

Original: English/French/Spanish

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

**Annex 1** of document **COC-309** contains the letters sent by the COC Chair by **21 October 2020**. Replies received after the deadline will be presented as **Addendum** to **COC-309**.

RI= Reporting issues; II = implementation issues; 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	RI	05/10/2020	Yes	Yes
Algeria	II	19/10/2020	Yes (Picture format)	Yes - but alternative measures for observer programme awaiting endorsement by SCRS
Angola	RI/II			
Barbados	RI/II/OH	Acknowledged 20/10/2020		
Belize	II	20/10/2020	Yes	Yes
Brazil	II/RI	20/10/2020	No	Yes
Cabo Verde	RI			
China PR	II			
Côte d'Ivoire	RI			
Curaçao	RI			
Egypt	II	12/10/2020	Yes	yes
El Salvador	<b>ID</b> Letter	20/10/2020		
Equatorial Guinea	RI	15/10/2020	Yes	Yes, where available. See letter for explanations
European Union	RI	21/10/2020	Yes	Yes, where available. See template for explanations regarding information on pending legal case
France SPM	RI			
Gabon	RI			
Ghana	RI			
Grenada	<b>ID</b> 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			
Guatemala	RI	20/10/2020	Yes	Yes, where available
Guinea Bissau	<b>ID</b> letter - recurring significant reporting issues			
Guinea Rep.	<b>ID</b> letter	20/10/2020	Yes	No. See letter and template for explanations
Honduras	RI			
Liberia	RI/II			
Libya	RI/II			
Mauritania	RI/II			
Mexico	RI	20/10/2020	Yes	Yes
Namibia	<b>ID</b> letter - recurring significant reporting issues + recurrent overharvest of blue marlin	20/10/2020	Yes	Yes
Nicaragua	RI	15/10/2020	No	Partial. See letter for explanations
Nigeria	RI	20/10/2020	Yes	Partial. See letter for explanations
Panama	RI			
Philippines	RI			
Russia	RI	21/10/2020	Yes	Yes
São Tomé e Príncipe	RI			
Senegal	RI	29/09/2020	Yes	Mostly. No scientific observer programme in place so no data sent
Sierra Leone	RI			
St Vincent & Grenadines	RI	14/10/2020	Yes	Yes
Syria	RI	20/10/2020	Yes	Yes

<i>CPC</i>	<i>Letter type</i>	<i>Reply received</i>	<i>Template completed</i>	<i>Missing information sent</i>
Trinidad & Tobago	II	20/10/2020	Yes	Partial. See letter for explanations
UKOT	II	20/10/2010	Yes	Yes, where available – see their response re scientific observer programme
Vanuatu	RI			
Venezuela	RI	Yes – attached reply sent in November 2019	Template from previous year	Partial – See COC-308
Bolivia	RI			
Costa Rica	<b>ID</b> letter - recurring significant reporting issues + recurrent overharvest of white marlin and swordfish	Receipt acknowledged		
Guyana	<b>ID</b> letter- recurring significant reporting issues and recurrent overharvest of white marlin			

**MINISTRY OF AGRICULTURE AND RURAL DEVELOPMENT**

Tirana, October 5, 2020

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

**SUBJECT: RESPONSE TO LETTER NO. 6465/20 ON COMPLIANCE ISSUES**

Dear Mr. Campbell,

On behalf of the CPC Albania, I am writing to response you about the late reporting Statistical data in 2019, noted at the 26<sup>th</sup> Regular meeting of ICCAT (18-26 November 2019, Palma de Mallorca, Spain) and mentioned in your letter No. 6465/20.

I do apologize for the late reporting by Albania the Statistical data in 2019. Actually, we sent the Statistical data on 23/08 and 26/08/2019.

We have taken all necessary measures to timely report to ICCAT in 2020 and ongoing, to avoid and eliminate any reporting and implementation deficiencies.

Please find attached the complete template, rectifying the deficiencies indicated.

CPC Albania is conscious of issues raised in your letter and we do not have any questions about.

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

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



Arian Palluqi

Head of Albanian Delegation

## COMPLIANCE LETTER RESPONSE TEMPLATE

<b>2019 Commission Meeting</b>			
<b>CPC: ALBANIA</b>			
<b>AREA OF DEFICIENCY</b>	<b>SPECIFIC ELEMENT IDENTIFIED BY COC</b>	<b>CPC REMEDIAL ACTIONS TAKEN OR PLANNED</b>	<b>DATE MISSING DATA/INFORMATION SENT (if applicable)</b>
Response to COC Chair letter from previous year: <b>replied</b>			
Annual Report			
Statistical data reporting	Statistical data reported late	Statistical data reported in time	Data sent on 23.08.2019 and 26.08.2019
Conservation and Management Measures			
Catch limits/quotas			
Other issues			



# الجمهورية الجزائرية الديمقراطية الشعبية

وزارة الصيد البحري

و المنتجات الصيدية

الأمين العام

الجزائري : .....

الرقم: ..... / و.ص.ب.م.ص.أ.ع/2020

Mr. Chair of the Compliance Committee to ICCAT

**Subject :** Clarifications to the Compliance Committee  
**REf :** Correspondence concerning compliance issues  
**Attach:** Response correspondence  
 Completed tables  
 Copy of the mail dated 29 July

Following your correspondence regarding the compliance issues, I have the honour to transmit herein the information on responses and clarifications to the issues raised by the Compliance Committee.

With regard to the statistical data which you have identified as having been submitted late, allow me to clarify that the data for Task 1 and Task 2 have been transmitted within the deadline established, i.e, 29 July 2019. Attached herein is the email which also specifies the request for review of an alternative method by the SCRS.

Furthermore, please find attached a completed form in response to the requested clarifications.

I take this opportunity to reiterate Mr. Chair of the Compliance Committee the assurances of my highest consideration.

**P/Secretary General**

## COMPLIANCE LETTER RESPONSE TEMPLATE

<b>2019 Commission Meeting</b>			
<b>CPC: ALGERIA</b>			
<b>AREA OF DEFICIENCY</b>	<b>SPECIFIC ELEMENT</b>	<b>REMEDIAL ACTION TAKEN</b>	<b>DATE MISSING DATA/INFORMATION SENT (if applicable)</b>
Response to COC Chair letter from previous year: <b>replied</b>			
Annual Report			
Statistical data reporting	Task 1 information for some species was not received (missing information shown in appendix 3 of COC-303).	Algeria will adopt the necessary measures to correctly fill out the statistical forms, in particular for null catches for Task 1 species. Zero was missing (ST03 form). Null catches confirmed.	Data sent 29 July 2019 and completed with 0 catches in our transmittal on 21 November 2019.
Conservation and Management Measures	Recs. 10-09 and 13-11: Unclear if ICCAT requirements to reduce bycatch to ensure safe handling of sea turtles have been implemented in a legally binding form.	In Algeria, ministerial circulars are legally binding. They are distributed nationally and implemented locally by Fisheries and fishery Resources Directorates, as well as by the National coastguard services who carries out the role of fisheries police.	The response was sent on 17/10/2019 and included in document COC-309/19 and confirmed in COC-308A/19.
	Rec. 11-10: Insufficient information on measures adopted to reduce bycatch and reduce discards in ICCAT fisheries.	Implementation of measures, however, as regards silky sharks, that indicates in waters under national jurisdiction, indeed, the national fleet operates and carries out its fishing activities exclusively in the waters under national jurisdiction.	

	Rec. 16-14: National Scientific Observer coverage has not been allocated.		
Catch limits/quotas			
Other issues			







BARBADOS



*Ministry of Maritime Affairs,  
And the Blue Economy*

FISHERIES DIVISION

Princess Alice Highway, Bridgetown, Barbados. 8811144  
*E-mail: Fisheries.Division@barbados.gov.bb*

Our ref. 101/13  
October 20, 2020

Tel.: (246) 535 5800

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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 820-06465**

I refer to your letter of 21 September 2020 in which a number of compliance issues were identified and I also note your requested response date of 20 October 2020, of which other competing commitments did not allow me to meet.

I would like to respond in a comprehensive manner and I therefore write to inform the Compliance Committee that the response will occur by 30 October 2020.

Please accept the assurances of my highest consideration.

Sincerely

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

Joyce Leslie (Mrs.)  
CHIEF FISHERIES OFFICER

**REF: HSFU-RFMO-V10-2020(49) Vol.1**

6 October 2020

Mr. Derek Campbell  
Chair of Compliance Committee  
ICCAT

**Subject: Letter on ICCAT Compliance Issues - 2019**

Dear Mr. Campbell,

Thank you for your letter dated September 21, 2020 regarding the subject matter.

The management of Belize's fisheries is stratified and falls under the jurisdiction of three separate competent authorities within the management framework of the Government of Belize. The Belize High Seas Fisheries Unit (BHSFU) has jurisdiction over fisheries in waters beyond national jurisdiction which represents 99% of Belize's interactions with ICCAT regulated species. The Coastal Zone Management Authority and Institute (CZMAI) has jurisdiction over sport and recreational fisheries which also interacts with ICCAT regulated species; and finally, the Belize Fisheries Department (BFD) has jurisdiction over all other fisheries within coastal and inland national waters which has no interactions with ICCAT regulated fisheries. While ICCAT conservation measures are applied to those fisheries falling under the jurisdiction of the BHSFU, this is not the case for the other two agencies. Recognizing this deficiency, the BHSFU is in dialogue with the CZMAI and we are in the final stages for establishing a Memorandum of Understanding which will facilitate the collection and sharing of data and expertise between two agencies. This will enable the BHSFU to report data on interactions with all ICCAT species, inclusive of those in our national waters.

Belize's national scientific observer programme is coordinated in accordance with ICCAT Rec. 16-14 which establishes minimum standards for fishing vessel scientific observer programs. Although the scheduled observer coverage for 2018 were not realized, Belize achieved 10% observer coverage in 2019 as reported to the Secretariat on 30 April 2020 and 9 July 2020.

Finally, the report for listing of a fishing vessel more than 45 days retroactively occurred as a result of an administrative oversight and the necessary safeguards have been implemented to prevent any reoccurrence.

Belize takes seriously its commitments undertaken to uphold and implement the ICCAT Convention and its various conservation and management measures; and it remains committed to the fulfilment of the Convention's objectives. This Administration hopes that these explanations suffices to allay the concerns of the Commission and will notify this body as soon as the current endeavor to rectify these deficiencies have been completed.

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

Sincerely,  
  
**Valarie Lanza**  
**Director of High Seas Fisheries**



cc: Raul Delgado, Commission Chair/Camille Jean Pierre Manel, Executive Secretary

COMPLIANCE LETTER RESPONSE TEMPLATE

<b>2019 Commission Meeting</b>			
<b>CPC: BELIZE</b>			
<b>AREA OF DEFICIENCY</b>	<b>SPECIFIC ELEMENT</b>	<b>REMEDIAL ACTION TAKEN</b>	<b>DATE MISSING DATA/INFORMATION SENT (if applicable)</b>
Response to COC Chair letter from previous year: <b>received</b>			
Annual Report	Unclear from Annual Report if Belize is implementing ICCAT requirements in a binding manner for vessels fishing in Belize's national waters.	Established MOU to facilitate inter-agency cooperation and collaboration for the collection, sharing and subsequent reporting of data to ICCAT	
Statistical data reporting	Rec. 16-14: not clear that minimum percentage for domestic observer coverage is being met.	10% observer coverage achieved in 2019 in fulfilment of min requirements established in Rec. 16-14	
	Some species in Task 1 not reported (blanks shown in COC-303 Appendix 3).	Zero catch confirmed	03/12/2019
Conservation and Management Measures	Rec. 13-13/14-10 Vessel reported for inclusion on ICCAT Record more than 45 days retroactively.	Administrative process for the reporting of authorized vessels have been amended to safeguard against future oversight.	
Catch limits/quotas			
Other issues			

**MINISTÉRIO DA EDUCAÇÃO  
UNIVERSIDADE FEDERAL RURAL DE PERNAMBUCO  
DEPARTAMENTO DE PESCA E AQUICULTURA**

Fábio Hissa Vieira Hazin  
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Derek Campbell  
Compliance Committee Chair  
cc: M. Delgado, Commission Chair

Recife, October 18th, 2020

Dear Derek,

We acknowledge receipt of your letter on compliance issues addressed to Brazil, dated September 21st, 2020. We are grateful to you for drawing our attention to the concerns listed in your letter, and we are pleased to provide you the following clarifications and justifications:

**Task II catch and effort data for billfish and sharks received late**

This is not in conformity with our records, which clearly show that we sent Task II data for billfish and sharks by July 17th, 2019, and, therefore, not late. In a check made on forms ST03-T2CE submitted by Brazil to ICCAT on that date, we confirmed that the data on catches of shark and billfish species made by the longline fishery were indeed included in the form, together with the catches of all other species.

**Rec. 16-14: Minimum observer % requirement not met**

Indeed. In 2018, the scientific observer coverage was below the 5% level required by ICCAT and we apologize for that. This happened because of the difficulties encountered in promoting the presence of observers on board small-scale fishing vessels, as well as because of the many transitions the Brazilian Government went through regarding the institution responsible for the management of the tuna fisheries, coupled with the worst recession in the history of the country. Notwithstanding, we are glad to inform that this situation already started to be rectified by November 2018, with a new research project financed by the Brazilian Government, which allowed a coverage of 6%, in 2019. The Brazilian Government, through ICMBio, has also just concluded a negotiation with Shellcatch to install Electronic Observing Systems, in 10 longliners, as a Pilot Project. Therefore, our coverage should increase significantly from now on.

**Rec. 18-05: Billfish Check Sheet received late**

Yes. It was an oversight from our side, for which we apologize. Notwithstanding, we would appreciate your consideration of the fact that this was a new form, while the number of forms required to be filled in by ICCAT has increased tremendously in the past years. So, the oversight of a new one among so many, although regrettable, is not surprising, particularly for developing states that do not have the same levels of resources, both financial and human, as the developed CPCs. This year, however, we believe ALL forms have been submitted in due time.

**Rec. 16-01: Some quarterly bigeye tuna catch reports received late**

Yes. The quarterly BET catch reports were submitted with 17 days delay, in July, and 3 days, in October. This happened because catches of bigeye tuna in the first and second quarters of 2019 (mainly for the fishing in associated school) was delivered late, resulting in a delay in the compilation and analysis of these data for submission to ICCAT within the appropriate deadlines. In this case too, we believe the special circumstances of an artisanal fisheries, made up by a fleet of small boats and various landing sites, should be taken into account. Notwithstanding, new management measures have already been taken by the Brazilian government to avoid this problem in the future, including the declaration of catches and other information on electronic forms (logsheets).

**Compliance reporting tables incomplete (no information on compliance with size limits)**

Yes. This was another oversight, which was, however, corrected in the forms submitted this year.

We sincerely hope to have provided all the clarifications and explanations that were requested and take this opportunity to thank you, again, for drawing our attention to these mishaps, while reiterating our firm commitment to fulfill all of our obligations to ICCAT.

Yours sincerely!

A handwritten signature in black ink, appearing to read 'Fábio H. V. Hazin', with a stylized flourish at the end.

Fábio H. V. Hazin  
DEPAq/UFRPE  
Professor Titular



F/GAFRD-G/16-05

# الهيئة العامة لتنمية الثروة السمكية

## GENERAL AUTHORITY FOR FISH RESOURCES DEVELOPMENT



جمهورية مصر العربية  
وزارة الزراعة واستصلاح الأراضي

Cairo 11/10/2020

Dear /Dr. Derek Campbell  
Compliance committee chair, ICCAT

In reference to your letter dated on 21st September 2020 concerning the completion of data for task 1 catches 2018 and the scientific national observer programme ST09. Please we would like to express the following views, to attach the required tables and indicating actions taken by Egypt:

- **The ST09** of the National observer programme ( Rec.16-14)

GAFRD has signed a national protocol with the National Institute for oceanography which includes providing training for national scientific staff in this field, but due to the outbreak of the COVID 19 epidemic and safety precautions procedures taken by the country we were not being able to organize these trainings . However, GAFRD is looking forward that early next year positively training sessions will start for national observers. In the meantime, GAFRD is highly willing to obtain National observers trainings and a financial assistance to overcome the problem of stopping of this programme due to the shortage of resources as this kind of trainings requires a huge budget to cover the required expenses to conduct training according to ICCAT standards. So, we are expecting to get any financial support whether through the ICCAT or any other concerned organization.



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Date :04/10/2020

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# الهيئة العامة لتنمية الثروة السمكية

## GENERAL AUTHORITY FOR FISH RESOURCES DEVELOPMENT



جمهورية مصر العربية  
وزارة الزراعة واستصلاح الأراضي

F/GAFRD-G/16-05

### - Task 1

Catches for 2018 (some species were not reported) this issue is completed as our attached table.

I hope that this letter clarifies our points of view and please accept the assurances of our highest considerations.

Chairman of GAFRD

Salah Eldin Mesalhy Aly

GAFRD  
General Authority  
for Fish Resources Development  
Ministry of Agriculture and Land Reclamation



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Date :04/10/2020

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## COMPLIANCE LETTER RESPONSE TEMPLATE

<b>2019 Commission Meeting</b>			
<b>CPC: EGYPT</b>			
<b>AREA OF DEFICIENCY</b>	<b>SPECIFIC ELEMENT</b>	<b>REMEDIAL ACTION TAKEN</b>	<b>DATE MISSING DATA/INFORMATION SENT (if applicable)</b>
Response to COC Chair letter from previous year: <b>replied</b>			
Annual Report			
Statistical data reporting	No national scientific observer programme data (ST09) received as required by Rec. 16-14.		A protocol was signed with the national institute for oceanography to provide training for national observers to start their work on board of the vessels ,but due to the outbreak of covid19 we couldn't implement the training.
	Some species in Task I not reported (blanks shown in COC 303 Appendix 3).	None to date – Egypt is prohibited from taking any ICCAT species other than bluefin tuna until missing information is sent (See ICCAT letter 091 of (8 January 2020)	Task 1 is attached on 2020/10/12
MCS Measures			
Catch limits/quotas			
Other issues			

MINISTRY  
OF AGRICULTURE AND LIVESTOCK

**CENTRE OF FISHERY AND AQUACULTURE DEVELOPMENT  
(CENDEPESCA)**

Ref: Salida ICCAT S20-06465 Letter of Identification of El Salvador  
under the Recommendation by ICCAT concerning trade measures (Rec. 06- 13)

Santa Tecla, 19 October 2020

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

Dear Mr. Campbell,

My delegation acknowledges receipt of your letter of 21 September 2020, whereby you inform of the alleged "Letter of Identification of El Salvador under the *Recommendation by ICCAT concerning Trade Measures* (Rec. 06-13)", to which a response must be given, providing specific clarifications which have been communicated to you, to the Commission Chair, and to the Secretariat in several prior communications and that are reasserted on this occasion.

Your letter is premature in that El Salvador does not recognize that the Commission proceedings and the COC Report, both for 2019, faithfully reflect what happened in the respective discussions, and at the present time, the reconciliation process is ongoing, during which we have felt it necessary to request the recordings, and a portion of these were made available to us by the Secretariat via the e-mail dated 16 October last. In addition, my delegation, in accordance with its communications, does not agree that El Salvador has been identified, on the basis of a specific and duly approved decision, consistent with the *Recommendation by ICCAT concerning trade measures* (Rec. 06-13).

My country recognises the importance of compliance issues and appreciates your efforts to ensure that the Commission is strengthened through effective compliance. My country therefore agrees with you that during the 2019 meeting of the Compliance Committee, conservation and management measures, as well as ICCAT reporting requirements were assessed for compliance. At that time, the circumstances were stated which unfortunately caused delayed submission in relation to several formal requirements of the Commission. My delegation undertook to resolve these and we believe that there is evidence of substantial improvement in the compliance processes related to reporting obligations, consistent with the provision contained in Paragraph 3 of Rule 13 of the ICCAT Rules of Procedure which states:

"3. There shall be a Conservation and Management Measures Compliance Committee on which every member country of the Commission may be represented. The Committee shall be broadly responsible for reviewing all aspects of compliance with ICCAT conservation and management measures, and shall develop and recommend to the Commission such measures as may be necessary to ensure the implementation of and compliance with ICCAT conservation and management measures. The Committee shall choose its own Chair."

The progress in compliance levels of my country, in light of the analyses and challenges that our developing countries have had to face, would not under any criterion warrant the determination referred to by the COC Chair in his communication.

In addition, it is correct that at the COC meeting, tables and documents within its responsibility were analysed, including COC-308 Appendix 2 d, and it was mentioned that - according to the interpretation of these documents - my country showed "substantial deficiency" in the implementation of the BET catch measure, i.e. Rec. 16-01 which indicates that "CPCs that are not developing coastal States shall endeavour

to maintain their annual catch less than 1575 t". Precisely during the meeting there was a conducive and productive exchange between my delegation and the other CPCs, and as a result my country undertook - effectively complying - to submit an explanation of the controversy before 31 January 2020, making it clear that the discussion did not conclude in 2019.

The document prepared by the COC Chair (COC-308 Appendix 2 d) contains a basic conceptual interpreting error, and paragraph 4, from where you have extracted your reference to 1,750 t, begins by stating that:

"The capacity limitation shall not apply to CPCs whose annual catch of bigeye tuna in the Convention area in 1999, as provided to the SCRS in 2000, is less than 2,100 t. However the following shall apply..."

Building on this basis, a special regime for those CPCs with annual catch levels less than 2,100 t, which is non discriminatory and implies the difference that effort would be different for developing coastal CPCs (3,500 t) and developing non-coastal CPCs (1,575 t), so that in the event that those limits are exceeded, a catch limit for the respective CPC should be established (agreed).

My country has undertaken efforts not to exceed its catch level, but they were not viable given that the Commission approved and maintained on the record four purse seiners that caught not only BET, but also yellowfin and skipjack, in a standard composition that has not been limited, nor was there a mandatory recommendation establishing a different rigour. The BET catch for 2018 of 2,634 t was in line with the regulation in force and therefore there is no basis for the measures to which you refer for identification for trade measures. As the guarantor of due process, the Chair of the Compliance Committee knows sufficiently well that a restrictive or punitive legal reaction is not permissible, if there is no duly prohibitive rule established in advance and a clear, express and specific decision for it, following an opportunity for defense.

Given that the claim and objection to the content of the proceedings are ongoing, I do not wish to divert your attention on this occasion, but it is wholly necessary to provide the clarifications referred to above.

Returning to your correspondence, El Salvador wishes to recognise how important it is that ICCAT requirements be satisfied, in a manner that does not undermine the Commission's work. Precisely because of that, and in light of the circumstances encountered by my Government on assuming the role the previous year, the Internal Committee on International Fishing was established for the purpose of reviewing, monitoring and ensuring compliance with the country's duties as regards regional fisheries management organisations and, as a special measure for 2020, an enhanced monitoring system was implemented to ensure that in 2020, the entire compliance system was working robustly and efficiently. As a result of this system, for this year, there was only a delay in submission of the annual report, for which, upon conclusion of the monitoring performed, an instruction was issued. At the present time, all relevant reporting requirements have been fulfilled.

My delegation appeals to the common need in ICCAT for full clarity in the decision-making processes and for the proceedings to reflect with absolute and unequivocal rigour what is decided, and full accuracy, because the objective of the Commission, as stated in the Convention and the applicable rules of International Law, is cooperation between States, taking into account that RFMOs are motivated by the interest to ensure the conservation and sustainable use of marine fishery resources within a broad, transparent, gradual, robust and non-discriminatory scheme of compliance with management measures that are adopted consistently, coherently and objectively to achieve management objectives. If the RFMOs do not follow this path they could endanger the necessary success of their mandate.

Please find attached the documents indicating the action taken by El Salvador to rectify the deficiencies recognised by my country.

Please accept the assurances of my highest consideration.

Engineer Norma Idalia Lobo Martel  
General Director

## COMPLIANCE LETTER RESPONSE TEMPLATE

2019 Commission Meeting			
CPC EL SALVADOR			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION UNDERTAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year: <b>Responded</b>		After sending the response to the COC Chair letter in October, and the meeting with the COC Chair in Palma de Mallorca and having undertaken compliance commitments, the Internal Fisheries Committee was established which is responsible for reviewing, monitoring and ensuring compliance with the country's tasks in relation to regional fisheries organisations. In addition, as a special measure for 2020, an enhanced monitoring system has been implemented to ensure that in 2020 the entire compliance system is working robustly and efficiently.	
Annual Report	Late submission of Annual Report.	Enhanced monitoring for compliance has been introduced.	The 2019 national report was submitted on 7 October 2020, after implementation of the monitoring process. It has been incorporated in the compliance programme that this report must be available and reviewed on 1 September each year, unless this provision is modified by ICCAT.
Statistical data reporting	Some Task II statistical data received after the deadline.	Enhanced monitoring for compliance has been introduced.	As stated in the national report, all Task II statistical data have been submitted.

<p>Conservation and management measures</p>	<p>Rec. 16-15: Transshipment report received late.</p> <p>Rec. 01-21 and 01-22: SDP data received late.</p> <p>Rec. 06-13: Trade data received late.</p> <p>Rec. 10-09/13-11: It is not clear whether the measures have been fully implemented/ are legally binding.</p> <p>Rec. 18-05 and 18-06: Billfish checksheet not received, update of shark checksheet not received.</p> <p>Rec. 16-01, paragraph 4 (a): "BET catch (2,634 t) indicates a significant deficiency in implementation of the measures for this fishery, in which, in accordance with Rec. 16-01 "CPCs that are not developing coastal States shall endeavour to maintain their annual catch less than 1575 t"</p>	<p>As to Rec. 16-15: Enhanced monitoring for compliance has been introduced.</p> <p>As to Rec. 01-21 and 01-22: Enhanced monitoring for compliance has been introduced.</p> <p>As to Rec. 10-09/13-11, as informed to the COC, all the measures adopted by ICCAT, through the provision of Art. 96 of the General Law on Fisheries Promotion and Aquaculture, are automatically binding and mandatory in El Salvador.</p> <p>As to Rec. 18-05 and 18-06, the billfish and shark checksheets were sent on 4 January 2020.</p> <p>As to Rec. 16-01 paragraph 4 (a): the very same paragraph 4 begins by stating that:          "The capacity limitation shall not apply to CPCs whose annual catch of bigeye tuna in the Convention area in 1999, as provided to the SCRS in 2000, is less than 2,100 t. However the following shall apply..."          Building on this basis, a special regime for those CPCs with annual catch levels less than 2,100 t, which is non discriminatory and implies the difference that effort would be different for developing coastal CPCs (3,500 t) and developing non-coastal CPCs (1,575 t), so that in the event that those limits are exceeded, a catch limit for the respective CPC should be established (agreed).</p>	<p>Billfish and shark sheets sent on 4 January 2020 according to the Official Communication CENDEPESCA 92.</p>
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## EL SALVADOR

		<p>My country has undertaken efforts not to exceed its catch level, but they were not viable given that the Commission approved and maintained on the record four purse seiners that caught not only BET, but also yellowfin and skipjack, in a standard composition that has not been limited, nor was there a mandatory recommendation establishing a different rigour. The BET catch for 2018 of 2,634 t was in line with the regulation in force.</p> <p>This regime totally changed in 2019, with Rec. 19-02, on the basis of which a bigeye catch limit of 1,553 t was established for El Salvador, which has been implemented through a national measure to control catches by vessel and internal monitoring mechanisms.</p>	
Catch limits / quotas	Compliance tables received late.	Enhanced monitoring for compliance has been introduced.	
Other issues			



**EUROPEAN COMMISSION**  
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

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

Brussels,  
MARE/D4/RC (2020)

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 #6465/20)**

Dear Dr. Campbell,

Thank you for your letter of 21 September 2020. The European Union has carefully considered the issues raised at the 2019 Annual Meeting regarding its performance. Please find attached our response to the compliance letter (circular #6465/20) informing 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 reaffirm the strong commitment of the European Union to ensure full compliance with the ICCAT measures.

Yours faithfully,

Anders C. JESSEN  
Head of Unit

## COMPLIANCE LETTER RESPONSE TEMPLATE

2019 Commission Meeting			
CPC: EU			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year: <b>received</b>			
Annual Report			
Statistical data reporting	Some statistical data received late:		
	<p><b>Fleet characteristics:</b> EU-Germany;</p> <p><b>Nominal catch:</b> EU-Germany, EU-Lithuania; some species EU-Spain; some species EU-Portugal.</p> <p><b>Catch &amp; Effort:</b> EU-Croatia and EU-Germany</p>	<p>Some EU Member States with infrequent by-catches of ICCAT species are not always familiar with the ICCAT requirements and this can generate delays in reporting. The EU emphasizes that these relate to minor quantities and have no impact on the work of the SCRS.</p> <p>Statistical data for EU.Germany and EU.Lithuania were late and received only after the deadline and several reminders.</p> <p>Statistical data for EU.Croatia was submitted to ICCAT on 16.07.2019 and thus not late. However, the catch and effort (C&amp;E) dataset was incomplete and the follow-up took longer than expected, so that final corrected data was received only on 13.09.2019 and submitted to ICCAT on 16.09.2019.</p> <p>We raise awareness with EU Member States on the importance of timely data submission but the exercise can be complex and in some cases – despite a timely submission – subsequent revisions might take too long. Reminders are being sent and some improvement in 2020 has been noticed.</p>	<p>EU.Germany (FC, NC, CE): 13.09.2019</p> <p>EU.Lithuania (NC): 12.09.2019</p> <p>EU.Spain (NC some species) 09.09.2019 (TAREA I)</p> <p>EU.Portugal (NC some species) 07.08.2019</p> <p>C&amp;E EU.Croatia: initial 16.07.2020; final 16.09.2020</p>
MCS Measures	Rec. 18-02: Some caging declarations received late.	Caging declarations: this is a problem for EU farm flag Member States which are involved with very large numbers of caging operations. The time necessary to analyse and validate the caging footages, as well as the time necessary to adapt the eBCD references in collaboration with the catching flags, EU Member States or other CPCs, explain the late transmission of the	



		<p>caging declarations and caging reports. Efforts have been made by the EU Member States concerned to hasten the process. Nevertheless note should also be taken of the requirement to submit a caging report within one week of the completion of the caging operation whereby a caging operation is not complete until a potential investigation and release are also completed. In this regard it is the EU's understanding that the 1 week timeframe starts following the necessary updates made to the eBCD as a result of investigations or releases.</p>	
	<p>EU-Portugal and EU-Greece BFT Other/Catching vessels over 15 m did not report any VMS messages</p>	<p>In 2019 EU.Portugal vessels were not sending VMS positions because none of these vessels were targeting BFT (only by-catch). Nevertheless, EU.Portugal is now sending VMS and the data are duly forwarded to the ICCAT Secretariat. In case of technical difficulties, we invite the ICCAT Secretariat to contact DG MARE's RFMO mailbox MARE-RFMO@ec.europa.eu.</p> <p>EU.Greece has issues to exchange VMS data in line with the current UN/FLUX standard within the EU. The technical services are in contact with them to solve the problem.</p>	
<p>Catch limits/quotas</p>	<p>Possible under-reporting of WHM on compliance tables</p>	<p>Two major data sources, meeting different constraints and objectives, are used for the production of catch data regarding the EU fishing activity:</p> <ul style="list-style-type: none"> <li>- the so-called 'regulatory' data, resulting from the application of EU and/or international fisheries control rules and therefore fed mainly by professional fishermen's catch declarations and validated by EU Member states authorities;</li> <li>- estimations based on sampling data from the application of scientific protocols. The estimation of marlin catches and discards is made based on data from the Information and Sampling Network of the Observer Programs. These data are used to decompose the group of unidentified billfish at the species level, calculating prevalence ratios between species taking into account space-temporal strata. As a space stratum they calculate the decomposition ratios with data from other trips in the same area, or they use larger areas. As a temporal stratum, they use the trip decomposition ratios from the same year, and if this is not possible, trips from previous years.</li> </ul> <p>Le latter category being estimations, the EU considers that the data to be taken into account for the application table are the so-called 'regulatory' data based on catch declarations and considered the official data.</p>	<p>Catches regarding WHM for the period 2015-2018 have been updated in the compliance table sent on 07 August 2020</p>

Other issues	COC seeks updated information on EU investigation concerning possible overharvest of Bluefin tuna discussed at the 2018 annual meeting.	<p>The EU is currently following the matter actively on two levels:</p> <p><u>EU level:</u> the EU Commission has conducted verification missions in all relevant Member States directly/indirectly involved in Tarantelo in 2018 and 2019. This has resulted in the launch of an infringement against Malta in May 2020. This is an ongoing procedure and therefore the EU is limited in terms of the details on the items under investigation. Further information may be found in the link <a href="https://ec.europa.eu/commission/presscorner/detail/EN/INF_20_859">https://ec.europa.eu/commission/presscorner/detail/EN/INF_20_859</a>. The EU re-affirms that it will not hesitate to take follow-up actions if the findings are confirmed during the infringement procedure.</p> <p>Member State level: following the Tarantelo Operation, Spain opened a case at the level of one of the highest Courts (Audiencia Nacional). Due to the complexity of the case, the judge has requested an extension of the instruction procedure. The prorogation act issued by the Spanish Courts is being annexed to this reply. This is an ongoing judicial procedure and therefore the EU is also restricted in terms of the disclosure of the details under investigation.</p>	
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**JUZGADO CENTRAL DE INSTRUCCION N° 003  
MADRID**

**C/ GARCIA GUTIERREZ, 1. PLANTA 3ª**

**Tfno: 917096522/4**

**Fax: 917096525**

**NIG: 28079 27 2 2018 0003027**

**GUB11**

**DILIGENCIAS PREVIAS PROC. ABREVIADO 0000091 /2018 N**

**AUTO**

En Madrid, a once de junio de dos mil veinte

**ANTECEDENTES DE HECHO**

**PRIMERO.-** El día 20 de marzo de 2019 se dictó auto por el que se declaraba la complejidad de la presente causa por un plazo de dieciocho meses.

**SEGUNDO.-** Por el Ministerio Fiscal, mediante escrito interesa la prórroga de la instrucción de la presente causa.

**FUNDAMENTOS JURÍDICOS**

**PRIMERO.-** El artículo 324.2 de la Ley de Enjuiciamiento Criminal dispone:

“Si la instrucción es declarada compleja el plazo de duración de la instrucción será de dieciocho meses, que el instructor de la causa podrá prorrogar por igual plazo o uno inferior a instancia del Ministerio Fiscal y previa audiencia de las partes. La solicitud de prórroga deberá presentarse por escrito, al menos, tres días antes de la expiración del plazo máximo.”

Igualmente, el art. 324.4 de la Ley de Enjuiciamiento Criminal señala:

“Excepcionalmente, antes del transcurso de los plazos establecidos en los apartados anteriores o, en su caso, de la prórroga que hubiera sido acordada, si así lo solicita el Ministerio Fiscal o alguna de las partes personadas, por concurrir razones que lo justifiquen, el instructor, previa audiencia de las demás partes, podrá fijar un nuevo plazo máximo para la finalización de la instrucción.”

Por último, la Disposición transitoria única de la Ley 41/2015, de 5 de octubre, de modificación de la Ley de Enjuiciamiento Criminal para la agilización de la justicia penal y el fortalecimiento de las garantías procesales, señala en su apartado 3 que “El artículo 324 se aplicará a los procedimientos que se hallen en tramitación a la entrada en vigor de esta ley. A tales efectos, se considerará el día de entrada en vigor (06/12/2015) como día inicial para el cómputo de los plazos máximos de instrucción que se fijan en la presente ley.

**SEGUNDO.-** En la presente causa concurren los presupuestos para declarar la prórroga de la complejidad de la causa, ya que nos encontramos ante un procedimiento inhibido por múltiples delitos, resultando una instrucción compleja, dado que el presente procedimiento se ha incoado por la existencia de un organización criminal, valorando que nos encontramos ante un supuesto de defraudaciones maquinaciones para alterar el precio de las cosas, y fraudes alimentarios que si bien tuvo uno de sus puntos de inicio en una nave del término de Beniparrel, lo cierto es que de inmediato se produjo la actuación en seis comunidades autónomas del territorio nacional por delitos : delito contra la fauna previsto en el art 335 del CP; delito contra el mercado y los consumidores de los arts 282 y siguientes; delito contra la salud pública del art 364 y siguientes de CP; falsedad en documento mercantil previsto en los arts. 390 y siguientes; delito continuado de estafa de los arts. 248, 249 Y 250.5; blanqueo de capitales del art 301 y organización criminal previsto en el art 570 bis.

**TERCERO.-** Estamos ante una causa complejísima, no solo en cuanto a su objeto, sino también en consideración al número de personas investigadas, la laboriosidad y complejidad de los informes



elaborados y que han de elaborarse. Todo ello ha llevado a invertir un dilatado periodo de tiempo en su tramitación, sin que en momento alguno se haya producido paralización ni dilación injustificada de la investigación. En consecuencia, procede acceder a la solicitud de prórroga interesada por el Ministerio Fiscal.

Vistos los preceptos legales citados y demás de pertinente aplicación.

#### **ACUERDO**

Declarar la prórroga de la complejidad de la instrucción de las presentes actuaciones, ampliando el plazo de la misma por DIECIOCHO MESES.

Notifíquese la presente resolución al Ministerio Fiscal, y demás partes personadas, significando que contra la presente resolución cabe interponer, en aplicación del art. 766 LECRim, recurso de reforma en el plazo de tres días y/o apelación en el plazo de cinco días que deberán interponer ante este Juzgado Central.

Así lo acuerdo y firmo, MARIA TARDON OLMOS, Magistrada-Jueza del Juzgado Central de Instrucción nº 003 de MADRID.

**DILIGENCIA.-** Seguidamente se cumple lo mandado, doy fe.

Government of Guatemala

MINISTRY OF AGRICULTURE, LIVESTOCK AND FOOD

Vice-minister of Agricultural Health and Regulations  
Directorate of Fisheries and Agriculture Normativity

Guatemala  
19 October 2020 Office

No.DIPESCA-DIREC-711-2020/lmfd

Sir  
Derek Campbell  
Chair of the Compliance Committee of ICCAT  
28002 Madrid, Spain

Dear Sir,

We would like to express warm greetings in the name of the Directorate of Fisheries and Agriculture Normativity. With reference to your correspondence #6465 dated 21 September 2020, requesting that Guatemala complete and transmit the template indicating the actions taken by Guatemala to rectify the deficiencies shown, please find attached the requested information.

Yours sincerely,

Reciba un cordial saludo en nombre de la Dirección de Normatividad de la Pesca y Acuicultura. El objeto

Lic. Julio César Lemus Godoy  
Director  
Directorate of Fisheries and Agriculture Normativity

COMPLIANCE LETTER RESPONSE TEMPLATE

2019 Commission Meeting			
CPC: GUATEMALA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year: <b>Replied</b>			
Annual Report	Annual Report received late	The preparation of the Annual Report requires revisions and contributions from different staff members as well as a final revision. Efforts have been made to streamline procedures and improvements have been made although it is recognized that more work needs to be done.	
Statistical data reporting	Scientific observer programme information received late (Rec. 16-14)	As regards the scientific observer programme, information had to be confirmed from shipowners. Communication channels with shipowners have improved.	
	Task 1 information for some species not reported on time (missing information is shown in appendix 3 of COC-303). Zeros were confirmed later.	There was an incorrect interpretation of the instructions regarding null values for Task 1.	
Conservation and Management Measures	Rec. 16-01: No quarterly bigeye catch reports received.	The duration of fishing operations and the availability of data continue to be a disadvantage for timely reporting.	
	FAD management plan received late.	Notification was provided that the document was been reviewed and updated. It was interpreted that there was no deadline to submit the management plan.	
	Rec. 18-05 and 18-06: Shark and billfish check sheets received late.	Internal mix-up with mails and dates on compliance and others had to be consulted as regards the interpretation of what was being requested in the Check Sheets. Efforts are being made so this is not repeated.	
	Letter regarding the reporting of information on sea turtle measures.	Information has been included in the Annual Reports complying with the implementation of measures regarding sea turtles.	
	Rec. 10-09 y 13-11: No está claro si los requisitos se han implementado de un modo legalmente vinculante	Guatemala has made efforts to fulfil its commitments and responsibilities in the Organizations to which it is party The issue on sea turtles is part of this and actions and mediations have been taken in different national fisheries to contribute to the protection of this species.	

		The implementation of protocols and actions has also been considered in the bluefin tuna fishery.	
Catch limits/quotas			
Other issues			



**REPUBLIC OF EQUATORIAL GUINEA  
MINISTRY OF FISHERIES AND WATER RESOURCES**

**ICCAT UNIT**

Malabo, 15 October 2020

No.  
Ref.  
Sect.

Mr. Derek Campbell,  
Chair of the Compliance Committee

Subject: Response to the letter on compliance issues

Mr. Chair,

Regarding your letter of 21 September last, on compliance related issues, following review of the 2019 Secretariat Report on Statistics and Coordination and the 2019 Report of the Secretariat to Compliance Committee, as well as other available information, in which the Committee observed the following deficiencies for Equatorial Guinea:

- Late submission of statistical data.
- Rec. 16-14: No information on observers programmes.
- Rec. 16-01: No quarterly bigeye tuna catch reports received.
- Compliance tables not submitted.
- Catches for 2018 reported despite the prohibition on catches under Rec. 11-15, because the Task I data required had not previously been reported.

In this regard, I would like to inform you, Mr. Chairman that we know that all ICCAT Contracting Parties and Cooperating non-Contracting Parties, Entities or Fishing Entities (CPCs) are under an obligation to comply with Commission requirements. Consequently, we would like to inform the Compliance Committee of the following:

- As to the first area of deficiency, (late submission of statistical data), when the Minister of Fisheries and Water Resources saw that unit did not respond efficiently she appointed a new team in early August 2019, which caused the delay in the submission of 201 statistics.
- As to the second area of deficiency, (lack of information on scientific observers programmes). There was effectively no scientific observers programme, which could not be developed due to the lack of technical capacity. However within the framework of the contract with the Senegalese tuna vessel owner, in April/May 2019, two technicians from the Ministry received, in Abidjan, Côte d'Ivoire, training as on board fishing vessel observers.

Consequently, and in order to fulfil our obligations under this heading in a timely and effective manner, we need technical assistance from ICCAT.

- As to the third and fourth areas of deficiency, (no quarterly bigeye tuna catch reports received and compliance tables not submitted), we apologise for this oversight. The forms had already been filled out (the compliance tables form as well as the quarterly bigeye catch form) but they were not sent on time to the Commission. When we became aware of the situation, they were sent on 30 September.
- As to the last area of deficiency, (catches for 2018 reported despite the prohibition on catches under Rec. 11-15 because the Task I data required had not previously been reported), we would like to inform the Chair of the Compliance Committee that the inefficiency of the former team that worked in the ICCAT Unit of this ministry, and the lack of fishing activity recorded for 2017 could partly explain why information from ICCAT was not circulated. When the new team was put in place it had to work quickly to comply with the Commission requirements for 2018, and

this caused late submission of the data for that year, and why we were not informed about the catch prohibition for 2018. We therefore apologised at the 26th Regular Meeting of ICCAT which was held from 18-26 November 2019 in Palma de Mallorca, Spain, on presenting the letter explaining the lack of statistics for 2017; which is why we could not submit the Task I data for that year.

On the basis of the foregoing, and thanks to the guidance, clarifications and messages exchanged with the Commission, we hereby declare once more zero (0) or nil catches for 2017.

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

Rubén Darío NSO EDO ABEGUE  
FOCAL POINT

## EQUATORIAL GUINEA

### COMPLIANCE LETTER RESPONSE TEMPLATE

<b>2019 Commission Meeting</b>			
<b>CPC: EQUATORIAL GUINEA</b>			
<b>AREA OF DEFICIENCY</b>	<b>SPECIFIC ELEMENT</b>	<b>REMEDIAL ACTION TAKEN</b>	<b>DATE MISSING DATA/INFORMATION SENT (if applicable)</b>
Response to COC Chair letter from previous year: <b>replied</b>			It was received during the meeting.
Annual Report			Transmitted 06/08/2019
Statistical data reporting	No information on scientific observer programme.		No scientific observer programme due to lack of technical training capacity, therefore, to provide a correct and timely response of our obligations we will require the assistance of ICCAT.
	Rec. 16-14: Statistical data received late.	The team that worked in ICCAT related issues has been restructured.	Apologised at the meeting held in Palma de Mallorca, Spain.
Conservation and Management Measures	Rec. 16-01: Quarterly bigeye catch reports for 2018 (or 2019) have not been received.	The team that worked in ICCAT related issues has been restructured. We regret this.	30/09/2020
	Catches for 2018 while Equatorial Guinea prohibited retaining ICCAT species in compliance with Rec. 11-15.		Due to the inefficiency of the previous team of this Ministry who worked in ICCAT related issues, and the lack of activity during 2017, could have hindered the correct flow of information received from ICCAT. Therefore, when the new team started, they had to start work immediately to comply with ICCAT Commission requirements for 2018 causing late reporting of data for this which included a lack of information on the prohibition of catches for 2018.

Catch limits/quotas	Compliance tables have not been received. GEN0003 requirements: Rec. 16-16 /18-07 [11-11]	The team that worked in ICCAT related issues has been restructured.	30/09/2020
Other issues	Prohibition of retaining ICCAT species maintained as Task 1 data is still missing for 2017. Response to the COC Chair's letter received during the meeting (correspondence received 17/11/2019).	The team that worked in ICCAT related issues has been restructured.	Officially notified at the 26 <sup>th</sup> Regular meeting of the Commission held 18-26 November 2019 in Palma de Mallorca, Spain. Task 1 data was not reported due to the lack of fishing activity in 2017.

**REPUBLIC OF GUINEA**  
Work-Justice-Solidarity

**MINISTRY OF FISHERIES, AQUACULTURE AND MARITIME ECONOMY**  
**NATIONAL DIRECTORATE OF MARITIME FISHERIES**

**N° 0167/MPAEM/DNPM/2020**

Conakry, 19/10/2020

**National Director**

**To**

**Mr. Derek Campbell**  
**Chair of the ICCAT Compliance Committee (COC)**

Madrid

*Subject: Response to the letter of identification of the Republic of Guinea under ICCAT Rec. 06-13 concerning trade measures*

Mr. Chairman,

I read with great concern your correspondence of 21 September 2020 regarding some reporting and implementation deficiencies, as well as the identification of the Republic of Guinea under ICCAT Rec. 06-13 concerning trade measures.

I would like to hereby call your attention to elements of responses that explain this situation.

The Ministry responsible for the fisheries in the Republic of Guinea prepares and implements annually a fisheries development and management plan (FDMP). It should be recalled that since 2015, there have not been any Guinean-flagged vessels targeting tuna and no Guinean vessel is registered for fishing tuna. Statistics on tuna are collected under the statistical category "large tunas" and "small tunas".

To remedy this situation and comply with ICCAT provisions, we had established a local team of managers and technicians to monitor the activities of the organization. This team has carried out a survey at the different landing sites of the artisanal fishery to identify the small tuna species landed on the coast. For this activity, some landing sites have been identified for monitoring landings of small tunas. As a result of this work, a monitoring system has been introduced at landing sites and some earlier data have been recovered.

To improve the performance of this monitoring system, we request support from the ICCAT Executive Secretariat to build the capacity of the new local team that has been established in order to participate better in ICCAT activities.

Considering the significance of this decision and given the impact of COVID-19 on the normal functioning of our administration, I appeal to your clemency to enable us to permanently solve these deficiencies.

I hope that the letter will command your attention, and please trust in my willingness to comply with my country's commitments in relation to our common organization.

cc. Mr. Delgado, Commission Chair

**Amara Camara KABA**  
**Head Delegate to ICCAT**

**COMPLIANCE LETTER RESPONSE TEMPLATE**

<b>2019 Commission Meeting</b>			
<b>CPC : GUINEA (REP.)</b>			
<b>AREA OF DEFICIENCY</b>	<b>SPECIFIC ELEMENT</b>	<b>REMEDIAL ACTION TAKEN</b>	<b>DATE MISSING DATA/INFORMATION SENT (if applicable)</b>
Response to COC Chair letter from previous year: no response.	<p>Since 2015, Guinea (Rep.) has not aligned vessels flying its flag directed at tuna. The catches taken are essentially small tunas that are landed at landing sites of the artisanal fishery with canoes.</p> <p>The lack of control of the activities engaged in by canoes has hampered information collection, which is due to the large number of landing sites and canoes.</p> <p>Since 2015. It should also be recalled that since 2000, a system to monitor catches in the artisanal and industrial fisheries has been implemented.</p>	<p>In light of the improvement in governance of the sector and compliance with ICCAT requirements, Guinea (Rep.) has initiated a canoe registration programme in the artisanal fishery.</p> <p>This process has resulted in registration of all fishing canoes and identification of landing sites..</p> <p>In addition, a team has been set up to enable our administration to comply adequately with its ICCAT obligations.</p>	
Annual Report	The annual report has not been received.	<p>The Ministry responsible for the fisheries in Guinea (Rep.) prepares and implements yearly a development and management plan for all fisheries.</p> <p>Catch statistics of the artisanal and industrial fisheries are collected through the monitoring system. The data available relate to bycatch of the artisanal and industrial fisheries. These bycatch are divided into two statistical categories: large tunas and small</p>	

		<p>tunas. Identification of these catches is limited to the statistical categories, and no other taxonomic or metric information is given, such as those recommended in the overdue ICCAT form.</p> <p>Since removal of the country from the red list in 2017, administrative and scientific reforms have been developed to improve governance of the sector.</p> <p>From a scientific point of view, a review of the collection system is expected taking into account new trends, in particular, the emergence of an artisanal fishery of small tunas in Guinea, as well as all the species monitored by ICCAT.</p> <p>To improve the performance of the fisheries management system, support is requested from ICCAT and its partners to train the national team in collection and transmission of information and compliance by Guinea with its ICCAT obligations.</p>	
<p>Statistical data reporting</p>	<p>No statistical data have been received.</p> <p>The existing statistical system only took into account catching vessels of the industrial fishery. However, to date, there are no industrial fishing boats flying the Guinean flag targeting tunas.</p>	<p>To remedy this deficiency, a new system has been implemented through identification of tuna species landed by the artisanal fishery.</p> <p>Through this system, catch data of the artisanal fishery have been recovered.</p>	

	<p>Rec. 16-14: No data / information on the observers programme (ST11 or ST09) received.</p>	<p>NB: See annex for annual evolution of tuna catches since 2014.</p> <p>Rec. 16-14: Since Guinea (Rep.) lacks Guinean-flagged vessels targeting tuna, it has not been able to develop an observer programme.</p> <p>However, for the other demersal and pelagic fisheries an onboard observer programme has been implemented.</p> <p>On this basis, observers are deployed for reporting statistics on the industrial fishery.</p>	
<p>Conservation and management measures</p>	<p>Rec. 16-01: No quarterly bigeye tuna catch report has been received.</p> <p>Rec. 18-05: The billfish check sheet has not been received.</p> <p>Rec. 18-06: The update of the shark measures implementation check sheet has not been submitted.</p>	<p>Rec. 16-01: There is no specific tuna management plan in the Republic of Guinea.</p> <p>Rec. 18-05: The new team in charge of monitoring ICCAT matters within our organisation will work to provide all data, including those related to the billfish control sheet.</p> <p>Rec. 18-06: According to the 2015 Maritime Fisheries Code and the 2020 annual fisheries development and management plan, the management measures applicable to the shark fishery (rays and sharks) prohibit capture, transportation, transshipment or landing of fins or carcasses separately.</p>	



	Rec. 12-07/18-09: No list of designated ports.	Rec. 12-07/18-09: To remedy this situation, a draft decree on designation of the port of Conarky has been prepared, as from signature	
Catch limits / quotas			
Other matters	No response to the letter of the COC Chair.		

Annex 1

1. Catch taken by vessels of the industrial fishery - all licenses

Table 1. Annual evolution of catches (in kilograms) by tuna species

Year	Small tuna			Large tuna	Total
	<i>Scomberomorus tritor</i> (West African Spanish mackerel)	<i>Orcynopsys unicolor</i> (plain bonito)	<i>Scomber japonicus</i>	<i>Thunnus obesus</i>	
2015	24 244.3	75 763.5	1 010.2	3 214.0	<b>104 232.0</b>
2016	6 422.2	20 069.3	267.6	11 336.0	<b>38 095.0</b>
2017	20 668.3	101 913.5	1 036.2	68 949.0	<b>192 567.0</b>
2018	50 036.2	573 863.3	1 251.5	61 978.0	<b>687 129.0</b>
2019	50 132.8	177 490.0	2 097.2	52 434.0	<b>282 154.0</b>

In the industrial fishery, the species *Orcynopsys unicolor* (plain bonito) is the most dominant in the total catches, followed by bigeye tuna (large tuna) and West African Spanish mackerel (*Scomberomorus tritor*).

2. Small tuna catches taken by the maritime artisanal fishery - all licenses

In the maritime artisanal fishery, the species *Scomberomorus tritor* (West African Spanish mackerel) ranks first, followed by *Orcynopsys unicolor* (plain bonito) and chub mackerel *Scomber japonicus*.

Year	<i>Scomberomorus tritor</i> (West African Spanish mackerel)	<i>Orcynopsys unicolor</i> (plain bonito)	<i>Scomber japonicus</i>	Total
2015	9 238.8	348.7	36.2	<b>9 623.7</b>
2016	10 892.9	390.4	63.5	<b>11 346.7</b>
2017	93 407.6	625.2	141.7	<b>94 174.6</b>
2018	88 145.5	460.8	86.9	<b>88 693.3</b>
2019	95 541.8	791.9	64.0	<b>96 397.7</b>

**MEXICO**

**AGRICULTURE CONAPESCA**

**General Directorate of Planning,  
Programming and Assessment**

Office No. DGPPE.-05512/180920

Mazatlán, Sinaloa, 16 October 2020

**"2020, Leona Vicario Year, Praiseworthy Mother Country"**

**DR. CAMILLE JEAN PIERR E MANEL  
ICCAT EXECUTIVE SECRETARY  
PRESENT**

Further to your correspondence S20-06465 dated 21 September 2020, regarding Letter on Reporting Issues detected by the Compliance Committee in 2019.

As regards this, allow me to transmit through info@iccat.int, the compliance letter response template corresponding to our country, duly completed and which includes the actions taken by the Government of Mexico to solve these issues.

Please accept the assurances of our highest considerations.

Yours sincerely,

**GENERAL DIRECTORATE OF PLANNING, PROGRAMMING AND ASSESSMENT**

**E PLANEACIÓN, PROGRAM**



**BERNARDINO JESÚS MUÑOZ RESENDEZ**

C.c.e.p. ENG. RAÚL DE JESÚS ELENES ANGULO. – NATIONAL COMMISSIONER OF  
AGRICULTURE AND FISHERIES  
raul.elenes@conapesca.gob.mx

BJMR/ ICRR/GXLR/ BASB"

COMPLIANCE LETTER RESPONSE TEMPLATE

2019 Commission Meeting			
CPC: MEXICO			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year: <b>replied</b>			
Annual Report	Rec. 18-13 : BCD report received late.	To avoid these types of situations, work is coordinated nationally among the various authorities that validate bluefin tuna catch documents in accordance with Rec. 18-13. These are issued through Fisheries Sub-delegations with state representation, in accordance with the nationally established procedures and these are transmitted to the Secretariat.	
Statistical data reporting	Rec. 16-14: ST11/ST09 information of scientific observer programmes received late.	The Mexican Government has overcome these issues, and in the future will report the information in time and in due form. The Mexican authorities reiterate the work of the Secretariat when meeting with the objectives and proposals of the Convention in favor of responsible and sustainable fishing.	
	Some information on Task 1 has not been transmitted (the missing information is included in Appendix 3 of COC-303). Confirmation of null catches received late.		
Conservation and Management Measures	Rec. 16-01: Bigeye catch reports for the last two quarters of 2018 received late.	Mexico reiterates its commitment to comply with the requirements of the Recommendation regarding the reporting of bigeye catch reports. In this regard, the necessary actions were taken to update the information, which was provided complete in compliance with	

		internal procedures.	
	Rec. 13-13: Some vessels on ICCAT Record missing IMO numbers.	As regards identification of Mexican vessels in the ICCAT Record without IMO No., the list is included with the updated date and all the registered vessels have their own IMO No. This information can be verified in the Secretariat's records.	
	Recs. 18-05 and 18-06: Billfish and shark check sheets received late.	To solve this issue, the Mexican Government has implemented the pertinent measures within the technical areas that provide this information.	
Catch limits/quotas			
Other issues			

COMPLIANCE LETTER RESPONSE TEMPLATE

2019 Commission Meeting			
CPC: NAMIBIA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year: <b>did not reply</b>			
Annual Report			
Statistical data reporting	<b>Rec. 16-14.</b> Information on scientific observer programs received late.		This year it was sent on 15 September 2020
	Some species in Task I not reported (blanks shown in COC 303 Appendix 3).		Was submitted at the 2019 annual meeting
Conservation and Management Measures	<b>Rec. 13-13/14-10:</b> Two vessels reported for inclusion on ICCAT Record more than 45 days retroactively.		
	<b>Rec. 16-15:</b> Report on transshipment received late.		This year it was sent on 15 September 2020
Catch limits/quotas	Overharvest of BUM for 3 years in a row (LL of 10 t; reported landings 32 (2016), 57 (2017), 84 (2018))	Vessels Captains were instructed to reduce catches of BUM to under 10 mt. Some vessels use Monofilament lines. Namibian Domestic laws prohibit discarding of any commercial species at sea. A total catch of blue marlin landed was included on the nominal catches (Task 1) sent on 31/07/2020. No white marlin was caught in 2019.	
Other issues		Due to Change in management this letter was not received by the relevant departments	
	No response to letter from COC Chair		

Managua 14 October 2020  
PE/EJA/288/10/2020

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

Dear Mr. Campbell,

We extend our greetings to you.

In connection with your communication of 21 September last, with ICCAT exit reference S20-06465, we are sending to you the report of our considered response to the Commission's observations on Nicaragua's 2017 and 2018 compliance reports, as stated in the communications of 18 September 2019 and 21 September of this year. We would also like to indicate that this Delegation undertakes to submit its reports by the deadlines established by the Commission.

***As to the observations on Nicaragua's 2017 compliance report, we inform you of the following:***

***1. Rec. 17-08: On submission of northern shortfin mako catch data***

The Republic of Nicaragua has not yet carried out positive fishing activity in the ICCAT area, since it does not yet have any national or chartered fishing fleets. Therefore, we do not yet generate any data on any species associated with the tuna fishery. However the country complies with the requirement to provide data on zero catches and fishing inactivity.

In the coastal waters of Nicaragua's EEZ the presence of the shortfin mako species has not been reported.

Nicaragua's traditional fisheries comprise crustacean species such as coastal shrimp (*Litopenaeus duorarum*, *Litopenaeus schmitti*, *Litopenaeus aztecus*) and are mainly caught by industrial vessels with lengths from 15.1 to 26 metres, and to a lesser extent, by artisanal vessels less than 15 metres in length. The industrial and artisanal fisheries target Caribbean spiny lobster (*Panulirus argus*), molluscs such as queen conch (*Strombus* or *Lobatus gigas*), and sea cucumbers (Holothuroidea Spp), as well as some scaly species such as snapper (*Lutjanus* Spp.) and grouper (*Epinephelus* Spp.). These fisheries are not listed by the International Commission for the Conservation of Atlantic Tunas (ICCAT), and therefore these data do not need to be reported.

Through fishery inspectors who are located directly in the storage centres and in processing plants, Nicaragua connects statistical information on shark bycatch that is taken in our coastal waters. The information is obtained by species group, based on its common name. The central statistics office processes the information on a monthly and yearly basis, depending on origin and this is published in the INPESCA fisheries and aquaculture yearbooks.

***2. Rec. 10-09. On bycatch of sea turtles in ICCAT fisheries***

Not applicable because Nicaragua does not yet have a fleet participating in ICCAT fisheries.

Nicaragua, as a member of the Central American Fisheries and Aquaculture Sector (OSPESCA), complies with all the provisions issued by this organization, those that are based on the code of conduct for responsible fishing, and in accordance with sea turtle conservation.

For identification of shark, seabirds, sea turtles and sea mammals, Nicaragua uses different identification guides, mainly the FAO guides published on its website.

**3. Rec. 16-03: On compliance with binding internal measures for implementation of shark requirements**

Nicaragua, as a member of the Central American Fisheries and Aquaculture Sector (OSPESCA), complies with all the provisions issued by this organization, those that are based on the code of conduct for responsible fishing, and in accordance with sea turtle conservation.

Through fishery inspectors who are located directly in the storage centres and in processing plants, Nicaragua collects statistical information on shark bycatch. The information is obtained by species groups, based on common name. The central statistics office processes the information on a monthly and yearly basis, depending on origin, and this is published in the INPESCA fisheries and aquaculture yearbooks.

**4. Rec. 12-17: On submission of the list of designated ports**

Not applicable because the Republic of Nicaragua has not yet carried out positive fishing activity of ICCAT species in the ICCAT area, and it does not yet have national or chartered fishing fleets. In addition, in Nicaragua, there are no processing plants of ICCAT species, and therefore there are no vessels flying international flags that land ICCAT species at ports in Nicaragua. Therefore we do not generate data on activities related to fleet movement or use of ports. The country does not have any designated ports for the entry of foreign fishing vessels.

***As to the observations on Nicaragua's 2018 compliance report, we inform you of the following:***

**1. Rec. 18-05: On submission of the billfish checksheet**

Not applicable since Nicaragua does not yet have a billfish (marlin/wahoo) fishing fleet operating in the ICCAT area. However, the artisanal fishery targeting snapper and grouper species operates in coastal waters of Nicaragua's Caribbean Sea, and some pelagic species are taken as bycatch. The landing statistics on these species are collected by fishery inspectors directly in the storage centres and processing plants. The information on pelagics is not classified at the species level, and in the statistical databases these are reported in the other species group.

The central statistics office processes the information on a monthly and annual basis, based on origin and this is published in the INPESCA fishery and aquaculture yearbooks.

**2. Rec. 18-06: On submission of the shark checksheet**

Not applicable, Nicaragua does not yet have a tuna fishing fleet operating in the ICCAT area, or vessels targeting shark. However, the artisanal fishery targeting snapper and grouper species in coastal waters of the Caribbean Sea take some shark species as bycatch.

Statistical information on shark bycatch taken by the artisanal fishery is collected by fishery inspectors directly in storage centres and processing plants. Information is obtained by species groups, based on common name. The central statistics office processes information on a monthly and yearly basis, depending on origin, and this is published in the INPESCA fishery and aquaculture yearbooks.

Nicaragua, as a member of the Central American Fisheries and Aquaculture Sector (OSPESCA), complies with all the provisions issued by this organization for proper shark handling, which are based on the Code of Conduct for Responsible Fishing and the 2011 Regional Action Plan for Shark Management and Conservation in Central America (PAR-TIBURÓN).

I appreciate your attention in this matter, and I take this opportunity to express to you our most sincere consideration and respect.

Yours sincerely,

**Edward Jackson Abella**  
Executive Chair

Cc.- Archive.-

# FEDERAL MINISTRY OF AGRICULTURE AND RURAL DEVELOPMENT

DEPARTMENT OF FISHERIES & AQUACULTURE  
AREA 11, GARKI - ABUJA

FDF/ICCAT/C/122

P.M.B 135. Garki - Abuja  
E-mail: fdfishabj@yahoo.com



Ref: No: \_\_\_\_\_  
October 19, 2020  
Date: \_\_\_\_\_

The Secretary General,  
ICCAT,  
Corazon de Maria,  
Madrid- Spain.

ATTENTION: Compliance Committee Chair.

**RE: LETTER ON COMPLIANCE ISSUES.**

I wish to acknowledge the receipt of the commission's letter on compliance issues as it involves Nigeria and to reply thus:

- i. We have already submitted our detailed annual report as requested in this notification, Please see report sent by the desk officer 22nd Sept. 2020
- ii. On the status of port entry by foreign vessels, we wish to inform that Nigeria has no designated port for the landings of species of interest to ICCAT. Species that are presently landed in the different ports in Nigeria are of no interest to ICCAT.

2 Thank you and please accept the assurances of the warm regards of the Honourable Minister of Agriculture.

  
Ibrahim Abubakar,  
Head Delegate



COMPLIANCE LETTER RESPONSE TEMPLATE

2019 Commission Meeting			
CPC: NIGERIA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year: <b>Received</b>			
Annual Report	Annual report incomplete (summary and reporting tables sent).	Detailed annual report already sent.	22 <sup>nd</sup> September 2020
Statistical data reporting			
Conservation and Management Measures	Rec. 18-09: Status of Port entry by foreign vessels unclear no designated ports submitted.	Nigeria has no designated port for the landings of ICCAT species however we have ports were species that are not of interest to ICCAT are landed.	
Catch limits/quotas			
Other issues			

COMPLIANCE LETTER RESPONSE TEMPLATE

<b>2019 Commission Meeting</b>			
<b>CPC: RUSSIA</b>			
<b>AREA OF DEFICIENCY</b>	<b>SPECIFIC ELEMENT</b>	<b>REMEDIAL ACTION TAKEN</b>	<b>DATE MISSING DATA/INFORMATION SENT (if applicable)</b>
Response to COC Chair letter from previous year: <b>Replied</b>			
Annual Report			
Statistical data reporting	ST09 received late.	In order to exclude technical failures, additional control over the sent information is organized	16/10/2019
Conservation and Management Measures	Rec. 18-05 and 18-06: No billfish check sheet received; updated shark check sheet received.	Billfish check sheet and updated shark check sheet were sent 15/10/2020 In order to exclude technical failures, additional control over the sent information is organized	15/10/2020
Catch limits/quotas			
Other issues			



## GOVERNMENT OF ST. VINCENT AND THE GRENADINES

RICHMOND HILL

KINGSTOWN

VC0120

*St. Vincent and the Grenadines*

Ref: AFFRTIL/

14<sup>th</sup> October, 2020**MINISTRY OF AGRICULTURE, FORESTRY, FISHERIES  
RURAL TRANSFORMATION, INDUSTRY AND LABOUR**

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

**Subject: Response to letter No. S20-06465 Regarding Compliance Issues**

Dear Mr. Campbell,

On behalf of the Government of Saint Vincent and the Grenadines, the Ministry of Fisheries comments made in the letter of Compliance Issues, which was sent on the 21<sup>st</sup> September, 2020 in which concerns of the Compliance Committee were outlined at the 26<sup>th</sup> Regular meeting of ICCAT (18 – 26 November 2019, Palma de Mallorca, Spain). Saint Vincent and the Grenadines duly notes the deficiencies outlined and wishes to express its commitment in fulfilling all responsibilities as a member of the International Commission for the Conservation of Atlantic Tunas (ICCAT).

Please note that every attempt is made on an annual basis to satisfy reporting obligations in a timely manner, although regrettable delays do occur. Thus, the late submissions of the NSW Management Plan, the Shark Check Sheet, the Tropical Tuna Management Plan, the Transshipment report and some quarterly BET tuna catches for the 2018 fishing year.

Saint Vincent and the Grenadines was at that time, and remains in its early stages of developing its domestic observer programme, and thus was not yet in a position to report on the scientific observer programme data (ST09 form). Administrative oversights also resulted in the provision of insufficient responses to the Recs: 16 -11 and 15- 05, and it should be noted that these deficiencies have been remedied in submissions for the 2019 and 2020 reporting year.

Please also note that Saint Vincent and the Grenadines was at the time, in the process of amending its domestic legislation with regard to the implementation of shark requirements. As has been reported this year, that legislation "Fisheries (Amendment) Regulations 2019" has been acceded and this Saint Vincent and the Grenadines continues to make strides in the sustainable management of sharks and related species.

The Ministry, and by extension the Government of Saint Vincent and the Grenadines would like to express its firm commitment to addressing the concerns raised by Compliance Committee regarding the submission of data to the ICCAT Secretariat.

Please accept the Government of Saint Vincent and the Grenadines assurances of the highest consideration.

.....  
Raymond Ryan (Mr.)  
Permanent Secretary  
Ministry of Agriculture, Forestry, Fisheries  
Rural Transformation, Industry and Labour

COMPLIANCE LETTER RESPONSE TEMPLATE

<b>2019 Commission Meeting</b>			
<b>CPC: St VINCENT&amp;THE GRENADINES</b>			
<b>AREA OF DEFICIENCY</b>	<b>SPECIFIC ELEMENT</b>	<b>REMEDIAL ACTION TAKEN</b>	<b>DATE MISSING DATA/INFORMATION SENT (if applicable)</b>
Response to COC Chair letter from previous year: <b>No reply received</b>			
Annual Report			
Statistical data reporting	No ST09 received.		
	Some species in Task 1 not reported (blanks shown in COC-303 Appendix 3). Zero catch later confirmed		09/12/2019
Conservation and Management Measures	Rec. 18-06: No updated shark check sheet received.		15/10/2020
Catch limits/quotas	Size limit sheet of compliance table not completed.		24/11/2019
Other issues			

COMPLIANCE LETTER RESPONSE TEMPLATE

<b>2019 Commission Meeting</b>			
<b>CPC: SENEGAL</b>			
<b>AREA OF DEFICIENCY</b>	<b>SPECIFIC ELEMENT</b>	<b>REMEDIAL ACTION TAKEN</b>	<b>DATE MISSING DATA/INFORMATION SENT (if applicable)</b>
Response to COC Chair letter from previous year: <b>replied</b>			
Annual Report	Annual Report received late		Annual Report (scientific part + Annex 1 transmitted 21/09/2018
Statistical data reporting			
Conservation and Management Measures	Rec. 16-14: ST11/ST09 (data/information of scientific observer programme not received		No scientific observer programme
	Rec. 02-21 and Rec. 02-22 amended by Rec. 18-07: Late submission of biannual SDP reports (BET and SWO, respectively).	Problems with our statistical document database	Ongoing resolution of problems
Catch limits/quotas	Rec. 13-13: A vessel with no IMO No. was reported at the end of its registration in the ICCAT record of vessels.		Missing IMO numbers included in the CPO1 form and transmitted to the Secretariat by email on 5 July 2018.
Other issues	The compliance tables sheet on size information was received late and is incomplete.		Corrections transmitted to ICCAT on 14/10/2019

Dear Sir,

Referring to your mail dated 21<sup>st</sup> September 2020 regarding deficiencies for Syria in certain statistical data, we would like to clarify the following:

- Only one Syrian vessel conduct BFT fishing activities each year to catch Syrian allocated quota, the total quota transfers for farming purpose in accordance with ICCAT recommendations ,the data and information recorded by the national observer correspond to the data reported by regional observer (number of fish, average weight, location ....). We confirm that all information and data collected by national observer will be reported to ICCAT Secretariat every year.
- Total Syrian quota of BFT transfers for farming purpose every year. The deficiency regarding of BCD annual report is due to technical default, we confirm that BCD annual report will be sent every year.
- Syrian vessels not targeting billfish and no catch or landing of billfish in previous years in Syria, therefore billfish check sheet is not applicable.
- Syrian vessel conducts BFT fishing activities during authorized period recommended by ICCAT from 15 May to 1st July every year, the list of designated ports refer to BFT only as Syria allocated with BFT quota only and no quota or catch from other ICCAT species. Syria designated port of Lattakia for landing and transshipment of BFT catch. Due to illegal sanction since 2011 the infrastructure of local fishing port in Lattakia is not developed to receive big vessels (water depth, technical officers, transportation.....). we confirm that foreign vessels can enter the commercial port of Lattakia during BFT fishing season. Because there are different authorities controlling activities of the commercial port (Directorate of ports, Customs Directorate) the port authority should be informed before entering in accordance with ICCAT recommendations so arrangements can be made at the time.

Please accept the assurances of my highest consideration.

## COMPLIANCE LETTER RESPONSE TEMPLATE

<b>2019 Commission Meeting</b>			
<b>CPC: SYRIA</b>			
<b>AREA OF DEFICIENCY</b>	<b>SPECIFIC ELEMENT</b>	<b>REMEDIAL ACTION TAKEN</b>	<b>DATE MISSING DATA/INFORMATION SENT (if applicable)</b>
Response to COC Chair letter from previous year: <b>Replied</b>			
Annual Report	BCD annual report not received	Total Syrian quota of BFT transfers for farming purpose every year. The deficiency regarding of BCD annual report is due to technical default, we confirm that BCD annual report will be sent every year.	
Statistical data reporting	No ST11/ST09 scientific observer programme information or data (Rec. 16-14)	Only one Syrian vessel conduct BFT fishing activities each year, the total quota transfers for farming purpose , the information recorded by the national observer correspond to the data reported by regional observer (number of fish, average weight, location .... ). We confirm that all information collected by national observer will be reported to ICCAT Secretariat every year.	
Conservation and Management Measures	No billfish check sheet received. (Rec. 18-05) Rec. 18-09: List of port sent on date indicated in Annual Report refers only to BFT, but see response to Chair's letter in COC-309. (COC-308 Ann.2: to seek clarification on designated ports for foreign flag vessels with species other than bluefin tuna Rec. 18-09).	Syrian vessels not targeting billfish and no catch of billfish in previous years, therefore billfish check sheet is not applicable. Syria designated port of Lattakia for landing and transshipment of BFT catch. we confirm that foreign vessels can enter the commercial port of Lattakia during BFT fishing season. the port authority should be informed before entering in accordance with ICCAT recommendations so arrangements can be made at the time.	
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*

19 October 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 21 September 2020 which seeks a reply from Trinidad and Tobago on the following compliance deficiencies noted by the Compliance Committee:

- Rec. 16-14: Domestic scientific observer program not yet implemented and hence no observer data received
- Rec. 18-09: No list of designated ports or port inspection reports received

In this regard, please find attached the completed template indicating the remedial action and date on which missing data or information was sent in relation to each of the identified deficiencies.

Trinidad and Tobago continues to receive assistance from the Food and Agriculture Organization of the United Nations, to improve its data collection and management systems for improved reporting as mentioned in previous communications to the Commission. We also reiterate to the Compliance Committee, our commitment to improving our conservation and management regime and implementation of measures. We are therefore pleased to report that our Draft Fisheries Management Bill was laid in Parliament in August 2020 and that the country acceded to the Port State Measures Agreement and accepted the Compliance Agreement in October 2019.

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

Yours sincerely

\_\_\_\_\_  
 Director of Fisheries  
 TRINIDAD AND TOBAGO Head Delegate



**COMPLIANCE LETTER RESPONSE TEMPLATE**

<b>2019 Commission Meeting</b>			
<b>CPC: TRINIDAD &amp; TOBAGO</b>			
<b>AREA OF DEFICIENCY</b>	<b>SPECIFIC ELEMENT</b>	<b>REMEDIAL ACTION TAKEN</b>	<b>DATE MISSING DATA/INFORMATION SENT (if applicable)</b>
Response to COC Chair letter from previous year: <b>Replied</b>			
Annual Report			
Statistical data reporting	Rec. 16-14: No. ST11/ST09 - observer information or data.	Trinidad and Tobago, to date, is still without the legal and resource capacities to implement a scientific observer programme. Progress has been made, however, with regard to the advancement of the Draft Fisheries Management Bill, which was laid in Parliament in August 2020 and is currently being reviewed by a Parliamentary Joint Select Committee. It should be noted that Regulations to facilitate implementation of the registration and licensing system, and monitoring, control and surveillance are currently being developed.	
	Some species in Task 1 not reported (blanks shown in COC-303 Appendix 3)	All species that were landed by TTO fishing vessels were reported; however in error, zeros were not entered in the ST02B sheet of the Task I report. This was rectified with the assistance of the Secretariat.	11 December 2019

<p>Conservation and Management Measures</p>	<p>Rec. 18-09: No list of designated ports.</p>	<p>Trinidad and Tobago acceded to the Port State Measures Agreement and accepted the Compliance Agreement in October 2019, and a Memorandum of Understanding among the agencies with responsibilities linked to fisheries management, including relevant trade, came into effect in August 2019. This mechanism will serve to improve national capacity to conduct the requisite inspections at port.</p>	<p>The list of authorised ports will be submitted following receipt of the final report of the port assessment.</p> <p>It is anticipated that port inspection reports will be submitted subsequent to implementation of the training component of the Port State Measures Support project.</p>
		<p>In preparation for implementation of the Port State Measures Agreement and the Compliance Agreement, Trinidad and Tobago is participating in the 3-year Port State Measures Support Project, GCP/RLA/222/USA, under which an assessment of Trinidad and Tobago's ports for compliance with the Agreement on Port State Measures was conducted in August 2019 and training for port inspectors from all relevant agencies under the MOU was scheduled for the first quarter of 2020.</p> <p>Unfortunately, due to the COVID-19 pandemic, the final report on the assessment has not yet been submitted and the training for port inspectors was delayed</p>	

		until the end of October to the beginning of November 2020.	
Catch limits/quotas	BUM and WHM adjusted landings limit still negative, but T&T notes actions that have been taken; zero catch in 2017-2018.		
Other issues			



Foreign, Commonwealth  
& Development Office

Polar Regions Department  
Overseas Territories  
Directorate  
Foreign, Commonwealth and  
Development Office  
King Charles Street  
London SW1A 2AH

[www.gov.uk/fcdo](http://www.gov.uk/fcdo)

ICCAT  
Corazón de María, 8 – 28002  
Madrid  
Spain

19 October 2020

### UKOT LETTER ON COMPLIANCE ISSUES

Dear Mr Campbell,

I am writing in response to your letter of the 21<sup>st</sup> September 2020 (Ref. S20-06465), regarding the UKOT reporting and implementation deficiencies noted by the Commission at the 26th Regular meeting of ICCAT.

I provide the actions taken to rectify these deficiencies and indicate the further improvements made to comply with ICCAT measures as follows:

#### **Rec. 18-13: BCD Annual Report received late**

The BCD annual report was submitted at the Compliance Committee meeting. A small amount of bluefin tuna are caught as bycatch in Bermuda, and domestically traded tuna are accompanied by a validated BCD, verified by an authorised government official. No bluefin tuna is imported into or exported or re-exported from Bermuda.

#### **Rec. 16-14: No domestic scientific observer programme in place and hence no observer data received**

Establishment of an observer programme for the UK Overseas Territories remains challenging due to capacity issues in the UKOTs and the nature of the fleets, which are composed of small-scale vessels predominantly under 15 m total length with limited space onboard to carry observers. However, the UK Government is providing investment for UKOTs via a multi-year Blue Belt Programme that supports development of sustainable fishery practices. As part of this initiative, action is underway to improve compliance with ICCAT measures as follows:

The St Helena Marine Section collects data from a single landing point, submitting all length and weight information via Task I & II data. Investment in additional human resources at St Helena has increased staff capacity, employing a Fisheries Officer and an Enforcement Officer that facilitate meeting ICCAT requirements.

Through this investment, it has been possible to conduct fisheries research at St Helena in 2018/19 that has contributed to 69 days tuna tagging conducted under commercial fishing conditions. Whilst this is not an observer programme, the data collected provided independent verification that fishing is in line with ICCAT measures.

Furthermore, the Bermudian Government are trialling an electronic monitoring system on its longline vessel to support validation of catch composition and landings in Bermuda.

**Rec. 13-13: One vessel without IMO number reported for inclusion on ICCAT Record of Vessels**

The IMO number in question was submitted to rectify this element subsequent to the 2019 Compliance Committee meeting (27<sup>th</sup> December 2019).

I provide a summary version of this information in the template that was provided, attached in an MS Word document, as requested.

Yours sincerely,

Kylie Bamford

Head of Marine Conservation  
Polar Regions Department, Overseas Territories Directorate

## COMPLIANCE LETTER RESPONSE TEMPLATE

2019 Commission Meeting			
CPC: UK-OT			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
Response to COC Chair letter from previous year: <b>Replied</b>			
Annual Report	Rec. 18-13 BCD Annual Report received late.	A report was submitted at the 2019 Compliance Committee meeting to correct this element. Electronic documentation of bluefin tuna catch has been submitted in 2020	During 2019 Compliance Committee meeting
Statistical data reporting	Rec. 16-14: No scientific observer programme in place.	Establishment of an observer programme for the UK Overseas Territories remains to be challenging, though action is underway to improve the situation as follows:	
		<p>St Helena Marine section collect data from a single landing point, submitting all length weight information via Task I &amp; II data.</p> <p>Investment in additional human resource at St Helena has increased staff capacity, employing a Fisheries Officer and Enforcement Officer.</p> <p>Investment in fisheries research at St Helena has contributed to 69 days tuna tagging conducted under commercial fishing conditions. Whilst this is not an observer programme, the data collected helps independent verification that</p>	

		<p>fishing is in-line with ICCAT measures.</p> <p>Investment in an electronic monitoring system has supported validation of catch composition and landings in Bermuda.</p>	
Conservation and Management Measures	One vessel without IMO No. reported for inclusion on ICCAT Record of vessels.	IMO number submitted to rectify this element subsequent to the 2019 Compliance Committee meeting.	27/12/2019
Catch limits/quotas			
Other issues			

**DEREK CAMPBELL**

Chair of the Compliance Committee  
International Commission for the Conservation of Atlantic Tunas (ICCAT)

I have the honour to address you and I would like to extend warm regards to you and your work team, on behalf of all the staff working at this ministry. I wish to provide a response to your ICCAT circular #6465/2020 of 21 September 2020 regarding the documents related to compliance with Commission requirements by the Bolivarian Republic of Venezuela.

In this regard, for your information and subsequent purposes, we are sending Venezuela's 2019 Annual Report. Moreover, we respectfully inform that a response was given on 26 November 2019 to the remarks made in communication No. 6574/2019, sent by ICCAT on 18 September 2019 (attached).

With nothing further to add, I appreciate your attention in this matter, and I take this opportunity to reiterate to the International Commission for the Conservation of Atlantic Tunas (ICCAT) the assurances of my highest and distinguished consideration.

Yours sincerely,

Rodger Leonardo Gutierrez  
Director General  
Office of Integration and International Affairs  
Ministry of the People's Power for Fisheries and Aquaculture  
Caracas - Venezuela



BOLIVARIAN REPUBLIC OF VENEZUELA  
 Ministry of People's Power for Fisheries and Aquaculture  
 MPPPA-19-Nº: Q 1 8 5

Caracas, 26 November 2019  
 3DG 19 1 1 2 6 3 48

Dear

**Mr. DEREK CAMPELL**

Chair of the Compliance Committee

International Commission for the Conservation of Atlantic Tunas (ICCAT)

I would like to take this opportunity to extend my warm greetings to you, and to provide a response to concerns raised in the ICCAT communication No. 6574 of 18 September 2019, regarding underreporting and compliance deficiencies by the Bolivarian Republic of Venezuela in relation to the ICCAT requirements indicated at the 21st Special Meeting of the Commission, held in the city of Dubrovnik, Croatia, in 2018.

In this regard, we therefore respectfully inform you of the following:

1. The blank responses in the report and/or those containing the term not applicable, relate to topics that do not apply to the national fisheries or that are developed under other reporting points under section 3.
2. As to overage of northern albacore (ALB) and white marlin (WHM), we would like to indicate the following:
  - Venezuela targets tropical tunas, therefore these species are taken as bycatch. As part of the action plan, the country has implemented discards since 2014 for ALB and since September 2018 for WHM to reduce overage, and official notification is given to the Venezuelan fishing fleet.
  - As to sailfish (SAI) catches, the Venezuelan fisheries administration published in 2003 in Official Gazette No. 37,787 of 1 October 2003, a management measure regulating fishing and trade in species of the *Istiophoridae* and *Xiphiidae* families.
3. As to form CP01, an initial list of authorised vessels was submitted on 03/08/2018, which was confirmed by the Commission on 10/09/2018. The second list of vessels authorised by Venezuela to operate in the Convention area was forwarded to the Commission on 7/12/2018 and confirmation was received on the same day. However it should be noted that within the policies issued by the authorities, for next year, measures are envisaged to issue permits through well organised processes that enable more accurate update of the list of vessels, which can be submitted to ICCAT in a timely manner, and the relevant requirements and recommendations of the Commission would be met.
4. It is necessary to highlight the willingness of the Fisheries Administration to strengthen the scientific observers programme in our country, based on the protocols established by ICCAT. In this respect, we are working to formulate the curriculum structures in accordance with Commission requirements, to ensure the efficiency of the measures agreed therein and more effective compliance by Venezuela.
5. As to Rec. 16-13, Venezuela has submitted relevant catch data in Tasks I and II. There is also the action plan, which has been developed as a mitigating measure, to regulate these catches. And Official Gazette No. 39,947 of 2012 regulates shark catches by vessels flying the national flag or foreign flags in aquatic areas under the sovereignty of the Bolivarian Republic of Venezuela, and by vessels flying the national flag operating in the high seas or under bilateral or multilateral agreements, as well as distribution, exchange, trade and transport of shark at the national level.

Moreover, it should be noted that on 24/01/2019 responses were provided to the remarks made in communication N°3236/2018 sent by ICCAT on 17 May 2018 (attached).

It should be highlighted that the Bolivarian Republic of Venezuela and the authorities within the Fisheries Administration, have taken a very responsible approach to implementation of the management measures to regulate fishing activity, in order to ensure the sustainability of hydro biological resources, by applying the precautionary approach, which is based on the best available scientific evidence.

I thank you in advance for all your attention in this matter, and I take this opportunity to express to you my highest esteem.

Signed: DANTE RIVAS

Seal: MINISTRY OF PEOPLE'S POWER FOR FISHERIES AND AQUACULTURE

RESPONSE TO LETTER OF COMPLIANCE

<b>2018 Commission Meeting</b>			
<b>CPC VENEZUELA</b>			
<i>Area of deficiency</i>	<i>Specific element</i>	<i>Remedial action taken</i>	<i>Date missing data/information sent (if applicable)</i>
Response to the Letter of the COC Chair from the previous year: not responded to	Response sent to the COC Chair.		The response was provided to the Commission on 24/01/19. The information requested, according to Official Communication DVPP 19-N 002 of 21/01/19, was based on the request made by the Chair of the Compliance Committee at the 21st Special Meeting, held in Dubrovnik - Croatia 2018.
Annual Report	Annual Report received late.		Information sent on 13/09/2018 to the Commission at info@iccal.int.
	"Not applicable" not explained in all cases and not all the elements in Section 3 responded to.	As to the blank responses in the report and/or the term not applicable, we should point out that some of the points relate to topics that do not concern us or that have not yet been developed by the country.	
Statistical data reporting	Statistical data received late and possibly incomplete.		Information sent on 13/09/2018 to the Commission at info@iccal.int.
	Rec. 16-14: Data have not been received on the national scientific observers programme (ST09).	In 2018, the Venezuelan Fisheries Administration approved a bill to implement the National Onboard Observers Programme from January 2020, for collection of scientific data on our fisheries that are subject to the ICCAT mandate.	

VENEZUELA

<p>MCS measures</p>	<p>Rec. 13- 13/14-10: Vessels communicated for inclusion in the Record with more than 45 retroactive days</p>	<p>Within the policies issued by the authorities, for next year, measures have been envisaged for issue of fishing permits through well organized processes that enable more accurate update of the list of vessels, which can be forwarded to ICCAT in a timely manner, and the relevant requirements and recommendations of the Commission would be complied with.</p>	<p>The first list was sent on 03/08/2018 to the Commission. On 07/12/2018 the second list was sent to the Commission at info@iccat.int.</p>
	<p>Rec. 16-01: BET catch reports have not been submitted for the past two quarters of 2017.</p>		<p>Information sent on 17/04/2018 to the Commission at info@iccat.int.</p>
	<p>Recs. 10-09/11-10: No response.</p>	<p>Bycatch catch data were presented in document SCRS/2017/210. They show that catches of seabirds and sea mammals were not significant in our fisheries. However, this was not highlighted in form ST09, since the handling of this is very difficult to process and/or understand. It should be indicated that we are interested in participating in any relevant research and training in this case, so as to comply with Commission requirements.</p>	
	<p>Rec. 16-13: No legally binding measures to implement shark requirements.</p>	<p>In 2012, the Venezuelan Fisheries Administration implemented an Action Plan that had been developed as a mitigating measure to regulate shark catches by vessels flying the national flag or foreign flags in aquatic areas under the sovereignty of the Bolivarian Republic of Venezuela, and by vessels flying the national flag operating in the high seas or under bilateral or multilateral agreements, as well as distribution, exchange, trade and transport of sharks at national level. It was published in Official Gazette No. 39,947 of 2012, and is one of the most comprehensive shark management plans.</p>	

<p>Catch limits / quotas</p>	<p>Rec. 11- 11: Compliance tables submitted late. Overage of NALB and BUM continued.</p>	<p>a) In 2012, Venezuela presented an action plan to reduce catch overages for the North Atlantic. In this respect, from 2014, an internal annual quota of 200 t has been established for the country, as a control measure for the entire Venezuelan baitboat, purse seiner and longline tuna fleet operating in the area of the Caribbean Sea and Atlantic Ocean. Once the established quota of 200 t is reached, tuna individuals are discarded. These discards are delivered in port to the Fisheries Administration, as a social contribution to support the country's food security and sovereignty.</p> <p>b) Since 2003, when Venezuela published in Official Gazette No. 37,787 dated 1 October 2003, has implemented a management measure regulating fishing and trade in species belonging to the Istiophoridae and Xiphidae families. In the past 3 years, our country has had an overage of white marlin (WHM). In this regard, from September 2018, and internal annual quota of 30 t has been established for the country, as a control measure for all the Venezuelan baitbait, purse seine and longline tuna fleet operating in the area of the Caribbean Sea and Atlantic Ocean. Once the establish quota of 30 t has been reached, the individuals of white marlin are discarded and the discards are delivered in port to the Fisheries Authorities as a social contribution, to support the country's food security and sovereignty.</p> <p>It should be noted that these species are not targeted by our tuna fleet. They are considered bycatch. Furthermore, these measures are implemented subject to notification being given to the vessel owners of the industrial tuna fleet.</p>	<p>Information sent on 31/10/2018 to the Commission at info@iccat.int.</p>
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Other matters		The Venezuelan Fisheries Administration adapted the technical units responsible for processing the information required by the Commission, for the purpose of complying with all its recommendations and requirements.	
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