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Phil Anderson, Chair
Pacific Fishery Management Council
1100 NE Ambassador Place, #101
Portland, Oregon 97220

Re: Agenda Item J.1 – National Marine Fisheries Service Report

Dear Chair Anderson and members of the Council:

On August 17, 2017, NOAA Fisheries announced that preliminary estimates indicated that U.S. commercial vessels had caught approximately 400 metric tons of Pacific bluefin tuna and that NOAA Fisheries was preparing to implement a trip limit of 2 metric tons to prevent an overage of the annual catch limit of 425 metric tons established by IATTC Resolution C-16-08. However, on August 23, NOAA Fisheries provided advanced notice that the commercial fishery would need to be closed after it was determined that U.S commercial vessels had exceeded the established limit¹. After accounting for the total 2017 catch and subtracting the overage amount from next year's limit, U.S. fishermen will be faced with a severely reduced quota, which may limit their 2018 annual catch to no more than 125 metric tons.

We remain concerned that the current domestic management and monitoring strategy for the U.S. commercial vessels does not ensure compliance with international regulations and obligations. Delays in reporting and the delay in the fishery closure allowed vessels to continue to target and catch Pacific bluefin tuna after the limit was reached - increasing the size and impact of the overage. While we appreciate NOAA Fisheries' ultimate actions to close the fishery, it is important to consider how management measures can be improved and implemented in a timelier manner to prevent overages in the future. With the population still at just 2.6% of its historical high size, it is important to have a responsive management approach. We ask the Council to adopt the following recommendations to help improve this process in the future:

- Decrease the trip limits for all U.S. commercial vessels that target Pacific bluefin tuna;
- If possible, modifications to existing regulations to allow for immediate closure of the U.S. commercial fishery if an overage is predicted;

¹ Federal Register Volume 82, Number 165, 40720

- A requirement that logbook entries or landing receipts for all U.S. commercial vessels targeting Pacific bluefin be submitted directly to NOAA Fisheries within 24 hours of landing; and
- Support of the U.S. delegations to the WCPFC and IATTC for development of an electronic Catch Document Scheme (CDS) with the objective to increase the effectiveness and timeliness of catch reporting and tracking.

Thank you for your consideration of these comments and recommendations.

Sincerely,



Amanda Nickson
Director, Global Tuna Conservation



Paul Shively
Project Director, U.S. Oceans, Pacific