

Original: English

REPORT ON THE IMPLEMENTATION OF THE DEROGATION TO VALIDATE BCDS FOR TRADES OF BFT BETWEEN EU MEMBER STATES IN 2019 (PARAGRAPH 5B OF ICCAT RECOMMENDATION 18-12)

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Regional Fisheries Management Organisations

1. Introduction

As other ICCAT CPCs, the European Union (EU) has implemented the eBCD system since 26 May 2016 for the Bluefin tuna (BFT) caught by the purse seine vessels and traps, and since 1 July 2016 for the fish caught by other gears. All operators fully implement the system as from January 2017.

Paragraph 5b Recommendation [18-12] provides a derogation to validate BCDs for trades of BFT between EU Member States. This derogation is up for review in 2020, and in the meantime, the EU is required to provide the Commission with a report on its implementation.

2. Derogation under paragraph 5b of ICCAT Recommendation [18-12]

The data presented hereunder corresponds to the period 1st January 2019 to 31st December 2019 and has been extracted through the functionality in the eBCD system.

The scope of this report has been restricted to the trade events for BFT from seller EU Member States, in order to avoid duplication, and because the selling Member State is responsible for the possible validation of the trade in eBCD.

In 2019, the EU Member States recorded 102,711 trade events in the eBCD system involving 29,956.08 t. Even if para 5a of the Recommendation [18-12] does not require their record, 78% of the trades recorded in the eBCD by EU concerned internal trades inside EU Member States territories (80,080 trades). The remaining trades include 7,345 exports to other CPCs (7%), and 15,116 trades between EU Member States (15%).

The quantities involved amounted to 7,698.80 t (26%) for internal trades, and 20,433.25 t (68%) for exports. Trades between EU Member States amounted to 1,824.03 t, which only represents 6% of the total weight traded (**Figure 1**).

41% (42,467) of the total trades were validated, and 56% (57,197) were exempted of validation, for a quantity of 24,539.07 t (82%) and 5,351.51 t (18%) respectively (**Figure 2**). The exemption was related to both the derogation under paragraph 5b of Recommendation [18-12] and exemption for tagged fish according to para 13c of Recommendation [18-13].

Regarding the trade events exempted of validation, 7,658 concerned trades between EU Member States (derogation para 5b) (21%), and 22,170 involved tagged fish (74%) for a quantity of 455.35 t (21%) and 1,762.69 t (79%) respectively (**Figures 4**). The remaining exempted events are related to internal trades (**Figure 3**). Tagged fish concerned both trades between EU Member States and internal trades.

The average quantity by trade was 59.5 kg for trades exempted of validation because the derogation 5b, and 79.5 kg for trades of tagged fish (**Figure 5**).

3. Use of the alternative in para 5d of Recommendation 18-12

The European Union no longer use the alternative given to CPCs in para 5d of Recommendation 18-12 to indicate an approximate weight estimated by sampling. For tagged fish, the actual weight of every specimen is recorded and linked to a tag number in the eBCD.

4. Verifications

In terms of verifications of the information in the eBCD, as part of the standard procedure for validation, the control authorities perform verifications and crosschecks of all relevant documents including logbook data, landing declarations, sales notes, ICCAT authorizations, etc. Consistent with the EU legislation, the control authorities perform physical verifications and inspections at landing, in the market inside and at the entry in EU Member States based on risk assessment, and all catches are officially weighed at landing. At the point of exit and entry from and into EU, verifications include crosschecks of eBCDs with airbills and sales notes, as well as physical verifications. Imports into the European Union follow customs procedures.

Even when validation is not required, the control authorities perform crosschecks with catch declarations and the eBCDs information in conjunction with other Member States concerned, which enables efficient monitoring of operations exempted from validation. In addition, the control authorities verify the validation of catch or tags details, and analyse the coherence of the timing of the validation messages as well as the possible alert messages in eBCD.

Data extraction functionalities, crosschecks and verifications through the eBCD system itself enable EU Member states to establish improved risk assessment procedures to specifically target trades events for crosscheck and verification.

In 2019, 147 trades were rejected due to inconsistencies.

5. Conclusion

The number of trades concerned by the derogation in para 5b of Recommendation [18-12] is significant but involves small quantities of Bluefin tuna as it generally involves fillet (FL) and other (OT) presentations. Additionally, 78% of the trades recorded by EU are internal trades within EU Member States contributing to the traceability of the fish through the chain.

The derogation under para 5b of Recommendation [18-12] removes a significant administrative burden related to validation, and contributes towards achieving a more level playing field between the EU and the other ICCAT CPCs, and is also consistent with the principle of free market inside of the EU. It is important to note that at this stage no information is available in relation to a possible negative impact of these measures on the traceability of BFT products. Instead, the reported cases under the Tarentelo investigation point towards the eBCD system being circumvented for illegal products offered for sale by using the same eBCD for several consignments and is not linked to the absence of validation.

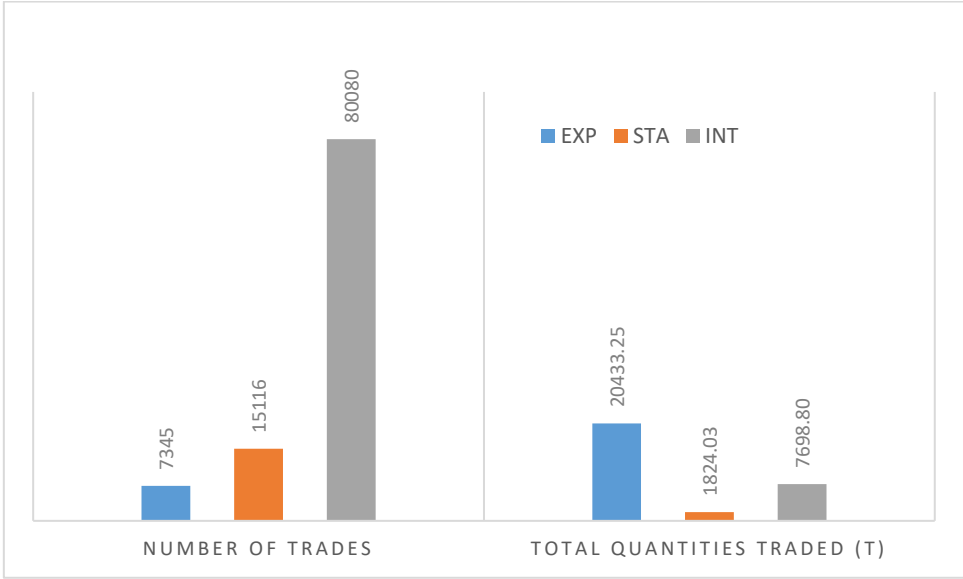


Figure 1. Number and quantities (t) of trades from EU Member states.

EXP (exports from EU to other CPCs), STA (trades between EU Member States), INT (internal trades inside Member States territories)

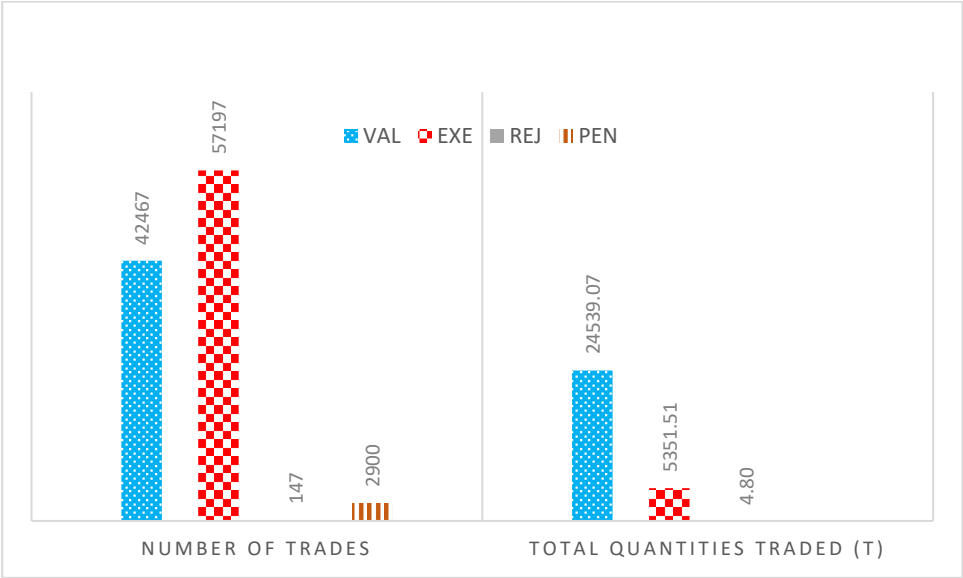


Figure 2. Trades validated (VAL), exempted (EXE), rejected (REJ) and pending (PEN).

EXE (trades exempted of validation), VAL (trades validated), REJ (trades rejected), PEN (trades pending of validation)

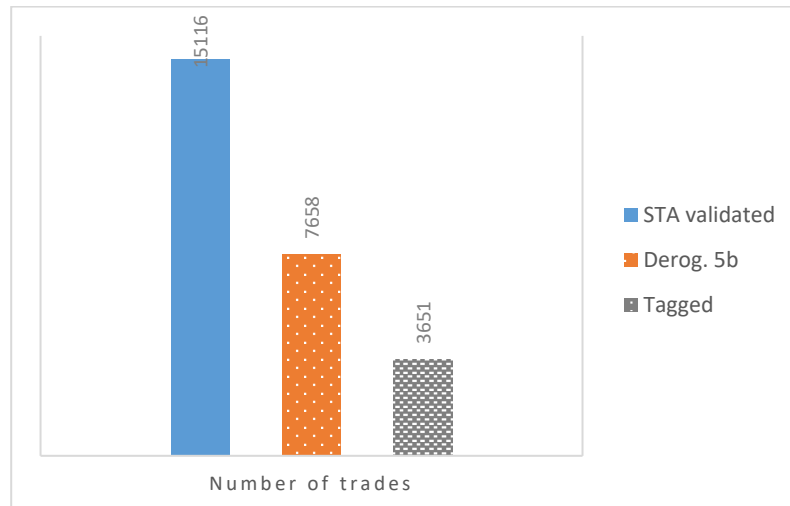


Figure 3. Comparison between the number of trades between EU Member States validated and those subject to derogation.

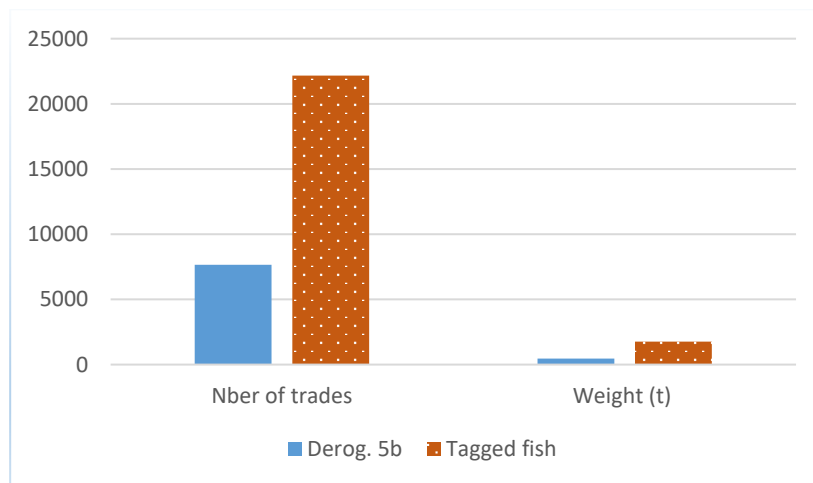


Figure 4. Proportion of trades exempted of validation due to derogation in para 5b or tagged fish.

Note: trades exempted of validation due to derogation 5b do not include trades with tagged fish. Trades with tagged fish concern both trades between EU Member States and internal trades inside an EU Member State.

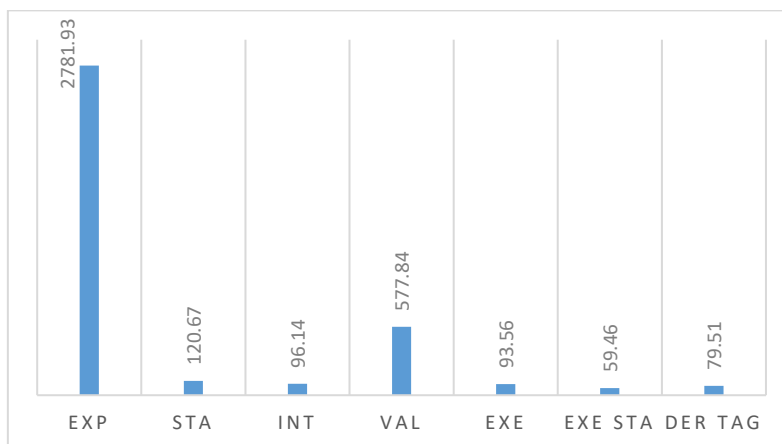


Figure 5. Average quantity (kg).