



HUMANE SOCIETY INTERNATIONAL

HSI Views paper for Kobe II Bycatch Workshop Brisbane 23-25 June 2010

Humane Society International (HSI) welcomes the opportunity to present its views to the Kobe II Bycatch (K2B) Workshop. HSI has been endeavouring to assist national and international fisheries managers for over 15 years on issues of economic and ecological sustainability, specifically addressing bycatch species impacts. This paper considers the incidental mortality of seabirds, sharks, turtles and marine mammals within all tuna RFMOs.

HSI has become increasingly concerned about:

- The RFMOs' lack of progress in substantially reducing bycatch.
- The inadequacy of existing mitigation measures agreed to thus far.
- The lack of evidence to indicate that existing required measures are being used or complied with.
- The lack of adequate enforcement and incentives for compliance.

HSI therefore urges specific attention be focussed on these matters at the K2B workshop in order for bycatch rates to be reduced.

One of the objectives of the K2B workshop is to '*make recommendations on mechanisms to streamline the work of tuna RFMO Working Groups in this field in order to avoid duplication*'. HSI agrees that it is essential to avoid duplication. However it is equally essential to ensure that there is consistency between the measures RFMOs require and that they are effective.

Why RFMOs need to be consistent in adopting best-practice mitigation measures

1. The same vessels fish different regional fisheries areas.
2. Bycatch problems are not static and there is an incomplete picture of where vulnerable species occur.
3. Effective measures to mitigate longline and purse seine bycatch are not area specific.
4. Effective measures to mitigate bycatch of one species group (seabirds) may be equally effective for other species groups (sharks & sea turtles) and these species may not have overlapping oceanic distributions.
5. There is little or no evidence to suggest that using effective mitigation measures has any negative economic impact.
6. Without consistency, ensuring compliance becomes virtually impossible.

HSI is concerned that RFMOs devote far less attention to bycatch than to target species. We suggest that countries work toward a system wherein performance-based ecological sustainability is used as one criterion for allocation of target species quotas, in order to increase the incentive to achieve ecological sustainability and drive bycatch rates down.

HSI recommends the following measures be taken up by all RFMOs in order that bycatch rates for seabirds, sharks, turtles and marine mammals are substantially lowered as soon as possible. To achieve an objective of bycatch reduction for all species affected, it is essential that the overall consequences of any mitigation measure are considered: a species-by-species approach to mitigation is inappropriate.

1. Mandatory adoption of a minimum baited hook sink rate for pelagic and demersal longline fisheries achieved through line weighting. This measure is essential to reduce seabird bycatch: without it other bait protection strategies, such as bird scaring lines, are inadequate. Once a line weighting regime is in place, compliance and enforcement problems are relatively low and it has great potential for lowering sea turtle and shark catches, by ensuring gear is taken to, and maintained at, a greater depth.



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2. RFMOs which fail to implement a mandatory baited hook sink rate requirement must urgently impose night-only hook setting wherever seabirds that are at risk of capture occur.

3. A binding resolution that prohibits the removal of shark fins at sea is essential. Parties should require their fishers to land sharks with their fins fully or partially attached in the natural way. In addition, there should be precautionary TACs on all shark species and a non-retention requirement for certain species such as hammerheads, threshers, porbeagles, oceanic whitetips and other vulnerable species.

4. Further limiting impact on sharks and sea turtles requires specific consideration of gear use modifications as well as restrictions such as banning the use of light sticks and squid as bait.

5. In tuna fisheries longlines pose the greatest threat to sea turtles. Specific attention should be paid to improving post-release survival prospects of sea turtles. Given the expected high incidence of sea turtle live capture on hooks, existing guidelines such as: <http://www.nmfs.noaa.gov/sfa/hms/workshops/Tech%20Memo-%20Handling%20Protocols.pdf> and <http://www.fao.org/docrep/012/i0725e/i0725e00.htm> should be followed. The presence and proper use of equipment such as dehookers and line cutters should be mandatory.

6. Sea turtles may also become entangled in Fish Aggregating Devices (FADs) and steps should be taken to minimise these risks. FADs should be monitored and entangled sea turtles released immediately. FAD designs that minimise the capture of sea turtles should be considered. The registration and collection of FADs should be a requirement to eliminate the occurrence of abandoned and drifting FADs.

7. The deliberate chasing of schools of dolphin to catch tuna swimming beneath them is unacceptable and dolphin caught in this manner should not be considered bycatch, as they have been intentionally targeted. This situation is unique to the Eastern Tropical Pacific tuna fishery. However, the practice has led to the development of techniques that can be used to decrease true incidental catch of marine mammals in purse seine nets, such as procedures for manually removing dolphins from nets and regulations prohibiting night sets when it is more difficult to see what species have been caught in the nets. These practices could also be used to decrease bycatch of other species in purse seine nets. Marine mammals, sharks and sea turtles have usually drowned in these nets by the time they are brought on board. Many marine mammals are also caught on hooks or entangled in lines. The best way to avoid this is by establishing seasonal restrictions where high marine mammal bycatch occurs.

8. Regular and frequent technical sub groups on bycatch should be held by every RFMO, to collate and analyse bycatch data and recommend prompt and effective mitigation measures.

9. Area and seasonal closures should be implemented to protect particularly vulnerable species in their breeding, nursery and foraging grounds, and migratory pathways where bycatch mitigation is ineffective.

10. Onboard observer programs should aim to achieve 100% observer coverage, or whatever percentage a power analysis determines is necessary to provide a statistically reliable estimate.

HSI places great importance on the potential of K2B workshop to bring about much needed improvement in the management performance of high seas fisheries and hopes that its attendance can assist in this process.