



CCSBT-CC/1310/14 (Rev2)

Operation of CCSBT MCS Measures

Introduction

This document provides a summary of the operation of the main four CCSBT Monitoring, Control and Surveillance (MCS) measures from the Secretariat's perspective:

- 1) The Catch Documentation Scheme (CDS),
- 2) The Transshipment at Sea Monitoring Program,
- 3) The Vessel Monitoring System (VMS), and
- 4) Records of Authorised Vessels and Farms.

For each measure, the Secretariat's roles/responsibilities with respect to that measure are outlined. In addition, any issues that the Secretariat is aware of in the operation of the measure and any recommendations for changes to that measure are also discussed.

1. Catch Documentation Scheme (CDS)

Secretariat Role

The Secretariat's roles/responsibilities are:

- receiving and processing¹ all CDS documents,
- checking the completeness and accuracy of these documents,
- conducting reconciliations between the different types of CDS forms and between copies of forms provided by exporters and importers,
- following-up with Members/Cooperating Non-members (CNMs) regarding discrepancies and missing information,
- managing validation details submitted by Members/CNMs,
- producing 6 monthly CDS reports,
- maintaining and enhancing the CDS database, and
- coordinating the purchase of centralised tags for use with the CDS.

Electronic CDS (e-CDS) Proposal Update

A significant proportion of CDS information is already provided electronically and consequently the Secretariat's data entry costs for the CDS are small (approximately \$8,600 in 2012). As noted in previous years, the most time-consuming components of the CDS for the Secretariat are reconciliations and following-up and resolving any discrepancies and missing information with Members/CNMs. As a result of this observation, at CC7 there was discussion that these components of the CDS could be made more efficient for all parties if a web based e-CDS was developed and introduced.

The Nineteenth meeting of the Extended Commission supported the request by the Seventh Compliance Committee meeting to explore the costs and benefits of an eCDS system. It was

¹ Loading all electronic documents received (all Catch Tagging Forms from all Members and all Catch Monitoring Forms & Re-Export/Export after landing of Domestic Product forms from Australia) to the database, and data entry of all paper documents received (all other forms).

agreed that a progress report would be provided to the Compliance Committee Technical Working Group held in May 2013 and a final report provided to CC8. This final report is provided to CC8 as paper 16: “Costs and benefits of a web-based eCDS for the CCSBT”, and includes details of the proposal to date.

Indonesian CDS Training Workshop

In mid-August 2013, the CCSBT Compliance Manager travelled to Indonesia to facilitate a training workshop on various aspects of the CDS, CDS Resolution, and associated Minimum Performance Requirements. This workshop was well attended by both Indonesian government officials including managers, administrators, validators and data submitters, as well as by members of Indonesia’s commercial tuna associations. The workshop included productive discussions with regard to common Indonesian CDS document issues encountered by both the CCSBT and Indonesian officials.

CDS Operational Issues

The following are the main CDS operational issues that the Secretariat has observed since the Seventh meeting of the Compliance Committee (CC7). The first 6 of these issues are the same ones that were reported to CC7 in 2012. The Secretariat has continued to work with relevant Members/ CNMs to resolve these issues where possible/ practicable.

1. Late Submission of CDS Documentation

Some of the required CDS documentation due since CC7 continued to be received later than the agreed timeframes, with some Catch Monitoring Forms (CMFs) and catch tagging information not being received until well after the quarterly deadlines.

Time delays in receiving data submissions can make some CDS tasks difficult or impossible to carry out in a timely manner. For example, late submissions may delay the commencement of reconciliation work and/or negatively impact on reconciliation results. Late submissions may also affect the completeness of information that can be provided to meetings and presented in the Secretariat’s six-monthly CDS reports.

2. Tagging Data Mismatches

Many tagging data mismatches and/or missing sets of tagging data continued to be found during the reconciliation process for both 2012 and 2013 CDS data.

Mismatches generally occurred due to one of the following three situations:

- i) some tagging data which should have been submitted as part of the Excel spreadsheet quarterly submission of tagging data were missing, or
- ii) an incorrect or incomplete list of Catch Tagging Form (CTF) numbers was recorded on the CMF, or
- iii) the electronically submitted spreadsheets of catch tagging data contained errors such as referencing incorrect CMF numbers, or containing duplicate CMF numbers.

3. Fish Weight/Number Differing Between Exporter and Importer Copies of a CMF

This item continued to be an issue during 2012 and the first quarter of 2013. In 2012 there were 22 CMFs where the number of fish differed on the exporter and importer copies of the CMF, and 24 CMFs where the weight differed between the exporter and importer copies of CMFs, and a combined total of 30 CMFs where either the number of fish and/or weight was different between exporter and importer CMFs.

In the first quarter of 2013, there were 3 CMFs where the number of fish differed on the exporter and importer copies of the CMF, and 1 CMF where the weight differed between the exporter and importer copies of the CMF, and a combined total of 4 CMFs where either the number of fish and/or weight was different between exporter and importer CMFs.

4. **Importer Data Missing**

There continued to be numerous cases where the Secretariat did not receive copies of the CMF from the final import destination state/entity, even though the export destination (on the exporter copy of the CMF) was recorded as a Member or CNM. In addition, the following issues commonly occurred on importer copies of CMFs:

- i) the import city and/ or import name and/or date were not provided, and
- ii) importers had not signed the final destination section of the CMF.

The Secretariat will produce detailed reports on these items for presentation to CC9 so that importers can be better informed about where these issues are occurring.

5. **Mismatching Page Numbers and Duplicate Form Numbers**

CMFs from Indonesia are currently received as two page documents. As in 2012, there continued to be a number of CMF documents received from Indonesia where the first and second pages had different CMF numbers, but the pages did belong to the same CMF. Indonesia has advised that it will change the length of CMF forms to being a single page so as to prevent this issue occurring in future. This change is already in progress.

In addition, there were a number of Indonesian CMFs that had duplicate (19) or triplicate (1) form numbers, *i.e.* CMFs were received that had the same CMF number but contained different information. Indonesia is also working to put processes in place to address this issue.

6. **South Africa Forms not Authorised by an Authorised Validator**

Last year, reconciliation of the 2011 South African data revealed three CMFs which were considered by South Africa to be fraudulent.

This year, a similar problem occurred during reconciliation of the 2012 data. The Secretariat received two copies of the same form (but with different form numbers) from South Africa. The first copy was not stamped by an authorised validator, but was instead stamped by the same company that submitted the 3 fraudulent forms during 2011. The second copy of the form was stamped by an authorised South African validator, and was noted as being a replacement for the incorrectly validated first copy of the CMF. Japan also provided the Secretariat with copies of two additional South African CMFs where this same situation had occurred.

South Africa has advised the Secretariat that these CMF duplications were a result of the company not providing documents validated by the Department with the original export consignment. An investigation was launched into the matter. Details of the investigation were provided in Circular #2013/052. The investigation concluded that no further action should be taken against the company concerned because there had been no deliberate intent to export illegally-caught SBT product. The situation had arisen as a result of the challenges the exporter faced in exporting fresh SBT after hours.

7. Importer Copies of CMFs (4) not Provided by South Africa for 2012

During 2012, Taiwan sold SBT from four CMFs into the local market in South Africa. South Africa has not yet been able to provide importer copies of the four CMFs concerned, but are currently investigating the matter.

8. Discarded Tags

a) Tagged SBT Discarded Over-board

As part of its reconciliation process, the Secretariat identified an instance where tagged SBT had been discarded over-board. In this case, Taiwan advised that 137 tagged SBT were discarded by the master of a Taiwanese fishing vessel due to an accidental vessel collision that had caused the SBT to become contaminated. Taiwan further advised that according to its domestic regulations, the Taiwanese fishing agency had imposed penalties on the vessel owner and master, and that the fishing vessel is not permitted to fish for SBT from 2012 to 2014. Taiwan requested that the vessel concerned be removed from CCSBT's list of authorised fishing vessels in September 2013.

b) Unused Tags Discarded

The Secretariat investigated the recovery of a Japanese CDS tag found at a beach location in New South Wales, Australia. Japan advised that the tag had not been used and may have been blown off the vessel concerned by the wind. Japan further advised that it often disposes of surplus tags on land when the vessels are in port.

The Secretariat considers that it would strengthen the CDS if records were kept of any:

- tagged SBT that are discarded, and
- un-used tags that are discarded.

9. Non-submission of CDS Documents

The European Union (EU)

The EU has not yet submitted any CDS documents including for 2012 or any previous years despite having caught some SBT². The EU's catch of SBT during 2012 is recorded as being 4.04t. However, in terms of SBT catches, the EU provided information in their National Report noting that:

“The small amount of EU SBT by-catches is either consumed by the vessel crew or given to local workers in the port of landing that assist with off-loading the vessel. By-catches of SBT taken in the WCPFC Convention Area are off-loaded in Papeete (Tahiti), and by-catches taken in the IOTC Convention Area are off-loaded in Durban (South Africa). EU SBT bycatches therefore never enter any commercial channels, for which reason the catch documentation is not filled in or the specimen of SBT are not tagged.”

However, the Secretariat notes that the EU has reported importing SBT between 2010 – 2012, but no import copies of CMFs have been provided to the Secretariat. The EU stated in its National Report that:

² In addition, the EU is yet to authorise any CDS validators.

“The EU is currently collecting data from Member States about imports of SBT in order to be able to undertake an audit of the system used for controlling and monitoring imports of SBT, and to clarify any shortcomings in the system.”

Indonesia

In its National Report to the Extended Commission/ CC8, Indonesia noted that there were 360 vessels in its artisanal longline fleet (< 30GT) during 2012 that caught SBT but were not included in the CCSBT authorised vessel list – refer also to paper CCSBT-CC/1310/04. Since the Secretariat has not received CDS documents from these vessels, it appears that CMF documents were not issued and/or completed for the SBT landings or any potential transshipments from these vessels.

10. Transshipment Information Filled out when no Transshipment Occurred

The Secretariat received approximately 30 CMFs from Taiwan where the transshipment tick-box was selected and partial transshipment information was filled out on export CMFs. These forms therefore all appeared to include incomplete transshipment information. However, queries during the reconciliation process revealed that these forms did not involve transshipments and therefore it had not been necessary to fill out any transshipment information onto these CMFs. Taiwan is working with its operators to ensure that in future they do not fill out the transshipment section of CMFs in cases where no transshipments have occurred.

11. REEFs³ Submitted when not Required

During 2012, both Indonesia and Taiwan submitted REEFs in some cases where it was un-necessary to do so. The Secretariat advised that REEFs are not required to be submitted in situations where the fish were landed in the port with the sole intention of immediately exporting them for the first time from that port (and they were not sold to domestic buyers). In these cases only an export CMF needs to be filled out. Both Indonesia and Taiwan cancelled the un-necessary REEFs and will amend their processes in order not to submit any un-necessary REEFs in future.

12. Establishment of OSECs⁴ to CCSBT’s CDS

CDS data indicate that a relatively large tonnage of SBT product is imported by the USA – 204.6t in 2011 and 189.3t in 2012. Lower levels of SBT product also appear to be imported by Hong Kong, Singapore and more recently China. To date, none of these Non-Cooperating Non-Member States/entities (NCNMs) have become formal OSECs to the CCSBT. As a result, the Secretariat has not yet received importer copies of CMFs from any NCNMs in order to facilitate independent verification of CDS exports to these States/entities.

However, the USA has incorporated instructions about CCSBT CDS documentation into their Highly Migratory Species International Trade Permit Regulations. In addition, during 2013 Singapore also indicated its willingness to cooperate with the CDS in future. Both Singapore and the USA have also indicated they will attend CC8. The Secretariat will continue to promote cooperation of NCNMs to further assist the reconciliation and verification processes in the CCSBT CDS.

The following issues were reported to CC7 and have shown improvement since that meeting:

³ REEFs refers to ‘Re-export/ Export after Landing of Domestic Product Forms’

⁴ The term OSEC refers to Other State/Fishing Entity Cooperating in the CDS

13. CMFs for Exports which Included Valid Authorised Fishing Vessels

In the past, a significant number of Indonesian CMFs for exports included fishing vessels which were not authorised by CCSBT. The percentage of Indonesian CMFs for exports that included valid authorised vessels was recorded as only 58.4% during 2011 – refer to paper CCSBT-CC/1209/04 (Rev 3). For 2012 and the first quarter of 2013, this percentage has increased to 95.9% and 100% respectively.

14. CMFs were Received where Both Export and Landing of Domestic Product Sections had been Filled Out

There were no longer any issues determining whether Taiwanese CMFs represented landing of domestic products or exports due to both sections having been filled out on one form.

15. Data Provided in Languages other than English or Japanese

In the past, on some Taiwanese CMFs, often fishing vessel master information was initially either not filled out in the transshipment section of CMFs, or was provided in a language other than English or Japanese. In addition, in the domestic landing section, buyer information was sometimes either not provided or was provided in a language other than English or Japanese. These issues no longer occurred on 2012 CMFs.

16. Destination Field Not Completed in the Export Section of CMFs

This is no longer a CDS issue of concern to the Secretariat.

POTENTIAL CHANGES TO THE CDS RESOLUTION

A.Changes to the CDS Resolution Recommended by the Secretariat

The following changes to the CDS resolution are suggested or recommended by the Secretariat (**Attachment A** contains the specific recommended changes to the Resolution):

1. The CDS Resolution provides no guidance regarding that minimum period of time that CDS documents need to be retained for. It is proposed that a minimum storage time of five (5) years is added to section 6.1 of the Resolution.
2. Sections 3.3 and 3.4 of the CDS Resolution state the following:
 - 3.3 *Once approved forms are adopted, only minimal modifications, such as the addition of translations, may be made. No information field may be omitted from the standard form, except where the field is not applicable.*
 - 3.4 *Any documentation modified, as described in 3.3, shall be provided to the Executive Secretary for distribution to other Members, Cooperating Non-Members, as well as Non-Members known to be involved in the landing, transshipment, import, export, or re-export of SBT.*

For transparency purposes, it is recommended that section 6.4 of the Resolution is amended to require that copies of all modified forms are placed on the public area of the CCSBT website.

3. The CDS Catch Monitoring Form (CMF) and its instructions specify the following:

“Validation by Authority (not required for transshipments at sea): If this is not a transshipment at sea, enter the name and full title of the official signing the document, together with the signature of the official, date (dd/mm/yyyy) and official seal.”

These instructions could be interpreted to imply that validation of the catch/harvest section of a CMF is not required in cases where landings of domestic product are transhipped at sea.

However, at CC5 the CDS Technical Working Group on Implementation Issues with the CDS (refer to Attachment 6 of the Report of CC5) recognised that validation is required and made the following comments:

- “(i) For transshipments at sea or in port that are landed as domestic product: validation of the catch/harvest section occurs upon landing;*
- (ii) For transshipments at sea that are subsequently exported: the catch/harvest section is not validated, but the export section must be validated before import into the market state (and transshipment observers sign the form);*
- (iii) For transshipments in port that are subsequently exported: both the catch/harvest and export sections must be validated before import into the market state.”*

In addition, the way the instructions are currently written, could make them appear to conflict with paragraph 5.1.1 of the CDS resolution, which specifies that the CDS document must be validated as applicable by:

“5.1.1 for landings of domestic product, an official of the flag Member or Cooperating Non-Member of the catching vessel or, when the fishing vessel is operating under a charter arrangement, by a competent authority or institution of the chartering Member or Cooperating Non-Member; and”

These potential ambiguities can be addressed by modifying the CMF form and its instructions to explicitly allow the validation of landings of domestic product transhipped at sea to occur at the time of landing rather than before transhipment.

4. Instructions for the transhipment section of a CMF form currently read:

“Certification by Master of Fishing Vessel (only required for transhipments at sea): In the case of transhipments at sea, the master of the fishing vessel shall complete this section, with his/her full name, signature and date (dd/mm/yyyy) to certify that the form correctly records the catch/harvest information.”

It appears to be an error that this instruction does not require the transhipment section to be filled out when transhipments take place in port. Therefore, the Secretariat recommends that this oversight be corrected by removing the current wording “only required for transhipments at sea”.

5. The CDS Resolution does not currently provide a means of recording information about tagged SBT which have been discarded or tags which have never been used and are discarded. The Secretariat recommends that in order to strengthen the CDS, and to account for all tags issued to Members, it would be appropriate for Members to submit details about discarded and/or unused tags to the Secretariat.

Section 2 of Appendix 2 of the Resolution (Minimum Procedural and Information Standards for CCSBT Member and Cooperating Non-Member Tagging Programmes) could be expanded to specify that information about discarded tags which should be submitted to the Secretariat annually on a fishing season basis.

The Secretariat would then record these tag numbers on the CDS database and report on any instances of these tags being used at a later date.

6. The CDS Resolution does not clearly specify the necessary attachments that need to be provided to the Secretariat when REEF forms are submitted. This can cause uncertainties to Members regarding documentation requirements. Further guidance in this area could be provided by modifying the instructions on the back of the REEF form itself.

B.CDS Resolution Items Referred by CCWG2 for Clarification and/or Amendment

The following items in the CDS Resolution were referred to CC8 for further discussion by the Second Meeting of the Compliance Committee Working Group (CCWG2). **Attachment B** contains the corresponding recommended changes to the resolution.

The Report of CCWG2 held in Canberra during May 2013 referred one item of the CDS Resolution to CC8 as a topic for discussion – refer to item 1 below.

CCWG2 also noted some cases where discussion and clarification of the proposed CDS Minimum Performance Requirements (MPRs) could lead to proposed amendments to the CDS Resolution – possible amendments discussed by CCWG2 are detailed in items 2 and 3 below:

1. Clarify which items actually constitute the CDS Resolution

CCWG2 discussed potential ambiguities between the text of the CDS Resolution itself and the CDS form instructions which are found on the back of CDS forms. In particular, there was discussion about whether the CDS Resolution includes all of the Resolution text, the attached forms and the form instructions, or only some of those items? For example, does the Resolution include only the Resolution text and the CDS forms, but not the CDS form instructions? The CCWG2 made no recommendation regarding this matter, however the Secretariat has proposed a recommendation at Attachment B.

2. Possible amendment to paragraph 1.2 of the CDS Resolution

There was discussion as to whether the following sentence in paragraph 1.2 of the CDS Resolution means that exports of SBT “cheek meat” are exempt from CDS documentation requirements:

“1.2 However, the exportation/import of fish parts other than the meat (i.e. head, eyes, roe, guts, tails) may be allowed without the document.”

CCWG2 recommended that cheek meat not be exempt from CDS documentation requirements and further recommended that if clarification is required a footnote could be added alongside the word “meat”.

3. Possible amendment to the Catch Tagging Form instructions of the CDS Resolution

CCWG2 identified that there is ambiguity in the Catch Tagging Form (CTF) instructions with respect to how to measure SBT fork length and their relationship with the text in the body of the CDS Resolution.

- a) The instructions on the back of the Catch Tagging Form (CTF) currently state:

“Enter the fork length of the fish, rounded to the nearest whole centimetre. Measure the straight line horizontal (not curved over body) length of the fish from the closed mouth to the fork of the tail before freezing and tailing as shown in the diagram below.”
- b) An accurate measure of fork length before freezing and tailing can be provided – either by:
 - directly measuring fork length before the SBT is frozen and tailed, or
 - by measuring the SBT after tailing (but before freezing), and then applying an appropriate conversion factor to convert the length measured after tailing to a length which would have represented fork length before the tailing occurred.

CCWG2 recommended the Compliance Committee should consider how measurement of fork length can be better clarified in the CDS Resolution. One option considered by CCWG2 is provided at **Attachment B**.

2. Transshipment at Sea Monitoring Program

Secretariat Role

The Secretariat maintains a record of carrier vessels authorised to receive transshipments at-sea. On receipt of updates, the Secretariat updates its internal database of authorised carrier vessels and the CCSBT web site. For transshipments involving SBT, the Secretariat receives and maintains records for observer deployment requests, transshipment declarations and observer reports from both the IOTC and ICCAT Secretariats.

A summary of transshipments according to transshipment declarations and observer reports, aggregated by flag and product type, during 2012 and the first half of 2013 (until 30 June 2013) is provided at **Attachment C** (Tables 1, 2 and 3). The Secretariat has not provided this summary on a vessel by vessel basis for confidentiality reasons, however this information is available if it is required by the Compliance Committee.

The tables provide information for all transshipment declarations, but in some cases the observer reports have not yet been received. Missing observer reports account for the large discrepancies between transshipment declarations and observer reported weights reported in Tables 1 and 2.

The following summarises the information received by the Secretariat:

- Observer deployment requests specifying that SBT was to be transhipped were received for 75% of the SBT transshipments in 2012. This is despite an initial perceived improvement reported last year (paper CCSBT-CC/1209/10 Rev 2) for the first half of 2012, where it was noted that 100% of deployment requests had been received to date.
- Observer deployment requests specifying that SBT was to be transhipped have so far been received for 51.4% of the SBT transshipments in 2013. Deployment requests are a key part of the effective operation of this program, and it is important to improve and maintain the percentage of deployment requests that are being received.
- The Secretariat received 48 transshipment declarations for transshipments totalling 746t during 2012, and has so far received 3 transshipment declarations totalling 32t for the first half of 2013.
- Observer reports were received for 72.9% of all 2012 transshipments. Of the observer reports received, approximately 82.9% contained estimates of the weights of SBT transhipped, while the remaining 17.1% did not provide specific information on SBT⁵.
- The Secretariat is working with IOTC and ICCAT to obtain outstanding observer reports in relation to the received transshipment declarations.
- Table 3 of **Attachment C** provides a summary of transshipment weights according to transshipment declarations, observer reports, and CDS information. To enable valid comparisons to be made, this table presents data for only those transshipments for which the Secretariat has received both transshipment declarations and observer reports, and has also been able to match these transshipments with CDS documents. The weights of transhipped SBT reported from these three sources differed from each other by 8.7% at the most.

⁵ This was generally due to the observer being unable to separately identify SBT during transfer to the carrier vessel.

Operational Issues

This year, the Secretariat has again observed the same main issue with operation of the Transshipment Resolution as noted at the Seventh meeting of the Compliance Committee (CC7):

1. Observers are often unable to separate species during transshipments. This is usually due to the fish being transhipped in frozen 'strings' containing a mix of species and also due to the speed of these transfers. These two factors often result in the observer report recording 'Mixed Tuna Species'. Where observers can separate SBT, they most commonly use one of two methods to identify SBT and estimate weights. Both of these methods rely on information provided by the fishing vessel:
 - Identify SBT by the presence of CCSBT tags that have been inserted by the fishing vessel;
 - Where SBT can be visibly identified in a transfer (often using the above method), observers commonly use an average weight, multiplied by the estimated number, to calculate a total weight. The average weight is generally calculated using weights and numbers of fish provided by the fishing vessel.

This situation has improved during 2012, potentially in response to the continued request by the CCSBT Compliance Committee that SBT should be transhipped separate to other tuna-like species where possible, in order to assist observers with identification. One area of improvement that the Secretariat noted is that IOTC Observer reports received during 2012 generally contained a specific section regarding transshipments of SBT. They also appeared to more accurately identify SBT and to include more detailed information about the transshipments.

Recommendations

The Secretariat has no recommendations for change, but would like to continue to emphasise the request made by the CCSBT Compliance Committee in 2010 that where possible, SBT should be transhipped separate to other tuna-like species, in order to assist observers with identification.

3. Vessel Monitoring System (VMS)

Secretariat Role

The Secretariat has no interaction with Members' Vessel Monitoring Systems.

4. Records of Authorised Vessels and Farms

Secretariat Role

The Secretariat receives updates to authorised farms and vessels approximately twice a week, with vessel updates containing from one to hundreds of vessels. On receipt of this information, the Secretariat updates its internal database of authorised vessels/farms as well as the CCSBT web site. Updated information is also shared with the joint tuna RFMOs' consolidated list of authorised vessels.

In addition, during 2012, the standard template for reporting farm authorisations was revised to more accurately align with the format used by Australia⁶. It was correspondingly updated on the CCSBT website.

⁶ Australia is currently the only Member/CNM with active farming operations

Operational Issues

The following item continues to be the main issue with the operation of the authorised vessel/farm resolutions that the Secretariat has observed since the Seventh meeting of the Compliance Committee (CC7):

1. There are some instances where vessels caught SBT and were not authorised at the time. Refer to paper CCSBT–CC/1310/04 for further details.

Note that initially an analysis of CDS documents indicated that the extent of this problem appeared to have improved significantly during 2012 and the first quarter of 2013. However, as already mentioned, Indonesia noted in its national report to the Extended Commission/CC8, that there were 360 vessels in its artisanal longline fleet (< 30GT) during 2012 that caught SBT but were not included in the CCSBT authorised vessel list.

Recommendations

There are no recommendations for change, but the Secretariat would like to note that, wherever possible, it is important that vessel authorisation renewals are submitted prior to current authorisations expiring.

Secretariat Recommended Changes to the CDS Resolution

Where practical, recommended changes to relevant parts of the CDS resolution are shown in tracked mode below.

1. Add a requirement more clearly defining how long original CDS documents need to be retained

6.1 Members, Cooperating Non-Members and OSECs shall retain all original CCSBT CDS Documents (or scanned electronic copies of the original documents) received by them for a minimum of 5 years after the most recent signed date on the form. Members, Cooperating Non-Members and OSECs shall also retain a copy of any CCSBT CDS Documents issued by them for a minimum of 5 years after the most recent issuing state/entity signed date on the form. Copies of these CDS Documents (except the Catch Tagging Form) shall be forwarded to the Executive Secretary on a quarterly basis.

2. Add a requirement that copies of any modified CDS forms are placed on the public area of the CCSBT website

6.4 The Executive Secretary will post on the public area of the CCSBT web site

a subset of the report comprising:

- Flag State/fishing entity;
- Harvest year;
- Product destination (including landings of domestic product);
- Gear code;
- Net weight;
- Estimated whole weight (calculated by applying a conversion factor to the net weight);
- copies of all modified CDS forms provided in accordance with paragraph 3.4.

3. Validation of transhipped, domestically landed SBT

The CMF form and associated instructions:

CMF Form:

“**Validation by Authority (not required for exports transhippedments at sea):** I validate that the above information is complete, true and correct to the best of my knowledge and belief.”

CMF Instructions:

“**Validation by Authority (not required for exports transhippedments at sea):** If this is not an export being transhippedment at sea, enter the name and full title of the official signing the document, together with the signature of the official, date (dd/mm/yyyy) and official seal. For SBT transhipped at sea and then landed domestically, validation should occur at the point of domestic landing (i.e. after transhipment).”

4. CMF Transhipment Section Instructions

CMF Instructions:

“**Certification by Master of Fishing Vessel** ~~(only required for transhipments at sea)~~: In the case of all transhipments ~~at sea~~, the master of the fishing vessel shall complete this section, with his/her full name, signature and date (dd/mm/yyyy) to certify that the form correctly records the catch/harvest information.”

5. Discarded Tags

CDS Resolution: Appendix 2

Minimum Procedural and Information Standards for CCSBT Member and Cooperating Non Member Tagging Programmes

2. Members and Cooperating Non-Members shall take steps to ensure that SBT tags cannot be re-used by implementing the following procedures for each fishing season:

a. Securely disposing of all unused tags,

b. Reporting to the Executive Secretary within 3 months after the completion of each fishing season the tag numbers of any:

- tagged SBT which were discarded overboard, or

- tags that were lost and/or not used.

6. REEF Form Document Submission Requirements

The first two paragraphs of the REEF form instructions could be modified to more clearly specify:

“This form must accompany all re-exports of SBT and all exports of SBT that have previously been landed as domestic product, and a copy must be provided to the issuing State/Fishing Entity.

One REEF form must be issued for:

- each CMF that was previously landed as domestic product but is now being exported, or
- each REEF shipment that was imported and is being re-exported, together with its previously associated REEF(s) and CMF(s).

In addition, ~~this~~each REEF form must be accompanied by a copy of the associated Catch Monitoring Form and copies of any previously issued Re-Export/Export after Landing of Domestic Product Forms for the SBT being exported.

.....”

CCWG2 Recommendations for Clarification and/or Potential Amendment of the CDS Resolution

1. Clarify which items actually constitute the CDS Resolution

The CCWG2 made no recommendation regarding this item, however the Secretariat suggests that for clarity, Section 1.1 of the Resolution is amended as follows:

“1.1 The CDS Resolution includes the main Resolution text, all of the appendices (including the attached CDS forms and the associated form instructions), and tagging of SBT. All Members and Cooperating Non-Members shall implement the CCSBT CDS for southern bluefin tuna (SBT) to document the movement of all SBT as outlined in this resolution. ~~The CCSBT CDS incorporates CCSBT CDS documentation and tagging of SBT.~~”

2. Possible amendment to paragraph 1.2 of the CDS Resolution

“1.2... . However, the exportation/import of fish parts other than the meat³ (*i.e.* head, eyes, roe, guts, tails) may be allowed without the document.”

Footnote:

“³ Any meat separated from fish parts is considered to be meat in this context.”

3. Possible amendment to the Catch Tagging Form instructions of the CDS Resolution

One option discussed at CCWG2 was to modify the instructions on the back of the CTF to read as follows:

“Enter the fork length of the fish, rounded to the nearest whole centimetre.

In cases where SBT can be measured at the time of kill:

Measure the straight line horizontal (not curved over body) length of the fish from the closed mouth to the fork of the tail before freezing and tailing as shown in the diagram below.

In cases where length cannot be measured at the measure of kill, but is instead measured upon landing, and after tailing and before freezing:

Measure the straight line horizontal (not curved over body) length of the fish from the closed mouth up to the point where the tail was removed, and then apply an appropriate conversion factor to this length measurement to convert it to a fork length measurement.”

Table 1: Summary of Transhipments at sea during the 2012 Calendar Year

Fishing Vessel Flag	From Transhipment Declarations			From Observer Reports	
	Number of Transhipments	Total Weight (kg) of SBT	Product Type	Number of Transhipments	Total Weight (kg) of SBT
Japan	33	538,197	GG	24	303,973
Taiwan	15	207,931	GG	11	140,105
TOTAL	48	746,128		35	444,078

Table 2: Summary of Transhipments at sea during the first half of the 2013 Calendar Year

Fishing Vessel Flag	From Transhipment Declarations			From Observer Reports	
	Number of Transhipments	Total Weight (kg) of SBT	Product Type	Number of Transhipments	Total Weight (kg) of SBT
Japan	3	31,971	GG	2	29,140
TOTAL	3	31,971		2	29,140

Table 3: Summary of Transhipments at sea versus CDS Forms versus Observer Reports for the 2012 Calendar Year⁷

Fishing Vessel Flag	Comment	Number of Transhipments	Total Weight (kg) from Transhipment Declaration	Total Weight (kg) from CDS	Total Weight (kg) from Observer Report
Japan	All data provided	16	304,802	278,059	297,577
Taiwan	All data provided	8	109,135	109,135	109,382
Japan	Observer report provided, no SBT weight specified	5	102,374	102,440	Weight not provided
Taiwan	Observer report provided, no SBT weight specified	1	9,428	9,428	Weight not provided
TOTAL		30	525,739	499,062	406,959

⁷ This report is limited to transhipments where observer reports have been provided, and where the Secretariat has been able to match CDS information