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منظمة
الغذية والزراعة
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COMMITTEE ON FISHERIES

Thirty-fourth Session

Rome, 13-17 July 2020

MINUTES OF THE THIRD MEETING OF THE JOINT TASK FORCE FOR INVESTIGATION OF THE PROPOSAL TO ESTABLISH A NEW SUB-COMMITTEE ON FISHERIES MANAGEMENT (JTF 3)

Executive Summary

This background document provides the background information for COFI/2020/10, PROPOSAL FOR A NEW SUB-COMMITTEE ON FISHERIES MANAGEMENT.

**Minutes of the 3rd Meeting of the Joint Task Force for Investigation of the Proposal to
Establish a New Sub-Committee on Fisheries Management (JTF 3)**

10:07-11:45 and 14:09-14:50, Monday, 23 September 2019, in India Room (A327)

Present: Annex 1

Discussion:

1. Adoption of the Provisional Agenda

The draft provisional agenda was adopted, as attached in **Annex 2**.

2. Introduction of the relevant documents by the Secretariat

Professor Trond Bjorndal introduced the new Non-Paper (**Annex 3**).

3. Discussion and conclusion for preparing the COFI 34 paper

(1) The Representative of Japan distribute the paper indicating the possible re-allocation of the Agenda items of the Sub-Committee on Fish Trade (SCFT) (**Annex 4**), and introduced the proposal according to the instructions by his Capital. He mentioned that the Capital considered to streamline the Agenda items of COFI and the subcommittees and pointed out that the current Agenda items for SCFT could be duplicated with those for the Committee on Fisheries (COFI) and the Sub-Committee on Aquaculture (SCA) and it should be adjusted in order to address appropriate matters at an appropriate arena. He mentioned that SCFT had been utilized as “mini-COFI” previously to discuss everything related to fisheries prior to COFI. However, the situation had been changed a lot after the establishment of SCA, where SCFT had to streamline its Agenda items and in consequence issues relating capture fisheries had lost the venue for in-depth discussion. He then proposed to establish the sub-committee on fisheries by reforming SCFT, and maintain SCA, which is namely Option 3 in the Non-Paper. He mentioned that their biggest obstacle was the limit of human resources to participate in three sub-committees. The Representative of Norway appreciated the new Non-Paper and expressed that the primary position is to establish the new subcommittee, but also understood the concern about the additional cost for FAO and Members and expressed the great interest in the Japanese proposal. She then proposed, as another alternative, to shorten the meetings of SCA and SCFT and discuss capture fisheries, in particular after the meeting of SCFT. The Representative of Iceland mentioned that Iceland initially had supported the proposal made by the Representative of Norway, but he emphasized that the most important thing is to keep the momentum to discuss capture fisheries and secure some structure to guarantee the importance of capture fisheries. He then expressed his interest in the proposal made by the Representative of Japan and mentioned

that the government was now comfortable with the back-to-back discussing on fish trade and capture fisheries and it did not matter under what kinds of format, either in the same subcommittee or in two subcommittees. The Representative of Chile expressed her support for Japan and proposed to keep two subcommittees and conduct a deep analysis on Agenda items of SCFT and the new subcommittee on capture fisheries and aquaculture.

(2) The Representative of New Zealand expressed that he, on behalf of the Southwest Pacific Region, had many comments on and the different opinions from those expressed in the new Non-Paper, but understood that the technical consultation on capture fisheries prior to or in parallel with COFI could be not viable options, but still considered that it should be conducted in a back-to-back manner with COFI because the experts coming to COFI could be ready for discussing capture fisheries. The comments on the new Non-Paper, provided by the Representative of New Zealand after the meeting, is attached in **Annex 5**.

(3) The Secretariat explained the process of the Regional Fishery Body Secretariats Network (RSN), which organizes its meetings back-to-back with COFI. The Representative of Japan expressed that Japan financially supported RSN because RSN can serve as a platform for RFBs to exchange their views and coordinate their positions at COFI. He mentioned that Japan proposed that reformation of SCFT to the subcommittee on capture fisheries because many of the capture fisheries issues have been addressed through instruments relating to international trade and therefore capture fisheries and trade can't be separated. Other trade issues, such as a safety standards, could be addressed in SCA. He mentioned that such in-depth analysis is required.

(4) The Representative of Europe Union (EU) stressed the importance of the issue. He referred to the mandate given by COFI to develop a proposal for a new-subcommittee. He pointed out that the new Non-Paper clearly sets the situation of COFI, faced with the increasing challenges related to the fisheries management and with the need for a more robust technical preparation of its meetings in this regard. Based on the non-paper, the option of establishing a new sub-committee seems to be rational and deserves further consideration, pending to avoiding duplication and overlapping and controlling costs. He also mentioned that he was not opposed to reviewing the mandate of other subcommittees to improve efficiency, while being careful to focus on the objective defined by COFI and not to open a Pandora's Box. He acknowledged the difficulties for delegations to participate in additional sub-committee meetings and referred to the lines of thought described in the non-paper for mitigating this risk, including the idea of a trust fund for participation of developing countries. He noted that the relation to and involvement of RFMOs should be further considered, and underscored the importance for COFI to carry out an analysis of the options in relation to what we would like to achieve.

The representative of Chile said that we should review the COFI and structure of existing subcommittees despite opening the Pandora's Box, in the context of the efforts which our countries were making in the framework of the United Nations in order to have more efficient and effective multilateral agencies by avoiding duplication of work. She also noted that for countries with middle- or upper-middle income would be difficult to follow new subcommittee

meetings even though funds are made available, as these funds would be directed only to the least developed countries.

(5) The Representative of the United States of America (USA) mentioned that COFI should address all fisheries issues in a comprehensive manner, and strongly supported the idea to evaluate what COFI was currently doing and what we really wanted to achieve in the COFI process. Due to the time constraint, she also proposed to wrap up what we had discussed so far, rather than trying to decide two or three subcommittees, for discussion by the next session of COFI.

(6) The Representative of Norway stressed that we did not have any consensus and needed more time to consultation and therefore should not end our discussion too fast. The Representative of EU recalled COFI's request. Options are on the table to allow COFI to decide on how to continue the discussion and according to which calendar. The Representative of Chile also preferred to a broader discussion at COFI. The Representative of New Zealand proposed to summarize what we have agreed without taking a firm position and the process moving forward. The Representative of Japan also supported to cover all divergent ideas to be discussed by COFI and to start an evaluation of the COFI process after the next COFI, but who will evaluate what and how should be very important. The Representative of Iceland asked the clarification if we are going to propose to review the COFI and sub-committees. The Representative of EU expressed that the mandate given by the COFI already resulted from an assessment of the COFI process and challenges, which should be the point of departure of the follow-up to the request to develop a proposal. This follow-up should include consideration for avoiding overlapping with the existing subcommittees. The Representative of USA also clarified that she did not propose a formal evaluation or an overhaul of the COFI, but to seek some thoughtful inputs and analysis on what the core function of COFI is. It was agreed that there was no consensus on the option and therefore to propose the next COFI to continue the consultation process, including the review of the current COFI process in more transparent manner rather than consultation with the Bureau toward the 35th Session of COFI in 2022.

(7) In the afternoon session the meeting reviewed the draft "proposal" preliminary prepared by the Secretariat. It was agreed that the Secretariat would circulate the revised proposal for the comments by the participants.

4. Next meeting

It was agreed to leave the next Bureau Meeting (BM 4) to decide if the next meeting of JTF is necessary and when, if necessary.

5. Any other matters

No discussion was made under this agenda item.

(ANNEX 1)

**List of Participants in the 3rd Meeting of the Joint Task Force Meeting for Investigation of
Proposal to Establish a New Sub-Committee on Fisheries Management (JTF 3)**

23 September 2019
India Room (A327)

Canada: Ms Jennifer Fellows, Mr Michael Sarty (by SKYPE)

Chile: Ms Tamara Villanueva, Ms Karin Mundnich and Ms Katherine Bernal (by SKYPE)

Iceland/EU: Mr Stefán Jón Hafstein, Mr Marc Richir, Ms Victoria Zicos

Japan: Mr Naohito Okazoe

Netherlands: Ms Lisa Teulings, Ms Marilique Nijmeijer

New Zealand: Mr Don Syme

Norway: Ms Ann Kristin Westberg

Sweden: Ms Clara Axblad

United States of America: Ms Sandrine Goffard

Secretariat

Professor Trond Bjorndal

Mr Audun Lem, Mr Marcio CastroDeSouza (Secretary of the Sub-Committee on Fish Trade), Mr Piero Mannini, Mr Marcelo Vasconcellos, Mr Joseph Zelasney, Hiromoto Watanabe (Secretary of COFI)

(ANNEX 2)

**Provisional Agenda for the 3rd Joint Task Force Meeting for Investigation of Proposal to
Establish a New Sub-Committee**

10:00-12:00 and 14:00-16:00 (or later if required), Monday, 23 September 2019
in India Room (A327)

1. Adoption of the Provisional Agenda
2. Introduction of the relevant documents by the Secretariat
3. Discussion and conclusion for preparing the COFI 34 paper
4. Next meeting
5. Any other matters

**EVALUATION
OF PROPOSAL TO ESTABLISH
A SUB-COMMITTEE ON CAPTURE FISHERIES (SCCF)**

1. We have firstly reviewed the questions raised in JTF1, JTF2, BM3 and IM2, as well as the additional questions submitted, and found that the additional questions submitted by the representative of New Zealand could cover all questions in a comprehensive manner. Those questions are:

- Further clarity on the role and scope of the new subcommittee.
- Relationship with Regional Fisheries Management Organisations (RFMOs).
- Further analysis required for each option against the criteria for creation of new statutory bodies.
- Further analysis is required on the problems with the existing COFI meeting (and solutions to address these as a first step).
- Costs.

2. We then asked Professor Trond Bjorndal, who was the consultant in charge of the Fisheries and Aquaculture Department when the Independent External Evaluation of FAO was conducted in 2007, to make this report.

3. This report is organised as follows. First, the current status of COFI and the existing sub-committees is reviewed. Then the proposal to establish a new Sub-committee on Capture Fisheries (SCCF) and its relationship with COFI and the other sub-committees will be examined. Then, the other options, “status quo” and rearranging the two existing sub-committees, will be considered. Finally, recommendations will be presented. There are three appendices to the report. First, the proposed Terms of Reference (ToRs) for the SCCF. Second, information about participation at COFI and sub-committee meetings as well as the costs of arranging such meetings. Third, the ToRs for the two existing sub-committees. All factual information provided in the report and the appendices has been provided by the FAO, unless otherwise stated.

CURRENT STATUS OF COFI AND THE EXISTING TWO SUB-COMMITTEES

The expected role of COFI and the current status

4. Capture fisheries are one of the central themes in the mandate of the FAO. COFI is considered the most important international forum at the global level for policy debate and the adoption of policy instruments in the fisheries and aquaculture sector. However, fisheries issues now feature on the agenda of numerous international organisations including NGOs where policy is developed. Increased attention to fisheries is in itself positive. Nevertheless, it also means that COFI's role, as the main platform for developing global normative instruments, must be strengthened. COFI needs to emphasise fisheries and aquaculture management at the global level. In this report it will be considered if improved technical discussion in a new sub-committee could add more value to COFI in this regard.

5. Attendance at COFI meetings has increased quite considerably over time, with 725 participants registered at the 2018 meeting (see appendix 2). Likewise, the number of observers has increased, more or less in proportion with the increase in participation. The number of countries represented is typically between 110-120, with some variation from year to year.

6. The number of minister level participants¹ varies considerably: from 15 in 2012, to 23 in 2014, to 24 in 2016, then down to 16 in 2018. When looking at the participation over the period 2001-18, no particular pattern can be observed. Nevertheless, it appears likely that attendance depends on the agenda of COFI.

7. If we look at the 10 largest capture fishery producers and the 10 largest aquaculture producers in the world², in 2018, at COFI 33, at the ministerial level, only one of these countries was represented at the ministerial level (Peru), while in 2016, at COFI 32, two countries participated (Peru: capture; Indonesia: capture and aquaculture). In other words, at the ministerial level representation by the most important producers in the world is very limited. Moreover, important fisheries and aquaculture regions of the world have no or very little attendance at the highest level. For COFI to be truly agenda setting at globally, it would be desirable with considerably greater representation at the ministerial level.

¹ Includes ministers, vice-ministers and undersecretaries from the capitals.

² Measured by production in weight, see SOFIA (2018).

8. The terms of reference of COFI can be summarised as follows:

- to review and implement the FAO work programmes in the field of fisheries;
- to conduct periodic general reviews of international fishery problems and examine possible solutions; and
- to review specific matters relating to fisheries and to make recommendations as appropriate.

9. Fisheries management is faced with more complicated challenges today than what used to be the case. There is therefore a need to enhance COFI's discussions on capture fisheries, and a new subcommittee on capture fisheries is one way to address this issue. As there is currently no such committee, technical discussions have to be undertaken by COFI itself. The creation of SCCF for technical discussions could enable COFI to focus on strategic considerations. Another important aspect of a new subcommittee is that it will provide a forum to address Small-scale Fisheries (SSF) related issues and implementation of the SSF guidelines.

10. COFI is supposed to be driven by policy and high level discussions on issues already explored at the technical level by subcommittees. This is also the case for trade and aquaculture, but not for capture fisheries. Taking into consideration that several member countries support strengthening ocean and inland water governance, a dedicated fisheries body would be an important discussion forum. In depth discussion at the subcommittee level could enhance the high level policy discussion at COFI. Utilising COFI for technical debate has the consequence of diminishing its policy-oriented and high-level discussion profile. This could be a factor affecting the level of ministerial attendance, as discussed above.

The Sub-Committees on Aquaculture and Fish Trade

11. COFI has two sub-committees³ – the Sub-Committee on Fish Trade (SCFT)⁴ and the Sub-Committee on Aquaculture (SCA)⁵ established in 1985 and 2001 respectively, in accordance with Rule XXX.10 of the General Rules of the Organisation and Rule VII of the COFI Rules of Procedure.

³ In FAO, there are other committees with larger number of subsidiary bodies - for example, the Committee on Commodity Problems (CCP) has 10 subsidiary bodies established Rule XXIX.10 of the General Rules of the Organisation and Rule VII of the CCP Rules of Procedure – Available at <http://www.fao.org/unfao/govbodies/gsbhome/ccp/en>

⁴ Available at <http://www.fao.org/unfao/govbodies/gsb-subject-matter/statutory-bodies-details/en/c/104/>

⁵ Available at <http://www.fao.org/unfao/govbodies/gsb-subject-matter/statutory-bodies-details/en/c/333/>

12. The current two sub-committees on aquaculture and fish trade have specific mandates and terms of reference. Taking into consideration the horizontal aspects of international trade, SCFT covers technical and economic aspects applicable to both aquaculture and capture fisheries. It is sensible to discuss fish trade in one committee, as the focus is on trade, with both capture and farmed fish traded in the same markets. SCA embodies technical and policy matters related to aquaculture. In many ways, SCCF would be parallel to SCA.

13. The subcommittees have the following common objectives in their terms of reference, applicable to fish trade and aquaculture, which stress their technical profile:

- to identify and discuss major issues and trends
- to perform periodic reviews, analysis and produce outlooks;
- to promote discussion of specific problems and possible solutions, based on special studies;
- to discuss suitable measures to promote related activities, particularly to improve the participation of developing countries;
- to recommend international actions to address specific issues;
- to promote harmonisation and endorsement of policies and actions, as appropriate; and
- to advise on the strengthening of international collaboration to assist developing countries.

The terms of reference are given in appendix 3.

14. For sub-committees to have legitimacy, a certain level of representation is required. On the whole, both sub-committees are typically attended by more than 50 countries (appendix 2). The issue of legitimacy of the sub-committees has not appeared hitherto. This is also because any Member, who did not attend the sub-committees, can raise concerns, if any, on the outcome of the sub-committees at COFI. Accordingly, absence does not mean consent. The reports of the sub-committees must be endorsed by consensus at COFI.

OPTION I: PROPOSAL TO ESTABLISH A SUB-COMMITTEE ON CAPTURE FISHERIES (SCCF)

The role and scope of COFI and the new subcommittee

15. The creation of SCCF for technical discussions could enable COFI to focus on more political and strategic considerations. Another important aspect of a new subcommittee is that it will provide a forum to address Small-scale Fisheries (SSF) related issues and implementation of the SSF guidelines.

16. The agenda of COFI usually has three components:

- Procedural items: the formal opening, adoption of the agenda and arrangements, designation of drafting committee and election of the COFI Bureau for the next session, date and place for the next session and adoption of the Report;
- Standing items: the status of world fisheries and aquaculture, the progress in the implementation of the Code of Conduct for Responsible Fisheries (the Code) and related instruments, the adoption of the reports of the two sub-committees, the presentation of the Departmental programme work and budget for the upcoming biennium as well as Multi-year Programme of Work (MYPOW); and
- Issues: in the past sessions, a number of issues were treated in COFI, including Illegal, Unreported and Unregulated (IUU) Fishing, SSF and global and regional processes in the field of fisheries and aquaculture. Cross-cutting issues such as climate change, biodiversity, nutrition and the 2030 Agenda for Sustainable Development have also being focussed on.

17. The new sub-committee could cover issues which are not covered by the existing two sub-committees. These include IUU Fishing, SSF and global and regional processes in the fields of capture fisheries. In addition, the implementation of the Code and related instruments in the domain of capture fisheries could be part of its ToRs.

18. The state of world fisheries and aquaculture, the overall progress in the implementation of the Code and related instruments and cross-cutting issues such as the climate change, biodiversity, nutrition and the 2030 Agenda for Sustainable Development would be more appropriate to be addressed continuously at COFI because those issues may cover all aspects of fisheries and aquaculture.

19. It has been observed that the current agenda for COFI is too extensive so that the meetings have been stretched to the maximum including unavoidable evening sessions. In particular,

increased attention to cross-cutting issues imposes more pressure on COFI which implies that less time is available for fisheries related matters.

20. The discussions of the two existing sub-committees definitely contribute to the quality of the discussion at COFI. If there is no controversial issue at the sub-committee level, COFI can simply endorse their reports which saves considerable time. If there are any issues such as a new instrument, which should be discussed at COFI, the sub-committees can call this to the attention of COFI in a separate document, prepared in addition to the reports. This could be an effective way to sort out the most essential agenda items for COFI from those of the sub-committees and also improve COFI meetings in terms of efficiency of discussion.

21. Thus, if and when the new sub-committee is established, those issues covered by the new sub-committee should first be discussed at the technical level and subsequently be reported to COFI, with the relevant COFI document identifying any issues to be addressed also at COFI. If there are no such issues, the report of the sub-committee is simply endorsed by COFI without reopening the technical discussion already made at the subcommittee level. This would free up time for more political discussion at COFI, as compared to the current situation.

Rationale behind the establishment of SCCF

22. Meeting every second year like the other sub-committees, the SCCF would provide members with the opportunity to address detailed and technical issues more in depth. This would not only free up time at COFI and thereby allow COFI to focus the discussions on overall policy developments and principal matters but also, for many issues discussed by COFI, they would have their deliberations on a sounder “foundation” in terms of technical background. This would contribute to a more efficient use of COFI and allow FAO to maintain and even enhance its role as the leading global arena when fish is the topic of discussion.

23. The current COFI meetings are not well suited for in-depth, technical discussions. The experience from SCA and SCFT is that they have provided an opportunity to address technical issues more in depth, as well as freeing up time in COFI to discuss policy issues. Establishing SCCF will emulate the model of SCA and SCFT. In addition to providing COFI with the means and ability to focus on policy issues, the call for a separate sub-committee for capture fisheries, including SSF, can be incorporated by addressing SSF on a regular basis. Therefore, the creation of

SCCF could improve balance and provide more time for in-depth discussions and deliberations regarding capture fisheries.

24. The SCCF will make FAO and COFI more significant internationally as the ability of COFI to give guidance on current international issues will be enhanced. The SCCF should work like SCA, with the possibility of dealing with specific matters and present them to COFI separately from the ordinary subcommittee report. SCCF can address topics and advance the technical basis for discussing strategic implications at COFI.

Relationship with Regional Fisheries Management Organisations (RFMOs)

25. RFMOs, normally established on the basis of UNCLOS and the 1995 UN Fish Stocks Agreement, focus on the fisheries and stocks in specific geographical regions and are responsible for the management of relevant fisheries. Decisions to recommend management and conservation measures or set quotas have a direct impact on member countries when it comes to revenues and employment. For this reason, it is very important for the countries in each region to attend meetings of RFMOs.

26. COFI and its sub-committees, on the other hand, are expected to focus on global issues. Therefore, there is a fundamental difference in the terms of reference between them.

27. There is no formal relationship between RFMOs and the COFI process. FAO serves as secretary to the Regional Fishery Body Secretariats Network (RSN), which organises its meetings on the occasion of COFI, but the outcome of the meeting is simply reported to COFI by the chair of the RSN, who is an inter-governmental organisation observer. It should be noted that although most members of RSN are fisheries bodies, there are also a number of aquaculture organisations.

28. The COFI agenda item, global and regional ocean processes, could address any global issues generated by RFMOs, but if the new sub-committee addresses this agenda item, more substantial involvement by RFMOs in the sub-committee could be arranged in order to facilitate a formal relationship between RFMOs and the COFI process. If this is done, it would actually strengthen the relationship between RFMOs and COFI.

Terms of Reference for SCCF

29. Suggested ToRs are given in appendix 1. Specific activities and areas of work are elaborated while activities under FAO's Strategic Framework are also reflected. The committee will include a standing agenda item on SSF.

30. Taking into consideration the specificities of each subcommittee in their terms of reference, there is no potential overlap between the proposed SCCF and the current activities carried out by the other two subcommittees. The three sub-committees would be a large degree complement each other.

Costs and Meetings

31. Appendix 2 gives information about attendance at recent COFI and sub-committee meetings as well as information about budgets.

32. Essentially there are three types of costs associated with a committee meeting:

- i) Costs of arranging the meeting.
- ii) Travel costs for participants.
- iii) FAO secretariat costs.

First, costs of arranging the meeting include translation and printing, interpretation, labour, equipment, hospitality and miscellaneous. Second, travel costs for participants need to be considered. Third, secretariat costs which include manpower, however, it is part of the remit of the FAO unit to serve these committees. In addition there are travel costs for staff including interpreters when meetings are not held in Rome. In terms of preparing required documentation, additional costs to the FAO from a new sub-committee are expected to be modest (costs incurred if meetings are held in Rome are considered below).

33. i) and ii) are incurred regardless of where the meetings are held, however, who bears the cost depends on venue. The cost of arranging COFI meetings in Rome i) are met by the FAO, while subcommittee meetings are paid for by the host country. Travel costs for participants are in principle the responsibility of participants, however, host countries for subcommittee meetings generally pay travel costs for 20-25 countries. It is also customary that they pay travel costs for the FAO secretariat and the interpreters. For COFI meetings, there are no subsidies of travel costs. However, there may be savings if countries are represented by their permanent representatives in Rome.

34. As for the venue of sub-committee meetings, three options present themselves:

-Rotating between host countries.

-Rome as permanent venue.

-Rome as backup in years where no host country can be found.

35. A new subcommittee will imply that countries are invited to attend three subcommittee meetings every second year as well as COFI. In view of the importance of fisheries worldwide, it is to be expected that many countries would like to be represented at SCCF meetings. In this regard it must be noted that countries also need to attend meetings of relevant RFBs and RFMOs and, as these organisations are responsible for management of some or all of their fisheries, such meetings are given high priority. For developing countries in particular it may be difficult to attend all such meetings due to both manpower and financial constraints. With a small number of relevant experts, some countries may find it difficult to send members of staff to all meetings and may need to prioritise which meetings to attend. Thus, in some instances attending SCCF may imply that the country is not able to send representatives to some other subcommittee meetings. Financial constraints may also imply that a country cannot afford to attend all subcommittee meetings unless their travel costs are paid for.

36. It is, of course, a concern if countries cannot attend subcommittee meetings, be it for manpower or financial constraints. This concern applies to all meetings but it may be accentuated if a third subcommittee is established. It is also important that representation in the sub-committee is at a level that will give it legitimacy when its reports are presented to COFI.

37. In general, where countries cannot attend meetings, they should be encouraged to cooperate in regional groups and/or with like-minded countries so that their views can be expressed. This would be efficient both from a time perspective and from financial considerations. If unable to attend a subcommittee meeting, the country also has the opportunity to raise issues later at COFI when the sub-committee's report is presented.

38. Availability of host countries for three subcommittees could be an issue because of the financial obligations involved. In the event that there is no host country, the fallback option of FAO hosting an additional subcommittee meeting in Rome would have additional cost implications for FAO that need to be considered.

39. It has been suggested that one way to economise is to shorten the COFI and subcommittee meetings by one or two days. This is not likely to be practical. Each meeting has to deal with various fixed agenda items (see outline of COFI agenda in Paragraph 16). Towards the end of the meeting, time is needed to prepare a report that is then to be adopted on the final day of the meeting. This implies that perhaps no more than three days is available for the deliberations of the committee. It does not appear likely that this time can be reduced by much, if at all. Anyway, this would be a matter for each committee to consider. The cost savings would also be fairly marginal and would relate to hotel and per diem while travel costs would be unchanged.

40. Based on the budget information that is available (see appendix 2), the cost of hosting a SCCF meeting in a host country can be estimated at USD 350,000. This includes travel costs for the FAO secretariat, interpreters and 20-25 delegates from developing countries. If the meeting were to be held in Rome, the cost can be estimated at USD 250,000. This does *not* include travel costs for any developing country participants, nor can it be expected that the FAO will cover such costs as this would require extra-budgetary funding. These figures can only be considered rough estimates.

41. It should be noted that costs of arranging the meeting are not likely to be very different depending on location, as the main costs are translation, printing and interpretation. Host countries usually pay for the travel costs of a number of developing countries, which will not be the case if meetings are held in Rome. Meetings in Rome would also result in higher travel costs for some countries every year, relative to rotating the location every year. On the other hand, meetings in Rome give more opportunity for permanent representatives to attend, which would imply a saving on travel costs. However, these representatives may not have the expertise that representatives from the home ministry would have. This would represent a “cost” to the meeting, albeit not of a pecuniary sort.

42. As shown in appendix 2, at two recent meetings (2014 and 2016), SCFT had more than 130 participants with about 50 countries represented. For SCA, up to 2015 the number of participants was typically in the range 100-120, with on average about 50 countries represented. It is, of course, difficult to predict attendance at meetings of the proposed SCCF. Nevertheless, with the great interest there is for capture fisheries in many parts of the world, and the importance they represent for many countries, it may be anticipated that at least 50 countries will be represented with delegates numbering 100-150. Even greater participation can be envisaged. As stated before,

SCCF may have a negative impact on meetings of SCFT and SCA, although this is impossible to predict.

43. If SCCF meetings are to be organised in a rotating manner in different countries, it is, of course, a necessity that there are sufficient countries willing to host such meetings and assume the financial responsibilities involved. If the new sub-committee meetings were to be held in Rome, the cost of the meetings should be borne by the FAO in full. It may be difficult for the FAO to do so, unless extra budgetary funding is available. Even though the most of the cost including translation and interpretation is paid to other units of the FAO, it could be difficult to secure USD 250,000 on a regular basis which is why extra-budgetary funding would be necessary.

Establishment of New Subsidiary Bodies

44. COFI may establish subsidiary bodies, which may take the form of:

- subcommittees;
- subsidiary working parties; or
- study groups.

45. Regarding subcommittees, COFI may establish any additional one provided that two basic conditions are met – (1) the new subcommittee is considered necessary; and (2) necessary funds are available⁶.

46. In addition, it is important to recognise an in-force FAO policy of restricting the creation of new statutory bodies. In this regard, as directed by the Conference⁷⁸, any new Statutory Bodies, including subsidiary bodies, must:

- be flexible task-oriented;
- have time-bound working arrangements;
- be strictly necessary;
- be central to the FAO mandate and current priorities;
- have clarity of the definition of the task;
- have a positive impact at the level of FAO Members;
- avoid overlap;
- create synergy with the work of other bodies;
- have an inclusive representation of countries; and

⁶ Rule VII of the Rules of Procedures of COFI, available at <http://www.fao.org/3/K8024E/K8024E.pdf>

⁷ <http://www.fao.org/3/W7475e/W7475e0f.htm#xv> and

⁸ <http://www.fao.org/3/a-mo153e.pdf>

- have an willingness of their members to contribute financially and through non-monetary inputs.

47. The ToRs clearly set out the priorities for the committee, however, they are also flexible enough to accommodate changes over time in the fisheries “environment”, be they of institutional, environmental or other nature. The committee will meet every second year and provide important input to COFI meetings. The committee is also strictly necessary as it will enhance the quality of technical discussions as well the role of COFI in high level policy debates and decisions. It is important to observe that SCA was created after this restrictive general policy was introduced. The SCCF clearly complements the two other subcommittees; if anything, one may question why it was not established at the same time as the SCA. The SCCF will be central to the FAO mandate when it comes to fisheries management and will have an important role to play in areas such as the Code and SSF management. The tasks of the committee are clearly defined in the ToRs. More and better opportunities for technical discussion of capture fisheries will have a positive impact on FAO Members.

48. It is expected that the committee directly, and in the form of input to COFI, will have a positive impact on fisheries management that will benefit FAO Members; indeed, the quality of advice can be expected to improve due to the establishment of the committee. The way the committee is envisaged there will be no overlap with the other committees and COFI; on the contrary, as noted, one would expect improvements in the way COFI operates as a consequence of establishing SCCF.

OPTION II: STATUS QUO: TO FURTHER UTILISE THE EXISTING BODIES (COFI AND SCFT/SCA) INCLUDING PARALLEL SESSIONS DURING COFI ON TECHNICAL MATTERS, OR A TWO-DAY SESSION IMMEDIATELY PRIOR TO COFI, OR BACK-TO-BACK SESSIONS WITH THE EXISTING SUB-COMMITTEES

49. It has been suggested that one option would be to hold fisheries management technical discussions for two-three days immediately prior to COFI or, alternatively, a parallel technical session during COFI. More intensive technical discussion on capture fisheries may have a positive impact on COFI and FAO Members. If there is a separate report prepared on the basis of the session on capture fisheries which would be expected, the discussions at COFI on capture fisheries could be reduced which would free up time for policy discussions. However, one challenge to be

overcome would be how the outcome of the session on capture fisheries could be reported to COFI, if the sessions are in parallel.

50. The delegations, in particular small delegations, may have some difficulty to follow both the main sessions of COFI and the sessions on capture fisheries, if organised in parallel. A solution to this would be to prolong the meeting which, of course, would have cost implications as well present difficulties due to longer absence from home.

51. This option may sound intriguing, but in reality may not be practical. Higher level officials usually attend COFI meetings and, if anything, there is a desire to increase the number of minister level delegates at COFI. With technical discussions back to back with COFI, countries will need to send technical experts to Rome as well as higher level officials.

52. Having sessions with technical discussions prior to, or parallel with, COFI, would not give COFI time to act on proposals from such meetings, and thus not address one of the major reasons for proposing a new subcommittee, namely to improve the quality of technical discussions and lay the foundation for improved policy debates.

53. A technical session prior to or parallel with COFI would in reality imply two sets of meetings which would both require interpretation, translation and more. In addition, as one would expect technical experts to come from capital rather than permanent missions in Rome, there would be an increase in travel costs. One must also be mindful that the FAO does not have a budget to pay for developing country participants. To the extent that this leads to lower attendance, it may have a negative impact on the legitimacy of the meetings.

54. The same considerations would apply to a technical meeting back to back with a COFI meeting.

55. As for costs, a back to back meeting or a meeting parallel with COFI would require translation, interpretation and more. The costs would depend on the duration of the meeting and will probably be less than for a regular sub-committee meeting but might well be in the range USD 150-200,000. This suggests that costs savings compared to Option I would be limited. Moreover, there would be no subsidies to cover travel costs for technical experts attending the meeting.

OPTION III: TO KEEP TWO SUB-COMMITTEES, BUT REARRANGE THE TERMS OF REFERENCE

56. One suggestion has been to change SCFT to SCCF and keep the SCA, and have separate discussions of trade related issues in each subcommittee. An alternative would be to change the SCA to a Sub-Committee on Capture Fisheries and Aquaculture (SCCFA) and keep SCFT, while removing the trade related issues from the SCCFA, if any. As with option II, more intensive technical discussions on capture fisheries may have a positive impact on COFI and FAO Members. Moreover, capture fisheries could be clearly defined separately from aquaculture and fish trade. The explicit inclusion of capture fisheries would give more value, and attract more participants than the existing sub-committees. If rearrangement makes it necessary to extend the duration of the existing sub-committees, both host countries and participants may need to bear extra costs.

57. Nevertheless, it is doubtful this would be a feasible approach. If the option is to change SCFT to SCCF, technical experts on SCCF and SCA do not have expertise on trade related issues. Even if they did, it does not make sense to have separate discussions on trade for fisheries and aquaculture – after all, the products are sold in the same markets and are very close substitutes. It is therefore essential that they are considered by the same body.

58. An alternative would be to change SCA to SCCFA and keep SCFT, while removing the trade related issues from the SCCFA, if any. While the SCFT would continue operating as now, the new SCCFA may organise split sessions on fisheries and aquaculture respectively for two-three days in parallel, followed by a plenary session of the committee. Essentially this would imply that countries have to send both fisheries and aquaculture experts to the same meetings – in essence SCCFA would be composed of two subcommittees. However, the time devoted to fisheries and aquaculture technical discussions would be less than with two separate committees.

59. While there could be some savings in terms of arranging the meetings, these would be limited as both sessions would need interpretation, translation of documents etc. Moreover, the FAO would need to send additional secretariat members and interpreters. The costs to the host country might be in the range USD 150-200,000. When it comes to travel costs, the savings are also likely to be limited as two sets of experts would be expected to attend the meetings. If host countries continue paying for 20-25 participants from developing countries, an implication is that

more developing country participants will need to cover their own costs; the consequence of this might be reduced attendance which is not desirable.

RECOMMENDATIONS

60. The purpose of this report is to come up with recommendations that can improve the way COFI functions as the world leading body for fisheries and aquaculture policy as well as improve the quality of technical advice to COFI in the capture fisheries sector.

61. Three options have been considered. One is the “status quo”, to further utilise existing bodies (COFI and SCFT/SCA) including parallel sessions during COFI on technical matters or a two-day session immediately prior to COFI. Another option is to keep two sub-committees, but to rearrange the terms of reference so as to include capture fisheries. Both options may bring about improved technical discussions but are nevertheless rejected. Neither option is seen to bring benefits in terms of reduced costs.

62. It is recommended to establish a separate Sub-committee on Capture Fisheries (SCCF), parallel to the SAC, to address technical matters. It is believed that the SCCF will be a forum for thorough technical discussions, which currently does not exist in a permanent form. The SCCF will provide advice to COFI and the FAO in general, which will improve the quality of such advice. This will free up time at COFI meetings which to a greater degree can be devoted to global policy matters which will strengthen the role of COFI in this area.

63. It is further recommended that meetings are held every second year, as is the case for the other sub-committees, and are hosted on a rotating basis by FAO member countries. This is seen as preferable to hosting the meetings at HQ, in particular because host countries are also expected to cover travel costs for a number of delegates from developing countries. Should no host country be found, Rome might be considered as a backup – or the meeting would need to be cancelled.

64. There are certain advantages to hosting the meetings in Rome, in particular, there would be no travel costs for the secretariat and interpreters. This is outweighed by the fact that the FAO would not be able to subsidise participants from developing countries. Moreover, it is not obvious how the FAO would fund the meeting itself on a permanent basis out of its already constrained budget.

65. As mentioned, host countries would be expected to subsidise participation by representatives from 20-25 developing countries. It has also been suggested that a fund to support participants

from developing countries should be established. This proposal should be further looked into. It is also recommended that host countries for the first three sub-committee meetings should be identified before the first meeting of the SCCF.

66. Finally, it is recommended that the new arrangement should be evaluated after a period of time. In particular, it is suggested this is done after three meetings of the SCCF (followed by three COFI meetings), so that it should be initiated five years after the first SCCF is held. This should be sufficient time to evaluate the effectiveness of the new arrangement and to make changes, if required.

APPENDIX 1: POSSIBLE AREAS TO BE COVERED BY THE SCCF

1. In terms of alignment, the proposed SCCF will mirror the Terms of Reference of the Subcommittee on Aquaculture, since the Subcommittee on Fish Trade will continue to have its duties encompassing both aquaculture and wild capture fisheries.

2. In this regard, a possible Terms of Reference for the new SCCF could be:

The Sub-committee on Capture Fisheries shall provide for consultation and discussion on fisheries issues, advising COFI and the work to be performed by the Organisation on related technical and policy matters.

In particular, the sub-committee shall:

- identify and discuss major issues and trends in global fisheries management and development, determine those issues and trends of international importance requiring action in the domain of fisheries management, within the particular framework of food security, economic development, small-scale fisheries and poverty alleviation;

- support, assist and provide a technical forum for countries and observers engaged in fisheries management to discuss and implement measures for the long-term conservation and sustainable use of fisheries resources, within an appropriate policy, legal and institutional framework;

- recommend international action to address fisheries management and development needs and, in this regard (1) to advise on mechanisms to prepare, facilitate and implement action programmes identified, as well as on the expected contribution of partners; (2) to advise on the liaison with other relevant groups and organisations with a view to promoting harmonisation and endorsing policies and actions, as appropriate; (3) to advise on the strengthening of international collaboration to assist developing countries in the implementation of FAO instruments in the domain of fisheries management, particularly the Code of Conduct for Responsible Fisheries, and against IUU fisheries, such as the Voluntary Guidelines for Flag State Performance and PSMA;

Promote and review small-scale fisheries related matters, including the implementation of the Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries in the Context of Food Security and Poverty Eradication

- advise on the preparation of technical reviews and of issues and trends of international significance in the domain of fisheries management;

- collaborate and provide inputs to the Subcommittee on Fish Trade on issues linking fisheries management and trade; and

- address any specific matters relating to fisheries referred to it by its Members, the Committee on Fisheries or the Director-General of FAO.⁹

⁹ Rather than listing all the matters to be covered, it is proposed to keep general ToRs that is flexible and broad and develop an Appendix (similar to Appendix E of the Expert Consultation on the Sub-committee on Aquaculture), which will elaborate on specific activities and areas of work, as well as reflect activities under FAO's Strategic Framework.

APPENDIX 2. MEETINGS AND BUDGETS

1. This appendix gives information about meetings of COFI and the current sub-committees as well as budgets. All factual information presented has been provided by the FAO.

Meetings

2. Information about meetings is given in tables A2.1-3. The number of participants includes only those who were present. Preregistered delegates who did not show up, are not counted.

3. Attendance at COFI meetings has increased quite considerably over time, with 725 participants registered at the 2018 meeting. Likewise, the number of observers has increased, more or less in proportion with the increase in participants. The number of countries represented is typically between 110-120, with some variation from year to year.

4. For SCFT, the number of participants exceeded 130 in both 2014 and 2016, with about 50 countries represented. There was a fairly substantial reduction in participation at the Busan meeting in 2017. This was presumably at least partly due to the tense situation on the Korean peninsula at the time which led to some countries imposing travel restrictions.

5. For SAC, up to 2015 the number of participants was typically in the range 100-120, with a few outliers, with on average about 50 countries represented. In 2017, when the meeting was held in Rome, the number of participants reached a record of 190 from 89 countries. The 2017 SCA was meant to be held in Iran, however, the Memorandum of Understanding was not signed on time and the meeting was held in Rome which permitted participation by permanent representatives stationed there. This is one possible reason for the increase in participation. Nevertheless, it must also be noted that there is increasing interest for aquaculture worldwide that may also have an impact on participation.

Table A2.1. COFI meetings – last 10 sessions.

Year	Total no of participants	No of member countries	No of minister level participants ^{a)}	No of observers
2018	725	107	16	104
2016	642	113	24	84
2014	634	110	23	77
2012	530	120	15	70

2011	564	115	17	77
2009	523	110	9	73
2007	560	121	14	72
2005	507	129	22	67
2003	401	120	14	67
2001	406	106	7	59

a) Includes ministers, vice-ministers and undersecretaries from the capitals.

Table A2.2. Sub-committee on Fish Trade meetings – last seven sessions.

Year	Location	Total no of participants	No of member countries	No of IGOs, NGOs and specialised agencies
2017	Busan	81	34	4
2016	Agadir	134	47	15
2014	Bergen	131	53	14
2012	Hyderabad	94	40	8
2010	Buenos Aires	99	38	9
2008	Bremen	107	52	10
2006	Santiago de Compostella	157	61	20

Table A2.3. Sub-committee on Aquaculture meetings – last nine sessions

Year	Location	Total no of participants	No of member countries	No of IGOs, NGOs and specialised agencies
2019	Trondheim			
2017	Rome	190	89	17
2015	Brasilia	98	49	9
2013	St Petersburg	121	51	10
2012	Cape Town	109	47	10
2010	Phuket	149	58	6
2008	Puerto Varas	92	38	10
2006	New Delhi	103	48	9
2003	Trondheim	113	64	8
2002	Beijing	105	49	10

Budgets

6. When looking at the costs of hosting COFI meetings, it can be inferred that close to 90 percent of the costs pertain to translation, printing and interpretation (table A2.4). The costs of the last four COFI meetings have exceeded USD 500,000: around USD 530-540,000 for COFI 32, 33 and 34, with COFI 33 as an “outlier” at USD 584,000, due to higher costs for translation and printing.

7. The general cost of the host country for the SCA is in the range USD 250,000-300,000. This takes into consideration travels of both FAO staff and interpreters, interpreters' salaries and translations of all SCA documents into the five official FAO languages and local logistics. The Rome meeting was more or less the same, taking away the travel component. Travel support for developing countries is, however, *not* included.

8. As for SCFT, the budget for a meeting at HQ is estimated at USD 235,000, which increases to USD 340,000 for a meeting in a host country. The main difference is due to the fact that there will be no travel costs for FAO staff and interpreters if the meeting is held at HQ; moreover, there is no subsidy to travel costs for developing countries when the meeting is held in Rome. Depending on the geographical location of the host country, transportation costs for FAO staff, interpreters and developing country participation can be higher or lower than the example provided.

9. In the budget, support for travel costs for 20 countries is included at an average cost of USD 3,750 per person. This includes air tickets; the hotel can be included or not in the cost, depending on the arrangements with the host country; most of the meals are provided by the host country during the session and are usually not included in the cost.

10. When comparing the costs of translation and interpretation, it can be noted that these are substantially higher for COFI than for the subcommittees. The cost of translation is depends on both the number of document as well as timing of preparation. For COFI 33 in 2018, a total of 44 official documents were prepared. Some of them were late which caused higher cost for translation. In 2017, the number of documents for SCFT and SCA was 24 and 19, respectively. For this reason, the cost of translation for subcommittees is much lower than for COFI.

Table A2.4. Budget for COFI 30-33 (non-staff cost) (as of 22 Feb 19). USD.

	COFI 30	COFI 31	COFI 32	COFI 32 (Exp.)	COFI 33	COFI 33 (Exp.)
Translation	190990	191000	191000	318105	320000	
Printing	13950	14000	14000	11000	14000	380565
Interpretation	89302	148050	157500	148500	140000	140650
Overtime	16394	16500	16500	19144	20000	16366
Locally-hired staff	13073	13100	13100	21489	21500	19444

Contract	4216	4300	4300	70	5000	289
Equipments	5327	5500	5500	4976	5000	3886
Atrium	3471	5000	20000	3705	5000	10526
Miscellaneous	786	800	800	(7911?)	1000	11810
Cleaning						833
Total	337509	398250	422700	534900	531500	584369

Table A2.5. Budget for SCFT.

	Meeting at HQ	Meeting in Host Country
Red room support staff and technical support + 1 secretariat rooms with PCs and printer/photocopier	7,000	-
14 interpreters, including flights, DSA ¹ and terminals	68,000	80,000
Up to 10 FAO staff, including flights, DSA and terminals	-	23,000
Support to developing country participation - 20 countries	-	75,000
Pre-session and in-session translation costs	160,000	160,000
Post-session translations/revision and printing of final report		
Shipment of publications and misc.	na	2,000
SUB-TOTAL USD	235,000	340,000

APPENDIX 3. TERMS OF REFERENCE OF THE COFI SUBCOMMITTEES

Subcommittee on Fish Trade

1. The Sub-Committee shall provide a forum for consultations on technical and economic aspects of international trade in fish and fishery products including pertinent aspects of production and consumption. In particular, the work of the Sub-Committee will include:

- Periodic reviews on the situation and outlook of principal fishery commodity markets covering all factors influencing them;
- on the basis of special studies, discussion of specific fish trade problems and possible solutions;
- discussion of suitable measures to promote international trade in fish and fishery products and formulation of recommendations to improve the participation of developing countries in this trade, including trade-related services;
- in conjunction with the FAO/WHO Codex Alimentarius Commission, formulation of recommendations for the promotion of international quality standards and the harmonization of quality control and inspection procedures and regulations;
- consultation and formulation of recommendations for economically-viable fishery commodity development, including processing methods, the upgrading of products and production of final products in developing countries.

Subcommittee on Aquaculture

2. The Sub-Committee shall provide a forum for consultation and discussion on aquaculture and advise COFI on technical and policy matters related to aquaculture and on the work to be performed by the Organization in the subject matter field of aquaculture. In particular, the Sub-Committee shall:

- identify and discuss major issues and trends in global aquaculture development;
- determine those issues and trends of international importance requiring action to increase the sustainable contribution of aquaculture to food security, economic development and poverty alleviation;
- recommend international action to address aquaculture development needs and, in this regard (1) to advise on mechanisms to prepare, facilitate and implement action programmes

identified, as well as on the expected contribution of partners; (2) to advise on the liaison with other relevant groups and organizations with a view to promoting harmonization and endorsing policies and actions, as appropriate; (3) to advise on the strengthening of international collaboration to assist developing countries in the implementation of the Code of Conduct for Responsible Fisheries;

- advise on the preparation of technical reviews and of issues and trends of international significance; and
- address any specific matters relating to aquaculture referred to it by its Members, the Committee on Fisheries or the Director-General of FAO.

SUB-COMMITTEE ON FISH TRADE
25–29 November 2019 PROVISIONAL AGENDA

	POSSIBLE ALLOCATION
1. Opening of the Session	
2. Adoption of the Agenda, arrangements for the Session and designation of the Drafting Committee	
3. Overview of the fisheries and aquaculture sectors	→ COFI
4. FAO, the global framework and related activities	→ COFI
5. Monitoring the Implementation of Article 11 of the Code of Conduct for Responsible Fisheries (CCRF)	→ COFI
6. FAO, information on markets and trade: GLOBEFISH and the FISHINFONetwork (FIN)	→ COFI, SCCF, SCA
7. Quality and safety of fish and fishery products	→ COFI
8. Small-scale fisheries: value chains, post-harvest and trade	→ SCCF, SCA
9. Product legality and transparency from a trade perspective	→ SCCF, SCA
10. Biodiversity conservation and trade	→ COFI
11. Recent trade agreements and market access for fish and fishery products	→ COFI
12. Communication in aquaculture: impact on trade and consumption	→ SCA
13. Traceability: FAO's recent work and the future	→ SCCF, SCA
14. Social responsibility in fish value chains	→ SCCF, SCA
15. Trade in Fisheries Services	→ COFI
16. Reporting from Members and observers of relevance to the Sub-Committee	
17. Election of Chairperson and Vice-Chairpersons of the Eighteenth Session of the COFI Sub-Committee on Fish Trade	
18. Any other matters	
19. Date and place of the Eighteenth Session	
20. Adoption of the Report	

Comments provided by the Representative of New Zealand on the new Non-Paper

There is a linguistic problem with the paper as it fails to use conditional language and therefore it comes across as predetermined. This is unfortunate. It should be edited to ensure that impression is not retained in any paper that FAO puts to COFI.

1. COFI meetings are not Ministerial and therefore to judge participation by Ministerial involvement is misleading. From time to time COFI has high level sessions – including at the forthcoming COFI in 2020 – to which Ministers and senior officials will be invited. Otherwise attendees at COFI meetings are middle to senior officials. This is appropriate for the technical nature of the agenda.
2. The paper asserts that COFI should be driven by policy and high level discussions. The reality is that COFI has dealt with fisheries technical issues for all of its 32 meetings. Detailed technical work that backgrounds and briefs COFI has often arisen from workshops, expert consultations and, where appropriate technical consultations open to all members. These practices are not discussed in the paper and the impression is left that, in the absence of a “SCCF”, the only action has been through COFI meetings.
3. In recent COFI meetings the Agenda has been squeezed by “new issues”. This trend may be the new normal and therefore there is a need to make more time for the core issues that occupied COFI in the past. That could be a rationale for new sub-committee, or more time at COFI or a review of the COFI agenda as to the value/appropriateness of the new issues for presentation to COFI in a deliberative sense.
4. Average member attendance at sub-committees is asserted to average 50 members. This may be a generous view of the history of both SCFT and SCA. Looking back on the record, attendance appears to be influenced by venue and meetings held in Rome appear to be better attended, presumably because there are Permanent Representatives in Rome.
5. An important point is that, on average, half the attendees at any of the two current SCs are funded by the hosts. The “major” developed countries reliably attend, and it suggests that attendance by medium sized countries is indeed poor and highly variable compared to their attendance at COFI. There is no evidence that a new SCCF will be any better attended.
6. It is not clear from the paper how the 20 to 25 developing country delegates funded by the host are selected and what expectations are placed on them to represent a regional view in addition to a national view.

7. The record of attendance is a matter worthy of separate consideration. Par 37 suggests cooperation among members to assist members unable to attend to have their views presented by on their behalf and notes that no issue considered by SCs is considered as final until endorsed or noted at COFI. There are exceptions to this practice, where COFI explicitly provides a mandate to a SC finalise a matter without reference back to the next COFI.

8. The proposed role of a SCCF to be a forum for small scale fisheries is likely to be popular with developing country members. However, attendance to take up that opportunity will still continue to be a challenge – as already noted.

9. Par 52 discussing associating a SCCF with COFI meetings has the sequence wrong. The subcommittee would be better held immediately after COFI with an intersessional process as you note. Your comments on paragraph 55 are also correct. It is possible that the costs of a sub-committee held in Rome are still not being fully reflected in the paper and FAO, in any case, would still need to seek extra-budgetary funding to host a sub-committee.

In summary, there is little that is new in the non-paper and some ideas previously discussed are not well canvassed when they run counter to the proposal for a new subcommittee.