



COMMISSION

FIRST SOUTH PACIFIC ALBACORE ALLOCATION WORKSHOP

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Wellington, New Zealand (Hybrid)

RATIONALE FOR THE FFA SPA EEZ-HS ALLOCATION PROPOSAL

WCPFC-SPAA01-2026-DP02_suppl

25 June 2026

Submitted by FFA Member CCMs

Rationale for the FFA SPA EEZ-HS allocation Proposal

FFA Members recognise that historical catch is an important consideration in allocation discussions. However, Article 10.3 of the WCPFC Convention was specifically negotiated to ensure that allocation decisions are not determined solely by historical utilisation. Instead, the Convention requires consideration of a broader range of factors, including the needs of Small Island Developing States (SIDS), contributions to conservation and management, coastal community dependence, compliance performance, and the fishing interests and aspirations of coastal States.

The legal, economic, social and stewardship arguments advanced by FFA Members are therefore not separate from Article 10.3; rather, they form the basis of the criteria reflected in Article 10.3 itself. Accordingly, these considerations should be taken into account both qualitatively and quantitatively when assessing an appropriate EEZ allocation outcome.

To illustrate how Article 10.3 may inform the EEZ/HS split discussion, FFA Members have developed the indicative framework presented in Table 1. The framework applies all ten Article 10.3 criteria and assigns indicative EEZ and High Seas shares to each criterion based on the extent to which that criterion supports coastal State or high seas interests. The relative values assigned to each criterion are informed by the legal, economic, social and biological considerations described below.

When applied collectively, the framework produces an indicative allocation outcome of approximately 80% EEZ and 20% High Seas.

By comparison, historical catch average (period 2000-2024-WCPFC SPAAW01-IP01) for South Pacific albacore at approximately 60% EEZ and 40% High Seas.

The FFA proposal of 75% EEZ provides a balanced and moderate position that recognises both historical participation and the broader legal, economic, social and stewardship considerations reflected in Article 10.3.

Table 1: Weighted approach using Art10.3 criteria with corresponding justifications. Catch history references are based on the approximate average of catch history from 2000-2024 based on SPAAW01-IP01.

Article 10.3 Criterion	EEZ	HS	Justification
(a) Status of stocks and existing level of fishing effort	65	35	Most South Pacific albacore catches, fishing effort and fisheries activities occur within EEZs, although a significant proportion of the fishery also occurs on the High Seas. SPAAW01-IP01 shows catch history ⁽²⁰⁰⁰⁻²⁰²⁴⁾ averages around 60%, Historical ⁽²⁰⁰⁰⁻²⁰²⁴⁾ Average of hooks at 66% and historical ⁽²⁰¹⁰⁻²⁰²⁴⁾ VMS days 74% for EEZs. The healthy status of the stock reflects the long-term effectiveness of fisheries management throughout its range, with the majority of fishing activity occurring within coastal State jurisdictions. Accordingly, the weighting assigned to this criterion broadly reflects the observed spatial distribution of the fishery while recognising the continuing importance of the High Seas component.
(b) Fishing patterns and domestic consumption	70	30	Fishing patterns remain primarily linked to EEZ access and coastal State fisheries, although High Seas fishing also contributes to overall participation. Domestic consumption benefits are predominantly associated with coastal States. The data shows that fishing activity is primarily linked to EEZs—that is where most of the vessels go, where most of the effort occurs, and where most of the catch is taken. This weighting reflects that observable reality. SC20-2024-SA-IP-01
(c) Historic catch	60	40	Historical ⁽²⁰⁰⁴⁻²⁰²⁴⁾ catches south of 10°S have averaged approximately 60% within EEZs and 40% in the High Seas. The weighting is consistent with the long-term distribution of catches (SPAAW01-IP01).

(d) Needs of SIDS and territories 80

20 The economic, food security and development needs recognised under Articles 10.3(d) and Article 30 are primarily associated with coastal States whose economies depend directly on marine resources and access revenues. The WCPFC Convention Area is predominantly made up of the EEZs of coastal SIDS and territories, and these zones contain the resource base on which our economies and communities depend. Revenue derived from access to these fisheries remains a significant source of national income for many SIDS. In 2024, access fees to FFA Members waters was estimated at around USD502million and for some of our SIDS, this makes up over 70% of their contribution to national revenue. In 2024, total export value from FFA Members to key markets was around USD1.2 billion. These revenues support essential services including hospitals, schools, and other public services. Tuna and associated fisheries also contribute to domestic food security, local employment and economic resilience.

In this context, the weighting attributed to this criterion reflects the primary dependence of coastal SIDS and territories and the benefits generated from resources occurring within their EEZs. Participation in high seas fisheries also remains relevant, including as part of broader regional fishing activity and development aspirations. However, such participation is secondary to the fundamental importance of EEZ-based fisheries to the economies and wellbeing of SIDS and territories. Greater weight is therefore given to the needs of those members for whom the fishery is integral to economic development, food security and social stability, consistent with this criteria.

(e) Contributions to conservation and management	90	10	<p>Coastal States bear the overwhelming share of management, monitoring, compliance and enforcement responsibilities. FFA Members have actively managed WCPO tuna stocks across our EEZs since 1982 through Harmonised Minimum Terms and Conditions. FFA Members have maintained the prominence of formulating conservation and management measures and compatible measures, particular across the South Pacific. Through compatible and cost-effective measures, we have incorporated existing MCS systems and tools giving the Commission the advantage of using operational systems. This includes the FFA VMS, Pacific Islands Regional Fisheries Observer Programme, data standards and rules, boarding and inspection, and scientific services through our Pacific organisations. The Commission's data holdings, in particular operational level catch and effort data, has predominantly and historically been provided by coastal states, with other CCMs only recently taking up this practice. Most of the Commission's scientific research is supported within coastal states and territories EEZs including tuna tagging, biological sampling collected by our observers and port samplers, and providing the opportunity for researchers from various countries to utilise data and materials from fisheries in our EEZs. High Seas governance exists but is deficient compared to EEZ based management efforts, and largely dependent on the stewardship and investment of coastal States.</p>
(f) Record of compliance	70	30	<p>Compliance obligations apply across both EEZs and the High Seas. However, compliance performance is generally supported by stronger monitoring, licensing and enforcement frameworks within EEZs, warranting a higher EEZ weighting. In line with efforts to leverage robust national and sub-regional level management to strengthen management at the Commission level and on the high seas. Coastal states consistently demonstrate high levels of compliance with agreed WCPFC rules, evidenced through good compliance records under the WCPFC compliance</p>

scheme (*WCPFC21-2024-fCMR*, *WCPFC22-2025-fCMR*). Coastal state fisheries generally represent significantly higher levels of independent observer coverage (whether through the ROP, or national programmes including EM programmes; see *WCPFC-TCC21-2025-IP03 Annex 1*) compared to high seas fisheries. Greater levels of confidence in in-zone compliance associated with stronger independent monitoring as well as other relevant MCS tools implemented through national and subregional licensing requirements such as in-port inspections, in-port transshipment.

(g) Needs of coastal communities dependent on the stock	100	0	Coastal communities exist within coastal States, not on the High Seas. The social, cultural, food security and livelihood benefits recognised by this criterion are entirely linked to EEZ-based States and territories. Fishing is far more economically and strategically important to most SIDS than it is to most other WCPFC members whose economies are much less dependent on tuna from the WCPO. A clear example is from the FAO (2022) report that tuna accounts for 50-90% of animal protein intake for Pacific SIDS. For this reason, the needs of coastal communities dependent on the stock was scored 100.
(h) Special circumstances of a State surrounded by EEZs and with limited EEZ of its own (Samoa)	100	0	This criteria was specifically included to recognise geographic disadvantages relating to EEZ access. It is fundamentally a coastal-State consideration and therefore strongly favours EEZ interests, while still acknowledging that High Seas access may provide some mitigation.

(i) Geographical situation of non-contiguous SIDS separated by areas of High Seas. (Kiribati,)	90	10	This provision recognises the unique circumstances of Pacific island States whose jurisdictions are dispersed across large ocean areas. The criterion is intended to address challenges arising from geography and connectivity between EEZs rather than to reward High Seas fishing activity itself. WCPFC tropical tuna measures have consistently recognised the “geographical situation of non-contiguous SIDS separated by areas of high seas”, reinforcing that certain high seas areas are functionally connected to SIDS EEZs. This formulation complements the concept of adjacency by acknowledging that, for some coastal states, high seas areas may lie between parts of their EEZs, effectively extending adjacency beyond simple boundary proximity.
(j) Fishing interests and aspirations of coastal States	90	10	The criteria explicitly refers to the interests and aspirations of coastal States. It therefore directly supports EEZ-based participation, development and future opportunities and has little equivalent High Seas component. SIDS have real fishing interest as this is fundamental to their livelihood and the economies of their countries and territories. Opportunities to develop fishing fleets and capability, provide fishery access, establish onshore processing and local market supply, employment and food security supports coastal states development interests, and tangible participation in the fishery. Greater weight must be given to SIDS EEZ as this protects their aspirations and gives SIDS the opportunity to realise their fishing aspiration as and when they are able.

Then calculate the simple average:

EEZ

$$\frac{65 + 70 + 60 + 80 + 100 + 70 + 100 + 90 + 90 + 90}{10}$$

Sum:

$$65 + 70 + 60 + 80 + 100 + 70 + 100 + 90 + 90 + 90 = 815$$

Average:

$$\frac{815}{10} = 81.5$$

High Seas

$$\frac{35 + 30 + 40 + 20 + 0 + 30 + 0 + 10 + 10 + 10}{10}$$

Sum:

$$35 + 30 + 40 + 20 + 0 + 30 + 0 + 10 + 10 + 10 = 185$$

Average:

$$\frac{185}{10} = 18.5$$

The FFA proposal is supported by five interrelated justifications:

1. *Sovereign Rights and Stewardship Responsibilities (UNCLOS Article 56, 61-62)*

Coastal States exercise sovereign rights over living marine resources within their EEZs and bear the primary responsibility for managing, monitoring and conserving those resources. Pacific SIDS have invested heavily in fisheries governance, monitoring systems, compliance frameworks and regional management arrangements that have contributed directly to the sustainability of the fishery.

2. *Special Requirements of SIDS (WCPFC Convention Articles 10(3)(d) and 30; UNFSA Article 24 - 26)*

The WCPFC Convention explicitly requires recognition of the special requirements of SIDS. Pacific Island economies, food security systems and livelihoods are uniquely dependent on fisheries resources and therefore warrant particular consideration when determining allocation outcomes.

3. Economic Dependency and Food Security

For many Pacific SIDS, tuna fisheries generate substantial government revenue and provide a critical source of food security and employment. The significance of the fishery to Pacific coastal communities is substantially greater than its relative contribution to most DWFN economies.

4. Climate Resilience and Allocation Stability

Scientific analyses presented by SPC and considered through WCPFC processes indicate that climate change is already and will continue to alter the distribution of Pacific tuna, such as South Pacific albacore, including the proportion of biomass occurring within EEZs and adjacent high seas areas. Such projections create uncertainty regarding the future spatial distribution of the stock and highlight the need for allocation arrangements that remain robust under changing environmental conditions.

FFA Members maintain that climate-driven changes in stock distribution should not automatically result in corresponding changes in allocation outcomes. Coastal States will continue to bear the responsibilities associated with fisheries management, monitoring, compliance and stewardship within their EEZs irrespective of future distribution shifts. Allocation arrangements should therefore provide stability and resilience for Pacific SIDS while recognising the disproportionate economic impacts that climate change may have on their fisheries-dependent economies, considering the climate crisis is one to which Pacific SIDS have contributed negligible to.

5. Biological Contribution

South Pacific albacore is a straddling stock whose productivity and sustainability are closely linked to habitats located within coastal State EEZs. Allocation arrangements should therefore recognise the central role that EEZs play in supporting the biological productivity, management and long-term sustainability of the stock.

Selected timeframe considerations

The FFA uses the average historical catch over a 25-year period because it provides a stable and representative picture of participation in the fishery, while recognising the longstanding role of coastal States in supporting, managing and conserving the stock. This approach captures the substantial investments made by coastal States in fisheries governance, monitoring, compliance, scientific programmes and regional management arrangements, and gives effect to the stewardship responsibilities, development constraints and special requirements of SIDS recognised under Articles 10.3 and 30 of the Convention. It also helps ensure that allocation outcomes are not unduly influenced by more recent fishing patterns or climate-driven shifts in stock distribution, which may not adequately reflect the long-term rights, interests and responsibilities of coastal States whose waters have historically sustained the fishery.