



ISSF POSITION STATEMENT
Presented during the 85rd Meeting of the
Inter-American Tropical Tuna Commission
in Veracruz, Mexico

The **International Seafood Sustainability Foundation (ISSF)** is a global partnership among the tuna industry, science and WWF, the global conservation organization. Our mission is to work toward the science-based conservation and management of tuna stocks and the protection of ocean health by supporting regional fisheries management organizations and advocating for the recommendations of each organization's scientific advisory body.

The first part of our statement addresses three of the most important issues facing global tuna sustainability: reference points and harvest control rules, fleet capacity, and the management of FADs. The second part addresses challenges specific to the IATTC.

GLOBAL ISSUES

Harvest Control Rules (HCRs) and Reference Points. HCRs are a set of well-defined management actions to be taken in response to changes in stock status with respect to target and limit reference points. Unless there is a pre-agreed upon action plan for avoiding overfishing or for rebuilding an overfished stock, long negotiations lead to delayed action or inaction. This delay can lead to further damage to the stock, requiring even more aggressive curtailing of fishing. The adoption of HCRs is a key aspect of modern fisheries management, and is also a requirement of several eco-label certification programs.

ISSF endorses the application of the Precautionary Approach using clear target and limit reference points and HCRs, as called for by the UN Fish Stocks Agreement and by Article IV of the IATTC's Antigua Convention. While most tuna RFMOs have at least begun consideration of limit reference points through their science committees, none have fully implemented these measures. ISSF urges all tuna RFMOs to adopt stock-specific limit and target reference points and HCRs. This is one of the most important actions that RFMO members can take to ensure the long-term sustainability of tuna stocks.

ISSF urges the Commission to establish stock-specific reference points as required by the Antigua Convention. Specifically, IATTC should adopt the interim reference points and harvest control rule recommended by the staff at the 2013 SAC meeting. In 2014, these should be tested for robustness to the main uncertainties in the assessment, such as the stock-recruitment relationship.

Closed Vessel Registries and Management of Fleet Capacity. Experts agree that there is overcapacity in the global tuna fleets. Fishing fleet overcapacity increases pressure to weaken management measures and eventually leads to stock overexploitation. The first step towards managing capacity is to establish limited entry via a comprehensive closed vessel registry with an eye towards ultimately reducing the number of fishing vessels to an appropriate level. Though the IATTC is the only tuna RFMO with a closed vessel registry, its current capacity is well in excess of resource productivity.

ISSF supports the Kobe III call for a freeze in purse seine fishing capacity by developed fishing nations and creating mechanisms to transfer capacity to developing countries with aspirations to participate in these fisheries. These steps should be taken now, since scaling back fleet capacity will become even more difficult as new vessels are introduced. To this end, ISSF urges all tuna RFMOs to:

- Develop capacity transfer mechanisms to allow for increased participation by developing countries without an increase in overall capacity, while ensuring effective monitoring and control of the fisheries;
- Establish rules for monitoring and managing the movement of fishing capacity among the respective Convention Areas;
- Require unique vessel identifiers (such as IMO numbers), in order to strengthen their ability to monitor fishing capacity globally through the Consolidated List of Authorized Vessels (CLAV).

Specifically, ISSF strongly supports amending IATTC Resolution C-11-06 (Resolution on a Regional Vessel Register) to require IMO numbers for large-scale purse seine vessels, and subsequently extending that requirement to large-scale longliners.

Fish Aggregating Device (FAD) Management. Setting on FADs accounts for nearly 40% of global tuna catches and 50% of global skipjack catches. The time is ripe for a concerted global effort to gather and report to RFMOs data on FADs (e.g., via logbooks) in order to better monitor FAD usage and to establish a sound basis for their management in every ocean region. With this information, scientists can advise decision-makers on how to reduce catches of small tunas and bycatch of non-target species that are commonly associated with FADs. Providing science bodies with detailed data on FADs and other floating objects can also greatly improve their stock assessments. However, with the exception of data collected through observer programs, there remains a need and opportunity to improve the information about this type of fishing at the RFMO level. In addition there is a growing understanding of best practices in FAD construction and bycatch mitigation – developments that ISSF is actively promoting – that could be implemented in the short term.

In order to adequately monitor FADs, there are two primary types of information that need to be collected and reported to RFMO scientific bodies: (i) an inventory and activity record of FADs (“FAD logbook”: FAD markings, construction specifications, deployment, retrievals, etc.), and (ii) a record of encounters of fishing and supply vessels with the FADs (“fishing logbook”: catch, by species, that results from sets made on FADs). These two types of information should be linked through the FAD ID or marking. Using this data, RFMO scientific bodies can and should advise on any necessary FAD management measures, followed by the development of effective mechanisms for implementation and compliance monitoring by fishery managers.

*ISSF urges IATTC members to convert the existing “voluntary pilot project” on FAD data collection (in C-12-01) into a mandatory requirement with clear data reporting as noted above. In addition to improving FAD data collection, **ISSF strongly supports the adoption of guidelines for the mandatory use of non-entangling FADs.** This is a critical step in the reduction of shark mortality in the eastern Pacific Ocean.*

IATTC CONSERVATION AND MANAGEMENT MEASURES

1. Tuna Stocks

Bigeye and yellowfin tunas. According to the “base case” assessments presented by the IATTC scientific staff at the 2013 SAC meeting, the yellowfin stock size is 17% below the MSY level and the bigeye stock is slightly above the MSY level; fishing mortality for both stocks is close to F_{MSY} . Although the bigeye analyses indicate that the conservation and management measures - including the purse seine closures - adopted by the Commission since 2009 have had a very positive effect, these results are highly dependent on various assumptions (notably, that recruitment is independent of parental stock size). **If a stock recruitment relationship is assumed, then both stocks are overfished and subject to overfishing. ISSF urges the IATTC to extend the measures contained in C-12-01, for one more year, to January 2015. In addition, the IATTC Commission should direct the staff to develop management advice that is robust to these uncertainties, for presentation at the 2014 annual Commission Meeting to be implemented beginning in 2015.**

Pacific bluefin. The last assessment from the ISC indicates that the stock is highly depleted and that fishing mortality exceeds all reasonable target and limit reference points. Current management measures adopted by WCPFC and IATTC in 2011 and 2012 may be insufficient to rebuild the stock. **ISSF urges the IATTC to adopt stronger conservation measures for bluefin, particularly to reduce the exploitation rate on young age classes.**

2. IATTC Compliance and Performance

The IATTC must improve its transparency regarding the levels of compliance by members with their obligations to the Commission, for example the IATTC does not provide information on the degree to which members follow up on identified infractions, and the Review Committee should annually make clear recommendations to the Commission regarding non-compliance by members and CNMs. **ISSF urges the adoption of amendments to C-11-07 to increase the transparency of the IATTC compliance process** (i.e., make public the responses from members to areas of identified non-compliance) **and increase the level of detail in the Review Committee report** regarding the specific areas where members and CNMs are non-compliant and its recommendations to address such non-compliance.

Furthermore, the Commission lacks a formal regime for responding to types of non-compliance by members and CNMs. **ISSF strongly supports the adoption of a scheme of responses to non-compliance that builds on the CCSBT and/or ICCAT models.** Also, IATTC members have failed to agree on the text for a Resolution to conduct a performance review of the IATTC. An independent performance review is a vital quality-control practice to critically assess the performance of RFMOs in meeting their conventions' objectives. ISSF notes that of the five tuna RFMOs, only the IATTC has not yet had its performance reviewed. **ISSF urges members to agree to a performance review, to be completed prior to IATTC's 2014 annual meeting, following the criteria suggested under the Kobe Process of the tuna RFMOs.**

3. Sharks

ISSF supports the IATTC staff's recommendations for the adoption of conservation measures for **silky sharks**. In addition, IATTC should adopt measures to require the use of non-entangling FADs, which should reduce silky shark mortality.

ISSF urges the Commission to take further steps to enforce **the existing conservation and management measure addressing shark finning, and move to the total prohibition of the at-sea removal of shark fins and mandate that fins remain naturally attached for all sharks landed.** ISSF is also asking all RFMOs, including the IATTC, to **adopt a prohibition on deliberate purse seine setting around whale sharks.** ISSF was pleased to see the WCPFC adopt such a prohibition late last year, and looks forward to similar action by the IATTC.