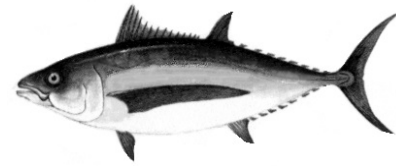


WESTERN FISHBOAT OWNERS ASSOCIATION©



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November 30, 2010

Western and Central Pacific Fisheries Commission
PO Box 2356
Kolonias - Pohnpei, 96941
Federated States of Micronesia
Via E-Mail: wcpfc@wcpfc.int

Re: WCPFC Consideration of IUU and BRP's issues

Dear Commission Members:

On behalf of the Western Fishboat Owners Association (WFOA) I am writing to request the Commission to consider two items of importance to North American albacore fishermen. A growing concern in our fisheries is evidence of growing IUU fishery that has potential to impair albacore production. The second item is the need to establishing the biological reference points being developed by the International Scientific Committee's Albacore Working Group.

At WFOA meetings and on phone conversations my members bring up evidence of continuing IUU fishing along the North Pacific Transition Zone. I would like to point out some of the IUU related observations that are coming to light in recent years. North American trollers have observed illegal high seas gill net operations on several occasions and have notified authorities of the incidences. This occurred this summer when U.S. vessels notified authorities in Hawaii that resulted in an aircraft being sent to the sighting area, but the response was delayed due to communication problems, so the aircraft arrived on scene too late to locate any vessels. I have photos on file of IUU vessels operating gillnets in the transition zone in 14 -16 C surface temperature, the preferred temperature of albacore. The photos were taken by an albacore troll vessel engaged in trolling and catching albacore when it came upon the IUU vessel.

The growing number of gillnet marked albacore is of great concern. Some of our fishermen that spend a great deal of time in the central Pacific estimate that 15% of the fish exhibit gillnet marks. This suggests that the IUU take of albacore could be quite high, since the 15% represent only fish that have escaped. One fisherman reported finding a long panel of gillnet gear in the region of 43N - 145W that was new and did not have any fouling or discoloration. Reports from beach cleanup operations in Alaska show remnants of high seas drift gillnets come ashore in many locations in the Gulf of Alaska, another indication of potentially high IUU effort in the North Pacific Ocean.

We note that the severe downturn in albacore abundance experienced in the late 1980s coincide with

the development of the high seas driftnet fishery. Catches fell off steadily from about 1986, reaching a low in 1991 when U.S. landed only 1,900 tons. After an international prohibition of large high seas nets the fishery recovered quickly to average levels by 1996. WFOA members are very concerned about illegal high seas fishing and the effect the on albacore's sustainability. On behalf of my members I request that the WCPFC and IATTC continue to work toward ending IUU fishing in the North Pacific Ocean. Further, I urge the WCPFC, IATTC, and coastal states to work together to develop an effective IUU monitoring and enforcement system. WFOA and other North American fishermen feel strongly that it is futile to try to establish an effective management regime while a potentially significant portion of the catch is unaccounted for. WFOA stands ready to assist through at-sea observation of vessel activity and reporting of IUU gear.

Our second item of concern is the adoption of biological reference points for North Pacific fisheries. WFOA recently received Marine Steward Council (MSC) certification for albacore landed by all U.S. troll and baitboat fishermen in the North Pacific. Under the conditions of certification WFOA is required to communicate the need for regional fisheries management organizations to develop biological reference points to monitor the state of the harvest relative to stock status. WFOA supports the development of reference points to insure the long term sustainability of the resource on which our fishermen depend for their livelihood and recognizes the progress made by the ISC Albacore Working Group that has been actively engaged in developing a framework of recommendations.

At a meeting of the working group in Shimizu Japan in April of 2009 the subject of biological reference points was discussed extensively and recommendations and requests for guidance were sent to the ISC and the Northern Committee. The Northern Committee (NC) of the Western and Central Pacific Fisheries Commission (WCPFC) at its sixth regular session in September 2010 confirmed that the interim management objective for North Pacific albacore is to maintain the spawning stock biomass (SSB) above the average level of its 10 historically lowest points (ATHL). The fishing mortality rate that would likely cause SSB to fall below this level with a probability greater than 50% is referred to as the interim reference point (IRP).

At a recent, October, 2010, meeting the group discussed the ISC Chair's request for species specific reference points and noted that an interim objective to maintain the spawning stock biomass (SSB) above the average level of its ten historically lowest points (ATHL) with a probability greater than 50% has been established for north Pacific albacore and that the associated F-based reference point, FSSB-ATHL, will be estimated in future stock assessments. The FSSB reference point concept was proposed to the WG in 2005 to ensure that SSB in future years remains within the range of the historically 'observed' SSB that supported productive, large-scale fisheries in the North Pacific for many years.

The Albacore Working Group has developed a framework model for evaluating various approaches that may be a useful tools for eliciting feedback from the Northern Committee that the Working Group needs in order to make further progress on reference points, namely the SSB threshold, the level of certainty required (50% vs. 95%), and the projection period that should be used. It is likely that approached proposed by the Working Group will be approved and if the requested feedback is provided then it is likely that BRPs will be available for determining appropriate harvest levels when the next stock assessment is produced. The Working Group discussed other reference points, particularly for presenting F relative to MSY-based reference points, but there was no consensus on how or what to

choose.

WFOA believes the Albacore Working Group is moving forward toward a consensus BRP. It is commonly agreed that the minimum biomass is not as good a reference point as an MSY based reference point. WFOA encourages the further development of an MSY based reference point, and urges the WCPFC to request member nations to invest in collecting the biological data that the working group requires to develop robust biological reference points needed to maintain the sustainability of the Pacific albacore resource.

Thank you for the opportunity to comment on these two very important issues.

Sincerely,



Wayne Heikkila
Executive Director

CC: Guillermo A. Compean, Director - IATTC
Brian Hallman, Deputy Director - IATTC
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Kitty Simonds, Executive Director - WPFMC
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