



MEMORANDUM

November 17, 2025

To: Andrew Lawler, Principal Deputy Assistant Secretary for International Fisheries
U.S. Commissioners to the WCPFC
Ryan Steen, PAC Chair

From:  Kitty Simmonds, Executive Director

Subject: WPRFMC Priorities and Draft PAC Recommendations for WCPFC22

The Council and its advisors provide the following priorities and draft PAC recommendations:

Regarding South Pacific albacore:

1. The U.S should work to center WCPFC decisions on adoption of a South Pacific albacore management procedure as a priority, independent of an implementation CMM with allocations. This is noting preference to run the management procedure during 2026 prior to an agreement on allocations. The WCPFC could hold an extraordinary session during 2026 to reduce burdens at the December 2026 meeting where tropical tuna negotiations will take place.

2. HCR7 could be a preferential MP option for South Pacific albacore, noting it performs better than most options in terms of potential fishery performance (i.e. vulnerable biomass), yields best catch stability, and reduces catch of South Pacific albacore while not overly restricting potential allocations to American Samoa.

3. If a CMM with allocations is negotiated at WCPFC22 for South Pacific albacore, the U.S. should work with American Samoa such that American Samoa is ensured a catch allocation that fulfills historical levels of catch prior to 2018 and allows transferability of catch from American Samoa to other CCMs. The U.S. and American Samoa should jointly consider:

- a. Any necessary language in an implementation CMM that recognizes American Samoa's unique relationship with the United States such that transferability of albacore from U.S.-flagged American Samoa longline vessels to any CCM is made possible.
- b. Recognition of American Samoa's unique situation where it does not have access to the high seas (Article 10, Para 3(h)) and work to ensure that transferability of albacore from American Samoa can be made to any vessels or CCMs fishing in an

EEZ or on the high seas, without stipulation. This is noting that an FFA proposal to WCPFC22 already has precedence of exemptions for Samoa.

Regarding a bigeye tuna management procedure framework:

4. The U.S. should negotiate for a TRP consistent with 2012-2015 relative spawning stock biomass levels, noting this level has been used a benchmark for successful fishery performance in all fisheries while maintaining stock biomass significantly above biomass limit reference points for bigeye tuna.
5. The U.S. should address concerns that the current MP framework fails to provide adequate conservation and management controls, including:
 - a. The absence of management controls of bigeye tuna mortality from fisheries that are ‘covered’ under the skipjack management procedure that contribute the largest source of fishing mortality. The ‘hierarchical’ combined MP approach would not control or reduce juvenile fishing mortality on bigeye tuna, when necessary.
 - b. The SSP’s dismissal of impacts of the FAD closure period on performance of a management procedure in which current purse seine fisheries contribute 45% of bigeye mortality in weight, not even individual fish, noting a large portion of purse seine catch is juveniles of significantly smaller size.
 - c. Current MP controls account for only 27% of catch, in weight, from tropical longline fisheries, while the Hawaii-based U.S. fishery also partakes in northern longline fisheries that account for 6% of bigeye catch, in weight, which are not covered in MP controls.
 - d. The current MP framework produces a potentially unfair burden on the Hawaii longline fishery when management controls are needed. This is noting the Hawaii fishery catches potentially two thirds of its catch within a tropical longline fishery below 20 degree North - but with zero recent catch below 10 degrees North, where most fishing mortality is occurring in the tropical longline area.
 - e. The SC has not fully endorsed the MP framework and it has been deferred for discussion for the Commission, so all aspects of the bigeye tuna MP should be up for negotiation.
6. The U.S. should work with other CCMs (such as Japan) to develop modifications to the bigeye tuna management procedure that account for the above issues outlined in draft recommendation #5.

Regarding Electronic Monitoring

7. The U.S. should continue with a proposed CMM that combines monitoring obligations of the regional observer program and electronic monitoring. This acknowledges the transition of the U.S. Hawaii and American Samoa longline fisheries to full implementation of electronic monitoring from 2025-2027, while still maintaining limited human observers.

Regarding Seabirds

8. The U.S. should ensure that provisions proposed by New Zealand for seabirds be limited to the southern hemisphere and not to conflict with U.S regulations.

Regarding Sharks

9. The U.S. should work to ensure that spatial stratification is included as a condition for the next oceanic whitetip shark stock assessment.

At its 204th Council Meeting, the Council made the following recommendations regarding WCPFC issues that were previously sent to NMFS:

Regarding WCPFC Fishery Issues, the Council:

1. Requested U.S. to work towards ensuring that a management procedure for South Pacific albacore is adopted at the next Commission meeting with target reference point that controls total catch that can lead to improved economic conditions for the American Samoa longline fishery
2. Requested NMFS to liaise with territorial agency leads before the December 2025 WCPFC with the purpose of reviewing current issues and processes for territories to take full advantage of their status as a Small Island Developing State and Participating Territory within the WCPFC.
3. Requested the U.S. to continue working with American Samoa to attribute catch of purse seine vessels identified by American Samoa as integral to their local tuna economy, and to consider domestic rulemaking if needed to distinguish U.S. Pacific territorial purse seine fisheries.
4. Requested NMFS and the SPC to provide an analysis of pricing structure of cannery markets in American Samoa compared to those in Bangkok and Manta, or other markets.
5. Requested the U.S., at the WCPFC subsidiary meetings, work to ensure that spatial stratification is included as a condition for the next oceanic whitetip shark stock assessment.

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