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United Nations Division for Ocean Affairs and the Law of the Sea

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Via email: doalos@un.org

Dear Mr. de Serpa Soares,

The Pew Charitable Trusts welcomes this opportunity to participate in the 17th round of informal consultations of States parties to the United Nations Fish Stocks Agreement. The theme, “Sustainable fisheries management in the face of climate change,” is timely considering that 2023 was the ocean’s warmest recorded year (NASA, 2024). Climate change directly impacts fish populations and communities and amplifies the negative impacts of fishing on the marine ecosystem. Recognizing this, regional fisheries management organizations (RFMOs) have begun to adopt climate change-related measures, but a more coordinated approach to scale adaptive fisheries management is still needed. To this end, The Pew Charitable Trusts recommends that States, individually and through their membership at the RFMOs, adopt harvest strategies, implement ecosystem-based fisheries management (EBFM), and reform governance processes to address Illegal, unreported, and unregulated (IUU) fishing.

1. RFMOs Should Adopt Climate Adaptive Harvest Strategies

Harvest strategies—or management procedures—are an important adaptive tool that can be designed to include the impacts of climate change on fish populations and fisheries. Harvest strategies shift managers’ perspective from short-term, reactive decision-making to longer-term objectives—typically based on the numbers or biomass of a given fish population—and involve agreeing in advance how fishing rules (often catch or effort limits) will be adjusted to meet those aims. An important part of harvest strategy development is the use of detailed scientific models, called management strategy evaluation (MSE), to ensure that the adopted rules will meet fisheries’ objectives under a variety of environmental conditions. This tool provides scientists and managers with the ability to incorporate expected or potential impacts from climate change into their decision making. Those impacts may include changes to expected biomass, reproductive success or changes in the geographic distribution or migration patterns of fish stocks. The tropical tuna stocks in the Pacific Ocean are a prime example where MSE should be used to help managers develop a climate-ready harvest strategy. As these tunas move from national jurisdictions to the high seas and from east to west in the face of changing ocean conditions, the relevant RFMOs—the Western and Central Pacific Fisheries Commission (WCPFC) and the Inter-American Tropical Tuna Commission (IATTC)—will need to collaboratively develop MSE-tested harvest strategies that extend across both Convention Areas (Goodman et al., 2022).

2. RFMOs Should Mainstream Ecosystem-Based Fisheries Management (EBFM)

The Intergovernmental Panel on Climate Change has determined that EBFM is a feasible and effective way to address the impacts of climate change in ocean ecosystems and related human activities (Cooley et al., 2022). EBFM harnesses advances in scientific knowledge, like MSE, to consider the interactions among species, fisheries, and a changing ocean. EBFM means transitioning from single species management to more comprehensive strategies that consider the overall health of ocean ecosystems. To accomplish that, managers should:

- Commission ecosystem models to forecast the future status of specific species in an ecosystem context and under changing conditions and provide actionable scientific advice that incorporates relevant climate considerations.
- Consider the full range of possible ecological consequences of fishing, when making management decisions about fishing opportunities. In addition to considering impacts such

as bycatch of non-target species, this also means managing exploitation within overall ecosystem constraints rather than solely assessing the impact on the population of a single exploited species. This would also include managing fisheries for forage species cautiously to reflect their role as prey for predators.

- Recognize the abilities of area-based management tools to preserve areas critical for target species, particularly where these species are at vulnerable life stages, such as nursery and spawning areas. Area-based management can also be designed to safeguard other species, such as those caught as bycatch, or to limit the use of fishing gears that damage sensitive habitat reefs or seagrass beds.

3. RFMOs Should Enact Governance Reforms to Address IUU Fishing

As climate change pushes fish further from their traditional ranges—and in some cases, to less governed spaces—commercial fishers who have traditionally relied on those stocks may turn to IUU activities for revenue and food. They may also look to cut costs in the face of declining catch by compromising labor and safety standards. In addition, climate-driven changes to the ocean may lead to contested maritime boundaries or jurisdictional challenges for fisheries management, all of which underscore the importance of advance planning at the regional level (Young, Haenlein, and Evans 2023).

The FAO's 2023 workshop on climate change in the Indo-Pacific region is a good example of an effort to strengthen regional coordination and increase capacity. Continued collaboration on transboundary issues is also needed to ensure that RFMOs successfully integrate climate change into practices that address IUU fishing and prevent any potential conflicts. Specific actions such as increased transparency of vessel ownership and access agreements could help fisheries managers better prepare for these social and governance outcomes of climate change.

Summary Recommendations

Based as our experience as an official observer organization working to improve fisheries management at multiple RFMOs around the globe, we have developed an overview of recent progress made by the RFMOs to incorporate climate change into their decision-making processes and the required next steps based on the recommendations listed above.

Table 1 – Climate change actions at select RFMOs:

RFMO	Progress to date
The International Commission for the Conservation of Atlantic Tunas (ICCAT)	Adopted Resolution 22-13 to initiate climate work through a joint experts meeting and develop a Commission workplan.
Inter-American Tropical Tuna Commission (IATTC)	Adopted Resolution 23-10 to include climate change as an agenda item at the scientific and Commission meetings.
Indian Ocean Tuna Commission (IOTC)	Adopted Resolution 22-01 to further climate research and capacity building.
Western and Central Pacific Fisheries Commission (WCPFC)	Adopted Resolution 2019-01 to consider climate change impacts and support further research.
Commission for the Conservation of Southern Bluefin Tuna (CCSBT)	Recognized climate change as priority item in the 2021 performance review of CCSBT.
North East Atlantic Fisheries Commission (NEAFC)	Adopted 2023 resolution on climate change considerations for the attention of the Permanent Committee on Management and Science.
The North Pacific Fisheries Commission (NPFC)	Adopted 2022 Resolution to consider the potential impacts of climate change.
South Pacific Regional Fisheries Management Organization (SPRFMO)	Adopted Commission Decision 13-2023 to include climate change as a permanent agenda item.

Immediate next steps for RFMOs should include:

- Establishment of a climate change working group and adoption/implementation of a workplan.
- Adoption of harvest strategies/management procedures for all managed species, developed via management strategy evaluation (MSE).
- Expansion of single species reference points (i.e. thresholds to prevent biomass decline and excess fishing pressure) to ecosystem reference points, reflecting enhanced knowledge of ecological drivers and relationships.
- Tasking of the Scientific Committees to integrate climate change evidence needs and analyses into work plans and advice.
- Protection of important fishery and ecosystem areas (e.g., nurseries and spawning areas).
- Increased regional coordination to address changes in fisheries distribution and develop co-management processes.

Conclusion

To weather ocean changes, RFMOs should improve fisheries management by implementing tools recommended in this submission. While rapid, large-scale emissions reductions are needed to avoid crossing ecological thresholds beyond which adaptation measures will no longer be effective for fisheries, there are still many steps that managers can take in the near term. If States increase coordination, incorporate EBFM including through harvest strategies and MSE, and implement governance reforms targeting IUU fishing, they will put global fisheries in the best position to adapt to the changing climate and ocean in the decades to come.

Pew encourages the ICSP17 meeting participants to use this submission to develop recommendations to RFMOs on how to secure sustainable fisheries management in the face of climate change. We look forward to further engagements on this topic and thank you for your consideration of the above.

Respectfully,



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