

CCSBT-CC/2310/14

Potential Non-Member Fishing Activity/Trade & Trade Summaries

1. Introduction

This paper provides:

- A brief summary of communication with Non-Cooperating Non-Members (NCNMs) since CCSBT 29;
- An update concerning CCSBT's relationship with Trygg Mat Tracking (TMT) and information about an intelligence report produced for the Secretariat by TMT during 2023 using the existing contingency fund;
- An update on any NCNM SBT catch reported to ICCAT¹ since CCSBT 29 (nil);
- An update on provision of new (2022) national trade data summaries by the EU and Indonesia;
- A brief summary of SBT trade information for 2020 to 2022 extracted from the United Nations (UN) COMTRADE database; and
- A proposal to discontinue the presentation of COMTRADE data usually included in this paper.

2. Communications with Non-Members

Since CCSBT 29 the Secretariat has had limited communications with various non-Members including Panama (regarding a Carrier Vessel name change), the Republic of the Seychelles (request for observer status for the 2023 meetings of the Extended Commission and Compliance Committee), Singapore (regarding a potential Carrier Vessel inspection), Viet Nam (regarding potential cooperation with the CDS), and the USA.

USA

The USA has voluntarily cooperated with the CCSBT's Catch Documentation Scheme (CDS) since 2015/16 and continues to do so by providing quarterly submissions of CDS import forms. Note that during 2022, the USA confirmed that:

"Under U.S. regulations, all imports of SBT into the United States are required to be accompanied by a CCSBT CDS form. Importers must enter the relevant information into our electronic International Trade Data System (ITDS), and when the SBT product code is selected, the system then requires that an accompanying CDS form be uploaded."

The USA's voluntary cooperation 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 USA², as well as an increasing number of cases found during the CDS reconciliation process where the exporter has not (yet) submitted its export forms, but the Secretariat has received the USA's import information. Many initially missing export forms are subsequently identified and then submitted to the Secretariat as a result of this CDS reconciliation process.

¹ International Commission for the Conservation of Atlantic Tunas

² Refer to paper <u>CCSBT–CC/2310/14</u>

Singapore

The Secretariat initiated communications with the Singapore Food Agency during May 2023 to explore the possibility of arranging a port inspection of a Carrier Vessel the Secretariat understood to be of higher risk in terms of potentially having unreported Southern Bluefin Tuna (SBT) on board. Singapore advised that, "*due to safety considerations and in view of the vessel's short duration at the anchorage, we regret to inform that we will be unable to inspect the vessel at the anchorage*". Singapore did offer to share information on the vessel's arrival/departure times as well as the onboard manifest.

3. Trygg Mat Tracking (TMT) and Analyses Conducted During 2023

Contingency Fund with TMT

In 2018 CCSBT 25 agreed to a small budget (AUD \$20,000) for the Secretariat to contract Trygg Mat Tracking (TMT) on an ad-hoc basis to conduct analyses of Automatic Identification System (AIS) data and examine vessel company relationships. An agreement was signed on 1 February 2019 and an initial payment of AUD \$9,969 (USD \$7,000) was made to TMT to be held in an operating fund pending CCSBT analysis requests. During 2023 the Secretariat requested that TMT conduct an analysis and USD \$2,300 of the initial USD \$7,000 was utilised. Further details of the analysis conducted are provided below.

TMT Intelligence Report (2023)

On 31/03/2023, an anonymous informant approached the Secretariat with claims of potential NCNM catch of SBT occurring in an area around 36°S and 85°E to 95°E. After the Secretariat had conducted some initial follow-up analyses using Global Fishing Watch's (GFW's) free online maps and the <u>Starboard Maritime Intelligence</u> software (free trial period), the Secretariat requested that TMT conduct more detailed analyses to further investigate the information received. TMT was not provided with any information about the informant nor specific vessels mentioned by the informant. As noted in TMT's report summary, the Secretariat provided only general information as follows:

"The CCSBT Secretariat requested assistance with identifying fishing vessels operating within a specified geographical area (area of interest) during a specific time period, with a view to identifying vessels not on the CCSBT list of authorised vessels that may have engaged in fishing for southern bluefin tuna. The CCSBT Secretariat also requested analysis on likely ports of call for any identified vessels. The area of interest is a quadrant between 33 and 39 degrees South and 85 and 97 degrees East. The time period is 22 March 2023 to 5 April 2023."

TMT produced an intelligence report (dated 26/04/2023), which is provided for Members' information at **Attachment A**. The Automatic Identification System (AIS) data³ analysed in this report appear to indicate a lot of fishing activity occurring in an area which is well within the expected geographical distribution of SBT. Notably the data indicates that there are many Chinese-flagged vessels in the area as well as one Seychelles-flagged vessel.

4. Update on Provision of National Trade Data Summaries from the EU and Indonesia

CC15 and CC16 requested that:

• The EU and Indonesia provide the best available annual trade data summaries (volumes of fresh/frozen SBT exported/imported in tonnes) from their own national databases to the Secretariat.

These summaries continue to be provided by the EU and Indonesia and were submitted to the Secretariat during August 2023. They are provided at **Attachment B** for reference.

³ Taking into account the potential limitations of AIS data

5. Check of ICCAT Records for Newly Reported SBT Catch

In 2019, CC14 requested that the Secretariat check ICCAT's website⁴ to confirm whether any new catches of SBT by CCSBT Non-Cooperating Non-Members (NCNMs) have been reported to ICCAT. The Secretariat re-checked ICCAT's website in 2023 and advises that no further NCNM SBT catch has been reported to ICCAT since 2016 (69t by Brazil and 17t by Namibia) and 2017 (1t by Brazil).

6. Summary of Trade Data from the UN COMTRADE Database

A summary of COMTRADE database information for SBT for the period 2020 to 2022 is provided at **Attachment C**. There appears to be no new significant plausible trade activity of SBT recorded. However, the Secretariat notes that Table 1c of **Attachment C** records consistently small exports of frozen SBT from Brazil between 2020 to 2022. The Secretariat will try to contact Brazil to determine whether these exports were actually SBT given that Brazil has reported SBT catch to ICCAT in the past.

Note that a summary of reported trade of live SBT is included although it is almost certain that this apparent live trade reflects product miscoding.

EU Comments Regarding EU Member State SBT COMTRADE Data

In January 2019, the EU provided a letter which was circulated to all Members⁵ which concluded that instead of using COMTRADE figures, ".... the CCSBT secretariat should instead source its trade data analysis mainly from the trade information provided by the EU in its annual compliance report and information based on the implementation of the Catch Documentation Scheme" (the EU's own trade information is provided in Attachment B).

The Secretariat notes that for the period between 2020 and 2022, the CDS database records only three small imports into the EU in 2022, including 5kg imported by the Netherlands and 136.4kg imported by unspecified EU Member countries. The EU's annual report to the Compliance Committee (CC) and Extended Commission (CC) records 136kg⁶ of SBT imports and 275kg⁷ of SBT exports in 2022. COMTRADE indicates a higher level of SBT trade by EU Member States, however, based on practical constraints, live and/or fresh trade of SBT can almost certainly be attributed to miscoding.

Similarly for the USA, any exports of fresh SBT that are recorded on the COMTRADE database can almost certainly be attributed to miscoding due to practical constraints.

COMTRADE: Exports and Re-exports (Attachment C: Tables 1a-e)

Indonesia's SBT exports (which were approximately 550t in 2020, greater than 550t in 2021 and greater than 450t in 2022), continue to be under-represented in all years for which SBT-specific commodity code COMTRADE data are available.
COMTRADE records 24.4t and 85.97t of total exports (fresh and frozen SBT-specific product combined) for 2020 and 2021 respectively. In its 2021 paper⁸, Indonesia explained that its SBT-specific commodity codes were being converted to more generic non-SBT-specific commodity codes when exported, advising that, "There is a

⁴ <u>https://www.iccat.int/en/t1.asp</u>

⁵ CCSBT Circular #2019/006, refer to Attachment D of CCSBT-CC/1910/10

⁶ This figure quite closely matches the weight of EU imports of SBT recorded on the CDS

⁷ The EU's associated comment was that: "The mismatch between the imports and the exports, and the fact that are no catches of SBT by EU vessels strongly suggest that the trade figures need to be considered as mislabelled trade of other tuna species. This was also the conclusion of the internal analysis undertaken by the EU in the past concerning similar cases."

⁸ CCSBT-CC/2110/21

validation process at BPS that shifted the SBT product from the HS code 03023600⁹ and 03034600¹⁰ to HS code 03048700¹¹, 16041411¹², and 16041490¹² since they were processed products." This conversion to generic tuna/fish codes could explain why Indonesia's SBT exports and re-exports are under-represented on COMTRADE.

- South Africa's COMTRADE combined fresh/frozen export figures between 2020 and 2022 are generally similar to, but slightly higher than those estimated by the CDS. South Africa's COMTRADE export figures for 2020, 2021 and 2022 are 71.8t, 93.9t and 94.6t respectively, and its CDS export estimates are 69t, 74.2t and 74.5t for 2020, 2021 and 2022 respectively.
- Note the 5.1t, 3.9t and 6.3t of frozen exports of SBT from Brazil recorded on the COMTRADE database for 2020, 2021 and 2022 respectively (Table 1c).
- Note the 14.12t of frozen exports/re-exports by Fiji in 2021 (Tables 1c/1e).
- The USA is recorded as having significant exports of fresh/chilled SBT 97.9t, 24t and 4.5t for 2020, 2021 and 2022 respectively. As has been noted in past years, due to practical constraints, this seems likely to be miscoded product.
- Between 2020 to 2022, COMTRADE statistics record very small quantities of SBT exported by EU Members, except for Italy which is recorded as exporting 46.9t and 711.6t of fresh SBT in 2020 and 2021 respectively. This must be miscoded product as it's logistically not feasible that Italy could be exporting fresh SBT.
- There are also some significant unexpected fresh/chilled export figures recorded for Tunisia (1,531.2t in 2020 and 31.62t in 2021). From a practical perspective, it is extremely unlikely that these exports can be SBT and are again likely to be the result of product miscoding.

COMTRADE: Imports (Attachment C: Tables 2a-c)

- For 2020 to 2022, the COMTRADE database records SBT imports by EU Members, including larger imports of frozen SBT by Italy in 2020 (99.3t), 2021 (42.3t) and 2022 (33t). These figures appear to indicate that species miscoding by EU Member States is continuing to occur.
- COMTRADE records large imports of fresh SBT into the USA in 2020 (129.5t), 2021 (420.2t) and 2022 (338.3t); frozen imports are much less between 17t and 31t per annum.
- COMTRADE records significant imports (fresh and frozen imports combined) of SBT into Canada between 2020 and 2022: 71t (2020), 200.3t (2021) and 23.6t (2022). However, the CDS records only 0.4t of SBT exported to Canada in 2020, 13.9t in 2021 and 9.2t in 2022.
- Malaysia is also recorded by COMTRADE as being a significant SBT importer 555.6t and 112.97t of frozen product in 2020 and 2021 respectively. The Secretariat examined the COMTRADE database in more detail to determine where COMTRADE records the Malaysian imports originating from which was primarily the Netherlands (refer to the table on the next page). Note that the trade statistics the EU provided from its own database do not indicate any trade of SBT by the Netherlands or Poland in 2020 or 2021.

⁹ Southern bluefin tunas (*Thunnus maccoyii*), fresh or chilled

¹⁰ Southern bluefin tunas (*Thunnus maccoyii*), frozen

¹¹ HS code 030487: Fish fillets; frozen, tunas (of the genus *Thunnus*), skipjack or stripe-bellied bonito (*Euthynnus (Katsuwonus) pelamis*)

¹² HS code 160414: Fish preparations; tunas, skipjack and Atlantic bonito (sarda spp.), prepared or preserved, whole or in pieces (but not minced); Indonesia described commodity codes 16041411 and 16041490 as, "Tuna, whole or in pieces, but not minced, prepared or preserved, in airtight containers for retail sell", and "Tuna, skipjack and bonito (Sarda spp.), whole or in pieces, but not minced, prepared or preserved, not in airtight containers for retail sell" respectively

Table: Source Country of Malaysian Imports Recorded on COMTRADE

(all values in the table are net weights in tonnes)

Originating State of Malaysian SBT Frozen Imports (from COMTRADE)	2020	2021	2022
Australia		0.01	
EU - Netherlands ¹³	553.95	111.07	
EU - Poland ¹³			
Japan	1.65	0.03	
Taiwan		1.86	
China			
Total	555.60	112.97	0.00

7. Consideration of COMTRADE Analyses for Future Years

After reporting on COMTRADE data for a number of years, the limitations of the COMTRADE data have become apparent. In addition, given that a summary of the most recent calendar year's SBT fresh/frozen exports and imports from COMTRADE is already provided in the Secretariat's Compliance with Measures paper¹⁴, the Secretariat recommends that the COMTRADE database tables presented in this paper (**Attachment C**) are discontinued.

8. Action Required

CC18 is invited to:

- Note the information presented in this paper; and
- Decide whether to support and recommend the Secretariat's proposal to discontinue (after CC18) the presentation of COMTRADE data usually provided in this paper (refer to **Attachment C**).

Prepared by the Secretariat

¹³ The European Union questioned the reliability of COMTRADE data for its SBT trade and has provided separate information (**Attachment B**) as being the best source of SBT trade information for the EU.

¹⁴ Refer to paper CCSBT-CC/2310/04 – Attachment C, (C) Markets – Table iv) COMTRADE Table of Imports of Fresh plus Frozen SBT, and Table v) COMTRADE Table of Exports of Fresh plus Frozen SBT

This attachment is only available in the Members version of this report

EU and Indonesian National Trade Data Summaries Provided for 2018 to 2022

CC15 and CC16 tasked the European Union and Indonesia with providing the best available annual trade data summaries (volumes of fresh/frozen SBT exported/imported in tonnes) to the Secretariat from their own national databases for the 2018 to 2021 period inclusive. Both Members continue to provide this information.

A summary of the information provided for the period 2018 to 2022 inclusive by the EU and Indonesia is attached below.

European Union

2018 – 2020 Calendar Years

The Information provided by the EU on 16/07/2021 for 2018 to 2020 inclusive was:

"As requested in the 2020 Annual Meeting, the volumes of fresh/frozen SBT exported and imported (from the EU Member States national databases) for the years 2018, 2019 and 2020, were:

- No exports of SBT during the referred period.
- Imports only in 2019: 0.447 ton. of Dressed-Tail off (DRT) Southern Bluefin Tuna (imported in Germany from Australia)."

2021 Calendar Year

The information provided by the EU on 23/08/2022 for 2021 was:

".... our records for 2021 do not show any imports or exports from/to third countries of SBT into the EU."

2022 Calendar Year

The information provided by the EU on 08/08/2023 in its annual report to CC18/EC30 was:

"The trade figures for 2022 show very limited SBT imports from third countries into the EU (136 kg) and exports (275 kg) from the EU. The mismatch between the imports and the exports, and the fact that are no catches of SBT by EU vessels strongly suggest that the trade figures need to be considered as mislabelled trade of other tuna species. This was also the conclusion of the internal analysis undertaken by the EU in the past concerning similar cases. To support this conclusion, it has to be noted that the trade concerns fresh or chilled SBT, which is practically impossible due to logistic reasons."

Note:

The Secretariat has received an import REEF from the Netherlands for 2022 that confirms the Netherlands imported 5kg net weight of processed SBT during 2022. The Secretariat has also received two export forms from South Africa that record exports of 136.4kg combined to the EU during 2022.

Indonesia

2018 – 2020 Calendar Years

On 26/07/2021, Indonesia provided the following export information for 2018 to 2020 which it emphasised was based on its CDS export data for CMFs and REEFs:

Indonesia SBT export 2018 - 2020

												Tonnes
					SBT E	xported to						
Calendar Year	Japan	Korea	USA	Australia	Thailand	Vietnam	Lebanon	China	Saudi Arabia	Jordan	Singapore	TOTAL
2018	55.7	0.03	386.9	0.03	0	0	3.1	0.03	0	0	0	445.7
2019	29.2	0.8	363.2	0	0	5.4	23.7	0.4	0.2	2.0	0.4	425.2
2020	24.9	0	509.6	0	0.3	10.4	3.0	0.01	0.5	0.8	0	549.6

On 27/07/2021 Indonesia also confirmed that:

"Based on our data, there were no imported SBT to Indonesia on 2018, 2019 and 2020."

2021 Calendar Year

On 26/08/2022, Indonesia provided the following export information for 2021 which it emphasised was still based on its CDS export data for CMFs and REEFs.

Indonesia SBT export for 2021

_									Tonnes
				SBT	Exported to	D			
	Calendar Year	Japan	USA	Thailand	Vietnam	Lebanon	Jordan	Philippines	TOTAL
[2021	39.3	459.6	40.6	5.2	2.8	3.5	12.8	563.7

Indonesia also confirmed that there were no recorded SBT imports into Indonesia during 2021.

2022 Calendar Year

On 22/08/2023, Indonesia provided the following export/import information for 2022 which it again emphasised was still based on its export and import data for CMFs and REEFs.

• Indonesia SBT **export** for 2022

					Tonnes
		SBT Exp	orted to		
Calendar Year	Japan	NSA	Thailand	Korea	TOTAL
2022	30.68	405.08	32.26	0.16	468.18

• Indonesia SBT import for 2022

		Tonnes
	SBT Imported from	
Calendar Year	Japan	TOTAL
2022	0.01	0.01

COMTRADE DATABASE EXPORT, RE-EXORT & IMPORT FIGURES: 2020 - 2022

Note:

Non-Cooperating Non-Members (NCNMs) appear in the bottom half of all tables and are shaded in light grey. *tbc – indicates data are not yet available*

EXPORTS and RE-EXPORTS

Table 1a – Exports: Live SBT (Commodity Code 030195) Note: It is almost certain that this apparent live trade is due to miscoding.

Exporter	Quantity (tonnes)				
Exporter	2020	2021	2022		
Australia	0.78		0.17		
EU-France ¹	0.25				
EU-Greece ¹	1.84				
EU-Italy ¹	0.01	0.04	0.06		
Brazil					
Fiji			0.15		
Morocco		0.01			
Mozambique	0.02				
Tunisia		3,205.53			
Grand Total	2.90	3,205.58	0.38		

Table 1b – Exports: Fresh/Chilled SBT (Commodity Code 030236)

Funerhead	Quantity (tonnes)				
Exporter	2020	2021	2022		
Australia	2,269.63	650.57	580.59		
EU-France ¹	1.03	0.26	0.81		
EU-Greece ¹			0.47		
EU-Ireland ¹			0.01		
EU-Italy ¹	46.94	711.60	0.33		
Indonesia ¹	12.54	32.92	tbc		
Korea	69.81	tbc	178.98		
New Zealand	689.77	635.23	668.78		
South Africa	71.84	93.85	82.63		
Brazil	0.10	0.09	0.02		
Canada		1.58			
Côte d'Ivoire	4.98				
Egypt	0.41				
India			0.27		
Morocco		0.66			
Mozambique	3.05	5.55			
Oman	5.53	5.93			
Tunisia	1,531.22	31.62			
Türkiye			0.07		
United Arab Emirates		3.84			
United Kingdom		0.09			
USA	97.92	23.99	4.54		
Grand Total	4,804.78	2,197.77	1,517.50		

¹ The European Union and Indonesia questioned the reliability of COMTRADE data for their SBT trade and have provided separate information (Attachment B) as being the best source of SBT trade information for them.

Eventer	Quantity (tonnes)				
Exporter	2020	2021	2022		
Australia	6,800.07	7,100.11	7,625.39		
EU-Croatia ¹	0.04				
EU-France ¹	0.29		0.17		
EU-Italy ¹		0.48			
Indonesia ¹	11.86	53.05	tbc		
Japan	7.75	83.87	28.27		
Korea	917.49	1,119.84	tbc		
New Zealand			21.11		
South Africa		0.01	11.92		
Taiwan	673.13	903.93	1,223.01		
Brazil	5.05	3.93	6.25		
Fiji		14.12			
Mauritius			10.76		
Mozambique	3.06	0.04			
Russian Federation	0.05				
USA	10.64	18.20	2.57		
Grand Total	8,429.42	9,297.56	8,929.45		

Table 1c- Exports: Frozen SBT (Commodity Code 030346)

Table 1d – Re-exports: Frozen SBT (Commodity Code 030236)

De eveeter	Quantity (tonnes)			
Re-exporter	2020	2021	2022	
United Arab Emirates		3.84		
USA	20.02	13.87	1.37	
Grand Total	20.02	17.71	1.37	

Table 1e – Re-exports: Frozen SBT (Commodity Code 030346)

Po ovportor	Quantity (tonnes)			
Re-exporter	2020	2021	2022	
Fiji		14.12		
United Arab Emirates				
USA	1.32		1.26	
Grand Total	1.32	14.12	1.26	

IMPORTS

Table 2a – Imports: Live SBT (Commodity Code 030195)

Note: It is almost certain that this apparent live trade is due to miscoding.

lucesetter	Q	uantity (tonne	es)
Importer	2020	2021	2022
Australia	0.78		0.17
EU-France ¹	0.34	0.26	3.69
EU-Germany ¹		0.04	
EU-Greece ¹	3.80	0.89	1.18
EU-Italy ¹	1.26	2.26	1.99
EU-Romania ¹	0.35	0.003	
EU-Slovakia ¹			18.43
South Africa		0.002	
Angola	0.89	0.19	
Bahrain		0.31	1.36
Fiji			0.15
Malaysia		0.36	
Morocco		0.01	
Mozambique	0.02		
Saudi Arabia	7.58		
Seychelles		0.02	
Switzerland	0.001		
Tunisia	524.00	3,205.53	
United Arab		1.01	
Emirates		1.01	
Grand Total	539.02	3,210.86	26.97

Table 2b – Imports Fresh/Chilled SBT (Commodity Code 030236)

Increase	Quantity (tonnes)				
Importer	2020	2021	2022		
Australia	2.79	6.26	59.08		
EU-Denmark ¹	0.003				
EU-France ¹	2.66	13.35	18.73		
EU-Germany ¹	0.001	0.04	0.03		
EU-Italy ¹	3.44	5.52	14.59		
EU-Luxembourg ¹		0.13			
EU-Malta ¹		0.90	0.002		
EU-Poland ¹	0.01				
EU-Romania ¹		0.79	0.89		
EU-Slovakia ¹	0.06				
EU-Sweden ¹		0.25			
Japan	1,190.38	894.69	942.85		
New Zealand	0.15	0.06			
Bahamas	0.02				
Bahrain	0.11	0.01	0.06		
Bermuda	0.00	0.11			
Canada	58.20	147.63	13.28		
China	46.18	39.23	2.10		
Georgia	0.08				
Guatemala			0.12		
Hong Kong	1.50	0.10	0.33		
Macao		0.14	0.01		
Malaysia	0.01	0.07			
Maldives		0.004			
Norway		0.01	0.12		
Qatar			3.25		
Saudi Arabia	30.06	7.64	0.00		
Serbia	0.17		0.01		
Singapore	3.53	4.96	10.70		
Switzerland	0.50	0.25	0.57		
Thailand		0.02			
United Arab Emirates	1.62	6.05			
USA	129.53	420.19	338.32		
Grand Total	1,470.98	1,548.39	1,405.03		

Table 2c- Imports: Frozen SBT (Commodity Code 030346)

Importer	Quantity (tonnes)		
	2020	2021	2022
EU-Croatia ¹		0.21	0.25
EU-Cyprus ¹			2.41
EU-France ¹	0.11		
EU-Greece ¹	8.12	15.41	4.78
EU-Italy ¹	99.27	42.31	33.01
EU-Malta ¹			0.49
EU-Romania ¹		0.47	0.34
Japan	9,701.80	9,213.50	9,251.69
Korea	163.41	276.71	324.19
Angola	19.82		0.04
Bahrain			0.13
Barbados			0.01
Bermuda		2.18	
Bosnia Herzegovina		0.45	
Canada	12.79	52.65	10.33
Dem. Rep. of the Congo		0.02	
Dominican Republic	3.87		4.54
Hong Kong		0.27	40.46
Kuwait	0.30	0.61	
Lebanon		1.20	
Madagascar		0.20	
Malaysia	555.60	112.97	
Maldives		0.01	
Namibia		0.06	
Saudi Arabia	0.12		
Seychelles		0.02	
Singapore	1.62	10.89	19.76
Switzerland	0.003		
Thailand	0.03	45.53	
United Arab Emirates	0.12		
USA	30.32	17.55	25.69
Grand Total	10,597.31	9,793.21	9,718.10