

American Bluefin Tuna Association

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Eric Schwaab, Assistant Administrator for Fisheries
NOAA Fisheries/NMFS
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Dear Eric:

Congratulations on your promotion to the position of Acting Administrator Secretary of Commerce for Conservation and Management effective January 17. We have appreciated your dedication to our issues by your participation in meetings of the Atlantic Highly Migratory Species Advisory Panel, the ICCAT Advisory Committee, travel to ICCAT Plenary meetings such as the most recent meeting in Istanbul Turkey and finally high level policy setting meetings with our Commissioners led by Russell Smith and Dr. Lubchenco. This is especially appreciated in light of your heavy nationwide responsibility for stewardship of U.S. marine resources from Alaska to Maine.

One further note on changes at NMFS is the promotion of Sam Rauch to your current position. Fortunately for our nation's fisheries and fishermen, Sam has been intimately involved for years in national fishery management issues, fishery legal issues and social and economic crisis such as the developing Northeast crisis stemming from new Atlantic cod assessments. Because of Sam's longstanding participation we are not expecting time delays given Sam's demonstrated competence, institutional memory, and no need for a learning curve. We look forward to working much more closely with Sam as he assumes his new responsibilities.

Today, I am writing pleading for NOAA's help, particularly from NOAA Public Affairs and NOAA Fish Watch, to expose a terribly damaging hoax about bluefin tuna by numerous ENGO's now appearing in thousands of publications, TV's programs all year round. I regret to say this misinformation has now found its way into NOAA news distributions. I am speaking of the false notion that bluefin tuna prices paid to fishermen are preposterously high and the leading cause purportedly driving the resource to extinction. Popular flippant phrases used by these groups include that each bluefin caught is likened to "winning the lottery" or so fabulously "profitable" that a fishermen can buy a "Porsche" with every tuna caught.

These stories carried throughout the year are based on a single event that has happened for the last several years on the first reopening day of the New Year for the world's largest fish market, Tsukiji Market in Tokyo. This year the marketing gimmick has a new twist to in but still allows sensational headlines like the one appearing on yesterday's NOAA Fisheries Home Page: **Swank sushi: Tuna fetches record \$736K in Tokyo**. And, of course, the sensationalism is detailed expertly by well prepared reporters influenced by ENGO's to provide the U.S. reader with the U.S. price per pound equivalent (in this case \$1,238.00 per pound) and further microscopically analyzed to record that each slice of the tuna would be ordinarily worth 8,000 yen or the U.S equivalent of \$96.00 per slice. We await this staged media event every year, as most await a scheduled visit to the dentist for a root canal without Novocain.

We have explained in many public meetings and in writing the source of this yearly bluefin marketing publicity stunt by two restauranteurs, one from Hong Kong (Ricky Cheng – Itamae Sushi chain restaurants) and the other from an upscale Japanese restaurant in Tokyo owned by Yousuke Imada. Each year, usually just after a the four day New Year market's closure, they intentionally bid up the price of one bluefin tuna at auction in Tsukiji Market in Tokyo. This bluefin is always of Japanese origin, meaning that it is caught off of northeast Japan and in 2010 reached a preposterous price over \$300K. The stunt received immediate and year round world-wide press hype just as this year's fish will undoubtedly do.

These restauranteurs receive a lot of business and world-wide press for this sensational event from over paying for this bluefin. This may make little sense to us in the west, especially when on the same day at the same auction North Carolina exported fish may bring \$6.00 to \$15.00 per pound or higher given the scarcity of product at this time of year. The extremely high price paid for this Japanese bluefin increases its image as a most traditional culinary and cultural delicacy among Asian consumers. Therefore, it has much greater value to Asian tuna consumers and sellers at all levels because it actually attracts diners to their restaurants who simply want a taste of this expensive bluefin. The twist this year, is that the auction winner was a determined Mr. Kiyoshi Kimura, owner/operator of the chain Sushi-Zanmai who immediately proclaimed he bid the fish up because "Japan has been through a lot the last year due to the disaster(March 2011, tsunami) Japan needs to hang in there. So I tried hard myself and ended up buying the most expensive one" to keep the fish in Japan and away from his competitors. He also pledged to keep the price of the fish to his customers at the regular price and thus absorbing the extravagant expense to his business.

The problem is this once a year event is not representative of the value of bluefin tuna to fishermen around the world and is not a significant cause of overfishing. Let me provide an excerpt from an email I sent on December 29, 2011 in preparation for this staged media event, to Margo Schulze-Haugan, Chief, Highly Migratory Species Division of NOAA Fisheries.

With a quick read of the new NOAA/NMFS HMS SAFE report it looks like you and your staff have again completed a fabulous, updated reference document for all stakeholders to learn from.... I also wish the world and every reporter and researcher could see Page 135 Figure 5.2 which provides average ex-vessel prices for bluefin including for the Northeast United States. They would learn from the NOAA provided price facts that the notion "every bluefin is worth a Porche" is a harmful, misleading "myth" suggested to be the underlying problem causing overfishing. This myth has already significantly damaged U.S. fishermen in the U.S. marketplace.

For convenience of those copied here, I will note the NMFS SAFE Report indicates that the average ex-vessel price of bluefin in the Northeast from 2007 to 2010 was: \$8.31 per pound, \$8.33, \$7.09 and \$9.29 respectively. Thus, for example in 2010 a 310 pound dressed weight giant returned to the fishermen, for his expenses and time at sea, about \$2,879.00. Not even a down payment on a Porshe.

For comparison, the 2010 average price of bluefin is about \$2.00 less per pound than the average price paid to Atlantic sea scallop vessels in 2011 as reported by the New Bedford auction. Under the scallop FMP, scallop trip limits of 18,000 pounds or open area fishing where no trip limits can apply, regularly produce trip landings of 18,000 pounds or higher and the gross stock per vessel per trip can easily be determined. Compared to the average value of a giant

tuna and the traditional 3 fish bag limit, the two fisheries are not even close in revenue to fishermen.”

The point is the price of scallops and some other species are higher than bluefin and NOAA Fish Watch correctly points out the scallop biomass is above the level necessary to produce maximum sustainable yield and no overfishing is ongoing or projected. The high price has no effect on the status of well managed fish with the infrastructure to monitor compliance with catch restrictions, reporting requirements and quality and adequate science underpinning the management plan. Producing \$440 million dollars annually, the sea scallop fishery is the most valuable fishery in the U.S. and the most valuable scallop fishery in the world. The high fish prices are a win-win situation for the U.S. economy, jobs and tax revenues and should be extolled not demonized.

Unfortunately, with bluefin even NOAA continues to foster the market destructive "myth" of exorbitant prices paid for bluefin being the cause of overfishing in its Press Releases. For example, in a November 22, 2011 NOAA Press Release, reminding the public of the regulation prohibiting landing of bluefin caught by trawl nets, NOAA notes that "**Atlantic bluefin tuna are vulnerable to overfishing because they are so valuable**". This inaccurate NOAA statement lends credibility to the myth of the value of bluefin and misdirects the public's attention to the marketplace as the source of the problem rather than rallying public forces to address the real cause of overfishing being the lack of compliance with quotas, lack of management infrastructure in the Mediterranean Sea fisheries (until recent years) and the continuing damage of pirate fishing.

But with bluefin NOAA not only allows the "myth" of exorbitant bluefin fishery to continue but feeds the myth with factually incorrect Press Releases. This damages only legitimate, undeniably compliant oriented U.S. tuna fishermen and fish dealers by allowing ENGO's to mount boycotts and other publicity campaigns that have resulted in wholesale and retail markets in the U.S. declining rapidly.

The US commercial bluefin tuna fishery has domestic and international markets for its product. Bluefin tuna production in the US is, of necessity, extremely limited and, as a result, the US is a net importer of bluefin. It is critically important to note that most of the U.S. seasonally caught bluefin are from artisanal fishing methods (rod and reel and harpoons), one fish at a time and by a small, day boat coastal fishery. US fishermen and fish buyers are committed to maintaining and growing the domestic market for high quality, fresh bluefin. Today, a large percentage of US bluefin catch is shipped to Japan.

However, the tragic tsunami that hit Japan earlier this year has demonstrated to the US bluefin industry that this extremely important customer is vulnerable, not only in terms of natural disasters but also in connection with global economic forces, as well. Consequently, it is in the long term interest of the US bluefin fishery that it reduce its dependency upon the Japanese market but this strategy necessitates further development of the domestic market.

With a very long regulatory history and given numerous and costly public relations campaigns undertaken by ENGOs over the past several decades, we find that the US consumer is, in general, not favorably disposed toward purchasing our product. Bluefin tuna, unlike any other oceanic species, will command headlines in the media. Boycotts organized and promoted by groups like the Center for Biological Diversity boasting of 30,000 consumers signing petitions to not eat bluefin hurts, first and foremost, compliant U.S. fishermen. This occurs despite NOAA consistently putting forth and accurately so the U.S management of bluefin as exemplary at ICCAT. This includes additional voluntary measures,

not required by ICCAT, that clearly create a situation where U.S. fishermen are doing more to conserve bluefin than any other country in the world since 1981.

We are certain that the Agency will understand that, as an example, a campaign undertaken to influence restaurants nationwide to stop serving bluefin tuna based upon such specious rationale as, "the last bluefin will be eaten within the next year", can be very damaging to our domestic market. Further, it is important to note that there are customers in the US who purchase bluefin tuna directly from Tsukiji Market in Tokyo and it is indeed ironic that it is possible that they may be purchasing from Japan bluefin which has been caught in our waters. In short, we have serious problems with our domestic market and the Agency is in a position, at little or no cost to itself, to help the fishery recover from the onslaught of negative press and overzealous public relations misinformation campaigns about bluefin.

Thus, we are asking for some fairness from NOAA and NOAA Public Affairs to engage in a sustained campaign of correcting the "myth" through major media sources and not allow environmental groups fund raising strategies to go unchallenged. Only authoritative sources like NOAA or the U.S. Congress and ICCAT have the credibility, visibility and resources to achieve this objective. The highly profitable campaigns for ENGO's based largely on distortion of the price does disservice to the motivation and sacrifices of U.S. commercial and recreational fishermen who fish for and respect the bluefin as a magnificent creature, the "Olympian of the Seas" to battle and conquer and for the nutritious protein, Omega 3's and selenium they provide and respectable, well earned profit for exceptionally experienced and hardworking fishermen. Recreational fishing for bluefin also provides hundreds of millions of dollars of economic activity with modest required mortality.

I hope NOAA will sincerely agree to launch such an aggressive campaign with the media to counter the damage NOAA has partly sanctioned by its silence. Such a campaign under existing NOAA media capabilities (please see <http://www.noaa.gov/media.html>) would be entirely consistent with the NOAA stated Mission. We believe NOAA has an obligation to help the U.S. tuna situation by just insisting on accuracy of NOAA press releases and a similar obligation with activity from other public or semi public news entities. Scientific findings of "equally plausible" alternative recruitment assumptions provide a much more optimistic outlook for bluefin and one dropped from all NOAA literature with no public vetting of the decision or rationale by NOAA only since 2009.

In support of a positive response from NOAA, U.S. fish dealers have already protested the marketing gimmick to Japanese auction companies we do business with and requested they seek alternative market enhancement strategies. ABTA is prepared to seek help directly from the ICCAT Secretariat, Japanese government officials and Mediterranean fishing nations to make public the ordinary prices they receive from their production.

I hope NOAA leadership will make this a priority for the correct offices within NOAA. We anxiously await a NOAA initiative and response to our urgent request here. We are determined to end the myth, one way or another, and we think it is reasonable for us to expect U.S. government help.

Sincerely,

Rich Ruais, Executive Director
American Bluefin Tuna Association

CC: Russell Smith II, U.S. ICCAT Commissioner
Sam Rauch, Acting Assistant Administrator for Fisheries
Driss Meski, ICCAT Executive Secretary
Masanori Miyahara, ICCAT Chairman
Selected U.S. Congressional Representatives
Monica Allen, NOAA Public Affairs
ABTA Board of Directors