



Mr. Guillermo A Compeán
Director
Inter-American Tropical Tuna Commission
8901 La Jolla Shores Drive
La Jolla CA 92037-1509, USA

August 3rd 2020

Dear Mr Compeán

I am writing on behalf of the partners of the [Global Tuna Alliance](#) and [Tuna Protection Alliance](#), two precompetitive collaborations of companies with a major interest in improving the sustainability of the tuna sector. Together, these two groups represent a significant proportion of the north west European market.

I would be extremely grateful if you are able to circulate to all IATTC members.

It is clear that the impacts of COVID-19 have presented challenges to regional fisheries management organizations (RFMOs) in conducting meetings and addressing important conservation and management issues in 2020. We do not believe current circumstances should prevent the Inter-American Tropical Tuna Commission (IATTC) from taking action to ensure the uninterrupted sustainable management of the tuna stocks and marine ecosystems under its purview. We do recognize that the Commission may need to hone the focus of its work in 2020 for practical reasons due to present circumstances. In particular, there are several critical measures and issues that require immediate attention by IATTC this year.

Tropical Tunas

We strongly urge members to push the IATTC to take action to ensure that IATTC's tropical tuna conservation measures - C -17-02 and C-17-01 - do not lapse and that conservation and management measures stay in place to limit fishing pressure on yellowfin and bigeye tunas.

Observer Coverage

In addition, we urge members to ensure that short-term measures to suspend some observer coverage requirements are reinstated as soon as practical. Further, we believe current circumstances reinforce the need for accelerating the development and implementation of electronic monitoring tools and strategies to strengthen critical oversight in tuna fisheries. Specifically, the Commission should review the Scientific Staff's report on electronic monitoring at the Scientific Advisory Committee Meeting; and direct the Scientific Staff to draft a workplan and timeline for implementation of a comprehensive electronic monitoring program.

Harvest Strategies

IATTC needs to accelerate action on comprehensive, precautionary harvest strategies to be implemented simultaneously with the development of precautionary reference points and harvest control rules.

Adhering to best practices of modern fisheries management, consistent with the United Nations Fish Stocks Agreement and the Food and Agricultural Organization Code of Conduct for Responsible Fisheries, harvest strategies are an essential component of the Global Sustainable Seafood Initiative's (GSSI) benchmarking tool. Responsible members of the supply chain, including GTA and TUPA Partners, are continually increasing their sourcing from tuna fisheries certified by schemes that are

internationally recognized by the GSSI. Accordingly, sourcing may be impacted should harvest strategies not be implemented.

Reforming the Regulations of at-sea Transshipment

At-sea transshipment of catch between vessels plays a large and important role in the global commercial fishing industry.

There is not enough independent data, appropriately and timely shared, nor are other regulations up to date, to allow for effective monitoring and compliance. These gaps create risks for labour and human rights abuses, can reduce observer safety, and create opportunities for IUU fishing activities, fraud, and catch laundering. Insufficient monitoring can also undermine traceability, the provision of required data collection, and effective implementation of bycatch mitigation measures.

As well as adopting 100% observer coverage requirement (human and/or electronic) on all vessels engaged in at sea transshipment, by 2024, IATTC should adopt amendments to existing transshipment regulations to bring in line with [best practices](#).

Develop a Comprehensive FAD Management Program

The number of FADs used and the number of FAD sets in the Eastern Pacific has grown in recent years. Fleets that were not previously using them are now increasingly fishing on FADs — either on those they encounter by chance, or by deploying FADs themselves. This situation has raised concerns because all stock status indicators for bigeye tuna (except catch) are at or near their respective reference levels that indicate high exploitation rates.

In 2019, the IATTC could not agree to even slight progress on FAD management; despite the IATTC scientific staff recommending reducing the active FAD limit by 30%.

We call upon IATTC to adopt the measures identified in the Global NGO Tuna Forum's [position](#) on better FAD Management. While not comprehensive, these measures are critical to ensuring that at-sea FAD fishing is better-managed and more transparent.

As organizations engaged in the sourcing of tunas globally, we urge you to fully support the inclusion of these issues on IATTC meeting agendas in 2020 and that your public positions will testify to your support for addressing these issues.

Thank you for your attention in this matter.

Yours Sincerely,



Dr Tom Pickerell
Executive Director
Global Tuna Alliance



Jeanne Delor
Project Officer
Earthworm Foundation

