



CCSBT-CC/2010/10

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

### 非メンバーによる漁業活動の可能性及び 非メンバーによる貿易に関する質問及びそれに伴う対応

#### 1. Introduction

##### 序論

This paper provides:

本文書では以下の情報を提供する。

- A note about the Secretariat's contingency fund with Trygg Mat Tracking; and Trygg Mat Tracking 向けの事務局の臨時資金に関する注記
- 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.  
SBT の貿易及び CCSBT 漁獲証明制度 (CDS) に関する様々な非協力的非加盟メンバー (NCNM) との連絡に関するアップデート。関連する NCNM は、カナダ、レバノン、ナミビア及び米国である。

#### 2. Potential Non-Member Fishing Activity

##### 非メンバーによる漁業活動の可能性

There is nothing to report under this item this year.

本年は、本項目の下に報告する事項はない。

#### 3. Contingency Fund with Trygg Mat Tracking (TMT)

##### Trygg Mat Tracking (TMT) 向けの臨時資金

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.

2018 年において、CCSBT 25 は、2019 年の SBT 漁場における不審な漁業活動が事務局に報告された際のフォローアップとして、その報告の都度、船舶自動識別装置 (AIS) データの解析を行うとともに船舶と企業との関係を精査することができるよう、事務局が Trygg Mat Tracking (TMT) と契約するための少額の予算 (20,000 ドル) に合意した。このサービスに関する合意書には 2019 年 2 月 1 日に署名がなされ、CCSBT からの解析要請のために留保しておく運用資金として、TMT に対して頭金 9,969 ドル (7,000 米ドル) の支払いが行われた。今日までに TMT による臨時解析が要請されたことはなく、したがって運用資金はまだ利用されていない。

#### 4. Compliance Correspondence with NCNMs

##### NCNM との遵守対応

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

2020年において、事務局は、貿易、漁獲及びCDSに関する質問について様々なNCNMと連絡をとった。

##### *Canada*

##### カナダ

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.

カナダの漁業及び海洋関係当局と事務局との間で、近年カナダに輸入されたと報告されている全てのSBT（商品コードHS 030236及び030346）がSBTであると確認できるかどうかに関する連絡が再開された。2020年8月に、事務局は、カナダ国内のシステムにおいて一部の国に対する報告貿易量が膨らませられた可能性がある処理エラーを検知したとの連絡を受けた。カナダはこのエラーを修正しており、それに伴って一部のデータを修正した。しなしながら、さらなる国内プロセスが未だ必要とされており、一部の修正された数字は2021年2月上旬までオンラインでは利用可能とならない可能性がある。

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.

事務局は、カナダのSBT輸入統計に対する一部の修正についてはカナダ統計ウェブサイトにおいて既に明らかにされている（概してより少ないSBT輸入量がより少ない輸出国からのものとして記録されている）ことに留意しているが、カナダ当局が示唆したとおり、これらのSBT貿易統計に対するさらなる修正については早くとも2021年2月まで利用可能とならない可能性がある。

##### *Lebanon*

##### レバノン

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.<sup>1</sup>

事務局は、特にCCSBTのCDSにおいて2019年にインドネシアからレバノンに23.7トンのSBTが輸出されたとして記録されていること<sup>1</sup>を踏まえ、引き続きレバノンとの協力関係の確立に努めた。

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<sup>1</sup> Indonesia confirmed the names of the two intended importers of this SBT - both are located in Beirut インドネシアは、予定されているSBT輸入者として2者（いずれもベイルート所在）の名称を確認した。

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:

CC 14 で報告したとおり、事務局長は、2019年5月にレバノン農業省に対して以下を検討するよう要請する公式書簡を送付した。

- not accepting imports of SBT product into Lebanon if unaccompanied by appropriate CDS documentation, and  
適切な CDS 文書が伴っていない場合、レバノンへの SBT 製品の輸入を認めないこと
- voluntarily sharing with the CCSBT any CDS documents received as well as SBT trade information.  
受領した全ての CDS 文書並びに SBT 貿易情報を自主的に CCSBT と共有すること

No formal response was received and the Secretariat's contact in Lebanon<sup>2</sup> 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.”*

公式の回答は得られておらず、レバノンにおける事務局との連絡窓口担当者<sup>2</sup>は、事務局からレバノン税関管理局 (CAL) に新たに書簡を送付してこれをフォローアップすることを提案した。最初の書簡は 2019年10月2日に送付され、2020年1月7日に再送された (別添 1 – 別紙 B を参照)。事務局は 2020年6月23日に、2010年から 2019年までの期間にレバノンへの SBT の輸入は全く記録されていないことを示す CAL データベースの輸入情報の抜粋を含み、また「貴殿からの要請に関する所管官庁は農業省である」ことを述べた CAL からの電子メールを受領した。

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.

事務局は、2020年7月にレバノン農業省の連絡窓口担当者に対して新たな書簡 (別添 1。レバノンが SBT の輸入に関する同国の記録プロセスをレビューすることの要請を含む) を送付してこれをフォローアップした。事務局は、この直近の書簡に対する受領確認を得ておらず、この要請が接受されたのかどうかを確認することができていない。

## Namibia

### ナミビア

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

ナミビアは、2000年以降の3年間において、ICCAT に対して以下のとおり SBT の漁獲を申告している：1トン (2005年)、13トン (2014年) 及び 17トン (2016年)。

During May 2019 Namibia made initial contact with the CCSBT Secretariat noting that: ナミビアは、2019年5月に以下を述べる形で事務局に最初の連絡を行った。

*“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.”*

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<sup>2</sup> An official at the Department of Fisheries and Wildlife, Ministry of Agriculture, Lebanon レバノン農業省漁業・野生動物局の職員

「我が国の漁船1隻が南半球で操業しており、いくらかのくろまぐろを漁獲している。これらのくろまぐろを輸出するための手続きがどのようなものかを確認したい。」

Further, in August 2019 Namibia communicated that:

さらに、2019年8月にナミビアは以下のとおり述べた。

*“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.”*

「我が国漁船は、まだくろまぐろ種を水揚げしていない。また我が国管理当局と将来的な我が国の加盟について検討している段階であり、管理当局による承認が得られれば、貴殿が説明された加盟手続きに従う。」

Following a request from one CCSBT Member and noting some finalised text from a yet to be published 2018-19 ICCAT report<sup>3</sup>, the Secretariat followed up with Namibia again during July and August 2020 with a query about its potential interactions with SBT.

あるCCSBTメンバーからの要請を受け、及びまだ公開されていない2018-2019年のICCAT報告書<sup>3</sup>の最終的な文言を踏まえ、事務局は、2020年7月及び8月にナミビアに再度のフォローアップを行い、同国によるSBTとの潜在的な相互作用について質問した。

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

ナミビアは、本件に関してはまだ事務局に回答していない。

## USA

### 米国

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.

米国は、利用可能なSBT輸入CDS文書にかかる四半期報告を提供し、及び一部欠落している輸入文書のフォローアップを行う形で引き続きCCSBTのCDSに協力している。

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<sup>3</sup> “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.” 「ナミビアは、同国はえ縄漁船が南大西洋で操業しており、びんながを漁獲対象とする際に稀ではあるもののくろまぐろを混獲する可能性があることを述べつつ、同国への調査漁獲枠の要望を行った。SCRS議長は、この混獲物が大西洋クロマグロ東系群に由来するものである可能性は非常に低く、みなみまぐろである可能性が高いと説明した。このため、パネル議長は、本件はICCATではなくCCSBTで対応されるべきであると述べた。」

## **5. Summary of Trade Data from UN COMTRADE**

### **国連 COMTRADE から得た貿易データの概要**

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.

事務局は、COVID-19 パンデミックの状況に対応するための追加的な作業及び欧州連合にかかる QAR に遵守関連リソースを重点化したため、本年は国連 COMTRADE から得た貿易データの概要は提示しないこととする。

## **6. Recommendations**

### **勧告**

It is recommended that CC15:

CC 15 に対して以下を勧告する。

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

本文書に提示された情報に留意するとともに、必要なフォローアップ行動を勧告すること。



Commission for the Conservation of  
Southern Bluefin Tuna



みなみまぐろ保存委員会

Mr. Imad Lahoud  
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Ministry of Agriculture (MOA)  
Bir Hassan district - Embassies Street  
Beirut, Lebanon  
email: [ilahoud@agriculture.gov.lb](mailto: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

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Commission for the Conservation of  
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Ministry of Agriculture (MOA)  
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email: [ilahoud@agriculture.gov.lb](mailto: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 documents<sup>1</sup>.

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 documents<sup>1</sup>.
- 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

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



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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 documents<sup>1</sup>.

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.

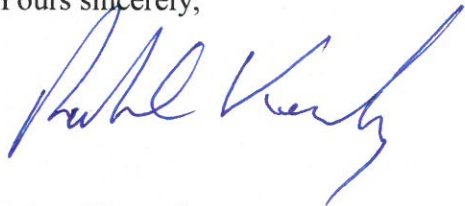
We would like to request that Lebanon consider:

- Not accepting any imports of SBT that are not accompanied by the appropriate CDS documents<sup>1</sup>, 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.

<sup>1</sup> 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', written in a cursive style.

Robert Kennedy  
Executive Secretary

Cc: Mr. Imad Lahoud  
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みなみまぐろ保存委員会

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Dep. of Fisheries & Wildlife (DFW)  
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22 May 2019

Dear Mr. Lahoud,

**RE: Cooperation Between Lebanon and the CCSBT**

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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 documents<sup>1</sup>.
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  - Copies of CCSBT CDS documents that accompany SBT imported into Lebanon; and
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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

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