

August 5, 2019

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Mr. Chris Oliver  
Assistant Administrator for Fisheries  
National Marine Fisheries Service  
1315 East-West Highway  
Silver Spring, MD 20910-3282  
Via email: CHRIS.OLIVER@NOAA.GOV

Dear Mr. Oliver:

Under the Authority of the Atlantic Tunas Convention Act (ACTA), the New England, Mid-Atlantic, South Atlantic, Caribbean, and Gulf of Mexico Fishery Management Councils are represented on the Advisory Committee to the U.S. International Commission for the Conservation of Atlantic Tunas (ICCAT) Delegation of Commissioners. Bigeye Tuna and Yellowfin Tuna are of significant importance to commercial and recreational fisheries along the U.S. East Coast and Gulf of Mexico. The Caribbean, New England, Mid-Atlantic, South Atlantic, and Gulf of Mexico Fishery Management Councils urge the U.S. Section to ICCAT to pursue meaningful conservation and management recommendations for these species.

The most recent stock assessment completed by ICCAT's Standing Committee on Research and Statistics (SCRS) indicated the Bigeye Tuna (BET) stock is overfished and undergoing overfishing. Yellowfin Tuna (YFT) is also overfished and although overfishing is not thought to be occurring at the implemented total allowable catch (TAC) of 110,000 mt, the fishery exceeded that TAC nearly every year since 2012. The SCRS expressed strong concern that 2015-2017 catches have exceeded the TAC and it is possible the stock is now subject to overfishing. The status of these two stocks requires strong action by ICCAT to prevent further stock declines and promote rebuilding.

The Bigeye, Albacore, Yellowfin, and Skipjack (BAYS) Tuna Species Working Group was established to provide advice and recommendations to the U.S. ICCAT Commissioners. The BAYS working group met on April 15, 2019 to develop recommendations regarding ICCAT's conservation, management, research, and data collection efforts for BAYS species/stocks. The New England, Mid Atlantic, South Atlantic, Caribbean, and Gulf of Mexico Fishery Management Councils jointly support the following conservation and management recommendations developed by the working group.

### **Conservation and Management Recommendations**

1. The United States should provide leadership, including consideration of submitting a proposal, to Panel 1 in its efforts to revise Rec. 16-01 to implement a new management system for bigeye and yellowfin tuna that includes an enforceable TAC coupled with enhanced management of the purse seine fisheries that provides a high likelihood (e.g., 70%) of recovering the stocks within ten years and/or maintaining the stocks in the green zone.

2. The United States should seek to advance quota allocation negotiations for both bigeye and yellowfin tuna that includes all major harvesters, sufficiently limits Contracting Parties and Cooperating non-Contracting Parties, Entities or Fishing Entities with purse seine interests and minor harvesters and suspends new entrants into fisheries for overfished stocks until such time as the stock recovers. For yellowfin allocation discussions, any small harvester exception considered should be de minimis.
3. The United States must pursue measures that limit Bigeye and Yellowfin catch on fish aggregating devices (FADs), including lowering FAD deployment limits in conjunction with unique FAD identifiers, and in particular, a Convention area-wide FAD closure for a sufficiently long period of time (e.g., three to four months) to meaningfully reduce juvenile catches.
4. The United States should seek enhanced observer coverage requirements for vessels in the tropical tuna fishery, including a regional observer program and 100% observer coverage on purse seine and as a priority on supply vessels. Pelagic long-line coverage should be consistent with current U.S. practice. Electronic monitoring may be appropriate for achieving some level of coverage, particularly in the pelagic long-line fleet.
5. The United States should consider advocating for an eastern Atlantic skipjack TAC based on 2018 catches until the 2020 stock assessment can be reviewed.

The successful management of these tuna species is of critical importance to our fishermen. The United States should take a strong leadership role in rebuilding these stocks. We look forward to continued participation through the IAC as the U.S. ICCAT delegation prepares for the 2019 ICCAT meeting.

Sincerely,



Dr. John Quinn  
NEFMC Chair



Mike Luisi  
MAFMC Chair



Marcos Hanke  
CFMC Chair



Dr. Thomas K. Frazer  
GMFMC Chair



Jessica R. McCawley  
SAFMC Chair

cc: US ICCAT Commissioners:  
Andrew Lawler, Federal  
Raymond D. Bogan, Recreational  
Eugenio Piñeiro Soler, Commercial