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## QUESTIONS RELEVANT TO THE IOTC DFAD REGISTER

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### PURPOSE

This document presents a list of questions related to the IOTC Register of DFAD (e-DFAD) for which guidance from the Commission is sought.

### BACKGROUND

At its 28th Session (Bangkok, May 2024), the *Indian Ocean Tuna Commission (IOTC)* adopted *Resolution 24/02“ On Management of Drifting Fish Aggregating Devices (FADs) in the IOTC Area of Competence”*. The Resolution tasks the IOTC Secretariat with the development and operation of the *dFAD Register*, an online system to serve as a registry of dFADs and a record of their deployment and operational status:

*Paragraph 3 “The IOTC Secretariat shall develop and maintain an electronic register for all instrumented buoys deployed in the IOTC area of competence (dFAD Register). The proper functioning of the dFAD Register shall be tested with a selection of vessels during the second semester of 2025. The dFAD Register shall be effective as of 1 January 2026.”*

With the Register, the Resolution provides support for *Contracting and Cooperating Parties (CPCs)* to:

*“collect the necessary data in order to evaluate and closely monitor the use of large-scale fish aggregating devices (FADs) and other devices, as appropriate, and their effects on tuna resources and tuna behaviour and associated and dependent species, to improve management procedures to monitor the number, type and use of such devices and to mitigate possible negative effects on the ecosystem.”*

The e-DFAD application was officially launched and opened to CPCs and Buoy Owners on 2 February 2026. A mandatory testing period will last until 31 May 2026.

On 01 June 2026, the DFAD Register will fully enter its production phase.

During the development, pilot and testing periods, a number of questions were identified by the Secretariat, CPCs and Buoy Owners, which require guidance from the Commission.

### RECOMMENDATION/S

That the Commission

- a) **NOTE** paper IOTC–2026–S30–06, which informs the Commission about questions relevant to the IOTC DFAD Register and requiring guidance.
- b) **PROVIDE** guidance needed for the evolution and improvement of the IOTC DFAD Register.

## Questions about e-DFAD for S30

### Deactivation of a retrieved buoy in the EEZ of a Coastal State and coordinates

*Submitted by: IOTC Secretariat*

Resolution 24/02 para 13 mentions:

*“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.”*

Resolution 24/02 para 28 mentions:

*“If an active buoy is deactivated while its last known location is in the EEZ of a coastal State, an automatic notification shall immediately be sent to the authorities of the flag and coastal State. The automatic notification shall include: a) date; b) time; c) geographical position (degrees, minutes and seconds) of the last known location.”*

In the current implementation, on reporting a Deactivation, if the buoy status is not Retrieved, then the user must provide deactivation coordinates, and the application checks whether the coordinates are in an EEZ or not, and if so, of which Coastal State. If yes, it notifies the relevant Coastal State (and the Purse Seiner’s Flag State) and records that information with the floating object (FOB).

As per paragraph 13, coordinates are only asked if the buoy is *not retrieved*, so the EEZ check and notification happens only when the buoy is declared Lost or Abandoned.

On the other hand, paragraph 28 doesn’t make any mention of the buoy being retrieved or not to notify a deactivation in an EEZ.

**Guidance is asked from the Commission on whether the current approach is correct or if the application should always ask for Deactivation coordinates, whether the buoy is retrieved or not, so it can notify of an EEZ deactivation even when the buoy is Retrieved?**

### Deactivation of a buoy without it being Retrieved and Logs

*Submitted by: IOTC Secretariat*

The definitions in Resolution 24/02 paragraphs 1) a) and b) of FAD/DFAD are:

*“a) Fish Aggregating Device (FAD)” means a permanent, semi-permanent or temporary object, structure or device of any material, man-made or natural, which is deployed and/or tracked, and may aggregate fish.*

*b) Drifting Fish Aggregating Device (DFAD)” means a FAD not tethered to the bottom of the ocean deployed and tracked for the purpose of aggregating fish.”*

and then paragraph 1) d) defines Logs as:

*d) “‘Log’ means a floating object of natural source or accidentally lost from anthropic activities and that was not built and deployed for the purpose of aggregating and/or locating target tuna species for subsequent capture.”*

These two definitions clearly separate DFADs from Logs.

Resolution 24/02 paragraph 13 mentions:

*“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.”*

The application currently follows the letter of Resolution 24/02 and only asks for last known coordinates when the buoy being deactivated is on a DFAD. When the buoy is on a Log, no coordinates are requested.

This also means that if a buoy on a Log is deactivated with the reason that it was lost or abandoned and that its last known coordinates were in the EEZ of a Coastal State, no notification as per paragraph 28 is sent to the relevant Coastal State and Flag State.

**Guidance is asked from the Commission on whether the current approach is correct or if last known coordinates should also be required when reporting deactivation of a buoy on a Log.**

### **Changing the Biodegradability category of a DFAD after deployment**

*Submitted by: Buoy Owners*

Currently, a DFAD’s Biodegradability category is required for registration of a DFAD, and is then immutable.

Some Buoy Owners (BOs) indicated that it might happen that, when transferring a DFAD from another vessel, or during simple maintenance, the DFAD can be repaired and improved, so its biodegradability category could change. Currently the application does not allow this.

**Guidance is asked from the Commission on whether the current approach is correct or if changing the reported Biodegradability category of an already deployed DFAD should be allowed.**

### **Standardization of the buoy identifier input**

*Submitted by: Buoy Owners*

Following the e-DFAD Pilot phase closure workshop, the following comment was made by a Producer Organisation.

*“As noted during the pilot, the BUOY ID field currently accepts any format (e.g., 123456, BOYA-123456, T8X123456). Experience shows that unrestricted formats create significant difficulties in identifying buoys and severely limit the ability to perform transfers. Since transfers require the exact UDI or buoy ID as previously registered, and without any adopted marking standards, inconsistent formats will inevitably block legitimate operations and disrupt fishing activities.*

*We strongly recommend that the Secretariat establish clear formatting rules, such as i.e., use of capital letters only, prohibition of hyphens or special characters or a fixed or limited character length (e.g., 6–9 digits). These constraints would ensure consistency and prevent operational errors.”*

*Comments by the Secretariat/e-DFAD Dev Team:*

- Lookup on identifiers is not case sensitive, so upper or lower case input has no consequences.
- Regarding input of UDIs, they have a fixed format (IOTC-[3 letters]-[3 digits]), so there is no question on how to input them.
- The question stands for Buoy Identifiers, where there might be a discrepancy between the inscription on the buoy and what was submitted by the Buoy Owner in e-DFAD for the FOB record. E.g.: Buoy carries a plate with the inscription "M3I-ABC123456" where "M3I" is the buoy model and "ABC123456" is the actual buoy identifier. When the BO deploys the FOB with the buoy, they might input the buoy identifier as "M3I-ABC123456", "M3IABC123456" or "ABC123456". When another BO tries to report a Transfer of this FOB, if they use the buoy identifier to find the target FOB, they might not find any match depending on how the buoy identifier was input in e-DFAD by the original BO.

Looking at DFAD logbook data for 2024, we can indeed see a mix of reporting formats, including:

- [Buoy ID]: "443142"
- [Manufacturer] [Buoy ID]: "SATLINK 359466"
- [Manufacturer][Buoy ID]: "Satlink486571"
- [Buoy model] [Buoy ID] "M3i 268478"
- [Buoy model][Buoy ID]: "M3iGo155858"
- Double buoy identifiers: "493447,498203"
- Buoy identifiers plus suffix: "F8X342390 (1309)"; "1085(345974)"

**Guidance is asked from the Commission on this topic.**

## **Exchange of FOBs between vessels of the same company**

*Submitted by: Buoy Owners*

During the e-DFAD mandatory testing phase, the following comment was made by a Producer Organisation.

*"Buoy transfers: The system does not allow to keep the same buoy ID to record transfers of FADs from one vessel to another. However, this happens often when vessels from the same company exchange FADs but keep the buoys on, transferring the property. This may also happen with vessels from different companies. Therefore, recording transfers keeping the same buoy ID should be allowed in the Register."*

This is about a buoy deployed on an FOB being "transferred" between vessels: the buoy ID remains the same, only the vessel changes.

Resolution 24/02 specifically defines a Transfer (Annex 1, table 6) as: "*Replacement of the buoy owned by another vessel by a buoy of the vessel*". So, it explicitly mentions that a transfer involves a change of buoy.

*Comments by the Secretariat/e-DFAD Dev Team:*

The above behavior actually happens at sea and should be handled by the application. There are two ways options for this:

- The business rule mandating that the buoy changes on Transfer can be relaxed to allow the buoy ID to remain the same. This would mean that the definition of a transfer is expanded from the one specified in 24/02; or

- A new “operation” is added for the “Exchange” of an FOB between two vessels, with the buoy remaining attached. This could also cover the cases where a vessel is sold, along with the FOBs and the buoys it tracks.

**Guidance is asked from the Commission on this topic.**