



THIRD REGULAR SESSION

Apia, Samoa

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**Memorandums for further consideration regarding
suitability and applicability of
Statistical Document/Catch Document
in the context of WCPFC**

WCPFC3-2006-DP17

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Prepared by the Japanese delegation

Since the second regular session of the Commission in 2005, arguments regarding statistical documents and catch documentation have not advanced significantly in WCPFC. Japan's proposal to introduce Statistical Document Program (SDP) on Bigeye, which was already implemented by all other tuna RFMOs and was supported by several Members, was however rejected by some Members of WCPFC because of their general preference for Catch Documentation Scheme (CDS).

At the second session of the Technical and Compliance Committee (TCC) in October 2006, similar discussion to WCPFC2 was occurred and the TCC failed to conduct detailed technical discussion to be anticipated. Although Japanese delegation submitted its explanatory note in this regard (TCC2-2006/DP4) for consideration by Members, there are no counter arguments against the specific points that were raised by the paper. Consequently, it still remains to be clarified fully why SDP is not relevant for WCPFC and CDS instead is necessary. In addition, technical difficulties Japan pointed out regarding the implementation of CDS in the case of Bigeye of WCPO, in contrast with the case of CCAMLR, were not well countered by the Members that supported CDS.

To date, Japan did not received any specific suggestions from Members regarding the Japanese original proposal on SDP, although general comments already expressed in previous session of WCPFC are notified. Because of the absence of the specific suggestions by other members, Japan is unable to improve its proposal on SDP.

In order to further contribute to the discussion at the third regular session of the Commission (WCPFC3), Japan herein prepared additional tables and figures which highlight the points to be considered by the Commission. Japan considers that having well focused discussion regarding specific technical points rather than exchanging general opinions and preferences would enable the Commission step further.

Table 1 is an expanded version of the comparison of various parameters between CDS (Toothfish of CCAMLR) and SDP (BY of WCPFC). From Japan's point of view,

there are significant differences between two different fisheries and associated schemes. These facts imply that comprehensive application of CDS for bigeye in all the WCPFC Members is almost impossible because there are many technical difficulties. In particular, developing Members may be unable to comply with the requirements.

Table 2 is another table of comparison in which policy implications for these two schemes were listed and considered. These points, in Japan's view, support the SDP as a feasible and effective measure in order to combat IUU fishing. Table 2 also signifies the difficulties associated with implementation in CDS. Even if it is implemented, it entails significant transaction costs and unnecessary burden to legitimate fishermen as well as to government authorities. In addition financial and administrative implications of the Commission in administering the CDS also need to be considered.

Since this Table 2 is not completed, the Commission need to consider further the relevant points in this table. Since the author of this paper is unable to fill the column on the side of CDS, the Member that support CDS is kindly requested to submit its reasoning and feasibility in detail to support the CDS. The basic point above all is that the reason to introduce CDS despite perceived transaction costs and burdens was not clearly demonstrated.

The last page of this paper shows the conceptual diagrams regarding the catch composition of Bigeye and Toothfish by members and non-members and its destinations. Previous Japan's explanatory note already explained that the case of CCAMLR could not be a reasonable analogy for WCPFC because of the lack of focused policy objectives and other measures to be combined. In addition to this, attention should be paid to the facts that the area "D" of Bigeye (Fig.1) is far larger than that of toothfish (Fig.2); this is because of the substantial volume of Bigeye which is caught by non-members and/or exported to non-members (e.g., Thailand).

We recall that the general preference for CDS expressed by some members seems to be because of its comprehensive coverage. But in the reality of WCPO, preferred comprehensiveness could not be achieved even if CDS is introduced. This means only the governments and fishermen of WCPFC members will be burdened while non-cooperating non-members continue to be exempted from the application of CDS. In this sense, what is intended and what should be achieved under CDS, with incomplete coverage, need to be fully explained in the context of WCPFC.

For the sake of fairness, Japanese side admits that SDP is not *per se* almighty for combating IUU fishing. SDP intends to obtain information on origins of fish through international trade and hereby identify the source of IUU fishing because most of IUU fishing is export driven. When it is implemented with other measures such as Positive list and IUU fishing vessel list, SDP could contribute to prevent IUU fishing products from entering into international markets. The utility of SDP as a feasible and effective tool is already recognized by other tuna RFMOs.

Finally, SDP and CDS are not mutually exclusive in their natures. In this sense, considering CDS further can not be a reason to block introducing SDP in WCPFC as an immediate step. In the case of CCSBT, the Commission meeting in 2006 agreed to continue its discussion with a view to introducing CDS on SBT replacing with existing SDP. At the same time, CDS entail significant technical and financial problems to implement successfully, which needs thorough consideration at respective forum taking into consideration the situations of fisheries in question. SDP is a good approach in order to accumulate experiences on this kind of scheme in WCPFC and continue to consider the desirability and feasibility of CDS.

Table 1: Comparison of various parameters and facts between Toothfish and Bigeye

	Toothfish	Bigeye
Catch amount	<i>34,000 MT</i>	<i>120,000 MT</i>
Number of vessel	<i>< 30</i>	<i>> 5,000</i>
Gear	<i>LL</i>	<i>LL, PS, PL, etc.</i>
Product type	<i>Frozen</i>	<i>Fresh, Frozen, etc.</i>
Fishermen involved	<i>Limited (well organized with capitals and equipped with modern technologies)</i>	<i>Countless (includes small-scale and artisanal fishermen)</i>
Landing port	<i>Limited</i>	<i>Countless</i>
Non-members	<i>A few</i>	<i>Many</i>
Export to non-CCMs	<i>Negligible</i>	<i>Large (e.g., Thailand)</i>
Distribution pattern	<i>Relatively simple (export to/domestic consumption in limited developed nations)</i>	<i>Well varied (from local consumption to international trade, from canning to sashimi)</i>
Markets	<i>Focused (limited number of developed nations)</i>	<i>Numerous</i>

Table 2: Points to be considered on SDP/CDS in the context of WCPFC

	Statistical Document	Catch Document
Immediate Purposes	To identify the national/vessel/ocean origins of the tuna caught in international trade	?
Coverage	Catches by both CCMs and non-CCMs and are exported to CCMs	Catches by CCMs
Policy Targets	IUU fishing states/vessels that export their harvests to CCMs	?
Measures to be combined	- Positive list - IUU negative fishing vessel list - Trade restriction against a nation	?
Expected effects	- the catches by non-CCMs will be quantified - harvests by IUU fishing will be rejected from CCM members	?
Actors responsible	Both exporting and importing CCMs	Flag CCMs
Transaction costs for gov.	Medium (required only in international trade)	High(always required)
Burden for fishermen	Low	High
Commission Budget	Low (administered by CCMs)	High (Secretariat's function needed)
Feasibility	High (already implemented by all other tuna RFMOs)	Low (technical difficulties entailed)
Urgency	High (to combat IUU fishing)	Low
Compatibility with other tuna RFMO	High (ICCAT, IOTC, IATTC, CCSBT)	None
Suitability for WCPFC	High	Low

Fig.1 Bigeye in WCPO

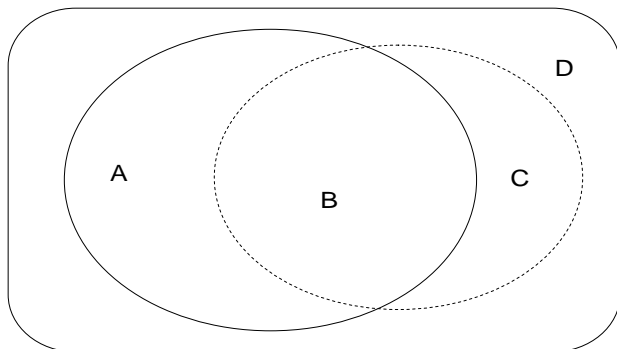
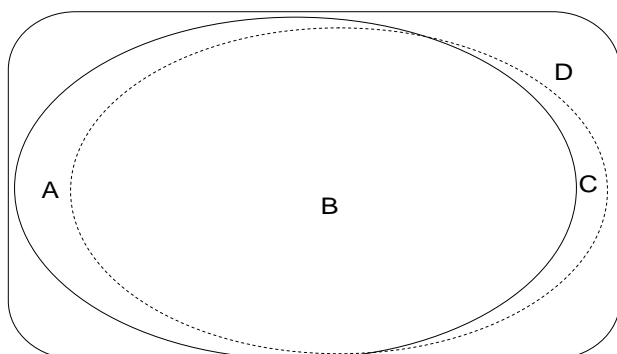


Fig.2 Patagonian toothed fish



Rounded square: All the catch by CCMs and non-Members

Circle of solid line: Catch by CCMs

Circle of broken line: Catch for international trade

Area A: Catch by CCMs for domestic distribution

Area B: Catch by CCMs for export to other CCMs

Area C: Catch by non-CCMs for export to CCMs

Area D: Other catches not covered by A, B and C (e.g., catch by non-CCMs for their domestic distribution or export to other non-CCMs)