



TECHNICAL AND COMPLIANCE COMMITTEE

THIRD REGULAR SESSION

27 September – 02 October 2007

Pohnpei, Federated States of Micronesia

BASIC QUESTIONS ON CATCH DOCUMENTATION SCHEME IN WCPFC

WCPFC-TCC3-2007/DP06

21 September 2007

Paper prepared by Japan

Whether we refer to catch documentation scheme (CDS) or to statistical document program (SDP), what lacks in this forum is a focused discussion on the specific aspects of proposed scheme, in terms of both theory and practicality. In other words, why proposed scheme is necessary, what it aims at in pursuing any management objective, and how it will be implemented in the real situations of WCPO fishery, are the imperative points if we are to further the discussion.

For this sake, Japan already submitted its discussion paper (WCPFC3-2006-DP17: attached to this paper) at the 3rd session of the Commission. In that paper, Japan underlined some problems in light of the utility and practicality of catch documentation scheme, by introducing various parameters and facts of tuna fisheries in WCPO for reference. However, because of the lack of time available at the plenary, such focused session was not realized in the previous session of the Commission. Although some of the points listed may need to be amended and complemented, Japan would like other members look again at this document, since basic propositions of the paper are still relevant. Japan highly welcomes the response and inputs by other members on specific points in the paper.

In addition to the points noted in the paper (WCPFC3-2006-DP17) Japan herein listed very basic practical questions on CDS for your considerations and comments. These are not particular problems only for Japan but the ones other members including developing nations may be concerned. If CDS is to be introduced, it must be

implemented by the all the vessels operating in the WCPO regardless of nationality and type of vessels in order to fulfill its purpose. By doing so, however, it causes many practical problems that may hinder legitimate tuna fishing activities of members. Japan would like to consider further jointly with other members whether CDS needs to be introduced in spite of these difficulties.

Q1: How mixed-harvests caught and stored by purse seiners can be identified species by species and be accurately documented?

This is an almost impossible task to separate and count fishes by species particularly when a bulk of multi-species harvested by purse-seiner will be destined to cannery or processing factories.

Q2: How landings at a considerable number of domestic ports including those of developing nations be monitored on real time basis?

This is physically impossible to cover all the coastal landing sites with supervisors at 365 days-24hours for validation, although catch information may be obtained by alternative methods.

Q3: How large amount of tunas to be landed at or exported to non-members be adequately covered?

This is one of the most fundamental problems in implementing CDS in WCPFC, where a number of non-members (e.g., Thailand) are importing tunas caught in WCPO.

Q4: How large amount of tunas caught by the vessels of non-members be adequately covered?

This is also a fundamental problem in implementing CDS in WCPFC. As observed in Q3 and Q4, insufficient coverage of tuna catch and its distribution due to the presence of non-members of WCPFC makes CDS malfunctioned unfortunately.

Q5: How clearance of custom at importing countries be proceeded without spoiling the quality of fresh products?

In fact, considerable amount of “fresh” tuna such as bigeye are exported to Japan from wide variety of nations and its total amount is far larger than fresh bluefin tuna and southern bluefin tuna carried into Japan. For example, amount of fresh

bigeye that was exported to Japan in current years is shown in the Table 1. In addition, the total number of commercial lot in which fresh bigeye was packed and distributed will be far larger than those of BFT and SBT because Bigeye's size is smaller than BFT and SBT. Because of these facts, if CDS is strictly enforced in Japan with current capacity of government administrative services, more prolonged time may be required in proceeding custom clearances; consequently the quality of products and flexibility of business transaction may be affected.

Please note that these are non-exhaustive list and other important questions may occur to us. If every member could share Japan's points, subsequent interactions among members in this regard would be well grounded on real situations surrounding WCPO fishery.

Table 1: Fresh Bigeye exported to Japan

Unit: ton

	2004	2005	2006
PNG	390,820	219,000	164,900
USA	102,611	167,446	84,632
Guam (USA)	877,570	369,685	964,127
US-Samoa	0	0	396
Australia	738,691	553,423	334,972
Canada	19,277	3,031	4,945
Cook Islands	15,610	5,839	2,782
Samoa	0	0	599
Solomon Islands	442,440	19,285	0
Tonga	4,535	24,780	20,284
New Caledonia	36,712	23,110	812
New Zealand	166,271	118,803	129,823
Palau	690,525	1,812,583	2,883,466
Fiji	455,944	305,826	279,873

Philippines	433,767	728,905	674,428
Marshall Islands	556,927	213,663	11,876
FSM	677,468	96,423	301,130
Chinese Taipei	990,259	624,065	411,767
China	0	1,065	175
Malaysia	97,669	79,512	150,182
Thailand	1,274,870	635,916	821,511

Total (include other states)	19,066,923	16,930,229	15,876,070
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THIRD REGULAR SESSION

Apia, Samoa

11-15 December 2006

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

WCPFC3-2006-DP17

6TH December 2006

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

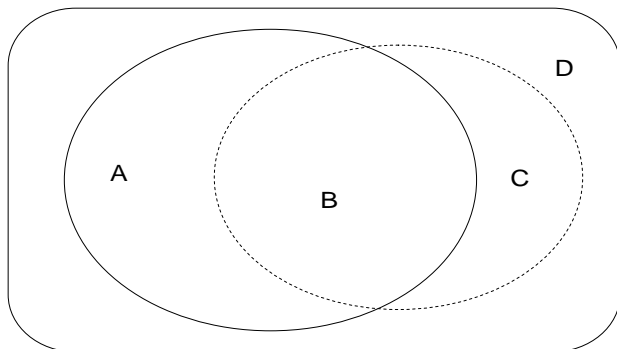
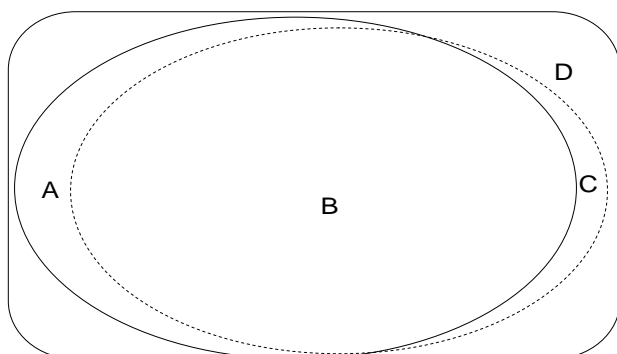


Fig.2 Patagonian toothed fish



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)