



**TECHNICAL AND COMPLIANCE COMMITTEE**

**Twenty-First Regular Session**

**24 September to 30 September 2025**

**Pohnpei, Federated States of Micronesia (Hybrid)**

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**UPDATE ON REVIEW OF CMM 2017-04 MARINE POLLUTION**

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**WCPFC-TCC21-2025-DP05**

**30 August 2025**

**Submitted by Canada**

## Update on the informal intersessional process to review the marine pollution measure

### Submitted by Canada

#### Purpose

1. The purpose of this paper is to provide TCC21 with an update on the progress of the informal intersessional process to review the marine pollution measure.

#### Background

2. The conservation and management measure on marine pollution states that the measure will be reviewed by the Commission every 3 years to consider expanding its scope with respect to the elimination of marine pollution caused by fishing vessels (paragraph 12 of [CMM 2017-04](#)).
3. In 2024, Canada submitted a proposal to WCPFC21 to amend the conservation and management measure on marine pollution ([WCPFC21-2024-DP04](#)).
4. WCPFC21 requested interested CCMs to work on the marine pollution issue in 2025 and 2026 in light of WCPFC-2024-DP04, and to develop a proposal to amend CMM 2017-04 for submission to TCC22 in 2026 with a view to adopt a measure by WCPFC23 (paragraph 605 of [WCPFC21 Summary Report](#)).
5. In January 2025, [WCPFC Circular 2025-03](#) was shared with CCMs and Observers seeking expressions of interest for participation in an intersessional review of CMM 2017-04.
6. Canada initiated the review by seeking written feedback on WCPFC-2024-DP04 and in June 2025, circulated the feedback received and identified key themes of the review, including:
  1. Definitions
    - a. fishing gear, including Abandoned, Lost and Discarded Fishing Gear (ALDFG).
    - b. garbage and explore option to differentiate biodegradable and treatable garbage (food waste, paper, cardboard) from non-biodegradable/requiring treatment garbage (oil or fuel products, all other domestic waste, incinerator ashes, sewage, plastics, metals, batteries and e-waste).
    - c. open burning and noise pollution.
    - d. plastics.
  2. Scope of measure
    - a. area of application and its alignment with other international instruments.
    - b. language to clearly reference the work FADMO-IWG.
  - c. scope of prohibition on marine pollution, including ALDFG, plastics, garbage, e-waste, emissions, and noise.

3. Management

- a. reporting requirements and timelines.
- b. improvements to provisions on adequate port reception facilities.
- c. provisions to address at-sea activities to ensure measure does not incentivize discharge at sea.
- d. implementation and review timelines.

- 7. In June 2025, participants were invited to provide input on the draft text and the feedback received to date.
- 8. The latest version of the text, including all the feedback received to date, is in **Annex 1**.
- 9. A provisional schedule for the informal intersessional process to review the marine pollution measure in 2026 is as follows:

Date	Task
January-March	Revised text (based on 2025 input) circulated for review; approximately 30-days will be given to participants to provide input
April-June	Canada to collate input received and recirculate for participants to have an opportunity to react to first round of input in 2026; approximately 30-days will be given to participants to provide input
September	Update to be provided to TCC22
October-November	Revised text circulated for review and submitted to WCPFC23
December	Adopt revised marine pollution measure at WCPFC23

- 10. Should other CCMs and Observers be interested in contributing to the review moving forward, please share relevant contact information with Felicia Cull ([Felicia.Cull@dfo-mpo.gc.ca](mailto:Felicia.Cull@dfo-mpo.gc.ca)), and copy WCPFC Compliance Manager, Lara Manarangi-Trott ([lara.manarangi-trott@wcpfc.int](mailto:lara.manarangi-trott@wcpfc.int)).

Text <i>[Proponent: (source) amendment]</i>	Canada	China	FFA	Japan	New Zealand	PNAO	Observers
<b>Preamble</b>							
<i>The Commission for the Conservation and Management of Highly Migratory Fish Stocks in the Western and Central Pacific Ocean</i>							
<i>Concerned that marine pollution is increasingly recognised as a significant global problem, with detrimental impacts on ocean and coastal environments, wildlife, economies and ecosystems,</i>							
<i>Recalling paragraph (e) of Article 5 of the WCPFC Convention which states that members shall adopt measures to minimize waste, discards, catch by lost or abandoned gear, pollution originating from fishing vessels, catch of non-target species, both fish and non-fish species, and impacts on associated or dependent species, in particular endangered species and promote the development and use of selective,</i>							

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environmentally safe and cost-effective fishing gear and techniques;							
<i>Recalling</i> that the need to prevent and significantly reduce marine pollution of all kinds was affirmed at the United Nations Conference to Support the Implementation of Sustainable Development Goal 14 through the adoption of paragraph 13(g) of the ‘Our ocean, our future: call for action’ declaration;							
<i>Convinced</i> that certain activities associated with fishing may affect the Western and Central Pacific marine environment and that these activities may play a notable role in WCPFC’s efforts to minimise incidental mortality of non-target species and impacts on marine ecosystems,							
<i>Noting</i> that abandoned, lost or otherwise discarded fishing gear in the marine environment can							

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damage marine, reef and coastal habitats, be harmful to marine life through ghost fishing, entanglement, ingestion and acting as habitat for the spread of invasive species, and create a navigation hazard,							
<i>Noting</i> that the provisions of Annex V of International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 relating thereto and by the Protocol of 1997 (MARPOL), prohibit the disposal of all fishing gear and plastics at sea,							
<i>Further noting</i> that the provisions of Annex I, Annex IV and Annex VI of MARPOL manage and restrict the discharge of oil, sewage and air pollutants from ships at sea,							
<i>Noting</i> that there is limited monitoring and implementation of MARPOL obligations on fishing vessels, and consequently little							

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information exists about illegal pollution activities by fishing vessels at sea,							
<i>Further</i> noting that the Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter 1972 (London Convention) and the 1996 Protocol (London Protocol) manage or prohibit through regulation the dumping into the sea of wastes or other matter,							
<i>[Acknowledging the consensus emerging from the Global Plastics Treaty negotiations on the importance of addressing plastic pollution,]</i>			Please make reference to relevant decisions from the Plastics Treaty.				
<i>[ANCORS: Recognising that anthropogenic underwater noise from fishing vessel operations, particularly from vessel engines, propeller cavitation, sonar, and fish-finding technologies, is increasingly recognised as a pollutant under</i>	Canada is supportive of efforts to reduce underwater vessel noise. While the IMO recognizes the issue of underwater vessel noise and its harmful impacts on aquatic ecosystems, it stops short of qualifying it as "pollution". Should members choose to	We note the concerns raised regarding the potential threat of "underwater noise" from fishing vessel operations to marine ecosystems. However, the specific impacts of fishing vessel noise on highly migratory species such as tuna under the jurisdiction of					ANCORS: Insert paragraphs after the MARPOL/London Convention references

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<p>international and regional frameworks, and is a growing threat to marine ecosystems, disrupting communication, navigation, and feeding behaviours of cetaceans, fish, and other marine species;]</p>	<p>include underwater noise within the scope of the measure, we would recommend changing references to “underwater noise pollution” to “underwater noise” or “underwater noise impacts”.</p> <p>There is certainly a growing body of evidence that indicates that a large contributor to underwater noise, both globally as well as in many local contexts, is fishing vessels and we would welcome a measure that seeks to mitigate/reduce underwater noise.</p>	<p>the WCPFC are currently unclear, and there is a lack of sufficient scientific evidence.</p> <p>In our fishing practices, particularly for tuna longline and purse seine vessels, we have not observed any significant impact of operational noise on target species or other marine life. Tuna fishing vessels operate at relatively low speeds, with correspondingly low noise levels from engines and propellers, and the setting of hooks and purse seine is not a significant source of noise. Therefore, these operations should not be categorized as "chronic noise pollution."</p> <p>Given the circumstances, we believe it is premature to include issues related to noise in the preambular section before clear and specific scientific</p>					

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		advice is available. We recommend that the SC undertake targeted research on the potential impacts of fishing vessel noise on tuna stocks and marine ecosystems in the convention area. Any future management measures shall be based on the best available scientific and SC recommendations.					
<i>[ANCORS: Noting the International Maritime Organization's (IMO) 2023 Revised Guidelines for the Reduction of Underwater Radiated Noise from Shipping to Address Adverse Impacts on Marine Life (MEPC.1/Circ.906) provide a framework for mitigating noise impacts through technical and operational measures and encourage their application to fishing vessels where feasible;]</i>		Disagree. Same opinion as above.					
<i>[ANCORS: Acknowledging that the Convention on</i>		Disagree. Same opinion as above.					

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Migratory Species (CMS), the Convention for the Protection of the Marine Environment of the North-East Atlantic (OSPAR), and the General Fisheries Commission for the Mediterranean (GFCM), have recognised underwater noise as a form of marine pollution requiring monitoring and management;]							
<p><i>[ANCORS: Recalling Article 5(e) of the WCPFC Convention which calls for the adoption of measures to minimize pollution originating from fishing vessels, the application of the precautionary approach under Article 5(c), and the use of best scientific evidence under Article 5(b);]</i></p> <p>Chair: Consider merging with third preambular paragraph.</p>		Same opinion as above. Additionally, the reference in this preface is unclear - what type of pollution is being referred to? Is it related to underwater noise? If so, we disagree.					
<i>[ANCORS: Concerned that chronic noise pollution in the Western and Central Pacific Ocean (WCPO)</i>		Disagree. Reason as before mentioned.					

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may exacerbate stressors on migratory species, including tuna and cetaceans, and undermine the Convention’s objectives under Article 5(d–f);]							
[ANCORS: <i>Recognizing</i> the special vulnerability of Small Island Developing States (SIDS) and Territories to the impacts of underwater noise, which may interfere with traditional and subsistence fisheries, marine biodiversity, and cultural heritage;]		If SIDS agrees with the wording of this paragraph, then we have no objection.					
[ <i>Recalling</i> the Advisory Opinion issued by the International Tribunal for the Law of the Sea (ITLOS) which affirmed that Parties to the United Nations Convention on the Law of the Sea (UNCLOS) have specific obligations to prevent, reduce, and control [NZ: marine] pollution [NZ: of the marine environment] from anthropogenic		We believe that directly incorporating the issue of GHG emissions from fishing vessels into the preamble of the WCPFC (Western and Central Pacific Fisheries Commission) is debatable for the following reasons: Firstly, from the perspective of global GHG emissions, the contribution of fishing vessels is relatively small. Existing studies indicate that carbon	Please make reference to the decisions made by the ITLOS Advisory Opinion on the Responsibilities of States regarding Climate Change.		New Zealand supports FFA’s request to reference decisions made by the ITLOS advisory opinion. “Pollution of the marine environment” is a defined term under UNCLOS and the relevant obligation in article 194 of UNCLOS is “to prevent, reduce and control pollution of the marine environment from any source”, which the ITLOS AO		

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greenhouse gas emissions,]		<p>emissions from fishing vessels account for a small proportion of total global emissions, significantly less than land-based sources and large merchant vessels. Highlighting this issue disproportionately in the WCPFC preamble might not align with its actual impact.</p> <p>Secondly, the core mandate of the WCPFC is the conservation and management of highly migratory fish stocks in the Western and Central Pacific Ocean, ensuring the sustainable utilization of fishery resources. Its primary focus should remain on fisheries management measures such as catch quotas, fishing effort limits, gear restrictions, and combating illegal, unreported, and unregulated (IUU) fishing. While GHG emissions are related to marine environmental health, their management and reduction mechanisms</p>			found includes GHG emissions.		

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		<p>are more appropriately addressed by specialized international frameworks and bodies like the UNFCCC and its Paris Agreement, and the International Maritime Organization (IMO). The WCPFC should avoid overlapping functions and duplicating efforts, which could divert its attention from its core fisheries management tasks.</p> <p>Furthermore, although the ITLOS advisory opinion confirms that GHG emissions constitute marine pollution, there is currently insufficient and specific scientific evidence regarding the direct, quantifiable impact of fishing vessel emissions on specific fishery resources under WCPFC jurisdiction, such as tuna. Without clear scientific studies demonstrating direct, quantifiable negative impacts of fishing</p>					

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		<p>vessel GHG emissions on tuna stocks or their habitats, making it a primary concern in the WCPFC preamble may lack a solid scientific foundation.</p> <p>Finally, prematurely imposing GHG emission reduction requirements on fishing vessels could place an undue burden on fishing livelihoods and food security. This is particularly true for developing countries and Small Island Developing States (SIDS), whose fishing sectors may lack the necessary technical and economic capacity to rapidly adapt to new emission reduction standards. In the absence of clear scientific justification, feasible technical solutions, and adequate transition periods, this could negatively impact communities reliant on fisheries.</p> <p>Therefore, we suggest that the WCPFC</p>					

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		<p>Scientific Committee could consider initiating a dedicated study to assess the specific impacts of fishing vessel GHG emissions on Western and Central Pacific fishery resources and marine ecosystems. Until the results of such studies are clear, we believe it is not appropriate to include the issue of fishing vessel GHG emissions in the WCPFC preamble. Instead, the WCPFC should continue to focus on its core responsibilities in fisheries management and collaborate with other relevant international organizations to address the broader impacts of climate change on the ocean.</p>					
<p><i>Recalling</i> that information from observer reports suggests that fishing vessels are responsible for significant amounts of marine pollution in the Western and Central</p>							

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Pacific Ocean, even when observers are aboard, and that marine pollution is likely to be even more significant on fishing vessels, particularly longline fishing vessels, where observer coverage is very low,							
<i>[Recognizing the work undertaken by the Fish Aggregating Device Management Options Intersessional Working Group (FADMO-IWG) to improve the management of Fish Aggregating Devices (FADs),]</i>			Please make reference to the work undertaken by the FAD Management Options Intersessional Working Group.				
<i>Recognising that Article 30(1) of the Convention requires the Commission to give full recognition to the special requirements of developing States that are Parties to the Convention, in particular the small island developing States (SIDS) and Territories, in relation to the conservation and management of highly migratory fish stocks in the Convention Area</i>							

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and development of fisheries for such stocks;							
<i>Recognising</i> further that Article 30(2) of the Convention requires the Commission to take into account the special requirements of developing States, in particular SIDS and Territories. This includes ensuring that conservation and management measures adopted by it do not result in transferring, directly or indirectly, a disproportionate burden of conservation action onto developing States Parties, and Territories,							
<i>Recalling</i> the adoption of CMM 2013-07 which also recognises the special requirements of SIDS and territories:							
<b>Adopts, in accordance with Article 5 (d-f) and 10 (1)(h) of the Convention that:</b>							
<b>Definitions</b>					The definitions need further consideration to check for consistency with other international obligations.		

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1. For the purposes of this measure, the following definitions will apply:							
<p>[(MARPOL) Fishing gear: any physical device or part thereof or combination of items that may be placed on or in the water or on the sea-bed with the intended purpose of capturing, or controlling for subsequent capture or harvesting, marine or fresh water organisms [PNAO: and that poses a significant risk of ghost fishing when abandoned, lost or discarded.]]</p> <p>Chair: Consider the MARPOL definition of fishing gear.</p>	<p>Canada is supportive of including definitions of ALDFG in the definition section.</p> <p>Canada supports excluding FADs if the work of the FADMO-IWG is appropriately considered within the measure.</p> <p>Canada is not supportive of including a significant risk of ghost fishing qualifier to ALDFG, as this has yet to be well established. ALDFG may also pose risks to the environment, adding to marine pollution, and to navigational safety.</p> <p>Canada is of the view that fishing gear should be defined based on its purpose rather than based on the risk/impacts, which is not clearly understood.</p>	<p>we believe that the existing definitions from MARPOL and SPRFMO may be overly broad and do not adequately consider the specific characteristics of tuna longline fisheries within the WCPFC Convention Area. For instance, when a vessel cuts a shark loose from a longline, leaving a hook and some line with the shark, or when a hook or branchline are bitten off, should these situations be considered abandoned, lost, or discarded fishing gear? More specifically, is it intended that such fishing gear events are subject to the proposed reporting and other control measures?</p> <p>We contend that longline fisheries do not, to a significant extent, pose a substantial risk of ghost</p>	<p>Request including clear and standalone definitions for the following terms:</p> <ul style="list-style-type: none"> <li>- Abandoned Fishing Gear</li> <li>- Discarded Fishing Gear</li> <li>- Lost Fishing Gear</li> </ul> <p>A possible approach for these can be those used by SPRFMO.</p>		<p>While fishing gear is covered in para 5, it might be useful to consider providing a definition of fishing gear in this paragraph to distinguish between abandoned, lost and discarded fishing gear – and it will be important to be consistent with other international requirements. SPRFMO has the following definitions:</p> <p><a href="https://sprfmo.int/assets/Fisheries/Conservation-and-Management-Measures/2022-CMMs/CMM-17-2022-Marine-Pollution-7Mar22.pdf">https://sprfmo.int/assets/Fisheries/Conservation-and-Management-Measures/2022-CMMs/CMM-17-2022-Marine-Pollution-7Mar22.pdf</a></p> <p><i>“Abandoned fishing gear” means fishing gear deliberately left at sea by the vessel due to force majeure or other unforeseen reasons.</i></p> <p><i>“Lost fishing gear” means fishing gear over</i></p>	<p>Some form of definition seems to be needed for lost, abandoned or discarded fishing gear for practical purposes. For example, when a vessel cuts a shark loose from a longline leaving a hook and some line with the shark; or when a hook or branchline are bitten off - is that abandoned, lost or discarded fishing gear? More specifically, is it intended that such fishing gear events are subject to the reporting and other controls proposed? The ICCAT measure provides an example of a definition for this purpose which may be useful: <i>fishing gear is understood to mean fishing gear that poses a significant risk of ghost fishing when abandoned, lost or discarded in the ICCAT Convention.</i>”</p>	

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		<p>fishing. The nature of longline gear dictates that its continuous fishing capability, once lost or abandoned, is very limited. Unlike some other gear types (e.g., gillnets), the fishing efficiency of longlines is highly dependent on active operation and timely retrieval by the vessel. Once detached from the vessel's control, their fishing capacity rapidly diminishes, resulting in relatively minor long-term impacts on the marine ecosystem.</p> <p>Therefore, we suggest that WCPFC, when developing relevant definitions, could refer to the ICCAT (International Commission for the Conservation of Atlantic Tunas) measure, which provides a more targeted definition: "fishing gear is understood to mean fishing gear that poses a significant risk of ghost</p>			<p><i>which the vessel has accidentally lost control and cannot be located and/or retrieved.</i></p> <p><i>"Discarded fishing gear" means fishing gear released at sea without any attempt for further control or recovery by the vessel.</i></p>		

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		fishing when abandoned, lost or discarded in the ICCAT Convention Area.” This wording emphasizes the crucial element of “significant ghost fishing risk,” allowing for more accurate identification and management of fishing gear events that genuinely threaten marine ecosystems, while avoiding unnecessary burdens on gear types with low ghost fishing risk, such as longlines.					
[FFA and New Zealand: (SPRFMO) Abandoned fishing gear: fishing gear left at sea due to force majeure or other unforeseen reasons.]	Canada’s Ghost Gear Program generally uses the FAO definitions found in the Voluntary Guidelines on the Marking of Fishing Gear <a href="https://openknowledge.fao.org/server/api/core/bitstreams/65cebd33-16c0-48ef-aded-1ea17b96589d/content">https://openknowledge.fao.org/server/api/core/bitstreams/65cebd33-16c0-48ef-aded-1ea17b96589d/content</a> ).						
[FFA and New Zealand: (SPRFMO) Discarded fishing gear: fishing gear released at sea without any attempt for further control or recovery by the vessel.]	“Abandoned fishing gear” means fishing gear over which that operator/owner has control and that could						
[FFA and New Zealand: (SPRFMO) Lost fishing gear: fishing gear over which							

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<p>the vessel has accidentally lost control and cannot be located and/or retrieved.]</p> <p>Chair: Consider ALDFG definitions that would best apply to WCPFC fisheries.</p>	<p>be retrieved by owner/operator, but that is deliberately left at sea due to force majeure or other unforeseen reasons.</p> <p>“Lost fishing gear” means fishing gear over which the owner/operator has accidentally lost control and that cannot be located and/or retrieved by the owner/operator.</p> <p>“Discarded fishing gear” means fishing gear that is released at sea without any attempt for further control or recovery by the owner/operator.</p> <p>These definitions are very similar to those of SPRFMO and we would be supportive of either approach, including the exclusion of FADs.</p>						
<p>a. (MARPOL) E-waste: electrical and electronic equipment used for the normal operation of the vessel or in the accommodation spaces,</p>							

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including all components, subassemblies and consumables, which are part of the equipment at the time of discarding, with the presence of material potentially hazardous to human health and/or the environment.							
<p>b. (WCPFC) Garbage: includes unusable fishing gear, oil or fuel products, oily residues, sewage, food waste, domestic waste, incinerator ashes, cooking oil.</p> <p><i>[b.bis New Zealand: (MARPOL) Garbage: all kinds of food, domestic and operational waste, all plastics, cargo residues, incinerator ashes, cooking oil, fishing gear, and animal carcasses generated during the normal operation of the ship and liable to be disposed of continuously or periodically.]</i></p>	<p>Canada supports New Zealand’s suggestion to amend the definition to align with MARPOL’s definition of garbage.</p> <p>We also support the FFA’s suggestion on exploring the option of differentiating biodegradable/ treatable garbage from nonbiodegradable/ requiring treatment garbage.</p>	<p>We agree with the Chair's view on distinguishing between different types of waste, especially biodegradable and non-biodegradable waste. Regarding the food, the Simplified overview of the discharge provisions of the revised MARPOL Annex V which entered into force on 1 March 2018 clearly stipulates that Food waste can be discharged beyond 12 nautical miles, and Animal Carcasses (should be split or otherwise treated to ensure the carcasses will sink immediately) Must be en route and as far from the nearest land as possible.</p>	<p>Explore the option of differentiating biodegradable treatable garbage (food waste, paper, cardboard), from non-biodegradable/ requiring treatment garbage (oil or fuel products, all other domestic waste, incinerator ashes, sewage, plastics, metals, batteries and e-waste).</p>		<p>It would be preferable to use a consistent and internationally recognised definition for “garbage” such as that used by MARPOL.</p> <p>Under MARPOL Annex V, garbage includes “<i>all kinds of food, domestic and operational waste, all plastics, cargo residues, incinerator ashes, cooking oil, fishing gear, and animal carcasses generated during the normal operation of the ship and liable to be disposed of continuously or periodically.</i>”</p>		

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Chair: Consider definition of garbage and explore option to differentiate types of garbage.		Therefore, food are classified as dischargeable.					
<p>c. [(FAO) Open burning: uncontrolled combustion of garbage, e-waste, plastics, or fishing gear without emissions control.]</p> <p>Chair: Consider definition and inclusion of open burning.</p>	<p>To add clarity and align with MARPOL obligations, we suggest changing the FAO’s definition of open burning to MARPOL’s definition of incineration and reframe the prohibition to only permit incineration as would be permitted under applicable international instruments.</p> <p>Canada believes there is an important difference between open burning and incineration. Open burning results in air pollution that can be harmful to the environment (<a href="https://www.canada.ca/en/environment-climate-change/services/managing-reducing-waste/municipal-solid/environment/open-burning-garbage-health-risks.html">https://www.canada.ca/en/environment-climate-change/services/managing-reducing-waste/municipal-solid/environment/open-burning-garbage-health-risks.html</a>).</p>	<p>China respectfully address that the majority of fishing vessels possess limited spatial capacity, which poses significant challenges in installing large-scale waste processing apparatus and storing substantial volumes of daily refuse. Furthermore, such installations may introduce safety hazards to the vessels. Consequently, open-air burning remains an indispensable waste disposal method that shall be preserved.</p> <p>Should open-air burning be prohibited, China seeks clarification on the prescribed method for waste incineration. Specifically, are there particular requirements or recommended devices for waste</p>			<p>The proposed definition is unclear. As it is currently written, it insinuates that open burning with controlled combustion is acceptable?</p> <p>We propose using MARPOL’s definition of open burning, noting the same exemptions for consistency.</p> <p>We note that there are existing rules on shipboard incineration and waste disposal:</p> <p>MARPOL Annex VI Regulation 16 specifies that shipboard incineration shall be allowed only in a shipboard incinerator (or main auxillary power plant or boilers for certain wastes). New Zealand’s Marine Protection Rules Part 199.143 and 199.443 specify the</p>		

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	<p>Whereas, incineration is permitted under MARPOL.</p> <p>Our intention with the inclusion of open burning was to mitigate the impacts of air pollution caused by fishing vessels.</p> <p>Open burning of waste aboard Canadian fishing vessels is not permitted under Canadian regulations. Additionally, Section 114 of the Vessel Pollution and Dangerous Chemicals Regulations prohibits incineration of waste on board unless it is carried out in a shipboard incinerator that meets regulatory standards (<a href="https://laws-lois.justice.gc.ca/eng/regulations/sor-2012-69/page-14.html#h-791296">https://laws-lois.justice.gc.ca/eng/regulations/sor-2012-69/page-14.html#h-791296</a>).</p>	<p>processing that could be employed?</p> <p>Additionally, noting that Canada operates fishing vessels in the North Pacific for albacore tuna, China inquires about the waste management practices employed by Canadian fishing vessels.</p> <p>It is also observed that fully enclosed incineration without air is infeasible. Any incinerator with an opening will inevitably produce emissions, the magnitude of which correlates with the quantity of waste incinerated rather than whether the process is conducted in open air.</p>			<p>requirements of shipboard incineration and gives effect to MARPOL in this regard.</p> <p>For ships built after 1 January 2000 (or incinerators installed after this date) they have to be approved incinerators.</p> <p>The definition of shipboard incineration from MARPOL Annex VI is ‘the incineration of wastes or other matter on board a ship, if such wastes or other matter were generated during the normal operation of that ship [<u>underlined for emphasis</u>]’.</p> <p>Assuming those wastes were generated during the normal operation of that ship, the waste specified under the proposal (fishing gear, e-waste, garbage, and plastics) are all included in the MARPOL Annex V definition of waste and cannot be disposed of</p>		

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Text <i>[Proponent: (source) amendment]</i>	Canada	China	FFA	Japan	New Zealand	PNAO	Observers
					on a vessel other than through appropriate incineration or disposal at port reception facilities.		
<p>d. (NPFC) <b>Plastics: a material which contains as an essential ingredient one or more high molecular mass polymers and which is formed during either manufacture of the polymer or the fabrication into a finished product by heat or pressures.</b></p> <p>d. alt [FFA: (WCPFC) <b>Plastics: includes plastic packaging, items containing plastic and polystyrene, but not including fishing gear.</b>]</p> <p>Chair: Consider definition of plastics. The MARPOL definition is “Plastic means a solid material which contains as an essential ingredient one or more high molecular mass polymers and which is formed (shaped) during either manufacture of the</p>	<p>Canada’s preference is to align the plastic definition with that adopted by the IMO as much as possible.</p> <p>Proposal: “Plastics: a solid material which contains as an essential ingredient one or more high molecular mass polymers and which is formed (shaped) during either manufacture of the polymer or the fabrication into a finished product by heat and/or pressure. Plastics include, though are not limited to, plastic packaging, items containing plastic and polystyrene.”</p>		<p>Suggest simplifying the definition of plastic by removing the NPFC definition, and instead use the existing reference outlined in paragraph 2 of the current measure (CMM 2017-04): “plastics includes plastic packaging, items containing plastic and polystyrene, but not including fishing gear”.</p>		<p>Consider using the MARPOL definition of plastic. “Plastic means a solid material which contains as an essential ingredient one or more high molecular mass polymers and which is formed (shaped) during either manufacture of the polymer or the fabrication into a finished product by heat and/or pressure.”.</p>		

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polymer or the fabrication into a finished product by heat and/or pressure. Plastics have material properties ranging from hard and brittle to soft and elastic. For the purpose of this annex, “all plastics” means all garbage that consists of or includes plastic in any form, including synthetic ropes, synthetic fishing nets, plastic garbage bags and incinerator ashes from plastic products”.							
[ANCORS: e. “Underwater noise [CA: pollution]” means energy from anthropogenic sources introduced into the marine environment that has the potential to cause harm to marine life, including but not limited to vessel engine noise, propellor cavitation, sonar use, echo sounders, and noise associated with fishing activities such as gear deployment and retrieval.]	Canada suggests removing “pollution”. While the IMO recognizes the issue of underwater vessel noise and its harmful impacts on aquatic ecosystems, it stops short of qualifying it as “pollution”.	We disagree with adding a definition of noise, as there is no recognized definition under the Commission's Convention. Currently, the scientific community's understanding of the specific impacts of fishing vessel noise on highly migratory fish species such as tuna under WCPFC jurisdiction remains unclear, with insufficient scientific evidence to support it.					ANCORS: Add definition of underwater noise pollution

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Chair: Consider inclusion of noise pollution.		<p>In fishing practices, particularly for tuna longline and purse seine vessels, we lack of scientific advice on any significant impact of operational noise on target fish species or other marine life. Tuna longline vessels operate at slow speeds, with relatively low noise from main engines and propellers, and the PS process produces no significant noise compared to commercial cargo vessel. Therefore, it should not be classified as 'persistent noise pollution.'</p> <p>We believe it is premature to introduce noise-related issues in the preamble before the SC provides clear and specific scientific advice on this matter.</p>					
<p><b>General Provisions</b></p> <p>Chair: Consider alignment with MARPOL requirements and reference to other international</p>					The proposed obligations must be clear about how they will fit with existing international requirements (for fishing vessels) such as		

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discussions such as the IMO work on gear marking and marine debris.					<p>MARPOL – in some places the proposed obligations go beyond existing MARPOL requirements.</p> <p>We also need to consider other current international discussions such as the IMO work on gear marking and marine debris.</p>		
<p>[1. bis This measure shall apply to the following categories of fishing vessels authorized to fish in the Convention Area:</p> <p>a. vessels fishing on the high seas in the Convention Area;  b. vessels fishing on the high seas and in coastal State EEZs;  c. vessels fishing in the EEZs of two or more coastal States; and  d. all fishing vessels on the WCPFC Record of Fishing Vessels.]</p> <p>[PNAO: 1.bis alt This measure shall apply to all vessels on the WCPFC Record of</p>	<p>Canada’s preferred scope is to include all vessels on the WCPFC RFV, regardless of where they operate. Rationale being that marine pollution is regardless of vessel size and where it is discharged. WCPFC’s mandate covers high seas and EEZs, unlike non-tuna RFMOs like NPFC and SPRFMO, so we hope CCMs will consider expanding the scope.</p> <p>Canada’s preference would be to reference the work of the FADMO-IWG rather than exclude it</p>	<p>Among all vessels listed in the WCPFC Record of Fishing Vessels, many do not operate in the Convention Area during a given year due to port repairs or maintenance. We suggest revising 'd. all vessels listed in the WCPFC Record of Fishing Vessels' to 'all vessels in the RFV list with annual Fished status.</p>	<p>There is a need to be more specific on the scope of the measure, and as written, the Measure (including the existing measure) applies to all fishing vessels flagged by a CCM and operating within the WCPFC Convention Area. This would mean extending the WCPFC compliance process to vessels fishing on other non-WCPFC regulated fisheries.</p> <p>FFA suggests:</p> <ul style="list-style-type: none"> <li>- the application of the measure to cover EEZ’s and High Seas within the CA</li> </ul>	<p>Addition of an area of application within the WCPFC Convention Area.</p> <p>“This measure shall apply to the following categories of fishing vessels authorized to fish in the Convention Area:</p> <p>a. vessels fishing exclusively on the high seas in the Convention Area; and  b. vessels fishing on the high seas and in coastal State EEZs; and  c. vessels fishing in the EEZs of two or more coastal States.”</p>	<p>It would also be useful to set out clearly the scope or area of application for this CMM. This could include the Convention Area (high seas and EEZs) – but excluding territorial seas and archipelagic waters – also all vessels on the WCPFC RFV.</p>	<p>Scope of the Measure:</p> <p>Area: for consistency with the NPFC and SPRFMO the measure should apply in the high seas of the WCPFC Convention Area  Vessels: The proposed revised CMM (and CMM 2017-04) apply to all fishing vessels “operating within the WCPFC Convention Area”. This would seem to include vessels covered by NPFC and SPRFMO. As we read it, this would mean that the reporting requirements in the proposed revision would result in an</p>	

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<p><b>Fishing Vessels fishing on the high seas in the Convention Area.]</b></p> <p>Chair: Consider area of application and its alignment with other international instruments. Consider language to reference the FADMO-IWG.</p> <p>Note that the scope of the ROP includes: a. vessels fishing exclusively on the high seas in the Convention Area; and b. vessels fishing on the high seas and in waters under the jurisdiction of one or more coastal States and vessels fishing in the waters under the national jurisdiction of two or more coastal States.</p>	<p>altogether, given linkages between marine pollution and FAD management.</p>		<ul style="list-style-type: none"> <li>- clearly excluding territorial seas and archipelagic waters from the scope,</li> <li>- the measure to apply to all vessels on the WCPFC Record of Fishing Vessels</li> </ul> <p>Suggests proponents to explore other ways to define the scope appropriately, eg. by looking at other measures such as the <a href="#">ROP</a>.</p> <p>The scope of this measure to clearly exclude FAD management, or to clearly reference to the FAD Management Options IWG, as in <a href="#">CMM 2023-01</a>.</p>			<p>obligation for WCPFC CCMs of vessels such as salmon and mackerel trawlers to provide reports to the WCPFC Secretariat and require the WCPFC compliance process to be extended to cover reporting by those vessels. We doubt the merit of that outcome.</p> <p>Instead, the requirements in the Measure should apply to all vessels on the WCPFC Record of Fishing Vessels.</p>	
<p><b>2. [(NEW) Provisions in this measure shall not prejudice the legitimate rights and obligations under international law of Commission Members, Cooperating Non-</b></p>	<p>Canada proposed this text to acknowledge that some CCMs are not a party to the international instruments referenced in the measure; however, we have no</p>		<p>This language is typically used in CMMs to protect the legitimate rights and obligations of SIDS under international law to develop their fisheries.</p>		<p>The intent of this paragraph is not clear. It would be useful to have WCPFC legal advice on the need for such a paragraph. Not sure that this kind of</p>		

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<p>Members and Participating Territories (CCMs).]</p> <p>Chair: Requesting WCPFC legal advice on whether this paragraph is required.</p>	<p>issue with removing this language.</p>		<p>eg. CMM 2023-01 para 5 “...nothing in this Measure shall prejudice the rights and obligations of those small island developing State Members and Participating Territories in the Convention Area seeking to develop their domestic fisheries”.</p> <p>In the context of this draft proposal, it would be useful to get clarification from the proponent regarding the intent of this paragraph.</p>		<p>paragraph has been used in other CMMs.</p>		
<p>2. bis [Japan: (ICCAT) For the purpose of this CMM, fishing gear is understood to mean fishing gear that poses a significant risk of ghost fishing when abandoned, lost or discarded in the WCPFC Convention Area.<sup>1</sup></p> <p><sup>1</sup> The provisions in this CMM do not apply to long line gear.]</p> <p>Chair: Consider definition of fishing</p>	<p>Canada supports the MARPOL definition of fishing gear and the inclusion of longline gear given risks associated with this gear type have yet to be clearly identified.</p> <p>A recent CSIRO article estimates that annually more than 740,000km of longlines, and nearly 14 billion longline hooks are lost (article is <a href="#">here</a>).</p>	<p>We have the same intervention with Japan.</p>		<p>Japan would like to propose this paragraph from ICCAT Rec. 19-11</p>		<p>The PNAO supports this proposal by Japan, although it seems more appropriate to place it in para 1 with definitions as indicated by the Chair and by the PNAO comment on para 1.</p>	

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gear and its inclusion in the definition section.	<p>The following project proposal on longline gear may help inform this review: <a href="#">(Rev.01) An assessment of the quantity and potential impact of abandoned, lost, or discarded pelagic longline fishing gear in the Western and Central Pacific Fisheries Convention Area   WCPFC Meetings</a></p> <p>Significant risk has not been defined, though Canada is of the view that a risk is present when ALDFG can:</p> <ul style="list-style-type: none"> <li>- ghost fish, entangle, or be ingested by an animal,</li> <li>- contribute to marine plastics, and</li> <li>- present a navigational hazard.</li> </ul>						
3. Commission Members, Cooperating Non-Members and Participating Territories (CCMs) that are							

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<p>entitled to ratify, accept, approve or accede to the annexes of MARPOL and the London Protocol are encouraged to do so at the earliest possible opportunity if they have not already done so. CCMs that experience difficulties in becoming Parties to the MARPOL or London Protocol are encouraged to inform the International Maritime Organization of the circumstances thereof, so that consideration can be given to take appropriate action in this respect, including providing necessary technical assistance.</p>							
<p>4. <del>FFA and CN: proposed for deletion</del> (NEW) The WCPFC Secretariat is encouraged to engage with the Secretariats of other international organizations, including Regional Fisheries Management Organizations, [ANCORS: IMO, and the CBD,] to discuss</p>	<p>We agree with the FFA and China.</p>	<p>China also proposed for deletion.</p>	<p>This is a general requirement across many areas of the Commission’s work, and does not see value in having it specified in the measure.</p>				<p>ANCORS: Amend Paragraph 4 to read as follows: “The WCPFC Secretariat is encouraged to engage with the Secretariats of other international organizations, including Regional Fisheries Management Organizations, IMO, and the CBD, to discuss shared challenges and</p>

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Text <i>[Proponent: (source) amendment]</i>	Canada	China	FFA	Japan	New Zealand	PNAO	Observers
shared challenges and identify potential pathways for cooperation on addressing marine pollution from fisheries [ANCORS: , including underwater noise pollution] .							identify potential pathways for cooperation on addressing marine pollution from fisheries, including underwater noise pollution.”
<b>Prohibition on Marine Pollution</b>							
<p>5. CCMs shall prohibit their fishing vessels operating within the WCPFC Convention Area from abandoning or discarding any fishing gear into the water, except where fishing gear is considered lost pursuant to Paragraph 7, or as would be permitted under applicable international instruments.</p> <p>i. Fishing gear attached to, or controlled from a vessel is not considered abandoned or discarded.</p> <p>[ii. Fishing gear such as FADs, traps, static nets, released from the</p>	<p>Canada supports moving all definitions to the definition section.</p> <p>Canada supports the exclusion of FADs in paragraphs ii. and iii. given work underway by the FADMO-IWG, though our preference would be to reference the work and commit to including text, as deemed appropriate by the FADMO-IWG, SC and TCC in future years.</p> <p>On the topic of whether longline gear poses a significant risk, please see comment above.</p>	<p>We agree with Japan's intervention, and the provision should also include the exceptions listed in MARPOL Annex V. The stipulation that "unrecovered fishing gear" is to be deemed abandoned may not be equitable in all circumstances. For instance, in the event of extreme adverse weather or unforeseen emergencies, crew members may be unable to retrieve fishing gear promptly. Such situations do not constitute intentional abandonment. Enforcing this regulation strictly could impose undue stress on</p>	<p>Please refer to comments on the scope of the measure, and on definitions and consider:</p> <ul style="list-style-type: none"> <li>- excluding reference to FADs (as they are managed by TTM and work underway by FADMO-IWG)</li> <li>- refer to the different definitions of abandoned, lost and discarded fishing gear in paragraph 1</li> </ul>	<p>Japan would like to propose this amendment. MARPOL Annex V prohibits from abandoning or discarding with some exemption.</p>	<p>As above on definitions – the references to abandoned fishing gear are not consistent with other international references. SPRFMO has defined “abandoned” fishing gear as the result of force majeure.</p> <p>Note that the FADMO IWG is actively working on the marking, tracking and monitoring of FADs.</p>		

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<p style="color: green;">control of a vessel to undertake fishing activities, is not considered abandoned or discarded, at the time of release or while being used.</p> <p style="color: green;">iii. Fishing gear such as FADs, traps, static nets, released from the control of a vessel to undertake fishing activities that is not in use and is not recovered is considered abandoned.]</p> <p style="color: green;">5. alt [Japan: CCMs shall prohibit their fishing vessels operating within the WCPFC Convention Area from abandoning or discarding any fishing gear into the water, except as would be permitted under applicable international instruments.]</p> <p>Chair: Explore options to reference FADs and/or the work of the FADMO-IWG.</p>	<p>We support maintaining the original language (5.alt) if the definitions are clearly outlined above and there is a commitment to consider how the work of the FADMO-IWG could be included in this measure and further considered in future reviews.</p>	<p>crew members and lead to violations.</p> <p>Furthermore, during fishing operations, gear such as Fish Aggregating Devices (FADs), traps, and set nets, when deployed or in use, are not considered abandoned or discarded. It is China's position that this principle should extend to longline fishing gear, including main lines, branch lines (nylon monofilament), hooks, and ropes. These are indispensable components of fishing vessels' equipment and are not deliberately discarded. Any loss typically results from operational mishaps, representing an economic detriment to the fishing vessel rather than intentional discarding. Moreover, main lines, branch lines (nylon monofilament), hooks, and ropes of the longline cannot create so called ghost fishing.</p>					

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<p>Consider ALDFG prohibition. Exemptions outlined in MARPOL Annex V include:</p> <ol style="list-style-type: none"> <li>1. the discharge of garbage from a ship necessary for the purpose of securing the safety of a ship and those on board or saving life at sea; or</li> <li>2. the accidental loss of garbage resulting from damage to a ship or its equipment, providing that all reasonable precautions have been taken before and after the occurrence of the damage, to prevent or minimize the accidental loss; or</li> <li>3. the accidental loss of fishing gear from a ship provided that all reasonable precautions have been taken to prevent such loss; or</li> <li>4. the discharge of fishing gear from a ship for the protection of the marine environment or</li> </ol>							

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for the safety of that ship or its crew.							
6. CCMs shall prohibit their fishing vessels from discharging any <del>e-waste, garbage, plastics, (including plastic packaging, items containing plastic and polystyrene) but not including fishing gear.</del> except as would be permitted under applicable international instruments.  Chair: Requesting WCPFC legal support to address IPNLF’s comment.	In response to IPNLF, our understanding is that it would be permitted in cases of force majeure or to secure the safety of crew, for example.					Subject to some clarification about the implication of “would be permitted under applicable international instruments”, the PNAO Office supports some extension of the prohibition on discharging non-biodegradable materials. However, we are concerned at the impact of increasing garbage going to landfill on some small islands, if discharging bio-degradable materials and open burning are banned.	IPNLF: We would like to clarify what e-waste, plastics or garbage discharge is permitted under international instruments, as our understanding of MARPOL is that these actions are prohibited.
<del>[FFA: 6.bis CCMs [NZ: , other than SIDS,] shall [NZ: take all necessary measures] [NZ: meet their obligations] to prevent, reduce and control marine pollution [NZ: from] [NZ: of the marine environment] anthropogenic GHG emissions from their fishing operations within the Convention Area.]</del>	Canada supports efforts to take further action to reduce GHG emissions.  We note that the IMO Net Zero Framework, which will establish a global standard for GHG emissions for international shipping once it comes into force in 2027, only applies to vessels 5,000GT and above – which would essentially exclude	Please list the international legal bases for excluding SIDS, the current levels of GHG emissions, and the methods to prevent, reduce, and control them.	Requests the inclusion of a new paragraph in response to the 2024 ITLOS Advisory Opinion on Climate Change regarding marine pollution:  “the Tribunal found that anthropogenic GHG emissions constitute “pollution of the marine environment” under the Law of the sea convention (para 173).		<i>NZ proposed edits.</i>		

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	<p>most fishing vessels. The Framework does leave open the possibility to revisit the minimum vessel size threshold going forward.</p>		<p>Therefore, States Parties to the Law of the Sea Convention ‘have the specific obligations to take all necessary measures to prevent, reduce and control marine pollution from anthropogenic GHG emissions and to endeavour to harmonize their policies’ (para 243).</p> <p>Additionally, ‘States Parties have the specific obligation to take all measures necessary to ensure that anthropogenic GHG emissions under their jurisdiction or control do not cause damage to other States and their environment, and that pollution from such emissions under their jurisdiction or control does not spread beyond the areas where they exercise sovereign rights’ (para 258)”</p> <p>Suggested new paragraph: “6bis. CCMs, other than</p>				

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Text <i>[Proponent: (source) amendment]</i>	Canada	China	FFA	Japan	New Zealand	PNAO	Observers
			<p>SIDS, shall take all necessary measures to prevent, reduce and control marine pollution from anthropogenic GHG emissions from their fishing operations within the Convention Area”</p> <p>*SIDS can be exempted (blue text) from this provision if needed, considering the low contribution to the global climate crisis.</p>				
<p>7. [Japan: Fishing gear, e-waste, garbage, and plastics released due to the following circumstances whereby every effort is made for retrieval, but retrieval is impossible, are considered lost: i. For the purposes of securing the safety of a vessel and those on board; ii. In an effort to save a life; or iii. Due to environmental factors (severe weather, strong tides or currents, underwater snag).]</p>	<p>Canada supports moving all definitions to definition section.</p>	<p>We agree with Japan intervention. The directive to "make every effort to recover" items is not sufficiently precise, as it lacks concrete and measurable benchmarks. This imprecision may give rise to disparate interpretations and practices among various crew members or maritime operators, thereby complicating the objective assessment of whether an item qualifies as "lost." For instance,</p>	<p>Please align with the definition of Lost Fishing Gear in Paragraph 1, and in such case the definition includes these circumstances, then this paragraph 7 can only refer to e-waste, garbage and plastics, and can be merged with paragraph 6.</p>	<p>Japan would like to propose to delete this paragraph with same reason as mentioned in paragraph 5.</p>	<p>See above suggestion about definition of abandoned/discarded/lost fishing gear. SPRFMO defines “abandoned” fishing gear as a result of force majeure – which would be consistent with the intent of para 7.</p>		

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Text <i>[Proponent: (source) amendment]</i>	Canada	China	FFA	Japan	New Zealand	PNAO	Observers
<p>8. (NEW) CCMs shall prohibit their [Japan: fishing] vessels from the open burning of fishing gear, e-waste, garbage, and plastics. CCMs are encouraged to prohibit their fishing vessels operating within the WCPFC Convention Area from discharging:</p> <p>a) oil or fuel products or oily residues into the sea;</p> <p>b) garbage, including fishing gear<sup>1</sup>, food waste, domestic waste, incinerator ashes and cooking oil; and</p> <p>c) sewage, except as would be permitted under applicable international instruments.</p> <p>[PNAO: <sup>1</sup> Fishing gear, for the purposes of this measure, that are released into the water with the intention of later retrieval such as FADs, traps and static nets, are not considered garbage. FADs released into the water with the intention and capacity</p>	<p>Canada supports the FFA’s statement. If open burning of biodegradable waste is not considered harmful to the environment and can be done safely, this seems like a practical approach to minimizing waste being offloaded in ports. That said, it would be difficult to monitor and enforce this. For example, how would we be able to tell whether biodegradable versus non-biodegradable items were being burned?</p> <p>Domestically, Canada only allows shipboard incineration of waste, with clear exceptions (see paras 113-115 of <a href="#">Vessel Pollution and Dangerous Chemicals Regulations</a>).</p> <p>We could reframe to only allow incineration of materials in accordance with MARPOL obligations. This approach might address concerns shared on the</p>	<p>there may be differing views on whether a single recovery attempt under adverse weather conditions constitutes sufficient effort, or whether multiple attempts are required.</p> <p>Furthermore, with respect to the stipulation that "fishing gear, electronic waste, garbage, and plastics, which remain unrecoverable despite exhaustive efforts, shall be classified as lost," we kindly request clarification on the specific meaning of "garbage" in this context.</p> <p>Additionally, the requirement to "diligently document the storage positions and categorization of the aforementioned items within the vessel’s stowage plan" is not applicable to fishing vessels. Due to the fact that garbage storage locations on such vessels are not</p>	<p>Suggest exploring of environmental risks and practicabilities of considering biodegradable waste to be banned from burning, as it reduces the volume of waste brought into SIDS’ ports and whether burning of biodegradable waste does not constitute major pollution, compared with challenges of waste management at land.</p>	<p>Add fishing in front of vessels.</p>	<p>What does “open burning” mean in this paragraph? Does “open burning” refer only to burning without emission control? Does this mean that burning with emission control is permitted?</p>	<p>On FADs, the PNA Office notes that the issues related to marine pollution from FADs are being addressed in the FAD Management Options Working Group. It is proposed, therefore, that footnote 1 in the current CMM should be maintained and extended along the following lines:</p> <p><i>“FADs released into the water with the intention and capacity of later retrieval, are not considered a marine pollutant, or abandoned, lost, or discarded.”</i></p> <p>We appreciate the reframing of the previous PNAO proposal above but note that the highlighted text is current text from footnote 1 of CMM 2017-04 and perhaps it should be in black.</p>	

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<p>of later retrieval, are not considered a marine pollutant, or abandoned, lost, or discarded.]</p> <p>Chair: Consider how best to reference and/or implement the work of the FADMO-IWG in the measure.</p>	<p>definition/ambiguity of open burning.</p> <p>We agree with the agree with PNA office on maintaining language on FADs and would suggest including it within the definition section.</p>	<p>fixed; they vary and may change depending on the fluctuating capacity of the cargo hold.</p>					
<p>8.bis [PNAO: (WCPFC) To reduce the amount of synthetic marine debris, CCMs shall encourage vessels flying their flag to use, or transition towards using, non-plastic and biodegradable materials in the construction of fishing gear.]</p>	<p>The inclusion of FADs could be considered in this provision.</p>	<p>Disagree. While purse seine fisheries have made some progress in degradable technologies, longline fishing gear still relies on traditional materials like nylon and monofilament, with no mature alternatives available. Premature implementation of such requirements without proven substitute materials would impose technical challenges on longline fisheries.</p>				<p><i>The PNAO withdraws these proposals for now and supports the Chair's proposal to take into account the work of the FADMO-IWG.</i></p>	
<p>8. ter [PNAO: (WCPFC) No later than [20XX], the Commission shall take a decision on the implementation of biodegradable fishing gear requirements.]</p>	<p>We note there has been recent developments in this area (<a href="#">Can biodegradable materials reduce plastic pollution without decreasing catch efficiency in longline fishery?</a>; <a href="#">Biodegradable fishing</a></p>	<p>Considering the difficulties associated with longline fisheries, it is recommended to exclude longlining. Purse seines as the primary fishing gear should also be excluded.</p>					

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Text <i>[Proponent: (source) amendment]</i>	Canada	China	FFA	Japan	New Zealand	PNAO	Observers
	<p><a href="#">gears: A potential solution to ghost fishing and marine plastic pollution - ScienceDirect</a>).</p> <p>Could this maybe be considered in future work/ review once more information is available?</p>						
<b>Retrieval</b>							
8. quater [ANCORS: CCMs shall encourage their fishing vessels operating in the WCPFC Convention Area to assess and, where feasible, mitigate sources of underwater noise generated by vessel operations, particularly through the adoption of quiet vessel technologies (e.g., quieter propellers, hull coatings, machinery insulation) and operational practices (e.g., speed reductions and route adjustments in sensitive areas).]		We disagree for reasons previously stated. If research is to proceed, it must follow this sequence: purse seine, trolling, shallow-set longline, and deep-set longline. However, China would find it difficult to agree to supporting this research from the Commission's budget at this stage.					ANCORS: Addition of 8bis. related to underwater noise mitigation (insert after Paragraph 8)
9. CCMs shall [IPNLF: require] [IPNLF: encourage] their fishing vessels within the	Canada prefers this provision remain an encouragement as some vessels are small and			Since Japan proposes to delete paragraph 7, "lost" should be deleted here.		If the reference to port reception facilities is retained, there needs to be a reference to	IPNLF: We find the use of the word 'encourage' to be too weak to result in significant change on

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Text <i>[Proponent: (source) amendment]</i>	Canada	China	FFA	Japan	New Zealand	PNAO	Observers
<p>WCPFC Convention Area to retrieve abandoned, <b>[Japan: lost]</b> or discarded fishing gear. <b>and retain the material on board, separate from other waste for discharge to port reception facilities. Where retrieval is not possible or does not occur, CCMs shall encourage their fishing vessels to report the latitude, longitude, type, size and age of abandoned, lost or discarded fishing gear.</b></p> <p>Chair: Consider proposed changes.</p>	<p>encounter a significant amount of ALDFG during their trips, or in some instances, vessels are not able to retrieve safely.</p> <p>Should ALDFG be retrieved, our preference is to ensure reporting is made a requirement to contribute to research.</p> <p>Canada would also like to maintain the word lost. When ghost gear is encountered, there is no way to differentiate between abandoned, lost and discarded. While in that moment, it is technically found by a vessel, it may still be considered lost gear from another vessel.</p>					<p>carriers in relation to vessels that offload to carriers.</p>	<p>the water and would therefore like to suggest changing this word to 'require'. We wonder if you would consider a clause to require coordination with national authorities and compensation for pollution in national waters? This would be particularly relevant in cases of repeat pollution and for fishing gears like FADs which heavily pollute coastlines and create a real financial burden for coastal states.</p>
<p><b>Storage, Retention and Disposal</b></p> <p>Chair: Explore at-sea monitoring and transshipment considerations.</p>						<p>Monitoring imbalance: The particular concern of the PNA is to address the imbalance in the monitoring of the current CMM in which there is 100% observer coverage on purse seine vessels for monitoring plastic waste discharges by purse seine vessels,</p>	

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Text <i>[Proponent: (source) amendment]</i>	Canada	China	FFA	Japan	New Zealand	PNAO	Observers
						<p>and a very low level of monitoring plastic waste discharges by longline vessels. This imbalance deeply undermines the effectiveness of the current measure, and it will need to be addressed if the measure is to be effective and before the scope of the measure can be extended.</p> <p>The monitoring imbalance is particularly important on this issue because:</p> <p>a) FFA analysis has estimated that plastic waste strapping and lining from longline bait boxes is the major source of plastic waste from fishing vessels in the WCPO; and</p> <p>b) a large share of the longline catch is transhipped at sea, creating increased incentive to dump waste.</p>	

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						<p>Involving observers on carriers to monitor the disposal of this plastic waste from longliners transshipping at sea could partially make up for the lack of observers on longliners, and reduce the current imbalance in the monitoring of this CMM.</p> <p>Transshipment: The PNA Office is concerned that the management of waste on trips where catches are transhipped is overlooked. Most trips covered by this CMM result in catch transshipment to another vessel and not unloading at a dock. For marine pollution mitigation, this pattern of unloading is both: a) a challenge because it complicates the unloading of waste; and b) an opportunity because waste movement can be monitored by observers on carriers.</p>	

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						In addition, focusing on the adequacy of port facilities without addressing the adequacy of arrangements for waste management where catches are transhipped at sea will increase the incentive to tranship at sea.	
<p>10. CCMs shall ensure their vessels within the WCPFC Convention Area safely store and retain all unusable and retrieved fishing gear separately from e-waste, garbage, and plastics and have this information detailed in a vessel stowage plan. <del>the material on board, separate from other waste for discharge to port reception facilities. Where retrieval is not possible or does not occur, CCMs shall encourage their fishing vessels to report the latitude, longitude, type, size and age of abandoned, lost or discarded fishing gear.</del></p>	<p>Our vision for the stowage plan was to identify locations on the vessel earmarked for retrieved ALDFG vs useable fishing gear vs other waste. This could be done by simply indicating specified areas on a vessel map onboard the vessel. The intent is to ensure vessels are in compliance with the measure. For example, not fishing with other gear types, and not discarding pollutants while at sea.</p> <p>We would welcome views on what may be a practical way forward.</p> <p>Proposed textual edit to Japan's alt text</p>	<p>Agree with Japan's intervention. According to MARPOL Annex V, vessels already have a Garbage Record Book. Recording should be done directly in the Garbage Record Book rather than in the vessel stowage plan. Since the location of garbage placement on fishing vessels is not fixed for each voyage, recording the location directly in the Garbage Record Book is more practical.</p>	<p>Para 10 requires information about storage to be detailed in a vessel stowage plan. It is unclear what information is required in this stowage plan. It would be useful to get clarification from the proponent on what a stowage plan would entail. For clarity, it may be useful to outline this in a template. Would also be helpful to get a proposal on its relationship to the reporting requirements under current Paragraphs 11 and 18.</p> <p>Also please refer to the comment on the scope of the measure above.</p>	<p>Japan supports original para 5 of the CMM 2017-04. MARPOL Annex V does not request this. If this separation request retains, it should be "shall encourage" as CMM2017-04.</p>	<p>Need clarity on what would be contained in the "vessel stowage plan"? What would it cover? Would it only cover management of waste or would it cover other stowage matters? This paragraph suggests it would include details on the separation of waste?</p> <p>For clarity, it would be useful to outline how this would be implemented – perhaps a template for the "vessel stowage plan"?</p>		

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Text <i>[Proponent: (source) amendment]</i>	Canada	China	FFA	Japan	New Zealand	PNAO	Observers
<p>10. alt [Japan: CCMs shall encourage their fishing vessels within the WCPFC Convention Area to retrieve [CA: and safely store] abandoned, lost or discarded fishing gear and retain the material on board, separate from other waste for discharge to port reception facilities. Where retrieval is not possible or does not occur, CCMs shall encourage their fishing vessels to report the latitude, longitude, type, size and age of abandoned, lost or discarded fishing gear.]</p> <p>Chair: Explore what may constitute a stowage plan in relation to proposed reporting requirements.</p>	<p>...retrieve [and safely store] abandoned...</p>						
<p>11. (NEW) CCMs shall ensure their [Japan: fishing] vessels [Japan: <sup>2</sup>][FFA: greater than 100 GT] carry and maintain a record of fishing gear, e-waste, garbage, and plastics that is onboard [CA:</p>	<p>Canada supports alignment with MARPOL Annex V, Regulation 10, including provisions for vessels 100GT and above, as well as 400GT and above.</p>	<p>China has already acceded to MARPOL Annex V and enacted corresponding domestic regulations. However, enterprises have generally reported difficulties in implementing the</p>	<p>MARPOL Annex V mandates a Garbage Record Book, providing a comprehensive log of all garbage handling activities on a vessel, for vessels greater than 100 GT, or vessels carrying more than 15</p>	<p>Add fishing in front of vessels.  Japan proposes to add a footnote to clarify the application of this paragraph taking into account the MARPOL Annex V.</p>	<p>This requirement to maintain a record of all fishing gear, ewaste, garbage, and plastics that is onboard the fishing vessel when they leave port goes beyond what is already required under</p>	<p>Any requirements in relation to ports should as far as possible apply to vessels such as carriers.</p>	

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Text <i>[Proponent: (source) amendment]</i>	Canada	China	FFA	Japan	New Zealand	PNAO	Observers
<p>and transshipped by] the vessel when they leave port [PNAO: or is transferred onboard from another vessel at sea] and how/when these are discarded. Vessels flagged to CCMs who are signatories to MARPOL Annex V can use the Garbage Record Book to satisfy this requirement.</p> <p>[Japan: <sup>2</sup> This paragraph applies to fishing vessels of 400 gross tonnage and above and every ship which is certified to carry 15 or more persons engaged in voyage to ports under the jurisdiction of another CCM.]</p> <p>Chair: Consider alignment with MARPOL requirements, and WCPFC reporting requirements and monitoring programs. Consider practical record-keeping options. Explore options to</p>	<p>We agree with the FFA’s suggestion on the need to make reference to activities related to carrier vessels involved in transshipment from longline vessels, to enhance monitoring of plastic waste from longline bait boxes that do not unload in port.</p> <p>Could this be addressed by adding: “... is onboard [and transshipped by] the vessel...” ?</p>	<p>requirement to record "the quantity of fishing gear, electronic waste, garbage, and plastics carried onboard upon departure, as well as their discharge methods and timing," as the diversity and complexity of items onboard make accurate accounting impractical and lacking in operability.</p> <p>China respectfully submits that the requirement for vessels to "accurately record the types and quantities of fishing gear, electronic waste, garbage, and plastic items carried upon departure, and to document the disposal methods and timelines throughout the voyage" is operationally cumbersome and impractical. In actual practice, the large volume and diverse range of items on board would demand frequent and detailed logging by crew members. This</p>	<p>persons engaged in international voyages, and fixed/floating platforms.</p> <p>Since the draft measure applies to all fishing vessels operating within the Convention Area, this requirement will also apply to small and domestic vessels. This could be unnecessarily burdensome for smaller vessels that may not generate or carry such garbage. Therefore, it may be useful to include a qualifier for this requirement eg. limit to vessels over a certain size etc.</p> <p>Also, it would be useful to get clarifications on the practicability of recording e-waste and garbage at the moment the vessel leaves port. If the vessel generates the waste and garbage during the trip, it seems not practical to make a reporting requirement before this is generated.</p>		<p>MARPOL and will require further consideration. Need clarity as to which vessels this would apply to, and how it would be implemented and monitored.</p> <p>Consider how to align this provision with MARPOL requirements and WCPFC reporting requirements and monitoring programmes. Clarify which vessels this would apply to for example should there be a focus on monitoring of longline vessels via transshipment activities?</p>		

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<p>increase monitoring of longline vessels via transshipment activities.</p> <p>MARPOL Annex V, Regulation 10 states: “2 Every ship of 100 gross tonnage and above, and every ship which is certified to carry 15 or more persons, and fixed or floating platforms shall carry a garbage management plan which the crew shall follow. This plan shall provide written procedures for minimizing, collecting, storing, processing and disposing of garbage, including the use of the equipment on board. It shall also designate the person or persons in charge of carrying out the plan. Such a plan shall be based on the guidelines developed by the Organization† and written in the working language of the crew.</p>		<p>process is prone to errors or omissions due to oversight or memory lapses, which could undermine the reliability of subsequent regulatory oversight and traceability efforts.</p> <p>Furthermore, the imposition of such additional record-keeping duties is likely to encounter resistance from crew members, as it significantly increases their workload. This may lead to a lack of diligence in performing these responsibilities, thereby reducing the accuracy and completeness of the records. As a result, the effectiveness of the proposed record-keeping system could be substantially compromised.</p> <p>With specific regard to the requirement to "accurately record the types and quantities of fishing gear, electronic</p>	<p>Suggests inclusion of a provision mandating vessels to provide the information in paragraph 11 to the authorities of their flag states within a reasonable time frame (eg. 28 days), and for the flag state to provide an annual summary of this information in their Part 2 report. To avoid duplication of efforts, these requirements should not apply to trips on which an ROP observer is carried or an electronic monitoring programme meeting the commission standards is implemented.</p> <p>Suggestion to also make reference to activities related to carrier vessels involved in transshipment from longline vessels, to enhance monitoring of plastic waste from longline bait boxes that do not unload in port.</p>				

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<p>3 Every ship of 400 gross tonnage and above and every ship which is certified to carry 15 or more persons engaged in voyages to ports or offshore terminals under the jurisdiction of another Party to the Convention and every fixed or floating platform shall be provided with a Garbage Record Book. The Garbage Record Book, whether as a part of the ship's official logbook or as an electronic record book which shall be approved by the Administration taking into account the Guidelines<sup>‡</sup> developed by the Organization, or otherwise, shall be in the form specified in the appendix II to this Annex. 1 Each discharge into the sea or to a reception facility, or a completed incineration, shall be promptly recorded in the Garbage Record Book and signed for on</p>		<p>waste, garbage, and plastic items carried upon departure":</p> <p>Clarification on "fishing gear": Does this term refer solely to unusable or recovered fishing gear?</p> <p>Clarification on "plastic items": Does this pertain exclusively to plastic waste? If it encompasses usable plastic items, their variety is too extensive to be feasibly documented. We respectfully suggest that a detailed distinction be provided to specify which plastic items qualify as plastic waste. It should be noted that many plastic items are essential for the vessel's operations, and their loss would constitute an economic disadvantage rather than an intentional act of disposal as waste.</p> <p>Regarding para 13, we suggest that based on Japan's intervention,</p>					

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<p>the date of the discharge or incineration by the officer in charge. Each completed page or group of electronic entries of the Garbage Record Book shall be signed by the master of the ship. The entries in the Garbage Record Book shall be at least in English, French or Spanish. Where the entries are also made in an official language of the State whose flag the ship is entitled to fly, the entries in that language shall prevail in case of a dispute or discrepancy.</p> <p>.2 The entry for each discharge or incineration shall include date and time, position of the ship, category of the garbage and the estimated amount discharged or incinerated.</p> <p>.3 The Garbage Record Book shall be kept on board the ship or the fixed or floating platform, and in such a place as to be readily</p>		'ensure' be changed to 'request'.					

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<p>available for inspection at all reasonable times. This document shall be preserved for a period of at least two years from the date of the last entry made in it.</p> <p>.4 In the event of any discharge or accidental loss referred to in regulation 7 of this Annex an entry shall be made in the Garbage Record Book, or in the case of any ship of less than 400 gross tonnage, an entry shall be made in the ship’s official logbook, of the location, circumstances of, and the reasons for the discharge or loss, details of the items discharged or loss, and the reasons for the discharge or loss, details of the items discharged or lost, and the reasonable precautions taken to prevent or minimize such discharge or accidental loss.”</p>							
<p>12. CCMs are requested to ensure adequate port reception facilities are</p>							

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Text <i>[Proponent: (source) amendment]</i>	Canada	China	FFA	Japan	New Zealand	PNAO	Observers
<p>provided to receive <b>waste</b> fishing gear, e-waste, garbage, and <b>plastics</b> from fishing vessels. <b>SIDS CCMs</b> are requested to utilise, as appropriate, regional port reception facilities in accordance with international standards.</p>							
<p>13. CCMs are encouraged to ensure that shall encourage their [CN: are encouraged to request that] fishing vessels flying their flag and operating within the WCPFC Convention Area to inform their flag State of ports in countries that are Party to the annexes of MARPOL which that do not have adequate port reception facilities [CA: in accordance with international guidelines] for MARPOL wastes.</p> <p>[13. alt Japan: CCMs are encouraged to ensure that fishing vessels flying their flag and operating within the WCPFC</p>	<p>We agree with the FFA in that the term adequate is subjective.</p> <p>Domestically, Canada evaluates the adequacy of port reception facilities in accordance with the IMO guidelines outlined in MEPC.83(44): Guidelines for Ensuring the Adequacy of Port Waste Reception Facilities. We propose adding the following text to better define adequate: “in accordance with international guidelines”.</p> <p>With regards to Japan’s comment on the reporting redundancy, we understand that the GSIS information may</p>		<p>Para 13 here is para 7 of CMM 2017-04. The latter encourages fishing vessels “to inform their flag State of ports in countries that are Party to the annexes of MARPOL which do not have adequate port reception facilities for MARPOL wastes”. The amendment to para 13 now requires flag vessels to inform flag State of ports that do have adequate port reception facilities.</p> <p>The use of the term “adequate” in para 13-15 is subjective, but noting this is in the current measure too. Para 14 qualified this by stating it should be “in accordance with</p>	<p>Japan propose to retain original paragraph 7 of CMM 2017-04. The purpose of this paragraph is that fishing vessels are encouraged to inform their flag state of ports if the ports do not have adequate facilities to receive wastes even though the port state is a member of MARPOL. The information to be collected by Canada's proposal is covered by the existing system, namely Global Integrated Shipping Information System.</p>			

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Text <i>[Proponent: (source) amendment]</i>	Canada	China	FFA	Japan	New Zealand	PNAO	Observers
<p>Convention Area inform their flag State of ports in countries that are Party to the annexes of MARPOL which do not have adequate port reception facilities for MARPOL wastes.]</p> <p>Chair: The following may be useful references: <a href="#">Reception facilities</a>; <a href="#">MEPC.1-Circ.834-Rev.1.pdf</a>. Canada proposed to target the encouragement in identifying ports in countries that do have adequate port reception facilities so that vessels can plan accordingly.</p>	<p>not be available to all CCMs. Our intent was to solicit a list of ports that would be adequate according to international standards and that all WCPFC registered vessels can have access to that list to responsibly plan fishing trips. Also, we expect that vessels/ CCMs are not likely to report which ports do not have adequate port reception facilities so thought this approach would yield a better outcome.</p> <p>We could also consider adding an obligation for the Executive Director to add the list of ports to the website to support CCMs and their fishing vessels.</p>		<p>international standards”.</p> <p>Para 14 is binding and as currently drafted, appears to be applicable to all CCMs. It may be worth adding a qualifier to para 14 to limit this reporting requirement to those CCMs that have ‘adequate port reception facilities’. A possible suggestion is provided.</p>				
<p>14. <del>Japan: (NEW) CCMs [FFA: with adequate port reception facilities] shall provide a list of its ports with adequate reception facilities, in accordance with international standards, to the WCPFC Secretariat for</del></p>	<p>See above comment re: GSIS.</p>	<p>At present, many Pacific island nations face significant challenges due to the absence or insufficiency of port waste disposal facilities. It is recommended that priority be given to</p>		<p>Japan proposes to delete this paragraph since CCMs can collect the information from the Global Integrated Shipping Information System.</p>		<p>Adequacy of Port Facilities: The PNA Office is concerned about the implications of the proposed new paras 14 and 15 for use of SIDS ports. There would need to be a substantial commitment of resources for port</p>	

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its dissemination to all CCMs.]		enhancing shore-based waste management capabilities in these nations before further enforcing pollution prevention measures on vessels.				improvements before this approach could be agreed.	
<p>15. <span style="color: red;">[PNAO proposed for deletion]</span> <span style="color: green;">(NEW)</span> CCMs shall encourage their vessels to utilize, as appropriate, the ports identified as having adequate port reception facilities.</p> <p>Chair: Consider language that would better address at sea monitoring.</p>		<p>In the practical context of maritime operations, vessels may encounter difficulties such as poor communication signals, which could impede their ability to report relevant information to national authorities within the stipulated 72-hour timeframe.</p> <p>Additionally, fishing gear that lacks positioning systems cannot be accurately tracked for loss or abandonment. Consequently, crew members are unable to provide precise reports on the quantity of lost fishing gear.</p> <p>In light of these considerations, it is suggested that the implementation of pollution prevention</p>				<p>The PNA Office does not support additional provisions relating to ports without provisions relating to transshipment.</p>	

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Text <i>[Proponent: (source) amendment]</i>	Canada	China	FFA	Japan	New Zealand	PNAO	Observers
		measures take into account the current operational constraints faced by fishing vessels in the region.					
16. CCMs shall cooperate, consistent with national laws and regulations, directly or through the Commission, and in accordance with their capabilities, to actively support SIDS and Territories through the provision of adequate port facilities for receiving and appropriately disposing of <b>waste</b> fishing gear, <b>e-waste, garbage, and plastics</b> from fishing vessels.							
<b>Reporting Requirements</b>							
17. (SPRFMO) CCMs shall <b>[Japan: encourage their fishing vessels to notify their competent authority within 72 hours of the following information when the]</b> <b>[Japan: ensure that when their]</b> vessels cannot retrieve abandoned, <b>[Japan:</b>	Canada prefers to make ALDFG reporting an obligation. From a practical standpoint, we believe most reporting could be done as part of the annual report. Should the ALDFG be considered to pose a significant risk of ghost fishing or to	We support the Chair's view and disagree with the '72-hour' timeframe, which has no value.  At present, many Pacific island nations face significant challenges due to the absence or insufficiency of port	FFA (paras 17-20): Please align these reporting requirements with definitions for ALDFG in paragraph 1, and scope, and clearly define which exact fishing gear these reporting requirements will apply to.	Japan proposes the amendments. MARPOL does not have this requirement. Japan can consider it if this is not compulsory.	Note that these provisions (17-19) copied from SPRFMO only apply to the high seas. If adopted, it would impose significant new obligations for CCMs in WCPFC. These proposals should first and foremost be	The PNA Office supports, in principle, enhanced recording and reporting of waste management, including waste discharge and fishing gear-related incidents. The preferred form of any enhanced recording and reporting would depend on the	

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Text <i>[Proponent: (source) amendment]</i>	Canada	China	FFA	Japan	New Zealand	PNAO	Observers
<p>lost] or discarded fishing gear (ALDFG) linked to that vessel [Japan: the vessel notifies its competent authority within 72 hours of the following information]:</p> <p>a. the vessel name; b. the type/material of the gear lost; c. the quantity of the gear lost; d. the date (DD-MM-YYYY) that the gear was abandoned, [Japan: lost,] or discarded; e. the position (longitude/latitude) where the gear was abandoned, [Japan: lost,] discarded; f. measures taken by the vessel to retrieve the ALDFG; and, g. the circumstances, if known, that led to the gear being abandoned, [Japan: lost,] or discarded.</p> <p>Chair: Consider reporting timeframe and the value of making this provision compulsory.</p>	<p>navigational safety, we are of the view that every effort should be made to retrieve the ALDFG and reporting timelines should reflect that. However, this approach would be open to interpretation as ‘significant risk’ has not been defined. We would welcome views from others, understanding WCPFC and SPRFMO contexts are very different.</p> <p>To respond to PNAO comments, the purpose of this reporting, in our view, is to increase our understanding of ALDFG and reduce the stigma around ALDFG.</p> <p>Domestically, Canada requires its vessels to provide the following information within 24 hours of returning to port: - Individual information: Region of licence issuance (DFO regions- Arctic, Gulf, etc.), Date of report, First and last name of</p>	<p>waste disposal facilities. It is recommended that priority be given to enhancing shore-based waste management capabilities in these nations before further enforcing pollution prevention measures on vessels.</p> <p>In the practical context of maritime operations, vessels may encounter difficulties such as poor communication signals, which could impede their ability to report relevant information to national authorities within the stipulated 72-hour timeframe.</p> <p>Additionally, fishing gear that lacks positioning systems cannot be accurately tracked for loss or abandonment. Consequently, crew members are unable to provide precise reports on the quantity of lost fishing gear.</p>	<p>For practicability reasons, reporting by logsheet would be the main alternative.</p> <p>Appreciate an early circulation of draft Audit Points to discuss also how compliance is going to be assessed.</p> <p>Paragraph 17 requires vessels to report certain information to their competent authority within 72hrs when they cannot retrieve ALDFG linked to their vessel. Please refer to the comment made for paragraph 11, on timeframe for submission:</p> <p>Suggests inclusion of a provision mandating vessels to provide the information to the authorities of their flag states within a reasonable time frame (eg. 28 days), and for the flag state to provide an annual summary of this information in their Part 2 report. To avoid duplication of efforts,</p>		<p>focused on vessels fishing on the high seas/outside of their flag’s national jurisdiction.</p> <p>These proposals should first and foremost be focused on vessels fishing on the high seas/outside of their flag’s national jurisdiction.</p> <p>At present, the proposal would go beyond MARPOL requirements and would require consultation with industry and consideration as to the means to implement domestically.</p> <p>New Zealand supports JPN’s proposed wording.</p>	<p>purpose and volume of that reporting. A more precise definition of what is to be reported, as referred to above would be helpful for that purpose.</p>	

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Text <i>[Proponent: (source) amendment]</i>	Canada	China	FFA	Japan	New Zealand	PNAO	Observers
	fishing vessel operator, Fisher Identification Number, Licence number, VRN, Email - Where gear was lost: last date the gear was known to be at this location, last known position of lost gear, target species, Fishery Management Area - Describe lost gear: Gear type, Number of units lost, description of gear lost, estimated length of rope lost (in feet) - Optional: reason for loss	In light of these considerations, it is suggested that the implementation of pollution prevention measures take into account the current operational constraints faced by fishing vessels in the region.	these requirements should not apply to trips on which an ROP observer is carried or an electronic monitoring programme meeting the commission standards is implemented.				
18. (SPRFMO) CCMs shall encourage [Japan: their fishing] vessels to report the following information to its competent authority regarding any retrieved ALDFG: a. the vessel name; b. the name and call sign of the vessel that abandoned or lost the gear (if known); c. the type of gear retrieved; d. the quantity of gear retrieved;	We welcome China’s comment and propose the following for consideration:  1. Timely Transfer of Information: While we support the inclusion of a defined timeline to facilitate data collection, our intent with this provision was to make it as easy as possible to share information on retrieved ALDFG. We would welcome	Regarding paragraphs 17-18, we support Japan's view. MARPOL Annex V does not mandate reporting of all ALDFG incidents, and its focus is on incidents that pose a 'significant threat' to the marine environment or navigation. MARPOL Annex V aims to prevent pollution from ships, and its reporting requirements for lost fishing gear are based on assessing 'significant	Paragraph 18 is non-binding and requires vessels to report to their authority certain information of any retrieved ALDFG. It would be useful to get clarification from the proponent on the volume of reporting, and get advice from the SSP.	Add ‘their fishing’ in front of vessels.			

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Text <i>[Proponent: (source) amendment]</i>	Canada	China	FFA	Japan	New Zealand	PNAO	Observers
<p>e. the date (DD-MM-YYYY) that when the gear was retrieved; f. the position (longitude/latitude) where the gear was retrieved; and, g. if possible, photographs of the gear retrieved.</p> <p>Chair: Requesting advice from the WCPFC Secretariat and SSP on the volume of reporting that may be associated with this provision.</p>	<p>suggestions on a timeline.</p> <p>2. Distribution Standards: We agree and suggest this be included as part of the Annual Report part 2, perhaps? This language was taken from SPRFMO and not tailored to WCPFC's framework. We welcome views from CCMs and TCC.</p> <p>3. Fishing gear permitted to be discharged, in accordance with WCPFC CMMs: We agree we should reference this element via the following "...unless gear permitted to be discharged, in accordance with WCPFC obligations", though would prefer we still include this as part of the Annual Report as this is likely a relatively significant contributor to ALDFG. These obligations are not meant to be punitive in nature, rather a means</p>	<p>threats' that may be posed to the marine environment or navigational safety. This means that not all minor fishing gear loss incidents require mandatory reporting, which is more aligned with the practical realities of fishing operations and avoids unnecessary administrative burdens. Therefore, when incorporating MARPOL's reporting obligation into WCPFC, the focus should be on ALDFG incidents with potentially significant environmental impacts, rather than comprehensive mandatory reporting of all types of fishing gear loss. Regarding paragraphs 19-20, we agree with the Chair's view.</p> <p>With respect to paras 18-20, China respectfully submits the following observations:</p>					

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Text <i>[Proponent: (source) amendment]</i>	Canada	China	FFA	Japan	New Zealand	PNAO	Observers
	to collect the information we can to better understand our overall impact on the oceans we rely on.	1. Timely Transfer of Information: The requirement to "promptly transfer information" lacks a clearly defined time limit, which may lead to ambiguity in its implementation.  2. Distribution Standards: The phrase "distribute as appropriate" could result in unclear standards for distribution, potentially causing confusion and inconsistency in practice.  Additionally, regarding the abandonment and loss of auxiliary fishing gear, it is challenging to accurately quantify such occurrences. For instance, in situations where hooks and lines are bitten by sharks, they are often cut off to prevent the shark from boarding the vessel. This practice is intended to release the shark, in compliance with established shark					
19. (SPRFMO) CCMs shall promptly transmit the information received pursuant to paragraphs 17 to the Secretariat for its dissemination to all CCMs, as appropriate, so that every attempt can be made to retrieve the lost gear.  Chair: Consider defining 'promptly' and setting 'dissemination' standards. Requesting the WCPFC Secretariat's views on what would align with other adopted practices.							
20. (NEW) Starting in 2027, the Secretariat shall create and present an annual summary report to the Commission [and relevant subsidiary bodies] on ALDFG related data using the information provided in CCM annual reports.			This report may be useful to go to SC and TCC, rather than (or in addition to) the Commission noting that the information required to be reported to the WCPFC Secretariat is paragraph 14 (ports with adequate reception facilities) and paragraph 19				

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<p>Chair: Seeking the WCPFC Secretariat’s advice on the amount of work that may be associated with this provision, based on discussions with the SPRFMO Secretariat.</p>		<p>conservation and management measures, and should not be classified as discarding garbage.</p> <p>Moreover, the types of fishing gear used by vessels in the Western and Central Pacific differ significantly from those managed by the South Pacific Regional Fisheries Management Organisation (SPRFMO), rendering direct comparisons inappropriate. Therefore, a tailored analysis specific to each region is necessary.</p> <p>Furthermore, the obligation to notify the secretariat would impose a considerable additional workload. Observations from SPRFMO’s implementation indicate that this requirement has not been executed smoothly, and its practicality remains a matter of debate.</p>	<p>(information from paragraph 17 on ALDFG).</p>				

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		In light of these considerations, China regrets that it cannot endorse the proposed modifications.					
<p><b>Capacity development, training and research</b></p> <p>Chair: Consider including a provision on gear marking. Consider including a provision to encourage CCMs to increase the number of adequate port reception facilities.</p>					We see value in including an obligation to require consistent and durable gear marking, to ensure that vessels and CCMs can be held to account when gear is abandoned or lost. Gear marking requirements has been shown to reduce the rates of gear loss when implemented effectively. In addition to gear marking, ensuring gears are not used past its “life”, is also a useful practice to reduce gear loss.		
<p>21. CCMs are encouraged to undertake research into marine pollution <b>[ANCORS: (including underwater noise)]</b> related to fisheries in the WCPFC Convention Area to further develop and refine measures to reduce marine pollution, and are</p>							ANCORS: Amend Paragraph 21 to read as follows: “CCMs are encouraged to undertake research into marine pollution (including underwater noise), related to fisheries in the WCPFC Convention Area to further develop and refine measures to

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encouraged to submit to SC and TCC any information derived from such efforts.							reduce marine pollution...”
22. CCMs are encouraged to develop communication frameworks to enable the recording and sharing of information on <span style="color: green;">lost</span> fishing gear <span style="color: red;">loss</span> in order to reduce loss and facilitate recovery of fishing gear.							
23. CCMs are further encouraged to develop frameworks or systems to assist fishing vessels to report the loss of gear to their flag State, relevant coastal States, and the Commission.							
24. CCMs are encouraged to conduct training and awareness programs for the crew and master of fishing vessels flying their flag regarding the impacts of marine pollution <span style="color: green;">[ANCORS: , including underwater noise,]</span> and operational practices to <span style="color: green;">prevent and</span> eliminate marine pollution caused by fishing vessels.							ANCORS: Amend Paragraph 24 to read as follows: “CCMs are encouraged to conduct training and awareness programs for the crew and master of fishing vessels flying their flag regarding the impacts of marine pollution, including underwater noise, and operational practices to prevent and eliminate marine

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Text <i>[Proponent: (source) amendment]</i>	Canada	China	FFA	Japan	New Zealand	PNAO	Observers
							pollution caused by fishing vessels.”
<b>Review and implementation</b>							
<p>25. This measure will be reviewed by the Commission in [2028] to consider strengthening the measure. every 3 years to consider expanding the scope of measure with respect to the elimination of marine pollution caused by fishing vessels.</p> <p>Chair: Consider revision period.</p>	<p>Canada agrees with the FFA. Our preference would be to include a date and recurrence period so that it is included in future workplans of the Commission.</p> <p>For example, “This measure will be reviewed by the Commission every 3 years, starting in [20XX], to consider [...]”</p>		<p>Revision period to be discussed within Subsidiary Bodies, making sure it aligns with Subsidiary Bodies and Commission’s workplans.</p>				
<p>26. The date of implementation for this measure is 1 January 2026<del>19</del> [FFA: 2028].</p> <p>Chair: Consider implementation date.</p>	<p>We agree that implementation start date would need to be at least one year after the Commission adopts the measure.</p>	<p>Overall, given the current state of fishing vessel facilities, the operational environment for crew members, and the port disposal capabilities in Pacific island nations, there exists a notable discrepancy with the requirements outlined in Canada’s revised measures. Consequently, achieving full compliance with all</p>	<p>Implementation start date at least a year after approval by WCPFC.</p>				

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		stipulated requirements within a short timeframe presents significant challenges.					