



CCSBT-CC/2010/09 (Rev1)

Operation of CCSBT MCS Measures

1. INTRODUCTION

This document provides a summary of the operation of some of CCSBT's main Monitoring, Control and Surveillance (MCS) measures which have either not been discussed in other papers, or for which additional supplementary information is available.

The measures discussed here are:

- 1) The Catch Documentation Scheme (CDS),
- 2) The Transshipment Monitoring Program,
- 3) Records of Authorised Vessels and Farms,
- 4) The Vessel Monitoring System (VMS),
- 5) CCSBT IUU Vessel List, and
- 6) Minimum Standards for Inspections in Port.

2. CATCH DOCUMENTATION SCHEME (CDS)

CDS compliance issues have already been summarised in the Secretariat's Compliance with Measures report¹, and are not discussed further here. This section of the report only includes information on Non-Cooperating Non-Members (NCNMs) that are voluntarily cooperating with the CDS.

Cooperation with NCNMs: USA

The USA is not a Member of the CCSBT but continues to cooperate voluntarily with the CDS. The Secretariat received its first import submission from the USA in late April 2016 (for the 2015 year). CDS submissions from the USA continue to be received quarterly. Note that during 2017 the USA transitioned to a fully electronic trade data system and so expects that its trade reporting will have improved from 2018 onwards.

The USA provided feedback to the Secretariat that it has continued to see improved compliance among U.S. dealers with respect to SBT imports, and where issues have arisen, these were able to be corrected through direct outreach. The USA has also continued to see errors and omissions in CDS documentation accompanying SBT product entering the United States, particularly from Indonesia, and is committed to working with relevant CCSBT Member exporters to ensure that US importers receive appropriate documentation from these exporters.

¹ Paper CCSBT-CC/2010/04

3. TRANSHIPMENT MONITORING PROGRAMME

The CCSBT has a transshipment monitoring programme for monitoring the at-sea and in-port transshipment of SBT by its Members. The programme requires the CCSBT Secretariat to maintain an up-to-date Record of Authorised Carrier Vessels (CVs), as well as manage the supporting documentation such as deployment requests, transshipment declarations and observer reports.

Operational Issues

The Secretariat has observed the same main issues with operation of the Transshipment Resolution as in previous years which are difficulties with regard to:

- identifying SBT during multi-species transshipments, and
- ascertaining the species of tuna (specifically SBT) based solely on transshipment observer photographs. While it is essential to have observer photographs on record, it appears almost impossible to identify the species of tuna (especially when frozen, gilled and gutted) with absolute certainty based on photographs alone.

To address these operational issues it continues to be recommended that:

- SBT should be transhipped separate to other tuna-like species, in order to assist observers with identification, and
- Members and the Secretariat should monitor developments in the effectiveness and availability of practical on-site genetic testing kits (for tuna species identification) so that any such tools developed can be considered for use by transshipment observers in the future.

Authorised Carrier Vessels: IMO Number Requirement

IMO numbers have been provided for all currently authorised Carrier Vessels.

Summary of Transshipment Data Received

A summary of transshipment data provided to the Secretariat on transshipment declarations and/or observer reports/CDS forms for 2019 and the first half of 2020 (aggregated by flag and product type) is provided at **Attachment A** (Tables 1 - 5).

Tables 1, 2a/b and 3 of **Attachment A** provide information for all *at-sea* transshipment declarations and observer reports received. Table 4 provides the same information for *in-port* transshipment/ CDS information received. There is not yet any in-port transshipment data available for 2020 and so there is no data to include in Table 5 this year. Due to the COVID-19 pandemic during 2020, not all transshipment observer deployments that would usually be required under the Transshipment Resolution could occur due to port and travel restrictions. Therefore, Table 2 is presented in two parts for 2020:

- Part a – for those Carrier Vessels which did have a transshipment observer on board, and
- Part b – for those Carrier Vessels that didn't have a transshipment observer on board due to COVID-19 issues.

In Table 1 of **Attachment A** there appear to be large discrepancies between transshipment declaration weights of SBT versus observer reported weights. The reason for these discrepancies is because many observer reports have often not included the weight of SBT transhipped for each individual vessel (it has been requested they do so), but only the overall

weight of all SBT over a series of transhipments. This area of uncertainty is still being addressed.

The following summarises the information received by the Secretariat:

- Observer deployment requests specifying that SBT were to be transhipped were received for 86% of all known SBT transhipments at sea during 2019;
- Observer deployment requests specifying that SBT were to be transhipped have been received for 92% of all known SBT transhipments at sea during the first half of 2020;
- The Secretariat received 66 transhipment declarations for transhipments at sea totalling 2,579t during 2019 and has received 12 transhipment declarations totalling 290t for the first half of 2020;
- The Secretariat received 12 transhipment declarations for in-port transhipments totalling 586t during 2019, and to date has received no transhipment declarations for in-port transhipments that occurred during the first half of 2020. It is not yet possible to check whether any additional in-port transhipments occurred, because CMFs for the 2nd quarter of 2020 are not due to be submitted to the Secretariat until 30 September 2020;
- Observer reports have been received for 100% of all known 2019 transhipments at sea. Of the observer reports received, 30% contained observer estimates of the weights of SBT transhipped, while the remaining 70% did not provide specific information on SBT weights;
- Observers observed 6 (50%) of at-sea transhipments that occurred during the first half of 2020, leaving 6 at-sea transhipments of SBT that were not observed due to COVID-19 issues in deploying transhipment observers to Carrier Vessels; and
- Table 3 of **Attachment A** provides a summary of transhipment weights recorded on transhipment declarations, observer reports, and CDS information for the 2019 calendar year. To enable valid comparisons to be made, this table presents data for only those transhipments for which the Secretariat has received both transhipment declarations and observer reports and has been able to match these transhipments with CDS documents. When summed, the weights of transhipped SBT reported on transhipment declarations versus CDS documents differed from each other by 0.03%.

4. RECORDS OF AUTHORISED VESSELS AND FARMS

Authorised Farm and Vessel Records/ CLAV

The Secretariat continues to receive authorised farm and vessel updates approximately twice a week, with vessel updates containing up to one hundred vessels. Upon receipt of this information, the Secretariat updates its authorised vessels/farms database as well as the CCSBT web site. Note that there have been issues with updated vessel authorisation information not being received promptly as required. This issue is discussed in more detail in paper CCSBT-CC/2010/04.

Updated vessel information continues to be shared with the joint tuna Regional Fisheries Management Organisations' (RFMOs') Consolidated List of Authorised Vessels (CLAV) through automated updates between the CCSBT and the CLAV which occur daily. However, no maintenance of the CLAV has been conducted since funding ceased in October 2019. As of April 2020, about 200 potential duplicate records were detected in the CLAV and a similar number of error messages were occurring during automatic uploads. In addition, "page not found" errors are being generated for all CCSBT vessel records when attempting to

find the CCSBT source information for these vessels, and vessel types are not being updated to match associated changes on the CCSBT's record of authorised vessels.

It is expected that the quality of the data in the CLAV and its usability will continue to decline in the absence of ongoing maintenance. The CCSBT Secretariat will continue to maintain the quality of its own data and will cooperate in any discussions between the tuna RFMOs and FAO to find an effective solution for ongoing CLAV maintenance.

Authorised Fishing Vessels: IMO Number Requirement

In October 2015, CCSBT 22 revised its 'Resolution on a CCSBT Record of Vessels Authorised to Fish for Southern Bluefin Tuna', to require that all CCSBT-authorised fishing vessels (except wooden and fibreglass vessels) of at least 100GT/GRT in size have IMO² numbers issued to them effective from 1 January 2017.

Currently there is 100% compliance with this requirement. All fishing vessels that were authorised between 1 July 2019 to 30 June 2020 either had IMO numbers or alternatively the Secretariat was advised that vessels were exempt from having IMO numbers because they were either less than 100 GT/GRT in size or had a wooden/fibreglass hull construction.

In December 2017 the IMO's numbering scheme was revised to allow for IMO numbers to be issued for a wider range of vessel types, and CCSBT 26 updated its Authorised Vessel Resolution to incorporate these changes³ in October 2019 as follows:

3. Members and Cooperating Non-members shall ensure that the following categories of fishing vessels in the CCSBT Record of Authorised Vessels have IMO numbers issued to them:

- *all fishing vessels (except wooden and fibreglass vessels) flying their flag that are authorised to catch SBT, and that are at least 100 gross tonnage in size, and*
- *effective from 1 January 2021, wooden and fibreglass fishing vessels flying their flag that are authorised to catch SBT, and that are at least 100 gross tonnage in size, and*
- *effective from 1 January 2022, all motorised inboard fishing vessels of less than 100 gross tonnage down to a size limit of 12 metres in length overall (LOA) authorised to operate outside waters under the national jurisdiction of the flag State.*

The Secretariat will report back on compliance with the 1 January 2021 requirements of paragraph 3 above during 2021.

5. VESSEL MONITORING SYSTEM (VMS)

There is no new information to consider in relation to VMS.

6. CCSBT IUU VESSEL LIST

In October 2019, CCSBT's IUU Vessel List was revised to include a provision to cross-list vessels from the IUU Lists of eight other RFMOs onto the CCSBT's IUU Vessel List, but only in cases where the RFMO concerned was the original IUU listing organisation.

² International Maritime Organisation

³ Paragraph 3 of the, "[Resolution on a CCSBT Record of Vessels Authorised to Fish for Southern Bluefin Tuna](#)"

The eight RFMOs the CCSBT agreed to cross-list vessels from are the Inter-American Tropical Tuna Commission (IATTC), the International Commission for the Conservation of Atlantic Tunas (ICCAT), the Indian Ocean Tuna Commission (IOTC), the Western and Central Pacific Fisheries Commission (WCPFC), the Commission for the Conservation of Antarctic Marine Living Resources (CCAMLR), the South East Atlantic Fisheries Organisation (SEAFO), the Southern Indian Ocean Fisheries Agreement (SIOFA) and the South Pacific Regional Fisheries Management Organisation (SPRFMO).

At the time of adopting this cross-listing provision there were no vessels on the CCSBT's own IUU Vessel List. In late 2019 and early 2020, the Secretariat collated a CCSBT IUU List consisting of all appropriate IUU-listed vessels from the eight nominated RFMOs. This initial CCSBT IUU List included 116 cross-listed vessels and was first posted on the CCSBT's website in February 2020. That list has not yet been updated.

7. MINIMUM STANDARDS FOR INSPECTIONS IN PORT

The Resolution for a CCSBT Scheme for Minimum Standards for Inspection in Port was adopted in 2015 and came into effect from 1 January 2017 and includes a number of obligations for Port State Members.

Designated Points of Contact and Ports

The Resolution requires that each Member wishing to grant port access to 'foreign fishing vessels' (including carrier vessels other than container vessels) carrying SBT or fish products originating from SBT submits to the CCSBT Secretariat:

- A designated point of contact for receiving inspection reports, and
- A list of designated ports to which 'foreign fishing vessels' may request entry.

The Secretariat has received designated points of contact and a list of designated ports from all Members except Indonesia. Indonesia advised that the Resolution is not currently applicable to it since:

"..... for the time being there is no foreign fishing fleet is allowed to enter Indonesian port to tranship SBT.

Indonesia is on the progress to finalize relevant regulations on PSM Implementation after we ratified the PSM agreement in 2016 and will inform CCSBT once the said regulation is issued including the new designated fishing ports for PSM Implementation in Indonesia".

Port Inspection Reports

In addition, paragraph 15 of the Resolution requires that:

- 15. Each year Members shall inspect at least 5 % of landing and transshipment operations in their designated ports as are made by foreign fishing vessels.*

Further, paragraph 20 specifies that:

- 20. The port Member shall transmit a copy of the inspection report to the CCSBT Secretariat no later than 14 days following the date of completion of the inspection. If the inspection report cannot be transmitted within 14 days, the port Member should notify the CCSBT Secretariat within the 14 day time period the reasons for the delay and when the report will be submitted.*

Table 1 outlines the Secretariat's interpretation of the number of inspections that need to be conducted to meet the 'at least 5%' port inspection requirement.

Table 1: Number of Required Inspections (to meet the ‘at least 5%’ inspection requirement)

Number of landing/ transshipment operations occurring in designated ports	Number of inspections required by Members to meet the requirements of paragraph 15, “at least 5% of landing and transshipment operations in their designated ports as are made by foreign fishing vessels”
1 – 20	1 ⁴
21 – 40	2
41 – 60	3
61 – 80	4
81 – 100	5

For the 2019 calendar year Japan, Korea, Taiwan and South Africa submitted relevant port inspection reports to the Secretariat. Table 2 provides a summary of the port inspection reports that were submitted for vessels carrying SBT/SBT products, how many reports were submitted within the required 14-day period, whether appropriate notifications were received for any reports that were submitted late or have not yet been submitted and whether the inspection target appears to have been met.

Table 2: Number of 2019 Port Inspection Reports Submitted to the Secretariat

Member	Total No. of Landing/ Transshipment Operations by ‘Foreign Fishing Vessels’ ⁵	Number of Inspection Reports Received for ‘Foreign Fishing Vessels’ (carrying SBT/SBT products)	Percentage of Inspection Reports Received within the Required 14-Day Timeframe	Number of Notifications Received that Inspection Reports would be Submitted Late	Was the ‘at least 5%’ inspection requirement met? ⁶
Japan	7	1	100%	Not applicable	Yes
Korea	3	1	100%	Not applicable	Yes
South Africa	19	12 ⁷	0%	0	Yes
Taiwan	4	4	0% ⁸	0	Yes

In summary:

- From the data available, Japan, Korea, South Africa and Taiwan exceeded the ‘at least 5%’ inspection target in 2019;
- Compliance with the 14-day timeframe for submitting inspection reports to the Secretariat was limited - only Japan and Korea provided inspection reports to the CCSBT Secretariat within the required timeframe; and
- South Africa and Taiwan provided inspection reports late and without any required pre-notification of the reason for the delay in providing the inspection reports.

Prepared by the Secretariat

⁴ Inspecting no (0) landing and transshipment operations out of 1-20 operations, would mean that 0% were inspected and the minimum threshold of ‘at least 5%’ would not be met

⁵ As provided in Members’ annual reports to the CC/EC

⁶ Based on the port inspection data received by the Secretariat

⁷ The Secretariat has only received copies of 12 relevant inspection reports from South Africa, but South Africa’s annual report to CC/EC records that 19 relevant port inspections were conducted; the Secretariat will follow up with South Africa regarding the 7 missing port inspection reports

⁸ Taiwan advised that due to a misunderstanding of the Resolution it submitted its inspection reports after the due date

Attachment A

Table 1: Summary of Transhipments at sea during the 2019 Calendar Year

Fishing Vessel Flag	From Transhipment Declarations			From Observer Reports	
	Number of Transhipments	Total Net Weight (kg) of SBT	Product Type	Number of Transhipments	Total Net Weight (kg) of SBT
Japan	33	1,696,084	GG	33	1,051,337
Korea	6	560,434	GG	6	41,590
Taiwan	27	322,880	GG	27	-
TOTAL	66	2,579,398		66	1,092,927

Table 2a: Summary of Transhipments at sea during the first half of the 2020 Calendar Year (transhipment observer on board)

Fishing Vessel Flag	From Transhipment Declarations			From Observer Reports ⁹	
	Number of Transhipments	Total Net Weight (kg) of SBT	Product Type	Number of Transhipments	Total Net Weight (kg) of SBT
Japan	5	184,871	GG	-	-
Taiwan	1	995	GG	1	-
TOTAL	6	185,866		1	-

Table 2b: Summary of Transhipments at sea during the first half of the 2020 Calendar Year (no transhipment observer aboard due to COVID-19 circumstances)

Fishing Vessel Flag	From Transhipment Declarations		
	Number of Transhipments	Total Net Weight (kg) of SBT	Product Type
Japan	1	69,017	GG
Taiwan	5	35,093	GG
TOTAL	6	104,110	

⁹ Not all observer reports for the first half of 2020 are available yet as they are not received until some time after the Observer has disembarked from the Carrier Vessel

Attachment A

Table 3: Summary of Transhipments at sea versus CDS Forms versus Observer Reports for the 2019 Calendar Year¹⁰

Fishing Vessel Flag	Comment	Number of Transhipments	Total Net Weight (kg) from Transhipment Declaration	Total Net Weight (kg) from CDS	Total Net Weight (kg) from Observer Report
Japan	Observer provided SBT weights	19	1,050,324	1,050,324	1,051,337
Korea	Observer provided SBT weights	1	40,935	40,935	41,590
Japan	Observer provided no SBT weights	14	645,760	645,247	Weight not provided
Korea	Observer provided no SBT weights	5	519,499	519,499	Weight not provided
Taiwan	Observer provided no SBT weights	26	319,010	318,730	Weight not provided
TOTAL		65	2,575,528	2,574,735	1,092,927

Table 4: Summary of Transhipments that occurred in port during the 2019 Calendar Year¹¹

Fishing Vessel Flag	From Transhipment Declarations			From CDS		
	Number of Transhipments	Total Net Weight (kg) of SBT	Product Type	Number of Transhipments	Total Net Weight (kg) of SBT	Product Type
Japan	4	146,596	GG	4	146,596	GGT
Korea	4	437,239	GG	4	436,439	GGT
Taiwan	4	2,299	GG	4	2,299	GGT
TOTAL	12	586,134		12	585,334	

Table 5: Summary of Transhipments that occurred in port during the first half of the 2020 Calendar Year¹¹

None: No in-port transhipments have been recorded for this period yet.

¹⁰ This report is limited to transhipments where observer reports have been provided, and where the Secretariat has been able to match CDS information

¹¹ Transhipments conducted in port are not part of the CCSBT Transhipment Regional Observer Program, and therefore no observer deployment requests nor observer reports are required to be submitted for these transhipments. Only Transhipment Declarations are required to be submitted.