



Pacific Fishery Management Council

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Dan Wolford, Chairman | Donald O. McIsaac, Executive Director

March 26, 2012

Mr. David A. Balton
Deputy Assistant Secretary for Oceans and Fisheries
Bureau of Oceans and International Environmental and Scientific Affairs
U.S. Department of State
2201 C St. NW, Ste 3880
Washington, D.C. 20520

Dear Mr. Balton:

On April 7, 2011, National Marine Fisheries Service sent a letter of notification to the Pacific Fishery Management Council (Pacific Council) that it had determined overfishing is occurring on Pacific bluefin tuna (*Thunnus orientalis*) pursuant to Section 304(i) of the Magnuson-Stevens Fishery Conservation and Management Act (MSA). Section 304(i) applies to stocks where overfishing is the result of excessive international fishing pressure. It requires the Pacific Council, within 1 year of the notification, to

- develop recommendations for domestic regulations to address the relative impact of fishing vessels of the United States on the stock, and
- develop and submit recommendations to the Secretary of State, and to the Congress, for international actions that will end overfishing in the fishery and rebuild the affected stock, taking into account the relative impact of vessels of other nations and vessels of the United States.

The notification letter asks the Pacific Council to work closely with the Western Pacific Fishery Management Council (Western Pacific Council) in developing measures and recommendations. A June 27, 2011, letter from the Western Pacific Council Executive Director contains a recommendation from the Western Pacific Council calling on the Pacific Council to address the stock's overfishing status, given the larger domestic catches of Pacific bluefin in the Pacific Council area. This letter represents a joint response from the Pacific Council and Western Pacific Council on recommendations to address Pacific bluefin tuna overfishing.

The attached report provides background information on the status of the Pacific bluefin tuna stock, domestic landings on the west coast and Hawaii, international and domestic management measures, and joint recommendations from the Pacific and Western Pacific Fishery Management Councils. These recommendations are:

Domestic Management Measures

The Councils do not recommend new domestic management measures to address the relative impact of U.S. fishing vessels on the Pacific bluefin stock. Current regulations for fisheries off west coast states and in the western Pacific adequately address the very low impact of U.S. fisheries on the stock of Pacific bluefin tuna.

Based on the most recent catch tables of the International Scientific Committee for Tuna and Tuna-like Species in the North Pacific Ocean (ISC), Japan, Mexico, Chinese Taipei, and Korea have caught an average of 99 percent of the northern bluefin tuna landings in the Pacific Ocean from 2005-2009. For the past five years (i.e., 2005-2009), U.S. domestic fisheries have accounted for a very small portion (less than 1 percent on average) of the total Pacific northern bluefin tuna catch. For example, since 1990 the U.S. Pacific bluefin fishery has been opportunistic, and landings have varied from a low of 60 tons (2004) to a high of 4,749 tons (1996). For the last decade, the U.S. has not been a factor in overfishing the North Pacific bluefin stock.

Thus, the Pacific Council recommends that overfishing be addressed at the international level rather than through unilateral domestic measures that are unlikely to result in any significant conservation benefits to Pacific bluefin tuna. Any proposed measures should consider the annual variability in U.S. catch and effort of bluefin in the eastern Pacific Ocean, to enable the U.S. fleet to target bluefin in years when they are available off the U.S. West Coast.

Recommendations for International Actions that will End Overfishing in the Fishery and Rebuild the Affected Stock

The Councils strongly support the immediate adoption of Pacific bluefin tuna conservation and management measures in the Western and Central Pacific Fisheries Commission (WCPFC) and the Inter-American Tropical Tuna Commission (IATTC). The reduction of the fishing mortality of juvenile age classes is a key step to ending overfishing. Catches of juvenile age classes appear higher in the western Pacific. International measures should reflect the relative impact of fisheries on the stock by age.

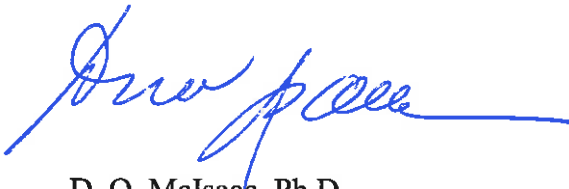
Currently, the WCPFC has a Pacific bluefin tuna conservation and management measure in place (i.e., Conservation and Management Measure [CMM] 2010-04) to limit fishing effort in 2011-2012 to the 2002-2004 levels and to limit the catch of juveniles (age 0-3) to below the 2002-2004 levels. The measure currently includes an exemption for artisanal fisheries and Korea. As this measure expires at the end of 2012, the Councils strongly support adoption of a replacement measure at the 2012 WCPFC meeting, including removing the exemptions for artisanal fisheries and Korea if they are not well-justified. The Councils may provide more detailed recommendations to U.S. delegations to Pacific Regional Fishery Management Organizations on potential management measures after the next bluefin stock assessment is complete and WCPFC proposed management measures are available to review. The ISC is scheduled to conduct the stock assessment in May 2012, and the ISC plenary will review the stock assessment and provide conservation advice in July 2012.

The Councils also support adoption of IATTC conservation and management measures to reduce fishing mortality on juvenile age classes of Pacific bluefin tuna in the eastern Pacific Ocean. The

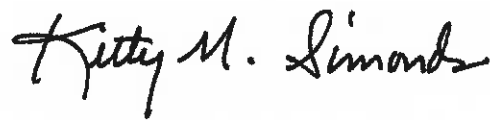
expected to provide detailed recommendations on potential management measures after the next bluefin stock assessment is complete, currently scheduled for later in 2012.

Lastly, please note that a major portion of the Southern California commercial passenger fishing vessel recreational fishery traditionally operates off the Mexican coast, and the U.S. recreational fleet needs to maintain that fishing opportunity to sustain their operations. Therefore, it is important to continue to foster the cooperative relationship that has developed between the two countries in the management of tuna stocks targeted by recreational fisheries in the Southern California Bight and off Baja California, Mexico. When considering proposals at the IATTC and other international forums, their effect on current, positive bilateral relations relative to recreational fisheries should be taken into account.

Sincerely,



D. O. McIsaac, Ph.D.
Executive Director, Pacific Council



Kitty M. Simonds
Executive Director, Western Pacific Council

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Attachment: Pacific Bluefin Tuna Overfishing Report

cc. The Honorable Doc Hastings, House of Representatives
The Honorable Edward Markey, House of Representatives
The Honorable Jay Rockefeller, United States Senate
The Honorable Kay Hutchison, United States Senate
Mr. David Hogan, Deputy Director, OMC, DOS
Mr. Russell Smith, Deputy Assistant Secretary for International Fisheries, NOAA
Ms. Rebecca Lent, Director of Office of Internal Affairs, NOAA
Mr. Sam Rauch, Deputy Assistant Administrator for Regulatory Programs, NOAA
Mr. Rod McInnis, Southwest Regional Administrator, NOAA
Pacific Council Members
HMSMT Members
HMSAS Members
Mr. Peter Flournoy, Chair IATTC GAC and WCPFC PAC
Mr. Svein Fougner, Vice Chair PAC
Dr. Kit Dahl