



**agriculture,
forestry & fisheries**

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Agriculture, Forestry and Fisheries
REPUBLIC OF SOUTH AFRICA

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Ms Kim Jung-Re
ACTING CHAIRPERSON
INDIAN OCEAN TUNA COMMISSION (IOTC) SECRETARIAT
2nd Floor, Le Chantier Mall
PO Box 1011
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SEYCHELLES

Dear Ms Kim Jung-Re

RE: RESPONSE TO COMPLIANCE ISSUES

Your letter dated 25 May 2018 (IOTC Reference: 6952), hereby refers.

1. *Has not reported Size frequency for the coastal fisheries, as required by Resolution 15/02.*

The coastal fishery of South Africa (Tuna Pole-Line sector) predominantly operates in South Africa's ICCAT area of competence. Of the over 2000 tons of national total TPL catch in 2017, only 2.57 tons were taken in the IOTC area. This equates to 0.3% of the total Tuna Pole-line catch and less than 0.5% of the total effort. Recalling that the TPL sector is not permitted to catch and land any pelagic shark species or swordfish according to permit conditions, no data is available for these species.

2. *Has not reported Size frequency for the longline fisheries, as required by Resolution 15/02.*

The majority of longline effort in South African waters of the IOTC area of competence is derived from 'Chartered' agreements with Japanese vessels. These vessels are mandated to have 100% observer coverage and South Africa collects size-frequency data from this observer programme. Given the 'Chartered' agreement is between the vessel owner and a South African fishing rights holder, and that the vessel must abide by South African legislation, South Africa was of the understanding that the observer data derived from the "Chartered" vessels fishing in South African waters would accrue to South Africa. After much discussion with the IOTC Secretariat at the 20th Meeting of the Scientific Committee, the IOTC Secretariat, nevertheless, decided this was not the case – these data were accrued to Japan, noting the inconsistencies relating to apportionment of the data by the IOTC Secretariat. As such, South Africa could no longer satisfy the length-frequency data requirements stipulated by the IOTC despite having collected, and submitted to the IOTC Secretariat, ample size-frequency data. In response to this, and to avoid repeated compliance issues regarding observer data, South Africa drafted and tabled a proposal, "*On Vessel Chartering in the IOTC Area of Competence*" during the IOTC's 22nd Session Commission, held in Bangkok, Thailand in May 2018. The proposal was adopted by the Commission.

3. *Has not reported Size frequency on sharks to IOTC standard, as required by Resolution 17/05.*

Please see response to statement 2, above, which is applicable here.

4. *Non-repeated compliance issues.*

I believe this to be a sub-title under which compliance issues fall. We request the Secretariat to differentiate this line as such, so as to not give an

exaggerated impression of the number of compliance issue South Africa is deemed to have had in 2017.

5. *Has provided the list of active vessels in 2017 including foreign vessels, as required by Resolution 10/08.*

This is a statement of full compliance on South Africa's behalf, as opposed to a compliance issue. We request the Secretariat to remove this statement from the *Compliance Issue* table.

6. *Has not fully implemented the requirement of the Fleet Development Plan (FDP terminated in 2015), as required by Resolution 15/11.*

South Africa is currently in the process of updating the FDP.

7. *Has not reported Nominal catch on sharks to IOTC standard, as required by Resolution 17/05.*

South Africa respectfully requests the IOTC Secretariat to provide clarification on this point. South African nominal shark catch data was submitted to the Secretariat on 30.06.2017 and, to our best knowledge, satisfies the obligatory criteria stipulated in Resolution 17/05.

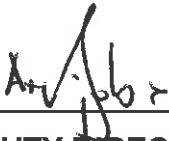
8. *Has not reported Catch and Effort on sharks to IOTC standard, as required by Resolution 17/05.*

South Africa respectfully requests the IOTC Secretariat to provide clarification on this point. South African shark catch and effort data was submitted to the Secretariat on 30.06.2017, and to our best knowledge, satisfies the obligatory criteria stipulated in Resolution 17/05.

9. Has not fully implemented the requirement on 5% Mandatory, at sea (All Vessels), as required by Resolution 11/04.

Please see response to statement 2, above, which is applicable here.

Yours sincerely,



DEPUTY DIRECTOR-GENERAL: FISHERIES MANAGEMENT

Letter signed by: Mr. Asanda Njobeni

Designation: Chief Director: Marine Resources Management (acting)

Date: 22 June 2018