



CCSBT-CC/1510/08

Analysis of REEF Utilisation

1. INTRODUCTION

The Ninth Meeting of the Compliance Committee (CC9) requested that the Secretariat monitor how REEF forms are utilised, and report on its findings to CC10.

As requested by CC9, the Secretariat has carried out this monitoring exercise, and presents the following information in this paper:

- General background information on REEFs and their use;
- A summary of CDS REEF data submitted to the Secretariat to date;
- The number of CDS REEFs that list more than one preceding document number; and
- Timeframes between domestic landings subsequently exported on REEFs, or between imports subsequently re-exported on REEFs.

2. BACKGROUND

The Catch Documentation Scheme (CDS) Resolution (paragraph 6.3) requires that the Executive Secretary report on the data collected by the CCSBT CDS at six monthly intervals. The specific information that is required to be included in these reports is set out in Appendix 3 of the CDS Resolution.

One of the reports required is the Re-export/Export after Landing of Domestic Product Form (REEF) discrepancy report as described below (CMF means Catch Monitoring Form):

“This report should examine all REEF forms and associated CMFs, and produce a list of any CMF forms that have been “over utilised” in subsequent exports and re-exports.

The list should identify:

- *The document number, flag, product type(s) and weight(s) in each over utilised CMF form;*
- *The document number, exporting flag, product type(s) and weight(s) of the associated REEF form(s); and*
- *Other information agreed by the Compliance Committee.”*

Currently, the Secretariat is not able to run this REEF discrepancy report in order to detect any potential ‘over-utilisation’. This is because the existing report is not effective in cases where Members record more than one preceding document number on each REEF. There are many instances where this is occurring, and this issue was discussed at the Ninth Meeting of the Compliance Committee (CC9).

Members recognised that there are practical difficulties (for example, freezer storage) with respect to implementing the requirement of one preceding form number recorded per REEF form, but agreed not to amend the CDS Resolution at the time. Instead Members recommended that a longer term solution be sought intersessionally if the opportunity arises

¹ An over-utilised CMF is where subsequent exports/re-exports of fish from the CMF have exceeded the original quantity of fish reported on the source CMF.

(e.g. during a CDS review), and that in the meantime the Secretariat will monitor how REEF forms are utilised, and report on this to CC10.

3. GENERAL INFORMATION: REEFS

3.1 Preceding Document (Form) Number

On each REEF, Members are required to record the 'Form number of the preceding document'. The preceding document is the CMF or REEF that the SBT are recorded on immediately prior to them being (re-)exported on the current REEF. It is important that only one preceding document number is recorded in this field so as to facilitate analysis and maximise the possibility of detecting any over-utilisation problems.

Instructions for filling out the preceding document number field on the REEF currently read as follows:

Form number of Preceding Document: Enter the unique Document Number of the CDS form that precedes this. (Catch Monitoring Form or Re-Export/Export after Landing of Domestic Product Form).

3.1 Types of REEF

REEFs are used in one of the following two situations and so can be categorised into two basic types based on these situations:

- **Exports after Landing of Domestic Product (ELDP) REEFs**
These REEFs record details of SBT that were initially landed domestically by a Member (and recorded on a CMF), and are now being exported by that same Member. A copy of any preceding documents (always CMFs) must be attached to the REEF.
- **Re-export REEFs**
These REEFs record details about SBT that were first imported from another State/Fishing Entity and are now being re-exported by the importing Member. A copy of any relevant preceding documents (CMFs and/or REEFs), and in turn any of their preceding documents, must be attached to the REEF.

4. SUMMARY OF REEF DATA SUBMITTED TO THE SECRETARIAT

Between 2010 and 2014, only the following four Members have submitted REEFs to the Secretariat as follows:

- Australia
- Indonesia
- Japan
- Korea.

Tables 1 a) – c) provide a summary of the following information between 2010 and 2014² inclusive:

- the number REEFs (by type) submitted,
- the number of whole³ SBT re-/exported on REEFs, and

² REEFs are allocated to a year based on the REEF validation date year or REEF export certification date year, whichever is earlier.

³ According to REEF instructions, "whole" SBT include SBT with the product types of RD, GGO, GGT, DRO, DRT, and previously also GG and DR. SBT are considered to be whole despite cleaning, gilling and gutting, removing fins, operculae (gill plates/ covers) and tail, and removing the head or parts of the head. SBT with product types such as FL (fillet) or OT (Other – including belly meat, kama, nodo, loins and pieces) are not "whole" and so no values should be recorded in the export column "number of whole fish" (but sometimes are). If any values were recorded in this column for non-"whole" SBT, the Secretariat has not included these values in its summaries of the number of whole SBT re-/exported on REEFs. This means that Table 1a (next page) will include all the REEFs submitted to the Secretariat, whereas Table 1b will only include REEFs that had some whole SBT re-/exported on them.

- the net weight of SBT re-/exported on REEFs.

Each REEF was allocated to a specific year using the date which most closely approximates the actual re-/export date - either the REEF validation or REEF export certification date, whichever date was the earliest.

Table 1: Summary of all REEFs⁴ Submitted to the Secretariat Between 2010 and 2014

a) Number of REEFs Submitted²

Member	REEF Type	Number of REEFs Submitted					Total Number of REEFs Submitted by Member
		2010	2011	2012	2013	2014	
Australia	ELDP	414	190	64	74	79	821
	Re-export						
Indonesia	ELDP	26	1	28	3	22	80
	Re-export						
Japan	ELDP	12	2	3	23	34	687
	Re-export	112	85	116	159	141	
Korea	ELDP	1	0	0	0	0	19
	Re-export	3	0	2	2	11	
Total Number of REEFs submitted per Year		568	278	213	261	287	1607

b) Number of Whole³ SBT Re-/exported on REEFs²

Member	REEF Type	Number of whole ³ SBT Re-/exported on REEFs					Total Number of whole ³ SBT Re-/exported by Member
		2010	2011	2012	2013	2014	
Australia	Export (ELDP)	2,832	1,164	197	545	1,531	6,269
	Re-export						
Indonesia	Export (ELDP)	41	0	16	6	208	271
	Re-export						
Japan	Export (ELDP)	314	0	353	822	1,426	7,153
	Re-export	88	333	155	1,814	1,848	
Korea	Export (ELDP)	112	0	0	0	0	3,093
	Re-export	6	0	0	0	2,975	
Total number of whole³ SBT Re-/exported on REEFs		3,393	1,497	721	3,187	7,988	16,786

⁴ In cases where either only the export copy, or both exporter and importer copies of REEFs were submitted to the Secretariat, only the data on the exporter copy of the REEF is presented.

c) Net Weight (t) of SBT Re-/exported on REEFs²

Member	REEF Type	Net Weight (t) of SBT Re/exported on REEFs					Total Net Weight Re-/exported on REEFs by Member
		2010	2011	2012	2013	2014	
Australia	Export (ELDP)	108.22	55.60	9.23	23.87	74.72	271.64
	Re-export						
Indonesia	Export (ELDP)	14.75	0.10	13.02	6.13	25.01	59.02
	Re-export						
Japan	Export (ELDP)	28.44	0.59	15.60	55.95	91.86	921.81
	Re-export	88.49	76.04	94.24	252.24	218.35	
Korea	Export (ELDP)	9.79	0	0	0	0	142.61
	Re-export	6.59	0	13.32	2.41	110.51	
Total net weight of SBT Re-/exported on REEFs		256.28	132.33	145.41	340.61	520.45	1,395.08

The results presented in Tables 1 a) – c) illustrate that:

- Australia/Japan are the biggest users of REEFs in terms of both the numbers and volume of SBT recorded on them;
- To date, Australia and Indonesia have only used REEFs to record exports of SBT initially landed domestically and then later exported. They have not used REEFs to re-export any imported product;
- Japan commonly uses REEFs to both re-export domestically landed product and SBT product imported from other Members/ CNMs;
- Since 2011 Korea has only used REEFs to re-export imported SBT;
- Indonesia and Korea have submitted relatively few REEFs (80 and 19 respectively) over the past five years.

Annual Summary

Table 2 below provides a concise annual summary of the same information in Table 1c, and compares it to the overall catch/ harvest of SBT in any year between 2010 and 2014. The first two columns in this table are calculated independently, so, for example, the SBT re-/exported in 2010 do not need to be associated with any of the SBT recorded as caught/harvested on 2010 CMFs.

Table 2: Percentage of Catch/Harvest Net Weight (Re-)Exported on REEFs per Annum

Year	Total net weight (t) of SBT caught/ harvested (as recorded on all CMFs submitted for the year) ⁵	Total net weight (t) of SBT re-/exported (as recorded on all REEFs submitted for the year) ²	Percentage of SBT Net Weight (t) that is Re-/exported on REEFs Each Year Compared to the Weight Recorded on CMFs submitted for the Same Year
2010 ⁶	12,309.49	256.28	2.08%
2011	11,620.54	132.33	1.14%
2012	12,149.09	145.41	1.20%
2013	13,815.19	340.61	2.47%
2014	15,321.89	520.45	3.40%

⁵ The net weights recorded here include the weights of fattened SBT harvested from Australian farms because fattened weights are recorded on CMFs (and not the weights of these SBT when they are first caught as part of Australia's allocation and before being transferred to farms). Therefore, total annual net weights presented in this table may be significantly larger than the corresponding annual TAC for SBT.

⁶ 2010 data may be atypical due to it being the first year of operation of the CDS.

Table 2 illustrates that in general, the net weight of SBT (re-)exported each year compared to the net weight caught/ harvested from farms, is relatively small (between 1% and 3.5%). From 2011 onwards, there seems to be a small trend of both increased catches/SBT harvested each year and an increase in the net weight of SBT being re-/exported on REEFs each year.

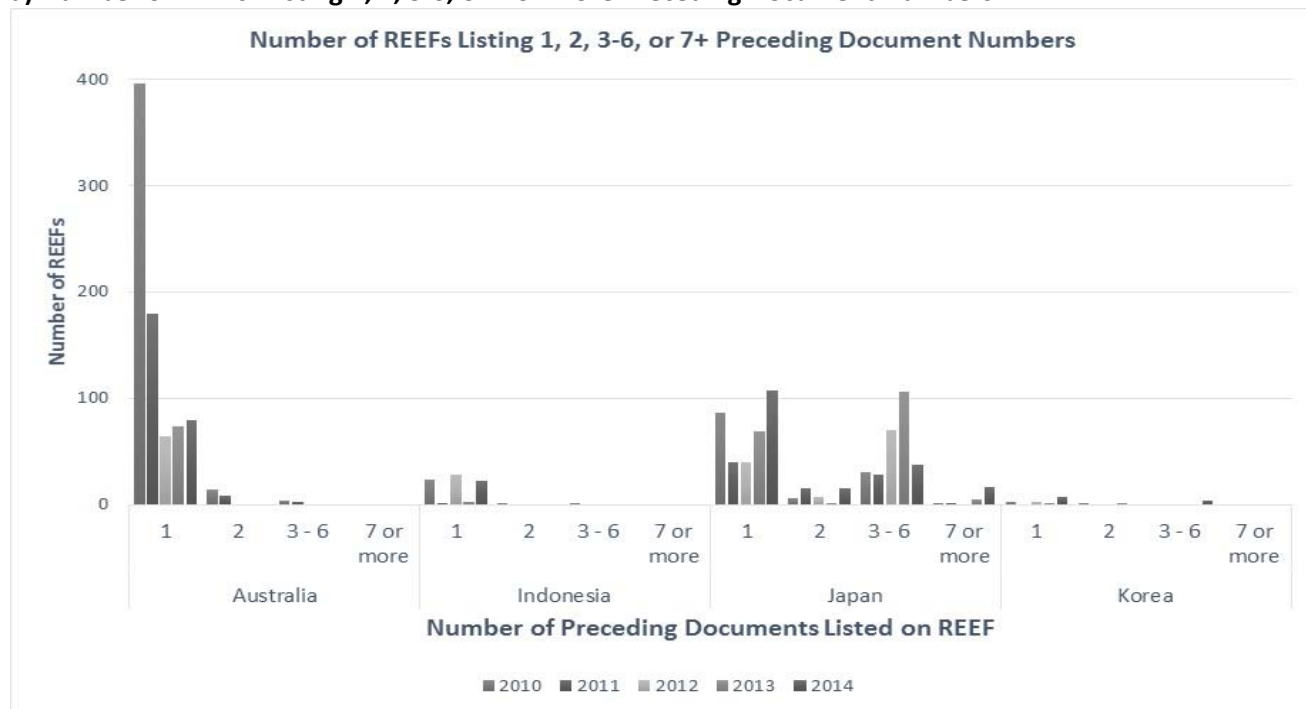
5. NUMBER OF PRECEDING DOCUMENT NUMBERS RECORDED PER REEF

The Secretariat conducted some analyses to illustrate how many preceding document numbers have been recorded per REEF by Member between 2010 and 2014 inclusive. As mentioned earlier, any over-utilisation of SBT product can become very difficult or impossible to detect in cases where more than one preceding document number is recorded per REEF.

Tables 1a) presents the *number* of REEFs listing 1, 2, 3-6, or 7 or more preceding document numbers per Member per annum. Table 1b presents a similar analysis, but instead shows the *net weights* (t) of SBT being re-exported on REEFs listing 1, 2, 3-6, or 7 or more preceding document numbers per Member per annum.

Figure 1:

a) Number of REEFs⁷ Listing 1, 2, 3-6, or 7 or More Preceding Document Numbers



⁷ REEFs that were submitted to the Secretariat but that did not include any information on preceding document numbers are not included in this analysis.

b) Net Weights of SBT on REEFs⁷ Listing 1, 2, 3-6, or 7 or More Preceding Document Numbers

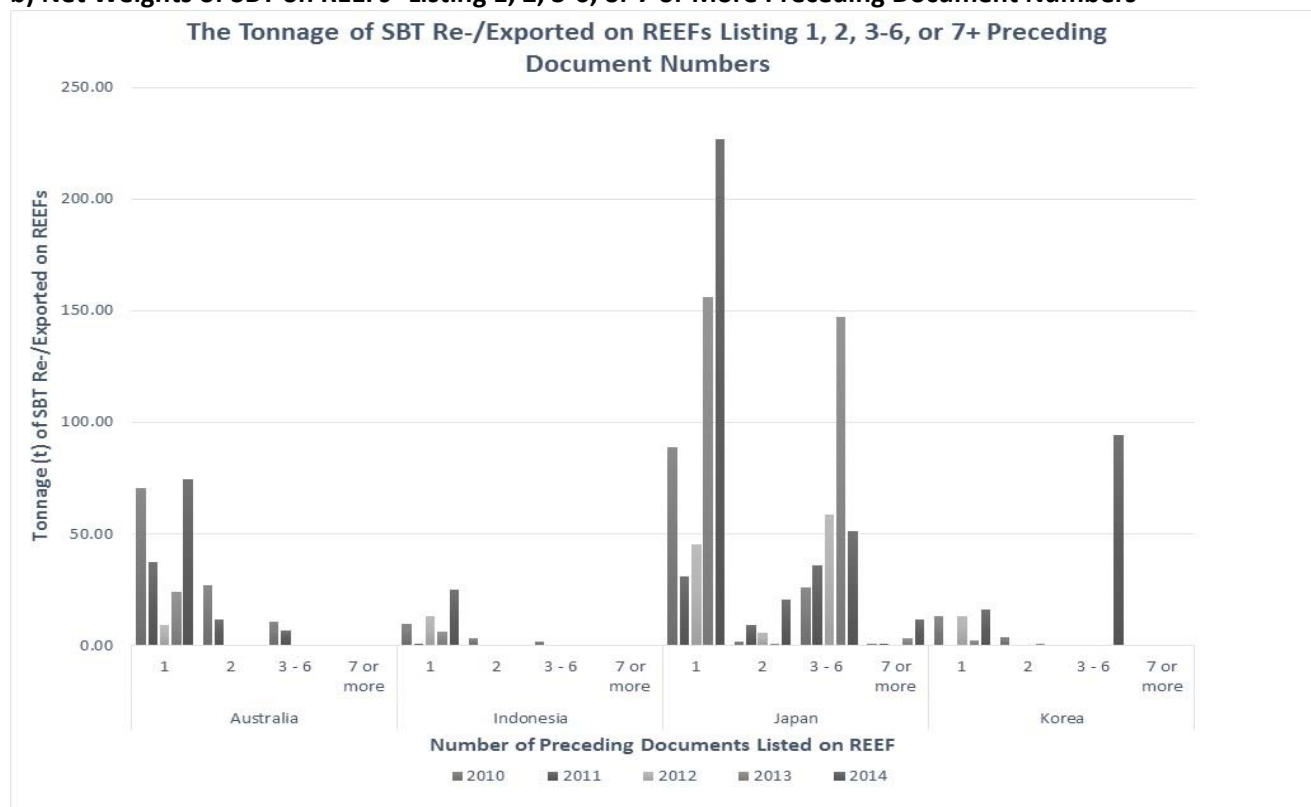


Table 3: Percentage of REEFs⁷ Listing 1, 2, 3-6 or 7 or More Preceding Document Numbers Between 2010-2014 Inclusive

Percentage of REEFs Listing 1, 2, 3-6 or 7 or More Preceding Document Numbers Between 2010 -2014 Inclusive			
Member	Total No. REEFs included in this Analysis	Number of Preceding Document Numbers	Percentage
Australia	820	1	96.59%
		2	2.68%
		3 - 6	0.73%
		7 or more	0.00%
Indonesia	80	1	97.50%
		2	1.25%
		3 - 6	1.25%
		7 or more	0.00%
Japan	681	1	50.22%
		2	6.46%
		3 - 6	39.94%
		7 or more	3.38%
Korea	19	1	68.42%
		2	10.53%
		3 - 6	21.05%
		7 or more	0.00%

Figure 1 (a and b) and Table 3 illustrate that between 2010 and 2014:

- In excess of 96% of all REEFs submitted by both Australia and Indonesia list only 1 preceding document number;
- Australia submitted 28 REEFs listing more than 1 preceding document number between 2010 and 2014 inclusive – all of these were in 2010 and 2011;
- Indonesia submitted only 2 REEFs (in 2010) listing more than 1 preceding document number;

- Japan has consistently recorded multiple preceding document numbers (CMF and/or REEF numbers) on REEFs in each year since the CDS was implemented in 2010, and a correspondingly large tonnage of SBT was re-/exported on these REEFs. In total, 49.8% of all CDS REEFs submitted to the Secretariat list more than one preceding document number, and 43.32% list 3 or more preceding document numbers. Of the REEFs that record more than one preceding document number, the median number of preceding documents recorded per REEF is 4; and
- Korea has submitted 19 REEFs to the Secretariat between 2010 and 2014, but 31.58% (6) of those REEFs list more than one preceding document number. Generally only a relatively small proportion of the SBT catch has been re-/exported on REEFs that list more than 1 preceding document number, except for in 2014, when 94.27t of SBT was re-exported on 4 REEFs which all listed the same 6 preceding document numbers.

6. TIMEFRAMES BETWEEN IMPORT (Certification) AND RE-/EXPORTATION

One matter to consider when checking for potential over-utilisation of re-/exports is that there is uncertainty regarding how long SBT may be kept in freezer storage before being re-/exported. Long storage periods could add another dimension of difficulty with regard to detecting over-utilisation. For example, it's possible that SBT from one source CMF/REEF could be re-/exported over several years, and that over-utilisation analyses should therefore include checking at least several years into the future.

The Secretariat carried out some simple analyses to try to characterise re-/export timeframes for relevant Members with respect to:

- a) SBT landed domestically and then re-exported, and
- b) SBT imported and then re-exported.

6.1 Number of Days Between Domestic Landing and then Subsequent Export

Tables 4a) -e) present the following results:

- The minimum, median and maximum time (in days) between the initial domestic landing and subsequent export on a REEF.

Table 4: Number of Days Between Domestic Landing and Export

a) 2010

Member	No. of REEF/Preceding Document Number Comparisons ⁸	Number of days between the domestic landing ⁹ of SBT and the REEF export date ¹⁰		
		Minimum	Median	Maximum
Australia	427	0	0	256
Indonesia	29	2	26	97
Japan	12	9	68	769
Korea	1	42	42	42

⁸ This figure represents 'n', i.e. the total number of REEF/preceding document number comparisons that were made. Note that where a REEF lists 3 preceding document numbers, then 3 separate comparisons were made.

⁹ The Secretariat calculated this difference as the number of days between the 'Date of previous Import/Landing' as recorded on the REEF and the re-/export date (represented by either the REEF validation or REEF export certification date, whichever is earlier).

¹⁰ The closest approximation to the actual re-/export date is represented by either the REEF validation or REEF export certification date, whichever is earlier.

b) 2011

Member	No. of REEF/Preceding Document Number Comparisons ⁸	Number of days between the domestic landing ⁹ of SBT and the REEF export date ¹⁰		
		Minimum	Median	Maximum
Australia	202	0	0	275
Indonesia	1	27	27	27
Japan	2 ¹¹	900 ¹¹	961 ¹¹	1022 ¹¹

c) 2012

Member	No. of REEF/Preceding Document Number Comparisons ⁸	Number of days between the domestic landing ⁹ of SBT and the REEF export date ¹⁰		
		Minimum	Median	Maximum
Australia	64	0	0	216
Indonesia	22	2	13	89
Japan	3	54	62	453

d) 2013

Member	No. of REEF/Preceding Document Number Comparisons ⁸	Number of days between the domestic landing ⁹ of SBT and the REEF export date ¹⁰		
		Minimum	Median	Maximum
Australia	74	0	1	298
Indonesia	3	0	26	79
Japan	23	24	117	403

e) 2014

Member	No. of REEF/Preceding Document Number Comparisons ⁸	Number of days between the domestic landing ⁹ of SBT and the REEF export date ¹⁰		
		Minimum	Median	Maximum
Australia	78	0	0	32
Indonesia	22	2	15	408
Japan	38	16	187	399

Table 4 (a – e) illustrates that for landed domestic product subsequently exported on REEFs:

- For Australia, SBT initially landed as domestic product is usually exported on REEFs on the same day (median number of days equals 0 for 2010 – 2012 and 2014, and 1 for 2013). However, recorded maximum timeframes between domestic landing and subsequent export range between 32 (in 2014) – 298 days;
- For Indonesia, there is a gap of 0 - 4 weeks (minimum numbers of days are 1 - 29, and median number of days 13 – 27) between the initial landing of SBT of domestic product and its subsequent export on REEFs; maximums of 27 to 408 days before SBT is exported on REEFs are recorded;

¹¹ The results presented in this row are from only 2 date comparisons and are therefore not likely to be typical of an average year where many more records were compared.

- For Japan, there are no instances recorded where the SBT landed domestically is then immediately exported on REEFs, *i.e.* there are no instances where the minimum number of days equals zero. The minimum number of days recorded between a domestic landing of SBT and its subsequent export on a REEF is generally between 9 and 54 days. This is except for in 2011 where there were only 2 records, and the minimum number of days recorded was 900 (2.5 years), and the maximum number of days recorded was 1022 days (2.8 years). Otherwise the median number of days before export ranges between 62 (in 2012) and 187 in 2014. With the exception of the maximum 1022 days recorded in 2011, the more typical maximum number of days until subsequent export ranges between 399 – 769 days;
- There is only one result recorded for Korea for a landing of domestic product in 2010, and the number of days between domestic landing and subsequent export on a REEF was 42 days.

6.2 Number of Days Between Import Certification/Clearance and Re-export

Tables 5a) - e) present the following results:

- The minimum, median and maximum time (in days) between import certification/clearance and the approximate date of re-export.

Table 5: Number of Days Between Import Certification/Clearance¹² and Re-export

a) 2010

Member	No. of REEF/Preceding Document Number Comparisons	Number of days between the date the import was certified/cleared ¹² and the date it was re-exported ¹⁰		
		Minimum	Median	Maximum
Japan	201	14	548	1,019
Korea	4	86	378	402

b) 2011

Member	No. of REEF/Preceding Document Number Comparisons	Number of days between the date the import was certified/cleared ¹² and the date it was re-exported ¹⁰		
		Minimum	Median	Maximum
Japan	173	37	377	1,158

c) 2012

Member	No. of REEF/Preceding Document Number Comparisons	Number of days between the date the import was certified/cleared ¹² and the date it was re-exported ¹⁰		
		Minimum	Median	Maximum
Japan	325	41	370	1,525
Korea	2	15	18	21

¹² The Secretariat calculated this difference as the number of days between the 'Date of previous Import/ Landing' as recorded on the REEF and the re-/export date (represented by either the REEF validation or REEF export certification date, whichever is earlier). The Secretariat consulted with both Japan and Korea and found that for re-exports, the date that is recorded as the date of 'Previous/Import Landing' on the REEF usually represents the date that the import was certified/cleared by the Member's own customs agency.

d) 2013

Member	No. of REEF/Preceding Document Number Comparisons	Number of days between the date the import was certified/cleared ¹² and the date it was re-exported ¹⁰		
		Minimum	Median	Maximum
Japan	595	12	325	1,709
Korea	3	12	199	199

e) 2014

Member	No. of REEF/Preceding Document Number Comparisons	Number of days between the date the import was certified/cleared ¹² and the date it was re-exported ¹⁰		
		Minimum	Median	Maximum
Japan	381	3	329	941
Korea	31	1	77	424

Table 5 (a – e) illustrate that for Japan and Korea’s re-exports of previously imported SBT product:

- To date, there has always a time lag between the date of import and the re-export date, with the minimum number of days’ difference ranging between 3 – 86 days.
- The minimum number of days per annum between import and re-export for Japan are 14, 37, 41, 12 or 3 days and for Korea are 86, 15, 12 or 1 day;
- The median number of days between import and re-exportation is relatively long: 548, 377, 370, 325 and 329 days for Japan, and 378, 18, 199 and 77 days for Korea; and
- To date, no SBT have been re-exported more than 1709 days (4.7 years) after either domestic landing or importation.

7. DISCUSSION

REEFs that Refer to Only One Source/Preceding Document

In situations where it is known that each REEF refers to only one source/preceding document (whether this be a CMF or REEF) and no other REEFs refer to the same source/preceding document, it is relatively simple to check for the occurrence of over-utilisation. Importing Members/CNMs can easily compare the weights recorded on the REEF versus the attached preceding CMF or REEF, and determine whether the amount of SBT being re-exported exceeds the amount of SBT on the source document. Therefore, in these sorts of cases there is a much lower risk of failing to detect over-utilisation.

However, several different REEFs could refer to the same single source/ preceding document, and with the current paper-based CDS, this cannot be known in advance by importers when they are checking CDS import documents. In these types of cases, the Secretariat can check for over-utilisation once all the documents have been submitted to the Secretariat¹³.

¹³ Although some inaccuracies will occur through the use of conversion factors with different product types; in addition, it will be difficult to know if in fact all REEFs that will reference the particular source/preceding document have been received or not at the point in time the analysis is done.

REEFs that Refer to More than One Source/Preceding Document

In cases where individual REEFs refer to more than one source/preceding document, and potentially these same multiple source/preceding document numbers are also referenced by other REEFs, then if over-utilisation has occurred, there is a greater risk that it may not be detected. That's because analyses to try to detect any over-utilisation in these situations become very complex very quickly.

For example, it will be much more difficult to detect any potential over-utilisation problems for Japanese and Korean REEFs that list more than one source/preceding document number, especially if these multiple source/preceding document numbers are also listed as source/preceding document numbers by other REEFs.

Over-Utilisation Analyses

This year the Secretariat was not able to successfully conduct more complex utilisation analyses in cases where:

1. Different REEFs refer to the same single source/preceding document number, and/or
2. REEFs refer to more than one source/preceding document.

For the first case, the Secretariat needs to do further work in relation to conversion factors and primary/secondary states of SBT before the analysis can be automated sufficiently for it to be practical. For the second case, the Secretariat does not consider that it will be able to determine the likelihood or level of over-utilisation due to the level of complexity of the analyses involved. A better solution is not to allow REEFs to be associated with more than one preceding document.

Prepared by the Secretariat