



ISSF POSITION STATEMENT

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Inter-American Tropical Tuna Commission
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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. ISSF was pleased that in 2013 the IATTC provided clear direction to its Scientific Staff to undertake work to develop HCRs and EPO specific biological reference points, and for the Scientific Advisory Committee (SAC) to make specific recommendations this year. ***ISSF urges the Commission to take action consistent with the 2014 staff recommendations and establish interim EPO species-specific target and limit reference points this year. In addition, the Commission should formally adopt the 2014 staff recommendation for a HCR, which aims to prevent overfishing and rebuild stocks when they become depleted. In 2015, this HCR and interim reference points 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.

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.

Also, in April 2014, IATTC held a Technical Experts Workshop on the Capacity of the Tuna fishing Fleet in the EPO. ISSF strongly supports the Workshop recommendations for strengthening the 2005 Plan for the Regional Management of Fishing Capacity.

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.

Given the importance of a mechanism to transfer capacity from developed to developing countries to any regional capacity management scheme, ISSF hosted a Workshop in March 2014 to start a dialogue among stakeholders on this issue. ISSF hopes this Workshop and dialog will contribute to progressing capacity management in the tuna RFMOs. The workshop report can be accessed here:

<http://iss-foundation.org/resources/downloads/?did=522>

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. Most RFMOs (other than WCPFC) recognized through their actions in 2013 that there remains a need and opportunity to improve the information about this type of fishing and have recently implemented FAD management measures that should compel CPCs to provide needed information.

ISSF notes the substantial progress made by IATTC's adoption of Resolution C-13-04 regarding FAD management and reporting. ***ISSF urges CPCs to provide these data starting 1 January 2015, as called for in the Resolution, and also detailed analysis of FAD usage patterns and catch per effort analysis by their fleets operating in the eastern Pacific Ocean, thus enabling a determination of changes in fishing capacity and likely impacts on stocks managed through the IATTC. ISSF also supports the 2014 staff recommendation for the provision of detailed satellite buoy information for scientific purposes. In addition, the Commission should adopt a marking scheme for identifying individual FADs.***

In addition to improving FAD management, ***ISSF strongly supports the provisions in Resolution C-13-04 that all FAD-directed purse seine fisheries should change to using only non-entangling FADs (FAD designs to reduce the incidence of entanglement of bycatch species, using biodegradable material as much as possible) based on the principles outlined in Resolution.***

ISSF encourages all CPCs to take this step as soon as possible and to undertake research on the effectiveness of various FAD designs, as recommended by the SAC. This is a critical step in the reduction of shark mortality and reduction of other ecosystem impacts 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 2014 SAC meeting, the abundance of the yellowfin and bigeye stocks is slightly below the MSY level, although overfishing is not occurring. Based on these analyses, the staff recommended continuation of Resolution C-13-01 without extending the length of the fishery closure. ***However, ISSF notes that 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. Furthermore, ISSF is concerned that newly-constructed purse seine vessels are being registered to fish in the EPO. ISSF agrees that C-13-01 should be continued as-is for now. However, considering the uncertainties in the assessment and the likely increase in fishing capacity in the near future, ISSF urges the IATTC to monitor the situation very closely and be prepared to implement stronger measures at the 2015 annual meeting.***

Pacific bluefin. The last assessment and projections from the ISC reiterate that the stock is highly depleted, that fishing mortality exceeds all reasonable proxies for Fmsy and that current management measures adopted by WCPFC and IATTC are insufficient to stop overfishing and allow the stock to rebuild. ***ISSF supports the staff's recommended commercial and recreational catch limits for Pacific bluefin in the EPO.***

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 Committee for the Review of the Implementation of Measures adopted by the Commission (Review Committee) should annually make clear recommendations to the Commission regarding non-compliance by members and CNMs. ***ISSF is disappointed that the 2013 Report of the Review Committee was not available until early 2014 and does not include a summary of each Member's compliance information, as we understood was agreed in Veracruz last year. ISSF urges IATTC to ensure the Review Committee report is completed and made available in a timely manner.***

ISSF urges IATTC to increase the transparency of its compliance assessment process through the adoption of amendments to C-11-07 (i.e., make public the responses from members to areas of identified non-compliance) and include in the Review Committee report details regarding each Member and CNM's areas of non-compliance, 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 and Rays

The analyses of fishery indicators for silky sharks presented by the staff at the 2014 SAC meeting suggest that silky shark stocks in the EPO have been reduced considerably. ***ISSF urges the Commission to adopt the staff's precautionary recommendations to conserve silky sharks.***

Regarding mobulid rays, the staff has recommended simple handling practices that can enhance their live release in purse seine fisheries. ***ISSF urges the Commission to adopt these best handling practices as mandatory ones.***

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.**

For further information please visit www.ISS-FOUNDATION.org