



**COMMISSION
FIFTEENTH REGULAR SESSION**
Honolulu, Hawaii, USA
10 – 14 December 2018

VIEWS ON PARAGRAPHS 28 AND 44 OF CMM 2017-01

**WCPFC15-2018-DP09
13 November 2018**

FFA Member CCMs



9 November 2018

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

Dear Feleti,

Views of FFA members on paragraphs 28 and 44 of CMM 2017-01

I write on behalf of the 17 members of the Forum Fisheries Agency in my capacity as the Chair of the Forum Fisheries Committee. These views expressed in this letter are without prejudice to the further development of positions and proposals by FFA members individually or collectively.

One of the matters requiring attention over the next two years are the requirements in paragraphs 28 and 44 of the Tropical Tuna bridging measure to agree hard limits on both the high seas purse-seine fishery and on bigeye caught by longliners, and a process of allocating these limits: for purse-seine by 2019 and for longline by 2020.

Along with the application of the Harvest Strategy Approach, we consider this to be one of the most important matters facing the Commission in its job of adding value to the management of tuna in the tropical region, and we want to make sure that it receives due consideration. We have long advocated for improved management of the high seas, and consider the establishment of high seas limits a critical step in ensuring the biological and economic sustainability of the tropical tuna stocks in their entirety.

Firstly, we would note our clear understanding that the decisions required by paragraph 28 will be made at WCPFC16, and those required by paragraph 44 would be made at WCPFC17. FFA members propose that the Commission concentrate on management of the high seas purse-seine fishery in 2019, and dedicate sufficient time and attention to this matter to enable decision at WCPFC16 including on a framework for allocation. In this vein, we ask that the Commission provide a dedicated opportunity for all members to have preliminary discussions on paragraph 28 perhaps in an informal workshop setting in advance of WCPFC16.

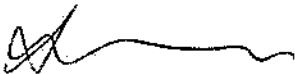
As reflected in the reference to Article 8 of the Convention in paragraphs 28 and 44, FFA members expect that the principle of "compatibility" will be one of the central considerations in this process. As such, FFA members' expectation is that both high seas purse-seine and longline limits and allocations should recognise and be compatible with zone-based measures, and (consistent with Article 7 of UNFSA) that the measures established in the high seas will not undermine the effectiveness of the robust arrangements that have been established in EEZs. It will also be important to ensure that all limits are consistent with achieving established TRPs and LRPs.

As recognised in Article 10(3)(d) of the Convention, small island developing States and territories are overwhelmingly dependent on the exploitation of marine living resources. FFA members encourage all CCMs to view this process as we do, as an opportunity to finally deliver on the requirements of Article 119 of UNCLOS, which places the special interests of developing States as a fundamental

consideration in determining allowable catch and conservation measures for resources in the high seas, and Article 25(1)(b) of UNFSA which mandates States to cooperate to enable developing State participation in high seas fisheries. FFA members would like to invite all CCMs to share views on a constructive process, over the coming year, that will allow the Commission to meet the commitments in CMM 2017-01 to establish high seas limits and an allocation framework for purse seine in 2019, and a longline bigeye limit and allocation framework in 2020.

We look forward to the deliberations in Honolulu and would greatly appreciate if you could please make this letter available to other CCMs.

Yours Sincerely



Tapaeru Herrmann

Chair

Forum Fisheries Committee