Original: English

POSITION STATEMENT BY INTERNATIONAL POLE & LINE FOUNDATION

International Pole & Line Foundation[1]

SUBJECT: Key Areas for Action in FAD Management

Dear Joint RFMO FAD Working Group Delegates, Participants, and Observers,

This letter is submitted on behalf of the undersigned companies and fishing industry associations all of whom are Members of the International Pole & Line Foundation (IPNLF) and are involved in the supply chain of tropical tunas. In particular, we are writing to express our views on fish aggregating devices (FADs) in tropical tuna fisheries, and the need for improvements across the RFMOs and industry on management, data collection, and accountability.

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 this working group to fully consider the following points:

- 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 dFAD footprint until more is known. Adopting 'limits' that actually incentivise an increase in overall dFAD 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.
- Better understand how FAD fishing and densities of dFADs in tropical areas impact the distribution and CPUEs of tropical tunas to higher latitude coastal fisheries. RFMOs should act to eliminate and reduce social and economic hardships on coastal communities that rely on stocks of tropical tunas.
- Coastal States allowing access to purse seine vessels to fish in their EEZs should consider stricter licensing requirements for the use of dFADs, including the sharing of tracking information with fisheries managers and scientists, limits on numbers of 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, limits of supply vessels and daily/weekly/monthly deployment limits), effort limits (number of sets), as well as combination of both.
- Supply vessels and 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"[2] 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.

[1] International Pole & Line Foundation.
[2] All FADs, whether monitored or not, fit the definition of "fishing" adopted by ICCAT, IATTC, IOTC, and WCPFC.

- 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 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 100 m 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.[3]
- 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 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 encourage 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.

Sincerely,

world wise foods

FISH 4 EVER

CERTIFIED AAFA QUALITY®

M&S EST. 1884

HF Horizon Fisheries Private Limited

[3] 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.