



WWF

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WWF OCEANS PRACTICE

WWF Position Statement for the 94th Meeting of the Inter-American Tropical Tuna Commission

Bilbao, July 22 – 26, 2019

Tunas populations support one of the most valuable fisheries in the Eastern Pacific Ocean (EPO) sustaining a billion dollar industry and the livelihoods of tens of thousands of people 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 EPO region while maintaining a healthy ecosystem and safeguarding the rich biodiversity of the region. WWF thanks the IATTC for allowing it to attend as an observer, and we ask that you consider our recommendations for the 94th meeting of the Commission:

1. Tuna Conservation

Tropical tunas (yellowfin and bigeye):

The stocks of these two species are managed on an effort limitation basis to ensure that the fishing mortality remains at the level that produces the maximum long term catches as required by the Convention. Last year, the IATTC scientific staff noted considerable uncertainty regarding the stock assessment of bigeye tuna. This year, the same has been observed with respect to the yellowfin assessment (DOCUMENT SAC-10-07). In the case of bigeye, all indicators, except catches, suggest an increase in mortality. This increase in mortality is attributed to the existence of greater number of FADs with satellite monitoring devices and echo sounders deployed, which improves efficiency resulting in an increase of sets on FADs (DOCUMENT SAC-10-06).

Responding to concerns of increased fishing pressure, the IATTC scientific staff, once again recommended measures in addition to the current 72-day closure to limit the fishing mortality of bigeye and yellowfin tunas (C-17-02). However, the scientific staff recommendations for combined limits on the total number of FADs and non-associated sets per year by class 6 vessels was interpreted by some as potentially leading to a race to fish and or to result in increased sets on dolphins. In May the Scientific Advisory Committee of the IATTC (SAC) did not reach consensus on this recommendation and requested that the scientific staff prepare various alternative scenarios to limit fishing mortality caused by the purse seine fleet.

WWF is supportive of all effective measures to reduce/limit fishing mortality, and associated safeguards to prevent a result in a race to fish. We recommend that the Commission adopt stronger measures to avoid an increase in fishing mortality from all fleets. One option for consideration is a limit on all sets that is assigned to each CPC or limits on sets per vessel. Other measures to control fishing pressure exerted by the fleet of purse-seine vessels could include a substantial reduction in the number of FADs that are placed in the water, further limits on the number of active FADs per vessel, further increasing the fishing closure length, uniform catch limits per vessel, individual catch limits per vessel or other management measures with similar benefits for conservation.

WWF suggests that stock assessments be adapted to the multi-year conservation plans, i.e., every 3 years. In this regard, it would be necessary for the Secretariat to prepare a proposal to be presented to SAC # 11, for an evaluation work plan that conforms to the multi-year management programs.

Pacific Bluefin Tuna:

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 Tuna-like Species in the North Pacific Ocean (ISC) and the IATTC, indicate that the Pacific Bluefin tuna stock remains in extremely poor condition. The stocks of Pacific Bluefin tuna had decreased to less than 20% of the peak time: the total amount of stock was 41,191 tons and the total amount of spawning stock biomass was 21,331 tons¹.

The ISC 18 working group identified some positive signs for this stock but recommends maintaining the current conservation measure. WWF also recommends IATTC to take a 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 that is scheduled for March 2020.

WWF continues to urge IATTC to adopt harvest control rules that are well-defined, pre-agreed, and contain mandatory actions for a determined course of management action in response to changes in indicators of stock status with respect to reference points through an ongoing MSE process.

2. Management of Fleet Capacity

Fleet overcapacity is the biggest threat to the stocks of tropical tunas in the EPO. WWF notes with concern that 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

¹ ISC Pacific Bluefin tuna Working Group, 2018. Stock assessment of Pacific Bluefin tuna, 2018. http://isc.fra.go.jp/pdf/ISC18/ISC_18_ANNEX_14_Pacific_Bluefin_Tuna_Stock_Assessment_2018_FINAL.pdf

ecological health of tropical tuna stocks but also has a negative impact on the profitability of the industry.

The overcapacity problem has become even more serious as authorized vessels have found ways to increase fishing pressure, e.g., by increasing sets and using more effective FADs. Future replacement of existing vessels with more efficient ones will further intensify this fishing pressure. 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 has repeatedly requested the IATTC member states finalize a management plan to eliminate overcapacity in its convention area. At the 2019 annual meeting in Bilbao, WWF urges the IATTC to adopt measures to reduce fleet capacity. Earlier resolutions submitted by the Japanese and the European Union delegations provide good frameworks to resume deliberations. Outputs from studies by WWF² and IATTC (Dale Squires) can inform these deliberations. The IATTC can implement measures that take a stepwise approach to elimination of overcapacity or adopt measures that more rapidly reduce excess capacity as described in the summary of the of the WWF study (attachment). Until this plan is adopted, WWF recommends that the IATTC take a precautionary approach and increase the seasonal closure to 103 days to account for the capacity increase in 2019, as calculated by the scientific staff of the IATTC (SAC-10-19).

3. Review of Harvest Strategies

Implementation of fishing policies that are precautionary and 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.

The current work to conduct a Management Strategy Evaluation for tropical tunas in the EPO undertaken by the IATTC staff 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.

WWF urges the Commission to create a working group dedicated to promoting dialogue between the main stakeholders. This action would facilitate the process of development and adoption of comprehensive harvest strategies.

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, and other key partners of the Common Oceans project, WWF will continue organizing several workshops on evaluation of management strategies directed to the tuna industry of the region.

² [https://www.iattc.org/Meetings/Meetings2018/SAC-09/CAP-19/English/CAP-19-INF-E\(a\)_Northern-Economics-Alternatives-to-Address-Excess-Capacity-in-the-EPO-PS-fishery-Executive-Summary.pdf](https://www.iattc.org/Meetings/Meetings2018/SAC-09/CAP-19/English/CAP-19-INF-E(a)_Northern-Economics-Alternatives-to-Address-Excess-Capacity-in-the-EPO-PS-fishery-Executive-Summary.pdf)

4. Management of FADS

WWF recognizes the efforts of the IATTC to improve the management of FADs through the establishment of maximum numbers of FADs deployed per 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 that addresses the collective best practices as outlined by the NGO Tuna Forum, i.e. a strategy that contemplates substantial improvements in the collection and reporting of data, technological innovation in bycatch mitigation and clarification of terminology related to fishing with FADs.

Very few countries are delivering complete and timely information on 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.

To reduce and minimize the impact caused by FADs in marine ecosystems, WWF recommends the swift transitioning to biodegradable and non-entangling materials, as well as designing recovery programs for FADs that include incentives to participate. We especially urge the commission to adopt additional mitigation measures that may be required for silky sharks (such as targeting FADs with large tuna aggregations >10t and avoiding hotspots).

WWF strongly recommends that the IATTC develops and implements science-based FAD set limits consistent with management objectives for tropical tunas, and science-based limits on the overall number of FADs deployed.

We further remind the Commission of the importance of adopting clear definitions of terms related to FADs, so that the FADs management measures can be followed and implemented in a fair and effective way, including the definitions of a FAD set and a non-associated set.

WWF notes with concern the allegations that small-class purse-seine vessels are used as auxiliary and supply vessels to deploy and / or maintain FADs, which is a clear contravention of resolution C-99-07 and address noncompliance through the Review Committee of the Commission. Failure to act on this aspect of management could lead to recognition of this issue as illegal, unreported or unregulated fishing.

5. Sharks and rays conservation

WWF urges the IATTC to urgently implement their scientific staff's 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 (DOCUMENT IATTC-94-03). The Commission should place special emphasis on improving data collection on the capture of CITES listed hammerhead sharks and silky sharks as well as other sharks caught in coastal longline and gillnet fisheries, high-seas longline fisheries, and small-scale purse seine fisheries. It would be highly beneficial for the IATTC to develop a long-term sampling program for shark fisheries in Central America.

WWF further urges the IATTC to adopt measures to mitigate the incidental catch and maximize the release survival of sharks, and to enforce the existing resolution on shark finning, and strengthen that resolution by requiring that all sharks be landed with fins naturally attached. WWF also requests the IATTC to follow the scientific staff's

recommendation to conduct a post-release survival tagging pilot study for Mobulid rays in all purse seine set types, following the guidelines in Annex I of Resolution C-15-04.

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

The low level information provided by some observer programs of member nations under the framework of Resolution C-11-08 illustrates that a 5% observer coverage is too low to accurately estimate the catch of infrequently caught species. WWF therefore supports the recommendations of IATTC 's scientific staff for a minimum of 20% observer coverage of large longline vessels until sufficient information is available to justify a revision (DOCUMENT IATTC-94-03) with the ultimate goal of reaching 100% monitoring through human and/or electronic means. WWF urges the Commission to enforce compliance with its existing 5% longline observer requirement and to identify and sanction non-compliant parties through the Review Committee.

WWF 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. This will strengthen stock assessment and improve the knowledge of the impact of these fishing vessels on the IATTC stocks.

WWF strongly supports the effort of the smaller fleet of Tunacons, which in the framework of a Fishery Improvement Project, carries observers on 100% of their fishing trips. All vessels fishing in the IATTC Convention area should follow the Tunacons example.

7. IATTC Transparency

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. The Review Committee needs to make information and action plans that address gaps in compliance publicly available in order to increase transparency, stakeholder engagement, pooling of resources to improve capacities, scrutiny and accountability.

WWF urges the members and cooperating parties to ensure that their fleets and fisheries are free from slavery and forced labour and poor labour conditions and that they have appropriate measures in place to eliminate these practices.

8. FAO Port State Measures Agreement

WWF urges IATTC Contracting parties to adopt port state measures at regional level, as has been done for instance in the CCSBT, IOTC, ICCAT and WCPFC, that align with the 2009 FAO Agreement on Port States Measures to prevent, deter and eliminate illegal, unreported and unregulated fishing (FAO PSMA). The Agreement has proven to be cost-effective tool to combat illegal, unreported and unregulated fishing by avoiding those products to enter the market. For this reason, WWF also asks in parallel all members that have not yet done so to ratify the 2009 FAO PSMA.

9. Mahi mahi research

The scientific staff led a major research project on mahi mahi since 2010, which culminated with the preparation of a stock assessment of mahi mahi in the EPO. The results were presented at the 7th SAC meeting of May 2016 and an analysis of alternative reference points and harvest control rules that was presented at the 10th SAC meeting of May 2019.

Given the importance of this fishery for coastal states, and based on the regional research experience carried out in recent years, WWF recommends that the IATTC incorporates into its regular work agenda, periodic investigations on the condition of the stock of mahi mahi in the EPO.

For further information:

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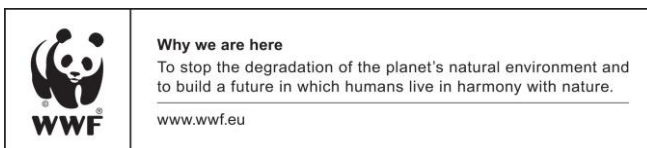
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Solving Overcapacity in Eastern Pacific Tuna Fisheries

Overcapacity in fishing fleets is a serious global problem that undermines the health of fish populations and the businesses that depend on these fisheries. Overcapacity is particularly evident in the purse seine sector targeting tropical tunas in the Eastern Pacific (EP), whose management is under the auspices of the Inter-American Tropical Tuna Commission (IATTC). The World Wildlife Fund Inc. (WWF) recently completed a study on the costs of overcapacity and methods to address this issue. The study analyzed the economic costs and benefits of eight capacity reduction programs. It will be used by IATTC in its preparation of a plan of action for EP tuna fleet capacity management. This fact sheet summarizes the study's results for solving overcapacity. The complete WWF study is available upon request.

SCOPE of the Problem

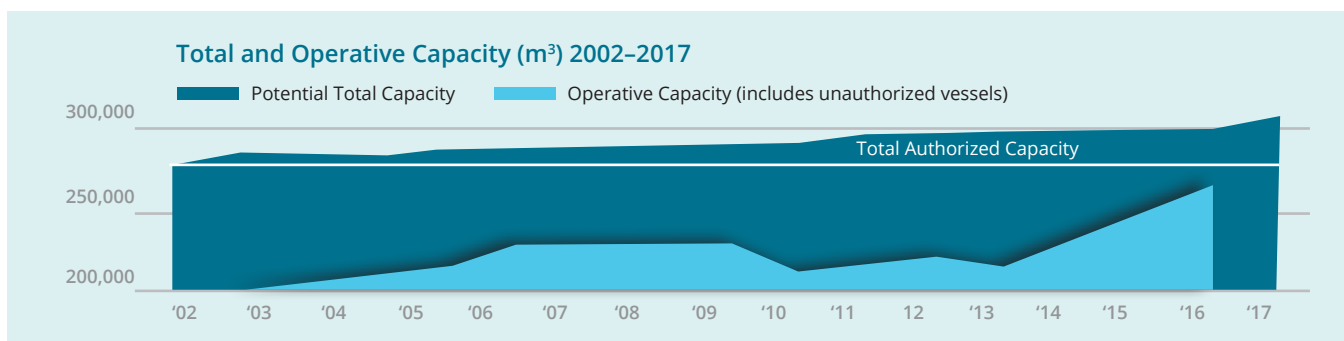
The substantial growth of fishing capacity of the tuna purse seine fleet operating in the Eastern Pacific in the last two decades has led to a current fleet capacity that is considerably in excess of the IATTC set target level of 158,000 cubic meters (m³) of well volume. In 2016, the total operative capacity was 264,859 m³ and potential total capacity was 296,415 m³.

Excessive capacity affects the ecological health of the EP tropical tuna stocks, and also has a negative impact on the profitability of the industry, conservatively estimated at \$47 million annually. The overcapacity problem is expected to become worse as more efficient vessels replace existing ones and latent capacity becomes active, which will require continuous increases in the seasonal closure.

Steps for getting to optimal fleet size in the shortest timeframe

- **Individual transferable quota (ITQ) approaches.** ITQs result in reduced fleet capacity (211,000 m³) that is above the IATTC optimum, but can be combined with other programs or redesigned to achieve the optimum.

The eight capacity reduction programs chosen for the WWF study were selected by the study team from reviews of relevant proposals submitted by Commissioners of the IATTC, and recommendations from meetings held under IATTC auspices and the project's advisory committee.



Engaging Industry

The study's analyses and technical reports were prepared by Northern Economics Inc. whose principal researchers worked closely with technical staff at the IATTC and vetted near final results with members of the purse seine fleet in Ecuador and Mexico. Industry also participated in the study by providing data for analysis and input on assumptions.

- **Industry-funded vessel buy-backs.** Analysis under different scenarios showed that post buy-back vessel revenue increased even after accounting for the repayment of a buy-back loan. For long-term effectiveness, buybacks need to be combined with other programs to continue the capacity reduction process or to prevent the build-up of capacity after the buyback. As with buy-backs, side payments can also be used to settle disputes or reach agreement on a long-term capacity reduction measure.

Steps that Take a Gradual Approach to Capacity Reduction

- **Members' choice.** Due to the diversity across members of the IATTC, one proposal examined the option of giving members themselves the choice of any method to reduce operative capacity by ten percent per year until the fleet achieves its optimum.
- **Uniform limits.** In combination with improved monitoring on the vessels and at the processing plants, uniform limits on small bigeye and yellowfin tunas for all vessels will constrain the least number of purse seine vessels.
- **Reduced capacity of replacement vessels.** The Japanese delegation presented a proposal to the IATTC that recommends additional removal of capacity whenever there is a request to reassign capacity on the IATTC Vessel Register. Japan's proposal (Prop-H-

2-JPN) will slowly decrease both the technological and actual vessel hold capacity. A modified proposal that would require new vessels to "retire" 40 percent of its equivalent capacity on the vessel register will reduce capacity to the optimum in 23 years.

- **Pilot programs.** Recognizing that some adaptations will be required to change behavior, the study also analyzed pilot programs on IVQs (transferable) and voluntary capacity reduction. The latter includes incentives such as reduction in the length of the closed season for member countries taking steps to reduce fleet capacity, with compensation paid by vessel owners benefiting from the shorter closed season to those who choose not to fish. Pathways to reform could incorporate such pilot programs, which once implemented would be modified and expanded using a stepwise approach to full adoption. Apart from incentives, improved accountability would be part of the pilot programs. Participants in a pilot IVQ program, for example, would have an exemption from the closed season and operate under increased monitoring. Similarly, vessels operating under a voluntary capacity reduction pilot program would receive the appropriate reduction in the closed season, and vessel owners not fishing would receive some compensation.

NEXT STEPS: Flexible Pathways to Reform

While the study examines proposals separately, it is clear there are different pathways to reform that can utilize a combination of these scenarios appropriately sequenced. The IATTC can make progress by adopting one or more of these proposals or build off analyses and adopt modified versions in its plan of action to manage fleet capacity in the Eastern Pacific. In addition, these assessments can be useful to other tuna producing regions grappling with problems of overcapacity.

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