



CCSBT-CC/2010/10

Potential Non-Member Fishing Activity and Non-Member Trade Queries and Associated Trade Correspondence

1. Introduction

This paper provides:

- A note about the Secretariat's contingency fund with Trygg Mat Tracking; and
- An update on contact made with various Non-Cooperating Non-Members (NCNMs) regarding trade of SBT and CCSBT's Catch Documentation Scheme (CDS). The NCNMs concerned are Canada, Lebanon, Namibia and the USA.

2. Potential Non-Member Fishing Activity

There is nothing to report under this item this year.

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, and therefore the operating fund has not yet been utilised.

4. Compliance Correspondence with NCNMs

During 2020 the Secretariat has made contact with various NCNMs concerning trade, catch and CDS queries.

Canada

Contact was re-initiated with relevant officials at Fisheries and Oceans, Canada concerning the Secretariat's query as to whether all recently reported SBT imports into Canada (for commodity codes HS 030236 and 030346) could be confirmed to be SBT. During August 2020, the Secretariat received a response advising that Canada has detected a processing error in its systems which is suspected of having inflated reported trade volumes for some countries. Canada has now corrected this error and revised some of its data accordingly. However, further internal processing is still required, and some revised figures may not be available online until early February 2021.

The Secretariat notes that some revisions to Canada's SBT import statistics are already evident on the Statistics Canada website (less SBT imports are now generally recorded from less export States), but that further revisions to those SBT trade statistics may not be available until at least February 2021 as indicated by Canadian officials.

Lebanon

The Secretariat continued its efforts to establish a cooperative relationship with Lebanon, especially given that CCSBT's CDS recorded that 23.7t of SBT were exported from Indonesia to Lebanon during 2019.¹

As reported to CC14, the Executive Secretary wrote an official letter to the Ministry of Agriculture in Lebanon in May 2019 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 formal response was received and the Secretariat's contact in Lebanon² suggested that the Secretariat follow up with a new letter to the Customs Administration of Lebanon (CAL) which was initially sent on 02/10/2019 and then re-sent on 07/01/2020 (**Annex 1** – see Attachment B). The Secretariat received an email reply from CAL on 23/06/2020 including an import extract from CAL's database showing that it had not recorded any imports of SBT into Lebanon from 2010 to 2019 inclusive, and noting that, "*the Ministry of Agriculture is the competent authority regarding your request.*"

The Secretariat followed up by writing a new letter to its contact at the Ministry of Agriculture, Lebanon in July 2020 (**Annex 1**), including a request that Lebanon review its process for recording imports of SBT. The Secretariat has not received an acknowledgment to this most recent letter and so has not been able to confirm whether it was received.

Namibia

Namibia has declared catches of SBT to ICCAT for 3 years since the year 2000: 1t (2005), 13t (2014) and 17t (2016).

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.*"

Further, in August 2019 Namibia communicated 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."

Following a request from one CCSBT Member and noting some finalised text from a yet to be published 2018-19 ICCAT report³, the Secretariat followed up with Namibia again during July and August 2020 with a query about its potential interactions with SBT.

Namibia has not yet responded to the Secretariat on this matter.

¹ Indonesia confirmed the names of the two intended importers of this SBT - both are located in Beirut

² An official at the Department of Fisheries and Wildlife, Ministry of Agriculture, Lebanon

³ "*Namibia introduced its request for a research allocation, noting that its longline vessels operating in the South Atlantic occasionally, though rarely, bycatch bluefin tuna when targeting albacore. The SCRS Chair explained that there was a very low probability that this bycatch came from the eastern stock of bluefin tuna and that it was likely to concern southern bluefin tuna. The Panel Chair noted that this matter should therefore be addressed by the CCSBT rather than ICCAT.*"

USA

The USA continues to cooperate with the CCSBT's CDS by providing quarterly reports of available SBT CDS import documents and following up with respect to some missing import documents.

5. Summary of Trade Data from UN COMTRADE

The Secretariat is not providing a summary of trade data from the UN COMTRADE this year as compliance resources were instead prioritised to the additional work associated with the COVID-19 pandemic situation and the QAR of the European Union.

6. Recommendations

It is recommended that CC15:

- Notes the information presented in this paper and recommends any required follow-up actions.

Prepared by the Secretariat

Commission for the Conservation of
Southern Bluefin Tuna



みなみまぐろ保存委員会

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

10 July 2020

Dear Mr. Lahoud,

RE: Imports of Southern Bluefin Tuna into Lebanon

I present my compliments to you on behalf of the Commission for the Conservation of Southern Bluefin Tuna (CCSBT).

I wrote to you in May 2019 (see **Attachment A**) and at your suggestion, to the Customs Administration of Lebanon (CAL) in October 2019 (see **Attachment B**). I received an email response from the CAL on 23 June 2020, which contained Lebanese general trade statistics from 1 January 2010 to 31 December 2019, for which I am very appreciative. However, these trade statistics contained no record of imports of southern bluefin tuna into Lebanon despite CCSBT having records that confirm southern bluefin tuna was exported to Lebanon during this period.

I am not sure if Lebanon's policy is to record all tuna imports to species level where possible. If this is not Lebanon's policy, I respectfully request that Lebanon give consideration to implementing such a policy. This would help the monitoring of global traffic of southern bluefin tuna (and other tuna) and sustainable management of these fisheries.

If Lebanon's policy already involves recording of tuna imports to the species level, then a problem may have occurred with imports of southern bluefin tuna. To help Lebanon to investigate the possible issue, I have attached details for exports of southern bluefin tuna from Indonesia to Lebanon during 2019. These details include the name of the intended importer, the intended importer's location, the net weight exported and the CCSBT REEF Document Number. The "REEF" is a CCSBT form for re-export or export of southern bluefin tuna after landing of domestic product. This REEF document should have accompanied the southern bluefin tuna exported from Indonesia and should therefore have simplified the identification of these imports.

I would appreciate it if Lebanon could review its process for the recording of imports of southern bluefin tuna, particularly for the future, and advise me of the outcomes of the review.

Please contact me if you have any questions.

Yours sincerely,

Robert Kennedy
Executive Secretary

CC: Customs Administration of Lebanon

Emails: gdc@customs.gov.lb
hcc@customs.gov.lb
info@customs.gov.lb
raymond.Khoury@customs.gov.lb
fadi.Bougharios@customs.gov.lb

Commission for the Conservation of
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みなみまぐろ保存委員会

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:
 - 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.

Commission for the Conservation of
Southern Bluefin Tuna



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Customs Administration of Lebanon
Riad El Solh Square
Beirut, Lebanon
Email: gdc@customs.gov.lb
hcc@customs.gov.lb
info@customs.gov.lb
raymond.Khoury@customs.gov.lb
fadi.Bougharios@customs.gov.lb

2 October 2019

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).

In May 2019, I sent the attached letter to Lebanon's Department of Fisheries and Wildlife (Ministry of Agriculture) addressed to Mr. Imad Lahoud. Mr. Lahoud kindly forwarded the letter to the appropriate directorate of that Ministry, but I have yet to receive a formal response. It has been suggested that it would be helpful if I send a similar letter to Lebanon's Customs Administration, hence the reason for this correspondence.

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.

After checking trade statistics and some 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 2018 inclusive.

Lebanon is not a Member of the CCSBT and so is not bound by any of its Resolutions, however we would like to explore whether there are opportunities for Lebanon to voluntarily cooperate with the CCSBT.

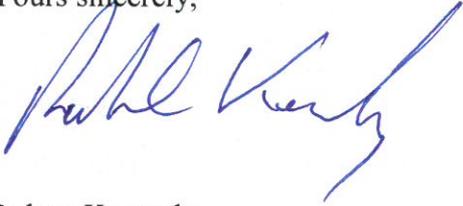
We would like to request that Lebanon consider:

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

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

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,

A handwritten signature in blue ink, appearing to read 'Robert Kennedy', with a stylized flourish at the end.

Robert Kennedy
Executive Secretary

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

Commission for the Conservation of
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