



31 October 2015

Feleti P. Teo OBE
Executive Director
Western and Central Pacific Fisheries Commission
PO Box 2356, Kolonia
Federated States of Micronesia

Dear Feleti,

Proposal for Establishing a Target Reference Point for South Pacific Albacore

I write on behalf of the 17 members of the Forum Fisheries Agency in my capacity as the Chair of the Forum Fisheries Committee. I am pleased to present a draft conservation and management measure that will:

- Formalise the Limit Reference Point for this stock that has already been adopted by the Commission;
- Establish an associated acceptable risk level for breaching this LRP as required for the development of harvest strategies; and
- Establish a Target Reference Point for the stock that reflects management objectives.

1. General comments

FFA Members have reviewed the new stock assessment for south Pacific albacore in detail and hold a number of concerns about the implications of that assessment on the future management of the fishery. In particular, the changes to growth and natural mortality now show a stock that is far more vulnerable to fishing pressure than was ever thought before. We note with great concern the SPC projections that continued fishing at current levels not only will cause substantial declines in vulnerable biomass and catch rates, but it stands a very high chance (20%) of causing the agreed LRP to be breached.

Urgent management reform to reduce catch and effort in the fishery is required to address this problem.

2. Risk Level Associated with the LRP

The agreed LRP for this stock is based on avoiding recruitment failure, which is appropriate. However, we also note that it is far below the current state of spawning biomass, and that if the stock did approach that level, the longline fishery would be completely unviable for all fleets.

As such, FFA members advocate a very low risk level of breaching the LRP in accordance with the guidelines in Annex II of the UNFSA and to ensure that WCPFC management measures keep the stock well above the LRP. The proposed CMM establishes a risk level of 5%, which has been advocated by FFA members before.

3. Target Reference Point

The proposed CMM establishes an interim Target Reference Point of 45% $SB_{F=0}$. While this is only slightly above the estimated current spawning biomass (41% $SB_{F=0}$), FFA members note with concern that the assessment and projection results suggest that very large reductions in catch and effort will be required to achieve it.

FFA members recommend this TRP based on the estimated changes that it will bring to catch rates, which we view as the primary driver of profitability and economic viability in the fishery. The proposed TRP should bring about a CPUE increase in the order of 15% from 2013 levels, which we see as essential to restoring profitability to all fleets in the fishery and will contribute to our ongoing development. In comparative terms, a 45% TRP will return the stock to the condition it was in during 2007-2008, which was immediately before the noted expansion in catch and effort in some fleets and zones, and just prior to the first significant alarms were raised by industry about declining economic conditions.

4. CMM 2013-06

We have attached responses to the questions posed under the CMM on Disproportionate Burden. CCMS will note that we hold very serious concerns about the magnitude of catch and effort reductions that are required in this fishery, and the undeniable development impacts that this will have on us. However, we do note that this appears to be an unavoidable situation, and such cuts are needed to maintain a fishery at any level. FFA members note that issues of the allocation of reductions and potential distribution of conservation burden as a result will need to be very carefully considered by the Commission in the design of future management measures. Otherwise, given our reliance on the stock, the Commission will risk transferring a disproportionate burden to SIDS. However, we do draw a distinction between the agreement on a TRP, and the design of measures to achieve that TRP.

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

Yours Sincerely



Samasoni Finikaso
Chair
Forum Fisheries Committee

Conservation and Management Measure on Reference Points for south Pacific Albacore

The Western and Central Pacific Fisheries Commission (WCPFC):

Recalling that the objective of the Convention on the Conservation and Management of Highly Migratory Fish Stocks in the Western and Central Pacific Ocean (the Convention) is to ensure through effective management, the long-term conservation and sustainable use of ~~the~~ highly migratory fish stocks of the Western and Central Pacific Ocean in accordance with the ~~1982 Convention~~ [United Nations Convention on the Law of the Sea](#) and the Agreement [for the Implementation of the Provisions of the United Nations Convention on the Law of the Sea of 10 December 1982 relating to the Conservation and Management of Straddling Fish Stocks and Highly Migratory Fish Stocks \(UNFSA\)](#);

Recalling that Annex II of ~~the Agreement for the Implementation of the Provisions of the United Nations Convention on the Law of the Sea of December 1982 relating to the Conservation and Management of Straddling Fish Stocks and Highly Migratory Fish Stocks (UNFSA)~~ sets out guidelines for the application of precautionary reference points in conservation and management of straddling fish stocks and highly migratory fish stocks

Recalling also that in article 5 (c) of the Convention, members of the Commission have committed to apply the precautionary approach in accordance with the Convention and all relevant internationally agreed standards and recommended practices and procedures,

Further recalling that Article 6.1 (a) requires members of the Commission in their application of the precautionary approach to apply the guidelines set out in Annex II of ~~the Agreement~~ [UNFSA](#) and determine, on the basis of the best scientific information available, stock-specific reference points and the action to be taken if they are exceeded;

Noting that the Commission has adopted a Conservation and Management Measure on Establishing a Harvest Strategy for Key Fisheries and Stocks in The Western and Central Pacific Ocean;

Desiring to make progress on the development of a harvest strategy for fisheries for WCPO south Pacific albacore tuna through the adoption of a Target Reference Point for this stock;

Mindful that many CCMs that are small island developing States intend to develop fisheries for south Pacific albacore in their EEZs;

Adopts, in accordance with Article 10 of the Convention, the following conservation and management measure on a target reference point for south Pacific albacore.

1. The Limit Reference Point for the south Pacific Albacore stock shall be 20% of the estimated recent average spawning biomass in the absence of fishing, $(SB_{F=0,t1-t2})$ ¹.
2. The target reference point for the south Pacific albacore stock shall initially be 45% of the estimated recent average spawning biomass in the absence of fishing, $(SB_{F=0,t1-t2})$.

¹ As agreed by WCPFC at its Ninth Annual Session (paragraph 269 of the WCPFC9 meeting record)

3. The Commission shall amend or develop appropriate conservation and management measures, with the objective of maintaining the south Pacific albacore stock spawning biomass at the target reference point level on average and ensuring that the risk of breaching the limit reference point, is not more than 5%.
4. This target reference point shall be an interim target reference point until it is reviewed in accordance with paragraph ~~8~~ below.
5. The method to be used in estimating the recent average spawning biomass in the absence of fishing shall be the same as that adopted by the Commission for the limit reference point, which is:
 - a) The time window shall have a length of ten years and be based on the last ten years used in the most recent south Pacific albacore stock assessment, i.e. $t_1 = y_{last-10}$ to $t_2 = y_{last-1}$ where y_{last} is the last year covered by the assessment; and
 - ~~6~~b) 6 The estimation shall be based on the most recent south Pacific albacore stock assessment model estimates of recruitment that have been adjusted to reflect conditions without fishing according to the stock recruitment relationship.
- ~~7~~6. The Scientific Committee shall refer to the limit and target reference points in its assessment of the status of the WCPO south Pacific albacore tuna stock and in reporting to the Commission on management advice and implications for this stock.
- ~~8~~7. The Commission shall use the target reference point in the formulation of harvest control rules and a harvest strategy for fisheries targeting WCPO south Pacific albacore in accordance with CMM 2014-06. The harvest control rule shall be designed such that the management control to be implemented would result in the biomass-based target reference point being achieved on average in the long term, taking account of uncertainty.
- ~~9~~8. The target reference point may be reviewed by the Commission any time relevant new information is made available, such as any time a new stock assessment is prepared, and no later than 2019. The Commission shall pay particular attention to any future recommendations of the Scientific Committee relating to the target reference point.

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Application of CMM 2013-06

The following information is offered to assist the Commission to meet the requirements of CMM 2013-06 in respect of this draft CMM.

a. Who is required to implement the proposal?

All CCMs will be required to implement this proposal in their cooperation to establish a harvest strategy for WCPO south Pacific albacore tuna.

b. Which CCMs would this proposal impact and in what way(s) and what proportion?

Achieving the TRP, and for that matter, even avoiding the LRP with sufficiently low risk requires substantial reductions in catch and effort, which can be achieved over time, but undoubtedly comes at cost to a number of stakeholders. This proposal will therefore have an impact on all CCMs involved in fisheries for WCPO south Pacific albacore tuna, and all CCMs participating in the Commission's cooperative effort to establish a harvest strategy for south Pacific albacore tuna.

At the CCM level, the impact will be greatest on SIDS in whose waters fishing for south Pacific albacore tuna largely takes place, and especially those who are substantially dependent on fisheries targeting south Pacific albacore for their sustainable development. There are also several SIDS that have not yet developed fisheries for south Pacific albacore, but do have intentions to take up the opportunities afforded to them to do so under the UNCLOS, UNFSA and the WCPFC Convention. The impact on SIDS will depend on how the Commission applies the TRP, noting the importance of the Commission giving full recognition to the special requirements of SIDS, in the application of the TRP.

Implementation of the proposal will have impacts on fleets catch south Pacific Albacore, including the domestic fleets of SIDS. In the short term, catch and effort reductions will come at cost, but in the long term, pursuing the TRP will rebuild profitability in the fishery that has been destroyed through lack of regulation on expanding catch in recent years.

c. Are there linkages with other proposals or instruments in other regional fisheries management organizations or international organizations that reduce the burden of implementation?

Yes, the Participants to the Tokelau Arrangement have established EEZ based catch limits for south Pacific albacore and are in the process of developing a formal Catch Management Scheme, which will include recognition of reference points and harvest control roles in the setting of total catch levels.

d. Does the proposal affect development opportunities for SIDS?

Yes. As described above, catch and effort reductions will have development implications for SIDS - both positive and negative. The proposal will contribute to effective management and conservation of the WCPO south Pacific albacore tuna stock. Achieving the TRP will restore catch rates and profitability for fishing vessels, which contributes to development opportunities by ensuring a valuable fishery.

In the short term though, catch and effort reductions, depending on how they are allocated will set development back for SIDS.

e. Does the proposal affect SIDS domestic access to resources and development aspirations?

Yes, as described above.

f. What resources, including financial and human capacity, are needed by SIDS to implement the proposal?

SIDS will need assistance in the further development and application of the precautionary approach to the conservation and management of WCPO south Pacific albacore tuna, including the application of the TRP that is adopted. This is a recognised priority, with assistance already being provided by the SPC, FFA, the PNAO and the WCPFC, through a range of workshops and technical advisory activities, including the WCPFC Management Objectives Workshops, supported also by Australia, New Zealand, GEF, Pew, WWF and the World Bank. Work in this area will need to continue to be recognised as a priority.

g. What mitigation measures are included in the proposal?

Not applicable to this specific measure. However, as noted above, the development of management measures to achieve the TRP and avoid the LRP will require reductions in catch and effort. Given the distribution of catch and effort, and the high reliance of SIDS, there is very high potential for such reductions to impose a disproportionate burden to SIDS. The Commission will therefore need to conduct detailed analysis and negotiation in the formulation of those measures, including the identification of specific mitigation measures for SIDS.

h. What assistance mechanisms and associated timeframe, including training and financial support, are included in the proposal to avoid a disproportionate burden on SIDS?

Current and projected programmes of assistance are expected to meet the needs for training and technical assistance, provided the current priority is maintained.