



CCSBT-CC/2310/08 (Rev.1)

Operation of CCSBT MCS Measures

1. INTRODUCTION

This document provides a summary of the operation of some of CCSBT's main Monitoring, Control and Surveillance (MCS) measures, which have either not been discussed in other papers, or for which additional supplementary information is available. It also includes a note concerning use (nil) of CCSBT's "*Guideline on principles for action and steps to be taken in relation to extraordinary circumstances*" (Compliance Policy Guideline 5 – CPG5).

The measures and guideline discussed here are:

- The Catch Documentation Scheme (CDS),
- The Transshipment Monitoring Program,
- Guideline on principles for action and steps to be taken in relation to extraordinary circumstances (CPG5),
- Records of Authorised Vessels and Farms,
- The Vessel Monitoring System (VMS),
- CCSBT IUU Vessel List, and
- Minimum Standards for Inspections in Port.

2. CATCH DOCUMENTATION SCHEME (CDS)

CDS compliance issues have already been summarised in the Secretariat's Compliance with Measures report¹, and are generally not discussed in further detail here. This section of the report only includes information on Non-Cooperating Non-Members (NCNMs) that are voluntarily cooperating with the CDS.

Cooperation with NCNMs: USA

The USA is not a Member of the CCSBT but continues to cooperate voluntarily with the CDS with submissions being received quarterly. The Secretariat received its first import submission from the USA in late April 2016 (for the 2015 year). During 2017, the USA transitioned to a fully electronic trade data system and so expects that its trade reporting will have improved from 2018 onwards. As summarised in 2022², the USA's voluntary cooperation with the CDS is becoming more important as there are an increasing number of export Catch Monitoring Forms (CMFs) and Re-export/ Export after Landing Forms (REEFs) exported to the USA.

¹ Paper CCSBT-CC/2310/04

² Paper [CCSBT-CC/2210/14](#)

3. TRANSHIPMENT MONITORING PROGRAM

The CCSBT has a transshipment monitoring program for monitoring the at-sea and in-port transshipment of SBT by its Members. The program requires the CCSBT Secretariat to maintain an up-to-date Record of Authorised Carrier Vessels (CVs), as well as manage the supporting documentation such as deployment requests, transshipment declarations and observer reports.

Operational Issues

Unobserved Transshipments (2022): None

No unobserved at-sea transshipments were reported during 2022.

Indonesia not Meeting CCSBT's Transshipment Resolution Obligations

Indonesia is transshipping SBT at sea under an IOTC-agreed pilot project for monitoring transshipments at sea undertaken within IOTC's area of competency³ and this continued during 2022 (and 2023). This arrangement is not compliant with CCSBT's Transshipment Resolution.

Altogether, based on the combination of transshipment declarations and transshipment observer reports received to date, Indonesia conducted a total of 226 at-sea transshipments of SBT during 2022.

None of Indonesia's at-sea transshipments involving SBT conducted during 2022 met the requirements of the CCSBT's Transshipment Resolution for a variety of reasons including the following:

- None of the Indonesia Carrier Vessels receiving at-sea transshipments of SBT had on board a CCSBT observer in accordance with the CCSBT Regional Observer Program in Annex II of the CCSBT Transshipment Resolution.
- No deployment requests or other required notifications were provided to the CCSBT in advance of the transshipments occurring.
- Transshipment declarations are required to be submitted to the Secretariat within 24 hours of the completion of the transshipment. None were submitted within the required timeframe. Indonesia submitted 204 transshipment declarations for 2022 retrospectively to the Secretariat in bulk on 13/04/2023.
- By 31/08/23, Indonesia had not submitted any of its 2022 transshipment observer reports to the Secretariat. These are required to be provided within 20 days from the end of the period of observation.
- No transshipment information was initially provided on Indonesia's CMFs submitted to the Secretariat for the January to May 2022 period. Revised CMFs including most of the required transshipment information were later submitted to the Secretariat upon request on 04/11/2022. The Secretariat notes that all CMFs that were submitted with transshipment information were incomplete as they did not record the statistical area within which the High Seas transshipment occurred. The Secretariat has been able to infer this information from Transshipment Declarations when these are available.

³ Refer to paragraphs 25 and 26 of [IOTC's Resolution 23/05 on Establishing a Programme for Transshipment by Large-Scale Fishing Vessels](#)

Additional Information:

- Given no 2022 transshipment observer reports had been submitted by Indonesia by 31/08/2023, the Secretariat was compelled to request Indonesia's transshipment observer reports from the IOTC Secretariat on 01/09/2023 under the terms of the Transshipment Letter of Agreement (LoA) between CCSBT and IOTC. Ten Indonesian transshipment observer reports were subsequently received from the IOTC Secretariat on 07/09/2023.
- Upon processing, the Secretariat determined that the SBT transshipments recorded in the 10 transshipment observer reports received from the IOTC Secretariat matched only a portion (18.6%) of the SBT transshipments recorded on the 204 transshipment declarations submitted by Indonesia. The transshipment observer reports also included 17 SBT transshipments for which no matching transshipment declarations could be found.
- Subsequently, Indonesia made a very late submission (on 26/09/2023) of 20 transshipment observer reports to the CCSBT Secretariat. This submission included the same 10 transshipment observer reports that the CCSBT Secretariat had just received through the Transshipment LoA with IOTC, as well as an additional 10 transshipment observer reports that the IOTC Secretariat did not have on record. The Secretariat compiled this late information onto its database for reporting (refer to tables 1 and 3 of **Attachment A**). The additional 10 transshipment observer reports included a further 5 SBT transshipments for which no matching transshipment declarations could be found.

General Issues

In cases where transshipment observers were successfully deployed, the Secretariat observed the same main issues with operation of the Transshipment Resolution as in previous years which are difficulties with regard to:

- identifying SBT during multi-species transshipments, and
- ascertaining the species of tuna (specifically SBT) based solely on transshipment observer photographs. While it is essential to have observer photographs on record, it appears almost impossible to identify the species of tuna (especially when frozen, gilled and gutted) with any certainty based on photographs alone.

To address these operational issues, it continues to be recommended that:

- SBT should be transhipped separate to other tuna-like species, in order to assist observers with identification, and
- Members and the Secretariat should monitor developments in the effectiveness and availability of practical on-site genetic testing kits (for tuna species identification) so that any such tools developed can be considered for use by transshipment observers in the future.

Authorised Carrier Vessels: IMO Number Requirement

IMO numbers have been provided for all Carrier Vessels CCSBT-authorized between 1 July 2022 and 30 June 2023.

Summary of Transshipment Data Received

A summary of transshipment declarations and/or observer reports/CDS forms received for all transshipping Members for 2022, and for Japan, Korea and Taiwan only (not Indonesia) for the first half of 2023 (aggregated by flag and product type) is provided at **Attachment A** (Tables 1 - 5).

Tables 1, 2 and 3 of **Attachment A** provide information from *at-sea* transshipment declarations and observer reports received. In Table 1 of **Attachment A** there sometimes appear to be significant discrepancies between transshipment declaration weights of SBT versus observer reported weights. The reason for these discrepancies is because many observer reports have often not included the weight of SBT transhipped for each individual vessel, but only the overall weight of all SBT over a series of transhipments. Tables 4 and 5 provide the same information for *in-port* transshipment/ CDS information received.

The following points summarise only the transshipment information received by the Secretariat for Japan, Korea and Taiwan for 2022 and the first half of 2023 and do not include Indonesia's at-sea transhipments of SBT:

- All of the at-sea transhipments were observed during 2022;
- Observer deployment requests specifying that SBT were to be transhipped were received for all reported SBT transhipments at sea during 2022;
- Observer deployment requests specifying that SBT were to be transhipped have been received for 97.7% of all reported SBT transhipments at sea during the first half of 2023;
- The Secretariat received 58 transshipment declarations for transhipments at sea totalling 1,870.8t during 2022 and has received 17 transshipment declarations totalling 242.1t for the first half of 2023;
- To date the Secretariat has received 39 transshipment declarations for in-port transhipments during 2022 totalling 1,415.5t and 3 transshipment declarations for in-port transhipments totalling approximately 4.7t that occurred during the first half of 2023. It is not yet possible to check whether any additional in-port transhipments occurred for this period, because CMFs for the 2nd quarter of 2023 are not due to be submitted to the Secretariat until 30 September 2023;
- Observer reports have been received for 91% of all reported 2022 at-sea transhipments.
- To date, transshipment observers have observed 5.9% (1) at-sea transhipments that occurred during the first half of 2023. There have not been any unobserved at-sea transhipments of SBT during the first half of 2023; and
- Table 3 of **Attachment A** provides a summary of transshipment weights recorded on transshipment declarations, observer reports, and CDS information for the 2022 calendar year. To enable valid comparisons to be made, this table presents data for only those transhipments for which the Secretariat has received both transshipment declarations and observer reports and has been able to match these transhipments with CDS documents.

4. GUIDELINE ON PRINCIPLES FOR ACTION AND STEPS TO BE TAKEN IN RELATION TO EXTRAORDINARY CIRCUMSTANCES (CPG5)

The Secretariat notes that it has not received any CPG5 notifications from any Member since CCSBT 29 in October 2022.

5. RECORDS OF AUTHORISED VESSELS AND FARMS

Consolidated List of Authorised Vessels (CLAV)

Updated vessel information continues to be shared with the joint tuna Regional Fisheries Management Organisations' (RFMOs') Consolidated List of Authorised Vessels (CLAV) through automated updates between the CCSBT and the CLAV which occur daily.

However, no maintenance of the CLAV has occurred since funding ceased in October 2019. Note that the Tuna Compliance Network (TCN) discussed the CLAV at its in-person meeting during late June 2023, where ICCAT and the IOTC expressed interest in exploring options to reinvigorate the CLAV. The TCN agreed to explore the current status of the CLAV and what options (if any) might be available to reinvigorate this initiative in future.

Authorised Farm and Vessel Records

The Secretariat continues to receive authorised farm and vessel updates approximately twice a week, with vessel updates containing up to one hundred vessels. Upon receipt of this information, the Secretariat updates its authorised vessels/farms database as well as the CCSBT web site.

Authorised Fishing Vessels: IMO Number Requirement

Paragraph 3 of the CCSBT's 'Resolution on a CCSBT Record of Vessels Authorised to Fish for Southern Bluefin Tuna', includes the following IMO numbering requirements:

3. Members and Cooperating Non-members shall ensure that the following categories of fishing vessels in the CCSBT Record of Authorised Vessels have IMO numbers issued to them:

- all fishing vessels (except wooden and fibreglass vessels) flying their flag that are authorised to catch SBT, and that are at least 100 gross tonnage in size, and*
- effective from 1 January 2021, wooden and fibreglass fishing vessels flying their flag that are authorised to catch SBT, and that are at least 100 gross tonnage in size, and*
- effective from 1 January 2022, all motorised inboard fishing vessels of less than 100 gross tonnage down to a size limit of 12 metres in length overall (LOA) authorised to operate outside waters under the national jurisdiction of the flag State.*

Currently there is almost 100% compliance with the first two dot-points of paragraph 3 of CCSBT's Authorised Vessel Resolution (see above). For fishing vessels authorised between 1 July 2022 to 30 June 2023 that are recorded as being 100 tonnes in weight or more, the Secretariat notes that:

- IMO numbers were submitted to the Secretariat where required for the fleets of all distant water fishing Members (EU, Japan, Korea and Taiwan);
- IMO numbers were submitted for all relevant Australian, Indonesian and South African fishing vessels; and
- There were nine New Zealand fishing vessels greater than 100 gross tonnage which were CCSBT-authorized for 7-8 months from January 2022 until mid-August/early September 2022 which had no IMO number⁴ recorded at that time. None of those vessels are currently CCSBT-authorized and so no IMO number is required now.

⁴ Due to its observation that unexpected SBT bycatch events appeared to be coming more common in its waters, in early 2022 New Zealand decided to CCSBT-authorise virtually its entire fleet in order to try and avoid future occurrences of

Information on Freezing Capacity

Freezing capacity information has been provided for all vessels newly authorised in 2023.

Vessels Authorised to Operate Outside Members' Waters of National Jurisdiction

For non-distant water fleets, it has been time-consuming and not always possible to report on paragraph 3, dot-point 3 of CCSBT's Authorised Vessel Resolution (see above) because the Secretariat has to date not specifically collected information on whether CCSBT-authorised vessels are authorised to operate outside each Member's waters of national jurisdiction.

To try to resolve this issue and facilitate enhanced monitoring of compliance with paragraph 3 (dot-point 3) in future, the Secretariat has this year proposed a modification to CCSBT's Authorised Vessel Resolution (refer to paper CCSBT-CC/2310/09) to collect information on whether vessels are authorised to operate outside each Member's waters of national jurisdiction. Noting the current reporting difficulties, the Secretariat has deferred reporting on paragraph 3 (dot-point 3) until 2024 when potentially the additional new information will be available.

6. VESSEL MONITORING SYSTEM (VMS)

Three Members reported some VMS failures during 2021/22/23, but no Members reported any VMS non-compliance.

In their National Reports to CC18/EC30:

- Japan reported 2 vessels where the VMS was inactive, either for 2 weeks or 7 months during 2022/23. No other information was given about these events.
- Korea reported that one of its vessels:
"..... had multiple temporary failures of the primary VMS on board for the following periods: 1) June 17 to 27, 2) July 3 to 8, 3) July 12 to 24. FMC received the list of missing positions from an alternative MTU on board the vessel and sent it to the ICCAT Secretariat."
- New Zealand reported that during the 2021/22 fishing season, the Ministry for Primary Industries issued four direction notices for SBT vessels which had reported a VMS unit failure. All failures occurred within New Zealand's exclusive economic zone.

7. CCSBT IUU VESSEL LIST

In October 2019, CCSBT's IUU Vessel List was revised to include a provision to cross-list vessels from the IUU Lists of eight other organisations onto the CCSBT's IUU Vessel List, but only in cases where the RFMO concerned was the original IUU listing organisation.

The eight organisations the CCSBT agreed to cross-list vessels from are the Inter-American Tropical Tuna Commission (IATTC), the International Commission for the Conservation of Atlantic Tunas (ICCAT), the Indian Ocean Tuna Commission (IOTC), the Western and Central Pacific Fisheries Commission (WCPFC), the Commission for the Conservation of

vessels which are not CCSBT-authorized by-catching SBT. New Zealand advised that this decision contributed to some of its fishing vessels not having the required IMO numbers when initially CCSBT-authorized.

Antarctic Marine Living Resources (CCAMLR), the South East Atlantic Fisheries Organisation (SEAFO), the Southern Indian Ocean Fisheries Agreement (SIOFA) and the South Pacific Regional Fisheries Management Organisation (SPRFMO).

In late 2019 and early 2020, the Secretariat collated an initial CCSBT IUU List consisting of all appropriate cross-listed vessels from the eight nominated organisations above. This initial CCSBT IUU List included 116 cross-listed vessels and was first posted on the CCSBT’s website in February 2020. In August 2023, CCSBT’s IUU List included 146 cross-listed vessels and no vessels independently IUU-listed by the CCSBT.

8. MINIMUM STANDARDS FOR INSPECTIONS IN PORT

The Resolution for a CCSBT Scheme for Minimum Standards for Inspection in Port was adopted in 2015 and came into effect from 1 January 2017 and includes a number of obligations for Port State Members.

Designated Points of Contact and Ports

The Resolution requires that each Member wishing to grant port access to ‘foreign fishing vessels’ (including carrier vessels other than container vessels) carrying SBT or fish products originating from SBT submits to the CCSBT Secretariat:

- A designated point of contact for receiving inspection reports, and
- A list of designated ports to which ‘foreign fishing vessels’ may request entry.

This information has been provided by all Members.

Port Inspection Reports

Paragraph 15 of the Resolution requires that:

15. Each year Members shall inspect at least 5 % of landing and transshipment operations in their designated ports as are made by foreign fishing vessels.

Further, paragraph 20 specifies that:

20. The port Member shall transmit a copy of the inspection report to the CCSBT Secretariat no later than 14 days following the date of completion of the inspection. If the inspection report cannot be transmitted within 14 days, the port Member should notify the CCSBT Secretariat within the 14 day time period the reasons for the delay and when the report will be submitted.

Table 1 outlines the Secretariat’s interpretation of the number of inspections that need to be conducted to meet the ‘at least 5%’ port inspection requirement.

Table 1: Number of Required Inspections (to meet the ‘at least 5%’ inspection requirement)

Number of landing/ transshipment operations occurring in designated ports	Number of inspections required by Members to meet the requirements of paragraph 15, “at least 5% of landing and transshipment operations in their designated ports as are made by foreign fishing vessels”
1 – 20	1 ⁵
21 – 40	2
41 – 60	3
61 – 80	4
81 – 100	5

⁵ Inspecting no (0) landing and transshipment operations out of 1-20 operations, would mean that 0% were inspected and the minimum threshold of ‘at least 5%’ would not be met

For the 2022 calendar year, Japan, South Africa and Taiwan reported foreign fishing vessels/ carrier vessels with SBT/SBT products on board conducting landing/transshipment operations in their designated ports. However, only South Africa and Taiwan reported carrying out and submitted port inspection documents to the Secretariat. South Africa also submitted three inspection reports for vessels which did not have any record of SBT being on board. Those three reports have been excluded from this analysis/Table 2 below.

Table 2 provides a summary of the port inspection reports that were provided (or not), how many reports were submitted within the required 14-day period, whether appropriate notifications were received for any reports that were submitted late and/or have not yet been submitted, and whether the inspection requirement of ‘at least 5%’ was met.

Table 2: Summary of 2022 Port Inspection Reports Required/Submitted (NA is ‘Not Applicable’)

Member	Total No. of Landing/ Transshipment Operations by ‘Foreign Fishing Vessels’ ⁶ (carrying SBT/SBT products)	Number of Inspection Reports Received for ‘Foreign Fishing Vessels’ (carrying SBT/SBT products)	Percentage of Inspection Reports Received within the Required 14-Day Timeframe	Number of Notifications Received that Inspection Reports would be Submitted Late	Was the ‘at least 5%’ inspection requirement met? ⁷
Japan	10	0	NA	NA	No
South Africa ⁸	<i>Not yet available</i>	10	0%	0	<i>Not yet available</i>
Taiwan	3	3	100%	NA	Yes

In summary:

- Japan recorded 10 relevant port visits and no inspections. Therefore, Japan did not meet the ‘at least 5%’ port inspection requirement for 2022. Japan also did not meet this requirement in 2021.
- Taiwan met and exceeded the ‘at least 5%’ port inspection requirement in 2022 and complied with the 14-day timeframe for submitting port inspection reports to the Secretariat.
- It is not yet known whether South Africa met/exceeded the ‘at least 5%’ port inspection requirement in 2022 because at the time of finalising this paper, South Africa’s annual report to CC/EC had not yet been received.
- South Africa did not comply with the 14-day timeframe for submitting port inspection reports. As in previous years, South Africa provided all of its 2022 port inspection reports late and did not provide any notifications regarding the reason(s) for the delay(s) and when to expect the delayed reports as is required by the Resolution. It is also possible that some relevant port inspection reports have not yet been submitted to the Secretariat. The Secretariat will confirm this with South Africa.

⁶ As provided in Members’ annual reports to the CC/EC

⁷ Based on the port inspection data received by the Secretariat

⁸ The Secretariat has not yet received South Africa’s annual report to CC18/EC30 therefore it is unknown how many total landing/transshipment operations by foreign vessels carrying SBT/SBT products occurred in South African ports during the 2022 calendar year. This means that the percentage that were inspected cannot be calculated yet.

9. SUMMARY

It is recommended that CC18 notes the:

- USA's important voluntary cooperation with respect to providing quarterly CDS submissions to the Secretariat;
- Transshipment summary information provided at **Attachment A**;
- VMS failure issues noted by Japan, Korea and New Zealand;
- Brief updates on Compliance Policy Guideline 5 (CPG5) and the current status of the CCSBT's IUU Vessel List and the IUU cross-listing process; and
- Port inspection information submitted to the Secretariat.

CC18 is invited to consider the areas of compliance concern described in this paper and make any appropriate recommendations regarding these which include:

- Indonesia not meeting the obligations of CCSBT's Transshipment Resolution for 226 at-sea transshipments involving SBT for its LSTLVs during 2022;
- Japan not meeting the 5% minimum port inspection requirement of landing and transshipment operations for foreign 'fishing' vessels with SBT/SBT products on board in its designated ports during 2022;
- South Africa's continued late submission of port inspection reports without the required notification of delay or the reasons for the delays being provided within the required 14-day time period (refer to paragraph 20 of the, '*Resolution for a CCSBT Scheme for Minimum Standards for Inspection in Port*'). South Africa has not provided any relevant port inspection reports within the required 14-day timeframe since the Resolution came into effect in 2017.

Prepared by the Secretariat

Attachment A

Table 1: Summary of Transhipments at sea during the 2022 Calendar Year

Fishing Vessel Flag	From Transhipment Declarations (TDs)			From Observer Reports	
	Number of Transhipments	Total Net Weight (kg) of SBT	Product Type	Number of Transhipments	Total Net Weight (kg) of SBT
Indonesia	0 <i>No TD available</i> ⁹	<i>No TD available</i>	<i>No TD available</i>	22	29,775
Indonesia	148	208,082	GGO	74 ¹⁰	122,553 ¹⁰
Indonesia	45	13,448	GGT	14 ¹¹	4,147
Indonesia	11	21,800	RD	11	21,800
Japan	16	1,052,826	GG	16	1,081,649
Korea	2	259,029	GG	2	263,906
Taiwan	39	545,489	GG	35 ¹²	495,021 ¹²
Taiwan	1	13,436	GGT	0 ¹²	0 ¹²
TOTAL	262	2,114,110		174	2,018,851

Table 2: Summary of Transhipments at sea during the first half of the 2023 Calendar Year¹³

Fishing Vessel Flag	From Transhipment Declarations			From Observer Reports ¹⁴	
	Number of Transhipments	Total Net Weight (kg) of SBT	Product Type	Number of Transhipments	Total Net Weight (kg) of SBT
Japan	1	68,646	GG	1	68,646
Taiwan	16	173,421	GG	0	0
TOTAL	17	242,067		1	68,646

⁹ There are 22 Indonesian transhipments involving SBT for which there are no transhipment deployment requests/declarations but there is transhipment observer report information available.

¹⁰ Transhipment observer report information is only available for 74 of the 148 GGO SBT transhipments recorded on transhipment declarations

¹¹ Transhipment observer report information is only available for 14 of the 45 GGT SBT transhipments recorded on transhipment declarations

¹² Not all/no observer reports have been received yet

¹³ Excluding at-sea transhipments conducted by Indonesia

¹⁴ Only 1 of the relevant observer reports has been received to date for the first half of 2023 – observer reports are not received until some time after the Observer has disembarked from the Carrier Vessel

Attachment A

Table 3: Summary of Transhipments at sea versus CDS Forms versus Observer Reports for the 2022 Calendar Year¹⁵

Fishing Vessel Flag	Comment	Number of Transhipments	Total Net Weight (kg) from Transhipment Declaration	Total Net Weight (kg) from CDS	Total Net Weight (kg) from Observer Report
Indonesia	Observer provided SBT weights	20	<i>Not available</i>	29,727	29,395
Indonesia	Observer provided SBT weights	98	145,021	148,501	147,840
Japan	Observer provided SBT weights	16	1,052,826	1,048,807	1,081,649
Korea	Observer provided SBT weights	2	259,029	259,029	263,906
Taiwan	Observer provided SBT weights	35	495,553	501,316	495,021
Indonesia	No observer report available	90	68,420	96,745	-
Taiwan	No observer report available	5	63,372	64,975	-
TOTAL		266	2,084,221	2,149,100	2,017,811

Table 4: Summary of Transhipments that occurred in port during the 2022 Calendar Year¹⁶

Fishing Vessel Flag	From Transhipment Declarations			From CDS		
	Number of Transhipments	Total Net Weight (kg) of SBT	Product Type	Number of Transhipments	Total Net Weight (kg) of SBT	Product Type
Japan	3	253,281	GG	3	245,658	GGT
Korea	8	768,846	GG	8	768,846	GGT
Taiwan	27	391,907	GG	28	393,980	GGT
Taiwan	1	1,486	GGT			
TOTAL	39	1,415,520		39	1,408,884	

Table 5: Summary of Transhipments that occurred in port during the first half of the 2023 Calendar Year¹⁶

Fishing Vessel Flag	From Transhipment Declarations			From CDS		
	Number of Transhipments	Total Net Weight (kg) of SBT	Product Type	Number of Transhipments	Total Net Weight (kg) of SBT	Product Type
Taiwan	1	2,645	GG			
Taiwan	2	2,028	GGT	3	4,673	GGT
TOTAL	3	4,673		3	4,673	

¹⁵ This report is limited to transhipments where observer reports have been provided, and where the Secretariat has been able to match CDS information

¹⁶ Transhipments conducted in port are not part of the CCSBT Transhipment Regional Observer Program, and therefore no observer deployment requests nor observer reports are required to be submitted for these transhipments. Only Transhipment Declarations are required to be submitted.