



THE AMERICAN BLUEFIN TUNA ASSOCIATION  
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Federal U.S. Commissioner to ICCAT

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Dear Commissioners,

I am writing to you today on behalf of the American Bluefin Tuna Association (ABTA) to comment on the recent ICCAT Standing Committee on Research and Statistics (SCRS) report on Northern Atlantic bluefin tuna (BFT). We are also writing to state our objectives regarding changes to the eastern and western quotas justified by the latest assessment under a new agreement expected to be developed at the upcoming ICCAT meeting in Paris.

We believe the new SCRS data is the most positive data on conservation and management progress that has been presented to ICCAT since SCRS began assessing BFT in the early 1970's. The results should be viewed first and foremost as a success story and one that the United States was instrumental in creating. For many years the US has taken a leadership role at ICCAT in an effort to help rebuild all regulated stocks, but especially BFT and North Atlantic Swordfish. Further conservation and research efforts remain to be completed by all Contracting Parties and BFT stakeholders to secure an efficient, effective and equitable long-term conservation plan.

### **SCRS Report Results**

#### *Western Atlantic*

Specifically, the SCRS report states that under the two-line recruitment scenario- the scenario chosen to rebuild the western stock-, the assessment indicates "that the stock has been above convention objectives since 1970 and that fishing mortality rates have been below convention objectives since 1983." (P 26) The report goes on to say that, "recent F (geometric mean from 2007-2009) is 30% to 40% below  $F_{MSY}$  and 20% to 30% above  $F_{0.1}$ . Spawning stock biomass is 20% to 60% above  $SSB_{MSY}$  and 10% to 30% below  $SSB_{F0.1}$ ." (P 23)



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In short, the SCRS report shows that there has been great success in the west: the stock is at BMSY, it is fully rebuilt and there is a relative SSB of 1.1. This report also shows that our understanding of the status of western BFT is improving and our quota and other conservation restrictions are paying off.

We acknowledge, of course, that there continues to be some debate over which scenario is the proper scenario to use for western BFT: the two-line recruitment scenario, which is based on recruitment levels identified in the west for more than 30 years, or the high recruitment scenario, which is based on recruitment levels allegedly occurring pre-1971 under a higher SSB (even though no stock/recruit relationship has even been established).

The western bluefin recovery plan is based on the two-line scenario first adopted and promoted internationally by the US under then US Federal Commissioner Rollie Schmitt. This scenario has subsequently been reaffirmed as the basis of the recovery plan and US domestic policy under US Commissioners Dr. Bill Hogarth and Dr. Rebecca Lent and stock assessment projections (or updated advice) and quotas set in 2000, 2002, 2004, 2006 and 2008. Similarly, the consistent and unambiguous consensus at ICCAT has been to manage the western stock using the two-line model and the current assessment shows this has been a successful strategy. The bottom line is that the US has repeatedly considered the SCRS advice concerning the two-line and high recruitment model results and in response has consistently adopted the TAC generated by the two-line model as its official position. And there is nothing presented in the current SCRS report that would compel a change in the US or ICCAT position in basing the management of the western stock.

We would also emphasize the often-repeated advice from SCRS that the “Committee has no strong evidence to favor either scenario over the other and notes that both are reasonable (but not extreme) lower and upper bounds on rebuilding potential.” (P 82) Therefore, the low recruitment scenario is sustainable (and in our opinion more plausible) than the high recruitment scenario especially if lower yields continue in the eastern Atlantic and Mediterranean. The idea that now that success has been achieved and is confirmed by SCRS under the two-line scenario that we should raise the target bar and choose another scenario (requiring continuing low or lower western quotas) is hard for our fishermen to comprehend and they will not accept it.

*Eastern Atlantic*

Management in the eastern Atlantic and Mediterranean Sea was a complete disaster for the better part of two decades. But, due in large part to the concentrated attention of the US and other conservation minded entities, and the hard work of scientists reported in the ICCAT 2001 Report of the ICCAT Workshop on Bluefin Mixing major changes have been taking place in those fisheries in recent years. Reporting has improved (and now includes some size data), catches have been reduced dramatically, observers are being required on vessels and at European Community farms, spawning protections are being implemented with an effort to reduce loopholes, and in general management infrastructure is finally developing. As a result the SCRS has specifically dropped any reference to “stock collapse” in the current stock assessment. This declaration was prominently noted in the past. The SCRS report shows reason for cautious optimism for the long-term prospects. The significance of SCRS consciously eliminating this concern cannot be over-



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emphasized in light of continuing frivolous efforts to suggest threatened species or extinction concerns for any Northern Atlantic bluefin tuna.

**ABTA's Recommendations**

*Western Atlantic*

According to the SCRS report, and specifically the Kobe II Matrix, it is clear that an increase is fully justified in the TAC for the western Atlantic fishery. The plan calls for a greater than 50% chance of success for rebuilding in the west by 2019. According to the Matrix, the TAC in the western Atlantic could be raised to 2500 mt with a 78.2% probability of remaining above BMSY level and an increase to 2,250 mt will allow for an astounding 86.2% probability of remaining above BMSY in 2019. (Table 13 or Table 1 in the Executive Summary)

The western Atlantic fishery has been strictly managed since the beginning of ICCAT. While historical landings were as high as 18,761 mt in the 1960s, landings steadied to around 5,000 mt in the 1970s. In 1982 a greater than 60% cut was unilaterally imposed in the west, and then another cut was mandated in the 1990s. The catch levels were restored slightly in early 2000 before the most recent reduction in the TAC was imposed from a level of 2,700 mt down to 1,900 mt in 2009 and now 1,800 mt in 2010.

We believe that US and other western Atlantic fishermen have worked hard to conserve the stock and now that the SCRS data shows that an increase is more than warranted, that the US should fight for such an increase at ICCAT later this month. While the data shows that the TAC could be raised as high as 2,500 mt and still easily achieve the probabilities required, ABTA believes that the US should push for at least a modest increase to 2,250 mt in Paris.

Fishermen in this country (and others in the West) have endured significant unilateral economic sacrifices to conform to the many different rules and regulations imposed upon them in recent decades. The US should show these fishermen that such sacrifices will be rewarded and the way to do this is to insist upon a modest increase at ICCAT. We note, with considerable displeasure and consternation, that according to the SCRS report, the western fishery could have been yielding an MSY exceeding 2,500 mt since the 1970s, while cuts to lower levels have led to enormous amounts of lost money, jobs and coastal economy. Now that the data is clearly supporting an increase, the right thing to do is to fight for it.

On a related point, some have raised the concern that the eastern and Mediterranean nations may argue that if they are going to reduce their landings to 13,500 mt or some lower level, that the west should further reduce its landings. We expect the US leadership to reject this notion that the conservation efforts of the eastern Atlantic and Mediterranean fishing nations are today on a par with those of the west. The reasons for this are many.

First and foremost, as can be seen in countless documents covering the history of ICCAT management, the west has implemented significant and costly measures to conserve BFT since the very beginning. The overall western quota is now a historically low 1,800 mt, a level that is already causing issues for US fishermen.



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As the SCRS report states, “The US bluefin fishery continues to be regulated by quotas, seasons, gear restrictions, limits on catches per trip, and size limits designed to conform to ICCAT and domestic recommendations.” In regards to size limits, for example, the US has long had the largest minimum size in the Atlantic- 73 inches. Furthermore, the western fishery has consistently shown the ability to both enforce these rules and regulations and to ensure that proper and timely reporting was achieved. Lastly, the western fishery has even taken the step of drastically reducing the amount of underage rollover allowed from one year to the next.

It is this hard work on behalf of western fisheries that led the ICCAT Independent review to note that, “the strong positions taken by the US, Canada, Japan... and adopted by ICCAT have led to slow rebuilding of this stock.”

The evidence that US leadership should cite if refuting any complaints from the east regarding a modest western TAC increase can be seen in the aforementioned ICCAT Independent Review done in 2008. For example, the report states that, “While management measures for the West Atlantic have been adopted and implemented in the early 1980s...very little appears to have been implemented in the East Atlantic and Mediterranean: large catches of juveniles are believed to continue to occur in some areas, catches of larger and more successful spawners have increased substantially, new purse seiners continue to be added to the fleets and fishing has expanded in areas that previously acted as refugia.” (P 46) In 1974 ICCAT mandated that bluefin catches were to be frozen at “recent levels”. While the US and other western fishing nations complied, the eastern Atlantic and Mediterranean fishing countries actually increased their catches to historic and damaging levels. While the US froze the east exploded!

The review goes on to point out that, “The management by ICCAT CPCs in the Mediterranean is widely seen as an international disgrace.” In regards to reporting, the report explains that, “catches of bluefin tuna from the eastern Atlantic and Mediterranean have been seriously under-reported in recent years...Furthermore, to the detriment of the assessment, unenforced TACs were allowing under-reporting of overall catches, and incomplete compliance with size limit regulations may have affected information for catches of small bluefin.” (P 59-60) All one needs to do is look at the landings between the 1990s and 2007 to understand the level mismanagement in the east.

While the east recently has taken the necessary actions, we are decades ahead of them and there is no justification for any further reductions in the west. For too long our fishermen have made sacrifices while the east ran wild, and any further cuts here will meet with great consternation in the US and with a fierce reaction in the domestic fishing industry.

*Eastern Atlantic*

However, the SCRS report states that, “The implementation of recent regulations through [Rec 09-06, and previous recommendations] has clearly resulted in reductions in catch and fishing mortality rates.” And while the report goes on to state that there is some uncertainty involved, that, “...the Committee notes that maintaining catches at the current TAC (13,500 mt) under the current management scheme, for 2011-2013 will likely allow the stock to increase during that period and is consistent with the goal of achieving FMSY and BMSY through 2023 with at least 60% of probability.” (P 27)



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Therefore, while we will again urge the US leadership to continue to stay vigilant on the issue, and to push for continued improvements across the board, we believe that the science is pretty clear and that the objectives can be achieved with an eastern TAC of 13,500 mt.

We would also like to point out that ICCAT continues to meet on a regular basis and that these TACs are going to be revisited within two years. While the science is pretty clear in both cases, this issue will be revisited and changes can be made as necessary.

### **Uncertainty**

Some have stated that the SCRS data and advice for western stock involves a lot of “uncertainty” and that this somehow minimizes the positive results. We would first point out that the issue of uncertainty is one that is seen across the board when it comes to fishery management and has been since fishery management began. The issue of uncertainty has been a constant in past bluefin advice; as a result, past quota cuts have been based on data with this same level of uncertainty. Uncertainty is a fact of life and the best ICCAT can do is manage with the best science it has available. Part of the reason we are suggesting that the US should push for a TAC level of 2,250 mt is because it allows for such a high- 86.2%- probability of achieving the goal. Most fishery management in the world is based on neutral risk, i.e., 50% of greater probability, even with high levels of uncertainty in the scientific advice.

We would also point out that a key source of this uncertainty is the level of mixing and, in turn, catch levels and management measures in the east. As the SCRS report notes, “The conclusions of this assessment do not capture the full degree of uncertainty in the assessments and projections. An important factor contributing to uncertainty is mixing between fish of eastern and western origin.” (P 23) The level of mixing is a critical issue that the US industry has been stressing for many years.

The current assessment process does not take into consideration mixing levels despite the fact that the levels are proven to be very high at times. As the SCRS concludes, “...both the productivity of the western Atlantic bluefin and western Atlantic bluefin fisheries are linked to the eastern Atlantic and Mediterranean stock. Therefore, management actions taken in the eastern Atlantic and Mediterranean are likely to influence the recovery in the western Atlantic, because even small rates of mixing from East to West can have significant effects on the West due to the fact that Eastern plus Mediterranean resource is much larger than that of the west.” (P 28)

While “two stock” theory was chosen by some years ago, the proof has long existed that the mixing between different bluefin groups is a fact of life. While this early “spaghetti” tag data was dismissed when the “two stock” theory (and the arbitrary dividing line) was adopted, the electronic tagging data, along with new micro-constituent analysis, collected over the last decade and a half has shown without a doubt that mixing is significant. The growing evidence of the extent and complexity of mixing combined with the view that multiple spawning sites may exist, speaks strongly to the possibility that managing these stocks separately is a flawed, inefficient (if not unfair) basis for a conservation program of a shared highly migratory resource.



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Mixing has existed for millennia and was going on during the years of uncontrolled eastern fishing and yet we survived here in the west. Now that the east has reduced landings and increased compliance overall, the numbers of bluefin available to western fishermen is likely to increase dramatically and rapidly. So while we would strongly urge the US leadership to continue to advocate for better mixing research and eventual inclusion of that research into the assessment process, we do not accept uncertainty caused by mixing as a rationale against a TAC increase in the west.

Lastly, we understand that some of the positive changes in the SCRS advice are based on the implementation of the new growth curve adopted recently by SCRS for western BFT. While this may be the case, this does not change the underlying advice of the SCRS and the optimistic tone of the report. Therefore we do not believe that this issue should in any way effect the position of the US at ICCAT.

### **Conclusion**

The recent SCRS report presents a success story. The recruitment scenario explicitly chosen by the US to establish a sustainable western stock biomass has achieved its goal. The new data shows that an increase in catches in the western Atlantic is warranted, and we believe the US delegation should fight to increase the TAC in the west to 2,250 mt, which will still allow for a very high probability of success within the time frame outlined by the plan. While some have tried to use the “uncertainty” aspect to argue that the science is not positive, we urge the US delegation to see through this and view the new science for what is: success. US and Canadian fishermen have worked hard to rebuild this stock and they deserve an increase based on this new data. With the reductions in the east the continued sustainable fishing here in the west, success is assured.

We also want to reiterate that the changes in the East have been substantial and this has led to the SCRS dropping any reference to stock collapse. We would also remind you that the SCRS report made very clear that what happens in the east is critical to what happens in the west. Continued progress in the east and Mediterranean will only add to the probability of further good year classes and a precautionary approach to conservation and management in the west.

Thank you for taking our views into consideration as you prepare to discuss the US TAC objective with other NOAA leadership and the US Congress.

Thanks for your time,

Rich Ruais  
Executive Director