



**COMMISSION  
SIXTEENTH REGULAR SESSION**  
Port Moresby, Papua New Guinea  
5 – 11 December 2019

---

**FFA MEMBERS' KEY PRIORITIES FOR WCPFC16**

---

**WCPFC16-2019-DP01  
5 November 2019**

**PAPER BY FFA MEMBER CCMs**



1 November 2019

Jung-Re Riley Kim  
CHAIR  
Western and Central Pacific Fisheries Commission  
PO Box 2356, Kolonia  
Federated States of Micronesia

Dear Riley,

### **FFA MEMBERS' KEY PRIORITIES FOR WCPFC16**

This proposal is made on behalf of the 17 members of the Forum Fisheries Agency. WCPFC is extremely important to us. We have met together at several points throughout the year to discuss and refine our group priorities for WCPFC, and we are pleased to present these for consideration during the WCPFC16 meeting.

The views expressed in the following letter do not include all our priorities – some of which are being presented in separate proposals or letters – and are without prejudice to the positions of FFA members, individual or collective, at WCPFC16.

#### **CMM 2013-06 – Evaluation of Impacts of Commission Measures on SIDS**

FFA members remain concerned about the lack of due diligence applied by some CCMs before they propose new measures or procedures to the Commission. As we have pointed out several times, CMM 2013-06 can only be effectively addressed by consulting with SIDS, either individually or through FFA. This has resulted in measures being presented to the Commission with inadequate or cursory, or even non-existent, assessments of the potential impacts of these measures on small island developing States, and without realistic proposals for helping them to implement these measures if this requires additional investment.

We remind members that the absence of a serious CMM 2013-06 assessment attached to a proposal will be grounds for FFA members not to consider the proposal. We would suggest that CCMs think of CMM 2013-06 as they would any kind of impact assessment process – something that all major economies should be familiar with. Impact assessments require consultation.

Related to this, FFA members propose a reordering of the agenda for WCPFC16 to put agenda item 5 on the Special Requirements of Developing States above agenda item 4 on New Proposals.

#### **Harvest Strategy Workplan**

FFA members continue to strongly support the harvest strategy process in WCPFC, and we note the significant achievements we have made so far, including the agreement of a target reference point for South Pacific albacore at WCPFC15.

We are conscious that we are moving into a new and more complex stage of the work plan. As we consider issues related to targets for multiple species, and how these might be achieved, including through harvest control rules that will impact on multiple fisheries, we will need to consider a range of factors including robust and detailed economic analyses. During the development of the harvest strategy approach so far, it has become clear that further engagement with national stakeholders is essential for successful implementation, particularly in relation to the trade-offs between different harvest strategies.

We note that SC15 endorsed pursuing a hierarchical approach for multispecies considerations, and provided an example of such an approach. FFA members will need further time to consider the implications, and the work required for this approach will involve likely changes to the structure of the work plan. We consider it important that the work plan continues to be ambitious, but it must also be realistic, and we look forward to engaging with other CCMs on this critical work at WCPFC16.

### **Review of the Skipjack Target Reference Point**

CMM 2015-06 provides for a review of the skipjack TRP this year. FFA Members support the SC recommendation that the review of the TRP by the Commission should be informed by an update of the 2014 analysis which was used in establishing the current interim TRP of a spawning biomass depletion ratio of 50%. That 2014 analysis indicated that a 50% TRP was projected to maintain the spawning biomass and purse seine effort around the 2012 levels while achieving a “pretty good yield” of 90% of MSY. The updated analysis indicates that, with the new assessment model, a spawning biomass depletion ratio of 42% is projected to achieve roughly the same fishery outcomes as the 50% TRP was projected to achieve when it was adopted.

However, it is clearly not sufficient to simply adjust the 50% TRP to 42%. FFA Members are keen to avoid a future outcome where the TRP has to be revised again to reflect changes in the assessment model and model results that are not related to the state of the stock. The SC has pointed to the value of using a clearly stated reference period to use as a baseline for a skipjack TRP, comparable to the approach used for the South Pacific albacore TRP agreed in 2018. In that direction, FFA Members suggest that the skipjack TRP should be framed along the following lines:

*The target reference point for the WCPO skipjack tuna stock shall be the percentage of the estimated recent average spawning biomass in the absence of fishing, ( $SB_{F=0, t1-t2}$ ), calculated as the median across the grid of models agreed by the Scientific Committee, that is consistent with the level of fishing effort for skipjack in 2012 and the condition of the skipjack stock in 2012. This percentage is estimated in the 2019 assessment at 42%.*

### **Bigeye and Yellowfin TRPs**

You will recall from WCPFC15 that FFA members stated a clear position on Target Reference Points (TRPs) for Yellowfin and Bigeye Tuna, being to agree TRPs:

- to maintain the stocks above levels where there is a very low risk of breaching the limit reference points consistent with the guidelines in the UN Fish Stocks Agreement;
- to achieve modest increases to  $SB/SB_{F=0}$  compared to recent levels in order to support ongoing economic management of the purse seine fishery and facilitate development opportunities for SIDS longline fisheries.

FFA members note that the Commission is due to agree TRPs for Yellowfin and Bigeye Tuna at the upcoming annual meeting. These are very important decisions in the pathway towards implementation of Harvest Strategies and require careful consideration of the economic, social and biological implications of these TRPs for WCPFC members going forward, including the interaction of these with the TRP for Skipjack Tuna.

Reaching agreement on these at the upcoming meeting is an ambitious and challenging task, given the diverse objectives of Commission members for their fisheries. Should this not be possible, at the very least, constructive discussions must occur that clearly identify Commission members' positions on TRPs for these species, and if necessary, any further technical work required to support a decision in 2020. In the event that TRPs cannot be agreed at the upcoming meeting, FFA members feel strongly maintain that the current objectives for YFT and BET in the Tropical Tuna Measure must be maintained.

### **Timing of Management-Science Dialogue**

FFA members were disappointed at the lack of agreement at WCPFC15 regarding the timing of a Science-Management dialogue meeting when there was general agreement on the TORs. FFA members remain of the view that this dialogue could help the Commission to mainstream harvest strategy development in its work. Consistent with our statements at WCPFC15, FFA members feel very strongly that the meeting should be held immediately after SC, as clearly explained at SC14. FFA would support amendments to the SC agenda to accommodate these additional days.

### **Review of the Transshipment CMM**

FFA Members' reiterate our long-term objective to move towards all transshipments in the Convention Area occurring in port. This is consistent with Article 29(1) of the WCPF Convention which provides that *'the members of the Commission shall encourage their vessels, to the extent practicable, to conduct transshipment in port'*. FFA Members remain concerned about the lack of effective monitoring of transshipment on the high seas, particularly by large scale freezer longline vessels. This constitutes a significant gap in our ability to monitor and verify longline catches on the high seas. We consider this to be a high-risk issue for the Commission.

FFA Members were happy to see the ToRs agreed for the IWG on Transshipment at TCC15 and we now expect the work to commence in earnest, including finalisation of the workplan for the IWG for 2020. The first task is analysis of information and studies on transshipment within the WCPFC Convention Area to determine where the gaps are and identify weaknesses in the current measure including those that might be addressed through additional measures such as EM. We need to ensure there are adequate resources set aside for this important work and for a face-to-face meeting of the IWG in 2020. We look forward to engaging with other CCMs at the IWG meeting in Port Moresby.

### **ER & EM Working Group**

We view the work of this Working Group as extremely important, particularly for the longline fishery where the reporting record by many vessels is poor and the independent verification of vessel reporting is struggling to reach 5%.

As a result of previous work by the Group, the Commission has already adopted an Electronic Reporting (ER) standard for logsheets and observer reporting and ER is now being implemented by many CCMs, including most FFA members.

Now that the standards, specifications and procedures for Electronic Reporting for both operational catch and observers have been agreed for two years, we think this is a good time to set a date for 100% electronic reporting by all active vessels on the RFV, and by all ROP observers. We note that many FFA members are implementing ER for fishing within their EEZs and we propose that ER be implemented for all fishing on the high seas by the start of the 2022 fishing year.

The next step – to recommend Commission-wide minimum standards for Electronic Monitoring (EM) – required further consideration of the role of EM in the suite of the WCPFC’s data collection tools. The work that has been done this year on reviewing Commission data requirements and existing data sources and determining the priority gaps, in our view, now enables the ER&EM WG to move forward with setting objectives for Electronic Monitoring. In particular, we have noted that the longline fishery contains the highest priority data gaps where EM can be useful, given the difficulty of raising human observer coverage above 5%. For any fishery that operates under catch limits, much stronger verification is required.

We look forward to progressing work on the WCPFC EM Standard in the Working Group this year and to progressing the development of a CMM on a WCPFC EM programme. At the same time, we advise that FFA members are progressing the development of an FFA EM Policy and many FFA members are progressing the implementation of EM at national level.

#### **South West Pacific Swordfish**

FFA members note the standing advice from the Scientific Committee relating to the need to strengthen provisions in CMM 2009-03 (Conservation and Management of Swordfish) and we strongly encourage Commission members to engage in discussions over the next 12 months to achieve this outcome.

#### **Mobulid Ray CMM**

We would draw the attention of WCPFC16 to the fact that we are putting forward a proposal for a new CMM to prevent targeted fishing and retention, and to promote safe release of mobulid rays by WCPFC fisheries. This proposal is explained in a separate paper which includes a draft CMM, a 2013-06 SIDS impact assessment and an Audit Points checklist.

#### **Renewal of CMM 2016-05 (Charter Notification Scheme)**

The Charter Notification Scheme is an essential component of WCPFC’s fisheries management framework and, in particular, its facilitation of SIDS’ meaningful participation in WCPFC fisheries specifically working towards achieving SIDS’ development aspirations. Chartering provides one mechanism for SIDS to develop their own commercial tuna fisheries in an incremental manner without requiring an unaffordable initial capital investment.

With this in mind, and given that CMM 2016-05 expires this year, FFA members propose a roll-over of the measure for a further two years.

While no issues have been raised at the last two Commission meetings that suggest that the Charter Notification Scheme is experiencing any difficulties in its application, one minor addition is proposed – that an additional information field be added to charter notifications under paragraph 2 of CMM 2016-05, that will require a charter CCM to advise the WCPFC Secretariat of the area of application that the charter notification applies to. For example, EEZ only, high seas only, or the entire Convention Area.

Also, in relation to the SC15 recommendation on operational data submission for charter vessels (para.3, SC15 Outcomes Document distributed on 29 August 2019), FFA members propose that this SC15 recommendation (below) be addressed through addition to the *Scientific Data to be Provided to the Commission*.

“SC15 recommended that the charter notification issues raised in SC15-ST-WP-01 be taken into account in the review leading to the new/replacement Charter Notification CMM. For example, when the coverage of operational data submitted is not 100% and chartered vessels for that flag state have been notified to the Commission, then the flag state shall submit a list of vessels representing the catches compiled for their annual catch estimates and aggregate catch/effort data (with these data submissions).”

### **Shark omnibus measure**

FFA members strongly support the need to progress the draft comprehensive sharks CMM at WCPFC 16 and thank the Chair and members of the IWG for their hard work. We urge all CCMs to continue constructive dialogue to resolve any outstanding issues preventing the adoption of the draft consolidated shark measure at WCPFC 16.

### **FAC Co-Chair**

FFA Members wish to nominate Liman Helgenberger from FSM as the next FAC Co-Chair.

### **Fisheries Subsidies**

FFA members take this opportunity to reiterate the views expressed by Pacific Fisheries Ministers at the 16<sup>th</sup> FFC Ministerial meeting in June 2019. As referenced in the meeting Outcomes Statement, Ministers:

- *Noted the UN SDG Target 14.6, and the associated commitment of World Trade Organization Members, to complete negotiations by the end of 2019 on a new WTO agreement to prohibit harmful fisheries subsidies.*
- *Expressed their concern that harmful fisheries subsidies can contribute to economic losses in the fisheries sector and create serious distortions in global fish markets and serious impacts on food security and livelihoods, particularly in Small Island Developing States and Territories (SIDS).*
- *Recommitted to engage in these negotiations to deliver on SDG Target 14.6 by the end of 2019. Ministers emphasised that any outcome should not unnecessarily constrain the ability of SIDS to develop their tuna fisheries and that appropriate and effective special and differential treatment for SIDS should be an integral part of these negotiations.*

### **Proposed MOU between WCPFC and SPRMO**

FFA Members are generally supportive of the proposed MOU between the Commission and the South Pacific Regional Fisheries Management Organisation. However, we have concerns about the potential scope of the information and data sharing provisions in the MOU. The protection of confidential information and data that is provided to the Commission is critical. We seek clarity on whether such

information and data will be shared under the MOU, and emphasise the need for effective confidentiality and non-disclosure provisions.

### **SIDS Strategic Investment Plan and SRF**

FFA members look forward to receiving the WCPFC Secretariat's report on the first year of implementation of the Strategic Investment Plan.

FFA members express appreciation for the voluntary contributions from Australia, Canada and the United States to the Special Requirements Fund (SRF). We look to the WCPFC Secretariat to actively seek voluntary contributions to the SRF when funding approaches the US\$150,000 target base level intersessionally, noting that FAC will ensure this target base level is met at each annual session.

FFA members' view is that SIDS' Chair and Vice Chair expenses for attendance at relevant Commission meetings, including attendance at the Annual Session of the Commission by subsidiary body Chairs, are to be covered in addition to support for their delegations.

### **Provision of economic data to the Commission**

All Conservation and Management Measures have a range of effects on the economics of fisheries and hence the benefits accruing to different participants in the fishery. Having economic information is essential to making informed decisions on the economic impacts of proposed CCMs and for setting appropriate TRPs for key stocks. We note the Guidelines for the Voluntary Provision of Economic Data to the Commission have now been referred to SC 16 and we look forward to engaging with other CCMs in the development of the Guidelines and the increased provision of economic data to better inform management decisions.

### **Conclusion**

Through you, Chair, we request the WCPFC Executive Director to include this compendium of views with the Delegation Papers and Proposals to WCPFC16, and invite comments and questions from other CCMs in advance of the meeting. CCMs can direct their feedback to me ([eugene.pangelinan@norma.fm](mailto:eugene.pangelinan@norma.fm)) or to FFA Secretariat ([ffasec.wcpfc@ffa.int](mailto:ffasec.wcpfc@ffa.int)). We look forward to constructive and productive dialogue on these issues at WCPFC 16.

Yours sincerely



Eugene Pangelinan, Chair  
Forum Fisheries Committee