

Bilbao, July 22, 2019

Dear delegates:

The representatives of the industry that participate in fishery improvement projects (FIP) for tuna purse seine in the Pacific Ocean (US PACIFIC TUNA GROUP and TUNACONS), are sharing our comments on objectives and priority actions for the next meeting of the Commission, which will begin on 22 July 2019.

It is worth noting that these suggestions are aimed at helping the sustainability and conservation of tuna resources in the Pacific Ocean. This input comes from FIPs implemented by Ecuadorian and American fishing companies in collaboration with WWF. The signatories of this letter ask that the members of the IATTC evaluate the following points and, if deemed appropriate, start the necessary actions so that they become a priority included in the agenda of the next meeting of the Commission:

1. Conservation of tropical tunas: bigeye tuna, skipjack, and yellowfin

Harvest control rules: It is very important that scientific recommendations to the Commission be based on the objectives and parameters defined in a harvest control rule. We support the full implementation of the work plan for the evaluation of management strategies currently under way in the Commission. It is very important that IATTC consolidate this process.

Strengthen IATTC stock assessments processes: The scientific staff of the IATTC must clarify and reduce the uncertainties in the assessments of bigeye tuna and yellowfin tuna. It is necessary to have robust stock assessments for all tropical tuna species, and for that reason we recommend the following:

- ✓ Continue to review the longline data from Asian flagged vessels to ensure that the inputs for the stock assessments are not subject to bias (without taking into account the high qualification of abundance and estimated selectivity indicators for this fishery);
- ✓ Maintain the regional tuna tagging program and promote the launch and implementation of any other small-scale tagging projects so the data can be incorporated into future evaluations carried out by the IATTC;
- ✓ Promote research on alternative abundance indices from IATTC fisheries, in particular, dependent and independent indices derived from the use of FADs and echosounder data;
- ✓ Contribute to alternative stock assessment models and methodologies with CPCs or independent scientists by sharing the data and information necessary to conduct these assessments. The results should be presented in the Scientific Advisory Committee (SAC);
- ✓ Institutionalize an external peer review system for stock assessments of tropical tuna to ensure that the models and parameters used are reviewed consistently. This review system should improve the reliability of the parameters used by both the WCPFC and the IATTC, including the relationship between productivity and recruitment.

2. Regional management plan for fishing capacity in the Eastern Pacific Ocean

Over the past two decades, the growth in fishing capacity of the tuna fleet operating in the EPO has caused the current fleet capacity to be higher than the recommended

optimum level for the region. This overcapacity affects the health of tropical tuna populations, and it can also negatively impact the profitability of industry in both the medium and long-term.

It must be a priority that IATTC establishes a Regional Capacity Management Plan for the tuna fleet of the Eastern Pacific Ocean. The resolution on fleet capacity in August 2000, and recent studies both demonstrate possible scenarios for the reduction of fishing capacity. We again ask the IATTC Director to finalize and present this plan before the end of this year. The work done by hired consultants with the financial support of a CPC still leaves needs of this Commission unaddressed. There needs to be a practical tool with the technical and political capability to help reduce fishing capacity, which is certainly a significant threat to the tuna stocks of this region.

3. Observer coverage

IATTC must achieve human or electronic observer coverage at levels greater than 20% for fishing fleet operations that do not meet this coverage level, such as longline vessels over 20 meters in length and purse seiners under class 6.

One way the Commission can support this increased coverage is by adopting standards for electronic monitoring systems and their use. This helps provide solutions for vessels that have difficulty in placing onboard human observers due to lack of space.

4. Management of Fish Aggregating Devices (FADs)

A comprehensive FAD management strategy must be developed through the FAD working group that minimizes ecological impacts and better manages the fishing activities using this fishing method.

Biodegradable FAD material pilot tests conducted through private initiatives¹ are currently underway in the region and should have the support of the Commission and their scientific staff. Other initiatives that can be supported include good handling practices of bycatch, reducing the impact of fishing activity on juveniles (e.g., sorting grids), and the monitoring and recovery of FADs to avoid stranding events and minimize their impact on the marine ecosystem with bycatch and ghost fishing.

5. Scientific Advisory Committee

The role of the SAC should be formalized so that it becomes the only entity responsible for the review and adoption of recommendations and scientific advice to the Commission.

The functions of the SAC and the IATTC staff can be simplified. The scientific staff of the IATTC should be integrated into the SAC and the scientific advice should move in the direction of reducing effort level to ensure the maximum sustainable level of the tuna stocks. Any recommendation on measures to be implemented should include an objective and explore the different ways to achieve that objective - not only be limited to a recommendation chosen by the scientific staff of the Commission.

Whether the staff conservation recommendation for this year is justified or not, we noticed that an objective was not provided and the proposal justification can be more robust. The SAC should be shown a clear objective with several possible scenarios to achieve the objective, and the benefits and disadvantages of the proposed scenarios every year. The Commission should also have a range of management options. This would help CPCs make informed decisions about the level of risk associated with

¹ BIOFAD y / o FAD-Watch

adopting a measure, so they can also consider other aspects of the fisheries. This proposed change is a long-term goal to improve the way the Commission works, but it is important to begin analyzing and discussing the suggestion.

6. Implementing the Ecosystem Approach:

- ✓ Review the available bycatch data of all fisheries and continue to identify the information gaps;
- ✓ Produce estimates of total bycatch for the main incidental catch stocks (example or two) that are involved in all fisheries to identify future areas requiring IATTC's attention.

7. Strengthening Monitoring and Control:

- ✓ A record of active fishing vessels, including all fishing units that catch species under the IATTC Convention area;
- ✓ The implementation of a regional VMS scheme and the transmission of VMS data from all fishing units to the IATTC Secretariat or an independent Service Provider.

8. Compliance of the Contracting Parties

The members of the Commission should present a compliance action plan for the identified infractions. In addition, the IATTC should begin the discussion on how to respond to repeated and significant.

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