



CCSBT-CC/1910/10

Potential Non-Member Fishing Activity & Trade/ Emerging Markets 非メンバーによる漁業活動及び貿易／市場形成の可能性

1. Introduction

序論

This paper provides:

本文書では以下の情報を提供する。

- China's response regarding the Ping Tai Rong Fleet activities in 2018;
2018 年の Ping Tai Rong 船団の活動に関する中国の回答
- A note about the Secretariat's contingency fund with Trygg Mat Tracking;
Trygg Mat Tracking にかかる事務局の臨時資金に関する注記
- A summary of the Secretariat's research into alternative sources of trade data to the Global Trade Atlas (GTA);
グローバル・トレード・アトラス (GTA) に替わる貿易データソースに関する事務局の調査結果の概要
- A summary of relevant correspondence about trade with Non-Cooperating Non-Members (NCNMs); and
貿易に関する非協力的非メンバー (NCNM) とのやりとりの概要
- A brief summary of SBT trade information between 2016 and 2018 based on the United Nations (UN) COMTRADE database.
国連 (UN) COMTRADE データベースに基づく 2016 年から 2018 年までの SBT 貿易情報の概要

2. Potential Non-Member Fishing Activity

非メンバーによる漁業活動の可能性

Chinese Flagged Vessels in the Southern Indian Ocean

南インド洋における中国船籍漁船

In July 2018, the Indian Ocean Tuna Commission (IOTC) Secretariat advised the CCSBT Secretariat that an observer alleged SBT were being transhipped to the Chinese-flagged Carrier Vessel Ping Tai Rong Leng2 (PTRLeng2) by seven Chinese-flagged Ping Tai Rong (PTR) fleet longliners. Based on the observer's deployment report, the IOTC wrote a letter to its Chinese Commissioner (refer to **Attachment A** – letter dated 1 September 2018, in copy to CCSBT).

2018 年 7 月、インド洋まぐろ類委員会 (IOTC) 事務局は CCSBT 事務局に対し、中国船籍 Ping Tai Rong (PTR) 船団のはえ縄漁船 7 隻から中国船籍運搬船 Ping Tai Rong Leng 2 (PTRLeng2) に対して SBT が転載されたとオブザーバーが申し立てたことを通知した。オブザーバー配乗報告書に基づき、IOTC は、同委員会の中国コミッショナーに対して書簡を送付した（別紙 A を参照。文書は 2018 年 9 月 1 日付となっており、CCSBT にも写しが送付された）。

This letter was received by China before PTRLeng2 arrived into its home port in Zhoushan where it was expected to unload. It reiterated the observer's allegations that multiple transshipments of southern bluefin tuna incorrectly labelled as yellowfin tuna had occurred from a number of PTR longliners. In total the observer estimated there were a minimum of 180 SBT present in the last five transshipments received by PTRLeng2

同書簡は、PTRLeng2 が荷降ろしを行うと想定された舟山の母港に到着する前に中国により受領された。同書簡は、複数の PTR はえ縄漁船から、きはだとして不正に分類されたみなみまぐろの転載が複数回行われたとしてオブザーバーが提起した疑義について述べたものであった。オブザーバーによる推定を合計すると、PTRLeng2 が受領した最後 5 回の転載において、最低でも 180 尾の SBT が含まれていた。

Follow-up by CCSBT

CCSBT によるフォローアップ

Immediately upon receipt of the IOTC's letter (detailing the transshipment observer's findings), the CCSBT Secretariat followed up with its own letter to the IOTC's Chinese Commissioner which is provided at **Attachment B**.

CCSBT 事務局は、IOTC の書簡（転載オブザーバーによる所見を詳述したもの）を受領した直後に、別紙 B に示した CCSBT としての書簡により IOTC の中国コミッショナーに対してフォローアップを行った。

China provided a brief email response to the CCSBT's letter noting that,

".... internal investigation both on the fishing vessels and carrier vessel, as well as the vessel owner/the fishing company, would initiate as the carrier vessel calls Chinese port" and,

"we will come back to the IOTC and CCSBT with the outcome of the investigation and the actions against the vessel owner when all necessary procedures are finished by this side."

中国は、CCSBT のレターに対して簡潔な電子メール（別紙 C を参照）により回答し、「・・・運搬船が中国の港に寄港した際、漁船及び運搬船、並びに船主／漁業会社に対する内部調査に着手する・・・」とともに、「当方における必要な全プロセスが完了した際には、調査の結果、及び船主に対してとられた行動について IOTC 及び CCSBT に報告する」とした。

The above information was reported to the October 2018 meetings of the Compliance Committee (CC) and Extended Commission (EC).

上記の情報については、2018 年 10 月の遵守委員会（CC）及び拡大委員会（EC）会合に対して報告された。

Response from China

中国からの回答

China did not respond to the CCSBT on this matter but did provide a response to IOTC's Executive Secretary dated 8 March 2019. That response is provided at **Attachment C**. In China's letter to IOTC, China notes it carried out an investigation of the PTRLeng2 on 06/09/18 in Zhoushan and called all seven of the PTR longliners concerned back to port for further investigation. The longliners did not arrive in Zhoushan until 7 and 8 October 2019. China reported that the resulting investigation indicated that, *"no bluefin tuna was found during the investigation"*, and, *"there is no evidence indicating that Ping Tai Rong Leng 2 has conducted illegal transshipment at sea of the southern bluefin tuna"*.

中国は、本件に関して CCSBT には回答しなかったが、2019 年 3 月 8 日付で IOTC 事務局長に対して回答した。当該回答書は別紙 C のとおりである。IOTC に対する中国の回答書では、中国は 2018 年 9 月 6 日に舟山において PTRLeng2 に対する捜査を行ったこと、及びさらなる調査のために全 7 隻の PTR はえ縄漁船に対して帰港命令を出したことを述べた。はえ縄漁船は 2019 年 10 月 7 日及び 8 日まで到着しなかつ

た。中国は、調査の結果として「調査においてみなみまぐろは確認されなかった」こと、及び「*Ping Tai Rong Leng 2* が違法にみなみまぐろの洋上転載を行ったことを示す証拠はなかった」ことを報告した。

3. Contingency Fund with Trygg Mat Tracking (TMT)

Trygg Mat Tracking (TMT) への臨時資金

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 during 2019, and therefore the operating fund has not yet been utilised.

2018 年において、CCSBT 25 は、2019 年の SBT 漁場における疑義のある漁業活動に関して事務局に提供される可能性がある報告のフォローアップのために自動船舶識別装置（AIS）データの解析及び船舶会社の関係性の精査を臨時的に行うべく、事務局が Trygg Mat Tracking (TMT) と契約するための少額予算（20,000 豪ドル）を措置することに合意した。これらのサービスに関する契約は 2019 年 2 月 1 日に締結され、CCSBT からの解析要請に備えて運用資金を保持しておくため、TMT に対する第一回目の支払い（9,969 豪ドル（7,000 米ドル））を行った。2019 年に関して、今日まで TMT による臨時解析の実施要請は行われておらず、よって運用資金はまだ活用されていない。

4. Trade and Emerging Markets

貿易及び市場形成

4.1. Background

背景

The EC of CCSBT 25 requested the Secretariat investigate alternative sources of trade data statistics because some Members were concerned as to whether the Global Trade Atlas (GTA) could be considered an official information source.

CCSBT 25 に付属する EC は、一部メンバーがグローバル・トレード・アトラス（GTA）を公式の情報ソースと見なすことができるのかどうかにかかる懸念を示したことを受けて、事務局に対し、貿易データ統計に関する代替的なソースについて調査するよう要請した。

In addition, the 13th meeting of the Compliance Committee (CC13) requested that the Secretariat contact Lebanon and Jordan to advise that CDS documents should accompany SBT imports. CC13 also requested that Members and Non-Members investigate likely errors in the Global Trade Atlas relevant to them and report back, more specifically:

さらに、第 13 回遵守委員会会合（CC 13）は、事務局に対し、輸入 SBT には CDS 文書を伴う必要があることを助言すべくレバノン及びヨルダンに連絡するよう要請した。また CC 13 は、メンバー及び非メンバーに対し、それぞれに関連するグローバル・トレード・アトラス上のエラーと考えられるものについて調査し、結果を報告するよう要請した。具体的には以下のとおり。

- Australia, the EU and the USA indicated that they would investigate the issues relevant to them and report back;
オーストラリア、EU 及び米国は、それぞれに関わる問題について調査を行い、結果を報告する意向を示した。
- The EU was to investigate an apparent export of 18t of SBT from Spain to Italy, reported in the GTA database and advise the Secretariat; and
EU は、GTA データベースで報告されているスペインからイタリアへの SBT 18 トンの輸出に関して調査し、事務局に対して通報する予定である。
- Indonesia noted the under-representation of its SBT exports in the GTA database compared to CDS figures and was to contact the relevant Indonesian authorities to resolve the under-representation of Indonesia SBT exports in the GTA database compared to CDS figures.
インドネシアは、同国の SBT 輸出量が CDS 上の数字に比べて GTA データベースでは過小になっていることに留意し、この問題を解決するべくインドネシアの関係当局に連絡する予定であると述べた。

The EU provided a response concerning its trade data on 25 January 2019 and this was communicated to all Members in CCSBT Circular #2019/006 (extract at **Attachment D**).
EU は、貿易データに関して 2019 年 1 月 25 日に回答し、CCSBT 回章#2019/006 により全メンバーに通報された（別紙 D に抜粋）。

4.2 Communications with Non-Cooperating Non-Members (NCNMs)

非協力的非加盟国（NCNM）との連絡

During 2019 the Secretariat has made contact with various NCNMs concerning trade and CDS queries.

2019 年において、事務局は、貿易及び CDS 関連の質問について様々な NCNM との連絡を行った。

Canada

カナダ

The Secretariat has established contact with relevant officials at Fisheries and Oceans, Canada and is still progressing queries regarding reported SBT imports into Canada.
事務局は、カナダの漁業及び海洋関連担当者との連絡ルートを樹立し、カナダへの SBT 輸入の報告に関するやりとりを進めているところである。

Lebanon and Jordan

レバノン及びヨルダン

CC13 tasked the Secretariat with contacting Lebanon and Jordan to advise that CCSBT's CDS documents should accompany any imports of SBT. The Secretariat tried to contact both Lebanon and Jordan in April and May 2019.

CC 13 は、事務局に対し、全ての SBT の輸入には CCSBT の CDS 文書を伴う必要があることを通知するため、レバノン及びヨルダンに連絡するとの任務を課した。事務局は、2019 年 4 月及び 5 月にレバノン及びヨルダン両国への連絡を試みた。

The Secretariat successfully conveyed some initial information about the CDS to Lebanon and received an acknowledgement in due course. As suggested by a Lebanese official, the Executive Secretary then wrote an official letter to Lebanon (**Attachment E**) requesting that it consider:

事務局は、レバノンに対して CDS に関するいくつかの初期情報を伝達することに成功し、これにかかる受領確認を得た。レバノンの担当者からの提案に従い、事務局長は、レバノンに対して以下を検討するよう要請する公式書簡（別紙 E）を送付した。

- not accepting imports of SBT product into Lebanon if unaccompanied by appropriate CDS documentation, and
適切な CDS 文書が添付されていない場合、レバノンへの SBT 製品の輸入を許可しないこと
- voluntarily sharing with the CCSBT any CDS documents received as well as SBT trade information.
受領した CDS 文書並びに SBT 貿易情報について、自主的に CCSBT と共有すること

No official acknowledgement or response has been received to this letter and the Secretariat's contact in Lebanon¹ has suggested that the Secretariat follow up with a second letter.

本文書に対する公式の受領確認又は回答は得られておらず、レバノンの連絡先担当者¹は、事務局からの第二の書簡によりフォローアップを行うことを提案している。

It was difficult to identify a relevant contact in Jordan and four email communications about CCSBT's CDS to a listed United Nations Food and Agriculture Organisation (UN FAO) representative to Jordan were not acknowledged. Therefore, the Secretariat cannot confirm whether information concerning CCSBT's CDS was received by Jordan.

ヨルダンの関係連絡先を特定することは困難で、国連食糧農業機関（UN FAO）の名簿のヨルダン代表に対して CCSBT の CDS に関する電子メールによる連絡を 4 度試みたが、受領確認が得られていない。このため、事務局は、CCSBT の CDS に関する情報がヨルダンによって受領されたのかどうかを確認することができない。

Mauritius

モーリシャス

Last year's summary of trade (refer to paper CCSBT-CC/1810/20) indicated that in 2016 and 2017 Mauritius had imported 1.61t and 2.02t of SBT from China respectively. The Secretariat contacted Mauritius and it advised that, “...no such imports are found in our records. It could probably be an error in misreporting or typing of HS Code.”

去年の貿易データの概要（文書 CCSBT-CC/1810/20 を参照）では、モーリシャスが中国から、2016 年及び 2017 年にそれぞれ 1.61 トン及び 2.02 トンの冷凍 SBT を輸入したことを記録している。事務局から本件についてモーリシャスに連絡したところ、同国は「我が国の記録ではそうした輸入は確認されない。誤報告又は HS コードの誤入力によるエラーである可能性がある」と回答した。

Namibia

ナミビア

During May 2019 Namibia made initial contact with the CCSBT Secretariat noting that:

¹ 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

“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.”

2019 年 5 月にナミビアから CCSBT 事務局に対して、「我が国漁船のうち 1 隻が南半球において操業しており、いくらかのみなみまぐろを捕獲している。我が国からこれらのみなみまぐろを輸出するための手続きについて確認したい」とする初めての連絡があった。

Namibia has subsequently confirmed that:

その後、ナミビアは以下を確認した。

“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、まだみなみまぐろの水揚げは行っていない。当方は、我が国管理部門と将来における我が国の委員会加盟について検討中であり、同管理部門による承認が得られれば、貴方より示された加盟手続きに従う。」

On contacting ICCAT about Namibia, ICCAT confirmed that Namibia has declared catches of SBT to it for 3 separate years: 1t (2005), 13t (2014) and 17t (2016).

ナミビアに関して ICCAT に連絡したところ、ICCAT は、ナミビアが同委員会に対して過去別々の 3 年にそれぞれ 1 トン（2005 年）、13 トン（2014 年）及び 17 トン（2016 年）の SBT の漁獲を申告したことがある旨を確認した。

4.3 New Source of Trade Statistics (UN COMTRADE)

貿易統計にかかる新たなソース (UN COMTRADE)

The Secretariat conducted a search for sources of trade data other than the Global Trade Atlas (GTA) and concluded that the UN COMTRADE database may potentially be an alternative and cost-effective² option from which to source data for preparing future trade summaries. 事務局は、グローバル・トレード・アトラス以外の貿易データソースに関する調査を行い、将来的に貿易データの概要を作成するためのデータを入手するための代替的かつ費用対効果の高い² オプションとして UN COMTRADE データベースが有望であるとの結論に至った。

The Secretariat checked the trade figures reported by the GTA database versus the COMTRADE database for the period 2015 to 2017 inclusive. As at January 2019, the total trade by product and Member were quite similar between the two databases. Out of a total of 231 tonnage values compared between the GTA and COMTRADE databases, 93% were the same, 3.5% differed by between 2t to 20t, and 3.5% differed by 20t or greater.

事務局は、2015 年から 2017 年の期間について GTA データベースに報告された貿易量に対応する COMTRADE データベースの数字について確認した。2019 年 1 月時点では、製品別・メンバー別の総貿易量は 2 つのデータベース間で極めて類似していた。GTA と COMTRADE データベース間で比較した合計 231 種類の数字（トン数）のうち、93 % が同じ、3.5 % では 2 トンから 20 トンの違い、3.5 % では 20 トン以上の違いであった。

The Secretariat also checked COMTRADE's data sources for each of CCSBT's Members as well as for some common Non-Cooperating Non-Member (NCNM) trading partners. A table of COMTRADE listed data sources is provided at **Attachment F**. To the best of the Secretariat's understanding, all data are derived from official sources.

また事務局は、CCSBT メンバー及び共通する貿易パートナーとなっている非協力的非加盟国（NCNM）の一部に関する COMTRADE のデータソースについても確認し

² No subscription/payments are required to access UN COMTRADE data UN COMTRADE にアクセスするにあたり、購読契約／支払いは不要である。

た。COMTRADE に挙げられているデータソースの表を別紙 F に示した。事務局が理解する限りでは、全データが公的なソースから生成されている。

Based on these findings, the Secretariat concluded that the UN COMTRADE database would be a suitable alternative source of trade data to replace the GTA. Therefore, the Secretariat did not renew its annual GTA subscription in January 2019³.

これらの調査結果から、事務局は、GTA に替わる貿易データソースとしては UN COMTRADE データベースが適当であるとの結論に至った。このため事務局は、2019 年 1 月が契約満了の期限であった GTA の年間購読契約を更新しなかった³。

4.4 Summary of Trade Data from UN COMTRADE

UN COMTRADE から得た貿易データの概要

The Secretariat has examined its CDS data as well as trade data from the UN COMTRADE database. In the CDS database and also in the EU's annual reports to the Compliance Committee and Extended Commission, only small imports of less than 0.1 tonnes are recorded as occurring between 2016 and 2018.

事務局は、CDS データ並びに UN COMTRADE データベースから得た貿易データを精査した。CDS データでも遵守委員会及び拡大委員会に対する EU の年次報告書でも、2016 年から 2018 年の間に行われたとして記録されている（EU の）輸入量は非常に小さく、0.1 トン未満である。

A summary of COMTRADE database information for SBT for the period 2016 to 2018 is provided at **Attachment G**. This summary does not include reported trade of live SBT as it has in previous years because the Secretariat has assumed that any recorded trade in live SBT is due to miscoding.

2016 年から 2018 年の期間における COMTRADE データベースの情報の概要は別紙 G のとおりである。事務局は「SBT 活魚の貿易」として記録されているものはミスコードであると想定しているため、本概要では以前に SBT 活魚の貿易として報告されていたものは含めていない。

COMTRADE: Exports and Re-exports

COMTRADE : 輸出及び再輸出

Refer to Attachment G: Tables 1a-c

別紙 G の表 1a-c を参照されたい。

- Australia's total SBT exports for 2018 are recorded as 14,138.9t (for fresh/chilled and frozen SBT combined) in COMTRADE, which is quite a lot higher than reported in the CDS (9,371.8t) for 2018 – refer to paper CCSBT-CC/1910/04: Attachment C, Tables (C)i and ii).

COMTRADE においては、オーストラリアの 2018 年における総 SBT 輸出量は 14,138.9 トン（生鮮／冷蔵及び冷凍 SBT の合計）と記録されており、2018 年の CDS で報告された数量（9,371.8 トン）よりも非常に多くなっている。文書 CCSBT-CC/1910/04 別紙 C の表(C)i 及び ii) を参照されたい。

- Indonesia's SBT exports are well under-represented in all 3 years of the COMTRADE export statistics – COMTRADE records only 11t, 16t and 0.3t of total exports (fresh and frozen SBT combined) for 2016, 2017, and 2018 respectively. COMTRADE の輸出統計では、3 年間のいずれの年でもインドネシアの SBT 輸出量がかなり低く示されている。2016 年、2017 年、2018 年の総輸出量

³ This resulted in a saving of USD \$3,753.62 これにより 3,753.62 米ドルの節約となった。

(生鮮及び冷凍 SBT の合計) はそれぞれわずか 11 トン、16 トン及び 0.3 トンとして記録されている。

- South Africa's exports are also well under-represented on the COMTRADE database – COMTRADE records only 2.5t, 31.8t and 42.6t of total exports (fresh and frozen SBT combined) for 2016, 2017, and 2018 respectively.

また、COMTRADE データベースでは南アフリカの輸出量もかなり低く示されており、2016 年、2017 年及び 2018 年の総輸出量 (生鮮及び冷凍 SBT の合計) はそれぞれわずか 2.5 トン、31.8 トン及び 46.2 トンとして記録されている。

- The USA is recorded as having large exports of fresh/chilled SBT - 127.5t, 97.9t and 141.6t for 2016, 2017 and 2018 respectively. Due to the product being recorded as fresh SBT, this seems likely to be due to miscoding.

米国の生鮮／冷蔵 SBT の輸出量が非常に大きくなっており、2016 年、2017 年及び 2018 年においてそれぞれ 127.5 トン、97.9 トン及び 141.6 トンとして記録されている。製品が生鮮 SBT として記録されていることから、これはミスコードによるものである可能性が高い。

- For 2016 to 2018, the COMTRADE statistics record that small quantities of SBT were traded by EU Members, with a large export figure (376.5t⁴) recorded for 2016. These figures seem to indicate that species miscoding by EU Member States is continuing to occur.

2016 年から 2018 年に関して、COMTRADE 統計では EU メンバー国による SBT の貿易量は少ないが、2016 年には大きな輸出量 (376.5 トン⁴) が記録されている。これらの数字は、EU メンバー国による種のミスコードが引き続き発生していることを示唆しているものと考えられる。

- There are some medium to large SBT export figures unexpectedly recorded for Algeria, Iran, Oman and Sri Lanka (for Oman there is an import, export and re-export figure of 33t of fresh/chilled SBT recorded for 2017).

アルジェリア、イラン、オマーン及びスリランカに関して、想定外の中規模から大規模な SBT 輸出の数字が記録されている (オマーンに関しては、2017 年に輸入、輸出及び再輸出の数字として 33 トンの生鮮／冷蔵 SBT が記録されている)。

COMTRADE: Imports

COMTRADE : 輸入

Refer to Attachment G: Tables 2a and b

別紙 G の表 2a 及び 2b を参照されたい。

- For 2016 to 2018, COMTRADE statistics record that quantities of SBT were traded by EU Members, again appearing to indicate that species miscoding by EU Member States is continuing to occur.

2016 年から 2018 年に関して、COMTRADE 統計は EU メンバー国による相当量の SBT の貿易があったことを記録しているが、やはり EU メンバー国による種のミスコードが引き続き発生していることを示唆しているものと考えられる。

- COMTRADE records Mauritius as having imported 1.6t and 2.0t of frozen SBT from China in 2016 and 2017 respectively, and this same information is reflected on the Mauritius Chamber of Commerce and Industry website. The Secretariat contacted Mauritius to confirm if this imported product was correctly coded as SBT and

⁴ 375.1t of the 376.5t recorded for the Netherlands 376.5 トンのうち 375.1 トンはオランダに関する記録である。

Mauritius advised that this product was not SBT and had likely been miscoded.

COMTRADE は、モーリシャスが中国から 2016 年及び 2017 年にそれぞれ 1.6 トン及び 2.0 トンの冷凍 SBT を輸入したことを記録しており、モーリシャス商工会議所のウェブサイトでも同じ情報が反映されている。この輸入製品は正しく SBT としてコードされていたのかどうかを確認するために事務局からモーリシャスに連絡したところ、モーリシャスは当該製品は SBT ではなくミスコードであった可能性が高いとした。

- There are some medium to large SBT import figures unexpectedly recorded for Cote d'Ivoire, Ghana, Malaysia, Oman (the 33t of fresh SBT imported into Oman in 2017 matches the 33t export and re-export figures of 33t recorded for Oman in Tables 1a and 1b), Thailand and the United Arab Emirates.

コートジボアール、ガーナ、マレーシア、オマーン（2017 年にオマーンが輸入した 33 トンの生鮮 SBT との数字は、表 1a 及び 1b に示したとおり、オマーンに関して記録された 33 トンの輸出及び 33 トンの再輸出の数字と合致している）、タイ及びアラブ首長国連邦に関して、想定外の中規模から大規模な SBT 輸入の数字が記録されている。

5. Recommendations

勧告

It is recommended that CC14:

CC 14 に対して以下を勧告する。

- Notes the information presented in this paper.
本文書に提示した情報について留意すること。

1 September 2018

IOTC Ref: 7004

Mr Wan Chen
IOTC Head of Delegation
Division of Deep Sea Fishing
CHINA

wan.chen@live.com

REQUEST FOR URGENT ACTION REGARDING ALLEDGED ILLEGAL FISHING ACTIVITIES BY VESSELS REGISTERED TO THE PEOPLES REPUBLIC OF CHINA.

The Indian Ocean Tuna Commission is the intergovernmental organization responsible for the management of tuna and tuna-like species in the Indian Ocean. The Peoples Republic of China joined the Commission (acceded to the IOTC Agreement) in October 1998.

In 2006, IOTC adopted a management measure (Resolution 06/02) to establish a programme for transshipment by large-scale fishing vessels responding to the need to combat illegal, unregulated and unreported (IUU) fishing activities by focusing on transhipped tuna. This management measure, which came into effect in 2009, gave the Commission the mandate to deploy observers to monitor the transshipment activities by large-scale longline vessels in the IOTC Area of competence. This measure was last updated in 2017 as per Resolution 17/06.

In accordance with Resolution 17/06, the IOTC Secretariat implements a Regional Observer Programme (ROP). Furthermore, it does this in close collaboration with the Commission for the Conservation of Southern Bluefin Tuna (CCSBT)

I am writing to alert you to a report the IOTC Secretariat has received from the ROP regarding possible illegal activities by six Chinese-flagged vessels.

In early July, IOTC received information from CCSBT that a number of Chinese longliners were operating in an area where southern bluefin tuna is prevalent and there was a strong possibility that the vessels were targeting southern bluefin tuna or taking southern bluefin tuna as bycatch. This information was conveyed to the ROP Consortium with the specific request for the observer aboard the carrier vessel PING TAI RONG LENG No. 2 (PTR2), which was receiving transshipments from these fishing vessels, to be on the lookout for possible transshipments of southern bluefin tuna being reported as another tuna species.

In late July, the observer aboard the PTR2 informed the ROP that he was observing the transshipment of what appeared to be southern bluefin tuna incorrectly labelled as yellowfin tuna.

The fishing vessels involved were: Ping Tai Rong 316, Ping Tai Rong 70, Ping Tai Rong 318, Ping Tai Rong 71, Ping Tai Rong 65 and Ping Tai Rong 68. Furthermore, the observer provided the following information of the minimum numbers of fish he believed to be southern bluefin tuna (not yellowfin tuna) during last five transshipments

If the observer is correct, and yellowfin tuna is being misrepresented in the official transshipment declaration forms, this amounts to serious mis-reporting under IOTC Resolution 17/06. Notwithstanding the misreporting of yellowfin (a species which is considered to be overfished in the IOTC Area), the potential impact on southern bluefin tuna, which is also in a highly depleted state, is of major concern to CCSBT.

Fishing vessel	SBT
Ping Tai Rong 70	35
Ping Tai Rong 68	32
Ping Tai Rong 318	57
Ping Tai Rong 316	25
Ping Tai Rong 303	31

Paragraph 25 of IOTC Resolution 17/06 states the following:

*The IOTC Secretariat shall, when providing CPCs with copies of all raw data, summaries and reports in accordance with paragraph 10 of **Annex III** to this Resolution, also indicate evidence indicating possible infraction of IOTC regulations by LSTLVs/carrier vessels flagged to that CPC. Upon receiving such evidence, each CPC shall investigate the cases and report the results of the investigation back to the IOTC Secretariat three months prior to the IOTC Compliance Committee meeting. The IOTC Secretariat shall circulate among CPCs the list of names and flags of the LSTLVs/Carrier vessels that were involved in such possible infractions as well as the response of the flag CPCs 80 days prior to the IOTC Compliance Committee meeting.*

In accordance with paragraph 25, China is required to investigate the aforementioned case and report back to the IOTC Secretariat.

Your urgent attention to this matter is vital. The carrier vessel PING TAI RONG LENG No. 2 is expected to arrive in the port of Zhongshan, China on or before 5 September 2018, and offload its tuna.

I would be grateful if you can acknowledge this request for action, and given the seriousness of the matter, I seek your permission to release the ROP Deployment Report to the Executive Secretary of CCSBT.

Finally, the IOTC Secretariat stands by to provide any further assistance or information you might need in your investigation; and I look forward to receiving the results of your investigation in the near future.

Yours sincerely



Christopher O'Brien
Executive Secretary

Cc:

Ms Zhao Liling (bofdwf@gmail.com)
Ms Ji Zhiyuan (ji_zhiyuan@mfa.gov.cn)
Mr Zhao Gang (admin1@tuna.org.cn)
Executive Secretary CCSBT (rkennedy@ccsbt.org)

Commission for the Conservation of
Southern Bluefin Tuna



みなみまぐろ保存委員会

Mr Wan Chen
IOTC Head of Delegation
Division of Deep Sea Fishing
CHINA
wan.chen@live.com

4 September 2018

Dear Mr. Wan Chen,

**FOLLOW-UP TO THE IOTC'S LETTER REGARDING ALLEGED ILLEGAL FISHING
ACTIVITIES BY VESSELS REGISTERED TO THE PEOPLE'S REPUBLIC OF CHINA**

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.

The CCSBT has received a copy of a letter dated 1 September 2018 to yourself from Christopher O'Brien, Executive Secretary of the Indian Ocean Tuna Commission (IOTC) concerning alleged illegal fishing activities by six fishing vessels registered to the People's Republic of China. I wish to follow-up with you urgently regarding this matter.

As noted in the IOTC's letter, in early July the CCSBT Secretariat shared information with the IOTC Secretariat that a number of Chinese longliners were operating in the same area that CCSBT- authorised fishing vessels were known to be catching SBT, and that there was therefore a strong likelihood that those Chinese longliners were also catching SBT.

The IOTC Secretariat then conveyed this information to its transshipment Regional Observer Program (ROP) Consortium with a specific request that the observer aboard the Chinese-flagged carrier vessel PING TAI RONG LENG No. 2, which was receiving transshipments from these fishing vessels, check for any possible transshipments that included SBT.

In its letter, the IOTC also advised you that the observer aboard the Carrier Vessel PING TAI RONG LENG No. 2 subsequently noted that he was observing the transshipment of what appeared to be SBT incorrectly labelled as yellowfin tuna, and that the six Chinese fishing vessels involved in these transshipments were: Ping Tai Rong 65 and Ping Tai Rong 68, Ping Tai Rong 70, Ping Tai Rong 71, Ping Tai Rong 316 and Ping Tai Rong 318.

These vessels are not listed on CCSBT Record of Authorised Vessels. If these observations are correct, and that southern bluefin tuna were caught, retained and transhipped by these vessels, then this will be considered by the CCSBT to be illegal fishing and transshipment of SBT as the vessels involved have not been authorised to catch, carry or tranship SBT.

I request that China investigate this matter urgently. Prompt action is important because the carrier vessel PING TAI RONG LENG No. 2 is expected to arrive in the port of Zhongshan, China on or before 5 September 2018.

Furthermore, I request that the offloaded tuna be inspected and identified. If there is any uncertainty in the identity of tuna suspected of being SBT, I suggest that tissue samples be obtained and frozen for DNA analysis. The CCSBT Secretariat stands ready to provide assistance with respect to collecting tissue samples and conducting DNA species identification of the samples.

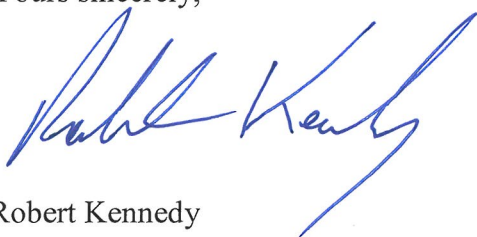
I would also like to take this opportunity to refer to a letter from the Chair of CCSBT's Extended Commission dated 7 December 2017 (attached) relating to IUU fishing involving SBT by other Chinese vessels that China took action against. This letter sought cooperation from China to ensure ongoing requisite control of its vessels, such as by continuing to prohibit Chinese vessels from participating in fishing activities involving SBT until China has established a cooperative arrangement with the CCSBT.

In addition, I would again like to extend an invitation to China to attend the CCSBT's upcoming annual meetings in October 2018 and to consider becoming a Member or CNM of the CCSBT.

I would be grateful if you could acknowledge receipt of this letter. I would also like to request that China copy me into any further correspondence in relation to this matter, including the results of any sampling and/or investigations that are undertaken.

I look forward to hearing from you in the near future,

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Robert Kennedy', with a long, sweeping underline.

Robert Kennedy
Executive Secretary

Cc:

Ms Zhao Liling (bofdwf@gmail.com)

Ms Ji Zhiyuan (ji_zhiyuan@mfa.gov.cn)

Mr Zhao Gang (admin1@tuna.org.cn)

Executive Secretary IOTC (IOTC-Secretariat@fao.org)

LSTLVs – Several (Deploy 497)**Received 11/03/2019 from LIU Liming****Possible**

• Possible transshipment of SBT

infraction:**Participating Fleet****CHINA**

Dr. Christopher O'Brien
Executive Secretary
Indian Ocean Tuna Commission
SEYCHELLES

March 8, 2019

Subject: Outcome of the Investigation on Suspected Illegal Operation of Ping Tai Rong Company

Dear Dr. Christopher O'Brien,

Reference is made to your letter of Sept 1, 2018 (IOTC Ref: 7004) and IOTC Observer Report (497-18) on the suspected illegal operation of tuna longliners, namely Ping Tai Rong 65/68/70/71/303/316/318, and carrier vessel, Ping Tai Rong Leng 2, whose owner is Ping Tai Rong Deep Sea Fishing Group Co., LTD.

After receiving the letter and the Report, the Bureau of Fisheries (BOF) of Ministry of Agriculture and Rural Affairs of China immediately notified Zhejiang Provincial Bureau of Ocean and Fisheries (hereafter referred to as "the Zhejiang Bureau") to investigate on the case. The Zhejiang Bureau, after receiving the notification, attached great attention to this matter and took immediate action.

According to the requirement of the notification by BOF, the Zhejiang Bureau established an investigation team, which consists of the responsible office of the Bureau, the provincial law-enforcement unit, the Zhoushan Bureau of Ocean and Fisheries, Research Center of International Laws and Affaire for Distant water Fisheries of Shanghai Ocean University (hereafter referred to as "the Research Center") and the Marine Fisheries Research Institute of Zhejiang Province, to investigate on the suspected illegal catch of southern bluefin tuna of the seven longliners, the transshipment of the suspected bluefin tuna catch from the longliners to the Carrier Vessel Ping Tai Rong Leng 2, as well as other suspected illegal matters made by the above mentioned seven longliners.

I wish to advise that the investigation report indicated that no bluefin tuna was found during the investigation. The following refers to the investigation method and process.

1. Investigation Process

After receiving the notification from the BOF on September 3, the Zhejiang Bureau immediately instructed the Carrier Vessel Ping Tai Rong Leng 2, which is on the way heading for China, not to call any port, not to make transshipment with any other vessel before docking pier at the wharf of Zhoushan National Distant Water Fisheries Base (NDWF Base). At the same time, the Zhejiang Bureau invited the Research Center of Shanghai Ocean University to appoint experts to Zhoushan to assist the Bureau to conduct catch port inspection and fish species identification on the catch on board the carrier vessel Ping Tai Rong Leng 2, who docked pier at the wharf of NDWF Base on the afternoon of September 5.

On the morning of September 6, the investigation team entered to the site. In the afternoon, the relevant leaders of Zhejiang Bureau convened a special meeting on “port inspection and fish species identification for catch transshipped to Ping Tai Rong Leng 2” to discuss the implementation of this inspection. At the meeting, the catch inspection team introduced the preliminary plan of catch inspection and further improved the work plan after hearing the opinions of the meeting participants. At the same time, researchers from Zhejiang Marine Fisheries Research Institute are invited to join the catch inspection work during the whole inspection process. The meeting tasked team member from Zhejiang Bureau to check the logbook, navigation equipment and layout of the catch holding, and those from the Research Center to examine the catch and species identification, and the Zhejiang Marine Fisheries Research Institute to arrange researchers for participation the whole the investigation.

At 3:30 p.m. of September 6, the investigation team boarded the Carrier Vessel Ping Tai Rong Leng 2 and questioned the master, chief mate and crew, checked the log book, electronic navigation record, and observer’s transshipment report and customs declaration list. The team also checked and verifies the integrity of the fish in the hold.

Carrier Vessel Ping Tai Rong Leng 2 started to unload the fish (the first string bag) at 4:48 PM on September 6 and finished the unloading of all the catch at 10:00 PM on September 13. A total of 1602.8 tons of catch has been discharged during the 8 days, which is consistent with the customs data.

The entire unloading process was carried out under the supervision of the investigation team. The team member from Shanghai Ocean University took photos and randomly collected samples for each string bag of fish in the unloading process.

2. Catch Inspection and Species Identification Scheme

- 1) During the unloading, the catch inspection team should participate in the whole process, including fish sampling and unloading supervision, photo-taking of each string fish, recorded the whole process of fish unloading and the discharge order of catch transshipped from related fishing vessel in detail.

- 2) The catch was examined by random sampling from 5% to 10% and preliminary identification of specie was made. The length data (head length or trunk length) of the sample individuals were measured and muscle tissue samples were taken from some individuals.
- 3) After completing the unloading of the catch, the catch inspection team should check whether all the catch has been unloaded completely.
- 4) DNA testing of muscle tissue was performed on individuals sampled at the site if the species could not be preliminarily identified. The process includes tissue processing in the relevant laboratory in Research Center, extraction of genomic DNA and PCR amplification of conventional gene COI. The Research Center conducted analysis of the sequencing results to determine the species of the samples.

3. Outcome of the Investigation

- 1) **Inspection of log book and electronic navigation records of Ping Tai Rong Leng 2.**

The log book of Ping Tai Rong Leng 2 shows that the Vessel left Singapore for Zhoushan on August 29 and arrived at the wharf of Zhoushan NDWF Base on the afternoon of September 5. During the voyage, the carrier vessel did not call at any other port or alongside to other ships.

- 2) **Inspection of the catch layout integrity inside the hold of Ping Tai Rong Leng 2.**

According to the cargo space arrangement plan provided by The Ping Tai Rong Leng 2, the vessel has 4 freezing holds. The loading arrangement of the catch is as follows:

Hold No.4: 662.53 tons of ultra low temperature catch (bigeye tuna, yellowfin tuna, oil fish and a small quantity of swordfish);

Hold No.3: 511.7 tons of albacore tuna;

Hold No.2: 137.26 tons of albacore tuna;

Hold No.1: 269.43 tons of mixed fish (moonfish, butterfly mackerel (*Gasterochisma melampus*), dolphin-fish (*Coryphaenidae*), wahoo (*Acanthocybium solandri*), black marlin (*Makaira indica*).

By comparison with the customs declaration list and the catch space arrangement, all the catch inside the holds have been neatly arranged and well classified, so that the possibility of transshipment and/or discarding on the way back can be

ruled out.

- 3) A total of 604 samples of length data were randomly sampled. For the fish without head and tail, which could not be identified in morphology, important samplings were conducted and muscle samples collected (253 in total). Only a small number of samples were taken for mixed fish and albacore tuna with the morphological characteristics. The entire unloading process is conducted in orderly and normal way.

4) Results of DNA testing

For the 253 muscle samples collected, most of them could identify the species after morphological identification through photo comparison. However, there were still 46 samples without head and tail that could not be identified and therefore needed DNA testing. Genomic DNA was extracted from each sample and checked by electrophoresis. Conventional COI DNA Barcoding Cocktail PCR and sequencing analysis were carried out for all 46 samples. The sequencing results were blasted on NCBI. The 46 samples were identified by DNA testing basically covered all the samples without head and tail. And the testing indicates that no southern bluefin tuna (*Thunnus maccoyii*) was found (38 of which were determined yellowfin tuna *Thunnus albacares* and 8 of them bigeye tuna *Thunnus obesus*).

4. Conclusion and comments

According to the information available at the present, there is no evidence indicating that Ping Tai Rong Leng 2 has conducted illegal transshipment at sea of the southern bluefin tuna.

5. Other matters

- 1) All the seven LL vessels suspected to have transhipped bluefin tuna to Carrier Vessel Ping Tai Rong Leng 2, according to the Observer Report (497-18), were called back for further investigation by the BOF soon after the receipt of the letter of September 1, 2018 from the Executive Secretary. The vessels arrived at the wharf of Zhoushan NDWF Base on October 7 and October 8 respectively. Internal investigation on the vessels against bluefin tuna indicated no evidence on the alleged violation.

In addition, on her way back to China, FV Ping Tai Rong 316 was inspected by an Indonesian patrol boat (BC 3005) near in area near to Singapore at 8:00 on the morning of September 23, 2018, and no violation was found during the inspection.

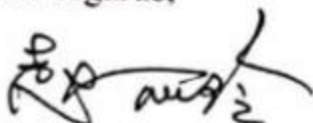
- 2) The outcome of investigation on other matters indicated in the Observer Report (497-18), such as vessel marking, VMS and logbook, have been submitted separately to Secretariat on March 5, 2019.

I wish to take this opportunity to assure to the Commission that China bears no tolerance on violation of domestic and international laws and regulations on deepsea fishing, and serious punishment would be imposed on vessel owners if their vessel(s) have been indentified to have engaged in illegal fishing.

Hope the information above could clarify the situation.

Should you have any questions, please do not hesitate to let me know.

Kind regards,



ZHAO Liling
Director
Division of Deepsea Fishing
Bureau of Fisheries
Ministry of Agriculture and Rural Affairs
People's Republic of China

Attachment:

1. DNA Test Report
2. Navigation Chart of FV Ping Tai Rong 65/68/70/71/303/316/318 and CV Ping Tai Rong Leng 2
3. Customs Clearance Declaration



PTR65 20170920-20181007



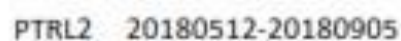
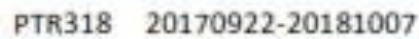
PTR68 20170920-20181007



PTR70 20180321-20181007



PTR71 20180321-20181007





PTR303 20170929-20181007



PTR316 20170922-20181007

Zhejiang Academy of Science and Technology for Inspection and Quarantine

**TEST REPORT****Report No:** D18018379**Report Date:** 2018/12/17**Client Name:** Research Center of International Laws and Affairs for Distant-water Fisherises**Contact person:** Liu Yang**Date of Receipt:** 2018/12/10**Sample Size:** 46**Sample Description:** freezing**Test Result(s)**

SampNo	SampName	ItemName	Result	TestLimit	Unit	MethodNo
Y18029984	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18029988	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18029989	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18029990	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18029991	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18029992	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18029993	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18029994	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18029995	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18029996	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019

Address: No.126 Fuchun Road, Hangzhou, Zhejiang (Zip code: 310016)
 HomePage: www.zaiq.org.cn

Tel/Fax: +86-0571-81100631/81100583

(Report Page 4-1)

Y18029997	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18029998	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18029999	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030000	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030001	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030002	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030003	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030004	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030005	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030006	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030007	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030008	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030009	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030010	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030011	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030012	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030013	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019

Address: No.126 Fuchun Road, Hangzhou, Zhejiang (Zip code: 310016)
 HomePage: www.zaiq.org.cn

Tel/Fax: +86-0571-81100631/81100583

(Report Page 4-2)

Y18030014	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030015	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030016	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030017	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030018	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030019	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030020	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030021	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030022	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030023	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030024	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030025	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030026	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030027	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030028	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030029	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030030	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019

Address: No.126 Fuchun Road, Hangzhou, Zhejiang (Zip code: 310016)
 HomePage: www.zaiq.org.cn

Tel/Fax: +86-0571-81100631/81100583

(Report Page 4-3)

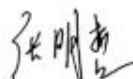
Y18030031	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019
Y18030032	Southern bluefin tuna(<i>Thunnus maccoyii</i>)	<i>Thunnus maccoyii</i>	No <i>Thunnus maccoyii</i> DNA detected	/	/	S-NS019

End of the list

Note:

- * The results shown in this test report refer only to the sample(s) tested, and cannot be used for any improper publicity.
- * This test report cannot be reproduced except in full, without written approval of the laboratory.
- * Not Detected means not detected at or above the limit of quantification.

Authorized Signature:




中华人民共和国海关进口货物报关单 *290420181048006920*

预录入编号: 11010000000481757 海关编号: 290420181048006920 (舟山海关) 页码/页数: 1/2

境内收货人 (91330000702000071) 平太荣远洋渔业集团有限公司	进境关别 (2304) 舟山海关	出口日期 20180905	申报日期 20180905	备案号 230418006920
境外发货人 (30) /	运输方式 (2) 水路运输	运输工具名称及航次号 P1827110062/0802	提单号 P18122014821	贸易方式 来料加工
消费使用单位 (91330000702000071) 平太荣远洋渔业集团有限公司	监管方式 (9900) 保税	贸易国别 (811) 菲律宾	许可证号	用途 跨境电商
合同协议号	贸易国 (地区) (315) 中国	启运地 (地区) (315) 毛里求斯	启运地 (地区) (315) 毛里求斯	入境口岸 (330001) 舟山定海港区
货物名称 (30/50) 鳕鱼/鳕鱼	件数 1	毛重(千克) 1320072	净重(千克) 1320072	成交方式 (1) CIF

随附单证: 1. 符合原产地产品证明书(20180001766); 2. 符合原产地产品证明书(20180001770); 3. 随附单证: 贸易、合同、代理报关委托书 (纸质)

申报日期: 20180905
备注: 生产地: 平太荣65/66/70/71/300/316/346; 报关于印度洋公海; N/A

序号	商品编号	商品名称及规格型号	数量及单位	单价/总价/币种	原产国(地区)	最终目的国(地区)	境内目的地	征免
1	0303440000	冻无鳞金枪鱼 0.3.冻;Thunnus albacora;10KG-50KG/条	24000 千克	45.0000 1080000.0000	中国 (33000)	中国 (33000/330001) 舟山/舟山市普陀区	全免 (3)	
2	0303570000	冻圆鳕 0.3.冻;Gadus aoteanus;40KG-100KG/条	28000 千克	17.0000 476000.0000	中国 (33000)	中国 (33000/330001) 舟山/舟山市普陀区	全免 (3)	
3	0303410000	冻无鳞金枪鱼 0.3.冻;Thunnus albacora;10KG-50KG/条	17733 千克	15.0000 266000.0000	中国 (33000)	中国 (33000/330001) 舟山/舟山市普陀区	全免 (3)	
4	0303420000	冻无鳞金枪鱼 0.3.冻;Thunnus albacora;10KG-50KG/条	98529 千克	35.0000 3443515.0000	中国 (33000)	中国 (33000/330001) 舟山/舟山市普陀区	全免 (3)	
5	0303590000	冻鳕鱼 0.3.冻;Tetrapturus albidus;20KG-50KG/条	1034 千克	13.0000 13442.0000	中国 (33000)	中国 (33000/330001) 舟山/舟山市普陀区	全免 (3)	
6	0303500000	冻鳕鱼 0.3.冻;Makaira mazara;20KG-100KG/条	1034 千克	13.0000 13442.0000	中国 (33000)	中国 (33000/330001) 舟山/舟山市普陀区	全免 (3)	
7	0303500000	冻鳕鱼 0.3.冻;Makaira mazara;20KG-100KG/条	28019 千克	13.0000 364247.0000	中国 (33000)	中国 (33000/330001) 舟山/舟山市普陀区	全免 (3)	
特殊关系确认: 否 价格影响确认: 否 支付特许权使用费确认: 否 自报自缴: 否								
报关人员 报关人员证号: 29105181		电话		兹申明对以上内容承担如实申报、依法纳税之法律责任		海关验放章		
申报单位: (91330000400905440) 中国舟山外轮代理有限公司								

平太荣报关单-1

中华人民共和国海关进口货物报关单 *290420181048006920*

预录入编号: 12010000000481757 海关编号: 290420181048006920 (舟山海关) 页码/页数: 2/2

境内收货人 (91330000702000071) 平太荣远洋渔业集团有限公司	进境关别 (2304) 舟山海关	出口日期 20180905	申报日期 20180905	备案号 230418006920
境外发货人 (30) /	运输方式 (2) 水路运输	运输工具名称及航次号 P1827110062/0802	提单号 P18122014821	贸易方式 来料加工
消费使用单位 (91330000702000071) 平太荣远洋渔业集团有限公司	监管方式 (9900) 保税	贸易国别 (811) 菲律宾	许可证号	用途 跨境电商
合同协议号	贸易国 (地区) (315) 中国	启运地 (地区) (315) 毛里求斯	启运地 (地区) (315) 毛里求斯	入境口岸 (330001) 舟山定海港区
货物名称 (30/50) 鳕鱼/鳕鱼	件数 1	毛重(千克) 1320072	净重(千克) 1320072	成交方式 (1) CIF

随附单证: 1. 符合原产地产品证明书(20180001766); 2. 符合原产地产品证明书(20180001770); 3. 随附单证: 贸易、合同、代理报关委托书 (纸质)

申报日期: 20180905
备注: 生产地: 平太荣65/66/70/71/300/316/346; 报关于印度洋公海; N/A

序号	商品编号	商品名称及规格型号	数量及单位	单价/总价/币种	原产国(地区)	最终目的国(地区)	境内目的地	征免
7	0303590000	冻鳕鱼 0.3.冻;Ruvettus pretiosus;10KG-50KG/条	133732 千克	15.0000 2005980.0000	中国 (33000)	中国 (33000/330001) 舟山/舟山市普陀区	全免 (3)	
8	0303590000	冻鳕鱼 0.3.冻;Acetorhynchus solandri;50KG-100KG/条	17241 千克	15.0000 258615.0000	中国 (33000)	中国 (33000/330001) 舟山/舟山市普陀区	全免 (3)	
9	0303510000	冻鳕鱼 0.3.冻;Prionace glauca;10KG-50KG/条	17243 千克	15.0000 258615.0000	中国 (33000)	中国 (33000/330001) 舟山/舟山市普陀区	全免 (3)	
10	0303590000	冻鳕鱼 0.3.冻;Lampris guttatus;10KG-50KG/条	4103 千克	15.0000 61545.0000	中国 (33000)	中国 (33000/330001) 舟山/舟山市普陀区	全免 (3)	
11	0303590000	冻鳕鱼 0.3.冻;Lampris guttatus;10KG-50KG/条	77154 千克	4.0000 308616.0000	中国 (33000)	中国 (33000/330001) 舟山/舟山市普陀区	全免 (3)	
12	0303590000	冻鳕鱼 0.3.冻;Lampris guttatus;10KG-50KG/条	77154 千克	4.0000 308616.0000	中国 (33000)	中国 (33000/330001) 舟山/舟山市普陀区	全免 (3)	

特殊关系确认: 否 价格影响确认: 否 支付特许权使用费确认: 否 自报自缴: 否

报关人员
报关人员证号: 29105181

电话

兹申明对以上内容承担如实申报、依法纳税之法律责任

海关验放章

申报单位: (91330000400905440) 中国舟山外轮代理有限公司

平太荣报关单-2

Extract from Circular #2019/006: Letter from the EU dated 24 January 2019

“3. SBT trade in the EU reported in the Global Trade Atlas

Recurrently the EU, among others, is asked to investigate alleged SBT trade reported in the Global Trade Atlas and advise the secretariat on specific trade exchanges. The EU has many times investigated those exchanges for which the conclusions invariably have indicated that it is a case of miscoding of SBT, notably by mistaking SBT with Atlantic bluefin tuna, which is one of the main fishing products in the EU market.

Global Trade Atlas provides trade information that sometimes uses non-official sources. In addition to that, as the 28 EU Member States operate as a single market without internal customs or trade barriers, it can be difficult to interpret some data for individual Member States.

In fact, the official European statistics on international trade in goods come from COMEXT, Eurostat’s reference database for trade in goods. While trade in goods statistics with non-EU countries are mainly collected from customs authorities and based on customs declarations, the information on intra-EU trade is collected on the basis of the declarations by individual trade operators and, therefore, more prone to miscoding.

To conclude, while compiling the compliance report, 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.”



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

22 May 2019

Dear Mr. Lahoud,

RE: Cooperation Between Lebanon and the CCSBT

I present my compliments to you on behalf of the Commission for the Conservation of Southern Bluefin Tuna (CCSBT). The CCSBT is the intergovernmental organisation responsible for the management of Southern Bluefin Tuna (SBT) throughout its distribution.

One of the CCSBT's main conservation and management measures is its Catch Documentation Scheme (CDS). The CCSBT considers that exports, re-exports or imports of SBT are illegal unless they are accompanied by appropriate CCSBT CDS documents¹.

From trade statistics and information provided to us by Indonesia (one of CCSBT's Members), it appears that Indonesia exported SBT to Lebanon at least between the years 2011 to 2017 inclusive.

Lebanon is not a Member of the CCSBT and so it is not bound by CCSBT's Resolutions. However, we would like to explore opportunities for Lebanon to voluntarily cooperate with the CCSBT.

We would like to request that Lebanon consider:

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

Please let me know if you have any queries concerning the information provided in this letter. I hope that Lebanon will be able to consider our requests favourably.

Yours sincerely,

Robert Kennedy
Executive Secretary

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

COMTRADE's Listed Data Sources

Member	COMTRADE Data Source
Australia	Australian Bureau of Statistics
European Union	COMEXT ¹
Indonesia	Statistics Indonesia/ Statistical Services and Promotion
Japan	Ministry of Finance, Japan
Korea	South Korea Customs Service
New Zealand	Statistics New Zealand
South Africa	South African Revenue Service
Taiwan	International Trade Commission/ FTP ²

Common Trading Partners	COMTRADE Data Source
China	General Administration of Customs of China
Hong Kong	Permanent Mission of the People's Republic of China
Singapore	(International) Enterprise Singapore
USA	US Census Bureau

¹ COMEXT is Eurostat's reference database for detailed statistics on international trade in goods. It provides access to both recent and historical data of the EU and its individual Member States as well as to statistics of a significant number of non-EU countries.

² The Secretariat is uncertain what the abbreviation FTP represents

EXPORT/ IMPORT STATISTICS: 2016 – 2018 (COMTRADE)

Note:

Non-Cooperating Non-Members (NCNMs) appear at the bottom of all tables and are shaded in light grey. All trade figures except for Taiwan's have been sourced from UN COMTRADE.

EXPORTS and RE-EXPORTS

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

Exporter	2016	2017	2018
Australia	1,317.6	1,049.0	5,472.8
EU	376.5 ¹	2.0	19.2
Indonesia			0.3
Japan	0.1	0.1	
Korea	61.3	58.8	8.2
New Zealand	761.7	765.5	827.4
South Africa	1.9	31.8	42.6
Algeria	133.7	484.6	
Iran	4.3	22.1	
Oman	20.0	33.0	
USA	127.5	97.9	141.6

Table 1b – Re-exports: Fresh/Chilled SBT (Commodity Code 030236)

Re-exporter	2016	2017	2018
Oman		33.0	
USA		34.5	36.4

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

Exporter (030346)	2016	2017	2018
Australia	7,032.1	7,567.8	8,666.1
EU	0.1	5.3	0.0
Indonesia	11.0	16.0	
Japan	169.1	172.3	248.0
Korea	998.7	628.8	1,313.1
South Africa	0.6		
Taiwan	647.5	880.9	812.1 ²
Oman	24.3		
Sri Lanka		14.8	
USA	15.7	2.7	
Viet Nam	1.1	8.4	

¹ 375.1t of this 376.5t was recorded as an export from the Netherlands

² This figure was not yet available from COMTRADE and was instead sourced directly from Taiwan's Bureau of Foreign Trade website from which trade data is publicly accessible:
<https://cus93.trade.gov.tw/FSCE020F/FSCE020F> (COMTRADE figures for 2016 and 2017 match the figures provided on this website)

IMPORTS

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

Importer	2016	2017	2018
Australia	5.5	0.8	5.0
EU	572.0 ³	22.8	11.3
Japan	2,087.9	1,892.8	1,854.4
Korea	0.1	7.8	5.3
New Zealand	0.1	0.1	0.1
South Africa	5.1	8.8	
Taiwan		0.1	
Bahrain	2.4		
Canada	37.9	49.6	78.6
China	0.3	20.4	
Ghana	108.2		
Hong Kong	5.3	4.7	2.0
Malaysia	2.7	0.1	21.4
Oman		33.0	
Singapore	4.2		2.4
United Arab Emirates	0.5	3.0	0.7
USA	80.6	19.2	60.4

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

Importer	2016	2017	2018
Australia	0.1	0.1	
EU	11.7	17.5	44.9
Japan	9,518.5	8,391.6	9,561.1
Korea	386.9	799.6	671.7
New Zealand	0.02		
Brunei Darussalam		0.3	9.3
Cabo Verde		2.4	
Canada	6.9	0.0	7.2
China	0.2	218.9	
Cote d'Ivoire	27.0	412.5	
Ghana		91.2	
Kazakhstan		2.5	
Malaysia		54.4	27.3
Mauritius	1.6 ⁴	2.0 ⁴	
Qatar	0.3		77.5
Thailand	27.7		
United Arab Emirates	0.2	21.4	51.2
USA	5.1	9.7	31.4

³ 565.6t of this 572t was recorded as an import into the Netherlands

⁴ Mauritius confirmed that this import was not SBT