

8 October 2015

WCPFC Members and Cooperating Non-members
c/o Feleti P. Teo OBE, Executive Director
Western and Central Pacific Fisheries Commission
Kolonias, Pohnpei State
Federated States of Micronesia

Re: Tuna MSC Alignment Group Position Statement to WCPFC12

Dear Mr. Teo,

As participants of the Western and Central Pacific Ocean (WCPO) Tuna Marine Stewardship Council (MSC) Alignment Group, we the undersigned seafood companies and catch sector associations are committed to the long-term ecological and socioeconomic sustainability of tuna fisheries in the Convention Area of the Western and Central Pacific Fisheries Commission (WCPFC). Our objective is for all WCPO tuna fisheries to be able to pass an assessment against the MSC standard, and for fisheries already MSC certified to be able to meet all conditions of certification. The achievement of this standard is increasingly needed to be competitive in the market. Meeting the MSC standard requires that fundamental elements of modern fisheries management required by the WCPFC Convention, UNCLOS and the UN Fish Stocks Agreement, are adopted by WCPFC. Doing so would support the long-term sustainability of WCPO tuna stocks and of associated and dependent species, and contribute to the stability of pelagic ecosystems in the WCPFC Convention Area (CA). Robust harvest strategies, including maintaining stocks near target reference points, may also contribute to a stable supply of tuna products to global markets, possibly reducing volatile price fluctuations and suboptimal economic yields.

To address regional-level deficits when assessed against the MSC standard, we request WCPFC CCMs to take the following actions at WCPFC12:

- **Harvest strategies:** Adopt robust and precautionary harvest strategies¹ for all main market tuna species. This includes the urgent need for the adoption of formal reference points and harvest control rules, which would ensure that if a target reference point (TRP) or limit reference point (LRP) were exceeded, a pre-agreed response would be taken to bring the stock back to within the TRP and above the LRP in a fully effective and timely way.
- **Bigeye harvest control measures:** Adopt additional or alternative measures that substantially increase the likelihood of achieving stock management objectives for bigeye tuna, including considering purse seine bigeye quotas by CCM, reductions in purse seine and longline capacity, and steps to ensure CCM compliance with existing and new control measures while providing mechanisms to meet developing states' fishery development aspirations. The 2014 WCPO bigeye tuna fishing mortality did not decrease according to scientific recommendations to enable rebuilding, but instead increased. The total number of FAD sets in 2014 was still higher than in 2010, the reference year used in the current tropical tuna CMM.
- **FAD management:** Adopt a CMM that requires: (i) the deployment and position of all drifting FADs in the WCPFC CA to be reported to the WCPFC Secretariat, (ii) all anchored and drifting

¹ A robust harvest strategy is a framework that specifies the pre-determined management actions for fisheries that catch this stock that are necessary to achieve agreed biological, ecological, economic and/or social management objectives. The harvest strategy includes 6 main elements: (i) management objectives – including timeframes, (ii) stock-specific target and limit reference points, (iii) acceptable levels of risk of exceeding the reference points, (iv) a monitoring strategy, (v) harvest control rules – pre-agreed decisions that aim to stay near targets and to not exceed limits and include actions that are to be taken if reference points are exceeded, and (vi) an evaluation of whether controls are achieving management objectives.

FADs to be marked to identify ownership, and (iii) the positions of all drifting FADs to be tracked by both the owner and relevant CCM domestic management authority.

- **Replacement south Pacific albacore CMM:** Adopt a replacement south Pacific albacore CMM, establishing, as one component of a robust harvest strategy, a management framework, including a harvest control rule, designed to constrain fishing mortality rates and biomass to levels consistent with socioeconomic and ecological sustainability objectives. Assess the performance of CMM 2010-05 by determining if the number of CCM fishing vessels actively fishing for south Pacific albacore in the WCPFC CA south of 20° S. is above or below the 2005 level or the average of 2000-2004 level. If individual CCMs are determined to have not been in compliance, then design the replacement CMM to bring them into compliance by WCPFC13.
- **Obstacles to meeting minimum observer coverage rate:** Identify CCMs that have not achieved the minimum 5% observer coverage rate for relevant fisheries under CMM 2007-01 and conduct assessments to identify obstacles and alternative solutions and report back to SC12.
- **Scientifically-based observer coverage rates:** Request that the Secretariat of the Pacific Community (SPC, the WCPFC scientific services provider) conduct a study to determine whether the minimum 5% coverage rate under CMM 2007-01 is adequate for each regional fishery to provide required information to meet scientific objectives of analysis. The 5% minimum coverage rate adopted by WCPFC was not based on an analysis of scientific information requirements. The fishery-specific objectives of analyses (e.g., required levels of accuracy and precision of catch rate estimates), frequency of occurrence of catch for each species of interest including species of conservation concern that may be rare catch events, amount of fishing effort, and distribution of catch and bycatch should determine onboard human and electronic observer coverage rates and sampling methods. The Inter-American Tropical Tuna Commission Scientific Advisory Committee reiterated in 2015 its recommendation for 20% observer coverage of large longline vessels until information becomes available sufficient to support a rigorous evaluation of the adequacy of the current 5% coverage rate.²
- **Improved longline observer data collection methods:** Adopt SC11 recommended changes to longline observer data collection standards (SC11 Attachment I).
- **Determine adequacy of harvest controls for shark and billfish stocks of conservation concern:** Request that SPC provide advice to WCPFC13 on the performance of existing CMMs or otherwise the need for the adoption of new CMMs for shark and billfish stocks to meet stock-specific management objectives, including rebuilding stocks that are overfished or reducing fishing mortality rates for stocks that have overfishing occurring, or are data-deficient and require precautionary harvest strategies.
- **Elasmobranch LRPs:** Request SPC to identify appropriate LRPs for stocks of shark and ray species of highest conservation concern, most urgently for silky and oceanic whitetip sharks.
- **Replacement shark CMM:** Adopt a replacement shark CMM that requires fins to be naturally attached for all retained sharks, given limitations with compliance with the shark 5% ratio of fin weight to shark carcass weight of the existing CMM. And adopt measures to further reduce shark fishing mortality, such as banning the use of *both* 'shark lines' and wire leaders, where appropriate.
- **Replacement seabird CMM:** Adopt a replacement seabird CMM, eliminating the exclusion for small longline vessels (empirical evidence indicates that vessel size does not significantly explain nominal or standardized seabird catch rates, and that mitigation methods can be practically implemented on vessels of all sizes), and extending the area where seabird bycatch mitigation measures are required further equatorward from the current 30° S. boundary.
- **Handling and release standards:** Adopt minimum standards for handling and releasing sea turtles, sharks, rays, marine mammals and seabirds that maximize the probability of post-release survival while minimizing safety risks to crew. Invite CCMs and longline vessel captains to make

² See Item K in <https://www.iattc.org/Meetings/Meetings2015/6SAC/PDFs/SAC-06-11-Conservation-recommendationsREV.pdf>.

use of open-source training materials, available at <https://sites.google.com/site/seafoodcompaniestunamanagement/home/training-materials-for-longline-fishers>, and to use relevant training materials developed by the International Seafood Sustainability Foundation, including skipper guidebooks that contain both guidance on handling and release best practices and species identification guides, available at <http://www.issfguidebooks.org/>.

- **WCPFC process to respond to CCM non-compliance:** Adopt a process for WCPFC to assess penalties for CCM non-compliance with CMMs and other obligations under the convention, and ensure that there is full transparency in WCPFC's Compliance Monitoring Scheme processes.

We request that you kindly circulate this letter to all WCPFC Members and Cooperating Non-members.

Yours sincerely,



ANOVA Technical Services LLC



Blueyou Consulting LTD



 Fiji Tuna Boat Owner's Association


 15/
International Pole & Line Foundation



Luen Thai Fishing Venture



Yayasan Masyarakat dan Perikanan Indonesia
 Masyarakat dan Perikanan Indonesia (MDPI)



Meliomar



Norpac Fisheries Export


 15/
Pacific Islands Tuna Industry Association



Tuna Management Association of New Zealand



Walker Seafoods Australia