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INTERNATIONAL COMMISSION FOR THE CONSERVATION OF ATLANTIC TUNAS
COMMISSION INTERNATIONALE POUR LA CONSERVATION DES THONIDES DE L'ATLANTIQUE
ICCAT CICTA CICAA
COMISIÓN INTERNACIONAL PARA LA CONSERVACIÓN DEL ATÚN ATLÁNTICO

Madrid, 21 September 2020

Mrs. Leslie Joyce
Chief Fisheries Officer
Ministry of Maritime Affairs, and the Blue Economy
Fisheries Division Barbados
Princess Alice Highway BB11144 Bridgetown, St. Michael
BARBADOS

SUBJECT: LETTER ON COMPLIANCE ISSUES

Dear Mrs. Joyce,

On behalf of the International Commission for the Conservation of Atlantic Tunas (ICCAT), I am writing to inform you that, at the 26th Regular meeting of ICCAT (18-26 November 2019, Palma de Mallorca, Spain), the Commission noted that some reporting deficiencies remain unresolved. The reporting and implementation deficiencies are listed in the attached response template.

During the 2019 Compliance Committee meeting, Contracting Parties, Entities and Fishing Entities (CPCs) were assessed for compliance with ICCAT conservation and management measures and reporting requirements. Based on the review of the Secretariat Report on Statistics and Coordination of Research and the 2019 Secretariat's Report to the Compliance Committee and other available information, the Committee noted the following deficiencies for Barbados:

- Rec. 16-14: No national scientific observer programme yet in place, no data received (see Ref. 12-13 and via form ST09-DomObPrg.xlsx);
- Rec. 18-09: "N/A" is not a sufficient response in annual report for this measure's requirements; no list of designated ports submitted, and it is not clear from Barbados's annual report if foreign vessel access to Barbados' ports is prohibited generally, or if no vessels sought to enter Barbados (via form CP24-AuthPorts_TRI.xlsx);
- Rec. 10-09/13-11: Full implementation of sea turtle mitigation measures unclear (via form ST09-DomObPrg.xlsx);
- Overharvest of blue marling and white marlin (via ICCAT Compliance Reporting Table).

With respect to Rec. 16-14, while Barbados noted in 2018 that it lodged an objection to its predecessor Recommendation 10-10, this is a new measure, and Barbados did not object to it, hence it applies to Barbados. All CPCs must submit both info on the design of their scientific observer program in accordance with Rec. 16-14 requirements (via form and ST09 and relevant section of Annual Report; see Ref. 12-13), and data from these observers via form ST09-DomObPrg.xlsx. In its October 2019 response to my letter of September 2019, which also raised this issue, Barbados explained its challenges in implementing this measure due to vessel size. I draw Barbados's attention to allowance for this circumstance that is made in Rec. 16-14, provided that the CPCs alternative arrangements are notified to the SCRS and approved by the Commission.

With respect to Rec. 18-9, "N/A" or "not applicable" is not a sufficient response to the Annual Report field concerning the requirement to notify ports designated for landing or transhipment of ICCAT species by foreign flagged vessels. An acceptable response would be either informing ICCAT of which ports in which it may be possible for foreign flagged vessels to land or transship ICCAT species, or confirmation that the CPC has a general prohibition on such activity by foreign flagged vessels. Barbados's response that "No foreign fishing vessels were allowed entry into the Barbados port nor were any such entries planned" is unclear on these points.

With respect to Rec. 10-09/13-11 on sea turtles, note that these contain requirements on CPCs to implement specific bycatch mitigation measures in a legally binding manner. Barbados's annual report refers to requirements on its fishers to report interactions with sea turtles, and that a "plan is being developed to instruct fishers on the best practices for safely extricating these animals from longline gear to reduce injuring and increasing the animal's survival without endangering the fishers." Based on Barbados' responses in its Annual Report, it is unclear whether Barbados implements the bycatch mitigation requirements of these Recommendations in a legally binding manner.

With respect to marlin overharvest, which is a recurring issue for Barbados, I recall that Barbados indicated in its Oct. 2019 letter that certain management steps were being considered to address this matter, so I request any updates on that or other efforts to bring Barbados' landings into compliance with the limits under this measure.

Lack of full implementation of ICCAT requirements can undermine the work of the Commission in fulfilling the Convention's objectives, and late or incomplete reporting causes difficulties for the Secretariat in preparing documents for the Commission and its Panels and Committees and reduces the effectiveness of the Compliance Committee. The lists of reporting requirements, the relevant reporting forms, and ICCAT Recommendations and Resolutions are published annually on the ICCAT web site at:

https://www.iccat.int/en/SubmitCOMP.html
https://www.iccat.int/en/submitSTAT.html
https://www.iccat.int/en/RecRes.asp

The Commission requests Barbados to reply to this letter before **20 October 2020** and complete the attached template (preferably submitted as an MS Word document) to indicate the actions taken by Barbados to rectify the deficiencies indicated. The response should include details of the management measures Barbados has put in place to rectify the overharvests of blue marlin and white marlin.

If you have any questions about the issues raised in this letter, including a request for a more detailed explanation of the issues, please do not hesitate to contact me through the Secretariat at info@iccat.int.

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

Derek Campbell
Compliance Committee Chair

cc: M. Delgado, *Commission Chair*