



Memorandum

To: Andrew Lawler – Head of Delegation

Cc: Stuart Chikami
Roger Dang
Gerry Leape
Christa Svensson
PAC members

From: Eric Kingma, HLA Executive Director

Date: November 17, 2025

Re: PAC Recommendations Related to WCPFC22 (Manila)

1) **Bigeve Tuna Management Procedure Evaluation**

- a. The SPC has provided several BET management procedure (MP) options for consideration by the Commission at WCPFC22 which are not acceptable.
 - The candidate MPs only control the “tropical longline fishery from 20N-10S”, which represents 27% of fishing mortality on the stock.
 - The purse seine fishery, which at 45% has the greatest impact on BET stock status, is not included in the candidate MPs. Other fisheries also not included are the IN/PH/VN at 15% impact, Northern longline 6% and Southern longline line 5%,
- b. Without inclusion of these key fisheries, the only catch/effort controls that could be applied under the MP are on the longline fisheries operating between 20 N and 10 S.
 - About 70% of Hawaii longline bigeye catch/effort occurs south of 20 N, with nearly 100% of catch occurring north of 10 degrees N.
- c. Japan made strong statements at the scientific committee that the Commission has not agreed on these candidate MPs and that another potential option needs to consider inclusion of the purse seine fishery (see paragraph 587 of SC21 report).
- d. **USA should work with Japan and other CCMs to ensure that the Commission directs SPC to include another candidate MP option, for consideration in 2026, that includes purse seine and other fisheries, not just the tropical longline fishery.**
- e. **USA should ensure the Commission will not adopt a more conservative TRP than 0.34 SB/SBf=0 which is equivalent to 2012-2015 average levels and identified in CMM 2023-01.**
 - Adopting a higher level of target biomass would require reductions in longline limits identified in table 3 of CMM 2023-01.

- f. **USA should ensure that if the WCPFC22 agrees on mixed fishery hierarchical approach that it is appropriate and does not disadvantage one fishery over another (i.e. purse seine over longline).**

2) Electronic Monitoring

- a. The Hawaii longline fleet is transiting to 100% EM installations within the next 3 years, with the goal of fully replacing human observers.
- b. The WCPFC requirement of 5% longline observer coverage will not be able to be met for the Hawaii longline fishery.
- c. **USA should introduce a CMM for WCPFC22 consideration that EM can be used by CCMs to satisfy the 5% minimum longline observer coverage rate.**

3) South Pacific Albacore MP and New Measure

- a. **USA should oppose any allocation scheme that unfairly limits high seas fishing opportunities in favor of EEZ limits.**
 - i. HLA has concerns about the potential for limiting high seas longline fishing as future precedent setting with respect to bigeye longline limits and economic initiatives such as zone-based limits.

4) Seabirds

- a. **USA should ensure that the NZ proposal to revise the seabird measure remains limited to southern hemisphere only and no changes for northern hemisphere.**

5) Marine Pollution

- a. **USA should ensure that any marine pollution measure developed does not duplicate MARPOL or provide unnecessary and burdensome reporting mechanisms for fishing vessels.**