

PACIFIC FISHERY MANAGEMENT COUNCIL

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May 10, 2005

Mr. Rod McInnis, Regional Administrator
National Marine Fisheries Service Southwest Region
501 W. Ocean Blvd., Suite 4200
Long Beach, CA 90802-4213

Dear Mr. McInnis:

The Pacific Council Highly Migratory Species Advisory Subpanel (HMSAS) met recently to provide advice on ongoing issues of concern regarding implementation of the Council's recently adopted and approved Fishery Management Plan (FMP) for U.S. West Coast Fisheries for Highly Migratory Species (HMS). A component of the discussion at that meeting is relevant to the upcoming Inter-American Tropical Tuna Commission (IATTC) meeting, including the preparatory meeting of the General Advisory Committee (GAC) on May 12. We forward this letter at this time to facilitate consideration by the GAC and consideration by you and other U.S. delegation parties in advance of the IATTC meeting June 20-24 in Lanzarote, Spain. This letter describes relevant discussion points on bigeye tuna and albacore and asks that you assist the Pacific Council in better communicating our concerns and recommendations on these important international issues relating to fisheries targeting species managed under our FMP.

On December 15, 2004, you notified us that NMFS had determined overfishing is occurring on bigeye tuna and the requirement in the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) and National Standard Guidelines that the Pacific Council respond to end overfishing. At the international level, the U.S. as a member of the IATTC, approved IATTC Resolution C-04-09 calling upon the U.S. in 2004-2006 not to exceed the 2001 bigeye tuna catch level of its large-scale tuna longline vessels, which was 150 metric tons. On the one hand, because West Coast bigeye tuna landings represent a tiny fraction of stock-wide fishing mortality, the Council can do little to substantively end overfishing. On the other, the domestic application of the current quota—both in terms of its size and allocation among U.S. fisheries—could have serious implications for the existing West Coast longline fishery. The Pacific Council is scheduled to consider this issue before the public early in the week at the upcoming June 12-17 Council meeting in Foster City, California and will forward the results of this consideration as soon as possible thereafter.

Preliminary indications from the most recent stock assessment for albacore tuna, conducted by International Scientific Committee for Tuna and Tuna-like Species in the North Pacific (ISC), raises concerns about the level of fishing effort directed at this stock as well. Although albacore tuna are an important component of both commercial and recreational HMS fisheries on the West Coast, like bigeye tuna, our contribution to stock-wide fishing mortality is minor. Our Highly Migratory Species Advisory Subpanel (HMSAS) has had the opportunity to review a draft of a resolution the U.S. delegation will present to the IATTC at their June 20-24, 2005,

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meeting, which proposes a cap on fishing effort directed at North Pacific albacore tuna in the Eastern Pacific Ocean. Here too, the way in which any such effort-limiting measures are implemented domestically could have profound effects on West Coast HMS fisheries.

With regard to the draft resolution on albacore tuna, we fully support paragraph 7, which calls upon the members of the Western and Central Pacific Fisheries Commission to take parallel action to limit fishing effort. It is our understanding that a large proportion of the fishing effort on albacore tuna occurs in the Western and Central Pacific Ocean. We believe that measures to conserve albacore tuna stocks, and indeed all HMS stocks, must be borne equitably by the fisheries of different nations operating on those stocks. We also seek further clarification of the basis for the 15 percent albacore catch composition value described in paragraph 3 of the resolution.

Notwithstanding any mandated response to bigeye tuna overfishing, these events underscore the need for the Council to find ways to effectively communicate our concerns to multilateral organizations such as the IATTC about the HMS fisheries we manage in partnership with NMFS. As Mr. William Gibbons-Fly, Director of the State Department's Office of Marine Conservation, stated in a January 14, 2005, letter to you it is important to consider the views of the councils in developing "concerted and coordinated action by the United States Government working with other governments, in particular through the multilateral organizations established by international treaties to conserve and manage tuna and other highly migratory fish stocks in the Pacific Ocean." In this regard, we seek your support in taking a more active role in forums such as, but not limited to, the General Advisory Committee to the U.S. Section of the IATTC.

With the implementation of our HMS FMP, the Council is entering a new arena: managing fish stocks whose ranges are much larger than the West Coast exclusive economic zone, our traditional management area. As evidenced by the observations and recommendations in this letter, the Council would like to work with NMFS, the Western Pacific Fishery Management Council, and the State Department to develop appropriate mechanisms to voice our concerns and provide advice on multilateral management of fish stocks identified in our HMS FMP.

Sincerely,



Donald K. Hansen
Chair

CRD:rdd

c: Mr. Peter Flournoy
Mr. William Gibbons-Fly