

CCSBT/0607/05

4. Relationship with CCAMLR

CCAMLR との関係

Purpose 目的

To advise the CCSBT on developments in relation to fishing for SBT in the CCAMLR Convention Area.

CCAMLR 条約水域におけるみなみまぐろ漁業に関する情勢について CCSBT に助言する

Background 背景

At its 2005 annual meeting, the Extended Commission agreed that it should have an arrangement with CCAMLR concerning the management of fishing for southern bluefin tuna in the CCAMLR Convention Area. The Executive Secretary wrote to CCAMLR in October 2005 seeking development of such an arrangement and the proposal was considered by CCAMLR at its annual meeting in November 2005. 2005 年年次会合において、拡大委員会は CCAMLR 条約水域におけるみなみまぐる漁業の管理 に関し CCAMLR との間で取り極めを図ることに合意した。事務局長は、かかる取り極めの進展を求め 2005 年 10 月 CCAMLR に対し書簡を送付したところ、2005 年 11 月 CCAMLR 年次会合において検討された。

The terms of an agreement required by CCAMLR were conveyed to the Executive Secretary after the CCAMLR annual meeting and the Executive Secretary has replied indicating the issues raised by CCAMLR need to be discussed by the Extended Commission. A copy of this exchange of correspondence is attached. CCAMLR の要求する取り極めの条件は、CCAMLR 年次会合後事務局長のもとに届けられ、事務局長は、CCAMLR によって提起された問題点は拡大委員会による検討を要する旨、回答した。この書簡交換の写しを別掲した。

The CCAMLR requirements for fishing for southern bluefin tuna in the CCAMLR Convention Area are broadly summarised below:

CCAMLR 条約水域におけるみなみまぐろ漁業に対する CCAMLR の要求事項を以下に概略する:

1. full details of the vessels authorised to fish for southern bluefin tuna to be provided to CCAMLR

- 1. みなみまぐろを漁獲する許可を受けた船舶の完全な詳細を CCAMLR に提供すること
- 2. the CCSBT will not authorise any vessel on the CCAMLR IUU vessel list
- 2. CCAMLR IUU 漁船リスト掲載漁船に許可を与えないこと
- 3. the provision of automatic satellite-linked VMS reports
- 3. 衛星中継自動船舶監視システムの規定
- 4. application of CCAMLR's measures on plastic packaging bands
- 4. プラスチック製梱包用バンドに関する CCAMLR 措置の適用
- 5. application of CCAMLR's provisions for the minimisation of incidental seabird mortality consistent with the nature of fishing for southern bluefin tuna
- 5. みなみまぐろ漁業の特質と両立する海鳥の偶発的死亡率の最小化に関する CCAMLR 規定の適用
- 6. submission of data on catch, by-catch and incidental mortality of seabirds consistent with CCAMLR arrangements
- 6. CCAMLR の取り極めと合致する漁獲、混獲および海鳥の偶発的死亡率に関するデータの提出
- 7. compliance with CCAMLR's system of inspection, which includes at sea inspections
- 7. 洋上検査を含む CCAMLR 検査体制の遵守
- 8. observer coverage
- 8.オブザーバー乗船率
- 9. actions related to IUU fishing
- 9.IUU漁業に関する行動

Of this list, items 3,4,6,7 and 8 are management issues where new or significant change to CCSBT management and conservation measures would be required. 本リストのうち、3、4、6、7 および 8 は、CCSBT の管理保存措置にとって新規あるいは重要な変更を要する管理上の問題である。

Context

状況

A number of options are presented in this paper for the Extended Commission to consider. Consideration of these options would be undertaken in the following context:

本文書に拡大委員会が検討すべきいくつかの選択肢を提案した。これら選択肢の考慮は以下の状況で着手されるであろう:

- Article 12 of the Convention requires cooperation with other intergovernmental organisations and this has occurred with ICCAT, IOTC and the WCPFC, where there is overlap or shared interests.
- ・ 条約第 12 条は他の政府間機関との協力を謳っており、これは重複や共通の関心事のある、 ICCAT、IOTC および WCPFC との間で行われている。
- Four of the CCSBT members, Australia, Japan, New Zealand and Korea are members of CCAMLR and have agreed to the conservation and management measures of that body.
- ・ CCSBT 加盟 4 カ国、オーストラリア、日本、ニュージーランドおよび韓国は CCAMLR の加盟国であり、その保存管理措置に合意している。

- To some degree CCAMLR's measures reflect a purpose more associated with the protection of a unique environment than the CCSBT, where the purpose of its creation related more to the commercial international exploitation of a high seas fishery.
- ・ ある程度 CCAMLR の措置は CCSBT に比べて独特な環境の保護により関連づけられた 目的を反映している、その設立の目的は公海漁業の商業国際的な開発が多分に関係して いた。
- The common interest with CCAMLR is not significant:
- ・ CCAMLR との共通点はあまり多くない:
 - Only 10 vessels are listed with CCAMLR from CCSBT members –
 Australia (2), Japan (2), New Zealand (4) and Korea (2).
 - CCSBT 加盟国から CCAMLR に掲載されているのは 10 隻のみ-オーストラリア(2)、日本(2)、ニュージーランド(4)および韓国(2)。
 - Very little fishing for southern bluefin tuna has occurred in the CCAMLR Convention Area, although in the last two years the catch has increased. Fishing in this area largely ceased in 1984 and that until 2004, the total catch in most subsequent years was less than1 tonne. There were larger catches of about 25 tonnes in 2004 and 75 tonnes in 2005. The catch in 2005 was reported by Japan and the Philippines. The catch in recent years has occurred mainly in the area 60-65° east, 45-50° south.
 - 直近2カ年で漁獲が増えたとはいえ、CCAMLR条約水域内においては極僅かなみなみまぐろの漁獲があるのみである。当該水域における漁業のほとんどが途絶えたのは1984年であり、以降2004年に至るまでほとんどの年の総漁獲量は1トン未満であった。2004年に25トン、2005年に75トンと多量の漁獲があった。2005年の漁獲は日本とフィリピンからの報告である。近年の漁獲は主に東経60-65度、南緯45-50度の水域において行われている。

Options 選択

Three options are presented for consideration by the Extended Commission. They are not recommendations but represent a set of responses to give a view of the range of possible responses available to the Extended Commission: 拡大委員会により検討されるための3つの選択肢を提示。それらは推薦ではないが、拡大委員

- i. Agree to the CCAMLR request with application of an agreement with CCAMLR specified for an area where fishing for SBT was possible (say $30-80^\circ$ east, $45-50^\circ$ south .
- . みなみまぐろ漁業が可能な水域(東経 30-80 度、南緯 45-50 度)に限定して CCAMLR と の取り極めを適用することを条件に CCAMLR の要求に合意。
- ii. Decline the request and members cease fishing in the CCAMLR Convention Area
 - . 要求を辞退し加盟国は CCAMLR 条約水域での漁業を中止する

- iii. Propose a compromise arrangement, which would reflect current CCSBT management and conservation arrangements.
 - 現行の CCSBT 管理保存措置を反映した妥協案を申し入れる。

Option (i)

選択()

Even though the amount of fishing effort and number of vessels involved is relatively small, this option would be onerous for the CCSBT unless the CCSBT wished to implement the management and conservation measures in its own right. It would probably require for the area and vessels involved:

関連する漁獲努力量と漁船隻数が比較的少ないとはいえ、このオプションは CCSBT がその権限において管理保存措置の履行を望まない限り、CCSBT にとって負担になる。それはおそらく関連する水域と漁船に要求されよう:

- the introduction of a VMS system managed by the Secretariat
- ・ 事務局管理の VMS システムの導入
- specific CCSBT action on plastic packaging bands for application across the fishing fleet
- ・ 漁船へのプラスチック製梱包用バンドに関する具体的な CCSBT の行動
- an extension of the current tori line decision and other mitigation actions to reflect the specifics of the CCAMLR resolution
- ・ 現行のトリライン決定事項の拡張と CCAMLR 決議の詳細を反映したその他の緩和措置
- increased data provision to the CCSBT database to include by-catch and incidental seabird mortalities
- ・ CCSBT ベータベースへの混獲と海鳥の偶発的死亡率を含むデータ提供の増加
- · agreement to at sea inspection arrangements
- 洋上検査取り極めの合意
- 100% observer coverage
- ・ 100%オブザーバー乗船

Option (ii)

選択(ii)

This option might be considered if the demands of Option (i) were judged by the Extended Commission to be too difficult in the context of the limited fishing activity involved.

このオプションは、選択(ii)の要求が拡大委員会によって僅かな漁業活動しか関係しないという背景から困難であると判断された場合に考慮される。

It would require some form of decision by the Extended Commission to prohibit fishing in the CCAMLR Convention Area.

拡大委員会により、CCAMLR 条約水域における漁業の禁止のための何らかの決定が必要となる。

Option (iii)

選択(iii)

This option represents a possible response where the intent of the CCAMLR requirements is met, but without the CCSBT adopting any new systemic measures. The structure of the option is presented against the nine CCAMLR requirements set out in the background section of this agenda paper. An explanation for each proposal is shown in red type in brackets in each item.

このオプションは、CCSBTが新たな組織的対策を講じることなく、CCAMLRの要求の意図を 充たす場合に可能な対応である。オプションの構造は本資料の背景にある9つのCCAMLRの用件に対応している。個別の提案に対する説明はアイテム毎に括弧し赤字にて示す。

- the CCSBT authorised list would be provided to CCAMLR (This list is already maintained)
- 1. CCSBT 許可漁船リストを CCAMLR に提供(当該リストは既存)
- 2. the CCSBT would agree not to authorise any vessel on the CCAMLR IUU vessel list (The Secretariat would establish a routine in the authorised vessel list system that would prevent a vessel on the CCAMLR list from being added to the CCSBT list. There would be some costs associated with the arrangement's development.)
- 2. CCSBT は CCAMLR IUU 漁船リストに掲載された船舶へ許可を与えない(事務局は CCSBT 漁船リストに CCAMLR IUU リスト掲載漁船を追加することを予防する許可船 リストシステムをルーチンとして確立。取り極めの進展に関連していくらかコストがかかる。)
- 3. the CCSBT Secretariat would advise CCAMLR when a vessel was intending to fish in the CCAMLR Convention area and when the vessel had left the area. (A system for members to inform the Secretariat of these two dates would have to be set in place. It would not involve operating a VMS system during the time the member's vessel was in the CCAMLR Convention Area and would not be a real time system. Such an arrangement would inform CCAMLR of the fishing presence and its duration, which is the purpose of the VMS system.)
- 3. CCSBT 事務局は漁船が CCAMLR 条約水域において漁業を営もうとする時期と当該水域を離脱した時期を CCAMLR に通知する。(これら2つの日時を事務局に通知する加盟国のためのシステムを適切に配備しなければならない。加盟国の船舶が CCAMLR 条約水域内にいる間 VMS システムの運用をともなわず、リアルタイムシステムとはならない。 VMS システムが目的としている漁業の存在とその期間を CCAMLR に通知するという取り極めになる)
- 4. an undertaking would be given that any plastic packaging bands would not be jettisoned in the CCAMLR Convention area (The CCAMLR arrangement is to ban this packaging material for securing bait boxes in the Convention Area and with other restrictions on the use of similar packaging for other onboard purposes. A CCSBT offer not to dispose of the packaging material would secure the same outcome)
- 4. CCAMLR 条約水域においていかなるプラスチック製梱包バンドも廃棄しないことを保証する(CCAMLR の措置は条約水域においてエサ箱を保護するための梱包資材を禁止し、またその他船上の用途のための類似の梱包の使用を限定している。CCSBT は梱包用資材の廃棄を禁ずる提案をもって、同様の効果を担保)
- 5. the CCSBT would require Member vessels fishing in the CCAMLR Convention Area to observe the CCSBT's instructions on the application of tori poles and the general guidance given in its pamphlets on mitigating the impact of fishing on seabirds (This is not as comprehensive as the CCAMLR provision and would lack compulsion. It would not however require new

- arrangements to be adopted for seabird mitigation. Alternatively, the CCAMLR requirement could be mandated if members thought it appropriate and a reasonable extension of the existing CCSBT arrangement)
- 5. CCSBT は CCAMLR 条約水域で操業する加盟国の漁船にトリポール使用に関する CCSBT のインストラクションと海鳥に与える漁業の影響を軽減するためのパンフレットに与えられた一般的な手引きを守るよう求める。(これは CCAMLR 規則を包括するものではなく、強制力に欠ける。ただし、海鳥緩和のための新たな措置を求めるものではない。あるいは、CCAMLR の要求を、加盟国が適当であり現存する CCSBT 措置の合理的な拡張と考えるのであれば、義務付けしうる)
- 6. at the end of the fishing cruise in the CCAMLR Convention Area, the Secretariat would report on a 5°X5° basis the southern bluefin tuna catch, by-catch and incidental mortality of seabirds (This would require a new catch reporting arrangement to operated by the CCSBT with some costs. The masters of the vessels concerned would have to be instructed to record the necessary data as observers would not be present. However, some of this material is already collected, so the additional data requirement may not be too onerous)
- 6. CCAMLR 条約水域における航海の終了時に、事務局が 5×5 度基準でみなみまぐろの漁獲、混獲および海鳥の偶発的死亡率を報告(これは、費用をともない CCSBT が運用する新たな漁獲報告の取り極めが必要となる。当該船舶の漁労長は、オブザーバーがいない時のように、必要な情報を記録するよう指示される。一方、いくつかのデータは既に収集されており、追加されるデータ用件はそれほど負担とならないであろう)
- 7. the CCSBT would agree to vessel inspection (This offer would reflect the fact that vessel inspection in the CCAMLR area is already supported by the four members common to the two organisations)
- 7. CCSBT は漁船検査に合意(本提案は、CCAMLR 水域における漁船検査は両機関に共通する4加盟国が既に支持しているという実態を反映)
- 8. the CCSBT observer standards would apply (100% observer coverage would be very difficult in the circumstances of the southern bluefin tuna longline fishery in the Indian Ocean. Agreement to the catch reporting requirements in 6 above could be cited as a reason to relax this requirement of CCAMLR)
- 8. CCSBT オブザーバー基準の適用 (100%オブザーバー乗船はインド洋におけるみなみまぐろはえ縄漁業の環境では非常に困難。CCAMLR の用件を緩和する理由として、上記6の漁獲報告条件の取り極めに言及)
- 9. the various actions the CCSBT has undertaken and are currently in place would be explained (The response would cite all of the measures the CCSBT has taken Action Plan, Trade Documentation Scheme, Authorised Vessel List, etc as a demonstration of the CCSBT's determination to stop IUU fishing)
- 9. CCSBT が履行し現在機能している種々の活動の説明(回答は CCSBT の実行するすべての措置を列挙 行動計画、貿易証明制度、許可船リスト、その他 IUU 漁業を根絶せんとする CCSBT の決意表明として)

For consideration 検討のために

Prepared by the Secretariat 事務局作成文書

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Our Ref.: 8.22

8 November 1005

Mr Brian Macdonald Executive Secretary CCSBT PO Box 37 Deakin West ACT 2600

Dear Mr Macdonald,

Thank you for your letter of 19 October 2005 advising that the Commission for the Conservation of Southern Bluefin Tuna ('CCSBT') had agreed at its 2005 annual meeting that it should enter into an agreement with the Commission for the Conservation of Antarctic Marine Living Resources ('CCAMLR'). Your letter was discussed by CCAMLR at its annual meeting in October/November 2005.

CCAMLR noted that there is an overlap between the responsibilities of CCAMLR and CCSBT. CCAMLR is responsible for the management and conservation of all Antarctic marine living resources within the CAMLR Convention Area, while CCSBT has responsibility for the management and conservation of southern bluefin tuna throughout its range. CCAMLR therefore very much welcomed the approach from CCSBT to conclude an agreement to ensure that fishing activities in relation to southern bluefin tuna within the CAMLR Convention Area are appropriately managed and to clarify the respective roles of CCAMLR and CCSBT in this respect. In particular, CCAMLR would welcome the opportunity to discuss measures to reduce incidental mortality of CAMLR Convention Area seabirds due to fishing of southern bluefin tuna.

CCAMLR considered that the appropriate way to progress this matter would be the establishment of an ad hoc working group comprised of members from the CAMLR and CSBT Commissions, which would meet as soon as possible. The aim of the group would be to establish an agreement in relation to fishing for southern bluefin tuna within the CCAMLR Convention Area. CCAMLR would hope to have such an agreement as soon as possible.

In the interim, CCAMLR requires the following measures:

- (i) CCSBT will advise the CCAMLR Secretariat of the names, Flag States, owners, operators, call signs and Lloyds/IMO numbers of all vessels licensed by CCSBT Parties to fish for southern bluefin tuna;
- (ii) CCSBT will not license any vessels on the CCAMLR IUU Vessel Lists to fish for southern bluefin tuna (and CCAMLR will reciprocate should CCSBT adopt such lists);

- (iii) CCSBT will require all vessels licensed to fish for southern bluefin, in respect of fishing activities for southern bluefin tuna within the Convention Area, to:
 - (a) submit automatic satellite-linked VMS reports in accordance with Conservation Measure 10-04 to the CCSBT Secretariat;
 - (b) apply Conservation Measure 25-01 on use and disposal of plastic packaging bands;
 - (c) apply Conservation Measure 25-02 (minimisation of incidental mortality of seabirds), except those provisions relating to line weighting;
 - (d) submit to the CCSBT Secretariat data on catch, by-catch and incidental mortality of seabirds in a manner consistent with the data requirements of CCAMLR;
 - (e) comply with the CCAMLR System of Inspection, including allowing compliance inspections at sea within the CAMLR Convention Area;
- (iv) CCSBT will forward to the CCAMLR Secretariat all reports received under paragraph (iii) above.

Without prejudice to further development of the agenda for the working group, CCAMLR would also wish to discuss the following issues, with a view to concluding a final agreement as soon as possible:

- (i) effective measures to reduce the incidental mortality of seabirds, appropriate to the methods used to fish for southern bluefin tuna;
- (ii) observer coverage;
- (iii) illegal, unregulated and unreported fishing.

If the CCSBT is content with this approach, I would be grateful if you could contact me to discuss arrangements for a meeting.

Yours sincerely,

Dr Denzil G.M. Miller Executive Secretary



みなみまぐろ保存委員会

28 April 2006

Dr Denzil Miller Executive Secretary CCAMLR PO Box 213 North Hobart TASMANIA 7002

Dear Dr Miller

Thank you for your letter concerning an agreement between CCAMLR and the CCSBT over fishing for southern bluefin tuna in the CCAMLR Convention Area.

The management measures specified in your letter are significantly different to those applied by the CCSBT on its Members and Cooperating Non-members. In addition, the CCSBT has Members and Cooperating Non-members which are not members of CCAMLR. An agreement between the two organisations will therefore require detailed consideration by both Commissions and the matter has been listed by the CCSBT for discussion at a Special Meeting on 18-19 July 2006.

In these circumstances, I am unable to respond to your letter with a CCSBT position at this stage. I hope to be able to do so after the Special Meeting.

However, to facilitate further consideration of this matter I have listed below some observations on how the CCSBT might be able to respond to CCAMLR's requirements in the context of its current management measures. My observations respond to the numbering in your letter.

(i) The CCSBT maintains an authorised vessel list that would comply with CCAMLR's request except for the provision of a Lloyds/IMO number. However, the CCSBT register contains additional information such as length, tonnage and registration number that help to uniquely identify a vessel.

This list clearly identifies the vessel and is in the public domain. I would think that the CCSBT vessel list is sufficient for CCAMLR purposes.

The CCSBT vessel list includes vessels from the Fishing Entity of Taiwan and the Philippines, which do not have a relationship with CCAMLR. It would therefore be necessary for CCAMLR to accept that these vessels are authorised to fish for southern bluefin tuna in the CCAMLR Convention Area.

- (ii) The Convention for the Conservation of Southern Bluefin Tuna requires the Commission to cooperate with other regional fisheries organisations. The Commission's resolution establishing its authorised vessel list also provides for cooperative mechanisms. In this context, recognition of the CCAMLR IUU fishing vessel list could form part of a cooperation agreement.
- (iii) My comments on this element of your letter are made in a context where fishing in the CCAMLR Convention area for southern bluefin tuna is relatively minor. The northern boundary of the CCAMLR Convention area is generally well below the latitudes of commercial fishing for southern bluefin tuna by CCSBT Members and Cooperating Non-members. The CCSBT Secretariat's records of reported catch show that fishing in the CCAMLR Convention Area largely ceased by 1984 and that until 2004, the total southern bluefin tuna catch in most subsequent years was less than 1 tonne and every year had a total catch of less than 3 tonnes. There was a larger catch in 2004 of about 25 tonnes, mainly in the area 60-65° east, 45-50° south.
 - (a) CCSBT Members maintain VMS systems on their fleets but I am unable to comment on whether those systems are compatible with the requirements of CAMMLR's Conservation Measure 10-04. If the CCSBT Secretariat was to report to CCAMLR as suggested in your letter, it would require additional resourcing. An alternative might be for vessels fishing for southern bluefin tuna to report directly to CCAMLR using CCAMLR's existing arrangements and for CCAMLR to subsequently notify the CCSBT Secretariat.
 - Whatever arrangement might be agreed, it would require CCSBT consideration and decision. VMS has not been on the agenda of the CCSBT in recent years.
 - (b) The CCSBT has no equivalent conservation measure to CCAMLR's Conservation Measure 25-01. The issue is part of the terms of reference of the CCSBT Ecologically Related Species Working Group, where the broad issue of jettisoning waste has been discussed. However, the specific matter of plastic packaging bands has not been brought before the Working Group for attention.
 - It is my understanding that the CCSBT members have been participating in a generalised global response to fish responsibly including jettisoning material that is damaging to the environment. However, formal compliance with the terms of Conservation Measure 25-01 would require a decision by the CCSBT. I will therefore place the issue before the CCSBT at the Special Meeting in July 2006 as part of the appropriate agenda item.
 - (c) The CCSBT has put in place measures to mitigate the effects of fishing for southern bluefin tuna on associated seabirds. Use of tori poles was mandated in 1999 for any fishing below 30° south. A copy of the guidelines for implementing this decision are attached.
 - The CCSBT has also instituted a publicity campaign to educate fishers on seabird mitigation measures. This material has been circulated to all vessels fishing for southern bluefin tuna and has been produced in four languages. A copy of the text of the English version of this material is also attached.

These arrangements do not duplicate the CCAMLR provisions, which are far more elaborate. However, in the context of the very low level of fishing effort, they are targeting the same mitigation effect. Would it be possible for CCAMLR to accept that the CCSBT's arrangements are sufficient?

(d) Currently, in terms of catch reporting the CCSBT only requires monthly catch reports by Members and Cooperating Non-members. Monthly catch reports are not stratified by area and the system would have to be modified if fishing in the CCAMLR Convention Area was to be identified.

Comprehensive data on by-catch and incidental mortality of seabirds is not maintained by the CCSBT Secretariat.

To respond to CCAMLR in the form required for fishing in the CCAMLR Convention Area, would require a decision by the CCSBT. I will include the issue in the material to be prepared for the agenda item for the Special Meeting in July 2006.

- (e) The CCSBT does not have any provisions relating to systems of inspection. Compliance with this CCAMLR requirement will also need to be considered by the CCCSBT.
- (iv) If the CCSBT were to agree to implement the measures outlined in (iii) above, the CCSBT Secretariat could be the vehicle for the provision of that information.

Your letter raised two other matters, which have not been addressed in the comments outlined above – observer coverage and IUU fishing.

As regards observer coverage, the CCSBT has asked the CCSBT Secretariat to prepare a discussion paper on the establishment of an International Observer Program. This will be considered by the CCSBT at its next Annual Meeting in October 2006.

The CCSBT has instituted a number of measures to prevent IUU fishing of southern bluefin tuna:

- Agreement to an Action Plan which is aimed at identifying unauthorised catch and provides for trade restrictive action to be taken against identified counties.
- Implementation of a trade documentation scheme which requires all exports of southern bluefin tuna to be accompanied by a CCSBT trade document
- The maintenance of a list of vessels authorised to fish for southern bluefin tuna, which provides only for listing by Members and Cooperating Non-members. CCSBT trade documents are invalid if the fish have not been caught by a vessel on the CCSBT approved list. Fish caught by vessels not on the list are deemed by the CCSBT to have been caught illegally and Members and Cooperating Non-members are not permitted to import the product.

At the CCSBT's last Annual Meeting in October 2005 the CCSBT discussed reports of anomalies in Japanese market data and Australian tuna farming operations, which may suggest some unreported fishing. Reviews have been initiated to assemble and analyse all available information and the outcome of these reviews will be discussed at the CCSBT Special Meeting in July 2006.

In all of these circumstances I suggest we wait until after the CCSBT Special Meeting before initiating any further work on an agreement between CCAMLR and CCSBT. At this time I will have the CCSBT's considered view on the issues CCAMLR has raised.

Yours Sincerely

Brian Macdonald

Executive Secretary

Burn Mardanda