



Dr Christopher O'Brien
Executive Secretary
IOTC Secretariat
Le Chantier Mall (2nd floor)
PO Box 1011
Victoria Mahé – SEYCHELLES

August 3rd 2020

Dear Dr O'Brien

I am writing on behalf of the partners of the [Global Tuna Alliance](#) and [Tuna Protection Alliance](#), two precompetitive collaborations of companies with a major interest in improving the sustainability of the tuna sector. Together, these two groups represent a significant proportion of the north west European market.

I would be extremely grateful if you are able to circulate to all IOTC members.

It is clear that the impacts of COVID-19 have presented challenges to regional fisheries management organizations (RFMOs) in conducting meetings and addressing important conservation and management issues in 2020. We do not believe current circumstances should prevent the IOTC from taking action to ensure the uninterrupted sustainable management of the tuna stocks and marine ecosystems under its purview. We do recognize that the Commission may need to hone the focus of its work in 2020 for practical reasons due to present circumstances. In particular, there are several critical measures and issues that require immediate attention by IOTC this year.

Yellowfin Tuna

We strongly urge members to press the IOTC to include on its Commission meeting agenda the **adoption of an effective rebuilding plan for yellowfin tuna** that fully implements 2015 Scientific Committee advice and replaces the interim measure in Resolution 19/01.

Based on data provided in the IOTC Scientific Committee, and subsequently substantiated in an independently produced [report](#) commissioned by the GTA, a catch reduction of 25 percent relative to the catch in the year 2017 is necessary for recovering the stock in two generations.

We see this issue as critical to address this year for two reasons:

- The current measure is interim and therefore must be renewed or revised this year.
- Although a rebuilding plan was adopted by the Commission in 2016 and revised and extended in 2019, the negotiated outcomes resulted in reductions in catch that are not significant enough to rebuild the stock to a sustainable level in the agreed timeframe.

Skipjack Harvest Control Rules

Members should ensure that the IOTC monitors & control catches of skipjack to ensure catches do not exceed the limit set by Resolution 16/02.

Reforming the Regulations of at-sea Transshipment

At-sea transshipment of catch between vessels plays a large and important role in the global commercial fishing industry.

There is not enough independent data, appropriately and timely shared, nor are other regulations up to date, to allow for effective monitoring and compliance. These gaps create risks for labour and human rights abuses, can reduce observer safety, and create opportunities for IUU fishing activities, fraud, and catch laundering. Insufficient monitoring can also undermine traceability, the provision of required data collection, and effective implementation of bycatch mitigation measures.

As well as adopting 100% observer coverage requirement (human and/or electronic) on all vessels engaged in at sea transshipment, by 2024, IOTC should adopt amendments to existing transshipment regulations to bring in line with [best practices](#).

Observer Coverage

In addition, we urge all members to ensure that short-term measures to suspend some observer coverage requirements are reinstated as soon as practical. Further, we believe current circumstances reinforce the need for accelerating the development and implementation of electronic monitoring tools and strategies to strengthen critical oversight in tuna fisheries. Specifically, the IOTC should update Resolution 16/04 to ensure that the Scientific Committee develops electronic monitoring standards and presents them to the Commission in 2021.

As organizations engaged in the sourcing of tunas globally, we urge you to ensure the inclusion of these issues on IOTC meeting agendas in 2020 and that your positions will testify to your support for addressing these issues.

Thank you for your attention in this matter.

Yours Sincerely,



Dr Tom Pickerell
Executive Director
Global Tuna Alliance



Jeanne Delor
Project Officer
Earthworm Foundation

