Development of a Revised Tropical Tuna Measure Workshop 4
29 to 30 September 2023
Pohnpei, FSM, and online

United States submission on proposed revisions to CMM 2021-01

WCPFC-TTMW4-2023-DP01
9 September 2023

UNITED STATES DEPARTMENT OF COMMERCE
Deputy Assistant Secretary for International Fisheries
Washington, D.C. 20230

Josie Tamate, Ph.D.
Chair, WCPFC

September 7, 2023

Dear Madam Chair,

The United States appreciates your leadership and guidance as the Commission revises CMM 2021-01 on tropical tunas and we look forward to meeting in-person in Pohnpei to make progress on this conservation and management measure.

The United States would like to propose revisions as outlined in the attached table and accompanying documents for consideration as we work together to revise the TTM. Please note that this is only our initial views for consideration and we expect additional U.S. positions to be developed based on the SC report-out on the key questions developed during TTMW3 and discussions with other CCMs.

Note that our proposed revisions related to biodegradable FADs are aligned with similar recent decisions of the IATTC and would foster consistent implementation across RFMOs.

Sincerely,

Kelly A. Kryc

Kelly A. Kryc, Ph.D.

The United States' Initial Proposed Revisions to CMM 2021-01 for TTMW4

CMM 2021-01	Proposed Text / Action for CMM 2023-01
Preamble	Insert text, after ***Acknowledging*** that the Commission has adopted CMM 2014-06… and before ***Recognizing*** the United Nations' Climate Change Sustainable Development Goal: ***[Acknowledging*** that the Commission has adopted CMM 2022-01 which established a Management Procedure for WCPO Skipjack Tuna;]
Between Paragraphs 4 and 5	Insert text in the section title: **Small Island Developing States [and Participating Territories]**
Paragraph 7	Revise text: (b) the special circumstances of a [SIDS] ~~[State]~~ which is surrounded by the exclusive economic zones of other States and has a limited exclusive economic zone of its own; and
Paragraph 12	Revise text: *12. The spawning biomass of skipjack tuna is to be maintained on average at a level consistent with the [~~interim~~] target reference point [contained in] [~~of 50% of the spawning biomass in the absence of fishing, adopted in accordance with~~] CMM [2022-01] [~~2015-06~~] [on a Management Procedure for Skipjack Tuna].*
Paragraph 14	The U.S. would like to keep this open for updating pending the outcome of the SSP data requests.
Paragraph 15	The U.S. would like to keep this open for updating pending the outcome of the SSP data requests.
Paragraph 18	Replace paragraph 18:

	18 alt. To reduce the amount of synthetic marine debris: *a) as of 1 January 2026, CCMs shall only allow vessels to deploy or redeploy drifting FADs of biodegradability categories I, II, IIIa or IIIb, as defined in Attachment 3;* *b) as of 1 January 2029, CCMs shall only allow vessels to deploy or redeploy drifting FADs of categories I or II, as defined in Attachment 3;* *c) At the annual meeting in 2029, the Commission shall decide whether to require by 2031 CCMs to only allow vessels to deploy or redeploy drifting FADs of Category I as defined in Attachment 3.*
Between Paragraphs 18 and 19	Add new paragraph 19: *19 bis. Notwithstanding paragraph 18, the use of non-biodegradable materials, in particular nylon ropes, can be used exclusively to strengthen the structure of the floating or underwater component of the FAD categories I & II, as a temporary solution and only provided no biodegradable alternative is available.*
Paragraph 19	Revise the text: *The Scientific Committee shall continue to review research results on the use of biodegradable material on FADs, and shall provide specific recommendations to the Commission in [~~2022~~] **[2025]** including [~~on a definition of biodegradable FADs, a timeline for the stepwise introduction of biodegradable FADs~~] the feasibility of Category I FADs, potential gaps/needs and any other relevant information.*
Paragraph 20	Delete paragraph
Between Paragraphs 22 and 23	Add new paragraph: *23 bis. In order to support the work of the SSP in analyzing the impact of FAD fisheries, while protecting business confidential data, CCMs shall report, or require their vessels to report, daily information on all active FADs to the SSP. The information provided shall be identical in form and content to the raw satellite buoy data provided by the buoy manufacturers to the original users (i.e., vessels and vessel administrators), as specified in Attachment 4.*

	Reporting shall occur at monthly intervals and with a time delay of at least 60 days, but no longer than 90 days.
Paragraph 37	The United States would like to review the LL catch limits for BET based on the outcome of the SSP data request.
Paragraph 42	The U.S. proposes working with PNA to develop draft LL MCS language.
Paragraph 52	Revise the text such that CMM 2023-01 does not expire but can be renegotiated at any time: *'This measure replaces CMM 2021-01. This measure shall come into effect on ~~16~~ XX February **XXXX** and remain in effect until ~~XXXX15 February 2024~~ unless ~~earlier~~ replaced or amended by the Commission.*"
Attachment 1	Remove the United States' footnote "**" from Table 1: ~~[** The United States notified the Secretariat of the combined US EEZ and high seas effort limits on 1 July 2016 (1828 fishing days on the high seas and in the U.S. EEZ (combined)). The US EEZ limit is understood to be this notified limit minus the high seas effort limit for the United States set out in **Table 2** of **Attachment 1**]~~ AND add the following footnote to the United States Effort Limit in Table 2: *Except for U.S.flagged vessels noticed as operating as an integral part of the American Samoa economy.*
New Attachment	Add CMM 2023-01 Attachment 3
New Attachment	Add CMM 2023-01 Attachment 4

CMM 2023-01 Attachment 3

Categories* of drifting FADs biodegradability levels (from non-biodegradable to 100% biodegradable) for the gradual implementation of biodegradable drifting FADs.

Category I.	The FAD is made of 100% biodegradable materials.
Category II.	The FAD is made of 100% biodegradable materials except for plastic-based flotation components (e.g., plastic buoys, foam, purse-seine corks).
Category III(a).	The subsurface part of the FAD is made of 100% biodegradable materials, whereas the surface part and any flotation components contain non-biodegradable materials (e.g., synthetic raffia, metallic frame, plastic floats, nylon ropes).
Category III(b).	The subsurface part of the FAD contains non-biodegradable materials, whereas the surface part is made of 100% biodegradable materials, except for, possibly, flotation components.
Category IV.	The surface and subsurface parts of the FAD contain non-biodegradable materials.

* These definitions do not apply to electronic buoys attached to FADs to track them.

CMM 2023-01 Attachment 4

Format of the information to be requested to satellite buoy manufacturers

a) Daily information on buoy location

The following data fields should be included for all the buoys and positions recorded during the day, in fishing company-specific csv files:

- date [dd-mm-yyyy],
- time [hh.mm],
- unique buoy identifier code [the format varies for each buoy manufacturer but is always an alphanumeric code],
- IMO of the vessel associated to the buoy and receiving the information,
- latitude [expressed as decimal degrees],
- longitude [expressed as decimal degrees],
- speed [knots].

Additionally, whenever possible, the following information corresponding to each transmission will be included:

- Water temperature.
- Buoy in the water (only for those buoys with sensors that allow identifying buoys in the water)
- Activation and deactivation dates.
- Estate or transmission mode of the buoy (e.g. immediate information, retrieving, etc.)

Data should be received in csv files named "X-YYYY-MM-ZZZZZZZ.csv" where X is the code of the buoy manufacturer (M, S, Z, for Marine Instruments, Satlink, and Zunibal, respectively), YYYY is the year, MM the month, and ZZZZZZZ the name of the fishing company. A single csv file will be prepared for company, year and month.

b) Information on acoustic records

The following data fields must be included for all the buoys and acoustic records recorded daily, in fishing company-specific csv files:

- ZUNIBAL: company, unique buoy identifier code, date (date, time), type (position or sounder), latitude, longitude, speed, drift, total

- SATLINK: Company, unique buoy identifier code, Message Descriptor (MD), date (date, time), latitude, longitude, battery charge (bat), temp, speed, drift, layer1, layer2, layer3, layer4,

layer5, layer6, layer7, layer8, layer9, layer10, sum, max, mag1, mag2, mag3, mag4, mag5, mag6, mag7, mag8.

- MARINE INSTRUMENTS: company, unique buoy identifier code, TransmissionDate, TransmissionHour, lat, lon, mode, light, poll, temperature, vcc, SounderDate, gain, layers, layerbits, maxdepth, sd1, sd2, sd3, sd4, sd5, sd6, sd7, sd8, sd9, sd10, sd11, sd13, sd12, sd14, sd15, sd16, sd17, sd18, sd19, sd20, sd21, sd22, sd23, sd24, sd25, sd26, sd27, sd28, sd29, sd30, sd31, sd32, sd33, sd34, sd35, sd36, sd37, sd38, sd39, sd40, sd41, sd42, sd43, sd44, sd45, sd346, sd47, sd48, sd49, sd50.

Data should be received in csv files named “X-YYYY-MM-ZZZZZZZ-Sounder.csv” where X is the code of the buoy manufacturer (M, S, Z, for Marine Instruments, Satlink, and Zunibal, respectively), YYYY is the year, MM the month, and ZZZZZZZ the name of the fishing company. A single csv file will be pre