

## Seafood Traceability:

Aligning RFMO catch documentation schemes  
to combat IUU fishing

December 2021



# Seafood traceability: Aligning RFMO catch documentation schemes to combat IUU fishing

Dr Antonia Leroy

Head of Ocean Policy, WWF European Policy Office

December 2021

**EU IUU FISHING COALITION**



OCEANA

The Nature Conservancy





# Contents

- The importance of multilateral CDS & challenges
- Assessing CDS worldwide: ICCAT, CCAMLR and CCSBT
- Threats to robust CDS
- Opportunities to align CDS for the benefit of all
- Proposed minimum standards for a global and harmonised CDS
- Next steps

© Darko Mihalic / WWF Mediterranean / FishMPABlue



## Why are CDS in RFMOs important?

- Tracing fisheries products is essential to guarantee their legality through all stages of the value chain - from capture, landing, first sale and through trade among various professional intermediaries
- RFMOs play a central role as fora for cooperation between countries, including in terms of traceability

## Challenges

- Multiplication of standards and requirements adding burden and capacity needs for developing States and importing countries and operators
- Lack of interoperability and harmonisation between systems





## Question

What are the strengths of the existing CDS in CCAMLR, ICCAT and CCSBT?

# Strengths of current RFMO CDS

## CCAMLR

Fully digital system, served by a well-designed database with real-time verifications

Training for using the software is easier and faster as the number of operations is limited since toothfish fishing is practised by a relatively small fleet of industrial fishing vessels

Covers all species from the toothfish genus (other RFMO CDS cover only one species)

E-CDS can be accessed by any authorised authority to cross-check data (it improves the ability to detect a consignment of illegally-caught toothfish)

## CCSBT

ALL CDS documents have a unique number, helping to deter forgery

Every legally-caught southern Bluefin tuna (SBT) has a unit tag attached

Covers targeted fishing as well as accidental catches

## ICCAT

Fully digital system, served by functional web-based interface that could be easily upgraded

Covers targeted and accidental catches

Unlicensed fishers who occasionally catch Bluefin tuna (BFT) must register on the ICCAT system and report their catches in order to sell BFT on the market

CDS is supplemented by an obligation to physically mark tuna using tags issued by State authorities (to make a link between the electronic declaration and the traceability of the product along the full value chain, from various stakeholders to the final consumer)

# Weaknesses of current RFMO CDS

## CCAMLR

Reporting of live weight and fishing methods are not required

## CCSBT

Paper-based system, serving only as a database for archiving and reporting purposes

Database is not designed to issue any catch documents

Database does not allow for real-time cross-checking of CDS documents (inspector cannot query the database to verify the authenticity of a paper-based CCSBT form)

## ICCAT

Procedure and use of software are too complex and cumbersome for SSF and occasional fishers (especially for accidental bycatch)

Requested operations (e.g. radio catch declaration at sea, designated port being far from the fishing vessels area) are process-heavy

Risk that the reinforcement of the reporting constrains imposed on professionals and their dematerialised verification (electronic validation) can lead to a reduction in controls and physical inspections

# Threats to robust CDS

- ❑ The limited scope of geographic coverage
- ❑ Additional administrative burden
- ❑ Lack of capacity and expertise
- ❑ Too many different rules





# Opportunities to align CDS for the benefit of all

- ❑ Consistency between unilateral and multilateral CDS
- ❑ Key data elements (KDEs) harmonisation
- ❑ Improved information sharing and data cross-checking
- ❑ Reduced business costs and facilitating trade





**Table 4 | CDS key data element requirements**

Recommended or applied in practice    Optional or needs to be improved    Not recommended or required

	Key Data Elements (KDEs)	Stakeholder recommendations for CDS			Current RFMO multilateral CDS practices				Current unilateral CDS practices		Current regional CDS practices
		EU IUU fishing Coalition	FAO Voluntary Guidelines	GDST 1.0 Standard	ICCAT	CCSBT	CCAMLR	IOTC <sup>1</sup>	European Union	United States of America	Association of Southeast Asian Nations
<b>WHO</b>	Vessel name		See article 1(b)								
	UVI (IMO number)		See article 1(b)								Only required for carrier vessels, not for fishing vessels
	Vessel flag		See article 1(b)								
	International Radio Call Sign (IRCS)		See article 1(b)								
	Information of exporter/re-exporter		See article 1(f)								
	Identity of import company		See article 1(g)								
<b>WHAT</b>	Product type (use of FAO Alpha code)		See article 1(d)								
	Species name embedded in the FAO/ASFIS 3-Alpha Code		See article 1(b)								
	Estimated live weight (kg)			Not specified between live or processed							
	Processed weight (kg)		See article 1(d)								
	Declaration and authorisation of transshipment at sea		See article 1(c)								
<b>WHEN</b>	Event date (Harvesting operation)		See article 1(b) <sup>2</sup>								
<b>WHERE</b>	Catch area		See article 1(b)								
	Authorisation to fish		See article 1(e) <sup>2</sup>								
	Port of landing		See article 1(b)								
	Processing location										
<b>HOW</b>	Fishing methods										

# The ongoing development of CDS

---

Association of Southeast Asian Nations (ASEAN)



ASEAN CDS and electronic tenant eACDS for all fish species



Requires only 7 KDEs for fishing vessels and 6 for carrier vessels

Western and Central Pacific Fisheries Commission (WCPFC)



Creation of a stand-alone CDS started in 2014 for bigeye tuna



At the time of writing this report, operational systems were still not working

**Table 5 | Technical proposals for a global CDS model**

**Binding**

**Recommended / Optional**

**Not required**

In addition to the assessed KDEs and the identified examples of best practice, these further criteria would strengthen the proposed global CDS model.

Key Data Elements to be included	Industrial mono-specific fisheries	Industrial multi-specific fisheries	Artisanal / small-scale fisheries (SSF)	Bycatch fisheries (including discards)
CDS format	Electronic <sup>1</sup> with formal notification of validation (CDS certificate number for verification)	Electronic with formal notification of validation (CDS certificate number for verification)	Electronic (depending on State and stakeholders capacities, a paper with formal notification of validation (CDS certificate number for verification) as a transition period to electronic means could be considered	Electronic (depending on State and stakeholders capacities, a paper with formal notification of validation (CDS certificate number for verification) as a transition period to electronic means could be considered
Vessel name	<ul style="list-style-type: none"> <li>Global Record of Fishing Vessels</li> <li>RFMOs fishing register</li> </ul>	Idem	Idem	<ul style="list-style-type: none"> <li>Global Record of Fishing Vessels</li> <li>RFMO fishing register or individual registration for CDS establishment (made by vessel or representatives and validated by flag State)</li> </ul>
Unique vessel identifier	IMO number	Idem	IMO number or if not applicable RFMO number or national registration number	IMO number or if not applicable RFMO number or national registration number
Vessel flag	State name	State name or code included in RFMO number	State identification code included in RFMO number	State name (ABNJ) or identification code included in RFMO number
International Radio Call Sign (IRCS) and other tools <sup>6</sup>	IRCS	IRCS	IRCS or National requirements call sign	IRCS or <b>National requirements call sign</b>
Information (identity) of buyer / exporter <sup>iii</sup> / re-exporter	Name, address, telephone, legal identification number, point of buying / export / re-export and transport details	Idem	Idem	Idem
Identity of Importing / re-selling company	Name, address, telephone, legal identification number, point of import/resale and transport details	Idem	Idem	Idem
Product type	<ul style="list-style-type: none"> <li>FAO Code<sup>7</sup></li> <li>Prioritise information on fresh, whole and unprocessed product<sup>8</sup></li> </ul>	<ul style="list-style-type: none"> <li>Idem</li> <li>Idem</li> </ul>	<ul style="list-style-type: none"> <li>Idem</li> <li>Idem</li> </ul>	<ul style="list-style-type: none"> <li>Idem</li> <li>Idem</li> </ul>

# The way forward

- ❑ RFMOs to expand CDS coverage to additional species and geographical areas while ensuring alignment
- ❑ Set up an electronic system allowing digital data entry, as well as data consultation and controls for verification and certification (e.g. QR code or link to an online verification page, linked to the database), and which facilitates electronic data exchange with external databases
- ❑ At minimum, integrate the requirements of the 17 KDEs laid out by the EU IUU fishing Coalition into e-CDS including, in particular, the systematic information of the live weight (rounded weight) and the net weight (processed weight), both for live (ranching) and dead fish
- ❑ Create systems that are interoperable
- ❑ Begin to develop a generically-aligned model of CDS for all tuna and tuna-like species common to all tuna-RFMOs
- ❑ Begin to develop a generically-aligned model of CDS for non-tuna species common to all non-tuna RFMOs



# Thank you!

Dr Antonia Leroy, Head of Ocean Policy, WWF EPO

[aleroy@wwf.eu](mailto:aleroy@wwf.eu)

## Seafood Traceability:

Aligning RFMO catch documentation schemes  
to combat IUU fishing

December 2021



**EU IUU FISHING COALITION**



OCEANA

The Nature Conservancy

