

PERSPECTIVES OF THE HAWAII LONGLINE ASSOCIATION FOR THE RFMOs' BYCATCH WORKSHOP

The Hawaii Longline Association (HLA) appreciates this opportunity to provide its perspectives on the issue of bycatch of seabirds, sea turtles, sharks, marine mammals, juvenile tuna, or non-target finfish in tuna fisheries and how to address this issue.

There are two Hawaii longline fisheries: one is a shallow set fishery that targets swordfish, and the other is a deep set fishery that targets bigeye tuna. Together, the fisheries are managed through U.S. regulations developed by the Western Pacific Fishery Management Council (Council) and implemented by the National Marine Fisheries Service (NMFS) under the Magnuson-Fishery Conservation and Management Act; and through regulations implemented by NMFS to carry out conservation and management measures adopted by the Inter-American Tropical Tuna Commission and the Western and Central Pacific Fisheries Commission. Observer data (which confirm logbook data) indicate that the principal target species are swordfish and bigeye tuna, but substantial revenue is derived from the associated catch and sale of yellowfin tuna, mahimahi, albacore tuna, striped marlin, and opah. While large numbers of sharks and other cartilaginous fish are taken, most (ca. 95%) are released alive. Blue shark is by far the most commonly caught and discarded species; others are lancetfish, shortfin mako sharks, snake mackerel, and remora. Lancetfish are mostly discarded dead, but other species are mostly discarded alive. Together, these species accounted for more than 90% of total discarded species in the years 2004-2007. There is little bycatch of juvenile fish. Shark mortality has not been a significant issue since 2002, when shark finning (i.e., retention of fins only) by U.S. vessels was prohibited in the Pacific Ocean. Interactions with marine mammals are occasionally a problem (17 events in 4,600 sets 2005-2008), principally as cetaceans take bait off the longline hooks or deplete the catch of target species.

The principal bycatch issues in the fisheries have been the incidental take of sea turtles, seabirds and false killer whales. These issues have been, and are currently, addressed through Federal regulations. In fact, the Hawaii longline fleet has a long history of working with the Council and NMFS to address these critical bycatch issues. Our members have demonstrated that changes in fishing gear and fishing practices can result in very significant reductions in the number of protected species interactions and in the mortality resulting from such interactions without destroying the economic viability of the fisheries. Turtle take rates have dropped about 90% since the late 1990's, seabird take rates have dropped about 67% since the initial imposition of regulations in 2001 and mitigation of false killer whale takes are currently being addressed through a Federally designated Take Reduction Team composed of members from non-governmental organizations, universities, industry and NMFS. These achievements have been well documented in scientific literature as well as in fishery management documents published by the Council and NMFS.

The conservation and management measures limiting the Hawaii longline fisheries include:

- Limited fleet size based on up to 165 vessels qualifying for permits in 1994

- Limited vessel size of up to 101 feet based on initially qualifying vessels

- Area closures around the main Hawaiian Islands to protect local fishers and incidentally protect shore-associated marine mammals and seabirds

Area closures around the Northwestern Hawaiian Islands initially to protect Hawaiian monk seals and incidentally protect other shore-associated marine mammals and seabirds

Automated vessel monitoring units to ensure full tracking of vessel movements and activity

Logbooks to record all catch and effort

Observers on 100% of all shallow set swordfish trips and about 20% of deep set tuna trips to record catch, effort, protected species interactions and other data and to obtain biological data and samples to the extent practicable

Gear (especially circle hooks) to minimize sea turtle takes and reduce subsequent mortality, and handling and release requirements to maximize the potential for survival of incidentally taken and released turtles

Gear and techniques to minimize interactions with seabirds

Shoreside monitoring of landings to corroborate logbook data and obtain additional biological and fishery data

The results of this comprehensive management and monitoring program demonstrate that the longline fisheries – shallow set and deep set – can be prosecuted with minimal adverse impact on protected species such as sea turtles, marine mammals and seabirds. In fact, the Hawaii longline fisheries have been evaluated in relation to the principles and objectives of the FAO Code of Conduct for Responsible Fisheries. The fisheries earned a score over 90; this demonstrates that the fisheries are sustainable, are under sound management, and address major bycatch concerns as well as conservation of the target species. If all longline fisheries had comparable performance, sea turtle, marine mammal and seabird bycatch would not be such high visibility or controversial issues.

HLA agrees that bycatch prevention, reduction and mitigation in tuna fisheries is very important and believes that the RFMOs should be more proactive in the implementation of conservation measures to protect sea turtles, marine mammals and seabirds. The evidence is very clear that the use of circle hooks and mackerel-style bait results in significant reductions in sea turtle interactions and mortality. Seabird take prevention and mitigation measures such as tori lines and side setting are very effective in reducing the likelihood of seabird hooking or entanglement during longline fishing. The evidence further confirms that well designed observer programs are a critical element to ensure that there is good documentation of the fisheries which is necessary to evaluate of the effects and effectiveness of conservation and management measures. Importantly, the evidence is also clear that the lack of proactive measures is likely not only to result in the unnecessary mortality of these sensitive species; it is likely also to result in pressures from non-fishing entities to reduce market availability or access for fleets that are not sufficiently controlled. To the extent that measures are not broadly applied, there is a high probability of a "transfer effect;" that is, fishing effort will increase in uncontrolled fisheries (to try to capture markets which controlled fisheries cannot fully satisfy) and decrease in controlled fisheries. The ultimate consequence is increased take and mortality of the species that most need protection and, in the U.S., the potential for limiting imports of fish that are not taken in accordance with U.S. fishing

standards. HLA believes that RFMOs should recognize and reward good fishery practices and strictly limit or restrict bad fishery practices.

It is important as well to address the significant juvenile bycatch problem associated with purse seine fishing, especially fishing on fish aggregating devices. The large catches of juvenile tuna have a large and generally adverse effect on the stocks, at least with respect to yield from the stocks. It is likely that there would be a net addition to total catch if the average size of fish caught were increased (as occurred in the western Pacific in 2009). In addition, the value of fish catches can be increased if catches consist of larger fish which could command a higher price per pound.

HLA offers the following specific recommendations for consideration:

1. RFMOs should require full logbook reports and observer programs for all longline fisheries in all regions. It is critical to know what is being caught and where, and the nature of any interactions with protected species, so that the effects and effectiveness of conservation and management measures can be evaluated and improved.
2. RFMOs should at the least promote the voluntary use of gear and techniques that are proven to be effective in reducing or mitigating takes of protected species (e.g., sea turtles, marine mammals and seabirds), though it is preferable to mandate these measures for all areas and fleets, noting the need for regional consistency across RFMO lines as appropriate.
3. RFMOs and parties should increase and accelerate research on gear and techniques that will prevent or mitigate the catch and mortality of juveniles.
4. RFMOs should establish an inter-RFMO website to quickly disseminate data and results of research and of assessments of the effects and effectiveness of conservation and management measures addressing tuna stocks as well as stocks of other species taken in tuna fisheries. Information is key to developing approaches that will reduce or mitigate bycatch in tuna fisheries; the information base should include reports on the nature and magnitude of bycatch by region and the measures in place to reduce or mitigate bycatch.
5. RFMOs should evaluate all fisheries in their jurisdiction relative to the FAO Code of Conduct and use those evaluations as a basis for making changes in conservation and management measures to ensure broad and consistent management throughout their area of competence; good fishery practices should be rewarded in appropriate management decisions, including allocations of fish or fishing opportunities.

HLA thanks NMFS for providing this opportunity to comment for this important workshop.