



**Surveillance Report 4**  
**American Albacore Fishing Association (AAFA) –**  
**South Pacific Albacore Troll/Jig Fishery**

Certificate No.: **MML-FC-015**

**Moody Marine Ltd.**  
November 2011

Authors: N. Bartoo, R. Blyth-Skyrme, M. Laurs

Intertek Moody Marine Ltd  
815 – 99 Wyse Road  
Dartmouth  
Nova Scotia  
B3A 4S5  
CANADA

**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 Troll/Jig Fishery.

**Species:** Albacore tuna (*Thunnus alalunga*)

**Area:** South Pacific

**Method of capture:** Troll/Jig

<b>Date of Surveillance Visit:</b>	<b>26 – 28 October 2011</b>			
<b>Initial Certification</b>	<b>Date: 4<sup>th</sup> September 2007</b>		<b>Certificate Ref: MML-FC-015</b>	
<b>Surveillance stage</b>	<b>1<sup>st</sup></b>	<b>2<sup>nd</sup></b>	<b>3<sup>rd</sup></b>	<b>4<sup>th</sup></b>
<b>Surveillance team:</b>	<b>Lead Assessor: Rob Blyth-Skyrme</b> <b>Assessor(s): Norman Bartoo</b> <b>Mike Laurs</b>			
<b>Company Name:</b> <b>Address:</b>	American Albacore Fishing Association 4364 Bonita Road #311 Bonita CA 91902			
<b>Contact 1</b>	<b>Natalie Webster</b> <b>American Albacore Fishing Association</b>			
<b>Tel No:</b>	+1 (866)-851-3918			
<b>Fax No:</b>	+1 (866)-851-3948			
<b>E-mail address:</b>	nataliewebster@americanalbacore.com			

## 2.0 INTRODUCTION

This report contains the findings of the fourth surveillance audit in relation to the American Albacore Fishing Association (AAFA) South Pacific Albacore 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 National Marine Fisheries Service (NMFS) scientists to provide input to the audit process. Confirmation from the MSC that the audit could be delayed was posted to the MSC website on the 19<sup>th</sup> July 2011. An announcement of the surveillance audit was then published on the MSC website on the 16<sup>th</sup> 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.

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 (SWFSC). A conference call was also held with a council member of the Pacific Fisheries Management Council (PFMC), who is also a member of the US delegation to the Western and Central Pacific Fisheries Commission (WCPFC). During these discussions, evidence was gathered on the status of the stock, the performance of the fishery throughout the year, measures to meet the Condition of Certification and changes in management. 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 is provided along with the surveillance team's observations, conclusions and recommendations on the current status of the fishery and the client's progress toward meeting the single Condition of Certification.

With respect to the remaining Condition, the following table sets out the original assessment scoring guideposts and scoring commentary and the requirements of the original Condition alongside the heading 'Activity assessed'. This identifies the areas in which the fishery was determined to be performing below the level required by the MSC standard during the initial assessment, and the required actions to address these issues.

As required by the MSC assessment methodology, during the initial assessment, AAFA produced an Action Plan 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 has provided information on the work undertaken to date.

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.

If and when a Condition has been judged to have been met, a re-evaluation of the scoring allocated to the relevant Performance Indicator(s) in the original MSC assessment will be included within the evaluation.

Item	Comments
<b>1</b>	<b>Stock status</b>
<b>Observations</b>	<p data-bbox="440 259 735 293"><b>South Pacific Albacore</b></p> <p data-bbox="440 327 1418 495">The previous two stock assessments for South Pacific albacore (Hoyle <i>et al.</i> 2008 and Hoyle &amp; Davies 2009) concluded that there are no sustainability concerns regarding the overall stock. A reassessment of the stock was conducted 2011 (Hoyle 2011). Due to improved understanding of the data inputs, the model structure of the 2009 alternate case was applied in the 2011 reference case.</p> <p data-bbox="440 528 1418 595">In 2011, the following conclusions relative to stock status were reached and presented:</p> <ul data-bbox="448 629 1418 1648" style="list-style-type: none"> <li>• Estimated stock status is similar to 2009 estimates.</li> <li>• Biological research indicates that male and female albacore have quite different growth curves, which are not included in the new model. Growth curve errors can bias estimates of biomass and fishing mortality. While this might indicate that some caution should be used in interpreting some management parameters (absolute calculated biomass and fishing mortality) the use of ratio estimates is not greatly affected. The use of an average growth rate combined with an approximate 50:50 sex ratio in the catch also reduces bias in yield per recruit estimates.</li> <li>• There is considerable uncertainty about the early biomass trend, but this has negligible effect on the management parameters, or advice to managers regarding the status of the stock.</li> <li>• The ratios <math>F_{2007-2009}/F_{MSY}</math> (0.26) , <math>SB_{2009} / SB_{MSY}</math> (2.25), and <math>B_{2007-2009}/B_{MSY}</math> (1.26) do not indicate that overfishing of South Pacific albacore is occurring, nor do they indicate that the stock is in an overfished state.</li> <li>• Results from the 2009 assessment suggest that much variation in management parameters is attributable to the way the assessment model converges on parameter estimates or “steepness”, which we have no information about. This variation makes management advice based on maximum sustainable yield, MSY, (85,200mt) relatively uninformative. Alternative metrics such as the expected catch per unit effort, CPUE, relative to a target CPUE, may be less affected by uncertainty. They may also be more relevant to the management needs of the fishery.</li> <li>• There is no indication that current levels of catch (50,000 – 70,000 mt) are causing recruitment overfishing, particularly given the age selectivity of the fisheries.</li> <li>• Longline catch rates appear to be declining, and catches over the last 10 years have been at historically high levels. This CPUE trend may be significant for management.</li> </ul> <p data-bbox="440 1682 1418 1883">In summary, the 2011 assessment confirmed (with additional data and an updated model) the results of the previous two assessments. While some questions remain (differential growth rates and early biomass trends) the ratio of current fishing mortality (F) to commonly applied F-bases reference points indicate the South Pacific albacore stock is not overfished and is not experiencing overfishing. The current assessment is robust.</p> <p data-bbox="440 1917 1174 1951"><b><i>Management actions in Response to Status and Conclusions</i></b></p> <p data-bbox="440 1984 1418 2022">As noted above, the South Pacific albacore stock is currently not overfished nor is</p>

	overfishing occurring, and current biomass levels are sufficient to support current levels of catch. Yet, increases in catch or effort could likely result in catch rate declines, especially relating to longline catches of adult albacore. Consequently, the WCPFC Scientific Committee has recommended that that vessel activity must continue to be managed as per the requirements of Conservation and Management Measure (CMM) 2010-05 (WCPFC 2011). The Commission is expected to act on this recommendation at its next meeting in December 2011.
--	--

Item	Comments
<b>2</b>	<b>The Fishery</b>
<b>Observations</b>	<p>The history of the fishery from all sources (not just AAFA) involves distant-water longline fleets of Japan, Korea and Chinese Taipei, and domestic longline fleets of several Pacific Island countries which catch primarily adult albacore over a large proportion of their geographic range. In recent years, the longline catch has expanded considerably with the development or expansion of small-scale longline fisheries in several Pacific Island countries, notably Samoa, American Samoa, Fiji, Tonga, Cook Islands, New Caledonia and French Polynesia. A troll fishery for juvenile albacore has operated in New Zealand coastal waters since the 1960s and in the central Pacific in the region of the Sub-Tropical Convergence Zone (STCZ) since the mid-1980s. Driftnet vessels from Japan and Chinese Taipei targeted albacore in the central Tasman Sea and in the central Pacific near the STCZ during the 1980s and early 1990s. Surface fisheries are highly seasonal, occurring mainly during December to April. Longline fisheries operate throughout the year although there is a strong seasonal trend in the distribution of the catch with the fishery operating in the southern latitudes (south of 35° S) during late summer and autumn and moving northwards during winter.</p> <p>After an initial period of development, annual catches of South Pacific albacore varied considerably and are now about 60,000 to 70,000 mt. Longline gear accounts for most of the catch, about 25-30,000 mt per year on average prior to about 1998, increasing to approximately 70,000 mt in 2005. This increase was largely due to the development of small-scale longline fisheries in Pacific Island countries. Troll catches are relatively small, generally producing less than 10,000 mt per year. The driftnet catch reached 22,000 mt in 1989, but has since declined to zero following a United Nations moratorium on industrial-scale drift-netting.</p> <p>Provisional data from the WCPFC (WCPFC 2011) indicate that the South Pacific catch in 2010 was 88,919 mt, the highest on record and 12,000 mt. higher than previous record in 2009 at 76,500 mt. Troll catches of albacore distributed in New Zealand coastal waters and on the high seas along the Subtropical Convergence Zone amounted to less than 3,000 mt. In order to participate in the South Pacific troll/jig fishery, U.S. West Coast albacore vessels must travel more than 10,000 miles in total, not including distance travelled on the fishing grounds. Due to high fuel costs and uncertainty in market conditions, only a very limited number of U.S. vessels (6) participated in the fishery in 2010. These vessels landed an estimated 307 tons in total (WCPFC 2011). One AAFA albacore fishing vessel participated in the fishery; their catch was reported to be representative of the other vessels in the US fleet.</p>

Item	Comments
<b>3</b>	<b>Condition of Certification - Decision rules and harvest control mechanisms</b>
<b>Activity Assessed</b>	<p>This Condition relates to Principle 1, performance indicators: 1.1.3.6 and 1.1.3.7:</p> <p><b>1.1.3.6</b> <b>100 scoring guidepost</b></p> <ul style="list-style-type: none"> <li>• Clear, documented and tested decision rules are fully implemented and have been fully reconciled with reference points, and the data and assessment limitations, and have been periodically evaluated.</li> </ul> <p><b>80 scoring guidepost</b></p> <ul style="list-style-type: none"> <li>• Clear decision making rules exist, are fully documented, but may not have been fully evaluated. Decision rules are reconciled with appropriate reference points and with data and assessment limitations.</li> </ul> <p><b>60 scoring guidepost</b></p> <ul style="list-style-type: none"> <li>• It can be demonstrated that decision making, though not documented, is logical and appropriate. Rules may not have been tested</li> </ul> <p><b>Score 75</b> The scientific basis for decision making is well established and documented. At this point in the stock's exploitation history, decision rules are not mandatory, but effort should be made soon to begin the definition/evaluation process. Decision rules are currently based on the fundamental B/BMSY and F/FMSY benchmarks. Reconciliation with reference points and data/assessment limitations is undertaken as discussed above. The overarching decision rule to maintain stocks at or above MSY has been established and codified by the Commissions. Thus, this decision rule in place is consistent with reference points from the assessment and the limitations of data that are inputs to the assessment.</p> <p><b>1.1.3.7</b> <b>100 scoring guidepost</b></p> <ul style="list-style-type: none"> <li>• Mechanisms are in place to contain harvest as and when required to maintain (or allow the target stock to return to) productive levels. Specific measures to demonstrate effectiveness are in place.</li> </ul> <p><b>80 scoring guidepost</b></p> <ul style="list-style-type: none"> <li>• Appropriate mechanisms are in place to contain harvest as and when required to maintain, or allow the target stock to return to, productive levels</li> </ul> <p><b>60 scoring guidepost</b></p> <ul style="list-style-type: none"> <li>• Mechanisms exist to monitor and (if necessary) reduce harvest, but may not fully contain harvest, or have not been tested/evaluated</li> </ul> <p><b>Score 75</b> Mechanisms (should they be needed) can be initiated through the IATTC and WCPFC. Comparable actions have been taken by IATTC and WCPFC for other species (such as yellowfin and bigeye tunas). Currently, measures are in place in both Commissions to not allow increases in fishing effort on albacore.</p>

	<p>This is exemplified by the Conservation and Management Measure WCPFC-03 which went into place on Feb 16, 2006.</p> <p><b>Condition</b> It is recognised that the South Pacific albacore stock is assessed to be in a situation where recent catches are less than the MSY, aggregate fishing mortality is less than <i>F</i>MSY and the adult biomass is greater than <i>B</i>MSY. As such, at this point in the stock's exploitation history, decision rules are not mandatory, and specific mechanisms to control harvest are not needed (although these have been implemented for other species when required). However, to expedite the precautionary consideration of such rules and mechanisms, AAFA are required to take appropriate steps to request that management agencies begin a process to develop a framework for development and clear documentation of decision rules and appropriate harvest control mechanisms in the fishery.</p> <p><b>Timescale:</b> Appropriate requests from AAFA should be made within 6 months of certification of the fishery.</p>
<p><b>Conclusion from 1<sup>st</sup> Surveillance Report</b></p>	<p>AAFA has confirmed their commitment to continue to advocate that management agencies begin a process to develop a framework for development and clear documentation of decision rules and appropriate harvest control mechanisms in the fishery.</p> <p>Because there are no sustainability concerns regarding the overall status of the stock the management agencies have not felt inclined to formally adopt the reference points nor develop decision and harvest control rules</p> <p>While AAFA have met the requirement of the Condition it remains open until clear decision making rules are developed, fully documented and reconciled with appropriate reference points and with data and assessment limitations.</p> <p>AAFA have an on-going commitment to continue to advocate for sustainable and well managed albacore fisheries in the South Pacific and we heard that they will continue to press for the development of clearly documented decision rules and appropriate harvest control mechanisms in the fishery. Evidence of this commitment will be reviewed at the next annual audit.</p>
<p><b>Conclusion from 2<sup>nd</sup> Surveillance Report</b></p>	<p>AAFA has made considerable efforts to promote and support both domestic and international responsible management actions, as appropriate, regarding the South Pacific albacore resource over the course of this certificate.</p> <p>It is clear that the WCPFC managers are working to advance understanding of the South Pacific albacore and its fishery, to support the management regime that already includes a commitment to cap fishing effort at historic (1999-2005) levels.</p> <p>In conclusion, satisfactory progress is being made on this Condition, and further work, as described, should allow this condition to be closed.</p>
<p><b>Conclusion from 3<sup>rd</sup> Surveillance</b></p>	<p>AAFA has continued to make considerable efforts to promote and support both domestic and international responsible management actions, as appropriate, regarding the South Pacific albacore resource over the course of</p>

<b>Report</b>	<p>this certificate. It is clear that the WCPFC managers are also continuing to work to advance understanding of the South Pacific albacore and its fishery, to support the management regime that already includes a commitment to cap fishing effort at historic (1999-2005) levels.</p> <p>In conclusion, satisfactory progress is still being made on this Condition, but substantive progress on the establishment of reference points and control rules for this stock will be needed to enable this Condition to be closed. Work that is being carried out by the WCPFC, and which is due to be presented in 2011 at a workshop on management objectives, should allow this Condition to be closed out.</p>
<b>AAFA Action</b>	<p>During 2010-2011 following the 3<sup>rd</sup> surveillance audit of the AAFA MSC certification for the South Pacific albacore fishery, AAFA has pursued and supported international management of South Pacific albacore in letters to the PFMC and to the Inter-American Tropical Tuna Commission (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"> <li>• Letter to WCPFC, November 10, 2010; Re: Express AAFA support to WCPFC for HMS international conservation and management.</li> <li>• Letter to PFMC, including signatures of AAFA members, dated April 2011; Expresses need for the U.S. to lead discussions towards effective international management of albacore resources and states the AAFA position on possible domestic management measures.</li> <li>• Letter to the WCPFC, dated November 10, 2010 Re: Expresses support and cooperation to WCPFC; encourages the U.S. to continue providing leadership, scientific advice, and financial support to WCPFC</li> <li>• Letter to WCPFC, 2010 requesting observer status for AAFA</li> <li>• 2011 Letter to AAFA members reconfirming AAFA Code of Conduct.</li> </ul> <p><u>Meeting Attendance</u></p> <ul style="list-style-type: none"> <li>• Participated in September 2010 General Advisory Committee (GAC) to U.S. Section to the IATTC.</li> <li>• Participated in September 2010 PFMC Highly Migratory Species (HMS) Management Team and PMFC/Advisory Subpanel. AAFA urged that the U.S. take a more aggressive leadership role regarding Regional Fisheries Management Organization (RFMO) international management of Pacific albacore resources.</li> <li>• Participated in January 19-20, 2011 meeting of the PMFC/HMS Management Team; addressed large number of topics related to the domestic and international management of Pacific albacore resources.</li> <li>• Participated in April 2011 meetings of the PFMC, PMFC/HMS Management Team, and PMFC/Advisory Subcommittee.</li> <li>• Participated in May 25-26, 2011 meetings of IATTC GAC and Scientific Advisory Subcommittee (SAS). Expressed AAFA's support for international management of albacore.</li> <li>• Participated in June 2011 PFMC Highly Migratory Species</li> </ul>

	<p>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.</p> <ul style="list-style-type: none"> <li>• Participated in the 82<sup>nd</sup> 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.</li> </ul>
<b>Observations</b>	<p>The WCPFC Scientific Committee reviewed progress on identifying appropriate reference points for the key target species in the WCPFC at its 2010 meeting. It was noted that Annex II of the 1995 UN Fish Stocks Agreement and Article 6 of the WCPFC Convention provide the legal framework for the application of the precautionary approach through limit reference points. Currently, however, the Commission has not formally adopted any specific reference points but has largely used default MSY-based biological reference points as a target reference point in its evaluation of stock status.</p> <p>While target and limit reference points have yet to be formally adopted by the WCPFC, work plans have been endorsed by the Commission for the Scientific Committee to conduct research for identification of candidate limit reference points for the key target species in the WCPFC. The Scientific Committee recently recommended a three-level hierarchical approach to selecting and setting limit reference points for fishing mortality (F) and Spawning Stock Biomass (SSB) based on decreasing levels of available information (Preece <i>et al.</i> 2011). The first level uses FMSY and SSBMSY but only in the case where a reliable and precise estimate of steepness is available. The second level uses spawner per recruit (SPR) and 20% of SSB<sub>0</sub> for cases in which uncertainty in steepness is high, but the key biological (natural mortality, maturity) and fishery (selectivity) variables are reasonably well estimated. The third level does not include an F-based limit reference point if the key biological and fishery variables are not well estimated, but simply uses a SSB limit of 20% of SSB<sub>0</sub>.</p> <p>Given the uncertainties in some of the key life-history and fishery variables required for either level 1 or level 2 in the suggested hierarchical approach, the Scientific Committee recommended that level 3 (the default SSB depletion option) be used for South Pacific albacore, in general, except where a thorough exploration of model sensitivity and, or, formal Management Strategy Evaluation results are available (SC7-MI-WP-03 Identification of candidate limit reference points).</p> <p><b>Management actions</b></p> <p>The WCPFC Scientific Committee has recommended (WCPFC 2011) that that vessel activity must continue to be managed as per the requirements of CMM 2010-05. The Commission is expected to act on this recommendation at its next meeting in December 2011.</p>
<b>Conclusion</b>	AAFA has continued to advocate the sustainable management of the South Pacific albacore fishery through letter writing, meeting participation and by

	<p>gaining observer or delegation status at international science and management fora. This effort is acknowledged by the assessment team, and we note that progress is being made towards the development of reference points and a control rule for South Pacific albacore. However, the progress is not sufficient for AAFA's Condition of Certification to be closed out in this fourth audit.</p> <p>In preparing for this fourth surveillance audit, and in the knowledge that AAFA was intending to pursue recertification of the South Pacific albacore troll/jig fishery at the same time, Intertek Moody Marine Ltd. wrote to the MSC to propose that the existing Condition on AAFA's South Pacific fishery be carried-over to a new certificate if the fishery was recertified. It was suggested that, in that case, the assessment team would avail of the MSC's new standardised Certification Requirements (MSC 2011) in order to ensure that the revised Conditions on reference points and a control rule were outcome-focused, time-bound, and consistent with other recently certified tuna fisheries. This suggestion was accepted by the MSC, such that although the existing Condition on AAFA's South Pacific fishery cannot be closed at this time, it will be adapted and reissued to meet the most recent MSC guidance in the event that the fishery is recertified.</p>
--	--

Item	Comment
<b>4</b>	<b>Any complaints against the certified operation; recorded, reviewed and auctioned</b>
	No complaints were received against the certified operation in the course of this year's certification.

Item	Comment
<b>5</b>	<b>Any relevant changes to legislation or regulations</b>
	<p>Following the awarding of their MSC certificates, AAFA introduced and implemented its own certificate-sharing programme. AAFA operates under the Californian Fish Marketing Act, and there is a requirement within the "Act" that the certificate-sharing programme be limited to AAFA members.</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 members dropped slightly to 66 vessels.</p>

Item	Comment
<b>6</b>	<b>Any relevant changes to management regime.</b>
	There were no substantive changes reported within this year's annual reporting cycle.

Item	Comment
7	<b>Harmonisation with other relevant fisheries.</b>
	<p>As noted in the conclusion to Item 3, above, in preparing for this fourth audit, and in the knowledge that AAFA was intending to pursue recertification of the South Pacific albacore troll/jig fishery at the same time, Intertek Moody Marine wrote to the MSC. In addition to not closing-out the existing Condition, this was to determine the appropriate course of action to pursue in conducting a harmonisation review with the recently certified New Zealand albacore troll fishery (IMM 2011), which prosecutes the same stock as the AAFA fishery. It was subsequently agreed with the MSC that any harmonisation would be undertaken in AAFA's reassessment process, rather than during this fourth audit. This was determined to be the best course of action given that the AAFA certificate was issued prior to the introduction of the MSC's standardised Fishery Assessment Methodology. As such, a direct comparison of the two assessments at the present time would be very difficult. AAFA is, though, aware of the need to pursue the adoption of reference points and a control rule for the South Pacific albacore fishery, and that any new Conditions would be outcome-focused, time-bound, and consistent with other recently certified tuna fisheries.</p>

Item	Comment
9	<b>Overall Conclusions</b>
	<p>The overall management of the fishery continues to equal or exceed the standard observed during the full assessment.</p> <p>The client has devoted substantial effort and demonstrated significant progress regarding Conditions placed on the certification of the AAFA South Pacific albacore troll/jig fishery. As such, considerable progress is being made towards the development of reference points and an associated sustainable fishery management regime. However, the single Condition on the fishery remains in place.</p> <p>It should be reiterated at this time that the South Pacific albacore stock is currently not overfished nor is overfishing occurring, and current biomass levels are sufficient to support current levels of catch. The absence of reference points and a control rule must, though, be a continuing focus for AAFA, and the Intertek Moody Marine assessment team can confirm that the lack of such decision tools would mean that Conditions of certification would be required in a new certificate if the fishery was recertified. As such, the assessment team is pleased to note that AAFA has confirmed its intent to continue to participate in management and advisory forums and to advocate the development of formalised and documented decision-making management processes on the South Pacific albacore stock.</p> <p>MSC Certification should therefore continue for the final year of this existing certificate, as AAFA's South Pacific albacore troll/jig fishery moves forward through reassessment.</p>

<b>Information Sources:</b>
-----------------------------

Hoyle, Simon (2011). Stock Assessment of Albacore Tuna in the South Pacific Ocean. Scientific Committee Seventh Regular Session, 9-17 August 2011, Pohnpei, Federated States of Micronesia, WCPFC-SC7-2011/SA-WP-06.

Hoyle S. D. & Davies N. (2009). Stock assessment of albacore tuna in the South Pacific Ocean. Scientific Committee, Fifth Regular Session, 10-21 August 2009, Port Vila, Vanuatu. WCPFC-SC5-2009/SA-WP-6.

Hoyle S. D., Langley A. D., & Hampton W. J. (2008). Stock assessment of Albacore tuna in the south Pacific Ocean. Scientific Committee Fourth Regular Session; Nouméa, New Caledonia, Secretariat of the Pacific Community. WCPFC Scientific Committee. WCPFC-SC4-2008/ SA-WP-8a.

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

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

Preece, A., Hillary, R. & Davies, C. (2011). Identification of candidate limit reference points for the key target species in the WCPFC. Scientific Committee, Seventh Regular Session, Commission for the Conservation and Management of Highly Migratory Fish Stocks in the Western and Central Pacific Ocean; Pohnpei, Federated States of Micronesia; 9 August - 17 August 2011. 38 pp.

WCPFC (2011). Summary report (adopted version), Scientific Committee, Seventh Regular Session, Commission for the Conservation and Management of Highly Migratory Fish Stocks in the Western and Central Pacific Ocean; Pohnpei, Federated States of Micronesia; 9 August - 17 August 2011. 166 pp.

### Meetings Conducted

Date	Organisation	Attending
26 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> October 2011	AAFA Intertek Moody Marine Ltd	Mr. Chip Bissell Dr. Rob Blyth-Skyrme

	Intertek Moody Marine Ltd Intertek Moody Marine Ltd PFMC	Dr. Norman Bartoo Dr. Mike Laurs Ms. Marija Vojkovich	
<b>Standards and Guidelines used:</b>  <ol style="list-style-type: none"><li>1. MSC Principles and Criteria for Sustainable Fishing</li><li>2. MSC Fishery Certification Methodology Version 6. September 2006</li><li>3. MSC TAB Directives – all</li></ol>			

**Appendix A**

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

We are pleased to announce that the MSC fishery certification assessment is underway for the AAFA South 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 South Pacific albacore 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:

Dr. Rob Blyth-Skyrme  
E-mail: [rob@ichthysmarine.com](mailto:rob@ichthysmarine.com)  
Website: [www.moodyint.com](http://www.moodyint.com)  
Fax: +44 1332 675020

Intertek Moody Marine  
Merlin House  
Stanier Way  
Wyvern Business Park  
Derby, DE21 6BF  
Telephone: +44 (0) 1332 544663  
Fax: +44 (0) 1332 675020  
Email: [info@moodvint.com](mailto:info@moodvint.com)  
Web Site: [www.moodvint.com](http://www.moodvint.com)

**Appendix B****World Wildlife Fund  
Fisheries**

1250 24<sup>th</sup> St. NW  
Washington, DC 20037-1193  
Main Phone: 202-293-4800  
Fax: 202-223-6971

[worldwildlife.org](http://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