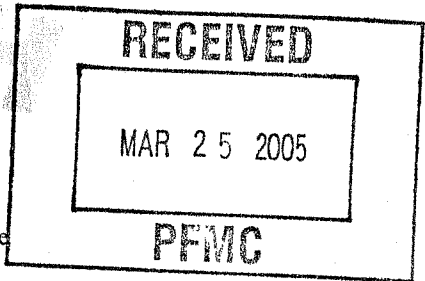


# *Federation of Independent Seafood Harvesters*

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March 23, 2005

Don Hansen, Chairman  
Pacific Regional Fishery Management Council  
7700 NE Ambassador Place, Suite 200  
Portland, OR 97220-1384

Dear Don,

The Federation of Independent Seafood Harvesters (FISH) is a non-profit association of West Coast HMS fishermen utilizing harpoon, drift gillnet, and/or longline gears. FISH is a long-time participant in domestic and international HMS fishery management forums, and advocates for sound, science-based fishery management policy and practice.

Regarding international HMS management, in response to studies showing that stocks of bigeye tuna in the eastern Pacific Ocean (EPO) were below a level that would produce average maximum sustainable yield, the Inter-American Tropical Tuna Commission (IATTC) passed resolution C-04-09 at their June 2004 meeting calling for member countries with large-scale tuna longline vessels<sup>1</sup> in the EPO not to exceed 2001 catch levels of bigeye tuna for 2004, 2005, and 2006. Accordingly, under authority of the Pacific Tuna Convention Act, NMFS enacted a rule to close the U.S. longline fishery in the EPO in 2004 when bigeye catches reach the 2001 level of 150 metric tons.<sup>2</sup> It is noteworthy that U.S. longline fishing was largely prohibited in 2001 to reduce sea turtle takes while the longline fleet of Japan continued fishing (and taking sea turtles) and got a 34,076mt bigeye quota; Korea got 12,576mt; Taiwan got 7,953mt; and China got 2,369mt.

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<sup>1</sup> The May 2004 meeting of the IATTC Working Group on Stock Assessments notes that longline vessels longer than 24 meters (78.74 ft.) in length, with freezing capability have been recently referred to as large-scale tuna longline vessels. It is also noted that the topic of "optimal" longline capacity has not been formally approached.

<sup>2</sup> This rule failed to exempt longline vessels less than 78.74 ft. in length, as specified in the IATTC's resolution.

FISH believes that there are more effective and equitable methods to conserve bigeye tuna than quotas based on vessel size limits. Bigeye mortality is proportional to fishing effort which is not effectively addressed by vessel size limits. FISH also believes that bigeye catch reduction is more effectively and equitably addressed by working from a TAC target rather than any one-year's catch total. Finally, FISH believes that quotas for U.S. longline fishermen should be adjusted upward to reflect required reduction in longline effort to reduce sea turtle takes.<sup>3</sup>

The IATTC meets again in June 2005. We urge the Council to provide the NMFS, the U.S. State Department, and U.S. IATTC Commissioners with its views regarding these matters.

Regarding domestic HMS management, the NMFS notified the Council that overfishing on bigeye tuna is occurring, and that the Magnuson-Stevens Fishery Management Act (M-SFMA) requires a Council responsible for preparing fishery management plans for federal waters to take appropriate action to address this overfishing. FISH, representing harpoon, and drift net fishermen operating within federal waters, is not aware of any bigeye catch in either of these fisheries. Therefore, although FISH encourages the Council to participate in international efforts to address the status of bigeye stocks in the EPO, the Council's responsibility to address bigeye overfishing under the M-SFA is satisfied.<sup>4</sup>

Respectfully,



Chuck Janisse

cc: Rod McInnis, NMFS  
William Gibbons-Fly, U.S. State Dept.  
Kitty Simonds, WPRFMC

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<sup>3</sup> In recognition of the possible adverse effects of tuna fishing on the populations of sea turtles in the EPO, the IATTC passed resolution C-04-07 in June 2004 calling for a three-year program to mitigate the impact of tuna fishing on sea turtles.

<sup>4</sup> See March, 2005 press release from Western Pacific Regional Fishery Management Council regarding overfishing of bigeye tuna.