



Best Available Scientific Information doesn't support expanding the PRIA MNM

No benefit to Coral Reefs

- Protection of coral reefs, nearshore habitats, and deep-water precious corals are already well protected within the 0-50 nm PRIA Marine National Monument (MNM).

No conservation benefit to seabirds

- Seabirds that nest on the PRIA are migratory and forage well beyond the waters of the US EEZ.
- There is no scientific information indicating that purse seine and longline fishing in the PRIA are impacting seabird populations, either through direct interactions or indirectly by impacting availability of seabird forage.

No conservation benefit to tuna and other HMS stocks

- Expanding from 0-50nm will not benefit the stock status of highly migratory species such as tuna which move in and out of the US EEZ to adjacent high seas and Kiribati EEZ
 - Western high seas pocket closure under WCPFC CMM 2008-01 is good example of the large area closures having no change to tuna stock status, whereby fishing effort and catches shifted into other areas of high seas and EEZs in the WCPO without any reduction in fishing mortality.
- Bigeye tuna stocks in the WCPO are predicted to shift more to east as a result of climate change impacts.
- US longline fishermen will be unable to access bigeye stocks in the equatorial PRIAs if these are totally closed to fishing. This puts them at a disadvantage relative to other Pacific Island Nations which will maintain their EEZs open to fishing.

Little conservation benefit to sharks

- There are no directed shark fisheries occurring in the PRIA and the US Pacific Islands
- Purse seine fishing on FADs sometimes also involves the incidental catch of silky and oceanic white tip sharks; however there are existing WCPFC and domestic measures to prohibit retention of these species
- The Hawaii longline fleet incidentally catches sharks, predominantly blue sharks, of which over 95% are released alive
- Oceanic sharks are highly migratory and prohibiting fishing within the US EEZ around the PRIA will have little benefit on stock status of depleted shark species

Negative impacts on US purse seine fleet and Hawaii longline fleet

- The US EEZ around Howland, Baker, Jarvis Islands are fished by the US purse seine fleet, especially during El Nino episodes
 - In El Nino years (e.g. 1998), approximately 20% of US purse seine fishing effort occurred in the US EEZ around the PRIA (predominately in the waters around Howland/Baker).
 - The western warm pool shifts several thousand kilometers, with skipjack following the eastward movement of preferred habitat
 - El Nino frequency is predicted to increase in future as a result of climate change, indicating the US EEZ will be more important in terms of fishing area in future
 - WCPFC is reducing high seas fishing effort, and closing high seas completely under the WCPFC has been proposed.
 - The US should not close its waters within the PRIA, as these areas will be important to the US tuna industry
- The US EEZ around Palmyra outside of 50 nm is fished by the Hawaii longline fleet provides an important area for fishing for bigeye tuna without competition from foreign fleets
- As much as 12% of the annual Hawaii longline catch was produced out of the EEZ around Palmyra in early 2000s.

Negative impacts to Territory of American Samoa

- The US purse seine fleet is currently facing record fees under the South Pacific Tuna Treaty, which means the PRIA offer available fishing areas, especially for US seiners that operate out of American Samoa and predominately in the central Pacific.
- American Samoa's limited economy is highly dependent on tuna processing, and any negative impacts to the US tuna vessels that operates out of American Samoa will likewise have a negative impact to the American Samoa economy.

In Summary

- No net conservation gains beyond those experienced since the establishment of the PRIAs Marine National Monuments
- Potentially large negative effects to US fisheries, and the US fishing industry for EEZ closures which are largely cosmetic.