A RESPONSE TO THE BEST PRACTICE FRAMEWORK FOR THE MANAGEMENT OF FISHING GEAR 2017

Results from a consultation with the fishing industry and other stakeholders



BACKGROUND

Each year an estimated 640,000 tons of fishing gear is lost or abandoned in oceans, estuaries, and bays. It accounts for around 10% of all marine litter. Whether intentionally discarded or accidentally lost, this 'ghost gear' stays in the oceans for hundreds of years and is a growing problem in many marine environments worldwide.

Ghost gear is recognised as one of the deadliest forms of marine litter. It catches and wastes targeted marine species. It also entangles other marine wildlife, adds to ocean garbage, and is expensive and hazardous for fishermen and marine communities to deal with.

Fishing gear loss occurs for a variety of reasons. It may be lost through storms, interaction with other gear or vessels, or vandalism. More rarely it may also be abandoned or discarded.

ABOUT THE GLOBAL GHOST GEAR INITIATIVE (GGGI)

The GGGI was founded in 2015 by World Animal Protection to tackle Abandoned, Lost or otherwise Discarded Fishing Gear (ALDFG) also known as ghost gear. This unique initiative's membership works collaboratively to address the ghost gear problem by building evidence, developing best practices for fishing gear management and catalysing and replicating solutions.

It includes about 80 members from the fishing industry, governments, academia and NGOs, and the membership continues to grow. Together they are dedicated to improving the health of marine ecosystems, protect marine animals, and safeguarding human health and livelihoods.



Raymond Kacso / Marine Photogrank

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SPECIAL THANKS

World Animal Protection and the GGGI would like to thank everyone who participated in this consultation for their time and invaluable feedback. Your insightful responses will ensure a timely and practical implementation of the Best Practice Framework that will benefit the fishing industry, the environment and the animals that share it.

INTRODUCTION

The Best Practice Framework for the Management of Fishing Gear was developed through the Global Ghost Gear Initiative's (GGGI) 'Define best practices and inform polices working group'. This group is also known as the 'Best practice working group'.

The framework was written by Tim Huntington of Poseidon Aquatic Resource Consultants Ltd in conjunction with the working group. The GGGI membership also provided input. Delegates at the GGGI Annual General Meeting in October 2016 agreed that external stakeholders, particularly those involved in fishing or seafood marketing/retail, should be consulted. The penultimate draft was completed in December 2016.

The aim is for the Best Practice Framework to be adopted as part of these stakeholders' sustainable sourcing and fisheries management policies. It includes guidelines and powerful case studies that show how to prevent ALDFG and lessen the impact if lost.

It is organised into easy-to-follow sections aimed at specific stakeholder groups across the seafood supply chain – from gear manufacturers to retailers. The framework also features guidelines for other groups with a vested interest in fisheries and ocean protection including fisheries managers and NGOs.

It uses a **prevent, mitigate** and **cure** approach. Best practice principles and actions for each stakeholder group fall into one of these three categories. Actions are primarily focused on prevention, but mitigation and cure actions are included for cases where gear is inadvertently lost.



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STRUCTURE OF THE FRAMEWORK

As proposed by Macfadyen et al (2009), interventions can be broadly divided between measures that:

prevent (avoiding the occurrence of ALDFG in the environment)

mitigate (reducing the impact of ALDFG in the environment)

cure (removing ALDFG from the environment).

1.	Spatial and / or temporal measures	
2.	Gear design to reduce whole or partial loss of the fishing gear	
3.	Vessel design to reduce gear and other marine litter discarding	
4.	Better marking and identification of fishing gear	PREVENTION
5.	Improved redundant fishing gear disposal facilities	PREVENTION
6.	Education and awareness	
7.	Improved fisheries management regime	
8.	Good practice for avoidance, mitigation and response	
9.	Gear design to reduce the incidence and duration of ghost fishing	MITIGATION
10.	Lost gear reporting, location and recovery initiatives	CURE

The framework recognises the diverse roles and responsibilities of different stakeholders in managing fishing gear and identifies best practice approaches for each stakeholder type. For each type the following structure is used.

- **Principles of best practice:** includes a brief statement about the role of the stakeholder group in gear and ALDFG management and provides a brief set of basic principles.
- Key best practice actions and approaches: advocates as set of best practices against the principles and identified main collaborating partners.
- **Case study:** a brief case study to illustrate current best practice in this stakeholder group.

STAKEHOLDERS ADDRESSED BY THESE GUIDELINES

STAKEHOLDER GROUP	ROLE	BEST PRACTICE AREAS
Gear designers and manufacturers	Design, production and sale of fishing gear	Embedded traceability; research into, and use of / integration of biodegradable materials for use in the marine environment; incentives to return redundant / used gear.
Fishers	Individuals and crew catching seafood at sea	Reduced soak times; gear use limits in high-risk areas and during high-risk times; marking and identification of fishing gear; responsible storage of gear; reporting of lost gear, guidance on lost / abandoned gear location and retrieval.
Fisheries organisations	Non-statutory organisations representing fishers	Code of practices specific to fisheries; spatio-temporal agreements with other metiers; monitoring of fishing gear losses; communication protocols.
Port operators	Bodies operating and managing fishing ports	Accessible, low-cost gear and litter disposal facilities; integration into recycling initiatives; better awareness of responsible disposal opportunities; implement 'check out-check in' gear inventories where appropriate.
Fisheries managers and regulators	Management bodies setting policy, plans and regulations for fishing activities	Designation of spatio-temporal restrictions in high risk areas; development of appropriate gear marking and identification regulations; development of technical regulations to reduced ghost fishing potential in high risk areas; conducting impact assessment to gauge unintended consequences of management actions on gear loss and ghost fishing.
Fisheries control agencies	Body or agency responsible for enforcing fisheries regulations	Establish registry and database of lost / abandoned gear; enforcement of gear marking and identification regulations.
Fisheries and marine environment research	Research and development	Development of biodegradable materials acceptable to fishers, but effective at reducing gear-catching ability after control is lost.
Seafood ecolabel standard and certificate holders	Setting and maintaining standards for responsible sourcing of seafood	Gear loss and its consequences (eg ghost fishing) need to be included in all seafood sustainability standards, with supporting guidance provided where necessary.
Seafood companies	Fleet operators, processors, wholesalers and retailers	Encouraged to ensure that their seafood sourcing avoids high risk fisheries and that they participate in relevant initiatives eg gear recycling (see case study in Section 3.9.3) where possible.
NGOs	Advocates for sustainability and good practices	Coordination of advocacy, actions and information gathering; contributing to a centralised ALDFG / ghost fishing information hub / forums; organising ALDFG recovery in vulnerable areas.

CONSULTATION PROCESS

After a tender process run by World Animal Protection, Ocean Outcomes (O2), a US-based sustainable fisheries NGO, was hired in January 2017 to work on the external consultation. The goal was to seek input from fishing industry and related stakeholders on the content, relevance and feasibility of the Best Practice Framework in addressing ALDFG.

Launched in April 2017 the consultation process was promoted to relevant industry players in the following ways:

- distributing a press release to industry media
- giving out Best Practice Framework information postcards at the Seafood Expo North America in Boston in March
- publicising the consultation (survey, webinar or both) and inviting participation through GGGI and O2 contacts
- directing Google users through a Google AdWords campaign to the Best Practice Framework survey on the GGGI website

 hosting a GGGI side event at the SeaWeb Seafood Summit that included a Best Practice Framework presentation and promoted the consultation.

Feedback was sought through two avenues: an anonymous online survey, developed by O2, and a series of one-hour webinars with targeted stakeholder groups.

Sixty-four people completed the survey. They responded to direct questions about familiarity with ghost gear and ghost fishing, the relative importance of the issue (from the respondent's perspective), and the Framework's strengths and weaknesses. This process generated input from fishers and fisheries representatives, NGOs, seafood marketers, retailers, and other interested parties.

Thirteen webinars were held with 38 participants from NGOs, fishing associations, seafood companies and standards bodies. Each webinar involved a presentation about the Best Practice Framework and allowed ample time for discussion between GGGI and O2 representatives, and the invited participants.



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DESCRIPTIVE SURVEY RESULTS

Background questions asked about people's affiliation, region and fishery. Other questions explored their ghost gear knowledge, its importance in the sustainable seafood landscape and their likelihood of addressing the issue within the next three years.

Many of the questions permitted participants to select more than one response category ('check all that apply'). This means the number of responses may be higher than the number of respondents to the question (see Appendix 1 for the full survey).

Most survey participants were from North America, followed by Europe/Iceland and Southeast Asia Representatives from most regions of the globe (Southeast Asia, South America, Australia / New Zealand, Central America, etc) participated in the survey.

Table 1. Please identify your primary work or business geography(ies) - choose any that apply.

ANSWER CHOICES	RESPONSES (%)	RESPONSES (#)
North America	58	37
Central America	6	4
South America	9	6
Europe / Iceland	16	10
Africa	2	1
Australia / New Zealand	8	5
Indonesia	6	4
Pacific Islands	3	2
Central Asia	0	0
Southeast Asia	14	9
Northeast Asia	6	4
Global	5	3
	Total respondents	64

Only 24 respondents identified their affiliation; of those that did, most were seafood retailers or processors, NGO representatives, and fishers. There were only a few representatives from academia; government; fisheries / seafood certification, ratings or standard setting; and gear design – manufacturing or retail.

The only primary stakeholder group not represented with a survey response is the 'port representative' group.

Table 2. Please choose the category below that best identifies yourself.

ANSWER CHOICES	RESPONSES (%)	RESPONSES (#)
Fisher or fishery representative	17	4
Seafood retail, wholesale or broker, or processor	21	5
Government fishery management, monitoring, or enforcement	8	2
NGO	21	5
Fisheries / seafood certification, ratings or standard setting	4	1
Academic or government researcher / scientist	13	3
Port representative	0	0
Gear designer, manufacturer, or retailer	4	1
Other (please specify)	13	3
	Total respondents	24

Fishing gears used by respondents (in order of most-used) included: gillnet; trawl; bottom pots, traps or cages; purse seine, and longline. Fewer respondents used pole and line or handline, or Fishing Aggregating Devices (FADs), as those gears are mostly restricted to tuna fishing. When respondents chose 'other gears' they specified this to include: suriperas (traditional bottom nets); coastal trap nets / set nets; beach seines; estuarine set-bag nets; demersal longlines, and aquaculture lines and cages.

Table 3. If a fishery manager, fisher, member of a fishing association, or part of a seafood company which sources from specific fisheries, please identify the gear type(s) involved – choose any that apply.

ANSWER CHOICES	RESPONSES (%)	RESPONSES (#)
Trawl	32	20
Gillnet	35	22
Purse seine	24	15
Pole and line or handline, including jigging	11	7
Longline	22	14
FADs	5	3
Bottom pots, traps or cages	32	20
Not applicable	33	21
Other (please specify)	11	7
	Total respondents	63

Most respondents identified with a specific target species or group of species. Groundfish-whitefish and crab/ lobster were the most popular. They were followed by: tuna; shrimp; salmon; highly migratory species; pelagic forage species, and squid. Other target species included: halibut; scallops, and shellfish (oysters, clams).

Table 4. If a fishery manager, fisher, member of a fishing association, or part of a seafood company which sources from specific fisheries, please identify the species involved – choose any that apply.

ANSWER CHOICES	RESPONSES (%)	RESPONSES (#)
Groundfish-whitefish	30	19
Tuna	24	15
Other highly migratory species, eg swordfish, marlin, mahi mahi	14	9
Salmon	21	13
Shrimp	24	15
Crab, lobster	30	19
Squid	10	6
Pelagic forage species (eg sardines, anchovies, mackerel)	14	9
Not applicable	33	21
Other (please specify)	10	5
	Total respondents	63

Most people reported having a moderate or high level of knowledge of ghost gear and its impacts; very few had little or none. Within their primary organisational or business enterprise, most people reported ghost gear is a significant or somewhat significant seafood and/or marine sustainability issue. However, in the context of activities outside of their primary organisational or business enterprise, more people reported ghost gear as a significant, moderately significant, or highly significant seafood and/or marine sustainability issue.

Table 5. How would you describe your level of knowledge of ghost gear and its impacts?

ANSWER CHOICES	RESPONSES (%)	RESPONSES (#)
None	2	1
Little	3	2
Some	23	15
Moderate	39	25
High	33	21
	Total respondents	64

Table 6. In the context of your primary organisational or business enterprise, how significant would you rank ghost gear as a seafood and/or marine sustainability issue?

ANSWER CHOICES	RESPONSES (%)	RESPONSES (#)
Not an issue	9	6
Somewhat significant	23	15
Moderately significant	17	11
Significant	33	21
Highly significant	17	11
	Total respondents	64

Table 7. In the context of activities outside your primary organisational or business enterprise, how significant would you rank ghost gear as a seafood and/or marine sustainability issue?

ANSWER CHOICES	RESPONSES (%)	RESPONSES (#)
Not an issue	3	2
Somewhat significant	8	5
Moderately significant	30	19
Significant	39	25
Highly significant	20	13
	Total respondents	64

Most respondents thought it was somewhat likely that the Best Practice Framework would lead them to change their fishing, sourcing or other business-organisational practices in the next 1-3 years. Many respondents thought that regulatory approaches are best suited for managing ghost gear and its impacts, followed by supply chain and certification approaches.

Government approaches had the least support, though it is not immediately clear what the respondents believe to be the primary differences between regulatory and government approaches.

Table 8. How likely is it that the GGGI Best Practice Framework would lead you to change your fishing, sourcing or other business-organisational practices in the next 1-3 years?

ANSWER CHOICES	RESPONSES (%)	RESPONSES (#)
Highly unlikely	4	1
Unlikely	8	2
Somewhat likely	58	14
Likely	25	6
Highly likely	4	1
	Total respondents	24

Table 9. Which of the following approaches are best suited for managing ghost gear and its impacts?

ANSWER CHOICES	RESPONSES (%)	RESPONSES (#)
Supply chain approaches	50	12
Regulatory approaches	80	19
Government approaches	30	7
Certification approaches	50	12
	Total respondents	24

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QUALITATIVE FEEDBACK (WEBINARS AND OPEN-ENDED SURVEY QUESTIONS)

General feedback

Overall, the response from participants was positive. Many remarked that the Best Practice Framework is a good initiative to address a largely ignored problem. Most found both the guidance document and the background (scoping) document to be thorough and comprehensive. The fact that the framework included all stakeholders across the seafood supply chain was considered a strong point. And the prevention-mitigation-cure approach was thought to be a useful way to communicate the actions.

The consultation resulted in only minor revisions as much of the feedback centered on the feasibility of the Framework's implementation and adoption. Several participants made recommendations and provided insights as to how implementation could be done collaboratively and expeditiously.

Some ideas included:

- developing pilot projects such as Fishery Improvement Projects (FIPs)
- urging existing certification schemes to integrate the Best Practice Framework guidelines into their standards
- working with the fishing industry to ensure regulations reflect ghost gear prevention and mitigation.

Many stakeholders remarked that the framework is a long, densely-packed document, and suggested creating more digestible supporting material such as fact sheets and infographics. This would also help to simplify communication with fishing communities especially in cases where English is not spoken or not the first language.

Recurring themes emerged across both the survey and webinars and are discussed in more detail below.

Incorporating Best Practice Framework guidelines into existing certification standards

Since its founding, the GGGI has encouraged sustainable seafood certifiers such as Seafood Watch and Responsible Fishing Scheme to include ghost gear mitigation language into their standards. The importance of this activity was reinforced by several comments from seafood industry representatives whose businesses rely on certification as a mechanism to drive best practice. Certification schemes are an avenue by which change in the seafood supply chain could be readily adopted. This approach also relieves pressure on the industry of having to adopt another standalone set of standards.

Webinar participants from seafood certification and standards bodies identified opportunities to advocate for incorporating elements of the framework into their certification requirements and guidance.

The Marine Stewardship Council (MSC), for example, has begun its next five-year review of its standard which is currently weak on ghost gear issues. Fair Trade USA will also be undergoing a revision process soon. There will be an opportunity to provide recommendations for management of fishing gear in both these schemes and most likely in others as well.

Although a reference to gear management is included in these standards, both Fair Trade and MSC advised that recommendations should be very specific. They also emphasised the importance of providing guidance to certification schemes on assessment criteria to enable measurable evaluation.

Fishery Improvement

The opportunity to effectively demonstrate ghost gear best practice and incentivise positive changes through FIPs was reinforced by several comments during the consultation.

The GGGI already has some fishery and NGO partners working on 'solution projects' which contain elements or characteristics of a FIP (eg a gear-marking project in Indonesia). The development of a FIP specifically supports the opportunity to trial elements of the Best Practice Framework. This includes the development of a more comprehensive risk assessment and a tool to measure gear management and risk for ghost gear. It would also test the practicality of such standards.

There are many logistical challenges associated with fishing / boats (long hours, tight quarters, rough weather, etc) that can have a definite impact on realistic implementation of best practices. This process would support including detailed and specific gear management and ghost gear prevention standards into sustainable seafood standards as noted above.

Fishery management and regulation

Supply chain approaches and certification schemes were acknowledged as important avenues for facilitating change in gear management and ghost gear prevention. However, regulations were identified as the primary mechanism with which changes in behaviour and attitude would occur.

In the survey section above, regulations were chosen by 80% of survey respondents as a means to create action on ghost gear. Nonetheless, although regulatory approaches were supported by stakeholders as one of the primary avenues for action on ghost gear, some stressed the limitations to this approach. For example, in many jurisdictions affected by competing fisheries management regulations, handling another's gear is prohibited. This means derelict gear cannot be legally removed if it belongs to another fisherman.

Stakeholders also emphasised that competition for prime fishing areas causes gear conflict and only with fisher cooperation and participation from regulatory authorities can this common problem be addressed.

Direct engagement with fishers and fishing groups

The consultation process demonstrated the challenge of contacting and involving this stakeholder group. It highlighted that direct contact is perhaps the best way to encourage the implementation of positive ghost gear solutions.

Advice for connecting with this group included targeting off-season industry events and trade shows, where capturing a fisher audience is likely. Another good suggestion was to involve and inform fisher family members and fishing communities who are often the source of advocacy and action.

To date, the GGGI has approached and involved fishing associations and communities in different regions. Continuing to work collaboratively with this stakeholder group will be important in progressing the involvement of fishers and fishing groups and the adoption of best practices.

Hot spot map and other data

Participants thought it would be useful to show high risk areas on a heat or other map format. This is an active strategy area for GGGI and the strong support for the idea during the consultation warrants it receiving a high priority.

The 'Build evidence working group' of the GGGI is currently working on the development of a data portal and accompanying app. From there, it will be possible to develop supplemental materials suggested during the consultation. These included high risk fisheries, gear loss tables or 'heat maps', and a habitat risk map which could be integrated into navigation charts.

Recreational fisheries

Lost gear resulting from recreational fishers can be a significant contributor to the ghost fishing problem. This was mentioned on a few occasions during the consultation process. The issue was also raised by other stakeholders outside the consultation process and is an area that will likely become a GGGI focus in due course.



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CONCLUSIONS

With the successful industry consultation conducted by a joint team from GGGI and O2, the Best Practice Framework will be officially launched and finalised. The authors have edited and updated the document to reflect the feedback

that they received via the consultation. It is available for broad distribution to stakeholders across the seafood supply chain and others preventing mitigating, or curing the impacts of ghost gear and ghost fishing.

APPENDIX 1: ONLINE BPF FEEDBACK SURVEY

To combat ghost gear, the Global Ghost Gear Initiative (GGGI) has developed the Best Practices Framework for the Management of Fishing Gear, or BPF for short.

Ghost gear, also called 'Abandoned, Lost and otherwise Discarded Fishing Gear', or ALDFG for short, is any fishing equipment or fishing-related litter that has been abandoned or lost in the ocean environment. Each year an estimated 640,000 tons of fishing gear is lost or abandoned in oceans, estuaries, and bays. Whether intentionally discarded or accidentally lost, this gear sticks around for hundreds of years and it catches and wastes targeted marine species, entangles marine wildlife, adds to ocean waste, and presents additional expenses and hazards for fishermen and marine communities.

The BPF provides all fishery stakeholders, from fishermen to port operators, with practical

guidance to decrease the abundance and effects of ghost gear within their respective industries. This survey seeks

to gather feedback on the BPF, its recommendations, feasibility, strengths, and weaknesses.

Your feedback on the BPF is valuable to us and appreciated. It is important for us that this

framework is as practical and suitable as possible for the seafood industry and other stakeholders with a vested industry in fisheries and the ocean environment.

Your feedback will help us to make final revisions to the BPF before it is ratified and formally

launched at the SeaWeb Seafood Summit in June, 2017. As a thank you for your participation, we're giving away a free \$100 Amazon gift card to a random participant. If you wish to be included in the drawing, please enter your contact details during the survey.

Thank you for your participation!

PART 1: PARTICIPANT BACKGROUND

- 1. Please identify your primary work or business geography(ies) choose any that apply.
- North America
- Central America
- South America
- Europe/Iceland
- Africa
- Australia/New Zealand
- Indonesia
- Pacific Islands
- Central Asia
- Southeast Asia
- Northeast Asia
- Global
- 2. If a fishery manager, fisher, member of a fishing association, or part of a seafood company which sources from specific fisheries, please identify the gear type(s) involved choose any that apply.
- Trawl
- Gillnet
- Purse seine
- · Pole and line or handline, including jigging
- Longline
- FADs
- Bottom pots, traps or cages
- Not applicable
- Other (please specify)
- 3. If a fishery manager, fisher, member of a fishing association, or part of a seafood company which sources from specific fisheries, please identify the gear type(s) involved choose any that apply.
- Groundfish-whitefish
- Tuna
- Other highly migratory species, eg swordfish, marlin, mahi mahi
- Salmon
- Shrimp
- Crab, lobster
- Squid
- Pelagic forage species (eg sardines, anchovies, mackerel)
- Not applicable
- Other (please specify)

- 4. How would you describe your level of knowledge of ghost gear and its impacts?
- None
- Little
- Some
- Moderate
- High
- 5. In the context of your primary organisational or business enterprise, how significant would you rank ghost gear as a seafood and/or marine ecosystem sustainability issue?
- Not an issue
- Somewhat significant
- Moderately significant
- Significant
- Highly significant
- 6. In the context of activities outside your primary organisational or business enterprise, how significant would you rank ghost gear as a seafood and/or marine ecosystem sustainability issue?
- Not an issue
- Somewhat significant
- Moderately significant
- Significant
- Highly significant

If you would like to be entered into the drawing for the \$100 Amazon gift card, please enter your name and email below.

PART 2: GENERAL QUESTIONS REGARDING THE BPF

Prior to completing this section, please review the BPF on the GGGI website here.

The best practices are organised by stakeholder group and can be broadly divided between measures that prevent (avoiding the occurrence of ALDFG in the environment); mitigate (reducing the impact of ALDFG in the environment) and cure (removing ALDFG from the environment).

Each stakeholder group is presented with a matrix which defines the best practice in question and gives recommended preventative, mitigative, and curative steps which should be taken to reduce ghost gear. A summary outline of this matrix is as follows.

Stakeholder group > Best practice principle > Approaches (prevent, mitigate, cure) > Recommended best practice action

To answer the questions below, we recommend you review the section(s) most relevant for your stakeholder group.

What's your initial impression of the BPF?

How likely is it that the GGGI best practice framework would lead you to change your fishing, sourcing or other business-organisational practices in the next 1-3 years?

- Highly unlikely
- Unlikely
- Somewhat likely
- Likely
- High likely

Name at least two factors that would increase the likelihood of changing your current practices towards the recommended best practices in the BPF over the next 1-3 years?

What does the BPF do really well? Any specific sections, best practices, or recommendations which stand out for you?

What does the BPF lack? Please explain.

Which of the following approaches are best suited for managing ghost gear and its impacts?

- Supply chain approaches
- Regulatory approaches
- Government approaches
- Certification approaches

Please choose the category below that best identifies yourself.

- Fisher or fishery representative
- Seafood retail, wholesale or broker, or processor
- · Government fishery management, monitoring, or enforcement
- NGO
- Fisheries/seafood certification, ratings or standard setting
- Academic or government researcher/scientist
- Port representative
- Gear designer, manufacturer, or retailer
- Other (please specify)

PART 3: FISHER OR FISHERY REPRESENTATIVE SPECIFIC FEEDBACK

As a key ghost gear stakeholder, this final section of the survey focuses specifically on the best practices recommended for your stakeholder group: '4.2 Fishers' and '4.3 Fisheries Organisations'. Please review section 4.2 and 4.3 in more detail and provide specific answers to the following questions.

Note: the questions below were provided for every stakeholder group, and focused on the relevant principles, best practice actions and approaches for that group based on the respondent's affiliation.

Do the below principles in 4.2 adequately capture the key issues in this section?

- Yes
- No
- Partially

If no or partially, please describe what's potentially not important, missing, or would benefit from modification. Please provide your suggestions as specifically as possible in the text box below including what specific changes suggested, if any.

Are the **best practice actions and approaches** bullet points for prevention, mitigation, and cure, appropriate and practical as a response to meeting the principles in 4.2 as a way of promoting the prevention of ghost gear?

- Yes
- No
- Partially

If no or partially, please describe what's potentially not important, missing, or would benefit from modification. Please provide your suggestions as specifically as possible in the text box below including what specific changes suggested, if any.

Do the below principles in 4.3 adequately capture the key issues in this section?

- Yes
- No
- Partially

If no or partially, please describe what's potentially not important, missing, or would benefit from modification. Please provide your suggestions as specifically as possible in the text box below including what specific changes suggested, if any.

Are the **best practice actions and approaches** bullet points for prevention, mitigation, and cure, appropriate and practical as a response to meeting the principles in 4.3 as a way of promoting the prevention of ghost gear?

- Yes
- No
- Partially

Any other feedback on sections 4.2 and 4.3?

Would you like to provide specific feedback on another stakeholder section? Please select an option below and hit the 'Next' button.

- Fisher or fishery representative
- Seafood retail, wholesale or broker, or processor
- · Government fishery management, monitoring, or enforcement
- NGO
- Fisheries/seafood certification, ratings or standard setting
- · Academic or government researcher/scientist
- Port representative
- Gear designer, manufacturer, or retailer

No further feedback, submit my responses!

Global Ghost Gear Initiative

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