

Original language: English and French

RESPONSES TO REQUESTS FOR CLARIFICATION ROP-BFT

Topic	Clarification sought	
Transfers	During the past season, we saw more at-sea transfer from the seine to two cages (or more) simultaneously. Can you please detail the official procedure to be followed in terms of PTN, video, ITD and eBCD production?	From an operational point of view: The cages nearest to the fishing boat have a capacity of 200 t. The transfer into two different cages and individually caused significant mortality because the door of the purse seine closed in the middle of the crossover operation of the fish which led to entanglement and a large number of fish died. Distribution between the two cages meant that there was more living space. From the point of view of requirements on monitoring and control of the transfer operations: As to transfer authorisations, it was reported that in accordance with the provisions of Rec. 14-04 regarding documentation of transfer operations and product traceability, each towing vessel is obliged to carry onboard the transfer authorisation. In this regard, and given that it was a single fishing operation, in compliance with the provisions of Rec. 14-04, two (02) different transfer authorisation documents were issued but with the same transfer authorisation number (DZA/2017/002/1 and DZA/2017/002/2). It should also be noted that in accordance with provisions of the same recommendation, an eBCD is issued for each fishing operation. On this basis, a single eBCD was issued for this fishing operation and the number was indicated in part 4 on transfers. In relation to video recordings and in order to ensure control and counting of the number of specimens, two (02) videos were installed to film the transfer operation: the first was located between the door separating the purse seine from the first cage and the second between the two transport cages. The first video showed the total number of fish caught while the second showed the amount that had crossed over into the second cage.

<p>Group eBCDs</p>	<p>At the time of caging, relevant BCDs may be grouped as a “Grouped BCD” with a new BCD number in the following cases, provided that caging of all the fish is conducted on the same day and all the fish is caged in the same farming cage: a) Multiple catches made by the same vessel b) Catches made by JFO The Grouped BCD shall replace all the related original BCDs and be accompanied by the list of all the associated BCD numbers. The copies of such associated BCDs shall be made available upon request of CPCs.</p> <p>Is that OK to have two caging operations and only one eBCD? Or it should be one eBCD per caging operation?</p> <p>During this caging season, a big gap has been observed between the caging operations at sea and the issuing of the official document (eBCD and ICD when any) to the observer. Can you give a maximum number of days between the caging operation and the signature of the documentation by the observer, or is this bounded only by the length of requested deployment of that particular observer?</p>	
<p>Caging authorisation information</p>	<p>Information in caging authorisations is often inconsistent with information in the ITDs and eBCDs. In these cases, should the observer sign the ICD / eBCD?</p>	
<p>Caging authorisation</p>	<p>In annex 8, of Rec. 14-04, the caging authorisation number is required to be shown. The assumption is that this authorisation number should follow the format of the transfer authorisation number set out in para 72. As no authorisation number format is established in the caging operations section (para 78-86). However, it is noted that several CPCs use different formats for caging authorisation which are completely different to that described in para 72. Furthermore, one caging authorisation may be used to cover several different caging authorisations, including control cagings. Is this permissible?</p>	

Cage numbers	<p>Rec. 14-04 states that: CPCs shall assign a unique number to all cages. Numbers shall be issued with a unique numbering system that includes at least the three letter CPC code followed by three numbers. Is the at least referring only to the 3 letter CPC code, or can the cage number also include more than 3 numbers. For example, several towing cages were noted to have an additional letter after the 3 numbers. Is this permissible?</p>	
Cage numbers	<p>Following on from the above point, it was noted that cage numbers are often transferred from the donor cage to the receiving cage (which was unnumbered) following the operation. The implication is that the receiving cage does not have a unique number, or that this number is the same as the donor cage. Is this permissible? In these cases, it is permissible for the observer to sign the ICD and eBCD?</p>	
Intra farm transfers and control cagings	<p>Intra-farm transfers are often carried out as control operations following inconclusive caging videos. However, as previously stated these often do not have a separate authorisation. In these cases, can the observer view this footage to verify the amount of tuna caged? Furthermore, can the observer sign the eBCD / ICD?</p>	