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Proposed ROP Data Fields for Non-Catch Transfers

WCPFC22-2025-IP04c

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Submitted by the ROP-IWG Chair

Purpose

1. This paper reports on progress on WCPFC21 taskings to the ROP-IWG relating to non-fish transfers and proposes updates to the ROP [Minimum Data Fields for Observer Transshipment Monitoring](#) to include new data fields for monitoring and reporting “non-catch” transfers (e.g. provisions, fuel, bait, personnel).
2. It also provides updated information on the key points from the discussions on this topic at ROP-IWG6 and the ROP-IWG7 (held adjacent to TCC22), as well as the subsequent proposal by Japan during TCC22.
3. It should be noted that decisions on whether non-catch transfers are to be required from CCMs and/or supported by monitoring through the ROP are to be considered separately by TCC22 and the Commission, rather than the ROP-IWG.

Background

4. At WCPFC21 in December 2024, the Commission had tasked the ROP-IWG with discussing the addition of non-fish transfers to the [observer minimum data fields for monitoring transshipment](#) (WCPFC21 [Summary Report](#), paragraph 511). This follows discussions during the review of the Transshipment CMM ([CMM 2009-06](#)), which highlight the challenges in identifying and understanding these transfers. The review also identifies the need for enhanced reporting which is critical for validating and verifying activities within the Convention Area.
5. This tasking follows the submission of a proposal to the Transshipment IWG to amend Annexes I and III of the Transshipment CMM ([CMM 2009-06](#)). These Annexes list the required information for WCPFC Transshipment Declaration and Notices (Notifications) to the Executive Director. The proposed amendments at that time were:
 - In Annex 1 (Declaration) - “7. Did non-fish transfer occur? (yes or no”) If yes, provide details of this non-fish transfer, including the exchange of crew (numbers) and provision of supplies between vessels. “

- In Annex 3 (Notification) – “7. Will non-fish transfers occur? (“Yes” or “No”). If yes, provide details of this proposed non-fish transfer, including the exchange of crew (numbers) and provision of supplies between vessels.”
 - To include a footnote to define ‘non-fish transfer’ based on the North Pacific Fisheries Commission (NPFC) CMM definition – ““means a transfer of fuel, gear, materials, or other supplies, or a transfer of at least one person, from one fishing vessel to another fishing vessel in the Convention Area”
6. The proposal aims to improve monitoring of interactions at sea where no fish were transferred but other activities occurred - such as the exchange of crew or supplies. Capturing this data helps verify such encounters and reduces potential compliance queries, particularly as the Secretariat continues to develop tools to detect vessel proximity.
 7. Although the Commission has not yet fully considered changes to CMM 2009-06, assigning this task to the ROP-IWG is considered to be a step toward identifying necessary data and assessing how additional reporting might impact observer programmes.

Updated information

8. The following key points on the proposed approach to address current issues with the MSDFs and their use in CCFS are noted from ROP-IWG discussions during 2025.
 - There was strong caution expressed about the potential reporting burden that could arise from requiring detailed observer reporting of non-catch transfers. Reference was made to the experience of the NPFC, where flag CCMs and the Secretariat reportedly had to manage over 5,000 such records annually.
 - Some participants suggested that observer reporting should be limited to noting that a non-catch transfer event occurred, including identification of the two vessels involved, without recording further details about the type of supplies or personnel exchanged.
 - Clarification was sought and received from the Secretariat that the current discussion focused specifically on observer MSDFs. It was confirmed that under the minimalist approach adopted by NPFC, it would be sufficient for observers to identify that a non-catch transfer occurred, and which vessels were involved, without providing detailed inventory of items exchanged.
 - It was recommended that observers simply mark the occurrence of non-fish transfers during their deployments to distinguish such events from regular fish transshipments, thereby supporting compliance oversight without overburdening data collection.
 - However, other CCMs expressed the view that, in light of increasing trafficking and other illicit activities in Pacific fisheries, observers should be required to record all transfers taking place - similar to current requirements during purse seine and longline observer trips. This would contribute to broader monitoring and enforcement objectives in the region.
9. The Chair of the ROP-IWG invited participants to provide written feedback and during ROP-IWG6, a CCM expressed that observer reporting should be limited to noting a non-fish transfer event occurred

and identifying the vessels involved, without further details. Other comments considered additional details would be needed.

10. Discussion during ROP-IWG7 continued in the margins of TCC22 and resulted in proposed data fields for inclusion in the [Minimum Data Fields for Observer Transshipment Monitoring](#). (Refer to Annex A)

Next steps

11. This proposal is to be considered further during the 2026 intersessional process with the aim of adoption at WCPFC23.

List of data to be collected by the ROP observer (Non-catch transfer)

1. Carrier (supply donor) vessel
 - i. Vessel's name
 - ii. IMO number
 - iii. Current flag
2. Non-catch transfer
 - i. Date
 - ii. Latitude
 - iii. Longitude
 - iv. Goods supplied
 - Fuel (Yes/No)
 - Bait (Yes/No)
 - FADs or FAD materials (Yes/No)
 - Passengers/Crew (Yes/No)
 - Other (specify)
3. Remarks (if needed)