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**NINETEENTH REGULAR SESSION**  
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**FFA POSITIONS ON KEY ISSUES FOR WCPFC19**

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**WCPFC19-2022-DP03<sup>1</sup>**  
**28 October 2022**

FFA Member CCMs

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<sup>1</sup> The Attachments referred to within this letter are posted as separate WCPFC19 papers



28 October 2022

Ms Jung-Re Riley Kim  
Chair  
Western and Central Pacific Fisheries Commission  
PO Box 2356, Kolonia  
Pohnpei  
Federated States of Micronesia

Dear Chair

#### **FFA POSITIONS ON KEY ISSUES FOR WCPFC19**

I write on behalf of the 17 members of the Pacific Islands Forum Fisheries Agency to share our position on key issues for the 19th session of the Western and Central Pacific Fisheries Commission. This is without prejudice to the positions of FFA members individually or collectively.

FFA members are very much looking forward to our first face-to-face meeting with all CCMs in three years. While we have been able to transact some significant work virtually, there is no doubt that we are collectively more productive in a physical meeting environment. We look forward to working closely with other Members to make substantial progress on key issues for the Commission meeting in Da Nang.

The priority items for FFA members at WCPFC19 are:

#### **Skipjack Management Procedure**

The Western and Central Pacific Ocean (WCPO) skipjack tuna stock is the largest tuna stock in the world and is critical for global tuna canning supplies, other commercial tuna products and small-scale, artisanal and subsistence fisheries. The effective management and sustainable use of this stock is important both to the peoples of the states in whose waters this stock occurs and to the fleets that harvest them. The skipjack tuna stock is especially important for Small Island Developing States (SIDS) and Territories, for some of which this stock is the natural resource on which their sustainable development most heavily depends.

In accordance with CMM 2014-06, FFA members are pleased to submit a draft Conservation and Management Measure (CMM) that describes a management procedure (MP) for skipjack tuna in the WCPO (Attachment A).

The proposed MP is designed to improve decision-making by specifying predetermined levels of fishing on WCPO skipjack tuna stocks, based on the performance of the fishery. Not only will the adoption of this MP take better account of uncertainty, including the uncertainties related to climate change, it will also be an important step in ensuring the effective management and sustainable use of the stock, and meeting the interests of global markets in sourcing sustainable tuna products.

The draft CMM has been assessed against requirements of CMM 2013-06 on the Criteria for the Consideration of Conservation and Management Proposals.

### **Compliance Monitoring Scheme (CMS)**

FFA Members continue to reiterate our concern regarding the imbalance in the operation of the CMS between purse seine and longline obligations and echo the recommendation from TCC18 for the Commission to address this imbalance. We note the current measure deferred the review of the draft CMR this year so that the focus would be on progressing certain elements of the CMS. While we recognise there has been significant work undertaken on some of these issues that will be considered at WCPFC19, we note that there is still much to be done. We look forward to working together with all CCMs to improve and enhance the CMS.

### **Electronic Reporting (ER)**

Electronic reporting is a timely and more accurate way to collect data to inform the work of the Commission and the Scientific Services Provider and improve compliance with the data submission obligations of CCMs. As we have done in the past, FFA Members together with other CCMs at TCC18 recommended that WCPFC19 agree that CCMs shall submit operational catch and effort data in accordance with the agreed Standards, Specifications and Procedures for Electronic Reporting in the WCPFC from 1 January 2024. In support of the TCC18 recommendation, FFA Members are pleased to submit the proposed amendment to CMM 2013-05 (Attachment B). FFA Members have already made a commitment to adopt ER for fishing vessels within our EEZs and on the high seas and it is time for the Commission to put in place a compatible obligation for the high seas.

### **Electronic Monitoring (EM)**

FFA Members are committed to strengthening the monitoring of fisheries under the jurisdiction of the Commission, particularly those that lack data to enable independent verification. FFA Members have worked extremely hard to progress EM and we acknowledge the complexities of this work. FFA Members have progressed the development of EM Standards, Specifications and Procedures (SSPs) over the last 12 months. In May 2022, FFC122 endorsed the FFA Final Draft EM SSPs as interim guidelines, noting these will continue to be reviewed and revised as Members build their experience with EM. FFA Members are pleased to share this work with the



WCPFC, as an Information Paper, to help progress the work on the development of SSPs by the ERandEM Working Group.

### **South Pacific Albacore**

The effective management of the southern longline fishery is of strategic importance for our members. We anticipate constructive engagement with all CCMs as we work to progress the improved management of this key fishery through the harvest strategy approach and the implementation of zone-based management.

FFA Members support a review of the management objectives for this important stock, given the recalibrated iTRP required to achieve the current objective is untenable. We will work with all CCMs through the IWG in order to bring a new management objective and TRP to the Commission in 2023.

### **Tropical Tuna Measure (TTM)**

FFA Members note the requirement of CMM 2021-01 for the Commission to commence a process in 2022 to reach agreement in 2023 on hard effort or catch limits for the high seas for the purse seine fishery and to develop a framework for the allocation of those limits in the high seas. Similarly we note the requirement to commence a process in 2022 to reach agreement in 2023 on hard limits for bigeye tuna and a more equitable allocation framework for fishing opportunities for the longline fishery.

FFA Members will consider a focused process to work on the TTM in 2023 that prioritises the issues of an overarching hard limit for purse seine effort on the high seas and a framework for the allocation of that limit. The resolution of these issues is critical to ensure the effective implementation of the skipjack tuna management procedure.

We consider this work, which supports the strengthening of zone-based management to protect the rights and interests of all SIDS and Territories, should be the focus for a single Commission workshop on the TTM in 2023.

FFA members seek to improve the alignment of the TTM with the skipjack tuna management procedure while maintaining the current balance of interests between fisheries and CCMs which has been achieved in the current TTM. The capacity of smaller FFA administrations to effectively engage in this process necessarily limits our Members to a single, focused, WCPFC workshop. However, FFA Members will seek bilateral engagement with other CCMs during 2023 to further progress this essential work.

Noting the need to prioritise work that will ensure the effective implementation of the skipjack tuna management procedure through addressing the high seas purse seine limits, and also noting the broad range of other work on the Commission's agenda for 2023, FFA members propose to defer discussions on determining limits and allocation for bigeye tuna in the longline fishery to 2024.

## **Proposed Amendment to CMM 2014-06 on Harvest Strategies**

FFA Members wish to draw the Chair's attention to our proposed amendment to CMM 2014-06 on Establishing a Harvest Strategy for Key Fisheries and Stocks in the Western and Central Pacific Ocean.

Our proposed amendment should benefit all CCMs with tuna fisheries certified under the Marine Stewardship Council (MSC) Fisheries Standard which requires explicit reference by the management body, that is the Western Central Pacific Fisheries Commission, to adopt harvest control rules (HCRs) before the stock declines below  $B_{MSY}$ .

FFA Members propose that the Commission amend CMM 2014-06 by including text that satisfies this specific requirement of the MSC Fishery Standard (Attachment C). We note that the proposed text does not apply to the Pacific bluefin and north Pacific albacore tuna stocks for which HCRs are in place. We also note that in general, the WCPFC applies depletion-based metrics in its harvest strategy work for the key tropical tuna stocks and it remains a Commission decision to decide on what basis we determine the status of stocks in relation to  $B_{MSY}$ .

The proposed amendment to the CMM does not alter the broader and more important requirement for the WCPFC to adopt well defined HCRs for each of the tropical tuna stocks, but ensures that over 40 certified WCPO fisheries for south Pacific albacore, bigeye, skipjack and yellowfin tuna will retain their certification while the work required to adopt well defined HCRs is undertaken within the timeframe and to a standard required by MSC.

### **South West Pacific Swordfish**

FFA members are committed to strengthening the CMM for South West Pacific Swordfish. The current measure for this stock (CMM 2009-03) contains no restrictions on fishing mortality in the high seas area north of 20°S and contains flag-based limits south of 20°S that, in combination with unconstrained catches north of 20°S, may be too high to prevent future overfishing. Subsequently, it lacks the overall provisions required to ensure the ongoing sustainability of the stock and does not protect either future fishery development opportunities for SIDS nor the economic viability of current fisheries targeting swordfish or fisheries for which swordfish is an important economic bycatch.

FFA members note that over the past three years a large suite of work has been undertaken within the WCPFC processes to ensure that a revised and strengthened CMM can be developed based on the latest relevant fisheries information, data and science. Utilising that information and following consultations with the Scientific Committee and Technical and Compliance Committee in 2022, FFA members are now pleased to provide to the Commission a proposal for a strengthened CMM for South West Pacific Swordfish (Attachment D).

The measure is designed around key principles of importance to the FFA, including zone-based management approaches, compatible management and limits on the high seas, the sovereign rights of coastal States and the special requirements of, and to avoid transferring a disproportionate burden of conservation upon, SIDS and Participating Territories. We look



forward to constructive engagement with Commission members to finalise this measure for adoption by the Commission at WCPFC19.

### **Labour Standards**

Improving labour standards for crew was underlined recently by our Pacific Leaders as a key priority. FFA Members remain committed to progressing the development of an effective CMM on crew labour standards. FFA Members have been strongly encouraged by the engagement of CCMs throughout the intersessional working group and look forward to the upcoming meeting and further discussions at WCPFC19.

### **Observer Redeployment**

FFA Members reiterate that the intersessional decisions to extend the temporary suspension of observer coverage requirements because of COVID-19, starting in March 2020, have impacted the livelihoods of Pacific Island Fisheries Observers and their families and has led to a lack of vital scientific and MCS information over this period.

FFA Members have developed COVID-19 safety protocols that provide the basis for safe redeployment of observers back on fishing vessels by 1 January 2023. Members have also developed an observer redeployment plan that provides guidance for observer embarkation and disembarkation on fishing vessels.

The purpose of the FFA observer redeployment plan is to ensure observers can be safely redeployed on fishing vessels and safely repatriated back to their home port after a fishing trip without contracting or spreading COVID-19.

FFA Members look forward to the lifting of the suspension of the 100% observer requirement and we are ready to recommence observer placements on fishing vessels by 1 January 2023. We look forward to working collaboratively with other CCMs to ensure the redeployment of observers takes place smoothly and safely.

Chair, we stand ready to work with you and other CCMs to ensure that the Commission advances these issues in support of the overall conservation and management of the fish stocks of the WCPO at its meeting this year.

Your sincerely,



Dr Agnes Yeeting

**FFC Chair**

cc: Mr Feleti Teo, Executive Director, WCPFC