



CCSBT-CC/1910/10

Potential Non-Member Fishing Activity & Trade/ Emerging Markets

1. Introduction

This paper provides:

- China's response regarding the Ping Tai Rong Fleet activities in 2018;
- A note about the Secretariat's contingency fund with Trygg Mat Tracking;
- A summary of the Secretariat's research into alternative sources of trade data to the Global Trade Atlas (GTA);
- A summary of relevant correspondence about trade with Non-Cooperating Non-Members (NCNMs); and
- A brief summary of SBT trade information between 2016 and 2018 based on the United Nations (UN) COMTRADE database.

2. Potential Non-Member Fishing Activity

Chinese Flagged Vessels in the Southern Indian Ocean

In July 2018, the Indian Ocean Tuna Commission (IOTC) Secretariat advised the CCSBT Secretariat that an observer alleged SBT were being transhipped to the Chinese-flagged Carrier Vessel Ping Tai Rong Leng2 (PTRLeng2) by seven Chinese-flagged Ping Tai Rong (PTR) fleet longliners. Based on the observer's deployment report, the IOTC wrote a letter to its Chinese Commissioner (refer to **Attachment A** – letter dated 1 September 2018, in copy to CCSBT).

This letter was received by China before PTRLeng2 arrived into its home port in Zhoushan where it was expected to unload. It reiterated the observer's allegations that multiple transhipments of southern bluefin tuna incorrectly labelled as yellowfin tuna had occurred from a number of PTR longliners. In total the observer estimated there were a minimum of 180 SBT present in the last five transhipments received by PTRLeng2

Follow-up by CCSBT

Immediately upon receipt of the IOTC's letter (detailing the transhipment observer's findings), the CCSBT Secretariat followed up with its own letter to the IOTC's Chinese Commissioner which is provided at **Attachment B**.

China provided a brief email response to the CCSBT's letter noting that, "... internal investigation both on the fishing vessels and carrier vessel, as well as the vessel owner/the fishing company, would initiate as the carrier vessel calls Chinese port " and, "we will come back to the IOTC and CCSBT with the outcome of the investigation and the actions against the vessel owner when all necessary procedures are finished by this side."

The above information was reported to the October 2018 meetings of the Compliance Committee (CC) and Extended Commission (EC).

Response from China

China did not respond to the CCSBT on this matter but did provide a response to IOTC's Executive Secretary dated 8 March 2019. That response is provided at **Attachment C**. In China's letter to IOTC, China notes it carried out an investigation of the PTRLeng2 on 06/09/18 in Zhoushan and called all seven of the PTR longliners concerned back to port for further investigation. The longliners did not arrive in Zhoushan until 7 and 8 October 2019. China reported that the resulting investigation indicated that, "*no bluefin tuna was found during the investigation*", and, "*there is no evidence indicating that Ping Tai Rong Leng 2 has conducted illegal transshipment at sea of the southern bluefin tuna*".

3. Contingency Fund with Trygg Mat Tracking (TMT)

In 2018 CCSBT 25 agreed to a small budget (AUD \$20,000) for the Secretariat to contract Trygg Mat Tracking (TMT) on an ad-hoc basis to conduct analyses of Automatic Identification System (AIS) data and examine vessel company relationships as a follow-up to reports that may be provided to the Secretariat on suspicious fishing activity in SBT fishing grounds during 2019. An agreement for these services was signed on 1 February 2019 and an initial payment of \$9,969 (US \$7000) was made to TMT to be held in an operating fund pending CCSBT analysis requests. The Secretariat advises that to date it has not requested any ad-hoc analyses to be conducted by TMT during 2019, and therefore the operating fund has not yet been utilised.

4. Trade and Emerging Markets

4.1. Background

The EC of CCSBT 25 requested the Secretariat investigate alternative sources of trade data statistics because some Members were concerned as to whether the Global Trade Atlas (GTA) could be considered an official information source.

In addition, the 13th meeting of the Compliance Committee (CC13) requested that the Secretariat contact Lebanon and Jordan to advise that CDS documents should accompany SBT imports. CC13 also requested that Members and Non-Members investigate likely errors in the Global Trade Atlas relevant to them and report back, more specifically:

- Australia, the EU and the USA indicated that they would investigate the issues relevant to them and report back;
- The EU was to investigate an apparent export of 18t of SBT from Spain to Italy, reported in the GTA database and advise the Secretariat; and
- Indonesia noted the under-representation of its SBT exports in the GTA database compared to CDS figures and was to contact the relevant Indonesian authorities to resolve the under-representation of Indonesia SBT exports in the GTA database compared to CDS figures.

The EU provided a response concerning its trade data on 25 January 2019 and this was communicated to all Members in CCSBT Circular #2019/006 (extract at **Attachment D**).

4.2 Communications with Non-Cooperating Non-Members (NCNMs)

During 2019 the Secretariat has made contact with various NCNMs concerning trade and CDS queries.

Canada

The Secretariat has established contact with relevant officials at Fisheries and Oceans, Canada and is still progressing queries regarding reported SBT imports into Canada.

Lebanon and Jordan

CC13 tasked the Secretariat with contacting Lebanon and Jordan to advise that CCSBT's CDS documents should accompany any imports of SBT. The Secretariat tried to contact both Lebanon and Jordan in April and May 2019.

The Secretariat successfully conveyed some initial information about the CDS to Lebanon and received an acknowledgement in due course. As suggested by a Lebanese official, the Executive Secretary then wrote an official letter to Lebanon (**Attachment E**) requesting that it consider:

- not accepting imports of SBT product into Lebanon if unaccompanied by appropriate CDS documentation, and
- voluntarily sharing with the CCSBT any CDS documents received as well as SBT trade information.

No official acknowledgement or response has been received to this letter and the Secretariat's contact in Lebanon¹ has suggested that the Secretariat follow up with a second letter.

It was difficult to identify a relevant contact in Jordan and four email communications about CCSBT's CDS to a listed United Nations Food and Agriculture Organisation (UN FAO) representative to Jordan were not acknowledged. Therefore, the Secretariat cannot confirm whether information concerning CCSBT's CDS was received by Jordan.

Mauritius

Last year's summary of trade (refer to paper CCSBT-CC/1810/20) indicated that in 2016 and 2017 Mauritius had imported 1.61t and 2.02t of SBT from China respectively. The Secretariat contacted Mauritius and it advised that, "...no such imports are found in our records. It could probably be an error in misreporting or typing of HS Code."

Namibia

During May 2019 Namibia made initial contact with the CCSBT Secretariat noting that: "*One of our vessels is fishing in the southern atmosphere and they are piking up some Bluefin tuna. I want to find out what are the procedures for us to export these Bluefin tuna.*" Namibia has subsequently confirmed that: "*Our vessels have not landed any Bluefin species yet. I will still discuss our membership in the future with our management and will follow the application procedures as outlined by you if approved by management.*"

On contacting ICCAT about Namibia, ICCAT confirmed that Namibia has declared catches of SBT to it for 3 separate years: 1t (2005), 13t (2014) and 17t (2016).

4.3 New Source of Trade Statistics (UN COMTRADE)

The Secretariat conducted a search for sources of trade data other than the Global Trade Atlas (GTA) and concluded that the UN COMTRADE database may potentially be an alternative and cost-effective² option from which to source data for preparing future trade summaries.

The Secretariat checked the trade figures reported by the GTA database versus the COMTRADE database for the period 2015 to 2017 inclusive. As at January 2019, the total trade by product and Member were quite similar between the two databases. Out of a total of 231 tonnage values compared between the GTA and COMTRADE databases, 93% were the same, 3.5% differed by between 2t to 20t, and 3.5% differed by 20t or greater.

¹ An official at the Department of Fisheries and Wildlife, Ministry of Agriculture, Lebanon

² No subscription/payments are required to access UN COMTRADE data

The Secretariat also checked COMTRADE's data sources for each of CCSBT's Members as well as for some common Non-Cooperating Non-Member (NCNM) trading partners. A table of COMTRADE listed data sources is provided at **Attachment F**. To the best of the Secretariat's understanding, all data are derived from official sources.

Based on these findings, the Secretariat concluded that the UN COMTRADE database would be a suitable alternative source of trade data to replace the GTA. Therefore, the Secretariat did not renew its annual GTA subscription in January 2019³.

4.4 Summary of Trade Data from UN COMTRADE

The Secretariat has examined its CDS data as well as trade data from the UN COMTRADE database. In the CDS database and also in the EU's annual reports to the Compliance Committee and Extended Commission, only small imports of less than 0.1 tonnes are recorded as occurring between 2016 and 2018.

A summary of COMTRADE database information for SBT for the period 2016 to 2018 is provided at **Attachment G**. This summary does not include reported trade of live SBT as it has in previous years because the Secretariat has assumed that any recorded trade in live SBT is due to miscoding.

COMTRADE: Exports and Re-exports

Refer to Attachment G: Tables 1a-c

- Australia's total SBT exports for 2018 are recorded as 14,138.9t (for fresh/chilled and frozen SBT combined) in COMTRADE, which is quite a lot higher than reported in the CDS (9,371.8t) for 2018 – refer to paper CCSBT-CC/1910/04: Attachment C, Tables (C)i) and ii).
- Indonesia's SBT exports are well under-represented in all 3 years of the COMTRADE export statistics – COMTRADE records only 11t, 16t and 0.3t of total exports (fresh and frozen SBT combined) for 2016, 2017, and 2018 respectively.
- South Africa's exports are also well under-represented on the COMTRADE database – COMTRADE records only 2.5t, 31.8t and 42.6t of total exports (fresh and frozen SBT combined) for 2016, 2017, and 2018 respectively.
- The USA is recorded as having large exports of fresh/chilled SBT - 127.5t, 97.9t and 141.6t for 2016, 2017 and 2018 respectively. Due to the product being recorded as fresh SBT, this seems likely to be due to miscoding.
- For 2016 to 2018, the COMTRADE statistics record that small quantities of SBT were traded by EU Members, with a large export figure (376.5t⁴) recorded for 2016. These figures seem to indicate that species miscoding by EU Member States is continuing to occur.
- There are some medium to large SBT export figures unexpectedly recorded for Algeria, Iran, Oman and Sri Lanka (for Oman there is an import, export and re-export figure of 33t of fresh/chilled SBT recorded for 2017).

COMTRADE: Imports

Refer to Attachment G: Tables 2a and b

- For 2016 to 2018, COMTRADE statistics record that quantities of SBT were traded by EU Members, again appearing to indicate that species miscoding by EU Member States is continuing to occur.

³ This resulted in a saving of USD \$3,753.62

⁴ 375.1t of the 376.5t recorded for the Netherlands

- COMTRADE records Mauritius as having imported 1.6t and 2.0t of frozen SBT from China in 2016 and 2017 respectively, and this same information is reflected on the Mauritius Chamber of Commerce and Industry website. The Secretariat contacted Mauritius to confirm if this imported product was correctly coded as SBT and Mauritius advised that this product was not SBT and had likely been miscoded.
- There are some medium to large SBT import figures unexpectedly recorded for Cote d'Ivoire, Ghana, Malaysia, Oman (the 33t of fresh SBT imported into Oman in 2017 matches the 33t export and re-export figures of 33t recorded for Oman in Tables 1a and 1b), Thailand and the United Arab Emirates.

5. Recommendations

It is recommended that CC14:

- Notes the information presented in this paper.

Prepared by the Secretariat