



Pacific Fishery Management Council

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Donald K. Hansen, Chairman Donald O. McIsaac, Executive Director

April 18, 2008

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

Re: Recommendations for the U.S. Delegation to the Inter-American Tropical Tuna Commission

Dear Mr. *Rod* McInnis,

At their April 7–12, 2008, meeting the Council made three recommendations for the U.S. delegation to the Inter-American Tropical Tuna Commission (IATTC) to consider when developing positions to be taken at the IATTC's 78th meeting, June 23–27, 2008.

First, the Council is concerned that the IATTC has been unable to adopt a new resolution containing conservation measures for yellowfin and bigeye tunas to replace Resolution C-06-02, which expired at the end of 2007. The Council urges the U.S. delegation to advocate vigorously for conservation and management measures sufficient to end overfishing on these two stocks. However, the Council notes that U.S. west coast coastal purse seine vessels occasionally target yellowfin tuna on those infrequent occasions when they occur off of Southern California. Their catches represent a very small proportion of total catches in the Eastern Pacific Ocean, but are an important economic opportunity for this fleet. Noting that any effective conservation and management measures would likely require a seasonal closure for purse seine vessels, the Council asks that the U.S. delegation work with the IATTC to explore the implications of an exemption for smaller, Class I-V vessels (well volume less than 426 m³) for the success of conservation and management measures. While an exemption for U.S. vessels alone may not impede successfully ending overfishing, we recognize that any such exemption would likely be applicable to vessels in these size classes from all member nations, potentially increasing the number of exempted vessels too much. One approach would be to model an exemption after the formula in C-06-02 used to limit catches of bigeye tuna by longline vessels. An exemption would be based on historical catch by vessels in these size categories for each nation. If catches were below a certain level, then the nation's Class I-V vessels would be exempted from the closure up to some small catch limit. For example, the U.S. fleet averaged less than 500 mt catch of yellowfin tuna in 2001–05, so an exemption based on a value of that general magnitude, along with a requirement that the national fleet not exceed some amount of catch, could be a workable formula. This would depend on the number of other nations potentially qualifying for such an exemption, and the overall level of catch that could ensue. IATTC scientific staff should conduct such an evaluation.

Second, we recommend the U.S. delegation emphasize to IATTC our growing concern about the status of the striped marlin stock in the North Pacific. A stock assessment published by the International Scientific Committee for Tuna and Tuna-like Species in 2007, based on the assumption that striped marlin is a single stock in the North Pacific, concluded that the stock is substantially depleted from historic levels. The IATTC has not conducted a striped marlin stock assessment since 2003. The U.S. should encourage the IATTC to conduct a new stock assessment as a basis for considering whether conservation and management measures are necessary. Any such stock assessment should critically evaluate available information on stock structure in order to determine whether an Eastern Pacific Ocean stock should be managed separately or as part of a single North Pacific stock.

Third, the Council notes that the U.S. has complied with Resolution C-05-02 by defining historical levels of fishing effort by U.S. vessels on the North Pacific albacore stock and demonstrating that effort has not increased. However, it does not appear that other nations have complied with the resolution in a similarly transparent way. We recommend the U.S. delegation request the IATTC emphasize that member nations formally demonstrate compliance with the resolution. Furthermore, in bilateral discussions, we recommend the U.S. encourage member nations to openly communicate how they are complying with the requirements of the resolution.

Clearly, the Council shares your concern about the status of the highly migratory species stocks in the IATTC arena. Addressing potential unsustainable fishing effort on these stocks requires international success on the difficult task of achieving consensus on effective management measures. The Council asks you to convey the views expressed in this letter to the U.S. delegation and the IATTC. We also stand ready to assist as necessary in this important matter.

Sincerely,



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

CRD:kam

cc: Council Members
Mr. David Hogan
Mr. Peter Flournoy
Ms. Rebecca Lent
Mr. Bill Robinson
Ms. Kitty Simonds
Mr. Paul Dalzell