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POSITION STATEMENT TO WCPFC15

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30 October 2018**

Organisation for the Promotion of Responsible Tuna Fisheries (OPRT)



OPRT

Organization for the Promotion of Responsible Tuna Fisheries

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October 29, 2018

Mr. Feleti P. Teo
Executive Director
Western and Central Pacific Fisheries Commission

Ensuring the effective Conservation and Management of Bigeye tuna in the Western and Central Pacific Ocean

Dear Mr. Teo;

It is an honor for me to communicate with you on behalf of the members of the Organization for the Promotion of Responsible Tuna Fisheries (OPRT) and to convey their views to you.

The OPRT membership includes associations representing large-scale tuna longline vessels with ultra-low-temperature freezers of a number of countries, associations representing distributors handling sashimi tuna in Japan, and a national liaison committee of consumer organizations in Japan. Our objective is to ensure that tuna fisheries are carried out in a responsible manner that includes restricting the total number of registered vessels.

Taking this opportunity, I would like to express our respect to you as Executive Director of the WCPFC. We look forward to the promotion of conservation and sustainable use of tuna and tuna-like species in the western and central Pacific Ocean (WCPO) under your leadership.

OPRT members have been deeply concerned about the current and future status of the bigeye stock in the WCPO, as mentioned in the letters addressed to you and your predecessor dated July 22, 2013, July 4, 2014, July 28, 2015, September 16, 2016 and October 3, 2017. The WCPO bigeye stock is of the greatest importance to our fisheries, distributing sectors and consumers.

In this connection, OPRT held its membership meeting in Tokyo on June 11, 2018 and exchanged views on results and methodologies of the new full assessment for the WCPO bigeye stock conducted by Scientific Committee in mid-August last year (SC13), and the contents of CMM 2017-01 which is effective for only 2018, paying special attention to the recovery of the bigeye stock in the WCPO. We also looked back at the results of previous stock assessments and contents of relevant CCMs for WCPO tropical tunas up to CMM 2016-01.

A year ago, we were greatly surprised to know the major outcomes from

SC13 with respect to stock assessment for the WCPO bigeye, and we are deeply concerned about the high level of uncertainty which SC13 itself admitted. We considered that there would be a high probability that irreparable damage to the WCPO bigeye stock would occur if CMMs are developed and implemented, according to information from the 2017 assessment for bigeye.

Therefore, we regretted and have been greatly concerned about the measures stipulated in CMM 2017-01 which was developed and adopted at WCPFC14 last December, employing the results of the 2017 assessments from SC13. Those measures were substantially weaker compared to those included in previous CMMs for tropical tunas.

However, we note that CMM 2017-01 is effective only for 2018 and that at the forthcoming Commission meeting (WCPFC15) a new CMM to be applied for 2019 and beyond will be developed.

We hope that the following views will be considered positively by you and the parties of the WCPFC and that they will be reflected in their work in preparation for and in deliberations at the forthcoming WCPFC15.

- 1. Because of the high level of uncertainties it is premature to develop and implement CMMs based on the new stock assessment. A truly precautionary approach should be applied.**

We consider that science must be respected in developing conservation and management measures for fish stocks including the WCPO bigeye stock. However, since August last year we have been deeply concerned about the results of stock assessments for the WCPO bigeye stock conducted at SC13 that contains a high level of uncertainties. Our concern has not been alleviated by looking at the outcome from SC14 held in August this year.

The level of uncertainty for the 2018 stock assessment associated with the growth curve and regional division is considered basically unchanged from the 2017 assessment. It is assumed that such uncertainties cannot be resolved immediately.

In addition, SC14 also noted that, regardless of the choice of uncertainty grid, the assessment results show that the stock has been continuously declining for about 60 years since the late 1950's, except for the recent small increase (paragraph 169. of Summary Report (SR) of SC14. This has amplified our concern.

We therefore again urge the Commission, in accordance with a precautionary approach, to refrain from taking actions based on the results of new assessments, which could lead to unrepairable damage to the WCPO bigeye stock.

More specifically, the work to reduce the uncertainties of new stock assessments associated with, *inter alia*, growth curve and regional division should be expedited as a matter of priority. Until the uncertainties included in these new assessments are adequately resolved, in developing a CMM, we should continue to rely on the previous full assessment that was conducted in 2014 at SC10 fine-tuned by the SC with updated information in the consecutive years up to 2016.

Addressing the issue in this manner is consistent with the provision of Article 5 (c) of the WCPFC Convention that *inter alia*, prescribes the application of the Precautionary Approach in establishing and implementing conservation and management measures for WCPFC tuna stocks.

[Major paragraphs from Summary Reports (SR) of SC related to the comments above]

- i) In the 2017 assessment SC itself admitted that high level of uncertainties exists in that assessment chiefly because of the introduction of the new growth curve and changed regional division (See: Paragraphs 232, 233 and 242: SR of SC13).
- ii) (However,) SC14 also notes that questions remain regarding the “updated new growth” model (paragraph 160: SR of SC14).
- iii) Paragraphs 183 and 184 of SR of SC14 that describe research recommendations consist of a multiple number of subparagraphs that suggest a wide range of work is necessary to cope with the high level of uncertainties included in the assessments conducted in 2017 and 2018.

2. FAD settings should be adequately managed through strengthened restrictions to allow recovery of the productivity of bigeye and yellowfin stocks

It is considered that restrictions set forth and implemented for purse seine setting associated with Fish Aggregating Devices (FADs) by WCPFC to date have not been adequate to maintain the productivity of the bigeye and yellowfin stocks and to prevent probable deterioration of, in particular, the bigeye stock.

We consider it necessary that management of purse seine settings associated with FAD should be strengthened in an effective manner for the following reasons:

Firstly, the deterioration of bigeye stocks is considered attributable to FAD settings that allow large catches of juvenile bigeye while the target is skipjack tuna. This recognition has been shared by scientific bodies of other RFMOs; and

Secondly, the SC has repeatedly suggested that the Commission consider measures to reduce fishing mortality from fisheries that take juveniles, with the goal to increase bigeye fishery yields and reduce any further impacts on

the spawning biomass for the stock in the tropical regions. The SC has also made the recommendation from the same viewpoint for the WCPO yellowfin stock.

Measures to be established reflecting this point will contribute to the increase in Y/R (Yield per Recruit) for bigeye and yellowfin stocks, and the promotion of conservation and rational use of these stocks.

[Relevant paragraphs]

- i) SC 14 (therefore) recommends that WCPFC15 could continue to consider measures to reduce fishing mortality from fisheries that take juveniles, with the goal to increase bigeye fishery yields and reduce any further impacts on the spawning biomass for this stock in the tropical regions. (Paragraph 179.: SR of SC14)
- ii) WCPFC could consider measures to reduce fishing mortality from fisheries that take juveniles, with the goal to increase to maximum fishery yields and reduce any further impacts on the spawning potential for this (the WCPO yellowfin) stock in the tropical regions (Paragraph 38 (255): SR of SC10 (Management advice including this is still most recent)).

3. Contributions from CCMs with major longline fleets should be duly considered

In the future deliberations to develop conservation and management measures and other related issues, the following fact should also be duly considered: 5 CCMs - China, Japan, Korea, Chinese Taipei and the USA (all except the USA have OPRT member associations) have major longline fisheries subject to the reduction schedule for bigeye catches by longline fisheries from 2014-2017 (Appendix F of CMMs 2013-01, 2014-01, 2015-01 and 2016-01). The relevant industries of longline fisheries have expended utmost efforts to reduce their catches in accordance with the catch reduction schedule regardless of whether the additional measures described for purse seine fisheries in the afore-mentioned CMMs are actually implemented or not. These endeavors by those longline industries are expecting the implementation of further effective restrictions on purse seiners' FAD settings which should lead to the reduction in fishing mortality of bigeye tuna by purse seine fisheries to realize the recovery of the WCPO bigeye stock.

4. Work to develop a Harvest Strategy (HS) for the WCPO skipjack should, duly consider the promotion of conservation and management of the WCPO bigeye and yellowfin stocks

As described in points number 1 and 2 above, because purse seine operations associated with FADs have significant impacts on the WCPO bigeye and yellowfin stocks, it would be inappropriate if work to develop a HS for the WCPO skipjack within the WCPFC does not give due

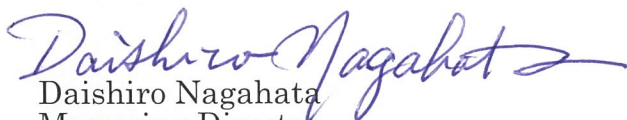
consideration to possible implications on the WCPO bigeye stock and related fisheries.

In this regard, careful deliberations should be conducted by utilizing the Management Strategy Evaluations for skipjack, and bigeye and yellowfin in the WCPO.

Your attention and cooperation is appreciated.

We hope that WCPFC15 will be a fruitful meeting accommodating the points mentioned above.

Best regards

A handwritten signature in blue ink, reading "Daishiro Nagahata", with a stylized flourish at the end.

Daishiro Nagahata
Managing Director
OPRT