

Original: English

JAPAN'S REVISED LETTER TO COMPLIANCE COMMITTEE CHAIR

[ICCAT Salida #8049, dated 5 November 2018]



ICCAT

2 November 2018

ENTRADA # 10978

FISHERIES AGENCY

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October 12, 2018

Mr. Derek Campbell
Chairman
Compliance Committee of the ICCAT

Dear Mr. Campbell,

Thank you for your letter circulated on 11 October 2018, which provides helpful guidance for the coming COC sessions.

In response to your invitation for CPCs to register areas of COC's priority, Japan would like to suggest that COC review and renew the compliance status of CPCs with Rec. 13-13 on ICCAT record of vessels, in relation to IMO number.

IMO numbers have been used as a unique vessel identifier of fishing vessels under vessel registration of RFMOs including ICCAT, to track fishing vessels moving between different owners and/or flag states and ultimately prevent IUU fisheries.

Last December, the IMO adopted Resolution A.1117 (30), which amends the IMO number scheme to expand fishing vessels' eligibility for IMO numbers from vessels 100 GT and above to motorized inboard fishing vessels below 100 GT down to 12 meters in length overall authorized to operate outside waters under national jurisdiction of the flag State.

Turning to ICCAT's requirement on IMO number, paragraph 2 of Rec. 13-13 requires CPCs to register fishing vessels 20 meters in length overall or greater ("LSFVs" hereinafter) authorized to operate in the convention area with detailed information of the vessels including IMO or LR number (if assigned). In addition, 5 bis requires as follows:

Effective January 1, 2016, flag CPCs shall authorize their commercial LSFVs to operate in the Convention area only if the vessel has an IMO number or a number in the seven-digit numbering sequence allocated by IHS-Fairplay (LR number), as applicable. Vessels without such a number shall not be included in the ICCAT record. [emphasis added]

With these taken into account, Japan is of the view that the applicability of paragraph 5bis of Rec. 13-13 has been already expanded to include motorized inboard LSFVs below 100 GT (down to 20 meters in length overall, of course) authorized to operate in the Convention area and outside waters under national jurisdiction of the flag State.

Paragraph 5 tris of the Rec. 13-13 exempts following vessels from this requirement:

"a) LSFVs unable to obtain an IMO/LR number, provided that the flag CPC provides an explanation of its inability to obtain an IMO/LR number in its submission of information pursuant to paragraph 2.

b) Wooden LSFVs that are not authorized to fish on the high seas, provided that the flag CPC notifies the Secretariat of the LSFVs for which it is exercising this exemption in its submission of information pursuant to paragraph 2."

I would like to clarify that this exemption is still valid; however, if the inability explained in a) above is no longer applicable as a result of the expanded eligibility of IMO numbers, I believe that the compliance status of the vessel should be updated.

I would appreciate it if you could make it possible for COC to review and discuss whether CPCs are complying with this requirement.

Sincerely,

[signed]

Shingo Ota
Japan's Commissioner to the ICCAT