



14th July 2021

Dear IATTC Delegate,

I am writing on behalf of the Global Tuna Alliance; a collaboration of retailers, wholesalers, suppliers and processors of tuna who are concerned about the sustainability of tuna. Collectively we bought 1.27m tonnes of tuna, worth over USD \$1.3bn, in 2020.

While 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 and 2021, The Global Tuna Alliance does not believe current circumstances should prevent the IATTC from taking action to ensure the uninterrupted sustainable management of the tuna stocks and marine ecosystems under its purview.

Our members have made public commitments to sourcing seafood, including tuna from the Eastern Pacific Ocean, responsibly. As one of the decision-makers of these fisheries, we are calling on you to take the following actions and show leadership. We need your support to improve the sustainability of these fisheries.

#### **Harvest Strategies**

Accelerate the development of precautionary harvest strategies for tropical tunas by establishing a Management Strategy Evaluations workshop as required by Resolution C-19-07. Prioritize and secure funding to complete the implementation of the management strategy evaluation workplan by 2023.

#### **Tropical Tuna Conservation Management Measure**

Adopt a multiannual conservation and management measure for yellowfin and bigeye tunas that is precautionary and based on scientific advice, which effectively limits fishing pressure and includes additional measures to monitor and manage the use of FADs.

#### **Port State Measures Agreement (PSMA)**

Adopt a Port State Measure that is fully aligned with the PSMA by 2022.

#### **FAD Management Best Practices**

The IATTC should adopt the measures identified in the GTA'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.

#### **Fishery Observer Coverage/ Electronic Monitoring**

The potential impacts of relaxation of observer coverage requirements are of major concern to us. Given that this situation may continue for some considerable, and as yet undefined, period of time, we strongly request to ensure that the short-term measures to suspend 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. We call on the IATTC to develop minimum standards for an electronic monitoring program in 2021 to be adopted in 2022.

#### **Fishery Observer Safety**

Increasing instances of fisheries observer deaths, as well as violations of fishing crew welfare, have been reported to authorities and NGOs in recent years. We are disturbed by this trend and take these

reports very seriously. We call on the IATTC to implement the International Observer Bill of Rights (IBOR) and adopt the WCPFC mandatory observer safety reforms.

### **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.

However, 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 industrial tuna vessels, by 2024, IATTC should adopt amendments to existing transshipment regulations to bring in line with [best practices](#).

### **Biodiversity Beyond National Jurisdictions (BBNJ)**

We urge the IATTC to actively participate in the upcoming rounds of BBNJ treaty negotiations to ensure the complementarity of their strategies with the area-based management tool (ABMT) and environmental impact assessment (EIA) ambitions of the BBNJ treaty.

We look to all tuna RFMOs to implement integrated, ecosystem-based management (IOM/EBM) to replace reliance on single sector management in isolated silos and the limited focus on the impacts on non-target, associated or dependent species.

We are seeking to ensure that your government is fully behind the drive for sustainable tuna fisheries and that your position on these issues at the IATTC meeting in August will testify to that commitment.

Thank you for your attention in this matter.

Yours sincerely

Dr Tom Pickerell  
Executive Director, Global Tuna Alliance