



**TECHNICAL AND COMPLIANCE COMMITTEE**  
**Nineteenth Regular Session**  
20 – 26 September 2023  
Pohnpei, Federated States of Micronesia

---

**AVAILABLE DATA FOR VERIFYING COMPLIANCE IN THE  
COMPLIANCE MONITORING SCHEME**

---

**WCPFC-TCC19-2023-11**  
**14 September 2023**

**Paper by the Secretariat**

**Purpose**

1. The purpose of this paper is to review the status of available data currently used to support compliance reviews of individual obligations in the Compliance Monitoring Scheme (CMS), and the Secretariat’s approach to evaluating compliance based on the available data. The paper also presents the Secretariat’s views on additional data sources that could strengthen WCPFC’s ability to independently verify compliance with key obligations in the future.<sup>1</sup>

**Introduction**

2. The Cambridge Dictionary defines *verify* as “to make certain or prove that something is true or accurate.” It therefore follows that if something is *independently verified* “there is no influence or control in any way by other people, events or things, when checking or proving that something is true or correct”. Within the CMS context, the Secretariat independently verifying a report implies that the evaluation processes used by the Secretariat to check whether the report content is true or accurate has a sufficient degree of separation incorporated into it. For example, data supporting the evaluations of CCM-reported information should include data from multiple sources, and some of the data should be collected through one or more monitoring programs that operate *independently* from the CCM whose compliance is being reviewed, in order to be considered as *independent verification*.

3. The recent experience of applying the adopted Audit Points when developing the 2023 draft Compliance Monitoring Report (dCMR) as well as experience gained through

---

<sup>1</sup> This paper responds to the WCPFC19 task that the Secretariat “develop a paper, which identifies those obligations for which there is a lack of independently verifiable data, as well as potential sources of data that could provide independent verification of those obligations, for review by TCC19.” (WCPFC19 Summary Report para 351(ii))

work undertaken by two analytical consultancies<sup>2</sup> has provided valuable insight to inform the Secretariat’s role in supporting compliance verification. Collectively, these areas of work have allowed for the opportunity to further consider where independent sources of information or data are not available to the Secretariat and where existing data sources are either not captured or not accessible in a form that is ready for use in assessments of individual obligations to support the preparation of the dCMR.

4. The paper is structured in three parts: verifying compliance with limits, verifying compliance with implementation obligations, and verifying transshipment activities. Annex 1 provides six reference summary tables which document the Secretariat’s approach to conducting compliance evaluations in the development of the dCMR, including the available data sources to inform those evaluations. Each table provides (from left to right) the obligation with a brief description, the adopted Audit Point definition, the available sources of data for the dCMR, and a note related to the verification approach the Secretariat used in the dCMR prepared in 2023 (covering 2022 reporting year).

List of tables in Annex 1:

Table 1. Current data sources and approach to verify compliance with purse seine days fished limits .....	13
Table 2. Current data sources and approach to verify compliance with vessel capacity limits .....	14
Table 3. Current data sources and approach to verify compliance with <i>vessels fishing for</i> -type limits .....	16
Table 4. Current data sources and approach to verify compliance with catch limits .....	17
Table 5. Current data sources and approach to verify compliance with certain implementation obligations .....	19
Table 6. Current data sources and approach to verify limits and other reporting requirements associated with transshipment activities .....	24

**Verifying limit obligations**

5. Adopted Audit Points<sup>3</sup>for limits are based on the following template language:  
*The CCM reported (where applicable in AR Pt2) its level of fishing effort / total number of vessels fishing for / total catch of {species}*  
*and the Secretariat can verify the CCM’s reported effort/ number of vessels/catch level and confirm that the CCM’s allowable limit has not been exceeded.*

6. Consequently, where a quantitative limit obligation applies to a CCM, that CCM is expected to provide an annual report confirming that the applicable quantitative limit was not exceeded, and usually this report will be submitted through the CCM’s AR Pt 2.

---

<sup>2</sup> See [TCC19-2023-18](#) *Enhanced data analysis and interpretation: Experiences and Opportunities*

<sup>3</sup> CMM 2021-03 paragraph 7 (i) states that through the Compliance Monitoring Scheme the annual assessment of compliance for limit obligations shall be determined based on the following criteria:

For a CCM-level quantitative limit or collective CCM quantitative limit, such as a limit on fishing capacity, fishing effort, or catch, verifiable data indicating that the limit has not been exceeded.

The guidance provided by Audit Points confirms that the Secretariat, when preparing the dCMR for quantitative limits, is to first verify the report provided by each CCM, and then confirm that the CCM has not exceeded the allowable limit.

7. The Commission has adopted several CMMs which prescribe limits on CCMs fishing activities. The limits can be specified in different ways:

- As a specified level of fishing effort (days, vessel numbers) that a CCM is permitted to undertake within the Convention Area or subparts thereof, and/or
- As a specified quantity of catch of a species or a stock that a CCM is permitted to catch; and/or
- As a specified limit on certain types of fishing activities, eg transshipment activities.

8. Table 1 – Table 4 presents the review of the current data sources and verification approach to different limit types. This is because the existing data sources that are available to the Secretariat to verify compliance with limits vary in coverage and scope across fisheries. In addition, different types of limits require different approaches to verify a CCM’s reported information (for example see Figure 4 and 5 in [TCC19-2023-09](#)). The available data sources together with the type of limit affects the verification approach used by the Secretariat, and the extent that the approach could be considered “independently verified”.

#### *Limits on Purse seine fishing days*

9. Most *purse seine effort limits* in the tropical tuna CMM are specified in terms of purse seine fishing days ([CMM 2021-01 24](#) and [CMM 2021-01 25](#)). The approach used by the Secretariat in the dCMR to verify compliance with the applicable purse seine fishing days limits, is based on a report that SPC regularly compiles for WCPFC which is based on operational catch and effort data, that has been verified by SPC using VMS data and observer data (Table 1).

10. Additionally, it is useful to note that there is high confidence in the report that SPC regularly compiles for WCPFC because coverage of purse seine fishery operational catch and effort data is 100% for most purse seine fleets. With a 100% purse seine observer coverage requirement, there is high coverage of observer data for the purse seine fishery and VMS data through the Pacific VMS (WCPFC VMS + FFA VMS data combined) is also has high coverage.<sup>4</sup>

11. In the list of limits presented in Table 1 there are five instances where purse seine fishery EEZ limits are solely defined as limits on catch.<sup>5</sup> The Secretariat’s verification approach uses the report that SPC prepares to check if there was some level or *nil* purse seine activity detected in the applicable year. However, where the data reflects some level

---

<sup>4</sup> For specific levels of coverage see Table 15 in [TCC19-2023-IP04](#) for purse seine operational catch and effort data, Figures 14 in [WCPFC-TCC19-2023-09](#) for purse seine observer data coverage, and [TCC19-2023-RP01](#) for information about WCPFC VMS coverage.

<sup>5</sup> Based on CMM 2021-01 Table Att 1 Table 1: Australia, French Polynesia, Indonesia, New Caledonia, New Zealand

of purse seine fishing activity, because suitable information was not available to the Secretariat when preparing the 2023 dCMR covering 2022, the Secretariat approach was based on self-reported information provided by the CCM (see Table 1). In the medium-term, it may be possible through the development of catch documentation schemes to collect additional data that will support analyses, and which will independently verify CCM-reported information in relation to compliance with purse seine catch limits.

12. For completeness there is a single instance shown in Table 1 where the limit is defined in terms of both high seas purse seine days fished and catcher vessel numbers ([CMM 2021-01 25](#)). The Secretariat used the report that SPC prepares to verify the days fished part of the limit. For the catcher vessel limit, the Secretariat separately verified compliance with the vessel limit using analyses of WCPFC VMS data, RFV data and HSP1 entry and exit reports.

13. The 2023 evaluations presented in the dCMR of obligations expressed as purse seine fishing days (whether applying to EEZ or high seas areas), were independently verified using data from multiple sources that was available to the Secretariat as a report prepared by SPC.

14. The 2023 evaluation presented in the dCMR of one CCMs purse seine with a HSP1 catcher vessel limit was independently verified using data from multiple sources that were analyzed by the Secretariat.

15. For the catch-based purse seine fishery EEZ limits, some data was available to the Secretariat to verify some, but not all, CCMs limits. The Secretariat could use data from multiple sources to verify compliance with EEZ limits where *nil* purse seine activity occurred (compliance with the limits was independently verified). However, where some level of purse seine activity did occur, the evaluation in the dCMR was based on self-reported information, so for now the evaluation is **not** independently verified.

#### *Vessel capacity limits*

16. The tropical tuna CMM prescribes vessel capacity limits that apply to purse seine fleets and longline fleets of certain CCMs, and these limits define the subset of the vessels to which the limit applies based on certain criteria. For example, the [CMM 2021-01 44](#) limit applies to longline vessel with freezing capacity targeting bigeye tuna, which are not operating under domestic quotas.

17. Through the dCMR process, there has been an opportunity for the relevant CCMs to notify WCPFC of the applicable vessel capacity limits. The vessel number limits for most CCMs have been published through the CMM page on the website. These are provided as numbers, and the Secretariat does not presently receive from the flag CCMs a reference list of the vessels included in the baseline. Nor does the Secretariat receive in the report from flag CCMs, the list of the vessels that the flag CCM considers to be currently covered by the scope of the relevant vessel capacity limit at any point in time.

In the absence of such vessel-specific data, the approach used in dCMR evaluations compares the CCMs self-reported information submitted in their AR Pt 2. For example, reported total number of vessels that were active, to the derived total number of vessels from analyses using available RFV and VMS data (see Table 2).

18. For the evaluation of the purse seine capacity limits([CMM 2021-01 42](#)), the FFA Good Standing register data is also used to cross-check the RFV and VMS information. Although the comparison is still at the level of comparing total numbers of flagged vessels per CCM, there is slightly higher confidence in this evaluation of CCM-reported information with the Audit Point.

19. However, for the evaluation of longline vessel capacity limits ([CMM 2021-01 44](#) and [CMM 2021-01 45](#)), the data currently available to the Secretariat is only based on vessel type data from the Record of Fishing Vessels. This means the analyses used in the dCMR are not precise enough to relate to the prescribed limit, and consequently the Secretariat approach relies on self-reported information provided by the CCM (see Table 2).

20. The Secretariat considers that the level of verification of all vessel capacity limits would be strengthened if relevant CCMs were to notify WCPFC, possibly through updates made in the RFV, of key information that would assist the Secretariat with clearly defining the individual vessels on the RFV that are authorized to operate under a CCM's applicable vessel-based capacity limits. The aim of WCPFC compiling this information would be to provide a point of reference for the Secretariat to undertake analyses that cross-check VMS records and other data sources about the activities of the relevant vessels. This would improve the level of verification that could be undertaken in future dCMR evaluations of vessel capacity limits.

21. The evaluation of most vessel capacity limit obligations presented in the 2023 dCMR involved comparing the CCM's self-reported information in their AR Pt 2 to analyses using available RFV and VMS data.

22. Due to current data limitations, the evaluations in the 2023 dCMR of longline capacity limit obligations were **not** independently verified, and the purse seine capacity limit obligations were partially verified using FFA Good Standing data.

23. If capacity limits are intended to be used in the future as a part of WCPFC's ongoing fisheries management tools, additional individual vessel-specific information about each applicable CCM's vessels that are authorized to operate under each applicable vessel-based capacity limit is required to strengthen the level of verification for future dCMR evaluations. It will also be important for this information to be provided in a form that the Secretariat can use to link to the RFV, because this will ensure this additional data source can be used to cross-check with other WCPFC data sources.

*Limits based on “vessels fishing for” type limits*

24. The Commission has previously noted the ongoing difficulties related to interpretation of the term “actively fishing for” (and similar terms such as “directed at” and “targeting”). This continues to present challenges and makes it difficult for TCC to complete the assessments of some obligations during the CMR. At WCPFC18 (December 2021) the Commission also noted that the disparities in available operational-level data for determined baseline periods raised difficulties in undertaking compliance assessments as this results in some limits being based on analysis of operational-level data and other limits being based on self-reporting.<sup>6</sup>

25. Table 3 provides a list of five limit obligations which fall into this grouping. They are the “*fishing for vessel capacity limits*” in the south-west striped marlin CMM ([CMM 2006-04 01](#)), swordfish CMM ([CMM 2009-03 01](#)), south Pacific albacore CMM ([CMM 2015-02 01](#)), and “*effort based limits for vessels fishing for*” north Pacific albacore CMM ([CMM 2019-03 02](#)) and pacific bluefin tuna CMM ([CMM 2021-02 02](#)). Through the dCMR process, relevant CCMs have had the opportunity to notify their applicable vessel capacity limits, and limits for most CCMs have been published through the CMM page on the website.<sup>7</sup>

26. The approach used by the Secretariat in the 2023 dCMR compares the CCMs self-reported information in AR Pt 2 to the WCPFC Annual Catch and Effort Estimates (commonly abbreviated as ACE tables data) which are published summaries based on CCMs scientific data submissions.<sup>8</sup> However, there is a limitation because the ACE table summaries provide information about the levels of longline activity that was reported in the area where the limit applies. The information in these reports is not targeted only to the vessels that each flag CCM considers to be “fishing for” or “actively fishing for” and subject to the relevant CMM limit. This means the information used in the dCMR is not precise enough to relate to the prescribed limit, and consequently the Secretariat approach in the dCMR evaluation is based mostly on self-reported information provided by the CCM (see Table 3).

27. Like vessel capacity limits, the Secretariat considers that verification of obligations relating to limits on “*vessels fishing for*” would be strengthened if relevant CCMs were to notify WCPFC, possibly through updates made in the RFV, of key information that would assist the Secretariat with clearly defining the vessels on the RFV that are authorized to operate under a CCMs applicable fishing-for type limit. The aim of compiling this information would be to provide a point of reference for the Secretariat to undertake analyses that cross-check VMS records and other data sources about the activities of the

---

<sup>6</sup> WCPFC18 Summary Report, Final CMR Executive Summary

<sup>7</sup> In early 2023, the Secretariat released an enhanced CMM page that includes Audit Points and Limits (<https://cmm.wcpfc.int/>)

<sup>8</sup> <https://www.wcpfc.int/ace-by-fleet> this link also explains the agreed process that supports the consideration of the updates that CCMs may provide throughout the year of their scientific data submissions to also be considered in subsequent iterations of the ACE tables.

relevant vessels. This would improve the level of verification that could be undertaken in future dCMR evaluations of these types of limit obligations.

28. However, noting that these limits mostly apply to longline fisheries that are currently subject to a minimum requirement of 5% ROP coverage, there is a limitation because the ACE table summaries are based on scientific data provisions that are also submitted by CCMs for their vessel's activities. In this respect, the following outcome from SC19 is pertinent. SC19 "*noted the explanation from the SSP that aggregating the catch by species in the longline operational data at the trip level (when the trip is terminated by an at-sea transshipment) is fundamental for the validation processes using other independent sources of data (e.g. transshipment observers and carrier declarations) to provide more certainty in the data used in assessments and other work of the Commission.*"<sup>9</sup> To improve the level of independent verification of longline catch or effort limits, it is necessary to increase ROP observer coverage and to enable use of Electronic Monitoring so as to increase the scope and coverage, and thus the availability, of independently collected data.

29. The Commission has previously noted the ongoing difficulties related to interpretation of the term "actively fishing for" (and similar terms such as "directed at" and "targeting") which continue to present challenges and makes it difficult for TCC to complete the assessments of some obligations during the CMR. This issue remains unresolved by the Commission.

30. If longline fishing activity-based limits continue to be used in CMMs, additional information that will support the Secretariat's ability to identify the individual vessels on the RFV that are authorized to operate under each applicable CMM limit, will improve the level of verification that can be undertaken in preparing future dCMR evaluations of these types of limit obligations.

31. The work currently being undertaken by the TS-IWG and ERandEM IWG has the potential to expand the coverage of independently verified data sources. Once these independently verified data sources are established, these will further assist in improving the level of verification that can be undertaken in future dCMR evaluations for longline fishing activity-based limits.

### *Catch limits*

32. Table 4 provides a list of species or stock-based catch limits that apply in some WCPO longline fisheries. There are catch limits applying to most CCMs for south-west swordfish in the area south of 20S ([CMM 2009-03 02](#)), for bigeye caught in longline fisheries ([CMM 21-01 37](#) and [40](#)), for other commercial fisheries for bigeye, yellowfin and skipjack ([CMM 2021-01 47](#)), and for fisheries for pacific bluefin tuna ([CMM 2021-02 03](#) and [04](#)). The approach used by the Secretariat in dCMR evaluations compares the CCM's self-reported information in AR Pt 2, including in the relevant CMM required

---

<sup>9</sup> SC19 Outcomes document paragraph 6

reports, to the ACE tables data which are published summaries based on CCMs scientific data submissions (see Table 4).

33. Recalling the limitations in the use of ACE table summaries that have been referenced earlier in this paper. The Secretariat’s evaluation in the dCMRs of compliance with these limits will continue to be based almost entirely on self-reported information provided by the CCM, until the levels of independent monitoring are improved significantly, through increased observer coverage and implementation of E-monitoring.

34. The limit in the tropical tuna CMM for other commercial fisheries for bigeye, yellowfin, and skipjack ([CMM 2021-01 47](#)) was not included in the list of obligations to be evaluated in dCMR 2023. The Commission has previously noted some issues with the baselines for some CCMs fisheries, and the relevant monitoring programmes for these same fisheries are also limited. For certain CCMs other commercial fisheries within the scope of the tropical tuna CMM, there are continuing issues with verifying compliance with these catch limits.

35. It is acknowledged that there are some longline fisheries where the flag and/or coastal CCMs have achieved reasonable (high) levels of monitoring of fishing activities which means that some additional data is available to independently verify the limit. In these circumstances, and where the relevant data has been made available to the WCPFC and/or Scientific Services Provider, the level of verification would be higher than in other fisheries subject to the same applicable limits. Additionally, there are associated reporting requirements set out in some of these CMMs where CCMs are required to submit additional information about their approach to implement the CMM and the steps a CCM is following to ensure compliance by its vessels with catch limit/s and other obligations (see Table 4). Further elaboration by the Commission of the criteria for “higher” levels of monitoring in longline fisheries, could make it possible for the Secretariat, in future dCMR evaluations, to confirm to which CCMs longline fisheries there is a higher level of confidence in the verification of compliance with catch limits.

36. In the medium-term, work to develop and implement catch documentation schemes is also expected to provide better confidence in catch reporting, and this is expected to increase the level of verification that can be undertaken in the future of compliance with catch limits.

37. Due to current data limitations, the evaluations in the 2023 dCMR of various catch limit obligations are considered to **not** be independently verified.

38. For some fisheries where greater coverage by observers or E-monitoring has already been achieved, making the data available to WCPFC and/or Scientific Services provider in a form that can be readily used for cross-checking of fishing activities, would increase confidence in the evaluations that are undertaken through the dCMR of these catch limits.



39. Due to current and historical monitoring limitations, there are some catch limits that have been prescribed in CMMs for which there is no baseline data to inform the determination of a limit. Consequently, it is not possible for the Secretariat to verify reports or confirm compliance with these limits.

### **Verifying compliance with Implementation Obligations**

40. The adopted Audit Points<sup>10</sup> for implementation obligations are based on the following template language:

*The CCM submitted a statement in AR Pt2 that:*

- *confirms CCM's implementation through adoption of a national binding measure that ensures {xxx};*
- *describes how CCM is monitoring its vessels to ensure they do/do not {xxx}, and how potential infringements or instances of non-compliance with this requirement are handled.*

41. At present, CCMs include references and/or links to the relevant sections of their national policies and procedures in their AR Pt 2 reports. The short timeline between AR Pt 2 in mid-June and the initial dCMR issuance in late July, along with the current number of implementation obligations to be reviewed in the dCMR, makes it impossible for the Secretariat, as part of preparing the dCMR, to undertake detailed reviews of all CCMs national policies and procedures.

42. Consequently, the 2023 Secretariat evaluations in the dCMR of most implementation obligations involved the Secretariat comparing if a CCM's statement of implementation for an obligation reported in AR Pt 2 fully met the two parts (a. and b.) of the Audit Point. Table 5 (on page 19) includes a list of the implementation obligations where the Secretariat has used additional data sources to prepare the dCMR in 2023. This includes two obligations which were evaluated in the dCMRs prepared in 2023:

- [CMM 2009-03 03](#) because the adopted Audit Point included an additional provision specifying that the Secretariat was to “*verify some level of activity by the CCM's flagged vessels*”. In 2023, the Secretariat has used ACE Table data as the basis for verifying compliance.
- [CMM 2014-02 9a](#) because the Audit Point is not yet agreed. In this case, the Secretariat has documented in Table 5 the approach it has used to complete the evaluation of each CCMs VMS reporting.

---

<sup>10</sup> CMM 2021-03 paragraph 7 (ii) states that through the Compliance Monitoring Scheme the annual assessment of compliance for other obligations shall be determined based on the following criteria:

- a. Implementation – where an obligation applies, the CCM is required to provide information showing that it has adopted, in accordance with its own national policies and procedures, binding measures that implement that obligation; and
- b. Monitor and ensure compliance – the CCM is required to provide information showing that it has a system or procedures to monitor compliance of vessels and persons with these binding measures, a system or procedures to respond to instances of non-compliance and has taken action in relation to potential infringements.

- [CMM 2018-04 07a](#) because the adopted Audit Point included an additional provision specifying that the Secretariat was to *confirm the CCM provided information in AR Pt 2 of any CCM interactions with sea turtles in fisheries managed under the Convention and confirm that CCMs vessels are required to record all incidents involving sea turtles during fishing operations.*

43. When preparing past dCMRs for some implementation obligations, the Secretariat had previously reviewed some additional information that CCMs submitted in response to other reporting requirements for the same CMM. For example when evaluating CMM 2018-04 para 5a, related to sea turtle mitigation requirements, in addition to the CCM’s response to CMM 2018-04 5a question in AR Pt 2, the Secretariat would also review and reference the CCMs CMM 2018-04 para 2 report. Some additional examples of implementation obligations considered in the preparation of past dCMRs, where additional data sources had been considered, are also listed in Table 5 (related to silky shark and oceanic white-tip provisions in the Shark CMM, sea-turtle mitigation measures in purse seine and longline fisheries and seabird mitigation measures).

44. In 2023, the Secretariat considered that because the criteria for TCC’s evaluation are defined through the adopted Audit Point, the Secretariat has focused the dCMR evaluations on the Audit Point criteria. In other words, if the Audit Point is silent on specifying that the Secretariat confirm or verify based on information in AR Pt 2 and/or AR Pt 1 required reports, the Secretariat’s evaluation was unlikely to have included consideration of those additional CCM reported information as contained in AR Pt 2 and/or AR Pt 1.

45. The evaluation of most implementation obligations in the dCMR prepared by the Secretariat in 2023 involved comparing AR Pt 2 CCM self-reported information to the relevant Audit Point criteria.

46. Most evaluations in the 2023 dCMR of implementation obligations were not independently verified. One example of an exception was the evaluation of CMM 2014-02 9a because it is supported by analyses that facilitate the Secretariats checks of the CCM’s self-reported information using multiple data sources.

*Opportunities to enhance the independent verification of implementation obligations*

47. The Secretariat considers that a review and analysis of historical trends in CCM’s reporting of statements of implementation and required reports offers an opportunity to identify where there are potential implementation issues.

48. In considering whether there are additional data sources that could be used to support reviews of compliance with implementation obligations, it is important to recognise that the Regional Observer Programme (ROP) was established “*to collect verified catch data, other scientific data and additional information related to the fishery from the Convention Area and to monitoring the implementation of the conservation and*

*management measures adopted by the Commission*".<sup>11</sup> TCC19 paper [WCPFC-TCC19-2023-09 Use of ROP data in the Compliance Monitoring Scheme](#) details how data and information collected by the ROP are currently used in the CMS, and information about some of the current limitations.

49. The range of work currently being undertaken through various Intersessional Working Groups (IWG) to refine WCPFC's existing monitoring programs could support improvement in the quality and quantity of CCMs data available for independent verification of implementation obligations, including the ROP data field enhancements through the [IWG-ROP](#). Likewise, the [TS-IWG](#) is progressing the review of the Transshipment CMM and proposals are being considered to improve the data collection through independent monitoring of catch and transshipment related activities, and [ERandEM-IWG](#) is also progressing work to allow E-monitoring as a tool to meet WCPFC's data needs.

50. The experience in other RFMOs with auditing national compliance may also be informative. In the [2018 Report](#) from the Independent Panel to Review the CMS, the Panel recommended that WCPFC not look to a national compliance audit approach which periodically reviews all CCMs. Rather, the Panel recommended that until CCMs have agreed to a structured schedule of responses to non-compliance, the WCPFC should consider adopting a Quality Assurance-type of system for targeted application to CCMs, for circumstances where a pattern of serious non-compliance by a CCM has been identified, and where there may possibly be systemic failures.<sup>12</sup>

### **Verifying Transshipment Activities**

51. Table 6 includes three obligations that prescribe limits on CCM's transshipment activities and the various reporting requirements that are regularly reviewed through the dCMR. The first limit applies to purse seine at-sea transshipment ([CMM 2009-06 29](#)), another to high seas transshipments ([CMM 2009-06 34](#)), and the other prohibits transshipment in the Eastern High Seas Pocket ([CMM 2016-02 06](#)).

52. The approach used by the Secretariat in dCMR evaluations for verifying transshipment activities is a work-in-progress. The Annual Report on Transshipment ([RP03](#)) and the TCC19 paper on enhanced data analysis and interpretation ([TCC19-2023-18](#)) both explain the current status of the Secretariat's work to improve the analytical approach that would support future dCMR reviews of transshipment activities.

---

<sup>11</sup> WCPF Convention Article 28

<sup>12</sup> [WCPFC15-2018-26 Final Report from the Independent Panel to review the Compliance Monitoring Scheme](#) The panel had noted examples of some tuna RFMOs approach to national compliance audit processes. One example was that of CCSBT, which has a routine Quality Assurance-type system on a regular basis. Another example was the IOTC when a compliance mission had been completed in cooperation with the relevant CCM.

53. There is more detailed information related to the limitations on the current use of ROP data to support compliance reviews presented in TCC19 working paper 9.<sup>13</sup> The recently adopted ROP data fields may provide a regular source of observer data that can be used to cross-check reported transshipment events.

54. Proposals are being considered for improving the ability to better link catch and transshipment related information through the Transshipment Intersessional Working Group (TS-IWG). In addition, the IWG-ROP and ERandEM IWG is progressing work that is expected to refine and enhance the monitoring tools and associated reporting of at-sea transshipment activities in the WCPF Convention Area.

55. Due to current analytical and data limitations, the evaluations in the 2023 dCMR of various transshipment limit and reporting obligations were partially verified.

56. Future work by the Commission and the Secretariat has the potential in the short-term to improve the Commission's overall monitoring and verification framework for transshipment activities and work to improve independent verification of at-sea transshipment activities should be supported.

## **Recommendations**

57. TCC19 is invited to note and discuss the information in this paper related to the status of available data to support compliance reviews of certain obligations in the Compliance Monitoring Scheme (CMS).

58. TCC19 is invited to consider how best to support efforts by the Commission (including through relevant IWGs) to strengthen independent verification of key obligations in future WCPFC compliance reviews.

---

<sup>13</sup> [WCPFC-TCC19-2023-09](#) *Use of ROP data in the Compliance Monitoring Scheme*

**Table 1. Current data sources and approach to verify compliance with purse seine days fished limits**

Quantitative Limit Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2022
<p><b>CMM 2021-01 24</b> Purse seine EEZ limits (for skipjack, yellowfin and bigeye tuna) and advice from other coastal CCMs of EEZ limits to be applied</p>	<p>1. Coastal CCM or PNA Office on behalf of PNA Parties+Tokelau notified their EEZ PS effort or catch limit or collective PNA+Tokelau EEZ effort or catch limit to the Secretariat. 2. Coastal CCM confirms in AR Pt2 that its notified EEZ limit or the PNAO confirms on behalf of PNA+Tokelau that the notified collective EEZ limit has not been exceeded and the Secretariat can verify the CCM’s reported information and confirm that the notified EEZ or collective EEZ limit has not been exceeded.</p>	<p><b>Limit Type = Days</b> - AR Pt 2 - SPC and Secretariat prepared catch and effort data summaries (EEZ PS days effort or PNA+Tokelau collective PS days effort) – this takes into consideration reconciliation between logsheets, VMS and observer coverage</p> <p><b>Limit Type = Catch</b> - AR Pt 2</p>	<p>TTM summary table of reported PS days fished in waters under national jurisdiction in RY was used by WCPFC to verify compliance.</p> <p>However, if a Purse Seine EEZ limit is expressed as a catch limit, then the PS days fished in waters under national jurisdiction in RY will be noted in the dCMR. The catch and effort data summaries available to the Secretariat do not include PS catches by individual EEZ, so was based on the AR Pt 2 information.</p>
<p><b>CMM 2021-01 25</b> High seas purse seine effort limits applying 20N to 20S</p>	<p>CCM submitted its high seas PS effort level in the area between 20N and 20S in AR Pt 2 and the Secretariat can verify the CCM’s reported information and confirm that the allowable limit has not been exceeded.</p>	<p><b>Limit Type = Days</b> - AR Pt 2 - ACE Tables (reported PS days effort in 20N to 20S high seas of Convention Area in RY) - SPC and Secretariat prepared catch and effort data summaries (reported PS days effort in 20N to 20S high seas of Convention Area in RY) – this takes into consideration reconciliation between logsheets, VMS and observer coverage</p> <p><b>Limit Type = Vessels</b> - AR Pt 2 - Secretariat prepared reconciliation of WCPFC VMS data and HSP1 entry and exit reports</p>	<p>ACE Table data of reported fishing days effort by PS vessels that operated in high seas of Convention area in RY was used by WCPFC to verify compliance. For applicable CCMs, the choice to apply IATTC measures in the overlap area between IATTC and WCPFC has been considered.</p> <p>For vessels the Secretariat compared data related to the individual PH HSP1 catcher vessels that were reporting to WCPFC VMS, with the list of entry and exit reports received by the Secretariat from PH HSP1 catcher vessels in RY. The Secretariat also took into consideration if there were any pending WCPFC VMS or RFV authorization data gap issues for PH HSP1 catcher vessels related to the RY.</p>

**Table 2. Current data sources and approach to verify compliance with vessel capacity limits**

Quantitative Limit Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2022
<p><b>CMM 2021-01 42</b> Limit by flag on number of purse seine vessels &gt;24m with freezing capacity between 20N and 20S</p>	<p>The CCM reported its number of CCM flagged PS vessels &gt;24m with freezing capacity and operating between 20N and 20S and the Secretariat can verify the CCM’s reported information and confirm that the allowable limit has not been exceeded.</p>	<ul style="list-style-type: none"> <li>- AR Pt 2</li> <li>- Aggregate summary of Commission data (WCPFC RFV, Fished and Did not Fish and VMS data)</li> </ul>	<p>RFV and VMS data, and FFA good standing data is the available data that WCPFC used to verify compliance with the limit</p>
<p><b>CMM 2021-01 43</b> CCM reported whether it replaced any of its flagged large scale purse seine vessels in the previous year and has advised the Commission that the replacement vessel did not result in an increase in carrying capacity or an increase in catch or effort levels</p>	<p>CCM reported whether it replaced any of its flagged large scale purse seine vessels in the previous year and if so, that the replacement vessel did not result in an increase in carrying capacity or an increase in catch or effort from the level that was replaced, and the Secretariat can verify that the allowable limit was not exceeded.</p>	<ul style="list-style-type: none"> <li>- AR Pt 2</li> <li>- Aggregate summary of Commission data (WCPFC RFV, Fished and Did not Fish and VMS data)</li> </ul>	<p>[obligation not included in list for evaluation in dCMR prepared in 2023]</p>
<p><b>CMM 2021-01 44</b> Limit by flag on number of longline vessels with freezing capacity targeting bigeye above the current level (applying domestic quotas are exempt)</p>	<p>The CCM reported in AR Pt2 its number of flagged LL vessels with freezing capacity targeting bigeye and the Secretariat can verify the CCM’s reported information and confirm that the allowable limit has not been exceeded.</p>	<ul style="list-style-type: none"> <li>- AR Pt 2</li> <li>- Aggregate summary of Commission data (WCPFC RFV, Fished and Did not Fish and VMS data – but note RFV does not clearly identify which flag CCMs vessels are subject to the limit (only longline overall))</li> </ul>	<p>RFV and VMS data, which is by vessel type (and not specific to the defined limit), is the available data that WCPFC used to verify compliance with the limit</p>

Quantitative Limit Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2022
<p><b>CMM 2021-01 45</b> Limit by flag on number of ice-chilled longline vessels targetting bigeye and landing exclusively fresh fish above the current level or above the number of current licenses under established limited entry programmes (applying domestic quotas are exempt)</p>	<p>The CCM reported in AR Pt2 its number of flagged ice-chilled LL vessels targetting bigeye and landing exclusively fresh fish and the Secretariat can verify the CCM's reported information and confirm that the allowable limit has not been exceeded.</p>	<ul style="list-style-type: none"> <li>- AR Pt 2</li> <li>- Aggregate summary of Commission data (WCPFC RFV, Fished and Did not Fish and VMS data– but note RFV does not clearly identify which flag CCMs vessels are subject to the limit (only longline overall))</li> </ul>	<p>RFV and VMS data, which is by vessel type (and not specific to the defined limit), is the available data that WCPFC used to verify compliance with the limit</p>

**Table 3. Current data sources and approach to verify compliance with vessels fishing for-type limits**

Quantitative Limit Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2022
<p><b>CMM 2006-04 01</b> Limit number of fishing vessels fishing for MLS south of 15S to 2000 – 2004 levels</p>	<p>The CCM reported in AR Pt2 the number of its flagged vessels fishing for MLS south of 15S and the Secretariat can verify the CCM’s reported number of vessels and confirm that the CCM’s allowable limit has not been exceeded.</p>	<p>- AR Pt 2 - ACE Tables (reported catch by # vessels that operated in area S15S in RY) - <b>CMM 2006-04 04 Required Report</b></p>	<p>ACE Table data of reported catches by # of vessels that operated in area S15S in RY was used by WCPFC to verify compliance.</p>
<p><b>CMM 2009-03 01</b> Limit number of vessels fishing for SWO south of 20S to the number in any one year between 2000-2005</p>	<p>The CCM reported in AR Pt2 its total number of flagged vessels fishing for SWO south of 20S and the Secretariat can verify the CCM’s reported catch level and confirm that the CCM’s allowable limit has not been exceeded.</p>	<p>- AR Pt 2 - AR Pt 1 <b>CMM 2009-03 08 Required Report</b> - ACE Tables (# LL vessels that operated S20S in RY as reported in operational data)</p>	<p>[obligation not included in list for evaluation in dCMR prepared in 2023]</p>
<p><b>CMM 2015-02 01</b> Limit on number of vessels actively fishing for SP ALB south of 20S above 2005 or 2000-2004 levels</p>	<p>CCM reported its number of flagged vessels actively fishing for SP Albacore south of 20S and the Secretariat can verify the CCM’s reported information and confirm that the allowable limit has not been exceeded.</p>	<p>- AR Pt 2 - ACE Tables (# vessels that targeted SP ALB S20S in RY as reported in operational data) - <b>CMM 2015-02 04 Required Report</b></p>	<p>ACE Table data of reported catches by # of vessels that operated in area S20S in RY was used by WCPFC to verify compliance.</p>
<p><b>CMM 2019-03 02</b> CCMs take measures to ensure level of fishing effort by vessels fishing for NP ALB is not increased</p>	<p>CCM reported its level of fishing effort by its flagged vessels fishing for NP albacore and the Secretariat can verify that the allowable limit was not exceeded.</p>	<p>- AR Pt 1 and AR Pt 2 - ACE Tables (reported catch by vessels in Convention Areas north of equator in RY) - <b>CMM 2019-03 03 Required Report</b></p>	<p>[obligation not included in list for evaluation in dCMR prepared in 2023]</p>
<p><b>CMM 2021-02 02</b> Total effort by vessels for Pacific Bluefin limited to 2002 - 2004 levels in Area north of 20N</p>	<p>CCM reported its total level of fishing effort by CCM’s flagged vessels fishing for PBF north of 20N in its report to the Secretariat as required by paragraph 8 of the CMM, and the Secretariat can verify the CCM’s reported total fishing effort and confirm that the CCM’s allowable limit was not exceeded.</p>	<p>- AR Pt 2 - ACE Table data (days fishing effort north of 20N in RY as reported in operational data) - Annual Report to NC <b>CMM 2021-02 08 &amp; 14 Required Report</b></p>	<p>ACE Table data of fishing effort north of 20N in WCPFC area in RY was used by WCPFC as a partial source of data to verify compliance.</p>



**Table 4. Current data sources and approach to verify compliance with catch limits**

Quantitative Limit Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2022
<p><b>CMM 2009-03 02</b> Limit the catch of SWO by its vessels in area south of 20S to the amount in any one year during 2000-2006</p>	<p>The CCM reported in AR Pt2 its total catch of SWO by its flagged vessels in the area south of 20S and the Secretariat can verify the CCM's reported catch level and confirm that the CCM's allowable limit has not been exceeded.</p>	<ul style="list-style-type: none"> <li>- AR Pt 2</li> <li>- AR Pt 1 <b>CMM 2009-03 08 Required Report</b></li> <li>- ACE Tables (reported catch of vessels that operated S20S in RY)</li> </ul>	<p>ACE Table data of reported catches by # of vessels that operated in area S20S in RY was used by WCPFC to verify compliance.</p>
<p><b>CMM 2010-01 05</b> NP striped marlin catch limits applicable to CCMs with vessels fishing in the Convention Area north of the equator: commencing 2011</p>	<p>The CCM reported its catch level in AR Pt2 and the Secretariat can verify the CCM's reported catch limit and confirm that its allowable limit was not exceeded.</p>	<ul style="list-style-type: none"> <li>- AR Pt 2 <b>CMM 2010-01 08 Required Report</b></li> <li>- ACE Tables (reported catch by vessels in Convention Areas north of equator in RY)</li> </ul>	<p>ACE Table data of reported catches by # of vessels that operated in area north of the equator in RY was used by WCPFC to verify compliance. As is noted in the limit comment, some CCMs catches for 2000 - 2003 have not been verified.</p>
<p><b>CMM 2021-01 37</b> Bigeye longline annual catch limits for 2021-2023, with adjustment to be made for any overage</p>	<p>The CCM reported its total bigeye longline catch in its AR Pt2 and the Secretariat can verify the CCM's reported catch level and confirm that the allowable limit has not been exceeded.</p>	<ul style="list-style-type: none"> <li>- AR Pt 2</li> <li>- ACE Tables</li> <li>- SPC and Secretariat prepared catch and effort data summaries (reported catch of LL vessels of bigeye tuna in RY)</li> <li>- Summary of <b>CMM 2021-01 38 Required Report</b> (monthly report)</li> </ul>	<p>ACE Table data of reported bigeye longline catch by LL vessels that operated in Convention area in RY was used by WCPFC to verify compliance. For applicable CCMs, the choice to apply IATTC measures in the overlap area between IATTC and WCPFC has been considered.</p>
<p><b>CMM 2021-01 40</b> Bigeye longline catch limits by flag for certain other members which caught less than 2000t in 2004</p>	<p>CCM reported its total bigeye longline catch in its AR Pt 2 and the Secretariat can verify the CCM's reported catch level and confirm that it does not exceed 2,000mt.</p>	<ul style="list-style-type: none"> <li>- AR Pt 2</li> <li>- ACE Tables</li> <li>- SPC and Secretariat prepared catch and effort data summaries (reported catch of LL vessels of bigeye tuna in RY)</li> </ul>	<p>ACE Table data of reported bigeye longline catch by LL vessels that operated in Convention area in RY was used by WCPFC to verify compliance. For applicable CCMs, the choice to apply IATTC measures in the overlap area between IATTC and WCPFC has been considered.</p>
<p><b>CMM 2021-01 47</b> Limit on total catch of certain other commercial tuna fisheries (that take &gt;2000Mt of BET, YFT and SKJ)</p>	<p>[Audit Point not yet agreed]</p>	<ul style="list-style-type: none"> <li>- AR Pt 2</li> <li>- ACE Tables</li> <li>- SPC and Secretariat prepared catch and effort data summaries (provides best available catch estimates for some CCMs fisheries)</li> </ul>	<p>[obligation not included in list for evaluation in dCMR prepared in 2023]</p>

Quantitative Limit Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2022
<p><b>CMM 2021-02 03</b> Pacific bluefin tuna catch limits for Japan, Korea and Chinese Taipei applying from 2022</p>	<p>CCM reported its total catches of PBF less than 30kg and 30kg or larger and the Secretariat can verify the CCM's reported total catches and confirm that the total catch level does not exceed the CCM's allowable annual limit.</p>	<p>- AR Pt 2 - Annual Report to NC <b>CMM 2021-02 08 &amp; 14 Required Report</b></p>	<p>ACE Table data of WCPFC key species in WCPFC-south and WCPFC-north in RY provides a partial source of data for WCPFC to verify compliance.</p>
<p><b>CMM 2021-02 04</b> Pacific Bluefin 30kg or larger catch limits, by flag for certain other members</p>	<p>CCM reported its total catches of PBF 30kg or larger and the Secretariat can verify the CCM's reported total catches and confirm that the CCM's catch of PBF 30kg or larger has not increased by more than 15% above its allowable limit, or that the CCM's catch of PBF 30kg or larger has not exceeded 10mt beyond the CCM's applicable baseline catch limit.</p>	<p>- AR Pt 2 - Annual Report to NC <b>CMM 2021-02 08 &amp; 14 Required Report</b></p>	<p>ACE Table data of WCPFC key species in WCPFC-south and WCPFC-north in RY was used by WCPFC to verify compliance.</p>

**Table 5. Current data sources and approach to verify compliance with certain implementation obligations**

Implementation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2022
<p><b>CMM 2009-03 03</b> CCMs shall not shift their fishing effort for SWO to the area north of 20°S</p>	<p>1. CCM submitted a statement in AR Pt2 that:                      a.       confirms CCM’s implementation through adoption of a national binding measure that ensures that CCM flagged vessels do not shift effort (for swordfish) to the area north of 20S                      b.       describes how it is monitoring its flagged vessels to ensure they do not shift effort for SWO to the area north of 20S and how the CCM responds to potential infringements or instances of non-compliance with this requirement.                      2. The Secretariat can verify that the CCM’s flagged vessels have not shifted effort to the area north of 20S.</p>	<p>- AR Pt 2 and AR Pt 1                      - ACE Tables                      - Statement of Implementation</p>	<p>ACE Table data of reported catches by # of vessels that operated in area N of 20S in RY was used by WCPFC to verify compliance.</p>
<p><b>CMM 2014-02 9a</b> Fishing vessels comply with the Commission standards for WCPFC VMS including being fitted with ALC/MTU that meet Commission requirements</p>	<p>[Audit Point not yet agreed]</p>	<p>- AR Pt 2                      - Aggregate summary of Commission data (WCPFC VRST data, FFA report on daily position counts, FFA good standing records, WCPFC Fished and Did not fish reports)</p>	<p>Secretariat routinely checks information confirming that a vessel which is authorised on the RFV is fishing in the Convention Area beyond their flag CCMs EEZ. The checks undertaken by the Secretariat is to ensure that CCM has provided complete VTAF details and the vessels ALC is reporting OR that vessel is currently on the FFA Good Standing List. The Secretariat also retrospectively checks vessels with status of 'Fished' and ensure that the data for each vessel for the RY is complete. The Secretariat has provided CCMs with online tools 1) VRST allows CCMs to monitor and using the interactive utility update their vessel’s status (e.g., “In Port”, “Out of Convention Area”, “Manual Reporting”, “new VTAF data submitted to Secretariat”, etc.) at least every 31 days, 2) the Vessels system for RFV allows CCMs to request MTU activation and deactivation and to monitor the status of activation/deactivation by the Secretariat, and 3) the Secretariat has provided CCMs with an upload mechanism to submit manual position reports where there are identified VMS reporting gaps</p>

Implementation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2022
<p><b>CMM 2014-02 9a VMS SSPs 2.8</b> VMS Provision of ALC/MTU 'VTAF' data</p>	<p><b>[Report]</b> The Secretariat confirms that the CCM submitted information on annual catch levels by its flagged vessels taking SP Albacore, as well as the number of CCM flagged vessels actively fishing for SP Albacore south of 20S, with catch levels reported by species groups.</p>	<ul style="list-style-type: none"> <li>- AR Pt 2</li> <li>- Aggregate summary of Commission data (WCPFC VRST data, FFA report on daily position counts, FFA good standing records, WCPFC Fished and Did not fish reports)</li> </ul>	<p>Secretariat routinely checks information confirming that a vessel which is authorised on the RFV is fishing in the Convention Area beyond their flag CCMs EEZ. The checks undertaken by the Secretariat is to ensure that CCM has provided complete VTAF details and the vessels ALC is reporting OR that vessel is currently on the FFA Good Standing List. The Secretariat also retrospectively checks vessels with status of 'Fished' and will request that the relevant CCM clarify the status of vessels as needed</p>
<p><b>CMM 2018-03 01</b> Required longline mitigation measures to be used by vessels fishing south of 30S (hook-shielding devices OR at least two of these options: weighted branch lines, night setting and tori lines)</p>	<p>[Audit Point not yet agreed]</p>	<ul style="list-style-type: none"> <li>- AR Pt 2 Statement of Implementation and Required Report (CMM 2018-03 para 8)</li> <li>- ACE Tables</li> <li>- AR Pt 1</li> </ul>	<p>[obligation not included in list for evaluation in dCMR prepared in 2023]</p>
<p><b>CMM 2018-03 02</b> From 1 Jan 2020 required longline mitigation measures to be used by longline vessels in the high seas between 25S - 30S (one of these options: weighted branch lines, night setting or tori lines)</p>	<p>[Audit Point not yet agreed]</p>	<ul style="list-style-type: none"> <li>- AR Pt 2 Statement of Implementation and Required Report (CMM 2018-03 para 8)</li> <li>- ACE Tables</li> <li>- AR Pt 1</li> </ul>	<p>[obligation not included in list for evaluation in dCMR prepared in 2023]</p>

Implementation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2022
<p><b>CMM 2018-03 06</b> Required longline mitigation measures to be used by longline vessels &gt; 24m fishing north of 23N (choose 2 from Table 1 including at least 1 from Column A) and longline vessels &lt; 24m fishing north of 23N (at least 1 measure from Column A in Table 1)</p>	<p>[Audit Point not yet agreed]</p>	<p>- AR Pt 2 Statement of Implementation and Required Report (CMM 2018-03 para 8) - ACE Tables - AR Pt 1</p>	<p>[obligation not included in list for evaluation in dCMR prepared in 2023]</p>
<p><b>CMM 2018-04 05a</b> Sea Turtle mitigation requirements for purse seine vessels</p>	<p>[Audit Point not yet agreed]</p>	<p>- AR Pt 2 Statement of Implementation and Required Report (CMM 2018-04 para 2)</p>	<p>[obligation not included in list for evaluation in dCMR prepared in 2023]</p>
<p><b>CMM 2018-04 06</b> CCMs to require longline vessels to carry and use line cutters and de-hookers to handle and promptly release sea turtles, as well as dip-nets where appropriate</p>	<p>CCM submitted a statement in AR Pt2 that: a. confirms CCM's implementation through adoption of a national binding measure that requires operators of CCM flagged LL vessels to carry and use line cutters and de-hookers to handle and promptly release sea turtles caught or entangled and where appropriate, carry and use dip-nets in accordance with WCPFC guidelines</p>	<p>- AR Pt 2 Statement of Implementation and Required Report (CMM 2018-04 para 2)</p>	<p>n/a - because the evaluations in dCMR prepared in 2023 was based on the adopted Audit Point</p>

Implementation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2022
	<p>b. describes how CCM is monitoring its flagged LL vessels to ensure this requirement is followed and how potential infringements or instances of non-compliance with this requirement are handled.</p>		
<p><b>CMM 2018-04 07a</b> Sea Turtle mitigation requirements for shallow-set longline vessels</p>	<p>CCM submitted a statement in AR Pt2 that:</p> <p>a. confirms CCM’s implementation through adoption of a national binding measure that requires operators of CCM flagged LL vessels to employ at least one of the three mitigation methods listed in paragraph 7a of the CMM</p> <p>b. describes how CCM is monitoring its flagged LL vessels to ensure that at least one of the mitigation measures in paragraph 7a of the CMM is being employed, and how potential infringements or instances of non-compliance with this requirement are handled.</p> <p>and the Secretariat confirms that CCM provided information in AR Pt 2 of any CCM vessel interactions with sea turtles in fisheries managed under the Convention and confirmation that CCM vessels are required to record all incidents involving sea turtles during fishing operations.</p>	<p>- AR Pt 2 Statement of Implementation and Required Report (CMM 2018-04 para 2) - ACE Tables</p>	<p>n/a - because in 2023 Secretariat inadvertently overlooked the third section of the Audit Point when preparing the dCMR in 2023.</p> <p>Otherwise the verify note would have been something like: ACE Table data in RY providing hooks between floats was used by WCPFC to check applicability. CMM 2018-04 para 2 report which is to include information about sea turtle interactions for RY was used by WCPFC to verify compliance.</p>

Implementation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2022
<p><b>CMM 2022-04 22 (01)</b> Prohibit retaining/transhipping/storing/landing oceanic whitetip &amp; silky sharks</p> <p><b>(02)</b> Requirement to release oceanic whitetip &amp; silky sharks asap</p> <p><b>(03)</b> If oceanic whitetip &amp; silky sharks caught, must be given to govt or discarded</p>	<p>CCM submitted a statement in AR Pt2 that:</p> <p>a. confirms CCM's implementation through adoption of a national binding measure that prohibits CCM flagged vessels or vessels under CCM charter to retain on board, tranship, store, or land any oceanic whitetip or silky shark, in whole or in part; requires release of any oceanic whitetip or silky shark that is caught, in accordance with applicable safe release guidelines; surrender in whole any unintentionally caught oceanic whitetip or silky shark that are frozen as part of CCM flagged PS vessels' operation to the responsible government authorities or discard them at the point of landing or transhipment, upon which any surrendered OWT or SS may be donated for human consumption</p> <p>b. describes how CCM is monitoring its flagged vessels or vessels it charters to ensure the requirements are met, and how potential infringements or instances of non-compliance with this requirement are handled.</p>	<p>- AR Pt 2 - AR Pt 1 for supporting detail - Estimated number of releases of oceanic whitetip shark and silky shark caught in Convention Area, including the status upon release (dead or alive), through data collected from observer programs and other means.</p>	<p>n/a - because the evaluations in dCMR prepared in 2023 was based on the adopted Audit Point</p>

**Table 6. Current data sources and approach to verify limits and other reporting requirements associated with transshipment activities**

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2022
<p><b>CMM 2009-06 29</b> Limit on purse seine vessels transshipment outside of port to vessels that have received an exemption from the Commission. Where applicable, flag CCM authorisation should be vessel-specific and address any specific conditions identified by the Commission.</p>	<p>The Secretariat verifies the information reported by the CCM in AR Pt 2 and confirms that the CCM's allowable limit of PS vessels transshipping outside of port has not been exceeded. *Note additional reporting obligations for COVID19-related requirements: The Secretariat has received information in AR Pt 2 of the CCM's approach to implementation of the suspension from 20 April 2020 to 15 March 2022.</p>	<p>-AR Pt 2 - TCC Application - Aggregate summary of Commission data (RFV field for PS vessel authorisation to tranship)</p>	<p>The RFV updates of data field "PS Authorised to tranship at sea" were reviewed by the Secretariat</p>
<p><b>CMM 2009-06 34</b> Ban on high seas transshipment, unless a CCM has determined impracticability in accordance with para 37 guidelines, and has advised the Commission of such.</p>	<p>The Secretariat confirms that none of the vessels for which the CCM is responsible has engaged in high seas transshipment, unless the CCM indicated in the WCPFC Record of Fishing Vessels or by other means of communication that the vessel or vessels are authorized pursuant to paragraph 37 of CMM 2009-06 to engage in high seas transshipment activities.</p>	<p>-AR Pt 2 - TCC Application - Aggregate summary of Commission data (RFV field for authorization to tranship compared to reported transshipment event)</p>	<p>The TSER reporting and RFV updates of data field "HS Authorised to tranship at sea" were reviewed by the Secretariat</p>
<p><b>CMM 2016-02 06</b> Transshipment is prohibited in E-HSP from 1 Jan 2019</p>	<p>The Secretariat confirms that none of the vessels for which the CCM is responsible has engaged in transshipment activities in the EHSP.</p>	<p>- AR Pt 2 - Aggregate summary of Commission data (WCPFC VMS data and high seas transshipment reports)</p>	<p>[obligation not included in list for evaluation in dCMR prepared in 2023]</p>



Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2022
<p><b>CMM 2009-06 11</b> Annual report on all transshipment activities covered by this Measure (including transshipment activities that occur in ports or EEZs) in accordance with the specified guidelines (Annex II)</p>	<p>The Secretariat confirms receipt by the CCM in AR Pt 1 of the required information in the prescribed format contained at Annex II of CMM 2009-06, and confirms that the report includes the required information for all CCM transshipment events in the Convention Area of all HMFS covered by the Convention, as well as HMFS taken in the Convention Area and transhipped outside the Convention Area, in accordance with paras 10, 11, and 12 of CMM 2009-06.</p>	<p>- AR Pt 2 - AR Pt 1 (09-06 11 required report) - Summary of Commission data (high seas transshipment reports is reviewed by the Secretariat)</p>	<p>Secretariat will request additional information if in relation to any inconsistencies in the AR Pt1 report with Secretariat database.</p>
<p><b>CMM 2009-06 35 a (ii)</b> Flag State's notification to the Secretariat on its flag vessels that are authorised to tranship on the high seas</p>	<p>The Secretariat confirms that CCM indicated its flagged vessels authorized to tranship on the high seas, including by completing the relevant data field in the RFV data.</p>	<p>- AR Pt 2 - RFV</p>	<p>The RFV updates of data field "HS Authorised to tranship at sea" were reviewed by the Secretariat</p>
<p><b>CMM 2009-06 35 a (iii)</b> High Seas WCPFC Transshipment Advance Notification (including fields in Annex III)</p>	<p>Where a CCM (or chartering CCM) has indicated that it has authorized its flagged vessels to engage in high seas transshipment and indicated such authorization in its RFV, the Secretariat confirms that it has received the corresponding WCPFC high seas</p>	<p>- AR Pt 2 - Summary of Commission data (high seas transshipment reports &amp; # of transshipment notifications when compared to transshipment events)</p>	<p>The counts above are based on a comparison of notifications/declarations received in accordance with Annex III of CMM 2009-06 or WCPFC ER standards for high seas transshipment, with the Secretariats with criteria to link to applicable transshipment events.</p>
<p><b>CMM 2009-06 35 a (iii)</b> High Seas WCPFC Transshipment Declaration (including information in Annex I)</p>	<p>Where a CCM (or chartering CCM) has indicated that it has authorized its flagged vessels to engage in high seas transshipment and indicated such authorization in its RFV, the Secretariat confirms that it has received the corresponding WCPFC high seas transshipment declaration in respect of each CCM-authorized vessel in accordance with Annex I of CMM 2009-06 or WCPFC ER Standards for high seas transshipment.</p>	<p>- AR Pt 2 - Summary of Commission data (high seas transshipment reports &amp; # of transshipment declarations when compared to transshipment events)</p>	<p>The counts above are based on a comparison of notifications/declarations received in accordance with Annex I of CMM 2009-06 or WCPFC ER standards for high seas transshipment, with the Secretariats with criteria to link to applicable transshipment events</p>