INTERNATIONAL SEAFOOD SUSTAINABILITY FOUNDATION

Position Statement 2018-03
Published October 15, 2018

INTERNATIONAL COMMISSION FOR THE CONSERVATION OF ATLANTIC TUNAS (ICCAT) MEETING, NOVEMBER 12-19, 2018

Tuna Conservation

What are the issues?

Effective management measures are needed to ensure bigeye and yellowfin tuna catches are maintained at sustainable levels.

Why are we concerned?

The 2018 assessment of bigeye tuna clearly shows that the stock is overfished and subject to overfishing. The bigeye TAC has been exceeded by about 20% in recent years. The 2016 assessment of yellowfin showed that the stock is overfished and that overfishing was not occurring in 2014. However, yellowfin TACs are being exceeded by 17% to 37% each year, and the stock may now be subject to overfishing. Exceeding TACs for overfished stocks will worsen their status and hinder their rebuilding to healthy levels.

An added complication is that the catch limit is not allocated between fishing gears or CPCs for yellowfin, and only partially allocated between CPCs for bigeye. As noted by Panel 1, this lack of complete TAC accountability makes it very difficult to take corrective measures.

The SCRS has also indicated that the 2-month FAD closure in the Gulf of Guinea has been ineffective because fishing effort is redistributed to other areas and because the number of active vessels has increased.

Our Top Asks for ICCAT in 2018

1. **Adopt stock-specific tuna management measures that are consistent with SCRS advice; consider alternative measures for reducing the mortality of bigeye and yellowfin tuna in the purse seine fishery; fully allocate the bigeye and yellowfin catch limits by gear and/or flag; and, adopt provisions to ensure catches are in compliance with TACs.**
2. **Immediately address the serious gaps that exist in FAD data reporting, ensure that the ICCAT requirement for non-entangling FADs is being complied with, and promote research into biodegradable FADs.**
3. **Ensure sufficient funding so that concurrent management strategy evaluation (MSE) processes can be completed within the planned timetables.**
4. **Strengthen monitoring, control and surveillance (MCS) measures, such as Vessel Monitoring Systems (VMS), at-sea transshipment regulations and Port State Measures.**
5. **Increase the observer coverage requirements for large-scale purse seine vessels and longline vessels to support data collection and adopt new binding measures that will ensure the safety of human observers, including those on carrier vessels.**

What is ISSF asking ICCAT to do?

(i) Adopt stock-specific management measures for yellowfin and bigeye consistent with SCRS advice and with the elements identified by Panel 1. This includes appropriate and fully-allocated TAC levels, capacity limits that are commensurate with the TAC allocations (see Vessel Registries and Fleet Capacity below), and provisions to ensure catches are in compliance with the TACs.

(ii) Consider alternative measures for reducing the mortality of bigeye and yellowfin tuna in the purse seine fishery, such as strengthened FAD management, limitations on the use of supply and support vessels, expanded time/area closures and effort controls.

(iii) Strengthen its management of tropical tuna fisheries by adopting in-season monitoring of catches to avoid overshooting of catch limits (see Transparency in Catch Quotas below).

Fish Aggregating Devices (FADs)

MONITORING & MANAGEMENT

What are the issues?

Comprehensive data on FAD deployments and usage by all fleets are required to effectively manage the tropical tuna purse seine fishery. In addition, ensuring that currently deployed FADs are non-entangling and moving towards biodegradable FADs in the future are critical steps towards mitigating ecosystem impacts.

Why are we concerned?

In the Atlantic, FAD sets account for nearly 50% of tropical tuna catches — including 67% of skipjack catches. It's time for a concerted global effort to better monitor and manage FAD usage in every ocean region. Since 2013, ICCAT has required the submission of FAD data to the Secretariat for use by the SCRS (Recs. 13-01, 14-01, 15-01 and 16-01). However, each year only a few CPCs submit the required data, usually in an incomplete fashion, thus hindering regional analyses by SCRS. By the time of the 2017 and 2018 SCRS meetings, some FAD data had been reported by a few CPCs. Some stakeholders point to the lack of clear definitions in Rec. 16-01 and unclear data submission forms as the reasons for not reporting. At its 2018 meeting, the SCRS recommended a set of definitions of terms such as those that appear in Rec. 16-01 as well as a revised data submission format which should solve these difficulties.

Shark mortality and other FAD-fishing ecosystem impacts in the Atlantic Ocean need to be reduced. ICCAT has required the use of non-entangling FADs since January 2016 to reduce the entanglement of sharks and turtles. Compliance with this requirement needs to be addressed by ICCAT. Moving towards the use of biodegradable FADs is a critical next step to address marine debris.

What is ISSF asking ICCAT to do?

(i) Immediately adopt the definitions and data reporting form recommended by SCRS, and provisions to ensure that FAD data reporting is complied with.

(ii) Ensure that its requirement for non-entangling FADs is being met, and promote research into biodegradable FADs.

Harvest Strategies

What are the issues?

ISSF applauds the successful meetings of ICCAT's Standing Working Group for Enhancing the Dialogue Between Fisheries Scientists and Managers (SWGSM) over the past few years as well as the adoption last year of Rec. 17-04 on a Harvest Control Rule for North Atlantic Albacore. These actions pave the way for ICCAT to implement a comprehensive harvest strategy for all tuna stocks to maintain such stocks at a level consistent with the objectives of the ICCAT Convention.

ICCAT has embarked on the process of developing harvest strategies and testing them through MSE, with a view to adopt them for priority stocks within a planned timeframe. It is important to understand that this process of concurrent harvest strategy development and adoption constitutes an additional onus for scientists, managers and stakeholders involved, at least during several years. For this reason, the Commission needs to ensure that any additional resources required are made available. This would be preferable to extending the planned timeframes for adoption of harvest strategies.

Why are we concerned?

Harvest Strategies — which include target and limit reference points together with harvest control rules — provide pre-agreed rules for managing fisheries resources and acting in response to stock status changes. It is important to ensure that these pre-agreed rules are robust because these rules and strategies help to rebuild stocks or avoid overfishing. They also reduce the need for protracted negotiations and delays that can lead to further stock declines.

What is ISSF asking ICCAT to do?

Advance MSE for priority species taking into account the recommendations of SWGSM and SCRS, and ensuring sufficient funding to progress this work.

Bycatch and Sharks

What are the issues?

ICCAT needs to improve measures and strengthen efforts to mitigate the bycatch and maximize the post-release survival of vulnerable species in both purse seine and longline fisheries. In addition, science-based conservation and management measures to limit fishing mortality on sharks must be adopted and implemented. Data collection and reporting is essential; therefore, ISSF applauds ICCAT for adopting Recommendation 2016-13 on the Improvement of Compliance Review of Conservation and Management Measures Regarding Sharks Caught in Association with ICCAT Fisheries.

Why are we concerned?

ICCAT is the only tuna RFMO with no guidelines or specifics in its sea turtle or shark recommendations regarding the implementation of best practices for safe handling and release of these species. In addition, ICCAT has not yet adopted measures for the conservation of mobulid rays or to prohibit the intentional setting by purse seine vessels on whale sharks.

What is ISSF asking ICCAT to do?

(ii) Adopt measures to mitigate the incidental catch and maximize the release survival of sharks, mobulid rays, and sea turtles, including best practices for handling and release of such species as have been adopted in other tuna RFMOs.

(ii) Strengthen ICCAT's shark-finning measure [Rec 04-10] by requiring that all sharks be landed with fins naturally attached.

(iii) Adopt a Recommendation to prohibit deliberate purse seine setting around whale sharks, as has been done in WCPFC, IATTC and IOTC.

Monitoring, Control and Surveillance

OBSERVER COVERAGE AND ELECTRONIC MONITORING

What are the issues?

Effective monitoring, control and surveillance (MCS) measures that meet global standards are essential to data collection — promoting compliance with conservation measures, and combatting IUU fishing activities on the water and in port. In particular, comprehensive observer coverage on vessels is a critical component of sustainable fisheries management for tropical tunas.

ICCAT requires 100% observer coverage on tropical tuna purse seiners, but only during the time/area FAD moratorium. Since 2013, ISSF Conservation Measure 4.3(a) has required that processors, traders, importers, transporters, marketers and others involved in the seafood industry conduct transactions only with those large-scale purse seine vessels that have 100% observer coverage (human or electronic if proven to be effective) on every fishing trip, and observing every fishing operation -- even though it is not required by ICCAT year-round. Also, the ICCAT observer requirement for longline fisheries is only 5%. If human onboard observers are not possible for certain fleets or vessel sizes, including longliners, then ICCAT should adopt guidelines for using electronic monitoring.

Why are we concerned?

All large-scale purse seine vessels should have 100% observer coverage on every fishing trip to ensure the collection of critical data on bycatch and discards. Further, the SCRS has highlighted that the current 5% observer coverage requirement is inadequate to provide reasonable estimates of total bycatch. Data on observer coverage in longline fisheries indicates some fleets are not even meeting the 5% mandatory minimum requirement. The paucity of data on longline catches and interactions with non-target species prevents assessments — hindering scientific input on effective conservation measures.

Finally, to ensure RFMOs receive quality data from observer programs, it is essential that these observers can do their jobs in a safe and professional environment.

What is ISSF asking ICCAT to do?

(i) Implement the FAD Working Group recommendation to extend the 100% observer coverage on large-scale purse seine vessels to cover the entire year, as the IATTC and WCPFC have done. Such a requirement would be facilitated if it included a regional mechanism for an observer from a coastal State national program (registered with the Secretariat) to be valid in other countries' EEZs.

(ii) Implement the SCRS recommendations to increase the minimum level of observer coverage to 20% for all major fishing gears and, at the same time, strengthen CPC compliance by identifying and sanctioning non-compliance through the Compliance Committee.

(iii) Follow the example of the WCPFC and IATTC and develop new binding measures that will ensure the safety of human observers, including those on carrier vessels.

(iv) Progress the development of E-monitoring and E-reporting standards for longline vessels, as soon as possible, so that electronic monitoring can be used to ultimately achieve 100% observer coverage in the longline fishery, and in the purse seine fishery during the entire year, in order to provide reasonable estimates of bycatch and to improve overall monitoring of these fisheries and to strengthen transparency of these fishing operations.

TRANSSHIPMENT

What are the issues?

Transshipment at sea presents risks for Illegal, Unreported and Unregulated (IUU) fishing and other illicit activities if not well-managed and transparent. To better manage transshipment, ensure complete data collection and timely reporting, and to combat IUU fishing activities, deficiencies and loopholes in Recommendation 2016-15 must be addressed.

Why are we concerned?

Transshipment at sea can pose a high IUU risk if monitoring, control and surveillance (MCS) measures are insufficient. Therefore, ISSF is concerned by some CPCs' failure to provide required transshipment reports or advance notifications. ISSF also recognizes that electronic monitoring systems and e-reporting are being tested and developed, which could potentially be used to address some of these problems.

What is ISSF asking ICCAT to do?

(i) Amend the ICCAT Transshipment Recommendation 2016-15 to increase the advance notification of transshipment requirement to at least 48 hours and require the submission of transshipment declarations by the fishing vessel to the ICCAT Secretariat and flag State in near real-time, but no more than 7 days after the transshipment event.

(ii) Develop electronic reporting standards for receiving vessels.

MCS TOOLS

What are the issues?

MCS tools are an essential component of sustainable fisheries management. For example, satellite Vessel Monitoring Systems (VMS) strengthen vessel compliance on the water, combat IUU fishing, and improve fisheries management by reducing uncertainty. Port State Measures are also an essential tool for combatting IUU fishing and ensuring fish or fish products from such activities do not enter the market.

Why are we concerned?

ICCAT's MCS tools, such as its vessel monitoring system (VMS) measure 2014-09 and Recommendation 12-07 on an ICCAT Scheme for Minimum Standards for Inspections in Port, must be strengthened and aligned with best-practice standards and the FAO Agreement on Port State Measures, respectively.

What is ISSF asking ICCAT to do?

(i) Adopt further amendments to modernize its VMS measure [Rec 14-09] and bring it in line with global best practices, such as providing for the availability and use of VMS data to the Secretariat, SCRS scientists and the Compliance Committee, and reducing the frequency of transmissions (which is currently 4 hours, which the SCRS has noted is insufficient for most fishing gears), to 1-hour as is required in the WCPFC.

(ii) Adopt amendments to Recommendation 12-07 to better align it with the 2009 FAO Agreement on Port State Measures to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing. ISSF also urges all CPCs that have not yet done so to ratify the 2009 FAO Agreement.

IMO NUMBERS

What are the issues?

ICCAT, like all the tuna RFMOs requires vessels on the ICCAT Record of Fishing Vessels to have an IMO number (Recommendation 13-13), unless such vessels are not eligible to receive one. IMO numbers are a critical tool in combatting IUU fishing and strengthening flag State control, and thus all those vessels that are able to receive an IMO number should do so.

Why are we concerned?

Since the implementation of the ICCAT Recommendation, the threshold for which IHS will grant an IMO number has changed and now "all motorized inboard fishing vessels of less than 100 GT down to a size limit of 12 metres in length overall (LOA) that are authorized to operate outside waters under national jurisdiction" are eligible to receive an IMO number.

What is ISSF asking ICCAT to do?

Bring the change in threshold for issuing an IMO number to the attention of CPCs, and urge all those with vessels on the ICCAT Record of Fishing Vessels that were not previously eligible to receive an IMO number to obtain one as soon as possible.

TRANSPARENCY IN CATCH QUOTAS

What are the issues?

ICCAT has adopted a total allowable catch (TAC), and in some cases, catch limits for CPCs for bigeye, yellowfin, albacore and bluefin tunas. However, during a given year, there is no mechanism for CPC reporting when the total and/or allocated catch limits are being approached and if CPCs are harvesting within their prescribed annual catch limits. Such a mechanism would allow CPCs and markets to make necessary conservation decisions during a given year if quotas are being achieved more quickly than anticipated. Such a mechanism will also strengthen compliance monitoring, and will be important for the implementation of future harvest strategies through catch or effort controls. In addition, scientifically designed projections useful for predicting when an overall limit could be achieved may be able to be developed by using historical patterns informed by in-season data.

Why are we concerned?

A lack of monitoring of how CPCs are approaching, or possibly exceeding, annual individual catch or effort limits for particular tuna stocks, or a total allowable catch or total allowable effort for a specific tuna stocks, prevents rapid and precautionary conservation, management and purchasing decisions within a given year. It also undermines rapid detection of non-compliance with catch or effort controls.

What is ISSF asking ICCAT to do?

(i) Consider requiring CPCs to report their in-season catch or effort status with respect to their Individual catch or effort limits and/or annual TACs or TAEs, where specified; and

(ii) If an in-season reporting requirement is adopted, develop quality assurance mechanisms for verification of in-season reports, including through the use of electronic reporting technologies, to minimize the risk of misreporting.

Compliance

COMPLIANCE PROCESSES

What are the issues?

ICCAT has one of the best designed and most transparent compliance assessment processes of the five tuna RFMOs, but it can be strengthened. CPCs must recognize that a strong compliance process improves fisheries management. In 2016, ICCAT adopted Resolution 16-17 Establishing an ICCAT Schedule of Action to Improve Compliance and Cooperation with ICCAT Measures, which is a positive development and the first of its kind among the four tropical tuna RFMOs.

Why are we concerned?

ICCAT should further improve its compliance process by making binding the schedule of actions to improve compliance.

What is ISSF asking ICCAT to do?

Codify Resolution 16-17 into a binding Recommendation, as soon as possible.

Capacity Management

VESSEL REGISTRIES & FLEET CAPACITY

What are the issues?

Experts agree that there is overcapacity in the global tuna fleets.

Why are we concerned?

ISSF continues to be concerned with the global growth of fishing capacity in ICCAT. Fishing fleet overcapacity increases pressure to weaken management measures, and eventually it leads to stock overexploitation.

What is ISSF asking ICCAT to do?

(i) Establish limited entry through closed vessel registries, and develop a common currency to measure fishing capacity, such as cubic meters of well volume.

(ii) Support the Kobe III call for creating mechanisms to transfer capacity to developing countries.

Did You Know?

ISSF is leading research on biodegradable FADs in collaboration with fleets operating in the Atlantic, coastal nations, and other stakeholders.

ISSF develops resources for the vessel community, including skippers guidebooks on bycatch-mitigation techniques as well as reports on electronic monitoring and vessel monitoring systems.

ISSF offers guidelines for implementing non-entangling FADs.

Three ISSF conservation measures focus on shark bycatch.

ISSF Global Priorities for Tuna RFMOs

Implementation of rigorous harvest strategies, including harvest control rules and reference points.

Effective management of fleet capacity, including developing mechanisms that support developing coastal state engagement in the fishery.

Science-based FAD management & non-entangling FAD designs.

Increased member compliance with all adopted measures, and greater transparency of processes reviewing member compliance with measures.

Strengthened Monitoring, Control and Surveillance (MCS) measures and increased observer coverage, including through modern technologies such as electronic monitoring and e-reporting.

Adoption of best-practice bycatch mitigation and shark conservation and management measures.

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