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FFA MEMBERS POSITIONS ON KEY ISSUES FOR WCPFC18

**WCPFC18-2021-DP04
29 October 2021**

FFA Member CCMs



FFA

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Ms Jung-Re Riley Kim
Chair
Western and Central Pacific Fisheries Commission
PO Box 2356, Kolonia
Pohnpei
Federated States of Micronesia

Dear Chair,

FFA MEMBERS POSITIONS ON KEY ISSUES FOR WCPFC18

I write on behalf of the 17 members of the Pacific Islands Forum Fisheries Agency to share our position on key issues for the 18th session of the Commission. This is without prejudice to the positions of FFA members individually or collectively.

Tropical Tuna measure

As we have underlined in the past, FFA members will only support a cautious approach to changes to the current provisions in the Conservation and Management Measure (CMM) because, in addition to meeting its objectives, the current CMM already takes into account the best available scientific advice that while the status of the bigeye and yellowfin stocks is healthy, following the most recent changes that were made to the CMM in 2017 when the 4th month FAD closure was removed and the high seas FAD closure was reduced, there remains a need for a precautionary approach, especially noting the uncertainty in the assessments for these stocks. As FFA members have continued to highlight throughout this year, Pacific Islands economies are dependent on the tuna fishery and we cannot support actions that will jeopardise the stocks that we rely upon.

FFA Members have engaged vigorously at the two Tropical Tuna Measure workshops, as would be expected for an issue of such importance to us, and we express our appreciation to you, Chair, for organizing these important opportunities to discuss the elements of this Commission's key Conservation and Management Measure with other WCPFC Members, Cooperating Non-members and Participating Territories (CCMs).

We have made a number of suggestions with regard to revising the Tropical Tuna Measure during the workshop series and details of these can be found collated in the WCPFC Chair's Consultative Draft of the Tropical Tuna CMM.

Most importantly, in recognition of the sovereign rights of FFA Members who have established national longline limits under national laws with robust monitoring and management systems in place to implement these, FFA Members advise that longline fishing within our exclusive economic zones will be managed only through zone-based management, including the LL-VDS. FFA Members will no longer recognise any flag-based bigeye limits as applying to our zones. FFA members also emphasise the ultimate intention, as proposed in the text provided in relation to paragraph 44 of the revised CMM, to transition towards an equitable framework for allocation of high seas fishing opportunities in the bigeye longline fishery.

To sum up the basis for our proposed changes, FFA members attach high priority to maintaining the current careful balance of interests between fisheries and CCMs which has been achieved after a lengthy period of careful and considered development. If there are to be changes within the CMM, that balance needs to be maintained. Additionally, we take the advice of the Scientific Committee very seriously and insist on a cautious approach to any changes to the existing measures. We also note that, following the significant technical concerns of the SC, there will be an independent review in 2022 of the stock assessments for bigeye and yellowfin tuna and until the outcomes of this review are available any revisions to the Measure need to be suitably precautionary.

South Pacific albacore

FFA members wish to convey our strong concerns in relation to the situation facing the South Pacific albacore stock. These concerns arise from the following factors:

- The necessity for strong management action by the Commission to rebuild the stock to support the economic viability of fleets, especially Pacific Islands domestic longline fleets;
- The latest stock assessment for South Pacific albacore which suggests that the stock status has continued to decline in recent years and that, without immediate cuts in catch and effort, the conditions under the TRP will not be achieved;
- Recent shift of effort from the tropical longline fishery resulting in increased targeting of South Pacific albacore by DWFNs on the high seas;
- The current measure is not effective in restricting catch and effort for SPA, as was clearly demonstrated during the CMR process at TCC17.

In light of these factors, FFA members call for immediate action by WCPFC18 to avoid further declines in the South Pacific albacore stock while work continues on a revised CMM for South Pacific albacore. Specifically, FFA members call for an immediate freeze in catch and effort for South Pacific albacore by CCM vessels operating on the high seas south of the equator.

FFA members also wish to signal our intention to bring forward a revised South Pacific albacore CMM for consideration in 2022. We reiterate our commitment to the implementation of zone-based management arrangements for longline fisheries within our waters and will be seeking compatible limits on catch and effort for South Pacific albacore on the high seas.

Compliance Monitoring Scheme

FFA Members have expressed significant concerns regarding the operation of the Compliance Monitoring Scheme (CMS) for a number of years now. These concerns include:

- The imbalance in the operation of the CMS between purse seine and longline obligations - arising from deficiencies in certain areas of the Commission's management frameworks for these fisheries, particularly unfair focus and scrutiny on fisheries and fleets with better monitoring and reporting;
- The significant amount of time spent on the CMR process each year;
- The distortion of the CMS as a vehicle for prosecuting individual vessel infringements rather than for its intended purpose of identifying gaps and failures in the implementation of CMMs and putting in place steps to address those issues.

The current CMS CMM contains specific elements that seek to address some of these concerns (for example, the Purpose, Principles and Future Work sections of the measure). These CMS elements have been agreed by all CCMs, therefore highlighting their importance and CCMs' commitment to their implementation. FFA Members have taken the lead in seeking to address this work. We have invested significant time and effort to lead work on audit points and the development of a risk-based assessment framework, and we have championed the development and use of aggregated tables with the support of the WCPFC Secretariat. However, due to a range of reasons, essential CMS work is still incomplete. In this context, rather than investing further time in the implementation of the current measure, FFA members suggest the WCPFC focuses its collective efforts on progressing the critical suite of future work which will ensure that future implementation of the CMS will achieve the purpose, goals and principles that the Commission committed to in adopting CMM 2019-06.

Labour Standards

The issue of crew safety, including poor working conditions, mistreatment of fishing crew and allegations of forced labour, has remained in the spotlight throughout 2021. The development of a CMM on labour standards for fishing crew remains a priority for FFA Members as reflected by our active participation in the inter-sessional working group. While FFA Members recognise that a significant amount of work has been done to develop the CMM, we recognise that there are a number of issues that still need to be worked through. We attach significant importance to improving the safety and working conditions of crew on board vessels fishing under the WCPF Convention. Crew play an integral role in the economic security of this region. We want to ensure the WCPFC treats this issue seriously, and FFA members are prepared to continue investing the time to do so throughout 2022.

Nomination of Officers

FFA Members have the honour to nominate Dr. Tuikolongahau Halafihi, Chief Executive Officer of the Ministry of Fisheries of the Kingdom of Tonga as the Chair of the Scientific Committee.

Chair, we stand ready to work with you and other CCMs to ensure that the Commission progresses conservation and management efforts at its meeting this year.

Your sincerely,



G. P. N. Baleinabuli
FFC Chair and Permanent Secretary for Forests and Acting Permanent Secretary for Fisheries

cc: Mr Feleti Teo, Executive Director, WCPFC.