

TECHNICAL AND COMPLIANCE COMMITTEE

Sixteenth Regular Session Electronic Meeting

23 – 29 September 2020

ANNUAL REPORT ON WCPFC TRANSHIPMENT REPORTING

WCPFC-TCC16-2020-RP03_rev1¹ 10 December 2020

Paper prepared by the Secretariat

Purpose

1. This paper summarises transhipment activities from 1 January 2019 to 30 June 2020 from data held by the Secretariat. The management and reporting arrangements for the reported transhipments relate mostly to high seas transhipment activities in accordance with the Conservation and Management Measure on the Regulation of Transhipment (CMM 2009-06).

Background

- 2. In the WCPFC Convention (the Convention), 'Transhipment' means "the unloading of all or any of the fish onboard a fishing vessel to another fishing vessel either at sea or in port" (Article 1 (h)). Article 29 (1) of the Convention states, as a general rule, "in order to support efforts to ensure accurate reporting of catches, the members of the Commission shall encourage their fishing vessels, to the extent practicable, to conduct transhipment in port." Consequently, the Commission adopted CMM 2009-06, which sets out the different requirements for transhipments for purse seine vessels and for other vessels (longline, troll and pole and line). This CMM prevents transhipment on the high seas for all vessels. However, the CMM does provides for exemptions² where a CCM has determined that it is impracticable for certain vessels to operate without being able to tranship out of a port and where the CMM has advised the Commission of this and followed the process set out.
- 3. CMM 2009-06 also operationalizes several of the Convention's Article 29 requirements including:
 - iterating Article 29(2) and confirming that transhipment at a port or in an area within the waters under the national jurisdiction of a member of the Commission, shall take place in accordance with national laws (CMM 2009-06, paragraph 4);

¹ Rev1 replaces the original version posted on 31 August 2020 and includes an editorial corrections in paragraph 11, 14 and Table 1.

² Paragraphs 25 and 34 of CMM 2009-06

³ Paragraphs 26-31 (purse seine) and 37 (other vessels) of CMM 2009-06 sets out the guidelines for determining an exemption

- elaborating on procedures prefaced in Article 29(3) by establishing reporting procedures for CCMs to submit data on the quantity and species transhipped in port and at sea (CMM 2009-06 paragraph 10 -12);
- establishing terms and conditions for transhipments in areas beyond national jurisdiction (Convention Article 29(4) and Annex III (4)) including the required reporting and the requirement for an observer from the regional observer programme to monitor and verify high seas transhipments (CMM 2009-06, para 14 17 and 35);⁴ and
- establishing procedures in accordance with the Convention's Article 29(5) to support the Commissions adoption of specific exemptions for existing operations, from the prohibition on transhipment at sea by purse seine vessels (CMM 2009-06 25 32).

Scope of this paper

- 4. The summary of transhipment activities covers the following areas:
 - Authorisations to tranship on the high seas;
 - Consideration of COVID-19 related Commission decisions on transhipment activities;
 - Review of information reported on high seas pre-transhipment notices and post-transhipment declarations, with a focus on 2019 and the first six months of 2020;
 - Review of CCM implementation;
 - Cross-verification of high seas transhipment activity and monitoring of high seas transhipment reporting; and
 - Secretariat Administrative notes

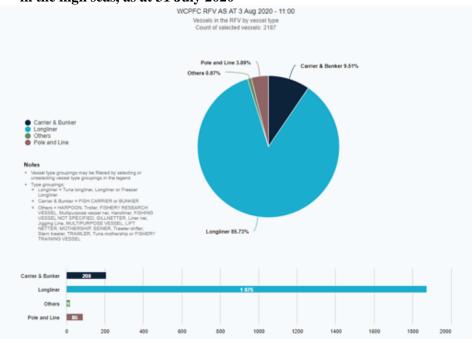
Authorisations to tranship on the high seas

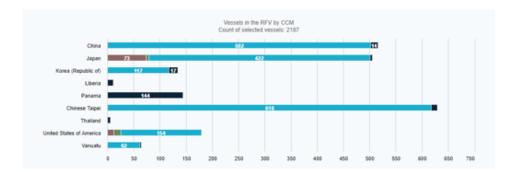
- 5. As at 30 June 2020, 2187 out of 3503 vessels (62 %) on the Record of Fishing Vessels (RFV) flagged to 9 CCMs are authorised to tranship in the high seas in accordance with CMM 2014-03.⁵ By implication, the remaining vessels are understood to be notified as not authorised to tranship on the high seas. Most vessels authorised to tranship on the high seas are longliners/tuna longliners along with carriers, troll vessels, as well as support vessels and some purse seine vessels.
- 6. A summary of the vessels that are authorised to tranship in the high seas as contained in the WCPFC RFV as at 31 July 2020 is provided in Figure 1 below.

⁴ All general transhipment reporting inquiries and reporting submissions should be directed to the email address: Transshipment@wcpfc.int

⁵ CMM 2014-03 states that the CCM has entered "YES" in RFV "Authorised to tranship on the high seas" to indicate an affirmative determination under para 37 of CMM 2009-06 and that the vessel is authorized to be used for transhipping on the high seas in the Convention Area.

Figure 1. Summary of the vessels contained in the WCPFC RFV with positive determinations by their flag CCM of authorization to tranship in the high seas, as at 31 July 2020





- 7. TCC13 recommended that, where CCMs have made a determination of impracticability (under CMM 2009-06 paragraph 34), those CCMs responsible for reporting against both the offloading and receiving vessels shall 'submit to the Commission a plan detailing what steps it is taking to encourage transhipment to occur in port in the future' as specified under paragraph 35(a)(v) of the transhipment measure (TCC13 Summary Report paragraph 199).
- 8. To date, the Secretariat has prepared papers for TCCs consideration that have among others reviewed CCMs responses to CMM 2009-06 paragraph 34 and 35(a)(ii) and considered draft guidelines for determination of circumstances where it is impracticable for certain vessels to tranship in port or in waters under national jurisdiction pursuant to paragraph 37 of CMM 2009-06.⁶ A summary of CCMs responses to CMM 2009-06 paragraph 34 and 35(a)(ii) in this year's

3

⁶ Refer to WCPFC-TCC12-2016-15_rev2 and WCPFC-TCC9-2013-17

Annual Report Part 2 (covering 2019 activities) is provided in **Annex 1** (refer page 14 of this paper).

Consideration of COVID-19 related Commission decisions on transhipment activities *In-port transhipment by purse seine vessels*

- 9. Transhipment at sea by purse seine vessels is prohibited except in respect of exemptions granted by the Commission for the circumstances set out in paragraph 25 of CMM 2009-06. The process for managing applications for exemptions for vessels that meet stated conditions is set out in paragraphs 26-31 of that CMM. Notwithstanding this exemption, purse seine vessels may not tranship on the high seas in the Convention area.⁷
- 10. On 20 April 2020 a Commission intersessional decision notified in Circular No.:2020/28⁸ was issued. This Circular provided that until May 31, 2020, and without prejudice to the provision that 'transhipment at sea by purse seine vessels shall be prohibited' as stipulated by paragraph 25 of CMM 2009-06, if it is not feasible for a purse seine vessel to tranship in port despite its best efforts due to port closures and relevant access restrictions related to the prevention of COVID-19, that particular vessel may tranship at sea in an area under the jurisdiction of a Port State'. A range of general understandings as to how this would operate were associated with this temporary arrangement.
- 11. Flag State CMMs must notify the Executive Director of each purse seine vessel authorised to engage in transhipment outside of port. As at 31 July 2020, information in the Record of Fishing Vessels (RFV) show there were 56 purse seine vessels flagged to 2 CCMs that were authorised for at-sea transhipment. However, only one of those vessels was a new authorisation in the RFV made after the date of the Commission decision, which is valid for several years. But this information does not provide the full picture of how the temporary arrangement is being interpreted and applied which is not consistent across CCMs. Two CCMs have updated their vessel entries in the RFV to show those purse seine vessels they authorise for at sea transhipments,e two others applied that authority on a case by case basis as part of the notification of the transhipment and one provided a list of those vessels subject to the exemption.

Observer coverage of transhipments

- 12. Circular No.:2020/24 and 2020/38 released on 8 April 2020 set out the Commission intersessional decision to suspend the requirements for observer coverage on purse seine vessels and during transhipments at sea from purse seine vessels, as well as from any transhipments on the high seas. (CMM 2018-05 paragraph 6, CMM 2009-06 paragraph 13-16 inclusive) until 31 May 2020. Subsequent decisions extended the date of effect until 31 July 2020 (Circular No.:2020/46) and then 31 October 2020 (Circular No.:2020/71).
- 13. Of the 409 reported transhipments that took place between 1 April and 18 August 2020, only 11 (around 3 %) were not observed on any of the participating vessels. Initially at least, this shows there has been a limited effect on the level of coverage. Undoubtedly over time this is likely

_

⁷ paragraph 32 of CMM 2009-06

⁸ Circular No.20/28 entitled <u>Commission Decision in response to COVID-19 related to purse seine transhipment activities until 31 May 2020</u>. This Circular was subsequently updated to extend the application of this decision until 31 July 2020 (Circular No.2020/46) and 31 October 2020 (Circular No.2020/71)

to change as ROP observers remaining on trips during the initial months of the COVID-19 outbreak are able to be safely disembarked at their home port or somewhere where it is possible to obtain safe passage home. The uncertainty will remain as to when other observers could be deployed.

Review of information reported on high seas pre-transhipment notices and post-transhipment declarations, with a focus on 2019 and the first six months of 2020

14. WCPFC has received reporting for around 9,004 high seas transhipment events since June 2010, when CMM 2009-06 was implemented. The annual counts of transhipments since the introduction of CMM 2009-06 is shown in **Table 1** (below). It should be noted that reporting related to the 2019 year is under review through the CMS process and 2020 should be considered provisional estimates. Data collected during the initial implementation of the new CMM in 2010 and 2011 remain provisional.

Table 1. Summary of High Seas Transhipments Reported to the WCPFC from June 2010-30 June 2020^9

	Number of reported transhipment events (including events in IATTC waters)	Number of receiving vessels	Number of offloading vessels		
Jun – 31 Dec 2010	229	17	159		
2011	656	22	288		
2012	526	19	237		
2013	593	20	296		
2014	554	25	301		
2015	756	28	304		
2016	955	25	353		
2017	1091	27	450		
2018	1447	32	515		
2019	1472	26	503		
(to 30 June) 2020	725	22	368		
·	9.004		·		

- 15. Details of the high seas transhipment reported to WCPFC for the 2013 2020 period are summarized in **Tables 2 4** (below), and **Table 7** and **Figures 3 7** (refer to **Annexes 2 and 3** on pages 15 20 of this paper). Key points for 2019 and the first 7 months of 2020 based on the information in these tables and figures include:
 - a. The number of reported high seas transhipments for 2019 is 1472, which exceeds the previous high of 1447 seen in 2018. Reporting for 2020 shows the number of transhipments is likely to be similar.
 - b. The preliminary number of reported high seas transhipment events in annual reports that provide data for the dCMR (**Table 2**) was lower than that shown in the Secretariat database of individually notified transhipment events (**Tables 3 a and b**).

5

⁹ It should be noted that reporting related to the 2019 year is under review through the CMS process and 2020 should be considered provisional estimates. Data for 2010 and 2011 should be considered provisional and may include transhipment events that occurred within EEZ areas, and is subject to change

- c. Reasonable proportions of the catch of some species in the WCPFC statistical area are transhipped for example, 34% of bigeye and 27% of albacore emphasizes the need for effective monitoring to support reliable catch estimates as the basis for conservation and management measures.
- d. High seas transhipment activities were reported within most of the high sea's pockets, especially in HSP1 and HSP2, as well as in the more southern part of the Convention Area during 2019/2020;
- e. Despite relatively similar numbers of transhipment events reported in 2018 and 2019, the estimated quantities of longline catch of albacore, bigeye and yellowfin tuna, swordfish and 'other' species were reported as transhipped on the high seas were significantly reduced in 2019 for example, 45% of the 2018 volume of albacore was transhipped in 2019. By comparison, 2017 reports show more catch of the main species transhipped during fewer transhipments than in 2019. (**Tables 3 a and b** below and **Annex 3 Figures 3 7, pages 16-20**);
- f. During 2019, in more western high seas areas of the WCPO there was a greater proportion of albacore reported by quantity transhipped, which transitioned to bigeye and yellowfin in more central areas, and mainly albacore in more eastern and southern areas. Initial indications from 2020 data shows a similar trend to 2019. In 2018 and 2017 the species distribution in transhipments was similar except for the more prevalent presence of albacore in western areas;
- g. The first six months of 2020, is comparable in distribution and reported quantities to the 2019 levels of high seas transhipment events in the high seas;
- h. The list of vessels which CCMs have advised WCPFC of having positive determinations of impracticability in accordance with paragraph 34 of CMM 2009-06 (through the Record of Fishing Vessels), now reflects the majority of vessels that are reported to be involved in high seas transhipments;
- i. Reporting of high seas transhipment events by CCMs has continued to improve. This may be due to a number of factors including the assessment of this obligation under the Compliance Monitoring Scheme; the work that the Secretariat does with CCMs to inform of any reporting gaps early in the year; and CCM familiarity with the reporting requirement, but gaps remain in WCPFC holdings of reported transhipment events; and
- j. The Secretariat notes that there has been the need to clarify the timeliness of several transhipments reports that are noted in CMR reviews as 'Not received, deadline passed' or 'Received past deadline'. This arises when the Secretariat applies the criteria of +/-two days when comparing the estimated transhipment date reported on the pre-transhipment notification (OVN or RVN) to the actual transhipment date reported on the post-transhipment declaration (OVD or RVD). This criterion takes into account CMM 2009-06 requirements and the time zones across the WCPO. If this criterion is met, the data of receipt of the notification is compared to the actual date of the transhipment to check it is at least 36 hours before the transhipment takes place.

Table 2. Provisional summary of transhipments events reported to WCPFC through annual reports for the 2019 calendar year as at August 2020, which may not include CCMs updates provided as part of the dCMR process

		sels in reports		Count of report	ed transhipment even	ts
	As receiving vessels	As offloading vessels	Receiving vessel	Offloading vessel	advance notifications received CMM 09-06 35 a iii)	declarations received CMM 09-06 35 a iv)
China	2	137	120	293	<i>120</i> 293	<i>120</i> 293
Japan		3		3	2	3
Republic of Korea	7	71	187	113	<i>177</i> 107	<i>186</i> 110
Liberia	3		146		146	146
Panama	8		380		318	377
Chinese Taipei	45	233	489	825	466 780	<i>489</i> 811
Vanuatu	1	42	31	122	31 117	31 122
Receiving vessels Offloading vessels	66	486	1353	1356	<i>1258</i> 1299	<i>1349</i> 1339

Table 3 a and b. Number of Transhipment Events Reported by CCMs during June 2010 - 30 July 2020^{10} : by Offload and Receiving Vessels

Table 3 a - Count of events by offloading vessel

Reporting CCM	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Belize	1	5	2	3							
China	102	231	188	186	184	242	313	272	353	356	163
Indonesia	6	21	20	11	3						
Japan	13	40	44	58	31	29	28	28	38	6	2
Kiribati				5							
Korea (Republic of)	19	23	28	43	60	88	79	90	115	125	72
Philippines	5	14	7	4	2						
Solomon Islands			1								
Chinese Taipei	49	263	182	137	174	189	288	530	802	855	446
United States of America				1							
Vanuatu	34	59	54	145	100	208	247	170	139	130	42
	229	656	526	593	554	756	955	1091	1447	1472	725

¹⁰ Tables 2 – 5 include high seas transhipment events that occurred in the IATTC Convention Area.

Table 3 b: Count of events by receiving vessel

Reporting CCM	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Belize				41	16						
China					23			29	93	153	95
Japan	40	70	34					1			
Kiribati	4	52	38	40	134	68					
Korea (Republic of)			18	21	45	83	93	202	232	201	60
Liberia						1	190	247	144	154	42
Panama	6	183	106	52		57	275	279	530	427	228
Papua New Guinea	3										
Chinese Taipei	16	18	20			56	113	204	361	498	283
United States of America				1							
Vanuatu	160	333	310	438	336	491	281	129	88	39	18
	229	656	526	593	554	756	955	1091	1447	1472	725

Table 4. Summary information comparing the reported quantities of highly migratory fish stocks which were reported to have been transhipped in 2019 (which includes events reported to WCPFC that took place in IATTC area) with the 2019 provisional longline catch estimates for the WCPFC Statistical Area

[ALB = albacore, BET = bigeye, YFT = yellowfin, BUM = blue marlin, MLS = striped marlin, SWO = swordfish]

	ALB	BET	YFT	BUM	MLS	SWO
Reported quantities on WCPFC high seas Transhipment Declarations (Mt)	25,534	23,336	15,595	2,732	441	2,983
2019 provisional longline catch estimates in WCPFC Statistical Area (Mt) ¹¹	95,280	68,371	104,440	12,583	3,136	14,673
Reported quantities of high seas transhipments as a % of total provisional catch estimates	26.8%	34.1%	14.9%	21.7%	14.1%	20.3%

16. Monitoring of cases in relation to CMM 2009-06 has occurred since 2015. **Table 5** (below) shows 31 alleged violations of the provisions of this CMM were noted between 2015 and 2019. Investigations of all except two of these have been completed. Most of these cases relate to paragraphs 35 a. ii. and 35 a. iii which are, respectively, the timeframe within which prior notifications of transhipment and transhipment declarations must be notified to the Executive Director.

¹¹ Table 4: Longline catches in WCPFC Statistical Area, by species, and Table 18: Commercial catches of billfish in the WCPFC Statistical Area by gear type and species (<u>SC16-2020/ST-IP-01</u> Estimates of annual catches in the WCPFC statistical area)

Table 5: Article 25 (2) Compliance Case File System records relating to CMM 2009-06

	⊕ Flag CCM Notified	☐ Flag CCM Investigation Completed				Grand Total
Row Labels	*	Infraction - no sanction	Infraction - sanction	Infraction - warning	No infraction	-
□ CMM 2009-06 13		1	2		2	5
2016		1	2		1	4
2017					1	1
□ CMM 2009-06 25	1				3	4
2018	1				2	3
2019					1	1
□ CMM 2009-06 34		2				2
2015		2				2
☐ CMM 2009-06 35 a (iii)		3	2		4	9
2015		2			2	4
2016		1	2		1	4
2019					1	1
☐ CMM 2009-06 35 a (iv)	1	2		1	6	10
2015		2			2	4
2016				1		1
2018					2	2
2019	1				2	3
☐ CMM 2009-06 35 A (V)			1			1
2018			1			1

Implementation of Transhipment related CCMs (2009-06 and 2010-02 06)

Reporting through Annual Report Part 2 and Annual Report Part 1 covering 2019 activities

- 17. CCMs continue to report on their implementation of CMM 2009-06 in the 2020 Annual Report Part 2 covering 2019 activities.
- 18. Twenty three (23) CCMs reported in their fished/did not fish report that they had flagged vessels fishing beyond areas of national jurisdiction and eight (8) of these CCMs had flag vessels involved in high seas transhipment activities in 2019. **Annex 1** (on page 14) provides a summary of CCMs responses in Annual Report Part 2 related to CMM 2009-06 implementation in 2019.
- 19. TCC13 recommended that CCMs report observer coverage achieved for their carrier vessels conducting transhipment at sea, in line with the vessel specifications outlined in paragraph 13 of CMM 2009-06, in their Annual Report Part 2 (TCC13 Summary Report paragraph 200). **Annex 1** (on page 14) provides a summary of CCMs responses against CMM 2009-06 paragraph 13 in Annual Report Part 2. The majority of CCMs who were involved in high seas transhipment in 2019 seemed to affirm that all high seas transhipments conducted in 2019 were 100% covered by observers.
- 20. As per previous years, CCMs were required to report against all transhipment activities covered by CMM 2009-06 (including transhipment activities that occur in ports and in EEZs) in the 2020 Annual Report Part 1 covering 2019 activities (CMM 2009-06 paragraph 11). The report is to be in accordance with the guidelines in Annex II to CMM 2009-06 and to be submitted based

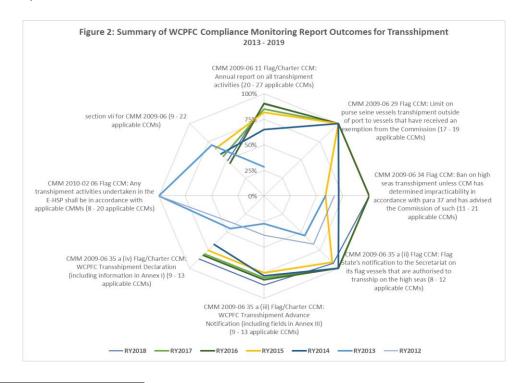
on the template that was approved at WCPFC15. In addition, paragraph 11 says that "In doing so, CCMs shall take all reasonable steps to validate and where possible, correct information received from vessels undertaking transhipment using all available information such as catch and effort data, position data, observer reports and port monitoring data."

21. Since 2015, the Secretariat has progressively expanded its annual transhipment report to include a summary of the information on transhipment activities that CCMs reported annually through Annual Report Part 1 (CMM 2009-06 paragraph 11) in aggregate form¹². **Tables 8A-8D** in **Annex 4** (pages 21-30) summarise CCMs responses from their 2020 Annual Report Part 1 in relation to all transhipment activities covered by CMM 2009-06.

Review of final transhipment implementation under the Compliance Monitoring Scheme

22. **Figure 2** below provides an overview of the outcome of the evaluation of CMM 2009-06 under the Compliance Monitoring Scheme (CMS) over recent years. CMM 2009-06 was evaluated annually from 2013 to 2017 (for Reporting Years 2012 (RY2012) to RY2016). There is an improvement in implementation by applicable CCMs in response to required reporting set out in CMM 2009-06. For example, in RY2013, 30% of the applicable CCMs were assessed as having fully implemented CMM 2009-06 paragraph 11 by providing the required annual report. This improved to 65% for RY 2014, 81% for RY 2015 and 90% for RY 2016. However, meeting deadlines for CMM 2009-06 reporting requirements (section vii for CMM 2009-06) remained an implementation challenge for some CCMs.

Figure 2: Summary of final WCPFC Compliance Monitoring Report Outcomes for Transhipment (2013 – 2019)



¹² This was as tasked by TCC, refer TCC10 Summary Report para 191

_

23. **Annex 5** (pages 31-33) provides a more detailed look at each obligation/paragraph that were assessed and how CCMs have performed under the CMS over the years. These results reflect approved during relevant years' WCPFC Commission meetings.

Cross-verification of high seas transhipment activity and monitoring of high seas transhipment reporting

- 24. In 2019, the Secretariat developed a preliminary WCPFC Transhipment Analysis Tool (the analysis tool) that uses WCPFC VMS data to detect potential high seas incidents. This analysis tool shows where reported WCPFC VMS positions for two vessels indicated they were within 250 metres of each other for at least 4 hours.
- 25. This represents a very preliminary approach to improve the use and analysis of reported data. This will be of significant benefit to both flag CCMs and the Secretariat by improving the ability to validate reported data on transhipments. It will also allow the Secretariat to better support flag CCMs with information to assist in monitoring their fleet's activities and compliance with aspects of CMMs. The tool will also provide the Secretariat with better information with which to detect potential errors/gaps in reported data, to identify potential trends in activity in the WCPF area over time, and to identify potential issues of non-compliance for the attention of the relevant CCMs. This approach reflects the importance of validating reported data on transhipments as a critical part of monitoring the flow of catch within the WCPF area and improving the quality of information used to support Commission management decisions.
- 26. **Table 6 a** below shows the number of incidents of individual vessels being within 250m of another vessel for at least 4 hours that were detected in 2018, 2019 and January July 2020. It should be noted that reporting related to the 2019 year is under review through the CMS process and 2020 reporting should be considered provisional estimates.

Table 6 a: Main features from preliminary analysis of the number of vessels within 250m of each other for at least 4 hours with some criteria for focusing in on vessels for further analysis

		Yea	r
	2018	2019	1 Jan – 31 July 2020
Total number of times one (1) vessel was within 250m of another vessel* for at least 4 hours in Convention Area in waters covered the WCPFC VMS^	2108	2058	1505
# of instances where at least one (1) vessel was a carrier in Convention Area in waters covered the WCPFC VMS^	190	273	251
Event in high seas of Convention Area where two vessels were matched to a reported high seas transhipment declaration	315	407	278
Event could not be matched to a reported high seas transhipment declaration	32	36	26

^{*}Either another fishing vessel, a carrier or a bunker vessel

[^] Waters covered by the WCPFC VMS, includes high seas some areas under national jurisdiction covered by WCPFC VMS

27. The majority of reported high seas transhipment reports (notifications and declarations) received by the Secretariat involved a carrier vessel as the receiving vessel and a longliner as the offloading vessel. There are rare instances of reported transhipment events involving another vessel type that are often due to serious mechanical breakdown which are provided for in CMM 2009-06 paragraph 23 and 24. For this reason, the Secretariat's preliminary analysis focused on matching the potential high seas incidents detected by the WCPFC Transhipment Analysis Tool involving a carrier and a longline vessel. **Table 6 b** shows the number of vessel combinations involved in events occurring in the high seas of the Convention Area where no match could be made to a reported high seas transhipment declaration received by the Secretariat.

Table 6 b: Vessel combinations occurring in the high seas of the Convention Area where there is no match to a reported high seas transhipment declaration

Vessel combinations with no match to reported high seas transhipment declaration	2018	2019	2020
Carrier - carrier	4	7	3
Carrier - bunker	6	5	5
Carrier - longline	22	23	16
Carrier – purse seiner	0	1	2
Total	32	36	26

- 28. There is further work required to refine the analysis tool and the way in which data is selected for analysis across the VMS and other datasets. The information in **Tables 3 a and b** above (pages 7-8) shows that there were more individual events involving two vessels than were detected through VMS. Further analysis is required to assess those events identified in **Table 6 b** to identify whether further validation can be achieved by the Secretariat or the relevant flag CCM.
- 29. The work to incorporate IT solutions that verify high seas transhipment reporting through VMS analysis is still work in progress and remains a priority for the Secretariat to however, progress has been constrained by competing priorities.
- 30. An additional analysis undertaken compares the variance in location between Transhipment Event (TEV) reports and the closest corresponding VMS report. This analysis shows discrepancies of 100km or more for 100 TEV's associated with 86 fishing vessels and 249 TEVs associated with 23 carriers. The range of variance is 100km up to, in a few cases, several thousand kilometers with 8 instances where the variance exceeds 1,000kms and 20 instances for carriers. There are some reasons why some variance would be expected given the VMS reporting timeframe however, further analysis is required assess the potential causes.

Secretariat Administrative notes

31. It is now routine business for the Secretariat to provide detailed supporting documentation to CCMs who are involved in high seas transhipment activities, advising of gaps in data and the timeliness of submissions of transhipment required reports. This information was provided in

April 2020, and updates are provided in the draft Compliance Monitoring Reports released in late July/August. The Secretariat continues to work towards making such information on transhipment reporting gaps available more routinely to relevant CCMs (e.g. through the quarterly report).

- 32. Since April 2020, the Secretariat has provided online access to Authorised Flag CCM users to their high seas transhipment notifications and high seas transhipment declarations as received by WCPFC, including those reports that have been submitted using the WCPFC High Seas Transhipment E-Reporting System APP.¹³ Authorised flag CCM users only have access to the submissions made by or on behalf of their vessels, and not those submitted by another CCM.
- 33. Use of analytical reporting tools available to the Secretariat make it simpler to identify and progressively review and reconcile transhipment notifications and declarations, with assistance from CCMs for clarification where necessary. As a result, reviews to validate data from reported transhipments for 2019 and 2020 (year to date) have been completed, along with a historical review of data for 2018.
- 34. As part of this validation process, the Secretariat has needed to clarify the basis on which the timeliness of transhipment reports is noted in CMR reviews as 'Not received, deadline passed' or 'Received past deadline'. The Secretariat applies the criteria of +/- two days when comparing the estimated transhipment date reported on the pre-transhipment notification (OVN or RVN) to the actual transhipment date reported on the post-transhipment declaration (OVD or RVD). If this criterion is met, the date of receipt of the notification is compared to the actual date of the transhipment to check it is at least 36 hours before the transhipment takes place.

Recommendation

35. TCC16 is invited to consider and note the information contained in the Annual Report on Transhipment.

13

¹³ This is available to authorized flag CCM users at link https://www.wcpfc.int/ccm-transhipment

Summary of CCMs responses in Annual Report Part 2 covering 2019 activities

Summary of CCMs responses in Annual Report Part 2 covering 2019 activities CCM Responses from Annual Report Part 2									
Relevant CMM to be implemented	CCM response on whether CMM is implemented (Yes/No/N/A)	Summary of further information provided by CCM in AR Pt 2							
CMM 2009-06 11 (Annual report on all transhipment activities covered by this Measure (including	21 Yes	Refer to Annual Report Part 1 for information on transhipments carried out/ there were no transhipment activities in 2019							
transhipment activities in ports or EEZs) in accordance with the specified guidelines (Annex II))	16 N/A	No flagged vessels/No flagged vessels fished in 2019/Had flagged vessels in 2019 but none were authorised or did tranship in high seas in 2019.							
CMM 2009-06 13 (CCM shall ensure that vessels they are responsible for carry	19 Yes	Implemented through national legislation/regulation/license terms and conditions / No flagged vessels transhipped in 2019/100% observer coverage							
observers from the WCPFC ROP to observe transhipments at sea)	18 N/A	No flagged vessels/No flagged vessels fished in 2019/Had flagged vessels in 2019 but none were authorised or did tranship in high seas in 2019.							
CMM 2009-06 29 (only authorise those purse seine vessels that that have received an exemption by the Commission to engage in transhipment outside of part. Where applies he flag	13 Yes	Implemented through national legislation/regulation/license terms and conditions / All transhipments happened in port except those approved for at sea during the COVID-19 period / Do not permit transhipment for purse seine							
of port. Where applicable, flag CCM authorisation should be vessel-specific and address any specific conditions identified by the Commission.	23 N/A 1 NO	No flagged purse seiners fished in 2019 / Had flagged purse seine vessels in 2019 but none granted an exemption to tranship out of port.							
CMM 2009-06 34 35(ii) (Ban on high seas transhipment,	11 Yes	Have notified the Secretariat that it is impracticable for flagged longliners to operate without being able to tranship on the high seas; Vessels authorised to tranship in the high seas is indicated in the RFV							
unless a CCM has determined impracticability in accordance with para 37 guidelines and has advised the Commission of such.)	24 N/A	One CCM provided a detailed response on the basis for their determination of impracticability No flagged vessels in 2019/No flagged vessels fished in 2019/Had flagged vessels in 2019 but none were authorised or did tranship in high seas in 2019							
	2 No								
CMM 2009-06 35 a(iii) & a (iv) (reporting prior to high seas	23 Yes	Required reports submitted to the Secretariat or activities were not allowed/CCM does not allow high seas transhipment/No transhipment activities occurred/Regulated under national legislation							
transhipment and declaration after transhipment event)	10 N/A	No flagged vessels/No flagged vessels fished in 2019/Had flagged vessels in 2019 but none were authorised to, or did, tranship in high seas in 2019							
	4 No								

 $ANNEX\ 2$ Table 7. Reported quantities (kgs) of high seas transhipments of highly migratory fish stocks by species by month by year, based on reports received by WCPFC Secretariat from 2019 – July 2020 under CMM 2009-06 para 35 a iv)

Year/Month	ALB	BET	SWO	YFT	OTHERS	Grand Total
2019	25,534,450	23,335,994	2,982,934	15,594,885	11,713,567	79,161,830
1	1,468,219	1,965,055	384,703	721,264	1,128,700	5,667,941
2	2,828,244	1,605,253	193,136	892,136	974,171	6,492,940
3	718,635	3,065,121	179,564	1,199,402	771,637	5,934,359
4	302,417	1,852,326	570,365	1,139,372	694,407	4,558,887
5	1,983,756	2,402,817	252,434	1,480,025	881,689	7,000,721
6	2,791,478	1,001,597	148,862	1,390,446	822,190	6,154,573
7	1,546,154	1,212,511	116,202	965,181	569,597	4,409,645
8	3,845,655	3,200,775	167,925	2,817,067	928,836	10,960,258
9	2,919,678	1,747,893	104,593	1,358,291	565,433	6,695,888
10	3,228,227	2,024,259	333,225	1,790,343	2,076,790	9,452,844
11	2,610,512	1,482,532	241,885	1,046,282	1,368,082	6,749,293
12	1,291,475	1,775,855	290,040	795,076	932,035	5,084,481
2020	12,891,659	12,645,751	1,434,503	8,046,038	5,803,336	40,821,287
1	2,094,301	2,014,392	208,447	1,247,861	1,124,137	6,689,138
2	1,999,099	1,737,978	172,428	974,009	1,312,355	6,195,869
3	1,658,102	2,832,776	674,979	1,274,008	995,098	7,434,963
4	446,533	1,871,040	107,257	1,177,311	969,660	4,571,801
5	784,052	2,033,473	155,322	1,533,569	516,475	5,022,891
6	3,132,783	871,079	60,067	808,420	456,737	5,329,086
7	2,776,789	1,285,013	56,003	1,030,860	428,874	5,577,539
Grand Total	38,426,109	35,981,745	4,417,437	23,640,923	17,516,903	119,983,117

Table 7 included events reported to WCPFC that took place in IATTC area.

Figure 3. Map plotting positions of transhipments of highly migratory fish stocks for January to July 2020, based on reports to WCPFC under CMM 2009-06 paragraph 35 a iv). The graph at top right shows the number of transhipments by month, and the tables at bottom right show the total annual quantities (Mt) of highly migratory fish stocks by species or grouped, as at August 2020, based on reports received by WCPFC. The second map shows the distribution of the species (BET, YFT, ALB, SWO and Others) being transhipped within a 5° x 5° grid for the same period.

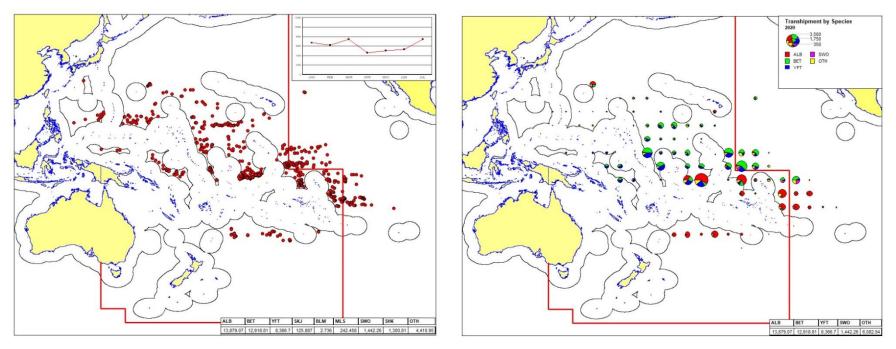


Figure 4. Map plotting positions of transhipments of highly migratory fish stocks for 2019, based on reports to WCPFC under CMM 2009-06 paragraph 35 a iv). The top right insert shows the number of transhipments by month, and the bottom right insert shows the total annual quantities (Mt) of highly migratory fish stocks by species or grouped for 2019, as at August 2020.

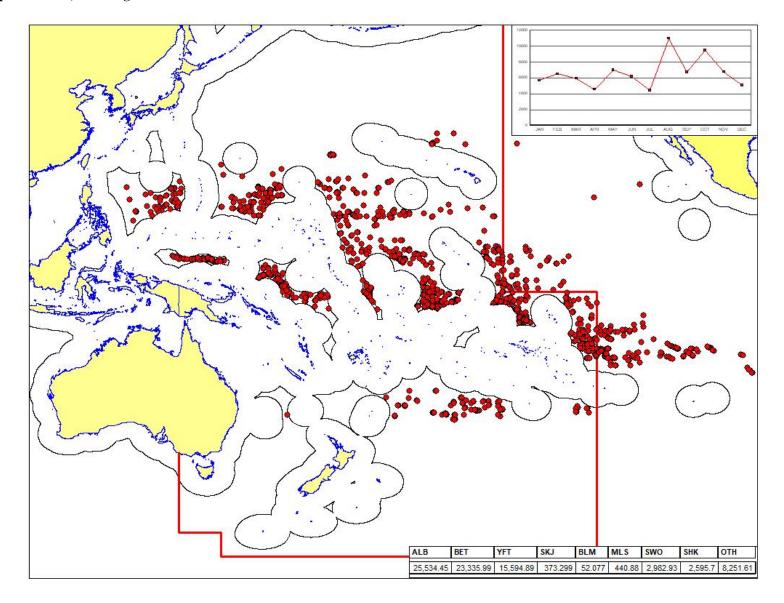


Figure 5: Map shows the distribution of the species being transhipped for 2019. Reported sums of species (kg) transhipped (BET, YFT, ALB, SWO and Others) are within a 5° x 5° grid for the year based on reports received by WCPFC for 2019 under CMM 2009-06 para 35 a iv.

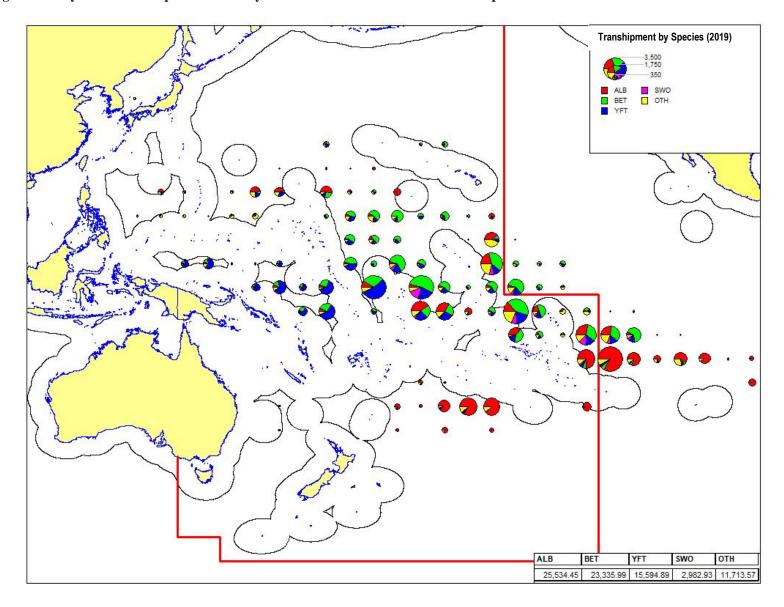


Figure 6. Map plotting positions of transhipments of highly migratory fish stocks for 2018, based on reports to WCPFC under CMM 2009-06 paragraph 35 a iv). The graph at top right shows the number of transhipments by month, and the tables at bottom right show the total annual quantities (Mt) of highly migratory fish stocks by species or grouped. The second map shows the distribution of the species being transhipped for the same period.

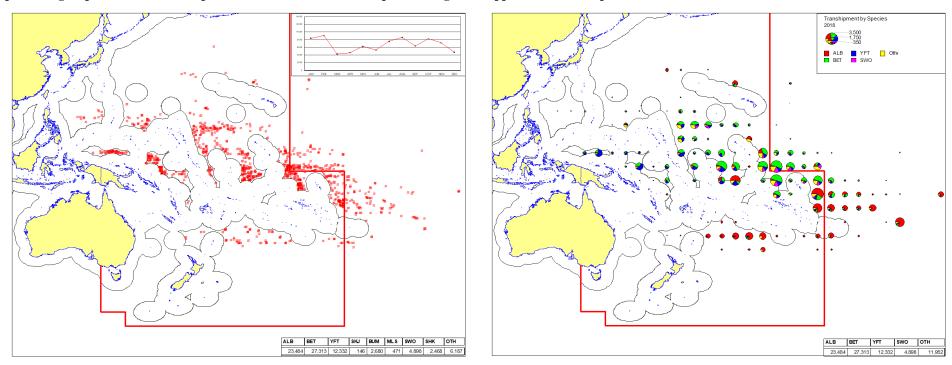
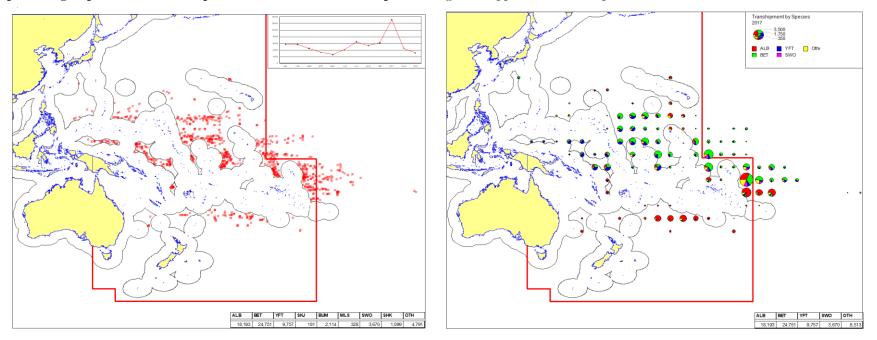


Figure 7. Map plotting positions of transhipments of highly migratory fish stocks for 2017, based on reports to WCPFC under CMM 2009-06 paragraph 35 a iv). The graph at top right shows the number of transhipments by month, and the tables at bottom right show the total annual quantities (Mt) of highly migratory fish stocks by species or grouped. The second map shows the distribution of the species being transhipped for the same period.



ANNEX 4

Table 8A: Summary of CCM reporting of 2019 number of annual transhipments events as reported in Annual Report Part 1 2020 covering 2019 calendar year ¹⁴ based on reports submitted to WCPFC. Note may not include CCM replies in 2020 through feedback on the dCMR.

Reporting	Vessel		anshipments by	Total	Number of tr			of tranship	ment	
CCM	type	location of ca						•		
		Catches in WCPFC area	Catches outside of WCPFC area		WCPFC: in archipelagic & territorial seas	WCPFC: In port	WCPFC: EEZ	WCPFC: high seas	Outside WCPFC: in port	Outside WCPFC: at sea
China	Carrier			117			80			37
Kiribati	Carrier	11		11		11				
Korea	Carrier	614	48	678		459		203		17
Liberia	Carrier			147						
Chinese Taipei	Carrier			628		117		500		11
Panama	Carrier			1604		1205		399		
Philippines	Carrier	10		10		10				
Australia	LL	3		3		0	3			
China	LL			299			3	243		53
FSM	LL	221		221		16		205		
Fiji	LL	8		8						
Japan	LL	249		249						249
Kiribati	LL	109		109		109				
Korea	LL	106	23	129		2		127		14
PG	LL									
Solomon Is	LL	73		73	70	3				
Chinese Taipei	LL			1,015		142		831		42
Vanuatu				423		26	16	190		191

¹⁴ Includes data from 2020 Annual Report Part 1 covering 2019 activities for transhipment reports where the reported information fit into the above template. Some CCMs including those not listed above may have provided a partial report in 2020 Annual Report Part 1, but this was not able to be included in the above table owing to data gaps, designation of confidential data or the use of a format that doesn't transfer easily into the above template (eg gear types were combined or not specified).

EU	PS/LL								
El Salvador	PS								
FSM	PS	133		133		43	6	84	
Kiribati	PS	391		391		391			
Korea	PS	303		303		303			
Nauru	PS	25		25		22	3		
New Zealand	PS	1		1		1			
Philippines	PS	159		159		159			
PG	PS	318		318	302	16			
RMI	PS	112		112		112			
Solomon Is	PS	113		113	91	22			
Chinese Taipei	PS	307		307		307			
Tuvalu	PS	9		9		9			
USA	PS	148	4	152		152			

Table 8B: Summary of CCM reporting of the quantity of fish from annual transhipments offloaded from longline vessels as reported in 2020 Annual Report Part 1 covering the 2019 calendar year ¹⁵ based on reports submitted to WCPFC as at August 2020. Note may not include CCM replies in 2020 through feedback on the dCMR.

			Quantity of trail			Quantity of	transhipments b	y location of	transhipmen	t (Mt)	
Reporting CCM	Vessel type		Catches in WCPFC area	Catches outside of WCPFC area	total	WCPFC: in archipelagic & territorial sea	WCPFC: In port	WCPFC: EEZ	WCPFC: high seas	Outside WCPFC: in port	Outside WCPFC : at sea
Australia	LL	BET	3.51		3.51			3.51			
Australia	LL	YFT	2.02		2.02			2.02			
Australia	LL	ALB									
Australia	LL	ОТН	1.63		1.63			1.63			
European Union	LL	SHK									
China	LL	ALB			6,875		71	5,749			1,037
FSM	LL	ALB	2.07		2.07		2.07				
Fiji	LL	ALB	2.25		2.25	2.25					
Kiribati	LL	ALB	46.700		46.700		46.700				
Korea	LL	ALB			1356.054						
Solomon Is	LL	ALB	792.003		792.003	746.7109	45.2921				
Chinese Taipei	LL	ALB			7646	97		7,549			
China	LL	BET			6,339			33	6,096		210
FSM	LL	BET	24.99		24.99		6.79		18.2		
Japan	LL	BET			187						
Kiribati	LL	BET	457.200		457.200		457.200				
Korea	LL	BET			8,357.475						

_

¹⁵ Includes data from 2019 Annual Report Part 1 covering 2019 activities for transhipment reports where the reported information fit into the above template. Some other CCMs not listed above may have provided a partial report in 2020 Annual Report Part 1, but this was not able to be included in the above table owing to data gaps, designation of confidential data or the use of a format that doesn't transfer easily into the above template (e.g. gear types were combined or not specified).

			Quantity of traillocation of catcle			Quantity of	transhipments b	y location of	transhipmen	t (Mt)	
Reporting CCM	Vessel type		Catches in WCPFC area	Catches outside of WCPFC area	total	WCPFC: in archipelagic & territorial sea	WCPFC: In port	WCPFC: EEZ	WCPFC: high seas	Outside WCPFC: in port	Outside WCPFC : at sea
PNG	LL	BET									
Solomon Is	LL	BET	317.1061		317.1061	312.5443	4.5618				
Chinese Taipei	LL	BET			7,168		470		5923		775
Vanuatu	LL						12,016.764		29,651.064		27,254.198
China	LL	BUM			183				174		9
Chinese Taipei	LL	BUM			1,250		6		1,137		107
Korea	LL	BUM			893.252						
China	LL	MLS	178	3	181			1	177		3
Korea	LL	MLS			41.924						
Chinese Taipei	LL	MLS					3		172		19
China	LL	OTH			3,028.842						
Fiji	LL	ОТН	0.09		0.09	0.09					
FIJI	LL	DOL	.01		.01	.01					
FIJI	LL	WAH	.01		.01	.01					
Japan	LL	ОТН			36						
Korea	LL	ОТН			348.769						
Chinese Taipei	LL	ОТН			3,311		358	2,616			337
Chinese Taipei	LL	SHK			1,388		72	1,168			148
Fiji	LL	SKJ									
Kiribati	LL	SKJ	3.157		3.157		3.157				
Korea	LL	SKJ			107.420						
PNG	LL	SKJ									

			Quantity of trai			Quantity of	transhipments b	y location of	transhipmen	t (Mt)	
Reporting CCM	Vessel type		Catches in WCPFC area	Catches outside of WCPFC area	total	WCPFC: in archipelagic & territorial sea	WCPFC: In port	WCPFC: EEZ	WCPFC: high seas	Outside WCPFC: in port	Outside WCPFC : at sea
Solomon Is	LL	SKJ	30.5127		30.5127	.9017	29.611				
Chinese Taipei	LL	SKJ					3	145			144
EU	LL/PS	SWO									
China	LL	SWO	821	29	870		6	815			29
Japan	LL	SWO			5						
Korea	LL	SWO			446.264						
Chinese Taipei	LL	SWO					42	1,113			144
China	LL	YFT	2,101	119	2,220			20	2081		119
FSM	LL	YFT	37.7		37.37		11.6		26.1		
Fiji	LL	YFT	3.31		3.31	3.31					
Japan	LL	YFT			21						
Kiribati	LL	YFT	421.520		421.520		421.520				
Korea	LL	YFT			6,765.222						
PNG	LL	YFT									
Solomon Is	LL	YFT	998.7599		998.7599	969.3945	29.3654				
Chinese Taipei	LL	YFT					2373	6136			175

Table 8C: Summary of CCM reporting of the quantity of fish from annual transhipments offloaded from purse seine vessels as reported in Annual Report Part 1 2020

covering the 2019 calendar year ¹⁶ based on reports submitted to WCPFC as at August 2020. Note may not include CCM replies in 2020 through dCMR.

Reporting CCM	Vessel type		Quantity of trail location of catch		Total (Mt)	Quantity of t	ranshipmen	ts by location	n of transhipmer	
			Catches in WCPFC area	Catches outside of WCPFC area	Total (WIt)	WCPFC: In port	WCPFC: EEZ	WCPFC: high seas	Outside WCPFC:in port	Outside WCPFC:at sea
European Union	PS	BET								
El Salvador	PS	BET								
FSM	PS	BET	1424		1424	539	83	802		
Kiribati	PS	BET	1688		1688	1688				
Korea	PS	BET			3,548.300					
Nauru	PS	BET	117		117	117				
New Zealand	PS	BET								
Philippines	PS	BET	276		276	276				
PNG	PS	BET	517.27		517.27	517.27				
RMI	PS	BET	287		287	287				
Solomon Is	PS	BET	191.5		191.5	191.5				
Chinese Taipei	PS	BET	2,242		2,242	2,242				
Tuvalu	PS	BET	7		7	7				
USA	PS	BET	1,117		1,117	1,117				
European Union	PS	SKJ								
El Salvador	PS	SKJ								
FSM	PS	SKJ	85,501.3		85,501.3	24,449.4	4838.5	56,213.4		
Korea	PS	SKJ	272,804.500		272,804.500	272,804.500				
Nauru	PS	SKJ	19,694		19,694	19,694				

¹⁶ Includes data from 2020 Annual Report Part 1 covering 2019 activities for transhipment reports where the reported information fit into the above template. Some other CCMs not listed above may have provided a partial report in 2020 Annual Report Part 1, but this was not able to be included in the above table owing to data gaps, designation of confidential data or the use of a format that doesn't transfer easily into the above template (eg gear types were combined or not specified).

Reporting CCM	Vessel type		Quantity of trai			Quantity of	transhipmen	ts by location	n of transhipmer	at (Mt)
	37 P		Catches in WCPFC area	Catches outside of WCPFC area	Total (Mt)	WCPFC: In port	WCPFC: EEZ	WCPFC: high seas	Outside WCPFC:in port	Outside WCPFC:at sea
New Zealand	PS	SKJ	942.2		942.2	942.2				
Philippines	PS	SKJ	61,998		61,998	61,998				
PNG	PS	SKJ	131,623.45		131,623.45	131,623.45				
RMI	PS	SKJ	75,874		75,874	75,874				
Solomon Is	PS	SKJ	40,487.36		40,487.36	40,487.36				
Chinese Taipei	PS	SKJ	187,892		187,892	187,892				
Tuvalu	PS	SKJ	7,015		7,015	7,015				
USA	PS	SKJ	87,377		87,377	87,377				
European Union	PS	YFT								
El Salvador	PS	YFT								
FSM	PS	YFT	13,702.2		13,702.2	4,905	668.5	8,128.7		
Kiribati	PS	YFT	10,849		10,849	10,849				
Korea	PS	YFT			30,531.500					
New Zealand	PS	YFT	10.1		10.1	10.1				
Philippines	PS	YFT	29,659		29,659	29,659				
PNG	PS	YFT	44,044.24		44,044.24	44,044.24				
RMI	PS	YFT	8,152		8,152	8,152				
Solomon Is	PS	YFT	14,060.09		14,060.09	14,060.09				
Chinese Taipei	PS	YFT	26,179		26,179	26,179				
Tuvalu	PS	YFT	237		237	237				
USA	PS	YFT	14,289		14,289	14,289				
Chinese Taipei	PS	ALB	1		1	1				
Philippines	PS	ALB	1		1	1				
Kiribati	PS	ОТН	8,022		8,022	8,022				

Reporting	Vessel		Quantity of tran	shipments by		Quantity of transhipments by location of transhipment (Mt)						
CCM	type		location of catch	es (Mt)	Total (Mt)							
			Catches in WCPFC area	Catches outside of WCPFC area	Total (Mt)	WCPFC: In port	WCPFC: EEZ	WCPFC: high seas	Outside WCPFC:in port	Outside WCPFC:at sea		
Philippines	PS	ОТН	65		65	65						

Table 8D: Summary of CCM reporting of the quantity of fish in annual transhipments received by carriers as reported in 2020 Annual Report Part 1 covering the 2019 calendar year¹⁷ based on reports submitted to WCPFC as at August 2020. Note may not include CCM replies in 2020 through dCMR.

Reporting CCM	Vessel type			Quantity of transhipments by location of catches (Mt)		Quantity of tr	ranshipment	s by location o	Quantity of transhipments by location of transhipment (Mt)						
			Catches in WCPFC area	Catches outside of WCPFC area	total	WCPFC: In port	WCPFC : EEZ	WCPFC: high seas	Outside WCPFC:in port	Outside WCPFC:at sea					
China	Carrier	BET	571	1	572			534		38					
China	Carrier	YFT	435	7	452			388		54					
China	Carrier	SWO	40	3	43			40		3					
China	Carrier	MLS	32		32			31		1					
China	Carrier	ALB	4425	182	4,607			3,676		931					
China	Carrier	ОТН	468	20	488			393		95					
Kiribati	carrier	SKJ	11,438		11,438	11,438									
Kiribati	carrier	YFT	489		489	489									
Kiribati	carrier	BET													
Kiribati	carrier	ОТН													
Korea	carrier	ALB			1,878.878										
Korea	carrier	BET			11,892.582										
Korea	carrier	BUM			706.783										

_

¹⁷ Includes data from 2020 Annual Report Part 1 covering 2019 activities for transhipment reports where the reported information fit into the above template. Some CCMs including those not listed above may have provided a partial report in 2020 Annual Report Part 1, but this was not able to be included in the above table owing to data gaps, designation of confidential data or the use of a format that doesn't transfer easily into the above template (eg gear types were combined or not specified).

Reporting CCM	Vessel type		Quantity of transhipmer location of c			Quantity of tr	ranshipment	ts by location o	f transhipment	(Mt)
			Catches in WCPFC area	Catches outside of WCPFC area	total	WCPFC: In port	WCPFC : EEZ	WCPFC: high seas	Outside WCPFC:in port	Outside WCPFC:at sea
Korea	carrier	MLS			67.118					
Korea	carrier	ОТН			5,173.716					
Korea	carrier	SKJ			259,432.645					
Korea	carrier	SWO			779.759					
Korea	carrier	YFT			43,035.949					
LR	carrier	BET			5,310,584			5,310,584		
LR	Carrier	YFT			2,661,129			2,661,129		
LR	Carrier	SWO			448,210			448,210		
LR	Carrier	MLS			42,397			42,397		
LR	Carrier	BUM			92,436			92,436		
LR	Carrier	ALB			328,486			328,486		
LR	Carrier	SKJ			22,613			22,613		
LR	Carrier	OTH			63,821			63,821		
Panama	Carrier	ALB	10,657		10,657	1,109		9,548		
Panama	Carrier	BET	14,926		14,926	4,730		10,196		
Panama	Carrier	BUM	9,168		9,168	148		9,020		
Panama	Carrier	MLS	5,214		5,214	2,876		2,338		
Panama	Carrier	SKJ	662,076		622,076	614,076		48,000		
Panama	Carrier	SWO	14,117		14,177	9,168		4949		
Panama	Carrier	YFT	133,732		133,732	81,783		51,949		
Panama	Carrier	OTH	91,475		91,475	8,895		82,580		
Chinese Taipei	Carrier	BET				320		1,090		1
Chinese Taipei	Carrier	ALB				94		2,642		34

Reporting CCM	Vessel type		Quantity of transhipmen			Quantity of tr	anshipment	s by location of	transhipment ((Mt)
			Catches in WCPFC area	Catches outside of WCPFC area	total	WCPFC: In port	WCPFC : EEZ	WCPFC: high seas	Outside WCPFC:in port	Outside WCPFC:at sea
Chinese Taipei	Carrier	YFT				1,819		3,460		1
Chinese Taipei	Carrier	SKJ				3		78		
Chinese Taipei	Carrier	SWO				40		155		19
Chinese Taipei	Carrier	BUM				200		821		84
Chinese Taipei	Carrier	MLS				3		45		5
Chinese Taipei	Carrier	SHK				72		623		130
Chinese Taipei	Carrier	ОТН				357		1,503		185
Philippine s	Carrier	SKJ	56,217		56,217	56,217				
Philippine s	Carrier	YFT	25,067		25,067	25,067				
Philippine s	Carrier	BET	249		249	249				
Philippine s	Carrier	ОТН	57		57	57				

ANNEX 5

Result of the assessment of the Transhipment CMM (2009-006) under the CMS over the years after Commission review

