

みなみまぐろ保存委員会

CCSBT-CC/2410/08 (Rev 1)

Operation of CCSBT MCS Measures

1. INTRODUCTION

This document provides a summary of the operation of some of CCSBT's main Monitoring, Control and Surveillance (MCS) measures, which have either not been discussed in other papers, or for which additional supplementary information is available. It also includes a note concerning use (nil) of CCSBT's "Guideline on principles for action and steps to be taken in relation to extraordinary circumstances" (Compliance Policy Guideline 5 – CPG5).

The measures and guideline discussed here are:

- The Catch Documentation Scheme (CDS),
- The Transhipment Monitoring Program,
- Guideline on principles for action and steps to be taken in relation to extraordinary circumstances (CPG5),
- Records of Authorised Vessels and Farms,
- The Vessel Monitoring System (VMS),
- CCSBT IUU Vessel List, and
- Minimum Standards for Inspections in Port.

2. CATCH DOCUMENTATION SCHEME (CDS)

CDS compliance issues have already been summarised in the Secretariat's Compliance with Measures report¹, and are generally not discussed in further detail here. This section of the report only includes information on Non-Cooperating Non-Members (NCNMs) that are voluntarily cooperating with the CDS.

Cooperation with NCNMs: USA

The USA is not a Member of the CCSBT but continues to cooperate voluntarily with the CDS with submissions being received quarterly. The Secretariat received its first import submission from the USA in late April 2016 (for the 2015 year). As summarised in 2023², the USA's voluntary cooperation with the CDS is becoming more important as there are an increasing number of export Catch Monitoring Forms (CMFs) and Re-export/ Export after Landing Forms (REEFs) exported to the USA³.

¹ Paper CCSBT-CC/2410/04

² Paper CCSBT-CC/2310/08 (Rev.1) and CCSBT-CC/2310/14

³ Exports to the United States recorded on CMFs and REEFs increased from 796.87 (t) in the 2022 calendar years, to 932.32 (t) in the 2023 calendar year, and are back at the same level as they were in 2021.

3. TRANSHIPMENT MONITORING PROGRAM

The CCSBT has a transhipment monitoring program for monitoring the at-sea and in-port transhipment of SBT by its Members. The program requires the CCSBT Secretariat to maintain an up-to-date Record of Authorised Carrier Vessels (CVs), as well as manage the supporting documentation such as deployment requests, transhipment declarations and observer reports.

Operational Issues

Unobserved Transhipments (2023): None Reported

No unobserved at-sea transhipments were reported⁴ by Members during 2023. Indonesia submitted four transhipment declarations for transhipments undertaken during 2023 that were not signed by an observer. However, a deployment request related to these transhipments was received and these transhipments were accounted for in the observer daily reports received by the Secretariat, so it appears they were observed.

Indonesia not Fully Meeting CCSBT's Transhipment Resolution Obligations

Indonesia has been transhipping SBT at sea under an IOTC-agreed pilot project for monitoring transhipments at sea undertaken within IOTC's area of competency⁵ and non-compliant at-sea transhipments of SBT occurred between 1 January 2023 and 31 October 2023.

None of Indonesia's at-sea transhipments involving SBT conducted prior to 1 November 2023 met the requirements of the CCSBT's Transhipment Resolution⁶ for several reasons, including:

• No deployment requests, transhipment declarations, 5-day reports, observer reports or other required notification have, to date, been provided to the CCSBT (or IOTC) for these transhipments.

From 1 November 2023, a trial at-sea programme commenced for SBT transhipments to specified wooden Indonesian-flagged carrier vessels carrying national observers commenced. Further discussion on Indonesia's compliance with the Transhipment Resolution obligations and the data and information provided under this trial programme to date are included in papers CCSBT-CC/2410/06 and CCSBT-CC/2410/13, so have not been repeated here.

General Issues

In cases where transhipment observers were successfully deployed, the Secretariat notes the same main issues with operation of the Transhipment Resolution as in previous years which are difficulties regarding:

- identifying SBT during multi-species transhipments, and
- ascertaining the species of tuna (specifically SBT) based solely on transhipment observer photographs. While it is essential to have observer photographs on record, it appears almost impossible to identify the species of tuna with any certainty (especially when frozen, gilled and gutted) based on photographs alone.

⁴ Based on national reports received at the time of finalizing this paper, which included national reports from AU, EU, ID, JP, KR, NZ and TW.

⁵ Refer to paragraphs 25 and 26 of <u>IOTC's Resolution 23/05 on Establishing a Programme for Transhipment by</u>
Large-Scale Fishing Vessels

⁶ The previous version of the Transhipment Resolution – revised in Oct 2017 - was in force during this period

To address these operational issues, the Secretariat continues to recommend that:

- SBT should be transhipped separately from other tuna and tuna-like species, in order to assist observers with identification, and
- Members and the Secretariat should monitor developments in the effectiveness and availability of practical on-site genetic testing kits (for tuna species identification) so that any such tools developed can be considered for use by transhipment observers in the future.

Authorised Carrier Vessels: IMO Number Requirement

Between 1 July 2023 and 30 June 2024 the Secretariat received authorisation notifications from Members that related to 39 carrier vessels. The vessel flags of the carrier vessels for which authorisations were notified during this period are shown in the table below:

CV Flag	Indonesia	Japan	Korea	Panama	Singapore	Taiwan
Total Vessels	17	4	3	9	1	5

IMO numbers have been provided for all CCSBT-authorised Carrier Vessels between 1 July 2023 and 30 June 2024.

Summary of Transhipment Data Received

A summary of transhipment declarations and/or observer reports/CDS forms received for Japan, Korea and Taiwan for 2023, and the first half of 2024 (aggregated by flag and product type) is provided at Attachment A (Tables 1 - 5). Attachment A does not include information from the 204 transhipment declarations received from Indonesia (as part of the trial) which involved 243.3t of SBT.

Tables 1, 2 and 3 of Attachment A provide information from at-sea transhipment declarations and observer reports received. In Table 1 of Attachment A, there sometimes appear to be significant discrepancies between transhipment declaration weights of SBT versus observer reported weights. The reason for these discrepancies is because many observer reports have often not included the weight of SBT transhipped for each individual vessel, but only the overall weight of all SBT over a series of transhipments. Tables 4 and 5 provide the same information for in-port transhipment/ CDS information received.

The following points summarise only the transhipment information received by the Secretariat for Japan, Korea and Taiwan for 2023 and the first half of 2024 and do not consider the at-sea transhipment declarations received from Indonesia:

- All of the at-sea transhipments were observed during 2023;
- Observer deployment requests specifying that SBT were to be transhipped were received for all reported SBT transhipments at sea during 2023;
- There were no reported SBT transhipments at sea during the first half of 2024;
- The Secretariat received 46 transhipment declarations for transhipments at sea totalling 1,121.2t during 2023;
- The Secretariat received 10 transhipment declarations for in-port transhipments during 2023 totalling 784.8t and no transhipment declarations for in-port transhipments that occurred during the first half of 2024. It is not yet possible to check whether any in-port transhipments occurred for this period, because CMFs for

- the 2nd quarter of 2024 are not due to be submitted to the Secretariat until 30 September 2024;
- Observer reports have been received for 100% of all reported 2023 at-sea transhipments; and
- Table 3 of Attachment A provides a summary of transhipment weights recorded on transhipment declarations, observer reports, and CDS information for the 2023 calendar year. To enable valid comparisons to be made, this table presents data for only those transhipments for which the Secretariat has received both transhipment declarations and observer reports and has been able to match these transhipments with CDS documents. When summed, the weights of transhipped SBT reported on transhipment declarations versus CDS documents differed from each other by 0.8%.

4. GUIDELINE ON PRINCIPLES FOR ACTION AND STEPS TO BE TAKEN IN RELATION TO EXTRAORDINARY CIRCUMSTANCES (CPG5)

The Secretariat confirms that it has not received any CPG5 notifications from any Member since CCSBT 29 in October 2023. Further discussion on CPG5 is included in paper CCSBT-CC/2410/11.

5. RECORDS OF AUTHORISED VESSELS AND FARMS

Consolidated List of Authorised Vessels (CLAV)

As noted last year, maintenance of the CLAV had not occurred since funding for this ceased in October 2019. The Tuna Compliance Network (TCN) discussed the CLAV at its in-person meeting during late June 2023, where ICCAT and the IOTC expressed interest in exploring options to reinvigorate the CLAV. The IMCS Network, in its support of the TCN, is in the advanced stages of development of a Combined Regional Vessel Authorisation Query Tool. This tool is planned to be launched around early in October 2024, and, upon initial launch, this will contain vessel authorisation data from CCSBT, along with Inter-American Tropical Tuna Commission (IATTC), the Indian Ocean Tuna Commission (IOTC), the Western and Central Pacific Fisheries Commission (WCPFC), the North Pacific Fisheries Commission (NPFC) and the Pacific Island's Forum Fisheries Agency (FFA).

Vessel authorisation data from other RFMOs is planned to be added to the tool as this becomes more technically feasible. The plan is to prioritise integrating ICCAT vessel authorisation data, as the only TCN Member whose data is not currently available through the tool. The IMCS Network is discussing with the Commission for the Conservation of Antarctic Marine Living Resources (CCAMLR) and the South Pacific Regional Fisheries Management Organisation (SPRFMO) with regards to refining or developing their Application Programming Interface (API) to support the integration of their authorised vessel data. The CCSBT vessel authorisation data is being made available through an API, so the ongoing requirements on the Secretariat to support this development are minimal.

Authorised Farm and Vessel Records

The Secretariat continues to receive authorised farm and vessel updates approximately twice a week, with vessel updates containing up to eight hundred vessels. Upon receipt of this information, the Secretariat updates its authorised vessels/farms database as well as the CCSBT website.

Authorised Fishing Vessels: IMO Number Requirement

Paragraph 3 of the CCSBT's 'Resolution on a CCSBT Record of Vessels Authorised to Fish for Southern Bluefin Tuna', includes the following IMO numbering requirements:

- 3. Members and Cooperating Non-members shall ensure that the following categories of fishing vessels in the CCSBT Record of Authorised Vessels have IMO numbers issued to them:
 - all fishing vessels (except wooden and fibreglass vessels) flying their flag that are authorised to catch SBT, and that are at least 100 gross tonnage in size, and
 - effective from 1 January 2021, wooden and fiberglass fishing vessels flying their flag that are authorised to catch SBT, and that are at least 100 gross tonnage in size, and
 - effective from 1 January 2022, all motorised inboard fishing vessels of less than 100 gross tonnage down to a size limit of 12 metres in length overall (LOA) authorised to operate outside waters under the national jurisdiction of the flag State.

There is almost 100% compliance with the requirement for IMO numbers for vessels 100 gross tonne and over (sub-points one and two of Paragraph 3 of CCSBT's Authorised Vessel Resolution). For fishing vessels authorised between 1 July 2023 to 30 June 2024 that are recorded as being 100 tonnes in weight or more, the Secretariat notes that:

- IMO numbers were submitted to the Secretariat where required for the fleets of all distant water fishing Members (EU, Japan, Korea and Taiwan);
- IMO numbers were submitted for all relevant Australian and Indonesian fishing vessels;
- An IMO number has not been provided for one (1) South African fishing vessel⁷; and
- There were previously eleven (11) New Zealand fishing vessels which were CCSBT authorised up to August 2024, and which did not have an IMO number⁸. All eleven vessels were not authorised to operate beyond national jurisdiction. Following outreach from the Secretariat, New Zealand identified that three vessels had an incorrect tonnage listed and were in fact under 100GT, while the remaining eight vessels had not caught SBT in last five (5) years and New Zealand chose to end their CCSBT authorisation. So, at the time of completing this paper, all New Zealand flagged vessels on the CCSBT record comply with the IMO number requirements.

Effective from 1 January 2024, Members have also been required to include whether vessels are authorised to operate outside waters of national jurisdiction in the information provided in their list of authorised fishing vessels. All Members have complied with this requirement and supplied this information for all fishing vessels authorised between 1 January 2024 and 21 August 2024.

The provision of this information has also enabled the Secretariat to monitor IMO numbers for vessels less than 100 gross tonne but over 12 metres LOA that are authorised to operate outside waters of national jurisdiction and that have been authorised since the start of 2024. For these fishing vessels authorised between 1 January 2024 and 21 August 2024, the Secretariat notes that:

⁷ The vessel in question is the POSEIDON, which has a listed tonnage of 139.15t.

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⁸ Due to its observation that unexpected SBT bycatch events appeared to be coming more common in its waters, in early 2022 New Zealand decided to CCSBT-authorise virtually its entire fleet in order to try and avoid future occurrences of vessels which are not CCSBT-authorised by-catching SBT.

- New Zealand has authorised two (2) vessels that fall into this category and both vessels have IMO numbers; and
- Indonesia has authorised 156 vessels that fall into this category of which four (4) vessels do not have an IMO number.

Information on Freezing Capacity

Freezing capacity information has been provided for all fishing vessels for which vessel authorisation notifications have been received between 1 July 2023 to 21 August 2024.

6. VESSEL MONITORING SYSTEM (VMS)

Two Members reported some VMS failures⁹ during their most recently completed fishing season, but no Members reported any VMS non-compliance.

In their National Reports to CC19/EC31:

• Korea reported that two of its vessels had temporary VMS failures during the 2023/24 fishing season, noting failures occurred between:

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July 19, at 21:01 (S40-40 E000-19) - July 20, at 01:34 (S40-28 E000-18) July 20, at 22:34 (S40-28 E000-16) - July 21, at 02:04 (S40-13 E000-16) July 22, at 23:03 (S40-20 E000-07) - July 23, at 03:31 (S40-06 E000-08) July 23, at 20:03 (S32-26 E77-35) - July 24, at 07:03 (S33-11 E79-19) July 24, at 10:03 (S33-24 E79-49) - July 25, at 06:12 (S34-47 E83-18) July 25, at 22:59 (S33-55 E86-26) - July 27, at 03:59 (S37-21 E92-12) Aug 31, at 00:00 (S385-45 E106-27) -Aug 31, 06:43 (S38-51 E107-13)
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Korea noted that in all cases vessel operators submitted data generated from their secondary units and that this data was later entered into Korea's system manually. Korea also noted that "new VMS units with enhanced security and batteries are being distributed to all vessels and that, as of September 2024, 4 out of 9 SBT fishing vessels" have been equipped with the new batteries.

New Zealand reported that during the 2022/23 fishing season, the Ministry for
Primary Industries issued five direction notices for SBT vessels which had reported a
VMS unit failure. Three of these notices involved vessels which were fishing for SBT
at the time of the direction and all failures occurred within New Zealand's exclusive
economic zone.

7. CCSBT IUU VESSEL LIST

In October 2019, CCSBT's IUU Vessel List was revised to include a provision to cross-list vessels from the IUU Lists of eight other organisations onto the CCSBT's IUU Vessel List, but only in cases where the RFMO concerned was the original IUU listing organisation.

The eight organisations the CCSBT agreed to cross-list vessels from are the Inter-American Tropical Tuna Commission (IATTC), the International Commission for the Conservation of Atlantic Tunas (ICCAT), the Indian Ocean Tuna Commission (IOTC), the Western and

⁹ Based on national reports received at the time of finalizing this paper, which included national reports from AU, EU, ID, JP, KR, NZ and TW

Central Pacific Fisheries Commission (WCPFC), the Commission for the Conservation of Antarctic Marine Living Resources (CCAMLR), the South East Atlantic Fisheries Organisation (SEAFO), the Southern Indian Ocean Fisheries Agreement (SIOFA) and the South Pacific Regional Fisheries Management Organisation (SPRFMO).

In late 2019 and early 2020, the Secretariat collated an initial CCSBT IUU List consisting of all appropriate cross-listed vessels from the eight nominated organisations above. This initial CCSBT IUU List included 116 cross-listed vessels and was first posted on the CCSBT's website in February 2020. In August 2024, CCSBT's IUU List included 157 cross-listed vessels, and no vessels independently IUU-listed by the CCSBT.

8. MINIMUM STANDARDS FOR INSPECTIONS IN PORT

The Resolution for a CCSBT Scheme for Minimum Standards for Inspection in Port was adopted in 2015 and came into effect from 1 January 2017 and includes a number of obligations for Port State Members.

Designated Points of Contact and Ports

The Resolution requires that each Member wishing to grant port access to 'foreign fishing vessels' (including carrier vessels other than container vessels) carrying SBT or fish products originating from SBT submits to the CCSBT Secretariat:

- A designated point of contact for receiving inspection reports, and
- A list of designated ports to which 'foreign fishing vessels' may request entry.

This information has been provided by all Members.

Port Inspection Reports

Paragraph 15 of the Resolution requires that:

15. Each year Members shall inspect at least 5 % of landing and transshipment operations in their designated ports as are made by foreign fishing vessels.

Further, paragraph 20 specifies that:

20. The port Member shall transmit a copy of the inspection report to the CCSBT Secretariat no later than 14 days following the date of completion of the inspection. If the inspection report cannot be transmitted within 14 days, the port Member should notify the CCSBT Secretariat within the 14 day time period the reasons for the delay and when the report will be submitted.

Table 1 outlines the Secretariat's interpretation of the number of inspections that need to be conducted to meet the 'at least 5%' port inspection requirement.

Table 1: Number of Required Inspections (to meet the 'at least 5%' inspection requirement)

Number of landing/ transhipment operations	Number of inspections required by Members to meet the requirements of paragraph 15, "at least 5% of landing and
occurring in designated ports	transhipment operations in their designated ports as are
	made by foreign fishing vessels"
1 – 20	1 ¹⁰
21 – 40	2
41 – 60	3
61 – 80	4
81 – 100	5

¹⁰ Inspecting no (0) landing and transhipment operations out of 1-20 operations, would mean that 0% were inspected and the minimum threshold of 'at least 5%' would not be met

For the 2023 calendar year, Japan, South Africa and Taiwan reported, or provided inspection reports for, foreign fishing vessels/ carrier vessels with SBT/SBT products on board conducting landing/transhipment operations in their designated ports¹¹. All three of these Members reported carrying out inspections and submitted port inspection documents to the Secretariat. South Africa also submitted twenty-two (22) inspection reports for vessels which did not have any record of SBT being on board. Those reports have been excluded from this analysis/Table 2 below.

Table 2 provides a summary of the port inspection reports that were provided (or not), how many reports were submitted within the required 14-day period, whether appropriate notifications were received for any reports that were submitted late and/or have not yet been submitted, and whether the inspection requirement of 'at least 5%' was met.

Table 2: Summary of 2023 Port Inspection Reports Required/Submitted (NA is 'Not Applicable')

Member	Total No. of Landing/ Transhipment Operations by 'Foreign Fishing Vessels'12 (carrying SBT/SBT products)	Number of Inspection Reports Received for 'Foreign Fishing Vessels' (carrying SBT/SBT products)	Percentage of Inspection Reports Received within the Required 14-Day Timeframe	Number of Notifications Received that Inspection Reports would be Submitted Late	Was the 'at least 5%' inspection requirement met? ¹³
Japan	3	1	100%	NA	Yes
South Africa ¹⁴	Not yet available	4	25% ¹⁵	0	Not yet available
Taiwan	1	1	100%	NA	Yes

In summary:

- Japan and Taiwan met and exceeded the 'at least 5%' port inspection requirement in 2023 and complied with the 14-day timeframe for submitting port inspection reports to the Secretariat.
- It is not yet known whether South Africa met/exceeded the 'at least 5%' port inspection requirement in 2023 because at the time of finalising this paper, South Africa's annual report to CC/EC had not yet been received.
- South Africa did not comply with the 14-day timeframe for submitting port inspection reports. As in previous years, South Africa provided most of its 2023 port inspection reports late and did not provide any notifications regarding the reason(s) for the delay(s) and when to expect the delayed reports as is required by the Resolution. It is also possible that some relevant port inspection reports have not yet been submitted to the Secretariat. The Secretariat will confirm this with South Africa.
- New Zealand also noted in their national report that: "Nine vessels authorised for CCSBT were inspected by NZ Fishery Officers during the 2022/23 Fishing Year. During port inspection, New Zealand Fishery Officers

¹¹ Based on national reports received at the time of completing this paper, which included national reports from AU, EU, ID, JP, KR, NZ and TW.

¹² As provided in Members' annual reports to the CC/EC

¹³ Based on the port inspection data received by the Secretariat

¹⁴ The Secretariat has not yet received South Africa's annual report to CC19/EC31 therefore it is unknown how many total landing/transhipment operations by foreign vessels carrying SBT/SBT products occurred in South African ports during the 2023 calendar year. This means that the percentage that were inspected cannot be calculated yet.

¹⁵ One further inspection report was received from South Africa within 14 days of the completion date listed on the inspection report, however the inspection completion date was more than six months after the inspection commencement date (and after the vessel arrived in port), so this inspection was not considered to have been received within 14 days of the inspection.

detected issues relating to seabird mitigation measures. All issues were referred to the flag state for further investigation."

The details of these inspections were not required to be submitted to the Secretariat as the vessels involved were not authorised to land or tranship SBT in port in New Zealand.

9. SUMMARY

It is recommended that CC19 notes the:

- USA's important voluntary cooperation with respect to providing quarterly CDS submissions to the Secretariat;
- Transhipment summary information provided at **Attachment A**;
- VMS failure issues noted by Korea and New Zealand;
- The update on Compliance Policy Guideline 5 (CPG5) notifications;
- The current status of the CCSBT's IUU Vessel List and the IUU cross-listing process; and
- Port inspection information submitted to the Secretariat.

CC19 is invited to consider the areas of compliance concern described in this paper and make any appropriate recommendations regarding these which include:

• South Africa's continued late submission of port inspection reports without the required notification of delay or the reasons for the delays being provided within the required 14-day time period (refer to paragraph 20 of the 'Resolution for a CCSBT Scheme for Minimum Standards for Inspection in Port'). South Africa has only provided one relevant port inspection report within the required 14-day timeframe since the Resolution came into effect in 2017.

Prepared by the Secretariat

Table 1: Summary of Transhipments <u>at sea</u> during the 2023 Calendar Year¹⁶ (transhipment observer on board)

	From Tra	nshipment Declar	From Observer Reports		
Fishing Vessel Flag	Number of Transhipments	Total Net Weight (kg) of SBT	Product Type	Number of Transhipments	Total Net Weight (kg) of SBT
Japan	10	665,460	GG	10	575,764
Taiwan	36	455,779	GG	36	017
TOTAL	46	1,121,239		46	575,764

Table 2: Summary of Transhipments <u>at sea</u> during the first half of the 2024 Calendar Year (transhipment observer on board and transhipment declarations already received)

	From Tra	inshipment Declara	From Obse	rver Reports	
Fishing Vessel Flag	Number Total Net Weight of Transhipments (kg) of SBT		Product Type	Number Total Net Weig of Transhipments (kg) of SBT	
Indonesia	197	358906	GGO/GGT	200	355800

TOTAL

Table 3: Summary of Transhipments <u>at sea</u> versus CDS Forms versus Observer Reports for the 2023 Calendar Year^{10,18}

	Comment	Number of	Total Net Weight	Total Net	Total Net
Fishing		Transhipments	(kg) from	Weight (kg)	Weight (kg)
Vessel Flag			Transhipment	from CDS	from Observer
			Declaration		Report
Japan	Observer provided SBT weights	8	551,579	551,496	575,764
Japan	Observer provided no SBT weights	2	113,881	113,881	0
Taiwan	Observer provided no SBT weights	36	455,779	464,802	0
TOTAL		46	1,121,239	1,130,179	575,764

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¹⁶ Excluding at-sea transhipments conducted by Indonesia for which documentation has only been received for transhipments occurring from on 1 November 2023 and which are detailed in paper CCSBT–CC/2410/13.

¹⁷ The Secretariat has received the observer reports but the observer did not provide an estimate of weight transhipped for the Taiwan transhipments.

¹⁸ This report is limited to transhipments where observer reports have been provided, and where the Secretariat has been able to match CDS information

Attachment A

Table 4: Summary of Transhipments that occurred in port during the 2023 Calendar Year¹⁹

	From Transhipment Declarations			From CDS		
Fishing	Number	Total Net	Product	Number	Total Net	Product Type
Vessel	of	Weight (kg)	Type	of	Weight	
Flag	Transhipments	of SBT		Transhipments	(kg) of SBT	
Korea	7	780,082	GG	7	780,082	GGT
Taiwan	1	2,645	GG	1	2,645	GGT
Taiwan	2	2,028	GGT	2	2,028	GGT
TOTAL	10	784,755		10	784,755	

Table 5: Summary of Transhipments that occurred in port during the first half of the 2024 Calendar Year¹⁹

	From Transhipment Declarations			From CDS		
Fishing	Number	Total Net	Product	Number	Total Net	Product Type
Vessel	of	Weight (kg)	Type	of	Weight	
Flag	Transhipments	of SBT		Transhipments	(kg) of SBT	
	No in port transhipments during the first half of the 2024 Calendar Year					
TOTAL						

observer deployment requests nor observer reports are required to be submitted for these transhipments. Only Transhipment Declarations are required to be submitted.