



Washington, D.C. June 15, 2015

TO: Mr. F. Teo, Mr. B. Kumasi and Mr. R. Clarke

SUBJECT: FAD Management Options Working Group - Stage 2 input from ISSF

Dear Sirs:

This letter is the input from the International Seafood Sustainability Foundation (ISSF) in response to WCPFC Circular 2015/26 which requested interested stakeholders to submit comments and views on how to progress each of the five issues identified in the Working Group's Terms of Reference.

1. Collection of additional data on FADs and their use in WCPO fisheries

The main sources of information on FADs in the WCPFC are from purse seine logsheets and from the Regional Observer Programme (ROP). In 2013, during SC9, an informal group was set up to discuss how these two data sources could be streamlined and improved (WCPFC-SC9-2013-ISG8). The informal group identified a number of additional elements that vessels could usefully provide through logsheets:

- FAD deployed or retrieved by Vessel
- Date Time and Position Deployed or Retrieved
- Anchored or drifting
- Type and design of FAD
- Identification Marks
- Changes since Deployed

ISSF believes that it would be useful for WCPFC to collect these additional data from vessels, even if similar fields are also being collected from purse seine vessels through the ROP. There are many advantages to having similar information from different sources; for example, it can aid in cross-checking and in filling potential gaps. More importantly, it is very likely that there are non-fishing vessels involved in deploying, checking, tending and retrieving FADs and these vessels would not be monitored by the ROP. Therefore, ISSF recommends that WCPFC require that the additional data be provided by purse seiners, and also by support vessels involved in any FAD activity.



2. FAD marking, and identification, and use of electronic signatures

The lack of a consistent unique identifier makes it very difficult to individually track a single FAD. This creates a major limitation for analyses (Abascal et al. 2014, WCPFC-SC10-2014/ST-IP-09). Several proposals for marking schemes have been proposed by CCMs and the Secretariat in the past. ISSF does not have a strong preference for any of these. However, we note that, because many FADs change "owners" -- as they are found by other vessels-- it is important to not develop a marking scheme that only tracks the satellite buoys attached to the FADs. Thus, the marking of the FADs themselves and the tracking of the buoys (issue #3) need to be considered together.

3. FAD monitoring, tracking and control

Comprehensive FAD monitoring and control is essential, like it is essential to monitor all fishing gears. ISSF believes that the most straightforward way of doing so would be by making use of the satellite buoy position information, in combination with observer data on individually-marked FADs (issue #2, above).

ISSF also believes that the quality of the scientific advice generated by SPC and the SC can greatly benefit from making these data available for scientific use (with a time lag and under appropriate confidentiality requirements, as needed.) This information would allow scientists to understand the factors regarding FADs and FAD trajectories influencing bigeye tuna catches, as well as understanding FAD density impacts on purse seine catch rates (both FAD and free school). These are critical for the sustainable management of the purse seine fishery.

4. FAD management options

ISSF supports FAD management measures that are effective and based on science. A limit on the number of FADs per vessel was recently adopted by the IOTC, but it is not evident that the limit chosen was based on any analyses or that it is intended to meet clear conservation objectives. FAD limits (e.g., through a FAD VDS) are one of many options for WCPFC, but they will not be effective if they are the only management tool. It is important to keep in mind the large capacity of the purse seine fleet in the WCPO and the fact that the number of vessels continues to increase.

In addition, FAD management measures should be applied transparently and to all fleets and throughout the range of the stocks. One of the main reasons that the CMM for tropical tunas is not working well to end bigeye overfishing is because there are so many exemptions. The WCPFC should address this problem.

5. Advise on options for FAD marking and monitoring for WCPO wide application



The monitoring and management measures above need to apply throughout the range of the tuna stocks in the WCPO. A way to encourage cooperation by those States with archipelagic waters that are not part of the Convention Area needs to be found. A comprehensive and robust regional approach is needed.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan S. Jackson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Susan S. Jackson
President