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ISSF POSITION STATEMENT TO WCPFC10

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ISSF POSITION STATEMENT

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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.

In 2012, the WCPFC adopted limit reference points for skipjack, bigeye, yellowfin and South Pacific albacore. This was an important first step. Now the WCPFC needs to adopt target reference points for these same stocks. ISSF supports the adoption of the stock-specific target reference points and the recommendations by SC9 regarding calculating uncertainty. ISSF looks forward to substantial progress on target reference points and HCRs at the upcoming Second Management Objectives Workshop. ISSF urges CCMs to give this matter the highest priority at WCPFC10.

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:

- 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).

ISSF supports the proposal made by the United States at TCC9 (WCPFC-TCC9-2013.DP03) to make an IMO number mandatory for purse-seine vessels that are steel-hulled and 100 GT or 100 GRT by January 1, 2015. ISSF urges CCMs to adopt a requirement for IMO numbers at WCPFC10 and encourages the Commission to include the development of a purse-seine capacity transfer mechanism in its workplan for 2015.

Fish Aggregating Device (FAD) Management.

Setting on FADs accounts for nearly 40% of global tuna catches and 50% of global skipjack catches. FADs are one of the most important fishing methods for tropical tunas. Surprisingly, however, there are huge gaps in all RFMOs regarding the number of FADs being used and on details of fishing operations on individual FADs. Observer programs can be used to collect much -- but not all-- of the information needed to appropriately monitor FADs. Vessel operators can complement this information as well as provide additional information on individual FADs. Collection and reporting of data that can be used to measure fishing effort by FADs is simply a must.

The WCPFC has adopted Minimum Standard Data Fields for observers that contain much of this information. However, these data are not being collected consistently as a matter of priority. Further, there are some types of information that an observer is unlikely or unable to collect, such as FAD markings or other identifiers that would enable one to assess if a FAD is being reutilized or being set on or deployed for the first time, or details on the FAD design (size, depth, materials). This is the type of information that vessel captains can easily collect, but observers cannot do so routinely.

ISSF urges the WCPFC to take two actions this year: (1) ensure that the regional observer program routinely collects the FAD data in the WCPFC Minimum Standard Fields and (2) expand the information required from vessels to include data on FAD deployments, designs, equipment and identification marks.

As noted by the SC9, it would be easiest to achieve the latter together with the development of electronic logsheets, so as to avoid requiring captains to fill out a duplicate form. The IOTC and IATTC adopted expanded FAD data collection measures at their annual meetings this year. **Therefore, ISSF is pleased to see that the United States has tabled a proposal on FAD data collection and urges the WCPFC to adopt such a measure this year.**

WCPFC CONSERVATION AND MANAGEMENT MEASURES

1. CMM 2012-01, the Purse Seine Fishery and bigeye tuna

The analyses presented at SC9 corroborate the fact that CMM 2012-01 has been ineffective in meeting the objectives of controlling total purse seine effort and ending the overfishing of the bigeye stock. The number of purse seine fishing days continues to increase, the catch of bigeye and the number of FAD sets continues to increase over the 2007-2011 average, and the number of FAD sets per day is increasing.

Analyses considered by SC8 and SC9 indicate that all of the following can reduce bigeye overfishing:

- Additional management measures to limit FAD activities (such as extending the FAD closure period, limiting the number of FAD sets made each year or the number of FADs that each vessel uses);
- Reducing or eliminating the exemptions in CMM 2008-01 (which account for 50% of the bigeye overfishing);
- Simultaneously considering fishing effort limits for the purse seine fishery and bigeye catch limits for the longline fishery.

ISSF urges the WCPFC to amend CMM-2012-01 in a comprehensive manner, addressing the above elements and/or utilizing other science based measures that meet the objective of ending the overfishing of the bigeye stock.

2. Sharks

SC9 concluded that the stocks of **oceanic whitetip and silky sharks** are overfished and that overfishing is occurring, or highly likely to be occurring, on both species. It is clear from these stock assessments that catches and mortalities of these shark stocks must be urgently reduced. SC9 recommended that the Commission consider measures directed at bycatch mitigation as well as measures directed at targeted catch, such as from shark lines, to improve the status of the silky shark population.

ISSF urges CCMs to adopt comprehensive and robust shark conservation and management measures, including bycatch mitigation measures, improved data collection and reporting, and the development of stock-specific reference points. ISSF further 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.

3. Longlining and Transshipment

ISSF notes with concern the continuing increase in the number of longline vessels operating in the WCPFC Convention Area, the significant increase in catches of albacore in the South Pacific by longline vessels, the low levels of observer coverage (data indicates that coverage rates may be less than the required 5%), increasing numbers of transshipments at sea beyond flag State control, and the failure of some CCMs to provide the required transshipment reports or advance notifications as required by CMM 2009-06. ISSF notes that electronic monitoring systems are being tested and developed which could potentially be used to address some of these problems.

ISSF urges WCPFC10 to impose and enforce, as a precautionary measure, measures to limit longliner capacity in the Convention Area. ISSF also urges the Commission to task its scientific body to make recommendations to WCPFC11 regarding the levels of longline capacity consistent with sustainable exploitation and prudent management of target tuna stocks. ISSF further urges the Commission to amend its transshipment measure (CMM 2009-06) in order to address these significant gaps in its effectiveness which affect traceability of the products and could result in IUU fishing.

4. Compliance and Data Gaps

ISSF notes with concern the SC9 information on data gaps, including annual catch estimates by EEZ, the number of vessels in aggregate data for some fleets, shark catches, and operational catch/effort data from certain fleets. These data are necessary for robust stock assessments, and provision of these data is a fundamental obligation of CCMs. **ISSF urges all CCMs to provide these data to the SPC by the agreed deadlines and in the correct formats. ISSF further urges the Commission to consider appropriate responses to promote compliance by those CCMs who have not yet provided operational catch and effort data.**

On the broader issue of compliance monitoring, ISSF continues to be concerned with the lack of transparency in the WCPFC Compliance Monitoring Scheme (CMS). In contrast to the other four tuna RFMOs, observers are not allowed in the CMS working group meetings and no detailed information on the levels of compliance by member, or the responses of members to identified non-compliance are released publically. Member reports on the implementation of WCPFC measures, known as *Part II reports*, are also confidential. **ISSF urges the Commission to reform its CMS process so that accredited observers may attend its meetings and its reports contain detailed information on the level of compliance by CCM and how they plan to address the areas of identified non-compliance. ISSF also supports the development of a scheme of responses to non-compliance by the Commission as soon as possible.**

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