



TECHNICAL AND COMPLIANCE COMMITTEE

Twentieth Regular Session

25 September to 1 October 2024

Pohnpei, Federated States of Micronesia (Hybrid)

Available Data for Verifying compliance in the Compliance Monitoring Scheme

WCPFC-TCC20-2024-25

29 August 2024

Submitted by the Secretariat

Purpose

1. This paper presents an update of the [TCC19 paper 19](#) which was first prepared by the Secretariat for TCC19 in 2023, in response to a Commission task.¹ In noting the value of the paper in guiding and enhancing the work of TCC and the Commission, as well as relevant intersessional working groups, TCC19 recommended that the Secretariat provide this paper as a standing paper and agenda item for TCC in the future².
2. 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. CCMs may find the Annual Reporting guidance provided in [TCC20-2024-27](#) a useful companion reference. This 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.

2024 Updates

3. Updates in this paper draw from two years of applying the adopted Audit Points when developing the draft Compliance Monitoring Report (dCMR). In addition, the past two years of experience gained through work undertaken by two analytical consultancies³ 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

¹ WCPFC19 tasked the Secretariat to "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)).

² See paragraphs 222 and 223 of the TCC19 Summary Report [<https://meetings.wcpfc.int/node/21020>]

³ See [TCC19-2023-18](#) *Enhanced data analysis and interpretation: Experiences and Opportunities*

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 most current version of 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 2024 (covering 2023 reporting year).

List of tables in Annex 1:

Table 1. Current data sources and approach to verify compliance with purse seine days fished limits	16
Table 2. Current data sources and approach to verify compliance with vessel capacity limits	17
Table 3. Current data sources and approach to verify compliance with <i>vessels fishing for</i> -type limits	19
Table 4. Current data sources and approach to verify compliance with catch limits	20
Table 5. Current data sources and approach to verify compliance with certain implementation obligations	22
Table 6. Current data sources and approach to verify limits and other reporting requirements associated with transshipment activities	29

Verifying limit obligations

5. Adopted Audit Points⁴ for limits are based on the following template language:

The CCM reported (where applicable in Annual Report Part 2 (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.

⁴ [CMM 2023-04](#) paragraph 8 (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.

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. Usually, this report will be submitted through the CCM's AR Pt2. The guidance provided by Audit Points confirms that the Secretariat 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, e.g. transshipment activities.
8. The Commission at WCPFC20 (2023) noted the general limitation of TCC's assessments of compliance by CCMs with all billfish CMM limits because they are based on self-reported information, and further noted that there will continue to be limited data available to the Secretariat to independently verify the reporting by CCMs of compliance with these limits until the levels of independent monitoring are improved significantly through increased observer coverage and implementation of E-monitoring.⁵
9. Table 1 – Table 4, below, present the review of current data sources and verification approach to different limit types and the relevant audit points. It should be noted that the existing data sources that are available to the Secretariat to verify compliance with limits vary in coverage and scope across fisheries. In addition, based on the audit points, different types of limits require different approaches to verify a CCM's reported information (for example see Figures that show the proportion of observer coverage achieved in longline and purse seine fisheries compared to fishing effort shown on pages 21-22 of the [TCC19 Summary Report](#)). 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". This information could support TCCs consideration of the WCPFC20 task that TCC20 considers whether any adopted audit points for Quantitative Limit obligations require additional verification sources or processes to better facilitate compliance assessments⁶

Limits on Purse seine fishing days

10. Most *purse seine effort limits* in the tropical tuna CMM are specified in terms of purse seine fishing days ([CMM 2023-01 24](#) and [CMM 2023-01 25](#)). In 2024, the approach used by the Secretariat in the dCMR to verify compliance with the applicable purse seine fishing days limits in 2023, was 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).

⁵ See paragraph 704 of the WCPFC20 Summary Report_Rev01. [<https://meetings.wcpfc.int/node/21722>]

⁶ See paragraph 754(f) of the WCPFC20 Summary Report_Rev01.

11. 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) also has high coverage.⁷
12. 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.⁸ The Secretariat's verification approach uses a 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 of purse seine fishing activity, because suitable information was not available to the Secretariat when preparing the dCMR, the Secretariat approach in 2023 and 2024 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.
13. 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 2023-01 25](#)). In 2024, the Secretariat used the report that SPC prepares to verify the days fished part of the limit in 2023. For the catcher vessel limit, the Secretariat separately verified compliance with the vessel limit using analyses of WCPFC Vessel Monitoring System (VMS) data, Record of Fishing Vessels (RFV) data and High Seas Pocket 1 (HSP1) entry and exit reports.

14. The 2024 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.
15. The 2024 evaluation presented in the dCMR of one CCM's purse seine with a HSP1 catcher vessel limit was independently verified using data from multiple sources that were analyzed by the Secretariat.
16. For the catch-based purse seine fishery EEZ limits, some data was available to the Secretariat to verify some, but not all, CCM 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.

⁷ For specific levels of coverage see Table 15 in [TCC20-2024-IP05](#) for purse seine operational catch and effort data, [WCPFC-TCC20-2024-09](#) and [TCC20-2024-IP03](#) for purse seine observer data coverage, and TCC20-2024-RP01 for information about WCPFC VMS coverage.

⁸ Based on CMM 2023-01 Table Att 1 Table 1: Australia, French Polynesia, Indonesia, New Caledonia, New Zealand

Vessel capacity limits

17. 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 2023-01 45](#) limit applies to longline vessels with freezing capacity targeting bigeye tuna, which are not operating under domestic quotas.
18. 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 WCPFC website. These are provided as numbers and currently, the Secretariat does not receive a reference list of the vessels included in the baseline from flag CCMs. 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 in 2023 and 2024 compares the CCMs self-reported information submitted in their AR Pt2. For example, the reported total number of vessels that were active is compared to the derived total number of vessels from analyses using available RFV and VMS data (see Table 2).
19. For the evaluation of the purse seine capacity limits applying in 2023 ([CMM 2023-01 43](#)), 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.
20. However, for the evaluation of longline vessel capacity limits applying in 2023 ([CMM 2023-01 45](#) and [CMM 2023-01 46](#)), the data currently available to the Secretariat is only based on vessel type data from the RFV. 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).
21. 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.
22. At TCC19 (2023) some CCMs suggested that WCPFC20 consider adding a data field to the RFV that would allow a CCM to report via the RFV whether vessel capacity limits (CMM 2021-01 42, 43, 44 and 45) apply to a vessel, to support the Secretariat's ability to independently verify compliance with capacity limit obligations⁹. However, there was no decision by the Commission at WCPFC20 on this suggestion. To support the dCMR

⁹ See paragraphs 213 and 214 of the TCC19 Summary Report. [<https://meetings.wcpfc.int/node/21722>]

evaluations in 2024, the Secretariat has sought clarification from those CCMs subject to purse seine and longline capacity limits.

23. The evaluation of most vessel capacity limit obligations presented in the 2024 dCMR involved comparing the CCM’s self-reported information in their AR Pt2 to analyses using available RFV and VMS data.
24. Due to current data limitations, the evaluations in the 2024 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.
25. 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.

“Vessels fishing for” type limits

26. 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 CMR assessments for some obligations. Table 3 provides a list of six limit obligations which fall into this grouping. Five obligations 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*” in the north Pacific albacore CMM ([CMM 2019-03 02](#)) and pacific bluefin tuna CMM ([CMM 2023-02 02](#)). Another recent obligation is an “*effort-based limit for vessels taking*” in the north Pacific swordfish CMM ([CMM 2023-03 02](#)).
27. The Commission also previously 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.¹⁰ To support TCC CMR assessments, the dCMR process has encouraged that relevant CCMs notify their applicable vessel capacity limits, and these often self-notified limits are published through the CMM page on the website.¹¹
28. In 2024, as part of the dCMR evaluations, the Secretariat has received queries from CCMs subject to “*fishing-for*” limits to clarify the source of information for the Secretariats dCMR evaluation related to 2023 activities. The approach used by the Secretariat in dCMR in 2024 is mostly the same as in 2023. This has compared the CCM’s self-reported information in

¹⁰ WCPFC18 Summary Report, Final CMR Executive Summary

¹¹ In early 2023, the Secretariat released an enhanced CMM page that includes Audit Points and Limits (<https://cmm.wcpfc.int/>)

AR Pt2 to the WCPFC Annual Catch and Effort Estimates (commonly abbreviated as ACE tables data) which are published summaries prepared by SPC, in their capacity as WCPFC's Scientific Data Manager.¹² The ACE Tables data are based on CCM's scientific data submissions, however, there is a limitation because the ACE table summaries provide information about the levels of longline activity that were 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).

29. In 2024, the Secretariat's dCMR evaluation of the limit obligation in paragraph 01 of [CMM 2015-02 01](#) applied for the first time the Commission-agreed definition of "actively fishing for", which was adopted at WCPFC20 and defined as follows:¹³.

"Vessels fishing south of 20 degrees South with an annual catch of albacore in that area with South Pacific albacore greater than 50% of the catch of potential target tuna (albacore, yellowfin, bigeye, southern bluefin), skipjack and swordfish."

If the experience of TCC20's review of the dCMR for the [CMM 2015-02 01](#) limit obligation is positive, a similar approach could be considered for the other "fishing for" and "fishing effort" type limits.

30. Noting that these limits mostly apply to longline fisheries that are currently subject to a minimum requirement of 5% ROP coverage, at least for the medium-term, there will continue to be a limitation if the dCMR assessments are based on ACE table summaries alone. This is because the ACE tables are based on scientific data provisions, which are also submitted by CCMs for their vessel's activities and are also mostly self-reported. 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."¹⁴ So 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.
31. For the short-term, until higher and representative levels of independent verification of longline catch or effort limits are achieved, the Secretariat again proposes that opportunities to strengthen assessments of vessel capacity limits is considered. At TCC19, TCC considered [TCC19 paper 19](#), and recommended that WCPFC20 consider: Whether a

¹² <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.

¹³ See paragraph 289 of the WCPFC20 Summary Report_Rev01.

¹⁴ SC19 Outcomes document paragraph 6

new data field, “*Target Species*” should be added to the RFV and, if so, task TCC20 with developing the data field and framework for potential future implementation.¹⁵

32. To support consideration of this recommendation at WCPFC20, the Secretariat’s suggestion was further expanded in [WCPFC20 Working paper 13](#). The specific suggestion made at WCPFC20 was that CCMs would be required to notify WCPFC, possibly through updates made in the RFV, of the key information that would assist the Secretariat with clearly identifying the vessels on the RFV that are authorized to operate under a CCM’s applicable “*fishingfor*” type limit. Although there was no decision at WCPFC20 on the suggestion to establish this report, for completeness and for ease of reference this was the suggestion made in [WCPFC20 Working paper 13](#):

a. *Adopt a framework that will establish RFV-reporting requirements for the CMM 2015-02 paragraph 1 limits and other “vessels fishing for-type CMM limits”, by adopting an amendment to the RFV SSPs CMM 2022-05 which adds into Attachment 1 a new data field “Area based CMM limit obligation(s)” as described in the following table:*

Min. ¹⁶	Field name	Field format	Field description/instructions	Example	Ref. in CMMs
	Area based CMM limit obligation(s)	Text If vessel is authorised under multiple CMMs, separate applicable obligations with “,”	Any CMM-specific authorisations granted by the flag State for the vessel to fish under one or more specific “vessel is fishing for area-based CMM limits” Enter the obligation identifier eg “CMM 20xx-xx xx” as listed in Area based CMM limit obligation list maintained by the WCPFC Secretariat. Leave blank if the vessel is not authorized by its flag State to be used for fishing under any of the specified CMM limits.	CMM 2015-02 01, CMM 2019-03 01	CMM 2018-06 or its replacement: 6(r)

b. *Task the Secretariat with prioritizing the development of an enhancement to the WCPFC’s annual reporting online facilities to enable relevant CCMs to complete a report as part of Annual Report Part 2, for individual vessels an equivalent of “fished” and “did not fish” in accord with the relevant CMM*

¹⁵ See paragraph 225 of TCC19 Summary Report.

¹⁶ Fields marked “√” in this column together comprise the “minimum data requirements” for inclusion on the RFV, as described in CMM 2022-05 paragraphs 11 and 12.

limit(s) in the previous year (this would be based on the CCM reported RFV data in previous year at a. above).

- c. *Task the Secretariat to continue to consider opportunities for relevant flag CCMs to be supported and informed about potential reporting gaps arising from the new RFV data field and associated annual reporting requirements, and to explore IT-related tools to assist the Secretariat with working closely with relevant CCMs to resolve any data and reporting inconsistencies in advance of dCMR evaluations.*
 - d. *Task the Secretariat, working with relevant CCMs, to review and update the CMM database with information about basis for baselines for specific “area-based vessels fishing for” type limit obligations and to present an update on progress to TCC20 in 2024.*
33. The aim of establishing additional reporting by CCMs related to their vessels which are operating under applicable vessel capacity limits, is to enhance opportunities for the Secretariat to undertake cross-checks of what is otherwise mostly self-reported information. Regular reported information about which individual vessels were authorized to be fishing for a particular species/stock under a CCMs applicable “*fishing for*” type limit, would usefully provide the Secretariat with a point of reference for analyses that aim to cross-check AR Pt2 reporting, VMS records, catch and effort data and other available reports about the activities of the relevant vessels. This would improve the level of verification that could be undertaken in future dCMR evaluations for these types of limit obligations.

34. 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 review. This issue remains unresolved by the Commission.
35. If longline fishing activity-based limits continue to be used in CMMs, in the short-term and until higher and representative levels of independent verification of longline catch or effort limits are achieved, additional information that will support the Secretariat’s ability to identify the individual vessels operating under each CCMs applicable CMM limit should be considered to improve the level of verification that can be undertaken in preparing future dCMR evaluations of these types of limit obligations.
36. TCC20 should consider if a new data field, “*Target Species*” should be added to the RFV and, if so, the Secretariat suggestion from [WCPFC20 Working paper 13](#) could provide a starting point for work to further develop the data fields and framework for potential future implementation.
37. TCC20 should also consider if the experience from applying the agreed definition for the [CMM 2015-02 01](#) limit obligation, indicates that a similar approach might

usefully support dCMR evaluations of the other “*fishing for*” and “*fishing effort*” type limits in Table 3.

38. 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

39. 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 20°S ([CMM 2009-03 02](#)), for North Pacific striped marlin fisheries North of the equator ([CMM 2010-01 05](#)), for bigeye caught in longline fisheries ([CMM 2023-01 38](#) and [CMM 2023-01 41](#)), for other commercial fisheries for bigeye, yellowfin and skipjack ([CMM 2023-01 48](#)), and for fisheries for Pacific bluefin tuna ([CMM 2023-02 03](#) and [04](#)). In 2024, the approach used by the Secretariat in dCMR evaluations of 2023 activities compares the CCM’s self-reported information in AR Pt2, including in the relevant CMM required reports, to the ACE tables data which are published summaries based on CCM’s scientific data submissions (see Table 4).
40. 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 or implementation of E-monitoring, or a combination of the two.
41. The limit in the tropical tuna CMM for other commercial fisheries for bigeye, yellowfin, and skipjack ([CMM 2023-01 48](#)) was not included in the list of obligations to be evaluated in dCMR 2023 and 2024. 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 CCM’s other commercial fisheries within the scope of the tropical tuna CMM, there are continuing issues with verifying compliance with these catch limits.
42. 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. The Commission's approach to incentivize increased longline observer coverage through the option in CMM 2023-01 Attachment 1, Table 3 is a positive first step. The work currently being undertaken by the TS-IWG and ERandEM IWG has the potential to expand the coverage of independently verified data sources.

43. 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. The Northern Committee at its recent meeting, and through the joint working group with IATTC, has continued to progress work that could in the future enhance the verification of Pacific Bluefin catch limits. In this respect there are two areas of work from [NC20 Meeting](#) held in July 2024 that are useful to note:

- The Joint IATTC and WCPFC-NC Working Group held its fifth Catch documentation Scheme technical meeting, to progress the development of a Catch Documentation Scheme for Pacific Bluefin tuna, with the stated purpose of combatting IUU fishing providing a means of preventing PBF and its products identified as caught by or originating from IUU fishing activities from moving through the commodity chain and ultimately entering markets ([NC20 Summary Report](#), Attachment C refer to Annex F)
- NC20 has recommended to the Commission a draft Conservation and Management Measure for the Monitoring, Controlling, and Surveillance of Pacific Bluefin Tuna ([NC20 Summary Report](#), Attachment E) which aims to establish annual reporting requirements to strengthen monitoring and data collecting system for Pacific bluefin tuna fisheries and farming.

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

45. 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.

46. 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

47. The adopted Audit Points¹⁷ 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.*

48. At present, CCMs include references and/or links to the relevant sections of their national policies and procedures in their AR Pt2 reports. The Secretariats understanding is that these are noted for the further review by CCMs (if interested), but that a review of the national implementation itself is not required as part of the dCMR preparations.

49. Consequently, in 2023 and 2024 the Secretariat evaluations in the dCMR of most implementation obligations involved the Secretariat checking if a CCM's statement of implementation for an obligation reported in AR Pt2 fully met the two parts (a. and b.) of the Audit Point. Table 5 (on page 21) includes a list of the implementation obligations reviewed in the dCMR in 2023 and 2024, and notes about whether any additional data sources were used to prepare the dCMR. In 2023 and 2024, there were three obligations where additional data was used to provide some verification of compliance:

- [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 used ACE Table data as the basis for verifying compliance, and in 2024 this obligation was not included in the list for review in the CMR.
- [CMM 2014-02 9a](#) because the Audit Point was not? agreed until December 2023, in 2023 the Secretariat documented in Table 5 the approach it used to complete the evaluation of each CCMs VMS reporting (covering 2022 activities). In 2024, the Secretariat has applied both the Audit Point and has maintained the verification approach used in 2023.
- [CMM 2018-04 07 \(a, b\)](#) because the adopted Audit Point included an additional provision specifying that the Secretariat was to *confirm the CCM provided information in AR Pt2 of any CCM interactions with sea turtles in fisheries managed under the Convention and*

¹⁷ CMM 2023-04 paragraph 8 (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.

confirm that CCMs vessels are required to record all incidents involving sea turtles during fishing operations.

50. 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 Pt2, 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).
51. In 2023 and 2024, 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 Pt2 and/or AR Pt 1 required reports, the Secretariat's evaluation was unlikely to have included included a qualitative consideration of those additional CCM reported information as contained in AR Pt2 and/or AR Pt 1.

- | |
|---|
| <ol style="list-style-type: none">52. The evaluation of most implementation obligations in the dCMR prepared by the Secretariat in 2023 and 2024 involved comparing AR Pt2 CCM self-reported information to the relevant Audit Point criteria.53. Most evaluations in the 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 Secretariat's checks of the CCM's self-reported information using multiple data sources. |
|---|

Opportunities to enhance the independent verification of implementation obligations

54. 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.
55. 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"*.¹⁸ 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.

¹⁸ WCPF Convention Article 28

56. 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 CCM's 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.
57. 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.¹⁹
58. The final CMR adopted at WCPFC20 records some of the points of view that were expressed last year at TCC19 (in 2023) regarding possible linkages to information about potential infringements by vessels, the aggregated summary tables drawn from the online Compliance Case File System, and the IUU listing procedure.

"TCC19 discussed the relationship between the compliance assessments under CMM 2019-06 and the draft IUU vessel list. TCC19 agreed that the revised CMM on CMS was clear that compliance of individual vessels was not to be considered in the CMS process and that there was a need to separate these two processes. Some CCMs noted that there was a distinction between reporting that all the necessary legislative mechanisms are in place to implement an obligation, and the actual implementation of the obligation. For some obligations, the actual implementation was currently not assessed in the CMS. TCC19 agreed that discussion in the context of compliance verification (TCC19 Agenda Item 7) would be useful to capture other data sources that could be used to verify compliance. There was also the potential to raise such issues when discussing the aggregated tables." (Final CMR Adopted at WCPFC20, paragraph 33)

Verifying Transshipment Activities

59. 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](#)).
60. 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

¹⁹ [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.

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.

61. There is more detailed information related to the limitations on the current use of ROP data to support compliance reviews presented in TCC19 and TCC20 working paper 9.²⁰ The recently adopted ROP data fields may provide a regular source of observer data that can be used to cross-check reported transshipment events (see Annual Report on Transshipment (RP03)). The cross-checking will also identify necessary enhancements to data standards and the ability of an ROP to provide independent verification.
62. Proposals are being considered for improving the ability to better link catch and transshipment related information through the 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.

- | |
|---|
| <ol style="list-style-type: none">63. Due to current analytical and data limitations, the evaluations in the 2023 dCMR of various transshipment limit and reporting obligations were partially verified.64. 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

65. TCC20 is invited to provide advice and recommendation on approaches to strengthen independent verification of key obligations in future WCPFC compliance reviews, including through recommendations for further tasks to relevant intersessional working groups.

²⁰ [WCPFC-TCC19-2023-09](#) *Use of ROP data in the Compliance Monitoring Scheme* and this year's update [WCPFC-TCC20-2024-09](#)

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 and RY2023
<p>CMM 2023-01 24 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>Limit Type = Days - AR Pt2 - 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>Limit Type = Catch - AR Pt2</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 Pt2 information.</p>
<p>CMM 2023-01 25 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 Pt2 and the Secretariat can verify the CCM’s reported information and confirm that the allowable limit has not been exceeded.</p>	<p>Limit Type = Days - AR Pt2 - 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>Limit Type = Vessels - AR Pt2 - 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 and RY2023
<p><u>CMM 2023-01 43</u> Limit by flag on number of purse seine vessels >24m with freezing capacity between 20N and 20S</p>	<p>The CCM reported its number of CCM flagged PS vessels >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>	<p>- AR Pt2 - Aggregate summary of Commission data (WCPFC RFV, Fished and Did not Fish and VMS data)</p>	<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><u>CMM 2023-01 44</u> 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>	<p>- AR Pt2 - Aggregate summary of Commission data (WCPFC RFV, Fished and Did not Fish and VMS data)</p>	<p>[obligation not included in list for evaluation in dCMR prepared in 2023]</p>
<p><u>CMM 2023-01 45</u> 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>	<p>- AR Pt2 - 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))</p>	<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 and RY2023
<p><u>CMM 2023-01 46</u> 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"> - AR Pt2 - 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)) 	<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 and RY2023
<p><u>CMM 2006-04 01</u> 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 Pt2 - ACE Tables (reported catch by # vessels that operated in area S15S in RY) - CMM 2006-04 04 Required Report</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><u>CMM 2009-03 01</u> 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 Pt2 - AR Pt 1 CMM 2009-03 08 Required Report - 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><u>CMM 2015-02 01</u> 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 Pt2 - ACE Tables (# vessels that targeted SP ALB S20S in RY as reported in operational data) - CMM 2015-02 04 Required Report</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><u>CMM 2019-03 02</u> 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 Pt2 - ACE Tables (reported catch by vessels in Convention Areas north of equator in RY) - CMM 2019-03 03 Required Report</p>	<p>[obligation not included in list for evaluation in dCMR prepared in 2023]</p>
<p><u>CMM 2023-02 02</u> 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 Pt2 - ACE Table data (days fishing effort north of 20N in RY as reported in operational data) - Annual Report to NC CMM 2023-02 08 & 14 Required Report</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>
<p><u>CMM 2023-03 02</u> CCMs take measures to ensure fishing effort by fisheries taking > 200mt per year of NP SWO N20N is limited to 2008 – 2010</p>	<p>[Audit Point not yet agreed]²¹</p>	<p>- AR Pt2 - Annual Report to NC CMM 2023-04 Required Report</p>	<p>[obligation not included in list for evaluation in dCMR prepared in 2024]</p>

²¹ The Secretariat suggested for the Commissions consideration a draft Audit Point based on the template language of existing agreed audit points to WCPFC20 (see [WCPFC20-2023-20 Review of Billfish Conservation and Management Measures](#) pages 9-10).

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 and RY2023
<p>CMM 2009-03 02 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>	<p>- AR Pt2 - AR Pt 1 CMM 2009-03 08 Required Report - ACE Tables (reported catch of vessels that operated S20S in RY)</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>CMM 2010-01 05 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>	<p>- AR Pt2 CMM 2010-01 08 Required Report - ACE Tables (reported catch by vessels in Convention Areas north of equator in RY)</p>	<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>CMM 2023-01 38 As an interim measure, CCMs listed in Attachment 1, Table 3 shall restrict the level of bigeye catch to the levels specified in Table 3. Where the limits in Table 3 have been exceeded, any overage of the catch limit by a CCM listed in Table 3 shall be deducted from the catch limit for the following year for that CCM</p>	<p>[Audit Point not yet agreed]²² The Audit Point for CMM 2021-01 37 which was applied in the 2024 dCMR related to 2023 activities is “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>	<p>- AR Pt2 - ACE Tables - SPC and Secretariat prepared catch and effort data summaries (reported catch of LL vessels of bigeye tuna in RY) - Summary of CMM 2021-01 38 Required Report (monthly report)</p>	<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>CMM 2023-01 41 Bigeye longline catch limits by flag for certain other members which</p>	<p>CCM reported its total bigeye longline catch in its AR Pt2 and the Secretariat can verify the CCM’s reported catch</p>	<p>- AR Pt2 - ACE Tables</p>	<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</p>

²² [TCC20 working paper 15](#) discusses how in the short-term reviews of the requirements for increased longline observer coverage, set out in CMM 2023-01 Attachment 1, Table 3, could be supported.

Quantitative Limit Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2022 and RY2023
caught less than 2000t in 2004	level and confirm that it does not exceed 2,000mt.	- SPC and Secretariat prepared catch and effort data summaries (reported catch of LL vessels of bigeye tuna in RY)	applicable CCMs, the choice to apply IATTC measures in the overlap area between IATTC and WCPFC has been considered.
<u>CMM 2023-01 48</u> Limit on total catch of certain other commercial tuna fisheries (that take >2000Mt of BET, YFT and SKJ)	[Audit Point not yet agreed]	- AR Pt2 - ACE Tables - SPC and Secretariat prepared catch and effort data summaries (provides best available catch estimates for some CCMs fisheries)	[obligation not included in list for evaluation in dCMR prepared in 2023 or 2024]
<u>CMM 2023-02 03</u> Pacific bluefin tuna catch limits for Japan, Korea and Chinese Taipei applying from 2024	<u>CMM 2021-02 03:</u> 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.	- AR Pt2 - Annual Report to NC CMM 2023-02 08 & 14 Required Report	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.
<u>CMM 2023-02 04</u> Pacific Bluefin 30kg or larger catch limits, by flag for certain other members	<u>CMM 2021-02 04:</u> 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.	- AR Pt2 - Annual Report to NC CMM 2023-02 08 & 14 Required Report	ACE Table data of WCPFC key species in WCPFC-south and WCPFC-north in RY was used by WCPFC to verify compliance.

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 and RY2023
<p><u>CMM 2004-03 02</u> Fishing vessel marking and technical specifications</p>	<p>CCM submitted a statement in ARPt2 that: a. confirms CCM's implementation through adoption of a national binding measure that requires CCM flagged vessel operators to mark their vessels in accordance with the marking and technical specification requirements of paragraphs 2.1 and 2.2 CMM 2004-03. b. describes how CCM is monitoring and ensuring that its flagged vessels are marked in accordance with the marking and technical specification requirements of paragraphs 2.1 and 2.2 CMM 2004-03, and how the CCM responds to potential infringements or instances of non-compliance with the relevant requirement.</p>	<p>- AR Pt2</p>	<p>n/a - because the evaluations in dCMR prepared in 2024 were based on the adopted Audit Point.</p>
<p><u>CMM 2008-04 02</u> Measures necessary to prohibit use by their vessels of large-scale driftnets in the high seas</p>	<p>CCM submitted a statement in AR Pt2 that: a. confirms CCM's implementation through adoption of a national binding measure that prohibits CCM fishing vessels operating on the high seas in the Convention Area from using large-scale driftnets b. describes how it is monitoring its fishing vessels operating on the high seas in the Convention Area to ensure they are not using driftnets and how the CCM responds to potential infringements or instances of non-compliance with this requirement.</p>	<p>- AR Pt2</p>	<p>n/a - because the evaluations in dCMR prepared in 2024 were based on the adopted Audit Point.</p>
<p><u>CMM 2009-03 03</u> CCMs shall not shift their fishing effort</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</p>	<p>- AR Pt2 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>

Implementation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2022 and RY2023
for SWO to the area north of 20°S	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>CMM 2014-02 9a</p> <p>Fishing vessels comply with the Commission standards for WCPFC VMS including being fitted with ALC/MTU that meet Commission requirements</p>	<p>CCM submitted a statement in ARPt2 that:</p> <p>a. confirms CCM's implementation through adoption of a national binding measure that requires its flagged fishing vessels to comply with the Commission standards (contained in CMM 2014-02 and the VMS SSPs) for WCPFC VMS including being fitted with ALCs/MTUs that meet Commission requirements.</p> <p>b. describes how CCM is monitoring and ensuring that its flagged fishing vessels meet the Commission's VMS standards and requirements and how the CCM responds to potential infringements or instances of non-compliance with the relevant requirement.</p>	<p>- AR Pt2 Statement of Implementation</p> <p>- 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.</p> <p>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>
<p>CMM 2014-02 9a VMS SSPs 2.8</p> <p>VMS Provision of ALC/MTU 'VTAF' data</p>	<p>[Report] 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</p>	<p>- AR Pt2</p> <p>- Aggregate summary of Commission data (WCPFC VRST data, FFA report on daily position counts, FFA good standing records,</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</p>

Implementation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2022 and RY2023
	Albacore south of 20S, with catch levels reported by species groups.	WCPFC Fished and Did not fish reports)	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><u>CMM 2017-04 02</u> Prohibit fishing vessels from discharging any plastics (including plastic packaging, items containing plastic and polystyrene) but not including fishing gear</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 its fishing vessels from discharging any plastics (including plastic packaging, items containing plastic and polystyrene)</p> <p>b. describes how it is monitoring its fishing vessels to ensure they are not discharging plastics and how the CCM responds to potential infringements or instances of non-compliance with this requirement.</p>	<p>- AR Pt2</p>	<p>n/a - because the evaluations in dCMR prepared in 2024 were based on the adopted Audit Point.</p>
<p><u>CMM 2018-03 01, 02 and 08</u> Required longline mitigation measures to reduce incidental catch of seabirds applying north of 23N or south of 25S</p>	<p>Based on CCM identification of which mitigation measures are being applied to CCM vessels in the applicable relevant area, the CCM submitted a statement in AR Pt2 that:</p> <p>a. confirms CCM's implementation through adoption of a national binding measure that requires its flagged longline vessels to:</p> <p>i. use at least two mitigation measures in paragraph 1(a) or hook shielding devices when fishing south of 30°S</p> <p>ii. use one of the mitigation measures in paragraph 2 when fishing in area 25°S-30°S</p> <p>b. confirms CCM's implementation through adoption of a national binding measure that requires its flagged longline</p>	<p>- AR Pt2 Statement of Implementation and Required Report (CMM 2018-03 para 8)</p> <p>- ACE Tables</p> <p>- AR Pt 1</p>	<p>n/a - because the evaluations in dCMR prepared in 2024 were based on the adopted Audit Point. ACE tables were used to support checks of applicability.</p>

Implementation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2022 and RY2023
	<p>vessels fishing north of 23°N:</p> <p>i. 24m or more in overall length, to use at least two mitigation measures in paragraph 6, Table 1 CMM 2018-03, including at least one from Column A</p> <p>ii. less than 24m in overall length, to use at least one of the mitigation measures from Column A in Table 1, CMM 2018-03.</p> <p>b. describes how it is monitoring and ensuring its fishing vessels comply with seabird mitigation requirements in paragraphs 1,2 and 6 of CMM 2018-03 and how the CCM responds to potential infringements or instances of non-compliance with the relevant requirement.</p>		
<p><u>CMM 2018-04 06</u> 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:</p> <p>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>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>- AR Pt2 Statement of Implementation and Required Report (CMM 2018-04 para 2)</p>	<p>n/a - because the evaluations in dCMR prepared in 2023 were based on the adopted Audit Point</p>
<p><u>CMM 2018-04 07 (a, b)</u> Sea Turtle mitigation</p>	<p>CCM submitted a statement in AR Pt2 that:</p> <p>a. confirms CCM's implementation through adoption of a national binding</p>	<p>- AR Pt2 Statement of Implementation and Required Report (CMM 2018-04 para 2)</p>	<p>n/a - because in 2023 Secretariat inadvertently overlooked the third section of the Audit Point when preparing the dCMR in 2023.</p>

Implementation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2022 and RY2023
requirements for shallow-set longline vessels	<p>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>OR</p> <p>c. if the Secretariat confirms that paragraph 7a requirements do not apply because SC has accepted in accordance with paragraph 7b that the CCMs shallow-set longline fishery/ies has minimal observed interaction rates of sea turtles</p> <p>AND</p> <p>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>	- ACE Tables	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.

Implementation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2022 and RY2023
<p><u>CMM 2018-04 07d</u> CCMs to ensure vessels fishing in a shallow-set manner are required to report all incidents involving sea turtles</p>	<p>CCM submitted a statement in AR Pt2 that: a. confirms CCM's implementation through adoption of a national binding measure that requires its flagged longline vessels that fish in a shallow-set manner to record all incidents involving sea turtles during fishing operations and report such incidents to the appropriate national authorities. b. describes how CMM is monitoring and ensuring that its flagged longline vessels, that fish in a shallow-set manner, are recording record all incidents involving sea turtles during fishing operations and reporting such incidents to the appropriate national authorities, and how the CCM responds to potential infringements or instances of noncompliance with these requirements.</p>	<p>- AR Pt2 - ACE Tables</p>	<p>n/a - because the evaluations in dCMR prepared in 2024 were based on the adopted Audit Point. ACE tables were used to support checks of applicability.</p>

Implementation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2022 and RY2023
<p><u>CMM 2022-04 22 (01 - 03)</u> Prohibit retaining/transshipping/storing/landing oceanic whitetip & silky sharks as specified in CMM 2022-04</p>	<p>CCM submitted a statement in AR Pt2 that: 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 transshipment, upon which any surrendered OWT or SS may be donated for human consumption 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>	<ul style="list-style-type: none"> - AR Pt2 - 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>n/a - because the evaluations in dCMR prepared in 2023 were 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 and RY2023
<p><u>CMM 2009-06 29</u> 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 Pt2 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 Pt2 of the CCM's approach to implementation of the suspension from 20 April 2020 to 15 March 2022.</p>	<p>-AR Pt2 - 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><u>CMM 2009-06 34</u> 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 Pt2 - 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><u>CMM 2016-02 06</u> 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 Pt2 - 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 or 2024]</p>

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2022 and RY2023
<p><u>CMM 2009-06 11</u> 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 Pt2 - 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><u>CMM 2009-06 35 a (ii)</u> 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 Pt2 - RFV</p>	<p>The RFV updates of data field "HS Authorised to tranship at sea" were reviewed by the Secretariat</p>
<p><u>CMM 2009-06 35 a (iii)</u> 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 transshipment notification in respect of each CCM-authorized vessel in accordance with Annex III of CMM 2009-06 or WCPFC ER Standards for high seas transshipment.</p>	<p>- AR Pt2 - Summary of Commission data (high seas transshipment reports & # 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><u>CMM 2009-06 35 a (iv)</u> 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 Pt2 - Summary of Commission data (high seas transshipment reports & # 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>