



Trial Quality Assurance Review

On behalf of the Commission for the Conservation of Southern Bluefin Tuna



Final Report on the Overall QAR Trial

Undertaken by Global Trust Certification Ltd.

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Executive Summary

- This Final Report provides a summary and discussion of the outcomes of the Trial Quality Assurance Review (QAR) of Commission for the Conservation of Southern Bluefin Tuna (CCSBT) Member states against a limited number of the Minimum Performance Requirements (MPRs) of the Commission.
- Overall the trial QAR did not reveal any circumstances which represented a serious and significant risk to meeting the MPRs in section 1.1. All four Members have implemented management and monitoring systems aimed at ensuring the level of annual catch allocated to them by the CCSBT is not exceeded. All four have also implemented thorough documentation systems, both internal and reflecting the CCSBT CDS (which was not specifically reviewed by this trial, but which formed a relevant component of the broader reviews due to the nature of the scheme).
- Individual reports provided for each Member review provide more specific information on the outcomes of the QAR. A summary of recommendations for each Member and overall recommendations is provided in Appendix 1. This report deals with the overall outcome of the feasibility, benefits of using this type of third party assessment and recommendations for future QAR activity.
- The Trial was commissioned by the CCSBT, with the objective of testing the ability of an entirely desktop-based process (i.e. with no site visits) to review the extent to which Member state processes and procedures ensured compliance against the MPRs.
- The Members participating in the Trial were Australia, Japan, Korea and New Zealand. The full detail of the outcome of the four reviews is available in the

individual QAR Report for each Member. A summary of key recommendations and a brief synopsis of the main common issues is provided at the end of this report.

- The Trial QAR methodology was developed using standard third-party audit processes to ensure reliability and consistency when compared to industry standards. A full, detailed, and replicable description of the methodology is provided in Section 3.
- The use of an ISO-based, third-party review system ensures consistency and robustness of the QAR. The process flow charts used to illustrate the management process for each Member were useful for developing understanding and structuring discussion. The remote, desktop-based approach is a cost-effective method of conducting third-party reviews. These and the other strengths of the Trial QAR process are discussed in more detail in Section 4.
- Conference calls are restrained by line quality and other telephony-specific issues. A lack of site visits limits the ability of reviewers to obtain independent verification of processes and other aspects of fishery management. There were some minor language issues. These and other limitations of the Trial QAR process are discussed in more detail in Section 4.
- The third-party, ISO-based review approach increases the credibility and improves the reputation of the CCSBT. It provides confidence to all stakeholders, reliably identifies and aids the correction of any issues, and permits the tracking and publication of improvements to Member processes. These and other issues relating to the value of the QAR process to the CCSBT and Members are discussed in Section 5.
- Future QARs could be adapted to include on-site consultations, external peer review, a more detailed and quantitative results structure, and engage with a broader range

of fishery stakeholders. These and other recommendations for future QARs are provided in Section 6.

Acknowledgement

Global Trust/SAI Global Assurances would like to acknowledge and thank the Members that participated in the QAR for their support, contributions and provision of information that was necessary to undertake the review process. Also, we would like to thank the CCSBT for choosing Global Trust services.

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LIST OF FIGURES

Figure 1 CCSBT QAR project timeline..... **Error! Bookmark not defined.**

ABBREVIATIONS

| | |
|-------|--|
| AC | Allocated Catch (Individual Member quota) |
| ASBTC | Attributable Southern Bluefin Tuna Catch |
| CCSBT | Commission for the Conservation of Southern Bluefin Tuna |
| MPR | Minimum Performance Requirement |
| QAR | Quality Assurance Review |
| SBT | Southern Bluefin Tuna |
| TAC | Total Allowable Catch |

1 Introduction

Between April and August 2013, Global Trust Certification Ltd conducted a Trial Quality Assurance Review (QAR) of four Member states of the Commission for the Conservation of Southern Bluefin Tuna (CCSBT). The four Members participating in the trial were Australia, Japan, Korea and New Zealand. The QAR aimed to demonstrate the feasibility of a fully desktop-based audit of the systems and supporting processes in place to ensure Members meet the obligations set out in CCSBT's Compliance Policy Guideline 1, "Minimum performance requirements to meet CCSBT obligations".

This Overall Trial Report aims to summarise the QAR process, analyse its effectiveness, (benefits and limitations) and provide recommendations for future QARs both of similar and broader scope. As per the original CCSBT specification requirements this report includes:

- A detailed description of the methodology developed for the QAR with sufficient detail to enable the QARs to be repeated with other Members, or with the same Members but for different CCSBT obligations (Sections 3&**Error! Reference source not found.**);
- A description of issues encountered during the trial (including benefits and limitations of the approach and methodology used in the trial) as a method for adoption by CCBST and Members for future QARs (Section **Error! Reference source not found.**);
- Recommendations to CCSBT with respect to building on the credibility and international reputation of CCSBT as a responsible RFMO (Section 5).
- Recommendations for future QARs, including any improvements of the methodology with respect to building confidence among Members' with respect to their MCS systems, the value of independent review mechanisms to demonstrate the quality of their systems internally and externally (Section 6);
- Recommendations to CCSBT and Members on areas where improvement would be beneficial for improved consistency with the CCSBT minimum requirements reviewed (Appendix 1);

2 QAR methodology development

The detailed QAR methodology described above is the result of the experiences and outcomes of the Trial QAR process. Key lessons from the trial review process were used to adapt the initial methodology, and develop the QAR Review and Member Comments templates. Additionally, the trial process included communications with CCSBT and Members with regards to the initial development of the review process and templates than would usually occur in a full QAR. This section lists the main issues encountered during the trial process, describes the benefits and limitations of the approach used during the trial, and explains how these resulted in the final QAR methodology above.

2.1 Trial QAR methodology

The trial QAR methodology was agreed in principle and contractually before the trial review began. However, the exact details and feasibility of the method was documented during the review and the final 'proposed methodology' is the outcome of the trials. The following key bullets document in summary the activities of the review. Section 3 provides a more detailed and ISO procedure consistent description of the methodology that has been developed and is proposed as the outcome of the trials.

1. A QAR report template was developed and agreed with consultation with CCSBT Secretariat, reflecting the agreed terms of reference of the trial review.
2. Initial desktop review of each Member's processes and systems, utilising publicly available documents and documents previously submitted to CCSBT. The results of the desktop review were utilised to populate the report template previously agreed upon with the Secretariat.
3. A detailed process flow map of each Member was developed to provide a 'visual' description of allocation and catch accounting systems. At this stage the flow chart was also based only on publicly available information, and documents previously submitted to CCSBT.
4. Consultation questions were developed which identified areas that required further clarification to allow verification of the system's effectiveness to be reviewed.
5. Consultation questions and requests for evidence such as specimen records, reporting and recording documents were circulated to Members, with the associated draft flow maps.
6. Consultations were held via phone conference at pre agreed times with the Member. The review team consisted where possible of Project Lead Reviewer, Country Lead Reviewer and Support Reviewer. A minimum of two members of the review team participated in consultations; however in the case of the consultation with Japan only one member of the review team was able to communicate in Japanese. Country Lead

Reviewers lead the consultation and questions, with the Support Reviewer providing secretarial support.

7. Consultations followed the following agenda;
 - Introductions and short PowerPoint presentation (outlining the project and the role of the review team)
 - Review of workflow diagram identifying associated questions as the consultation moved through the workflow diagram
 - Synopsis, action points, follow up and next steps, questions
 - Meeting close and thanks
8. Consultation summaries were circulated identifying the documents Members had agreed to provide.
9. Information obtained during the consultation was incorporated into the report.
10. Further contact was made with Members to request additional information where clarification was required.
11. Additional information received from the Member state was incorporated into the report.
12. A SWOT analysis was conducted based on the available information for each Member. The outcome of the analysis documented the strengths, weaknesses and risks identified by the review team in the management processes of each Member.
13. The SWOT analysis also produced recommendations for improvement, identifying areas through the review that may result in improved Member compliance (or improved reporting effectiveness for purposes of subsequent QAR activities).
14. Draft reports and Member Comment Templates were submitted to Members for review and comment.
15. Reports and completed templates were returned to the review team. Comments were considered and responded to, and where appropriate changes were made throughout the report. The completed Member Comment Templates, which include Review Team responses and a summary of action taken, are provided in Appendix 2.
16. Final QAR reports submitted to CCSBT.

3 QAR Detailed Methodology

3.1 Summary

The QAR is an independent desk top review with remote consultation stages with Member authorities to gain further evidence, and seek clarification and verification. The review can examine the performance of Member and Cooperating Non-Member (CNM) fishery management processes and procedures against the CCSBT Minimum Performance Requirements. In this feasibility project, the review focused on Section 1.1 of the CCSBT Compliance Policy Guideline 1, but the following methodology is readily adaptable for any and all Sections of the Compliance Policy Guideline as required. The review is evidence based, with the majority of information sourced directly from the governmental bodies responsible for SBT management.

This section provides a detailed description of the methodology, based on the QAR trial undertaken, which could be adopted by any appointed independent review body conducting QAR reviews to the same specification as the trial. Additional recommendations based on the experience gained during the trial are identified and discussed in Section 6 – Recommendations for Future QARs.

The methodology has been written using the standardized terminology used in third party conformity audit and certification programmes to international standards used for process and product assessment, such as ISO 17065 'Conformity assessment - Requirements for bodies certifying products, processes and services'.

A flow diagram summarising the final QAR methodology is provided at Figure 1.

3.2 Purpose and Scope

This methodology description sets out the detailed procedure that an independent review body shall follow in order to review a Member or Cooperating Non-Member (CNM) of the Commission for the Conservation of Southern Bluefin Tuna (CCSBT) against the Minimum Performance Requirements (MPRs) set out under Obligations of the CCSBT Compliance Policy Guideline 1.

The review process is also referred to as the CCSBT Quality Assurance Review (QAR). For the purposes of document control, this current procedure can be referred to as QAR Methodology Version 1.0.

3.3 Qualification Criteria for Reviewing Organizations

The current CCSBT QAR is not a registered third party accredited programme but utilizes third party assessment procedures such that it is consistent with the norms and practices of third party, independent certification. For this reason, the reviewing organization must be a formally recognized assessment body having achieved ISO 17065 accreditation of its operating systems for third party assessment of products, processes and services. As such, all third party review organizations must be able to demonstrate that:

- They carry formal ISO 17065 accreditation for programmes third party certification services they offer
- They are able to demonstrate that they operate sufficient levels of governance and oversight within their Board and Management structure that allows for independence, impartiality and credibility in the field of assessment application
- They are able to demonstrate that they possess sufficient knowledge and competence to undertake evaluation of fisheries to the required standards of CCSBT.
 - In fulfilling the final requirement, a track record in third party fishery assessment, audit and certification to an ISO 17065 accredited standard will form the basis of demonstration of competence.

3.4 Templates and References

The following CCSBT document provides the basis of the scope of Member review by specifying the nature and extent of the MPRs agreed upon for each Member and CNM:

- Minimum Performance Requirements to meet CCSBT Obligations – Compliance Policy Guideline 1

To facilitate an effective assessment process the following templates are available (further templates would be developed as the review extends to include additional Minimum Performance Requirements within the CCSBT Member Obligations):

- CCSBT QAR template, Version 1.2, August 2013 (hereafter referred to as the QAR template).
- CCSBT QAR Member Review Template Version 1.0, August 2013.

3.5 Appointment of Reviewers

3.5.1 Identification of Members and CNMs

The review organisation shall be directed by CCSBT on the specific Members and CNMs to be subject to the review process. The Review Organisation shall also liaise with CCSBT to determine any additional requirements, such as the language(s) of consultation meetings, written communications and final QAR reports.

3.5.2 Appointment of Review Team by the Review Organization

The Review Organization shall appoint a Review Team with expertise in appropriate disciplines and with sufficient collective experience to review the fishery against the QAR template and in accordance with this QAR Methodology.

The Review Team shall include a Project Lead Reviewer who shall be responsible for the completion of the review in accordance with this procedure, report specifications and any additional requirements agreed with CCSBT

Candidates for the Review Team must meet have demonstrated technical expertise in one or more of the following fields:

- Fishery management and operations - must have experience as a practicing fishery/aquatic natural resource manager and/or fishery/aquatic natural resource management analyst or professional in some other related capacity.
- Current knowledge of the Member or CNM country, language and local fishery context that is sufficient to support meaningful assessment of the fishery.
- Third-party product and management system conformity assessment auditing techniques – must have experience and relevant qualifications as lead auditor. At least one member of the review team must be an ISO lead auditor (International Register of Certificated Auditors).

The Review Organisation shall ensure that the combined expertise of the appointed team is sufficient to enable a full and accurate review of each applicant Member and CNM to be conducted.

3.5.3 Independence, Impartiality and Confidential Arrangements of Reviewers

Individual reviewers must be independent from the management system and associated fishery. There must be a minimum of 2 years since any prior direct involvement in a work related capacity (working for or consulting for) with the Member CNM taking party in the

review. Chosen reviewers must declare any potential conflict of interest and must agree to the confidential arrangement of the QAR through a signed declaration.

3.5.4 Review Team Verification

It is the responsibility of the Reviewing Organization to ensure the designated Review Team members achieve the minimum acceptable criteria as laid out in section 3.5.2 of this document.

The appointment of the Review Team shall be confirmed to the CCSBT.

Reviewers will be appointed on the basis of the following broad criteria:

- Project Lead Reviewer (familiar with the Review Procedures)
- One Country Lead Reviewer per Member or CNM
- One Support Reviewer per Member or CNM

(Recommendation) Where any component of the review (e.g. consultation meetings, final report) is to be conducted in a language other than English, both the Lead and Support reviewers should be sufficiently fluent in that language to carry out the review.

Individual reviewers may hold more than one Country Lead or Support position, but it is the responsibility of the Review Organization and Lead Reviewer to ensure these individuals can complete the required amount of work within agreed timescales.

Reviewers will be briefed on the basis of their specific role in the review plan. There will be a requirement for training and confirmation of all appointed Reviewers in the CCSBT QAR procedure, including the following:

- Overview of the CCSBT QAR procedure
- Understanding of the CCSBT MPRs, and the specific MPRs relevant to the QAR process.
- Familiarization with the QAR template used for review purposes including examination of previous reports
- Overview and understanding of roles and responsibilities for carrying out the assessment

Normally the Project Lead Reviewer shall conduct the necessary training and briefing of Reviewers, otherwise this will be carried out by a member of the Review Organization.

The Review Team will receive copies of the following documents:

- Minimum Performance Requirements to meet CCSBT Obligations – Compliance Policy Guideline 1

- QAR template (the current Version)
- Examples of previous QAR reports, including any conducted on the Member or CNM under review
- Recent, relevant CCSBT documentation produced by the Member or CNM, including the Compliance Action Plan and Annual Review of SBT fisheries.
- Training materials (PowerPoint presentation)

3.5.5 Review Plan

The Review Plan shall be prepared by the Project Lead Reviewer alongside discussion with the appointed Review Team and confirm details of the plan with CCSBT. The primary objective of the Review Plan is to finalise the following components of the review process:

- Agree and plan the desktop review requirements
- Agree and plan the Member consultation personnel for correspondence purposes
- Agree and plan the roles and activities of individual Reviewers
- Agree and plan the timelines and schedule for the review, including; Member information exchange, conference calls, deadlines for the responses of Members to information requests, the submission of draft QAR reports for Member review, the submission of Member comments to the assessment body, and the submission of the completed QAR reports to the CCSBT.

3.5.6 Review Process

The main body of the review process follows this series of steps:

- Initial contact with Member or CNM fishery management bodies, identification of key individuals and collection of core information sources
- Desktop review of core information sources against MPRs
- Consultation conference call(s) with fishery management bodies
- Further communication with fishery management bodies on an ad hoc basis
- Final QAR report, including SWOT analysis
- Submission to Member for review
- (Recommendation) Submission for peer review
- Final adjustments and submission of final QAR Report

In addition to the specific actions listed below, the Project Lead Reviewer will provide support and guidance to all Country Lead Reviewers and Support Reviewers throughout the review process as necessary. The Project Lead Reviewer shall also ensure QAR reports meet the requirements laid out in the Review Plan, and to ensure Reviewers complete their duties in accordance with the requirements of this procedure.

3.5.7 Initial contact with Member or CNM fishery management bodies, identification of key individuals and collection of core information sources

The Project Lead Reviewer shall identify, with direction from CCSBT, the key governmental management bodies and personnel within the Member or CNM state and make initial contact. The objectives of this initial contact are as follows:

- Outline the purpose and process of the QAR review
- Identify the full range of key personnel relevant to conducting the QAR, particularly those who should be present during the consultation conference call(s)
- Obtain any general information on the SBT fishery not already provided by the CCSBT
- Agree upon the timing of the consultation conference call(s)
- Discuss any other aspects of the QAR process as required

The Project Lead Reviewer and Member/CNM may also find it useful to agree an individual to use as a 'point of contact' throughout the review process.

3.5.8 Desktop review of core information sources against MPRs

The initial desktop review and analysis of fishery and fishery related information shall be conducted by the Country Lead Reviewer. The Support Reviewer shall offer support as necessary, and specifically with reviewing initial drafts and supporting potential lines of enquiry for consultation. The review will take place against the specific CCSBT MPRs defined by the CCSBT prior to the outset of the QAR. The objectives of the initial desktop review are as follows:

- Obtain a foundation understanding of the management processes and procedures in place in the SBT fishery under review
- Identify key additional information to be requested before or during the consultation conference call(s)

- Identify key areas requiring additional explanation during the consultation conference call(s)
- Identify key evidence to be requested before or during the consultation conference call(s), including catch reporting forms, observer data collection forms, licencing and auditing forms and any other relevant paperwork
- Produce an initial draft of the QAR Report using the QAR template, including fishery background, systems flow chart and summary of the currently available evidence

Key objectives required by the CCSBT in QAR reviews should also be addressed during the desktop review:

- The extent that Member supporting systems and processes are in place and are fit for purpose for ensuring compliance with national allocations of the SBT TAC
- To what extent the systems meet CCSBT MPR obligations under review
- The extent of any proposed improvements expressed by the Member are planned, underway or completed
- The extent that corrective actions or preventative measures have been taken in response to compliance monitoring

A copy of the QAR Template will be provided to each Reviewer in order to document the initial review in a consistent manner. The contents of the template are described in more detail below. At the initial desktop review stage, the template should be completed as thoroughly as possible given the initially available information.

The initial desktop review shall be primarily based on information provided by the CCSBT and the Member or CNM. Reviewers may also conduct additional research to uncover publicly available information sources where required.

3.5.9 Consultation conference call(s) with fishery management bodies

The additional information requirements, key areas requiring further explanation, and key additional evidence required, as identified above, shall be used to produce a series of points for discussion during the consultation conference call(s).

This list shall be provided to the Member or CNM governmental organisations in advance of the consultation conference call, along with a copy of the draft flow chart. The Country Lead Reviewer shall also produce an agenda and circulate in advance of the call. This information shall be provided to the Member sufficiently in advance of the consultation conference call to enable time to prepare (not less than 1 week prior to the call).

The consultation conference call(s) shall be conducted by the Country Lead Reviewer. The Support Reviewer shall act as secretariat for the call, taking minutes and recording outcomes as appropriate. The call shall be structured in whatever way the Country Lead

Reviewer feels appropriate to best obtain the required information and achieve the objectives listed below.

The Member should ensure attendance of key personnel based on the outcomes of the initial contact discussion, and the list of key discussion points provided before the call.

The key objectives of the consultation conference call(s) are as follows:

- Discuss information gaps and areas requiring additional information as identified during the initial desktop review or during the call itself
- Ensure the accuracy of the Review Team's current understanding of the fishery management processes and procedures, including the draft flow chart and any other information provided to the Member in advance of the call
- Request additional information sources or evidence as identified during the initial desktop review or during the call itself

Where these objectives cannot be completed during a single call, where not all relevant personnel can be present during a single call, or where additional time is needed for any other reason, additional conference calls may be scheduled at the discretion of the Review Team and Member/CNM organisations.

Within a week of the final consultation conference call the Country Lead Reviewer and Support Reviewer shall produce a summary of the outcomes of the call(s), including any actions agreed to be carried out by the Member/CNM. These may include provision of further information or evidence, and answering of questions which could not be answered during the call for any reason.

3.5.10 Further communication with fishery management bodies on an ad hoc basis

Email communication between the Country Lead Reviewer and Member/CNM government organisations shall continue as necessary to ensure the following:

- Any actions agreed upon during the consultation conference call are completed
- Any additional questions, requests for clarification and requests for evidence are answered to the extent possible given review timescales

3.5.11 Consultation outside of the Member Management bodies

The terms of reference for the QAR process do NOT allow for consultation with non-governmental SBT fishery stakeholders. There shall be no consultation with fishery participants, their associations or other stakeholders or interested bodies or persons. Where there is uncertainty as to the role of a body and the prospect of consultation, the Review Team must refer to CCSBT for direction.

3.5.12 Final QAR report SWOT analysis

The QAR report shall be continually updated, expanded and corrected as new information is obtained by the Review Team. The SWOT analysis requires a full and accurate understanding of the fishery management processes and procedures, and shall only be conducted once all relevant information has been obtained or at a point where further information is not available.

The Country Lead Reviewer shall draft the final QAR report and conduct the SWOT analysis in consultation with the rest of the Review Team.

The SWOT – Strengths, Weaknesses, Opportunities and Threats – shall be undertaken on the basis of information presented and analysed during the review. Undocumented information provided during the consultation can be considered by the Review Team and used in support of documented evidence. The extent to which undocumented information is used shall be at the discretion of the Lead Reviewer and, where necessary, the report should indicate the outcome of its use with respect to the SWOT analysis.

Definitions and Guidance for SWOT analysis:

Strengths – areas where the Review Team determine there is strong substantiated and documented evidence suggesting a high probability of conformity to an MPR clause.

Weaknesses – areas where the Review Team determine that the evidence presented some risk of non-conformity to an MPR clause.

Opportunities – determined as Recommendations by QAR procedure. Areas of potential improvement of the Member/CNM Management System which could reduce the risk of non-compliance against a specific or a number of MPR clauses.

Threats – areas that may present a risk to non-compliance of the Member System to their CCSBT obligations under Compliance Policy Guideline 1 and MPR included in the QAR. N.B Threats are considered a risk outcome or consequence of areas that are identified as weaknesses during the SWOT analysis.

3.5.13 Member Report Review

The Project Lead Reviewer shall submit a draft of the QAR Report in PDF format to the Member/CNM for review and comment within the timeline agreed.

The Project Lead Reviewer shall also provide the Member Review Template to formalise the format of the Member/CNM comments along with any additional instructions and, importantly, the deadline for returning comments to the Lead Reviewer by the Member/CNM.

Where Templates and additional written comments are not returned by the Member/CNM within the timeframe, the Lead Reviewer shall notify the Member/CNM of the consequences with regards to the final reporting deadline to the CCSBT. Under such circumstances, additional time for Member responses may be agreed with CCSBT.

Upon receipt of the Member/CNM's written comments the Review Team shall consider each and every comment and issue raised and make a formal response within the Report Template.

This may result in:

- Incorporation of changes into the QAR Report based on comments, new information or clarification provided during the Member review. The Peer Review Reports and Review Team response to the Peer Review comments shall be documented in the final QAR Report.
- (Recommendation) No further changes to the Report based on the Review team's objective opinion. Where no changes are made to the Report, the Review Team shall substantiate the basis that this decision is taken within the Report such as other parties (Member and CCSBT) can clearly identify the basis of this outcome.

3.5.14 (Recommendation) Peer Review of Member QAR

The Review Organisation shall arrange for each QAR Report to be reviewed by a Peer Reviewer considered to be competent in relevant aspects of fishery resource research and management. As a minimum, the Peer Reviewer shall satisfy the key requirements of “Review Team Appointment” above, particularly as they relate to the Member under review. The same procedural requirements for appointment, declaration of no conflict of interest, and confidentiality shall be followed for Peer Reviewer appointment.

An individual Peer Reviewer may be used to review any number of QAR reports.

The Review Organisation shall notify the CCSBT of the proposed Peer Reviewer(s).

The Review Organisation shall agree with the Peer Reviewers a timeframe for the peer review process and submission of feedback from the Peer Reviewers.

Upon receipt of the Peer Reviewer written comments the Review Team shall consider each and every comment and issue raised and make a formal response within the Report Template.

This may result in:

- Incorporation of changes into the QAR Report based on comments, new information or clarification provided during the Member review. The Peer Review Reports and Review Team response to the Peer Review comments shall be documented in the final QAR Report.
- No further changes to the Report based on the Review team’s objective opinion. Where no changes are made to the Report, the Review Team shall substantiate the basis that this decision is taken within the Report such as other parties (Member and CCSBT) can clearly identify the basis of this outcome.

Peer Review reports shall be retained and made available to CCSBT and individual Members.

3.5.15 QAR Report Completion

The main outcome of the review process shall be the production of a final QAR Report for each Member/CNM. The Report shall be based on the QAR Template, and shall be completed by the Country Lead Reviewer with the assistance of the Support Reviewer and Project Lead Reviewer as necessary, and as described elsewhere in this procedure. All sections of the report should be fully referenced whenever appropriate.

3.5.16 Report Contents

Each final QAR Report shall contain the following major items, as laid out in the QAR Template:

- Identification of the Member or CNM it considers
- The background, history and management of the fishery
- A detailed description of all evidence collected by the Review Team, including during the desktop review, consultation conference calls, any other communications with the Member under review, and the final Member comments, organised by MPR as per the QAR Review template
- A process flow chart, providing a graphical illustration of the processes in place to ensure the fishery complies with the MPRs. This should include, but is not limited to, pre-season administration, catch and bycatch monitoring, control and enforcement
- A SWOT analysis of the collected evidence against the MPRs, which should include discussion of major identified strengths, weaknesses and risks of the management processes, and any recommendations for improvement
- Peer review report and responses to peer review comments from the Assessment Team
- An annex providing examples of any supporting paperwork, including catch reporting forms, observer data collection forms, licencing and auditing forms, and so on

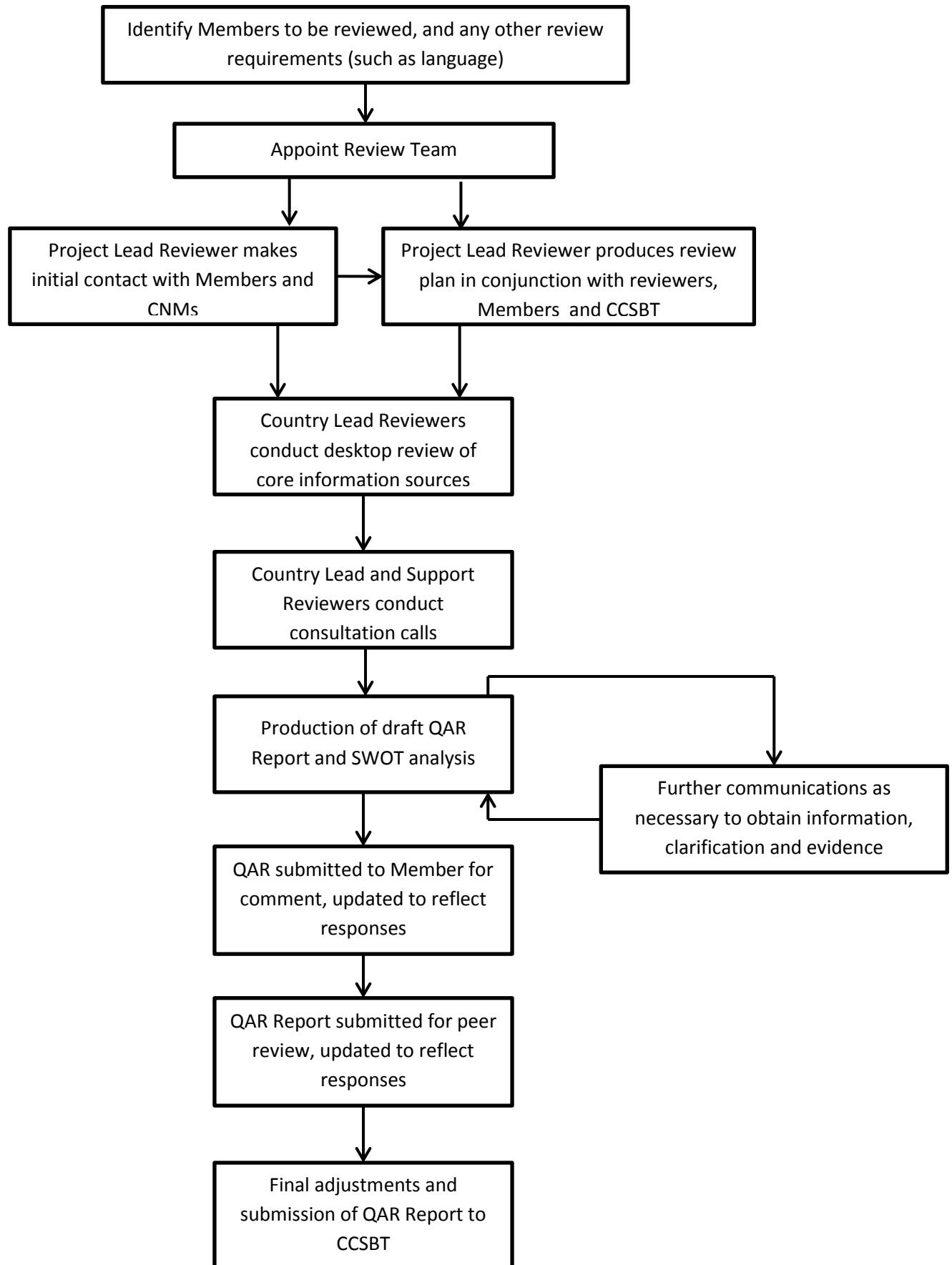


Figure 1 - Final QAR methodology flow chart

4 Strengths and Limitations of the QAR Trial

4.1 ISO Audit Applications

The trial QAR methodology employed has been based upon the principles of third party independent assessment generally in accordance with ISO 17065 Accreditation Standard. The principles of accredited certification are those of independence, impartiality and credibility. Independence is required at an organizational ownership level of certification bodies (referred to here as Review Organizations). For accreditation purposes, such bodies must also demonstrate transparent governance and decision making structures within their operation in order to fulfil stated requirements.

Typically, this requires specific Memorandum of Articles of Association of the Organization, demonstration of independence of ownership or other separation from entities that might fall under the scope of service provision for certification purposes. Impartiality must be demonstrated by the make-up of its appointed Governance Board and credibility is largely borne from a combination of these items and from the consistency delivered through ISO complaint procedures of operation and certification decision making. Other requirements of liability insurance, risk review and financing arrangements also fall within the context of ISO Accreditation accountability to one extent or another.

With reference to auditing principles under third party process and systems certification; these can generally be termed '*evidence based audit*' models, where substantiation of conformity to an agreed standard is measured in the context of formal, documented information presented or collected as evidence to an appointed auditor or audit team.

The strategic approach of evidence collection and review was based on a three step audit approach:

- Does the Management System have documented procedures that are consistent with CCSBT MPR's under review?
- Does the Management System have documentary evidence that demonstrates these procedures are implemented and followed?
- To what extent does the documentary evidence demonstrate effectiveness (compliance) with the CCSBT Member Obligations?

With regards to the trial QAR Review, it was generally felt that the methodology used provided a consistent basis on which to collect and analyse information to describe and demonstrate the level of conformance of Member management approaches against the review MPRs. For the most part, Members were able to provide a good deal of documentary evidence that allowed an objective review of conformity with each MPR to be undertaken.

4.2 Audit Systems used in Fisheries Certification

In certification programmes that measure fishery management systems, such as the Marine Stewardship Council's Sustainable Fishing Scheme, third party audit systems have evolved based on the ISO17065 format. These use a combination of initial desk top review, on-site direct consultation, and follow-up conference calls/information exchanges in order to assess a fishery's ability to meet the performance indicators of the Standard. There are a number of certification programmes that are applied to fisheries that follow this audit model:

- Marine Stewardship Council's Sustainable Fishing Programme
- FAO Based Responsible Fisheries Management Programme (Alaska, Iceland, Gulf of Mexico)
- Friend of the Sea Sustainable Fishing Programme
- IFFO Responsible Sourced: Responsibly Supplied Programme

The CCSBT QAR model is generally aligned in methodology with these programmes, and hence provides confidence derived from the fact that such reviews are undertaken in accordance with both ISO International norms and the standard practices used in the audit systems of fishery management processes.

- **Audit Review Teams**

A review-team-based approach is consistent with these types of audit applications and is typical in ISO models which audit across processes and systems. In these applications, consistency of measurement and objectivity of outcomes are achieved through consensus building within the audit team using the general guidance of the procedure. If the CCSBT QAR approach were to be evolved to include a more numeric or quantified rating system for Member outcomes, it would be appropriate to develop more specific guidance for review teams alongside the developed rating system (see Recommendations, Section 6).

4.3 Consultation Processes

The evidence collected by the Review Team was understandably variable in format and detail between Members. The inclusion of consultation through conference calls was an invaluable step in the review methodology, allowing for greater cross examination, interpretation and clarification of the evidence presented, and the collection of additional evidence as necessary. It was through the consultation calls that most of the evidence demonstrating the consistency of implementation and effectiveness was collected.

Conference calls were structured with an agenda and the country reviewer leading the consultation with one or two reviewers in support. This approach was effective within the broader constraints of conference calling; time constraints, clarity of information verbally exchanged.

The consultation process also presented a number of challenges and. Practicalities such as variable conference line quality (a total of 3 service providers were used; Powwownow; Free Conference Call Services and an internal SAI Global conference facility, but all occasionally succumbed to technical issues on occasion) the time difference challenge to managing international conference calls. Most calls were of a three to four hour duration, with more participants tending to increase time. Midway breaks were included which was felt of benefit. In the case of Japan, there was also a challenge presented by language. The Review Team included the appointment of a Japanese national, who was fluent in Japanese and who lead the Japan consultations, interpretations and translations. However, having only one reviewer fluent in Japanese increased the workload during the conference consultation calls, and required information translation before the wider team could review and achieve consensus on outcomes. If future QAR work is commissioned by CCSBT, we would recommend that both the Country Lead Reviewer and Support Reviewer be fluent in the required language of the QAR process and/or final report.

Despite these challenges, the consultation process was a highly valuable component of the review methodology and we strongly recommend that this is included in any future QAR process. Additionally, SAI Global would recommend that one potential improvement to the consultation process would be for the Review Organisation to conduct on-site face to face discussions with Member management organizations (see Recommendations, Section 6, and below).

- **On-site Consultation with Management Organizations**

In most audit systems used in fisheries certification based on ISO norms, there is an on-site direct consultation step included in the methodology. These discussions generally engage with the various management, science and MCS agencies that make up the fishery management system, although some also include much wider engagement with interested stakeholders and, most typically, eNGOs. On-site consultation does remove some of the limitations of conference calls and allows for greater time to be accommodated to the consultation, which can result in more effective exchange; however it does of course add to the time and cost of the review process. The greatest benefit of on-site consultation is that it supports improved clarification of the meaning of information, which drives the effectiveness and certainty of outcomes of the audit.

- **Member Reviews**

All Members that took part in the review were extremely proactive and supportive in the provision of resources, information and responses to the Review Team. Limitations on time were apparent during the Member review period which resulted in delays for some Members to respond with reviews of the draft reports. However, all Members did respond in full. There was also a deviation on the part of SAI Global in the case of Japan, in that the Member Review Template, a simple document used to support and direct the Member review, was not translated into Japanese due to time constraints. However, Japan did respond in full and within the timeline directly within the Member draft report itself.

- **Note on External Peer Review**

External peer review is often used in third party audit systems. Most of the aforementioned fishery certifications utilize an external peer review step in addition to many other product-process audit systems. External peer review can add additional objectivity and consistency to the process, particularly where the information and evidence under review can be variable from audit to audit. External refers to external (one step removed) from the audit or review team, but within the overall audit process procedure. Generally, external peer reviewers are appointed on the same basis (confidentiality, competence and impartiality) as the audit or review team. The aim of peer review is to identify any areas within an audit outcome which may require further clarification or where outcomes are not consistent with the evidence presented. Peer reviewers normally submit written responses on a complete audit report and audit teams would respond to the comments within the report itself.

Responses to peer review comments can lead to the clarification of existing information or can result in further requests for information from the client. Alternatively, where audit teams concur with peer reviewer findings, the outcomes of the audit can be directly adjusted. External peer review would normally be undertaken prior to the final report stage.

Within the context of the trial QAR, external peer review was undertaken as a test to consider the effectiveness of this approach. The outcome is presented in the Recommendations section.

- **Note on qualitative versus quantitative results**

The SWOT analysis provided largely qualitative although a certain amount of evidence received was conducive for more quantitative review. Should quantitative results be desired in future QARs (see Recommendations, Section 6), they may be difficult to obtain in terms of rating compliance without conducting full traceability reviews of documentation generated by each Member fishery. In other words, additional clarity and specificity with regards to results would require additional steps in the QAR process to ensure accuracy and reliability.

4.4 Summary of Key Limitations

- (All) – Conference call consultation was valuable, but is constrained by the quality of the line and the number of participants who can effectively communicate on a conference call.
- Although no issues were encountered during the trial QARs, the review process does rely upon the cooperation of Member organisation to provide information in a timely manner and engage with the Review Team throughout. This may become a variable in the quality of future QARs.
- The absence of site visits to the management organizations was identified as a limitation but understood as part of the terms of reference prior to the development of the methodology.
- (Korea) – Although the Korean trial was conducted in English, many fishery documents and other evidence sources were in Korean. This significantly restricted the ability of a Review Team on which nobody was fluent in Korean to review these documents. Key documentation was translated by the Member, but in this case places additional demands upon Member capacity and time constraints. N.B. Conference call was not limited as key Korean delegates were able to converse in English.
- (Japan) – The terms of reference required the Japanese trial to be conducted in Japanese. Only one member of the Review Team was fluent in Japanese, which placed considerable additional pressure on both the reviewer and the time constraints of the project. It also limited the ability of the Project Lead Reviewer and other Review Team members to support the conference call consultation.
- (Most) – The time allocated to obtain Member responses to the QAR report draft during the trial may be insufficient. Most Members required more time to review and respond to the reports although all Members returned fully considered comments across each section of their reports. This could be a consideration if future reviews are envisaged.

4.5 Summary of Key Strengths

- Use of ISO audit system standards and procedures as a basis for designing the methodology was a key strength in supporting consistency during the execution of the QARs.
- Use of ISO auditing techniques (including system audit against the MPRs, process audit to confirm consistency with system, and evidence review to identify level of conformity) also improved consistency and the robustness of the QAR process in general.

- Process flow charts proved extremely useful for developing understanding and identifying key gaps in knowledge for consultation, and provided a useful reference for discussion during conference calls.
- Organizational charts were of value in identifying roles and responsibilities within the overall management system.
- Multiple opportunities for Member contribution and comment via e-mail and occasional phone calls, in addition to the conference call consultation and Member QAR report review, provided increased information exchange and allowed the clarification of information at all stages of the QAR process.
- Remote QAR methods are cost effective compared to on-site audits. This becomes a cost benefit discussion with respect to a comparison of conducting purely remote reviews versus review with on-site components.
- The trial QAR methodology puts limited capacity demands on Member states. This would require Member comment with respect to the comparative time to undertake self-reporting compared to that required to participate in a third party remote audit. Third party audit mechanisms can provide added strengths of independent attestation of Member compliance beyond that which self-reporting can deliver. These are described in Section 5.

5 Overall Benefits and Recommendations for Building the Credibility of the QAR and CCSBT

The following group of recommendations to the CCSBT refer as a whole on the QAR activity with respect to building credibility and international reputation. In a general sense, implementing the recommendations in Section 6 will work towards this goal by increasing the robustness of the third-party review and Member/CNM adherence to Commission guidelines.

5.1 Benefits of the current QAR methodology

The adoption of a review process allows CCSBT to identify areas in which there is risk of non-conformity with high levels of certainty, improving the ability of Members and CNMs to improve their systems, and the ability of CCSBT to support this.

Independent, third party review is an accepted and often required activity for fisheries in order to market their products, most particularly to large, multiple- retailers who have identified sustainable sourcing from legally and responsibly managed sustainable fisheries as part of their CSR Policy commitments.

In addition to the strengths described in Section 4 in relation to the specific QAR methodology used during the trial, the adoption of a third-party audit process in general provides benefits to the CCSBT in terms of improved international credibility and reputation. The independence of the third-party provides confidence to all stakeholders, including eNGOs and consumers, in the reliability of the outcomes of such reviews. The use of ISO-compliant systems also increases confidence by improving the reliability and transparency of the review process.

If conducted on a regular basis, reviews such as the QAR allow the long-term monitoring of compliance and the demonstration of improvement. Thus third-party review processes can become central to improving the credibility of RFMOs like the CCSBT by identifying potential issues, aiding correction of issues, and tracking improvement with a high degree of certainty and independence.

The following recommendations are made with these points in mind.

- Develop and implement a regular third-party review of Members and CNMs against core MPRs, based on but not necessarily limited to the trial QAR process. Such a review could examine an expanded set of MPRs, and utilise a more quantitative scoring system.

- Develop and implement a higher-level review of CCSBT systems and process in general. This would determine how effective current CCSBT mechanisms are for achieving the goals of the Commission, and make recommendations based around any identified risks. This process could include a review of all MPRs and produce recommendations for adjustments, additions or removals from the *Compliance Policy Guideline 1*.
- Third party organisations could also be used to establish fishery development programs for CNMs and nations fishing for SBT which are currently not signatories of the CCSBT. These would take the form of an initial review of non-Member processes and management approach, with recommendations for developing these processes to a stage where adherence to the CCSBT MPRs would be achievable.

5.2 Further Recommendations Resulting from the QAR Process

During the course of the trial, a number of minor potential improvements which could improve credibility were identified. At present, each Member and CNM has specific definitions of “attributable SBT catch” and “all fishing-related mortality”. This reduces the extent to which catch and mortality statistics from different Members are directly comparable, and makes the total figures for the entire CCSBT more complex. The following recommendation is made with this in mind:

- Develop universal definitions for “attributable SBT catch” and “all fishing-related mortality”, to be applied to all Members and CNMs.

Another key way to improve credibility and reputation is to ensure transparency of process and outcomes wherever possible. The CCSBT already provides much information on its website, including publishing the full minutes of regular meetings, catch and scientific data and so on. However, the following points, largely based on synthesising the available information and making it available in a single location, could also improve transparency.

- Publish annual quota and catch statistics for all Members and CNMs in one easily-accessible area of the CCSBT website. This could take the form of a table and should include original Allocated Catch, any additional or rollover catch, the national quota for the period (where relevant), and the final reported Attributable SBT Catch for each Member and CNM. Historical statistics should also be made available. Where

Allocated Catch has been exceeded, offer Members space to explain why this has occurred and list any compensatory actions which have been taken to minimise the risk in future. The purpose of this section would be to provide an at-a-glance summary of highest-level measurements of the success of the CCSBT.

- Similarly, publish annual total TAC and total ASBTC across the entire CCSBT.
- Publish executive summaries of the main outcomes of each major CCSBT meeting, particularly with regards to any changes to MPRs.

6 Recommendations for Future QAR Development

Overall, the outcome of the QAR trial did not identify any serious non-compliance issues with respect to Member reviews. The review team agreed that the proposed methodology provides a robust review for the purposes of providing Members and CCSBT with a report on compliance with their MPR Obligations. The method allows for a good deal of independent analysis and questions brought forward through the consultation phase that proved effective at triggering further detail and documentary evidence that substantiated Member compliance.

The method does require that Members participate fully and ‘with the spirit’ of bringing forward information that supports the level of compliance, including where Members’ themselves have identified challenges and weaknesses in their systems. To some extent, the same can be said for all formal third party review activities, however, there are several additional steps in the methodology that might strengthen the independence of the review process and these are identified below.

The following recommendations for future QARs are based on the outcomes of the trial QAR process, including the benefits and limitations identified above. The first group represent minor changes which can be adopted without significant effort, and where relevant have been incorporated into the methodology provided in Section 3. The second group represent more significant changes which would generally require further development of the QAR process.

6.1 Minor Recommendations

- Ensure there are at least two Review Team members fluent in each language in which the QARs are to be conducted.
- Conference calls could be expanded to include a separate call with each of the agencies that takes part in the system. This would allow for greater time per agency and possibly more effective communication. A combined meeting could also be retained within the methodology.
- Increase the amount of time allocated for Member Review responses. Trial QAR Members may have benefited from another 10 days to submit their responses to the Review Team.

- Presentation and briefing of the review methodology to Members prior to undertaking future QAR's to explain the key steps and timelines associated with the review process. Arguably, this was not possible to a great extent due to the developing nature of the methodology throughout the project but could be possible for any future QARs.

6.2 Major Recommendations

6.2.1 Site Visit Consultation

A site visit step in the review process would allow for a greater exchange of information in support of documentation received, and also individual consultations with each component of the management agency. Whilst not a given, face to face meetings can be more dynamic and allow for a greater level of confidence to be transferred on the merits of a Member management system. Site visits in third party certification systems for fisheries tend to be conducted over 2-5 days, and consist of meetings with each agency within the management system (principal agency, science, enforcement etc.). Wider fishery and stakeholder consultation forms part of most audits and could be considered for inclusion in future QARs.

6.2.2 External Peer Review

An external peer review was carried out on one QAR report to assess the value and costs of this step in the process. The external refers to 'external from the review team' but not from the review methodology and not without controls on confidentiality, impartiality and competence as required by CCSBT and standard practice in third party audit systems.

A 'test' external review was undertaken during the Trial QAR after the Member Review on one report, and was conducted over a period of 1 day. A Peer Review template was constructed similarly to the Member Review Template in order to capture responses. Responses were not used in the final report (as only one peer review was undertaken) but a number of returned comments were deemed valuable and may have supported further clarification of information presented. The conclusion reached after the trial was that peer review would provide relevant input and therefore add confidence and reliability to the review process.

6.2.3 Clear Understanding of Objectives of QAR

SAI Global thanks the Members involved in this review in providing resources and full participation in the process which allowed for thorough reporting to take place. It is likely that substantial discussion between the Members participating in the review on the potential value and benefits of the QAR to CCSBT Members took place.

SAI Global notes that the quality of outcome of Member review reports are no doubt aided by thorough communication and clear understanding of the objectives and values of the QAR by all Members to ensure their full participation in the process.

6.2.4 Presentation of Member Review Outcomes

The SWOT analysis conducted during the Trial QAR provided qualitative results, describing strengths and weaknesses of each Member's management regimes and generating recommendations for their improvement, in relation to their compliance with the CCSBT MPRs. The 'results' section of future QARs could be further developed to utilise a more quantitative scoring approach, and thus provide a metric which would allow easier tracking of year-on-year changes, and more direct comparisons between Members if desired.

The development of a full, reliable and consistent quantitative results structure is beyond the scope of this report; however at this stage it is possible to envisage a potential outline for such an improvement. Fundamentally, a ranking would be applied to the Member/CNM against each reviewed MPR, indicating the extent to which the available evidence suggested the management systems in place ensured compliance with the CCSBT Compliance Guidelines. One potential set of rankings could be as follows:

- **Fully meets.** The available evidence strongly suggests that the Member is entirely compliant with all components of this MPR.
- **Meets to a large extent.** The available evidence suggests that the Member is largely compliant with this MPR, but there are some minor improvements possible.
- **Meets to some extent.** The available evidence suggests that the Member may not be compliant with this MPR.
- **Does not meet.** The available evidence strongly clearly indicates ways in which the Member is not compliant with this MPR.

Such a ranking system could also be further developed to provide a basic numerical score (e.g. 0-3 points for each MPR). Additionally, a more thorough dissection of the requirements

(list of specific documents, evidence and even a description of ‘the model’ answer) may support a more comparative based scoring system for Member reports. This may require a certain amount of flexibility or recognition of the individual nature of Member’s own management systems and approaches. This could be documented in Guidance to Reviewers Reference Manual. Overall, the development of any type of rating or scoring system should set out the objectives and support the overall accuracy, consistency and reliability of the review process and outcomes.

6.2.4 Wider Consultation

The Trial QAR was limited in the terms of reference to direct contact with governmental information sources only. Allowing review team to contact and obtain information from a wider range of sources would improve the external credibility of the report and also increase the range of information available to reviewers. There may be constraints on willingness and how to incorporate these consultations within the methodology. Additional consultation contacts could include representatives of:

- Industry
- NGOs
- RFMOs
- Other significant fishery stakeholders.

Appendix 1: Trial QAR Results – Recommendations for Members and CCSBT

The ‘opportunities’ component of the trial QAR SWOT analysis (also referred to for the purposes of the QAR as ‘recommendations’) contained a number of points for each Member reviewed. This section provides a summary of these recommendations and provides a brief analysis of the overall lessons which can be learned from these results.

A1.1 Australia

The recommendations from the Australia SWOT were as follows:

- Publicise total un-fished SBT quota when it falls below a threshold level and/or hold quota in reserve for the end of the season.
- Increase observer coverage, particularly in the direct landings sector and on towing vessels.
- Introduce training schemes for capture and tow vessel crew to ensure measurements are taken using the same methodology as observers.
- Continue with the development of the nationwide recreational fishery monitoring program.
- Report estimates of recreational fishery removals to CCSBT as soon as they become available.
- Increase observer coverage, particularly in the direct landings sector and on towing vessels
- Continue the roll-out of stereo-video technology. Ensure the accuracy of the systems are frequently checked, and continue researching potential improvements to the stocking-monitoring process.

A1.2 Japan

The recommendations from the Japan SWOT were as follows:

- The role of observers and the use of the data related to catch reporting obligations should be reviewed to ensure the effectiveness. Consideration of incorporating and cross-referencing the SBT mortality calculated with the data from scientific observer reports and from fishery logbooks.

- Considering defining or integration of meaning of release / discards and / or bycatch recorded in RTMP, observer records and logbook for accurate calculation and reporting of SBT mortality.
- Review with the objective of increased effectiveness of at-sea monitoring and integration with CCSBT obligations in the monitoring purpose to reduce the potential risk of high grading/discarding of SBT at sea.
- Consideration of establishment of random checking system for DNA tests to increase effectiveness and practicality.
- Introduction of risk-based analysis for control measures related to national allocation compliance, especially for non-reporting risks.
- Consideration for establishing improved market traceability and recording utilizing CDS in order to easily understand market distribution volume of SBT and support verification.

A1.3 Korea

The recommendations from the Korea SWOT were as follows:

- Encourage vessels/companies to transfer unused quota, e.g. by permitting financial exchanges.
- Develop official documentation for inter-company quota transfers.
- Require vessels to weigh fish before any processing (i.e. before tails are removed)
- Increase observer coverage and/or introduce at-sea inspections of vessels
- Require catch to be landed within 60 days of the end of the fishing season.
- Introduce at-sea inspections.
- Continue the implementation of 24/7 physical VMS monitoring.
- Ensure carry-over notifications include all necessary information, including total catch for the season past and total quota for the season ahead.

A1.4 New Zealand

The recommendations from the New Zealand SWOT were as follows:

- Move to electronic reporting system to increase efficiency and remove potential delays of data submissions that are posted;
- Increased observer coverage and at-sea inspections of domestic vessels would reduce the risk of high grading/discarding.

- The standard of third party validators should be reviewed to ensure consistency across the stakeholders involved. This should include a review of the current training procedures and site visits. This could potentially involve the use of audits of the third party validation process.
- Increased observer coverage of commercial vessels. MPI's observer coverage plan for 2013/14 shows that there is to be an increase in the observer coverage on board tuna vessels.
- Increased observer coverage and at seas inspections to reduce the potential risk of high grading/discarding of SBT at sea.
- Increase the coverage of VMS to incorporate all SBT vessels. However, it is recognised that this would require substantial changes to fishery legislation and may not be feasible at the current time;
- Genetic testing to reduce misidentification of exports. This is currently being assessed by MPI to determine if it is a viable option;
- Increased engagement with the recreational charter fleet to provide training on species identification to ensure accurate catch reports.

A1.5 Recommendation Conclusions

In general, the trial QAR did not reveal any circumstances which represented a serious and significant risk to meeting the MPRs in section 1.1. All four Members have implemented management and monitoring systems aimed at ensuring the level of annual catch allocated to them by the CCSBT is not exceeded. All four have also implemented thorough documentation systems, both internal and reflecting the CCSBT CDS (which was not specifically reviewed by this trial, but which formed a relevant component of the broader reviews due to the nature of the scheme).

A1.5.1 Weighing after tailing

The Korean review revealed the practice of tailing SBT before weighing, and then applying a conversion factor to estimate total original weight. In their response to the draft review, the Korean government noted that this was common practice amongst many fishers to ensure the freshness of the fish by bleeding it immediately and also noted that it made it much easier to weigh the fish. Although this is an issue which has been discussed at CCSBT meetings (and the conversion factor is a product of such discussions), it cannot be denied that this introduces an additional element of uncertainty into catch estimates. Without site visits to determine the weighing apparatus available on vessels it is difficult for the review

team to determine the feasibility of this recommendation, but if at all possible fish should be weighed before tailing to ensure an accurate estimate of total fishery removals.

A1.5.2 Increase observer coverage

A common theme across all four Members was the recommendation to increase observer coverage, at-sea and in-port inspections. These activities perform two essential roles: fishery independent data collection and verification of fishery-dependent data; and compliance monitoring and enforcement. Due to the desk-based nature of the trial it is not possible for the review team to determine the level of risk presented by current levels of observer and inspection coverage; however it is clear that any increase in coverage will reduce risk. In particular, though, any circumstances where vessels know there is no chance of inspection or observation represents significant potential for non-compliance or false documentation. However, it is beyond the scope of the trial QAR to determine whether such activity is actually occurring, and it should be made clear that there was no evidence of such activity uncovered in any of the four Members during the trial review.

A1.5.3 Recreational and other removals

The Australian trial review revealed that recreational fisheries are a potentially significant source of SBT removals which are not currently included in reports to CCSBT due to no estimates of total catch being available. Similarly, the Japanese trial review led to a recommendation for clearer recording of discards, bycatch, and live release of SBT to ensure accurate estimates of SBT mortality outside those of commercially retained catch. As the trial QAR did not include analysis of the process used by CCSBT to generate the initial TAC it is not possible to comment on the extent to which unrecorded removals affect the large-scale management of the SBT fishery; however it is clear that more, accurate information provides fishery scientists with a better understanding of the stock and reduces risk overall. All Members should strive to accurately report any SBT mortality which occurs within their waters for any reason.