



**COMMISSION**  
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Rarotonga, Cook Islands (Hybrid)

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**FFA Members' Position on key issues for WCPFC20**

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**WCPFC20-2023-DP01**  
**3 November 2023**

FFA Member CCMs



**FFA**

3rd November 2023

Dr Josie Tamate  
Chair  
Western and Central Pacific Fisheries Commission  
PO Box 2356, Kolonia  
Pohnpei  
Federated States of Micronesia

Dear Chair,

## **FFA MEMBERS' POSITIONS ON KEY ISSUES FOR WCPFC20**

I write on behalf of the 17 Members of the Pacific Islands Forum Fisheries Agency to share our positions on key issues for the 20th session of the Western and Central Pacific Fisheries Commission. This is without prejudice to positions of FFA Members individually or collectively.

### **Special Requirements of Small Island Developing States**

Article 30 of the Convention on the Conservation and Management of Highly Migratory Fish Stocks in the Western and Central Pacific Ocean requires the full recognition of the special requirements of developing States, in particular Small Island Developing States and Territories (SIDS). This is a fundamental provision for FFA Members and is the cornerstone upon which the Commission is built. Article 30 is supplemented and operationalised by CMM 2013-06 (Conservation and Management Measure on the criteria for the consideration of conservation and management proposals) and CMM 2013-07 (Conservation and Management Measure on the Special Requirements of Small Island Developing States and Territories).

FFA Members reiterate the need to ensure that the special requirements of SIDS are fully recognised and effectively addressed in all Commission decisions and processes. This includes ensuring that every proposal is accompanied by a CMM 2013-06 assessment. On CMM 2013-06, FFA Members recommend that TCC include, in its standing agenda item on Special Requirements of Developing States, a review and assessment of the Commission's implementation of and compliance with CMM 2013-06 for the previous calendar year.

In the context of Article 30, we have six priorities for this Commission meeting.

#### **1. Climate Change**

FFA Members cannot over emphasise the importance of addressing climate change impacts to the region. Pacific Island Leaders have stated that climate change is the single greatest threat to the livelihoods, security and wellbeing of the peoples of the Pacific. Climate change places a great risk on the benefits to SIDS in the Pacific from our region's tuna fisheries.

FFA Members are taking concrete steps to address climate change impacts in our fisheries. In August 2023, Forum Fisheries Ministers adopted the FFA Climate Change Strategy. The Strategy serves as a platform for FFA Members to address our climate change and fisheries priorities, including within the context of the Commission.

FFA Members restate the need for the development of effective and robust harvest strategies that provide resilient frameworks to ecosystem change and encourage all WCPFC CCMs to continue to commit and engage with us, in good faith, on this work. Moreover, FFA Members will pursue the development of allocation frameworks within the Commission that take into account projected impacts of climate change and ensure that SIDs rights in these fisheries are protected.

Further, FFA Members call for stronger recognition of climate change in the work of the Commission and continue to support efforts to improve scientific robustness on the implications of climate change for the region's tuna stocks, particularly following SC19's recommendation to develop and test ecosystem and climate indicators. We urge the Commission to take the necessary actions to best implement the *2019-01 Resolution on Climate Change*, including by taking appropriate actions that increase the resilience of regional tuna stocks, raising awareness and fostering engagement and international collaborations, and seeking overall reductions in fishery-related carbon footprints in the Convention Area.

## **2. Tropical Tuna measure**

As we have underlined in the past, FFA Members support a precautionary approach to the review of CMM 2021-01 (TTM), because all three stocks are currently meeting the objectives stipulated in the measure. This measure maintains the careful balance of interests between fisheries and CCMs, which has been achieved after a lengthy period of careful and considered development.

FFA Members have actively engaged in the two TTM Review workshops for the CMM this year and we express our appreciation to you Chair for facilitating these discussions. We have made a number of suggestions with details of which can be found collated in the WCPFC Chair's Consultative Draft of a Revised TTM (Circular No. 2023/08). Our most notable proposal relating to the TTM is to restrict the total amount of purse seine effort on the high seas within the WCPFC Convention Area between 20°S and 20°N, to a maximum of 2300 days per year, which is equivalent to the purse seine high seas effort levels seen in 2012 ([Attachment A](#)). Such a limit is imperative to ensure integrity in the implementation of the Management Procedure for WCPO SKJ (CMM2022-01).

FFA Members take heed of the advice of the Scientific Committee very seriously and note with concern that recently released projections indicate that the YFT objective will not be achieved over the long term under all scenarios. This is largely due to a large and growing impact of other commercial fisheries in Region 2 (of the 2023 YFT stock assessment), particularly in Indonesia. This growing impact is a major concern for FFA Members as it risks undermining the Commission's and CCMs' efforts to ensure tropical tuna stocks remain sustainable and that tropical tuna fisheries are well-managed.

### **3. South Pacific albacore**

FFA Members seek to revise the currently untenable SPA interim Target Reference Point (iTRP) and adopt an iTRP that is where we want this fishery to be and guide and expedite the development of the SPA MP. FFA Members are looking to engage with other CCMs through the SPA Roadmap IWG.

FFA is also proposing to address the longstanding issue on the definition ‘actively fishing for’ in the South Pacific albacore Measure, CMM 2015-02 ([Attachment B](#)). We are concerned with the non-assessment of this important and sole management control in the current SPA measure.

In addition, FFA Members look forward to continuous engagement of all CCMs in this IWG to enable frank discussions and develop sound recommendations for the Commission on the management of the SPA fishery.

### **4. Compliance Monitoring Scheme**

FFA Members have continuously expressed concerns regarding the operation of the Compliance Monitoring Scheme for several years. A fundamental concern relates to the imbalance in the operation of the CMS between purse seine and longline obligations arising from the overall imbalance in the Commission’s management frameworks for these fisheries. As recognised by WCPFC19, FFA Members attach high priority to the Commission addressing this issue.

Further, FFA Members appreciate the work that the CMS IWG Chair and Leads of the Audit Points and Corrective Actions have undertaken. FFA Members see the work on Audit Points as a priority and we continue to invest significant time and effort on this work. FFA Members will send our comments on the outstanding Audit Points directly to the Audit Points Lead and the CMS IWG Chair.

On Corrective Actions, FFA Members do not see this as a priority until the Commission addresses the issue of imbalance. However, FFA Members are providing comments on the TOR. As suggested at WCPFC19, FFA Members’ view is that any development of corrective actions at this time should focus on supportive and cooperative corrective actions in order to encourage cooperation towards compliance, in accordance with the principle of cooperation towards compliance in paragraph 3 of the CMS measure. FFA Members will provide comments on the draft TOR for this work directly to the Corrective Actions Lead.

### **5. Transshipment**

FFA Members attach high priority to the review of the transshipment measure. This has been a long outstanding issue. We reiterate the importance of bringing transshipment to port, the need to enhance monitoring of any transshipment on the high seas, the need for independent review and verification of data, priority for electronic monitoring on transshipment, and improved cooperation between the WCPFC and IATTC in the overlap area. FFA Members look forward to working towards adopting a revised measure that addresses the issues raised in the Terms of Reference and Scope of Work. FFA Members thank the Co-Chairs for their work on this issue, which was received on 1 November. We will forward our comments on the draft revised measure directly to the Co-Chairs.

## 6. Labour Standards

FFA Members hold the matter of crew labour standards as a high priority and support the work towards a CMM on Labour Standards. We understand that more time could be required to ensure that it can be effectively implemented, monitored and enforced by all CCMs prior to its adoption. FFA Members seek the adoption of the measure in 2024 with the possibility of the measure taking effect at a later date to give sufficient time for CCMs to effectively implement the measure.

### Nomination of Officers

FFA Members are pleased to nominate Mr David Power (Australia) as co-Chair of the Finance and Administration Committee.

Chair, we stand ready to work with you and other CCMs to ensure that the Commission progresses conservation and management efforts at its meeting this year.

Your sincerely,



Mr Glen Joseph  
**Chair**  
**Forum Fisheries Committee**

cc: Ms. Rhea Moss-Christian, WCPFC Executive Director.