



CCSBT–CC/2110/11

Potential Non-Member Fishing Activity/Trade & Trade Summaries

1. Introduction

This paper provides:

- A note about the Secretariat's contingency fund with Trygg Mat Tracking (TMT);
- A summary of relevant correspondence with Non-Cooperating Non-Members (NCNMs) with respect to fishing/trade including an update on a CC15 Workplan item for the Secretariat to write to the Russian Federation;
- An update on provision of national trade data summaries for 2018 to 2020 by the EU and Indonesia (CC15 workplan item);
- An update on any NCNM catch reported to ICCAT¹; and
- A brief summary of SBT trade information between 2018 and 2020 extracted from the United Nations (UN) COMTRADE database.

2. 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 AUD \$9,969 (USD \$7,000) 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 2021, and therefore the operating fund has not yet been utilised.

3. Communications with Non-Members

During 2021 the Secretariat has continued to communicate or initiate communication with several non-Members.

China

In 2020, CCSBT 27 discussed communications with China and agreed the following action item²:

“105. Discussion also noted that:

A reminder should be sent to China with regard to the CCSBT's query on implementation of China's regulations concerning SBT and China's monitoring of the compliance of its vessels.”

On 10/12/2020, the Secretariat sent a reminder to China as well as an invitation to attend CCSBT 28 (refer to the first attachment of paper CCSBT-EC/2110/13). The Secretariat re-sent this invitation and reminder on 3 August 2021. At the time of finalising this paper, no response had been received from China on either matter.

¹ International Commission for the Conservation of Atlantic Tunas

² Refer to the [Extended Commission's \(EC's\) meeting report](#), paragraphs 105 and 108

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 to the Secretariat 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.”

In addition, a 2019 ICCAT report³ stated that:

“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.”

The Secretariat followed up with Namibia during July and August 2020, and in April, June and August 2021 concerning its potential interactions with SBT, as well as inviting it to attend CCSBT’s annual meetings. Unfortunately, Namibia has not yet responded to the Secretariat.

Russian Federation

CC15 tasked the Secretariat with writing to the Russian Federation to seek clarification about its notification to ICCAT that it intends to fish for SBT. The Secretariat wrote to the Russian Federation as requested on 12/11/2021⁴ and re-sent its correspondence on 21/04/2021.

However, no response had been received at the time of finalising this paper.

USA

The USA continues to cooperate with the CCSBT’s CDS by providing quarterly submissions of CDS import forms.

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

CC15 requested that:

- The EU and Indonesia provide the best available annual trade data summaries (volumes of fresh/frozen SBT exported/imported in tonnes) from their own national databases to the Secretariat (for the years 2018, 2019 and 2020).

These summaries have been submitted to the Secretariat by both the EU and Indonesia and are provided in **Attachment A**.

5. Check of ICCAT Records for Newly Reported SBT Catch

In 2019, CC14 requested that the Secretariat check ICCAT’s website⁵ to confirm whether any new catches of SBT by CCSBT Non-Cooperating Non-Members (NCNMs) have been reported to ICCAT. The Secretariat continued this checking during 2021 and advises that no further SBT catch has been reported to ICCAT by NCNMs since 2016 (69t by Brazil and 17t by Namibia) and 2017 (1t by Brazil).

³ [ICCAT Report for biennial period, 2018-19, PART II \(2019\) - Vol. 1](#)

⁴ Refer to Attachment G of paper CCSBT-EC/2110/13

⁵ <https://www.iccat.int/en/t1.asp>

6. Summary of Trade Data from the UN COMTRADE Database

A summary of COMTRADE database information for SBT for the period 2018 to 2020 is provided at **Attachment B**. A summary of reported trade of live SBT is included although it is almost certain that this apparent live trade can be attributed to product miscoding.

In January 2019 the EU provided a letter which was circulated to all Members⁶ which concluded that, “.... *the CCSBT secretariat should instead source its trade data analysis mainly from the trade information provided by the EU in its annual compliance report and information based on the implementation of the Catch Documentation Scheme.*”

The Secretariat notes that for the period between 2018 and 2020, both the CDS database and the EU’s annual reports to the Compliance Committee (CC) and Extended Commission (CC), record only one small import of less than approximately 0.45 tonnes⁷ of SBT into the EU. COMTRADE indicates a higher level of SBT trade by EU Member States, however, live trade and/or fresh exports of SBT can almost certainly be attributed to miscoding due to practical constraints.

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

COMTRADE: Exports and Re-exports (*Attachment B: Tables 1a-d*)

- Indonesia’s SBT exports continue to be under-represented in all years of the COMTRADE export statistics – COMTRADE records only 0.3t, 12.7t and 24.4t of total exports (fresh and frozen SBT combined) for 2018, 2019, and 2020 respectively.
- South Africa’s exports are also under-represented on the COMTRADE database for 2018 and 2019 – COMTRADE records only 42.6t, 75.1t (fresh and frozen SBT combined), whereas the CDS records 159.2t and 116.4t of total direct SBT exports for 2018 and 2019 respectively. There are also 81.9t and 2t of *live* SBT exports recorded for South Africa (generally going to either Japan or the USA) in 2018 and 2019, so it seems likely that these were perhaps miscoded fresh exports. There was also less than 1t of live SBT recorded in each year as being exported to Namibia. For 2020, COMTRADE records that there were 71.8t of total South African SBT exports which is very similar to the 2020 South African exports recorded on the CDS (68.9t).
- The USA is recorded as having significant exports of fresh/chilled SBT – 141.6t, 52.3t and 97.9t for 2018, 2019 and 2020 respectively. As has been noted in past years, due to this product being recorded as fresh, this seems likely to be miscoded product.
- For 2018 to 2020, the COMTRADE statistics record very small quantities of SBT exported by EU Members with the exception of Italy which is recorded as having exported 93t and 55.8t of fresh SBT in 2019 and 2020 respectively – this must be miscoded product as it’s logistically not feasible that Italy could be exporting fresh SBT.
- There are some medium to significant unexpected fresh/chilled export figures recorded for Iran, Libya, Tunisia and the United Arab Emirates. From a practical perspective, it is extremely unlikely that these exports can be SBT, but again are likely to be the result of product miscoding. For example, a more detailed examination of the COMTRADE data indicated that the 44t of product recorded as exported by the United Arab Emirates (UAE) in 2019 was first imported from Thailand and then re-exported by the UAE to Yemen. This would preclude it from being fresh SBT.

⁶ CCSBT Circular #2019/006, refer to **Attachment D** of [CCSBT-CC/1910/10](#)

⁷ This import occurred in 2019

COMTRADE: Imports (*Attachment B: Tables 2a-c*)

- For 2018 to 2020, the COMTRADE database records SBT imports by EU Members, including a very large import of frozen product (781.78t⁸) by Italy in 2020. These figures appear to indicate that species miscoding by EU Member States is continuing to occur.
- The CDS recorded 0.4t of direct SBT exports to Canada in 2020, whereas COMTRADE records 71t (fresh and frozen imports combined) of SBT imported into Canada in 2020.
- There are some medium to large fresh/frozen SBT import figures unexpectedly recorded for Qatar (2018 - 2019) and the United Arab Emirates (2018 – 2019). Further examination of the COMTRADE database revealed that the product imported into Qatar had come from Thailand, and the fresh/frozen product imported into the UAE came predominantly from India, Vietnam and Spain, therefore making it very unlikely to be SBT.
- Malaysia is also recorded by COMTRADE as being a significant SBT importer – 21.4t and 112.6t of fresh product in 2018 and 2019 respectively, and 27.3t, 788.7t and 555.6t of frozen product in 2018, 2019 and 2020 respectively. The Secretariat examined the COMTRADE database in more detail to determine where COMTRADE records the Malaysian imports originating from, noting that it is implausible that fresh SBT was imported from the Netherlands (Tables a & b below).

a) Fresh Product (*all values in the table are net weights in tonnes*)

Originating State of Malaysian SBT Imports (from COMTRADE)	2018	2019	2020
Indonesia ⁹	20.00		
Japan	1.37	0.56	0.01
Netherlands (EU) ⁹		112.00	
Total	21.37	112.56	0.01

b) Frozen Product (*all values in the table are net weights in tonnes*)

Originating State of Malaysian SBT Imports (from COMTRADE)	2018	2019	2020
Australia		0.19	
China		28.00	
India	27.00		
Japan	0.28	0.18	1.65
Netherlands (EU) ⁹		735.21	553.95
Poland (EU) ⁹		25.09	
Total	27.28	788.67	555.60

7. Recommendation

It is recommended that CC16:

- Notes the information presented in this paper.

Prepared by the Secretariat

⁸ 753.6t of this import is recorded as coming from Malta, 20.5t from Spain, 6.6t from Denmark, and 1.2t from the Netherlands

⁹ The European Union and Indonesia questioned the reliability of COMTRADE data for their SBT trade and have provided separate information (**Attachment A**) as being the best source of SBT trade information for them.

EU and Indonesian National Trade Data Summaries Provided for 2018–2020 Inclusive

CC15 tasked the European Union and Indonesia with providing the best available annual trade data summaries (volumes of fresh/frozen SBT exported/imported in tonnes) from their own national databases to the Secretariat (for the years 2018, 2019 and 2020).

These data were provided in July 2021 by both Members and the details of their submissions are attached below.

European Union

The Information provided by the EU on 16/07/2021 was:

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

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

Indonesia

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

Indonesia SBT export 2018 - 2020

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

On 27/07/2021 Indonesia also confirmed that:

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

COMTRADE DATABASE EXPORT, RE-EXPORT & IMPORT FIGURES: 2018 - 2020

Note:

Non-Cooperating Non-Members (NCNMs) appear in the bottom half of all tables and are shaded in light grey.

EXPORTS and RE-EXPORTS

Table 1a – Exports: Live SBT (Commodity Code 030195)

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

Exporter	Quantity (tonnes)		
	2018	2019	2020
Australia			0.78
EU-France ¹		0.14	0.25
EU-Greece ¹			1.84
EU-Italy ¹			0.01
New Zealand	1.11		
South Africa	81.85	2.01	
Brazil	0.46	0.04	
Mozambique		5.64	
Myanmar	0.26		
Tunisia	862.34		
United Arab Emirates		0.10	
USA	2.87	2.49	
Grand Total	948.89	10.42	2.88

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

Exporter	Quantity (tonnes)		
	2018	2019	2020
Australia	987.67	831.18	2,269.63
EU-Croatia ¹		0.07	
EU-France ¹		1.08	1.03
EU-Greece ¹	0.04		
EU-Italy ¹		93.04	55.80
Indonesia ¹	0.26	12.48	12.54
Korea	8.15	12.38	69.81
New Zealand	827.42	792.49	694.22
South Africa	42.64	75.14	71.84
Brazil	0.07	0.27	0.10
Canada		0.07	
Egypt			0.41
Iran	25.09		
Senegal	0.93		
Tunisia		1,111.37	
United Arab Emirates	0.20	44.00	
USA	141.57	52.28	97.92
Grand Total	2,034.04	3,025.85	3,273.30

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

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

Exporter	Quantity (tonnes)		
	2018	2019	2020
Australia	8,134.14	8,425.82	6,800.08
EU-Croatia ¹			0.04
EU-France ¹			0.29
EU-Italy ¹	0.01		
Indonesia ¹		0.22	11.86
Japan	248.02	157.65	7.75
Korea	1,313.08	1,083.59	917.49
South Africa		0.08	
Taiwan	812.14	956.80	673.13
Brazil	0.53	3.47	5.05
Hong Kong	0.30		
Libya	46.21		
Maldives	1.00		
Mozambique		25.36	
Singapore	0.06		
Sri Lanka		12.05	
United Arab Emirates		4.44	
USA			10.64
Grand Total	10,555.49	10,669.48	8,426.33

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

Re-exporter	Quantity (tonnes)		
	2018	2019	2020
United Arab Emirates		4.44	
USA			1.32
Grand Total	0	4.44	1.32

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

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

Importer	Quantity (tonnes)		
	2018	2019	2020
EU-France ¹		0.20	0.09
EU-Greece ¹			1.96
EU-Italy ¹	15.54	11.29	1.25
EU-Luxembourg ¹			0.19
EU-Romania ¹			0.35
Angola	0.76		
Bahamas	0.24		
Bahrain	1.33		
Bermuda	0.05		
Brunei Darussalam	0.15	0.10	
Canada	0.59		
Ghana	0.06	0.01	
Kuwait		0.27	
Lao People's Dem. Rep.		0.02	
Madagascar	1.50	18.49	
Malaysia		0.13	
Niger	0.80		
Nigeria		0.01	
Saudi Arabia	14.45	6.49	
Singapore	0.01		
Tunisia	654.60	323.17	
United Arab Emirates	0.12		
Yemen	2.76		
Grand Total	692.96	360.18	3.84

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

Importer	Quantity (tonnes)		
	2018	2019	2020
Australia	11.58	1.73	2.79
EU-Denmark ¹		0.005	0.003
EU-France ¹		28.522	2.66
EU-Germany ¹		0.447	
EU-Greece ¹		2.302	
EU-Italy ¹	6.567	5.288	3.437
EU-Luxembourg ¹			0.273
EU-Poland ¹	0.032		0.01
EU-Romania ¹	0.13	0.12	
EU-Slovakia ¹	0.02	0.23	0.07
Japan	1,853.88	1,551.26	1,190.38
Korea	5.27	0.54	
New Zealand	0.06	0.07	0.15
Antigua and Barbuda		0.23	
Bahamas	0.72		
Botswana	0.01		
Canada	1.74	0.85	58.20
China	49.05	82.69	46.18
China, Macao SAR	0.25		
Georgia	0.02		0.08
Guatemala		3.44	
Hong Kong	2.00	0.22	1.50
Kazakhstan		12.00	
Kuwait		0.24	
Malawi		0.04	
Malaysia	21.37	112.56	0.01
Norway		0.28	
Oman	3.70		
Serbia		0.02	0.17
Singapore	2.35	0.89	19.48
Switzerland	0.11	0.11	0.50
Thailand	0.73		
Uganda	0.03		
United Arab Emirates	0.67	44.36	
USA	60.40	70.23	129.53
Zambia	1.46		
Grand Total	2,022.00	1,918.67	1,455.42

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

Importer	Quantity (tonnes)		
	2018	2019	2020
EU-Bulgaria ¹		0.04	
EU-France ¹		1.20	0.11
EU-Greece ¹	43.25	8.69	8.12
EU-Italy ¹	1.61	12.22	781.78
EU-Slovenia ¹		0.06	
Japan	9,561.09	10,001.52	9,701.80
Korea	671.71	466.91	163.41
Angola	0.551		
Bahrain	0.20		
Barbados		1.94	
Brunei Darussalam	9.30		
Canada		0.06	12.79
China	0.10	0.03	
Cote d'Ivoire		25.96	
Kuwait		4.11	
Malaysia	27.28	788.67	555.60
Maldives	0.03		
Mozambique	0.10		
Qatar	77.50	30.69	
Saudi Arabia		0.86	
Singapore	0.54	1.24	8.05
Switzerland	0.06		0.01
Thailand			0.03
United Arab Emirates	51.20	0.004	
USA	31.36	40.64	30.32
Grand Total	10,475.88	11,384.84	11,262.02