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**American Albacore Fishing Association
North Pacific Albacore Pole & Line and Troll/Jig Fishery**

FINAL DETERMINATION REPORT

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Glossary

AAFA	American Albacore Fishing Association
ATHL	Average of the ten historically lowest estimated (stock biomass) points
BCTFA	British Columbia Tuna Fishermen's Association
CHMSF	Canadian Highly Migratory Species Foundation
CPS	Coastal pelagic species
CR	MSC Certification Requirements V.1.2
EEZ	Exclusive economic zone
ETP	Endangered, threatened or protected (species)
FMP	Fishery Management Plan
HMS	Highly migratory species
IATTC	Inter-American Tropical Tuna Commission
IMM	Intertek Moody Marine
ISSF	International Seafood Sustainability Foundation
MSA	Magnuson-Stevens Fishery Conservation and Management Act
MSC	Marine Stewardship Council
NC	Northern Committee (of the WCPFC)
NMFS	National Marine Fisheries Service
NZ	New Zealand
PFMC	Pacific Fisheries Management Council
PI	Performance indicator
PSA	Productivity-susceptibility analysis
RBF	Risk-based framework
SAFE	Stock assessment and fishery evaluation (report)
SG	Scoring guidepost
SI	Scoring issue
SICA	Scale-intensity-consequence analysis
SSB	Spawning stock biomass
SWFSC	Southwest Fisheries Science Center
UoC	Unit of certification
US	United States of America
WCPFC	Western and Central Pacific Fisheries Commission
WFOA	Western Fishboat Owners Association
WWF	World Wildlife Fund

1 Executive Summary

This report sets out the results of the reassessment of the American Albacore Fishing Association (AAFA) North Pacific albacore tuna (*Thunnus alalunga*) pole & line and troll/jig fishery against the Marine Stewardship Council (MSC) Principles and Criteria for Sustainable Fishing. The fishery was previously certified as sustainable in August 2007.

This version of the assessment report is the Final Determination Report, such that the fishery has already proceeded through the public consultation phase and will be certified if no objections are now raised by stakeholders to its certification.

The assessment of the fishery was undertaken by Dr. Norman Bartoo, Dr. Rob Blyth-Skyrme and Dr. Mike Laurs, who covered Principle 1 (target stock), Principle 2 (environment) and Principle 3 (management) components of the MSC Standard respectively. A site visit to San Diego, California, was undertaken in October 2011 to meet with scientists, fishery managers and stakeholders, as well as representatives of AAFA. No stakeholders chose to meet with the team during the site visit, although some initial, written stakeholder submissions were received, included in this report as Appendix 7 (from the World Wildlife Fund- WWF) and Appendix 8 (from the International Seafood Sustainability Foundation- ISSF).

Albacore is a highly migratory species (HMS), and the North Pacific stock ranges across much of the North Pacific Ocean between about 10⁰ N and 50⁰ N. Albacore mature by the relatively early age of approximately 6 years and have a moderate lifespan of about 10 to 12 years. The species is highly fecund with up to about 2.6 million eggs per spawning. Growth rates are moderate, with fork lengths at first birthday nearly 40 cm and at sexual maturity at age 6 approximately 90 cm or somewhat less.

Albacore, like other tunas, have a number of physiological and morphological specializations that adapt them to a fast, continuous swimming lifestyle in the pelagic open ocean environment. Their metabolic rates are 2 to 10 times higher than most other bony fishes, and they have very large eyes for detecting prey and specialized fins and body form to reduce drag. Albacore are generally considered inherently resilient to fishing pressure because they have a high rate of intrinsic increase, mature at an early age, are highly fecund, are not long-lived, have a broad distributional range, and do not exhibit any characteristics that increase the ease or population consequences of capture, such as aggregating for spawning or exhibiting sequential hermaphroditism (Marsh, 2010).

The most recent assessment, completed in 2011 for fishery data through 2009, estimated that the total stock biomass of North Pacific albacore was 800,000 t in 2009, while the spawning stock biomass was near to the historic median of about 405,000 t (WCPFC 2011b).

The AAFA North Pacific albacore fishery is conducted in near-shore to offshore waters off the Pacific west coast of the USA, as well as sometimes in Canadian waters when appropriate agreements are in place. AAFA vessels use pole & line and/or troll/jig gears, with vessels commonly switching between gears types when conditions and catch rates dictate.

The pole & line and troll gears are inherently highly selective, with no seabed contact and very low levels of bycatch. Fish are caught one-at-a-time, and the gears are always attached to and worked in very close proximity to the vessel. Live northern anchovies may be used as bait in the pole & line fishery, or chum while pole & line fishing or trolling, which helps to hold shoals of albacore around the vessel. Bycatch in the northern anchovy fishery is also very low, while the method of capture means that bycatch can usually be released in very good condition.

North Pacific albacore occur in waters under the jurisdiction of both the Inter-American Tropical Tuna Commission (IATTC) and the Commission for the Conservation and Management of Highly Migratory Fish Stocks in the Western and Central Pacific Ocean (WCPFC). When operating in the



United States Exclusive Economic Zone (US EEZ), as well as in international waters when catches are landed in US ports, US HMS fisheries are managed by the Pacific Fishery Management Council (PFMC). The US West Coast albacore fishery is managed through the PFMC Highly Migratory Species Fishery Management Plan (HMS FMP).

The AAFA North Pacific albacore fishery achieved overall scores of 85.0 for Principle 1, 95.3 for Principle 2, and 94.4 for Principle 3. As such, it is recommended that the fishery is certified according to the MSC standard as being sustainable.

Two conditions of certification were placed on the fishery, however, for Performance Indicators (PIs) 1.1.2 and 1.2.2; these require the following outcomes to be achieved:

For PI 1.1.2

The client is required to demonstrate by the 4th annual audit that:

- The limit reference point is set above the level at which there is an appreciable risk of impairing reproductive capacity.
- The target reference point is such that the stock is maintained at a level consistent with B_{MSY} or some measure or surrogate with similar intent or outcome.

For PI 1.2.2

The client is required to demonstrate by the 4th annual audit that:

- Well defined harvest control rules are in place that are consistent with the harvest strategy and ensure that the exploitation rate is reduced as limit reference points are approached.
- The selection of the harvest control rules takes into account the main uncertainties.
- Available evidence indicates that the tools in use are appropriate and effective in achieving the exploitation levels required under the harvest control rules.

A non-binding recommendation was also made. This was that it would be good practice for AAFA members to be provided with and to follow guidance for seabird handling, as required by longline vessels, in the very rare event that a seabird was taken aboard an AAFA vessel.



2 Authorship and Peer Reviewers

2.1 Assessment Team

This assessment and report was produced by Dr. Norm Bartoo, Dr. Rob Blyth-Skyrme, and Dr. Mike Laurs; these team members led the Principle 1 (Stock), Principle 2 (Environment) and Principle 3 (Management) elements of the assessment respectively. Dr. Blyth-Skyrme is also the lead assessor for the assessment. A brief summary of their experience and qualifications is included below.

Dr. Norm Bartoo.

Dr. Norman Bartoo received a BS in Fisheries Management and Administration in 1970, a Masters in Fisheries Statistics in 1972, and a PhD in Fisheries Population Biology in 1977 from the University of Washington. From 1977 through 2009, Dr. Bartoo was employed by the US National Marine Fisheries Service (NMFS) Southwest Fisheries Science Center (SWFSC). There he conducted stock and fishery assessments on tunas, billfish, sharks and other highly migratory species in the Pacific and Atlantic Oceans. Dr. Bartoo directed research and stock assessments of coastal pelagic species, marine mammal stocks, Antarctic species and others. Dr. Bartoo served as a US science delegate and advisor to numerous international science bodies and forums and has extensive experience on both international and domestic scientific committees and workshops, including the Pacific Fishery Management Council. Dr. Bartoo retired from the NMFS in 2009 as the Regional Science Director, managing all research and done by the SWFSC's 3 laboratories and 4 Divisions. He has also served as the Scientific Editor of the US Fishery Bulletin and NOAA's Professional Paper series (2002-2005), and was on the Editorial Board of Ciencias Marinas. Dr. Bartoo has authored or co-authored over 60 publications and numerous technical reports.

Dr. Rob Blyth-Skyrme.

Dr. Rob Blyth-Skyrme received a BSc in Marine Biology from the University of Liverpool, a MSc in Aquaculture from the University of Stirling, and a PhD in Fisheries Management from the University of Wales, Bangor. He has worked in marine fisheries science, management and policy for more than 10 years. Prior to becoming a fisheries consultant, Dr. Blyth-Skyrme was the Deputy Chief Officer for Eastern Sea Fisheries Joint Committee, the largest inshore fisheries management organization in England. He then became a senior advisor to the UK Government on marine fisheries and environmental issues, leading a team dealing with fisheries policy, science and nationally significant fisheries and environmental casework. He has extensive experience of running and providing lead input to workshops and management fora at a national level, and has published a number of papers in peer-reviewed international journals. Dr. Blyth-Skyrme now runs Ichthys Marine Ecological Consulting, a marine fisheries and environmental consultancy with offices in the UK and Hawaii, and has undertaken all facets of MSC work as a lead assessor and expert team member.

Dr. Mike Laurs.

Dr. Michael Laurs is currently a part time marine fisheries consultant. Previously, he led a Federal fisheries research laboratory multi-disciplinary research program, as well as an operational fishery forecasting program, for albacore tuna for a little over 20 years. The research included a broad range of topics and much of it was closely coordinated with the US albacore fishing industry. Dr. Laurs conducted fishery development research that resulted in the US surface albacore fishery expansion to the central and western North Pacific and the South Pacific. He also worked closely with the west coast states and Canada to develop a uniform albacore fishery logbook system and a coordinated market sampling system to obtain length frequency and related fishery data in ports where albacore



were landed. Much of the biological research, including albacore genetics, physiology, and general biology was conducted with academic partners that he recruited. He established a notably successful albacore tagging program that resulted in a unique, valuable database of 30,000 albacore used in age-and-growth, stock structure, migration, and ecological research on the species. The albacore oceanography research, which was a notably strong part of the program, resulted in greatly improved understanding of albacore habitat and the roles that environmental variability plays in causing variations in where, when, and how many albacore may be available and vulnerable to the surface fishery. He also pioneered the application of satellite remote sensing technology in albacore ecological research.

It should be noted that the risk-based framework (RBF) was not used in this assessment, and so no team members were required to have undertaken training in the RBF.

2.2 Peer Reviewers

Information on Peer Reviewers will be provided in due course, after the client has inspected the Client Draft Report, and drafted and agreed an Action Plan to address the Conditions of Certification identified during the assessment process.

Peer Reviewer 1: Robert Gillett.

Robert Gillett has been involved in tuna fisheries and their development/management over the last 30 years. This has included three years aboard a pole-and-line vessel, over 100 reports and publications on tuna fisheries, and work across the Pacific and Indian Oceans. Mr. Gillett's clients for the tuna work have included the United Nations Development Programme, Secretariat of the Pacific Community, Forum Fisheries Agency, Food and Agriculture Organization of the United Nations, the World Bank, International Finance Corporation, the Australian Agency for International Development, the Nature Conservancy, Pacific Islands Forum Secretariat, the Asian Development Bank, University of Hawaii, U.S. National Oceanic and Atmospheric Administration, European Union, Commonwealth Secretariat, the Western and Central Pacific Fisheries Commission, the Worldwide Fund for Nature, the International Sustainable Seafood Foundation, and the Indian Ocean Tuna Commission. He has an extensive publication list focused on tuna fisheries, and was a peer reviewer for the New Zealand albacore tuna troll fishery assessment.

Peer Reviewer 2: Kevin McLoughlin

Kevin McLoughlin is a specialist fisheries consultant who previously worked with the Bureau of Rural Sciences as a Senior Fisheries Scientist engaged in a wide range of international and domestic fisheries issues with close links to Government policy. Mr. McLoughlin's responsibilities included production of BRS Fishery Status Reports—these have had a major influence on the direction of Australia's fisheries management and policy. His responsibilities have required a high level of interaction with policy and industry clients, and with international organisations. An important aspect of his work has been to be able to translate complex fisheries information to a range of audiences. Mr. McLoughlin was also a peer reviewer for the New Zealand albacore tuna troll fishery assessment, and is a member of the team conducting surveillance audits of that fishery.

3 Description of the Fishery

3.1 Unit of Certification and scope of certification sought

The MSC Guidance to the MSC Certification Requirements (MSC 2011a) specifies that the Unit of Certification as:

“The fishery or fish stock (= biologically distinct unit) combined with the fishing method/gear and practice (= vessel(s) pursuing that stock.”

The fishery proposed for certification is therefore defined as:

Species: Albacore tuna (*Thunnus alalunga*).

Geographical Area: North Pacific.

It is recognised that this fishery represents a small proportion of the total fishing pressure on this stock. As a consequence, the status of the North Pacific stock as a whole is assessed, together with fishing practices and consequences within the AAFA pole & line and troll/jig fleet only.

Method of Capture: Pole & Line and Troll (Jig).

AAFA vessels targeting albacore in the North Pacific use two different methods to catch albacore; pole & line fishing and trolling; these methods are described fully in Section 3.2 of this report.

Most AAFA vessels focus on using trolling gear. However, some vessels may repeatedly switch between pole & line and troll gears on any given day in the fishery, trolling before switching to pole & line fishing when a sufficient density of fish is found, but then switching back to trolling if the shoal subsequently disperses. Northern anchovy is the ‘bait’ or ‘chum’ of choice in pole & line fishing and may be used occasionally by vessels using trolling gear to attract and hold shoals of albacore near the surface. It is therefore not feasible to separate the catches made by the two gear types, while landings are also not separated by gear type by the state of Washington. The two gear types, which are both fished at or near the surface, are combined under one Unit of Certification.

Throughout this assessment document, the fishery will be referred to as the AAFA North Pacific albacore surface ‘pole and troll’ fishery.

Management System: Albacore occur within the jurisdictions of both the Inter-American Tropical Tuna Commission (IATTC) and the Commission for the Conservation and Management of Highly Migratory Fish Stocks in the Western and Central Pacific Ocean (WCPFC). When operating in the US EEZ, as well as in international waters when catches are landed in US ports, the US fishery is under domestic management of the Pacific Fishery Management Council.

Client Group: American Albacore Fishing Association (AAFA) member vessels and vessels recognised by AAFA.

Any vessels joining the Unit of Certification must recognise any requirements of MSC certification applied to AAFA vessels.



3.1.1 Scope of Assessment in Relation to Enhanced Fisheries

The albacore stock targeted in the North Pacific albacore fishery is not enhanced and is dependent entirely on wild spawning and growth. As such, enhanced fishery considerations do not apply to the fishery under assessment.

3.1.2 Scope of Assessment in Relation to Introduced Species Based Fisheries (ISBF)

Albacore is native to the North Pacific.

3.2 Overview of the fishery

Albacore tuna (*Thunnus alalunga*) is a highly migratory species (HMS), and the North Pacific stock ranges across much of the North Pacific Ocean between about 10⁰ N and 50⁰ N. Albacore therefore occur in waters under the jurisdiction of both the Inter-American Tropical Tuna Commission (IATTC) and the Commission for the Conservation and Management of Highly Migratory Fish Stocks in the Western and Central Pacific Ocean (WCPFC). When operating in the United States Exclusive Economic Zone (US EEZ), as well as in international waters when catches are landed in US ports, US HMS fisheries are managed by the Pacific Fishery Management Council (PFMC).

The AAFA North Pacific albacore pole and troll fishery is undertaken off the US West Coast, between California and Washington, both within the US EEZ and well offshore in international waters. The fishery employs two fishing methods- trolling and pole & line fishing.

Trolling for albacore consists of towing artificial lures with barbless hooks behind a fishing vessel at a speed of about 6 knots. Individual trolling lines are generally 3 to 20 fathoms long and are often constructed from ¼-inch braided nylon line, with a 2 fathom leader made from 200 to 260 pound test nylon monofilament, to which is attached an artificial feathered jig with a barbless double hook. Fish are caught one at a time on the trolling line and, upon striking the jig, are retrieved immediately with a hydraulic gurdy or line-puller. Usually about 14 to 20 lines may be trolled by an albacore fishing vessel, however, typically not all lines are pulled during heavy fishing activity. Trolling vessels will customarily operate with a captain and one or sometimes two crew.

In pole & line fishing, fishers use a stout pole, formerly constructed of bamboo and now made of fiberglass or a high-technology composite, with a short line that has a single barbless hook with an artificial lure or rarely a livebait. Schools of albacore are usually located by trolling and the vessel is stopped near the school of albacore, which is kept close to the vessel by throwing small amounts of live fish chum, preferably northern anchovy. Each pole & line set-up is used by an individual fisher to catch one fish at a time that is lifted aboard the vessel. Pole & line vessels usually carry about three to six pole & line fishers and a captain, who usually also ‘throws’ chum.

US albacore trolling vessels, which are also often called ‘jig vessels’, that operate in the North Pacific are in two general size classes. Smaller vessels, which range mostly from about 10m to 15m in length with hold capacities that vary from about 5 to 30 short tons, mainly comprise the fleet that operates in near shore waters within about 200 miles of the North American coast. Vessels chiefly from about 17m to 30m in length, with hold capacities from about 40 to 100+ short tons, from the fleet that operates on the high seas, as well as on near shore waters. Most vessels have refrigerated fish holds employing various types of refrigeration, but some smaller vessels may use ice to keep catches fresh. Pole & line vessels, which may also be called ‘bait boats’, are generally about the same size range and hold capacities as the larger size class of trolling vessels. All have refrigerated fish holds, some with blast or plate freezing and others with refrigerated brine systems. Pole & line vessels also have capabilities to conduct troll fishing and may shift back and forth between these types of fishing depending on the fishing conditions and/or the availability of live anchovy for chum and bait.

3.3 Principle One: Target Species

3.3.1 Albacore life history

Albacore is a highly migratory tuna species found in all of the global oceans and Mediterranean Sea. In the Pacific Ocean there are two separate and distinct stocks of albacore, one in the northern hemisphere and the other in the southern hemisphere. Albacore matures by the relatively early age of approximately 6 years and has a moderate lifespan to about 10 to 12 years. The species is highly fecund with up to about 2.6 million eggs per spawning. Spawning takes place throughout the year, with a peak in summer months, in subtropical waters between about 10° N to 25° N latitudes, mostly in the western Pacific, in the vicinity of the Hawaiian Islands, and in some years off Guadalupe Island, Mexico. Growth rates are moderate, with fork lengths at first birthday nearly 40 cm and at sexual maturity at age 6 approximately 90 cm or somewhat less. First recruitment into a fishery is at about age 1 year, when albacore are caught by Japanese surface fisheries in the western Pacific. Pre-adult fish between 2 and 5 years are targeted by surface pole & line and troll fisheries, and undergo extensive migrations in temperate and subtropical waters between the western or central and eastern North Pacific. On the other hand, spawning 6+ year old adults undertake more limited movements in the tropical and subtropical waters mostly within the central and western North Pacific. Adult fish are targeted by longline fisheries.

Albacore, like other tunas, have a number of physiological and morphological specializations that adapt them to a fast, continuous swimming lifestyle in the pelagic open ocean environment. They are endothermic as the result of a counter-current *rete mirabile* heat exchanger system, which enables them to maintain internal core body temperatures up to 10° C warmer than ambient ocean water temperatures. Their metabolic rates are 2 to 10 times higher than most other bony fishes, and they have very large eyes for detecting prey and specialized fins and body form to reduce drag. Albacore are opportunistic carnivores and as adults have few predators, except they are sometimes are believed to be preyed on by large marine mammals, sharks, and billfish.

Albacore are generally considered inherently resilient to fishing pressure because they have a high rate of intrinsic increase, mature at an early age, are highly fecund, are not long-lived, have a broad distributional range, and do not exhibit any characteristics that increase the ease or population consequences of capture, such as aggregating for spawning or exhibiting sequential hermaphroditism (Marsh, 2010).

3.3.2 History of fishing and management

The US surface troll fishery for albacore in the North Pacific began in the early 1900's when fishers commenced targeting seasonally migrating albacore in near-shore oceanic waters off southern California to meet the needs of a tuna cannery established there. The troll fishery gradually spread northwards, but was restricted to waters off California until the late 1930's, when it extended to waters off the states of Oregon and Washington, and eventually to off British Columbia, Canada. Traditionally until the late 1970's, the troll fishery usually began operating in early July, when migrating albacore approach the west coast of North America, and was primarily conducted in near shore oceanic waters. From 1961 through 1979, approximately 99% of the reported US catches of North Pacific albacore were made within 200 miles of the North American coast, with 84% off the US coast and 9% and 7% in the jurisdictional waters of Mexico and Canada, respectively.

Table 1: US commercial landings (metric t) of North Pacific albacore for 1981-2010, by HMS-permitted vessels landing albacore, with bycatch (albacore data from ISC 2011, bycatch data from PFMC 2011b, with additional analysis). Note that some bycatch will originate from HMS fisheries other than the albacore pole & line or troll fisheries.

Year	Albacore	Other Tunas	Sword-fish	HMS Sharks	Dorado	Coastal Pelagics	Other	Total
1981	13,385	14	0	<0.5	<0.5	2	1	13402
1982	7,034	4	4	2	1	<0.5	<0.5	7045
1983	9,966	16	3	1	<0.5	34	1	10021
1984	10,334	13	25	5	<0.5	2	4	10383
1985	7,913	2	11	4	<0.5	<0.5	2	7932
1986	5,140	2	1	<0.5	0	<0.5	1	5144
1987	2,924	<0.5	5	2	0	1	1	2933
1988	4,810	<0.5	18	2	0	<0.5	1	4831
1989	1,914	1	7	8	<0.5	<0.5	2	1932
1990	2,718	<0.5	2	<0.5	<0.5	<0.5	1	2721
1991	1,845	<0.5	2	1	<0.5	0	<0.5	1848
1992	4,572	1	13	2	0	0	<0.5	4588
1993	6,254	18	90	5	9	0	2	6378
1994	10,978	<0.5	1	<0.5	<0.5	0	1	10980
1995	8,125	1	1	<0.5	<0.5	<0.5	1	8128
1996	16,962	42	<0.5	<0.5	<0.5	0	1	17005
1997	14,325	8	1	1	<0.5	<0.5	2	14337
1998	14,489	116	4	3	<0.5	<0.5	2	14614
1999	10,120	24	15	1	<0.5	<0.5	4	10164
2000	9,714	2	22	<0.5	<0.5	<0.5	1	9739
2001	11,349	10	<0.5	1	<0.5	<0.5	6	11366
2002	10,768	2	2	<0.5	<0.5	<0.5	4	10776
2003	14,161	3	0	<0.5	<0.5	<0.5	2	14166
2004	13,473	1	0	<0.5	<0.5	<0.5	3	13477
2005	8,479	<0.5	0	<0.5	0	0	1	8480
2006	12,547	1	0	<0.5	<0.5	<0.5	1	12549
2007	11,908	<0.5	0	0	<0.5	<0.5	1	11909
2008	11,761	6	0	0	<0.5	<0.5	3	11770
2009	12,793	7	<0.5	<0.5	<0.5	<0.5	2	12802
2010	12,004	<0.5	0	<0.5	<0.5		<0.5	12004
Mean 1981-2010	9,426	13	8	2	1	4	2	9,450
Mean 1981-2010 as % of albacore	n/a	0.14	0.08	0.02	0.01	0.04	0.02	n/a
Mean 2001-2010	11,924	4	0	0	<0.5	<0.5	3	11,928
Mean 2001-2010 as % of albacore	n/a	0.03	0.00	0.00	0.00	0.00	0.03	n/a



Since the late 1970's, US albacore fishers with larger vessels may begin troll fishing in the early spring months on the high seas. Some of these vessels operate as far west as the International Dateline and beyond, to extend the fishing season by intercepting albacore migrating towards the coast of North America and locating high catch rate areas. The extent of the albacore migration is variable and a significant characteristic of the US surface fishery is the wide north-south variation in the geographical locations of the most productive fishing grounds. Uniquely, a large proportion of this variability is at the multi-decade rather than the inter-year time scale.

The estimated number of vessels landing albacore peaked at more than 2,000 in the mid-1970s. However, fewer vessels have been active in recent years. During the past five years the number of US pole and troll vessels that landed albacore ranged from 523 and 680 (PFMC 2011b), with vessels smaller than about 17 m outnumbering larger vessels by approximately two to one.

The history of the US pole & line fishery for albacore differs somewhat from that of the troll fishery, and is linked to the US tropical tuna fishery for yellowfin, bigeye, and skipjack tunas. The pole & line method of catching albacore also began in the early 1900's with vessels operating within a one-day run from port to provide product for a tuna cannery located in southern California. A poor catch of albacore in 1918, though, forced pole & line boats to shift to fishing for tropical yellowfin and skipjack to fill the cannery's demand for tuna. In subsequent years even though the availability of albacore may have been high, the amount of pole & line effort expended for albacore was thereafter greatly influenced by events in the tropical tuna fishery. Today there are, fewer than about 35 US vessels using this fishing method for catching North Pacific albacore.

The US surface trolling and pole & line fisheries account for approximately 17% of the North Pacific albacore landed by all nations. The bulk of the catch is canned and marketed as 'white meat' tuna. A relatively small amount of the catch is marketed in the fresh and fresh-frozen trade. The total quantities of albacore landed by the US pole and troll fishery has varied over time, depending mainly on availability of the stock to fishermen and their vulnerability to capture, as well as on the market for albacore (Chip Bissell, AAFA, pers. comm.), but the average annual landings for the last 30 years (9,426 t) is not very different from the average for the last 10 years (11,924 t) (

Table 1).

3.3.3 Status of Stock, assessment methods and standards

The current assessment of the status and expected future trends in the North Pacific albacore stock was completed in June 2011 using fishery data through 2009, and was reviewed by the International Scientific Committee for tuna and tuna-like species in the North Pacific Ocean (ISC) in June, 2011 (WCPFC 2011b). This assessment was conducted using the Stock Synthesis modeling platform (SS3, Version 3.11b) and is based on the assumption that there is a single well-mixed stock of albacore in the North Pacific. It was estimated that the total stock biomass in 2009 was approximately 800,000 t, while the spawning stock biomass was about the historic median of 405,000 t (WCPFC 2011b).

The new model used was a seasonal, length-based, age-structured, forward-simulation population model with a focus on providing reliable estimates of population dynamics and stock abundance. Major changes to model inputs and structure in this assessment relative to an assessment conducted in 2006 include the use of catch-at-length data rather than catch-at-age data. The results derived were similar to those derived from the previous assessment in 2006 and were slightly more optimistic with regard to spawning stock biomass. The SS3 model and the VPA model used in previous assessments were on the current data and both estimated similar historical trends in SSB and recruitment, but with different scaling for biomass. The assessment stated that the scaling difference is largely attributable to the different growth curves used in the SS3 model and the VPA reference run. The Albacore Working Group of the ISC (ALBWG) concluded that the growth curve used in the 2006 assessment is

not representative of growth in North Pacific albacore. Based on the agreement in trends of estimated quantities between the VPA and SS3 base-case model, the ability to explain the scaling differences between models, and the robustness of the stock status and conservation advice to these differences, the WG concluded that the SS3 model will replace the VPA as the principal model for North Pacific albacore assessments.

The Northern Committee (NC) of the WCPFC established an interim management objective for North Pacific albacore in 2008. The objective is to maintain the spawning stock biomass (SSB) above the average of the ten historically lowest estimated points (ATHL) with a probability greater than 50%. The NC requested that the ALBWG evaluate the status of the North Pacific albacore stock against $F_{SSB-ATHL50\%}$ for a 25-yr projection period. $F_{SSB-ATHL50\%}$ is the fishing mortality, F , that will lead to future minimum SSB falling below the SSB-ATHL threshold level at least once during the projection period (2010-2035).

The assessment model estimates that SSB has likely fluctuated between 300,000 and 500,000 t between 1966 and 2009 and that recruitment has averaged 48 million fish annually during this period. The pattern of F -at-age shows fishing mortality increasing to its highest level on 3-yr old fish and then declining to a much lower and stable level in mature fish. Current F (geometric mean of 2006 to 2008, $F_{2006-2008}$) is lower than $F_{2002-2004}$ (current F in the 2006 assessment). Future SSB is expected to fluctuate around the historical median SSB (~405,000 t) assuming F remains constant at $F_{2006-2008}$ and average historical recruitment levels persist. $F_{2006-2008}$ is approximately 30% below $F_{SSB-ATHL50\%}$ and there is about a 1 % risk that future SSB will fall below the SSB-ATHL threshold in at least one year in the projection period, i.e., current F is well below the 50% probability level.

The assessment concluded the North Pacific albacore stock is considered to be healthy at current levels of recruitment and fishing mortality. Since current $F_{2006-2008}$ is about 71% of $F_{SSB-ATHL}$ and the stock is expected to fluctuate around the long-term median SSB (~405,000 t) in the foreseeable future given average historical recruitment levels and constant fishing mortality at $F_{2006-2008}$, the conclusion is that overfishing is not occurring and that the stock likely is not in an overfished condition. However, recruitment is a key driver of the dynamics in this stock and a more pessimistic recruitment scenario increases the probability that the stock will not achieve the management objective of remaining above the SSB-ATHL threshold with a probability of 50%. Thus, if future recruitment declines about 25% below average historical recruitment levels due either to environmental changes or other reasons, then the impact of $F_{2006-2008}$ on the stock is unlikely to be sustainable. Therefore, the assessment recommends maintaining present management measures, including not increasing fishing effort (IATTC C-05-02 and WCPFC CMM 2005-03).

Table 2: Potential reference points and estimated F -ratio using $F_{CURRENT}$ ($F_{2006-2008}$), associated spawning biomass and equilibrium yield. $F_{SSB-ATHL}$ is not equilibrium concept so SSB and yield are given as median levels. (WCPFC 2011b).

Reference Point	$F_{2006-2008}/F_{RP}$	SSB (t)	Equilibrium Yield (t)
$F_{SSB-ATHL}$	0.71	346,382	101,426
F_{MAX}	0.14	11,186	185,913
$F_{0.1}$	0.29	107,130	170,334
F_{MED}	0.99	452,897	94,080
$F_{20\%}$	0.38	171,427	156,922
$F_{30\%}$	0.52	257,140	138,248
$F_{40\%}$	0.68	342,854	119,094
$F_{50\%}$	0.91	428,567	99,643

The F-based reference point $F_{SSB-ATHL}$ is one of a group of simulation-based biological reference points (BRP) using spawning biomass thresholds proposed for North Pacific albacore (ISC/05/ALBWG/06). Unlike other BRPs used in fisheries management, F_{SSB} is not an equilibrium concept and therefore does not assume that future SSB or yield will remain constant at some specified level. As a simulation-based BRP, $F_{SSB-ATHL}$ can incorporate non-equilibrium dynamics, uncertainty in the stock size estimates, and other parameters from the assessment as well as uncertainty in recruitment in future years.

Estimates of $F_{2006-2008}$ (current F) relative to several F-based reference points used in contemporary fisheries management are presented above in Table 2. The estimates are expressed as the ratio of $F_{2006-2008}/F_{ref}$ point, which means that when the ratio is less than 1.0, $F_{2006-2008}$ is below the reference point estimate. The F_{MAX} , F_{MED} and $F_{0.1}$ reference points are based on yield-per-recruit analysis while the F20-50% reference points are spawning biomass-based proxies of F_{MSY} . Since $F_{2006-2008}$ is close to F_{MED} and well below the MSY proxy rates, the assessment infers that overfishing of the North Pacific albacore stock is unlikely at present. Therefore, the current fishing mortality is less than, and in some cases much less than, commonly applied F-based reference points.

3.4 Principle Two: Ecosystem

3.4.1 Background

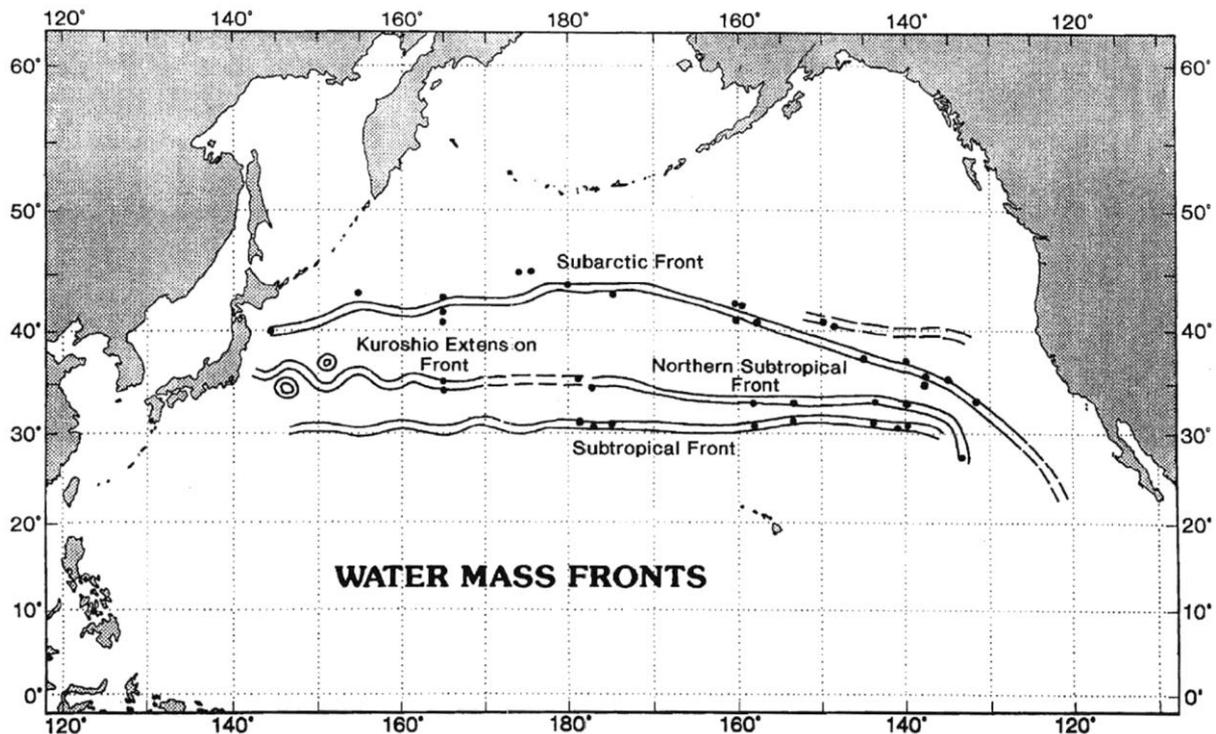


Figure 1: Schematic representation of the major fronts in the temperate zone of the North Pacific based upon numerous individual observations (dots). The transition zone lies between the fronts (Laurs & Lynn 1991).

Albacore inhabit the open-ocean, and spend most of their time in the upper layers above 250 m depth (Childers *et al.* 2011). Albacore distribution, relative abundance and availability to capture are closely

associated with oceanic frontal structure, and the species migrates extensively within the North Pacific Transition Zone (NPTZ), the area that lies between the Subarctic and Subtropical Fronts (Laurs & Lynn 1991, and Figure 1). More specifically, contemporaneous catch, sea-surface temperature and chlorophyll data show that the distribution of albacore within the NPCT appears to be closely linked to the Transition Zone Chlorophyll Front, a permanent, sharp gradient in sea surface chlorophyll that shifts seasonally north and south through the NPTZ (Polovina *et al.* 2001), while in coastal regions their distribution is linked to coastal upwelling boundaries, with albacore being found on the oceanic side of the upwelling boundaries in warmer ($>16^{\circ}\text{C}$) and clearer (<0.3 mgm⁻³ chlorophyll) water (Laurs *et al.* 1984).

Albacore are primarily daytime, visual predators, and are known to feed actively at the surface in coastal areas, thus making them susceptible to the pole and troll fishery (Childers *et al.* 2011). In the California Current off the west coast of the USA., juvenile albacore focus on northern anchovy while also feeding on other fish (mainly Pacific saury, *Cololabis saira*), cephalopod and crustacean species (Glaser 2009). Further offshore, albacore diet has been less intensively studied, but cephalopods and larval fish from the lanternfish and carangid families, as well as small-eye squaretail (*Tetragonurus cuvieri*) and amphipods appear to be important (Laurs & Lynn 1991). As well as humans, predators of adult albacore are believed to be large marine mammals, sharks, and billfishes, while young albacore may also be taken by other larger tunas and fish species (Kitchell *et al.* 1999).

3.4.2 Retained and by-catch species

The pole & line and troll fishing gears employed in the AAFA North Pacific albacore fishery are highly selective; both are employed at the sea surface in deep water such that there is never any contact with the seabed, while the gears always remain attached to the vessel and must be actively fished. Because fish are hauled aboard immediately after they become hooked, fishermen are also quickly able to discern if an albacore shoal being targeted is made up of fish that are too small to be retained for economic or regulatory reasons. In such cases, lines can be pulled in quickly and the vessel moved in search of another shoal containing larger, marketable albacore. Few data are available on bycatch in the fishery, as there is no systematic observer program, but the latest FMP has recommended that the pole and troll fishery is observed in future, with NMFS to develop and review the observer sampling plans (PFMC 2011a).

Landings data from HMS-permitted vessels landing albacore are available from 1960's – 2010. for the years 1981 - 2010 are given (

Table 1). It is important to note that these data are not solely from pole and troll vessels, as they include landings from all HMS-permitted vessels that landed albacore. For example, while it would be highly unusual for pole and troll albacore vessels to catch any swordfish, some albacore may be taken by swordfish boats while travelling to and from the swordfish grounds, at which point the targeted swordfish would be recorded in these data together with any albacore. As such, these data represent the worst case scenario for bycatch in the albacore pole and troll fishery. With that in mind, retained species in the pole and troll fishery may include very small amounts of yellowfin tuna (*Thunnus albacares*), bigeye tuna (*Thunnus obesus*), bluefin tuna (*Thunnus thynnus*), skipjack tuna (*Katsuwonus pelamis*), HMS sharks, dorado (*Coryphaena hippurus*) and unspecified coastal pelagic species. In the last 30 years, the landings of all species or species groups have not exceeded 0.14% by weight of the albacore catch (and this was for swordfish, which is unlikely to have come from the pole and troll fishery, as stated), while the maximum of any species or species group in the last 10 years has been 0.03% by weight of the albacore catch; these quantities are negligible and are considered to pose no risk to the stocks. Nevertheless, the PFMC maintains assessment and

management oversight for the fisheries of tunas, billfishes and sharks undertaken in US waters (PFMC 2011b).

3.4.3 The Northern anchovy baitfish fishery

Fishermen in the AAFA pole and troll fishery may utilise northern anchovy (*Engraulis mordax*) as chum. The northern anchovy may also be used occasionally as bait directly on the hooks, but more usually it is used solely as chum. When pole & line fishing, the northern anchovy are kept alive in tanks and are thrown overboard in small but regular quantities when albacore are located in order to aggregate the fish around the vessel and to excite them to strike artificial baits used on the fishing poles. On troll fishing vessels, northern anchovy are rarely kept alive in tanks, but are typically used frozen instead, with small quantities being thrown overboard when an albacore shoal is located in an attempt to hold the fish near to the surface. While this is not a common practice by troll fishermen, it may be occasionally used at the end of the fishing season. Following MSC guidance, the northern anchovy is considered in this assessment under the retained species components of the assessment (See Section CB3.5.5, MSC 2012).

Northern anchovy may be caught by AAFA fishermen or may be purchased from dedicated commercial bait fishermen who sell live or frozen northern anchovies to commercial and sport fishermen. AAFA fishermen use relatively small lampara nets which have no purse line, whereas commercial bait fishermen use larger nets of a purse seine design. Together, lampara and purse seine nets are termed 'roundhaul' nets, and are set around single-species northern anchovy schools that are visually targeted near to the surface. If being kept alive, the northern anchovy are carefully brailed from the roundhaul net to the bait tanks in small scoops to minimise the risk of any damage. This brailing, and the fact that roundhaul nets are not designed to come in to contact with the seabed at any time, ensures that bycatch and mortality of other species in the northern anchovy fishery is very low, with sardine making up by far the greatest bycatch in observer records of the purse seine fleet from 2004 – 2008 at approximately 5% of the northern anchovy catch (PFMC 2011c).

Northern anchovy can be divided in to northern, central and southern sub-populations. The northern population ranges from San Francisco north to Canada, while the central population extends from San Francisco south to Baja, California. Northern anchovy is managed by the PFMC as a 'monitored' species, meaning that harvest guidelines and quotas are not established, but landings are monitored and the number and capacity of vessels in the fishery is limited, while any changes in management are based on significant changes in the landings or the fishery (NMFS 2011b); a monitored fishery can become 'actively managed' if catches approach the acceptable biological catch (ABC) or maximum sustainable yield (MSY) levels, while overfishing of a monitored CPS stock is considered whenever current estimates or projections indicate that a minimum stock threshold will be realized within two years (PFMC 2011c).

While there is no up to date stock assessment and the most recent complete assessment was described in 1995, the PFMC adopted new management benchmarks for the northern and central subpopulations of northern anchovy in 2010 (PFMC 2011c). The overfishing limits (OFLs) are based on past estimates of biomass and are considered a MSY proxy, while the ABC values account for a 75 % uncertainty buffer in the OFL. The annual catch limit (ACL) was then set at 1500 t for the northern population (Table 3). Catches have varied widely over time (Table 4), but it is considered that the

northern anchovy stocks currently experience limited targeted fishing pressure and relatively low levels of landings, and are not overfished or experiencing overfishing (PFMC 2010).

Table 3: Catch limits for Pacific Fisheries Management Council monitored northern anchovy stocks (PFMC 2011c).

Stock	Overfishing Limit (OFL)	Acceptable Biological Catch	Annual Catch Limit (ACL)	Annual Catch Target (ACT)
Northern anchovy, northern subpopulation	39,000 mt	9,750 mt	Equal to ABC	1,500 mt
Northern anchovy, central subpopulation	100,000 mt	25,000 mt	Equal to ABC	

Table 4: West coast landings (t) of northern anchovy, 1981 – 2010 (PFMC 2011d).

Year	Northern anchovy (t)	Year	Northern anchovy (t)	Year	Northern anchovy (t)
1981	52,309	1991	4,068	2001	19,345
1982	42,155	1992	1,166	2002	4,882
1983	4,430	1993	2,003	2003	1,929
1984	2,899	1994	1,859	2004	7,019
1985	1,638	1995	2,016	2005	11,414
1986	1,557	1996	4,505	2006	12,960
1987	1,467	1997	5,779	2007	10,548
1988	1,518	1998	1,584	2008	14,654
1989	2,511	1999	5,311	2009	3,519
1990	3,259	2000	11,832	2010	1,284

Albacore fishermen operating in waters off Washington and Oregon are required to report anchovy harvest through logbook submissions on albacore catches, but there is no such requirement in California. Because of this, and because the commercial bait catch may be used in other fisheries, there are no data available on the quantity of northern anchovy taken for use in the albacore pole and troll fishery. In order to quantify bait usage, three experienced AAFA fishermen were asked to estimate how much northern anchovy would be used by the AAFA fleet during a fishing year. Two of the fishermen interviewed principally operate pole & line gear, while the other fisherman principally operates trolling gear. The fishermen were asked to describe the pole & line and troll fishing operations with respect to the use of northern anchovy, including the season for using Northern anchovy, the average number of trips per year during which anchovy are used, and the amounts used per trip; their comments are recorded in Table 5, below.

By taking the greatest amounts estimated by the fishermen for each answer (number of trips, number of scoops and average scoop weight), and assuming that the bait tanks are filled to capacity and all the northern anchovy are used on each trip (which is not the case), an annual total of less than 250 t of northern anchovy would be used. However, by using the median answers to the questions, the total tonnage of northern anchovies used is approximately 130 t per year, again assuming that the bait tanks

are filled to capacity that all the northern anchovy are used on each trip. These figures are small and represent no threat to the northern anchovy stocks in the context of the US fisheries that produce an estimated 1,000 t – 3,000 t of northern anchovy that are sold as dead bait to sport fishermen, and the approximately 4,000 t of mixed sardine and northern anchovy that are sold live to sport fishermen (PFMC 2011c).

Table 5: Bait usage by the AAFA fleet as estimated by experienced AAFA fishing captains.

	Captain 1 (Pole & Line)	Captain 2 (Pole & Line)	Captain 3 (Troll)
Number of P&L vessels	20 - 25 (varies according to year and how fish respond to bait)	20 - 25 (varies according to year and how fish respond to bait)	
Season for making (catching) bait for P&L vessels	End August - early November (season end depends on weather)	End August - early November (season end depends on weather)	
Number of fishing trips in P&L season	Up to 10 (but bait will not be 'made' (caught) before every trip)	Approximately 7	
Scoop weight	5 lb (scoop size is 8 lb officially, but smaller scoops are used to avoid damage to anchovy)	6 - 8 lb	
Number of scoops taken per trip across P&L fleet	Not asked	150 – 250 (large vessels may take more, but the average is probably at the low end)	
Maximum tonnes used by P&L vessels per annum (based on maximum values)	226 t (25 vessels x 10 trips x 250 scoops x 8 lb)/2205	159 t (25 vessels x 7 trips x 250 scoops x 8 lb)/2205	
Average tonnes used by P&L vessels per annum (based on answers)	104 t (23 vessels x 10 trips x 200 scoops x 5 lb)/2205	102 t (23 vessels x 7 trips x 200 scoops x 7 lb)/2205	
Number of Troll vessels using bait			30-50 % of the fleet (therefore 10 - 25 vessels)
Amount of bait used per troll trip			Average 180 lb (6 frozen boxes of 30 lb)
Number of troll trips where bait is used			Not asked (but assumed to be up to 10, as pole & line vessels)
Season for trolling with bait?			Common September to end of season. Uncommon earlier in the year.
Maximum tonnes used by troll vessels per annum (based on answers)			20 t (25 vessels x 10 trips x 180 lb) /2205

3.4.4 Endangered, threatened and protected (ETP) species

ETP species of potential relevance to the AAFA North Pacific albacore fishery include a variety of marine mammal, sea turtle and seabird species. These species and identified threats are listed in Table 6, below. Interactions between ETP species and the AAFA pole and troll fishery are highly unlikely, given the very high selectivity of the gear. In particular, the pole & line fishery is a sight-fishing fishery, where individual fish can be targeted, and so no ETP species should be taken. Trolling is also highly selective, and the jigs used should preclude the catching of any marine mammal or turtle species other than possibly through accidental snagging. However, this risk is minimal and the pole and troll fisheries are not identified in any recovery or spotlight species action plan (Table 6). It is thought that perhaps one loggerhead turtle may be caught in the albacore pole and troll fishery per year (based on two observations in more than 1500 observed days of effort), but that no turtle would die as a result of an interaction with the fishery (NMFS 2004).

The US National Bycatch Report assessed the North Pacific albacore pole & line fishery as being a Tier 0 fishery for bycatch of fish, marine mammals and other protected species, while the troll fishery was deemed to be in Tier 1 for the same animal groups (NMFS 2011a). Tier 0 classification was stated as meaning that bycatch data collection programs have not been implemented, and that neither a method for estimating bycatch nor estimates of bycatch are available. Tier 1 classification is stated as typically meaning that bycatch estimates are based on outdated or unreliable information. However, the 2012 NOAA ‘List of Fisheries’, that as a requirement of the Marine Mammal Protection Act (1972) classifies US fisheries as being in Category I (“*frequent incidental mortality and serious injuries of marine mammals*”), Category II (“*occasional incidental mortality and serious injuries of marine mammals*”) or Category III (“*a remote likelihood or no known incidental mortality and serious injuries of marine mammals*”) assessed the North Pacific albacore pole and troll fisheries as Category III, with no marine mammal species or stocks killed or injured (NOAA 2011a).

Table 6: ETP species of potential relevance to the AAFA North Pacific albacore pole and troll fishery.

Common Name	Scientific Name	ESA Conservation Status	Identified Threats	Albacore pole and troll fisheries identified?
Marine Mammals				
Blue whale	<i>Balaenoptera musculus</i>	Endangered	Identified human impacts including ship collision, disturbance by vessels, entanglement in nets and trap fishing gear, habitat degradation, and military operations (Reeves <i>et al.</i> 1998).	No
Finback whale	<i>Balaenoptera physalus</i>	Endangered	“No conservation plans have been created for finback whale” (USFWS 2012a).	No
Humpback whale	<i>Megaptera novaeaealiae</i>	Endangered	Identified human impacts include entanglement in fishing gear, subsistence hunting, ship collision, acoustic disturbance, habitat degradation, and competition with humans for resources (NMFS 1991).	No
Killer whale (Southern resident DPS)	<i>Orcinus orca</i>	Endangered	Identified impacts include prey availability, environmental contaminants, vessel effects including collision and sound, oil spills, alternative energy projects and disease (NMFS 2008a).	No
Sei whale	<i>Balaenoptera borealis</i>	Endangered	“No conservation plans have been created for sei whale” (USFWS 2012b).	No
Sperm whale	<i>Physeter catodon</i>	Endangered	“No conservation plans have been created for sperm whale” (USFWS 2012c).	No
Guadalupe fur seal	<i>Arctocephalus townsendi</i>	Threatened	“No conservation plans have been created for Guadalupe fur seal” (USFWS 2012d).	No
Steller sea-	<i>Eumetopias</i>	Threatened	Identified impacts include intentional and illegal killing,	No

lion (Eastern	<i>jubatus</i>	(East of 144 ⁰ W. Longitude)	incidental fishery take (gillnet, trawl, longlines and salmon trolling) (NMFS 2008b)	
Sea turtles				
Green turtle (East Pacific)	<i>Chelonia mydas</i>	Threatened	Identified impacts include directed take, coastal construction and light pollution, nest predation, habitat degradation, environmental contaminants, debris entanglement and ingestion, incidental take in fisheries (trawls, gillnets, traps, pound nets, seines, driftnets and longlines), predation, power plant entrapment and boat collisions (NMFS 1998a).	No (but hook & line in list of gears that <u>may</u> catch green turtles (NMFS 1998a))
Leatherback turtle	<i>Dermochelys coriacea</i>	Endangered	Identified impacts include directed take, coastal construction and light pollution, nest predation, habitat degradation, environmental contaminants, debris entanglement and ingestion, incidental take in fisheries (gillnets and longlines), predation and boat collisions (NMFS 1998b).	No
Loggerhead turtle	<i>Caretta caretta</i>	Threatened	Identified impacts include directed take, coastal construction and light pollution, nest predation, habitat degradation, environmental contaminants, debris entanglement and ingestion, incidental take in fisheries (trawls, gillnets, traps, pound nets, seines, driftnets and longlines), predation, power plant entrapment and boat collisions (NMFS 1998c).	No (but hook & line in list of gears that <u>may</u> catch loggerhead turtles (NMFS 1998c))
Olive Ridley turtle	<i>Lepidochelys olivacea</i>	Threatened	Identified impacts include directed take, coastal construction and light pollution, nest predation, habitat degradation, environmental contaminants, debris entanglement and ingestion, incidental take in fisheries (trawls, gillnets, traps, pound nets, seines, driftnets and longlines), predation, power plant entrapment and boat collisions (NMFS 1998d).	No (but hook & line in list of gears that <u>may</u> catch olive ridley turtles (NMFS 1998d))
Seabirds				
Marbled murrelet	<i>Brachyramphus marmoratu</i>	Threatened	Primary identified cause of decline is loss of nesting habitat. Oil spills, gill-net fishing, marine pollution and predation are considered to be additional causes of decline (USFWS 2009a).	No
Short-tailed albatross	<i>Phoebastria albatrus</i>	Endangered	Identified threats include reduced productivity and competitive exclusion of chicks on breeding islands, contaminants, bycatch in commercial fisheries (longlining specifically identified) and predation (USFWS 2009b).	No

Bycatch of albatross was raised as a concern by an individual stakeholder during the third annual surveillance audit of the first AAFA North Pacific albacore fishery certificate (Powers *et al.* 2010). At that time, Southwest Fisheries Science Center (SWFSC) staff examined 37,750 daily logsheets from 2000 and 24,530 daily logsheets from 2005, and only two interactions between the North Pacific albacore pole and troll fisheries and albatross were found; in both cases, the birds were released. There was no information available on the species of albatross or on the condition of the birds upon release, but there is much greater potential for the birds to be released alive and in good health from pole and troll gears than from gears such as long-line or drift nets, because the pole and troll gears would be retrieved immediately upon hooking a bird. However, during the October 2011 reassessment meeting, SWFSC staff noted that there is a negligible potential for interactions between the AAFA North Pacific pole and troll fishery and seabirds, while albacore pole and troll fisheries were not implicated in a 2005 review of RFMO performance against albatross bycatch (Small 2005).

In summary, the highly selective nature of the gear types, information provided in the various recovery and species action plans highlighted in Table 6, the lack of any recommendations made

regarding a need to collect more data on catches in the North Pacific albacore pole and troll fisheries in the US National Bycatch Report (NMFS 2011a), and the 'List of Fisheries' assessment (NOAA 2011a), it is highly unlikely that the albacore pole and troll fisheries pose a threat to ETP species.

3.4.5 Habitat and ecosystem effects

The AAFA pole and troll fishery is highly selective, and operates at the surface in deep, oceanic water; there is therefore no interaction with the seabed, while the gear comprises short lines with jigs or live bait attached, which at most can impact the surface pelagic habitat of the North Pacific in an imperceptible and highly transient manner. There is negligible catch of other retained or discarded species. The northern anchovy that is used for bait is an important forage fish species within the California Current System inshore, but the amounts used for bait in the AAFA pole and troll fishery are small relative to other uses. Please note, northern anchovy is considered to be a retained species, and there is no MSC requirement to assess the baitfish fishery itself (e.g., at PI 2.3.x [ETP species impacts]. PI 2.4.x [habitat impacts] or PI 2.5.x [ecosystem impacts]).

Albacore is an important predator of northern anchovy in coastal areas off the western USA, and it has been suggested that albacore consume 0.1 % - 5 % of juvenile northern anchovy annual recruitment biomass, a figure that is sufficiently high to be observed in the subsequent year's northern anchovy recruitment strength (Glaser 2009). However, there is no indication that the removal of albacore by the AAFA fleet adversely affects northern anchovy or other stocks of small, prey species. Conversely, albacore is also not a key prey item for any species in the North Pacific (Kitchell *et al.* 1999), and the fishery appears very unlikely to significantly impact other higher trophic-level predators.

3.5 Principle Three: Management System

3.5.1 Background

The North Pacific albacore resource is distributed in ocean areas that encompass multiple zones of national jurisdiction, as well as the high seas, and are exploited by fisheries of many Nations. As such, international agreement is necessary to conserve North Pacific albacore tuna stocks and to ensure the viability of the fisheries.

Article 64 of the United Nations Law of the Sea Convention mandates States to cooperate directly, or through appropriate international organizations, to ensure the conservation of tunas. International management of the North Pacific albacore tuna resource and fisheries operating on it are shared under the auspices of the Inter American Tropical Tuna Commission (IATTC) and the Western and Central Pacific Fisheries Commission (WCPFC). The Commissions formulate overarching resolutions based on recommendations from scientific committees or staff. Member states negotiate agreements on management mechanisms and, once agreed upon, the actual implementation is left to the individual member and cooperating countries.

The Northern Committee (NC) of the WCPFC makes recommendations on the implementation of conservation and management measures that may be adopted by the Commission for the area north of 20°N, including those for North Pacific albacore. The NC has also subsumed the Interim Scientific Committee (ISC), a forum to study the tuna and tuna-like species of the North Pacific Ocean, as its main source of scientific advice.

In 2005 the IATTC and the WCPFC adopted resolutions, which have been continued through the present time, for conservation of North Pacific albacore based on concerns that fishing effort may be approaching levels that are unsustainable in the long term. Resolutions adopted by both Commissions called upon their members and cooperating parties to take necessary measures to ensure that the level of fishing effort by their vessels fishing for North Pacific albacore is not increased beyond current levels, and to report all catches of North Pacific albacore to the Commissions at 6-month intervals. IATTC C-05-02 (IATTC 2005) requires that:

- The total level of fishing effort for North Pacific albacore tuna in the Eastern Pacific Ocean not be increased beyond current levels. At the 2008 IATTC meeting it was recommended that the fishing mortality averaged for 2002-2004 be used as the “current” fishing mortality as applies to (1).
- The CPCs [IATTC parties, cooperating non-party, fishing entity or regional economic integration organization] shall take necessary measures to ensure that the level of fishing effort by their vessels fishing for North Pacific albacore tuna is not increased;
- All CPCs shall report all catches of North Pacific albacore tuna by gear type to the IATTC every six months. However, since the limit in the resolution is in terms of effort, the six-monthly reports include information on effort as well as catch, in terms of the most relevant measures for a given gear type. The technical aspects of the effort data to be supplied could be established by the IATTC in collaboration with scientists of the interested member countries.

WCPFC CMM 2005-03 (WCPFC 2005) requires similar actions be followed by Commission Members, Cooperating Non-Members, and participating Territories that conduct fishing operations for albacore in the Convention area north of 20⁰ N.

The Pacific Fishery Management Council (PFMC) has the lead to adopt management actions regarding the US West Coast albacore fishery. The US West Coast albacore fishery is managed under the PFMC Highly Migratory Species Fishery Management Plan (HMS FMP). The management measures presently in place on the fishery, which apply to vessels fishing for albacore in the EEZ off the West Coast as well as when fishing on the high seas and landing their catch in West Coast states, include the following:

- A Pacific HMS fishing permit, with an endorsement for a specific gear and other accompanying provisions, is required by all commercial and recreational charter fishing vessels fishing for North Pacific albacore. Permits are issued to the owner of a specific vessel for a 2-year term and are renewable.
- A High Seas Fishing Compliance Act valid permit is required by all commercial and recreational charter fishing vessels fishing for albacore on the high seas. Permits are issued to a specific vessel for a 5-year term and are renewable.
- All Pacific HMS permit holders must maintain and submit to NMFS a daily logbook of catch and effort and catch disposition.
- The HMS FMP prohibits all pelagic longline fishing within the West Coast EEZ as well as shallow-set longline fishing in the adjacent high seas areas.



- All U.S. fishing vessels operating in HMS fisheries may be required to carry a NMFS certified observer on board to collect scientific data when directed to do so by the NMFS Regional Administrator.
- A US-Canada Albacore Tuna Treaty, which was initially put into effect in 1981, codified by law in 1984, and amended several times, expired at the end of the 2011 and is not in effect during the 2012 fishing season. The Treaty allowed, with conditions, fishing vessels of both countries to fish for North Pacific albacore in the respective EEZ waters outside 12 miles of the other country and to access certain ports to obtain supplies and services and to land their catch. The Treaty also called for exchange of fisheries data between the governments of the two nations and establishes regulations to ensure compliance by albacore tuna fishing vessel operators when operating in the other country's waters. Discussions to negotiate a new Treaty are currently (July 2012) underway.
- The US recreational albacore fishery is managed by daily bag limits of 10 albacore per angler south, and 25 albacore per angler north, of Point Conception, CA.
- The NOAA/NMFS compiles and makes reports to the respective Commissions of data on U.S. vessel fishing effort in compliance with IATTC C-05-02 and WCPFC CMM 2005-03.
- Oregon and California require State commercial fishing licenses to fish for or land albacore; Oregon also has an albacore fishing licence when landing only albacore. No State fishing license is required to fish for albacore in Washington.

4 Evaluation Procedure

4.1 Previous Assessments

The AAFA North Pacific albacore pole and troll fishery was previously certified against the MSC Principles and Criteria as sustainable in 2007. At that time, the fishery was assessed against the MSC Fishery Certification Methodology Version 6, and a non-standard assessment tree was used that defined 76 separate Performance Indicators (PIs) across the three MSC Principles. The three Principles were scored:

Principle 1 (Sustainability of the Exploited Stock):	82.0
Principle 2 (Maintenance of the Ecosystem):	92.0
Principle 3 (Effective Management System):	95.0

One Performance Indicator (PI), PI 1.1.4.1, Status of Stock, was scored at 75 in the 2007 assessment, and so a Condition of Certification was set against the fishery, as detailed below.

2007 assessment of the AAFA North Pacific albacore fishery

Condition 1. Status of Stock (Relevant Scoring Indicator: 1.1.4.1 - Score 75)

Action required: The present stock assessment suggests that the stock may be “either fully exploited or sustaining fishing mortality above levels that are sustainable in the long term”. Accordingly, management resolutions have been provided by IATTC/WCPFC for a cap on existing effort and expedited reporting of catches. Also, a re-examination of stock assessment data has been initiated by ISC. It is recognised that maintaining the stock at or above a precautionary reference limit is not under the control of AFA and therefore actions required of AAFA in this regard are:

AAFA to promote and support the management actions put forward, notably limitations on effort. Communications supporting such management measures should be made to appropriate organisations. Records should be provided by AAFA of communications and responses.

AAFA to provide a summary to Moody Marine on US’s responses to IATTC/WCPFC management resolutions, as provided by NMFS and/or Pacific Fishery Management Council.

A meeting of ISC Albacore Working Group was held in December 2006, and is due to report in March 2007. This will provide updated information on stock status and, depending on the latest information, may make further recommendations for management actions.

Should the existing resolution be withdrawn following the ISC report, then this condition would be considered closed.

If additional resolutions are proposed, then these should be supported as in 1, above.

Timescale:

Point 1. If still appropriate, should be pursued immediately upon certification.

Point 2. AAFA should provide this information within 6 months of certification.

Point 4. Should further resolutions be passed by IATTC/WCPFC in this regard, supportive actions should be initiated at the earliest possible opportunity thereafter.

This single Condition against the first AAFA certificate was closed out in the 2nd annual surveillance audit in 2009, at which point the following conclusion was made:

“AAFA has exhibited extensive, broad, and consistent efforts in promoting and supporting both domestic and international responsible management actions regarding the North Pacific albacore resource. The stock status has also been revised as being at high abundance. All elements of this Condition of Certification have therefore been met.”

No further Conditions were set against the AAFA North Pacific albacore pole and troll fishery during the period of the first assessment from 2007 - 2012. As such, the fishery was deemed to be meeting the MSC standard at the point at which it entered into reassessment on September 16th 2011.

4.2 Harmonised Fishery Assessment

The MSC requires that assessments are harmonised for fisheries that overlap. An overlap occurs when some or all of the same stock, environmental and/or management concerns covered by MSC Principles 1, 2 and/or 3 are the same as that/those of another MSC certified fishery or fishery in assessment. In essence, harmonisation requires that the assessment trees used are the same or complementary, and that outcomes with respect to evaluation, scoring and conditions are consistent between the fisheries. Full details are available in the Section 27.4.13 and Annex CI of the CR (MSC 2012).

4.2.1 Fisheries of potential harmonisation relevance

There are a number of MSC fisheries that may be considered to be of potential harmonisation relevance with respect to AAFA’s North Pacific albacore pole and troll fishery. These are shown in Table 7, below. It is noted that the previous assessment of the AAFA North Pacific fishery cannot be compared directly, PI by PI, against this new assessment because the previous assessment was undertaken against a non-standard, pre-FAM assessment tree.

Table 7: MSC fisheries of potential harmonisation relevance to the AAFA North Pacific albacore pole and troll fishery.

Fishery	Species	Stock/Region	Certified	Relevant to harmonisation?
American Western Fishboat Owners albacore tuna	Albacore tuna (<i>Thunnus alalunga</i>)	North Pacific Ocean US EEZ and the North Pacific	Yes (March 2010)	Yes (Same stock)
Canadian Highly Migratory Species Foundation British Columbia albacore tuna	Albacore tuna (<i>T. alalunga</i>)	North Pacific Ocean Canadian EEZ and the North Pacific	Yes (March 2010)	Yes (Same stock)
Tosakatsuo Suisan pole & line skipjack tuna	Skipjack tuna (<i>Katsuwonus pelamis</i>)	Central and North Pacific Ocean FAO statistical areas 61 and 71	Yes (November 2009)	No (Different species)
New Zealand albacore tuna troll	Albacore tuna (<i>T. alalunga</i>)	South Pacific Ocean Western coast of New Zealand, part of FAO statistical area 81, inside the NZ EEZ	Yes (May 2011)	Yes (Different stock but recent MSC condition setting guidance used)

Fiji albacore tuna longline	Albacore tuna (<i>T. alalunga</i>)	South Pacific Ocean FAO statistical areas 71, 77 and 81	No (In assessment)	No (Different stock)
Mexico Baja California pole & line yellowfin and skipjack tuna	Yellowfin tuna (<i>T. albacares</i>) Skipjack tuna (<i>K.pelamis</i>)	Eastern Central Pacific FAO statistical area 77	Yes (July 2012)	No (Different species)

4.2.2 Harmonisation considerations

The American Western Fishboat Owners (WFOA) albacore fishery and the Canadian Highly Migratory Species Foundation (CHMSF) albacore fishery were certified in March 2010, using the Fishery Assessment Methodology (FAM) V.1 default assessment tree. The assessment results of these fisheries were considered in detail during the 2010 3rd annual surveillance audit of the AAFA North Pacific albacore fishery. The full report is available from the MSC website (Powers *et al.* 2010).

Key findings of the harmonisation review of the WFOA and CHMSF North Pacific albacore fisheries undertaken during the AAFA third surveillance audit in 2010 can be summarised as follows:

- In comparison, the substantive points of the AAFA and WFOA/CHMSF fishery conditions were near identical. AAFA and the WFOA/CHMSF were required to promote and support management actions, notably limitations on effort; communications were to be made to appropriate organisations; records of these communications were then to be provided to the certification bodies
- The action plans of the CHMSF and WFOA North Pacific fisheries appeared to be somewhat similar or very similar to the action plan of the AAFA North Pacific fishery.
- Overall, Moody Marine Ltd. considered that there was no reason why the certificate holders of the AAFA, WFOA and CHMSF fisheries should not function similarly in respect of their certificates for North Pacific albacore.

The WFOA and CHMSF fisheries overlap with the AAFA North Pacific albacore fishery, and their assessment findings were considered in detail by the team assessing the AAFA fishery. It was, though, noted that the CR (MSC 2012) contains guidance for condition setting, first introduced through the MSC TAB Directive 33 (MSC 2011b) that was not available for any of the fisheries of potential harmonisation relevance other than the New Zealand albacore troll fishery. The WFOA and CHMSF fisheries were certified prior to the publication of the MSC TAB Directive 33. As such, and although there is no strict requirement to harmonise with the New Zealand fishery because it targets a different albacore stock and therefore does not overlap with the AAFA North Pacific fishery, the assessment approach and findings of the New Zealand fishery were also studied carefully by the AAFA fishery's assessment team.

More details of the harmonisation review are provided in Table 14 on page 110 of this report. The assessment team can conclude that although there are a number of somewhat significant differences in scoring (i.e., when the score of a PI was ≥ 15 points different between fisheries, or when scores were awarded on different sides of the SG80 boundary), there were good reasons for those differences as reflected in the evidence available.

4.3 Assessment Methodologies

This reassessment of the AAFA North Pacific albacore pole and troll fishery used the MSC Certification Requirements Version 1.2 (MSC 2012), while the report was based on the MSC Full Assessment Reporting Template Version 1.0. No changes were made to the default assessment tree in assessing the fishery against the MSC Principles and Criteria.

4.4 Evaluation Processes and Techniques

4.4.1 Site Visits

The site visit for AAFA's North Pacific albacore pole and troll fishery reassessment occurred from the 26th – 28th October 2011. An advertisement was previously placed in the San Diego Daily Tribune on the 26th – 28th September inclusive. The Daily Tribune was selected as a media outlet for the advertisement as a business-focussed newspaper with a readership estimated at over 50,000 people per day (EM 2012). Confirmation of the placement of the advertisement is shown in Appendix 3.

A site visit notification was also posted to the MSC website on the 14th October, as shown in Appendix 4. Because the notification was posted to the MSC website within 30 days of the site visit, alternative dates of the 23rd and 24th November were offered to stakeholders. It was not realised at the time that these alternative dates included Thanksgiving, an important US national holiday, but no stakeholders contacted the assessment team to ask for a meeting or teleconference on those dates or to ask for separate dates to be arranged.

During the site visit, meetings were held with AAFA, NMFS staff and with a member of the Pacific Fisheries Management Council. The dates, persons involved and issues discussed are shown in Table 8, below.

Table 8: Meetings conducted during the 2011 reassessment site visit.

Date	Organisation	Attending	Issues Discussed
26/10/2011	AAFA Intertek Moody Marine Ltd Intertek Moody Marine Ltd Intertek Moody Marine Ltd	Mr. Chip Bissell Dr. Rob Blyth-Skyrme Dr. Norman Bartoo Dr. Mike Laurs	<ul style="list-style-type: none"> • Reassessment process • AAFA fishery data • The fishing method • Albacore stock status • Stakeholder concerns • AAFA's engagement with fishery managers
27/10/2011	AAFA Intertek Moody Marine Ltd Intertek Moody Marine Ltd Intertek Moody Marine Ltd SWFSC, NOAA SWFSC, NOAA SWFSC, NOAA SWFSC, NOAA SWFSC, NOAA NMFS SW Region	Mr. Chip Bissell Dr. Rob Blyth-Skyrme Dr. Norman Bartoo Dr. Mike Laurs Dr. Dale Sweetnam Dr. John Childers Dr. Steven Teo Dr. Stephen Stohs Dr. Russ Vetter Dr. Craig Heberer	<ul style="list-style-type: none"> • Reassessment process • The fishing method • Albacore stock status • The stock assessment model • Bycatch in the fishery • Anchovy bait fishery • ETP species interactions • Observer coverage • Management of the fishery
27/10/2011	AAFA AAFA Intertek Moody Marine Ltd Intertek Moody Marine Ltd Intertek Moody Marine Ltd	Mrs. Natalie Webster Mr. Chip Bissell Dr. Rob Blyth-Skyrme Dr. Norman Bartoo Dr. Mike Laurs	<ul style="list-style-type: none"> • Reassessment process • Harmonisation • The fishing method • AAFA fishery data • Management of the fishery

			<ul style="list-style-type: none"> • AAFA's engagement with fishery managers
28/10/2011	AAFA Intertek Moody Marine Ltd Intertek Moody Marine Ltd Intertek Moody Marine Ltd PFMC	Mr. Chip Bissell Dr. Rob Blyth-Skyrme Dr. Norman Bartoo Dr. Mike Laurs Ms. Marija Vojkovich	<ul style="list-style-type: none"> • Reassessment process • Management of the fishery • AAFA's engagement with fishery managers

4.4.2 Consultations

A number of stakeholders who previously expressed an interest in the AAFA North Pacific fishery certification were contacted prior to the commencement of the reassessment. Other potential new stakeholders were also contacted. The full list of those individuals and organisations contacted is contained below in Table 9.

Table 9: Stakeholders and potential stakeholders contacted by e-mail prior to the commencement of the AAFA North Pacific albacore fishery reassessment.

Date	Individual	Organisation
29/9/2010	Dr. Bill Fox	WWF
29/9/2010	John Hall	N/a
29/9/2010	Peter Flournoy	Western Fishboat Owners Association (WFOA)
29/9/2010	David Garforth	Global Trust Certification
30/9/2010	Susan Jackson	ISSF
30/9/2010	No named individual	IATTC
30/9/2010	No named individual	WCPFC
30/9/2010	Douglas Loder	Tuna Management Association of New Zealand

No stakeholders requested a meeting or teleconference with the team on either set of dates that was offered for the site visit. The World Wildlife Fund (WWF) and the International Seafood Sustainability Fund (ISSF) did, though, submit letters to the assessment team prior to the site visit; these letters are included as Appendix 7 and Appendix 8 respectively. The letter from WWF highlighted concerns regarding the absence of explicit reference points for management of the North Pacific albacore fishery, the closure of the Condition that was set on AAFA's North Pacific fishery when it was certified in 2007, the management of the anchovy baitfish fishery, and the structure and international nature of the albacore management regime. Similar concerns were expressed by the ISSF in their letter, with the exception of the first point.

4.4.3 Evaluation Techniques

The team assessing the AAFA North Pacific albacore fishery include individuals with a demonstrably long history of involvement in albacore fishery science and management at a senior level. As such, there was no requirement for the assessment team to acquire a working knowledge of the management operation and sea-base prior to undertaking the assessment.

The scoring process for the assessment has involved undertaking a preliminary scoring review immediately following the site visit, where initial findings were discussed. As leads for Principle 1, 2 and 3, Dr. Bartoo, Dr. Blyth-Skyrme and Dr. Laurs led the scoring discussions for those Principles respectively. The team then wrote their sections of the report and provided scores for their PIs, before each team member reviewed and confirmed their agreement with the findings and the scores awarded for the other sections. Hence, it is important to note that while each assessment team member led the



assessment of the fishery for their Principle, the team as a whole has taken responsibility for the final score awarded to each PI.

With respect to setting the Conditions of Certification, the assessment team was guided by the CR (MSC 2012) while also closely considering the findings of the New Zealand albacore troll fishery (Medley *et al.* 2011).

The RBF was not used in scoring any PI of AAFA's North Pacific albacore fishery.



5 Traceability

5.1 Eligibility Date

It is intended that, if recertified, North Pacific albacore landed by the AAFA fleet will be eligible from the date on which the existing AAFA North Pacific albacore certificate expires, which is now December 24th, 2012, having been extended by four months from August 24th 2012 (http://www.msc.org/track-a-fishery/certified/pacific/aafa-pacific-albacore-tuna-north/reassessment-downloads-1/20120918_Var_Resp_TUN3.pdf). This would maintain continuity in the fishery and allow for the AAFA to maintain an unbroken period of certification.

5.2 Traceability within the Fishery

Traceability within the AAFA North Pacific albacore fishery is considered to be excellent. All albacore are landed as blast or brine frozen whole fish, no processing takes place at sea and although transshipment is permitted, this occurs very rarely if at all and with reporting required. The limit of identification of landings is the landing of albacore by AAFA member vessels, or other US pole and troll vessels identified by AAFA as being part of the certified fishery.

The certified North Pacific albacore fishery covers the North Pacific albacore stock wherever it occurs and, while albacore are taken in the South Pacific, including by AAFA members, the AAFA South Pacific albacore fishery is currently certified and is seeking recertification, and vessels must transit thousands of miles from the US West Coast in order to fish on the South Pacific grounds. As such, there is considered to be very little incentive or potential for fish other than North Pacific albacore to enter the AAFA North Pacific albacore chain of custody.

In addition to MSC certification, AAFA is a marketing body focused on product quality, and every landing is coded and can be traced back to a specific vessel and date of landing, so allowing any quality concerns to be resolved quickly. This tracing supports the view that there is almost no potential for non-certified fish to be introduced to the supply chain or for transshipment to occur.

5.3 Eligibility to Enter Further Chains of Custody

Eligibility to participate in the AAFA North Pacific albacore fishery is determined by membership of AAFA. AAFA membership has varied somewhat over time, but stands at 59 vessels in November 2012 (see Table 15). Those vessels may land at a small number of unloading stations on the Washington, Oregon and California coasts, where appropriate recording and monitoring of catches takes place. For 2012, the unloading stations are identified as:

- Bornstein Seafood
- Caito Fisheries
- Coos Bay Trawlers Marketing Division
- Driscoll's Wharf
- Ilwaco Landing
- Jolly Roger Seafood
- Pacific Seafood
- Trident Seafoods
- Westport Seafood

Fishery products are certified up to the point of landing, but will be eligible to enter further certified chains of custody.

6 Evaluation Results

6.1 Principle Level Scores

Table 10: Final Principle Scores

Final Principle Scores	
Principle	Score
Principle 1 – Target Species	85.0
Principle 2 - Ecosystem	95.3
Principle 3 – Management System	94.4

6.2 Summary of Scores

Prin- ciple	Wt (L1)	Component	Wt (L2)	PI No.	Performance Indicator (PI)	Wt (L3)	Weight in Principle	Score			
One	1	Outcome	0.5	1.1.1	Stock status	0.5	0.25	100			
				1.1.2	Reference points	0.5	0.25	70			
				1.1.3	Stock rebuilding			n/s			
		Management	0.5			1.2.1	Harvest strategy	0.25	0.125	85	
						1.2.2	Harvest control rules & tools	0.25	0.125	60	
						1.2.3	Information & monitoring	0.25	0.125	100	
						1.2.4	Assessment of stock status	0.25	0.125	95	
		Two	1	Retained species	0.2	2.1.1	Outcome	0.333	0.0667	100	
2.1.2	Management					0.333	0.0667	100			
2.1.3	Information					0.333	0.0667	95			
Bycatch species	0.2					2.2.1	Outcome	0.333	0.0667	100	
						2.2.2	Management	0.333	0.0667	90	
						2.2.3	Information	0.333	0.0667	80	
ETP species	0.2					2.3.1	Outcome	0.333	0.0667	100	
						2.3.2	Management	0.333	0.0667	85	
						2.3.3	Information	0.333	0.0667	80	
Habitats	0.2					2.4.1	Outcome	0.333	0.0667	100	
						2.4.2	Management	0.333	0.0667	100	
						2.4.3	Information	0.333	0.0667	100	
Ecosystem	0.2					2.5.1	Outcome	0.333	0.0667	100	
						2.5.2	Management	0.333	0.0667	100	
						2.5.3	Information	0.333	0.0667	100	
Three	1			Governance and policy	0.5		3.1.1	Legal & customary framework	0.25	0.125	95
							3.1.2	Consultation, roles & responsibilities	0.25	0.125	100
							3.1.3	Long term objectives	0.25	0.125	100
		3.1.4	Incentives for sustainable fishing				0.25	0.125	100		
		Fishery specific management system	0.5			3.2.1	Fishery specific objectives	0.2	0.1	100	
						3.2.2	Decision making processes	0.2	0.1	90	
						3.2.3	Compliance & enforcement	0.2	0.1	90	
						3.2.4	Research plan	0.2	0.1	90	
						3.2.5	Management performance evaluation	0.2	0.1	80	

6.3 Summary of Conditions

Table 11: Summary of Conditions

Condition number	Condition	Performance Indicator
1	By the end of the fourth year of certification, the SG 80 scoring requirements above must be met in full. This will be achieved if the limit reference point is set above the level at which there is an appreciable risk of impairing reproductive capacity, and if the target reference point is such that the stock is maintained at a level consistent with B_{MSY} or some measure or surrogate with similar intent or outcome.	1.1.2
2	By the end of the fourth year of certification, the SG 80 scoring requirements above must be met in full. This will be achieved if well defined harvest control rules are in place that are consistent with the harvest strategy and ensure that the exploitation rate is reduced as limit reference points are approached, the selection of the harvest control rules takes into account the main uncertainties, and available evidence indicates that the tools in use are appropriate and effective in achieving the exploitation levels required under the harvest control rules.	1.2.2

It is noted that the MSC requires that assessment outcomes (i.e., evaluation, scoring and conditions) are harmonised between overlapping fisheries so that consistent conclusions are achieved (MSC CR CI 3.2.3.2c). The overlapping fisheries are the WFOA and CHMSF North Pacific albacore troll/jig fisheries, and the New Zealand albacore troll fishery. The assessment team contends that the AAFA outcomes are consistent with the Conditions placed on the New Zealand fishery (i.e., reference points and a harvest control rule must be adopted in order for the Conditions to be closed out). However, on timelines, the New Zealand fishery was certified in May 2011, and their conditions are scheduled to be closed in 2015 (i.e. in less than 3 years time). It is considered that the AAFA fishery justifies a full four years to meet their Conditions because of the need to engage two RFMOs (WCPFC and IATTC) rather than the single RFMO (WCPFC) that the New Zealand fishery must engage. On this basis, the AAFA assessment team accepts a four year timeline to close the two Conditions. It may also be noted that the single Condition on the WFOA and CHMSF fisheries was introduced before guidance requiring that Conditions are time-bound and outcome focused was provided. As such, the Condition on those fisheries is not considered valuable for harmonization purposes.

6.3.1 Non-Binding Recommendation

- 1) It is noted that seabird protection measures are specified for longline vessels fishing under the US West Coast HMS FMP as amended (PFMC 2007b). However, these do not apply to the pole and troll albacore fleet, which can be taken as a reflection of the very low risk that is deemed to be posed by these gear types to seabird species. However, it would be good practice for AAFA members to be provided with and to follow the guidance for seabird handling, as required by longline vessels, in the very rare event that a seabird was taken aboard an AAFA vessel.

6.4 Determination, Formal Conclusion and Agreement

At the Final Determination Report stage, the assessment team considers that the AAFA North Pacific albacore pole and troll fishery should be recertified. This is confirmed and agreed by Intertek Moody Marine's Independent Board. It is therefore determined that the AAFA North Pacific albacore pole and troll fishery be recertified according to the Marine Stewardship Council's Principles and Criteria for Sustainable Fisheries.

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Appendices

Appendix 1: Performance Indicator Scores and Rationales

Evaluation Table PI 1.1.1

PI 1.1.1		The stock is at a level which maintains high productivity and has a low probability of recruitment overfishing																																		
SG	Issue	Met? (Y/N)	Justification/Rationale																																	
60	a	Y	It is likely that the stock is above the point where recruitment would be impaired.																																	
			The fishery exceeds this level of performance.																																	
80	a	Y	It is highly likely that the stock is above the point where recruitment would be impaired.																																	
			The fishery meets this scoring issue at the SG100 level.																																	
	b	Y	The stock is at or fluctuating around its target reference point.																																	
			The fishery meets this scoring issue at the SG100 level.																																	
100	a	Y	There is a high degree of certainty that the stock is above the point where recruitment would be impaired.																																	
			<p>The current assessment concluded the North Pacific albacore stock is considered to be healthy at current levels of recruitment and fishing mortality. Since current F₂₀₀₆₋₂₀₀₈ is about 71% of F_{SSB-ATHL} and the stock is expected to fluctuate around the long-term median SSB (~405,000 t) in the foreseeable future given average historical recruitment levels and constant fishing mortality at F₂₀₀₆₋₂₀₀₈, the conclusion is that overfishing is not occurring and that the stock likely is not in an overfished condition. Ref: WCPFC report. However a reference point has not been formally adopted by the management body. Table 1 shows stock performance relative to most used potential reference points.</p> <p>Table 1: Potential reference points and estimated F-ratio using F_{current} (F₂₀₀₆₋₂₀₀₈), associated spawning biomass and equilibrium yield. F_{SSBL-ATHL} is not equilibrium concept so SSB and yield are given as median levels. (WCPFC-NC7_2011/IP-02).</p> <table border="1" data-bbox="557 1559 1394 1957"> <thead> <tr> <th>Reference Point</th> <th>F₂₀₀₆₋₂₀₀₈/F_{RP}</th> <th>SSB (t)</th> <th>Equilibrium Yield (t)</th> </tr> </thead> <tbody> <tr> <td>F_{SSB-ATHL}</td> <td>0.71</td> <td>346,382</td> <td>101,426</td> </tr> <tr> <td>F_{MAX}</td> <td>0.14</td> <td>11,186</td> <td>185,913</td> </tr> <tr> <td>F_{0.1}</td> <td>0.29</td> <td>107,130</td> <td>170,334</td> </tr> <tr> <td>F_{MED}</td> <td>0.99</td> <td>452,897</td> <td>94,080</td> </tr> <tr> <td>F_{20%}</td> <td>0.38</td> <td>171,427</td> <td>156,922</td> </tr> <tr> <td>F_{30%}</td> <td>0.52</td> <td>257,140</td> <td>138,248</td> </tr> <tr> <td>F_{40%}</td> <td>0.68</td> <td>342,854</td> <td>119,094</td> </tr> <tr> <td>F_{50%}</td> <td>0.91</td> <td>428,567</td> <td>99,643</td> </tr> </tbody> </table> <p>Stochastic future projections of the stock were conducted to estimate the</p>	Reference Point	F ₂₀₀₆₋₂₀₀₈ /F _{RP}	SSB (t)	Equilibrium Yield (t)	F _{SSB-ATHL}	0.71	346,382	101,426	F _{MAX}	0.14	11,186	185,913	F _{0.1}	0.29	107,130	170,334	F _{MED}	0.99	452,897	94,080	F _{20%}	0.38	171,427	156,922	F _{30%}	0.52	257,140	138,248	F _{40%}	0.68	342,854	119,094	F _{50%}
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<p>PI 1.1.1</p>	<p>The stock is at a level which maintains high productivity and has a low probability of recruitment overfishing</p>	
		<p>probability that future SSB will fall below the average of the ten historically lowest estimated SSBs (SSB-ATHL) in at least one year of a 25-yr (2010-2035) projection period. The SS3 base-case model estimates that SSB has likely fluctuated between 300,000 and 500,000 t between 1966 and 2009 and that recruitment has averaged 48 million fish annually during this period. The pattern of F-at-age shows fishing mortality increasing to its highest level on 3-yr old fish and then declining to a much lower and stable level in mature fish. Current F (geometric mean of 2006 to 2008, F2006-2008) is lower than F2002-2004 (current F in the 2006 assessment). Future SSB is expected to fluctuate around the historical median SSB (~405,000 t) assuming F remains constant at F2006-2008 and average historical recruitment levels persist. F2006-2008 is approximately 30% below FSSB-ATHL 50% and there is about a 1% risk that future SSB will fall below the SSB-ATHL threshold in at least one year in the 25 year projection period,</p>
	<p>b</p>	<p>There is a high degree of certainty that the stock has been fluctuating around its target reference point, or has been above its target reference point, over recent years.</p> <div data-bbox="478 952 1380 1825" data-label="Figure"> </div> <p>The North Pacific albacore stock is considered to be healthy at current levels of recruitment and fishing mortality. Since current F2006-2008 is about 71% of FSSB-ATHL and the stock is expected to fluctuate around the long-term median SSB (~405,000 t) in the foreseeable future given average historical recruitment levels and constant fishing mortality at F2006-2008, the WG concluded that overfishing is not occurring and that the stock likely is not in an overfished</p>

PI 1.1.1	The stock is at a level which maintains high productivity and has a low probability of recruitment overfishing		
		<p>condition. Since the mid-1960's the SSB has remained in the 300,000 mt to 500,000 t range contributing to a high degree of certainty regarding the low probability of recruitment overfishing. Recruitment remains high and stable further contributing to low likelihood of recruitment overfishing as noted in 100 a, above, although under some risk analysis scenarios there is the potential for the stock to reach the SSB-ATHL limit threshold (which is a conservative and precautionary management goal).</p> <p>The estimated total stock biomass over time is shown above. Calculated biomass has remained at high levels for the entire time period with recent levels from the mid 1990's of 800,000 t or greater.</p>	
References	WCPFC 2010, WCPFC 2011b.		
Stock Status relative to Reference Points			
	Type of reference point	Value of reference point	Current stock status relative to reference point
Target reference point	$F_{CURRENT}$ Average minimum spawning biomass for the lowest 10 years in the time history, SSB-ATHL	The $F_{CURRENT}$ reference point is the value of the ratio using $F_{current}$ ($F_{2006-2008}$) to the F calculated for the average of the ten historically lowest estimated SSBs (SSB-ATHL) = $F_{CURRENT}/F_{SSB-ATHL}$	The current value of $F_{CURRENT}$ is 0.71; the current $F_{2006-2008}$ is about 71% of $F_{SSB-ATHL}$ and the stock is expected to fluctuate around the long-term median SSB (~405,000 t) in the foreseeable future given average historical recruitment levels and constant fishing mortality at $F_{2006-2008}$ (current level).
Limit reference point	F_{LIMIT} Average minimum spawning biomass for the lowest 10 years in the time history, SSB-ATHL	The implied limit reference point is the lowest SSB in mt calculated as the average of the ten historically lowest estimated SSBs in the time series used (mid-1960's to the present) SSB-ATHL.	Since the mid-1960's the SSB has remained in the 300,000 mt to 500,000 t range (long term median +405,000mt) contributing to a high degree of certainty regarding the low probability of recruitment overfishing. $F_{2006-2008}$ is approximately 30% below $F_{SSB-ATHL}$ 50% and there is about a 1% risk that future SSB will fall below the SSB-ATHL threshold in at least one year in the 25 year projection period.
OVERALL PERFORMANCE INDICATOR SCORE:			100
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 1.1.2

PI 1.1.2		Limit and target reference points are appropriate for the stock																																		
SG	Issue	Met? (Y/N)	Justification/Rationale																																	
60	a	Y	Generic limit and target reference points are based on justifiable and reasonable practice appropriate for the species category.																																	
			The fishery meets this scoring issue at the SG80 level.																																	
80	a	Y	Reference points are appropriate for the stock and can be estimated.																																	
			<p>The F-based reference point $F_{SSB-ATHL}$ is one of a group of simulation-based biological reference points (BRP) using spawning biomass thresholds proposed for North Pacific albacore. Unlike other BRPs used in fisheries management, FSSB is not an equilibrium concept and therefore does not assume that future SSB or yield will remain constant at some specified level. As a simulation-based BRP, $F_{SSB-ATHL}$ can incorporate non-equilibrium dynamics, uncertainty in the stock size estimates, and other parameters from the assessment as well as uncertainty in recruitment in future years.</p> <p>Estimates of $F_{2006-2008}$ (current F) relative to several F-based reference points used in contemporary fisheries management are presented below in Table 1. The estimates are expressed as the ratio of $F_{2006-2008}/F_{ref\ point}$, which means that when the ratio is less than 1.0, $F_{2006-2008}$ is below the reference point estimate. The F_{MAX}, F_{MED} and $F_{0.1}$ reference points are based on yield-per-recruit analysis while the $F_{20-50\%}$ reference points are spawning biomass-based proxies of F_{MSY}. Since $F_{2006-2008}$ is close to F_{MED} and well below the MSY proxy rates, the assessment infers that overfishing of the North Pacific albacore stock is unlikely at present. Therefore, the current fishing mortality is less than, and in some cases much less than, commonly applied F-based reference points.</p> <p>Table 1: Potential reference points and estimated F-ratio using $F_{current}$ ($F_{2006-2008}$), associated spawning biomass and equilibrium yield. $F_{SSB-ATHL}$ is not equilibrium concept so SSB and yield are given as median levels.</p> <table border="1" data-bbox="557 1346 1353 1744"> <thead> <tr> <th>Reference Point</th> <th>$F_{2006-2008}/F_{RP}$</th> <th>SSB (t)</th> <th>Equilibrium Yield (t)</th> </tr> </thead> <tbody> <tr> <td>$F_{SSB-ATHL}$</td> <td>0.71</td> <td>346,382</td> <td>101,426</td> </tr> <tr> <td>F_{MAX}</td> <td>0.14</td> <td>11,186</td> <td>185,913</td> </tr> <tr> <td>$F_{0.1}$</td> <td>0.29</td> <td>107,130</td> <td>170,334</td> </tr> <tr> <td>F_{MED}</td> <td>0.99</td> <td>452,897</td> <td>94,080</td> </tr> <tr> <td>$F_{20\%}$</td> <td>0.38</td> <td>171,427</td> <td>156,922</td> </tr> <tr> <td>$F_{30\%}$</td> <td>0.52</td> <td>257,140</td> <td>138,248</td> </tr> <tr> <td>$F_{40\%}$</td> <td>0.68</td> <td>342,854</td> <td>119,094</td> </tr> <tr> <td>$F_{50\%}$</td> <td>0.91</td> <td>428,567</td> <td>99,643</td> </tr> </tbody> </table>	Reference Point	$F_{2006-2008}/F_{RP}$	SSB (t)	Equilibrium Yield (t)	$F_{SSB-ATHL}$	0.71	346,382	101,426	F_{MAX}	0.14	11,186	185,913	$F_{0.1}$	0.29	107,130	170,334	F_{MED}	0.99	452,897	94,080	$F_{20\%}$	0.38	171,427	156,922	$F_{30\%}$	0.52	257,140	138,248	$F_{40\%}$	0.68	342,854	119,094	$F_{50\%}$
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80	b	N	The limit reference point is set above the level at which there is an appreciable risk of impairing reproductive capacity.																																	
			The fishery is under an implicit limit reference point. The implicit limit reference point SSB-ATHL has been considered in the formulation of the WCPFC's current stock management limiting fishing effort (beginning in 2005). The limit reference point provides for a minimum spawning stock biomass needed to maintain MSY and is calculated as a precautionary limit. However, as it is only implicit, the fishery does not meet this level of performance.																																	

PI 1.1.2		Limit and target reference points are appropriate for the stock	
SG	Issue	Met? (Y/N)	Justification/Rationale
	c	N	<p>The target reference point is such that the stock is maintained at a level consistent with B_{MSY} or some measure or surrogate with similar intent or outcome.</p> <p>The $F_{CURRENT}$ reference point is the value of the ratio using $F_{current}$ ($F_{2006-2008}$) to the F calculated for the average of the ten historically lowest estimated SSBs ($SSB-ATHL$) = $F_{CURRENT}/F_{SSB-ATHL}$. The current value of $F_{CURRENT}$ is 0.71, meaning that current $F_{2006-2008}$ is about 71% of $F_{SSB-ATHL}$, such that the stock is expected to fluctuate around the long-term median SSB (~405,000 t) in the foreseeable future given average historical recruitment levels and fishing mortality at the current level. However, as this is only an implicit target, the fishery does not meet this level of performance.</p>
	d	N/A	<p>Key low trophic level species, the target reference point takes into account the ecological role of the stock.</p> <p>Albacore tuna is not a low trophic level species and so this scoring issue has not been scored.</p>
100	b	N	<p>The limit reference point is set above the level at which there is an appreciable risk of impairing reproductive capacity following consideration of precautionary issues.</p> <p>The limit reference point is only implicit and so the fishery does not meet this scoring issue.</p>
	c	N	<p>The target reference point is such that the stock is maintained at a level consistent with B_{MSY} or some measure or surrogate with similar intent or outcome, or a higher level, and takes into account relevant precautionary issues such as the ecological role of the stock with a high degree of certainty.</p> <p>The target reference point is implicit and the fishery does not meet this level of performance.</p>
References		WCPFC 2005, WCPFC 2010, WCPFC 2011b.	
OVERALL PERFORMANCE INDICATOR SCORE:			70
CONDITION NUMBER (if relevant):			1

Evaluation Table: PI 1.1.3

PI 1.1.3		Where the stock is depleted, there is evidence of stock rebuilding	
SG	Issue	Met? (Y/N)	Justification/Rationale
60	a	N/A	Where stocks are depleted rebuilding strategies which have a reasonable expectation of success are in place. The stock is not considered to be depleted, and so this performance indicator is not scored.
	b		A rebuilding timeframe is specified for the depleted stock that is the shorter of 30 years or 3 times its generation time. For cases where 3 generations is less than 5 years, the rebuilding timeframe is up to 5 years.
	c		Monitoring is in place to determine whether they are effective in rebuilding the stock within a specified timeframe.
80	a		Where stocks are depleted rebuilding strategies are in place.
	b		A rebuilding timeframe is specified for the depleted stock that is the shorter of 20 years or 2 times its generation time . For cases where 2 generations is less than 5 years, the rebuilding timeframe is up to 5 years.
	c		There is evidence that they are rebuilding stocks, or it is highly likely based on simulation modelling or previous performance that they will be able to rebuild the stock within a specified timeframe.
100	a		Where stocks are depleted, strategies are demonstrated to be rebuilding stocks continuously and there is strong evidence that rebuilding will be complete within the specified timeframe .
	b		The shortest practicable rebuilding timeframe is specified which does not exceed one generation time for the depleted stock.
References			
OVERALL PERFORMANCE INDICATOR SCORE:			N/A
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 1.2.1

PI 1.2.1		There is a robust and precautionary harvest strategy in place	
SG	Issue	Met? (Y/N)	Justification/Rationale
60	a	Y	The harvest strategy is expected to achieve stock management objectives reflected in the target and limit reference points.
			Both the IATTC and the WCPFC have adopted management measures for this stock (IATTC resolution C-05-02; WCPFC Conservation and Management Measure (CMM) 2005-03). The fishery meets this scoring issue at the SG80 level.
	b	Y	The harvest strategy is likely to work based on prior experience or plausible argument.
			Effort limitations have been used successfully by the IATTC (yellowfin and bigeye tunas) and other fisheries to control fishing mortality and to maintain stocks at sustainable levels. In this fishery, there is good evidence since the measures were introduced that effort levels have been maintained and that the stock has not been overfished as a result. The fishery meets this scoring issue at the SG80 level.
	c	Y	Monitoring is in place that is expected to determine whether the harvest strategy is working.
			Annual data compilations and assessments are reviewed by both the IATTC and WCPFC. Data monitoring requirements are in place for all WCPFC members. For the US fishery, the PFMC maintains comprehensive landings data (PacFIN). US vessels fishing for albacore must comply with Federal logbook reporting requirements.
80	a	Y	The harvest strategy is responsive to the state of the stock and the elements of the harvest strategy work together towards achieving management objectives reflected in the target and limit reference points.
			IATTC resolution C-05-02 adopted in 2005 remains in effect, namely that: the IATTC has resolved to limit fishing effort from increasing and to work with the WCPFC to the same end, specifically: <ol style="list-style-type: none"> The total level of fishing effort for North Pacific albacore tuna in the Eastern Pacific Ocean not be increased beyond current levels. At the 2008 IATTC meeting it was recommended that the fishing mortality averaged for 2002-2004 be used as the “current” fishing mortality as applies to (1). The CPCs [IATTC parties, cooperating non-party, fishing entity or regional economic integration organization] shall take necessary measures to ensure that the level of fishing effort by their vessels fishing for North Pacific albacore tuna is not increased; All CPCs shall report all catches of North Pacific albacore tuna by gear type to the IATTC every six months. However, since the limit in the resolution is in terms of effort, the six-monthly reports include information on effort as well as catch, in terms of the most relevant measures for a given gear type. The technical aspects of the effort data to be supplied could be established by the IATTC in collaboration with scientists of the interested member countries. <p>Similarly, the WCPFC Conservation and Management Measure (CMM) 2005-03, which is very similar to IATTC C-05-02 also remains in effect. The stock status (overfishing is not occurring and the stock is not overfished) indicates that this has proved effective in achieving the objectives reflected in the reference points.</p>
	b	Y	The harvest strategy may not have been fully tested but monitoring is in place and evidence exists that it is achieving its objectives.

PI 1.2.1		There is a robust and precautionary harvest strategy in place	
SG	Issue	Met? (Y/N)	Justification/Rationale
			The performance of the harvest strategy is evaluated through the stock assessment process. The models available and information are sufficient to fully evaluate the strategy and the assessors should continue to evaluate the performance, which has not been questioned after several years. The fishery meets this level of performance.
100	a	N	<p>The harvest strategy is responsive to the state of the stock and is designed to achieve stock management objectives reflected in the target and limit reference points.</p> <p>Target and limit reference points have not been formally adopted, and so it cannot be said that the harvest strategy is designed to achieve stock management objectives reflected in the target and limit reference points. As such, the fishery cannot meet this level of performance.</p>
	b	N	<p>The performance of the harvest strategy has been fully evaluated and evidence exists to show that it is achieving its objectives including being clearly able to maintain stocks at target levels.</p> <p>The performance of the harvest strategy has not been fully evaluated, and so the fishery does not meet this level of performance.</p>
	d	Y	<p>The harvest strategy is periodically reviewed and improved as necessary.</p> <p>U.S. law requires the PFMC to annually review its FMP and performance under National Standard 1 and address any issues arising. Both the WCPFC and IATTC annually review management resolutions prior to extending same for additional time.</p>
	References		IATTC 2005, WCPFC 2005.
OVERALL PERFORMANCE INDICATOR SCORE:			85
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 1.2.2

PI 1.2.2		There are well defined and effective harvest control rules in place	
SG	Issue	Met? (Y/N)	Justification/Rationale
60	a	Y	<p>Generally understood harvest rules are in place that are consistent with the harvest strategy and which act to reduce the exploitation rate as limit reference points are approached.</p> <p>The harvest control rule is generally understood as reducing harvest when the stock approaches or falls below the MSY point. However, the precise point when action will be taken and exactly what action will be taken is not defined, but would be proposed by the Commission based on the advice of the Scientific Committee at the time. This would likely be similar to the advice currently given, which is based around controlling fishing effort and capacity. An example of this approach is provided for big-eye tuna which is more heavily exploited.</p> <p>The scientific basis for decision making is well established and documented. The harvest control rules are currently based on B/BMSY and F/FMSY benchmarks.. The overarching harvest control rule to maintain stocks at or above MSY has been established and codified by the Commissions. Thus, this harvest control rule is generally consistent with reference points from the assessment and the limitations of data that are inputs to the assessment.</p>
	c	Y	<p>There is some evidence that tools used to implement harvest control rules are appropriate and effective in controlling exploitation.</p> <p>Tools, should they be needed, can be initiated through the IATTC and WCPFC. Currently, measures are in place in the Commissions to prevent increases of fishing effort on albacore. This is exemplified by the Conservation and Management Measure WCPFC-CMM-03 which went into place on Feb 16, 2006. Comparable actions have been taken by IATTC and WCPFC for other species (such as yellowfin and bigeye tunas), and evidence exists that some control is being exerted over the exploitation of these stocks. Catches in 2007 and 2008 were below the 2005 levels.</p>
80	a	N	<p>Well defined harvest control rules are in place that are consistent with the harvest strategy and ensure that the exploitation rate is reduced as limit reference points are approached.</p> <p>The harvest control is consistent with the aims of the harvest strategy standard and indicates that the exploitation rate will be reduced once the stock approaches B_{MSY}. However, the lack of a well-defined harvest control rule prevents assessment of how precautionary it is or whether current tools are adequate in applying the rule, so the performance indicator is unable to meet the 80 guidepost requirements.</p>
	b	N	<p>The selection of the harvest control rules takes into account the main uncertainties.</p> <p>No harvest control rules have been formally adopted, and so the fishery cannot meet this level of performance.</p>
	c	N	<p>Available evidence indicates that the tools in use are appropriate and effective in achieving the exploitation levels required under the harvest control rules.</p> <p>No harvest control rules have been formally adopted, and so the fishery cannot meet this level of performance.</p>
100	a	N	<p>Well defined harvest control rules are in place that are consistent with the harvest strategy and ensure that the exploitation rate is reduced as limit reference points are approached.</p> <p>The fishery does not meet this level of performance.</p>

PI 1.2.2		There are well defined and effective harvest control rules in place	
SG	Issue	Met? (Y/N)	Justification/Rationale
	b	N	The design of the harvest control rules takes into account a wide range of uncertainties. The fishery does not meet this level of performance.
	c	N	Evidence clearly shows that the tools in use are effective in achieving the exploitation levels required under the harvest control rules. The fishery does not meet this level of performance.
References		Campbell 2009, IATTC 2005, Preece <i>et al.</i> 2009, WCPFC 2005, WCPFC 2008a, WCPFC 2008b, WCPFC 2011b.	
OVERALL PERFORMANCE INDICATOR SCORE:			60
CONDITION NUMBER (if relevant):			2

Evaluation Table: PI 1.2.3

PI 1.2.3		Relevant information is collected to support the harvest strategy	
SG	Issue	Met? (Y/N)	Justification/Rationale
60	a	Y	Some relevant information related to stock structure, stock productivity and fleet composition is available to support the harvest strategy.
			The fishery meets this scoring issue at the SG100 level.
	b	Y	Stock abundance and fishery removals are monitored and at least one indicator is available and monitored with sufficient frequency to support the harvest control rule.
			The fishery meets this scoring issue at the SG100 level.
80	a	Y	Sufficient relevant information related to stock structure, stock productivity, fleet composition and other data is available to support the harvest strategy.
			The fishery meets this scoring issue at the SG100 level.
	b	Y	Stock abundance and fishery removals are regularly monitored at a level of accuracy and coverage consistent with the harvest control rule , and one or more indicators are available and monitored with sufficient frequency to support the harvest control rule.
			The fishery meets this scoring issue at the SG100 level.
	c	Y	There is good information on all other fishery removals from the stock.
			Other non-commercial fishery removals such as sport fishing are documented and included in PFMC statistics reported annually to WCPFC. Non-commercial removals are considered very small.
100	a	Y	A comprehensive range of information (on stock structure, stock productivity, fleet composition, stock abundance, fishery removals and other information such as environmental information), including some that may not be directly related to the current harvest strategy, is available.
			The life history of albacore is understood, is very well documented and all life stages are identifiable.
			The species is highly migratory, making trans-oceanic migrations. North and South Pacific stocks are accepted as separate, distinct populations. Complete geographical range of the stocks, including ontogenic and seasonal patterns of migrations, is understood and verified by conventional and archival tagging studies. Seasonal variability in migrations are reasonably well described in the North Pacific. Reliable estimates are available on fecundity, growth rates, and length and weight at age, estimated by analysing hard parts, evaluations of size distributions of the landed catch, and tag-recapture studies. Fishery catches are reported annually, and size composition of landings, monitored since early 1960's, is used to detect and monitor spatial and temporal shifts and trends in age composition of catches.
			Although differential growth by sex has not been addressed in peer reviewed literature to the assessment team's knowledge, these data are not required for the stock assessment model used in the North Pacific. Nevertheless, the assessment will be further strengthened when and if such information becomes available.
	b	Y	All information required by the harvest control rule is monitored with high frequency and a high degree of certainty, and there is a good understanding of inherent uncertainties in the information [data] and the robustness of assessment

PI 1.2.3		Relevant information is collected to support the harvest strategy	
SG	Issue	Met? (Y/N)	Justification/Rationale
			<p>and management to this uncertainty.</p> <p>Continuous logbook records for the US fishery since 1961 provide fishery dependent CPUE indices for estimating and monitoring the relative abundance composition of the stock. Fishery dependent information from the US fishery, as well as from foreign fisheries harvesting North Pacific albacore have been used at North Pacific Albacore Workshops, held usually bi-annually since 1974, to monitor and evaluate trends in North Pacific albacore stock status.</p> <p>Conventional tagging studies have been carried out in the North Pacific. Tagging results are not directly incorporated in assessment at present because recoveries are limited and not well distributed in space and time.</p> <p>Considerable evaluation of the robustness and appropriateness of the information providing trends in abundance (CPUEs) have been conducted in the context of the stock assessment. These uncertainties were examined through the statistical standardization of the CPUEs and through exploration of alternative model formulations. While uncertainties still remain in some of the data sets, the indices are considered useful for elucidating resource trends. The impact of those uncertainties is considered when the overall scientific advice is formulated. Thus, indices are considered reliable and indicative of stock status</p> <p>Although there is no harvest control rule (HCR) formally in place for the North Pacific albacore fishery, information collected would be adequate to support formal HCRs if they were introduced, and so the fishery meets this level of performance.</p>
References		PFMC 2011b, WCPFC 2011b.	
OVERALL PERFORMANCE INDICATOR SCORE:			100
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 1.2.4

PI 1.2.4		There is an adequate assessment of the stock status	
SG	Issue	Met? (Y/N)	Justification/Rationale
60	b	Y	<p>The assessment estimates stock status relative to reference points.</p> <p>Annual assessments are conducted by the Albacore Working Group (ALBWG) of the WCPFC. Although explicit reference points have not been established for this stock, the assessment has considered stock status in comparison to a variety of potential reference points, including the implicit management target of $B_{SSB-ATHL}$.</p>
	c	Y	<p>The assessment identifies major sources of uncertainty.</p> <p>The fishery meets this level of performance at the SG100 level.</p>
80	a	Y	<p>The assessment is appropriate for the stock and for the harvest control rule.</p> <p>The fishery meets this level of performance at the SG100 level.</p>
	c	Y	<p>The assessment takes uncertainty into account.</p> <p>Analyses were carried out to assess the sensitivity of the results to assumptions including data-weighting (both between data types and relative weightings of different sources within a data type), biology (stock-recruitment relationship, natural mortality, growth), and fishery selectivity patterns. The fishery exceeds this level of performance.</p>
	e	Y	<p>The assessment of stock status is subject to peer review.</p> <p>The assessment results are internally reviewed by the Albacore Working Group (ALBWG). The results are then presented and reviewed by the WCPFC Scientific Committee, so meeting this scoring issue.</p>
100	a	Y	<p>The assessment is appropriate for the stock and for the harvest control rule and takes into account the major features relevant to the biology of the species and the nature of the fishery.</p> <p>The current assessment of the status and future trends in the north Pacific albacore tuna (<i>Thunnus alalunga</i>) stock was completed in June 2011 using fishery data through 2009. This assessment was conducted using the Stock Synthesis modeling platform (Version 3.11b) and is based on the assumption that there is a single well-mixed stock of albacore in the north Pacific Ocean. Analyses were carried out to assess the sensitivity of the results to assumptions including data-weighting (both between data types and relative weightings of different sources within a data type), biology (stock-recruitment relationship, natural mortality, growth), and fishery selectivity patterns. Stochastic future projections of the stock were conducted to estimate the probability that future SSB will fall below the average of the ten historically lowest estimated SSBs (SSB_{ATHL}) in at least one year of a 25-yr (2010-2035) projection period. It is considered that the assessment is appropriate for the stock, takes into account the major features of the species and, although there is only an implicit harvest control rule in place, would be appropriate for managing with the fishery against a harvest control rule if one was introduced.</p>
	c	Y	<p>The assessment takes into account uncertainty and is evaluating stock status relative to reference points in a probabilistic way.</p> <p>The Albacore Working Group (ALBWG) developed a seasonal, length-based, age-structured, forward-simulation population model with a focus on providing reliable estimates of population dynamics and stock abundance. Analyses were carried out to assess the sensitivity of the results to assumptions including data-weighting (both between data types and relative weightings of different sources within a data type),</p>

PI 1.2.4		There is an adequate assessment of the stock status	
SG	Issue	Met? (Y/N)	Justification/Rationale
			biology (stock-recruitment relationship, natural mortality, growth), and fishery selectivity patterns. Stochastic future projections of the stock were conducted.
	d	Y	The assessment has been tested and shown to be robust. Alternative hypotheses and assessment approaches have been rigorously explored. Sensitivity and retrospective analyses assessed the impact of alternative assumptions on the assessment results. These analyses revealed scaling differences in estimated biomass (total and SSB) and, to a lesser extent, recruitment, but few differences in overall trends. Relative F-at-age patterns were not affected by different assumptions, except when the growth curve parameters from the 2006 assessment were used, and F2006-2008 was consistently lower than F2002-2004. Although there is considerable uncertainty in absolute estimates of biomass and fishing mortality, the estimated trends in both quantities are robust and advice-based on FSSB is not affected by this uncertainty.
	e	N	The assessment has been internally and externally peer reviewed. The assessment results are internally reviewed by the Albacore Working Group (ALBWG). The results are then presented and reviewed by the WCPFC Scientific Committee, but this can still only be considered an internal review.
References		PFMC 2011b, WCPFC 2011b.	
OVERALL PERFORMANCE INDICATOR SCORE:			95
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 2.1.1

PI 2.1.1		The fishery does not pose a risk of serious or irreversible harm to the retained species and does not hinder recovery of depleted retained species	
SG	Issue	Met? (Y/N)	Justification/Rationale
60	a	Y	<p>Main retained species are likely to be within biologically based limits (if not, go to scoring issue d below).</p> <p>As the catch of no retained species exceeds 5% of the total albacore landings, it is considered that there are no main retained species in AAFA's North Pacific albacore fishery.</p>
	c	Y	<p>If main retained species are outside the limits there are measures in place that are expected to ensure that the fishery does not hinder recovery and rebuilding of the depleted species.</p> <p>There are no main retained species in the fishery.</p>
	d	Y	<p>If the status is poorly known there are measures or practices in place that are expected to result in the fishery not causing the retained species to be outside biologically based limits or hindering recovery.</p> <p>There are no main retained species in the fishery.</p>
80	a	Y	<p>Main retained species are highly likely to be within biologically based limits (if not, go to scoring issue c below).</p> <p>There are no main retained species in the fishery.</p>
	c	Y	<p>If main retained species are outside the limits there is a partial strategy of demonstrably effective management measures in place such that the fishery does not hinder recovery and rebuilding.</p> <p>There are no main retained species in the fishery.</p>
100	a	Y	<p>There is a high degree of certainty that retained species are within biologically based limits and fluctuating around their target reference points.</p> <p>Northern anchovy, a forage fish species used as a bait/chum for albacore, is considered in this assessment under the retained species performance indicators. There are no official statistics available on the total quantities of northern anchovy used by the AAFA fleet but, based on the estimates of bait usage provided by experienced AAFA fishermen, it is thought that approximately 150 t of northern anchovy is used annually. As approximately 5,000 t – 6,000 t of albacore is landed annually by the AAFA fleet, the 150 t of northern anchovy equates to 2.5% - 3% of the total albacore catch by weight.</p> <p>Northern anchovy are a monitored species, so catch records are maintained. The total catch of northern anchovy in the 2000s in California, Oregon and Washington has ranged between 1,676 and 19,277 t. The estimated usage by the AAFA fleet therefore represents a small percentage of the total catch. Overfishing limits (OFLs) as MSY proxies were established in 2010, and while the last full assessment of the stock was in 1995, it is considered that the fishing pressure is limited and the stocks are not overfished or experiencing overfishing (PFMC 2010).</p> <p>In the last 10 years, on average, no retained highly migratory species (HMS) fish species or species group landed while targeting albacore has made up more than 0.03% of the total albacore catch by weight; such catches are therefore considered to be rare events and negligible in their impact. As such, an understanding of the stock status of those species with respect to biological reference points is not considered to be required for this assessment (MSC 2012).</p>
	b	Y	<p>Target reference points are defined for retained species.</p>

PI 2.1.1		The fishery does not pose a risk of serious or irreversible harm to the retained species and does not hinder recovery of depleted retained species	
SG	Issue	Met? (Y/N)	Justification/Rationale
			<p>The PFMC adopted new management benchmarks for the northern and central subpopulations of northern anchovy in 2010 (PFMC 2011c). Catches have varied widely over time, but the overfishing limits (OFLs) are based on past estimates of biomass and are considered an MSY proxy, while the acceptable biological catch values account for a 75 % uncertainty buffer in the OFL. The annual catch limit was set at 1500 t for the northern subpopulation.</p> <p>As only negligible quantities of other HMS fish species are taken while targeting albacore, this scoring guidepost can be met without knowing the status of those species with respect to biological reference points (MSC 2012). Nevertheless, the stocks of bluefin, bigeye, skipjack and yellowfin tuna, that together make up the largest bycatch group (tunas), as well as for swordfish, shortfin mako and blue shark, are assessed at least periodically, and reference points have been described if not necessarily adopted by managers in all cases (PFMC 2011b).</p>
		References	MSC 2012, PFMC 2010, PFMC 2011b, PFMC 2011c, PFMC 2012.
OVERALL PERFORMANCE INDICATOR SCORE:			100
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 2.1.2

PI 2.1.2		There is a strategy in place for managing retained species that is designed to ensure the fishery does not pose a risk of serious or irreversible harm to retained species	
SG	Issue	Met? (Y/N)	Justification/Rationale
60	a	Y	There are measures in place, if necessary, that are expected to maintain the main retained species at levels which are highly likely to be within biologically based limits, or to ensure the fishery does not hinder their recovery and rebuilding.
			As the catch of no retained species exceeds 5% of the total albacore landings, it is considered that there are no main retained species in AAFA's North Pacific albacore fishery.
	b	Y	The measures are considered likely to work, based on plausible argument (e.g., general experience, theory or comparison with similar fisheries/species).
			There are no main retained species in the fishery.
80	a	Y	There is a partial strategy in place, if necessary that is expected to maintain the main retained species at levels which are highly likely to be within biologically based limits, or to ensure the fishery does not hinder their recovery and rebuilding.
			There are no main retained species in the fishery.
	b	Y	There is some objective basis for confidence that the partial strategy will work, based on some information directly about the fishery and/or species involved.
			There are no main retained species in the fishery.
	c	Y	There is some evidence that the partial strategy is being implemented successfully .
			There are no main retained species in the fishery.
100	a	Y	There is a strategy in place for managing retained species.
			The northern anchovy that are used as bait are deliberately targeted for use in the AAFA North Pacific albacore fishery. Northern anchovy is managed by the PFMC as a 'monitored' species, meaning landings are monitored, OFLs (MSY proxies) are established, and the number and capacity of vessels in the fishery is limited. Any changes in management are based on significant changes in the landings or the fishery (PFMC 2011e). The measures as laid out in the CPS Fishery Management plan are considered to constitute a strategy to manage this species.
	b	Y	The pole and troll method of fishing ensures that the capture of species other than albacore is a rare event and poses no risk to those species. This is demonstrated through the negligible quantities of other species taken in the fishery, with a maximum average of 0.03 % of the weight of the albacore catch being recorded for any species or species group in the last 10 years. Over the last 30 years, the maximum catch of any retained species in any single year was for swordfish in 1993, when it amounted to 1.55 % of the albacore catch. The gear is clearly designed for and is successful at catching albacore rather than other species and, together with the Magnuson-Stevens Act requirements to minimize bycatch (e.g. PFMC 2011a), this is considered to constitute an operational strategy for managing retained species.
			Testing supports high confidence that the strategy will work, based on information directly about the fishery and/or species involved.
			The OFL for the northern subpopulation of the northern anchovy was established in 2010 (PFMC 2011e). There have been a number of northern anchovy stock status reviews over time and, with Pacific sardine, is considered to be the coastal pelagic species that is least vulnerable to becoming overfished (PFMC 2010). It is considered that the northern anchovy strategy has been tested and that high

PI 2.1.2		There is a strategy in place for managing retained species that is designed to ensure the fishery does not pose a risk of serious or irreversible harm to retained species	
SG	Issue	Met? (Y/N)	Justification/Rationale
			<p>confidence exists that it will work.</p> <p>The 30 years of retained species data show that other species are not and/or cannot be taken in large quantities by the pole and troll gears used in the fishery. It is considered that these data show that the strategy works to keep the catch of retained species at very limited, negligible levels.</p>
	c	Y	<p>There is clear evidence that the strategy is being implemented successfully.</p> <p>Catch records for northern anchovy are available for at least the last 30 years. Catches must be reported and the number of licenses is limited (PFMC 2011c). It is considered that this constitutes clear evidence that the strategy for managing northern anchovy is being implemented successfully.</p> <p>Retained HMS species data show clearly that the amounts of catch of species other than albacore are very limited. The levels have declined over time, such that the average for the last 10 years for all named species or species groups has halved in comparison to the average for the last 30 years. Only the catch of ‘other’ retained species has been maintained at the same level (0.02 % of the albacore catch). The maintenance of the bycatch at very low levels shows that the fishery continues to be successful in targeting albacore.</p>
	d	Y	<p>There is some evidence that the strategy is achieving its overall objective.</p> <p>Catch records for northern anchovy are monitored and are available, and the stock is not considered to be overfished or to be experiencing overfishing (PFMC 2010).</p> <p>Catch records for the pole and troll fishery are available for at least 30 years that show the retained catch of species other than albacore is maintained at very low levels.</p>
References		PFMC 2010, PFMC 2011c, PFMC 2011e.	
OVERALL PERFORMANCE INDICATOR SCORE:			100
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 2.1.3

PI 2.1.3		Information on the nature and extent of retained species is adequate to determine the risk posed by the fishery and the effectiveness of the strategy to manage retained species	
SG	Issue	Met? (Y/N)	Justification/Rationale
60	a	Y	<p>Qualitative information is available on the amount of main retained species taken by the fishery.</p> <p>As the catch of no retained species exceeds 5% of the total albacore landings, it is considered that there are no main retained species in AAFA's North Pacific albacore fishery.</p>
	b	Y	<p>Information is adequate to qualitatively assess outcome status with respect to biologically based limits.</p> <p>There are no main retained species in the fishery.</p>
	c	Y	<p>Information is adequate to support measures to manage main retained species.</p> <p>There are no main retained species in the fishery.</p>
80	a	Y	<p>Qualitative information and some quantitative information are available on the amount of main retained species taken by the fishery.</p> <p>There are no main retained species in the fishery.</p>
	b	Y	<p>Information is sufficient to estimate outcome status with respect to biologically based limits.</p> <p>There are no main retained species in the fishery.</p>
	c	Y	<p>Information is adequate to support a partial strategy to manage main retained species.</p> <p>There are no main retained species in the fishery.</p>
	d	Y	<p>Sufficient data continue to be collected to detect any increase in risk level (e.g. due to changes in the outcome indicator score or the operation of the fishery or the effectiveness of the strategy)</p> <p>There are no main retained species in the fishery.</p>
100	a	N	<p>Accurate and verifiable information is available on the catch of all retained species and the consequences for the status of affected populations.</p> <p>The northern anchovy fishery is monitored, licenses are limited, and catches in the commercial anchovy fishery are required to be reported. Albacore fishermen operating in Washington and Oregon waters are also required to report anchovy harvest through logbook submissions on albacore catches, but there is no such requirement in California. There is an observer program on the commercial bait fishery, but this does not include the albacore vessels. It is therefore not clear that accurate and verifiable information on northern anchovy catches is available and the fishery cannot meet this level of performance. Therefore, while anchovy are thought to be abundant (NMFS 2012), there is no current information on the status of northern anchovy populations as the stock has not been assessed since 1995. Anchovy fisheries are managed based on annual harvest data, and the harvest has been low in recent years. Although not being recently assessed, the northern anchovy stock is not considered to be overfished or experiencing overfishing (PFMC 2010).</p> <p>Catches of retained HMS species in the albacore fishery are reported through a 100% logbook program and are monitored at landing sites (PFMC 2011a). While there is not a routine observer program on the fishery, and catches cannot therefore</p>

PI 2.1.3		Information on the nature and extent of retained species is adequate to determine the risk posed by the fishery and the effectiveness of the strategy to manage retained species	
SG	Issue	Met? (Y/N)	Justification/Rationale
			be verified at sea, there is no reason to suspect that catches exceed reported landings as there is no incentive to misreport catches of those species (i.e. the albacore fleet is not subject to quotas on the HMS species that are retained). The fishery is apparently considered to be low risk, as there was no recommendation to increase observer coverage or data collection in the fishery (e.g. NMFS 2011a).
	b	Y	Information is sufficient to quantitatively estimate outcome status with a high degree of certainty . The amount of northern anchovy and other retained species taken in the albacore fishery are very small, and are considered negligible in that they pose no risk of impacting those species. As such, the fishery meets this scoring issue.
	c	Y	Information is adequate to support a comprehensive strategy to manage retained species, and evaluate with a high degree of certainty whether the strategy is achieving its objective. Data on catches of northern anchovy and other species that are retained in the AAFA North Pacific albacore fishery are available for the last 30 years. It is considered that these are adequate to support a comprehensive strategy to manage those species, and that there can be a high degree of certainty that the strategy achieves its objective.
	d	Y	Monitoring of retained species is conducted in sufficient detail to assess ongoing mortalities to all retained species. Catches of northern anchovy in Washington and Orgeon are reported through logbooks, but there is no requirement to report quantities of northern anchovy taken off California. Nevertheless, voluntary submission of logbooks and an observer program ensure that the commercial fishery is monitored in sufficient detail to assess ongoing mortalities. The HMS species that are retained in the albacore fishery are reported in logbooks, and are monitored at landings. There is no reason to believe that these data are not accurate and, as such, it is considered that the data are sufficiently detailed to allow an ongoing assessment of all retained species.
References		NMFS 2011a, NMFS 2012, PFMC 2010.	
OVERALL PERFORMANCE INDICATOR SCORE:			95
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 2.2.1

PI 2.2.1		The fishery does not pose a risk of serious or irreversible harm to the bycatch species or species groups and does not hinder recovery of depleted bycatch species or species groups	
SG	Issue	Met? (Y/N)	Justification/Rationale
60	a	Y	Main bycatch species are likely to be within biologically based limits (if not, go to scoring issue b below).
			The pole & line and troll fishing gears employed in the AAFA North Pacific albacore fishery are highly selective; both are employed at the sea surface in deep water such that there is never any contact with the seabed, while the gears always remain attached to the vessel and must be actively fished. As such, while there are very low levels of retained species (PFMC 2011b), there will also inevitably be very low levels of bycatch, almost all of which will be albacore or, more rarely, other targeted HMS species. Because fish are hauled aboard immediately after they become hooked, fishermen are also quickly able to discern if an albacore shoal being targeted is made up of fish that are too small to be retained for economic or regulatory reasons. In such cases, lines can be pulled in quickly and the vessel moved in search of another shoal containing larger, marketable albacore.
			There is little information on actual bycatch levels, but preliminary analysis of limited observer data suggest that albacore less than 59cm in length accounted for approximately 5% of the total catch, and of those, 10% are returned (i.e. <0.5 % of the total catch is discarded) (PFMC 2007a). Albacore make up the vast majority of the catch, and so there are no main bycatch species in the AAFA North Pacific albacore pole and troll fishery.
80	b	Y	If main bycatch species are outside biologically based limits there are mitigation measures in place that are expected to ensure that the fishery does not hinder recovery and rebuilding.
			There are no main bycatch species in the fishery.
			If the status is poorly known there are measures or practices in place that are expected to result in the fishery not causing the bycatch species to be outside biologically based limits or hindering recovery.
100	a	Y	There is a high degree of certainty that bycatch species are within biologically based limits.
			Bycatch species are understood to be the same as those listed under retained species (e.g. PFMC 2007a), but individuals will be smaller than those that are retained. Post-release survival is likely to be relatively high in comparison to most other fisheries because of the rapid retrieval and ability to release, although survival will not be 100% and tagging studies showed that the survival was better with albacore hooked in the lower jaw rather than the upper jaw (PFMC 2007a).
			Importantly, the pole and troll mode of fishing ensures that bycatch and discarding of fish is a rare event and is negligible in its impact.



PI 2.2.1		The fishery does not pose a risk of serious or irreversible harm to the bycatch species or species groups and does not hinder recovery of depleted bycatch species or species groups	
SG	Issue	Met? (Y/N)	Justification/Rationale
References		PFMC 2007a, PFMC 2011b.	
OVERALL PERFORMANCE INDICATOR SCORE:			100
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 2.2.2

PI 2.2.2		There is a strategy in place for managing bycatch that is designed to ensure the fishery does not pose a risk of serious or irreversible harm to bycatch populations	
SG	Issue	Met? (Y/N)	Justification/Rationale
60	a	Y	There are measures in place, if necessary, which are expected to maintain main bycatch species at levels which are highly likely to be within biologically based limits or to ensure that the fishery does not hinder their recovery.
			As the catch of no bycatch species exceeds 5% of the total albacore landings, it is considered that there are no main bycatch species in AAFA's North Pacific albacore fishery.
60	b	Y	The measures are considered likely to work, based on plausible argument (e.g. general experience, theory or comparison with similar fisheries/species).
			There are no main bycatch species in the fishery.
80	a	Y	There is a partial strategy in place, if necessary, for managing bycatch species at levels which are highly likely to be within biologically based limits or to ensure that the fishery does not hinder their recovery.
			There are no main bycatch species in the fishery.
	b	Y	There is some objective basis for confidence that the partial strategy will work, based on some information directly about the fishery and/or the species involved.
80	c	Y	There is some evidence that the partial strategy is being implemented successfully.
			There are no main bycatch species in the fishery.
100	a	Y	There is a strategy in place for managing and minimising bycatch.
			The pole and troll method of fishing ensures that the capture of species other than albacore is a rare event and poses no risk to those species. There are negligible quantities of other species taken in the fishery, and bycatch of undersized albacore is unlikely to constitute anything approaching a significant number at around 0.5% of the retained albacore catch. The rapid return of the fish after hooking will allow for a relatively high proportion of these bycatch albacore to survive post-release.
	b	Y	The gear is clearly designed for and is successful at catching albacore rather than other species and, together with the Magnuson-Stevens Act requirements to minimize bycatch (e.g. PFMC 2011a) this is considered to constitute an operational strategy for managing bycatch species.
			Testing supports high confidence that the strategy will work, based on information directly about the fishery and/or species involved.
100	c	N	The 30 years of retained species data show that other species are not and/or cannot be taken in large quantities by the pole and troll gears used in the fishery. Although quantitative bycatch data are very limited, it is considered that, in combination with the retained species data, they show that the strategy works to keep the catch of bycatch species at very limited, negligible levels.
			There is clear evidence that the strategy is being implemented successfully.
100	d	N	The information available on bycatch levels is very limited, and little of that is publicly available, quantitative data. As such, it cannot be said there is clear evidence that the strategy is being implemented successfully.
			There is some evidence that the strategy is achieving its objective.

PI 2.2.2		There is a strategy in place for managing bycatch that is designed to ensure the fishery does not pose a risk of serious or irreversible harm to bycatch populations	
SG	Issue	Met? (Y/N)	Justification/Rationale
			The information available on bycatch levels is very limited, and little of that is publicly available, quantitative data. As such, it cannot be said there is some evidence that the strategy is achieving its objective.
References		PFMC 2011a.	
OVERALL PERFORMANCE INDICATOR SCORE:			90
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 2.2.3

PI 2.2.3		Information on the nature and the amount of bycatch is adequate to determine the risk posed by the fishery and the effectiveness of the strategy to manage bycatch	
SG	Issue	Met? (Y/N)	Justification/Rationale
60	a	Y	<p>Qualitative information is available on the main bycatch species affected by the fishery.</p> <p>No bycatch species exceeds 5% of the total albacore landings, and so it is considered that there are no main bycatch species in AAFA's North Pacific albacore fishery.</p>
	b	Y	<p>Information is adequate to broadly understand outcome status with respect to biologically based limits</p> <p>There are no main bycatch species in the fishery.</p>
	c	Y	<p>Information is adequate to support measures to manage bycatch.</p> <p>There are no main bycatch species in the fishery.</p>
80	a	Y	<p>Qualitative information and some quantitative information are available on the amount of main bycatch species affected by the fishery.</p> <p>There are no main bycatch species in the fishery.</p>
	b	Y	<p>Information is sufficient to estimate outcome status with respect to biologically based limits.</p> <p>There are no main bycatch species in the fishery.</p>
	c	Y	<p>Information is adequate to support a partial strategy to manage main bycatch species.</p> <p>There are no main bycatch species in the fishery.</p>
	d	Y	<p>Sufficient data continue to be collected to detect any increase in risk to main bycatch species (e.g., due to changes in the outcome indicator scores or the operation of the fishery or the effectiveness of the strategy).</p> <p>There are no main bycatch species in the fishery.</p>
100	a	N	<p>Accurate and verifiable information is available on the amount of all bycatch and the consequences for the status of affected populations.</p> <p>Although it is understood that bycatch levels are very limited such that they are effectively negligible, the information available on bycatch levels is also very limited, and little of that is publicly available, quantitative data. Although stock assessment information on HMS species taken in the fishery is available and could confirm that the AAFA bycatch is very unlikely to have any impact, it cannot be said that accurate and verifiable information on the amount of all bycatch is available. As such, the AAFA North Pacific albacore fishery cannot meet this scoring issue.</p>
	b	N	<p>Information is sufficient to quantitatively estimate outcome status with respect to biologically based limits with a high degree of certainty.</p> <p>Although it is understood that bycatch levels are very limited such that they are effectively negligible, the information available on bycatch levels is also very limited, and little of that is publicly available, quantitative data. Therefore, it cannot be said that information is sufficient to quantitatively estimate outcome status with respect to biologically-based limits with a high degree of certainty.</p>

PI 2.2.3		Information on the nature and the amount of bycatch is adequate to determine the risk posed by the fishery and the effectiveness of the strategy to manage bycatch	
SG	Issue	Met? (Y/N)	Justification/Rationale
	c	N	<p>Information is adequate to support a comprehensive strategy to manage bycatch, and evaluate with a high degree of certainty whether a strategy is achieving its objective.</p> <p>Although it is understood that bycatch levels are very limited such that they are effectively negligible, the information available on bycatch levels is also very limited, and little of that is publicly available, quantitative data. As such, it cannot be said that information is adequate to support a comprehensive strategy to manage bycatch, and to evaluate with a high degree of certainty whether the strategy is achieving its objective.</p>
	d	N	<p>Monitoring of bycatch data is conducted in sufficient detail to assess ongoing mortalities to all bycatch species.</p> <p>Although it is understood that bycatch levels are very limited such that they are effectively negligible, the information available on bycatch levels is also very limited, and little of that is publicly available, quantitative data. As such, it cannot be said that monitoring of bycatch data is conducted in sufficient detail to assess ongoing mortalities to all bycatch species.</p>
References		PFMC 2011a.	
OVERALL PERFORMANCE INDICATOR SCORE:			80
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 2.3.1

PI 2.3.1		The fishery meets national and international requirements for the protection of ETP species The fishery does not pose a risk of serious or irreversible harm to ETP species and does not hinder recovery of ETP species	
SG	Issue	Met? (Y/N)	Justification/Rationale
60	a	Y	<p>Known effects of the fishery are likely to be within limits of national and international requirements for protection of ETP species.</p> <p>A variety of protected marine mammal, turtle and seabird species occur in the area in which the AAFA North Pacific albacore fishery occurs (Table 6). However, the pole and troll fishery is highly selective with the gear always being attached and worked in very close proximity to the vessel, so the potential for interaction with any ETP species is considered to be very low. The use of barbless hooks helps to minimise the potential for mortality to occur in the event that any ET species were captured. The pole and troll fishery is not identified in any recovery or spotlight species action plan for marine mammals, turtles or seabirds (e.g. NMFS 1998a, NMFS 1998b, NMFS 2008b, Reeves <i>et al.</i> 1998, USFWS 2009a, USFWS 2009b). The 2012 NOAA 'List of Fisheries', assessed the North Pacific albacore pole and troll fisheries as Category III fishery (i.e. "<i>a remote likelihood or no known incidental mortality and serious injuries of marine mammals</i>"), with no marine mammal species killed (NOAA 2011a). The fishery exceeds the requirements of this scoring issue.</p>
	b	Y	<p>Known direct effects are unlikely to create unacceptable impacts to ETP species.</p> <p>Although there is very limited observer coverage in the fishery, when discussed during the site visit in 2011, SWFSC scientists who had participated in at-sea research and fishing surveys of the albacore stock were not unaware of any significant interaction issues between the fishery and ETP species. It is thought that perhaps one loggerhead turtle may be caught in the whole US west coast albacore pole and troll fishery (i.e. not just AAFA vessels) per year, but that no turtle would die as a result of an interaction with the fishery (NMFS 2004). Analysis of more than 60,000 daily log sheets from the whole pole and troll fishery in 2000 and 2005 showed only two interactions with albatross species, both of which were released (although the species and condition on release were not listed) (SWFSC pers. comm.). A single humpback whale was reportedly snagged off California in 1997 by a trolling vessel (not necessarily an AAFA vessel), but the injury was not considered serious (PFMC 2007b). The fishery exceeds the requirements of this scoring issue.</p>
80	a	Y	<p>The effects of the fishery are known and are highly likely to be within limits of national and international requirements for protection of ETP species.</p> <p>The nature of the fishing gear used in the pole and troll fishery ensures that the potential for the fishery to interact with ETP species is very low. The fishery is assessed as a Category III fishery in the 2012 NOAA List of Fisheries (NOAA 2011a), and the fishery was not identified in any recovery or spotlight species action plan. The fishery exceeds the requirements of this scoring issue.</p>
	b	Y	<p>Direct effects are highly unlikely to create unacceptable impacts to ETP species.</p> <p>There is a very low possibility of direct interactions of the fishery with marine mammals, or of entanglement with turtles and albatross. All such interactions are considered to be rare events (estimated 1 loggerhead turtle per year in the whole US west coast albacore pole and troll fishery- NMFS 2004, and an average of 1 albatross per year reported from the whole pole and troll fishery - SWFSC pers. comm.), and the nature of the gear provides captured animals with a good chance of survival. The fishery exceeds the requirements of this scoring issue.</p>

	c	Y	<p>Indirect effects have been considered and are thought to be unlikely to create unacceptable impacts.</p> <p>Potential routes for the AAFA pole and troll fishery to indirectly impact ETP species are through the capture of northern anchovy or albacore that would otherwise be consumed by ETP species, or through becoming entangled in or ingesting lost gear. Fishing pressure on northern anchovy is limited and the stocks are not overfished or experiencing overfishing (PFMC 2010). The albacore stock in the North Pacific is also not overfished or experiencing overfishing. Because the pole and troll gear is always attached to the vessel, the potential for gear loss is low. Even if gear is lost, though, the lines are short and the attached hook or jig should ensure that any lost lines quickly sink to the seabed, rather than continuing to be available to ETP species such as seabirds or turtles near to the surface. It is considered that the fishery exceeds the requirements of this scoring issue.</p>
100	a	Y	<p>There is a high degree of certainty that the effects of the fishery are within limits of national and international requirements for protection of ETP species.</p> <p>There has been very limited observer coverage of the US west coast albacore pole and troll fishery, and there is no observer plan currently in place. Nevertheless, the nature of the fishery (the use of barbless hooks and the gear always being attached and worked in very close proximity to the vessel), its assessment as a Category III fishery for marine mammal bycatch (NOAA 2011a), as well as the various recovery or spotlight species action plans for marine mammals, turtles or seabirds that do not consider the pole and troll fishery to be an impacting factor, provide a high degree of certainty that the fishery's effects are within limits of national and international requirements for ETP species protection.</p>
	b	Y	<p>There is a high degree of confidence that there are no significant detrimental direct effects of the fishery on ETP species.</p> <p>There is only one known direct interaction of the whole US west coast albacore pole and troll fishery with a marine mammal, but there is the possibility of entanglement with turtles and albatross. However, these are considered to be rare events (estimated 1 loggerhead turtle per year for the whole fishery- NMFS 2004, and an average of 1 albatross per year reported for the whole fishery- SWFSC pers. comm.). The nature of the gear also provides captured animals with a good chance of survival. It is considered that the fishery meets this scoring issue.</p>
	c	Y	<p>There is a high degree of confidence that there are no significant detrimental indirect effects of the fishery on ETP species.</p> <p>Potential indirect effects of the fishery on ETP species are considered to be through the capture of northern anchovy or albacore that would otherwise be consumed by ETP species, and through those species becoming entangled in or ingesting lost gear. The status of northern anchovy and albacore, and the nature of the fishing gear that all but eliminates the potential for entanglement or ghost fishing, provides a high degree of confidence that there are no significant detrimental indirect effects of the fishery on ETP species.</p>
References			NMFS 1998a, NMFS 1998b, NMFS 2004, NMFS 2008b, PFMC 2010, Reeves <i>et al.</i> 1998, USFWS 2009a, USFWS 2009b.
OVERALL PERFORMANCE INDICATOR SCORE:			100
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 2.3.2

PI 2.3.2		The fishery has in place precautionary management strategies designed to: <ul style="list-style-type: none"> • Meet national and international requirements; • Ensure the fishery does not pose a risk of serious harm to ETP species; • Ensure the fishery does not hinder recovery of ETP species; and • Minimise mortality of ETP species. 	
SG	Issue	Met? (Y/N)	Justification/Rationale
60	a	Y	<p>There are measures in place that minimise mortality, and are expected to be highly likely to achieve national and international requirements for the protection of ETP species.</p> <p>The pole and troll albacore fishery is highly selective with the gear always being attached and actively worked in very close proximity to the vessel, while the gear is retrieved as soon as anything is hooked and barbless hooks are used. The lines are short and loss of fishing gear is likely to be relatively rare, with any lost gear likely to quickly drop to the seafloor. The northern anchovy and albacore fisheries are monitored and are not considered to be overfished or experiencing overfishing.</p> <p>These features of the fishery minimise the potential for any direct interactions with ETP species, while also minimising the potential for mortality in the event that anything was hooked but subsequently released. The rare likelihood of gear loss and the status of the northern anchovy and albacore stocks minimise the potential for indirect impacts. Together, these features combine to form an operational strategy for managing the fishery's impact on ETP species, and so the fishery exceeds the requirements of this scoring guidepost.</p>
	b	Y	<p>The measures are considered likely to work, based on plausible argument (e.g., general experience, theory or comparison with similar fisheries/species).</p> <p>The HMS FMP states that "<i>Protected species interactions with the other gear types</i> (i.e. the pole and troll fishery) <i>are not major issues</i>" (PFMC 2007a), while the pole and troll fishery for albacore is not listed in any of the relevant recovery or spotlight species action plan for marine mammals, turtles or seabirds (e.g. NMFS 1998a, NMFS 1998b, NMFS 2008b, Reeves <i>et al.</i> 1998, USFWS 2009a, USFWS 2009b), and additional measures are not specified in the HMS FMP (PFMC 2007a), such that it can be concluded that the that the operational strategy will work and the fishery meets this scoring issue.</p>
80	a	Y	<p>There is a strategy in place for managing the fishery's impact on ETP species, including measures to minimise mortality, that is designed to be highly likely to achieve national and international requirements for the protection of ETP species.</p> <p>All sea turtles taken in US HMS fisheries are required to be handled in accordance with US Federal Regulations (i.e. to be released if active or dead, or to be resuscitated if comatose or inactive) (NOAA 2011b). This regulation, and the features of the fishery described under SG60a, are considered to constitute a strategy for managing the fishery's impact on ETP species that is highly likely to achieve national and international requirements for the protection of ETP species.</p>
	b	Y	<p>There is an objective basis for confidence that the strategy will work, based on information directly about the fishery and/or the species involved.</p> <p>The features of the pole and troll fishery, in particular that the lines are always attached and actively worked in close proximity to the vessel, and are retrieved as soon as anything is hooked, provide an objective basis for confidence that the strategy will work. The fishery meets this scoring issue.</p>
	c	Y	There is evidence that the strategy is being implemented successfully.

PI 2.3.2		<p>The fishery has in place precautionary management strategies designed to:</p> <ul style="list-style-type: none"> • Meet national and international requirements; • Ensure the fishery does not pose a risk of serious harm to ETP species; • Ensure the fishery does not hinder recovery of ETP species; and • Minimise mortality of ETP species. 	
SG	Issue	Met? (Y/N)	Justification/Rationale
			Sea turtle interactions with the whole US west coast albacore pole and troll fishery are considered to be very rare (NMFS 2004), logbook data and the personal experience of the SWFSC scientists who participated in the site visit indicate that albatross interactions are very rare, and there is only one known interaction between the whole pole and troll fishery and a marine mammal (a humpback that was not thought to be seriously injured (PFMC 2007b). It is considered that this provides evidence that the strategy is being implemented successfully.
100	a	N	<p>There is a comprehensive strategy in place for managing the fishery’s impact on ETP species, including measures to minimise mortality that is designed to achieve above national and international requirements for the protection of ETP species.</p> <p>The MSC defines a comprehensive strategy as “<i>a complete and tested strategy made up of linked monitoring, analyses, and management measures and responses.</i>” The operational strategy that the AAFA pole and troll fishery maintains cannot be considered to be comprehensive because of the lack of an ongoing observer program. This prevents the fishery from meeting the monitoring requirement of a comprehensive strategy.</p>
	b	Y	<p>The strategy is mainly based on information directly about the fishery and/or species involved, and a quantitative analysis supports high confidence that the strategy will work.</p> <p>The Biological Opinion on the West Coast HMS fisheries (NMFS 2004) was formed on a quantitative analysis of the anticipated incidental take of listed (ETP) species. The whole US west coast albacore pole and troll fishery was thought likely to catch one loggerhead turtle per year, but that mortality as a result of the interaction was unlikely. The analysis confirmed that the incidental take was not likely to result in jeopardy of loggerhead, or of other sea turtle or marine mammal species. It is therefore considered that the fishery meets this scoring issue.</p>
	c	N	<p>There is clear evidence that the strategy is being implemented successfully.</p> <p>There has been very limited observer coverage of the US west coast albacore pole and troll fishery, and there is no observer plan currently in place. In the absence of independent data, the fishery cannot meet this scoring indicator.</p>
	d	N	<p>There is evidence that the strategy is achieving its objective.</p> <p>There has been very limited observer coverage of the US west coast albacore pole and troll fishery, and there is no observer plan currently in place. In the absence of independent data, the fishery cannot meet this scoring indicator.</p>
References		NMFS 1998a, NMFS 1998b, NMFS 2004, NMFS 2008b, NOAA 2011b, PFMC 2007a, PFMC 2007b, Reeves <i>et al.</i> 1998, USFWS 2009a, USFWS 2009b.	
OVERALL PERFORMANCE INDICATOR SCORE:			85
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 2.3.3

PI 2.3.3		Relevant information is collected to support the management of fishery impacts on ETP species including:	
SG	Issue	Met? (Y/N)	Justification/Rationale
60	a	Y	Information is sufficient to qualitatively estimate the fishery related mortality of ETP species.
			The nature of the fishery, including the gear types in use and the method of working the gear, provides sufficient information to infer that the AAFA fishery poses almost no risk to ETP turtle, seabird or marine mammal species. The fishery meets this scoring issue.
	b	Y	Information is adequate to broadly understand the impact of the fishery on ETP species.
			The nature of the fishery, including the gear types in use and the method of working the gear, is adequate to understand that the AAFA fishery poses almost no risk to ETP turtle, seabird or marine mammal species. The fishery meets this scoring issue.
	c	Y	Information is adequate to support measures to manage the impacts on ETP species.
			The nature of the fishery, including the gear types in use and the method of working the gear, provides adequate information to confirm that the operational strategy in use is effective at minimising the risk posed by the fishery to ETP turtle, seabird or marine mammal species. The fishery meets this scoring issue.
80	a	Y	Sufficient data are available to allow fishery related mortality and the impact of fishing to be quantitatively estimated for ETP species.
			Comprehensive logbook data are available and can be interrogated to provide quantitative information on fishery interactions with ETP species. Independent observer data are available for a very limited number of trips within the albacore pole and troll fishery. The fishery meets this scoring issue.
	b	Y	Information is sufficient to determine whether the fishery may be a threat to protection and recovery of the ETP species.
			There are very few known interactions between the US west coast albacore pole and troll fishery and ETP turtles, seabirds or marine mammals. The Biological Opinion confirmed that the incidental take was not likely to result in jeopardy of loggerhead, or of other sea turtle or marine mammal species (NMFS 2004). It is considered that the information is sufficient to determine that the fishery is not a threat to protection and recovery of the ETP species.
	c	Y	Information is sufficient to measure trends and support a full strategy to manage impacts on ETP species.
			Fishermen continue to be required to submit logbooks within 24 hours of making a landing. Comprehensive logbook data are available for a number of decades and can be interrogated to provide quantitative information on fishery interactions with ETP species. The fishery meets this scoring issue.
100	a	N	Information is sufficient to quantitatively estimate outcome status of ETP species with a high degree of certainty.
			There has been very limited observer coverage of the US west coast albacore pole and troll fishery, and there is no observer plan currently in place. In the absence of independent data, the fishery cannot meet this scoring indicator.

PI 2.3.3		<p>Relevant information is collected to support the management of fishery impacts on ETP species including:</p> <ul style="list-style-type: none"> • Information for the development of the management strategy; • Information to assess the effectiveness of the management strategy; and • Information to determine the outcome status of ETP species. 	
SG	Issue	Met? (Y/N)	Justification/Rationale
	b	N	<p>Accurate and verifiable information is available on the magnitude of all impacts, mortalities and injuries and the consequences for the status of ETP species.</p> <p>There has been very limited observer coverage of the US west coast albacore pole and troll fishery, and there is no observer plan currently in place. In the absence of independent data, the fishery cannot meet this scoring indicator.</p>
	c	N	<p>Information is adequate to support a comprehensive strategy to manage impacts, minimise mortality and injury of ETP species, and evaluate with a high degree of certainty whether a strategy is achieving its objectives.</p> <p>There has been very limited observer coverage of the US west coast albacore pole and troll fishery, and there is no observer plan currently in place. In the absence of independent data, the fishery cannot meet this scoring indicator.</p>
References		NMFS 2004.	
OVERALL PERFORMANCE INDICATOR SCORE:			80
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 2.4.1

PI 2.4.1		The fishery does not cause serious or irreversible harm to habitat structure, considered on a regional or bioregional basis and function	
SG	Issue	Met? (Y/P/N)	Justification/Rationale
60	a	Y	The fishery is unlikely to reduce habitat structure and function to a point where there would be serious or irreversible harm.
			The AAFA North Pacific albacore pole and troll fishery operates entirely at the surface in deep, oceanic water. There is therefore no risk that the fishery contacts the seabed, and any impacts on the pelagic habitat would be imperceptible and highly transient.
			Please note, as the northern anchovy is considered against the retained species PIs, there is no further requirement to assess the baitfish fishery (e.g., here, against the habitat PIs).
80	a	Y	The fishery is highly unlikely to reduce habitat structure and function to a point where there would be serious or irreversible harm.
			The AAFA North Pacific albacore pole and troll fishery operates entirely at the surface in deep, oceanic water. There is therefore no risk that the fishery contacts the seabed, and any impacts on the pelagic habitat would be imperceptible and highly transient.
100	a	Y	There is evidence that the fishery is highly unlikely to reduce habitat structure and function to a point where there would be serious or irreversible harm.
			The AAFA North Pacific albacore pole and troll fishery operates entirely at the surface in deep, oceanic water. The nature of the gear, the areas in which the fishery operates and the species that are landed all provide evidence that the fishery is highly unlikely to ever come in to contact with the seabed, while there is no mechanism by which the fishery could impact pelagic habitats in anything other than an imperceptible and highly transient manner. As such, the fishery is not considered to impact habitat structure and function in any way.
References			
OVERALL PERFORMANCE INDICATOR SCORE:			100
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 2.4.2

PI 2.4.2		There is a strategy in place that is designed to ensure the fishery does not pose a risk of serious or irreversible harm to habitat types	
SG	Issue	Met? (Y/N)	Justification/Rationale
60	a	Y	<p>There are measures in place, if necessary, that are expected to achieve the Habitat Outcome 80 level of performance.</p> <p>The AAFA North Pacific albacore pole and troll fishery operates entirely at the surface in deep, oceanic water. The fishery does not contact the seabed and any pelagic habitat impacts will be imperceptible and highly transient. No additional measures are therefore needed in order to achieve the habitat outcome 80 level of performance.</p> <p>Please note, as the northern anchovy is considered against the retained species PIs, there is no further requirement to assess the baitfish fishery (e.g., here, against the habitat PIs).</p>
	b	Y	<p>The measures are considered likely to work, based on plausible argument (e.g. general experience, theory or comparison with similar fisheries/habitats).</p> <p>The fishery operates entirely at the surface in deep, oceanic water.</p>
80	a	Y	<p>There is a partial strategy in place, if necessary, that is expected to achieve the Habitat Outcome 80 level of performance or above.</p> <p>The fishery operates entirely at the surface in deep, oceanic water. The fishery does not contact the seabed and any pelagic habitat impacts will be imperceptible and highly transient. An additional partial strategy is therefore unnecessary in order to achieve the habitat outcome 80 level of performance.</p>
	b	Y	<p>There is some objective basis for confidence that the partial strategy will work, based on information directly about the fishery and/or habitats involved.</p> <p>The fishery operates entirely at the surface in deep, oceanic water.</p>
	c	Y	<p>There is some evidence that the partial strategy is being implemented successfully.</p> <p>The fishery operates entirely at the surface in deep, oceanic water.</p>
100	a	Y	<p>There is a strategy in place for managing the impact of the fishery on habitat types.</p> <p>The fishery operates entirely at the surface in deep, oceanic water. The nature of the gear, the habits of the target species and the areas in which the fishery operates mean that there is no possibility of the fishery contacting the seabed, while any pelagic impacts will be imperceptible and highly transient. These features of the fishery can be considered to constitute an operational strategy for managing the impact of the fishery on habitat types.</p>
	b	Y	<p>Testing supports high confidence that the strategy will work, based on information directly about the fishery and/or habitats involved.</p> <p>To the knowledge of the assessment team, there has been no specific testing to determine if the AAFA albacore fishery impacts habitats, but the nature of the gear and the area in which the fishery operates (i.e. deep, oceanic water) makes any testing unnecessary. The fishery is considered to meet this scoring issue.</p>
	c	Y	<p>There is clear evidence that that strategy is being implemented successfully.</p> <p>The fishery operates entirely at the surface in deep, oceanic water. The nature of the gear, the habits of the target species, the areas in which the fishery operates and the</p>

PI 2.4.2		There is a strategy in place that is designed to ensure the fishery does not pose a risk of serious or irreversible harm to habitat types	
SG	Issue	Met? (Y/N)	Justification/Rationale
			retained species profile provide clear evidence that the strategy is being implemented successfully.
	d	Y	There is some evidence that the strategy is achieving its objective.
			Habitat impacts from this fishery are not monitored. However, there is no possibility of the fishery contacting the seabed, while any pelagic impacts will be imperceptible and highly transient. As such, it is considered that this scoring issue is met.
References			
OVERALL PERFORMANCE INDICATOR SCORE:			100
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 2.4.3

PI 2.4.3		Information is adequate to determine the risk posed to habitat types by the fishery and the effectiveness of the strategy to manage impacts on habitat types	
SG	Issue	Met? (Y/N)	Justification/Rationale
60	a	Y	There is basic understanding of the types and distribution of main habitats in the area of the fishery.
			The AAFA North Pacific albacore pole and troll fishery operates entirely at the surface in deep, oceanic water, along fronts and upwelling boundaries within the North Pacific Transition Zone (NPTZ) and the California Current System (CCS) off the US West Coast (Laurs & Lynn 1991). As the fishery does not contact the seabed, only the sea surface pelagic habitat of the North Pacific can be considered to be a main habitat type. These pelagic systems cover very extensive areas. Please note, as the northern anchovy is considered against the retained species PIs, there is no further requirement to assess the baitfish fishery (e.g., here, against the habitat PIs).
	b	Y	Information is adequate to broadly understand the nature of the main impacts of gear use on the main habitats, including spatial overlap of habitat with fishing gear. The surface pelagic habitat within and around the NPTZ and the CCS constitute the main habitat of the albacore that are targeted in the AAFA fishery. The nature of the pole and troll gear means that no seabed habitats will be impacted, while any impacts to the surface pelagic habitat will be imperceptible and highly transient.
80	a	Y	The nature, distribution and vulnerability of all main habitat types in the fishery are known at a level of detail relevant to the scale and intensity of the fishery.
			The areas in which the pole and troll fishery occurs are closely linked to the NPTZ and to coastal upwelling sites within the CCS (Laurs <i>et al.</i> 1984, Laurs & Lynn 1991, Childers <i>et al.</i> 2011). These systems have been described and well studied (e.g. Ayers & Lozier 2010, Miller <i>et al.</i> 1999), and it must be concluded that these surface pelagic habitats are not vulnerable to fishing activities of the scale and intensity of the AAFA pole and troll fishery.
	b	Y	Sufficient data are available to allow the nature of the impacts of the fishery on habitat types to be identified and there is reliable information on the spatial extent of interaction, and the timing and location of use of the fishing gear. The surface pelagic habitat within the NPTZ and the CCS where the AAFA fishery operates is very extensive. The impact of the vessel passage and gear use in the surface waters must be considered imperceptible and highly transient.
100	a	Y	Sufficient data continue to be collected to detect any increase in risk to habitat (e.g. due to changes in the outcome indicator scores or the operation of the fishery or the effectiveness of the measures).
			The AAFA North Pacific albacore pole and troll fishery operates at the surface, and the nature and distribution of the target species ensures that there is no chance that the operation of the fishery can change significantly, or that the risk to the pelagic or seabed habitats will increase.
100	a	Y	The distribution of habitat types is known over their range, with particular attention to the occurrence of vulnerable habitat types.
			The NPTZ and the CCS with its associated upwelling fronts have been studied (e.g. Ayers & Lozier 2010, Laurs & Lynn 1991, Miller <i>et al.</i> 1999). These are not vulnerable systems in the context of surface pelagic fishing activity.

	b	Y	<p>The physical impacts of the gear on the habitat types have been quantified fully.</p> <p>The nature of the pole and troll albacore gears means that there is considered to be no risk to seabed or pelagic habitats. Essentially, nothing the AAFA pole and troll fleet does or can do will physically impact the seabed or pelagic systems in anything other than an imperceptible and highly transient manner.</p>
	c	Y	<p>Changes in habitat distributions over time are measured.</p> <p>The NPTZ and the CCS with its associated upwelling fronts have been studied (e.g. Ayers & Lozier 2010, Laurs & Lynn 1991, Miller <i>et al.</i> 1999). The location and nature of the NPTZ and CCS are known to vary over time, but this variation is driven by climate and physical forcing (e.g. from wind) rather than as a result of fishing activity.</p>
References			Ayers & Lozier 2010, Laurs <i>et al.</i> 1984, Laurs & Lynn 1991, Miller <i>et al.</i> 1999.
OVERALL PERFORMANCE INDICATOR SCORE:			100
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 2.5.1

PI 2.5.1		The fishery does not cause serious or irreversible harm to the key elements of ecosystem structure and function	
SG	Issue	Met? (Y/P/N)	Justification/Rationale
60	a	Y	The fishery is unlikely to disrupt the key elements underlying ecosystem structure and function to a point where there would be a serious or irreversible harm.
			<p>Key elements of the AAFA North Pacific albacore fishery ecosystem are considered to be the northern anchovy as a forage fish and bait species, albacore as a high trophic-level predator, other HMS species as competitors and predators of albacore, and the NPTZ and CCS as the key habitat of albacore in the parts of the North Pacific fished by the AAFA fleet.</p> <p>The nature of the gear employed in the fishery, the negligible quantities of retained species and bycatch, the status of northern anchovy (not overfished or experiencing overfishing) and the large area of the NPTZ and CCS over which the fishery operates mean that it is considered that the fishery is unlikely to disrupt key elements underlying ecosystem structure and function to a point where there would be a serious or irreversible harm.</p>
80	a	Y	The fishery is highly unlikely to disrupt the key elements underlying ecosystem structure and function to a point where there would be a serious or irreversible harm.
			<p>The nature of the gear employed in the fishery, the negligible quantities of retained species and bycatch, the status of northern anchovy (not overfished or experiencing overfishing) and the large area of the NPTZ and CCS over which the fishery operates mean that it is considered that the fishery is highly unlikely to disrupt key elements underlying ecosystem structure and function to a point where there would be a serious or irreversible harm.</p>
100	a	Y	There is evidence that the fishery is highly unlikely to disrupt the key elements underlying ecosystem structure and function to a point where there would be a serious or irreversible harm.
			The quantity of northern anchovy bait that is used by the AAFA fleet is small in comparison to other fisheries, and it is considered that the northern anchovy stocks currently experience limited targeted fishing pressure and relatively low levels of landings, and are not overfished or experiencing overfishing (PFMC 2010).
			The North Pacific albacore stock is currently not overfished or experiencing overfishing, and albacore is not a keystone predator or prey species in the North Pacific (Kitchell <i>et al.</i> 1999). More information on the impact of albacore fishery removals at the ecosystem level would be useful but is not considered a requirement in order for the fishery to meet this level of performance at this time, given the stock status.
			While the impact of albacore feeding on northern anchovy can be detected in the subsequent recruitment to northern anchovy stocks (Glaser 2009), there is no indication that the removal of albacore by the AAFA fishery impacts northern anchovy recruitment.
			The surface pelagic habitat of the NPTZ and the CCS covers an enormous area and these features are affected only by climate and physical forcing (i.e., weather, water currents, etc.); there is nothing that the AAFA fishery can do that would impact the nature of those habitats in anything other than an imperceptible and highly transient way.



PI 2.5.1		The fishery does not cause serious or irreversible harm to the key elements of ecosystem structure and function	
SG	Issue	Met? (Y/P/N)	Justification/Rationale
			It is considered that there is evidence that the AAFA North Pacific albacore fishery is highly unlikely to disrupt the key elements underlying ecosystem structure and function to a point where there would be a serious or irreversible harm.
References		Glaser 2009, Kitchell <i>et al.</i> 1999, PFMC 2010.	
OVERALL PERFORMANCE INDICATOR SCORE:			100
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 2.5.2

PI 2.5.2		There are measures in place to ensure the fishery does not pose a risk of serious or irreversible harm to ecosystem structure and function	
SG	Issue	Met? (Y/N)	Justification/Rationale
60	a	Y	There are measures in place, if necessary.
			Key elements of the AAFA North Pacific albacore fishery ecosystem are considered to be the northern anchovy as a forage fish and bait species, albacore as a high trophic-level predator, other HMS species as competitors and predators of albacore, and the NPTZ and CCS as the key habitat of albacore in the parts of the North Pacific fished by the AAFA fleet.
			It is considered that there is evidence that the fishery is highly unlikely to disrupt the key elements underlying ecosystem structure and function to a point where there would be a serious or irreversible harm. As such, it is considered that no additional measures are needed in order to achieve the ecosystem outcome 80 level of performance.
	b	Y	The measures take into account potential impacts of the fishery on key elements of the ecosystem.
			It is considered highly unlikely that the fishery poses a risk to key elements of the ecosystem.
	c	Y	The measures are considered likely to work, based on plausible argument (e.g., general experience, theory or comparison with similar fisheries/ecosystems).
It is considered highly unlikely that the fishery poses a risk to key elements of the ecosystem.			
80	a	Y	There is a partial strategy in place, if necessary.
			It is considered that there is evidence that the fishery is highly unlikely to disrupt the key elements underlying ecosystem structure and function to a point where there would be a serious or irreversible harm. As such, it is considered that a partial strategy is not necessary in order to achieve the ecosystem outcome 80 level of performance.
	b	Y	The partial strategy takes into account available information and is expected to restrain impacts of the fishery on the ecosystem so as to achieve the Ecosystem Outcome 80 level of performance.
			It is considered highly unlikely that the fishery poses a risk to key elements of the ecosystem.
	c	Y	The partial strategy is considered likely to work, based on plausible argument (e.g., general experience, theory or comparison with similar fisheries/ecosystems).
			It is considered highly unlikely that the fishery poses a risk to key elements of the ecosystem.
	d	Y	There is some evidence that the measures comprising the partial strategy are being implemented successfully .
			It is considered highly unlikely that the fishery poses a risk to key elements of the ecosystem.
100	a	Y	There is a strategy that consists of a plan , in place.
			The HMS Fishery Management Plan and the CPS Fishery Management Plan list a range of objectives and goals which together form a plan to minimise and manage impacts of the fishery on the ecosystem. For example, these include i) that harvest

PI 2.5.2		There are measures in place to ensure the fishery does not pose a risk of serious or irreversible harm to ecosystem structure and function	
SG	Issue	Met? (Y/N)	Justification/Rationale
			<p>strategies are implemented which achieve optimal yield for long-term sustainable harvest levels, ii) to minimize bycatch and avoid discard and implement measures to adequately account for total bycatch and discard mortalities, and iii) to maintain, restore or enhance the current quantity and productive capacity of habitats to increase fishery productivity for the benefits of the resource and commercial and recreational fisheries for highly migratory species.</p> <p>It is considered that there is evidence in the form of the nature of the gear employed in the fishery, the negligible quantities of retained species and bycatch, the status of northern anchovy and the large area of the NPTZ and CCS over which the fishery operates that these objectives have been made operational and that the fishery is highly unlikely to disrupt the key elements underlying ecosystem structure and function to a point where there would be a serious or irreversible harm.</p>
	b	Y	<p>The strategy, which consists of a plan, contains measures to address all main impacts of the fishery on the ecosystem, and at least some of these measures are in place. The plan and measures are based on well-understood functional relationships between the fishery and the Components and elements of the ecosystem.</p> <p>This plan provides for development of a full strategy that restrains impacts on the ecosystem to ensure the fishery does not cause serious or irreversible harm.</p> <p>The HMS and CPS Fishery Management Plans contain measures to address all main impacts of the fishery on the ecosystem, and the measures are in place. It is considered that the measures are based on well-understood functional relationships between the fishery and the ecosystem, and that impacts are restrained to ensure the fishery does not cause serious or irreversible harm. . As such, the fishery meets this scoring issue.</p>
	c	Y	<p>The measures are considered likely to work based on prior experience, plausible argument or information directly from the fishery/ecosystems involved.</p> <p>There is a plan and an operational strategy that, based on information directly from the fishery, is considered to be working to manage all the main impacts of the fishery on the ecosystem. As such, this scoring issues has been met</p>
	d	Y	<p>There is evidence that the measures are being implemented successfully.</p> <p>The fishery is considered to have minimal potential to cause serious or irreversible harm, and the HMS and CPS Fishery Management Plans are operational. As such, it is considered that the measures are being implemented successfully, and the fishery meets this scoring issue.</p>
References		PFMC 2011a, PFMC 2011e.	
OVERALL PERFORMANCE INDICATOR SCORE:			100
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 2.5.3

PI 2.5.3		There is adequate knowledge of the impacts of the fishery on the ecosystem	
SG	Issue	Met? (Y/N)	Justification/Rationale
60	a	Y	Information is adequate to identify the key elements of the ecosystem (e.g., trophic structure and function, community composition, productivity pattern and biodiversity).
			Key elements of the AAFA North Pacific albacore fishery ecosystem can be identified and are considered to be the northern anchovy as a forage fish and bait species, albacore as a high trophic-level predator, other HMS species as competitors and predators of albacore, and the NPTZ and CCS as the key habitat of albacore in the parts of the North Pacific fished by the AAFA fleet.
	b	Y	Main impacts of the fishery on these key ecosystem elements can be inferred from existing information, and have not been investigated in detail .
			The main impacts of the fishery on the key ecosystem elements can be inferred from existing information. There is specific and detailed information, however, allowing the fishery to meet and exceed the requirements of this scoring issue.
80	a	Y	Information is adequate to broadly understand the key elements of the ecosystem.
			Northern anchovy have been studied for many years and a body of knowledge exists that exceeds the requirements of this scoring issue (e.g. PFMC 2010, PFMC 2011c). Albacore is an important commercial and recreational target fish species, and again a body of knowledge exists that exceeds the requirements of this scoring issue (e.g. Childers <i>et al.</i> 2011, Laurs & Lynn 1991, PFMC 2011a). Other HMS species including billfish, tuna and shark species are managed and assessed in a detail that exceeds the requirements of this scoring issue (e.g. PFMC 2011a), while the NPTZ and CCS are important oceanographic features that have been well studied over time (e.g. Ayers & Lozier 2010, Miller <i>et al.</i> 1999).
	b	Y	Main impacts of the fishery on these key ecosystem elements can be inferred from existing information and some have been investigated in detail .
			It is considered that the fishery exceeds the requirements of this scoring issue, and so the key information is provided under SG100b.
	c	Y	The main functions of the Components (i.e., target, Bycatch, Retained and ETP species and Habitats) in the ecosystem are known .
			It is considered that the fishery exceeds the requirements of this scoring issue, and so the key information is provided under SG100c.
	d	Y	Sufficient information is available on the impacts of the fishery on these Components to allow some of the main consequences for the ecosystem to be inferred.
			It is considered that the fishery exceeds the requirements of this scoring issue, and so the key information is provided under SG100d.
	e	Y	Sufficient data continue to be collected to detect any increase in risk level (e.g., due to changes in the outcome indicator scores or the operation of the fishery or the effectiveness of the measures).
			Monitoring of the northern anchovy, albacore and other HMS stocks and fisheries is ongoing, and results are reported on annually, while the AAFA fishery poses no risk to the physical functioning of the NPTZ or CCS. The fishery meets this scoring issue.

PI 2.5.3		There is adequate knowledge of the impacts of the fishery on the ecosystem	
SG	Issue	Met? (Y/N)	Justification/Rationale
100	b	Y	Main interactions between the fishery and these ecosystem elements can be inferred from existing information, and have been investigated .
			Northern anchovy and the North Pacific albacore are currently not overfished or experiencing overfishing (PFMC 2010, PFMC 2011a). There are very limited quantities of retained and bycatch species taken in the fishery (PFMC 2011a), and those quantities are considered to be negligible in their impact, while albacore is not considered to be a keystone predator or prey species in the North Pacific (Kitchell <i>et al.</i> 1999). The NPTZ and CCS are enormous oceanographic features that are not impacted by any fishing activity. It is considered that the fishery meets the requirements of this scoring issue.
	c	Y	The impacts of the fishery on target, Bycatch and ETP species are identified and the main functions of these Components in the ecosystem are understood .
			Northern anchovy is an important forage fish species that has been studied for a number of decades, while the role of albacore and other HMS species within the pelagic foodweb has been studied (Kitchell <i>et al.</i> 1999). The role of the NPTZ and CCS in enhancing productivity is well established (e.g. Ayers & Lozier 2010, Laurs & Lynn 1991).
	d	Y	Sufficient information is available on the impacts of the fishery on the Components and elements to allow the main consequences for the ecosystem to be inferred.
			<p>The quantity of northern anchovy bait that is used by the AAFA fleet is small in comparison to other fisheries, but in any case it is considered that the northern anchovy stocks currently experience limited targeted fishing pressure and relatively low levels of landings, and are not overfished or experiencing overfishing (PFMC 2010). The North Pacific albacore stock is currently not overfished or experiencing overfishing, and albacore is not a keystone predator or prey species in the North Pacific (Kitchell <i>et al.</i> 1999). While the impact of albacore feeding on northern anchovy can be detected in the subsequent recruitment to northern anchovy stocks (Glaser 2009), there is no indication that the removal of albacore by the AAFA fishery impacts northern anchovy recruitment.</p> <p>The surface pelagic habitat of the NPTZ and the CCS covers an enormous area and these features are affected only by climate and physical forcing; there is nothing that the AAFA fishery can do that would impact the nature of those habitats in anything other than an imperceptible and highly transient way.</p>
	e	Y	Information is sufficient to support the development of strategies to manage ecosystem impacts.
			There is considered to be an operational strategy in place for managing the impact of the AAFA fishery on the ecosystem. There is also considered to be sufficient information available to support the strategy. As such, the fishery meets this scoring issue.
	References		Ayers & Lozier 2010, Childers <i>et al.</i> 2011, Kitchell <i>et al.</i> 1999, Laurs & Lynn 1991, Miller <i>et al.</i> 1999, PFMC 2010, PFMC 2011a, PFMC 2011c.
OVERALL PERFORMANCE INDICATOR SCORE:			100
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 3.1.1

PI 3.1.1		The management system exists within an appropriate legal and/or customary framework which ensures that it:	
PI 3.1.1		<ul style="list-style-type: none"> • Is capable of delivering sustainable fisheries in accordance with MSC Principles 1 and 2; • Observes the legal rights created explicitly or established by custom of people dependent on fishing for food or livelihood; and • Incorporates an appropriate dispute resolution framework. 	
SG	Issue	Met? (Y/N)	Justification/Rationale
60	a	Y	<p>The management system is generally consistent with local, national or international laws or standards that are aimed at achieving sustainable fisheries in accordance with MSC Principles 1 and 2.</p> <p>International management of the North Pacific albacore resource and fisheries operating on the resource is shared by the IATTC and the WCPTC RFMOs. The Conventions of the IATTC and WCPFC incorporate the relevant principles of international law related to the conservation and management of living marine resources in accordance with MSC Principles 1 and 2.</p> <p>Domestic management of the US North Pacific albacore fishery is by the Pacific Fishery Management Council (PFMC), established by the Magnuson-Stevens Fishery Conservation and Management Act (MSA) for domestic management of US regional fisheries. Standards set forth in MSA and amendments, as well as US policies and other laws, e.g., NEPA, ESA, MMPA, and others etc., incorporate the relevant principles related to the conservation and management of living marine resources in accordance with MSC Principles 1 and 2.</p>
	b	Y	<p>The management system incorporates or is subject by law to a mechanism for the resolution of legal disputes arising within the system.</p> <p>At the international level, the Conventions of the respective RFMOs establish mechanisms for resolution of legal disputes arising within the system, e.g., WCPFC <i>Convention Annex II</i> establishes authority to set up a Review Panel to review decisions made by the Commission to settle disputes among members of the Commission, and the IATTC <i>Antigua Convention Part VII Article 25</i> addresses the settlement of disputes.</p> <p>At the domestic level, the MSA and amendments and other FMC bylaws provide measures for resolution of legal disputes.</p>
	c	Y	<p>Although the management authority or fishery may be subject to continuing court challenges, it is not indicating a disrespect or defiance of the law by repeatedly violating the same law or regulation necessary for the sustainability of the fishery.</p> <p>The auditors are not aware of any legal challenges and related binding judicial decisions at the domestic or international levels regarding North Pacific albacore.</p>
	d	Y	<p>The management system has a mechanism to generally respect the legal rights created explicitly or established by custom of people dependent on fishing for food or livelihood in a manner consistent with the objectives of MSC Principles 1 and 2.</p> <p>At the international level, WCPFC <i>Convention Article 10</i> specifies that the needs of small developing States, territories, etc. whose economies, food supplies, and livelihoods are dependent of the exploitation of marine resources must be taken in to account, <i>inter alia</i> and <i>Article 30</i> recognises the special requirements of developing states. IATTC provides a framework for working with developing countries through training and building technical capacity and cooperation.</p> <p>At the domestic level the PFMC is mandated to observe the legal rights and customs of peoples dependent on fishing for food or livelihood. The laws and rights affecting the US North Pacific fishery and fishers are clearly defined through the MSA, amendments to the MSA and other relevant Acts, and through case law</p>

PI 3.1.1		<p>The management system exists within an appropriate legal and/or customary framework which ensures that it:</p> <ul style="list-style-type: none"> • Is capable of delivering sustainable fisheries in accordance with MSC Principles 1 and 2; • Observes the legal rights created explicitly or established by custom of people dependent on fishing for food or livelihood; and • Incorporates an appropriate dispute resolution framework. 	
SG	Issue	Met? (Y/N)	Justification/Rationale
			developed through litigation.
80	b	Y	<p>The management system incorporates or is subject by law to a transparent mechanism for the resolution of legal disputes which is considered to be effective in dealing with most issues and that is appropriate to the context of the fishery.</p> <p>At the international level, the <i>Antigua Convention (Article XXVI)</i> and <i>WCPFC Convention (Article XXI)</i> specify that the IATTC and the WCPFC, respectively, shall promote transparency in the implementation of their respective <i>Conventions</i> in decision making procedures and other activities. In both the mechanisms are considered effective in dealing with most issues and are appropriate in the context of the US North Pacific albacore fishery.</p> <p>At the domestic level, the PFMC is mandated by law to conduct legal disputes in a transparent manner. The US North Pacific albacore fishery has not be subject to legal dispute, however, experiences involving several other fisheries has demonstrated the mechanisms to be effective.</p>
	c	Y	<p>The management system or fishery is attempting to comply in a timely fashion within binding judicial decisions arising from any legal challenges.</p> <p>The auditors are not aware of any legal challenges and related binding judicial decisions at the domestic or international levels regarding North Pacific albacore.</p>
	d	Y	<p>The management system has a mechanism to observe the legal rights created explicitly or established by custom of people dependent on fishing for food or livelihood in a manner consistent with the objectives of MSC Principles 1 and 2.</p> <p>Both the international and domestic systems for management have mechanisms to observe the legal rights created explicitly or established by custom of people dependent on fishing for food or livelihood in a manner consistent with the objectives of MSC Principles 1 and 2.</p> <p>At the international level WCPFC <i>Convention Article X</i> specifies the needs of small developing States, territories, etc. whose economies, food supplies, and livelihoods are dependent of the exploitation of marine resources must be taken in to account, <i>inter alia</i>, in developing criteria for allocation of TACs or total level of fishing effort or other management actions; <i>Article XXX</i> recognises the special requirements of developing states. The IATTC <i>Antigua Convention Part VI Article XXIII</i> provides specifies that Commission shall seek to adopt measures to assist developing countries fulfil their obligations under the <i>Convention</i> and enhance their ability to develop fisheries under their respective national jurisdictions and to participate in high seas fisheries on a sustainable basis.</p> <p>At the domestic level, the PFMC is mandated by the MSA that conservation and management measures shall take into account the importance of fishery resources to fishing communities to provide for the sustained participation of, and minimize adverse impacts to such communities, consistent with conservation requirements.</p>
100	b	N	<p>The management system incorporates or subject by law to a transparent mechanism for the resolution of legal disputes that is appropriate to the context of the fishery and has been tested and proven to be effective.</p>

PI 3.1.1		<p>The management system exists within an appropriate legal and/or customary framework which ensures that it:</p> <ul style="list-style-type: none"> • Is capable of delivering sustainable fisheries in accordance with MSC Principles 1 and 2; • Observes the legal rights created explicitly or established by custom of people dependent on fishing for food or livelihood; and • Incorporates an appropriate dispute resolution framework. 	
SG	Issue	Met? (Y/N)	Justification/Rationale
			<p>The management system at the international level incorporates transparent mechanisms in decision making processes and other activities. IATTC <i>Article XXV of Antigua Convention</i> outlines dispute settlement; WCPFC <i>Convention Annex II</i> establishes the authority to set up a Review Panel to review decisions made by the Commission to settle disputes among members of the Commission. At the domestic level US policy and law, e.g., MSA amendments, NEPA, ESA, etc., provide measures for resolution of legal disputes.</p> <p>However, the mechanism at the international level has not been tested and proven to be effective; at the domestic level the mechanism has been tested and proven effective in other fisheries. The fishery therefore doesn't fully meet this scoring issue.</p>
	c	Y	<p>The management system or fishery acts proactively to avoid legal disputes or rapidly implements binding judicial decisions arising from legal challenges.</p> <p>The auditors are not aware of any legal challenges and related binding judicial decisions at the domestic or international levels.</p>
	d	Y	<p>The management system has a mechanism to formally commit to the legal rights created explicitly or established by custom of people dependent on fishing for food and livelihood in a manner consistent with the objectives of MSC Principles 1 and 2.</p> <p>At the international level, both RFMOs observe rights created explicitly of people dependent on fishing for food or livelihood. WCPFC <i>Convention Article X</i> specifies the needs of small developing States, territories, etc. whose economies, food supplies, and livelihoods are dependent of the exploitation of marine resources must be taken in to account, inter alia, in developing criteria for allocation of TACs or total level of fishing effort or other management actions; <i>Article XXX</i> recognises the special requirements of developing states. IATTC <i>Antigua Convention Part VI Article XXIII</i> specifies that Commission shall seek to adopt measures to assist developing countries fulfil their obligations under the Convention and enhance their ability to develop fisheries under their respective national jurisdictions and to participate in high seas fisheries on a sustainable basis.</p> <p>At the domestic level, PFMC is mandated by the MSA that specifies that conservation and management measures shall take into account the importance of fishery resources to fishing communities to provide for the sustained participation of, and minimize adverse impacts to such communities, consistent with conservation requirements.</p>
References		WCPFC Convention, Antigua Convention, Magnuson-Stevens Fishery Conservation and management Act and amendments.	
OVERALL PERFORMANCE INDICATOR SCORE:			95
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 3.1.2

PI 3.1.2		The management system has effective consultation processes that are open to interested and affected parties. The roles and responsibilities of organisations and individuals who are involved in the management process are clear and understood by all relevant parties	
SG	Issue	Met? (Y/N)	Justification/Rationale
60	a	Y	<p>Organisations and individuals involved in the management process have been identified. Functions, roles and responsibilities are generally understood.</p> <ul style="list-style-type: none"> Organizations and individuals involved in the management process have been identified and their respective functions, roles and responsibilities explicitly defined and well understood for key areas of responsibility and interactions at the international level [IATTC <i>Antigua Convention Articles VI, VII, and X-XIII</i>; WCPFC <i>Convention IX-XVI, and XXIII and XIV</i>]; and at the domestic level [MSA and several amendments].
	b	Y	<p>The management system includes consultation processes that obtain relevant information from the main affected parties, including local knowledge, to inform the management system.</p> <ul style="list-style-type: none"> The management system at both the international and domestic levels includes consultation processes that provides for all interested and affected parties to be involved at the domestic level. At the international level the IATTC <i>Antigua Convention Article XVI</i> specifies that stakeholders including representatives of industry, NGOs, and representatives of member countries, and other interested bodies and individuals are included in the IATTC processes, may attend meetings, and actively participate in data collection; <i>Antigua Convention Annex 2</i> lists principles and criteria for the participation of observers at meetings of the IATTC. WCPFC <i>Convention Article XXII</i> provides that the Commission will consult, cooperate and collaborate with other relevant organizations, particularly those with related objectives and which can contribute to the attainment of the objective of the Convention. At the domestic level PFMC is mandated by the MSA to follow a transparent process for vetting domestic regulations and related actions that includes all interested stakeholders.
80	a	Y	<p>Organisations and individuals involved in the management process have been identified. Functions, roles and responsibilities are explicitly defined and well understood for key areas of responsibility and interaction.</p> <ul style="list-style-type: none"> Organizations and individuals involved in the management process have been identified and their respective functions, roles and responsibilities explicitly defined and well understood for key areas of responsibility and interactions at the international [IATTC <i>Antigua Convention Articles VI, VII, and X – XIII</i>; WCPFC <i>Convention IX-XVI, XXXIII and XXIV</i>] and at the domestic levels [MSA and several amendments].
		Y	<p>The management system includes consultation processes that regularly seek and accept relevant information, including local knowledge. The management system demonstrates consideration of the information obtained.</p> <ul style="list-style-type: none"> The management system at both the international and domestic levels includes consultation processes that regularly seek and accept information including local knowledge and demonstrate consideration of the information obtained. At the international level the IATTC <i>Antigua Convention Article XVI</i> specifies that stakeholders including representatives of industry, NGOs, and representatives of member countries, and other interested bodies and individuals are included in the IATTC processes, may attend meetings, and actively participate in data collection; <i>Antigua Convention Annex 2</i> lists principles and criteria for the participation of observers at meetings of the

PI 3.1.2		The management system has effective consultation processes that are open to interested and affected parties. The roles and responsibilities of organisations and individuals who are involved in the management process are clear and understood by all relevant parties	
SG	Issue	Met? (Y/N)	Justification/Rationale
			<p>IATTC. WCPFC <i>Convention Article XXII</i> provides that the Commission will consult, cooperate and collaborate with other relevant organizations, particularly those with related objectives and which can contribute to the attainment of the objective of the Convention.</p> <ul style="list-style-type: none"> At the domestic level PFMC is mandated by the MSA to follow a transparent process for vetting domestic regulations and related actions that includes all interested stakeholders. Agendas for all PFMC meetings are published in advanced on the web and local newspapers.
	c	Y	<p>The consultation process provides opportunity for all interested and affected parties to be involved.</p> <ul style="list-style-type: none"> The consultation process of the management systems at both the international and domestic levels provides opportunities for all interested and affected parties to be involved. At the international level the IATTC <i>Antigua Convention Article XVI</i> specifies that stakeholders including representatives of industry, NGOs, and representatives of member countries, and other interested bodies and individuals are included in the IATTC processes, may attend meetings, and actively participate in data collection; <i>Antigua Convention Annex 2</i> lists principles and criteria for the participation of observers at meetings of the IATTC. WCPFC <i>Convention Article XXII</i> provides that the Commission will consult, cooperate and collaborate with other relevant organizations, particularly those with related objectives and which can contribute to the attainment of the objective of the Convention. Subject to Commission rules and procedures, representatives from NCPs, IGOs and NGOs may participate in Commission meetings and its subsidiary bodies as observers or otherwise as appropriate; have access to pertinent information subject to Commission rules and procedures; and, are permitted to give oral presentations and distribute papers through the Secretariat. Agendas for all meetings related to consultative processes are published in advance on the respective RFMO websites and other media. At the domestic level PFMC is mandated by the MSA to follow a transparent process for vetting domestic regulations and related actions that includes all interested stakeholders. Agendas for all PFMC meetings related to consultative processes are published in advanced on the PFMC website and other media.
100	a	Y	<p>Organisations and individuals involved in the management process have been identified. Functions, roles and responsibilities are explicitly defined and well understood for key areas of responsibility and interaction.</p> <ul style="list-style-type: none"> At the international level the organizations and individuals involved in the management process have been identified and their respective functions, roles and responsibilities explicitly defined and well understood for key areas of responsibility and interactions by the respective <i>Conventions</i> of the RFMOs: IATTC <i>Antigua Convention Articles VI, VII, and X-XIII</i>; WCPFC <i>Convention Articles IX-XVI and XXIII-XXIV</i>. At the domestic level, the functions, roles and responsibilities of the various elements of the PFMC are explicitly defined and well understood for key areas of responsibility and interaction as mandated by the MSA and amendments to the MSA.
	b	Y	<p>The management system includes consultation processes that regularly seek and accept relevant information, including local knowledge. The management system demonstrates consideration of the information and explains how it is used or not used.</p>

PI 3.1.2		<p>The management system has effective consultation processes that are open to interested and affected parties.</p> <p>The roles and responsibilities of organisations and individuals who are involved in the management process are clear and understood by all relevant parties</p>	
SG	Issue	Met? (Y/N)	Justification/Rationale
			<ul style="list-style-type: none"> The management systems at both the international and domestic levels include consultation processes that regularly seek and accept relevant information, including local knowledge and demonstrate consideration of the information and explains how it is used or not used. At the international level the IATTC <i>Antigua Convention Article XVI</i> provides for stakeholders including representatives of industry, NGOs, and representatives of member countries, and other interested bodies and individuals to be included in the IATTC processes and attend meetings of the IATTC; stakeholders may also actively participate in data collection, but research involvement is limited as all stock assessments are carried out by secretariat staff; involvement of stakeholders is coordinated by the staff of the secretariat. <i>Antigua Convention Annex 2</i> lists principles and criteria for the participation of observers at meetings of the IATTC. <i>WCPFC Convention Article XXII</i> provides that the Commission will consult, cooperate and collaborate with other relevant organizations, particularly those with related objectives and which can contribute to the attainment of the objectives of the Convention. At the domestic level PFMC is mandated by the MSA and follows regular processes to regularly seek and accept relevant information, including local knowledge, and defines how it is or is not to be used
	c	Y	<p>The consultation process provides opportunity and encouragement for all interested and affected parties to be involved, and facilitates their effective engagement.</p> <ul style="list-style-type: none"> The management system includes consultation processes that provides for all interested and affected parties to be involved at the domestic and international levels. IATTC <i>Antigua Convention Article XVI</i> provides for stakeholders including representatives of industry, NGOs, and representatives of member countries, and other interested bodies and individuals to be included in the IATTC processes and attend meetings of the IATTC; stakeholders may also actively participate in data collection, but research involvement is limited as all stock assessments are carried out by secretariat staff; involvement of stakeholders is coordinated by the staff of the secretariat. <i>Antigua Convention Annex 2</i> lists principles and criteria for the participation of observers at meetings of the IATTC. <i>WCPFC Convention Article XXII</i> provides that the Commission will consult, cooperate and collaborate with other relevant organizations, particularly those with related objectives and which can contribute to the attainment of the objectives of the <i>Convention</i>. At the domestic level, the PFMC follows a transparent process for vetting domestic regulations and related actions that includes all interested stakeholders.
References		WCPFC Convention, Antigua Convention, Magnuson-Stevens Fishery Conservation and management Act and amendments	
OVERALL PERFORMANCE INDICATOR SCORE:			100
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 3.1.3

PI 3.1.3		The management policy has clear long-term objectives to guide decision-making that are consistent with MSC Principles and Criteria, and incorporates the precautionary approach	
SG	Issue	Met? (Y/P/N)	Justification/Rationale
60	a	Y	<p>Long-term objectives to guide decision-making, consistent with the MSC Principles and Criteria and the precautionary approach, are implicit within management policy</p> <ul style="list-style-type: none"> • Clear long-term objectives that guide decision-making at the international and domestic levels are consistent with MSC Principles and Criteria and the precautionary approach are explicit within and required by management policy at the international and domestic management levels. • IATTC: <i>Antigua Convention Article IV</i> specifies that the application of the Precautionary Approach shall apply as described in the relevant provisions of the Code of Conduct and/or the 1995 UN Fish Stocks Agreement for the conservation, management, and sustainable use of fish stocks covered by the <i>Convention</i>. • WCPFC: <i>Convention Article VI</i> specifies that the Precautionary Approach shall be followed and provides guidelines for doing so. • PFMC: Precautionary management is a guiding theme in the PFMC HMS/FMP. Also, NMFS incorporated precautionary concepts to ensure compliance with the Sustainable Fisheries Act 1996 that includes three National Standards for conservation and management of fisheries in the United States [Darcy, G.H. and G.C. Matlok 1999].
80	a	Y	<p>Clear long-term objectives that guide decision-making, consistent with MSC Principles and Criteria and the precautionary approach are explicit within management policy.</p> <ul style="list-style-type: none"> • Clear long-term objectives that guide decision-making, consistent with MSC Principles and Criteria and the precautionary approach, are explicit within and required by management policy at the international and domestic management levels. • IATTC <i>Antigua Convention Article IV</i> specifies that the application of the Precautionary Approach shall apply as described in the relevant provisions of the Code of Conduct and/or the 1995 UN Fish Stocks Agreement, for the conservation, management, and sustainable use of fish stocks covered by the <i>Convention</i>. • WCPFC <i>Convention Article VI</i> specifies that the Precautionary Approach shall be followed and provides guidelines for doing so. • PFMC: Precautionary management is a guiding theme in the PFMC HMS/FMP. Also, NMFS incorporated precautionary concepts to ensure compliance with the Sustainable Fisheries Act 1996 that includes three National Standards for conservation and management of fisheries in the United States [Darcy, G.H. and G.C. Matlok 1999].
100	a	Y	<p>Clear long-term objectives that guide decision-making, consistent with MSC Principles and Criteria and the precautionary approach, are explicit within and required by management policy.</p> <ul style="list-style-type: none"> • Clear long-term objectives that guide decision-making, consistent with MSC Principles and Criteria and the precautionary approach, are explicit within and required by management policy at the international and domestic management levels. • IATTC <i>Antigua Convention Article IV</i> specifies that the application of the Precautionary Approach shall apply as described in the relevant provisions of the Code of Conduct and/or the 1995 UN Fish Stocks Agreement, for the

PI 3.1.3		The management policy has clear long-term objectives to guide decision-making that are consistent with MSC Principles and Criteria, and incorporates the precautionary approach	
SG	Issue	Met? (Y/P/N)	Justification/Rationale
			<p>conservation, management, and sustainable use of fish stocks covered by the <i>Convention</i>.</p> <ul style="list-style-type: none"> • WCPFC <i>Convention Article VI</i> specifies that the Precautionary Approach shall be followed and provides guidelines for doing so. • PFMC: Precautionary management is a guiding theme in the PFMC HMS/FMP. Also, NMFS incorporated precautionary concepts to ensure compliance with the Sustainable Fisheries Act 1996 that includes three National Standards for conservation and management of fisheries in the United States [Darcy, G.H. and G.C. Matlock 1999].
References		WCPFC Convention, Antigua Convention Amendments, Magnuson-Stevens Fishery Conservation and management amendments, Darcy & Matlock 1999	
OVERALL PERFORMANCE INDICATOR SCORE:			100
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 3.1.4

PI 3.1.4		The management system provides economic and social incentives for sustainable fishing and does not operate with subsidies that contribute to unsustainable fishing	
SG	Issue	Met? (Y/P/N)	Justification/Rationale
60	a	Y	<p>The management system provides for incentives that are consistent with achieving the outcomes expressed by MSC Principles 1 and 2.</p> <ul style="list-style-type: none"> The management system at the international and domestic levels provide for incentives that are consistent with achieving outcomes expressed by MSC Principles 1 and 2. At the international level, fundamental duties of both RFMOs are to promote conservation, sustainability and optimal utilization of HMS fish stocks using science-based information. The IATTC and WCPFC are tasked with developing and adopting specific measures to promote these objectives, as detailed in the <i>Antigua Convention Articles</i> and <i>Convention Articles IV and VI</i>, respectively. At the domestic level the PFMC HMS/FMP details specific measures promoting sustainable fishing and the resulting stability and security for the fisheries helps to ensure that negative incentives do not arise. There are no subsidies in the US west coast albacore fishery.
80	a	Y	<p>The management system provides for incentives that are consistent with achieving the outcomes expressed by MSC Principles 1 and 2, and seeks to ensure that perverse incentives do not arise.</p> <ul style="list-style-type: none"> The management system at the international and domestic levels provide for incentives that are consistent with achieving outcomes expressed by MSC Principles 1 and 2. Fundamental duties of both RFMOs to promote conservation, sustainability and optimal utilization of HMS fish stocks are supported by science-based information. The IATTC and WCPFC are tasked with developing and adopting specific measures to promote these objectives, as detailed in the <i>Antigua Convention Articles</i> and <i>Convention Articles IV and VI</i>, respectively. At the domestic level the PFMC HMS FMP details similar specific measures. Sustainable fishing is promoted and the resulting stability and security for the fisheries helps to ensure that negative incentives do not arise. There are no subsidies in the US west coast North Pacific albacore fishery.
100	a	Y	<p>The management system provides for incentives that are consistent with achieving the outcomes expressed by MSC Principles 1 and 2, and explicitly considers incentives in a regular review of management policy or procedures to ensure they not contribute to unsustainable fishing practices.</p> <ul style="list-style-type: none"> The management system at both the international and domestic levels provides for incentives that are consistent with achieving the outcomes expressed by MSC Principles 1 and 2 and ensures that management policies do not contribute to unsustainable fishing practices. At the international level Scientific Committees established by the Conventions of each RFMO have duties which include reviews as needed of management policies to ensure that stocks managed by the respective RFMO are being managed using science-based information in a manner that promotes conservation, sustainability and optimal utilization. At the domestic level the PFMC HMS FMP Safe Report provides a regular review that explicitly considers incentives of the management policy to ensure that they do not contribute to unsustainable fishing practices.
References			WCPFC Convention; Antigua Convention; Magnuson-Stevens Fishery Conservation and management Act and amendments; PFMC HMS/FMP



PI 3.1.4		The management system provides economic and social incentives for sustainable fishing and does not operate with subsidies that contribute to unsustainable fishing	
SG	Issue	Met? (Y/P/ N)	Justification/Rationale
OVERALL PERFORMANCE INDICATOR SCORE:		100	
CONDITION NUMBER (if relevant):		N/A	

Evaluation Table: PI 3.2.1

PI 3.2.1		The fishery has clear, specific objectives designed to achieve the outcomes expressed by MSC's Principles 1 and 2	
SG	Issue	Met? (Y/P/N)	Justification/Rationale
60	a	Y	<p>Objectives, which are broadly consistent with achieving the outcomes expressed by MSC's Principles 1 and 2, are implicit within the fishery's management system.</p> <ul style="list-style-type: none"> The fishery exceeds this level of performance.
			<p>Short and long-term objectives, which are consistent with achieving the outcomes expressed by MSC's Principles 1 and 2, are explicit within the fishery's management system.</p> <ul style="list-style-type: none"> The fishery exceeds this level of performance.
100	a	Y	<p>Well defined and measurable short and long-term objectives, which are demonstrably consistent with achieving the outcomes expressed by MSC's Principles 1 and 2, are explicit within the fishery's management system.</p> <ul style="list-style-type: none"> The fishery management systems have clear, specific objectives designed to achieve the outcomes expressed by MSC Principles 1 and 2 both at the international and domestic levels. At the international level the IATTC and WCPFC have clear, well-defined fishery management objectives, specified in their respective conventions, which promote outcomes expressed by Principles 1 and 2. The IATTC's <i>Antigua Convention</i> entered into force on August 27, 2010 replaces the original convention signed in 1949 and substantially improves the regulatory framework that governs IATTC and updates the legal framework in accordance with UNCLOS, Agenda 21 and Rio Declaration, the FAO Compliance Agreement, the Code of Conduct and the UNFSA. . It introduces the concepts of the Precautionary Approach in <i>Article IV</i> of the <i>Antigua Convention</i>, the Ecosystem Approach to Fisheries Management envisaged in <i>Articles II and VII</i> of the <i>Antigua Convention</i>, and compatibility of management measures between high seas and Exclusive Economic Zones in <i>Article V</i> of the <i>Antigua Convention</i>. IATTC management actions have included ecosystem effects of fishing; protecting biodiversity and promoting ecosystem based approaches to management; and minimizing waste, pollution and impacts on both target and non-target or associated or dependent species. The WCPFC Convention has similar explicit statements. At the domestic level the PFMC HMS/FMP includes explicit, well defined short and long-term objectives which are consistent with achieving the outcomes express by MSC Principles 1 and 2.
			<p>References</p> <p>WCPFC Convention, Antigua Convention, Magnuson-Stevens Fishery Conservation and Management Act and amendments, PFMC HMS FMP, AAFA website: www.americanalbacore.com</p>
OVERALL PERFORMANCE INDICATOR SCORE:			100
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 3.2.2

PI 3.2.2		The fishery-specific management system includes effective decision-making processes that result in measures and strategies to achieve the objectives	
SG	Issue	Met? (Y/N)	Justification/Rationale
60	a	Y	<p>There are some decision-making processes in place that result in measures and strategies to achieve the fishery-specific objectives.</p> <ul style="list-style-type: none"> The fishery exceeds this level of performance.
	b	Y	<p>Decision-making processes respond to serious issues identified in relevant research, monitoring, evaluation and consultation, in a transparent, timely and adaptive manner and take some account of the wider implications of decisions.</p> <ul style="list-style-type: none"> The fishery exceeds this level of performance.
80	a	Y	<p>There are established decision-making processes that result in measures and strategies to achieve the fishery-specific objectives.</p> <ul style="list-style-type: none"> There are established decision-making processes at the international and domestic levels that result in measures and strategies to achieve the fishery-specific objectives. At the international level the Conventions of both RFMOs require that decision-making to be by consensus, with few exceptions, which are well-defined and explained, IATTC <i>Antigua Convention Article IX</i> and WCPFC <i>Convention Article XX</i>, respectively. At the domestic level, PFMC management decision-making processes are clearly outlined in the MSA and amendments and HMS/FMP.
	b	Y	<p>Decision-making processes respond to serious and other important issues identified in relevant research, monitoring, evaluation and consultation, in a transparent, timely and adaptive manner and take account of the wider implications of decisions.</p> <ul style="list-style-type: none"> Decision-making processes at both the international and domestic levels respond to serious and other important issues identified in relevant research, monitoring, evaluation and consultation, in a transparent, timely and adaptive manner and take account of the wider implications of decisions. For example, at the international level, each RFMO followed the precautionary approach and coordinated with each other in placing caps on the fishing capacity of Members, Cooperating Non-members, and Participating Territories whose fishing vessels harvest North Pacific albacore in their respective Convention Areas (IATTC <i>C-05-02</i> and WCPFC <i>CMM 2005-3</i>). Although the RFMOs operate by consensus, these actions were taken in a timely manner in response to findings and recommendations made by the ISC ALBWG (ref) using best available scientific information. At the domestic level, the PFMC undertook necessary actions in response to the measures taken by the RFMOs, for US vessels operating in the west coast North Pacific albacore fishery to comply with the RFMO regulations.
	c	Y	<p>Decision-making processes use the precautionary approach and are based on best available information.</p> <ul style="list-style-type: none"> The precautionary approach and use of best scientific evidence available are used in decision-making processes at the international level as specified for IATTC by <i>Antigua Convention Article IV</i> and <i>Article VII</i>, respectively; and for WCPFC by <i>Convention Articles V(c)</i> and <i>VI</i> and <i>V(b)</i>, respectively. The precautionary approach and use of best scientific information available are used in decision-making processes at the domestic level by PFMC as mandated by MSA amendments, US policy, etc., and by the HMS/FMP.

PI 3.2.2		The fishery-specific management system includes effective decision-making processes that result in measures and strategies to achieve the objectives	
SG	Issue	Met? (Y/N)	Justification/Rationale
	d	Y	<p>Explanations are provided for any actions or lack of action associated with findings and relevant recommendations emerging from research, monitoring, evaluation and review activity.</p> <ul style="list-style-type: none"> Explanations are provided for any actions or lack of action associated with findings and relevant recommendations emerging from research, monitoring, evaluation and review activity. Both RFMOs and the PFMC maintain publicly assessable websites where meeting minutes, reports, and scientific reports are posted and are freely available for download.
100	b	N	<p>Decision-making processes respond to all issues identified in relevant research, monitoring, evaluation and consultation, in a transparent, timely and adaptive manner and take account of the wider implications of decisions.</p> <ul style="list-style-type: none"> There are established decision-making processes at the international and domestic levels for responding to important issues. However, not all issues identified in relevant research, monitoring, evaluation and consultation are addressed in a transparent, timely and adaptive manner and take account of the wider implications of decisions, and so the fishery does not meet this level of performance.
	d	Y	<p>Formal reporting to all interested stakeholders describes how the management system responded to findings and relevant recommendations emerging from research, monitoring, evaluation and review activity.</p> <ul style="list-style-type: none"> Formal reporting to all interested stakeholders describes how the management systems at both the international and domestic levels responded to findings and relevant communications emerging from research, monitoring, evaluation, and review activity. Both RFMOs and the PFMC maintain publicly assessable websites where meeting minutes, reports, and scientific reports are posted and are freely available for download.
References		WCPFC Convention, Antigua Convention, IATTC C-05-02, WCPFC CMM 2005-3, Magnuson-Stevens Fishery Conservation and management Act and amendments, PFMC HMS/FMP	
OVERALL PERFORMANCE INDICATOR SCORE:			90
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 3.2.3

PI 3.2.3		Monitoring, control and surveillance mechanisms ensure the fishery's management measures are enforced and complied with	
SG	Issue	Met? (Y/N)	Justification/Rationale
Article 60	a	Y	<p>Monitoring, control and surveillance <u>mechanisms</u> exist are implemented in the fishery under assessment and there is a reasonable expectation that they are effective.</p> <ul style="list-style-type: none"> The fishery exceeds this level of performance.
	b	Y	<p>Sanctions to deal with non-compliance exist and there is some evidence that they are applied.</p> <ul style="list-style-type: none"> The fishery exceeds this level of performance.
	c	Y	<p>Fishers are generally thought to comply with the management system for the fishery under assessment, including, when required, providing information of importance to the effective management of the fishery.</p> <ul style="list-style-type: none"> The fishery exceeds this level of performance.
80	a	Y	<p>A monitoring, control and surveillance system has been implemented in the fishery under assessment and has demonstrated an ability to enforce relevant management measures, strategies and/or rules.</p> <ul style="list-style-type: none"> Monitoring, control and surveillance mechanisms exist and are implemented in the fishery at the international and domestic levels under assessment and there is a reasonable expectation that they are effective. At the international level, the IATTC <i>Antigua Convention Article XVIII</i> specifies implementation, compliance and enforcement by parties, the WG on Compliance reviews compliance of vessels and reports issues identified to the Commission, and the Committee for Review of Implementation of Measures adopted by the Commission reviews monitors compliance with conservation and management measures. WCPFC <i>Convention Article XXV</i> establishes that each member of the Commission shall enforce the provisions of the Convention and any conservation and management measures issued by the Commission, <i>Article XXVI</i> establishes boarding and inspection procedures, <i>Article XXVII</i> establishes port-state inspection procedures which allows the port-state to prohibit landings and transshipment of catch and transshipment of catch taken through non-compliance, and <i>Article XXIX</i> outlines procedures for in-port and at-sea transshipment. Members of the WCPFC shall not grant a vessel authorization to fish if it is on the respective Convention's IUU vessel list. However, enforcement capabilities at the international levels are limited and the area of responsibility is huge. At the domestic level, compliance with US regulations and violations of these are regularly monitored through the NOAA Fisheries Enforcement Office, US Coast Guard, and NOAA General Council Office, and in some cases by the Department of Justice. Compliance includes marine safety requirements, as well as fishery regulation, and enforcement is supported by training programs.
	b	Y	<p>Sanctions to deal with non-compliance exist, are consistently applied and thought to provide effective deterrence.</p> <ul style="list-style-type: none"> Sanctions to deal with non-compliance exist, are consistently applied and are believed to provide effective deterrence. This is especially the case at the domestic level. Actions available include a comprehensive scale of warnings; fines; forfeiture of catch, permits, and vessels; and incarceration.
	c	Y	<p>Some evidence exists to demonstrate fishers comply with the management system under assessment, including, when required, providing information of importance to</p>

PI 3.2.3		Monitoring, control and surveillance mechanisms ensure the fishery's management measures are enforced and complied with	
SG	Issue	Met? (Y/N)	Justification/Rationale
			<p>the effective management of the fishery.</p> <ul style="list-style-type: none"> Evidence exists to demonstrate that US North Pacific albacore fishers comply with the management system under assessment, including, when required, providing information of importance to the effective management of the fishery. There is ample evidence that US albacore troll and jig fishers comply with the management system, including fishers providing information of importance to the effective management of the fishery, e.g., daily logbook records, participation in conventional and electronic tagging programs, participation in collection of various data projects. Compliance reports are routinely prepared by the NOAA Fisheries Enforcement and NOAA General Council Offices and US Coast Guard and presented to the PFMC meetings.
	d	Y	<p>There is no evidence of systematic non-compliance.</p> <p>There is no evidence of systematic non-compliance by the US North Pacific albacore troll and jig fishery.</p>
100	a	N	<p>A comprehensive monitoring, control and surveillance system has been implemented in the fishery under assessment and has demonstrated a consistent ability to enforce relevant management measures, strategies and/or rules.</p> <ul style="list-style-type: none"> Comprehensive monitoring, control and surveillance mechanisms exist and are implemented in the fishery at the levels under assessment and there is a reasonable expectation that they are effective. However, monitoring is not comprehensive at the international level. As such, the fishery cannot meet this level of performance. At the international level, IATTC <i>Antigua Convention Article XVIII</i> specifies implementation, compliance and enforcement by parties, the WG on Compliance reviews compliance of vessels and reports issues identified to the Commission, and the Committee for Review of Implementation of Measures adopted by the Commission reviews monitors compliance with conservation and management measures. WCPFC <i>Convention Article XXV</i> establishes that each member of the Commission shall enforce the provisions of the Convention and any conservation and management measures issued by the Commission, <i>Article XXVI</i> establishes boarding and inspection procedures, <i>Article XXVII</i> establishes port-state inspection procedures which allows the port-state to prohibit landings and transshipment of catch and transshipment of catch taken through non-compliance, and <i>Article XXIX</i> outlines procedures for in-port and at-sea transshipment. Members of both RFMOs shall not grant a vessel authorization to fish if it is on the respective Convention's IUU vessel list. At the domestic level, compliance with US regulations and violations of these are regularly monitored through the NOAA Fisheries Enforcement Office, US Coast Guard, and NOAA General Council Office, and in some cases by the Department of Justice. Compliance includes marine safety requirements, as well as fishery regulation, and enforcement is supported by training programs.
	b	N	<p>Sanctions to deal with non-compliance exist, are consistently applied and demonstrably provide effective deterrence.</p> <ul style="list-style-type: none"> Sanctions to deal with non-compliance exist, are consistently applied and demonstratively provide effective deterrence. This is especially the case at the domestic level. Actions available include a comprehensive scale of warnings; fines; forfeiture of catch, permits, and vessels; and incarceration. Sanctions exist at the international level, however, due to the huge geographic area of the

PI 3.2.3		Monitoring, control and surveillance mechanisms ensure the fishery's management measures are enforced and complied with	
SG	Issue	Met? (Y/N)	Justification/Rationale
			fisheries surveillance it is difficult to conclude that they demonstrably provide effective deterrence. As such, the fishery does not meet this level of performance.
	c	Y	<p>There is a high degree of confidence that fishers comply with the management system under assessment, including, providing information of importance to the effective management of the fishery.</p> <ul style="list-style-type: none"> There is a high degree of confidence that fishers comply with the management system under assessment, including providing information of importance to the effective management of the fishery. Also, there is ample evidence that US albacore pole and troll fishers comply with the management system, including fishers providing information of importance to the effective management of the fishery, e.g., daily logbook records, participation in conventional and electronic tagging programs, participation in collection of various data projects. In addition, excellent record exists of the fishers providing reports of IUU fishing activities and gillnet-marked fish to US Coast Guard, NMFS enforcement officers, and other authorities.
References		WCPFC Convention, Antigua Convention, HMS FMP and Compliance Guide posted on the NMFS SWR website at: http://swr.nmfs.noaa.gov	
OVERALL PERFORMANCE INDICATOR SCORE:			90
CONDITION NUMBER (if relevant):			N/A

Evaluation Table: PI 3.2.4

PI 3.2.4		The fishery has a research plan that addresses the information needs of management	
SG	Issue	Met? (Y/N)	Justification/Rationale
60	a	Y	<p>Research is undertaken, as required, to achieve the objectives consistent with MSC's Principles 1 and 2.</p> <ul style="list-style-type: none"> The fishery exceeds this level of performance.
	b	Y	<p>Research results are available to interested parties.</p> <ul style="list-style-type: none"> At both the international and domestic levels research results are readily available to interested parties. All research results are presented at meetings of the respective organization and/or sub-group and are posted on freely available websites available for download.
80	a	Y	<p>A research plan provides the management system with a strategic approach to Prior t research and reliable and timely information sufficient to achieve the objectives consistent with MSC's Principles 1 and 2.</p> <ul style="list-style-type: none"> Research is undertaken to achieve the objectives consistent with MSC Principles 1 and 2 at the international and domestic levels. At the international level, the IATTC scientific activities are planned and prioritised by the Director and conducted mostly by the permanent scientific staff, with review provided by the Scientific Advisory Committee as established by <i>Antigua Convention Annex IV</i>. WCPFC strategic planning for albacore research is the responsibility of the ISC ALBWG which reports to the Northern Committee of the WCPTC. To support robust science within the ISC there is additional review by the Scientific Committee and external peer review (WCPFC-NC6/WP-05). The IATTC collaborates with the ISC on research, stock assessment, and other related activities related to North Pacific albacore and other species in the northern area. Strategic planning for domestic albacore research is guided by the program planning by the ISC ALBWG; US scientists are members of the ALBWG and play key leadership roles. The HMS/Advisory Committee and HMS/Management Team are involved in identifying and developing research projects in support of domestic management of the North Pacific resource by the PFMC; the PFMC/Science and Statistical Committee play a review role.
	b	Y	<p>Research results are disseminated to all interested parties in a timely fashion.</p> <ul style="list-style-type: none"> The fishery exceeds this level of performance.
100	a	N	<p>A comprehensive research plan provides the management system with a coherent and strategic approach to research across P1, P2 and P3, and reliable and timely information sufficient to achieve the objectives consistent with MSC's Principles 1 and 2.</p> <ul style="list-style-type: none"> The research plan is not fully comprehensive, and so the fishery cannot meet this level of performance.
	b	Y	<p>Research plan and results are disseminated to all interested parties in a timely fashion and are widely and publicly available.</p> <ul style="list-style-type: none"> Research plan and results are disseminated to all interested parties in a timely fashion and are widely and publicly available. Research results are disseminated to all interested parties in a timely fashion at the international and domestic levels of the management system. All research results and related topics are posted on the respective RFMO and the PMFC websites, and are widely and



		publicly available for download. Many of the research results are also published in peer reviewed scientific journals and as government reports.
References	WCPFC-NC6/WP-05	
OVERALL PERFORMANCE INDICATOR SCORE:		90
CONDITION NUMBER (if relevant):		N/A

Evaluation Table: PI 3.2.5

PI 3.2.5		There is a system of monitoring and evaluating the performance of the fishery-specific management system against its objectives There is effective and timely review of the fishery-specific management system	
SG	Issue	Met? (Y/N)	Justification/Rationale
60	a	Y	<p>The fishery has in place mechanisms to evaluate some parts of the management system.</p> <ul style="list-style-type: none"> The fishery exceeds this level of performance.
	b	Y	<p>The fishery-specific management system is subject to occasional internal review.</p> <ul style="list-style-type: none"> The fishery exceeds this level of performance.
80	a	Y	<p>The fishery has in place mechanisms to evaluate key parts of the management system</p> <ul style="list-style-type: none"> The fishery has in place mechanisms to evaluate key parts of the management system at the international and domestic levels. At the international level this evaluation may occur at numerous points in both RFMOs. For the WCPFC this includes 1) Scientific Committee with representatives of the Oceanic Fisheries Program of the Pacific Community, the IATTC, and frequently other scientific experts; 2) the Technical and Compliance Committee; 3) ISC Albacore Working Group and Northern Committee; 3) testimony received from stakeholders at WCPFC meetings. For the IATTC this includes 1) Scientific Advisory Committee; 2) Committee for the Review of Implementation of Measures; 3) external scientific experts as needed; 4) testimony received from stakeholders at IATTC meetings. At the domestic level this includes several PFMC committees: 1) SSC; 2) HMS/Management Team; 3) HMS/Advisory Subpanel; 4) NMFS albacore fisheries scientists on ISC Albacore Working Group; 5) testimony received from stakeholders at PMFC meetings.
	b	Y	<p>The fishery-specific management system is subject to regular internal and occasional external review.</p> <ul style="list-style-type: none"> The fishery-specific management system is subject to regular internal and occasional external review at the international and domestic levels. At the international level, the scientific system supporting the management is subject to numerous internal and external reviews including, but not limited to: 1) those by the Scientific Committee established by WCPFC <i>Convention Article XII</i> with representatives of the Oceanic Fisheries Program of the Pacific Community, the IATTC, and frequently other scientific experts to review stock assessments, status of target, non-target and associated stocks, and scientific information and advice that may be provided by the Commission; 2) the Technical and Compliance Committee established by <i>Convention Article XIV</i> provides the Commission with information, technical advice, and recommendations related to the implementation and compliance with Conservation and Management Measures (CMMs); 3) <i>Convention Article XIII</i> provides for the Commission to engage external scientific experts to carry out periodic peer reviews of scientific information and advice provided by the Commission; 4) Members transmit to the Commission an annual statement of compliance measures, including imposition of sanctions it has taken for any violations; 5) the business and meetings of the WCPFC are transparent and conducted annually and as a consequence, the status of conservation and management objectives are the subject of review of public opinion and subsequent political ramifications; and 6) scientific advice and review specific to North Pacific albacore are provided by the ISC to the Northern Committee. The IATTC also has numerous internal and occasional external reviews

			<p>including, but not limited to: 1) comprehensive review functions and responsibilities of the Scientific Advisory Committee (established under <i>Antigua Convention Article XI</i>) are set forth in <i>Annex 4</i> of the <i>Antigua Convention</i>; 2) review functions and responsibilities of the Committee for the Review of Implementation of Measures (established under <i>Antigua Convention Article XVIII</i>) are set forth in <i>Annex 3</i> of the <i>Antigua Convention</i>; 3) the Commission may engage external scientific experts to carry out periodic peer reviews of scientific information and advice provided by the Commission may; and 4) the business and meetings of the IATTC are transparent and conducted annually and as a consequence, the status of conservation and management objectives are the subject of review of public opinion and subsequent political ramifications.</p> <ul style="list-style-type: none"> At the domestic level, the scientific system supporting management by the PFMC is also subject to numerous internal and external reviews including, but not limited to: 1) those conducted by the SSC; 2) the HMS/FMP SAFE report provided for initial and final decision making on the need for new harvest specifications and management measures; 3) peer review by outside experts of specific management actions and particularly controversial issues; 4) FMPs, including the HMS/FMP, are subject to NMFS oversight; and 5) ultimate external oversight of the Fishery Management Councils is provided by the Secretary of Commerce.
100	a	N	<p>The fishery has in place mechanisms to evaluate all parts of the management system.</p> <ul style="list-style-type: none"> The fishery has in place mechanisms to evaluate all parts of the management system, except those related to control rules and reference points, which although they have been investigated and specific recommendation made by the ISC ALBWG , have yet to be adopted by the RFMOs. The PFMC has also formally requested that the U.S. delegation push for the adoption of appropriate reference points for all managed stocks in the WCPFC by 2014. On balance, it is considered that the fishery does not meet the SG 100 level of performance for this scoring issue.
	b	N	<p>The fishery-specific management system is subject to regular internal and external review.</p> <ul style="list-style-type: none"> The fishery-specific management system is subject to regular internal review at both the international and domestic levels, and regular external review at the domestic level, but only occasional external review at the international level. Therefore, the fishery does not meet this level of performance for this scoring issue.
References			WCPFC Convention, Antigua Convention, IATTC and WCPFC MOU, IATTC stock status report, ISC science reviews, PFMC HMS/FMP, SSC science reviews for PFMC, PFMC SAFE Reports.
OVERALL PERFORMANCE INDICATOR SCORE:			80
CONDITION NUMBER (if relevant):			N/A

Appendix 2: Conditions

Table 12: Condition 1

Performance Indicator	PI 1.1.2: Limit and target reference points are appropriate for the stock
Score	70
Rationale	<p>SG60:</p> <ul style="list-style-type: none"> Generic limit and target reference points are based on justifiable and reasonable practice appropriate for the species category. <p>SG 80:</p> <ul style="list-style-type: none"> Reference points are appropriate for the stock and can be estimated. The limit reference point is set above the level at which there is an appreciable risk of impairing reproductive capacity. The target reference point is such that the stock is maintained at a level consistent with B_{MSY} or some measure or surrogate with similar intent or outcome. Key low trophic level species, the target reference point takes into account the ecological role of the stock. <p>SG100:</p> <ul style="list-style-type: none"> The limit reference point is set above the level at which there is an appreciable risk of impairing reproductive capacity following consideration of precautionary issues. The target reference point is such that the stock is maintained at a level consistent with B_{MSY} or some measure or surrogate with similar intent or outcome, or a higher level, and takes into account relevant precautionary issues such as the ecological role of the stock with a high degree of certainty. <p>A variety of reference points have been considered for the North Pacific albacore stock, and analyses show that the stock is performing well. However, the existing management benchmarks are implicit only. This means that the fishery cannot meet the SG 80 level of performance, although the fishery scores 70 for this Performance Indicator.</p>
Condition	By the end of the fourth year of certification, the SG 80 scoring requirements above must be met in full. This will be achieved if the limit reference point is set above the level at which there is an appreciable risk of impairing reproductive capacity, and if the target reference point is such that the stock is maintained at a level consistent with B_{MSY} or some measure or surrogate with similar intent or outcome.
Milestones	<p>Year 1:</p> <ul style="list-style-type: none"> In conjunction with Condition 2, evidence should be provided that AAFA is working actively through the PFMC and US RFMO Delegations to promote the adoption by the relevant RFMOS of appropriate target and limit reference points (or measures/surrogates with similar intent) for North Pacific albacore tuna.

	<p>Year 2:</p> <ul style="list-style-type: none"> In conjunction with Condition 2, evidence should be provided of AAFA's continued promotion through the PFMC and US RFMO Delegations of the adoption by the relevant RFMOs of appropriate target and limit reference points (or measures/surrogates with similar intent) for North Pacific albacore tuna. <p>Year 3:</p> <ul style="list-style-type: none"> Evidence of consideration by the relevant RFMOs of appropriate target and limit reference points (or measures/surrogates with similar intent) for North Pacific albacore tuna should be provided. <p>Year 4:</p> <ul style="list-style-type: none"> Evidence should be provided that appropriate target and limit reference points (or measures/surrogates with similar intent) for North Pacific albacore tuna are adopted by the relevant RFMOs.
<p>Client action plan</p>	<p style="text-align: center;">MSC PI 1.1.2 - Target and limit reference points</p> <ul style="list-style-type: none"> In the first year following grant of recertification, and thereafter as necessary, AAFA will work actively through the PFMC and the US delegations to the IATTC and WCPFC to promote the development and determination of appropriate target and limit reference points (or measures or surrogates with similar intent or outcome) for the North Pacific albacore tuna stock. These efforts will be aligned with AAFA's support for appropriate measures to increase compliance with conservation and management measures of the appropriate RFMOs. In the second year following grant of recertification, and thereafter as necessary, AAFA will work actively through the PFMC and the US delegations to the IATTC and WCPFC to promote the adoption of appropriate target and limit reference points (or measures or surrogates with similar intent or outcome) for the North Pacific albacore tuna stock. In the third year following grant of recertification, and thereafter as necessary, AAFA will work actively toward having the IATTC and WCPFC (or their designated bodies) expressly consider appropriate target and limit reference points (or measures or surrogates with similar intent or outcome) for the North Pacific albacore tuna stock. Evidence of the work will be provided in the form of AAFA letters to the relevant US regional managers and RFMO Delegations, and then evidence of the outcome of the RFMOs considering appropriate target and limit reference points (or measures or surrogates with similar intent or outcome) will be provided in the form of RFMO meeting papers and minutes. In the fourth year following grant of recertification, and thereafter as necessary, AAFA will work actively toward having the IATTC and WCPFC adopt appropriate target and limit reference points (or measures or surrogates with similar intent or outcome) for the North Pacific albacore tuna stock. Evidence of the work will be provided in the form of AAFA letters to the relevant US regional managers and RFMO Delegations, and then evidence of the outcome of the RFMOs adopting appropriate target and limit reference points (or measures or surrogates with similar intent or outcome) will be provided in the form of RFMO meeting papers and minutes. In accordance with these actions, AAFA will report on efforts to explore

	appropriate opportunities with other tuna fisheries, associations, or organizations with complimentary objectives.
Consultation on condition	<p>This condition requires action to be taken by a body other than AAFA, with the required outcome being that the RFMOs adopt appropriate reference points (or measures/surrogates with similar intent) for North Pacific albacore. This will come about through political and management dialogue between country representatives, rather than through a simple series of steps that can be agreed prior to certification. As such, AAFA has been and will need to continue working with relevant US regional and national managers in order to generate support for meeting the requirements of this condition. It may be noted that the IATTC and WCPFC staffs have been kept informed of AAFA's progress through the certification process, and that AAFA has been developing links in to the RFMO process for several years.</p> <p>In meeting CR requirements to show evidence that the relevant bodies have been consulted (MSC CR 27.11.3) and that funding and/or resources are in place to address Conditions (MSC CR 27.11.4), IMM is satisfied that the PFMC and US Delegations to the RFMOs are engaged in improving the management of the fishery, that the necessary research budgets are in place to address the work, and that meetings will be scheduled and held as required. Mr. Rodney R. McInnis, Regional Administrator for NMFS, has also supplied a letter of support for the AAFA Action Plan (included as Appendix 6). As such, certification can be awarded.</p>

Table 13: Condition 2

Performance Indicator	1.2.2: There are well defined and effective harvest control rules in place
Score	60
Rationale	<p>SG60:</p> <ul style="list-style-type: none"> • Generally understood harvest rules are in place that are consistent with the harvest strategy and which act to reduce the exploitation rate as limit reference points are approached. • There is some evidence that tools used to implement harvest control rules are appropriate and effective in controlling exploitation. <p>SG 80:</p> <ul style="list-style-type: none"> • Well defined harvest control rules are in place that are consistent with the harvest strategy and ensure that the exploitation rate is reduced as limit reference points are approached. • The selection of the harvest control rules takes into account the main uncertainties. • Available evidence indicates that the tools in use are appropriate and effective in achieving the exploitation levels required under the harvest control rules. <p>SG100:</p> <ul style="list-style-type: none"> • Well defined harvest control rules are in place that are consistent with the

	<p>harvest strategy and ensure that the exploitation rate is reduced as limit reference points are approached.</p> <ul style="list-style-type: none"> • The design of the harvest control rules takes into account a wide range of uncertainties. • Evidence clearly shows that the tools in use are effective in achieving the exploitation levels required under the harvest control rules. <p>There is a general understanding that a harvest control rule for North Pacific albacore tuna will be implemented when the stock approaches or falls below the MSY point, based around controlling fishing effort and capacity. However, the precise point when action will be taken and exactly what action will be taken is not defined. This means that the fishery cannot meet the SG 80 level of performance, although the fishery scores 60 for this Performance Indicator.</p>
Condition	<p>By the end of the fourth year of certification, the SG 80 scoring requirements above must be met in full. This will be achieved if well defined harvest control rules are in place that are consistent with the harvest strategy and ensure that the exploitation rate is reduced as limit reference points are approached, the selection of the harvest control rules takes into account the main uncertainties, and available evidence indicates that the tools in use are appropriate and effective in achieving the exploitation levels required under the harvest control rules.</p>
Milestones	<p>Year 1:</p> <ul style="list-style-type: none"> • In conjunction with Condition 1, evidence should be provided that AAFA is working actively through the PFMC and US RFMO Delegations to promote the adoption by the relevant RFMOs of an appropriate harvest control rule for North Pacific albacore tuna. <p>Year 2:</p> <ul style="list-style-type: none"> • In conjunction with Condition 1, evidence should be provided of AAFA's continued promotion through the PFMC and US RFMO Delegations of the adoption by the relevant RFMOs of an appropriate harvest control rule for North Pacific albacore tuna. <p>Year 3:</p> <ul style="list-style-type: none"> • Evidence of consideration by the relevant RFMOs of an appropriate harvest control rule for North Pacific albacore tuna should be provided. <p>Year 4:</p> <ul style="list-style-type: none"> • Evidence should be provided that an appropriate harvest control rule for North Pacific albacore tuna is adopted by the relevant RFMOs.
Client action plan	<p>MSC PI 1.2.2 - Well-defined and effective harvest control rules</p> <ul style="list-style-type: none"> • In the first year following grant of recertification, and thereafter as necessary, AAFA will work actively through the PFMC and the US delegations to the IATTC and WCPFC to promote the development and determination of an appropriate harvest control rule that applies uniformly and equitably to all fishery mortality of North Pacific albacore tuna stock. • In the second year following grant of recertification, and thereafter as necessary, AAFA will work actively through the PFMC and the US delegations to the IATTC and WCPFC to promote the consideration toward adoption of such an

	<p>appropriate harvest control rule for North Pacific albacore tuna stock.</p> <ul style="list-style-type: none"> • In the third year following grant of recertification, and thereafter as necessary, AAFA will work actively toward having the IATTC and WCPFC (or their designated bodies) expressly consider such an appropriate harvest control rule for North Pacific albacore tuna stock. Evidence of the work will be provided in the form of AAFA letters to the relevant US regional managers and RFMO Delegations, and then evidence of the outcome of the RFMOs considering an appropriate harvest control rule will be provided in the form of RFMO meeting papers and minutes. • In the fourth year following grant of recertification, and thereafter as necessary, AAFA will work actively toward having the IATTC and WCPFC adopt such an appropriate harvest control rule for North Pacific albacore tuna stock. Evidence of the work will be provided in the form of AAFA letters to the relevant US regional managers and RFMO Delegations, and then evidence of the outcome of the RFMOs adopting an appropriate harvest control rule will be provided in the form of RFMO meeting papers and minutes. • In accordance with these actions, AAFA will report on efforts to explore appropriate opportunities with other tuna fisheries, associations, or organizations with complimentary objectives.
<p>Consultation on condition</p>	<p>This condition requires action to be taken by a body other than AAFA, with the required outcome being that the RFMOs adopt appropriate harvest control rules for North Pacific albacore. This will come about through political and management dialogue between country representatives rather than through a simple series of steps that can be agreed prior to certification. As such, AAFA has been and will need to continue working actively with relevant US regional and national managers in order to generate support for meeting the requirements of this condition. It may be noted that the IATTC and WCPFC staffs have been kept informed of AAFA's progress through the certification process, and that AAFA has been developing links in to the RFMO process for several years.</p> <p>In meeting CR requirements to show evidence that the relevant bodies have been consulted (MSC CR 27.11.3) and that funding and/or resources are in place to address Conditions (MSC CR 27.11.4), IMM is satisfied that the PFMC and US Delegations to the RFMOs are engaged in improving the management of the fishery, that the necessary research budgets are in place to address the work, and that meetings will be scheduled and held as required. Mr. Rodney R. McInnis, Regional Administrator for NMFS, has also supplied a letter of support for the AAFA Action Plan (included as Appendix 6). As such, certification can be awarded.</p>



Appendix 3: Assessment advertisement placed in the San Diego Daily Tribune

CERTIFICATE OF PUBLICATION

Rob Blyth-Skyrme
Ichthy Marine Ecological Consulting Incorporated
328 Dalene Way, #1
HONOLULU HI 96821

IN THE MATTER OF Marine Stewardship Council

CASE NO.



Marine Stewardship Council
Certification
American Albacore Fishing
Association (AAFA) North Pacific
Albacore Pole & Line and Troll/Jig
Fishery, and South Pacific Albacore
Troll Fishery.

Intertek Moody Marine Ltd are currently undertaking an assessment of the above fisheries against the Marine Stewardship Council's Principles and Criteria for Sustainable Fishing. We would welcome the views of interested parties on the suitability of these fisheries for certification. Please forward any comments to: Dr. Rob Blyth-Skyrme, Intertek Moody Marine Ltd. Tel: +1 808 351 0050, E-mail: rob@ichthysmarine.com. Please note that a template for stakeholder input has been provided by the Marine Stewardship Council, and is available at: <http://www.msc.org/documents/get-certified/stakeholders>
Pub. Sept. 26, 27, 28-00091440

I, Marcela Aguayo, am a citizen of the United States and a resident of the county aforesaid; I am over the age of eighteen years, and not party to or interested in the above entitled matter. I am the principal clerk of the San Diego Daily Transcript, a newspaper of general circulation, printed and published daily, except on Saturdays and Sundays, in the City of San Diego, County of San Diego and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of San Diego, State of California, under the date of January 23, 1909, Decree No. 14894; and the

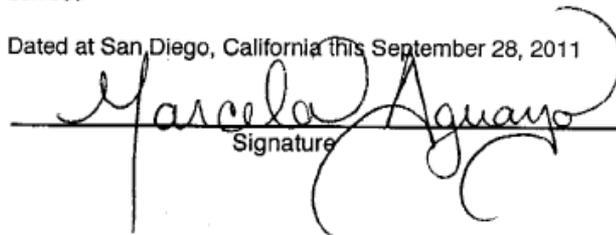
Public Notice

is a true and correct copy of which the annexed is a printed copy and was published in said newspaper on the following date(s), to wit:

September 26, 27, 28

I certify under penalty of perjury that the forgoing is true and correct.

Dated at San Diego, California this September 28, 2011


Signature



Appendix 4: Assessment advertisement placed on the MSC website

American Albacore Fishing Association North Pacific Albacore Pole & Line and Troll/Jig Fishery

MSC Certification: 4th Surveillance Audit MSC Certification: Re-Assessment

Certification Body: Intertek Moody Marine

Site Visit

This fishery is now entering the 'information gathering' stage of the 4th surveillance audit and reassessment against the MSC *Principles and Criteria for Sustainable Fishing*. A key purpose of this stage is to collect information on the fishery and speak to stakeholders with an interest in the fishery under audit and assessment. The assessment team will therefore convene in San Diego over the period 26th – 28th October 2011, when we aim to hold face-to-face meetings with stakeholders, or to arrange conference telephone/skype calls if preferred.

Stakeholders who previously submitted comments on this fishery have been contacted directly, but MSC procedure allows stakeholders 30 days notice of a site visit and 5 days for MSC to post the notice on the MSC website. The 26th – 28th October 2011 is within 30 days of this notification, and so alternative dates for stakeholders to speak with the assessment team could be arranged for the 23rd – 24th November 2011. Again, and for the convenience of all parties, stakeholders can also make their submissions to the assessment team via email or telephone/skype calls.

If you have any information on this fishery that you feel should be considered in the assessment, please advise us of:

- a) your name and contact details
- b) your association with the fishery
- c) the issues you would like to discuss (in order for us to arrange appropriate representation)
- d) when you would like to meet

We will then be in touch.

Should you wish to obtain further information on the Marine Stewardship Council, this is available on their web site at <http://www.msc.org>. The MSC has also produced a template for stakeholder input, which is available from their web site here: <http://www.msc.org/documents/scheme-documents/forms-and-templates/msc-template-for-stakeholder-input-into-fishery-assessments/view>. The assessment team will, though, consider all points, however they are raised.

As a certification body, Intertek Moody Marine has dispute resolution procedures available should these prove necessary.

Yours,

Dr. Rob Blyth-Skyrme
Lead Assessor
E-mail: rob@ichthysmarine.com
Tel: +1 808 351 0050

Intertek Moody Marine
Merlin House
Stanier Way
The Wyvern Business Park
Derby. DE21 6BF

Appendix 5: Harmonisation check against relevant MSC-certified fisheries

Table 14: Harmonisation review for those Performance Indicators where a score of 15 points or more difference between the AAFA and WFOA or NZ scores is proposed.

PI	WFOA (certified 2010)	NZ (certified 2011)	AAFA North Pacific (proposed)	Key Differences
1.1.1	80	100	100	There is a high degree of certainty, thereby meeting the SG100 level.
1.1.2	75	75	70	N/a
1.1.3	n/a	n/a	n/s	N/a
1.2.1	95	80	85	N/A
1.2.2	80	60	60	There is only an implicit control rule in place, so meeting only the SG60 level.
1.2.3	100	80	100	A comprehensive range of information is considered to be available.
1.2.4	100	85	95	N/a
2.1.1	100 / 90	90	100	N/a
2.1.2	100	95	100	N/a
2.1.3	100	85	95	N/a
2.2.1	100	85	100	N/a
2.2.2	100	80	90	N/a
2.2.3	90	80	80	N/a
2.3.1	100	85	100	N/a
2.3.2	85	95	85	N/a
2.3.3	80	80	80	N/a
2.4.1	100	100	100	N/a
2.4.2	100	100	100	N/a
2.4.3	100	100	100	N/a
2.5.1	100	95	100	N/a
2.5.2	100	80	100	The HMS and CPS Fishery Management Plans meet the SG100 level.
2.5.3	100	80	100	The information is simply considered to meet the higher SG100 level.
3.1.1	90	95	95	N/a
3.1.2	100	95	100	N/a
3.1.3	100	80	100	Long-term objectives are explicit and required, so meeting the SG100 level.
3.1.4	80	80	100	International and US domestic reviews are considered to meet the SG100 level.
3.2.1	100	70	100	There was no FMP in place for the NZ fishery, but the US fishery has an FMP.
3.2.2	95	90	90	N/a
3.2.3	95	90	90	N/a
3.2.4	90	80	90	N/a
3.2.5	80	80	80	N/a



Appendix 6: NMFS letter of support for AAFA actions



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southwest Region
501 West Ocean Boulevard, Suite 4200
Long Beach, California 90802-4213

OCT -4 2012

Ms. Natalie Webster
Director of Operations
American Albacore Fishing Association
4364 Bonita Road, #311
Bonita, California 91902

Dear Ms. Webster:

This letter responds to the American Albacore Fishing Association's (AAFA) request for support of its action plans to meet conditions associated with its re-assessment for sustainable fishery certifications by the Marine Stewardship Council. NOAA's National Marine Fisheries Service (NOAA Fisheries) has reviewed AAFA's action plans proposed over the course of the certification. The agency is pleased that AAFA recognizes the importance of and supports efforts to develop biological reference points and appropriate harvest control rules that would apply to all fishery mortality for both the North Pacific and South Pacific albacore stocks. The agency welcomes AAFA's proposal to work cooperatively through the U.S. delegations to the Inter-American Tropical Tuna Commission, the Western Central Pacific Fisheries Commission, and the Pacific Fishery Management Council to promote the development and adoption of appropriate reference points and control rules. These actions are key to the development of a precautionary-based management framework for both albacore stocks.

Sincerely,

Rodney R. McInnis
Regional Administrator





Appendix 7: Initial letter from the World Wildlife Fund



World Wildlife Fund
Fisheries
1250 24th St. NW
Washington, DC 20037-1193
Main Phone: 202-293-4800
Fax: 202-223-6971
worldwildlife.org

27 October, 2011

Dr. Rob Blyth-Skyrme
Intertek Moody Marine
Merlin House, Stanier Way
Wyvern Business Park
Derby DE21 6BF
UK

Subject: American Albacore Fishing Association (AAFA) North Pacific Albacore Pole & Line and Troll/Jig Fishery, and American Albacore Fishing Association (AAFA) South Pacific Albacore Pole & Line and Troll/Jig Fishery

Dear Dr. Blyth-Skyrme:

WWF welcomes the opportunity to engage as a stakeholder in the assessment for re-certification of the AAFA North and South Pacific albacore pole & line and troll/jig fisheries. We have the following concerns regarding the re-assessments:

1. Stock Status. Some of the Principle 1 (P1) indicators are not met by any of the regional fishery management organizations (RFMOs) for tuna, including the Inter-American Tropical Tuna Commission (IATTC) and the Western and Central Pacific Fisheries Commission (WCPFC), which are responsible for the management of the North Pacific and South Pacific albacore stocks. For example, while there is an implicit reference point in the treaties establishing these two RFMOs, it is not precautionary, nor is it adopted formally by the RFMOs, nor is it explicitly designated as either the target or limit reference point. These are required in order for a fishery to meet the MSC Standard. WWF is aware that in the case of the WCPFC and North Pacific albacore stock that an interim working reference point has been used as a proxy for BMSY, but again this does not meet the stringent MSC requirement of having two precautionary reference points, both target and limit. In addition, there are similar shortcomings against the FAM for a harvest control rule tied explicitly to the reference points and an over-arching specific fishery management plan for the stocks. There are other less obvious P1 deficiencies that stem from the RFMOs' management that WWF looks forward to reviewing in the draft assessment reports.

2. Previous Conditions. The current certifications for these two stocks were based on one or more conditions. WWF believes that, based on its review of the records available to it and knowledge of the actions of the client, these conditions have not been met. WWF's information may be incomplete and it looks forward to reviewing material presented by the client as a basis for moving forward into re-certification. WWF recognizes that the formal MSC guidelines with regard to conditions and, indeed, the FAM itself have been substantially strengthened since the time of AAFA's initial certification



(i.e., FAM v.2 and TAB Directive 033). However, even though the current conditions for the two units of certification (UoCs) are not articulated as explicitly as is now required by the MSC, the conditions as stated – and the spirit of the MSC standard – were not met. Looking forward, should the client again be certified with conditions, WWF points out that the conditions imposed on the New Zealand albacore fishery serve as a good example for tuna fisheries, especially because they require the firm official commitment of the government of New Zealand to represent the fishery at the WCPFC since the RFMO is comprised of sovereign governments and affords little to no direct stakeholder involvement. WWF believes that a similar commitment from the UoC's national government should be required in order to meet conditions that involve changes at the RFMO level.

3. Bait fishes. For the pole & line component of the fishery, bait fishes are required for the fishery to even exist much less be sustainable, and therefore are a target species that should be included in the UoCs and assessed under P1. Furthermore, WWF is opposed to assessing impacts on bait fishes under Principle 2 of the default FAM as an alternative to including them in the UoC. For the pole & line fishery to be truly sustainable, bait fishes must be managed at least as well as the albacore themselves. Since the bait fishes used are low trophic level species in the ecosystem, TAB Directive 036 (Assessment of Low Trophic Level Fisheries) applies, providing reasonable guidance on default reference points for bait fishes. WWF believes that the best course is to include bait fishes in the UoCs and assess them under P1 but, failing that, TAB Directive 036 provides excellent guidance for appropriately modifying the FAM to ensure that bait fishes will be managed at a level that meets the MSC standard.

4. Management Levels. For fish stocks to be sustainable and meet the MSC standard they must be adequately managed throughout their range. For the Pacific albacore stocks, the legally competent bodies to accomplish this are the IATTC and WCPFC. Also of critical importance are national, regional, and local jurisdictions, but these are of decreasing importance due to the pan-Pacific nature of the albacore stocks. This entire cascade of legal structure starting with the RFMOs needs to be assessed under Principle 3. The top body, or RFMO, that jointly covers the range of each stock is of utmost importance and needs to be weighed accordingly when assessing Principle 3.

While it is unlikely that anyone from WWF will personally attend the site visits due to schedule conflicts, this does not reflect any lack of interest in ensuring that Intertek Moody Marine completes the best, most rigorous assessments possible. WWF looks forward to explicit responses to our concerns as expressed here and to engaging in the assessments.

Best Regards,

William W. Fox, Jr., Ph.D.
Vice President, Fisheries
WWF-US



Appendix 8: Initial letter from the International Seafood Sustainability Foundation

International Seafood Sustainability Foundation



6 October, 2011

Dr. Rob Blyth-Skyrme
Intertek Moody Marine
Merlin House, Stanier Way
Wyvern Business Park
Derby DE21 6BF
UK

**Subject: American Albacore Fishing Association (AAFA) North Pacific Albacore Pole & Line and Troll/Jig Fishery, and
American Albacore Fishing Association (AAFA) South Pacific Albacore Pole & Line and Troll/Jig Fishery**

Dear Dr. Blyth-Skyrme:

ISSF welcomes the opportunity to provide input as a stakeholder in the re-certification assessment of these two fisheries. We have the following concerns that we hope will be adequately assessed in the reassessments:

1) Conditions. The intent of the MSC is that conditions should normally be closed out within the period of certification. This is not the case for the AAFA albacore fisheries and, in our understanding, there is not even evidence that adequate progress has been made towards adoption of reference points, harvest strategies and control rules. The conditions in the original assessments were simply too weak and unrealistic in the expectation that the Client would be able to influence RFMOs to adopt these for the Pacific albacore stocks. Still, we recognize the fact that MSC guidance on condition setting and recertification was not very clear at the time of the original assessment. We request, however, that the new assessment takes this problem very seriously into consideration. If the new assessments recommend MSC certification again, it is imperative to follow TAB Directive 033 (Condition Setting and Reporting) with achievable milestones. In this sense, we recommend that the assessment team look at the language in the conditions placed on the certification of the New Zealand albacore troll fishery.

2) Baitfish management. For the pole and line component of the fishery, we are against following the FAM default scoring guidelines for baitfish under Principle 2. Since baitfish are required for the fishery, it is imperative that they be managed just as well as albacore. And, their role as low trophic level species in the ecosystem needs to be addressed as well. We believe that TAB Directive 036 (Assessment of Low Trophic Level Fisheries) provides good guidance on default reference points for baitfish populations and we recommend that the assessment team use these standards instead of the default FAM scoring guidelines.

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3) The role of the RFMOs under Principle 3. ISSF is of the view that the role of the RFMOs in managing highly migratory species like albacore is of utmost importance. The re-assessment of these fisheries needs to take this into account by giving higher weight to the management framework and performance at the RFMO level than at the national level.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Susan S. Jackson", written over a light grey horizontal line.

Susan S. Jackson
President

Cc: R. Howes
V. Restrepo
W. Fox
B. Ack

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Appendix 9: Peer Review Report #1

Overall Opinion

<i>Has the assessment team arrived at an appropriate conclusion based on the evidence presented in the assessment report?</i>	Yes/No Yes	Conformity Response	Assessment	Body
<i>Justification:</i> Subject to clarification of two items discussed in the “general comments” section below, I feel the conclusion of the team is appropriate, based primarily on the fact that I would have assigned identical or nearly identical scores for most of the issues.		Noted and thank you- the assessment team has made detailed comments against each of the PIs below.		

<i>Do you think the condition(s) raised are appropriately written to achieve the SG80 outcome within the specified timeframe?</i>	Yes/No Yes	Conformity Response	Assessment	Body
<i>Justification:</i> As stated below, there appears to be considerable interest in WCPFC and IATTC on establishing reference points. Accordingly, it is quite likely that the commissions will establish the required reference points by the 4th annual audit.		The assessment team thanks the peer reviewer for this input- it is noted and welcomed.		

If included:

<i>Do you think the client action plan is sufficient to close the conditions raised?</i>	Yes/No o Yes	Conformity Assessment Body Response		
<i>Justification:</i> The client action plan only requires the client to “work actively” towards establishing reference points and harvest control rules, but those efforts in conjunction with increased interest on the part if IATTC/WCPFC, and pressure from other groups for reference points and harvest control rules are likely to counteract any forces that may be against establishing such points/rules.		Again, this comment is welcomed. The assessment team is certainly keen to promote positive collaborative working between AAFA and other groups and, assuming the fishery is recertified, any annual audit team should be interested in reviewing AAFA’s commitment to “report on efforts to explore appropriate opportunities with other tuna fisheries, associations, or organizations with complimentary objectives.” (as stated in the Client Action Plan).		

General Comments on the Assessment Report (optional)

The report is very well-written by specialists with a great deal of historical involvement with the fishery. Any disagreements I have with the report are fairly minor.

I believe that two items require some additional thought or at least clarification in the assessments team’s report: (a) unfulfilled conditions of the 2007 assessment, and (b) how baitfish are treated in the assessment.

In the letters of both WWF and ISSF there is mention of conditions in the 2007 assessment that have not been met. It would be useful the assessment report could state the MSC policy or rule on unfulfilled conditions of a previous assessment as they relate to a follow-up assessment.



IMM Response: A condition was set against the AAFA North Pacific albacore fishery when it was certified in 2007. However, this was closed out in 2009 and the AAFA North Pacific fishery proceeded to recertification with no conditions on the existing certificate. The WWF and ISSF comments related to the AAFA South Pacific fishery which is undergoing reassessment at the same time as the North Pacific fishery, and which had one condition that was carried forward to reassessment. The situation with regard to the conditions in each fishery is explained in Section 4.1 of each report.

Baitfish are an important component of the North Pacific North Pacific Albacore Pole & Line and Troll/Jig Fishery. I recently completed a study of the baitfisheries that support the major pole-and-line fisheries of the world¹, which contains a section on the baitfishery of relevance to this MSC assessment. I am not convinced of the need/value of attempting to manage small baitfisheries that are nested within much larger over-all fisheries (which is the case for the baitfishery that supports this albacore fishery). What would be useful in the assessment report is an upfront statement of how baitfish will be treated in the report - In some respects, the issue of baitfish do not fit neatly into the MSC framework, hence a need for an explicit statement in the assessment report on how they will be treated. For example, in the Maldives pole-and-line MSC fishery assessment report, baitfish are treated as “bycatch discarded species”.

IMM Response: The MSC Certification Requirements V1.2 (MSC CR) provides clarity on where baitfish fisheries should be incorporated into the MSC assessment process- it is against Performance Indicators (PIs) 2.1.1 – 2.1.3 as retained species. Text was provided in Section 3.4.3 of the assessment report that referenced the MSC CR, but this now specifies Section CB 3.5.5 of the MSC CR.

Another point is that baitfishing is an important part of this albacore fishery, but this fact appears to be downplayed in at least some sections of the assessment report. For example, it is stated that “The AAFA North Pacific albacore pole and troll fishery operates entirely at the surface in deep, oceanic water”, but the baitfish component of the fishery operates in shallow inshore areas.

IMM Response: Following the previous point above, baitfish are incorporated into the MSC assessment process as retained species and the northern anchovy stock status, management and information provision are considered under PI 2.1.1, 2.1.2 and 2.1.3 respectively. As such, and although the baitfish fishery takes place in the shallow inshore, the baitfish fishery is not required to be considered against other PIs (e.g. ETP, habitat or ecosystem impacts), or against the detailed and separate Principle 1 (stock status) or Principle 3 (management) PIs that the AAFA albacore fishery under assessment is assessed. As such, the intention is not to downplay the role of the baitfish fishery by referring to the AAFA fishery as operating entirely at the surface in deep, oceanic water, it is simply that the MSC guidance on baitfish fisheries has been followed. Nevertheless, clarification of the exclusion of the baitfish fishery from further assessment has been provided following the referenced ‘*entirely in deep, oceanic water*’ text at Section 3.4.5 and in the SG 60 Sis of PI 2.4.1, 2.4.2 and 2.4.3.

¹ Gillett, R. (2012). The Management of Tuna Baitfisheries: The Results of a Global Study. International Seafood Sustainability Foundation, Washington DC, 72 pages. [available on the ISSF website]

Performance Indicator Review

Please complete the table below for each Performance Indicator which are listed in the Conformity Assessment Body's Public Certification Draft Report.

Performance Indicator	Has all the relevant information available been used to score this Indicator? (Yes/No)	Does the information and/or rationale used to score this Indicator support the given score? (Yes/No)	Will the condition(s) raised improve the fishery's performance to the SG80 level? (Yes/No/NA)	Justification Please support your answers by referring to specific scoring issues and any relevant documentation where possible. Please attach additional pages if necessary.	Conformity Assessment Body Response
1.1.1	Yes	Yes	N/A	The scoring and justification are appropriate.	Noted and thank you.
1.1.2	Yes	Yes	Yes (see right)	<p>The conditions require that the client is to demonstrate by the 4th annual audit that:</p> <p>(a) The limit reference point is set above the level at which there is an appreciable risk of impairing reproductive capacity.</p> <p>(b) The target reference point is such that the stock is maintained at a level consistent with BMSY or some measure or surrogate with similar intent or outcome.</p> <p>Considering the current increased interest in WCPFC and IATTC on establishing reference points, it is quite likely that the Commissions will establish the required reference points by the 4th annual audit.</p>	Noted and thank you. The assessment team is naturally hopeful that the requisite progress to close the conditions on the AAFA fishery can be made. The peer reviewers comments on the RFMOs is therefore clearly encouraging.
1.1.3	N/A	N/A	N/A	The stock is not considered to be depleted, and so this performance indicator is not scored.	Noted and agreed, thank you.
1.2.1	No (see right)	No	N/A	The report of the 2012 WCPFC SC indicates an "increase in catches of North Pacific albacore from 2008 to 2010 and in 2011" – but this information does not	The assessment team notes that the 2012 WCPFC-SC information is now available, but a line needs to be drawn at some point on collecting and including



Performance Indicator	Has all the relevant information available been used to score this Indicator? (Yes/No)	Does the information and/or rationale used to score this Indicator support the given score? (Yes/No)	Will the condition(s) raised improve the fishery's performance to the SG80 level? (Yes/No/NA)	Justification Please support your answers by referring to specific scoring issues and any relevant documentation where possible. Please attach additional pages if necessary.	Conformity Assessment Body Response
				<p>appear to have been taken in consideration when scoring this indicator. It is, however, realized that the SC report was not available at the time the assessment report was completed.</p> <p>Due to the fact that target and limit reference points have not been formally adopted and that catch has been creeping upwards in the last few years, I feel that a score of 90 may be too high; suggest 80</p>	<p>additional data for the assessment. We feel we can add the very recent WCPFC information in at the first annual audit without jeopardising the validity of the assessment or the MSC standard.</p> <p>It may also be noted that the assessment includes consideration of US Domestic management arrangements, which are considered to meet the level of performance required for the 90 score.</p>
1.2.2	Yes, but see comment to right	Yes	Yes	<p>The scoring and justification are appropriate.</p> <p>Some additional information on an important subject would be useful. The assessment states that "Letters of support will be provided as soon as they are available".</p> <p>It would be useful to state whether IATTC/WCPFC as a matter of normal practice provide such letters of support – or whether this is a special/exceptional request.</p>	<p>Noted and thank you.</p> <p>It is noted that fisheries cannot proceed to the Public Comment Draft Report stage without consulting an entity/entities that will be relied upon for involvement, funding and/or resources to close conditions (CR Section 27.11.3) .</p> <p>However, engaging RFMOs to the extent that letters of support are provided has not been required for certification, based</p>



Performance Indicator	Has all the relevant information available been used to score this Indicator? (Yes/No)	Does the information and/or rationale used to score this Indicator support the given score? (Yes/No)	Will the condition(s) raised improve the fishery's performance to the SG80 level? (Yes/No/NA)	Justification Please support your answers by referring to specific scoring issues and any relevant documentation where possible. Please attach additional pages if necessary.	Conformity Assessment Body Response
					<p>on an acceptance that such a letter would be very unlikely to come from international management bodies. Nevertheless, the IATTC and WCPFC secretariats have been notified and updated on the AAFA assessment process as it has proceeded.</p> <p>Instead, letters of support have been sought from US Domestic managers. Such a letter of support for the AAFA actions has now been included from the NMFS Regional Administrator, Mr. Rodney McInnis. The AAFA certification is also recommended based on the evidence that the PFMC and US Delegations to the RFMOs are engaged in improving the management of the fishery, the necessary research budgets are in place and that meetings will be scheduled and held as required.</p>
1.2.3	Yes	Yes	N/A	The scoring and justification are appropriate	Noted and thank you.



Performance Indicator	Has all the relevant information available been used to score this Indicator? (Yes/No)	Does the information and/or rationale used to score this Indicator support the given score? (Yes/No)	Will the condition(s) raised improve the fishery's performance to the SG80 level? (Yes/No/NA)	Justification Please support your answers by referring to specific scoring issues and any relevant documentation where possible. Please attach additional pages if necessary.	Conformity Assessment Body Response
1.2.4	Yes	Yes	N/A	The scoring and justification are appropriate – it is only the lack of an external peer review that prevents a higher score.	Noted and thank you.
2.1.1	Some additional information on anchovy and its relative use in the albacore fishery may be useful in the context it provides (see right)	Yes	n/a	<ul style="list-style-type: none"> The baitfishery is based on a resource that is primarily used for other purposes. In US waters the resource is also used for human consumption and for sportfishing bait. The statistical information on anchovy catches usually does not distinguish between the various bait uses: (a) dead/packaged bait, (b) live bait for recreational fishing, and (c) live bait for commercial tuna fishing. Baitfishing for sportfishing is much more significant than that for commercial tuna fishing: (a) Approximately 18 live bait vessels in southern California and two vessels in Oregon and Washington landed about 4,000 mt per year of coastal small pelagics (mostly northern anchovy and Pacific sardine) for sale to recreational anglers, and (b) Roundhaul vessels take a maximum of 1,000 mt to 3,000 mt per year of northern anchovy that are sold as dead bait to recreational anglers. In the 1950s and 1960s the annual US west coast catch of the northern anchovy reached 50,000 tonnes in several years. In the decade of the 2000s, total annual anchovy catches in California, Oregon and Washington ranged 	Noted and thank you. The information is incorporated into Section 3.4.3 of the assessment report. For scoring PI 2.1.1, a note has been added on the amount of bait usage by the AAFA fleet in comparison to quantities used for other purposes, as recommended.



Performance Indicator	Has all the relevant information available been used to score this Indicator? (Yes/No)	Does the information and/or rationale used to score this Indicator support the given score? (Yes/No)	Will the condition(s) raised improve the fishery's performance to the SG80 level? (Yes/No/NA)	Justification Please support your answers by referring to specific scoring issues and any relevant documentation where possible. Please attach additional pages if necessary.	Conformity Assessment Body Response
				from 1,676 to 19,277 tonnes <u>SOURCE</u> : PFMC (2011). Status of the Pacific Coast Coastal Pelagic Species Fishery. Pacific Fishery Management Council.	
2.1.2	Yes	Yes	n/a	The scoring and justification are appropriate	Noted and thank you.
2.1.3	Some additional info (see right) would add clarity	Yes	n/a	The scoring and justification are appropriate, but some additional info would add clarity: “While anchovy are thought to be abundant, there is no current information on the status of northern anchovy populations. Anchovy fisheries are managed based on annual harvest data. Scientists monitor harvest of northern anchovy, and the harvest has been low in recent years.” Source: NMFS (2012). Pacific Albacore Tuna. Fishwatch. Available at: http://www.fishwatch.gov/seafood_profiles	Noted and thank you. The reference has been added to this PI for clarity.
2.2.1	Yes	Yes	n/a	The scoring and justification are appropriate	Noted and thank you.
2.2.2	Yes, but possible typo in text (see	Yes	n/a	‘.....undersized albacore are likely (UNLIKELY??) to constitute anything approaching...’	Thank you- this was a typographic error and the correction has been made.



Performance Indicator	Has all the relevant information available been used to score this Indicator? (Yes/No)	Does the information and/or rationale used to score this Indicator support the given score? (Yes/No)	Will the condition(s) raised improve the fishery's performance to the SG80 level? (Yes/No/NA)	Justification Please support your answers by referring to specific scoring issues and any relevant documentation where possible. Please attach additional pages if necessary.	Conformity Assessment Body Response
	right)				
2.2.3	Yes	No; suggest 85	n/a	<p>The assessment report states: "it cannot be said that accurate and verifiable information on the amount of all bycatch is available"</p> <p>I believe that it deserves more than an 80 score due to the fact that some available & verifiable observer data supports the contention of "effectively negligible" amounts of bycatch. I understand that in the early 1990s there were a few years of observer data (mostly in conjunction with the gillnet issue), plus several research project projects carried out opportunistically aboard the vessels. I believe that both types of information would give support to the contention of "effectively negligible" amounts of bycatch.</p>	It is also the assessment team's understanding that there are bycatch data from opportunistic studies and from surveys undertaken aboard albacore pole and troll vessels in previous years. However, these data were not available for the assessment of the AAFA fishery and so were not taken directly into account in scoring the fishery at 80 for this PI. In the absence of the data being available for scrutiny, it is still considered that 80 is an appropriate score.
2.3.1	Yes	Yes	n/a	The scoring and justification are appropriate	Noted and thank you.
2.3.2	Yes	Yes	n/a	The scoring and justification are appropriate	Noted and thank you.
2.3.3	A qualified yes (see right)	Yes	n/a	The scoring and justification are appropriate	As noted in the CAB's response to PI 2.2.3, such data were not available to the



Performance Indicator	Has all the relevant information available been used to score this Indicator? (Yes/No)	Does the information and/or rationale used to score this Indicator support the given score? (Yes/No)	Will the condition(s) raised improve the fishery's performance to the SG80 level? (Yes/No/NA)	Justification Please support your answers by referring to specific scoring issues and any relevant documentation where possible. Please attach additional pages if necessary.	Conformity Assessment Body Response
				I understand that in the early 1990s that there were several years of observer data, mainly dealing with gillnet issues, but which contain bycatch info	team for this assessment. As such, they were not taken directly into account when scoring the fishery for this PI.
2.4.1	No (see right)	Yes	N/A	This statement is repeated several times in the assessment: "The AAFA North Pacific albacore pole and troll fishery operates entirely at the surface in deep, oceanic water". While true, the baitfishery which is an integral part of the fishing operation does not "operate entirely at the surface in deep, oceanic water" and at least some mention should be made of that.	As noted against the general comments section, above, the northern anchovy is only considered against the retained species components of the assessment (i.e., PIs 2.1.1 – 2.1.3). As such, the fishery under assessment is the AAFA albacore fishery that takes place only in deep, oceanic water. A comment to this effect has been added to the text of SI 60a, noting this fact.
2.4.2	No (see right)	Yes	N/A	As above, this statement is repeated several times: "The AAFA North Pacific albacore pole and troll fishery operates entirely at the surface in deep, oceanic water". While true, the baitfishery which is an integral part of the fishing operation does not "operate entirely at the surface in deep, oceanic water" and at least some mention should be made of that.	In common with the CAB response against PI 2.4.1, a comment has been added at PI 2.4.2, SI 60a to note that, as a baitfish, the northern anchovy is assessed only against the retained species PIs.
2.4.3	No (see right)	Yes	N/A	As above, this statement is repeated several times: "The	In common with the CAB response



Performance Indicator	Has all the relevant information available been used to score this Indicator? (Yes/No)	Does the information and/or rationale used to score this Indicator support the given score? (Yes/No)	Will the condition(s) raised improve the fishery's performance to the SG80 level? (Yes/No/NA)	Justification Please support your answers by referring to specific scoring issues and any relevant documentation where possible. Please attach additional pages if necessary.	Conformity Assessment Body Response
				AAFA North Pacific albacore pole and troll fishery operates entirely at the surface in deep, oceanic water". While true, the baitfishery which is an integral part of the fishing operation does not "operate entirely at the surface in deep, oceanic water" and at least some mention should be made of that.	against PI 2.4.1, a comment has been added at PI 2.4.3, SI 60a to note that, as a baitfish, the northern anchovy is assessed only against the retained species PIs.
2.5.1	Yes	Yes	n/a	The scoring and justification are appropriate	Noted and thank you.
2.5.2	Yes, but see comment to right	Yes	n/a	<p>The scoring is appropriate but the justification may have a typographical error.</p> <p>The text of the assessment states: "There is a plan and an operational strategy that, based on information directly from the fishery, is considered to be working to manage all the main impacts of the fishery on the ecosystem. As such, these scoring issues have NOT been met".</p> <p>Following from the information given, it would seem that "...these scoring issues <u>HAVE</u> been met".</p>	Thank you- this was a typographic error and the correction has been made.
2.5.3	Yes	Yes	n/a	The scoring and justification are appropriate	Noted and thank you.



Performance Indicator	Has all the relevant information available been used to score this Indicator? (Yes/No)	Does the information and/or rationale used to score this Indicator support the given score? (Yes/No)	Will the condition(s) raised improve the fishery's performance to the SG80 level? (Yes/No/NA)	Justification Please support your answers by referring to specific scoring issues and any relevant documentation where possible. Please attach additional pages if necessary.	Conformity Assessment Body Response
3.1.1	Yes	Yes	n/a	The scoring and justification are appropriate	Noted and thank you.
3.1.2	Yes	Yes	n/a	The scoring and justification are appropriate	Noted and thank you.
3.1.3	Yes	Yes	n/a	The scoring and justification are appropriate	Noted and thank you.
3.1.4	Yes	Yes	n/a	The scoring and justification are appropriate	Noted and thank you.
3.2.1	See right	No, suggest 90	N/A	There is some question that the short and long-term objectives cited in the mission statement of the AAFA are "measurable" or verifiable. At the very least, the relevant information to allow this to be seen is not presented.	Thank you- the comment on the AAFA mission statement is accepted and the assesment team has removed the reference. Nevertheless, and consistent with the AAFA South pacific fishery, the assessment team contends that the fishery meets the SG100 level of performance for this PI.
3.2.2	Yes	Yes	n/a	The scoring and justification are appropriate	Noted and thank you.
3.2.3	No, see right	Yes	n/a	In general at the international level, there is much detailed information on this subject from annual	Noted and thank you. Readers are pointed to relevant sources of



Performance Indicator	Has all the relevant information available been used to score this Indicator? (Yes/No)	Does the information and/or rationale used to score this Indicator support the given score? (Yes/No)	Will the condition(s) raised improve the fishery's performance to the SG80 level? (Yes/No/NA)	Justification Please support your answers by referring to specific scoring issues and any relevant documentation where possible. Please attach additional pages if necessary.	Conformity Assessment Body Response
				meetings of IATTC/WCPFC that demonstrates the degree to which management measures have been enforced and complied with. For example, in the report of the WCPFC's Annual TCC report. This is information than the general statements that are currently provided by the assessors.	information, but further detailed information has not been added as the assessment team felt it unnecessary for scoring the fishery.
3.2.4	Yes	Yes	n/a	The scoring and justification are appropriate	Noted and thank you.
3.2.5	Yes	Yes	n/a	The scoring and justification are appropriate	Noted and thank you.

Any Other Comments

Comments	Conformity Assessment Body Response



Appendix 10: Peer Review Report #2

Overall Opinion

<p>Has the assessment team arrived at an appropriate conclusion based on the evidence presented in the assessment report?</p>	<p>Yes</p>	<p>Conformity Assessment Body Response</p>
<p><u>Justification:</u> <i>The certification report findings are appropriate and the conditions and recommendation are in accordance with material presented in the report.</i></p>		<p>Noted and thank you.</p>

<p>Do you think the condition(s) raised are appropriately written to achieve the SG80 outcome within the specified timeframe?</p>	<p>No</p>	<p>Conformity Assessment Body Response</p>
<p><u>Justification:</u> <i>The conditions raised are necessary and appropriate to achieve SG80 outcomes, noting that actions are required by a body other than the client and that required outcomes involve adoption of appropriate measures by the RFMO.</i></p> <p><i>The suggested outcomes for the conditions are in accordance with other albacore fisheries that have been certified or are seeking certification. However, the MSC Guidance to Certification Requirements suggests that timelines should be harmonized with those of overlapping fisheries (GCI 1.4). Although the North Pacific Albacore Troll Fishery is targeting a different stock, the processes involved in ensuring the establishment of target and limit reference points and harvest control rules are shared with fisheries targeting albacore in the South Pacific (AAFA South Pacific albacore troll, New Zealand albacore troll and Fiji albacore longline fishery).</i></p>		<p>Noted and thank you on the necessity of the two conditions and on the need for the action to be taken by a body other than the client.</p> <p>On harmonization, the CR (V.1.2) states At Section C13.1 that 'CABs assessing overlapping fisheries shall ensure consistency of outcomes so as not to undermine the integrity of MSC fishery assessments', while the guidance provided in The GCR (V1.1) at Section GCI 1.6 is that 'MSC expects that the outcome of the assessment, particularly the overall result that is achieved (whether a pass or a fail) and the setting of conditions, will be consistent between overlapping fisheries in assessment and certified fisheries'.</p> <p>The assessment team contends that the outcomes are consistent between the Conditions placed on the New Zealand South Pacific and AAFA North Pacific albacore fisheries (i.e., reference points (for PI 1.1.2) and harvest control rules (for PI 1.2.2) must be adopted in order for the Conditions to be closed out). However, it is also the assessment team's contention that, on timelines, the AAFA fishery justifies an additional year to meet the Conditions because of the need to engage two RFMOS (WCPFC and IATTC) rather than the single RFMO (WCPFC) that the New Zealand fishery (and the Fiji albacore fishery, if certified) must engage in order to meet their Conditions. Therefore, the AAFA assessment team continues to advocate and accept a four year timeline to close the two Conditions proposed. It may also be noted that the single Condition on the WFOA and CHMSF North Pacific albacore fisheries was introduced before guidance requiring that Conditions are time-bound and outcome focused was provided. As such, the Condition on those fisheries is not considered valuable for harmonization purposes in this case.</p>



If included:

Do you think the client action plan is sufficient to close the conditions raised?	Yes	Conformity Assessment Body Response
<p><u>Justification:</u> <i>The client action plan is sufficient to close the conditions, although the issue of the timeline raised above will need to be addressed. In addition, the client action plan would benefit from the addition of activities to promote collaboration with other interested industry sectors and NGOs to assist the adoption of the necessary outcomes.</i></p>		<p>Noted and thank you on the Client Action Plan.</p> <p>On the issue of harmonization, please see the CAB response against the conditions, in the box above.</p> <p>On the promotion of collaboration, it is noted that a statement in the Client Action Plan is that ‘AAFA will report on efforts to explore appropriate opportunities with other tuna fisheries, associations, or organizations with complimentary objectives.’ Although this is non-specific regarding activities to promote collaboration, it is the assessment team’s contention that being specific at this time is not feasible. However, we agree that, should the fishery be certified, such efforts will be needed if the Conditions are to be met.</p>

General Comments on the Assessment Report (optional)

The certification report is well presented and provides clear and concise information to support the assessment of each feature of the fishery against the three MSC Principles. In general, I agree with the majority of the scoring for the fishery and have made few suggestions for changes to the report.

IMM Response: Noted and thank you. The assessment team has provided detailed comments against each of the comments below.

Using the “MSC_Fishery_Assessment_Worksheet_v1” I estimate the overall score for P1 to be 85.6 rather than the 85.8 presented on page 7 and in Table 10 of the report. Similarly, I find a slight difference with the P2 score (94 vs 95.3) and the P3 score (97 vs 98).

IMM Response: The scores for a number of PIs have been changed as a result of the comments received from the peer reviewers and because of issues concerning partial scoring. As such, the confirmed draft scores are now 85.0 for Principle 1, 95.3 for Principle 2, and 94.4 for Principle 3.



Performance Indicator Review

Please complete the table below for each Performance Indicator which are listed in the Conformity Assessment Body's Public Certification Draft Report.

Performance Indicator	Has all the relevant information available been used to score this Indicator? (Yes/No)	Does the information and/or rationale used to score this Indicator support the given score? (Yes/No)	Will the condition(s) raised improve the fishery's performance to the SG80 level? (Yes/No/NA)	Justification Please support your answers by referring to specific scoring issues and any relevant documentation where possible. Please attach additional pages if necessary.	Conformity Assessment Body Response
1.1.1	Yes	Yes	NA	Sufficient information on stock status is given to justify the scoring, however, this section should reflect commentary from Section 3.3.3 of the report indicating that under low recruitment scenarios the probability that the stock will not achieve the management objective of remaining above the SSB-ATHL threshold increases to 50%, hence the assessment recommends that there should not be increased fishing effort..	The report has been modified to include reference to the information in Section 3.3.3 under SI 100b. This is that recruitment remains high and stable, so contributing to a low likelihood of recruitment overfishing, although under some risk analysis scenarios there is the potential for the stock to reach the SSB-ATHL limit threshold.
1.1.2	Yes	Yes	Yes (note comment re harmonization)	The lack of formally adopted target and limit reference points appropriately leads to a score of 70 for this PI and the generation of a condition. The actions suggested by the condition would benefit from collaboration with other interested parties to bring about adoption of necessary measures through WCPFC. In addition, MSC Guidelines suggest there	Noted and agreed on the score, thank you. The assessment team agrees with the reviewer that actions suggested by the condition would benefit from collaboration with other interested parties. However, as noted against the peer reviewer's earlier comments on the conditions, the



Performance Indicator	Has all the relevant information available been used to score this Indicator? (Yes/No)	Does the information and/or rationale used to score this Indicator support the given score? (Yes/No)	Will the condition(s) raised improve the fishery's performance to the SG80 level? (Yes/No/NA)	Justification Please support your answers by referring to specific scoring issues and any relevant documentation where possible. Please attach additional pages if necessary.	Conformity Assessment Body Response
				<p>should be harmonization of the timelines of the condition with other overlapping fisheries (probably including fisheries taking South Pacific albacore, as the steps to bring about change require implementation through WCPFC for both stocks).</p>	<p>assessment team does not believe that it is feasible to be specific on collaborations at this time. It should be noted, though, that should the fishery be certified then progress towards meeting the condition should be reviewed very carefully at annual surveillance audits.</p> <p>On harmonisation, the assessment team contends that the outcomes are the same, while the timelines justifiably differ. More detail is provided in the earlier box specific to setting the conditions.</p>
1.1.3	NA	NA	NA		
1.2.1	Yes	No	NA	<p>SG80a requires not just that elements of the harvest strategy exist (i.e. monitoring, assessment, management etc) but that they “work together”. There is insufficient information given on how the elements of the harvest strategy work together to achieve management objectives. Also, SG100b suggests that the harvest strategy has been fully evaluated through</p>	<p>On ‘working together’, it is the assessment team’s contention that monitoring and assessment data show that the harvest strategy, based on effort control, has proved effective in maintaining the stock. Additional information has been provided against SI 80a.</p>



Performance Indicator	Has all the relevant information available been used to score this Indicator? (Yes/No)	Does the information and/or rationale used to score this Indicator support the given score? (Yes/No)	Will the condition(s) raised improve the fishery's performance to the SG80 level? (Yes/No/NA)	Justification Please support your answers by referring to specific scoring issues and any relevant documentation where possible. Please attach additional pages if necessary.	Conformity Assessment Body Response
				the stock assessment process. There are other aspects to the harvest strategy that require evaluation/	On the evaluation of the harvest strategy, the assessment team has reviewed the available information and can confirm that the fishery does not meet the level of performance required for SI 100b. As such, the score for this PI has been reduced to 85.
1.2.2	Yes	Yes	Yes (note comment re harmonization)	The scoring appropriately reflects that SG80 requirements are not met and the suggested condition should improve the fishery's performance. However, the actions suggested by the condition would benefit from collaboration with other interested parties to bring about adoption of necessary measures through WCPFC. In addition, MSC Guidelines suggest there should be harmonization of the timelines of the condition with other overlapping fisheries fisheries (probably including fisheries taking South Pacific albacore, as the steps to bring about change require implementation through WCPFC for both stocks)..	Noted and thank you on the suggested condition. On collaboration and timelines, please see the comments shown against PI 1.1.2, which apply equally here.



Performance Indicator	Has all the relevant information available been used to score this Indicator? (Yes/No)	Does the information and/or rationale used to score this Indicator support the given score? (Yes/No)	Will the condition(s) raised improve the fishery's performance to the SG80 level? (Yes/No/NA)	Justification Please support your answers by referring to specific scoring issues and any relevant documentation where possible. Please attach additional pages if necessary.	Conformity Assessment Body Response
1.2.3	Yes	No	NA	<p>The SG80 scoring issues are met satisfactorily. However, the support given to there being “a comprehensive range of information” is questionable. For example, assessment outcomes are sensitive to assumptions growth and the assessment acknowledges the need for further research on this. Also, SG100b states that all information required by the harvest control rule is monitored with high frequency and a high degree of certainty. Whilst there is extensive data collected it is difficult to suggest that all required information is collected when formal harvest control rules are not in place..</p>	<p>On the availability of information, the assessment team continues to contend that the fishery meets the standard required by SI 100a. Full details of the information available are provided in the assessment report, but it includes data on the ontogenic and seasonal patterns of migrations, seasonal variability in migrations, reliable estimates on fecundity, growth rates, and length and weight at age, fishery catches and size composition of landings. Although differential growth by sex has not been addressed in peer reviewed literature to the assessment team's knowledge, these data are not required for the stock assessment model used in the North Pacific.</p> <p>On the information required for the harvest control rule, a sentence has been added stating that the information collected would be adequate to support formal HCRs if they were introduced, and so the fishery meets this level of performance.</p>



Performance Indicator	Has all the relevant information available been used to score this Indicator? (Yes/No)	Does the information and/or rationale used to score this Indicator support the given score? (Yes/No)	Will the condition(s) raised improve the fishery's performance to the SG80 level? (Yes/No/NA)	Justification Please support your answers by referring to specific scoring issues and any relevant documentation where possible. Please attach additional pages if necessary.	Conformity Assessment Body Response
1.2.4	Yes	Yes	NA	Information provided supports the scores given for this PI. As suggested by the certifier, the assessment would benefit from formal peer review.	Noted and thank you.
2.1.1	Yes	No	NA	<p>The information and rationale given strongly support the SG80 issues. However, although catches are low, I am uncomfortable with a score of 100 for anchovy given the last full assessment of the stock was in 1995.</p> <p>Given the paucity of observer data for the fishery, I suggest that a recommendation is warranted that opportunities to undertake observer work for the fishery be investigated to support future P2 assessment.</p>	<p>Although the peer reviewers comment is noted and the last full assessment of the northern anchovy stock was undertaken in 1995, catch monitoring has been undertaken for many years and management benchmarks (overfishing limits as MSY proxies) have now been adopted. The PFMC (2010) considers that fishing pressure is limited and that the stocks are not overfished or experiencing overfishing, while NMFS (2012) considers anchovy to be abundant. The assessment team considers that this is evidence that is sufficient to meet the SG100 scoring issues.</p>
2.1.2	Yes	Yes	NA	Information provided supports the scores given for this PI.	Noted and thank you.



Performance Indicator	Has all the relevant information available been used to score this Indicator? (Yes/No)	Does the information and/or rationale used to score this Indicator support the given score? (Yes/No)	Will the condition(s) raised improve the fishery's performance to the SG80 level? (Yes/No/NA)	Justification Please support your answers by referring to specific scoring issues and any relevant documentation where possible. Please attach additional pages if necessary.	Conformity Assessment Body Response
2.1.3	Yes	Yes	NA	Information provided supports the scores given for this PI.	Noted and thank you.
2.2.1	Yes	Yes	NA	Information provided supports the scores given for this PI.	Noted and thank you.
2.2.2	Yes	Yes	NA	Information provided supports the scores given for this PI.	Noted and thank you.
2.2.3	Yes	Yes	NA	Information provided supports the scores given for this PI.	Noted and thank you.
2.3.1	Yes	No	NA	Whilst I agree that the nature of the fishing gear suggests that the level of interaction with ETP species is likely to be low, I feel that justification is sufficient to meet SG80 issues. However, with the lack of an observer program and lack of data on potential interactions presented it is difficult to support a score of 100..	Comprehensive, independent observer data are not available for the pole and troll fishery. Nonetheless, logbook data have been checked for albatross interactions and analyses have been undertaken to determine the likely impact of the fishery on ETP species. The assessment team considers that the results provide the necessary level of confidence to score the



Performance Indicator	Has all the relevant information available been used to score this Indicator? (Yes/No)	Does the information and/or rationale used to score this Indicator support the given score? (Yes/No)	Will the condition(s) raised improve the fishery's performance to the SG80 level? (Yes/No/NA)	Justification Please support your answers by referring to specific scoring issues and any relevant documentation where possible. Please attach additional pages if necessary.	Conformity Assessment Body Response
					fishery at 100 for this PI.
2.3.2	Yes	Yes	NA	I do not have access to the NMFS (2004) reference given for SG100b. Does it provide a quantitative analysis as required here?	The Biological Opinion is available at the following web address: http://swr.ucsd.edu/HMS_FMP_Opinion_Final.pdf . It confirms that a quantitative analysis was undertaken.
2.3.3	Yes	Yes	NA	Information provided supports the scores given for this PI.	Noted and thank you.
2.4.1	Yes	Yes	NA		Noted and thank you.
2.4.2	Yes	Yes	NA		Noted and thank you.
2.4.3	Yes	Yes	NA		Noted and thank you.
2.5.1	Yes	Yes	NA	The low level of catch in the fishery supports this outcome, however. studies of fishery removal impacts at the ecosystem level are lacking.	The peer reviewer's comment is noted and a comment on the value of information on the ecosystem impact of albacore fishery removals has been made against this PI. The score has not been adjusted.



Performance Indicator	Has all the relevant information available been used to score this Indicator? (Yes/No)	Does the information and/or rationale used to score this Indicator support the given score? (Yes/No)	Will the condition(s) raised improve the fishery's performance to the SG80 level? (Yes/No/NA)	Justification Please support your answers by referring to specific scoring issues and any relevant documentation where possible. Please attach additional pages if necessary.	Conformity Assessment Body Response
2.5.2	Yes	Yes	NA		Noted and thank you.
2.5.3	Yes	Yes	NA		Noted and thank you.
3.1.1	Yes	Probably	NA	I note that for AAFA South Pacific albacore SG100b brings about a score of 95 rather than 100 because "...the mechanism at the international level has not been tested and proven to be effective". Should this also apply here?	The assessment team agrees with the peer reviewer- the text as adopted for AAFA's South Pacific fishery assessment report is also appropriate for the North Pacific fishery, and so the score has been dropped to 95 by accepting that the fishery only meets the SG80 level of performance for SI b.
3.1.2	Yes	Yes	NA	The information provided supports the conclusions and scoring.	
3.1.3	Yes	Yes	NA	The information provided supports the conclusions and scoring.	Noted and thank you.
3.1.4	Yes	Yes	NA	The information provided supports the conclusions and scoring.	Noted and thank you.
3.2.1	Yes	Yes	NA	The information provided supports the conclusions and scoring.	Noted and thank you.



Performance Indicator	Has all the relevant information available been used to score this Indicator? (Yes/No)	Does the information and/or rationale used to score this Indicator support the given score? (Yes/No)	Will the condition(s) raised improve the fishery's performance to the SG80 level? (Yes/No/NA)	Justification Please support your answers by referring to specific scoring issues and any relevant documentation where possible. Please attach additional pages if necessary.	Conformity Assessment Body Response
3.2.2	Yes	No	NA	The score should be reduced somewhat. SG80b and SG100b require decision processes to respond in a timely manner. It is clear that the consensus approach for WCPFC can limit timely responses on some issues.	A comment was also made on this PI by the other peer reviewer, and in response the score has been adjusted to 90 (from 95) by confirming that the fishery does not meet the level of performance required by SI 100b. A note has been added on the timeliness of management processes to SI 80b, though, confirming that the fishery does meet the SG80 level of performance for that SI.
3.2.3	Yes	Yes	NA	The information provided supports the conclusions and scoring.	Noted and thank you.
3.2.4	Yes	Yes	NA	The information provided supports the conclusions and scoring.	Noted and thank you.
3.2.5	Yes	Yes	NA	The information provided supports the conclusions and scoring.	Noted and thank you.



Any Other Comments

Comments	Conformity Assessment Body Response
<p>Minor editorial comments:</p> <p>Page v, CR should refer to MSC Certification Requirements v1.2</p> <p>Page 34, reference to PFMC 2007 should be 2007a or 2007b</p> <p>Page 39, reference WCPFC 2010 and 2010b are the same reference (and referred to as WCPFC 2010a and WCPFC 2010b under P1.1.1 and P1.1.2 of the evaluation table).</p> <p>Page 55, “MST proxy” instead of “MSY proxy”.</p>	<p>Thank you- this has been corrected.</p> <p>Thank you- the reference should be PFMC 2007b.</p> <p>Thank you- these errors have been addressed and the reference listed as WCPFC (2010) only.</p> <p>Thank you- this typographical error has been corrected.</p>



Appendix 11: Stakeholder submission #1: MSC

www.msc.org

Marine Stewardship Council



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London EC1A 2DH
United Kingdom
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SUBJECT: MSC Review and Report on Compliance with the scheme requirements

Dear Rob Blyth-Skyrme

Please find below the results of our partial review of compliance with scheme requirements.

CAB	Intertek Moody Marine
Lead Auditor	Rob Blyth-Skyrme
Fishery Name	American Albacore Fishing Association Pacific albacore tuna - north
Document Reviewed	Public Comment Draft Report Posted

Ref	Type	Page	Requirement	Reference	Details	P1
3455	Major	32	CR-27.12.1.2	The CAB shall determine if the systems of tracking and tracing in the fishery are sufficient to make sure all fish and fish products identified and sold as certified by the fishery originate from the certified fishery. The CAB shall consider the following points and their associated risk for the integrity of certified products: The possibility of vessels fishing outside of the unit of certification.	The section of the report does not make it clear which vessels are part of the unit of certification, or provide either a list or the eligibility criteria	

3456	Major	32	CR-27.12.1.5	The CAB shall determine if the systems of tracking and tracing in the fishery are sufficient to make sure all fish and fish products identified and sold as certified by the fishery originate from the certified fishery. The CAB shall consider the following points and their associated risk for the integrity of certified products: Any transshipment activities taking place.	The report does not make it clear whether there is transshipment activity taking place within the fishery, and if so what the management and mitigation of risks presented are.	
3459	Major	103	CR-C13.2.3.2c	To achieve harmonisation, CABs shall undertake the following key activities: The achievement of consistent conclusions with respect to evaluation, scoring and conditions.	Condition timelines are not harmonized with overlapping fisheries, and any differences are not clearly justified. Clear rationale should be provided in the harmonization sections of the report to justify differences in condition timelines with overlapping fisheries.	
3460	Major	103	CR-27.11.2	The CAB shall require the client to prepare a client action plan that includes the information as outlined.	The client action plan does not include how the CAB will assess outcomes and milestones in each subsequent surveillance or assessment (27.11.2.5). Wording should be explicit that appropriate harvest control rules have been adopted within the specified timeframe, e.g. "Evidence should be provided that an appropriate harvest control rule for South Pacific albacore tuna HAS BEEN ADOPTED..."	
3461	Guidance		GCR-GCB4.0.2	'Governance and Policy' captures the broad, high-level context of the fishery management system within which the fishery under assessment is found. Performance elements within this component include: The legal and/or customary framework that overarches the fishery, and possibly other fisheries under the same management framework. The consultation processes and policies. The articulation of the roles and responsibilities of people and organizations within the overarching management system. Other overarching policies supporting fisheries management.	For these PIs, the team has considered both international and national management. The focus of these PIs should be at the broader management level to ensure that scores reflect the appropriate governance focus for this component.	3.1.1, 3.1.2, 3.1.3, 3.1.4



www.msc.org			Marine Stewardship Council		
3462	Guidance	GCR-GCB4.0.3	'Fishery Specific Management System' focuses the team on the management system directly applied to the fishery undergoing assessment. PIs under this component consider: A. The fishery-specific management objectives (i.e. fishery management objectives for the fishery under assessment, specifically). B. The decision-making processes in the relevant fishery. C. The fishery's compliance and enforcement system and implementation. D. Research planning and monitoring. E. Evaluation of the performance of the fishery's management system.	For these PIs, the team has considered both international and domestic management. The focus of these PIs should be at the fishery-specific management level to ensure that scores reflect the appropriate governance focus for this component.	3.2.1, 3.2.2, 3.2.3, 3.2.4, 3.2.5

This report is provided for action by the CAB and ASI in order to improve consistency with the MSC scheme requirements; MSC does not review all work products submitted by Conformity Assessment Bodies and this review should not be considered a checking service. If any clarification is required, please contact Maylynn Nunn on +61 2 9524 8400 for more information.

Best regards,
 Dan Hoggarth
 Fisheries Oversight Director
 Marine Stewardship Council

cc: Accreditation Services International



MSC stakeholder comments: Intertek Moody Marine response

MSC Reference	Issue Identified	IMM Response
3455	The need to state eligibility criteria and/or to provide a list of eligible vessels.	Eligibility is attained through membership of AAFA- this is now made clear in Section 5.3 of the report. A full list of current AAFA member vessels is also now provided in Appendix 14 at Table 15.
3456	The occurrence or otherwise of transshipping.	Transshipment is a traditional but uncommon practice in the US troll/jig and pole & line albacore fishery in the North and South Pacific. The IATTC and WCPFC allow transshipment to occur in the pole and troll fishery, but US albacore vessels are required to document and report transshipment events to enable monitoring. NMFS does not publish regular reports on the level of transshipment activity but it is understood that the activity is infrequent, with an average of 49 transshipments per year across the entire US albacore troll fleet in WCPFC Convention waters from 1990 – 2004, and with no transshipments reported in that fleet since 2004 (NMFS 2012b). From 2013, 100% observer coverage of any transshipments in pole and troll vessels will be required when operating in WCPFC waters (McTee 2011). It may be noted that the McTee (2011) report made no recommendations with respect to changes in transshipping requirements for albacore pole and troll fisheries. Summary details have been added to Section 5.2.
3459	Condition timelines are not harmonised and any differences are not justified.	<p>A new section has been added to Section 6.3, providing a justification for the full 4 year timeline on the AAFA conditions. This reads:</p> <p><i>“It is noted that the MSC requires that assessment outcomes (i.e., evaluation, scoring and conditions) are harmonised between overlapping fisheries so that consistent conclusions are achieved (MSC CR CI 3.2.3.2c). The overlapping fisheries are the WFOA and CHMSF North Pacific albacore troll/jig fisheries, and the New Zealand albacore troll fishery. The assessment team contends that the AAFA outcomes are consistent with the Conditions placed on the New Zealand fishery (i.e., reference points and a harvest control rule must be adopted in order for the Conditions to be closed out). However, on timelines, the New Zealand fishery was certified in May 2011, and their conditions are scheduled to be closed in 2015 (i.e. in less than 3 years time). It is considered that the AAFA fishery justifies a full four years to meet their Conditions because of the need to engage two RFMOs (WCPFC and IATTC) rather than the single RFMO (WCPFC) that the New Zealand fishery must engage. On this basis, the AAFA assessment team accepts a</i></p>



		<p><i>four year timeline to close the two Conditions. It may also be noted that the single Condition on the WFOA and CHMSF fisheries was introduced before guidance requiring that Conditions are time-bound and outcome focused was provided. As such, the Condition on those fisheries is not considered valuable for harmonization purposes.”</i></p>
<p>3460</p>	<p>The Client Action Plan does not include details on how the CAB will assess outcomes and milestones against conditions.</p>	<p>The assessment report notes against each condition (this example from Condition 1): <i>“This condition requires action to be taken by a body other than AAFA, with the required outcome being that the RFMOs adopt appropriate reference points (or measures/surrogates with similar intent) for South Pacific albacore. This will come about through political and management dialogue between country representatives, rather than through a simple series of steps that can be agreed prior to certification.”</i></p> <p>The range of actions that AAFA might undertake to meet their two conditions on each fishery include attending meetings, writing letters, making presentations and working to attain political and technical support for proposals and positions. While the actions and milestones are not highly specific at years 1 and 2, we feel that it is not feasible to set arbitrary requirements for numbers of letters sent, meetings attended or proposals presented. Nevertheless, AAFA’s efforts will be assessed as noted in the report through their commitment to <i>“...work actively through the FMCs and the US RFMO delegations to promote the development and determination of (for example) appropriate target and limit reference points...”</i> and to <i>“...report on efforts to explore appropriate opportunities with other tuna fisheries, associations, or organizations with complimentary objectives”</i>. These commitments link to the milestones specified which require at the 1st and 2nd year audits that <i>“Evidence should be provided of AAFA’s promotion through the FMCs and US RFMO Delegations of (in this example) appropriate target and limit reference points...”</i></p> <p>In moving forward, though, and in order to tie the Client Action Plan more clearly to the milestones, the client has now added text to the Client Action Plan at years 3 and 4 to show how the outcomes can be assessed, as below:</p> <p>Year 3: <i>“Evidence of the work will be provided in the form of AAFA letters to the relevant US regional managers and RFMO Delegations, and then evidence of the outcome of the RFMOs considering appropriate target and limit reference points (or measures or surrogates with similar intent or outcome) will be provided in the form of RFMO meeting papers and minutes.”</i></p> <p>Year 4: <i>“Evidence of the work will be provided in the form of AAFA letters to the relevant US regional</i></p>



		<i>managers and RFMO Delegations, and then evidence of the outcome of the RFMOs adopting appropriate target and limit reference points (or measures or surrogates with similar intent or outcome) will be provided in the form of RFMO meeting papers and minutes.”</i>
3461	Governance and Policy covers the broad, high level policy context, but the assessment has included consideration of national management.	The guidance is noted, thank you. The assessment team attempted to distinguish between the national and international management context at each step, and to draw out the relevant information for scoring.
3462	Fishery specific management covers the species-specific management context, but the assessment has included consideration of international management.	



Appendix 12: Stakeholder submissions #2- WWF



WWF *for a living planet*

WWF Smart Fishing Initiative
(Global Fisheries Programme),
International WWF Centre for Marine Conservation
Mönckebergstraße 27
20095 Hamburg
Germany

To Rob Blythe-Skyrme

From Bill Fox WWF US
Daniel Suddaby WWF - Smart Fishing Initiative

CC Allison Cross WWF US

Subject WWF Comments to the Public Consultation Draft Reports for the American Albacore Fishing Association North Pacific Albacore Pole & Line and Troll/Jig Fishery and South Pacific Albacore Troll/Jig Fishery)

Date 12 November 2012

Dear Rob:

WWF is committed to improving the sustainability of tuna fisheries globally. We commend the American Albacore Fishing Association (AAFA) for being the first tuna fishery to obtain MSC certification and hope that it can achieve recertification.

However, WWF believes that AAFA's conditions on the North and South Pacific fisheries during the initial MSC certificate period were not fully met, as we have been able to obtain no evidence that AAFA actively engaged with the appropriate players to make progress on either a) maintaining the stock at or above a precautionary reference limit (North Pacific unit of certification (UoC)) or b) the



development and clear documentation of decision rules and appropriate harvest control mechanisms in the fishery (South Pacific UoC).

IMM Response: Both AAFA fisheries

To the assessment team's knowledge, and based on evidence as provided by AAFA during the course of the existing fishery certifications, AAFA is actively engaged with appropriate players through regularly attendance at meetings and through frequent communication with US regional fishery managers and US representatives on the international management bodies.

Further details regarding the reassessment process and the Conditions that were set on the fisheries previously are provided against comments below.

In fact, at the IATTC meeting this past June, Canada proposed a management measure for North Pacific albacore that called for simply the reporting on the WCPFC's work on target and limit reference points and a harvest control rule. Representatives from the U.S. albacore fishing fleets that have been certified, with conditions, by the Marine Stewardship Council (MSC) were quiet when it was time for anyone to voice an opinion about the measure. The lack of support was puzzling since MSC certification requires target and limit reference points along with a clear harvest control rule. In fact, working toward implementing these management measures is one of the main conditions placed on the certifications of tuna fisheries by MSC assessments. But the U.S. albacore fleet representatives who attended never raised so much as a hand in support. They didn't stand or even ask their U.S. government representatives to, either. They actually opposed including the Canadian language to the U.S. Delegation. So in the end, the U.S. was silent. The measure didn't make it any further. We were surprised to witness the complete lack of support for a fundamental principle of responsible fisheries management, especially with representatives in the room that have every reason, and responsibility, to stand up and demand action be taken. The PNA, New Zealand, and Canadian governments with MSC certified tuna fisheries have exercised leadership at the RFMO level whereas AAFA has failed.

IMM Response: Both AAFA fisheries

It is noted that no member of the IMM assessment team was present during these IATTC discussions, and that there appears to be no minutes of the specific meeting referred to available on the IATTC website. It is also noted that the MSC fishery assessment process, and the assessment team for the AAFA fisheries, welcome and benefit from stakeholder input.

It is the assessment team's understanding of these events, though, that the Canadian proposals had not been discussed with US representatives prior to being presented, and that an initial analysis determined that the proposals for introducing a Harvest Control Rule had the potential to discriminate against fisheries specifically targeting albacore (e.g. the US pole and troll fishery) in comparison to fisheries that catch albacore as a bycatch, even if such bycatches comprised a significant proportion of the total catch in those fisheries or a significant proportion of the total catch of albacore. The assessment team understands that a specific concern was that, in the event that a Limit Reference Point was being approached, only fisheries targeting albacore would be required to reduce exploitation, whereas other fisheries that take significant quantities of albacore as a bycatch would remain unaffected. Limiting catches of just those fisheries nominally targeting albacore is unlikely to provide great benefit to albacore stocks, and could severely impact the long-term viability of the US pole and troll fishery.

Nevertheless, and irrespective of the measures put forward in June at the IATTC, the new conditions of certification as written for both AAFA fisheries require the introduction of reference points and a Harvest Control Rule by the fourth year of certification. Given the complexity and scale of this



requirement in the context of international management, it is the assessment team's expectation that AAFA will work with other bodies in order to meet the condition, in particular the US managers and representatives on international bodies, as well as other MSC-certified fisheries and stakeholders.

It seems counter that a fishery could be recommended for re-certification without having fulfilled its conditions during the initial certificate period, and WWF has concerns with the application of the MSC program by Moody Marine in this re-assessment. We feel that re-certification of this fishery without adequately applying the requirements set out by MSC will result in a negative consequence for the management and conservation of tuna in the Pacific Ocean and elsewhere.

IMM Response: North Pacific

As noted in the AAFA North Pacific albacore reassessment report, the single Condition of Certification placed on the fishery in the first certification period was closed out in 2009. At that time it was noted:

“AAFA has exhibited extensive, broad, and consistent efforts in promoting and supporting both domestic and international responsible management actions regarding the North Pacific albacore resource. The stock status has also been revised as being at high abundance. All elements of this Condition of Certification have therefore been met.”

No further Conditions were set against AAFA's North Pacific albacore fishery during the first certification period. As such, the fishery was deemed to be meeting the MSC standard at the point at which it entered into reassessment on September 16th 2011.

IMM Response: South Pacific

The Condition of Certification on the AAFA South Pacific albacore fishery was not closed out during the course of the existing certificate. However, as was noted in the South Pacific albacore reassessment report, the guidance as provided at Section 27.24.2.4 b of the MSC's CR was followed; this states:

“For fisheries with conditions written prior to the requirement for outcome-based conditions (2006), or against performance indicators in assessment trees which differ from those in the tree being used in the reassessment (NB- as is the case with the AAFA South Pacific albacore fishery):

ii) If the conditions are not appropriate to deliver SG80 outcomes in the reassessment tree, CABs shall consider what action is needed to deliver the outcome required at SG80 level, and evaluate whether this outcome has been achieved.

1) If the SG80 level has not been achieved, such conditions shall be rewritten against the reassessment tree following the requirements specified in 27.11, with a timeline for completion of less than one certification period.

The guidance has been followed for the reassessment of the AAFA South Pacific fishery, where two new conditions (Conditions 1 and 2) have been written to address the single, existing and still open condition. This approach is consistent with and permitted by the MSC's guidance.

We provide comments below with specific details on scoring, and believe that a stronger client action plan is necessary for continued certification of the fishery.

SCORING

Performance Indicator 1.1.2 Limit and target reference points are appropriate for the stock



The MSC Certification Requirements clearly define Reference Points as those set and used by management:

Biological reference points; Stock Status Reference Points used to define management action in response to stock status. (page A24 MSC Certification Requirements V1.2).

CB2.3.1 The team shall make a decision at SG80 if limit reference points set by management are above the level at which there is an appreciable risk of impairing reproductive capacity, and that target reference points are set at a level “consistent with BMSY”.

CB2.3.2 The team shall note that, for assessments using the default tree for Principle 1:

CB2.3.2.1 For the purposes of PI 1.1.2 or pre default tree PI equivalents the team shall interpret reference points as reference points used for managing the fishery— i.e. explicit or implicit points used by management as part of management procedures, management strategies or decision rules to trigger management action.

Reference points do not yet exist that are used by management. This Performance Indicator must be scored correctly against the reference points implemented and used by management. The 80 Scoring Issue A is therefore not met.

IMM Response: Both AAFA fisheries

NB. For clarity, the MSC defines reference points on page A51 of the Certification Requirements.

The approach taken in assessing both AAFA fisheries is consistent with the New Zealand albacore fishery that was certified in 2011, and the Fiji albacore fishery that is currently (November 2012) at Final Determination, although in both cases those fisheries were assessed as scoring 75 for this PI. The WFOA and CHMSF fisheries, certified in 2010, also scored 75 for this PI.

The assessment team considers that the score of 70 is appropriate for the AAFA fisheries for PI 1.1.2, and that a score any lower than 70 would be inappropriate based on the arguments made in the report and on the assessment of other MSC-certified fisheries. In fact, if any changes were to be made to the score, harmonisation would suggest that the score be raised to 75 by assessing the AAFA fisheries as meeting Scoring Issue 80C regarding target reference points.

Performance Indicator 1.2.1 There is a robust and precautionary harvest strategy in place

The MSC clearly states (GCB 2.5.1) that when scoring the performance of the harvest strategy, four Performance Indicators need to be assessed that consider:

- a. Overall performance of the harvest strategy*
- b. Key elements of the harvest strategy*
 - i. The control rules and tools in place*
 - ii. The information base and monitoring*
 - iii. The assessment method*

Harvest strategy guidance GCB2.5.2 states that *the four harvest strategy performance indicators (PIs) are expressed in relation to achieving outcomes; in particular, the harvest strategy shall be appropriate to achieving the management objectives expressed in the target and limit reference points.*

GCB2.5.4 states that PI 1.2.1 scores *the overall performance of the harvest strategy, particularly the way that the different elements work together to keep the stock at levels consistent with reference points.*

Currently, albacore catch is below MSY and current assessment results suggest that the North and South Pacific stocks are not overfished. However, there are no harvest control rules (HCRs) and no reference points, and it seems the MSC standard has been misinterpreted to give this fishery an unconditional pass for 1.2.1. Much of the scoring rationale for the harvest strategy is simply based on maintaining the status quo. Management systems with no defined actions or HCRs lack a critical aspect of precautionary management as they do not define the ‘action to be taken’ and cannot be responsive to the state of the stock.

IMM Response: Both AAFA fisheries

The minutes from the 15-18th May 2012 Scientific Meeting of the IATTC (<http://www.iattc.org/Meetings/Meetings2012/May/PDFs/SAC-03-Meeting-report.pdf>) noted.

“The Working Group concluded that overfishing likely is not occurring and that the stock likely is not in an overfished condition (e.g., $F_{20-50\%} < 1.0$), although biomass-based reference points have not been established for this stock. The current assessment results confirm that F has declined relative to the 2006 assessment and that this conclusion is robust to the different plausible assumptions tested by the Working Group. The lower F found by this assessment is consistent with the intent of the previous (2006) Working Group recommendation.”

Based on information provided in the AAFA fishery reassessment reports related to management measures to stabilise/prevent fishing effort exceeding existing levels, and confirmed in the North Pacific fishery through the minutes from the IATTC meeting as shown above, and in the South Pacific fishery through the finding that since the 2004-2005 reference period, catches in the troll/jig fishery have changed to a negligible amount while there has also been a negligible change in the impact of the troll/jig fishery on the total albacore stock biomass and spawning potential (Hoyle 2011), the assessment team considers that the score of 80 is appropriate for this PI in both AAFA fisheries. It is also consistent with the New Zealand and WFOA albacore fisheries which were certified previously and which were scored 80 and 95 for this PI respectively.

Additionally, the stock being above BMSY is given as evidence of an effective harvest strategy for an unconditional pass. We argue that stock status is not ‘evidence’ that a harvest strategy is achieving its objectives. The 2011 stock assessment concluded that the level of fishing mortality is higher than many commonly-used reference points that are used as proxies for FMSY.

Therefore, **this fishery does not meet SG80 for 1.2.1 and a condition must be put in place that links to reference points/explicit biomass targets and defines action to be taken in response to declining stocks.**

IMM Response: Both AAFA fisheries

The assessment team disagrees with the thrust of these comments. While a healthy stock status does not provide conclusive ‘proof’ that a harvest strategy is working, the fact that the North and South Pacific albacore stocks have been consistently healthy over long periods of time does provide evidence that the harvest strategy is working. Conversely, a consistently poor stock status would almost certainly be taken as evidence of the failure of a harvest strategy, but this is not the case in these fisheries.

The action as recommended by the WWF with respect to a Condition is then addressed through the introduction of a condition under PI 1.2.2 covering Harvest Control Rules.



CONDITION SETTING

Performance Indicator 1.1.2 Limit and Target reference points are appropriate for the stock

This condition must be made more explicit and include language requiring appropriate, precautionary, and binding limit and target reference points to have been adopted by **both the IATTC and WCPFC** that are consistent with the RFMO management objectives and the best available science:

Condition

By the end of the 2016 Commission meetings, appropriately precautionary binding limit and target (and possibly trigger) reference points have been adopted by the IATTC and WCPFC, which are consistent with the IATTC and WCPFC management objectives and best available science.

IMM Response: Both AAFA fisheries

The Condition as set against this PI requires the MSC SG80 standard to be achieved, and adopts text taken directly from the MSC's own language for consistency and in accordance with MSC CR 27.11.1.2 (*The CAB should draft conditions to follow the narrative or metric form of the PISGs used in the final tree*). The additional language proposed here, specifying precautionary reference points and possibly including trigger reference points, is additional to the MSC requirements. While such language is aspirational and may be desirable, is not required for a fishery to meet the MSC standard. As such, the proposed language is not accepted by the assessment team.

Performance Indicator 1.2.1 There is a robust and precautionary harvest strategy in place

Condition

By the end of the 2015 Commission meetings, the elements of a harvest strategy, including appropriately precautionary binding limit and target (and possibly trigger) reference points, risk levels and other management objectives for the harvest strategy, and harvest control rules for skipjack tuna, have been adopted by the IATTC and WCPFC, which are consistent with the IATTC and WCPFC management objectives and best available science.

IMM Response: Both AAFA fisheries

Although the proposed language above refers to skipjack tuna, whereas of course the AAFA fisheries target albacore tuna, it is assumed that this was simply a typographical error.

In any case, and as noted in earlier comments, the assessment team considers that the AAFA fisheries meet the SG80 level of performance for this PI. As such, no condition is deemed necessary.

Performance Indicator 1.2.2 There is a well-defined and effective harvest control rule in place

This condition must be made more explicit and include language requiring the formal adoption of harvest control rules by **both** the IATTC and WCPFC that are well defined, consistent with the harvest strategy, ensure that the exploitation rate is reduced as limit reference points are approached, and take into account the main uncertainties, and available evidence must indicate that the tools in use are appropriate and effective in achieving the exploitation levels required under the harvest control rules.

Condition



By the end of the 2015 Commission meetings, appropriately precautionary, well-defined, and binding harvest control rules for North and South Pacific albacore tuna have been adopted by the IATTC and WCPFC, which are consistent with the IATTC and WCPFC management objectives and best available science.

IMM Response: Both AAFA fisheries

Again, the condition as set against this PI requires the MSC SG80 standard to be achieved, and adopts text taken directly from the MSC's own language for consistency and in accordance with MSC CR 27.11.1.2. The additional language proposed here, specifying precautionary, binding harvest control rules, is additional to the requirements. While such language is again clearly aspirational, it is not required for a fishery to meet the MSC standard. As such, the proposal is not accepted by the assessment team.

MILESTONES

Milestones must also be made more explicit, as required by the MSC annual milestones must be outcomes. The milestones defined for years 1-3 of AAFA's conditions do not contain outcomes but processes. Engagement is not an outcome; proposing a measure at the WCPFC is an outcome, getting six votes is an outcome.

WWF believes the annual milestones in achieving its conditions should at a minimum be (for each condition and for each unit of certification):

- a) By the end of the first year of the certificate period, AAFA will:
 - i. have actively sought support from other CPCs (e.g. either directly or through industry/market pressure);
 - ii. provide evidence of having garnered support for establishment of target and limit reference points, determined from AAFA and other CPCs vocalizing their support to the SC of each RFMO; evidence of the success of the lobbying will be the SCs recommending AAFA's suggestions to the Commissions;
 - iii. have actively encouraged advancement of the Management Strategy Evaluation process; evidence of this is embedded in the actions associated with i and ii above.

- b) By the end of the second year of the certificate period, AAFA will:
 - i. Have actively and thoroughly pursued adoption by both RFMOs of binding target and revised limit reference points, and made requests regarding interim trigger points and harvest control rules and risk levels to the SCs;
 - ii. provide evidence of having garnered support for the establishment of target and limit reference points, determined from AAFA and other CPCs vocalizing their support to the SC of each RFMO; evidence of the success of the lobbying will be the SCs recommending AAFA's suggestions to the Commissions and the Commissions adopting the SCs' recommendations.
 - iii. have actively encouraged advancement of the Management Strategy Evaluation process; evidence of this is embedded in the actions associated with i and ii above.

- c) By the end of the third year of the certificate period, the IATTC and WCPFC will have agreed to finalization of the Management Strategy Evaluation process in time for consideration of the result at the 2015 Commission meetings.

- d) By the end of the fourth year of the certificate period, the IATTC and WCPFC will have each definitely adopted binding appropriately precautionary scientifically-based target, limit and trigger reference points, risk levels and other management objectives for the harvest strategy, and harvest control rules for albacore tuna, and the Management Strategy Evaluation will have been completed and the results adopted by both Commissions.

IMM Response: Both AAFA fisheries

The milestone as set in year 3 requires that AAFA demonstrate that the RFMOs or their designated bodies have expressly considered appropriate reference points (or measures/surrogates with similar intent) (Condition 1) or a harvest control rule (Condition 2), while the year 4 milestone requires that AAFA demonstrate that the RFMOs have adopted such reference points (Condition 1) or a harvest control rule (Condition 2). These are clear, measurable and time bound objectives that leave AAFA very little flexibility for interpretation and will result in the SG80 level of performance being met. Nevertheless, and in recognition of comments received, language regarding outcomes has now been added to the Client Action Plan at year 3 and 4 in order to tie the milestones and action plan together more closely.

It is less easy or, in fact, desirable to be specific on the year 1 and 2 milestones, as the process at that stage could include a wide range of processes and activities through which progression towards the introduction of reference points and a harvest control rule may occur. This is why we noted the following against each of the sections entitled ‘Consultation on Condition’, which we continue to believe applies:

“This condition requires action to be taken by a body other than AAFA, with the required outcome being that the RFMOs adopt appropriate reference points (or measures/surrogates with similar intent) for South Pacific albacore. This will come about through political and management dialogue between country representatives, rather than through a simple series of steps that can be agreed prior to certification.”

As noted above, there are clear end points specified in the Conditions and through the milestones. The assessment team certainly considers that AAFA will need to work hard to meet these Conditions within the timescale specified, including through working with other bodies and stakeholders, but we feel that being prescriptive for the early stages has the potential to be both unhelpful and counter-productive.

Action Plan

The action plan for recertification must be strengthened with fully defined, measurable activities.

The current client action plan does not provide enough detail about how AAFA and the US government will ensure that conditions are met within the certificate period. The outcomes defined are not measurable improvements, but are promotion of a concept. In order to be compliant with the MSC requirements (27.11.1.4), the conditions shall be measurable improvements and an outcome shall be achieved at interim milestones. The action plan must clearly state actions to be undertaken and evidence to be provided regarding progress toward meeting the condition (e.g., working actively through PFMC and US delegations to the IATTC and WCPFC to promote the adoption of reference points and a harvest control rule gives no indication of what actions AAFA is actually going to take and is not measurable).



To achieve each of the conditions and following process steps, the US Government (and possibly its tuna fishing industry) will need to work intersessionally with other IATTC and WCPFC Contracting Parties and Cooperating Non-Contracting Parties (CPCs). Intersessional work will include attaining political and technical support for developing and obtaining agreement to proposals and positions. The US may wish to submit joint proposals for additional weight, or have another CPCs submit and present a developed proposal instead of themselves. To the extent it is able, and has an active relationship, WWF will encourage support by other CPCs.

IMM Response: Both AAFA fisheries

The assessment team agrees with the WWF that AAFA will need to work proactively and intersessionally with the managers and other stakeholders of the albacore fishery in order to meet the conditions, and therefore the MSC standard, within the designated time frame. The range of actions that AAFA might undertake to make this happen include attending meetings, writing letters, making presentations and working to attain political and technical support for proposals and positions. We take this as being agreed by AAFA through their commitment to “...work actively through the FMCs and the US RFMO delegations to promote the development and determination of (for example) appropriate target and limit reference points...” and to “...report on efforts to explore appropriate opportunities with other tuna fisheries, associations, or organizations with complimentary objectives”.

While these actions are not highly specific at years 1 and 2, we feel that it is not feasible to set arbitrary requirements for numbers of letters sent, meetings attended or proposals presented. However, the actions can be assessed through the milestones which require at the 1st and 2nd year audits that “Evidence should be provided of AAFA’s promotion through the FMCs and US RFMO Delegations of (for example) appropriate target and limit reference points...”, at the 3rd audit that “Evidence of consideration by the relevant RFMOs of appropriate target and limit reference points (or measures/surrogates with similar intent) for South Pacific albacore tuna should be provided” and at the 4th audit that “Evidence should be provided that appropriate target and limit reference points (or measures/surrogates with similar intent) for South Pacific albacore tuna are adopted by the relevant RFMOs”.

The assessment team considers that the key point is that reference points and a harvest control rule are introduced by year 4 in order to meet the two conditions on each fishery. This can and will be assessed by the obvious route of being able to review progress at the RFMOs. As noted previously, though language regarding outcomes has now been added to the Client Action Plan at year 3 and 4 in order to tie the milestones and action plan together more closely.

Consultation

Conditions 1 and 2 require ultimate agreement and implementation by the IATTC and WCPFC. It does not appear that the RFMO secretariats or individual CPCs were consulted. However, the MSC requirements (27.11.3) are clear – both IATTC and WCPFC shall have been consulted and the assessment team satisfied that the conditions are both achievable and realistic. The support letter from NMFS gives no indication that the US government itself will help fulfill the conditions, and in any case support from the US alone is not enough.

WWF believes that explicit commitment by the parties whose support is needed to address the conditions (i.e. IATTC, WCPFC, and NMFS) in writing is necessary and should be included in the certification report as evidence that funding/resources will be in place to address conditions. If the CAB cannot find evidence to show that funding and/or resources are, or will be, in place to address conditions, certification should not be awarded (27.11.4).



IMM Response: Both AAFA fisheries

As noted by the WWF above, the MSC requirements for consultation are laid out at 27.11.3. This states: *“The CAB shall not accept a client action plan if the client is relying upon the involvement, funding and /or resources of other entities ... without: consulting with those entities when setting conditions...”*

However, the RFMO Secretariats service the management process rather than actually manage the international fisheries, and so consulting the Secretariats could not result in any commitments to management change being gained. WWF’s proposal with respect to individual CPCs would then require AAFA to engage with international Delegations, side-stepping the US Delegation. We believe that requiring a direct approach from AAFA is unreasonable, unfeasible and unlikely to be successful, while also being incompatible with the international engagement requirements specified by the US at the RFMOs. As such, and following the precedent set through other internationally-managed MSC-certified fisheries (e.g., New Zealand albacore tuna, Canadian longline swordfish), engagement with the national management representatives has been deemed adequate to meet the requirements.

With regards to the NMFS support letter, the AAFA fishery assessment reports state that *“IMM is satisfied that the PFMC and US Delegations to the RFMOs are engaged in improving the management of the fishery, that the necessary research budgets are in place to address the work, and that meetings will be scheduled and held as required.”* As such, and although certainly welcome, the NMFS letter is in addition to any requirement for *“evidence to show that funding and/or resources are, or will be, in place to address conditions”* (MSC CR 27.11.4).

WWF fully supports AAFA’s admirable steps towards sustainability. However, we feel that certification of the fishery can only be granted upon fully meeting the MSC’s Certification Requirements. We have no doubt that, with some additional attention given to the areas of concern expressed by WWF and other stakeholders during the assessment, this fishery will reach the level of sustainability that it has been working so hard to achieve.

Thank you for the opportunity to comment on the assessment process for this fishery.

Sincerely,

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Appendix 13: Surveillance Frequency

(REQUIRED FOR THE PCR ONLY)

The report shall include a completed fishery surveillance plan table using the results from assessments described in CR 27.22.1

Table A4: Fishery Surveillance Plan

Score from CR Table C3	Surveillance Category	Year 1	Year 2	Year 3	Year 4
[e.g. 2 or more]	[e.g. Normal Surveillance]	[e.g. On-site surveillance audit]	[e.g. On-site surveillance audit]	[e.g. On-site surveillance audit]	[e.g. On-site surveillance audit & recertification site visit]

Appendix 14: AAFA member vessels and landing stations

As of November 2012, the AAFA membership stands at 59 vessels. These are listed in Table 15, below. The AAFA unloading stations for 2012 are listed in Table 16, also below.

Table 15: AAFA membership in November 2012 (<http://www.americanalbacore.com/members>).

AAFA member vessel	AAFA member vessel	AAFA member vessel	AAFA member vessel	AAFA member vessel
F/V Aleutian Storm	F/V Deenie Lynn	F/V Karen Michelle	F/V Ocean Joy	F/V Sea Chase
F/V Ali J	F/V DJ	F/V Kilchis	F/V Orion	F/V Sea Haven
F/V Alliance	F/V Donita	F/V Kjirstin Nicole	F/V Pacific Marit	F/V Sea Sprit
F/V Amylyn	F/V Donna Lou	F/V Kranken	F/V Pacific Pride	F/V Seawind
F/V Ana Maria	F/V Four C's	F/V Kristy	F/V Phantom	F/V Sidewinder
F/V Betty H	F/V Gladnik	F/V Lydorein	F/V Resolution	F/V Steel Fin II
F/V Dalena	F/V Her Grace	F/V Midori	F/V Richard H	F/V Sugarfoot
F/V Billie Marie II	F/V Janice Ann	F/V Millie G	F/V Robin Ann	F/V Suki
F/V Blue Dolphin	F/V Jody H	F/V Miss Ann	F/V Rose Mar	F/V Tombo
F/V Bountiful	F/V Judy	F/V My Lee	F/V Rose Marie	F/V Tommy John
F/V Captain Banjo	F/V Judy S	F/V Nicole Marie	F/V Royal Dawn	F/V Two Fishers
F/V Charlotte V	F/V Karen Jan	F/V Nightwind	F/V Scandia	

Table 16: AAFA unloading stations for 2012 (<http://www.americanalbacore.com/unloading-stations>).

Number	Landing Station
1	Bornstein Seafood
2	Caito Fisheries
3	Coos Bay Trawlers Marketing Division
4	Driscoll's Wharf
5	Ilwaco Landing
6	Jolly Roger Seafood
7	Pacific Seafood
8	Trident Seafoods
9	Westport Seafood



Appendix 15: Client Agreement and AAFA member vessels **(REQUIRED FOR PCR)**

The report shall include confirmation from the CAB that the Client has accepted the PCR. This may be a statement from the CAB, or a signature or statement from the client.

(Reference: CR: 27.19.2)



Appendix 16: Objections Process

(REQUIRED FOR THE PCR IN ASSESSMENTS WHERE AN OBJECTION WAS RAISED AND ACCEPTED BY AN INDEPENDENT ADJUDICATOR)

The report shall include all written decisions arising from an objection.

(Reference: CR 27.19.1)