



August 18, 2015

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

SUBJECT: WCPFC FAD Management Options Working Group - Input from IPNLF, Pew, and WWF in response to WCPFC Circular 2015/26

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Drifting fish aggregating devices (dFADs) are man-made rafts deployed into the open ocean to manufacture and attract tuna schools, thereby allowing purse seine vessels to increase their fishing efficiency. Today's dFADs are not only increasing in numbers but continuously evolving technologically – equipped with GPS buoys and acoustic devices for estimating the amount of tuna around them. Their use is associated with increasing levels of fishing capacity and effort, higher levels of juvenile tuna catches, bycatch of non-target species, proliferation of marine litter, and a range of potential wide-scale ecological effects.

Globally, there are likely more than 100,000 dFADs deployed each year by tuna fishing vessels.¹ The number of GPS-equipped dFADs in the Indian Ocean alone has been estimated at around 15,000,² however a new management measure adopted by the IOTC (Resolution 15/08) would allow that number to climb as high as 57,000 in 2016. This scientifically unjustified room for increase in dFAD use threatens tuna stocks as well as the populations of sharks and other marine life. We strongly encourage other RFMOs to follow precautionary management principles at future negotiations to cap current FAD use, pending scientific advice, rather than making decisions based purely on commercial interests.

As the tuna Regional Fisheries Management Organizations (RFMOs) embark on their respective processes to further examine FAD fisheries to improve the management of FADs, we encourage these working groups to fully consider the following points:

¹Baske, A., Gibbon, J., Benn, J., Nickson, A., 2012. Estimating the use of drifting Fish Aggregation Devices (FADs) around the globe. PEW Environmental group, discussion paper, 8p

² Fonteneau, A and Chassot E. 2014. Managing tropical tuna purse seine fisheries through limiting the number of drifting fish aggregating devices in the Indian Ocean: food for thought. IOTC–2014–WPTT16–22. Available online at: <http://www.iotc.org/documents/managing-tropical-tuna-purse-seine-fisheries-through-limiting-number-drifting-fish>



- The impact of current FAD numbers on tuna populations and the broader ecosystem are poorly understood. In this context, RFMOs should apply the precautionary approach and, at a minimum, freeze the FAD footprint until more is known. Adopting ‘limits’ that actually incentivise an increase in FAD use are counterproductive.
- Mechanisms should be developed to take advantage of the valuable fishery information collected by dFADs that is currently not shared with fisheries managers or scientists. These data will provide clarity on dFAD numbers, benefit future stock assessments and other scientific endeavours, and aid in the development more effective FAD management measures. To accomplish this, dFAD data should be shared with relevant scientific bodies, secretariats, and research institutes, in line with confidentiality provisions of the RFMOs, not later than 6 months after they are collected.
- Coastal states allowing access to purse seine vessels to fish in their EEZs should consider stricter licensing requirements for use of dFADs, including the sharing of tracking information with fisheries managers and scientists, limits on dFADs in their zone at a given time, rules on dFADs deployed outside their EEZ but drifting inside, and licensing schemes. Complementary mechanisms to track and monitor dFADs should be implemented on the high seas by the RFMOs.
- In looking at the impacts of fishing on associated schools, all data must be analysed and a range of options be considered including capacity limits (i.e. numbers and types of buoys and daily/weekly/monthly limits), effort limits (number of sets), as well as combination of both.
- dFADs are a key component of fishing capacity and, as such, must be considered in any fishing capacity measures. As FADs are meant to attract tuna, they are constantly in the act of “fishing”³ and the biomass under each buoy is constantly monitored by dFAD owners. This clearly enhances the ability and therefore the efficiency of purse seine vessels to catch tuna. Commitments to “freeze capacity” or “capacity limits” at the RFMOs should apply to dFADs and buoy numbers as well.
- Vessels should be accountable for all of the FADs they deploy, and should plan to recover them as part of their fishing strategy. This is consistent with the UN Fish Stock Agreement, which calls on States to, “minimize pollution, waste, discards, catch by lost or abandoned gear, catch of non-target species, both fish and non-fish species, and impacts on associated or dependent species.” When lost or stranded, dFAD owners

³ All FADs, whether monitored or not, fit the definition of “fishing” adopted by ICCAT, IATTC, IOTC, and WCPFC.



should be liable for recovery and rehabilitation costs in case of damage to coastal habitats, such as reefs.

- Many FADs are still constructed of non-biodegradable materials, including plastic netting, and can be more than 100m in length. If non-biodegradable dFADs are not recovered, then they should be considered abandoned and this should be recorded as a violation of MARPOL Annex V, reported to the Flag State, and appropriate action should be taken minimize losses in the future.⁴
- The use of dFADs disproportionately benefits industrialized fleets by increasing catch efficiency while their negative consequences (reduced availability of non-associated tuna, reduced profitability of less industrialized fleet segments, marine litter on beaches and reefs, loss of marine animals key to ecotourism, etc.) are borne by coastal communities, particularly in small island developing states. Mechanisms to offset these impacts, such as clean up fees, should be considered and developed.
- Anchored FADs (aFADs) should be managed in line with the above recommendations, in particular when deployed and used by purse seine and ringnet operations. Since many aFADs are important for small scale, selective fisheries that support coastal communities and food security it is critical that they be clearly differentiated where appropriate.

We will continue to proactively engage in the upcoming discussions on FADs in our world's tuna fisheries, and we invite industry to collaborate with scientists and coastal states in this process to improve the transparency of FAD fisheries while allowing for an improved understanding of the overall fishery impacts. We look forward to working with all stakeholders towards a more sustainable tuna fishery and healthier marine environment.

⁴ Macfadyen, G.; Huntington, T.; Cappell, R. Abandoned, lost or otherwise discarded fishing gear. UNEP Regional Seas Reports and Studies, No. 185; FAO Fisheries and Aquaculture Technical Paper, No. 523. Rome, UNEP/FAO. 2009. 115p. See p 23.