



CCSBT-CC/2310/12

Potential Future Options for CCSBT's Quality Assurance Review (QAR) Programme

1. Introduction

The Seventeenth meeting of the Compliance Committee (CC17) agreed a Workplan item for: *“Members to provide comments and suggestions on QAR options to the Secretariat for consideration at CC 18. The Secretariat will collate comments on options for a paper to CC 18.”*

This paper re-provides the list of four potential future QAR options (**Attachment A**) presented by New Zealand to CC17¹ for Members to reconsider, as well as an additional fifth option proposed by the 6th meeting of the Strategy & Fisheries Management Working Group (SFMWG 6) in its draft Ongoing Workplan. Members will be asked to provide comments and suggestions on the five options presented.

2. Background

The purpose of CCSBT's Quality Assurance Reviews (QARs) is to provide independent reviews to help Members identify how well their management systems function with respect to their CCSBT obligations and to provide recommendations on areas where improvement is needed. It is further intended that QARs:

- Benefit the reviewed Member by giving them confidence in the integrity and robustness of their own monitoring and reporting systems;
- Promote confidence among all Members as to the quality of individual Members' performance reporting; and
- Further demonstrate the credibility and international reputation of the CCSBT as a responsible Regional Fisheries Management Organisation (RFMO).

The Extended Commission (EC) may consider the outcomes of QARs for fisheries management decision making.

QARs conducted to date focused on specific areas² and have been completed for all current CCSBT Members. Work began initially with trial QARs being undertaken in 2013 for Australia, Japan, Korea and New Zealand³, and ended with the completion of the QAR of the European Union (EU) between 2020 and 2021.

Value of QAR Programme to Date

The value of CCSBT's QAR programme has been recognised internally by Members as well as externally, including as noted in CC17's report:

¹ [Paper CCSBT-CC/2210/20](#)

² National allocations, the Catch Documentation Scheme (CDS) Resolution, the Record of authorised Carrier Vessels, the Transshipment at-sea monitoring programme and annual reporting to the Compliance Committee

³ Full QARs were completed for these Members in subsequent years

Extracts from CC17 Report:

87. Taiwan noted its support for the QAR process recognising the uniqueness of QARs to CCSBT and the credibility that they provide the CCSBT.

88. The Chair endorsed the comments from Taiwan noting his own experiences in other RFMOs and their praise of the CCSBT's use of independent review.

Recommendations to EC:

144. The Compliance Committee (CC) made the following recommendations to the Extended Commission (EC).

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8. The future of QARs was discussed. The meeting agreed that the QAR process has been very beneficial as a compliance tool for the CCSBT and recommends that the EC and SFMWG take the value of QARs into consideration when developing the Performance Review Implementation Plan.

3. Additional Considerations Regarding Potential Future QARs

Consideration of QARs by SFMWG 6

Earlier this year, the 6th meeting of the Strategy & Fisheries Management Working Group (SFMWG 6)⁴ included the following QAR item (no. 7) within its draft Ongoing Workplan:

Item Number	Description	Goals and Objectives Area	Priority
7	Apply the Quality Assurance Review (QAR) Program to countries and/or entities who join the Commission in the future. Ongoing QAR program for existing Members is subject to the decision by the EC based on further advice from the Compliance Committee.	Goals concerning participation and implementation by Members	High

Inclusion of Targeted QARs as a Proposed Corrective Action

The Secretariat's CC18 paper on the review of the Corrective Actions Policy (CCSBT–CC/2310/10) proposes that targeted QARs could be conducted as a corrective action in cases where there is persistent non-compliance with respect to CCSBT's CDS, Port Inspection or Transshipment Resolutions, with the QAR to be funded by the non-compliant Member.

4. QAR Programme Options Proposed by New Zealand in 2022

The QAR programme options proposed by New Zealand in 2022¹, including New Zealand's preliminary assessment of the advantages and disadvantages of each option, are provided below and in **Attachment A** for Members' reference.

A summary of the four options provided in 2022 by New Zealand is as follows:

1. Discontinue use of QAR audits.
This option is not consistent with the draft Ongoing Workplan proposed by SFMWG6 nor with the proposed revisions to CCSBT's Corrective Actions Policy (CPG3).
2. Members conduct independent assessments of the original recommendations from their individual QAR reports.
3. Additional QARs are conducted for targeted Conservation and Management Measures (CMMs).
This option is consistent with the proposed revisions to the Corrective Actions Policy (CPG3) to include targeted QARs as a required corrective action under specific circumstances. An important point proposed in CPG3 that is not included in New

⁴ Convened in Tokyo, Japan between 25 to 28 July 2023

Zealand's preliminary discussion, is that a corrective action QAR would be funded by the non-compliant Member rather than the Commission.

4. Repeat full QAR process.

Based on SFMWG6's draft Ongoing Workplan, a fifth option can be added to New Zealand's list which is to:

5. Apply the Quality Assurance Review (QAR) Program to countries and/or entities who join the Commission in the future.

5. Action Required

The Compliance Committee is requested to consider:

- The five future QAR options outlined in section 4 above, taking into consideration that SFMWG 6 included a draft Ongoing Workplan item to, "apply the Quality Assurance Review (QAR) Programme to countries and/or entities who join the Commission in the future" within the draft CCSBT Strategic Plan; and
- The comments and suggestions on these five options provided by Members.

The Compliance Committee is invited to:

- Recommend a preferred option on how to proceed with CCSBT's QAR Programme in the future.

Prepared by the Secretariat

Excerpt from New Zealand's Paper "Options for the Future of CCSBT QAR Programme" (CCSBT-CC/2210/20) Presented to CC17

Table 1. Summary table of options for the future of the QAR work programme.

Option	Advantages	Disadvantages	Estimated Cost
1. Discontinue QARs	<ul style="list-style-type: none"> • Allows Members to focus on identified shortcomings in their own time and means • Resources could be refocussed on other CCSBT priorities, e.g. capacity support/development • No cost to the CCSBT 	<ul style="list-style-type: none"> • Limited additional mechanisms in place to measure/track Member's compliance with measures • QAR process unique to CCSBT and seen as a boon to the Commission 	No cost to CCSBT
2. Members conduct independent assessments of original QAR recommendations	<ul style="list-style-type: none"> • No/low cost compared to conducting full QARs (if Members conduct assessments) • Allows for in-depth follow up and accountability on Member's QAR reports 	<ul style="list-style-type: none"> • Only reviews identified shortcomings, no review of compliance with all minimum requirements • Puts onus, cost on Members to resolve shortcomings and draft response report. 	No or low cost to CCSBT
3. Complete QARs for targeted/key CMMs	<ul style="list-style-type: none"> • Reduced cost compared to option 4 • Allows for a more detailed assessment of compliance with key CMMs of interest to Members 	<ul style="list-style-type: none"> • Requires risk assessing of (and agreement on) which obligations/CMMs to assess • Could allow for some CMMs to 'fall through the cracks' 	\$50,000
4. Repeat full QAR process	<ul style="list-style-type: none"> • Allows for complete re-analysis of all CMMs, including those where shortcomings were previously identified 	<ul style="list-style-type: none"> • High cost to CCSBT and Members 	\$130,000

Discussion of options

Option 1 – Discontinue QARs

Advantages

Discontinuing the QAR process for CCSBT would result in significant cost savings for the Commission which could be applied elsewhere to other priority projects (e.g. capacity support/development). The current budget projections constructed by the Secretariat anticipate budgetary shortfalls in the near future and has proposed an increase to Member contributions to help address these shortfalls. A project like the QAR programme is associated with significant costs which may result in additional increases to Member contributions to CCSBT.

Additionally, removing the burden of an obligation to the CCSBT QAR programme will allow Members to address the deficiencies identified in their QAR reports in their own time and through their own means. This will alleviate some of the burden on Members in terms of financing and capacity, resources which could also be re-directed to other priority projects identified by CCSBT.

Disadvantages

The QAR programme is unique to CCSBT and has been lauded by external organizations and other entities. This unique aspect of CCSBT sets it apart from other RFMOs and raises the standards for accountability and transparency, setting a high bar for other RFMOs. Abandoning this unique management mechanism could reflect negatively on CCSBT in the various international forums in which it operates.

The mechanisms of the QAR programme to assess Members' compliance with CCSBT management measures were constructed to address identified deficiencies in compliance with these management measures. There is a risk that discontinuing the QAR work programme will allow these shortcomings to once again manifest as there are limited additional mechanisms in place to track Member's compliance with measures.

Option 2 – Members conduct independent assessment of original QAR recommendations

Advantages

Member-led independent assessments of the outcomes of the original QARs would allow for in-depth follow up on deficiencies identified in the reports. It would allow Members to address these shortcomings and create accountability to report back to CCSBT on how they are being addressed. It would also demonstrate a commitment by CCSBT to give due consideration to the deficiencies identified in the QARs. An alternative to drafting a separate report could be a designated section or annex under the existing Compliance Committee report template where Members can systematically report back on progress gained in addressing deficiencies identified in their QAR reports.

Similar to the financial considerations under *Option 1*, this option provides a reprieve to the CCSBT budget because funding responsibility for the work falls primarily on Member nations. However, given CCSBT prioritisation of capacity building in developing Member nations, a small budget could be made available to assist Members in addressing the recommendations of their QAR reports if needed and agreed to by the EC.

Disadvantages

This option limits the review of Member's compliance with measures only to those that were identified as not meeting the standard of the CCSBT Minimum Performance Requirements. While this limited review allows for more focused response, it also limits the examination of compliance with measures which could allow for additional deficiencies to go unnoticed or unaddressed, especially given the amount of time that has elapsed since many Member's QAR reports were finalised.

The cost in terms of resources and time for drafting the response report falls on individual Members which may be problematic for some. The recommendations from the QAR reports varied widely between Members in terms of their complexities and potential effort required to resolve the identified deficiencies which could place a burden on some Members to address.

Option 3 – Complete QARs for targeted/key CMMs

Advantages

Targeting specific CMMs that have been selected by CCSBT Members allows for in-depth review of those measures deemed most critical. It also provides an opportunity to address those measures with low adherence historically.

Additionally, the cost for this option would be relatively modest when compared to the cost to repeat the full QAR process. Based on the cost of the trial QAR process, the estimated cost would be approximately \$50,000, approximately two-thirds the cost for a full QAR programme.

Disadvantages

The selection of the CMMs that would be examined for this process would require agreement by all CCSBT Members. This would necessitate a risk assessment or review process to make the decisions around the selection of CMMs. Unless there is a common view on priorities, this could be a lengthy process requiring additional time and resourcing.

The selection of target CMMs would, by its nature, exclude some CMMs from the review process. This would deprioritize some of the CMMs implemented into the CCSBT Minimum Performance Requirements policy, a policy previously confirmed by Member nations. Similar to the previous option, this could allow for some deficiencies in adherence to CMMs to go unnoticed or unaddressed.

Option 4 – Repeat full QAR process

Advantages

Repeating the full QAR process would allow for an in-depth review against the standard of the CCSBT Minimum Performance Requirements policy. The review would include (and could take into consideration) the deficiencies identified in the last QAR process. Repeating this process would remove the risk that deficiencies in adherence to some CMMs would go unnoticed or unaddressed.

Disadvantages

There is a high cost associated with this option, both to the CCSBT budget and also to individual Members who would be required to provide time and resourcing towards the project. The estimated cost to CCSBT based on the original QAR budget (including the additional funds the Secretariat was authorised to allocate to the project) was approximately \$130,000. Given the current projected budget shortfalls (see description under *Option 1*) CCSBT Members will likely be required to re-examine current prioritisation in the budget, as well as increase their Member contribution to cover the cost.

Conclusion

The options identified above are intended to generate discussion among Members but are not meant to be comprehensive. There may be alternatives that members wish to raise but ultimately the objective of the CC discussion is to recommend a course of action to the EC on the future of the QAR Programme at CCSBT.