

**Oceans Practice** 

# WWF POSITION STATEMENT FOR THE 101<sup>ST</sup> MEETING OF THE INTER-AMERICAN TROPICAL TUNA COMMISSION

**August 7 – August 11, 2022** 

The World Wildlife Fund for Nature (WWF) thanks the Inter-American Tropical Tuna Commission (IATTC) for the opportunity to attend the 101st regular session as an observer.

WWF encourages IATTC member countries to make rapid progress on measures to recover marine species in the region and maintain and expand their commitment to responsible management. These are necessary conditions for achieving sustainable fishing. This is vital, since tuna in the Eastern Pacific Ocean supports a fishing industry that sustains the livelihoods of tens of thousands of people and contributes to economic growth and social development in the region. WWF's recommendations for the 101st Annual Meeting of the IATTC are summarized as follows:

- i. **Tropical Tunas:** a) Continue the Enhanced Monitoring Program for bigeye tuna catches and secure financing for its continuity in 2024. b) Adopt limit and target reference points for skipjack tuna, taking into account the methodology proposed by the Commission staff (SAC-14-09).
- ii. **Management strategies evaluation (MSE):** a) Continue to effectively support the staff's MSE work plan, ensuring financial resources to successfully complete all scheduled activities until 2024, and beyond, and b) Create an MSE working group that allows institutionalizing this process within the IATTC.
- iii. **Pacific Bluefin Tuna:** Follow the scientific advice and not increase catches.
- iv. **North Pacific Albacore tuna:** Establish a harvest control rule based on the results of the MSE adopted in 2022.
- v. **Fish Aggregating devices:** Improve accountability and reduce the ecosystem impacts of FADs through a number of measures detailed below.
- vi. **Observer Coverage:** Phase in 100% observer (person or electronic) coverage on all purse seine vessels and longline vessels greater than 20m, starting with a requirement for at least 30% observer coverage in 2024 for all longline vessels and purse seine vessels less than 363m gross tons.
- vii. **Electronic Monitoring:** Accelerate the development of an Electronic Monitoring Program for the fleets.
- viii. **Shark Conservation:** Adopt mitigation measures to bycatch and maximize shark release, as well as strengthen the finning resolution by requiring all sharks to be landed with the fins naturally attached to the body.
- ix. **Mahi mahi conservation:** Evaluate their status and manage the population of mahi mahi in the Eastern Pacific.

# 1. Conservation of Tropical Tunas

In October 2021, through Resolution C-21-04, the IATTC established a 2022-2024 multi-year program of conservation measures for tropical tunas in the eastern Pacific Ocean. The conservation program, with additional management measures, seeks to prevent fishing mortality (F) from exceeding the average fishing mortality during the most recent three-year period (2017-2019)1. The conservation program includes a 72-day closure for the purse-seine fishery and catch limits on the longline fishery, but also introduced new measures such as individual vessel limits on the catch of bigeye tuna, which are associated with extended closures for vessels exceeding the limits, a reduction in active FAD limits by vessel capacity class, and new provisions on FAD data.

Following the provisions of the resolution, the IATTC staff analyzed the effects of its first year of implementation on the stocks. For bigeye and yellowfin, recent stock status indicators were compared with the 2020 risk analysis results, and for skipjack, the 2022 interim stock assessment was used.

Scientific staff are particularly concerned about the resumption of the general trend of increasing numbers of floating object sets observed since 2005 (SAC-14-04). Although this increasing trend had been interrupted with the onset of the COVID-19 pandemic in 2020, this increasing trend has resumed in 2021 and 2022, when the effects of the pandemic on fishing operations gradually abated. In 2022, the number of sets on floating objects reached its highest historical value since 2000 (17,699 sets, SAC-14-04), a number that exceeded the status quo level (~16,000 sets) by 11%.

For bigeye, the preliminary estimate of their catches in floating object sets in 2022 is 46,487 tons, 30% below the status quo level of 65,937 tons. Scientists cannot determine whether this decline is

<sup>&</sup>lt;sup>1</sup> Also called status quo conditions.

due to the expected reduction in bigeye catches from the establishment of annual bigeye catch thresholds for purse seine vessels, adopted by the Commission for 2022-2024, or due to another factor such as weak recruitment of bigeye tuna that have recently entered the fishery. The 2024 bigeye stock assessment will help better assess the cause of these recent trends.

For yellowfin tuna, the risks of exceeding the target reference points and limits established in Resolution C-16-02 are low. Although the scientists express concern and offer to further investigate the causes in the stock assessment to be submitted in 2024, given that the preliminary estimate of yellowfin catch in floating object sets in 2022 is 90,128 tons, 45% above the status quo level.

The preliminary estimate of the skipjack catches in floating object sets in 2022 is 241,420 tons, 9% above the status quo level. The skipjack population status indicators for other types of sets (on dolphins and unassociated) do not show significant changes during 2020-2022 with respect to the status quo. The stock assessment estimates that, although the current fishing mortality is above the status quo, it is below the level corresponding to the target reference point, and the target and biomass limit reference points were not exceeded.

## With this background, WWF requests the following from the IATTC members:

- i) Continue the Enhanced Monitoring Program for bigeye catches and ensure financing for its continuity in 2024.
- ii) Continue to improve assessments and risk analysis for tropical tunas.
- iii) Adopt limit and target reference points for skipjack tuna, considering the methodology proposed by the Commission staff (SAC-14-09).
- iv) Continue working to improve the stock assessment of skipjack tuna, especially using recently collected tagging data.

# 1.1 Management strategy evaluation

The current work carried out by the IATTC staff to develop the Management Strategy Evaluation for tropical tunas in the Eastern Pacific is essential. This body of work informs the members of the Commission on the effectiveness of the reference points and the existing harvest control rules, compared to alternatives, and will help guide the adoption of a permanent rule.

WWF notes with concern that the ongoing Management Strategy evaluation work plan, with an initial focus on bigeye and moving to other tropical tunas towards the end of the current plan, in 2024, is currently only funded until the end of the year 2023. Many fisheries already certified or in the process of assessment depend on it. WWF asks the Commission to:

- i) Continue to effectively support said work plan, ensuring financial resources to successfully complete all the activities scheduled until 2024, and beyond, and
- ii) Create a management strategy evaluation working group that allows institutionalizing this process within the IATTC.

## 2. Pacific Bluefin Tuna Conservation

Technical reports of all scientific and management bodies responsible for management of the Pacific Bluefin tuna stock, including the International Scientific Committee for Tuna and Tunalike Species in the North Pacific Ocean (ISC) and the IATTC, indicate that the Pacific Bluefin tuna stock are recovering, however it remains in poor condition. The updated stock assessment by the ISC in 2022 confirmed that:

- ✓ Stock has recovered to 65,464 tons but it is still only 10.2% SSBo.
- ✓ According to future projections, the initial rebuilding target will be achieved in 2019, ahead of schedule, and the second rebuilding target will also be recovered earlier than the target year of 2029.
- ✓ In the last five years, small Pacific Bluefin tuna's (ageo to 2) stock has significantly increased as a result of reduced fishing mortality by CMM.
- ✓ Stock is overfished relative to the biomass-based limit reference points adopted for other species in WCPFC (20%SSBo).

Although Pacific Bluefin tuna stock is on recovery trend, WWF maintains deep concerns regarding the health of the Pacific Bluefin tuna stock and remains committed to restoring and rebuilding this ecologically, sociologically, and economically important fishery resource. Therefore, WWF recommends the IATTC to take a precautionary approach for rebuilding this stock.

#### **WWF recommends that the IATTC:**

- ✓ Follow the staff's scientific advice, that is, to maintain the provisions of the resolution C-21-05, and not increase catches.
- ✓ Establishing Management Strategy Evaluation (MSE) with a precautionary Limit and Target Reference Point for Pacific Bluefin tuna by 2025.
- ✓ Reaching recovery targets as soon as possible without immediately increasing fishing quotas; and
- ✓ Developing Catch Documentation Scheme (CDS) for the thorough monitoring of Pacific Bluefin tuna to ensure proper stock assessment and reduce IUU fishery risk by 2024.

## 3. North Pacific Albacore Tuna Conservation

The Albacore Working Group of the International Scientific Committee for Tuna and Tuna-like Species in the North Pacific Ocean (ISC) completed the latest stock baseline assessment in 2020. The next one is scheduled for 2023. The Working Group concluded that the North Pacific albacore tuna population is healthy, and that productivity was sufficient to support recent levels of exploitation, assuming both short- and long-term average historical recruitment. In 2021, the Working Group completed the assessment of Management Strategies for the North Pacific albacore stock, in which management and conservation objectives were agreed upon.

WWF supports the adoption of a robust harvest strategy, using the results of the completed Management Strategy Evaluation process, and taking into account the list of candidate reference points and candidate harvest control rules that have already been tested by experts of ISC throughout the MSE process, as those choices were not simply suggestions by scientists, but were based on dialogue between scientists, managers, and stakeholders over the past several years.

## 4. Management of FADS

WWF acknowledges the efforts of the IATTC CPCs to improve the management of the FAD fishery. In addition to these efforts, there is however an urgent need to adopt a comprehensive management strategy for FADs that incorporates monitoring, management and control components. In this context, WWF urges IATTC members to do the following:

- Provide the FAD data of each fishing trip without an observer on board to the IATTC staff as soon as possible after the end of the trip.
- Provide IATTC staff with historical raw buoy data received by original users (i.e., vessels, fishing companies), including both trajectories and acoustic biomass information.
- Incorporate a clear mandate about a gradual process for the transition of fleets towards the exclusive use of biodegradable FADs within the next 3 years.
- Reduce, within the gradual process of implementation of biodegradable FADs, the amount of material and non-biodegradable components used in their construction.
- To reduce the risk of marine megafauna becoming entangled in the nets of traditional FADs, when they drift into the sea or when they end up stranded, use materials without mesh for the construction of the FADs and thus eliminate possible entanglements.
- Develop and implement science-based set limits on FADs that are consistent with management objectives for tropical tunas and establish science-based limits to reduce the total number of FADs deployed per vessel.
- Develop and adopt a fully transparent FAD recovery policy.
- Develop and adopt a FAD marking scheme, which requires marking the buoy and the FAD structure.
- Adopt clearer rules on FAD ownership and stricter rules for activation and deactivation of FAD buoys.

# 5. Observer Coverage for Longline Vessels over 20m in Length and Small Purse Seine Vessels

The 5% coverage of observers in the longline fleet is too low for an accurate estimate of catches of rare species. Additionally, the non-coverage of observers in purse seine vessels smaller than Class 6 does not allow the improvement of the assessments of tropical tuna stocks, which consequently weakens the capacity of the scientific staff to present better scientific advice to the members of the Commission.

WWF asks the IATTC to phase in 100% observer coverage over the next three years that requires at least 30% observer coverage (human and electronic) by 2024 on purse-seine vessels of less than 363 tons carrying capacity that normally do not have observer coverage on board and for all longline vessels of more than 20 m in length. As recommended by the scientific staff, the increase in data collection and reporting will strengthen stock assessments and improve knowledge of the impact of these fishing vessels on IATTC stocks.

## 6. Electronic Monitoring

WW supports the Work Plan for the electronic monitoring system, and the set of recommendations contained in document SAC-14 INF-H, prepared by the scientific staff of the Commission.

WWF asks the IATTC to accelerate the development of an Electronic Monitoring Program through the new Electronic Monitoring Working Group and to meet the milestones in the IATTC electronic monitoring system work plan.

## 7. Shark Conservation

WWF is concerned by the plight of sharks globally and in the region and asks the IATTC to quickly implement the recommendations of its scientific staff, so that all fleets operating in the Eastern Pacific improve the collection of shark fishery data. This is particularly necessary so that conventional stock assessments and/or other indicators of stock condition can be developed to better inform the management of the various shark species. The Commission should place particular emphasis on improving catch data collection for CITES-listed species, such as hammerheads and silky sharks, as well as other species that are caught by coastal longline, coastal gillnets, deep-sea longline fisheries and small-scale purse-seine fisheries. It would be highly beneficial for the IATTC to establish a long-term monitoring program for shark fisheries in Central America.

WWF further encourages the IATTC to adopt bycatch mitigation measures and maximize the release of sharks. WWF reminds the IATTC to ensure compliance with the existing shark finning resolution, and also **calls on the IATTC to strengthen the finning resolution and to enforce it by requiring all sharks to be landed with their fins naturally attached to the body.** In the case of silky sharks, we request that the compliance committee review the level of compliance with Resolution C-21-06.

Finally, WWF recommends that the IATTC prepare non-detriment findings reports (NDF's) for the areas within its jurisdiction for oceanic sharks and rays listed in Appendix II of CITES, when the intention of the contracting parties is to fish and commercialize their products legally and sustainably and agree to protocols to authorize national CITES exports based on these NDF's.

## 8. Seabird Conservation

WWF recommends reviewing Resolution C-11-02 so that it is consistent with current knowledge regarding seabird mitigation techniques described in document SAC-08-INF-D. The two-column menu system in C-11-02 should be replaced with the requirement to use the three mitigation methods (weighted lines, night sets, and bird-scaring lines) in combination in such a way that they satisfy the requirements recommended by ACAP and BirdLife International.

## 9. Sea Turtle Conservation

On January 1, 2021, a revised resolution on sea turtles (C-19-04) entered into force, requiring the Eastern Pacific tuna fisheries to implement several measures aimed at reducing the bycatch of sea turtles.

Recently, a collaborative research project (BYC-11-01) between the IATTC and the Inter-American Convention for the Protection and Conservation of Sea Turtles, used the EASIFish approach as an alternative means to assess the state of vulnerability and simulate conservation measures and management that can mitigate the risks posed by fishing to the critically endangered eastern Pacific leatherback population. **WWF supports the conservation measures proposed in the study, which include the use of circle hooks, fish bait, and best handling and release practices, to reduce leatherback mortality,** and calls on member countries of the Commission that operate longline fleets, to adopt them as soon as possible.

## 10. Collaborative Research on Mahi Mahi

In most of the coastal nations of the eastern Pacific Ocean, from Guatemala in the north to Peru in the south, mahi mahi (*Coryphaena hippurus*), is one of the main resources exploited by artisanal fisheries.

The Antigua Convention establishes that one of the functions of the IATTC is "to adopt appropriate measures to avoid, limit and reduce the effects on associated or dependent species". Mahi mahi is a species that is caught incidentally in the tuna purse-seine and industrial longline fishery in the Eastern Pacific, which prompted some Eastern Pacific coastal States, members of the IATTC, to request the Commission to carry out collaborative research on mahi mahi led by IATTC scientific staff. These investigations, which are very robust from a scientific point of view, began in 2013, and concluded with an assessment of the mahi mahi population and an assessment of management strategies that were completed in 2016.

Recently, several IATTC coastal states, interested in knowing the current status of the population of mahi mahi in the Eastern Pacific, have proposed that the IATTC staff once again provide scientific and technical assistance to member countries in order to update the work that was carried out in 2016.

WWF urges the Commission to support the SAC's recommendation to consider assessing and managing the Eastern Pacific mahi mahi population.



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To stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature.

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