

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

#35 Cipriani Blvd., Newtown, Port of Spain, Trinidad and Tobago, West Indies,
Phone: 623-6028, 623-8525 Fax: 623- 8542

31 October 2022

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

**Subject: Submission from the EU Regarding Possible Non-Compliance with ICCAT
 Conservation and Management Measures – TRINIDAD & TOBAGO**

Trinidad and Tobago (TTO) would like to thank the Secretariat for communicating the submission of the European Union on the above subject, by letter dated 26 July 2022, and for the opportunity to provide clarification on its implementation of Rec 18-09.

Regarding the EU's observation that the AIS data of two vessels that it suggested for IUU listing this year (vessels ISRAR 1 and ISRAR 2) show that these vessels have been able to make calls in Trinidad and Tobago although they were not or no longer on the ICCAT Record of authorized vessels, we submit the following:

1. the vessels ISRAR 1 (which was removed from the ICCAT Record on 15 November 2018) and ISRAR 2 (not listed on the ICCAT Record) last entered the port of Port of Spain in TTO on 26 June 2020 and 10 September 2019 respectively based on observations on the ground. Since then, based on consultation with other national regulatory agencies, in particular, the Maritime Services Division and Customs and Excise Division as well as consultation with regional and international entities engaged in the tracking of vessels, these vessels have not called to port in TTO;
2. as a consequence of inadequate national systems for maritime domain awareness (MDA) and weak interagency cooperation and collaboration to combat illegal, unreported and unregulated (IUU) fishing existent in 2019 and 2020, both vessels were allowed to enter port;
3. since late 2020 TTO's operational capacity and capability have increased through: (1) the use of modern technology in monitoring, control and surveillance (MCS) with the adoption of new and emerging MCS tools such as: (a) AIS analysis tools; (b) Skylight; and (c) more recent efforts towards use of Windward AI, in the fight against IUU fishing; and (2) strengthened cooperation and collaboration among national regulatory agencies at both the policy and operational levels, along with significant support from regional and international entities, that have significantly increased our MDA;

4. in addition, an increase in digitization at the national level has led to electronic advance arrival declarations being mandated to be submitted at least 48 hours prior to arrival, for all vessels using ports and wharves in TTO which enables time for action in the event of a vessel suspected of IUU fishing activity declaring an arrival at a port;
5. as an interim arrangement, pending establishment of a Fisheries Inspectorate, staff are hired under the Government's Development Programme for *Implementation of an Action Plan to address IUU Fishing in the Ports and Waters under the jurisdiction of TTO* to undertake fisheries MCS duties, with initial focus on non-enforcement MCS activities using modern tools and technology;
6. as a consequence of the above achievements there is decreased likelihood that the two vessels, and any other vessels suspected of or engaged in IUU fishing, can enter the jurisdiction of Trinidad and Tobago in future without detection.

Regarding TTO's implementation of Rec 18-09 – Recommendation by ICCAT on Port State Measures to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing, further to our response of 15 November 2021 and the achievements already articulated above, the following is relevant:


1. the names and contact information of TTO's points of contact for the purpose of receiving notifications pursuant to paragraph 13 and for the purpose of receiving inspection reports pursuant to paragraph 35(b) were transmitted to the Secretariat on 26 September 2022 (the initial submission was on 8 December 2021) and 9 September 2022 respectively;
2. pursuant to paragraph 10(c), TTO provided its list of designated ports to the Secretariat on 8 December 2021 and updated this list on 26 September 2022;
3. review of the Fisheries Management Bill by a Joint Select Committee of the Parliament is continuing;
4. the Ministry of Foreign and CARICOM Affairs is engaged to initiate contact with three States prioritized for negotiation of a Memorandum of Understanding for Collaboration to Prevent, Deter and Eliminate IUU Fishing;
5. inter-agency standard operating procedures (SOPs) are being developed to facilitate full implementation of port State measures beginning with the advanced request for port entry, inspection of a fishing vessel at port and post-inspection port State action; to be further strengthened with updating of SOPs for the transshipment and landing of fish, consistent with recent international development on transshipment under the Food and Agriculture Organization;
6. a national control plan and a national inspection plan are under development with technical assistance and funding from the EU under the *Third PSMA Global Capacity Development Programme Support Project* and *Follow-up Action to the 33rd FAO Committee on Fisheries and Aquaculture*;
7. inter-agency awareness-building as well as cooperation and collaboration in the fight against IUU fishing has been significantly strengthened through the work of the Cabinet-Appointed Committee established to oversee, monitor and report on implementation of the *Memorandum of Understanding for Collaboration in Regulating Fishing, Fishing-Related Activities and Relevant Trade*, including participation of a range of national regulatory agencies in regional and international meetings and workshops aimed at combatting IUU fishing. A national interagency workshop and port inspection training course, facilitated through the programme outlined in 6. above, was convened from 26 September to 7 October 2022, specifically focusing on implementation of port State measures, including networking and data and information sharing at the national, regional and international levels;
8. a system of inspections of foreign fishing vessels at port is instituted as at October 2022 – with a target, based on existing resources, of three foreign-flagged vessel inspections per month;

9. the Fisheries Division received training on implementation of Catch Documentation Schemes from 12 to 16 September 2022 through the same programme outlined in 6. above, in preparation for development of a national traceability system and the requisite catch documentation scheme for key priority fisheries and species.

We hope that the above information, along with Trinidad and Tobago's Annual Report (2022) submitted to the Commission, adequately explain the current situation with respect to implementation of Rec 18-09 and can provide any further clarifications if required.

TTO wishes to reiterate its continued commitment towards conservation and management of tunas and tuna-like species in the Convention Area.

Your sincerely,


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

DIRECTOR OF FISHERIES