



ISSF POSITION STATEMENT

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Inter-American Tropical Tuna Commission
in La Jolla, CA, USA

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The **International Seafood Sustainability Foundation (ISSF)** is a global partnership among the tuna industry, science and WWF, the global conservation organization. Our mission is to work toward the science-based conservation and management of tuna stocks and the protection of ocean health by supporting regional fisheries management organizations and advocating for the recommendations of each organization's scientific advisory body.

The first part of our statement addresses three of the most important issues facing global tuna sustainability: (1) harvest strategies (also known as 'Management Procedures', which include Harvest Control Rules (HCR) and reference points), (2) fleet capacity, and (3) the management of FADs. The second part addresses challenges specific to the IATTC.

1. Harvest Strategies. In 2014, the Commission adopted interim target and limit reference points and an interim HCR for tropical tunas and directed further work through the Scientific Staff and Scientific Advisory Committee (SAC) to test their robustness through management strategy evaluations. In 2016, the Staff is recommending a more complete HCR for tropical tunas that uses a limit reference point in addition to a target reference point. **At this year's meeting ISSF:**

- ***Urges the Commission to adopt the interim HCR recommended by the Staff and to require that it be tested for robustness to the main uncertainties in the assessment, such as the stock-recruitment relationship.***

2. Closed Vessel Registries and Management of Fleet Capacity. Though the IATTC is the only tuna RFMO with a closed vessel registry, its current capacity is well in excess of resource productivity. Operative purse seine capacity is estimated to have increased by 25,000 m³ since 2015 due to latent capacity being activated. **In order to further progressing the management of fishing capacity, ISSF:**

- ***Urges the IATTC to implement the recommendations from the 2014 Technical Experts Workshop on the Capacity of the Tuna-fishing Fleet in the EPO in order to strengthen the 2005 Plan for the Regional Management of Fishing Capacity and reduce the current capacity that is well in excess of resource productivity.***
- ***Encourages the IATTC to consider the outcomes of the 2014 ISSF workshop on the transfer of fishing capacity from developed to developing countries in any regional capacity management scheme. The workshop report can be accessed at: <http://iss-foundation.org/what-we-do/areas-of-focus/capacity-management/>***

3. Fish Aggregating Device (FAD) Management. Setting on FADs accounts for nearly 40% of global tuna catches and 50% of global skipjack catches. The time is ripe for a concerted global effort to gather and report to RFMOs data on FADs (e.g., via logbooks) in order to better monitor FAD usage and to establish a sound basis for their management in every ocean region. **ISSF remains disappointed that the substantial progress made by the IATTC in 2013, with the adoption of Resolution C-13-04 regarding FAD management and reporting, was undone last year when the Commission delayed -- until 2017 -- the FAD data collection requirements and -- until 2019 -- the provision of FAD management recommendations.** ISSF applauds any IATTC fleets that have begun providing FAD data consistent with the original Resolution C-13-04.

ISSF is pleased that the ad hoc Working Group on FADs had its first face-to-face meeting immediately following the SAC. To progress the collection of FAD data and adoption of science-based FAD management measures, ISSF:

- ***Encourages the IATTC to accelerate the process of agreeing to a comprehensive monitoring and management measure for FADs. At the same time, IATTC should consider the possibility of using data collected by FADs for scientific monitoring of tuna stocks.***
- ***Encourages all CPCs to implement as soon as possible the provisions in Resolution C-15-03 regarding the use of non-entangling FADs designs to reduce the incidence of entanglement of bycatch species, using biodegradable material as much as possible, based on the principles outlined in Resolution. This is a critical step in the reduction of shark mortality and reduction of other ecosystem impacts in the eastern Pacific Ocean.***

4. Tuna Stocks

The 2016 stock assessments by IATTC staff indicate that **yellowfin and bigeye** have been experiencing fishing mortality levels slightly below the MSY level in recent years. However, operative capacity of the purse seine fleet as of April 2016 has increased by 11% over the previous three years. Such an increase in capacity will most likely translate into overfishing of the stocks into the future, unless IATTC adopts management measures to compensate for it.

- ***ISSF urges the Commission to adopt measures to avoid an increase in fishing mortality for all fleets. Such measures could include extending the length of the purse seine fishery closure, and/or extending the time/area closure known as "El Corralito".***

The stock of **Pacific bluefin** tuna is in a dire state. Projections based on the management measures adopted by both IATTC and WCPFC suggest that the stock could grow slowly as long as there is not a decrease in recruitment levels.

- ***ISSF urges that, at a minimum, IATTC extend the current measure into the future and require that the stock be assessed annually so as to monitor it closely. IATTC should also encourage WCPFC to adopt additional measures to decrease mortality on adult bluefin.***

5. IATTC Compliance, VMS and purse seine and longline observer coverage. The IATTC must improve its transparency regarding the levels of compliance by members with their obligations to the Commission. In addition, improvements are needed to strengthen IATTC's monitoring, control and surveillance tools, such as its VMS and IUU Vessel List measures. **ISSF urges the IATTC to:**

- *Set clear milestones for improving compliance by requiring CPCs 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.*
- *Adopt of amendment to C-11-07 to increase the transparency of the IATTC compliance process by making public the responses from members to areas of identified non-compliance, increasing the level of detail in the Review Committee report regarding the specific areas where members and CNMs are non-compliant and its recommendations to address such non-compliance.*
- *Continue to reform its satellite-based VMS by amending C-14-02 to ensure that VMS data can be available to the Secretariat and be used for scientific or compliance purposes.*
- *To adopt the recommendation of the Staff and the SAC to increase observer coverage on longline vessels to 20% over a five year period, and at the same time strengthen compliance with the existing 5% longline observer coverage requirement by identifying and sanctioning non-compliance through the Review Committee.*
- *To require 100% observer coverage (human or electronic) on IATTC capacity classes 4 and 5 purse seine vessels, where not already required under the AIDCP and/or in force IATTC Resolutions.*

6. Sharks, Mobulid Rays, sea turtles and sea birds

In 2016, the Staff and SAC made a number of recommendations to mitigate the bycatch of vulnerable species in both purse seine and longline fisheries. **At this year's meeting ISSF:**

- *Strongly supports the adoption of measures to mitigate incidental catch and maximize release survival of these species. At the same time, ISSF urges the IATTC to improve the monitoring of all tuna fisheries that do not have adequate levels of observer coverage, such as small and medium-size purse seiners and longline vessels. Adequate monitoring of all fisheries is required to ensure implementation.*
- *Urges the Commission to take immediate steps to enforce the existing resolution on shark finning, and strengthen that resolution by requiring that all sharks be landed with fins naturally attached.*