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**ISSF POSITION STATEMENT**

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**Paper by International Seafood Sustainability Foundation (ISSF)**



## **ISSF POSITION STATEMENT**

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**CMM 2015-01, bigeye and skipjack tuna.** No new assessment of bigeye tuna was conducted in 2016. The 2015 catches were 16% lower than in 2014. However, short-term projections reviewed by SC12 indicate that the bigeye stock remains in an overfished state. Overall, fishing mortality on the stock needs to be reduced by about 36% in order to end overfishing. CMM-2015-01 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 or a reduction in fishing effort, to meet the objective of ending the overfishing of the bigeye stock.***

Regarding **skipjack** tuna, the 2016 reference case assessment shows that the stock is around the interim Target Reference Point (TRP) adopted by WCPFC. However, without an effective means for limiting fishing capacity, fishing effort could increase in the near future. **ISSF urges the WCPFC:**

- ***To limit fishing effort (fishing days) in the purse seine fishery to a level that will maintain skipjack around the Target Reference Point.***
- ***Fully fund the SC12 request for a skipjack tagging program, which is essential to ensuring the next stock assessment is robust and uncertainties are minimized.***

**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. The WCPFC has made important progress adopting limit and target reference points for skipjack, and limit reference points for bigeye, yellowfin and South Pacific albacore, as well as a work plan to establish Harvest Strategies for key fisheries and stocks.

- ***ISSF urges the Commission to adhere to the 2015 harvest strategy work plan and take the decisions necessary this year (e.g., a rebuilding time frame for bigeye, management objectives for albacore, and acceptable levels of risk) to allow MSE and other work to proceed as scheduled in 2017.***

**Compliance Monitoring Scheme:** 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 *publicly*. Member reports on the implementation of WCPFC measures, known as *Part II reports*, also remain confidential. **ISSF urges the Commission to:**

- ***Reform its CMS process so that accredited observers may attend the working group meetings and information on CCM's plans to address the areas of identified non-compliance be made public.***

- ***Develop a scheme of responses to non-compliance as soon as possible.***

***Fish Aggregating Device (FAD) Management.*** FADs are one of the most important fishing methods for tropical tunas. However, there are significant gaps in understanding in all t-RFMOs regarding the number of FADs being used and on details of fishing operations on individual FADs. ISSF welcomed the creation of a Working Group on FAD management options in 2014, and was pleased to participate in the 2015 and 2016 meetings. **ISSF urges the Commission to:**

- ***Join ICCAT, IATTC and IOTC and require the use of non-entangling FAD designs as a precautionary measure to reduce the entanglement of sharks, turtles and other non-target species in the purse seine fishery.***
- ***Urgently expand the information required from vessels to include data on FAD deployments, designs, equipment and identification marks.***
- ***Urgently develop recommendations for the management of FADs in the WCPFC.***

***Supply/tender Vessels.*** Supply vessel activities related to drifting FADs increases the efficiency of the purse seiner by reducing the time needed by the purse seiner to search for or maintain FADs. Greater data collection is needed regarding supply vessels, as well as regulation and monitoring. **ISSF urges the WCPFC to:**

- ***Collect data on the number and use of supply vessels, including identifying which particular purse seine vessels each support, and the number of FADs being deployed and serviced by such vessels.***
- ***Identify on the Record of Fishing Vessel what activities supply vessels are engaged in, whether they are working as bait boats, servicing FADs, or engaging in fishing.***
- ***Ensure observer coverage requirements apply to supply vessels so data from these fishing activities are collected and reported.***

***Sharks.*** SC12 recommended that the Commission reconsider CMM 2010-07 that allows CCMs to exclude one mitigation technique (either wire trace or shark-lines) because it has the potential to severely weaken effectiveness. ISSF notes that shark lines are used in many fisheries and these catch mostly silky and oceanic whitetip sharks, whose retention is prohibited. Additionally, requiring sharks be landed with fins naturally attached is the best way to monitor compliance with finning bans (given low observer coverage rates in some fisheries) while collecting species-specific data on shark catches that is vital to the long term conservation and management of shark populations. Furthermore, ISSF notes with concern the reports presented to the Technical and Compliance Committee of significant instances of finning of oceanic whitetip and silky sharks, both of which have retention prohibitions in place. **ISSF urges the Commission to:**

- ***Adopt the SC12 recommendations on sharks to prohibit the use of shark lines in order to improve compliance.***
- ***Require that sharks be landed with fins still naturally attached.***

***Longline Fisheries: Observer coverage, transshipment, and operational-level data.*** ISSF notes with concern the low levels of observer coverage in the WCPFC longline fishery (data indicates that coverage rates may be less than the required 5%). ISSF also notes that often the paucity of data on catches and interactions with non-target species prevents assessments and adoption of conservation measures. Also with low observer coverage rates, there is little information on the level of implementation on the water of RFMO bycatch mitigation and/or handling measures. ISSF is equally concerned with the continued failure of some CCMs to provide the required transshipment reports or advance notifications. ISSF recognizes the work of the WCPFC EmEr working group and that electronic monitoring systems and e-reporting are being tested and developed which could potentially be used to address some of these problems.

ISSF also notes with concern the SC12 information about the continued lack of operational data for longline fleets in the high seas. Scientists have noted that insufficient operational level data undermines the

development of standardized longline CPUE indices, which are critically important inputs to stock assessments, among other impacts of these data gaps.

**ISSF urges the Commission to:**

- ***Strengthen CCM compliance with the existing 5% observer coverage requirement by identifying and sanctioning non-compliance through the Compliance Committee.***
- ***Request the Scientific Committee to recommend a level of observer coverage that would be appropriate to provide reasonable estimates of total bycatch, such as 20%, which has been recommended by the scientific committees of IATTC and ICCAT.***
- ***To support the recommendations of the EmEr Working Group and the Technical and Compliance Committee to progress the development of an E-monitoring Program, and adopt standards for E-reporting, as soon as possible.***
- ***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.***
- ***ISSF maintains that all CCMs must meet their obligations regarding data submissions and provide historical and operational data to the Commission by the agreed deadlines and in the correct formats***
- ***ISSF urges the Commission to consider appropriate responses to promote compliance by those CCMs who have not yet provided operational catch and effort data.***

***Port State Measures:*** Effective port State measures form an important component in addressing IUU fishing. ***ISSF urges all Members that have not yet done so to ratify the 2009 FAO Agreement on Port State Measures to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing and for WCPFC to adopt a measure to give effect to it at a regional level.***

***Closed Vessel Registries and Management of Fleet Capacity.*** Fishing fleet overcapacity increases pressure to weaken management measures and eventually leads to stock overexploitation. SC11 reviewed preliminary estimates of potential tropical purse seine fleet sizes given existing effort limits and candidate skipjack target stock levels. These analyses indicate that there is overcapacity in the WCPO purse seine fleet. Therefore, 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 2015-01. Since scaling fleet capacity will become even more difficult as new vessels are introduced. ***ISSF urges the WCPFC to take these steps now:***

- ***Establish limited entry through closed vessel registries and to develop a common currency to measure fishing capacity, such as cubic meters of well volume.***
- ***To impose and enforce, as a precautionary measure, measures to limit longliner capacity in the Convention Area and task the SC to make recommendations regarding the levels of longline capacity consistent with sustainable management of target tuna stocks.***
- ***Support the Kobe III call for creating mechanisms to transfer capacity to developing countries.***

***More Information and Technical Resources:*** For more information on RFMO best practices, ISSF has produced and published technical papers and workshop reports in the following areas: RFMO compliance processes, purse seine observer programs, IUU Vessel Lists, transshipment, supply vessels, VMS, bycatch, stock status and stock assessment methods, and tuna management and vessel capacity. These resources are all available at: <http://iss-foundation.org/knowledge-tools/technical-and-meeting-reports/>