



TWELFTH REGULAR SESSION
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**VIEWS ON STRENGTHENING OF CMM 2014-01 FOR BIGEYE, YELLOWFIN AND
SKIPJACK TUNA**

WCPFC12-2015-DP07
31 October 2015

Paper by FFA Members



31 October 2015

Feleti P. Teo OBE
Executive Director
Western and Central Pacific Fisheries Commission
PO Box 2356, Kolonia
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Dear Feleti,

Strengthening of Conservation and Management Measure 2014-01 for bigeye, yellowfin and skipjack tuna

I write on behalf of the 17 members of the Forum Fisheries Agency in my capacity as the Chair of the Forum Fisheries Committee to provide comments on CMM 2014-01.

1. General comments

FFA Members have reviewed the advice from the Scientific Committee on the status of the key tropical tuna stocks, the information available from the Technical and Compliance Committee on the pattern of compliance with elements of the previous tropical tuna CMMs, and the preliminary analysis made by SPC evaluating the performance of the latest measure and its potential to achieve its objective for the bigeye tuna stock. We are pleased to provide the following comments on issues relating to CMM 2014-01.

The SPC preliminary evaluation of the potential effect of the measure in promoting the recovery of the bigeye tuna stock reveals problems of particular concern to us. The two most likely scenarios suggest that the measure is not on track to achieve its objective of reducing bigeye fishing mortality to F_{MSY} through a step by step approach through 2017. Even under the most optimistic scenario this might not be achieved until more than a decade later.

Although it is not an explicit objective in the CMM, we do note that the measure will contribute to the eventual restoration of bigeye spawning biomass above the Limit Reference Point of $20\%SB_{F=0}$.

We are mindful that the progression of actions under the tropical tuna measure ends in 2017, and that provisions will need to be made beyond that date. We urge Commission members to increase the rate of progress towards a comprehensive Harvest Strategy framework that will remove some of the complexity from this measure and reduce the opportunities for evasion of responsibility, as well as assisting to remove or mitigate the disproportionate burden of conservation action that is currently falling upon small island developing States.

2. Enhancing FAD Management Options

FFA members are particularly concerned with the impact of flag-based choices in the FAD Management section of the CMM. For 2015 (as with 2014), flag States had the ability to choose between either a 4 month FAD closure, or a 3 month FAD closure coupled with a limit on FAD sets that applies throughout the year. This ability to choose creates a definite weakness in the measure, in that it stands to reason that as restrictions get tighter, CCMs will of course choose the option best for them. As demonstrated by SPC this allows a potentially significant number of FAD sets to be used each year, which contributes to the unlikelihood that the measure will succeed.

FFA members note that there was a similar choice in the longline measures, where CCMs chose between different baselines (2001-04 or 2004). That caused similar weakness, so this is by no means a new issue.

FFA members have always noted that flag based limits are inappropriate because they come with necessary SIDS exemptions, and especially in this case where there are zone based overall effort limits, which mean that declining fleets (through relocation or reflagging) can comply with their flag limits without any management action. In the meantime though, overall effort remains constant through the VDS meaning little or no actual reduction in FAD use.

FFA members remain committed to developing alternative measures, such as FAD charging, but in the meantime, **we recommend that this issue of flag State choice be discussed at WCPFC12.**

3. High Seas FAD Closure

FFA members are highly supportive of the high seas FAD closure and are pleased to see SPC's preliminary assessment that it will have a large impact on reducing overfishing. However, FFA members note that for it to be effective, **any flag based FAD limits will need to be further reduced in 2017 to ensure that FAD sets are not simply transferred from the high seas to EEZs.**

4. PNA proposal

FFA Members have reviewed the package of proposal that the Parties to the Nauru Agreement have submitted for consideration. We believe the PNA proposal provides an excellent platform for improving CMM 2014-01 in a way that provides greater likelihood of achieving its objectives, while taking into account some of the key provisions of the Convention, including Article 30. As such, all **FFA members request that CCMs give due consideration to these issues with a view to enhancing the measure in Bali.**

5. Other comments

Several of the components of the CMM are becoming broader in scope than the Tropical Tuna CMM itself, and the Commission will need to consider how these might better be integrated into the wider work of the Commission, including through the strategic plan. This includes issues such as the management of capacity, and a more strategic approach to high seas management.

We note that while the Commission has adopted and resourced a specific Shark Research Plan, there is currently no strategic research plan for target species, and this needs to be developed. In particular, each new stock assessment highlights research and information needs, and the Commission needs a far more strategic approach to considering those needs and implementing projects and plans to meet them.

FFA members note with great appreciation the improvements in submission of operational level catch and effort data by Korea in respect of its longline and purse seine fisheries and China in respect of its longline fishery; we view progress so far as very positive and beneficial. We call on other CCMs to move away from informal arrangements to provide operational level data directly to the Commission as per the agreed rules.

We look forward to constructive and productive dialogue at WCPFC12 and would welcome any inquiries on the issues raised above (wez.norris@ffa.int and tim.adams@ffa.int).

Yours Sincerely

A handwritten signature in blue ink, appearing to read 'S. Finikaso', with a long horizontal flourish extending to the right.

Samasoni Finikaso
Chair
Forum Fisheries Committee