

Discussion paper on the implementation of the DFAD Register

Explanatory Memorandum

This revision includes an Annex – IOTC-2026-WPICMM09-16, which contributes to the information required for discussion.

Discussion paper on the implementation of the DFAD Register

The establishment of a DFAD register for drifting Fish Aggregating Devices constitutes a key component of the management framework adopted by the Commission under Resolution 24/02 *on management of drifting fish aggregating devices (FADs) in the IOTC area of competence*. The implementation of this tool reflects the collective commitment taken by the Commission in 2024 to enhance transparency, monitoring, and control of DFAD activities.

The DFAD Register was originally intended to become fully operational by 1 January 2026. However, as the tool was not fully operational and due to the limited time available to CPCs and operators to discover the tool before that date, an intersessional process deferred the full entry into force to 1 June 2026, after a pilot phase, a four-month mandatory test period and the meeting of the Commission. The additional time granted to developers, operators and relevant CPCs, has allowed for a phased-in entry into force of the system and ensured its robustness, usability, alignment with both operational realities and legal requirements.

The Register is currently in this mandatory testing phase, during which CPCs, administrations, and operators are required to use the system in real conditions while providing feedback on its performance. This phase is essential to identify and address any remaining technical or procedural issues, to ensure a harmonised understanding of requirements, and to prepare all actors for the full implementation of the system.

The European Union (EU) has been fully committed to the successful deployment of the Register and to making full use of this tool as part of its broader efforts to strengthen fisheries management and control. As such the EU has been closely involved in the development of the DFAD Register from its early stages, providing the funds to the IOTC for its development as well as technical and practical support for its design and implementation.

Against this background, the present discussion paper aims to provide a basis for discussion at the Commission meeting. It draws on the first experiences gained during the testing phase to present an initial assessment of the implementation of the Register, to highlight challenges encountered by users, and to identify areas where further clarifications or adjustments may be required. It also seeks to contribute to ongoing discussions on key elements necessary to ensure a smooth and effective transition towards full implementation, including the establishment of an appropriate contingency framework.

First Feedback from the Initial Use of the DFAD Register

The first weeks of implementation of the DFAD Register have provided valuable practical insights into its operation under real conditions. At the same time, this initial period has demonstrated the challenges associated with introducing a new reporting system across operators and national administrations.

In particular, the transition from the pilot phase to the mandatory testing phase took place within a very limited timeframe. This did not allow sufficient time for operators and administrations to fully prepare and adapt internal procedures, or to provide adequate training to both onshore personnel and vessel crews. At the same time, certain functionalities of the Register continued to be developed or refined as users began to interact with the system.

In particular, at the time of the start of the test period, there were still unclarities about the respective roles and responsibilities of the different categories of users within the system, including vessel masters, companies, and administrations. Multiple exchanges have been needed and are still needed to make sure that the different profiles correspond to the reality of the situations.

As a consequence, the initial phase of use has required a period of adjustment before the Register could be used in a consistent and effective manner. Operators have encountered a number of practical questions regarding data entry, workflows, and responsibilities, while at the same time making considerable efforts to ensure that both at-sea and land-based personnel are able to comply with the new requirements. Administrations have also had to adapt and adopt new practices, including in relation to the validation of data and the interpretation of procedural aspects of the system.

Despite these initial difficulties, it is important to underline the constructive engagement of all actors involved. Operators have demonstrated a strong willingness to comply and to adapt to the new system, while the Secretariat and developers have provided continuous and valuable support, both in addressing technical issues and in assisting users in understanding and applying the system. These early experiences confirm the importance of the testing phase as a necessary step in ensuring that the Register becomes a reliable and effective tool.

Key difficulties

The initial use of the DFAD Register has brought to light several operational, technical, and procedural challenges that merit further consideration. These difficulties relate, in particular, to the practical implementation of certain requirements and to the need for a common understanding among CPCs on how these requirements should be applied.

- One of the main areas to clarify had been the validation of data by national administrations, including the timelines for validation and the status of data during the period between submission by operators and formal validation. In particular, some concerns were raised about the direct submission of data from the operators to the IOTC Secretariat. The final solution found is that the data should appear as provisional data until the flag control authorities have assessed and validate the submission of the data.
- The current absence of interoperability between the Register and existing declaratory tools has resulted in duplication of reporting obligations and this is in our view a serious issue that deserve future work to simplify the work of operators, public administrations and the Secretariat itself.
- Further challenges relate to the implementation of DFAD identification and marking requirements, which currently lack sufficiently detailed technical specifications.
- Operators have had difficulties in declaring transfers on the platform: the current workaround of declaring them as new deployments does not reflect the reality of operations.
- In some cases, buoy transfers involving the movement of a buoy from one FAD to another are not recorded in the register: the removed buoy therefore remains registered as active on its original FAD, which prevents its subsequent reactivation once it returns to port.

- The buoy ID field currently accepts any format. Experience shows that unrestricted formats create significant difficulties in identifying buoys. Since transfers require the exact UDI or buoy ID as previously registered, and without any adopted marking standards, inconsistent formats can block legitimate operations and disrupt fishing activities. We strongly recommend that the Secretariat establish clear formatting rules, such as 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.
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While the possibility to have a tool summarising the activities per vessel (such as the current number of FADs/buoys) was not considered a priority during the discussions which took place in 2025, operators have highlighted the potential added value of such tool. We suggest the development of this feature once the core features of the register are in place. Similarly, the next steps in the development of the tool should be to work on integrating the information reported in the register and elsewhere (e.g. 3-BU, FAD logbook, ...) to avoid double reporting and simplify the work of the operators.

These difficulties, many of which have already been highlighted in preparatory discussions and technical exchanges, underline the importance of using the testing phase to identify practical solutions and to ensure that the system can be implemented in a consistent and workable manner across all CPCs.

Points Requiring Clarification in Resolution 24/02 or opinion of the Commission

Beyond operational challenges, the implementation of the DFAD Register has revealed a number of areas where further clarification of Resolution 24/02 would be beneficial.

- While the Register should provide an accurate representation of the situation of buoys and deployed, in practice mistakes can happen with real-time reporting. Therefore, the possibility of correcting data included in the DFAD Register should exist. A grace period should be given to the buoy owners, to allow for a primary verification either by the master of the vessels or by the land-based operations. This first period should be short (a week?). A second longer opportunity for correction shall be then given to the buoy owner through the verification process by the CPCs authorities. Possibility to edit and correct the data shall be given to the public administration profile, with the necessary justifications.
- Paragraph 11 provides the process for buoys deployed before the entry into force of the register and the ID scheme it introduces, but the cases of DFADs deployed before (and before the entry into force of Resolution 24/02 in some cases) is not foreseen. We suggest considering that DFADs deployed before 1 June 2026 be registered as such and that no ID number and bio-degradable be requested. This entry should also be extended to the deployment of a buoy on a DFAD belonging to a vessel not covered by Resolution 24/02 due to an objection.

Contingency protocol

The EU presented a discussion paper at 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. It was decided in that meeting to defer the discussion to the Commission meeting in a global scrutiny on the implementation of the DFAD Register. The paper is provided in Annex. The EU considers essential that the Commission is able to come to a conclusive approach on the contingency protocol to ensure the full operability of the Register under any circumstances.

ANNEX 1



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

PREPARED BY: EUROPEAN UNION: 26 JANUARY 2026

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.

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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

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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.