



Glenn Hurry  
Executive Director  
WCPFC Secretariat  
Kaselehlie Street P.O. Box 2356  
Pohnpei, FSM 96941

Dear Professor Hurry

At the Catch Documentation Scheme Intersessional Working Group (CDS-IWG) held in Pohnpei, Federated States of Micronesia on 1 October 2013, Members were asked to provide information to the Secretariat on their current programs and capacities (paragraph 12 of the CDS-IWG summary report). Information regarding Australia's programs is enclosed. The Secretariat also requested that Members advise of their key contact points for the CDS-IWG to ensure that appropriate persons receive pertinent information and advice.

Australia's implementation of the CCAMLR and CCSBT catch documentation schemes (CDS) and the IOTC statistical document scheme has been relatively smooth and, aside from budget constraints, if a WCPFC CDS is consistent with other CDS programs we do not anticipate there would be significant impediments to Australia implementing a WCPFC CDS. However, there are a range of issues the CDS-IWG should consider in this early phase. We hope input from Australia and other countries helps the CDS-IWG and Secretariat in their thinking about the design and scope of a WCPFC CDS. This letter and enclosure outlines Australia's experience implementing catch documentation schemes.

The key Australian contact points for the CDS-IWG are Kelly Buchanan and Jenny Baldwin. They can be reached on [wcpfc@daff.gov.au](mailto:wcpfc@daff.gov.au) or + 61 2 6272 3756.

Yours sincerely

Gordon Neil  
Assistant Secretary  
Fisheries Branch  
Sustainable Resource Management Division  
31 March 2014

Enc.

---

## **Australia's input under paragraph 12 of the WCPFC CDS-IWG Report**

Catch documentation schemes (CDS) are effective fisheries management tools, especially when coupled with other strong monitoring, control and surveillance measures. Australia participates in two CDS and the IOTC statistical document programme for bigeye tuna. They are components of Australia's obligations under the Commission for the Conservation of Antarctic Marine Living Resources (CCAMLR), the Commission for the Conservation of Southern Bluefin Tuna (CCSBT) and the Bigeye statistical document scheme, adopted by the Indian Ocean Tuna Commission (IOTC).

### **Schemes in the region in which Australia participates**

#### **CCAMLR**

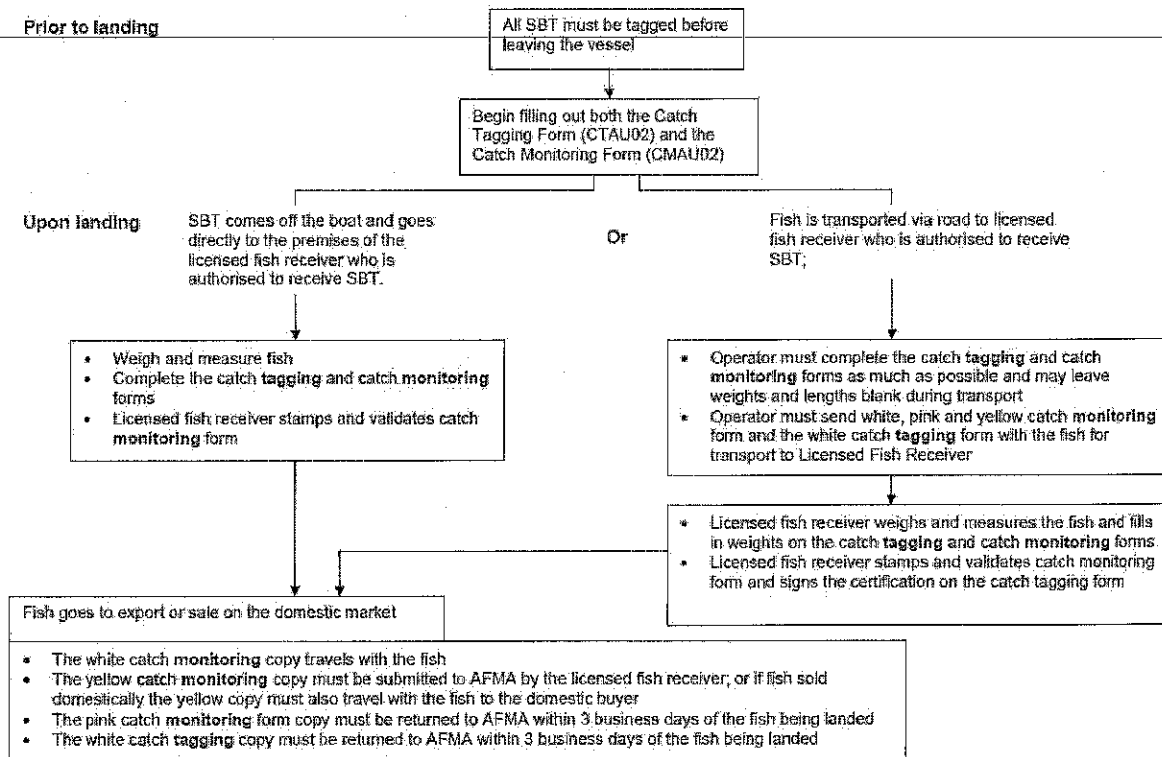
The CCAMLR CDS (CCAMLR Conservation Measure 10-05) was implemented in May 2000 and prohibits the landing of toothfish (*Dissostichus* spp.) without a catch document. The CDS also provides a mechanism for tracking landing, transshipment, export and re-export of toothfish. The CCAMLR CDS utilises a unique documentation number system and requires verification of catch information against the vessel's authorisation to fish, which also provides a verified data source for the Scientific Committee and the Commission. The CCAMLR CDS has specific requirements to allow the participation of non-contracting parties.

The information provided by CDS can be verified by other sources such as VMS data. Since 2009, the CCAMLR CDS has utilised an electronic web-based interface for the completion of CDS documents. The CCAMLR CDS program is fully implemented in Commonwealth fisheries that catch toothfish, noting there are currently only five vessels operating in these fisheries.

The CCAMLR CDS is currently undergoing a review. The outcomes of this review will assist the development of a robust system for the WCPFC.

#### **CCSBT**

The CCSBT CDS was introduced on 1 January 2010 and replaced the former Trade Information Scheme. The CCSBT CDS applies to all southern bluefin tuna (SBT) sold domestically, imported, transhipped, exported or re-exported. Each SBT must be tagged, weighed and measured. No SBT can be accepted for trade without being tagged and accompanied by completed CDS documentation. The scheme utilises a unique document number, on which both exporters and importers submit data to the CCSBT Secretariat in order to identify any discrepancies. For longline operations there is up to three CCSBT CDS forms to complete; for the farming sector there are up to five CDS forms that must be completed (including catch monitoring, farm transfer, farm stocking, export/re-export, catch tagging forms). The diagram below outlines the CDS process when SBT is caught by longline on the East coast of Australia.



CCSBT is considering the implementation of an electronic CDS, however at present the CDS is solely paper-based.

The costs are higher for the CCSBT CDS scheme than for CCAMLR. Factors that may have increased the costs could include, but are not limited to:

- the number of operators;
- the number of individual export activities;
- the number of documents required to be completed, checked and processed;
- the use of tags;
- level of auditing;
- requirements to cross check documents; and
- reporting frequency and requirements.

### IOTC

There are two Resolutions adopted by the IOTC with relevance to the development of a CDS: Resolution 01/06 *Concerning the IOTC Bigeye Tuna Statistical Document Program* and Resolution 10/10 *Concerning Market Related Measures*. However, Resolution 01/06 is the key resolution.

The IOTC adopted Resolution 01/06 in 2001. Australia implemented this programme together with two other Atlantic tuna RFMOs statistical document programs, with one statistical document program to meet all the requirements of three RFMO programs. The Australian Fish Export Statistical Document Program covers the international requirement for the export of swordfish, bigeye tuna and northern bluefin tuna from Australia. It is primarily used by Commonwealth fishing vessels authorised to fish in both the IOTC Area of Competence and the WCPFC Area of Competence.

As a statistical document scheme, rather than a CDS, not all bigeye caught in the Convention Area is included in the program. The IOTC program only applies to the import or re-export of bigeye tuna from IOTC members. Nonetheless the IOTC program collects useful fisheries

management information and assists the Commission's efforts to eliminate illegal, unreported and unregulated fishing.

The IOTC's statistical documentation scheme for bigeye tuna requires that bigeye being imported into contracting parties be accompanied by a statistical document. There are requirements for exporting countries to verify information, but this process is not as rigorous as a CDS program would be. There is no requirement for bigeye caught using purse seine or pole-and-line vessels that is destined for the canneries in the Convention Area to be accompanied by the statistical document (paragraph 1). The scheme is paper-based rather than electronic. The IOTC has considered proposals for a key species catch documentation scheme but agreement has not been reached.

Although the Australian Fish Export Statistical Document Program is used by many operators, the cost is lower than that of the CCSBT CDS as the process is much simpler, with minimal reporting and administration. The Australian Fish Export Statistical Document Program also does not include an auditing activity.

### **European Union Regulations**

In addition to the schemes described above, European Commission Regulation 1005/2008 has operated in the region since 1 January 2010. Fisheries products exported to the European Union must comply with the Regulation's catch documentation requirements directly, or through a recognised CDS. Australia meets these requirements via a paper-based system.

### **National issues**

Australia suggests that it would be sensible to await the review of the CCAMLR CDS operations and learn from these experiences in the implementation of an e-CDS for WCPFC. This review is expected to provide recommendation by the end of 2014. CCSBT agreed in 2013 to postpone talks of a revamp/review of its CDS until the ICCAT e-CDS had been implemented and the review of CCAMLR's CDS to learn from others exposure to these systems. Any new system should be promoting harmonisation of schemes between RFMOs (particularly the Tuna RFMOs) consistent with the recommendations from the Kobe process.

Australia supports a CDS that covers domestic landings and comprehensively deals with transshipment and includes objectives that encompass: catch monitoring; scientific information; traceability and preventing the products of illegal, unreported and unregulated fishing from entering markets.

Australia's experience with implementation CDS varies depending on the roles and responsibility associated with the scheme. The required resources are dependent on the complexity of the scheme, the number of associated documents, the use of tagging, the requirement for tracking domestic landing, the frequency of reporting and the level of auditing and cross checking of the documents. As mentioned there are also factors that affect the cost of the program. The ease of implementing a CDS will also depend on the domestic legislation and government system in place, particularly in regard to tracking domestic consumption. Australia would recommend that the CDS be flexible and harmonised with existing CDS programs to ensure ease of implementation.

### **WCPFC CDS design issues**

Australia supports the general idea of developing a scheme which is appropriately adapted for use in the WCPFC tuna fisheries and meets the needs of all CCMs. In Australia's view, the CDS-IWG should consider the entirety of guiding principles outlined in the CDS-IWG terms of

reference in designing the WCPFC scheme. In addition, the CDS-IWG should identify and address design issues related to:

- *catch monitoring, verification and validation*, noting Australia's view that any verification system should be flexible, to take account of different States' management and compliance systems and levels of catch.
- *providing scientific and management information*, noting Australia's view that the CDS program should support effective fisheries management in the WCPFC and should not overly burden industry. The design phase should therefore consider the scientific benefit of information collected under the scheme
- *traceability*, taking account of *both* effort and catch-based management systems in place in individual States and noting that if the product is split between domestic and international markets as it passes through the supply chain, documentation must be able to reflect this split. Documentation should be maintained when the product is processed in third party non-member States
- *preventing illegal, unreported and unregulated WCPFC fishery products from entering trade*, taking into account States' individual risk-based management systems and noting extant monitoring, control and surveillance measures including port state measures in the WCPFC area.

The roles and responsibilities of flag States, port States, market States, charter States and the Secretariat must also be determined during this early planning phase. A decision about which species and fishing methods the CDS program would apply to would need to consider the feasibility of applying to the WCPFC purse seine fishery, as catches in that sector are very large. If the program were to apply to the purse seine sector, documentation could be completed on a shot by shot basis. If it were to apply to the longline sector it could take a similar form to the CCSBT CDS, with documentation accompanying individual fish.

The scheme should align with existing monitoring, control and surveillance and should consider how it can harmonise with existing schemes, including logbook and template formats where possible, in order to maximise compliance and reduce the regulatory burden on industry. Noting the Australian Fish Export Statistical Document Program currently applies to Commonwealth fishing vessels authorised to fish in both the WCPFC area wishing to export of Swordfish, Bigeye tuna and Northern Bluefin Tuna from Australia. Australia considers that an electronic CDS would be more beneficial and less burdensome than a paper-based system.

In whatever way the scheme is designed, the establishment of a WCPFC CDS will require significant upfront investment from CCMs and capacity building costs, and Australia would seek a full understanding of the costs involved in implementing such a system before supporting it. Australia also urges the need to ensure CDS is consistent with other WCPFC CMMs, in particular the consideration for any special requirements of Small Island Developing States and Territories.