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ADDENDUM

COMMENTS OF THE IATTC SCIENTIFIC STAFF OF JAPAN'S COMMENTS AND  
PROPOSAL ON THE IATTC MINIMUM STANDARD DATA FIELDS  
(LONGLINE OBSERVER PROGRAMS)

On December 27, 2017, Japan submitted to the IATTC a set of [comments](#) on the portion of the IATTC Longline Observer minimum Data Fields that were adopted by SAC-08. These comments were accompanied by a proposal to amend a number of those fields on the grounds that they are inconsistent with the corresponding WCPFC standards. In support of its proposal, Japan noted that the purpose of adopting longline observer minimum data standards that were based on those already in place at WCPFC was to facilitate consistency for what would need to be collected by observers on longline vessels that fish in both convention areas.

In light of this proposal, the IATTC staff wishes to offer the following comments only to facilitate an informed and productive discussion by the SAC.

It should be recalled first that, when the IATTC staff reviewed the WCPFC data standards in order to include them in the [proposal](#) to be considered by SAC-08, it was deemed necessary to edit the wording of many of the fields primarily with the goal of increasing clarity, but without changing the substantive requirement. However, in some instances, the modifications thus introduced may have expanded the scope of the field, but not in ways that would create inconsistency problems with the WCPFC counterpart standard.

The comments below refer to specific data fields that can be found in the comments table (Attachment 1 to [Japan's document](#)) and corresponding table that contains the proposals for amendment (Attachment 2 to Japan's document). The comments table begins on page 10 of their submission and the proposal for amendment on page 16.

Fields proposed for amendment:

**Fishery information service-** The WCPFC only requires recording presence/absence of a fishery information system. The corresponding IATTC field asks that the information service used be listed. This would be a one-time entry to be recorded at start of each trip and would not add to observer data duties

during sets. However, this is an instance where the substance of the field was altered by the change that was introduced.

**Branch line material(s)**- The IATTC version of this field includes language that says, “*If different types are used in different branch line positions, please describe.*” It was not obvious to the IATTC staff that this addition represents a departure from the WCPFC standards, but rather was considered a clear articulation of the likely intent of these standards. That is, if knowing the branch line materials is to be valuable, it seems logical that it would be useful to know in which branch line positions those different materials were used. Otherwise, if multiple material types are present and this field merely contains a list of all materials found in any of the lines used, this field no longer provides useful data on how in the use of these different materials relates to the gear configuration. This field has little scientific value if there is no way to know what types of branch lines were employed, in different branch line positions.

**Hook type**- The field is the same, but the IATTC version requests that the hook type listed be based upon an IATTC hook guide rather than one that has been developed by SPC. IATTC staff acknowledges that this could present challenges for the observer or even inconsistencies in the data if observers are not aware of the convention area in which the fishing is taking place. It is therefore recommended that if providing the IATTC hook code is not practical, the WCPFC code can be used, and IATTC staff will later convert the WCPFC hook code to the corresponding IATTC hook code.

**Tori lines**- IATTC field description includes the phrase “*and their length*” so that the lengths of the tori lines used will be known and could be considered in future analyses. Resolution C-11-02, Annex 2, prescribes appropriate tori line length for various scenarios, and so it can be assumed that the vessel is aware of their length and could provide them to the observer with minimal effort. Including it might allow future investigation of issues such as seabird hooking rates in relation to tori line length. It is true that the WCPFC standards do not specifically ask for this information, but providing it is not inconsistent with the WCPFC standard and it increases the scientific value of the data.

**Distance between weight and hook, Total number of baskets or floats, Number of hooks per basket, Total number of hooks used, Line shooter speed, Length of float line, Distance between branch lines, Length of branch lines, and Total number of baskets, Floats monitored by the observer**- The amendments proposed by Japan for these fields may be considered as the most significant, since their adoption or not could determine whether the longline observer data submitted by CPCs is truly operational-level data, in addition to their potential impacts on the precision and usefulness of the resulting catch data. The issue raised by Japan with respect to all of these fields is the addition in the IATTC version of the phrase “*For each set,*” (except for the field of Length of Float Line, where the “*for each trip*” was added instead, when maybe using the expression “for each set” would have been more desirable). When the IATTC adopted this modified language, it was not considered as a change in the corresponding WCPFC standards, but rather as a clarification of their intent. The amendments proposed by Japan to delete these phrases from each field begs the question, if this information is not to be recorded at the level of set, then what kind of data is going to be reported in these fields? Will they be averages across all the sets in a trip or some other sort of trip-level summary? If the point of deleting the requirement that this information be reported at the set level is because Japan considers that none of

these parameters change during a trip in all relevant fleets and therefore only need to be recorded once, that should be made clear and understood. Alternately, if the point is that these parameters change infrequently, then perhaps they could be recorded each time that they change. That would be efficient while still allowing for operational-level data to inform future scientific endeavors. The SAC should consider these matters and, consider whether removing this language would still ensure that operational level longline data is being provided. Similarly, if this language is removed, the SAC should seek to clarify the nature of the data that will be reported in these fields.

**Hook number** - The IATTC version of this field differs from the WCPFC version in that the term "*animal*" was substituted for the word "*fish*," meaning that the hook position within the basket would be recorded for all catch, whereas the term "*fish*" excludes sea turtles, sea birds and marine mammals, which are also the subject of this section in later data fields. Hook position, when taken in the context of the other operational parameters of the set, can relate to hook depth and is a potentially valuable parameter. If the forms currently in use allow for the recording of hook number for fish species, why should the situation be different for other, less frequently encountered taxa? One of the acknowledged goals of establishing a longline observer program is to learn more about less frequently encountered, non-target species. Since hook number is already a field that is regularly recorded by observers for fish species, requiring that it be also recorded for non-target species would not alter the overall form. For this reason, while the IATTC standard that was adopted is not identical to the WCPFC standard, it is not inconsistent with it.

**Condition when caught**- The IATTC version of this field directs observers to record the condition when caught for "*sharks*," as well as for individuals of other taxa of interest such as sea turtles, seabirds, marine mammals, whereas the WCPFC version also refers to these general taxa, except for sharks, and instead references only silky sharks and oceanic white-tip sharks. Again, if the observer forms already accommodate for the condition of some sharks to be recorded, then asking the observer to record it for all shark species would not be inconsistent with the WCPFC standard or require revision of the existing observer forms. It is not clear why reporting on the condition of sharks for all of these taxa, could be considered as unduly burdensome or otherwise unacceptable.

**Species of Special Interest**– This comment and corresponding proposal relates to the applicability of an entire suite of fields under this heading. The issue is similar to that in the preceding item on "*condition when caught*" in that the difference is that the IATTC version is inclusive of all sharks, while the WCPFC applies to "*designated shark species*," which relates to a status conferred on some shark species by the WCPFC (i.e. silky sharks, oceanic white tips and whale sharks), and the Japanese proposal does spell out what are these species. However it may be noted that there are other taxa level designations in the list such as sea turtles, seabirds, and marine mammals and the forms are presumably already constructed in a way to allow for this information to be recorded and reported without any changes. The question for the SAC to consider is whether all sharks are species of special interest to the extent that having these fields collected for all shark species would be desirable and whether requiring this information for all sharks would be unduly burdensome. A related consideration, if the proposed amendment is accepted, would be whether additional species that might be designated by IATTC could also be added.