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October 8, 2010

VIA FIRST CLASS MAIL

Attn: Natalie Webster
AMERICAN ALBACORE FISHING ASSOCIATION
4252 Bonita Road, #154
Bonita, CA 91902

Re.: Meetings of the PFMC and HMS-MT & HMS-AS -- September 2010

Dear Natalie and all AAFA members:

I recently travelled to Boise, Idaho to participate in the meetings of the Highly Migratory Species (HMS) Management Team (MT) and Advisory Subpanel (AS). These two groups met in advance of the Pacific Fishery Management Council (PFMC) meetings.

ALBACORE DEVELOPMENTS

The WCPFC¹ Northern Committee met in Japan shortly before these meetings and a summary of those meetings was quickly prepared by Council staff. It appears there is a "difference of opinion" between the U.S. and Japan with respect to how tuna stocks should be managed. The U.S. State Department has been pushing for management based on Maximum Sustained Yield (MSY), while Japan favors looking at observed stock conditions, such as the minimum observed biomass.

Turning its attention to North Pacific albacore, the Northern Committee discussed the current interim (temporary) reference point that is being used. That reference point is the fishing mortality rate (F) that prevents the spawning stock biomass (SSB) from going lower than the average of the 10 lowest historical values for SSB.

To help you get an idea of what this might look like, I have included a table showing the past 40 years of albacore spawning stock biomass. I have added a couple of lines to show what the 10 lowest SSB values might be, and what the average of those values might look like.

It is interesting to note how the SSB history demonstrates not only how quickly the albacore stock can go down, but also note how quickly the stock can recover.

¹ Western and Central Pacific Fisheries Commission

AMERICAN ALBACORE FISHING ASSOCIATION

Re.: Meetings of the PFMC and HMS-MT & HMS-AS -- September 2010

(Continued)

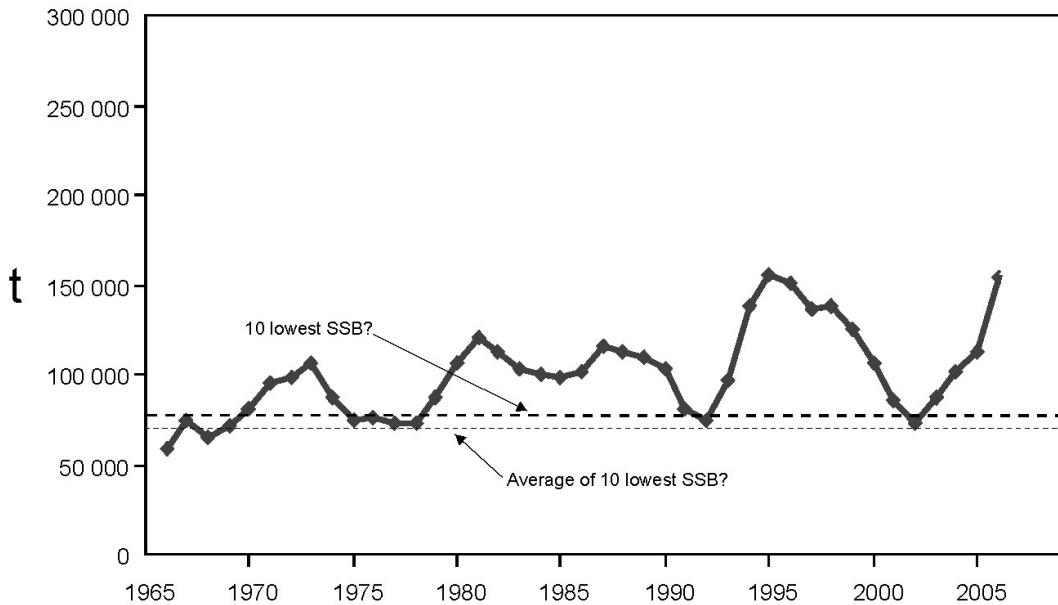


FIGURE F-2. Spawning stock biomass of North Pacific albacore tuna, from the North Pacific Albacore Workshop analysis of 2006.

The last albacore stock assessment indicated the SSB was at, or near, a record high level. However, fishery scientists are concerned that the fishery mortality (F) is also at a very high level and may cause the SSB to decline.

The last assessment for albacore was performed in 2006. At that time, the International Scientific Committee recommended that “*current effort*” on fishing albacore should not be increased. Since there has been no new assessment, the ISC has provided no new guidance. However, the ISC has refined its definition of “*current effort*” to mean F at 2002-2004 levels.

The next assessment for the North Pacific albacore stock will be done in 2011 and many organizations are awaiting its release before taking further action.

ALBACORE FISHERY REQUESTS FUNDING

The Advisory Subpanel did urge to Council to act with respect to one albacore issue. The Subpanel asked the Council to remind NMFS to provide funds for albacore research. These funds would most likely be given to AFRF to assist in its operations. West Coast processor and albacore fishing representatives on the Subpanel were big supporters of this funding request.

I suggested the Subpanel request NMFS make efforts to get in touch with South Pacific tuna researchers. A recent report on South Pacific tuna tagging efforts announced a tag recapture rate of over 15%, from over a quarter-million fish tagged over 3 years. The tag recovery rate for AFRF efforts in the North Pacific have not been anywhere near as successful.

RECOMMENDATIONS ON INTERNATIONAL ALBACORE MANAGEMENT

The Advisory Subpanel briefly discussed these developments (*above*) and decided to follow the views put forth by West Coast processor interests on the Subpanel. Namely, to recommend to the Council that nothing be done with respect to albacore management, at least not until after the next stock assessment was issued.

I asked the Subpanel to consider requesting the Council to urge the U.S. to take a more aggressive leadership role at the international management level, particularly with respect to the upcoming IATTC meetings. I expressed concern that if the U.S. was too submissive at these meetings, then the U.S. albacore fishery could get stuck with measures developed and proposed by other nations. Measures that best favored and protected their fishing fleets, and might not be as kind to our fishing fleet.

The Subpanel members were not interested in making such recommendations and decided instead to report to the Council that they did *“not foresee any albacore management issues addressed this year at the IATTC session.”*

Interestingly, the HMS Management Team (MT) took a more proactive stance with respect to albacore. The MT suggested the Council recommend the U.S. delegation:

1. Convene a working group to discuss albacore issues and “current effort”;
2. Consider having the working group focus on developing a framework for albacore management (in anticipation of the 2011 assessment); and
3. Work to ensure there is adequate opportunity for the Council to have input.

I expressed support for holding discussions regarding the type of management framework that would be preferable for the U.S. fishery. Processor and albacore vessel owner representatives did not want to have any management discussions and would not provide the Council with any specific recommendations for the U.S. delegation.

It was noted that Canada has already put together a framework for albacore fishery management and has proposed it to the IATTC for consideration. I indicated that our U.S. representatives should have a proposal that the U.S. albacore fleet helped develop, and that would require discussion of the issues. Despite the logic of this view, the Advisory Subpanel members made it clear they do not want to discuss the issues.

While the Advisory Subpanel did not agree with the Management Team and AAFA’s views on most of the issues, the Subpanel did agree with one of AAFA’s recommendations. They supported AAFA’s suggestion that the Council remind the U.S. delegation that other nations need to improve their compliance with fishery data reporting as required by the IATTC Resolution.

At the full Council meeting, the Council recommended the U.S. participate in development of a definition of “current effort” as specified in the albacore resolution. The Council also recommended the U.S. not propose or endorse any changes to international management of albacore until the stock assessment is completed next year.

AMERICAN ALBACORE FISHING ASSOCIATION

Re.: Meetings of the PFMC and HMS-MT & HMS-AS -- September 2010

(Continued)

WASHINGTON ALBACORE RECREATIONAL BAG LIMIT

The Washington Department of Fish and Wildlife came before the Council with a proposal to establish a recreational bag limit for albacore. There is concern because of significant increase in fishing effort by the recreational fleet in recent years.

Currently, Washington's recreational albacore fishery is the one fishery that does not have any bag limits. The WDFW does not believe that a recreational bag limit would contribute to a significant reduction in the West Coast albacore catch. Instead, the Washington State Legislature has defined recreational fishing as a "personal use" fishery.

WDFW requests the Council establish a bag limit for recreational fishing that accurately reflects personal use. Bag limits of 10, 15, 20, and 25 albacore per fishing trip were proposed for public review.

The proposed bag limit is being considered as an aspect of a sportfishing ethic. The overall reception of this proposal by the Advisory Subpanel was somewhere between cool and indifferent.

At the full Council meeting, the Council considered the Washington DFW request for a recreational bag limit on albacore. The Council voted to adopt a range of alternatives for public review. The alternatives would include: no action, or bag limits of 10, 15, 20 or 25 albacore on a per-trip basis for the Washington recreational fishery.

SHALLOW-SET LONGLINE FISHERY

The Council received a request to establish a shallow set longline fishery west of the U.S. EEZ and east of the 150 degree West longitude line. This is being proposed as a high seas swordfish fishery. It would create an open-access longline fishery outside the EEZ.

Currently, Hawaiian longline vessels can fish on the high seas all the way to West Coast EEZ. They can deliver their catch on the West Coast, and then fish on the high seas all the way back to Hawaii.

The HMS MT and AS held a joint meeting to discuss the longline proposal. An attorney from NMFS attended the meeting to speak on legal issues.

It was recognized that allowing an open-access shallow-set longline fishery would be difficult to achieve from a political perspective. Past efforts have met with significant opposition.

This fishery has been repeatedly and extensively considered by the Council in recent years, and was voted down by the Council just last year.

Hawaii has a limited entry longline fishery. Last year, the Council rejected a proposal to open a limited entry fishery on the West Coast. Now, the Council is being asked to allow an open-access longline fishery.

One of the issues that has never properly been addressed is the fact that North Pacific albacore are anticipated to account for a significant portion of the longline fishery's

AMERICAN ALBACORE FISHING ASSOCIATION

Re.: Meetings of the PFMC and HMS-MT & HMS-AS -- September 2010

(Continued)

marketable bycatch. And how will the creation of an open access longline fishery effect U.S. compliance with international resolutions on albacore?

Another issue that was not addressed was the question of observer coverage. The proposed open-access longline fishery would likely require full-time observer coverage. Observer resources are already strained by current fisheries, and there are no provisions for increasing those resources.

There is also a question of whether vessels in the longline fishery would have to surrender their drift gillnet (DGN) permits. This had been considered as part of an earlier proposal, but it is not clear if it will be included in this proposal. Processors and fishermen spoke about a decline in the swordfish DGN fleet and how processors need access to a reliable supply of fish.

Recreational fishing representatives were not opposed to a limited entry longline fishery, but did not believe they could support an open-access longline fishery.

Despite these issues and the potential for significant negative impacts on the albacore fleet, the members of the Advisory Subpanel expressed strong support and recommended the Council establish an open access shallow-set longline fishery.

At the meeting of the full Council, the Council proposed a regulatory change to make West Coast regulations consistent with a regulatory change currently proposed by the Western Pacific Management Council. This change would apply to the existing deep-set tuna longline fleet and relates to the allowed retention of swordfish that are caught incidentally.

Current regulations allow 10 swordfish to be retained as bycatch. The proposed regulation would increase that number to 25 swordfish if no observer is onboard. If a vessel is carrying an observer, there would be no limit on the number of swordfish that could be kept. This proposed change will be put up for public review and decided at a future meeting.

IUU FISHING & ENFORCEMENT

IUU fishing (illegal, unreported and unregulated) is a serious problem for effective fishery management, and one that has plagued the Pacific albacore fisheries for years. AAFA vessels have been proactive in reporting IUU activity and AAFA has repeatedly urged the Council to take steps to increase enforcement.

At this meeting, Council Member William "Buzz" Brizendine raised the important issue of IUU fishing and asked how NMFS and the U.S. Coast Guard were addressing it. U.S. Coast Guard Lieutenant Commander Chambers responded to the Council and reported on a recent Coast Guard effort.

In response to a number of reports from U.S. albacore vessels on the high seas, the Coast Guard launched a C-130 aircraft from Kodiak, Alaska to investigate the reports. The USCG plane had difficulty establishing communications with vessels in the area and believed this hampered their ability to search effectively.

AMERICAN ALBACORE FISHING ASSOCIATION

Re.: Meetings of the PFMC and HMS-MT & HMS-AS -- September 2010

(Continued)

After considerable surveillance produced no signs of IUU vessels, the Coast Guard C-130 returned to Kodiak. The Coast Guard and NMFS representatives stressed that these enforcement activities were very expensive and that effective enforcement required all the information and cooperation they can get.

Council Member Brizendine thanked the USCG for their enforcement response and emphasized that IUU fishing is a serious issue and needs to be addressed if management is to be successful.

If you have any questions or would like to have further discussions on these matters, please do not hesitate to contact me. Thank you.

Yours truly,

Chip Bissell