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Updated Working Draft Scope of Monitoring for Potential Infringements for the WCPFC Compliance Case File System Cases

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Submitted by the ROP-IWG Chair
(as provided to TCC21 - feedback requested)

TECHNICAL AND COMPLIANCE COMMITTEE
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UPDATED WORKING DRAFT SCOPE OF MONITORING FOR POTENTIAL INFRINGEMENTS FOR THE WCPFC COMPLIANCE CASE FILE SYSTEM CASES

WCPFC-TCC21-2025-17C_rev1[1]
29 September 2025

Submitted by the ROP-IWG Chair

Purpose

1. This paper proposes updates to the ROP Minimum Standard Data Fields (MSDF) to add or revise fields to better monitor newer or updated CMMs, clarify data reporting for scientific versus compliance purposes, and improve how ROP data feeds into the WCPFC Case File System (CCFS).

2. It also provides updated information on the key points from the discussion on this paper at the ROP-IWG6 meeting along with additional comments provided by CCMs on the proposed CCFS process flow to support ROP-IWG participant discussions.

3. The ROP-IWG Chair requests further feedback and views on this working draft by **October 10, 2025.**

Updated information

4. At SC21 held between 13 – 21 August 2025, the following recommendation was made during discussions on management advice relating to oceanic whitetip sharks (Agenda item 4.6):

> *"SC21 recommended that the IWG-ROP assess and identify specific data gaps for enhancements needed in order to improve the accuracy and consistency of shark species identification and reporting, noting lower reporting rates of oceanic whitetip sharks by observers relative to logbooks in some regions and diminishing levels of length records since the implementation of CMM 2011-04."* (SC21 Outcomes Document, paragraph 104)

5. The following key points on the proposed approach to address current issues with the MSDFs and their use in CCFS were noted from the ROPIWG6 discussions on 20 June 2025.

[1] Rev 1 presents an updated working draft of the tables reflecting discussions amongst ROP-IWG participants during TCC21

- Support for simplifying and prioritizing the Observer Trip Monitoring Summary by focusing on clearly verifiable infringements, while avoiding an overly lengthy checklist that might increase the burden on observers. It was suggested that yes/no indicators be considered as an initial step for certain obligations.
- Reservations about incorporating non-binding or "encouraged" provisions from CMMs into the MSDFs, with concerns that these may create implementation challenges for CCMs lacking domestic regulation in those areas. One participant proposed that CMM 2017-04 04-05 be excluded from the table.
- Questions were raised about the practicality of observers verifying technical obligations, such as tori line specifications or bycatch mitigation measures, noting that some determinations might be too complex for individual observers without additional tools or team-based inspection.
- Several participants indicated that questions related to observer obstruction, marine pollution, and fishing on data buoys should be retained or handled at the debriefing stage, rather than formalized as required fields in the Observer Trip Monitoring Summary.
- A suggestion was made to make key materials such as the FAD closure measure publicly available and distributed to observer providers in advance of observer placements, to improve awareness and reporting accuracy.
- It was noted that some fields already covered in other ROP forms (e.g., sighting time for Species of Special Interest in the PS-3 form) may not need duplication in the Observer Trip Monitoring Summary.
- Concern was expressed about placing too much emphasis on asking observers or debriefers to interpret obligations or to as subjective matters such as the intent of a vessels crew, and it was recommended that data fields be limited to those that observers are clearly trained to record or 'monitor' which do not require interpretation.

The Secretariat acknowledged the feedback and clarified that the ongoing review of the Minimum Standard Data Fields (MSDFs) is intended to address issues that have emerged in the use of ROP data within the Compliance Case File System (CCFS). It was noted that several years have passed since the MSDFs were initially developed, and a table was prepared in recognition that a review of the alignment of observer data to CMM obligations is timely to support the ROP-IWGs consideration of where refinements to the MSDFs may be needed. The overarching objective is to ensure that observer data can effectively meet the purpose in Article 28 of the Convention, to support the monitoring of the implementation of the various Conservation and Management Measures (CMMs) adopted by the Commission.

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

JAPAN:

- Japan suggests considering three types of obligations at a later stage.
  (1) Provisions requiring some closer review by the Secretariat, as mentioned in the Working Paper 1.

(2) Provisions based on subjective determinations or interpretations by observers.

(3) Non-binding or "encouraged" provisions.

- Japan also suggests prioritizing provisions that can be verified through an investigation by flag CCMs, such as the prohibition of retention and the provisions relating to fishing gear specifications.

PNA:

- **Observer Obstruction [CMM 2018-05]:** Support the current obligation under paragraph 15(g) with MSDFs in RS-a to RS-d in the GEN-3 Form. No changes to MSDFs proposed; Support including a summary comment.

- **Driftnet Prohibition [CMM 2008-04 02]:** Captured in diary/report. Regarding the Secretariat's proposal to add a Yes/No question on GEN-3, suggest omitting it and retaining it for the debriefing process, as it has a low impact currently.

- **Fishing on Data Buoys Prohibition [CMM 2009-05 01, 03, 05]:** Captured in diary/report/journal. Regarding the Secretariat's suggestion to add Yes/No questions, recommend keeping it at the debriefing level as it is of low impact currently.

- **Marine Pollution [CMM 2017-04]:** Support current obligation under paragraph 2 with MSDFs PN-a to PN-e in the GEN-3 Form. Regarding proposed refinements (discharge scale and gear retrieval efforts), endorse PNA's view that only PN-a is useful for CCFS. Suggest the Secretariat's comment on collecting ALDFG retrieval data is better suited for CCM reporting, not CCFS.

- **FAD Closures [CMM 2023-01]:** Support current obligations under paragraphs 13-14, MSDFs (school association, location), and GEN-3 WC-c. No changes proposed, but recommend the Secretariat make CCM FAD exemption notifications publicly available on the website and circulate them widely to observer providers for better observer awareness during placement as suggested in the paper.

- **SSIs [Seabirds, Sharks, Cetaceans, Mobulids, Turtles]:** MSDFs capture interactions in PS-3 and GEN-2. Regarding proposed new fields (e.g., SSI sighting time, encirclement) for compliance with CMMs 2018-03 (Seabirds at 30S), 2024-05 (Shark), and 2024-07 (Cetaceans). On adding new fields for SSI sighting time and encirclement, this MSDF is already captured in PS-3 form and suggest leaving it out.

- **Proposals for Yes/No Questions in Observer Trip Monitoring Summary:** Regarding suggestions to add Yes/No questions for specific infringements (e.g., sharkfin storage, cetacean retention) and review MSDFs for sufficient documentation, recommend addressing these during debriefing to avoid overburdening observers with additional data fields.

7. Between the ROP-IWG06 meeting and the ROP-IWG07 meeting before TCC21, the United States submitted a delegation paper, including a table integrating and summarizing the ROP-IWG's work on

identifying and classifying updated MSDFs, as shown below. The table is intended as a summary of what the ROP-IWG agrees upon, once finalized, and is not an independent proposal.

Background

8. At ROP-IWG05 several current issues with the MSDFs and their use in CCFS were identified. In addition, over the course of ROP-IWG and other meetings, we have reviewed and discussed suggested refinements to MSDF data fields, and in some cases the aim is to support monitoring implementation of CMMs.

9. The table presented here provides a list of the obligations in CMMs where observers could collect data that can be used to monitor implementation of CMMs, including potential infringements. For each obligation some notes have been prepared describing what scientific monitoring needs and potential compliance issues for data collection by observers might be. Notes have also been provided about where the current MSDFs include some data collection, where CCFS cases have been created, and/or where there are proposals in ROP-IWG06 Working Paper 2 that may be relevant to the monitoring of the obligation. The list of topics presented in the Table are the following:
    - Observer Obstruction
    - Driftnet Prohibition
    - Fishing on data buoys prohibition
    - Marine Pollution
    - FAD Closure – Tropical Purse Seine
    - Seabirds
    - Sea Turtles
    - Mobulid Rays
    - Sharks
    - Whale Sharks
    - Cetaceans

10. ROP-IWG participants will be invited to share views, proposals and comments on the scope of potential infringements to be covered by ROP observer data collection for WCPFC CCFS Cases.

11. Some questions to support participants consideration of the Table include:
    i. Which of the obligations and potential compliance issues listed in the Table should be a high priority for data collection by ROP observers to support monitoring implementation of CMMs?
    ii. Are there any obligations and potential compliance issues that should not be included in the Table (or are of low priority) for observers to support monitoring implementation of CMMs?
    iii. For each obligation and potential compliance issue which is a priority for monitoring by ROP observers, are refinements to the MSDFs needed? If so, should the data collection by ROP observers be achieved through refinements to the Observer Trip Monitoring Summary (at the trip level) and/or the data fields at the set-level?
    iv. Are there any additional obligations and potential compliance issues that should be added into the Table which are of high priority for data collection by ROP observers to support monitoring implementation of CMMs?

v. What are the specific refinements that are needed to the MSDFs for each obligation or potential compliance issue, or what would be the process and timeframes for proposals to be developed?

Summary of Obligations and Proposed Case Type Identifiers for Observer-sourced CCFS Cases[2]

Type	Description	Relevant CMMs
POL (same as current)	Marine Pollution *(including required prohibition on vessel discharge any non-fishing gear plastics and encouragements to CCMs regarding additional marine pollution measures and reporting of gear loss)*	CMM 2017-04 (for Marine Pollution; eff. 01 Jan 2019 - Current) - CMM 2017-04 **02** - CMM 2017-04 **05**[3]
FAD (currently "FAI")	Fishing on Data Buoys *(including prohibition on fishing within 1 nautical mile or interacting with data buoys on the high seas and adherence to various requirements in the case of entanglement)* and FAD closures for Tropical Purse Seine Vessels *(including prohibition on setting on FADs in EEZ waters or high seas of the Convention Area during the 1.5-month FAD closure and for one additional month of FAD Closure period that the Flag State has chosen)*	CMM 2023-01 (for Bigeye, Yellowfin and Skipjack Tuna in the Western & Central Pacific Ocean; eff. 06 Feb 2024 - Current) - CMM 2023-01 **13** - CMM 2023-01 **14** CMM 2009-05 (Prohibiting Fishing on Data Buoys; eff. 09 Feb 2010 - Current) - CMM 2009-05 **01, 03, 05**
CWS (same as current)	Interactions with Cetaceans *(including prohibition on purse seine ("**PS**") setting on cetaceans if animal is sighted prior to commencement of the set; requirements in the event of unintentional circling of cetaceans in the PS net, including incident reporting; the prohibition on all vessels (PS and longline ("**LL**")) from harvesting, retaining onboard, transshipping, or landing any cetacean, in whole or any part thereof, in the Convention Area; and the requirement that LL vessels release, taking into account the safety of the crew, any cetacean that is caught or entangled by its fishing gear in the Convention Area as soon as possible and in a manner that results in as little harm to the cetacean as possible and utilizing the Best Practices for the Safe Handling and Release of Cetaceans, if possible)*; and Interactions with Whale Sharks *(including prohibition on PS setting on whale sharks and on retention/ transshipment)*	**Cetaceans**: CMM 2024-07 (for Protection of Cetaceans from PS & LL Fishing Operations; eff. 01 July - Current) - CMM 2024-07 **01-04**[4] **Whale Sharks**: CMM 2024-05 (for Sharks; eff. 01 Feb 2025 - Current). - CMM 2024-05 **25 (01-07)**[5]
OBS (currently "OAI")	Observer Obstruction	CMM 2018-05 (for the ROP; eff. 12 Feb 2019 - Current) - CMM 2018-05 **15(g)**

[2] The Case Types described here are not listed by how the alleged infringement is identified in observer data, as clarification of that process is forthcoming. *See* WCPFC-ROP-IWG05-2025-04 (ROP-IWG workplan).

[3] The U.S. agrees with ROP-IWG's recommendation but notes that paragraph 05 is only an *encouragement*.

[4] The ROP-IWG identified the obligations in CMM 2024-07, which superseded CMM 2011-03. The relevant obligations are described in: CMM 2011-03 **01**, CMM 2011-03 **02**, CMM 2011-03 **03**, and CMM 2011-03 **05**.

[5] CMM 2024-05 supersedes CMM 2022-04, CMM 2019-04 (Sharks), and CMM 2012-04 (Whale Sharks).

Type	Description	Relevant CMMs
DNS (NEW)	Driftnet regulations *(including prohibition on the use of large-scale driftnets on the high seas)*	CMM 2008-04 (to Prohibit the Use of Large Scale Driftnets on the High Seas of the Convention Area; eff. 10 Feb 2009 - Current) - CMM 2008-04 **02**
SHK (same as current)	Shark Catch *(including prohibitions on shark finning (including transshipment of fins), retention on board of sharks (including for crew consumption), provisions intended to minimize bycatch of sharks in certain LL fisheries, the preference for hauling non-retained sharks alongside for species identification, and various requirements related to Silky Sharks and Oceanic White Tip sharks specifically, among others)*	CMM 2024-05 (for Sharks; eff. 01 Feb 2025 - Current).[6] - CMM 2024-05 **07-09** - CMM 2024-05 **14** - CMM 2024-05 **15** - CMM 2024-05 **18** - CMM 2024-05 **21** - CMM 2024-05 **24 (01-03)**
RAY (NEW)	Mobulid Rays *(including prohibitions on the retention, transshipment, storing, or landing of mobulid rays, as well as the targeted fishing or intentional setting on them)*	CMM 2019-05 (for Mobulid Rays caught in association with fisheries in the WCPFC Convention Area; eff. 01 Jan 2021 - Current). - CMM 2019-05 **(04-06, 08, 10)** - CMM 2019-05 **03**
TUR (NEW)	Sea Turtles *(including CMMs ensuring that fishermen use proper mitigation and handling techniques and foster the recovery of any incidentally captured turtles before returning them to the water, requiring LL vessels to carry and use certain equipment for the prompt handling and release of incidental bycatch, and imposing mitigation requirements for shallow-set LL vessels)*	CMM 2018-04 (of Sea Turtles; eff. 01 Jan 2020 - Current). - CMM 2018-04 **04** - CMM 2018-04 **06** - CMM 2018-04 **07** (a, b)
BIR (NEW)	Seabirds *(including: Required longline mitigation measures to reduce incidental catch of seabirds applying north of 23N or south of 25S. i. use at least two mitigation measures in paragraph 1(a) or hook shielding devices when fishing south of 30°S ii. use one of the mitigation measures in paragraph 2 when fishing in area 25°S-30°S iii. 24m or more in overall length, to use at least two mitigation measures in paragraph 6, Table 1; and including at least one from Column A when fishing north of 23°N iv. less than 24m in overall length, to use at least one of the mitigation measures from Column A in Table 1,when fishing north of 23°N)*	CMM 2018-03 (to mitigate the impact of fishing for highly migratory fish stocks on seabirds; eff. 12 Feb 2019 - Current) - CMM 2018-03 **01, 02, 06**

[6] CMM 2010-07 (Sharks) and CMM 2013-08 (Silky Sharks) were superseded by CMM 2019-04 (Sharks), and subsequently by CMM 2022-04 (Sharks), and CMM 2024-05 (eff. 01 Feb 2025 - Current). Although CMM 2011-04 (Oceanic Whitetip Sharks) was effective until 01 Nov 2020 and does not appear to have been superseded, paragraph 24 of the currently effective CMM 2024-05 includes specific requirements to protect these species.

Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	*ALTERNATIVE OR SUPPLEMENTARY COMMENTS*
OBSERVER OBSTRUCTION				
CMM 2018-05 15 (g) Observer Obstruction Incidents PNA[7] supports maintaining this paragraph	n/a	vessel operator or any crew member assaulted, obstructed, resisted, delayed, refused boarding to, intimidated or interfered with an observer in the performance of their duties vessel operator or any crew member requested that an event not be reported by the observer vessel operator failed 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	**Current MSDF** - Observer Trip Monitoring Summary Issue Code (RS-A, RS-B and RS-D);(Yes No) – **Current CCFS OAI** cases are created based on Observer Trip Monitoring Summary data	**Secretariat comment:** *No change to questions needed - could consider including some summary comment on the Observer Trip Monitoring Summary* **PNA** supports suggestion for a summary comment

[7] PNA members including Tokelau and Vanuatu

Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	*ALTERNATIVE OR SUPPLEMENTARY COMMENTS*
		officer on board the vessel		
DRIFTNET PROHIBITION				
CMM 2008-04 02 Prohibit use of large-scale driftnets on the high seas PNA supports maintaining	n/a	vessel had on board and/or deployed large-scale driftnet in high seas of Convention Area	*Currently covered in training of Pacific Island Observer Programmes, with instructions to include in the observer diary/report*	**Secretariat comment:** *Could be a new yes no question on Observer Trip Monitoring Summary, with summary comment* ***PNA** comment: Suggest leaving it out and keep it for debriefing process as no high impact on it at the moment*
FISHING ON DATA BUOYS PROHIBITION				
CMM 2009-05 01, 03, 05 Prohibit their fishing vessels from fishing within 1 nautical mile of or interacting with a data buoy in the high seas, and implement requirements in the case of entanglement PNA support to maintain para 01 and 03 but question mark about para 05 if it is observer level or CCM level obligation	n/a	vessel had a gear entanglement with a data buoy, or intentionally interacted with a data buoy, including intentional taking on board	*Currently covered in training of Pacific Island Observer Programmes, with instructions to include in the observer diary/report*	**Secretariat comment:** *Could be a new yes no question on Observer Trip Monitoring Summary, with summary comment* ***PNA** comment: Suggest leaving it out and keep it for debriefing process*
MARINE POLLUTION				

Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	*ALTERNATIVE OR SUPPLEMENTARY COMMENTS*
CMM 2017-04 02 Prohibit fishing vessels from discharging any plastics (including plastic packaging, items containing plastic and polystyrene) but not including fishing gear PNA support to maintain	n/a	vessel discharged plastics (including plastic packaging, items containing plastic and polystyrene)	**current MSDF** - Observer Trip Monitoring Summary Issue Code (PN-A) dispose of any metals, plastics, old fishing gear or chemicals;(Yes No) **Current CCFS POL** cases are created based on Observer Trip Monitoring Summary data *Currently there are some additional data collection by Pacific Island Observer Programmes, with instructions to include in the observer diary/report*	**Secretariat comment:** *Could be a revised yes no question on Observer Trip Monitoring Summary, and would be useful to also collect some data fields related to the scale and how the discharge occurred* ***PNA** comment: only PN-a MSDF is useful for CCFS*
CMM 2017-04 05 Encourage additional marine pollution measures and reporting gear loss PNA suggest omitting para 05 because of its non-binding language	n/a	compliance issues would depend on national requirements	**Current MSDF** - Observer Trip Monitoring Summary Issue Code (PN-C, D, E) lose any fishing gear; (Yes No) , abandon any gear; (Yes No), fail to report any abandoned gear; (Yes No) **Current CCFS POL** cases are created based on Observer Trip Monitoring Summary	**Secretariat comment:** *Maybe potentially useful to collect information about how crew may attempt to retrieve abandoned, lost or discarded fishing gear (ALDFG) and retain the material on board, separate from other waste for discharge to port reception facilities.*

Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	*ALTERNATIVE OR SUPPLEMENTARY COMMENTS*
			data	***PNA** comment: About the Secretariat comment to be useful for Observers to collect information about how crew may attempt to retrieve ALDFG is best left for CCMs reporting and not useful for CCFS purposes.*
FAD CLOSURE - TROPICAL PURSE SEINE				
CMM 2023-01 13 Setting on FADs in EEZ waters or high seas of Convention Area during the 1 1/2 month FAD Closure (previous CMMs had 3 Month FAD closure) PNA supports maintaining	types of FAD sets - free school, logs or associated	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	**Current MSDF** - Type of school association (row 143), Latitude and longitude of activity (row 136) **Current CCFS FAI** cases are created by Secretariat based on current MSDF fields referred to above, and taking into consideration CCMs notified information to the Secretariat	**Secretariat comment:** *No change - some closer review by the Secretariat of the ROP data and specific circumstances would still be necessary, because there is information that CCMs notify the Secretariat, which is reported annually in reports. This information shouldn't need to be made available to Observers before they depart on their trip or during debriefing. For example, the CMM 2023-01 13 footnote 1 notifications*

Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	*ALTERNATIVE OR SUPPLEMENTARY COMMENTS*
				***PNA** comment: Suggest that it be made available publicly on the website and circulate widely to Observer providers so observer can be advised during placement*
CMM 2023-01 14 Setting on FADs in high seas of Convention Area during the one additional month FAD Closure period that the Flag State has chosen (**previous CMMs had two month choice)** PNA supports maintaining	types of FAD sets - free school, logs or associated, and location of set is high seas of Convention Area	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	**Current MSDF -** Type of school association (row 143), Latitude and longitude of activity (row 136) **Current CCFS FAI** cases are created by Secretariat based on current MSDF fields referred to above, and taking into consideration CCMs notified information to the Secretariat	**Secretariat comment:** *No change - some closer review by the Secretariat of the ROP data and specific circumstances would still be necessary, because there is information CCMs notify the Secretariat, which is reported annually in reports. This information shouldn't need to be made available to Observers before they depart on their trip or during debriefing. For example the selection of IATTC/WCPFC overlap choice, CNM participatory rights annual decision*
SEABIRDS				
CMM 2018-03 01, 02, 06 Required		Were mitigation measures	**Current MSDF** - tori line	**Secretariat comment:**

Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	*ALTERNATIVE OR SUPPLEMENTARY COMMENTS*
longline mitigation measures to reduce incidental catch of seabirds applying north of 23N or south of 25S. i. use at least two mitigation measures in paragraph 1(a) or hook shielding devices when fishing south of 30°S ii. use one of the mitigation measures in paragraph 2 when fishing in area 25°S-30°S iii. 24m or more in overall length, to use at least two mitigation measures in paragraph 6, Table 1 CMM 2018-03, including at least one from Column A when fishing north of 23°N iv. less than 24m in overall length, to use at least one of the mitigation measures from Column A in Table 1,when fishing north of 23°N PNA supports maintaining para 01 and 02 but have a question mark around paragraph 06 on whether it is practical for observers to collect the information require		used What mitigation measures were used Did mitigation measures meet the gear specification requirements *(Observer may not know what combination of mitigation measures that the vessel is required to use by the flag CCM so would document observations of the mitigation measure use and whether they meet the requirements)*	(row 62), deep setting line shooter (row 73), blue dyed baid (row 71), management of offal (row 74), strategic offal disposal (row 75) **NZ suggested additional MSDFs** - hook shielding devices (row 61), tori line condition (row 63), length of tori line (row 64), streamers on tori lines (row 65), tori line aerial extent (row 66), weighted branch lines (set level) (row 69), time of nautical dawn - for night setting (row 77), night setting (row 78)	*Could be a yes no question on Observer Trip Monitoring Summary on whether mitigation measures were used* *Would be useful to also collect some data to inform whether any attempts were made to use mitigation devices.* *Some closer review by the Secretariat of the ROP data fields and specific circumstances might still be necessary, because there is information CCMs notify the Secretariat, which is reported annually in reports. This information shouldn't need to be made available to Observers before they depart on their trip or during debriefing.*
	Were there interactions with seabird and if so what seabirds, nature of interaction and fate of		**Interactions** **Current MSDF** - type of interaction (row 154), data and time of interaction	

Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	*ALTERNATIVE OR SUPPLEMENTARY COMMENTS*
	seabird		(row 155), latitude and longtitude of interaction (row 156), species code of marine reptile, marine mammal, or seabird (row 158), vessels activity during interaction (row 169), condition observed at start of interaction (row 170), condition observed at end of interaction (row 171), description of interaction (row 174), number of animals sighted (row 175) **New proposed MSDF** data fields - Time of SSI first sighting with time recorded before or after Set time (row 157), SSI is incidentally encircled in the purse seine net (row 172), if SSI is caught by longline, what is the length of line on released live animal (longline caught) (row 173)	
SEA TURTLES				
CMM 2018-04 04 CCMs to ensure	Were there	Were mitigation measures	**Interactions**	**Secretariat comment:**

Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	*ALTERNATIVE OR SUPPLEMENTARY COMMENTS*
fishermen use proper mitigation and handling techniques and foster the recovery of any turtles that are incidentally captured - fishers on its flagged vessels to bring aboard, if practicable, any captured hard-shell sea turtle that is comatose or inactive as soon as possible and foster its recovery, including giving it resuscitation, before returning it to the water, use proper mitigation and handling techniques as described in WCPFC guidelines PNA supports maintaining para 04	interactions with sea turtles and if so what sea turtles, nature of interaction and fate of sea turtle	used What mitigation measures were used Did mitigation measures meet the gear specification requirements	**Current MSDF -** species code (row 127) and Fate Code (row 127) indicating retained, condition when caught (row 105), fate (row 106), condition when released (row 107), type of interaction (row 154), data and time of interaction (row 155), latitude and longitude of interaction (row 156), species code of marine reptile, marine mammal, or seabird (row 158), vessels activity during interaction (row 169), condition observed at start of interaction (row 170), condition observed at end of interaction (row 171), description of interaction (row 174), number of animals sighted (row 175) **New proposed MSDF** data fields - Time of SSI first sighting with time recorded before or after Set time (row 157), SSI is incidentally	*Could be a new yes no question on Observer Trip Monitoring Summary as to whether the vessel had any interactions with sea turtles that are documented. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific mitigation measure use, and safe handling practices* ***PNA comment:*** *PS-3 already capture SSI sighting and encirclement data for purse seine and support that additional Yes/No question on the GEN3 maybe taken up during debriefing to minimize at-sea workload*

Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	*ALTERNATIVE OR SUPPLEMENTARY COMMENTS*
			encircled in the purse seine net (row 172), if SSI is caught by longline, what is the length of line on released live animal (longline caught) (row 173)	
CMM 2018-04 06 CCMs to require longline vessels to carry and use line cutters and de-hookers to handle and promptly release sea turtles, as well as dip-nets where appropriate PNA supports maintaining		Were mitigation measures used What mitigation measures were used Did mitigation measures meet the gear specification requirements		**Secretariat comment:** *Could be a new yes no question on Observer Trip Monitoring Summary as to whether the vessel carries and uses line cutters and de-hookers for sea turtles, as well as dip-nets. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to use of these mitigation measures during specific incidents*
CMM 2018-04 07 (a, b) Sea Turtle mitigation requirements for shallow-set longline vessels - LL vessels to employ at least one of the three mitigation methods listed in paragraph 7a of the CMM - i. Use only large circle hooks, which are fishing hooks that are generally circular or		Were mitigation measures used What mitigation measures were used Did mitigation measures meet the gear specification requirements	**Current MSDF -** hook type (row 59), hook size (row 60), bait species (row 92), targt species (row 91)	**Secretariat comment:** *Could be a new yes no question on Observer Trip Monitoring Summary if vessel is fishing in shallow-set manner, whether mitigation measures were used. The MSDFs data*

Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	*ALTERNATIVE OR SUPPLEMENTARY COMMENTS*
oval in shape and originally designed and manufactured so that the point is turned perpendicularly back to the shank. These hooks shall have an offset not to exceed 10 degrees. ii. Use only finfish for bait. or iii. other Commission approved mitigation measure/plan PNA supports maintaining				*fields should be reviewed to check that they will sufficiently document observations related to specific mitigation measure use.* *Some closer review by the Secretariat of the ROP data fields and specific circumstances might still be necessary, because there is information CCMs notify the Secretariat, which is reported annually in reports. This information shouldn't need to be made available to Observers before they depart on their trip or during debriefing.*
MOBULID RAYS				
CMM 2019-05 (04-06, 08, 10) Prohibit retaining/transhipping/storing/landing mobulid rays PNA supports maintaining paragraph 03-05, para 06 is suggested to be omitted because it is not monitored by observers and paragraph 10 can be considered as obstruction under ROP CMM		Were mobuilds landed on board and retained, were mobulids transhipped	*Check that there are some observed fate codes that indicate retention in whole or in part for SSI*	**Secretariat comment:** *Could be a new yes no question on Observer Trip Monitoring Summary related to whether retention or transhipping was observed. The MSDFs data fields should be*

Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	*ALTERNATIVE OR SUPPLEMENTARY COMMENTS*
				reviewed to check that they will sufficiently document observations related to specific incidents, including fate of SSIs ***PNA comment:*** *PS-3 already capture SSI sighting and encirclement data for purse seine and support that additional Yes/No question on the GEN3 maybe taken up during debriefing to minimize at-sea workload*
CMM 2019-05 03 Prohibit targeted fishing or intentional setting on mobulid rays	Were there interactions with mobulids - seen from the vessel and if so what mobulids, nature of interaction and fate of mobulids	Was purse seine gear deployed or continue to be deployed while one or more mobulids were in the vicinity of the gear being released	**Interactions** **Current MSDF** - species code (row 127) and Fate Code (row 127) indicating retained, condition when caught (row 105), fate (row 106), condition when released (row 107), type of interaction (row 154), data and time of interaction (row 155), latitude and longtitude of interaction (row 156), species code of marine reptile, marine	**Secretariat comment:** *Could be a new yes no question on Observer Trip Monitoring Summary related to whether intentional setting was observed. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific incidents* ***PNA comment:*** *PS-3*

Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	*ALTERNATIVE OR SUPPLEMENTARY COMMENTS*
			mammal, or seabird (row 158), vessels activity during interaction (row 169), condition observed at start of interaction (row 170), condition observed at end of interaction (row 171), description of interaction (row 174), number of animals sighted (row 175) **New proposed MSDF** data fields - Time of SSI first sighting with time recorded before or after Set time (row 157), SSI is incidentally encircled in the purse seine net (row 172)	*already capture SSI sighting and encirclement data for purse seine and support that additional Yes/No question on the GEN3 maybe taken up during debriefing to minimize at-sea workload*
SHARKS				
CMM 2024-05 07-09 Take measures to ensure full utilization of sharks and prohibition of finning PNA agree to maintain paragraph 07 as it is monitored by observers and suggest omitting paragraph 8-9 as it is a CCM level obligation.	were there catches of sharks, and what species, what catches were released/retained, what was their condition if released	Did vessel follow requirements to store carcasses and corresponding fins correctly, so that inspectors and observers can verify	**Current MSDF** - species code (row 127) and Fate Code (row 127) indicating retained and fining activity, condition when caught (row 105), fate (row 106),indicating retained and fining activity, estimated shark fin weight by species (row 162),	**Secretariat comment:** *Could be a new yes no question on Observer Trip Monitoring Summary related to whether vessel had in place measures to ensure individual shark carcases and their corresponding fins can be easily identified onboard*

Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	*ALTERNATIVE OR SUPPLEMENTARY COMMENTS*
			estimated carcass weight by species (row 163) **New proposed MSDF** - method used to store shark fins (row 164) **Current CCFS SHK** potential shark finning cases are created by Secretariat based on current MSDF fields referred to above	*the vessel at any time. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific incidents*
CMM 2024-05 14 Prevent fishing vessels from retaining on board (including for crew consumption), transshipping and landing any fins harvested in contravention PNA suggest that this paragraph is not feasible for observer to report on or collect those data and suggest omitting				**Secretariat comment:** *Could be a new yes no question on Observer Trip Monitoring Summary related to whether crew consumed any shark fins. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific incidents,*
CMM 2024-05 15 Ensure carcasses and corresponding fins are landed or transshipped together PNA suggest that this paragraph is not		Did vessel follow requirements to during transhipment and landing to ensure carcasses and corresponding fins were		**Secretariat comment:** *Could be a new yes no question on Observer Trip Monitoring Summary related to whether vessel*

Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	*ALTERNATIVE OR SUPPLEMENTARY COMMENTS*
feasible for observer to report on or collect those data and suggest omitting		together		*transhipped or landed any sharks. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific incidents, including whether the carcasses and corresponding fins were landed or transhipped together*
CMM 2024-05 18 Minimize bycatch of sharks in longline fisheries between 20N and 20S i. prohibits its flagged longline vessels, between 20N and 20S, targeting tuna and billfish from using wire trace as branch lines or leaders, ii. requires its flagged longline vessels, between 20N and 20S, targeting tuna and billfish, if carrying wire trace as branch lines or leaders, to stow them, iii. prohibits its flagged longline vessels, between 20N and 20S, targeting tuna and billfish from using shark lines or branch lines running directly off of the longline floats or drop lines PNA supports maintaining		Were mitigation measures used What mitigation measures were used Did mitigation measures meet the gear specification requirements	**Current MSDF** - target species (row 91), shark lines (row 70), wire trace (row 53)	**Secretariat comment:** *Could be a new yes no question on Observer Trip Monitoring Summary if vessel is fishing for tuna and billfish, whether shark mitigation measures were used. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific mitigation measure use* *Some closer review by the Secretariat of the ROP data fields and specific*

Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	*ALTERNATIVE OR SUPPLEMENTARY COMMENTS*
				circumstances might still be necessary, because there is information CCMs notify the Secretariat, which is reported annually in reports. This information shouldn't need to be made available to Observers before they depart on their trip or during debriefing.
CMM 2024-05 21 Haul non-retained sharks alongside for species identification when possible PNA supports maintaining				**Secretariat comment:** *Could be a new yes no question on Observer Trip Monitoring Summary related to whether vessel did not haul any sharks that are caught alongside the vessel before being cut free to facilitate species ID. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific incidents, including fate of SSIs*
CMM 2024-05 24 (01-03) Specific requirements to protect oceanic	Were there interactions with	Were OCS or FAL landed on	**Current MSDF** - species code (row 127) and Fate	**Secretariat comment:** *Could be a new yes no*

Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	*ALTERNATIVE OR SUPPLEMENTARY COMMENTS*
whitetip and silky sharks PNA supports maintaining sub-paragraph 1-2 and omitting sub-para 03	oceanic whitetip sharks and silky sharks - if so what shark species, nature of interaction and fate of sharks	board and retained, were OCS or FAL transhipped	Code (row 127) indicating retained, condition when caught (row 105), fate (row 106), condition when released (row 107) **Current CCFS SHK** cases related to potential retention of OCS and FAL are created by Secretariat based on current MSDF fields referred to above	*question on Observer Trip Monitoring Summary related to whether vessel caught any OCS or FAL, and whether the vessel retained any OCS or FAL. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific incidents, including fate of SSIs*
WHALE SHARKS				
CMM 2024-05 25 (01-07) Prohibit purse seine setting on whale sharks and retention/transshipment PNA supports maintaining sub-paragraph 1-2 and 5a and suggest omitting sub-paragraph 3, 4, 6, and 7 as it is not practical for observers to collect	Report on interactions with whale sharks that were seen from the vessels -	Was purse seine gear deployed or continue to be deployed while one or more whale sharks were in the vicinity of the gear being released Were whale sharks landed on board and retained	**Interactions** **Current MSDF** - species code (row 127) and Fate Code (row 127) indicating retained, condition when caught (row 105), fate (row 106), condition when released (row 107), type of interaction (row 154), data and time of interaction (row 155), latitude and longtitude of interaction (row 156), species code of marine reptile, marine mammal, or seabird (row	**Secretariat comment:** *Could be a new yes no question on Observer Trip Monitoring Summary related to whether intentional setting on whale sharks was observed. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific incidents, including fate of SSIs*

Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	*ALTERNATIVE OR SUPPLEMENTARY COMMENTS*
			158), vessels activity during interaction (row 169), condition observed at start of interaction (row 170), condition observed at end of interaction (row 171), description of interaction (row 174), number of animals sighted (row 175) **New proposed MSDF data fields** - Time of SSI first sighting with time recorded before or after Set time (row 157), SSI is incidentally encircled in the purse seine net (row 172), if SSI is caught by longline, what is the length of line on released live animal (longline caught) (row 173) *Check that there are some observed fate codes indicates retention in whole or in part for SSI* **Current CCFS CWS**	***PNA comment:*** *PS-3 already capture SSI sighting and encirclement data for purse seine and support that additional Yes/No question on the GEN3 maybe taken up during debriefing to minimize at-sea workload*

Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	*ALTERNATIVE OR SUPPLEMENTARY COMMENTS*
			interactions with purse seine and whale sharks are created by Secretariat based on current MSDF fields referred to above	
CETACEANS				
CMM 2024-07 01 Prohibit purse seine setting on cetaceans, if animal is sighted prior to commencement of the set PNA support maintaining	Report on interactions with cetaceans that were seen from the vessels -	Was purse seine gear deployed or continue to be deployed while one or more cetaceans were in the vicinity of the gear being released Were cetaceans landed on board and retained	**Interactions** Current MSDF - species code (row 127) and Fate Code (row 127) indicating retained, condition when caught (row 105), fate (row 106), condition when released (row 107), type of interaction (row 154), data and time of interaction (row 155), latitude and longtitude of interaction (row 156), species code of marine reptile, marine mammal, or seabird (row 158), vessels activity during interaction (row 169), condition observed at start of interaction (row 170), condition observed at end of interaction (row 171), description of interaction (row 174), number of	**Secretariat comment:** Could be a new yes no question on Observer Trip Monitoring Summary related to whether intentional setting on cetaceans was observed. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific incidents ***PNA comment:*** *PS-3 already capture SSI sighting and encirclement data for purse seine and support that additional Yes/No question on the GEN3 maybe taken up during debriefing to minimize at-sea workload*

Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	*ALTERNATIVE OR SUPPLEMENTARY COMMENTS*
			animals sighted (row 175) **New proposed MSDF data fields** - Time of SSI first sighting with time recorded before or after Set time (row 157), SSI is incidentally encircled in the purse seine net (row 172), if SSI is caught by longline, what is the length of line on released live animal (longline caught) (row 173) *Check that there are some observed fate codes indicates retention in whole or in part for SSI* **Current CCFS CWS interactions** with purse seine and cetaceans are created by Secretariat based on current MSDF fields referred to above	
CMM 2024-07 02 Requirements in the event of unintentional encircling of cetaceans in the purse seine net, including incident reporting	Report on interactions with cetaceans that were seen from the vessels -	Were efforts made to release cetaceans that were encircled in the purse seine net, and where	*Check that there are some observed fate codes indicates retention in whole or in part for SSI*	**Secretariat comment:** *Could be a new yes no question on Observer Trip Monitoring Summary as to*

Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	*ALTERNATIVE OR SUPPLEMENTARY COMMENTS*
requirements PNA supports maintaining		cetaceans landed on board released		*whether the vessel had any interactions with cetaceans that are documented. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to safe handling practices*
CMM 2024-07 03 CCMs shall prohibit all longline and purse seine vessels flying their flag from harvesting, retaining onboard, transshipping, or landing any cetacean, in whole or any part thereof, in the Convention Area PNA supports maintaining		Did fishing vessel catch a cetacean, and was it retained onboard, or transhipped Was the capture/fate correctly recorded	Interactions **Current MSDF** - species code (row 127) and Fate Code (row 127) indicating retained, condition when caught (row 105), fate (row 106), condition when released (row 107), type of interaction (row 154), data and time of interaction (row 155), latitude and longtitude of interaction (row 156), species code of marine reptile, marine mammal, or seabird (row 158), vessels activity during interaction (row 169), condition observed at start of interaction (row 170), condition observed at end	**Secretariat comment:** *Could be a yes no question on Observer Trip Monitoring Summary related to whether retention of cetaceans was observed. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific incidents involving retention and transhipping of cetaeceans* ***PNA comment:** PS-3 already capture SSI sighting and encirclement data for purse seine and support that additional Yes/No*

Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	*ALTERNATIVE OR SUPPLEMENTARY COMMENTS*
			of interaction (row 171), description of interaction (row 174), number of animals sighted (row 175) **New proposed MSDF data fields** - Time of SSI first sighting with time recorded before or after Set time (row 157), SSI is incidentally encircled in the purse seine net (row 172), if SSI is caught by longline, what is the length of line on released live animal (longline caught) (row 173) *Check that there are some observed fate codes to indicate retention in whole or in part for SSI*	*question on the GEN3 maybe taken up during debriefing to minimize at-sea workload*
CMM 2024-07 04 CCMs shall require all longline vessels flying their flag, including those fishing under charter arrangements, to release, taking into account the safety of the crew, any	Report on interactions with cetaceans that were seen from the vessels	Were efforts made to release cetaceans that were entangled by fishing gear, and where cetaceans landed on board released	**Interactions** **Current MSDF** - species code (row 127) and Fate Code (row 127) indicating retained, condition when	**Secretariat comment:** *Could be a new yes no question on Observer Trip Monitoring Summary as to whether the vessel had any*

Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	*ALTERNATIVE OR SUPPLEMENTARY COMMENTS*
cetacean that is caught or entangled by its fishing gear in the Convention Area as soon as possible and in a manner that results in as little harm to the cetacean as possible and utilizing the Best Practices for the Safe Handling and Release of Cetaceans (suppl_CMM 2011-03-01), if possible PNA supports maintaining			caught (row 105), fate (row 106), condition when released (row 107), type of interaction (row 154), data and time of interaction (row 155), latitude and longtitude of interaction (row 156), species code of marine reptile, marine mammal, or seabird (row 158), vessels activity during interaction (row 169), condition observed at start of interaction (row 170), condition observed at end of interaction (row 171), description of interaction (row 174), number of animals sighted (row 175) **New proposed MSDF data fields** - Time of SSI first sighting with time recorded before or after Set time (row 157), SSI is incidentally encircled in the purse seine net (row 172), if SSI is caught by longline, what is the length of line on	*interactions with cetaceans that are documented. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to safe handling practices* ***PNA comment:*** *PS-3 already capture SSI sighting and encirclement data for purse seine and support that additional Yes/No question on the GEN3 maybe taken up during debriefing to minimize at-sea workload*

Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	*ALTERNATIVE OR SUPPLEMENTARY COMMENTS*
			released live animal (longline caught) (row 173) *Check that there are some observed fate codes indicates retention in whole or in part for SSI*	