



**DEVELOPMENT OF A NEW TROPICAL TUNA MEASURE
WORKSHOP 2 (TTMW2)
Electronic Meeting
6-10 September 2021**

FFA SUBMISSION TO THE 2ND WCPFC WORKSHOP ON THE TROPICAL TUNA MEASURE

**WCPFC-TTMW2-2021-DP02
1 September 2021**

Paper submitted by FFA CCMs



FFA

31 August 2021

Ms Jung-Re Riley Kim
Chair
Western and Central Pacific Fisheries Commission
PO Box 2356, Kolonia
FEDERATED STATES OF MICRONESIA

Dear Ms Kim,

FFA submission to the 2nd WCPFC workshop on the Tropical Tuna Measure

I write on behalf of the 17 Members of the Pacific Islands Forum Fisheries Agency to thank you for arranging the second WCPFC workshop on the Tropical Tuna Measure, and to provide FFA views on elements of the WCPFC Tropical Tuna Measure. This submission is without prejudice to long-standing positions of FFA Members individually or collectively.

General

FFA Members continue to advocate a precautionary approach to changes to the current measures in the CMM, for reasons that have been noted before. The current CMM is working well. The 3 key tropical tuna stocks are all being maintained in a healthy condition. The measures in the CMM continue to achieve the objectives for these key tuna stocks and are projected to continue to achieve those objectives. The current assessments of the stocks are positive but the Commission needs to take into account the uncertainty in those assessments, particularly for bigeye and yellowfin.

Critically, the CMM is delivering benefits to our economies, which is more essential now than ever before following the impacts of COVID-19. In our view, the current CMM provides essential support to our economic security and livelihoods in addition to representing effective and proven fisheries management and therefore serves as the starting point for the discussions on a revised CMM. The Commission should be cautious about changing measures that are working well.

Balance of interests

FFA Members attach a high priority to maintaining the current balance of interests between fisheries and between CCMs in relation to conservation burden in the current Tropical Tuna CMM. This balance has been achieved after many years of careful and considered development, and any changes will need to ensure that the overall balance of the measure is maintained.

Management Objectives

FFA Members continue to support the CMM as a bridge to the adoption of harvest strategies for bigeye, skipjack, and yellowfin tuna stocks in the manner laid out in the Harvest Strategy Workplan, and attach high priority to making progress in harvest strategy work in 2022.

We note that a number of CCMs are advocating further investigation of suitably balanced adjustments that would be consistent with the current objectives in CMM 2020-01. Given the circumstances and challenges of virtual negotiations, FFA Members support this approach as the most likely to provide a mutually acceptable outcome which maintains the sustainability of our valuable fisheries while we focus on development of harvest strategies.

In considering any changes to the measure, we take the advice of the Scientific Committee very seriously and, following the technical concerns raised by the SC17, note there will be an independent review in 2022 of the stock assessments for yellowfin tuna, which will also be relevant to the bigeye tuna assessment. Until the outcomes of this review are available, any revisions to the Measure need to be suitably cautious.

BET Management Objective: FFA Members support maintaining the bigeye Management Objective in the current CMM.

YFT Management Objective: FFA Members support maintaining the yellowfin Management Objective in the current CMM.

SKJ Management Objective: FFA Members maintain their previous position on the wording of the management objective for Skipjack, based around maintaining the fishery at 2012 levels, both in terms of biomass and the level of fishing effort as follows: “Maintain spawning biomass at the 2012 levels, on average, and maintain effort across the fishery at a level consistent with the level of purse seine fishing effort for skipjack in 2012.”

Purse seine provisions

Reviewing the annotated agenda for the Workshop, FFA Members note what appears to be a bias, conscious or unconscious, against the current management arrangements for the purse seine fishery. Specifically, agenda items 5.1.1 and 5.1.2 refer to considering “the continued relevance of zoned-based purse seine effort control in paragraph 25 of CMM 2020-01” and “the continued relevance of high seas purse seine effort controls in paragraphs 26, 28, and 30 of CMM 2020-01”. As all CCMs should well appreciate, the arrangements in these paragraphs are of the highest relevance to FFA Members, and we ask that this wording be removed from the annotated agenda for the Workshop.

With regard to the provisions of paragraph 26 and 28 of CMM2018-01, FFA Members continue to place high priority on the need for a hard limit to be applied to purse seine effort on the high seas and for the development of an allocation framework that adequately takes into account Articles 8, 10 (3) and 30 of the Convention and we ask that the provisions of paragraph 28 be rolled over to the new CMM.

FAD Management

FFA Members support maintaining the 3-month FAD closure in its present form as part of taking a precautionary approach to the development of a new CMM. The FAD closure is one element in the package of measures to conserve bigeye tuna in the CMM, and the balance in conservation burden between the purse seine and longline fisheries and CCMs in that package needs to be maintained. FFA Members support the removal of paragraph 18 which is now redundant. However, we stress that the FAD definition and footnote 1 must be retained as integral elements of the FAD closure.

FFA Members support making the requirements for the use of non-entangling material in the construction of FADs mandatory, including banning the use of mesh netting. FFA Members also support the adoption of mechanisms for identifying individual FADs as an important step towards improving knowledge about FADs that are washed up on reefs and beaches. We support further scientific studies into the development and application of appropriate biodegradable materials in FAD construction as well as continued research which may inform decisions relating to the optimum number of deployed FADs.

Longline provisions

FFA Members reiterate our long-standing position to transition away from the current flag-based limits to zone-based management, in order to give greater recognition to sovereign rights in our EEZs.

In this regard, FFA members advise that flag based long line bigeye catch limits will not apply in FFA Member waters. Longline fishing in FFA Members waters will be managed through zone-based management arrangements, including the PNA Longline Vessel Day Scheme.

MCS related provisions

FFA Members will be looking to incorporate a range of longline monitoring related elements into the new Tropical Tuna CMM. These include:

- a) High seas entry and exit reporting.
- b) E-Reporting of logsheet data (relating to high seas fishing) to apply from 1 January 2023.
- c) Bigeye catch verification via Catch Documentation Scheme to the first point of sale to be referred to TCC.
- d) Commitment to establish E-Monitoring requirement to supplement coverage by human observers.
- e) Transshipment reform.

SIDS Special Requirements and CMM2013-06

Finally, of highest priority for FFA Members is the full recognition of the special requirements and interests of Pacific Small Island Developing States who are highly dependent on the regional tuna resources. Specifically, the TTM needs to reflect the responsibilities of the Commission under Article 30 of the Convention and the requirement for all proposals to be considered in accordance with the provisions of CMM 2013-06. Paragraph 3 of CMM 2013-06 provides that in considering any new proposal the Commission is required to consider the questions set out in that paragraph in order to determine the nature and extent of the impact of the proposal on SIDS and territories in the Convention Area.

We also wish to remind members that the intent of Article 30 and CMM2013-06 is to ensure that the outcomes of any measure do not have a detrimental impact on the development aspirations of SIDS. We ask all CCMs to keep this at the forefront of their minds when working through the requirements of CMM2013-06.

The responsibility for undertaking a CMM 2013-06 assessment rests with the proponent of a new proposal, regardless of the form in which the proposal is made. We welcome consultations with other CCMs to give this effect and will not consider any proposal that does otherwise.

FFA Members look forward to engaging with other CCMs during the upcoming workshop, with your guidance and leadership.

Yours sincerely,



G.P.N Baleinabuli

FFC Chair and Permanent Secretary for Forests and Acting Permanent Secretary for Fisheries

CC: Mr. Feleti Teo, OBE, WCPFC Executive Director