Position Paper for the Ad Hoc Open-ended Expert Group on Marine Litter and Microplastics, by World Animal Protection.

Name of the organization

World Animal Protection

Summary

While prioritizing land-based sources of marine debris appears to be a logical choice because of the size of the problem, alternate approaches to prioritization suggest that the issue of ALDFG or ghost fishing gear must be recognized as an issue where action can be taken quickly and effectively on a global scale and where success will have a distinct and substantial impact on the achievement of SDG 14.

We urge the Ad Hoc Open-ended Expert Group and UNEP, as custodian of SDG target 14, to ensure that ALDFG is recognized as a key topic in its formulation of a global governance framework for the management of marine litter, complementary to a global programme of work on ALDFG as being developed by FAO, so that action on ALDFG can be prioritised.

The Global Ghost Gear Initiative, established in 2015 and now 79 participants and 12 Governments strong, acts as a clearinghouse mechanism and offers relevant insights on the feasibility of different response options on the issue of ALDFG. Its operational model encourages political will and strengthens governance to address ALDFG, both considered cross-cutting barriers to combating marine litter and microplastics.

Our views on major barriers to combating marine litter and microplastics

In the current debate, the quantity of marine litter and microplastics is becoming the accepted determinant variable to rank which type of marine debris should be prioritized in terms of attention and action. For instance, greater attention is already being given to land-based sources and single-use plastics. Although quantity is relevant to this debate, the quantity approach to address the barriers to combating marine litter and microplastics will hinder the possibility of addressing the issue from a sustainable perspective.

World Animal Protection recommends marine debris to be ranked or prioritized in relation to its relative impact on ocean health and productivity. The impact approach addresses major barriers to combatting marine litter and microplastics from a more systemic perspective, addressing both land and water-based sources of marine debris, including ghost gear.

Whereas it is undisputed that the majority of ocean pollution comes from land-based sources (80 percent), it is equally true that the explicit references to this fact unnecessarily discourages action on marine-based sources of marine debris. Case in point, UN Member States first urged all States to take action on the issue of abandoned, lost or otherwise discarded fishing gear in paragraphs 77 to 81 of A/RES/60/31. Since then, UN Member States have recalled these 5 paragraphs in every Sustainable Fisheries resolution but have failed to take decisive action on this issue. As a result, a total of 640,000

metric tons of fishing gear is lost or abandoned in our oceans each year with increasingly pervasive and destructive economic, social and environmental impacts (as per A/RES/71/123).

Based on the above, one must question whether the singular issue of 'quantity' is the best determinant for prioritization of action and attention, particularly as the overall aim is to sustainably enhance the health and productivity of our oceans.

The issue of abandoned, lost and discarded fishing gear (ALDFG), also known as ghost gear, is one of the most threatening form of pollution to the health and sustainability of oceans due to its destructive economic, social and environmental impacts. UN General Assembly Resolution 72/72 (December 2017) recognizes such impacts and calls for 'urgent preventative action'. The problem of ghost gear is cumulative and growing rapidly. Some fishing gear, made from durable plastics withstands up to 600 years in oceans. Due to its durability, ghost gear enters the ocean at a rate that greatly exceeds its disintegration and/or retrieval rate.

In terms of quantity, ALDFG accounts for 10% of all marine debris (according to FAO and UNEP) yet it is the deadliest form of marine debris, accounting for 58% of all macro-plastics (larger than 5mm) in the oceans, or 70% of all floating macro-plastic debris, measured by weight. Recent research undertaken by The Ocean Cleanup Foundation found that 46% of the total mass of the Great Pacific Garbage Patch, the largest of the five global gyres that accumulate ocean plastics, is made of ALDFG[i]. Ghost gear is 4 times more likely to impact marine life, through entanglement, than all other forms of marine debris combined, according to the Joint Research Centre, the European Commission and Ocean Conservancy. Research shows that entanglement causes harm or death to the animals involved in 79% of cases. Ghost gear is likely to account for 37% of ingestion incidents[ii]. 45% of all marine mammal species on the IUCN Red List have been affected by ALDFG[1], making it a major biodiversity concern.

Another aspect to be considered when ADLFG is understood as a threat to ocean biodiversity is the physical impact it causes on the benthos, especially shallow coral reefs. Studies confirm increasing levels of broken coral, decreased coral cover, and lower species diversity in areas where debris is proliferating[iii] [iv]. 30% of corals in the wider Caribbean Sea are at risk from human causes including ghost fishing gear[v].

Also, while generalization is difficult as individual studies focus on specific species in particular geographic areas, there is an increasing consensus that ghost fishing gear hase become the second most dominant contributing cause of fish stock decline after overfishing. ALDFG is responsible for a 5-30% decline in some fish stocks levels globally[vi]. When abandoned, fishing gear continues to 'ghost fish', catching and killing fish stocks that would, otherwise, form part of the regular catch.

In addition to the marine life, biodiversity and productivity threats it currently poses, ALDFG accounts for 10-15% of all marine microplastic that does and will affect human and marine health, as it integrates the food chain, along with microplastics from various other sources.

Excessive fishing efforts, gear conflict, extreme weather, operator error, in addition to illegal, unreported and unregulated (IUU) fishing are among the key causes of ALDFG. UNEP and FAO indicated in 2009

that about 640,000 tons of ghost gear is added to our oceans every year, but it is likely that this number is now even higher as fishing efforts intensify all over the world[vii] [viii].

The adoption of the impact approach can produce positive impacts on achieving the Sustainable Development Goal targets, systemically addressing the issues presented above. In the case of ALDFG, the impact approach addresses targets 14.1, 14.2, 14.4 and 14.6, in addition to contributing to Sustainable Development Goals 2, 3 and 12.

Our views on potential national, regional and international response options and associated environmental, social and economic costs

Launched September 2015 and founded on the best available science and technology, the Global Ghost Gear Initiative (GGGI) is a platform dedicated to tackling the problem of ghost fishing gear at a global scale. Its strength lies in the diversity of its now 79 participants including the fishing industry, the private sector, academia, non-governmental organizations; and an additional 12 national governments, and supportive intergovernmental organizations (FAO, EU DG MARE, PIDF and UNEP, amongst others). Every participant has a critical role to play to mitigate ghost gear locally, regionally and globally.

In the case of ALDFG, the Global Ghost Gear Initiative serves as a global clearinghouse to leverage response options and associated costs at different levels (international, regional, and nationally), as the platform serves as a cross-sectoral alliance committed to driving solutions to the problem ALDFG worldwide.

At the international level, a global governance framework to prevent and reduce marine litter based on the impact approach discussed above, thus prioritizing action on ALDFG, should be adopted. This framework should complement the efforts of other bodies of work being developed by FAO and IMO to address the issue of ghost gear and its impact on the health and productivity of our oceans. This Framework should also include global agreement on targets to reduce ghost gear loss and removal of lost gear which should be also shared and implemented at national and infra-national levels. Such agreement must be in tune with Sustainable Development Goal target 14.1.

At the regional and national levels, the implementation of the GGGI Best Practice Framework for the Management of Fishing Gear should is encouraged. The framework sets out recommendations for the handling and usage of fishing gear from manufacture to end-of-life disposal and recycling. It is aimed at actors throughout the seafood supply chain, including governments and regulatory bodies, and provides a holistic combination of principles for best practise, considered and targeted best management practices and case studies to build awareness and enable practitioners to reduce the incidence of ghost fishing worldwide.

The implementation of the GGGI Best Practice Framework for the Management of Fishing Gear must include, at a minimum, the application to the FAO Global Voluntary Guidelines on the Marking of Fishing Gear by Member States, to be adopted at the forthcoming FAO Committee of Fisheries Meeting (9-13 July 2018, Rome), support for the development of infrastructure for Port Reception Facilities to ensure the disposal of redundant fishing gear and marine litter in port, and programs for ghost gear retrieval from identified hotspots.

Given that there is a shortage of data regarding the scope and scale of ADLFG and its impacts, the GGGI, through its Building Evidence Working Group, has also developed a robust data portal with over 300,000 unique records on ghost gear worldwide so that baselines can be formulated and assessed to better inform systemic policies that address the combat of marine debris. Therefore, the GGGI Building Evidence Working Group can serve as a reference to response options and associated costs on the issue of ghost gear at all levels.

Our views on the feasibility of different response options

If ocean productivity, in terms of quantity, quality and safety, is a serious concern then ghost fishing gear must be at, or near, the top of our priority list. Alternatively, if priority is based on a differentiation by ease of action or likely success of action, keeping in mind that maintaining momentum in the implementation of SDG 14 is paramount and therefore early success is essential, ghost fishing gear must again be at the top of the priority listing.

- ✓ Thanks to the 2009 FAO/UNEP study[2] it is clear what action needs to be taken to both prevent fishing gear from being lost or discarded and how existing ghost gear can be removed;
- ✓ Through each annual Sustainable Fisheries resolution since 2009 all UN Member States have already committed to taking urgent action and implement the FAO/UNEP recommendations;
- ✓ Effective action on ghost fishing gear is policy-heavy and means of implementation-light; and
- ✓ With the launch of the Global Ghost Gear Initiative (GGGI) in September 2015 there is now a multi-stakeholder public-private partnership through which action on ghost gear can be coordinated and which can act as a clearing house for information, knowledge, capacity-building and technology exchange.

Therefore, whereas prioritizing land-based sources of marine debris appears to be a logical choice because of the size of the problem, alternate approaches to prioritization suggest that the issue of ALDFG or ghost fishing gear must be recognized as an issue where action can be taken quickly and effectively on a global scale and where success will have a distinct and substantial impact on the achievement of SDG 14.

Finally, in the interest of coherence, prioritizing action on ALDFG or 'ghost gear' will produce positive impacts on several targets of Sustainable Development Goal 14 as ALDFG is by far the most destructive form of marine debris (target 14.1); is a major cause of global fish stock level decline (target 14.4); has a severe impact on marine ecosystems and is a substantive source of marine plastics (target 14.2); and is strongly related to resolving the issue of illegal, unreported and unregulated (IUU) fishing (target 14.6). Moreover, effective global action on ALDFG will enhance fish stock recovery, reduce micro-plastic accumulation in the human food chain and substantially reduce waste generation and therefore contributes to the achievement of Sustainable Development Goals 2, 3 and 12.

[2] http://www.fao.org/docrep/011/i0620e/i0620e00.htm

We urge UNEP as custodian of SDG target 14 to take the above into account in its formulation of a global governance framework for the management of marine litter, complementary to FAO's global programme of work on ALDFG, so that action on ALDFG can be prioritised.

The Global Ghost Gear Initiative acts as a clearinghouse mechanism and offers relevant insights on the feasibility of different response options on the issue of ALDFG. Its operational model encourages political will and strengthens governance to address ALDFG, both considered cross-cutting barriers to combating marine litter and microplastics. The GGGI serves as a model from which lessons can be derived in the process of overcoming barriers.

[i] The Ocean Cleanup, (press release) Great Pacific Garbage Patch Growing Rapidly, March 2018.
[ii] Findings established through an extensive literature review by scientists at the Marine Biology & Ecology Research Centre, Plymouth University, UK, which examined documented interactions between marine animals and debris, including ghost fishing gear. Gall, S. C. & Thompson, R. C. The impact of debris on marine life. Mar. Pollut. Bull. 92, 170–179 (2015).
[iii] Secretariat of the Convention on Biological Diversity. Impacts of Marine Debris on Biodiversity: Current Status and Potential Solutions. CBD Tech. Ser. No. 67 (2012).
[iv] Secretariat of the Convention on Biological Diversity. Marine debris: Understanding, preventing and mitigating the significant adverse impacts on marine and coastal biodiversity. CBD Technical Series (2016). doi: 10.1080/14888386.2007.9712830
[v] UNEP. Regional Action Plan on Marine Litter Management (RAPMaLi) for the Wider Caribbean Region 2014. (2014).
[vi] NOAA. Impact of "Ghost Fishing" via Derelict Fishing Gear. 25p (2015).
[vii] Macfadyen, Graeme;Huntington, Tim;Cappell, R. Abandoned, lost or otherwise discarded fishing gear. FAO Fisheries and Aquaculture Technical Paper 523 523, (2009).
[viii] Werner, S. et al. Harm caused by Marine Litter - European Commission. JRC Technical Report (2016). doi:10.2788/690366.