



**COMMISSION  
FOURTEENTH REGULAR SESSION**  
Manila, Philippines  
3 – 7 December 2017

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**LETTER TO WCPFC ON SUSTAINABILITY OF TUNA STOCKS**

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**WCPFC14-2017-OP08**  
**28 November 2017**

**Submission by International Seafood Sustainability Foundation (ISSF)**

27 November 2017

ATTN: Heads of Delegation to the 14<sup>th</sup> Regular Session of the Western and Central Pacific Fisheries Commission (WCPFC)

Dear Delegates:

We submit this letter on behalf of the undersigned companies, non-governmental organizations and fishing industry associations all who recognize that the sustainability of tuna stocks is central to businesses and livelihoods, as well as the health of the marine environment. Our companies represent the catch sector and seafood buyers that source seafood products from the diverse international supply network. Our non-governmental organizations work across the world with the catch sector, and engage suppliers and provide advice to retailers, buyers and food service sectors regarding improvements in tuna sustainability. Our fishing industry associations represent a variety of gear types, including purse seine, longline, troll, pole and line and handline vessels active in tuna fisheries worldwide.

During the 2017 Regular Session of the WCPFC, we are seeking your leadership on four critical areas that are fundamental to sustainable tuna management and that necessitate immediate action:

- Progressing the development and adoption of Harvest Strategies;
- Adopting a precautionary conservation and management measure for tropical tuna species (the bridging measure);
- Adopting provisions for the use of non-entangling Fish Aggregating Device (FAD) designs, and other precautionary FAD management measures; and
- Increasing observer coverage in longline fisheries including through the use of human and electronic monitoring.

We applaud the initial progress that WCPFC has made, such as the adoption of biologically-based limit reference points and a detailed harvest strategy work plan for the major tuna stocks, standards, specifications and procedures (SSPs) for electronic reporting of operational catch and effort data, and the current FAD management measures for tropical tunas. However, WCPFC must take accelerated action at this year's Commission meetings to:

**1. Progress the development and adoption of Harvest Strategies for key tuna stocks consistent with the time-frames and actions in the Commission's agreed work plan by:**

- Adopting performance indicators for yellowfin and bigeye tunas;
- Developing harvest control rules and management strategy evaluation for skipjack tuna and South Pacific albacore by 2020; and
- Adopting an interim target reference point (TRP) for south Pacific Albacore that was originally scheduled to be agreed in 2015.

**2. Adopt a precautionary conservation management measure that meets the scientific advice for all species.**

We urge that the Commission to adopt a precautionary conservation and management measure that ensures bigeye and yellowfin tuna fishing mortality does not increase from current levels until the Commission can agree on appropriate TRPs, and maintains skipjack tuna close to its agreed interim TRP.

The bridging measure must also address the deficiencies in the previous management measure, particularly with respect to enforceability and rigorous scientific monitoring to ensure it is achieving its conservation objectives. In addition, it must also avoid exemptions and optional clauses that undermine the current management measure.

In addition, we ask the Commission to take further steps to support, and to minimize risks to, the full implementation of the bridging measure, such as strengthening the management of at-sea transhipment and management of fishing capacity.

**3. Adopt the use of non-entangling FAD designs as proposed in the Draft Bridging Measure for Tropical Tunas, and other precautionary FAD management measures.**

As the world's largest tuna fishery, FAD management is critical to long-term tuna sustainability in the Western and Central Pacific Ocean (WCPO). The WCPFC is the only tuna RFMO that has yet to adopt a measure for the use of non-entangling FAD designs. We call on the Commission to address this conservation

concern as a matter of urgency through the adoption of provisions for the design and deployment of non-entangling FADs, either as a stand-alone measure or as part of the bridging measure.

The Commission must also urgently adopt measures for the management of FADs in the WCPO, such as science-based limits on FAD deployments and/or FAD sets, and require that FAD buoy tracking data be provided to the relevant national authorities and Scientific Committee with appropriate time lags to protect commercially-sensitive information and ensure confidentiality.

To support these actions, we urge the Commission to adopt the Scientific Committee's recommendations to add a new section of 'FAD Information' in the Regional Observer Program Minimum Standard Data Fields, enabling the collection of additional FAD data to support effective management.

#### **4. Increase minimum observer coverage on longline vessels through the use of both human and electronic means.**

Observers, and the data they collect, are integral to the work of the Commission and an essential component of monitoring of tuna fisheries. The minimum 5% observer coverage for longline vessels must be increased to a level appropriate to provide rigorous scientific data, including reasonable estimates of total bycatch, and to improve the overall monitoring of the fishery. We urge the Commission to immediately increase the minimum mandatory observer coverage rates to 20%, as has been recommended by the scientific committees of ICCAT and IATTC, and to ultimately require 100% observer coverage in the longline, fishery as is required for purse seine vessels, through the use of electric monitoring (EM).

We note that there are several EM projects and trials underway demonstrating the utility and success of EM systems in collecting almost all the required data fields that are collected by human observers. Therefore, we also urge the Commission to adopt guidelines and standards for using EM as a matter of urgency. We also recognize the critical need to have near real-time observer data and, to that end, we encourage the adoption of the electronic reporting standards for observer data as recommended by the Technical and Compliance Committee.

Finally, we remain very concerned that the minimum 5% observer coverage is not being achieved by some longline fleets. We strongly urge the Commission to take steps to sanction those States that continue to fail this minimum requirement.

We request that your government, as a WCPFC leader, to take active steps to ensure significant progress on these issues at forthcoming WCPFC Commission meeting, as a matter of priority.

Sincerely,



A handwritten signature in blue ink that reads "Anthony R. Snow".



A handwritten signature in black ink that reads "H. Factors".



A handwritten signature in black ink that reads "Katee Bell".



A handwritten signature in black ink that reads "Cleo Small".



A handwritten signature in black ink that reads "Sarah O'Brien".





Toh Ag



Olivia Edwards



Margaret Spring



Bethany



Protecting nature. Preserving life.



Mel

Mark Derry



Susan Stetler

Amanda L.



Angela Lindsey



Ram B. Costa





*Tom Pfeiffer*



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*Andy Smith*

Andy Smith  
OPERATIONS MANAGER  
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*Renato Arce*



Doug Saunders-Loder  
Chairman



*Alfred Lee Cork Jr.*