



May 11, 2015

Mr. Brain Kumasi and Dr. Raymond Clarke
Chair and Vice Chair of the FAD Management Options Working Group
C/- WCPFC Secretariat
PO Box 2356
KOLONIA FEDERATED STATES OF MICRONESIA

Dear Mr. Kumasi and Dr. Raymond Clarke:

I am writing on behalf of the International Seafood Sustainability Foundation (ISSF) in regards to WCPFC Circular 2015-26 dated May 1, 2015 regarding the intersessional process for the Western and Central Pacific Fisheries Commission (WCPFC) Fish Aggregating Device (FAD) Management Options Working Group.

ISSF is gravely concerned about the limited circulation of the Circular, which included important information on the proposed intersessional work of the FAD Management Options Working Group. In particular, observers were excluded from Commission Circular communications regarding the proposed intersessional work of the Working Group, despite the fact that paragraph 6 of the Terms of Reference for that Working Group agreed by WCPFC11 in Apia state that “The working group shall include participation by PNAO, FFA, industry, SPC and NGOs, and will be open to participation by any other interested WCPFC observers.” Fortunately, one of the scientists with whom we collaborate was aware of the Circular and mentioned it to us in passing, or else we would have been totally unaware of its existence.

You may not be aware that accredited WCPFC observers, such as ISSF, are not permitted to receive Commission Circulars because, irrespective of the contents, all Circulars are held on the secure section of the WCPFC website. We note that Circular 2015-26 suggests that all meeting notifications and reference papers for the FAD Management Options Working Group will be held on the secure part of the WCPFC website and/or provided through Circulars. This type of an approach means that the notifications and associated documents, including the consultation document, will not be available to industry or observers. As a result, the current approach for the FAD Management Options Working Group will not facilitate the participation of these groups.

As an accredited observer at WCPFC meetings, ISSF engages constructively on a range of issues including funding important scientific research on FAD bycatch and the mitigation of bigeye catches in partnership with industry and RFMO scientists, supporting SPC efforts to enter



historical FAD data from the ROP into its databases so these data can be analyzed, and supporting SPC's development and trialing of the eTUNALOG electronic reporting format that includes fields on FADs. We believe that we could provide technical advice and information that would be valuable to the work of the Group and the Commission in considering future FAD management options.

We urge you to review your proposed intersessional approach for this important Working Group, including the current exclusion of observers from the dialogue and information exchange. All work associated with this Working Group, including notifications about the electronic work and any face-to-face meetings, reference material and the consultation document should be available on the public side of the WCPFC website to facilitate participation by industry and non-government organizations, per the agreed Terms of Reference.

We look forward to continuing our constructive engagement and participation on this issue and other issues with WCPFC members directly, and through the Secretariat and the work of its working groups.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan S. Jackson".

Susan S. Jackson
President

Cc: Feleti P. Teo, Executive Director WCPFC