

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 **11 October 2024**. Replies received after the deadline will be presented as **Addendum** to **COC-309**.

Appendix 1: Contains *Responses from CPCs to Letters Sent in 2023 from the Chair of the Compliance Committee*.

Appendix 2: Contains *Action plans sent in 2024 at the request of the Chair of the Compliance Committee*.

Annex 1: Contains the *Letters on Issues of Compliance sent by the Chair of the Compliance Committee*.

Annex 2: Contains *Supporting Documents from CPCs to Letters from the Chair of the Compliance Committee*.

***Letter Type Key:**

RI= Reporting issues; II = Implementation issues; OH = Overharvest; ID = Identification; None = No letter sent

<i>CPC</i>	<i>Letter Type*</i>	<i>Reply Received</i>	<i>Template Completed</i>	<i>Missing Information Sent</i>	<i>Requested Action Plan Sent</i>
Albania	RI	7-Oct-2024	Yes	Yes	No. Elements of requested action plan are set forth in the Response Template.
Algeria	RI	11-Oct-2024	Yes	Yes	No. Elements of requested action plan are set forth in the Response Template.
Angola	RI/II/ID	10-Oct-2024	Yes	Yes	14-Oct-2024
Barbados	RI/II/OH	11-Oct-2024	Yes	Yes	No. Elements of requested action plan are set forth in the Response Template.
Belize	RI/II	NO REPLY			
Brazil	RI/OH	11-Oct-2024	Yes	Yes	Not Applicable
Cabo Verde	RI/II/ID	NO REPLY			
<i>Canada</i>	NONE	NOT APPLICABLE			
China PR	RI	10-Oct-2024	Yes	Yes	No. Elements of requested action plan are set forth in the Response Template.
Costa Rica	RI/II/OH	9-Oct-2024	Yes	Yes	No. Elements of requested action plan are set forth in the Response Template.
Côte d'Ivoire	RI/II	NO REPLY			
Curaçao	RI/II/OH	9-Oct-2024	Yes	Yes	Not Applicable
<i>Egypt</i>	NONE	NOT APPLICABLE			
<i>El Salvador</i>	NONE	NOT APPLICABLE			
Equatorial Guinea	RI/II	NO REPLY			
European Union	RI	11-Oct-2024	Yes	Yes	Not Applicable
<i>France SPM</i>	NONE	NOT APPLICABLE			
Gabon	RI	NO REPLY			
Gambia	RI/II	NO REPLY			
Ghana	RI/II	9-Oct-2024	Yes	Yes	Not Applicable
Grenada	RI/II/OH/ID	NO REPLY			

<i>CPC</i>	<i>Letter Type*</i>	<i>Reply Received</i>	<i>Template Completed</i>	<i>Missing Information Sent</i>	<i>Requested Action Plan Sent</i>
	Letter: Significant recurring reporting issues.				
Guatemala	RI/II	11-Oct-2024	Yes	Yes	Not Applicable
Guinea Bissau	RI/II/ID Letter: Significant recurring reporting issues.	NO REPLY			
Guinea Rep.	RI/II	11-Oct-2024	Yes	Yes	11-Oct-2024
Honduras	RI/II	NO REPLY			
Iceland	RI	13-Sept-2024	Yes	Yes	Not Applicable
Japan	OH	30-Oct-2024	Yes	Yes	Not Applicable
<i>Korea</i>	NONE	NOT APPLICABLE			
Liberia	RI/II/OH	23-Sept-2024	Yes	Yes	No. Elements of requested action plan are set forth in the Response Template.
Libya	RI/II	6-Oct-2024	Yes	Yes	Not Applicable
Mauritania	RI/II	NO REPLY			
<i>Mexico</i>	NONE	NOT APPLICABLE			
<i>Morocco</i>	NONE	NOT APPLICABLE			
Namibia	RI/OH/ID Letter: Recurrent significant reporting issues; recurring overharvest.	23-Sept-2024	Yes	Yes	Not Applicable
Nicaragua	RI	NO REPLY			
Nigeria	RI/II	NO REPLY			
<i>Norway</i>	NONE	NOT APPLICABLE			
Panama	RI	30-Sept-2024	Yes	Yes	Not Applicable
<i>Philippines</i>	NONE	NOT APPLICABLE			
<i>Russia</i>	NONE	NOT APPLICABLE			
São Tomé e Príncipe	RI/II/OH/ID Letter: Recurrent reporting issues.	NO REPLY			
Senegal	RI/II/OH/ID Letter: Recurrent significant reporting issues; recurring overharvest.	8-Oct-2024	Yes	Yes	18-April-2024
Sierra Leone	RI/II	NO REPLY			
South Africa	RI	9-Oct-2024	Yes	Yes	Not Applicable
St. Vincent & Grenadines	RI/II/OH/ID Letter: Recurrent reporting issues; recurring overharvest.	11-Oct-2024	Yes	Yes	Not Applicable
Syria	RI/II	10-Oct-2024	Yes	Yes	Not Applicable
Trinidad & Tobago	RI/II	11-Oct-2024	Yes	Yes	Not Applicable
Tunisia	RI	NO REPLY			
<i>Türkiye</i>	NONE	NOT APPLICABLE			
<i>Uruguay</i>	NONE	NOT APPLICABLE			
<i>UK</i>	NONE	NOT APPLICABLE			
<i>USA</i>	NONE	NOT APPLICABLE			

<i>CPC</i>	<i>Letter Type*</i>	<i>Reply Received</i>	<i>Template Completed</i>	<i>Missing Information Sent</i>	<i>Requested Action Plan Sent</i>
Venezuela	RI/II/OH	26-Sept-2024	Yes	Yes	No. Elements of requested action plan are set forth in the Response Template.
Bolivia	RI	18-Sept-2024	Yes	Yes	Not Applicable
<i>Chinese Taipei</i>	NONE	NOT APPLICABLE			
Guyana	RI	11-Oct-2024	Yes	Yes	Not Applicable
<i>Suriname</i>	NONE	NOT APPLICABLE			



REPUBLIKA E SHQIPËRIË

MINISTRY OF AGRICULTURE AND RURAL DEVELOPMENT

Tirana on 07/10/2024

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

SUBJECT: RESPONSE TO LETTER ON COMPLIANCE ISSUE (S24-09304, ICCAT-SALIDA 2024-09-13)

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 2023 and listed in your letter.

Please allow me to clarify the listed deficiencies:

- CPC Albania conducts its BFT activities with two purse seiner vessels and currently does not have a scientific observer program onboard. Conversely, since 2019, with support from GFCM, Albania has been implementing a by-catch monitoring program with observers on fishing vessels, including bottom and pelagic trawlers and purse seiners, in the Adriatic Sea. This initiative aims to gather comprehensive data on the discard portion of the total by-catch and information on the incidental capture of vulnerable species. CPC Albania has submitted the "Albania Final Report 2021-2022" to ICCAT. As soon as the "Final Report 2023-2024" is ready, CPC Albania will provide it to ICCAT.
- CPC Albania utilized its bluefin tuna quota by June 3rd, 2023, and notified the Secretariat. Consequently, we began the caging of BFT earlier than planned. As a result, we adjusted CP01-VessLst_ALB-OtherVess_2023, 15 days ahead of schedule, on 27/06/2023. The caging in June was unforeseen. We have informed the Secretariat about these changes.

I do apologize for the deficiencies 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

Roland Kristo
Roland
Kristo
Digitally signed by Roland Kristo
Date: 2024.10.07 14:03:38 +02'00'

Adresa: Bulevardi "Dëshmorët e Kombit", Nr. 2, Tiranë

Tel/Fax 3554 2232796

Compliance letter response template

2023 Commission Meeting			
CPC: ALBANIA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE	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 ST09 form.	CPC Albania conducts its BFT activities with two purse seiner vessels and currently does not have a scientific observer program onboard. Conversely, since 2019, with support from GFCM, Albania has been implementing a by-catch monitoring program with observers on fishing vessels, including bottom and pelagic trawlers and purse seiners, in the Adriatic Sea. This initiative aims to gather comprehensive data on the discard portion of the total by-catch and information on the incidental capture of vulnerable species. CPC Albania has submitted the "Albania Final Report 2021-2022" to ICCAT. As soon as the "Final Report 2023-2024" is ready, CPC Albania will provide it to ICCAT.	15/09/2023
<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>	<p>Rec. 21-08 (para. 52-53): Retroactive submission of BFT-E other vessel (vessel was submitted 15 days in advance but original authorization date, but date was subsequently revised resulting in submission having been made less than 15 days in advance) 2) Late authorization of one other BFT-E other vessel.</p>	<p>CPC Albania utilized its bluefin tuna quota by 3 June 2023 and notified the Secretariat. Consequently, we began the caging of BFT earlier than planned. As a result, we adjusted CP01-VessLst_ALB-OtherVEss_2023, 15 days ahead of schedule, on 27/06/2023. The caging in June was unforeseen. We have informed the Secretariat about these changes.</p>	
OTHER	<i>Date sent:</i>	<i>Template completed?</i>	<i>Explanation received?</i>
Response to COC Chair letter from previous year?			
MITIGATING CIRCUMSTANCES	<i>Request made to:</i>	<i>Date request sent:</i>	<i>Request approved/rejected</i>
Request for Capacity Building (indicate fund/type)			

Compliance letter response template

2023 Commission Meeting			
CPC: ALGERIA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE	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>	<p>No Task 2 data.</p> <p>Rec. 16-14. No ST-09 form.</p>	<p>The Annual Report, which was submitted on time, contained relevant information on scientific observation data for the fleet targeting the following (ICCAT) species:</p> <ul style="list-style-type: none"> – As regards longliners operating in jurisdictional waters, given the small size of these vessels (small-scale fishing vessels less than 15 metres in length, most of which have no deck or bridge and carry out short trips), information is gathered at the ports of landing by inspectors and collectors from the national fisheries administration. – For purse seiners targeting bluefin tuna, the national regulations require an observer to be embarked on each purse seiner. There is therefore 100% coverage. This coverage is provided by the national controllers/observers of the fisheries administration, who collect the data. – All this information has always been included in the Annual Reports submitted to the ICCAT Secretariat. 	<p>These alternative measures have been communicated each year to the ICCAT Secretariat through the Annual Reports. They were even discussed at the 2023 Annual Meeting.</p>

<i>Other reports – Shark and Billfish Check Sheets</i>	Rec. 16-05 . SWO-MD fishing plan received slightly late.	A new team arrived in 2022 which required time to make the transition and understand the reporting requirements and deadlines. Moreover, measures have been taken to ensure that data are transmitted within the established deadlines.	The fishing plan was submitted on 17 March 2023, with the related explanations.
	Rec. 18-06 . Shark Check Sheet received late.	A new team arrived in 2022 which required time to make the transition and understand the reporting requirements and deadlines. Moreover, measures have been taken to ensure that data are transmitted within the established deadlines.	The Shark Check Sheet was submitted on 26 September 2022.
CATEGORY C			
<i>MCS-species related</i>			
<i>MCS-general: Port Controls</i>			
<i>Vessel Controls</i>			
OTHER	<i>Date sent:</i>	<i>Template completed?</i>	<i>Explanation received?</i>
Response to COC Chair letter from previous year?			
MITIGATING CIRCUMSTANCES	<i>Request made to:</i>	<i>Date request sent:</i>	<i>Request approved/rejected</i>
Request for Capacity Building (indicate fund/type)			

Compliance letter response template

2023 Commission Meeting			
CPC: ANGOLA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
CATEGORY A			
<i>Compliance Tables</i>	Rec. 18-07: Compliance tables received late in 2023 with no size sheet; no Compliance tables received in 2022.	Following the prohibition of retention, Angola took action by requesting technical assistance from the ICCAT Statistical Department. As a result, previous years Task 1 on nominal catch data and fleet were submitted and validated. That resulted in release from the suspension. Compliance tables submitted in 2024.	February 2023
	Difference between Compliance tables and Task 1 (S. ALB).	Angola got clarification on the difference between Compliance tables and Task 1 table early this year (2024), as result the two tables have been submitted differently. However, we are looking forward to improving where necessary.	9 July 2024
	Unreported billfish catches remain unresolved.	After a few working sessions on billfish check sheet with the ICCAT Secretariat and NOAA fisheries experts who usually participate in ICCAT sessions, in June/July 2024, sharks and billfish check sheets were submitted to the Secretariat with minor corrections. We are busy filling up previous years gaps by looking at historical data available.	24 January 2024: meeting with NOAA, a few issues concerning billfish recommendation were addressed. Additional information was obtained from ICCAT Circular # 03024 / 2024, of 8 April 2024.
<i>Capacity, size, gear, time, area restrictions</i>			

CATEGORY B			
<i>Annual Report</i>	Some responses in IOMS incomplete/incorrect (please contact Secretariat for more detail).	We will contact the Secretariat and proceed accordingly. Considering the importance of Integrated Online Management System.	
<i>Statistical Data</i>	Rec. 11-15 : Fishing activity took place while under prohibition on retention of ICCAT species.	The issue of fishing while under prohibition of retention was clarified during the meeting between Angola and ICCAT Secretariat in October last year in Madrid. The explanation was that: following prohibition of retention notification in February 2023, Angola submitted Task 1 data (nominal catch and vessel characteristics) and two weeks later the suspension was lifted. After this step we assured fishing could take place. However, the Secretariat informed that there was a need to request the Secretariat to reactivate the vessel registry. The situation was further clarified and sorted during last year's (2023) Annual Meeting in Cairo.	16-17 October 2024 The issue was solved during the 2023 ICCAT Annual Meeting in Cairo, November 2023.
	No Task 2 data submitted.	Task 2 data submitted in June 2024, later through ST03-T2CE, including small tunas bycatch from other fisheries ex. Mid water trawling. The Secretariat acknowledged receipt with minor correction and resubmitted a few days later.	Statistics forms submitted and acknowledged by ICCAT Secretariat on 4 June 2024. Registration number E24-06455.

	No ST09 form submitted (observer data).	We will take this issue up with the National Inspectorate Office and outline actions to be taken in the Action Plan to be submitted soon. It is important to highlight that the vessel has been operating with a fisheries observer on board.	
<i>Other reports – Shark and Billfish Check Sheets</i>	Rec. 18-05 and Rec. 18-06 : No check sheets received (also deficiency in 2022).	After holding a few working sessions with the ICCAT Secretariat and NOAA Fisheries experts on billfish check sheet in 2023/2024, in June/July 2024, sharks and billfish check sheets were submitted to the Secretariat. The Secretariat acknowledged receipt and sent a few comments /corrections on the feedback and resubmitted later.	Shark Check Sheet: submitted and acknowledged by the Technical Officer on 01 August 2024. Registration number E24-08983. Billfish Check Sheet: submitted and acknowledged by the Compliance Assistant from ICCAT Secretariat on 29 July 2024. Registration number E24-088460078.
CATEGORY C			
<i>MCS-species related</i>	Rec. 21-01 : Task 1 for tropical species in 2022 but no corresponding periodical reports submitted.	Angola will look into the issue of periodical reporting of tropical species and outline further steps (actions to be taken) in the Action Plan, as requested.	
	Rec. 22-12 : No information on implementation of turtle measure.	The National Fisheries Directorate will look into the turtle implementation measures with national relevant institutions (fisheries and environmental research institutions) and outline details and further steps in the Action Plan, as requested.	

<i>MCS-general: Port Controls</i>	Rec. 18-09: No information on in-port transshipment.	In general, there is no in-port transshipment of tuna or tuna-like species. However, we will provide details in the Action Plan on how Angola will deal with such issues in terms of MCS and reporting.	
<i>Vessel Controls</i>			
<i>Observer Programmes</i>	Rec. 16-14: No information on scientific observer programme.	At the moment, the Scientific Observer Program is conducted at the landing sites by the National Institute of Fisheries Research of Angola, in line with the National Sampling Program. However there is a fisheries observer onboard the only vessel targeting tuna and tuna-like species, under the National Observer Program implemented by the Fisheries Inspectorate Office.	
OTHER	<i>Date sent:</i>	<i>Template completed?</i>	<i>Explanation received?</i>
Response to COC Chair letter from previous year?	No reply to COC Chair letter following 2022 meeting.	Upon imposition of the prohibition, Angola took actions, including an in-person meeting with ICCAT Secretariat in Madrid, including the COC representative. Following the meeting in Madrid, an official email /response was sent by the Angolan Fisheries Authority.	July 2024 16-17 October 2024
	Prohibition of retention of ICCAT species pursuant to Rec. 11-15 lifted on 14 August 2023 as T1 received.		
MITIGATING CIRCUMSTANCES	<i>Request made to:</i>	<i>Date request sent:</i>	<i>Request approved/rejected</i>
Request for Capacity Building (indicate fund/type)	ICCAT Secretariat NOAA Fisheries	3rd term of 2023 1st term of 2024 3rd term of 2024	With ICCAT we benefited from the training in Morocco and a few online; Waiting for NOAA feedback.



9 October 2024

Chair
Conservation and Management Measures Compliance Committee
International Commission for the Conservation of Atlantic Tunas
Corazón de María, 8. 28002
Madrid, SPAIN

Dear Dr. Campbell:

Re: Barbados' Responses to Compliance Issues

Greetings from the Fisheries Division. I hope this communication finds you well and in good health.

We are writing to formally respond to the three compliance issues included in the attached table created with the template supplied. However, through this letter we would like to more fully respond specifically to the request for additional information on actions being implemented and submission of an action plan for the payback of the reported overharvesting of Blue and White marlins.

On 1st July 2024, the intense storm surge generated by the passage of category 4 Hurricane Beryl to the South of Barbados destroyed the breakwater which protected the Bridgetown Fishing Harbour and housed the majority of the island's pelagic fishing vessels including the entire longline fleet. This resulted in significant damage to 176 vessels of all types and completely destroying 64. Of this number, 37 longliners were damaged and 1 completely lost. As a result, all fishing activity, including that of the longliner fleet has been significantly decreased for at least for the rest of the year. This in turn has redounded to a substantial reduction in catches of all fish species including marlins. As such the projected landings of white and blue marlins for 2024 should be significantly less than for any past year and below the respective 10 t quota/limit set for these species.

It must be noted that even though Barbados has restrained catches of blue and white marlin to below the respective allocated 10t catch limit/quota, in 2022 and 2023, because of the 25%

Transformative >> Inclusive << Sustainable

Address: Princess Alice Highway, Bridgetown, St. Michael, Barbados

Email: Fisheries.Division@barbados.gov.bb | Tel: (246) 535-5800 | Website: <https://fisheries.gov.bb>



-2-

penalty, in the case of blue marlins for example, the island at present has been burdened with an additional 11 t of a phantom catch accrued overage, which represents fish that were never taken from the stock and thus in no way contributed to the status of the stock. In this context, even despite the recent catastrophic impact of Hurricane on the fishing fleet and the anticipated significant reductions in landings, Barbados will still remain mired in significant catch overages for the marlin species and for which there is no apparent workable means of “payback” within a short timeframe.

In this regard it must be noted that the majority of marlin catches are taken incidentally by the local longline fleet, which primarily targets yellowfin and bigeye tunas in fishing areas also abundantly inhabited by marlins. For this reason, the likelihood of incidentally catching marlins is high and it is only an overall reduction in fishing effort that could perceivably significantly reduce marlin catches. This is obviously untenable as it would result in making the fishery economically unviable, resulting in significant losses in employment and the island’s food supply. Furthermore, it should be reiterated that marlins are only sold and consumed locally and as such intrinsically contribute to the island’s food security and the livelihoods of fisherfolk, especially now so against the backdrop of the significant diminution in catches of Barbados’ keystone flyingfish and dolphinfish fisheries as a result of the annual incidences of sargassum inundations of the island’s fishing areas. In this context, it should be noted that a significant portion of the vessels that target those species are included among the aforementioned vessels damaged or destroyed due to the passage of Hurricane Beryl and portends to a further significant reduction in fish catches and thus the contribution to the island’s food supplies.

Given the above facts, Barbados is in no position at the moment to present a cogent short-term payback plan for the existing overages of marlin catches. Further in this context noting the inherent uncertainties in the degree and rate of recovery of its fishing fleet and the overarching food security imperatives. However, ICCAT is urged to note the commitment by Barbados to continuing efforts to reduce marlin catches to the extent reasonably possible inter alia through pending legislation that will mandate (a) that longlines are not to be deployed, set or used with specialized fishing tackle; specific bait; or fishing technology, to target billfish (b) that only circle hooks of a size greater than 16/0, and not offset; or 18/0, with an offset no greater than 10 degrees are to be used on longlines (c) that any billfish incidentally taken on longlines that are alive at haulback are to promptly released in a manner that maximizes their survival accordance or if already dead, a percentage of the fish as specified by the Chief Fisheries Officer may be retained and disposed of in accordance with such conditions as she specifies.



-3-

In this context it should be noted that circle hooks are already being used by some longliners and that a study will be conducted in 2025 to test the relative efficacy of these hooks in reducing unwanted bycatch, and it is hoped that another study testing the impact of water depth on catch composition will follow to advise on the possible introduction of legislation to regulate fishing depth ranges to reduce incidental by-catch catch rates of a number of species including marlins.

We hope that the narrative above sufficiently conveys our concerns and commitment to promoting sustainable fisheries for all Barbadians.

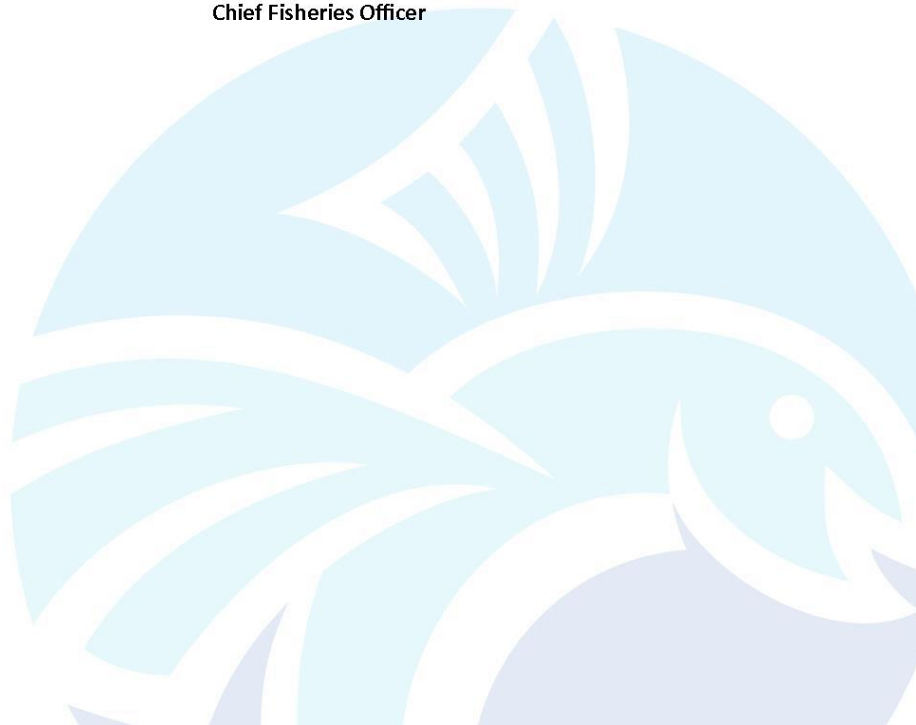
For more information, please contact yours truly at Shelly-Ann.Cox@barbados.gov.bb or (246) 535-5803/ 249-6227.

Please accept assurances of my highest consideration.

Yours in sustainable fisheries,

A handwritten signature in black ink that reads "SALCO".

.....
Dr. Shelly-Ann Cox
Chief Fisheries Officer



Compliance letter response template

2023 Commission Meeting			
CPC: BARBADOS			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
CATEGORY A			
<i>Compliance Tables</i>	Difference between Task 1 and Compliance table BSH.		2024-08-15 in Compliance table.
<i>Catch, capacity, size, gear, time, area restrictions</i>	Rec. 19-05 : Overharvest of BUM and WHM.		<p>The forthcoming Sustainable Fisheries Management and Development Act and Fisheries Management Regulations discussed in the National Report mandate (a) that longlines are not to be deployed, set or used with specialized fishing tackle; specific bait; or fishing technology, to target billfish (b) that only circle hooks of a size greater than 16/0, and not offset; or 18/0, with an offset no greater than 10 degrees are to be used on longlines (c) that any billfish incidentally taken on longlines that are alive at haulback are to promptly released in a manner that maximizes their survival accordance or if already dead, a percentage of the fish as specified by the Chief Fisheries Officer may be retained and disposed of in accordance with such conditions as he specifies.</p> <p>While these methods are aimed at curbing catches of billfish including marlins in an effort to comply with the current set quotas, the Commission is reminded that billfish are eaten in Barbados and contribute to the island's food security in addition to being an important component of the catches of the island's longline fleet and thus the economic viability of that fishery and the livelihoods of fisherfolk. It should also be noted that longliners are targeting yellowfin and bigeye tunas in fishing areas abundantly inhabited by marlins. For this reason, marlins</p>

			<p>are caught incidentally, but are consumed and contribute to food security.</p> <p>It should also be noted that on July 1st the intense storm surge generated by the passage of category 4 Hurricane Beryl destroyed the breakwater that protected the Bridgetown Fishing Harbour and housed the majority of pelagic fishing vessels including the entire Longliner fleet. This resulted in significant damage to 176 vessels of all types and completely destroying 64. Of this number 37 longliners were damaged and 1 completely lost. As a result, fishing activity including that of the longliner fleet has been significantly decreased for at least for the rest of the year, which in turn has redounded to a great reduction in fish catches including marlins.</p>
CATEGORY B			
<i>Annual Report</i>			
<i>Statistical Data</i>	<p>Rec. 16-14: No ST09 received.</p>		<p>The forthcoming Sustainable Fisheries Management and Development Act and Fisheries Management Regulations discussed in the National Report include a very detailed regulation mandating that all catches, including incidental, of all species, fishing effort and other fishing trip information should be recorded and reported for both commercial and recreational vessels. The legislation does not use the term “logbook” as the use of other formats for recording this information such as electronic reporting formats are contemplated. In this context, as reported in the National report, VMS has already been installed on a number of longliners and it is expected that the whole fleet will be fitted with these systems by year end. In addition, the digitization of a catch and effort data form using the KoboToolbox platform was implemented in November of 2023.</p>

			A regulation also mandates participation by both commercial and recreational vessels in approved observer programmes including electronic monitoring as required. The use of electronic monitoring systems for longline vessels with Shellcatch is currently first being explored as part of the regional REBYC-III CLME+ project aimed at managing bycatch and reducing discards. However, the EMS will also be applied to report on fishing activity in the contexts of collecting accurate trip information as well as fulfilling observer requirements.
<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	<i>Date sent:</i>	<i>Template completed?</i>	<i>Explanation received?</i>
Response to COC Chair letter from previous year?			
MITIGATING CIRCUMSTANCES	<i>Request made to:</i>	<i>Date request sent:</i>	<i>Request approved/rejected</i>
Request for Capacity Building (indicate fund/type)			



MINISTRY OF FISHERIES AND AQUACULTURE
NATIONAL SECRETARIAT FOR REGISTRATION, MONITORING AND RESEARCH OF FISHERIES AND AQUACULTURE

OFÍCIO - MPA Nº 925/2024/SERMOP - MPA/MPA

Brasília/DF, October 11, 2024.

To ICCAT's Compliance Committee
Mr. Derek Campbell
Compliance Committee Chair
ICCAT Secretariat Calle Corazón de María, 8-6º 28002 Madrid Spain
E-mail: info@iccat.int

Subject: Explanation letter to ICCAT # S24-09307

Mr. Derek Campbell,

1. Brazil acknowledges the receipt of your letter on compliance issues addressed, dated September 13th, 2024. We are grateful to you for drawing our attention to the concerns raised and for the opportunity to provide the necessary clarifications. Therefore, we present below a list of actions Brazil took to address the problem for due consideration by the Compliance Committee.
2. Under the ICCAT conservation and management program for tropical tunas adopted by the Commission (Rec 21-01; Rec 22-01; Rec 23-01), Brazil recognizes that, in the recent period, it has been exceeding its BET catch limits.
3. The recent growth of the Brazilian BET fishery has posed significant challenges in effectively implementing control mechanisms as required by its obligations under this RFMO. This is particularly the case of our small-scale handline fishery ("Cardume Associado"), which lands its catches over a significant number of points spread along more than 8 thousand kilometres of coastline. This reality has hampered the country's ability to monitor this fishery.
4. Brazil has been making an enormous effort over the years to solve these issues, improving the regulatory framework and getting stakeholders to take practical actions to improve its compliance. Brazil has consolidated its systems to monitor and control tuna and tuna-like fishing by ordinances more robust in 2023 – the Interministerial Ordinance MPA/MMA Nº 02/2023, which established the catch limit of tropical tunas for 2023 and the Interministerial Ordinance MPA/MMA Nº 05/2023, that established a catch limit controlling system for BET for 2023, also prohibiting the BET catch by handline fishery from September of 2023 to December, 31. Moreover, the Ordinance MPA Nº 170/2023 closed all BET fisheries on December 15, 2023, when the trigger of 95% of the catch limit was detected. However, despite these severe control measures, Brazil has overharvested the 2023 annual quota by 922 tons.
5. Hence, considering that Brazil has overharvested in the last years, initiatives and measures have been implemented since 2021 and reinforced in 2023 and 2024 to refine the tuna fisheries control and monitoring of the national catch limits to avoid future overharvesting, as follows:
 - 5.1. The Ordinance SAP/MAPA Nº 643, 24 March 2022, prohibits new fishing vessel authorizations to catch bigeye tuna.

5.2. The Ordinance MPA Nº 135, 27 September 2023, obligates all tuna and tuna alike vessels to report on board logbooks in a digital system from 1st January 2024.

5.3. At the National Collaborative Network for Sustainable Management of Fishing Resources - Federal Decree nº 10.736, 29 June 2021, three meetings were conducted by the Standing Committee for Tuna Management, encompassing the productive sector, researchers and government agencies. At those meetings, improvements were developed to enhance the Brazilian capacity to monitor and control the BET catch limit.

5.4. Within the National Collaborative Network for Sustainable Management of Fishing Resources - Federal Decree Nº 10.736, 29 June 2021, conducted by the Standing Committee for Tuna Management Brazil has incremented the national regulatory framework in 2024 to overcome the “Continued overharvest of BET” as follows (see attached COMPLIANCE LETTER RESPONSE TEMPLATE):

a) Interministerial Ordinance MPA/MMA Nº 10, 26 March 2024, establishes, for the year 2024, the catch-limit of the species Albacore (*Thunnus alalunga*, 3.040 t), bigeye tuna (*Thunnus obesus*, 5.639 t), Swordfish-North (*Xiphias gladius*, 45 t), Swordfish-South (*Xiphias gladius*, 2.839 t), and Blue Shark (*Prionace glauca*, 3481 t) in the Territorial Sea and Exclusive Economic Zone (EEZ) for the Brazilian fishing vessels.

b) Interministerial Ordinance MPA/MMA Nº 12, 2 August 2024, establishes, for 2024, the monitoring, control and inspection measures for the catch limit of BET for the Brazilian fishing vessels operating in the Territorial Sea, the Exclusive Economic Zone and international waters. In this matter, we highlight the improvements for the current year:

The established limit to be allocated to fishing fleets totalized 5.381 t. Therefore, a buffer of 4,6% was included to avoid overharvest.

The catch limit control system is based on digital logbooks with a reduced report period for longline and handline fisheries (15 days to 7 days). This measure enhances the ability to compile catch data in a short period and, therefore, efficiently close fisheries when the established trigger is observed.

Bigeye landing prohibition by longline fishery when reaching 95% of its limit and handline fishery when reaching the 80% trigger that is 10% harder than the trigger established in 2023.

Bigeye landing prohibition by any other tuna and tuna-like fishery when reaching its limit.

Total closure of bigeye tuna fisheries when 95% of Brazilian total catch limit (5.639 t) was detected.

c) Interministerial Ordinance MPA/MMA Nº 358, 10 October 2024, closes the Bigeye tuna fishing to Longline: surface (LL-surf).

Bigeye landing prohibition for the first fleets of tuna and tuna-like fishery due to reaching its catch limit.

6. In addition, Brazil would like to highlight that it has increased its efforts to monitor port landings for tuna fisheries in some areas at the end of 2023.

7. Finally, on January 1, 2024, Brazil implemented the national long-term research and data collection program (PMPA - Tuna and tuna-like fish monitoring program in Brazil) funded by the Brazilian government (Ministry of Fisheries and Aquaculture) in partnership with a research institution (Federal Rural University of Pernambuco) under number [TED Nº 14/2023 - MPA/UFRPE](#) which has a total budget of 2 million euros to surveil by onboard observers and port monitoring all tuna and tuna-like fishing over the country's coastline during the next four-year.

Annexe – COMPLIANCE LETTER RESPONSE TEMPLATE

Respectfully,

(Electronically signed)

LUIS GUSTAVO CARDOSO

Brazil's Head delegate

National Secretariat of Registration, Monitoring and Research

Ministry of Fisheries and Aquaculture



Documento assinado eletronicamente por **LUIS GUSTAVO CARDOSO**, **Secretario(a) Nacional de Registro, Monitoramento e Pesquisa Ministério da Pesca e Aquicultura**, em 11/10/2024, às 15:44, conforme horário oficial de Brasília, com fundamento no art. 4º, § 3º, do [Decreto nº 10.543, de 13 de novembro de 2020](#).



A autenticidade deste documento pode ser conferida no site:

https://sei.agro.gov.br/sei/controlador_externo.php?acao=documento_conferir&id_orgao_acesso_externo=0, informando o código verificador **38356612** e o código CRC **9CA1207B**.

Setor de Indústrias Gráficas (SIG), Quadra 02, Ed. Soheste, Lotes 530 a 560, Bairro: SIG

CEP 70610-420 - Brasília/DF

Telefone: (61)3276-4439 E-mail: sermop@mpa.gov.br

Referência: Processo nº 00350.090166/2024-15

SEI nº 38356612

Compliance letter response template

2023 Commission Meeting			
CPC: BRAZIL			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
CATEGORY A			
<i>Compliance Tables</i>	Rec. 18-07: Compliance tables received late.	<p>Brazil recognizes the late sending on September 16, 2024, of the COC Reporting Tables. This occurred due to a delay in the process of organizing and validating statistical data.</p> <p>Brazil implemented the digital onboard logbook on January 1, 2024, compulsory for the entire fleet to increase the speed and agility in the flow and analysis of catch data. However, the new digital system presented some issues that have delayed our capacity to analyze all the data to deliver the information on time.</p> <p>The Ordinance MPA nº 135, 27 September 2023, obligates all tuna and tuna alike vessels to report on board logbooks in a digital system from 1st January 2024.</p>	
<i>Catch, capacity, size, gear, time, area restrictions</i>	Rec. 21-01: Continued BET overharvest.	<p>In September 2023, Brazil forbid the BET landings for its hand-line fisheries and on December 15 all the fisheries interacting with BET were closed. Please, see the related Ordinances below:</p> <p>Interministerial Ordinance MPA/MMA Nº 02, 28 of March of T2023</p> <p>Interministerial Ordinance MPA/MMA Nº 05, 22 of September of 2023</p> <p>Interministerial Ordinance MPA/MMA Nº 170, 14 of December of 2023</p> <p>** (for details, see the explanation letter)</p>	
CATEGORY B			
<i>Annual Report</i>			
<i>Statistical Data</i>			

<i>Other reports</i>			
CATEGORY C			
<i>MCS-species related</i>			
<i>MCS-general: Port Controls</i>	Request additional information on efforts related to improved port monitoring and observer coverage as requested in the letter from the ICCAT COC Chair in its letter following the 2022 Annual Meeting.	<p>Brazil increased its efforts to monitor port landings for tuna fisheries in some areas at end of the 2023.</p> <p>On January 1, 2024, Brazil implemented the national long-term research and data collection program (PMPA - Tuna and tuna-like fish monitoring program in Brazil), which will surveil onboard observers and port monitoring all tuna and tuna-like fishing fleets across the country's coastline.</p> <p>This program under number TED n° 14/2023 - MPA/UFRPE has a total budget of 2 million euros over its four-year duration.</p>	
<i>Vessel Controls</i>			
OTHER	<i>Date sent:</i>	<i>Template completed?</i>	<i>Explanation received?</i>
Response to COC Chair letter from previous year?	29 September 2023	Yes	Yes
MITIGATING CIRCUMSTANCES	<i>Request made to:</i>	<i>Date request sent:</i>	<i>Request approved/rejected*</i>
Request for Capacity Building (indicate fund/type)			

Re: SUBJECT: LETTER ON COMPLIANCE ISSUES - CHINA

Dear Mr. Derek Campbell,

Thank you for your letter (S24-09308) on compliance issues dated on September 13, 2024.

First of all, I would like to take this opportunity to express our sincere thanks for your efforts and hard works on promoting compliance issues within ICCAT.

We paid high attention to your letter and have carefully reviewed the deficiency as mentioned in the letter. Regarding the deficiency, we have already made relative improvements to avoid late submission of BFT fishing vessel and other data happen again. We would like to submit the action taken in the attachment for reference.

We also 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 in the ICCAT Convention area.

Best regards,

SUN Haiwen
Deputy Director General
Bureau of Fisheries, Ministry of Agriculture and Rural Affairs
People's Republic of China

Appendix 1

Compliance letter response template

2023 Commission Meeting			
CPC: CHINA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	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 – Shark and Billfish Check Sheets</i>			
CATEGORY C			
<i>MCS-species related</i>	Rec. 22-08: Late submission of BFT fishing vessel (i.e. not 15 days in advance).	1. Establish checklist for bluefin tuna fishing, which lists all the responsibilities and deadlines as required by Rec 22-08. 2. Improve domestic reporting process so as to accelerate all the reporting forms transferring from the different agencies. 3. Increase working staff at essential position in order to crosscheck reporting.	2024 October 9
<i>MCS-general: Port Controls</i>			
<i>Vessel Controls</i>			
OTHER	<i>Date sent:</i>	<i>Template completed?</i>	<i>Explanation received?</i>
Response to COC Chair letter from previous year?			
MITIGATING CIRCUMSTANCES	<i>Request made to:</i>	<i>Date request sent:</i>	<i>Request approved/rejected</i>
Request for Capacity Building (indicate fund/type)			

COSTA RICA INSTITUTE
FISHERIES AND AQUACULTURE

GOVERNMENT
OF COSTA RICA

Executive Chairship

7 October 2024
INCOPECA-PE-1169-2024

Mr Derek Campbell
Compliance Committee Chair
International Commission for the Conservation of Atlantic Tuna
info@iccat.int

Dear Sir:

I have the honour to address you in order to submit herewith the response template to the Compliance Committee letter, as requested through ICCAT salida No. S24-09329 of 13 September 2024.

As regards the other matters referred to in your letter, which were not included in the response template to the compliance letter, but were included in document COC_308_APP_2A_SPA_REV, the following clarification is provided:

An action plan will be requested to address these issues.

The points on Recs. 21-02, 19-05, 21-09 and 16-14 have been addressed in the response template and it is envisaged to continue with these actions. Below are the responses to the other issues raised in document COC_308_APP_2A_SPA_REV.

Letter also requesting specific regulatory information on how Costa Rica implements the requirement to prohibit silky sharks from entering international trade as a condition for exercising the exemption for developing State provided for in paragraph 4 of Rec. 11-08.

Currently, Costa Rica, through the Costa Rica Institute of Fisheries and Aquaculture (INCOPECA), which is the administrative authority for species of fisheries and aquaculture interest (including the species *Carcharhinus falciformis*) within the framework of CITES, issues certificates for the export of species for which a certificate is required, which is the case of the species. In order to issue this certificate, the administrative authority reviews extensively compliance with requirements and checks the documentation provided by the exporter. Among these documents, the inspection and landing forms (FID) of the product to be exported are requested. In this context, the administrative authority does not approve any exports corresponding to FIDs for catches taken in the Atlantic Ocean.

This is to ensure compliance with the exemption for developing States provided for in paragraph 4 of Rec. 11-08.

The 125% payback rules for BUM for overharvest during two consecutive years will be indicated.

For 2023 BUM landings were below 10 t, so it would be expected that the 125% payback would not apply for the next few years. Costa Rica has provided fishery statistics data that have been used for the 2024 blue marlin stock assessment.

The response template was not used to respond to the COC Chair letter from the previous year.

In 2022, the response template in Word format was used, which was submitted as an attachment to Official Communication N2. INCOPESCA-PE-1006-2022, on 30 September 2022. In 2023 the template was also used, which was submitted on 29 September 2023 as an attachment to Official Communication No. INCOPESCA-PE-0867-2023. Both Official Communications were sent to the email info@iccat.int.

Follow-up on outstanding deficiencies addressed in the COC Chair letter from the previous year.

Deficiencies from the previous year:

- Recs. 19-05 and 17-02:

*Continued overharvest of northern swordfish: no quota, 2021 balance = - 246.64 t. Negative balance of increasing northern swordfish: 2018 balance = -149.34, 2019 balance = -172.85, 2020 balance = -196.03.

*Continued overharvest of blue marlin: 2021 quota = 10, 2021 balance = -181.18 t. 181,18 t. Negative balance of increasing blue marlin: 2018 balance = -141.83, 2019 balance = -159.28, 2020 balance = -167,49

Response: These issues were addressed in the response template attached to the compliance letter.

- Rec. 19-02: Some tropical tunas Task 1 data reported for 2021, but without corresponding quarterly reports.

Response: In 2023 fishery statistics information was not available on a quarterly basis. However, starting in 2024, quarterly reports were submitted for tropical tunas, using information collected through the landing inspection forms. These are implemented on 100% of landings of the medium-scale (up to 40 nm range) and greater (beyond 40 nm range) commercial fleets.

Data from small-scale landings (up to 3 nm range) are collected through collection point invoices. These data still need to be computer input and are therefore not available on a quarterly basis, but as soon as they are processed they will be incorporated into the quarterly reports.

I take this opportunity to reiterate Costa Rica's commitment to improve its fisheries management on a daily basis, to comply with the ICCAT Recommendations and to collaborate in all that is within our reach. Costa Rica is fully prepared to provide any additional clarification that may be required.

Yours sincerely,

(signed and sealed)

Engineer Nelson Peña Navarro, MSc
Executive Chair
INCOPESCA

CC: incopescaICCAT@incopesca.go.cr
Archive MLA***

Compliance letter response template

2023 Commission Meeting			
CPC: COSTA RICA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
CATEGORY A			
<i>Compliance Tables</i>			
<i>Capacity, size, gear, time, area restrictions</i>	<p>Rec. 21-02: Continued overharvest of SWO-N.</p> <p>Rec. 19-05: Continued overharvest of blue marlin.</p>	<p>Costa Rica submitted fisheries data that have been used for the SWO-N and blue marlin stock assessments. In 2023 landings of blue marlin were reduced below the allocated landing limit of 10 t. In recent years the number of medium-scale longline vessels (up to 40 nm range) and greater (beyond 40 nm) has been reduced, which operate in the Costa Rica Exclusive Economic Zone in the Atlantic. Management measures have been implemented such as: closure of licenses register (no new licenses are issued), mandatory satellite monitoring with VMS, 100% inspections of landings of both fleets, implementation of fishing logbooks completed by captains. Moreover, Costa Rica has expressed its interest to the SCRS in participating in the northern swordfish biology programme.</p>	<p>12 July 2024 28 July 2023 29 July 2022</p>

CATEGORY B			
<i>Annual Report</i>			
<i>Statistical Data</i>			
<i>Other reports -</i>	Rec. 21-09 : Information on northern shortfin mako measures received late.	A working group has been established to monitor compliance with ICCAT requirements within the deadlines	
CATEGORY C			
<i>MCS-species related</i>			
<i>MCS-general: Port Controls</i>	Rec. 16-14 : Additional information required on progress in implementation of scientific observers programme.	Since 2023 a pilot onboard (human and electronic) observers plan has been implemented, which will be basis for the design of the national onboard observers programme. With the assistance of the Costa Rica Ministry of Agriculture and Livestock and the FAO, terms of reference for the design of the national onboard observers programme have been developed, and steps are being taken for its implementation.	
<i>Vessel Controls</i>			
OTHERS	<i>Data sent:</i>	<i>Template completed?</i>	<i>Explanation received?</i>
<i>Response to COC Chair letter from previous year?</i>			
MITIGATING CIRCUMSTANCES	<i>Request made to:</i>	<i>Date request sent:</i>	<i>Request approved/rejected</i>
Request for Capacity Building (indicate fund/type)			

Compliance letter response template

2023 Commission Meeting			
CPC: CURACAO			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
CATEGORY A			
<i>Compliance Tables</i>	Rec. 18-05 : Overharvest of BUM. 125% penalty has not been applied to overharvest.	Curacao commits to keeping its BUM catches below the adjusted landing limit as defined in Rec. 23-09 until the total negative balance from 2021 is fully paid back.	
<i>Catch, capacity, size, gear, time, area restrictions</i>	Rec. 19-05 : BUM overharvest.		
CATEGORY B			
<i>Annual Report</i>	Some responses in IOMS incomplete/incorrect.	Revised version received.	
<i>Statistical Data</i>	ST01 (fleet characteristics) received late.	Correct, last version was sent on 2024/8/1	
<i>Other reports – Shark and Billfish Check Sheets</i>			The Shark Check Sheet and the Billfish Check Sheet were both submitted on 18 September 2024. ICCAT registration number E24-11049.
CATEGORY C			
<i>MCS-species related</i>			
<i>MCS-general: Port Controls</i>	Rec. 16-14 : Additional information needed on implementation of Rec. 16-14 .		No observer program was organized by Curacao. Observers operating on Curacao vessels are from certified company Sea-Eye.
<i>Vessel Controls</i>			
OTHER			
	Date sent:	Template completed?	Explanation received?
Response to COC Chair letter from previous year?			After a IUU background check with the previous flag and the Spanish Authority, no IUU activities was detected. And previous activities were under Panamanian flag.
MITIGATING CIRCUMSTANCES			
	Request made to:	Date request sent:	Request approved/rejected
Request for Capacity Building (indicate fund/type)			Rejected.



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

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

Brussels,
MARE.B.2/CR (2024)

Dr. Derek Campbell,
Compliance Committee Chairman
ICCAT
Corazón de María, 8-6º/7
28002 Madrid
SPAIN

Subject: European Union reply to the letter on compliance issues (S24-09310)

Dear Dr. Campbell,

Thank you for your letter of 13 September 2024. The European Union has carefully considered the issues raised during the 2023 decision making process regarding its performance. Please find attached our response to the letter of compliance issues (S24-09310) informing on the specific remedial actions taken.

I trust that our reply provides a satisfactory response to all the points raised in your letter and I wish to reaffirm the strong commitment of the European Union to ensure full compliance with the ICCAT measures.

Yours faithfully,

Stijn BILLIET
Head of Delegation

Annex: Response to the letter of compliance issues

Cc.: Camille Jean-Pierre MANEL, Cristina CASTRO RIBEIRO, Fernando MIRANDA, Seamus HOWARD, Fabio GALLETI, Benoit MARCOUX, Laura MAROT

Compliance letter response template

2023 Commission Meeting			
CPC: EUROPEAN UNION			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	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>	<p>Rec. 16-05: Report on implementation of SWO-MD closure received late.</p>	<p>The EU acknowledges the delayed submission of the report and has implemented the necessary mechanisms to ensure that similar situations are quickly identified and prevented from occurring in the future.</p>	
	<p>Rec. 22-16: Report on eBCD derogation received late.</p>	<p>The report on the EU eBCD derogation was submitted to the ICCAT Secretariat on 6 October, five days after the official deadline of 1 October. The EU acknowledges this slight delay, which was partially due to difficulties in downloading the necessary reports from the eBCD system during the period we were working on it.</p> <p>Nevertheless, being mindful of the delay, the EU made efforts to minimize its impact on the ICCAT Secretariat by submitting a track-changes version of the report based on last year's document held by the Secretariat. This was intended to ease</p>	

		<p>the work of translators and facilitate the review process.</p> <p>We would like to note that in previous years, and in 2024 already, the report has been submitted on time.</p>	
CATEGORY C			
<i>MCS-species related</i>			
<i>MCS-general: Port Controls</i>			
<i>Vessel Controls</i>			
OTHER	<i>Date sent:</i>	<i>Template completed?</i>	<i>Explanation received?</i>
Response to COC Chair letter from previous year?			
MITIGATING CIRCUMSTANCES	<i>Request made to:</i>	<i>Date request sent:</i>	<i>Request approved/rejected</i>
Request for Capacity Building (indicate fund/type)			

EU reply to the letter on compliance issues 2023 – S24-09310**1. Update on Tarantelo investigation**

In relation to the court case, the Criminal Department of the State Attorney's Office has informed of the Order of Abbreviated Proceedings, issued on July 8, 2024, by which, once the preliminary proceedings phase is over, the parties are given notice to request either the opening of the oral trial or the dismissal of the case. In this order, the investigated facts are provisionally qualified as constituting the following crimes:

- Documentary forgery.
- Crime against public health.
- Crime against fauna.
- Crime against consumers' rights.
- Crime of discovery and revelation of secrets.
- Crime of participation in a criminal organization.
- Crime of money laundering.

In relation with the possible infringement procedures by the Spanish fisheries authorities, it is recalled that there is a primacy of the criminal order over the administrative order, in such a way that when the Administration becomes aware of the existence of a criminal proceeding, it must request information from the judicial body on the actions carried out to determine if there is identity of fact, subject and basis, and if so, it must suspend the administrative proceeding.

For this reason, it was agreed to initiate 3 administrative sanctioning proceedings in the Valencia, Murcia and Cadiz Fisheries Inspection Units, in order to avoid the statute of limitations of the administrative infringements, which cannot be sanctioned until the criminal proceedings are resolved. The Agreements to initiate these administrative sanctioning proceedings were adopted during the month of December 2019, and all of them are currently suspended.

2. Footnote in Compliance table COC_304/2023 to blue marlin compliance data

The EU informed the Compliance Committee at its annual 2023 meeting that the codification issue related to blue marlin was under analysis, and that necessary actions would be taken thereafter. This includes the submission of a revised data series to the SCRS, along with the methodology that underpinned the revisions. The revised data series covering years 2018 to 2022 and alongside with the methodology have been submitted on 12 September 2024 (for the period 2018-2021) and on 10 November 2023 (for 2022). This methodology must undergo peer review to assess its soundness and the quality of the results. Only after this review will the EU be able to determine how much of those catches have been landed and, therefore, should be considered for revising the quota uptake figures.

Once the feedback from the scientific peer reviewing concludes, the EU will engage internally with the relevant authorities to take further action.

In light of the above, the footnote related to this issue should remain in the 2024 Compliance tables document and until the process is concluded. The EU is available to provide any additional details the Compliance Committee considers relevant or necessary.



REPUBLIC OF GHANA

**FISHERIES
COMMISSION**

**P. O. Box GP 630, Accra-Ghana
Digital Address: GA-079-5564**

Kindly quote this number and date on all correspondence

My Ref. No. FC/10/V-6/66

Your Ref. No. _____

OCTOBER 9, 2024

RE: RESPONSE TO COMPLIANCE LETTER

The Fisheries Commission presents its compliments to the Executive Secretary of the International Commission for the Conservation of Atlantic Tuna (ICCAT) and forwards the attached responses for your perusal.

Please accept the assurances of my highest consideration.

**FRED KWASI ANTWI-BOADU
HEAD DELEGATE FOR GHANA
(EXECUTIVE DIRECTOR)**

**THE EXECUTIVE SECRETARY
ICCAT SECRETARIAT
MADRID - SPAIN**

Email: info@fishcom.gov.gh
Website: www.fish.com.gov.gh

Appendix 1

Compliance letter response template

2023 Commission Meeting			
CPC: GHANA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	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>	<p>Rec. 14-07: Clarification needed regarding access agreements (Ghana's 2023 reply letter to COC Chair stated that they inadvertently indicated in their 2022 annual report that some vessels were licensed under access agreements. Ghana also stated that the owners of these vessels acquired a foreign license to operate in Ghana's waters. Ghana is requested to provide further clarification).</p>	<p>These vessels are foreign-flagged and acquired the license to operate in our jurisdiction.</p> <p>The arrangement Ghana has with these vessel owners (Belize and Spain-flagged vessels) is exhibited in paragraph 6 of Rec. 14-07, that is, the CPC involved in this arrangement submits the relevant information to ICCAT accordingly. Attached to this template is the relevant information (Rec. 14-07 - Compliance letter response) and accompanying agreements.</p>	
	<p>Rec. 18-06: Unclear and insufficient responses in shark check sheet for silky, hammerhead, and oceanic white tip.</p>	<p>All shark species encountered during fishing activities by tuna vessels are treated as an endangered species of fish and as such handled by ensuring they are released promptly alive. The release of these is documented by trained domestic observers onboard the vessels. Moreover, the crew are also trained through the annual ISSF workshop (skippers workshop) which outlines the importance of releasing these species as an obligation. Ghanaian vessels are registered in the ISSF database and these are also requirements needed for renewal as part of compliance. This information is embedded in our domestic observer report.</p>	<p>30/07/2022</p> <p>Observers trained to ensure prompt release of species caught alongside vessel.</p>

	<p>Shark check sheet responses appear to claim both implementation and exceptions with respect to the hammerhead (Rec. 10-08) and silky shark (Rec. 11-08) retention bans, while also while noting the lack of any “explicit, inherent regulations” for these species. Ghana is requested to clarify this matter.</p>	<p>These species when caught are consumed locally. As indicated in paragraph 3 and 4 of Rec. 10-08 and 11-08 respectively, Ghana submits data to ICCAT and Ghana will need to write for an exemption (yet to be done).</p> <p>The Fisheries Law (Act 625) as amended has provisions for managing these species, and also adhering to and implementing international conventions and best practices that seek to sustainably manage the resource.</p>	<p>30/07/2022</p> <p>Continuous monitoring by coastal fisheries officers. Data being collected continuously onboard purse seine. LI 1968 of 2010.</p>
	<p>Shark check sheet response asserting that oceanic whitetip sharks (Rec. 10-07) are not found in Ghana’s waters is not a valid response as no exemption has been obtained from SCRS pursuant to the process set forth in para. 3 of Rec. 18-06.</p>	<p>As per our data, none has been identified in our jurisdiction. However, Ghana will be available to collaborate with CPCs with the capacity to undertake research or provide us with any information regarding this species in our waters to inherently build the capacity of our scientists.</p> <p>That notwithstanding, Ghana will need to obtain an exemption according to the Recommendation.</p>	
CATEGORY C			
<i>MCS-species related</i>			
<i>MCS-general: Port Controls</i>	<p>Rec. 16-14: More information on implementation of scientific observer programme needed.</p>	<p>The domestic observer program is currently implemented on all Ghanaian-flagged bait boats and purse fishing vessels.</p> <p>Observers are employed and managed by the Fisheries Commission (Fisheries Scientific Survey Division). and taken through various training courses to be qualified and deployed.</p> <p>Their responsibilities are provided in Act 625, which is in accordance with Rec. 16-14; (obtaining daily activities of the vessels, sampling for length (size) frequency, estimating by-catch, endangered species (sharks, turtles) and FADs encountered)</p>	

		<p>Biological samples are not collected for our observer program.</p> <p>There are some challenges with the observer program particularly the use of Microsoft Excel sheets for data analysis and storage. We therefore wish to take advantage of the new software developed to enable us to merge all the information (by trips) to allow for detailed analysis.</p> <p>The observers do not collect biological samples because of lack of resources and capacity to undertake the same.</p> <p>There is the need to build additional capacity of both observers and scientists on by-catch/ endangered species (sharks, etc.) estimation, and to train the staff on database management, analyzing historical data in our effort to improve the current system.</p>	
<i>Vessel Controls</i>			
OTHER	<i>Date sent:</i>	<i>Template completed?</i>	<i>Explanation received?</i>
Response to COC Chair letter from previous year?	26/09/2023	No	An oversight as the letter to the COC Chair was forwarded without the template.
MITIGATING CIRCUMSTANCES	<i>Request made to:</i>	<i>Date request sent:</i>	<i>Request approved/rejected</i>
Request for Capacity Building (indicate fund/type)	SCRS regarding challenges with database currently being used (AVDTH by IRD-France).	3/10/2024.	Decision yet to be made.

Compliance letter response template

2023 Commission Meeting			
CPC: GUATEMALA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE	DATE MISSING DATA/INFORMATION SENT (if applicable)
CATEGORY A			
<i>Compliance Tables</i>	Difference between Task 1 and the BET compliance table.	CP-13 is based on estimates from fishing logbooks.	
<i>Capacity, size, gear, time, area restrictions</i>			
CATEGORY B			
<i>Annual Report</i>		It was sent together with the Shark and Billfish Implementation Check Sheets.	10/04/2024
<i>Statistical Data</i>			
<i>Other reports – Shark and Billfish Check Sheets</i>	Rec. 22-01/Rec. 23-01 : Monthly/quarterly reports received late.	The Shark Implementation Check Sheet “M:SHK05” (v. 2024) and Billfish Implementation Check Sheet “M:BIL01” (v. 2024) were sent together with the Annual Report.	10/04/2024
CATEGORY C			
<i>MCS-species related</i>			
<i>MCS-general: Port Controls</i>	Rec. 16-14 : More information is needed on scientific observer programmes.	The fishing plan was submitted.	01/17/2024
<i>Vessel Controls</i>			
OTHER	<i>Date sent:</i>	<i>Template completed?</i>	<i>Explanation received?</i>
Response to COC Chair letter from previous year?	Reply to CoC Chair letter received late.	Yes	10/02/2023 It was resubmitted on 12/11/2023.
MITIGATING CIRCUMSTANCES	<i>Request made to:</i>	<i>Date request sent:</i>	<i>Request approved/rejected</i>
Request for Capacity Building (indicate fund/type)			

Head Delegate of Guinea (Rep.)
Amara Camara KABA
234, Avenue KA 042,
Kaloum commune
Postcode 307, Guinea (Rep.)
Tel: +224 621042758
amaragbe1@yahoo.fr

Conakry, 11 October 2024

Mr Derek Campbell
ICCAT Compliance Committee Chair
Madrid, Spain

Subject: Response to the letter on compliance issues

Chair,

I have the honour to acknowledge receipt of your letter No. S24-06319 ICCAT- SALIDA of 13 September 2024 in which you reminded me of the implementation issues concerning our CPC, the Republic of Guinea. I would like to thank you for this.

In response, I would like to reassure you that since 2023, efforts have been made to correct the reporting deficiencies noted. These efforts have led to the transmission of statistical data reporting forms, billfish and shark check sheets, periodic reports corresponding to Task 1 data for tropical tuna species, details of in-port transshipments and the reasons for the lack of transmission of other requirements that require further efforts. The IOMS system was used to transmit the Compliance table.

Moreover, as part of the rebuilding of the State undertaken by the authorities of the transition that is taking place in our country, other efforts have been made to revise the regulatory framework, train officials and set up a programme to monitor the artisanal and small-scale fishery.

In order to consolidate these efforts and correct the compliance deficiencies, please find attached the completed response template from the letter on compliance and an Action Plan, as required by the Commission.

However, as a developing country with insufficient financial and human resources as well as limited technical means, our CPC would like to benefit from the support of the Commission and its partners in order to respond effectively to all the requirements.

In the hope that the documents submitted will be of interest to you in appreciating the efforts made by our CPC, please accept, Chair, the assurances of my highest consideration.

(signed and sealed)

Amara Camara Kaba
Head Delegate

Attachments:

- *Draft Guinea_republic_template_FRA*;
- *Action plan*.

CC: Mr E. Penas Lado, Commission Chair

Compliance letter response template

2023 Commission Meeting			
CPC: GUINEA (REP.)			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE	DATE MISSING DATA/INFORMATION SENT (if applicable)
CATEGORY A			
<i>Compliance Tables</i>	Rec. 11-11. Compliance tables not received.	The available data were entered into the IOMS.	10 October 2024.
<i>Capacity, size, gear, time, area restrictions</i>	Rec. 22-12: No information on implementation of the measure on turtles.	A monitoring programme has been implemented within the National Centre for Fisheries Science in Boussoura (CNSHB). This programme is responsible for collecting the relevant information. Bycatch data have been communicated: 7 TTL individuals were caught and released alive, and the sum of their size is 505 cm. In addition, 4 TTX individuals were caught and released alive, and the sum of their size is 192 cm.	
CATEGORY B			
<i>Annual Report</i>	Annual report received late.	The national team responsible for monitoring the implementation of measures will overcome administrative delays and be proactive in 2025.	
<i>Statistical Data</i>	Rec. 16-14: No information on implementation of the scientific observers programme. Form ST-09 not received.	A capacity-building programme for observers has been implemented within the National Centre of Fisheries Surveillance and Policing (CNSP). Embarkation of observers is one of the essential conditions for access to the resource. No sampling at sea was carried out by the observers on board the only (1) purse seiner flying the flag of the Republic of Guinea. However, capacity building for observers is needed so that all the relevant information from ST-09 can be provided. This is why the CNSHB has been asked to train national observers.	
<i>Other reports – Shark and Billfish Check Sheets</i>	Rec. 18-05 and Rec. 18-06. Shark Check Sheet not received.	The Check Sheet was submitted to the Secretariat.	8 October 2024

CATEGORY C			
<i>MCS-species related</i>	Rec. 21-01: Task 1 data for tropical tuna species submitted in 2022, but not the corresponding periodic reports.	The periodic reports for 2022 were submitted to the Secretariat.	23 September 2024
<i>MCS-general: Port Controls</i>	Rec. 21-15: No information on transhipments in port.	Information on transhipments was submitted to the Secretariat through form CP58.	8 October 2024.
<i>Vessel Controls</i>		Vessels flying our CPC's flag must have fully operational VMS equipment and an observer on board in order to access the resource.	
OTHER	<i>Date sent:</i>	<i>Template completed?</i>	<i>Explanation received?</i>
Response to COC Chair letter from previous year?	No response to the COC Chair letter following the 2022 Annual Meeting.	No	The steps have been taken to transmit statistics and Check Sheets, which should ensure that there is no lack of response in the future.
MITIGATING CIRCUMSTANCES	<i>Request made to:</i>	<i>Date request sent:</i>	<i>Request approved/rejected</i>
Request for Capacity Building (indicate fund/type)	ICCAT Secretariat	27 September 2024.	The CPC is awaiting the response of the review panel.

Compliance letter response template

2023 Commission Meeting			
CPC: ICELAND			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
CATEGORY A			
<i>Compliance Tables</i>	Rec. 11-11 : Compliance tables received late.	Submitted.	02.10.2023.
<i>Capacity, size, gear, time, area restrictions</i>			
CATEGORY B			
<i>Annual Report</i>	Annual Report received late.	Submitted.	03.10.2023.
<i>Statistical Data</i>	Statistical data received late (2 October).	Submitted.	02.10.2023.
<i>Other reports – Shark and Billfish Check Sheets</i>	Rec. 18-06 : Shark check sheet received late.	Iceland had already sent in relevant check sheets in 2021. Re-submitted.	12.11.2023.
CATEGORY C			
<i>MCS-species related</i>			
<i>MCS-general: Port Controls</i>			
<i>Vessel Controls</i>			
OTHER			
	Date sent:	Template completed?	Explanation received?
Response to COC Chair letter from previous year?			
MITIGATING CIRCUMSTANCES			
	Request made to:	Date request sent:	Request approved/rejected
Request for Capacity Building (indicate fund/type)			



FISHERIES AGENCY

MINISTRY OF AGRICULTURE, FORESTRY AND FISHERIES, GOVERNMENT OF JAPAN

1-2-1, Kasumigasaki, Chiyoda-ku, Tokyo 100-8907, Japan

30 October, 2024

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

Dear Mr. Campbell,

I refer to your letter dated 13 September, received on 25 October 2024, regarding Japan's compliance deficiencies with ICCAT requirements. Japan has addressed the compliance deficiencies through the appropriate domestic process to prevent a recurrence.

Please find attached our response indicating the remedial action.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shingo Ota', written on a light-colored background.

Shingo OTA
Japan's Commissioner to ICCAT

Compliance letter response template

2023 Commission Meeting			
CPC: JAPAN			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE	DATE MISSING DATA/INFORMATION SENT (if applicable)
CATEGORY A			
<i>Compliance Tables</i>			
<i>Catch, capacity, size, gear, time, area restrictions</i>	Rec. 22-06: Overharvest of ALB-S (47 t).	<p>The Fisheries Agency of Japan (FAJ) has required Japanese fishing vessels to record and submit two (2) types of catch reports (periodical catch report and logbook).</p> <p>FAJ monitors catch status through the periodical catch report, however, two (2) fishing vessels failed to submit a part of their catch reports for ALB-S in the 2022 fishing season because of oversight, while the catches were recorded and reported through their logbooks.</p> <p>Once total amount of harvest reaches 85% of Japan's catch limit of ALB-S, FAJ allocates remaining limits for individual vessel to avoid over harvesting. In 2023 fishing season, FAJ decided not to allocate the remaining to the 2 fishing vessels as a penalty for the miss reporting.</p> <p>The periodical catch report system was integrated into the electronic logbook system in 2024 which allows FAJ monitoring the harvest periodically. Through this system, this type of issue will not occur in the future.</p>	
	Rec. 19-05: Overharvest of BUM (43 t).	<p>The Fisheries Agency of Japan (FAJ) has required Japanese fishing vessels to record and submit two (2) types of catch reports (periodical catch report and logbook).</p> <p>FAJ monitors catch status through the periodical catch report, however, fifteen (15) fishing vessels failed to submit the catch reports for BUM in the 2022 fishing season,</p>	

		<p>while the catches were recorded and reported through their logbooks. This is because BUM was coded differently between two records: “blue marlin” in the logbook and “Atlantic blue marlin” in the periodical catch report. The 15 vessels did not include their BUM catches in the periodical catch reports, but in the logbook because they recognized their catches as “blue marlin” not “Atlantic blue marlin.”</p> <p>FAJ instructed fishers that blue marlin caught in the Atlantic Ocean must be reported as Atlantic blue marlin in the periodical catch report.</p> <p>The periodical catch report system was integrated into the electronic logbook system in 2024, which allows FAJ to monitor the harvest periodically. Through this system, this type of issue will not occur in the future.</p>	
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	<i>Date sent:</i>	<i>Template completed?</i>	<i>Explanation received?</i>
Response to COC Chair letter from previous year?			
MITIGATING CIRCUMSTANCES	<i>Request made to:</i>	<i>Date request sent:</i>	<i>Request approved/rejected</i>
Request for Capacity Building (indicate fund/type)			

Compliance letter response template

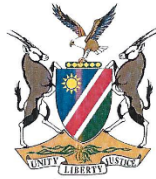
2023 Commission Meeting			
CPC: LIBERIA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
CATEGORY A			
<i>Compliance Tables</i>	Rec. 18-05: No size sheet received with Compliance Tables. Discrepancies between Task 1 and Compliance Tables.	The size sheet has been developed and transmitted to ICCAT for 2022. Regarding the discrepancies between Task 1 and the Compliance Tables, we observed that the statistical reports submitted were wrong due to inadvertent errors. The data have been corrected and transmitted to ICCAT for further action.	Data submitted: September 19, 2024. Registration number: E24-11103.
<i>Catch, capacity, size, gear, time, area restrictions</i>	Rec. 21-03: Continued overharvest of northern swordfish.	Liberia seeks guidance from the Chair of the COC on the reported overharvest because the data submitted to ICCAT for northern swordfish of 493 kilograms do not indicate overharvest.	
	Rec. 19-05: Overharvest of BUM.	We observed that the statistical reports submitted were wrong due to inadvertent errors. The data have been corrected and transmitted to ICCAT for further action. The total catch for BUM was 6004.71 kilograms in 2022. Task 1 and the compliance sheet have been revised and submitted to ICCAT.	Data submitted: September 19, 2024. Registration number: E24-11103.
CATEGORY B			
<i>Annual Report</i>	Annual Report received late.	The late reporting was due to the transition from paper-based reporting to the IOMS online platform. The 2023 report was submitted before the deadline.	

<i>Statistical Data</i>	No ST03 (catch and effort) or ST09 (observer data) received.	Liberia does not have flagged tuna vessels, the two vessels that were flagged to Liberia, were de-flagged in 2022.	
<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: Unclear as to whether minimum standards of scientific observer programme are being met, more information required.	Liberia does not have flagged tuna vessels, the two vessels that were flagged to Liberia, were de-flagged in 2022. However, Liberia has a scientific observer program that collects and reports scientific data when Liberia flagged tuna vessels. The required observer coverage for Liberian-flagged vessels is 100% coverage.	
<i>Vessel Controls</i>			
OTHER	Date sent:	Template completed?	Explanation received?
Response to COC Chair letter from previous year?			
MITIGATING CIRCUMSTANCES			
Request for Capacity Building (indicate fund/type)	Request made to:	Date request sent:	Request approved/rejected

Compliance letter response template

2023 Commission Meeting			
CPC: LIBYA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
CATEGORY A			
<i>Compliance Tables</i>	Rec. 11-11: Differences between Task 1 and Compliance tables SWO-MD, ALB-MD, BFT-E.	Correspondences between CPC Libya and ICCAT Secretariat regarding the differences and corrections were sent.	Sent on 04/10/2023.
<i>Catch, capacity, size, gear, time, area restrictions</i>	Rec. 18-06 (and all relevant species-specific shark Recommendations): No legally binding measures for species specific requirements.	Legally binding measures were mentioned in our shark sheet form (Law 89/14, Decree 35/2023).	Sent on 05/10/2023.
CATEGORY B			
<i>Annual Report</i>	Rec. 18-07 & Rec. 22-17: Annual Report received late and IOMS sections incomplete (no section 3).	Sent on 09/10/2023 and due to errors in our IOMS system we could not submit it correctly. Resent on 18/10/2023, fully completed.	Sent on 09/10/2023. Resubmitted on 18/10/2023.
<i>Statistical Data</i>			
<i>Other reports – Shark and Billfish Check Sheets</i>	Rec. 18-06: Shark reporting check sheet received late.	CPC Libya has no new data for shark sheet. Para 2 of Rec. 18-06.	Sent on 05/10/2023.
CATEGORY C			
<i>MCS-species related</i>			
<i>MCS-general: Port Controls</i>	Rec. 16-14: No scientific observer program.	<ul style="list-style-type: none"> - National observers covered all Towing Vessels. - Purse seiners were fully covered by ROP. - All data collected by NOP were sent to ICCAT. - No BFT Farms in Libya. 	
<i>Vessel Controls</i>			
OTHER	Date sent:	Template completed?	Explanation received?
Response to COC Chair letter from previous year?	04/10/2023	Yes	

MITIGATING CIRCUMSTANCES			
Request for Capacity Building (indicate fund/type)	Request made to: No	Date request sent:	Request approved/rejected



REPUBLIC OF NAMIBIA

MINISTRY OF FISHERIES AND MARINE RESOURCES

Tel: +264612053007
 Enq: D. Bester
 Email: Desmond.Bester@mfmr.gov.na

Private Bag 13355
 Brendan Simbwaye Square, Block C
 Cnr. Dr. Kenneth Kaunda & Goethe Street
 Windhoek, Namibia

Mr. Camille Jean Pierre Manel
 ICCAT Executive Secretary
 Corazon de Maria 8
 28002 Madrid,
 SPAIN

20 September 2024

Derek Campbell
 Compliance Committee Chair

CC: Mr. Penas Lado, Commission Chair,

SUBJECT: RESPONSE TO IDENTIFICATION UNDER ICCAT'S TRADE MEASURES RECOMMENDATION

We are writing in response to your recent communication regarding the identification of specific species under ICCAT's Trade Measures Recommendation. We appreciate the ongoing efforts of ICCAT to ensure sustainable fishing practices and the conservation of marine resources. We recognize the importance of effective trade measures in supporting the goals of the ICCAT framework.

We are committed to compliance with ICCAT's recommendations and understand the critical role that accurate identification plays in promoting responsible fisheries management, measures, practices, or initiatives your organization has adopted to align with ICCAT's guidelines.

Namibia is aware and regrets the discrepancies between data in compliance tables and Task I for Albacore, Bigeye, Swordfish and Blue marlin that were procedurally reported to ICCAT. This is indicative of faulty data reporting; which we believe is double reporting on the Task 1 figures. Ideally, data reported at Task 1 and that reported on the Compliance tables from the same CPC and on the same species must be the same or nearly so. It is our conclusion that the reported discrepancies are due to wrong reporting and not over fishing on the permissible fishing limits for Namibia. As a means to mitigate the state of affairs; a number of measures have been put in place and include:

Training for data capturing staff, reconciliation of captured data between the Ministry and fishing vessels before Task 1& 2 data are submitted to the ICCAT; reduction of fishing vessels

All official correspondence must be addressed to the Executive Director.

on Namibia's quotas; suspension of all foreign fishing vessels in the Namibian EEZ and termination of all affected fishing activities on Namibia's ICCAT fishing possibilities whenever catch limits are reached.

BUM OVERHARVEST

Namibia has noted that the overharvest of BUM could be due to: Species misidentification by the crew (onboard vessels) and fisheries inspectors (at landing site) as well as official landing forms not having provision for species specific columns. Namibia has therefore embarked on training crew, fisheries inspectors as well as fisheries observers on species identification of all large pelagic species.

Namibia, acknowledges that in 2018, ICCAT through the ICCAT/JCAP programme trained 2 fisheries scientists, 5 technical staff, 2 fisheries observers, 1 fisheries statistician and 1 fisheries inspector on the capacity building to improve data collection and reporting on tuna fisheries in Namibia.

Due to covid-19 and other factors such as staff turnover, other personnel could not be trained. However, having noticed that the issue of misidentification is a concern, Namibian scientists embark on ensuring all crew and fisheries inspectors and fisheries observers are trained on properly identifying tuna and tuna-like species. This will include providing species identification guides and ensuring majority of the personnel who work with ICCAT data are well trained.

Efforts to ensure Namibia complies with recommendations have already embarked. For example, in 2022, Namibia redesigned the logbooks to include all landed tuna and tuna-like species and also make provision for other species not included in the logbooks.

As a matter of urgency, Namibia will now embark on redesigning the landing forms (monthly return forms), that are used to record all landings by skippers. The landing forms will be redesigned to include all billfish, as the current form only has provision for blue marlin and does not provide provision for skippers to specify all other billfish caught. It is therefore believed that all billfish caught i.e., longbill spearfish, and others, are grouped under blue marlin on the landing form, hence the high number of blue marlin landings always reported. The redesign exercise will be completed during beginning of 2025.

Namibia believes that the "overharvest of blue marlin" will not occur once the above is completed. We believe that the above-mentioned control and preventative measures would improve data capturing, reporting and compliance to ICCAT conservation management measures.

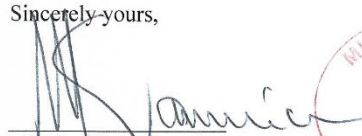
Furthermore, enhance our collaboration with stakeholders in the industry to foster a greater understanding of species identification and the implications of trade measures. We are also open to participating in any workshops or training sessions that may be organized to improve compliance and awareness among our members. We believe that the above-mentioned control and preventative measures would improve data capturing, reporting and compliance to ICCAT conservation management measures.

Please let us know if there are specific actions or additional information you require from us. We look forward to contributing positively to this initiative and supporting ICCAT's objectives.

 2

Thank you for your attention to this matter. We anticipate your guidance and any further instructions you may have.

Sincerely yours,


Mr. Uertjiua. Kauaria
HEAD DELEGATE: NAMIBIA



Compliance letter response template

2023 Commission Meeting			
CPC: NAMIBIA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE 2022 MEETING	DATE MISSING DATA/INFORMATION SENT (if applicable)
CategoryA			
<i>Compliance Tables</i>	<p>Rec. 11-11: Overharvest of ALB-S and BUM, although latter reducing. Discrepancies between Task 1 and Compliance tables for SWO-S, ALB-S and BET.</p>	<p>Namibia is aware and regrets the discrepancies between data in compliance tables and Task 1 for albacore, bigeye, swordfish and blue marlin that were procedurally reported to ICCAT.</p> <p>This is indicative of faulty data reporting, which we believe is double reporting on the Task 1 figures. Ideally, data reported at Task 1 and that reported on the Compliance tables from the same CPC and on the same species must be the same or nearly so. It is our conclusion that the reported discrepancies are due to wrong reporting and not overfishing on the permissible fishing limits for Namibia.</p> <p>As a means to mitigate the present state of affairs; a number of measures have been put in place and include: training for data capturing staff, reconciliation of captured data between the Ministry and fishing vessels before Task 1& 2 data are submitted to the ICCAT, reduction of fishing vessels on Namibia’s quotas; suspension of all foreign fishing vessels in the Namibian EEZ and termination of all affected fishing activities on Namibia’s ICCAT fishing possibilities whenever catch limits are reached.</p> <p>We believe that the above-mentioned control and preventative measures would improve data capturing, reporting and compliance to ICCAT conservation management measures.</p>	

		<p>BUM overharvest</p> <p>Namibia has noted that the overharvest of BUM could be due to: species misidentification by the crew (onboard vessels) and fisheries inspectors (at landing site), official landing forms not having provision for other billfish</p> <p>Namibia has therefore embarked on: training crew, fisheries inspectors as well as fisheries observers on species identification of all large pelagic species.</p> <p>Namibia acknowledges that in 2018, ICCAT through the ICCAT/JCAP programme trained 2 fisheries scientists, 5 technical staff, 2 fisheries observers, 1 fisheries statistician and 1 fisheries inspector on the capacity building to improve data collection and reporting on tuna fisheries in Namibia.</p> <p>Due to COVID-19 and other factors such as staff turnover, other personnel could not be trained. However, having noticed that the issue of misidentification is a concern, Namibian scientists embark on ensuring all crew and fisheries inspectors and fisheries observers are trained on properly identifying billfish. This include providing species identification guides.</p> <p>In 2022, Namibia redesigned the logbooks to include all landed large pelagic species and also make provision for other species not included on the logsheet. Namibia will now embark on redesigning the landing forms (monthly return forms), that are used to record all landings by skippers. The landing forms will be redesigned to include all billfish, as the current form only has provision for blue marlin and does not provide provision for skippers to specify all other billfish caught. It is therefore</p>	
--	--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

		<p>believed that all billfish caught i.e., long bill spearfish, are grouped under blue marlin on the landing form, hence the high number of blue marlin landings always reported. The redesign exercise will be completed beginning of 2025.</p> <p>Namibia believes that the “overharvest of blue marlin” will not occur once the above is completed.</p>	
<i>Capacity, size, gear, time, area restrictions</i>			
Category B			
<i>Annual Report</i>	Some parts of the Annual Report received late.	Updated version submitted during meeting.	14/11/2023
<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	<i>Date sent:</i>	<i>Template completed?</i>	<i>Explanation received?</i>
Response to COC Chair letter from previous year?	23/09/2024		
	COC_312 (Shark Trust).		
MITIGATING CIRCUMSTANCES	<i>Request made to:</i>	<i>Date request sent:</i>	<i>Request approved/rejected*</i>
Request for Capacity Building (indicate fund/type)			

AQUATIC RESOURCES AUTHORITY OF PANAMA
OFFICE OF THE GENERAL ADMINISTRATION

Panama, 24 September 2024
AG-856-2024

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

Dear Chair,

It is my honour to address you, and I would like to extend my greetings to you and to submit Panama's response which is contained in the attached document (PANAMA_TEMPLATE_SPA) entitled "Compliance Letter Response Template", as requested in your letter on compliance-related issues (S24-09334) received on 13 September 2024.

In your letter, we note that you refer to the text of document COC_308_APP_2A_REV/2023 entitled "Compliance Actions developed by COC Chair in consultation with Friends of COC Chair Group" of 19 November 2023, which contains the following text in red for Panama.

Text in the document for Panama: "Letter on late reporting, while noting improvement. **Compliance letter response template not used.** Follow-up on matters not addressed in response to last year's COC Chair letter."

As regards the foregoing, Panama reiterates its request for removal of the text referred to above, as requested during the Compliance meeting and the 2023 annual meeting of the Commission. This request was sustained by Panama, and in turn, submission of the information was confirmed by the Secretariat, and therefore the change was accepted in both meetings. Further to this, Note AG-997-2023 of 4 December was also submitted, the fourth point of which refers to removal of the text from document COC_308_APP_2A_REV/2023.

Panama would like to take this opportunity to resubmit the email sent on 14 September 2023 and received by the Secretariat which contains Panama's response to the Chair's letter on compliance issues (S23-08386). This response was sent in the established format with file name PANAMA_SPA_ATTACH.

Panama would also like to take this opportunity to reiterate its commitment to compliance with the management and conservation measures that govern the Commission. And in this regard, we request that this document contain the correct information on our compliance.

Please find reattached the following documents:

1. Note AG-997-2023
2. Email sent to the Secretariat on 14 September 2023.

With the assurances of my highest consideration and respect.

Regards,

(signed and sealed)

Eduardo Carrasquilla D.
General Administrator

CC: ICCAT Secretariat

Compliance letter response template

2023 Commission Meeting			
CPC: PANAMA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE 2022 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 – Shark and Billfish Check Sheets</i>	Rec. 21-01 and Rec. 22-01: Tropical tunas fishing plan received late.	The delay was due to amendments to the domestic regulations on tropical tunas within ICCAT, which relate to requirements in the fishing plan.	27/02/2023
Category C			
<i>MCS-species related</i>			
<i>MCS-general: Port Controls</i>			
<i>Vessel Controls</i>			
OTHER	Date sent:	Template completed?	Explanation received?
Response to COC Chair letter from previous year?			
MITIGATING CIRCUMSTANCES	Request made to:	Date request sent:	Request approved/rejected
Request for Capacity Building (indicate fund/type)			

REPUBLIC OF SENEGAL
Ministry of Fisheries and Maritime Economy
Maritime Fisheries Directorate

Ref. 000895

Dakar, 8 October 2024

To Mr Derek Campbell
Chair of the ICCAT Compliance Committee

Subject: Letter of identification within the framework of the *Recommendation by ICCAT Concerning Trade Measures*

Reference: V/L ICCAT-SALIDA N° S24-09359/2024/ of 16/09/2024

Chair,

I acknowledge receipt of your letter referred to above in which you inform me that the identification of Senegal under the *Recommendation by ICCAT Concerning Trade Measures* (Rec. 06-13) was maintained at the 28th regular meeting held from 13 to 20 November 2023 on the grounds of reporting deficiencies.

In response, please find herewith response table and comments on the points raised below.

The discrepancies between Task 1 and the Compliance tables for BET, BUM and WHM have been corrected.

The possible overharvests of northern albacore (N. ALB) in previous years raised by the EU are NOT YET proven and internal investigations are ongoing to clarify the issue. Consequently, at this stage, this possibility cannot be considered as a non-compliance.

The overharvest of bigeye tuna has been resolved since the adoption of Recommendation 23-01 on payback of overharvest of bigeye tuna by the Commission in November 2023. ST09 for 2024 has been submitted to the Secretariat. For Task 1 data (Rec. 21-01), concerning tropical tuna species, periodic reports are not submitted. Installation of electronic logbooks on board tuna vessels will facilitate these submissions from 2025.

As regards Rec. 18-06 on legally binding domestic measures: it involves transposing the relevant recommendations into Orders to facilitate their implementation. However, transposition may take some time.

As for the scientific observers programme (Rec. 16-14), Senegal has continuously pointed out that its observer programme includes a scientific component but that it is experiencing difficulties in implementing it, mainly due to a lack of observers and capacity. A solution is being sought through recruitment of new observers, for who training courses are currently being organised.

The action plan, which clearly describes the measures to be taken to resolve the above issues, was submitted to ICCAT in April 2024.

Senegal remains committed to improving its level of compliance with ICCAT recommendations and reporting requirements.

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

cc :MPIMP (ATCR)

(Signed and sealed)
Ismaila Ndiaye

Compliance letter response template

2023 Commission Meeting			
CPC: SENEGAL			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
CATEGORY A			
<i>Compliance Tables</i>	Differences between Task 1 and the Compliance tables for BET, BUM and WHM.	These differences are due to data collection and processing. The data have been corrected and transmitted to the Secretariat.	ST01 to ST04: 31 July 2023 Compliance table: 16 August 2023. Corrections of BUM data: 17 August 2023.
<i>Capacity, size, gear, time, area restrictions</i>	Rec. 22-01 : Overharvest of BET.	<ul style="list-style-type: none"> - Reduction of capacities, - Approval by ICCAT of the 2022 bigeye payback plan, - Implementation of the electronic catch reporting system onboard tuna vessels (completed for purse seiners and in progress for baitboat), which will enable better monitoring of catches and limits. 	
	Rec. 21-04 : Possible overharvest of northern albacore (ALB-N) during the previous years, as indicated by the trade documents.	Ongoing enquiry to determine if there has been overharvest of ALB-N.	
CATEGORY B			
<i>Annual Report</i>	Annual Report received late.	Reporting constraints related to weaknesses in teams. Solutions are being sought.	Management part: 15/09/2023 Statistics part: 21/09/2023 21/08/2023.
<i>Statistical Data</i>	Rec. 16-24 : ST09 not received.	ST 09 submitted.	12/11/2023.
<i>Other reports – Shark and Billfish Check Sheets</i>			
CATEGORY C			
<i>MCS-species related</i>	Rec. 18-06 : More details required on the binding domestic measures.	Senegal submitted the shark check sheet, having completed the additional fields added by the Secretariat.	For 2023: 12/09/2023.

	Rec. 21-01 : Task 1 on tropical tuna species submitted in 2023, but not the corresponding periodic reports.	The periodic reports were not submitted but in 2025 with the electronic reporting system that has been installed on vessels fishing for tropicals, submission could improve.	
<i>MCS-general: Port Controls</i>			
<i>Vessel Controls</i>			
OTHER	<i>Date sent:</i>	<i>Template completed?</i>	<i>Explanation received?</i>
Response to COC Chair letter from previous year?	Response to Chair letter; no action plan has been provided.	Senegal submitted an action plan to the Secretariat with the COC Chair in copy (email of 18 April 2024). A response to the Chair letter was submitted with the response template.	8/04/2024 In 2023: 29/09/2023. 08/10/2024 (for 2024).
MITIGATING CIRCUMSTANCES	<i>Request made to:</i>	<i>Date request sent:</i>	<i>Request approved/rejected</i>
Request for Capacity Building (indicate fund/type)	In progress with some ICCAT CPCs.		

Compliance letter response template

2023 Commission Meeting			
CPC: SOUTH AFRICA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
CATEGORY A			
<i>Compliance Tables</i>	Rec. 18-07 : Compliance tables received late. Difference between Task 1 and Compliance tables for ALB-S.	<p>Regrettably, there was an oversight on the part of our administration staff responsible for data submission. We're confident that ICCAT records can verify our consistent compliance with reporting requirements. Suffice to say, the Compliance tables were submitted two days after the set deadline.</p> <p>A correction was made regarding an error in the entry of the 2022 catch, and the necessary adjustments have been applied to the compliance table to ensure accuracy.</p>	Revised 2023-11-13.
<i>Capacity, size, gear, time, area restrictions</i>			
CATEGORY B			
<i>Annual Report</i>			
<i>Statistical Data</i>	No ST-01 (fleet characteristics) received.	It was an oversight as all the statistical data were submitted on 31 July 2023.	Data sent on 2023-11-13.
<i>Other reports – Shark and Billfish Check Sheets</i>	Rec. 18-06 : More detail on legally binding domestic measures to implement ICCAT shark measures required.	<p>In the future, more detailed information on legally binding domestic measures to implement ICCAT shark conservation regulations will be incorporated into the Shark Check sheet.</p> <p>At present, all shark conservation measures in South Africa are enforced through permit conditions established under the Marine Living Resources Act (1998), which provides the most effective framework for ensuring the implementation of shark protection regulations.</p>	

		<p>South Africa demonstrates a strong commitment to shark conservation and management, exemplified by its comprehensive National Plan of Action (NPOA), most recently updated in 2022. This plan has undergone both internal reviews and evaluations by an international panel, affirming its robustness.</p> <p>The following shark protection measures are incorporated into the permit conditions for tuna fisheries. It is crucial to emphasize that these permit conditions are legally binding and enforceable. Non-compliance constitutes a direct violation of the permit and will result in the imposition of punitive measures, which may include administrative fines, suspension or revocation of the permit, and potential criminal prosecution under the applicable laws.</p> <p>These permit conditions are established under the authority of Section 14 of the Marine Living Resources Act, Act No. 18 of 1998. As such, they carry the full force of law, ensuring that all rights-holders strictly adhere to conservation and management measures aimed at protecting shark species in line with national legislation and South Africa's international obligations:</p> <ul style="list-style-type: none"> - Prohibition on the retention of silky sharks, dusky sharks, hammerhead sharks, and thresher sharks. - Ban on the use of wire tracers. - Prohibition on shark finning, extended to include batoids across most fisheries. 	
--	--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

		<ul style="list-style-type: none"> - Mandatory 100% observer coverage for vessels targeting sharks (defined as more than 50% shark catch in one quarter). - Mandatory collection of data on the discard and release (including the condition upon release) of ETP (endangered, threatened, and protected) species. <p>These changes in permit conditions have successfully reduced pelagic shark catches from 1,000 tons to below 150 tons between 2016 and 2024, in both the IOTC and ICCAT regions of competence. The significant reduction in shark targeting primarily occurred over a five-year period.</p> <p>Lastly, it is important to note that all of South Africa's shark conservation and management initiatives are legally binding and fully compliant with ICCAT shark reporting requirements.</p>	
CATEGORY C			
<i>MCS-species related</i>			
<i>MCS-general: Port Controls</i>	Submission from the European Union regarding possible non-compliance with ICCAT Conservation and Management Measures – South Africa	<p><i>(a) The mechanism which is in place in South Africa to avoid imports from vessels on the IUU list (the vessel and its IMO number were on the ICCAT IUU list, and yet the imports were accepted)</i></p> <p>South Africa has established a comprehensive regulatory framework designed to prevent the importation of illegal, unreported, and unregulated (IUU) fish, in accordance with national legislation and its obligations as a Cooperating Contracting Party to multiple tuna Regional Fisheries Management Organisations (tRFMOs), including ICCAT. This framework is governed by South African national</p>	

		<p>legislation, in the form of the Marine Living Resources Act, 1998 (Act No. 18 of 1998), which requires importers to obtain a valid import permit. The permit is contingent on rigorous compliance checks conducted by Fisheries Compliance Officers and Customs Authorities. These checks encompass verifying the legality of the catch, vessel registration, and ensuring that the vessel is not listed on any RFMO IUU lists.</p> <p>In addition, South African authorities regularly cross-check information with the Food and Agriculture Organisation's (FAO) Global Record of Fishing Vessels, Refrigerated Transport Vessels, and Supply Vessels database, along with IUU lists from relevant RFMOs, to further safeguard against the importation of fish or fish products from IUU-listed vessels.</p> <p>In the specific case of the vessel Halifax, while it was listed on the ICCAT IUU list at the time of import, South African importers were unaware of this status, having conducted their own IUU verification checks on the vessel prior to the vessel being listed on the ICCAT IUU list. The vessel was legally registered under Namibian jurisdiction, and all documentation provided by Namibian Competent Authorities reflected proper authorization. The oversight occurred due to reliance on the documentation issued by Namibian authorities, who had cleared and approved the export of the fish to South Africa. Additionally, the fish or fish products were cleared and exported by Novaship Namibia on behalf of the importer.</p>	
--	--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

		<p><i>(b) The corrective measures that South Africa has adopted to avoid the repetition of this issue</i></p> <p>South Africa has conducted a thorough review of its import procedures to strengthen safeguards against similar oversights in the future. Although the current import control systems are comprehensive, the incident involving the Halifax vessel highlighted the need for additional (and time sensitive) verification steps, particularly regarding IUU-listed vessels.</p> <p>Going forward, South Africa will implement the following corrective measures: Enhanced Import Permit Requirements: South African authorities will require importers to provide verifiable proof that the exporting vessel is not listed on any IUU lists of relevant tRFMOs before an import permit can be issued. This will involve checking both the FAO Global Record and RFMO IUU vessel lists at multiple points and/or times during the importation process.</p> <p><i>(c) The sanctions that have been imposed on the importer and the final destination of the fish (information provided by South Africa in COC_309/2023 refers to the fish being "isolated pending the outcomes of the investigation on this matter")</i></p> <p>Following South Africa's internal investigation and further representations at the annual ICCAT meeting in November 2023, the delisting of the Halifax from the ICCAT IUU list played a pivotal role in determining the final resolution of this matter. The removal of the</p>	
--	--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

		<p>vessel from the IUU list indicated that, from ICCAT's perspective, the circumstances no longer justified punitive action. Consequently, the South African Competent Authorities deemed the matter resolved.</p> <p>Given the findings of the investigation, no formal sanctions were imposed on the importer, as they acted in compliance with the information available at the time of import. The fish, which had been isolated during the investigation, was subsequently cleared and released for domestic consumption once the case was closed.</p> <p>South Africa reaffirms its commitment to full compliance with ICCAT's conservation and management measures and has implemented enhanced procedural safeguards to prevent a recurrence of similar issues, ensuring rigorous oversight and verification.</p>	
<i>Vessel Controls</i>			
OTHER	<i>Date sent:</i>	<i>Template completed?</i>	<i>Explanation received?</i>
Response to COC Chair letter from previous year?			
MITIGATING CIRCUMSTANCES	<i>Request made to:</i>	<i>Date request sent:</i>	<i>Request approved/rejected</i>
Request for Capacity Building (indicate fund/type)			



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

RICHMOND HILL
 KINGSTOWN
 VC0120

St. Vincent and the Grenadines

Ref: ARTFF/

Date: 11th October, 2024.

Mr. Derek Campbell
 Compliance Committee Chair
 International Commission for the Conservation of Atlantic Tunas
 Corazón de Maria, 8
 Madrid
 Spain

Dear Mr. Campbell,

SUBJECT: RESPONSE FOR LETTER OF IDENTIFICATION UNDER ICCAT'S TRADE MEASURES RECOMMENDATION

Saint Vincent and the Grenadines acknowledges receipt of your letter on behalf of Identification under ICCAT's Trade Measures Recommendation. Regarding the harvest of southern swordfish without a quota and the catch of undersized swordfish. Please note that these catches were incidental and the vessels responsible have since been deregistered.

Regarding the ST01 Form, please note that the last ST01 Form sent covered the period 18/11/2021 to 31/05/2022. After the 31/05/2022 Saint Vincent and the Grenadines did not authorize any tuna longline vessels to fish for Atlantic tuna. Regarding the ST09 Form, due to travel restrictions imposed by Covid-19 pandemic of 2020, no observer has been deployed in keeping with ICCAT's own approach of not deploying Regional Observers onto carrier vessels. This carried into the earlier half of 2022 when the vessels fished for a few months. Also, in 2021 the High Seas vessels were chartered with Namibia. Saint Vincent and the Grenadines would like to acknowledge that the shark check sheet was received late. This was due to an oversight. As indicated in your letter, when the Shark Check Sheet was identified as missing during the meeting, it was sent as soon as possible, and was received while the meeting was still occurring. If there were indications that the vessels were chartered in 2022 in the Annual Report then this was due to an oversight. Saint Vincent and the Grenadines will like to indicate via this letter that in 2022, none of its high seas vessels was chartered to another state.

Saint Vincent and the Grenadines submitted the monthly catches for 2022 on the 10th October 2024. Regarding the implementation of Rec. 16-14, please note that in order to ensure further compliance with local, regional and international conservation measures Saint Vincent and the Grenadines is going through a process of restructuring its management regimes. This includes the

Tel: (784) 456-1410 or (784) 456-1111 Ext. 5301 • E-mail: office.agriculture@mail.gov.vc

drafting of a new Fisheries Act, the proposed drafting of a Fleet Policy via a World Bank funded project and the one that is most relevant to ICCAT, the deregistration of its High seas fishing fleet which took place in 2022. Hence, for now there are no High seas vessels, only small scale artisanal undecked vessels generally less than 10 metres in length that fish within the EEZ. These vessels fish for less than twelve hours daily and their catch is inspected by Fisheries Data Collectors upon return to a landing site.

The artisanal fleet does not have the capacity to fish in the southern Atlantic; therefore, the deregistration of the High seas vessels has eliminated the risk of the harvesting of southern swordfish. Also, note that any southern swordfish catches for the entirety of 2021 and parts of 2020 are to be counted against the quota of Namibia and not Saint Vincent and the Grenadines. This is in keeping with ICCAT Recommendation 13-14, provision 5 that states, "Catches taken pursuant to the chartering arrangement of vessels that operate under these provisions shall be counted against the quota or fishing possibilities of the chartering Contracting Party."

Regarding no catch of white marlin being reported for 2022. This was because of reduced effort from the High Seas vessels. These vessels only fished from January to May in that year and there were only four vessels fishing that year.

The different bodies of ICCAT can be assured that the failure to respond to the Compliance Committee Chair's letter of 2023 was not an attempt to undermine the work of the Commission or evade ICCAT's oversight. It was rather due to an unintended and rather unfortunate oversight. Saint Vincent and the Grenadines stands committed in ensuring that its citizens and partners engage in sustainable fishing practices that will ensure the long-term survival of the planet's species and their populations.

Regards,



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

Appendix 1

Compliance letter response template

2023 Commission Meeting			
CPC: ST. VINCENT & GRENADINES			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
CATEGORY A			
<i>Compliance Tables</i>	Rec. 17-03 : Continued harvest of southern swordfish without a quota.	These catches were incidental. The high seas vessels responsible for these overharvests were deregistered as of 4 October 2022. St. Vincent and the Grenadines is committed to ensuring strict adherence to quotas moving forward.	
<i>Capacity, size, gear, time, area restrictions</i>	Rec. 21-03 , Rec. 17-02 , Proportion of undersize fish in both North and South catches significantly over the tolerance level.	These catches were incidental. The high seas vessels responsible for these overharvests were deregistered as of 4 October 2022. St. Vincent and the Grenadines is committed to ensuring strict adherence to quotas moving forward.	
CATEGORY B			
<i>Annual Report</i>			
<i>Statistical Data</i>	No ST01 (fleet characteristics) received.	The last ST01 Form sent covered the period 18/11/2021 to 31/05/2022. After 31/05/2022, St. Vincent and the Grenadines did not authorize any tuna longline vessels to fish for Atlantic tuna.	
	No ST09 (observer data) received	Due to travel restrictions imposed by the COVID-19 pandemic of 2020, no observer has been deployed in keeping with ICCAT's own approach of not deploying Regional Observers onto carrier vessels. This carried into the earlier half of 2022 when the vessels fished for a few months. Also, in 2021 the high seas vessels were chartered with Namibia.	
<i>Other reports – Shark and Billfish Check Sheets</i>	Rec. 18-06 : Shark check sheet received late (during meeting).	The late receipt of the Shark Check Sheet was due to an oversight. As indicated in your letter, it was sent as soon as possible, during the meeting, when it was identified as missing.	

	Rec. 13-14 : Indication of chartered vessels in Annual Report but no information sent at time of chartering in 2022; arrangements expired in 2021.	This may have been due to an oversight. St. Vincent and the Grenadines did not charter any fishing vessel to another State in 2022.	
CATEGORY C			
<i>MCS-species related</i>	Rec. 21-01 : Task 1 for tropical species in 2022 but no corresponding periodical reports submitted.	St. Vincent and the Grenadines submitted the monthly catches for 2022 on the 10 October 2024.	
<i>MCS-general: Port Controls</i>			
<i>Vessel Controls</i>			
	Rec. 16-14 : Additional information needed regarding implementation of Rec. 16-14 .	The high seas fishing fleet was deregistered in 2022. Hence, for now there are no high seas vessels, only small scale artisanal undecked vessels generally less than 10 metres in length that fish within the EEZ. These vessels fish for less than twelve hours daily and their catch is inspected by Fisheries Data Collectors upon return to a landing site.	
OTHER	<i>Date sent:</i>	<i>Template completed?</i>	<i>Explanation received?</i>
Response to COC Chair letter from previous year?	11/10/2024	Yes	Yes
MITIGATING CIRCUMSTANCES	<i>Request made to:</i>	<i>Date request sent:</i>	<i>Request approved/rejected</i>
Request for Capacity Building (indicate fund/type)			

Dear Sir,

Referring to your mail dated 13 September 2024 regarding deficiencies for Syria in certain statistical data, we would like to clarify the following:

- Fishing in Syria is traditional, and vessels traditionally operate in territorial water and are not equipped to target tuna species.
- The majority of fishing vessels belong to the artisanal sector, the marine fleet consists of 1850 feluccas (open boats of 4–6 m in length), distributed all along the coast where there are suitable places to beach them or in the small fishing ports.
- Most of the feluccas operate very near to the coast (up to 2 km) and near to the points where they are usually beached.
- A variety of fishing gears are used in this mixed-species fishery, including trammel nets for bottom fishing, bottom longlines, gillnets, shore seines, cast nets, small purse seines, bottom-set nets and handlines. Trawling is forbidden along the coast up to 5.5 km from shoreline.
- Only two Syrian vessels more than 20 m length and recorded in ICCAT record of vessels, one of them conduct BFT fishing activities each year to catch Syrian allocated quota, the total quota transferred for farming purpose in accordance with ICCAT recommendations in the last two years.
- According to Rec. 16-14 Para 4 b and due to the fact that majority of fishing vessels belonging to the artisanal sector the national observer program for sampling from the fleet was implemented by distributing observers in all landing centers on Syrian coast to monitor and record catch of all landed boats, the data collected through this program have been used to quantify the composition, disposition, and quantity of the total catch of fisheries in Syria.
- Because of illegal sanctions and scarcity of all fishing equipment since 2011, there is less interest in investing in fishing activities, in addition to the fact that many fishermen moved for other alternative works. We hope that with the end of the crisis in Syria, more new vessels will be operated and conducted to fishing activities.
- We confirm that all information and data collected by the national observer program will be reported to the ICCAT Secretariat every year.
- There is lack of financial support for experts and researchers regarding marine fisheries research, and also no cooperative programs or any technical assistance from any international organization or agencies since 2011. We are unable to attend meetings regularly in person (due to sanctions against Syrian banks and difficulties obtaining visas as a result of applying from neighboring countries) or online (unable to access Zoom services due to sanctions).
- General Commission for Fisheries Resources as fisheries authority in Syria doing all available means to improve fisheries management and statistical data collection under the difficult conditions in Syria, it encourage fishermen to develop their fishing gear and extend fishing activities to EEZ to meet the high demand for marine products due to overexploitation of coastal fisheries resources.

Please accept the assurances of my highest consideration.

Compliance letter response template

2023 Commission Meeting			
CPC: SYRIA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	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. 16-14: No ST-09 received.	According to Rec. 16-14 Para 4 b, and due to the fact that majority of fishing vessels belong to the artisanal sector the national observer program for sampling from the fleet was implemented by distributing observers in all landing centers on Syrian coast to monitor and record catch of all landed boats. The data collected through this program have been used to quantify the composition, disposition, and quantity of the total catch of fisheries in Syria.	We confirm that all information and data collected by national observer program will be reported to the ICCAT Secretariat every year.
<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	Date sent:	Template completed?	Explanation received?
Response to COC Chair letter from previous year?	No reply to COC Chair letter following 2022 meeting.	According to Rec. 16-14 Para 4 b and due to the fact that the majority of the fishing vessels belong to the artisanal sector the national observer program for	

		sampling from the fleet was implemented by distributing observers in all landing centers on Syrian coast to monitor and record catch of all landed boats. The data collected through this program have been used to quantify the composition, disposition, and quantity of the total catch of fisheries in Syria.	
MITIGATING CIRCUMSTANCES	<i>Request made to:</i>	<i>Date request sent:</i>	<i>Request approved/rejected</i>
Request for Capacity Building (indicate fund/type)			



Government of the Republic of Trinidad and Tobago
Ministry of Agriculture, Land and Fisheries

11 October 2024

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 13 September 2023 which seeks a reply from Trinidad and Tobago on the following reporting and implementation deficiencies noted by the Commission during its 28th Special Meeting held 13-20 November 2023:

- Rec. 18-07: Annual Report received late
- Rec. 16-14: No ST-09 received
- Rec. 16-14: Additional information needed regarding progress on implementation of scientific observer programme

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

Trinidad and Tobago recognizes the critical importance of implementing a scientific observer programme for its non-artisanal longline fleet in particular and in this regard is participating in the 4-year GEF regional project: *Strategies, technologies and incentives to manage bycatch in tropical Large Marine Ecosystem Fisheries (REBYC-III CLME+)*, for which the inception meeting was held in January 2024. The project addresses the management of bycatch and discards in selected fisheries. Activities will be aligned with components relating to: 1. improving fishing practices to manage bycatch and reduce discards; 2. strengthening governance and management frameworks and enforcement measures to better manage bycatch and reduce discards; 3. encouraging behaviour change for adoption of effective bycatch mitigation, discard reduction and ALDFG management measures; and 4. knowledge management and lesson learning. The participating countries are currently in the process of elaborating their work plans. The selected Trinidad and Tobago fisheries are the non-artisanal longline fishery and gillnet component of the artisanal multi-gear fishery. Pilot observer and electronic monitoring system programmes for the non-artisanal longline fleet will be implemented under the project.

With regard to progress on the enabling legislation for implementation of the observer programme the following ensued. Stakeholder groups provided extensive comments on the Fisheries Management Bill to the

Fisheries Division

#35 Cipriani Blvd, Newtown, Port of Spain, Trinidad and Tobago, West Indies.
Phone: 623-5989, 623-8525 | Fax: 623-8542 | Website: agriculture.gov.tt

Joint Select Committee of Parliament between December 2020 and March 2021, which were incorporated into the Bill. The resulting amended Fisheries Management Bill was the subject of public consultations between 5 and 15 November 2023. Following the stakeholder consultations in November 2023 the Fisheries Division is engaged in the review of extensive comments, the last of which are expected to be submitted by a key stakeholder before the end of 2024. Following review of the comments, any required drafting/re-drafting will be undertaken by the office of the Chief Parliamentary Counsel. The Bill will then be submitted to the Legislation Review Committee of the Cabinet.

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



Elizabeth Mohammed
Director of Fisheries (Ag)
TRINIDAD AND TOBAGO Head Delegate

DIRECTOR OF FISHERIES

cc: Mr. Penas Lado, Commission Chair

Fisheries Division

#35 Cipriani Blvd, Newtown, Port of Spain, Trinidad and Tobago, West Indies.
Phone: 623-5989, 623-8525 | Fax: 623-8542 | Website: agriculture.gov.tt

Compliance letter response template

2023 Commission Meeting			
CPC: TRINIDAD AND TOBAGO			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	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>	Rec. 18-07: Annual Report received late.	Concerted effort was made to submit the Annual Report on time in 2024. The Report was fully submitted 7 days past the deadline on 22 September 2024.	11 November 2023.
<i>Statistical Data</i>	Rec. 16-14: No ST-09 received.	Trinidad and Tobago is participating in the 4-year GEF regional project: Strategies, technologies and incentives to manage bycatch in tropical Large Marine Ecosystem Fisheries (REBYC-III CLME+), for which the inception meeting was held in January 2024. Trinidad and Tobago will implement pilot observer and electronic monitoring system programmes for the non-artisanal longline fleet under the project.	
<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: Additional information needed regarding progress on implementation of scientific observer programme.	Consequent to the submission of extensive comments from stakeholder groups to the Joint Select Committee of Parliament, between December 2020 and March 2021, the resulting amended Fisheries Management Bill was the subject of public consultations between 5 and 15 November 2023. Following the stakeholder consultations in November 2023 the Fisheries Division is engaged in the review of extensive	

		comments, the last of which are expected to be submitted by a key stakeholder before the end of 2024. Following review of the comments, any required drafting/re-drafting will be undertaken by the office of the Chief Parliamentary Counsel. The Bill will then be submitted to the Legislation Review Committee of the Cabinet.	
<i>Vessel Controls</i>			
OTHER	<i>Date sent:</i>	<i>Template completed?</i>	<i>Explanation received?</i>
Response to COC Chair letter from previous year?			
MITIGATING CIRCUMSTANCES	<i>Request made to:</i>	<i>Date request sent:</i>	<i>Request approved/rejected</i>
Request for Capacity Building (indicate fund/type)			

Bolivarian Republic of Venezuela
Ministry of People's Power for Fisheries and Aquaculture
DGDE-24-No.: 0233
Caracas, 25 September 2024

DEREK CAMPBELL

Chair

Compliance Committee

International Commission for the Conservation of Atlantic Tunas (ICCAT)

I have the honour to address you and would like to extend warm greetings to you on behalf of all the staff working in this Ministry, and to the work team that accompanies you in your management.

I would like to draw your attention to the communication **S24-09335 of 13 September 2024** concerning the reporting and implementation deficiencies of the Bolivarian Republic of Venezuela in relation to ICCAT requirements:

In this regard, we inform very respectfully of the following:

- 1. Rec. 11-11: Difference between Task 1 and BET Compliance Tables:** The BET catches reported in CP13 VEN 2023 correspond to the total catches of all fleets (LL, BB and PS). For the LL fleet, the BET catches in 2023 were 2.77 t.
- 2. Rec. 21-04: Continued overharvest of ALB-N:** During the 2023 the strategic plan to reduce the ALB-N overharvest continued. The results presented in CP13 VEN 2023 show that the Bolivarian Republic of Venezuela has a positive balance for this species. It should be noted that CP13 was submitted on 14 August 2024.
- 3. Rec. 19-05: Continued overharvest of WHM:** The Bolivarian Republic of Venezuela is developing an action plan to regulate and reduce the overharvest of the WHM species. This includes compliance with discards as from September 2018 and some internal measures to limit trade of this species once the established WHM quota has been reached. The Venezuelan tuna fleet has been officially notified of these measures.
- 4. Rec. 22-17: Incomplete Annual Report, some IOMS sections are missing:** The Bolivarian Republic of Venezuela has not been able to complete some sections of the report, due to difficulties in the development of actions related to updates of internal plans and legislation. However, we are making an effort to improve the timely transmission of information in order to overcome the difficulties we have had so far, with a view to complying with ICCAT Recommendations.
- 5. Rec. 21-01 and Rec. 22-01: Tropical tunas fishing plan received late:** The Bolivarian Republic of Venezuela submitted the CP48 VEN 2024 format on 31 January 2024. Even so, the fisheries administration is making efforts to improve timely submission of information, with the aim of resolving the difficulties that have arisen to date.
- 6. Rec. 16-14: Additional information is needed on implementation of the scientific observer programme and data reporting:** The Bolivarian Republic of Venezuela is working on the development of a new onboard observer programme which it is estimated will become effective in late 2024. The Venezuelan fisheries administration will implement the reactivation of the aforementioned programme through a strategic alliance between the Fundación para la Pesca Sostenida y Responsable de Túnidos (FUNDATUN) and the Ministry of People's Power for Fisheries and Aquaculture.

It should be noted that the Bolivarian Republic of Venezuela and the authorities within this fisheries administration have taken on with great responsibility the implementation of management measures aimed at regulating fishing activities, as well as the country's reports and compliance with the Commission.

I thank you in advance for your attention to this letter, and I remain at your service at the Ministry of the People's Power for Fisheries and Aquaculture.

(signed and sealed)

Pedro Emilio Guerra Castellano

General Director of the Office

Ministry of People's Power for Fisheries and Aquaculture

Compliance letter response template

2023 Commission Meeting			
CPC: GHANA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
CATEGORY A			
<i>Compliance Tables</i>	Rec. 11-11 : Difference between Task 1 and the Compliance tables for BET.	The BET catches reported in CP13 VEN 2023 correspond to the total catches of all the fleets (LL, BB and PS). The BET catches for the LL fleet in 2023 were 2.77 t.	Format CP13 EN 2023 was submitted on 14/08/2024. Tasks 1 and 2 were submitted on 15/07/2024.
<i>Capacity, size, gear, time, area restrictions</i>	Rec. 21-04 : Continued overharvest of ALB-N.	The strategic plan to reduce overharvest of ALB-N continued in 2023. The results submitted in the format CP13 VEN 2023 show that Venezuela has a positive balance for this species.	The format CP13 EN 2023 was submitted on 14/08/2024.
	Rec. 19-05 : Continued overharvest of WHM.	An action plan to regulate and reduce the overharvest of the WHM species is being developed. This includes compliance with discards and some internal measures to limit trade of this species once the WHM quota limit has been reached.	
CATEGORY B			
<i>Annual Report</i>	Rec. 22-17 : Incomplete Annual Report, some IOMS sections are missing.	It has not been possible to complete some sections of the report as Venezuela has encountered difficulties in the development of some actions related to updating of action plans and pieces of domestic legislation, which have been delayed, due to administrative issues. However, work is being undertaken on improvements to enable compliance with ICCAT Recs.	
<i>Statistical Data</i>			
<i>Other reports</i>	Rec. 21-01 y Rec. 22-01 : Tropical tunas fishing plan received late.	The format CP48 VEN 2024 was submitted on 31/01/2024.	The format CP48 VEN 2024 was submitted on 31/01/2024.
	Rec. 18-06 : Update of shark check sheet not received.	Work is being done on this requirement which will soon be submitted.	It was submitted on 19/09/2024.

CATEGORY C			
<i>MCS-species related</i>	Rec. 16-14: Additional information is needed on implementation of the scientific observers programme and data reporting.	Venezuela is working on development of a new onboard observer programme which it is estimated will become effective in late 2024.	
<i>MCS-general: Port Controls</i>			
<i>Vessel Controls</i>			
OTHER	<i>Date sent:</i>	<i>Template completed?</i>	<i>Explanation received?</i>
Response to COC Chair letter from previous year?	Response to the COC Chair letter received late (6 November).		
MITIGATING CIRCUMSTANCES	<i>Request made to:</i>	<i>Date request sent:</i>	<i>Request approved/rejected</i>
Request for Capacity Building (indicate fund/type)			

MINISTRY OF DEFENCE

DGIMFLMM - UBPM N° 051/2024
Subject: Response to Note S24-09326
Annexes: Four (04)
La Paz, 18 September 2024

Mr Derek Campbell
Compliance Committee (CoC) Chair
International Commission for the Conservation of Atlantic Tunas (ICCAT)
C/ Corazón de María 8, 28002, Madrid
Spain

Dear Chair,

I am writing in response to your Note S24-09326 of 13 September 2024, in which you informed the official delegation of the Plurinational State of Bolivia to ICCAT that “several reporting and implementation deficiencies” were noted during the 28th Regular Meeting of the Commission held in New Cairo, the Arab Republic of Egypt, and in hybrid format, from Monday 13 to Monday 20 November 2023.

Accordingly and for compliance purposes, I hereby submit Bolivia’s responses to the compliance letter referred to above, in a separate file, using the template in *.doc format provided for this purpose, and in blue font. That said, I would like to address those deficiencies below:

“Some parts of the Annual Report received late.”

There certainly was a delay in submitting the part of the Annual Report that had to be submitted in Word and is not covered by the Integrated Online Management System (IOMS) platform. This was due to a *bona fide* misinterpretation by the external international consultancy firm that was assisting the Bolivian delegation in these matters. The interpretation was eventually clarified through support from Secretariat staff, which enabled the missing information to be submitted by email on 1 October 2023. A copy of the submission message is attached, with file name “Anexo Alpha”.

“Reply to CoC letter received late.”

The relevant explanations for the delay were provided through Official Communication DGIMFLMM - UBPM No. 078/2023, dated 9 October 2023 and signed by the former General Director, Captain Julio César Fuentes Cossío, in response to your Note S23-07902 of 27 June 2023. A copy of the Official Communication is attached, with file name “Anexo Bravo”. It was submitted via email on 10 October of that year, accompanied by the response to the 2022 compliance letter, in Word. A copy of the message for the submission is attached, with file name “Anexo Charlie”. The Official Communication indicates that it was not possible to provide a response to your compliance letter by the established deadline i.e. 1 October 2023, due to “the occurrence of some specific administrative and communication issues with the staff of the external consultancy firm in charge of handling these compliance matters and the relationship with ICCAT”. This delegation was surprised by the statement that this response “was received late (30 October)”, when it had been submitted 20 days earlier, as evidenced by the email exchange between the international consultant and the Commission staff, a copy of which is attached with file name “Anexo Delta”. It contains the acknowledgement of receipt of the Official Communication on that 10 October and the Word document requested by the staff was received on 11 of the same month and year.

As a Cooperating Non-Contracting Party to ICCAT, Bolivia has participated in its work since 2013 with longstanding, legitimate and significant interest and remains firmly committed to compliance with the obligations inherent to that status. Bolivia therefore regrets these circumstantial delays noted in 2023 which may have undermined the efforts of the Contracting Parties in exercising due control over CPCs and may have affected the adoption of the necessary conservation and management measures based on the best scientific evidence available. Bolivia never intended to avoid those control or elude any significant oversight, nor to compromise ICCAT’s performance with respect to the measures to be adopted on the fisheries within its remit.

As usual, Chair, Bolivia appreciates your openness in assessment of its compliance, as well as your customary availability, providing useful feedback orally for continuous improvement of this delegation in compliance with the obligations of the Commission. Similarly, Bolivia acknowledges the continuous support of the Executive Secretary and the members of the Compliance Department of the Commission.

At this point in 2024, Bolivia hopes that it has been able to comply with all its reporting obligations in time and form.

Please accept, ICCAT Compliance Committee Chair, the assurances of my highest consideration.

(signed and sealed)

Capitan of frigate DEMN Limbert Ismael Cortez Franco
Chief of Bolivian Maritime Fisheries Unit

Annexes: Four (04)

Completed response form, in Word.

Anexo Alfa: Email submission Annual Report missing.

Anexo Bravo: Official Communication DGIMFLMM - UBPM No. 078/2023 of 9 October 2023.

Anexo Charlie: Email submission response to CoC Chair.

Anexo Delta: Emails containing acknowledgment of receipt of response to the CoC Chair letter.

CC: Mr Ernesto Penas, Chair, ICCAT
Mr Camille Manel, Executive Secretary, ICCAT
BA/MA Hugo Alsina, International Consultant, UBPM
Archive

Compliance letter response template

2023 Commission Meeting			
CPC: BOLIVIA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN SINCE 2022 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>	Some parts of the Annual Report received late.	The missing part of the Annual Report was submitted in the manner recommended by the Secretariat.	10 October 2023, via email.
<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	Date sent:	Template completed?	Explanation received?
Response to COC Chair letter from previous year?	Reply to CoC letter received late	Yes.	Yes, through Official Communication DGIMFLMM - UBPM No. 078/2023 of 9 October 2023, submitted by email on 10 October, indicating the occurrence of "specific administrative and reporting issues with staff of the external consultancy firm in charge of handling these compliance matters and the relationship with ICCAT".
MITIGATING CIRCUMSTANCES	Request made to:	Date request sent:	Request approved/rejected
Request for Capacity Building (indicate fund/type)			

Compliance letter response template

2023 Commission Meeting			
CPC: GUYANA			
AREA OF DEFICIENCY	SPECIFIC ELEMENT	REMEDIAL ACTION TAKEN	DATE MISSING DATA/INFORMATION SENT (if applicable)
CATEGORY A			
<i>Compliance Tables</i>	Rec. 18-05: Despite report of zero catch of WHM there is indication that exports (and hence catches) have taken place in 2022.	There have been no observed cases of white marlin exports from Guyana. Further, no Guyana-flagged vessels has harvested any species under the conservation measures of ICCAT since the closure of the fisheries responsible for these catches.	
<i>Catch, capacity, size, gear, time, area restrictions</i>	Rec. 19-05: Possible overharvest of WHM, as Guyana has a negative balance on Compliance Table yet trade data indicate exports, which suggests fishing.	The EU made inquiries regarding blue marlin (<i>Makaira nigricans</i>) that were exported; however, these blue marlin (<i>Makaira nigricans</i>) were part of the stock harvested prior to the implementation of the suspension of the responsible fishery in 2021. This was dealt in another correspondence to ICCAT responding to the EU.	
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	<i>Date sent:</i>	<i>Template completed?</i>	<i>Explanation received?</i>
Response to COC Chair letter from previous year?		No	
MITIGATING CIRCUMSTANCES	<i>Request made to:</i>	<i>Date request sent:</i>	<i>Request approved/rejected</i>
Request for Capacity Building (indicate fund/type)			