

13 February 2017

WCPFC Members, Cooperating Non-members, Participating Territories and Observers
c/o Feleti P. Teo, OBE, Executive Director
Western and Central Pacific Fisheries Commission
Kolonia, Pohnpei State
Federated States of Micronesia

Re: WCPO Tuna MSC Alignment Group 2017 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 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 any 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 implemented. 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.

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. We are cautiously optimistic that the lack of progress at WCPFC13 in implementing the harvest strategy workplan activities scheduled during 2016 can be corrected at WCPFC14, as outlined in this letter.

To address regional-level deficits when assessed against the MSC fishery standard, we identified the following priority actions that parties to WCPFC could address in 2017:

1. Adopt and Implement Robust Harvest Strategies

Implement 2017 planned actions of the WCPFC Provisional *Updated Workplan on Harvest Strategies 2016-2019 and Record of Outcomes from WCPFC13* (WCPFC13 draft Summary Report Attachment N), paraphrased as follows:

Stock	2017 Action
South Pacific Albacore	Agree target reference point <ul style="list-style-type: none">• Commission agree a target reference point Develop harvest control rules and management strategy evaluation <ul style="list-style-type: none">• SC provide advice on candidate harvest control rules based on agreed reference points• Commission consider advice on progress towards harvest control rules
WCPO Skipjack	Develop harvest control rules and management strategy evaluation <ul style="list-style-type: none">• SC provide advice on candidate harvest control rules based on agreed reference points• Commission consider advice on progress towards harvest control rules
WCPO Bigeye	Agree performance indicators and monitoring strategy <ul style="list-style-type: none">• SC provide advice on a range of performance indicators to evaluate performance of harvest control rules

	<ul style="list-style-type: none"> • Commission agree interim performance indicators to evaluate harvest control rules • SC report on status following updated assessment • SC and SPC provide advice to the Commission on the likely outcomes of revised tropical tuna measure
WCPO Yellowfin	<p>Agree performance indicators and monitoring strategy</p> <ul style="list-style-type: none"> • SC provide advice on a range of performance indicators to evaluate performance of harvest control rules • Commission agree interim performance indicators to evaluate harvest control rules

We note with disappointment that the commission was unable to implement several actions scheduled for accomplishment at WCPFC13 under the original 2014 WCPFC harvest strategy workplan (suppl_CMM 2014-05, *Agreed Workplan for the Adoption of Harvest Strategies under CMM 2014-06*), and strongly encourage WCPFC to effectively implement the revised schedule this calendar year. In addition, we encourage WCPFC to adopt a revised harvest strategy workplan that extends the schedule and scope to include as an end point the adoption of harvest control rules (HCRs) and tools for each of the four covered stocks. A HCR, with associated management actions, together act effectively to reduce exploitation rates as limit reference points are approached and to stay near target reference points. The HCR should take into account the main uncertainties regarding the status of the stocks and fishery impacts, and other important uncertainties. Finally, we recommend that WCPFC explicitly define each step of the process that the commission intends to implement to put in place each of the six harvest strategy elements defined in CMM 2014-06 and in the provisional updated harvest strategy workplan, as well as steps of annual recurring processes to implement some of the harvest strategy elements.

Improve CMMs

2. To increase compliance, enforceability and efficacy, simplify the south Pacific albacore CMM and make measures applicable throughout the range of the stock within the convention area.
3. The tropical tunas CMM has, to date, not resulted in meeting scientific recommendations for reductions in bigeye tuna fishing mortality to end overfishing and rebuild the stock. Address this by either improving existing measures, or establishing new measures in addition to or in place of existing measures that result in reductions in fishing mortality in line with scientific advice, in part, by improving compliance and effectively accounting for increases in purse seine fishing capacity and efficiency.
4. Replace WCPFC seabird CMM 2015-03 to move 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 to eliminate a mainline line shooter and management of offal discharge as options for bycatch mitigation methods, as these two methods are relatively ineffective at reducing seabird catch rates.

5. FAD management

Binding measures are needed to monitor and control anchored and drifting FADs.

- (a) Require only non-entangling FAD designs, now required by all the other tropical tuna RFMOs.
- (b) 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, and require domestic management authorities to report these data to the Scientific Committee with appropriate time lags and other methods to protect confidentiality.
- (c) Require unique identification markings for all FADs to identify ownership.
- (d) Adopt definitions of when a FAD is lost, discarded or abandoned.
- (e) Require purse seine vessels owners to report to management authorities all lost (including stolen), abandoned or otherwise discarded FADs, with no-fault measures for reporting.
- (f) Request the development of scientific advice to determine area-based limits on the density of FADs that meet TRPs for each tropical tuna stock, identified as a priority by the PNA office (WCPFC-2015-FADMgmtWG-RefPaper-10B).

6. Transshipment

To reduce the risk of fish from illegal, unreported and unregulated (IUU) fisheries entering supply chains, require 100% observer coverage (human or electronic) of all at-sea transshipment. Prohibit at-sea transshipment by vessels that cannot meet this condition.

7. Minimum observer coverage

- (a) To increase compliance with the existing requirement for a minimum 5% longline observer coverage rate, identify and sanction non-compliance.
- (b) Request SC/SPC to provide advice on what minimum onboard observer coverage rate is adequate for each regional fishery to provide required information to meet scientific objectives of analysis.

8. Shark and ray LRPs

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 fishing mortality in WCPO purse seine and longline fisheries.

We urge parties to take steps to implement the priority actions outlined in this letter this year. We request that you kindly circulate this letter to WCPFC CCMs and observers.

Yours sincerely,



H Factor

Anova Food, LLC



Resuman

Asosiasi Perikanan Pole & Line dan Handline Indonesia



R. Paul
Blueyou Consulting LTD



[Signature]
Fiji Tuna Boat Owners Association

Anare Ratuwaku

Fiji Fishing Industry Association



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International Pole & Line Foundation



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International Seafood Sustainability Foundation



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Luen Thai Fishing Venture



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Masyarakat dan Perikanan Indonesia



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Meliomar



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 targeting pelagic 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 MSC fisheries standard and meet conditions of certification. The Alignment Group facilitates the coordination of activities of participating MSC client groups and FIP participants to pursue improvements in sub-regional and regional management systems. For more information, see <http://tinyurl.com/TunaAlignGroup>.
