



ISSF POSITION STATEMENT

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CMM 2014-01, bigeye and skipjack tuna. No new assessment of bigeye tuna was conducted in 2015. However, bigeye catches continue to increase, and therefore it is expected that overfishing continues and the stock is still below the Limit Reference Point adopted by the Commission. The number of FAD sets in the purse seine fishery in 2014 was 5% above the recent average, despite the 3-4 month FAD closure in the CMM. In addition, the longline fishery has a similar impact on the reproductive capacity of the stock as the purse seine fishery does. Overall, fishing mortality on the stock needs to be reduced by about 36% in order to end overfishing. CMM-2014-01 is overly complex and has too many exemptions and optional clauses, which render it ineffective and difficult to enforce. The WCPFC could consider adding other incremental measures to the CMM (such as extending the FAD closure period, limiting the number of FAD sets made each year or the number of FADs that each vessel uses), but this is what has been done since 2009 and it is clearly not effective.

- ***ISSF urges the WCPFC to eliminate the exemptions in the CMM and to adopt management measures that are effective and easier to enforce or a reduction in fishing effort, to meet the objective of ending the overfishing of the bigeye stock.***

Regarding **skipjack** tuna, the stock is within the range of the candidate Target Reference Points (TRP) being considered by WCPFC. But, catches continue to increase, with the 2014 purse seine catch being the highest on record. ***ISSF urges WCPFC to limit fishing effort (fishing days) in the purse seine fishery to a lower level that will maintain skipjack within the range of candidate TRPs and significantly reduce the catch of bigeye.***

Harvest Control Rules (HCRs) and Reference Points. HCRs are a set of well-defined management actions to be taken in response to changes in stock status with respect to target and limit reference points. ISSF endorses the application of the Precautionary Approach using clear target and limit reference points and HCRs, as called for by the UN Fish Stocks Agreement and by some RFMO Conventions. The WCPFC has made important progress adopting limit reference points for skipjack, bigeye, yellowfin and South Pacific albacore, as well as a plan to establish Harvest Strategies for key fisheries and stocks. The WCPFC needs to implement this plan and adopt harvest strategies, including target reference points and harvest control rules for these same stocks.

- ***ISSF strongly supports the PNA proposal to set the target reference point for skipjack at 50% of the unfished biomass and urges WCPFC12 to adopt this measure before the stock declines to a level where making such a decision will be much harder.***

Compliance and Data Gaps. ISSF notes with concern the SC11 information about the lack of operational data for longline fleets in the high seas, which affected the quality of the bigeye assessment reported at SC11. ISSF notes the SC recommendation that a new agreement be developed at TCC that

will allow SPC to retain the operational-level data provided by several CCMs, rather than being required to delete those data after the assessment work is completed.

- ***ISSF urges the WCPFC to develop such an agreement with the concerned CCMs as transitional policy.***
- ***However, ISSF maintains that all CCMs must meet their obligations regarding data submissions and provide these operational data to the Commission by the agreed deadlines and in the correct formats.***
- ***ISSF further urges the Commission to consider appropriate responses to promote compliance by those CCMs who have not yet provided operational catch and effort data.***

ISSF also continues to be concerned with the lack of transparency in the WCPFC Compliance Monitoring Scheme (CMS). In contrast to the other four tuna RFMOs, observers are not allowed in the CMS working group meetings and the responses of members to identified non-compliance are not released publically. Member reports on the implementation of WCPFC measures, known as *Part II reports*, are also confidential.

- ***ISSF urges the Commission to reform its CMS process so that accredited observers may attend the working group meetings and information on CCM's plans to address the areas of identified non-compliance be made public.***
- ***ISSF also supports the development of a scheme of responses to non-compliance by the Commission as soon as possible.***

Fish Aggregating Device (FAD) Management. FADs are one of the most important fishing methods for tropical tunas. However, there are huge gaps in all T-RFMOs regarding the number of FADs being used and on details of fishing operations on individual FADs. Observer programs can be used to collect much -- but not all-- of the information needed to appropriately monitor FADs. The WCPFC has adopted Minimum Standard Data Fields for observers that contain much of this information. However, there are some types of information that an observer is unlikely or unable to collect, such as FAD markings or details on the FAD design. This is information that vessel captains can easily collect, but observers cannot do so routinely.

- ***ISSF urges the WCPFC to expand the information required from vessels to include data on FAD deployments, designs, equipment and identification marks.***
- ***ISSF welcomes the creation of a Working Group on FAD management options. However, the virtual Working Group has made little progress in 2015 and therefore ISSF recommends that the Commission consider holding an in-person meeting to make faster progress.***

Transparency in Access, Joint Venture and Chartering Arrangements. ISSF recognizes the importance of access and chartering or joint venture arrangements to the development aspirations of developing States, in particular small island developing States. It is also equally important for accurate stock assessments and effective compliance and enforcement that there is clarity regarding catch attribution and the responsible party for MCS regarding vessels under chartering or access arrangements.

- ***ISSF urges the WCPFC to adopt measures to promote transparency in access agreements and chartering or joint venture arrangements that are similar to existing IOTC and ICCAT measures***

Sharks. ISSF welcomes the adoption of mandatory shark mitigation methods (CMM-2014-04) for longline fisheries targeting tunas and billfishes.

Longlining and Transshipment. ISSF notes with concern the low levels of observer coverage (data indicates that coverage rates may be less than the required 5%) and the failure of some CCMs to provide the required transshipment reports or advance notifications. ISSF notes that electronic monitoring systems are being tested and developed which could potentially be used to address some of these problems. **ISSF urges WCPFC12:**

- *To impose and enforce, as a precautionary measure, measures to limit longliner capacity in the Convention Area. ISSF also urges the Commission to task its scientific body to make recommendations regarding the levels of longline capacity consistent with sustainable management of target tuna stocks.*
- *To amend its transshipment measure (CMM 2009-06) in order to address these significant gaps in its effectiveness, which affect traceability of the products and could result in IUU fishing.*
- *To strengthen CCM compliance with the existing 5% observer coverage requirement by identifying and sanctioning non-compliance through the CMS.*

Port State Measures: ISSF urges all Members that have not yet done so to ratify the 2009 FAO Agreement on Port State Measures to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing.

Closed Vessel Registries and Management of Fleet Capacity. Experts agree that there is overcapacity in the global tuna fleets. Fishing fleet overcapacity increases pressure to weaken management measures and eventually leads to stock overexploitation. SC11 reviewed preliminary estimates of potential tropical purse seine fleet sizes given existing effort limits and candidate skipjack target stock levels. These analyses indicate that there is overcapacity in the WCPO purse seine fleet. Therefore, **ISSF continues to be concerned with the growth of fishing capacity in the WCPO region, which has not been curtailed through the provisions adopted in CMM 2014-01. ISSF urges the WCPFC to:**

- *Establish limited entry through closed vessel registries and to develop a common currency to measure fishing capacity, such as cubic meters of well volume.*
- *Support the Kobe III call for creating mechanisms to transfer capacity to developing countries. ISSF hosted a Workshop in March 2014 to start a dialogue on this issue. ISSF hopes this Workshop will contribute to progressing capacity management in the tuna RFMOs. The workshop report can be accessed here: <http://iss-foundation.org/resources/downloads/?did=522>*

These steps should be taken now, since scaling back purse seine fleet capacity will become even more difficult as new vessels are introduced.