



June 6, 2021

Alexa Cole
Acting Deputy Assistant Secretary for International Fisheries
NOAA Fisheries
1315 East-West Highway, 13th Floor
Silver Spring, MD 20910

Michael Tosatto, Regional Administrator
NOAA Fisheries Pacific Islands Regional Office
1845 Wasp Boulevard, Bldg 176
Honolulu, HI 96818

RE: Western and Northern Pacific Ocean Striped Marlin

Dear Ms. Cole and Mr. Tosatto,

As leading local, national, and international recreational and small-boat fishing and ocean conservation organizations, **we are writing to express our support for the United States’ continued commitment to negotiating strong international conservation measures for Western and Central North Pacific Ocean (WCNPO) striped marlin necessary to replenish the spawning stock and restore opportunities for small-boat fishermen and recreational fishermen in Hawaii and the eastern Pacific.**¹ The Pacific’s largest predatory fish have been drastically impacted by industrial fishing. WCNPO striped marlin are no exception. The stock has been experiencing overfishing since 1977, and fishing is impeding rebuilding. A pending stock assessment in 2022 should not postpone this priority.

¹ The boundary of the WCNPO striped marlin and Eastern North Pacific striped marlin stock is defined as the waters of the Pacific Ocean west of 140°W and north of the equator. However, studies indicate that striped marlin caught in southern California are genetically linked to the WCNPO striped marlin stock representative in Hawaii, Japan, and Taiwan. Therefore, supporting a rebuilding plan for WCNPO striped marlin may improve the availability of striped marlin to southern California recreational fishermen.

We support the inclusion of ocean-wide catch limits in the Consultative Draft Proposal² prepared by the U.S. However, catch limits should be matched with conservation measures to ensure that annual limits are not exceeded and striped marlin is rebuilt. **We encourage you to support 1) expanding the use of circle hooks, 2) requiring the release of live striped marlin, 3) modifying longline gear to remove hooks adjacent to floats or increase hook depth, 4) protecting striped marlin spawning and nursery grounds, and 5) mandatory reporting of live and dead discarded striped marlin.** These measures can reduce the catch of striped marlin, prevent mortality, increase post-release survivability, and protect spawning stock and juveniles.

We ask the U.S. to continue pursuing a good faith proposal that includes member based catch limits (including discards) based on the relative impact of the member country. We do not support the Western Pacific Fishery Management Council recommendation to limit striped marlin catches to 500 mt per member. This strategy is inconsistent with the rebuilding plan as it would allow every member, except Japan, to increase catch and does not provide any means of ensuring ocean-wide catch limits needed to rebuild the stock are not exceeded.

We see the expedited striped marlin stock assessment as an opportunity for the Billfish Working Group to answer important questions about rebuilding and should consider:

1. An alternative phased rebuilding plan that includes an immediate catch reduction of greater than 13.4%, for example 27% or 40%. Most successful rebuilding plans incorporate a substantial, measurable reduction in fishing mortality at the onset, rather than relying on incremental small reductions over time.³
2. Adjusting the stock assessment and rebuilding plan to account for uncertainty in foreign catch and discard. Recent catch may be significantly above what is reported and scientists should consider including the highest possible value of mortality that includes unreported catch and discards.
3. Analyzing how well measures such as release of live marlin, use of circle hooks and other gear modifications can reduce catch and mortality and help achieve the rebuilding goal.

In addition, we encourage you to support development of a harvest strategy for WCNPO striped marlin consistent with conservation and management measure (CMM) 2014-06.⁴ Through a harvest strategy we can establish biological, ecological, socioeconomic objectives for striped marlin. A harvest strategy that is proactive and adaptive and establishes a framework that considers the best available science and acceptable risk when setting harvest levels will lead to more consis-

² Conservation and Management Measures for North Pacific Striped Marlin, Consultative Draft Proposal Submitted by the United States to the 17th Regular Meeting of the Western and Central Pacific Fisheries Commission, available at <https://www.wcpfc.int/doc/wcpfc17-2020-dp08/conservation-and-management-measure-north-pacific-striped-marlin-consultative>

³ Steven A. Murkawski, Rebuilding depleted fish stocks; the good, the bad, and mostly, the ugly. *ICES Journal of Marine Science*, Volume 67, Issue 9, December 2012, Pages 1830 - 1841.

tent, predictable and transparent management. Using management strategy evaluation to develop the harvest strategy would enable an effective plan through the rebuilding period as well as maintenance of a sustainable fishery once achieved. We also welcome and encourage management strategies that focus on a movement away from status-quo management, which has not been successful to date, toward a more Dynamic Ocean Management (DOM) process that incorporates biological, environmental, and fishery data leading to a more ecosystem-based approach to management.

The United States' longline fleet has increased its overall tonnage and relative catch of striped marlin over the past 10 years, making it imperative that we offer the international community real solutions to reduce catch and mortality of striped marlin and to protect the spawning and nursery grounds to ensure the long term viability of WCNPO striped marlin. Concerted ocean-wide international action taken to protect and rebuild striped marlin will result in robust recreational, small boat and subsistence fishing and economies whose success depend on higher population levels. Thank you for your leadership in supporting precautionary management to rebuild WCNPO striped marlin.

Sincerely,



Theresa Labriola
Pacific Program Director
Wild Oceans



Jason Schratwieser
President
The International Game Fish Association



Danielle Cloutier, PhD
Pacific Fisheries Policy Director
American Sportfishing Association



Bill Shedd
Chairman
Coastal Conservation Association of California

Robert McGuckin
President
Hawaii Big Game Fishing Club

Moana Bjur
Executive Director
Conservation Council for Hawai'i



Amanda Nickson
Director, International Fisheries
The Pew Charitable Trusts



Dave Gershman
Officer, International Fisheries Conservation Program
The Ocean Foundation