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March 2017

WWF Comments  
on

FAO's Draft Voluntary Guidelines for Catch Documentation Schemes  
(Draft Following the Resumed Technical Consultation Session of 14 July 2016)

Preamble

WWF has been working for over two decades on the development of global mechanisms for preventing and deterring illegal, unregulated and unreported (IUU) fishing.

The recent adoption by world leaders of the UN 2030 Agenda for Sustainable Development - which includes a specific Sustainable Development Goal on oceans (SDG 14) and an explicit target to end overfishing, IUU fishing and destructive fishing practices - places heavy emphasis on the need to establish ambitious, and meaningful global tools to combat IUU fishing in the immediate term.

Effective implementation of well-designed CDS is a powerful tool for driving fisheries management best practices and eliminating IUU fishing in supply chains – by improving data collection and transparency, and ensuring traceability from point-of-catch to final point of sale. As an action directly contributing to SDG 14, the FAO's Voluntary Guidelines for Catch Documentation Schemes (CDS – from here on "CDS Guidelines") must therefore provide an ambitious, best-practice guideline that encourages and motivates the incorporation of CDS in all major commercial fisheries management regimes.

With this preamble, in the following we provide a number of recommendations for the revision of the draft CDS Guidelines (version entitled "Draft Guidelines Following the Resumed Technical Consultation Session of 14 July 2016"). These are non-exhaustive, time-bound (i.e. March 2017) reflections. WWF welcomes the opportunity to engage in future discussions on the CDS Guidelines leading up to their endorsement.

Scope of CDS Guidelines

The CDS Guidelines state that "every effort should be made to ensure that CDS are only implemented where they can be an effective means to prevent products derived from IUU fishing from entering the supply chain" (see Section 4d.). We fundamentally disagree with this statement. The definition of CDS provided in the document is very short-sighted. CDS should be a best-practice measure incorporated into all commercial fisheries management regimes - to improve data collection and fishing transparency, ensure product traceability, and generally encourage and drive good fisheries management practices. Once effective CDS processes are in place, individual fisheries and/or supply chains should be assessed for risk of being associated with IUU fishing activities, and indeed, more scrutiny for verifications should be applied to high risk fisheries/supply chains. But the practices driven by a CDS are as beneficial to fisheries with low to medium risk of being associated with IUU fishing, than they are to high risk fisheries/supply chains.

In the long term, fisheries management practitioners need to work towards a globally interoperable CDS, covering all major commercial fisheries. In the interim, effort needs to be made to ensure that newly developed CDS adhere to the same high standards, compliment already existing schemes, and wherever possible, approaches are either multi-species and/or regional/multilateral.

Recommendation 1: We strongly urge the Technical Working Group to revise the scope of the CDS Guidelines. CDS need to be considered far more than just an IUU fishing management tool, and this needs to be reflected throughout the CDS Guidelines.

### Validation vs. Verification of Information & Cooperation Among States

It is imperative that all States (flag, coastal, port, market) understand and execute their roles and responsibilities, and cooperate effectively, to validate and/or verify CDS information. All States having jurisdiction over any of the persons, vessels, or activities covered by a CDS must take full responsibility for validating and/or verifying information regarding compliance with their laws and regulations. This does not diminish the ultimate responsibility of the flag State for the behaviour of its vessels and its nationals. It does, however, recognise that flag States should not be in a position to unilaterally validate compliance with coastal or port State regulations (and equally, that coastal States should not be in a position to unilaterally validate compliance with flag or port State regulations). CDS need to define clear roles and responsibilities for each State along the supply chain, as well as clearly define procedures for “validation” and “verification” of CDS information.

Recommendation 2: We urge the Technical Working Group to clearly articulate the collaborative approach required among particularly flag, coastal and port States to validate CDS information (and especially articulating that no State should have unilateral validation power); and provide clear definitions for “validation” vs. “verification” of CDS information.

### Key Data Elements

Effective CDS need to be built on comprehensive, standardised data sets. It is imperative to clearly define what is meant by each of the information elements of the CDS, exactly what information is desired to be collected, in what units, and how. This is particularly important in order to allow for effective risk analyses to be carried out, and to allow for the effective establishment of legal provenance of the fisheries products. Data elements need to reflect best practices in fisheries monitoring, control and surveillance (MCS), including reliance on unique vessel identifiers, transparent vessel registrations (including beneficial ownership), transparent licensing regimes, port-to-port satellite vessel tracking, on-board observer systems, and verifiable catch documentation captured wherever possible, in digital form no later than at, or immediately after the point of first landing.

Recommendation 3: We urge the Technical Working Group to clearly articulate the need for standardised, comprehensive data that reflect MCS best practices, for effective CDS; and the need to define processes for the collection of data and filling out of CDS information fields.

### Electronic CDS

As the CDS Guidelines rightly highlight, CDS need to become wherever possible, electronic in order to be most effective and efficient. However, capturing information in digital format is not enough to increase efficiency. IT systems should nowadays be able to facilitate the automated verification of

CDS information, presuming that data collection is effective and standardised. Key functions that electronic CDS should endeavour to feature include:

- automated verification of CDS information
- automated mass balancing of weights for the cases of split consignments covered by one catch document
- cross-checking of conversion factors for processed products
- strategic analysis of catch document information to identify trade anomalies, shifts in trade flows, new operators/trading partners, and to assist in risk analyses”

Recommendation 4: We urge the Technical Working Group to clearly articulate the ambition for electronic systems to facilitate the efficiency of CDS, including assisting in the automated verification of CDS information.

### Need For Regular Revision

In a world where new technologies regularly emerge, and political circumstances frequently change, it is important to secure the opportunity to regularly revise the CDS Guidelines, in order to reflect newly acquired best practices and lessons-learnt.

Recommendation 5: We urge the Technical Working Group to clearly articulate the plan to revise the CDS Guidelines within three years of its first adoption.

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