



**Western  
Pacific  
Regional  
Fishery  
Management  
Council**

November 6, 2023

The Honorable Joseph R. Biden  
President of the United States of America  
The White House  
1600 Pennsylvania Avenue NW  
Washington, DC 20500

Dear Mr. President:

The Western Pacific Regional Fishery Management Council (Council) recommends that your Administration issue a Presidential Proclamation that would open limited fishing opportunities in the Pacific Remote Islands Marine National Monument (PRIMNM). This would modify the PRIMNM to allow commercial tuna fishing around Johnston Atoll for Hawaii-based U.S. longline vessels and around Jarvis Island for American Samoa-based purse seine vessels. This request is on the basis that U.S. tuna fisheries are sustainable, the U.S. needs stronger U.S. Pacific tuna fisheries to compete internationally, and U.S. tuna fisheries support underserved Pacific Island communities.

U.S. tuna fisheries in the Pacific are the gold standard for sustainability and monitoring. Hawaii longline and American Samoa-based purse seine tuna vessels target tropical tunas stocks that are neither overfished, nor experiencing overfishing. Historically, U.S. waters around Johnston Atoll were important to Hawaii-based vessels, and waters around Jarvis Island were vital to U.S. purse seiners supplying the local cannery in American Samoa, due to proximity with their respective ports.

Providing opportunities for sustainable tuna fisheries is consistent with important U.S. laws, Administration objectives, and international obligations. It would be consistent with the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA), which established the 200-mile Exclusive Economic Zone to protect and promote U.S. fisheries in those waters. It would be analogous to the principle embodied in the new U.N. Agreement on management of resources in Areas Beyond National Jurisdiction (which the U.S. supported) under which management of fishing for tuna and other highly migratory species is to be continued under existing international agreement (such as treaties establishing regional fishery management organizations like international tuna commissions).

Management of tuna fisheries in U.S. EEZ waters would continue under regional fishery management councils consistent with the relevant tuna commission's conservation measures. Opening these waters to U.S. fishers would also ensure a U.S. economic presence on waters throughout the Pacific, which could further ensure that attempts by foreign vessels to engage in fishing in U.S. waters would be identified and documented, assisting in the fight against IUU fishing. Opening opportunities for sustainable tuna fisheries in U.S. waters surrounding Johnston Atoll and Jarvis Island will improve upon the competitiveness of U.S. fisheries that support underserved U.S. Pacific Island communities. It will also provide U.S. vessels exclusive access to healthy tuna stocks as climate change may potentially shift these stocks into U.S. waters.

The proposed Proclamation would support 'America the Beautiful' principles under Executive Order (E.O.) 14008 and promote an inclusive approach to conservation in keeping with the tenets of equity and environmental justice (EEJ), while fostering climate-ready fisheries. Your Administration has promoted climate-change readiness (E.O. 14008) as well as EEJ (E.O. 14096). Upholding these principles while managing marine resources for the Pacific Remote Islands must support opportunities for fisheries that are critical for underserved Pacific Island communities (E.O. 13985). The goals of your National Seafood Strategy include strengthening U.S. fisheries and their global competitiveness in the blue economy. The White House March 2023 Ocean Climate Action Plan calls for U.S. fisheries to be climate-ready and to enhance community resiliency to climate change. Management of marine resources in the face of climate change calls for science-based adaptive approaches, which should include opening U.S. waters to U.S. tuna fisheries, much as the MSFCMA envisioned.

Maintaining or increasing U.S. vessels' opportunities in U.S. waters supports greater international conservation efforts and enhances U.S. influence in the Pacific. A strong U.S. economic presence in the Pacific, including fishing, is needed to fulfill the objectives of the U.S. Tri-Services Maritime Strategy and your Pacific Partnership Strategy. Blocking access only negatively affects well-managed U.S. fisheries and further forces U.S. fisheries to compete directly with poorly regulated foreign fleets on the high seas, like those from China, which the U.S. has identified as a major actor in illegal, unreported and undocumented (IUU) fishing. Many of these foreign fisheries are heavily subsidized, engage in illegal fishing, are associated with labor rights transgressions, and lack appropriate monitoring. Fisheries are the leading economic driver in the Pacific, so the U.S. has a vested interest in promoting its fisheries. As stated in your National Seafood Strategy, increasing global competitiveness of U.S. fisheries would counter the seafood trade deficit, and would require increased production and access for U.S. tuna vessels. If the U.S. does not support its commercial tuna fisheries in the Pacific, foreign assets will maintain a competitive edge over the U.S. in the region.

We, the indigenous Members of the Council representing the Council family of the U.S. Pacific and of the fisheries we manage urge your serious consideration of this request. We would appreciate meeting with you and ask that your staff contact Kitty Simonds, the Executive Director. She can be reached at [Kitty.Simonds@wpcouncil.org](mailto:Kitty.Simonds@wpcouncil.org) or +1 (808) 522-8220 to discuss the Council's requests.

Sincerely,



William A. Sword  
Council Chairman



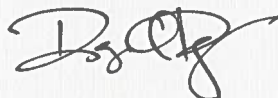
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Manuel Duenas  
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Sylvan Igisomar  
CNMI vice Chair



Roger Dang  
Hawaii vice Chair



Kitty M. Simonds  
Executive Director

CC: Hon. Gina M. Raimondo, U.S. Secretary of Commerce  
Janet Coit, NOAA Fisheries Assistant Administrator  
Western Pacific Regional Fishery Management Council Members

Attached: *Fact Sheet: Need for Tuna Fishing Access for U.S. Vessels in U.S. Pacific Remote Island Areas – Including Johnston Atoll and Jarvis Island*



## **Fact Sheet: Need for Tuna Fishing Access for U.S. Vessels in U.S. Pacific Remote Island Areas – Including Johnston Atoll and Jarvis Island**

### **Strong U.S. Tuna Fisheries Needed to Counter China**

- U.S. is vying for influence in the Pacific to counter the rise of China. Within the Pacific Islands, tuna fisheries are the leading source for national development. Therefore having a fisheries presence in the region maintains the highest economic relevance for U.S.
- As part of its Belt and Road Initiative, China is using infrastructure projects to expand its influence where tuna fisheries are key economic drivers.
- Trade volume with Pacific Island nations having diplomatic relations with China—including Cook Islands, Fiji, Kiribati, Micronesia, Niue, Papua New Guinea, Samoa, Solomon Islands, Timor Leste, Tonga, and Vanuatu—has increased from \$153 million to \$5.3 billion over the last twenty years (According to China’s Ministry of Foreign Affairs)
- Chinese Pacific tuna catch in 2000 was just over 10,000 metric tons and peaked at almost 250,000 metric tons in 2013. China catches more fish than any other country on the high seas. In 2014, their high seas catch was estimated to be more than 20% of the world total, taken by a fleet that is predominantly pelagic long-liners and squid jiggers.
- Western and Central Pacific Ocean tuna fisheries are worth \$4.1 billion per year. Government fisheries subsidies in the region represent 37% of the value of tuna.
- Competing nations have heavily subsidized fisheries. China: \$7.3B; EU: \$3.8B; Korea: \$3.2B; Japan: \$2.8B; Chinese Taipei: \$787M. Chinese subsidies deemed to be 91-95% ‘harmful’. It estimated that these subsidies are likely the difference between an industry making hundreds of millions of dollars (USD) in profits and one that would lose about \$100 million a year.
- Closures that could impede U.S. fisheries and the American Samoa economy would send the wrong message to Pacific Island nations regarding the competency of the U.S. towards its Pacific Island Territories.

### **Tuna Fisheries Support Underserved U.S. Pacific Island 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 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 12 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>)

### Science Does Not Support Closing U.S. Waters to U.S. Tuna Fisheries

- 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>)
- 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>)
- 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://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>).
- Dynamic management is superior to large static closed areas: 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>)

### Counterproductive to Conservation

- Closing more U.S. waters to tuna fisheries also forces well-monitored and managed U.S. vessels to compete on the high seas with loosely regulated foreign fisheries.
- 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>)



# Marine National Monuments of the US Western Pacific Region

