



**2<sup>nd</sup> MEETING OF CATCH DOCUMENTATION SCHEME INTERSESSIONAL WORKING  
GROUP**

FSM-China Gymnasium, Palikir,  
Pohnpei, FEDERATED STATES OF MICRONESIA  
**21 – 22 September 2015**

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**FFA CDS TECHNICAL CONSULTATION**

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**WCPFC-2014-CDSIWG02-DP02  
2 September 2015**

**Paper by FFA Secretariat**

*This paper is submitted by the FFA Secretariat, and is without prejudice to the views and positions of FFA  
Members, individually or collectively.*

## Working Paper 2: FFA CDS Technical Consultation

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1. In May 2015 FFA members held a CDS Technical Consultation that looked at traceability requirements and developments globally, regionally and nationally. This included:

- An overview of WCPFC's efforts to progress CDS development, provided by the WCPFC Compliance Manager;
- Work by FAO consultants developing the CDS guiding principles and technical guidelines;
- FFA consultants work on Mass Balance Reconciliation, Unloading Authorisation Codes and port inspection risk assessment;
- PNG's implementation of e-CDS; and
- Potential design elements of a CDS.

2. The FFA Technical Consultation agreed that the objective of a CDS needed further consideration. Whilst the primary objective related to mitigating IUU fish from moving through the market chain, there was scope for the inclusion of secondary objectives that some individual members, or groups of members, may want to pursue. However inclusion of secondary objectives should not detract from the primary objective. The growing importance of social accountability standards was noted and it was suggested that this should be treated as equally important as the legality of the catch.

3. The FFA Technical Consultation agreed that scope should be as all-encompassing as possible (4 key tuna species and fisheries) but additional consideration is required on when and how to include artisanal fisheries, and on prioritisation, including where it would make the biggest difference to the management of the fishery, and recognition of the different realities that exist in different fisheries.

4. CDS systems in other RFMOs are generally low quantity and high value fisheries and that a WCPFC system will need automated processes to cope with a 2 million ton fishery. It was suggested that one size does not fit all and that a single, large top down system approach would not work. The system would need shared ownership to encourage usage by the industry, and mechanisms to include participation by non-CCM's.

5. Determining the IUU factor and understanding the nature of the non-compliance, notably misreporting and non-reporting required further examination to inform critical design elements of any system. System design and operational processes would also influence the development of standardised terminology and definitions.

6. The FFA technical consultation acknowledged that key to these developments will be creating policy and technical interoperability and cooperation to ensure that only legitimate WCPO product enters the commodity chain. It noted the existing high degree of cooperation within the FFA membership will be strengthened and widened with the Niue Treaty Subsidiary Agreement (NTSA) recently coming into force. The NTSA has very detailed and broad information sharing provisions that would assist with validation and certification of catch. It was agreed that there are

already multiple data collection tools in place that probably provide all of the information necessary to support CDS

7. The FFA Technical Consultation was mindful that a streamlined CDS requires cooperation from the market, processing and distribution States, and that WCPFC is the most appropriate forum to do this. A unilateral approach would run the highly probable scenario of unnecessary trade barriers and displacement of IUU product to flags, ports, and markets that are not covered. It was agreed that there are many stakeholders that should share responsibility to undertake specific tasks throughout the process.

8. The FFA Technical Consultation agreed that WCPFC Secretariat should have an overall integration and oversight role. This could include assessing the systems and performance of members against any agreed standards.

9. A key role for WCPFC would be to develop indicators to identify those parts of the commodity chain where vulnerabilities exist for the entry of IUU product. To do this WCPFC attention should be placed on monitoring the distribution and imports of WCPFC catch and associated trade volumes. This would assist to identify where in the commodity chain CDS standards are in most need and would serve as a performance indicator for implementation of a comprehensive CDS.

10. The FFA Technical Consultation recognised the need to specify the “documentary chain”, specifying what documentation must be produced, where, by whom etc. It also needs to indicate what type of data will be used to provide verification/validation at various points. The Chain needs to be specific on the role of each stakeholder at each point.

11. The FFA Technical Consultation agreed that the important thing for verification and validation is that the relevant authorities can provide assurance that they have access to, and will use, the existing data to play their role – as opposed to the WCPFC CDS going into fine detail about exactly how that authority will use that data.

12. It was agreed that as a general rule validation should be undertaken by a Government Authority (flag State, export State etc). Delegation should be a matter of national risk assessment and tools such as Mass Balance reconciliation and audits will detect if such arrangements do not meet standards.

13. The FFA Technical Consultation agreed that data sharing should be as transparent as possible to achieve the objective of the CDS. Noting that WCPFC already have data rules in place that finds a good balance between transparency and commercial confidentiality.

#### *Standards approach*

14. The FFA Technical consultation supported the development of a standards based approach for a WCPFC CDS, with emergent themes discussed including:

- The approach has potential and should be further developed for consideration at the next meeting of the WCPFC IWG-CDS.
- Caution is required not to allow WCPFC to undermine the processes that are already in place at the national levels.
- Defining the traceable items and its labelling will be critical, impacting on how unique ID numbers are assigned, and the mechanisms of certification and verification.
- Training of national authorities involved in traceability and certification will be required, standards around this may be required.

- The role and IT system requirements of WCPFC should be further developed, including a hypothetical database structure and data flows which enable a variety of data ingestion and integration mechanisms with members exiting systems.
- WCPFC should ensure that it complements what is already in place or is anticipated.
- Explore opportunities to utilise existing WCPFC systems such as Part I and Part II Reporting and the compliance monitoring scheme.

#### *Audit framework*

15. A concept paper was considered for a CDS audit framework. It was noted that there is a need for minimum standards creating a level playing field within and between industry and government. In terms of traceability an audit framework would increase transparency, provide assurances between trading and catching partners and demonstrate due diligence. The WCPFC Regional Observer Program (ROP) was used as an example where the WCPFC sets standards for national observer programmes and audits against these standards in order for these programmes to be a part of the ROP. It was suggested that a CDS based on harmonising existing systems was preferred and the WCPFC traceability role include mass balance reconciliation.

A series of possible standards were provided which included:

- Unique Identification of Traceable Products
- Data Capture
- Data Communication
- Product Certification and Data Management

#### **Future Work**

##### *Policy development*

16. The FFA Technical Consultation resulted in general agreement on several areas which could help to inform the development of:

- Key policies framing CDS objectives, system scope, development of standardised terminology and definitions, the development of standards, and an audit framework.
- The “documentary chain” to specify what documentation must be produced, where, by whom etc, and what type of data will be used to provide verification/validation at various points. The Chain needs to be specific on the role of each stakeholder at each point.
- Minimum standards that each step in the chain needs to meet, and identify what specific information needs to be passed up the chain with the fish.
- The audit/performance evaluation framework for assessing the implementation of the documentary chain against the standards.

##### *Systems development*

17. A review of existing data collection is required to determine if everything that is needed to complete each step in the documentary chain is already collected and shared. If no, identify what needs to be changed or added, and if yes, identify what needs to be changed to put these data together?

18. Work towards developing system design and testing to produce and share certificates, hold data and manage Mass Balance reconciliation is needed.