



BUMBLE BEE SEAFOODS

Jan Tharp | CEO

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November 13, 2019

ATTN: Andrew Lawler
Deputy Assistant Secretary for International Fisheries
National Marine Fisheries Service

Dear Drew,

I am writing on behalf of Bumble Bee Seafoods in support of urgently needed tuna management measures in the Western and Central Pacific Ocean, a region for which our government serves as an important leader as a member of the Western and Central Pacific Fisheries Commission (WCPFC).

Bumble Bee has grown increasingly concerned with the management of tuna resources in the Western and Central Pacific Ocean. Our company operates in this region and the sustainability of these stocks is integral to not only our business, but also to the overall marine environment.

Bumble Bee works closely with the International Seafood Sustainability Foundation (ISSF), a coalition of leading scientists, tuna processors from every region of the world and the World Wildlife Fund (WWF), the world's leading conservation organization. Its collective mission is to undertake science-based initiatives for the long-term conservation and sustainable use of tuna stocks, reducing bycatch and promoting ecosystem health, through advocacy, applied science and direct action.

As you prepare our government's positions for the upcoming WCPFC meeting, please consider ISSF's 2019 Position Statement (attached) on their priorities in the region – positions that we wholly endorse. This includes the following top priorities for WCPFC:

- **Adopt a harvest control rule for skipjack that will ensure that the stock fluctuates around the Target Reference Point.**
- **Require 100% observer coverage for longline vessels, and all vessels engaged in at-sea transshipment, within five years.**
- **Adopt science-based measures for FAD limits, FAD marking and tracking and a timeframe for fully non-entangling FADs and biodegradable materials.**
- **Complete the review of the transshipment CMM and adopt amendments to address significant gaps in its effectiveness.**
- **Require sharks be landed with fins attached, prohibit intentional setting on mobulid rays, and adopt a rebuilding plan for oceanic whitetip sharks.**
- **Adopt audit points and accelerate reforms to the CMS, including to provide for observer participation.**

With regard to the development of harvest strategies and the adoption of harvest control rules, Bumble Bee urges our government to advocate for urgent action on these issues at the WCPFC this year. The adoption of harvest control rules and harvest strategies are key Principle 1 conditions for Marine Stewardship Council (MSC) certified tuna fisheries in the Pacific. The MSC has established hard deadlines for these conditions for certified tuna fisheries. For Pacific tuna stocks in the WCPFC and IATTC Convention Areas:

- If a harvest strategy is not in place by **2021** for western Pacific skipjack, current MSC certifications for this stock will be suspended;
- If a harvest control rule is not adopted by **2021** for western Pacific yellowfin, current MSC certifications for this stock will be suspended; and
- If harvest control rules are not adopted by **2021** for southern albacore and by **2023** for northern albacore, current MSC certifications for these stocks will be suspended.

Bumble Bee looks forward to the continued leadership of the United States of America in the Western and Central Pacific Ocean, a region rich in tuna resources that are in need of continued science-based conservation and management.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Tharp', enclosed in a thin black rectangular border.

Jan Tharp
Chief Executive Officer

ATTACHED:
ISSF Statement for WCPFC, 2019 Annual Meeting