



CCSBT-EC/1310/15

Relationship with Non-members

Purpose

To provide an update concerning discussion or issues with Non-Member and Non-CNM (Cooperating Non-Member) States/Entities.

Identification of States that have or are likely to become important port or market States for SBT, for consideration at CCSBT 20

CCSBT 18 agreed that the following process would be used for nominating States that have or are likely to become important port or market States for SBT:

- Members nominate important States whose cooperation is desired, together with background information supporting that nomination and provide this information to the Executive Secretary at least 6 weeks in advance of the Annual Meeting.
- The Executive Secretary incorporates this information in the Secretariat's agenda paper for the standing agenda item on "Relationship with Non-Members" for consideration by the Extended Commission.
- With the Extended Commission's endorsement, the Executive Secretary write to the nominated State(s) seeking their cooperation.
- The nominating Member follow-up the Executive Secretary's letter with bilateral discussion. This is an important step because experience has shown that many States do not respond to written communication.

No nominations have been provided to the Secretariat in advance of CCSBT 20.

Progress on issues raised at CC 7 and CCSBT 19

At the Seventh meeting of the Compliance Committee (CC 7), it was agreed that the Executive Secretary would write to market entities identified in the Secretariat's review of trade data (in particular, the USA, Hong Kong, China and Singapore) and invite them to participate as observers at the next meeting of the Compliance Committee. The Secretariat wrote to the USA, China and Singapore on 10 December 2012 and to Hong Kong on 4 March. These letters are provided at Attachments A to D respectively. Reminders were sent in mid August 2013.

At the time of preparing this paper:

- no response had been received from China;
- Hong Kong advised that it would not attend the meeting but wished to assure the CCSBT that it recognised the importance of the conservation of marine resources, and will continue to strengthen its effort in promoting the conservation and sustainable use of the marine environment;

- Singapore advised that it wished to accept the invitation and that it was willing to cooperate with CCSBT's Catch Documentation Scheme; and
- the USA advised that it will attend both the Compliance Committee and CCSBT 20¹.

Prepared by the Secretariat

¹ The USA has applied for and been granted observer status to attend CCSBT 20 as agreed at CCSBT 19.

Prepared by the Secretariat

Commission for the Conservation of
Southern Bluefin Tuna



みなみまぐろ保存委員会

Erika Carlsen
NOAA Fisheries
Office of International Affairs
Silver Spring, MD 20910
301.427.8358

10 December 2012

Dear Dr Carlsen,

The Commission for the Conservation of Southern Bluefin Tuna (CCSBT) has recognised that the expansion of markets for Southern Bluefin Tuna (SBT) is a compliance risk for the SBT fishery because it provides a potential avenue for marketing SBT that are caught outside of the CCSBT's conservation and management measures framework.

Consequently, the CCSBT has commenced monitoring the expansion of SBT markets and it is seeking the cooperation of States and Entities with emerging markets for SBT.

At the October 2012 meeting of the CCSBT's Compliance Committee, the CCSBT noted the growing importance of the USA as a market for SBT.

To enhance cooperation between the USA and the CCSBT, the CCSBT extends an invitation for the USA to participate as an observer at the next meeting of the CCSBT's Compliance Committee. This meeting will be held in Adelaide, Australia, from 10-12 October 2013. I hope that the USA will be able to send a representative to the meeting. I will send further details to you closer to the date of the meeting.

Yours sincerely,

Robert Kennedy
Executive Secretary

Commission for the Conservation of
Southern Bluefin Tuna



みなみまぐろ保存委員会

Mr Xiaobing Liu
Director, Division of International Cooperation
Bureau of Fisheries
Ministry of Agriculture
No. 11 Nongzhanguan Nanli
Beijing 100026
CHINA

10 December 2012

Dear Mr Liu,

The Commission for the Conservation of Southern Bluefin Tuna (CCSBT) has recognised that the expansion of markets for Southern Bluefin Tuna (SBT) is a compliance risk for the SBT fishery because it provides a potential avenue for marketing SBT that are caught outside of the CCSBT's conservation and management measures framework.

Consequently, the CCSBT has commenced monitoring the expansion of SBT markets and it is seeking the cooperation of States and Entities with emerging markets for SBT.

At the Seventh Meeting of the CCSBT's Compliance Committee, the CCSBT noted the growing importance of China as a market for SBT.

To further the cooperation between China and the CCSBT, the CCSBT extends an invitation for China to participate as an observer at the next meeting of the CCSBT's Compliance Committee. This meeting will be held in Adelaide, Australia, from 10-12 October 2013. I hope that China will be able to send a representative to the meeting. I will send further details to you closer to the date of the meeting.

Yours Sincerely,

Robert Kennedy
Executive Secretary

Commission for the Conservation of
Southern Bluefin Tuna



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Adrian Lim Yeong Hun
Assistant Director (Fishery Ports)
Agri-Food and Veterinary Authority
5 Maxwell Road, #04-00 MND Complex, Tower Block
Singapore

10 December 2012

Dear Mr Adrian Lim Yeong Hun,

I wrote to Singapore's Agri-Food and Veterinary Authority (AVA) in June and August 2011 in relation to the Commission for the Conservation of Southern Bluefin Tuna's (CCSBT) request for Singapore's cooperation with the CCSBT's Catch Documentation Scheme (CDS). This correspondence is attached for your information. I would appreciate it if you could advise me of the status of CCSBT's request for Singapore's cooperation with the CDS.

The CCSBT has continued to recognise that the expansion of markets for Southern Bluefin Tuna (SBT) is a compliance risk for the SBT fishery because it provides a potential avenue for marketing SBT that are caught outside of the CCSBT's conservation and management measures framework.

Consequently, the CCSBT has commenced monitoring the expansion of SBT markets and it is seeking the cooperation of States and Entities with emerging markets for SBT.

At the Seventh Meeting of the CCSBT's Compliance Committee, the CCSBT noted the growing importance of Singapore as a market for SBT.

To further the cooperation between Singapore and the CCSBT, the CCSBT extends an invitation for Singapore to participate as an observer at the next meeting of the CCSBT's Compliance Committee. This meeting will be held in Adelaide, Australia, from 10-12 October 2013. I hope that Singapore will be able to send a representative to the meeting. I will send further details to you closer to the date of the meeting.

Yours Sincerely,

Robert Kennedy
Executive Secretary

Cc: Mrs Tan-Low Lai Kim, Director Food Supply Resilience Department (AVA)



Ms Tan Poh Hong
Chief Executive Officer
Agri-Food & Veterinary Authority
5 Maxwell Road, #04-00 MND Complex, Tower Block
SINGAPORE 069110

15 June 2011

Dear Ms Hong,

The Commission for the Conservation of Southern Bluefin Tuna (CCSBT) is an international government organisation that was created to manage and conserve the southern bluefin tuna (SBT) fishery.

On behalf of the Commission, I am formally seeking Singapore's cooperation with the CCSBT's Catch Documentation Scheme (CDS). The CDS is designed to provide for the tracking and validation of legitimate SBT product flow from catch to the point of first sale on domestic and export markets. It is intended to minimise the opportunity for the sale of illegal, unregulated and unreported SBT and to provide verification of globally reported catches of SBT.

CCSBT Members¹ are only permitted to accept SBT that have been validated by Members or by Other States/Fishing Entities Cooperating in the CDS (OSECs). One advantage of formal cooperation with the CCSBT CDS as an OSEC is the ability to validate and re-export legally caught SBT to CCSBT Members. In fact, a shipment of SBT re-exported from Singapore to Japan is currently being denied clearance into Japan because Singapore is not yet an OSEC.

Cooperation with CCSBT as an OSEC involves:

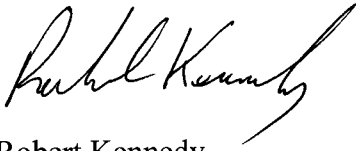
- If Singapore wishes to re-export SBT, details of Singapore's authorised validators should be provided to the Executive Secretary in accordance with paragraphs 5.2 and 5.3 of the CDS. This would be similar to the information that Singapore provides to ICCAT for validation of ICCAT's Statistical Documents.
- Not permitting the landing, transshipment, import, export and/or re-export of SBT caught by vessels or farms that are not on CCSBT's authorised vessel or farm lists (*the CCSBT authorised vessel and farm lists can be obtained from the Authorised Vessel and Farm pages of the CCSBT web site at <http://www.ccsbt.org>*).
- Implementing other parts of the CCSBT CDS that apply to "Other State/Fishing Entity Cooperating in the CDS" (OSEC). For Singapore, this is most likely to be paragraphs 1.7, 5.5, 5.6, 6.1 and 7.3 of the CDS, which involve:
 - Not accepting SBT where the individual SBT do not have a uniquely numbered tag, or where the SBT are not accompanied by the required CDS documents.
 - Not validating any re-export documents that are not complete, or have obviously incorrect information.
 - Retain all original CCSBT CDS documents received and issued by Singapore and forward copies of these documents to the CCSBT Executive Secretary on a quarterly basis.
 - Advise the CCSBT Executive Secretary of any SBT consignments where there are doubts about the information in the CDS documents or the above requirements are not met.

¹ The term "Members" is used within this letter to refer to both CCSBT Members and Cooperating Non-Members.

I have attached a copy of the CCSBT's CDS for your information.

Please contact me if you have any questions. I look forward to your positive written response in relation to cooperation between Singapore and the CCSBT.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Robert Kennedy', written in a cursive style.

Robert Kennedy
Executive Secretary

CC: Adrian Lim Yeong Hun, Assistant Director, Fishery Ports Division, Singapore



Adrian Lim Yeong Hun
Assistant Director (Fishery Ports)
Agri-Food and Veterinary Authority
Singapore

8 August 2011

Dear Mr Adrian Lim Yeong Hun,

Thank you very much for your e-mail letter dated 3 August 2011, enquiring about the CCSBT Catch Documentation Scheme (CDS). I have repeated your questions in italics below, with my responses under each question.

I hope my responses are useful to you. I am happy to provide any further information that you seek.

- 1. As the competent authority of a potential OSEC member, what will be the full obligations of an OSEC member besides the implementation of CCSBT CDS for the documentation of all SBT movement? Eg. would there be a case where SBT is caught by a non-CCSBT registered vessel in non CCSBT waters and is imported into a CCSBT or OSEC member? What would be then the obligation (legal &/or enforcement actions) of the competent authority?*

Unlike CCSBT Members and Cooperating Non-Members (CNMs), OSECs are bound by only the CDS Resolution. However, the CCSBT CDS measure refers to some other CCSBT conservation and management measures, including the CCSBT records of authorised vessels and authorised farms. This means that OSECs also have to comply with certain parts of these other measures that are referred to in the CDS resolution

In relation to the question regarding SBT caught by a non-CCSBT registered vessel in non CCSBT waters, I advise you that the CCSBT has a global jurisdiction for SBT, so Members, CNMs and OSECs are expected to require that all SBT be accompanied by valid CCSBT CDS documentation regardless of location of capture. This means that if the SBT come from a vessel or farm that is not on the CCSBT record of authorised vessels or authorised farms, then that SBT must not be accepted by the OSEC. Similarly, if the CDS documentation is not validated by a person on the list of CCSBT validators, then the SBT must not be accepted.

Information on authorised vessels and farms are available from the CCSBT web site at http://www.ccsbt.org/site/authorised_vessels.php and http://www.ccsbt.org/site/authorised_farms.php respectively.

In practise, this also means that SBT that is caught by any State or Fishing Entity that is not a Member or CNM of the CCSBT cannot be accepted by any Member, CNM or OSEC. It also means that re-exports of SBT from any State or Fishing Entity that is not a Member, CNM, or OSEC of the CCSBT cannot be accepted by any Member, CNM or OSEC.

2. *How does the competent authority of an OSEC member conduct verifications on all the documents (Farm Stocking Form, Farm Transfer Form, Catch Monitoring Form, Catch Tagging Form etc) to be provided by the importers/exporters? Would all these documents (which are required to be uniquely tagged) be logged in the CCSBT system for an OSEC member to verify within the system once an import/export is declared to the OSEC member?*

The only forms that an OSEC is required to deal with are the “Catch Monitoring Form” (CMF) and the “Re-export/Export after Landing of Domestic Product Form” (REEF). The other forms are produced by the catching/farming Members/CNMs and are usually sent only to the CCSBT Secretariat. It is the CCSBT Secretariat that conducts cross verification of information between different form types. However, if an OSEC received SBT with a REEF, then any previous associated REEFs and the original CMF should be provided with that REEF, and the OSEC would be expected to check that this documentation was present and that it all matched.

My expectation is that in most cases, Singapore would be receiving SBT directly from the catching/farming Member/CNM and that these SBT would be exported to Singapore with a single CMF. Singapore might then re-export some or all of these SBT by issuing a REEF (validated by an authorised Singapore validator) and providing a copy of the original CMF with that REEF.

It is expected that an OSEC would check that the vessels/farms specified on the CDS forms were authorised at the time of catching/farming.

Information on approved CCSBT CDS validators is on the private area of the CCSBT web site. Accounts to the relevant part of the private area will be given to Singapore officials if Singapore becomes an OSEC. It is also expected that an OSEC would confirm that the person who validated the document is an approved validator for the Member/CNM/OSEC concerned.

Finally, it is expected that an OSEC would examine the entire CDS document and confirm that it has been filled in without missing information and that there is no obvious incorrect information.

3. *What would be the minimum level of competence required of the OSEC authorities, or other authorised individual/institution, to carry out the obligations under the CCSBT CDS Scheme?*

The officials authorised to validate CDS documents (in Singapore’s case, this would be REEF documents only) must be knowledgeable of the CCSBT CDS scheme, and in particular (for Singapore’s case), know how the CMF and REEF documents work. I would also suggest that the validator should be familiar with SBT storage, processing and re-exporting operations in Singapore. Details of authorised validator(s) must be provided to the CCSBT Secretariat in accordance with Sections 5.2 and 5.3 of the CCSBT CDS Resolution.

4. *Is it possible for the CCSBT to list in detail and provide a brief on the full extent of what such competent authority/authorised individuals/institution must fulfil under the CCSBT CDS Scheme? Eg 1. would the authority/authorised individual/institution be expected to measure and weigh every tagged SBT which is landed/imported? Eg 2. If the tagged whole tuna is imported to be processed and filleted/loined, must OSEC competent authority follow through on the filleting process and verify the weight of the finished products? What happens to the tags then?*

The CCSBT Catch Documentation System is a relatively new system that commenced on 1 January 2010. At present, no standards have been agreed for the level of inspection and measurement required, or on the fate of tags. However, CCSBT Members have noticed that the level of inspection varies significantly between its Members, from inspection of virtually all SBT in all shipments, to inspections of very few shipments. As a consequence of this, the CCSBT is currently in the process of developing minimum standards. It is possible that the standards could be agreed at the upcoming annual meeting in October 2011, but it is also possible that it will take at least another year before there is agreement to the final the standards and I suspect that the final standards will probably be somewhere between the extremes that we currently have.

Until minimum standards are agreed, Members, CNMs and OSECs should implement systems that give them confidence that the CDS is being complied with. In Singapore's case, I envisage that for each import, this would involve a customs official (or similar) conducting the following before allowing the SBT to be imported:

- Check the CDS documentation in the manner described in my response to question "2";
- Verify that the total weight of the shipment matches that on the CDS document based on the best available and practical information;
- Verify that each whole SBT has a tag attached, or conduct random sampling of the SBT to provide a level of confidence that each SBT has a tag; and

For each re-export by Singapore (including re-exports to CCSBT Members and to non-members), I envisage that an authorised Singapore validator would conduct the following before signing the validation section of the REEF document and allowing export:

- Check the CDS documentation in the manner described in my response to question "2";
- Verify that all required associated CDS documents (the CMF and any previous REEFs for these SBT) are attached to the REEF being issued and that the quantity of SBT on the REEF being issued does not exceed that of the associated documents;
- Verify that the total weight and number of each product type of SBT being re-exported matches that on the CDS REEF document based on the best available and practical information; and
- Verify that each whole SBT has a tag attached, or conduct random sampling of the SBT to provide a level of confidence that each SBT has a tag;

In addition to the above, copies of all CDS documentation received and issued by Singapore should be sent to the CCSBT Secretariat on a quarterly basis. Any problems or discrepancies observed in CDS documents should be promptly reported to the CCSBT Secretariat.

Please be aware that the tag should be kept attached to whole SBT to be re-exported (see CDS Resolution 1.7) and that there is no specific obligation for tag attachment to filleted SBT.

5. Would the relevant training be provided by the CCSBT to build up the competence of an OSEC member, especially a member with no prior expertise and/or experience to perform such audits?

The CCSBT has not yet given consideration to providing training to build up the competence of OSECs, but I expect that the CCSBT would look favourably upon such a request. In the interim, the CCSBT Secretariat is willing to provide any assistance and advice it can by e-mail and by phone.

Please contact me if you have any further questions.

Yours Sincerely,



Robert Kennedy
Executive Secretary

Commission for the Conservation of
Southern Bluefin Tuna



みなみまぐろ保存委員会

Mr WONG Chi-kong, Alan, JP
Director of Agriculture, Fisheries and Conservation Department
5/F, Cheung Sha Wan Government Offices
303 Cheung Sha Wan Road, Kowloon
Hong Kong

4 March 2013

Dear Mr Wong,

The Commission for the Conservation of Southern Bluefin Tuna (CCSBT) is an international inter-governmental organisation that was established to ensure, through appropriate management, the conservation and optimum utilisation of Southern Bluefin Tuna (SBT).

The CCSBT has recognised that the expansion of markets for SBT is a compliance risk for the SBT fishery because it provides a potential avenue for marketing SBT that are caught outside of the CCSBT's conservation and management measures framework.

Consequently, the CCSBT has commenced monitoring the expansion of SBT markets and it is seeking the cooperation of States and Entities with emerging markets for SBT.

At the October 2012 meeting of the CCSBT's Compliance Committee, the CCSBT noted the growing importance of Hong Kong as a market for SBT.

To enhance cooperation between Hong Kong and the CCSBT, the CCSBT extends an invitation for Hong Kong to participate as an observer at the next meeting of the CCSBT's Compliance Committee. This meeting will be held in Adelaide, Australia, from 10-12 October 2013.

I hope that Hong Kong will be able to send a representative to the meeting. Please advise me as to whether Hong Kong is interested in attending the meeting, together with contact details such as name and email address (my email address is below). I will send further details to you closer to the date of the meeting.

Yours Sincerely,

Robert Kennedy
Executive Secretary