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the wildlife trade monitoring network

WWF & TRAFFIC STATEMENT TO WCPFC – 8th Regular Session Guam, 26-30 March 2012

Introduction and Summary

The challenge of overfishing facing the globe is immediate and pressing. The WCPFC is no longer a fledgling RFMO and has matured. WWF & TRAFFIC call on members, participating territories and cooperating non-members of the WCPFC to take heed of the issues and recommendations raised at TCC-7 and other WCPFC Committees and priorities action on:

I. Harvest strategy & Harvest control rules

WWF & TRAFFIC call 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.

II. Reference points

WWF & TRAFFIC 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 (SKJ), albacore (ALB), Yellowfin (YFT), and bigeye (BET), is an absolute priority for the sustainable management of these resources in the WCPO.

III. Tuna species

III.1. Bigeye Tuna

WWF & TRAFFIC reiterates 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 levels above BSMY and therefore implementing measures that successfully reduce levels of fishing mortality by a minimum of 32% from average levels for 2006-2009, or equivalent to a minimum 39% reduction of the 2004 level in fishing mortality, and a 28% reduction of the average 2001–2004 levels.

III.2. Yellowfin Tuna

WWF & TRAFFIC call 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.

III.3. Pacific Bluefin Tuna (PBT)

WWF & TRAFFIC call on WCPFC to remove all current exemptions from CMM-2010-04 and encourage all fishing nations to implement the substantial management measures for juvenile (age0-3) PBT to keep fishing mortality of PBT to no more than its 2002-2004 fishing mortality level.

III.4. South Pacific Albacore

WWF and TRAFFIC support the effort of Island Small Developing States (Pacific SIDS) to strengthen the management strategy for the albacore longline fishery and to address the related species interaction issues. Measures aimed at introducing effective capacity limits and effort management must be urgently addressed by WCPFC and the region's domestic fisheries managers.

IV. Regional Observer Program (ROP)

WWF & TRAFFIC consider the presence of observers on every fishing and support vessel fundamental to fishing best practice and call for a comprehensive and strong Regional Observer Program with 100% coverage of all fishing vessels (including both catching and support vessels). WWF & TRAFFIC call upon the WCPFC to meet the 100% ROP target by 2013.

V. Catch Documentation Scheme

WWF & TRAFFIC recommend the adoption of a comprehensive CDS measure for at least the five key tuna species¹ with a date of implementation to be agreed and implemented.

VI. Mitigation of Bycatch Impacts

WWF and TRAFFIC remind WCPFC members, participating territories and cooperating non-members of their responsibility to address the bycatch of species and act immediately. A number of environmental NGOs (including WWF and TRAFFIC) have developed a Compendium (2011) of best practice Conservation and Management Measures (CMMs) for the bycatch of four taxonomic groups². This Compendium and the individual draft binding measures provides WCPFC with advice on the best practice and precautionary measures that must be implemented on an interim basis pending the determination of optimal mitigation packages based on research and sound science. These actions can be reviewed and revised to reflect that advice when it becomes available.

WWF and TRAFFIC also request that WCPFC implement the recommendations of the joint technical bycatch working group from Kobe III (the joint tuna RFMO process)³.

¹ Bigeye Tuna, Yellowfin Tuna, Albacore Tuna, Skipjack Tuna, Pacific Bluefin Tuna.

² Seabirds, Sharks, Sea turtles and Marine mammals.

³ WCPFC8-2011/15

Main text

WWF & TRAFFIC remind members, participating territories and cooperating non-members of our positions tabled at the last meeting of the WCPFC in Honolulu in December 2010 (WCPFC-7), related subsequent meetings of the WCPFC and the recommendations of the joint tuna RFMO process (Kobe Process) prioritizing:

1. Harvest strategy & Harvest control rules

The precautionary approach, Convention, article 5(c), to fisheries management has been considered a basic element of sustainability since its introduction in the 1995 UN Fish Stocks Agreement. It has been widely adopted in domestic and international law as an underpinning requirement for good management and included in the FAO Code of Conduct for Responsible Fisheries.. It also appears prominently in the FAO Guidelines for Eco-labelling, and is a critical element for consideration in ecolabelling certification schemes such as the Marine Stewardship Council.

The basic tenet is simple: do not take actions that could have an unacceptably high risk of compromising the health of the resource or its environment in the long term. The implementation of a precautionary approach is, in most cases, made operational through pre-agreed management actions (also called 'harvest control rules') that are launched as soon as stock status indicators reach certain critical values (i.e. 'reference points').

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 Vessel Day Scheme (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 & TRAFFIC call 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.

2. Reference points

The WCPFC has not adopted formal reference points for any tuna or tuna related species under its management in accordance with Article 6 (WCPFC 2004).

WWF & TRAFFIC noted that in 2009 a special workshop on reference points was held by the WCPFC Scientific Committee's Methods Specialist Working Group. WWF & TRAFFIC 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 & TRAFFIC note, 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 & TRAFFIC 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.

3. Proposed CMM 2011/01 for Bigeye, Yellowfin and Skipjack tuna in the WCPFC Convention Area

WWF & TRAFFIC sees a need for the improved performance of WCPFC if it is to ensure that tuna stocks it is responsible for are managed sustainably.. The most recent assessment of yellowfin tuna (YFT) by the SPC concludes the stock is not in an overfished state. This 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 significant concern.

3.1. 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 B_{MSY} and S_{BMSY} 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 F_{MSY} . 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.”

- 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 F_{MSY} 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.”
- The use of a spatial management approach.
- The timely provision of all data necessary for stock assessment purposes.
- The Commission should consider the results of updated projections at WCPFC-8.

WWF & TRAFFIC reiterate our 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 levels above BSMY and therefore implementing measures that successfully reduce levels of fishing mortality by a minimum of 32% from average levels for 2006-2009, or equivalent to a minimum 39% reduction of the 2004 level in fishing mortality, and a 28% reduction of the average 2001–2004 levels.

3.2. 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:

- 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 & TRAFFIC call 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.

3.3. Pacific Bluefin Tuna

Recalling the CPC reports on CMM-2010-04 implementation at the seventh meeting of the WCPFC’s Northern Committee (NC-7),, there is considerable harvesting of Pacific Bluefin Tuna without implementation of the appropriate management measures that meet the required CMM conditions due to the current exemptions contained in the PBT CMM.

WWF & TRAFFIC call on WCPFC to remove all current exemptions from CMM-2010-04 by 2012, and all fishing nations to implement the substantial management measures for juvenile (age0-3) PBT to keep fishing mortality of PBT to no more than its 2002-2004 fishing mortality level.

3.4. South Pacific Albacore

WWF and TRAFFIC recognise the legitimate aspirations of SIDS to increase the value from tuna fisheries in their exclusive economic zones. There is however, considerable concern about the rapid growth in the longline fleet in the Western and Central Pacific. Of the total South Pacific Albacore (SPA) catch of 75,000 tonnes (2010), Chinese and Chinese Taipei catch has increased from 24,000 (2000-2004) to 53,000 tonnes.

This growth in effort is leading to localised depletion of the adult stock and the increased effort south of 20°S, on the juvenile migrating stock, is contributing to a reduction in biomass. This is occurring as the stock rapidly approaches MSY levels. The effectiveness of the Western and Central Pacific Fisheries Commission (WCPFC) Conservation and Management Measure (CMM) 2005-02, as amended in 2010, to protect the southern Albacore stock, is now questionable, albeit that the scientists still maintain that the stock remains within biological limits.

While recognising the legitimate aspirations of SIDS, within a robust and responsible sustainability framework to develop domestic fisheries – as required under CMM 2005-02/2010-05 - anecdotal industry evidence indicates that there is a serious problem with over-licencing in a number of WCPO SIDS.

WWF and TRAFFIC recognise the efforts that have been made to strengthen the management strategy for the albacore longline fishery . But there is an urgent need to introduce effective capacity limits and effort management for SPA.

4. Regional Observer Program (ROP)

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

- 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.

It is disappointing that very little progress on the above time table for implementation has been progressed or achieved. 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 are a priority revenue earner for many countries in the Pacific and as such must be given the recognition they deserve 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 & TRAFFIC consider the presence of observers on every fishing and support vessel as fundamental to fishing best practices and call for a comprehensive and strong Regional Observer Program with 100% coverage of all fishing vessels (including both catching and support vessels). WWF & TRAFFIC call upon the WCPFC to meet the 100% ROP target by 2013.

5. Catch Documentation Scheme

WWF & TRAFFIC consider 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 & TRAFFIC recognize 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 & TRAFFIC recommends the adoption of a CDS measure for at least the five key tuna species⁴ with a date of implementation to be agreed and:

- A. to the implementation of a CDS that requires documentation to accompany all catch harvested, landed, transshipped, traded domestically, exported, processed, imported and re-exported 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;
- B. that complementary measures are in place to maximize the effectiveness of the CDS by:
- C. ensuring that transshipment at sea does not compromise the effectiveness of the CDS;
- D. adopting Port State measures (consistent with the global Port State Measures Agreement) to take effect at the same time as the tuna CDS; and
- E. adopting measures that provide for trade-restrictions to be used against flag States with vessels on the IUU list.

⁴ Bigeye Tuna, Yellowfin Tuna, Albacore Tuna, Skipjack Tuna, Pacific Bluefin Tuna.

- F. acknowledging the need to implement CDS for other species of tunas, billfish and sharks managed by the Commission;
- G. 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;
- H. 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
- I. maximizing retailer and public access to CDS data through modern online tools.

6. Mitigation of Bycatch Impacts

WWF and TRAFFIC believe that WCPFC must:

- take immediate management action to avoid bycatch interactions and to mitigate the impact of those interactions;
- task the relevant scientific/ecosystem body to improve bycatch related information and strengthen the long-term management about bycatch levels and mitigation options;
- review and revise management actions on bycatch as information increases; and take action to strengthen their capacity to manage and monitor compliance with conservation and management measures.

A number of environmental NGOs (including WWF and TRAFFIC) have developed a Compendium (2011) best practice of Conservation and Management Measures (CMMs) for the bycatch species taxonomic groups. Four CMMs have been prepared, on the basis of the best available scientific advice and taking into account current practice within tuna RFMOs. The CMMs cover the following four taxonomic groups:

- Seabirds
- Sharks
- Sea turtles
- Marine mammals

6. Conclusion

The responsibility of the WCPFC is clearly laid out as is the expectation for the sustainable management of fisheries resources within its mandate. The lack of or need for strengthening certain measures are undermining sustainability in the WCPO and need to be addressed urgently. WWF & TRAFFIC call on the Commission to act quickly on the issues raised above for a sustainable future.

References:

Western and Central Pacific Fisheries Commission Convention (2004)

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

WWF (2011) WWF Position Statement to TCC 7, WCPFC-TCC7-2011-OB-05, Pohnpei, FSM, 28 September-04th October 2011

WCPFC Northern Committee (2011) Summary Report of the Seventh Regular Session of the Northern Committee (Adopted version), WCPFC, Sapporo, Japan, 6-9 September 2011

A Compendium of Conservation and Management Measures to address the impacts of species bycatch in tuna RFMOs (2011) http://www.hsi.org/assets/pdfs/joint_fisheries_bycatch_2011.pdf