

AMERICAN ALBACORE FISHING ASSOCIATION

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March 29, 2009

VIA EMAIL TO: PFMC.COMMENTS@NOAA.GOV

Mr. Don Hansen, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

Re: Agenda Item D.4 -- North Pacific Albacore: International RFMO Matters

Dear Chairman Hansen and Members of the Council;

The American Albacore Fishing Association (AAFA) represents American commercial fishing vessels that participate in the West Coast troll & bait-boat albacore fishery.¹ AAFA has long supported responsible management actions to maintain sustainability and improve the fishery's future for fishermen, fishing families and the vital coastal communities that rely on them.

At the present time, IATTC and WCPFC resolutions call upon countries to ensure that the level of fishing effort does not increase.

Stock assessment and scientific reports suggest that reductions in albacore fishing mortality may be necessary in the future.

Increased fishing effort, undesirable "*effort-shift*" and IUU fishing fleets could compromise the ability of RFMOs to accomplish effective international management of pelagic stocks such as albacore.

AAFA commends the Council's efforts to define an "*effort band*" characterizing the U.S. fishery. This response to domestic management efforts and international resolutions marks an important step forward. Such an approach can help accommodate traditional annual variations in catch levels that are commonly experienced by the pole & troll fishery.

AAFA supports the Council's ongoing efforts to encourage greater compliance by other nations with the data reporting requirements of the international resolutions.

As a pelagic species, albacore are subject to fisheries of a number of countries. Unilateral efforts by the U.S. will have little effect on the management of the overall stock. An international and more unified approach is needed to achieve sustainability. Accordingly, while addressing albacore effort of U.S. fisheries, AAFA believes the Council should be actively urging other nations to advance programs for implementing appropriate management measures, both individually and collectively through the RFMOs.

¹ AAFA is founded upon the belief that, by promoting the environmental benefits of the troll and bait-boat fisheries and promoting the health benefits of tuna consumption, the economic viability of these traditional "pole & troll" fisheries can be sustained.

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AAFA calls upon the Council to encourage greater U.S. efforts to (1) advance discussions at the IATTC and WCPFC toward implementing measures to ensure the responsible management of albacore and, (2) realize greater compliance with existing albacore data reporting requirements.

AAFA is aware that albacore stock assessments are based in large part upon biological data and studies that were conducted in the 1950s and 1960s. The strength of these important stock assessments, including related Biological Reference Points (BRPs), depend upon the quality of these early studies.

AAFA shares the concerns of ISC fishery scientists that albacore vital rates (natural mortality, growth, and maturity) may have changed over time due to changing environmental conditions and other factors. Since those early studies, significant technological advances have improved laboratory methodologies that provide greater understanding of the importance of this basic but essential data.

The ISC Albacore Working Group (ISC-ALBWG) has generated a proposal for the biological sampling, laboratory work and statistical analysis needed to update key albacore biological data.

As stewards of the sea, AAFA fishermen appreciate that effective albacore management depends in part upon the quality of the science underlying the stock assessments. The proposal's forecasted costs are reasonable – estimated at approximately \$95,000 per year. The value of these proposed improvements is immeasurable and AAFA believes these studies should be conducted.

AAFA calls upon the Council to recommend that IATTC carry out the ISC Albacore Working Group (ISC-ALBWG) proposal for a sampling and study program to update the vital rates for North Pacific albacore.

With the support of U.S. albacore fishermen, AAFA's efforts, innovation and leadership have been instrumental in revitalizing interest in this fishery. The continued sustainability of this fishery and growing public recognition of its value combine to directly benefit the tradition of this time-honored fishery, its fishermen, their families, and the vital coastal communities that rely on them.

Thank you for your time and consideration.

Sincerely,

Chip Bissell
AAFA representative