



Operation of CCSBT MCS Measures

Introduction

This document provides a brief summary of the operation of the main four CCSBT Monitoring, Control and Surveillance (MCS) measures from the Secretariat's perspective. For each measure, the Secretariat's interaction with that measure is outlined, and where relevant, issues that the Secretariat is aware of in the operation of the measure and any recommendations for changes to the measure.

(1) Catch Documentation Scheme (CDS)

Secretariat Interaction

The Secretariat is responsible for:

- receiving and processing¹ all CDS documents,
- checking the completeness and accuracy of these documents,
- conducting reconciliations between the different types of CDS forms and between copies of forms provided by exporters and importers,
- following-up with Members/Cooperating Non-members (CNMs) regarding discrepancies and missing information,
- managing validation details submitted by Members/CNMs
- producing 6 monthly CDS reports,
- maintaining and enhancing the CDS database, and
- coordinating the purchase of centralised tags for use with the CDS.

Electronic CDS (e-CDS)

A significant proportion of CDS information is already provided electronically and consequently the Secretariat's data entry costs for the CDS are small (less than \$8,000 in 2011). The most time-consuming components of the CDS for the Secretariat are reconciliations and following-up and resolving any discrepancies and missing information with Members/CNMs.

These components of the CDS operation could be made more efficient (for both Members and the Secretariat) with a web based e-CDS. A web based e-CDS would impose rules on completion of forms and therefore prevent many of the mistakes and missing information that can occur with the current system. This in turn would reduce the effort required by Members and the Secretariat in following up on such issues. A web based e-CDS would also result in more timely availability of CDS information.

¹ Loading all electronic documents received (all Catch Tagging Forms from all Members and all Catch Monitoring Forms & Re-Export/Export after landing of Domestic Product forms from Australia) to the database, and data entry of all paper documents received (all other forms).

The CDS has matured sufficiently for a move to an e-CDS to be feasible. Therefore, it is now appropriate for Members to consider whether they wish to invest in such a move in the foreseeable future.

Recommendations

Implementation of a web-based e-CDS is likely to be expensive. From the Secretariat's knowledge of systems development, an e-CDS system would be expected to cost well over \$100,000 to develop. There would also be an annual maintenance expense that would be highest in the first few years as the system was refined.

If members are interested in a web-based e-CDS given this likely minimum expenditure, then they could consider asking the Secretariat to investigate expected costs, benefits and risks of implementing a CCSBT e-CDS in terms of overall cost, administration, and SBT management, for consideration by the Compliance Committee meeting in 2013. This would be a major item of work for the Secretariat because full specifications would need to be developed.

Operational Issues

The following are the main CDS issues that the Secretariat has observed since the Sixth meeting of the Compliance Committee (CC6). The Secretariat has worked with relevant Members/CNMs to resolve these issues where possible/ practicable.

1. Late Submission of CDS Documentation

CDS documentation for the 2011 year continued to be received later than the agreed timeframes, with some Catch Monitoring Forms (CMFs) and catch tagging information not being received until well after the final quarterly deadline of 31 March 2012 (for 2011 data). Any time delay in receiving data submissions makes some CDS tasks difficult or impossible to carry out in a timely manner. For example, late submissions may delay the commencement of reconciliation work and/or negatively impact on reconciliation results. Late submissions may also affect the completeness of information that can be provided in the Secretariat's six-monthly CDS reports.

2. Tagging Data Mismatches

Many tagging data mismatches or missing sets of tagging data were found during the reconciliation process for 2011 CDS data. Mismatches generally occurred due to one of the following three situations:

- i) some tagging data which should have been submitted as part of the Excel spreadsheet quarterly submission of tagging data were missing, or
- ii) an incorrect or incomplete list of Catch Tagging Form (CTF) numbers was recorded on the CMF, or
- iii) the electronically submitted spreadsheets of catch tagging data contained errors such as referencing an incorrect CMF number.

3. CMFs which included Fishing Vessels that were not Authorised while Fishing

This issue most commonly applied to Indonesian CMFs and vessels. The percentage of Indonesian CMFs for domestic landings that included authorised vessels in 2010 was 91%, but improved to 100% in 2011. However, the percentage of Indonesian CMFs for exports that included authorised vessels was 77% in 2010, but declined to 58.4% in 2011.

4. South Africa Reported Several Fraudulent Forms

Reconciliation of the 2011 South African data revealed three CMFs which had been issued by a company with no authority to issue CMFs, and that had also been validated by unauthorised validators. These forms were considered by South Africa to be fraudulent. At the time, South Africa advised the Secretariat that the outcome of their internal investigation into this matter would be reported to CCSBT, however this information is not yet available.

5. Fish Weight/Number Differing Between Exporter and Importer Copies of a CMF

There were more than 25 CMFs where the weight and/or number of fish on the exporter copy of the CMF differed to the weight and/or number of fish recorded on the importer copy.

6. CMFs were Received where Both Export and Landing of Domestic Product Sections had been Filled Out

For many Taiwanese CMFs that were submitted for both the 2010 and 2011 year, it was not possible to determine whether the CMF submitted represented a landing of domestic product or an export. This was because both sections had been filled out on the form, and the export and domestic landing tick boxes were often both selected. Taiwan has advised that issues such as these are being addressed through an on-going education process, and have worked with the Secretariat to resolve this matter for 2010 and 2011 CMFs.

7. Importer Data Missing

There were many cases where the Secretariat did not receive copies of the CMF from the final import destination state/entity, even though the export destination (on the exporter copy of the CMF) was recorded as a Member or CNM.

In addition, the following issues were commonly noted on importer copies of CMFs:

- i) the import city and/or import date were not provided, and
- ii) importers had not signed the final destination section of the CMF.

8. Mismatching Page Numbers and Duplicate Form Numbers

CMFs from Indonesia are currently received as two page documents. There were a number of CMF documents received from Indonesia where the first and second page numbers were different, but they appeared to belong to the same CMF. The possibility of issues like this occurring would be reduced if all CMF information was recorded on a single page such as in the CMF adopted in the CDS Resolution.

There were also a number of Indonesian CMFs that had duplicate or triplicate form numbers, *i.e.* CMFs were received that had the same CMF number but contained different information.

9. Data Provided in Languages other than English or Japanese

On many Taiwanese CMFs, fishing vessel master information was initially either not filled out in the transshipment section of CMFs, or was provided in a language other than English or Japanese. In addition, in the domestic landing section, buyer information was sometimes either not provided or was provided in a language other than English or Japanese. Taiwan has been working with the Secretariat to provide translations and missing names where appropriate, and the majority of these issues to date have now been resolved.

The following issues were reported to CC6 and have shown improvement since that meeting:

1. South African Tagging Data

South Africa submitted tagging data during 2010 and the first half of 2011 which was not in the standard format and didn't allow for individual tagged fish to be matched to a specific CMF. This problem has been recognised and subsequently corrected by South Africa.

2. Destination Field Not Completed in the Export Section of CMFs

There were a number of cases where the export destination field was not completed for CMFs for export documents. This issue has improved in 2011, and there are now approximately 50% less 2011 CMFs containing no export destination than there were in 2010.

Recommendations for Changes to the CDS Resolution

The following changes to the CDS resolution are suggested or recommended by the Secretariat (Attachment A contains the specific recommended changes to the resolution):

1. The CDS Resolution specifies that the information posted to the public area of the CCSBT web site should include, "Net weight", but not "Estimated whole weight". Since processed state is not included in the information posted to the web site, net weight is of little use. It is recommended that the resolution be modified to include estimated whole weight in the information that is posted to the web site.
2. Japan is experiencing problems with physically storing CDS documents (particularly Catch Tagging Forms) as is required in accordance with paragraph 6.1 of the CDS Resolution. It is recommended that this paragraph be amended to allow storage of scanned electronic copies instead of only the original documents.
3. Three CDS form types (CMF, REEF and CTF) as well as the Six Monthly CDS Reports refer to up to five different Product Types: Round (RD), Gilled and Guttled (GG), Dressed (DR), Fillet (FL²), or Other (OT²). However, no description or definitions of these different product types are provided in the CDS.

Agreed definitions of product types are necessary for applying appropriate conversion factors within the CDS so that importers can appropriately verify CDS documentation provided by exporters. Furthermore, to improve the accuracy of the information and to allow best use of conversion factors, it would be useful to split each of the GG and DR product types into two additional types. It is therefore recommended that the CDS be modified to include the following classification and definitions:

Code	Name	Description
RD	Round	SBT without any processing.
GGO	Gilled and gutted – tail on	Processed with gills and gut removed. <i>Operculae (gill plates/covers) and dorsal, pelvic and anal fins may or may not be removed.</i>
GGT	Gilled and gutted – tail off	Processed with gills, gut and tail removed. <i>Operculae (gill plates/covers) and dorsal, pelvic and anal fins may or may not be removed.</i>
DRO	Dressed – tail on	Processed with gills, gut, operculae (gill plates/covers) and head removed. <i>Dorsal, pelvic and anal fins may or may not be removed.</i>
DRT	Dressed – tail off	Processed with gills, gut, operculae (gill plates/covers), head and tail removed. <i>Dorsal, pelvic and anal fins may or may not be removed.</i>
FL	Fillet	Processed further than DRT, with the trunk cut into fillets.
OT	Other	None of the above.

² Does not apply to CTF forms.

A distinction between “Dressed” and “Gilled and Gutted” product in this classification is that “Dressed” product has the head and operculae removed whereas “Gilled and Gutted” has the head on and the operculae may or may not be removed. Some Australian product that is currently called gilled and gutted (head off/tail on) would be classified as “DRO” in this classification.

4. When a product type of “Other” (OT) is used, the CDS forms specify that a conversion factor should be provided. However, the corresponding instruction sheets for the forms do not mention that a conversion factor should be provided. It is recommended that the instructions be modified to include this requirement.
5. In the CDS Resolution there is no clear definition of ‘Exporter’ and who can provide a name and signature for this field, whereas much clearer definitions are provided specifying who can fill out the ‘Validation by Authority’ and ‘Certification by Importer’ sections. It would be useful if clearer, more specific guidelines are provided in the CMF and Re-export form instruction sheets regarding the type of individual who can sign as ‘Exporter’. It’s also possible that some exporting individuals may not have a licence number or company name, and instructions should be added to explain how the exporter should fill out the form in these cases.
6. For Catch Tagging Forms, the instruction sheet does not include guidelines clarifying at which point fork length should be measured. It would be useful if a diagram and specific instructions could be provided, including noting that this measurement should be made before freezing and tail removal.

(2) Transshipment at Sea Monitoring Program

Secretariat Interaction

The Secretariat maintains a record of carrier vessels authorised to receive transshipments at-sea. On receipt of updates, the Secretariat updates its internal database of authorised carrier vessels and the CCSBT web site. For transshipments involving SBT, the Secretariat receives and maintains records for observer deployment requests, transshipment declarations and observer reports from the IOTC and ICCAT Secretariats.

In relation to the information received by the Secretariat:

- Observer deployment requests specifying that SBT was to be transhipped were received for approximately 85% of the SBT transshipments in 2011. This situation has improved for transshipments that took place during the first half of 2012, with 100% of SBT transshipments having correct observer deployment requests provided in advance of the transshipment. This improvement corresponds to the continued request from the Compliance Committee for improved notification of transshipments involving SBT from Members and CNMs. It is important to maintain this improvement because correct observer deployment requests are an important part of the effective operation of this program.
- The Secretariat received 55 transshipment declarations for transshipments totalling 543t during 2011.
- Observer reports were received for 78% of 2011 transshipments. Of the reports received, approximately 84% contained estimates for weights of SBT transhipped, while the remaining 16% did not provide specific information on SBT³.

³ This was generally due to the observer being unable to separately identify SBT during transfer to the carrier vessel.

- The Secretariat is working with IOTC and ICCAT to obtain outstanding observer reports in relation to the received transshipment declarations.
- A summary of transshipments according to transshipment declarations and observer reports, aggregated by flag and product type, during 2011 and the first half of 2012 (until 30 June 2012) is provided at Attachment B (Tables 1 and 2). The Secretariat has not provided this summary on a vessel by vessel basis for confidentiality reasons, but has this information available if it is required by the Compliance Committee. These tables provide information for all transshipment declarations, but in some cases the observer reports have not yet been received. This is the main reason for the large discrepancies between transshipment declarations and observer reported weights reported in Tables 1 and 2.
- Table 3 of Attachment B provides a summary of transshipment weights according to transshipment declarations, observer reports, and CDS information. To enable valid comparisons, this table is restricted to only those transshipments for which the Secretariat has received both transshipment declarations and Observer reports, and has also been able to match these transshipments with CDS documents. The weights of transhipped SBT reported from these three sources differed from each other by no more than 3.3%.

Operational Issues

The Secretariat has observed one main issue with operation of the transshipment Resolution since the Sixth meeting of the Compliance Committee (CC6):

1. Observers are often unable to separate species during transshipments. This is usually due to the fish being transhipped in frozen ‘strings’ containing a mix of species and also due to the speed of these transfers. These two factors often result in the observer report recording ‘Mixed Tuna Species’. Where observers can separate SBT, they most commonly use one of two methods to identify SBT and estimate weights. Both of these methods rely on information provided by the fishing vessel:
 - Identify SBT by the presence of CCSBT tags that have been inserted by the fishing vessel;
 - Where SBT can be visibly identified in a transfer (often using the above method), observers commonly use an average weight, multiplied by the estimated number, to calculate a total weight. The average weight is generally calculated using weights and numbers of fish provided by the fishing vessel.

This situation has not improved significantly during 2011 or 2012 despite a request by the CCSBT Compliance Committee in 2010 that SBT should be transhipped separate to other tuna-like species where possible, in order to assist observers with identification.

Recommendations

The Secretariat has no recommendations for change, but would like to emphasise the request made by the CCSBT Compliance Committee in 2010 that where possible, SBT should be transhipped separate to other tuna-like species, in order to assist observers with identification.

(3) Vessel Monitoring System (VMS)

Secretariat Interaction

The Secretariat has no interaction with Members’ Vessel Monitoring Systems.

(4) Records of Authorised Vessels and Farms

Secretariat Interaction

The Secretariat receives updates to authorised farms and vessels approximately twice a week, with vessel updates containing from one to hundreds of vessels. On receipt of this information, the Secretariat updates its internal database of authorised vessels/farms as well as the CCSBT web site. Updated information is also shared with the joint tuna RFMOs' consolidated list of authorised vessels.

During 2012, the standard template for reporting farm authorisations was revised to more accurately align with the format used by Australia⁴. It was also updated on the CCSBT website.

Operational Issues

The following are the main issues with the operation of the authorised vessel/farm resolutions that the Secretariat has observed since the Sixth meeting of the Compliance Committee (CC6):

1. There are some instances where vessels caught SBT and were not authorised at the time. See CCSBT–CC/1209/04 for details.
2. Some Members/CNMs had periods of non-authorisation for their vessels. This situation occurred when current vessel authorisations had expired, and revised authorisation information had not been provided prior to the expiry date. In these types of cases, back-dated authorisations are often provided. However, this may mean that there was a period during which vessels were not authorised to fish for SBT.

Recommendations

There are no recommendations for change, but the Secretariat would like to note that, wherever possible, it is important that vessel authorisation renewals are submitted prior to current authorisations expiring.

⁴ Australia is currently the only Member/CNM with active farming operations

Recommended Changes to the CDS Resolution

Where practical, recommended changes to relevant parts of the CDS resolution are shown in tracked mode below.

1. Add Estimated Whole Weight to the data on the CCSBT Web Site

- 6.4 The Executive Secretary will post on the public area of the CCSBT web site a subset of the report comprising:
- Flag State/fishing entity;
 - Harvest year;
 - Product destination (including landings of domestic product);
 - Gear code;
 - Net weight;
 - Estimated whole weight (calculated by applying a conversion factor to the net weight).

2. Allow storage of scanned electronic copies instead of original CDS documents

- 6.1 Members, Cooperating Non-Members and OSECs shall retain all original CCSBT CDS Documents (or scanned electronic copies of the original documents) received by them. Members, Cooperating Non-Members and OSECs shall also retain a copy of any CCSBT CDS Documents issued by them. Copies of these CDS Documents (except the Catch Tagging Form⁵) shall be forwarded⁶ to the Executive Secretary on a quarterly basis.

3. / 4. Revised classification of product types, including definitions, and a direction to provide a Conversion Factor for OT

The definition of “Type: ...” in the instructions of the CMF, REEF and CTF forms should be replaced with:

“Type: Enter the type code from the table below that most closely matches the type of the SBT. For OT, describe the type of product, and specify a conversion factor.”

Code	Name	Description
RD	Round	SBT without any processing.
GGO	Gilled and gutted – tail on	Processed with gills and gut removed. <i>Operculae (gill plates/covers) and dorsal, pelvic and anal fins may or may not be removed.</i>
GGT	Gilled and gutted – tail off	Processed with gills, gut and tail removed. <i>Operculae (gill plates/covers) and dorsal, pelvic and anal fins may or may not be removed.</i>
DRO	Dressed – tail on	Processed with gills, gut, operculae (gill plates/covers) and head removed. <i>Dorsal, pelvic and anal fins may or may not be removed.</i>
DRT	Dressed – tail off	Processed with gills, gut, operculae (gill plates/covers), head and tail removed. <i>Dorsal, pelvic and anal fins may or may not be removed.</i>
FL	Fillet	Processed further than DRT, with the trunk cut into fillets.
OT	Other	None of the above.

⁵ Requirements to provide information in the Catch Tagging Form are set out in 4.3

⁶ Either as a copy of the original form or in electronic format containing all the information in the forms

However, for the CTF form, the last two rows of the table should be omitted. In addition, for REEF forms, “Type” appears in two places in the instructions. In the first location, the definition should be changed in accordance with the above, but in the second location, the definition should be changed to:

“Type: Enter the type code from the table of ‘Types’ in the previous section of these instructions that most closely matches the type of the SBT. For OT, describe the type of product, and specify a conversion factor.”

The CMF, REEF and CTF forms themselves and Appendix 3 of the CDS Resolution also need to be changed by replacing all occurrences of the codes “.../GG/DR/...” with “.../GGO/GGT/DRO/DRT/...”

The text in paragraph 1 of Appendix 2 of the CDS resolution should be changed as follows: “..., removing fins, gill plates operculae (gill plates/covers) -and tail ...”

5. Certification by Exporter

A footnote should be added to the “Certification by Exporter” instructions for CMF and REEF forms clarifying the individual who can certify forms as “Exporter”, as well specifying what to do in cases where the exporter may not have a licence number or company name.

The instruction sheet section on certification by exporter should be amended as follows:

“Certification by Exporter: The Exporter^{footnote} must provide his/her name, signature, date (dd/mm/yyyy) and either the exporter license number or the exporter company name to certify the information provided in relation to the export shipment (i.e. that the form correctly records what is being exported). If the exporter does not have a licence number or exporter company name, then they should write their own name in this field.”

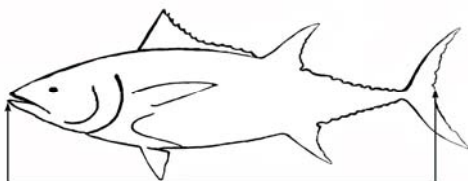
Associated footnote:

The individual certifying as “Exporter” must be an appropriate authority approved by the exporting company to make this declaration on the company’s behalf, but it must not be the same individual as the authority validating the export.

6. Measurement of Fork Length (Catch Tagging Form)

The following note should be added into the Instruction Sheet for Catch Tagging Forms under the Catch Section – Tag Information:

“Fork length (cm): Enter the fork length of the fish rounded to the nearest whole centimetre. Measure the straight line horizontal (not curved over body) length of the fish from the closed mouth to the fork of the tail before freezing and tailing as show in the diagram below.”



(Note that the above diagram can be edited to make it clearer if this recommendation is accepted)

Table 1: Summary of Transhipments at sea during the 2011 Calendar Year

Fishing Vessel Flag	From Transhipment Declarations			From Observer Reports	
	Number of Transhipments	Total Weight (kg) of SBT	Product Type	Number of Transhipments	Total Weight (kg) of SBT
Japan	21	309,355	GG	18	238,648
Korea	3	57,676	GG	2	15,150
Taiwan	30	174,740	GG	23	101,409
Philippines	1	846	GG	-	-
TOTAL	55	542,617		43	355,207

Table 2: Summary of Transhipments at sea during the first half of the 2012 Calendar Year

Fishing Vessel Flag	From Transhipment Declarations			From Observer Reports	
	Number of Transhipments	Total Weight (kg) of SBT	Product Type	Number of Transhipments	Total Weight (kg) of SBT
Japan	3	75,695	GG	3	74,162
Taiwan	2	21,343	GG	1	4,880
TOTAL	5	97,038		4	79,042

Table 3: Summary of Transhipments at sea versus CDS Forms versus Observer Reports⁷

Fishing Vessel Flag	Number of Transhipments	Total Weight (kg) from Transhipment Declaration	Total Weight (kg) from CDS	Total Weight (kg) from Observer Report
Japan	10	111,512	110,146	113,125
Taiwan	15	102,309	103,902	100,409
Japan	1	5,637	5,637	Report provided, but no weights specified
Taiwan	6	17,031	17,031	Reports provided, but no weights specified
TOTAL	32	236,489	236,716	

⁷ This report is limited to transhipments where observer reports have been provided, and where the Secretariat has been able to match CDS information