

Original: English

**DISCUSSION PAPER ON BFT PROCESSING VESSEL (REVISED)**  
**(PROPOSAL TO AMEND REC.18-13 TO RECORD BFT PROCESSING ACTIVITY)**

*(Submitted by Japan)*

## 1. Background and outline

Most of farmed BFT are harvested to processing vessels that lie alongside farming cages. BFT are processed to fillet and/or loin, and frozen on processing vessels. Then the processed BFT are directed to marketing states via that processing vessels or containers. Processing activities are monitored by Regional Observers who are dispatched to monitor harvesting operations.

Notwithstanding processing of BFT is a common practice, the current eBCD does not include processing information. In most cases, the last section of eBCD, i.e., Trade Information, records “Fresh” and “Round” weight even though BFT are actually frozen and fillet/loin.

This inconsistency of product description between eBCD and actual consignment cause difficulties for importing CPCs to examine whether the consignment is accompanied by appropriate eBCDs. This is concerning because the amount recorded in eBCD (round weight) is larger than the actual weight of consignment, thus there is a risk that illegal BFT are smuggled into the consignment.

When BFT is imported to Japan, Japan requests importers to provide information on processing (e.g., name of the processing vessel, product type and weight after processing), and check consistency between the processed weight and eBCD using conversion factor established by the SCRS (i.e.,  $RWT=1.67 \times FIL$ ). Where necessary, Japan requests the importer to provide processing logbook of the processing vessel.

While processed BFT being imported to Japan is subject to rigorous monitoring, it is not certain whether BFT destined to other markets are also subject to the same level of import monitoring. Japan believes that consistent approach to monitor processing activities is beneficial.

For the reasons above, Japan proposes to insert “8. PROCESSING INFORMATION” next to “7. HARVESTING INFORMATION” in eBCD (see section 2 below) in order to ensure transparency of processing activities and close a loophole, if any, associated with processing. While Processing Information does not require validation, exporting CPCs (i.e. farming CPCs) shall validate ‘Trade Information’ after reviewing information related to processing. It is also worthwhile to consider developing eBCD function that denies implausible processing (e.g. transformation from Fillet to GG, excess product weight that cannot be explained by the conversion factor).

## 2. Amendment to Rec.18-13

- A. The following column should be inserted between ‘7. Harvest Information’ and ‘8. Trade Information’ in Annex 2:

8. PROCESSING INFORMATION										
PROCESSING VESSEL DESCRIPTION										
NAME	FLAG			ICCAT RECORD						
PRODUCT DESCRIPTION (indicate net weight n kg. for each type of product)										
F	RD		GG		DR		FL		OT	TOTALWEIGHT
FR	RD		GG		DR		FL		OT	TOTALWEIGHT

B. The following new section should be added before “8. TRADE INFORMATION” in Annex 3;

“8. PROCESSING INFORMATION

(1) Completion

(a) General principles:

This section is only applicable to dead farmed tunas.

The domestic seller or exporter or their authorized representative or an authorized representative of the CPC of the seller/exporter shall be responsible for completion.

The PROCESSING INFORMATION section shall be completed at the end of the processing operation.

(b) Specific instructions:

“NAME”: list the name of the processing vessel.

“FLAG”: indicate the flag CPC.

“ICCAT Record No”: indicate the ICCAT number of the processing vessel.

“PRODUCT DESCRIPTION”: indicate net weight in kg. for each type of processed product)

(2) Validation

Validation of this section is not required.”

C. First sentence in “8. TRADE INFORMATION (2) Validation” should be amended as follows:

“The CPC of the seller/exporter shall be responsible for validation of the TRADE INFORMATION section, after reviewing the PROCESSING INFORMATION, as appropriate, unless bluefin tuna are tagged in accordance with Paragraph 20 of the Recommendation. ”

### 3. Work Plan

- IMM (TBD):

- Discuss administrative and control requirements

- eBCD TWG (2nd TWG after IMM)

- Discuss technical feasibility to

i) add “processing information” in the eBCD system; and

ii) develop a function that automatically rejects implausible processing, and consider respective time/cost estimate.

- 2023 Commission meeting

- Review the results of intersessional work and amend Rec.18-13.

In order to reflect the work plan, Japan proposes to add new paragraph to Rec. 21-08:

“194bis. The Commission shall consider reflecting “Processing on board” in the eBCD at its 2023 annual meeting. To this end, IMM WG and then eBCD TWG shall discuss the technical, administrative and control requirements and report the results to the Commission.”