

June 20, 2016

Dear Delegates,

This letter is submitted on behalf of the undersigned non-governmental organizations and fishing industry organizations with an interest in the Inter-American Tropical Tuna Commission (IATTC or Commission) and its upcoming 90th meeting in La Jolla, California.

Collectively our organizations engage with national governments, civil society, and RFMOs as well as provide information and advice to suppliers, retailers, buyers and food service sectors regarding improvements in the sustainability of tuna fisheries, reducing bycatch and promoting ecosystem health. In addition, the undersigned industry organizations represent vessels active in tuna fisheries. We recognize that the long-term sustainability of tuna stocks is integral to businesses, regional food security, and the health of the marine environment. Therefore, we wish to underscore our strong interest in concrete management actions for the sustainability of tuna stocks and the marine ecosystem at the Commission meeting scheduled for June 27-July 1 in La Jolla, California.

We urge governments to propose and adopt sound, precautionary management measures in line with the latest advice from the IATTC Scientific Staff and the IATTC Scientific Advisory Committee (SAC), particularly the harvest control rules and reference points that are fundamental to the conservation of yellowfin, bigeye and Pacific bluefin tuna, as well as basic safeguards for sharks, sea turtles, and seabirds.

Harvest Control Rules

We support the Commission's efforts to adopt fundamental science-based management measures to ensure the sustainability of tuna populations in the Eastern Pacific Ocean, and we request your support for additional management reforms. We also support the application of the Precautionary Approach using clear target and limit reference points and harvest control rules (HCRs), as called for by the United Nations Fish Stocks Agreement. Harvest control rules are a set of well-defined management actions to be taken in response to changes in stock status, and include appropriate, biologically-based reference points.

In 2014, the Commission adopted interim target and limit reference points and an interim HCR for tropical tunas. However, we are concerned that last year the Commission failed to adopt the recommendations of the IATTC Scientific Staff for a more complete HCR that takes the limit reference points into account. In addition, the Commission has not made progress on establishing reference points and HCRs for other tuna species (e.g., bluefin and albacore tunas).

As you prepare for the upcoming 90th Meeting of the Commission, we urge governments to:

- Support proposals that adhere to the scientific advice provided to the Commission this year by the IATTC Scientific Staff and the IATTC Scientific Advisory Committee;
- Ensure that, conservation and management measures for tropical tunas include a

more complete HCR that uses a scientifically-based limit reference point in addition to a target reference point;

- Advance proposals that will establish appropriate, science-based target and limit reference points and HCRs for other tunas; and
- Require all HCRs to be tested for robustness to the main uncertainties in the assessments, such as the stock-recruitment relationship, age at maturity, natural mortality and other key biological parameters.

Capacity

We also note with concern that the 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 yellowfin and bigeye stocks into the future, unless IATTC adopts management measures to compensate for it. We therefore, urge governments to support the adoption of additional measures for tropical tunas for all fleets to avoid an increase in fishing mortality. Such measures could include extending the length of the purse seine fishery closure, implementing a quota management program and/or extending the time/area closure known as "El Corralito".

Pacific Bluefin Tuna

Further, we underscore that the stock of Pacific bluefin tuna is in a dire state. The stock is severely overfished with overfishing occurring, and model projections may not be reliable given uncertainty associated with key model parameters and the threat of continued low recruitment. We urge the Commission to develop a science-based, long-term and Pacific-wide management framework that will end overfishing and rebuild Pacific bluefin tuna populations to a level that can produce maximum sustainable yield. In addition, we encourage the Commission to extend the current Resolution (C-14-06) into the future and require that the stock be assessed annually so as to monitor it closely.

Sharks

Silky sharks are also in serious need of management action. As an interim step, as data and assessments improve, we urge the Commission to adopt the recommendations from the IATTC Scientific Staff: three-month closures for targeted silky shark fisheries and size, total weight, and gear limits for vessels that take them incidentally. Further, we urge Resolution C-05-03 be amended to require that all sharks be landed with fins naturally attached.

Observer Coverage

Finally, observer coverage is fundamental for the proper collection of essential catch data for stock assessments and the implementation of conservation measures for tuna and sensitive species, such as sharks, seabirds and sea turtles. We recognize that IATTC members have set a high bar of observer coverage in the large-scale purse seine fishery. However, improvements are needed for longline vessels. We urge the IATTC 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

We respectfully request IATTC members to take these actions at the upcoming Commission Meeting as a matter of priority.

Sincerely,



David A. Wiedenfeld



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