Commission for the Conservation of
Southern Bluefin Tuna

みなみまぐろ保存委員会

CCSBT–TCWG/2602/02

Consideration of actions related to Member and Secretariat reporting to the Compliance Committee

(TCWG Agenda item 2.1)

1. Introduction

This paper includes information to support TCWG discussions in support of the Compliance Committee (CC) delivery of the following agreed actions, which are both scheduled for completion in 2026:

3 a) Ensure Members meet reporting requirements as they relate to describing how they monitor, estimate and report all SBT mortalities.
- Associated risks: Risk 3 (Incomplete reporting of SBT mortalities) and 4 (Not fully attributing all SBT mortalities).

13 a) Consider opportunities to better support CC to discuss and recommend effective follow up action to address identified non-compliance, including through reporting from the Secretariat.
- Associated risks: Risk 13 (Lack of systematic follow-up actions to address non-compliance leading to persistent non-compliance).

It is recommended that TCWG discussions do not extend to reviewing CCSBT Member obligations but should instead focus on reviewing the information that is reported to CC by the Secretariat. The review by TCWG should ensure the CC has the right information to allow it to effectively assess Members compliance with these obligations and effectively addressing the associated risks.

To help focus TCWG discussions, two specific areas of the Secretariat's current reporting to CC have been identified for TCWG consideration:
1. Reporting related of Member monitoring, estimating and reporting all SBT mortalities (in support of action 3 a); and
2. Reporting related of Member implementation of the CDS (in support of action 13 a).

It is not proposed that TCWG review Member performance or whether effective follow-up action has been undertaken. But instead focus on ensuring that CC has the information needed and in a format that best supports it to address these compliance risks.

2. Background

It is important that Secretariat reporting to the CC is regularly reviewed to ensure that it continues to provide the information required by the CC in a format that best supports it to assess compliance with CCSBT obligations and recommend effective follow-up action. The format for the Secretariat reporting has remained largely unchanged since the 6th meeting of the Compliance Committee (CC6 in 2011). This includes reporting related to Members' CDS

implementation and reporting on monitoring, estimating and reporting all SBT mortalities[1]. Whilst regular reviews are important, the Secretariat also suggests that maintaining a level of consistency in format can also be important and help to facilitate more effective comparisons of changes in compliance over time.

In opening CC20, the CC Chair also noted that "the eCDS will streamline the CDS and potentially do away with some of the things we currently monitor, and this provides us with the opportunity to review and refine our compliance effort". The 20th meeting of the Compliance Committee (CC20) agreed to recommend an eCDS implementation date of 1 April 2027. This would mean that, based on current reporting processes, while eCDS implementation will be an important topic of discussion in 2027, the first Secretariat report to CC using data from the eCDS would not be completed until the 23rd meeting of the Compliance Committee in 2028 (CC23).

In considering these actions, TCWG is reminded that CC20 agreed to close the review of the Corrective Actions Policy (CPG3). Therefore, the application of CPG3 is not included as part of these discussions, but instead the focus is on ensuring that the right information is being reported to CC to allow it to perform its defined functions[1].

3. Secretariat Reporting of Member Catches (Action 3a)

The CC annually assesses compliance with all CCSBT conservation and management measures and assesses the quality[2] of Member data submitted to the Extended Commission. Therefore, it is proposed that action 3 a) can be delivered as part of the annual review and assessment that will be undertaken again at CC21. To support this assessment, it is recommended that TCWG review how the Secretariat currently reports Member monitoring, estimation and reporting of all SBT mortalities to ensure that CC21 has the right information to effectively complete action 3 a).

The Secretariat reporting to the CC on Member reported SBT mortalities is included in the Compliance with Measures paper[3]. The Secretariat has compiled a summary of the current CCSBT catch reporting obligations associated with SBT mortalities and the related Secretariat reporting (included as **Attachment A**). This table includes an explanation of what information is reported by the Secretariat, examples of the relevant sections of the Secretariat report from CC20, and the security classification for the category of information reported[4].

TCWG is therefore requested to review the current Secretariat reporting of Members monitoring, estimation and reporting of SBT mortalities to ensure that it contains all the information required to support CC21 to complete Action 3 a) in 2026. Members may also wish to consider if there are additional elements that the Secretariat can include in its reporting to CC21, such as compiling specific additional information from Member annual reports, to better support CC21 to complete this action.

4. Opportunities to Better Support CC – eCDS Reporting (Action 13a)

Action 13 a) is currently scheduled for completion in 2026, but as noted earlier in this paper, there is additional time available for the specific details of the Secretariat's reporting to be

[1] As defined in the Terms of Reference for the Compliance Committee on page 3 of the Terms of Reference for Subsidiary Bodies.

[2] In terms of both accuracy and timeliness.

[3] Attachment A and Attachment B to the paper.

[4] The security classification is important as this can determine whether the specific information can be made publicly available, including in CCSBT meeting papers.

refined to ensure it best supports and informs CC in its assessment of eCDS implementation. It is therefore recommended that TCWG discuss and consider, more broadly, where there may be opportunities to refine and add further value to the Secretariat reporting on CDS implementation to better support the CC considerations and recommendations for effective follow up action. This could include:

- any new elements related to eCDS implementation that could be reported by the Secretariat; or
- adding further detail to existing reporting elements to improve the value of this reporting.

Based on the advice of TCWG, the Secretariat can develop the specific reporting elements and structure, including with the support of the CDS Working Group, for CC consideration.

A summary of the current Secretariat reporting to CC on Member CDS implementation is included as **Attachment B** to this paper. In this summary table, the Secretariat has included the elements of CDS implementation currently reported to CC, along with a comment on how the eCDS implementation is expected to impact this reporting. The Secretariat anticipates that the eCDS implementation will have the greatest impact on reporting in those rows highlighted yellow in the table, with reporting in rows highlighted green expected to be less impacted.

TCWG is therefore requested to review the current Secretariat reporting of Members CDS implementation and recommend changes or additional work required to update the Secretariat's reporting on CDS implementation, with a focus on changes required to support the effective implementation of the eCDS.

5. Summary

The Secretariat invites Members to:

- Review the information included in **Attachment A** and recommend any additional Secretariat reporting that can support CC21 to ensure Members meet reporting requirements as they relate to describing how they monitor, estimate and report all SBT mortalities.
- Review the information included in **Attachment B** and recommend any changes to existing reporting, including any additional elements that could be included in Secretariat reporting on eCDS implementation to better support the CC in its consideration and recommendations for effective follow up action.

Prepared by the Secretariat

Attachment A: Secretariat Reporting Related to Monitoring, Estimating and Reporting all SBT Mortalities

Catch/Allocation Reporting Obligation *(provided for information only)*	**Secretariat Reporting**
	Paper: Compliance with Measures - Attachment A and Member Annual Reports
SBT Mortalities: Paragraph 1 of the **Resolution on Reporting all Sources of Mortality of Southern Bluefin Tuna:** *All Members and Cooperating Non-Members shall, subject to paragraph 2[5], report accurate and complete data on the quantity of all sources of southern bluefin tuna mortality[6] in their national reports presented to the Extended Commission.* Paragraph 3 and 4 of the **Resolution on Limited Carry-forward of Unfished Annual Total Available Catch of Southern Bluefin Tuna:** 3. *If a Member's annual total available catch is under-caught, that Member may carry forward the unfished quota to the following quota year. However, the total quota carried forward from one year to the next shall not exceed 20% of that Member's Effective Catch Limit for the year from which the quota is being carried forward.* 4. *A Member's unfished annual total available catch is equal to the Member's annual total available catch minus the total of all mortalities attributed to that Member for that quota year. The total of all mortalities attributed to that Member shall include the:* a. *Mortality resulting from commercial fishing operations, whether primarily targeting SBT or not; and* b. *The Member's full allowances set aside within their national allocations for:* • *Releases and/or discards;*	**CwM Attachment A:** All sources of SBT mortality **as advised by Member/CNM** (as advised in Members' carry-forward advice received in xxxx)
	Commercially caught/retained mortality *Reported as whether or not this was provided (✓, F, P or X), with quantities reported in Attachment B to the paper.*
	Release/discard/other sources of mortality. *Reported as whether or not this was provided (✓, F, P or X) and the quantity provided in Member reporting.*
	Recreational mortality *Reported as whether or not this was provided (✓, F, P or X) and the quantity provided in Member reporting.*
	Customary or artisanal mortality *Reported as whether or not this was provided (✓, F, P or X) and the quantity provided in Member reporting.*
	Scientific Data Exchange • Total Catch by Fleet • Catch and Effort *Reported as whether or not this was provided (✓, F, P or X), no quantities given in the attachment.*
	Member Annual Reports Members are required to report against: • Catch and allocation – Section 2.1.1 • Allowances and SBT mortality for each sector – Section 2.1.2 • SBT Catch (retained and non-retained) – Section 2.1.3

[5] Paragraph 2 states that "If a Member or Cooperating Non-Member is unable to provide complete and accurate data as required in paragraph 1 of this resolution, they shall report a best estimate of all sources of southern bluefin tuna mortality in their national report to the Extended Commission.

[6] All sources of mortality includes, but is not limited to, "discards and recreational fishing, including the fate –live and vigorous; moribund; dead – of these sources of southern bluefin tuna".

• *Recreational fishing;* • *Customary and/or traditional fishing; and* • *Artisanal fishing* The catch reporting obligations also recognise the definition of "attributable catch" agreed at **CCSBT21**: *A Member or CNM's attributable catch against its national allocation is the total Southern Bluefin Tuna mortality resulting from fishing activities within its jurisdiction or control including, inter alia, mortality resulting from:* • *commercial fishing operations whether primarily targeting SBT or not;* • *releases and/or discards;* • *recreational fishing;* • *customary and/or traditional fishing; and* • *artisanal fishing.*	*Annual reports are only assessed by the Secretariat in their entirety. Individual sections are not currently assessed and reported on independently.* *Security Classification:* *Annual catch estimates and number of vessels stratified by gear and flag has a "No risk" assessment, meaning it can be made publicly available and may be placed on the public area of the CCSBT web site.* *Scientific Data Exchange data (that has not been explicitly identified elsewhere in table 1) has a "Low Risk" assessment which means it is not publicly available, but these data are available to all Members and CNMs without requiring specific approval.* *Member annual reports are made publicly available as part of the meeting documents following the completion of the meetings.*

Reporting from CC20

		Australia	European Union	Indonesia	Japan	Korea	New Zealand	South Africa	Taiwan
Reports and/or Allowances Made for all Sources of SBT Mortality	All sources of SBT mortality **as advised by Member/CNM** (as advised in Members' carry-forward advice received in 2024)								
	Fishing Season:	**2023/24**	**2024**	**2024**	**2024/25**	**2024/25**	**2023/24**	**2024/25**	**2024/25**
	Commercially caught/retained mortality	✓	n/a	✓[35]	✓	✓	✓	F[36]	✓
	Release/discard/other sources of mortality	(0t)	n/a	(0t)	✓(58t)	✓ (7.01t)	✓ (20t)	F[37]	✓ (10t)
	Recreational mortality	✓ (364.5 t)	n/a	(0t)	n/a	n/a	✓ (69.9t)	F (5t)[38]	n/a
	Customary or artisanal mortality	n/a	n/a	(0t)	n/a	n/a	✓ (0t)	n/a	n/a

Table 1: Compliance with Measures		Australia	European Union	Indonesia	Japan	Korea	New Zealand	South Africa	Taiwan
Data	Monthly Catch Reports	✓	✓	✓	✓	✓	✓	F	✓
	Quota Allocation & Final Catch per entity *(due between 01/07/24 & 30/06/25)*								
	• *Initial Allocation*	✓	n/a[1]	✓	✓	✓	✓	X[2]	✓
	• *Final Catch by Vessel*	✓	n/a[1]	✓	✓	✓	✓	F[3]	✓
	Scientific Data Exchange[4]								
	• *Total Catch by Fleet*	✓	n/a[1]	✓	✓	✓	✓	✓	✓
	• *Catch and Effort*	✓	n/a[1]	✓	✓	✓	✓	✓	✓
	• *Size Data*	✓	n/a[1]	✓	✓	✓[5]	✓	✓	✓
	• *Direct Ageing*	tba[6]	n/a[1]	n/a	X[7]	✓	✓	X	✓
	• *Other*[8]	✓	n/a[1]	✓	✓	✓	✓	✓	✓
2024 Members' Reports: Is all information required by Templates	CC/CCSBT	✓	✓	F[39]	✓	✓	✓	F[40]	✓
	ESC	✓[41]	X[42]	✓[43]	✓	✓	✓	✓	✓

Monthly Catch Reporting

Paragraph 96 and 97 of the CCSBT 12 report:

96. Members agreed to implement monthly catch reporting for SBT. It was agreed that Members would provide catch data to the Secretariat on a monthly basis and that this data would be provided no later than one month after the month in which fishing occurred.

97. A technical working group met to agree on the details of the data to be provided as part of monthly catch reporting. The technical group agreed to the following recommendations, and these were adopted by the Extended Commission:

CwM Attachment A:
Monthly Catch Reports

Reported as whether or not monthly reports have been provided on time, no quantities given in the attachment where this assessment is provided.

However, the total estimated whole weight (tonnes) from monthly catch reports is included in Attachment B to the Compliance with Measures paper.

Security Classification:
This information has a "Low Risk" classification, which means it is not publicly available, but these data are available to all Members and CNMs without requiring specific approval.

- …
- Under the monthly catch reporting system, each month each Member and Cooperating Non-Member will provide:
  - total catch for the month; and
  - total cumulative catch for the year to date.
- Reports are to be made to the Secretariat no later than the last day of the following month.

Reporting from CC20

Table 1: Compliance with Measures		Australia	European Union	Indonesia	Japan	Korea	New Zealand	South Africa	Taiwan
Data	Monthly Catch Reports	✓	✓	✓	✓	✓	✓	F	✓

Reporting of initial allocations and final catch by vessel/company

Paragraphs 39 and 40 of the CCSBT 13 report:

39. The Extended Commission further agreed, in order to improve transparency of and confidence in management measures, that all Members and Cooperating Non-Members shall provide to the CCSBT Secretariat in a timely manner information relating to:
    a. the yearly quota and catch allocation arrangements for this fishery either by company, quota holder or vessel; and
    b. the final catch against quota by company, quota holder or vessel at the completion of a vessel's fishing period or fishing year.

40. In the case where Members and Cooperating Non-Members manage through an "Olympic" system members shall only be required to report details in (b).

Intersessional discussion following this decision determined that information on the initial quota allocation is due within two months of the start of the fishing season and that the final catch information is due within 6 months of the end of the fishing season.

CwM Attachment A:
Quota Allocation & Final Catch per entity *(due between xx/xx/xx & xx/xx/xx)*

Initial Allocation / Final Catch by Vessel

Reported as whether or not initial allocation were provided on time.

Security Classification:
This information has a "Medium Risk" classification, which means it is not publicly available and requires specific authorisation to be released.

Reporting from CC20

Table 1: Compliance with Measures	Australia	European Union	Indonesia	Japan	Korea	New Zealand	South Africa	Taiwan
• *Initial Allocation*	✓	n/a[1]	✓	✓	✓	✓	X[2]	✓
• *Final Catch by Vessel*	✓	n/a[1]	✓	✓	✓	✓	F[3]	✓

Member Annual Reports	**Paper: Individual Reports Submitted as Meeting Papers & Compliance with Measures - Attachment A**
• Four weeks prior to the convening of the Compliance Committee, each Member and Cooperating Non-member of the Extended Commission will provide a report providing the following information:	xxxx Members' Report: Is all information required by Templates provided *A single assessment of the entire Member report and if all information has been provided across all requirements.*
• Summary of Monitoring, Control and Surveillance (MCS) Improvements o Improvements achieved in the current fishing season o Extraordinary Circumstances o Future planned improvements o Progress with actions taken to rectify any non-compliance	
• SBT Fishing and MCS o Fishing for Southern Bluefin Tuna o Monitoring catch of SBT o SBT Towing and transfer to and between farms (farms only) o SBT transhipment (in port and at sea) o Port Inspections of Foreign Fishing Vessels/Carrier Vessels (FVs/CVs) with SBT/SBT Products on Board o Monitoring of trade of SBT o Coverage and Type of CDS Audit undertaken	**Section 2 of the Annual Reports Contains the Following:** **2.1 Fishing for Southern Bluefin Tuna** 2.1.1 Catch and allocation 2.1.2 Allowances and SBT mortality for each sector 2.1.3 SBT Catch (retained and non-retained) 2.1.4 The number of vessels in each sector
	2.2 Monitoring catch of SBT 2.2.1 Daily logbooks 2.2.2 Additional reporting methods (such as real time monitoring programs) 2.2.3 Scientific Observers 2.2.4 Vessel Monitoring System (VMS) 2.2.5 At-sea inspections 2.2.6 Authorised vessel requirements 2.2.7 Monitoring of catch of SBT from other sectors (e.g. recreational, customary, etc)
	2.3 SBT Towing and transfer to and between farms (farms only) Observer coverage of tows (%) Observer coverage of transfers (%) Plans to allow adoption of the stereo video systems
	2.4 SBT transhipment (in port and at sea) Quantities and percentage of SBT transhipped at sea and in port List of LSTLVs which have transhipped at sea and in port

	Comprehensive report assessing the content and conclusions of observer reports assigned to CVs that received SBT from flagged LSTLVs.
	2.5 Port Inspections of Foreign Fishing Vessels/Carrier Vessels (FVs/CVs) with SBT/SBT Products on Board The number of landing/ transhipment operations that foreign FVs/CVs carrying SBT or SBT product made in port. The number of those landing/ transhipment operations that were inspected. The number of inspections where infringements of CCSBT's measures were detected.
	2.6 Monitoring of trade of SBT The percentage of landings of SBT that were inspected. The percentage of exports of SBT that were inspected. The percentage of imports of SBT that were inspected.
	2.7 Coverage and Type of CDS Audit undertaken Details on the level of coverage and type of audit undertaken in accordance with 5.8 of the CDS Resolution, and the level of compliance.

• Annex 1. Standing items: details of MCS arrangements used to monitor SBT catch in the fishery.
  ○ Monitoring catch of SBT
  ▪ SBT Towing and transfer to and between farms (farms only)
  ▪ SBT Transhipment (in port and at sea)
  ▪ Port Inspections of Foreign FVs/CVs with SBT/SBT Products on Board
  ▪ Landings of Domestic Product (from both fishing vessels and farms).
  ▪ Monitoring of trade of SBT
  • SBT Exports
  • SBT Imports
  • SBT Markets
  • Other MCS systems of relevance
  ○ Additional Reporting Requirements Ecologically Related Species	

Reporting from CC20

2024 Members' Reports: Is all information required by Templates	CC/CCSBT	✓	✓	F[39]	✓	✓	✓	F[40]	✓
	ESC	✓[41]	X[42]	✓[43]	✓	✓	✓	✓	✓

Attachment B: Secretariat Reporting Related to Implementation of CDS Obligations

Current CDS Reporting		Secretariat Comment on eCDS Implementation
CDS (during XXXX Calendar year	Catching Member CMFs submitted within required timeframe	CDS documents completed in the eCDS will be submitted to the Secretariat in 'real time' as they are completed, so submission timeframes will not be as applicable following eCDS implementation. It is recommended that this reporting could transition more towards monitoring the timeliness of the completion of eCDS documents in the eCDS and we welcome thoughts on this. An example of a timeliness element that Members may wish to consider for reporting would be the difference between harvest and CMF completion (both harvest section and export/LDP section).
	Were compliant CMFs used?	CDS document formats included in the eCDS will not be able to be altered. Therefore, all forms completed in the eCDS will be on 'compliant' CMFs. It is recommended that the Secretariat develop a suite of reporting on the use of 'offline forms' by Members (which will be completed if/when the eCDS is unavailable), and this can include the use of any non-compliant offline forms or offline form numbers. However, the number of offline forms completed annually is expected to be very small.
	Has the Member responded to the issues identified in the Secretariat's 202X final reconciliation report yet?	The Secretariat will maintain current reconciliation processes, noting also that more information on the reconciliation of CDS documents will be available to Members as the forms are completed. Therefore, Secretariat engagement with Members will be ongoing, rather than quarterly, and the errors/warnings included in the eCDS will help ensure more issues will be resolved as the forms are entered. It is recommended that the current timeframe for an annual reconciliation of CDS data be retained (following 31 March for the previous calendar year), and that this reporting element be retained.
	CMFs submitted where Validators were correctly authorised to validate (no. of CMFs with an unauthorised validator is in brackets)/ CMFs were validated correctly	An eCDS user will not be able to validate a form in the eCDS, unless the person is correctly authorised. Therefore, there should be nothing to report with the possible exception of 'offline forms' completed by Members when the eCDS is unavailable. It is recommended that this be captured only as part of the Secretariat reporting on the use of 'offline forms'.
	% of CMFs for Domestic Landings that contain complete and accurate information	Data checks are embedded within the eCDS, but a small number of errors associated with specific fields in a CDS document will be able to be overridden by validators (these have been presented to Members in 2021 and most are proposed only as an interim measure to support implementation). Data checks for certain fields will also only result in a warning, which will not prevent the form being completed and validated. The Secretariat will present an updated paper on the proposed data checks and validation overrides to the eCDS Working Group during 2026. So, there will be a limited number fields that may not contain complete and accurate information so suggest this is retained during initial implementation.
	% of CMFs for Exports that contain complete and accurate information	As above.
	% of CMFs for Domestic Landings with valid authorised vessels (number of CMFs listing an unauthorised vessel are shown in brackets)	eCDS users will be able to associate a vessel with a CMF where it is/was not authorised during the period the SBT was harvested. This will produce an error on the CMF that can be overridden by the validator, so most issues should be resolved at the time the CMF is completed, or shortly afterwards. However, because CMFs associated with unauthorised vessels will be able to be validated, it is recommended that this is retained in Secretariat reporting.
	% of CMFs for Exports with valid authorised vessels (number of CMFs listing an unauthorised vessel are shown in brackets)	As above.
	% of CMFs for Domestic Landings where the catch/harvest weight differs from the landed weight by <= 5%	This will flag an error or warning, depending on the extent of the discrepancy, if it is found on an eCDS record at the time the LDP section of the form is completed. So, a lot of issues should be resolved at the time of completion, or shortly afterwards. The Secretariat can continue to report to CC on any unresolved discrepancies.

	% of CMFs for Exports where catch/ harvest weights are the same on both exporter and importer copies	This will flag an error or warning, depending on the extent of the discrepancy, if it is found on an eCDS record at the time the LDP section of the form is completed. So, a lot of issues should be resolved at the time of completion, or shortly afterwards. The Secretariat can continue to report to CC on any unresolved discrepancies.
	% of CMFs for Exports where SBT catch/harvest numbers are the same on both exporter and importer copies	The number of fish is not currently captured in the import section on CMFs, so this report currently compares the catch harvest numbers of import and export copies. The Secretariat will no longer receive import copies of CDS documents, but the importer will only need to complete the relevant import section. The number of fish is currently included in the import section of the CMF, but Members will need to decide if this is practicable to report.
	% of CMFs with all correctly corresponding CTFs (where required) • *% of CTFs where fish numbers exactly match CMF* • *% of CTFs where fish weights within 5% of CMF*	This will flag an error or warning, depending on the extent of the discrepancy, if it is found on an eCDS record. So, a lot of issues should be resolved at the time of completion of the CDS document, or shortly afterwards. The Secretariat can continue to report to CC on any unresolved discrepancies.
	% of expected Export CMFs submitted to the Secretariat	Import copies of CDS documents will only be able to be completed if the export CDS document has been completed. So, the Secretariat will not receive independent import copies of CDS documents to allow for the reporting of missing export documents. The exception to this will be 'offline forms' but it is recommended that the use of offline forms be reported separately in Secretariat reporting.
CDS (during XXXX Calendar year): Continued	% of expected import copies of CMFs submitted to the Secretariat by the importing Member (number missing is shown in brackets)	This can still be reported but would focus on CMFs that have not been completed by the importing Member. The implementation of the eCDS, including recent changes to support the completion of import sections of CDS documents, is expected to significantly improve the completeness of import information in eCDS documents.
	% of REEFs submitted where Validators were correctly authorised to validate (number of REEFs where validators were not correctly authorised are shown in brackets)	An eCDS user will not be able to validate a form in the eCDS, unless the person is correctly authorised. Therefore, there should be nothing to report with the possible exception of 'offline forms' completed by Members when the eCDS is unavailable. It is recommended that the use of offline forms be reported separately in Secretariat reporting.
	% of expected (re-)export REEFs submitted to the Secretariat by the (re-)exporter (number missing is shown in brackets)	Import copies of CDS documents will only be able to be completed if the export CDS document has been completed. So, the Secretariat will not receive independent import copies of CDS documents to allow for the reporting of missing export documents. The exception to this will be 'offline forms' but it is recommended that the use of offline forms be reported separately in Secretariat reporting.
	% of expected import copies of REEFs submitted to the Secretariat by the intended importing Member (number missing is shown in brackets)	This can still be reported but would focus on REEFs that have not been completed by the importing Member. The implementation of the eCDS, including recent changes to support the completion of import sections of CDS documents, is expected to improve the completeness of import information in eCDS documents.
	Number of Duplicate Tag Numbers Submitted in Tagging Data	The eCDS will not allow for the entry of duplicate tag numbers on the same CMF but will allow the validator to override an error that is produced where duplicate tag numbers are entered on different CMFS. So, most issues with duplicate tag numbers should be resolved at the time the form is completed and/or validated, or shortly afterwards. The Secretariat can continue to report to CC on any unresolved discrepancies. A possible exception will be 'offline forms' completed when the eCDS is unavailable. It is therefore recommended that the use of duplicate tag numbers continue to be reported.

	Secretariat reporting least impacted by eCDS implementation

	Secretariat reporting most impacted by eCDS implementation