



November 9, 2021

Alexa Cole, Director
Office of International Affairs and Seafood Inspection
NOAA Fisheries
1315 East-West Highway
Silver Spring MD 20910

Re: Atlantic bluefin tuna MSE – Stakeholder Input

Dear Alexa,

Further to the Atlantic bluefin tuna MSE webinar held on November 4, ABTA appreciates the opportunity to provide comments, as below.

With regard to ICCAT Resolution 18-03

The four possible management objectives listed in this document are:

Stock Status	A greater than []% probability of the stock occurring in the Kobe green quadrant
Safety	A less than []% probability of the stock falling below B_{LIM}
Yield	Maximize overall catch levels
Stability	Any increase/decrease in TAC between management periods to be less than []%

Stock Status: We would like to point out that since 2009, the standard probability with regard to Stock Status as determined by the Kobe plot and used by the tRFMOs has been 50% and we see no compelling argument for changing this value in the MSE. However, we would question the utility of using the Kobe plot in the context of this MSE, but that is another conversation outside the scope of this letter.

Safety: No decision has been taken regarding B_{LIM} and therefore it would be premature to affix a value to the percentage probability of the stock falling below B_{LIM} .

Yield: This calls for “maximizing overall catch levels” and this is unambiguously stated in the preamble to Annex 1 of the ICCAT Convention.

Stability: This is achievable by limiting the increase/decrease in TAC to a fixed percentage in any given iteration of the MSE and is a critically important statistic for which stakeholders have keen interest. However, in our opinion, to make a determination on this statistic at this time would be premature.

Stakeholder Input

Normally, here in the U.S., we are accustomed to providing stakeholder input at public comment meetings or by writing to the Agency. In the case of the IAC, stakeholders typically provide their views orally at Committee meetings and/or provide their views in writing to Committee members just prior to meetings in which input is sought. Stakeholder input for an MSE is managed in a very different way.

Our discussions here in the US may be a bit muddled because of the absence of a clear explanation of the overall process that better puts its components in perspective; in particular, the stakeholder input. I'm referencing a process which takes place locally, here in the US. Each CPC will no doubt engage in their own MSE stakeholder input process. This stakeholder input process is indeed unique to MSE in general and the particular practices implemented by the U.S. will be unique to Atlantic bluefin tuna MSE. Best practices for stakeholder input are well detailed in the scientific literature on the subject.

Dr. Doug Butterworth is an internationally recognized authority on MSE and he is the Chair of the Bluefin MSE Technical Working Group of the SCRS. I have asked him to provide us with a brief overview of this process, as below:

“A key benefit of the MSE process is that it includes iterative interaction with stakeholders (decision makers, industry/recreational, managers, ENGOs, etc.), so that the scientists developing Candidate Management Procedures (CMPs) can be guided to formulate them in a way that best meets the requirements and concerns of those stakeholders. At a detailed level, there are many choices to be made in developing a CMP – for example, how frequently should TACs be revised (e.g., every two or every three years). Given the options that are initially the most attractive to stakeholders, CMP developers will then explore these further to provide quantitative results concerning the disadvantages and benefits of each, thus providing a sound basis upon which choices can ultimately be made. What is of particular importance here is timing. Except for some initial, brief and broad level interaction, discussions amongst scientists (particularly CMP developers) and stakeholders needs to wait until the MSE process and the initial development of alternative CMPs has advanced to the stage where reliable values for quantitative trade-offs can be given (e.g. if catches are increased by X%, what will be the consequences in terms of the quantitative extent of further depletion of resource abundance that will follow). Of course, ultimately it will be the decision makers who will select amongst the final CMPs that survive this process, but they will do so with the benefit of seeing the trade-offs preferences for different measures of performance (such as between the average catch to expect, and how much catches are likely to change from one year to the next – larger average catches necessitate greater inter-annual TAC changes to maintain risk to the resource at the same level) that different groups of stakeholders prefer.”

The stakeholder input for an MSE is a process in which stakeholders are given the possibility to test different CMPs by testing various performance statistics which need to be incorporated in those CMPs. It is a very valuable exercise to apply variants of a management strategy in this way, in that it enables stakeholders to understand how these variables will affect the resultant output from the MSE. It intends to develop informed input from stakeholders. Therefore, individuals who represent the bluefin tuna stakeholder community (decision makers, industry/recreational, fishery managers, ENGOs, etc) would meet in a workshop setting for this purpose.

Software, referred to as the “Shiny App” has been developed specifically for the bluefin MSE to provide stakeholders with the opportunity to test various parameters, statistics, trade-offs, etc. in this workshop setting. The Shiny App will provide results for CMPs (with different tunings) already run (but will provide much information anyway). If there is a request to change a parameter setting on a CMP, computations would need to be redone before the results would be available from the Shiny App, and this does require some time for the app to compute. This could take overnight in some cases. Therefore, in order to facilitate this process, there would be a need to establish a sufficient number of workshops of adequate length. This process will no doubt be new to nearly everyone involved and it would not be desirable to “run short of time” for this critically important step in the MSE. Therefore, it would be preferable to plan for more time and more sessions than we might presently envisage. The schedule can always be reduced in length if progress is good but it is too often difficult to find additional time with upcoming deadlines, etc.

The IAC has yet to discuss how and when this process will be accomplished, and this conversation needs to take place quite soon. Assuming the results of the upcoming PA-2 intersessional on November 12 are satisfactory, we would presently look with a view toward engaging in this process sometime in February 2022 (but certainly prior to the early March Panel 2 Intersessional), after the ABFT MSE Tech Working Group has had the opportunity to make preliminary changes to CMPs relative to inputs given at the November 12 intersessional.

In summary, I would like to stress the importance of developing a workplan for stakeholder input at our earliest, and I look forward to collaborating with everyone on the IAC to develop a plan that provides adequate time for this critically important work.

Cordially,

David Schalit, President
American Bluefin Tuna Association

cc: Rachel O’Malley, NOAA Fisheries