

Original: English/French/Spanish

RESPONSES FROM CPCs TO LETTERS FROM THE CHAIR OF THE COMPLIANCE COMMITTEE

This Document contains response to the letters from the Chair of the Compliance Committee received by **1 October 2021**. Replies received after the deadline will be presented as **Addendum** to COC-309. **Annex 1** of document COC-309 contains the letters sent by the COC Chair.

RI= Reporting issues; II = implementation issues; OH = overharvest; None = no letter sent

<i>CPC</i>	<i>Letter type</i>	<i>Reply received</i>	<i>Template completed</i>	<i>Missing information sent</i>
Albania	none			
Algeria	none			
Angola	RI/II			
Barbados	II/OH	01 October 2021	Yes	Partial (see template for explanation)
Belize	none			
Brazil	RI			
Cabo Verde	RI/II	Acknowledged 5 August 2021		
Canada	none			
China PR	II/RI	29 September 2021	29 September 2021	No (see template for explanation)
Côte d'Ivoire	II/RI	30 September 2021	30 September 2021	Yes
Curaçao	none			
Egypt	none			
El Salvador	RI/II	24 September 2021	24 September 2021	Yes
Equatorial Guinea	none			
European Union	RI	1 October 2021	1 October 2021	Yes
France SPM	RI	1 October 2021	1 October 2021	N/A
Gabon	RI	30 September 2021	30 September 2021	
Gambia	RI	12 September 2021	30 September 2021	Yes
Ghana	RI	Only template	24 September 2021	No (see template for explanation)
Grenada	ID letter - recurring significant reporting issues	Acknowledged 05 August 2021		
Guatemala	RI/II	01 October 2021	01 October 2021	Yes
Guinea Bissau	ID letter - recurring significant			

<i>CPC</i>	<i>Letter type</i>	<i>Reply received</i>	<i>Template completed</i>	<i>Missing information sent</i>
	reporting issues			
Guinea Rep.	<b>ID</b> letter - recurring significant reporting issues	30 September 2021	30 September 2021	Partial
<b>Honduras</b>	RI			
Iceland	None			
Japan	None			
Korea	None			
<b>Liberia</b>	RI/II/OH			
Libya	RI/II	13 September 2021	13 September 2021	Yes
<b>Mauritania</b>	RI/II			
Mexico	None			
Morocco	None			
Namibia	<b>ID</b> letter - recurring significant reporting issues + recurrent overharvest	30 September 2021	30 September 2021	Yes
<b>Nicaragua</b>	RI			
<b>Nigeria</b>	RI			
Norway	None			
<b>Panama</b>	RI			
<b>Philippines</b>	RI	Acknowledged 07 August 2021		
Russia	RI	26 August 2021	26 August 2021	Yes
<b>São Tomé e Príncipe</b>	RI			
<b>Senegal</b>	RI/II			
<b>Sierra Leone</b>	RI/II			
<b>South Africa</b>	RI			
St Vincent & Grenadines	RI/II	Acknowledged 09/08/2021		
Syria	RI	24 September 2021	24 September 2021	Yes
Trinidad & Tobago	RI	29 September 2021	29 September 2021	n/a
Tunisia	RI	30 September 2021	30 September 2021	Yes

<i>CPC</i>	<i>Letter type</i>	<i>Reply received</i>	<i>Template completed</i>	<i>Missing information sent</i>
Turkey	None			
Uruguay	None			
UK	None			
USA	None			
Venezuela	RI			
Bolivia	RI			
Chinese Taipei	None			
Costa Rica	ID letter - recurring significant reporting issues + recurrent overharvest	28 September 2021	28 September 2021	Yes, except compliance table
Guyana	ID letter- recurring significant reporting issues and recurrent overharvest	Only template	01 October 2021	
Suriname	None			

Ministry of Maritime Affairs and the Blue Economy  
Fisheries Division  
Princess Alice Highway,  
Bridgetown, Barbados  
BB11144

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

Dear Mr. Campbell

I refer to your letter of 5 August 2021 in which a number of compliance issues were raised.

Succinct responses to the specific Compliance issues identified in your letter have been inserted in the table in Appendix 1.

In addition, corrections to address the discrepancies between Task I catch data and the corresponding catches in the respective Compliance Reports, have been inserted in the excel file submitted by ICCAT and is also attached.

I observe that in your letter of August 5th you have noted the response sent to the Commission to the Compliance Committee Chair's letter of 2019 and acknowledge the steps taken but understandably remain concerned about the recurring compliance and implementation issues; specifically noting the lack of an observer program and overharvests of blue and white marlins. In this context, I am pleased to report that Barbados has made significant strides during the last year in setting a firm legislative framework through the development of the comprehensive Draft 2021 Fisheries (Management) Regulations which would allow the implementation of ICCAT recommendations and strategies for their implementation by force of law. These Regulations have undergone the processes of stakeholder consultations, review and amendment and are now awaiting Cabinet approval. It is envisaged that they will in place by the first quarter of 2022.

In the context of the establishment of observer programs, regulations are included that mandate that masters of both commercial and recreational vessels accommodate observers (both for scientific and MSC purposes) or allow for the use of such surveillance equipment necessary for electronic monitoring of fishing activities. This is especially important as the majority of fishing vessels are too small (less than 15m overall length) to safely support non-crew on-board and as such electronic monitoring will most likely serve as alternative scientific monitoring as allowed under Rec16-14 4b. It should however, be noted that details of the observer programme have not yet been finalized and critical issues including technical and financing arrangements, such as cost sharing between government and the industry are still to be resolved.

The planned multi-pronged approach to reducing catches of blue and white marlins is detailed in the attached table and need not be repeated here. Nevertheless, it should be noted that regulations are included in the Draft 2021 Fisheries (Management) Regulations that will facilitate the full implementation of this plan. However, in the context of reducing overharvests of these sensitive species, it is incumbent on me to reiterate the following key points in relation to Barbados' ability to bring its catches to within, respectively, the catch limit set for blue marlin and the quota set for white marlin, especially in the context of redressing the existing levels of overharvest for the two species that has increased incrementally over the years.

Barbados is located within a geographical area of relatively high abundances of all billfish including marlin species. The methods and gears used in the Barbados longline fishery are relatively non-selective and as such all species of fish susceptible to the gear and within the fishing range including marlins are equally exposed to the risk of capture. It is against this background that the multipronged approach detailed in the attached table as well as in this year's National Report was devised. However, it must be stressed here that even though this plan should result in reduced catches of these species some will still be landed and as such the reduction in catches and by extension reduction of the overages will be incremental over time starting in earnest from when the regulations can be put in force.

Furthermore, it must be reiterated that marlins are consumed in Barbados, and as such are important in both economic terms for the fishing industry and in the context of national food security. Please note that the entire catch of marlins is consumed locally and none is exported. For the last few years it has been repeatedly reported that there has been a highly significant overall reduction in the island's fisheries production in particular the island's keystone flying fish and dolphinfish fisheries resulting from the annual Sargassum incursions. While there was no significant increase in fishing effort for marlins or indeed any other ICCAT species, access to the Barbados marlin catches was of particular importance to Barbados' food security.

This important aspect of the fishery was brought to the forefront especially in early 2020 during the Covid-19 pandemic when Government made the decision to keep the fishing industry open during island-wide lockdowns in 2020 (March-May) and subsequent curfews and other restrictions on movement around the island designed to curb the spread of the disease. During the most restrictive periods of the lockdowns, consumers' access to purchase fish ranged from severely limited to non-existent resulting in obvious significant losses in revenue for the fisherfolk. However, it is a source of national pride that despite the losses in income, not only did Barbadian fisherfolk continue to fish but even donated large portions of their catches to feed the less fortunate in the island. It should be noted also that against the backdrop of the already mentioned dearth of the mainstay catches of flying fish and dolphinfish, it was the catches of the longline fleets, including marlins, that were donated and literally fed hundreds of Barbadians who by dint of the pandemic had joined the ranks of the needy, through at worst losing their jobs or being forced to remain in their homes during the lock downs and periods of limited travel.

I trust that the severity of this issue of non-compliance on the part of Barbados in relation to marlin overharvests is adjudged in the context of the quantities concerned, which contribute to national food security, compared to the quantities of the same species discarded by some fishing entities.

In response to the USA concerns with respect to the issue of shark management, I reiterate that there is no targeted fishery for sharks in Barbados and as stated in this year's shark check list, the draft 2021 Fisheries (Management) Regulations includes regulations that control the fate of incidental catches of any species under controlled management including sharks. The regulations will be used to effectuate ICCAT recommendations in relation to each shark species, ranging from outright prohibitions on capture and retention to permissible limited capture and retention, in addition to mandating reporting of the fate of sharks interacting with fishing gear.

Please accept the assurances of my highest consideration.

Sincerely



Joyce Leslie (Mrs.)  
CHIEF FISHERIES OFFICER (Ag)

Compliance Matters Identified in 2020 Correspondence Process			
CPC: BARBADOS			
CATEGORY	COMPLIANCE MATTER	REMEDIAL ACTIONS TAKEN OR PLANNED	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year:			
Annual Report	Rec. 16-14: No observer programme yet in place so no data / information submitted (see Ref. 12-13).	As will be appreciated a <i>bona fide</i> observer program cannot be based on voluntary participation but must ensure mandatory participation through force of law. This first step has been taken through the Draft 2021 Fisheries (Management) Regulations which includes regulations that specifically mandate that the masters of all commercial and recreational fishing vessels participate in observer programs including the allowing the installation of the equipment necessary for electronic monitoring programs. This last clause is particularly important given that the majority of the fishing vessels in the Barbados fleet are	

		<p>less than 15m LOA and cannot safely carry non- crew observers and as such provision 16-14 4b applies providing for an alternative scientific monitoring that will be an electronic monitoring program. The details of this program have not yet been finalized but will be duly submitted for review by ICCAT before implementation. Note that the Draft Regulations have undergone the processes of stakeholder consultations, review and amendment and is now awaiting Cabinet approval. It is therefore hoped that they will be in effect no later than the first quarter of 2022.</p>	
<p>Statistical data reporting</p>	<p>Rec. 16-14: No domestic scientific observer program in place and no observer data submitted (via form ST09-DomObPrg.xlsx).</p>	<p>As there is no observer programme in place there is no relevant data to submit.</p>	
<p>Catch limits/quotas</p>	<p>Continued overharvest of BUM.  Overharvest of WHM in 2019.</p>	<p>A multipronged approach will be taken to reduce catches of marlins. This will include (1) Mandatory release of all blue and white marlins</p>	

		<p>that are alive at haul-back.</p> <p>(2) Replacement of "J" type hooks with circle hooks in the longline fishery. To this end sponsored sea trials will be conducted to test the gear and foster buy-in by the industry and followed by the banning of "J" hooks. This should reduce the mortality rate of all animals hooked on the line and increasing the number alive at haul-back. An important advantage of this is not only increasing the number of live marlins released as mandated and thus commensurately fewer being landed, but improved quality and the attainment of higher market grades for target tuna which will serve as an incentive for utilizing this gear.</p> <p>(3) Sea trials will also be conducted for fishing at deeper depths with longer drop lines in an attempt to reduce marlin encounters while potentially increasing swordfish and</p>	
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	<p><u>Some differences between Task 1 and Compliance tables for historical data.</u></p>	<p>target tuna catches along with improved product quality.            (4)            Encouragement of increased targeting (i.e. nighttime sets etc.) of swordfish for which Barbados has unused quota thus offering this species as an alternative to marlins and also further reducing the chances of catching marlins.            (5) A number of regulations within the draft 2021 Fisheries (Management) Regulations will be used to facilitate the implementation of these planned actions.</p> <p>The attached excel file includes the necessary corrections to address the differences between Task 1 and Compliance tables for historical data for Barbados. The corrections are highlighted in yellow.</p>	
Other issues			

**BUREAU OF FISHERIES, MINISTRY OF AGRICULTURE AND RURAL AFFAIRS,  
PEOPLE'S REPUBLIC OF CHINA**

地址: 北京农展馆南里11号, 邮政编码: 100125  
Address: No.11 Nongzhanguan Nanli, Beijing, 100125  
电话 (TEL) : 86-10-59192966 传真 (FAX) : 86-10-59193056

To Mr. Derek Campbell  
Compliance Committee Chair  
International Commission for the Conservation of Atlantic Tunas

**Subject:** Reply letter of China regarding to compliance issues in 2020

Dear Mr. Chair,

Thank you for your letter about compliance issues on August 5, 2021. Above all, I would like to express our sincere gratitude for your efforts and hardworking on promoting compliance issues within ICCAT.

Regarding to Conservation and Management measures, we apologize for the late reporting and submission of the document because the coordination within our group was disturbed by the outbreak of the COVID-19. We had improved the coordination method in our group so as to avoid late reporting.

Regarding to the MSC Measures about no list of designated ports (Rec 18-09), I would like to address the following actions that China had taken to rectify the deficiency.

First, the Ministry of Agriculture and Rural Affairs of China conducted the research and feasibility study of joining the FAO port state measures. However, port designation and inspection in China involves many departments from different ministries. Currently, we are in the process of making efforts to coordinate these sectors in order to implement the port state measure in future.

Second, China had started to implement Customs Clearance Certificate for fishery product of bigeye tuna, bluefin tuna, swordfish and toothfish which entered into China' territory since 2010. Any importer must apply for Customs Clearance Certificate with transshipment declaration, statistics document, certificate of origin etc. In this way, China makes our efforts to conduct the conservation and management measures as well as to fight against IUU fishing.

Third, China had conduct several port inspections for some foreign vessels on a case-by case basis upon the request of other states or RFMO during the past years. China would like to continue this practice until we join in the PSM of FAO.

China wish to reaffirm ourselves to strictly comply with the ICCAT Convention and its conservation and management recommendation.

I hope the above clarification could explain the situation.

Best regards,

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

Comments received on COC recommended action (COC\_328\_APP\_1/ 2020)

From: United States

China: We thank China for clarifying its North Atlantic shortfin mako data. We look forward to seeing an updated data submission and respectfully encourage China to submit discard data given that its fleet does not retain North Atlantic shortfin mako, as stated in their Shark Implementation Check Sheet. Timely submission of these data are essential to support enhanced shark science and management.

Compliance Letter Response Template - China

Compliance Matters Identified in 2020 Compliance Process			
CPC: CHINA			
CATEGORY	COMPLIANCE MATTER	REMEDIAL ACTIONS TAKEN OR PLANNED	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year	No response received	China had improved the coordination method in our group so as to avoid late\no reporting	
Annual Report			
Statistical data reporting			
MCS Measures	18-09: No list of designated ports received	1\ the Ministry of Agriculture and Rural Affairs of China conducted the research and feasibility study of joining the FAO port state measures. 2\ China had started to implement Customs Clearance Certificate for fishery product of bigeye tuna, bluefin tuna, swordfish and toothfish which entered into China' territory since 2010. 3\ China had conduct several port inspections for some foreign vessels on a case-by case basis upon the request of other states or RFMO	

Conservation and Management measures	19-04: regulations and other related documents for implementation of eastern Bluefin tuna requirements submitted late	China had improved the coordination method in our group so as to avoid late reporting	
	18-06. Late submission of updated shark check sheet	China had improved the coordination method in our group so as to avoid late reporting	
Catch limits/quotas			
Other issues			

To  
Mr. Derek Campbell  
ICCAT Compliance Committee Chair  
Corazón de María, 8  
MADRID – Spain

**Subject: Response of Côte d'Ivoire to ICCAT letter of concern**

Dear COC Chair,

I am writing to you to respond to the letter of concern addressed to our country, dated 5 August 2021. On behalf of the Government of Côte d'Ivoire, I duly note the compliance deficiencies observed for Côte d'Ivoire in relation to some ICCAT requirements.

We work daily to improve our performance, despite our heavy workload

Please accept our sincere expression of collaboration.

Yours sincerely,

**Fofana Bina**  
**Water and Forests Engineer**

**Attachments (02)**

- Duly completed response template
- 2020 Annual Report

**CC: Mr. R. Delgado, Commission Chairman**  
**Camille Jean Pierre Manel, ICCAT Executive Secretary**

<b>Compliance matters identified in the 2020 correspondence process</b>			
<b>CPC: COTE D'IVOIRE</b>			
<b>CATEGORY</b>	<b>COMPLIANCE MATTER</b>	<b>REMEDIAL ACTIONS</b>	<b>DATE MISSING DATA/INFORMATION SENT (if applicable)</b>
Response to COC Chair's letter following the 2019 meeting	No response received (nor was a response received to the letter following the 2018 meeting)	Internal organization to better monitor requirements	30 September 2021
Annual Report	No annual report received	We have written the report but have neglected to submit it  We have reorganised internally to better monitor requirements	30 September 2021
Reporting of statistical data	Rec. 16-14: Information on national observers programmes not submitted (through ST09-DomObPrg.xlsx)	Review the national observer programme to increase efficiency.	ST09- DomObPrg.xlsx will be submitted shortly
MCS measures	Rec. 16-13/18-06: No update to shark check sheet received.	Internal reorganization carried out to better monitor requirements	30 September 2021
	Rec. 18-05/19-05: No billfish check sheet received.	Internal reorganization carried out to better monitor requirements	30 September 2021
Catch limits/quotas	Rec. 11-11 /16-16: Some differences were observed between Task 1 and compliance tables	Perform a more rigorous comparison of the data to be submitted	

**CENTRE FOR FISHERIES AND AQUACULTURE DEVELOPMENT  
(CENDEPESCA)**

Santa Tecla, 22 September 2021

Derek Campbell  
Compliance Committee Chair  
International Commission for the Conservation of Atlantic Tunas  
Madrid, Spain

**Subject: Response to the letter on compliance related issues**

Dear Mr Campbell,

In reference to ICCAT official communication salida 2021-08-05 S21-05905, on reporting and implementation deficiencies by El Salvador, I have the honour to attach herewith, the completed proposed response template, which summarises the information previously reported on this subject in correspondence during 2020.

We would like to reiterate that El Salvador is fully convinced and committed to compliance with the provisions of the ICCAT Convention, its recommendations and resolutions. Therefore it is our responsibility to ensure compliance with the provisions of the Commission; for this purpose we have the relevant technical, logistical and regulatory infrastructure to ensure this compliance.

Regards,

Signed: Francisco Saca

Sealed: MINISTRY OF AGRICULTURE AND LIVESTOCK – CENTRE FOR FISHERIES AND AQUACULTURE  
DEVELOPMENT -DIRECTORATE GENERAL

Director General

## Compliance letter response

Compliance matters identified in the 2020 correspondence process			
<b>CPC: EL SALVADOR</b>			
<b>CATEGORY</b>	<b>COMPLIANCE MATTER</b>	<b>REMEDIAL ACTIONS TAKEN OR PLANNED</b>	<b>DATE MISSING DATA/INFORMATION SENT (if applicable)</b>
Annual report	Annual report received late (7 October 2020)	<p>As per official communication 578 of 29 October 2020, sent to the Secretariat on 30 October 2020 in response to ICCAT Circular 7132/20, the delay of 21 days in submission of the report “occurred as a result of the special circumstances that have been experienced worldwide this year due to the COVID-19 pandemic, since the report had to be audited by the international fisheries subcommittee of my country, which had been designated as part of the remedial plan to ensure compliance with ICCAT.”</p> <p>Actions to ensure compliance have been taken and it is intended to continue improving all aspects of compliance.</p>	Not applicable
Conservation and management measures	Rec. 19-01: Fishing and FAD plans received late (30 April 2020), without advance notice	Fishing and FAD plans are regulated by 19-02, not 19-01. Following this clarification, it is informed that the procedure for submission of fishing and FAD plans was corrected in line with paragraphs 22 and 34, in accordance with the entry into force of Rec. 19-02. Therefore, it is not expected that delays will occur in the future.	
Catch limits / quotas	Rec. 16-01: Sufficient measures have not been taken to keep catches below 1,575 t	The fisheries authority issued in January 2020, a resolution which distributed its 1,553 t of bigeye tuna (Rec. 19-02) among its 4 vessels. A catch limit per vessel was thereby established and surpluses were transferable within the same year. The system was highly effective and bigeye tuna catches remained below this limit in 2020.	Not applicable



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND  
FISHERIES

International Ocean Governance and Sustainable Fisheries  
**Regional Fisheries Management Organisations**

Deputy Director  
and Head of Unit

Brussels,  
MARE.B.2/EAP (2021)

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 #5905/21)**

Dear Dr. Campbell,

Thank you for your letter of 5 August 2021. The European Union has carefully considered the issues raised during the 2020 decision making process regarding its performance. Please find attached our response to the letter of compliance issues (circular #5905/21) providing information on the specific remedial actions taken.

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

Yours faithfully,

Anders C. JESSEN  
Head of Delegation

Annex: Response to the letter of compliance issues

Cc.: Camille Jean-Pierre MANEL, Ester ALAEZ PONS, Agata MALCZEWSKA, Jérôme BROCHE,  
Francesca ARENA, Yves VAN POEKE

Commission européenne/Europese Commissie, 1049 Bruxelles/Brussel, BELGIQUE/BELGIË - Tel. +32  
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## Compliance Letter Response Template - EU

Compliance Matters Identified in 2020 Commission Process			
CPC: EUROPEAN UNION			
CATEGORY	COMPLIANCE MATTER	REMEDIAL ACTIONS TAKEN OR PLANNED	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year			
Annual Report			
Statistical data reporting	Some statistical data received late:	Statistical data of <b>EU-Netherlands</b> and <b>EU-Malta</b> (FC, NC and CE) was submitted to ICCAT <b>within the deadline</b> on 08.07.2020 and 02.07.2020 respectively.	NDL 08.07.2020
	<b>Fleet characteristics:</b> EU-Netherlands; <b>Nominal catch:</b> EU-Netherlands; <b>Catch &amp; Effort:</b> EU-Spain (some species) and EU-Malta	The EU-Malta data was the subject of review. Final data were sent on 06.08.2020 and 26.08.2020.  As every year, we have raised the awareness of Member States on the importance of timely submission of data. We have sent reminders, and the submission has improved compared to previous years. However, because many actors are involved, the statistical reporting for the EU remains a complex exercise.	MLT: Initial 02.07.2020 Final 26.08.2020  ESP (CE some species) 18.08.2020
MCS Measures	<b>Rec. 16-05:</b> Late submission of some SWO-MED vessels.	The first version of the EU-FRA list of their SWO-MED vessels, was returned for correction. The revised vessel list was received from France and submitted to ICCAT on 08.04.2020.  Every year provisional vessel lists are submitted by 15 January with a significant number of vessels for which it is not sure whether they will participate in the SWO-MED fishery. Multiple revised lists with additions/deletions to these provisional SWO-MED authorisations are submitted, until the final list of authorisations is established just before the start of the season on 1 April. This creates unnecessary administrative burden.	EU-FRA sent on 08.04.2020
	<b>Rec. 19-04:</b> Retroactive inclusion of	In 2020, the EU requested on two occasions the inclusion of BFT other vessels without complying	Documentation provided on <b>05.11.2020</b> (see

	vessels on BFT lists- one case of force majeure without explanatory documentation	with the 15 days minimum notice period provided in para 50 ii) of Rec. 19-04 due to legitimate operational reasons or force majeure (para 51): 1) EU-Spain: One BFT other vessel (towing vessel): request date: 31.08.2020; authorisation start date: 31.08.2020; documentation provided to ICCAT on 02.09.2020 2) EU-Spain: One BFT other vessel (towing vessel): request date: 28.09.2020; authorisation start date: 28.09.2020; documentation provided to ICCAT (after several reminders to ESP) on 05.11.2020.	ICCAT Circular # 7608/ 20 of 06.11.2020)
Catch limits/quotas	Some differences between Task 1 and compliance tables	Two major data sources, meeting different constraints and objectives, are used for the production of catch data regarding the EU fishing activity: - Data resulting from the application of the EU and/or international fisheries control rules and therefore fed mainly by professional fishermen's catch declarations and validated by the EU Member States authorities; - Estimations based on sampling data from the application of scientific protocols. The estimation of catches and discards is made based on data from the Information and Sampling Network of the Observer Programs.  The latter category being estimations, the EU considers that the data to be taken into account for the compliance table are data based on catch declarations and considered the official data.	
Other issues	COC seeks updated information on EU investigation concerning possible overharvest of Bluefin tuna discussed at the 2018 annual meeting (Tarantelo operation).	Information annex below	

## **Updated information on EU investigation concerning possible overharvest of Bluefin tuna discussed at the 2018 annual meeting (Tarantelo operation).**

The “Tarantelo operation” is a Criminal investigation carried-out by the Spanish Guardia Civil, in cooperation with Europol.

Following the Tarantelo Operation there have been two levels of intervention in relation to the follow-up of the investigation, at Member State level and at European Commission level.

At Member State (MS) level, Spain has opened a case at one of the highest Courts in Spain (Audiencia Nacional). As reported on previous occasions, this process is still under “secrecy summary” (secreto de sumario) requested by the judge and therefore the Spanish administration is not in a position to provide us with any details about this judicial case. The process is taking considerable time due to the complexity and magnitude of the judicial process and the presence of a large number of non-fishing related crimes. Because this is a complex criminal procedure, the Member States’ judicial authorities can only disclose information under strict conditions.

Should the judicial authorities disclose information before the ICCAT annual meeting, we will transmit it to the ICCAT secretariat.

At the European Commission level very intensive work has been done in close collaboration with our MS, to ensure that a robust and effective control system for the BFT fishery is in place and in order to continue improving the control and traceability measures and procedures applicable to BFT activities.

### **1. WORK ON CONTROL FOR BFT AT EU AND ICCAT LEVELS**

#### **1.1. EU LEVEL**

The European Commission carried out (end 2018 and 2019) a series of **verification and audits** in all MS with active BFT farms and traps<sup>1</sup>. The verifications found shortcomings in some Member States and as a result, the EU Commission launched an infringement procedure and formally asked another of our Member States to launch an administrative inquiry.

We also intensified the work with MS and the European Fisheries Control Agency (EFCA) to reinforce the control measures in BFT farms, by establishing procedures within the existing framework for cooperation between Member States on control activities through the Mediterranean and Eastern Atlantic **Joint Deployment Plan** (JDP)<sup>2</sup> and in particular its Annex V, which includes procedures which go beyond the current ICCAT requirements.

A substantial control effort was carried out by different Member States and under the coordination and supervision of EFCA, involving a number of **fishery patrol vessels and aircrafts**, including EFCA’s own chartered offshore fisheries patrol vessel and aerial surveillance capacity.

#### **1.2. ICCAT level**

The EU proposed and chaired the ICCAT **Working Group** (WG) on BFT control and traceability measures, established pursuant ICCAT Resolution 19-15. This WG met on 2-4 March 2020 to discuss possible improvements in the current system for the control of the live BFT fishery. The WG identified various provisions of Rec. 19-04 and other relevant ICCAT recommendations that would benefit from being clarified, combined, streamlined, or otherwise improved and reinforced. The conclusions submitted by the

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<sup>1</sup> Malta, Spain, Croatia and Portugal.

<sup>2</sup> Decision No 2019/16 of the Executive Director of the European Fisheries Control Agency, amending Decision No 2018/030 of the Executive Director of the European Fisheries Control Agency establishing a Joint Deployment Plan in the Eastern Atlantic and Mediterranean to coordinate the implementation of Commission Implementing Decision 2018/1986 of 13 December 2018 establishing specific control and inspection programmes for certain fisheries and repealing Implementing Decisions 2012/807/EU, 2013/328/EU, 2013/305/EU and 2014/156/EU.

WG were endorsed subsequently by the ICCAT Panel 2 intersessional meeting in March 2020<sup>3</sup>. The measures proposed by the EU to improve the BFT control system include:

### **1. Revision of control related measures contained in ICCAT Rec. 19-04,**

The current Recommendation 19-04 has some important shortcomings that make it difficult to implement an effective control system. The ambitious revision (the Recommendation has doubled in size), which is still underway and is progressing at a good pace, clarifies many of the existing control provisions, imports relevant provisions included in other existing ICCAT Recommendations<sup>4</sup> and proposes new provisions to strengthen the control of BFT, all this in order to facilitate the overall understanding and effective implementation of the rules governing the BFT fishery.

### **2. Proposed ICCAT resolution for the implementation of Remote Electronic Monitoring (REM) on board BFT processing vessels.**

Processing vessels are a critical point in the chain from a control point of view, since a large majority of the BFT that are caught passes through them and because BFT harvesting from farms and traps are operations that are difficult to control.

The EU tabled a working paper at the June 2021 IMM meeting that proposes a pilot project to evaluate potential measures to improve the control of processing vessels<sup>5</sup> operating in the BFT fishery in the Eastern Atlantic and Mediterranean Sea, by introducing the use of Remote Electronic Monitoring (REM), including Closed Circuit Television (CCTV), on board of those vessels.

### **3. Resolution by ICCAT 19-17 establishing a pilot program for the voluntary exchange of inspection personnel**

The EU also promoted a pilot program to allow the voluntary exchange of inspectors in controls carried out on BFT traps and farms. The pilot program will allow an improved exchange of best practices and inspection expertise for the control of farming activities, contribute the capacity of Contracting Parties and establish high control standards, ensuring at the same time the necessary level playing field.

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<sup>3</sup> The reports of the meetings of the Working Group and of Panel 2 are available on the ICCAT website <https://www.iccat.int/en/Meetings.html>

<sup>4</sup> ICCAT Recommendations 06-07 on tuna farming and 18-13 on an ICCAT BFT catch documentation program

<sup>5</sup> Processing vessels are those on board of which BFT are subject to one or more of the following operations, prior to their packaging: filleting or slicing, freezing and/or processing.

**Directorate of Territories, Food and Sea**

Ref: D2021/SAMP/ 079

Saint-Pierre, 15 September 2021

Service of Maritime and Port Affairs

Director of Territories, Food and Sea of Saint  
Pierre and Miquelon

Matter handled by: CHIAROVANO Serge  
Tel: 05 08 41 15 36  
serge.chiarovano@equipement-agriculture.gouv.fr

to

Compliance Committee Chair of the  
International Commission for the  
Conservation of Atlantic Tunas

Subject: Letter on compliance issues

Attached: Table

Chair,

Through the email of 5 August 2021 addressed to the Office of European and International Affairs of the Directorate of Maritime Fisheries and Aquaculture of the French Ministry of Agriculture and Food, you noted a reporting deficiency for France (Saint Pierre and Miquelon) due to late submission of the Annual Report.

As we indicated to you in the message of 27 October 2020, the delays observed are essentially due to internal reorganization of the Service of Maritime and Port Affairs of the Directorate of Territories, Food and Sea of Saint Pierre and Miquelon and to the fact that these matters are handled by a single person from the Service. The person's absence for different reasons (holiday leave, sick leave...) clearly undermine the conditions for full compliance with ICCAT requirements.

Furthermore, exceptionally prolonged delays in submission of the Annual Report are explained by a slowdown in activity during the period of the COVID-19 pandemic that we have been experiencing since the first semester of 2020 and to the periods of confinement imposed by the French Government.

Despite the significant change in staff within the Service of Maritime and Port Affairs of Saint Pierre and Miquelon in August 2021, we will submit the 2021 Annual Report within the established deadlines.

Please accept, Chair, the assurances of my highest consideration.

Director of Territories, Food and Sea

**Nicolas Allemand**

Copy: DPMA – SDRH / BAEI

## Compliance Letter Response Template

<b>Compliance matters identified in the 2020 correspondence process</b>			
<b>CPC: FRANCE SPM</b>			
<b>CATEGORY</b>	<b>COMPLIANCE ISSUE</b>	<b>REMEDIAL ACTIONS TAKEN OR PLANNED</b>	<b>DATE MISSING DATA/INFORMATION SENT (if applicable)</b>
Response to COC Chair letter from previous year	No response received.	Response is being drafted by France (SPM).	Response provided in 2020 through message of 27 October 2020.
Annual Report	Late submission of Annual Report (30 October 2020).	2021 Annual Report submitted before 15 septembre 2021 – Dates of submission by France (SPM) taken into account.	
Reporting of statistical data			
MCS measures			
Catch limits/quotas			
Other issues			

GABON

MINISTRY OF AGRICULTURE,  
LIVESTOCK, FISHERIES  
AND FOOD

Libreville, 30 September 2021

To

Mr. Derek Campbell  
Compliance Committee Chair

Madrid

**Subject:** Letter on compliance issues

**Ref.:** v/L N°S2 1-05905 of 5 August 2021

**Chair,**

I have the honour to acknowledge receipt of your correspondence referred to in the subject line, in which COC observed deficiencies for 2020 and I thank you for this.

Effectively, the Annual Report and the shark and billfish check sheets were submitted late because of administrative delays due to the consequences of the COVID-19 pandemic. Several competent services were closed, which is the case for this year. In addition, for observers, activities were suspended because of the pandemic, which is the why we did not submit the form.

As regards Task 2 data, we did not collect these over the course of the past year, and as regards Task 1 fleet characteristics data, we did not submit the form because we do not have any fleet targeting tuna. The catch data reported for 2020 concerned artisanal fisheries and small industrial fisheries.

We did not submit information for 2019 on our national onboard observer programme firstly because the 2019 form was a revised version and we did not understand how to complete it. In addition, we carried out observations mainly on foreign purse seiners with an access agreement, in the Gabonese EEZ. The information collected under the national observers programme was transmitted for this purpose to the companies that own these purse seiners, in accordance with the provisions of the access agreements. We considered that it was not useful to complete this form since the foreign-flagged vessels also submit this information to the Secretariat.

We are available to COC to provide further information.

We thank you for your customary collaboration,

Please accept, **Chair**, the assurance of my highest consideration.

**ICCAT focal point Gabon**

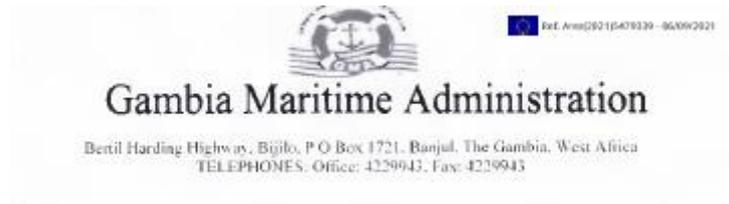
**Davy Angueko**

## Compliance Letter Response Template

<b>Compliance matters identified in the 2020 correspondence process</b>			
<b>CPC: GABON</b>			
<b>CATEGORY</b>	<b>COMPLIANCE MATTER</b>	<b>REMEDIAL ACTIONS TAKEN OR PLANNED</b>	<b>DATE MISSING DATA/INFORMATION SENT (if applicable)</b>
Response to COC Chair letter from previous year			23 September 2021
Annual Report	The Annual Report was submitted late (25 October 2020), some responses could be incomplete.		Explanations provided on 23 September 2021
Reporting of statistical data	Task 2 data and data fleet characteristics not received.		Data not collected in 2020.
	Rec. 16-14 : Information / data on observers programme not received (via form ST09-DomObPrg.xlsx).		Explanation provided on 30 September 2021.
Conservation and management measures	Rec. 18-06: Late submission of update to shark check sheet		Explanations provided on 23 September 2021.
	Rec. 18-05/19-05: Late submission of billfish check sheet.		
Catch limits / quotas			
Other matters	Lack of response to COC Chair letter following 2019.		Response provided on 23 September 2021

## Compliance Letter Response Template – The Gambia

Compliance Matters Identified in 2020 Correspondence Process			
CPC: THE GAMBIA			
CATEGORY	COMPLIANCE MATTER	REMEDIAL ACTION TAKEN OR PLANNED	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year		The lead delegate will engage his team and provide response to COC Chair letter from accordingly.	Before the ICCAT annual meeting 2021
Annual Report	No Annual Report received.	Someone has been assigned to work on annual report. The guidance may be required from the from the ICCAT secretariat.	
Statistical data reporting	No statistical data received (please see letter on prohibition of retention of ICCAT species sent 22 March 2021)	Data (ST02-TINC) has been Submitted to <a href="mailto:STATS_info@iccat.int">STATS_info@iccat.int</a> . and acknowledgement was received from <b>Juan Luis Gallego</b> <luis.gallego@iccat.int	Submission was done by September, 30, 2021 with registration number E21-09448
MCS Measures	No response to reporting requirements	Personnel have identified under research and MCS. Request for them to be guided by the secretariat on the procedure if necessary	
	Rec. 18-05/19-05: No billfish check sheet received.	The Billfish check sheet has been submitted by the Head of MCS Mr. Musa Jawla. There was acknowledgement of receipt on the 28/9/21	28/9/21 ICCAT Circulars n° 1449/21 and n° 1450/201
	Rec. 18-09: No list of designated ports submitted.	The designated port is Banjul Fishing Jetty. This information has been transmitted by MCS.	
Catch limits/quotas	Rec. 11-11 /16-16: No Compliance Reporting tables received.	There is no catch limit for individual EU vessels, however, according to the Sustainable Fisheries Partnership Agreement between the Gambia and the EU. EU vessels I allowed to fish 3300 tons of tuna Annually .	
Other issues	One vessel on IUU list	The vessel in question by the name ' <b>SAGE</b> ' has been <b>delisted</b> from the Gambian Register. After being notified about the vessel, The ministry of fisheries notified The Gambia Maritime Administration who are responsible for flagging of fishing vessels. Following this, action was taken to delist the vessel from the Gambian Register	



ANF 436/01(13)

2 August 2021

Head of Unit DG Mare - 84  
Rue Joseph II99 - 03/30 1049 Bruxelles  
Belgium

**RE: EU /GAMBIA-COOPERATION IN THE FIGHT AGAINST IUU FISHING - IUU VESSEL IN THE LATEST LIST OF VESSELS REGISTERED IN THE GAMBIA**

The Administration hereby acknowledges receipt of your email dated 22/07/2021 on the above subject matter.

Further to that please note below our reaction to some of areas of concern highlighted in your email:

- F/V Sage has been deleted from the Gambian register on receipt of same request from ICAAT Secretariat through our Fisheries Department in November 2020. Attached is a copy of the deletion certificate for your perusal and guidance.
- F/V Sea Urchin applied for a Provisional Certificate of Registry in August 2015 to allow her sail to Gambia for survey and permanent registration, the Provisional Certificate of Registry was valid for Three months. Upon issuance of the certificate Sea Urchin never show up at the shores of the Gambia and therefore her Provisional Certificate of Registry expired on the elapse of the three months. Her inclusion on the list of fishing vessels on the Gambian Register was an input error.

Trust you will find this in order and never hesitate to request for further clarification.

The image shows a handwritten signature in blue ink that reads 'Abas Saidykhan'. Below the signature is a circular official stamp. The stamp contains the text 'GAMBIA MARITIME ADMINISTRATION' around the perimeter and '03/08/21' in the center. Below the signature and stamp, the text 'For: Director General' is printed.

Cc: PS- MFWR, DG, DDG, HODS, File



The Republic of The Gambia



Gambia Maritime Administration



No.4 Clarkson Street Banjul, The Gambia West Africa,  
Telephone: Office: 4229943, Fax: 4229943, email: info@gambiamaritime.org

Merchant Shipping Act 2010.  
Made under PART III 21(1) )

DELETION CERTIFICATE

NAME OF VESSEL	OFFICIAL NUMBER	IMO NO.	GROSS TONNAGE	NET TONNAGE
YU CHENG	1020	7828815	354	239
NAME OF REGISTERED OWNERS		ADDRESS OF REGISTERED OWNERS		
YU CHENG OCEANIC CO. LTD		TAIWAN		
TIME OF DELETION		09th		

- I, the undersigned, hereby certify that-
- the vessel described above has been deleted from the register; and
  - at the time of deletion the following encumbrances were registered on the vessel

NEL

The Gambia

Date: 8TH FEBRUARY 2021

Signature and Stamp of

Issuing Authority

*U.S. Gambia*  
  
 02/02/21

## Compliance Letter Response Template - Ghana

<b>COMPLIANCE MATTERS IDENTIFIED IN 2020 CORRESPONDENCE PROCESS</b>			
<b>CPC: GHANA</b>			
<b>CATEGORY</b>	<b>COMPLIANCE MATTER</b>	<b>REMEDIAL ACTIONS TAKEN OR PLANNED</b>	<b>DATE MISSING DATA/INFORMATION SENT (if applicable)</b>
Response to COC Chair letter from previous year			
Annual Report			
Statistical data reporting	Some Task 2 data in incorrect format	Avdth database attached could not obtain required information from it.	
MCS Measures	Rec. 02-21/18-07: Data from BET Statistical Document programme received late	Covid 19 pandemic affected submission deadline.	
Catch limits/quotas	Some differences between Task 1 and compliance tables.	Updated compliance table with task 1 information	<b>SCRS/2021/133</b>  Estimation of Ghana tasks 1 and 2 purse seine and baitboat catch 2012 – 2020: data input 2021 bigeye tuna stock assessment
Other issues			

GOVERNMENT OF  
GUATEMALA

Ministry of  
Agriculture,  
Livestock and  
Food

Deputy Ministry of Agricultural Health and Regulations  
Directorate of Fisheries and Aquaculture Regulation

Bárcena, Villanueva 1 October 2021  
Official Communication No. DIPESCA-DIREC-6060-2021/JCLG/ya

Mr. Camille Jean Pierre Manel  
Executive Secretary  
International Commission for the Conservation of Atlantic Tunas (ICCAT)  
Corazón de María, 8  
28002 Madrid  
Spain

Dear Executive Secretary,

I extend cordial and warm greetings to you and wish you success in your daily activities.

I hereby address you with reference to ICCAT Salida 2021-08-05 S21-05905 in connection with the 2020 assessment of conservation and management measures, in which the Commission noted for Guatemala the following reporting and implementation deficiencies:

- Annual report received late (22 September 2020)
- Statistical data received late (11 August 2020)
- Rec. 16-14: Scientific observers data not received through form ST09-DomObPrg.xlsx, nor information on programme design
- Rec. 16-01: Quarterly bigeye reports not received
- Rec. 11-11/16-16: Some differences between Task 1 and compliance tables
- Rec. 18-05 and 18-06: Billfish nor shark check sheet submitted

In this respect, I would like to submit the information and thereby comply with what has been requested of the Republic of Guatemala by the Commission.

Thank you for your attention in this matter, please accept the assurances of my consideration and esteem.

Regards,

Signed: Julio César Lemus Godoy  
Director  
Directorate of Fisheries and Aquaculture Regulation

Sealed: Ministry of Agriculture, Livestock and Food  
Directorate of Fisheries and Aquaculture Regulation  
Directorate

Compliance Letter Response Template – Guatemala

<b>Compliance matters identified in the 2020 correspondence process</b>			
<b>CPC: GUATEMALA</b>			
<b>CATEGORY</b>	<b>COMPLIANCE MATTER</b>	<b>REMEDIAL ACTIONS TAKEN OR PLANNED</b>	<b>DATE MISSING DATA/INFORMATION SENT (if applicable)</b>
Annual Report	Annual report received late (22 September 2020).	Given the labour dynamics arisen due to the COVID-19 pandemic at world level and the reduction in fishing authority staff, there were difficulties in submitting the required documents on time.	Information submitted to the Commission on 22 September 2020.
Reporting of statistical data	Statistical data received late (11 August 2020).	Given the labour dynamics arisen due to the COVID-19 pandemic at world level and the reduction in fishing authority staff, there were difficulties in submitting the required documents on time.	Information submitted to the Commission on 11 August 2020.
	Rec. 16-14: Scientific observer data not received (through form ST09-DomObPrg.xlsx) nor information on the design of the observers programme	Form ST09-DomObPrg.xlsx is attached, which contains information for 2019, to be reported in 2020.  Under the current observers programme, there is 100% coverage 365 days a year on both vessels. For further information on the programme, we have attached the current contracts entered into with the company SEA EYE for both vessels.  Contracts for the service for both vessels have been attached.	
Conservation and management measures	Rec. 16-01: Quarterly bigeye reports not received. Recs. 18-05/18-06: Billfish nor shark check sheet received.	Documentation for three quarters of 2020 was submitted. For this purpose, the 2019 bigeye report for reporting in 2020 has been attached.	Information for three quarters was submitted on 21 December 2020.

		<p>The bill and shark check sheets were not submitted in 2020, since on this occasion Not applicable was indicated in the Guatemala Annual Report. The vessels flagged to Guatemala were purse seine vessels.</p>	
<p>Catch limits / quotas</p>	<p>Recs. 11-11 /16-16:  <a href="#">Some differences between Task 1 and compliance tables.</a></p>	<p>For this point, the relevant consultations with the industry were conducted, and the differences indicated were not found. Therefore, in relation to this request, further and more detailed information is requested.</p>	

REPUBLIC OF GUINEA  
Work – Justice – Solidarity

MINISTRY OF FISHERIES, AQUACULTURE AND MARITIME ECONOMY

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NATIONAL DIRECTORATE OF MARITIME FISHERIES  
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N°0266/MPAEM/DNPM/21

Conakry, 30 September 2021

*The National Director*

*to*

**Compliance Committee (COC) Chair  
ICCAT  
Madrid**

**Subject:** Response to the letter on maintenance of identification for the Republic of Guinea in accordance with the *Recommendation by ICCAT concerning trade measures* (Rec. 06-13)

Chair,

In response to your letter of 5 August 2021 on the subject referred to above, please find attached the completed template that you have requested.

Effectively, as informed through previous correspondence, our country has not operated tuna vessels under its flag for several years.

I would therefore ask that this identification be lifted since the domestic fishing engaged in by canoes of the artisanal fishery do not target in principle the species monitored by ICCAT.

Furthermore, administrative and scientific reforms have been undertaken to improve the overall governance of the sector, in particular, the consistency of national instruments with conventions and agreements to which Guinea is party.

However, due to the pandemic and its effects on mobilisation of human and financial resources, these reforms could not be completed.

Finally, we would like to reiterate our request for assistance from the Commission for poor developing countries, in particular the Republic of Guinea, for compliance with ICCAT requirements related to the artisanal fishery.

Please accept, Chair, the assurances of my genuine collaboration.

**Amara Camara KABA**  
Head Delegate of Guinea

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Compliance Letter Response Template

Compliance matters identified in the 2020 correspondence process			
CPC: GUINEA (REP.)			
CATEGORY	COMPLIANCE MATTER	REMEDIAL ACTIONS TAKEN OR PLANNED	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year	No response received.	Response to the COC Chair letter provided	19 October 2020
Annual Report	Annual Report not received.	There are no active tuna vessels flagged to Guinea. Consultations are ongoing within the different services with a view to building human capacity for monitoring ICCAT recommendations.	
Reporting of statistical data	No statistical data received.  No information received on the observers programme under Rec. 16-14.	For this purpose, a zero catch report was submitted.  The observers programme in place concerns coverage of small pelagics and demersal fishing vessels. Given our intention to participate in the tuna fisheries, this programme is soon to be extended to future vessels that may register.	13 August 2021
Conservation and management measures	<b>Rec. 18-05 and 18-06:</b> Billfish check sheet not received. Updated to shark check sheet not received.	There is no national industrial fleet of purse seiners, longliners or even a sports fishery. Therefore, the billfish check sheet could not be completed.  For the artisanal fishery (which does not target these species), a monitoring programme is in the process of being launched but it could not be implemented due to difficulties related to	

		<p>the pandemic. This programme provides for recruitment of agents to monitor the activities of the artisanal fishery.</p> <p>For sharks, under the management measures applicable to selacians (rays and sharks) it is prohibited in Guinea to catch, transport, tranship or land fins or carcasses separately.</p>	
Other matters	No response received in relation to other ICCAT reporting requirements	As a developing CPC, Guinea (Rep.) requests assistance from the Commission/Secretariat to build capacity in order to comply with requirements related to the artisanal fishery.	

Dear Mr, Campbell,

We acknowledge reception of your letter dated on 5th of august 2021, and i hope my response find you well and in good health.

CPC Libya had faced a lot of difficulties last year due to instability political situation in the country and haven't fulfilled to some ICCAT management measures and reporting requirements, and despite of all of that the former Head of delegate Mr. Zbida has succeed to submit non-compliance table last year on (6.12.2020).

In this regard in the current year 2021 we have managed to fulfil with all of our commitments related to the Tasks and reporting and I'm pretty sure that this delay for submitting the reports weren't intentionally, please be informed that this is an official response for your letter and attached is the complete table of non-compliance with the dates of submission for the year 2020, please don't hesitate to contact me for any inquires.

Regards  
Dr. Hasan Algafri  
HD of CPC Libya

## Compliance Letter Response Template - Libya

<b>Compliance Matters Identified in the 2020 Correspondence Process</b>			
<b>CPC: LIBYA</b>			
<b>CATEGORY</b>	<b>COMPLIANCE MATTER</b>	<b>REMEDIAL ACTIONS TAKEN OR PLANNED</b>	<b>DATE MISSING DATA/INFORMATION SENT (if applicable)</b>
Response to COC Chair letter from previous year	No reply received	Reply was sent on COC Letter	The date of reply was on 30/12/2020
Annual Report	Annual report received late (27/12/2020, after the 2020 correspondence process).	Annual report was submitted late due to unstable situation in the country and difficulties in internet and electricity shortage	Annual Report was sent on 27/12/2020
Statistical data reporting	Task 1 data received late	Task 1 was submitted late due to miss understanding for the submission date, Task 2 was not submitted due to difficulties in gathering data related  No national observer program was implemented in 2020	Sent on 13/09/2020
	No Task 2 data received.		
	Rec. 16-14: No information on national scientific observer program or data received.		
Conservation and Management Measures	Rec. 19-04 Regulations and other related documentation showing implementation not submitted	Refer To Doc PA2-10B-2020: The annual Farming, Fishing & Management Plan (Chapter 4 para. 2) adopted in March 2020 clearly indicates that ICCAT Rec were transported into Local legislation by way of Decree 33/2019	
Catch limits/quotas	No compliance tables received	Compliance Table was submitted on 30.09.2020	Sent on 06/12/2020
Other issues			

Dear Secretariat.

“Namibia took note of the letter from ICCAT identifying Namibia under ICCAT Rec 06-13 concerning trade measures dated 5<sup>th</sup> August 2021. Namibia studied the letter and addressed the deficiencies identified in the letter, as follows:

1. Rec. 16-14: No information on scientific observer programmes received.

Namibia completed the ICCAT observer form and is attached

2. Rec. 16:01 No quarterly report of bigeye tuna received.

Namibia completed ICCAT quarterly report of Bigeye tuna and was submitted to ICCAT on 15<sup>th</sup> September 2021, together with the national annual report.

3. Rec. 13-14: Termination of chartering agreements not communicated.

The deficiency of not communicating termination of chartered agreement was noted in 2019 and Namibia has improved. As of 2020, terminations will be fully communicated to ICCAT as per Recommendation: 13-14.

4. Rec. 18-04: Continued significant overharvest of blue marlin.

Namibia reviewed its catches recorded and noted that, prior to the period in question, catches for targeted species were low. Thus, Namibia increased its effort to improve catch performance which could have resulted in increased blue marlin catches. Further scrutiny of the catches lead to the conclusion that the increase in blue marlin catches reporting may also have resulted from misidentification. Namibia thus identified the need for further training in species identification of fishermen and observers. Namibia believe that such a training will help to address this deficiency and may approach ICCAT for assistance in this regard, as in the past.

5. Rec. 18-05 and 18-06 No updated shark and billfish check sheets received.

Namibia completed the shark and billfish check sheets, and is attached.

6. Some differences noted between Task 1 and Compliance tables

Namibia has took note of this and is reviewing these discrepancies noted to rectify.

7. Compliance response template

Namibia completed the template, as requested, and is attached.

Namibia highly values the work of ICCAT in ensuring responsible management of our living marine resource for the benefit of our people now and the future, particularly in waters beyond our national jurisdiction.

Namibia also assures ICCAT our continuous collaboration in these efforts.

Kind regards,  
Desmond Bester

Compliance Letter Response Template - Namibia

Compliance Matters Identified in the 2020 Correspondence Process			
CPC: NAMIBIA			
CATEGORY	COMPLIANCE MATTER	REMEDIAL ACTIONS TAKEN OR PLANNED	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year			
Annual Report			15 September 2021
Statistical data reporting	Rec. 16-14. No information on scientific observer programmes received.	Yes: National Observer Program exists. The Fisheries Observer Agency's (FOA) mandate is to observe the harvesting, processing and handling of marine resources and to collect biological data onboard commercial fishing vessels	30 September 2021 ref to ST 11
Conservation and Management Measures	Rec. 16:01: No quarterly report of bigeye tuna received.	Namibia completed ICCAT quarterly report of Bigeye tuna and was submitted to ICCAT on 15th September 2021, together with the national annual report.	15 September 2021
	Rec. 18-05 and 18-06: No updated shark / billfish check sheets received.		30 September 2021
	Rec. 13-14: Termination of chartering agreements not communicated	The deficiency of not communicating termination of chartered agreement was noted in 2019 and Namibia has improved. As of 2020, terminations will be dully communicated to ICCAT as per Recommendation: 13-14.	
Catch limits/quotas	Overharvest of BUM for 4 years in a row	Namibia reviewed its catches recorded and noted that, prior to the period in question, catches for targeted species were low. Thus, Namibia increased its effort to improve catch performance which	

		<p>could have resulted in increased blue marlin catches. Further scrutiny of the catches lead to the conclusion that the increase in blue marlin catches reporting may also have resulted from misidentification. Namibia thus identified the need for further training in species identification of fishermen and observers. Namibia believe that such a training will help to address this deficiency and may approach ICCAT for assistance in this regard, as in the past. It is therefore requested for ICCAT to consider increasing the BUM by catch limit to the average of what has been recorded over the years where it was over the limit allocated to Namibia.</p>	
Other issues	Some differences between Task 1 and compliance tables	Namibia has took note of this and is reviewing these discrepancies noted to rectify.	

Dear Mr. Campbell

The Russian Part thanks you for your sensitivity to the reporting materials of our country submitted as a result of the work in 2019, as well as remarks that were sent to me in the S21-05905 letter dated on August 05, 2021. We assure you that Russia as a Member of ICCAT since 1977, is fully committed to compliance with all ICCAT recommendations and resolutions for the conservation of Atlantic tuna stocks and fisheries regulation measures.

As regards your remarks:

- The Russian statistical data in the format of Task 1 and Task 2 for 2019 were submitted on 07.07.2020, i.e. 24 days before the deadline, and registered with the ICCAT Secretariat.

Later (23.07.2020) we received your remarks on some fields of the tables which were corrected and returned to the Secretariat 3 (three) days after the deadline.

The Task 1 and Task 2 statistical data were re-registered with the ICCAT Secretariat but with the date after deadline.

We were sure that the first registration date would remain and we were not aware of its change not in our favor after the adjustment.

- This also applies to the ST-09 form.
- We did send billfish and shark cheek sheets to the ICCAT Secretariat with a delay due to technical reasons. We have taken organizational steps to avoid delays in cheek sheets. We assure you once again of our aspiration in carrying out scientific work by observers on Russian trawlers even in the absence of specialized fishing for tunas.

In thanking you for your attention to these important matters,

Please accept the assurances of my highest consideration.

Oleg Bulatov  
Delegate from Russia  
Science Director, Russian Federal Research Institute of Fisheries and Oceanography

## Compliance Letter Response Template -Russia

<b>Compliance Matters Identified in the 2020 Correspondence Process</b>			
<b>CPC: RUSSIA</b>			
<b>CATEGORY</b>	<b>COMPLIANCE MATTER</b>	<b>REMEDIAL ACTIONS TAKEN OR PLANNED</b>	<b>DATE MISSING DATA/INFORMATION SENT (if applicable)</b>
Response to COC Chair letter from previous year			
Annual Report			
Statistical data reporting	Some statistical data received late -Task 1 zero catch data and Task 2 size data	The Russian statistical data in the format of Task 1 and Task 2 for 2019 were submitted on 07.07.2020, i.e. 24 days before the deadline, and registered with the ICCAT Secretariat. Later (23.07.2020) we received your remarks on some fields of the tables which were corrected and returned to the Secretariat 3 (three) days after the deadline. The Task 1 and Task 2 statistical data were re-registered with the ICCAT Secretariat but with the date after deadline. We were sure that the first registration date would remain and we were not aware of its change not in our favor after the adjustment.	07/07/2020 (03/08/2020)
Conservation and Management Measures	Rec. 18-05 and 18-06: Billfish check sheet received late; updated shark check sheet received late	Russia has taken measures to prevent delay of data. Timeframes for the harmonization of materials have been set for shipowners.	15/10/2020
Catch limits/quotas			
Other issues			

Dear Sir,

Referring to your letter dated 5 August 2021 on compliance issues, we would like to clarify the following:

We confirm that the national scientific observer programme should be implemented, but as result of circumstances in Syria and illegal sanction in addition to compulsory quarantine and suspension of all non-essential administration services activities in light of the COVID -19 pandemic in 2020 the national scientific observer programme not implemented, also the programme not implemented in 2021 as no fishing activities of BFT due to transferring of Syrian quota to Tunisia. We request you kindly for technical assistance in the implementation of Rec. 16-14 on scientific observers.

No billfish implementation check Sheet received due to technical default because no catch of billfish has been recorded in Syria previously and no commercial fishing operations targeting billfish by Syrian boats, the possibility of catching billfish is very limited, accordingly no by-catch of Billfish recorded in 2020 or 2021. We confirm that Billfish implementation check sheet should be sent to ICCAT, the billfish check sheet has been sent in 2021.

Vessel submitted for inclusion on ICCAT record less than 15 days before start date due to suspension of fishing activities and difficulties of conducting BFT fishing in 2020 as result of compulsory quarantine, travel restrictions and suspension of all non-essential administration services activities in Syria for undetermined period in light of the COVID -19 pandemic. Syria has lifted all restrictions adopted previously due to Coronavirus and restarted public life and reopened all aspects of the economy and society before the end of 2020 BFT fishing season, we informed ICCAT that Syrian vessel will conduct fishing activities in 8 /6/2020. The fishing activities started after 15 days in 23/6/2020.

Best regards.

تم الإرسال من البريد لـ

## Compliance Letter Response Template - Syria

Compliance Matters Identified in the 2020 Correspondence Process			
CPC: SYRIA			
CATEGORY	COMPLIANCE MATTER	REMEDIAL ACTIONS TAKEN OR PLANNED	DATE 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 (via form ST09-DomObPrg.xlsx) received or any alternative measures.	We confirm that the national scientific observer programme should be implemented, as result of circumstances in Syria and illegal sanction in addition to compulsory quarantine and suspension of all non-essential administration services activities in light of the COVID -19 pandemic in 2020 the national scientific observer programme not implemented and also the programme not implemented in 2021 as no fishing activities of BFT due to transferring of Syrian quota to Tunisia.	We request you kindly for technical assistance in the implementation of Rec. 16-14 on scientific observers
Conservation and Management Measures	Rec. 18-05/19-05: No billfish implementation check sheet received.	-Due to technical default because no catch of billfish has been recorded in Syria previously and no commercial fishing operations targeting billfish by Syrian boats, the possibility of catching billfish is very limited, accordingly no by-catch of Billfish has recorded in 2020 or 2021.	We confirm that Billfish implementation check sheet should be sent to ICCAT, the billfish check sheet has been sent in 2021.
	Rec. 19-04: Vessels submitted for inclusion on ICCAT Record less than 15 days before start date.	- Due to suspension of fishing activities and difficulties of conducting BFT fishing in 2020 as result of compulsory quarantine, travel restrictions and suspension of all non-essential administration services activities in Syria for undetermined period in light of the COVID -19 pandemic. Syria has lifted all restrictions adopted previously due to Coronavirus and restarted public life and reopened all aspects of the economy and society before the end of 2020 BFT fishing season.	we informed ICCAT that Syrian vessel will conduct fishing activities in 8 /6/2020. The fishing activities started after 15 days in 23/6/2020.
Catch limits/quotas			
Other issues			

**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*

29 September 2020

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

**SUBJECT: LETTER ON COMPLIANCE ISSUES**

Dear Mr Campbell

Trinidad and Tobago conveys its commendations to the Commission and Secretariat and wishes to reaffirm its commitment to conservation and management of Atlantic tunas and tuna-like species for the benefit of current and future generations.

Reference is made to your letter dated 5 August 2021 which seeks a reply from Trinidad and Tobago on the following compliance deficiencies noted by the Compliance Committee:

- Annual report received late
- Task II data received late
- Rec. 16-14: No national scientific observer programme data received, or any alternative measures presented for approval. Domestic observer program not yet implemented in Trinidad and Tobago
- Rec. 01-21/01-22 [18-07]: Bigeye and Swordfish Statistical Document bi-annual report received late
- Rec. 18-05 and 18-06: No billfish or updated shark Check Sheet received.

Please find attached the completed template indicating the remedial action taken and planned to address the identified deficiencies.

Trinidad and Tobago reiterate to the Compliance Committee, our commitment to improving our conservation and management regime and implementation of measures.

I wish, Chair, to extend to you, assurances of my highest consideration.

Yours sincerely

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Nerissa Lucky  
Director of Fisheries (Ag)  
TRINIDAD AND TOBAGO Head Delegate

## Compliance Letter Response Template – Trinidad &amp; Tobago

Compliance Matters Identified in the 2020 Correspondence Process			
CPC: TRINIDAD & TOBAGO			
CATEGORY	COMPLIANCE MATTER	REMEDIAL ACTIONS TAKEN OR PLANNED	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year			
Annual Report	Annual report received late	Trinidad and Tobago's pace of delivery of output was severely affected by the Covid-19 pandemic in conjunction with the already existing staffing limitations. Working conditions and procedures have been regularised to the extent possible and as a result, it is expected that reporting will be improved.	
Statistical data reporting	Task II data received late	All Task data were originally submitted on time, i.e. on 30 July 2020. However, the ST02 form required verification by TTO of the Secretariat's assumptions regarding their input of conversion factors for landing and dead discards and modification of species codes, and the ST03 form could not be processed mainly due to the provision by TTO of data for species that were no longer listed and the inclusion in error of some geogrid data for 20x20 grids-which are no longer allowed. With the assistance of the Secretariat, TTO successfully completed the forms and re-submitted the forms on 10 and 12 August 2020.	
	Rec. 16-14: No national scientific observer programme data (via form ST09-DomObPrg.xlsx) received or any alternative measures presented for approval.	Trinidad and Tobago, to date, is still without the legal and resource capacities to implement a scientific observer programme. We are, however, cognizant of the urgent need to implement a scientific observer programme for our longline fleet. In this regard the Fisheries Division will be seeking to implement a pilot observer programme, beginning in 2022, contingent upon the availability of human resources and funding. As stated in our Annual Report, The Fisheries Management Bill was laid in Parliament in August 2020 and subsequently in October 2020 and is currently being reviewed by a Parliamentary Joint Select Committee. It is expected that the Bill will be debated in Parliament in 2022. Draft Regulations	

		were developed to facilitate implementation of the registration and licensing system, and monitoring, control, surveillance, and enforcement.	
Conservation and Management Measures	Rec. 01-21/01-22 [18-07]: Bigeye and Swordfish Statistical Document bi-annual report received late.	This activity has been affected by limitations in staffing capacity. It is envisaged that the recent designation of new staff will result in an improvement in reporting.	
	Rec. 18-05/18-06: No billfish or shark Check Sheet received.	The Check Sheets will be re-submitted prior to the 2021 Commission Meeting.	
Catch limits/quotas			
Other issues			

## Compliance Letter Response Template

Compliance matters identified in the 2020 correspondence process			
CPC: TUNISIA			
CATEGORY	COMPLIANCE MATTER	REMEDIAL ACTION TAKEN OR PLANNED	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year			
Annual Report			
Reporting of statistical			
Conservations and management measures	Rec. 13-13/14-10/19-04: Vessels submitted for inclusion in the ICCAT record retroactively	Four vessels (other bluefin tuna vessels) are concerned. Late notification by the operator of the start of their operations due to logistical emergencies. It should be noted that our administration has worked slower due to the health restrictions related to the COVID-19 pandemic.	12 May 2020
	Rec. 18-13: Farm report received late.	The results of intra-farm transfers carried out in 2020 were directly entered into the eBCD system within the deadlines.	12 August 2020
Catch limits/quotas	Rec. 11-11 /16-16: Some differences were observed between Task 1 and compliance tables.	The difference relates to bycatch declared and not taken into account in ST02 (Task 1).	Supporting letter submitted on 18 December 2020. Corrected ST02-2018 submitted on 23 December 2020.
Other issues			

Mr Derek Campbell  
ICCAT Compliance Committee Chair  
Info.@iccat.int

Dear Mr Compliance Committee Chair,

I have the pleasure of contacting you in reference to your letter dated 5 August 2021. In addition to my Oficio No. INCOPECSA-PE-979-2021 dated 18 August, please find attached the compliance letter response and a copy of Nota No. INCOPECSA-PE-1118-2021, addressed to the Executive Secretary of ICCAT and dated 20 September 2021, through which Costa Rica provided information corresponding to 2019 and 2020 in accordance with the indicated requirements. Likewise, I provide some responses to the indications of the "2018-2019 Biennial Report", Vol. 1, Spanish version.

Yours sincerely,



**Daniel Carrasco Sánchez**  
**Executive Chairman of INCOPECSA**

Cc.

Mr Raúl Delgado, ICCAT Commission Chairman  
Mr Renato Alvarado, Minister of Agriculture and Stockbreeding  
Mr Marlon Monge, Deputy Minister of Agriculture and Stockbreeding  
Mr Camile Jean Pierre Manel, ICCAT Executive Secretary  
\*\*MLA file

## Compliance letter – Costa Rica

<b>Compliance matters identified in the 2020 correspondence process:</b>			
<b>CPC: COSTA RICA</b>			
<b>CATEGORY</b>	<b>COMPLIANCE MATTER</b>	<b>REMEDIAL ACTION TAKEN</b>	<b>DATE MISSING DATA/ INFORMATION SENT (if applicable)</b>
Response to COC Chair letter from previous year	Costa Rica acknowledged receipt of this letter, but no reply was received.	Oficio INCOPECA-PE-979-2021	18 August 2021
Annual report	No Annual Report received.	Oficio INCOPECA-PE-1118-2021.	20 September 2021
Statistical data reporting	No statistical data received.	Oficio INCOPECA-PE-1118-2021.	20 September 2021
MCS measures	Rec. 18-09; No list of designated ports received. (In CP24-AuthPorts_TRI.xlsx).	Oficio INCOPECA-PE-1118-2021.	20 September 2021
Catch limits / quotas:	Rec. 11-11 /16-16: No compliance tables received (In CP13-COC_Sec.xlsx).	Oficio INCOPECA-PE-1118-2021.	20 September 2021
	Rec. 18-05; Significant overage of white marlin in several recent years.	Oficio INCOPECA-PE-1118-2021.	20 September 2021
	Rec. 19-30 Significant overage of swordfish in several recent years.	Oficio INCOPECA-PE-1118-2021.	20 September 2021
Other issues:	Costa Rica acknowledged receipt of the COC Chair's letter following the 2019 meeting, but no reply	Oficio INCOPECA-PE-1118-2021.	20 September 2021

**Mr. Camille Jean Pierre Manel**  
**Executive Secretary**  
**International Commission for the Conservation of Atlantic Tunas, Madrid, Spain**  
**info@iccat.int**

**Dear Mr. Executive Secretary,**

I am writing with regard to the “**2018-2019 Biennial Report**”, Vol. 1, Spanish version, extracted from the webpage, which we have not yet officially received from ICCAT. This report refers to a series of incompliances by Costa Rica as a Cooperating Non-Contracting Party which are reflected in the ICCAT Panel 1 Compliance Table (page 411) received from Mr. Derek Campbell, Compliance Committee Chair, in Letter 5905-21 dated 5 August 2021, urging Costa Rica to provide a response before 1 October 2021, and the letter dated 22 March 2021, which stated the following:

*During the Commission’s decision-making process, the Compliance Committee reviewed the information available for the application of Rec. 11-15 which stipulates that CPCs that do not report Task 1 data, including zero catches, for one or more species for a given year, in accordance with SCRS data reporting requirements, shall be prohibited from retaining such species as of the year following the lack of or incomplete reporting until such data have been received by the ICCAT Secretariat. It was also established that no data or confirmation of zero catches had been received from Costa Rica in 2021. Therefore, in accordance with Rec. 11-15, Costa Rica is prohibited from retaining any ICCAT species, tuna-like species and associated shark species until this information is received.*

I wish to respond to the aforementioned letter in this current missive, as well as provide the corresponding information and indicate a series of comments in favour of Costa Rica’s fishing interests in accordance with our national legislation, in addition to the applicable standards and principles of international law.

In August 2016, Costa Rica submitted a request to ICCAT to obtain the status of “*Cooperating Non-Contracting Party*”, as an expressions of our country’s political will and interest in becoming a “*Contracting Party*” in the future, once the ICCAT Convention is duly approved by the Legislative Assembly and ratified by the Executive Branch.

In the principle of good faith, from this date our country undertook to collaborate by submitting statistical fishing data and fulfilling information requirements related to ICCAT management and conservation measures.

According to our information records, the Annual Reports from 2016 to 2018 and the respective Billfish and Shark Check Sheets, as well as other information sheets that were requested, were submitted correctly within the established deadlines. Nonetheless, Costa Rica was not made aware of these supposed overages of white marlin and North Atlantic swordfish at any point during this period. Nor was it informed that the information in these forms was incomplete.

Due to an involuntary error, throughout 2019 and 2020 ICCAT continued to send correspondence to the email address [rrramirez@incopesca.go.cr](mailto:rrramirez@incopesca.go.cr), head of the Regional Office of Limón, who stopped working for INCOPESCA in May 2019. These messages were also incorrectly sent to the email address of Mr Gustavo Meneses ([gmeneses@incopesca.go.cr](mailto:gmeneses@incopesca.go.cr)) until June 2020, despite the fact that he left his post as Executive Chairman on 30 April 2018.

We detected these communication errors in June 2020 as a result of informal consultations received from Central American colleagues regarding information from ICCAT. In order to correct this error, Oficio No. INCOPESCA-PEP-524-2020 was immediately sent on 31 July 2020, indicating the people to which official ICCAT correspondence should be submitted.

Mr Executive Secretary, with regard to your request, please find attached the forms corresponding to the Compliance Table, Tasks 1, 2 and 3:

Form code	COMPLIANCE TABLE FORMS	YEARS
	Annual Reports	2019 and 2020
CP01-VessLsts	Authorised vessels in the ICCAT record	2019 and 2020
CP24-AuthPorts_Tri	Authorised ports for landing/transshipment of EBFT and the entry of foreign vessels into CPC ports	2021
CP41-NSWOPlan	Vessel characteristics and management measures for swordfish	2019 and 2020
BillCkSheet	Billfish Check Sheet	2019 and 2020
CP44-BirdMit- TRI	Implementation of mitigation measures for birds	2019 and 2020
ShkCkSheet	Shark Check Sheet	2019 and 2020
ST01-T1FC:	Fleet Characteristics	2019 and 2020
ST02-T1NC:	Nominal catches	2019 and 2020
ST03-T2CE:	Catch and effort	2019 and 2020
ST04-T2SZ:	Size sampling (tuna-like species and sharks)	2019 and 2020
ST05-T2CS:	Catch-at-size estimations	2019 and 2020
ST09-DomObPrg	Observer programme	2019 and 2020
TG01-CnvEleTSurv	Summary of tagging activities	2019 and 2020
TG02-CnvTReRc	Tagging-release with conventional tags	2019 and 2020
TG03-EleTReRc	Electronic tagging	2019 and 2020

Please do not hesitate to contact me in the event of any clarifications or suggestions with regard to the aforementioned forms. Likewise, I would be pleased to help if a consultation process were necessary.

Mr Secretary, in addition to the information listed above, I also wish to provide our clarifications and arguments related to the indications regarding Costa Rica in the 2018-2019 Annual Report:

1. **Regarding the 2019 and 2020 Annual Reports:** As previously stated, the problems experienced in providing these Annual Reports and other compliance forms on time were due to involuntary communication errors between ICCAT and INCOPECSA. We have corrected this aspect by forming an Institutional Team to deal with ICCAT and IATTC matters.
2. **Regarding statistical data:** We have reviewed the INCOPECSA database. Following a data and biological sample collection process, particularly as regards white marlin, carried out over a period of several weeks by the Research Department and staff at the INCOPECSA Regional Office of Limón, the following points were established:

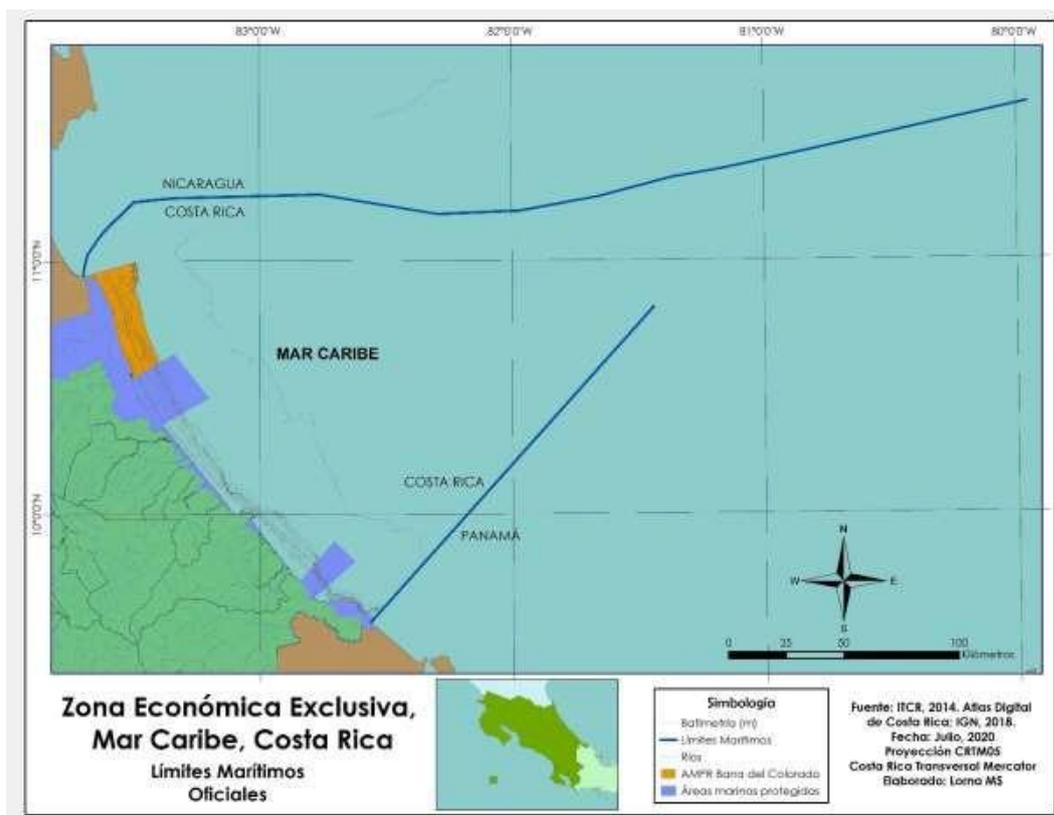
“The species *Makaira nigricans* is a fish belonging to the Istiophoridae family, which, according to the Guide for the Identification of Atlantic Istiophorids (Ochoa and Beerkircher, n.d.) have a robust and thick body in cross section; very steep head profile; first dorsal fin long and pointed at anterior part, lower at posterior part; lateral line forming a reticulated system in young fish (obscure in adults), anal opening relatively close to anterior origin of first anal fin; several rows of longitudinal stripes on sides, each composed of blue round spots on body light round dots and symmetrical gonads. This species is widely distributed around the globe and is found in the Caribbean Sea (Robertson *et al.*, 2019). Figure 1 (annex) shows a photograph of a whole individual of this species caught in the Caribbean Sea of Costa Rica, mainly by the commercial medium-scale fleet. This species is often landed in the country without the head and guts. However, in this case a whole individual was obtained following a request made to the fishing sector.

In the ICCAT document Glossary of Fishery Terms (ICCAT, n.d.) the species *Makaira nigricans*, commonly called blue marlin, is assigned the ICCAT species code BUM. Locally in Costa Rica, this same species is also known by the name *marlin blanco*, or white marlin in English, and is registered in INCOPESCA's databases under this local name. As a result, we must clarify that the white marlin catch data reported to ICCAT by Costa Rica for 2015, 2016, 2017 and 2018 were actually referring to blue marlin (*Makaira nigricans*, code BUM), in accordance with the nomenclature used by ICCAT. This confusion resulted from the erroneous association of *marlin blanco*, which is actually blue marlin, with white marlin, due to the colour used in both common names.

- 3. Regarding the significant overage of white marlin (195 t):** Regarding the information contained in the Biennial Report identifying excess white marlin landings of 55.24 in 2015, 45.00 t in 2016, 69.20 t in 2017 and 35.10 t in 2018, and indicating a landing limit of 2 metric tonnes for Costa Rica. In this regard, we reject and object to this indication in the Biennial Report as the landing limits expressed in **Recommendation 19-05** to establish rebuilding programmes for blue marlin and white marlin/roundscale spearfish are aimed at vessels that must be in the ICCAT record of vessels 20 meters in length overall or greater, considering **Recommendation 13-13**, these vessels are known as "**Large-Scale Fishing Vessels**" LSFV and have a large fishing and storage capacity, can move between Oceans with ease and have a high capacity to operate in the Convention area without appearing in the Commission record.

In virtue of the above, Costa Rica believes that it has not infringed any ICCAT Recommendations. It has not made use of the 2-tonne and 10-tonne landing limits for white marlin and blue marlin, respectively, as our country does not have any LSFV vessels to make the corresponding catches and landings. In this regard, we wish to clarify to the Commission that landings during the aforementioned years and to the present day are made by the national artisanal fishing fleet with an overall length of under 20 metres. Therefore, they are not regulated by ICCAT provisions. Costa Rican vessels that operate within our territorial waters carry out this activity in the coastal area and are regulated by Act 8436 on Fishing and Aquaculture. In addition, they have valid licenses and their fish products are consumed locally in our country. Due to the nature and size of Costa Rica's national vessels, the implementation of a scientific observer programme, as specified in Recommendation 19-05, is impossible.

Considering that the national fishing fleet is small-scale and artisanal, in addition to the fact that the vessels have an overall length of less than 20 metres, Costa Rica wishes to invoke point 10 of Recommendation 17-02, to be exempt from the provisions of paragraph 4 of this Recommendation on catches and landings, as white marlin and blue marlin are for local consumption in our country.



4. **Regarding the significant overage of North Atlantic Swordfish (120 t):** Regarding the information contained in the Biennial Report identifying excess North Atlantic swordfish landings of 27 t in 2015, 21.3 t in 2016, 32 t in 2017 and 40 t in 2018, and indicating a landing limit of 0 (zero) metric tonnes for Costa Rica. In this regard, we reject and object to this indication in the Biennial Report as the landing limits expressed in **Recommendation 17-02** for the Conservation of North Atlantic Swordfish are aimed at vessels that must be in the ICCAT record of vessels 20 meters in length overall or greater, considering **Recommendation 13-13**, seeing as these vessels are known as *“Large-Scale Fishing Vessels” LSFV* and have a large fishing and storage capacity, can move

*“Rec. 17-02. point 13.) CPCs shall issue specific authorizations to vessels 20 meters LOA or greater flying their flag that are authorized to fish for North Atlantic swordfish in the Convention area. Each CPC shall indicate which of such vessels it has so authorized on its vessel list submitted pursuant to the Recommendation by ICCAT Concerning the Establishment of an ICCAT Record of Vessels 20 meters in Length Overall or Greater Authorized to Operate in the Convention Area [Rec. 13-13].*

In virtue of the above, Costa Rica believes that it has not infringed any ICCAT Recommendations. It has not made use of the 0-tonne landing limit for North Atlantic swordfish, as our country does not have any LSFV vessels to make the corresponding catches and landings. In this regard, we wish to clarify to the Commission that landings during the aforementioned years and to the present day are made by the national artisanal fishing fleet with an overall length of under 20 metres. Therefore, they are not regulated by ICCAT provisions. The 14 Costa Rican vessels that operate within our territorial waters carry out this activity in the coastal area and are regulated by Act 8436 on Fishing and Aquaculture. In addition, they have valid licenses and their fish products are consumed locally in our country.

5. **Regarding the Billfish Checksheet (Rec. -12-02):** With regard to the Commission's present request, the *Billfish Sheet* forms for 2019 and 2020 were submitted on 14 September 2021, through Oficio INCOPECA- PE-1088-2021.

6. **Regarding the Shark Checksheet (Rec-12-02):** With regard to the Commission's present request, the *ShkCkSheet* forms for 2019 and 2020 are attached to this Oficio No. INCOPECA-PE-1118-2021.
7. **Regarding the list of designated ports (Rec-12-07):** It should be noted that Costa Rica reported the designation of Port Moin, region of Limón, as the official port for landing and entry of foreign vessels to the FAO's Global Record of Fishing Vessels in August 2019. We hereby proceed to report the designation of Port Moin as the official port for receiving the above-mentioned vessels, as well as the designation of points of contact to ICCAT through the form *CP24-AuthPorts\_Tri*.
8. **Communication of the Record of Accredited National Fishing Vessels in the Caribbean Sea to the ICCAT Vessel Record:** Although Costa Rica understands that its national fishing fleet operating in the Caribbean Sea is not affected by **Recommendation 13-13**, which is aimed at vessels of 20 meters in length overall or greater, and these vessels are known as "*Large-Scale Fishing Vessels*" *LSFV*, it wishes to share its official record of Costa Rican vessels carrying out fishing operations in the Caribbean Sea.

Costa Rica's artisanal fishing fleet has 200 vessels with an overall length of under 20 metres in the Caribbean Sea, which all have the corresponding valid fishing licenses and duly authorised fishing gears, in accordance with our national legislation. They develop their activities in the coastal area within our territorial waters. Fourteen of these vessels use surface longline to catch multiple species, including sharks, tuna-like species, and swordfish. The remaining 176 vessels have a licence and authorised fishing gear to catch various species such as rainbow runner, porgy, shrimp and lobster. All fish products caught by these 200 vessels are for local consumption in our country. It goes without saying that the license system is closed, i.e., no new fishing licenses can be issued for these fisheries.

In the Caribbean Sea, Costa Rica has 19 vessels under 10 metres overall length and with the corresponding fishing licenses, which are dedicated to sport and touristic fishing. They catch and release fish in accordance with national regulations. They are authorised to use 5 pieces for personal consumption and are not allowed to sell fish products. Seven fishing tournaments take place in the Costa Rican Caribbean Sea. They are duly regulated and controlled by the corresponding authorities.

**Our fishing rights in light of the regulations and principles of international law:** In accordance with the above, Costa Rica wishes to recall a series of standards and principles in international law that have been used by other Contracting Parties within the Commission on previous occasions, and which we would like to invoke on this occasion to safeguard our fishing rights, as well as the international prestige and image of Costa Rica upon the occasion of our bicentenary as a free, sovereign and independent state, and, of course, as a Developing State that has been negatively affected by international organisms, RFMOs, non-governmental organisations and national and international public opinion:

1. The United Nations Convention on the Law of the Sea- UNCLOS, Articles 58 and 116, on the rights to fish in the Exclusive Economic Zone and on the high seas, establish that all States have the right for their nationals to engage in fishing, but subject to, inter alia, the rights and duties as well as the interests of coastal States. Furthermore, in Articles 62 and 119 of the Convention on the conservation of the living resources of the high seas, UNCLOS states that in determining the allowable catch and establishing other conservation measures for the living resources in the Exclusive Economic Zone and the high seas, States shall take measures which are designed, on the best scientific evidence available to the States concerned, to maintain or restore populations of harvested species at levels which can produce the maximum sustainable yield, as qualified by relevant environmental and economic factors, including the special requirements of developing States. The same article also requires the States concerned to ensure that conservation measures and their implementation do not discriminate in form or in fact against the fishermen of any State.
2. In the United Nations Fish Stock Agreement, there is an entire section, Part VII, on the special requirements of Developing States, including Article 24, obliging states to take into account the vulnerability of developing States which are dependent on the exploitation of living marine resources, including for meeting the nutritional requirements of their populations; the need to avoid adverse impacts on, and ensure access to fisheries by, subsistence, small-scale and artisanal fishers and to ensure that conservation and management measures do not result in transferring, directly or indirectly, a disproportionate burden of conservation action onto developing States. In

Article 25, it requires all States to cooperate, inter alia, to enhance the ability of developing States, to conserve and manage straddling fish stocks and highly migratory fish stocks and to develop their own fisheries for such stocks in the Exclusive Economic Zone; and to enable them to participate in high seas fisheries for such stocks, including facilitating access to such fisheries. That article is reiterated in Article 5 of the FAO Code of Conduct for Responsible Fisheries, which, in its Article 7, also calls upon States, when adopting conservation and management measures, to take into account the interests of fishers, including those engaged in subsistence, small-scale and artisanal fisheries.

3. The FAO Conference, in its resolution adopting the Code, also urged all States, in implementing its provisions, to take into account the special requirements of developing countries. In 2014, the FAO Committee on Fisheries adopted the Guidelines for Securing Sustainable Small-Scale Fisheries, which, among over a hundred paragraphs recognizing the importance of small-scale fisheries to food security and poverty alleviation, calls upon States to adopt measures to facilitate equitable access to fishery resources for small-scale fishing communities, including, as appropriate, redistributive reform.
4. In the United Nations General Assembly Resolution 66/288, on the Future we Want, United Nations Member States not only urged the identification and mainstreaming of strategies that further assist developing countries, in developing their national capacity to conserve, sustainably manage and realize the benefits of sustainable fisheries, but also committed themselves to observe the need to ensure access to fisheries and the importance of access to markets, by subsistence, small-scale and artisanal fisherfolks and their communities, particularly in developing countries. More recently, member States of the United Nations agreed on the Sustainable Development goals, requiring States, in Goal 14b, explicitly to provide access for small-scale artisanal fishers to marine resources and markets, a requirement that was reiterated by the 33rd FAO Committee on Fisheries, as reflected in Paragraph 66, of the report of the meeting that happened in July 2019.

After having highlighted the points above, we wish to state the following:

1. As a Cooperating Non-Contracting Party, Costa Rica never intended to infringe management and conservation measures or delay the decision-making process of the Commission and its subsidiary bodies.
2. We regret the communication problems between ICCAT and INCOPESCA and express our will and availability to solve them and continue working with ICCAT on the management and conservation of tuna and tuna-like species in the Convention Area.
3. Our coastal artisanal fleet operating in the Costa Rican Caribbean Sea has the right to carry out fishing activities, respecting all the standards and provisions in our national legislation. Therefore, it may not be interpreted for any reason or under any circumstances that the Costa Rican fleet in general is partaking in illegal, undocumented and unregulated fishing activities due to any delays or errors in the submission information requirement forms, for which there is an increasing demand from both regional and international organisms, by the Costa Rican fishing authority to ICCAT, as one Contracting Party unfortunately indicated. This generates uncertainty and affects the international trade of our fish products on international markets, in addition to Costa Rica's international prestige and image.
4. After reviewing several Recommendations related to the allocation and distribution of quotas in different fisheries, Costa Rica has reasonable doubts with regard to the objective criteria of proportionality and equity, which could be used to make decisions and should be carefully and painstakingly reviewed and considered to ensure that international fisheries are managed correctly, by managing and conserving the sustainability of fishery resources in the Convention Area, from which we are by no means excluded.

Finally, as part of our spirit of collaboration with ICCAT in terms of the management and conservation of our Caribbean fisheries, I attach our *"Proposal for amendment from 2022 to 2025 for tuna and tuna-like species fisheries in Costa Rica's territorial waters of the Caribbean Sea"* as Annex 1.

Mr. Secretary, I would be extremely grateful that you inform all Contracting Parties, Cooperating Parties, Entities or Fishing Entities, and Observers of this message in a timely fashion.

Furthermore, I kindly request that Costa Rica be given an adequate amount of time during the upcoming 27th Regular Meeting of the Commission, which will be held online from 15 to 26 November 2021, in order to discuss the above-mentioned indications in the 2018-2019 Biannual Report. We would be grateful that you inform of us the date and time designated for this purpose.

Yours sincerely,



**Daniel Carrasco Sánchez**  
**Executive Chairman of INCOPECA**

CC

Sr. Rodolfo Solano; Ministro de Relaciones Exteriores y Culto

Sr. Andrés Valenciano, Ministro de Comercio Exterior

Mr Renato Alvarado, Minister of Agriculture and Stockbreeding

Mr Marlon Monge, Deputy Minister of Agriculture and Stockbreeding

\*\*MLA file

Attachment: Annex 1

## ANNEX

**Plan de Enmienda del 2022 al 2025 para las pesquerías de atunes y especies afines, en aguas jurisdiccionales del Mar Caribe costarricense.**

Nuestro país posee una limitada Zona Económica Exclusiva en el Mar Caribe de tan solo 24.000 kilómetros cuadrados, cuya batimetría y extensión ha permitido el desarrollo muy conservador de la pesca de pequeña escala con productos de peces de escama como las corvinas (esciénidos) y jureles (carángidos), asimismo de crustáceos tales como la langosta del Caribe (*Panulirus argus*). Estas pesquerías no se encuentran abarcadas por la Comisión Internacional para la Conservación del Atún del Atlántico (ICCAT), por lo que sus datos no son objeto de reporte, no obstante, debemos resaltar que existe un continuo trabajo de investigación y análisis derivado sustancialmente de los programas de captura y análisis de datos, así como del control, seguimiento y vigilancia de cumplimiento de las medidas de ordenación, entre ellas vedas y en lo pertinente definición de tallas mínimas.

Nuestras embarcaciones desarrollan sus actividades en la zona costera dentro de nuestras aguas jurisdiccionales y cuyas capturas finalmente son para consumo nacional. Fourteen of these vessels use surface longline to catch multiple species, including sharks, tuna-like species, and swordfish. Las restantes 176 embarcaciones cuentan con sus licencias y artes de pesca para la captura diferentes especies como macarela, pargo, camarón y langosta.

En el Mar Caribe se tiene 19 embarcaciones que no superan los 10 metros de eslora, que se dedican a la pesca deportiva y turística, cuentan con sus respectivas licencias de pesca. Desarrollan su actividad de pesca y liberación según la normativa nacional, tienen autorización para utilizar 5 piezas para su autoconsumo personal y no están autorizadas para comercializar el producto pesquero. Seven fishing tournaments take place in the Costa Rican Caribbean Sea. They are duly regulated and controlled by the corresponding authorities. A partir del año 2022, se llevará a cabo inspecciones periódicas a las embarcaciones que realizan esta actividad.

Todas las actividades de pesca de nuestras embarcaciones nacionales se encuentran debidamente reguladas por la Ley 8436 de Pesca y Acuicultura, cuya legislación en caso de infracciones prevé el establecimiento de sanciones administrativas y penales. Las actividades pesqueras por ley están sometidas a las operaciones de control y vigilancia que realiza el Servicio Nacional de Guardacostas durante los 365 días del año, así como a los controles e inspecciones de las embarcaciones que realiza el INCOPECA.

Costa Rica desea continuar desarrollando durante el año 2022 y años subsiguientes sus actividades de pesca con las 200 embarcaciones de la flota pesquera artesanal de menos de 20 metros de eslora en el Mar Caribe, la cual cuenta con sus respectivas licencias al día y artes de pesca debidamente autorizadas de conformidad con nuestro ordenamiento jurídico, con respeto como siempre lo ha hecho a las disposiciones que se deriven de los Organismos Internacionales, las Organizaciones de Ordenación Pesquera, así como apegado a las normas y principios del derecho internacional. También aspira en el futuro a ejercitar sus derechos de pesca como Estado en Desarrollo, en la Zona de la Convención, con embarcaciones que puedan pescar en aguas internacionales y alta mar, razón por la cual aspira a convertirse en Parte Contratante de la ICCAT.

Conforme con lo anterior Costa Rica se propone realizar los esfuerzos necesarios con el fin de implementar el Plan de Enmienda con un horizonte temporal del 2022 al 2025, para las pesquerías de atunes y especies afines en las aguas jurisdiccionales del Mar Caribe. Cualquier modificación posterior al Plan de Pesca se notificará al Secretario Ejecutivo de la ICCAT.

CPC: COSTA RICA					
PLAN DE ENMIENDA PARA LAS PESQUERIAS DE ATUNES Y ESPECIES AFINES EN EL CARIBE 2022 A 2025					
CATEGORIA	ACCION EMPRENDIDA	2022	2023	2024	2025
<b>ACCIONES GENERALES</b>	Se tramita aprobación del Convenio ICCAT y Protocolo de enmiendas del 2019 ante la Asamblea Legislativa. 2. Se aprobó el Plan Nacional de Inspección de Desembarques y otras actividades conexas.	Se hará revisión de disposiciones normativas con el fin de ir equiparando las normativas del ICCAT con nuestras pesquerías.  AJDIP/077-2020 Reglamento de Balizas – revisar obligaciones para esta flota.	Con recursos del empréstito del Banco Mundial se espera iniciar construcción Terminal Pesquera en Limón. Esta terminal entre otras cosas incluirá un muelle donde se podrá recibir las embarcaciones con el producto pesquero, realizar inspecciones y muestreos biológicos pesqueros.	Gestionar el apoyo para realizar un estudio de investigación sobre prospección de los recursos pesqueros y estado de las poblaciones en la ZEE del Mar Caribe de Costa Rica, para la toma de decisiones en medidas de ordenamiento y conservación, con apoyo de la cooperación internacional.	<b>Una vez</b> aprobado el Convenio de la ICCAT, solicitar los derechos de pesca que le corresponde a Costa Rica en la zona de la Convención y realizar los esfuerzos por incursionar en las pesquerías del atún y especies afines, con embarcaciones de 20 metros de eslora o superior.
<b>Comunicación de Estadísticas pesqueras</b>	Se realizó corrección en la base de datos ubicando en forma correcta los nombres comunes de las especies del aguja blanca y aguja azul, con el fin de mejorar los reportes estadísticos a partir del 2022 según los registros que se lleva en ICCAT.	<ol style="list-style-type: none"> <li>1. Mejorar la recopilación y análisis de datos estadísticos.</li> <li>2. Se está desarrollando un software y app para el registro de la información de los Formularios de Inspección de desembarque (FID), Libros de Operación de Pesca, hojas de lances</li> <li>3. Se desarrollará un programa anual de capacitaciones sobre captura de datos estadísticos.</li> <li>4. Se llevará a cabo la actualización de los formularios relacionados con</li> </ol>	1. Registrar la información producto de las faenas de pesca e inspecciones en el software y app		

		el FIP			
<b>Especie de Pez Espada del Atlántico norte</b>	Se realizó revisión de las disposiciones normativas, la cual se encuentra regulada por la Ley 8436. Costa Rica cuenta con embarcaciones artesanales que no superan los 20 metros de eslora. No le aplica la Rec.17-02.	<ol style="list-style-type: none"> <li>1. Mejorar la trazabilidad.</li> <li>2. Actualizar los formularios de Inspección de Desembarque según las particularidades de las pesquerías del caribe de Costa Rica.</li> <li>3. Implementar los Libros de Operación de Pesca, hoja de lances en la pesquería multiespecífica del caribe.</li> <li>4. Desarrollar un programa anual de muestreos biológicos – pesqueros.</li> <li>5. Mejorar la recopilación de datos estadísticos.</li> </ol>	Desarrollar con el apoyo de la ICCAT, un programa nacional de observadores abordo que incluya el monitoreo electrónico para las embarcaciones de la flota pesquera artesanal de menos de 20 m de eslora que tiene Costa Rica	Implementar el programa de observadores abordo en las pesquerías del caribe de Costa Rica	
<b>Especie de Pez aguja blanca</b>	Se realizó revisión de las disposiciones normativas, la cual se encuentra regulada por la Ley 8436. Costa Rica cuenta con embarcaciones artesanales que no superan los 20 metros de eslora.  No le aplica la Rec.13-13.	<ol style="list-style-type: none"> <li>1. Mejorar la trazabilidad.</li> <li>2. Actualizar los formularios de Inspección de Desembarque según las particularidades de las pesquerías del caribe de Costa Rica.</li> <li>3. Implementar los Libros de Operación de Pesca, hoja de lances en la pesquería multiespecífica.</li> <li>4. Desarrollar un programa anual de muestreos biológicos – pesqueros. Mejorar la recopilación de datos estadísticos.</li> </ol>			

<b>Registro de embarcaciones</b>	Se comunica a ICCAT las 200 embarcaciones de la flota artesanal que tiene Costa Rica, cuya eslora no supera los 20 metros. Dentro de estas, están las 14 embarcaciones que realizan actividades de pesca multiespecifica de especies abarcadas por la convención del ICCAT.				
<b>Registro de embarcaciones para pez espada</b>	Se comunica a ICCAT las 14 embarcaciones artesanales de menos de 20 metros de eslora que realizan actividades de pesca multiespecifica de especies abarcadas por la convención de ICCAT, entre ellas, el pez espada, que cuentan con licencia				
<b>Tiburones</b>	<p>1. Se está en la implementación del Plan de Acción Nacional para la conservación y ordenación de los Tiburones en Costa Rica.</p> <p>2. En el marco de OSPESCA Costa Rica ha estado participando para la actualización del Plan de Acción Regional para la Conservación y Ordenación de tiburones para los países parte de OSPESCA</p>	<p>1. Mejorar la trazabilidad.</p> <p>2. Implementar los Libros de Operación de Pesca en la pesquería multiespecifica de las especies abarcadas por el ICCAT.</p> <p>3. Desarrollar un programa anual de muestreos biológicos – pesqueros. Mejorar la recopilación de datos estadísticos.</p>			
<b>Embarcaciones de pesca deportiva y turística.</b>		A partir del año 2022, se llevará a cabo inspecciones periódicas a las 19 embarcaciones que no superan los 10 metros de eslora, que realizan esta actividad.			

<p><b>Monitoreo, control y vigilancia de embarcaciones.</b></p>	<p>Todas las actividades de pesca de nuestras embarcaciones nacionales se encuentran debidamente reguladas por la Ley 8436 de Pesca y Acuicultura, cuya legislación en caso de infracciones a la ley, prevé el establecimiento de sanciones administrativas y penales. Las actividades pesqueras están sometidas a las operaciones de control y vigilancia que realiza el Servicio Nacional de Guardacostas que realiza sus actividades durante los 7 días de la semana, las 24 horas, durante los 365 días del año, , así como a los controles e inspecciones de las embarcaciones que realiza el INCOPECA, el MINAE dentro de las Áreas Marinas Protegidas, así como el Ministerio de Obras Públicas y Transportes en lo que se refiere a sus certificados de navegabilidad</p>	<p>A partir del 2022, las embarcaciones con una eslora superior a los 12 metros de eslora deberán integrar como parte de sus obligaciones un VMS, que deberá transmitir su señal al Centro de Monitoreo Satelital del INCOPECA, conforme al AJDIP/077-2020 Reglamento de Balizas</p>			
<p><b>Designación de Puertos</b></p>	<p>Costa Rica tiene asignado en Limón, asignado el Puerto de Moín, para el desembarque de productos pesqueros de la flota extranjera. El cual hasta el día de hoy no se ha utilizado . El punto de Contacto es Dpto. de Registro del INCOPECA, señor Julio Dijeres Bonilla y el señor Edwin Salazar Serrano, Jefe del Dpto. de Fiscalización.</p>		<p>Con recursos del empréstito del Banco Mundial se espera iniciar construcción Terminal Pesquera en Limón. Esta terminal entre otras cosas incluirá un muelle donde se podrá recibir las embarcaciones con el producto pesquero, realizar inspecciones y muestreos biológicos pesqueros.</p>		

## Compliance Letter Response Template - Guyana

Compliance Matters Identified in the 2020 Correspondence Process			
CPC: GUYANA			
CATEGORY	COMPLIANCE MATTER	REMEDIAL ACTIONS TAKEN OR PLANNED	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year	No response received	Staff responsible for ICCAT reporting has retired and we are not in receipt of this letter. The Department would appreciate if a copy can be resent	
Annual Report	Annual Report received late and some responses incomplete	2020 Annual report sent and was send back for some corrections	September 17, 2021
Statistical data reporting			September 17, 2021
Conservation and Management Measures	<b>Rec. 18-05 and 18-06:</b> No Billfish check sheet and updated shark sheet received.		September 17, 2021
Catch limits/quotas	<b>Rec.16-16/18-07[11-11]:</b> Compliance tables received late.  <b>Rec. 18-05:</b> Potential overharvest of white marlin (WHM)and blue marlin (BUM)  <b>Rec. 17-03:</b> Potential overharvest of South Atlantic Swordfish	A cease order was sent to the lone Tuna operator  A cease order was sent to the lone Tuna operator	Sent October 1, 2021
Other issues	<p>The Fisheries Department of Guyana would like to highlight some of the challenges that we are facing regarding reporting and accurate data collection.</p> <ul style="list-style-type: none"> <li>– Staff retired who was responsible for ICCAT related matters. This staff also had difficulties in reporting but the staff was a very senior official and there were difficulties.</li> <li>– A staff who recently returned from a Master’s Programme was identified to deal with ICCAT matters. He is quite new to the process so there may be some teething problems. We would have requested from the Caribbean Regional Fisheries Mechanism assistance in the form of capacity building for our staff. This process has commenced.</li> <li>– COVID- 19 has resulted in a lot of disruptions as we all are aware. The Government mandated all employees to be vaccinated before entering place of work, this caused some disruption in work as some staff were reluctant to take the vaccine.</li> <li>– As a small developing country, we have challenges with our staffing and other resources. We are trying out best to overcome our challenges so that we can be able to have better and timely reporting and more accurate data</li> <li>– The Fisheries Department would to commit and assure the Commission that we are working diligently to overcome our challenges and to better comply with our responsibilities to ICCAT.</li> </ul>		

Ministry of Agriculture  
Fisheries Department Regent & Vlissengen  
Roads Bourda,  
Georgetown

**August 13, 2021**

Mr. Pritipau I Singh Chief Executive  
Priti pau I Investments Inc. Mc Doom village  
East Bank Demerara

Dear Mr. Singh,

Re: Notification to cease harvesting of Blue Marlin, White Marlin and Swordfish

Please be informed that with **IMMEDIATE EFFECT** you are instructed to cease the harvesting of Blue Marlin, White Marlin and Swordfish.

It was also reported by the United States Department of Commerce National Oceanic and Atmospheric Administration that Guyana is being identified for having vessels that engaged in fishing activities or practices that result in bycatch of sea turtles, a PLMR, in longline fisheries in the ICCAT convention waters **beyond national jurisdiction.**

Please note that you are not licensed to fish in waters beyond national jurisdiction and you should immediately desist from such practices and whilst in national waters please ensure that measures are put into place to ensure that marine turtles are not caught.

For bycatch, the United States requires U.S. pelagic longline vessels that are permitted to fish for tunas and swordfish in ICCAT waters to use only corrodible (i.e., non-stainless steel) 18/0 or larger circle hooks with an offset not to exceed 10 degrees, or 16/0 or larger non-offset circle hooks, as well as to use only whole finfish and/or squid bait. Bottom longline vessels are also required to use circle hooks. Identified nations and entities are not required to adopt management measures identical to those of the United States in order to receive a positive certification, but rather they must adopt measures that are comparable in effectiveness to those of the United States.

In this stead, you are required to submit to the Office of the Chief Fisheries Officer all information regarding your tuna fishing. This includes your method of fishing, size and type of hooks, types of baits.

Please note also that you are required to inform the Fisheries Department of the arrival of your Tuna vessels to Pollso that a Fisheries Official will be there to inspect the catches before it is offloaded. Failure to do so will result in not being able to export your catches.

You are also required to ensure that all data should be submitted in a timely manner in a species-specific format.

All for your information and guidance

Denzil Roberts  
Chief Fisheries Officer

Cc: Hon. Zulfikar Mustapha, M.P. Minister of Agriculture

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Ms. Delma Nedd, Permanent Secretary  
Minister of Agriculture