Tunas are one of the most dominant and valuable fisheries in the Eastern Pacific Ocean (EPO) supporting a billion dollar industry that sustains the livelihoods of tens of thousands of people and contributes to economic growth and social development in the region. It is therefore vital that the member states of the IATTC maintain and expand their commitment to the responsible management necessary for sustainable fisheries. WWF believes that it is possible to ensure the long-term viability of tuna stocks throughout the Eastern Pacific region while maintaining a healthy ecosystem and safeguarding the rich biodiversity of the region. In this sense, the key issues to resolve and WWF’s recommendations to the IATTC 90th Annual Meeting are:

- Adoption of Harvest Control Rules
- Tuna Conservation
- Management of Fleet Capacity
- Management of FADs
- Species Conservation
- Observer coverage of longline vessels over 20m length and small purse seine vessels
- IATTC transparency
- Safety of observers at sea
Adoption of Harvest Control Rules

Implementation of fishing policies that are guided by reference points and harvest control rules allows managers to act swiftly and efficiently under a pre-agreed standard to ensure that catches do not exceed any acceptable limits, and thereby ensures the sustainability of the resource and the consistent supply of fish to our markets. The adoption of harvest control rules is a key aspect of modern fisheries management and is also a requirement of several ecolabel certification programs.

WWF applauded the steps taken by the IATTC in 2014 to adopt interim target and limit reference points and interim harvest control rules for tropical tunas. At that time the Commission also asked its scientific staff to assess the robustness of these harvest strategies.

Now we urge the Commission to adopt the Staff's recommended harvest control rules for tropical tunas that are based in limit reference points and target reference points. In addition, and due to the existence of uncertainties, we urge the Commission to direct that the harvest control rules and reference points be tested for robustness to the main uncertainties in the assessment, such as the stock-recruitment relationship.

Tuna Conservation

Yellow Fin and Bigeye Tuna: The most updated assessments of the IATTC staff, presented at the 2016 Scientific Advisory Committee (SAC) meeting, showed that fishing mortality of both species is slightly below the level corresponding to the maximum sustainable yield (MSY) in recent years. At that meeting, the staff also reported that as of April 2016, the operative capacity of the purse-seine fleet in the EPO was estimated to be about 11% greater than the previous three-year average and that the measures established in Resolution C-13-01 have fallen short of the intended effect of reducing the fishing mortality, adjusted for capacity, of both species to a level not exceeding the MSY.

Considering this scenario that could lead to an increase in fishing mortality and thus overfishing of stocks in the near future, WWF urges the IATTC to adopt stronger measures to avoid an increase in fishing mortality for all fleets. In this regard, WWF supports measures to increase the length of the fishing closure as recommended by the scientific staff of the IATTC. We also support any effective alternative actions such as a quota management program and extending the time/area closure of "El Corralito" to support the closure. The Commission should seriously consider implementation of pilot projects based on quota management or temporary country active capacity reduction options to mitigate the increased closure length and that could be evaluated over a two year period."

Pacific Blue Fin Tuna: The last assessment confirms that the stock is highly depleted, that fishing mortality exceeds all reasonable reference points. The recovery of the stock may be further delayed if the current scenario of low recruitment continues which is heavily reliant on a major adult cohort in the population. Scientists affirm that for a low-recruitment scenario, more similar to the most recent years of recruitment estimates, reducing catches of juveniles in the EPO to levels lower than those specified in Resolution C-12-09, and greater reductions in juvenile catches in the western Pacific, are required.

WWF urge the IATTC to extend the measures established in the current resolution for two more years and require that the stock be assessed annually so as to monitor it closely. In addition, considering uncertainty of how recruitment is related to spawning biomass, the IATTC should encourage the WCPFC to adopt further measures to reduce the catch of fish over 30 kg in order to protect spawning populations and to reduce the immediate risk of low spawner abundance on recruitment.

Management of Fleet Capacity

The problem of overcapacity in tuna fisheries seems to be common to all tuna RFMOs and this drives excessive fishing effort.

In 2002, the IATTC adopted Resolution C-02-03 on the Capacity of the Tuna Fleet operating in the EPO which set a target level of 158,000 cubic meters of total well volume for the purse seine fishery that must be reviewed on a regular basis. During the last meeting of the SAC, IATTC staff reported that the operative purse-seine capacity on the Regional Register on April 2016 was 255,972 cubic meters. This well volume recorded in the Commission's Regional Vessel Register greatly exceeds the target level prompting the scientific staff to recommend increasing the fishing closure by an additional 25 days.
WWF recommends that the IATTC does not approve additional capacity until such capacity is reduced to the scientifically determined optimum level. Furthermore, WWF urges the IATTC member states to work toward reducing the number of vessels authorized to fish for tuna in the EPO, with removal of associated capacity from the vessel register. A general framework for an EPO wide capacity reduction plan was designed by the IATTC’s permanent working group on fleet capacity on May 14 and we hope that this is finalized at the 2016 annual meeting. WWF recommends that Rights Based Management (RBM) approaches be combined with vessel buybacks and other financial transition programs to help solve the overcapacity problem. Strong RBM programs, with well-defined features, offer a solution to the overcapacity problem and can help the IATTC achieve the objectives of its capacity resolution and regional plan. We further recommend that pilot projects be considered as a means to demonstrate the impacts of capacity reduction programs.

Management of FADs

In its last annual meeting at Guayaquil, the IATTC, in an unfortunate way, decided to revise the resolution adopted in 2013 (C-13-04). This decision delayed the collection and delivery of data on FADs until 2017 and recommending management measures for 2019. By calling for more research and the development of recommendations by 2019, the new FAD resolution also caused serious delay in the implementation of the non-entangling FAD provisions.

In view of the importance for scientists having all the information on the FADS in order to perform a comprehensive analysis to progress the adoption of science-based FAD management measures, WWF calls the Member states, to provide these additional data on movements of FADS to the Commission.

As established by Resolution C-15-03, WWF recommends the IATTC to implement the use of non-entangling FAD designs which have been shown to significantly reduce the entanglement and mortality of sharks and other non-target species in the eastern Pacific Ocean.

WWF is pleased that the IATTC had established a working group on FADs which had its first face to face meeting last May, and commits its technical support to the development of the work of this group.

Species Conservation

Sharks: WWF urges the IATTC to support the staff recommendations to put in place conservation measures to limit the fishing mortality of silky sharks and hammerhead sharks aimed to rebuild the stocks of these species in the region and its recommendation to improve the shark fishery data collection of all fishing fleets operating in the EPO, so that conventional stock assessments and/or other indicators of stock status can be developed to better inform management of shark species in the EPO.

Additionally, WWF urge the IATTC to enforce the existing resolution on shark finning, and strengthen that resolution by requiring that all sharks be landed with fins naturally attached.

Sea Birds: It has been scientifically proven that a combination of weighted branchlines, bird scaring lines, and night setting are best practice mitigation measures for pelagic longline fisheries. Taking this into account, and in accordance of the recommendations of the IATTC staff, WWF recommends that the IATTC adjust Resolution C-11-02 to only allow vessels to choose two of the three mitigation measures stated above. Similar measures have been passed by the International Commission for the Conservation of Atlantic Tunas (ICCAT), the Indian Ocean Tuna Commission (IOTC) and the WCPFC and these are measures that WWF strongly supports.

Sea Turtles: By been lessons learned over several years of implementation of the EPO by-catch reduction program, WWF supports all the recommendations made by the IATTC staff to adequate handling of sea turtles in longline fisheries and urges the parties to adopt such recommendations.
Observer coverage of longline vessels over 20 m length and small purse seine vessels

The information provided by some observer programs of Member states under the framework of Resolution C-11-08 is still scarce but have revealed that 5% is too low a level of coverage to allow accurate estimates of the catch of species caught infrequently in those fisheries, therefore WWF supports the recommendations made by the IATTC scientific staff of 20% observer coverage of large longline vessels until sufficient information is available to justify a revision. WWF also asks strengthen compliance with the existing 5% longline observer coverage requirement by identifying and sanctioning non-compliance through the Review Committee.

Due to the need to strengthen the stock assessments, and know the real impact of this portion of the fleet operating in the EPO, WWF also urges the IATTC to require 100% observer coverage (human or electronic), on purse seine vessels of capacity classes 4 to 5, that currently do not require carry an observer on board.

IATTC transparency

The IATTC must improve its transparency regarding the review of compliance by members with their obligations to the Commission. WWF urges the IATTC to increase the transparency of its compliance assessment process by making public the responses from members to areas of identified non-compliance and include in the Review Committee report details regarding each Member and cooperating non-members areas of non-compliance, and its recommendations to address such non-compliance. We also request that the IATTC set clear milestones for improving compliance by requiring member states to submit a compliance action plan for identified infractions, and begin discussing how the Commission will respond to repeated and significant instances of non-compliance.

Safety of observers at sea

In the course of their official duties, observers are vulnerable to assault, obstruction, resistance, delay, intimidation, or interference, which are all very clear violations under AIDCP Observer Program Resolution A-99-01. Thus, observer providers and authorities have a discrete obligation to address alleged violations reported by observers quickly and effectively. When national observer programmes and other authorities fail to address these reported violations effectively and in a timely manner, it signals to the observer that providers either do not care or are incapable of providing support for their welfare. Moreover, the failure of providers or the national authorities to act on a report has an additional effect of signalling to vessel captains and crew that they may conduct violations against observers without retribution.

Following recent tragedies involving observers both in the WCPFC and IATTC Convention areas, particularly the loss of an IATTC transhipment observer in September 2015, the IATTC must urgently address observer safety and security standards. The IATTC must immediately adopt fisheries observer safety and security standards compatible with those adopted in the WCPFC in December 2015. Currently available technology will allow direct and independent communication between observers and observer providers/authorities. Many of the devices also possess a “panic button” and operate as a waterproof Personal Locator Beacons in cases of an accidental overboard situation. Furthermore, observer programmes must also urgently adopt an Emergency Action Plan (EAP) that clearly designates procedures to ensure that observer emergencies can be quickly and effectively responded to by authorities. The technology tools are effectively useless to the observer if there is nobody designated to respond on the other end. WWF believes that every observer should be issued one of these devices and observer programmes must have a well-defined and effective EAP in place prior to any observer deployment.

Lastly, the IATTC must also implement a recordkeeping and reporting mechanism that requires any violations against observers to be forwarded to the IATTC Secretariat as soon as possible after the incident has occurred subject to sanctions for non-reporting. By informing the Secretariat, the Secretariat may then alert and potentially coordinate with other observer programmes immediately, such as in cases of man overboard situations that require search and recovery coordination. The Secretariat could also offer assistance to the programme and the observer where possible as well as provide follow-up to ensure corrective actions have been taken on behalf of the observer. More importantly, the Secretariat could maintain a record of vessels and persons of interest involved in violations against observers, which could be made available to observer providers to better assess future placement of observers and avoid potential escalation of threats against observers.

WWF recommends the IATTC:

• Mandate authorized observer programmes to provide observers before any boarding for a trip;
  ✓ An approved independent two way communication satellite device; and
A waterproof personal lifesaving beacon

- Mandate authorized observer programmes to develop and implement an “Emergency Action Plan” (EAP) to accommodate any observer emergency including interference or assault; and

- Mandate recordkeeping and reporting requirements that compel all members’ states to report all instances of violations against of observers as soon as possible to the IATTC Secretariat.

Our Smart Fishing Vision and Goals:

Vision: The world’s oceans are healthy, well-managed and full of life, providing valuable resources for the welfare of humanity.

2020 Goals: The responsible management and trade of four key fishery populations results in recovering and resilient marine eco-systems, improved livelihoods for coastal communities and strengthened food security for the Planet.