Comments by Japan's fisheries administrators regarding management procedure
管理手続に関する日本の行政のコメント

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本文書では、管理手続を策定するにあたり、日本の行政が重要とみなす事項について示している。管理目標の重み付けに関しては、日本は、①漁獲重量を短期的、長期的双方で最大化すること、②漁業における短期的変動の大きさを最小にすること、③親魚資源量が事前に定義されたレベル以下に落ちる危険を最小にすること、④目標年までの親魚資源量の回復を実現すること、の順に重要であると考える。

1) Objectives: what should an MP achieve

(Regarding the 4 objectives to serve as guidelines for MP development process and their weighting)

The recommended objectives to serve as guidelines for MP development process are as follows:

(1) Maximize the catch by weight in both the short and long term;
(2) Achieve the rebuilding target for the parental biomass by the target year;.
(3) Minimize the risk that the parental biomass falls below a predefined level; and
(4) Minimize the magnitude of short-term fluctuations in the fisheries.

Japan's comments on weighting of the management objectives are as follows:

- Japan considers that weighting of the objectives should take the order of priority of (1), (4), (3) and (2) because we believe that the catch should be maximized in the first place, hence (1) is the most important of all. Then, (4) should follow in importance because fisheries are economic activities and fishers cannot ensure stable operation if catch allocations fluctuate largely from year to year. Then, Japan believes that (3) ensuring parental biomass comes third.

2) Important points for fisheries administrators in developing management procedures

- Except for the case where the state of the stock is obviously deteriorating, we should avoid directly reflecting the changes in the results of annual analyses, which causes global TAC fluctuating annually from the viewpoint of ensuring stability of fishery. It is advised that changes should take place only when some levels of increases or decreases are observed as a result of data accumulation over a span of several (5?) years.
- For this reason, in changing global TAC, it is crucial to make clear what intervals should be allowed or how much changes would justify decisions. It is also advised that a certain prenotification period is given before changes are introduced.

- In case the fluctuation values of global TAC calculated on the basis of the above conditions are very large, changes for single year should be reduced by dividing the changes into several years.
- Especially, when there is a need to reduce global TAC, there are two possible approaches: (1) maintain the current catch level and reduce it significantly later, and (2) cause gradual reductions. We believe the latter approach is more realistic.
- It is desirable that an MP is not far removed from the actual fisheries situation and easy to be comprehended. An MP in which there is no feedback for fishers who are in direct contact with the fishing situation or which is incomprehensible and complex cannot be accepted by fishers.
- It should be noted that based on the experience of catching about 16,000 tons of fish for a long period, fishers believe there is no concern of depletion of the stock as long as the present level of catch is continued. Therefore, there is no way to take the option to decrease the current global TAC.

3) Uncertainties that we should consider

- For the time being, CPUE in Japan's longline fisheries serve as realistic input data. As CPUE is considered to be subject to changes by various factors other than the stock situation, risk will be involved in changing TAC on the basis of short-term judgment. (Decisions should be made based on the trend at least for five years .)
- Scientists from some countries assert that various uncertainties should be probed. Needless to say, consideration should be given to uncertainties. But various uncertainties have naturally differing priorities. We believe that any uncertainties having higher importance should be addressed, but unnecessary effort should not be expended on those with low priority.

4) Ways to weights to the various OMs and how well they fit past data

- It is a problem for a scenario having large discrepancies with the actual situation and a relatively reasonable scenario to have the same ways of weighting. Because a scenario with extremely low productivity is considered to be apart from the real situation, its weighting should be set at a low level.
- In developing the robustness criteria, cautions should be made that they are less stringent and correspond to situations that need to be avoided at all cost. There is a need to take caution not to develop the criteria encompassing higher levels of rebuilding, as in the Australian proposal, which would result in placing many management procedures outside the criteria, thus narrowing the scope of options.