

**RESPONSES FROM CONTRACTING PARTIES TO
COC CHAIR' LETTERS REGARDING COMPLIANCE
RECEIVED BEFORE 18 OCTOBER 2019**

Annex 1 of document **COC-309** contains the letters sent by the COC Chair and having received a reply by the CPC before the deadline. **Annex 2** contains the letters sent by the Chair being without reply by 10 October 2019. Replies received after the deadline will be presented as **Addendum** to **COC-309**.

RI= Reporting issues; II = implementation issues; none = no letter sent

<i>CP</i>	<i>Subject letter COC Chair</i>	<i>Reply received</i>	<i>Template completed</i>	<i>Missing information sent</i>
Albania	RI	24/09/2019	Yes	Yes
Algeria	II	17/10/2019	Yes	
Angola	RI	(receipt acknowledged) 18/09/2019		
Barbados	RI	19/10/2019	No	Yes
Belize	II	16/10/2019	No (issue addressed in letter text)	No (observer data not yet available)
Brazil	II	18/10/2019	Yes	Yes
Cabo Verde	RI	18/10/2019	Yes	Partially (some BET quarterly missing. Some info to be sent 31 October 2019?)
Canada	None			
China PR	II	18/10/2019	Yes	No (not yet available)
Côte d'Ivoire	RI			
Curacao	RI	19/10/2019	Yes	Yes (except EEZ data, not available)
Egypt	II			
El Salvador	II; RI	19/10/2019	Yes	n/a (data was received previously but late)
European Union	RI	02/10/2019 11/10/2019	Yes	Yes
France SPM	II			
Gabon	II; RI	19/09/2019	No	No
Ghana	II	17/10/2019	Yes	Yes
Grenada	RI			
Guatemala	RI	25/09/2019	No	Partially
Guinea Equatorial	RI			
Guinea Bissau	RI			
Guinea Rep	RI			
Honduras	RI			
Iceland	None			
Japan	RI	29/09/2019	Yes	Yes

<i>CP</i>	<i>Subject letter COC Chair</i>	<i>Reply received</i>	<i>Template completed</i>	<i>Missing information sent</i>
<i>Korea</i>	<i>none</i>			
Liberia	RI			
Libya	II; RI	17/10/2019	Yes	n/a
Mauritania	RI			
Mexico	II; RI	17/10/2019	No	Yes
Morocco	II; RI	23/09/2019	Yes	Partially (no observer data available)
Namibia	II; RI			
Nicaragua	RI			
Nigeria	RI	17/10/2019	No	Partially
Norway	<i>none</i>			
Panama	II; RI	04/10/2019	Yes	Partially
Philippines	RI			
Russia	RI	17/10/2019	Yes	Yes
Sao Tome e Principe	II; RI			
Senegal	II	26/09/2019	Yes	No (for most issues n/a)
Sierra Leone	ID lifted, RI			
<i>South Africa</i>	<i>none</i>			
St Vincent & Grenadines	II; RI			
Syria	II	17/10/2019	Yes	Partially
Trinidad & Tobago	II	16/10/2019	Yes	Partially (ports and observer data not yet available)
Tunisia	II	27/09/2019	Yes	Yes
Turkey	II	08/10/2019	Yes	Yes
UK-OT	II	14/10/2019	Yes	No (no observer data yet available)
<i>United States</i>	<i>none</i>			
Uruguay	RI			
Vanuatu	RI			
Venezuela*	RI			

*Replied to previous year's letter 2018.

**RESPONSES FROM COOPERATING NON-CONTRACTING PARTIES,
ENTITIES OR FISHING ENTITIES TO LETTERS OF CONCERN**

<i>Flag</i>	<i>Subject letter COC Chair</i>	<i>Reply received</i>	<i>Template completed</i>	<i>Missing information sent</i>
<i>Bolivia</i>	<i>none</i>			
<i>Chinese Taipei</i>	<i>none</i>			
Costa Rica	RI; II	18/10/2019	Yes	Yes but (some clarification may be required)
Guyana	RI; II			
Suriname	<i>none</i>			



REPUBLIKA E SHQIPËRISË

MINISTRY OF AGRICULTURE AND RURAL DEVELOPMENT

NrProt.

Tiranë, më ____ . ____ . 2019

Mr. Derek Campbell
Compliance Committee Chair
ICCAT Secretariat
Corazon de Maria, 8-28002 Madrid, Spain

SUBJECT: RESPONSE TO LETTER NO. 6574/2019 ON COMPLIANCE ISSUES

Dear Mr Campbell,

On behalf of the CPC Albania, I am writing to response you about the reporting and implementation deficiencies for Albania regarding ICCAT requirements, noted on Compliance Committe in 2018 and mentioned in your letter No. 6574/2019.

Above all, I do apologise for the slightly late reporting by Albania the Annual Report and Statistical data in 2018. Actually, we sent the Annual Report and Statistical data on October 1, 2018, but seeing the reporting deficiencies for Albania during 2015-2017, mentioned in your letters (No. 2464/2017 and No. 3236/2018) we sent again it on October 4, 2018, including all missing data of the previous years. This is the reason for the three day delay in reporting in 2018.

Albania completed and sent Shark_Check_Sheet (Rec. 16-13) on 01/10/2018 and sent again an update one to ICCAT on 02/09/2019 (Rec. 18-06).

Regarding the legally binding domestic measures to implement ICCAT requirements, Rec. 16-13 including, allow me to explain that, based on Albanian Constitution (Art. 122), any international agreement that has been ratified constitutes part of the internal juridical system after it is published in the Official Journal of the Republic of Albania and an international agreement that has been ratified by law has superiority over laws of the country that are not compatible with it.

Based as above, every year, Albania fully adopt ICCAT Recommandations by Ministerial Order.

On the other hand, we have sent to ICCAT Depositary on 05/10/2018 the Law 64/2012 "On Fisheries" as well as different Decision of Council of Minister deal with fisheries as control regulation, management regulation, IUU regulation etc. I am so sorry the above legally domestic acts were in Albanian language. We will send to ICCAT the English version of the Law 64/2012.

*(For more details about legally binding domestic measures for the implementation of some species specific shark requirements, please see **COMPLIANCE LETTER RESPONSE TEMPLATE**).*

Regarding the national scientific observer programme (Rec.16-14), as we have declared in Annual Report (2018 – 2019), Albania does exercise neither other fishing method for BFT (long line, harpoons, traps etc.) nor catch of other species (SWO, BET, ALB etc.). The entire national quota of BFT (2018 – 100 metric tons and 2019 – 157 metric tons) is carries out by only one purse seiner vessel, fishing for one month in the Mediterranean.

Albania started, early 2019, the implementation of the by-catch monitoring program through the observers on board of fishing vessels (bottom trawlers, pelagic trawlers and purse seiners in Adriatic Sea) with the support of GFCM. This program aims to obtain representative data on the discard component of total by-catch, as well as information on the incidental catch of vulnerable species in all designated ports.

Thanks to the generous help and readiness of Compliance Committee and ICCAT Secretariat, CPC Albania has endeavored to timely report all ICCAT requirements and we are making every effort to proceed in this direction.

Dear Derek,

I am so sorry hearing about your health issues and I wish a speedy recovery, above all for you and your family.

In thanking you for your support to these important matters, let me express to you the assurance of my highest consideration.

Arian Palluqi

Head of Albanian Delegation

COMPLIANCE LETTER RESPONSE TEMPLATE

2018 Commission Meeting			
CPC: ALBANIA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year: replied			
Annual Report	Part 1 of Annual Report received late and Part II slightly late.	Albania sent in 2018 all missing data of the previous years.	Task I (ST01 and ST02 form) and Task II (ST03) for the years 2014 – 2017 were sent
Statistical data reporting	Statistical data reported late.	Albania sent in 2018 all missing data of the previous years.	Task I (ST01 and ST02 form) and Task II (ST03) for the years 2014 – 2017 were sent
	Rec. 16-14: no National Scientific Observer Programme data received (ST09).	Albania does not have the national BFT observer programmes.	All data are reported in “ST01 to ST03” forms
MCS Measures	Rec. 16-14: Not yet implemented, but actions currently being taken to implement in 2019.	Albania started, early 2019, the implementation of the by-catch monitoring program through the observers on board of fishing vessels (bottom trawlers, pelagic trawlers and purse seiners in Adriatic Sea)	
	Rec. 16-13: No legally binding measures taken to implement species specific shark requirements.	<p>Law 64/2012 “On Fisheries”</p> <p>Article 37</p> <p>Prohibition of Fishing of Certain Types of Marine Organisms</p> <p>1. Catching, retention on board, transshipment, intentional landing and launch into market or for human consumption, at any time, area and using any type of equipment or gear, is prohibited for the following marine organisms: a, b,.....</p> <p>e. sharks</p> <p>f, g,</p> <p>DCM No. 402, date 08/05/2013</p> <p>Concerning</p>	The shark check sheet, required under Rec. 16 – 13, is submitted on 01/10/2018 and sent again an update one to ICCAT on 02/09/2019 (Rec. 18-06).

		management measures for the sustainable exploitation of fishery resources in the sea Chapter III 1. Bottom-set nets shall not be used to catch the following species: Albacore (<i>Thunnus alalunga</i>), Bluefin tuna (<i>Thunnus thynnus</i>), Swordfish (<i>Xiphias gladius</i>), Ray's bream (<i>Brama brama</i>), Sharks (<i>Hexanchus griseus</i> ; <i>Cetorhinus maximus</i> ; <i>Alopiidae</i> ; <i>Carcharhinidae</i> ; <i>Sphymidae</i> ; <i>Isuridae</i> and <i>Lamnidae</i>).	

COMPLIANCE LETTER RESPONSE TEMPLATE

2018 Commission Meeting			
CPC: ALGERIA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATA MISSING DATA/INFORMATION SENT (if applicable)
Statistical data reporting	No national scientific observer programme data (ST09) received.	<p>It should be noted that there is 100% coverage of bluefin tuna fishing by purse seine vessels, by fisheries administration controllers, which satisfies the assigned control missions and also fulfils the mission to collect scientific data. For swordfish, there is no coverage by scientific observers, since Algerian longline vessels targeting swordfish are less than 12 m in length. Since this space is insufficient, the safety of the observer to be embarked cannot not be ensured.</p> <p>Therefore, Algeria has used an alternative method of scientific monitoring, which is being implemented. This method consists in installing a monitoring and data collection system for target catch and bycatch, involving scientists from the Fisheries Sector Research Centre "CNRDPA" and inspectors from the decentralised services of the fisheries sector and the fisheries managers of the fisheries administration at branch offices with sufficient knowledge to carry out the task.</p>	To respond to ICCAT requirements, Algeria provided information on form ST09 for 2019.
MCS Measures	Rec. 13-11: The report does not clearly mention if safe handling practices are used.	Pending enactment of the new regulations, a circular has been issued and distributed nationally, and has been discussed with practitioners with the	

		<p>aim of raising awareness and explaining to them the practices and measures to be taken for bycatch and sea birds.</p> <p>The circular is attached to this table.</p>	
	<p>Rec. 16-13: No legally binding measure has been taken to implement the general measure. Absence of legally binding measures for species-specific prohibitions.</p>	<p>Duly completed check sheet has been submitted. Nominal catches for two shark species were reported on the Task II form, on 29 July 2018.</p> <p>Algeria also reiterates that there is no fishery directed at sharks.</p>	<p>Within the framework of implementation of legally binding measures, Algeria has implemented a regulatory text that prohibits fishing for silky shark.</p>
Catch limits and quotas	<p>No compliance table (Rec. 11-11) for Mediterranean swordfish.</p>	<p>Bluefin tuna compliance table "form CP13-COC_Sec" containing information on swordfish quota consumption was submitted on 13 August 2018. However, in accordance with paragraph 37 of Recommendation 16-05, Algeria reported quarterly to ICCAT a quarterly catch report.</p> <p>It is also important to note that this issue was not raised with Algeria at the 2018 annual meeting (COC meeting).</p>	<p>Date of transmittal: 13/8/18</p>



*Ministry of Maritime Affairs,
And the Blue Economy*



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101/13
October 18, 2019

Mr. Derek Campbell
Compliance Committee Chair
ICCAT,
Corazón de María, 8. 28002
Madrid
SPAIN

Dear Mr. Campbell

I refer to your letter # 6574 of September 18th 2019 in which a number of compliance issues were noted. I have attempted to respond to the Compliance issues raised in your letter in as succinct a manner as possible in the table template provided in your letter. However, I think that more complete explanations are necessary for some of the key overarching matters that also impact on the more specific issues raised and for which the format of the template does not permit elucidation. In this regard the overarching topics that I will address are" Reporting deficiencies; Development of an observer programme; Legally binding measures for implementing certain ICCAT recommendations; and Exceeding the Blue Marlin quota.

Reporting Deficiencies

While I apologize for the reporting deficiencies that are noted in the letter, I reiterate that the collation and reporting of information on Barbados' fisheries is borne by the Fisheries Division. The Division has a small staff, and while every attempt is made to ensure that all reporting obligations to all relevant agencies including ICCAT are met in a timely manner, lapses still occur especially when additional reporting demands are made.

Observer Programme

While Barbados recognizes the value of an observer programme for its longline fleet, practical considerations make implementation of such a programme that would meet the requirements of ICCAT extremely difficult. The problems related to having an onboard observer were articulated in Barbados objection to ICCAT Rec. 10-10 "Recommendation by ICCAT To Establish Minimum Standards for Fishing Vessel Scientific Observer Programs", and for which the same constraints apply in the case of Rec. 16-14. viz Barbados' longline vessels are relatively small (less than 15m overall length) and as such any on-board observer would necessarily be expected to participate in the work and therefore be part of the crew and thus would not meet the criteria of an observer by ICCAT standards in particular that observers are not crew members of the vessel being observed

(Rec 16-14; 3 (a)). This leaves the only practical observer programme option as an electronic monitoring system. However, a number of critical issues concerning *inter alia* cost, cost sharing (between government and fishers) and legal ramifications, need to be addressed before such an observer programme can be implemented.

Legally binding measures needed for implementing certain ICCAT recommendations.

The existing construct for legislating fisheries management measures in Barbados does not facilitate the timely implementation of new or changes to existing regulations required in the contemporary dynamic fisheries management environment. Unfortunately, this has resulted in a number of ICCAT recommendations not being put into law as yet. Attempts have been made primarily in the form of drafting a new suite of fishery management regulations that are specifically designed to legislate most fisheries regulations within the shorter timeframes required. However, as noted in this year's annual report, from the middle of 2018 the Fisheries Division, which traditionally fell under the Ministry of Agriculture, was placed within the newly formed Ministry of Maritime Affairs and the Blue Economy. While this new arrangement offers many potential advantages for the development and management of fisheries, the change has also resulted in a delay in the fisheries legislative framework reform process. Nevertheless, it should be noted that Stakeholder participation is considered an important component of local fisheries management and as such the fishing community must first be consulted before any legal measures in respect of ICCAT measures, which are likely to seriously impact on the fishing industry, can be feasibly implemented.

Exceeding the Blue Marlin Quota

The methods and gear used in the Barbados longline fishery are relatively unsophisticated and non-selective and as such all species of fish susceptible to the gear and within the fishing range are equally exposed to the risk of capture. In this context it should be noted that Barbados is located within an area of relatively high billfish, including blue marlin, abundance and the likelihood of catching these species is commensurately high. The area has also been severely impacted by mass incursions of *Sargassum* recently on an annual basis. This has resulted in significant changes in the catch composition of local fisheries especially in near-catastrophic reductions in the catches from the island's staple flyingfish and associated dolphinfish fishery. On the other hand based on catch indices, the abundance of the highly migratory species, including marlins has either remained relatively stable or may actually have increased through this period. It should be noted that billfish is consumed in Barbados, and is important in both economic terms for the fishing industry and from a national food security perspective, especially in the face of the significant depression in production from the flyingfish fishery. Nevertheless, the only real options available to reducing marlin catches under these circumstances, and in a way that would not render the local longline fishery inviable, is the substitution of circle hooks for conventional J hooks by the local fleet and where practical adjusting the fishing depths of the gear. In this context, the Fisheries Division is exploring options for funding such an undertaking.

I hope that this letter addresses the concerns raised by the Compliance Committee.

I am also pleased to hear that you are on the road to recovery after ill health. Please accept the assurances of my highest consideration.

Sincerely



Christopher Parker
For CHIEF FISHERIES OFFICER

COMPLIANCE LETTER RESPONSE TEMPLATE

2018 Commission Meeting			
CPC: BARBADOS			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year: replied			
Statistical data reporting	Rec. 16-14: No national scientific observer programme data (ST09) received.	Barbados has not been able to develop or implement a practical on-board observer program for Barbados vessels due to their small size (<15m). Electronic monitoring is being considered however a number of issues including cost and legal considerations need to be addressed first.	
MCS Measures	Rec. 16-01: Quarterly BET catches submitted late.		Missing data submitted October 18 th 2019.
	Rec. 12-07: Not clear from report if foreign vessel access to Barbados' ports is prohibited generally.	Foreign vessels are allowed to access Barbados' ports. However, prior notification and permission from the Chief Fisheries Officer is required before fish can be transhipped or landed.	
	Rec. 02-21/22: No validation seals/ signatures for SDs submitted.	Official Signatures for SDs will be submitted by October 31 st 2019.	
	Rec. 10-09: No information on sea turtle mitigation measures.	As noted in the National report for 2018. The use of circle hooks should	

		reduce the mortality rate of any turtles caught on longline gear and in tandem with this, the Fisheries Division will be collaborating with the Barbados Sea Turtle project in a programme to advise and fishers on the best practises of safely extricating non target species including turtles from longline gear to reduce injury and morality	
	Rec. 15-05 and 16-11: Response incomplete.	Barbados continues to struggle to constrain annual BUM and WHM catches to below the very low threshold level of 10 T due to the non –specificity of longline fishing methods and gear and the abundance of marlins within the range of the local fishing fleet. The use of circle hooks instead of conventional “J” hooks in addition to training fishers on safely removing hooked live fish is recommended as the best means of reducing billfish landings. Funding options are being explored.	
	Rec. 17-08: No report of SMA catches for first semester of 2018.	No SMA were landed at Barbados in 2018.	Information submitted October 18 th 2019.
	Rec. 16-13: No legally binding measures	As noted in the current annual	

	adopted to implement some species-specific shark requirements.	report, proposed legislation has been drafted that would mandate that all sharks are landed with fins still naturally attached to the carcasses. Implementation of species-specific recommendations will be guided by assessment of relevant information and consultation with the fishing community.	
Catch limits/quotas	Overharvest of BUM according to Task I data, but no compliance table (Rec. 11-11) submitted for BUM.	Please see explanation regarding overharvest of BUM and the proposed introduction of circle hooks.	Compliance table submitted on 15 th September 2019.



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REF: HSFU-RFMO-V10-2019(43) Vol.1

10th October 2019

Mr. Derek Campbell
Chair of Compliance Committee
ICCAT

Subject: Letter Regarding Implementation of ICCAT Requirements in 2018

Dear Mr. Campbell,

Thank you for your letter dated September 18, 2019 regarding the subject matter. In response to the concern regarding possible incomplete data reporting as a result of recreational and artisanal fisheries in Belize's waters, please note the following:

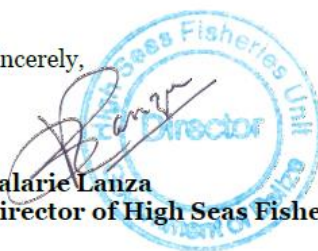
- Belize's artisanal fisheries, which represents a significant part of the productive sector and subsequently, its GDP, does not interact with ICCAT regulated species and there is nothing further to report in that regard.
- With the development of its tourism industry, recreational and sport fisheries have become a more prominent feature in Belize. While it is known that this fishery interacts with ICCAT regulated species, the extent of interaction and subsequent implementation of pertinent ICCAT requirements is unclear. The BHSFU, as Belize's representative organization on the Commission, has initiate dialogue with the relevant competent authorities to sensitize them of the relevant ICCAT requirements, and to ascertain the level of regulations that exist and data that has been collected within this sector.

Belize remains committed to the fulfilment of the Convention's objectives and will take the necessary steps to ensure that it restores full compliance with all ICCAT requirements; noting

the mechanisms in place to facilitate improvements in data collection and quality assurance as provided by Resolution 03-21.

I avail myself of this opportunity to express to you and the Commission, the renewed assurances of my highest consideration.

Sincerely,

A circular blue stamp of the Belize High Seas Fisheries Unit is placed over the signature. The stamp contains the text "Belize High Seas Fisheries Unit" around the perimeter and "Director" in the center.

Valarie Lanza
Director of High Seas Fisheries

cc: R. Delgado, Commission Chair

To the ICCAT Secretariat
Corazón de María, 8. 28002
Madrid, SPAIN

Subject: Brazil response on compliance issues - doc 6574/19-ICCAT

Dear Mr. Derek Campbell,

Let me take this opportunity to thank you for your letter drawing our attention to some compliance issues faced by Brazil (Doc 6574-19). The first thing I am very glad to inform you is the recent change we had in Brazil institutional structure for the management of the Fisheries Sector. After 20 years of a shared management responsibility, split between the Ministry of the Environment and the institution responsible for the fisheries sector, which changed 5 times in the last 5 years, the institutional responsibility to manage Brazilian Fisheries was again unified in a single government organ: the Secretariat of Aquaculture and Fisheries of the Ministry of Agriculture, Livestock and Supply. This institutional change was fundamental to ensure a much more agile and efficient management of the fisheries sector in the country, including surely the tuna fisheries. As you might have already noticed, the commitment of the Secretariat to fulfil its obligations to ICCAT has already been reflected in both the timeliness and the completeness of all information we are required to submit this year.

Specifically, regarding the Brazilian deficiencies noted in the letter from the Compliance Committee, referring to: 1) REC. 16-14: no data received from the National Scientific Observation Program (ST09); and 2) REC. 13-13/ 14-10: vessels reported for inclusion in the ICCAT Registry for more than 45 days retroactively, we are pleased to provide the necessary explanations addressing these failures in the COMPLIANCE LETTER RESPONSE TEMPLATE below.

COMPLIANCE LETTER RESPONSE TEMPLATE

2018 Commission Meeting			
CPC: BRAZIL			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/ INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year		Replied	05/10/2018
Statistical data reporting	REC. 16-14: No data were received from the National Scientific Observation Program (ST09)	A new Scientific Observer Program, under the Research Project named PROTUNA was implemented in 2018, with the data being reported in 2019. The deficiency was thus rectified.	02/10/2019
MCS Measures	Rec. 13-13/14-10: Vessels reported for inclusion on the ICCAT Record more than 45 days retroactively.	There was a delay for the State authority to inform the Federal Government, which was linked to the previous administrative structure and was overcome with the institution of the new Secretary. Such a delay, therefore, should no longer happen.	NA
	Rec. 16-13: Unclear if legally binding measure is taken for some shark species.	All shark species managed by ICCAT have binding measures adopted by the Brazilian Government and all the information on this regard has been properly submitted on the Shark Implementation Check Sheet. They had been also presented in 2018, so we do not fully understand why this was considered to be unclear.	26/09/2018
Catch limits/quotas	Rec. 11-11: compliance tables submitted late.	We made a mistake on the deadline date, from the 15 th to the 25 th , which should not happen again.	24/08/2018

MINISTRY OF MARITIME ECONOMY
GENERAL DIRECTORATE OF MARINE RESOURCES

Compliance Committee Chair

Ref. No.: No. 290/DGRM/2019
Praia, 18 October 2019

SUBJECT: LETTER REGARDING COMPLIANCE ISSUES

We acknowledge receipt of letter No. 6574/2019 of 18 September, on compliance issues regarding some reporting and implementation deficiencies of ICCAT requirements by Cabo Verde.

Cabo Verde has made efforts to respond to all ICCAT requirements and we will work to correct shortcomings in the 2017 report (late or incomplete submission).

We also inform that the 2017 report will be submitted with the missing data/information. Please find attached the compliance letter response template.

Cabo Verde intends to request assistance for data collection and reporting to FAO and financial assistance from Founs for data for Rec. 03-21 which seeks to improve data collection.

I appreciate your attention in this matter, please accept the assurances of my highest consideration.

Director General

(signed and sealed)

Vera Cristina Freitas Almeida Gominho

COMPLIANCE LETTER RESPONSE TEMPLATE

2018 Commission Meeting			
CPC: CABO VERDE			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATA MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year			
Annual Report	Part 1 of Annual Report received late.	Final report was submitted on 1 October 2018.	1 October 2018
	Fleet capacity submitted late.	Fleet capacity submitted on	27-09-2018.
Statistical data reporting	No national scientific observer programme data (ST09) received.	There is no scientific observer programme.	
MCS Measures	Rec. 16-01: Bigeye tuna quarterly catch reports for 2017 not reported for last three quarters.	In 2017, total catches of skipjack tuna for Cabo Verde were 1107 t (Task I), reported to ICCAT 27/07/2018. Meeting with vessel owner in 2019.	Task I reported to ICCAT on 27/07/2018. The 2017 report will be submitted with the data at 31 October 2019.
	Rec. 17-08: No response to request for submission of North shortfin mako shark catch data.	Not applicable (there is no national float for this fishery).	
	Rec. 16-15: Responses to requirements were unclear and may be insufficient.	Transshipping in Cabo Verde ports is controlled by fishing inspectors. Each inspection results in a detailed report: quantity, species, gear type and fish quality. In the case of infringement, a notification is sent to the vessel / vessel owner.	
	Rec. 12-07: Copies of port inspection reports not received, although designated ports on ICCAT record.	Due to internal modifications to the inspection service (ACOPESCA/UGQ), data have been requested and reported to the DGRM.	The 2017 report will be submitted with data (5% of inspections) at 31 October 2019.
	Recs. 15-05 and 16-11: the response is not sufficient because related legislation is required.	Decree-Law No. 37/2015 of 29 July – defines the activity regime of the recreational fishery as tourist and nautical and the economic	In 2019 we have informed all companies that data reporting is mandatory. Ref.Nº289/DGRM/2019.

		<p>exploitations.</p> <p>Article 42 – The target species for which the current rules on protection of fisheries resources are implemented, in particular, those of the Fisheries Resources Management Plan and those to be published in the Pays, as well as all the treaties and conventions to which Cabo Verde is a signatory, in particular the management measures of the International Convention for the Conservation of Atlantic Tunas (ICCAT) and the management measures for shark and ray stocks recommended by the FAO.</p> <p>Sampling programme is a measure for Rec. 16-11.</p>	<p>Sampling programme in progress.</p>
	<p>Rec. 16-12: the response is insufficient, no measures taken but are required.</p>	<p>Shark conservation programme</p> <p>Study developed in 2010</p> <p>“Scientific advice on the conservation of pelagic shark associated with fishing activities within the framework of the EU-Cabo Verde sustainable fishing agreement”, indicated that the blue shark stock in the Cabo Verde EEZ was not threatened.</p> <p>- Monitoring of this fishery has been controlled to ensure sustainable exploitation of this fishery and, if necessary, additional fisheries measures are taken if reference tonnage is exceeded.</p> <p>- Shark database</p>	<p>Cabo Verde is going to request assistance for data collection and reporting to the FAO.</p>
	<p>Rec. 10-09: no national measure has been adopted to ensure that turtles are</p>	<p>Unlike sea turtles, they are protected on the basis of regulations of a general scope only, i.e. Decree Law No. 7/2002 of 30 December</p>	<p>In progress in 2019, the draft aims to reduce bycatch of sea birds and turtles in the industrial fishery (data collection).</p>

	released unharmed.	<p>2002 on conservation and protection measures for some threatened species, in particular land fauna and flora, reptiles and sea mammals.</p> <p>Decree-Law No. 2/2015 of 9 October 2015 amending Decree-Law No. 53/2005 of 8 August 2005, on the Cabo Verde Fishing Code, defines the general principles of the policy for sustainable exploitation of fisheries resources.</p> <p>Under Article 40 (sea turtles) of this Decree-Law, it is expressly prohibited to catch, possess, merely retain or acquire, land, trade and consume sea turtles.</p> <p>Conventions, agreements and protocols ratified by Cabo Verde (with emphasis on those related to conservation of fauna and flora).</p> <ul style="list-style-type: none"> - Convention on biological diversity - 29 March 1995. - Convention on International Trade in Endangered Species of Wild Fauna and Flora, CITES, Council of Ministers: Decree No. 1/2005 of 21 March - 10 August 2005. - Convention on the Conservation of Migratory Species of Wild Animals - Council of Ministers: Decree No. 13/2005 of 5 December - 18 January 2006. - United Nations Convention on the Law of the Sea - 10 August 1987. - Convention on wetlands of international importance, in particular as waterfowl 	
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		habitats - Ramsar 1971 - 18 November 2005	
	Rec 16-13 No legally binding measure for sharks has been adopted.	<p>Decree-Law No. 2/2015 of 9 October 2015 amending Decree-Law No. 53/2005 of 8 August 2005, on the Cabo Verde Fishing Code, defines the general principles of the policy for sustainable exploitation of fisheries resources.</p> <p>BO 16-03-2017 BI-ANNUAL EXECUTIVE PLAN FOR FISHERIES RESOURCES.</p> <p>The main species caught in Cabo Verde (<i>Mustellus mustellus</i>), (<i>Galeocerdo cuvieri</i>), (<i>Isurus oxyrinchus</i>) (<i>Prionace glauca</i>).</p> <p>Management measure</p> <p>a) Prohibition on fishing for shark with the simple aim of using the fins;</p> <p>b) Prohibition throughout the Cabo Verde EEZ on hoisting, retaining onboard and transshipping shark fins;</p> <p>c) Authorisation, without prejudice to the measure referred to above and facilitating storing onboard so that shark fins can be partly cut and drawn against the carcass;</p> <p>d) Prohibition on fishing, retaining onboard, transshipping, landing, storing, selling or offering for sale throughout the Cabo Verde EEZ part or whole of the carcass of the following species: whale shark (<i>Rhincodon typus</i>), great white shark (<i>Carcharodon carcharias</i>), hammerhead shark (<i>Sphirna zygaena</i>, <i>Sphirna lewini</i> <i>Sphirna mokarran</i>), basking shark (<i>Cetorhinus maximus</i>),</p>	Fishing Resources Management Plan 2019-2023, revised in 2019.

		<p>oceanic whitetip shark (<i>Carcharhinus longimanus</i>), bigeye thresher shark (<i>Alopias superciliosus</i>);</p> <p>e) Definition of the maximum number of fishing licenses to be agreed each year; and</p> <p>f) Implementation of fisheries surveillance mechanisms provided for in the national action plan.</p> <p>Conventions, agreements and protocols ratified by Cabo Verde (with emphasis on those related to conservation of fauna and flora).</p> <ul style="list-style-type: none"> - Cooperating Partnership Agreement – WAEMU- SRFC. - Minimum conditions for access to fishery resources – MCA. - Memorandum of Understanding for coordination between institutions and regional fisheries organisations, in the ATLAFCO area. - United Nations Convention on the Law of the Sea - Law No. 17 / II / 87 of 3 August - 10 August 1987. - Adoption of the Agreement on Port State Measures - FAO (2009). - International Convention defining the access conditions to fisheries resources and their exploitation off the coasts of the member States of the Sub-regional Fisheries Commission – 1993 - National Assembly: Resolution No. 38 / V / 96 of 30 December. - Adoption of the Agreement on Port State Measures - FAO (2009). 	
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		<ul style="list-style-type: none"> - International Action Plan aiming to prevent, prohibit and eliminate IUU fishing (FAO-IUU) – FAO – 2001. - Adoption of a community system aiming to prevent, deter and eliminate illegal, unreported and unregulated fishing activities (2008). 	
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Dear Mr. Campbell,

This is to acknowledge receipt of the letter on compliance issues sent by you on 18 September 2019 with ICCAT reference No.6574 and the deadline for reply this letter is due to 18 October 2019. I would like to take this opportunity to express our appreciation for your hard work and great efforts on promoting compliance by all CPCs.

In this letter of concern, China was identified as no list of designated ports for foreign flagged vessels required in Rec.12-07 (repealed and replaced by Rec.18-09) at the last Commission meetings, although China provide much information explaining this situation and take many other actions equivalent to port state measures to comply with Rec.12-07/18-09. In replying the letter of concern, I would like to submit the following actions China had taken to rectify the deficiency.

Firstly, Since the entry into force of the FAO port state measures from June 2016, the Ministry of Agriculture of Rural Affairs of China actively conducted research and feasibility study of joining in this Agreement. However, please noted that port designation and inspection in China involves in functions of many different department, including but not limited to this Ministry, Ministry of Transportation and General Administration of Customs. The key problem is to coordinate different department internally to advance the process. Nonetheless, In the year of 2019, this Ministry taking the leading role to actively promote the coordination of different department and made great progress so far. Meanwhile, China reform its law enforcement scheme and strengthen port inspection capacity-building in order to pave the way for the smooth implementation of port state measure in the near future.

Secondly, at the beginning of this year, the Ministry of Agriculture and Rural Affairs issued a circular that put all the IUU-listed vessels (247 in total) of seven RFMOs which China is a contracting party under the control of all the Chinese fishing port. The circular stipulated that Chinese port authority shall deny the request from IUU-listed vessels entry into its port, the Chinese fishing vessel owner or operator shall refuse to provide service to IUU-listed vessels, including re-fueling, docking, replenishment and maintenance, refuse the unloading, transshipment, processing and packaging of the catch caught by these IUU-listed vessels. Through this circular China fulfil its responsibilities as coastal state.

Thirdly, since from 2010, China started to implement *Customs Clearance Certificate* for fishery products of bigeye tuna, bluefin tuna, swordfish and toothfish which entered into China's territory, including imported catch as well as the catch caught by Chinese fishing vessels. Importer must apply for *Customs Clearance Certificate* to this ministry with some supporting materials including the original catch certificate issued by its flag state, only through this way can their product be cleared by Customs. In doing so, China makes its own efforts to promote the conservation and sustainable use of fishery resource and fight against IUU fishing, thus fulfilling its responsibilities as marketing state.

Lastly, In the past several years, China did conduct several port inspections for some foreign vessels on a case-by-case basis upon the request of other states or RFMOs. For example, in May of 2016, the Secretariat of CCAMLR request China to carry out port inspection to a foreign carrier vessel which suspected to violate CCAMLR measures. The then Ministry of Agriculture immediately coordinated relevant domestic departments including Ministry of Foreign Affairs, Transportation, Customs and local department to conduct port inspection to this vessel. China would like to continue this practice until we join in the PSM of FAO.

I wish to recall that at last annual Meetings, the Rec. 12-07 was repealed and replaced by Rec. 18-09, and Chinese delegation made a statement at that meeting that China can go along with Rec. 18-09 but have some difficulties in implementation of some provisions contained by Rec. 18-09 currently due to the necessary coordination with other domestic departments.

China commit itself to strictly comply with the ICCAT Convention and its conservation and management recommendations, make great efforts to promote the conservation and sustainable utilization of fishery resources not only in ICCAT but also in other areas, spare no effort to fight against IUU fishing activities. Meanwhile, we recognize the important role of port inspection played in detecting any violations by fishing vessels, therefore, we will quicken our pace to coordinate domestic different departments and try our best to join in PSM of FAO as early as possible.

I hope the above clarification and rectification could explain our efforts to comply with Rec12-07, the template is also attached in MS word format.

I am glad to hear in your letter that you have recovered from serious illness and wish you a good healthy every day and looking forward to seeing you in Spain soon.

With best regards.

SUN Haiwen
Director,
Division of Distant Water Fisheries,
Bureau of Fisheries, Ministry of Agriculture and Rural Affairs, China

2018 Commission Meeting			
CPC: CHINA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year: replied			
MCS Measures	Rec. 12-07: No list of designated ports for foreign flagged vessels.	1. Promote the coordination of different domestic department, reform its law enforcement scheme and strengthen port inspection capacity-building to pave the way for the implementation of port inspection.	18/10/2019
		2. Issue and publish circular that put all the IUU-listed vessels of seven RFMOs which China is contracting party under the control of all the Chinese fishing port.	
		3. Implement Customs Clearance Certificate for fishery products entered into Chinese territory.	
		4. conduct port inspection on a case by case basis upon requested by other states and/or RFMOs.	



MINISTRY OF
Economic Development
International Fisheries Commission

Aan
ICCAT
Att.: Mr. Derek Campbell
Compliance Committee Chair
Spain

Date 18th October 2019	Contactperson Ramon Chong	E-mail ramon.chong@gobiernu.cw	
Your letter dated 18th September 2019	Your number	Our number	Case number FMC 2019/1006
Topic Letter on Compliance Issues		Page(s) 1	Nr of Appendices 1

Dear Mr. Campbell,

We hereby kindly acknowledge receipt of your letter on mentioned topic.


First of all, we are happy to hear from your recovery and that you are fully available to facilitate and assist us in improving our compliance reporting requirements. We wish you lots of strength and a speedy full recovery.

We apologize for not having reported on time and in full with the required data and forms to comply with our reporting duties. We are taking several steps to avoid a repetition of this situation. Please be informed that we initiated with the recruitment of a compliance officer whom will be full-time in charge of this responsibility. In addition, we did get engaged in the latest detail of this reporting requirement in order to gain more knowledge and experience with this duty.

Please find attached the filled Compliance Letter Response Template as requested. Even though we are late, we have chosen to review all the relevant forms and lists already sent in order to better comply with this requirement.

We are committed to comply with our reporting requirements in full and we assure you that for the coming year we will perform with this obligation on time. But still, we would like to apologize to you and the secretariat for the difficulties created, especially in your effort to prepare the documents for the Commission meeting on time.

Regards,



Mr. R.R. Chong MURP, MPA
Chairman

Pletterijweg 43 | Willemstad, Curaçao | T. (+599 9) 462-1444 | F. (+599 9) 462-7390 | www.gobiernu.cw

COMPLIANCE LETTER RESPONSE TEMPLATE

2018 Commission Meeting			
CPC: CURAÇAO			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year: replied			
Annual Report	Part 1 of Annual Report: received late.	The necessary steps have been taken in order to prevent a recurrence of this event. Among others, the process has started to recruit a compliance officer.	
Statistical data reporting	Statistics may be incomplete as unclear as to whether catches in EEZ/ artisanal fisheries are included.	Be informed that there are no data available for the EEZ, due to no fishing activities by Curacao. With respect to artisanal fisheries in the TW, the catches are minimal or very limited. Up to date no data gathering on catches have been taken place.	
	ST08 (FADs) refers to 2016 data, 2017 data missing.	A timetable has been created to assure an on time reporting performance for the coming years.	ST08 (FADs) statistical data for 2018 has been send September 24, 2019. The ST08 for the year 2016 and 2017 has been sent November 13, 2018.
MCS Measures	Rec. 16-13: For many general/specific requirements, no legal instrument is cited. It is not clear whether the prohibition and (requirement for) release is legally binding.	The legal instrument is the decree A° 2018, N° 66, which is in line with CITES, the SPAW Protocol, and the CMS.	Shark Implementation Check Sheet has been sent on September 19, 2019.
	Rec. 12-07: No list designated ports.	The Port of Willemstad is designated as the only port for Curacao.	The Annual Report. Section 3, Part II already has been sent on October 8, 2019. Reference is made to the adjusted version, which is attached.

Catch limits/quotas	Overharvest of BUM according to Task 1 data, but no compliance table (Rec. 11-11) submitted for BUM.	Curacao remained within the quota of 10 ton. Only 2.3 ton has been harvested according to the submitted form ST-09.	The Bill Fish Check Sheet has been sent on September 19, 2019. Reference is made to the adjusted version of form CP-13, which is attached.

MINISTRY
OF AGRICULTURE
AND LIVESTOCK

FISHERIES AND AQUACULTURE DEVELOPMENT CENTRE
(CENDEPESCA)

000751

El Salvador, 18 October 2019

Mr. Camille Jean Pierre Manel
Executive Secretary
International Commission for the Conservation of Atlantic Tunas
Madrid, Spain

Executive Secretary,

I extend my cordial greetings to you as usual, and wish you success in your daily tasks. I will take this opportunity to respond to the letter of concern of 18 September last, with ICCAT salida No. 6574, that we received from the Compliance Committee (COC) Chair.

2018 Commission Meeting			
CPC: EL SALVADOR			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATA MISSING/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year			
Annual report	Part I of Annual Report: received late. Part II received slightly late.	We tried to remedy what happened in 2018, however, in 2019, the same situation occurred due to the transition to the new Government.	There are no data pending submission, however the Part I and II reports were submitted slightly late.
Statistical data reporting	Task I submitted late. Form ST08 (DCP) not submitted.	This year (2019), the forms were submitted late due to the transition to the new Government.	The official communication 000586 of 27 August 2018 included submission of the form ST08-FadsDep.
MCS Measures	Rec. 15-05 and 16-11: the responses could be insufficient.	In general, El Salvador's fishing fleet in the ICCAT area does not catch species covered by Recommendations 15-05 and 16-11. With all respect, we would appreciate better advice on the interpretation that the responses submitted could be insufficient.	

	Rec. 16-03: it is not clear whether all the measures are binding.	The measures are binding to the extent applicable, in line with our response to the Circular of 8 October 2018. El Salvador does not have shark fisheries in the ICCAT area. Any bycatch that may occur is dealt with as provided for in this recommendation.	
Catch limits / quotas	Rec. 11-11: compliance tables submitted late.	This is a limitation that we are trying to solve, the precarity of the staff dealing with these matters, and the transition to the new Government have delayed the submission of the tables referred to. We hope to overcome this issue with the current government administration.	

I appreciate your attention and understanding in this matter, and I take the opportunity to extend my greetings to you.

Your sincerely,

(signed and sealed)

Norma Idalia Lobo Martel
Director General



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

International Ocean Governance and Sustainable Fisheries

The Director

Brussels, 11.10.2019.

MARE/B2/EAP/Ares 6300479

Dr. Derek Campbell,
Compliance Committee Chairman
ICCAT
Corazón de María, 8-6°/7
28002 Madrid, SPAIN

**Subject: European Union reply to the letter on compliance issues
(circular #6574/19)**

Dear Dr. Campbell,

Thank you for your letter of 18 September 2019. The European Union has carefully considered the issues raised at the 2018 Annual Meeting regarding the European Union's performance. Please find attached our response to the compliance letter with an indication of the specific remedial action taken.

I trust that our reply provides a satisfactory response to all the points raised in your letter and I wish to reaffirm the strong commitment of the European Union to ensure full compliance with the ICCAT measures.

Yours faithfully,

(e-signed)

Veronika VEITS

2018 Commission Meeting			
CPC: EUROPEAN UNION			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year: Yes			
MCS Measures	Rec. 16-05: Late submission of SWO-MED vessel list for EU-Croatia.	The vessel list was sent within the applicable deadline by Croatia but due to a transition of staff it was not timely forwarded to ICCAT by the EU. The staff situation has been resolved and revised working procedures are now in place to address this matter.	07/03/2018
	Rec. 17-07: Deadline of one week for caging declarations often not respected. Some caging carried out after 15 August.	Reminders have been sent to the concerned administrations to respect the applicable deadlines. Caging after 15 August was due to the adverse weather conditions applicable in Mediterranean Sea, impacting the route of tug vessels. This is considered as <i>force majeure</i> .	The last caging declarations (MLT farms) have been sent on 03/02/2019
	Rec. 11-20: Some BCD reports received late.	According to para 34 of Rec. 18-13, a report shall be sent by each CPC, and not by EU-Member States (EU-MS). However, currently the eBCD system only allows extracting a report on a MS' by MS' basis. This adds an important administrative burden for the EU. Reports sent after 1 October 2018 concerned mostly EU-MS with very few trade operations. Consequently, reports sent on 1 October 2018 must be considered as the EU report, while subsequent transmissions should be considered as updates.	

		In 2019, the eBCD annual report for all EU-MS with activity in the eBCD were sent on 14 September.	
	Rec. 17-09: Some eBCD requests are followed-up late by EU-Administrators entailing pending requests for several days in the eBCD system.	<p>While this is unfortunate, this is not a compliance issue as there is no specific deadline.</p> <p>Administrations often require additional time in order to conduct the necessary verifications. As some EU-Member States have only occasional BFT trade activity, they have not designated eBCD administrators.</p> <p>Only when a company registers in the system and requests validation by one of those EU-Member States, a person is designated and registered in the system as administrator by the EU-MS. Due to the need to ensure that the relevant provisions are respected, the relevant administrations might occasionally experience some delays in processing the requests. Reminders have been sent to make all possible efforts to avoid unnecessary delays.</p>	
	Rec. 17-07; 16-05 and 12-07: Inspection reports received late.	In 2018 the COC concluded that only the inspection reports under JIS (BFT and M-SWO) and port standards (12-07 now 18-09) with an apparent infringement should be sent in its entirety to ICCAT. All other inspection reports without apparent infringement could be sent in a summarized form. Although no simplified form has been created yet, the EU considers that the priority information to	

		be provided is: inspecting CPC; number of the report; name of the inspected vessel; flag State of the inspected vessel; day of inspection. On this basis, the EU has sent the related reports for the year 2019 in due time.	
	Rec. 14-07: No Access agreements reported, but previous reports show agreements until 2020 and also reported by Liberia, Morocco and Senegal.	The EU has provided a web address where all related access agreements are publicly available. Following the discussion in COC at the 2018 annual meeting, the EU has now sent to the ICCAT Secretariat the collection of all the existing access agreements using the requested form CP039-AccAgr.	
	EU-Portugal BFT Other vessels over 15 m did not report any VMS messages.	Portugal provided VMS reports to the EU. Further investigation is needed to assess the possible causes of non-reporting.	
Catch limits/quotas	Possible overharvest of bluefin tuna.	See "other issues"	
Other issues	E-BFT issues under investigation	In June 2018, the Spanish Guardia Civil launched, in cooperation with Europol, the so-called Tarantelo operation, which dismantled an illegal network of illegal BFT being smuggled from Malta to Spain. In Spain the case is at one of the highest courts (Audiencia Nacional) while in Malta the matter is still under investigation by the police and the assigned magistrate in order to decide whether to open a criminal case at Court level. Moreover, the EU (Commission) has intensified internal controls and monitoring on BFT farms end 2018-2019, by carrying out	

		<p>random controls in relevant Member States, by identifying loopholes in the national control systems as well as in the existing ICCAT recommendation 18-02 and by launching a thorough review of the relevant sections of the eBCD (catch, transfers and caging). This review is currently under finalisation and results will be communicated to the Flag Member States, as well as CPCs involved, which have already been contacted and have been asked for full support to clarify some of the findings. We will continue to provide ICCAT CPCs with an update of the information.</p>	
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COMPLIANCE LETTER RESPONSE TEMPLATE

2018 Commission Meeting			
CPC: GHANA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year: replied			
MCS Measures	Rec. 12-07: no copies of port inspection reports received.	Port inspection reports were forwarded for 2018 as per the requirement. We will continue to improve on our data collection for submission for the coming years.	30/07/2019
	Rec. 16-01: FAD management plan not submitted.	FAD Management Plan was sent on 31/03/2015 and still relevant to Ghana as at today	ANN-GHA 2018 Part II – Section 3 (TRO 2010) submitted 09/08/2019
	Rec. 16-13: no legally binding domestic measures adopted to implement some species-specific shark requirements.	Ghana is incorporating measures in our new Fisheries Management Plan to be formulated for 2020-2024 (NPOA- on Sharks) and we will also seek for financial help in the area of taxonomy and fisheries ecology	
Catch limits/quotas	Overharvest of BET.	Adjusted quota for 2018 was 3716mt.	30/07/2019 Ghana CP13-COC_Sec_GHA
		Catch for 2018 was 3571mt	

GUATEMALA

VICE-MINISTRY OF
AGRICULTURAL HEALTH AND REGULATIONS

Guatemala, 25 September 2019

Official communication VISAR No. 427-2019/DSM/ssg

Mr. Derek Campbell
Compliance Committee Chair
International Commission for
the Conservation of Atlantic Tunas (ICCAT)

Dear Mr. Campbell,

I respectfully address you, and wish you success in your daily activities. The reason for my writing is to reply to ICCAT Circular No. 6574 of 18 September 2019 regarding the letter on compliance issues.

In this regard, I would like to inform you that the information required under Rec. 16-01, Rec. 16-14, Rec. 16-13, Rec. 12-07, as well as the overharvest of BUM will be submitted at the latest on Friday 27 September 2019, using the template sent by the Commission.

I appreciate your attention in this matter, and please accept the assurances of my highest consideration.

Your sincerely,

(signed and sealed)

Bryon Omar Acevedo Cordón
Vice-Minister of Agricultural
Health and Regulations

Attach: Official communication DIREC-660-2019

Directorate of Fisheries and Agriculture Regulations

Bárcenas, Villa Nueva, 23 September 2019
Official communication DIREC-660-2019

Dear Vice-Minister,

I respectfully address you in connection with your communication via e-mail of 20 September 2019, regarding the letter on compliance issues, for which you requested a meeting at 8.00 am today, and I would like to inform you of the following:

1. On 16 November 2018, the data corresponding to Guatemala's form ST08 were submitted to ICCAT. (A copy of this communication has been attached.) Only a portion of the documentation is pending, which was not submitted on time due to fact that at the time the Form ST09 was still being completed.
2. I have attached two drafts of the official communication to be submitted to Mr. Derek Campbell, Compliance Committee Chair and Mr. Alberto Parilla, both from ICCAT, which inform that the requested documentation will be submitted on Friday 27 September at the latest.
3. The documents that will be submitted together with these official communications will be sent to your office so that they can be forwarded as appropriate; the communications were submitted to you directly.

Please accept the assurances of my highest consideration.

Your sincerely,

(signed and sealed)

Carlos Francisco Marin Arriola
DIRECTOR
Directorate of Fisheries and Agriculture Regulations

Bryon Omar Acevedo Córdón
Vice-Minister of Agricultural
Heath and Regulations

COMPLIANCE LETTER RESPONSE TEMPLATE

2018 Commission Meeting			
CPC: JAPAN			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year			
Annual Report			
Statistical data reporting			
MCS Measures	Vessels reported for authorisation updates on the ICCAT Record more than 45 days retroactively.	This non-compliance was that a staffer working for ICCAT vessel register in the Fisheries Agency missed a notification of newly-licenced vessel from the management section because he was very busy. The person realized it and asked the Secretariat to add the new vessel on the ICCAT list, more than 45 days after the license was issued. The new longline vessel was built in Japan in 2018 and luckily stayed in a Japanese port for preparing her fist voyage during the non-registration at ICCAT. In order to prevent further mistake, Japan's authority ensured at least two staffers working for such registrations for the crosschecks.	Yes
	Rec. 12-07: No list of designated ports	Japan submitted in July the Secretariat list of its authorized ports for foreign fishing vessels.	Yes
Catch limits/quotas	Overharvest of S-ALB.	For the 2018 fishing year, when the total	N/A

		catch was approaching the limit, the Fisheries Agency started to require a daily catch report and ordered fishing vessels to leave the fishing ground for S-ALB. Those actions prevented Japan from overshooting the S-ALB catch limit for the 2018 season.	

التاريخ : 2019 10 17 / / 20.....م

الإشاري : Ref. LB-001C



دولة ليبيا
وزارة الزراعة والثروة الحيوانية والبرية

To : Mr. Derek Campbell

Compliance Committee Chair (COC)

International Commission for the Conservation of Atlantic Tunas (ICCAT)

SUBJECT : RESPONSE ON COC 's LETTER REGARDING COMPLIANCE ISSUES IN 2018/LIBYA

Dear Mr. Derek ,

With reference to your Letter dated 18-09-2019 concerning above mentioned subject.

We would like to inform you that Although Libya has doing its best to enhancing its commitment to iccat recommendations, but there were many challenges still makes difficulties, however effected on officials' performances improvement.

Also changes of officials makes difficulties to arrange and regularly submit requirements

So, Libya has recognized the deficiencies mentioned in above mentioned letter and likes to clarify as:

- due to the officials' changes, Libya has some difficulties to arrange national scientific observer programme with, and may need iccat help to have this programme next year.
- regarding providing data of N-SMA, Libya has no this species of shortfin Mako shark associated with iccat catch.
- For implementation shark, turtle by-catch/discard, Libyan fisheries rules transposed iccat recommendations e.g. decree No. 33/2019 which prohibited fishing shark, turtle and sea bird. where Libya has only purse seiners in 2108 and no incident by-catch of shark, either turtle or seabird was recorded, also the fishermen advised and instructed every year prior the season to release live these species if any as by-catch with targeted iccat fish and record as by-catch in log book. we apologize for this omission and arranged to avoid this in next reports.

Date 2019, 10, 12 / التاريخ: 2019 / 10 / 12

Ref: No: CB-0016 / الإشاري: CB-0016



دولة ليبيا
وزارة الزراعة والثروة الحيوانية والبيئ

- management plan of SOW-MED was provided late, that was a miss-arrangement due to the previous officials whom following the iccat requirements, we apologize.

- Libya is currently making new regulations to cover all the requirements of RFMOS including Iccat, Libya also listed some authorized sharks species which may be landed, these shark species caught by traditional fisheries, and are not associated with iccat fisheries.

many instructions and rules for managing non targeted fish in distant and international waters, we draw attention of officials to follow guideline for preparing annual report and these omissions will not have repeated in future.

In view of above, Libya kindly requests the commission through your coc to accept above clarifications and abolishing these deficiencies.

Please accept my highest consideration

Elhadi Mohamed Etorjmani

Head Delegate of Libya to ICCAT



COMPLIANCE LETTER RESPONSE TEMPLATE

2018 Commission Meeting			
CPC: LIBYA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year: replied		COC Chair letter been replied. lately the letter dated 18/9/19 also replied and sent on 17/10/19.	
Annual Report	Scientific	National report sent to ICCAT with two parts, discussed during last meeting 2018 by the previous Libyan team, the raised deficiencies were noted and recognized, then responded and covered in next reports.	
	General (management)		
Statistical data reporting	Rec. 16-14: National scientific observer programme data (ST09) received blank.	Due to the official changes, Libya has some difficulties to arrange national scientific observer programme, may be needs ICCAT assistance in this issue through training of our officers and scientists. Apologizes and omission covered in next reports.	
MCS Measures	Rec. 17-08: No response to request for SMA catches.	Shark species are not targeted in ICCAT fisheries, and no by-catch was recorded for this species. But fishermen had advised to record and release any sharks.	
	Rec. 10-09; 11-09; 11-10, 16-12: (by-catch requirements) responses may be insufficient.	Libyan fisheries rules transposed ICCAT recommendations e.g. decree No. 33/2019 which prohibited fishing shark, turtle and sea bird. where Libya has only purse seiners in 2108 and no incident by – catch of shark, either turtle or seabird was recorded, also the fishermen advised and instructed every year prior the season to release live these species if any as by-catch with targeted ICCAT fish and record as by – catch in logbook. we apologize for this omission and these covered in next reports.	
	Rec. 16-05: SWO MED management plan received late.	Due to the changes of officials, previous team had presented plan of SOW-MED late, but no	

		fisheries been activated, we apologize for this omission.	
	Rec. 16-13: Not clear if legally binding measures have been taken to implement all shark requirements.	Libya is currently making new regulations to cover all the requirements of RFMOS including ICCAT, Libya also listed some authorized sharks species which may be landed, these shark species caught by traditional fisheries, and are not associated with ICCAT fisheries.	

AGRICULTURE CONAPESCA

General Directorate of Planning, Programming and Evaluation

Official Communication No. DGPPE.-05815/270919

Mazatlán, Sinaloa, 10 October 2019

Mr. Camille Jean Pierre Manel
Executive Secretary of the
International Commission for the Conservation of Atlantic Tunas (ICCAT)

I have the pleasure to address you in connection with ICCAT communication No. 6574 of 18 September 2019, and the commitments acquired by Mexico within the framework of the 21 Special Meeting of the International Commission for the Conservation of Atlantic Tunas (ICCAT), held from 12 to 19 November 2018 in Dubrovnik, Croatia, where issues were identified related to reporting and implementation by Mexico for the following requirements:

- **“Not applicable”**
A duly completed table has been attached, with the corresponding clarification. This requirement has been noted for future occasions.
- **“Rec. 12-07: Recommendation by ICCAT for an ICCAT scheme for minimum standards for inspection in port”**
Regarding this point, the Government of Mexico wishes to express that it is fully willing to adopt measures to strengthen the Monitoring, Control and Surveillance Scheme, so as to promote implementation and compliance with ICCAT management and conservation measures. The duly completed format CP24-AuthPort has been attached.
- **“Rec. 16-13: Recommendation by ICCAT on improvement of compliance review of conservation and management measures regarding sharks caught in association with ICCAT fisheries”**
Mexico wishes to inform that it is aware of the need to facilitate the review process by the Secretariat, and also to comply with the conservation and management measures regarding sharks caught in association with ICCAT fisheries. The duly completed format ShkCkSheet has been attached.

I take the opportunity to reiterate that Mexico takes into consideration the work of the Secretariat when it comes to compliance with Convention objectives and maintains its commitment to implementing the management measures of the species regulated by ICCAT in favour of responsible and sustainable fishing.

In addition, I would like to comment that the resolutions and recommendations issued by the International Commission are legally binding for our country, and therefore these commitments must be honoured.

I appreciate your attention in this matter, and I take the opportunity to extend my greetings to you.

Your sincerely,

DIRECTOR GENERAL OF PLANNING, PROGRAMMING AND EVALUATION

(signed and sealed)
BERNARDINO JESÚS MUÑOZ RESENDEZ

COMPLIANCE LETTER RESPONSE TEMPLATE

2018 Commission Meeting			
CPC: MOROCCO			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATA MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year			
Annual Report	Reporting summary-Section 3 in Part II is incomplete (blank in response to some requirements and “not applicable” not explained in all cases).		<p>- Annual Report Section 3/Part II of the Annual Report containing the clarifications/additional information from Morocco was communicated to the ICCAT Secretariat on 19/10/2018 after correction and updating.</p> <p>Therefore, all parts have been completed, and all the references to not applicable have been explained.</p>
Statistical data reporting	Rec. 16-14: No national scientific observer programme data (ST09) received.		<p>- National scientific observer programme (ST09) Morocco's response to requirement S10 is described in requirement S11 which was submitted to the Secretariat on 27/07/2018 and which states that due to the artisanal nature of most of the tuna fisheries, it is difficult to implement a scientific observer programme. However, an alternative data collection method is described in the response to requirement S11. The data collected under this requirement have already been reported in the 2018 national report. It should be noted that trap data and for two purse seine vessels targeting bluefin tuna in the</p>

			Mediterranean will be collected and reported to the Secretariat in 2019 on form ST09.
MCS Measures	Rec. 15-05 / 16-11 : no information presented.		<p>ICCAT Conservation and Management Measures (Rec. 15-05)/ Marlins</p> <p>Morocco does not have a fleet targeting marlins. Catches of these species are taken incidentally and reported to the ICCAT Secretariat in Task I and Task II. It should also be noted that Morocco does not have any recreational fisheries directed at these species.</p> <p>It should also be indicated that Moroccan monitoring and control measures covering all fishing activities regardless of the species and including marlins. In particular, these measures consistent of:</p> <ul style="list-style-type: none"> • Control at landing ports, fishing sites and fish markets. • Satellite-based vessel control (VMS); • At sea control of vessels is carried out by the control authorities. <p>A system of mandatory reporting of catches on landing and monitoring of trade flow through the certification procedure, for the overall purpose of deterring IUU fishing.</p> <p>ICCAT Conservation and Management Measures (Rec. 16-11)/Atlantic sailfish)</p>

			<ul style="list-style-type: none"> In Morocco, sailfish has never been included in Moroccan statistics. Morocco's nil catch data for sailfish are reported to ICCAT every year in the Annual Report and Task I and II.
	Rec. 10-09 / 11-10 : no information presented.		<p>ICCAT Conservation and Management Measures / Rec. 10-09 and Rec. 11-10</p> <p>Morocco has transposed ICCAT Recommendation 03-04 by adopting Law 19-07 and its Implementing Decree prohibiting drift nets off its coasts.</p> <p>It should also be indicated that a draft ministerial order is in the process of being adopted by the relevant Moroccan legal services which aims to prohibit fishing for sea turtles and sea birds off all the Moroccan coasts, and it is expected to be published this year.</p>
	Rec. 16-13 : It is possible that no legally binding national measure has been adopted to implement the measures applying specifically to porbeagle shark and silky shark.		<p>-Morocco's shark check sheet was sent to ICCAT in 2017 and was updated and transmitted to ICCAT in 2018.</p> <p>-All Task I and II shark data are reported annually to ICCAT.</p> <p>-Regarding shark legislation, Morocco has transposed the shark measures adopted by ICCAT into its national regulations such as the adoption of a ministerial order</p>

			<p>prohibiting fishing, landing and trade of 3 shark species, i.e. hammerhead shark, oceanic whitetip shark and bigeye thresher shark.</p> <p>For silky shark which is not included in Moroccan statistics and porbeagle shark which is rarely landed, Morocco has implemented some conservation, monitoring and control measures such as control at ports and fishing sites and fish markets, vessel control by VMS, at sea vessel control carried out by control authorities as well as a mandatory reporting system of catch on landing and monitoring of trade flow through the catch certification procedure.</p>
Catch limits/quotas	Task I data indicates an overharvest of blue marlin, but no compliance table (Rec. 11-11) for marlins submitted.	Morocco proceeded to close the marlins fishery until the overharvest was corrected.	Compliance table (Maroc_CP13-COC_Sec_FR31072018) was submitted to ICCAT on 31/07/2018 and revised following this request.
- Other issues			

The Executive Secretary,
ICCAT, Madrid,
Spain

RE: LETTER ON COMPLIANCE ISSUES

ATTENTION: COMPLIANCE COMMITTEE CHAIR

Nigeria wish to acknowledge the receipt of your Letter reference number 6574 dated 18th September, 2019, bordering on compliance issues. As earlier stated in the annual report summary submitted to the Secretariat, by Nigeria, the situation of tuna fisheries in Nigeria still remain the same.

Nigeria has no tuna fishing vessel and has not entered into any kind of Access Agreement with any country on ICCAT fisheries. Nigeria has no quota for any ICCAT fisheries and therefore has no data to report in the compliance table form CP13- COC as required in REC. 11 -11.

AS regards the authorized ports, it is important to state here that Nigeria has no designated ports where ICCAT fisheries are landed because Nigeria has no tuna fishing vessels and no foreign tuna fishing vessels land fish in Nigeria. Therefore there is no relevant information to report on form CP 24 as required.

As regards the reporting and implementation deficiencies noted, with regards to shark implementation check sheet, it is also important for Nigeria to draw the attention of the Compliance Committee to the fact that Nigeria is not involved in directed shark fisheries (commercial or recreational shark fisheries). However, the Nigerian Sea fishery Act and Sea Fisheries (fishing) Regulations prohibits heading, gutting and finning of sharks and to ensure compliance the fisheries inspectors duly carry out inspection on the landings and fishing logbook at landing jetties.

On the issue of non-reply to the previous COC Letter, Nigeria expressed regret when the issue was raised in the last Commission meeting in Croatia. IT was due to the fact that the letter was routed to an email address that was not accessible due to some technical problem and this error has been corrected with the Secretariat. Nigeria appreciates the excellent work of the Compliance Committee and is fully aware that lack of full implementation of ICCAT requirements can undermine the work of the Commission in fulfilling the Convention's objectives. Nigeria would continue to do her best to ensure compliance with ICCAT requirements.

Please accept the assurances of the Honourable Minister's highest consideration.

Thank you.

Hyacinth A Okpe
Head Delegate
ICCAT Nigeria.
For Honourable Minister

REPUBLIC OF PANAMA

MINISTRY OF AGRICULTURAL DEVELOPMENT

GENERAL ADMINISTRATION OFFICE

Panama, 19 September 2019
AG-0796-2019

Honourable Mr. Derek Campbell
Compliance Committee Chair
International Commission for
the Conservation of Atlantic Tunas (ICCAT)

Ref.: Letter on compliance issues

Dear Mr. Campbell,

The Aquatic Resources Authority of Panama extends its greetings to you and I congratulate you on the excellent work that you carry out as Compliance Committee Chair of the International Commission for the Conservation of Atlantic Tunas.

We would also like to take this opportunity to reply to your letter with ICCAT salida No. 6574 of 18 September 2019 regarding the letter on compliance issues corresponding to the Republic of Panama, according to the subjects discussed at the last Commission meeting in Dubrovnik, Croatia, held from 12 to 19 November 2018.

In relation to these subjects, we would like to inform that following conclusion of the meeting of the Compliance Committee, we proceeded to carry out a number of actions to improve internal processes to ensure compliance the following year. Unfortunately, due to situations related to administrative management, there were delays with the actions to collect the data that are directly included in the compliance reports.

It is important to highlight that, in spite of reporting issues, the information provided by the Republic of Panama does not contain elements of great concern in terms of the activities of our fleet.

As to Rec. 13-14 on chartering agreements and the termination that was submitted late, it is important to note that we considered that the information provided by the chartering Government was acceptable and that is was not necessary to reiterate the information already provided and in copy to Panama's contacts. For future cases, we will take the necessary steps on our side.

Finally, I would like to inform that we have attached herewith the response table, in accordance with the template that we received.

Please accept the assurances of my highest consideration.

Your sincerely,

(signed and sealed)

Flor de M. Torrijos O.
General Administrator

COMPLIANCE LETTER RESPONSE TEMPLATE - PANAMA

2018 Commission meeting:			
CPC PANAMA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATA MISSING/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year: late response		The Authority was re-structured to delegate specific functions for subjects related to international bodies.	2018 reply letter was sent on 25 September 2019.
Annual Report	Annual Report received late (during the annual meeting).	The annual report will be submitted by the corresponding deadline, however, due to issues linked to change in Administration, establishment of a Compliance Committee has commenced to ensure compliance with all our obligations towards bodies.	
Statistical data reporting	Statistical data received late (following data preparation for the SCRS)	2018 statistical data were submitted on time	2 September 30 August
MCS measures	Rec. 17-08: no response to the request for shortfin mako shark catches	The shortfin mako shark catch report was submitted.	4 October
	Rec. 13-14: information on chartering agreements and their termination submitted late (up to 10 months after the commencement of the agreement).	We considered that the information provided by the Government of Namibia was acceptable and we did not consider it necessary to reiterate information already provided and in copy to Panama's contacts. For future cases, we will take the necessary steps on our part.	

	Rec. 16-01: quarterly bigeye tuna reports received late.	The Authority was re-structured to delegate specific functions for subjects related to international bodies.	
	Rec. 17-07: the Secretariat has raised the issue that VMS transmissions are responded to or followed up by Panama on few occasions.	We have implemented an upgrade at our control centre and we are in the process of registering each of the CSP to initiate connectivity with our new system.	
	Rec. 16-13: possibly no legally binding measures to implement shark requirements.	Detailed information on implementation and compliance with shark conservation and management measures was not submitted to the ICCAT Secretariat (Recs. 04-10, 07-06, 09-07, 10-06, 10-07, 10-08, 11-08, 11-15, 12-05, 14-06 y 15-06). We are currently submitting the information.	25 September
Catch limits / quotas	Rec. 11-11: compliance tables submitted late. Task I indicates overharvest of BUM, but the BUM compliance table has not been submitted.	Overharvest of BUM catch has been included in the table to be submitted this year with detailed information.	26 September

RUSSIA



Federal Agency for Fishery
RUSSIAN FEDERAL «RESEARCH INSTITUTE
OF FISHERIES AND OCEANOGRAPHY»
«VNIRO»
Atlantic branch of VNIRO («AtlantNIRO»)

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Compliance Committee Chair
Derek Campbell

cc: Commission Chairman
Raul Delgado

cc: Executive Secretary of ICCAT
Camille Jean Pierre Manel

16/10/2019 № 11/1445

October 16, 2019

Dear Derek Campbell,

In response to the letter on compliance issues № 6574 dated 18/09/2019, we inform that Russia, as one of the founding members of ICCAT, when engaging in any type of fishery in areas where tunas and tuna-like species are observed in catches, applies the current ICCAT measures concerning restrictions and a ban on fishery of quoted species.

At present Russia doesn't conduct a specialized fishery for tunas and tuna-like species. Tunas from the group "Small tunas" are occasionally occurred as a by-catch during trawl fishing in the Eastern-Central Atlantic area. Horse mackerels, sardine, sardinella and mackerel are target species of trawl fishing. Observers working on trawlers annually collect information on by-catch fish and monitor the presence of turtles, sea mammals and seabirds in trawl catches. The processed data on tunas and sharks in the form of tables Task I and Task II are submitted to the ICCAT Secretariat within a specified time.

Russia fully supports the ICCAT actions aimed at implementing resolutions, recommendations and reporting requirements as well as complying with ICCAT decisions. Referring to the above ICCAT letter, we inform as follows:

1. In accordance with the Recommendation 16-14, we additionally completed reporting forms ST09-NatObPrg and will send them to the ICCAT Secretariat (tables of format ST09-NatObPrg are attached). Many table columns are left blank, because the table format only partially envisages working with by-catch during trawl fishing for target species of fish (herrings, horse mackerels).

In previous years, as before in 2019, these tables were not completed due to the lack of the specialized fishery for tunas and tuna-like species. In other words, in the absence of such a fishery, the "national scientific programme" cannot exist. Data was sent as an initiative.

2. In accordance with the Recommendations 11-10, 15-05 and 16-11, an observer who was aboard one of the trawlers fishing herrings, horse mackerels and other bony fishes in 2018, monitored in the by-catch except tunas, the presence of sharks, swordfishes, turtles and sea mammals. The observer didn't register named species in the surveyed catches, except sharks. Most likely, midwater trawling was carried out on sites and in areas where the abundance of sea turtles, swordfishes and sea mammals was low and (or) there were no named species interactions with this fishing gear.

In 2018 observers continued to collect data on sharks (table is attached). Information on sharks based on results of works of 2018 was processed both in the form of tables Task I and Task II

and was sent to ICCAT (08/07/2019). In addition, data on sharks is included in the Annual Report 2018-2019 (16/08/2019) and in accordance with the Rec. 16-13, the Shark Implementation Check Sheet was completed in 2018.

Recommendations on the need to release turtles if they were caught (entangled) and returned to the sea, had already been sent to the shipowners of the trawlers in advance.

3. Measures required by the Rec. 16-13 regarding sharks, were carried out. The “Recommendation by ICCAT on improvement of compliance review of conservation and management measures regarding sharks caught in association with ICCAT fisheries” [Rec.16-13] indicates sharks caught in the specialized fishery. Russian data on sharks was presented in the Annual Report 2018-2019 on the basis of trawler by-catch. The fishery of Russia at present cannot be called the “ICCAT fisheries”.

Nevertheless, there are measures in Russia that ensure the conservation of shark stocks and regulate fishing. Every year, without fail, the Federal Agency for Fishery transmits, after the ICCAT regular meeting, the ICCAT Recommendations and Resolutions to administrative structures, scientific and fisheries organizations. The orders of the Federal Agency for Fishery are mandatory, therefore, they can be considered as “legally binding measures”. This ensures that norms specified in the ICCAT documents are respected in conducting fishing operations.

Thank you for your attention to our materials and the Annual Report. We would very much appreciate if you let us know if you are satisfied with our response to your letter №6574 to the emails: obulatov@vniro.ru; atlantniro@atlantniro.ru.

Table

Observer data on the shark by-catch collected by Russian trawlers and some parameters of sharks in 2018

Species (English name)	Species (Latine name)	Months	Measur ement analysis (ex.)	Coordinates	Length of fish TL from to cm	Mean length TL	Sex M F
Blue shark	<i>Prionace glauca</i>	8, 9, 10, 11, 12	$\frac{45}{36}$	21°17' - 23°52' N	76-160	99,0	$\frac{18}{18}$
Shortfin mako	<i>Isurus oxyrinchus</i>	9	$\frac{1}{1}$	23°32' N	92	92,0	$\frac{0}{1}$
Smooth hammerhead	<i>Sphyrna zygaena</i>	8, 10, 12	$\frac{5}{2}$	21°17' - 22°49' N	74-154	96,4	$\frac{0}{2}$
Goblin shark	<i>Mitsukurina owstoni</i>	5	$\frac{1}{0}$	18°46' N	218	218,0	

Respectfully yours,

Konstantin Bandurin
Head of AtlantNIRO

COMPLIANCE LETTER RESPONSE TEMPLATE

2018 Commission Meeting		9	
CPC: RUSSIA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year: replied			
Annual Report			
Statistical data reporting	Rec. 16-14: No national scientific observer programme data (ST09) received.	In accordance with the Recommendation 16-14, we additionally completed reporting forms ST09-NatObPrg and sent them to the ICCAT Secretariat (tables of format ST09- NatObPrg are attached). Many table columns are left blank, because the table format only partially envisages working with by-catch during trawl fishing for target species of fish (herrings, horse mackerels). In previous years, as before in 2019, these tables were not completed due to the lack of the specialized fishery for tunas and tuna-like species. In other words, in the absence of such a fishery, the "national scientific programme" cannot exist. Data was sent as an initiative.	(16/10/2019)
MCS Measures	Rec. 11-10,15-05 and 16-11: Responses may be insufficient.	In accordance with the Recommendations 11-10, 15-05 and 16-11, an observer who was aboard one of the trawlers fishing herrings, horse mackerels and other bony fishes in 2018, monitored in the by-catch except tunas, the presence of sharks, swordfishes, turtles and sea mammals. The observer didn't register named species in the surveyed catches, except sharks. Most likely, midwater trawling was carried out on sites and in areas where the abundance of sea turtles, swordfishes and sea mammals was low and (or) there were no named species interactions with this fishing gear. In 2018 observers continued to collect data on sharks (table is attached). Information on sharks based on results of works of 2018 was processed both in the form of tables Task I and Task II and was sent to ICCAT (08/07/2019). In addition, data on sharks is included in the Annual Report 2018-2019 (16/08/2019) and in accordance with the Rec. 16-13, the Shark Implementation Check Sheet was completed in 2018.	(08/07/2019) (16/08/2019)

	<p>Rec. 16-13: Possibly no legally binding measures to implement shark requirements.</p>	<p>Measures required by the Rec. 16-13 regarding sharks, were carried out. The <i>“Recommendation by ICCAT on improvement of compliance review of conservation and management measures regarding sharks caught in association with ICCAT fisheries”</i> [Rec.16-13] indicates sharks caught in the specialized fishery. Russian data on sharks was presented in the Annual Report 2018-2019 on the basis of trawler by-catch. The fishery of Russia at present cannot be called the “ICCAT fisheries”.</p> <p>Nevertheless, there are measures in Russia that ensure the conservation of shark stocks and regulate fishing. Every year, without fail, the Federal Agency for Fishery transmits, after the ICCAT regular meeting, the ICCAT Recommendations and Resolutions to administrative structures, scientific and fisheries organizations. The orders of the Federal Agency for Fishery are mandatory, therefore, they can be considered as “legally binding measures”. This ensures that norms specified in the ICCAT documents are respected in conducting fishing operations.</p>	
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COMPLIANCE LETTER RESPONSE TEMPLATE

2018 Commission Meeting			
CPC: SENEGAL			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATA MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year			
Annual Report			
Statistical data reporting	Rec. 16-14: No national scientific observer programme data (ST09) received.	Yes, there is no scientific observation programme even though the traditional observer programme has scientific aspects. It is within this framework that Recommendation 16-14 to establish minimum standards for observer programmes was transposed by Order No. 22787 of 22 August 2019. Its implementation is in progress and Senegal is developing a support project for the observer programme.	
MCS Measures	Rec. 17-08: The response to the request for data on shortfin mako shark was received late.	Data on shortfin mako shark are submitted to ICCAT through the Task II report.	
	Rec. 16-13: No legally binding measure has been taken regarding requirements applicable to sharks.	Senegal has just transposed the recommendation on conservation measures for shortfin mako shark through Order No. 22782 of 27 August 2019 which is binding. This provision is taken into account by all control services of landings and fisheries products.	

Catch limits and quotas			
- Other issues			

Syrian Arab Republic
Ministry of Agriculture and Agrarian Reform
General Commission for Fisheries Resources



Ref: 2647
Date: 16/20/2019

SUBJECT: REPLY TO THE LETTER ON COMPLIANCE ISSUES

Dear Sir,

Referring to your letter dated 18 September 2019 regarding certain reporting and implementation deficiencies for Syria .

We would like to clarify the following:

- Fishing in Syria considered as small- scale, majority of fishing vessels belong to the artisanal sector, the marine fleet consists of 1850 feluccas (open boats of 4-6 m in length), which operate in territorial water within 6 nautical miles using commonly gill nets with no commercial fishing operations, only 2 vessels recorded in ICCAT record of vessels and can operate in high seas only during BFT fishing season. Scientific program data applied in landing centers, where fisheries officers distributed to cover all landing centers in Syria, data on total catch and species were collected regularly. Regarding scientific program, we request ICCAT Secretariat for technical assistance in training program of two fisheries officers on data collection and reporting.
- Syria has only one designated port for high seas fishing vessels, i.e. Latakia port , so Latakia the only authorized port for BFT landing in Syria, we confirm that the BFT port list will be sent in proper time adopted by ICCAT in coming years.
- We confirm that Syrian fleet not targeting blue or white Marlin and no catch of Marlin recorded previously in Syria, regarding sea turtles, fisheries authorities protecting sea turtles and educating fishermen how to deal and to handle and release entangled turtles, all fishermen aware of the importance of turtles for marine life.
- Fisheries catch in Syria considered as multispecies and no fish discards as all dead fish landed by artisanal fishermen, bycatch

negligible as limited number of commercial vessels operated in Syrian waters, we confirm that all bycatch of turtles and sharks released unharmed .

- Sharks are not actively targeted by the national fishermen, sharks not popular as food with no catch recorded in previous years from ICCAT managed species. So vessels flying Syrian flag are not likely to catch any sharks species covered by ICCAT recommendations, the photos and identification characters of shark species distributed in all landing centers for all fishermen to avoid and release ICCAT managed sharks.
- Landing centers in Syria are domestic, facilities and services not designated to receive foreign fishing vessels, besides the law don't allow foreign vessels to enter, and any foreign vessel should enter to commercial port. We request for technical assistance in training of fisheries officers on developing and implementing of an effective system of port inspection.

General Commission for Fisheries Resources in Syria doing all available means to improve fisheries management and statistical data collection, but because of circumstances and illegal sanctions since 2011 there are scarcity of expertise in several fisheries and aquaculture fields.

We request for technical support and training programs regarding resource management (data collection and port inspection) to insure more cooperation and best implementation of ICCAT recommendations in future to come.

Please accept the assurances of my highest consideration.

Dr. Abdel latif ALI
Director General of
General Commission for Fisheries Resources



COMPLIANCE LETTER RESPONSE TEMPLATE

2018 Commission Meeting			
CPC: SYRIA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year: replied			
Annual Report			
Statistical data reporting	Rec. 16-14: No national scientific observer programme data (ST09) received.	Scientific program data applied in landing centres, where fisheries officers distributed to cover all landing centres in Syria, data on total catch and species collected regularly. Regarding this matter, we request ICCAT Secretariat for technical assistance in training program of two fisheries officers regarding data collection and reporting.	
MCS Measures	17-07: Minor delay in submitting authorised BFT port list.	Syria has only one designated port for high seas fishing vessels, i.e. Latakia port, so Latakia the only authorized port for BFT landing in Syria, we confirm that the BFT port list will be sent in proper time adopted by ICCAT in coming years	INFORMATION SENT
	Recs. 15-05, 10-09 and 11-10: responses may be insufficient.	Syrian fleet not targeting blue or white Marlin and no catch of Marlin recorded previously in Syria. No fish discards as all dead fish landed we confirm that all by-catch of turtles and sharks released unharmed	
	Rec. 16-13: No legally binding measures to	vessels flying Syrian flag are not likely to catch any sharks species covered by ICCAT	

	implement shark requirements.	recommendations	
	Rec. 12-07: No list of designated ports.	Landing centres in Syria are domestic, facilities and services not designated to receive foreign fishing vessels, We request for technical assistance in training of fisheries officers on developing and implementing of an effective system of port inspection.	



GOVERNMENT OF THE REPUBLIC OF TRINIDAD AND TOBAGO
MINISTRY OF AGRICULTURE, LAND & FISHERIES
Fisheries Division

*#35 Cipriani Blvd., Newtown, Port of Spain, Trinidad and Tobago, West Indies,
Phone: 623-6028, 623-8525 Fax: 623-8542*

16 October, 2019

Mr Derek Campbell
Compliance Committee Chair
International Commission for the Conservation of Atlantic Tunas (ICCAT)
Corazón de María
8 – 28002 Madrid
SPAIN

FISHERIES DIVISION
DISPATCHED

OCT. 16 2019

MINISTRY OF AGRICULTURE
LAND AND FISHERIES

Dear Mr Campbell

SUBJECT: LETTER REGARDING COMPLIANCE ISSUES IN 2018

The Delegation of Trinidad and Tobago conveys its commendations to the Commission and its Secretariat and wishes to reaffirm its commitment to conservation and management of the Atlantic tuna and tuna-like fisheries for long term sustainability of the resources and the benefit of current and future generations.

Reference is made to your letter dated 18 September 2019 which seeks a response from Trinidad and Tobago on the following compliance deficiencies noted by the Compliance Committee for the country:

- Part 1 of Annual Report was received late.
- Rec. 16-14: No national scientific observer programme data (through form ST09) received. and, domestic scientific observer program not yet implemented.
- Rec. 12-07: No list of authorised ports submitted, or port inspection reports received.
- Recs. 10-09 and 15-05: Measures for turtles and marlins not yet implemented.
- Rec. 16-13: No legally binding domestic measures adopted to implement shark requirements.
- Overharvest of BUM and WHM.

Please find attached the completed template indicating the remedial action and date on which missing data or information was sent as they relate to each of the deficiencies identified.

Currently Trinidad and Tobago is receiving assistance from the Food and Agriculture Organization of the United Nations to improve its data collection system for the artisanal fleet and to develop an integrated information system for fisheries management decision-making, including improved reporting.

Trinidad and Tobago wishes to reassure the Compliance Committee of its continuing commitment to improving its conservation and management regime. In our correspondence of 5th October 2018 we had indicated that the Draft Fisheries Management Act was determined to be the most significant intervention required for Trinidad and Tobago's advancement with respect to compliance with its international obligations. We are pleased to report that the Draft Fisheries Management Bill has advanced through the pre-Legislation Review Committee process and is anticipated to be presented in Parliament by the end of 2019. As well, Trinidad and Tobago will be depositing its instruments of accession to the Port State Measures Agreement and acceptance of the Compliance Agreement by the end of 2019.

Trinidad and Tobago looks forward to participating in the 2019 Commission Meeting and extends assurances of its highest consideration.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Ramon Delgado', is written over a horizontal line.

Director of Fisheries/
Trinidad and Tobago Head Delegate
DIRECTOR OF FISHERIES

cc. M. Delgado, Commission Chair

COMPLIANCE LETTER RESPONSE TEMPLATE

2018 Commission Meeting			
CPC: TRINIDAD & TOBAGO			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year: replied			
Annual Report	Part 1 of Annual Report received late.	The 2019 Annual Report was submitted 15 September 2019 (on time).	Part 1 of 2018 Annual Report was submitted 26 September 2018.
Statistical data reporting	Rec. 16-14: no national scientific observer programme data (ST09) received - Domestic scientific observer program not yet implemented.	Trinidad and Tobago is currently without the legal and resource capacities to implement a scientific observer programme. The Draft Fisheries Management Bill, which will address the legal aspect, has advanced through the pre-Legislation Review Committee Process and is anticipated to be presented in Parliament by the end of 2019. Regulations are also being developed.	
MCS Measures	Rec.12-07: no list of authorised ports or port inspection reports received.	Trinidad and Tobago will be depositing its instrument of accession to the Port State Measures Agreement by the end of 2019. An assessment of ports for compliance with the Agreement on Port State Measures was conducted in August 2019, as part of a broader review of national fisheries monitoring, control and surveillance (MCS) systems, under an FAO-funded Project. The assessment report - expected to be	The list of authorised ports will be submitted following receipt of the final report of the port assessment.

		<p>submitted by the end of 2019 - will make recommendations as to which ports may be authorised.</p> <p>Additionally, a multi-agency Memorandum of Understanding for Collaboration in Regulating Fishing, Fishing Related Activities and Relevant Trade (MOU) was signed in August 2019 among agencies with responsibility for fisheries management, maritime services, customs and excise, national security and trade. This mechanism will serve to improve national capacity to conduct the requisite inspections at port, among other things.</p> <p>Currently the Fisheries Division is without the fisheries MCS capacity (including personnel) to conduct inspections at port, however, training for port inspectors from other agencies under the MOU is scheduled for the first quarter of 2020 under the above-mentioned FAO Project.</p>	
	Recs. 10-09 and 15-05: measures for turtles and marlins not yet implemented.	<p>Enactment of the draft Fisheries Management legislation is required for implementation of the measures. The Bill has advanced through the pre-Legislation Review Committee Process and is anticipated to be presented in Parliament by the end of 2019. Regulations are also being developed.</p> <p>The killing, capture and sale of turtles and turtle eggs is prohibited in</p>	

		<p>Trinidad and Tobago (Protection of Turtle and Turtle Eggs Regulations (2011).</p> <p>Since 2017, through policy decision the landing and export of blue marlin, white marlin and spearfish by non-artisanal pelagic longline vessels are prohibited.</p> <p>The Trip Reporting Form for the non-artisanal pelagic longline fleet has been updated to facilitate the recording of catch, bycatch and discards of non-target species (including turtles and marlins), to inform management decision-making.</p>	
	Rec. 16-13: no legally binding measures to implement shark requirements.	<p>The Draft Fisheries Management Bill has advanced through the pre-Legislation Review Committee Process and is anticipated to be presented in Parliament by the end of 2019. Regulations are also being developed.</p> <p>Trinidad and Tobago is also currently developing a National Plan of Action for the Conservation and Management of Sharks which will inform related conservation and management regulations.</p>	
Catch limits/quotas	Overharvest of BUM and WHM.	As a result of the prohibition of landing and export of BUM and WHM, the overharvest quantities have been reduced considerably. It is expected that landing and export will be allowed from 2021.	

COMPLIANCE LETTER RESPONSE TEMPLATE

2018 Commission Meeting			
CPC: TUNISIA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATA MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year			
Annual Report			
Statistical data reporting	Rec. 16-14: No national scientific observer programme data (ST09) received.	In accordance with ICCAT recommendations, Tunisia launched in 2011 a scientific observer programme for scientific monitoring of the bluefin tuna, swordfish and small tunas fisheries. The results of these actions are presented in different reports and as SCRS scientific papers. It should be noted that this programme was consolidated in 2019 by other scientific observers on board Tunisian purse seiners fishing for bluefin tuna. The coverage rate is greater than 10%. Form ST09 was submitted on the very day of the COC meeting held in Dubrovnik, i.e. 10/11/2018.	10/11/18 4/7/19
MCS Measures	Rec. 15-05 and 16-11: The response provided could be insufficient.	Atlantic sailfish is not a reported species in Tunisia. However, following comments made during the Annual Meeting of the Commission, a check sheet was submitted by the deadlines in accordance with the data reporting requirements of the Commission.	10/9/19
	Rec. 16-13: No legally binding measure has been taken regarding requirements applicable to sharks.	In Tunisia, sharks are not on the list of target species. However, a shark information collection monitoring programme has been implemented. A check sheet was submitted by the deadlines, in accordance with the data reporting requirements of the Commission.	10/9/19



REPUBLIC OF TURKEY
MINISTRY OF AGRICULTURE AND FORESTRY
Directorate General of Fisheries and Aquaculture

Ref. No: 67852565-730.99

08/10/2019

Subject: Letter on Compliance Issues

To: Mr. Derek CAMPBELL

Compliance Committee Chair

International Commission for the Conservation of Atlantic Tunas (ICCAT)

Corazón de María, 8 - 28002

Madrid, SPAIN - ESPAÑA

Dear Mr. Campbell,

First of all, I would like to express my sincere gratitude to learn that you were getting better and fully recovered from the health issue you had a few months ago.

With respect to your letter dated 18 September 2019 (ref.no.6574), I would like to start to our side's response by emphasizing that Turkey is quite committed to ensure full implementation of ICCAT requirements to expedite the work of the Commission in fulfilling the Convention's objectives.

In Turkey, shark species are rarely encountered within the scope of by-catch or incidental fishing, and no shark species are subject to any fisheries as a target species in terms of commercial and/or subsistence fisheries and local consumption.

Fishing, retaining on-board, transshipping, landing, storing, selling, or offering for sale of certain sharks species are strictly forbidden under domestic regulations. With the recent amendment made on the Ministerial Notification 4/1 on Regulating Fisheries for Commercial Purposes (effective for the period of September 1, 2016 - August 31, 2020) through the Official Gazette dated 19 April 2018 (no: 30396); the scope of the aforementioned prohibition was extended to cover some additional pelagic shark species pursuant to the relevant recommendations of GFCM and ICCAT.

Nonetheless, Turkey reserves the right to grant permission in the future towards fishing for those shark species that are allowed to be caught and managed under the purview of ICCAT Convention, provided that such fishing activities are carried-out in line with the provisions of the applicable ICCAT recommendations and that they are strictly following the principles of sustainable and responsible fisheries.

Pursuant to Article 16 of the Notification 4/1 on Regulating Fisheries for Commercial Purposes that provides for a legally binding domestic measure for fisheries; Fishing for, retaining on-board, transshipping, landing, storing, selling, or offering for sale of the below-listed sharks species is prohibited at all marine and inland waters:

- Sandbar shark (*Carcharhinus plumbeus*)
- Basking shark (*Cetorhinus maximus*)
- Tope shark (*Galeorhinus galeus*)
- Porbeagle (*Lamna nasus*)
- Picked dogfish (*Squalus acanthias*)
- Smoothback angelshark (*Squatina oculata*),
- Angelshark (*Squatina squatina*)
- Sawback angelshark (*Squatina aculeata*)
- Common guitarfish (*Rhinobatos rhinobatos*)
- Blackchin guitarfish (*Rhinobatos cemiculus*)
- Angular roughshark (*Oxynotus centrina*)
- Devil fish (*Mobula mobular*)
- Spinetail mobula (*Mobula japonica*)

- Tresher shark (*Alopias vulpinus*)
- Shortfin mako (*Isurus paucus*)
- Thornback ray (*Raja clavata*)
- Longnose spurdog (*Squalus blainville*)
- Mantas (*Myliobatidae*)

With reference to the provisions of the Notification on Commercial Fisheries in respect of by-catch (i.e., Article 17); except for the species prohibited to be caught under Article 16, fishers may be allowed to retain on-board species that are caught incidentally, on the condition that such by-catches do not exceed by weight 5% of the total catch on-board of the fishing vessel.

Certain shark species – although observed or reported very seldom – can be caught incidentally by the Turkish fishermen. In the case that the by-caught sharks are prohibited from fishing and landing, live individuals are released to the sea and the dead ones are discarded by the fishers after being duly recorded as required by the Ministry.

As concerns the shark species that are allowed to be retained on-board as by-catch; such bycaught sharks may only be landed from the ports designated as landing spots for Bluefin tuna and Swordfish. Inspectors from Ministry of Agriculture and Forestry perform regular checks and inspections towards ICCAT species as well as species bycaught at identified landing spots and/or sales points to ensure compliance with by-catch limitations and other rules. The products found to be caught illegally are seized and perpetrators are subject to administrative fines.

With a view to introducing some additional species-specific shark measures in the context of the ICCAT Convention and relevant recommendations; a new instrument, namely, “Ministerial Communiqué on the Conservation of Shark Species incidentally caught as By-Catch in Fisheries of Tuna / Tuna-like Species at Seas”, has been scheduled to enter into implementation next year, as from September 2020. The entry into force of the said instrument will follow the renewal date of the Notification on Commercial Fisheries for the period 2020-2024.

The details of the additional measures envisaged to be introduced by the new legal instrument, “Ministerial Communiqué on the Conservation of Shark Species incidentally caught as By-Catch in Fisheries of Tuna / Tuna-like Species at Seas”, have been provided to the ICCAT Secretariat on 1 October 2019 via our side’s e-mail in response to the requirement for submission of Shark Implementation Check Sheet.

Let me reiterate that our side shall always stand ready to cooperate for ensuring the success of the conservation and sustainable management efforts that are being exerted by ICCAT towards the shark species, and please accept the assurances of my highest consideration.

Sincerely yours,

Turgay TÜRKYILMAZ
Head Delegate of Turkey to ICCAT
Deputy Director-General
General Directorate of Fisheries and Aquaculture
Ministry of Agriculture and Forestry

Appendices: Compliance Letter Response by Turkey (1 page)

To. Mr. Derek CABELL, Compliance Committee Chair
International Commission for the Conservation of Atlantic Tunas (ICCAT)
Corazón de María, 8 – 28002
Madrid, SPAIN – ESPAÑA

Cc. Mr. Camille Jean Pierre MANEL
Executive Secretary
International Commission for the Conservation of Atlantic Tunas (ICCAT)
Corazón de María, 8 – 28002
Madrid, SPAIN – ESPAÑA

COMPLIANCE LETTER RESPONSE TEMPLATE

2018 Commission Meeting			
CPC: TURKEY			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year			
Annual Report			
Statistical data reporting			
MCS Measures	Rec. 16-13: Unclear if legally binding measures in place to implement some ICCAT species-specific requirements.	In response to the letter from the COC Chair, Turkey has provided detailed information about its current legally binding regulation with respect to sharks through a formal letter dated 8 October 2019. In the same letter, Turkey notified in written that the more detailed provisions regulating incidentally caught by-catches of certain shark species under the purview of ICCAT would be addressed and implemented through a new Ministerial Communique that is scheduled to be enacted in September 2020.	



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Derek Campbell
Compliance Committee Chair
Corazon de Maria, 8
28002 MADRID
Spain

14 October 2019

By email: info@iccat.int

Dear Mr Campbell,

UKOTS' REPORTED COMPLIANCE DEFICIENCIES FROM 2018

Thank you for your correspondence of 18 September 2019, on behalf of the International Commission for the Conservation of Atlantic Tunas (ICCAT), highlighting the United Kingdom Overseas Territories (UKOTs) compliance deficiencies in 2018. Please see attached the UKOT response.

The UKOTs apologise for these compliance issues, and the oversight in not submitting the information required. We strongly support the work of the Compliance Committee and believe that its work is essential to conserving the fish stocks within ICCAT's remit. We are working hard to further improve our compliance with ICCAT conservation and management measures this year. We are also having a full review and gap analysis of all of the implementation and data reporting requirements for the UKOTs, which should be a significant step in ensuring compliance in future years.

Kind regards,

Kylie

Kylie Bamford
Head of Marine Conservation

COMPLIANCE LETTER RESPONSE

2018 Commission Meeting			
CPC: UK-OT			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/ INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year: replied			
Annual Report			
Statistical data reporting	Rec. 16-14: no national scientific observer programme data (ST09) received.	<p>Currently the UKOTs do not have any national scientific observer programmes, nor did they in 2018.</p> <p>The reasons for this are: the size of the UKOTs' vessels, which are very small and therefore make observer deployment very challenging; and the resource and capacity issues the UKOTs face, being small and often remote islands, with limited local government resources and small populations. Please also note that Saint Helena's fishery, which is where the largest proportion of the catch is taken, is pole and line only, and lands all its fish at a central location, where metrics are taken by the StH Govt marine section staff – therefore the fishery is subject to significant data collection.</p> <p>We are currently conducting a full review and gap analysis of all of the implementation and data reporting requirements for the UKOTs, and will look at this requirement under Rec 16-14 – including the possibility of an exemption.</p>	

MCS Measures	Rec. 12-07: no list of designated ports.	<p>The UKOTs do not currently have any designated ports which allow access to foreign fishing vessels, nor did they in 2018.</p> <p>Their port facilities are limited, and used by small artisanal fleets which are inappropriate for larger, long distant fishing vessels. In force majeure cases, foreign fishing vessels could seek entry into port through the domestic procedures in place but would not land any proportion of catches due to the lack of market facilities.</p> <p>The UKOTs apologise for not supplying this information.</p>	
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COSTA RICA

INCOPESCA

24 October 2018
PESJ-292-2018

Mr. Derek Campbell
Compliance Committee Chair

Dear Sir,

I would like to extend my greetings to you. With regard to correspondence No. 3236/2018 of 17 May of the current year, I hereby inform you that the shark implementation check sheet, required in accordance with Rec. 16-13 (document in Word format "16-13_SPA_CR: Shark implementation check sheet), was duly submitted by e-mail on 1 October 2018, also in response to ICCAT Circular #4300/2018, received on 21 June 2018.

The e-mails received as proof of submission of the documentation requested by Ms. Carmen Ochoa, of the Compliance Department, ICCAT Secretariat, have been attached.

The "Shark implementation check sheet" explains the progress and plans developed by Costa Rica to address all the issues raised in correspondence No. 3236/2018.

It should be noted that Costa Rica submitted the pending required information referred to in correspondence No. 3236/2018 and ICCAT Circular #4300/2018, which stated that the submission deadline for this information was 1 October of the current year. The information was positively received by the Compliance Department of the ICCAT Secretariat.

Yours sincerely,

(signed and sealed)

Moisés Mug Villanueva
Executive Chair
INCOPESCA

INCOPESCA

San José, 16 October 2019
PESJ-389-2019

Mr. Derek Campbell
Compliance Committee Chair

Dear Sir,

According to your letter, the following deficiencies were noted for Costa Rica:

- Rec. 11-15 confirmation of zero catch received late
- Rec. 16-13: legally binding measures have not been taken to implement the shark requirements
- Rec. 12-07: no list of designated ports
- Overharvest of white marlin and swordfish

In response to the request for information, I have attached the form in the suggested format as well as a series of annexes.

Please accept the assurances of my highest consideration.

(signed and sealed)

Daniel Carrasco Sánchez
Executive Chair
INCOPESCA

COMPLIANCE LETTER RESPONSE TEMPLATE - COSTA RICA

2018 Commission Meeting			
CPC: COSTA RICA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATA MISSING/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year: late response	Late response to note #3236-2018 (17/05/18), but the shark implementation check sheet (in accordance with Rec. 16-13) was submitted on time on 1 October 2018 (the emails of acknowledgement of receipt from ICCAT have been attached).	The support team of the executive secretariat was consulted to seek clarification. There are insufficient staff to respond to ICCAT data requests. It has been requested that a solution be found for this situation.	The shark implementation check sheet (in accordance with Rec. 16-13) was submitted on 01/10/2018 and a reply to the COC Chair's letter was submitted on 24/10/2018 through an official communication from the INCOPESCA Executive Presidency PESJ-292-2018 (see attachments).
Annual report		The support team of the executive secretariat was consulted to seek clarification.	The 2017 annual report had to be corrected, but it was submitted by the stipulated deadline and the correction requested by ICCAT was submitted in October 2018.
Statistical data reporting	Confirmation of zero catch received late.	The country started to report catches last year.	
MCS Measures	Rec. 16-13: no legally binding measures to implement shark requirements.	Costa Rica has had regulations in place since 2003 governing shark landings. Last year's report indicated the applicable regulations.	The shark implementation check sheet (in accordance with Rec. 16-13) was submitted on 01/10/2018.
	Rec. 12-07: no list of designated ports.	Costa Rica has not authorised ports for foreign vessels off the coast of the Convention area.	
Catch limits / quotas	Overharvest of white marlin.	For 2018, total landings of the longline fleet are as follows: White marlin: 35 t Measures have not been implemented to date to ensure that landings do not	

		exceed the ICCAT limit, since the reference used was taken from the table of paragraph 1 Mexico, whose limit is 70 t, however the catch of white marlin decreased for 2018 compared to that reported in 2017 (a total of 69 t was reported).	
	Overharvest of swordfish	Bycatch by year of the longline fleet directed at swordfish is as follows: 2014: 25 t 2015: 27 t 2016: 21 t 2017: 32 t 2018: 40 t	This information was submitted last year and this one on the corresponding forms(Costa Rica_CP13-COC_Sec-ES) and last year, the corresponding correction was sent as the form had been submitted with the data in kilos and not in tons. The requested correction was made and the data were submitted in tons.
Other issues			