

CCSBT-CC/1910/10

Potential Non-Member Fishing Activity & Trade/ Emerging Markets

1. Introduction

This paper provides:

- China's response regarding the Ping Tai Rong Fleet activities in 2018;
- A note about the Secretariat's contingency fund with Trygg Mat Tracking;
- A summary of the Secretariat's research into alternative sources of trade data to the Global Trade Atlas (GTA);
- A summary of relevant correspondence about trade with Non-Cooperating Non-Members (NCNMs); and
- A brief summary of SBT trade information between 2016 and 2018 based on the United Nations (UN) COMTRADE database.

2. Potential Non-Member Fishing Activity

Chinese Flagged Vessels in the Southern Indian Ocean

In July 2018, the Indian Ocean Tuna Commission (IOTC) Secretariat advised the CCSBT Secretariat that an observer alleged SBT were being transhipped to the Chinese-flagged Carrier Vessel Ping Tai Rong Leng2 (PTRLeng2) by seven Chinese-flagged Ping Tai Rong (PTR) fleet longliners. Based on the observer's deployment report, the IOTC wrote a letter to its Chinese Commissioner (refer to **Attachment A** – letter dated 1 September 2018, in copy to CCSBT).

This letter was received by China before PTRLeng2 arrived into its home port in Zhoushan where it was expected to unload. It reiterated the observer's allegations that multiple transhipments of southern bluefin tuna incorrectly labelled as yellowfin tuna had occurred from a number of PTR longliners. In total the observer estimated there were a minimum of 180 SBT present in the last five transhipments received by PTRLeng2

Follow-up by CCSBT

Immediately upon receipt of the IOTC's letter (detailing the transhipment observer's findings), the CCSBT Secretariat followed up with its own letter to the IOTC's Chinese Commissioner which is provided at **Attachment B**.

China provided a brief email response to the CCSBT's letter noting that,

".... internal investigation both on the fishing vessels and carrier vessel, as well as the vessel owner/the fishing company, would initiate as the carrier vessel calls Chinese port" and, "we will come back to the IOTC and CCSBT with the outcome of the investigation and the actions against the vessel owner when all necessary procedures are finished by this side."

The above information was reported to the October 2018 meetings of the Compliance Committee (CC) and Extended Commission (EC).

Response from China

China did not respond to the CCSBT on this matter but did provide a response to IOTC's Executive Secretary dated 8 March 2019. That response is provided at **Attachment C**. In China's letter to IOTC, China notes it carried out an investigation of the PTRLeng2 on 06/09/18 in Zhoushan and called all seven of the PTR longliners concerned back to port for further investigation. The longliners did not arrive in Zhoushan until 7 and 8 October 2019. China reported that the resulting investigation indicated that, "no bluefin tuna was found during the investigation", and, "there is no evidence indicating that Ping Tai Rong Leng 2 has conducted illegal transhipment at sea of the southern bluefin tuna".

3. Contingency Fund with Trygg Mat Tracking (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 as a follow-up to reports that may be provided to the Secretariat on suspicious fishing activity in SBT fishing grounds during 2019. An agreement for these services was signed on 1 February 2019 and an initial payment of \$9,969 (US \$7000) was made to TMT to be held in an operating fund pending CCSBT analysis requests. The Secretariat advises that to date it has not requested any ad-hoc analyses to be conducted by TMT during 2019, and therefore the operating fund has not yet been utilised.

4. Trade and Emerging Markets

4.1. Background

The EC of CCSBT 25 requested the Secretariat investigate alternative sources of trade data statistics because some Members were concerned as to whether the Global Trade Atlas (GTA) could be considered an official information source.

In addition, the 13th meeting of the Compliance Committee (CC13) requested that the Secretariat contact Lebanon and Jordan to advise that CDS documents should accompany SBT imports. CC13 also requested that Members and Non-Members investigate likely errors in the Global Trade Atlas relevant to them and report back, more specifically:

- Australia, the EU and the USA indicated that they would investigate the issues relevant to them and report back;
- The EU was to investigate an apparent export of 18t of SBT from Spain to Italy, reported in the GTA database and advise the Secretariat; and
- Indonesia noted the under-representation of its SBT exports in the GTA database compared to CDS figures and was to contact the relevant Indonesian authorities to resolve the under-representation of Indonesia SBT exports in the GTA database compared to CDS figures.

The EU provided a response concerning its trade data on 25 January 2019 and this was communicated to all Members in CCSBT Circular #2019/006 (extract at **Attachment D**).

4.2 Communications with Non-Cooperating Non-Members (NCNMs)

During 2019 the Secretariat has made contact with various NCNMs concerning trade and CDS queries.

Canada

The Secretariat has established contact with relevant officials at Fisheries and Oceans, Canada and is still progressing queries regarding reported SBT imports into Canada.

Lebanon and Jordan

CC13 tasked the Secretariat with contacting Lebanon and Jordan to advise that CCSBT's CDS documents should accompany any imports of SBT. The Secretariat tried to contact both Lebanon and Jordan in April and May 2019.

The Secretariat successfully conveyed some initial information about the CDS to Lebanon and received an acknowledgement in due course. As suggested by a Lebanese official, the Executive Secretary then wrote an official letter to Lebanon (**Attachment E**) requesting that it consider:

- not accepting imports of SBT product into Lebanon if unaccompanied by appropriate CDS documentation, and
- voluntarily sharing with the CCSBT any CDS documents received as well as SBT trade information.

No official acknowledgement or response has been received to this letter and the Secretariat's contact in Lebanon¹ has suggested that the Secretariat follow up with a second letter.

It was difficult to identify a relevant contact in Jordan and four email communications about CCSBT's CDS to a listed United Nations Food and Agriculture Organisation (UN FAO) representative to Jordan were not acknowledged. Therefore, the Secretariat cannot confirm whether information concerning CCSBT's CDS was received by Jordan.

Mauritius

Last year's summary of trade (refer to paper CCSBT–CC/1810/20) indicated that in 2016 and 2017 Mauritius had imported 1.61t and 2.02t of SBT from China respectively. The Secretariat contacted Mauritius and it advised that, "....no such imports are found in our records. It could probably be an error in misreporting or typing of HS Code."

Namibia

During May 2019 Namibia made initial contact with the CCSBT Secretariat noting that: "One of our vessels is fishing in the southern atmosphere and they are piking up some Bluefin tuna. I want to find out what are the procedures for us to export these Bluefin tuna." Namibia has subsequently confirmed that:

"Our vessels have not landed any Bluefin species yet. I will still discuss our membership in the future with our management and will follow the application procedures as outlined by you if approved by management."

On contacting ICCAT about Namibia, ICCAT confirmed that Namibia has declared catches of SBT to it for 3 separate years: 1t (2005), 13t (2014) and 17t (2016).

4.3 New Source of Trade Statistics (UN COMTRADE)

The Secretariat conducted a search for sources of trade data other than the Global Trade Atlas (GTA) and concluded that the UN COMTRADE database may potentially be an alternative and cost-effective² option from which to source data for preparing future trade summaries.

The Secretariat checked the trade figures reported by the GTA database versus the COMTRADE database for the period 2015 to 2017 inclusive. As at January 2019, the total trade by product and Member were quite similar between the two databases. Out of a total of 231 tonnage values compared between the GTA and COMTRADE databases, 93% were the same, 3.5% differed by between 2t to 20t, and 3.5% differed by 20t or greater.

¹ An official at the Department of Fisheries and Wildlife, Ministry of Agriculture, Lebanon

² No subscription/payments are required to access UN COMTRADE data

The Secretariat also checked COMTRADE's data sources for each of CCSBT's Members as well as for some common Non-Cooperating Non-Member (NCNM) trading partners. A table of COMTRADE listed data sources is provided at **Attachment F.** To the best of the Secretariat's understanding, all data are derived from official sources.

Based on these findings, the Secretariat concluded that the UN COMTRADE database would be a suitable alternative source of trade data to replace the GTA. Therefore, the Secretariat did not renew its annual GTA subscription in January 2019³.

4.4 Summary of Trade Data from UN COMTRADE

The Secretariat has examined its CDS data as well as trade data from the UN COMTRADE database. In the CDS database and also in the EU's annual reports to the Compliance Committee and Extended Commission, only small imports of less than 0.1 tonnes are recorded as occurring between 2016 and 2018.

A summary of COMTRADE database information for SBT for the period 2016 to 2018 is provided at **Attachment G**. This summary does not include reported trade of live SBT as it has in previous years because the Secretariat has assumed that any recorded trade in live SBT is due to miscoding.

COMTRADE: Exports and Re-exports

Refer to Attachment G: Tables 1a-c

- Australia's total SBT exports for 2018 are recorded as 14,138.9t (for fresh/chilled and frozen SBT combined) in COMTRADE, which is quite a lot higher than reported in the CDS (9,371.8t) for 2018 refer to paper CCSBT-CC/1910/04: Attachment C, Tables (C)i) and ii).
- Indonesia's SBT exports are well under-represented in all 3 years of the COMTRADE export statistics COMTRADE records only 11t, 16t and 0.3t of total exports (fresh and frozen SBT combined) for 2016, 2017, and 2018 respectively.
- South Africa's exports are also well under-represented on the COMTRADE database
 COMTRADE records only 2.5t, 31.8t and 42.6t of total exports (fresh and frozen SBT combined) for 2016, 2017, and 2018 respectively.
- The USA is recorded as having large exports of fresh/chilled SBT 127.5t, 97.9t and 141.6t for 2016, 2017 and 2018 respectively. Due to the product being recorded as fresh SBT, this seems likely to be due to miscoding.
- For 2016 to 2018, the COMTRADE statistics record that small quantities of SBT were traded by EU Members, with a large export figure (376.5t⁴) recorded for 2016. These figures seem to indicate that species miscoding by EU Member States is continuing to occur.
- There are some medium to large SBT export figures unexpectedly recorded for Algeria, Iran, Oman and Sri Lanka (for Oman there is an import, export and re-export figure of 33t of fresh/chilled SBT recorded for 2017).

COMTRADE: Imports

Refer to Attachment G: Tables 2a and b

• For 2016 to 2018, COMTRADE statistics record that quantities of SBT were traded by EU Members, again appearing to indicate that species miscoding by EU Member States is continuing to occur.

³ This resulted in a saving of USD \$3,753.62

⁴ 375.1t of the 376.5t recorded for the Netherlands

- COMTRADE records Mauritius as having imported 1.6t and 2.0t of frozen SBT from China in 2016 and 2017 respectively, and this same information is reflected on the Mauritius Chamber of Commerce and Industry website. The Secretariat contacted Mauritius to confirm if this imported product was correctly coded as SBT and Mauritius advised that this product was not SBT and had likely been miscoded.
- There are some medium to large SBT import figures unexpectedly recorded for Cote d'Ivoire, Ghana, Malaysia, Oman (the 33t of fresh SBT imported into Oman in 2017 matches the 33t export and re-export figures of 33t recorded for Oman in Tables 1a and 1b), Thailand and the United Arab Emirates.

5. Recommendations

It is recommended that CC14:

• Notes the information presented in this paper.

Prepared by the Secretariat



1 September 2018

IOTC Ref: 7004

Mr Wan Chen **IOTC Head of Delegation** Division of Deep Sea Fishing CHINA

wan.chen@live.com

REQUEST FOR URGENT ACTION REGARDING ALLEDGED ILLEGAL FISHING ACTIVITIES BY VESSELS REGISTERED TO THE PEOPLES REPUBLIC OF CHINA.

The Indian Ocean Tuna Commission is the intergovernmental organization responsible for the management of tuna and tuna-like species in the Indian Ocean. The Peoples Republic of China joined the Commission (acceded to the IOTC Agreement) in October 1998.

In 2006, IOTC adopted a management measure (Resolution 06/02) to establish a programme for transhipment by large-scale fishing vessels responding to the need to combat illegal, unregulated and unreported (IUU) fishing activities by focusing on transhipped tuna. This management measure, which came into effect in 2009, gave the Commission the mandate to deploy observers to monitor the transhipment activities by large-scale longline vessels in the IOTC Area of competence. This measure was last updated in 2017 as per Resolution 17/06.

In accordance with Resolution 17/06, the IOTC Secretariat implements a Regional Observer Programme (ROP). Furthermore, it does this in close collaboration with the Commission for the Conservation of Southern Bluefin Tuna (CCSBT)

I am writing to alert you to a report the IOTC Secretariat has received from the ROP regarding possible illegal activities by six Chinese-flagged vessels.

In early July, IOTC received information from CCSBT that a number of Chinese longliners were operating in an area where southern bluefin tuna is prevalent and there was a strong possibility that the vessels were targeting southern bluefin tuna or taking southern bluefin tuna as bycatch. This information was conveyed to the ROP Consortium with the specific request for the observer aboard the carrier vessel PING TAI RONG LENG No. 2 (PTR2), which was receiving transhipments from these fishing vessels, to be on the lookout for possible transhipments of southern bluefin tuna being reported as another tuna species.

In late July, the observer aboard the PTR2 informed the ROP that he was observing the transhipment of what appeared to be southern bluefin tuna incorrectly labelled as yellowfin tuna.

The fishing vessels involved were: Ping Tai Rong 316, Ping Tai Rong 70, Ping Tai Rong 318, Ping Tai Rong 71, Ping Tai Rong 65 and Ping Tai Rong 68. Furthermore, the observer provided the following information of the minimum numbers of fish he believed to be southern bluefin tuna (not yellowfin tuna) during last five transhipments

If the observer is correct, and yellowfin tuna is being misrepresented in the official transhipment declaration forms, this amounts to serious mis-reporting under IOTC Resolution 17/06. Notwithstanding the misreporting of yellowfin (a species which is considered to be overfished in the IOTC Area), the potential impact on southern bluefin tuna, which is also in a highly depleted state, is of major concern to CCSBT.

Fishing vessel	SBT
Ping Tai Rong 70	35
Ping Tai Rong 68	32
Ping Tai Rong 318	57
Ping Tai Rong 316	25
Ping Tai Rong 303	31

Paragraph 25 of IOTC Resolution 17/06 states the following:

The IOTC Secretariat shall, when providing CPCs with copies of all raw data, summaries and reports in accordance with paragraph 10 of Annex III to this Resolution, also indicate evidence indicating possible infraction of IOTC regulations by LSTLVs/carrier vessels flagged to that CPC. Upon receiving such evidence, each CPC shall investigate the cases and report the results of the investigation back to the IOTC Secretariat three months prior to the IOTC Compliance Committee meeting. The IOTC Secretariat shall circulate among CPCs the list of names and flags of the LSTLVs/Carrier vessels that were involved in such possible infractions as well as the response of the flag CPCs 80 days prior to the IOTC Compliance Committee meeting.

In accordance with paragraph 25, China is required to investigate the aforementioned case and report back to the IOTC Secretariat.

Your urgent attention to this matter is vital. The carrier vessel PING TAI RONG LENG No. 2 is expected to arrive in the port of Zhongshan, China on or before 5 September 2018, and offload its tuna.

I would be grateful if you can acknowledge this request for action, and given the seriousness of the matter, I seek your permission to release the ROP Deployment Report to the Executive Secretary of CCSBT.

Finally, the IOTC Secretariat stands by to provide any further assistance or information you might need in your investigation; and I look forward to receiving the results of your investigation in the near future.

Yours sincerely

Christopher O'Brien Executive Secretary

Cc:

Ms Zhao Liling (bofdwf@gmail.com)
Ms Jl Zhiyuan (ji_zhiyuan@mfa.gov.cn)
Mr Zhao Gang (admin1@tuna.org.cn)
Executive Secretary CCSBT (rkennedy@ccsbt.org)

Commission for the Conservation of Southern Bluefin Tuna



みなみまぐろ保存委員会

Mr Wan Chen
IOTC Head of Delegation
Division of Deep Sea Fishing
CHINA
wan.chen@live.com

4 September 2018

Dear Mr. Wan Chen,

FOLLOW-UP TO THE IOTC'S LETTER REGARDING ALLEGED ILLEGAL FISHING ACTIVITIES BY VESSELS REGISTERED TO THE PEOPLE'S REPUBLIC OF CHINA

I present my compliments to you on behalf of the Commission for the Conservation of Southern Bluefin Tuna (CCSBT). The CCSBT is the intergovernmental organisation responsible for the management of Southern Bluefin Tuna (SBT) throughout its distribution.

The CCSBT has received a copy of a letter dated 1 September 2018 to yourself from Christopher O'Brien, Executive Secretary of the Indian Ocean Tuna Commission (IOTC) concerning alleged illegal fishing activities by six fishing vessels registered to the People's Republic of China. I wish to follow-up with you urgently regarding this matter.

As noted in the IOTC's letter, in early July the CCSBT Secretariat shared information with the IOTC Secretariat that a number of Chinese longliners were operating in the same area that CCSBT-authorised fishing vessels were known to be catching SBT, and that there was therefore a strong likelihood that those Chinese longliners were also catching SBT.

The IOTC Secretariat then conveyed this information to its transhipment Regional Observer Program (ROP) Consortium with a specific request that the observer aboard the Chinese-flagged carrier vessel PING TAI RONG LENG No. 2, which was receiving transhipments from these fishing vessels, check for any possible transhipments that included SBT.

In its letter, the IOTC also advised you that the observer aboard the Carrier Vessel PING TAI RONG LENG No. 2 subsequently noted that he was observing the transhipment of what appeared to be SBT incorrectly labelled as yellowfin tuna, and that the six Chinese fishing vessels involved in these transhipments were: Ping Tai Rong 65 and Ping Tai Rong 68, Ping Tai Rong 70, Ping Tai Rong 71, Ping Tai Rong 316 and Ping Tai Rong 318.

These vessels are not listed on CCSBT Record of Authorised Vessels. If these observations are correct, and that southern bluefin tuna were caught, retained and transhipped by these vessels, then this will be considered by the CCSBT to be illegal fishing and transhipment of SBT as the vessels involved have not been authorised to catch, carry or tranship SBT.

I request that China investigate this matter urgently. Prompt action is important because the carrier vessel PING TAI RONG LENG No. 2 is expected to arrive in the port of Zhongshan, China on or before 5 September 2018.

Furthermore, I request that the offloaded tuna be inspected and identified. If there is any uncertainty in the identity of tuna suspected of being SBT, I suggest that tissue samples be obtained and frozen for DNA analysis. The CCSBT Secretariat stands ready to provide assistance with respect to collecting tissue samples and conducting DNA species identification of the samples.

I would also like to take this opportunity to refer to a letter from the Chair of CCSBT's Extended Commission dated 7 December 2017 (attached) relating to IUU fishing involving SBT by other Chinese vessels that China took action against. This letter sought cooperation from China to ensure ongoing requisite control of its vessels, such as by continuing to prohibit Chinese vessels from participating in fishing activities involving SBT until China has established a cooperative arrangement with the CCSBT.

In addition, I would again like to extend an invitation to China to attend the CCSBT's upcoming annual meetings in October 2018 and to consider becoming a Member or CNM of the CCSBT.

I would be grateful if you could acknowledge receipt of this letter. I would also like to request that China copy me into any further correspondence in relation to this matter, including the results of any sampling and/or investigations that are undertaken.

I look forward to hearing from you in the near future.

Yours sincerely,

Robert Kennedy **Executive Secretary**

Cc:

Ms Zhao Liling (bofdwf@gmail.com)

Ms JI Zhiyuan (ji zhiyuan@mfa.gov.cn) Mr Zhao Gang (admin1@tuna.org.cn)

Executive Secretary IOTC (IOTC-Secretariat@fao.org)

<u>LSTLVs – Several (Deploy 497)</u> Received 11/03/2019 from LIU Liming

SEYCHELLES

Participating Fleet CHINA

<u>Possible</u> • Possible transhipment of SBT infraction:

Dr. Christopher O'Brien Executive Secretary Indian Ocean Tuna Commission

March 8, 2019

Subject: Outcome of the Investigation on Suspected Illegal Operation of Ping Tai Rong Company

Dear Dr. Christopher O'Brien,

Reference is made to your letter of Sept 1, 2018 (IOTC Ref: 7004) and IOTC Observer Report (497-18) on the suspected illegal operation of tuna longliners, namely Ping Tai Rong 65/68/70/71/303/316/318, and carrier vessel, Ping Tai Rong Leng 2, whose owner is Ping Tai Rong Deep Sea Fishing Group Co., LTD.

After receiving the letter and the Report, the Bureau of Fisheries (BOF) of Ministry of Agriculture and Rural Affairs of China immediately notified Zhejiang Provincial Bureau of Ocean and Fisheries (hereafter referred to as "the Zhejiang Bureau") to investigate on the case. The Zhejiang Bureau, after receiving the notification, attached great attention to this matter and took immediate action.

According to the requirement of the notification by BOF, the Zhejiang Bureau established an investigation team, which consists of the responsible office of the Bureau, the provincial law-enforcement unit, the Zhoushan Bureau of Ocean and Fisheries, Research Center of International Laws and Affaire for Distant water Fisheries of Shanghai Ocean University (hereafter referred to as "the Research Center") and the Marine Fisheries Research Institute of Zhejiang Province, to investigate on the suspected illegal catch of southern bluefin tuna of the seven longliners, the transshipment of the suspected bluefin tuna catch from the longliners to the Carrier Vessel Ping Tai Rong Leng 2, as well as other suspected illegal matters made by the above mentioned seven longliners.

I wish to advise that the investigation report indicated that no bluefin tuna was found during the investigation. The following refers to the investigation method and process.

1. Investigation Process

After receiving the notification from the BOF on September 3, the Zhejiang Bureau immediately instructed the Carrier Vessel Ping Tai Rong Leng 2, which is on the way heading for China, not to call any port, not to make transshipment with any other vessel before docking pier at the wharf of Zhoushan National Distant Water Fisheries Base (NDWF Base). At the same time, the Zhejiang Bureau invited the Research Center of Shanghai Ocean University to appoint experts to Zhoushan to assist the Bureau to conduct catch port inspection and fish species identification on the catch on board the carrier vessel Ping Tai Rong Leng 2, who docked pier at the wharf of NDWF Base on the afternoon of September 5.

On the morning of September 6, the investigation team entered to the site. In the afternoon, the relevant leaders of Zhejiang Bureau convened a special meeting on "port inspection and fish species identification for catch transshipped to Ping Tai Rong Leng 2" to discuss the implementation of this inspection. At the meeting, the catch inspection team introduced the preliminary plan of catch inspection and further improved the work plan after hearing the opinions of the meeting participants. At the same time, researchers from Zhejiang Marine Fisheries Research Institute are invited to join the catch inspection work during the whole inspection process. The meeting tasked team member from Zhejiang Bureau to check the logbook, navigation equipment and layout of the catch holding, and those from the Research Center to examine the catch and species identification, and the Zhejiang Marine Fisheries Research Institute to arrange researchers for participation the whole the investigation.

At 3:30 p.m. of September 6, the investigation team boarded the Carrier Vessel Ping Tai Rong Leng 2 and questioned the master, chief mate and crew, checked the log book, electronic navigation record, and observer's transshipment report and customs declaration list. The team also checked and verifies the integrity of the fish in the hold.

Carrier Vessel Ping Tai Rong Leng 2 started to unload the fish (the first string bag) at 4:48 PM on September 6 and finished the unloading of all the catch at 10:00 PM on September 13. A total of 1602.8 tons of catch has been discharged during the 8 days, which is consistent with the customs data.

The entire unloading process was carried out under the supervision of the investigation team. The team member from Shanghai Ocean University took photos and randomly collected samples for each string bag of fish in the unloading process.

2. Catch Inspection and Species Identification Scheme

During the unloading, the catch inspection team should participate in the whole
process, including fish sampling and unloading supervision, photo-taking of each
string fish, recorded the whole process of fish unloading and the discharge order
of catch transshipped from related fishing vessel in detail.

- 2) The catch was examined by random sampling from 5% to 10% and preliminary identification of specie was made. The length data (head length or trunk length) of the sample individuals were measured and muscle tissue samples were taken from some individuals.
- After completing the unloading of the catch, the catch inspection team should check whether all the catch has been unloaded completely.
- 4) DNA testing of muscle tissue was performed on individuals sampled at the site if the species could not be preliminarily identified. The process includes tissue processing in the relevant laboratory in Research Center, extraction of genomic DNA and PCR amplification of conventional gene COI. The Research Center conducted analysis of the sequencing results to determine the species of the samples.

3. Outcome of the Investigation

 Inspection of log book and electronic navigation records of Ping Tai Rong Leng 2.

The log book of Ping Tai Rong Leng 2 shows that the Vessel left Singapore for Zhoushan on August 29 and arrived at the wharf of Zhoushan NDWF Base on the afternoon of September 5. During the voyage, the carrier vessel did not call at any other port or alongside to other ships.

Inspection of the catch layout integrity inside the hold of Ping Tai Rong Leng
 2.

According to the cargo space arrangement plan provided by The Ping Tai Rong Leng 2, the vessel has 4 freezing holds. The loading arrangement of the catch is as follows:

Hold No.4: 662.53 tons of ultra low temperature catch (bigeye tuna, yellowfin tuna, oil fish and a small quantity of swordfish);

Hold No.3: 511.7 tons of albacore tuna;

Hold No.2: 137.26 tons of albacore tuna;

Hold No.1: 269.43 tons of mixed fish (moonfish, butterfly mackerel (Gasterochisma melampus), dolphin-fish (Coryphaenidae), wahoo (Acanthocybium solandri), black marlin (Makaira indica).

By comparison with the customs declaration list and the catch space arrangement, all the catch inside the holds have been neatly arranged and well classified, so that the possibility of transshipment and/or discarding on the way back can be

ruled out.

3) A total of 604 samples of length data were randomly sampled. For the fish without head and tail, which could not be identified in morphology, important samplings were conducted and muscle samples collected (253 in total). Only a small number of samples were taken for mixed fish and albacore tuna with the morphological characteristics. The entire unloading process is conducted in orderly and normal way.

4) Results of DNA testing

For the 253 muscle samples collected, most of them could identify the species after morphological identification through photo comparison. However, there were still 46 samples without head and tail that could not be identified and therefore needed DNA testing. Genomic DNA was extracted from each sample and checked by electrophoresis. Conventional COI DNA Barcoding Cocktail PCR and sequencing analysis were carried out for all 46 samples. The sequencing results were blasted on NCBI. The 46 samples were identified by DNA testing basically covered all the samples without head and tail. And the testing indicates that no southern bluefin tuna (*Thunnus maccoyii*) was found (38 of which were determined yellowfin tuna *Thunnus albacares* and 8 of them bigeye tuna *Thunnus obesus*).

4. Conclusion and comments

According to the information available at the present, there is no evidence indicating that Ping Tai Rong Leng 2 has conducted illegal transshipment at sea of the southern bluefin tuna.

5. Other matters

1) All the seven LL vessels suspected to have transshipped bluefin tuna to Carrier Vessel Ping Tai Rong Leng 2, according to the Observer Report (497-18), were called back for further investigation by the BOF soon after the receipt of the letter of September 1, 2018 from the Executive Secretary. The vessels arrived at the wharf of Zhoushan NDWF Base on October 7 and October 8 respectively. Internal investigation on the vessels against bluefin tuna indicated no evidence on the alleged violation.

In addition, on her way back to China, FV Ping Tai Rong 316 was inspected by an Indonesian patrol boat (BC 3005) near in area near to Singapore at 8:00 on the morning of September 23, 2018, and no violation was found during the inspection.

 The outcome of investigation on other matters indicated in the Observer Report (497-18), such as vessel marking, VMS and logbook, have been submitted separately to Secretariat on March 5, 2019.

I wish to take this opportunity to assure to the Commission that China bears no tolerance on violation of domestic and international laws and regulations on deepsea fishing, and serious punishment would be imposed on vessel owners if their vessel(s) have been indentified to have engaged in illegal fishing.

Hope the information above could clarify the situation.

Should you have any questions, please do not hesitate to let me know.

Kind regards,

ZHAO Liling

Director

Division of Deepsea Fishing

Bureau of Fisheries

Ministry of Agriculture and Rural Affairs

People's Republic of China

Attachment:

- DNA Test Report
- Navigation Chart of FV Ping Tai Rong 65/68/70/71/303/316/318 and CV Ping Tai Rong Leng 2
- 3. Customs Clearance Declaration

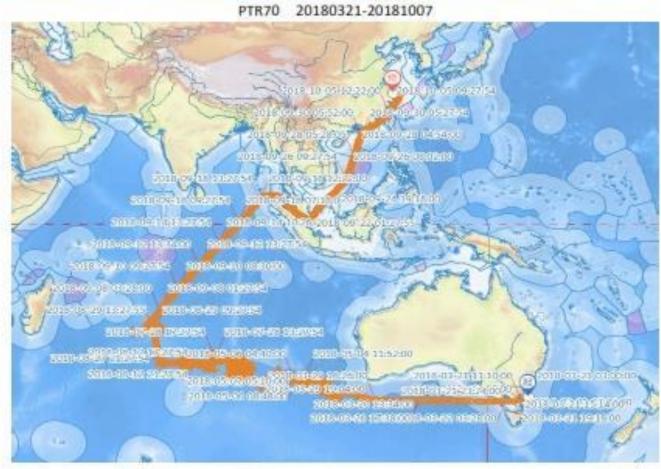


PTR65 20170920-20181007

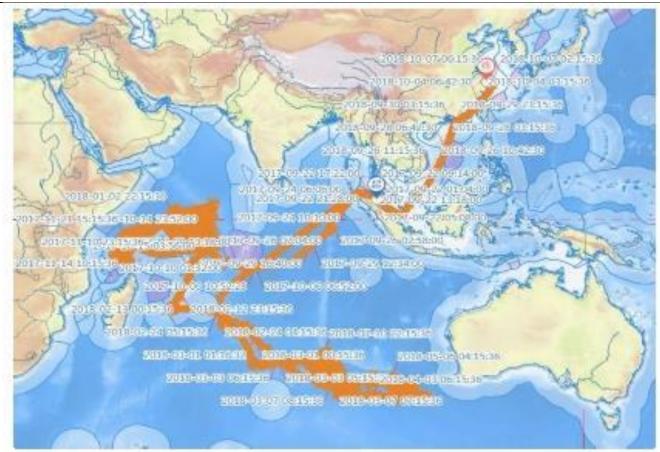


PTR68 20170920-20181007





PTR71 20180321-20181007

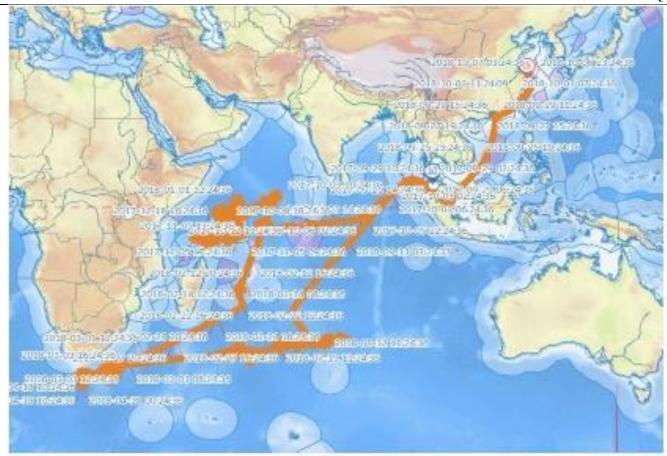


PTR318 20170922-20181007

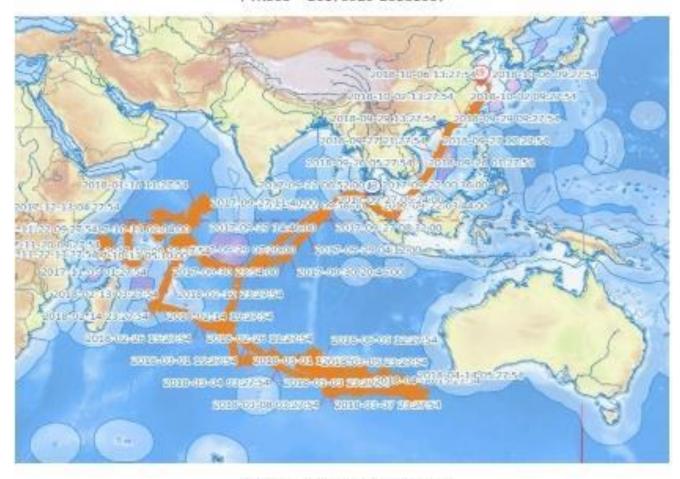


PTRL2 20180512-20180905

IOTC-2019-CoC16-08b [E]



PTR303 20170929-20181007



PTR316 20170922-20181007

Zhejiang Academy of Science and Technology for Inspection and Quarantine







TEST REPORT

Report No: D18018379 Report Date: .2018/12/17
Client Name: Research Center of International Laws and Affairs for Contact person: Liu Yang

Distant-water Fisherises

Date of Receipt: 2018/12/10 Sample Size: 46

Sample Description: freezing

Test Result(s)

SampNo	SampName	ItemName	Result	TestLimit	Unit	MethodNo
Y18029984	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	1	/	S-NS019
Y18029988	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	1	1	S-NS019
Y18029989	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	1	/	S-NS019
Y18029990	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	1	/	S-NS019
Y18029991	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18029992	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	•		S-NS019
Y18029993	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	1	1	S-NS019
Y18029994	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	1	1	S-NS019
Y18029995	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	1	1	S-NS019
Y18029996	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019

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IOTC-2019-CoC16-08b [E]

Y18029997	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18029998	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18029999	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030000	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030001	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030002	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030003	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030004	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030005	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030006	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030007	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030008	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030009	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030010	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030011	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030012	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030013	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019

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IOTC-2019-CoC16-08b [E]

Y18030014	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030015	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030016	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030017	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030018	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030019	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030020	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030021	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030022	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030023	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030024	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030025	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030026	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030027	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030028	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030029	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019
Y18030030	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019

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Y18030031	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	1	S-NS019
Y18030032	Southern bluefin tuna(Thunnus maccoyii)	Thunnus maccoyii	No Thunnus maccoyii DNA detected	/	/	S-NS019

End of the list

Note:

- * The results shown in this test report refer only to the sample(s) tested, and cannot be used for any improper publicity.
- * This test report cannot be reproduced except in full, without written approval of the laboratory.
- * Not Detected means not detected at or above the limit of quantification.

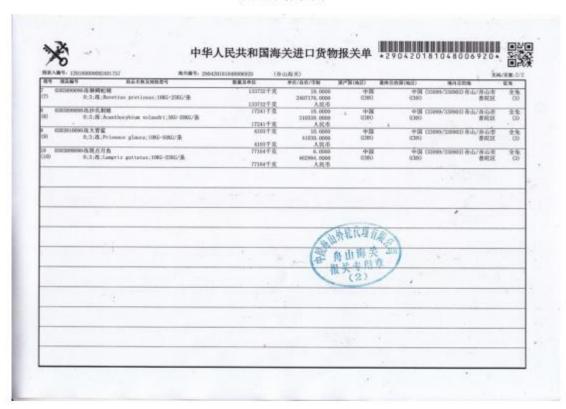
Authorized Signature:

张明九





平太荣报关单-1



平太荣报关单-2

Extract from Circular #2019/006: Letter from the EU dated 24 January 2019

"3. SBT trade in the EU reported in the Global Trade Atlas

Recurrently the EU, among others, is asked to investigate alleged SBT trade reported in the Global Trade Atlas and advise the secretariat on specific trade exchanges. The EU has many times investigated those exchanges for which the conclusions invariability have indicated that it is a case of miscoding of SBT, notably by mistaking SBT with Atlantic bluefin tuna, which is one of the main fishing products in the EU market.

Global Trade Atlas provides trade information that sometimes uses non-official sources. In addition to that, as the 28 EU Member States operate as a single market without internal customs or trade barriers, it can be difficult to interpret some data for individual Member States.

In fact, the official European statistics on international trade in goods come from COMEXT, Eurostat's reference database for trade in goods. While trade in goods statistics with non-EU countries are mainly collected from customs authorities and based on customs declarations, the information on intra-EU trade is collected on the basis of the declarations by individual trade operators and, therefore, more prone to miscoding.

To conclude, while compiling the compliance report, 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."

みなみまぐろ保存委員会

Commission for the Conservation of Southern Bluefin Tuna



Mr. Imad Lahoud Dep. of Fisheries & Wildlife (DFW) Ministry of Agriculture (MOA) Bir Hassan district - Embassies Street Beirut, Lebanon email: ilahoud@agriculture.gov.lb

22 May 2019

Dear Mr. Lahoud,

RE: Cooperation Between Lebanon and the CCSBT

I present my compliments to you on behalf of the Commission for the Conservation of Southern Bluefin Tuna (CCSBT). The CCSBT is the intergovernmental organisation responsible for the management of Southern Bluefin Tuna (SBT) throughout its distribution.

One of the CCSBT's main conservation and management measures is its Catch Documentation Scheme (CDS). The CCSBT considers that exports, re-exports or imports of SBT are illegal unless they are accompanied by appropriate CCSBT CDS documents¹.

From trade statistics and information provided to us by Indonesia (one of CCSBT's Members), it appears that Indonesia exported SBT to Lebanon at least between the years 2011 to 2017 inclusive.

Lebanon is not a Member of the CCSBT and so it is not bound by CCSBT's Resolutions. However, we would like to explore opportunities for Lebanon to voluntarily cooperate with the CCSBT.

We would like to request that Lebanon consider:

- Not accepting any imports of SBT that are not accompanied by the appropriate CDS documents¹.
- Voluntarily sharing with the CCSBT:
 - o Copies of CCSBT CDS documents that accompany SBT imported into Lebanon; and
 - Any trade information *e.g.* quantities of any imports and re-exports of SBT and the trading States concerned.

Please let me know if you have any queries concerning the information provided in this letter. I hope that Lebanon will be able to consider our requests favourably.

Yours sincerely,

Robert Kennedy Executive Secretary

¹ Either a Catch Monitoring Form (CMF) or Re-export/Export after Landing of Domestic Product Form (REEF) or both.

COMTRADE's Listed Data Sources

Member	COMTRADE Data Source
Australia	Australian Bureau of Statistics
European Union	COMEXT ¹
Indonesia	Statistics Indonesia/ Statistical Services and Promotion
Japan	Ministry of Finance, Japan
Korea	South Korea Customs Service
New Zealand	Statistics New Zealand
South Africa	South African Revenue Service
Taiwan	International Trade Commission/ FTP ²

Common Trading Partners	COMTRADE Data Source
China	General Administration of Customs of China
Hong Kong	Permanent Mission of the People's Republic of China
Singapore	(International) Enterprise Singapore
USA	US Census Bureau

¹ COMEXT is Eurostat's reference database for detailed statistics on international trade in goods. It provides access to both recent and historical data of the EU and its individual Member States as well as to statistics of a significant number of non-EU countries.

 $^{^{\}rm 2}$ The Secretariat is uncertain what the abbreviation FTP represents

EXPORT/ IMPORT STATISTICS: 2016 – 2018 (COMTRADE)

Note:

Non-Cooperating Non-Members (NCNMs) appear at the bottom of all tables and are shaded in light grey. All trade figures except for Taiwan's have been sourced from UN COMTRADE.

EXPORTS and RE-EXPORTS

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

Exporter	2016	2017	2018
Australia	1,317.6	1,049.0	5,472.8
EU	376.5 ¹	2.0	19.2
Indonesia			0.3
Japan	0.1	0.1	
Korea	61.3	58.8	8.2
New Zealand	761.7	765.5	827.4
South Africa	1.9	31.8	42.6
Algeria	133.7	484.6	
Iran	4.3	22.1	
Oman	20.0	33.0	
USA	127.5	97.9	141.6

Table 1b - Re-exports: Fresh/Chilled SBT (Commodity Code 030236)

Re-exporter	2016	2017	2018
Oman		33.0	
USA		34.5	36.4

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

Exporter (030346)	2016	2017	2018
Australia	7,032.1	7,567.8	8,666.1
EU	0.1	5.3	0.0
Indonesia	11.0	16.0	
Japan	169.1	172.3	248.0
Korea	998.7	628.8	1,313.1
South Africa	0.6		
Taiwan	647.5	880.9	812.1 ²
Oman	24.3		
Sri Lanka		14.8	
USA	15.7	2.7	
Viet Nam	1.1	8.4	

¹ 375.1t of this 376.5t was recorded as an export from the Netherlands

² This figure was not yet available from COMTRADE and was instead sourced directly from Taiwan's Bureau of Foreign Trade website from which trade data is publicly accessible: https://cus93.trade.gov.tw/FSCE020F/FSCE020F (COMTRADE figures for 2016 and 2017 match the figures provided on this website)

IMPORTS

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

Importer	2016	2017	2018
Australia	5.5	0.8	5.0
EU	572.0 ³	22.8	11.3
Japan	2,087.9	1,892.8	1,854.4
Korea	0.1	7.8	5.3
New Zealand	0.1	0.1	0.1
South Africa	5.1	8.8	
Taiwan		0.1	
Bahrain	2.4		
Canada	37.9	49.6	78.6
China	0.3	20.4	
Ghana	108.2		
Hong Kong	5.3	4.7	2.0
Malaysia	2.7	0.1	21.4
Oman		33.0	
Singapore	4.2		2.4
United Arab Emirates	0.5	3.0	0.7
USA	80.6	19.2	60.4

Table 2b – Imports: Frozen SBT (Commodity Code 030346)

Importer	2016	2017	2018
Australia	0.1	0.1	2010
EU	11.7	17.5	44.9
Japan	9,518.5	8,391.6	9,561.1
Korea	386.9	799.6	671.7
New Zealand	0.02		
Brunei Darussalam		0.3	9.3
Cabo Verde		2.4	
Canada	6.9	0.0	7.2
China	0.2	218.9	
Cote d'Ivoire	27.0	412.5	
Ghana		91.2	
Kazakhstan		2.5	
Malaysia		54.4	27.3
Mauritius	1.6 ⁴	2.0 ⁴	
Qatar	0.3		77.5
Thailand	27.7		
United Arab Emirates	0.2	21.4	51.2
USA	5.1	9.7	31.4

 $^{^{\}rm 3}$ 565.6t of this 572t was recorded as an import into the Netherlands

 $^{^{\}rm 4}$ Mauritius confirmed that this import was not SBT