



ATTN: Heads of IATTC Delegation

10/07/2017

Dear Delegates,

Through this letter, the association of ship-owners and NGO signatories would like to communicate what they consider priority actions and objectives to be discussed at the next IATTC Commission meeting for 2017, which will begin on July 24th.

While we recognize the recent progress of the IATTC in terms of stock management under its jurisdiction, especially in relation to the process that will lead to the adoption of harvest control rules (HCRs), through this letter we would like to contribute to its completion and make sure the process is based on the best available scientific evidence. In addition, in order to secure the excellence that management of shared fisheries resources requires, we think it is critical to improve the management of the Commission along the lines proposed by the 2016 External Performance Evaluation. More specifically, this External Evaluation identified the increase in purse-seine fishing capacity in the Eastern Pacific Ocean (EPO) in the last years as a problem, which we think requires a definitive solution in order to achieve sustainable tuna fisheries.

We would like to highlight that the petitions detailed below seek to ensure tuna sustainability for the Eastern Pacific Ocean. They stem from fishery improvement projects undertaken by both Ecuadorian and Spanish fishing companies in collaboration with the international NGO WWF. In this context, we request IATTC member delegations to evaluate the following points and, should they consider it appropriate, take the necessary actions to include them as a priority for the agenda of the next meeting of the Commission:

- **Improve the quality of IATTC scientific production and recommendation processes through the implementation of a more integrated and transparent approach by the IATTC Secretariat.** The signatories recognize the importance of counting with independent scientific resources and the clear benefits derived from this. However, we also believe that the lack of access to scientific data used by the scientific staff and the lack of clear procedures for the exchange of ideas between the staff and SAC members prevent the effective exercise of dialogue and peer review. Advances in this regard would not only improve the quality of scientific production, but would



also result in a better understanding and support of the scientific recommendations addressed to the Commission (for example, in relation to the supporting evidence to modify the days of closure) and possibly contribute to improving the stability of such recommendations. The following three measures could provide substantial progress in this direction:

- **The approval of a clear protocol for granting access to the SAC and other stakeholders to the scientific data used by the staff, ensuring, like in other RFMOs¹, the applicable confidentiality requirements.**
 - **The obligation that scientific recommendations to the Commission are made based on objectives and parameters clearly defined in a harvest control rule.** The recent recommendation by the scientific staff of an additional 10 days of closure does not respond, for example, to sufficiently explained or agreed criteria.
 - **Adopt a regular peer review system for tropical tuna stock assessments, so that models and parameters used are reviewed externally within a maximum period of 5 years.** Among other, this system should improve the consistency of parameters used by WCPFC and IATTC, including the stock-recruitment relationship used.
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- **The elaboration of a specific Work Plan for the definition of a harvest strategy based on reference points and sufficiently tested harvest control rules.** Document SAC-07-07g recognizes that neither the adequacy of limit reference points (LRP) nor the appropriateness of the current harvest control rule (HCR) have been widely tested with regards to 2014 reference points (except for a preliminary internal assessment made for bigeye by Maunder et al in 2015). In addition, the scientific staff itself pointed out in the same document the need to use a management strategy evaluation (MSE) to determine whether the HCR guarantees a low probability of exceeding LRPs. Finally, Resolution 16-02 requested the Commission's scientific staff to carry out alternative HCR evaluations to enable the Commission to adopt a permanent HCR. Despite this calls for improvement, the only work in this direction presented at the SAC meeting in May 2017 has been a bibliographical

¹ICCAT Guidelines for granting observer status are presented here as an example:
<https://www.iccat.int/Documents/Meetings/Announce/Observer%20Guidelines%20EN.pdf>



review of reference points used in tuna fisheries management (SAC-08-05e (ii)). Similarly, there is no mention to the tasks necessary to achieve these objectives in the Staff Activities and Research Plan (SAC-08-10a) presented at the same meeting (section 2.1.6 of that document refers only to the participation of staff in the MSE technical working group set up in the Kobe process in 2011 and the MSE work for bigeye previously mentioned). With this in mind, recognizing the difficulty that the establishment of HCRs entails not only at the level of scientific analysis but also at the level of resources and stakeholder involvement, and examining how other RFMOs have addressed the same process, the signatories of this letter request:

- **The elaboration of a detailed work plan for the design and evaluation of reference points and alternative widely tested harvest control rules.** This work plan should include not only a time scale of activities, but should also be accompanied by an associated budget. It should also include the evaluation of different management alternatives to meet the agreed management objectives. The plan should also identify training needs of the different parties and propose activities to improve the dialogue between managers and scientists.

- **Formulation of a Regional Capacity Management Plan for the Eastern Pacific Ocean Tuna Fleet.** Based on the capacity resolution of August 19th 2000, and taking into account the elements for the implementation of a fleet capacity management plan submitted by the capacity working group, it is requested to the IATTC Director to finalize and submit as soon as possible a plan for the regional management of capacity in the EPO. This plan should take into account the right of coastal States and other States to develop and maintain their own tuna fishing fisheries and should regularly assess, and modify if necessary, the methodology to estimate fishing capacity and its established capacity limit of 158.000 m³. This plan will also use the Regional Vessel Register established by the resolution of the 66th Meeting of the Commission as the definitive list of purse seine vessels allowed to fish in the EPO, so that purse seine vessels not included in the Register are banned from it (except those intended to replace previously eliminated capacities).

- **Definition of an Action Plan that responds to the findings identified by the External Performance Evaluation,** carried out between October 2015 and June 2016. This



evaluation identified a total of 26 opportunities for improvement in the areas of governance, management and science. Although some of the recommendations made by Moss Adams LLP coincide with the demands set out above (in particular those related to transparency and access to scientific data, to external reviews of stock evaluations and to the development of a Capacity Management Plan), we believe it is necessary that the IATTC Director, in coordination with the SAC, submits an Action Plan responding to each of the findings before the 2018 ordinary meeting.

- **Safety of observers in high seas.** Following recent tragedies involving observers both in the WCPFC and IATTC Convention areas, particularly the loss of an IATTC transshipment observer in September 2015, the IATTC should urgently address observer safety and security standards. The IATTC should immediately adopt fisheries observer safety and security standards at the very least compatible with those adopted in the WCPFC in December 2016.

We will be very grateful if you take in consideration the suggestions developed in this letter and we remain at your disposal for anything you may require.

Sincerely,



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TUNACONS Tuna Fisheries Improvement Project:



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