



FIFTH REGULAR SESSION

Busan, Korea

8-12 December 2008

JAPAN'S COMMENTS ON CHAIR'S DRAFT CMM ON BIGEYE TUNA

WCPFC5-2008-DP12

6 December 2008

1. General comments

First, Japan would like to express its commitment to working with other Members constructively to establish proper CMM at the coming Commission meeting. In introducing CMM for bigeye in December, however, it is essential to take due account of actual enforceability and feasibility of those CMM. Otherwise, we would face soon or later the same plight as we are experiencing in other tuna RFMOs. For instance, several developing fishing and coastal states has no ability to assess by themselves even how much they are catching in their EEZ. How can we expect their compliance with mandatory reduction of bigeye fishing effort or catch? We probably have to develop first a special program to enable them to monitor and control their fishing activities.

Japan is prepared to take necessary measures to reduce its actual bigeye catch by 10 % for the first year and additional 20% for the following two years if the SC and TCC advices are unchanged. The Japanese purse seiners land all of their catches at the Japanese ports. FAJ has been engaged for years in monitoring activities at the landing ports with its scientists and thereby is able to assess accurately and control the actual amount of bigeye bycatch by purse seiners (P/S). Observers, even if placed onboard, cannot assess amount of actual bigeye bycatch by purse seiners. Sorting and exactly measuring catch volume by species can only be made by landing site observation.

2 Consideration on varied fishing patterns

Since operational pattern of purse seiners differs by countries, effective measures for bigeye reduction differ by countries, too. One measure which is effective to reduce bigeye bycatch of certain country may not be effective to other countries and cause substantial decrease of their skipjack catches. For this reason, not only we seek a unified CMM package in the entire region but we should seek a scheme allowing

Members to have rational flexibility to decide most suitable ways to reduce its effort or catch among the options provided by the CMM.

3 FAD Closure

FAD closure proposed by Chair can be considered neither practical nor fair for the following reasons:

- Since many natural objects float in the tropical area, it is impossible to identify which is FAD fishing operation and which is not.
- While a bigeye bycatch rate differs by areas, it is in general considered high in a coastal area where juvenile fish is abundant. But in Chair's proposal, the coastal areas are exempted from FAD closure (we are not proposing inclusion of these areas but just pointing out a lack of fairness and effectiveness).
- There are bad precedents of FAD closure. The 3 month FAD closure ICCAT adopted ten years ago had neither practical effect for bigeye conservation nor record of high compliance with the closure, while IATTC abandoned this option.
- Since FAD is an important tool to make both coastal and offshore fisheries viable, FAD closure may well have a fatal impact upon those fisheries operations if it is fully implemented. This implies that full compliance with the closure is very difficult to achieve.

4. 100% Observer Boarding on P/S

The 100 % coverage is extremely expensive to implement and excessive, while it will not lead to an expected result for monitoring of the P/S fishing operations for the following reasons. The coverage should be set at an appropriate lower level.

- Observers cannot assess onboard bigeye bycatch amounts nor identify which operation is FAD fishing or not, as stated earlier.
- Observers may be able to monitor discarding of small fish. But even fishermen onboard cannot sort out small bigeye among their caught fish. The only way to get rid of bycaught bigeye is to discard all the small fish, which is very unlikely for the fishermen to do but can be found later through comparison of catch data of observer-boarded vessels and non-boarded vessels.

Instead, monitoring at the landing ports should be reinforced.

(5) Pocket High Seas Closure

Japan supports actual reduction of bigeye bycatch by P/S in both EEZ and high seas. Picking out only the pocket high seas area and closing them is neither effective enough nor balanced. Japan would rather accept overall vessel day control for both PNA EEZ and adjacent high sea areas.