



Available Scientific Information in Considering the Sufficiency of Existing Fishing Regulations in the Pacific Remote Islands

Fisheries Facts

- Principal tuna species in relevant tuna fisheries within the western and central Pacific Ocean (WCPO) are *not overfished nor experiencing overfishing* (yellowfin, bigeye, skipjack, albacore). This is based on internationally-accepted best scientific information available. (<https://www.wcpfc.int/current-stock-status-and-advice>)
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- Depths at which pelagic fishing (longline, hand-line, purse seine) occurs
 - Purse seine nets are up to 200 200 m in depth
<https://www.fisheries.noaa.gov/national/bycatch/fishing-gear-purse-seines>
 - Deep-set longline fishes 300-400 meters
<https://www.fisheries.noaa.gov/national/marine-mammal-protection/hawaii-deep-set-longline-fishery-mmpa-list-fisheries>
 - Shallow set is down to 90-100 m
<https://www.fisheries.noaa.gov/national/marine-mammal-protection/hawaii-shallow-set-longline-fishery-mmpa-list-fisheries>
- Non-commercial/artisanal fishing that occurs, or may occur in the future, in the non-monument PRIA proposed sanctuary areas
 - There is also some non-commercial fishing activity within portions of the PRIA, namely at Wake Island and Palmyra Atoll. There are no resident populations at Howland Island, Baker Island, Johnston Atoll, or Jarvis Island, and fishing activity at these locations is likely minimal. At Palmyra Atoll, an island privately owned by The Nature Conservancy, small boats are operated within the lagoon for trolling. There are several craft used for non-commercial fishing at the military base on Wake Island, including two landing craft and two small vessels.
- Enforcement of fishery regulations
 - The US Coast Guard and NOAA Office of Law Enforcement monitor the PRIA and enforce fishery regulations. USCG monitors the mandatory Vessel Monitoring Systems (VMS) installed on the US fleet and NOAA OLE may do dockside inspections. The USCG will provide enforcement at sea and by air with their resources as well.

Science on closing areas to fishing

- A 2020 study by Gilman et al (2020) showed that the existing Pacific Remote Island Marine National Monument, including Johnston Atoll, had no discernible conservation benefit to biodiversity of highly migratory species.
<https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0235129>
- Nearby large MPA in Kiribati waters with significant exploitation history was found to have no conservation benefit to tropical tunas (Hampton et al, 2023)
<https://www.frontiersin.org/articles/10.3389/fmars.2022.1060943/full>

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- Protecting against abatable threats: Kuempel et al (2019) states that areas with the highest level of protection are often the ones with the least abatable threats to biodiversity and strongest governance structures (like existing US fishery management laws) and warns against making MPAs out of political convenience than addressing threats. These included the MPAs already in the U.S. Pacific EEZs. (<https://conbio.onlinelibrary.wiley.com/doi/full/10.1111/cobi.13340>)
- Conventional wisdom of large MPAs vs applicability in ‘blue water ecosystems’: Hilborn et al (2022) found that protection of biodiversity using static large closures in open ocean blue water ecosystems is not proven to be more effective than current input/output fishery management controls or any other area-based management tool (<https://onlinelibrary.wiley.com/doi/full/10.1111/faf.12629>).
- Pons et al (2022) used case studies with real verifiable data to demonstrate existing fishery management tools and dynamic area-based management tools are significantly more effective at protecting biodiversity than large ‘set it and forget it’ closed areas. (<https://www.pnas.org/doi/10.1073/pnas.2114508119>)
- Hampton et al (2023) paper assumes fishing effort displaced outside of an MPA makes this all an exercise in futility. It is not limiting total fishing effort or capacity. Rather shifting effort elsewhere. Hampton also looked at closing 30% of the WCPO and found the same outcome - no significant benefit.
- Transferred effects: reducing fishing access to U.S. and opportunities for well-regulated and well-managed U.S. fisheries leads to U.S. production being supplanted by less-regulated foreign fisheries. This in turn leads to increased bycatch and increased interactions with protected species. This was demonstrated by the Hawaii-based swordfish fishery, which Chan and Pan (2012) found that increased production of the Hawaii-based fishery reduced sea turtle interactions by replacing foreign production (<https://repository.library.noaa.gov/view/noaa/4040>)

Fishing Communities

- The backbone of American Samoa’s economy depends on the viability of a single StarKist cannery and supply from U.S.-flagged tuna purse seiners. This local industry supports 5,000 jobs in the territory with an estimated workforce of 18,000 people where over 50% of the population is below the poverty line.
- Closing more U.S. waters to tuna fisheries forces fishing activities on the high seas where they are limited in fishing access under strict Western and Central Pacific Fisheries Commission (WCPFC) regulations. It also forces U.S. vessels to pay exorbitant fees to operate within the EEZ of Pacific Island nations. This will drive more vessels to either re-flag from the US and/or operate in the eastern Pacific where they will be unlikely to offload in American Samoa. This will lead to the collapse of the local tuna industry. The fleet has already diminished from 38 vessels to 13 since 2018.
- The burden of a national conservation aspiration falls on the shoulders of underserved Pacific Island communities: the Pacific Islands already account for at least 90% of the national ‘30 x 30’ aspiration under the *America the Beautiful* agenda according to Sullivan-Stack et al (2022) (<https://www.frontiersin.org/articles/10.3389/fmars.2022.849927/full>)