



**TECHNICAL AND COMPLIANCE COMMITTEE
Twentieth Regular Session**

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Pohnpei, Federated States of Micronesia (Hybrid)

**Interim steps for evaluating increases in bigeye longline catch limits under CMM 2023-01
- A discussion paper**

WCPFC-TCC20-2024-15¹

6 August 2024

Submitted by Secretariat and SPC-OFP

Updates on SC20 discussions

1. In CMM 2023-01, the CMM for tropical tunas, China, Japan, Republic of Korea, Indonesia and Chinese Taipei may notify to increase up to 10% their annual bigeye longline catch limit, on the condition that they maintain 5% ROP coverage level and commit to a proportionate increase in observer coverage level - up to 10% which can be achieved by human observer and/or EM coverage (footnotes to [CMM 2023-01 Attachment 1, Table 3](#)).
2. During SC20, the Secretariat presented this paper with the stated purpose of providing information to support SC20 and TCC20 consideration of advice and recommendations to the Commission related to interim steps to support future reviews of requirements for increased observer coverage in longline fisheries, commencing in 2025. In 2024, notifications to increase their bigeye longline catch limit were received from the Republic of Korea and Chinese Taipei. The information in the paper recognises the current stage of development of WCPFC's EM program and suggests that any interim approaches to support compliance reviews of requirements for increased observer coverage in longline fisheries commencing in 2025, should build on current practice and not pre-empt the outcomes of ERandEM IWG deliberations. It is suggested that agreement on updated audit points will be necessary to support CMR assessments in 2025, and to this end interim additional reporting requirements are recommended for relevant Members, which includes their plan to achieve the observer coverage over and above the minimum 5% ROP observer coverage rate; and a supplementary report in AR Pt1, to the current CMM 2018-05 Annex C 06 (RP) which reports the observer coverage achieved over and above the minimum 5% ROP observer coverage rate. Draft revised Audit Points are also provided in Annex 1 Table 2 on [SC20-ST-WP-09](#) pg 8. Lastly, the paper requests that SC20 reviews the merits of the points listed

¹ This paper was submitted to SC20 as SC20-ST-WP-09 [Interim steps for evaluating increases in bigeye longline catch limits under CMM 2023-01 - A discussion paper](#) – 6 August 2024. The cover note was circulated for TCC20 on 17 September 2024.

in paragraph 17 of the paper which are intended to support WCPFC's consideration of interim data submission standard for EM that is "equivalent" to 5% ROP Observer Coverage rate.

3. SC20 discussed the paper under SC20 Agenda item 3.4.2, but did not record a specific outcome or decision on this matter. The key points raised in the discussions at SC20 included:
 - a. FFA Members noted that while coverage up to 5% must be provided by ROP observers, coverage above 5% can be achieved through either ROP observers or Electronic Monitoring (EM). FFA Members said they would appreciate further clarification from the two CCMs, Korea and Chinese Taipei, on how the two CCMs plan to meet the observer coverage requirement above 5%, and to confirm that their EM program captures all ROP Minimum Standard Data Fields and if not, how these data gaps will be addressed.
 - b. Korea confirmed their intent to conduct an EM project on at least two longline vessels this year although the overall process is somewhat delayed from what we originally planned. For 2024, we basically intend to achieve 10% coverage by human observers only, noting the uncertainties around the EM minimum standards at the moment. However, in the event that we cannot achieve the coverage by human observers due to unforeseen events, we may seek to include some of our EM results in the coverage, provided that the EM minimum standards and a clear process for inclusion in the LL observer coverage are agreed no later than the end of this year.
 - c. Chinese Taipei confirmed that the 2024 bigeye catch limit of their longliners would be increased by 2%, and they commit to collective observer coverage of longliners in the WCPO, combining LTLL and STLL, will be increased by 5% to 6% by the end of 2024.
 - d. FFA Members, while acknowledging that CMM 2023-01 allows for increased observer coverage above 5% to be sourced from ROP or EM, FFA Members position is that, in the absence of an agreed-upon framework for EM, the interim solution is to default to coverage solely by ROP observers. This approach should be maintained while the Commission works out the details related to EM, and it is seen as the most straightforward interim solution, at least for 2024, and possibly extending into 2025 if necessary. Under this interim solution, the Annual Report Part 1 reporting requirement and the Secretariat's verification could be a simple extension of the current Audit Point where it would require that the Secretariat verify, through ROP data received by WCPFC, that the CCM did meet the appropriate minimum observer coverage rate for its flagged longline vessels. In essence, the assessment during the CMS process would utilize the existing Audit Point. FFA Members do not view this interim solution of defaulting solely to ROP human observers as an unreasonable expectation, particularly for the two CCMs who have notified their intention to increase their longline bigeye catch this year. As evidenced by Table 4 of ST-IP03², both CCMs achieved ROP observer coverage of over 10% in 2023, as well as in some previous years. This interim solution is deemed necessary to allow the Commission to properly develop the details related to EM and the associated Audit Points, without rushing the process. In addition to this interim solution, we suggest that CCMs capable of doing so be encouraged to voluntarily submit EM data where possible, ideally in accordance with the guidance provided in paragraph 17 of this paper. This will aid the work of the ER and EM Working Group, particularly in determining the EM data requirements. Furthermore, we propose that the information provided in paragraph 17 of the paper ST-WP-09 and the potential revised Audit Points be considered

² [TCC20-2024-IP03](#) *Status of observer data management*

in parallel with the discussion of the EM data requirements at the various relevant fora - including at the ERandEM WG and TCC.

- e. Japan noted that it is expected that this is a short-term matter, it is expected that the EM standards were to be agreed in the very near future. Japan encouraged members to provide information and data as soon as possible and to the best of their ability, for relevant trips.
4. These notes are presented for the information of TCC.



**SCIENTIFIC COMMITTEE
TWENTIETH REGULAR SESSION**

Manila, Philippines
14 – 21 August 2024

**Interim steps for evaluating increases in bigeye longline catch limits under CMM 2023-01
- A discussion paper**

**WCPFC-SC20-2024\ST-WP-09¹
6 August 2024**

Prepared by the Secretariat and SPC-OFP

Purpose

1. The purpose of this paper is to provide information to support SC20 and TCC20 consideration of advice and recommendations to the Commission related to interim steps to support future reviews of requirements for increased observer coverage in longline fisheries as is set out in CMM 2023-01 Attachment 1, Table 3.

Background

2. The footnotes to [CMM 2023-01 Attachment 1, Table 3](#) provide opportunities for certain CCMs² to notify that they will increase their bigeye longline catch limit by committing to a proportionate increase in observer coverage level (e.g., observer + Electronic Monitoring (EM)) above the minimum 5% ROP coverage level.
3. The option for certain CCMs to increase bigeye longline catch limits under CMM 2023-01 originated from a WCPFC20 delegation proposal from PNA and Tokelau to amend CMM 2021-01 ([WCPFC20-2023-DP04](#)). The PNA and Tokelau proposal conditioned any agreement for increased longline bigeye catch limits on increasing longline monitoring either by observers or electronic monitoring to a 30% coverage level. The text of the footnotes to [CMM 2023-01 Attachment 1, Table 3](#) (which is shown in the box on the next page) represents a negotiated outcome, within the package of obligations that

¹ This paper, with a cover providing notes on any discussion and outcomes during SC20 will be posted as [WCPFC-TCC20-2024-15](#).

² In accord with CMM 2023-01, China, Japan, Republic of Korea, Indonesia and Chinese Taipei are provided the opportunity in 2024 – 2026, to notify an increase their annual bigeye longline catch limit. The United States annual bigeye longline catch limit was increased as part of the negotiation of CMM 2023-01, so no further catch increase is allowed.

were agreed by the Commission as CMM 2023-01, the Tropical Tuna CMM. For ease of reference, the below box contains the obligation language with the relevant footnote text:

Excerpt from CMM 2023-01 paragraph 38

LONGLINE FISHERY

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.

Footnotes to Attachment 1, Table 3

For the United States and those who maintain a 5% observer coverage level, no catch increase is allowed.

Any increase in BET tuna catch limit, up to 10%, by a CCM in table 3 shall correspond with a proportional increase of observer coverage, (eg observer + Electronic Monitoring (EM) coverage increases from 5% to 10%; and for example, a 2.5 percentage point increase in observer + EM coverage corresponds with a 5% increase in the catch limit; and a 5 percentage point increase in observer + EM coverage corresponds with a 10% increase in the catch limit.) A minimum level of 5% ROP coverage shall be maintained.

Any CCM who wants such an increase shall notify the Secretariat by the end of February of the year of fishing operations. If such CCM fails to achieve the required observer coverage level assessed for the year of increase of catch limits, then it will be subject to a payback penalty of 110% of the increased portion of the catch limit that can be repaid in either of the next two years, and will be assigned a status of priority non-compliant through the CMR process for this obligation.

Any observer coverage above 5% can be achieved by human observer and/or EM coverage

2024 Notifications Received

4. In 2024, two notifications have been received by the Secretariat which indicates that the relevant Member will apply the option set out in footnotes to CMM 2023-01 Attachment 1, Table 3 and will increase their bigeye longline catch limit in 2024 by committing to a proportionate increase in observer coverage level (e.g., observer + Electronic Monitoring (EM)) above the minimum 5% ROP coverage level). The Members who notified in 2024 are:
 - **Republic of Korea** – to increase its bigeye tuna catch limit by 10% in 2024, through achieving the necessary increase in observer coverage with human observer and EM coverage.
 - **Chinese Taipei** - to increase its bigeye tuna longline catch limit by 2% in 2024, with a commitment to increase collective observer coverage by the end of 2024 from 5% to 6%.
5. The Secretariat has published adjusted bigeye longline catch limits for these two Members in 2024 on the WCPFC website Monitoring and Evaluation – incorporating CMMs site, with notes that reflect the

notification received from the relevant Member (see [CMM 2023-01 38](#)).³ This, together with the cumulative monthly bigeye catch reporting from these two Members, is summarized in Table 1 below:

Table 1: Summary of adjustments to bigeye longline catch limits in 2024 for Republic of Korea and Chinese Taipei based on their notifications to WCPFC in accordance with CMM 2023-01 paragraph 38, and summary of their monthly bigeye longline catch reporting - as of 4 August 2024

	CMM 2023-01 Att 1 Table 3 longline bigeye catch limit (CMM 2018-05 Annex C 06 minimum ROP coverage rate)	2024 adjusted longline bigeye catch limit (adjusted minimum longline observer coverage, including 5% ROP coverage)	Cumulative Monthly reporting (1 Jan – 30 Jun 2024)
Republic of Korea	13,942 MT (5%)	15,336 MT (10%)	8,212 MT
Chinese Taipei	10,481 MT (5%)	10,691 MT (6%)	5,093 MT

Information to support interim TCC assessments in 2025

- The footnotes to CMM 2023-01 Attachment 1 Table 3, tasks TCC to recommend to the Commission “a status of priority non-compliant through the CMR process” for the bigeye longline catch limit assessment for a CCM, if the review of the dCMR indicates that the CCM failed to achieve the required observer coverage level assessed for the year of increase in catch limits.
- The Commission has audit points that will be used by TCC20 (in 2024) to support CMR assessments of the bigeye longline catch limit and 5% ROP observer coverage requirements (related to activities in the 2023 reporting year).⁴ However, the Commission is yet to agree updated audit points for the adjusted and new provisions of CMM 2023-01. Agreement on audit points will be necessary to support CMR assessments in 2025. TCC and the Commission should prioritize the adoption of updated audit points to support the CMR assessments of the bigeye longline catch limits applying under CMM 2023-01 paragraph 38 in 2024 and beyond. Furthermore, the audit points should appropriately consider the information that might be required to support the option set out in the footnotes in Attachment 1 Table 3 (for those Members that notify their intention is to increase the bigeye longline catch limit).
- The next three sub-sections discuss points that may be relevant to the development of revised audit points, and **Annex 1 Table 2** on page 8 of this paper, presents draft revised Audit Points which considers these discussions.

[Linkages to 2024 work to develop WCPFC interim Electronic Monitoring \(EM\) Standards](#)

- Currently WCPFC’s ERandEM IWG is progressing work to develop SSPs for EM and the Commission has agreed to adopt the EM SSPs as interim standards at WCPFC21 in December 2024. The ERandEM

³ Information pertaining to quantitative limits, agreed Audit Points and risk-based assessments, are all published on the Monitoring and Evaluation, incorporating CMMs, section of the WCPFC website (<https://cmm.wcpfc.int/>).

⁴ See **Annex 1 Table 2** middle column, on page 8 of this paper

IWG Chair has tabled a paper for review and discussion by SC20: *Development of interim Electronic Monitoring (EM) standards for WCPFC* ([SC20-ST-WP-05](#)). Although the work to develop SSPs for EM is on track to meet the Commission's agreed target, there may be additional work to finalise beyond December 2024. It is also expected that additional work will be needed to define WCPFC EM data requirements, agree on the assurance procedures that will support operation of EM programs within the WCPFC, and for the development of an EM CMM.

10. Because EM data analysis takes time, if one or more of the relevant Members does intend to use EM to meet the increase in observer coverage level in 2024, it would be necessary for SC20 and TCC20 to also provide recommendations and advice to the Commission about the information and data that the relevant Member is expected to submit to the Secretariat and SSP to support preparation of the dCMR in July 2025. This clarity is important to ensure that the 2025 CMS process (covering 2024 activities) has sufficient information and a common understanding of the evaluation criteria that will be used to support verified assessments by TCC of whether "*the required observer coverage level assessed for the year of increase of catch limits*" was met by the relevant Members in 2024.
11. Noting that we are currently in the middle of developing WCPFC's EM program through intersessional work led by the ER and EM WG, any guidelines for reporting and/or audit points adopted by the Commission in December 2024 would necessarily be an interim option that builds on current practice and is not intended to pre-empt the outcome of ERandEM IWG deliberations.

[Establish interim annual reporting requirements to support TCC CMR assessments](#)

12. A potential interim approach for Members who are opting to increase their bigeye longline catch limit is that those Members be required to provide information to WCPFC related to:
 - a. their plan to achieve the observer coverage over and above the minimum 5% ROP observer coverage rate; and
 - b. a supplementary report in AR Pt1, to the current **CMM 2018-05 Annex C 06 (RP)** which reports the observer coverage achieved over and above the minimum 5% ROP observer coverage rate.
13. This might be achieved through the Commission agreeing, as an interim approach, to additional reporting requirements which apply only to Members who opted to increase their bigeye longline catch limit. The reports should be referenced in the updated versions of the Audit Points that would task the Secretariat to verify that the reports have been received. TCC would review both the plan and the report in AR Pt1 when considering if the relevant Member has met or has "*failed to achieve the required observer coverage level assessed for the year of increase of catch limits.*"
14. In the case of increased observer coverage being achieved solely through a proportionate increase in the observer coverage level, the AR Pt1 reporting requirement and the Secretariat's verification could be a simple extension of the current Audit Point. It would require that the Secretariat verify, through ROP data received by WCPFC, that the CCM did meet the appropriate minimum observer coverage rate for its flagged, non-PS vessels.
15. However, in the case of EM, the reporting requirements would necessarily need to be an interim approach that builds on current practice, to simply provide a level of information to support TCC CMR assessments and which does not pre-empt the outcome of ERandEM IWG deliberations. The interim approach would recognize that EM data analysis takes time and that the current stage of development of WCPFC's EM program means that more work is needed to define what data should be provided

from each national or subregional EM program to meet the Commissions monitoring goals. Some options for metric of coverage based on past reporting practices could include:

- a. % coverage of vessels/trips by EM, with minimum review rate based on sets (similar to how Australia's EM program coverage is reported in the annual Status of Observer data Management paper prepared by SPC-OFP([WCPFC-SC20-2024/ST-IP03](#)));
- b. % coverage of trips by EM (similar to Pacific Islands program coverage is reported in Status of Observer data Management prepared by SPC-OFP ([WCPFC-SC20-2024/ST-IP03](#)));
- c. % coverage days at sea (which is the metric chosen by Korea and Chinese Taipei for annual ROP Observer Coverage reporting in AR Pt1); or
- d. consideration might also be given to an option that has greater "equivalence" for 5% ROP Observer Coverage Rate.

16. The latter option is further considered in the next section.

[Guidance for an interim data submission standard for EM that is "equivalent" to 5% ROP Observer coverage rate](#)

17. If the Commission were to favor applying, on an interim basis, a standard for EM coverage that has some equivalence to the standard used by TCC to assess the minimum 5% ROP Observer coverage rate, then this might be expected to require that the EM data generated by CCMs would need to be consistent with the established ROP minimum standard data fields and the ROP CMM. It is suggested that an interim approach would be to:

- a. Request that relevant Members generate as many of the established ROP minimum standard data fields from EM as possible, and to provide an explanation (from their point of view) as to why certain fields from these ROP standards cannot be collected. This list then also has the benefit of adding potential consistency with the interim approach proposed by the ERandEM IWG Chair and could be used in future discussions on establishing the WCPFC EM standards.
- b. Require that the format of submissions for EM data is the same as for CCM ROP submissions (e.g., same Excel format even if some fields are missing) or via the WCPFC [ER Standards for observer data and logbooks](#) adopted in 2018. This would facilitate the data entry of the EM data into existing WCPFC databases.
- c. Include a strong expectation that key ROP data fields must be generated from EM, such as all species catch events in the set, positions for start/end setting and hauling, etc.
- d. Reiterate that the directives within the ROP CMM would be relevant for EM data in the interim, including:
 - i. EM data should be generated from all fishing sets and all catch events within the trip;
 - ii. For compliance purposes, coverage would be determined based on the generated EM data received by the SSP (and not simply the calculation by the CCM), as per ROP data.

- e. Require that the relevant CCM would provide a report in AR Pt 1, of EM coverage achieved, which is based on one of the four metrics for reporting ROP coverage (Number of hooks, Number of Trips, Numbers of Days at Sea or Days Fished), and
- f. Require that if the EM data provided is a subset of the full trip, information about the approach used to subsample the raw footage must be provided. This would support future considerations through the ERandEM IWG to define a trip for the purpose of EM data, because the embarkation and disembarkation of observers will not be available to split trips and so new standards for defining trips may be needed to support splitting of EM data (port to port or to/from ports and/or transshipment events).

Proposed revisions to relevant Audit Points (for the interim period?)

- 18. The left column of **Annex 1 Table 2** lists the audit points that will be used by TCC20 (in 2024) to support CMR assessments of the bigeye longline catch limit and 5% ROP observer coverage requirements (related to activities in the 2023 reporting year). The right column in **Annex 1 Table 2** provides suggested revisions to the Audit Point, which considers the points that were discussed in the previous section.
- 19. Noting that intersessional work led by the ER and EM IWG, is continuing to develop WCPFC's EM program, any guidelines for reporting and/or revised audit points adopted by the Commission in December 2024 would necessarily be an interim approach that builds on current practice and is not intended to pre-empt the outcome of ERandEM IWG deliberations.

Recommendations

- 20. SC20 is invited to consider the matters raised in this paper and to provide advice and recommendations to the Commission which could support the establishment of interim guidelines and audit points for CMR assessments of requirements for increased observer coverage in longline fisheries as is set out in CMM 2023-01 Attachment 1, Table 3.
- 21. SC20 is also invited to review the merits of items (a. to f.) listed in paragraph 17 page 5 of this paper, which is reproduced below for ease of reference.

- 17. If the Commission were to favor applying, on an interim basis, a standard for EM coverage that has some equivalence to the standard used by TCC to assess the minimum 5% ROP Observer coverage rate, then this might be expected to require that the EM data generated by CCMs would need to be consistent with the established ROP minimum standard data fields and the ROP CMM. It is suggested that an interim approach would be to:
 - a. Request that relevant Members generate as many of the established ROP minimum standard data fields from EM as possible, and to provide an explanation (from their point of view) as to why certain fields from these ROP standards cannot be collected. This list then also has the benefit of adding potential consistency to the interim approach proposed by the ERandEM IWG Chair and could be used in future discussions on establishing the WCPFC EM standards.
 - b. Require that the format of submissions for EM data is the same as for CCM ROP submissions (e.g., same Excel format even if some fields are missing) or via the WCPFC [ER](#)

[Standards for observer data and logbooks](#) adopted in 2018. This would facilitate the data entry of the EM data into existing WCPFC databases.

- c. Include a strong expectation that key ROP data fields must be generated from EM, such as all species catch events in the set, positions for start/end setting and hauling, etc.
- d. Reiterate that the directives within the ROP CMM would be relevant for EM data in the interim, including:
 - i. EM data should be generated from all fishing sets and all catch events within the trip;
 - ii. For compliance purposes, coverage would be determined based on the generated EM data received by the SSP (and not simply the calculation by the CCM), as per ROP data.
- e. Require that the relevant CCM would provide a report in AR Pt 1, of EM coverage achieved, which is based on one of the four metrics for reporting ROP coverage (Number of hooks, Number of Trips, Numbers of Days at Sea or Days Fished), and
- f. Require that if the EM data provided is a subset of the full trip, information about the approach used to subsample the raw footage must be provided. This would support future considerations through the ERandEM IWG to define a trip for the purpose of EM data, because the embarkation and disembarkation of observers will not be available to split trips and so new standards for defining trips may be needed to support splitting of EM data (port to port or to/from ports and/or transshipment events).

Annex 1 Table 2: Current Audit Points and possible revised Audit Points which could be applied on an interim basis to support TCC CMR assessments of CMM 2023-01 until the Commission’s EM program and data standards are more fully developed.

	Current Audit Points (applying in 2023)	Possible revised Audit Points (applying from 2024)
Bigeye longline catch limit	<p>CMM 2023-01 37 (QL) <i>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.</i></p>	<p>CMM 2023-01 38 (QL) a. <i>The CCM reported its total bigeye longline catch in its AR Pt2 and the Secretariat can verify the CCM’s reported catch level <u>and where applicable, any allowed increase</u>, and confirm that the allowable limit has not been exceeded.</i> b. <i>The Secretariat confirms receipt by the CCM who notified that they <u>would increase their bigeye longline catch limit by committing to a proportionate increase in observer coverage level, of</u></i> i. <i><u>a plan to achieve the observer coverage over and above the minimum 5% ROP observer coverage rate; and</u></i> ii. <i><u>a report in AR Pt1 related to the additional observer coverage achieved for the previous year, above the minimum 5% ROP observer coverage rate.</u></i></p>
ROP 5% Observer coverage	<p>CMM 2018-05 Annex C 06 (RP) a. <i>The Secretariat confirms receipt by the CCM in AR Pt1 of the required information contained in WCPFC11 reporting procedure of previous year longline observer coverage achieved using the chosen metric and in the agreed format.</i> b. <i>The Secretariat can verify, through ROP data received by WCPFC, that the CCM did meet the minimum observer coverage rate of 5% for its flagged, non-PS vessels</i></p>	<p>CMM 2018-05 Annex C 06 (RP) a. <i>The Secretariat confirms receipt by the CCM in AR Pt1 of the required information contained in WCPFC11 reporting procedure of previous year longline observer coverage achieved using the chosen metric and in the agreed format, <u>and for each CCM who notified that they would increase their bigeye longline catch limit by committing to a proportionate increase in observer coverage level, of a report AR Pt1 of additional observer coverage (eq observer coverage + EM) achieved for the previous year, which is above the minimum 5% ROP observer coverage rate, and</u></i> b. <i>The Secretariat can verify, through ROP data received by WCPFC, that the CCM did meet the minimum observer coverage rate of 5% for its flagged, non-PS vessels <u>and any additional observer coverage (eq observer coverage + EM) achieved.</u></i></p>
