

**RESPONSES FROM NON-CONTRACTING PARTIES (NCPs) TO
COC CHAIR'S LETTERS REGARDING COMPLIANCE**
(Received before 20 October 2020)

Five letters were sent to non-Contracting Parties following the 2019 Commission meeting. The original letters sent are contained in **Annex 1**. To date, two replies have been received: Gibraltar and St. Lucia.

<i>NCP</i>	<i>Main concern</i>	<i>Reply received</i>
Dominica	Continued ID under trade measures, lack of response in 2018/2019.	<u>Reply received on 17 September 2020</u>
Gibraltar	Reiterate request information on catch data and BFT controls.	Reply received on 31 July 2020
St. Kitts & Nevis	Reiterate request for information on fisheries management regimes.	
St. Lucia	Reiterate request for information on fisheries management regimes.	Reply received on 12 October 2020
Tanzania	Letter requesting information on Access Agreement with Colombia	



COMMONWEALTH OF DOMINICA

**Ministry of Blue and Green Economy, Agriculture
and National Food Security**

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Government Headquarters
Kennedy Avenue, Roseau
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17th September, 2020

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

SUBJECT: Cooperation with ICCAT

Dear Mr. Campbell,

On behalf of the Commonwealth of Dominica (hereinafter referred to as Dominica), I acknowledge receipt of your letter of 3 July 2020. I also acknowledge receipt of the copies of your letters of 6 June 2018 and 18 September 2019 that were enclosed with the letter of 3 July 2020. I regret that Dominica has not been able to respond before now. Dominica is a Small Island Developing State that is heavily dependent on its pelagic fishery resources. I am pleased to provide the following information on our tuna and tuna-like fisheries operations so as to improve ICCAT's understanding of the operations of interest, and on-going efforts to improve Dominica's cooperation with ICCAT.

Dominica has a fishery composed of about 430 small fishing boats and under 1000 active fishers. The fishing boats are open, having no deck, usually under 30 feet (<10 metres) in total length, and powered by outboard motors or manually by oars. Mean annual catches of all species are about 1000 tonnes. The fisheries sector is based on subsistence and artisanal operations in nature. Traditional fishing technology (manually operated), such as fish taps and handlines, is still the primary means of catching fish. The fisheries are multi-species in nature, targeting and harvesting a variety of species at the same time.

As an island nation, Dominica has limited land-based resources and is heavily reliant on fishing to supply protein, reduce poverty and provide essential employment and livelihoods to many of its rural coastal communities. Increased use of the coastal space for non-fishing activities has challenged the role of fishers in many of these communities, prompting a shift from fishing for inshore reef resources and small coastal pelagic resources to fishing offshore pelagic resources over the last two

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decades. Many of these fishers are ill-equipped to move to other sectors in rural communities; the potential for diversifying income generation is very low, leaving fishing as the best option.

Consequently, species such as the Atlantic blue marlin (*Makaira nigricans*) have remained a part of the local catch and local diet. Blue marlin is frequently available within the territorial waters of Dominica, and hence is caught opportunistically around Fish Aggregating Devices (FADs) and often when preferred, higher value species such as dolphin fish (*Coryphaena hippurus*) and yellow fin tuna (*Thunnus albacares*) are less abundant and available. FADs have been in use for almost two decades and instrumental for developing the small-scale offshore fisheries by reducing fishing time and cost of operations to fishers.

In 2017, blue marlin was about 74 tonnes or 9% of the total estimated landings for Dominica, up from 51 tonnes in 2016 (about 5.6% of total landings). However, there was a decline in marlin landings in 2018, at 52 tonnes or 7% of total landings and in 2019, at 45 tonnes or 5.7% of total landings. The observed annual variation in the blue marlin landings was due to the opportunistic nature of the fishing operations concerned.

The Dominica Fisheries Division (DFD) has begun dialogue with fisher folk, given the limited resources, to promote the catch of the preferred, higher value species with some success. However, the multi-species nature of the local fisheries sector means that blue marlin will be occasionally caught, particularly, in times of relative, increased local abundance and availability. The catches are a source of food and a means of survival for some of the poorest, most vulnerable and marginalized communities in Dominican society. Fishers who harvest marlins simply seek to provide for their families' basic needs. Dominica appreciates that this also makes a good case for improved management options especially for blue marlin that has critical status, in view of the need for sustaining the associated, dependent livelihoods. For these reasons, Dominica attaches very high priority to conservation, management and sustainable use of all our fisheries resources including the pelagic species of interest to ICCAT. Additionally, Dominica recognises it has a duty to cooperate with ICCAT, and ICCAT has a similar duty to reciprocate in an effort to ensure proper management and conservation of the blue marlin and other fish stocks of mutual interest.

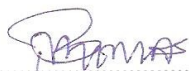
Dominica has maintained a comprehensive fisheries statistical monitoring programme and also made efforts to report tuna and tuna-like fisheries statistics to ICCAT regularly in past years before being impacted by significant natural disasters in 2015 (tropical storm Erika) and again in 2017 (category 5 hurricane Maria). Destruction and damage to infrastructure and economic activities were severe and widespread amounting to over 224% of National Gross Domestic Product. The office and other facilities of the Fisheries Division and many records were destroyed and our ability to communicate and carry out normal, basic functions were severely compromised. The country has still not fully recovered from the devastation and destruction caused by these storms. Rehabilitation and rebuilding efforts are still underway with the support of neighbouring states and the international community.

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Notwithstanding, Dominica will strive for improved cooperation with ICCAT. Specifically, the DFD and the Ministry of Blue and Green Economy, Agriculture and National Food Security will work together to: -

- Improve its fish landings monitoring programme, incorporating field data collection devices and expanded training for field staff which will expedite the capture of landings and facilitate timelier reporting;
- Develop and implement a national management plan for blue marlin, in the short term, and other ICCAT species, in the long term, which will account for: documenting, licensing and issuing logbooks for boats which land those species;
- Targeted education and management campaign for fishers who land blue marlin and other ICCAT species, highlighting the importance of those species and the management measures necessary for sustainable use;
- Explore the options to cooperate more closely with ICCAT, including submission of data for years outstanding that is 2014 to 2019 by the end of August 2020, resumption of the annual reporting of fisheries statistics in the future, and adherence to ICCAT regulatory measures in ways that are practical for our available resources.

Dominica looks forward to strengthening our mutual cooperation with ICCAT to ensure proper conservation and management of the tuna and tuna like species for the benefit of all states harvesting these resources.



.....
REGINALD THOMAS (DR.)
PERMANENT SECRETARY (AG.)

RT/flm

GIBRALTAR

ICCAT Secretariat
C/Corazón de Maria 8-6a 28002 Madrid
Spain



Department of the Environment,
Sustainability, Climate Change
and Heritage

HM Government of Gibraltar

Subject: Management and catches of Bluefin tuna in Gibraltar

Dear Sir/Madam,

31/07/2020

I refer to the letter sent by Mr. Derek Campbell (Compliance Committee Chair) to the Hon. Prof. John Cortes on the 3rd July 2020.

Please find enclosed a summary of our statistical data pertaining to Atlantic Bluefin tuna *Thynnus thunnus* catches in Gibraltar for the period 2015-2019. Trust these data will assist your ongoing data collection and monitoring efforts for the wider Mediterranean. We remain at your disposal should you require any technical clarification on the data presented.

A more comprehensive reply will follow from the Hon. Prof. John Cortes before the 21st October 2020 containing information on the specific management measures adopted in British Gibraltar Territorial Waters to control Bluefin tuna fishing.

The Department would like to take this opportunity to thank the Secretariat for reaching out to Gibraltar and looks forward to further engagement and cooperation to ensure the sustainable management and conservation of Atlantic Bluefin tuna.

Yours sincerely,

Stephen Warr
Senior Environment Officer
Department of the Environment, Sustainability, Climate Change and Heritage

Original: English

Statistical correspondent		
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Affiliation	Department	Department of the Environment, Sustainability, Climate Change and Heritage - HM Government of Gibraltar
	Address	Suite 1B Leanse Place, Town Range, Gibraltar, GX11 1AA
	Country	Gibraltar (UK)
Fleet Characteristics		
Reporting Flag	UK.Gibraltar	
Base Port	Gibraltar	
Gear group code	RR (Rod and reel)	

Catch data					
Speciescode/ScientificName	BFT - <i>Thunnus thynnus</i>				
Year	2015	2016	2017	2018	2019
Total Allowable Catch (tons)	13	13	15.5	15.5	16.74
Actual catch/landings (kg)	12,746	13,894*	16,109*	14,603	17,378*
Average weight (kg)	47	88	98	121	117
Largest specimen (kg)	271	274	279	299	267
Total licensed recreational/sport anglers landing	91	75	65	61	76
Total effort (Days in Open Season)	123	121	69.5	93	39.5

Notes:

*Actual catch is slightly higher than TAC as a result of the necessary administrative time to give effect to the closure of the season.

SANTA LUCIA

Ministry of Agriculture, Fisheries, Physical Planning, Natural Resources ana Co-operatives



5th Floor, Sir Stanislaus James
Building Castries, Saint
Lucia



Communications on this subject
should be addressed to:
THE HONOURABLE MINISTER
and the following Number quoted:

October 06, 2020

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

Dear Mr. Manel,

The Department of Agriculture, Fisheries, Natural Resources and Co-operatives, Saint Lucia, is in receipt of your correspondence dated July 3, 2020.

Saint Lucia is party to the United Nations Convention on Law of the Sea which defines the rights and responsibilities of nations with respect to their use of the world's oceans, establishing guidelines for businesses, the environment, and the management of marine natural resources. As such, Saint Lucia appreciates the need to coordinate and ensure the conservation and development of shared, straddling and highly migratory fish stocks without prejudice to the other provisions of the Convention; noting in particular, the sovereign rights of a coastal state for the purpose of exploring and exploiting, conserving and managing the natural resources, and promote the objective of optimum utilization of the living resources within the Exclusive Economic Zone (EEZ).

With regard to straddling stocks, the coastal State and "the States fishing for such stocks in adjacent area" are exhorted to seek to agree upon the measures necessary for the conservation of these stocks in the adjacent area"(Article 63(2)). Article 64 deals with highly migratory species using slightly stronger language. The coastal State and other fishing States are required to cooperate, through appropriate international organizations, with the objective of ensuring the conservation and optimum utilization of these stocks both within and beyond the EEZ.

Saint Lucia is also party to the UN Agreement Relating to the Conservation and Management of Straddling Fish Stocks and Highly Migratory Fish Stocks, which supplements and strengthens Articles 63(2) and 64 of the Convention by establishing a comprehensive regime with detailed principles, and specific rules and standards aimed at achieving effective and compatible conservation and management measures to achieve optimum sustainable use of fisheries on the high seas and within areas under national jurisdiction.

Consequently, Saint Lucia will continue to promote and facilitate mutual cooperation with ICCAT by, *inter alia*, providing data and information on species of interest to ICCAT and to further refine, update and implement national management plans taking into consideration recommendations from ICCAT, where applicable, based on the scientific findings on the status of the stocks as well as the socio-economic importance of the fishery and its contribution to food security.

Further, Saint Lucia acknowledges the work of ICCAT in maintaining populations of tuna and tuna-like fish in the Atlantic Ocean at levels permitting the maximum sustainable catch for food and other purposes since its entry into force in 1966. It is noted, however, that the Intergovernmental Convention on the Conservation of Atlantic Tunas entered into force thirteen (13) years prior to Saint Lucia becoming a sovereign coastal State. Consequently, it would be important to also equally ensure that the objectives, mandate and measures developed by ICCAT take into account the special needs of developing coastal States such as Saint Lucia in accordance with Article I 19(I) of the Convention, Part VII, Articles 24 to 26, of the Fish Stocks Agreement and Article 5.2 of the FAO Code of Conduct on Responsible Fisheries.

Saint Lucia is unable to be a contracting or cooperating party to ICCAT, but nonetheless, reassures you of the country's continued commitment to the submission of relevant fisheries statistics. Further, we also look forward to receiving timely updates on the actions, measures and programmes adopted by ICCAT that will affect the fishing interests of Saint Lucia within its national waters including the measures adopted to ensure sustainability use of both target and non-target species.

We wish your organisation continued success. Please accept the assurance of my highest regard.

Sincerely
(signed)

Ho. Herod Stanislas
Minister (Ag)

