

**Commission for the Conservation of  
Southern Bluefin Tuna**

**PART TWO**

**Report of the Independent Expert**

**September 2008**

# 1 Introduction

In October 2006, the Commission on the Conservation of Southern Bluefin Tuna (CCSBT or Commission) decided to undertake a review of its performance. The CCSBT has embarked on this performance review, using a recommended common set of criteria and a methodology that was agreed, in principle, at a meeting in Kobe, Japan of the five Regional Fisheries Management Organizations (RFMOs) that manage the world's fisheries for tunas and other highly migratory species. Part of the agreed methodology for such performance reviews was a commitment to involve "outside experts" – individuals who were neither associated with any of the member governments of the RFMO in question nor worked for the RFMO secretariat.

In July 2008, a "Performance Review Working Group" created by the CCSBT produced a "Self Assessment" of the performance of the CCSBT.

The CCSBT also selected an independent expert to review the Self Assessment and other information relevant to the performance of the Commission. The present report is thus intended to serve as a commentary on the CCSBT Self Assessment and to offer some suggestions and recommendations of its own for improving the performance of the CCSBT. This report attempts to respond to the request of the CCSBT that it should focus on:

- a. The standard at which the CCSBT is currently operating and whether, in terms of outcomes, it satisfies current international best practice;
- b. The current mandate of the CCSBT and whether it corresponds with international best practice;
- c. Whether the comments and recommendations in the self assessment are appropriate and, if implemented, whether they would be sufficient to improve CCSBT's performance;
- d. Views on the priority of the comments and recommendations in the CCSBT self assessment; and
- e. Any additional comments or recommendations on how the CCSBT's performance can be improved for the CCSBT to consider further.

The CCSBT deserves praise for undertaking its first performance review, for its use of the recommended set of criteria, for its willingness to involve an independent expert and for the detailed and analytical nature of the Self Assessment. While the author of this report has not had direct experience with the operations of the CCSBT and is accordingly less familiar with the

internal dynamics of the Commission, it is hoped that this report can complement the Self Assessment by offering a different, and fully disinterested, perspective.

## 2 General Comments

At the outset, it should be noted that in the modern world the CCSBT, like other RFMOs, has a “dual mandate.” The original part of the mandate of an RFMO derives from the international agreement that created it; in the case of the CCSBT, that is the 1994 Convention for the Conservation of Southern Bluefin Tuna (the Convention). The objective of the Convention, and hence that original mandate of the CCSBT, is “to ensure, through appropriate management, the conservation and optimum utilization of southern bluefin tuna.”<sup>1</sup>

The second part of the dual mandate of the CCSBT and other RFMOs derives from commitments that member States of RFMOs have made in other international agreements or in other international fora to accomplish certain objectives *through their participation in RFMOs*.

In some cases, those commitments are legally binding on the RFMO members. Most members of the CCSBT, for example, are also States Parties to the 1995 UN Fish Stocks Agreement (UNFSA), which contains a number of provisions, some of which are discussed in more detail below, that require such States to take (or to refrain from taking) certain actions as members of RFMOs. Article 10 of the UNFSA, for example, requires States Parties to use RFMOs to fulfill certain functions.

States have also made commitments in a growing number of soft-law instruments to pursue certain objectives through the RFMOs in which they participate. These instruments include, but are not limited to:

- The 1995 FAO Code of Conduct for Responsible Fisheries;
- The four FAO International Plans of Action (on Capacity Management, Sharks, Seabirds and illegal, unreported and unregulated (IUU) Fishing) and other similar FAO instruments;
- Various recent Ministerial Declarations and other high level statements; and
- Relevant resolutions of the UN General Assembly.<sup>2</sup>

The Self Assessment reveals that the CCSBT has struggled to fulfill its original mandate relating to the conservation and optimum utilization of southern bluefin tuna (SBT). As detailed below, the Self Assessment paints a picture of an RFMO confronting very significant challenges and

---

<sup>1</sup> Article 3, the Convention.

<sup>2</sup> A helpful summary of the mandates of RFMOs in the modern world can be found in Recommended Best Practices for Regional Fisheries Management Organizations (Chatham House, 2007).

meeting with only limited success. Of especially grave concern is the acknowledgement that serious overfishing of SBT and under-reporting of SBT catches in past years has both undermined the health of the resource and significantly compromised the time series of data on which the CCSBT must make future management decisions. Even before the serious overfishing and under-reporting of SBT catches came to light, the inability of the CCSBT to reach agreement in many years on even the most basic management measure for a single fish stock – a total allowable catch or TAC – calls into question the political will of its member States to make the decisions necessary to ensure sustainable fishing.

With respect to fulfilling the second part of the CCSBT's mandate, the Self Assessment indicates that the CCSBT has made progress in some areas (e.g., the adoption of a Trade Information Scheme, an initial Vessel Monitoring System measure, an initial measure on transshipments), but has made very little progress in other areas. For example, the Commission has adopted few measures to:

- Manage total fishing capacity for SBT;
- Establish integrated measures for monitoring, control and surveillance;
- Prevent, deter and eliminate IUU fishing through the full range of available tools;
- Require vessels fishing for SBT to minimize the impacts of their operations on ecologically related species (e.g., sharks, sea turtles, seabirds, billfishes, etc.)

On the other hand, many of the recommendations set forth in the Self Assessment would, if implemented promptly and fully, represent meaningful steps forward in helping the CCSBT modernize its operations and fulfill its dual mandate.

Although the Convention entered into force less than 15 years ago, it nevertheless predates a number of key developments in the norms and standards for the management of international fisheries. At its core, the Convention is an agreement for the management of a single fish stock. The Convention lacks many elements that are found in such instruments as the UNFSA, the Convention for the Conservation of Highly Migratory Fish Stocks in the Western and Central Pacific Ocean, and the Antigua Convention, to name just a few. The CCSBT Convention does not reflect concepts such as the precautionary approach, the ecosystem approach and other norms that guide fisheries management today.<sup>3</sup>

One consequence is that the CCSBT has experienced disagreements among its members concerning the Commission's mandate. In 2007, for example, the CCSBT could not reach agreement on whether the Commission had the authority to adopt binding measures concerning species that are ecologically related to SBT.

---

<sup>3</sup> The CCSBT has nevertheless incorporated some elements of the precautionary approach in its management of SBT through its Management Procedure.

Faced with similar problems, some other RFMOs (such as the Inter-American Tropical Tuna Commission and the Northwest Atlantic Fisheries Organization) have taken steps to amend or even renegotiate the international agreements that established them in order to bring them into line with modern standards for fisheries management. These efforts, though time-consuming and labor-intensive, will undoubtedly aid those RFMOs in the long run.

As discussed below, the CCSBT faces some very substantial, immediate problems. It should nevertheless take a hard look at its Convention, compare it to more modern instruments, and seriously consider the need to amend or renegotiate it. If the CCSBT concludes that the time is not ripe to undertake such an initiative, it should nevertheless be possible to incorporate many of the modern standards for fisheries management into the work of the Commission in other ways, including through the adoption of additional conservation and management measures and updated Management Procedure.

### **3 Specific Comments**

This section reviews each of the five topic areas covered by the Self Assessment, which in turn correspond to the recommended criteria for RFMO performance reviews: conservation and management, compliance and enforcement, decision making and dispute resolution, international cooperation, and financial and administrative issues.

#### **3.1 Conservation and Management**

This section of the Self Assessment includes a very helpful – and very telling – timeline of key events in the history of CCSBT. Following entry into force of the Convention in 1994, the CCSBT was able to reach agreement on a TAC and quota allocations among its three original members (Australia, Japan and New Zealand) the very next year (for the fishing year 1995-96). The following year, the CCSBT also agreed on a TAC and quota allocations, as well as on a data collection and exchange program and certain other measures.

Beginning in 1997, however, trouble arose. The CCSBT did not agree on a global TAC or quota allocations for the fishing years 1997-98, 1998-99, 1999-2000, 2000-01, 2001-02 or 2002-03. During this period, the Commission did make limited progress in certain other areas, including the creation of an independent panel of scientists and independent chairs for its scientific committees and the adoption of a Trade Information Scheme (TIS) in 2000.<sup>4</sup>

---

<sup>4</sup> During this period, Australia and New Zealand brought a dispute against Japan relating to southern bluefin tuna. Although the International Tribunal for the Law of the Sea prescribed certain provisional measures, an arbitral panel

The situation seems to have improved in 2003. By that year, the Republic of Korea had joined the CCSBT and there was also created an “extended” Commission to facilitate the participation of Taiwan. In 2003 and 2004, the CCSBT reached agreement on TACs and quota allocations for its members and certain non-members, and made progress in developing a comprehensive “management procedure” that the Commission ultimately adopted in 2006.

In 2005, however, the CCSBT received advice from its Scientific Committee that the stock of SBT was deteriorating, that at current catch levels there was a 50 percent chance that stock levels would decline to zero, and that only very significant reductions in the TAC would result in a 50 percent probability of avoiding further decline. Despite this daunting advice, the CCSBT could not reach agreement on a TAC nor any reductions in catch levels. Instead, members and cooperating non-members merely promised that their individual catch levels would not exceed those from the previous year.

In 2006, the CCSBT faced a true crisis. As described in the Self Assessment, the CCSBT “considered information that catches over the past 10-20 years may have been substantially under-reported and the implications that had for the historical data record maintained by the CCSBT.” This revelation of substantial under-reporting of catches may have seriously compromised the data on which the Commission must make decisions even now and well into the future.

Perhaps chastened by this crisis, the CCSBT agreed in 2006 to a global TAC and national allocations that included a reduction in the Japanese allocation from 6,065 tons to 3,000 tons (quota set for five years until at least 2011, pending a review). The following year, the CCSBT set a global TAC and allocations for the 2008-09 period.

The Self Assessment indicates that the CCSBT is struggling to reduce the uncertainty in the data on which the SBT stock assessment is based. At present, though, the CCSBT still faces glaring problems arising from the compromised data, including the admission in the Self Assessment that “it is not possible to determine the exact trends in the status of SBT over time.”

For an RFMO with a fairly small membership whose original mandate is limited to ensuring the conservation and optimum utilization of a single fish stock, this is quite a disturbing state of affairs.

On a positive note, however, the membership of CCSBT has grown in recent years such that the members and cooperating non-members of the Commission now represent virtually all fishing activity for SBT. With all the relevant players at the table, the CCSBT at least has an opportunity to create a better future for SBT and those whose livelihoods depend on that resource.

The members and cooperating non-members of the CCSBT also have the opportunity to reverse years of inaction in fulfilling the second part of the CCSBT's dual mandate.

For example, all members of the CCSBT have made commitments of various kinds to use the CCSBT to address impacts of fishing activity for SBT on other species that are associated with or dependent on that stock. The Self Assessment confirms that "seabirds, sharks, marine mammals and other tuna species are known to interact with both purse seine and longline SBT fisheries." It is also commonly known that longline fisheries incidentally take sea turtles.

The CCSBT has created an Ecologically Related Species Working Group (ERSWG). That group has not assessed the status of any such species, but has rather limited its activity to reviewing documents from members and observers. The ERSWG similarly has not investigated trends in the status of such species, nor (with one exception) made any recommendations to the Commission regarding the conservation or management of such species.

The one exception is that, as early as 1997, the CCSBT required the mandatory use by its members and non-members of tori lines in all longline SBT fisheries south of 30 degrees south latitude and later adopted a set of Guidelines for Design and Deployment of Tori Lines. But the Commission has not taken any other steps set forth in the FAO International Plan of Action for reducing seabird mortality in longline fisheries. As recently as 2007, the CCSBT could not reach agreement on draft recommendations on data collection, on reducing the bycatch of seabirds, or on the conservation and sustainable utilization of sharks. The CCSBT seems not to have considered, much less adopted, any measures to reduce sea turtle bycatch in fisheries for SBT, despite the 2004 FAO Guidelines to Reduce Sea Turtle Mortality in Fishing Operations. The ERSWG has only published educational pamphlets on sharks and seabirds for fisheries involved in SBT fisheries.

## **Comments and Recommendations**

### *General*

The Self Assessment candidly acknowledges that, in light of the "estimates of depletion of the spawning stock biomass ... the CCSBT has not been successful in managing SBT." That conclusion is unfortunately inescapable, given that "the SBT spawning stock is at a low fraction of its original biomass and well below the 1980 level as well as below the level that could produce maximum sustainable yield."

The Self Assessment also states that the uncertainty regarding past catches has compromised the data holdings and significantly diminished the utility of that data in developing accurate stock assessments on which to base management decisions. Both statements appear to be all too true.

The Self Assessment suggests that the best course of action for the CCSBT may be to focus primarily on “periodic full assessments of the SBT stock and on establishing a rebuilding strategy.”

For SBT, the most immediate need in the short term would be to develop the most accurate stock assessment possible in light of the uncertainties caused by the under-reported past catches, then to set catches (i.e., the global TAC) at a level that will allow the stock to rebuild. The CCSBT should take a precautionary approach in this regard: the greater the uncertainty of the stock assessment, the lower the TAC should be set.

### *Capacity Management*

The CCSBT seems to operate on the assumption that agreement on a global TAC with national allocations is a sufficient basis for achieving sustainable catch levels for SBT fisheries. The Self Assessment indicates little if any attention paid to the issue of managing fishing capacity, which is certainly a problem that other RFMOs are trying to address. Since excess capacity, among other things, creates pressure to disregard scientific advice in setting a global TAC, the CCSBT should at very least implement the recommendations set forth in the FAO International Plan of Action on the management of fishing capacity.

The Self Assessment makes no such recommendation. Indeed, it states that “management measures associated with capacity reduction are best left to members’ domestic arrangements.”

With respect, other RFMOs that have relied on the political will of individual members to manage their own fishing capacity in fisheries for shared stocks have encountered very real problems of overcapacity.

### *Ecologically Related Species*

While managing SBT may be the highest priority, the CCSBT cannot ignore its other responsibilities, including those with respect to ecologically related species. In this regard, the Self Assessment recommends that the CCSBT should “develop and implement a strategy to address the impacts of SBT fisheries including the collection and sharing of data between CCSBT members and Secretariats of other RFMOs.”

This recommendation may be a place to start. However, the CCSBT then must move promptly to reduce the impacts of SBT fisheries on ecologically related species, including sharks, seabirds, sea turtles and other tuna species. Experience has shown that the most effective way to reduce such impacts is through binding measures implemented by all RFMO members and cooperating non-members. Any CCSBT members who may still doubt that the Commission has a mandate to adopt such measures should recall the commitments their governments have made in other fora to use the CCSBT and other RFMOs for just such purposes.



### *Data Collection and Sharing*

The Self Assessment outlines in considerable detail the mechanisms for data collection and sharing that the CCSBT has adopted. It does not always make clear, however, the extent to which CCSBT members and cooperating non-members are complying with their obligations in this regard.

The Self Assessment does note that one cooperating non-member, the EC, has informed the CCSBT that the EC will not implement the CCSBT Trade Information Scheme (TIS) and will not comply with the monthly catch reporting procedures. The Self Assessment does not indicate whether or how the CCSBT has responded. In light of the fact that the European Union and most of its Member States have adhered to the UNFSA, the CCSBT could refer the EC to Article 8(4) of that Agreement. That provision states clearly that, to have access the SBT resource, the EC must either be a member of the CCSBT or agree to apply the conservation and management measures of the CCSBT.

The Self Assessment suggests that the suite of data collection and sharing obligations of CCSBT “would seem, in principle, to be sufficient for management of the fishery.” It acknowledges, however, that these obligations have “not been implemented very well.”

The recommendations contained in the Self Assessment to improve data collection and sharing appear to be sound. Two of them merit special mention.

First, as discussed at the Kobe meeting of the five tuna RFMOs, there is a need for all of those RFMOs to harmonize their data collection and sharing regimes. The CCSBT should certainly participate in this effort.

Second, the Self Assessment states that the TIS “is at present of probably only limited value because [it] does not incorporate all catches.” In particular, the TIS does not cover “domestic catch” landed in the flag State. This issue, too, was discussed at Kobe, with a view to recommending that the tuna RFMOs, including the CCSBT, move promptly toward full catch documentation schemes (CDS). The CCSBT spent considerable time in 2007 trying to develop a comprehensive CDS for SBT, but was unable to reach agreement. Australia and Japan have advised the Commission that they will each implement their own CDS for SBT on a trial basis, which may improve the chances that the CCSBT can adopt its own comprehensive CDS in the near future. That should certainly be a priority goal.

### *Other*

With respect to the quality and provision of scientific advice, the CCSBT appears to have created mechanisms that are working well in practice. The Self Assessment recommends that the current structure of the Extended Scientific Committee, independent chairs and advisory panel should be maintained. That would appear to be a sound judgment.

The Self Assessment nevertheless also recommends that the scientific effort within the CCSBT structure achieve a better balance between its work on SBT and its work (so far very limited) on ecologically related species. That judgment, too, deserves support.

The CCSBT should also move promptly to adopt and implement measures to minimize pollution, waste, discards or catch by lost and abandoned gear, as required of States Parties to the UNFSA.

### **3.2. Compliance and Enforcement**

The CCSBT created a Compliance Committee in 1997 and initiated its TIS in 2000. For the most part, however, the CCSBT only began to grapple seriously with compliance and enforcement issues in the past few years. As outlined in the Self Assessment, the CCSBT has taken some initial steps to improve compliance and enforcement, but still lags behind many other RFMOs in this area.

The revelation of serious overfishing and under-reporting of SBT has understandably prompted the CCSBT and its members to seek better mechanisms for monitoring catches and for ensuring accurate reporting. To this end, Japan has instituted a number of changes in its domestic management system for SBT. The Commission as a whole does not yet have in place a robust suite of measures for this purpose.

Like other tuna RFMOs, the CCSBT has an authorized vessel list and is considering the adoption on an IUU vessel list. As discussed below, the CCSBT has taken some steps toward the creation of common VMS requirements, at-sea transshipment controls and has a Scientific Observer Program Standard.

The only Port State Measure adopted by the Commission so far is a prohibition on landings of SBT by vessels that are not on the authorized vessel list. The 2003 FAO Model Scheme on Port State Measures to Combat IUU Fishing recommends a range of additional measures, which many RFMOs have begun to adopt. As the Self Assessment notes, there is also under negotiation a new binding international agreement on Port State Measures (many CCSBT members are participating actively in that negotiation). But that new agreement may not enter into force for several years. In the meantime, the CCSBT should move to adopt a broader set of Port State Measures designed to prevent the landing and transshipment of illegal, unreported and unregulated SBT catches – including by vessels on the CCSBT authorized vessel list.

Although most CCSBT members require their vessels to use satellite-based vessel monitoring systems (VMS) and despite the adoption in 2006 of a CCSBT resolution committing members and cooperating non-members to adopt an integrated VMS system, the CCSBT still does not have such a system in place. The Commission should institute one promptly.

Similarly, despite a recognition – within the CCSBT and elsewhere – that unmonitored transshipment at sea can provide a means for evasion of RFMO rules, and despite the adoption in 2006 of a resolution seeking to establish controls on at-sea transshipment, a number of CCSBT members have not met the deadlines for action set forth in that resolution. The CCSBT has not yet implemented a regional observer program (despite a July 2008 deadline for doing so), nor has it adopted rules for implementing requirements relating to high seas boarding and inspection set forth in the UNFSA. The Self Assessment suggests that the absence of a CCSBT “convention area” means that implementation of boarding and inspection rules “would be complex because they would cover all oceans.” That is not a good reason for failing to have such rules, given the clear requirements of the UNFSA.

The CCSBT TIS appears to be working reasonably well with respect to catches of SBT that actually enter international trade. As noted above, however, the scope of the TIS does not include catches of SBT that do *not* enter international trade. The CCSBT should thus continue to move forward smartly toward the adoption and implementation of a full CDS.

### 3.3 Decision-Making and Dispute Resolution

The Convention requires the CCSBT to take all decisions (substantive and procedural) by unanimous vote of the Parties present at a Commission meeting. Some other RFMOs also have consensus-based decision-making, particularly those with relatively few members. Other RFMOs follow other approaches.

The primary advantages of consensus-based decision-making are that it (1) protects the interests of minority views within an RFMO; and (2) should yield greater ownership of – and hopefully greater compliance with – measures adopted by the RFMO.<sup>5</sup>

The primary disadvantage of consensus-based decision-making is that it can lead to measures based only on the lowest common denominator of agreement, or even to stalemate within an RFMO.

The Self Assessment correctly notes that any significant change in the CCSBT’s mode of decision-making would require amending the Convention. If the CCSBT embarks on amending the Convention, a variety of other models for decision-making methods now exist from which it might choose.

Similarly, the CCSBT’s rules for dispute settlement are also embedded in the Convention. As noted above, those rules received significant scrutiny in the context of the *Southern Bluefin Tuna case (Australia and New Zealand v Japan)*.

---

<sup>5</sup> In the case of the CCSBT, unfortunately, consensus-based decision-making did not prevent significant overfishing and under-reporting of SBT catches.

With the entry into force of the UNFSA in 2001, however, an additional set of dispute settlement rules now apply to disputes concerning the interpretation or application of the Convention, including a dispute concerning the conservation and management of SBT, at least vis-à-vis States Parties to the UNFSA.<sup>6</sup> In light of this development, it may not be necessary for the CCSBT to amend the Convention to achieve a compulsory and binding regime for the settlement of disputes.

### **3.4 International Cooperation**

This section of the Self Assessment provides a very useful summary and timeline of the CCSBT's efforts to cooperate with those States that fish for SBT but which were not members of the Commission, and of the work of the CCSBT with other tuna RFMOs. CCSBT's efforts to cooperate with non-member States have borne fruit, as the Republic of Korea and Indonesia have since acceded to the Convention, while others have joined the list of cooperating non-members. Further, CCSBT took a novel approach to providing a way for Taiwan, which also fishes for SBT, to participate fully in the Commission's work and to be legally bound to its measures through the creation of the Extended Commission and the Extended Scientific Committee in 2001.

#### *Comments and recommendations*

On the issue of transparency, it is clear from the Self Assessment that CCSBT has made important strides in this area in the last several years, such as through the publication of all of its reports. An examination of the CCSBT website confirms the availability of such reports and other documents relating to the decisions of the CCSBT. However, while the Self Assessment notes that in recent years the CCSBT has afforded interested observers from intergovernmental organizations (IGOs) and non-governmental organizations (NGOs) the opportunity to participate in CCSBT meetings, and that the CCSBT has never turned down a request from an IGO or NGO to participate as an observer, the current CCSBT rules are quite restrictive and do not accord with current standards of international best practice regarding transparency.

Article 12 of the UNFSA establishes the standard for RFMOs regarding transparency in their activities. Article 12(2) prescribes that procedures adopted by RFMOs should not be "unduly restrictive" in affording IGOs and NGOs the opportunity to take part in RFMO meetings. The current CCSBT rules and procedures (Rule 3) on observers appear to create an unduly restrictive process to admit such observers that is not in line with other tuna RFMOs. For example, both WCPFC and ICCAT have a 50-day application period (half of what CCSBT requires). The WCPFC and ICCAT will admit observers unless a majority of members are opposed. By contrast, CCSBT rules allow a single member to successfully block the participation of an observer. As these rules are not in keeping with the spirit of current international fisheries

---

<sup>6</sup> UNFSA Article 30(2).

governance frameworks, the CCSBT should consider modernizing Rule 3 of its rules of procedure.

The Self Assessment also describes CCSBT's mechanism for accepting cooperating non-members, which provides for their full involvement in the RFMO, including receiving a catch allocation. The Self Assessment reports that all the main coastal States and fishing nations or entities are now either members of the Commission or cooperating non-members. While the Self Assessment notes that the 2000 CCSBT action plan has not been invoked at the past two meetings (2006 and 2007), which can apply trade restrictive or other measures to cooperating non-members if they are found not to have fulfilled their commitments, it does not make clear the extent to which all cooperating non-members are complying with the adopted conservation and management measures, providing required data, etc. Nevertheless, the recommendation of the Self Assessment appears appropriate.

With respect to the relationship of CCSBT to non-cooperating non-members, the Self Assessment's review and recommendation also appears sound.

With respect to CCSBT's efforts to cooperate with other RFMOs, the Self Assessment's analysis and suggested course appears sensible. However, the CCSBT should add combating IUU fishing activities to the list of cross-cutting issues affecting all tuna RFMOs, as well as monitoring and regulating transshipment, particularly given CCSBT's geographical overlap with the Indian Ocean Tuna Commission and the Western and Central Pacific Fisheries Commission (WCPFC).

### **3.5 Financial and Administrative Issues**

The Self Assessment briefly describes the financial and administrative functions of the CCSBT, and concludes that the CCSBT is adequately funded and has been efficiently and cost-effectively operated. The financial regulations and controls and the staff regulations for the secretariat have been in place in excess of ten years, which, along with the Finance and Administration Committee that advises the CCSBT on finances, expenses, the budget, and member contributions, demonstrates that the institutional capacity for managing the financial and administrative functions of the CCSBT is adequate.

In terms of efficiency and cost-effectiveness, the Self Assessment provides that, in comparison to two other tuna RFMOs (the International Commission for the Conservation of Atlantic Tunas and the WCPFC) that are roughly analogous to CCSBT, the selected RFMOs are relatively proportionate in number of staff, size and value of fishery and expenses. While this is inherently a difficult comparison, it does suggest that the CCSBT manages to do approximately as much with its funds as do ICCAT and WCPFC.

The Self Assessment acknowledges that implementation of at least some of the recommendations it contains – such as a comprehensive CDS or a centralized VMS regime – would entail some expansion in the role of the Secretariat, which would in turn require additional resources. If the

CCSBT does implement these recommendations, its members should make such resources available to the secretariat.

The Self Assessment does not indicate whether the CCSBT has always received full and timely payment of contributions from its members. If it has, the members and the CCSBT deserve recognition for their commitment to supporting the operation of the CCSBT. If it has not always received full and timely payment, a discussion of what has led to that situation, what problems it might have created for carrying out the operations of the CCSBT, and what could be done to prevent the problem in the future could be useful.

## **4 Conclusion**

It is hoped that this report will assist the CCSBT and its members in considering possible improvements in the work of that Commission.