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Mr. Guillermo Morán
IATTC Chair & Ministerio de Agricultura, Ganadería, Acuacultura y Pesca
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29 November 2016

Dear Ms. Moss-Christian and Mr. Morán:

Pacific bluefin tuna (PBF) have the unfortunate distinction of being the world's most depleted tuna population in history, and the species now faces a serious threat of extinction.ⁱ Decades of overfishing have decimated the stock, pushing it down to just 2.6% of its unfished level.ⁱⁱ Despite the clear scientific evidence that the species is in a dire situation, both domestic and international fisheries managers are failing to protect Pacific bluefin tuna. **We, the undersigned 58 scientists, call for a moratorium on commercial Pacific bluefin fishing until the Western and Central Pacific Fisheries Commission (WCPFC) and Inter-American Tropical Tuna Commission (IATTC) improve their management of the species by ending overfishing and adopting a basin-wide rebuilding plan with a science-based, precautionary rebuilding target and deadline.**

We join a growing number of experts who have recognized the serious situation that PBF is in due to a lack of effective management. In June 2016, an independent performance review of IATTC stated: "By any measure, this stock is in serious trouble...Pacific Bluefin has been fished to a very low level and needs urgent joint WCPFC and IATTC management action."ⁱⁱⁱ Fourteen organizations recently submitted a petition to the U.S. government to list the Pacific bluefin tuna as endangered under the Endangered Species Act, citing its severely overfished state, continuing overfishing, and the very real risk of extinction. The U.S. government has determined that listing may be warranted and is now conducting a full status review of the species. In Japan, a group of artisanal fishermen who target PBF have voluntarily suspended fishing during the summer spawning season^{iv}. Unfortunately, other governments have not followed these leads. WCPFC took no additional action at its 2015 meeting, and IATTC took no additional action at its 2016 meetings, despite the known crisis facing PBT.

Until very recently, there was no international management of this highly migratory stock whose migrations of thousands of miles take it through the waters of many fishing nations. In 2014, WCPFC adopted a rebuilding target of the "historical" median biomass. However, because the stock had been overfished for almost the entire period they defined as "historical," the target equates to just 6.4% of the unfished level.^v This is well below the commonly recommended rebuilding target of 20%-40% of unfished levels and is utterly inadequate to return the population to healthy levels.^{vi} As part of this insufficient rebuilding plan, WCPFC adopted a 50% reduction in the catch limits for small PBF; however,

loopholes in the measure allowed several countries to *increase* their catch.^{vii} Furthermore, neither Commission has adopted target or limit reference points.

The lack of effective management measures means that high levels of fishing continue to put pressure on the severely depleted population, with fishing rates up to three times higher than sustainable levels.^{viii} Nearly 98% of Pacific-wide catch is composed of juveniles that have not yet reproduced, a blatant case of growth overfishing.^{ix} At the other end of the lifecycle, adults are targeted by an industrial purse seine fleet when they are aggregated on the spawning grounds, an ill-advised practice that reduces reproductive success by disturbing spawning and selectively removing large spawning adults, leading to reduced maximum yield and loss of genetic diversity.^x

Adding to the management failures, there continues to be a lack of transparency in the scientific process that is out of step with standard practices in international fisheries science. The first publically available stock assessment report was not released by the overseeing scientific body, the International Scientific Committee for Tuna and Tuna-Like Species in the North Pacific Ocean (ISC), until 2012. The ISC still does not allow independent observers to attend or participate in their stock assessment meetings, and non-government scientists must be invited in order to attend, where their participation is severely limited. Meeting reports can take six months or longer to be approved and released to the public, often delaying needed action.

As scientists who are concerned about the dire state of the Pacific bluefin population, we urge PBF fishing nations to immediately implement a moratorium on commercial PBF fishing until appropriate, science-based management measures and a basin-wide rebuilding plan with an appropriately precautionary target are in place. We also call for full transparency in the scientific process, including opening ISC working group meetings to observers and making meeting documents publicly available in a timely fashion. Decisive action is now critical.

Sincerely,

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*** Individuals have signed in their personal capacity and do not necessarily reflect their affiliation's viewpoints.

ⁱ IUCN Red List of Threatened Species. <http://www.iucnredlist.org/details/170341/0>

ⁱⁱ ISC PBFWG. 2016. 2016 Pacific bluefin tuna stock assessment, Draft Executive Summary. [http://www.iattc.org/Meetings/Meetings2016/SAC7/PDFfiles/INF/SAC-07-INF-C\(a\)-ISC-Letter-IATTC-Executive-Summary.pdf](http://www.iattc.org/Meetings/Meetings2016/SAC7/PDFfiles/INF/SAC-07-INF-C(a)-ISC-Letter-IATTC-Executive-Summary.pdf).

ⁱⁱⁱ Moss Adams LLP. 2016. Inter-American Tropical Tuna Commission and Agreement on the International Dolphin Conservation Program Performance Review. <http://www.iattc.org/Meetings/Meetings2016/June/pdf-files/IATTC-AIDCP-Performance-Review-Final-ReportENG.pdf>.

^{iv} Bird, Winifred. 2016. In Japan, a David vs Goliath Battle to Preserve Bluefin Tuna http://e360.yale.edu/feature/in_japan_a_david_vs_goliath_battle_to_preserve_bluefin_tuna/2950/

^v ISC PBFWG. 2016. 2016 Pacific bluefin tuna stock assessment, Draft Executive Summary. [http://www.iattc.org/Meetings/Meetings2016/SAC7/PDFfiles/INF/SAC-07-INF-C\(a\)-ISC-Letter-IATTC-Executive-Summary.pdf](http://www.iattc.org/Meetings/Meetings2016/SAC7/PDFfiles/INF/SAC-07-INF-C(a)-ISC-Letter-IATTC-Executive-Summary.pdf).

^{vi} Restrepo, V. R., Thompson, G. G., Mace, P.M., Gabriel, W. L., Low, L. L., MacCall, A. D., Methot, R. D., Powers, J. E., Taylor, B. L., Wade, P. R., and Witzig, J. F. 1998. Technical guidance on the use of precautionary approaches to implementing National

Standard 1 of the Magnuson– Stevens Fishery Conservation and Management Act. National Oceanic and Atmospheric Administration (US) Technical Memorandum NMFS-F/SPO-31. 54 pp.

^{vii} Sanada Y. 2015. A repeated story of the tragedy of the commons: a short survey on the Pacific bluefin tuna fisheries and farming in Japan. 160 pp.

^{viii} Fishing mortality in 2011 through 2013 was estimated to be 294% of the $F_{40\%}$ level. ISC PBFWG. 2016. 2016 Pacific bluefin tuna stock assessment, Draft Executive Summary. [http://www.iattc.org/Meetings/Meetings2016/SAC7/PDFfiles/INF/SAC-07-INF-C\(a\)-ISC-Letter-IATTC-Executive-Summary.pdf](http://www.iattc.org/Meetings/Meetings2016/SAC7/PDFfiles/INF/SAC-07-INF-C(a)-ISC-Letter-IATTC-Executive-Summary.pdf).

^{ix} ISC PBFWG. 2014. Stock assessment of bluefin tuna in the Pacific Ocean in 2014. http://isc.fra.go.jp/pdf/2014_Intercessional/Annex4_Pacific%20Bluefin%20Assmt%20Report%202014-%20June1-Final-Posting.pdf.

^x Van Overzee HMJ, AD Rijnsdorp. 2015. Effects of fishing during the spawning period: implications for sustainable management. *Reviews in Fish Biology and Fisheries* 25:65-83.