

Original: English/Español

**RESPONSES TO COC CHAIR LETTERS
RECEIVED AFTER THE DEADLINE**

RÉPONSES AUX LETTRES DU PRÉSIDENT DU COC REÇUES HORS DÉLAI

**RESPUESTAS A LAS CARTAS DEL PRESIDENTE DEL COC
RECIBIDAS DESPUÉS DE LA FECHA LÍMITE**

This addendum contains the responses, in original language only, received after 21 October 2020 from:

Cet addendum contient les réponses reçues après le 21 octobre 2020 dans la langue originale uniquement de :

Este addendum incluye las respuestas, sólo en su idioma original, recibidas después del 21 de octubre 2020 de:

- Barbados
- Curaçao
- Bolivia



*Ministry of Maritime Affairs,
And the Blue Economy*

FISHERIES DIVISION

Princess Alice Highway, Bridgetown, Barbados. BB11144

E-mail: Fisheries.Division@barbados.gov.bb

Our Ref.:

Your Ref.:

Tel.: (246) 535 5800

Fax: (246) 436-9068

101/13
October 31, 2020

Mr. Derek Campbell
Compliance Committee Chair
International Commission for the Conservation of Atlantic Tunas (ICCAT)
Corazón de Maria, 8 - 28002
Madrid
SPAIN

Dear Sir

**BARBADOS Fisheries Division's Response to Compliance Committee
Letter of 21 September 2020 S20-06465**

I refer to my letter of 20 October 2020, Ref. 101/13, in which I requested time to complete my response to the captioned compliance letter.

Please find attached my response in the guidance template.

Please accept the assurances of my highest consideration.

Sincerely

A handwritten signature in blue ink, appearing to read "J. Leslie".

Joyce Leslie (Mrs.)
CHIEF FISHERIES OFFICER

BARBADOS COMPLIANCE LETTER RESPONSE

2019 Commission Meeting		CPC: BARBADOS	
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year: replied			
Annual Report	Rec. 16-14: No observer programme yet in place so no data / information submitted (see Ref. 12-13).	<p>Ref. Item 4 .b of this recommendation precludes for safety reasons vessels less than 15 metres, from an observer programme. Barbados' longline vessels are too small (less than 15m overall length, except for 2 vessels of 17 m) to safely support non-crew on-board observers that would meet the applicable criteria for an observer under ICCAT standards</p> <p>Barbados would like to avail itself the opportunity as allowed to offer an alternative approach as the electronic monitoring system with use of video cameras is not seen as an action that can take place within the laws of Barbados. (Ref. Constitution of Barbados Section 11(b)).</p> <p>Barbados is of the opinion that all the data required under Ref. Item 7 of this recommendation (except gonads, otoliths, scales, spines, which would have to be done on a research vessel) can be obtained through improved regulations to buffet the adequate statistical representative catches currently reported.</p> <p>Barbados is currently reforming/upgrading its management regulations. One other project is in the pipeline to pilot electronic traceability of catch.</p>	
Statistical data reporting	Rec. 16-14: No domestic scientific observer program in place and no observer data submitted (via form ST09-DomObPrg.xlsx).		

BARBADOS COMPLIANCE LETTER RESPONSE

2019 Commission Meeting		CPC: BARBADOS	
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Conservation and Management Measures	Recs. 10-09 and 13-11: Full implementation of turtle measures unclear (e.g. whether best handling practices are obligatory). Via form ST09-DomObPrg.xlsx .	<p>Barbados 1998 Fisheries (Management) Regulations provides comprehensive protection of marine turtles by the institution of an indefinite moratorium on the centuries-old practice of fishing of sea turtles, prohibiting the possession and sale or expose for sale turtles, turtle parts and eggs. This undeniably shows Barbados' longstanding commitment to turtle conservation, becoming one of the first territories in the Caribbean to comprehensively protect sea turtles.</p> <p>A survey-based study on turtle entanglements in longline gear for the local longline fishery determined that local fishers habitually released turtles that were entangled in the gear. This is done by cutting them from the lines, but means that short pieces of line are left attached.</p> <p>The Fisheries Division has already discussed with the Barbados Sea Turtle Project, opportunities for providing training of longline fishers in the use of line cutters for maximizing the safe release of entangled turtles</p> <p>The next steps therefore are to garnish the resources necessary to implement this training activity.</p> <p>Concomitantly, legislation mandating best handling practices is to be drafted and will have to be derived in concert with the above stated management measure to allow the removal of injured turtles from the water and allowing the <i>de facto</i> temporary “possession” required such that this recommendation can be implemented in its entirety.</p>	

BARBADOS COMPLIANCE LETTER RESPONSE

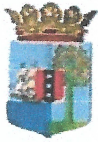
2019 Commission Meeting		CPC: BARBADOS	
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Conservation and Management Measures	Rec. 18-09: Unclear if entry of foreign fishing vessels is prohibited generally or on a case by case basis (via form CP24-AuthPorts_TRI.xlsx).	<p>Concerning the requirement to notify ports designated for landing or transshipment of ICCAT species by foreign flagged vessels and also noting the fact that Barbados as party in 2016 to the FAO Port State Measures Agreement also is obligated to ratify similar requirements in this agreement. The following currently obtains.</p> <p>There is only one sea port in Barbados, namely the Port of Bridgetown, at which foreign fishing vessels would be legally allowed to land or transship their catch or be inspected.</p> <p>The Fisheries Division administratively recognises the Bridgetown Port as the only official entry to Barbados of foreign vessels including foreign registered fishing vessels (including: carrier vessels, transport vessels). This is normal practice.</p> <p>Prior permission for any such activity by a foreign fishing vessel must be first obtained from the Chief Fisheries Office, and as noted in the Annual report, no such permissions were granted nor applied for by any foreign fishing vessel.</p> <p>The Barbados Harbour Port Regulations require notification of entry of vessels. These regulative requirements are applied as well as Customs procedures.</p> <p>Ref. Legislation Barbados Port Authority “Barbados Harbour Regulations 1961”</p>	The regulations to designate the Bridgetown Port although in draft have not been finalised. Legislative reform is taking place.

BARBADOS COMPLIANCE LETTER RESPONSE

2019 Commission Meeting		CPC: BARBADOS	
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Catch limits/quotas	Continued overharvest of BUM. Overharvest of WHM in 2018 (via ICCAT Compliance Reporting Table).	<p>Over the years of ICCAT’s severe stock rebuilding programs for the respective marlin species, Barbados was awarded very low catch limits, and incrementally accrued catches that exceed the island’s respective Blue Marlin catch limit and White Marlin quota.</p> <p>I note in Rec. 19.05 that ICCAT acknowledged that dead discards are <u>not accounted for in annual limits</u>. Barbados is of the view that it should not feel the onerous weight of meeting ICCAT’s recommendations in the face of supplying accurate information on its blue marlin and white marlin catches which are eaten and thus contribute to our food security, while being unclear about how the issue of dead discards of marlins at sea are being addressed which contribute to fishing mortality but are of no benefit to mankind’s survival.</p> <p>Barbados will be participating in a project focused on improving the island’s tuna value chain, which depends on the maintenance of a high quality product from the time that the tuna is landed on the boat. This would redound to increased profitability and it is expected that this will serve as an incentive for local fishers to adjust their fishing practices to both selectively optimize the chances for catching tunas while minimizing the chances for catching marlins, while in addition reducing the mortality of hooked fish before they can be taken onto the boat.</p> <p>These are the same suggested strategies for reducing marlin catches expected to be achieved by using non-offset circle hooks, which also reduces hooking mortality and thus facilitates live release of marlins, in concert with adjusting fishing depth to that which tunas are more likely to be taken as opposed to marlins.</p>	

BARBADOS COMPLIANCE LETTER RESPONSE

2019 Commission Meeting	CPC: BARBADOS	2019 Commission Meeting	
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Catch limits/quotas	Continued overharvest of BUM. Overharvest of WHM in 2018 (via ICCAT Compliance Reporting Table).	Barbados is located within a geographical area of relatively high abundances of all billfish including the 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. Under these circumstances substitution of non-offset circle hooks for the conventional “J” hooks used by the local fleet along with the release of live animals, and where practical adjusting the fishing depths of the gear, remain the only viable options for reducing marlin catches in this fishery.	
Issues			



MINISTERIE VAN
ECONOMISCHE ONTWIKKELING

To: Mr. Derek Campbell
CoC Chair
International Commission for the
Conservation of the Atlantic Tunas –
ICCAT
Corazón de María, 8 - 28002
Madrid – Spain

Date:
21 October 2020

Contact person:
Xavier Prens

E-mail address:
xavier.prens@gobiernu.cw

Our number: 2020/038964

Re: **LETTER ON COMPLIANCE ISSUES**

Dear Mr. Campbell,

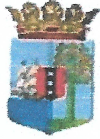
Thank you for your letter dated 21 September 2020. We have taken note of its contents and would like to respond as follows:

Regarding the late submission of our Annual Report, the Compliance Reporting Tables and some bigeye tuna quarterly catch reports, first and foremost, we would like to apologize for any inconvenience caused to the Commission and its Panels and Committees. We continuously aim for the highest standards of professional excellence, but we must admit we were not fully prepared to swiftly and thoroughly deal with the impact of the COVID-19 pandemic on our operations. It took us some time to adjust to the new normal, with its (partial) lockdowns and (drastic) health and safety measures.

Based on the lessons learned since, precautionary measures have been introduced in our internal planning and control cycles to guarantee a timely submission of said reports in 2021.

Furthermore, with regard to the matter of the Task 1 data, please be advised that, in keeping with your suggestion, 'zero catch' has been reported and added to the spaces previously shown as blank.

- In addition, regarding the matter of the small discrepancies between Task 1 figures and compliance reporting table figures for marlins (BUM / WHM) we have determined they are the result of the different method used for counting said categories. Whereas the Task 1 is based on fishing estimates made by the Captains on board, the compliance tables reflect real numbers, not estimates, reported once the fish has been duly unloaded at a port or factory. A small discrepancy between these numbers is almost unavoidable. In fact, it appears to be an issue amongst all tuna catch reporting tables and for many Member States. Any suggestions you might have to correct this would be highly appreciated.



MINISTERIE VAN
ECONOMISCHE ONTWIKKELING

Curacao takes pride in its membership with ICCAT, and its contribution to the preservation of the long-term health of our oceans. I therefore hope these answers clarify and resolve the compliance matters identified in your letter. Should additional information or documentation be needed however, please let us now.

In closing, Dear Sir, please accept the assurances of our highest esteem and consideration. We look forward to our continued engagement.

Sincerely yours,

Xavier C. Prens
Chairman of the International Fisheries Commission of Curacao



Ministerio de Defensa
Estado Plurinacional de Bolivia

La Paz, octubre 19, 2020
DGIMFLMM - UBPM N° 099 /20

Señor
Dereck Campbell
Presidente del Comité de Cumplimiento
COMISIÓN INTERNACIONAL PARA LA CONSERVACIÓN DEL ATÚN ATLÁNTICO
(CICAA)
Corazón de María, 8. 28002
Madrid
Reino de España. -

Señor Presidente del Comité de Cumplimiento:

Tengo el honor de dirigirme a usted en la oportunidad de dar respuesta a su comunicación con referencia S20-06465 del pasado día 21 de septiembre del año en curso, mediante la cual tuviera a bien trasladar a mi gobierno algunas deficiencias en la comunicación y en la implementación de sus obligaciones como No Parte Contratante Colaboradora de la Comisión observadas durante la 26ª Reunión ordinaria.

En tal sentido, sírvase encontrar, adjunto al presente oficio, los siguientes documentos destinados a dar respuesta oficial a dichas deficiencias, como sigue:

1. Respuesta a carta de cumplimiento, en formato de Word;
2. Informe anual de cumplimiento revisado, en Word y en *.pdf (firmado);
3. Catorce informes electrónicos para cumplir con los requisitos de información, en formato de Excel;
4. Oficio No. 89/20 mediante el cual se solicitó al personal de la Secretaría información para responder a su solicitud, en *.pdf.

Deseo agregar que el Estado Plurinacional de Bolivia tiene el firme propósito de cumplir cabalmente con sus obligaciones de información y comunicación con las organizaciones regionales con las cuales coopera, superando situaciones de orden político interno y la pandemia de la COVID-19, entre otros factores que han dificultado los trabajos de las personas e instituciones que se ocupan de la pesca marítima. Lo mismo ocurre en otras organizaciones a nivel mundial. De esa cuenta, mi gobierno desea indicar que cualquier insuficiencia será subsanada en el futuro cercano gracias al programa de mejora de la comunicación que se está implementando en Bolivia, cuyos frutos se apreciarán a partir del próximo año 2021.

Mi gobierno reconoce la necesidad de ceñirse a los plazos estipulados con precisión y por eso lamenta cualquier retraso o deficiencia. Únicamente quisiera destacar que la ausencia de una flota de pesca que enarbole el pabellón boliviano operando en el área del Convenio en los años recientes, de la que no hay mayores reportes de capturas que trasladar, no menoscaba los trabajos de la Comisión de una



Ministerio de Defensa
Estado Plurinacional de Bolivia

manera sustantiva ni afecta la sostenibilidad de las pesquerías que le han sido confiadas.

Con este motivo, saludo al Señor Presidente del Comité de Cumplimiento, expresándole las seguridades de mi distinguida consideración.



Almte. José Luis Velásquez Ortiz
**AUTORIDAD MARITIMA Y PORTUARIA DEL
ESTADO PLURINACIONAL DE BOLIVIA**



- CC: - Ing. Raúl Delgado, CICAA
- Sr. Camille Jean-Pierre Manel, CICAA
- CN. DAEN. William Gonzáles, UBPM
- TN. CGON. Ricardo Lora, UBPM
- Ab. M.A. Hugo Alsina
- Archivo

RESPUESTA A LA CARTA DE CUMPLIMIENTO - BOLIVIA

Reunión de la Comisión de 2019			
CPC BOLIVIA			
CAMPO DE LA DEFICIENCIA	ELEMENTO ESPECÍFICO	ACCIÓN EMPRENDIDA PARA REMEDIARLO	FECHA DE LOS DATOS QUE FALTAN/INFORMACIÓN ENVIADA (si procede)
Respuesta a la carta del presidente del COC del año anterior: No aplicable		No es necesaria ninguna acción	No procede
Informe anual	Informe anual incompleto (sin texto de resumen y «no aplicable» no explicado de forma adecuada)	Se remite nuevamente el Informe Anual de Bolivia explicando adecuadamente la respuesta “No aplicable” y con la inclusión del texto en la sección 1	19 de octubre de 2020
Comunicación de datos estadísticos		Se remiten de nuevo todos los datos estadísticos registrando cero capturas, por no disponer de una flota activa en 2019	19 de octubre de 2020
Medidas de conservación y ordenación	Rec. 18-05 y 18-06: Hoja de comprobación de istiofóridos y de tiburones recibidas con retraso.	El Estado Plurinacional de Bolivia se encuentra en el desarrollo de un proceso de mejora en el cumplimiento de las obligaciones de comunicación de información con la Comisión	No procede
Límites de captura / cuotas		No se emprende ninguna acción, por cuanto no hay una observación específica recogida en las actas de la 26ª Reunión, lo cual es consistente con la ausencia de una flota activa en el área del Convenio durante el período del informe	No procede
Otras cuestiones		No se emprende ninguna acción, por cuanto no hay una observación específica recogida en las actas de la 26ª Reunión, lo cual es consistente con la ausencia de una flota activa en el área del Convenio durante el período del informe	No procede