

**American Bluefin Tuna Association
Blue Water Fishermen's Association**

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Mr. Tom Strickland, Assistant Secretary
Department of Interior
U.S. Fish and Wildlife Service
Sent by Email and Fax

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Dear Mr. Strickland:

I represent, along with an intense, almost entirely volunteer network, a group of concerned citizens who fish for and/or make a serious portion of their annual income from catches of bluefin tuna. In addition to the pursuits of commercial fishermen many of these individuals and groups also provide recreational pleasure on charter vessels to millions of American taxpayers attempting to catch this magnificent creature (please see attached photo to electronic transmission of this letter).

Our constituency spans the range of any contemplated fishing technique for small or giant bluefin tuna including the use of recreational and commercial means from Maine to Texas. These fishing methods include rod and reel, handlines, harpoon, pelagic longline, purse seines and minimal incidental catches by trawl nets fishing primarily looking to catch mackerel, squid and herring.

Prior to the commencement of the CITES meeting our group (with limited financial resources) conducted a grassroots campaign to achieve a number of goals. The first goal was to collect and provide factual and technical information that could be of use to those whom we wished to inform and be guided by an accurate understanding of this complex internationally shared highly migratory species. Secondly, our objective was to utilize this information and mobilize our network of supporters to garner the support of more than 20 of the most important bipartisan fishery knowledgeable Congressmen and Senators urging President Obama's Administration to oppose any CITES listing for Atlantic bluefin tuna.

It was with profound astonishment and incredible regret that I came to understand that you and obviously Secretary Salazar chose to ignore the expertise of these elected American officials who represent millions of citizens, taxpayers and more importantly to some, past and future voters. These aforementioned individuals possess the most experience and credentials on the bluefin issue at hand and recognized the misguided intention to make bluefin the lead U.S./PEW objective supporting the Monaco proposal for CITES Appendix 1 listing which would have banned all international trade and irreparably damaged an already significantly reduced, compliant and world-wide ecosystem friendly American fishery. There can be no debate here, just inquire within NOAA and NOAA's Fish Watch.

We are aware that the Pew Charitable Trust Foundation lobbied your Agency intensively, to the point of hiring Dr. Susan Lieberman, Director of the U.S. Fish and Wildlife Service Scientific Authority, in their attempt to secure a CITES I listing. Unlimited funds apparently allow such exorbitant lobbying luxuries.

We recognized early the seriousness of the CITES battle having been to Kyoto in 1992. The Japanese call it the "CITES JAIL", i.e. once a species is listed it simply does not come off the international trade ban list. With their seemingly bottomless dollar pool, PEW has hired another full time anti-commercial fishery person to attempt to shut down the Gulf of Mexico pelagic fishery which has an exceptionally marginal interaction with giant tuna especially with the introduction of the "weak hook". Pew's clearly bitter reaction to their CITES humiliating repudiation of their simplistic understanding and ignorance of the most recent science relevant to the subject species has been to announce a domestic campaign to further hurt American fishermen, American tuna markets, Americans health and life span by scaring them from eating seafood. You are sure you want to continue to carry their water further? Your post CITES press release certainly suggest this to be the case.

The minimal interaction with bluefin tuna in the Gulf of Mexico by longline gear is especially a reality after cooperative NOAA and pelagic industry research to develop a "weak hook" that allows giant bluefins to simply straighten out the hook upon the first run from the fishing gear. The new hook also has the added benefit of increasing catching of the targeted yellowfin tuna, a healthy stock and swordfish: a species the U.S. has rebuilt to a spawning stock level above the level necessary to extract the maximum sustainable catches and yield. The success of the cooperative research the U.S. pelagic longline industry with NOAA are famous for has a significant portion of the small fleet volunteering to use the "weak hook" which we will support be made mandatory in appropriate ocean locations.

Now, Mr. Strickland what you and your Agency and Pew have done is a **very, very bad thing at CITES**, particularly in light of the humiliating defeat the United States experienced. Which, mind you, most reasonably knowledgeable fishery professionals, including high level NOAA staff, likely warned you about or knew was almost a certain outcome given the latest stock assessment estimating more than 5 million free swimming bluefin from Argentina to the southern boundaries of the Arctic Circle, some swimming at depths greater than 6,000 feet (evidenced scientifically by electronic satellite tagging -- did Sue Lieberman and others lobbying conveniently leave out this little fact in their conversations with you?) well beyond the most sophisticated fishing gear commonly used by any country.

But, of course, the most compelling reason to reject a CITES listing was the general acceptance that CITES has neither the technical competence or administrative infrastructure or financial resources to effectively implement the listing which would have banned all international trade in this species likely for many, many generations to come. No doubt, you heard this factual protestation in your chair in Doha repeatedly until the Chairman continuously admonished delegates to not again waste valuable

time making the obvious accepted point. And then there was the "similar in appearance" problem totally ignored by ENGOS for the purpose of advancing the listing but ignoring the ultimate trade problem with, at least bigeye and yellowfin tuna.

You, and your advisors (e.g. Susan Lieberman, PEW), have potentially seriously set back Northern Atlantic bluefin tuna conservation progress made by the International Commission for the Conservation of Atlantic Tunas and seriously undermined our future effectiveness.

Let me emphasize this: The Department of Interior and US Fish and Wildlife interference in a longstanding complex, technical and political issue handled by the Department of Commerce/NOAA's ICCAT Advisory Committee of bluefin tuna mixing/migration, not well scientifically understood management process has been set back by your Agency's interference. Your Agency's intent, to carry out the Pew Charitable Trust agenda to keep the CITES threat to ICCAT alive completely backfired and ultimately will be counterproductive. Thankfully and fortunately, the Japanese government and fishing industry had the strength to stand tall, pursue the proper course and match the PEW wasted funds.

The millions spent on this ridiculous battle could have been channeled into critically important scientific research to promote efficient world wide bluefin tuna conservation. But Pew needs the BFT Trophy.

You and FWS have undermined seriously the competent efforts of Ms. Margaret Spring (Dr. Lubchencko's, NOAA Chief of Staff), Dr. Rebecca Lent (U.S. Federal ICCAT Commissioner) and Dr. Christopher Rogers, (Chairman ICCAT Compliance Committee) to move ICCAT and a recalcitrant EC towards a conservation ethic for North Atlantic bluefin tuna. I sat in the last row of Doha meet, watching your performance on the video screen, totally disenfranchised from the U.S. Delegation or perspective while theoretically representing tens of thousands of American taxpayers. Sadly but proudly, I sat with Japanese representatives on the correct side of this issue. For the first time in my life I was ashamed to be an American (this hurts the most for those who travel frequently abroad and wear U.S. flag adorned apparel ignoring U.S. State Department advice). U.S. FWS activity and positions at CITES no doubt damaged our credibility at ICCAT. Last year in Recife, Brazil, we achieved arguably 95% of our bluefin conservation objective spelled out clearly in a Senate Resolution sponsored by Senator Snowe and Senator Kerry.

Would you kindly have staff explain to the tens of thousands of American taxpayers the rationale of the secretive, exclusive Dept. of Interior/USFWS process leading to development of U.S. CITES positions (1 public meeting in Washington, D.C. convenient for bureaucrats but clearly designed to limit debate and regional input with those with serious financial and intelligent input to potential U.S. policy) and then U.S. negotiating secrecy at CITES meetings in foreign lands? End of daily session debriefings cannot possibly substitute for transparency of U.S. policy development, changes and rationale on meeting strategy. Please do not let staff insult our intelligence and experience on

this point in any reply. And if the answer is "we take seriously our Federal Register request for comments" please have them save it for the lame.

With the completely embarrassing, overwhelming trifecta vote defeating U.S. radical meeting objectives, does anyone think the EC and North African countries now seriously fear a future CITES threat?? Your team, assuming there was a good one, I was prohibited from even sitting in on the meetings so I have no basis to judge, blew it all and now the IAC delegation has to pick up the damaged wake of FWS and PEW publicity objectives and get back to the business of trying to conserve BFT for the future. The repudiation of the positive action on porbeagle shark approved on Wednesday and rejected on Thursday was again humiliating to the US and ENGOS. When will the US Fish and Wildlife Service get the message and international reality? It is fruitless to attempt to circumvent established international RFMO's processes such as ICCAT and the underlying international treaty agreements approved by the U.S. Senate and signed by U.S. Presidents!

What you have achieved Mr. Strickland, in furtherance of the Pew agenda, and yes our substantial fishery community is irate about this as voters and taxpayers, is a serious undermining of the United States delegation's credibility within the ICCAT community of 45+ countries, recognizing that the EC block gets only a few votes at ICCAT despite representing at least 27 fishing nations (including 4 of the largest BFT catches by France, Spain, Malta and Italy).

Personally, I have served for 20 years on the ICCAT Committee and 19 continuous years on the US Delegation to ICCAT. I have written extensively and publically about the "sea change" in conservation attitude at the last ICCAT meeting in Recife, Brazil. I have urged, with no success the ENGOS/PEW to claim critical success in rebuilding North Atlantic swordfish to help restore the market damage from the "Give Swordfish a Break" campaign. Just to note, North Atlantic swordfish is now over-rebuilt at 1.05% of the biomass necessary to sustainably produce the maximum sustainable annual yield, with U.S. fishermen, who burdened the brunt of conservation, continued to be consistently disadvantaged in domestic and international markets by excessive closed area regulations and the lingering damage from the PEW despicable "Give Swordfish A Break" campaign.

I have noted in brief, the damage your positions (FWS/Interior) at CITES has done to progress made at ICCAT by some hard working, extremely environmentally sensitive individuals. I cannot and do not speak for the U.S. ICCAT delegation led by NOAA and Dr. Lent and Dr. John Graves (Professor at VIMS, College of William and Mary). But I'm certain that at least one former Commissioner shares my view that your CITES activities have irreparably harmed hard fought U.S. government incremental progress in a very difficult international fora and scientifically difficult and challenging management issue.

I hope it is clear, we do not appreciate the Department of Interior and U.S. Fish and Wildlife advancement of the radical, continuing anti-commercial marine fishing agenda of the PEW Charitable Trust and former employees of FWS now hired guns for

PEW with their inside connections and knowledge. And, should you decide to order a response, spare us from insulting suggestions that bluefin are going extinct. Again, staff can save that for correspondence with the drama, trophy seeking crowd (and this is as polite as I can be here).

Even though this issue with CITES is history for at least the next 2 years, I am available to converse if you wish to feel better about the future recovery of the bluefin tuna resource about to happen from a knowledgeable source beside Susan and PEW. I am still fearful the open space on your friends at Pew wall for a bluefin trophy plaque might have to wait or remain empty for eternity.

Sorry to give you such a bad initial reality impression but the truth will overcome PEW and Susan's new found employment.

Cheers.

Rich Ruais, Executive Director
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