

Indian Ocean Tuna Commission (IOTC) Catch Documentation Scheme (CDS) Concept Paper –  
Summary of responses from Catch Documentation Scheme Working Group (CDS-WG) Participants

20 December 2024 – Rev1 14/01/2025

Following the Tenth Meeting of the Catch Documentation Scheme Working Group (CDS-WG), Participants considered paper IOTC-2024-CDSWG10-02 on the IOTC Catch Documentation Scheme (CDS). Reflecting the discussion of the CDS-WG, several small amendments were made to IOTC-2024-CDSWG10-02. Many participants noted that they had not had sufficient time to consider the paper and it was agreed that Participants be given four weeks to provide their input. Three responses were received from Participants.

For input that was minor in nature, IOTC-2024-CDSWG10-02 was updated and the changes reflected in track changes. For more substantive input, a table (Table 1) has been prepared that includes the comments by Participants and a response with recommendations for next steps.

It is clear that several substantive issues remain and these need to be raised by the relevant Participants for discussion by the CDS-WG. These substantive issues need to be resolved to inform the advancement of the Functional Description and draft Resolution.

Where input is the same in Part One and Part Two of the paper IOTC-2024-CDSWG10-02, these have usually been reflected in Table one only once.

New proposed paragraphs for the draft Resolution have been directly included in track changes or in comments.

For paragraphs that have been proposed for deletion, these have been retained and it is recommended that these be discussed at the CDS-WG.

No changes have been made to the draft Resolution annexes. It will be more efficient to progress these once the substantive issues have been addressed and an approach agreed.

Table 1

Input	Reply
<p>In relation to the proposed Scope of IOTC's CDS –</p> <p>Most countries already employ catch documentation schemes that are compliant with various requirements from market states. Without harmonisation across the board, this would place undue burden on developing states who would be required to complete catch documentation information in a variety of formats. This also introduces significant redundancy and could potentially compromise the quality of data. Any text on data harmonisation should be delivered early on, in the context of both principles, and actual implementation.</p> <p><b>Maldives</b></p>	<p>It is unclear if an assessment of national CDS has been undertaken and therefore what would be required for harmonisation.</p> <p>For consideration by the CDS Working Group (CDS-WG).</p>
<p>In relation to Phase 1 of Implementation –</p> <p>The current structure and design of the eCDS is too complex, ambitious and burdensome. The focus should be on Bigeye tuna first, with the scope to explore expansion to include other species.</p> <p><b>Maldives</b></p>	<p>The e-CDS has been designed to meet the Objective of the CDS in the most efficient, integrated and streamlined way to reduce the burden on CDS.</p> <p>The CDS-WG has agreed, through the IOTC Catch Documentation Scheme Strategy (Version 4.0), the IOTC Catch Documentation Scheme Strategy Companion (Version 1.0) to a phased approach that would eventually cover all IOTC species. This passed approach is reflected in the concept paper and draft resolution.</p> <p>For consideration by the CDS-WG.</p>
<p>In relation to Phase 1 of Implementation –</p> <p>Why not transhipped?</p> <p><b>Maldives</b></p>	<p>Phase I includes “exported from point of landing” and reflects the desire of the IOTC to have, in the first phase, a trade-based CDS.</p> <p>It is not clear why “transshipment” in this part is required and clarification is needed.</p>
<p>In relation to Phase 2 of Implementation –</p> <p>Important to consider smaller scale fisheries which produce comparatively less yield per trip,</p>	<p>For consideration by the CDS-WG.</p>

Input	Reply
<p>resulting in the catches across several vessels and trips being pooled to form one viable export consignment. The current e-CDS design is not practically implementable in such cases.</p> <p><b>Maldives</b></p>	
<p>In relation to Phase 5 of Implementation –</p> <p>This places a substantial burden on artisanal and subsistence-based non-export-oriented fisheries to move from a catch estimation system to a complete enumeration system, in order to comply with the implementation of the fifth phase.</p> <p>Suggest removing.</p> <p><b>Maldives</b></p>	<p>For consideration by the CDS-WG.</p>
<p>In relation to the Functional Description, Issue an ICD part 1c –</p> <p>The database must be structured such that lists can be inputted in the data fields (comma-separated, or otherwise), since staff logging data from fisheries such as PL cannot spend extensive amounts of time inputting data on the tens of vessels associated with a single export consignment.</p> <p><b>Maldives</b></p>	<p>The ICD (as opposed to the sICD) is for vessels included on the IOTC Record for Authorised Vessels and it is recommended that a single ICD be issued for each vessel and each trip, thus ensuring traceability.</p> <p>The e-CDS has been designed to integrate the IOTC Record for Authorised Vessels therefore a dropdown list is provided to automatically populate the vessel details included on the IOTC Record of Authorised Vessels for that vessel. Therefore data entry requirements are minimal.</p>
<p>In relation to the Functional Description, Complete an ICD –</p> <p>The data that goes into this section should be made in bulk. A frozen skipjack shipment (3000t) would consist of multiple vessels, multiple dates and multiple catches. The EU Catch document has an annex B feature, which could be utilised in the IOTC catch documentation scheme.</p> <p><b>Maldives</b></p>	<p>The ICD (as opposed to the sICD) is for vessels included on the IOTC Record for Authorised Vessels and it is recommended that a single ICD be issued for each vessel and each trip, thus ensuring traceability.</p> <p>The ICD relates to <i>catch</i> that is <i>landed</i> and provides the bases for export documents. Therefore, the concern that a shipment would consist of multiple vessels, multiple dates and multiple catches relates to export documents.</p> <p>This issue could be resolved by changes to the design of export documents, i.e. and export document can reflect multiple catch documents.</p> <p>For consideration by the CDS-WG.</p>

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<p>In relation to the Functional Description, Complete an ICD part 2c –</p> <p>Vessel representatives would be required to complete 2 datasets for countries implementing catch logbook systems. This is burdensome and may result in a drop in quality and quantity of logbook data.</p> <p><b>Maldives</b></p>	<p>For consideration by the CDS-WG.</p>
<p>In relation to the Functional Description, Complete an ICD part 2c (EEZ) –</p> <p>Alternatively, this could be automatic for fisheries that do not venture out beyond EEZs.</p> <p><b>Maldives</b></p>	<p>This data field could be constrained to only show the relevant EEZ for the user, to avoid a long dropdown list.</p> <p>The data field could also be constrained to only show the one options, EEZ, but it would seem a bit too much work for development as only two options, EEZ and IOTC Area would be included. Retaining make the e-CD more flexible and avoids extra development costs when a CPC may change from EEZ only.</p> <p>For consideration by the CDS-WG.</p>
<p>In relation to the Functional Description, Complete an ICD part 2c (Estimated Weight) –</p> <p>If this is manually entered by vessel for each catch certificate, PL-caught consignments will require data entering for tens of vessels, per consignment. This should be moved to a broader consignment level.</p> <p><b>Maldives</b></p>	<p>The ICD (as opposed to the sICD) is for vessels included on the IOTC Record for Authorised Vessels and it is recommended that a single ICD be issued for each vessel and each trip, thus ensuring traceability.</p> <p>The broader consignment level proposed would apply to the design of export documents.</p> <p>This issue could be resolved by changes to the design of export documents, i.e. and export document can reflect multiple catch documents.</p> <p>For consideration by the CDS-WG.</p>
<p>In relation to the Functional Description, Complete an ICD part 2f (Flag State Confirmation) –</p> <p>The database should be structured such that this can be done in bulk.</p> <p><b>Maldives</b></p>	<p>As above. The CPC is proposing a redesign of the e-CDS so that the ICD can reflect multiple vessels.</p> <p>For consideration by the CDS-WG.</p>
<p>In relation to the Functional Description, Complete an ICD part 2i (Recipient) –</p>	<p>It is unclear why the information relating to companies would be considered highly sensitive. It is assumed that this information is</p>

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<p>This is highly sensitive market data. This level of detailed information should not be shared with a database that has so many users and may potentially be available for public-use.</p> <p><b>Maldives</b></p>	<p>available through other sources and is recorded on other types of trade documentation.</p> <p>For consideration by the CDS-WG.</p>
<p>In relation to the Functional Description, Complete an ICD part 2i (Recipient) –</p> <p>Rather than direct information in such cases, unique, anonymised identifiers could be used at various levels of data reporting and dissemination, to maintain data privacy.</p> <p><b>Maldives</b></p>	<p>As above but the e-CDS could be designed that a user can select a recipient using that recipient’s actual details but they are then changed to an anonymised identifiers in the ICD. The selection of a recipient using an anonymised identifiers may be burdensome as the user will need to know what the anonymised identifier is for each recipient.</p> <p>For consideration by the CDS-WG</p>
<p>In relation to the Functional Description, Complete a sICD part 1c (Vessel) –</p> <p>Unless a list can be inputted, this is virtually impossible for small scale fisheries where one export consignment contains fish from a large number of trips.</p> <p><b>Maldives</b></p>	<p>The sICD relates to a single vessel. The “consignment” concerns relate to exports and this issue could be resolved by changes to the design of export documents, i.e. and export document can reflect multiple catch documents.</p> <p>For consideration by the CDS-WG.</p>
<p>In relation to the Functional Description, Complete a sICD part 2a (Fishing Dates) –</p> <p>This is already collected on a sampling basis by observers. Would be extremely difficult to enter manually for tens of vessels within each export consignment, where small scale fisheries are considered.</p> <p><b>Maldives</b></p>	<p>The data that relates to fishing dates needs to be reflected somewhere in the e-CDS if it is to meet its intended Objective.</p> <p>For consideration by the CDS-WG.</p>
<p>In relation to the Functional Description, Complete a sICD part 2b (Fish Caught) –</p> <p>I see estimated weight included under several umbrellas. Would be helpful to have clarity on the need for collecting estimated weight at different levels, alongside confirmed weight at port. Weight by catch is already collected, aggregated and reported to the IOTC.</p> <p><b>Maldives</b></p>	<p>Estimated weight is included as it can be difficult for fishing vessels to confirm the actual weight. The verified weight is established at landing and is important for exports.</p> <p>For consideration by the CDS-WG.</p>
<p>In relation to the Functional Description, IOTC Export Document –</p>	<p>Yes, combining catch from an ICD and a sICD may undermine the e-CDS. However, a</p>

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<p>Where a single export consignment consists of catch from both IOTC authorised vessels and unauthorised vessels, will there need to be two documents to accompany a single shipment?</p> <p><b>Maldives</b></p>	<p>redesign of the approach to exports as they relate to sICDs may be required.</p> <p>For consideration by the CDS-WG.</p>
<p>In relation to the Functional Description, Complete an IED 2c (Import Details) –</p> <p>Same comment as above regarding data privacy and market sensitivity.</p> <p><b>Maldives</b></p>	<p>It is unclear why the information relating to companies would be considered highly sensitive. It is assumed that this information is available through other sources and is recorded on other types of trade documentation.</p> <p>For consideration by the CDS-WG.</p>
<p>In relation to the Draft Resolution Objective –</p> <p>There are already measures within both the IOTC data framework and market-based measures to support this. Developing a new database that replicates a lot of data that is already being collected in their own individual format can be put undue burden on developing Coastal States and SIDS.</p> <p><b>Maldives</b></p>	<p>The IOTC has agreed to an IOTC CDS and e-CDS.</p> <p>For consideration by the CDS-WG.</p>
<p>In relation to the Draft Resolution Goals –</p> <p>Important to stress that the quality of data is crucial in the application of the scheme to achieve the set objective. It should be considered how much the quality is likely to be compromised in its implementation, especially considering existing mechanisms.</p> <p><b>Maldives</b></p>	<p>For consideration by the CDS-WG.</p>
<p>In relation to the Draft Resolution Goals –</p> <p>We should focus on strengthening the existing catch reporting systems rather than developing brand new ones.</p> <p><b>Maldives</b></p>	<p>For consideration by the CDS-WG.</p>
<p>In relation to the Draft Resolution Scope –</p> <p>The scheme should apply to Bigeye tuna first.</p> <p><b>Maldives</b></p>	<p>The CDS-WG agreed that in the first instance, the CDS would apply to the o Yellowfin tuna, Skipjack, Bigeye tuna and Swordfish and would apply to other IOTC Species in a phased approach.</p> <p>For consideration by the CDS-WG.</p>

Input	Reply
<p>In relation to the Draft Resolution Scope – The reviewer deleted all phases for implementations and suggested text that states – The second of the phase of the eCDS shall be decided by the Commission after evaluating the performance of the first phase.</p> <p><b>Maldives</b></p>	<p>The CDS-WG agreed to a phased approach to CDS implementation and the draft Resolution provides this.</p> <p>For consideration by the CDS-WG.</p>
<p>In relation to the Draft Resolution Implementation – A number of IOTC Resolutions, including the ones on catch data reporting and Regional Observer Scheme support this. We should be strengthening existing mechanisms.</p> <p><b>Maldives</b></p>	<p>For consideration by the CDS-WG.</p>
<p>In relation to the Draft Resolution Implementation Role of the IOTC Executive Secretary (paragraph 42) – Refer to Resolution 12/02 (Data confidentiality policy and procedures).</p> <p><b>Maldives</b></p>	<p>More detailed is required to understand that the reviewer is suggesting.</p>
<p>In relation to the Draft Resolution Implementation Role of the Commission (paragraph 43) – This may take extensive amounts of time and complete harmonisation may not be feasible. This would result in the issuing of catch documents for the same consignment in 2 different formats.</p> <p><b>Maldives</b></p>	<p>Paragraph 43 is about CPCs encouraging the cooperation of NCPs that trade in IOTC Species. It is up to CPCs to decide on the nature of this encouragement and harmonisations is not suggested.</p> <p>It is unclear how this would require the issuing of catch documents for the same consignment in 2 different formats.</p> <p>More detailed is required to understand that the reviewer is suggesting.</p>
<p>In relation to Annex I, IOTC Catch Document Part 3 (Fishing Dates) – A canned tuna export container will consist of in the case of Maldives, 478 vessels fishing on 250 days. So there is a possibility that it will have 119,500 catch documents.</p> <p><b>Maldives</b></p>	<p>An ICD applies for vessels included on the IOTC Record of Fishing Vessels.</p> <p>And ICD is issued for a single vessel for a fishing trip.</p> <p>The ICD does not relate to exports.</p> <p>It is unclear how 119,500 catch documents has been calculated.</p> <p>More detailed is required to understand that the reviewer is suggesting.</p>

Input	Reply
<p>In relation to the Functional Description, Issue an ICD part 1c (Vessel) –</p> <p>Alternatively, 1c could be populated automatically with all the fields included in the IOTC Record of Authorised Vessels instead of picking specific data fields.</p> <p>If a decision is taken to include specific data fields, we recommend adding a field on gear or catching method. This information is already captured in the IOTC Record of Authorised Vessels - data field (n) - and allows the authority to verify that the event owner has carried out such activity in a lawful way. For example, ICCAT's eBCD has a database of gear codes that are internationally accepted. These descriptions should be aligned with FAO's International Standard Statistical Classification of Fishing Gear.</p> <p><b>Maldives</b></p>	<p>Could be developed in the e-CDS.</p> <p>For consideration by the CDS-WG.</p>
<p>In relation to the Functional Description, Complete an ICD part 2b (Fish Caught) –</p> <p>The use of IOTC Area should be changed to the FAO major fishing subarea should be used. An even higher resolution fishing area would be preferred.</p> <p><b>Maldives</b></p>	<p>For consideration by the CDS-WG.</p>
<p>In relation to Scope –</p> <p>A change has been suggested from:</p> <p>The IOTC CDS applies to all species covered by the IOTC Agreement (IOTC Species) in all product forms, fished by CPCs within the IOTC area of competence, and subsequently landed and traded</p> <p>to:</p> <p>The IOTC CDS applies first to the three tropical tuna species (Bigeye tuna, Skipjack tuna and Yellowfin tuna) and Swordfish in a stepwise manner in all product forms, fished by CPCs within the IOTC area of competence, and subsequently landed and traded. The Commission should consider whether all IOTC species should be covered in the long run, with consideration given to including shark species</p>	<p>The Scope has been drafted to reflect the Objective of the CDS and the ultimate application of the CDS. Thus it is ambitious.</p> <p>This Scope will be achieved, in time, through a phased approach to implementation and this reflects the IOTC Catch Documentation Scheme Strategy.</p> <p>It is recommended that the Scope be retained to reflect the Objective of the CDS.</p> <p>For consideration by the CDS-WG.</p>



Input	Reply
<p>with the comment:</p> <p>For consistency with the CDS Strategy endorsed at S27.</p> <p><b>Japan</b></p>	
<p>In relation to Implementation –</p> <p>A change has been suggested from:</p> <p>The IOTC CDS may be implemented by CPCs on a voluntary basis ahead of the phased approach. For those CPCs that implement the IOTC CDS, including on a voluntary basis, reporting under the IOTC Bigeye Tuna Statistical document programme will no longer be required.</p> <p>to:</p> <p>The IOTC CDS must be tested by CPCs ahead of the mandatory phase. For those CPCs that implement the IOTC CDS, reporting under the IOTC Bigeye Tuna Statistical document programme will no longer be required.</p> <p>with the comment:</p> <p>Japan emphasizes the importance of everyone testing the e-CDS before mandatory implementation.</p> <p><b>Japan</b></p>	<p>The paragraph being amended relates to voluntary implementation which is different to testing.</p> <p>Robust testing is implicit in the design process.</p> <p>For consideration by the CDS-WG.</p>
<p>In relation to Implementation –</p> <p>Will canned products be covered by the IOTC CDS?</p> <p><b>Japan</b></p>	<p>For consideration by the CDS-WG.</p>
<p>In relation to Implementation –</p> <p>The CDS-WG needs to discuss how to achieve the phased approach (e.g., a priority species, priority product types, etc.).</p> <p><b>Japan</b></p>	<p>For consideration by the CDS-WG.</p>
<p>In relation to Application –</p> <p>The cost-benefit analysis is very important. Japan suggests the cost estimate be included in this document. Additionally, the CDS-WG needs to discuss how CPCs share the cost.</p> <p><b>Japan</b></p>	<p>An approach to understand costs has been developed. This will require information from all CPCs.</p> <p>For consideration by the CDS-WG.</p>

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<p>In relation to Application –</p> <p>Could you provide a layout of Drupal to have more concrete images on it? Does Drupal have sufficient security to protect the information recorded in CDS? Given the fact that many small-scale fishers will access the IOTC CDS, an accessible tool, such as an app accessed by smartphone or tablet, is very important.</p> <p><b>Japan</b></p>	<p>Unclear what is meant by a layout of Drupal nor what images are required.</p> <p>Drupal does have sufficient security to protect the information recorded in CDS. For example, several financial institutions use Drupal and their Content Management System (CMS).</p> <p>Drupal is only one CMS platform that could be used and was only highlighted as an example.</p> <p>Drupal can be used with any devices including smartphones and tablets.</p>
<p>In relation to roles and responsibilities –</p> <p>At this point, Japan has a significant concern on the suggested user roles and responsibilities, particularly a person who creates CDS. In the suggested approach, a CDS contact officer, possibly a government officer, will create an ICD and invite a vessel representative to provide the necessary information. This would not be practical because a CDS contact officer cannot know when an ICD needs to be created. Instead, in other tuna CDS and SDP, a vessel representative or exporter has a primary role in creating and completing the relevant section of the documentation, and a government officer has a role in validating the documentation. We strongly suggest the IOTC CDS follow similar schemes in tuna RFMOs.</p> <p>We reserve the right to provide more comments at a later stage.</p> <p><b>Japan</b></p>	<p>CDS Contact Officers and Flag Officials can create catch documents in the CDS.</p> <p>The Flag Official Role can be assigned to any individual and this could be a vessel representative.</p> <p>For consideration by the CDS-WG.</p>
<p>In relation to Application –</p> <p>The treatment of chartered vessels needs to be discussed at the CDS-WG.</p> <p><b>Japan</b></p>	<p>For consideration by the CDS-WG.</p>
<p>In relation to Application –</p> <p>The role of port state needs to be discussed at the CDS WG.</p> <p><b>Japan</b></p>	<p>For consideration by the CDS-WG.</p>

Input	Reply
<p>In relation to Functional Specification, Complete an ICS part 2g (Verified Weight) –</p> <p>Feasibility of landing weight verification at landing ports should be discussed at the CDS-WG.</p> <p><b>Japan</b></p>	<p>For consideration by the CDS-WG.</p>
<p>In relation to Staffing –</p> <p>While Japan recognizes the need for additional staff in the Secretariat, we would like to emphasize that the software company/developer should have a primary role in customer service and troubleshooting due to the technical nature of e-CDS. The running cost associated with such customer care should be discussed at the CDS-WG.</p> <p><b>Japan</b></p>	<p>For consideration by the CDS-WG.</p>
<p>In relation to Training –</p> <p>Allowing NCPs to access the IOTC e-CDS has a merit to collect trade information by NCPs. This should be a discussion point by the CDS-WG.</p> <p>Japan</p>	<p>For consideration by the CDS-WG.</p>
<p>In relation to draft Resolution preamble –</p> <p>The roles and obligations of coastal/port states in the IOTC CDS need to be discussed, especially to prevent unnecessary burden on them.</p> <p><b>Japan</b></p>	<p>For consideration by the CDS-WG.</p>
<p>In relation to the draft Resolution, e-CDS –</p> <p>While Japan supports e-CDS, a paper-based approach needs to be discussed as an alternative in the event of a force majeure, such as the web system down.</p> <p><b>Japan</b></p>	<p>For consideration by the CDS-WG.</p>
<p>In relation to the draft Resolution, Implementation –</p> <p>Paragraph 26 is considered not necessary nor feasible.</p> <p><b>Japan</b></p>	<p>For consideration by the CDS-WG.</p>

Input	Reply
<p>In relation to the draft Resolution, paragraph 46 – This could be premature to describe. <b>Japan</b></p>	<p>For consideration by the CDS-WG.</p>
<p>In relation to the draft Resolution, paragraph 48 – While this is an interesting idea, probably first we need to know if other tuna RFMOs are working on similar CDS matters, and if they are interested in joining the IOTC system. With this, it could be very useful if the Secretariat will gather information from other tuna RFMOs on their status of CDS development. <b>Japan</b></p>	<p>For consideration by the CDS-WG.</p>