

Surveillance Report 4
American Albacore Fishing Association (AAFA) –
North Pacific Albacore Pole & Line and Troll/Jig Fishery

Certificate No.: MML-FC-014

Intertek Moody Marine Ltd.
November 2011

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1.0 GENERAL INFORMATION

Scope against which the surveillance is undertaken: MSC Principles and Criteria for Sustainable Fishing as applied to the AAFA Pacific Albacore Pole & Line and Troll/Jig Fishery.

Species: Albacore tuna (*Thunnus alalunga*)

Area: North Pacific

Method of capture: Pole & Line and Troll/Jig

Date of Surveillance Visit:	26th – 28th October 2011			
Initial Certification	Date: 24th August 2007		Certificate Ref: MML-FC-014	
Surveillance stage	1st	2nd	3rd	4th
Surveillance team:	Lead Assessor: Rob Blyth-Skyrme Assessor(s): Norman Bartoo Mike Laurs			
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2.0 INTRODUCTION

This report contains the findings of the fourth surveillance audit in relation to the American Albacore Fishing Association (AAFA) North Pacific Albacore Pole & Line and Troll/Jig Fishery, and covers the 12 months up to September 2011. The surveillance audit was carried out in accordance with the Marine Stewardship Council (MSC) Fisheries Certification Methodology (FCM) Version 6.

This fourth surveillance audit was undertaken following a variation request to the MSC for a delay to the audit schedule, based on the availability of NMFS scientists to input to the audit process. Confirmation from the MSC that the audit could be delayed was posted to the MSC website on the 19th July 2011. An announcement of the surveillance audit was then published on the MSC website on the 16th September 2011 (See Appendix A) and opportunity was provided to stakeholders to meet with or submit information on the fishery to the assessment team. Stakeholders who have previously commented on the certification of this AAFA fishery were also notified directly of the fourth surveillance audit.

The World Wildlife Fund (WWF) submitted written comments to the assessment team, included as Appendix B, that were principally related to the reassessment of the AAFA North and South Pacific albacore fisheries. The comments were also considered by the assessment team conducting this fourth surveillance, however.

It is noted that the site visit for this fourth surveillance audit was combined with the reassessment site visit.

During the site visit, the surveillance team met with the client and with staff from the National Marine Fisheries Service (NMFS) Fisheries Resources Division, and teleconferenced with a member of staff from the NMFS Southwest Fisheries Science Center. A conference call was also held with a council member of the Pacific Fisheries Management Council, who is also a member of the US delegation to the Western and Central Pacific Fisheries Commission. During these discussions, evidence was gathered on the status of the stock, the performance of the fishery throughout the year, changes to management of the fishery, and AAFA's involvement in management fora. A number of scientific and meeting reports were also examined by the surveillance team in producing this report, as detailed in the information sources section.

3.0 RESULTS, CONCLUSIONS AND RECOMMENDATIONS

The following section provides a tabulated format within which general information about the status of the stock and the fishery for this reporting period is provided along with the surveillance team's observations, conclusions and recommendations on the current status of the fishery.

With respect to the final Condition of Certification, which was closed out in the second surveillance audit, the following table sets out the original assessment scoring guideposts and scoring commentary, and the requirements of the Condition, alongside the heading 'Activity assessed'. This identifies the areas in which the fishery was previously determined to have been performing below the level required by the MSC standard during the initial assessment, and the required actions to address these issues. Although the AAFA satisfied the requirements of the Condition by the second annual audit, the assessment team concluded in that audit report that:

“There is also an expectation from the audit team that AAFA continue to work to advocate appropriate, sustainable management of the fishery. As such, the Condition may be reintroduced

in future if an annual audit team is not satisfied that AAFA is performing adequately with regard to the intent of this Condition.”

As such, for this fourth audit, the assessment team carefully reviewed the work undertaken by the client during the last year against the Action Plan, as specified by AAFA, setting out the stages involved in addressing the Conditions raised. This is set out in the table alongside the heading ‘AAFA Action’. It should be noted that this Action Plan was deemed to be adequate by the original main assessment team.

According to the terms of the Action Plan, the client again provided information on the work undertaken to date in time for this fourth surveillance audit.

This progress has been evaluated by the Intertek Moody Marine surveillance team (‘Observations’ and ‘Conclusion’) against:

1. The commitments made in the Action Plan;
2. The intent of the original Condition; and,
3. The original scoring indicator, guideposts and commentary.

The influence of any overall legislative and management changes in the fishery are also taken into consideration.

Item	Comments
1	Stock status
Observations	<p data-bbox="416 262 710 293">North Pacific Albacore</p> <p data-bbox="416 293 1439 1099">The current assessment of the status and future trends in the north Pacific albacore tuna (<i>Thunnus alalunga</i>) stock was completed in June 2011 using fishery data through 2009 and was reviewed by the International Scientific Committee for tuna and tuna-like species in the North Pacific Ocean (ISC) in June, 2011 (WCPFC-NC7_2011/IP-02). The assessment was conducted using the Stock Synthesis modeling platform (SS3, Version 3.11b) and is based on the assumption that there is a single well-mixed stock of albacore in the North Pacific Ocean. The new model used was a seasonal, length-based, age-structured, forward-simulation population model with a focus on providing reliable estimates of population dynamics and stock abundance. Major changes to model inputs and structure in this assessment relative to the 2006 assessment include the use of catch-at-length data rather than catch-at-age data. The results derived were similar to those derived from the previous assessment in 2006 and were slightly more optimistic with regard to spawning stock biomass. The SS3 model and the VPA model used in previous assessments were on the current data and both estimated similar historical trends in SSB and recruitment, but with different scaling for biomass. The assessment stated that the scaling difference is largely attributable to the different growth curves used in the SS3 model and the VPA reference run. The Albacore Working Group of the ISC (ALBWG) concluded that the growth curve used in the 2006 assessment is not representative of growth in north Pacific albacore. Based on the agreement in trends of estimated quantities between the VPA and SS3 base-case model, the ability to explain the scaling differences between models, and the robustness of the stock status and conservation advice to these differences, the WG concluded that the SS3 model will replace the VPA as the principal model for North Pacific albacore assessments.</p> <p data-bbox="416 1137 1439 1435">The Northern Committee (NC) of the Western and Central Pacific Fisheries Commission (WCPFC) established an interim management objective for North Pacific albacore in 2008. The objective is to maintain the spawning stock biomass (SSB) above the average of the ten historically lowest estimated points (ATHL) with a probability greater than 50%. The NC requested that the ALBWG evaluate the status of the North Pacific albacore stock against $F_{SSB-ATHL\ 50\%}$ for a 25-yr projection period. $F_{SSB-ATHL\ 50\%}$ is the fishing mortality, F, that will lead to future minimum SSB falling below the SSB-ATHL threshold level at least once during the projection period (2010-2035).</p> <p data-bbox="416 1473 1439 1839">The assessment model estimates that SSB has likely fluctuated between 300,000 and 500,000 t between 1966 and 2009 and that recruitment has averaged 48 million fish annually during this period. The pattern of F-at-age shows fishing mortality increasing to its highest level on 3-yr old fish and then declining to a much lower and stable level in mature fish. Current F (geometric mean of 2006 to 2008, $F_{2006-2008}$) is lower than $F_{2002-2004}$ (current F in the 2006 assessment). Future SSB is expected to fluctuate around the historical median SSB (~405,000 t) assuming F remains constant at $F_{2006-2008}$ and average historical recruitment levels persist. $F_{2006-2008}$ is approximately 30% below $F_{SSB-ATHL50\%}$ and there is about a 1 % risk that future SSB will fall below the SSB-ATHL threshold in at least one year in the projection period, i.e., current F is well below the 50% probability level.</p> <p data-bbox="416 1877 1439 2029">The assessment concluded the North Pacific albacore stock is considered to be healthy at current levels of recruitment and fishing mortality. Since current $F_{2006-2008}$ is about 71% of $F_{SSB-ATHL}$ and the stock is expected to fluctuate around the long-term median SSB (~405,000 t) in the foreseeable future given average historical recruitment levels and constant fishing mortality at $F_{2006-2008}$. The conclusion is</p>

that overfishing is not occurring and that the stock likely is not in an overfished condition. However, recruitment is a key driver of the dynamics in this stock and a more pessimistic recruitment scenario increases the probability that the stock will not achieve the management objective of remaining above SSB-ATHL threshold with a probability of 50%. Thus, if future recruitment declines about 25% below average historical recruitment levels due either to environmental changes or other reasons, then the impact of F₂₀₀₆₋₂₀₀₈ on the stock is unlikely to be sustainable. Therefore, the assessment recommends maintaining present management measures.

The F-based reference point $F_{SSB-ATHL}$ is one of a group of simulation-based biological reference points (BRP) using spawning biomass thresholds proposed for North Pacific albacore (ISC/05/ALBWG/06). Unlike other BRPs used in fisheries management, FSSB is not an equilibrium concept and therefore does not assume that future SSB or yield will remain constant at some specified level. As a simulation-based BRP, $F_{SSB-ATHL}$ can incorporate non-equilibrium dynamics, uncertainty in the stock size estimates, and other parameters from the assessment as well as uncertainty in recruitment in future years.

Estimates of $F_{2006-2008}$ (current F) relative to several F-based reference points used in contemporary fisheries management are presented below in Table 1. The estimates are expressed as the ratio of $F_{2006-2008}/F_{ref\ point}$, which means that when the ratio is less than 1.0, $F_{2006-2008}$ is below the reference point estimate. The F_{MAX} , F_{MED} and $F_{0.1}$ reference points are based on yield-per-recruit analysis while the $F_{20-50\%}$ reference points are spawning biomass-based proxies of F_{MSY} . Since $F_{2006-2008}$ is close to F_{MED} and well below the MSY proxy rates, the assessment infers that overfishing of the North Pacific albacore stock is unlikely at present. Therefore, the current fishing mortality is less than, and in some cases much less than, commonly applied F-based reference points.

Table 1: Potential reference points and estimated F-ratio using $F_{current}$ ($F_{2006-2008}$), associated spawning biomass and equilibrium yield. $F_{SSBL-ATHL}$ is not equilibrium concept so SSB and yield are given as median levels. (WCPFC-NC7_2011/IP-02).

Reference Point	$F_{2006-2008}/F_{RP}$	SSB (t)	Equilibrium Yield (t)
$F_{SSB-ATHL}$	0.71	346,382	101,426
F_{MAX}	0.14	11,186	185,913
$F_{0.1}$	0.29	107,130	170,334
F_{MED}	0.99	452,897	94,080
$F_{20\%}$	0.38	171,427	156,922
$F_{30\%}$	0.52	257,140	138,248
$F_{40\%}$	0.68	342,854	119,094
$F_{50\%}$	0.91	428,567	99,643

Management actions in Response to Status

As noted above, the North Pacific albacore stock is considered to be healthy at the average historical recruitment and current fishing mortality ($F_{2006-2008}$). The sustainability of the stock is not threatened by overfishing as current $F_{2006-2008}$ is about 71% of FSSB-ATHL and the stock is expected to fluctuate around the long-term median SSB (~400,000 t) in the short- and long-term future. However, recruitment is a

	<p>key driver of the dynamics in this stock and a more pessimistic recruitment scenario (25% below average historical recruitment) increases the probability that the stock will not achieve the management objective of remaining above SSB-ATHL threshold in the 25-year projection period to 54%. Assuming the impact of $F_{2006-2008}$ on the stock is unlikely to be sustainable with this lower recruitment, the North Pacific Albacore Working Group recommended maintaining the present management measure (no increase in effort beyond “current” levels (2002-2004)).</p> <p>IATTC resolution C-05-02 adopted in 2005 remains in effect, namely that:</p> <ol style="list-style-type: none"> 1. The total level of fishing effort for North Pacific albacore tuna in the Eastern Pacific Ocean not be increased beyond current levels. At the 2008 IATTC meeting it was recommended that the fishing mortality averaged for 2002-2004 be used as the “current” fishing mortality as applies to (1). 2. The CPCs [IATTC parties, cooperating non-party, fishing entity or regional economic integration organization] shall take necessary measures to ensure that the level of fishing effort by their vessels fishing for North Pacific albacore tuna is not increased; 3. All CPCs shall report all catches of North Pacific albacore tuna by gear type to the IATTC every six months. However, since the limit in the resolution is in terms of effort, the six-monthly reports include information on effort as well as catch, in terms of the most relevant measures for a given gear type. The technical aspects of the effort data to be supplied could be established by the IATTC in collaboration with scientists of the interested member countries. <p>Similarly, the WCPFC Conservation and Management Measure (CMM) 2005-03, which is very similar to IATTC C-05-02 also remains in effect.</p>
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2	The Fishery																																																																						
Observations	<p>Figures produced by the Pacific Fisheries Management Council (PFMC) show that in 2010 the total commercial landings of albacore tuna from the States of Washington, Oregon and California were 11,822.6 mt, of which 958 mt was landed by Canadian albacore fishing vessels operating in the US EEZ (Table 2- PFMC 2011).</p> <p>The value of the US catch in 2010 was in the region of \$29.5 million, a slight increase on the 2009 figure of approximately \$27.5 million (Table 2- PFMC 2011). Landings data for the 2011 season are currently incomplete.</p> <p>Table 2: Monthly commercial landings and ex-vessel revenue for albacore by the surface hook-and-line fleet, by state, 2009 - 2010 (PFMC 2011).</p> <table border="1"> <thead> <tr> <th rowspan="2">2009</th> <th colspan="3">California</th> <th colspan="3">Oregon</th> <th colspan="3">Washington</th> </tr> <tr> <th>Month</th> <th>No.</th> <th>mt</th> <th>Revenue \$</th> <th>No.</th> <th>mt</th> <th>Revenue \$</th> <th>No.</th> <th>mt</th> <th>Revenue \$</th> </tr> </thead> <tbody> <tr> <td>Jan-Jul</td> <td>73</td> <td>56.6</td> <td>139,479</td> <td>488</td> <td>1,621.1</td> <td>3,582,994</td> <td>220</td> <td>1,686.9</td> <td>3,615,546</td> </tr> <tr> <td>Aug</td> <td>159</td> <td>133.6</td> <td>324,038</td> <td>677</td> <td>1,917.9</td> <td>4,053,189</td> <td>407</td> <td>2,762.2</td> <td>5,918,893</td> </tr> <tr> <td>Sept</td> <td>135</td> <td>76.0</td> <td>238,675</td> <td>297</td> <td>819.8</td> <td>2,007,621</td> <td>317</td> <td>2,371.5</td> <td>5,622,979</td> </tr> <tr> <td>Oct-Dec</td> <td>57</td> <td>83.2</td> <td>209,947</td> <td>39</td> <td>214.9</td> <td>546,858</td> <td>50</td> <td>519.0</td> <td>1,268,575</td> </tr> <tr> <td>Total</td> <td>424</td> <td>349.4</td> <td>912,139</td> <td>1501</td> <td>4,573.7</td> <td>10,190,662</td> <td>994</td> <td>7,339.6</td> <td>16,425,993</td> </tr> </tbody> </table>	2009	California			Oregon			Washington			Month	No.	mt	Revenue \$	No.	mt	Revenue \$	No.	mt	Revenue \$	Jan-Jul	73	56.6	139,479	488	1,621.1	3,582,994	220	1,686.9	3,615,546	Aug	159	133.6	324,038	677	1,917.9	4,053,189	407	2,762.2	5,918,893	Sept	135	76.0	238,675	297	819.8	2,007,621	317	2,371.5	5,622,979	Oct-Dec	57	83.2	209,947	39	214.9	546,858	50	519.0	1,268,575	Total	424	349.4	912,139	1501	4,573.7	10,190,662	994	7,339.6	16,425,993
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2010 Month	California			Oregon			Washington		
	No.	mt	Revenue \$	No.	mt	Revenue \$	No.	mt	Revenue \$
Jan-Jul	19	6.5	19,606	350	1482.3	3,809,220	201	1,507.4	3,791,638
Aug	82	27.4	78,039	654	1,836.7	4,603,478	312	1,927.5	4,573,585
Sept	174	190.3	499,648	350	1048	2,761,919	272	2,511.9	6,151,725
Oct-Dec	119	486.7	1,117,707	103	486.6	1,247,792	46	311.3	839,021
Total	394	710.9	1,715,000	1457	4,853.6	12,422,409	831	6,258.1	15,355,969

In 2010, 651 U.S. vessels participated in the North Pacific albacore fishery in total, down from 680 in 2009 (PFMC 2011). 66 AAFA vessels participated in the fishery in 2010. These pole & line and troll/jig vessels landed approximately 50% of the total U.S. harvest for the fishery. Approximately 75% of the AAFA catch was MSC certified.

Item	Comments
3	Condition of Certification - The Stock is at an appropriate level to maintain long term productivity.
Activity assessed	<p>This Condition relates to Principle 1, performance indicators: 1.1.4.1:</p> <p>1.1.4.1 100 scoring guidepost</p> <ul style="list-style-type: none"> The stock is highly likely to be consistently above precautionary reference levels. <p>80 scoring guidepost</p> <ul style="list-style-type: none"> The stock is likely to be above precautionary reference levels. <p>60 scoring guidepost</p> <ul style="list-style-type: none"> The stock is likely to be above the limit reference levels and trends in the stock are positive. <p>Score 75</p> <p>Condition</p> <p>The present stock assessment suggests that the stock may be “<i>either fully exploited or sustaining fishing mortality above levels that are sustainable in the long term</i>”. Accordingly, management resolutions have been provided by IATTC/WCPFC for a cap on existing effort and expedited reporting of catches. Also, a re-examination of stock assessment data has been initiated by ISC. Actions required of AAFA in this regard are:</p> <ol style="list-style-type: none"> AAFA to promote and support the management actions put forward, notably limitations on effort. Communications supporting such management measures should be made to the PFMC and/or NMFS. Records should be provided by AAFA of communications and responses. AAFA to provide a summary to Intertek Moody Marine on US’s responses to IATTC/WCPFC management resolutions, as provided by NMFS and/or PFMC. In

	<p>addition, responses are to be provided by AAFA regarding stock assessments and related research and recommendations for management actions pertaining to albacore from the International Scientific Committee (ISC) Albacore Working Group, the Northern Committee, and IATTC or other working groups .</p> <p>3. Should the existing resolution be withdrawn following the ISC report, then this Condition would be considered closed.</p> <p>4. If additional resolutions are proposed, then these should be supported as in 1 above.</p> <p>Timescale. Point 1: If still appropriate, should be pursued immediately upon certification. Point 2: AAFA should provide this information within 6 months of certification. Point 4: Should further resolutions be passed by IATTC/WCPFC in this regard, supportive actions should be initiated at the earliest possible opportunity thereafter.</p>
<p>Conclusion from 1st Surveillance Report</p>	<p>There are four parts to the Condition, summarised as:</p> <ol style="list-style-type: none"> 1. AAFA to make representations to advocate and support limitations of fishing effort; 2. AAFA to provide a summary US response to IATTC/WCPFC management resolutions; 3. If additional management resolutions are proposed to improve stock status, then AAFA should support them as in 1 above. 4. If stock status improves and the need to cap fishing effort is removed the Condition would be considered closed. <p>AAFA have achieved the first two points and confirmed their commitment to continue to advocate fishing effort limitations.</p> <p>In accordance with the fourth point, because the management resolution to cap fishing effort remains in place, the Condition remains open.</p>
<p>Conclusion from 2nd Surveillance Report</p>	<p>AAFA has exhibited extensive, broad, and consistent efforts in promoting and supporting both domestic and international responsible management actions regarding the North Pacific albacore resource. The stock status has also been revised as being at high abundance. All elements of this Condition of the certification have therefore been met.</p> <p>This performance indicator was originally scored 75. On the basis of the work AAFA has committed to and carried out, and because of the evidence that the stock is performing well, the audit team has now rescored the performance indicator at 80. The Condition is therefore closed this year.</p> <p>100 scoring guidepost</p> <ul style="list-style-type: none"> • The stock is highly likely to be consistently above precautionary reference levels. <p>80 scoring guidepost</p> <ul style="list-style-type: none"> • The stock is likely to be above precautionary reference levels. <p>It should be noted that a new stock assessment is planned for 2010, and this</p>

	<p>information should be available prior to the next audit. This information will be closely scrutinized, and may allow the score for this performance indicator to be increased.</p> <p>There is also an expectation from the audit team that AAFA continue to work to advocate appropriate, sustainable management of the fishery. As such, the Condition may be reintroduced in future if an annual audit team is not satisfied that AAFA is performing adequately with regard to the intent of this Condition.</p>
<p>Conclusion from 3rd Surveillance Report</p>	<p>It should be noted that a new stock assessment is now planned for 2011, and this information could be available prior to the next audit. This information will be closely scrutinized.</p> <p>There is also an expectation from the audit team that AAFA continue to work to advocate appropriate, sustainable management of the fishery through the adoption of limit and target reference points and harvest control rules.</p>
<p>AAFA Activity</p>	<p>During the recent year (2010-2011) following the 3rd surveillance audit of the AAFA MSC certification for the North Pacific albacore fishery, AAFA has pursued and supported management of North Pacific albacore domestically to the Pacific Fishery Management Council (PFMC) and internationally to the IATTC and WCPFC. AAFA has become a formal member of the U.S. delegation to the IATTC, and an observer on the General Advisory Committee (GAC) and the Scientific Advisory Subcommittee to the U.S. Section to the IATTC. AAFA has written letters in support of albacore management and attended management forums including:</p> <p><u>Letters</u></p> <ul style="list-style-type: none"> • Letter to PMFC, November 6, 2010; Re: PMFC Agenda Item J.3.c: IUU Fishing & Recommendations to RFMOs and Agenda Item K.4.c: Future Council Meeting Agenda & Workload Planning. • Letter to PFMC, November 8, 2010: Re; PMFC Agenda Items C.1.c. & J.1.c: Enforcement & IUU Fishing. Noted many fresh net-marked albacore encountered on fishing ground and AAFA fishermen to support USCG efforts to halt IUU. • Letter to PFMC, including signatures of AAFA members, dated April 2011; Expresses that the U.S. should lead discussions towards effective international management of the North Pacific albacore resource and states the AAFA position on possible domestic management measures. • Letter to the WCPFC, dated November 10, 2010 Re: Expresses support and cooperation to WCPFC and its Northern Committee regarding HMS conservation and management; encourages the U.S. to continue providing leadership, scientific advice, and financial support to WCPFC; and requests that the Northern Committee undertake discussions regarding albacore management. • 2011 Letter to AAFA members reconfirming AAFA Code of Conduct. <p><u>Meeting Attendance</u></p> <ul style="list-style-type: none"> • Participated in September 2010 General Advisory Committee (GAC) to U.S. Section to the IATTC. • Participated in September 2010 PFMC/HMS Management Team and PMFC/Advisory Subpanel. AAFA urged that the U.S. take a more aggressive leadership role at the international management level at the upcoming IATTC meetings.

	<ul style="list-style-type: none"> • Participated in January 19-20, 2011 meeting of the PMFC/HMS Management Team; addressed large number of topics related to the management of the U.S. North Pacific albacore fishery. • Participated in April 2011 meetings of the PFMC, PMFC/HMS Management Team, and PMFC/Advisory Subcommittee. • Participated in May 25-26, 2011 meetings of IATTC GAC and Scientific Advisory Subcommittee (SAS). Expressed AAFA's support for international management of albacore. • Participated in June 2011 PFMC Highly Migratory Species Management Team and Highly Migratory Species Advisory Subpanel meetings, Spokane, WA, USA. A large number of topics addressed regarding albacore management including request that PMFC make the recommendation that U.S. delegations to IATTC and WCPFC work to establish a timetable for implementing appropriate Biological Reference Points. • Participated in the 82nd meeting of the IATTC held July 3-8, 2011 for the first time as a member of the U.S. delegation demonstrating AAFA's significant involvement in matters regarding international management of Pacific albacore resources.
Observations	<p>The results of the recent North Pacific albacore assessment suggest that, in combination with stable albacore recruitment, the resolutions adopted by the IATTC and WCPFC to cap effort have supported the maintenance of catches of albacore at sustainable levels. The high cost of fuel may also have been a factor in limiting recent fishing activity.</p> <p>It is noted that Canadian representatives at a September 2011 meeting of the WCPFC Northern Committee proposed that the current strength of the North Pacific albacore stock presented an opportunity to discuss the introduction of a long term strategy for the stock, including introducing biological reference points and pre-agreed decision rules that triggered management action (WCPFC 2011a). The introduction of a limit reference point and control rule was supported as a priority for the US delegation (WCPFC 2011a). Addressing these issues was laid out in a work program for completion in 2013.</p> <p>While the WCPFC Northern Committee's examination of current F against a number of F-based reference points, as described above in Item 1, is an important step in formalizing effective management measures, it continues to be the case that the both the WCPFC and the IATTC have yet to agree and adopt limit and target reference points or control rules. The interim objective of maintaining the spawning stock biomass above the average of the ten historically lowest estimated points with a probability greater than 50% has yet to be formally adopted as a reference point.</p>
Conclusions	<p>The Condition that was placed on AAFA when their North Pacific albacore fishery was first certified in 2007 was closed-out in the Year 2 surveillance audit. At that point, it was considered that the SG80 requirement that "<i>The stock is likely to be above precautionary reference levels</i>" had been met. The assessment team also considered that AAFA's efforts to engage with managers and advocate sustainable management met the spirit of the Condition.</p> <p>AAFA has recently entered into the MSC reassessment process, and the MSC's default assessment tree now requires that reference points and control rules for stock management are in place. Thus, assuming the fishery is recertified following reassessment, the formal adoption by the WCPFC and IATTC of reference points and control rules will be of fundamental importance to AAFA. Such adoption may</p>

	<p>be a significant hurdle to overcome, but while AAFA is a relatively small organisation, the increasing number of certified albacore and other tuna species fisheries in the Pacific should be harnessed to provide impetus in promoting the sustainable management of the fishery.</p> <p>A potential barrier to progress on the adoption of management measures for North Pacific albacore is that the stock has been assessed to be healthy; the poor stock status of other tuna species in the Pacific, including bigeye tuna and bluefin tuna, means that the focus of attention in management fora is likely to be on those other tuna species. Nevertheless, the recent Canadian and US advocacy for using the healthy condition of the albacore stock as a means to introduce sustainable management measures is a welcome sign.</p>
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Item	Comment
4	Any complaints against the certified operation; recorded, reviewed and auctioned.
	No complaints were received against the certified operation in the course of this year's certification. The WWF submitted evidence for this surveillance audit and the reassessment process.

Item	Comment
5	Any relevant changes to legislation or regulations
	<p>Following the awarding of their MSC certificates, AAFA introduced and implemented its own certificate-sharing programme.</p> <p>Because AAFA operates under the Californian Fish Marketing Act there is a requirement within the "Act" that the certificate-sharing programme be limited to AAFA members. AAFA originally created a two-tier membership that allowed full or partial membership. Both forms of membership enabled participation in the MSC programme, however, only full membership afforded full privileges and voting rights.</p> <p>In 2010, AAFA changed the requirements of the certificate-sharing programme, by removing the option for partial membership. This was to ensure that fishermen who benefitted from the MSC certification were also fully on board with AAFA's commitment to quality and to the performance requirements of the AAFA certificate.</p> <p>AAFA has provided Intertek Moody Marine with updates on their membership thereby ensuring that a record of vessels that form part of the certificate sharing program is maintained. The assessment team had been pleased to note that membership of AAFA, and participation on the certificate-sharing programme, had grown considerably, from 26 vessels in 2006, to 53 vessels in 2008, to 71 vessels in 2009. Following the changes made by AAFA to the certificate-sharing programme, the assessment team were pleased to note that membership had dropped only slightly to 69 vessels. For 2011, the number of AAFA again dropped slightly to 66 vessels.</p>

Item	Comment
6	Any relevant changes to management regime.

	<p>US/Canada Albacore Tuna Treaty US/Canada treaty negotiations resulted in a new fishing regime that started in 2009 and is now in the second year of its three-year provision. Renegotiations are expected to take place in 2012. Provisions of the Treaty include: limiting the number of Canadian vessels that may operate in the US EEZ to 110, all of which are restricted to their existing troll/jig fishery practices; the number of U.S. vessels that may fish in Canada's EEZ is to remain within historical levels; defined the Canadian vessel access period as starting June 15 and ending October 31; and either country may terminate the new regime in the event that international or domestic management measures are adopted.</p>
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Item	Comment
7	Harmonisation with other relevant fisheries.
	<p>Existing Situation The Canadian Highly Migratory Species Foundation (CHMSF) and the Western Fishboat Owner's Association (WFOA) fisheries for North Pacific albacore tuna were certified by the Global Trust certification body on 23rd March 2010. These fisheries target the same albacore stock and occur in the same or adjacent waters as the AAFA North Pacific albacore fishery, such that a harmonisation review must be carried out to ensure consistency of outcomes between similar MSC-certified fisheries, as described in Technical Advisory Board Directive (TABD) 15 (2.1) (MSC 2010). A significant effort was made to review the harmonisation of the fisheries for AAFA's third audit in 2010, and this was repeated by Global Trust in their 1st annual surveillance audit of the CHMSF and WFOA fisheries in early 2011.</p> <p>Although direct comparison of the AAFA fishery with the CHMSF and WFOA fisheries was not possible due to the AAFA fishery having been certified under a non-standard, pre-Fishery Assessment Methodology (FAM) assessment tree, Intertek Moody Marine considers that the fishery assessments were consistent. The conditions of certification were near identical, and the action plans were somewhat similar. Overall, Intertek Moody Marine Ltd. considered that there was no reason why the certificate holders of the AAFA, WFOA and CHMSF fisheries for North Pacific albacore should not function similarly in respect of their certificates. This was confirmed by Global Trust in their first annual audit of the WFOA and CHMSF fisheries, and there have been no changes in the last year that suggest a further detailed harmonisation review is required at this time.</p> <p>Reassessment Situation The existing AAFA certificate will expire on the 23rd August 2012. AAFA has, though, chosen to proceed with the reassessment of their North Pacific albacore fishery against the MSC's Principles and Criteria for sustainable fishing, with the aim of gaining recertification. In the period between AAFA's first assessment and this new assessment, the MSC has updated and standardised the assessment process through the introduction of the Fishery Assessment Methodology v.1 (2008) and v.2 (2009), and most recently the Certification Requirements (2011). A standardised assessment tree will therefore be used in the upcoming reassessment. In addition, the reassessment will carefully consider the findings of other recently certified tuna fishery assessments (e.g. the New Zealand South Pacific albacore troll fishery that was certified using FAM V.2.1 in June 2011 (IMM 2011)), while a further harmonisation review of the CHMSF and WFOA North Pacific albacore fisheries will also be required.</p>

Item	Comment
8	Overall Conclusions
	<p>The overall management of the fishery continues to equal or exceed the standard observed during the full assessment.</p> <p>Considerable and encouraging advances are being made, in the WCPFC in particular, with respect to the introduction of reference points and a control rule, and AAFA continues to devote effort to advocating appropriate, sustainable management approaches. AAFA has also confirmed their intent to continue to participate in the management and advisory forums, and the assessment team is encouraged by their commitment to working with other certified fisheries to promote sustainable management of the albacore fishery.</p> <p>MSC Certification should therefore continue for the final year of this existing certificate, as AAFA's North Pacific albacore pole & line and troll/jig fishery moves forward through reassessment.</p>

Information Sources:

Global Trust (2010). MSC fishery assessment report: public certification report, the Canadian Highly Migratory Species Foundation North Pacific albacore (*Thunnus alalunga*) tuna fishery, and the American Western Fishboat Owners' Association (WFOA) North Pacific albacore (*Thunnus alalunga*) tuna fisheries. Date of submission: 22nd March. Global Trust, Dundalk. 174 pp.

IMM (2011). MSC fishery assessment report: public certification report V5, New Zealand albacore tuna troll fishery. Date of submission: 17th May. Moody International. 233 pp

MSC (2009). Fisheries assessment methodology and guidance to certification bodies; including default assessment tree and risk-based framework, version 2. The Marine Stewardship Council, London, 122 pp.

MSC (2010). TAB Directive 015 v.2.1: Harmonised fishery assessments. The Marine Stewardship Council, London. 3 pp.

MSC (2011). MSC Certification Requirements, version 1.1, 24 October 2011. The Marine Stewardship Council, London, 271 pp.

Northern Committee Seventh Regular Session 6-9 September 2011, Sapporo, Japan: Report of the ISC Albacore Working Group (ALBWG) for 2011, WCPFC-NC7—2011/IP-02.

PFMC (2011). Status of the U.S. West Coast fisheries for highly migratory species through 2010: stock assessment and fishery evaluation, September 2011. Pacific Fishery Management Council, Portland. September 2011, 164 pp.

WCPFC (2011a). Summary report of the sixth regular session of the Northern Committee, Sapporo, Japan; 6-9 September 2011, Western and Central Pacific Fisheries Commission, 37 pp.

Meetings Conducted

Date	Organisation	Attending
26 th October 2011	AAFA Intertek Moody Marine Ltd Intertek Moody Marine Ltd Intertek Moody Marine Ltd	Mr. Chip Bissell Dr. Rob Blyth-Skyrme Dr. Norman Bartoo Dr. Mike Laurs
27 th October 2011	AAFA Intertek Moody Marine Ltd Intertek Moody Marine Ltd Intertek Moody Marine Ltd SWFSC, NOAA SWFSC, NOAA SWFSC, NOAA SWFSC, NOAA SWFSC, NOAA NMFS SW Region	Mr. Chip Bissell Dr. Rob Blyth-Skyrme Dr. Norman Bartoo Dr. Mike Laurs Dr. Dale Sweetnam Dr. John Childers Dr. Steven Teo Dr. Stephen Stohs Dr. Russ Vetter Dr. Craig Heberer
27 th October 2011	AAFA AAFA Intertek Moody Marine Ltd Intertek Moody Marine Ltd Intertek Moody Marine Ltd	Mrs. Natalie Webster Mr. Chip Bissell Dr. Rob Blyth-Skyrme Dr. Norman Bartoo Dr. Mike Laurs
28 th October 2011	AAFA Intertek Moody Marine Ltd Intertek Moody Marine Ltd Intertek Moody Marine Ltd PFMC	Mr. Chip Bissell Dr. Rob Blyth-Skyrme Dr. Norman Bartoo Dr. Mike Laurs Ms. Marija Vojkovich

Standards and Guidelines used:

1. MSC Principles and Criteria for Sustainable Fishing
2. MSC Fishery Certification Methodology Version 6. September 2006
3. TAB Directives – all

Appendix A

**MSC Assessment
American Albacore Fishing Association (AAFA)
North Pacific Albacore Pole & Line and Troll/Jig Fishery**

We are pleased to announce that the MSC fishery certification assessment is underway for the AAFA North Pacific albacore fishery. This assessment will evaluate this fishery for compliance with the Marine Stewardship Council Principles and Criteria for Sustainable Fishing. The certification body contracted to assess this fishery is Intertek Moody Marine.

The fishery under assessment is defined here as the AAFA North Pacific albacore pole & line and troll/jig fishery.

The client for the assessment is AAFA.

As is normal practice it is our intent to combine the final surveillance audit for the existing certification with the re-certification site visit. The date for the visit will be announced in due course.

The provisional assessment schedule sets out the key stages and approximate timings involved. Initially, Intertek Moody Marine seeks to open a dialogue with all organisations or individuals with a direct interest in this fishery. Anyone wishing to become a consultee 'stakeholder', to nominate other organisations/individuals as stakeholders or to provide comments or information to the assessment process (in terms of the status of the stock, ecosystem interactions or fishery management practices) is invited to contact Intertek Moody Marine.

The assessment schedule identifies future key consultation stages (marked in red). For reference, month 1 is taken to be September 2011. The target date for certification of the fishery is 1st September 2012.

We are also in the process of assembling an assessment team of individuals with experience of stock assessment, ecosystem interactions and fishery management appropriate to this fishery. Any nominations of suitable individuals are also welcomed.

The Contact details for Intertek Moody Marine are:

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Appendix B**World Wildlife Fund
Fisheries**

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worldwildlife.org

27 October, 2011

Dr. Rob Blyth-Skyrme
Intertek Moody Marine
Merlin House, Stanier Way
Wyvern Business Park
Derby DE21 6BF
UK

Subject: American Albacore Fishing Association (AAFA) North Pacific Albacore Pole & Line and Troll/Jig Fishery, and American Albacore Fishing Association (AAFA) South Pacific Albacore Pole & Line and Troll/Jig Fishery

Dear Dr. Blyth-Skyrme:

WWF welcomes the opportunity to engage as a stakeholder in the assessment for re-certification of the AAFA North and South Pacific albacore pole & line and troll/jig fisheries. We have the following concerns regarding the re-assessments:

1. Stock Status. Some of the Principle 1 (P1) indicators are not met by any of the regional fishery management organizations (RFMOs) for tuna, including the Inter-American Tropical Tuna Commission (IATTC) and the Western and Central Pacific Fisheries Commission (WCPFC), which are responsible for the management of the North Pacific and South Pacific albacore stocks. For example, while there is an implicit reference point in the treaties establishing these two RFMOs, it is not precautionary, nor is it adopted formally by the RFMOs, nor is it explicitly designated as either the target or limit reference point. These are required in order for a fishery to meet the MSC Standard. WWF is aware that in the case of the WCPFC and North Pacific albacore stock that an interim working reference point has been used as a proxy for BMSY, but again this does not meet the stringent MSC requirement of having two precautionary reference points, both target and limit. In addition, there are similar shortcomings against the FAM for a harvest control rule tied explicitly to the reference points and an over-arching specific fishery management plan for the stocks. There are other less obvious P1 deficiencies that stem from the RFMOs' management that WWF looks forward to reviewing in the draft assessment reports.

2. Previous Conditions. The current certifications for these two stocks were based on one or more conditions. WWF believes that, based on its review of the records available to it and knowledge of the actions of the client, these conditions have not been met. WWF's information may be incomplete and it looks forward to reviewing material presented by the client as a basis for moving forward into re-certification. WWF recognizes that the formal MSC guidelines with regard to conditions and, indeed, the FAM itself have been substantially strengthened since the time of AAFA's initial certification (i.e., FAM v.2 and TAB Directive 033). However, even though the current conditions for the two units of certification (UoCs) are not articulated as explicitly as is

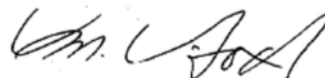
now required by the MSC, the conditions as stated – and the spirit of the MSC standard – were not met. Looking forward, should the client again be certified with conditions, WWF points out that the conditions imposed on the New Zealand albacore fishery serve as a good example for tuna fisheries, especially because they require the firm official commitment of the government of New Zealand to represent the fishery at the WCPFC since the RFMO is comprised of sovereign governments and affords little to no direct stakeholder involvement. WWF believes that a similar commitment from the UoC's national government should be required in order to meet conditions that involve changes at the RFMO level.

3. Bait fishes. For the pole and line component of the fishery, bait fishes are required for the fishery to even exist much less be sustainable, and therefore are a target species that should be included in the UoCs and assessed under P1. Furthermore, WWF is opposed to assessing impacts on bait fishes under Principle 2 of the default FAM as an alternative to including them in the UoC. For the pole and line fishery to be truly sustainable, bait fishes must be managed at least as well as the albacore themselves. Since the bait fishes used are low trophic level species in the ecosystem, TAB Directive 036 (Assessment of Low Trophic Level Fisheries) applies, providing reasonable guidance on default reference points for bait fishes. WWF believes that the best course is to include bait fishes in the UoCs and assess them under P1 but, failing that, TAB Directive 036 provides excellent guidance for appropriately modifying the FAM to ensure that bait fishes will be managed at a level that meets the MSC standard.

4. Management Levels. For fish stocks to be sustainable and meet the MSC standard they must be adequately managed throughout their range. For the Pacific albacore stocks, the legally competent bodies to accomplish this are the IATTC and WCPFC. Also of critical importance are national, regional, and local jurisdictions, but these are of decreasing importance due to the pan-Pacific nature of the albacore stocks. This entire cascade of legal structure starting with the RFMOs needs to be assessed under Principle 3. The top body, or RFMO, that jointly covers the range of each stock is of utmost importance and needs to be weighed accordingly when assessing Principle 3.

While it is unlikely that anyone from WWF will personally attend the site visits due to schedule conflicts, this does not reflect any lack of interest in ensuring that Intertek Moody Marine completes the best, most rigorous assessments possible. WWF looks forward to explicit responses to our concerns as expressed here and to engaging in the assessments.

Best Regards,



William W. Fox, Jr., Ph.D.
Vice President, Fisheries
WWF-US