



Trial Quality Assurance Review

On behalf of the Commission for the Conservation of

Southern Bluefin Tuna



Final Report on the Overall 2015 QAR Programme

Global Trust Certification Ltd.

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Executive Summary

The purpose of this final report of the QAR for 2015 is to provide:

- The detailed description of the methodology used for the QAR
- A description of issues encountered during the reviews including benefits and limitations of the approach and methodology used in the programme
- Recommendations for future QARs, including any improvements of the methodology.
- This report provides a summary of the 2015 Quality Assurance Review which was undertaken for Japan. Similar to 2014 review for Australia, this QAR was based on an up-date to QAR Phase 1 (desk top review) and a Phase 2 on-site audit.
- While the individual Member report for Japan provides more detailed evidence on the outcomes of the QAR, this report deals with the overall outcome of the feasibility, including any limitations of the procedure and recommendations for future QAR development activity. A description of the procedure is provided in Section 3.
- As noted in previous reports, third-party, ISO-based approaches can increase the credibility of reported outcomes against stated objectives and thereby, support the reputation and confidence among users and external parties in the systems and processes used by an organisation- in this case, a Regional Fisheries Management Organisation.
- The QAR for Japan was conducted according to the procedure developed in 2014 for conducting combined Phase 1 and Phase 2 reviews. The QAR Phase 2 review conducted on Japan further substantiated the value of on-site audit.
- A scoring matrix was also developed for the MPR's and tested on the evidence/outcome of audit for the Japanese Phase 2 QAR. The outcome of this test is discussed in this report.
- Overall, the outcome of QAR Phase 2 proved consistent with QAR 1 in that, Japan operates a mature and coordinated system for implementation of CCBT MPR's.
- QAR Phase 1 for Japan provided a good level of understanding of the systems specific to the MPR's under review. Phase 1 also identified evidence of implementation via the records and documents generated via the CDS. However,

the Phase 2 on site audit gave a much greater opportunity to identify the routines and practices that are employed by Japan to achieve the objectives of the MPR's. Therefore, it allowed for a greater understanding of effectiveness and also identify any potential weaknesses or risks in the system.

- The scoring matrix proved useful in providing a quantitative outcome of performance. However, Global Trust has not currently proposed an outcome score that is pivotal between meeting and not meeting CCSBT MPR Obligations. We believe that further testing and comparison is necessary before a pass/fail limit is described. Scores can be converted to percentages for ease of comparison but as this is currently a feasibility test, there is need for further discussion and CCSBT agreement/approval on any final scoring matrix before this is applied in a formal sense within the QAR.
- Strengths and weaknesses of the Trial QAR procedure are discussed in more detail and a synopsis provided below.

Summary of Outcome of Japan Phase 2 QAR:

The review has identified a small number of potential weaknesses that could transpire into risks of reducing the effectiveness of achieving MPR objectives. In summary, these are:

- As previously stated; QAR's Member effectiveness can only be achieved with substantial documentary information. Where information is either not available or not accessible to the review team, management system effectiveness cannot be confirmed. Phase 2 was designed to support both the acquisition of documentary evidence and allow more direct witnessing of management processes/operations such as at port inspection.
- The Japanese QAR Phase 2 was both conducted and documented initially in the local language. On site audits in the local language are required for the simple premise of respecting the language that the system has been developed and facilitating the flow of information through good communication.
- However, the drafting of the report in the local language did create an obstacle for the full team compliment to totally engage in the review process, (not all Japanese speaking) which resulted in delays in finalising the report. Additionally, the translation of the report from Japanese to English proved both expensive and time consuming.

- Phase 1 and 2 reviews can be conducted separately or in combination. As stated in the outcome of 2014 reviews, it may be more cost effective to combine Phases into a seamless QAR consisting of an initial review that substantiated the extent of the system and processes followed immediately by a site visit that would fully establish the degree of implementation and effectiveness.
- The objective of designing a third-party, ISO-based review system is to create consistency and robustness in the review process. Both desk top and on-site procedures were developed with this purpose and to a large extent, proved effective at delivering objective based outcomes substantiated through on-site witnessing of systems and documentation.
- The process flow charts used to 'capture' the management processes for each Member were again very useful for developing understanding, structuring discussion and describing the components within each of the management systems used.
- Report formats of QAR 1 and 2 can be described as thorough but to some extent quite lengthy (wordy). It is envisaged that the scoring matrix will make the outcomes of the process more accessible to Members and CCSBT and ultimately, more comparable in outcomes between Members. This is discussed in the report.
- There may be value in the integration of the exiting Member Compliance Reports more directly, essentially a self-declaration with the QAR. The Member report format may require some re-structuring and/or the QAR format could also be re-configured to better fit. The self-declaration would be subject to a short QAR 1 review (essentially, an external audit of the report and proceeding with the on-site Phase 2 audit as normal but using a scoring matrix.

Acknowledgement

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Also, Global Trust would like to extend a thank you to CCSBT.

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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 February and September 2015, Global Trust Certification Ltd conducted Quality Assurance Reviews (QAR) on one Member states of the Commission for the Conservation of Southern Bluefin Tuna (CCSBT), Japan.

- The objective of designing a third-party, ISO-based review system is to create consistency and robustness in the review process. Both desk top and on-site procedures were developed with this purpose and to a large extent, proved effective at delivering objective based outcomes substantiated through on-site witnessing of systems and documentation.
- The process flow charts used to 'capture' the management processes for Japan were again very useful for developing understanding, structuring discussion and describing the components within each of the management systems used.

The QAR procedure has been developed tested on a number of CCSBT Members (Australia, New Zealand, Republic of Korea, Taiwan, Indonesia and now Japan) either for Phase 1 remote or Phase 2 on-site audits. Overall, a third party audit process has proven to be an effective method of demonstrating compliance to CCSBT Policy Guideline 1' 'Minimum Performance Requirements to meet CCSBT obligations'.

A third party audit system can provide an unbiased, objective, evidence based approach to identifying performance and possible areas for improvement for CCSBT Members.

Demonstration of implementation of MPR's has been based on the existence of documented procedures (Phase 1) and on witnessing to what extent these procedures are implemented (Phase 1 via receipt of CDS forms and Phase 2 via more detailed cross examination of documents, witnessing processes and discussions with officials). The approach is based on standard audit practice of examining the existence of formal documented procedures, assessing to what extent they are followed (implemented) and then, determining their effectiveness- in this case, at delivering the intent of the MPR's.

Additionally, the QAR for Japan also developed a scoring matrix that would support the QAR outcomes by providing a quantitative basis to performance, help streamline the overall report structure and add to the comparability of Member Reports.

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 repeatable with other Members, or with the same Members but for different CCSBT obligations (refer to Appendices);
- A description of issues encountered during the trial (including strengths and limitations of the approach and methodology used in the trial)
- Recommendations to CCSBT for future improvements of the methodology with respect to streamlining the application and making the outcome of QARs more accessible and comparable

2 Phase 2 QAR methodology development and Proposals

2.1 Feasibility and deviations from methodology

The 2014 feasibility QAR conducted for Japan Phase 1 focused on Section 1.1 of the CCSBT Compliance Policy Guideline 1. The scope of the assessment was limited to obligations and associated Minimum Performance Requirements in sections 1.1, 2.3, 3.1, 3.3 and 6.5 of this policy, which are aimed at ensuring Members and Co-operating Non-Members have implemented adequate measures to ensure they do not exceed their Allocation of the global Southern Bluefin Tuna (SBT) catch, and are compliant with the Catch Documentation Scheme (CDS) and regulations associated with SBT transhipments. The obligations in this policy are derived from CCSBT Resolutions and Decisions, in particular:

- The "Resolution on the Allocation of the Global Total Allowable Catch"; and
- The "Resolution on Limited Carry-forward of Unfished Annual Total Allowable Catch of Southern Bluefin Tuna within Three Year Quota Blocks".
- The "Resolution on the Implementation of a CCSBT Catch Documentation Scheme".

Additional Minimum Performance Requirements (MPR) were included in 2015 (similar to 2014) which extend the scope of both Phase 1 and Phase 2 reviews.

Specifically, these are:

- 3.1 Catch Documentation System (A-F)
- 2.3 Record of Authorized Carrier Vessels (part of Transhipment Resolution)
- 3.3 Transhipment (At sea) Monitoring Program (Resolution)
- 6.5 Annual Reporting to the Compliance Committee (Suite of Decisions/Resolutions/Recommendations).

Phase 2 of the QAR process is an on-site inspection of and consultation on the Member's MCS systems and processes. The objective of Phase 2 is the independent verification of the existence and effectiveness of Members' systems and processes, and to ensure the accuracy of the information collected during Phase 1.

During Phase 2, the objective was to determine:

• Whether the documentation of systems and processes in Phase 1 are correct, and whether the documentation accurately reflects the systems and processes that are actually in place.

- Whether these systems and processes are effective to ensure that Members meet their obligations.
- Whether there is any possible further improvement of each Members compliance systems and processes, taking into account the results of the assessments listed above.

The methodology has been based upon standardized approaches 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'*.

The QAR procedure is contained in the Appendices.

Phase 2 Audit

The Phase 2 site visit was scoped, scheduled and confirmed by the lead reviewer in consultation with the project manager. Considerable contact with the Japanese Fisheries Agency (FA) was undertaken during this coordination. The result was a very comprehensive and expansive site visit schedule which also extended beyond the fishery management entities and into the fishery associations and other government departments. Prior communication and agreement from FA was sought for these meetings.

Unfortunately, witnessing of a physical portside inspection of a tuna vessel could not be undertaken due to timing (vessels at sea) although visits to Shimizu Port was undertaken to visit facilities and Port authorities and at least, get a good sense of how inspections take place and to audit staff performing these duties.

Post the site audits, the information was used to up-date Phase 1 reports (additional MPR's) and provide a summary of key differences (gap analysis) between Phase 1 and 2 outcomes. A full description of the site visit is presented in the QAR.

An interim report for Japan was sent at the end of May according to requirements and comments were received prior to the close of the July 31st deadline. Whilst further clarification was sought, the QAR was conducted according to procedure.

The final QAR report for Japan was completed August 31st but the report at that point had not been translated into English and hence, considerable delays were encountered in conducting an internal quality and consistency review at Global Trust due to the inaccessibility of the report.

Translations of the clause outcome components of the report were completed on September 10th and an interim Summary Report in English was produced on September 20th.

• The final QAR English version for Japan was incomplete at the time of writing this report.

2.2 Scoring Matrix

A scoring matrix was developed as part of the development of the QAR process. The intention was to support the objectiveness of the process, provide a more numeric quantification of the outcome of a QAR, to some extent replacing the rather descriptive and lengthy outcomes currently described and allow for more comparable understanding of Member performance.

The scoring matrix commenced initially as a semi-qualitative tool, based on low, medium and high compliance. However, post testing on elements of completed QAR reports, it was decided that a numeric scoring system would support objectiveness and provide greater graduation of the performance of a Member. Traffic light type systems can often result in a lot of 'amber' outcomes.

2.3 Scoring Matrix Approach and Methodology

There are three main scoring elements considered:

- Process (documented)
- Implementation
- Effectiveness

Process is a major part of CCSBT Minimum Compliance Requirements and for almost all criteria, there is a requirement for formal, recognizable and repeatable processes to be in place in order to fulfil the obligation of the clause. The most tangible way to demonstrate that formal procedures exist is to have them documented and ratified within a management system, either through legislative mechanisms or through the mandated responsibilities of appointed organisations. To a large extent, within the QAR process, QAR 1 can achieve a great deal in confirming that formal procedures exist.

Implementation of processes from an audit perspective, becomes more routine when documented procedures exist and can be cross referenced through consultation with the relevant 'actors' and by reviewing evidence of implementation such as records, activity reports, outcomes from meetings etc. To a great extent, QAR 1 can also achieve a good level of verification that processes are implemented and are consistent with procedure and with MPR clauses. On site activities provide a far greater opportunity to witness the implementation practices and provide more specific verification that routines are established, understood by those involved and consistently followed.

The effectiveness of processes and ultimately, that of the management system at meeting the overall objectives of the MPR's is largely measured by outcomes. Fundamentally, an

effective system is one that demonstrates the ability to implement an SBT allocation, manage what the fishery catches, account for it and report on it accurately; and maintain attributable catch within the allocated amount. There are other aspects of the system that must demonstrate effectiveness which may also change depending on Member. For example, Japan is the major market for SBT and hence, accountability on imported SBT is an important area for assessing effectiveness.

Therefore, for each MPR criteria, the score achieved is based on the combination of these three scoring elements. Analysis can then be undertaken at the criteria level (a combination of process, implementation and effectiveness) or at the element level, an overall consideration if the management system has a high level of process implementation or effectiveness. Currently, the scoring matrix tested is based upon a set of benchmark guideposts (for scoring 1, 2 or 3), which are defined for each criteria under process, implementation and effectiveness. The guideposts were designed to be as generic as possible but some adaptation was undertaken in instances where this better suited the intent and wording of the MPR criteria.

Examples are provided below and the full scoring matrix is provided at the end of this report.

(i) Table of Proposed Scoring Element Definitions

Definitions	Description
Process (documented)	Documented procedures exist specific to the MPR clause. These can include the general legally binding fishery regulations and policy documents but as relevant, should include more detailed specific procedures that address SBT MPR implementation.
Implemented	Evidence is available that demonstrates the MPR is implemented in the member management system for SBT. Model documents such as CDS can be used directly but there must be physical evidence of the forms being used, certified and verified and records of the authorisation of these individuals.
Effective	There must be evidence that the outcome of the implementation of the MPR is working effectively in accordance with the objectives. This should include the routine in season verification systems that demonstrate the MPR are implemented and effective and annual review of the overall systems.

(ii) Tables of Generic Scoring Matrix benchmark Guides- Process (documented)

Process (documented)			
1	2	3	
Very little of the process is defined in documented procedures	Informal non-legally binding rules in place. Documentation consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	

(iii) Example of adapted Process (documented) guidepost for MPR's that specifically require reporting to CCSBT.

	MPR Criteria	1	2	3
3.1.7	MPR 3: All fishing-related SBT mortality is reported annually to the Extended Scientific Committee, for incorporation into stock assessment analysis, and to the Commission.	No documentation / evidence of reports being submitted to CCSBT as specified by the MPR and associated CCSBT obligations	Reports submitted to CCSBT but outside of the timeframes required by CCSBT as specified by the MPR and associated CCSBT obligations	Reports submitted to CCSBT in accordance with the timeframes required by CCSBT as specified by the MPR and associated CCSBT obligations

(iv) Table (1-3) of Scoring Matrix benchmark Guides – Implementation Examples

	MPR	1	2	3
3.1.1	MPR 1 – "Rules in place to ensure that the total 'Attributable SBT Catch' of each Member does not exceed the Member's Allocated Catch for the relevant period."	Rules/systems not or only sparsely implemented	Rules partially implemented	Full implementation according to the specified documentation

	MPR	1	2	3
3.1.6	MPR 2c: Ensure accuracy of the "Attributable SBT Catch", including (for fishing Members) a physical inspection regime of SBT caught by the Member's fishing vessel, and (for farming Members) monitoring the accuracy of the stereo video monitoring and adjusting/ re-calibrating where necessary.	Data checking process / auditing not implemented.	Reports observed that demonstrate the data checking process / auditing is conducted by management that incorporate a part of the SBT fishery.	Reports observed that demonstrate the data checking process / auditing is conducted by management that incorporate the whole SBT fishery.

	MPR	1	2	3
3.1.8	MPR 4: Operating systems and processes applied to monitor compliance with annual catching arrangements, and impose sanctions or remedies where necessary.	Monitoring compliance with the control measures; and imposing of sanctions or corrective action programmes for any non- compliance detected not implemented as specified by the MPR and associated CCSBT obligations	Demonstrable implementation of monitoring compliance with the control measures. The imposing of sanctions or corrective action programmes for any non- compliance detected not demonstrable as specified by the MPR and associated CCSBT obligations	Full implementation of monitoring compliance with the control measures, and imposing of sanctions or corrective action programmes for any non-compliance detected as specified by the MPR and associated CCSBT obligations

(v) Tables of Scoring Matrix benchmark Guides – Effectiveness Examples

	MPR	1	2	3
3.1.1	MPR 1 – "Rules in place to ensure that the total 'Attributable SBT Catch' of each Member does not exceed the Member's Allocated Catch for the relevant period."	Member's reported 'Attributable SBT Catch' exceeds the Member's Allocated Catch	Member's reported 'Attributable SBT Catch' has exceeded the Member's Allocated Catch but is appropriately addressed and recorded to CCSBT's requirements.	Member's reported 'Attributable SBT Catch' does not exceed Member Allocated Catch

	MPR	1	2	3
3.1.4	MPR 2a (iii): [Operating systems and processes established to implement annual catching arrangements, including] Weekly reporting of catches by large scale tuna long liners and monthly reporting of catches by coastal fishing vessels.	Weekly recording of all catches are not recorded	Weekly recording of all catches. Discrepancies noted when matching daily recording of catches.	Weekly recording of all catches. Minor discrepancies noted when matching weekly recording of catches. Discrepancies identified and clarified with supporting records.

	MPR	1	2	3
3.1.6	MPR 2c: Ensure accuracy of the "Attributable SBT Catch", including (for fishing Members) a physical inspection regime of SBT caught by the Member's fishing vessel, and (for farming Members) monitoring the accuracy of the stereo video monitoring and adjusting/ re-calibrating where necessary.	Data checking / auditing process does not exist to ensure accuracy if the "Attributable SBT Catch".	Data checking / auditing process exist but demonstrate that there are inaccuracies in the "Attributable SBT Catch".	Data checking / auditing process demonstrates that the "Attributable SBT Catch" is accurate.

2.4 Scoring System Application

Initially, the scoring system for tested and adapted using available QAR Phase 2 report information, focusing mainly on Australia as a recent Phase 2 report that had returned a high level of compliance). This allowed an assessment of the consistency of the guidepost language and the scoring outcomes under each element and overall score. Phase 2 for Indonesia had not been completed at the time and therefore not tested.

The scoring matrix was then tested using the evidence collected and reported on for Japan. Since the matrix was and still remains under 'feasibility' it was not presented in the final report for Japan. The scoring test carried out on the Japan QAR is contained at the end of this report. Overall, the scoring matrix proved workable and provides a level of definition that may be more valuable than a simple traffic light approach. The scoring system (1,2,3) based on improving performance with higher scores can be adapted in future and there may be merit in introducing a zero, 1, 2, 3 approach. The lowest score for any MPR is currently a 1 which denotes either no evidence or 'sparse', 'minimal', 'very little' evidence being available and in some cases, a direct contradiction where a Member does not follow a certain MPR. A 'one' score at this time was used since, in almost all circumstances, the likelihood is that there is some very basic evidence of performance.

The overall accumulated score provides a quantitative definition of performance. However, Global Trust has not proposed a score that is pivotal between meeting and not meeting CCSBT MPR Obligations. Scores can be converted to percentages and these are presented but as this is currently a feasibility test, there will be a need for further discussion and CCSBT agreement/approval on any final scoring matrix before this is applied in a formal sense. However, one could readily see how a 90% overall score can be compared to a 50% score. Similarly, by reviewing individual scores, areas that perform lower in either individual Member or across Members can be identified for further review and discussion. Benchmarking and tracking performance over time can also become a feature of the QAR's. As an additional comment, scored QAR's may also provide an incentive to Members to demonstrate high scores and maintain these overtime.

The overall score recorded in this exercise for Japan was 439 out of a possible 456 points, or 96.3% when expressed as a percentage. The total points available will vary slightly for each Member since a limited number of MPR's are very specific (e.g. Farming states or MPR's which refer to recreational fisheries). However, expressed as a percentage, comparisons should be possible.

Whilst the exercise provides a strong basis for developing a scoring matrix, there were also occasions when the guideposts were not as ideally described and further iteration and testing would be a distinct benefit to improving the scoring process. Further definition of the evidence basis required to score at the highest level would also be of benefit. For

example, where there is no evidence of non-compliance in fulfilling CDS form filling or tagging by the fishery and no evidence of discrepancies in the CDS validation/verification systems, this can suggest either a highly compliant fishery or that systems are not sufficiently robust to detect irregularities. In this test instance, processes appear well established and apart from the potential weaknesses noted (at sea monitoring/enforcement and at port patrols for secondary ports), no evidence of irregular cases was detected. Hence, reduced scores were assigned to implementation elements of MPR's but rarely, those related to effectiveness.

As stated, the scoring matrix was used as a feasibility test and the outcome of the feasibility is more important at this stage.

Improvements to the scoring system were identified and these would include:

- Further review/re-working of the scoring element guideposts for each MPR.
- Possible review of scoring to widen and make more noticeable, the difference between each level of compliance. For example; 1, 5 and 7. [The score is very much linked to the guidepost language].
- Scores could also be weighted for MPR's that require definite rules to be established and which are very specific to the overall objective of the MPR Obligations.
- Testing of the matrix on current available QAR Reports would also provide further testing material to refine the method and scoring matrix application.

Improvements to the structuring of the QAR Report format:

 It is conceivable that a tabular scoring matrix with 'good' scoring notes and evidence column for each MPR could replace the current structure of the QAR report format. This may lead to a more concise and less 'wordy' report. This may be of particular interest to non English speaking members.

3 Strengths and Weaknesses of the QAR Phase 2 (Japan 2015 QAR)

Further to the previous QAR Phase 2 activity, the 2015 QAR for Japan, strengths and weaknesses of the approach were identified.

3.1 Strengths of the QAR Phase 2

The strengths of Phase 2 QAR are described:

- As stated previously, a third party, independent audit approach to reviewing Member compliance to QAR's is considered a proficient and effective way that Members of CCSBT can demonstrate compliance to the MPR's.
- Additionally, a standardized approach and report creates impartial and readily comparable outcomes (for same Phase reviews). Using third parties also eliminates potential bias which may be introduced by internal reviews.
- A scoring matrix tested in this review, can also add further contribute to readily comparable outcomes. It can also provide a basis for tracking and benchmarking Member performance on a periodic basis.
- Developing and adopting a defined procedure will ensure consistency and aid comparability both across reports (from Member to Member) and over time for the same Member. Since the QAR's are repeatable, CCSBT and its Members can chart progress and improvements in performance over time. This may be important for Developing status Members who may have a stronger desire to both measure and objectively, demonstrate performance improvements of the entire management system or Members which are actively improving key areas of their systems and wish to have specific MPR's assessed. Again, a scoring matrix for MPR's can support such activities.
- 2015 QAR's were conducted and documented in the local language which can enhance information flow during site audits and even respond to cultural nuances where audit teams include native speakers. However, and referring to weakness the challenges of dual language reporting were also encountered in this QAR.
- As noted previously, on-site audit is an accepted and reliable practice used for third party verification of systems and processes across all commercial business. It is also becoming a growing feature in non-commercial, government applications. Using on-site audit as a tool to support the Members of CCSBT to demonstrate their performance against MPR's is considered a strength to the existing Phase 1 desk top review procedure.

- Thorough communication to Members provided by CCSBT of the importance of facilitating the site visit again proved invaluable. On this occasion, FA provided a high level of support and flexibility in accommodating the audit schedule. This also included support with scheduling meetings with the various industry associations, and other government agencies which was made allowable under the CCSBT Terms of Reference for QARs once the Member had agreed to extend the audit to industry bodies. In the case of Japan, meetings with the main tuna associations were valuable in gaining a thorough insight into the operational side of the fishery and also corroborate information also received.
- On-site audits provide a far greater level of confirmation of the operational capability and consistency of application of systems and processes and therefore provide a good understanding of effectiveness.

3.2 Weaknesses (and Limitations/Risks Encountered)

There were a number of weaknesses and limitations encountered during the feasibility testing.

- The QAR Phase 2 for Japan was conducted and reported in Japanese. Earlier QAR's which had attempted dual and simultaneous drafting in native and English languages had proven cumbersome for review teams. For that reason, it was decided to conduct and report on this review in Japanese. The audit team included a native Japanese speaker and an auditor with basic Japanese which greatly contributed to the effectiveness of the site visit. However, the main challenge to this approach was that it limited the accessibility to the report for non-native speakers, such as the project lead and proved a costly translation. A recommendation is made based on this outcome.
- For this QAR, the extended timeframe of an additional one month (June and July) for Member review of the draft report also reduced the available time to complete the QAR in Japanese and then translate prior to finalising for both versions. However, this was likely a special feature only encountered on this occasion.
- Translation also proved challenging with respect to the definition of technical terms (certification, validation and verification) which have very prescriptive meaning and

definition for CCSBT MPR but may not be readily translated from a local language back to English.

4 Recommendations for Future QAR Development

The following recommendations for future QARs are based on the outcomes of the QAR processes conducted in 2015.

- The feasibility test of the scoring matrix provided sufficient positive outcome to warrant further development of this approach. Further development should include a review of the scoring guideposts for each set of elements and criteria and a consideration of applying a weighted score for more important MPR's and to differentiate good from poor outcomes. (Current application used scoring matrix of 1, 2, 3 where 1 is weaker than 2 is weaker than 3; an alternative method could consider 1 is weaker than 3 is weaker than 5 etc.).
- The use of a scoring matrix, either spreadsheet based or similar would allow the outcome of QAR's to be expressed numerically and still allow for the reporting of key evidence and information. It would also allow for comparability of scores across Members and allow benchmarking over time.
- A scoring matrix is consistent with ISO procedures and numeric scoring systems are applied to many third party audit applications, including for fisheries certifications such as Marine Stewardship Council.
- If desirable to CCSBT, the overall reporting format for QAR's could be re-designed around the scoring matrix and therefore reduce in size and become less wordy and more quantitative. Again, this may support access to report outcomes and comparability by readers.

Appendix 1: Procedure for Phase 1 Quality Assurance Reviews

(The following Phase 1 methodology is taken directly from 2013 "Final Report on the Overall Trial").

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 5 – Recommendations.

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.

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. 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.

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.

5. Appointment of Reviewers

Identification of Members and CNMs

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

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 Assessment Body 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.

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.

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 4.1 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)

6. 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.

7. 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.

8. 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.

9. 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.

10. 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.

11. 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

12. Consultation outside of the Member Management bodies

The terms of reference for the QAR process do NOT allow for consultation with nongovernmental 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.

[Procedural review 2015 where the Member agrees, extended consultation to industry and other parties can be undertaken on a case by case basis].

13. 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 to 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.

14. 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.

15. (Recommendation) Peer Review of Member QAR

The Assessment Body 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 Assessment Body shall notify the CCSBT of the proposed Peer Reviewer(s).

The Assessment Body 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.

16. 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.

17. 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 Phase 1 methodology flow chart



Appendix 2: Procedure for Phase 2 QARs

1. Scope (currently not up-dated to include Scoring Matrix)

This methodology description sets out the detailed procedure that an independent Assessment Body shall follow in order to conduct a Phase 2 Quality Assurance Review (QAR) of a Member or Cooperating Non-Member (CNM) of the Commission for the Conservation of Southern Bluefin Tuna (CCSBT) against selected Minimum Performance Requirements (MPRs) set out under Obligations of the CCSBT Compliance Policy Guideline 1.

A Phase 2 QAR can be undertaken either after a Phase 1 QAR has been completed or in combination, where a Member/CNM is assessed to both a Phase 1 and 2 QAR, concurrently.

For the purposes of document control, this current procedure can be referred to as QAR Phase 2 Procedure Version 1.0. A separate procedure was developed during Phase 1 QAR's. This is referred to As QAR Phase 1 Procedure Version 1.0. (Refer to Appendix).

2. Review Team

Review team members shall be appointed under the same conditions as Phase 1. (Refer to QAR Phase 1 Procedure Version 1.0). Where members of the review team are different from Phase 1, the Assessment Body shall ensure that Phase 2 members are thoroughly briefed on the outcome of Phase 1 QAR's and shall perform checks to ensure that the lead reviewer has fully incorporated the outcomes of Phase 1 into the scope and application of the site visit audit in Phase 2.

In particular, scope of the Phase 2 QAR shall include audit applications that focus on the Member Status as identified by CCSBT Terms of Reference.

From the Terms of Reference:

'In assessing the suitability of systems QARs will take into account the particular circumstances and characteristics of each Member being reviewed. QARs will also take into account any issues identified by the Compliance Committee. All QARs will provide an overall review of the Members monitoring, control and surveillance (MCS) systems however some areas may need particular attention based on the Members involved, including:

- *i)* **Market States** emphasis will be placed on the systems and processes in place to support requirements for the importation of SBT products;
- ii) **Farm States** emphasis will be placed on the systems and processes required for accurate reporting of catch, monitoring the introduction of SBT into farms including the effectiveness of the 100 fish sampling methodology and the harvesting of farmed SBT product;
- *Developing States* emphasis will be placed on the systems and processes in place required to monitor, manage and accurately report artisanal and industrial catch including to address Indonesia's request for consideration of its allocation; and

iv) **Distant Water Fishing States** – emphasis will be placed on the systems and processes in place for the accurate reporting of catch, recording/verifying of landing and/or transhipment and monitoring of direct exports of SBT.

Confirmation that the review team is sufficiently fluent in spoken and written language of both the Member and in English language. All correspondence with management agency staff and the site visit shall be conducted in the local language.

3. Phase 2 Review Process

Phase 2 of the QAR review process follows this series of steps:

- Review of the outcomes of Phase 1 (or QAR to date) and identification of essential and important areas to include in the site visit audit.
- Full briefing of the Review Team and appointment of the Lead Reviewer and support Reviewer.
- Development of a site visit, interview and testing plan based on the outcomes of Phase 1.
- A visit to the principal site(s) where the Member's main systems and processes are located, during which reviewers will:
 - Interview the key people involved in the operation of these systems and processes, and
 - review documentation including official records, reports and associated evidence
 - Examine and witness key operations either related to data management systems or operational practices (at sea or shore) that demonstrates the level of operational effectiveness of systems and processes designed to deliver the requirements of the CCSBT MPR's.
 - Ensuring sufficient recording of the meeting by way of comprehensive notes are taken.

After the site visit, the evidence obtained will be used as appropriate for:

- Confirmation of MPR performance outcomes and where necessary, modification of the process map and SWOT analysis obtained from Phase 1 (where Phase 1 and 2 were undertaken at separate times).
- Production of a gap analysis between Phase 1 and Phase 2 findings (where Phase 1 and 2 were undertaken at separate times).
- Development of recommendations for the overall Member QAR and preparation of a complete report according to the report template.

In addition to the specific actions listed above, the Project Lead Reviewer will provide support and guidance to all Reviewers throughout the review process as necessary. The Assessment Body QAR manager 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 and within the timeframe allocated.

4. Review Plan and Audit Schedules

The Review Plan shall be prepared by the Project Lead Reviewer alongside discussion with the appointed Review Team and where appropriate confirm details of the plan with CCSBT.

The site visit review plan shall identify the entities and key personnel within the management system that are to be included in the site audit. The scope should be broad enough to provide sufficient confidence to the review team of it succeeding in terms of evidence collection for QAR verification. Scope shall consider the specific status of the Member State and ensure that specific areas of management unique to this status are included in the audit.

Where the scope of the site visit extends beyond the agencies directly responsible for SBT management, the Lead Reviewer shall contact the principal management agency and inform them of the desire to extend the audit to include the additional areas. (Any provisions or discussions on reasons for the audit scope can be held prior to the visit).

Additional entities for inclusion in the site visit may include fishing associations, shore base operational activities, at sea operational activities, regional inspection or management agencies where there responsibilities are over segments of the fleet that encounter SBT.

A site visit plan shall be organized and used to schedule the various dates and site visit meetings. The schedule shall be the responsibility of the Lead Reviewer and confirmed in consultation with the Assessment Body manager.

The primary objective of the Review Plan is to finalise the following components of the review process:

- Agree the site visit requirements and plan the site visit, including:
 - Dates*, times and locations for site visits.
 - Management Organisations, key staff and any other associated agencies that are to be included in the audit.
 - Specific areas of audit and consultation based on the outcomes of Phase 1 or the review to-date.
- Agree and plan the roles and activities of individual Reviewers.
- Agree and plan the timelines and schedule for the review, including 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. (N.B these dates may be pre-determined by the CCSBT).
- *Dates for site visits should take into account requirements to witness certain activities associated with the scope of the audit that may be of a seasonal nature.
Where site visits require time at sea, the Review Lead should consider factoring sufficient time to account for inclement weather.

5. Audit Testing Plan for each Entity included in the Site Visit

A testing plan shall be developed for each entity included in the site visit including a list of questions or key areas for auditing. At its simplest, it may be an agenda for each meeting or more elaborate planning for at sea observations, lists of documents to be collected and reviewed. An outline schedule for each meeting with key agenda items shall be provided to each of the entities at least one week in advance of each meeting/consultation.

6. Site Visit Review Team

The site visit shall be conducted by two members of the review team; including the Lead Reviewer. As stated, both members shall be sufficiently fluent in the local language and where this is not the case, the review team leader and Assessment Body manager shall consider and provision for any special requirements to ensure that the site visit is effective (e.g. use of a local support translator).

7. Interviews and Consultation

Interviews can be held with individuals or with groups and can take the form of a consultation meeting. Questions should be structured in a logical flow and shall be objective and open in nature (i.e. requiring more that simple yes/no responses).

At all opportunity, the review team shall seek objective, documentary evidence and witness activities that substantiate the existence and effective implementation of systems. Consultations shall commence with an introduction and short presentation of the aims of the QAR and expectations of the meeting.

The outcome or close of meetings shall summarize any evidence reviewed and also any evidence that the auditee has offered to provide electronically post the meeting. The support reviewer shall take detailed notes / minutes of the meeting and also record the names, titles and contact details of those present. The meeting notes/minutes shall serve an accurate presentation of the meeting.

8. Post Audit Reporting

Information collected from the site visit shall be incorporated into the QAR template.

Generally, this will include:

- A summary table of the site visit schedule and the entities, including names of representatives met.
- Up-dates to each MPR with information and verification of the extent to which the Member meets each MPR.
- Up-dates and confirmation of the accuracy and completeness of the Member management system flow chart.
- A list of all documentary evidence and specimen forms collected.
- Additional and miscellaneous evidence including photographs of site visits
- A summary of the audit findings, strengths, weaknesses/threats and recommendations

The report shall be developed in the local language, although the review team and Assessment Body manager may consider an alternative approach such as developing the report in English followed by translation or simultaneous development of the report.

The rationale to the language for report development shall be based on achieving timely communication with the Member and ensuring the report is accurate and consistent across both languages.

9. Gap Analysis

Where Phase 1 and Phase 2 reviews were undertaken at distinctly different times (i.e. 1 year apart), a gap analysis using Phase 2 evidence outcomes shall be undertaken to verify the information and outcomes already documented in the previous Phase 1 review. (For the purposes of feasibility, this was conducted during the Australian Member Phase 2 review).

10. Peer Review of QAR report

The Assessment Body shall arrange for each QAR Report to be reviewed by a Peer Reviewer to undertake a quality and consistency review of the QAR. The Reviewers shall be competent in the relevant aspects of fishery management. As a minimum, the Peer Reviewer shall satisfy the key requirements of "Review Team Appointment" described in Phase 1 methodology 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 Assessment Body shall agree the timeframe for delivery of Peer Reviewed QARs.

Upon receipt of the Peer Reviewer written comments the Review Team shall consider each and every comment raised and make amendments to the QAR as deemed necessary. This may result in:

- Incorporation of changes into the QAR Report based on comments, new information or clarification provided during the Member review.
- No further changes to the Report based on the Review team's objective opinion.

(N.B The Review Team is not obliged to make amendments but is required to review all Peer Reviewer comments and decide on the course of action).

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

11. QAR Report Completion and Submission

The main outcome of the QAR 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 Assessment Body manager. All sections of the report should be fully referenced whenever appropriate. As previously described, where English is not the first language of the Member, the QAR shall be written in both the local and English language. Final QAR Reports shall be submitted within the timeframe identified in the Terms of Reference of the CCSBT or as otherwise agreed.

Appendix 3: Scoring Matrix for Japan- Feasibility Test

						Audit Outcomes					-			-		-			-
Conten ts	MPR Clause		Documentatio	n		Implementation			Effectiveness	5	Tota MPR	l eligible sc R	ore for ea	h		-	Jap	an Test	-
		1	2	3	1	2	3	1	2	3				I	Proce ss	Implementat ion	Effecti veness	Total	Comments
3.1.1	MPR 1 – "Rules in place to ensure that the total 'Attributable SBT Catch' of each Member does not exceed the Member's Allocated Catch for the relevant period."	Very little of the process is defined in documented procedures	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	Rules/syste ms not or only sparsely implemente d	Rules partially implemented	Full implementatio n according to the specified documentation	Member's reported 'Attributable SBT Catch' exceeds the Member's Allocated Catch	Member' s reported 'Attributa ble SBT Catch' has exceeded the Member' s Allocated Catch but is appropria tely addresse d and recorded to CCSBT's requirem ents.	Member's reported 'Attributable SBT Catch' does not exceed Member Allocated Catch		9			3	3	3	9	Japanese fishery operators require a license for pelagic fishing of bonito and tuna as well as a written fishing quota directive, issued by the Minister of Agriculture, Forestry and Fisheries; apportion individual allocations of non- transferable quotas by fishery operator and by fishing vessel; Fishery quotas may only be transferred between vessels (in possession of a SBT fishing quota) owned by the same fishery operator.
3.1.2	MPR 2a(i): [Operating systems and processes established to implement annual catching arrangements, including] Specification of allocations by company, quota holder or vessel	Very little of the process is defined in documented procedures	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearly defined rules in place with documentation sighted.	Rules/syste ms not or only sparsely implemente d	Rules partially implemented	Full implementatio n according to the specified documentation	Allocation documentati on does not reflect the reported catches	Minor discrepan cies noted when matching allocated documen tation with reported catches. Discrepan cies identified and clarified with supportin g records.	Specified allocations match the catch reporting associated with the Member State.		9			3	3	3	9	Under the RMTP, Japanese fishing vessels involved in SBT fishing must report the details of their catch daily throughout the fishing season. The reported data are compiled by the Japan Fisheries Information Service Center. Through the compiled database the Coordination Division of the Fisheries Agency monitors fishing conditions as a daily routine, so as to ensure that the attributable catch does not exceed the allocation limit.

Final C	verall Trial Re	port							CCSBT C	QAR							
3.1.3	MPR 2a (ii): [Operating systems and processes established to implement annual catching arrangements, including] Arrangements for daily recording of all catches	Very little of the process is defined in documented procedures	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT WRP in the form of legally binding rules. Clearly defined rules in place with documentation sighted.	Rules/syste ms not or only sparsely implemente d	Arrangements for daily recording of all catches partially implemented	Full implementatio n according to the specified documentation	Daily recording of all catches are not recorded	Daily recording of all catches. Discrepan cies noted when matching daily recording of catches.	Daily recording of all catches. Minor discrepancies noted when matching daily recording of catches. Discrepancies identified and clarified with supporting records.	9		3	2	2	7	 Information from the pelagic longline tuna fishing logbook may be used as reference if this is required for the verification of data. Since 2013, mutual verification has taken place with scientific observers. No obvious statistical discrepancies have been identified. This has occurred under the High- level Code of Practice for Scientific Data Verification Agreement of the CCSBT, and is not an ongoing arrangement.
3.1.4	MPR 2a (iii): [Operating systems and processes established to implement annual catching arrangements, including] Weekly reporting of catches by large scale tuna longliners and monthly reporting of catches by coastal fishing vessels.	Very little of the process is defined in documented procedures	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT WRP in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	Rules/syste ms not or only sparsely implemente d	Arrangements for weekly recording of all catches partially implemented	Full implementatio n according to the specified documentation	Weekly recording of all catches are not recorded	Weekly recording of all catches. Discrepan cies noted when matching daily recording of catches.	Weekly recording of all catches. Minor discrepancies noted when matching weekly recording of catches. Discrepancies identified and clarified with supporting records.	9		3	3	2	8	Mutual cross checking of log book arrangement with scientific observers (under the Code of Practice for Scientific Data Verification Agreement) is not an ongoing arrangement for compliance reasons. Reviewers were unclear of the consequences on the RTMP if this activity was discontinued. Effectiveness scores 2 since logbooks from LSTLV's faxed every 10 days which slightly conflicts with the reporting frequency of 'weekly'.
3.1.5	MPR 2b: [Operating systems and processes established to], in accordance with the CCSBT timeline, monitor all fishing-related mortality of SBT.	Very little of the process is defined in documented procedures	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	Rules/syste ms not or only sparsely implemente d	Arrangements for recording all fishing- related SBT mortalities partially implemented	Arrangements for recording all fishing-related SBT mortalities fully implemented as per specified documentation related to the requirements of the MPR.	All fishing- related SBT mortalities not recorded	Incomple te fishing- related mortality of SBT reported to CCSBT.	All fishing- related mortality of SBT is recorded in line with CCSBT's reporting timelines.	9		3	3	3	9	Although discard weights are estimated only, achieving a high survival rates is most likely the bigger objective rather than accurate live-weighing of SBT to be returned.

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3.1.6	MPR 2c: Ensure accuracy of the "Attributable SBT Catch", including (for fishing Members) a physical inspection regime of SBT caught by the Member's fishing vessel, and (for farming Members) monitoring the accuracy of the stereo video monitoring and adjusting/ re- calibrating where necessary.	Very little of the process is defined in documented procedures	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	Data checking process / auditing not implemente d.	Reports observed that demonstrate the data checking process / auditing is conducted by management that incorporate a part of the SBT fishery.	Reports observed that demonstrate the data checking process / auditing is conducted by management that incorporate the whole SBT fishery.	Data checking / auditing process does not exist to ensure accuracy if the "Attributabl e SBT Catch".	Data checking / auditing process exist but demonstr ate that there are inaccuraci es in the "Attributa ble SBT Catch".	Data checking / auditing process demonstrates that the "Attributable SBT Catch" is accurate.	9		3	3	2	8	Inspection based on vessel notification. Lower level of port monitoring at secondary ports.
3.1.7	MPR 3: All fishing- related SBT mortality is reported annually to the Extended Scientific Committee, for incorporation into stock assessment analysis, and to the Commission.	No documentati on / evidence of reports being submitted to CCSBT as specified by the MPR and associated CCSBT obligations	Reports submitted to CCSBT but outside of the timeframes required by CCSBT as specified by the MPR and associated CCSBT obligations	Reports submitted to CCSBT in accordance with the timeframes required by CCSBT as specified by the MPR and associated CCSBT obligations							3		3	NA	NA	3	

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MPR 4: Operating systems and processes applied to monitor compliance with annual catching arrangements, and impose sanctions or remedies where necessary.	No bin documentati opr evidence of sysy operating pla systems and processes in ion place con	onsistent ith CCSBT	Documentation consistent with CCSBT MPR in the form of legally binding rules, operating systems and processes. Clearing defined rules in place with documentation sighted.	Monitoring compliance with the control measures; and imposing of sanctions or corrective action programmes for any non- compliance detected not implemente d as specified by the MPR and associated CCSBT obligations	Demonstrable implementatio n of monitoring compliance with the control measures. The imposing of sanctions or corrective action programmes for any non- compliance detected not demonstrable as specified by the MPR and associated CCSBT obligations	Full implementatio n of monitoring compliance with the control measures, and imposing of sanctions or corrective action programmes for any non- compliance detected as specified by the MPR and associated CCSBT obligations	No monitoring compliance with the control measures; and imposing of sanctions or corrective action programmes for any non- compliance detected as specified by the MPR and associated CCSBT obligations	Data / evidence available to show monitorin g that monitorin g complian ce with the control measures but no data / incomplet e data available on imposing of sanctions or corrective action program mes for any non- complian ce detected as specified by the MPR and associate d CCSBT obligation s is conducte d.	Data / evidence available to show monitoring that monitoring compliance with the control measures; and imposing of sanctions or corrective action programmes for any non- compliance detected as specified by the MPR and associated CCSBT obligations is conducted.	9		3	2	3	8	There are differential patrols at the Ports of landings (although main Port covered adequately). There is no at sea inspection. However, there is no evidence presented that shows reduced effectiveness although the reviewers note the absence of any violation or imposition of penalties although not disputed, may be insufficient evidence to demonstrate that detection is totally effective.	
3.2 Allocations 2 (CCSBT Obligation 1.1(iii))																	

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3.2.1	MPR 1a: [Operating systems and processes must be in place to ensure that]An accurate, verified and robust figure for the final Attributable Catch is available before the notification to the Secretariat of the Carry-forward, and a report on the adoption and use of the carry- forward procedure is included in each annual report to the Extended Commission.	No documentati on / evidence of reports being submitted to CCSBT as specified by the MPR and associated CCSBT obligations	Reports submitted to CCSBT but outside of the timeframes required by CCSBT as specified by the MPR and associated CCSBT obligations	Reports submitted to CCSBT in accordance with the timeframes required by CCSBT as specified by the MPR and associated CCSBT obligations					3		3	NA	NA	3	Systems are in place; although possible weaknesses are outlined under other MPR's which may have an effect on the verification of the final reported catch. No evidence is available to cause a change from high scores under this MPR.
3.2.2	MPR 1b: The Executive Secretary is formally notified of the catch for the concluded quota year together with the available catch limit (Catch Allocation + carry- forward) for the new quota year within 60 days of the start of the new quota year.	No documentati on / evidence of reports being submitted to CCSBT as specified by the MPR and associated CCSBT obligations	Reports submitted to CCSBT but outside of the timeframes required by CCSBT as specified by the MPR and associated CCSBT obligations	Reports submitted to CCSBT in accordance with the timeframes required by CCSBT as specified by the MPR and associated CCSBT obligations					3		3	NA	NA	3	The data compiled by JAFIC are recompiled and analysed by the National Research Institute of Far Seas Fisheries, and are then made available at the CCSBT data exchange. On 30 May Japan formally reported its Member's Allocated Catch (2689 tonnes) + carry-over (54 tonnes) to the Commission.
3.3	Record of Authorised Carrier Vessels 1 (CCSBT Obligation 2.3(i) + (ii))	No documentati on / evidence of record of authorised carrier vessels as specified by the MPR and associated CCSBT obligations	Record of authorised carrier vessels kept but in accordance with the MPR and associated CCSBT obligations. Documentat ion sighted.	Comprehensive record of authorised carrier vessels in accordance with the MPR and associated CCSBT obligations. Documentation sighted.					3		3	NA	NA	3	Records complete. Posting of a carrier vessel carrying SBT from a licensed SBT fishing vessel to the list of registered carrier vessels (and published on the Fisheries Agency web page) will in fact, on the basis of Article 59 point 4 of the 'Ministerial Ordinance on the Permission, Regulation, Etc. of Designated Fisheries', license the transshipment; carrier vessels posted on this list are reported to CCSBT

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3.4	Record of Authorised Carrier Vessels 2 (CCSBT Obligation 2.3(iii))	No documentati on / evidence of record of authorised carrier vessels as specified by the MPR and associated CCSBT obligations	Record of authorised carrier vessels kept but in accordance with the MPR and associated CCSBT obligations. Documentat ion sighted.	Comprehensive record of authorised carrier vessels in accordance with the MPR and associated CCSBT obligations. Documentation sighted.							3		3	NA	NA	3	Records completed.
3.5	Catch Documentation System 1 (CCSBT Obligation 3.1 (i) – (v))																
3.5.1	MPR 1a: [Operating systems and processes established and implemented to ensure that] All owners and operators of authorised farms, fishing vessels, and carrier vessels, and all SBT processors, importers exporters and re- exporters, are aware of their CCSBT obligations.	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No implementat ion of operating systems and processes.	Partial implementatio n of operating systems and processes.	Full implementatio n of operating systems and processes.	No documentati on / evidence showing all owners and operators associated with SBT have been made aware of their requirement s as per the MPR.	Documen tation / evidence showing all owners and operators associate d with SBT have been made aware of their requirem ents as per the MPR. Evidence does not cover all validators	Comprehensi ve documentatio n / evidence showing all owners and operators associated with SBT have been made aware of their requirements as per the MPR.	9		3	3	3	9	Legal documents available permit process and obligations posted on website at the time of application for permit.

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MPR 1b: [Operating systems and processes established and implemented to ensure that] CD documents accompany SBT relevant, includ (i) a Catch Monitoring Forr (CMF) for all transhipments, landings of domestic produ exports, import and re-exports; a Re- export/Export After Landing of Domestic Produ (REEF) for all 3.5.2 exports of SBT landed as domestic produ then exported, and for all re- exports of imported SBT (a REEF must also accompanied by copy of the associated CMF and copies of ar previously issue REEFs for the SE being exported] and (iii) a Farm Transfer Form (FTF) for all transfers of SBT between authorised farm within the Member's jurisdiction;	t, ii) No documentati on / t evidence of rules, systems and procedures t being conducted as specified by the MPR vy e a /	Informal non-legally binding rules, systems and procedures in place. Documentat ion consistent with CCSBT MPR.	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	Data checking process of CDS documentati on not implemente d.	Reports observed that demonstrate the data checking process is conducted by management of CDS documentation	Reports observed that demonstrate the data checking process is conducted by management of CDS documentation	Member State unable to demonstrate examples where the correct use of CDS documents have been identified using their operating systems and processes.	Member State able to demonstr ate examples where the correct use of CDS documen ts have been identified using their operating systems and processes	Member State able to demonstrate examples where the correct use of CDS documents have been identified and resolutions to documentatio n queries has been conducted using their operating systems and processes.	9	3	3	3	9	holders of SBT as well as SBT fishery entrepreneurs/operators/c arriers, together with all those involved in the processing, importing, exporting or re-exporting of SBT are notified of their obligations associated with the SBT fishing industry and the handling of SBT catches via web pages and such when applying for a permit. No export permits will be issued without the prescribed forms.

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3.5.3	MPR1c: [Operating systems and processes established and implemented to ensure that] All entities with CDS certification obligations have certification requirements, including that the certifier for the Catch Tagging Form (CTF) should be the Vessel Master or other appropriate authority for any wild harvested SBT, and the Farm Operator or other appropriate authority for any farmed SBT.	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No or very sparse implementat ion of operating systems/pro cesses to monitor the requirement s of the CDS certification.	Partial implementatio n of operating systems/proces ses to monitor the requirements of the CDS certification.	Full implementatio n of operating systems/proces ses to monitor the requirements of the CDS certification.	Examples of the requirement s of the CDS certification not being met, such as non- authorised personnel being involved in CDS documentati on.	Examples of the requirem ents of the CDS certificati on not being met, such as non- authorise d personnel being involved in CDS documen tation, but evidence of the Member State addressin g this as required.	No examples of the requirements of the CDS certification not being met, such as non- authorised personnel being involved in CDS documentatio n.	9		3	3	3	9	The Catch Tagging Form must be signed by the vessel's master or chief fisherman, and by an authorized representative of the Fishery Agency
3.5.4	MPR 1d: [Operating systems and processes established and implemented to ensure that] All entities involved in towing and farming SBT have procedures to (i) record the daily mortality of SBT during catching and towing, and the quantity (number and weight in kilograms) of SBT transferred to each farm; and (ii) use these records to complete the Farm Stocking Form at the end of each fishing season and before the SBT are recorded on a CMF.	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules, systems and procedures in place. Documentat ion consistent with CCSBT MPR.	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No or very sparse operating systems / processes related to the requirement s of the MPR implemente d.	Operating systems / processes related to the requirements of the MPR partially implemented.	Operating systems / processes related to the requirements of the MPR fully implemented.	Member State unable to provide catch records and Farm Stocking Forms as required by the MPR.	Member State able to provide catch records and Farm Stocking Forms but inconsiste ncies are apparent within the data.	Member State able to provide catch records and Farm Stocking Forms.	N/A		NA	NA	NA	0	Japan does not farm SBT.

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3.5.5	MPR 1e: [Operating systems and processes established and implemented to ensure that] Compliance with certification procedures is verified.	No documentati on / evidence of operating systems and processes in place	Informal non-legally binding rules, operating systems and processes in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules, operating systems and processes. Clearing defined rules in place with documentation sighted.	Monitoring compliance with the certification procedures; and imposing of sanctions or corrective action programmes for any non- compliance detected not implemente d as specified by the MPR and associated CCSBT obligations	Demonstrable implementatio n of monitoring compliance with the certification procedures. The imposing of sanctions or corrective action programmes for any non- compliance detected not demonstrable as specified by the MPR and associated CCSBT obligations	Full implementatio n of monitoring compliance with the certification procedures, and imposing of sanctions or corrective action programmes for any non- compliance detected as specified by the MPR and associated CCSBT obligations	No compliance monitoring and imposing of sanctions or corrective action programmes for any non- compliance detected as specified by the MPR and associated CCSBT obligations	Data / evidence available to show monitorin g that monitorin g that monitorin g complian ce with the certificati on data / incomplet e data available on imposing of sanctions or corrective action program mes for any non- complian ce detected as specified by the MPR and associate d CCSBT obligation s is conducte d.	Data / evidence available to show monitoring compliance with the certification procedures; and imposing of sanctions or corrective action programmes for any non- compliance detected as specified by the MPR and associated CCSBT obligations is conducted.	9	3	3	3	9	Verification is carried out by officials at FA registered with CCSBT

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3.5.6	MPR 2: Any use of specific exemptions to CDS documentation (allowed for under obligation 3.1 A (ii) for recreational catch) must be (a) explicitly allowed and this decision advised to the Executive Secretary; and (b) have associated documented risk- management strategies to ensure that associated mortalities are accounted for and that recreational catches do not enter the market.	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules, systems and procedures in place. Documentat ion consistent with CCSBT MPR.	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No or very sparse operating systems / processes related to the requirement s of the MPR implemente d.	Operating systems / processes related to the requirements of the MPR partially implemented.	Operating systems / processes related to the requirements of the MPR fully implemented.	Incidences where CDS documentati on has been used for recreational catch without specific permission and no assurances that recreational catches do not enter the market.	Member State able to demonstr ate incidence s where CDS documen tation has been used for recreatio nal catch with specific permissio n and a risk based framewor k demonstr ated to ensure that recreatio nal catches do not enter the market.	Member State able to demonstrate incidences where CDS documentatio n has been used for recreational catch with specific permission and a risk based framework demonstrate d to ensure that recreational catches do not enter the market.	N/A		NA	NA	NA		No exceptions necessary or applied other than 3.7. There is no recreational fishing for SBT.
3.5.7	MPR 3: Operating systems and processes established and implemented to ensure all CDS documents are uniquely numbered and completed fully and in accordance with the document's instructions.	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No or very sparse implementat ion of operating systems/pro cesses to ensure all CDS documents are uniquely numbered and completed fully and in accordance with the document's instructions.	Partial implementatio n of operating systems/proces ses to ensure all CDS documents are uniquely numbered and completed fully and in accordance with the document's instructions.	Full implementatio n of operating systems/proces ses to ensure all CDS documents are uniquely numbered and completed fully and in accordance with the document's instructions.	Examples of CDS form where CDS forms are not unique and have not been fully completed	Examples of CDS form where CDS forms are not unique and have not been fully complete d, but evidence of the Member State addressin g this and amending documen tation as required.	No examples of CDS forms where CDS forms are not unique and/or have not been fully completed	9		3	3	3	9	The CMF must contain the ship's call sign and the form's unique numbers, including the serial numbers showing the order of catch. Once the process is completed, the CMF is collected by the Fishery Agency, where the completed form and the total attributable catch are compared and collated with other catch data
3.6	Catch Documentation System 2 (CCSBT Obligation 3.1 (vi))																

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3.6.1	MPR 1: Operating systems and processes established and implemented to ensure that at all times only carrier vessels authorised on the CCSBT Record of Carrier Vessels for the transhipment date are permitted to receive at-sea transhipments from the Member's LSTLVs.	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No or very sparse implementat ion of operating systems/pro cesses to monitor the authorised carrier vessel list.	Partial implementatio n of operating systems/proces ses to monitor the authorised carrier vessel list.	Full implementatio n of operating systems/proces ses to monitor the authorised carrier vessel list.	Examples of transhipmen ts being conducted by carrier vessels that are not on the authorised carrier vessel list	Examples of tranship ments being conducte d by carrier vessels that are not on the authorise d carrier vessel list, but evidence of the Member State addressin g this as required.	No examples of transhipment s being conducted by carrier vessels that are not on the authorised carrier vessel list	9	3	3	3	9	Transhipment vessels are registered. Observers in place- sign and return CMF/CTF report, vessel registration included- sent to FA.
3.6.2	MPR 2: Rules established and implemented to prohibit (a) the landing, transhipment, import, export or re-export of SBT caught or transhipped by non-authorised fishing/carrier vessels, and (b) the transfer of SBT to, between or harvested from farms which were not authorised to farm SBT on the date(s) of the transfers/ harvests.	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	Noor very sparse implementat ion of operating systems/pro cesses to monitor the authorised fishing/ carrier vessels and farms.	Partial implementatio n of operating systems/proces ses to monitor the authorised fishing/ carrier vessels and farms.	Full implementatio n of operating systems/proces ses to monitor the authorised fishing/ carrier vessels and farms.	Examples of activity conducted by fishing/ carrier vessels and farms that are prohibited to conduct activities as per the MPR	Examples of tranship ments being conducte d fishing/ carrier vessels and farms that are prohibite d to conduct activities as per the MPR, but evidence of the Member State addressin g this as required.	No examples of transhipment s being conducted by fishing/ carrier vessels and farms that are prohibited to conduct activities as per the MPR	9	3	3	3	9	When SBT transhipment from a domestic vessel is reported before the event, the CMF/CTF forms received from the Fishery Agency together with the vessel's registration and permit numbers are signed by the observers. After the transhipping, the transhipping, the transhipment report, containing the observers' signatures and the vessels' registration numbers, is forwarded to the Fishery Agency.
3.7	Catch Documentation System 3 (CCSBT Obligation 3.1 (vii) – (ix))															

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3.7.1	MPR 1: The Executive Secretary shall, in consultation with Members, determine whether proposed modifications are minimal or significant with respect to this obligation.		Modified documents are noted but not available for review.	Modified documents are available and evidenced.						3		3	NA	NA	3	Since at landing multiple buyers may become first recipients of the catch from a single vessel, the recipient lines in the domestic sale section on the form have been increased, in order to enable all buyers to be recorded onto a single CMF. Japan notified the Executive Secretary on 13 January 2015 that this will be applied to CDS and CTF from April 2015. The office accordingly circulated the amended contents to its members on 19 January.
3.7.2	MPR 2: Modified documents remain compatible with approved forms to ensure data series remain continuous and so they can be uploaded by the Secretariat.				Not always consistent	Always consistent				3		NA	3	NA	3	
3.7.3	MPR 3: Modified documents are provided to the Executive Secretary in electronic format at least 4 weeks prior to the use of such documents and with proposed modifications clearly highlighted.						Modified documents are not submitted to CCSBT as specified by the MPR and associated CCSBT obligations	Modified documen ts submitte d to CCSBT but can be outside of the outside of the surrefram es required by CCSBT as specified by the MPR and associate d CCSBT obligation S	Modified documents submitted to CCSBT in accordance with the timeframes required by CCSBT as specified by the MPR and associated CCSBT obligations	3		NA	NA	3	3	Changes to CMF extended so that multiple buyer lines can be added for one shipment. Japan informed the Executive Secretary of the application of this modification to CDS and CTF from April 2015 by electronic means about 2½ months earlier, on 13 January. The Executive Secretary accordingly circulated the amended contents to its members on 19 January
3.8	Catch Documentation System 4 (CCSBT Obligation 3.1 (x) - (xii))							~								

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3.8.1	MPR 1(a): [Operating systems and processes established and implemented to ensure that CCSBT Catch Tagging Program requirements are met, including] Ensuring all SBT tags meet the minimum specifications in paragraph s of appendix 2 of the CDS Resolution.	Very little of the process is defined in documented procedures	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No or very sparse implementat ion of operating systems and processes.	Partial implementatio n of operating systems and processes.	Full implementatio n of operating systems and processes.	Incidences where SBT tags not meeting the minimum specification s have been used.	Incidence s where SBT tags not meeting the minimum specificati ons have been used, but this has been identified and resolved in accordan ce with CCSBT MPR requirem ents.	No incidences where SBT tags not meeting the minimum specifications have been used.	9		3	3	3	9	Tags are consistent with Resolution. Tags are ordered from one supplier.
3.8.2	MPR 1(b): [Operating systems and processes established and implemented to ensure that CCSBT Catch Tagging Program requirements are met, including] recording the distribution of SBT tags to (i) entities authorised to fish for, or farm, SBT; and (ii) where applicable, entities which received tags to cover exceptional circumstances.	No documentati on / evidence of record of distributed tags as specified by the MPR and associated CCSBT obligations	Record of distributed tags kept but in accordance with the MPR and associated CCSBT obligations. Documentat ion sighted.	Comprehensive record of distributed tags in accordance with the MPR and associated CCSBT obligations. Documentation sighted.							3		3	NA	NA	3	Tags distribution maintained by fishing associations.

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3.8.3	MPR 1(c): [Operating systems and processes established and implemented to ensure that CCSBT Catch Tagging Program requirements are met, including] requiring a valid tag to be attached to each SBT brought on board a fishing vessel and killed (including SBT caught as incidental bycatch) or landed and killed from a farm.	Very little of the process is defined in documented procedures	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No or very sparse implementat ion of operating systems and processes.	Partial implementatio n of operating systems and processes.	Full implementatio n of operating systems and processes.	Incidences where SBT tags not attached to SBT as per the MPR requirement S	Incidence s where SBT tags not attached to SBT as per the MPR requirem ents, but this has been identified and resolved in accordan ce with CCSBT MPR requirem ents.	No incidences where SBT tags SBT tags not attached to SBT as per the MPR requirements	9		3	3	3	9	In article 58 of the 'Ministerial Ordinance on the Permission, Regulation, Etc. of Designated Fisheries', the Fishery Agency has made it compulsory to apply proper tags for SBT. In accordance with this directive, fishery associations manage and supervise compliance
3.8.4	MPR 1(d): [Operating systems and processes established and implemented to ensure that CCSBT Catch Tagging Program requirements are met, including] requiring tags to be attached to each fish as soon as practicable after the time of kill.	Very little of the process is defined in documented procedures	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No or very sparse implementat ion of operating systems and processes.	Partial implementatio n of operating systems and processes.	Full implementatio n of operating systems and processes.	Incidences where SBT tags not attached to SBT as per the MPR requirement s	Incidence s where SBT tags not attached to SBT as per the MPR requirem ents, but this has been identified and resolved in accordan ce with CCSBT MPR requirem ents.	No incidences where SBT tags SBT tags not attached to SBT as per the MPR requirements	9		3	3	3	9	Rules set by Fishery Agency, the physical condition of a SBT when caught must be checked before freezing. Article 58 of the Ministerial Ordinance on the Permission, Regulation of Designated Fisheries prescribes application of a tag showing the vessel's call sign and a serial number in the order of catch to each SBT in order of being caught.

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3.8.5	MPR 1(e): [Operating systems and processes established and implemented to ensure that CCSBT Catch Tagging Program requirements are met, including] requiring details for each fish to be recorded as soon as practicable after the time of kill including month, area, method of capture, as well as weight and length measurements carried out before the SBT is frozen.	Very little of the process is defined in documented procedures	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No or very sparse implementat ion of operating systems and processes.	Partial implementatio n of operating systems and processes.	Full implementatio n of operating systems and processes.	Incidences where SBT details not recorded as soon as practicable possible as per the MPR requirement s	Incidence s where SBT details not recorded as soon as practicabl e possible, but this has been identified and resolved in accordan ce with CCSBT MPR requirem ents.	Incidences where SBT details not recorded as soon as practicable possible as per the MPR requirements	9		3	3	3	9	Same information as that on the tag (compliant with MPR 1e is written on a sheet of paper that is attached to the fish, in order to facilitate reading the information for each fish at a glance.
3.9	Catch Documentation System 5 (CCSBT Obligation 3.1 (xiii) - (xviii))																
3.9.1	MPR 1: Operating systems and processes established and implemented to (a) meet procedural and information standards set out in appendix 2 of the CDS resolution; (b) identify any unauthorised use of SBT tags; (c) identify any use of duplicate tag numbers; (d) identify any whole SBT landed, transhipped, exported, or re- exported without a tag; (e) ensure that tags are retained on whole SBT to at least the first point of sale for landings of domestic product; and (f) ensure a risk management strategy (including random or risk based sampling) is in place to	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules, systems and procedures in place. Documentat ion consistent with CCSBT MPR.	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No or very sparse operating systems / processes related to the requirement s of the MPR implemente d.	Operating systems / processes related to the requirements of the MPR partially implemented.	Operating systems / processes related to the requirements of the MPR fully implemented.	Member State unable to demonstrate examples where discrepancie s and accuracy of CDS documents have been identified using their operating systems and processes, enabling inconsistenci es in data to be addressed.	Member State able to demonstr ate examples where discrepan cies and accuracy of CDS documen ts have been identified using their operating systems and processes	Member State able to demonstrate examples where discrepancies and accuracy of CDS documents have been identified and resolved using their operating systems and processes. Risk based framework demonstrate d.	9		3	2	3	8	whilst systems were implemented, there was ambiguity on behalf of operators of the need to tag imported dressed SBT

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minimise the opportunity of illegal SBT being marketed.				

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3.9.2	MPR 2 Operating systems and processes established and implemented to (a) monitor compliance by operators with control measures in section 3.9.1, above; (b) impose sanctions on operators where non-compliance is detected; and (c) report any cases of whole SBT being landed without tags to the Executive Secretary, and minimise their occurrence in future.	No documentati on / evidence of operating systems and processes in place	Informal non-legally binding rules, operating systems and processes in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules, operating systems and processes. Clearing defined rules in place with documentation sighted.	Monitoring compliance with the control measures; and imposing of sanctions or corrective action programmes for any non- compliance detected not implemente d as specified by the MPR and associated CCSBT obligations	Demonstrable implementatio n of monitoring compliance with the control measures. The imposing of sanctions or corrective action programmes for any non- compliance detected not demonstrable as specified by the MPR and associated CCSBT obligations	Full implementatio n of monitoring compliance with the control measures, and imposing of sanctions or corrective action programmes for any non- compliance detected as specified by the MPR and associated CCSBT obligations	No compliance monitoring and imposing of sanctions or corrective action programmes for any non- compliance detected as specified by the MPR and associated CCSBT obligations	Data / evidence available to show monitorin g that monitorin g complian ce with the control measures but no data / incomplet e data available on imposing of sanctions or corrective action program mes for any non- complian ce detected as specified by the MPR and associate d CSBT obligation s is conducte d	Data / evidence available to show monitoring that monitoring compliance with the control measures; and imposing of sanctions or corrective action programmes for any non- compliance detected as specified by the MPR and associated CCSBT obligations is conducted.	9		3	3	3	9	Possible ambiguity noted in 3.9.1. Monitoring systems by FA are implemented and there is no evidence of non-compliance or non- compliance detection.
3.1	Catch Documentation System 6 (CCSBT Obligation 3.1 (xix) - (xxi))																
3.10.1	MPR 1a: [Operating systems and processes established and implemented to] Authorise validators to validate Farm Stocking, Catch Monitoring and Re-Export/Export after Landing of Domestic Product Forms.	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR.	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No or very sparse implementat ion of operating systems and processes.	Partial implementatio n of operating systems and processes.	Full implementatio n of operating systems and processes.				6		3	3	NA	6	Japan is not a farming state. Validation procedures for CDS - catch monitoring as well as for re-exporting or exporting landed domestic products are available and validation is by a representative of the Fishery Agency

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3.10.2	MPR 1b: [Operating systems and processes established and implemented to] Demonstrate that all persons with authority to validate CDS documents are (i) government officials or other individuals who have been duly delegated authority to validate; (ii) are aware of their responsibilities, including inspection, monitoring and reporting requirements; and (iii) are aware of the penalties applicable should the authority be misused.	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR.	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No or very sparse implementat ion of operating systems and processes.	Partial implementatio n of operating systems and processes.	Full implementatio n of operating systems and processes.	No documentati on / evidence showing validators have been made aware of their requirement s as per the MPR.	Documen tation / evidence showing validators have been made aware of their requirem ents as per the MPR. Evidence does not cover all validators	Comprehensi ve documentatio n / evidence showing all validators have been made aware of their requirements as per the MPR.	9		3	3	3	9	Procedures for catch monitoring as well as for re-exporting or exporting landed domestic products are certified and signed for by a representative of the Fishery Agency. Such representatives perceive this responsibility and the measures in connection with misuse of authority within a civil servant system. All transshipment observers who sign CMFs are aware of their individual responsibility as a result training exercises prior to dispatch
3.10.3	MPR 1c: [Operating systems and processes established and implemented to] Appropriate individuals certify each CDS form type by each signing and dating the required fields.	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No or very sparse implementat ion of operating systems/pro cesses that monitor CDS form completion is conducted by authorised individuals.	Partial implementatio n of operating systems/proces ses that monitor CDS form completion is conducted by authorised individuals	Full implementatio n of operating systems/proces ses that monitor CDS form completion is conducted by authorised individuals.	Examples of CDS form where CDS forms are not completed by authorised individuals	Examples of CDS form where CDS forms are not complete d by authorise d individual s, but evidence of the Member State addressin g this and amending documen tation as required.	No examples of CDS form where CDS forms are not completed by authorised individuals	9		3	3	3	9	No evidence of incorrectly certified CDS forms.

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3.10.4	MPR 1d: [Operating systems and processes established and implemented to] The same individual does not both certify and validate information on the same CDS form	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No or very sparse implementat ion of operating systems/pro cesses that monitor CDS form completion is conducted by authorised individuals.	Partial implementatio n of operating systems/proces ses that monitor CDS form certification and validation	Full implementatio n of operating systems/process ses that monitor CDS form certification and validation	Examples of CDS form where certification and validation are conducted by the same individual	Examples of CDS form where certificati on and validation are conducte d by the same individual , but evidence of the Member State addressin g this and amending documen tation as required.	No examples of CDS form where certification and validation are conducted by the same individual	9		3	3	3	9	All catch monitoring forms are collected and checked for signatures from appropriate representatives. Validation is by official FA staff that does not perform certification of the CDS forms.
3.10.5	MPR 1e: [Operating systems and processes established and implemented to] Inform the Executive Secretary of (i) the details for all validators and keep this information up to date; and (ii) of any individuals removed from the list of validators no later than the end of the quarter in which the removal occurred.	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules, systems and procedures in place. Documentat ion consistent with CCSBT MPR.	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No or very sparse implementat ion of operating systems/pro cesses that monitor validator status.	Partial implementatio n of operating systems/proces ses that monitor validator status. Documentation not kept up to date.	Implementatio n of operating systems/proces ses that monitor validator status. All validator status kept up to date.				6		3	3	NA	6	The Fishery Agency annually draws up a list of validators and routinely sends updates to CCSBT. In addition, each change is reported to government representatives in charge of SBT management.
3.10.6	MPR 1f: [Operating systems and processes established and implemented to] Ensure that no individual conducts validations (i) prior to the Executive Secretary being fully informed of his/her current validation details, or (ii) after that individual's authority to validate has been removed.	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules, systems and procedures in place. Documentat ion consistent with CCSBT MPR.	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No or very sparse implementat ion of operating systems/pro cesses that monitor validator status.	Partial implementatio n of operating systems/proces ses that monitor validator status. Documentation not kept up to date.	Implementatio n of operating systems/proces ses that monitor validator status. All validator status kept up to date.	Validations conducted by non authorised validators	100% of validation s conducte d by authorise d validators	100% of validations conducted by authorised validators. Validator status reports submitted to Executive Secretary and version control monitoring changes maintained.	9		3	3	3	9	Only official registered validators are allowed under the procedure to conduct validation activities. A clear organizational structure exists with roles and responsibilities defined for all staff to ensure that only Government officials involved in SBT management and reporting are engaged in SBT CDS activities and only certain individuals can receive reports from the CCSBT Executive Secretary.

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3.10.7	MPR 2 Operating systems and processes established and implemented to monitor performance (compliance and effectiveness) of validators.	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules, systems and procedures in place. Documentat ion consistent with CCSBT MPR.	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No or very sparse implementat ion of operating systems/pro cesses that monitor validator performance	Partial implementatio n of operating systems/proces ses that monitor performance of validators.	Implementatio n of operating systems/proces ses that monitor performance of validators. All validators monitored with comprehensive performance review.	Member State unable to demonstrate examples of monitoring performance of validators using their operating systems and processes.	Member State able to demonstr ate examples of monitorin g performa nce of validators using their operating systems and processes	Member State able to demonstrate examples of monitoring performance of validators. Member State able to provide examples of compliance and effectiveness of validators using their operating systems and processes.	9		3	3	3	9	Performance of validators occurs through direct management and internal reporting systems of the FA.
3.11	Documentation System 7 (CCSBT Obligation 3.1 (xxii) - (xxv))																
3.11.1	MPR 1a: [Operating systems and processes established to ensure] CDS forms are only validated (i) where all the SBT listed on the form are tagged (except in cases where tags are no longer required due to processing having occurred); (ii) in the case of farmed SBT, for SBT harvested from farms on a date that the farm was authorised on the CCSBT record of Authorised Farms; and (iii) in the case of Wild Harvest SBT, for SBT taken by FVs on a date when that FV was authorised by the flag Member.	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules, systems and procedures in place. Documentat ion consistent with CCSBT MPR.	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No or very sparse implementat ion of operating systems/pro cesses that monitor correct validation processes have been conducted.	Partial implementatio ns of operating systems/proces ses that monitor correct validation processes have been conducted.	Implementatio ns of operating systems/proces ses that monitor correct validation processes have been conducted.	Member State unable to demonstrate examples of monitoring correct validation processes have been conducted using their operating systems and processes.	Member State able to demonstr ate examples of monitor correct validation processes have been conducte d using their operating systems and processes and subseque nt identifica tion of any deficienci es or discrepan cies within the associate d CDS form.	Member State able to demonstrate examples of monitor correct validation processes have been conducted using their operating systems and processes and subsequent identification of any deficiencies or discrepancies within the associated CDS form. Member State able to demonstrate reconciliation of these discrepancies.	9		3	3	3	9	With regard to the domestic portion of the catch, in addition to checking CMF and CTF, Government representatives confirm as part of verification whether tags are applied to all landed SBT.

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3.11.2	MPR 1b: [Operating systems and processes established to ensure] validated documentation accompanies all SBT consignments whether transhipped, landed as domestic product, exported, or re- exported, or re- exported, or re- exported without validation documentation.	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules, systems and procedures in place. Documentat ion consistent with CCSBT MPR.	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No or very sparse implementat ion of operating systems/pro cesses that monitor correct validation processes have been conducted.	Partial implementatio ns of operating systems/proces ses that monitor correct validation processes have been conducted.	Implementatio ns of operating systems/process ses that monitor correct validation processes have been conducted.	Member State unable to demonstrate examples of monitoring correct validation processes have been conducted using their operating systems and processes.	Member State able to demonstr ate examples of monitor correct validation processes have been conducte d using their operating systems and processes and subseque nt tion of any deficienci es or discrepan cies within the associate d CDS form.	Member State able to demonstrate examples of monitor correct validation processes have been conducted using their operating systems and processes and subsequent identification of any deficiencies or discrepancies within the associated CDS form. Member State able to demonstrate reconciliation of these discrepancies.	9	3	3	3	9	Systems are in place both for domestic and transhipped product CDS validation. No evidence of non-compliance and no cases of violations or sanctions.	

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3.11.3	MPR 1d: [Operating systems and processes established to ensure] Validation does not occur where (i) validator authorisation procedures were not correctly followed or (iii) any deficiency or discrepancy is found with the CDS form.	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules, systems and procedures in place. Documentat ion consistent with CCSBT MPR.	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No or very sparse implementat ion of operating systems/pro cesses that monitor correct validation processes have been conducted.	Partial implementatio n of operating systems/proces ses that monitor correct validation processes have been conducted.	Implementatio n of operating systems/proces ses that monitor correct validation processes have been conducted.	Member State unable to demonstrate examples of monitoring correct validation processes have been conducted using their operating systems and processes.	Member State able to demonstr ate examples of monitor correct validation processes have been conducte d using their operating systems and processes and subseque nt tion of any deficienci es or discrepan cies within the associate d CDS form.	Member State able to demonstrate examples of monitor correct validation processes have been conducted using their operating systems and processes and subsequent identification of any deficiencies or discrepancies within the associated CDS form. Member State able to demonstrate reconciliation of these discrepancies.	9	3	3	3	9	Validation procedures are in place and alongside training and careful staff management (Of the registered validators); this ensures that procedures are correctly followed. Verification is carried out routinely to confirm that CDS documentation is accurate and correctly documented and validated.

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3.11.4	MPR 2a: [Operating systems and processes established and implemented for a Member to validate SBT product against CDS documents, including] requirements to check accuracy of information by ensuring every CDS document is complete, valid and contains no obviously incorrect information by cross-checking data on the form being validated against (1) data on preceding CDS forms including the Catch Tagging Form; (2) relevant lists of authorised farms, vessels or carriers; and (3) result of any physical inspection by the authority.	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules, systems and procedures in place. Documentat ion consistent with CCSBT MPR.	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	Data checking process / auditing of CDS documentati on not implemente d.	Reports observed that demonstrate the data checking process / auditing is conducted by management of CDS documentation	Reports observed that demonstrate the data checking process / auditing is conducted by management of CDS documentation	Member State unable to demonstrate examples where discrepancie s and accuracy of CDS documents have been identified using their operating systems and processes.	Member State able to demonstr ate examples where discrepan cies and accuracy of CDS documen ts have been identified using their operating systems and processes	Member State able to demonstrate examples where discrepancies and accuracy of CDS documents have been identified and resolved using their operating systems and processes.	9		3	3	3	9	CMF and CTF presented by fishery operators are checked by Fishery Agency employees in person, and signed. The list of vessels with legal permits ('Positive list') and the Allotted Catch and the RTMP are also consulted as part of this process. All entries on the CDS are then checked after landing.
3.11.5	MPR 2b: [Operating systems and processes established and implemented for a Member to validate SBT product against CDS documents, including] notification of any inconsistencies or inaccuracies to the Member's enforcement authorities.	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No or very sparse implementat ion of operating systems/pro cesses that identify discrepancie s as per the MPR requirement S.	Only partial implementatio n of operating systems/proces ses that identify discrepancies as per the MPR requirements.	Implementatio n of operating systems/proces ses that identify discrepancies as per the MPR requirements.	Member State unable to demonstrate examples where discrepancie s have been identified using their operating systems and processes.	Member State able to demonstr ate examples where discrepan cies have been identified using their operating systems and processes	Member State able to demonstrate examples where discrepancies have been identified and resolved using their operating systems and processes.	9		3	3	3	9	No inconsistencies have been identified.
3.12	Catch Documentation System 8 (CCSBT Obligation 3.1 (xxvi))																

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3.12.1	MPR 1: Documents and/or scanned electronic copies stored in a secure location for a minimum of three years under conditions that avoid damage to the legibility of the documents or the data files.	No documentati on / evidence of scanned electronic copies stored as specified by the MPR and associated CCSBT obligations	Documentat ion / evidence of scanned electronic copies stored. No evidence to demonstrate the storing of data for three years as specified by the MPR and associated CCSBT obligations	Documentation / evidence of scanned electronic copies stored consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.					3		3	NA	NA	3	Secure location. Six years for hard copies.
3.13	Catch Documentation System 9 (CCSBT Obligation 3.1 (xxvii) + (xxviii))														
3.13.1	MPR1: Copies of all completed CDS documents issued by catching Members or received by importing or receiving Members, sent to Executive Secretary in accordance with timeframes specified in the CCSBT documentation.	No documentati on / reports being submitted to CCSBT as specified by the MPR and associated CCSBT obligations	Reports submitted to CCSBT but outside of the timeframes required by CCSBT as specified by the MPR and associated CCSBT obligations	Reports submitted to CCSBT in accordance with the timeframes required by CCSBT as specified by the MPR and associated CCSBT obligations					3		3	NA	NA	3	Evidence demonstrates that Japan issues copies of CDS promptly and within prescribed deadlines
3.13.2	MPR2: Catch Tagging Form information shall be provided to the Executive Secretary using the electronic Data Provision Form developed by the Secretariat and in accordance with the Data Provision Form's instructions.	No documentati on / evidence of reports being submitted to CCSBT as specified by the MPR and associated CCSBT obligations	Reports submitted to CCSBT but outside of the timeframes required by CCSBT as specified by the MPR and associated CCSBT obligations	Reports submitted to CCSBT in accordance with the timeframes required by CCSBT as specified by the MPR and associated CCSBT obligations					3		3	NA	NA	3	Japan submits data via email using the prescribed electronic format downloaded from the CCSBT web site (Excel Files)
3.14	Catch Documentation System 10 (CCSBT Obligation 3.1 (xxix) + (xxxi))														

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3.14.1	MPR 1: Operating systems and processes established and implemented to (a) assign unambiguous responsibility to individuals or institutions for implementing verification procedures; and (b) ensure no verification procedure is carried out for a CDS document by an individual who has validated or certified the same CDS document.	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No or very sparse implementat ion of operating systems/pro cesses that monitor CDS form completion is conducted by authorised individuals.	Partial implementatio n of operating systems/proces ses that monitor CDS form completion is conducted by authorised individuals	Full implementatio n of operating systems/proces ses that monitor CDS form completion is conducted by authorised individuals.	Examples of CDS form where CDS forms are not completed by authorised individuals	Examples of CDS form where CDS forms are not complete d by authorise d individual s, but evidence of the Member State addressin g this and amending documen tation as required.	No examples of CDS form where CDS forms are not completed by authorised individuals	9	3	3	3	9	Processes and organisation of staff at FA in place to ensure that validation and verification are conducted by separate individuals.
3.14.2	MPR 2a: [Operating systems and processes established and implemented for verification, including] Selecting and inspecting, where appropriate, a targeted sample of vessels and export, import and market establishments based on risk. The intent of these inspections should be to provide confidence that the provisions of the CDS are being complied with.	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR with documentati on outlining an inspection regime.	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place for a risk based inspection regime with documentation sighted.	Inspection regime of vessels and export, import and market establishme nts based not implemente d.	Inspection regime of vessels and export, import and market establishments conducted	Risk based inspection regime of vessels and export, import and market establishments conducted	Member State unable to demonstrate inspections of vessels and export, import and market establishme nts being conducted as per the MPR requirement S	Member State able to demonstr ate inspectio ns of vessels and export, import and market establish ments being conducte d as per the MPR requirem ents	Member State able to demonstrate risk based inspections of vessels and export, import and market establishmen ts being conducted as per the MPR requirements	9	3	3	3	9	Investigations are conducted into the disguising of imported, domestically produced or manufactured SBT products (DNA testing) by selecting foreign vessels from a list (since the 2014 fiscal year, Japanese vessels have also been included) to see whether they are bringing in bigeye tuna, or smuggling SBT. The Fishery Agency conducts tag checks on the market twice a month, In order to verify that SBT have the correct tags with the correct information (to see whether the information on the tag matches that of the RTMP.

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3.14.3	MPR 2b: [Operating systems and processes established and implemented for verification, including] Reviewing and analysing information from CDS documents at least once every 6 months, including (i) checking the completeness of data on CDS forms and cross- checking the consistency of the data on CDS forms received with other sources of information; (ii) cross-checking data from the Executive Secretary's CDS six-monthly report; and (iii) analysing any discrepancies.	No documentati on / evidence of reports being submitted to CCSBT as specified by the MPR and associated CCSBT obligations	Reports submitted to CCSBT but outside of the timeframes required by CCSBT as specified by the MPR and associated CCSBT obligations	Reports submitted to CCSBT in accordance with the timeframes required by CCSBT as specified by the MPR and associated CCSBT obligations	Data checking process / auditing of CDS documentati on not implemente d.	Reports observed that demonstrate the data checking process / auditing is conducted by management of CDS documentation	Reports observed that demonstrate the data checking process / auditing is conducted by management of CDS documentation	Member State unable to demonstrate the reviewing and analysis of information from CDS documents.	Member State able to demonstr ate examples the reviewing and analysis of informati on from CDS documen ts, identifyin g incidence s where discrepan cies and accuracy of CDS documen ts have been identified but the CDS data is inconsiste nt and such inconsiste ncies are unresolve d.	Member State able to demonstrate examples the reviewing and analysis of information from CDS documents, identifying incidences where discrepancies and accuracy of CDS documents have been identified and resolved using their operating systems and processes. All data checks conducted within defined CCSBT timeframes.	9		3	2	3	8	Reviews are not 6 monthly although and end of season review is performed. No evidence of reduced performance was reported although implementation is not in strict accordance with MPR.
3.14.4	MPR 2c: [Operating systems and processes established and implemented for verification, including] investigating any irregularities suspected or detected and (MPR 2d) taking action to resolve any irregularities.	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules, systems and procedures in place. Documentat ion consistent with CCSBT MPR.	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	Data checking process / auditing of CDS documentati on not implemente d.	Reports observed that demonstrate the data checking process / auditing is conducted by management of CDS documentation	Reports observed that demonstrate the data checking process / auditing is conducted by management of CDS documentation	Member State unable to demonstrate examples where discrepancie s and accuracy of CDS documents have been identified using their operating systems and processes.	Member State able to demonstr ate examples where discrepan cies and accuracy of CDS documen ts have been identified using their operating systems and processes	Member State able to demonstrate examples where discrepancies and accuracy of CDS documents have been identified and resolved using their operating systems and processes.	9		3	2	3	8	Again, no evidence of irregularities available although verification review systems beyond immediate CDS form verification did not appear established to the same degree. DNA testing is in place and improving since QAR 1.

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3.14.5 S	MPR 2e: (Operating systems and processes established and implemented for werification, including] notifying the Executive Secretary and relevant Members/OSECs, of any consignments of SBT whose CDS documentation is considered doubtful, or incomplete or un- validated.	No documentati on / evidence of reports being submitted to CCSBT as specified by the MPR and associated CCSBT obligations	Incomplete reports submitted to CCSBT as required by CCSBT as specified by the MPR and associated CCSBT obligations.	Reports submitted to CCSBT as required by CCSBT as specified by the MPR and associated CCSBT obligations.					3		3	NA	NA	3	Established although no evidence of doubtful or invalidated landings or consignments of SBT
3.14.6 N 3.14.6 N 3.1	MPR 2f: [Operating systems and processes established and implemented for verification, including] notifying the Executive Secretary of any investigation into serious irregularities, in order to present these in an annual summary report to the Compliance Committee. Notifications should include reporting (i) the commencement of an investigation; (ii) progress, within 6 months of starting the investigation; and diong so will not impede that investigation; and soutcome within 3 months of completing the investigation.	No documentati on / evidence of reports being submitted to CCSBT as specified by the MPR and associated CCSBT obligations	Reports submitted to CCSBT but outside of the timeframes required by CCSBT as specified by the MPR and associated CCSBT obligations	Reports submitted to CCSBT in accordance with the timeframes required by CCSBT as specified by the MPR and associated CCSBT obligations					3		3	NA	NA	3	Procedure is established although no evidence of serious irregularities having been investigated was presented.

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3.14.7	MPR 3: Ensure that no SBT is accepted (for landing of domestic product, export, import or re-export) without validated documentation attached.	Very little of the process is defined in documented procedures	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No or very sparse implementat ion of operating systems/pro cesses that identify no SBT is accepted (for landing of domestic product, export, import or re- export) without validated documentati on attached.	Implementatio n of operating systems/proces ses that identify no SBT is accepted (for landing of domestic product, export, import or re-export) without validated documentation attached. Less than 100% coverage.	Implementatio n of operating systems/proces ses that identify no SBT is accepted (for landing of domestic product, export, import or re-export) without validated documentation attached. 100% coverage.	Member State unable to demonstrate through their operating systems and processes that SBT is only accepted (for landing of domestic product, export, import or re- export) with validated documentati on attached.	Member State able to demonstr ate through their operating systems and processes that no SBT is accepted (for landing of domestic product, export, import or re- export, import or re- export, without validated documen tation attached. However, there are examples where SBT has been accepted with inconsiste nciss in the validated documen tation.	Member State able to demonstrate through their operating systems and processes that no SBT is accepted (for landing of domestic product, export, import or re- export) without validated documentatio n attached.	9		3	3	3	9	Legally established requirement. No evidence of invalidated SBT cases were available.	
3.15	Transhipment (at sea) Monitoring Program 1 (CCSBT Obligation 3.3 (i) – (v))																	

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3.15.1	MPR1a: [Operating systems and processes to ensure] The authorisation document, including details of the intended transhipment provided by the master or owner of the LSTLV, is available on the LSTLV prior to the transhipment occurring.	No documentati on / evidence of operating systems and processes in place	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	Transhipme nt authorisatio n documents not provided to the master or owner of the LSTLV and available on the LSTLV prior to the transhipmen t occurring. (This can be assessed through observer summary reports if available)	Transhipment authorisation documents provided to the master or owner of the LSTLV and available on the LSTLV and available on the LSTLV and transhipment occurring. However, incidences recorded where documents were not provided as required by the MPR (This can be assessed through observer summary reports if available).	Transhipment authorisation documents provided to the master or owner of the LSTLV and available on the LSTLV prior to the transhipment occurring. No incidences recorded where documents were not provided as required by the MPR (This can be assessed through observer summary reports if available).			6		3	3	NA	6	A list of authorized carrier vessels is supplied by Japan to CCSBT. Carrier ships involved in transshipment must submit overseas unloading report (notification of change) and be in receipt of a permit (authorization) at least ten days before transshipment
3.15.2	MPR1b: [Operating systems and processes to ensure] Any carrier vessel receiving the transhipped SBT is meeting its obligations to provide access and accommodation to observers, and to cooperate with the observer in relation to the performance of his or her duties (see Carrier Vessel Authorisation minimum performance requirements, CCSBT documentation).	No documentati on / evidence of operating systems and processes in place	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	Observer deployment s not conducted in accordance with the MPR requirement S	Observer deployments conducted with some incidences of incidences where an observer deployment has not been in accordance with the MPR requirements.	Observer deployments conducted in accordance with the MPR requirements.			6		3	3	NA	6	carrier vessels must apply for an observer dispatch from the Fishery Agency (/proprietor) between 2 months and 15 days prior to transshipment, and consent to cooperation with the CCSBT(IOTC/ICCAT) observer programme

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3.15.3	MPR2a-d: [Rules in place to ensure] (a) all SBT transhipments receive prior authorisation; (b) fishing vessels are authorised on the CCSBT authorised fishing vessels are attex on the date(s) the SBT are harvested and carrier vessels are authorised on the CCSBT authorised carrier vessel register on the date(s) any transhipments occur; (c) a named CCSBT observer is on board the carrier vessel; and (d) no SBT transhipment occurs without an observer onboard.	No documentati on / evidence of operating systems and processes in place	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	Transhipme nts not conducted in accordance with the MPR requirement S	Transhipments predominantly conducted with some incidences where an observer deployment has not been in accordance with the MPR requirements.	Transhipments conducted in accordance with the MPR requirements.	Transhipme nts conducted contrary to the MPR requirement s and the Member States associated documentati on, operating systems and processes.	Tranship ments predomin antly conducte d with some incidence s where an observer deployme nt has not been in accordan ce with the MPR requirem ents.	All transhipment s conducted in accordance with the MPR requirements and the Member States associated documentatio n, operating systems and processes.	9		3	3	3	9	Rules established. Fishing vessels involved in transshipments must Submit an overseas landing report at least ten days prior to transshipment, and a CCSBT vessel registration number must be shown on the CMF for a pre- transshipment permit. A CMF signed by CCSBT (local) named observers after the transshipment must be presented at landing.
3.15.4	MPR2e: [Rules in place to ensure] Transhipment declarations are completed signed and transmitted by the fishing vessel and the carrier vessel, in accordance with paragraphs 11-14 of the Transhipment Resolution, in particular that the LSTLV shall transmit its CCSBT Registration Number and a completed CCSBT Transhipment Declaration to its flag State / Fishing Entity, within 15 days of the transhipment.	No documentati on / evidence of operating systems and processes in place	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	Operating systems and processes not or very sparsely implemente d as specified by the MPR and associated CCSBT obligations	Operating systems and procedures demonstrate partial implementatio n regarding the completion of transhipment declarations.	Operating systems and procedures demonstrate full implementatio n regarding the completion of transhipment declarations. Implemented across all eligible vessels.	Data / evidence does not exist to confirm the completion and submission of transhipmen t declarations.	Data/evid ence exists to confirm the completio n and submissio n of tranship ment declaratio ns. However, not all tranship ment declaratio ns are within the required timescale S.	Data/evidenc e exists to confirm the completion and submission of transhipment declarations. All transhipment declarations are within the required timescales.	9		3	3	3	9	Within 15 days following a transshipment, a complete CCSBT transshipment registration number, must be submitted to the Fishery Agency Shimizu Office

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3.15.5	MPR3a, b: [Operating systems and processes to] Issue transhipment authorisations and verify the date and location of transhipments.	No documentati on / evidence of operating systems and processes in place	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	Operating systems and processes not or very sparsely implemente d as specified by the MPR and associated CCSBT obligations	Operating systems and procedures demonstrate partial implementatio n of the issuing of transhipment authorisations and verification of data and location of transhipments.	Operating systems and procedures demonstrate full implementatio n of the issuing of transhipment authorisations and verification of data and location of transhipments.	Operating systems and processes do not exist to confirm the issuing of transhipmen t authorisatio ns and verification of data and location of transhipmen ts.	Operating systems and processes exist but demonstr ate that there are inaccuraci es / inconsiste ncies in the issue of tranship ment authorisa tions and date/time data compare d to landings data.	Operating systems and processes exist and demonstrate that the issue of transhipment authorisation s and date/time data compared to landings data is accurate and complete.	9	3	3	3	9	When the Fishery Agency receives an overseas landing report for a pelagic bonito or tuna catch from a fishing vessel; the vessel's registration number, VMS tracking and attributable catch size are confirmed. If no problems arise, The report will be signed and will be regarded as a transshipment permit. Following that, the fishing vessel (within 15 days after transshipment) and the carrier vessel (within 24 hours after transshipment) will both submit transshipments reports, and date and location of the transshipment are verified
3.15.6	MPR3c-f: [Operating systems and processes to] Request placement of observers on board carrier vessels; notify any cases of 'force majeure' (where transhipment occurs without an observer on the carrier vessel) to the Executive secretary as soon as possible; ensure observers can board the fishing vessel before transhipment takes place, and have access to personnel and areas necessary to monitor compliance; enable observers to report any concerns about inaccurate documentation or obstruction, intimidation, or influence in relation to carrying out their duties.	No documentati on / evidence of operating systems and processes in place	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	Observer deployment s not conducted in accordance with the MPR requirement S	Observer deployments conducted with some incidences of incidences where an observer deployment has not been in accordance with the MPR requirements.	Observer deployments conducted in accordance with the MPR requirements.				6	3	3	NA	6	Systems in place. To date, no transshipment has been reported to have taken place without observers on board as a result of circumstances beyond anyone's control. With regard to observers boarding the vessels, as a guide to observation of regulation in relation to offering adequate facilities, cooperation with equipment arranging and facilities for boarding, the office forwards to the carrier vessel operator the 'Resolutions Regarding Establishment Planning for Transshipment by Large Fishing Vessels'. The observers will report any interference, intervention, pressure the experienced during the experienced during the scution of their duties in their report, as well as through their bulletin to the dispatch company.

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3.15.7	MPR3g, h: [Operating systems and processes to] monitor compliance with the control measures; and impose sanctions or corrective action programmes for any non- compliance detected.	No documentati on / evidence of operating systems and processes in place	Informal non-legally binding rules, operating systems and processes in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules, operating systems and processes. Clearing defined rules in place with documentation sighted.	Monitoring compliance with the control measures; and imposing of sanctions or corrective action programmes for any non- compliance detected not implemente d as specified by the MPR and associated CCSBT obligations	Demonstrable implementatio n of monitoring compliance with the control measures. The imposing of sanctions or corrective action programmes for any non- compliance detected not demonstrable as specified by the MPR and associated CCSBT obligations	Full implementatio n of monitoring compliance with the control measures, and imposing of sanctions or corrective action programmes for any non- compliance detected as specified by the MPR and associated CCSBT obligations	No monitoring compliance with the control measures; and imposing of sanctions or corrective action programmes for any non- compliance detected as specified by the MPR and associated CCSBT obligations	Data / evidence available to show that monitorin g complian ce with the control measures but no data / incomplet e data available on imposing of sanctions or corrective action program mes for any non- complian ce detected as specified by the MPR and associate d CCSBT obligation s is conducte d.	Data / evidence available to show that monitoring compliance with the control measures; and imposing of sanctions or corrective action programmes for any non- compliance detected as specified by the MPR and associated CCSBT obligations is conducted.	9		NA	NA	NA	0	With regard to the compliance status after transshipment, VMS tracking will be checked once per day, and comprehensive checks will be made of the transshipment report and the vessel entering port for unloading. In addition, the Fishery Agency will manage receipt of the transshipment observers' reports from the observers' on board and this information is forwarded to the Agency by the local fishery organization at each Port. Any queries will be referred to the carrier vessel's company and if there is no resolution, the vessel may be struck from the authorized vessel list. To date, no incidences of non-observance have been uncovered.
3.16	sea) Monitoring Program 2 (CCSBT Obligation 3.3 (vi))																

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3.16.1	MPR1: Operating systems and processes are in place to (a) identify and resolve any discrepancies between the fishing vessels's reported catches, CDS documents and the amount of fish counted as transhipped; and (b) 100% supervision of all fish transhipped.	No documentati on	Informal non-legally binding rules in place. Documentat ion consistent with CCSBT MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	No implementat ion of operating systems/pro cesses that identify discrepancie s between catch reporting.	Only partial implementatio n of operating systems/proces ses that identify discrepancies between catch reporting demonstrated. Less than 100% supervision achieved for all fish transhipments	Implementatio n of operating systems/proces ses that identify discrepancies between catch reporting demonstrated. 100% supervision achieved for all fish transhipments	Member State unable to demonstrate examples where discrepancie s have been identified using their operating systems and processes.	Member State able to demonstr ate examples where discrepan cies have been identified using their operating systems and processes	Member State able to demonstrate examples where discrepancies have been identified and resolved using their operating systems and processes.		9		3	3	3	9	The fishing vessels RTMP report data and CDS submitted are checked. Pre-and post- transshipment reports are required from both vessels involved in a transshipment, and their information is collated.
3.16.2	MPR2: Operating systems and processes are in place to allow any CDS forms for domestically landed SBT that were transhipped at sea to be validated at the time of landing.	No documentati on / evidence of operating systems and processes in place	Informal non-legally binding operating systems/pro cesses in place. Documentat ion consistent with the requirement s of the MPR	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	Validation of domestically landed SBT from at-sea transhipmen ts not implemente d as specified by the MPR and associated CCSBT obligations	Validation conducted for domestically landed SBT from at-sea transhipments as specified by the MPR and associated CCSBT obligations, but systems/proce dures do not demonstrate 100% coverage of landings.	Full validation of all domestically landed SBT from at-sea transhipments as specified by the MPR and associated CCSBT obligations	Validation of domestically landed SBT from at-sea transhipmen ts not implemente d as specified by the MPR and associated CCSBT obligations	Demonstr ated that data is collected from domestic ally landed SBT from at-sea tranship ments as. Linked to Member States catch reporting but mass balance of data doesn't demonstr ate the data is accurate.	Demonstrate d that data is collected from domestically landed SBT from at-sea transhipment s as. Linked to Member States catch reporting and mass balance of data demonstrates the data is accurate.		9		3	3	3	9	Transshipment reports are checked, and their consistency with the landed inspection report is validated.
3.17	Transhipment (at sea) Monitoring Program 3 (CCSBT Obligation 3.3 (vii))																	

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3.17.1	MPR1: Rules, systems and procedure to ensure all transhipped product is accompanied by signed Transhipment Declaration until the first point of sale.	No documentati on / evidence of rules, systems and procedures being conducted as specified by the MPR	Informal non-legally binding rules, systems and procedures in place. Documentat ion consistent with CCSBT MPR.	Documentation consistent with CCSBT MPR in the form of legally binding rules. Clearing defined rules in place with documentation sighted.	Transhipme nt (at sea) Monitoring Program not implemente d as specified by the MPR and associated CCSBT obligations	Rules, systems and procedures observed that demonstrate that transhipment declarations data checking process / auditing is conducted by management that incorporate a part of the SBT fishery	Transhipment (at sea) Monitoring Program is fully implemented but not fully consistent with the requirements of the Transhipment (at sea) Monitoring Program as specified by CCSBT Obligations. Reports observed that demonstrate the data checking process / auditing is conducted by management that incorporate the whole SBT fishery	Transhipme nt (at sea) Monitoring Program not providing data to CCSBT as specified by the MPR and associated CCSBT obligations. Data checking / auditing process does not exist to ensure accuracy if the "Attributabl e SBT Catch"	Tranship ment (at sea) Monitorin g Program providing incomplet e data to CCSBT as specified by the MPR and associate d CCSBT obligation S. Data checking / auditing process exist but demonstr ate that there are inaccuraci es in the "Attributa ble SBT Catch"	Transhipment (at sea) Monitoring Program providing complete data to CCSBT as specified by the MPR and associated CCSBT obligations. Data checking / auditing process demonstrates that the "Attributable SBT Catch" is accurate.	9		3	3	3	9	Rules established and implemented. No evidence of discrepancies/ or absence of transhippment Declaration with transhipped product.
3.18	Annual Reporting to the Compliance Committee (CCSBT Obligation 6.5)																
3.18.1	MPR1: Submit information and report electronically to Executive Secretary at least 4 weeks before the annual Compliance Committee meeting.	No documentati on / evidence of reports being submitted to CCSBT as specified by the MPR and associated CCSBT obligations	Reports submitted to CCSBT but outside of the timeframes required by CCSBT as specified by the MPR and associated CCSBT obligations	Reports submitted to CCSBT in accordance with the timeframes required by CCSBT as specified by the MPR and associated CCSBT obligations							3		3	NA	NA	3	Japan issues annual reports before the day of the meeting. Templates for the 16th annual national report sections II (1) (d) : VMS, II (3)(a) +ii, III(2)(a)-(c), I(3), III(3) have all been completed.

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3.18.2	MPR 2: The report for the previous calendar year must (a) include the quantities of SBT transhipped; (b) list the LSTLVs on the CCSBT Authorised Vessel List that transhipped; (c) analyse the observers reports received including assessing the content and conclusions of the reports of observers assigned to carrier vessels.	No documentati on / evidence of reports being submitted to CCSBT as specified by the MPR and associated CCSBT obligations	Reports submitted to CCSBT but outside of the timeframes required by CCSBT as specified by the MPR and associated CCSBT obligations	Reports submitted to CCSBT in accordance with the timeframes required by CCSBT as specified by the MPR and associated CCSBT obligations					3		з	NA	NA	3	
								SCORE			180	136	123		
								TOTAL AVAILABLE	456		180	141	126	439	
										· · · ·		EXPRESSED AS A PERCENTAG E OF TOTAL		96.3%	