



**TECHNICAL AND COMPLIANCE COMMITTEE**

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**SUPPLEMENT TO ANNUAL REPORT ON THE REGIONAL OBSERVER PROGRAMME (ROP)  
PROVIDING SUMMARY INFORMATION RELATED TO ROP-BASED CCFS CASES**

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**WCPFC-TCC21-2025-RP02\_suppl**

**11 September 2025**

**Submitted by the Secretariat**

### **Purpose**

1. This paper presents an annual summary of information related to Compliance Case File System (CCFS) cases that are based on Regional Observer Programme (ROP) data. It supplements TCC21-2024-RP02 on the Annual Report on the Regional Observer Programme and is an update of [TCC20 working paper 09](#).
2. Additional information related to the matter of ongoing cases is provided in [TCC21 working paper 08](#). An update on the scheme to address the imbalance in the CCFS is provided in [TCC21 working paper 09](#).

### **Background**

3. The ROP was established pursuant to Article 28 of the Convention “to collect verified catch data, other scientific data and additional information related to the fishery from the Convention Area and to monitor the implementation of the conservation and management measures adopted by the Commission.” The ROP has at its core, the collection of independent, verified catch and scientific data at-sea which can also be used for compliance purposes in monitoring CCMs’ implementation of CMMs.
4. The ROP is based on the use of the regional, subregional, and national observer programmes of its members. Operational rules for the ROP are set out in [CMM 2018-05](#). The TCC and the Scientific Committee (SC) have a joint responsibility to recommend the priorities and objectives of the ROP to the Commission and to assess the results of the programme (Convention Articles 12 (2f) and 14(2c)).
5. The current required observer coverage rates are:

- Purse seine vessels 20N and 20S: 100% observer coverage ([CMM 2023-01](#) paragraphs 32 and 33).
  - Longline vessels: a minimum rate of 5% ROP observer coverage ([CMM 2018-05](#), Annex C paragraph 6) and the option provided to certain flag CCMs in the tropical tuna CMM to increase bigeye longline catch limits by committing to increased observer coverage.
  - Transshipments-at-sea: a minimum rate of 100% ROP observer coverage with the observer usually deployed on the receiving vessel ([CMM 2009-06](#), paragraph 13).
6. The Commission has adopted [WCPFC ROP Minimum Standard Data Fields](#) and ROP-authorized Programmes are expected to ensure that their programme's observers collect these data during each placement involving WCPFC longline and purse seine ROP trips. The Commission at WCPFC19 in December 2022 adopted new [Minimum Data Fields for Observer Transshipment Monitoring](#) as data fields to be collected by transshipment observers during transshipment events and provided to the Commission as of 1 April 2023. ROP Observer Providers can determine the best format for collection of the WCPFC minimum data fields.
  7. Since 2016, the Commission has provided additional guidance relevant to ROP data collection and submission through the WCPFC Standards, Specifications and Procedures for Electronic Reporting in the WCPFC – covering operational catch and effort data + observer data ([ER Standards for observer data and logbooks](#)). These Standards also incorporate the SPC/FFA harmonised data fields that are used by many observer programmes and include notes to clarify which observer data fields are agreed as WCPFC ROP Minimum Standard Data Fields (WCPFC Field = Y) and which are not presently included (WCPFC Field = N). Consequently, some observers during a ROP trip may record additional observer data and some supplementary notes, for example in their observer journal, but as these are not defined as ROP data (WCPFC Field = N), they are not available for use by the Secretariat in the CMS.
  8. WCPFC receives observer data management services through its Scientific Services Provider contract with the Pacific Community – Oceanic Fisheries Programme (SPC-OFP). SPC-OFP also supports its member Pacific Island countries and territories with observer data management, and as a result there is centralized and harmonised observer data processing and management in the WCPO. In accordance with WCPFC rules, SPC will consider observer data to be WCPFC ROP data if the activity of a fishing vessel during a trip meets the definition of being a ROP-defined<sup>1</sup> trip. For ROP-defined trips, the data fields that correspond to WCPFC ROP Minimum Standard Data Fields will be considered WCPFC ROP data. [SC21-ST-IP-05](#) overviews SPC's observer data management for WCPFC.

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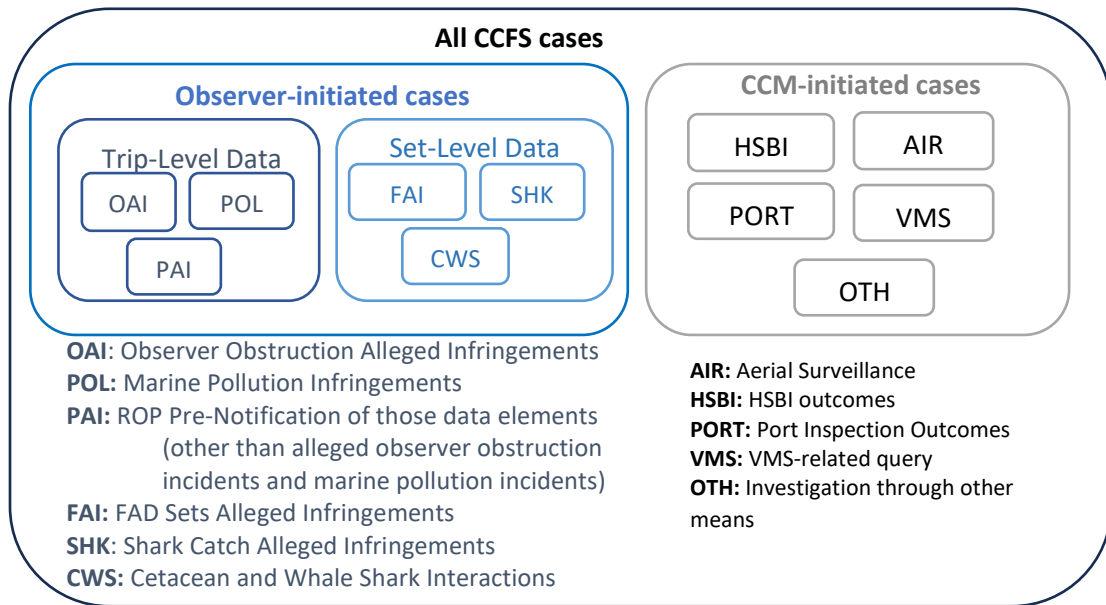
<sup>1</sup> [CMM 2018-05](#) paragraph 5: Scope of the Commission ROP

5. *The Commission ROP shall apply to the following categories of fishing vessels authorized to fish in the Convention Area in accordance with the Commission's Conservation and Management Measures 2004-01:*

- i) vessels fishing exclusively on the high seas in the Convention Area, and*
- ii) vessels fishing on the high seas and in waters under the jurisdiction of one or more coastal States and vessels fishing in the waters under the national jurisdiction of two or more coastal States.*

## Use of ROP data in the Compliance Monitoring Scheme (CMS)

9. The primary use of ROP data in the CMS to date has been as an independently collected data source which once available to the Secretariat, provides the basis for seeking clarification and requesting investigations by flag CCMs of potential alleged infringements by their vessels. The initial exploration of this use for ROP data in the CMS commenced in 2014/15 when the Secretariat provided supporting files to relevant CCMs based on ROP data.
10. In April 2016, the Secretariat launched the Compliance Case File System (CCFS) with the requirement of providing the Secretariat with a mechanism for the structured and centralized recording of correspondence related to potential alleged infringements of CCMs. As such, the CCFS was originally a tool to support the Secretariat's delivery of tasks under the CMS. However, the eventual design of the CCFS included allowing relevant CCMs to view "cases" and to submit information that they considered relevant to a case. In early 2022, the Secretariat launched an upgraded CCFS with the aim of continuing to enhance and improve the ease of use of the system. The Secretariat continues to welcome CCM's feedback on their experiences with using the CCFS.
11. In recent years, the CMS CMM ([CMM 2023-04](#)) has elaborated the purpose of the CCFS, and currently the stated purpose is that the CCFS is to be maintained "*as a secure, searchable system to store, manage and make available information to assist CCMs with tracking alleged violations by their flagged vessels.*" The measure also confirms which CCMs should have access to a case, directs that notifications should be sent when new cases are created, and guides what the aggregated summary tables generated from the CCFS should contain and what information flag CCMs are to provide in response to each case related to their vessels. In accordance with these rules, and where applicable, ROP observer providers, coastal CCMs, and chartering CCMs can view and provide responses to relevant cases through the CCFS.
12. There are two main groups of cases in the CCFS, which are differentiated by the way that cases are initiated:
  - Observer-initiated cases are cases that are created by queries against the fields in the WCPFC ROP data. Observer-initiated cases may be further grouped based on whether the ROP data is collected on the WCPFC Observer Trip Monitoring Summary (Trip Level Data) or collected based on vessel activity, set-type, species codes and/or fate codes (Set Level Data). There are currently six types of Observer-initiated cases, and data in the CCFS commences from 2015/16.
  - CCM-initiated cases (or Article 25(2) cases) are for alleged infringements in which a flag State investigation has been requested by a WCPFC member, in accordance with Article 25(2) of the Convention. These cases are created by the Secretariat individually, based on email communications from one CCM to another CCM to request an explanation or investigation into the conduct of its vessel and/or its nationals. Data commences from 2013.
13. The groupings and subgroupings are illustrated in **Figure 1** below. Snapshot summaries are included in the next section of the paper which provides further detail about each of the six current Observer-initiated case types and their linkage to reviews of CMM obligations.



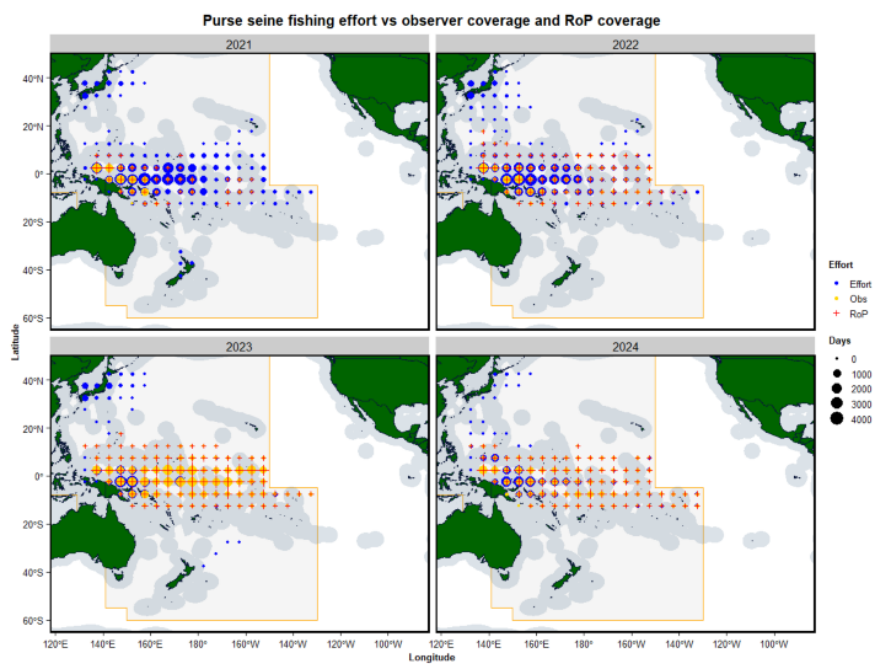
**Figure 1:** Schematic diagram of current CCFS case types, to illustrate the groupings based on how a case is initiated, and within the Observer initiated group whether the ROP data is based on the observer trip monitoring summary or is based on set-level (operational) data.

14. The CCFS is periodically updated with new cases derived from ROP data, according to procedures established by the Secretariat and the SPC-OFP, who oversee the management of WCPFC scientific data holdings. SPC-OFP prepares an annual report for SC and TCC on *Status of Observer Data Management* ([SC21-ST-IP-05](#)) which includes the status of observer data entry, observer data provisions, and information on ROP coverage levels currently achieved across WCPFC fisheries.
15. In the past, the frequency of updates was primarily constrained by the frequency with which the SPC-OFP could provide ROP data to the Secretariat; but more recently the primary constraint has become the availability, within the Secretariat, of IT professionals capable of loading this data and of Compliance staff to review and check draft cases created from the ROP data. This can lead to delays between the “event year” of an observer-initiated case and the date of notification for that case. For the last couple of years, an update has occurred every three to six months. The current work of the ROP-IWG on streamlining the process for cases derived from ROP data to be provided to the Commission is aimed at supporting more frequent updates of CCFS based on ROP data. (Refer to [WCPFC-TCC21-2025-17B](#))
16. The Commission is currently progressing work to refine WCPFC’s monitoring programs through its intersessional working groups. The [ROP-IWG](#) has a [2024 – 2026 workplan](#) that prioritizes the review and development of draft recommended modifications to ROP data fields with the intention of allowing for more useful consideration of ROP data in the CCFS and in the Compliance Monitoring Scheme processes ([TCC21 working paper 17](#)). The [ERandEM-IWG](#) is also progressing work to establish E-monitoring as a tool to meet WCPFC’s data needs ([TCC21 working paper 21](#)). The range of IWG-led work to refine WCPFC’s

monitoring programs is expected to improve the representation of data for use in the CMS, including in the CCFS.

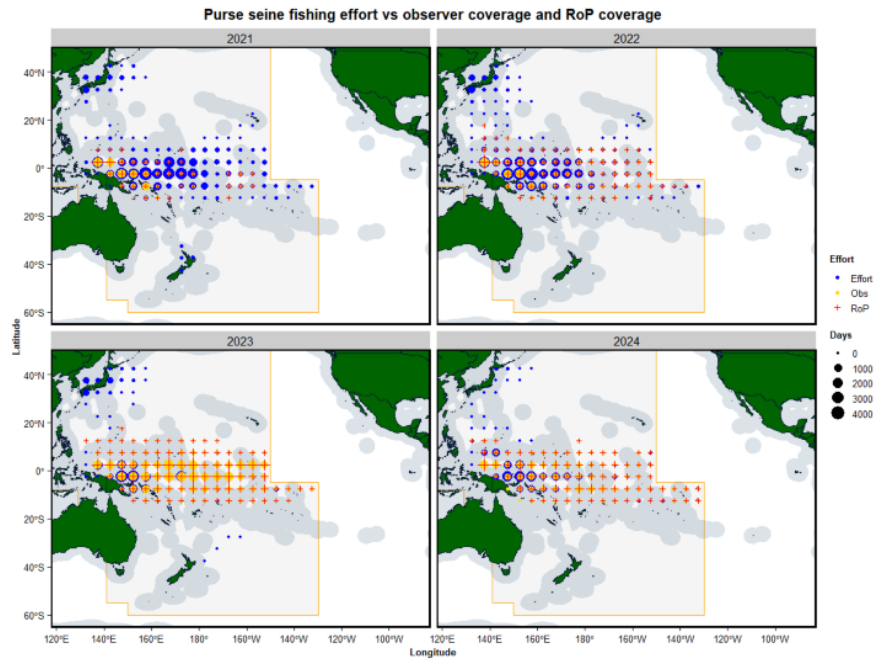
### Summary information on observer-initiated cases in the CCFS

17. The information presented in this section of the paper draws from work in the Secretariat supported by two analytical consultancies during 2023 – 2025, and specifically work to develop a comprehensive set of aggregated tables based on CCFS data. Following the approach used in 2024, this year's update also presents certain figures that are based on the results of the subsampling approach,<sup>2</sup> these figures have light blue shading to assist in distinguishing from the complete CCFS dataset. Note that the CCFS dataset is based available ROP data as of November 2024 and CCM replies to CCFS cases that had been reviewed by the Secretariat as at the 26<sup>th</sup> August 2025.

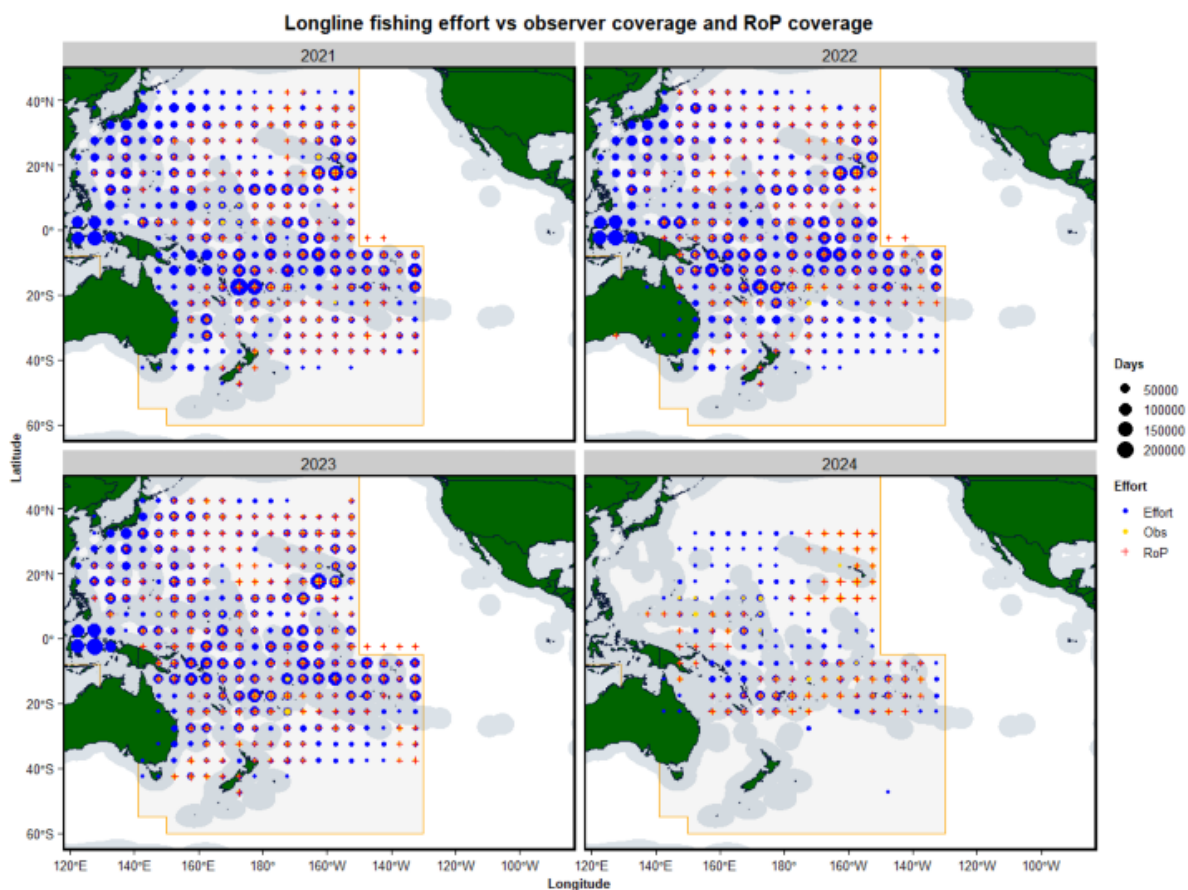


- 18.
19. **Figure 2** and **Figure 3**, below, illustrate the expected bias in ROP observer coverage compared to actual effort. Due to the long-established WCPFC mandate of 100% observer coverage on purse seine vessels, compared to a minimum requirement of 5% ROP coverage on longline vessels, it is expected that the proportion of fishing effort monitored by observers is significantly higher for purse seine operations than for longline operations.

<sup>2</sup> The CMS CMM ([CMM 2023-04](#)) was amended by the Commission at WCPFC20 with the inclusion of paragraph 15(b) that tasks the Secretariat to develop and utilize, in consultation with the Scientific Services Provider, a scheme for randomly sampling observer-related cases from the online compliance case file system for the purse seine fishery on a trip basis designed to achieve the level of coverage in the CMR for ROP purse seine trips determined for the longline fishery by the Scientific Services Provider for the most recent year for which this data is available. An update on this task is provided in [TCC21 working paper 09](#).



**Figure 2:** The distribution of purse seine fishing effort and observer effort for 2021-2024



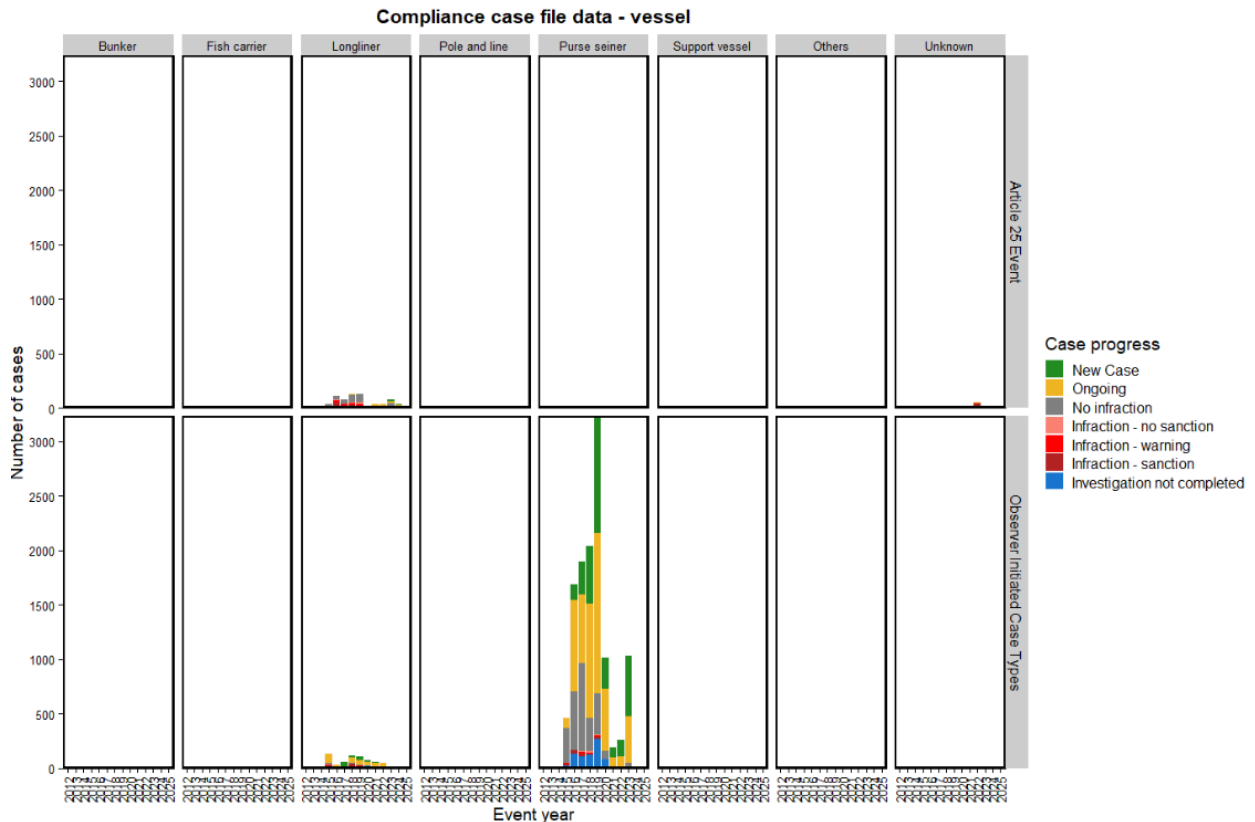
**Figure 3:** The distribution of longline fishing effort and observer effort for 2021-2024

**Table 1:** Count of Individual vessels that have generated CCFS cases by event and year and vessel type (Total CCFS cases)

Vessel type	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Bunker	0	0	0	0	0	0	0	1	0	0	1	0	0	0
Fish carrier	0	0	0	0	0	1	3	0	0	1	10	4	4	1
Longliner	1	1	2	49	79	119	151	144	50	69	63	44	22	11
Pole and line	0	0	0	1	1	0	5	0	0	0	0	0	0	1
Purse seiner	0	3	2	136	253	241	241	264	206	47	116	178	4	0
Support vessel	0	0	0	0	0	0	0	0	0	1	13	10	9	0
Others	0	0	0	0	1	5	0	0	0	0	0	0	0	0
Unknown	0	0	0	0	0	1	1	0	1	1	1	1	1	1

20. In **Table 1**, the impact of the observer-initiated cases in the CCFS indicates a potential bias in the CCFS cases towards purse seine vessels. In **Figure 4** (below), it is apparent that most observer-initiated cases relate to purse seine vessels (where the tropical tuna CMM requires a 100% observer coverage rate). Whereas for CCM-initiated cases (Article 25(2) cases), **Figure 4** shows a greater proportion of cases relate to longline vessels.

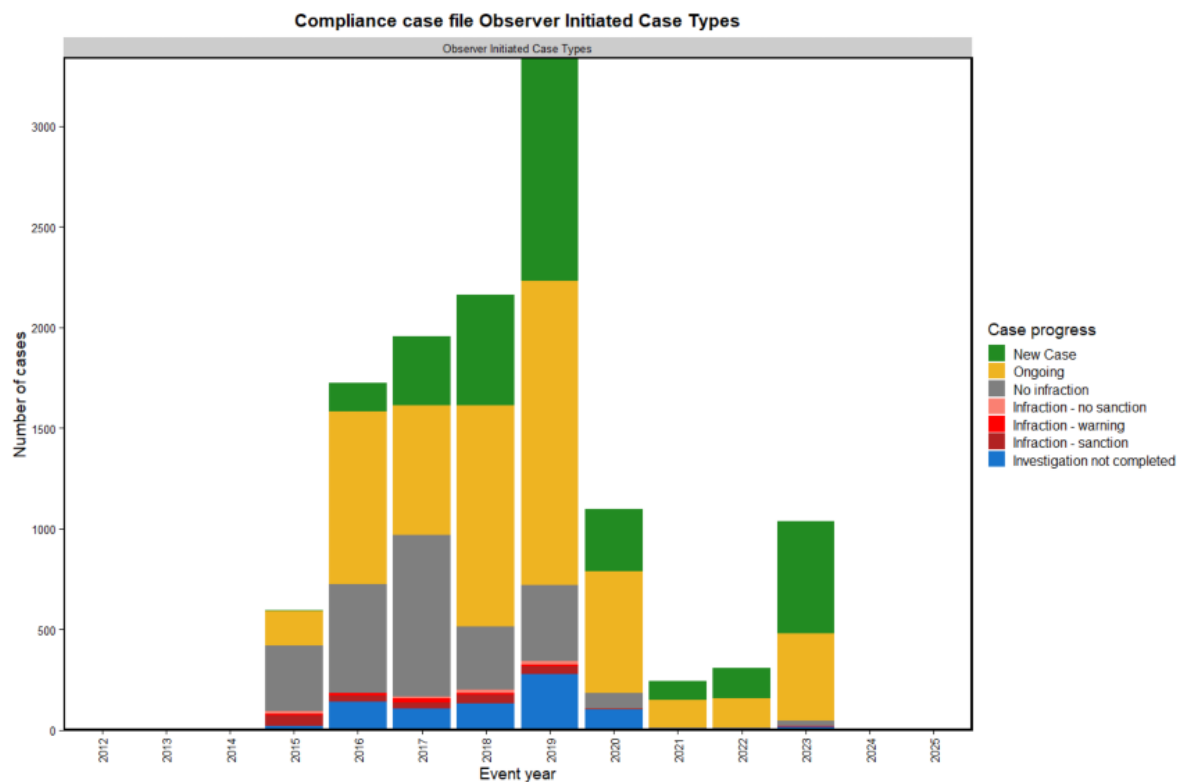




**Figure 4:** The number of cases by vessel type that are CCM initiated (Article 25(2)) and Observer-initiated, excluding PAI cases by vessel type (Total CCFS Cases). Note NULL refers to cases with two vessels of differing types involved in the same case.

21. **Figure 5** and **Table 2**, below, illustrate the scale of observer-initiated cases in the CCFS which peaked during 2016 – 2019, but has since declined in recent years. Reduced observer placements during the COVID-19 pandemic could be a contributing factor for reduced case numbers for 2021/22. The result of the subsampling approach is shown in **Figure 6** and **Table 3**.
22. **Table 2** and **Table 4** below illustrate the scale of recorded PAI, CWS, and FAI cases compared to OAI, SHK, and POL cases. Table 2 also shows that four of the six types of observer-initiated cases showed a trend of initially higher case numbers, which then declined over time. **Figure 7** presents information on the progress of CCFS case investigations by topic, which shows larger proportions of *No Infraction* outcomes. The result of the subsampling approach is shown in **Figure 8**.
23. **Table 4** and **Table 5** confirm the trends in total observer-initiated cases that many investigations of cases remain underway, particularly for CWS and PAI cases.
24. Snapshot summaries of trends and data related to FAI, OAI, SHK, and POL observer-initiated case types, including how they link to CMM obligations, are provided on pages 12 – 19. Snapshot summaries and discussion about CWS interactions and PAI notifications are on pages 20 – 26.

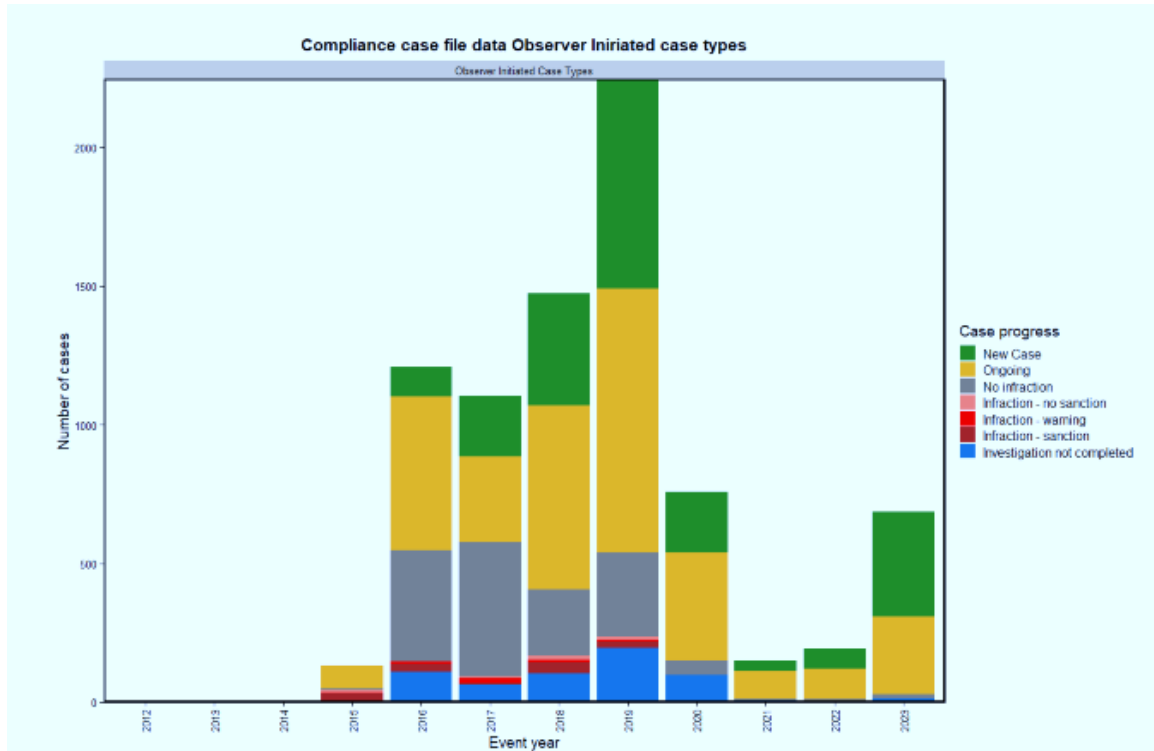




**Figure 5:** Summary of the total set of observer-initiated cases between 2013 and 2024 showing the case progress and, if completed, the outcome of the investigation

**Table 2:** The breakdown in the total set of observer-initiated case number by year, with sub-total before including PAI and CWS cases

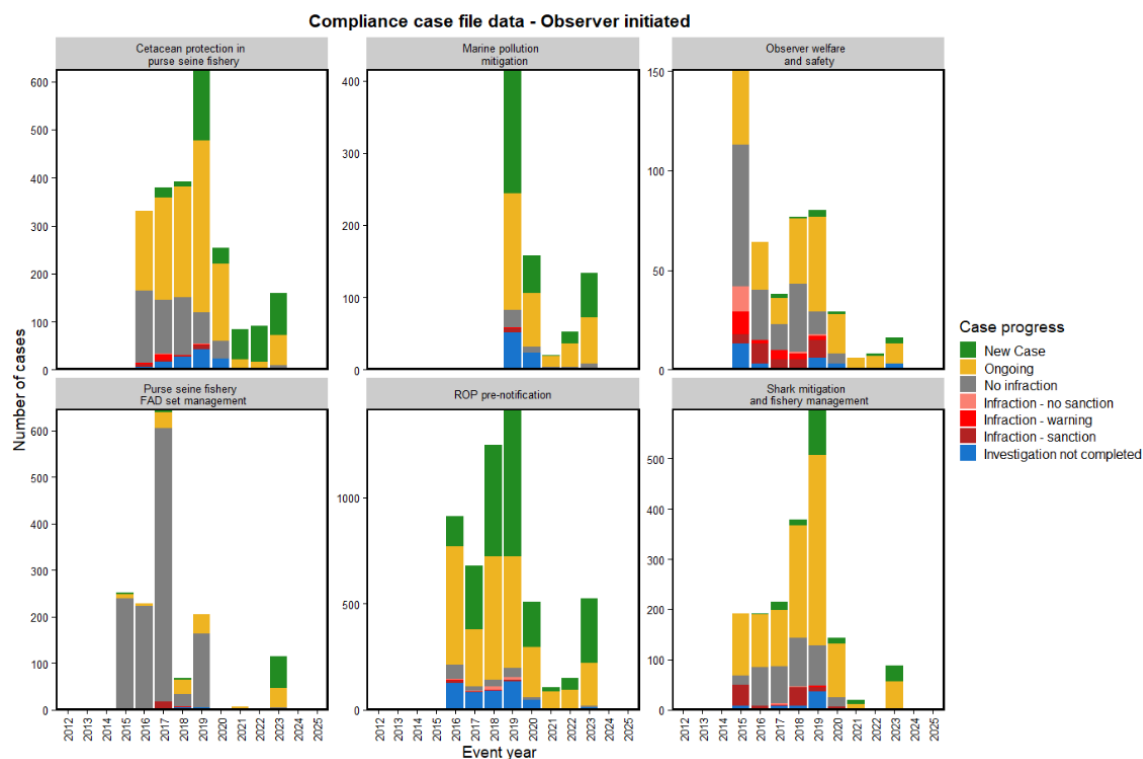
	Case type	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Observer Initiated Case	FAI	0	0	252	229	646	68	205	4	7	3	115	0	0
	OAI	0	0	151	64	38	77	80	29	6	8	16	0	0
	SHK	0	0	191	44	34	72	34	11	0	1	8	0	0
	POL	0	0	0	0	0	0	416	158	20	53	134	0	0
	Sub-total	0	0	594	337	718	217	735	202	33	65	273	0	0
	CWS	0	0	0	478	561	699	1,190	387	105	94	239	0	0
	PAI	0	0	0	911	677	1,248	1,415	507	107	150	525	0	0
	Sub-total	0	0	0	1,389	1,238	1,947	2,605	894	212	244	764	0	0



**Figure 6:** Summary of the observer-initiated cases, after the subsampling approach was applied, between 2013 and 2024 showing the case progress and, if completed, the outcome of the investigation

**Table 3:** The breakdown in observer-initiated case number by year, with sub-total before including PAI and CWS cases, after the subsampling approach was applied.

	Case type	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Observer Initiated Case	FAI	0	159	381	48	165	3	7	3	55	0	0
	OAI	18	49	23	54	65	23	4	8	13	0	0
	SHK	114	37	18	59	20	7	0	1	5	0	0
	POL	0	0	0	0	299	118	16	44	98	0	0
	CWS	0	334	299	460	773	244	48	37	149	0	0
	Total	132	579	721	621	1,322	395	75	93	93	0	0



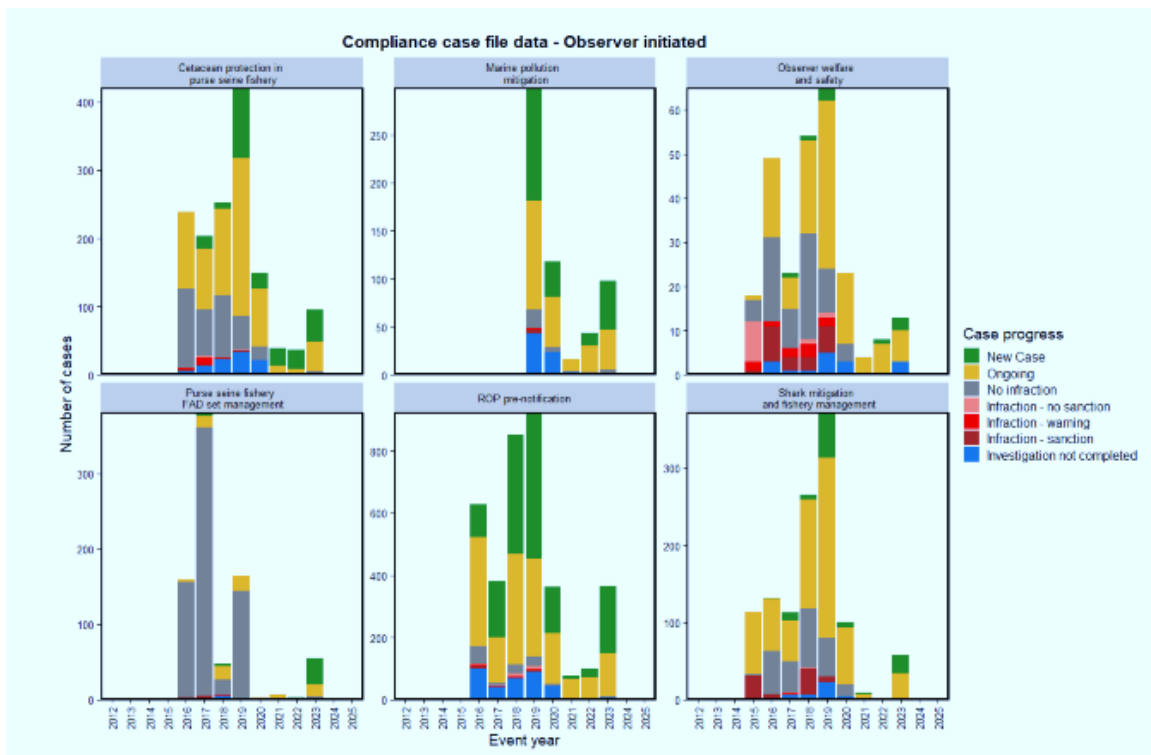
**Figure 7:** The total number of observer-initiated cases in the compliance case file system by CMM theme type

**Table 4:** The breakdown in case numbers by year, for the total observer-initiated cases and the case progress, for FAI, SHK, OAI, POL cases

Case progress	2015	2016	2017	2018	2019	2020	2021	2022	2023
New Case	3	0	9	4	174	52	1	19	132
Ongoing	132	40	48	48	222	82	22	34	112
No infraction	254	229	603	43	191	14	1	2	11
Infraction - no sanction	0	0	0	0	1	0	0	2	0
Infraction - warning	1	0	1	1	2	0	0	0	0
Infraction - sanction	44	4	16	36	5	1	0	0	0
Investigation not completed	9	0	3	8	60	24	3	0	2

**Table 5:** The breakdown in case numbers by year, for total CWS interactions and PAI cases

Case progress	2016	2017	2018	2019	2020	2021	2022	2023
New Case	144	333	547	931	256	94	132	421
Ongoing	794	581	1,018	1,241	501	109	102	313
No infraction	284	188	234	178	60	4	6	16
Infraction - no sanction	2	9	17	13	0	0	0	0
Infraction - warning	9	16	5	7	0	0	0	1
Infraction - sanction	19	6	4	24	1	0	0	1
Investigation not completed	137	105	122	211	76	5	4	12



**Figure 8:** The number of observer-initiated cases in the compliance case file system, after the subsampling approach was applied, by CMM theme type

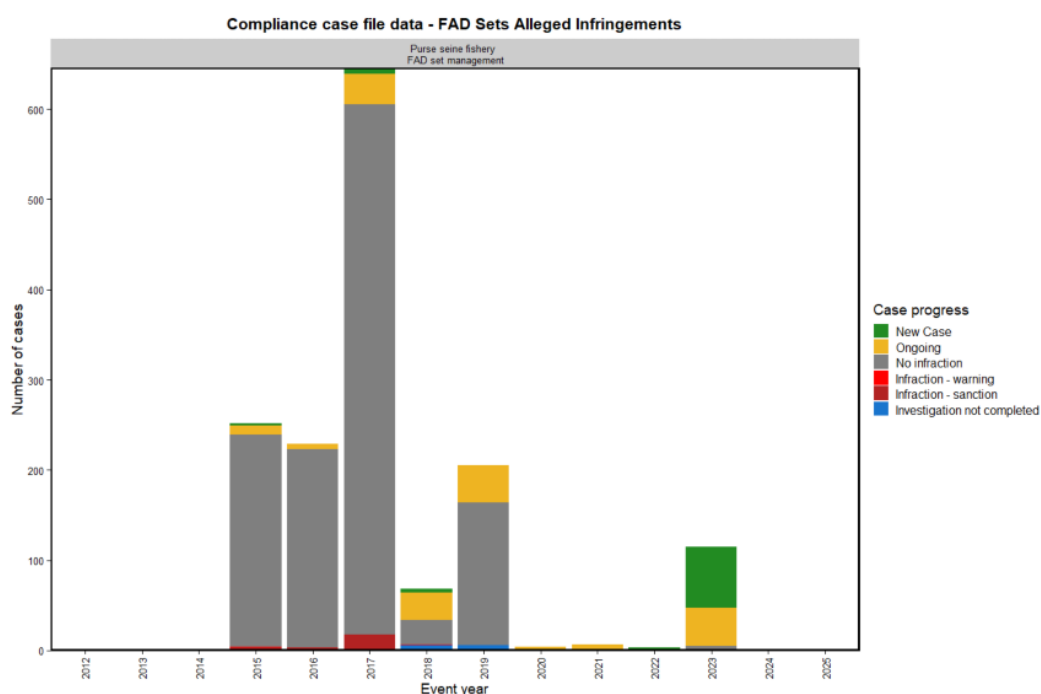
## FAI: FAD Set Alleged Infringement case snapshot summary

Data presented in these analyses is based on available ROP data as of November 2024 and CCM replies to CCFS cases that had been reviewed by the Secretariat as at the 26th August 2025.

Cases for alleged infringements related to setting on FADs during the FAD closure period, and as were identified in ROP observer data.

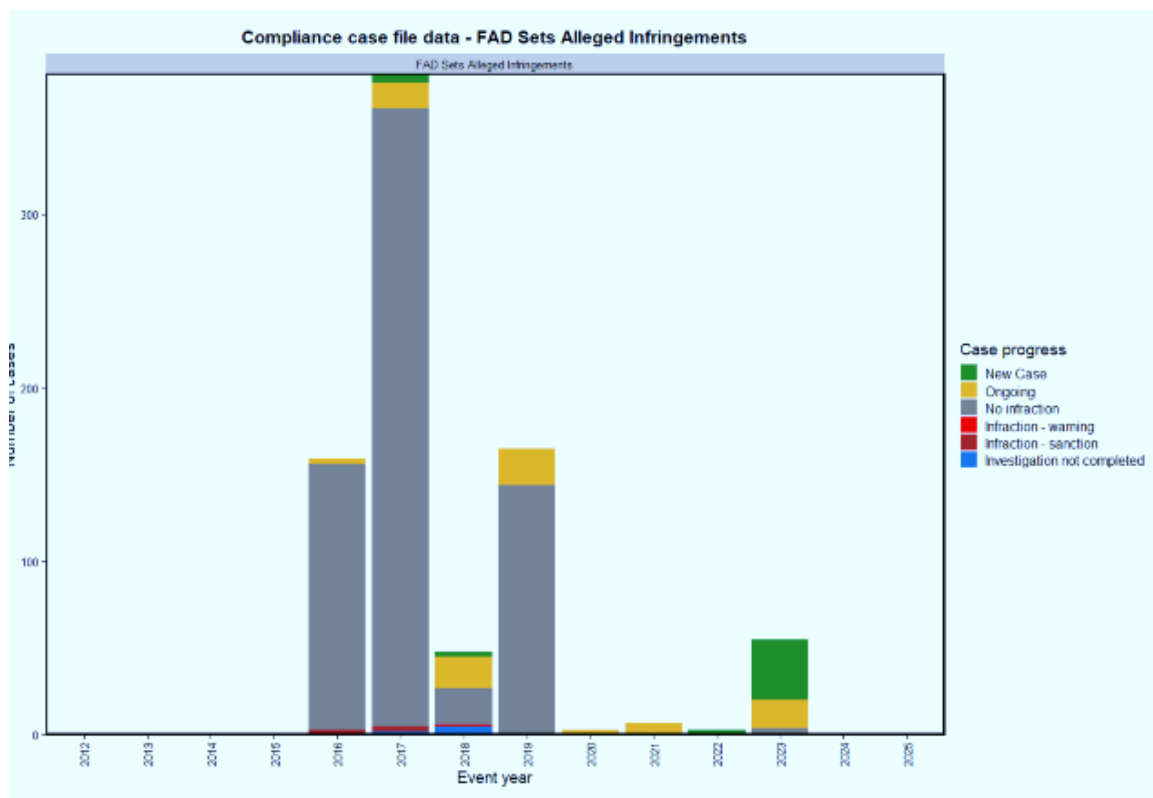
Cases are generated where a ROP observer has reported instances during a WCPFC ROP trip where a purse seine vessel was observed to have made an associated set in a location and during a period, when the said vessel was not expected through the provisions of the TT CMM to be permitted to set on FADs.

**Obligation:** [CMM 2023-01](#) 13, 14  
(formerly CMM 2021-01 14, 15)



**FAI Snapshot Summary:** The total number of observer-initiated FAD set alleged infringement cases (FAI) and the number of ROP observer reports received (value in parenthesis)

FAI - All											
Status	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
New Case	3 (0)	0	7 (4)	4 (1)	0	0	0	2 (0)	68 (3)	0	0
Investigation in Progress	10 (0)	6 (2)	34 (7)	30 (7)	41 (8)	4 (2)	7 (5)	1 (0)	42 (0)	0	0
No infraction	235 (24)	220 (57)	587 (85)	27 (13)	158 (8)	0	0	0	5 (2)	0	0
Infraction - no sanction	0	0	0	0	0	0	0	0	0	0	0
Infraction - warning	1 (1)	0	0	1 (1)	0	0	0	0	0	0	0
Infraction - sanction	2 (2)	3 (3)	16 (16)	0	0	0	0	0	0	0	0
Investigation not completed	1 (0)	0	2 (0)	6 (3)	6 (6)	0	0	0	0	0	0



**FAI Snapshot Summary- subsampled:** The number of observer-initiated FAD set alleged infringement cases (FAI) and the number of ROP observer reports received (value in parenthesis), after the subsampling approach was applied.

FAI								
Status	2016	2017	2018	2019	2020	2021	2022	2023
New Case		5 (4)	3 (0)				2 (0)	35 (3)
Investigation in Progress	3 (2)	15 (5)	18 (6)	21 (7)	3 (2)	7 (5)	1 (0)	16 (0)
No infraction	153 (32)	356 (37)	21 (7)	144 (7)				4 (2)
Infraction - warning			1 (1)					
Infraction - sanction	3 (3)	3 (3)						
Investigation not completed		2 (0)	5 (3)					

## OAI: Observer Obstruction Alleged Infringements snapshot summary

Data presented in these analyses is based on available ROP data as of November 2024 and CCM replies to CCFS cases that had been reviewed by the Secretariat as at the 26th August 2025.

### Observer Trip Monitoring Codes

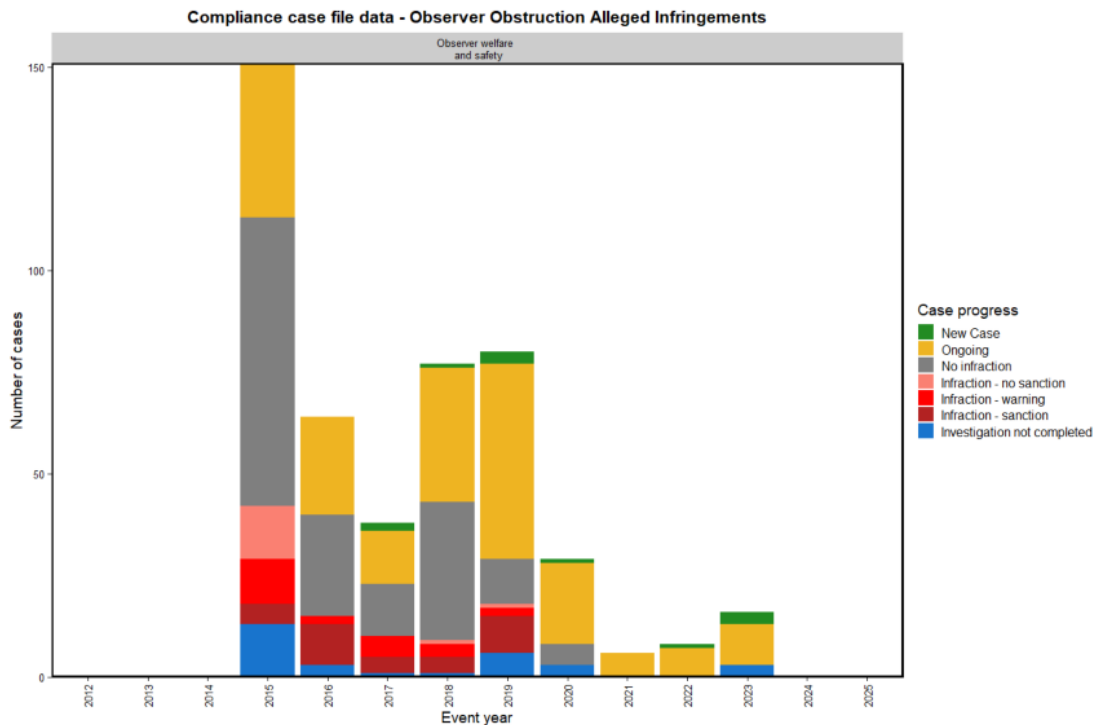
**RS-A** Did the operator or any crew member assault, obstruct, resist, delay, refuse boarding to, intimidate, or interfere with observer in the performance of their duties.

**RS-B** Request that an event not be reported by the observer.

**RS-D** Did the operator fail to provide the observer, while on board the vessel, at no expense to the observer or the observer's government, with food, accommodation and medical facilities of a reasonable standard equivalent to those normally available and medical facilities of a reasonable standard equivalent to those normally available to an officer on board the vessel.

**Obligation:** [CMM 2018-05](#) 15(g))

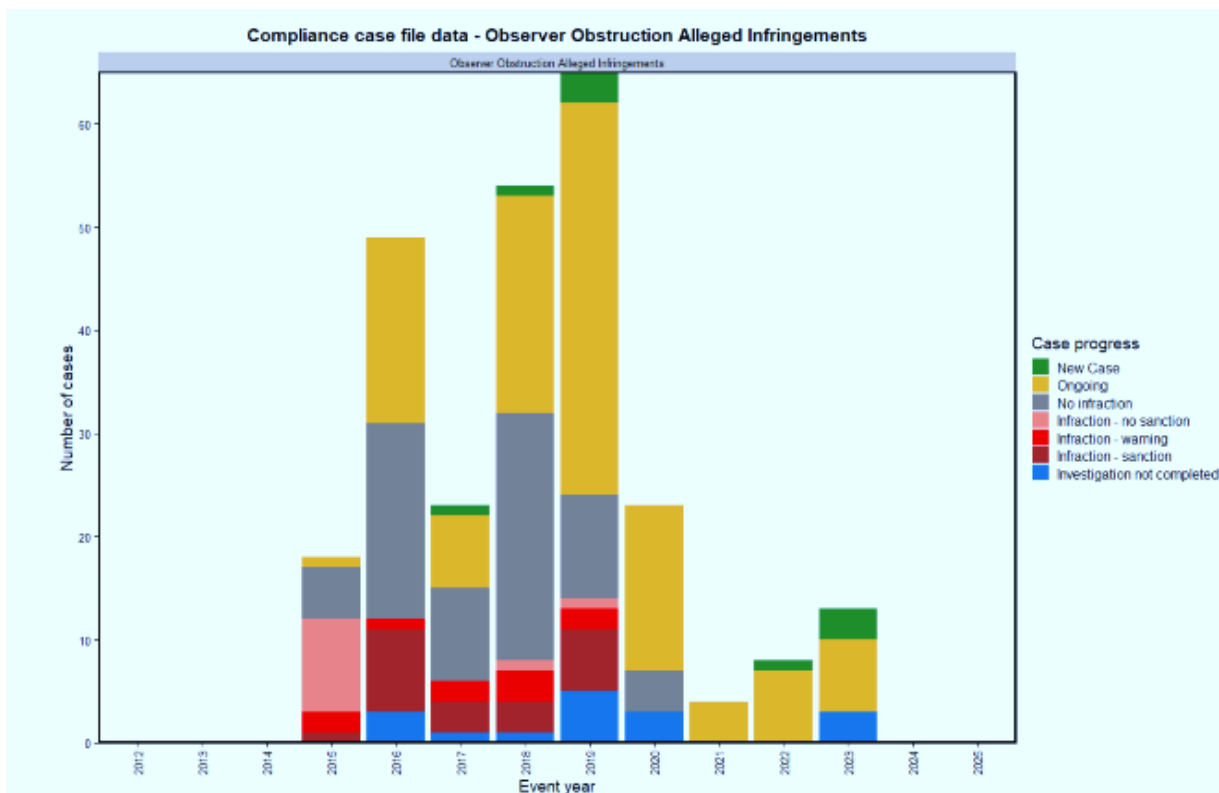
(formerly CMM 2007-01 14(vii))



**OAI Snapshot Summary:** The number of observer-initiated observer obstruction cases (OAI) and the number of ROP observer reports received (value in parenthesis)

OAI - All											
Status	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
New Case	0	0	2 (1)	1 (1)	3 (2)	1 (1)	0	1 (0)	3 (0)	0	0
Investigation in Progress	38 (3)	24 (0)	13 (2)	33 (9)	48 (13)	20 (9)	6 (0)	7 (1)	10 (0)	0	0
No infraction	71 (70)	25 (22)	13 (12)	34 (34)	11 (11)	5 (5)	0	0	0	0	0
Infraction - no sanction	13 (13)	0	0	1 (1)	1 (1)	0	0	0	0	0	0
Infraction - warning	11 (11)	2 (2)	5 (4)	3 (3)	2 (1)	0	0	0	0	0	0
Infraction - sanction	5 (5)	10 (10)	4 (4)	4 (4)	9 (8)	0	0	0	0	0	0
Investigation not completed	13 (0)	3 (1)	1 (1)	1 (0)	6 (0)	3 (1)	0	0	3 (1)	0	0





**OAI Snapshot Summary - subsampled:** The number of observer-initiated observer obstruction cases (OAI) and the number of ROP observer reports received (value in parenthesis), after the subsampling approach was applied.

OAI									
Status	2015	2016	2017	2018	2019	2020	2021	2022	2023
New Case			1 (1)	1 (1)	3 (2)			1 (0)	3 (0)
Investigation in Progress	1 (0)	18 (0)	7 (2)	21 (8)	38 (12)	16 (7)	4 (0)	7 (1)	7 (0)
No infraction	5 (5)	19 (17)	9 (9)	24 (24)	10 (10)	4 (4)			
Infraction - no sanction	9 (9)			1 (1)	1 (1)				
Infraction - warning	2 (2)	1 (1)	2 (2)	3 (3)	2 (1)				
Infraction - sanction	1 (1)	8 (8)	3 (3)	3 (3)	6 (5)				
Investigation not completed		3 (1)	1 (1)	1 (0)	5 (0)	3 (1)			3 (1)

## SHK: Shark Catch Alleged Infringements snapshot summary

Data presented in these analyses is based on available ROP data as of November 2024 and CCM replies to CCFS cases that had been reviewed by the Secretariat as at the 26th August 2025.

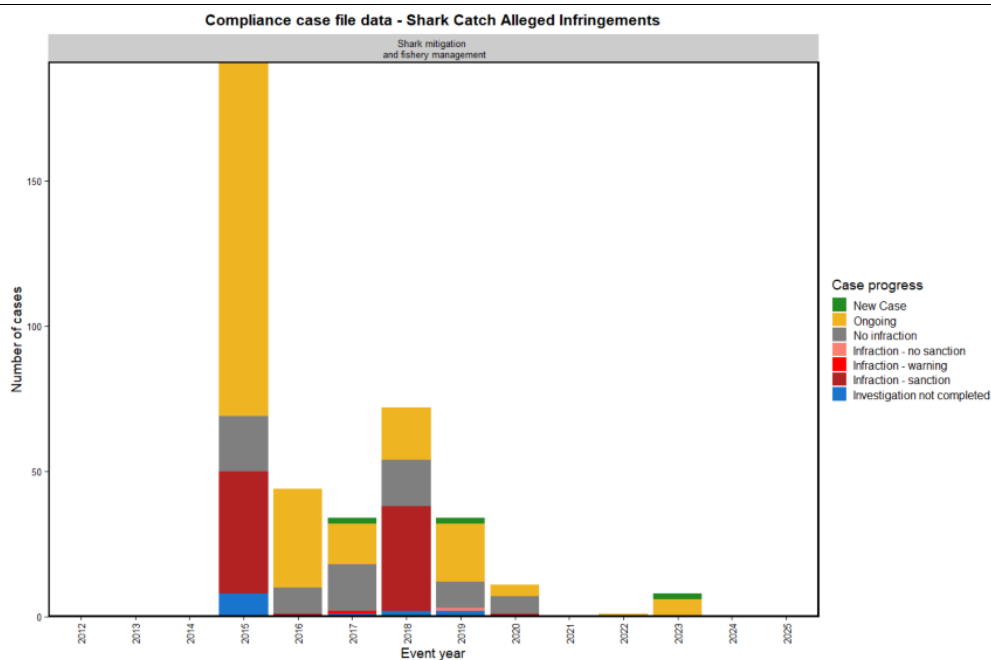
Cases for alleged infringements related to retention of oceanic white tip or silky sharks, or shark finning activity identified in ROP observer data.

Cases are generated where a ROP observer has reported instances during a WCPFC ROP trip where:

- fishing vessel has caught an oceanic white tip or silky shark as identified by a specific species code (SP\_code) in combination with an observed fate code (FATE\_code) indicating retention is whole or in part.
- fishing vessel has caught shark as identified by a species code (SP\_code) in combination with an observed fate code (FATE\_code) indicating finning activity.

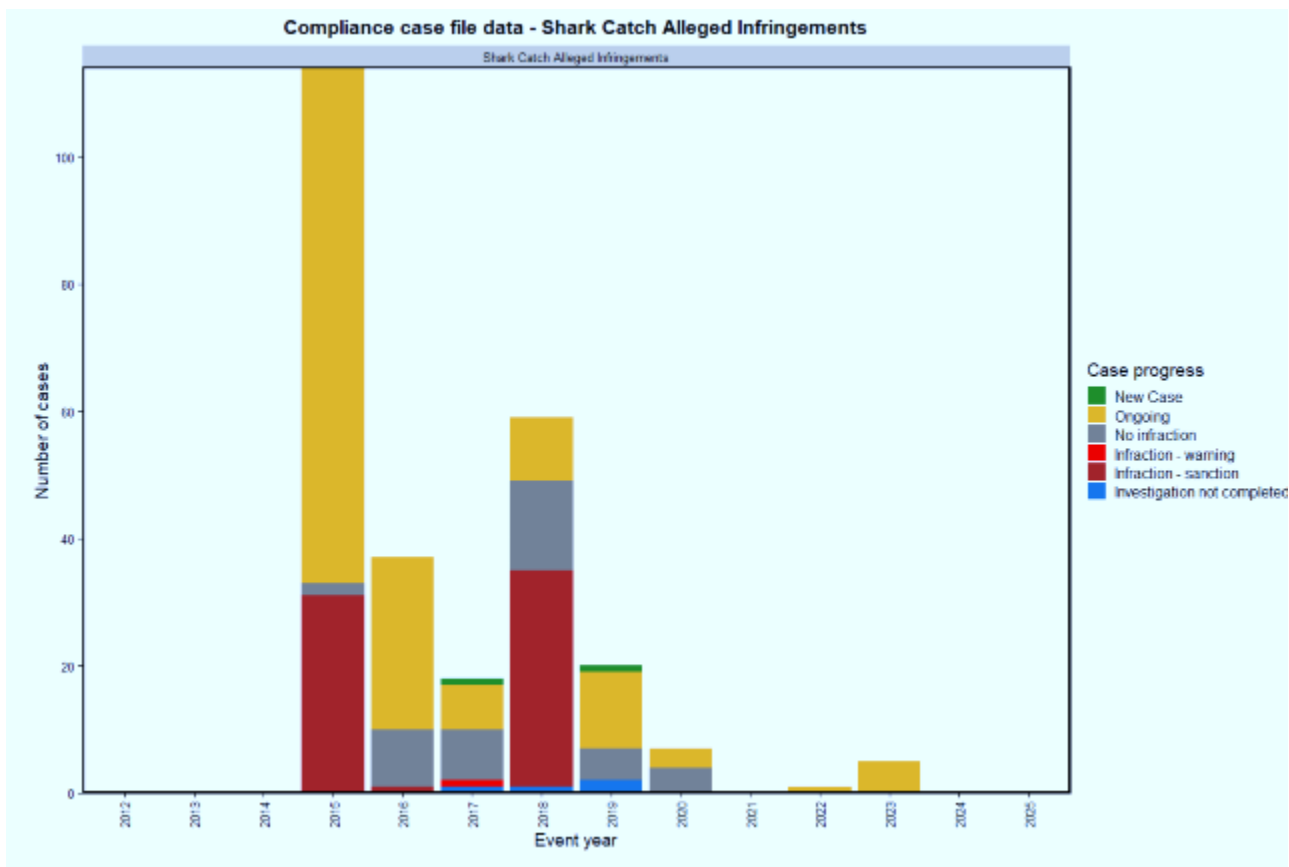
**Obligation:** [CMM 2022-04](#)

(formerly CMM 2010-07: Sharks, CMM 2011-04 Oceanic Whitetip Sharks, CMM 2013-08: Silky Sharks, and CMM 2019-04)



**SHK Snapshot Summary:** The number of observer-initiated shark-catch cases (SHK) and the number of ROP observer reports received (value in parenthesis)

SHK - All											
Status	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
New Case	0	0	2 (2)	0	2 (0)	0	0	0	2 (0)	0	0
Investigation in Progress	122 (0)	34 (12)	14 (5)	18 (10)	20 (4)	4 (1)	0	1 (0)	6 (0)	0	0
No infraction	19 (19)	9 (9)	16 (16)	16 (16)	9 (9)	6 (6)	0	0	0	0	0
Infraction - no sanction	0	0	0	0	1 (1)	0	0	0	0	0	0
Infraction - warning	0	0	1 (1)	0	0	0	0	0	0	0	0
Infraction - sanction	42 (42)	1 (1)	0	36 (36)	0	1 (1)	0	0	0	0	0
Investigation not completed	8 (3)	0	1 (0)	2 (0)	2 (0)	0	0	0	0	0	0



**SHK Snapshot Summary – subsampled:** The number of observer-initiated shark-catch cases (SHK) and the number of ROP observer reports received (value in parenthesis), after the subsampling approach was applied.

SHK								
Status	2015	2016	2017	2018	2019	2020	2022	2023
New Case			1 (1)		1 (0)			
Investigation in Progress	81 (0)	27 (8)	7 (2)	10 (3)	12 (4)	3 (1)	1 (0)	5 (0)
No infraction	2 (2)	9 (9)	8 (8)	14 (14)	5 (5)	4 (4)		
Infraction - warning			1 (1)					
Infraction - sanction	31 (31)	1 (1)		34 (34)				
Investigation not completed			1 (0)	1 (0)	2 (0)			

## POL: Marine Pollution Infringements snapshot summary

Data presented in these analyses is based on available ROP data as of November 2024 and CCM replies to CCFS cases that had been reviewed by the Secretariat as at the 26th August 2025.

### Observer Trip Monitoring Codes

**PN-A** Dispose of any metals, plastics, chemicals, or old fishing gear

**PN-B** Discharge any oil

**PN-C** Lose any fishing gear

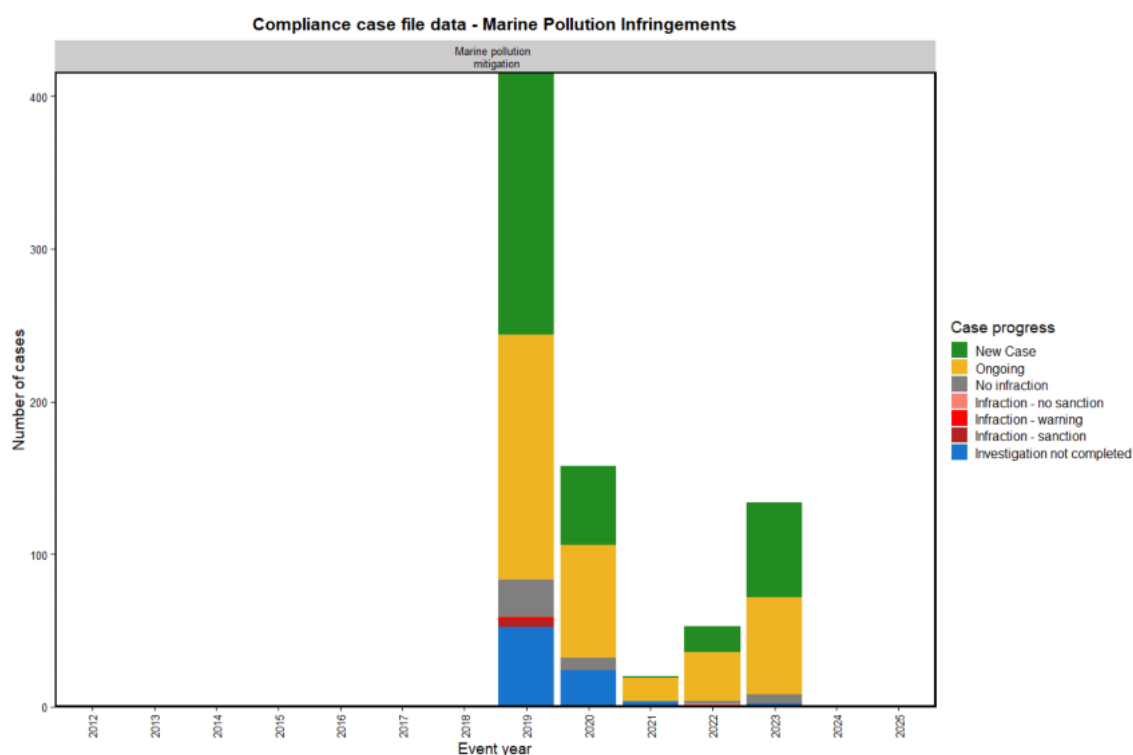
**PN-D** Abandon any fishing gear

**PN-E** Fail to report any abandoned gear

**Obligation:** [CMM 2017-04](#) 02, 03-07\*

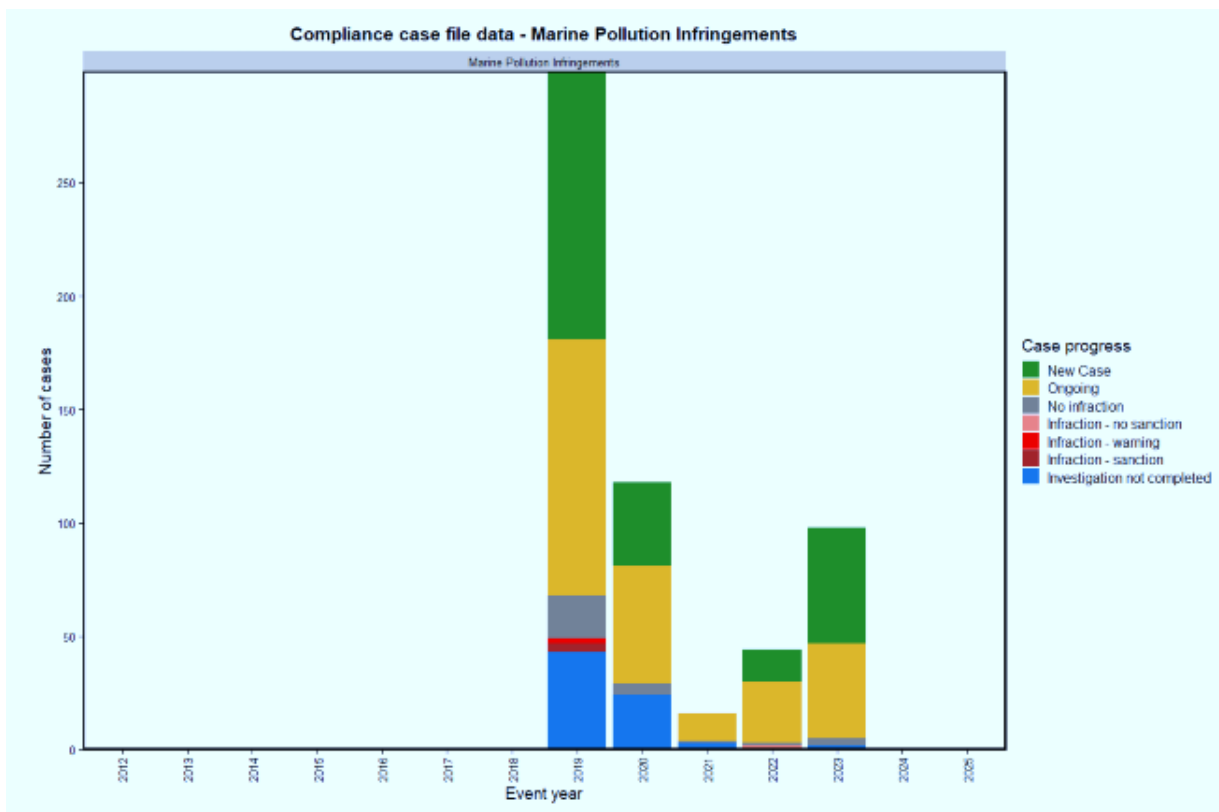
\* Note in paras 03 -07, the obligation is CCMs are encouraged or shall encourage...

Cases commence in 2019, because CMM 2017-04 had an effective date of 1 January 2019



**POL Snapshot Summary:** The number of observer-initiated pollution-related cases (POL) and the number of ROP observer reports received (value in parenthesis)

POL - All											
Status	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
New Case	0	0	0	0	172 (35)	52 (2)	1 (0)	17 (3)	62 (1)	0	0
Investigation in Progress	0	0	0	0	161 (22)	74 (8)	15 (2)	32 (2)	64 (5)	0	0
No infraction	0	0	0	0	24 (24)	8 (8)	1 (0)	2 (1)	6 (4)	0	0
Infraction - no sanction	0	0	0	0	0	0	0	2 (2)	0	0	0
Infraction - warning	0	0	0	0	2 (2)	0	0	0	0	0	0
Infraction - sanction	0	0	0	0	5 (4)	0	0	0	0	0	0
Investigation not completed	0	0	0	0	52 (13)	24 (8)	3 (0)	0	2 (0)	0	0



**POL Snapshot Summary - subsampled:** The number of observer-initiated pollution-related cases (POL) and the number of ROP observer reports received (value in parenthesis), after the subsampling approach was applied.

POL					
Status	2019	2020	2021	2022	2023
New Case	118 (28)	37 (1)		14 (3)	51 (1)
Investigation in Progress	113 (15)	52 (7)	12 (2)	27 (1)	42 (3)
No infraction	19 (19)	5 (5)	1 (0)	1 (0)	3 (2)
Infraction - no sanction				2 (2)	
Infraction - warning	2 (2)				
Infraction - sanction	4 (3)				
Investigation not completed	43 (11)	24 (8)	3 (0)		2 (0)

## Issues with cetacean and whale shark (CWS) interactions and some pre-notification cases (PAI cases)

25. In recent years, TCC has recognized that PAI and CWS cases should be differentiated from other observer-initiated cases in CCFS. For this reason, **Table 2** and **Table 5** (on pages 8 and 11 above) presents the PAI and CWS case counts separately from the presentation of other CCFS case data.

### *CWS interactions*

26. At TCC18, the Secretariat prepared a paper that outlined the ROP data issues affecting the CWS cases<sup>3</sup>. The issue is that currently the ROP data fields do not permit the observer to categorise the data fields that are inputs to the CCFS to distinguish between interactions where there is no alleged infringement and that are of scientific interest, with those interactions or actions by the crew that could indicate a potential infringement has occurred.
27. The CCFS CWS instances currently reflect a recording by the observer of interactions between the vessel and marine mammals or with whale sharks (an observer on a purse seine vessel has reported a cetacean or whale sharks, as identified by a specific species code (SP\_code) in combination with an observed fate code (FATE\_code)). The rationale for the collection of the relevant ROP data fields was to provide information for the Commission and CCMs to support both science and compliance monitoring purposes, but the current reporting does not achieve this effectively.
28. The data in the CWS Interactions snapshot summary on pages 24-26 illustrates the scale of the issue and highlights that the data and experience show the current ROP data definitions are creating unintended consequences in the CCFS.
29. The Commission has acknowledged the CWS cases are an issue and TCC17 (2021) agreed this data would be excluded from consideration of the current trial process of reviewing the Aggregated Tables.<sup>4</sup> The broader context in the summary information shown below is the reason for this matter being prioritised in the [ROP-IWG](#) workplan.

### *PAI cases*

30. The ROP Data based on Observer Trip Monitoring Summary Data is essentially a tick (an answer in the affirmative) by the observer against the relevant Trip Monitoring Summary Codes (commonly this is collected on the FFA/SPC GEN-3 form). Within the CCFS, there are three types of cases that are based on Observer Trip Monitoring Summary Data:
- **OAI:** Observer Obstruction Alleged Infringements
  - **POL:** Marine Pollution Alleged Infringements
  - **PAI:** The remaining ROP Pre-notification data elements (other than alleged observer obstruction incidents (OAI) and marine pollution incidents (POL)) that were answered in the affirmative by a ROP observer on the WCPFC Observer Trip Monitoring Summary.

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<sup>3</sup> See [TCC18-2022-17](#) Supporting paper for TCC18 consideration of potential improvements to the ROP Minimum Standard Data Fields for impacts of fishing on whale sharks and cetaceans.

<sup>4</sup> Final CMR, paragraph 10 (December 2021).

31. The reason that the OAI, POL and PAI cases are notified through the CCFS stems from a previous Commission decision from WCPFC12 (December 2015).<sup>5</sup> This decision tasks the SPC-OFP and the Secretariat to prioritise data entry for the observer trip monitoring data and to facilitate the notification of any affirmative answers on the Observer Trip Monitoring Summary to the responsible flag CCM with a view to providing them earlier notification of potential alleged infringements by their vessels. For ease of reference, the 2015 adopted pre-notification process is provided in Annex 1.
32. In the summary snapshots of the data for OAI and POL cases provided on Pages 16-17 and 18-19 above, progress of investigations by flag CCMs is evident, and there is a clear link to specific obligations in CMMs: for OAI it is the ROP [CMM 2018-05](#) 15(g)) and for POL it is the marine pollution [CMM 2017-04](#) 02 or 03-07. With respect to PAI cases relating to the remaining Observer Trip Monitoring Summary Data Fields, these codes presently don't have a clear link to an obligation in a WCPFC CMM or a specific requirement in the Convention.
33. The Commission has acknowledged the PAI cases are an issue and at WCPFC14 accepted the TCC13 recommendation that TCC not consider the information contained in the ROP Pre-notification List for the purpose of assessing any obligations for which it was relevant, except for those cases related to observer interference or obstruction in future years<sup>6</sup>. Following the entry into force on 1 January 2019 of CMM 2017-04, the relevant Observer Trip Monitoring Codes (PN-A to PN-E) are notified as POL cases.
34. The scale of the PAI cases in the CCFS illustrated in the snapshot summary on pages 25-26 quantifies the issue. Resolving the issue of PAI cases is a main priority of the [ROP-IWG](#), and in 2024 and 2025, some suggestions have been made as part of ROP-IWG discussions of ways to utilise debriefing information to support reviews of PAI cases.

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<sup>5</sup> "Commission Adopted pre-notification process from observer providers to flag CCMs of possible alleged infringements by their vessels and to coastal State CCMs of possible alleged infringements in their waters" (WCPFC12 Summary Report paragraph 569, Attachment U).

<sup>6</sup> WCPFC14 final CMR, December 2017



## CWS: Cetacean and Whale Shark Interactions snapshot summary

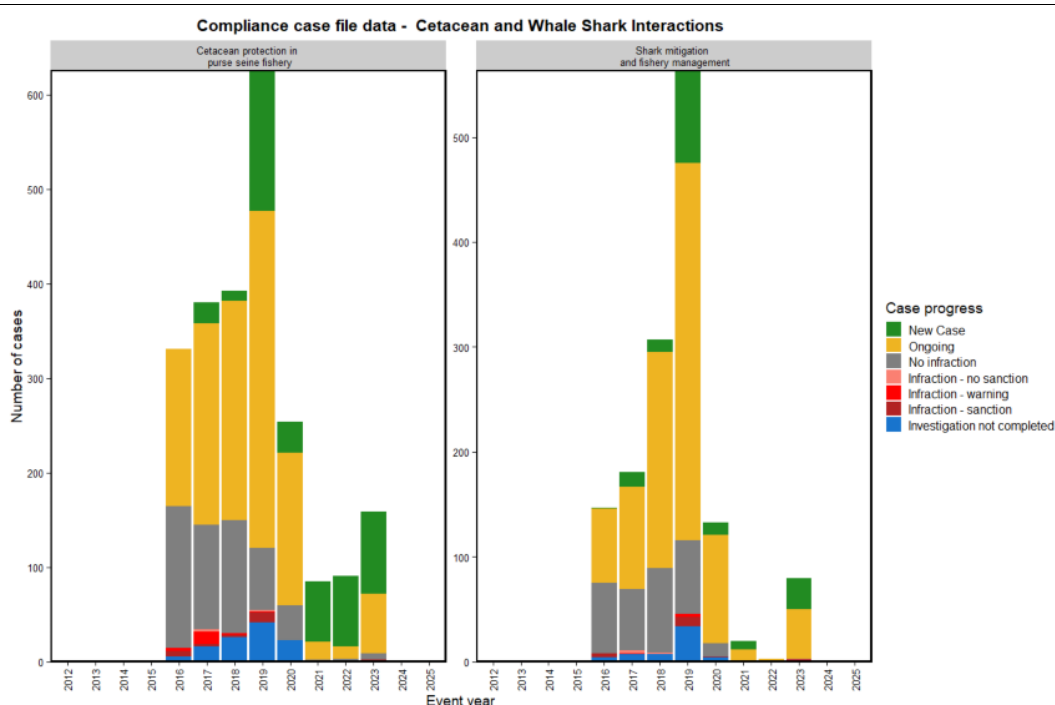
Data presented in these analyses is based on available ROP data as of November 2024 and CCM replies to CCFS cases that had been reviewed by the Secretariat as at the 26th August 2025.

Relevant WCPFC requirements prohibit purse seine vessels from setting if a whale shark or cetacean is sighted prior to the commencement of the set; required reporting of any incidents of unintentional encircling; and guidelines for safe release.

Cases are generated where a ROP observer has reported instances during a WCPFC ROP trip where a cetacean or whale sharks as identified by a specific species code (SP\_code) in combination with an observed fate code (FATE\_code) indicates an interaction with the fishing vessel's activity.

**Obligations:** [CMM 2011-03](#)

[CMM 2022-04](#) (formerly CMM 2012-04 and CMM 2019-04)

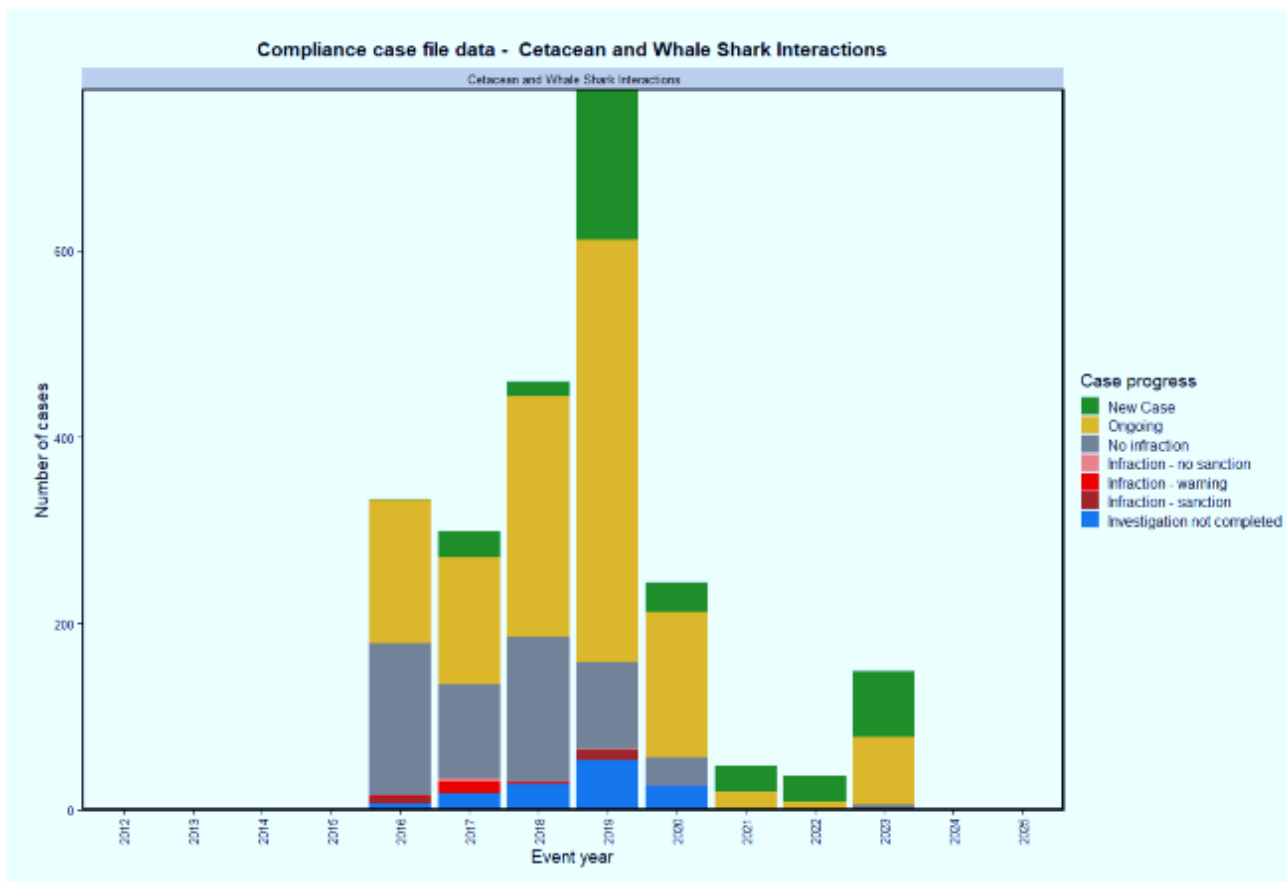


**CWS Snapshot Summary:** The number of observer-initiated cetacean and whale shark interactions cases in the purse seine fishery and case progress.

All CCMs - CWS													
Case Progress	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Total
New Case	0	0	0	1	36	22	238	45	72	75	117	0	606
Investigation in Progress	0	0	0	237	311	438	716	264	31	16	110	0	2,123
No infraction	0	0	0	217	169	200	135	50	2	2	8	0	783
Infraction - no sanction	0	0	0	0	5	2	2	0	0	0	0	0	9
Infraction - warning	0	0	0	4	14	1	4	0	0	0	1	0	24
Infraction - sanction	0	0	0	9	3	3	19	1	0	0	1	0	36
Investigation not completed	0	0	0	10	23	33	76	27	0	1	2	0	172
Total	0	0	0	478	561	699	1,190	387	105	94	239	0	3,753

**Table 6:** The breakdown in total CCFS case numbers, by year, for purse seine vessel interactions with cetaceans and whale sharks. The lower half of the table represents new and ongoing cases that are older than 104 weeks.

Theme	2016	2017	2018	2019	2020	2021	2022	2023	2024	Total
Cetacean protection in purse seine fishery	331	380	392	626	254	85	91	159	0	2,318
Shark mitigation and fishery management	147	181	307	564	133	20	3	80	0	1,435
Total	478	561	699	1,190	387	105	94	239	0	3,753
Ongoing >104 weeks										
Cetacean protection in purse seine fishery	166	235	242	506	193	82	0	0	0	1,424
Shark mitigation and fishery management	72	112	218	448	115	20	0	0	0	985
Total	238	347	460	954	308	102	0	0	0	2,409



**CWS Snapshot Summary - subsampled:** The number of observer-initiated cetacean and whale shark interactions cases in the purse seine (and case progress), after the subsampling approach was applied.

CWS								
Status	2016	2017	2018	2019	2020	2021	2022	2023
New Case	1 (0)	28 (12)	16 (3)	161 (22)	32 (4)	28 (1)	28 (1)	71 (6)
Investigation in Progress	154 (28)	136 (35)	258 (39)	453 (73)	155 (36)	18 (7)	7 (1)	72 (3)
No infraction	163 (154)	101 (99)	155 (148)	94 (92)	31 (31)	2 (1)	1 (1)	4 (3)
Infraction - no sanction		3 (3)	1 (1)	1 (1)				
Infraction - warning	2 (2)	12 (12)	1 (1)					
Infraction - sanction	7 (7)	1 (1)	1 (1)	10 (10)				
Investigation not completed	7 (2)	18 (9)	28 (0)	54 (5)	26 (2)		1 (1)	2 (0)

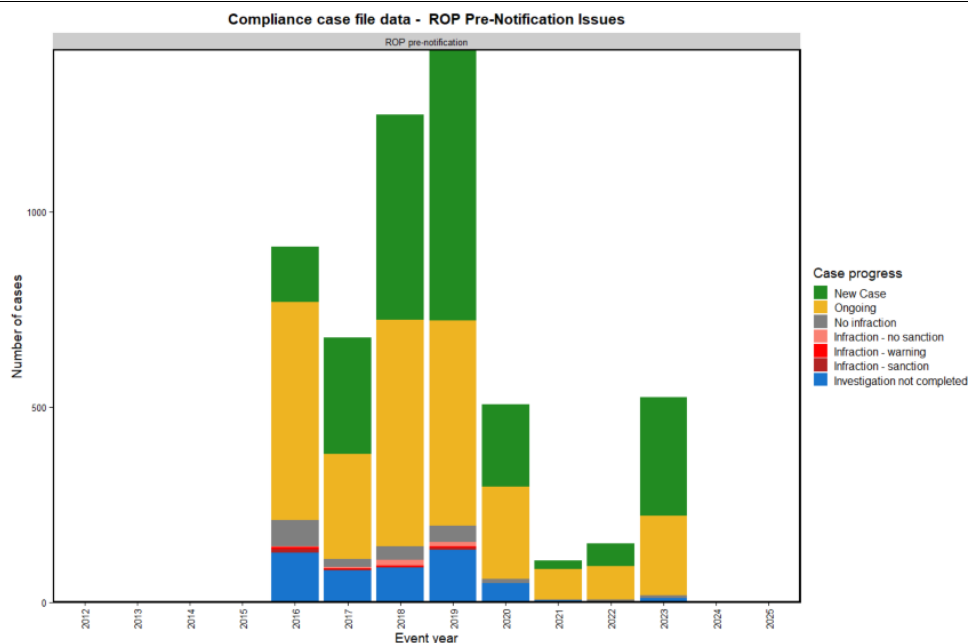
**PAI: ROP Pre-Notification of those data elements (other than alleged observer obstruction incidents and marine pollution incidents) snapshot summary**

*Data presented in these analyses is based on available ROP data as of November 2024 and CCM replies to CCFS cases that had been reviewed by the Secretariat as at the 26th August 2025.*

**Observer Trip Monitoring Codes**

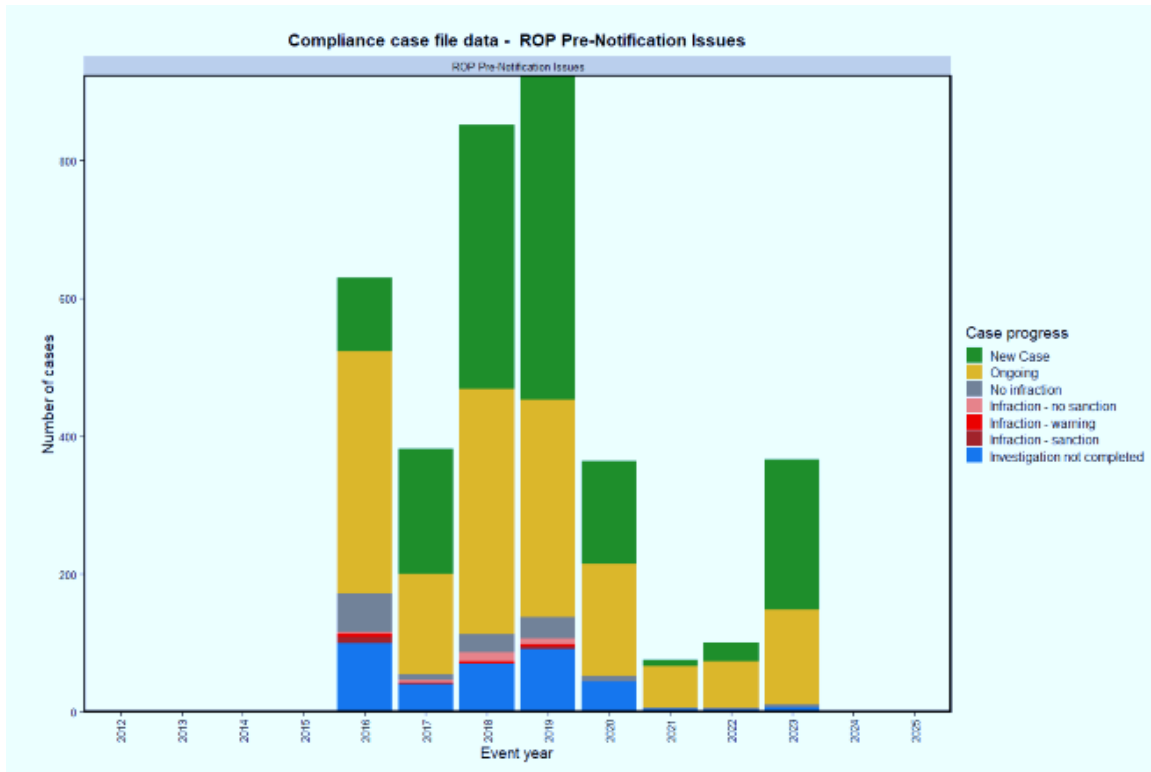
- LC-A** Inaccurately record retained 'Target Species' in the vessel logs
- LC-B** Inaccurately record 'Target Species' discards
- LC-C** Record target species inaccurately (e.g. combine bigeye/yellowfin/skipjack catch)
- LC-E** Inaccurately record retained bycatch species
- LC-F** Inaccurately record discarded bycatch species
- LP-A** Inaccurately record vessel position on vessel logsheets for sets, hauling and catch
- LP-B** Fail to report vessel positions to countries where required when entering and leaving an EEZ
- NR-A** Fish in areas where the vessel is not permitted to fish
- NR-C** Use a fishing method other than the method the vessel was designed or licensed
- NR-E** Transfer or tranship fish from or to another vessel
- NR-G** Fail to stow fishing gear when entering areas where they were not authorized to fish
- SI-B** Interact (not land) with Species of Special Interest
- SS-A** Fail to monitor international safety frequencies
- WC-A** Fail to comply with any Commission CMMs
- WC-B** High-grade the catch

**Obligation: no specific CMM obligation**



Case progress	2016	2017	2018	2019	2020	2021	2022	2023
New Case	143	297	525	693	211	22	57	304
Ongoing	557	270	580	525	237	78	86	203
No infraction	67	19	34	43	10	2	4	8
Infraction - no sanction	2	4	15	11	0	0	0	0
Infraction - warning	5	2	4	3	0	0	0	0
Infraction - sanction	10	3	1	5	0	0	0	0
Investigation not completed	127	82	89	135	49	5	3	10

Theme	2016	2017	2018	2019	2020	2021	2022	2023
ROP pre-notification	911	677	1,248	1,415	507	107	150	525
New cases >104 weeks	143	297	525	693	211	21		



**PAI Snapshot Summary – subsampled:** The number of ROP pre-notification issues (other than alleged OAI and POL incidents) and case progress, after the subsampling approach was applied.

Case progress	2016	2017	2018	2019	2020	2021	2022	2023
New Case	106	182	383	470	150	10	28	218
Ongoing	351	145	356	315	162	60	67	137
No infraction	56	9	26	31	8	1	3	4
Infraction - no sanction	2	3	12	9	0	0	0	0
Infraction - warning	5	2	4	3	0	0	0	0
Infraction - sanction	9	1	0	4	0	0	0	0
Investigation not completed	100	40	70	91	44	5	3	7

Theme	2016	2017	2018	2019	2020	2021	2022	2023
ROP pre-notification	629	382	851	923	364	76	101	366
New cases >104 weeks								
ROP pre-notification	106	182	383	470	150	9	6	0



**COMMISSION  
TWELFTH REGULAR SESSION  
Bali, Indonesia  
3-8 December 2015**

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**COMMISSION ADOPTED PRE-NOTIFICATION PROCESS FROM OBSERVER PROVIDERS TO FLAG CCMS OF POSSIBLE ALLEGED INFRINGEMENTS BY THEIR VESSELS AND TO COASTAL STATE CCMS OF POSSIBLE ALLEGED INFRINGEMENTS IN THEIR WATERS:**

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- a) Observer, as part of their usual duties will complete the ROP minimum data elements on the WCPFC Observer Trip Monitoring Summary, or which are included in SPC/FFA General Form 3 (see example below), for each trip;
- b) Observer keeps this report/form (and all other data) confidential and returns to home port or disembarkation point;
- c) Observer fully disembarks the vessel\*;
- d) Observer transmits their data and reports per their standard procedures to an authorized observer provider/person for their national or subregional observer programme;
- e) Observer arriving back from the vessel in observer's home port, or if required, has to travel back to home country & awaits debriefing;
- f) Observer is debriefed as soon as is practicable after finishing the trip/trips\*;

**Pre-Notification Process**

- g) In the event that there is a "YES" noted in the WCPFC Observer Trip Monitoring Summary, or ROP minimum data elements which are included in SPC/FFA General Form 3 the observer provider is expected where practicable, to promptly submit the relevant data to the Commission Secretariat (the data may be provided through the Commission data service provider (SPC-OFP) or provided directly to the Secretariat).
- h) In considering the timeliness of the submission of the ROP minimum data elements on the WCPFC Observer Trip Monitoring Summary, or which are included in SPC/FFA General Form 3, the observer provider must ensure the observer is safely disembarked from the vessel and has returned to their home port, and where possible the observer has been fully debriefed.
- i) The observer provider may decide that further investigation of a "YES" noted in the WCPFC Observer Trip Monitoring Summary, or ROP minimum data elements which are included in SPC/FFA General Form 3 (or equivalent) is needed before the relevant data is submitted to the Commission Secretariat.

j) If there is only “NO” noted in the WCPFC Observer Trip Monitoring Summary, or ROP minimum data elements which are included in SPC/FFA General Form 3 (or debriefing determines there to be only “NO” noted) the ROP data, including WCPFC Observer Trip Monitoring Summary, or ROP minimum data elements which are included in SPC/FFA General Form 3 would be submitted through usual processes to the Commission Secretariat.

k) The Commission Secretariat will facilitate the provision of certain data fields in the relevant WCPFC Observer Trip Monitoring Summary, or ROP minimum data elements which are included in SPC/FFA General Form 3 and the additional supporting fields \*\*\* to the responsible flag CCM and coastal State CCM where applicable. In accordance with the data rules, the information that is provided to flag CCMs and coastal State CCMs will exclude the name of the observer, their nationality and the observer trip ID, but will instead identify the observer provider programme that placed the observer.

l) The authorised Flag state and coastal State official contacts can request from the observer provider\*\* further supporting details for their investigations. Vessel captain/owners/point of contact will communicate with flag State official contacts regarding any alleged infringements.

m) The Commission Secretariat will facilitate the collation of communications related to the outcome of investigations of any “YES” noted in the WCPFC Observer Trip Monitoring Summary, or ROP minimum data elements which are included in SPC/FFA General Form 3, including from the flag CCMs.

\*If an observers carries out one or more trips consecutively on the same vessel. That vessel cannot request through their official contacts a copy of the WCPFC Observer Trip Monitoring Summary, or ROP minimum data elements which are included in SPC/FFA General Form 3 compiled by that observer until the observer has completely finished his trips on the vessel and has fully disembarked the vessel.

\*\* Request could be sent via the Commission Secretariat or other sub regional organizations who would verify the persons making the request are genuine official contacts and could act as intermediators between the relevant CCM and the provider if they so wish.

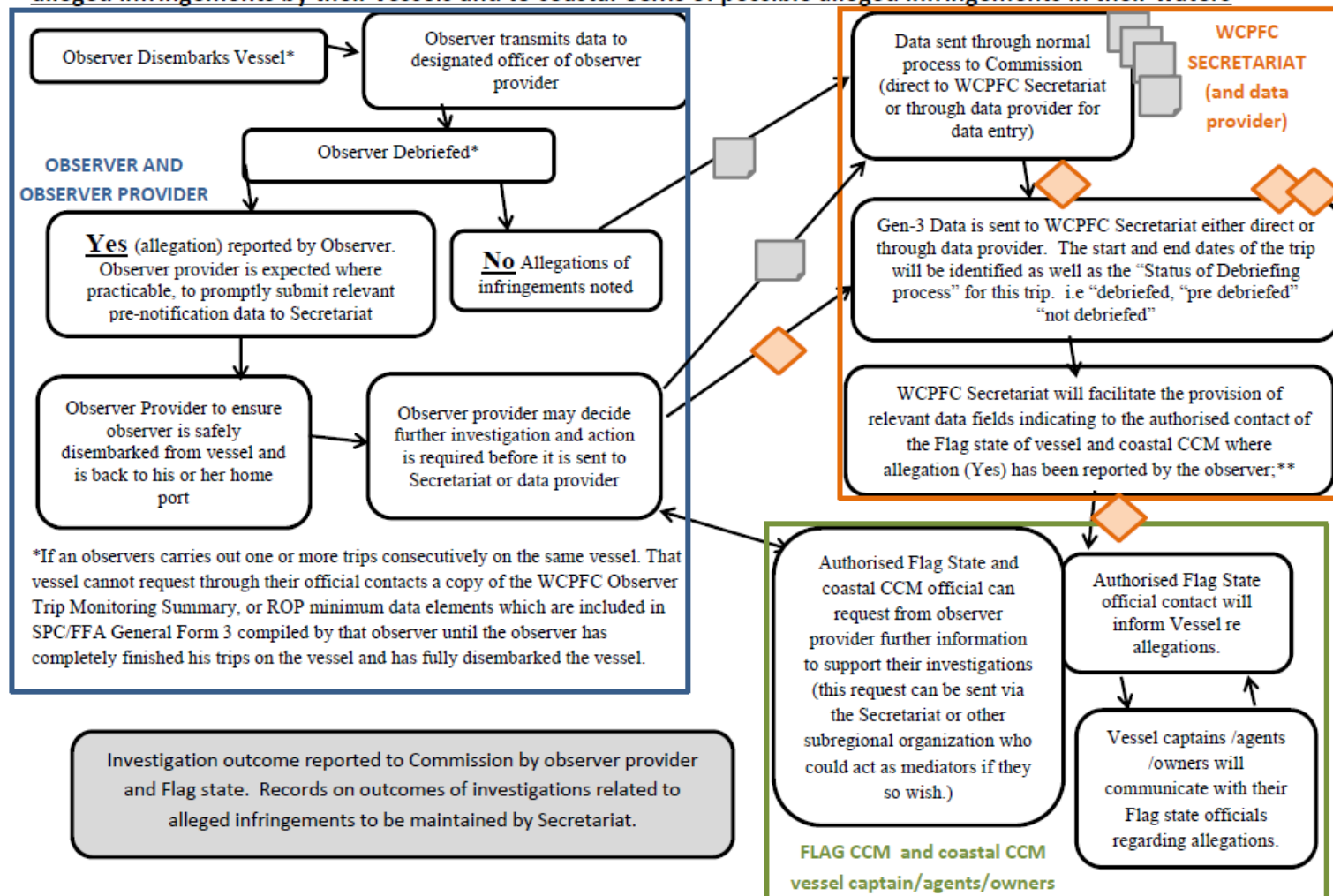
\*\*\* The Commission agreed that to support the pre-notification process, that there are two additional fields that should be provided by observer providers to support a flag CCMs investigations of any possible alleged infringements. These are:

1. “start date of trip and end date of trip”
2. “status of the debriefing process” i.e, “debriefed”, “pre debriefed” or “not debriefed”

**Final notes: The Commission agreed that there would be a six month delay before implementation of the pre-notification process commences, and approved the attached flowchart to illustrate the approved pre-notification process.**



**Schematic of Commission adopted Pre-Notification Process from observer providers to flag CCMs of possible alleged infringements by their vessels and to coastal CCMs of possible alleged infringements in their waters**



**\*\*Note:** that in accordance with the data rules, the information that is provided to flag CCM and as applicable coastal CCM will not include name of observer their nationality and the observer trip ID, but will instead identify the observer provider that placed the observer. The start and end dates of the trip will be identified as well as the "Status of Debriefing process" for this trip. i.e "debriefed", "pre debriefed" "not debriefed"