



AMERICAN ALBACORE FISHING ASSOCIATION

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November 6, 2010

Attn: Mark Cedergreen, Chairman
PACIFIC FISHERY MANAGEMENT COUNCIL
7700 NE Ambassador Place, Suite 101
Portland, OR 97220-1384

Re: Agenda Item J.3.c: IUU Fishing & Recommendations to RFMOs, and
Agenda Item K.4.c Future Council Meeting Agenda & Workload Planning

Mr. Chairman and members of the Council,

The American Albacore Fishing Association (AAFA) represents a sizeable portion of the U.S. commercial albacore troll and pole & line fishery. Our association was founded by fishermen seeking to ensure sustainable tuna fisheries through application of the best available science. We believe that effective management is essential to continuing the long tradition of this artisanal and family-oriented tuna fishery.

Our fishermen are strongly motivated to promote responsible management of tuna stocks. AAFA has led the way in implementing market-based incentive programs and rigorous traceability measures.

One doesn't have to look far to see the impetus for successful management. In today's information age, the marketplace welcomes seafood products from responsibly managed fisheries while rejecting those from overfished stocks.

Agenda Item J.3.c: IUU Fishing & Recommendations to RFMOs

AAFA is discouraged by repeated RFMO meetings that allow progress on important management matters to be sidetracked by short-term political and economic interests. We ask the Council to encourage the U.S. section and the WCPFC as a whole, to work harder at establishing and adhering to formal agendas and preparing meeting schedules adequate to address all proposed management matters.

1. IUU Fishing

AAFA seeks to extend support to the WCPFC and the Northern Committee, and cooperate in accelerating adoption of measures to eliminate illegal, unreported, and unregulated

PACIFIC FISHERY MANAGEMENT COUNCIL

Re: Agenda Item J.3.c: IUU Fishing & Recommendations to RFMOs, and
Agenda Item K.4.c Future Council Meeting Agenda & Workload Planning

(Cont'd)

(IUU) fishing. The continued existence of IUU fishing reduces the accuracy of fishery data and undermines the efficacy of corresponding fishery science.

2. Traceability Requirements

AAFA also supports the development and implementation of rigorous traceability requirements to ensure compliance with WCPFC conservation measures. AAFA has designed and put into practice a traceability program that is not burdensome yet allows albacore to be traced from vessel capture to consumer plate. The AAFA program identifies the vessel, captain, flag, fishing gear, catch species, date of offload, weight, and party taking ownership.

We extend our support to the WCPFC and recommend implementing similarly strict measures to better detect IUU fishing in order that it may be addressed and eliminated.

3. Scientific Data Compliance

AAFA welcomes the opportunity to assist WCPFC scientific bodies in obtaining accurate and complete data on Pacific albacore stocks and encourages other fishing organizations and industry members to contribute appropriate data in a timely manner.

4. VMS Program Modification

AAFA pole & troll fishing vessels travel the Pacific Ocean in search of albacore. Depending on a variety of conditions, they may need to travel great distances for their catch. The WCPFC VMS program requirements are inequitably burdensome on the U.S. troll and pole & line fleet.

These VMS requirements impair the ability of our fleet to remain flexible and able to adapt to changes in fishing conditions. We ask the Council to recommend the U.S. make every effort to obtain an exemption from VMS program for vessels of the U.S. troll and pole & line fleet operating from west coast ports.

5. Renewed Leadership and Support for Necessary Science

AAFA encourages the United States to redouble efforts to provide leadership, scientific advice, and financial support within the WCPFC to accomplish the work necessary to protect and manage these important tuna stocks.

The Council has previously expressed its support for the U.S. to contribute funds toward the Biological Sampling Plan Proposal for North Pacific Albacore, as recommended by the International Scientific Committee's Albacore Working Group. ISC8/Annex 9. This sampling proposal is designed to gather essential biological data ("vital rates") that would help to significantly improve the accuracy of stock assessments.

We respectfully ask the Council to repeat this recommendation for the U.S. to contribute funds toward this project and actively encourage its commencement.

IATTC Meeting Schedule

The European Union has submitted a recommendation to hold the IATTC 2011 annual meeting in La Jolla, California from June 29 through July 8. This scheduling would provide the

PACIFIC FISHERY MANAGEMENT COUNCIL

Re: Agenda Item J.3.c: IUU Fishing & Recommendations to RFMOs, and
Agenda Item K.4.c Future Council Meeting Agenda & Workload Planning

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Council with an opportunity at its June meeting to develop timely recommendations for the U.S. delegation. AAFA prefers this location to more distant destinations and believes the schedule of associated meetings would benefit. AAFA requests the Council forward its support for this meeting schedule to the IATTC.

Agenda Item K.4.c: Future Council Meeting Agenda & Workload Planning

Improvement of HMS Permit Database and Characterization of Albacore Fishery Participants

At the Council's April meeting, there was interest expressed in improving the HMS permit database and exploring the possibility for implementing a moratorium period, e.g. 3-5 years, on the issuance of new HMS permits for gear types that harvest albacore.

Such a temporary moratorium would provide a valuable snapshot of the database to allow thorough review of the HMS permits and enable progress toward a better understanding of the nature and extent of HMS permits for participants in the albacore fishery.

AAFA respectfully requests the Council direct the HMS Management Team, with assistance from the HMS Advisory Subpanel and support from National Marine Fisheries Service, to undertake steps to:

1. Improve the accuracy of the HMS permit database by identifying permits which:
 - a. Have selected gear types associated with the albacore fishery; and,
 - b. Which have an adequate measure of albacore landings over an appropriate period.
2. Implement a moratorium on the issuance of new HMS permits for such gear types;

These steps would facilitate the HMS Management Team's steps to:

3. Improve the accuracy of the HMS permit database by removing inaccurate, invalid and erroneous entries while providing the Council and NMFS with a better understanding of the character and scope of the participants in the albacore fishery.

AAFA believes these measures will significantly improve the accuracy of the HMS permit database, the credibility of U.S. albacore fishery statistics, and greatly enhance the Council's ability to manage this important fishery.

Thank you for your time and consideration.

Sincerely,

Chip Bissell
American Albacore Fishing Association