



Import Control Schemes: The Responsibility of Market States, Need for Harmonization and Benefits for Industry

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Presentation Content

- IUU and the importance of import controls
- Existing unilateral and multilateral systems
- Key Data Elements – minimum standards and existing discrepancies between schemes
- The need for harmonisation and benefits for industry
- Statement of support



IUU and the Importance of Import Controls

- Illegal, unreported and unregulated (IUU) fishing is a fundamental issue that is preventing governments and RFMOs from achieving sustainable fisheries.
- New approaches to address IUU fishing, accompanying flag state control, include port and market state measures.
- The weaker the governance of port and market states, the more likely it is for illegal fish and fishery products to enter¹.
- Over the past 10 years, port and market states have been:
 - ✓ Ratifying and implementing the Port State Measures Agreement (FAO, 2009)
 - ✓ Implementing trade-related measures to control imports
- **Robust import controls stop illegally-sourced seafood entering the market.**

¹Hosch and Blaha (2017)

Existing Unilateral and Multilateral Systems

- *Unilateral:*

EU Catch Documentation Scheme

- Also known as the **Catch Certification Scheme** (the Catch Certificate is an integral part of the system)
- Covers **all marine wild caught fish** (with some minor exemptions)
- Catch certificate **must be validated by the flag State** certifying that the products are in compliance with national and intl. fishing laws and CMMs
- EU Member States use a **risk-based approach** to scrutinize certain certificates
- CATCH is the new voluntary database for catch certificates, enabling **real-time monitoring and data exchange**

US Seafood Import Monitoring Programme

- Covers **13 types of seafood** identified as the most vulnerable to IUU fishing
- Importers must hold an **International Fisheries Trade Permit**
- The importer must upload catch and landing documentation to the International Trade Data System and keep records regarding the **chain of custody** of the fish from harvest to point of entry into the US
- The National Marine Fisheries Service carries out **random and target audits** on IFTP holders
- **Responsibility lies with the importer not the flag State**

Existing Unilateral and Multilateral Systems

- *Multilateral:*

CCAMLR CDS

- Covers Patagonian Toothfish

ICCAT e-BCD

- Covers Atlantic Bluefin Tuna

CCSBT CDS

- Covers Southern Bluefin Tuna

IOTC Statistical Documents

- Covers Bigeye Tuna

Key Data Elements



- Key Data Elements (KDEs) are defined as critical data that are required to successfully determine product legality and to trace a seafood product through all relevant stages of the supply chain².
- KDEs usually focus on information relating to the **'who'**, **'what'**, **'when'**, **'where'** and **'how'**.

²The Oceans and Fisheries Partnership (2017)

Key Data Elements: Minimum Standards

The 17 KDEs that we deem important as a minimum basis for a robust import control scheme include:

- vessel flag
- IMO number
- catch area
- fishing authorisations
- trans-shipment declarations
- unloading ports
- catching method

<http://www.iuuwatch.eu/wp-content/uploads/2020/01/CDS-Study-WEB.pdf>

A comparative study of key data elements in import control schemes aimed at tackling illegal, unreported and unregulated fishing in the top three seafood markets:

the European Union, the United States and Japan

January 2020



OCEANA



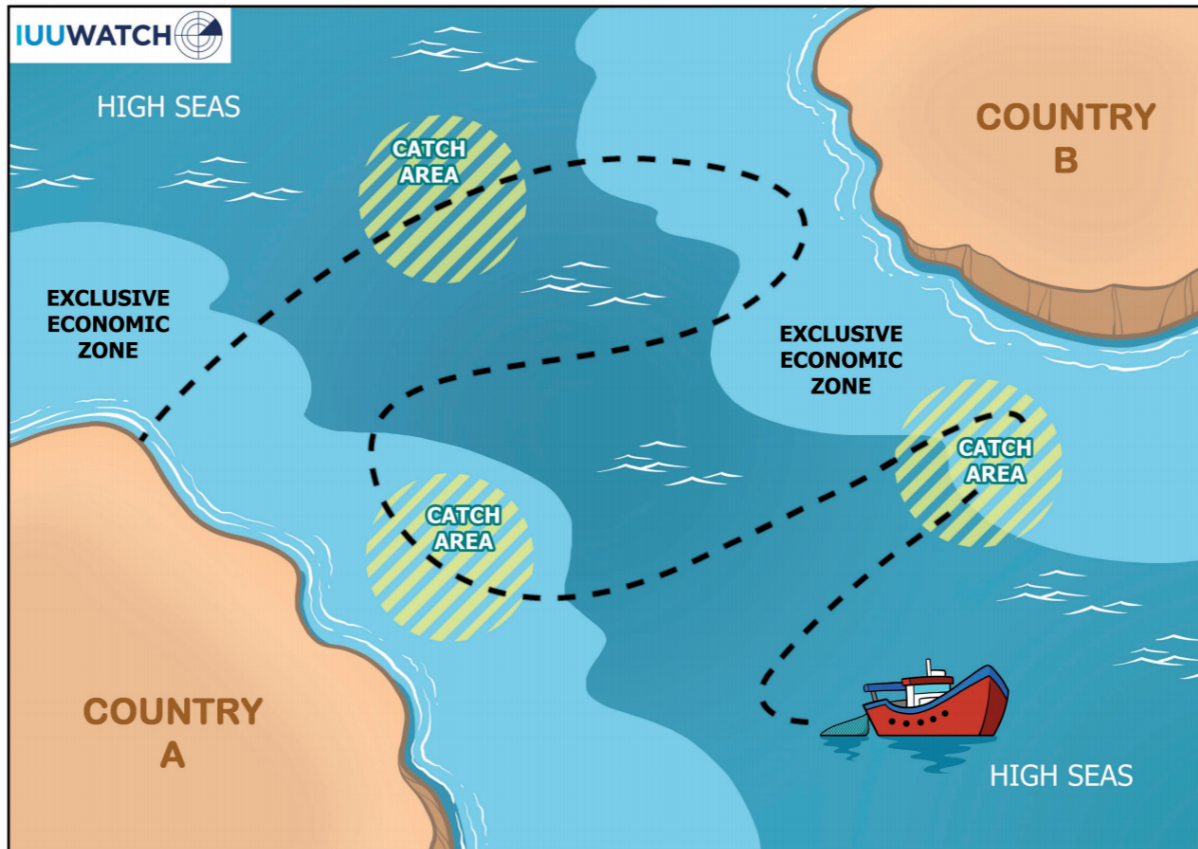
Key Data Elements: Minimum Standards

	Best practice
	Optional or needs to be strengthened/improved
	Not required

	Key data element (KDE)	European Union	United States	RFMO & CCAMLR Catch Documentation Schemes				Additional Information
				ICCAT	CCSBT	CCAMLR	IOTC* (Statistical Document)	
WHERE	Catch area (better defined with a clear distinction between the EEZ and the high seas)							CCSBT, ICCAT and IOTC: require the name of their own catch areas, which does not always distinguish between the EEZ and the high seas.
	Authorisation to fish							US: required if available.
	Port of landing							
	Processing location							
HOW	Fishing gear type or catching method							

SCOPE AND OPERATIONAL BEST PRACTICES	Species covered by the import scheme	All catches of marine fishery products, with the exception of aquaculture obtained from fry or larvae, ornamental fish, mussels, snails and other products of minor importance (full list at https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32010R0086)	Abalone, Atlantic cod, blue crab (Atlantic), dolphinfish (mahi mahi), grouper, king crab (red), Pacific cod, red snapper, sea cucumber, sharks, shrimp, swordfish, tunas (albacore, bigeye, skipjack, yellowfin, and bluefin)	Atlantic Bluefin Tuna	Southern Bluefin Tuna	Toothfish (Dissostichus)	Bigeye Tuna	
	Import data captured in digital format							EU: has developed an IT system for CDS (CATCH) which is currently being trialed.
	Authorities or stakeholders responsible for verification	Coastal and flag States	Importers and NOAA to verify importers' activities	Flag and market States	Flag and market States	Flag and market States	Flag and market States	
	Risk assessment to target at-risk imports			NA	NA	NA	NA	
	Data exchange between market States			NA	NA	NA	NA	

Key Data Elements: Minimum Standards

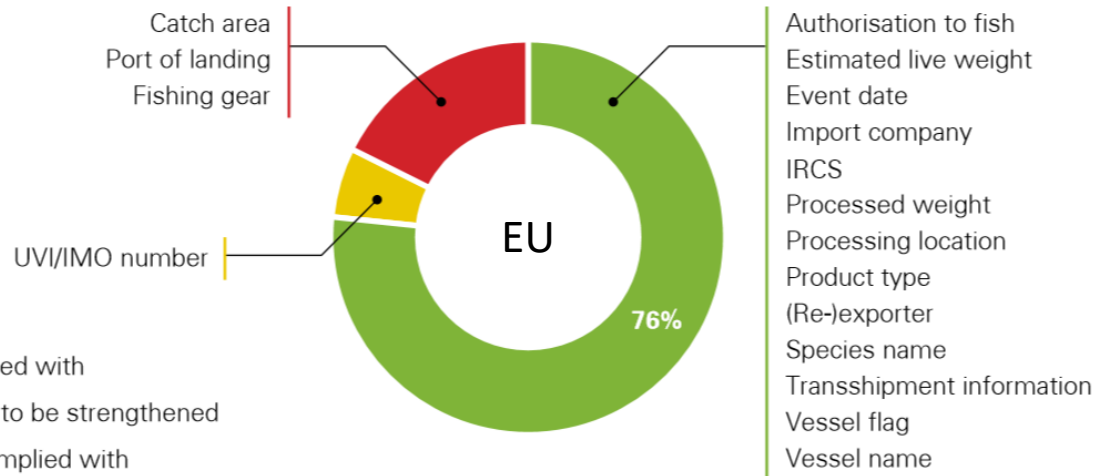


For example, the EU CDS is missing:

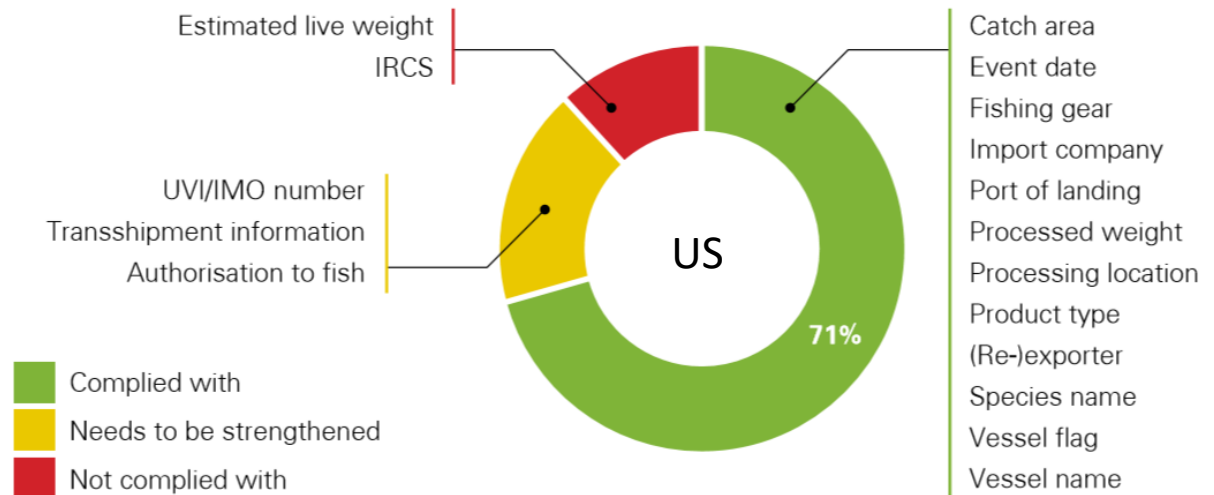
- Specific catch area details
- Fishing gear type or catching method
- Port of landing
- Mandatory IMO number (or UVI if IMO number not applicable)

Key Data Elements: Discrepancies Between Schemes

- Our research also shows that existing unilateral and multilateral import control schemes are not fully aligned.



- For example, against our KDE recommendations, the EU and US are only **59 %** aligned (10 out of 17 KDEs in common)



The Need for Harmonization

- In the coming years, we expect more market States to adopt their own import control rules.
- The NGO community believe that the adoption of import control schemes to improve traceability is **key** for identifying and stopping IUU-caught seafood from entering markets.
- However, a **lack of standardisation and harmonisation** among systems can lead to a situation where import controls are poorly understood and design flaws may pass undetected and repeated in new systems.
- For fishers and supply chain actors that currently or may in the future seek to sell or process catch for multiple markets, the **cost of complying** with different systems could be considerable.
- Global alignment of KDEs between major markets is an effective way of ensuring a global seafood **level-playing field** and **trade facilitation**.

Statement of Support

- Following this webinar, we welcome industry participants to sign onto a statement **supporting consistency in seafood import control schemes.**

Extracts from statement:

*We call on all market States, trade blocs and Regional Fisheries Management Organisations that currently have in place import control schemes or are contemplating the introduction of a scheme, to consider working together to **align the data** requested following best practices...*

This is not a demand for a single global scheme, but rather a recommendation for a minimum level of consistency among the different systems...

This would better enable industry to use digital tools to rapidly and accurately comply with catch and import control documentation requirements...



THANK YOU

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