



June 13, 2016

Mr. Russell F. Smith III
Deputy Assistant Secretary for International Fisheries
National Oceanic and Atmospheric Administration
1401 Constitution Ave NW
Washington, DC 20230

Dear Mr. Smith,

In advance of the Inter-American Tropical Tuna Commission's (Commission) 90th Meeting in La Jolla, California, we write to urge the United States to promote strong science-based conservation and management measures for Pacific bluefin tuna. We recognize the leadership and efforts of the National Oceanic and Atmospheric Administration (NOAA) and the U.S. Department of State to engage other Members of the Commission in advance of this year's annual meeting, but recent scientific findings continue to illustrate the dire need for additional international diplomacy and conservation measures to recover severely depleted Pacific bluefin tuna population to healthy levels.

Recently, the International Scientific Committee (ISC) released a draft executive summary of the 2016 Pacific bluefin tuna stock assessment that reconfirms the need for immediate international action to establish a science-based, precautionary approach to recover the population. We appreciate the improvements that have been made to improve the stock assessment model, and we recognize that the results will not be finalized until July. We remain extremely concerned with preliminary results provided in the draft executive summary and the latest analysis provided by the Commission's science staff. In particular, the population of Pacific bluefin tuna remains at historically-low levels with overfishing occurring at most calculated reference points.¹ These findings are reflected in NOAA's most recent (2015) Status of the Stocks Report that showed overfishing occurring on an overfished stock, demonstrating the unequivocal need for stronger international management measures. In addition, recruitment remains near historically-low levels, with the 2014 estimate as the second lowest in recorded history.² Given the high uncertainty associated with key model parameters, including age at

¹ International Scientific Committee (ISC) 2016. Pacific Bluefin Tuna Stock Assessment – Executive Summary (Draft). Report of the Pacific Bluefin Tuna Working Group. p.7-8. [http://www.iattc.org/Meetings/Meetings2016/SAC7/PDFfiles/INF/SAC-07-INF-C\(a\)-ISC-Letter-IATTC-Executive-Summary.pdf](http://www.iattc.org/Meetings/Meetings2016/SAC7/PDFfiles/INF/SAC-07-INF-C(a)-ISC-Letter-IATTC-Executive-Summary.pdf)

² ISC 2016. Pacific Bluefin Tuna Stock Assessment – Executive Summary (Draft). Report of the Pacific Bluefin Tuna Working Group. Ibid., p. 5-7. [http://www.iattc.org/Meetings/Meetings2016/SAC7/PDFfiles/INF/SAC-07-INF-C\(a\)-ISC-Letter-IATTC-Executive-Summary.pdf](http://www.iattc.org/Meetings/Meetings2016/SAC7/PDFfiles/INF/SAC-07-INF-C(a)-ISC-Letter-IATTC-Executive-Summary.pdf)

maturity and the stock-recruit relationship, it is unclear whether the decline in spawning stock biomass (SSB) has ceased as a result of management measures adopted in recent years. Further, the Commission's scientific staff provided additional analysis that suggests that the population may be supported by only a few strong remaining cohorts, underscoring the need to adequately protect SSB and spawning areas in the Western Pacific Ocean.³

These results are extremely concerning and we urge the United States to demonstrate their leadership in advancing appropriate, precautionary and science-based conservation and management measures for Pacific bluefin tuna as a matter of priority. In the United States, extensive conservation efforts have been introduced in response to previous stock assessments and conservation and management measures adopted by the Commission. In particular, the Pacific Fishery Management Council enacted new regulations in 2015 to reduce the U.S. recreational catch of Pacific bluefin tuna through a reduced bag limit (from 10 fish to 2 fish), and there is strong accountability as a result of legally required fishing log books (now electronic). Furthermore, the California recreational fishing industry voluntarily provides catch, size, and fishing effort data to the California Department of Fish and Wildlife via the California Recreational Fisheries Survey. Finally, all recreationally-caught bluefin are targeted with individual hook-and-line, which is a highly selective fishing method that produces minimal bycatch.

Given these extensive domestic conservation efforts, we request that the United States support measures to end overfishing in the international arena and establish an appropriate long-term rebuilding target and management framework with the objective of maintaining the stock at levels that can produce maximum sustainable yield. Specifically, we encourage you to support science-based precautionary measures as you develop the management framework and the long-term rebuilding plan for Pacific bluefin tuna, including:

- A long-term rebuilding target of B_{MSY} , or an appropriate proxy;
- Specific target and limit reference points;
- Increased protections for mature bluefin tuna on the spawning grounds; and
- Harvest restrictions to reduce mortality of age 0 and adult fish.

We recognize that many of these specific conservation and management measures require coordination with the Western and Central Pacific Fisheries Commission (WCPFC) Northern Committee, and we strongly encourage the United States to redouble diplomatic efforts with Members of both commissions to fulfill the sustainability objectives of both Commissions and the United Nations Fish Stocks Agreement. In addition, we urge you to prioritize additional research that will address the key scientific uncertainties identified above. Finally, we request that the United States encourage other Members of the Commission to establish a Pacific-wide catch documentation scheme for Pacific bluefin tuna that will allow for accurate monitoring of national catches, including sizes and total tonnage.

³ Maunder, M.N. 2016. Updated Assessment and Management of Pacific Bluefin Tuna. IATTC Science Advisory Committee Document SAC-07-05d: 4. <http://www.iatcc.org/Meetings/Meetings2016/SAC7/PDFfiles/SAC-07-05d-PBF-Status-of-Pacific-bluefin.pdf>

Thank you for your continued dedication and leadership in advancing science-based management to recover Pacific bluefin tuna at the Commission. Please let us know if you have any questions and we look forward to working with you in preparation of the upcoming 90th Meeting of the Commission.

Sincerely,



Margaret Spring
Vice President of Conservation & Science and Chief Conservation Officer
Monterey Bay Aquarium



Ken Franke
President
Sportfishing Association of California

Cc:

Barry Thom, Deputy Regional Administrator, NOAA West Coast Regional Office, and U.S. Commissioner to IATTC

Michael Tosatto, Regional Administrator, NOAA Pacific Islands Regional Office

David Hogan, U.S. Department of State

Edward Weissman, U.S. Commissioner to the IATTC

William Fox, U.S. Commissioner to the IATTC

Donald Hansen, U.S. Commissioner to the IATTC