



2nd MEETING OF CATCH DOCUMENTATION SCHEME INTERSESSIONAL WORKING GROUP

FSM-China Gymnasium, Palikir,
Pohnpei, FEDERATED STATES OF MICRONESIA

21 – 22 September 2015

BACKGROUND ON WCPFC CDS-IWG ACTIVITIES 2014/15

WCPFC-2014-CDSIWG02-02_rev1¹

1 September 2015

Paper by the WCPFC Secretariat

Purpose

1. This paper overviews the progress made by the WCPFC Catch Documentation Scheme Intersessional Working Group (CDS-IWG), with an emphasis on activities in 2014/15. To assist the CDS-IWG with its deliberations on the key elements of a WCPFC CDS, and noting there were very few comments received from CCMs on intersessional consideration of the key elements of a WCPFC CDS, this paper also provides a compilation of excerpts from relevant 2014-2015 documentation grouped under the five topics. The Secretariat expects that FFA will submit papers to CDS-IWG (2015) as an update on the third intersessional topic which was WCPFC-2014-CDSIWG-DP01.
2. CDS-IWG is invited to note the paper, and to consider the comments that have been provided as a basis to further develop the key elements of a WCPFC CDS.

Background

3. The WCPFC began discussing approaches to catch documentation schemes from as early as 2006. Discussions at that time were primarily focused on whether the WCPFC should adopt a *statistical document program*, to track international trade of a fishery product like bigeye for consistency with other tuna RFMOs, or whether WCPFC should instead develop a more comprehensive *catch documentation system* to track movement of fishery products from the point of capture through to market.² Presently of the tuna RFMOs, ICCAT, IATTC and IOTC have implemented statistical documentation programmes for bigeye tuna and ICCAT has also implemented a statistical documentation programme for swordfish. Catch documentation schemes are being implemented by CCSBT for Southern Bluefin tuna and by ICCAT for Atlantic Bluefin.

¹ Rev 1 includes editorial changes to paragraph 3.

² From Rahleigh Workshop on Harmonisation and Improvement of the trade tracking programs and development of catch documentation schemes (2010) "A Statistical Document Program (SDP) traces the international trade of a fishery product: Export -> Import/market. A Catch Documentation System (CDS) traces movement of the product from capture to market: Catch -> Landing -> Export -> Import/market & Catch -> Landing -> Domestic/market."

4. In 2010, WCPFC agreed in principle to the development of a catch documentation scheme as follow:
WCPFC7 agreed to form an intersessional CDS Working Group, to be coordinated by PNG, to progress work on an inclusive WCPFC CDS that includes flag, coastal and market States, and enables certification and export. It was agreed that the first consultation would involve the development of Terms of Reference (TORs) for the CDS Working Group. (WCPFC7 Summary Report, para 223)
5. The terms of reference for the CDS-IWG were agreed in December 2012 (WCPFC9 Summary Report, Attachment S), and Mr Alois Kinol (Papua New Guinea) was appointed to be the CDS-IWG Chair. The principal task of the CDS-IWG is “to develop and propose a strategy for a CDS to document catches taken in the WCPO for key target and bycatch species.” Through its work the CDS-IWG is to:
 - a. “be mindful” of the key principles contained in Attachment 1 to the CDS-IWG terms of reference;
 - b. “take into account” MCS and information collection systems of members; and
 - c. give “explicit consideration of” the list of items contained in paragraph 3 of the CDS-IWG terms of reference

The indicative timeframe outlined in the terms of reference envisaged the development of a provisional CDS proposal for consideration at WCPFC10 or WCPFC11, and trial introduction during 2014-15. A copy of the CDS-IWG terms of reference is provided as a reference document for CDS-IWG(2015).

6. The first CDS-IWG meeting was held on October 1 2013 in Pohnpei, it was a half-day meeting which commenced immediately following TCC9. Later that year, WCPFC10 received the report of CDS-IWG and endorsed the plan for the Secretariat to produce an analysis of existing CDS-related initiatives for discussion at a meeting of the CDS-IWG prior to TCC10.

2014 activities – review of existing CDS-related Member initiatives

7. In 2014, a workshop was held in Pohnpei, Federated States of Micronesia on 24th September - and the main document considered was a consultancy report (2014-CDS-IWG-02) that among others reviewed member submissions related to existing CDS-related initiatives. The gap analysis of CDS-data fields by the Consultants found that:
 - There are regional systems in place that meet virtually all of the CDS data field requirements, specifically that many systems meet most catch form requirements (documentation details, vessel data, catch information, description of fish sold, transshipment (at sea or in port) and certification of landing), and some systems meet most export form requirements (documentation details, export information, transport details, exporter certification, export governmental authority validation and import information); and
 - A move to a CDS will not require much change to the data already collected, but system rigor and processes will need to be improved.

8. The agreed output was a CDS-IWG workplan for 2015 (WCPFC11 Summary Report, Attachment O). This was attached in the report by the CDS-IWG chair to TCC10 (WCPFC-TCC10-2014-17). Both are provided as a reference documents for CDS-IWG (2015).

2015 activities - developing the key elements of a WCPFC CDS

9. There were two agreed steps in the 2015 CDS-IWG workplan:
 1. circulation by the Secretariat of a list of topics considered to be key elements for consideration by the CDS-IWG (draws on the consultant's report (2014-CDS-IWG-02) and the FFA delegation paper (2014-CDS-IWG-DP01); and
 2. a meeting of the CDS-IWG immediately prior to TCC11, to consider discussion papers based on the intersessional comments submitted.
10. Circular 2015/16 was sent to CCMs on 24 March 2015 confirming the 2015 process. Through this circular CCMs were requested to provide comments on the five intersessional topics from the 2015 workplan: the five intersessional topics were proposed by the CDS-IWG to comprise the key elements of a CDS.
11. In response, the Secretariat received one comment from a Member prior to the May 29 deadline, and one late submission of comments on the five topics from a Member in early August 2015. The Secretariat also understands that FFA intends to submit to CDS-IWG 2015 meeting, papers that update and expand on discussion paper WCPFC-2014-CDSIWG-DP01.
12. Noting the absence of many comments from CCMs on the four intersessional topics, the Secretariat has compiled excerpts from 2014-2015 documentation under each of the four key elements for a WCPFC CDS. The comments have been compiled with a view to supporting the CDS-IWG discussions on the key elements of a WCPFC CDS, and noting the expectation that FFA will submit an update of WCPFC-2014-CDSIWG-DP01. The excerpts compiled are taken from the CDS-IWG Workshop (2014) report which includes the outcomes of relevant workshop exercises, and if an intersessional topic was not specifically discussed at the workshop reference to the consultant's report (WCPFC-2014-CDS-02_rev1). Excerpts from the 2014 FFA paper (CDSIWG-DP01) and the comments from one Member (European Union) to the intersessional process are also included. To assist with CCMs review, the text has been provided and reproduced in different fonts, and each topic starts on a new page.
13. A brief introduction of the excerpts is provided under each of the topics. Note Topic 1 and 2 are considered together as a single topic, as there was some degree of overlap in the comments within the 2014-2015 documentation.

TOPIC 1 & 2: KEY ELEMENTS OF A WCPFC CDS

- 1. Identify roles and responsibilities for: vessel operators; coastal States; flag States; WCPFC Secretariat; market states; other stakeholders**
- 2. Commence the development of standards specifications and procedures, including verification**

14. The excerpts from 2014-2015 documentation include:

- i) Examples from the CDS Consultants report of possible reporting arrangement roles for flag states, port states, export government authority and import authority;
- ii) Excerpts from FFA paper: CDS-IWG-DP01 (2014) on the Validation Process and roles, and Attachment A that outlines the development of electronic CDS specifications;
- iii) Excerpts from EU comments specifically on CDS-IWG topics 1 and 2, and some specific comments in response to the FFA concept of validation as outlined in CDS-IWG-DP01 (2014).

Excerpt from CDS-Consultants report (WCPFC-2014-CDS-02_rev1, page 59),

Examples of reporting arrangements:

Flag State Issuing Authority

- issues catch documents to own-flagged vessels;
- adds or amends vessel information;
- completes anticipated landing information;
- issues Flag State Confirmation Numbers;
- can complete sales information; and
- can view full report for all own-issued documents

Port State Authority

- can access those documents for which it can provide a Document Identification Number AND Flag State Confirmation Number;
- completes verified weights landed;
- completes sales (recipient) information if necessary;
- issues transshipment or landing certificate.

Export Government Authority

- issues export or re-export documents (each with a unique Export Identification Number);
- enters export and import information (weights, dates, companies, destinations);
- issues Export Government Authority (export certification).

Import Authority

- can view export documents for which it can provide a Document Identification Number AND Export Identification Number;
- receives notification from the Secretariat when an export is reported to be on its way
 - Document Number; Export Number; Date authorised; Product type(s); Weight of fish exported under this document; Unlading city; and Name of importing company.

Excerpt from FFA paper: CDS-IWG-DP01 (2014)

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.

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.

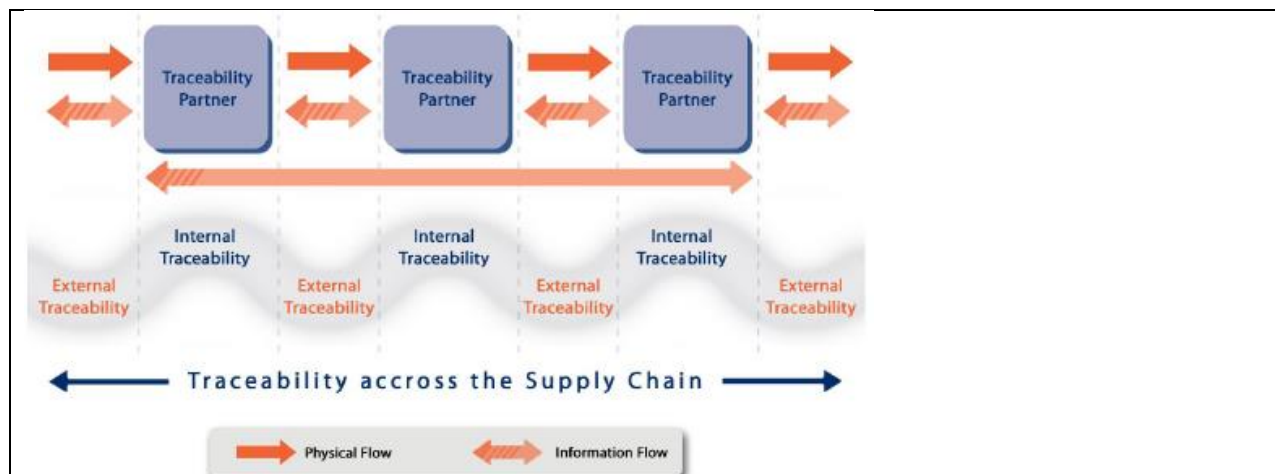
Having traceability of catch means having the ability to answer 5 key questions about inputs, production, and outputs:

- _ 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.

Excerpt from EU comments to Circular 2015_16

First of all we would like to highlight two very important issues:

- *The EU only accepts validation by flag State authorities and that such authorities are public authorities only. If the WCPFC decides otherwise, the EU would not be in any position to recognise the scheme under the EU IUU Regulation and it would merely become an additional document to the EU catch certificate upon exports to the EU.*
- *In addition, in order for flag States to validate a catch document it is necessary that they have access from coastal States to all information pertaining to the fishing activities of the vessel in question.*

In relation to topic 1: the discussion on identifying roles and responsibilities for all the stakeholders involved, I have attached the link to our handbook on the application of the IUU regulation. Section 5.12 gives a clear overview on how the EU considers the different roles of the stakeholders.

http://ec.europa.eu/fisheries/cfp/illegal_fishing/info/handbook_original_en.pdf

As for topic 2, development of standards, specifications and procedures, including verifications, we can refer to the IUU Regulation (1005/2008), in particular Chapter II on port inspections of third country vessels (based on the FAO Port State Measures Agreement) as well as Chapter III on catch certification scheme for importation and exportation of fishery products.

<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02008R1005-20110309&from=EN>

We have also some comments on the FFA paper which I believe should be also relevant to you:

- *We support the idea that CDS should be linked to other existing MCS tools and that duplication and replication of existing data collection and validation mechanisms is unnecessary.*
- *We agree that the scope and application of the scheme should extend to all fishery products traded in the region and support the idea to trial the scheme focusing on major target tuna species in the*

region (BET, YFT, SKJ, ALB).

Validation Process

- Existing CDS, could be used as a basis for outlining minimum information required for the validation of catch certificates in WCPFC (refer to point 6 of FFA's discussion paper).
- We welcome the proposal to insert an additional level of verification certifying that the products are caught in line with national laws - these potentially being more stringent than CMM of WCPFC. In practice however we believe that for many countries in the region providing this additional level of certification will be problematic. This because for many countries the rules and regulations governing their national waters are outdated (e.g. outdated Fisheries regulations and Tuna Management Plans).
- Point 8 and 9 of FFA's paper refers to the steps/options a validating member must take to ensure that certification complies with all the relevant requirements for the shipment (e.g. coastal, port and market state rules). To recall that IUU Regulation requires countries to certify that catches were made in line with the applicable laws, regulations and international CMMs. Our experience in the region shows that rules and controls governing both catch and trade of fishery products are opaque, often inaccessible to operators and other governments and in some cases obsolete and invalid. To minimise the burden on SIDS and for this system to work in practice all data, fishery management plans and national legislation pertaining to the management and trade of fishery products would have to be updated, transparent and accessible to validating members.
- Our experience has shown that even at the government level exchange of information and data pertaining to fisheries management is very limited and content of bilateral agreements restricted to the parties involved. Cooperation between validating authorities of member countries is often missing. To date we have seen no record of a validating authority requesting data from another coastal state. It appears that authorities are reluctant to contact one another prior to validation of information and that these same governments are very reserved when it comes to sharing data on their nationals. Thus, it would seem very unlikely that these same authorities would support the development of a centralised database containing all fishery data for the region.
- The fisheries data management tool used by PNA members in the region – Fisheries Information Management System (FIMS) - is one example of an existing data base which lacks transparency even for use by its own members. Flag states do not have access to data concerning their own vessels operating in neighbouring coastal states i.e. VDS days allocated in one coastal state cannot be verified by the flag state through the system. The current FFA proposal refers to trip ID information which would require each operator in the supply chain to be able to verify fishing trip data, including VMS tracks. Currently VMS data is only accessible to the flag state and the coastal state in which vessels are operating.
- The current FFA proposal includes an added layer of information pertaining to rules and regulations of flag, coastal and market states. In our experience it has been difficult to obtain information on benchmarks and limits for capping of effort in some of the regional countries as they consider this information to be confidential. It would be unlikely that this information could in the future be accessible to all players in the supply chain through a centralised data base.
- With regards to the final section on validating authority, we would like to reiterate its position as to the flag state authority being the only authority in a position to validate catch certificate by virtue of its responsibility in relation to the vessels activity at sea and the obligation of Article 94 of UNLCOS.
- Following the ITLOS No 21 case discussions the prominent role of flag States has been clearly confirmed: flag States have clear responsibilities to control their vessels and there is an obligation for the flag State to act 'with due diligence' to prevent and repress any unlawful act of their vessels;

TOPIC 3: KEY ELEMENTS OF A WCPFC CDS

3. Objectives: use sub-elements of consultant’s recommendation 1 as a basis for further discussion (note: may need to revisit as roles and responsibilities are clarified)

Consultants Recommendation 1:

The following objectives for a WCPFC CDS be adopted:

- Identify, quantify and/or validate the catch of WCPFC CCMs to confirm compliance with CMMs and facilitate market access through catch traceability;*
- Provide a mechanism to identify and account for IUU fish caught in the WCPFC-CA and provide a means of preventing such product from entering markets; and,*
- Supplement and reinforce catch reporting to strengthen scientific stock assessment activities*

15. The excerpts from 2014-2015 documentation include:

- iv) Excerpt from CDS-IWG Workshop report and group exercises on what priority objectives should be for a WCPFC CDS;
- v) Excerpt from FFA paper: CDS-IWG-DP01 (2014) in reference to the Validation Process and roles; and
- vi) Excerpt from EU comments specifically in response to the FFA suggestion on priority for the CDS.

Excerpt from CDS-IWG Workshop 2014:

12. There was general support for the objectives proposed in recommendation 1. Suggestions were made to refine or clarify some of the objectives (revising objective 3 to reflect principle 2(c) in CDS-IWG TOR, add verification to objective 1) and to include a specific reference to “compliance with national laws”. Some participants also suggested that objectives 1 and 2 might be higher priority than objective 3, because of the importance of addressing IUU and traceability. There were also comments regarding the broad nature of the objectives and the need to refine them further. Participants reiterated that implementation should be phased.

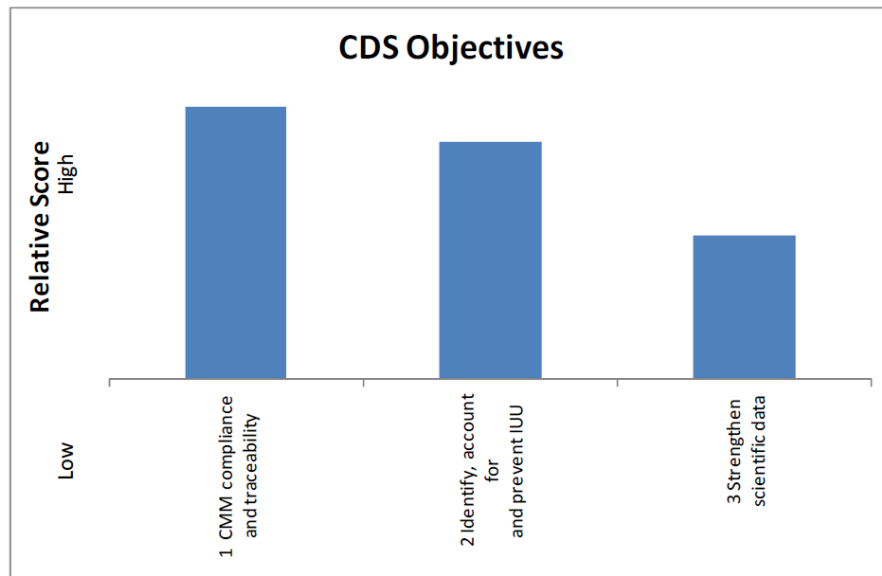


Figure 1: Outcomes from Workshop Exercise 1: Recommendation 1.

13. The workshop exercise identified that participants had some reservations as to the utility of a CDS to supplement and reinforce catch reporting to strengthen scientific stock assessment activities (Figure 1).

Excerpt from FFA paper: CDS-IWG-DP01 (2014)

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.

Excerpt from EU comments to Circular 2015_16

First of all we would like to highlight two very important issues:

- *The EU only accepts validation by flag State authorities and that such authorities are public authorities only. If the WCPFC decides otherwise, the EU would not be in any position to recognise the scheme under the EU IUU Regulation and it would merely become an additional document to the EU catch certificate upon exports to the EU.*
- *In addition, in order for flag States to validate a catch document it is necessary that they have access from coastal States to all information pertaining to the fishing activities of the vessel in question.*

We have also some comments on the FFA paper which I believe should be also relevant to you:

- *We support the idea that CDS should be linked to other existing MCS tools and that duplication and replication of existing data collection and validation mechanisms is unnecessary*

TOPIC 4: KEY ELEMENTS OF A WCPFC CDS

4. Scope: Use consultant's recommendation 2 as a basis for further discussions

Consultants Recommendation 2:

The WCPFC CDS should be designed to be as inclusive as possible:

- applied to all major gear types (purse seine, longline, pole and line and troll);*
- initially established to include all main tuna target species (skipjack, yellowfin, bigeye and albacore tuna) during implementation;*
- include all landed catches, regardless of disposition (domestic or export), with the possible exception of artisanal catches that are not exported;*
- include all major product forms and processes (whole, headed and gutted, loins, steaks...chilled, frozen, canned, fishmeal) but offal (heads, eyes roes guts and tails) may be exempted; and,*
- once a CDS is established, it should have the capacity to be expanded to include swordfish, sharks and other priority species.*

16. The excerpts from 2014-2015 documentation include:

- vii) Excerpt from CDS-IWG Workshop report and group exercises on what the scope should be for a WCPFC CDS;
- viii) Excerpt from FFA paper: CDS-IWG-DP01 (2014) Catch/Trade Certification Requirements and scope for a WCPFC CDS; and
- ix) Excerpt from EU comments on the EU national CDS requirements and also in response to the FFA suggestion on priority and scope for the CDS.

Excerpt from CDS-IWG Workshop 2014:

14. It was emphasised that this recommendation related specifically to the design of the CDS and not how it would be implemented. Discussion on Recommendation 2 generally concurred that the scope should be broad and a system should be *designed* to include all species, methods and end uses (disposition), product types and bycatch. Participants noted however there was a need to consider a phased approach to *implementation*. Participants saw a need to discuss the design scope and the implementation scope at the next CDS-IWG.

15. With regard to CDS inclusivity, there was high support for inclusivity of gear, end uses and target tuna species (Figure 2). The workshop exercise identified that participants saw longline and bigeye as the priority areas to focus on, although there was strong support to include purse seine and skipjack. Inclusivity for bycatch was the lowest priority. Further details on the scope of a WCPFC CDS are discussed below.

16. In considering the inclusivity of gear, participants identified that longline and then purse seine were the highest priorities (Figure 3). The need to include pole and line and trolling was seen as a lower priority.

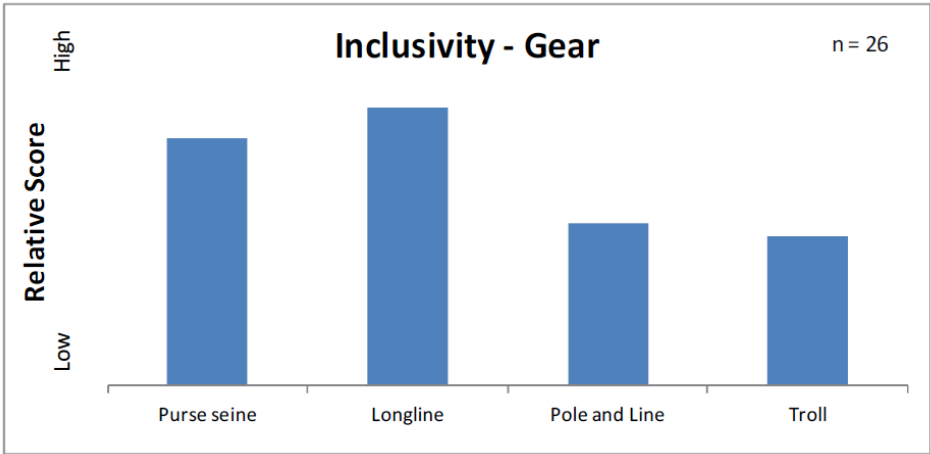


Figure 3: Workshop Exercise 1: Recommendation 2: Ranking of gear as elements for inclusion in a WCPFC CDS.

18. The gear priorities were reflected in the species priorities with bigeye ranked as the top priority, closely followed by skipjack and yellowfin (Figure 4). Albacore was seen as a lower priority.

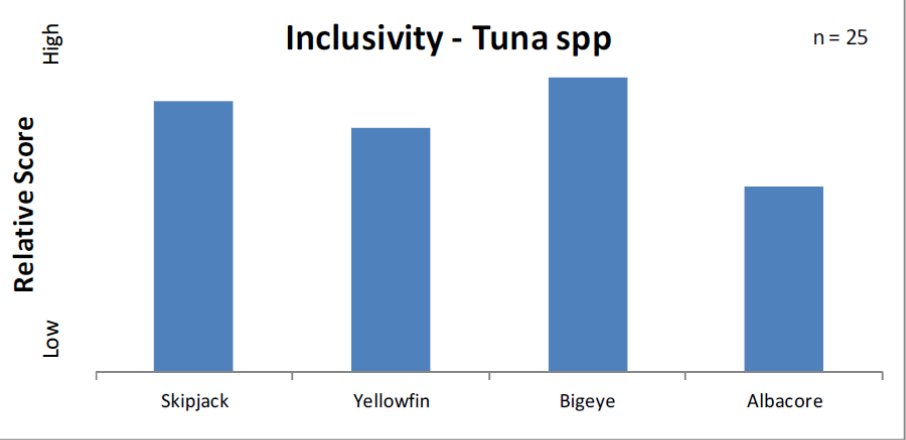


Figure 4: Workshop Exercise 1: Recommendation 2: Ranking of target tuna species as elements for inclusion in a WCPFC CDS

19. With regard to the disposition or end uses of the product, there was general consensus that artisanal catches that are not exported could be exempt from a CDS as long as they are not large-scale catches sold commercially. This is reflected in the results of the workshop exercise with the low ranking of artisanal (Figure 5). There was support for all other domestic and exported catch to be included in the CDS although participants saw exported catch as the highest priority.

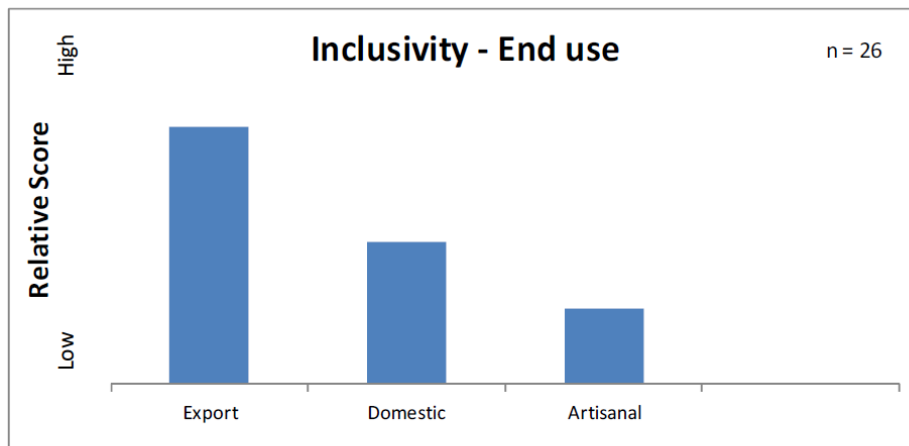


Figure 5: Workshop Exercise 1: Recommendation 2. Ranking of target tuna species as elements for inclusion in a WCPFC CDS.

20. In considering the inclusivity of product types and forms, participants ranked fresh and frozen product as the highest priorities (Figure 6). This is consistent with the priority for longline and bigeye. There was also good support for the inclusion of canned product in the CDS. There was similar support for the inclusion of most product forms in a CDS with the very clear exception of offal.

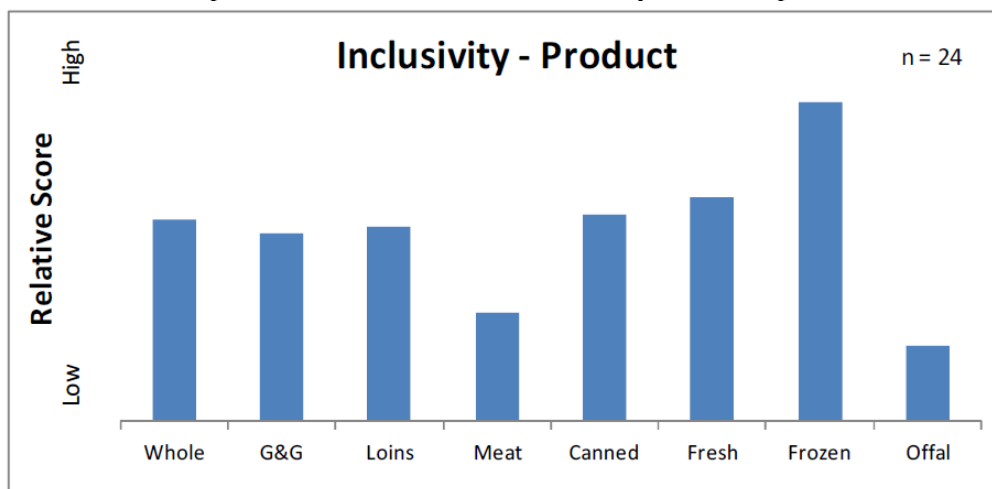


Figure 6: Workshop Exercise 1: Recommendation 2. Ranking of tuna product form and processing as elements for inclusion in a WCPFC CDS

21. Although the inclusion of bycatch in a CDS was the lowest priority (Figure 2), when participants ranked the bycatch species to include, swordfish was considered the top priority followed by bluefin tuna and sharks (Figure 7).

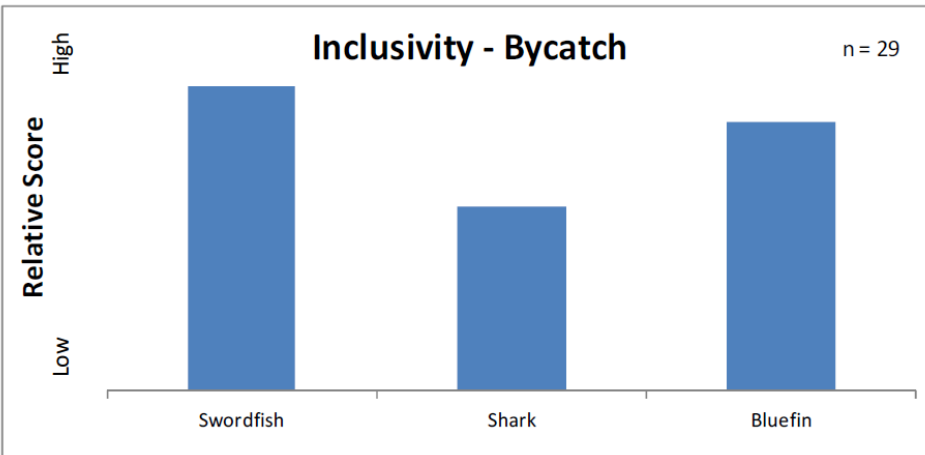


Figure 7: Workshop Exercise 1: Recommendation 2. Ranking of bycatch groups as elements for inclusion in a WCPFC CDS

Excerpt from FFA paper: CDS-IWG-DP01 (2014)

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).

Excerpt from EU comments to Circular 2015_16

First of all we would like to highlight two very important issues:

- The EU only accepts validation by flag State authorities and that such authorities are public authorities only. If the WCPFC decides otherwise, the EU would not be in any position to recognise the scheme under the EU IUU Regulation and it would merely become an additional document to the EU catch certificate upon exports to the EU.*
- In addition, in order for flag States to validate a catch document it is necessary that they have access from coastal States to all information pertaining to the fishing activities of the vessel in question.*

We have also some comments on the FFA paper which I believe should be also relevant to you:

- We support the idea that CDS should be linked to other existing MCS tools and that duplication and replication of existing data collection and validation mechanisms is unnecessary*
- We agree that the scope and application of the scheme should extend to all fishery products traded in the region and support the idea to trial the scheme focusing on major target tuna species in the region (BET, YFT, SKJ, ALB).*

Recommendation

- 17. CDS-IWG is invited to note the paper and to consider the comments that have been provided as a basis to further develop the key elements of a WCPFC CDS.**

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