

WWF STATEMENT TO TCC-7 Regular Session Pohnpei, Federated States of Micronesia 28 September – 4 October 2011

Introduction

The importance of the role of the Technical Compliance Committee (TCC) of the Western and Central Pacific Fisheries Commission (WCPFC) cannot be overemphasised. Compliance with conservation and management measures is the greatest challenge that the WCPFC faces, and the greatest responsibility that it must meet. This challenge has been constant since its inception. We can no longer use the excuse that the WCPFC is a still a fledgling RFMO. WWF calls on members of the WCPFC to take heed of the issues and the recommendations raised at TCC-7 and from this year's meetings of the other WCPFC Committees.

Below WWF reiterates its position tabled at the last meeting of the WCPFC in Honolulu in December 2010 (WCPFC-7) and taking into account the WCPFC related meetings held since.

Bigeye and Yellowfin Tuna

WWF calls for improved performance to ensure the sustainable manage of tuna stocks within the mandate of the WCPFC. The latest assessment on yellowfin tuna (YFT) by the SPC noting that the stock is not in an overfished state is encouraging news, however it comes with the responsibility of ensuring that YFT fishing mortality is limited to its 2001-2004 level. The status of bigeye tuna (BET) on the other hand raises a lot of concern.

Bigeye Tuna

The conclusion from the SC-7 Report based on the 2011 assessment of BET in the WCPO indicates that "current levels of catch are unlikely to be sustainable in the long term even at the recent (high) levels of recruitment estimated for the last two decades (SC-7 Summary Report, Para 141f). At the least it is approaching an overfished state but "if recent recruitment is assumed to represent the true productivity of the bigeye stock (Run21), then the higher levels of BMSY and SBMSY would mean that BET is already in an overfished state." (SC-7 Summary Report, Para. 141h).

The SC-7 in its management advice has recommended for BET:

- "A minimum of 32% reduction in fishing mortality from average levels for 2006-2009 to return the fishing mortality rate to FMSY. This recommended level of reduction is equivalent to a minimum 39% reduction of the 2004 level in fishing mortality, and a 28% reduction of the average 2001–2004 levels."
- o The Commission should consider the results of updated projections at WCPFC-8, and adopt additional measures to secure additional reductions in fishing mortality above those expected from the current CMM, to ensure that fishing mortality is reduced to at least the FMSY level, and remove the risk of the stock being overfished."
- "Measures that reduce fishing mortality across a range of fish sizes (e.g. fishing gears) are likely to produce the best results."
- Use of a spatial management approach.
- o The timely provision of all data necessary for stock assessment purposes.
- o The Commission should consider the results of updated projections at WCPFC-8.

WWF would like to reiterate its recommendation from WCPFC-7 for the need to support fully the SC recommendation to the WCPF Commission for returning the WCPO BET stock back to sustainability.

Yellowfin Tuna

The conclusion from the SC-7 Report based on the 2011 assessment of YFT in the WCPO indicates that overfishing is not occurring and that the stock is not in an overfished state.

The SC-7 in its management advice has recommended for YFT:

- o Improved data collection that will better inform the robustness of the YFT fishery in the WCPO, in particular catch data particularly from the domestic fisheries of Indonesia and the Philippines, and the purse-seine catch (SC-7, Paragraph 184); and
- That due to differences in fishing mortality and exploitation rates between regions (highest in region 3, i.e. the western equatorial region accounting for approximately 81% of the total YFT catch), there should be no increase in fishing mortality in the western equatorial region (SC-7, Paragraphs 198-200).

WWF calls for the precautionary approach to be observed, and supports the Scientific Committee's recommendation to the Commission made previously for YFT in the WCPO to limit YFT fishing mortality to its 2001-2004 level.

Reference points

The WCPFC has not adopted formal reference points for any tuna or tuna related species under its management.

WWF noted that in 2009 a special workshop on reference points was held by the WCPFC Scientific Committee's Methods Specialist Working Group. WWF understands that it was expected that the Scientific Committee would make recommendations on appropriate provisional limit reference points

for the key target species to the WCPFC in 2010. The Commission's decisions on reference points will also take into account the outcomes of the Workshop on Management Objectives held in 2010. WWF notes, however, that reference points have been under consideration in the WCPFC since 2006.

There can be no certainty that this will not be delayed again or the Commission will formally adopt them.

WWF strongly urges the WCPFC to formally adopt limit and target reference points. The adoption of explicitly determined limit and target reference points for at least the four key tuna species, namely skipjack, albacore, yellowfin, and bigeye, is an absolute priority for the sustainable management of these resources in the WCPO.

Harvest strategy & Harvest control rules

There are no explicit harvest control rules in the WCPFC. Monitoring of the stocks is based on catch and effort data, length-frequency and tagging data. The current rudimentary harvest strategy employed in the WCPFC does not contain any harvest control rules and as such does not reflect best practice. The primary management action involves limiting fishing effort via an array of input controls such as the PNA's VDS, closure of high seas pockets, FAD closures, and implementation of capacity limits (driven by concerns for BET and YFT).

The Convention for the WCPFC includes default target and limit reference points and the management objective for all target stocks is to maintain stocks at or above MSY-based reference points. The absence of harvest control rules that provide for immediate and effective action to reduce exploitation rates, when and as required, is a serious concern. This is potentially an increasingly scrutinized flaw in the management of these fisheries if an international market perspective is taken.

While the WCPFC could argue that it is capable of implementing management action in response to scientific advice on stock status (for example BET and YFT), the effectiveness of this action is questionable and this underlines the importance of well defined harvest control rules to ensure timely and adequate management.

WWF calls on the WCPFC to adopt harvest control rules that are well-defined, pre-agreed and contain mandatory actions for an agreed and determined course of management action in response to changes in indicators of stock status with respect to reference points.

Regional Observer Program (ROP)

WWF noted in its WCPFC-7 joint statement that there was no current impediment for all support vessels to have 100% observer such as that currently in place on purse seine vessels, while 100% observer coverage for longliners should be phased in. The joint statement suggested then that the following timetable be pursued for a 3-year phase-in of 100% Regional Observer Programme (ROP) coverage for all fishing vessels including:

- 2011 All support vessels (resupply, refueling, reefers) for all high seas fishing have 100% ROP coverage;
- 2011 20% of all longliners (including at least one from each flag state) have an ROP observer on board:
- 2012 50% of all longliners (including more than half of all vessels from each flag state) have an ROP observer on board; and
- 2013 100% of all longliners have an ROP observer on board.

2011 is now entering its final quarter. Observer coverage is a priority and greater support should be given to the relevant authority to see that the capacity of the ROP is strengthened. Fisheries is a priority revenue earner for many countries in the Pacific and as such must be given the recognition that it deserves in terms of strengthening conservation and management capacity. Furthermore, along with compliance issues, the increasing scrutiny by international markets of supply can be much better addressed if there is transparent information. Without a doubt, observers are a key link in this information chain.

WWF considers the presence of observers on every fishing and support vessels fundamental to fishing best practice and calls for a comprehensive and strong Regional Observer Program with 100% coverage of all fishing vessels (including both catching and support vessels).

Catch Documentation Scheme

WWF considers the failure to implement a catch documentation scheme (CDS) as a significant problem. The WCPFC must take urgent action to address overfishing and to support and enforce that action by introducing a CDS. WWF recognises that the introduction of a CDS will pose some challenges to the WCPFC given the nature of tuna fisheries. However, WCPFC needs to ensure that all fish stocks managed by this RFMO are subject to the CDS as a proactive precautionary measure.

WWF recommends the adoption of a CDS measure for at least the four key tuna species with a date of implementation to be agreed and:

- 1. to the implementation of a CDS that requires documentation to accompany all catch harvested, landed, transshipped, traded domestically, exported, processed, imported and reexported and which relies on electronic documentation. The CDS should not exclude any catches, landings or trade as is common in schemes which are trade based rather than catch document schemes. One only has to look to the lessons learnt by the Commission for the Conservation of Southern Bluefin Tuna (CCSBT) which has switched from a trade based scheme to a CDS due to the trade scheme allowing for substantial over catches by one of its members as a result of the trade scheme not being inclusive of all catches, landings or trade;
- 2. that complementary measures are in place to maximize the effectiveness of the CDS by:
 - ensuring that transshipment at sea does not compromise the effectiveness of the CDS;

- o adopting Port State measures (consistent with the global Port State Measures Aagreement) to take effect at the same time as the tuna CDS; and
- adopting measures that provide for trade-restrictions to be used against flag States with vessels on the IUU list.
- 3. acknowledging the need to implement CDS for other species of tunas, billfish and sharks managed by the Commission;
- 4. a commitment to continuous improvement of the CDS by investigating the benefits and feasibility of verification systems such as tagging and the use of biotechnology;
- the establishment a capacity development fund to act as a cost-sharing mechanism to enable for cross subsidising across wealthy and less-wealthy members to ensure effective implementation and administration of the CDS; and
- 6. maximizing retailer and public access to CDS data through modern online tools.

Conclusion

WWF calls on the Commission to realistically look at our conduct as nations with and responsible for managing tuna resources and as fishing nations and honestly examine whether we agree that our actions have been responsible and commendable. There is this opportunity to make a difference to improve the health of our tuna resources. A fisheries collapse is a reality that should constantly be present at the back of our minds. Effective management action must be adopted to restore tuna stocks, implement appropriate measures, and promote a viable tuna industry in the Pacific.

References:

WCPFC Scientific Committee (2011) Summary Report of the Seventh Regular Session of the Scientific Committee (Adopted version) – rev.3 (21 September 2011), WCPFC, Pohnpei, FSM, 9-17 August 2011

WWF-TRAFFIC (2010) WWF-TRAFFIC Position Statement to WCPFC 7, WCPFC-2010-OP-04, Honolulu, Hawaii, 6-10 December 2010