East Atlantic Ocean Tuna Pole & Line FIP (EAT P&L FIP)

Management of tropical tuna species: Position paper

December 2020

Executive Summary

This document sets out the position of the participants in the East Atlantic Tuna P&L FIP, in relation to ICCAT's management of Atlantic tropical tuna stocks over the next few years. The FIP participants' position is summarised as follows:

- It is essential that management does not take a step backwards because of covid; in particular the interim measures in Rec. 19-02 must not be allowed to lapse without being replaced with something as strong or stronger.
- The FIP participants strongly support the objectives of Rec. 15-07 and ask ICCAT to continue to prioritise this work.
- The FIP participants support the timetable which has been put forward by ICCAT (in the form of the Tropical Tuna Species Group timetable and the harvest strategy timetable, in appendix to the SCRS report 2019) for developing and implementing a formal management procedure for the tropical tuna stocks. We ask ICCAT to ensure that there is no further slippage of this timetable.
- The FIP participants stress the vital role of capacity-building in this process, such that the CPCs and Commission are able to take informed decisions about MSE inputs (management targets, risk levels and performance metrics). In this context, the FIP asks ICCAT to ensure that the work of SWGSM continues.
- The FIP participants propose that the MSC standard could be used to inform decisions about MSE inputs, even if MSC certification is not an objective for all ICCAT fisheries. On this basis, the FIP would like to put forward the following as a contribution to the debate on the design of the MSE:
    - Stock management targets should be defined as Bmsy or Fmsy; or proxies if evaluated to be consistent with the MSY level.
    - A limit reference point should be agreed not lower than 50% of the MSY level, or 20% of the unfished level. The maximum level of risk associated with the stock falling below the limit reference point should not be greater than 20%.
    - Performance metrics for candidate management procedures should prioritise maintaining stock status at target levels and reducing risk of stock collapse. They should also take into account how the candidate procedures are able to cope with uncertainty.
    - The timeframe to achieve rebuilding of the bigeye stock under the management procedure should be no longer than two generation times; i.e. 10 years; rather than the 15 years (to 2034) proposed in Rec. 19-02.
- Once a management procedure is established, it is vital that there are measures in place which will be able to implement this procedure. Currently the TACs for bigeye and yellowfin are not being implemented in full, and alternative management options should perhaps be considered. As a minimum, there needs to be a robust debate on options for management measures in relation to implementation, as a priority.
- The FIP participants call for a serious effort to rebuild the Atlantic bigeye stock within a maximum of 10 years, and for this to be a key performance metric of the management

procedure under the MSE. Meanwhile, the interim catch reduction measures in Rec. 19-02 (for 2020 only) must not be allowed to expire without a robust replacement.

- It is essential for the protection of non-target species that ICCAT require all FADs to be non-entangling, as well as asking vessels to remove any entangling FADs they find. The regulations on providing FAD data need to be fully implemented across all relevant gear types.

Introduction

This document sets out the position of the participants in the Senegal pole-and-line FIP in relation to ICCAT. Specifically, the document sets out what we are asking ICCAT to achieve in relation to the management of the tropical tuna stocks over the next few years (2021-22). We appreciate that ICCAT's work has been greatly hampered by covid in 2020, but we would nevertheless like to make it clear that we believe that the management of tropical tuna stocks should not be allowed to regress as a result.

Tropical tuna management in 2021

Rec. 19-02 must be reviewed in 2021, and it is vital that work is completed to allow its successor to be more robust, particularly in relation to i) the bigeye TAC, which should be consistent with a robust rebuilding timeframe (see below) and ii) the yellowfin TAC, which needs to be enforceable. The interim catch reduction measures for bigeye in Rec. 19-02 (para. 4) must not be allowed to expire without a robust replacement.

Harvest strategy objectives

The FIP participants strongly support the objectives of Recommendation 15-07: i.e. to put in place robust HCRs (management procedures) for tropical tuna stocks based on MSE and the decision-making procedures agreed in Recommendation 11-13. The FIP participants support ICCAT in working towards achieving these objectives as soon as possible. We ask ICCAT to continue to prioritise this work.

Harvest strategy workplan and timetable

The FIP participants support the timetable for MSE for tropical tuna species (skipjack, yellowfin and bigeye) agreed by the Commission in 2019: and specifically the workplan agreed for the Tropical Tuna Species Group for 2020-21 (SCRS report 2019; Appendix 13) and the workplan agreed for taking forward the harvest strategy process under Rec. 15-07 (SCRS report 2019; Appendix 16). The FIP participants note that these workplans set out activities as follows:

- 2020: Ongoing work on MSE models and coding; MSE discussed and progressed at the tropical tuna species group meeting.
- 2021: MSE technical group inter-sessional meeting on tropical tunas to progress the MSE. SWGSM and Panel 1 to develop proposals for management objectives, acceptable levels of risk and performance metrics. The Commission agrees management objectives, acceptable levels of risk and performance metrics for the tropical tuna harvest strategy.
- 2022: MSE technical group inter-sessional meeting on tropical tunas to complete work on the MSE. External review of the MSE models and code. MSE used to provide scientific advice (Species Group, Panel 1, SCRS). Commission adopts an interim management procedure based on the MSE and scientific advice.

The FIP participants would like to make three points in relation to this workplan and timetable:

1. The Species Group has been tasked by the Commission with an evaluation of different approaches to implementing the harvest strategy (i.e. catch limits vs purse seine effort limits vs. time/area closures vs. FAD restrictions; or other). We believe that this is essential work, since for yellowfin and bigeye, implementation of the current harvest strategy is an increasing problem. However, we do not see where this is operationalised in the Species Group workplan. We emphasise that this task should be a high priority for the Species Group and stress that sufficient time and inputs must be allocated to it over the next two years. Likewise, it is vital that the MSE process be on the agenda for Panel 1 during 2021.
2. It is not clear whether SWGSM is scheduled to meet during 2021 to continue their essential work of liaison and explanation between scientists and managers. We believe that it is vital for a successful outcome of the MSE process that this work continues, such that managers are able to make informed decisions on management objectives, risk levels and performance metrics by the end of 2021, as foreseen in the workplan.
3. The FIP participants appreciate the logic of prioritising less complex single-species MSEs before applying the lessons learned to the interlinked tropical stocks, but it is essential for the health of the stocks and the sustainability of the fisheries that there is no further slippage in the above timetable, despite covid.

Capacity-building

As noted above, a critical point in the progress towards a MSE-based management procedure is that the Commission is able to advise scientists on management objectives, risk levels and performance metrics for the candidate HCRs. These are decisions to be taken by managers, not scientists, and it is vital that managers are able to take these decisions in an informed way, based on knowledge about what the decisions imply for the management of these stocks and fisheries.

The FIP participants therefore ask ICCAT to prioritise capacity-building activities during 2021, to ensure that the Commission is in a position to advise the MSE technical group and SCRS on objectives, performance metrics and risk levels in 2021, as set out in the harvest strategy workplan for tropical tuna stocks. As part of this, we ask ICCAT to ensure that there is a meeting of SWGSM during 2021. The FIP participants also stand ready to work with ICCAT and other organisations on capacity-building in our area, as required.

Objectives, risk-levels and performance metrics for candidate HCRs

As already emphasised, decisions will be required from managers as input to the MSE process, for it to be finalised. Specifically, decisions are required on:

- management objectives (targets) for each stock
- maximum acceptable levels of risk of stocks falling below a given limit
- performance metrics for candidate management procedures – how candidate procedures should be judged against each other within the MSE

The FIP participants are aware that these decisions, to be taken by the Commission, should arise from a process of explanation, discussion and debate between management stakeholders. However, the objective of the FIP is MSC certification of our fishery, and the MSC standard can also be used to inform this process. The MSC standard can be considered to be one definition of good practice for fisheries management, and as such can be considered a useful input into this decision-making process, even for fisheries with no particular aspirations for MSC certification.

For the minimum level of unconditional pass (SG80) under MSC Principle 1 (stock status and management) the following is required:

- Management should be able to maintain the stock at or fluctuating around a level 'consistent with MSY' (PI 1.1.1b and PI 1.2.1a).
- The risk of the stock falling below the 'point of recruitment impairment' (PRI) should be less than 20% (PI 1.1.1a; probability associated with MSC phrase 'highly likely'). In the absence of an estimate the PRI should be set by default at 50% of the MSY level or 20% of the unfished level.
- The success of the harvest strategy is judged (scored) based on the status of the stock in relation to the target level (PI 1.2.1a, PI 1.2.2a) and the robustness of the management procedure (HCR) to uncertainty (PI 1.2.2b).

Based on these requirements we would like to submit the following as a basis for decision-making on these requirements:

- Stock management targets should be defined as Bmsy or Fmsy; or proxies (such as $B_{0.1}$ or other) if evaluated by scientists to be consistent with the MSY level.
- A limit reference point should be agreed not lower than 50% of the MSY level, or 20% of the unfished level.
- The maximum level of risk associated with the stock falling below the limit reference point should not be greater than 20%.
- Performance metrics for candidate management procedures should prioritise maintaining stock status at target levels and reducing risk of stock collapse. They should also take into account how the candidate procedures are able to cope with key sources of uncertainty (to be identified by the scientists).

Implementation of the harvest strategy – current and future

One of the key problems with the current harvest strategy has been in implementing it fully. Specifically, the TAC for yellowfin has been overshot significantly in every year since 2015, while the bigeye TAC has also been overshot since 2017.

Catch limits are an important tool for implementation of a robust harvest strategy, but there are other options which can be used as well or instead. The FIP participants believe that it is critical that there is a robust debate within ICCAT about the merits of these different tools for effective implementation of any agreed management procedure. We have already emphasised that it is important that this discussion is prioritised within the planned work of the Tropical Tuna Species Group, and we would like to see it given wider prominence at ICCAT during 2021; e.g. by consideration by Panel 1 and at the SCRS and the Commission. The FIP participants are ready to support further work in this area as required.

Bigeye rebuilding

The FIP participants note the objective for bigeye rebuilding set out in Rec. 19-02; i.e. a 15-year rebuilding plan for bigeye tuna from 2020, with the objective of achieving Bmsy with >50% probability by 2034. The FIP participants note that this is not consistent with the MSC standard, which sets a minimum rebuilding timeframe of two times the generation time. The generation time for bigeye tuna is estimated at 4.4-5 years (Collette et al. 2011). On this basis, the FIP participants call for a serious effort to rebuild the Atlantic bigeye stock within a maximum of 10 years. This

should be a key performance metric for the management procedure, alongside those proposed above.

The FIP participants note and applaud the additional measures for reducing the exploitation rate of bigeye within Rec. 19-02, and the FIP will work to ensure that our fishery plays its part in implementing these measures. It is, however, likely that further measures will be required for a robust rebuilding plan, and in this context we again raise the issue of putting in place measures that can be implemented in full.

FADs

In relation to FADs, the FIP would like to support and highlight the position statement of ISSF (ISSF 2020), who are acknowledged experts on FAD impacts and design:

- Rec. 19-02 (or its successor) should require that all fleets use fully non-entangling FADs – i.e. with no net, and vessels should be required to remove any entangling FADs they encounter.
- ICCAT should give serious consideration to mechanisms and incentives for fleets to recover FADs at the end of their life.
- Requirements for provision of FAD position and acoustic data, as well as requirements for FAD marking (FAD plus buoy) should be strengthened.
- The Compliance Committee needs to evaluate carefully non-compliance with FAD data reporting requirements, across all fleets, including non-purse seine, and consider both corrective measures and possibilities for support for these fleets.

References

Collette, B.B., Carpenter, K.E., Polidoro, B.A., Juan-Jorda, M.J., Boustany, A., Die, D.J., Elfes, C., Fox, W., Graves, J., Harrison, L., McManus, R., Minte-Vera, C., Nelson, R., Restrepo, V., Schratwieser, J., Sun, C-L, Brick Peres, M., Canales, C., Cardenas, G., Chang, S.-K., Chiang, W-C, de Oliveira Leite, N., Harwell, H.,Lessa, R., Fredou, F.L., Oxenford, H.A., Serra, R., Shao, K.-T., Sumalia, R., Wang, S-P, Watson, R. and Yanez, E. 2011. High value and long life: Double jeopardy for tunas and billfishes. Science 333: 291-292.

ISSF 2020. 2020 ICCAT meeting, by correspondence. ISSF Position Statement 2020-03, published 28 October 2020.