



**CATCH DOCUMENTATION SCHEME INTERSESSIONAL WORKING GROUP**  
**Wednesday 24<sup>th</sup> September 2014**  
FSM-China Gymnasium, Palikir,  
Pohnpei, Federated States of Micronesia

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**CDS DEVELOPMENT DISCUSSION PAPER**

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**WCPFC-2014-CDSIWG-DP01**  
**23 September 2014**

**SUBMITTED BY FFA MEMBERS**

## CDS development discussion paper

### Introduction

1. The WCPFC Catch Documentation Scheme Working Group Terms of Reference was used as a basis in the preparation of this discussion paper. It is premised on a “bottom up” approach which builds on, enhances and links existing MCS tools in a manner which avoids duplication and replication of existing data collections and validation mechanisms such as, logbooks, export declarations and the role of observers and inspectors. Failure to do so will compromise the chances of regional agreement, impacting on Small Island Developing States:

- Domestic Development: there is a need to ensure that operators are not disadvantaged, especially smaller scale operators;
- Fisheries Agencies: there is a need to minimise and mitigate additional burdens on small administrations.

### Issues & Analysis

#### ***Catch/Trade Certification Requirement***

2. In any CDS or Trade Information Scheme (TIS), fish product cannot be traded unless certified and accompanied by a Validated Catch or Trade Documentation, referred to hereon as a *Catch Certificate*.

3. As such there are two issues of scope arising, tied to defining:

- “Traded” – at a minimum, this would be the import, export or re-export of catch. Secondary would be the domestic sale of catch (not traded catch):
  - For the Pacific, there are significant hurdles to address given that this would include artisanal fisheries from several members.
  - Catches by fleets into their ports and/or territories need to be covered in some way by the CDS, especially where the catches involved are substantial, as with bigeye landed by Japanese vessels into Japan, swordfish landed into Papeete by Spanish longliners, purse seine catches landed by US purse seiners into Pago Pago, and catches of domestic Philippine vessels into Philippine canneries. Non-coverage of such catches is a pressing reason to move forward on a WCPFC CDS.
- “Catch” – the starting point would be major target tuna species (BET, YFT, SKJ, ALB). The system should be designed for scalability and extendibility to other species based on factors such as:
  - Importance to FFA Members: species important to FFA Members need to be included especially where a WCPFC CDS can contribute to improved information and management of those stocks;
  - Management status: species that are the focus of CMMs need to be included;
  - General applicability: it is not worth developing a CDS for specific, relatively low catch volume species which cannot be applied to the larger catch volume species; and

- Priorities for other CCMs (EU and Japan have proposed Bluefin tuna, sharks (all key species), and swordfish).

**Validation Process - What is Being Validated/Verified?**

4. The fundamental question: What does validation involve?
  
5. The Validating Authority is essentially certifying that the catch involved complies with certain requirements.
  
6. Typically, RFMO CDSs:
  - Verify that the catch has been undertaken by an authorised vessel. Some also verify or allow verification of whether the catch has been taken in accordance with RFMO conservation measures, but this varies;
  - Aggregate catch volumes declared in the trade/catch certificates to ascertain the extent to which catches traded are consistent with fleet-based catch limits. This may be of limited relevance in the WCPFC in the future where zone-based are being generally pursued; and
  - Verify and validate compliance at various links in the commodity chain e.g. from catcher vessel to carrier vessel, from carrier vessel to fish receiver, from fish receive to processor, from exporter to importer etc.
  
7. FFA Members would want to add a degree of verification that the catch was taken in accordance with national laws since most catch is taken in national waters and the market States are also looking for this assurance.
  
8. Consideration will need to be given as to how a Validating Member is able to ascertain that a particular shipment has been undertaken in ways that comply with all relevant requirements. This should be one which minimises the burden on SIDS administration, maximises flexibility to industry, and is risk-based.
  
9. One possible approach consistent with meeting the three objectives set out above, including the provision of scientific information is that the Validating member must:
  - Ensure and certify that a logsheet and landing report for the trip has been provided to the coastal states in whose waters the vessel has operated; and
  - Have an appropriate MCS system in place to be able to certify that the logsheet and landing report are accurate and that the vessel has complied with WCPFC CMMs and national laws, including the Validating member having access to VMS tracks to verify reported activities if necessary.
  
10. This means that the Validating Members needs to be in a position to certify that the catch has been taken in accordance with the requirements of licensing coastal states. It might be desirable to require the formal concurrence from a coastal State that catches were taken in accordance with national laws, but at the same time, care is required not to burden coastal SIDS national authorities unnecessarily.
  
11. In the regional context a key validation requirement would require a uniform reference, i.e. a database, of persons either seeking or associated with product which requires Catch Certificates for Export. A centralised database of “user accounts”, similar in operation to the FFA Vessel Register would be required. The database would have the functionality of automatically generating unique Export IDs, subject to application and validation rules being met.

An example of an application rule:

- Catcher Boats Unique Trip ID is provided. The trip ID used by SPC and consistent with the HMTCs is a combination of the VESSEL NAME, TRIP START DATE, TRIP END DATE. The trip ID is the linkage to the Catcher Boat's logsheets.

An example of a validation rule:

- Catcher Boats logsheets have been received (the database would have to cross match with TUFMAN)

12. For the purpose of traceability the Unique Export ID needs to link to the Unique Trip ID. Agreement on a standard Unique Export ID is required. A comparison of existing national export ID systems should be undertaken.

13. Specifications and further background for the development of such a database are provided at Attachment A. From such a database, one can consider the forms of validation that may take place.

#### ***Validating Authorities – who can validate?***

14. A key requirement for a regional or sub-regional certification process is recognition of one another's Validating Authorities. Certain standards would need to be agreed and met. This has the advantage over national standards where each coastal State has to demonstrate that their individual standards meet the requirement of States requiring import assurance.

15. With the approach set out above, a Validating Authority would need the assurance that logsheets and landing reports have been provided to coastal States and relevant regional bodies with an appropriate MCS system including access to VMS tracks to be able to give an assurance that the catch has been taken in accordance with WCPFC CMMs and national laws. With this approach the Validating Member could be a flag, port, coastal, charter or processing State (as already proposed by Japan) provided it could meet these standards.

16. Questions posed include:

- Legal authority – “appointed government officers” is the standard and universally agreed approach; however, should scope remain to subcontract these services or to ensure that the role of industry, individual or cooperatives are not discounted from having a role in the validation process?
- Accreditation and Audit – what assurances are required to ensure that minimum standards are being met when it comes to monitoring and control processes so that statements of validation by one member are acceptable for issuance of a Catch Certificate by another. Should someone have an audit role to check and confirm compliance with validation standards?
- When does validation occur – this could occur at various stages in the commodity chain of the product, landing, processing, export, import etc?
- Notification – a register of Validating Authorities would need to be maintained.

#### ***Data and Catch Certification Dissemination***

17. The verification of catch and declaration of catch quantities at point of export is of utility to a number of stakeholders in the products' chain of custody. Rules for access to and dissemination of data would need to be developed, with consideration of:

- What and when can industry (exporter, catchers or processor) access catch certificates and data of relevance to their handling of the product;
- A potential WCPFC CDS, with such a validation process agreed and in place the CDS would have to recognise the procedures and the data stemming from it. There may not even be a need to provide data only the unique ID which can be traced back to the catch;
- Importing States, including re-exporter (third party States) can be provided catch verification details and assurance of certification; and
- It is likely that a CDS developed as noted above will not by itself meet EU requirements for flag State validation. There may need to be an additional requirement for this to occur, although a WCPFC CDS accepted by the EU would make this a routine action based on the fact that the catch has already been validated by an appropriate WCPFC Member.

## **ATTACHMENT A: ELECTRONIC CDS SPECIFICATIONS**

### **Introduction**

The basic characteristics of traceability systems are:

- identification of units/batches of all catch/species,
- information on when and where they are moved or transformed
- a system linking these data.

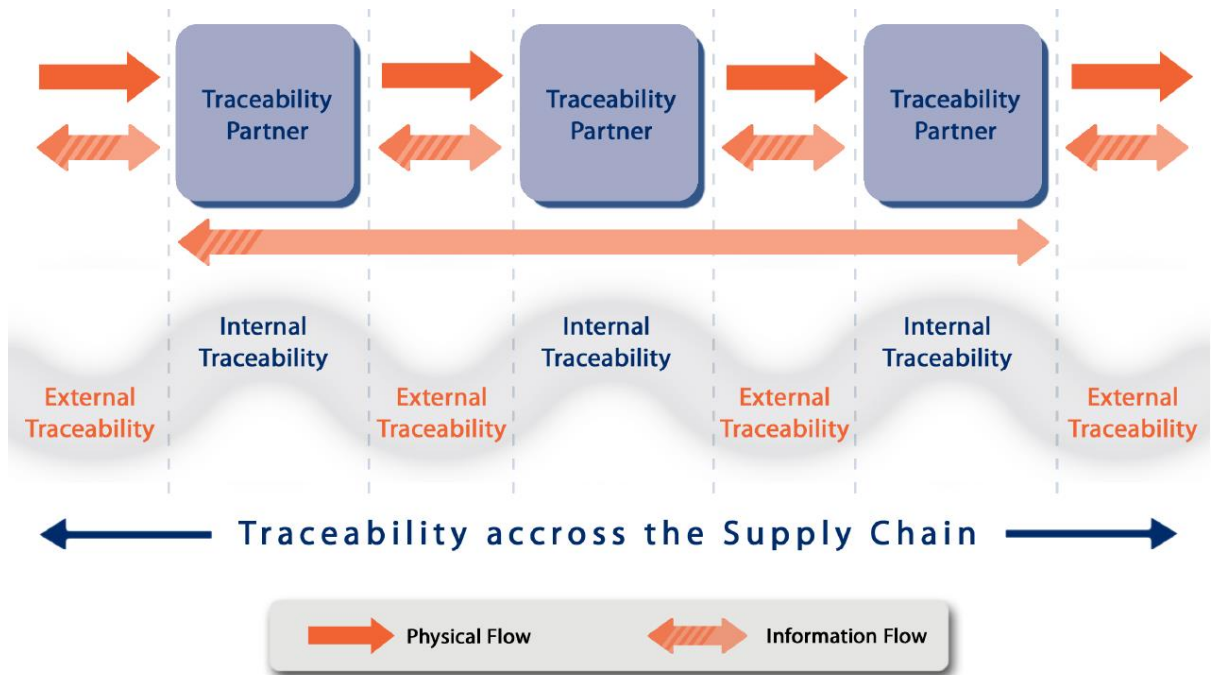
Having traceability of catch means having the ability to answer 5 key questions about inputs, production, and outputs:

- \_ Where did it come from?
- \_ How did it get here?
- \_ What did we do with it?
- \_ Where did it go?
- \_ How did it get there?

To manage traceability across the supply chain, either 1. associate information flow with the physical flow of traceable items, either manually step-by-step, as depicted on the Figure below , or 2. via a centralized traceability data storage and retrieval IT solution (e-solution). The first has been what traditional RFMO CDS have opted for. The second option would however be truer to the principles and objectives as set out in the CDS WG ToR.

The system should be designed to assign a unique ID number and track each [catch / trip] of fish as it moved through the supply chain, allowing customs officials, enforcement officers and buyers to verify the tuna's origin and legality. This will require at a minimum:

- A central, secure database storing the data generated by the eCDS that can be accessed easily by authorized users.
- A bar-coding system that allows operators to generate a physical label, linked to the eCDS system, which would allow [consignments/ individual fish] to be tagged and easily tracked through the supply chain.
- A requirement that all information contained in the eCDS to be checked and validated by the appropriate authority before the fish could move through the supply chain.



Note:

- Internal traceability is a process that takes place when a traceability partner some traceable items (goods), processes them somehow and outputs some instances of traceable items (which may or may not be the same as in the beginning). Internal process is a process or set of sub-processes without significant involvement of other trading partners. It may include movement, transformation (such as mixing or cooking), storage, or destruction (waste). The traceability partners must maintain their internal traceability information, and may or may not display it to their partners.
- External traceability takes place on handing over the traceable item between traceability partners. Each partner must be able to trace traceable items going through him one step back to its direct source and track it one step down, to its direct recipient. Moreover, each item must carry unique identification during the whole chain until it is consumed or destroyed. The uniqueness is ensured by the brand owner. This all ensures that the traceability partners must not hold all the information about items, but they are able to communicate the whole chain.
- Industry (catcher, transporter, processors etc) would be required to identify traceable units inside of its internal process, know what is happening with them and link its inputs and outputs to the unique identification in the global chain.

#### Technical requirements

- The system should be done in a way that allows it to be interconnected with other Members existing software / databases without need for any major changes, so that the whole traceability solution is not WCPFC system-dependent.
- The system should be able to receive electronic messages from all actors in an agreed exchange format.
- The centralised database architecture or combination of distributed and centralized database architecture is required. Most likely a combined architecture to be used, because existing systems e.g. SPC Databases can be used to make the implementation easier. The system will thus have distributed nature with data kept

at industry, members or subregional hubs used as cache for making statistical data easier to fetch and allow centralized provision of the data.

#### **Non-technical requirements**

- The system must allow all [ domestic trade] to be recorded, store information about buyer and seller, species, weight and other fish product properties.
- The system must be able to store yield factors and provide users with functionality to verify whether resulted product can be made from specified inputs provided the yield factors are known to the system. As there are a lot of yield factors, it is difficult to keep them correct, so system should provide a way how to gather statistical information on the yield reported by different participants to allow to make predication models of yield factors.
- The system must be able to keep track of mixing and splitting contract/catch/landing notes. That means not only store information about it, but also be able to trace/track which products can be “contaminated” by IUU fish and what catches can specific product contain.
- The system must keep track of state in which the fish are in each step – frozen, dried, chilled.
- Correctness of information about every transaction must be entered into system by the transaction originator and confirmed by the recipient.
- Correctness of information about every transaction must be verifiable by the respective authorities and the recipient.
- To detect whitewashing, the authorities must be able to verify amount of fish at every step with the originating catches lowered by the yield factors.
- The system should be able to establish statistics related to quotas, contract/catch notes, export, production, consumption, waste, yield factors etc. as a way to identify possible IUU fishing.
- The system should be able to issue catch certificates at any point of the fish chain to document the legality of the fish received at the issuing actor.
- Audits to be initiated automatically on a periodic basis by choosing a sufficient number of completed catch certificates. Audits will also be initiated for circumstances where the risk of misinformation or misleading information is likely to occur.

#### **External prerequisites**

- Fish Receiver, Processors, Transporters involved in the joining, splitting or processing of fish products will need to establish an internal traceability system to keep track of such activities.