Commission for the Conservation of
Southern Bluefin Tuna

みなみまぐろ保存委員会

CCSBT–TCWG/2602/05

The Use and Reconciliation of OT Product Types in the CDS

(TCWG Agenda item 3)

1. Introduction

When CCSBT was developing the CCSBT CDS, a technical working group was established to develop the principles that would underlie the CDS. These principles were agreed at CCSBT12 in 2005 and included that the CDS should:

- Provide for traceability of legitimate product flow to the point of first sale (including auction) for domestic markets or, alternatively, for product being exported.

This principle is also reflected in the preamble to the Resolution on the Implementation of a CCSBT Catch Documentation Scheme (the Resolution) where it notes:

- the need for Members and Cooperating Non-Members to provide for the tracking and validation of legitimate product flow from catch to the point of first sale on domestic or export markets.

The Secretariat is required to conduct reconciliations between the different types of CDS forms and between copies of forms provided by exporters and importers. Part of this reconciliation includes comparing quantities of SBT exported, with the quantities reported as harvested.

At CC20, the Secretariat identified some challenges in undertaking the reconciliation of CDS data between harvest, captured on Catch Monitoring Forms (CMFs) and Re-Export/Export After Landing of Domestic Product Form (REEFs). Being able to reconcile SBT exported on REEFs with catch reported on CMFs is important for Members and the Secretariat to track and validate legitimate product flow and ensure that exports are consistent with reported catch. The challenges highlighted related to product types currently captured under the ‘OT’ code on REEFs. Due to the technical nature of these discussions, CC20 agreed to recommend that this issue be considered by TCWG.

There are two elements to this discussion that have been identified by the Secretariat:

i. consistency in how the ‘OT’ product types are used; and

ii. the process to reconcile product reported as ‘OT’ with harvested catch reported on preceding documents, including the application of conversion factor/s or recovery rate/s (individually or cumulatively) to allow the Secretariat and Members to monitor and reconcile exports with reported catch and track legitimate product flow.

The issues surrounding the use of ‘OT’ codes also impacts the implementation of the eCDS. The eCDS does not have the ability to capture written descriptors for SBT reported as ‘OT’, as is the current practice with paper forms. Therefore, Members have agreed to minimise the use of the ‘OT’ code and instead use specific product type codes to describe the product

being exported. However, what these product type codes are, and how these codes should be used, has not yet been decided.

2. Background

Currently only specific product types, principally used in CMFs, are clearly defined in the CDS Resolution[1]. The CDS Resolution currently requires that any SBT that is not landed in one of these defined product types should be recorded as other (OT). When using the OT product type, the Member is required to include a description of the type of product and, when reporting 'OT' product type on CMFs, also specify a conversion factor. Currently, some of the descriptions provided to explain the 'OT' product type are unclear and can, on occasions, mix different product types or specify more than one product type for a single recorded weight[2]. Conversion factors have also not always been provided on CMF documents when the OT product type has been used, and where these are provided, they often differ considerably from the default conversion factors that are used by the Secretariat to reconcile SBT reported on CDS documents[3].

To support implementation it was agreed that, following eCDS introduction, Members would limit the use of the OT product code and instead use the product type code that best described the processed state of the SBT product[4]. During the CDS working group meetings in 2025, the Secretariat presented a schedule that summarised the number of times product types had been reported by Members on REEFs and CMFs[5] (this schedule has been updated and is included as **Table A in Attachment A** to this paper). During the eCDS Working Group discussions, some Members supported rationalising the number of different product type codes that can be used in the eCDS, but one Member also noted that there was a need to better understand the use, and the associated compliance risks, of these other product types before deciding on any changes.

During 2025, the Secretariat recommenced[6] examining REEFs for potential overutilisation. This examination is undertaken as part of the Executive Secretary's Six Monthly/Annual Reports to the Extended Commission that are outlined in Appendix 4 to the CDS Resolution. The CDS Resolution requires the Secretariat to "examine all REEF forms and associated

---

[1] The defined product types include round, gilled and gutted (both tail on and off), dressed (both tail on and off) and fillets.

[2] In these circumstances there is no way for the Secretariat to know what quantity to apply to what product type description.

[3] As an example, there are 370 CMF records where loins (LOI) are reported as the product type. The average conversion factor applied across these records is 1.75, which is significantly lower than the default conversion factor of 2.5.

[4] In intersessional correspondence in February 2024, Members agreed to minimise the use of the OT code by replacing this with specific processed codes. It is proposed that an 'other' product type will still be available in the eCDS for the small number of occasions that product types may need to be captured that are not available in the eCDS, but these will require follow up from the Secretariat/Members to identify and record the correct product code.

[5] The included product type codes in the table are entered by the Secretariat's based on the written descriptions provided on the CDS documents by exporters.

[6] The Secretariat had previously not produced reports on REEF overutilisation in previous iterations of the Six Monthly/Annual CDS reports since 2014. This was due to challenges in reconciling the data where multiple documents may be listed as contributing to a REEF and/or where exports may occur across different fishing seasons. The challenges in reconciling REEFs were outlined in Circular #2013/063 and a solution was proposed at this time. However, there was no agreement reached in relation to the proposed solution (also see paragraph 55 of the CC9 meeting report). The accuracy of preceding documents recorded on REEFs has improved in recent years, however these challenges still exist with current reconciliation efforts.

CMFs and produce a list of any CMF forms that have been 'over utilised' in subsequent exports and re-exports"[7]. Currently, because of the uncertainty around the product types described on REEFs and the appropriate conversion factors to apply, this report includes only those REEFS where the total processed weight reported on REEFs is greater than the total processed weight reported on the preceding CMF, regardless of the processed state on each document. This means that there may be over-utilisation reported on REEFs that is not currently captured in the Secretariat reporting.

Members have also previously agreed that the eCDS should include a warning where the converted whole weight of fish being exported exceeds the converted whole weight of fish from all preceding documents[8]. In order for these warnings to be developed, and for the Secretariat to most effectively report on potential overutilisation, it is important that there is clear and consistent use of product types, and accurate conversion factors[9] (or a similar tool, such as an expected recovery rate) can be applied to these reconciliation processes.

3. Product types

As noted previously in the paper, there are currently clear and agreed definitions for the product types that are primarily recorded on CMFs (including RD, GGO, GGT, DRO, DRT, and FL). In addition, some Members have previously notified conversion factors for specific product types. It is recommended that TCWG do not need to further consider how any of these product types or conversion factors area used, and that discussions should focus on those product type codes currently reported as 'OT' (primarily on REEFs).

Table A in Attachment A shows that, for data held in the CDS database, 11 product types have been used by the Secretariat to capture the product type reported on CMFs, and 29 product types for REEFs. Of these product types, 24 Codes have been used by the Secretariat to capture the descriptions reported on CDS documents when the 'OT' code has been used. This includes a number of product types that are obtained principally from fillets, and some from other parts of the SBT. Table A highlights the product types based on whether it is obtained principally from the fillet (green) or from other parts of the SBT (yellow). The simple descriptions provided in this table are used by the Secretariat and have not been agreed by Members.

Table B in Attachmment A shows that, in recent years, there has been relative consistency in the types of product codes reported by Members in descriptions on REEFs when using the 'OT' code. Since 2020, a total of 16 product type codes have been used to capture SBT reported as "OT', with twelve of these reported in four or more of these years. However, each year since 2020 there have been REEFs provided by Members where the description does not allow a specific product type code to be applied to the product being exported[10]. As noted earlier in the paper, there can be different reasons why a product type code may not be able to be applied by the Secretariat. The Secretariat would therefore welcome the Members review

[7] The CDS Resolution defines an over-utilised CMF as "where subsequent exports/re-exports of fish from the CMF have exceeded the original quantity of fish reported on the CMF".

[8] This was presented to Members in Background Paper #2 for the second meeting of the eCDS Working Group in 2021. This was part of a suite of proposed errors and warnings developed in response to Member requests maximise the data checking to be conducted by the eCDS at the time of data entry.

[9] In some cases, this may need to be an expected range, rather than a specific value, due to differences in processing and SBT.

[10] There has been a total of 261 REEFs since 2020 where the description has not allowed a specific product type code to be applied. However, this has improved from 85 REEFs in 2020, to 10 REEFs in 2025 (for 2025 data entered to date).

of these tables to ensure that all product descriptions required by Members are currently captured.

4. Conversion Factors

CCSBT utilises conversion factors to translate processed weights to whole fish weights. The importance of applying accurate conversion factors to support the effective management of SBT, and the challenges in applying global conversion factors, have long been understood. The Report of the Second Annual Meeting noted:

The report from the Scientific Committee noted that conversion factors for southern bluefin tuna may vary with the size of the fish, area and season. The Commission recognised that inappropriate conversion factors will influence the number of fish which may be taken within the quota. To effectively manage the southern bluefin resource the Commission should apply controls to accurately constrain removals.

There are significant challenges in defining agreed SBT conversion factors and consequently CCSBT currently applies Member specific conversion factors, where these are available. Where no Member specific conversion factors are available, default conversion factors are applied to all for the comparison of data received by the Secretariat (a table with all current CCSBT conversion factors is provided in **Attachment B** to this paper).

As noted earlier in the paper, the Secretariat currently uses the available conversion factors to reconcile SBT reported on CDS documents and identify potential issues for Member to follow up. These reconciliation processes are important to ensure that the CDS is effective in achieving its objective to track legitimate product flow. The available conversion factors can also be used to define the warnings in the eCDS, which will also enable the earlier identification of potential issues and support timely Member follow-up.

The already challenging process to define agreed conversion factors gets significantly more complex for many of the product types currently captured under the 'OT' product code[11]. This is due to the further processing that occurs to SBT to produce these product types, noting that many of the resulting products can also be dependent on the quality of the processed SBT and several different products may result from the same SBT. It is therefore recommended that, rather than trying to define specific conversion factors for each product type, consideration should be given to defining thresholds or levels of total meat expected to be recovered from SBT (these are sometimes referred to as recovery rates). These could then be used in the eCDS and Secretariat reconciliation to identify issues for Member follow-up.

As an example, a threshold could be set that outlines the maximum quantity of meat[12] that is expected to be recovered from an SBT (most likely described as a percentage). This could then be used in checks and reconciliations (eCDS and Secretariat) to ensure that the quantity of 'meat' exported on REEFs does not exceed what would be expected to be recovered from the quantity of SBT reported in preceding documents. So, if this threshold was set 80% for example, then if more than 80kg of meat was reported in REEFs that reference preceding documents that report 100kg of SBT (whole weight), this would result in a warning in the

[11] Defining a conversion factor for belly meat was identified as an issue requiring attention at the 5th meeting of the Scientific Committee in 2001 (see Paragraph 19) to support the SBT trade certification scheme, but no conversion factor has been able to be defined.

[12] Noting that the CDS Resolution requires that all landings, exports, imports, and re-exports of SBT 'meat' under the jurisdiction of a Member are accompanied by a CDS document and meat includes any meat separated from fish parts, such as heads, collars etc.

eCDS and could be reported to Members in Secretariat reporting. This warning in the eCDS would not prevent the completion of the CDS document and the trade of the SBT but would alert the validator and Member that further checks may be required to verify the accuracy of the quantities reported.

Alongside this, the Secretariat recommends that Members may also wish to consider assessing if more accurate default conversion factors can be defined for fillets and loins. This would improve the accuracy of the Secretariat's reconciliation processes and also minimise the number of unnecessary warnings that Members may receive in the eCDS. This work would benefit from further input and information from Members to inform any review Members agree to undertake.

5. Suggested Approach

Members noted at CC20 that the effort that may be required to undertake this work should be balanced against the value that would be obtained from it. Recognising this, and the challenges associated with defining agreed conversion factors for these product types, the Secretariat recommends taking a more simplified approach. It is recommended that the approach focus on two main elements:

- Identify specific product types to replace those products currently captured under the 'OT' product code and develop agreed definitions for these product types to support Member implementation.
- Using information from Members to assess the accuracy of the current default conversion factor for fillets and loins (both 2.5) and consider the practicability of developing thresholds for the quantity (ratio or percentage) of meat that can be recovered from SBT to support CDS checks and reconciliation, including the development of warnings/errors in the eCDS.

The Secretariat recommends the following approach to address these issues for TCWG consideration:

- The Secretariat work intersessionally with interested Members to:
    - Produce an agreed list of the product types that will be used in the eCDS to replace the OT product type. It is recommended that this also includes agreed definitions for these product types to support consistent Member implementation.
        - It is recommended that the product type codes are based on those that have been used by Members since 2020 (**Table B in Attachment A**).
        - It is recommended that the initial approach focus on supporting eCDS implementation. So, rather than adding agreed definitions to the CDS Resolution, it is recommended that these definitions be included only in resources developed to support eCDS use initially. Members may then wish to reassess the inclusion of these product types and definitions in the CDS Resolution at a later stage following eCDS implementation.
    - Assess and update, if necessary, the default conversion factors for SBT fillets and loins.
    - If practical, develop thresholds that identify the maximum quantity or percentage of 'meat' that is expected to be recovered from SBT.
        - These updated default conversion factors and meat recovery threshold would not be binding on Members but would be used to inform the Secretariat's CDS reconciliation and warnings/errors developed in the eCDS to identify issues for potential Member follow up.

- The results of this intersessional work, including any updated definitions, conversion factors or thresholds (if agreed) would then be presented to CC21.

6. Summary

The Secretariat invites Members to:

- Consider the current issues discussed in this paper related to the use of the 'OT' product type code and CDS checks and reconciliation;
- Discuss any concerns, or additional information that Members may have to support resolving these issues; and
- Consider endorsing the approach recommended by the Secretariat and identifying interested Members to participate in the intersessional process.

Prepared by the Secretariat

Attachment A

Table A: Count of Product Types and Total Weights Reported on CMFs and REEFs

Reference	Code	Name	Description	Count of REEFs that have used this code	Count of CMFs that have used this code	Sum of Reported Re-export Weight (kg)	Sum of Reported CMF Weight (kg)
Current	DRO	Dressed - Tail on	Processed with gills, gut, operculae (gill plates/covers) and head removed. Dorsal, pelvic and anal fins may or may not be removed.	72	3319	53,807.94	882,455.69
Current	DRT	Dressed - Tail off	Processed with gills, gut, operculae (gill plates/covers), head and tail removed. Dorsal, pelvic and anal fins may or may not be removed.	24	1750	362,388.25	1,608,696.83
Current	FL	Fillet	Processed further than DRT, with the trunk cut into fillets.	1135	180	1,390,857.49	17,036.94
Current	GGO	Gilled and Gutted - Tail on	Processed with gills and gut removed. Operculae (gill plates/covers) and dorsal, pelvic and anal fins may or may not be removed.	469	25653	593,867.98	96,396,587.27
Current	GGT	Gilled and Gutted - Tail off	Processed with gills, gut and tail removed. Operculae (gill plates/covers) and dorsal, pelvic and anal fins may or may not be removed.	623	15783	3,332,018.94	117,106,832.90
Current	RD	Round	SBT Without any processing.		378		72,468.69
OT	BLO	Block	Block	1171	1	383,128.23	7.00
OT	BM	Belly Meat	Belly Meat	530	6	500,593.95	156.90
OT	CHK	Cheek	Cheek meat	149		59,151.70	
OT	CHN	Chin meat	Chin meat - meat around the bottom part of the collar	18		7,414.90	
OT	CUB	Cube	Tuna meet diced into cubes	45		27,908.91	
OT	EYE	Eye meat	Eye meat	6		68.80	
OT	HAR	Haramo	Similar to Toro	23		15,449.69	
OT	HED	Head meat	Head meat - meat around the forehead/top of the head	22		4,313.00	
OT	HOH	Hoho(niku) - Cheek Meat	Cheek Meat	8		860.00	
OT	HT	Heads and Tails	This is a by-product not included in weight calculations.	3		113.10	

OT	KAM	Kama	Collar meat	1336		1,233,528.13	
OT	KAW	Kawara	Horizontally cut block	6		1,259.60	
OT	KIR	Kiriotoshi	Leftover pieces; this includes rib meat, cheek meat, head meat, etc. It is a byproduct of fillets and not included in weight calculations.	44		21,669.70	
OT	LOI	Loins	Fillets cut in half	788	509	567,537.07	40,314.23
OT	NAK	Nakaochi	Ribs and backbone with the rib meat in place	83		47,650.62	
OT	NEG	Negitoro genryo	Minced tuna meat	365		161,306.84	
OT	NOD	Nodo	Meat at the bottom of the head, connecting both side gill covers	1		400.00	
OT	PEC	Pectoral fin	Pectoral fin	2		5.80	
OT	SAK	Saku	Saku, akami saku, steaks	1949		2,312,678.19	
OT	SLC	Slice / Sashimi	Sliced "saku" (general)	13		4,531.43	
OT	SMK	Smoked pieces	Smoked pieces	1		30.15	
OT	SUS	Sushi-neta	Sliced "Saku" product (used for sushi)	53		20,850.03	
OT	TR	Toro	Fillets of fat (the most expensive part of the tuna)	412	2	238,115.55	33.00
Current	OT	Other[13]	None of the above codes are appropriate	532	171	447,329.15	76,368.91

= Product produced principally from fillets
= Product from other parts of the SBT

[13] "Other" in this table indicates that no further product description was provided on the CDS document, or that the description provided could not be matched to any available product types.

Table B: Product Types Reported on REEFs 2020 – 2025

Processed Code	Brief Description	2020	2021	2022	2023	2024	2025[14]
BLO	Block	✓	✓	✓	✓	✓	✓
BM	Belly Meat	✓	✓	✓	✓	✓	✓
CHK	Cheek	✓	✓	✓	✓		
CHN	Chin Meat		✓		✓		
CUB	Cubes	✓		✓	✓		✓
DRO	Dressed - Tail on	✓	✓	✓	✓	✓	✓
DRT	Dressed - Tail off	✓	✓	✓	✓	✓	
EYE	Eye Meat				✓		
FL	Fillet	✓	✓	✓	✓	✓	✓
GGO	Gilled and Gutted - Tail on	✓	✓	✓	✓	✓	✓
GGT	Gilled and Gutted - Tail off	✓	✓	✓	✓	✓	✓
HED	Head meat	✓		✓			
KAM	Kama	✓	✓	✓	✓	✓	✓
KIR	Kiriotoshi				✓	✓	
LOI	Loins	✓	✓	✓	✓	✓	✓
NAK	Nakaochi	✓	✓	✓	✓	✓	
NEG	Negitoro genryo	✓	✓	✓	✓	✓	✓
OT	Other	✓	✓	✓	✓	✓	✓
SAK	Saku	✓	✓	✓	✓	✓	✓
SLC	Slices	✓	✓		✓		✓
TR	Toro	✓	✓	✓	✓	✓	✓
Total No. of OT Product Type Codes Used on REEFs Each Year		**13**	**12**	**12**	**15**	**10**	**10**

= OT Product Code

[14] 2025 data only includes forms received and entered up to 19 January 2026.

Attachment B

Current CCSBT Conversion Factors

Flag (or default if no flag)	Processed State	Description	Conversion Factor	Additional kg per fish
AU	GG	Gutted, gill plate and tail not removed (used up to the end of the 2012/13 season or 2012 calendar year)	1.12	1
AU	GGO	Gill plates are not removed, tail not wholly removed	1.12	1
AU	GGH, GGT	Gutted, gill plates are removed, tail is wholly removed	1.176	0
AU	DRT	Dressed - Tail off (used from 14/09/20 onwards)	1.27	0
JP, KR, NZ, TW	GG	Gilled and Gutted (used up to the end of the 2012/13 season or 2012 calendar year)	1.15	0
JP	BM	Belly meat	2.5	0
JP	HAR	Haramo	2.5	0
NZ	GGT	Gilled and Gutted, with Tail Removed	1.15	0
NZ, ZA	GGH	Gilled and Gutted, with Head Removed	1.5	0
ID, JP	KAM	Collar meat	2.5	0
NZ	RD	Round (Whole Fish)	1	0
ZA	DRO	Dressed - Tail on	1.28	0
Default	BLO	Block	0	0
Default	CHK	Cheek	0	0
Default	DR	Dressed (used up to the end of the 2012/13 season or 2012 calendar year)	1.8	0
Default	DRO	Dressed - Tail on	1.8	0
Default	DRT	Dressed - Tail off	1.8	0
Default	FL	Fillets	2.5	0
Default	GG	Gilled and Gutted	1.15	0
Default	GGO	Gilled and Gutted - Tail on	1.15	0
Default	GGT	Gilled and Gutted - Tail off	1.15	0
Default	HED	Head meat - meat around the forehead/top of the head	0	0
Default	HT	Heads and Tails	0	0
Default	LOI	Loins (Fillets cut in half)	2.5	0
Default	OT	Other (not specified)	1.15	0
Default	RD	Round (Whole Fish)	1	0