



Written Submission for the FINA Pre-Budget Consultations in Advance of the 2019 Budget

Ghost gear: a global threat

As a global community, we all depend on our oceans and the health of the marine life within them. Oceans drive our climate, supply us with food, provide livelihoods, and play a critical social, environmental and economic role for us. But they are increasingly inundated with marine debris, restricting their ability to perform these crucial functions. It is estimated that at least **640,000 tonnes**¹ of fishing gear and related litter are lost or abandoned in our oceans each year. Abandoned, lost or otherwise discarded fishing (ALDFG or “ghost gear”) (along with balloons and plastic bags) is the source of pollution posing the greatest entanglement risk to marine life.² World Animal Protection estimates that ghost gear entanglements and kills at least 136,000 seals, sea lions and large whales each year.

Ghost gear costs governments and marine industries hundreds of thousands of dollars annually in clean-up expenses and lost fishing time.³ It also compromises yields and income in fisheries – an estimated 10 percent of global decline in fish stocks has been attributed to ghost gear⁴, which is significant given that many stocks are already over-fished and on the brink of collapse. Waning fish stocks also threatens food security since a large portion of the world’s fishing economy both depend on fisheries for their livelihood and food supply. Overfishing (including bycatch) together with climate change and pollution, such as ghost gear, are by far the most

¹Macfadyen, G., Huntington, T., Cappell, R. Abandoned, lost or otherwise discarded fishing gear. UNEP Regional Seas Reports and Studies, No. 185; FAO Fisheries and Aquaculture Technical Paper, No. 523. Rome, UNEP/FAO. 2009. 115p.

²Wilcox, C., Mallos, N.J., Leonard, G.H., Rodriguez, A., and Hardesty, B.D. Using expert elicitation to estimate the impacts of plastic pollution on marine wildlife. *Marine Policy*, No. 65; 107-114.

³Mouat, J., Lozano, R. L., and Bateson, H. Economic Impacts of Marine Litter. KIMO. September 2010.

⁴While the effects on different types of fish species may differ dependent on the types of ghost gear most prevalent in certain areas, it is estimated that, on a global level, ghost gear has led to a reduction in fish stocks of 10 percent or more. The National Oceanic and Atmospheric Administration (NOAA) have found that ghost gear is directly responsible for a 5 percent reduction in total cod catch in the Baltic sea and a 30 percent reduction of Greenland halibut off the coast of Norway: NOAA Marine Debris Program. 2015 Report on the impacts of “ghost fishing” via derelict fishing gear. Silver Spring, MD. 25pp. The Virginia Institute of Marine Science recently published the findings of a 6-year study on the economic value of removing ghost gear which showed that removing some of the derelict crab pots in the Chesapeake Bay yielded an additional US\$20 million in harvest for local fishermen. If extended to a global level, the study showed that removing just 10 percent of ghost gear could increase landings by close to 300,000 metric tons: Scheld, A.M., Bilkovic, D.M., and Havens, K.J. (2016) The Dilemma of Derelict Gear. *Scientific Reports* 6, Article Number 19671. <http://www.nature.com/articles/srep19671>

dominant cause of fish stock decline. Of all known marine mammal species, over 40 percent have been affected by ghost gear, with many of these species being on the International Union for Conservation of Nature Red List of threatened species.⁵

The adverse impacts of ghost gear have been made even worse by the introduction of non-biodegradable or plastic fishing gear, predicted to persist in the marine environment for up to 600 years.⁶ By weight, ghost fishing gear accounts for over half of all macro plastics in our oceans today⁷ which will eventually break down into micro-plastics, be consumed by marine animals and, ultimately, enter the human food chain. To protect the health and productivity of our oceans, urgent global action on ghost gear by all stakeholders (governments, intergovernmental bodies, private sector and civil society) is needed now.

Global Ghost Gear Initiative

A cross-sectoral alliance launched by World Animal Protection in 2015, the Global Ghost Gear Initiative (GGGI) is committed to driving solutions to the problem of lost and abandoned fishing gear worldwide. It is an established lead platform for the global community to unite together to improve the health and productivity of marine ecosystems, protect marine animals from harm, and safeguard human health and livelihoods.

The GGGI has successfully grown since its launch and is now supported by inter-governmental organizations such as the United Nations Food and Agriculture Organisation (FAO) and the United Nations Environment Programme (UNEP), and 12 national governments. With over 70-member organizations, its membership includes representatives from the fisheries sector, industry, retail corporations, academia, and non-governmental organizations (NGOs). The GGGI acts as a global clearinghouse for information on ghost gear, informs relevant policy processes in both the public and private sector, and catalyzes practical and replicable solutions for on-the-ground and in-the-water removal and prevention of ghost gear.

The GGGI's membership is organized into three integrated working groups to directly tackle the global ghost gear problem in the following ways:

- **Build evidence:** Collecting data locally and regionally and standardizing it globally to understand ghost gear abundance, causes, impacts and trends. The evidence will then be used to prioritize solutions in 'hotspot' areas.
- **Define best practices and inform policies:** Developing best practice guidance on the management of fishing gear at the different stages of its life. The *Best Practice Framework for Fishing Gear Management* was recently developed in close consultation with industry stakeholders. The framework provides practical guidance to prevent and

⁵ Werner, S., Budziak, A., van Franeker, J., Galgani, F., Hanke, G., Maes, T., Matiddi, M., Nilsson, P., Oosterbaan, L., Priestland, E., Thompson, R., Veiga, J. and Vlachogianni, T. Harm caused by Marine Litter. MSFD GES TG Marine Litter - Thematic Report; JRC Technical report; EUR 28317 EN; doi:10.2788/690366, 2016, 13p.

⁶ Reference to this can be found in: Approximate Time it Takes for Garbage to Decompose in the Environment: https://www.des.nh.gov/organization/divisions/water/wmb/coastal/trash/documents/marine_debris.pdf; and Macfadyen, G., Huntington, T., and Cappell, R. Abandoned, lost or otherwise discarded fishing gear. UNEP Regional Seas Reports and Studies, No. 185; FAO Fisheries and Aquaculture Technical Paper, No. 523. Rome, UNEP/FAO. 2009. 115p.

⁷ Moss, E., Eidson, A., and Jambeck, J. Sea of Opportunity - Supply Chain Investment Opportunities to Address Marine Plastic Pollution. Encourage Capital on behalf of Vulcan, Inc., New York, New York. February 2017. 22p.

mitigate the impacts of lost fishing gear across the seafood supply chain, from gear manufacturers to port operators to the fishing industry.

- **Catalyse and replicate solutions:** Expanding scalable and replicable solutions that develop new ways to tackle the problem of ghost gear. Focus is placed on holistic solutions that can evolve into sustainable business models. A few of the several solutions projects underway include:
 - FAD TRACKING, SOUTH PACIFIC: This project aims to use satellite technology to track FADs throughout the South Pacific to better understand the scope of the problem of lost and drifting FADs in the region.
 - GEAR MARKING, INDONESIA: FAO provided funding to this project that involves the gear marking of gillnets to evaluate best practice measures in small scale fisheries.
 - VAQUITA PROJECT, MEXICO: This project involves using side scan sonar to search for and remove lost gill nets used in the illegal totoaba fishery that catches and kills vaquita as by-catch.
 - NET RECYCLING, ALASKA: The US government through NOAA's National Fish & Wildlife Foundation provided funding to this project, which involves finding solutions for end of life gear in Dutch Harbor, Alaska. Trident Seafood provided significant logistical support to collect and transport nets to Plastix Global who will recycle them into plastic pellets to be used in various products.

Relevance and opportunities for action on ghost gear

Canada's mandate

Canada boasts the longest coastline in the world and some of the most vibrant, charismatic and commercially important animals live in its waters. The Canadian government has acknowledged the importance of ocean ecosystems, both intrinsically and for their commercial and leisure value. The mandate and aims of the GGGI are aligned with those outlined in Prime Minister Trudeau's mandate letter to the Minister of Fisheries and Oceans and the Canadian Coast Guard⁸ as well as with Canada's commitment to ocean protection, its "precautionary approach" to managing fisheries and its recent marine debris commitments made at the United Nations 'Our Oceans' conference last year and the G7 this year.

The GGGI is an exciting and pioneering initiative that is increasingly being joined by key stakeholders in the critical marine sector. Financial support for the GGGI will help to ensure its long-term functioning and growth to continue preventing and mitigating the impacts of ghost gear while offering a platform for Canada to meet its commitments as above. **World Animal Protection recommends the Government of Canada signs onto the GGGI and commits \$1.2M over four years to protect its fishing industry, marine life, and ocean health by combatting ghost gear.**

⁸ Addressing ghost gear in Canada would contribute to the goals in the mandate letter, including increased protections to ensure the "health of our fish stocks", "monitor contaminants and pollution on our oceans", and "incorporate modern safeguards to protect our oceans and freshwater fish habitat" (see mandate letter: <http://pm.gc.ca/eng/minister-fisheries-oceans-and-canadian-coast-guard-mandate-letter.>)

A competitive edge

Concern about marine debris, entangled whales and declining fishing stocks are on the minds of Canadians and businesses with a vested economic interest in healthy oceans. Ocean plastic is quickly rising to become one of the top concerns for sustainably-minded seafood companies and ghost gear is acknowledged to be one several key issues detrimentally impacting ocean life, marine ecosystems and sustainable fisheries. As the landscape changes, companies are eager to include ghost gear in their sustainable sourcing policies. Just this year, several high-profile seafood companies and grocery retailers have joined the GGGI⁹, a recognition that the GGGI is the platform to address the problem of fishing-related marine debris and ghost gear.

Given Canada's vibrant fishing industry and the global nature of the seafood supply chain, where companies in Canada may source from abroad and retailers such as Marks & Spencer or Waitrose in the UK purchase Canadian seafood, proactively addressing the problem of ghost gear in Canadian fisheries would ensure we have a competitive advantage when meeting the demands of an ever-changing market.

About World Animal Protection

World Animal Protection is one of the largest animal welfare organizations in the world, pioneering sustainable, large-scale solutions to animal suffering. World Animal Protection seeks to improve the lives of animals in communities, in farming, in disasters, and in the wild (including marine wildlife), with specific campaigns ranging from stopping the mass suffering of industrially farmed animals to ending the inhumane culling of stray dogs.

Thank you for the opportunity to make this submission and for your consideration of this request.

Lynn Kavanagh
Campaign Manager, Oceans and Wildlife
World Animal Protection, Canada

⁹ Marks and Spencer, Waitrose, Thai Union and Ocean Brands (a Canadian company), among others