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**ISSF POSITION STATEMENT**

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**WCPFC11-2014-OP01**  
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**Paper by International Seafood Sustainability Foundation (ISSF)**



## ISSF POSITION STATEMENT

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- **CMM 2013-01, bigeye and skipjack tuna.** The analyses presented at SC10 corroborate the fact that CMMs adopted by WCPFC to end the overfishing of bigeye have been ineffective. Overfishing continues and the stock is now below the Limit Reference Point adopted by the Commission. The purse seine fishery continues to increase, with record catches in 2013, when the bigeye catch by this gear was clearly the highest ever. In addition, the longline fishery has a similar impact on the reproductive capacity of the stock as the purse seine fishery does. Overall, fishing mortality on the stock needs to be reduced by 36% in order to end overfishing.

CMM-2013-01 is overly complex and has too many exemptions and optional clauses, which render it ineffective and difficult to enforce. The WCPFC could consider adding other incremental measures to the CMM (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), but this is what has been done since 2009 and it is clearly not effective. **ISSF urges the WCPFC to eliminate the exemptions in the CMM and to adopt management measures that are effective and easier to enforce, such as a total fishery closure (potentially with two closure periods) or a reduction in fishing effort, to meet the objective of ending the overfishing of the bigeye stock.**

Regarding **skipjack** tuna, the stock is within the range of the candidate Target Reference Points (TRP) being considered by WCPFC and SC10 recommended that fishing mortality on the stock not be allowed to increase from its current level. ISSF urges WCPFC to limit fishing effort (fishing days) in the purse seine fishery to a lower level that will maintain skipjack within the range of candidate TRPs and significantly reduce the catch of bigeye.

- **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. 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.

***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 harvest strategies, including target reference points and harvest control rules for these same stocks. ISSF looks forward to substantial progress on adoption of target reference points and HCRs for skipjack at WCPFC11 through the adoption of the proposed work plan for the development and implementation of target reference points and HCRs.***

- **Compliance and Data Gaps.** ISSF notes with concern the SC10 information about the lack of operational data for longline fleets in the high seas, which affected the quality of the bigeye

assessment reported at SC10. **ISSF strongly urges all CCMs to meet their obligations regarding data submissions and provide these operational 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.**

While there were important strides in 2013, 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 the responses of members to identified non-compliance are not released publically. Member reports on the implementation of WCPFC measures, known as *Part II reports*, are also confidential. **ISSF urges the Commission to endorse TCC10's recommendation to amend CMM 2013-02 to reform its CMS process so that accredited observers may attend the working group meetings and information on how CCM's respond to and plan to address the areas of identified non-compliance be made public. ISSF also supports the development of a scheme of responses to non-compliance by the Commission as soon as possible.**

- **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. However, there are huge gaps in all T-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, as shown in WCPFC-SC10-2014/ST-IP-09. The WCPFC has adopted Minimum Standard Data Fields for observers that contain much of this information. However, there are some types of information that an observer is unlikely or unable to collect, such as FAD markings or details on the FAD design. This is 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.**

**ISSF strongly supports the SC10 and TCC10 recommendations for the creation of a Working Group on FAD management. ISSF urges the Working Group to adopt Terms of Reference that address (i) FAD marking, and identification, and use of electronic signatures; and, (ii) FAD monitoring, tracking and control.**

- **Transparency in Access, Joint Venture and Chartering Arrangements.** ISSF recognizes the importance of access and chartering or joint venture arrangements to the development aspirations of developing States, in particular small island developing States. It is also equally important for accurate stock assessments and effective compliance and enforcement that there is clarity regarding catch attribution and the responsible party for MCS regarding vessels under chartering or access arrangements. **ISSF urges the WCPFC to adopt measures to promote transparency in access agreements and chartering or joint venture arrangements that are similar to existing IOTC and ICCAT measures.**
- **Sharks.** SC10 recommended that WCPFC11 consider a number of longline shark **mitigation methods (WCPFC-SC10-EB-WP-01)**. ISSF notes that shark lines are used in many fisheries and these catch mostly silky and oceanic whitetip sharks. Since the retention of these species is

prohibited, *ISSF urges WCPFC to prohibit the use of shark lines in order to improve compliance.*

*ISSF is encouraged that FFA, USA and the EU are seeking the adoption of a comprehensive and robust shark conservation and management measures that includes the removal of the 5% fin-to-weight ratio, which was highlighted at TCC10 as being an area of non-compliance. ISSF supports amending CMM 2010-07 to mandate that fins remain naturally attached for all sharks landed. Moreover, the CMM should include the implementation of a range of proven shark catch mitigation measures, improved data collection and reporting, and the development of stock-specific reference points..*

- **Longlining and Transshipment.** ISSF notes with concern the low levels of observer coverage (data indicates that coverage rates may be less than the required 5%) and the failure of some CCMs to provide the required transshipment reports or advance notifications. ISSF notes that electronic monitoring systems are being tested and developed which could potentially be used to address some of these problems.

*ISSF urges WCPFC11 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 WCPFC12 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.*

- **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.

**ISSF continues to be concerned with the growth of fishing capacity in the WCPO region, which has not been curtailed through the provisions adopted in CMM 2013-01. To underscore this importance of this issue, in October ISSF clarified its [Resolution to Limit the Growth in Fishing Capacity of the Global Large-Scale Tropical Tuna Purse Seine Fleet](#). Through this Resolution, ISSF Participating Companies must refrain from transactions in skipjack, bigeye and yellowfin tuna caught by large scale<sup>1</sup> purse seine vessels that are not actively fishing for tuna, or under contract for construction, as of December 31, 2012 or a replacement for an existing vessel.**

*ISSF urges the WCPFC to establish limited entry through closed vessel registries and to develop a common currency to measure fishing capacity, such as cubic meters of well volume. ISSF also supports the Kobe III call for creating mechanisms to transfer capacity to developing countries.*

*These steps should be taken now, since scaling back purse seine fleet capacity will become even more difficult as new vessels are introduced.*

*Given the importance of a mechanism to transfer capacity to developing countries to any regional capacity management scheme, ISSF hosted a Workshop in March 2014 to start a*

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<sup>1</sup> For the purpose of this resolution, large-scale purse seine vessels are those at least 335 m<sup>3</sup> fish hold volume.

*dialogue on this issue. ISSF hopes this Workshop and dialog will contribute to progressing capacity management in the tuna RFMOs. The workshop report can be accessed here:*  
<http://iss-foundation.org/resources/downloads/?did=522>