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“Rev2 of the Chair’s Consultative Draft on the Tropical Tuna Bridging CMM

**WCPFC13-2016-20_Rev1
8th December 2016**

Submitted by the Chair

Explanatory Note from the Chair

Rev2 of the Chair's Consultative Draft on the Tropical Tuna Bridging CMM reflects comments received from CCMs during the plenary discussion at TCC12 and during WCPFC13. Where comments related specifically to any proposed text, I have included those comments next to the relevant text. The comments which were included in Rev 1 are written in *red*, while those new comments are written in *blue*.

A number of comments from CCMs were general, in nature, and I have included those at the end of the Draft. PNA submitted a revised text which provided comments on the preambular paragraphs and edits on the original text of CMM 2015-01, including on paragraphs which I am proposing to shift to other CMMs. I have incorporated those comments into the Bridging Measure structure.

WCPFC13 will consider a process for progressing this draft throughout 2017.

PREAMBLE

The Western and Central Pacific Fisheries Commission (WCPFC):

Recalling that since 1999, in the Multilateral High Level Conferences, the Preparatory Conferences, and in the Commission for the Conservation and Management of Highly Migratory Fish Stocks in the Western and Central Pacific Ocean (the Commission), a number of resolutions and Conservation and Management Measures (CMMs) have been developed to mitigate the overfishing of bigeye and yellowfin tuna and to limit the growth of fishing capacity in the Western and Central Pacific Ocean and that these measures have been unsuccessful in either restricting the apparent growth of fishing capacity or in reducing the fishing mortality of bigeye or juvenile yellowfin tuna;

2015-01
PP1

PNA – delete reference to yellowfin as it is not subject to overfishing.

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 and the Agreement;

2015-01
PP2

Recalling further the final statement of the Chairman of the Multilateral High Level Conferences in 2000 that: “It is important to clarify, however, that the Convention applies to the waters of the Pacific Ocean. In particular, the western side of the Convention Area is not intended to include waters of South-East Asia which are not part of the Pacific Ocean, nor is it intended to include waters of the South China Sea as this would involve States which are not participants in the Conference” (Report of the Seventh and Final Session, 30th August- 5 September 2000, p.29);

2015-01
PP3

Recognizing that the Scientific Committee has determined that the bigeye stock is overfished, requiring reductions in fishing mortality to rebuild the stock; and that the yellowfin stock is currently being fished at capacity, requiring prevention of any further increases in fishing mortality to ensure that the stock remains at or above levels consistent with MSY; (Note: this will be revisited to reflect stock status following the 2017 assessment.)

Based on
2015-01
PP4

Recognizing that the Scientific Committee has advised the Commission that longline fishing mortality and longline catch of South Pacific Albacore be reduced to avoid further decline in the vulnerable biomass so that economically viable catch rates can be maintained; (Note: this may need to be updated following SC12.)

2015-02
PP1

PNA – SPC could be asked to include some text on skipjack at this point since bigeye, yellowfin and albacore are all referred to in the preamble

Recognizing further the interactions that occur between the fisheries for bigeye,

2015-01
PP5

*Reflecting comments received during TCC12 and at WCPFC13.

yellowfin, skipjack tuna and south Pacific albacore;

Noting that Article 30(1) of the Convention requires the Commission to give full recognition to the special requirements of developing States that are Parties to the Convention, in particular small island developing States and Territories and possessions, in relation to the conservation and management of highly migratory fish stocks in the Convention Area and development of fisheries on such stocks, including the provision of financial, scientific and technological assistance;

2015-01
PP6

Noting further that Article 30(2) of the Convention requires the Commission to take into account the special requirements of developing States, in particular Small Island developing States and Territories. This includes ensuring that conservation and management measures adopted by it do not result in transferring, directly or indirectly, a disproportionate burden of conservation action onto developing States, Parties and Territories;

2015-01
PP7

Noting Article 8(1) of the Convention requires compatibility of conservation and management measures established for the high seas and those adopted for areas under national jurisdiction;

2015-01
PP8

Noting Article 8(4) of the Convention which requires the Commission to pay special attention to the high seas in the Convention Area that are surrounded by exclusive economic zones (EEZs);

2015-01
PP9

Noting that the Parties to the Nauru Agreement (PNA) have adopted and implemented "A Third Arrangement Implementing The Nauru Agreement Setting Forth Additional Terms And Conditions Of Access To The Fisheries Zones Of The Parties"

Based on
2015-01
PP10

Noting further that the Parties to the Nauru Agreement have adopted and implemented a Vessel Day Scheme for the longline fishery and a registry for FADs in the Zones of the Parties and that the Parties to the Tokelau Arrangement have adopted [and implemented] a system of zone-based catch limits for South Pacific Albacore in the Zones of the Parties.

New

PNA – The text is OK but the result is there is a reference to the LL VDS and not the PS VDS.

Acknowledging that the Commission has adopted a limit reference point (LRP) for South Pacific albacore, bigeye, skipjack and yellowfin tuna of 20% of the estimated recent average spawning biomass in the absence of fishing, and, for skipjack tuna, has also agreed to an interim target reference point (TRP) of 50% of the recent average spawning biomass in the absence of fishing (CMM 2015-06);

Acknowledging that the Commission has adopted CMM 2014-06 on Establishing a Harvest Strategy for Key Fisheries and Stocks in the Western and Central Pacific

New

Ocean and a Work Plan to guide the development of key components of a Harvest Strategy, including the recording of management objectives;

Adopts in accordance with Article 10 of the Convention, the following Conservation and Management Measure with respect to South Pacific albacore, bigeye, yellowfin, and skipjack tuna:

PURPOSE

1. The purpose of this measure is to provide for a robust transitional management regime that ensures the sustainability of ~~South Pacific albacore~~, bigeye, skipjack, and yellowfin while the Commission continues to develop and establish harvest strategies pursuant to CMM 2014-06.

New

FFA members support removing SP Albacore from the TT Bridging CMM and progressing issues separately; China has difficulties with including SPALB in the Draft and US feel that it's "taking on too much" to include SPALB in the Draft. Australia - CMM should draw on previously agreed harvest strategy elements and provide for harvest strategy-based management.

OBJECTIVES

FFA members prefer to consider alternatives to MSY objectives due to practical difficulties with FMSY, noting that the setting of 20% biomass LRP was done with consideration of biomass-based reference points; EU pointed out the Convention text which refers to MSY objectives. These should be included in objectives. Also add that should be in line with Convention objectives.

2. The objectives of this measure are to ensure that:

Based on
2015-01
OP 1

a. Reference points

The stock-specific objectives of this measure are amended or replaced with target reference points following their adoption by the Commission. Pending their adoption, all stocks are managed so that their adult biomass remains above the adopted limit reference point of 20% of the estimated recent average spawning biomass in the absence of fishing, ($SB_{F=0,t1-t2}$) with high probability.]

(Note: Commission would need to define "high probability".)

FFA – support biomass objectives. EU – should be based on biological considerations.

US - Since the Commission has partially developed harvest strategies for the relevant fisheries, including limit reference points for all three tropical tuna stocks and a target reference point for WCPO skipjack tuna, the CMM should point to those harvest strategies to serve as its objectives.

b. South Pacific Albacore

*Reflecting comments received during TCC12 and at WCPFC13.

Pending agreement on a target reference point, the spawning biomass of South Pacific albacore tuna is maintained at or above the most recently assessed level (for 2013, 40% of spawning biomass in the absence of fishing using the base case assessment assumptions). In addition, the fishing mortality rate for South Pacific Albacore is maintained at a level no greater than F_{msy} , i.e. $F/F_{msy} \leq 1$.

FFA – support proposed interim objective. US – prefer that SPALB not in measure.

c. Bigeye

Pending agreement on a target reference point, the spawning biomass of BET is rebuilt to [xx% of the spawning biomass in the absence of fishing within x years] [at least 20% of the spawning biomass in the absence of fishing (i.e. the LRP) with at least xx% probability]. In addition, the fishing mortality rate for bigeye tuna is reduced to a level no greater than F_{msy} , i.e. $F/F_{msy} \leq 1$.

FFA – support objective of rebuilding the stock to the LRP within a timeframe of 8-10 years. Australia – support objective of rebuilding the stock to the LRP (20% of unfished biomass) within a timeframe of 8-10 years. PNA – depends on the decisions of WCPFC13. EU – support rebuilding target to MSY (21% of SSB₀) over 8-10 years with probably being over LRP of 50-60%.

d. Skipjack

Pending agreement on a formal target reference point, the spawning biomass of skipjack tuna is maintained on average at a level consistent with the interim target reference point of 50% of the spawning biomass in the absence of fishing, adopted in accordance with CMM 2015-06.

2015-06

Australia – support objective. PNA - understands that the current TRP has been adopted as a formal TRP in the sense that it has been adopted in a CMM with a review process although it is still an interim TRP; PNA propose that the first few words (up to the first comma) be deleted

e. Yellowfin

Pending agreement on a target reference point, the spawning biomass of yellowfin tuna is maintained at or above the most recently assessed level (for 2012, 38% of spawning biomass in the absence of fishing (Note: to be updated in 2017.)) In addition, the fishing mortality rate for yellowfin is maintained at a level no greater than F_{msy} , i.e. $F/F_{msy} \leq 1$.

FFA – support proposed interim objective. Australia – support.

PRINCIPLES FOR APPLICATION

3. The following principles shall guide the application of this measure:

a. Compatibility

Conservation and management measures established for the high seas and those adopted for areas under national jurisdiction shall be compatible in order to ensure conservation and management of ~~South Pacific albacore~~, bigeye, skipjack, and

Based on
Art 5 & 8 of
Convention

*Reflecting comments received during TCC12 and at WCPFC13.

yellowfin tuna stocks in their entirety. Measures shall ensure, at a minimum, that stocks are maintained at levels capable of producing maximum sustainable yield, pending agreement on target reference points as part of the harvest strategy approach, as qualified by relevant environmental and economic factors including the special requirements of developing States in the Convention Area as expressed by Article 5 of the Convention.

Korea – “compatibility” goes in both directions.

b. Area of Application

This Measure applies to all areas of high seas and all EEZs in the Convention Area except where otherwise stated in the Measure. Coastal states are encouraged to take measures in archipelagic waters and territorial seas which are consistent with the objectives of this Measure and to inform the WCPFC Secretariat of the relevant measures that they will apply in these waters.

Based on
2015-01
OP 11 &
OP 12

EU – should include archipelagic waters.

c. Small Island Developing States

Unless otherwise stated, nothing in this Measure shall prejudice the rights and obligations of those small island developing State Members and Participating Territories in the Convention Area seeking to develop their domestic fisheries.

Based on
2015-01
OP 17

- ***PNA – As written this para exempts SIDS from all the provisions in the CMM relating to their fleets and EEZs. PNA understand that that is not the intention.***
- ***The provisions to which this para will apply will depend on the extent to which the final text removes the need for exemptions.***
- ***That depends in particular on the extent to which historical flag-based limits are removed and replaced by fairer, more effective provisions, and the extent to which the disproportionate burden on SIDS from the existing measures is removed.***
- ***The existing para 8 needs to be put back to reflect Article 10.2.i of the Convention***

SPECIES/STOCK MANAGEMENT

This section acknowledges the current approach taken thus far in the development of a harvest strategy with respect to each species, and provides a bridge to the development of a harvest strategy framework that is compatible with that agreed in CMM 2014-06.

FFA – support reflection of 20% LRP for all species covered in the Draft.

EU – LRP should be based on biological considerations in line with definition of LRP in Appendix 1 of CMM-2014-06. Therefore should be considered on a stock by stock basis.

*Reflecting comments received during TCC12 and at WCPFC13.

US – like the harvest strategies, this CMM would be best structured around fisheries, as in CMM 2015-01, rather than around stocks.

4. Albacore (South Pacific) – LRP is 20%

Elements for Consideration

~~Latest (2015) SC advice is:~~

~~Despite the fact that the stock is not overfished and overfishing is not occurring, SC11 reiterates the advice that longline fishing mortality and longline catch be reduced to avoid further decline in the vulnerable biomass so that economically viable catch rates can be maintained.~~

~~Acceptable Level of Risk – pending WCPFC13 decision~~

~~Target Reference Point – pending WCPFC 13 decision~~

~~Existing in zone measures~~

~~Tokelau Arrangement~~

~~Existing high seas measures~~

~~Capacity limits (CMM 2015-02)~~

~~Other commercial fisheries~~

FFA members support removing SP Albacore from the TT Bridging CMM and progressing issues separately; China has difficulties with including SPALB in the Draft. Australia – should not include SPALB. EU – should not include SPALB. US - would prefer that SPALB not be included in the measure.

5. Bigeye – LRP is 20%

Elements for Consideration

Latest (2015) SC advice is:

SC10 recommended that fishing mortality on WCPO bigeye tuna be reduced. A 36% reduction in fishing mortality from the average levels for 2008–2011 would be expected to return the fishing mortality rate to FMSY. This reduction of at least 36% should also allow the stock to rebuild above the LRP over a period of time. This recommended level of reduction in fishing mortality could also be stated as a minimum 33% reduction from the 2004 level of fishing mortality, or a minimum 26% reduction from the average 2001–2004 level of fishing mortality.

STOCK ASSESSMENT PLANNED FOR 2017

Rebuilding timeline, AGREED BY WCPFC13

FFA – support objective of rebuilding the stock to the LRP within a timeframe of 8-10 years. Once this achieved or in progress, can discuss additional precaution and

*Reflecting comments received during TCC12 and at WCPFC13.

engage on a TRP. Australia – support objective of rebuilding the stock to the LRP (20% of unfished biomass) within a timeframe of 8-10 years. EU - support rebuilding target to MSY (21% of SSBo) over 8-10 years with probability being above LRP of 50-60%.

Acceptable Level of Risk – pending WCPFC13 decision

TRP – pending WCPFC14 decision

Existing in zone measures

PNA Longline VDS

FAD closure/limits

Catch retention for purse seine vessels

Korea – Longline management should not be modeled on the purse seine VDS. Applying VDS to longliners in-zone can be addressed through bilateral arrangements. EU – should be equivalent measures in EEZs and high seas.

Zone based measures

FFA – Need to further implement zone based management arrangements:

- Reforming the high seas purse seine efforts limits so fair and equitable;***
- Formalizing the EEZ rights that non-PNA members have in the purse seine fishery;***
- Entrenching zone based management in the longline fishery, including through recognition of the longline VDS and revising 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.***

Australia – support zone based management arrangements.

Non-PNA FFA – Support zone based effort limits in EEZs of Fiji (300 days); Niue (200 days); Samoa (150 days); Tonga (250 days); Vanuatu (200 days), totaling 1100 days. Note that will develop measures such as pooling and transferability of limits both within relevant EEZs and between EEZs and the high seas.

Existing high seas measures

FAD closure (2017)/limits

HS pocket closures

Catch retention for purse seine vessels

FFA – Substantial improvements to high seas management are a high priority. Includes strengthening data reporting and observer coverage, transshipment reform and greater transparency. US – Support flag-based annual limits on purse seine fishing effort and flag-based limits on numbers of FAD sets.

High seas management

*Reflecting comments received during TCC12 and at WCPFC13.

PNA – are considering extension of the catch retention provision to include other species important for food security such as rainbow runner and mahi mahi. This will both increase the incentive of the catch retention arrangements for vessels to fish on free schools and contribute to food security. Also – support a ban on transshipment of frozen bigeye at sea between 30 north and 10 south as an essential element of any progress on strengthening the CMM and as a good example of a measure that the Commission can take to contribute to offsetting the disproportionate burden of the existing CMM on SIDS.

FAD management

FFA – Will seek a package of FAD measures that contribute to bigeye conservation while avoiding unacceptable costs, such as progressively replacing FAD closures with FAD charging and other such concepts.

Korea – current FAD measures should be retained with no exemptions. FADs should be clearly defined for more effective implementation of the FAD measures.

PNA – Footnote 2 in CMM 2015-01 has to be retained. Supports 3 month closure (with revisions), and no 4th or 5th month closure, and high seas FAD closure with only Kiribati exemption, as part of a package with appropriate measures to improve control of high seas tropical longline fishery. Proposes a provision ensuring that no vessel commences a set between midnight (local nautical time) and sunrise during the periods of FAD closure applying to the vessel to reduce the risk that sets are being made on schools associated with floating objects during the FAD closure. Supports deletion of FAD management plan provision as there is no evidence that those Plans are effective and are redundant with the high seas FAD closure.

EU – In order to minimize the ecological impact of FADs, in particular the entanglement of sharks, turtles and other non-associated species, and the release of synthetic persistent marine debris: gradually replace existing FADs with biodegradable and non-entangling FADs, with a view to phase out non-biodegradable FADs by [xxxx].

WCPFC region-wide measures

Flag-based longline bigeye catch limits

Korea – support existing longline bigeye catch limits on basis that they are predictable, reliable, and achieve intended objective. Longline management should not be modeled on the purse seine VDS as effort (input) controls leave uncertainties and may not be effective. PNA - propose to include the PNA LL VDS using the same language as in para 20 of CMM 2015-01 for the purse seine VDS. This will require adjustments to the limits set in Attachment F since those limits will no longer cover PNA waters. In regard to Attachment F, the US limit has only been cut by 20% from the original baseline figure, instead of the 40% cut applied to all other major fleets. There is no basis for this exemption and it should be removed.

*Reflecting comments received during TCC12 and at WCPFC13.

US - For the tropical longline fishery, US would like annual flag-based bigeye tuna catch limits focusing on areas of high exploitation (between 20N and 20S) and would like to see limits on the numbers of longline vessels. For the tropical purse seine fishery (between 20N and 20S) the US would like to see:

- a. Flag-based annual limits on fishing effort***
- b. Flag-based limits on numbers of FAD sets***
- c. Limits on vessel numbers, starting with a freeze for non-SIDS vessels at 2012 levels, requiring reductions in future years for non-SIDS fleets in a manner similar to that proposed by Japan (WCPFC12-DP14rev1), and allowing reasonable increases in sizes of SIDS fleets.***

Other commercial fisheries

FFA – Concerned over growth in catches in other fisheries and management measures increasingly important. PNA – This is an important priority. CCMs and fisheries with catches exceeding 2,000 tonnes of the 3 tuna species need to be listed with the obligation to establish effort limits and SPC and WCPFC Secretariat could be tasked to work with the CCMs involved to establish the appropriate limits.

Capacity Management

Longline freezer vessels

Ice chilled LL vessels landing exclusively fresh fish

EU – Need to address capacity management in the region while respecting development aspirations of developing States.

6. Skipjack – objective is 50% TRP (interim); LRP is 20%

Elements for Consideration

Latest (2015) SC advice is:

SC10 recommends that the Commission take action to avoid further increases in fishing mortality and to keep the skipjack tuna stock around current levels, with tighter purse-seine control rules and advocates for the adoption of TRPs and harvest control rules.

Acceptable Level of Risk – pending WCPFC13 decision

EU – 20% probability of being below LRP.

Existing in zone measures

PNA Purse Seine VDS

Nominated zone-based effort/catch limits

Korea – Current purse seine VDS should be applied as flag-based effort limits that cover the range of target stocks to ensure compatibility. PNA – supports existing

*Reflecting comments received during TCC12 and at WCPFC13.

purse seine effort controls for participants in the PNA purse seine VDS, and a table setting specific limits for the non-VDS participants' EEZs.

Zone based measures

FFA – Need to further implement zone based management arrangements:
- Reforming the high seas purse seine efforts limits so fair and equitable;
- Formalizing the EEZ rights that non-PNA members have in the purse seine fishery;
- Entrenching zone based management in the longline fishery, including through recognition of the longline VDS and revising 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.
Australia – support zone based management arrangements.
Non-PNA FFA – Support zone based effort limits in EEZs of Fiji (300 days); Niue (200 days); Samoa (150 days); Tonga (250 days); Vanuatu (200 days), totaling 1100 days, and SKJ catch limit of 3000 mt for Niue. Note that will develop measures such as pooling and transferability of limits both within relevant EEZs and between EEZs and the high seas.

Existing high seas measures
VDS limits

PNA – continue to support the proposal for a hard limit on purse seine effort in the high seas, preferably based on the 2010 level, for compatibility with the hard limits being applied in PNA EEZs.

- PNA are open to proposals as to how that limit should be allocated.*
- If no allocation can be agreed PNA continue to support an Olympic limit split into 4 quarterly limits.*
- PNA have proposed text that is the same as PNA have previously put forward with Japan.*

EU – Should have effort limits for some CCMs.

US - would like to see for the tropical purse seine fishery (between 20N and 20S):
a. Flag-based annual limits on fishing effort
b. Flag-based limits on numbers of FAD sets

Other commercial fisheries

Capacity Management
Large Scale Purse Seine Vessels

Japan - stresses the need for capacity management, particularly a scheme to jointly reduce LSPSV operating in the tropical area to Dec 31, 2012 levels among CCMs other than SIDS; will provide a proposal on joint capacity reduction with some modifications at WCPFC13; more consideration should be given to implementation

*Reflecting comments received during TCC12 and at WCPFC13.

of Commission decisions. US – supports limits on vessel numbers, starting with a freeze for non-SIDS vessels at 2012 levels, requiring reductions in future years for non-SIDS fleets in a manner similar to that proposed by Japan (WCPFC12-DP14rev1), and allowing reasonable increases in sizes of SIDS fleets. Korea – supports a cap on the total number of large-scale purse seiners within WCPO, with possibility of capacity transfer amongst CCMs. PNA – supports deletion of capacity management paragraphs and replace with wording for flag states to support their fleets to adjust to the changes as SIDS fleets expand and replace some existing fleets, in both the longline and purse seine fisheries, including ensuring that displaced vessels do not contribute to IUU fishing.

7. Yellowfin – LRP is 20%

Elements for Consideration

Latest (2015) SC advice is:

SC recommended that the catch of WCPO yellowfin tuna should not be increased from 2012 levels, which exceeded MSY, and measures should be implemented to maintain current spawning biomass levels until the Commission can agree on an appropriate TRP.

STOCK ASSESSMENT PLANNED FOR 2017

Acceptable Level of Risk – pending WCPFC13 decision

EU – 20% probably of being below LRP.

Obligation to adopt specific measures for yellowfin have been outstanding; only monthly reporting obligations have been in place.

PS effort limits designed for skipjack provide benefits for yellowfin.

FAD closures demonstrated no negative effects on yellowfin.

Other commercial fisheries

FFA – Concerned over growth in yellowfin catches in other fisheries and management measures increasingly important.

PNA - The fishery is managed by effort limits and purse seine yellowfin catches have been stable since hard limits were applied in EEZs from 2012. The major need is for hard limits on high seas effort to avoid increased purse seine fishing on yellowfin in the high seas. Flag-based purse seine yellowfin catch limits based on a historical level will be ineffective because Non-SIDS fleets are declining so historical limits will have little or no effect, and SIDS will have to be exempt. Also, there is no basis in the advice from SC for any yellowfin measures to be adopted. So paragraphs 28 and 29 of CMM 2015-01 should be deleted.

EU – consider catch limits for YFT based on SC recommendations.

MCS and Other Provisions

****Note:** Issues relating to charters, non-parties, VMS, ROP, and data provision requirements will be taken up through existing measures and requirements.

FFA – No strong view but essential that the elements are not lost in the process. US – CMM should not include MCS-related requirements.

PNA – If there are flag-based limits, the attribution of charters will need to be retained in this CCM or another. Deletion of non-Parties paragraph seems reasonable. There should be a provision controlling purse seine effort outside 20N-20S, ie north of 20N it should be limited to 2010 levels, and there should be no purse seine fishing in the high seas south of 20S. Deletion of overlap paragraph is ok as long as covered in another CMM. The ban on deploying and servicing FADs without an observer (para 33 of CMM 2015-01) should obviously apply to tender vessels and other support vessels as well as the purse seine fishing vessels. Seek a provision on longline freezer vessels that have caught more than 20 tonnes of bigeye not operating under manual reporting. Support 20% observer coverage of longline vessels fishing on the high seas.

EU - Discards: clarify current exemptions for purse seiners and adopt similar measures for long line (discard ban). Observers: increase the coverage of observers onboard LL vessels to 20%.

US – agrees that this CMM should not include MCS-related requirements such as VMS and observer requirements; such requirements should be included in the CMMs devoted to those tools.

Exemptions

US - supports limited exceptions and special provisions. Australia – CMM should eliminate need for exemptions to address disproportionate burden on SIDS. Korea – should not allow exemptions and explore ways to address special requirements of developing States. EU – no exemptions to make it easier to apply and monitor.

Duration

US - supports a duration of the CMM of at least three years. PNA – depending on the outcome, 3 or 4 years would seem appropriate.

GENERAL COMMENTS

PNA - support streamlining new CMM with a view to removing exemptions and making CMM more focused; support elements linking to harvest strategy framework; reform management of longline fishery, including high seas longline activities; remove existing disproportionate burden on SIDS from the current FAD

closure; improve management of bigeye in a way that doesn't transfer disproportionate burden to SIDS.

European Union - supports approach in the Draft, in general, but will provide more detail later; supports linking tropical tuna management with progress on harvest strategies; in general, also concerned with capacity issues; support measures aimed at regulating the fishery and closing loopholes.

FFA - recognize that disproportionate burden has been addressed partly through CMM 2013-06, but no progress made on the fundamental issue; as a result the 5th month FAD closure has never been implemented; must address disproportionate burden rather than rely on measures designed to compensate; propose reform of high seas activities as a way to address disproportionate burden as reform can be done in a way that benefits SIDS; remove flag-based arrangements (LL limits, capacity limits); recognize SIDS rights in fishery through zone-based arrangements which reduces need for exemptions. Emphasizes importance of avoiding disproportionate burden.

Need to consider what has and what has not worked—success is seen in the provision of purse seine effort managed through the Vessel Day Scheme; evolution of catch/effort provisions for other EEZs has been useful but should be more specified; less confident on effectiveness of longline catch limits because of the high starting points and they've been achieved without any substantial reduction in effort; misreporting and underreporting has contributed to lack of success; support fewer exemptions and alternatives which supports measures to reduce disproportionate burden.

FFA - Agree will require intersessional work, but concerned over the number of intersessional working group meetings and need for prioritization.

Australia - supports improvement of management arrangements; open to moving MCS provisions to existing CMMs, contingent on agreement for their inclusion in other measures; WCPFC13 may need to consider holding a workshop in 2017 to progress drafting.

Kiribati - consider geographical situation of Kiribati reflected in Article 10 of the Convention. PNA – support.

*US - 1. The proposal should be as straightforward as possible, with limited exceptions and special provisions.
2. The CMM should rely to the extent possible on flag-based limits and requirements so as to cover the range of the stocks as needed and promote compatibility in the application of measures on the high seas and areas under national jurisdiction. This would not preclude coastal CCMs from imposing, for*

*their own purposes, limits and requirements in waters under their jurisdiction.
consider general criteria for any conservation and management measure:*