

**GENERAL STATEMENT RELATING TO THE LETTERS FROM PA2
CHAIR (PA2_616 & PA_617& 618/2020) - ROUND 2 OF
CORRESPONDANCE**

(Submitted by the European Union)

1. Northern albacore (Documents P2-606A and P2-607A)

The European Union agrees with the proposal presented by the Chair, including the increase of the TAC, the pro-rata allocation for 2021 and the revision of the HCR for 2021 (noting that this was scheduled already in the SCRS plan). We also agree with the objective to merge both recommendations next year.

The EU has already expressed that it is not customary to revise the allocation key after a modification of the TAC, but we can understand that there are CPCs reporting N-ALB as by-catch in other fisheries who would like to be included under the allocation table.

2. Western Atlantic BFT (PA2-608 proposed by the Panel 2 Chair and PA2-610 proposed by the United States)

The European Union would like to thank the Chair of Panel 2 for his efforts to resolve the outstanding issues in relation to this stock and for his suggestions for a way forward set out in his letter of 6 November (Document PA2-617).

This year SCRS undertook an update of the stock assessment, which formed the basis for delivering the advice provided in its report to the Commission. This is an important stock, for all the CPCs participating in this fishery, but the warnings over the poor status of the stock, as delivered by SCRS this year, also resonate with the CPCs involved in the Eastern fisheries. This is because the status of the Western stock also affects the perception of sustainability of all Atlantic bluefin tuna.

From experience, the European Union knows that it is never easy to contemplate significant reductions of catch limits, and that the socio-economic impacts of such reductions can put the livelihood of the operators involved at risk. The EU faced similar challenges in relation to Eastern Bluefin tuna not so long ago, eventually leading to the exclusion of several hundred fishers from the fishery. While these sacrifices have been very challenging for the fleets and communities involved, they have not been in vain and eventually contributed to the recovery of the Eastern stock. The European Union therefore urges the Western CPCs to take this into consideration and to follow the scientific advice asking to reduce catches sufficiently in order to end overfishing.

The report from SCRS is quite clear on the quality of the assessments carried out through two different modelling approaches, although further improvements would be achievable through a revision of some indices already planned for 2021. Such consideration on further work to be done on the indices has unfortunately triggered an additional discussion about the possibility to conduct a stock assessment for Western Bluefin tuna in 2021, rather than in 2022 as planned.

The European Union has already expressed its serious concerns for such eventuality in its statement during round 1 (PA-612/2020).

In particular, in the absence of explicit reservations or concerns expressed by SCRS on the quality of the assessment, it is hard to understand why the assessment should be repeated again in 2021, especially when it is already foreseen to perform this assessment in 2022. If there were concerns about the assessment, scientists should have clearly expressed them, notably in the SCRS report. This is not the case.

Beside the procedural aspects and the lack of a clear scientific justification related to this request for a new assessment, the Commission ought to also consider the likely impacts that this would have on the functioning of the Secretariat and the ability of SCRS to deliver on its objectives for 2021. Any possible additional meeting(s), although presented as occurring in parallel to the planned SCRS activities, will inevitably require additional preparations from the Secretariat and will also require the participation of SCRS scientists. In the current context of an already extremely heavy schedule of meetings being foreseen, and considering the uncertainties in terms of the ability of ICCAT to hold physical meetings in 2021, it does not seem wise to consider additional meetings for the purpose a re-running a stock assessment which has just been completed.

The EU believes that a thorough analysis of the indices used for the assessments as planned for 2021 could be completed without the additional constraints related to a new assessment. Such a detailed analysis of indices would be important to inform the parallel ongoing MSE process, including to ensure short-term progress in the development of the MSE-Management procedure where only strict index updates will be allowed.

The main concerns for the European Union relate to the potential impact that this new assessment would have on the MSE process by diverting the attention of the limited human resources from scrutinizing the implications of the reviewed indices for the MSE. The EU has heavily invested in this process and after several setbacks that already delayed the timely completion of the MSE for BFT, we consider that an additional assessment would inevitably further delay this process. In relation to this, we have not received sufficient guarantees from SCRS to alleviate these concerns.

We have also concerns regarding the suggestion that a stock assessment could be conducted by a small group of scientists and presented to SCRS during a short meeting in the autumn. Although the SCRS regularly delegates specific work to smaller groups of experts, there is to our knowledge no precedent of this happening over a very compressed period of time not allowing for an in-depth stock assessment review, like it should be for western bluefin tuna. BFT assessments are notorious for the level of scrutiny and discussion of all aspects of the process, and the EU believes that this level of attention and transparency is required in order for the outcome of the assessment to be seen as legitimate. The suggestions to hire an external expert would not solve this issue and it would be challenging to agree on how to do this within the limited time left for exchanges this year.

The European Union would like to also highlight that if this request for a new assessment was to go ahead, it would create a bad precedent giving the message that a new assessment could be requested regardless of the recently delivered SCRS advice. In addition, there would be a high risk that similar provisions be requested to also facilitate an assessment of the Eastern

stock of Bluefin tuna. Some fishing operators have already expressed their concerns about the potential under-exploitation of the stock and in some cases requested an increase of the TAC. In order for the Commission to consider the suitability of a possible TAC increase, it would be necessary to have at its disposal the advice from SCRS resulting from a new stock assessment. We continue to believe that in the current context, such approach would be unsustainable and therefore we cannot support the suggested amendment of the meetings Schedule for 2021 to conduct a new stock assessment for Western Bluefin tuna.

Regarding the suggestion for a 25% increase of the possible carryover for Western Bluefin tuna, and while carryover can be a useful tool for managers, we are inclined to believe that it should be kept at low levels to ensure compliance with the TAC at the ICCAT level, and to avoid providing incentives for under declaring catches. In this case, we have a further difficulty in agreeing to such a large increase in the context of a stock which is subject to overfishing (as per SCRS).

3. Eastern Atlantic and Mediterranean BFT (PA2-609)

[TAC] The European Union shares the view of the Chair that the best option is to keep the possibility for the Commission to revise the TAC for 2022 in 2021, based on best available scientific information as advised by the SCRS. However, the European Union believes that a revision of the abundance indicators will not be enough to increase the TAC and that a full stock assessment will be required to that end.

[Allocation] The European Union agrees to discuss the requests for quota allocation from Russia and Namibia at the Commission meeting in 2021. However, it should be made clear that this will not trigger the change of the allocation key as defined in Recommendation 17-07. The rollover of the TAC should imply a rollover of the conditions on which the TAC is exploited.

[Panel 2 intersessional] The European Union continues to believe that a peer-review of the plans shall be a regular part of the Agenda of the meeting of Panel 2 intersessional to be held in 2021 and in consecutive years, until the Commission explicitly agree that such meeting could be held virtually as stated in Recommendation 19-04. Considering the many issues found in the plans in previous years and since the rules on capacity are not fixed for a period (catch rates to be revised), the European Union believes that it will important that peer-reviews take place during an intersessional meeting of Panel 2.

[MSE for BFT] The European Union share the views of the Chair regarding the need to advance on MSE as a priority. It therefore supports to hold one or preferably two meetings in 2021. The organization of a meeting between scientists and managers as suggested by the US could be useful in that context.

[BFT farming] Regarding BFT growth rates in farms, the European Union takes this occasion to underline that from a management and control point of view it is important to determine the maximum growth rates between the time of caging (assessed by using stereo cameras and used as official figures to record catches as per paragraph 99 of Rec. 19-04) and the time of harvesting. The calculation of weight before caging is currently not possible (difficulty to get results from stereoscopic cameras at the time of transfer).

[BFT catch by Gibraltar] Regarding the autonomous quota set by Gibraltar, the EU agrees with the Chair suggestion on deferring the discussion to the 2021 meeting while requesting the

Secretariat to contact Gibraltar and clarify the concerns of the Chair regarding Brexit and whether Gibraltar actually export their catches.

4. Letter from PA2 Chair on a draft plan for panel 2 intersessional meeting in early march 2021 (PA2-618)

The European Union takes note of the proposed calendar for the intersessional meeting in March 2021. Due to the exceptional circumstances, the European Union will make an effort to meet the deadlines by submitting a draft plan with the elements at its disposal by date suggested by the Chair. The European Union would like however to recall that this proposal is not in line with the legal deadlines contained in Recommendations [19-04] and to stresses that the it should not set a precedent. Furthermore, any submission of draft plan would done with clear understanding of the European Union that it would be possible to revise and finalise its plan and submit it by the deadline contained in Recommendation, i.e. 15 February.