

**Assessments under CMM 2013-06 for Proposed and Potential Provisions of a  
New Conservation and Management Measure for the Tropical Tuna Stocks**

**Prepared by**

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**for the  
Eighteenth Regular Session of the  
Western and Central Pacific Fisheries Commission**

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## 1. Introduction

This document contains information and assessments intended to be used by the Commission as it designs a new conservation and management measure for the tropical tuna stocks. In particular, the information can be used by the Commission to assess the impacts of various potential provisions on particular small island developing states, territories, and possessions (collectively “SIDS”) and design a measure that avoids transferring a disproportionate burden of conservation action onto any SIDS.

Two sets of information are included: (1) the “background” section contains information about the characteristics and economies of the three U.S. territories that participate in the Commission pursuant to Article 43: American Samoa, Commonwealth of the Northern Mariana Islands (CNMI), and Guam. Under Article 30, the special requirements of these small island developing territories are to be given the same recognition as those of small island developing states. The information in this section can be used to help assess impacts on these three SIDS from CMMs generally; and (2) using the framework in CMM 2013-06, the “assessments” section contains information about the expected impacts on SIDS of particular provisions that have either been proposed by the United States (in its submission to the Chair of October 21, 2021), or that might be included in the Chair’s consultative draft CMM and/or proposed, or promoted by other CCMs.

The fishery development aspirations and needs of each of the three U.S. territories are addressed through Marine Conservation Plans (MCPs) that are developed by each of the respective Governors.<sup>1</sup> These MCPs identify conservation and management objectives and prioritize marine conservation projects for the purpose of improving fishery monitoring, building local capacity, and ensuring food security for island communities through sustainable fisheries. The MCPs are updated every three years. Projects associated with these MCPs are primarily funded through specified fishing agreements with U.S. longline fishing vessels. U.S. domestic regulations authorize specification of catch limits of longline-caught bigeye tuna for the three territories.<sup>2</sup> Each territory may allocate a portion of that limit to U.S. longline fishing vessels based out of Hawaii through specified fishing agreements. Paragraph 9 of CMM 2018-01 and 2020-01 requires the territories to notify the Commission of the agreements.

Guam and CNMI are members of the Micronesia Islands Forum (MIF),<sup>3</sup> whose membership also includes each of the four states of the Federated States of Micronesia, the Republic of the Marshall Islands, and Palau. The goal of the MIF is to plan for and enhance the quality of life throughout its member states while preserving each state’s diverse culture. The MIF is critical for bridging shared economic and social objectives, which may include fishery aspirations. In 2019, the MIF reaffirmed the commitment of each of the participants, on behalf of their people

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<sup>1</sup> The MCPs for American Samoa, CNMI, and Guam are available, respectively, at:  
<https://www.wpcouncil.org/fisheries/american-samoa-archipelago/>

<https://www.wpcouncil.org/fisheries/northern-mariana-islands-mariana-archipelago/>

<https://www.wpcouncil.org/fisheries/guam-mariana-archipelago/>

<sup>2</sup> <https://www.ecfr.gov/current/title-50/chapter-VI/part-665/subpart-F/section-665.819>

<sup>3</sup> <https://www.mifsecretariat.org/>

and their governments, to establish closer ties, strengthen cooperation, and agree on initiatives for the benefit of members and the entire Micronesia Region.

## **2. Background**

### **2.1 American Samoa**

American Samoa consists of five main islands and two atolls covering approximately 77 square miles of land. The portion of the U.S. EEZ around American Samoa, which is 156,136 square miles in size, is entirely surrounded by EEZs of neighboring Pacific Island nations - there is no direct access to the high seas. Article 10 of the WCPF Convention recognizes these special circumstances as one of the factors the Commission shall take into account in developing criteria for the allocation of total allowable catch or fishing effort (Article 10.3(h)).

Tuna fishing and processing have long been an important part of American Samoa's economy, with offloading from longline vessels starting in the 1950s and offloading from purse seine vessels starting in 1970. The first cannery was built in 1949, and a second was constructed in 1963. Currently, one cannery operates in American Samoa.

American Samoa's economy is heavily dependent on the well-being of the tuna cannery and the American Samoa-based longline and purse seine fleets. Exports of canned tuna comprise the vast majority of exports from American Samoa, and imports of fish and materials for the cannery are key imports to American Samoa. Employment in the cannery alone represents approximately 24 percent of private employment in American Samoa, and other sectors of the tuna industry provide substantial additional jobs. The cannery provides jobs not only to citizens of American Samoa, but also to many nationals of other Pacific Island countries, particularly Samoa, Niue, Tokelau, Fiji, and Tonga. Port calls by longline and purse seine vessels are important for supplying fish for processing to the cannery, and also for supporting the local economy through purchases of fuel, supplies and services.

Almost 85 percent of the purse seine vessels offloading in American Samoa are from U.S. flagged vessels, and the reduction in the size of the U.S. fleet in recent years has resulted in a significant decline in landings to the cannery in American Samoa. U.S. vessels recently reflagged to other nations - many to Pacific Island nations - for various reasons, including economic conditions and regulatory requirements, which has made operating conditions less favorable for the American Samoa-based purse seine fleet. In addition, some vessels have shifted operations to the eastern Pacific. The reduction in size of the U.S. purse seine fleet, coupled with shifting fleet operations, has been to the detriment of American Samoa, as some of these vessels are no longer operating in the waters surrounding American Samoa or offloading in American Samoa. The reduction in port calls to American Samoa has resulted in substantial economic losses to American Samoa.

American Samoa also has a longline fleet that primarily targets albacore and catches other pelagic species such as yellowfin and skipjack. This fleet operates predominantly within the U.S. EEZ. In 2020, 11 longline vessels fished, and participation in this fleet has been declining over

time as low catch rates have impacted the profitability of this fleet. Recently some vessels in the fleet have tried jigging for albacore.

Finally, American Samoa has a small-scale troll fleet that fishes entirely within the portion of the U.S. EEZ around American Samoa, primarily for skipjack and yellowfin tuna.

### The Community

American Samoa has a population of nearly 50,000, 84 percent of which are Samoan and 3 percent of which are other Pacific Islanders.<sup>4</sup> American Samoa's culture is based around *aiga* (family). American Samoa is closely connected to Samoa. For example, 84 percent of cannery workers are Samoa nationals,<sup>5</sup> and fathers of 53 percent of the population were born in Samoa. Fifty-eight percent of the population lives below the U.S. poverty line.<sup>6</sup>

### The Economy<sup>7</sup>

Raw material for the cannery dominates imports to American Samoa. Total imports are valued at about \$712 million per year.<sup>8</sup> Fish for processing contributes about 44 percent of the value of all imports, and tin plate for cans contributes another 1.4 percent.<sup>9</sup>

Cannery products dominate American Samoa's exports. Total exports are valued at about \$353 million per year, with canned tuna making up 99.5 percent of the total value of exports.<sup>10</sup>

U.S. purse seine vessels offloaded an average of 75,000 mt of tuna per year in Pago Pago from 2017-2020.<sup>11</sup> However, in 2021, less than 30,000 mt of tuna was delivered to Pago Pago through October, which is a decline of more than 60 percent from previous years.

Tuna deliveries to Pago Pago by purse seiners averaged just under 100,000 mt each year in 2017-2019.<sup>12</sup> In 2017-2019, there were 247 purse seiner calls at Pago Pago, each representing about \$400,000 in local purchases, averaging about \$33 million per year. However, there has been a steep downturn in port calls. Through August of 2021, there were only 35 such calls.<sup>13</sup> This reduction is expected to result in an economic loss for the year of about \$20 million.

The tuna industry brings other, indirect, economic benefits to American Samoa. For example, due to economies of scale, the large economic footprint of the cannery and associated sectors moderate the costs of energy and freight for American Samoa. It has been estimated that loss of

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<sup>4</sup> American Samoa Statistical Yearbook 2018 and 2019, American Samoa Department of Commerce

<sup>5</sup> Starkist

<sup>6</sup> United States Government Accountability Office: [GAO 20-467](#)

<sup>7</sup> American Samoa Statistical Yearbook 2018 and 2019, American Samoa Department of Commerce

<sup>8</sup> American Samoa Statistical Yearbook 2018 and 2019, American Samoa Department of Commerce

<sup>9</sup> American Samoa Statistical Yearbook 2018 and 2019, American Samoa Department of Commerce

<sup>10</sup> American Samoa Statistical Yearbook 2018 and 2019, American Samoa Department of Commerce

<sup>11</sup> U.S. Coast Guard and NOAA Fisheries. Distant Water Tuna Fleet. Report to Congress 2018-2021

<sup>12</sup> American Samoa Port Administration

<sup>13</sup> American Samoa Port Administration

the tuna industry would increase energy and freight costs in American Samoa by about 30 percent.<sup>14</sup>

### Employment<sup>15</sup>

Total employment in American Samoa is about 16,783 (private and government). Private sector employees number 8,055.<sup>16</sup> Eighty-four percent of them, or 7,407 people, fill positions in the tuna industry, with about two non-cannery jobs for every cannery employee.<sup>17</sup> However, employment in the cannery declined by about 30 percent this year compared to 2020, according to cannery officials.

### Purse Seine Fleet

About 85 percent of the purse seiners calling at Pago Pago are U.S. flagged,<sup>18</sup> reflecting the high degree of dependence of the cannery on U.S.-flagged vessels. Similarly, the WCPO U.S. purse seine fleet is strongly associated with American Samoa, with about 58 percent of offloads occurring at Pago Pago.<sup>19</sup>

The American Samoa-based purse seine fleet traditionally fishes in waters near American Samoa, including in the waters of Cook Islands, Kiribati, Tuvalu, Tokelau, and the United States, and on the high seas.

The number of U.S. flag purse seiners operating in the WCPO declined from 40 vessels in 2015 to 14 vessels in 2021, with many moving to Pacific Island flags. This decline is due to economic and regulatory conditions. These factors also have resulted in the remaining vessels tending to shift fishing operations to the eastern tropical Pacific.

### Regional Connections

American Samoa employs nationals from Samoa, Niue, Tokelau, Fiji, and Tonga. More than 87 percent of American Samoa's population are Pacific Islanders. American Samoa imported \$56.9 million worth of goods from Oceania in 2018.<sup>20</sup> The cannery in American Samoa helps to provide food security for the region.

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<sup>14</sup> Estimate by American Samoa Chamber of Commerce

<sup>15</sup> American Samoa Statistical Yearbook 2018 and 2019, American Samoa Department of Commerce

<sup>16</sup> American Samoa Statistical Yearbook 2018 and 2019, American Samoa Department of Commerce

<sup>17</sup> United States Government Accountability Office: [GAO 20-467](#)

<sup>18</sup> American Samoa Port Authority

<sup>19</sup> Average of 2020 and 2021; NMFS unpublished data

<sup>20</sup> United States Government Accountability Office: [GAO 20-467](#)

## 2.2 Commonwealth of the Northern Mariana Islands

The Commonwealth of the Northern Mariana Islands (CNMI) is composed of 14 islands in the Marianas Archipelago with a landmass of 184 square miles. The portion of the U.S. EEZ around CNMI is 292,712 square miles in size. CNMI has a population of almost 54,000, and its main industries are tourism-related. Fifty-two percent of CNMI residents live below the U.S. poverty line. Citizens of the Freely Associated States (FAS) under the Compact of Free Association with the United States, which include the Federated States of Micronesia, the Republic of the Marshall Islands, and Palau, comprise about 5 percent of the CNMI population. CNMI reported \$9.8 million in expenditures associated with FAS citizens.<sup>21</sup> The 2016 unemployment rate in CNMI was 14 percent - nearly four times greater than that of the United States as a whole (4.7%), and nearly four times higher than that of Palau (4.2%, 2005 estimate), but lower than unemployment rates in Republic of Marshall Islands and Federated States of Micronesia.<sup>22</sup> Approximately 10,000 to 22,000 temporary workers from neighboring Asian and Pacific Island nations, including 2,535 workers from FAS,<sup>21</sup> sought employment in CNMI from 2011 to 2017, many of which are engaged in fishing or fishing related industries.<sup>22</sup>

Historically, U.S. purse seine vessels transshipped and longline vessels were based in CNMI, but currently troll vessels are the only commercial fishing operators for pelagic fish in CNMI primarily targeting skipjack and yellowfin. CNMI has significant fisheries development potential and aspirations, as described in its MCP.<sup>1</sup> MCP objectives for CNMI include: (1) improve fisheries data collection and reporting; (2) conduct resource assessment, monitoring, and research to gain a better understanding of marine resources and fisheries; (3) conduct enforcement training and monitoring activities to promote compliance with federal and local mandates; (4) promote responsible domestic fisheries development to provide long-term economic growth and stability and local food production; (5) conduct education and outreach, enhance public participation, and build local capacity; (6) promote ecosystem approach to fisheries management, climate change adaptation and mitigation, and regional cooperation; and (7) recognize the importance of island cultures and traditional fishing practices in managing fishery resources and foster opportunities for participation.

The portion of the U.S. EEZ around CNMI and Guam spans more than 12 degrees of latitude, encompassing regions with relatively low depletion for skipjack tuna<sup>23</sup> and bigeye tuna,<sup>24</sup> which underscores the potential for viable tuna fisheries. In addition to the fishing grounds adjacent to the emergent islands, a western chain of seamounts runs the length of the Mariana Archipelago. This seamount chain likely provides upwelling of nutrients that support a range of commercially important bottomfish and pelagic species. CNMI's local tourism market, coupled with its close

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<sup>21</sup> United States Government Accountability Office: [GAO 20-491](#)

<sup>22</sup> Ayers, A.L. 2018. The Commonwealth of the Northern Mariana Islands Fishing Community Profile: 2017 Update. NOAA Tech. Memo. NMFS-PIFSC-66 57 p.

<sup>23</sup> Vincent, M., Pilling, G., and J Hampton. 2019. Stock assessment of skipjack tuna in the WCPO. 15th Regular Session of the WCPFC Scientific Committee, Pohnpei, Federated States of Micronesia.

<sup>24</sup> Ducharme-Barth, N., M. Vincent, J. Hampton, P. Hamer, P. Williams, and G. Pilling. 2020. Stock assessment of bigeye tuna in the western and central Pacific Ocean. 16th Regular Session of the WCPFC Scientific Committee, Virtual Meeting. SC16-SA-WP-03.

proximity to Guam and large Asian markets, make responsible fisheries development a key area for economic growth. Significant foreign investment is currently occurring in Saipan with the development of several new hotels and gambling centers. In order to meet local demand, CNMI's bottomfish and pelagic fisheries require development. CNMI fisheries development needs include longline vessel capacity, large-vessel docking space, fish processing and cold storage facilities, and training in fish handling and Hazard Analysis Critical Control Point (HACCP) protocols.

### 2.3 Guam

Guam is the southernmost island in the Mariana Archipelago, with a landmass of 212 square miles. The portion of the U.S. EEZ around Guam is 85,523 square miles in size. Guam has a population of almost 169,000, of which 22 percent live below the U.S. poverty line. Thirty-seven percent of Guam residents are indigenous Chamorro, 33 percent are Asian (including Filipinos, Koreans, Chinese, and Japanese), and 11 percent are in ethnic groups originating from the Freely Associated States of Palau, Federated States of Micronesia, and Republic of the Marshall Islands. Guam reported \$147 million in costs associated with providing public services to FAS migrants in 2017, for a total of \$1.2 billion estimated costs from 2004 through 2017.<sup>21</sup> The fishing community in Guam is composed of at least 17 percent individuals from FAS nations and 7 percent Filipino.<sup>25</sup> The main industries of Guam are tourism and the military, while fisheries remain an important contributor to food security and culture.

Historically, U.S. purse seine and longline vessels were based out of Guam, but currently the troll fleet, which targets skipjack and yellowfin, is the only commercial pelagic fishery in Guam. Transshipment of fish from foreign vessels also occurred in Guam, but transshipments in Guam have not occurred for some time.

Due to Guam's tourism and military economy and diverse spectrum of resident ethnicities, local demand for seafood is high. Guam's excellent harbor facilities and local infrastructure could support local fisheries development. Existing challenges include a relatively small area of EEZ around Guam and the lack of fisheries training programs. Reducing limitations to fishery development are highlighted in Guam's MCP,<sup>1</sup> which specifies the following priorities: (1) fisheries resource assessment, research, and monitoring; (2) effective surveillance and enforcement mechanisms; (3) promote ecosystems approach to fisheries management, climate change adaptation and mitigation, and regional cooperation; (4) public participation, research, education and outreach, and local capacity building; (5) domestic fisheries development; and (6) recognizing the importance of island cultures and traditional fishing practices and community based management.

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<sup>25</sup> Allen, S. and P. Bartram. 2008. Guam as a Fishing Community. Pacific Islands Fish. Sci. Cent., Natl. Mar. Fish. Serv. NOAA, Honolulu, Pacific Islands Fish. Sci. Cent. Admin. Rep. H-08-01, 61 p.

### **3. Assessments**

#### **3.1 Management objectives**

The general and stock-specific management objectives proposed by the United States in its submission to the Chair of October 21, 2021, would apply to the Commission collectively and would guide the Commission's formulation of specific measures; they would not impose any binding obligations on any CCMs and would not have any impacts on any CCMs.

#### **3.2 Purse seine FAD controls**

The information below pertains to the main FAD-related controls in CMM 2020-01 as an indicative set of potential FAD controls under consideration.

*a. Who is required to implement the proposal?*

All CCMs are required to adhere to the FAD closure periods, but as described under (g) below, vessels associated with specific CCMs are exempt.

*b. Which CCMs would this proposal impact and in what way(s) and what proportion?*

All CCMs are to prohibit FAD fishing throughout the Convention Area from July 1 - September 30 of each year. However, members of the PNA are permitted to exempt domestic vessels from the FAD closure. In addition, CCMs are to prohibit FAD fishing on the high seas for an additional two-month period (April-May or November-December) with exemptions for Kiribati-flagged vessels and for Philippine-flagged vessels operating in High Seas Pocket 1.

The FAD closures impact CCMs that flag purse seine vessels as well as CCMs that are associated with purse seine fishing, including coastal CCMs, port CCMs, processing CCMs like American Samoa, and market CCMs.

Most of the SIDS that are highly dependent on the purse seine fishery (the PNA members) are afforded an exemption from the closure, and thus relief from its adverse impacts. American Samoa, which is strongly dependent on the purse seine fishery, in contrast, is afforded no relief or mitigation. As described below, American Samoa has been severely impacted by the FAD closures and would continue to be impacted if the closures are adopted in the next measure.

Furthermore, without any exemption or mitigation afforded to American Samoa, it would bear an outsized proportion of the conservation burden of the FAD closures.

*c. Are there linkages with other proposals or instruments in other regional fisheries management organizations or international organizations that reduce the burden of implementation?*

We are not aware of any other measures by other organizations that would reduce the burden of implementation.



*d. Does the proposal affect development opportunities for SIDS?*

FAD closures for purse seine vessels have been in place for many years, and by regulation they have applied to all U.S.-flagged purse vessels, including those based in American Samoa. As described below, the FAD closures have substantially damaged the highly tuna-dependent economy of American Samoa, and they will continue to do so and perpetuate the outsized burden of conservation on American Samoa if they are included in the next measure.

FAD setting is an important part of fishing for U.S. purse seine vessels. As U.S. flagged vessels are the primary fleet that offloads in American Samoa, the FAD prohibition periods make fishing in the WCPO less attractive to the fleet, incentivizing it move to areas where FAD fishing is available during the FAD closures, such as the eastern Pacific, as well as to reflag to nations which are afforded exemptions to the closures.

If U.S. vessels fish in areas far from American Samoa, this reduces the likelihood that they will return to American Samoa to offload. Any reduction in offloads has significant negative impacts on American Samoa through a decreased supply of fish to the cannery. Decreased deliveries of fish to the cannery threaten the viability of the cannery, which is the critical component of the American Samoa economy. Reductions in offloading to American Samoa also result in lost revenue to related businesses and sectors that provide supplies and services, due to reduced port calls.

*e. Does the proposal affect SIDS domestic access to resources and development aspirations?*

The FAD closures have severely affected access to resources and domestic aspirations for American Samoa as described above, and will continue to do so if they are adopted in the next measure. The closures make fishing less attractive in waters near American Samoa, hindering offloading in American Samoa and all the associated economic activity and threatening the viability of the cannery and the upstream and downstream economic sectors.

*f. What resources, including financial and human capacity, are needed by SIDS to implement the proposal?*

Assuming SIDS have already implemented the FAD closure periods, no additional resources would be needed.

*g. What mitigation measures are included in the proposal?*

There is a provision for PNA members that allows them to exempt a domestic vessel from the three-month FAD closure in the waters of the vessel's flag. This provision applies only to PNA members, so it has not mitigated the impacts of the FAD closures in the past on American Samoa and other SIDS, and would fail to do so going forward if adopted in the next measure. There is also a provision for Kiribati that allows its vessels to fish on the high seas during the two-month high seas FAD closure, and a provision for the Philippines to allow its vessels to operate in a high seas pocket during the two-month high seas FAD closure. These provisions apply only to Kiribati and the Philippines, so they have not

mitigated the impacts of the FAD closures in the past on American Samoa or other SIDS, and would fail to do so going forward if adopted in the next measure.

*h. What assistance mechanisms and associated timeframe, including training and financial support, are included in the proposal to avoid a disproportionate burden on SIDS?*

None.

### **3.3 Purse seine fishing effort limits**

The information below pertains to the purse seine fishing effort limits in CMM 2020-01 as an indicative set of limits under consideration.

*a. Who is required to implement the proposal?*

All coastal CCMs would be required to limit fishing effort in their EEZs to specified levels. CCMs that are not SIDS would be required to limit the fishing effort of their vessels on the high seas to specified levels.

*b. Which CCMs would this proposal impact and in what way(s) and what proportion?*

Coastal CCMs would be impacted to the extent that fishing effort in their EEZs is constrained. CCMs that are not SIDS would be impacted to the extent fishing effort of their vessels on the high seas is constrained. In addition, CCMs whose economies are dependent on the activities of certain purse seine fleets would be impacted. In particular, as described above regarding the FAD closures, American Samoa's economy is highly dependent on the tuna industry and the cannery. The greater the fishing effort by the American Samoa-based purse seine fleet is constrained by the effort limits and other restrictive measures, particularly in the EEZs near American Samoa and on the high seas, the greater the adverse impact on American Samoa and its economy, as further described below under (d).

No SIDS that flag purse seine vessels would be impacted by the limits for the high seas. American Samoa, in contrast, because of its association with, and dependence on, U.S.-flagged purse seine vessels, has been severely impacted by the high seas limits in the past, and will continue to be severely impacted by them if they are included in the next measure. Thus, American Samoa has in the past, and would in the future, bear an outsized share of the conservation burden of the high seas fishing effort limits.

*c. Are there linkages with other proposals or instruments in other regional fisheries management organizations or international organizations that reduce the burden of implementation?*

We are not aware of any other measures by other organizations that would reduce the burden of implementation.

*d. Does the proposal affect development opportunities for SIDS?*

The high seas effort limits for the United States have in the past affected development opportunities for American Samoa, and will do so in the future if the limits are included in the next measure. This is because U.S. flagged vessels are the primary fleet that offloads in

American Samoa. As has occurred in four years in the past, if the high seas effort limits for the United States are reached in any given year, the high seas will be closed by regulation, the American Samoa-based purse seine fleet would be unable to operate in the high seas in the WCPO for the remainder of the year, and in turn would be forced to move their operations to other fishing areas available to them, such as the eastern Pacific. If U.S. vessels fish in areas far from American Samoa, this reduces the likelihood that they will return to American Samoa to offload. Any reduction in offloads will have significant negative impacts on American Samoa through a decreased supply of fish to the cannery. Decreased deliveries of fish to the cannery threatens the viability of the cannery, which is the critical component of the American Samoa economy. Reductions in offloading to American Samoa will also result in lost revenue to other businesses and sectors that provide supplies and services. For example, reduced port calls to American Samoa in recent years are estimated to have resulted in over \$56 million annually in lost revenue.

In four of the last six years, the high seas in the WCPFC Area have been closed to the U.S. purse seine fleet for part of the year due to the limit being reached (2015, 2016, 2018 and 2019). NOAA conducted a study to examine the impacts of the 2015 closure, and estimated that the economic losses in American Samoa were between \$11 million and \$110 million, depending on the counterfactual period considered. NOAA's study observed shifts in fishing effort to the eastern Pacific, and increased offloading in Mexico in 2015 due to the closure. NOAA has continued to observe greater effort and offloading in the eastern Pacific in recent years. Although the U.S. fleet has not had its access to the high seas constrained every year, the restrictions, particularly in years with strong El Nino events, have severely limited development opportunities for American Samoa, and will continue to do so in the future if the limits are included in the next measure.

*e. Does the proposal affect SIDS domestic access to resources and development aspirations?*

As described above, the high seas limits have in the past adversely affected access to resources and domestic aspirations for American Samoa, and they would continue to do so in the future, particularly if the high seas limits preclude the U.S. purse seine fleet from fishing on the high seas near American Samoa.

*f. What resources, including financial and human capacity, are needed by SIDS to implement the proposal?*

Assuming SIDS have already implemented limits for their EEZs, no additional resources would be needed.

*g. What mitigation measures are included in the proposal?*

SIDS that flag purse seine vessels have not been subject to any fishing effort limits on the high seas for their vessels, but as described above, no mitigation has been provided for other SIDS, like American Samoa.

*h. What assistance mechanisms and associated timeframe, including training and financial support, are included in the proposal to avoid a disproportionate burden on SIDS?*

None.

### **3.4 Longline observer coverage**

The information below pertains to the longline observer coverage proposed by the United States in its submission to the Chair of October 21, 2021.

*a. Who is required to implement the proposal?*

All CCMs with longline vessels operating within the scope of the Regional Observer Programme would be required to implement the proposal, which would increase the minimum level of observer coverage for longline fisheries from five to ten percent.

*b. Which CCMs would this proposal impact and in what way(s) and what proportion?*

The requirement under the proposal would be identical for all CCMs with longline fisheries operating within the scope of the ROP. The impacts of the proposal would be felt primarily by vessel owners, and on a by-CCM basis, would be roughly proportional to the total level of longline fishing effort of their respective fleets.

*c. Are there linkages with other proposals or instruments in other regional fisheries management organizations or international organizations that reduce the burden of implementation?*

None have been identified.

*d. Does the proposal affect development opportunities for SIDS?*

The expected increase in the cost of fishing due to increased observer coverage would be borne equally by all longline fleets. If the fleets of SIDS operate on smaller margins than other fleets, their development opportunities could be adversely affected due to greater competition, but if their margins are greater than those of competing fleets, their development opportunities could be enhanced. To the extent SIDS have observer providers, or are interested in developing observer providers, the proposal could present a development opportunity for SIDS.

*e. Does the proposal affect SIDS domestic access to resources and development aspirations?*

Probably not, but see response to (d).

*f. What resources, including financial and human capacity, are needed by SIDS to implement the proposal?*

Observer programs, whether associated with a SIDS or not, would have to have the capacity to double the level of coverage on longline vessels.

*g. What mitigation measures are included in the proposal?*

None.

*h. What assistance mechanisms and associated timeframe, including training and financial support, are included in the proposal to avoid a disproportionate burden on SIDS?*

None have been identified as being needed.

### **3.5 Longline bigeye tuna catch limits**

The information below pertains to the longline bigeye tuna catch limits proposed by the United States in its submission to the Chair of October 21, 2021.

*a. Who is required to implement the proposal?*

Under the U.S. proposal, the six CCMs with specified catch limits would continue to have limits some of them modified from the limits in CMM 2020-01: China, Chinese Taipei, Japan, Korea, and the United States, and they would be required to implement the limits with respect to their longline fishing vessels. CCMs with catch limits set to 2,000 mt (including Australia, the Philippines, the E.U., New Zealand, and Canada) would remain unaffected.

*b. Which CCMs would this proposal impact and in what way(s) and what proportion?*

The six CCMs listed above would be directly impacted.

The United States, for example, has reached its annual bigeye limit every year since 2010 (agreements under paragraph 9 have allowed vessels party to the agreements to continue fishing to some extent). The proposed increased limit for the United States would provide a level of catch commensurate with Hawaii longline fleet capacity (it is a limited entry fishery allowing no more than 164 vessels no greater than 101 feet in length)<sup>26</sup> and would help meet culturally important local demand through the Christmas and New Year holidays. The Hawaii longline fishery is Hawaii's largest food producer, making it critical to local food self-sufficiency.<sup>27</sup>

*c. Are there linkages with other proposals or instruments in other regional fisheries management organizations or international organizations that reduce the burden of implementation?*

None identified.

*d. Does the proposal affect development opportunities for SIDS?*

Yes, in a positive manner.

SIDS would continue to not be assigned longline limits, which would support their fisheries development aspirations to the extent they have them. Notably, increased longline bigeye catches reported by SIDS have been observed in recent years.

The proposed limits would be compatible with the FFA members' zone-based management schemes.

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<sup>26</sup> <https://www.ecfr.gov/current/title-50/chapter-VI/part-665>

<sup>27</sup> <https://www.wpcouncil.org/fall-2018-pacific-islands-fishery-newsletter/>

Maintaining paragraph 9 of CMM 2020-01 would provide for catches of U.S. vessels operating under agreements with American Samoa, CNMI, or Guam to be attributed to the territory, and would thereby continue to directly enable fulfillment of their development aspirations. The revenues received by the territories' governments under these agreements are used strictly for fisheries development and food security purposes, and would not otherwise be available to the territories. The funds provided under these agreements are the main source of dedicated fisheries development funds available to American Samoa, CNMI, and Guam, and are used in pursuit of the priorities and objectives identified in their respective MCPs.

In American Samoa, funds provided under the agreements have been used to develop fisheries infrastructure, such as longline docks, cold storage, and retail and value-added seafood markets serving the local community. They also have been used to diversify American Samoa's longline fleet, allowing them to conduct jig fishing for albacore as an alternative to longline fishing, which is no longer economical due to reduced catch rates.

In the Commonwealth of the Northern Mariana Islands, funds provided under these agreements have been used to support longline dock infrastructure development, training programs, and seafood handling. A skipjack resource assessment in the U.S. EEZ around the Mariana Islands quantified the potential for fishery development in the archipelago, noting the historical relevance of CNMI waters for pole-and-line fishing for skipjack. A Marianas Seafood Marketing Plan was developed to increase local demand for fishery products in the community, as well as to take better advantage of foreign and U.S. markets. A Saipan longline dock feasibility study was conducted to initiate development of longline fishing (and other pelagic fisheries) opportunities in CNMI. The agreements have supported several critical improvements to the Garapan Fishing Base. The base, which is located in the core of Saipan's commercial district, serves as a hub for vendors and provides safe harbor for small fishing vessels. Recently, training programs for fishers have been developed to increase and enhance fishing capacity in CNMI.

In Guam, funding from these agreements has been used on shore-side development to increase fishing access and fishing opportunities for Guam's local community. Notable contributions include the Hagatna Fishing Platform, which provides safe fishing access for subsistence shore-based fishers, as well as small boats. Agat Small Boat Marina dock was also rehabilitated to ensure access for local fishing communities in small fishing vessels that target both bottomfish and pelagic resources.

The viability of Hawaii-based longline fisheries and their agreements with the three U.S. territories also positively impact citizens from other Pacific Islands who reside in Hawaii. Hawaii's population includes more than 80,000 indigenous Hawaiians, more than 40,000 Samoans, 16,680 individuals from the Freely Associated States of Republic of Marshall Islands, Palau, and Federated States of Micronesia, approximately 9,000 Tongans, and several thousand individuals from other Pacific Islands. For fiscal year 2018, the State of Hawaii estimated costs of about \$198 million for direct services to support FAS migrants living and working in Hawaii (primarily for health and education).<sup>20</sup>

The Hawaii-based longline fisheries and associated seafood industry employ a significant number of individuals from other Pacific Islands. Moreover, the Hawaii-based longline fisheries maintains market and supply chain infrastructure for seafood products from other Pacific Islands, including both fresh and frozen tuna that is sold by large U.S. retailers in Hawaii and beyond.

*e. Does the proposal affect SIDS domestic access to resources and development aspirations?*

Yes, it would positively affect access to resources and development aspirations of three SIDS, American Samoa, CNMI, and Guam.

*f. What resources, including financial and human capacity, are needed by SIDS to implement the proposal?*

None needed.

*g. What mitigation measures are included in the proposal?*

None.

*h. What assistance mechanisms and associated timeframe, including training and financial support, are included in the proposal to avoid a disproportionate burden on SIDS?*

No such mechanisms are included or needed to avoid a disproportionate burden of conservation action on SIDS.