

COFI 35 – WRITTEN CORRESPONDENCE PROCEDURE

RECEIVED COMMENTS FROM OBSERVERS

A – BASIC INFORMATION

Document Number	COFI/2022/9
Document Title	Developments in global and regional processes related to fisheries and aquaculture
Commenting Observer	The Bay of Bengal Programme Inter-Governmental Organisation (BOBP-IGO)
Referred paragraph numbers (if applicable)	-

B – COMMENT RECEIVED

The Bay of Bengal Programme Inter-Governmental Organisation (BOBP-IGO) would like to thank the Food and Agriculture Organization of United Nation (FAO) for organizing the 35th Session of the Committee on Fisheries (COFI). As a Regional Fisheries Body having its route in FAO programme, we feel strongly connected to the process and appreciate this chance of contributing to the global agenda.

The BOBP-IGO took note of the Agenda Item Number 11, placed before the COFI-35. We appreciate the important role played by FAO and the FAO-supported regional fishery body secretariats' network (RSN) during the intervening period.

However, the BOBP-IGO noted with deep concern that even after 21 years since IPOA-IUU, IUU fishing is still rampant today. The BOBP-IGO represents one of the largest concentration of the small-scale and artisanal fishers, who are unjust victims of the IUU fishing. Over the years, IUU fishing has graduated from a fisheries management challenge to a criminal activity where human trafficking, smuggling, money laundering and slavery are prominent. The BOBP-IGO strongly supports the development of regional coordination mechanisms to combat IUU fishing. Such a mechanism should be based on information and knowledge exchange as well as harmonious regulatory measures.

Given that RFABs and RFMOs do not have any judicial powers, the Secretariats of regional bodies should coordinate with each other and inform their respective members. We also observe with concern that a majority of the RFABs and RFMOs do not have direct provisions on curbing of IUU fishing as a mandate; rather it is derived from primary needs of conservation and fisheries management. Therefore, there is a need to strengthen and support the RFAB and RFMO Secretariats to fully understand and internalize the IUU combat process. The RSN, which is playing a coordinating role now, may consider undertaking this additional role.

To enhance the role of RFABs and RFMOs, it is also necessary that cooperation is extended to other transboundary issues such as exchange of information on management of shared stocks, ecosystem, impact of climate change, fisheries MCS, etc. The FAO may consider the Mozambique Plan, an outcome document from the Regional Consultative on the Development of a Coordination Framework between RFBs in the Indian Ocean, held at Maputo, Mozambique, during 22-24 June 2022, where key areas of cooperation were identified.

We also like to raise our concern about the Safety at Sea for fishers especially that of the small-scale and artisanal fishers. Over the past decade, we observed four key trends in the Bay of Bengal, which are likely to be similar with the global trend.

Firstly, the average distance from the shore and duration of fishing across the fleet categories has increased. Keeping aside the factors responsible for the increase, it can be concluded that exposure to risk of the fishers has been amplified across the board. Secondly, owing to a port-led development strategy in the region, as reported in the 27th April, 2013 issue of The Economist, there is an increase in shipping traffic and collateral risk of collision between shipping and fishing traffic. Many such incidences ended in human tragedies. Thirdly, due to increasing intensity and unpredictability of the natural hazards, such as cyclones, risk of fishers both at sea and land has increased. However, their social security net remains non-existent. Finally, there is a grey area in case of implementation of safety at sea and decent working conditions. Usually three Ministries/Departments, viz., Shipping, Labour and Fisheries are responsible to varying degrees for ensuring labour condition on-board fishing vessels. However, there is no mechanism to bring synergy amongst these Ministries/Departments.

Given the above context, the BOBP-IGO urges the FAO and its members to include the following actions in their work programmes:

- Developing regional and national plans on safety and decent work in fisheries, to provide guidance to the national authorities as well as understanding the need of the national authorities to ensure safety and decent work in fisheries.
- Preparation of an illustrated guide and a conduct of training programmes to educate the fishers about the rules of vessel navigation and international sea routes, which often pass through the fishing ground.
- Guidelines and regional consultation on building sturdy fishing vessels fit for longer voyage and have better on-board working condition.
- Training programme and awareness building of the Government officials and social workers on decent working conditions in fisheries.
- Guidelines, awareness and advocacy to encourage the Governments to include decent working conditions in fisheries regulations.
- Guidelines for development of social security net including insurance in the spirit of the human right based approach to improve social security of the fishers.
- Study on the status of migrant workers including the possibility of their social exclusion and its mitigation.
- Building evidence on relation amongst stock status, safety at sea, working condition and the fisheries management regime to develop holistic measures.
- Translation of important manual and guidelines in vernacular languages to ensure the last mile connectivity of key messages.