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POSITION
STATEMENT

AUGUST
2018



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Ocean Practice

WWF POSITION STATEMENT FOR THE 93rd MEETING OF THE INTERAMERICAN TROPICAL TUNA COMMISSION (IATTC)

San Diego, August 24 – 30, 2018

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 populations throughout the Eastern Pacific Ocean (EPO) 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 93rd Annual Meeting, are:

Tuna Conservation

Management of Fleet Capacity

Review of Harvest Strategies

Management of FADS

Sharks and rays conservation

Population survey of impacted dolphin population

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

IATTC Transparency

Mahi mahi research

Safety of observers at sea

Tuna Conservation

According to the most recent assessments, yellowfin and bigeye tuna populations in the EPO are being overfished. In reports provided to the Commission, scientific staff have acknowledged that access to better data, as well as adjustments in the assumptions of the model, have led to varying results. It is the advice of scientists that the assessment of bigeye must be improved as modelling has become sensitive to the new data. Despite this uncertainty, IATTC scientists recommend maintaining the provisions of the current resolution and establishing additional measures to limit to the number of sets made in association with fish aggregating devices (FADs). The latter recommendation is due to the increase in the use of FADs in the EPO. The number of these floating objects has increased by 24% from 2013-2016. With more FADs on the water, fishing vessels generally make more sets, especially considering that many FADs are equipped with satellite monitoring devices and echo sounders, which increases efficiency and the probability of catching more fish. Indicators point out that this increase in fishing mortality reduces the abundance of populations.

Last year the IATTC adopted a multi-year conservation measure (2018-2020), which includes a 72-day closure to limit the fishing mortality of bigeye and yellowfin tunas. WWF urges the Commission to adopt stronger measures to avoid an increase in fishing mortality from all fleets. We recommend the establishment of more strict limits on the use of FADs and/or a uniform limit on small bigeye and yellowfin tunas for all vessels in combination with improved monitoring and enforcement provisions (a uniform limit approach will constrain the least number of purse seine vessels). In addition, the IATTC should consider pilot projects to test innovative ideas for direct mortality reduction in specific geographic regions with a portion of the region's fleet. If successful, such pilot programs could be adopted throughout the convention area.

Pacific Bluefin Tuna:

The updated stock assessment confirmed that the fishing mortality on small fish (<30kg) of the Pacific bluefin tuna has been reduced and that reaching the first rebuilding target is likely ($\geq 98\%$) if current fishing and environmental conditions continue. However, it was also confirmed that the fish stock was still overfished and was subject to overfishing.

Therefore, WWF recommends IATTC to adopt the second rebuilding target for the PBF stock size is $20\%SSBF=02$, to be reached by 2034, or 10 years after reaching the initial rebuilding target, whichever is earlier, with at least 80% probability. WWF also recommends IATTC to take precautionary approach and not to modify current resolution (C-16-08) to increase current catch limits until next full assessment of the Pacific Bluefin tuna.

Management of Fleet Capacity

The substantial growth of fishing capacity of tuna purse seine vessels operating in the EPO in the last two decades has led to a current fleet capacity that is almost double the IATTC's target level. This excess capacity not only affects the ecological health of tropical tuna stocks but also has a negative impact on the profitability of the industry estimated at \$47 million annually.

The problem will become even more serious as authorized vessels can increase fishing pressure requiring continuous lengthening of the closed season. Future replacement of existing vessels with more efficient ones will intensify this "race to fish". Clearly, there is an urgent need to fix this problem to ensure the health of tropical tuna stocks in the Eastern Pacific and the future of the industry dependent on these fisheries.

WWF calls on the IATTC member states to adopt measures to reduce fleet capacity in the EPO with urgency and under no circumstances approve additional capacity. This means finalizing a management plan for fishing capacity that adopts measures such as the proposals recommended in a study released by WWF under the Common Oceans ABNJ Project on Ocean Partnerships and presented during the 19th Meeting of the Permanent Working Group on Fleet Capacity. We recommend adoption of the following actions:

- A suite of "small steps" that set the stage for capacity reduction could be adopted at the August annual meeting of the IATTC as the first phase of the capacity management plan.
- Design features for IATTC action such as allocation and improved catch monitoring to facilitate member state adoption of individual transferable quota (ITQ) approaches by member states. The Study shows that these programs result in a reduced fleet size that is close to the optimum and the remaining fleet is more profitable.

The Commission has reviewed a number of allocation proposals submitted by members and can establish a process to finalize allocations and improved catch monitoring over the next year.

-Incentives such as a proportional reduction in the length of the closed season for member countries taking steps to reduce fleet capacity through permanent buybacks/retirement of capacity or pilot/demonstration programs such as voluntary quota programs. Such programs would be modified and expanded using a stepwise approach to full adoption.

The IATTC should also consider a modification of the proposal submitted by Japan (Prop-H-2-JPN) that will slowly decrease both technological and actual vessel hold capacity. This modified proposal would require the “retirement” of 40% of the equivalent capacity of replacement vessels on the vessel register and fleet capacity in the EPO would reach the optimum in 23 years.

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 interim harvest control rules for tropical tunas.

Now we urge the Commission to conduct a Management Strategy Evaluation for tropical tunas in the EPO. This will allow for testing of the current harvest controls with respect to the adopted limit and target reference points, as well as alternatives accounting for various uncertainties. Robust evaluation is key to informing Commission Members about the effectiveness of existing reference points and harvest control rules, compared to alternatives, and to help guide the adoption of a permanent rule.

The creation of a working group dedicated to promoting dialogue between the main stakeholders would facilitate the development and adoption of comprehensive harvest strategies. In that sense, WWF urges the Commission to create this working group as recommended by the Scientific Advisory Committee (SAC) during its last meeting in May 2018.

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. This year, in coordination with the IATTC, ISSF, FAO, and all partners of the Common Oceans project, WWF will support a workshop on evaluation of management strategies (https://www.iattc.org/Meetings/Meetings2018/WRK-MSE-01/_English/WRK-MSE-01-EN_Meeting%20Notice.pdf).

Management of FADS

WWF recognizes the efforts of the IATTC to better manage FADs through the establishment of maximum numbers by vessel type, the adoption of prototypes of non-entangling FADs by the fleet and the requirement of data reporting. However, there is an urgent need to adopt a comprehensive management strategy for these devices. A strategy that contemplates substantial improvements in the collection and reporting of data, technological innovation and clarification of terminology related to fishing with FADs.

It is very important that scientists have more detailed information on the type of FADs, their movements, and subsequent vessel catches, to progress the adoption of science-based FAD management measures. WWF calls on Cooperating Parties, in accordance to Resolution C-16-01, to provide this detailed data to the Commission.

WWF also urges the IATTC to continue to work in a coordinated manner with interested parties in regional research on prototypes of biodegradable FADs.

WWF recognizes the advances being made in Ecuador on the development of a FAD management strategy for the country through the TUNACONS Fishery Improvement Project, a collaborative process led by industry in direct coordination with the government.

Sharks and rays conservation

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. The Commission should place special emphasis on

improving data collection on the capture on hammerhead sharks and silky sharks in coastal longline and gillnet fisheries, high-seas longline fisheries, and small-scale purse seine fisheries.

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 regional fisheries management organizations to ensure catches are reported accurately to meet CITES reporting obligations.

Additionally, WWF urges 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.

Population survey of impacted dolphin population

Knowing the status of dolphins impacted by purse seine operations is essential for the establishment of conservation measures within IATTC. Last survey was done in 2006 by the National Oceanic and Atmospheric Administration, and urges to be updated. WWF stresses that this survey has to be conducted immediately.

WWF also requests to secure the comparability between the results of the new survey and previous surveys. We understand that important changes are proposed such as the use of purse seine tuna vessels, drones and intensification of the survey in certain areas. For this WWF requires: (1) participation of the scientists that made the previous surveys in the discussions, (2) enough data using the previous methodology for making sound direct comparisons, (3) transparent and complete database of the observations with the previous methodology, available to third parties, (4) clear, robust and transparent calibrations for the proposed modifications in research platform, use of drones or any other changes in the methodology.

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 reveals 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, 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 and management strategy evaluation (MSE) 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. At the 92nd annual meeting, the IATTC allocated resources for staff to expand the MSE for mahi mahi by evaluating alternative reference points and harvest control rules for mahi mahi in the EPO. WWF asks the Commission to begin this work by September 2018 and to share the results with IATTC member states on or before the 10th meeting of the Scientific Advisory Committee in May 2019. This information has already been requested by some member states and it is key to developing a sound 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.

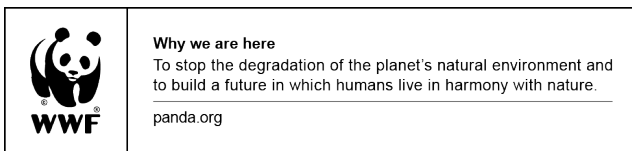
Additionally, the IATTC should also seek to implement a conservation and management measure that explicitly clarifies flag state and coastal state responsibilities specific to the protection of observers. This measure should mirror that approved by the WCPFC in December 2016 and should include specific 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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