



WWF

POSITION

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Smart Fishing Initiative

WWF POSITION

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Introduction

The World Wide Fund for Nature (WWF) would like to thank the Western and Central Pacific Fisheries Commission (WCPFC) Northern Committee (NC) for the opportunity to attend the 10th Regular Session of the NC (NC10) as an observer and to address the critically important role that it plays in the proper management of the Western Central Pacific Ocean (WCPO) fisheries.

Conservation of these ecologically and economically important fishery resources ultimately depends on the adoption of science based and precautionary management measures for tuna and tuna-like species. This is the greatest challenge that the WCPFC faces, and the greatest responsibility that it must meet.

WWF would like to call on members, participating territories and cooperating non-members of WCPFC to take heed to the issues and recommendations raised at International Scientific Committee for Tuna and Tuna-like Species in the Northern Pacific Oceans (ISC) and from meetings of the other WCPFC Committees.

Reference Points and Harvest Control Rules

WWF remains supportive of the continued work of the WCPFC and subsidiary bodies in pursuing the implementation of Reference Points (RPs), Harvest Control Rules (HCRs), and Harvest Strategies (HS). At this meeting, WWF encourages NC10 to further endorse and support the adoption of explicit Limit Reference Points (LRPs) and Target Reference Points (TRPs) for all WCPO fishery stocks under WCPFC authority as well as consider steps toward implementation of effective HCRs.

Reference points provide management decision-makers an objective tool to determine whether a fish stock size is becoming too small or fishing pressure is becoming too great. WWF notes that the WCPFC has discussed and considered RPs since 2006 and that, while the NC has made several recommendations to the WCPFC on appropriate RPs, the WCPFC has failed to adopt formal explicit RPs. Furthermore, while stock assessments conducted by SPC use B_{MSY} and F_{MSY} as implicit limit reference points and provide advice to the WCPFC, these proxies do not represent limits consistent with the recommendations of the United Nations Fish Stocks Agreement (UNFSA) and more refined RPs are justified based on the available scientific information.¹

WWF acknowledges the complexity of establishing TRPs, given the multiple factors that go into their consideration. However, while TRPs require additional consideration of socio-economic concerns, current understanding of the biological and socio-economic conditions does not prevent the implementation of sufficiently precautionary interim TRPs at this time. Thus, WWF encourages the NC to recommend precautionary interim TRPs which would serve as advisory benchmarks under which more refined TRPs could be established. Most significantly, all the necessary information to implement such a benchmark TRP currently exists.

In addition to implementation of LRPs and TRPs, WWF recommends the NC support fisheries management through pre-agreed management actions, or specifically, Harvest Control Rules (HCRs), that trigger management actions when stock status indicators reach pre-defined LRPs and TRPs.

At its most basic, an HCR is simply a pre-agreed action, or set of actions, to be taken by a management body that are designed to achieve a medium or long-term TRP while avoiding reaching a LRP. Simple HCRs can be described as an "if, then" statement. An example of a very simple Harvest Control Rule would be "if the fishery stock level falls below the target level, then the level of fishing must be reduced by 20%." Managers may also agree in advance what the specific management actions are to reach that 20% reduction in the level of fishing, such as a regional closure or gear restriction.

Implementing HCRs puts in place clear decision rules which minimize excessive debate and allow managers to act quickly and decisively when the fishery reaches a pre-defined threshold. Furthermore, HCRs lay the foundation for developing well-defined fisheries management plans that are grounded in sound science.

The NC should strongly recommend the implementation of LRPs, TRPs, and HCRs as a priority for the sustainable management of the fishery resources in the WCPO. Existing science supports the implementation of well-defined and precautionary biologically-based LRPs and WWF generally supports the previous recommendations of the NC.

WWF recommends that the NC:

- Support the designation of LRPs and TRPs as a priority for proper management of all stocks under its authority;
- Further recommend precautionary B-based LRPs² (preferably based on Spawning Biomass)³ for all WCPO fish stocks under its authority;
- Endorse adoption of precautionary F-based LRPs as an *interim* measure to attempt to control the exploitation rate for all WCPO fish stocks under its authority;⁴

- Urgently adopt explicit LRPs and TRPs for the two key northern tuna species, Pacific Bluefin tuna and Northern Albacore, as a priority for the sustainable management of these resources in the Northern Pacific Ocean;
- Recommend interim precautionary TRPs as a benchmark for further consideration by the WCPFC in 2014;
- Consider the probability of breaching the LRPs and limit this to 10% or less as a precautionary measure;⁵ and
- Develop and implement HCRs that ensure the transparent and efficient management of stocks in relation to LRPs and TRPs.

Northern Stocks

Pacific Bluefin Tuna

Technical reports of both the ISC and the IATTC indicate that the North Pacific Bluefin tuna stock is in extremely poor condition. The ISC confirmed that overfishing is occurring, the stock is heavily overfished, and its spawning stock biomass has declined by as much as 96%.

This is a clear indicator that the management measures taken both in the Western and Central Pacific and in the Eastern Pacific are proving insufficient to conserve the biological integrity of this stock. The IATTC and WCPFC must assume their share of responsibility.

WWF maintains strong concerns regarding this stock with an aim of restoring and rebuilding this ecologically, sociologically, and economically important fishery resource. The current science strongly indicates that there is only one reproductive cohort that is reaching the end of its life. Additionally, about 90% of the stock fished is young fish that have not yet reproduced. Thus, the continued reproductive success of the entire stock depends on the reproductive success of a single cohort, leaving the stock in a critical situation that may seriously jeopardize recruitment.

If the WCPFC fails to adopt sufficient management measures, the stock will be subject to potential collapse. Should the WCPFC fail to adopt sufficient management measures that are consistent with scientific advice, the fishery could ultimately be subject to more draconian management measures such as extended closed seasons and areas until such time that managers can prepare a rigorous and scientifically defensible recovery plan.

The NC, consistent with the best available scientific information, must recommend that fishing mortality on North Pacific bluefin tuna be urgently reduced, especially on juveniles, in order to reduce the risk of recruitment collapse and allow spawning stock to rebuild. If sufficient management measures are not adopted, the NC should consider that fishing should not be allowed to continue on such a depleted stock.

WWF recommends that the NC:

- Recommend adoption of a long-term Pacific bluefin recovery plan, candidate limit and target reference points, and harvest control rules that are well-defined, pre-agreed and contain mandatory actions for a determined course of management action in response to changes in indicators of stock status with respect to reference points;

- Recommend juvenile Pacific bluefin tuna catch be reduced by at least 50% from 2002-04 average harvest levels;
- Develop a catch limit for adult Pacific bluefin tuna no greater than the 2002-2004 average harvest level;
- Develop a catch documentation scheme for Pacific bluefin to ensure monitoring and control of the Pacific bluefin catch through traceability; and
- Recommend a moratorium on fishing for North Pacific bluefin tuna in the event that scientifically defensible management measures are not clearly and firmly implemented.

North Pacific Albacore

Taking note that ISC indicates that the stock is not being overfished nor is it in an overfished state, but also acknowledging the very important economic value of the North Pacific albacore fishery:

WWF recommends that the NC:

- Encourage the WCPFC to adopt appropriate LRP, TRP, and HCRs for the North Pacific albacore stock;
- Recommend that the total level of fishing mortality for North Pacific albacore tuna in the Northern Pacific Ocean not be increased beyond current levels; and
- Recommend that all CCMs shall take necessary measures to ensure that the level of fishing mortality exerted by their vessels fishing for North Pacific albacore is not increased.

North Pacific Blue Shark

Taking note that SC indicates the North Pacific blue shark stock is likely not experiencing overfishing and likely not to be in an overfished condition, but also noting there is significant uncertainty associated with the level of current fishing mortality for blue shark and the ongoing sustainability of this stock:

WWF recommends that the NC:

- Recommend all targeted shark fisheries be required to submit management plans with robust catch limits for those shark species to the Commission by WCPFC12;
- Encourage the WCPFC to adopt appropriate LRPs and TRPs for the North Pacific blue shark stock;
- Encourage and endorse additional research and analysis of the WCPO blue shark stock as well as some precautionary mitigation measures including to:
 - Mandate bycatch best practices consistent with those found in the Compendium of Best Practice of Conservation and Management Measures (CMMs) for the of Species Bycatch in Tuna RFMOs;⁶ and

- Require, through data collected from observer programs and other means, estimation of the number of captures and releases of blue sharks, including the status upon release (dead or alive), and reporting of this information to the WCPFC; and
- Restrict fishing mortality of blue sharks to precautionary levels so as to have a high confidence those levels maintain the stock at a sustainable level.

Regional Observer Program

Information collected as part of an appropriate observer programme is critically important to the proper management of a fishery. Data collected by observers plays a central role in informing fisheries scientists on everything ranging from stock assessments to non-target species impacts. Furthermore, observers play an indispensable role in monitoring and enforcing very important conservation and management measures in the WCPO. Consequently, observer coverage must be considered a top priority and greater support must be provided to the relevant authority to see that the capacity of the Regional Observer Programme (ROP) is strengthened.

The WCPFC must ensure, through appropriate guidance, that national observer programmes administered under the ROP are fully resourced in terms of human and financial capital as well as governed under appropriate administrative and management structures. Within that consideration, the NC should promote and support analysis that considers and presents not only a cost-benefit analysis of the observer programme in the context of proper management, but also different funding models that CCMs could consider for ensuring proper administration and management of the observer program at a national level. In any event, more attention must be given to the development and full funding of minimum standards that ensure a national programme can perform to ROP standards, including such efforts as annual reviews of the national programs under pre-agreed performance standards.

WWF continues to maintain significant concerns regarding the independence of onboard observers from the perspective of data integrity. The independence and the security of the observer must be paramount to ensure data integrity. Therefore, WWF recommends that any observer funding model considered must avoid even the perception of conflict of interest. This means establishing a 3rd party payment system that insulates the observer from direct payment by the vessel owner or operator, which constitutes an unequivocal financial conflict of interest. WWF suggests that the NC support efforts to carefully research funding models that ensure that observer providers can provide timely and secure payments to observers without having those payments made directly to the observer by the vessel owner or operator as well as measures to ensure the independence of observers as part of the proposed funding model analysis.

WWF generally supports current efforts throughout the WCPO in pursuit of Electronic Monitoring (EM). Other fisheries around the world have demonstrated varying levels of success using EM in limited circumstances, depending on the goal of the observation and data collection program. Therefore, each application of EM is contextual and must be subject to thorough analysis, comprehensive testing, and careful monitoring to ensure the technology and program is functioning as designed. WWF would like to acknowledge the important role that EM could potentially play in ensuring observer coverage throughout the WCPFC CA, possibly even at a reduced cost, but noting that there will always be a need for human observers to perform certain analytical tasks that a camera, sensor, or computer

simply cannot accomplish. WWF recommends that the NC support development of a peer review process for the various EM programs in progress or currently planned for implementation in the WCPO.

With respect to the ROP, the NC should recommend:

- Further implementation of a binding, consistent, and consolidated set of standards for the ROP;
- Developing a cost-benefit analysis of the observer programme in the context of proper management, including an analysis of different funding models;
- Reconstituting the Data Consultative Committee (DCC) to address current data issues in the ROP, including consideration of:
 - Revisions of data fields for non-target species to include detailed entries for seabirds, turtles, and sharks, broken out by species, in all observer reporting submissions; and
 - Developing and implementing a more comprehensive analysis and design plan for spatially and temporally representative observer coverage of each fishery operating in the WCPFC CA., including thorough consideration and assessment of EM as a component of full observer coverage.

¹ United Nations Fish Stocks Agreement, 34 ILM 1542 (1995); 2167 UNTS 88. (The fishing mortality rate which generates maximum sustainable yield should be regarded as a minimum standard for limit reference points. (Annex II UNFSA 1995)).

² Norris, W. (2009). The Application of Reference Point Management in WCPO Tuna Fisheries: An Introduction to Theory and Concepts. WCPFC-NC5-2005/ME-WP-01. (Biomass (B) represents the weight of all fish in the water.)

³ *Id.* (Spawning biomass (SB or SSB) is the weight of all mature [reproductive and generally female] fish in the water, or [preferably] the reproductive potential of the population. Gives a better indication than B of the reproductive capacity of the stock, and tends to be more stable.)

⁴ *Id.* (Fishing Mortality (F) relates to the proportional impact of fishing on the total deaths in a stock during a given period.)

⁵ United Nations Fish Stocks Agreement, 34 ILM 1542 (1995); 2167 UNTS 88. (Fishery management strategies shall ensure that the risk of exceeding limit reference points is very low. If a stock falls below a limit reference point or is at risk of falling below such a reference point, conservation and management action should be initiated to facilitate stock recovery. Fishery management strategies shall ensure that target reference points are not exceeded on average. (Annex II UNFSA 1995)).

⁶ WWF. A Compendium of Conservation and Management Measures to Address the Impacts of Species Bycatch in Tuna RFMOs. (2011). Retrieved from http://www.hsi.org/assets/pdfs/joint_fisheries_bycatch_2011.pdf.

Our Smart Fishing Vision and Goals:

Vision: The world's oceans are healthy, well-managed and full of life, providing valuable resources for the welfare of humanity.

2020 Goals: The responsible management and trade of four key fishery populations results in recovering and resilient marine eco-systems, improved livelihoods for coastal communities and strengthened food security for the Planet.



Why we are here

To stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature.

panda.org

For more information

Alfred "Bubba" Cook
WCP Tuna Programme Manager
acook@wwf.panda.org
Tel: +6799035008

WWF Smart Fishing Initiative
Moенckebergstr. 27
20095 Hamburg

Tel. +49 40 530 200 310

www.panda.org/smartfishing

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