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POSITION
STATEMENT

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Ocean Practice

WWF POSITION STATEMENT FOR THE 92TH MEETING OF THE INTERAMERICAN TROPICAL TUNA COMMISSION (IATTC)

Mexico, July 24 – 28, 2017

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 92th Annual Meeting are:

- Review of Harvest Strategies
- Tuna Conservation
- Management of Fleet Capacity
- Management of FADS
- Species Conservation
- Observer coverage of longline vessels over 20 m length and small purse seine vessels
- IATTC Transparency
- Mahi mahi research
- Safety of observers at sea

Review of Harvest Strategies

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 2016 to adopt an interim harvest control rules for tropical tunas.

Now 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. To ensure a sustainable management of fish populations it is very important to test the robustness of the management strategy adopted.

WWF remains committed to supporting capacity-building processes of representatives of coastal States on issues related to the formulation of harvest strategies in order to contribute to the work to be done by the IATTC on these issues. In 2015, the tuna project partners of the Common Oceans program organized a first workshop on this important topic (<http://wwf.panda.org/?240030/Eastern-Pacific-Ocean-coastal-states-work-on-how-to-improve-tuna-management>).

Tuna Conservation

Yellow Fin and Bigeye Tuna: The most updated assessments of the IATTC staff, presented at the 2017 Scientific Advisory Committee meeting, showed that in the case of yellowfin tuna, the population is over-fished and therefore needs to be rebuilt. For both species, bigeye tuna and yellowfin tuna, fishing mortality 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 2017, the operative capacity of the purse-seine fleet in the EPO was estimated to be about 6.7 % 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 level that produces MSY.

Fishing capacity will likely continue to increase in the future. 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, measures as increasing the closure to 72 days, as recommended by the scientific staff, as well as other actions such as the allocation of catch quotas with specific monitoring and enforcement provisions, have two closure periods offset by 36 days for the current Southern and Northern closures to allow continuing product flows to canneries and extending the time/area closure of "El Corralito" should be seriously considered as management options by the Commission. In addition, under the auspices of the IATTC, we should consider pilot projects to test "new" innovative ideas for direct mortality reduction in specific geographic regions that utilizes a portion of the fleet. If successful, such pilot programs could be adopted throughout the convention area.

Pacific Bluefin Tuna: The assessment of 2016 confirmed that the fish population is highly depleted, that fishing mortality exceeds all reasonable proxies for Fmsy. The recovery of the population may be further delayed if the current scenario of low recruitment continues which is heavily reliant on a single major adult cohort in the population.

WWF urges the IATTC to maintain the current conservation measure, assess this population closely and to 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.

WWF also recommend the IATTC to coordinate with WCPFC to agree the establishment of Limit Reference Point and Target Reference Point, which are the baselines of setting up a catch limit.

- To adopt a long-term Pacific Bluefin Tuna recovery plan targeting at least 20% of SSBo
- To expand the target size of juvenile Pacific Bluefin Tuna conservation measures from the current under 30kg to under 85kg (in the size of which, it has closely grown to become adult Pacific Bluefin Tuna)
- To introduce a catch limit for adult Pacific Bluefin Tuna
- To establish a consistent formal Catch Documentation Scheme (CDS) for the thorough monitoring of Pacific Bluefin Tuna

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 2017 was 263,283 cubic meters. This current capacity is well in excess of resource productivity.

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, based on the terms of reference agreed at the 2016 meeting, on a management plan that reduces fishing capacity to levels that ensure the sustainability of tuna resources. We hope that this plan is finalized at the 2018 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

It is very important that scientists have more detailed information on the type of FADs, their movements, the catches, so that they can perform a comprehensive analysis to progress the adoption of science-based FAD management measures, WWF calls the Cooperating Parties, in accordance to Resolution C-16-01, to provide these detailed data of FADS to the Commission.

As established by Resolution C-16-01, 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 biodegradable FADs to reduce the impact of lost FADs in the eastern Pacific Ocean.

WWF also supports the recommendations on FADs adopted at the Second Meeting of the IATTC ad hoc working group of FADs (<https://www.iattc.org/Meetings/Meetings2017/SAC08/PDFs/FAD-02-May-2017-Summary-report.pdf>) as well as those by the 8th IATTC Scientific Committee of the IATTC (<https://www.iattc.org/Meetings/Meetings2017/JUL/PDFs/Docs/IATTC-92-04c-SAC-08-Recommendations.pdf>).

WWF hopes that the work being developed in Ecuador, through the implementation of a tuna purse seine Fishery Improvement Project in the EPO, which is being executed in coordination with important industries, can contribute to the development of a FAD management strategy for the region.

Species Conservation

Sharks: WWF urges the IATTC to support the staff recommendations 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 (<https://www.iattc.org/Meetings/Meetings2017/SAC08/PDFs/SAC-08-11-Management-recommendations-2017.pdf>).

In October 2016 silky sharks, three species of thresher sharks and all nine species of mobula rays were included within Appendix II of CITES, which places a greater emphasis on RFMOs to ensure catches are reported accurately to meet CITES reporting obligations.

Additionally, WWF urge the IATTC to adopt measures to mitigate the incidental catch and maximize the release survival of sharks, mobulid rays and 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 and the 7th Meeting of the Working group on Bycatch to adequate handling of sea turtles in longline fisheries and urges the parties to adopt such recommendations (<https://www.iattc.org/Meetings/Meetings2017/SAC08/PDFs/BYC-07-May-2017-Recommendations.pdf>).

Observer coverage of longline vessels over 20 m length and small purse seine vessels

The information provided by some observer programs of Member nations 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 IATCC 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, in line with the scientific staff and the 8th IATTC Scientific Committee recommendations, WWF also urges the IATTC to require 100% observer coverage (human or electronic), on purse seine vessels of capacity classes 3 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 cooperating parties 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.

Mahi mahi research

Since 2012, the scientific staff led a major research project that culminated with the preparation of a stock assessment of mahi mahi in the EPO that was presented in May 2016 at the 7th Scientific Advisory Committee of the IATTC. This information is key to inform the management of this species that is very relevant for the coastal states of the EPO. WWF supports the recommendation made by the 8th IATTC Scientific Committee that the staff continue to do research on mahi mahi, which will allow members to analyse a regional management strategy for this stock.

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 signaling 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 transshipment 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 at the very least compatible with those adopted in the WCPFC in December 2015. Currently available and economical 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, consistent with those measures that have now been in place for over a year in the WCPFC.

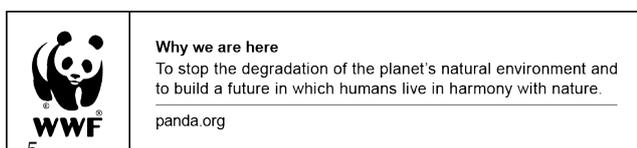
Additionally, the IATTC should also seek to implement a conservation and management measure that explicitly clarifies flag state and coastal state responsibilities specific to the protection of observers. This measure should mirror that approved by the WCPFC in December 2016 and should include specific provisions for proper courses of action in the event of an observer that is missing, injured, or otherwise under threat when deployed. Moreover, both the technology and observer protection measures can and should be approved concurrently at this year's regular meeting.

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 further believes that compliance with all IATTC and AIDCP provisions must be transparent and all such proceedings must be open to public scrutiny.

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 that is centrally monitored 24 hours a day during the period that observers are aboard vessels; and
 - ✓ A waterproof personal lifesaving beacon
- Mandate authorized observer programmes to develop and implement an “Emergency Action Plan” to accommodate any observer emergency including interference or assault; and
- Mandate an observer protection measure consistent with WCPFC CMM 2016-03 that clarifies responsibilities of flag and coastal states including actions in the event of a missing or injured observer.
- 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.
- Make all proceedings involving compliance with IATTC and AIDCP measures open to public scrutiny.



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