



COMMISSION
NINTH REGULAR SESSION
Manila, Philippines
2-6 December 2012

ISSF POSITION STATEMENT

WCPFC9-2012-OP6
1-December-2012
0800



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Presented during the 9th Regular Session of the
Western and Central Pacific Fisheries Commission
in Manila, Philippines
3 – 7 December 2012

The **International Seafood Sustainability Foundation (ISSF)** is a global partnership among the tuna industry, science and WWF, the global conservation organization. Our mission is to work toward the science-based conservation and management of tuna stocks and the protection of ocean health by supporting regional fisheries management organizations and advocating for the recommendations of each organization's scientific advisory body.

The first part of our statement addresses three of the most important issues facing global tuna sustainability: reference points and harvest control rules, fleet capacity, and the management of FADs. The second part addresses challenges specific to the WCPFC.

GLOBAL ISSUES

Harvest Control Rules (HCRs) and Reference Points. HCRs are a set of well-defined management actions to be taken in response to changes in stock status with respect to target and limit reference points. Unless there is a pre-agreed upon action plan for avoiding overfishing or for rebuilding an overfished stock, long negotiations lead to delayed action or inaction. This delay can lead to further damage to the stock, requiring even more aggressive curtailing of fishing. The adoption of HCRs is a key aspect of modern fisheries management, and is also a requirement of several eco-label certification programs.

ISSF endorses the application of the Precautionary Approach using clear target and limit reference points and HCRs, as called for by the UN Fish Stocks Agreement and by some RFMO Conventions. While most tuna RFMOs have at least begun consideration of limit reference points through their science committees, none have fully implemented these measures. ISSF urges all tuna RFMOs to adopt stock-specific limit and target reference points and HCRs. This is one of the most important actions that RFMO members can take to ensure the long-term sustainability of tuna stocks.

*Though seven years have passed since the Convention entered into force, the WCPFC has yet to adopt any reference points in accordance with Article 6. ISSF supports the adoption of the stock-specific limit reference points recommended by SC8 and looks forward to substantial progress on target reference points and HCRs at the upcoming Management Objectives Workshop. **ISSF urges CCMs to give this matter the highest priority at WCPFC9.***

Closed Vessel Registries and Management of Fleet Capacity. Experts agree that there is overcapacity in the global tuna fleets. Fishing fleet overcapacity increases pressure to weaken management measures and eventually leads to stock overexploitation. The first step towards managing capacity is to establish limited entry via a comprehensive closed vessel registry with an eye towards ultimately reducing the number of fishing vessels to an appropriate level. The IATTC is the only tuna RFMO with a closed vessel registry, although current capacity is well in excess of resource productivity.

ISSF supports the Kobe III call for a freeze in purse seine fishing capacity by developed fishing nations and creating mechanisms to transfer capacity to developing countries with aspirations to participate in these fisheries. These steps should be taken now, since scaling back fleet capacity will become even more difficult as new vessels are introduced. To this end, ISSF urges the following actions:

- ICCAT, IOTC and WCPFC adopt closed vessel registries, especially for purse seine fleets;
- All tuna RFMOs develop capacity transfer mechanisms to allow for increased participation by developing countries without an increase in overall capacity, while ensuring effective monitoring and control of the fisheries;
- All tuna RFMOs establish rules for monitoring and managing the movement of fishing capacity among the respective Convention Areas;
- All tuna RFMOs require unique vessel identifiers (such as IMO numbers), in order to strengthen their ability to monitor fishing capacity globally through the Consolidated List of Authorized Vessels (CLAV).

Fish Aggregating Device (FAD) Management. Setting on FADs accounts for nearly 40% of global tuna catches and 50% of global skipjack catches. The time is ripe for a concerted global effort to gather and report to RFMOs data on FADs (e.g., via logbooks) in order to better monitor FAD usage and to establish a sound basis for their management in every ocean region. With this information, scientists can advise decision-makers on how to reduce catches of small tunas and bycatch of non-target species that are commonly associated with FADs. Providing science bodies with detailed data on FADs and other floating objects can also greatly improve their stock assessments. However, with the exception of data collected through observer programs, there remains a need and opportunity to improve the information about this type of fishing at the RFMO level. In addition there is a growing understanding of best practices in FAD construction and bycatch mitigation – developments that ISSF is actively promoting – that could be implemented in the short term.

As noted in CMM 2008-01's FAD Management Plan guidelines (Appendix E) and TCC5 2009-22, in order to adequately monitor FADs, there are two primary types of information that need to be collected and reported to RFMO scientific bodies: (i) an inventory and activity record of FADs ("FAD logbook": FAD markings, construction specifications, deployment, retrievals, etc.), and (ii) a record of encounters of fishing and supply vessels with the FADs ("fishing logbook": catch, by species, that results from sets made on FADs). These two types of information should be linked through the FAD ID or marking. Using this data, RFMO scientific bodies can and should advise on any necessary FAD management measures, followed by the development of effective mechanisms for implementation and compliance monitoring by fishery managers.

WCPFC CONSERVATION AND MANAGEMENT MEASURES

1. CMM 2008-01 and the Purse Seine Fishery

The analyses presented at SC8 corroborate the fact that CMM 2008-01 has been ineffective in meeting the objectives of controlling purse seine effort and ending the overfishing of the bigeye stock. The number of purse seine fishing days continues to increase, and the catch of bigeye and the number of FAD sets in 2011 were the highest on record.

The results of projections presented at SC7 and SC8 suggest that a total seasonal closure of the purse seine fishery, as compared to a FAD closure, would have only a marginal conservation gain for bigeye whereas there would be a loss in total yield. ISSF notes, however, that these analyses did not consider uncertainty in the implementation of either type of closure. ISSF is convinced that a total closure of the

purse seine fisheries (e.g., for two or three months, at a time of the year when the catch rates of bigeye are high), without exemptions, would be much easier to implement, monitor and enforce. **ISSF supports conservation measures as recommended by the WCPFC's science provider and committee, whether FAD closures or limits, or total closures, provided that the selected measures are both fully enforceable and applicable to all participants.**

Other analyses presented at SC8 suggest that additional management measures, such as limiting the number of FAD sets made each year, could be used to address the problem of bigeye overfishing. **ISSF would support a limit on the number of FAD sets as long as it can be properly monitored and enforced throughout the Convention Area.** This measure (and similar ones such as individual vessel bigeye limits) has obvious allocation implications and deserves thoughtful negotiation among the parties to ensure consistent implementation. In addition, monitoring the accumulation of FAD sets per vessel in real time could subject observers to undue pressure from fishers.

The analyses reviewed by SC7 and SC8 indicate that the exemptions in CMM 2008-01 account for about one-half of the overfishing of bigeye tuna. **ISSF urges WCPFC9 to eliminate these exemptions** and to improve bigeye data through more comprehensive reporting of catches by Indonesian and Philippine fleets, including catches from all waters and made by all vessels under their jurisdictions.

2. Sharks

SC8 concluded that the stock of **oceanic whitetip shark** is overfished and that substantial overfishing is taking place (recent fishing mortality is 6.5 times higher than F_{MSY}). The analyses for **silky sharks** were inconclusive, but SC8 recommended that fishing mortality not be allowed to increase. Since the major source of mortality for both of these stocks is from non-target fisheries, SC8 concluded that bycatch mitigation measures are the best tool for addressing the conservation of these two vulnerable species. To augment WCPFC8's decision regarding the prohibition on oceanic whitetips, **ISSF urges CCMs to consider more robust bycatch mitigation measures, improved data collection and reporting, and the development of stock-specific reference points.**

ISSF urges the Commission to take further steps to enforce the existing conservation and management measure addressing shark finning, and move to the total prohibition of the at-sea removal of shark fins and mandate that fins remain naturally attached for all sharks landed. ISSF is also asking all RFMOs, including the WCPFC, to **adopt a prohibition on deliberate purse seine setting around whale sharks.** As this prohibition is already a requirement for those vessels fishing in PNA waters, expanding the measure to other waters in the Convention Area is a natural next step. It was understood at WCPFC8 that a finalized measure would be approved at WCPFC9, and ISSF looks forward to its adoption.

3. Longlining

ISSF notes with concern the continuing increase in the number of longline vessels operating in the WCPFC Convention Area, the low levels of observer coverage, continuing transshipments at sea, and activity in the High Seas beyond coastal State control. **ISSF urges WCPFC9 to impose and enforce, as a precautionary measure, measures to limit longliner capacity in the Convention Area.** **ISSF further urges the Commission to task its scientific body to make recommendations to WCPFC10 regarding the levels of longline capacity consistent with sustainable exploitation and prudent management of target tuna stocks.**

For further information please visit <http://www.ISS-FOUNDATION.org>