

Responses from CPCs to letters from the Chair of the Compliance Committee

This Document contains response to the letters from the Chair of the Compliance Committee received by **7 October 2022**. Replies received after the deadline will be presented as **Addendum** to **COC-309**.

Annex 1 of document **COC-309** contains the letters sent by the COC Chair.

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

<i>CPC</i>	<i>Letter type</i>	<i>Reply received</i>	<i>Template completed</i>	<i>Missing information sent</i>
Albania	RI	16/09/2022	Yes	Yes
Algeria	None	Not applicable		
Angola	RI	No reply		
Barbados	RI/II	01 October 2022	Yes	Partially (see response template for more explanations)
Belize	None	Not applicable		
Brazil	None			
Cabo Verde	RI/II	No reply		
Canada	None	Not applicable		
China PR	II	23 September 2022	n/a	No (see letter)
Côte d'Ivoire	II/RI	No reply		
Curaçao	None	Not applicable		
Egypt	RI/II	29 September 2022	Yes	Yes
El Salvador	RI	29 September 2022	Yes	Yes
Equatorial Guinea	RI/II	27 July 2022	Yes	Yes (except scientific observer programme; request assistance)
European Union	RI/II	01 October 2022	Yes	Yes
France SPM	None	Not applicable		
Gabon	RI	17 September 2022	Yes	Yes
Gambia	RI/II	No reply		
Ghana	RI/II	01 October 2022	Yes	Partial (see response template for more information)
Grenada	RI	No reply		
Guatemala	RI/II	14 September 2022	Yes	Yes

<i>CPC</i>	<i>Letter type</i>	<i>Reply received</i>	<i>Template completed</i>	<i>Missing information sent</i>
Guinea Bissau	ID letter - recurring significant reporting issues	No reply		
Guinea Rep.	ID letter - recurring significant reporting issues	No reply		
Honduras	RI/II	30 September 2022	yes	No. See response template for explanation
Iceland	None	Not applicable		
Japan	None			
Korea	None			
Liberia	RI/II/OH	No reply		
Libya	RI/II	30 September 2022	Yes	Yes
Mauritania	RI/II	No reply		
Mexico	None	Not applicable		
Morocco	None			
Namibia	ID letter - recurring significant reporting issues + recurrent overharvest	No reply		
Nicaragua	RI	30 September 2022	Yes	Yes (for current year)
Nigeria	RI	No reply		
Norway	None	Not applicable		
Panama	RI/OH	14 September 2022	Yes	Yes
Philippines	None	Not applicable		
Russia	None			
São Tomé e Príncipe	RI	No reply		
Senegal	RI/II	01 October 2022	Yes	Yes
Sierra Leone	RI/II	No reply		
South Africa	None	Not applicable		

<i>CPC</i>	<i>Letter type</i>	<i>Reply received</i>	<i>Template completed</i>	<i>Missing information sent</i>
St Vincent & Grenadines	RI/II	4 October 2022 (after 1 Oct deadline)	Yes	No, quarterly Tropical catch reports missing
Syria	RI/II	No reply		
Trinidad & Tobago	RI/II/OH	29 September 2022	Yes	Yes
Tunisia	None	Not applicable		
Türkiye	None			
Uruguay	None			
UK	RI/II	29 September 2022	Yes	Yes (except observer data see template for explanation)
USA	None	Not applicable		
Venezuela	RI	No reply		
Bolivia	None	Not applicable		
Chinese Taipei	RI	12 August 2022	n/a	Yes
Costa Rica	ID letter - recurring significant reporting issues + recurrent overharvest	01 October 2022	Yes	Yes
Guyana	ID letter- recurring significant reporting issues and recurrent overharvest	29 September 2022	Yes	Yes
Suriname	None	Not applicable		

MINISTRY OF AGRICULTURE AND RURAL DEVELOPMENT
Tirana on 16/09/2022

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

SUBJECT: RESPONSE TO LETTER ON COMPLIANCE ISSUE (S22-05192, ICCAT-SALIDA 2022-07-15)

Dear Mr. Derek Campbell

On behalf of the CPC Albania, I am writing to response you about the compliance issue regarding the reporting deficiencies in 2021 and listed in your letter.

Please allow me to clarify the listed deficiencies:

- We have sent Task 1 and Task 2 data on July 29,2021. Based on the kind reminder in your letter and thanks to close collaboration and useful help of the Secretariat, Albania revised and delivered all necessary Task 2 data (catch&efforts; size data) for the year 2020 and 2021.
- Actually, we sent in time the Check Sheets, but unfortunately, we have had used the old version of the templates. As soon as Compliance Committee remarked this mistake, we corrected the both templates and sent them to ICCAT.
- CPC Albania exercises its BFT activity with two purse seiner vessels during the campaign and Albania does not have a scientific observer on board program. On the other hand, since 2019 and supported by GFCM, Albania implemented the by-catch monitoring program through the observers on board of fishing vessels (bottom & pelagic trawlers and purse seiners) in the Adriatic Sea aiming to obtain representative data on the discard component of total by-catch, as well as information on the incidental catch of vulnerable species. In the frame of Annual Report 2022, CPC Albania provided to ICCAT "Albania Final Report 2021-2022".

I do apologize for the late reporting and CPC Albania will continue to make all necessary efforts to be timely reporting and in full compliance with recommendations of ICCAT.

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

Head Delegate to ICCAT

(signed)

Arian Palluqi

Appendix 1

Compliance letter response template

2021 Commission Meeting			
CPC: ALBANIA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE 2021 MEETING	DATE MISSING DATA/INFORMATION SENT (if applicable)
Category A			
<i>Compliance Tables</i>			
<i>Capacity, size, gear, time, area restrictions</i>			
Category B			
<i>Annual Report</i>			
<i>Statistical Data</i>	No Task 2 data	Albania revised and delivered all necessary Task 2 data (catch&efforts; size data) for the year 2020 and 2021.	Sent to ICCAT 18/8/2022
<i>Other reports - shark and billfish check sheets</i>	Check Sheets received late (29 Sept 2021)	We have had used the old version of the templates. As soon as Compliance Committee remarked this mistake, we corrected both the templates.	Sent to ICCAT 2021
Category C			
<i>MCS- species related</i>			
<i>MCS- general : Port Controls</i>	No scientific observer data	CPC Albania exercises its BFT activity with two purse seiner vessels during the campaign and Albania does not have a scientific observer on board program. On the other hand, since 2019 and supported by GFCM, Albania implemented the by-catch monitoring program through the observers on board of fishing vessels (bottom & pelagic trawlers and purse seiners) in the Adriatic Sea aiming to	Sent to ICCAT 15/9/2022

		obtain representative data on the discard component of total by-catch, as well as information on the incidental catch of vulnerable species. In the frame of Annual Report 2022, CPC Albania provided to ICCAT "Albania Final Report 2021-2022".	
<i>Vessel Controls</i>	Possible infraction under JIS		
OTHER			
Response to COC Chair letter from previous year?	Not applicable		

BARBADOS

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

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

Dear Mr. Campbell

I refer to your letter S22-15192, of 15th July 2022, identifying a few compliance deficiencies, which are being addressed within the legal channels. Please find enclosed the response to the queries raised. I regret the delay in responding.

Please accept assurances of my highest consideration.

Sincerely,

(signed)

Joyce Leslie (Mrs.)

CHIEF FISHERIES OFFICER (Ag)

Compliance letter response template

2021 Commission Meeting			
CPC: BARBADOS			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE 2021 MEETING	DATE MISSING DATA/INFORMATION SENT (if applicable)
Category A			
<i>Compliance Tables</i>	Some discrepancies between catch reported in Compliance Tables and Task 1 data	No known discrepancies between Task 1 data and catches reported in most recent Compliance Tables.	
<i>Capacity, size, gear, time, area restrictions</i>			
Category B			
<i>Annual Report</i>			
<i>Statistical Data</i>			
<i>Other reports</i>	Rec. 19-02 para. 13: Some Task 1 of tropical tuna species submitted for 2020 but no corresponding quarterly reports.	Reports for 1st 2 quarters for 2022 submitted September 15 th , 2022.	Completed submissions for 2020 and 2021 submitted October 1 st , 2022.
Category C			
<i>MCS- species related</i>			
<i>MCS- general:</i>	Rec. 16-14: No scientific observer programme	One of the major difficulties encountered in the implementation of is related to the lack of any supporting legislation. Once enacted, the 2021 draft Fisheries Management Regulations and other subsidiary legislation will facilitate by force of law the implementation of a range of measures such as observer programmes and the EMS-based that would be the only viable option for Barbados' small fishing vessels.	

<i>Port Controls</i>	Rec. 18-09 para 10: No list of designated ports received	Communication with Barbados Port Inc. has started, the entity with responsibility for the Bridgetown Port, Under cap 285B, the designated Port of entry for foreign vessels.	Requisite Form CP24-AuthPorts-TRI to be filled with Barbados Port Inc. guidance shortly.
<i>Vessel Controls</i>			
OTHER			
Response to COC Chair letter from previous year?	Received		

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

22 September 2022

To: Mr. Derek Campbell
Compliance Committee Chair

Cc: Mr. Ernesto Penas
Chair of International Commission for the Conservation of Atlantic Tunas

SUBJECT: REPLY LETTER OF CHINA ON COMPLIANCE ISSUES IN 2021

Dear Mr. Chair,

Thank you for your letter on compliance issues dated July 15, 2022.

To start with, I would like to extend our sincere gratitude to you as well as the Secretariat and the Commission for all efforts and contribution on promoting compliance within ICCAT.

China always attaches great importance of ICCAT compliance issue and devotes itself to comply with ICCAT Convention and recommendations through formulation of national regulations, training of fisherman and fishing companies, strengthening monitoring and management of fishing vessels, and so on. Regarding the MCS Measures about no list of designated ports (Rec. 18-09), I would like to address the further following actions that China had taken.

First, the Ministry of Agriculture and Rural Affairs of China conducted the research and feasibility study of ratifying the FAO Port State Measures Agreement. However, port designation and inspection in China involve many departments from different ministries. Currently, we are still in the process of internal coordination for future effective and complete implementation of port state measures.

Second, China had conducted several port inspections for some foreign vessels on a case-by-case basis upon the request of other states or RFMO during the past years, and also the Ministry collected IUU vessel lists of RFMOs of which China is a member and circulated to local ports in order to prevent port call of vessels on such lists and refuse port service to them. China would like to continue this practice until ratifying the FAO Port State Measures Agreement.

We would like to reiterate our commitment to comply with the ICCAT recommendations to our best for the purpose of long term conservation and sustainable utilization of fishery resource among ICCAT Convention area.

Best regards,

(signed)

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

Compliance letter response template

2021 Commission Meeting			
CPC: EGYPT			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE 2021 MEETING	DATE MISSING DATA/INFORMATION SENT (if applicable)
Category A			
<i>Compliance Tables</i>			
<i>Capacity, size, gear, time, area restrictions</i>			
Category B			
<i>Annual Report</i>			
<i>Statistical Data</i>	Task 1 for BFT (zero catch reported) does not coincide with catches reported in compliance tables, weekly reports and ROP information.	Revised Task 1 submitted 7 November 2021.	
<i>Other reports – shark and billfish check sheets</i>			
Category C			
<i>MCS-species related</i>			
<i>MCS-general: Port Controls</i>	Rec. 16-14: Not clear if 5% observer coverage is being met.	It was mentioned in the annual report part II, Section 3 in third paragraph that “The Egyptian vessel was carried out JFO with Libya. This operation was completely observed by the regional and national observers 100%”.	
	Rec. 16-05: No designated SWO-MED ports submitted, but small amount of SWO-MED reported in Task 1.	CP 24 sent on 29/09/2022.	
<i>Vessel Controls</i>			
OTHER			
Response to COC Chair letter from previous year?	Not applicable		

Ministry of Agriculture and Livestock – Government of El Salvador

**Centre for Fisheries and Aquaculture Development
(CENDEPESCA)**

Santa Tecla, 27 September 2022

Mr. Derek Campbell
Compliance Committee Chair
ICCAT

Subject: Response to the letter on compliance related issues

I would like to refer to the ICCAT communication with reference number 2022-07-15 S22-05192, on deficiencies in reporting and implementation of the Commission measures by El Salvador.

Firstly, we welcome your acknowledgement of the improvements implemented by El Salvador. Moreover, we would like to address the single element referred to as a discrepancy and relates to a failure to report BUM catches in the ST02-T1NC form.

We have seen that the document ST02-T1NC did not include those catches. This is because it was our understanding that only target catches were reported in this form; while bycatch was reported in the ST09 form; where we did report these data. In previous years, the ST02 forms have only been completed with the main catches, ST09 being the statistical document with the information related to bycatch data.

Informed of the circumstance, we have attached herewith the updated ST02 forms for 2019 and 2020. It should be noted that the discrepancies arose from a confusion regarding completion and not from an intention to omit these catches. On 2 July 2020, we clarified to the Secretariat the data and the confusion and we submitted the ST02-T1NC form updated with the data corresponding to the 2020 BUM catch.

Having attached the response form and clarified the situation, El Salvador considers that it has complied with the submission of all the required data. We would also like to reiterate that El Salvador is fully convinced of and committed to the provisions of the ICCAT Convention, its recommendations and its resolutions. As such, it is our responsibility to ensure compliance with the Commission's provisions.

Thank you for your attention in this matter,

Regards,

Signed:
Edgar Palacios
Head Delegate of El Salvador
Director General

Compliance letter response template

2021 Commission Meeting			
CPC: EL SALVADOR			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE 2021 MEETING	DATE MISSING DATA/INFORMATION SENT (if applicable)
Category A			
<i>Compliance Tables</i>	Some discrepancies between the compliance tables and Task 1 data. The bigeye data have been corrected, but the Task 1 data (ST02) for blue marlin have not been received.	The discrepancies had already been clarified in email correspondence with the Secretariat, sent to info@iccat.int . The data for blue marlin displayed as indicated both in the transmission tables, and in the statistical document ST09, both submitted by the deadline. We resubmit the same information in the ST02 document.	Compliance tables with the blue marlin information submitted on 28/07/2021. Statistical document ST09 with the blue marlin information submitted on 21/07/2021. We include statistical document ST02 updated with the blue marlin information.
<i>Capacity, size, gear, time, area restrictions</i>			
Category B			
<i>Annual Report</i>			
<i>Statistical Data</i>			
<i>Other reports – shark and billfish check sheets</i>			
Category C			
<i>MCS- species related</i>			
<i>MCS- general : Port Controls</i>			
<i>Vessel Controls</i>			
OTHER			
Response to COC Chair letter from previous year?	Received	Submitted by the deadline, provided on 01/10/2022.	

Compliance letter response template

2021 Commission Meeting			
CPC: Equatorial Guinea			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE 2021 MEETING	DATE MISSING DATA/INFORMATION SENT (if applicable)
Category A			
<i>Compliance Tables</i>	Rec. 11-11: No compliance tables received.	File CP13-COC appears to have been sent. I am surprised that you did not see it. I may have forgotten to attach the file. In any case I have resubmitted it to you.	Resubmitted on 27/07/2022
<i>Capacity, size, gear, time, area restrictions</i>		As Equatorial Guinea does not have a national tuna fleet it does not specifically fish tuna. Tuna fishing is carried out by foreign vessels licenced for this activity.	
Category B			
<i>Annual Report</i>		Submitted.	25/06/2021
<i>Statistical Data</i>	Some Task 1 data are missing (or zero catch confirmation) for some species. No fleet characteristics data received. No Task 2 data received.	Nil catches confirmed. - As Equatorial Guinea does not have a national tuna fleet, the Task 2 file could not be submitted. Fleet characteristics.	- The nil catches were submitted on 20/06/2021. Nonetheless, these were resubmitted on 27/07/2022 [Secretariat Note: Zero catches arrived as a letter in pdf but was not included in the ST02 with the positive catches.]
<i>Other reports</i>	Rec. 19-02 para 13: Some Task 1 data on tropical tunas submitted for 2020, but without the corresponding quarterly reports.	The quarterly bigeye tuna catches were submitted. Nonetheless, we have resent this file.	Submitted on 27/05/2021 [Secretariat note: Submitted in the incorrect format; these were not submitted quarterly but rather a single file with the whole year.]

Category C			
<i>MCS-species related</i>	Rec. 16-14: No national observers programme. (Assistance has been requested.)	A request for support or assistance was made to the Commission to train on board observers, strengthen the statistical system for tuna and tuna-like species, etc. However, to date this support has not been received.	Requested on 15/10/2020
<i>MCS-general</i>			
<i>Port Controls</i>			
<i>Vessel Controls</i>			
OTHER	Rec. 11-15: Letter of prohibition of catch for some species sent in 2022; given that Task 1 data were not submitted for these species. As the data have not been received, to date, the prohibition has not been lifted.	Honestly, to date we have not received another letter of prohibition on catches of some species. The only prohibition that we had on catch dates from 2019 and this was lifted.	The prohibition was lifted on 17 November 2019. Document attached. [Secretariat Note: The letter was sent in January 2022 due to oversight of the reporting of zero catches in the supporting pdf file. It was lifted on 27 July 2022 when confirmation was received again.]
Response to COC Chair letter from previous year?	Not applicable.	I did not receive any correspondence. This may be why I wrote to you saying that it did not appear that you were responding to the messages that I had sent to you.	

EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

International Ocean Governance and Sustainable Fisheries
Regional Fisheries Management Organisations
Deputy Director and Head of Unit

Brussels,
MARE.B.2/CR (2022)

Mr. 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 (S22-05192)

Dear Dr. Campbell,

Thank you for your letter of 15 July 2022. The European Union has carefully considered the issues raised during the 2021 decision making process regarding its performance.

Please find attached our response to the letter of compliance issues (S22-05192) 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 sincerely,

Anders C. JESSEN
Head of Delegation

Annex: Response to the letter of compliance issues

Cc.: Camille Jean-Pierre MANEL, Cristina CASTRO RIBEIRO, Fernando MIRANDA, Agata MALCZEWSKA, Jérôme BROCHE, Oliver SCHULZ, Yves VAN POEKE

Compliance Letter Response Template

2021 Commission Meeting			
CPC: EU			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE 2021 MEETING	DATE MISSING DATA/INFORMATION SENT (if applicable)
Category A			
<i>Compliance Tables</i>	Some discrepancies between Compliance Tables and Task 1 data.	<p>Two major data sources are used to produce catch data in relation to the EU fishing activity:</p> <ol style="list-style-type: none"> 1. Data resulting from the application of EU and/or international fisheries control rules, i.e., data provided by the vessel's master. These are catch declarations post-validated by EU Member States authorities; 2. Catch Estimations based on sampling data from the application of scientific protocols. The estimation of catches and discards is based on data collected under Information and Sampling Observer Programs. 	

		<p>The EU considers that - given that the second category consists of estimations - the data to be considered for the application table are the data collected via catch declarations and therefore considered the official data.</p>	
<i>Capacity, size, gear, time, area restrictions</i>	Some potential issues with shortfin mako and billfish catches	<p>It is not clear what is meant by referring to “potential”. Nonetheless, we have raised awareness with Member States about the importance of timely and complete data submission. We follow up on all data gaps and inconsistencies highlighted by the Secretariat.</p>	
Category B			
<i>Annual Report</i>			
<i>Statistical Data</i>	Some Task 1 data (or zero catch confirmation) missing for some species for EU-France. Some data received late. Some Task 2 data missing.	<p>We have raised awareness with all Member States about the importance of timely and complete data submission. We follow up with France on all data gaps and inconsistencies highlighted by the Secretariat. However, because of the involvement of many actors and the complexity of some of the statistical data sets, the reporting for the EU remains a challenging exercise.</p>	

<i>Other reports</i>	Rec. 18-05 and 18-06: Check sheets received late (30 Sep 2021)	The late submission was due to a misunderstanding / overlooking on the need to (re)submit the sheets in 2021. For 2022 both check sheets have been provided in time to comply with ICCAT calendar.	
Category C			
<i>MCS- species related</i>	Rec. 19-04: One vessel included on EBFT catching list retroactively	One BFT catching vessel was indeed included in the list of authorized vessels with a request and starting date of authorization on 12.07.2021, not respecting the minimum 15 days period before start of the operation (Rec. 19-04, para 50). The reason was a case of administrative error on the part of the flag state, not to timely notify the renewal of the BFT authorization for this specific vessel (confusion with another vessel with the same name), despite the valid fishing permit that had been issued.	
	Possible overharvest of E-BFT and non-compliance with some MSC measures under "Tarantelo" operation	<i>Please find information in Annex to this template.</i>	
<i>MCS- general : Port Controls</i>			
<i>Vessel Controls</i>			
OTHER			
Response to COC Chair letter from previous year?	Received		

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

This paper recapitulates the many initiatives taken by the EU to tackle the Tarantelo case and its root causes. It summarises past submissions by the EU (e.g. COC 318 Appendix 1 / 2021) and provides updates where available.

I. Status of Judicial proceedings

a) Malta

In 2018, the Director General for Fisheries and Aquaculture lodged a complaint with the Executive Police before Tarantelo was publicised in the press media. The case was then taken over by the Executive Police, following receipt of information from foreign investigative authorities, which in turn considered it appropriate to refer the case to the duty Magistrate who started an inquiry.

The fisheries Maltese Authorities have informed being aware that the investigation is still ongoing, but they do not have details on the procedure since the authorities cannot interfere in the work of the courts and it is very difficult to obtain information beyond what is public.

b) Spain

The court cases in Spain are ongoing. We are in the process of collecting updated information on possible progress. We might therefore further update this point of our response.

II. Measures to reinforce the BFT fishery control system

The EU has reported in detail during the 2021 Compliance Committee meeting, on the many measures that the EU has taken to improve the BFT control system and prevent a similar situation from happening again. A summary of them is shown below:

a) EU level

- series of verification and on the ground audits in all EU Member States with active BFT farms and traps
- follow up of shortcomings and opening of two EU infringement procedures (pre-judicial legal action initiated by the European Commission against a Member State for failure to implement EU legislation)
- increase of the control effort carried out by different Member States and under the coordination and supervision of the European Fisheries Control Agency (EFCA), involving a number of fishery patrol vessels and aircrafts
- reforms undertaken by EU Member States concerned to address the identified weaknesses. In particular the Maltese authorities have substantially improved and strengthened the control system over the farms under their jurisdiction, including, in addition to all mandatory controls, the use of seals in transport cages, inspection of all processing vessels upon arrival in Maltese waters and at the moment of landing, the use of underwater drones and the conclusion of Memoranda of Understanding with the Malta Customs and the Malta Police Force.
- After close monitoring by the European Commission of the measures put into place by the Maltese authorities, the European Commission closed the EU infringement procedure in July, considering that the identified issues were now resolved. However, the Commission will continue to monitor the control system in Malta and the other relevant member states.

b) ICCAT level

- in-depth revision of the control related measures contained in ICCAT Rec. 19-04 (EU chaired the ad hoc Working Group on BFT Control and Traceability) and adoption of Rec 21-08

- proposal and adoption of a pilot program to allow the voluntary exchange of inspectors in controls carried out on BFT traps and farms
- proposal and adoption of a pilot project for the implementation of Remote Electronic Monitoring (REM) on board BFT processing vessels; the EU will cover for most of the budget for this pilot project

This year the EU has been working with ICCAT and other CPCs to implement the pilot project BFT processing vessels, which will start with the beginning of the harvest season, at the end of this year. This project will allow the testing of a control system that offers 24/7 monitoring on vessels through which the vast majority of the BFT that is caught passes through.

The EU continues to work in this field towards strengthening control over this fishery and closing loopholes. This year we will propose at the ICCAT annual meeting another pilot project to test the use of stereoscopic cameras during the first transfer and the use of artificial intelligence for the analysis of the video records produced in the different phases of the live BFT fishery.

The EU is optimistic that this project could contribute to closing most of the remaining weak control points that are difficult to address with current means.

III. Possible overharvest of E-BFT

The EU has taken good note of the concerns expressed by various ICCAT CPCs since Tarantelo went public, about how to tackle the alleged underlying overharvest. The EU defends a framework in which compliance with the measures adopted, including maximum allowed catches, is firmly respected.

At this time, we do not have reliable information on the amounts that have been affected. In fact, there have been major contradictions in some of the amounts that have been mentioned publicly in relation with the investigation.

It is also important to note that nothing is known about the origin of these quantities of BFT illegally placed on the market. In fact, Malta, the country to which the investigation seems to give a key role in the illegal trade of the fish, cages fish not only from the EU, but also from several other CPCs (i.e., Algeria, Libya and Tunisia). The percentage of fish coming from other, non-EU, CPCs in Maltese farms is around 45% of the total caged fish per year.

This means that it will be important to wait for the judicial process to be completed. The EU hopes that it will bring about useful information on the amounts and origin of this illegal fish. However, the EU anticipates that in any case there may be serious difficulties to determine which CPC(s) have caught more BFT than allowed and in what proportion.

The EU will keep informing ICCAT of developments in the investigation as soon as details can be made public or rulings are issued in the cases that are before the courts. In general, the EU has done a lot to address the systemic weaknesses that plagued BFT control. We remain committed to doing everything possible to follow up on this issue when the information becomes publicly available.

MINISTRY OF FISHERIES AND MARITIME ECONOMY
GENERAL SECRETARIAT
GENERAL DIRECTORATE OF FISHERIES AND AQUACULTURE

N°...../MPEM/SG/DGPA

Libreville

To
Monsieur Derek Campbell
Compliance Committee Chair

Madrid

Subject: Letter on compliance issues

Ref.: V/L N°5192 of 5 July 2022

Dear Chair,

Following your letter referenced above, on compliance issues, we have amended our information centralisation procedures to reduce transmission times so as to submit the information to the Secretariat on time.

As to Task 2 data, we have not collected these data in 2020 and as regards Task 1 fleet characteristics data we do not have a fleet directed at tunas. Unfortunately, we have observed that this notification has not been taken into account each time that we transmit our reports. Therefore, for 2021, we have submitted a form.

Furthermore, for the data on the national observers programme, a review of the historical data has been carried out this year. Accordingly, a completed form has been submitted to the Secretariat with the information for 2019 and 2020.

We thank you for your ongoing collaboration,

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

ICCAT Focal Point for Gabon
Davy ANGUEKO

Appendix 1

Compliance letter response template

2021 Commission Meeting			
CPC: GABON			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE 2021 MEETING	DATE MISSING DATA/INFORMATION SENT (if applicable)
Category A			
<i>Compliance Tables</i>	Compliance tables received after the established deadlines (29 September 2021).	Information collected before the deadline.	
<i>Capacity, size, gear, time, area restrictions</i>			
Category B			
<i>Annual Report</i>	Annual Report received late (29 September 2021) and one section missing. Some "non-applicable" responses were not accompanied by an explanation.	Information collected before the deadline.	5 September 2022.
<i>Statistical Data</i>	Task 2 data not received. Data on Task 1 fleet characteristics not received.	No tuna fleet.	31 July 2022. Submitted on 31 July.
<i>Other reports – shark and billfish check sheets</i>	Rec. 18-05 and 18-06: Shark or billfish check sheets received after the established deadlines (30 September 2021).	Submission by deadline.	1 September 2022.
Category C			
<i>MCS- species related</i>			
<i>MCS- general : Port Controls</i>	Rec. 16-14: Information/ data on observers programme not received (ST09).		31 July 2022.
<i>Vessel Controls</i>			
OTHER	Response received. Prohibition imposed in accordance with Rec. 11-15.		
Response to COC Chair letter from previous year?			

Compliance letter response template

2021 Commission Meeting			
CPC: GHANA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE 2021 MEETING	DATE MISSING DATA/INFORMATION SENT (if applicable)
Category A			
<i>Compliance Tables</i>			
<i>Capacity, size, gear, time, area restrictions</i>			
Category B			
<i>Annual Report</i>			
<i>Statistical Data</i>	Rec. 19-02: No historical FAD data.	Data recorded in MS Excel format. Integration of data collected is a challenge as indicated in Section 5 of Annual Report. However, work is being done to obtain information from the data collected to be submitted.	
<i>Other reports</i>	Rec. 18-05 and 18-06: Check sheets received late (30 Sept 2021), and incorrectly reports no targeted/industrial fishery as exemption from Rec. 19-05.	Task 1 and 2 submitted for catches. Ghana available to implement management measures.	30/07/2022
Category C			
<i>MCS- species related</i>			
<i>MCS- general : Port Controls</i>	Rec. 16-14: No scientific observer programme.	Section 2 of Annual Report indicated the implementation of a national observer program of a 100% coverage. Data recorded in MS Excel format. A unified system/software needed to integrate data collected for processing requirements needed in data submission (Section 5, Annual Report).	30/07/2022

<i>Vessel Controls</i>			
OTHER			
Response to COC Chair letter from previous year?			

Guatemala, September 2022

Discrepancies in reported catches for 2020

As regards matters related to compliance with ICCAT Recommendations 11-11/16-16, in particular the differences between Task 1 data and the compliance tables submitted by Guatemala (COC_308B_SPA.xlsx), we would hereby like to inform of the following:

Guatemala has traditionally used the European procedure of sampling and estimation (known as T3) for the adjustment of species composition and sizes of catches declared by its industrial purse seine fleet. Consequently, the data reported to ICCAT for Task 1 and Task 2 for the entire historical period reflect the result of these estimates. Therefore, the bigeye tuna catch limits allocated to Guatemala and effective from 2020, in accordance with ICCAT Recommendations 19-02, 20-01 and 21-01, are based on the best estimate of scientific bigeye tuna catch, which is the product of the procedure referred to above.

In order to maintain the consistency between the data reported in Task 1, used to calculate catch limits, and the catches monitoring scheme established since 2020, Guatemala has been temporarily using the best scientific estimate as a basis to control the consumption of bigeye tuna catches by its fleet. Accordingly, we would like to confirm that the tropical tuna catches reported in Task 1 and the compliance tables¹ should be considered Guatemala's official catches for the period 2020-2022, in particular regarding monitoring of bigeye tuna catch limits. The differences between tropical tuna catch data in CP50² and Task 1 catches arise from adjustments made at year end due to incorporation of all the in-port sampling information and landings of the Guatemalan purse seine fleet.

As for discrepancies in the catches reported in Guatemala's 2021³ Annual Report, which includes 2020 catches, the reported catches do not correspond with Task 1 data, and must therefore be replaced by these data. However, we inform that Guatemala has started a process to review its historical catch, for which information on catches in all available documents (logbooks, landing, sales note) will be compared with the results of scientific estimates; and it will be determined to what extent the catches reported to ICCAT in recent years must be corrected. The review process is based on some discrepancies identified between the estimate of best scientific catch and information on catches by species in the sales note, throughout the historical series, which could indicate bias in Guatemala's Task 1 catches. This bias is not exclusive to Guatemala and is consistent with that reported to ICCAT by Herrera and Báez in 2018⁴ in a study that reviewed the purse seine fleet catches of various countries in the Indian and Atlantic Oceans.

Finally, I would also like to inform that Guatemala is working with other countries in the Central America region, within OSPESCA, to improve monitoring and control systems for its fleets. The initial phase of this project will consist of developing a centralized fishing reporting system, which integrates all the available fishing information. The details of this project as well as the results of the historical catch review will be reported at a future date to ICCAT.

¹ Doc. No. COC_304 / 2021. 2020 COMPLIANCE TABLES RECEIVED IN 2021 (COC_304_2021-COMM.pdf)

² Bigeye tuna catches reported by Guatemala in CP50 (COC_303_Table_1_Monthly_Quarterly_TROP_Catches_2020.xlsx)

³ Doc. No. COC_301 /2021, GUATEMALA'S ANNUAL REPORT, page 387 (COC_301_TRI.pdf)

⁴ [ResearchGate](#)

Compliance letter response template

2021 Commission Meeting			
CPC: GUATEMALA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE 2021 MEETING	DATE MISSING DATA/INFORMATION SENT (if applicable)
Category A			
<i>Compliance Tables</i>	Rec. 11-11 and Rec. 18-07: Compliance tables received late (2021-08-21). Some discrepancies in the historical data between compliance tables and Task 1	As regards Rec. 11-11 and Rec. 18-07: Compliance tables received late (2021-08-21), attached at a later date due to a delay in information consolidation. For the current year, the information was submitted on time. As regards some discrepancies in historical data between compliance tables and Task 1, see note appended to this document, Discrepancies in reported catches for 2020.	
<i>Capacity, size, gear, time, area restrictions</i>			
Category B			
<i>Annual Report</i>			
<i>Statistical Data</i>			
<i>Other reports</i>	Rec. 18-05: Billfish check sheet received late (2021-09-17) and it is reported that there is no targeted/industrial fishing as an exemption for Rec. 19-05, which is not a valid response. Prohibits discards of dead fish but does not cite the law/mechanism to prevent marlins from entering trade	As regards Rec. 18-05: Billfish check sheet received late (2021-09-17), attached at a later date due to a delay in information consolidation. For the current year, information was submitted on time. As regards it is reported that there is no targeted/industrial fishing as an exemption for Rec. 19-05, which is an invalid response. Prohibits discards of dead fish but does not cite the law/mechanism to prevent marlins from entering trade.	

		In this regard, I would like to inform that the criterion set out in Article 11 of the FAO Code of Conduct Code for Responsible Fisheries is used, since these species are not targeted. In the case where some species associated with the target fishery are taken as bycatch, these are not traded under any circumstances. They are landed locally in African ports where they represent an additional source of protein and contribute to local food safety.	
Category C			
<i>MCS-species related</i>			
<i>MCS-general</i>			
<i>Port Controls</i>			
<i>Vessel Controls</i>			
OTHER			
Response to COC Chair letter from previous year?	Received		

Tegucigalpa, M.D.C.
29 September 2022

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

Dear Mr. Campbell,

I have the pleasure to address you in reference to your "Letter on compliance related issues", of 15 July last, whereby you inform of the concerns expressed by the Commission regarding the reporting deficiencies of my country, within the context of compliance with the formal requirements on data provision.

Honduras would like to inform the Commission and give assurances that my country is aware of the need to maintain the standards of compliance provided for in the recommendations adopted, and undertakes to immediately improve processes. The circumstances of change in authorities are no excuse; we recognize that our obligation to improve must take precedence over any difficulty that may have occurred. Therefore, it is our strict decision to ensure that, once our performance review has been carried out, Honduras will maintain as from 2023 a proper record of compliance.

Specifically, in relation to the aspects that you have noted in the correspondence referenced above, we would like to state the following:

- a. We recognize that both last year's and this year's Annual Reports were not received on time. After receiving your correspondence last July, we initiated a comprehensive review process which has led us to adopt concrete decisions for improvement. In this regard, having recognized that it is important to submit reports on time, even in the case of zero catch, we assure you that the circumstances described will not occur in the foreseeable future.
- b. Our review included statistical data, which is precisely why, in parallel, we have issued instructions for design and implementation of a catch and data processing scheme in line with the quality, accuracy and timeliness required ICCAT.
- c. What is set out the preceding lines also applies to the Billfish and Shark Check Sheets. These documents have been submitted with updated information, and taking into account the observations made by the Commission. Consequently, the interpretation that had been developed by my delegation has been improved upon.

Please find attached, in the corresponding format, our response to your request.

We reiterate our attentive and consistent will to participate in the management work, in accordance with the best standards of compliance.

Sincerely,

Engineer Elder Armando Romero Moreno
General Director of Fisheries and Aquaculture

cc. Dr Laura Suazo/Secretary of State, Agriculture and Livestock Offices

Compliance letter response template

2021 Commission Meeting			
CPCs: HONDURAS			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE THE 2021 MEETING	DATE MISSING DATA/INFORMATION SENT (if applicable)
Category A:			
<i>Compliance Tables</i>			
<i>Capacity, size, gear, time, area restrictions</i>			
Category B:			
<i>Annual Report</i>	Annual Report received late (2021-09-23)	An interdisciplinary compliance team was set up internally. This team has concluded its report and will ensure timely compliance as from January 2023.	
<i>Statistical data</i>	Task 1 (zero catches) received late.		
<i>Other reports</i>	Recs. 18-05 and 18-06: Check Sheets received late (2021-10-01) Requests the exemption of requirements regarding billfish and sharks, citing that they do not have a direct/industrial fishery, which is an invalid response and indicated N/A for the requirement of landing limits for marlins in the Billfish Check Sheet, which is an incorrect response.	<ol style="list-style-type: none"> 1. An interdisciplinary compliance team was set up internally. This team has concluded its report and will ensure timely compliance as from January 2023. 2. The process to understand the requirements was improved and an exemption from billfish requirements is not requested in 2022. 3. Clarification that Honduras does implement the limit on landings of marlins. 	
Category C:			
<i>MCS-species related</i>			

<i>MCS-general:</i>			
<i>IN-PORT control</i>			
<i>Vessel controls</i>			
OTHERS	No response to COC letter.	A response has been provided to the COC letter. Honduras reiterates its will to comply with both formal and substantive obligations. Honduras has implemented an improvement plan for the obligations in both categories. It has not activated or promoted activation of fisheries in the Convention area nor will do so until the improvements are fully implemented.	
Response to COC Chair letter from previous year?	No.	We would like to apologize to the Compliance Committee Chair and the Commission and Honduras reiterates its commitment to compliance within the framework of the improvement plan which it has been agreed will be implemented at national level.	

Compliance letter response template

2021 Commission Meeting			
CPC: LIBYA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE 2021 MEETING	DATE MISSING DATA/INFORMATION SENT (if applicable)
Category A			
<i>Compliance Tables</i>	Discrepancies between Compliance tables and Task 1 data	Need more clarifications on discrepancies. Considering that the numbers used are generated from eBCD system and a comparison between eBCD final numbers vs total catches.	
<i>Capacity, size, gear, time, area restrictions</i>			
Category B			
<i>Annual Report</i>			
<i>Statistical Data</i>	Statistical data received late; no size data received.	Task 2 was not submitted due to difficulties in gathering related data.	
<i>Other reports</i>			
Category C			
<i>MCS- species related</i>	Rec. 19-04: List of designated ports received late	Was submitted late due to misunderstanding for the submission date.	Sent on 28/09/2021.
<i>MCS- general: Port Controls</i>	Rec. 16-14: No scientific observers deployed (according to AR: Not Applicable – BFT caught live and transported to other farming CPCs – this is an impermissible basis for determining non-applicability).	According to Rec. 16-14 scientific observers were deployed and cover all support and towing vessels. This was the first time that trained Libyan national observers were onboard. In Libyan AR (NA) status was entered mistakenly.	

<i>Vessel Controls</i>	Rec. 19-04 and 18-09: Three infractions reported under the JIS, including possible non-compliance with para 15 of Annex 7. Control transfers carried out much later than event reported	Para 15 of Rec. 19-04 is defining the collaborations between countries in Inspection. CPC Libya was collaborated and the control transfer was carried out late due to bad weather conditions.	The date of the incident: 09/07/2021 Date of requesting control transfer: 12/07/2021 Date of control transfer: 21/07/2021
OTHER	ROP-BFT: PNCs contained in COC-305. Some deployment requests and payments for observer coverage received late	Only one vessel has filled in the deployment request form late and that was because of changing for some vessels in the due time for submission.	
Response to COC Chair letter from previous year?	Received		

Managua, 29 September 2022
DG/EJA/227/09/2022

Mr. DEREK CAMPBELL
Compliance Committee Chair
International Commission for the Conservation of Atlantic Tunas (ICCAT)

Dear Mr. Campbell,

I would like to refer to your communication of 15 July 2022 and to the reminder sent out yesterday on 27 September 2022.

Firstly, we would like to apologise for late submission of our information which essentially consists of informing that Nicaragua currently has zero catch, given that to date it does not have a fleet operating in the Convention area.

We would also like to comment on the response to your 2021 letter. Given that we have reported zero catch, we have assumed that it was not necessary to provide the same information in all the other documents. However, from now on, we will complete each of the documents required of us, and submit these by the dates indicated. Last year's annual report as well as the billfish and shark check sheets were submitted late for the same reason.

We request that this communication be considered as the response to your 2021 communication.

It is important to indicate that it is widely known by the Secretariat and Commission staff that Nicaragua does not have any registered fishing vessel operating in the Convention area, and that our reports indicate and confirm zero catch, which should not cause any serious difficulties in the work of your Committee and of the Commission in general.

Please find attached the model submitted in Word format with the information requested.

Nothing further,

Regards,

Edward Jackson Abella
Director General
Nicaraguan Institute of Fisheries and Aquaculture

Compliance letter response template

2021 Commission Meeting			
CPC: NICARAGUA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE 2021 MEETING	DATE MISSING DATA/INFORMATION SENT (if applicable)
Category A			
<i>Compliance Tables</i>		It was instructed to comply with the submission dates established by ICCAT.	They were submitted by email as they could not be sent through the IOMS system.
<i>Capacity, size, gear, time, area restrictions</i>		It has been confirmed that Nicaragua has zero catch, as we do not have a fleet operating in the Convention area.	Reported through the IOMS system.
Category B			
<i>Annual Report</i>	Annual Report received late (2021-11-15)	It was instructed to comply with the submission dates established by ICCAT.	It was submitted on 14 September of the current year.
<i>Statistical Data</i>			
<i>Other reports – shark and billfish check sheets</i>	Rec. 18-05 and Rec. 18-06: Billfish and shark check sheets received late.	Submitted through the IOMS system.	It has been confirmed that Nicaragua has zero catches, since we do not have a fleet operating in the Convention area.
Category C			
<i>MCS- species related</i>		It has been confirmed that Nicaragua has zero catch through the IOMS system.	Reported on 22 September.
<i>MCS- general: Port Controls</i>		It has been confirmed that Nicaragua has zero catch through the IOMS system.	Reported on 22 September.
<i>Vessel Controls</i>		It has been confirmed that Nicaragua has zero catch through the IOMS system, since we do not have a fleet operating in the Convention area.	Reported on 22 September.
OTHER			
Response to COC Chair letter from previous year?	No response to the Compliance Committee letter.	It will be sent on 29 September of the current year.	

PANAMA AQUATIC RESOURCES AUTHORITY GENERAL ADMINISTRATION

Panama, 10 September 2022.
AG-844-2022

Mr. Camille Jean Pierre Manel Executive Secretary
International Commission for the Conservation of Atlantic Tunas

I have the honour to address you and I extend my greetings to you. I would also like to respond to the letter on compliance with conservation and management measures of the reporting requirements for the assessment period 2021.

As explained above and in relation to the observations on the late delivery for compliance with the measures established in Rec.11-11, Rec. 18-05, Rec.18-06, Rec.19-02 paragraph 1, Rec. 16-05, Rec. 16-14 and the late and incomplete statistical data, I refer you to the attached compliance letter response template. I also take this opportunity to submit the billfish and shark check sheets.

Please accept the assurances of my highest consideration,

(signed and sealed)

Flor Torrijos
General Administrator

Appendix 1

Compliance letter response template

2021 Commission Meeting			
CPC: PANAMA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE 2021 MEETING	DATE MISSING DATA/INFORMATION SENT (if applicable)
Category A			
<i>Compliance Tables</i>	Rec. 11-11: Compliance tables received late. Overharvest of southern albacore	On course to comply with the established deadlines for submission of the compliance reports, we apologize for late submission of the reports. Please note we are making best efforts to be able to comply in due time. We also welcome the opportunity to submit these reports. As for the overharvest of southern albacore the necessary measures will be taken so that the fleet pays back the overharvest in scheduled quotas which will be established for 2023 and 2024.	
<i>Capacity, size, gear, time, area restrictions</i>			
Category B			
<i>Annual Report</i>	Annual Report received late (2021-11-14)	On course to comply with the established deadlines for submission of the compliance reports, we apologize for late submission of the reports. That corresponding to 2022 will be submitted by the established deadline.	

<i>Statistical Data</i>	Statistical data received late. No fleet characteristics data received.	On course to comply with the established deadlines for submission of the compliance reports, we apologize for late submission of the reports. Please note we are making best efforts to be able to comply in due time. We also welcome the opportunity to submit the pending report.	Report on fleet characteristics sent on 5/08/2022
<i>Other reports</i>	Rec. 18-05 and Rec. 18-06: Billfish and shark check sheets received late	The appropriate remedial action has been taken for timely submission of the billfish and shark check sheets.	
	Rec. 19-02 para 13: Some Task 1 data on tropical tunas submitted for 2020, but without the corresponding quarterly reports	Structured and systemisation processes are currently being developed for review and timely submission of the corresponding reports.	
	Rec. 16-15: Transshipment reports received late	The appropriate remedial action has been taken for timely submission of the transshipment reports.	Report sent on 2022/09/08
Category C			
<i>MCS-species related</i>			
<i>MCS-general</i>	Rec. 16-14: It is not clear if the 5% observers coverage was reached; submitted in ST09, but coverage not indicated.	We do not have operational programmes for 2020 with 5% coverage for the longline fleet.	

<i>Port Controls</i>			
<i>Vessel Controls</i>	Rec. 18-08: A vessel on the IUU list.	No vessels on the IUU fishing list.	
OTHER			
Response to COC Chair letter from previous year?	No response to the COC letter.	On course to comply with the established deadlines for submission of the compliance reports, we apologize and will proceed to reply to the COC letter.	

Compliance letter response template

2021 Commission Meeting			
CPC: SENEGAL			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE 2021 MEETING	DATE MISSING DATA/INFORMATION SENT (if applicable)
Category A			
<i>Compliance Tables</i>	Some inconsistencies in historical data between the compliance tables and Task 1. Overharvest of bigeye tuna in 2020.	Action for consistency between compliance table and Task 1 data. Partial repayment of bigeye tuna in 2021 and the remainder in 2022/2023.	30/09/2022
<i>Capacity, size, gear, time, area restrictions</i>			
Category B			
<i>Annual Report</i>			
<i>Statistical Data</i>			
<i>Other reports</i>	Rec. 18-05 and 18-06: check sheets received after established deadlines (29 September / 1 October 2021).	Remedial action to improve data submission by the deadlines in 2022.	
Category C			
<i>MCS- species related</i>	MCS data for 2020 submitted late (20 October 2020 for the first semester and 1 September for the second semester). Apparent inconsistency between the reported North swordfish catch (10 t) and North swordfish exported to a single CPC (311 t), which also indicates a potential overharvest of North swordfish (quota: 225 t).	Improvement in deadline submission in 2022. Exports of swordfish are the result of transshipment activities and the products were fraudulently certified. No overharvest of North swordfish.	
<i>MCS-general: Port Controls</i>	Rec. 16-14: Scientific observers programme not yet implemented.	Still ongoing.	
<i>Vessel Controls</i>	A vessel included in the IUU list.	This vessel is not flagged to Senegal.	
OTHER			
Response to COC Chair letter from previous year?	No response to COC letter.	Submission of response by the established deadline.	30/09/2022

**GOVERNMENT OF ST. VINCENT AND THE GRENADINES
MINISTRY OF AGRICULTURE, FORESTRY, FISHERIES,
RURAL TRANSFORMATION, INDUSTRY AND LABOUR**

29th September, 2022

Compliance Committee Chair
ICCAT Secretariat
Corazon de Maria, 8-28002 Madrid Spain

Dear Mr. Campbell,

With reference to your letter of 15th July, 2022, subject, "Letter on compliance issues." St. Vincent and the Grenadines (SVG) remains committed to fulfilling its obligations as a contracting party to ICCAT and will make every effort to correct issues as they arise. St. Vincent and the Grenadines acknowledges the validity of the issues presented as well as the need to send information with enough time for analyses by the relevant committees.

The Fisheries Division recognises the limitations of not operating with a full staff compliment. St. Vincent and the Grenadines has faced severe economic setbacks in the past few years particularly due to reasons such as the Covid-19 pandemic, cyclonic weather and several eruptions of the La Soufriere volcano in 2021, among others. These events led to increased economic decline not just through physical injury and damage to property but also by disrupting workflow and efficiency. This economic decline caused the Government to be reluctant to hire or replace staff (particularly medium to high-level technical staff) in various segments of the public service. Nonetheless, despite these limitations, the Fisheries Division constantly tries to improve its efficiency.

St. Vincent and the Grenadines acknowledges the possibility that no ST01 Form was sent to ICCAT as indicated in the letter. The Task I fleet characteristics data was prepared, unfortunately, an abrupt departure of one of the key members of staff working on the form along with another key person taking vacation leave around the time of the form's completion may have led to confusion and oversight in regards to the sending of the correct ICCAT form. The fact that a CP01 Form was sent around the same time, may have added to the confusion, particularly due to the similarity in content between the two forms.

It is regrettable that the Compliance Reporting Tables were received late and the quarterly reports were not completed. These reports will be completed and sent at a future date. St. Vincent and the Grenadines also recognises the over harvesting of white marlin, and will therefore improve its efforts in the implementation of measures for the protection of this and other ICCAT managed species.

Due to the onset of the Covid-19 pandemic, St. Vincent and the Grenadines was no longer deploying Scientific Observers and at one point, the Government prohibited the travelling of public sector workers as a safety measure. This is in keeping with a similar measure by the Consortium where ROP Observers would be deployed only where possible due to COVID-19 restrictions and where the decision whether or not to deploy observers will be considered on a case-by-case basis dependent on the observers' ability to travel and board the vessel (ICCAT CIRCULAR # 1829/2020). Further, the Secretariat informed CPCs that observer deployment under the ROP Transshipment may be suspended due to force majeure.

Unfortunately, information on a similar position taken by SVG as a CPC was not relayed to ICCAT. SVG uses this opportunity to declare the reason for no observer deployment was due to a suspension of the National Observer Programme due to the various restrictions associated with the Covid-19 pandemic. With the changing dynamics involving Covid-19, this position is being reconsidered.

Regards,

Nerissa Gittens (Ms.)
Permanent Secretary
Ministry of Agriculture, Forestry, Fisheries,
Rural Transformation, Industry and Labour

Compliance letter response template

2021 Commission Meeting			
CPC: ST. VINCENT AND THE GRENADINES			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE 2021 MEETING	DATE MISSING DATA/ INFORMATION SENT [IF APPLICABLE]
Category A			
<i>Compliance Tables</i>	Rec 11-11 and 16-16: Compliance Tables Received late [30 Sept 2021)	Requests were made for an increase in Fisheries Division staff. Other strategies are being devised to increase efficiency.	N/A
<i>Capacity, size, gear, time, area restrictions</i>			
Category B			
<i>Annual Report</i>			
<i>Statistical Data</i>	No Task I fleet characteristics data received	This was due to a potential oversight/confusion. This is being remedied by increased vigilance. Requests were made for an increase in Fisheries Division staff. Other strategies are being devised to increase efficiency.	N/A
<i>Other reports</i>	-Rec 18-05 and 18-06. Check sheets submitted late [30 th Sept 2021] -Rec 19-02 para 13. Quarterly/monthly reports for 2020 incomplete [sent to June 2020 inclusive]	Requests were made for an increase in Fisheries Division staff. Other strategies are being devised to increase efficiency.	-N/A -Quarterly reports to be sent.
Category C			
<i>MCS- species related</i>			
<i>MCS- general: Port Controls</i>	Rec. 16-14. No scientific observers deployed in 2020.	This was due to restrictions associated with the Covid-19 pandemic.	N/A
<i>Vessel Controls</i>			
OTHER			
Response to COC Chair letter from previous year?	No reply to COC letter.	This was perhaps due to an oversight that is being remedied with increased vigilance. Requests were made for an increase in Fisheries Division staff. Other strategies are being devised to increase efficiency.	

**GOVERNMENT OF THE REPUBLIC OF TRINIDAD AND TOBAGO
MINISTRY OF AGRICULTURE, LAND & FISHERIES
Fisheries Division**

30 September 2022

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 15 July 2022 which seeks a reply from Trinidad and Tobago on the following compliance deficiencies noted by the Compliance Committee:

- Rec. 11-11 and Rec- 19-05: Overharvest of WHM
- Annual Report received late (17 September 2021)
- Rec. 18-05 and 18-06: Billfish and Shark Check Sheets received late (1 Oct 2021)
- Rec. 16-14: No scientific observer programme

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

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

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

Yours sincerely,

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

Compliance letter response template

2021 Commission Meeting			
CPC: TRINIDAD AND TOBAGO			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE 2021 MEETING	DATE MISSING DATA/INFORMATION SENT (if applicable)
Category A			
<i>Compliance Tables</i>	Rec. 11-11 and Rec- 19-05: Overharvest of WHM	Trinidad and Tobago's 2016 overharvest of WHM, 79.2 t, was reduced to 4.2 t in 2021. Over the period vessel owners were advised that the species should not be landed and the Fisheries Division prohibited export via the Trade Ordinance process. The 2022 adjusted landings limit is 10.44 t.	15 August 2022 (TTO Compliance Tables) 15 September 2022 (Annual Report, Section 3) 24 September 2022 (Annual Report, Section 4)
<i>Capacity, size, gear, time, area restrictions</i>			
Category B			
<i>Annual Report</i>	Annual Report received late (17 September 2021)	It is a challenge for Trinidad and Tobago, and the Fisheries Division in particular, to keep abreast with the implementation and compliance of ICCAT conservation and management measures, including reporting requirements, as a result of the Division's current human resource capacity constraints. Some context and details were provided in the 2022 Annual Report.	17 September 2021 24 September 2022 (Annual Report, Section 5)
<i>Statistical Data</i>			
<i>Other reports</i>	Rec. 18-05 and 18-06: Billfish and Shark Check Sheets received late (1 Oct 2021)	See comment with respect to Annual Report above.	1 October 2021 24 September 2022 (Annual Report, Section 5)
Category C			

<i>MCS- species related</i>			
<i>MCS- general: Port Controls</i>	Rec. 16-14: No scientific observer programme	Resulting from the need under multiple fora to implement conservation and management measures for the non-artisanal longline fleet in the absence of adequate legally binding national measures, vessel owners, incentivised by the desire to secure the fleet's trade market, have agreed to voluntarily comply with and implement regulatory measures by 2023 including an Observer Programme. One trial Observer-monitored trip was completed in September 2022 as a fact-finding mission. It is recognised, however, that several of Trinidad and Tobago's non-artisanal longliners may not be equipped to accommodate Observers and thus preliminary talks have begun between the vessel owners and the Fisheries Division on the implementation of an Electronic Monitoring System (EMS) for such longliners. Onboard camera systems have been identified on two vessels thus far.	24 September 2022 (Annual Report, Section 2)
<i>Vessel Controls</i>			
OTHER			
Response to COC Chair letter from previous year?	Received		

Compliance letter response template

2021 Commission Meeting			
CPC: UK			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE 2021 MEETING	DATE MISSING DATA/INFORMATION SENT (if applicable)
Category A			
<i>Compliance Tables</i>			
<i>Capacity, size, gear, time, area restrictions</i>			
Category B			
<i>Annual Report</i>			
<i>Statistical Data</i>			
<i>Other reports</i>	Rec. 18-05 and 18-06: Billfish and shark check sheets received late (1 Oct 2021)	<p>In 2021 the UK had initially believed that we would not have to resubmit the shark and billfish check sheets as there had been no change to the information provided in the check sheets submitted previously in respect of the UKOTs.</p> <p>However, we were informed via written correspondence that as Met UK and the UKOTs were now represented as a combined seat, and thus considered a new CPC, there was a requirement to submit them afresh. Having been alerted to this we took prompt action to submit the check sheets in order to meet the requirement.</p> <p>For 2022 governance has been put in place to ensure that the check sheets are submitted in a timely manner.</p>	1 October 2021
Category C			
<i>MCS- species related</i>			
<i>MCS-general: Port Controls</i>	Rec. 16-14: Unclear if 5% observer coverage is being reached (see AR for more information). ST09 submitted with no data.	Met UK: In 2021 Met UK did not meet the 5% observer coverage requirement for Met UK vessels fishing for North Atlantic albacore.	

		<p>Being aware that Met UK did not meet the minimum ICCAT standard for observer coverage, we have taken steps to ensure sufficient levels of coverage in 2022, including making embarkation of an observer for at least 5% of fishing activity a condition of being issued with a license to fish North Atlantic albacore.</p> <p>UKOTs: In 2021 Saint Helena met the observer requirements. There were 651 commercial fishing trips in total, with 34 of these trips having had a local scientific observer on board (5.2%).</p> <p>Due to the small size of the fishing vessels in the small-scale fleet of Bermuda, there is insufficient space to accommodate observers on board. Bermuda does not have a national observer programme, although an electronic monitoring system is being trialed on the longline vessel.</p> <p>BVI and TCI do not currently have the capacity or the resources to implement a domestic observer programme. However, TCI is receiving assistance to improve its fisheries management capabilities via the Blue Belt programme, which is being implemented to support the UKOTs with the protection and sustainable management of their marine environments.</p>	
<i>Vessel Controls</i>			
OTHER			
Response to COC Chair letter from previous year?	Not applicable		

August 12, 2022
No.22/32

Mr. Derek Campbell Compliance Committee Chair
International Commission for the Conservation of Atlantic Tunas C/ Corazón de María, 8-6th floor,
28002 Madrid, Spain

Subject: Response from Chinese Taipei to the Letter on Compliance Issues

Dear Mr. Campbell,

Thank you for your letter dated 21 July 2022 regarding the possible reporting deficiencies for North Atlantic shortfin mako sharks (N-SMA). In response to your concern, I would like to provide more information on how Chinese Taipei implements the reporting requirements set forth in Rec. 19-06 and actions taken to correct the deficiencies.

Considering the stock status of the N-SMA, Chinese Taipei has prohibited its tuna longline fleet operating in the ICCAT Convention area from retaining N-SMA since 2018. Nevertheless, to contribute to the stock assessment of N-SMA, our fishermen are still required to record in the logbook the numbers discarded dead and released alive in accordance with Article 42 of the Regulations for Tuna Longline Fishing Vessels Proceeding to the Atlantic Ocean for Fishing Operation¹. In addition, we have continued carrying out the national observer program to collect fishery-related data in this regard.

Since the N-SMA hooked are oftentimes cut off the lines when brought alongside the vessel, the numbers discarded/released as recorded in the logbook do not indicate the status of N-SMA, and are therefore categorized as dead discards when we submit the TASK 1 data, giving rise to the issue of lack of live releases as noted during the 27th Regular Meeting. However, the dead discards and live releases recorded by our observers have been duly submitted to ICCAT pursuant to paragraph 10 of Rec. 19-06. According to the data reported through the logbook and observer program, the interactions between our longliners and N-SMA concentrate in the area 5°N - 10°N and 25°W - 40°W (as shown in **Figure 1** below).

Taking due note of the deficiency and for the purpose of fulfilling the reporting requirements under Rec. 19-06 as well as Rec. 21-09, we have estimated the live releases and dead discards of N-SMA based on the observer data. The methodology for estimating and the estimates were submitted to ICCAT/SCRS before 31 July 2022, as part of the annual TASK 1 and TASK 2 data submission. In the future, this methodology will be used, pending the approval and possible suggestions from the SCRS, for providing the estimates of N-SMA live releases and dead discards in TASK 1.

With the above explanation and corrective actions taken by Chinese Taipei, it is sincerely hoped that the issue of implementing the mandatory reporting requirements would be resolved. We also hope that the Compliance Committee and the Commission could recognize our efforts and longstanding commitments in cooperating with ICCAT and accordingly continuously grant Chinese Taipei the Cooperating Status as before.

Sincerely yours,

(signed)

Ding-Rong Lin
Head of Chinese Taipei Delegation to ICCAT

¹ Article 42 - Any seabird, sea turtle, whale shark, cetacean, penguin or prohibited species promulgated by the competent authority incidentally caught by any tuna fishing vessel shall be released when caught alive or discarded dead, and the number(s) be duly recorded on the logbooks and the E-logbook system.

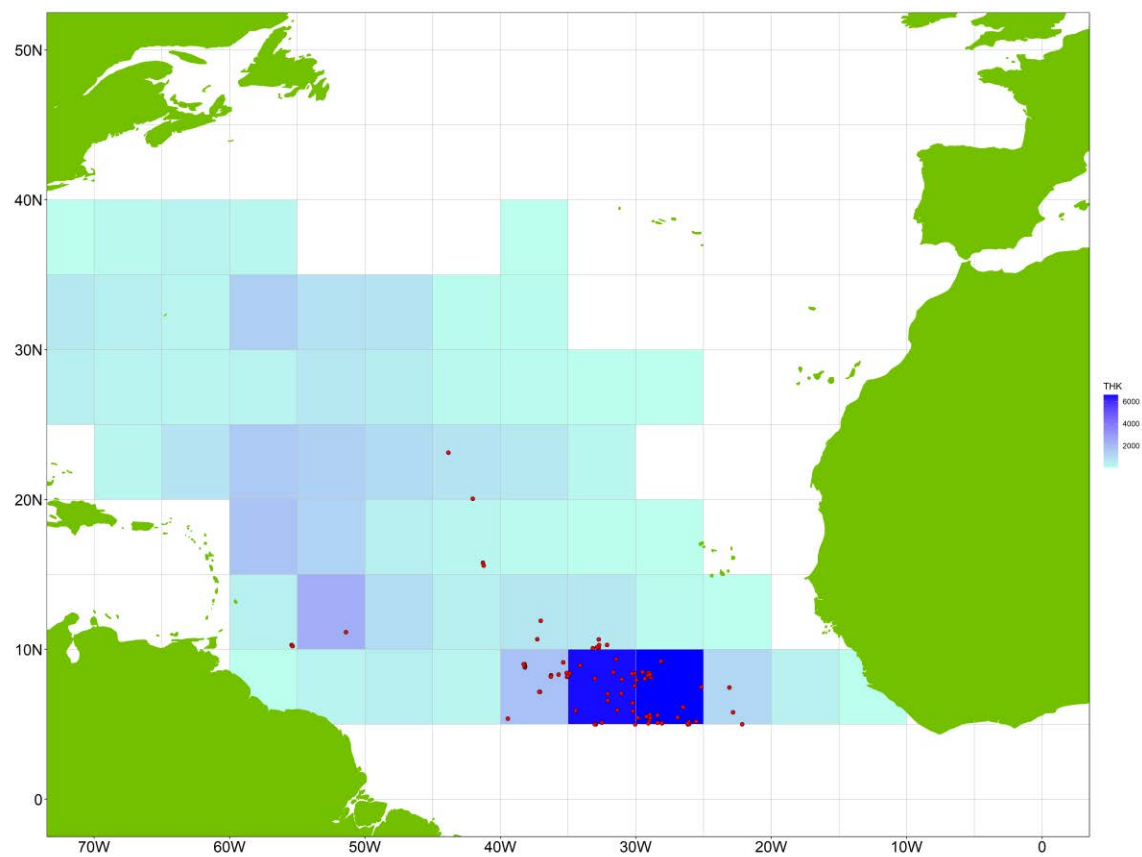


Figure 1. Area of interactions with N-SMA.
(Different shades of blue indicate the effort (THK means thousand hooks), and the red dots indicate the interaction with N-SMA)

Executive Presidency
Office of the Minister of Fisheries and Aquaculture

28 September 2022
INCOPECA-PE- 1006-2022

Mr. Derek Campbell
Compliance Committee (COC) Chair
International Commission for the Conservation of Atlantic Tunas
Madrid, Spain

Dear Compliance Committee Chair,

I have the pleasure to address you in providing a response to your Official Communication No. S-22-05-192/2022-07-25 on the letter of identification of Costa Rica, in accordance with the *Recommendation by ICCAT concerning Trade Measures* (Rec. 06-13).

As you will remember, at the 27th Regular Meeting of the Commission held online in November 2021, Costa Rica effectively recognized its challenges and the need to improve the reporting and implementation processes between the years 2019 and 2020 as well as the errors in interpretation of some requirements of the ICCAT Recommendations, in relation to which our country did not, and does not, for any reason or circumstance, intend to undermine the Commission's work, or the conservation and management measures established by this Regional Fisheries Management Organisation.

From November 2021 to date, the specialist team of this Ministry of Fisheries has committed to working with the support, guidance and advice of the ICCAT Secretariat, on actions that enable us to gradually and progressively introduce the relevant adjustments in the management and to improve compliance with the measures applicable to our fisheries in the Caribbean.

Furthermore, with the best wishes to build capacities, my country has exchanged communications with the ICCAT Department of Science and Research and has participated virtually as a Non-contracting cooperating Party in different meetings which have enabled us to gain insight to comply with the reporting requirements of the Commission. In this regard, the team of professional staff of Costa Rica's Department of Research and Development, have participated in the following meetings in 2022:

- Meeting of the Working Group on Stock Assessment Methods (WGSAM), 31 May-3 June.
- Second Meeting of the Working Group on Electronic Monitoring Systems (EMS), 6-7 June.
- Meeting of the Working Group on Integrated Monitoring Measures (IMM), 8-10 June.
- 2022 ICCAT Atlantic Swordfish Stock Assessment Meeting, online, 20-29 June 2022.
- Intersessional Meeting of Panel 1, held in hybrid format, in the Azores, Portugal, 28-30 June.
- Subcommittee on Statistics and Species Groups Meeting, held from 19-24 September 2022.
- Meeting of the Standing Committee on Research and Statistics, held from 26-30 September 2022.

In terms of compliance with communications, my country submitted this year to the Secretariat the following information within the established deadlines:

- On 28 July 2022 through Official Communication INCOPECA-PE-0806-2022, the following forms were submitted to the ICCAT Secretariat: ST01-T1FC, ST02-T1NC, ST03-T2CE, ST04-T2SZ, ST05-T2CS, ST09-DomObPrg, TG02-CnvEleSurv, TG02-CnvTRERc and TG03-Ele-TRERc.
- On 12 August 2022 through Official Communication INCOPECA-PE-0858-2022 the form CRI_CP-013-COC- _Sec-2022 was submitted to the ICCAT Secretariat.

- On 14 September 2022 through Official Communication PE/OCI-045-2022 the following forms were submitted to the ICCAT Secretariat: 55-CRI_BillCKSheetSPA-2022, 55_CRI_ShkSheet_SPA_2022, CP-44-Bird Mit-Tri_Costa Rica, CP-41-NSWOPIPlan, Annual Report of Costa Rica, 2022 Annual Report ICCAT Circular #066/2022 and 2022 Annual Report ICCAT Circular #1040/2022.

Furthermore, I would like to inform that the Government laid before the Legislative Assembly in April 2022 the draft bill under file number 23.094, titled "Approval of accession of the Republic of Costa Rica to the International Convention for the Conservation of Atlantic Tunas and its Protocol of Amendment to the Convention, adopted on 18 November 2019", which is currently being processed in the Commission of International Relations and Foreign Trade. The aim is for definitive approval in the course of 2023, consolidating our participation in ICCAT as a Contracting Party. From that perspective, my country welcomes this process of issue of alerts by the Compliance Committee and the Commission as constructive and positive, so that our participation in the Commission conforms to the standards that characterize my country, as a country committed to conservation and sustainable use.

Finally, I would like to inform that as a result of the information provided by Costa Rica in 2021 and the necessary adjustments in statistical data collection, the Executive Secretary communicated to us through Circular 1692-2022 of 22 March 2022, the lifting of the prohibition on our country, as a result of our attention to our responsibilities in relation to the Commission.

Please find attached the Compliance letter response template – Costa Rica, duly completed, which we hope satisfies the purpose for which it was issued.

I would like to reiterate the willingness of the Republic of Costa Rica to continue to work with the Compliance Committee, the Secretariat and in general with the Commission, to strengthen the Commission.

(signed and sealed)

Heiner Jorge Méndez Barrientos
Minister of Fisheries and Aquaculture
INCOPECA Executive Chair

Compliance letter response template

2021 Commission Meeting			
CPC: COSTA RICA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE 2021 MEETING	DATE MISSING DATA/INFORMATION SENT (if applicable)
Category A			
<i>Compliance Tables</i>	<p>Recs. 11-11 and 18-07: The compliance tables were received late. Indications of catches of northern albacore, northern swordfish (without an allocated quota, but with a reported fleet capacity of 764 t), bigeye, skipjack, yellowfin, blue marlin and blue shark, but the quantities are unknown / have not been reported. Some differences between compliance tables and Task 1. Significant overharvest of swordfish and blue marlin.</p>	<p>A special programme for attention and improvement in ICCAT obligations. As a result of this, for 2022 the compliance tables were submitted by the deadlines established by ICCAT. The information on amounts of tons was submitted in the ST02-T1NC and CP13-COC forms. In the case of North Atlantic swordfish in 2022, the updated plan was submitted and the scientific paper SCRS/2022/047 was submitted to the SCRS, which was received by the SCRS and is available on the ICCAT website. The ICCAT Department of Statistics was consulted to clarify the differences in data between the compliance tables and Task 1 because these differences cannot be identified. Costa Rica recognizes the signalling of overharvest of swordfish and blue marlin. And based on the above, two scientific papers on these and other species that have been targeted since 1999 for national consumption have been submitted to the</p>	<ol style="list-style-type: none"> 1. Billfish, sharks and birds tables were submitted on 14 September 2022. 2. The form ST02-T1NC was submitted on 29 July 2022. 3. The form CP13-COC was submitted on 12 August 2022. 4. The North Atlantic swordfish management plan was submitted on 14 September 2022. 5. The scientific paper SCRS/2022/047 (Review of historical statistics of swordfish (<i>Xiphias gladius</i>) landings) was submitted by the Medium Scale Fleet in the Costa Rican Caribbean on 11 March 2022. 6. An email enquiry was made on 12 September 2022 regarding the differences in data between the compliance tables and Task 1. 7. The scientific paper SRCS/2022/161 (Historical reconstruction of catches of ICCAT species taken by the longline fleet in the Costa Rican Caribbean between 1999 and 2020) was submitted on 7 September 2022.

		SCRS (SCRS/2022/047 and SCRS/2022/161).	
<i>Capacity, size, gear, time, area restrictions</i>			
Category B			
<i>Annual Report</i>	Annual report received late (2021-09-24).	The 2022 annual report (2021 data) was submitted by the established deadline.	Annual Report submitted on 14 September 2022.
<i>Statistical Data</i>	Res. 66-01; Recs. 05-09 and 11-15: Statistical data received late and Task 1 incomplete, catch data not included. They could not be processed. Task 2 data not received.	The 2022 statistical data were provided by the established deadline. A roadmap for design of an onboard observer programme (human observer and electronic monitoring) is currently being improved. The design of this programme is being developed. In 2022, the use of forms was implemented (logbook, record of sets, transhipment sheet) for fisheries data collection by the masters. This is supplemented by a landing inspection form.	Statistical data submitted on 29 July 2022. The data collection forms started to be implemented by the masters from 4 May 2022. It is intended that the roadmap and the design of the onboard observer programme will be ready for 2023.
<i>Other reports</i>	Rec. 18-06: Shark check sheet received late (2021-09-21).	In 2022, the shark check sheet was submitted by the established deadline.	The shark check sheet was submitted on 14 September 2022.
Category C			
<i>MCS-species related</i>	Rec. 17-02 para 5: North Atlantic swordfish fishing / management plan received late. Recs. 10-09 and 13-11: The response regarding sea turtle bycatch measures does not seem relevant.	In 2022 the Atlantic swordfish fishing / management plan was submitted by the established deadline. Costa Rica has been implementing good practices for handling and release of turtles, as detailed in the Annual Report submitted in 2022. Furthermore, a training programme is being developed in the form of a mandatory	The North Atlantic swordfish fishing / management plan was submitted on 14 September 2022. The Annual Report was submitted on 14 September 2022. It is intended that the training programme, in the form of a sea turtle handling and release course will be ready for 2023.

		refresher course on sea turtle handling and release techniques aimed at masters and crew.	
<i>MCS- general: Port Controls</i>	Rec. 16-14: The scientific observers programme has not been implemented.	A review is currently being carried out for approval of a roadmap for the design of an onboard observer programme (human observer and electronic monitoring). The design of this programme is being developed. In 2022, the use of forms was implemented (logbook, record of sets, transhipment sheet) for fisheries data collection by masters. This is supplemented by a landing inspection form.	
<i>Vessel Controls</i>			
OTHER	Rec. 11-15: Letter of prohibition for all species sent in 2021; given that the catch data have not been sent (Task 1 form with the note: required data not available), the prohibition has not been lifted.	Costa Rica respectfully received the alert and recognised the existence of reporting deficiencies, however, at that date, it had already been working with the ICCAT Department of Statistics to improve information and data provision. Based on this, a communication was received from the Secretariat (Circular 1692/2022) with the lifting of the prohibition for all species. On submission of Task 1 data, it was notified that the prohibition on Costa Rica was lifted.	The Circular 1692/2022 was received on 22 March 2022.
Response to COC Chair letter from previous year?			

Derek Campbell
Compliance Committee Chair
ICCAT Secretariat
Corazón de María, 8. 28002, Madrid
Spain

SUBJECT: RESPONSE TO LETTER TITLED "CONTINUED IDENTIFICATION OF GUYANA UNDER ICCAT REC. 06-13 CONCERNING TRADE MEASURES"

Dear Mr. Campbell,

Guyana confirms receiving the above-mentioned letter, dated 2022-07-15; reference No. S22-05192. We are grateful to you for drawing our attention to these important matters and are pleased to provide you with the ensuing response. We do apologize for the continued significant overharvest of certain ICCAT species, the recurring reporting deficiencies and any inconvenience caused as a result. More specifically, the submission of Guyana's Annual Report, statistical data, and check sheets for shark and billfish species were late (and in some cases, incomplete).

Please note that after our letter to the Tuna operator in August 2021 to discontinue harvesting white marlin (WHM), blue marlin (BUM), and southern swordfish (SWO), we were alerted that the firm has subsequently ceased all fishing activities later in the same month. This development has led to a hiatus in the preparations for the Tuna Scientific Observer Programme. Notwithstanding, this will be included as a license condition/prerequisite for new fishery entrants to avoid a repeat this issue. Please be assured that we have made all feasible steps to rectify the other concerns identified and perhaps this will be clear from 2022 submissions.

As we continue to develop our capacity to improve our reporting to ICCAT, Guyana remains committed to improving our compliance and or reporting as a CPC. In light of this, we are grateful for the patience and support provided by the Compliance Committee and ICCAT Secretariat in this regard.

Please find attached the updated template, which highlights some of the remedial actions taken since the 2021 meeting. Please be in contact if you require further clarifications.

Your truly,

Denzil Roberts
Chief Fisheries Officer

Compliance letter response template

2021 Commission Meeting			
CPC: GUYANA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE 2021 MEETING	DATE MISSING DATA/INFORMATION SENT (if applicable)
Category A			
<i>Compliance Tables</i>	Rec. 11-11, Rec. 18-05 and Rec. 17-03: Continued overharvest of BUM, WHM and SWO Some discrepancies in previous years between Compliance tables and Task 1 data	Following the ceased order issued to the fishing company to discontinue the harvesting BUM, WHM and SWO. Ever since there has not been any active tuna fishery. Met with Carlos Palma via Zoom on January 28. We worked on a file together with remarks. Carlos will finalize the file (with highlights) and share for action by Guyana.	
<i>Capacity, size, gear, time, area restrictions</i>			
Category B			
<i>Annual Report</i>	Annual report submitted late (17 Sept 2021). Some not - applicable answers without explanation	Measures were adopted to correct this. 2022 Annual Report was submitted before deadline.	17 Sept 2021
<i>Statistical Data</i>	Statistical data received late	Measures were adopted to correct this. 2022 statistical data were submitted before deadline.	17 Sept 2021
<i>Other reports</i>	Rec. 18-05 and 18-06: Check Sheets received late (1 Oct 2021)	Measures were adopted to correct this. 2022 Check Sheets were submitted before deadline.	17 Sept 2021 (Guyana pointed out a mistake with the dates in the shared "COC_308_ENG" file)
Category C			
<i>MCS- species related</i>			

<i>MCS- general: Port Controls</i>	Rec. 16-14: No information on or from scientific observer programmes	Plans on implementing a scientific observer program (Rec. 16-14) were put on hold when the sole tuna operator closed fishing operations.	
<i>Vessel Controls</i>			
OTHER			
Response to COC Chair letter from previous year?	Received (Only template)	We apologize for this oversight. A letter will be attached to this template.	