August 31, 2012

Dear WCPFC Northern Committee delegate,

I am writing on behalf of the Pew Environment Group, in regards to the discussions that will take place at the upcoming Western and Central Pacific Fisheries Commission (WCPFC) 8th Regular Session of the Northern Committee, to take place from the 3-6 September in Nagasaki, Japan.

The Pew Environment Group would like to thank the Northern Committee (NC) for the opportunity to participate in NC 8 as an observer. We look forward to engaging in this Committee's important work as it recommends conservation and management measures for the so-called "northern stocks", including Pacific bluefin tuna. We are particularly interested in discussions regarding how to strengthen CMM 2010-04 based on the expected 2012 Pacific bluefin tuna stock assessment. We are therefore extremely disappointed that the assessment was not finalized according to schedule and thus failed to provide the updated science on which this body could base its CMM deliberations.

Despite ample time and extensive effort, including a week-long data preparatory meeting and a two-week long assessment, the International Scientific Committee for Tuna and Tuna-like Species in the North Pacific Ocean (ISC) failed to reach consensus on the assessment model. This stalemate and resulting inability to provide updated scientific advice to the NC is especially concerning given that the 2010 assessment indicated Pacific bluefin tuna are subject to overfishing and may even be overfished. Furthermore, based on preliminary modeling and analysis of CPUE trends during the attempted 2012 assessment, the ISC Plenary expressed concern that the condition of the stock may have deteriorated even further since the 2010 assessment.

The ISC's lack of transparency, as evidenced by its refusal to share full assessments with the public or admit non-governmental observers to meetings, is not consistent with the high standards under which WCPFC operates. We urge the NC to issue a formal statement of concern to the ISC for not producing an updated assessment. Additionally, the NC may wish to consider whether it is wise to rely on the ISC to assess northern stocks going forward. Alternatives could be explored at this meeting, such as enlisting the Secretariat of the Pacific Community (SPC) to assess the stock consistent with its role as the scientific provider for the WCPFC.

Even though a final stock assessment is not available, the NC must provide new advice on CMM 2010-04 since the measure only provides guidance through 2012. The effectiveness of this CMM is called into question based on the preliminary scientific evidence showing further population declines and provisional 2011 CCMs (members, co-operating non-members, and territories, collectively) landings reports that exceed the 2002-04 average. These reported figures, combined with CCMs’ concerns that underreporting may be a problem and juvenile catches remain too high, suggest that further actions are needed to strengthen the CMM.

CMM 2010-04 would be significantly strengthened by implementing science-based catch limits. In the eastern Pacific, the Inter-American Tropical Tuna Commission (IATTC) adopted a two-year 10,000 mt hard catch limit for Pacific bluefin tuna at its June 2012 meeting and the fishery was closed in August when the quota was reached. The WCPFC should adopt a parallel measure for the western region of the Pacific bluefin's range.

The Pew Environment Group calls on the Northern Committee to recommend a revised CMM that includes the following:

* A catch limit less than 15,567 mt (the 2002-04 average catch of Japan, Korea, and Chinese Taipei) for 2013, in line with the scientific advice to reduce fishing mortality to below the 2002-04 level;
* A 30 kg minimum size limit, with a 40% tolerance for undersized fish; and
* No exemptions for any CCMs.

The first two elements would strengthen paragraph 2 of CMM 2010-04 and should be revisited at NC 9 when the updated stock assessment is available.

We wish the Northern Committee the best for a productive meeting and emphasize the NC’s critical role in the WCPFC process.

Sincerely,



Amanda Nickson

Director, Global Tuna Conservation Campaign

Pew Environment Group