



## New Hampshire Fish and Game Department

### Region 3

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Glenn Normandeau  
Executive Director

January 28, 2010

Mr. Robert R. Gabel, Chief  
Division of Management Authority  
U.S. Fish and Wildlife Service  
4401 North Fairfax Drive, Room 212  
Arlington, VA 22203

Re: Cop15 & Northern Atlantic Bluefin Tuna

Dear Mr. Gabel:

The State of New Hampshire has a very active fleet involved in the fishery for Atlantic bluefin tuna and we therefore have been following the effort led by Monaco to have bluefin tuna listed on Appendix I of CITES. Fishermen from our state are involved in all aspects of the fishery and they are concerned about the negative impacts a CITES listing would have on them.

In December, as my agencies representative on the New England Fishery Management Council, I supported the unanimous vote by the New England Fishery Management Council to oppose U.S. support for a CITES listing. We continue to oppose a listing for bluefin tuna for both biological and political reasons.

First, we do not believe that there is biological justification for a listing. According to the report recently completed by the ICCAT Standing Committee on Research and Statistics (SCRS), the most recent bluefin tuna stock assessment concludes that there are roughly 5 million eastern Atlantic bluefin tuna with a spawning population of roughly 1 million fish (Doc. No. PA2-604/2009, 10/30/2009). The report also estimates that the figure for the smaller western Atlantic population is roughly 170,000 fish.

Equally important is that SCRS believes the recent changes made by ICCAT have a high probability of success in the west. The SCRS concluded that under the current TAC of 1,800 mt "the probability that the spawning stock biomass (SSB) in 2019 will remain below 20% of max SSB is 9% and the probability that SSB in 2019 will be below SSB<sub>0</sub> is 95%. However, in all cases the results indicate it is very unlikely that depletion will continue. In more than 99% of the model realizations, SSB in 2019 was predicted to be greater than SSB in 2009." As such, we believe that the current management system ensures that the western stock will be rebuilding and that there is no threat of extinction or collapse.

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Furthermore, the SCRS concluded that bluefin tuna do not meet several criteria for listing; for example, it concluded that it does not fit the criteria that the “wild population is small.” The SCRS also pointed out that the spatial distribution of bluefin tuna is generally considered to be wide.

In regards to the eastern Atlantic stock, it is critical to note that ICCAT recently made dramatic changes how the stock is managed. The TAC for the east has been reduced to 13,500 mt for 2010, and with overage deductions this number will likely be closer to 12,000 mt. This dramatic reduction, combined with the extension of the purse seine closure to 11 months, is an important step forward at ICCAT and is generally viewed as a great success. Even more important is the fact that the new agreement calls for the establishment in 2010 of a rebuilding plan that will allow for a 60% probability of achieving  $B_{MSY}$  by 2023. This is likely to translate to a TAC of less than 8,500 mt for the eastern stock. Given these changes at ICCAT regarding the eastern stock, we believe that the current population of 5,000,000 fish will increase and that there is therefore not threat of extinction.

Despite the importance of these biological objections to the listing, my Department also has political, social and economic reasons for opposing it. While there has certainly been problems with management of this stock in the past, particularly in the eastern Atlantic, we do not believe that a CITES listing is a logical step forward at this point. ICCAT has the expertise and the capability to best manage this fishery and the recent changes will allow for past problems to be corrected.

As previously mentioned, this fishery is important to fishermen both in our state and in many others along the east coast. US fishermen have been managed according to the science for almost three decades and have made many reductions in harvest over the years in order to conserve the stocks. A CITES listing will only serve to punish these fishermen and it will do so on the heels of major changes at ICCAT that most believe will rebuild the stocks. We strongly recommend that the US oppose the listing of bluefin tuna and allow ICCAT to continue its role in managing this fishery.

Sincerely,



Douglas Grout  
Chief of Marine Fisheries Division  
New Hampshire Fish and Game Department

CC: Governor John Lynch  
Glenn Normandeau