

## Recommendation n° 11

### **Fish aggregating devices (dFADs) in the context of the conservation and management of Atlantic tunas**

The objectives of drifting fish aggregating device (dFAD) management interventions should be to reduce catches of juvenile tropical tunas, especially overfished bigeye tuna (*Thunnus obesus*) (noting the disproportional contribution of purse seiners setting on dFADs), and to mitigate other ecological impacts associated with dFADs, including marine plastic pollution, ghost fishing and the bycatch of turtles, sharks and marine mammals. The negative impacts associated with dFADs are primarily caused by industrial - multinational - fisheries that are too efficient (effort creep - EP study<sup>1</sup>), and according to a recent article published in Coastal Management (Gomez et al, 2020)<sup>2</sup> the use of dFADs can even be considered to be Illegal, Undeclared and Unregulated (IUU).

Management interventions adopted by the International Commission for the Conservation of Atlantic Tunas (ICCAT) have so far proven to be inadequate to effectively regulate the use of dFADs. This is very regretful, as bigeye tuna is a key species for our tuna fisheries and, according to data from the Standing Committee on Research and Statistics (SCRS)<sup>3</sup>, bigeye tuna has been overfished since 2015. Tunas caught with dFADs or longlines have approximately 3 times more impact on the health of the bigeye tuna spawning stock biomass, compared to purse seine free school and pole-and-line fishing. Moreover, dFADs only started to be used on a large scale since the 1990s, demonstrating their quick and major added impact on tropical tuna populations and the marine ecosystem.

**We recommend a further reduction in the number of dFADs allowed to be deployed/accessed/used per vessel, and their transparent registration and near real-time GPS tracking to be monitored by an independent body. Moreover, dFADs should not be**

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<sup>1</sup> [Slide 1 \(europa.eu\)](#)

<sup>2</sup> <https://www.tandfonline.com/doi/full/10.1080/08920753.2020.1845585> & <https://www.tandfonline.com/doi/abs/10.1080/00908320.2021.1901342?needAccess=true&journalCode=uodl20>

<sup>3</sup> [https://www.iccat.int/Documents/Meetings/Docs/2018/REPORTS/2018\\_BET\\_SA\\_ENG.pdf](https://www.iccat.int/Documents/Meetings/Docs/2018/REPORTS/2018_BET_SA_ENG.pdf)

**allowed to change ownership and we recommend the recovery of all dFADs**, i.e. their removal from the water, during the dFAD fishing closure that has already been agreed between Contracting Parties and Cooperating non-Contracting Parties, Entities or Fishing Entities (CPCs) following the SCRS advice. In this respect, it is important to note that dFADs can be considered to continue to "fish" while in the water<sup>4</sup>.

It has come to our attention that an ambitious dFAD management proposal<sup>5</sup> was submitted to the 2021 Special Session of the Indian Ocean Tuna Commission (IOTC) by two Indian Ocean coastal states, i.e. Kenya and Sri Lanka. This proposal was supported by a number of other coastal states, but was dismissed by distant water fishing nations, including the EU, with the argument that more science was required to be able to progress dFAD management. Somehow, an acceptable compromise agreement appeared unfeasible.

We note that a concerned group of more than 100 conservation organizations, civil society groups, artisanal fisher associations and responsible businesses, including retailers from around the world that support socially responsible and environmentally sustainable tuna fisheries called on delegates to the IOTC<sup>6</sup> Special Session to address the lack of transparency and accountability associated with the use of dFADs. The Outermost Regions Advisory Council (CCRUP) fully supports the sentiment of this urgent call, albeit for the ICCAT Convention Area. We respectfully request that the **European Commission carefully reviews this IOTC dFAD management proposal for the ICCAT context**, as we applaud the level of ambition it reflects. We dearly hope that the European Union can advocate for a **precautionary, transparent, and accountable approach to dFAD management globally**.

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<sup>4</sup> [https://brill.com/view/journals/estu/34/4/article-p731\\_8.xml?language=en](https://brill.com/view/journals/estu/34/4/article-p731_8.xml?language=en)

<sup>5</sup> [https://www.iotc.org/sites/default/files/documents/2021/03/IOTC-2021-SS4-PropD\\_rev1-On\\_management\\_of\\_fish\\_aggregating\\_devices\\_Kenya\\_Sri\\_Lanka.pdf](https://www.iotc.org/sites/default/files/documents/2021/03/IOTC-2021-SS4-PropD_rev1-On_management_of_fish_aggregating_devices_Kenya_Sri_Lanka.pdf)

<sup>6</sup> [file:///C:/Users/Cliente/Downloads/IOTC-2021-SS4-INF11\\_-\\_Letter\\_of\\_support\\_for\\_Prop\\_D\\_on\\_DFAD\\_management%20\(1\).pdf](file:///C:/Users/Cliente/Downloads/IOTC-2021-SS4-INF11_-_Letter_of_support_for_Prop_D_on_DFAD_management%20(1).pdf)

As the outermost regions defend selective and artisanal tuna fisheries we are optimistic that the European Union can appropriately protect the rights and needs of its small-scale fisheries sector, in line with the various (international) legal instruments and agreements that exist in support of this.

Best regards,

The President of the Executive Committee of the CC RUP,

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(David Pavón González)

Praia da Vitória, 15th of June of 2021