

ATTN: Heads of ICCAT Delegation

20/11/2019

Joint Atlantic FIP letter

Dear Delegates,

The vessel owners and industry participants of fishery improvement projects (FIPs) in the Atlantic Ocean submit this letter in line with the International Seafood Sustainability Foundation (ISSF) and Global Tuna Sustainability Appeal, to acknowledge progress to date in ICCAT and encourage additional support for measures that will further tuna conservation at the Commission meeting beginning November 18, 2019.

The priorities reflected here, including the comprehensive management of tropical tunas, particularly bigeye and yellowfin tuna, are included in the FIPs to help the fisheries be eligible to meet the Marine Stewardship Council (MSC) standard for certification.

Precautionary Harvest Strategies

We encourage ICCAT Contracting Parties and Cooperating Non-Contracting Parties (CPCs) to adopt precautionary and ecosystem-based management measures, including biological reference points, harvest control rules, increased observer coverage, national management measures and monitoring efforts adequate to ensure harvest strategy objectives are being met for all tuna species under ICCAT jurisdiction. In particular, we are concerned about the state of tropical tuna (bigeye, yellowfin) stocks, and urge parties to adopt the above actions for all gears and Flag States targeting these species.

The role of management strategy evaluation (MSE) is integral to support precautionary and effective harvest strategies. We seek member state delegations to advocate and ensure sufficient funding so that the MSE processes can be completed in the planned timeframe, although an advance on the current program would be desired.

Additional work to validate the catch per unit effort (CPUE) of long line vessels is needed and can improve gaps in information on catch due to limited observer coverage and improve management across gear types.

According to Rec. 18-01 the Commission shall review relevant tropical tuna conservation and management measures in place in 2019. Considering that the SCRS continues to recommend that effective measures be found to reduce fishing mortality of juvenile yellowfin and bigeye tuna, ICCAT should consider alternative management regimes to catch controls.

Reduce Environmental Impact

These FIPs are committed to providing FAD data that improves the scientific monitoring and management of fisheries with FAD usage. The improved definitions and data reporting form based on the SCRS recommendations must be adopted with provisions to ensure compliance. Among the RFMOs, ICCAT has the highest number of FADs allowed per vessel, and we encourage the maximum number allowed to be reduced as an additional measure to protect tropical tuna stocks. ICCAT should seek to support and collaborate with any projects on developing biodegradable FADs and urge CPCs visiting or fishing on FADs clearly identified as experimental to report to their national scientists the status of the FAD (and devices) and their activities on this FAD (including any catch data).

Additional measures must also be taken to mitigate incidental catch and maximize release survival of sharks, mobulid rays, and sea turtles. Currently, ICCAT has not adopted measures for mobulid ray conservation or to prohibit the intentional setting by purse seine vessels on whale sharks or whales, as such ICCAT should adopt a recommendation to prohibit deliberate purse seine setting around whale sharks, as has been done in WCPFC, IATTC and IOTC, and whales in IOTC and WCPFC.

The FIPs will ensure these fisheries adopt best practices for handling and release as in other tuna RFMOs through skipper training, but we encourage ICCAT to conduct studies, increase monitoring and publish information to assess tuna fisheries interactions with Endangered, Threatened and Protected (ETP) species and other bycatch species. ICCAT needs to further improve compliance with ICCAT management measures prohibiting the retention of oceanic whitetip, silky, thresher and hammerhead sharks.

Effective and Fair Enforcement

The lack of complete total allowable catch (TAC) accountability makes it difficult for the Commission to take corrective measures that address overfishing of bigeye and yellowfin, where both TACs have been recurrently exceeded in recent years. Management measures must be adopted for yellowfin and bigeye consistent with SCRS advice. We recommend a reduction in the TAC of bigeye tuna to a level that produces a high probability of ending overfishing and does not hinder the rebuilding of the stock to healthy levels.

To strengthen this, we encourage ICCAT to implement effective management measures to respond to repeated, significant instances of ongoing and/or severe non-compliance.

Interim measures should be applied to manage capacity through closed vessel registries and ensure that stocks are maintained at target reference levels where the probability of breaching limit reference points is low.

Alternative measures to reduce juvenile mortality of bigeye and yellowfin tuna and also bait fish in the fishery should also be considered, and in-season monitoring of catches could be adopted to help avoid overshooting of catch limits.

Making the schedule of actions to improve compliance binding will ensure a strong compliance process and contribute to transparent, fair, and effective enforcement in ICCAT.

Data Quality and Quantity

Data collection and reporting needs to be improved to ensure complete data sets (i.e. catches, effort, size), which are needed for robust stock assessments. Due to unreported and misidentified tuna, there is a large degree of uncertainty surrounding the assessment results of bigeye tuna. Therefore, ICCAT should develop a mandatory requirement for data reporting, and adopt the philosophy of “no data, no fish” for parties who fail to comply. There is no harvest control rule in place and no target or limit reference point. There is the need to monitor flag states not included in the total allowable catch (TAC) allocation to ensure that catches do not exceed TAC level.

Although mandatory, a 5% level of observer coverage is persistently ignored by many fleets operating in the Atlantic under the ICCAT convention area. Compliance measures should be strengthened, and a progressive program to increase levels of observer coverage (human and/or electronic) to 100% on all purse seine and longline vessels by 2025 should be established. The large-scale purse seine vessels represented here continue to implement 100% observer coverage voluntarily, and the FAD Working Group recommendation that 100% observer coverage extend to cover all purse seine fleets year-round should be considered.

Transshipment at sea should be only allowed on fishing vessels with 100% observer coverage (human and/or electronic), and tuna transhipped at sea without observer certification should not access the market.

New binding measures should be adopted to better ensure observer safety, including those on carrier vessels.



**Eastern Atlantic Sustainable
Tuna Initiative (EASTI)**

**Ghana Pole
and Line FIP**

**Eastern Atlantic tuna
Pole and Line FIP**