

IPNLF positions on e-DFAD System Questions (IOTC–2026–S30-06)

Background

[Resolution 24/02](#) provides that the IOTC Secretariat must develop and maintain an electronic DFAD Register for all instrumented buoys deployed in the IOTC area of competence. The DFAD Register was initially due to become fully operational on 1 January 2026. However, this has been pushed back to 1 June 2026 and a mandatory pilot phase is currently underway. Based on issues encountered during the pilot phase, the IOTC Secretariat has prepared a series of [questions](#), stemming from both the Secretariat and from buoy owners, to resolve before full implementation on 1 June 2026. This document provides the questions posed and IPNLF's response to each.

1. Deactivation coordinates when buoy is retrieved

Secretariat question

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?

IPNLF Response:

Paragraph 28 of Resolution 24/02 contains no express qualification by reference to retrieval status and therefore, *prima facie*, applies whenever an active buoy is deactivated while in the EEZ of a coastal State. However, its placement within the section headed 'Abandoned, Lost or Otherwise Discarded DFADs', and the cross-reference in paragraph 29 linking paragraphs 13 and 28 to 'reporting the loss of a DFAD', create ambiguity as to whether the drafters intended it to apply to retrievals as well.

However, there is an overriding policy reason why deactivation coordinates should be required for all instances of deactivation, whether the buoy is retrieved or not. Coastal States have sovereign rights under UNCLOS over living resources in their EEZ, including rights and obligations to manage fishing activities in their waters. They therefore have a legitimate interest in knowing when and where FAD-related operations - including retrievals - occur in their waters.

Retrieval coordinates are not merely an administrative detail; they allow coastal States to understand whether FADs are being retrieved promptly at the edge of their EEZ or are being allowed to drift progressively deeper into coastal waters before removal, potentially reaching the

territorial sea. Without this information, coastal States have no meaningful oversight of how their waters are being used.

Given the ambiguity in the current text, the Commission should clarify - whether by authoritative interpretation or targeted amendment to Resolution 24/02 - that paragraph 28 applies to all deactivations within an EEZ regardless of retrieval status, and that notifications should include whether the buoy and DFAD were retrieved.

2. Last known coordinates for buoys on Logs

Secretariat question

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:

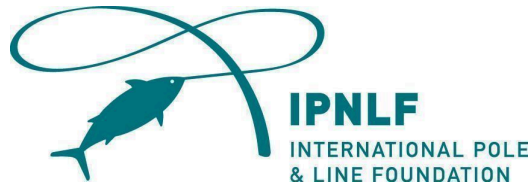
d) “Log’ means a floating object of natural source or accidentally lost from anthropic activities and that was not built and deployed for the purpose of aggregating and/or locating target tuna species for subsequent capture.”

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



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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.

IPNLF response:

Last known coordinates should be required for deactivation of a buoy on a Log, in the same manner as for DFADs. The definitions in Resolution 24/02 distinguish DFADs from Logs by reference to purpose: a Log is a natural or accidentally lost object not built and deployed for aggregating fish. However, once a buoy has been attached to and is actively tracking a floating object, that object has effectively been incorporated into a fishing operation and can no longer be treated as a passive natural object for management purposes. It is a management concern in exactly the same way as a DFAD. Requiring coordinates in all deactivation reports, regardless of the FOB type, ensures greater transparency and supports better data quality, stock monitoring, and coastal State notification obligations under paragraph 28. The current approach creates an unjustified gap in reporting.

3. Changing biodegradability category after deployment

Buoy owner question

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.

IPNLF response:

The Commission could permit changes to the recorded biodegradability category of an already-deployed DFAD, provided two safeguards are in place: first, that the system maintains a complete auditable history of all biodegradability classifications recorded for that DFAD, with dates, so that the full lifecycle of the object is transparent; and second, that any revised classification must comply with the applicable biodegradability rules and standards set out under Resolution 24/02. Allowing updates without these safeguards would undermine the integrity of the data. With these conditions met, permitting updates reflects operational reality while preserving transparency and accountability.

4. Standardisation of buoy identifier input

Buoy owner question

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.

IPNLF response:

This is primarily a technical system design question and no position is taken here. The Commission may wish to refer this to relevant technical experts to determine an appropriate standardisation approach.

5. Exchange of FOBs between vessels of the same company (same buoy, change of vessel)

Buoy owner question

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:

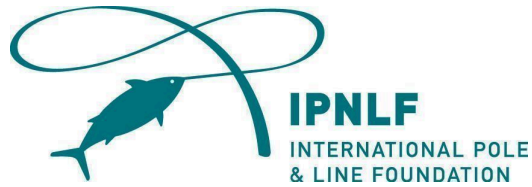
The above behavior actually happens at sea and should be handled by the application. There are two ways options for this:

- 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.

IPNLF response:

Transferring a FOB between vessels while the same buoy remains attached is not a 'transfer' as defined in Resolution 24/02, which explicitly requires a change of buoy. Allowing the system to accommodate this arrangement, whether by relaxing the definition of a transfer or by creating a



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new 'exchange' operation, would effectively water down the controls established under the Resolution and undermine the traceability and transparency that the e-DFAD system is designed to deliver.

If it is accepted that this situation occurs in practice and requires a legitimate operational pathway, IPNLF recommends that the Commission amends Resolution 24/02 directly, with full Commission scrutiny, rather than to accommodate it through a system workaround. Allowing changes of vessel ownership or tracking responsibility outside the formal definitions risks creating opacity in the system that is inconsistent with the objectives of the Resolution.