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September 9, 2009

By e-mail to scientificauthority@fws.gov

Re: Cop15 & Northern Atlantic Bluefin Tuna

A CITES listing for the Atlantic bluefin tuna is no substitute for a long term sustainable rebuilding plan. It reminds me of the Iraq war. The battle was successful, but left with out an exit strategy, we are still there today. What after Cites? Do you return Bluefin management back to the flawed ICCAT regime that failed it in the first place?

The 2008 ICCAT "Independent Performance Review report" that was performed on it self clearly asked for your help (CPC's). Recommendations in the 2008 ICCAT Performance Review Report outline formula to "move ICCAT forward". CITES was not one of them and delays the real work necessary to build the improvements at ICCAT required to successfully manage and enforce the ICCAT mandates. CITES takes power away from ICCAT at a time when empowerment is requested.

The ICCAT Performance Review report fixes the blame for not meeting objectives on the "lack of compliance by many of its CPC's". Because of the lack of forth coming reporting and failure of CPC's to control their catches the report recommends the development a strict penalty regime with member suspension or significant financial penalties for breaches. It recommends an immediate closure of the East and Mediterranean fishing areas, reopening after CPC's demonstrate they can control and report their catch. The report also recommends immediate closure of all Bluefin spawning areas and evaluation of consequences of mixing between eastern and western stocks.

CITES is not a fishery management tool and does not take the place of proper fishery management. In lieu of CITES, working to implement some of the Performance Review Reports recommendations now for Bluefin will also benefit other species under ICCAT management. The report mentions that objectives are met for only four of the fourteen species it manages.

I think Fish & Wildlife and NMFS HMS should do two things.

- 1) Fish & Wildlife and NMFS should encourage the United States and other ICCAT compliant members to empower ICCAT with independently imposed trade sanctions that leverage seafood markets against non-compliant CPC's and non ICCAT members.
- 2) NMFS HMS should persuade its International arm to insist ICCAT permit international trade of Bluefin as the reward for compliance to ICCAT rules and vise versa. ICCAT could develop an export certificate provided to compliant members.

Fish & Wildlife and NMFS efforts would be rewarded ten fold; by stopping what may be a vicious cycle of cascading CITES listing for other HMS species managed at ICCAT. Fix ICCAT once and avoid revisiting this situation over and over for other fishes.

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