

**Western
Pacific
Regional
Fishery
Management
Council**

August 15, 2014

The President
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Dear Mr. President:

The Western Pacific Regional Fishery Management Council requests that the Administration abandon its plan to expand the Pacific Remote Islands Marine National Monuments (PRIMNM) or, if expansion is inevitable, that commercial fishing be allowed to continue within the PRIMNM beyond the existing 50 nm boundary.

In addition to the traditional connections with the Pacific Islands it is important to consider that since WWII these islands, and the now independent Trust Territories, solidified US interests in Oceania. These interests were won at an extremely high cost in New Guinea (Milne Bay), Solomon Islands (Guadalcanal), Kiribati (Tarawa) and Palau. In peacetime, the US presence in the region has primarily been through its purse seine fishery via the South Pacific Tuna Treaty (SPTT).

The Treaty has been the main conduit of financial aid to the independent Pacific Islands Countries (PICs) providing \$21 million annually in funds shared by all the independent Pacific Islands Forum countries, which is in addition to the payments for fishing days. However, the US role and influence in the region will be vastly undermined if we voluntarily surrender our rights to fish within our own EEZ waters. Moreover, the US is being surpassed by China in the provision of foreign aid to the region. China now dominates Papua New Guinea's canning industry, an industry that directly competes with the American Samoa canneries.

A great deal of press and public attention has been paid to the Phoenix Islands Protected Area (PIPA) and the pronouncements by Kiribati President Anote Tong. However, the economics of tuna fishing in Kiribati suggest that in the EEZ around the Phoenix Islands, it will be business as usual when it comes to tuna fishing. About 70% of the Kiribati government revenue is derived from tuna (50% from access; 20% from joint venture dividends). It is highly improbable that Kiribati will close PIPA without compensatory economic financing equivalent to revenue generated from fishing. The Cook Islands announcement to turn their southern EEZ into a marine park makes clear that they will continue to permit tuna fishing within the park boundaries. Thus PIC administrations in Kiribati and elsewhere like Palau may have vastly different ideas about the meaning of closures, leaving the US closures in the PRIMNM, as the only true fishery closures. This will have a serious impact on US fishermen.

These same countries that are frequently named as supporting conservation are, like all other PICs, rapidly developing their longline and purse seine fisheries with the active support of their governments. The US, however, seems determined to prevent the development of US tuna fisheries in the Western

Pacific Region. The US fisheries are already the world's most stringently managed and have served globally as icons for management excellence. This proposal will instead turn our fisheries into examples of how to actively discourage development and renewal.

Further, the continuity of American Samoa as a major fishery port and fishing hub continues to be uncertain. The canneries in American Samoa depend for a large part on the US purse seine fishery for their supply of tuna. However, the South Pacific Tuna Treaty must be reviewed this year. To date the prospect of a settlement looks slim. If there is no settlement, US vessels without US hulls will be reflagged or be sold. Approximately one dozen US vessels, with US hulls, will need the offshore EEZ waters around the PRIMNM in which to fish. The impacts to the American Samoan economy from such a scenario will be severe and would potentially affect hundreds of jobs in the territory. This situation will be exacerbated further if the offshore EEZ waters around the PRIMNM are no longer available to the US fleet.

The arguments outlining the alleged benefits of the expansion of the PRIMNM are contained in a highly questionable document written for the most part by conservation advocacy groups based in Washington. It presents a highly skewed set of arguments for the monument expansion. It is deeply puzzling that none of the hundreds of scientists at your disposal in the National Marine Fisheries Service (NMFS) were consulted about the purported benefits of this action. Many of these scientists within NMFS are world famous leaders in their disciplines.

We can only imagine they were not consulted because they would likely have pointed out the following about the proposed expansion, as detailed further in the attached documents:

No additional protection of coral reefs

- Nearshore habitats and deep-water precious corals are already well protected within the 0-50 nm waters of the PRIMNM.
- The Western Pacific Regional Fishery Management Council also has a Fisheries Ecosystem Plan for the coral reef and nearshore habitats of the Pacific Remote Island Areas.

No conservation benefit to the already existing 12 million seabirds

- Seabirds that nest on the PRIMNM 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 offshore US EEZ waters of the PRIMNM 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 Western and Central Pacific Fisheries Commission (WCPFC) Conservation and Management Measures 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 Western and Central Pacific Ocean (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 PRIMNMs if these are totally closed to fishing. This puts them at a disadvantage relative to other PICs which will maintain their EEZs open to fishing.
- The Western Pacific Regional Fishery Management Council also has a Pelagic Fishery Ecosystem Plan for managing and conserving tuna and tuna like species in all parts of the Western Pacific including the offshore US EEZ waters of the PRIMNM.

Little conservation benefit to sharks

- There are no directed shark fisheries occurring in the PRIMNM and the US Pacific Islands.
- As noted above the Council's Pelagic Fishery Ecosystem Plan also covers pelagic sharks species in all parts of the Western Pacific including the offshore US EEZ waters of the PRIMNM.
- Purse seine fishing on Fish Aggregating Devices 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 PRIMNM 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 and 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 PRIMNM (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 PRIMNM, 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 15% of the annual Hawaii longline catch was produced out of the EEZ around Palmyra in early 2000s.

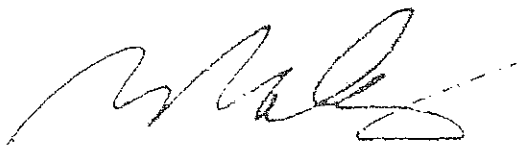
Finally, Mr. President, you will recall the importance of high quality fresh fish to Hawaii. Seafood consumption by the people of Hawaii is three times the national average. Further, the Hawaii longline fishery, though small by US standards is now the pre-eminent pelagic longline fishery in the US,

supplying 90% of the US domestic landings of bigeye tuna and 50% of the yellowfin tuna and swordfish. Honolulu lies in the middle ranks of the US fishing ports in terms of volume of fish landed but is regularly within the top 5 fishing ports in terms of landed value.

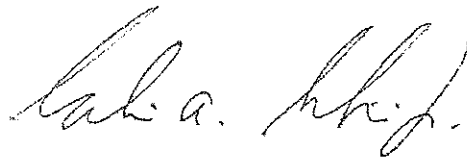
You have it within your power at the stroke of a pen to expand what are essentially paper parks, but that stroke of a pen will have catastrophic consequences for US fisheries in our region and the ports of Honolulu and American Samoa. Do you really want your legacy to be the President that destroyed the US fishing industry in the Western Pacific?

For these reasons we respectfully ask you to leave the PRIMNM as it is or, if it is expanded, to allow commercial fishing to continue within its 50-200 nm boundaries.

Most Respectfully



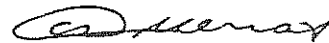
Arnold Palacios
Chair



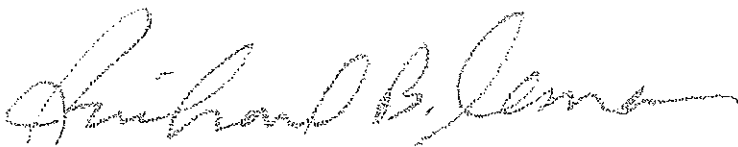
Edwin Ebisui
Vice Chair (Hawaii)



William Sword
Vice Chair (American Samoa)



Michael Duenas
Vice Chair (Guam)



Richard Seman
Vice Chair (Commonwealth of the Northern Mariana Islands)

Attachments:

1. Best Available Scientific Information Does Not Support an Expansion Of The Pacific Remote Islands Marine National Monument

2. Consensus Statement from the Ad-Hoc Committee on the Socio-Cultural and Economic Impacts of Expanding the Pacific Remote Islands Marine National Monument (PRIMNM)