



CCSBT-CC/2310/12

## Potential Future Options for CCSBT's Quality Assurance Review (QAR) Programme CCSBT 品質保証レビュー (QAR) プログラムの将来的なオプション案

### 1. Introduction

#### 序論

The Seventeenth meeting of the Compliance Committee (CC17) agreed a Workplan item for: 第17回遵守委員会会合 (CC 17) は以下に関する作業計画事項に合意した。

*“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.”*

「CC 18 による検討に向けて、メンバーは事務局に対し、QAR のオプションに関するコメント及び提案を提出する。事務局は、CC 18 に対する文書としてこれらのオプションに関するコメントを取りまとめる。」

This paper re-provides the list of four potential future QAR options (**Attachment A**) presented by New Zealand to CC17<sup>1</sup> for Members to reconsider, as well as an additional fifth option proposed by the 6<sup>th</sup> 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.

本文書では、ニュージーランドが CC 17 に提出した四つの将来的な QAR のオプション案のリスト (別紙 A) をメンバーによる再検討のために改めて提示するとともに、第6回戦略・漁業管理作業部会会合 (SFMWG 6) により継続的作業計画案の中で提案された第五のオプションを提示する。メンバーは、これら五つのオプションに対するコメント及び提案を行うことが要請されている。

### 2. Background

#### 背景

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:

CCSBT 品質保証レビュー (QAR) の目的は、CCSBT の義務に対するメンバーの管理システムがどの程度適切かをメンバー自身が確認するための独立レビューを提供するとともに、改善が必要な分野に関する勧告を提供することである。さらに QAR には以下の意図がある。

- Benefit the reviewed Member by giving them confidence in the integrity and robustness of their own monitoring and reporting systems;  
レビューを受けたメンバーのモニタリング及び報告システムの完全性及び頑健性に関する信頼性を高めること

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<sup>1</sup> [文書 CCSBT-CC/2210/20](#)

- Promote confidence among all Members as to the quality of individual Members' performance reporting; and  
各メンバーの履行報告の品質にかかる全てのメンバー間の信頼を促進すること
- Further demonstrate the credibility and international reputation of the CCSBT as a responsible Regional Fisheries Management Organisation (RFMO).  
責任ある地域漁業管理機関（RFMO）としての CCSBT の信頼性及び国際的な評価を実例をもって示すこと

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

拡大委員会（EC）は、漁業管理に関する意思決定に当たり QAR の成果を考慮する可能性がある。

QARs conducted to date focused on specific areas<sup>2</sup> 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 Zealand<sup>3</sup>, and ended with the completion of the QAR of the European Union (EU) between 2020 and 2021.

これまでの QAR は特定の分野に重点を置き、現行の CCSBT メンバーの全てに対して実施された。最初の試行的 QAR はオーストラリア、日本、韓国及びニュージーランドを対象に 2013 年に実施され、2020 年から 2021 年の間に実施された欧州連合（EU）に対する QAR を以て完了した。

### ***Value of QAR Programme to Date***

#### ***今日までの QAR プログラムの価値***

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

CCSBT における QAR プログラムの価値は、CC 17 報告書でも述べられたとおり、メンバーによって内部的に、また外部的にも認識されてきたところである。

#### ***Extracts from CC17 Report:***

##### ***CC 17 報告書抜粋***

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

台湾は、CCSBT における QAR の独自性と、これが CCSBT に提供する信頼性について認識しつつ、QAR プロセスに関する同メンバーの支持を述べた。

*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.*

議長は、他の RFMO における議長自身の経験及び CCSBT が独立レビューを導入していることへの他 RFMO での称賛について述べつつ、台湾のコメントを支持した。

#### ***Recommendations to EC:***

##### ***EC に対する勧告：***

*144. The Compliance Committee (CC) made the following recommendations to the*

<sup>2</sup> 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  
国別配分量、漁獲証明制度（CDS）決議、許可運搬船記録、洋上転載監視プログラム、及び遵守委員会に対する国別報告書

<sup>3</sup> Full QARs were completed for these Members in subsequent years これらのメンバーに対する全面的な QAR は後年に完了した。

Extended Commission (EC).

遵守委員会 (CC) は、拡大委員会 (EC) に対して以下を勧告した。

.....  
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.

QAR の将来について検討された。会合は、QAR プロセスは CCSBT の遵守ツールとして非常に有益であったことに合意し、EC 及び SFMWG に対し、パフォーマンス・レビュー実施計画の策定に当たっては QAR の価値を考慮に入れるよう勧告した。

### 3. Additional Considerations Regarding Potential Future QARs

将来的な QAR に関する追加的な検討

#### Consideration of QARs by SFMWG 6

##### SFMWG 6 による QAR にかかる検討

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

先に開催された第 6 回戦略・漁業管理作業部会会合 (SFMWG 6) は、継続事項に関する作業計画案の中に以下の QAR 関連事項 (事項 7) を含めた。

Item Number 事項番号	Description 説明	Goals and Objectives Area ゴール及び目標分野	Priority 優先度
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. 将来的に委員会に加盟した国及び／又は主体に対して、品質保証レビュー (QAR) プログラムを適用する。既存のメンバーに対する継続的な QAR プログラムについては、遵守委員会からのさらなる助言に基づく EC による決定に拠る。	Goals concerning participation and implementation by Members メンバーによる参加及び実施に関するゴール	High 高

#### Inclusion of Targeted QARs as a Proposed Corrective Action

##### 是正措置に関する提案としての対象を絞った QAR の取り入れ

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.

是正措置政策のレビューに関する事務局文書 (CCSBT-CC/2310/10) では、CCSBT の CDS、港内検査又は転載決議に関して継続的な非遵守がある場合の是正措置として対象を絞った QAR を実施する (QAR にかかる費用は非遵守メンバーが拠出する) ことが考えられると提案している。

### 4. QAR Programme Options Proposed by New Zealand in 2022

#### 2022 年にニュージーランドが提案した QAR プログラムのオプション

The QAR programme options proposed by New Zealand in 2022<sup>1</sup>, including New Zealand's preliminary assessment of the advantages and disadvantages of each option, are provided

<sup>4</sup> Convened in Tokyo, Japan between 25 to 28 July 2023 2023 年 25 日から 28 日にかけて東京 (日本) で開催された。

below and in **Attachment A** for Members' reference.

メンバーが参照しやすいよう、2022年にニュージーランドが提案した QAR プログラムのオプション（各オプションの長所及び短所にかかるニュージーランドの予備的評価を含む）を別紙 **A** に示した。

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

ニュージーランドが 2022 年に提出した四つのオプションの概要は以下のとおりである。

1. Discontinue use of QAR audits.

QAR 監査の利用停止

*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).*

このオプションは、*SFMWG 6* による継続事項に関する作業計画案、又は *CCSBT 是正措置政策 (CPG 3) 改正案* のいずれとも 合致していない。

2. Members conduct independent assessments of the original recommendations from their individual QAR reports.

メンバーが、個別の QAR 報告書による当初の勧告にかかる独立評価を実施する。

3. Additional QARs are conducted for targeted Conservation and Management Measures (CMMs).

対象を絞った保存管理措置（CMM）に関する追加的な QAR を実施する。

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

このオプションは、特定の状況下における必要な是正措置として対象を絞った QAR を含めるとした是正措置政策（CPG 3）改正案と合致している。CPG 3 改正案のうちニュージーランドによる予備的検討には含まれていなかった重要な点は、是正措置としての QAR にかかる費用は委員会ではなく非遵守メンバーにより拠出されることである。

4. Repeat full QAR process.

全面的な QAR プロセスを再度実施する。

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

SFMWG 6 の継続事項に関する作業計画案に基づき、五つ目のオプションとしてニュージーランドによるリストに以下を追加することができる。

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

将来的に委員会に加盟した国及び／又は主体に対し、品質保証レビュー（QAR）プログラムを適用する。

## 5. Action Required

### 必要な行動

The Compliance Committee is requested to consider:

遵守委員会は以下について検討するよう要請されている。

- 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

SFMWG 6 が CCSBT 戦略計画案のうち継続事項に関する作業計画案に「将来的に委員会に加盟した国及び／又は主体に対し、品質保証レビューを適用する」との事項を含めたことを踏まえ、上記セクション 4 に総括した五つの将来的な QAR のオプションを検討すること。

- The comments and suggestions on these five options provided by Members.  
これら五つのオプションに対するメンバーからのコメント及び提案。

The Compliance Committee is invited to:

遵守委員会は以下を招請されている。

- Recommend a preferred option on how to proceed with CCSBT's QAR Programme in the future.  
将来における CCSBT の QAR プログラムの進め方について望ましいオプションを勧告すること。

**Prepared by the Secretariat**

事務局作成文書

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