



Trial Quality Assurance Review

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



Summary Report on the 2016 QAR Programme

Undertaken by Global Trust Certification Ltd.

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Executive Summary

- The 2016 Quality Assurance Reviews were commissioned by the Commission for the Conservation of Southern Bluefin Tuna (CCSBT), with the objective of progressing further on-site audit application (Phase 2) to complement the existing desk review procedures undertaken in 2013 for measuring compliance against the Minimum Performance Requirements (MPR's) set out by CCSBT.
- This Report provides a summary and discussion of the feasibility of Phase 2 and also comments on the outcomes of QAR's for New Zealand (Phase 2), and Korea (Phase 2). Individual QAR Reports for each Member provide the full details of the performance of each Member's management system against the CCSBT MPRs.
- 2016 QARs were conducted according to the procedure developed in 2014 QARs Phase 2 and also Phase 1 procedure developed for desk top audits in 2013.
- While individual Member reports provide more specific information on the outcomes of the QAR, this report deals with the overall outcome of the feasibility, including benefits of using this type of third party assessment, limitations of the procedure and recommendations for future QAR development activity.
- The Trial QAR methodology was developed using standard third-party audit processes to ensure reliability and consistency, consistent with applications commonly found in commercial/industry applications of ISO based certification systems. A description of the procedure is provided in the Appendix.
- QAR Phase 1 for Korea was practically fully up-dated across all MPR's. This was undertaken since the review team considered the developments in the Korean SBT management system significant and easier to report in this way rather than via the Phase 2 Gap analysis alone.
- Both New Zealand and Korea QAR's, site visits allowed a wider consultation with government departments and agencies that form the management systems and also industry bodies. This proved helpful in terms of verification of the operations supporting the implementation of management procedures designed to deliver MPR's.

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- The Korean QAR was conducted through the Korean language although the reviewers were very grateful to the Korean delegation in accommodating conversations in English throughout the site visit and on numerous conference calls and e-mail exchanges prior and post the site visit.
 - Site visit schedules, agendas and execution can place constraints on management resources. Delays were experienced in undertaking the Korean site visit due to managerial changes at MOF and workloads. The site visit was very well supported by Korean officials and all visits scheduled took place May 9th to 13th but which did place some pressure on completing a draft for the May 31st deadline. Additionally, staff movements at MOF and then at Global Trust also contributed so small delays but neither affected the review from continuing to completion.
 - No delays were encountered with respect to the New Zealand QAR.

Acknowledgement

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

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ABBREVIATIONS

CCSBT	Commission for the Conservation of Southern Bluefin Tuna
MPR	Minimum Performance Requirement
QAR	Quality Assurance Review
SBT	Southern Bluefin Tuna

1 Introduction

Between February and August 2016, Global Trust Certification Ltd conducted Quality Assurance Reviews (QAR) of two Member States of the Commission for the Conservation of Southern Bluefin Tuna (CCSBT). These were for New Zealand and the People's Republic of Korea (Korea).

The QAR's were conducted in accordance with the Phase 2 procedure developed in 2014 for on-site audits of Member State management systems for Southern Bluefin Tuna (SBT) and also consistent with Phase 1 procedure (2013). The aim of the QAR audits is to demonstrate the extent to which processes are in place to ensure Members meet the obligations set out in CCSBT's Compliance Policy Guideline 1, "Minimum performance requirements to meet CCSBT obligations".

This report provides a short summary of the main outcome of the QAR Phase 2 activities for each Member and identifies if and reasons for any changes from procedure during the reviews. The report provides recommendations on if and how these may be avoided and also on improving the QAR process in general both for Phase 1 and 2. Finally, a revised Phase 1 and 2 procedure is provided in the Appendix 1 and a flow diagram of the main steps. Red font is used to highlight proposed new amendments to procedure.

2 Phase 2 QAR Member Outcomes

2.1 New Zealand

In the case of the New Zealand (NZ) report Phase 1 and 2 were conducted independently and combined for submission to CCSBT.

New Zealand monitors the SBT fishery in accordance with CCSBT's Minimum performance requirements (MPR) and has a compliant fisheries regulatory management system in place. New Zealand's SBT fishery is managed under New Zealand's quota management system (QMS) in line with its primary fisheries legislation (*the Fisheries Act 1996*). The Ministry for Primary Industries (MPI) is the government authority responsible for the management of the SBT fishery. New Zealand's SBT fishery is caught predominantly by domestic vessels, with all catches made within New Zealand's Exclusive Economic Zone (EEZ). New Zealand's SBT fishery is primarily a fresh export fishery to Japan.

New Zealand's national catch is allocated on an annual calendar year basis, with the fishery from 1st October – 30th September each year. New Zealand's SBT Allowable Catch (AC) is set as a national Total Allowable Catch (TAC) under the QMS. The national TAC for SBT is the total quantity of SBT that can be taken by all fishing sectors (commercial, recreational, customary Maori and other sources of fishing-related mortality). Once allocations of the recreational, customary and sources of other fishing mortality have been made the commercial TACC (total allowable commercial catch) is defined. Quota ownership of the TACC does not entitle the owner to catch fish but it entitles them to receive an Annual Catch Entitlement (ACE) which is commensurate with their quota shares. ACE represents the amount of a particular species that can legally be caught in a particular fishing year and is determined before the start of the fishing year (1st October – 30th September). Quota shares are a transferable property right representing the quota owner's share of the fishery. FishServe is contracted by MPI to undertake the administration required to allocate quota for stocks covered by the QMS.

New Zealand vessels in the SBT fishery are required to submit set by set tuna longlining catch and effort returns (or other method returns when SBT is caught as bycatch), whilst monthly catch reporting is also in place for permit holders (monthly harvest returns and landing return) and licensed fish receivers (LFRs) (licensed fish receiver returns). All reporting is submitted by the 15th of the following month. New Zealand does not have any large scale tuna longlining vessels (LSTLVs) and does not conduct transshipments. Fisheries monitoring is conducted through at-sea observer coverage and in port inspections by fishery officials. There were no at-sea inspections reported in the 2015 season; however there is the capability to conduct at-sea inspections in future seasons. Aerial patrols also occur. While these have not specifically targeted the SBT fishery to date, they may encompass vessels fishing for tuna species.

New Zealand's SBT fisheries management systems have been shown to be effective in terms of the CCSBT MPRs with well-established fisheries legislation, a strong fisheries management regulatory system and established fisheries reporting and sanctions. The QAR has identified some weaknesses associated with the New Zealand management system and provided recommendations where appropriate. Given the level of at-sea observer coverage and at-sea inspections of domestic and recreational vessels potential risks have been identified associated with high grading/discards from vessels, although it should be noted that provision is made for this within the TAC, so any such high-grading is unlikely to result in NZ exceeding its country allocation under present conditions. A phenomenon of duplicate tags had been noted (prior to the review) and the review team make recommendations in the report in connection with this.

Key Recommendations identified in the Phase 2 QAR for New Zealand were:

- Include improving knowledge of recreational and customary catch
- Increasing the amount of SBT fishing activity monitored (e.g. through at-sea inspection and more frequent port-side monitoring of unloads)
- Increasing the ability to identify duplicate tag numbers in a timely manner through implementing an integrated electronic reporting system.

2.2 Korea

Korea is a distant water fishing country, reported as catching the fourth most in terms of tuna catches globally¹. Korea is also a growing market for SBT. The legal basis for the management of Korean distant waters fisheries is the *Distant Water Fisheries Development Act* (DWFDA, 2015 Revision). This Act legally requires fishing vessels and the Korean government to comply with Regional Fisheries Management Organisations (RFMOs) such as the CCSBT, Indian Ocean Tuna Commission (IOTC) and International Commission for the Conservation of Atlantic Tunas (ICCAT) of which Korea is a member. The Korean SBT fishing fleet consists of a small number of large-scale long liners operating exclusively in international waters. The operational management of the fishery is the responsibility of the Ministry of Oceans and Fisheries (MOF), which devises and implements all technical measures and documentation requirements applied to the SBT fishery. The key management instrument is the annual application of a Total Allowable Catch (TAC), which is set in line with the CCSBT Allocated Catch (AC) for Korea. This TAC is initially allocated by the MOF to the three companies, which currently apportion the share of the fishery based on their historical effort share, and subsequently to individual vessels within those companies. The *Distant Water Fisheries Development Act* stipulates a number of additional management requirements, such as mandatory VMS, logbook keeping and catch reporting.

¹ Fao website 2016 <http://www.fao.org/docrep/007/y5428e/y5428e03.htm>

The majority of Korean SBT catch is landed into Japan, either directly by the fishing vessel or via authorised foreign-flag carrier vessels.

The management systems and processes applied by Korean to the SBT fishery have been successful in ensuring that the reported Attributable SBT Catch (ASBTC) has not been exceeded Korea's CCSBT AC, apart from one, historical instance in 2010 when the ACT was exceeded by 8 tonnes. Catches are reported to the Fisheries Monitoring Centre (FMC) and the National Institute of Fisheries Science (NIFSS) via electronic logbook system on a daily basis. Vessels also return the completed logbooks at the end of a trip. Logbook data is used as part of the validation of CDS documentation to ensure consistency and reduce the probability of misreporting. Accuracy of SBT catch and mortality estimates is also supported by observer scheme data, VMS monitoring, portside inspections at landing and the mandatory presence of an independent observer, associated with the relevant RFMO observer programme, whenever fish are transshipped at sea. At Port transshipments are not part of the observation scheme but monitoring and inspection does occur at Shimizu, Japan and Busan. There has been occasional transshipment in other Ports in previous seasons (e.g. Cape Town and Port Louis,) and these are under the inspection regimes of those State Authorities.

Korea's SBT fisheries management systems are effective in terms of the CCSBT minimum performance requirements. Features of the system include; recently enacted fisheries legislation, an active fisheries management regulatory system and established fisheries reporting and sanctions. However, the QAR Phase 2 did identify some potential weaknesses associated with aspects of the Korean system and has provided recommendations where appropriate. To the most, Korea has already recognized these potential weaknesses and had already made improvement plans to mitigate against these prior to the Phase 2 QAR Review. The review team make an overall recommendation that a full inter-agency wide review of the SBT CDS management system be undertaken and this may help confirm the various roles of each agency of MOF and MFDS and also help identify if risks still remain with respect to validation activities, for example for CMF's and REEF's.

Key Recommendations for Korea

- [In the absence of] increasing the amount of SBT fishing activity monitored (e.g. through at-sea inspection and observer coverage) adopt alternative remote monitoring systems (camera systems for example which are under test).
- Introducing joint training for Food Agency Staff and MOF to reduce the potential risk of misidentification of SBT imports.
- Undertake an overall inter-agency wide review of the relatively new processes/systems effectiveness (including foreign port transshipments information, SBT importer documentation and MFDS records to support validation of CDS documents).

3 Phase 2 QAR Process

3.1 QAR Reporting Template

The template used for reporting of QAR reviews included October CCSBT MPR's -2015 revision).

3.2 Procedural deviations

New Zealand

There were no deviations from the Phase 2 procedure for the New Zealand review. The initial information review took place between February and March with the site visit, taking place on dates between an extended time of 21st March– 2nd May. This was made possible as both reviewers were based in New Zealand and could readily organise meetings to accommodate schedules. A draft was delivered to New Zealand MPI on May 31st and returned on July 31st in accordance with procedure. The final draft was sent August 31st 2016.

Korea

With respect to the Phase 2 review for Korea, there were some deviations relating to time delays and draft report stages.

The site visit for the Korea Phase 2 review took place between May 9-13, later than originally envisaged in order to accommodate The Ministry of Fisheries (MOF) staffing arrangements for the 2015/16 SBT fishery. The site visit was very well supported and hosted by MOF and also ancillary agencies and by the industry association, KOFA who attended meetings and hosted tours.

However, with the delayed site visit and translation time the report sent on May 31st although in accordance with procedure (date wise), the draft remained a 'working draft' to which Korea provided further and substantial information taking place over 2 conference calls and numerous e-mail exchanges of additional information and clarification of documents.

Staff changes then occurred both at Global Trust and the MOF.

At Global Trust, the departure of the lead reviewer, Giles Bartlett, lead reviewer was replaced by Dave Garforth and supported by a member of the New Zealand team, Oliver Wilson both who had been involved in Phase 1 QAR for Korea and who had direct experience of other QAR reviews, Australia/New Zealand.

At the MOF, the key liaison Ms. Zee Kim (Policy Analyst Fisheries in international waters/RFMOs Korea Overseas Fisheries Cooperation Agency under the MOF) departed in

mid-July. Mr. Kim Sung Ho, Deputy Director, Distant Water Fisheries Division, MOF undertook direct contact duties with Global Trust and who provided responsive and detailed assistance with further information and comments on the completed draft returned July 29. From this, the final report was produced (with some further clarification requests) and sent to Korea on September 1st. A final report was then sent on September 8th. A response to the report was sent via e-mail with two points of clarification which was added to the Member Section 8 for tracking purposes and a small correction on Phase 2 site visit outcomes table.

3.3 Significant changes to Member Management Systems

Phase 1 reviews were completed in 2013 for both New Zealand and Korea. In both cases, there were changes /up-dates to the management systems since that time which for New Zealand were more process improvements and readily reportable in the Phase 2 section and Gap analysis section of the report.

However, in the case of Korea, the changes were more significant and related to the organisational changes. Some of these had been reported in the 2013 Phase 1 QAR, relating to the formation of the Ministry of Fisheries but since that time, there has been further structural changes, with the formation of NFQS, the FMC and development of the Fishery Information Management System and database. These were all deemed positive and supportive steps with respect to MPR compliance. Due to the significance of these changes, a decision was taken to up-date Phase 1 QAR section of the report rather than attempt to add all of the changes in the GAP section.

4 Strengths and Weaknesses of the QAR Phase 2

Previous summary reports have reported on strengths, weaknesses and made recommendations on improvements in the QAR procedure and reporting formats. Some of these are repeated here and used to re-emphasize points already made and some additional items are raised.

Strengths of the QAR Phase 2

The strengths of Phase 2 QAR remain as described:

- (As previously stated); 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.
- (As previously stated); 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.
- (As previously stated); 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 readily 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 over time or Members which are actively improving key areas of their systems and wish to have specific MPR's assessed.
- (As previously stated); the addition of on- site audits as described by Phase 2 to complement Phase 1 QAR's can provide a far higher level of confidence to Members, CCSBT and their stakeholders.
- 2016 QAR's were conducted in the local language but reported in only English language. This was a recommendation made in 2015 reviews due to the challenges encountered during the review team's ability to access reports drafted in the local language during the drafting process. There is also a cost associated with translations. This amendment is reported as strength and helped to avoid the report access problems encountered in previous reviews when written in local language.

Weaknesses (and Limitations/Risks Encountered)

There were no major weaknesses specific to the QAR process per se, although as described, there were some delays in commencing the Korean site visit and staff changes that added to the small delay in completion. Global Trust did not see these presenting a risk to the report output per se, although it does re-inforce some previous items raised.

- As previously stated, sufficient briefing to Members from the outset is essential in developing understanding on how 'on-site audits' are undertaken and the time constraints associated with the review. It is important that Members fully grasp the need to respond to questions with ample documentary evidence. (Refer to recommendations regarding Application/Briefing Document). This recommendation is made generally and is not specific to any individual Member QAR since there are always challenges encountered in all audits.
- As previously stated, a scoring mechanism would help in streamlining report outcomes and facilitate comparisons and benchmarking improvements over time.

Observations

- An observation rather than a weakness, the changes in the Korean SBT management system since Phase 1 (2013) resulted in a more complete up-date of that section of the report than otherwise undertaken in other Phase 2 QAR's.

5 Recommendations for Future QAR Development

The following QAR procedural recommendations are made reflecting upon both the existing and previous QAR Member reviews. Again, some of the recommendations have been made before but are re-presented for completeness.

5.1 An Application Process

It may be worth considering a formal application process for QAR reviews. An Application Form is used in most ISO based audit systems and provides a mechanism to communicate and seek agreement of the terms and requirements of an audit/certification scheme. Normally, it includes;

- A short description of the audit process and timelines
- Any legal and contractual matters arising,
- Arrangements for confidentiality of information and reporting matters,
- A process to formally convey the expectations of responsibilities on the applicant such as openness, facilitating site visits, access to information etc.,

An application helps the applicant to understand what the audit is about, what to expect and what is expected of them. Some of the categories noted above are not required (for example, contractual arrangements as this is with CCSBT) and most of the information is already available in Terms of Reference and Procedures. The Application creates a point of sign off of the agreement of terms on behalf of each party.

An alternative to an application process, which could also convey the main points of communication on the QAR could be the creation of a QAR Guide for Members that they would receive at the beginning of the process and could refer to in order to prepare for the key steps in the audit.

5.2 Audit Checklist Tools – further development

In common with all third party ISO processes; consistency of the audit method, calibration of auditors (for consistency) and ensuring reporting consistency are major aspects that are necessary to deliver the overall credibility of the scheme. Hence, to achieve these objectives, scheme owners develop well defined procedures, auditor competency criteria, training requirements and reporting templates. In some cases, auditor guidance or other auditor tools such as audit checklists are developed to aid the consistency of methods, assist with on-site audit consultations and information collection. An audit plan and specific areas of interest is currently developed. However, Global Trust proposes to develop a more detailed on-site audit checklist that condenses the MPR's for on-site use would assist with

the collection of information, particularly when auditors are also managing translations at the audit meetings. Audit tools or checklists aid information collection, help steer the audit schedule and allow auditors to 'tick-off' major items covered during the audit and items that may have been prioritised before the visit such as issued identified in the Phase 1 reports and from other available CCSBT documentation/information exchanges.

5.3 QAR Phase 1 and 2 Template and Scoring

As noted previously, once the current round of all Phase 1 and 2 audits are completed it would be an appropriate to return to the structure of the QAR template report and consider how it could be improved, both for ease of access of information, avoid some of the repetition where possible and also if a scoring system can be brought into the process. Global Trust is aware that for the time being, the current reporting structures will apply to ensure equal reporting formats for all Members that take part in the QAR process.

Appendix 1: CCSBT Quality Assurance Review Procedure v2.1 (Sept 2016)

The QAR Phase 1 and 2 procedures are presented below with proposed additional procedural additions presented in red text subject to CCSBT approval.

Procedure for CCSBT MPR Member Quality Assurance Reviews (QAR)

Current Revision: Version 2.1 (Sept. 2016)

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.

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

Flow diagrams summarising the final QAR methodology are provided in Figure 1 and 2.

2. Purpose and Scope

This methodology description sets out the detailed procedure that an independent review body shall follow in order to undertake an assessment of 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. These Obligations are revised from time to time and reviewers should ensure that the latest edition is used to form the basis of the assessment.

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 Procedure Version 2.1

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 third party assessment.
- 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*** (Revised at the Twenty-Second Annual Meeting: 15 October 2015).

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 Member Review Template, Version 2.1, August 2016 (hereafter referred to as the QAR template) (including Phase 1 and 2 of the review process).

X. Member and CNM Application Process (proposed)

The Assessment Body shall be directed by CCSBT on the specific Members and CNMs that will be subject to QAR. The Assessment Body shall forward an Application Form, either

directly or via CCSBT to the invited Member of CNM subject to the QAR. The Application Process shall provide sufficient information on the QAR process, broad stages (QAR Phase 1 and/or Phase 2), confidentiality arrangements, access to information and audit evidence and identification of the key person(s) that will facilitate the information, coordination of conference calls and site visit meetings on behalf of Member/CNM. The Application should be signed and returned to the Assessment Body.

5. QAR Planning and Appointment of Reviewers

Identification of Members and CNMs

The Assessment Body shall liaise with CCSBT to determine any additional requirements, such as the language(s) of consultation meetings, priority areas to be included in the review, written communications and any requirements for final QAR reporting.

Appointment of Review Team by the Review Organization

The Assessment Body 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 Procedure.

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 and the language, sufficient to support meaningful assessment of the Member/CNM.
- 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 part 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 Assessment Body to ensure the designated Review Team members achieve the minimum acceptable criteria as laid out in section 5 of this document.

The appointment of the Review Team shall be communicated 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

Where any component of the review (e.g. consultation meetings, final report) is to be conducted in a language other than English, one reviewer shall be sufficiently fluent in that language to facilitate translation during conference calls, on site audit and documentation translation.

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

Reviewers will be briefed on their specific role in the review plan and undergo training in this Procedure including;

- 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 in accordance with good auditing practices.

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 Assessment Body.

The Review Team will receive copies of the following documents:

- Minimum Performance Requirements to meet CCSBT Obligations – Compliance Policy Guideline 1 (current edition)
- QAR template (the current Version)
- Examples of previous QAR reports, including any conducted on the Member or CNM under review (Phase 1 Reports).
- 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. Phase 1 Review Plan

The Review Plan shall be prepared by the Project Lead Reviewer alongside discussion with the appointed Review Team and include details of any additional priority areas identified in CCSBT documents.

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.

The QAR Team shall ensure the review prioritises the overall nature of the Members/CNM's management system for Southern Bluefin Tuna as defined 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;
- iii) **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 transshipment and monitoring of direct exports of SBT.

7. Overview of Review Process (Phase 1)

The main body of the review process follows this series of steps (also refer to Figure 1):

- 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 on-going communication with fishery management bodies (via the Member/CNM facilitator where possible)
- Final QAR report, including SWOT analysis
- Submission to Member for 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 or Country 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:

- Confirm 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 Member/CNM should where possible, agree an individual to use as a 'point of contact' throughout the review process (Member Facilitator).

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 of the Member/CNM

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 support 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 Member/CNM

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 allow for consultation with non-governmental SBT fishery stakeholders but only where the Member/CNM has been informed prior to the consultation taking place and they are in agreement. 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.

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.
- (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. Internal Review of Member QAR Phase 1

The Assessment Body shall arrange for each QAR Report to be reviewed internally to ensure quality and consistency of reporting outcomes and highlight any aspects that may be inconsistent or require further clarification. The Lead Reviewer shall incorporate any necessary changes to the Report and where necessary seek any further clarification with the Member/NCM.

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
- An annex providing a list and if deemed necessary examples of any supporting paperwork, including catch reporting forms, observer data collection forms, licencing and auditing forms, and so on.

Phase 2 Quality Assurance Review (QAR) Procedure

1. Scope

This procedure sets out the additional requirements 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 at a point 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.

2. Review Team

Review team members shall be appointed under the same conditions as Phase 1.

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 Checklist

The Review Plan shall be prepared by the Lead Reviewer alongside discussion with the appointed Review Team and Project Lead 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 their 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.
- An agenda for each meeting shall be provided. An outline schedule for each meeting and agenda shall be provided to each of the entities at least one week in advance of each meeting/consultation

5. Audit Checklist (proposed)

An Audit Checklist shall be developed for the site visit. This shall be based on a standard template and used to collect various pre-site visit areas of interest, identified priority and used to support the collection of information, notes and observations made during the site visit. The Checklist can be pre-organised to facilitate the audit path and guide the Review Team through the various points of audit interest as the site visit progresses. The Audit Checklist can also include an attendance list of personnel present at each meeting.

6. Site Visit Review Team

The site visit shall be conducted by two members of the review team; including the Lead Reviewer. As stated, one member of the team 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 than 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 English language.

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. Report Draft Member Review

The Assessment Body shall provide the Member/NCM a draft of the QAR Report on the identified date agreed with CCSBT. The Member/NCM shall be provided with 60 days to review and respond with comments, proposed additions, amendments and corrections to the Report. Members/NCM can undertake these activities directly in a track change version of via a separate document or means (e.g. via e-mail). Where mutually agreed, further consultation, e-mail exchange and conference calls with the Member/NCM can continue

through the Member Review where this is felt beneficial to ensuring accuracy of the Final Report.

11. Internal Review of Member QAR

The Assessment Body shall arrange for each QAR Report to be reviewed internally to ensure quality and consistency of reporting outcomes and highlight any aspects that may be inconsistent or require further clarification. The Lead Reviewer shall incorporate any necessary changes to the Report and where necessary seek any further clarification with the Member/NCM.

12. QAR Final Report 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 Project Lead. All sections of the report should be fully referenced whenever appropriate. As previously Final QAR Reports shall be submitted within the timeframe identified in the Terms of Reference of the CCSBT or as otherwise agreed. An electronic copy shall be provided to the identified Facilitator of the Member/CNM and to the Secretariat of the CCSBT.

Figure 1 - QAR Phase 1 methodology flow chart

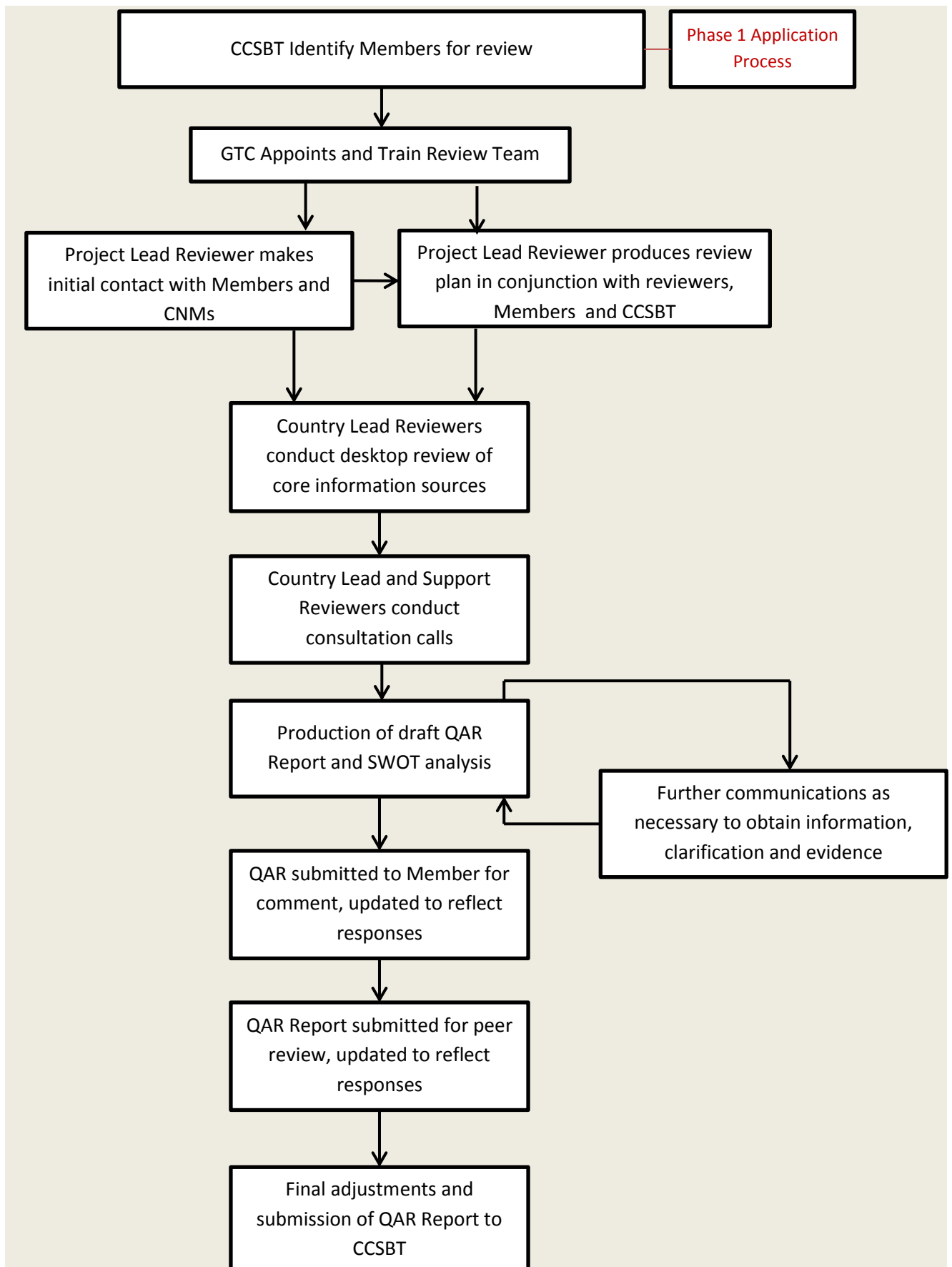


Figure 2 - QAR Phase 2 methodology flow chart

