



ON A CONTINGENCY PROTOCOL FOR THE DRIFTING FISH AGGREGATING DEVICES (D-FAD) REGISTER

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PURPOSE

The purpose of this paper is to serve as the basis of discussion of the Working Party on the Implementation of Conservation and Management Measures (WPICMM) for the establishment of a contingency protocol to ensure accurate reporting in the event of a technical failure affecting the DFAD Register. This paper outlines the data, deadlines and procedure to be followed for manually reporting and aims to make a recommendation to the Compliance Committee (CoC) for a formal adoption by the Commission.

BACKGROUND

Under Resolution 24/02 on the Management of Drifting Fish Aggregating Devices (FADs) in the IOTC Area of Competence, the IOTC Secretariat was tasked with developing and maintaining an electronic register for all instrumented buoys deployed within the IOTC Area of Competence (DFAD Register). This resolution applies to CPC-flagged purse seine vessels fishing on DFADs, as well as to their associated supply vessels. While the deployment and implementation of the DFAD Register was planned on 1 January 2026, following delays in the development of the informatic tool, the implementation of the DFAD Register was postponed to 1 June 2026. This delay will allow the Commission to address some of the operational challenges or potential uncertainties that have been identified since the adoption of Resolution 24/02 and that will be identified during the test phase that will begin on 1 February 2026. Among those issues that require clarification, the need to establish a contingency protocol in case of a technical failure shall be addressed to clarify actions to be taken should those cases arise.

In line with the requirements under paragraphs 4, 8 and 13 of Resolution 24/02, buoy owners shall insert the following information concerning the deployment of instrumented buoys:

- a) unique instrumented buoy reference number that will allow the identification of its buoy owner.
- b) name of the buoy owner.
- c) unique IOTC Vessel Register number of the purse seiner that is assigned to the instrumented buoy.
- d) flag State of the purse seine vessel to which the instrumented buoy is assigned.
- e) manufacturer of the instrumented buoy.
- f) model name of the instrumented buoy.
- g) IOTC DFAD unique identifier.
- h) biodegradability category of the DFAD, or log when applicable, with which the buoy was deployed.
- i) date and time of deployment.
- j) location of deployment.

The buoy owner shall notify, through the DFAD Register and **within 24 hours of activation**, the IOTC Secretariat and the CPC when an instrumented buoy is activated, together with the IOTC DFAD unique identifier.

The buoy owner shall also notify, through the DFAD Register and within 72 hours, the IOTC Secretariat when an instrumented buoy is deactivated, including whether the DFAD and instrumented buoy were retrieved. The buoy owner shall record in the DFAD Register when an instrumented buoy has been decommissioned (i.e. the buoy was retrieved and cannot be redeployed or reactivated). If an active buoy attached to a DFAD is deactivated without being retrieved, the buoy owner shall notify the IOTC Secretariat, together with the above-mentioned deactivation notification and through the DFAD Register, the date, time, last location of the buoy and the reasons for deactivating it.

DISCUSSION

Disruption in the transmission of data relating to the DFAD Register can occur for multiple technical reasons. This could result in the inability for the buoy owners to correctly report the required information within the deadline. As those issues should not result in a compliance issue, there should be a clear framework to guide the action of the buoy owners and to allow the CoC to assess those cases.

Two types of cases can be imagined, requiring two different contingency plans to be applied:

- 1) Disruption of the e-DFAD application
- 2) Disruption in the communication from the vessel

In the first case of a disruption of the e-DFAD application, where the system is not accessible to any of the users, the transmission of the required information could not be done through the appropriate channel. However, users, in particular buoy owners, would still retain their capacity to transmit the information through other means. As such, the transmission could temporarily be done to the IOTC Secretariat and CPC/flag State via email or any available mean of communication using the same format than the batch of import data in the register. This would be similar to paragraph E of Annex I of Resolution 15/03 On the vessel monitoring system (VMS) programme. Once the situation of the e-DFAD application would have stabilised, the backlog could be inserted in the Register by the IOTC Secretariat or the buoy owner depending on the origin of the disruption.

In the second case of a disruption of the vessel's communication means, which would prevent the buoy owner from reporting the correct information within the appropriate deadlines, a protocol should be adopted to allow the buoy owners to report the information in the DFAD Register, either through other channels or at a later instance and prevent these occurrences to become compliance issues.

Proposal for a contingency protocol for failure to report information in the DFAD Register:

In case of failure of the e-DFAD application:

1. If a vessel is unable to access the e-DFAD application while still having an internet connection, the buoy owner shall temporarily report the information included in the DFAD Register via email.
2. The buoy owner shall report, within the appropriate deadlines, the information required under paragraphs 4, 8 and 13 of Resolution 24/02, by sending an email to the IOTC Secretariat and the flag State's fisheries monitoring centre (FMC).
3. If the e-DFAD application is not functioning or encountering technical difficulties that may affect the correct reporting of mandatory information, the IOTC Secretariat shall inform all CPCs and advise them on the necessity to implement email reporting, in line with paragraphs 1 and 2.
4. Once the e-DFAD application is functioning, the IOTC Secretariat shall include the information received by email in the Register and inform CPCs that normal reporting can resume.

In case a vessel temporarily loses the access to internet connection:

5. If a vessel does not have access to a working internet connection, while retaining other means of communication, and may be unable to report information in the DFAD Register within the appropriate deadlines, the buoy owner

shall communicate the information required under paragraphs 4, 8 and 13 of Resolution 24/02 to its flag State's FMC through any working mean of communication (such as facsimile, telex, telephone message or radio).

6. The flag FMC shall include in the e-DFAD application the information received from the vessel.

In case a vessel temporarily loses the access to all means of communication:

7. If a vessel does not have access to any means of communication and is temporarily unable to report any of the information required under paragraphs 4, 8 and 13 of Resolution 24/02 within the appropriate deadline, the buoy owner shall report the information immediately after resuming communications.
8. At the same time, the buoy owner shall report to its flag State's FMC the technical reasons for the late reporting. The report shall include at least the following information:
 - a. Start date and time of the disruption
 - b. End date and time of the disruption
 - c. Reasons of the disruption
 - d. Whether the situation is stable or more disruption could be expected
 - e. Confirmation that, after resuming communications, the mandatory information has been correctly reported the e-DFAD application
 - f. Any other relevant information
9. The flag State shall investigate the matter and validate the correctness of the information using all elements at its disposal (VMS positions, data reported under paragraph 23 of Resolution 24/02, ...). Once it has concluded its investigation, the flag State shall inform the IOTC Secretariat if the information reported late for that period can be considered correct. In such case, the submission of the information shall not be considered late and not be reflected as such in the e-DFAD application.
10. If this situation occurs more than three times within a period of one calendar year in respect of a particular vessel, the WPICMM shall review the cases and may decide to refer them to the Compliance Committee if appropriate.

Recommendation(s)

That the WPICMM09:

- 1) **REVIEW** and **AMEND** the Proposal for a contingency protocol for failure to report information in the DFAD Register.
- 2) **RECOMMEND** the IOTC Compliance Committee to adopt the protocol.