



LDAC ADVICE ON ICCAT ANNUAL MEETING 2025 **(Sevilla, 17-24 November 2025)**

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R-05-Ej.19 (2025-2026)/WG1

Recommendations on Horizontal topics

(not addressed in the joint LDAC-MEDAC-CCRUP-CCS advice)

Fight against Illegal, Unregulated and Unreported (IUU) Fishing

In order to fight IUU fishing, the LDAC recommends the European Union to:

- Establishing a proper vessels registry, indicating which vessels do fish or not in the ICCAT area of competence. Reporting under form ST-01 is designed to allow such a listing by the Secretariat, but it is not correctly implemented. Assessing levels of fishing activity is then not possible. The European Union should urge CPCs to respect this obligation. The European Union should also insist that the ICCAT Secretariat collects and establishes the active vessel registry in order to undertake the planned estimation of the number of active vessels in ICCAT's area of competence.
- Encouraging CPCs to actively participate in the Catch Documentation Scheme Working Group (CDS WG) and expand electronic Catch Documentation to all ICCAT stocks and species on the basis of an ambitious time frame, beginning with bigeye tuna (*Thunnus obesus*), swordfish (*Xiphias gladius*) and, possibly, yellowfin tuna (*Thunnus albacares*). This should be done in coordination with the revised European Fisheries Control Regulation, and the introduction of CATCH IT, to avoid a cumbersome system penalising the EU fleets^[1].

Code of conduct of members of the EU delegation

In 2024, the European Commission edited a code of conduct for members of the European delegation. We note that this has traduced in a lower information of stakeholders during the meeting. We also note that the restrictions imposed to stakeholders who are members of the EU delegation prevent promoting EU values among other CPCs. We therefore transmit our disappointment towards this code of conduct.



ICCAT Panel 1 – Tropical tuna fisheries

LDAC recommendations on a multi-annual management plan for tropical tunas (PA1)

The LDAC is concerned by the insufficient monitoring of purse seiners from Senegal and Ghana, which have reported incomplete statistical data to ICCAT.

The LDAC recommends allocating the quota for yellowfin tuna as soon as possible, as well as improving and effectively implement compliance schemes within the ICCAT.

Yellowfin tuna (YFT) allocation

The LDAC notes that a full stock assessment was conducted for yellowfin tuna in 2024, resulting in the SCRS declaring the stock being not overfished nor subject to overfishing with a 58% probability.

However, as Rec. 11-01 established a TAC of 110,000 t but did not establish limits by CPC, the SCRS in his 2024 meeting expressed concern that the TAC has been exceeded for five years and that maintaining the current level of catch of 140 000 t. average might result in overfishing; the SCRS also advised *“to establish a mechanism to ensure that the catches of yellowfin tuna do not exceed any adopted TAC”*¹:

The LDAC is also worried that the recent dramatic increase of the tropical tuna catches from the Asian owned purse seine fleet flagged in Ghana despite established the established quota of bigeye, as well as increased catches from the Brazilian “vessel associated-school” handline fishery operating in the western Atlantic from 1,600 t in 2012 to over 14,000 t in 2023 are extremely worrying.

From 2016 to 2023, Senegal and Ghana’s purse seine fleets have doubled their catches of yellowfin tuna² while maintaining the bigeye catches (while bigeye is a stable and quite proportional bycatch of skipjack for purse seine gears).

The LDAC then recommends that the European Union proposes an allocation for Yellowfin tuna in 2025, taking advantage of the stock being in the green.

¹ https://www.iccat.int/Documents/BienRep/REP_EN_24-25-I-2.pdf : “The Committee reiterated concern that current catch levels, averaging nearly 140,000 t over the last 5 years, are expected to result in overfishing and lead to an overfished status if they continue. Furthermore, given that the TAC has been exceeded continuously by substantial amounts, existing conservation and management measures appear to be insufficient to limit harvest. The Committee recommends that the Commission establish a mechanism to ensure that the catches of YFT do not exceed any adopted TAC.”

² According to ICCAT’s data discussed at the bigeye stock assessment meeting in July 2025.

The LDAC also recommends that in order to maintain its tropical tuna fleet activity in the Atlantic Ocean, the European Commission negotiates for a system of allocation that ensures level playing field between EU and non-EU vessels and preserves the European fishing possibilities in the Atlantic.

Bigeye tuna

The LDAC notes the results of the bigeye tuna (BET) stock evaluation meeting that took place from July 14th to 17th in Madrid, which determined that the stock is not overfished nor subject to overfishing with a high probability (74%). The new stock status is mostly supported by the low catches of bigeye tuna reported in recent years, and a less uncertain stock assessment, driven by more reliable estimates of a joint-longline index of abundance from Asian fleets and estimates of natural Mortality for the stock. They result in the current TAC (73011 tons) likely to maintain the stock in the green quadrant of the Kobe Plot with a 91% probability, meaning that the Commission could consider increasing the TAC and/or reducing other measures, such as the FAD Closure, without compromising stock status in the future.

To ensure that the global TAC is respected while having regards for the developing countries' right to fish, **the LDAC recommends that the European Union requires efficient monitoring as well as prior information to ICCAT of fishing management plan for low-income CPCs that are planning to develop their fisheries in order to anticipate needs for quota transfers.**

On the specific question of monitoring, ICCAT currently requires contracting parties, depending on their bigeye total catch levels, to report either by quarter, month or week, in order to ensure timely monitoring of the compliance with their individual bigeye catch limits. However, these reports are not correctly done. **The LDAC then recommends the EU insist on implementing correctly this obligation.**

The LDAC also recommends that EFCA includes ICCAT in its control plan for regions outside the European Union. Even without HSBI, it is still possible to sight the activity, including checking on potential non-authorized vessels and FAD fishing during the moratorium.

Skipjack tuna (SKJ) management procedure

The LDAC acknowledges the advice of the SCRS and envisages that, following a multi-stock approach, an MSE for the three tropical tuna species should be carried out. Once this MSE is completed, ICCAT should develop a multi-specie harvest strategy for all tropical tuna stocks. The LDAC also recommends to review bigeye and yellowfin tuna allocation taking into account this new multi-specie harvest strategy and trade-offs.

In the interim, while acknowledging the MSE work completed on Western Atlantic Skipjack Tuna stock (WSKJ), **the LDAC recommends that the Commission works closely with other CPCs to adopt a WSKJ management procedure at this year's annual meeting.**

FAD closure

The LDAC reminds that the SCRS in its 2024 report indicated that *“it is currently difficult to discern any reduction in the aggregate impact of these fisheries on yellowfin or bigeye tuna spawning biomass as a result of the full closure. This is not unexpected because it takes time for reductions in juvenile mortality to have positive effects on spawning biomass”*³.

The LDAC also reminds that, recognizing both the SCRS advice indicating that for bigeye tuna, the main driver of the stock status is the quota, not any moratorium, and also recognizing that the ICCAT FAD moratorium was deeply lacking compliance from non-EU fleets, namely vessels from Ghana and Senegal, it was decided during ICCAT’s 24th extraordinary meeting to decrease the moratorium from 72 to 45 days.

The LDAC reminds that the socio-economic impact of the FAD moratorium on the EU fleet has been very severe since 2020. Four EU purse seine vessels have already ceased their activity and globally, the EU vessels’ number, catches and productivity have been decreasing because of the moratorium. According to STECF 2024 Annual Economic Report, the 72 days closure for FADs (Fish Aggregating devices) from 1 January to 31 March in the Atlantic Ocean is one of the main drivers and limiting factors affecting EU fleet performance in the ICCAT RA⁴, as it has a negative impact in terms of fleet activity and level of catch of French and Spanish purse seine active vessels in ICCAT RA.

The LDAC is also worried that tuna dependent economies among coastal states also suffered severe consequences: several canneries have closed in Cabo Verde and Côte d’Ivoire, not receiving enough and regular supply from European fleets.

They also receive less financial contribution from EU shipowners, that were not able to fully utilize SFPAs fishing possibilities; in June 2025, Gabon announced its decision to unilaterally terminate the Sustainable Fisheries Partnership Agreement (SFPA) signed with the European Union in 2007.

Finally, the main challenge for the FAD closure to be effective and achieve its aim of a sustainable use of marine resources is directly linked to the importance of further strengthening an effective and verifiable level playing field. If non-EU flagged fleets do not comply with the rules, then sustainability in the tuna fisheries will not be either environmentally sustainable, economically viable, or socially equitable. Thus, checks and balances within ICCAT constituent bodies coupled with effective monitoring, compliance and sanctioning mechanisms within the already existing international framework must be reinforced.

³ https://www.iccat.int/Documents/BienRep/REP_EN_24-25-I-2.pdf point 19.38

⁴ STECF AER 2024 : https://stecf.ec.europa.eu/data-dissemination/aer_en – See pages 72 and 232-3



The distortive effects of an uneven level playing field has already negatively affected the EU tuna fishing sector whose competitiveness has been undermined by other players not subject to or sharing equivalent high environmental, social or labour standards.

The LDAC notes warns that, since last year, compliance from Asian fleets has not improved.

In view of the above, including last year's scientific advice, in view also of the good status of the bigeye tuna, and noting that the LDAC is recommending an allocation for yellowfin tuna, the LDAC recommends that the EU request a full deletion of the FAD closure⁵.

The LDAC recommends that the EU bring cases of IUU from Senegalese vessels during the FAD closure to the compliance committee, including requesting listing the vessel as IUU. The LDAC also recommends that the EU considers giving a red card to Senegal.

Given the fact that the measurable socio-economic impacts of the FAD closure and other management measures has not yet been assessed, **the LDAC would like to see the EU proposing the creation of a Working Party on socioeconomics in ICCAT, similarly to those in other tuna RFMOs**, which would have the objective of assessing the impacts on the economic and social dimensions of sustainable management of fisheries under the ICCAT mandate.

⁵ The NGO members of the LDAC Seas at Risk, The Pew Charitable Trusts, Oceana, WWF and Environmental Justice Foundation remain cautious about fully deleting the FAD closure at this stage due to ongoing work to provide clearer management advice, including the Poseidon model for FAD regulation scenarios, integration of socio-economic assessments, understanding of juvenile stock impacts, and the upcoming SCRS meeting in September. The MSE-tested management procedure is also slated for adoption in 2026, and removing the FAD closure entirely before these steps would be premature.

ICCAT Panel 4 – Sharks and other species

Fins Naturally Attached Policy

- The EU has been a pioneer in ensuring full utilization of sharks through the adoption of its [Regulation \(EU\) No 605/2013](#) (so-called “Shark Finning Regulation”).
- At past ICCAT meetings and for 16 years, the EU has sponsored **proposals to implement a ban** on the removal of shark fins at sea (replacing Recommendation 2004/10), requiring that all sharks be landed with their fins naturally attached. Unfortunately, these proposals so far have repeatedly failed due to the opposition from Japan and China, including in 2024 despite an unprecedented support from most CPCs. Belize had also suggested to bring this topic to a vote, which was denied at plenary. Only EU vessels are applying such a ban.
- The LDAC also reminds that IOTC has made progress in 2025, adopting [Resolution 25-08 on the conservation of sharks caught in association with fisheries managed by IOTC](#), which strengthens the fins naturally attached policy in the Indian Ocean for sharks landed frozen while all shark landed fresh must comply with fins naturally attached without exceptions. From 2026 to 2028, only limited alternatives to the fins naturally attached policy are allowed for shark landed frozen, such as binding fins to carcasses or using matching tags. These transitional options require strict monitoring.

While the initial proposal intended to phasing out transitional options after 2028, the adopted one expires in 2028, requiring a review of all options, including fins naturally attached.

In view of the above considerations, the LDAC recommends the EU to resubmit their previous proposal and be ready to counter any proposal from Japan that would probably be closer to IATTC and WCPFC existing resolutions than the one adopted at IOTC. The LDAC also recommends that the EU maintain contact with Belize and other CPCs, which at the 2024 meeting had shown their alignment with the EU proposal of Fins Naturally Attached for a joint approach at this year’s meeting.

- **The LDAC recommends that the Commission must insist on reaching a consensus and stress that ample time for negotiation and discussions has been provided for more than 16 years, and that Fins Naturally Attached is the most effective measure to prevent shark finning and reaching a sustainable fishery, controlling at the same time the whole market of the captures, with the aim to eliminate the IUU practices.**

- In case of alternatives to the Fins Naturally Attached proposed by Japan or other CPCs the LDAC requests the EU to only consider those without exceptions' position for sharks landed frozen and only if at least equivalent provisions are included as have been agreed at this year's IOTC Commission Meeting.
- Furthermore, the LDAC insists that any such alternative expires at the latest in 2028 with "Fins Naturally Attached without exceptions" automatically prevailing per default as the only acceptable measure thereafter also for frozen sharks unless each CPC has demonstrated with evidence the effectiveness of its chosen alternative to both the Compliance Committee and the SCRS on an annual basis They shall also provide proof of successful prosecutions of offenses against the selected alternative.
- If negotiations fail again, the LDAC urges the European Commission to clarify that the EU fleet has consistently supported the 'fins naturally attached' policy as a standard practice. It is crucial to ensure that no responsibility for the failure of negotiations is attributed to the EU fleet.
- **Finally, the LDAC stresses that if these proposed alternatives are valid and effective by the SCRS and go ahead, other CPCs could also make use of them, even the EU itself, allowing their ships to opt for Fins Naturally Attached or for the new accepted alternatives, in order to get a Level Playing Field.**

Basking sharks (*Cetorhinus maximus*) and great white sharks (*Carcharodon carcharias*)

Upon request by the 2024 ICCAT Commission, the SC-ECO reviewed the status of Basking Sharks and Great White sharks. In its report, the committee identified both species as having the highest level of biological vulnerability and recommended that precautionary management measures be adopted for their conservation.

Specifically, it advised considering measures similar to those applied to Mobulid Rays ([Rec. 23-14 BYC](#)⁶) and Whale Sharks ([Rec. 23-12 SHK](#)⁷). This recommendation is supported by the ICCAT Shark Working Group.

The LDAC therefore recommends that the EU supports and endorses a retention ban for Basking Sharks and Great White Sharks, as well as measures describing best handling and release procedures for both species in line with SC-ECO report⁸.

⁶ ICCAT Recommendation on Mobulid Rays (family mobulidae) caught in association with ICCAT fisheries

⁷ ICCAT Recommendation for the conservation of whale sharks (*Rhincodon typus*) in association with ICCAT fisheries

⁸ Meeting of Subcommittee on Ecosystems and Bycatch (SC-ECO) - Hybrid/Madrid, Spain, 12-16 May 2025
SC-ECO Report 2025: https://www.iccat.int/Documents/Meetings/Docs/2025/Reports/2025_SC-ECO_ENG.pdf

Atlantic Shortfin Mako - ASM (*Isurus oxyrinchus*)

- The LDAC notes that new stock assessments for both the North and South Atlantic SMA stocks, a highly vulnerable species (due to his slow growth, late maturity) originally scheduled for 2024, took place in 2025. The South Atlantic stock has been assessed to be overfished and experiencing overfishing in 2023 with a 50.5% probability; and a probability for being either overfished or experiencing overfishing are 16.0% and 16.4%, respectively; while the probability of the stock to be in the green quadrant (neither overfished nor subject to overfishing) is 17.1%.
- Projections from the assessment for management advice will however only be available in September 2025. For the North Atlantic the stock assessment will have to be completed in 2026 and no conclusions or new management advice beyond the measures already required by Rec 2021-09 can be expected prior to completion of the stock assessment.
- The LDAC therefore notes that [recommendation 21-09](#) establishes a total mortality limit of 250t for the North Atlantic to allow for at least a 60-70% probability of rebuilding the overfished stock by 2070. However, despite the retention ban in place since 2022, estimates point to an annual mortality rate exceeding 1.000 tons.
- The LDAC is worried that discard reporting of shortfin mako in South Atlantic has been complied only by EU vessels. The lack of data hampers accurate assessment of total mortality.

The LDAC recommends that EU requests the ICCAT Commission to require all fleets to review and implement existing effective measures including any additional measures in 2026 to reduce mortality in both parts of the Atlantic respecting measures outlined by Rec 21-09 and [Rec 22-11](#)⁹.

- **The LDAC also recommends that, once stock projections and SCRS advice from the Southern Atlantic stock assessment are available, the EU requires that the ICCAT Commission complies with Rec. 22-11 requirements and follows scientific advice for an adjusted TAC by aiming to rebuild this stock as quickly as possible based on the projections. Socioeconomics aspects should be considered. In doing so, permissible CPC allocations should be redefined as total mortality limits, and not just retention allowances. CPCs that fail to report discards should be excluded from any retention in the following year, consistent with provisions already applicable in the North Atlantic under Rec. 21-09.**

Report of the 2025 Shortfin Mako Shark Stock Assessment Meeting:
https://www.iccat.int/Documents/Meetings/Docs/2025/Reports/2025_SMA_SA_ENG.pdf

⁹ <https://iccat.int/Documents/Recs/compendiopdf-e/2022-11-e.pdf>

- The LDAC is worried that despite having a TAC for the Southern Atlantic stock of 1,295 t with 503 t allocated to the EU (Rec 22-11), the EU is in a competitive disadvantage as it is, de facto, unable to fish shortfin mako sharks. This species is listed under Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). This listing requires that any international commercial trade in Southern Atlantic shortfin mako be supported by a transparent, science based Non-Detriment Finding (NDF), per Resolution Conf. 16.7 and Article IV(3).
- The NDF shall assess whether the species is maintained through its full range at a level consistent with its ecological role, and shall account all sources of mortality, including dead discards and post-release mortality. The EU Scientific Review Group applies CITES provisions rigorously, and the EU currently prohibits the commercialisation of shortfin mako shark from the Southern stock. However, several other ICCAT CPCs conduct less rigorous assessments or have different conservation priorities, continuing to issue NDFs even in cases of overfishing and allowing their fleets to fish for shortfin mako sharks within the limits set by ICCAT but without demonstrating effective mortality reductions or robust compliance with CITES obligations and ICCAT reporting requirements.
- The LDAC notes that Namibia has exceeded its retention allowance of 256 t by more than a factor of two in 2023 but was not requested to repay its excess retention in the following year. NGOs suggest that the ICCAT Commission strictly enforces repayment in the following year if a CPC exceeds its retention allowance as defined in Rec 2022-11.
- The LDAC insists that, if 2024 compliance data are in the same line, the prohibition of dead discards by domestic legislation of certain CPCs should not be accepted as a justification for exceeding their retention allowance.

MSE for blue sharks

The LDAC urges the EU to promote the timely start of Management Strategy Evaluation (MSEs) for North and South Atlantic blue shark stocks, following the outcome of the feasibility study which demonstrated that the development of MSE-tested Management Procedures is feasible, cost-effective and consistent with ICCAT's existing MSE framework.

The EU should support reaching agreement within the ICCAT Commission Meeting on preliminary operational management objectives, as outlined in the MSE roadmap.

END