



**COMMISSION  
THIRTEENTH REGULAR SESSION**  
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5 – 9 December, 2016

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**VIEWS ON TROPICAL TUNA CMM**

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**WCPFC13-2016-DP08  
4 November 2016**

**Proposal from FFA Member CCMs**



**FFA**

4 November 2016

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

Dear Feleti,

### **Tropical Tuna CMM**

I write on behalf of the 17 members of the Forum Fisheries Agency in my capacity as the Chair of the Forum Fisheries Committee.

FFA members thank the Commission Chair for her efforts so far in initiating a considered process over the next year to agree on a follow-on measure for tropical tunas. FFA members have considered this issue, including the initial draft measure and the discussions at TCC, and now wish to offer the following views to guide further development.

#### Process

FFA members agree that a suitable measure cannot be designed solely in the regular sessions of the Commission and subsidiary bodies, but will require intersessional work as well. While we are prepared to invest additional time and effort into such a process next year, FFA members will be vocal at WCPFC13 about prioritising and managing the workload for next year. In particular, we will not be in a position to agree to continuation of the intersessional working group meetings that have taken place over the last few years such as on FAD management, ER and EM, and CDS.

This also has implications for the Harvest Strategy Workplan, which is another very high priority. While we remain committed to the harvest strategy work plan, we feel that this work on the tropical tuna measure may need to take some precedence over internal workshops that we would otherwise invest in given that the end result is likely to be in place for several years before formal harvest strategies come on line.

#### Key Elements of a Measure

The starting point for a revised tropical tuna measure is that it must be compliant with all of the provisions of the Convention, including through accurate and comprehensive accounting of SIDS related issues such as specific elements of Articles 10(3) and 30.

FFA members thank the Chair for including south Pacific albacore in the measure as this is likely a response to concerns that we have been raising for some time that this stock has not received sufficient priority in the Commission. However, after detailed consideration, our preference would be to remove it from the tropical tuna measure. Albacore management reform remains amongst our highest priorities, but we are concerned that its inclusion will bring additional complexity to an already difficult balance between longline and purse seine measures. As such, we have proposed in a separate letter that a specific bridging measure for south Pacific albacore be developed separately but alongside the tropical tuna bridging measure, to ensure that robust management arrangements are implemented until such time as a harvest strategy for this species has been developed and implemented.

For bigeye tuna, FFA members are of the view that the objective should simply be to rebuild the stock to the Limit Reference Point within a timeframe of 8 to 10 years. Once that is achieved, or in progress the Commission can further discuss additional precaution to cater for uncertainty and risk, and to engage on a Target Reference Point. The measure should, as a priority, seek to contribute to rebuilding bigeye tuna to the LRP within this timeframe.

Issues of disproportionate burden have been the key constraint in the ability of the WCPFC to adequately respond to bigeye overfishing. In the new measure FFA members will be looking to achieve a better balance of costs and benefits between purse seine and longline measures, and also between high seas and EEZ measures. Importantly, and in conformance with the Convention and CMM 2013-06, the Commission will need to avoid imposing a disproportionate burden, rather than the situation with the current measure, where the burden is imposed and then arrangements are negotiated to try and mitigate it.

A key component of being able to manage disproportionate burden will be to further implement zone based management arrangements to recognise and strengthen coastal State sovereign rights. There are several parts of the measure where this is a focus:

- Reforming the high seas purse seine effort limits to a form that is both fair and equitable;
- Formalising the EEZ rights that non-PNA members have in the purse seine fishery, including discussing options for non-PNA SIDS to enhance their participation in the fishery;
- Entrenching zone based management in the longline fishery, including through recognition of the longline VDS and revising the flag based catch limits accordingly;
- Removing the current complex interplay between flag based FAD limits and zone based effort limits in the purse seine fishery.

Substantial improvements to high seas management are a very high priority for FFA members. This includes strengthening data reporting and observer coverage (including through electronic reporting and electronic monitoring), transshipment reform and greater transparency. High seas reform will play an extremely important role in three interrelated aspects of the measure:

- Avoiding of disproportionate burden;
- Combatting IUU fishing; and
- Contributing to sustainability.

FFA members will be seeking a package of FAD measures that contribute to bigeye conservation while avoiding the unacceptable costs that the current measure has imposed. This is likely to include a combination of measures such as progressively replacing FAD closures with FAD charging and other concepts that PNA members put forward at the recent FAD working group meeting in Pohnpei.

Until the measure starts to take shape we don't have a strong view on the Chair's suggestion that many of the MCS-related elements (charters, ROP, operational data etc) be removed from this measure and housed elsewhere. We do note though that these elements have all been negotiated at length and add significant value to the work of the Commission as a whole so it will be essential that elements don't get lost throughout this process.

Lastly, FFA members are concerned by the large reported growth in annual catch of yellowfin (and to a lesser extent, bigeye) in fisheries other than longline and purse seine. The Commission has not agreed management measures on these fisheries in the past, and that is becoming increasingly important, particularly given the proposed objective for yellowfin.

#### Conclusion

FFA members do not discount how difficult it will be for the Commission to agree on a package of enhanced measures that will achieve the proposed objectives. For our part we are committed to working proactively with the Chair and other CCMs and we look forward to the deliberations in Fiji. We would greatly appreciate if you could make this letter available to other CCMs please.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Christopher Arthur', with a large, sweeping flourish extending to the right.

Christopher Arthur

*Chair*

*Forum Fisheries Committee*