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October 3, 2014

Dear IATTC Delegate:

We are writing on behalf of The Pew Charitable Trusts in regards to the discussions that will take place at the upcoming Inter-American Tropical Tuna Commission (IATTC) 87<sup>th</sup> Meeting (Resumed), on 27-29 October 2014 in La Jolla, California, USA.

The Pew Charitable Trusts thanks IATTC for the opportunity to participate in the continuation of the 87<sup>th</sup> meeting as an observer. We are hopeful that at this meeting, parties will seize the opportunity to adopt science-based conservation measures, in line with Scenario 6 of the International Scientific Committee for Tuna and Tuna-like Species in the North Pacific Ocean (ISC) stock assessment, for the severely depleted Pacific bluefin tuna species. We look forward to again engaging in this process and refer to our comments included both in our policy brief, *Recommendations to the 87th Meeting of the Inter-American Tropical Tuna Commission*,<sup>1</sup> and our letter to parties dated 8 July 2014 regarding the original bluefin proposals submitted by Japan and the United States to the Lima meeting, namely IATTC-87 I-1 and IATTC-87 I-2.

As management of Pacific bluefin tuna is shared between IATTC and the Western and Central Pacific Fisheries Commission (WCPFC), it is critical that conservation measures are consistent and harmonized between these two bodies. The Northern Committee of WCPFC met in early September and advanced a recommendation to the December 2014 annual meeting of WCPFC entitled, "Conservation and Management Measure to Establish a Multi-Annual Rebuilding Plan for Pacific Bluefin Tuna" (Draft CMM). The measure is expected to be adopted by the WCPFC as drafted. Importantly, it follows the scientific advice of Scenario 6 put forward by the ISC. For the western Pacific, this translates into a 50% cut in juvenile catch from 2002-04 levels and a cap on adult catch at 2002-04 levels.<sup>2</sup> **The spotlight is now on the IATTC to act similarly in accordance with Scenario 6 by adopting a total catch limit of 2,750 mt for the eastern Pacific.**

We read with interest the new proposals of Mexico (IATTC-87 I-3) and Japan (IATTC-87 I-1A) for Pacific bluefin tuna conservation and management. There are some strong elements in both proposals, such as weekly reporting to the Secretariat, continued development of a catch documentation scheme (CDS), and stricter limits on both commercial and recreational mortality. However, Mexico's proposal of a 4,327 mt commercial catch limit, with 308 mt separately allocated for recreational catch, equates to total catch of 4,635 mt, nearly 70% higher than the level set forth in ISC Scenario 6. Similarly, the Japanese proposal, which contains a total commercial catch limit of 3,182 mt and a separate 142 mt recreational catch limit, equates to a total of 3,324 mt, and exceeds ISC's Scenario 6 by 20%. The scientific advice for a 2,750-mt eastern Pacific total catch limit is clear. Any proposal adopted should reflect this clear advice and associated limit. At this time, neither Japan's nor Mexico's proposals are sufficient to ensure an effective first step toward recovery of this decimated population.

<sup>1</sup> Available online at <http://iattc.org/Meetings/Meetings2014/July/PDFs/PEW-Recommendations-to-the-87th-meetingENG.pdf>

<sup>2</sup> For management purposes, the Northern Committee defines juveniles as fish less than 30 kg and adults as fish greater than 30 kg.

Finally, another element of the Northern Committee Draft CMM is the establishment of a 10-year rebuilding plan for the stock, which requires that management measures have at least a 60% chance of successful rebuilding to the target by 2024. However, the target is currently set at “historical median biomass,” which because the stock has been severely overfished for much of the assessment period, equates to less than 7% of the unfished level. **Pew strongly urges IATTC to adopt a more legitimate rebuilding target of 25% of unfished population size for negotiation with the WCPFC.** A minimum target of 25% is appropriate because: a) 40% of unfished biomass has been recommended as a proxy for maximum sustainable yield, with a range of 30-60% of unfished biomass depending on the resilience of the species,<sup>3</sup> b) WCPFC has adopted a limit reference point of 20% of unfished adult size for tropical tunas, and c) southern bluefin tuna have an interim rebuilding target of 20% of unfished adult size.

**For all of these reasons, IATTC should adopt a measure that includes, at a minimum:**

- **A yearly catch limit of not more than 2,750 metric tons, inclusive of the catches of minor harvesters, recreational fisheries, and dead discards;**
- **A comprehensive, basin-wide rebuilding plan for Pacific bluefin tuna that will return the population to 25 percent of the unfished size within 10 years, ensuring that management measures are effective and complementary and applied consistently on both sides of the Pacific in cooperation with WCPFC, as required in Article XXIV of the Antigua Convention.**

Further, to ensure these measures are effective, there must be strong monitoring and enforcement, including a catch documentation system, 100% observer coverage at transfer to ranches and at harvest, and authorized vessel lists.

We look forward to working with you in La Jolla to ensure that science-based measures are adopted to rebuild the severely depleted population of Pacific bluefin tuna. If the IATTC and WCPFC do not act this year to reduce commercial and recreational fishing mortality of Pacific bluefin tuna in line with the scientific advice, there may be no other choice but to seek other management options such as a basin-wide suspension of fishing for this species, and/or trade restrictions.

Sincerely,



Amanda Nickson  
Director, Global Tuna Conservation



Elizabeth Wilson  
Director, International Ocean Policy

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<sup>3</sup> Restrepo VR, GG Thompson, PM Mace, WL Gabriel, LL Low, AD MacCall, RD Methot, JE Powers, BL Taylor, PR Wade, and JF Witzig. 1998. Technical Guidance on the Use of Precautionary Approaches to Implementing National Standard 1 of the Magnuson-Stevens Fishery Conservation and Management Act. NOAA Technical Memorandum NMFS-F/SPO-31. 54 p.