



November 24, 2020

Andrew Lawler  
Deputy Assistant Secretary for International Fisheries  
NOAA Fisheries  
1315 East-West Highway, 13th Floor  
Silver Spring, MD 20910

Michael Tosatto, Regional Administrator  
NOAA Fisheries Pacific Islands Regional Office  
1845 Wasp Boulevard, Bldg 176  
Honolulu, HI 96818

**RE: Western and Northern Pacific Ocean Striped Marlin**

Dear Mr. Lawler and Mr. Tosatto,

As leading local, national, and international recreational and small-boat fishing and ocean conservation organizations, we are writing to express our support for the United States' commitment to negotiating a strong international rebuilding plan for Western and Central North Pacific Ocean (WCNPO) striped marlin that will replenish the spawning stock and restore opportunities for small-boat fishermen and recreational fishermen in Hawaii and the eastern Pacific.<sup>1</sup> The Pacific's

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<sup>1</sup> The boundary of the WCNPO striped marlin and Eastern North Pacific striped marlin stock is defined as the waters of the Pacific Ocean west of 140°W and north of the equator. However, studies indicate that striped marlin caught in southern California are genetically linked to the WCNPO striped marlin stock representative in Hawaii, Japan, and Taiwan. Therefore, supporting a rebuilding plan for WCNPO striped marlin may improve the availability of striped marlin to southern California recreational fishermen.

largest predatory fish have been drastically impacted by industrial fishing. WCNPO striped marlin are no exception and their numbers hover at historically low levels. We ask for your continued leadership to ensure adoption of meaningful international conservation measures necessary to rebuild striped marlin and ensure fishing opportunities for the future.

We support practical measures that reduce the industrial bycatch of striped marlin. The options we outline below have little to no impact on the catch-rate of the target bigeye tuna or swordfish, but have positive consequences for marlin, other non-target species and protected species. Please consider the following when setting U.S. priorities:

- 1) **Expanding the use of circle hooks.** It is well recognized that one of the most important steps the United States can take to promote more sustainable fishing is to adopt meaningful management measures in the United States that we can export and which the international community will adopt. The U.S. longline fleet pioneered the use of circle hooks which yield conservation success not only for marlin, but sharks, sea turtles and sea birds. Large circle hooks (18/0) have shown to reduce the catch rate of striped marlin by 42% when compared with tuna hooks and 33% when compared with J hooks.<sup>2</sup> Also, the post-release survivorship of marlins caught and released on circle hooks exceeds 90%.<sup>3</sup> We support the oceanwide use of circle hooks on all longline vessels to reduce striped marlin catch and maximize post-release survivability.
- 2) **Requiring release of all live striped marlin.** While minimizing catch of striped marlin is a preferred method to achieve rebuilding, mandatory release of live marlin at haul back permits fishing activity to continue while protecting parental biomass and the fishery.<sup>4</sup> According to the Western Pacific Fishery Management Council, 48% of striped marlin caught on U.S. longlines are alive at haul back. Requiring release of all live striped marlin would catapult us towards achieving our rebuilding goal, as the majority of billfish survive when released from longline fishing gear.
- 3) **Modifying longline gear to remove hooks adjacent to floats or increase hook depth.** Research has demonstrated that removing hooks adjacent to floats or increasing hook depth reduces the catch of marlins. This also has a beneficial impact on certain sea turtles and sharks, including the threatened oceanic whitetip shark. The shallowest hooks adjacent to the longline floats have substantially higher billfish catch than any deeper hooks. Recent studies demon-

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<sup>2</sup> Curran, D., and Bigelow, K. Effects of Circle Hooks on Pelagic Catches in the Hawaii-Based Tuna Longline Fishery, *Fisheries Research* 109 (2011) 265-275.

<sup>3</sup> Musyl, M., Moyes, C., Brill, R., Mourato, B., West, A., McNaughton, L., Chiang, W., and Sun, C. Postrelease Mortality in Istiophorid Billfish, *Canadian Journal of Fisheries and Aquatic Sciences*. 72 (2015) 1-19.

<sup>4</sup> The International Commission for the Conservation of Atlantic Tunas (ICCAT) recently adopted C-19-05, requiring the release of blue marlin and white marlin to help rebuild the species. ICCAT C-19-05, available at <https://www.iccat.int/Documents/Recs/compendiopdf-e/2019-05-e.pdf>

strated a significant reduction of catch when the shallow hooks were eliminated in deep-set longline sets.<sup>5</sup>

- 4) **Protecting striped marlin spawning and nursery grounds.** Spatial management measures, such as time–area closures, offer a widely advocated strategy for managing bycatch in fisheries and the impact on particular life history stages particularly time-area spawning closures. Catching and killing spawning striped marlin harms the population by removing vital, reproductive adults, and preventing those fish from replenishing the stock. Spawning grounds of striped marlin are confirmed in the Hawaiian waters<sup>6</sup> and the Kona Gyre and Cross Seamounds have historically been regarded as primary spawning grounds and nursery habitat for striped marlin. We ask you to consider identifying and protecting key spawning and nursery habitat for striped marlin by prohibiting longline fishing in these areas.
- 5) **Mandatory reporting of live and dead discarded striped marlin.** The absence of data on live and dead discards largely precludes stock assessments from determining depletion rates and abundance of the stock.

Managers often turn to annual commercial limits<sup>7</sup> as a first step towards rebuilding a stock. However, catch limits alone cannot shield WCNPO striped marlin from excess fishing mortality. Once the limit is reached a nation will continue their pursuit of target species, and catch, kill and discard striped marlin. Accordingly, we support adoption of annual limits and robust complementary, ocean-wide conservation and management measures to ensure fishing mortality is reduced on paper and on the water.

Over the past 10 years, the United States has reduced its annual commercial catch of striped marlin by 16%.<sup>2</sup> This reduction is a result of the implementation of the 0.2 t (t

Sincerely,



Theresa Labriola  
Pacific Program Director  
Wild Oceans



Jason Schratwieser  
President