

AMERICAN ALBACORE FISHING ASSOCIATION

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January 15, 2012

VIA EMAIL TO: nataliewebster@AmericanAlbacore.com

AMERICAN ALBACORE FISHING ASSOCIATION 4364 Bonita Road, #311 Bonita, CA 91902

Re: HMS Management Team Meetings (January 10-12, 2012)

Dear AAFA Fishermen:

I recently attended the meetings of the Highly Migratory Species Management Team (HMS-MT) for the Pacific Fisheries Management Council (PFMC) in La Jolla. The Council had tasked the Management Team with development of a proactive stance toward an international management framework for North Pacific albacore.

As a first order of business, the Management Team held an election to determine its officers for the coming year. The team elected Mr. Kirt Hughes of Washington DFW to serve as Chair for the HMS-MT, with Dr. Stephen Stohs of the Southwest Fishery Science Center serving as Vice Chair.

U.S. – Canada Albacore Treaty

With the election and other administrative matters taken care of, the Management Team addressed the tasks from the Council. The PFMC is scheduled to meet in March and the progress of the HMS Management Team and Advisory Subpanel will be discussed. The Council will also receive a presentation summarizing the recent U.S.-Canada Treaty renegotiations. When the Council last addressed the subject of the treaty, it expressed support for successful negotiations that would continue to allow Canadian albacore vessels to fish in the U.S. Exclusive Economic Zone (EEZ). Since the last Council meeting, WFOA and AAFA joined in calling for a complete halt to reciprocal fishing under the treaty. Only after the effects of treaty fishing are thoroughly studied and considered, and if broad stakeholder support for reciprocal fishing exists, would discussions toward reestablishing reciprocal fishing take place. In such event, the improved health of the U.S. fishery and economy should guide any such discussions.

Management Framework for North Pacific Albacore

In efforts to advance international management for North Pacific albacore, the Management Team provided a series of presentations and held discussions on the suitability of a number of Biological Reference Points (BRPs) that are commonly applied in fisheries management. The Council tasked the HMS-MT to develop a selection of candidate BRPs that would hopefully dovetail with the framework management plan being developed by the Northern Committee. The U.S.

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advocates sustainable management of international fisheries through the adoption of limit and target reference points and harvest control rules.

Biological Reference Points

By way of some background information (*from SWFSC and ISC*): Biological reference points (BRPs) are stock-specific benchmarks that are essential for application of the precautionary approach to fishery management. For tuna, they are usually indicators of stock abundance and fishing mortality rate. BRPs are typically computed for each stock and compared to the current levels of stock abundance (biomass, B) and fishing mortality rate (F) in order to determine the stock's relative health. Because BRPs are linked to stock production, they provide a means of quantitatively measuring the effect of fishing on the stock and for determining desired levels of stock maintenance.

BRPs are often categorized as either target reference points or limit reference points. The FAO Code of Conduct for Responsible Fisheries recognizes these categories as each having specific roles in determinations of stock status.

Target reference points are benchmarks intended to achieve management objectives, and represent desirable outcomes to be attained (e.g., optimum yield). They should not be exceeded on average, or more than 50% of the time.

Limit reference points are benchmarks intended to constrain harvests so that the stock remains within safe biological limits. The probability of exceeding limit reference points should be low, i.e. close to zero. When a limit reference point is exceeded, it triggers significant limitations on the fishery in order to rebuild the stock.

International Management

The recent North Pacific albacore stock assessment suggests that albacore recruitment is stable and the IATTC and WCPFC resolutions to cap effort have helped maintain sustainable levels of catch. The WCPFC Northern Committee has undertaken efforts to develop a long-term strategy for the albacore stock. Such efforts include the introduction of BRPs and a set of pre-agreed decision/control rules that trigger management action. The U.S. views the introduction of a limit BRP and appropriate control rules as a priority. The Northern Committee has prepared a work program to achieve these goals, with a preliminary date for completion in 2013. While the Northern Committee is taking significant steps toward formalizing effective management measures, neither the WCPFC nor the IATTC has yet to adopt BRPs or control rules. An interim objective of maintaining the spawning stock biomass above the average of the ten historically lowest estimated points with a probability greater than 50% has not yet been formally adopted.

AAFA supports efforts to ensure that the interests of this traditional U.S. pole & troll albacore fishery are effectively represented at the international level, and not subjected to unwarranted unilateral restrictions. Greater efforts are needed to address IUU fishing and to address any significant recent catch increases in some fisheries. The WCPFC and IATTC should seek to adopt appropriate BRPs and control rules to secure the sustainable management of the fishery. It is possible that the adoption of management measures for North Pacific albacore will be made more difficult by the fact that the stock has been assessed to be healthy. The poor stock status of other tuna species in the Pacific, including bigeye tuna and bluefin tuna, may make it more difficult to focus attention on albacore.

U.S. Albacore Fishery & Guidance on Response to International Action

The Management Team discussed the history and practices of the U.S. pole & troll fishery and proposed resources for evaluating potential impacts and consequences of adopting different

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BRPs into management. There was mention of the Council's Albacore White Paper and the recent 2011 Socio Economic Study. I expressed strong reservations with respect to the reliability of findings and analysis contained in the 2011 Socio Economic Study. It is widely acknowledged that the study was conducted with insufficient time and resources to produce the kind of solid science that should form the foundation for management decisions.

There was discussion of a variety of possible management measures and the ways in which they might effect different aspects of the fishery. For example, if limitations are necessary, should they be implemented through restrictions on catch? Or on the amount of effort in the fishery? The Management Team will work on developing a range of options for recommending to the Council for consideration in the context of international management.

I reminded the Management Team that U.S. fishermen have long been assured that, in the event of any management measure limitation or restriction on the U.S. albacore fishery, the first action would be to eliminate Canadian vessels fishing in the U.S. EEZ under the treaty. This was acknowledged and noted.

Economic Study of U.S. – Canada Treaty Impacts on U.S. Albacore Fishery

There was discussion of Management Team activities toward studying the economic impacts of the U.S. – Canada Treaty on the U.S. fishery. There were calls to redirect the activities of the HMS-MT and NMFS to address economic impacts of the treaty. A spokesperson for NMFS explained that they were working on conducting economic studies related to the treaty. NMFS and SWFSC were looking at the economic contributions of Canadian albacore vessels. Contributions like: landings in U.S. ports, refueling, purchases while in port, and jobs supported by the presence of Canadian vessels under the treaty. The economic analysis will look at the impacts that might occur if Canadian vessels are barred from fishing in the U.S. EEZ.

I expressed concern that this type of economic study was not a proper evaluation of the treaty's impacts on the U.S. fishery and on U.S. fishermen. Earlier in the meeting, I had inquired as to whether the catch data for the U.S. or Canadian 2011 harvest was available. The response indicated that the final landings for 2011 would not be available until sometime toward mid-February.

Economic Study of U.S. Albacore Fishery

A representative from Lisa Wise Consulting Group gave a presentation on two projects that NMFS has funded to study the U.S. albacore fishery:

1. <u>Albacore Fishery Distribution Chain</u>: The first study will examine the movement of albacore in the distribution chain. The consultant will assist NMFS by collecting and recording the movement of albacore caught by the U.S. West Coast fleet from the boat to the end consumer market.

The work will identify the steps of ownership and transfer including offloading, transport, processing, trans-shipment and final sale in the consumer market. The consultant will conduct extensive interviews, in person, by phone and email with active members of the west coast albacore fleet, buyers, off-loaders, processors, transporters and trans shippers, regulators (US and International), enforcement personnel and other industry participants to learn from where they buy, how much US albacore they buy, when they buy, and percentages, as well as how much they pay, and to whom they sell, tracing the movement of albacore from the vessel to the consumer market.

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Interviews will also include purchasing behavior, where possible: size, age class, catch method, storage method (brine, frozen, etc.), form (in the round, fillet, etc.), port of first landing, certification and chain of custody procedures/standards.

2. <u>Cost & Earnings of U.S. Albacore Fishermen</u>: A second study will have the consultant conduct extensive and detailed surveys of U.S. albacore fishermen.

The surveys will be designed to target information such as: Spending and Variable Economic Cost Data (ex-vessel price, grants, loans, expenditures for ice, fuel, crew share, food, bait, gear and equipment, slip fees, insurance, permits, vessel and gear maintenance, repairs, trans-shipment costs, hired captain {when applicable} etc.)

The survey will also collect information on technology adoption and basic characteristics of the vessel, including crewmembers, years of experience for the captain, whether the vessel is owner-operated or uses a hired skipper (or both).

Following the presentation on these two studies, there was an opportunity to ask questions. I asked if either of these studies was going to examine historical data and provide an analysis that might help put the current data in some perspective. Without other references the studies would simply be an assemblage of data. Data that might be confidential business data or other sensitive information. The response suggested fishermen are assured that data would be kept confidential. A number of additional questions were raised as to how would this benefit the fishermen or the fishery. No solid answers were forthcoming. A primary benefit was claimed to be that the results would be shared with industry.

Conclusion

Having addressed these issues, the meeting wrapped up discussion of albacore. If you have any questions or would like to have further discussions on these matters, please do not hesitate to contact me. Thank you.

Sincerely,

Chip Bissell

Representative & Advisor

American Albacore Fishing Association