

20 June 2016

Forum Fisheries Committee, Sub-Committee on South Pacific Tuna and Billfish Fisheries
c/o Pacific Islands Forum Fisheries Agency
1 Koloale Road
Honiara, Solomon Islands

Parties to the Nauru Agreement
c/o Ludwig Kumoru, CEO
PNA Office PO Box 3992
Majuro, Marshall Islands

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: WCPO Tuna MSC Alignment Group 2016 Position

As participants and stakeholders of the Western and Central Pacific Ocean (WCPO) Tuna Marine Stewardship Council (MSC) Alignment Group, we the undersigned seafood companies, catch sector associations and environmental non-governmental organizations are committed to the long-term ecological and socioeconomic sustainability of tuna fisheries of the western and central Pacific Ocean. The aim of the Alignment Group is for all WCPO tuna fisheries to be able to pass an assessment against the MSC fisheries standard, and for fisheries certified against the MSC fisheries standard to meet all conditions of certification. The achievement of this standard is increasingly needed to be competitive in the market.

Meeting the MSC fisheries standard requires that fundamental elements of modern fisheries management required by UNCLOS, the UN Fish Stocks Agreement and the Convention that established the Western and Central Pacific Fisheries Commission (WCPFC) are adopted by sub-regional (SC-SPTBF, PNA) and regional (WCPFC) management systems. Doing so would support the long-term ecological 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, would also contribute to achieving objectives for the long-term socioeconomic sustainability of the regions tuna fisheries.

In October 2015, the Alignment Group issued a long-term position statement to WCPFC Members, Cooperating Non-members and Participating Territories (CCMs) (<http://tinyurl.com/ALignGroupLongtermPosition>). To address regional-level deficits when assessed against the MSC fishery standard, we identified the following priority actions that parties to the SC-SPTBF, PNA and WCPFC could address during 2016 decision-making processes:

- **Transition to harvest strategies:** To begin the transition from the status quo of management systems reacting when stocks of principal market species fall below limit reference points (LRPs) to developing and implementing comprehensive, integrated harvest strategies, including harvest control rules (HCRs) with pre-agreed actions that aim to stay near target reference points (TRPs) and to not exceed LRPs that are to be taken if reference points are exceeded:
 - (1) Adopt TRPs for south Pacific albacore and WCPO bigeye and yellowfin tunas. A core element of a robust harvest strategy, a TRP is designed to enable a stock to meet ecological and/or socioeconomic management objectives.

- (2) Amend conservation and management measures (CMMs) for south Pacific albacore and WCPO bigeye and yellowfin tunas to adopt HCRs, defined by MSC as, “A set of well-defined pre-agreed rules or actions used for determining a management action in response to changes in indicators of stock status with respect to reference points.” The HCRs should be designed to keep stocks near the proposed new TRPs and to not exceed existing LRPs. HCR actions are to be designed to reduce fishing mortality rates when reference points are approached, and increase fishing mortality rates as stocks trend above TRPs. Because WCPFC CMMs will have negotiated and agreed to the HCR actions in advance, this will enable efficient management responses to changes in stock status. Monitoring strategies may also require amendment to account for the new TRPs and HCRs.
- **Improve CMMs:**
 - (3) Simplify the south Pacific albacore and tropical tuna CMMs by eliminating all exemptions and options, in order to increase compliance and enforceability.
 - (4) The CMM for WCPO bigeye tuna has, to date, not met scientific recommendations for reductions in fishing mortality to achieve rebuilding. Address this by either making substantial improvements to existing measures, or establishing new measures in addition to or in place of existing measures that result in reductions in fishing mortality, in part, to effectively account for increases in purse seine fishing efficiency and to improve compliance.
 - (5) Adopt a replacement WCPFC seabird CMM that moves the Southern Hemisphere boundary sufficiently toward the equator in order to provide adequate protection to migratory seabirds categorized as Threatened on the IUCN Red List, and harmonizes bycatch mitigation options for Northern Hemisphere longline vessels with recommendations on best practices made by the Agreement on the Conservation of Albatrosses and Petrels.
 - **FAD management:** We note and commend the Parties to the Nauru Agreement (PNA) for initiating in 2016 a trial of a program to register and track all fish aggregating devices (FADs) used in purse seine fisheries conducted in PNA waters. Binding measures are needed to monitor and control anchored and drifting FADs.
 - (6) Require only non-entangling FAD designs, now required in all other regions.
 - (7) Require owners of purse seine and support vessels to report to management authorities data on all FAD deployments, designs, equipment, and real-time positions, with an appropriate time lag to protect confidentiality.
 - (8) Require unique identification markings on all FADs to identify ownership.
 - (9) Request the development of scientific advice to determine area-based limits on the density of drifting FADs that meet TRPs for each tropical tuna stock, identified as a priority by the PNA office (WCPFC-2015-FADMgmtWG-RefPaper-10B).
 - **Transshipment:**
 - (10) To reduce the risk of fish from illegal, unreported and unregulated (IUU) fisheries entering supply chains, require 100% observer coverage for at-sea transshipment by all types of fishing vessels. Vessels that cannot meet this condition should not be allowed to transship at sea.
 - **Longline compliance with minimum observer coverage rate:**
 - (11) To increase compliance with the existing requirement for a minimum 5% longline observer coverage rate, publically identify and sanction non-compliance.
 - **Shark and ray LRPs:** Limit reference points (LRPs), another core element of a robust harvest strategy, are boundaries designed to constrain fishing to within safe biological limits (e.g., a limit that prevents recruitment impairment).
 - (12) Adapt the hierarchical approach outlined in WCPFC SC7-MI-WP-03 to identify precautionary LRPs for silky and oceanic whitetip sharks, and populations of mobulid rays, which are at risk due, in part, to bycatch in WCPO purse seine and longline fisheries.

We note and support the adoption of WCPFC CMM 2014-06 at WCPFC11 that provides for the development and implementation of a harvest strategy approach for key stocks and fisheries, and its accompanying workplan. This is an important development, which will be vital to progress

agreement within the Commission. We urge parties to maintain this momentum by taking steps to implement the priority actions outlined in this letter this year.

We request that you kindly circulate this letter to SC-SPTBF members, PNA members and WCPFC CCMs and observers.

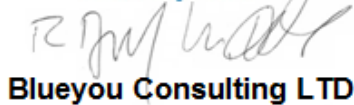
Yours sincerely,



Anova Foods USA



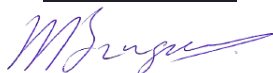
Asosiasi Perikanan Pole & Line dan Handline Indonesia



Blueyou Consulting LTD



Coral Sea Fishing Australia



Culimer B.V.



Fiji Tuna Boat Owners Association



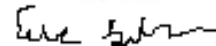
International Pole & Line Foundation



International Seafood Sustainability Foundation



Luen Thai
Fishing Venture Ltd.



Luen Thai Fishing Venture



Masyarakat dan Perikanan Indonesia



Meliomar



James Robinson

New England Seafood International



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Sustainable Fisheries Partnership



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Norpac Fisheries Export



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The Nature Conservancy



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Pacific Islands Tuna Industry Association



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Tuna Management Association of New Zealand



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Walker Seafoods Australia



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Sea Delight



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World Wildlife Fund

Established in May 2014, the **WCPO Tuna MSC Alignment Group** is comprised of client groups of fisheries certified and under assessment against the Marine Stewardship Council (MSC) fisheries standard and of participants of Fishery Improvement Projects (FIPs) for fisheries for albacore, bigeye and yellowfin tunas in the Convention Area of the Western and Central Pacific Fisheries Commission (WCPFC), and other stakeholders. The Alignment Group aims to address deficits with sub-regional and regional management systems for fisheries for pelagic tunas to a point where these fisheries can pass an assessment against the Marine Stewardship Council (MSC) fisheries standard and meet conditions of certification. The Alignment Group coordinates activities of contributing MSC client groups and FIP participants to pursue improvements in sub-regional and regional management systems. For more information, see <http://tinyurl.com/TunaAlignGroup>.
