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The Pew Charitable Trusts' Statement to the 98th Meeting of the Inter-American Tropical Tuna Commission August 2021

The Pew Charitable Trusts welcomes the opportunity to participate in the 98th Meeting of the Inter-American Tropical Tuna Commission. We appreciate the work of the Secretariat, Chair, and members to convene a virtual meeting due to the continuing extraordinary situation related to the COVID-19 pandemic.

It is critical for Parties to come prepared to adopt a new tropical tuna management regime early in the meeting, leaving room to discuss the other important items on the IATTC agenda. There have been two extraordinary sessions of IATTC since the most recent regular meeting when the Commission was unable to reach agreement on any management system for tropical tuna fisheries. The first ended with a rollover of 2020 management measures. Despite the clear advice of the Scientific Staff to take additional action to limit fishing mortality of bigeye tuna, there was no agreement on the long-term management of tropical tunas. The second extraordinary meeting was also unable to reach agreement on long-term management. As highlighted in the letter Pew sent to all delegations on 28 June, the immediate path forward should be for managers to **agree to a science-based, three-year measure for tropical tunas that bridges the current management scheme to future harvest strategies, to avoid costly, time-consuming management negotiations moving forward.**

Beyond this fundamental task, IATTC should make time at the August meeting to address the following four items:

1. **Endorse the Scientific Staff's workplans for:**
 - **The development of management strategy evaluation (MSE) for the tropical tunas** - At the direction of the Commission, the Staff has developed a multi-year workplan for the development of MSE for the tropical tunas, starting with bigeye, with an aim to present candidate management procedures for consideration by the Commission in 2023.
 - **An electronic monitoring (EM) program for longline fisheries** - The Staff has outlined a workplan for the development of an EM program, and sufficient time should be given to present their terms of reference to the Commission.

Both workplans should be quickly and unequivocally endorsed so the Staff can continue to proceed in the development of these valuable systems.

2. **Adopt the [proposal](#) from the European Union on implementation of port State measures.**

Ports in the IATTC Convention Area continue to be an opportunity for vessels engaged in illegal, unreported, and unregulated (IUU) fishing to offload illicit catch and merge it into otherwise legal supply chains. This practice is not only unfair toward legal fishing operations but also contributes to the deception of consumers. IATTC continues to lag behind other RFMOs in implementing measures that would prevent this activity from occurring. The proposal from the EU would require States to place tighter regulations on foreign-flagged vessels seeking to enter

and use their ports and would bring IATTC practice in line with other RFMOs and international best practice as laid out in the United Nations Food and Agriculture Organization (FAO) Port State Measures Agreement (PSMA). If adopted, the measure would also support developing States by providing a robust mechanism for the assessment of capacity needs in implementing the requirements and funding and technical assistance to bridge identified gaps. As more than half of IATTC 15 CPCs are already Parties to the PSMA and/or are implementing port controls as members of other RFMOs and proposals have been submitted to the Commission for consideration for several years, it is time for IATTC to adopt this proposal without hesitation.

3. Update Resolution C-12-07 to reform existing measures and increase oversight of transshipment activity in the IATTC Convention Area.

Transshipment continues to be a key part of the seafood supply chain in the eastern Pacific Ocean, particularly for high seas longline vessels. However, the remote nature of this activity makes it difficult for CPCs to monitor, creating another transfer point where IUU catch can be merged with legal product. There is a [proposal](#) from Ecuador that would ban high seas transshipment, and while this may be best practice until the Commission is sure that such activities are not an avenue for illegal fish to enter the supply chain, Pew encourages all CPCs to consider updates to the current transshipment measures – Resolution C-12-07 to close reporting loopholes, improve traceability, and reduce the likelihood of noncompliance with IATTC resolutions. We draw your attention to the papers Pew has submitted to the Commission and to the Compliance Committee, which detail specific recommendations based on two analyses of transshipment in the IATTC Convention Area.

4. Reject the recommendations of the Joint Working Group (JWG) on Pacific Bluefin Tuna Management, and instead adopt a more precautionary, science-based management measure in line with the Commission's mandate.

As can be reviewed in the letter Pew sent to participants (included below; English only), the 27-29 July meeting of the JWG was highly concerning. Despite the absence of new scientific advice, the recommendations would allow for catch increases of more than 30%. An increase in mortality of this magnitude is not in line with the scientific advice, is not precautionary, and would undermine IATTC's reputation. The JWG recommendations should therefore be rejected by the Commission in August, with the focus instead on ensuring that all mortality – commercial, recreational, and discard – is counted against the existing quota.

In addition to the above items, moving forward, it is important that IATTC prioritize adoption of a fully specified harvest strategy for north Pacific albacore. We are disappointed that no CPC has submitted a proposal to adopt a fully specified harvest strategy for north Pacific albacore, despite the work completed by the ISC and the advice of the SAC. Given IATTC's commitment to harvest strategies as a way forward for stock management, it is important to build on any completed MSE by adopting a new management measure based on the results. At a minimum, we urge members to consider this item at the October meeting after WCPFC's Northern Committee has considered the same issue for the western Pacific.



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July 29, 2021

Letter to the Joint IATTC-NC Working Group on Pacific Bluefin Tuna Management

Dear Co-chairs Miyahara and Lowman and Joint Working Group Delegates,

On behalf of The Pew Charitable Trusts, I am writing to express our concern regarding the outputs of the above named Joint Working Group (JWG).

The meeting went well over the time allotted, and an intervention from The Pew Charitable Trusts may not have been welcomed at that late hour. For this reason, and as registered observers to both Commissions, we are sharing our concerns more formally here.

The outcomes of this working group are critical to the future of Pacific bluefin. While time constraints and the impact of the pandemic on meeting feasibility are difficult to navigate, the process and proceedings are of significant concern, as follows:

- Much of the early negotiation occurred in a closed small group meeting that was tasked with procedural matters, not substantive negotiations, countering all international guidance on transparency in international governance;
- Total allocations were repeatedly increased in order to achieve consensus, despite acknowledgement of the severely depleted status of the stock and the need to rebuild;
- There was a lack of attendance at this meeting by key JWG members whose voices were thus not heard on substantive matters.

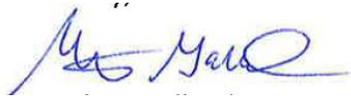
This increase in catch limits is especially egregious in the absence of new advice from ISC, WCPFC SC, or IATTC SAC. The latest advice from those bodies is consistent with previous advice that resulted in rejection of similar proposals in previous years. Given there has been no change, this decision to depart from this advice is of great concern: the endorsed measures will allow for increase in catch of Pacific bluefin by more than 30%. For the most depleted tuna species in the world, with a population less than 5% of its historic size, that is an unacceptable increase in mortality.

As the JWG's recommendations will be considered by both Commissions, there is an opportunity for this dangerous and unscientific increase in mortality to be rejected in favor of a more precautionary measure.

In closing, this lack of transparency, lack of adherence to scientific advice, and lack of attendance of key JWG members all demonstrate that Pacific bluefin tuna is in need of a simulation-tested, fully specified harvest strategy that uses science to guide the species through recovery and into a sustainable future.

We request that this letter be appended to the meeting report, and we wish to inform you that we intend to make our concerns available to the public.

Thank you,

A handwritten signature in blue ink, appearing to read "Grantly Galland". The signature is fluid and cursive, with a large initial "G" and a distinct "Q" at the end.

Grantly Galland
Senior Officer, RFMO Policy
The Pew Charitable Trusts