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**ENSURING THE EFFECTIVE CONSERVATION AND MANAGEMENT OF BIGEYE TUNA IN
THE WCPO**

**WCPFC17-2020-OP05
18 November 2020**

Submitted by Organisation for the Promotion of Responsible Tuna Fisheries (OPRT)



OPRT

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November 18, 2020

Mr. Feleti P. Teo
Executive Director
Western and Central Pacific Fisheries Commission

Ensuring the effective Conservation and Management of Bigeye tuna in the Western and Central Pacific Ocean

Dear Mr. Teo,

It is an honor for me to communicate with you on behalf of the members of the Organization for the Promotion of Responsible Tuna Fisheries (OPRT) and to convey their views to you.

The OPRT membership includes associations in a number of countries representing large-scale tuna longline vessels with ultra-low-temperature freezers, associations representing distributors handling sashimi tuna in Japan, and a national liaison committee of consumer organizations in Japan. Our objective is to ensure that tuna fisheries are carried out in a responsible manner that includes restricting the total number of registered vessels.

Taking this opportunity, I would like to express our respect to you as Executive Director of the WCPFC. We look forward to the promotion of conservation and sustainable use of tuna and tuna-like species in the western and central Pacific Ocean (WCPO) under your leadership.

I would also like to extend our appreciation for your efforts to prepare meeting arrangements in the COVID-19 pandemic situation this year..

OPRT members have been deeply concerned about the current and future status of the bigeye stock in the WCPO, as mentioned in the letters addressed to you and your predecessor dated July 22, 2013, July 4, 2014, July 28, 2015, September 16, 2016, October 3, 2017, October 29, 2018 and November 11, 2019. The WCPO bigeye stock is of the greatest importance to our fisheries, distribution sectors and consumers.

We have been carefully examining a series of stock assessments and management recommendations for the WCPO bigeye tuna made by the Scientific Committee.

Three years ago, we were greatly surprised to know the major outcomes from SC13 with respect to stock assessment for the WCPO bigeye, and we are deeply concerned about the high level of uncertainty which the Scientific Committee itself admitted at SC13, SC14 and SC15. We considered that

there would be a high probability that irreparable damage to the WCPO bigeye stock would occur if CMMs were developed and implemented, according to information from the 2017 and 2018 assessments for bigeye.

One of the reasons for our concern is the fact that the new growth curve which has been used in lieu of the old one in the stock assessment process since 2017 (which CMMs 2017-01 and 2018-01 rely on) has not been confirmed as more plausible than the old one although the Scientific Committee has described a series of research recommendations in order to confirm the appropriateness of the new aging and growth curve and eventually reduce the level of uncertainty in the new stock assessments conducted in 2017 and 2018.

These new stock assessments are substantially optimistic compared to previous ones. However, a fairly large degree of uncertainty concerning the results of the new stock assessments conducted in 2017 and 2018 has been recognized. This coupled with the fact mentioned above concerning the plausibility of the new growth curve has caused us to be deeply concerned about the appropriateness of the basis for the new CMMs referenced above.

To reiterate this point, OPRT remains greatly concerned about the measures stipulated in CMM 2017-01 which was developed and adopted at WCPFC14 in December 2017 employing the results of the 2017 assessment from SC13 and CMM 2018-01 includes almost the same provisions of CMM 2017-01.. Those measures were substantially weakened compared to those included in previous CMMs for tropical tunas.

In this connection, a new stock assessment for the WCPO bigeye tuna was conducted this year and seems to have the same problems that previous assessments since 2017.

According to paragraph 11 of Summary Report of SC16 although it was unfortunate that “due to the constraints originating from the virtual online Scientific Committee forum, the SC16 could not fully engage in a complete discussion”, we look forward to sensible and constructive suggestions to be developed by “further research on the assessment model, including peer review”, that will lead to the reduction in the uncertainty mentioned above to an adequate levels,

However, it is obvious that such work takes a certain period of time and we have to act in a cautious manner until the uncertainty is resolved.

WCPFC 17 is expected to consider a successor CMM for CMM 2018-01.

We hope that the following views will be considered positively by you and the parties of the WCPFC (Upload this as an NGO Paper will be appreciated).

Those views have been prepared based on the views expressed during

the OPRT membership meeting held on June 10, 2019 with updated information and data, and we consider that these views are still valid.

We also hope that they will be reflected in their work in preparation for and in deliberations at the forthcoming WCPFC17, so that WCPFC17 may be a fruitful meeting.

We look forward to your kind assistance.

Best regards,



Daishiro Nagahata
Managing Director

1. Because of the high level of uncertainties it is premature to develop and implement CMMs based on the new stock assessments including this year's one. A truly precautionary approach should be applied.

We consider that science must be respected in developing conservation and management measures for fish stocks including the Western Central Pacific Ocean (WCPO) bigeye stock. However, since August 2017 we have been deeply concerned about the results of the stock assessment for the WCPO bigeye stock conducted at SC13 that contains a high level of uncertainties. Looking at the outcomes from SC14 held in August in 2018, SC15 held in August last year and SC16 in August this year, our concern has not been alleviated.

The level of uncertainty for these new stock assessments associated with the growth curve and regional division is considered basically unchanged from the 2017 assessment. It is assumed that such uncertainties cannot be resolved immediately. In fact, the new growth curve which has been used in lieu of the old one in the stock assessment process since 2017 and on which CMMs 2017-01 and 2018-01 are dependent has not been confirmed as more plausible than the old one although three years have passed since August 2017.

However, WCPFC15 held in December 2018 decided that application of almost the same provisions of CMM2017-01 which is dependent on the new stock assessment will be extended until 2020 by adopting CMM 2018-01.

WCPFC17 is required to consider a successor CMM for CMM2018-01 which will terminate after 10 February.

Considering the problems associated with the new stock assessments mentioned above, we again urge the Commission, in accordance with a precautionary approach, to refrain from taking actions based on the results of new assessments, which could lead to irreparable damage to the WCPO bigeye stock.

In this connection, it should be highlighted that SC14, SC15 and SC16 noted that, regardless of the choice of uncertainty grid, the assessment results show that the stock has been continuously declining for about 60 years since the late 1950's, except for the recent small increase (e.g. paragraph 18. of Summary Report (SR) of SC16). This has amplified our concern.

Therefore, we request the following:

- (1) The work to reduce the level of uncertainty of new stock assessments associated with, *inter alia*, age determination methodology and growth curve derived from the result of such age determination, and the change

in regional areas for the assessment should be expedited as a matter of priority. In addition, further research on the assessment model, including the peer review should be conducted in an expedited manner, as highlighted in paragraph 11. of the Summary Report of SC16.

- (2) Until the uncertainty included in these new assessments becomes adequately resolved, the work utilizing simulations should also be expedited to provide a basis for establishing conservation and management measures. Such simulation work is expected to create various results and provide information on the possible impacts on relevant stock assessments according to a series of cases such as: where differences are detected in growth curve for bigeye between the eastern Pacific Ocean (EPO) and the WCPO; where differences are detected for bigeye even within the WCPO; and various aspects related to the WCPO - EPO overlapping areas. In addition, stock assessment utilizing the old growth curve should be conducted;

Incidentally, such simulation work would also greatly contribute to the development of the Operational Model (OM) to be incorporated in the relevant Management Strategy Evaluation (MSE) scheme.

- (3) The regional division issue in the stock assessment which is one of the major factors producing the high level of uncertainty in the new stock assessment should be addressed to reduce the level of uncertainty related to this issue; and
- (4) Until the high level of uncertainty included in the new assessment becomes adequately resolved, a truly precautionary approach should be taken for the conservation of the WCPO bigeye stock by applying the previous CMM 2013-01 or a refined CMM that may be developed based on results of the simulation work mentioned in paragraph (2).

2. The situation that the longline fishery has been facing should be duly considered in developing and establishing Target Reference Points for the WCPO bigeye and yellowfin stocks. Relevant work should be expedited.

WCPFC16 decided to modify the work schedule to establish TRPs for bigeye and yellowfin stocks. In this work process, the following should be duly considered:

- (1) While purse seine operations associated with Fish Aggregating Devices (FADs) and other floating objects have significant impacts on the WCPO bigeye and yellowfin stocks by harvesting a large amount of juveniles of these species in tropical areas in the WCPO, many longline fishing vessels are targeting bigeye and/or yellowfin tunas and are

suffering from decreased size of spawning stocks. Therefore, careful deliberations should be conducted for all sectors of fisheries related to the WCPO bigeye and yellowfin stocks;

- (2) In establishing the TRP for the southern albacore stock in December 2018, the Catch per Effort Unit (CPUE) for the major longline fishing sector was considered. Similar consideration should be included in deliberations to establish TRPs for bigeye and yellowfin;

[Relevant Paragraph of Summary Report of SC 15 Paragraph 131.]

.....While SC15 noted that the main biological consideration for a TRP is that it should be sufficiently above the LRP, SC15 also noted that the choice of a TRP can be based on a combination of biological, ecological and socioeconomic considerations. In this regard consideration of other factors (such as CPUE and the financial performance of typical vessels) in the selection of candidate TRPs would be welcome.

- (3) In connection with the establishment of TRPs for bigeye and yellowfin, it is widely known that excessive catch of juveniles will lead to substantial deterioration of the stocks concerned, will decrease the level of Maximum Sustainable Yield (MSY) and will require larger amount of spawning biomass to achieve the same level of MSY compared to catches where juveniles account for smaller portion of the total.

Therefore, WCPFC is urged to take effective measures to rectify the situation to sufficiently reduce such adverse impacts.

[Relevant paragraphs]

- i) SC 14 (therefore) recommends that WCPFC15 could continue to consider measures to reduce fishing mortality from fisheries that take juveniles, with the goal to increase bigeye fishery yields and reduce any further impacts on the spawning biomass for this stock in the tropical regions. (Paragraph 179.: SR of SC14 (Management advice including this is still most recent))
 - ii) WCPFC could consider measures to reduce fishing mortality from fisheries that take juveniles, with the goal to increase to maximum fishery yields and reduce any further impacts on the spawning potential for this (the WCPO yellowfin) stock in the tropical regions (Paragraph 38 (255): SR of SC10 (Management advice including this is still most recent)); and
- (4) In order to develop a more effective and workable OM to be incorporated in related MSE(s) in the future, it is necessary to commence and expedite the simulation work mentioned above in 1. (2).

3. Contributions from CCMs with major longline fleets should be duly considered

In the future deliberations to develop conservation and management

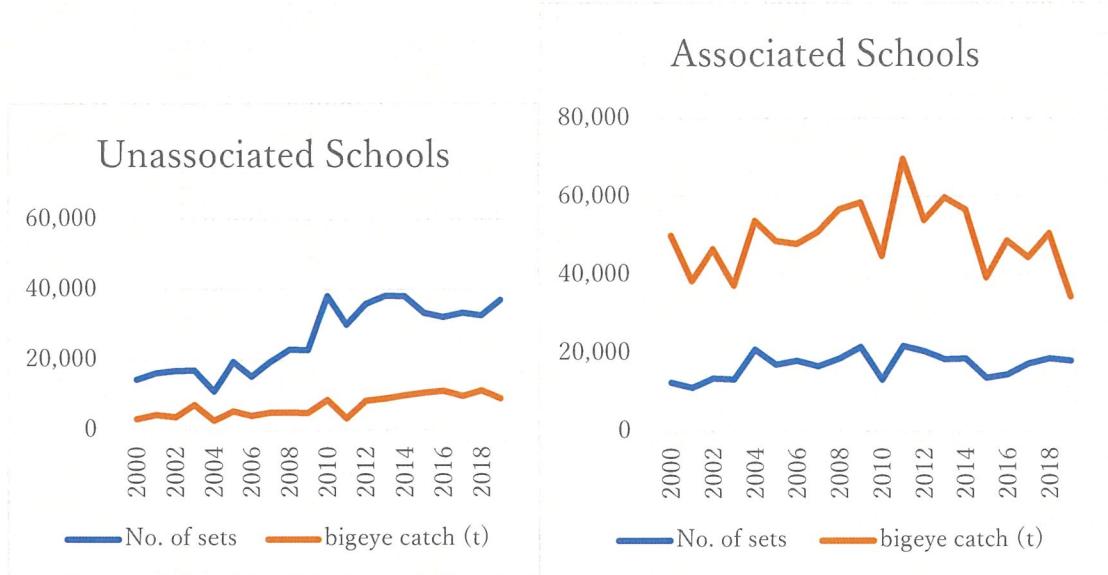
measures and other related issues, the following fact should also be duly considered: 5 CCMs - China, Japan, Korea, Chinese Taipei and the USA (all except the USA have OPRT member associations) have major longline fisheries subject to the reduction schedule for bigeye catches by longline fisheries from 2014 to 2017 (Appendix F of CMMs 2013-01, 2014-01, 2015-01 and 2016-01). The relevant longline fisheries industries have expended utmost efforts to reduce their catches in accordance with the catch reduction schedule regardless of whether the additional measures described for purse seine fisheries in the afore-mentioned CMMs are actually implemented or not. These endeavors by those longline industries are expecting the implementation of further effective restrictions on purse seiners' FAD settings which should lead to a reduction in fishing mortality of juvenile bigeye tuna by purse seine fisheries to realize the recovery of the WCPO bigeye stock.

4. Free-school operations should be further promoted.

Basically, fishing mortality from respective fishing gear types should be controlled by means of output control, such as catch quota by fishing gear by country. For example, as mentioned above in 3. Six CMMs (China, Indonesia, Japan, Korea, Taiwan and United States) with major longline fleets have been subject to catch limits for bigeye by longline by CCM. Likewise, bigeye catches by purse seine, other longline and other fisheries should be similarly treated. We believe that this will be necessary to make future Harvest Control Rules (HCRs) function properly.

Pending such arrangements, free-school operations should be further promoted, and settings associated with floating objects including FADs should be further decreased. This endeavor would no doubt bring about a substantial reduction in the catch of juvenile bigeye and yellowfin while ensuring the catch of skipjack which is the target species for purse seine settings associated with FADs, and will lead to improved stock conditions for bigeye and yellowfin in the WCPO (Please refer to the figures illustrated below).

Purse seine catch and effort by set type in the WCPPO between 20 °N and 20°S [Source: WCPFC-SC16 2020/GN IP-1 rev 3, P70 Table A3.]



Time series showing the percentage of total sets (left) and total catch (right), by school type for the major purse-seine fleets operating in the WCP-CA.
 [Source: WCPFC-SC16 2020/GN IP-1 rev 3, P7 Figure 3.2.2]

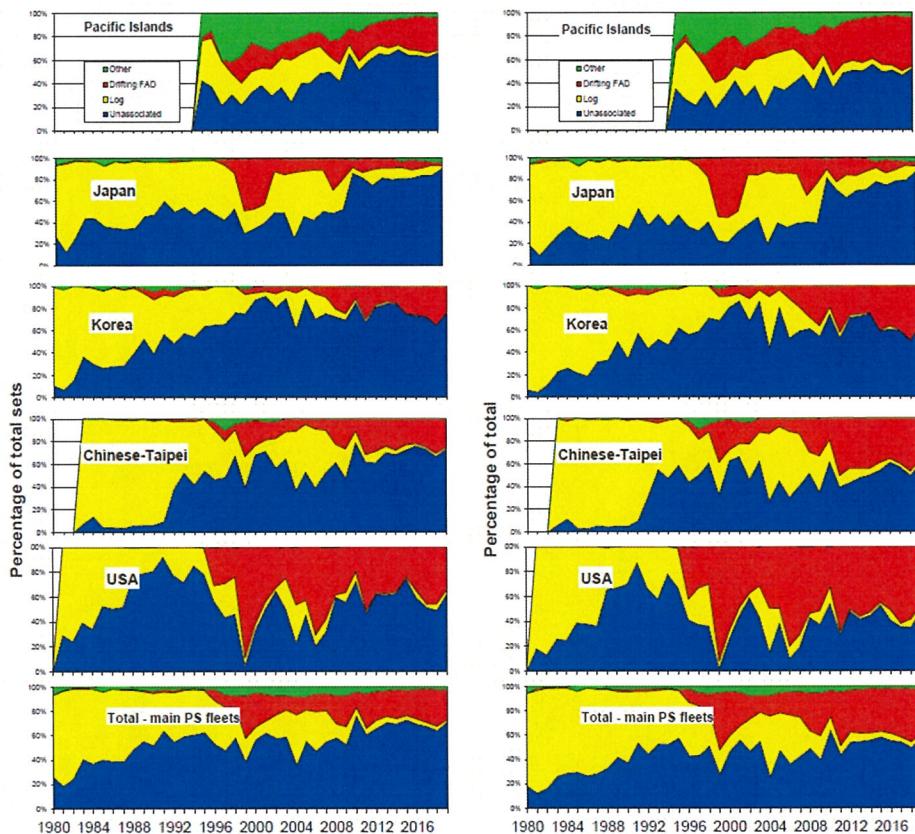


Figure 3.2.2 Time series showing the percentage of total sets (left) and total catch (right), by school type for the major purse-seine fleets operating in the WCP-CA.