



The Pew Charitable Trusts' Statement During the Third Comment Period of Panel 2 December 2020

The Pew Charitable Trusts is pleased that issues related to east Atlantic and Mediterranean bluefin and north Atlantic albacore management have been largely resolved by Panel 2. However, we remain highly concerned regarding western bluefin tuna negotiations and the ongoing threat of adoption of a TAC associated with a 94% chance of overfishing in 2021. Such a measure would be the opposite of precautionary.

When ICCAT decided to abandon its 20-year biomass-based, rebuilding plan for western bluefin in 2017 in favor of an $F_{0.1}$ approach, it was clear that to be effective, this strategy would require raising and lowering the TAC in response to good or bad recruitment classes, or other factors outside managers' control. ICCAT demonstrated its comfort with this approach when it immediately increased the TAC in response to a relatively positive assessment in 2017, and it should have a similarly rapid response to the concerning assessment this year. Since fishing mortality can be directly managed, this system does not allow for phased reductions in catch in order to be at or below the $F_{0.1}$ level. Thus, we commend those governments calling for an immediate reduction of the TAC to 1785t for 2021, having a nearly 60% likelihood of ending overfishing. These CPCs are honoring ICCAT's commitment to science, not short-term quota implications, as the driver of management decisions.

Regarding the table of western bluefin TAC scenarios provided to the Commission by the SCRS, we respectively disagree with the Panel 2 Chair's characterization that each row of the table is the scientists' advice. The SCRS was specifically asked by the Chair of the Commission to assess the consequences of rolling over the current measure. That line of the table (i.e., Scenario 3) should not be assumed to be their advice but instead a response to the Commission. Additionally, that response demonstrates what would be required in years two and three to end overfishing and return to the $F_{0.1}$ strategy. But the current proposal, PA2-608B, only includes a TAC for 2021 with no indication how the 2022 TAC would be chosen, and thus no consequence for abandoning the $F_{0.1}$ strategy.

Pew strongly urges Panel 2 members to seriously consider the wide-reaching implications of their decision on the western bluefin tuna TAC. A decision by the Commission to allow for near certain overfishing of western bluefin next year would be a failure of management, jeopardizing not only the status of this population but undermining the years of hard work and sacrifice by the Commission and industry to rebuild the bluefin tuna's reputation in the market.

This ongoing lack of consensus on a sustainable path forward for western bluefin management next year also highlights the urgent need for a more precautionary, predictable and stable approach to management. And the ease with which albacore TAC discussions have been agreed by Panel 2 in a virtual setting this year underscores the advantages of a harvest strategies approach. It is therefore imperative that Panel 2 also adopts a TAC this week for 2022, when the management strategy evaluation (MSE) is scheduled to be completed and a management procedure (MP) will be adopted. Then, if ICCAT sticks to its schedule, the MP can be used to set a TAC in 2023 that best achieves the Commission's agreed

management objectives for western bluefin while, while preventing the serious impasse the Commission is now experiencing.