

## **Proposal to monitor and verify Southern Bluefin Tuna caught by All Members in Japanese Market and the global distribution.**

### **- Explanatory Note**

At the 17<sup>th</sup> meeting of the Compliance Committee (CC) last year, the external expert, commissioned to analyze verification of Southern Bluefin Tuna (SBT)'s distribution, proposed an alternative approach to a Market Formula for the verification (See CCSBT-CC/2210/19). It is called "Correspondence Approach".

In accordance with paragraphs 96 and 97 of the Report of the 29<sup>th</sup> meeting of the Extended Commission (EC) and the paper CCSBT-EC/2210/20 which Japan submitted to EC 29 in 2022, Japan developed detailed proposals to monitor and verify SBT caught by all Members present in the Japanese market and the global distribution. These proposals were made while taking into consideration the advice provided in the external expert's report.

For the proposed work to be initiated intersessionally so that some of the outcomes can be reported at the upcoming annual meeting in October this year, Japan would like to ask for Members' intersessional agreement on the proposed work below.

### **- Proposed Work**

Japan proposes detailed works below to be conducted, in accordance with the timeframe specified in attachment A).

#### ***1. Improvement in monitoring and verification of Southern Bluefin Tuna caught by All Members in Japanese market.***

##### **1.1 Annual verification with Catch Documentation Scheme (CDS) data and different data sets for improvement of monitoring of Southern Bluefin Tuna**

(1) CDS obliges Members to accurately record and report necessary information at each stage so that utilization of the CDS data theoretically makes it feasible to monitor all SBT landed and imported into the Japanese market. Moreover, it is also significant in monitoring the global trade distribution.

(2) On the other hand, cross-checking CDS data may provide insights into SBT's trade distribution to find out potential issues of monitoring and control measures including CDS. In addition to cross-checking, discussion on the identified issues can guarantee and heighten the accuracy of CDS data and the credibility of CCSBT's management scheme.

(3) Therefore, based on "Correspondence Approaches" proposed by the external expert, it

is proposed that the Secretariat cross-check and analyze CDS data with different existing data sets, including trade statistics and management tag survey, in the following manners in cooperation with relevant Members. The outcome of the analysis will be reported to the Compliance Committee for discussion and, if so agreed upon at the Compliance Committee, published on CCSBT's public website in an easily understandable manner, following the confidentiality rule.

(4) This work will assist members to identify areas for improvements in its monitoring and control measures, including possible amendments on CDS Resolution and developments of new methods for further transparency of the SBT market.

A) Catches of each Member and its exports to Japan by fishing seasons, using CDS, national reports of catch, and trade statistics.

B) Proportion of imports in the Japanese market (Correspondence Approach #1) by product types (Fresh Wild, Fresh Farmed, Frozen Wild and Frozen Farmed), using CDS, management tag survey and questionnaire to trade companies.

C) Imports (Fresh and Frozen) by each Member (Correspondence Approach #2), using CDS and trade statistics.

D) Proportion of SBT (Frozen Wild, Frozen Farmed and Fresh) sold in major markets (Toyosu and Yaizu) in SBT landed and imported into Japan (Correspondence Approach #3), using CDS, management tag survey and questionnaire to trade companies.

E) Import of farmed SBT from Australia into Japan (Correspondence Approach #4), using CDS and FRDC Seafood Production and Trade Databases.

F) Comparison between weight data of individual SBTs, using CDS and management tag survey. It should be noted that this work has been done by the secretariat (see CCSBT-CC/2210/13, for example).

(5)The following points should be noted, taking into account the availability of the necessary data sets and the limited resources.

A) The analysis does not require the complete correspondence between CDS and different data sets, as advised by the external expert.

B) The outcome of the ongoing analyses, C) and F) of (3) above, will be reported at CC18. Because of the availability of the necessary data sets and the limited timeframe, new analysis, A), B), D) and E) of (3) above, are not expected to be completed by CC18. However, the specifications on those new analysis, including what the outcome of the analysis will look like, will be presented to CC18 for discussion. It is expected that

the Secretariat can conduct all the analyses above and report the outcomes at CC19.

- C) Although the external expert proposed two more correspondence approaches (#5 and #6) in addition to the six analyses described in (3) above, we propose that we focus on the six approaches in (3) first, considering the amount of work required and the usefulness of the outcomes of the analyses. More analyses can be conducted if so agreed by Members in the future.

## **1.2 Utilization of electronic data accumulated in eCDS (electronic CDS) for traceability**

- (1) eCDS will be fully introduced in near future and accumulate great amounts of electronic data relevant to SBT distribution in the global market including Japan's. The transparency and traceability of SBTs' trade distribution can be further improved by utilizing the data and enabling those involved in the trade to see certain information of the traded SBT, including the origin and the time of catch.
- (2) For example, retailers will be allowed to check the origin of the SBT which it bought. It can provide incentives for fishermen and retailers/traders to ensure landing and trading of SBT accurately attached with management tags to the extent possible and recording and reporting accurate information to eCDS.
- (3) Therefore, it is proposed that the secretariat explore and identify the technical feasibility and other issues, including costs, for the establishment of "Open-access CCSBT's webpage to search SBTs". The outline of this activity is as follows.
  - A) Open-access CCSBT's webpage, which is appropriately linked to the database of eCDS with the confidentiality rule followed, will be established so that those who pre-register for the use can access the page and search the traded SBTs with the corresponding numbers of the management tags.
  - B) They, including retailers, can find out the pre-designated types of information of the SBTs, the tag number of which are entered in the page, including the area (CCSBT's statistical area) and time of the catch. The type of information visible will be pre-determined in accordance with confidentiality rules. Access to other information captured by the CDS will not be allowed.
- (4) The result is expected to be reported, if possible, at CC18 and EC30 for their discussion. If they decide to develop this webpage, they will give the instruction to Secretariat to propose detailed specifications and the cost to CC19 and EC31 for their discussion. The webpage will be installed after the full installation of eCDS.

## ***2. Review of issues related to the Market Formula, indicated by the external expert***

- (1) The external expert, in her report (CCSBT-CC/2210/19), indicated that some parameters used in the market formula contain high uncertainty, such as the proportion of SBT traded in markets, the proportion of amounts of SBTs traded in Tokyo (Toyosu) and Yaizu to those traded in all Japanese markets, and possibility of double-counting within markets and between markets. As the information and data necessary for adjusting such high uncertainty is not available, she recommended that the Market Formula be no longer used for verification of SBT catch.
- (2) However, Japan thinks that the accumulated information obtained through Japanese market surveys, including questionnaires to trade companies, can possibly be used for updating some of these parameters with yearly variable values.
- (3) In addition, it is possible that some of the parameters with uncertainty would not significantly affect the final results coming from the market formula.
- (4) Therefore, it is proposed that Japan comprehensively review the points indicated by the external expert and report the result at CC18, including the influences of the parameters with uncertainties on the final results and possible update of some of the parameters using available information.
- (5) As the external expert did not update the current formula and proposed the alternative approach, it is appropriate to refrain from using the current market formula for verification of the trade and distribution of SBT. Nonetheless, we suggest that it would be possible for Members to consider a new contract with an external expert for updating the formula if the outcome of the review mentioned above is positive and the budget is available.

## ***3. Further enhancement in collection of data in relation to Non-Members' catch and trade of SBTs***

- (1) The secretariat has reported global trade of SBT with data coming from CDS and UN Comtrade, and asked Non-Members with certain trades of SBTs to attend the annual meetings and cooperate, including voluntary provision of CDS forms (see CCSBT-CC/2210/14, for example).
- (2) In addition to the above, in order to further gather data on Non-Members' catch and trade of SBTs, it is proposed that the chair of the Extended Commission or the Executive Secretary issue the letter to call on Non-Members which have caught or traded a certain amount of SBTs to apply for the status of Other State/Fishing Entity Cooperating in the

CDS (OSEC). The letter may indicate that Non-Members without such a status can not be allowed to access eCDS which will be fully installed in near future. The threshold amount can be 100 MTs of SBT catch or trade for two years in a row, as CC16 agreed that the Secretariat would highlight any export markets that imported more than 100MTs of SBT for two years in a row (paragraphs 100 and 101 of the report).

**4. *Review of necessity to improve specification of management tag***




- (1) The 28<sup>th</sup> EC revised the instruction on management tags in order to improve the readability of the tags in commercial flows. It can help monitor distributed SBTs. If the readability does not improve after the implementation, it should be considered to improve the specification of management tag, which is specified in the CDS Resolution.
- (2) Therefore, it is proposed that the secretariat analyze how much readability of management tags by each Member has improved since the following fishing season after the 28<sup>th</sup> EC, with the information accumulated through management tag survey. The outcome is expected to be reported at CC18 which will discuss whether or not to revise the specification of management tag and whether or not to continue to conduct this analysis.

Attachment;

- A) Timeframe
- B) Extract from the external expert's report

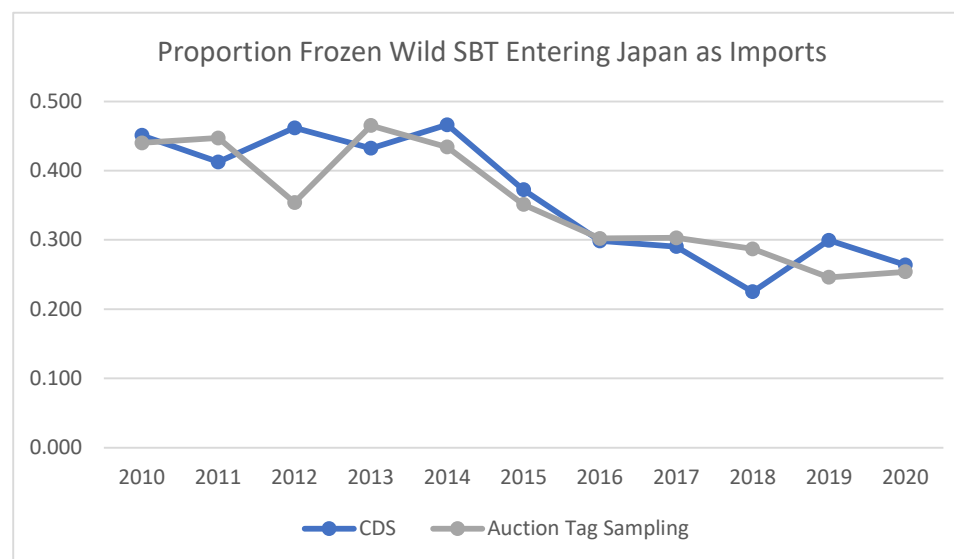
Timeframe for the proposed works

Proposed Works	2023		2024		2025	
	Inersessional Period	Annual Meeting	Inersessional Period	Annual Meeting	Inersessional Period	Annual Meeting
1.1 Annual verification with Catch Documentation Scheme (CDS) data and different data sets for improvement of monitoring of Southern Bluefin Tuna	( A), B), D) and E)	Specifications (e.g. formats) Outcome of analysis	( A), B), C), D), E), and F)	Outcome of analysis	( A), B), C), D), E), and F)	Outcome of analysis Continue...
1.2 Utilization of electronic data accumulated in eCDS (electronic CDS) for traceability - Development of new function/webpage -		Outcome of feasibility study, if possible Discuss whther to instruct Secretariat to develop specifications	Proposing the specification Endorse the proposed specifications		It will be installed after full installation of eCDS	
2. Review of issues related to the Market Formula, indicated by the external expert		Outcome of analysis				
3. Further enhancement in collection of data in relation to Non-Members' catch and trade of SBTs		Issue letters to ask Non-Members to attend next meeting and apply for OSCE based on report of trade	Issue letters to ask Non-Members to attend next meeting and apply for OSCE based on report of trade			Continue...
4. Review of necessity to improve specification of management tag		Outcome of analysis Discuss whther to improve specification of tag and continue the analysis				if necessary, Continue...

-  : to be conducted by the Secretariat, if necessary, in cooperation with Members
-  : to be discussed and/or decided by Members
-  : to be conducted by Japan

**Panel 1.** Data, graphic and interpretation for Correspondence #1 – Proportion of Imports in the Japan Market. CDS data extract provided by the Secretariat and calculated for this study from 2010 (first year of implementation of the CDS) through 2020 (most recent complete year). CDS data represent all frozen wild SBT which are recorded as exported (or re-exported) with export destination Japan expressed as a proportion of this quantity+domestic landings by Japan. For this analysis it is assumed that all frozen re-exports with export destination Japan are wild SBT. The auction data are from a summary provided by Japan (unpublished data) based on the most recent revision (July 2022; see Section 3.6.2).

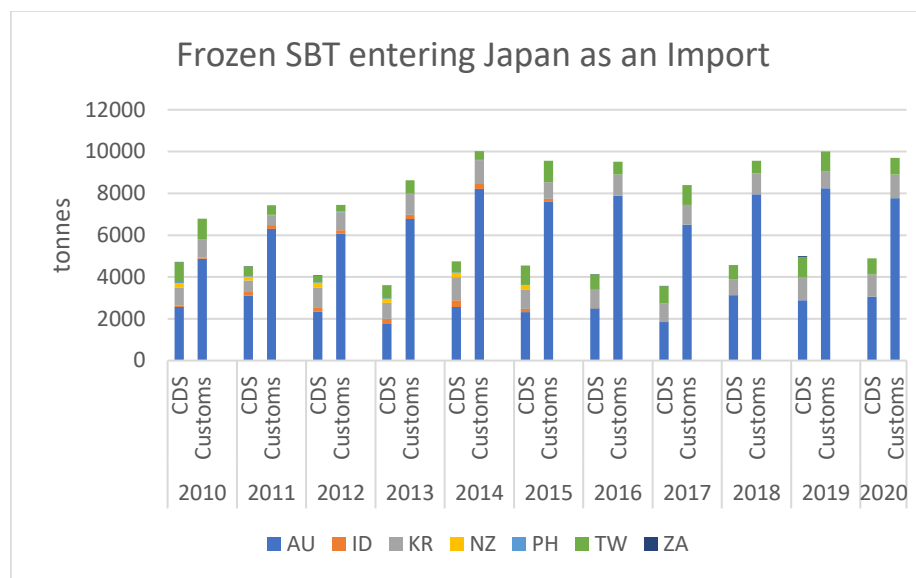
Proportion of Frozen Wild SBT entering Japan as Imports		
Year	CDS ((re)exports to JP/ ((re)exports to JP+domestic landings))	Auction Sampling (i)
2010	0.451	0.440
2011	0.413	0.447
2012	0.462	0.354
2013	0.432	0.465
2014	0.466	0.434
2015	0.372	0.351
2016	0.299	0.302
2017	0.290	0.303
2018	0.225	0.287
2019	0.300	0.246
2020	0.264	0.254



**Interpretation:** In the early years of the series both data sources indicate that the frozen wild SBT market in Japan was supplied fairly evenly (near 50%-50%) by domestic and foreign sources. However the foreign supply is currently only ~25%. The data from the two sources is quite consistent which suggests that if it is necessary to continue to monitor the proportion of imports, the CDS data could be used in lieu of auction sampling. The decline in the proportion of imports over time in combination with increasing quantities of SBT flowing to Japan in recent years (see Panel 5) is likely driven by an increase in the SBT catch by Japan (CCSBT 2021c). If the Japan market is inelastic (i.e. if demand does not expand as supply increases and instead Japan-caught SBT replaces imports) the declining proportion of imports may also signal growth in SBT markets outside of Japan. However, despite the declining proportion of imports, overall the quantity of imports appears relatively stable (see Panel 4).

**Panel 2.** Data, graphic and interpretation for Correspondence #2 – Quantity of Frozen SBT Imports. CDS data extract provided by the Secretariat and calculated for this study from 2010 (first year of implementation of the CDS) through 2020 (most recent complete year). CDS data represent frozen SBT (both wild and farmed) recorded as an export (or re-export) with destination Japan. Customs data were downloaded from Japan Ministry of Finance website (JMOF 2022) and do not separate wild and farmed SBT (0303.46-000). Data are reported in kilograms but are shown here in tonnes.

Quantity of Frozen SBT Entering Japan as an Import							
	AU	ID	KR	NZ	PH	TW	ZA
<b>2010</b>							
CDS	2,569	67	857	225	37	948	<1
JMOF	4,879	64	829	0	38	984	0
<b>2011</b>							
CDS	3,122	154	563	173	39	463	15
JMOF	6,303	175	457	0	39	459	0
<b>2012</b>							
CDS	2,340	184	966	208	40	316	20
JMOF	6,069	176	846	0	40	310	0
<b>2013</b>							
CDS	1,777	215	774	164	40	612	17
JMOF	6,769	211	1,000	0	39	612	0
<b>2014</b>							
CDS	2,568	316	1,098	196	39	508	3
JMOF	8,206	284	1,103	0	40	390	0
<b>2015</b>							
CDS	2,316	149	936	223	0	896	5
JMOF	7,621	117	800	0	0	1,022	-
<b>2016</b>							
CDS	2,505	4	884	<1	0	730	12
JMOF	7,885	0	1,012	0	0	622	0
<b>2017</b>							
CDS	1,849	<1	885	<1	0	824	18
JMOF	6,498	0	951	0	0	942	0
<b>2018</b>							
CDS	3,125	<1	776	0	0	650	12
JMOF	7,948	0	1,008	0	0	605	0
<b>2019</b>							
CDS	2,878	0	1,087	0	0	989	40
JMOF	8,249	0	788	0	0	964	0
<b>2020</b>							
CDS	3,047	0	1,081	0	0	768	0
JMOF	7,768	0	1,129	0	0	804	0

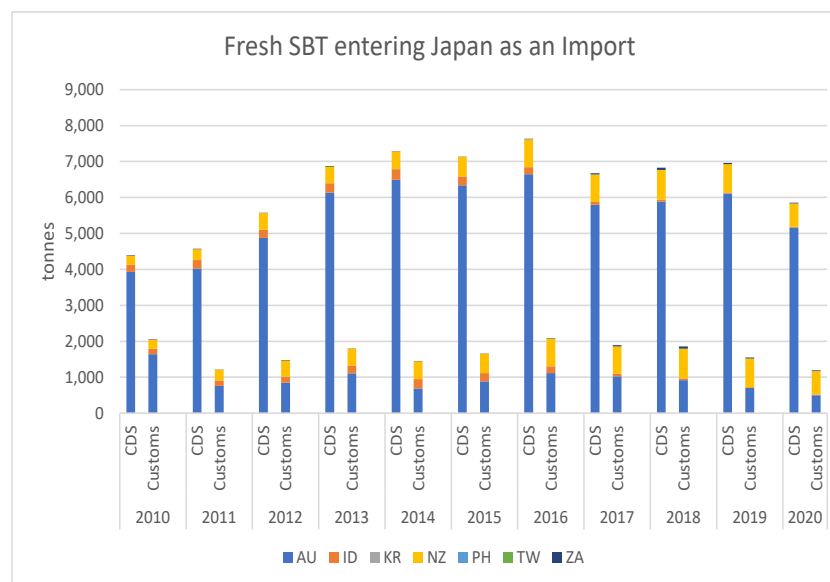


**Interpretation:** There are large discrepancies in the recorded quantities of frozen SBT (wild and farmed) entering Japan as imports according to the CDS and Japan customs statistics. These discrepancies appear to be mainly due to substantial amounts of Australian product being recorded as frozen under Japan customs statistics but not under the CDS. The Secretariat and Australia have investigated these discrepancies and it appears that substantial quantities of frozen SBT have been inadvertently reported as fresh on CDS forms. As there is no way of separating wild from farmed SBT in customs statistics, the CDS data for both wild and farmed SBT have been tallied for this comparison.



**Panel 3.** Data, graphic and interpretation for Correspondence #2 – Quantity of Fresh SBT Imports. CDS data extract provided by the Secretariat and calculated for this study from 2010 (first year of implementation of the CDS) through 2020 (most recent complete year). CDS data represent fresh SBT (both wild and farmed) recorded as an export (or re-export) with destination Japan. Customs data were downloaded from Japan Ministry of Finance website (JMOF 2022) and do not separate wild and farmed SBT (0302.36-000). Data are reported in kilograms but are shown here in tonnes.

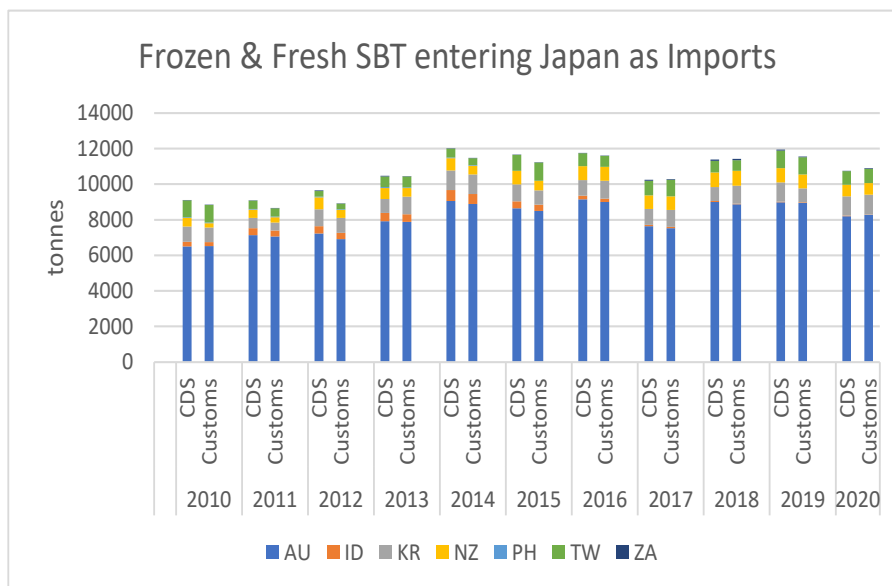
Quantity of Fresh SBT Entering Japan as an Import							
	AU	ID	KR	NZ	PH	TW	ZA
<b>2010</b>							
CDS	3,928	202	0	253	0	0	14
JMOF	1,638	155	0	249	0	0	11
<b>2011</b>							
CDS	4,018	242	0	301	0	0	11
JMOF	756	155	0	295	0	0	8
<b>2012</b>							
CDS	4,878	230	0	457	0	0	11
JMOF	848	170	0	449	0	0	9
<b>2013</b>							
CDS	6,136	256	<1	470	0	<1	5
JMOF	1,107	218	0	471	0	0	2
<b>2014</b>							
CDS	6,489	294	1	497	0	0	7
JMOF	685	264	0	496	0	0	1
<b>2015</b>							
CDS	6,336	246	3	542	0	0	10
JMOF	884	232	0	541	0	0	7
<b>2016</b>							
CDS	6,644	201	0	776	0	0	13
JMOF	1,113	189	0	774	0	0	12
<b>2017</b>							
CDS	5,798	75	0	763	0	0	36
JMOF	1,027	71	0	762	0	0	33
<b>2018</b>							
CDS	5,882	54	0	826	0	0	66
JMOF	917	50	0	825	0	0	62
<b>2019</b>							
CDS	6,108	26	<1	794	0	0	31
JMOF	703	22	0	794	0	0	32
<b>2020</b>							
CDS	5,159	24	0	654	0	0	20
JMOF	497	21	0	653	0	0	20



**Interpretation:** There are also major discrepancies in the recorded quantities of fresh SBT entering Japan as imports according to the CDS and Japan customs statistics. These discrepancies appear to be mainly due to large amounts of Australian product being recorded as fresh under the CDS but not under Japan customs statistics. The Secretariat and Australia have investigated these discrepancies and it appears that substantial quantities of frozen SBT have been inadvertently reported as fresh on CDS forms. As there is no way of separating wild from farmed SBT in customs statistics, the CDS data for both wild and farmed SBT have been tallied for this comparison.

**Panel 4.** Data, graphic and interpretation for Correspondence #2 – Quantity of Frozen+Fresh SBT Imports. CDS data extract provided by the Secretariat and calculated for this study from 2010 (first year of implementation of the CDS) through 2020 (most recent complete year). CDS data represent frozen and fresh SBT (both wild and farmed) recorded as an export (or re-export) with destination Japan. Customs data were downloaded from Japan Ministry of Finance website (JMOF 2022) and do not separate wild and farmed SBT (0302.36-000 and 0303.46-000). Data are reported in kilograms but are shown here in tonnes.

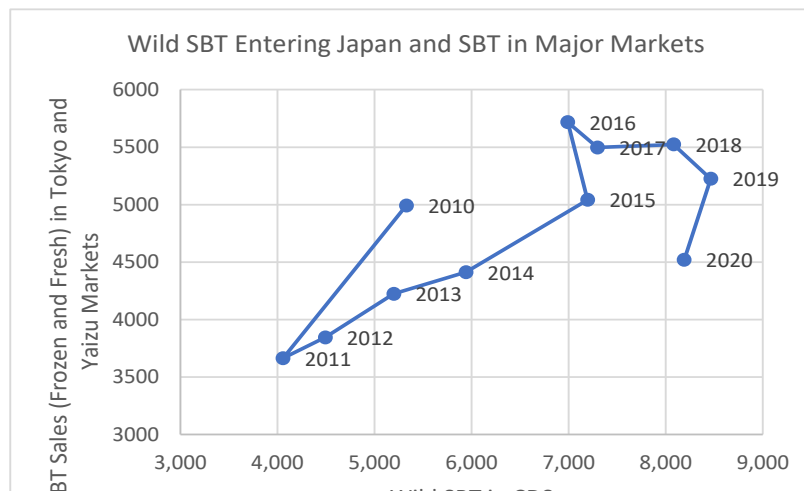
Quantity of Frozen + Fresh SBT Entering Japan as an Import							
	AU	ID	KR	NZ	PH	TW	ZA
<b>2010</b>							
CDS	6,496	269	857	478	37	948	14
JMOF	6,517	219	829	249	38	984	11
<b>2011</b>							
CDS	7,140	396	563	474	39	463	26
JMOF	7,059	330	457	295	39	459	8
<b>2012</b>							
CDS	7,218	414	966	665	40	316	31
JMOF	6,917	346	846	449	40	310	9
<b>2013</b>							
CDS	7,913	471	774	634	40	613	22
JMOF	7,876	429	1,000	471	39	612	2
<b>2014</b>							
CDS	9,057	610	1,099	693	39	508	10
JMOF	8,891	548	1,103	496	40	390	1
<b>2015</b>							
CDS	8,652	395	939	765	0	896	15
JMOF	8,505	349	800	541	0	1,022	7
<b>2016</b>							
CDS	9,149	205	884	776	0	730	25
JMOF	8,998	189	1,012	774	0	622	12
<b>2017</b>							
CDS	7,647	75	885	764	0	824	54
JMOF	7,525	71	951	762	0	942	33
<b>2018</b>							
CDS	9,007	54	776	826	0	650	78
JMOF	8,865	50	1,008	825	0	605	62
<b>2019</b>							
CDS	8,986	26	1,088	794	0	989	71
JMOF	8,952	22	788	794	0	964	32
<b>2020</b>							
CDS	8,206	24	1,081	654	0	768	20
JMOF	8,265	21	1,129	653	0	804	20



**Interpretation:** When fresh and frozen quantities are summed (without regard to whether wild or farmed) the discrepancy in quantity between CDS and customs datasets is small because the discrepancies between Australian frozen and fresh products offset each other (see Panels 2 and 3). The reduced quantities of imports from Indonesia beginning in 2015 correspond to a sharp decline in the percentage of catch reported by Indonesia to the CDS as exported (as low as 10-30% in recent years). This is one example of a potential catch verification issue that cannot be addressed using Japan market data.

**Panel 5.** Data, graphic and interpretation for Correspondence #3 – Wild SBT Entering Japan and SBT in Major Markets of Japan. CDS data extract provided by the Secretariat and calculated for this study from 2010 (first year of implementation of the CDS) through 2020 (most recent complete year). CDS data represent wild SBT regardless of form (fresh or frozen), recorded as an export (or re-export) with destination Japan plus Japan’s domestic landings. For this analysis it is assumed that all frozen re-exports with export destination Japan are wild SBT. Tokyo and Yaizu market data were extracted from TMG website (TMG 2022) and Yaizu Fisheries Cooperative Yearbooks (YFCA 2022), respectively, and include both frozen and fresh SBT. Data are reported in kilograms but are shown here in tonnes.

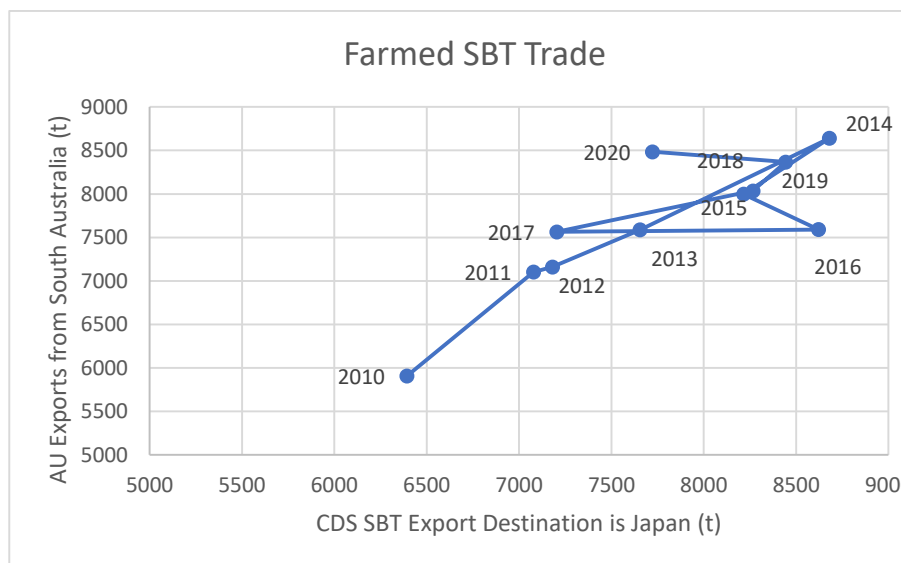
<b>CDS Wild SBT entering Japan vs Market Sales</b>			
<b>Year</b>	<b>(A) CDS (t)</b>	<b>(B) Market Sales in Tokyo &amp; Yaizu (t)</b>	<b>B/A (%)</b>
<b>2010</b>	5,328	4,993	0.94
<b>2011</b>	4,057	3,664	0.90
<b>2012</b>	4,492	3,845	0.86
<b>2013</b>	5,199	4,224	0.81
<b>2014</b>	5,942	4,413	0.74
<b>2015</b>	7,196	5,041	0.70
<b>2016</b>	6,991	5,716	0.82
<b>2017</b>	7,297	5,497	0.75
<b>2018</b>	8,082	5,523	0.68
<b>2019</b>	8,464	5,225	0.62
<b>2020</b>	8,191	4,521	0.55



**Interpretation:** In 2010 the amount of fresh and frozen wild SBT received in Japan according to the CDS and the amount of fresh and frozen wild SBT recorded in Tokyo and Yaizu markets were almost the same. This is perhaps because the CDS did not immediately capture all SBT. In 2011, the amount of SBT in both the CDS and the markets reduced considerably and then grew (aside from 2016) until 2018, with the amount in the market hovering between 70-90% of the amount recorded in the CDS in each of these years. In the most recent years (2018-2020) the CDS-reported quantities were higher than in previous years, perhaps reflecting larger SBT catches overall (CCSBT 2021c), but the amounts in the Tokyo and Yaizu market did not grow at the same rate thereby altering the trend. In 2020, both datasets showed a decline, but the market decline was sharper, possibly reflecting greater stockpiling due to the pandemic’s effect on demand for high grade seafood.

**Panel 6.** Data, graphic and interpretation for Correspondence #4 – Trade in Farmed SBT. CDS data extract provided by the Secretariat and calculated for this study from 2010 (first year of implementation of the CDS) through 2020 (most recent complete year). CDS data represent farmed SBT (frozen or fresh) which are exported with export destination Japan. For this analysis it is assumed that all frozen re-exports with export destination Japan are wild SBT (and thus these quantities are not included). Australian SBT export data for South Australia were compiled from the FRDC Seafood Production and Trade Databases (2022). Data are reported in kilograms but are shown here in tonnes.

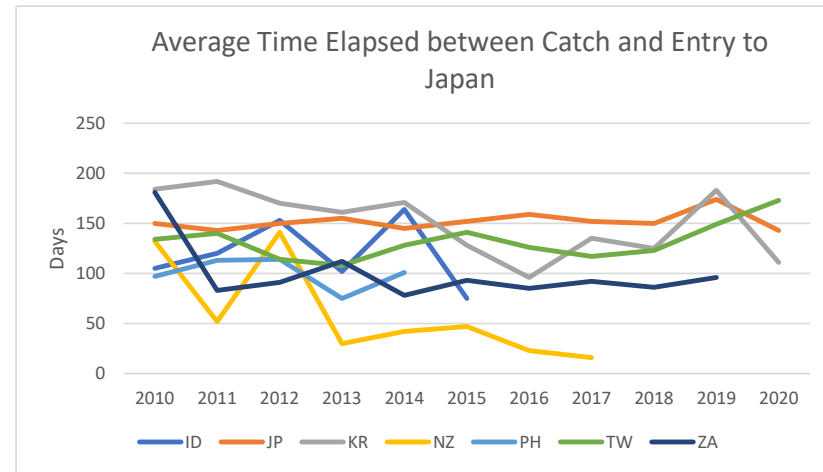
Trade in Farmed SBT		
Year	CDS (t)	AU exports from South Australia (t)
2010	6,392	5,906
2011	7,078	7,102
2012	7,181	7,160
2013	7,654	7,588
2014	8,680	8,639
2015	8,216	7,998
2016	8,622	7,591
2017	7,204	7,564
2018	8,266	8,035
2019	8,444	8,367
2020	7,723	8,484



**Interpretation:** The relationship is consistent, as expected, for most of the years in the series, with the Australian-reported quantities slightly lower in most years than the CDS. Deviations on the order of 500-1,000 t are observed in 2010, 2016 and 2020 which represent up to +/-14% and suggest there can be considerable error even in a straightforward comparison such as this. As for some of the other correspondences, a different relationship between the two datasets is observed in 2020 compared to other years. This could be a result of the pandemic, but in contrast to Panel 5 greater stockpiling once the farmed SBT reach Japan would not explain the observed effect.

**Panel 7.** Data, graphic and interpretation for Correspondence #5 – Interpretation of Market Time Lags. CDS data extract provided by the Secretariat and calculated for this study from 2010 (first year of implementation of the CDS) through 2020 (most recent complete year). CDS data for countries other than Japan represent frozen wild SBT that are exported with export destination Japan (re-exports are excluded by design). CDS data for Japan were derived from records with flag State Japan and which are not exported (i.e. domestic landings). Average time elapsed is calculated as the number of days between harvest date and reporting date (effectively date of export), with records having elapsed times of zero or less removed.

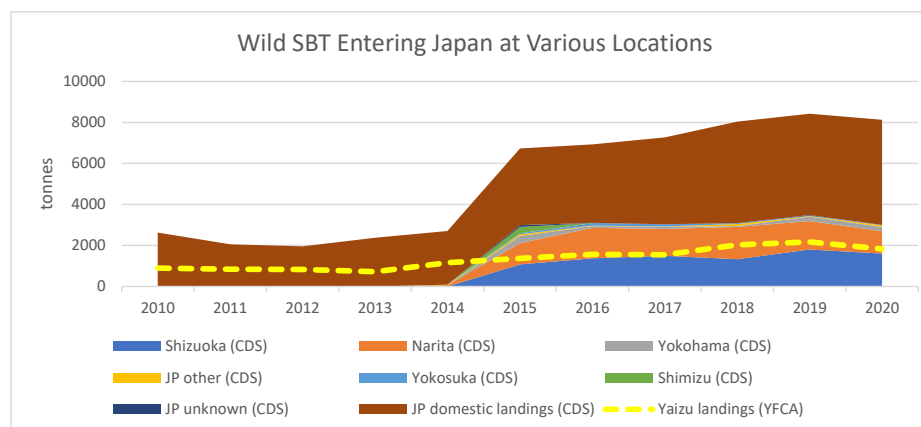
Average Time Elapsed between Catch and Entry to Japan							
	ID	JP	KR	NZ	PH	TW	ZA
<b>2010</b>	105	150	184	132	97	134	181
<b>2011</b>	120	143	192	52	113	140	83
<b>2012</b>	153	150	170	141	114	114	91
<b>2013</b>	102	155	161	30	75	108	112
<b>2014</b>	164	145	171	42	101	128	78
<b>2015</b>	75	152	128	47	-	141	93
<b>2016</b>	-	159	96	23	-	126	85
<b>2017</b>	-	152	135	16	-	117	92
<b>2018</b>	-	150	125	-	-	123	86
<b>2019</b>	-	174	183	-	-	149	96
<b>2020</b>	-	143	111	-	-	173	-
<b>Average of all records</b>	<i>126</i>	<i>151</i>	<i>149</i>	<i>71</i>	<i>101</i>	<i>136</i>	<i>93</i>



**Interpretation:** The CDS data for frozen wild SBT entering Japan show elapsed time in days between catch and reporting date (effectively export date) for seven flag States. The average elapsed time varies by fleet and year but without any clear time trend (with the exception of New Zealand). The overall averages for the three Members’ whose catches most often appear in Japan frozen market auctions (JP, KR and TW) are remarkably similar (151, 149 and 136 days, respectively). These average lags cannot be directly compared to Japan’s tag reading data because those lags represent the time between catch and market sale (i.e. they would include stockpiling time, if any) and are reported in years (0, -1, -2 etc.) rather than days. However, the assumption used thus far in the market formula that lags do not vary by fleet is not refuted by this analysis.

**Panel 8.** Data, graphic and interpretation for Correspondence #6 – Wild SBT entering Japan by Location. CDS data extract provided by the Secretariat and calculated for this study from 2010 (first year of implementation of the CDS) through 2020 (most recent complete year). CDS data for countries other than Japan represent wild SBT that are exported with export (or re-export) destination (i.e. import country) Japan. CDS data for Japan were derived from records with flag State Japan and which are not exported (i.e. domestic landings). Yaizu landings data extracted from Yaizu Fisheries Cooperative Yearbooks (YFCA 2022). Data are reported in kilograms but shown here in tonnes.

SBT Entering Japan by Location					
	Wild SBT entering Japan (CDS):				Landing
	Shizuoka	Narita	Other JP locations	JP domestic landings	Yaizu Landings
<b>2010</b>	0	3	2	2,624	892
<b>2011</b>	0	20	0	2,034	839
<b>2012</b>	0	0	0	1,962	828
<b>2013</b>	0	0	1	2,378	716
<b>2014</b>	1	62	27	2,619	1,156
<b>2015</b>	1077	1035	879	3,738	1,368
<b>2016</b>	1381	1481	246	3,823	1,563
<b>2017</b>	1496	1304	238	4,229	1,546
<b>2018</b>	1334	1570	190	4,945	2,028
<b>2019</b>	1803	1382	303	4,936	2,169
<b>2020</b>	1602	1090	305	5,126	1,831



**Interpretation:** More than half the wild SBT entering Japan in recent years derives from domestic landings which under the CDS are not required to record the location of landing. Considering wild exports (and re-exports) to Japan, approximately half are delivered to Shizuoka and half to Narita (less to Narita in 2019-2020), with small quantities recorded as entering at Yokohama, Yokosuka, Shimizu and other named and unnamed locations. Quantities of wild SBT recorded by the Yaizu Fisheries Cooperative Association as landed in Yaizu are similar each year to the amount of imports recorded as entering “Shizuoka”, but the latter are expected to include both Yaizu and Shimizu (because quantities recorded as Shimizu have dropped to near zero in recent years) and possibly Ooigawa. For the CDS data to be useful in checking landings data several features of the datasets would need to be improved: a) SBT landings data for Japan ports other than Yaizu would need to be made available; b) the location of domestic landings should be required under the CDS; and c) recording of exports under the CDS should be specified by port or city (not merely by prefecture).