

UNION OF COMOROS
Unity-Solidarity-Development

Ministry of Agriculture, Fisheries and the Environment

Directorate-General for Fishery Resources

Report on Conservation and Management Measures, CMM 2018/1, SIOFA / ASPOI

Introduction

The Union of Comoros is a cooperating and non-contracting party of SIOFA since 2018. Following the census of its flotilla (Diego Star 2 and Diego Star 3) as IUU vessels of SIOFA, the Union of Comoros all means to remedy this situation. Both vessels have been removed from the SIOFA IUU list and the country has committed to register its fleet with the SIOFA Vessel Register.

To this end, the Union of Comoros presented an impact report on bottom fishing at the SC4 of SIOFA in Japan, in March 2019, and requested the registration of its flotilla. A Comorian delegation participated in the MoP6 held in Mauritius in July 2019 to finalize the registration process. However, the process is not yet complete, Comoros will need to submit a compliance report and a notification report of the provisions of CMM 2018/1, including its paragraph 19 (a) which recommends that the parties inform the Conference of the Parties of the measures it intends to take pursuant to paragraphs 9 (1) (a) (i), (ii), (iii), and (iv).

It is on this basis that the Union of Comoros intends to give details. As a reminder, the provisions of paragraphs 9 (1) (b) have been addressed in the impact report on bottom fishing already presented to SC4 in Japan.

Provision of paragraph 9 (1) (a), (i):

As a reminder, the Union of Comoros flotilla has not carried out fishing operations in the SIOFA area of competence since it was listed as IUU vessels in 2018. The years of activity in the area of the SIOFA, although these activities are illegal, are documented in the Comoros impact report on bottom fishing presented to SC4 in Japan.

In terms of fishing effort, these two mother ships collected fish from motorized boats that practice hand line fishing. The risk of impact is minimal.

It should also be noted that the Union of Comoros is in the process of revising its Fisheries Act. The text of revision is adopted in plenary session of June 25, 2019, in the National Assembly. However, it is not yet promulgated. However, the revised Fisheries Act, in its Article 7-1 (i), provides a new provision for controlling the fishing effort of its fleet. The same Fisheries Act in its Article 15-1 (b) also provides the possibility of adopting regulations

with regard to the transposition of international or regional fisheries conservation and management measures into its own national legal framework.

The Union of Comoros will take the necessary steps, once the Fisheries Act has been promulgated, to adopt texts to transpose the conservation and management measures of SIOFA into its own legal framework in order to ensure the effective implementation of the management measures of SIOFA.

For the specific case of our flotilla (Diego star 2 and Diego Star 3), the General Directorate of Fisheries of Comoros and Rodia Processing Plants Co.Ltd, which operates the two vessels, have concluded a collaboration protocol in which certain conservation provisions are highlighted, including the fishing ban in SIOFA's area of jurisdiction prior to the registration of vessels.

Provision of paragraph 9 (1) (a), (ii):

The provisions of this paragraph do not seem applicable when our fleet practices hand line fishing.

Provision of paragraph 9 (1) (a), (iii):

Fishing for both vessels was conducted for 2 years with 4,100 hours, hand line fishing. The impact is minimal.

The revised Fisheries Act provides in Article 7-1 (h) for the minimization of incidental catches, discards and catches made by lost or abandoned fishing gear. The same Fisheries Act as revised in Article 98-1 (j) provides for penalties for any abandonment of fishing gear, or in Article 98 (1) (k) for fishing with prohibited gear. .

The Union of the Comoros has already documented the provisions of this paragraph in the Summary of BFIA's submitted by the individual Contracting Parties, Cooperating non-Contracting Parties, Participating Fishing Entities and Cooperating non-Participating Fishing Entities (Annex S-SC4 Report).

Provision of paragraph 9 (1) (a), (iv):

For the moment, the two vessels respect the protocol of collaboration, which we set up in particular the prohibition to carry out fishing activities in the area of competence of the SIOFA without being registered. In addition, with regard to the prohibition of fishing in the prohibited areas of SIOFA, provisions in the new revised Fisheries Act, in its Article 98-1 (m), give severe penalties to vessels fishing in prohibited areas, with the possibility of confiscation of catches.

Moroni, July 31, 2019.