



Australian Government

Department of Agriculture, Fisheries and Forestry

AUSTRALIA'S 2010 REVIEW OF THE RESOLUTION ON THE IMPLEMENTATION OF A CCSBT CATCH DOCUMENTATION SCHEME (CDS)

INTRODUCTION

This paper describes issued identified by Australia in the effective implementation of the *Resolution on the Implementation of a Commission for the Conservation of Southern Bluefin Tuna (CCSBT) Catch Documentation Scheme (CDS)*, and proposes means for improving and strengthening the resolution and its supporting procedures.

VESSEL REGISTRATION NUMBER

While most of the CCSBT CDS forms require a vessel registration number, they do not specify whether the CCSBT vessel registration, vessel's distinguishing symbol or national vessel registration number is required. Most Australian operators have used the vessel's distinguishing symbol for practical reasons; namely, a vessel's distinguishing symbol is well known to its operators and is used on a number of other mandatory forms in the fishery, such as daily logbooks and catch disposal records.

Australia recommends that vessels' distinguishing symbols should be entered as the vessel registration number of the CCSBT CDS forms. This is the easiest option for operators and will lead to the fewest number of errors when completing this section of the forms. To avoid potential duplication of distinguishing symbols among members and cooperating non-members (CNMs), the country prefix (e.g. 'AU') can be pre-printed on the necessary CDS forms.

DOCUMENTING ADDITIONAL PROCESSING ON CARRIER VESSELS

As noted by the Secretariat (CCSBT-CC/1010/05), the CDS does not currently take account of additional processing that may take place on board carrier vessels; principally the removal of fins, tail and gill plates of farmed fish. Where additional processing has occurred, the weight and length of individual fish at the final product destination will be less than specified on the Catch Monitoring Form and the Catch Tagging Form.

It is also apparent that some farmed SBT are loaded onto carrier vessels as 'fresh' and then subsequently frozen, so that product type (fresh/frozen) in the Intermediate or Final Product Destination sections will not match that listed in the Catch/Harvest Section of the Catch Monitoring Form.

Members should discuss how the CDS could be amended to track this additional processing and change in product type so that product can be adequately acquitted at the Final Product Destination. An agreed procedure for documenting all additional processing for individual fish should be agreed to ensure that Members are not held to account for undocumented additional processing conducted by another member on board carrier vessels.

PROPORTION OF FILLETED PRODUCT ENTERING THE GLOBAL SBT MARKET

Currently, there is no mandatory tagging of filleted (or loined) fish under the CCSBT CDS, which leaves open a possible loophole for the trade of illegally harvested SBT. Australia recommends that the amount of filleted fish as a proportion of total traded SBT product is monitored and compared with the average proportion before the CDS was implemented so that any significant increase in the proportion of filleted product entering the global SBT market can be detected. The Secretariat may be able to report to the CCSBT Compliance Committee the relative quantities of SBT imported into Japan per commodity code per calendar year, under the assumption that Japanese imports are a proxy for proportions entering the global SBT market. The Trade Statistics of Japan database (www.customs.go.jp/toukei/info/index_e.htm)¹ reports trade statistics for SBT under eight commodity codes and contains import data on SBT from 2002 onwards.

Commodity code	SBT product
0301.95.100	Live fry for fish culture
0301.95.900	Live other
302.36.000	fresh, chilled excluding fillets
0303.46.000	frozen, excluding fillets
0304.19.192	fresh fillets
0304.19.992	fresh other products
0304.29.940	frozen fillets
304.99.994	frozen other products

¹ Other publicly available trade statistics databases, including the United Nations Commodity Trade Statistics Database, do not provide statistics on SBT fillets.

Such monitoring and analysis would allow members and CNMs to re-visit the need for mandatory tagging of fillets, or packets of fillets, at the next review of the CCSBT CDS.

ISSUES WITH INDIVIDUAL CDS FORMS

Australia has identified a number of minor issues with some of the text in the Catch Monitoring Form, Catch Tagging Form and Re-export and Export after Landing of Domestic Product Form. These issues mostly result from ambiguous language that has proven difficult to interpret at an operational level, and suggested amendments to the text are provided below. The costs associated with printing new sets of CDS forms do not warrant making these amendments in isolation; however, they could be incorporated if and when more significant revisions to the CDS forms are agreed.

Catch Monitoring Form (CMF)—Instruction Sheet

GENERAL INSTRUCTION BOX

The intent of the general instructions is to specify that the Catch/Harvest and Final Product Destination Sections of the CMF must always be completed by the time of first sale on domestic or export markets. However, some catchers/harvesters have interpreted these as meaning they are required to complete both sections, which they are unable to do, particularly when product is exported. The intent of this general instruction could be clarified as suggested.

Suggested addition: *'The Catch Monitoring Form has 3 main sections: (1) Catch/Harvest; (2) Intermediate Product Destination; and (3) Final Product Destination. Catch/Harvest and Final Product Destination sections must always be completed by the time of first sale on domestic or export markets.'*

CATCH HARVEST SECTION

CATCH HARVEST SECTION - tick and complete only one part

The design of this section of the instruction sheet and form itself has led to some catchers of wild fish providing only the name of the catching vessel, registration number and flag state/fishing entity, without providing any details on the description of fish.

Suggested amendment: *'**CATCH HARVEST SECTION** - tick only one part and complete Description of Fish and Validation'*

In the Catch/Harvest Section of the form itself, additional space is required to accommodate the name and address of the processing establishment.

FINAL PRODUCT DESTINATION SECTION

LANDING OF PRODUCT FOR DOMESTIC SALE

There are no instructions specifying that the receiver or buyer of a consignment of SBT must not be the same entity as the catcher/harvester, which may subvert the intent of the CDS to track and validate the legitimate product flow from catch to the point of first sale on domestic or export markets.

Suggested addition: ***'Certification of domestic sale: The person or company that receives southern bluefin tuna from a domestic vessel for the purpose of domestic sale must provide his/her/its name, address, signature, and date (dd/mm/yyyy) on which the southern bluefin tuna was received. Each buyer must also provide his/her name, address, signature, date (dd/mm/yyyy) on which the southern bluefin tuna was received, and weight purchased. The receiver or buyer must not be the person or entity that caught/harvested the southern bluefin tuna.'***

Further, the address block in the form itself could be modified to allow one receiver only and one buyer only to be listed, with a tick box if the receiver and buyer are the same entity. By way of design, the address block currently allows multiple receivers/buyers to be listed, which appears to be in conflict with the instruction that split shipments are not allowed.

Receiver: Name	Address	Date	Weight (kg)	Signature
Buyer: Name	Address	Date	Weight (kg)	Signature

Tick box if receiver and buyer are the same person or entity

VALIDATION

An instruction should be added to remind persons validating the Catch Harvest Section to validate each carbon copy of the CMF.

Suggested addition: ***'Validation by Authority (not required for transhipments at sea): If this is not a transhipment 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 on each carbon copy of the Catch Monitoring Form.'***

Re-Export and Export after Landing of Domestic Product Form (REEF)

EXPORT SECTION

Name and address of processing establishments

Additional space is required in the Export Section of the REEF itself to accommodate the name and address of the processing establishment.

Footnote on verification of copies

The footnote instructing the organization/person validating the export section to verify the copy of the original CCSBT CDS documents does not specify how these documents must be verified (e.g. stamped, signed, dated). Members should agree on what is required for verification.

VALIDATION

An instruction should be added to remind persons validating the Export Section to validate each carbon copy of the REEF.

Suggested addition: ***Validation by Authority (not required for transshipments 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 on each carbon copy of the Catch Monitoring Form.*