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May 30, 2018

Phil Anderson, Chair  
Pacific Fishery Management Council  
1100 NE Ambassador Place, #101  
Portland, Oregon 97220

**Re: Agenda Item G.2: Recommendations for International Management Activities**

Dear Chair Anderson and members of the Council:

On behalf of The Pew Charitable Trusts, we are writing to convey our recommendations for the U.S. positions with respect to Pacific bluefin tuna management at the upcoming Inter-American Tropical Tuna Commission (IATTC) and Western and Central Pacific Fisheries Commission's Northern Committee (WCPFC NC). Both meetings will provide important opportunities to reinforce the United States' commitment to rebuilding the severely depleted Pacific bluefin tuna population. It will also be vital for the U.S. to stand strongly in opposition to any proposals to raise catch limits, as the species is still overfished and subject to overfishing. We ask the Council to consider the following recommendations for the U.S. position:

- At the IATTC, support a Resolution that continues the current management measure, including the current catch limit, for Pacific bluefin tuna (contained in Resolution C-16-08) for at least an additional two years and updates the Long-term Management Framework to include the Pacific bluefin rebuilding plan agreed to at the 2nd IATTC-WCPFC NC Joint Working in September 2017<sup>1</sup>. This should include this secondary rebuilding target and timeframe as well as the harvest control rules agreed to at the meeting.
- At the WCPFC NC, support the continuation of current management measures (contained in CMM 2017-08) for at least an additional two years, including maintaining catch limits at current levels, as well as ensuring that nations that have exceeded those limits in recent years have a plan to payback the overages.

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<sup>1</sup> WCPFC Northern Committee. Thirteenth Regular Session Summary Report. Outcomes of the 2nd Joint IATTC-WCPFC NC working group on the management of PBF. Attachment E, Annex 2.  
<https://www.wcpfc.int/system/files/NC13%20Summary%20Report%20adopted%20-%20Final%20%28Update%29-clean.docx>

- At both meetings, support discussion and decisions to further the harvest strategy and management strategy evaluation (MSE) process, including agreement on management objectives, candidate reference points and harvest control rules. To increase the transparency and effectiveness of the process, the U.S. should support the creation of an IATTC working group to enhance dialogue between managers, scientists, and stakeholders.

The latest stock assessment for Pacific bluefin tuna, carried out in March 2018, confirms the severely depleted state of the population<sup>2</sup>. The stock is at just 3.3 percent of its unfished levels, and overfishing is still occurring, with fishing mortality at almost twice the sustainable level. While projections show that the population will continue to increase under current IATTC and WCPFC management measures, the projections are heavily influenced by the estimate of recruitment in the last year of the assessment. This terminal year estimate is based on just one source of data and therefore, as the report notes, is more uncertain than previous estimates. In fact, the projection that assumes recruitment remains at recent low levels predicts that there is only a 3 percent chance that the population will meet its secondary rebuilding target by 2034<sup>3</sup>.

Because of the small increase in the population in the last two years of the assessment (from 2.6 percent of unfished levels to 3.3 percent) and the resulting future population projections we expect one or more nations to propose an increase of catch limits at this year's IATTC and WCPFC meeting. However, changes in management at this time would decrease the probability of success of the rebuilding plan and risk the future health of the population. Additionally, catch should not be increased until countries have shown the ability to properly manage their fisheries and comply with catch limits. In the last 3 years, Japan, Mexico, South Korea and the United States have exceeded their limits one or more times. We strongly recommend that the U.S. support the continuation of current measures at both Commissions for at least the next two years. This will allow time for nations to strengthen their domestic management and enforcement of their fisheries and will maintain measures until the next stock assessment can provide updated information on stock status and recruitment.

We also recommend that the U.S. take the lead in committing the IATTC to the rebuilding plan that was agreed to at the Joint Meeting in 2017. It is very important that both the IATTC and WCPFC adopt harmonized language, as they both manage the same stock of Pacific bluefin. An IATTC proposal from the U.S. delegation that includes the agreed secondary rebuilding target and harvest control rules will ensure that Commission members will have the opportunity to commit to the plan that the WCPFC has already adopted.

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<sup>2</sup> International Scientific Committee Pacific Bluefin Working Group. 2018 Pacific Bluefin Tuna Stock Assessment. <https://www.iattc.org/Meetings/Meetings2018/SAC-09/PDFs/INF/English/SAC-09-INF-I-ISC-PBFWG-2018-Pacific-Bluefin-Tuna-Stock-Assessment.pdf>

<sup>3</sup> PBF Stock Assessment. Table 5. Scenario 0.

Finally, we encourage the U.S. to be leaders in the harvest strategy process that is now underway for Pacific bluefin tuna. At the end of May, the ISC held an MSE listening session in Yokohama, Japan. This is the first step in the dialogue between managers, scientists, and stakeholders that is necessary to design and implement a comprehensive and successful harvest strategy. In order for scientists at the ISC to take the next steps, both the IATTC and WCPFC need to agree on a list of management objectives, candidate target and limit reference points and harvest control rules to be analyzed using MSE. We therefore recommend that the U.S. delegation work with scientists and stakeholders to develop an appropriate list of candidates and present them at the IATTC and WCPFC NC meetings.

Both the IATTC and WCPFC have made recent strides to turn the tide for Pacific bluefin tuna. However, the recovery of the stock has just begun, and any changes to management in these early stages of the rebuilding plan threaten its success and the health of the population. The U.S. has an opportunity to be a leader this year at both Commissions, securing a brighter future for the stock and fisheries. Thank you for your consideration of these comments and recommendations.

Sincerely,



Gerald Leape  
Senior Officer, International Government Relations



Paul Shively  
Project Director, U.S. Oceans, Pacific