

01 December 2025

IOTC CIRCULAR

2025-39

Dear Sir/Madam

INTERSESSIONAL DECISION ON THE DELAYED IMPLEMENTATION OF THE DFAD REGISTER

An intersessional decision has been taken regarding the delayed implementation of the DFAD Register, following the process initiated by the Commission Chair's letter (IOTC-2025-3017). The Maldives and Thailand provided feedback on the request from the European Union, and the decision, based on consultation among the concerned parties, is as follows.

1. **A Pilot testing phase for the DFAD register will commence from 1 December 2025** to all interested parties and will remain open until the formal launch of the register.
2. **A mandatory testing phase for the DFAD register will commence on 1 February 2026 and continue till 31 May 2026.** All fishing fleets that deploy DFADs will be required to use the system during this testing phase. CPCs are encouraged and expected to provide feedback to the developers through the Secretariat during this phase. The Secretariat will give more information about the feedback procedures in due course.
3. The Commission in 2026 will further consider any technical issues related to the implementation of the DFAD Register, based on a Report from the Secretariat on the testing phase of the DFAD Register and a paper from the European Union based on implementation experience. Any other interested CPCs may also table documents for consideration by the Commission on the same subject matter.
4. **The DFAD Register will enter into full effect on 1 June 2026 and will become mandatory for all CPCs that fall within the ambit of Resolution 24/02.**

Yours sincerely

Mr Adam Ziyad

Chairperson

Attachments:

- Annex1: Letter from the EU
- Annex2: Letter from the Maldives

Distribution

IOTC Contracting Parties: Australia, Bangladesh, China, Comoros, European Union, France (Territories), India, Indonesia, Iran (Islamic Rep of), Japan, Kenya, Rep. of Korea, Madagascar, Malaysia, Maldives, Mauritius, Mozambique, Oman, Pakistan, Philippines, Seychelles, Somalia, South Africa, Sri Lanka, Sudan, United Rep. of Tanzania, Thailand, United Kingdom, Yemen. **Cooperating Non-Contracting Parties:** Liberia, Panama. **Intergovernmental Organisations, Non-Governmental Organisations. Chairperson IOTC. Copy to:** FAO Headquarters, FAO Representatives to CPCs.

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EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

International Ocean Governance and Sustainable Fisheries
Regional Fisheries Management Organisations

Brussels
MARE.B.2/BM

Mr. Adam Ziyad
Chair of the Indian Ocean Tuna
Commission
adam.ziyad@fisheries.gov.mv

Subject: Implementation of the DFAD Register

Dear Ziyad,

The EU has been closely involved in the development of the Register from its early stages and has contributed significant financial and technical resources to support its creation. We remain strongly committed to ensuring its successful deployment and use. Against this background, the request for a slight postponement of its full deployment is not an attempt to shy from our responsibility, but rather a pre-condition that the Register works from the outset and no major disruption could affect its credibility vis-à-vis operators and CPCs.

As implementation work progresses, and based on exchanges with operators, administrations, and relevant experts, it has become clear that several operational aspects of the system would benefit from further clarification before the Register can be fully implemented. The Commission's meeting in May in the Maldives offers an appropriate opportunity to address outstanding questions and ensure a harmonised and workable implementation for our operators.

In particular, we would like to highlight the following elements which still require clarification:

- Timelines and procedures for validation by national administrations of the data submitted by the fleet; this includes the categorisation of the status of DFAD data, and their potential use by other CPCs, during the period between submission and validation. To this end, the categorisation of the different Users ('master of the vessels', 'company', 'administration') needs to be clarified.
- The absence of an agreed failure or contingency protocol. A system-wide response is needed for cases where the platform is unavailable or when authorised vessels face technical constraints preventing real-time registration. The EU will submit a working paper to the upcoming WPICMM to support discussion on this element.
- Technical requirements relating to DFAD marking. The current provisions do not sufficiently specify how physical marking will work in practice (material, size,

place of marking) and this element is important to make sure that both the substance and the spirit of the resolution are complied with, while ensuring a level playing field among operators.

- The possible automatic connection between the Register and the already existing vessels' declaratory tools through an upload system that would avoid inefficient double declarations.
- A common understanding involving the IOTC Secretariat on the management and potential release of confidential business or personal information in line with the applicable Confidentiality Rules and Procedures.
- The possibility of pre-recording certain information prior to departure and pre-configuration of IDs. The management of IDs and the cessation process by the Secretariat must also be defined.

In addition, potential issues will only become fully visible through the operational use of the system. For this reason, we consider it essential to allow a structured transition period during which the Register is used and tested while ensuring that expected compliance obligations are realistic and clearly defined for all users. It is equally important that both the administrations and the operators can test the platform onshore, prior to its use on vessels, in order to identify and address potential issues in advance and to train captains and crews in the use of this new declaratory tool and its procedures.

For all the above-referred reasons, we propose that its use should remain mandatory as of 1 February and that in the period between February and the end of May CPCs would be encouraged to provide feedback on the effectiveness and usability of the system, including any technical or procedural issues experienced by administrations or operators. In parallel, the EU would commit to submitting a paper summarising our implementation experience and the lessons learned, with the objective of allowing the Commission to clarify those implementation issues identified. We would also ask the Secretariat to provide the Commission with a specific presentation on the first phase of implementation, based on the feedback received till the end of April.

In recognition of the concerns expressed by the Maldives, we could suggest a postponement of the full entry into effect of the Register to 1 June. While the date is later than expected by the Maldives, the identified process would still allow the Commission to receive detailed feedback and information on the implementation of the tool, while creating all the necessary conditions to ensure legal certainty at its entry into effect.

Yours sincerely,

Marco VALLETTA

Head of the EU delegation
to the IOTC

Re: IOTC - Implementation of the DFAD Register - Ares(2025)10136651

From Hussain Sinan <hussain.sinan@fisheries.gov.mv>

Date Wed 2025-11-26 08:29

To Adam Ziyad <adam.ziyad@fisheries.gov.mv>

Cc DeBruyn, Paul (NFITD) <Paul.DeBruyn@fao.org>; Maleeha Haleem <maleeha.haleem@fisheries.gov.mv>; Munshida Ibrahim <munshidha.ibrahim@fisheries.gov.mv>; EUROPEAN UNION HOD: Marco Valetta <marco.valletta@ec.europa.eu>

Dear Chair,

The Maldives wishes to thank the European Union for its detailed letter dated 21 Nov 2025, and for the constructive and flexible approach it has demonstrated in addressing the challenges that have emerged in the development of the IOTC DFAD Register.

We appreciate that the EU has taken into account the concerns previously expressed by the Maldives, while also proposing a realistic and workable way forward that maintains momentum toward the full operationalisation of the DFAD Register.

After careful consideration of the EU's proposal, and although it is not ideal and will delay full operationalisation of the Register, the Maldives can agree to the following arrangements:

1. The DFAD Register shall become mandatory as of 1 February 2026, with a structured transition and feedback period running from February to the end of May 2026, during which CPCs are strongly encouraged to actively use the platform and to report any technical, procedural or operational issues encountered;
2. The IOTC Secretariat be requested to establish a dedicated user-friendly feedback mechanism (e.g. a standardised template and/or an online submission form) to ensure that experiences and suggestions from administrations and operators are collected in a systematic and comprehensive manner;
3. The Secretariat prepare and present a detailed report on the initial phase of implementation, based on the feedback received, at the Commission in May 2026.

We also welcome the EU's commitment, to submit a paper summarising its own implementation experience and the lessons learned, which will be of great value to the Commission in addressing any outstanding issues and finalising any necessary adjustments.

In light of the process outlined above, despite our reservations on the significant delay this decision would cause, the Maldives is willing to compromise and can accept the postponement of the full entry into effect of the DFAD register to 1 June 2026.

Thank you and the EU for proactive and constructive dialogue.

Best Regards,

HS

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Hussain Sinan, PhD

Director General,
Fisheries and Ocean Resources Management



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