



**Western
Pacific
Regional
Fishery
Management
Council**

June 16, 2021

The President
The White House
1600 Pennsylvania Ave NW
Washington D.C. 20006

Dear Mr. President:

On March 25, 2021, the Western Pacific Regional Fishery Management Council (“the Council”) voted unanimously to help US island fishing communities by exploring options to remove commercial fishing prohibitions in the Pacific Remote Islands (“PRI”) Marine National Monument (“MNM”), and allow fishery resources to be sustainably managed under the authority of the Magnuson-Stevens Fishery Conservation Act (“MSA”). The purpose of this letter is to inform you of the negative impacts that American fishing industries, seafood consumers and indigenous communities face as result of non-science-based proclamations establishing an MNM in the Western Pacific Region.

The PRI MNM was unilaterally established by Presidential Proclamation in 2009, and significantly expanded through a second Proclamation in 2014 in the same manner. The PRI MNM closes over 316 million acres (495,189 square miles) to American commercial fishing vessels. This closure encompasses over 10 percent of the entire US Exclusive Economic Zone (EEZ). The Council was one of many organizations and individuals who expressed strong concerns over the lack of a scientific or empirical basis for this monument expansion and other MNMs in the US EEZ, as well as lack of consideration about the impacts of these designations on indigenous people, and the communities. The impacts of such designations include the following:

Impacts to Indigenous Cultures, Economies and Subsistence: The economic opportunities for the insular areas in the Western Pacific are very limited. American Samoa, Guam and the CNMI consistently have higher poverty values and lower median income values than the rest of the US. Traditionally, these island communities depended on their ocean resources for food and opportunities for maritime commerce. Higher prices of goods in these islands due to their isolated geography is a barrier for these underserved communities and

prohibition on fisheries removes the ability for these people to participate in an economic opportunity that could provide equity. The economies of these US territories are highly dependent on the tuna industry. Any negative impact to the industries that sustain these underserved economies will have devastating reciprocal adverse effects.

Impacts to U.S. Commercial Fishery Landings: The Hawaii longline fishery lands \$110 million of fresh (not frozen) fish, consistently ranking the Port of Honolulu as one of America's top 10 fishing ports in value landed. The Pacific Remote Islands (PRI) MNM by closed fishing grounds comprising 12 percent of the Hawaii longline fishery's landings which is compounded to almost 20 percent of the productivity of the Hawaii longline when including other MNMs. The closure of fishing grounds in the PRI also severely impacted the US purse-seine and American Samoa-based longline fleets. The area of the PRI MNM formed 10 percent of the U.S. purse-seine fishing effort; an area where foreign fishing fleets are not able to access.

Impacts to U.S. Commercial Fishing Industries: The loss of fishing grounds due to the MNMs has had long-term effects on fishery participants, shore-side business and coastal communities that rely on the fishing industry. The impacts to the US purse-seine fleet have devastated the cannery in American Samoa, an industry that represents 52 percent of the territory's gross domestic product and is its largest private enterprise employer. The number of US purse-seine vessels has decreased from 34 in 2017 to only 14 in 2021 and the decline is attributed in part to the inability of the fleet to fish within US waters around the PRI. This has displaced US commercial fishing vessels into a much-reduced US EEZ waters to compete with recreational and small boat fishermen and to the high seas with foreign fleets that are not as highly regulated and may engage in Illegal, Unreported, and Unregulated (IUU) fishing. These IUU fish enter the US markets where US fishermen and fishing industries continue to compete with foreign fish and seafood. Displacement has also resulted in US vessels having to pay up to \$13,000 per day to fish in the waters of Kiribati which is immediately adjacent to Jarvis Island.

Regulatory Duplication: The MNM designations overlay no-take or very limited-take monuments in areas that were already designated as marine protected areas under the MSA and which allowed sustainable commercial fishing. The MSA, the preeminent and successful federal fishing law, ensures the prevention of overfishing while achieving optimum yield for the benefit of the local island communities and nation. Indeed, the Council has enacted regulations that remain in effect regulating fisheries in these areas (50 CFR 665, Subpart E). The management measures under which these fisheries have operated have set standards that have been internationally adopted by regional fishery management organizations worldwide. The

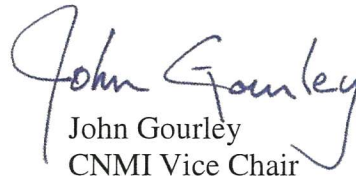
monuments do not add any fishery conservation benefits or climate change mitigation (the purported purpose of the establishment of the monuments), especially to highly mobile species such as tunas, billfish, and sharks. Instead the monuments weaken US fisheries, US interests, US negotiations and US competition in the Pacific.

In summary, the Council supports Monuments that apply sound management principles along with sustainable uses that ensure long-term productivity of fish stocks and the conservation of protected resources and habitats. We request that the Administration allow fishing to be permitted in the 50-200 mile portion of the US EEZ around Johnston Atoll, Jarvis Island, and Wake Island, subject to Council and NOAA/NMFS management through the MSA. Apart from benefits to our island economies, the range of waters open to fishing would allow fisheries to remain resilient in the face of climate change. Please open these waters to US fishermen. The Council Chair and Executive Director request the opportunity to meet with your point of contact for Monuments to discuss this request.

Most Respectfully,



Taotasi Archie Soliai
Council Chair



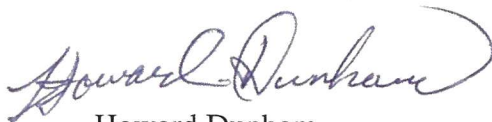
John Gourley
CNMI Vice Chair



Ed Watamura
Hawaii Vice Chair



Michael Duenas
Guam Vice Chair



Howard Dunham
American Samoa Vice Chair



Kitty M. Simonds
Executive Director

Cc: Secretary of Commerce
Secretary of the Interior

Encl:

- (1) Map of US EEZ and closed areas to commercial fishing in the Western Pacific
- (2) Uneven Playing Field for US Longline Fleet within the WCPO
- (3) Global Fishing Watch Map of Foreign Fishing Around the PRIA

Enclosure 1 US EEZ Regulated Fishing Areas, Western Pacific Region

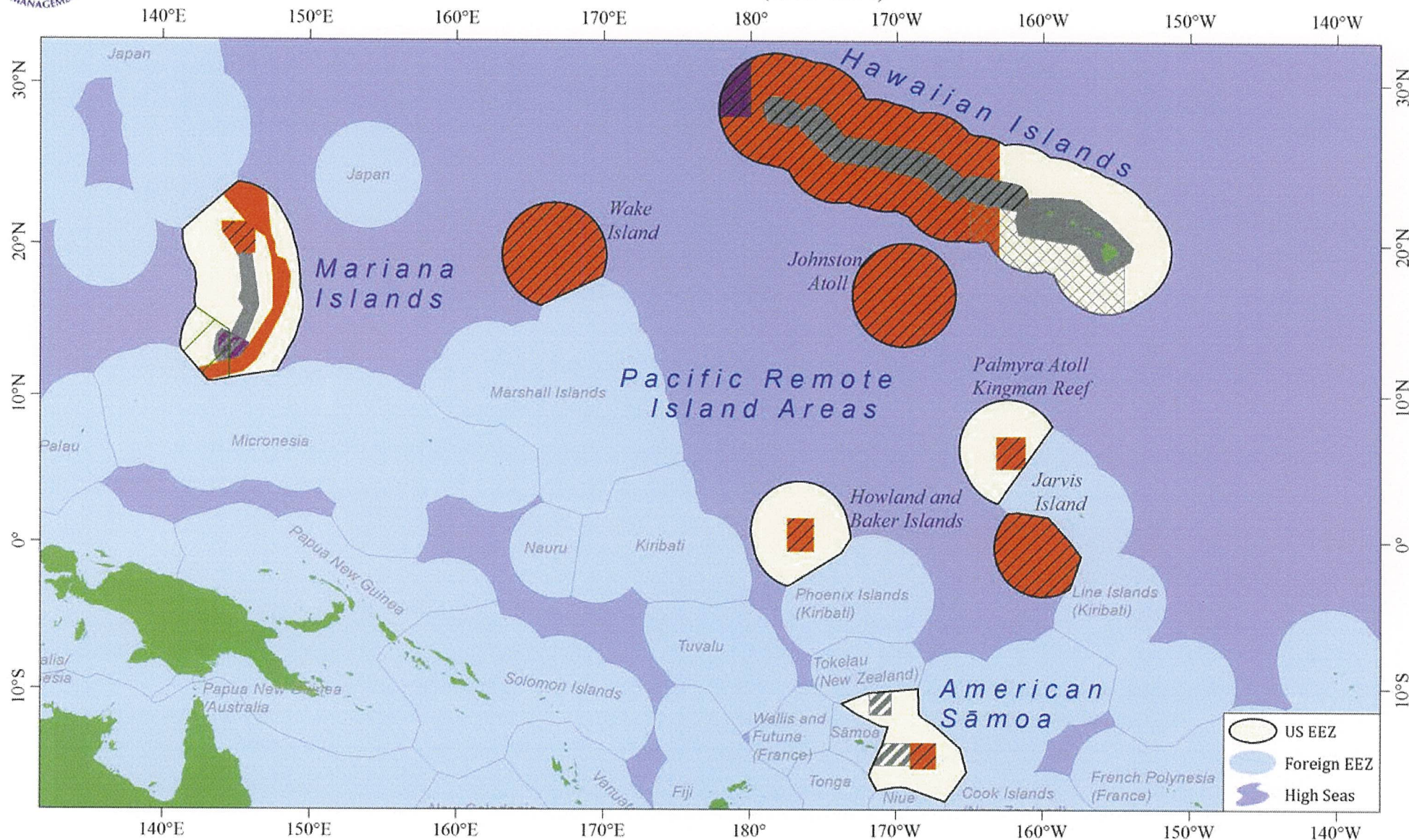


Magnuson-Stevens Act

- | | |
|---------------------------------------------------|-----------------------------------------------------------------------------------|
| Longline fishing prohibited (1991 - 92, 2011) | Bottomfish/Groundfish fishing prohibited (1986) |
| Large Vessel Prohibited Area (2002) | Bottomfish Vessels ≥ 50 ft prohibited (2006) |
| False Killer Whale Southern Exclusion Zone (2012) | US EEZ: trawling, drift gillnets, poisons and explosives prohibited (1986 - 2004) |
| Guam No Anchor Zone (2004) | |

Antiquities Act

- | |
|----------------------------------------|
| Marine National Monument (2006 - 2016) |
| Closed to all commercial fishing |



Uneven Playing Field for U.S. Longline Fleet within the Western and Central Pacific Ocean (WCPO)

Issues	US Fleets	Competing Foreign Fleets
WCPO Bigeye Tuna Longline Catch Limits in metric tons (mt)¹	3,554 mt (lowest of nations with specified limits)	Japan: 17,765 mt; Korea: 13,942 mt; Chinese Taipei: 10,481 mt; China: 8,724 mt; Indonesia: 5,889 mt; Small Island Developing States: no limits
Longline Fleet Size and Capacity Limits in WCPFC (September 2020)²	Hawaii-based: 145 longliners active, capped at 164 American Samoa: 9 active, capped at 60	Japan: 420; Korea: 118; Chinese Taipei: 618; China: 506; Indonesia: 0.
WCPO Average Longline Vessel Size (Tonnage, mt)²	82 mt	Japan: 182 mt; Korea: 410 mt; Chinese Taipei: 127 mt; China: 384 mt; Vanuatu: 454 mt; Average International Vessel: 221 mt
WCPO Average Longline Vessel Crew Size²	6 crew	Japan: 15; Korea: 25; Chinese Taipei: 15; China: 19; Vanuatu: 24; Average International Vessel: 16 crew
National Fishery Subsidies³ ('Beneficial' subsidies in parentheses). Values in USD³	\$3.4B (\$2.2B in "beneficial" subsidies); \$21M/yr Tuna Treaty,	China: \$7.3B (\$434M); EU: \$3.8B (\$1.5B); Korea: \$3.2B (\$1.5B); Japan: \$2.8B (\$534M); Chinese Taipei: \$787M (\$69M). Chinese subsidies deemed to be 91-95% 'harmful'
Reported 2019 Longline Fishery Observer Coverage⁵ (minimum requirement is 5% in international waters)	<u>By effort (hooks fished):</u> 18% <u>By trip:</u> 22.9% (deep-set), 100% (shallow-set)	<u>By effort (hooks fished):</u> China: 2.1%; Japan: 2.7%; Korea: 3%; Chinese Taipei: 7.4%; Indonesia: 0% <u>By days fished in international waters:</u> China: 5.3%; Japan: 6%; Korea: 11%; Chinese Taipei: 5.5%, Indonesia: N/A
Reported 2019 WCPO Longline Transshipment Events⁵	None	China: 299, Japan: 249, Korea: 129, Chinese Taipei: 1,015
Reported 2019 WCPO Longline Transshipment of Bigeye Tuna (mt)⁵	None	China: 6,339 mt, Japan: 187 mt, Korea: 8,357 mt, Chinese Taipei: 7,646 mt
Import/Export of Tuna Products to/from United States in 2019 (in mt and USD)⁶	<u>Export Tuna:</u> 2,805mt, valued \$13.3 M <u>Export Bigeye tuna:</u> 64 mt, \$491K	<u>Import Tuna:</u> 282,777 mt, valued \$1.875B China: 3,025 mt; Korea: 2,304 mt; Japan: 1,371 mt; Chinese Taipei: 1,555 mt; Indonesia: 30,674 mt; Thailand: 105,514 mt; Vietnam: 39,155 mt; Philippines: 13,017 mt <u>Import Bigeye tuna:</u> 4,974 mt, \$35.5M

¹WCPFC CMM-2018-01 Conservation and Management Measure for Tropical Tunas, Western and Central Pacific Fisheries Commission (WCPFC), www.wcpfc.int

²WCPFC Record of Fishing Vessel Registry, September 2020, www.wcpfc.int

³Sumaila, U.R., N. Ebrahim, A. Schuhbauer, D. Skerritt, Y. Li, H. S. Kim, T. G. Mallory, V.W.L. Lam, D. Pauly. (2019). *Updated estimates and analysis of global fisheries subsidies*. Marine Policy, Vol. 109

⁴16th Regular Session of the WCPFC Compliance Monitoring Report, December 2019, www.wcpfc.int

⁵16th Session of Technical and Compliance Committee of the WCPFC, September 2020, www.wcpfc.int

⁶NOAA Fisheries Foreign Fisheries Trade Data <https://www.fisheries.noaa.gov/national/sustainable-fisheries/foreign-fishery-trade-data>

