

Statement of the Hawaii Longline Association to the Pacific Fishery Management Council, June 14, 2005

Mr. Chairman and Members of the Council:

Thank you for this opportunity to present inputs from the Hawaii Longline Association for your deliberations on management of West Coast fisheries for highly migratory species.

The Hawaii Longline Association was formed in the year 2000 to advance the common interest of individuals and entities involved in the offshore fishing industry in the Hawaii-Pacific region and to promote participation and input by industry in fishery conservation and management. The HLA supports the goals of fishery management; the HLA recognizes that uncontrolled fishing could threaten the fish stocks on which we depend. The HLA emphasizes, however, that this support is conditional on the use of sound science as the basis for management, and on decision-making that is open and participative, with ample opportunity for industry's information and views to be entered into the record and considered by the management entities. The HLA has supported the Regional Fishery Management Council process over the years as that process clearly is open and inclusive, and Councils' decisions and recommendations are generally based on sound science. We anticipate that that will continue, and as long as it does, we commend you and will support you.

The HLA has a direct interest in the management of the highly migratory species fisheries that your Council controls through your Fishery Management Plan for U.S. West-Coast Fisheries for Highly Migratory Species. Several of the stocks in your HMS FMP management unit extend well beyond the exclusive economic zone off the West Coast, and many of the U.S. vessels that pursue these stocks have histories of participation in fisheries in the geographic boundaries of both the Pacific and Western Pacific councils. The HLA, however, has not been involved in your deliberations in the past and has only limited comments at this time.

The first point I would make is that the interests of HLA members and of West Coast fishermen fishing for HMS are linked. This linkage has been brought home by NMFS' recent notice to your Council and the Western Pacific Council that overfishing is occurring on Pacific bigeye tuna. Both Councils now have to respond. The HLA understands that you have a copy of the material that the Western Pacific Council recently considered (Agenda Item E.4.a) to address this issue. We urge that you endorse this procedural approach with such modifications as may be appropriate to fit the operational structure of your Council. We believe that the Councils' positions will be strengthened by adoption of a common strategy that will meet Magnuson-Stevens Act requirements without disadvantaging U.S. fishermen relative to international fleets.

Another example of the linkage is seen in the actions that led to the current U.S. longline catch limit of 150 mt in the eastern Pacific, the area of jurisdiction of the Inter-American Tropical Tuna Commission. This was established under an IATTC resolution in 2003 specifying absolute bigeye longline catch limits in the eastern Pacific for some nations and calling for nations without specified catch limits to limit their fleets' catches of bigeye tuna to the levels reached in 2001. It was not unreasonable for the U.S. to agree that conservation measures for the fishery were needed; there was legitimate concern about the decline in the bigeye tuna stock. It also was felt that 2001 was a desirable cutoff date because it preceded the large build up of longline effort

and catch by distant water fishing fleets. However, the U.S. delegation was not aware of or ask about the extent of fishing by Hawaii based vessels in the area; this is sometimes quite substantial. The U.S. delegation did not know that 2001 was an unusually “low” year for U.S. longline catch in the area; in fact, according to longline logbook data from NMFS, the 150 mt bigeye longline catch limit is well below the catches in the eastern Pacific in the years immediately prior to and after 2001. The U.S. fleet is now being disproportionately restricted when you compare the U.S. catch limit and prior years’ catches to the comparable numbers for other nations’ fleets. On top of that, the conservation gain from this restriction of U.S. fishing is probably not detectable. The HLA is urging the U.S. to seek an accommodation in IATTC that recognizes the interest of the U.S. fleet in the bigeye fishery without opening the door to expansion of fisheries by other nations.

Further, while strongly endorsing control of bigeye fisheries to prevent further stock declines and allow the stock to rebuild to MSY levels, the HLA is recommending that the U.S. seek assurance that the controls adopted by the IATTC (and ultimately in the western and central Pacific fishery commission as well) be fully implemented for ALL parties and that strong actions be taken against any nations whose vessels are found not to be in compliance with agreed upon conservation actions. The HLA hopes that the Pacific Council would agree.

The process by which the bigeye catch limit was adopted also demonstrates the need for active involvement by all interested parties in the development of U.S. positions in the international arena. Perhaps if there had been broader industry involvement in advance of the IATTC decision, then industry would have been able to ask questions and provide data demonstrating that the selection of the 2001 catch as the base year was relatively unfair to the U.S. Then perhaps some other approach could have been adopted to avoid this disproportionate impact on U.S. fishing interests.

Finally, the HLA is concerned that the Magnuson-Stevens Act requirements for addressing overfishing situations or overfished stocks that are internationally fished could be construed to place U.S. fisheries at risk for unilateral fishery controls, whether or not international action is being undertaken to resolve the problem and whether or not there would be any conservation gains. The HLA has developed a proposed amendment to the Magnuson-Stevens Act that would clarify the requirements as they pertain to HMS stocks that are not under international management. We will gladly provide you with a copy of the proposed amendment for your consideration; the HLA hopes you would support it.

Thank you again for this opportunity to address the Pacific Council. The HLA looks forward to working with you and your scientists and advisors in the future.

Sincerely,

Sean Martin, President