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REGIONAL OBSERVER PROVIDER – COMMISSION CCFS PROCESS FLOW

WCPFC-TCC21-2025-DP16

26 September 2025

Submitted by ROP-IWG Chair

Purpose

1. This paper provides the discussion paper that aims to support ROP-IWG participants in further reviewing and considering potential amendments to the pre-notification process adopted during WCPFC12.
2. It also provides updated information on the key points from the discussion on this paper at the ROPIWG6 meeting along with additional comments provided by CCMs on the proposed compliance case file system (CCFS) process flow to support ROP-IWG participant discussions. [Additional CCM comments received after the ROPIWG6 meeting through day 2 of the TCC21 meeting have been incorporated into this revised paper in tracked changes, for ease of review.](#)

Updated information

3. The following key points on the proposed process flow to streamline the transfer of information from observer reporting to the WCPFC Secretariat for inclusion in the Compliance Case File System (CCFS) were noted from the ROPIWG6 discussions on 20 June 2025. [These are further revised in tracked changes to reflect additional discussions that occurred after the ROPIWG6 meeting, including during the ROPIWG7 on 23 September 2025 through day 2 of the TCC21 meeting, 26 September 2025.](#)

- Support for the overall direction of the proposed revisions, particularly the incorporation of debriefing and national compliance evaluation into the [pre-CCFS case creation and pre-notification processes](#), to improve the evidentiary basis of potential infringement notifications.
- The need for careful consideration of the application of Article 25(2) of the Convention.¹ Some participants questioned whether all observer-sourced cases should be treated the same as cases arising from high seas boarding and inspection or port State measures, particularly given that observers may not be able to collect equivalent levels of evidence

¹ [Article 25\(2\) provides, in relevant part, “Each member of the Commission shall, at the request of any other member, and when provided with the relevant information, investigate fully any alleged violation by fishing vessels flying its flag of the provisions of this Convention or any conservation and management measure adopted by the Commission.” In practice, the requesting member is referred to as the “Initiating CCM.”](#)

(e.g., photographic or video documentation). As clarified, the issue is whether CCFS cases arising out of observer reporting are appropriately initiated by the Regional Observer Programmes (ROPs), rather than by CCMs, as set forth in Article 25(2).

- The importance of timely notification to flag States to allow meaningful investigations, and concern that current delays in the transmission of observer-derived data limit the effectiveness of follow-up actions.
- Support for integrating observer debriefing, data verification, and compliance evaluation into a unified step prior to the submission of information to the CCFS, as a way to streamline the process and avoid duplication.
- A proposal that early notification should encompass not only well-known categories such as obstruction or pollution, but also other issues such as potential infringements identified from set details, observer safety concerns, or incidents involving Species of Special Interest. To implement this proposal, the Commission could eliminate the use of “PAI” as a pre-notification case type and instead, assign each pre-notification case an infringement status of “Pre-notification,” which status would be updated to “NEW CASE” upon notified availability of the supporting Observer-sourced evidence.
- Clarification was sought on whether the full observer report would be transmitted through the revised data flow. Participants noted that the observer report remains a key reference document for initiating investigations and requested that its role be clearly reflected in the process diagram. CCMs have also noted that an agreed-upon definition of “observer report” would be helpful, to ensure that adequate information is provided to the responsible CCM in support of its investigation.
- A suggestion to improve the readability and utility of observer evidence within the CCFS, including clearer formatting of observer records and linking the same evidence to all related case entries.
- Acknowledgement of the value of introducing feedback mechanisms within the CCFS available to all parties with a direct role in the CCFS case, enabling Observer Providers CCMs and/or the Coastal State CCMs responsible for debriefing the relevant Observer-sourced data—as opposed to the Regional Observer Programmes themselves—to view or comment on the outcomes of flag State investigations and receive timely notifications on case developments.

4. The Chair of the ROP-IWG invited participants to provide written feedback. The following comments/interventions were received from CCMs.

JAPAN:

- Japan generally supports the direction of the proposed amendments to the pre-notification process. Specifically, incorporating debriefing and compliance evaluation by debriefer CCMs into the pre-notification process will result in the better documented and evidenced notifications of potential infringements observed on board.
- However, Japan does not support making all potential infringements observed on board uniformly subject to investigation requests under the Article 25 (2) due to difficulties in providing timely

notifications and sufficient evidence. To ensure effective investigations and actions by flag CCMs, it is practical to limit investigation requests under the Article 25 (2) to cases where timely notifications are possible and sufficient evidence is available.

- In addition, Japan supports the view expressed during ROP-IWG06 that the full observer report is a key reference document for initiating investigations and that its role should be clearly reflected in the pre-notification process.
- Japan is open to discussing minimum evidence standards for requesting an investigation request under the Article 25 (2) based on observer reports, as well as the standard timeframe for such requests.

PNA:

- PNA supports the approach as outlined in the paper to streamline the integration of ROP data in the CCFS and as detailed in Attachment 1.
- Stressed the need for a formal investigation request, supported by verified data, for all CCFS cases sourced from observers, in accordance with Article 25(2) and CMM 2018-05, paragraph 11.²
- To enhance data integrity, we support a verification process conducted by debriefers and compliance officers to eliminate false positives, with a clear clearance point for ROP data prior to submission to the SPC, avoiding redundant cycles between SPC, CCFS, and members. Additionally, we recommend providing appropriate training and funding for observer providers to strengthen the ROP data verification process.

Additional Comments from PNAO:³

- The idea that only OAI and POL [trip level] infringements from observers to undergo **Step 4** and early WCPFC CCFS at **Step 5** does not resolve the fact that delays in CCFS cases notified to flag CCMs will continue to persist noting that SPC will make ROP data after a year or so and it does help investigation where vessel is flag or crews have change and so forth.
- Suggested that all trips undergo Step 3-4, if compliance evaluation is done in Step 4 and validate that **NO** case needs flag state investigations, then that is the end of process where it then be submitted to SPC. But if **Step 4** confirms a possible violation of the lists of CMMs obligations [OAI, POL, FAI, SSIs/CWS, SHK etc.] listed under Agenda 3.1, then a formal investigation report is produced with supported and relevant investigative information to the Secretariat to enter into the CCFS and or generated to the flag CCMs for investigations. This will make it easier when pulling cases from CCFS to assess in the CMR, as it has more weight of a concern from an Observer Provider-CCM to Flag CCMs for ensuring CMMs implementations rather than the current process.
- **Side note:** What the Commission needs to do is to develop **“Debriefers/Compliance Analysis Standard Guidelines”** align to CCFS list of CMMs obligation listed in supplementary paper 01, as a checklist to what will be done in **Steps 3-4**. This will form part of the ROP data to indicate that a ROP trip data has undergone debriefing and compliance validation [a process done within 100 days window period], before the ROP data is submitted to SPC. We are doing this at PNA, and it should

² Under paragraph 11, “CCMs shall take advantage of the information collected by observers for the purpose of investigations,” including those initiated under Article 25(2) of the Convention, and they “shall cooperate in the exchange of such information, including by proactively requesting, responding to, and facilitating the fulfilment of requests for, copies of observer reports in accordance with standards adopted by the Commission, as applicable.”

³ These comments reference the “Steps,” as numbered in the original version of this paper, issued 8 Sept 2025.

be easier. In this way, ROP reported cases gets notified to flag CCM in a minimum of 1 week from disembarkation.

Background

5. The CCFS currently has three types of cases based on a WCPFC ROP observer's affirmative report of such events in Observer Trip Monitoring Summary Data:
 - a. **OAI:** Observer Obstruction Alleged Infringements (linked to [CMM 2018-05 15 \(g\)](#)).
 - b. **POL:** Marine Pollution Alleged Infringements (linked to [CMM 2017-04 02](#) or 03-07).
 - c. **PAI:** Pre-notification of Alleged Infringements (linked to the remaining ROP Pre-notification data elements (other than OAI and POL)).
6. For completeness, there are also three other types of cases which are currently created in CCFS based on specific observer data records:
 - a. **SHK:** Shark Catch Alleged Infringements. These are Cases for alleged infringements related to retention of oceanic white tip or silky sharks, or shark fining activity identified in ROP observer data (obligations in [CMM 2022-04](#)).
 - b. **CWS:** Cetacean and Whale Shark Interactions. 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 (obligations in [CMM 2011-03](#) and [CMM 2022-04](#)).
 - c. **FAI:** FAD Alleged Infringements. Cases for alleged infringements related to setting on FADs during the FAD closure period under the applicable tropical tuna CMM.
7. The OAI, POL and PAI cases are notified through the CCFS because the Commission (WCPFC12 in December 2015⁴) decided to adopt a pre-notification process from observer providers that:
 - a. Identified flag CCMs of possible alleged infringements by their vessels to a flag CCM; and
 - b. Identified Coastal State CCMs of possible alleged infringements in their waters ([WCPFC12 Summary Report](#) paragraph 569, Attachment U).
8. This [WCPFC12](#) decision tasks the [Commission's scientific data services provider \(SPC-OFP\)](#) 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 flag CCMs earlier notification of potential alleged infringements by their vessels.
9. Current issues identified include, but are not limited to:
 - WCPFC12 pre-notification process assumed a smooth flow of data from observer providers to WCPFC, and then to the flag CCM however, this hasn't worked as expected.

⁴ [WCPFC12 Summary Report](#) paragraph 569, Attachment U

- a. The CCFS Pre-notification process was based on the understanding that observers were to complete the ROP minimum data elements on the WCPFC Observer Trip Monitoring Summary. If a “YES” is noted, the observer provider is expected where practicable, to promptly submit relevant data to the Commission Secretariat (either through SPC-OFP or provided directly to the Secretariat).
- b. Presently, the remaining Minimum Standard Data Field (MSDF) Observer Trip Monitoring Summary codes (PAI other than OAI and POL), do not have a clear link to an obligation in a WCPFC Conservation and Management Measure (CMM) or a specific requirement in the Convention.
- c. The Commission has acknowledged the PAI cases (other than OAI and POL) 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.

10. Noting the scale of PAI cases in the CCFS (other than OAI and POL), resolving the issue of PAI cases is a priority task for the ROP-IWG in its [2023-2025 workplan](#) as it relates to the capture of information by observers.

- a. In practice, the current MSDF Observer Trip Monitoring Summary codes do not provide sufficient information to support data management procedures that define if the observed trip should be classified as ROP or non-ROP data. Consequently, the earlier notification to flag CCMs that was envisaged has not been practical to implement.
- b. In 2024, ways to utilise debriefing information in supporting reviews of PAI cases were suggested as part of ROP-IWG discussions.

11. The Commission has also acknowledged that the CWS cases in CCFS are an issue.

- ~~b.a. and~~ TCC17 (2021) agreed this CWS data would be excluded from consideration of the current trial process of reviewing the Aggregated Tables in the Compliance Monitoring Scheme (CMS).
- b. 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)). However, the current 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 and those interactions or actions by the crew that could indicate a potential CWS infringement has occurred.

12. There are a number of Species of Special Interest (SSI) obligations in CMMs [that are not currently captured by the observer-initiated CCFS cases.](#)

- a. [The ROP-IWG has discussed amending existing ROP data fields to capture alleged infringements of SSI obligations—including for seabirds \(CMM 2018-03\), sea turtles](#)

([CMM 2018-04](#)), mobulids ([CMM 2019-05](#)), and potentially [necessitating](#) refinements [to data fields](#) for sharks ([CMM 2024-05](#)) and cetaceans ([CMM 2024-07](#)).

- b. Although this would facilitate the creation of additional types of observer-initiated cases in the CCFS, the ROP data fields need to be reviewed [and revised](#) to support more clear identification of potential violations of SSI related obligations.
- c. [The tables starting on page 6 of WCPFC-TCC21-2025-17C rev01, which refine the ROP-IWG06 Working Paper 2 supplement 1 tables,](#) presents further detail on the obligations that could be considered for observer data collection to support monitoring implementation of [and compliance with](#) CMM obligations. [A summary table showing how the ROP-IWG’s proposed revised ROP data fields could be categorized within the CCFS has been added to WCPFC-TCC21-2025-17C rev01 for further consideration by the ROP-IWG.](#)

~~11.~~[13.](#) During TCC20, discussions led to taskings to the ROP-IWG related to the use of ROP data in the online Compliance Case File System (CCFS):

TCC20	TCC20 expressed concern over the delay in including cases arising from ROP data in the CCFS and recommends to the Commission that the question of streamlining the inclusion of ROP data in the CCFS be a task for the ROP-IWG. (<i>ref: TCC20 Outcomes, paragraph 16</i>)
	TCC20 agreed in principle that many of the ROP Minimum Standard data fields were redundant, particularly those related to vessel details, and are better collected through existing processes, such as vessel registration or the RFV. (<i>ref: TCC20 Outcomes, paragraph 48</i>)
	TCC20 recommended that the Commission at WCPFC21 task the ROP-IWG to prioritize in 2025 the review of the ROP Minimum Standard data fields, the review of the pre-notification process adopted during WCPFC12, and to develop a standardized process for the use of ROP data in the CCFS. (<i>ref: TCC20 Outcomes, paragraph 50</i>)

~~12.~~[14.](#) During the ROP-IWG05 meeting, points raised in the discussions included:

- a. The pre-notification process had the good intention of providing early advice to flag CCMs of potential alleged violations by their vessels however, what was intended has not been possible.
- b. Noting that the WCPFC CCFS aims to assist flag CCMs with tracking alleged violations by their flagged vessels, and the observer programs are intended to support monitoring the implementation of conservation and management measures (CMMs).
- c. Considering whether processes and standards can be agreed with a view to ensuring that the ROP data recorded by observers is of a standard that is sufficient for supporting flag CCM investigations of WCPFC CCFS cases. Perhaps there needs to be guidance on the package of information that should accompany each CCFS case.
- d. Should debriefers or coordinators undertake a verification of the Observer Trip data before it is used to develop WCPFC CCFS cases, and if so, how should the information from debriefers flow to WCPFC so it can support the WCPFC CCFS case process and flag CCM investigations.

- e. The lack of clear linkage to most CMMs in the current data fields in the Observer Trip Monitoring Summary section is an issue. For example, much of the observer trip monitoring summary data is not useful for the purpose of the CCFS. Only RS-a to RS-d, WC-c, PN-a, and perhaps LC-a to LC-f is sufficiently useful for the CCFS.
- f. When reviewing the MSDF Observer Trip Monitoring Summary codes, it will be necessary to distinguish what is needed for national purposes *vis-a-vis* the data and information that is specifically needed for CCFS/CMS -purposes.

Discussion

15. It is a flag CCM's responsibility to investigate activities of their vessels and potential alleged infringements. Observer providers are assisting flag CCM with meeting their obligations. In accordance with [CMM 2023-04 Conservation and Management Measure for the Compliance Monitoring Scheme](#), the CCFS already facilitates viewing by relevant CCMs to notified cases, including the flag CCM, and where applicable the ROP observer provider, the inspecting/notifying CCM, the coastal CCM, and the chartering CCM. [Questions have been raised regarding who is the appropriate entity to be given access to CCFS case pages arising out of observer data.](#)

- a. [Currently, only the Regional Observer Programmes appear to have access to relevant CCFS case pages on behalf of Observer Provider CCMs and Coastal State CCMs responsible for debriefing, which does not align with the language in Article 25\(2\) regarding requests for investigations by \("Initiating"\) CCMs.](#)
- b. [CCFS case access procedures could be revised to ensure that an "Initiating CCM" who has processed the observer data is provided access to every observer-sourced CCFS case. Such an "Initiating CCM" could be either the Observer Provider CCM or the Coastal State CCM doing the debriefing of an Observer's data to initiate a CCM request per Article 25\(2\). If there is capacity for technical refinements to the electronic CCFS to allow for multiple Initiating CCMs, then both the Observer Provider CCM and the Coastal State CCM responsible for debriefing would be provided CCFS case access.](#)

16. Observer Provider [CCMs and/or Coastal State CCMs responsible for Observer data debriefing](#) could be requested to play a greater role in supporting the notification of potential infringements identified and described by observers in their reported [data](#).

- a. Care is needed to ensure that Observer Provider [CCMs and/or Coastal State CCMs responsible for Observer data debriefing](#) are sufficiently resourced to support this additional task, for example they have access to training and funding for debriefing to ensure an [evidentiary](#) report of the event (rather than just an affirmation of one occurring) has been captured.
- b. A draft schematic of the Commission's CCFS process flow is provided in Attachment 1 (below), [as revised](#).

17. The ROP-IWG's review that is currently underway to consider refinements to the MSDFs including those in the Observer Trip Monitoring Summary continues to be important in supporting any updated pre-notification/CCFS process and in addressing the definition of an interaction.

- ~~6~~.a. The results of the ROP-IWG's discussions on this issue are reflected in [WCPFC-TCC21-2025-17C rev01 \(refining the ROP-IWG06 Working Paper 2 supplement 1\)](#), which presents a list of the obligations in CMMs where the ROP-IWG has determined that observers could collect data that can be used to monitor implementation of and compliance with obligations in various CMMs, including potential alleged infringements which could be supported by observer data collection, will be a very important next step.
- b. The review of the Observer Trip Monitoring Summary should consider that some of the data fields support national requirements, e.g. Coastal State CCM laws and requirements. Any changes to the data fields and pre-notification process should duly take this into account.

~~13~~.18. Based on [the ROP-IWG's review of](#) the MSDFs and [its consideration of](#) the types of cases [that could be](#) generated through observer reporting against those data fields, the following paragraphs consider different categories of potential infringements that are likely to require management through the different data flows in Attachment 1. These categories reflect the potential complexity and seriousness of observed potential infringements that could be described in an observer's report.

- a. **Observer Obstruction/Safety Events:** The observer obstructions potential infringements are matters that would be usefully supported by Observer Provider [CCMs and/or Coastal State CCMs responsible for debriefing Observer data](#) having a greater role in reviewing and considering if an alleged infringement needs investigation and notification to the Commission. Currently **CCFS OAI** cases are created based on these codes in the Observer Trip Monitoring Summary data, but some amendments to the Observer Trip Monitoring Summary could be considered if this would further support the CCFS process. A modified notification process for these OAI CCFS cases could be based on the Attachment 1 process flow through to an Article 25(2) approach reflecting [a CCM-driven case referral process pursuant to Article 25\(2\) and](#) the priority of such potential infringements.
- b. **Other potential infringements of CMMs that could be supported by the Observer Trip Monitoring Summary data fields with some modifications.** Currently, **CCFS POL** cases are created based on these codes in the Observer Trip Monitoring Summary data, and **CCFS SHK** cases are created based on specific observer data records, and in addition some amendments to the Observer Trip Monitoring Summary could be considered if this would further support the notification to CCFS process. There are some other potential infringements of CMMs, which are identified in [WCPFC-TCC21-2025-17C rev01 \(refining ROP-IWG06 Working Paper 2 supplement 1\)](#), where with appropriate amendments to the Observer Trip Monitoring Summary data fields and additional training support for debriefing, observer providers could support a notification process to the Commission. A modified notification process for these types of current and new CCFS cases could be based on the Attachment 1 process flow through to an Article 25(2) approach for those of higher priority.
- c. **A smaller subset of potential infringements of CMMs, where some closer review by the Secretariat and flag CCM of the ROP data fields would still be necessary.** This is because there is information that is notified by the Secretariat by CCMs, which is currently only published as part of annual reporting. This means that the specific information needed to support consideration of cases is not available routinely outside of the Secretariat. **Current CCFS FAI** cases are created by the Secretariat based on specified observer data

records, and a review of individual CCMs notified information to the Secretariat. Questions remain about whether this information to support these reviews should be made available more routinely on the public side of the WCPFC website, and also whether it should be available and understood by Observers before they depart on their trip or at the time of debriefing. For these types of cases, there would continue to be a role for the Secretariat in developing CCFS cases. For example, and as is explained in [WCPFC-TCC21-2025-17C_rev01 \(which refines the tables in ROP-IWG06 Working Paper 2 supplement 1\)](#), additional 1-month high seas FAD closure choice for a flag CCM ([CMM 2023-01 14](#)), 3IA notifications for exemption from 1 ½ month FAD Closure in certain PNA EEZs ([CMM 2023-01 13 footnote 1](#)). There are some CMMs where a CCM notifies a choice of mitigation measure that would be similar to FAI cases.

- [19.](#) Potential changes to the observer data flows will require further implementation considerations including the need for adjustments to data collection, including E-reporting systems, will need time and resources, training and documentation would be needed to support enhanced data flow processes, some Observer Provider [grammesCCMs and/or Coastal State CCMs responsible for debriefing Observer data](#) will need additional resources and training for debriefers and compliance teams before they can meet the expected processes, the current data flows for potential infringements between SPC and the Secretariat, and changes to the Compliance Case File System.

Next steps

- [20.](#) The ROP-IWG Chair requests further feedback and views on this discussion paper [during the Small Working Group \(SWG\) session to be held during TCC21 on 27 September 2025.](#)
- [21.](#) The ROP-IWG Chair requests that the ROP-IWG offer recommendations for TCC21 to bring to WCPFC22 targeting the IWG's consensus path forward for improving the use of ROP data in the CCFS. Draft recommendations to guide the TCC21 ROP-IWG's SWG discussion on 27 September 2025 follow.

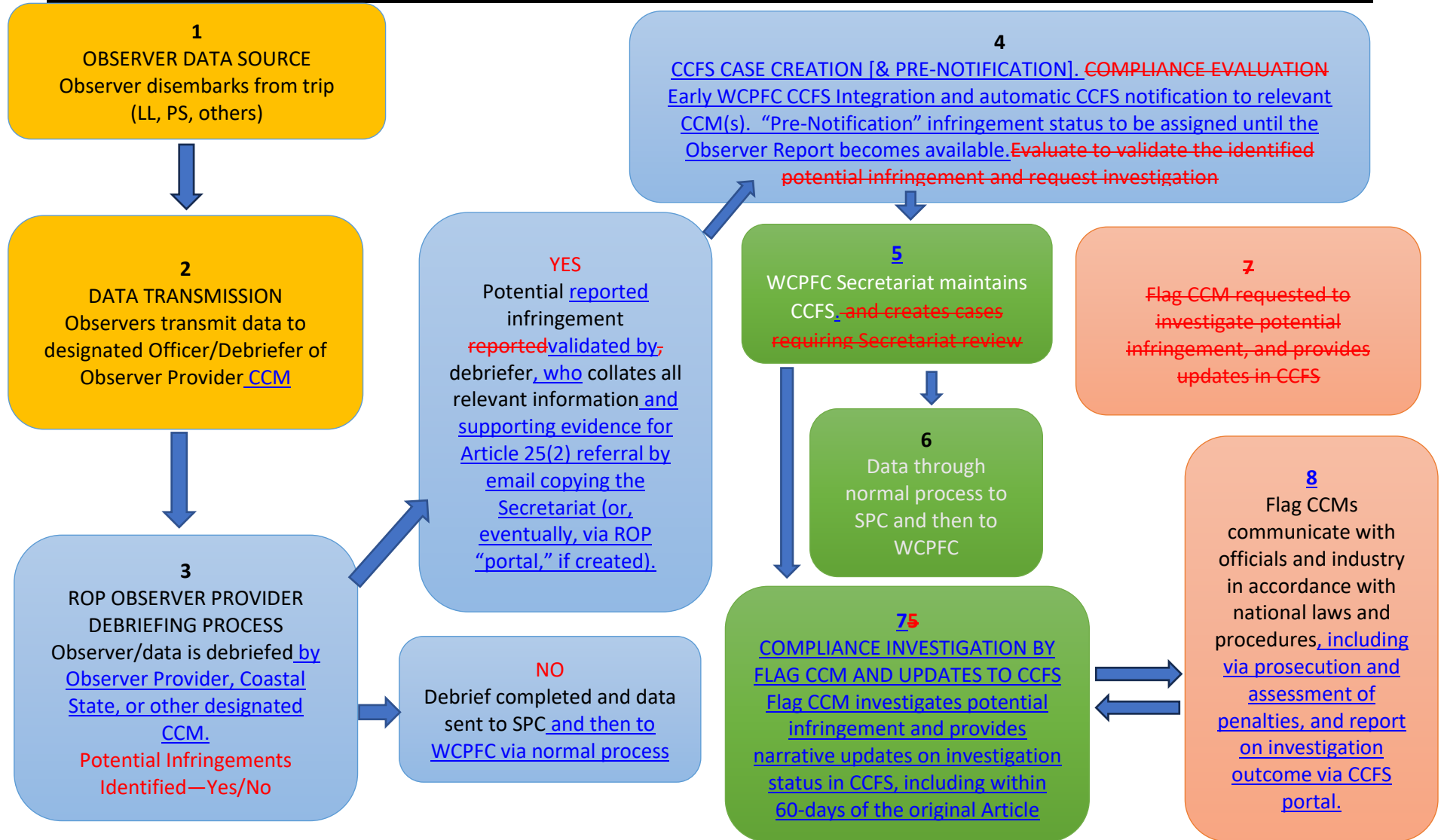
TCC21 adopted recommendations by the ROP-IWG, including:

- [1. TCC21 recommend that WCPFC22 adopt the ROP-IWG's proposed Observer data-to-CCFS Process Flow, as set forth in Attachment 1 to WCPFC-TCC21-2025-17B_rev01.](#)
- [2. TCC21 task the Secretariat with a feasibility analysis for presentation during WCPFC22 of the resources necessary to implement technical improvements to the CCFS, including:](#)
 - [a. Creation of an online "ROP Portal" similar to the new WCPFC online "HSBI Portal," that would allow for Observer Provider CCMs and/or Coastal State CCMs responsible for debriefing Observer data to enter details and upload evidence for creation of a CCFS case file for CCFS-facilitated-transmission to the responsible CCM, copying the Secretariat, pursuant to Convention Article 25\(2\)](#)
 - [b. Revision of CCFS case access protocols to ensure that an "Initiating CCM" providing observer data used in the CCFS has access to every Observer-sourced CCFS case page. This assessment should review and compare the feasibility of this proposal for one or multiple Initiating CCMs.](#)
 - [c. Creation of a new, "Pre-Notification" infringement status, for use in pre-](#)

notifications of Observer-sourced CCFS case referrals, to replace the current "PAI" case type indicator assigned to such cases. All Observer-sourced CCFS case types to reflect the substance of its alleged infringements, as set forth WCPFC-TCC21-2025-17C rev01.

3. WCPFC22 adopt a definition of "observer report" to include all Observer-derived ROP data and all supporting evidence collected by the Observer in support of an alleged infringement to be referred for case creation in the CCFS.
4. WCPFC22 task the Secretariat and ROPs with implementing the ROP-IWG's amended list of MSDFs for use in compliance monitoring, as set forth in the summary table and detailed MSDF tables in WCPFC-TCC21-2025-17C rev01.

Observer Provider – Commission CCFS process flow



Investigation outcome reported to Commission by Observer Provider and Flag state. Responses from other interested parties were relevant. Records of outcomes of investigations related to alleged infringements to be maintained Flag CCM and any other parties to the Case. Case progress review process administered by the WCPFC Secretariat

Notes:

1. Observer Data Source

- Observer disembarks
- Once the observer disembarks in port (home or foreign) the trip report is expected to be 90% complete
- Observer will notify observer provider to arrange for debrief and repatriation
CMM (agreed minimum standards and guides of ROPs) Standard requirement - IWGROP2/TCC4/WCPFC5

Note that the requirements set out in [CMM 2017-03 Conservation and Management Measure for the protection of WCPFC Regional Observer Programme Observers](#) would also apply to matters related to the health, safety and welfare of observers.

2. Data transmission

- Observer provides trip data either through hard copy in port or by ER processes (observer – ER database)
- It is recognized that within the Pacific Islands region, there are often existing arrangements that facilitate an observer being debriefed by another observer provider. For example, SBOB on POA trip is debriefed by PGOB debriefer.

3. ROP Observer Provider Debriefing Process

Pre-debrief is the preliminary data quality check on data provided by the observer when completing the Trip Monitoring Summary.

- Observer disembarks from a ROP trip; the Observer Trip Monitoring Summary is submitted to Observer provider debriefers to validate and evaluate any YES on the Observer Trip Monitoring Summary, that identifies a potential infringement that requires further review.
- The observer provider responsible is to ensure that the observer is safely disembarked from the vessel and, if operating under a subregional observer placement, that the observer has necessary transport arrangements to get them safely back to his/her home port.

Debrief: Debriefing is undertaken in accordance with national processes and standards. The debriefer validates and evaluates any YES on the Observer Trip Monitoring Summary, that identifies a potential infringement that requires further review and summarises findings for further review.

4. ~~Compliance Evaluation~~

- Collated findings go through an additional validation review by the Observer Provider CCM (taking into account categories described in paragraph 12 above which would inform a 'standard check' for the evaluation.)
- Observer Provider CCM validates the Observer trip monitoring summary data affirming a potential infringement has sufficient supporting evidence, such as observer journal pages or photos.

- If the potential infringement is a false positive or not genuine violation and/or is not supported by evidence, the Observer Provider would complete summary notation to accompany the Observers Trip data that explains that the Observer Trip Monitoring Summary data has been fully validated and that there are no potential infringements. The process stops here.
- If following validation, it is established that there are potential infringements in the Observer Trip Monitoring Summary data and/or ROP data the Observer Provider (CCM) would complete a “CCFS notification report” accompanied with relevant data and supporting evidence.
- The observer provider as CCM submits a formal request to the flag CCM to investigate the potential infringement, as required by Article 25(2) of the Convention and [paragraph 11 of CMM 2018-05](#). The formal request is transmitted via email ([or, eventually, via an online “ROP portal,” if created](#)), and a copy goes to the WCPFC Secretariat. ~~The process continues to Step 5 and Step 7.~~

5.4. Early CCFS [Case Creation \[and Pre-Notification\]](#) ~~Integration~~

- ~~Once a formal request is made~~ ~~and the investigation begins~~, the case is entered into the CCFS by the Secretariat for tracking and centralized record-keeping of the flag CCM's investigation of the case from its inception through to its conclusion.

6.5. [Secretariat maintains the CCFS.](#)

- The Secretariat shall maintain the WCPFC online CCFS as a secure, searchable system to store, manage and make available information to assist CCMs with tracking alleged violations by their flagged vessels. The information in the CCFS will be used in the CMS in accordance with [CMM 2023-04 Conservation and Management Measure for the Compliance Monitoring Scheme](#), or its replacement CMM.

7.6. [Data sent through to normal process to Commission \(WCPFC\)](#)

- Observer providers submit data to WCPFC Scientific Data Manager (SPC)
- WCPFC Scientific Data Manager (SPC) makes ROP observer data available to the Commission (WCPFC)
- Secretariat reviews ROP data for the types of potential infringements of CMMs where a closer review by the Secretariat of the ROP data fields and Secretariat held information as necessary.

8.7. [Flag CCM and other parties act on notification of a potential infringement and investigate, prosecute, and penalize proven infringements in accordance with national laws](#)

- The flag CCM initiates a full investigation and provides progress reports within two months, per Article 25(2) through the CCFS.