

ATTN: NOAA,

I am writing on behalf of MSC certified [US Pacific Tuna Group Purse Seine FSC and FAD Set Fishery](#) and the Fishery Improvement Project Fishery [Pacific Ocean Tropical Tuna – Purse Seine \(US Pacific Tuna Group\)](#) in support of urgently needed tuna management measures in the Eastern Pacific Ocean, a region for which your government serves as an important leader as a member of the Inter-American Tropical Tuna Commission (IATTC).

We are concerned with the status of the tuna stocks in the Eastern Pacific Ocean and their effective management. We operate in this region and the sustainability of these stocks is integral to not only our business, but also to the overall marine environment.

The US Pacific Tuna Group strongly urges The United States to ensure the IATTC acts in August at the Annual Meeting of the IATTC Commission to:

1. Compliance Processes

Establish a work plan with timelines to further strengthen the Committee for the Review of Implementation of Measures' procedures and outcomes, including developing by 2024 a hierarchy of infractions and a scheme of responses to improve compliance.

2. Effective Management Procedures (Harvest Strategies)

- Adopt interim reference points for skipjack tuna.
- Establish and convene a scientist-manager dialogue group to advance management procedures for other tuna stocks.

3. FAD Management

- Require fully non-entangling fish aggregating device (FAD) designs without netting or meshed materials.
- Adopt the definition of “biodegradable” proposed by the FAD Working Group and establish a timeline as is practicable for transition to 100% biodegradable FADs.

4. Tuna Stock Conservation

Ensure all CPCs implement Resolution C-21-04 fully so that the fishing mortality for bigeye and yellowfin does not exceed the average fishing mortality during 2017-2019.

5. Bycatch Mitigation & Shark Protections

- Amend Resolution C-05-03 to require that all retained sharks be landed with fins naturally attached without exceptions.

6. Electronic Monitoring and Reporting & Observer Coverage

- Endorse the recommendations of the IATTC Staff on Electronic Monitoring (EM).
- Establish a fleet-wide observer program (human or electronic or a combination) for class 1-5 purse seine vessels.

As a member of The US Pacific Tuna Group engaging in proactive tuna fisheries improvement activities in the Eastern Pacific Ocean, we urge you to ensure that the government of The United States fully supports action on the above issues at the Meeting of IATTC Commission this year, and that your government's positions will testify to your support for addressing these issues.

The US Pacific Tuna Group looks forward to the continued leadership of the United States in the Eastern Pacific Ocean, a region rich in tuna resources that need continued science-based conservation and management.

Thank you for your attention in this matter.

Sincerely,

Charles Horsnell, Key Traceability
MSC and FIP coordinator, on behalf of the US Pacific Tuna Group