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Mr. Donald Hansen, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR 97220-1384

April 3, 2006

Dear Chairman Hansen and Members of the Pacific Fishery Management Council:

The Hawaii Longline Association offers the following comments on the Analysis of Management Options for Development of a Plan to End Overfishing of Pacific Bigeye Tuna in the Eastern Pacific Ocean (BET Analysis).

The Hawaii Longline Association (HLA) was formed in the year 2000 to advance the common interest of individuals and entities involved in the Hawaii-based commercial longline fishery, and to promote participation and input by industry in fishery conservation and management. HLA recognizes that uncontrolled fishing could threaten the fish stocks on which we depend and, accordingly, supports the goals of fishery management. HLA has supported the regional fishery management council process over the years because the process is open and inclusive, and Councils' decisions and recommendations are generally based on sound science. We anticipate that this constructive process will continue, and as long as it does, we commend you and will support you.

HLA has a direct interest in the conservation of Pacific bigeye tuna throughout the Pacific as its members comprise the principal U.S. fleet targeting bigeye. Through the limited entry program that has been in effect in the Hawaii longline fishery since 1994, the United States has responsibly managed the growth potential of our fishery in order to ensure overfishing in our fishery does not occur. Under this program, the number of vessels that may participate in the fishery, as well as vessel length, are capped. As a result, the U.S. longline fleet in the Eastern Pacific Ocean (EPO) has remained small, and

its proportion of the bigeye catch in the EPO remains less than one percent. Current concerns regarding overfishing of bigeye in the Pacific are attributable to the growth of foreign longline fisheries that have not been subject to limited entry requirements, and to the incidental catch of juvenile bigeye by purse seine vessels.

As indicated in the BET Analysis, U.S. longline fishermen, most of which operate out of Hawaii, are now limited to a very small quota of bigeye in the EPO, a result of action by the Inter-American Tropical Tuna Commission (IATTC) to limit fisheries in 2004-2006. This quota is based on 2001 catch levels for IATTC members, and was intended to reduce harvests by nations that had greatly expanded their fishing after that year. However, the U.S. longline fleet had already responsibly managed its growth potential through the limited entry program, and had experienced an unusually poor fishery in the EPO in 2001 compared to earlier and later years. Many factors contributed to this situation, including litigation and fishery closures that affected overall fishing effort, and the catch of unusually small fish, such that the tonnage of catch was disproportionately low relative to actual numbers of fish caught. The low quota imposed under the IATTC has, in turn, disproportionately affected the U.S. fishery because of both the stability of the U.S. fleet's size and effort under our limited entry program, and the anomalously low catch experienced in the year used by the IATTC to set its quotas.

HLA recognizes that the Magnuson-Stevens Fishery Conservation and Management Act (MSA) imposes an obligation on your Council, and the Western Pacific Regional Fishery Management Council (WPRFMC), to support measures to address overfishing in the fisheries under each council's jurisdiction and management. As you know, however, and as is pointed out in the BET Analysis, unilateral action by the United States will have negligible effect on the Pacific bigeye tuna stock. Effective measures to end overfishing of bigeye in the Pacific can only occur at the international level. Because the domestic longline fishery is not overfishing bigeye in the EPO, we believe the Council should develop recommendations for responsible international action. After international action is taken, the Council should then consider domestic controls appropriate to and consistent with your FMP for Highly Migratory Species, the MSA and U.S. treaty obligations.

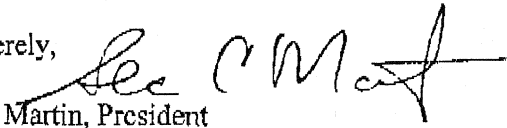
HLA notes that the Analysis (unlike the draft the Council was presented with in March) now contains a new Option 6 that consists of some of the recommendations from the WPRFMC's draft FMP Amendment 14 to address overfishing of bigeye and yellowfin tuna. HLA believes that the WPRFMC's recommendations are both comprehensive (they address all management and research needs including monitoring and enforcement) and well directed with their emphasis on the need for international action and strong recommendations for effective conservation measures. HLA agrees especially that there should be focus on the fishery sectors that have the greatest impact on bigeye tuna. Small fleets that catch one percent or less of the total catch should be exempted, or at least less drastically limited than those that catch large portions of the total catch. We also believe that important consideration should be given to the existing management measures that limit the size and effect of the domestic fishery on tuna and other fish stocks. If these measures are ignored, the efforts of the U.S. to responsibly manage its fisheries will work to the detriment of domestic fisheries and to the disproportionate benefit of those fisheries that have experienced significant unregulated growth.

HLA therefore recommends that the Pacific Council (i) modify Option 6 so that it is fully consistent with WPRFMC's Amendment 14, and (ii) support and forward to U.S. Commissioners to IATTC and to the Department of State the modified Option 6 as its preferred approach for addressing bigeye overfishing in the EPO. This will provide a

consistent approach by both regional fishery management councils, which is much more likely to generate support in the U.S. delegation than if the two councils approached the issue differently.

Thank you for this opportunity to comment on this issue. HLA looks forward to working with the Council and its scientists and advisors in the future.

Sincerely,


Sean Martin, President

cc: Kitty Simonds, WPRFMC
Don Hansen
Mark Helvey
Rod McInnis
Bill Robinson