

HIGHLY MIGRATORY SPECIES ADVISORY SUBPANEL REPORT ON RECOMMEND
INTERNATIONAL MANAGEMENT ACTIVITIES

U.S./Canada Albacore Treaty

The Highly Migratory Species Advisory Subpanel (HMSAS) is disappointed that Mr. Dave Hogan of the U.S. Department of State could not attend this meeting to begin gathering input from industry and the Council on a potential new fishing regime under the Treaty which expires this year. Assuming discussions will not begin until March 2020, we fear this may leave too little time to put in place a new regime (with possible modifications) before the 2020 albacore fishery.

Given that this topic will be discussed in March, we believe it would be premature to provide our thoughts and comments on specifics of a future regime. There are some carry-over items and recent events which do cause us concern:

There has been no movement as far as establishing a catch attribution system for Canadian catch within the U.S. Exclusive Economic Zone (EEZ) and vice versa. This is troubling as it has been discussed for many years and no system has been resolved or agreed to in writing. Even now with changing ocean conditions, the Canadians depend heavily on access to U.S. waters which should give the U.S. huge negotiating clout.

The next very troubling development is Canadian Department of Fisheries and Oceans' (DFO) heavy-handed enforcement of their EEZ/Port Access permit program. As we know, this was mysteriously pulled from the drawer and implemented in 2012, the very same season the regime was suspended. That year it was only for port access of U.S. boats landing albacore, securing crew, and doing maintenance. In the past two seasons it has applied to the Canadian EEZ for fishing. Canadians entering the U.S. waters and ports have a much easier time, which does not seem to meet a reciprocal approach. This season one U.S. boat was seized and the fish were sold after making a paperwork error and forgetting to file the permit and paperwork. Harmonization of paperwork between the U.S. and Canada could be improved.

We (and the participants in the Canadian albacore fishery) are concerned about reported importation of cheap albacore from unknown sources (but assumed to be from heavily subsidized fishing nations). The albacore in question is processed in Canada and the resulting loins are subsequently imported into the U.S. under "Product of Canada" labeling. We ask the Council to consult with the Departments of Commerce and State to investigate this. We believe the Seafood Import Monitoring Program ("SIMP" under NOAA) provides traceability as an avenue for addressing this concern. SIMP requires the importer of record to provide and report key data—from the point of harvest to the point of entry into U.S. commerce—on thirteen imported fish and fish products identified as vulnerable to illegal, unreported, and unregulated (IUU) fishing and/or seafood fraud. Tunas are one of the thirteen imported fish covered. This impacts the price U.S. fishermen are able to get for their catch.

The HMSAS requests that the Council at this time encourage the U.S. Department of State to lay out a formal plan for consultations and discussions on these issues as soon as possible and before bilateral discussions on a future regime are scheduled.

Recommendations to the WCPFC

The WCPFC Permanent Advisory Committee (PAC) met in Hawaii on October 10-11. There were 61 recommendations agreed to which will guide the U.S. Commissioners to the December 2019 meeting of the WCPFC in Papua New Guinea. During an earlier PAC conference call this year South Pacific albacore (SPA) was moved up to the priority issue column. The HMSAS generally agrees with most of the PAC recommendations to the WCPFC and encourages the PFMC to do likewise especially in regards to the SPA which drastically affects a small number of vessels under the PFMC jurisdiction.

The relevant recommendations from the entire report for SPA are available [here](#). In particular, we point to a summary of recommendations below that correspond to bullet numbers 36, 38, 39, 40, and 41 in the PAC report.

- Under harvest scenarios brought forth by the South Pacific Commission, achieve the Target Reference Point (TRP) for SPA as soon as possible.
- The U.S. SPA troll fleet should be exempt from catch reductions under harvest scenarios to reach the TRP.
- All future stock assessments for SPA be conducted throughout the entire range of the stock.
- The U.S. place before the Technical and Compliance Committee (TCC) the flagrant disregard by certain Conservation and Management Measures (CMMs) of the provisions of both the North Pacific albacore and the SPA CMMs and their limitations on effort.
- The U.S. government work with other parties to evaluate the efficacy and relevance of CMM 2015-02 in controlling albacore longline fishing effort to support the attainment of newly-established TRP.
- The U.S. continue to protect the interests of the U.S. SPA troll fleet in qualifying under paragraphs 34 and 37 of CMM 2009-06 (transshipment).
- The U.S. work through the NC to recommend an amendment to WCPFC rules of procedure to set the threshold for a quorum of the NC as [50 percent + 1] of membership.

HMSAS concerns on possible increased IUU catch

The HMSAS would like to bring to the Council's attention, and particularly the Council representatives to the Pacific regional fishery management organizations that the U.S. harvest of North Pacific albacore was only 7,200 short tons in 2019. This amount was similar to 2018 and

2017 and shows a 40 percent reduction from the past 20 year average of approximately 12,000 – 13,000 tons.

U.S. fishermen on the grounds believe there may be a “ghost fleet” operating in the North Pacific that is depressing the North Pacific albacore resource. Besides this potential IUU fleet, an increased harvest of spawner-aged albacore is most likely being caught in fisheries in the Western Pacific while targeting species such as bigeye tuna. This fleet is a concern because it impacts the management strategy evaluation (MSE) process as well as the development of a harvest strategy for North Pacific albacore. We ask the Council to consult with appropriate Agencies in order to determine whether and to what degree a ghost fleet is impacting the North Pacific albacore stock.

From available data, countries such as Vanuatu reported an average of 26 vessels targeting North Pacific albacore from 2002-2004, and has increased to 88 vessels in 2015. This has occurred in other Pacific Island nations as well, for example, Fiji. This seems to be a clear violation of the WCPFC CCM 2005-03 not to increase effort on North Pacific albacore from the 2005 levels.

The HMSAS is troubled that the North Pacific albacore stock may soon be in jeopardy by this increase in effort. What is also concerning is countries that may be expanding harvest in the RFMO areas of jurisdiction are not taking part in the MSE process.

The US albacore fleet is **shrinking!** Since 1995 on average 600-800 individual vessels have participated in albacore fishery on the US west coast. Since 2017 that number has decreased to 450-550 vessels. If this continues, this clean healthy fishery may become a footnote. We encourage the Council to do all they can at this stage to ask questions and find out the reasons for the shrinking of the catch and fleet.