

Letter from the United States Delegation regarding recreational catches of western Atlantic bluefin tuna and related comments

On 28 January 2026, the Secretariat received a letter from the Head Delegate of the United States, Mr Andrew Lawler, regarding recreational catches of western Atlantic bluefin tuna.

The Chair of Panel 2 and the ICCAT Secretariat took note of the interpretation of the *Recommendation by ICCAT for a conservation and management plan for western Atlantic bluefin tuna (Rec. 22-10)* provided by the United States delegation. While this interpretation differs from the understanding of the Chair of Panel 2 and the ICCAT Secretariat, it is noted that the interpretation of ICCAT Recommendations does not fall within the mandate or authority of either the Chair of Panel 2 or the ICCAT Secretariat.

In light of the above, the ICCAT Secretariat requested comments from the Panel 2 members through ICCAT Circular #00641/2026 and received submissions from Canada, the European Union (EU) and Japan on this matter.

The original letter, as well as the aforementioned comments, have been compiled in this document.

Letter from the Head Delegate of the United States

- 1. Response from Canada**
- 2. Response from the EU**
- 3. Response from Japan**

Letter sent by the United States
[ICCAT Circular No. 00641/2026]

27 January 2026

Mr. Camille Jean Pierre Manel
ICCAT Executive Secretary
C/ Corazón de María 8
28002 Madrid
Spain

Dear Camille;

This letter is to acknowledge that the Western Bluefin Recommendation 22-10 does not require Western harvesters to count their recreational catch of Bluefin toward their quota. As such, beginning January 1, 2026 and henceforth, the United States will continue to report its recreational catch of bluefin tuna for management purposes but will not count its recreational catch toward its current quota of 1572mt, which will be solely allocated to its commercial catch.

Respectfully,

(signed)

Andrew "Drew" Lawler
Principal Deputy Assistant Secretary
NOAA International Fisheries

1. Response from Canada

Fisheries and Oceans Canada

11 February 2026

Mr. Camille Jean Pierre Manel
Executive Secretary
International Commission for the Conservation of Atlantic Tunas (ICCAT)
Calle del Corazón de Maria 8, 6-7 floors
28002 Madrid
Spain

Dear Mr. Manel,

Canada would like to offer a response to ICCAT Circular #00641/2026.

Canada does not have the same interpretation as the United States of Recommendation 22-10, which is replaced by Recommendation 25-05. Canada's interpretation is that catches from recreational fisheries shall count against a CPC's annual allocation. When the western Bluefin measure grants differential treatment to recreational fisheries, it does so explicitly, as is the case in paragraph 11 of Recommendation 25-05. Therefore, short of an explicit exemption for recreational fisheries in allocation-related provisions, the measure cannot be interpreted as excluding recreational catches from the annual TAC set out in the measure.

Canada's interpretation of all ICCAT Recommendations for harvestable fish stocks is that catches (landings, dead and live discards) must be reported to ICCAT annually and that these catch reports must cover all types of fishing gears used and purposes of fishing (recreational, commercial and subsistence fishing). As for how these reported catches apply to Total Allowable Catches and individual CPC allocations listed in ICCAT Recommendations, these TACs have been set based on scientific advice and they represent the maximum amount of fishing mortality that can be exerted each year from all sources. When an ICCAT recommendation allows a deviation from this interpretation, it clearly says so (e.g., Rec 19-05 which allocates Landings Limits to CPCs as opposed to TAC or catch limits). There is nothing in the western BFT Recommendation (22-10 nor 25-05) that would allow some types of fishing mortality (commercial) to apply to a CPC's allocations of the TAC while allowing other types of fishing mortality (recreational) to be excluded from compliance totals.

Paragraph 4 of Recommendation 25-05 sets an annual TAC of 3,081.6 t, inclusive of dead discards, for 2026, 2027, and 2028. In developing the management procedure, the MSE assumed the total fishing mortality for Atlantic bluefin tuna would reflect all sources of mortality, whether commercial or recreational, landed or discarded. Not accounting for the significant mortality arising from recreational fisheries would be outside the framework of the management procedure and would invalidate all of the testing results provided during the MSE. Furthermore, the annual TAC set in Recommendation 25-05 is already granting western CPCs a 20% increase to the TAC set by the management procedure. The impacts of a further increase in harvest pressure cannot be known until the SCRS provides specific analysis of this type of change, but it is safe to say that the management procedure would no longer be valid.

Canada expects that the Compliance Committee will, as per its normal process: review compliance with ICCAT conservation and management measures, including catch reporting information available from all CPCs; determine whether each CPC's catches are in compliance with ICCAT requirements; and recommend any corrective actions.

Sincerely,

Mark Waddell

Canada's Head of Delegation to ICCAT

2. Response from EU

EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

International Ocean Governance and Sustainable Fisheries
Regional Fisheries Management Organisations

Brussels MARE.B.2/AD

Mr Camille Jean Pierre Manel
Executive Secretary
ICCAT
28002 Madrid
Spain

Subject: EU Comments - ICCAT Circular # 00641 / 2026

Dear Camille,

In respect of ICCAT Circular #00641/2026, the European Union (EU) does not agree with the United States' interpretation of Recommendation 22-10, which is replaced by Recommendation 25-05.

The aforementioned ICCAT circular indicates that the United States (US) intends to allocate its annual quota of Western Atlantic bluefin tuna exclusively to commercial catches, and reporting – but not counting against their quota – catches from recreational fisheries.

Paragraph 4 of Recommendation 25-05 states, "An annual TAC, inclusive of dead discards, of 3,081.6 t is established for 2026, 2027, and 2028." The absence of a specific provision on catches from recreational fisheries can and should not be interpreted as exempting recreational fisheries from the scope of the catch limits set by ICCAT.

The EU would like to recall that the annual Total Allowable Catch (TAC) was determined based on a Management Procedure that considers the total fishing mortality of Western Atlantic bluefin tuna, encompassing removals from recreational fisheries as well, and represents the maximum amount of fishing mortality that can be applied each year.

The EU furthermore would like to point out that according to the Management Procedure, the TAC for the Western stock should have been set at 2,568t. ICCAT already stretched the scientific advice to the maximum by setting a TAC that is 20% higher than the recommended TAC – 20% being the upper threshold before exceptional circumstances occur. The EU made it very clear during the discussions at the 2025 annual meeting that it is not comfortable with stretching the scientific advice to this point and insisted that this entails that any catch beyond the TAC would automatically trigger the exceptional circumstances protocol for the Western stock.

Should the US not account for recreational catches within the bluefin tuna quota it has been attributed, the EU is of the position that:

- Exceptional circumstances would occur for the Western stock and that would require the SCRS to evaluate whether a change in the advice is necessary and could lead to a situation where ICCAT would have an obligation to adjust the TAC for the Western stock;
- The US would be bound to pay back next year any bluefin tuna caught in excess of its quota this year.

Yours sincerely,

Stijn BILLIET
Head of Unit

3. Response from Japan

FISHERIES AGENCY
MINISTRY OF AGRICULTURE, FORESTRY AND FISHERIES, GOVERNMENT OF JAPAN

10 February 2026

Mr. Camille Jean Pierre Manel
Executive Secretary
ICCAT

Dear Mr. Manel,

In respect of ICCAT Circular #00641/2026, Japan objects to the interpretation by the United States on the Recommendation 22-10, which is replaced by Recommendation 25-05, and expresses its serious concern for the decision of the United States to count no recreational catches of Western Atlantic bluefin tuna against its annual quota.

Paragraph 4 of the Recommendation 25-05 states, "An annual TAC, inclusive of dead discards, of 3,081.6 t is established for 2026, 2027, and 2028." This is because the Management Procedure was developed based on the total fishing mortality for Atlantic bluefin tuna by taking into account all sources of removals, including both commercial and recreational fisheries. Counting no recreational catches against the national annual quota is therefore inconsistent with the scientific assumptions underpinning the stock assessment and the Management Procedure agreed by the ICCAT. Also, there is no specific text in the Recommendation that excludes recreational catches from the national catch amount, which shall be within the quota.

In the past several years, United States's recreational catches of Western Atlantic bluefin tuna reached over 200 metric tons, and it was 451 metric tons in 2024. Exclusion of such amount of recreational catches from the catch amount against the quota may result in actual removals exceeding the level assumed under the management framework. Such a situation would trigger conditions comparable to those envisaged under the EC provisions of the Management Procedure. The fishing mortality would deviate substantially from the assumptions on which the Management Procedure is based and provide adverse impacts on the stock.

If the total catch of United States including recreational catches exceeds its quota, the amount of overharvest shall be deducted from the next year's quota in accordance with paragraph 8 b) of Recommendation 25-05.

Sincerely,

Haruo Tominaga
Japan's Vice Commissioner to the ICCAT