



**TECHNICAL AND COMPLIANCE COMMITTEE
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Current Data Flows for Case Creation in CCFS

WCPFC-TCC22-2026-IP04

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Submitted by the Secretariat and the SSP¹

Purpose

1. This paper responds to a Commission tasking to the Secretariat and the Scientific Services Provider (SSP) to provide information on the existing data flows between the SSP, the Secretariat, and CCMs. These data flows support the creation of new Compliance Case File System (CCFS) cases arising from observer data, and the subsequent addition of information to those cases.

Background

2. The CCFS is an online tool developed by the Secretariat and launched in April 2016. Its original purpose was to provide the Secretariat with a structured and centralised mechanism for recording correspondence relating to individual alleged infringements of Conservation and Management Measures (CMMs) and to support the Secretariat's delivery of tasks under the CMM for the Compliance Monitoring Scheme ([CMM 2023-04](#)).
3. In 2019, the Commission amended the purpose of the CCFS to direct the Secretariat to maintain the CCFS "as a secure, searchable system to store, manage and make available information to assist CCMs with tracking alleged violations by their flagged vessels." ([CMM 2019-06](#))
4. In 2020, the Secretariat commissioned a [review of the CCFS](#). In 2021, the Secretariat began implementing improvements, with the upgraded CCFS released in March 2022. The upgraded system incorporated several enhancements requested by CCMs, including a messaging function to track requests for observer reports and simplify access to observer reports.
5. During 2025 and 2026, the ROP IWG has been developing a new process through which relevant ROP observer information to support case creation would be provided directly to the Secretariat by the responsible ROP CCM. The proposed process would remove the need for the SSP to transfer CCFS-related observer information for case creation. To support the ongoing work of the ROP IWG on this

¹ Pacific Community – Oceanic Fisheries Programme (SPC-OFP).

proposed process, in 2025, the Commission tasked the Secretariat and SSP to provide information on the current CCFS data flow.² This paper describes the flow of relevant observer data from the SSP to the Commission's database and subsequently to the CCFS. It also outlines the processes used by the Secretariat and CCMs to manage case files after they have been created.

Provision of relevant observer data to the Commission

6. The SSP receives ROP observer reports submitted through its electronic reporting tool (OLLO) which was developed a few years ago. TUFMAN2 includes a debriefing module that supports the review of data received through OLLO. However, most ROP observer reports are manually entered into TUFMAN2 after undergoing debriefing at the national level by the relevant observer provider, particularly for Pacific Island countries and territories. Some ROP observer programmes enter their data directly into TUFMAN2, while others provide reports to the SSP for data entry by SSP staff, with additional support provided, where necessary, by WCPFC data-entry technicians. Although some purse-seine observer reports are collected electronically through PNAO's FIMS application, they are provided to the SSP in PDF format and must therefore be entered manually into TUFMAN2.
7. Potential cases are identified from the Observer Trip Monitoring Summary Report (GEN-3) where the observer has selected the notification field indicating that a possible violation occurred. The relevant data are transferred to the Commission through an export file downloaded from a link provided by the SSP. This export is referred to as a "TUBS load".
8. The large volume of observer reports requiring manual data entry, together with limited data-entry resources, has typically resulted in a growing backlog. Long-standing challenges with integration between TUFMAN2 and FIMS have also affected the timely submission and availability of purse-seine observer data. These pressures have increased over the past year because of additional data entry requirements, including debriefing forms and scoresheets, pole-and-line vessels, US Treaty observer trips (managed by FFA until 2023), and observer transshipment reports. These factors affect how quickly observer data can be made available for transfer to the Commission and may continue to delay the creation and notification of potential cases through the CCFS.

Processing observer data for CCFS case creation

9. An export file is provided by the SSP and loaded into the Secretariat's SQL database. An external contractor assists with data processing by linking the SSP source data with the Secretariat internal data and running a number of pre-defined queries. Each query systematically filters the newly loaded data using certain criteria to determine new cases for each CCFS case type. The datasets resulting from these queries are then each loaded into the CCFS system as new cases with a status set to DRAFT.
10. Each DRAFT case is then subject to additional automated and manual checks by the Secretariat. These checks identify cases that should not be notified based on other information available to the Secretariat, including information provided by flag CCMs through the Record of Fishing Vessels or other required reporting. For example, information that a vessel was exempt from an applicable FAD

² WCPFC22 Summary Report, paragraph 269 – adopted with recommendations from TCC21 in [WCPFC22-2025-09_Rev01](#).

closure may confirm that the relevant obligation was not breached. Cases that should not be notified are assigned the status NOT FOR FLAG CIRCULATION. **Annex 1** summarises the pre-processing and case-specific checks applied.

11. These checks require significant resources, as a single transfer may include hundreds of cases, or more than 1,000 cases, depending on how many transfers are made in any one year.

Compliance case file management

12. The status of the remaining cases is changed to NEW CASE. When the status changes, automated messages are sent to the authorised CCFs contacts for each CCM that is a party to the case, advising that the case is available for review and reporting progress on the investigation. The flag CCM and the ROP provider are always parties to a ROP-initiated case. Other CCMs are included where relevant, including the coastal CCM in whose waters the event occurred and the chartering CCM where the vessel was operating under charter at the time of the potential violation. **Annex 2** shows the data fields transferred and used to create an individual case file.
13. Once a case has been created and notified, all parties to the case may add information and respond to queries until the case is closed. Responsibility for providing the information required to support changes in case status rests with the flag CCM (CMM 2023-04, paragraph 11).
14. Whenever a CCM adds information to a case file, an automated message is sent to all parties to the case to notify of an update, and the case appears in the Secretariat's list of cases requiring administrative review. The Secretariat reviews the information provided and, where appropriate, updates the status of the case. **Figure 1** shows the progression of case-file statuses from DRAFT case through to closure.

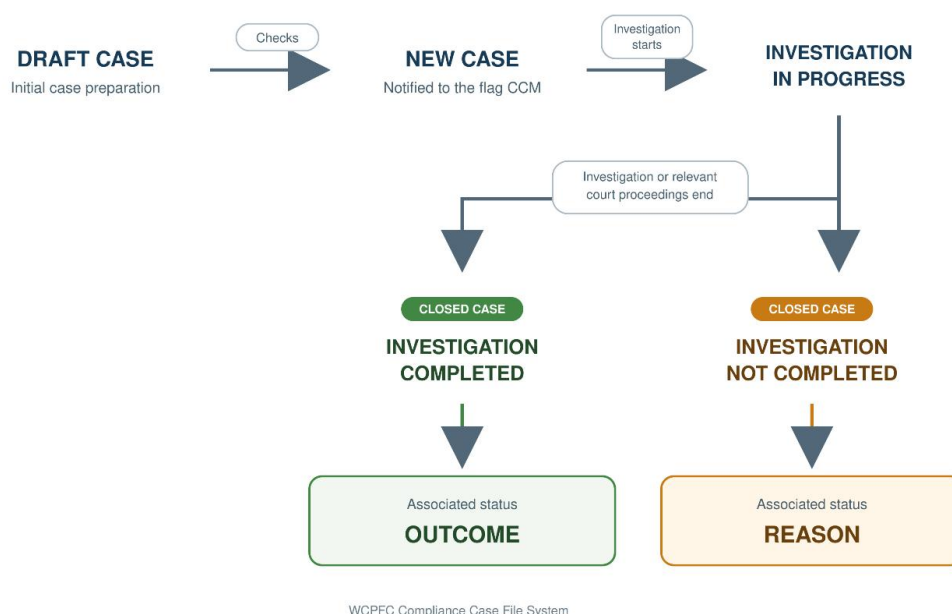


Figure 1: Progression of case-file statuses in the WCPFC Compliance Case File System

15. Once the flag CCM indicates that it has initiated an investigation, either directly or following a request to the ROP provider for relevant information from the observer report, the Secretariat will change the case status from NEW CASE to INVESTIGATION IN PROGRESS.
16. Once the flag CCM has received the observer report, completed its investigation, and provided brief information on the outcome and the reasons for that outcome, the Secretariat reviews the information and may close the case as INVESTIGATION COMPLETED. Where the investigation cannot be completed and the flag CCM provides the reason, the Secretariat may close the case as INVESTIGATION NOT COMPLETED. The flag CCM may also select the “CCM Completed” field when it considers that it has provided all relevant information.
17. When reviewing the information provided at each stage, the Secretariat assesses whether the flag CCM’s response addresses the requirements of paragraph 11 of CMM 2023-04.

Key checks applied to draft CCFS cases generated from ROP data provided through the SSP

Pre-processing checks

Pre-processing primarily involves automated queries applied to the TUBS load to confirm that:

1. the number of trips matches the number transferred;
2. the number of GEN-3 notifications matches the number transferred;
3. the number and status of the records match the GEN-3 information provided by the SSP; and
4. the data do not contain duplicate records.

Processing checks

Once pre-processing has been completed, the following automated and, where necessary, manual checks are applied:

Observer trip data are matched to the relevant vessel record on the Record of Fishing Vessels. This may involve an active vessel, a deleted vessel or a vessel that changed its name before the TUBS load was received. Manual checks may be required where, for example, the vessel name recorded in the observer data does not match the format used in the RFV.

1. Cases are matched to existing trips to ensure that they are linked to any existing series of cases arising from the same trip.
2. Additional CCMs with a specific interest in the case are added as parties where relevant eg the chartering CCM or coastal CCM.

Case-specific checks

Beyond the standard processing checks, no additional checks are needed for observer obstruction cases (OAI), pre-notification cases (PAI) and pollution cases (POL).

The following checks apply to other types:

- a. Cetaceans and whale sharks (CWS) and sharks (SHK) cases: Limited checks may be needed to ensure there are no cases for locations outside the Convention Area or in Archipelagic waters.
- b. FAD-related cases (FAI): Each case must be reviewed individually to check the type of case and applicable year to assess whether the case should be notified:
 - i. FAD closure:
 - For cases arising within an EEZ, the case must be checked against any exemption notified by the relevant CCM under the applicable measure. Where the vessel was notified as exempt from the closure in that EEZ, the case is assigned the status NOT FOR FLAG CIRCULATION. Where no applicable exemption was notified, the case is circulated.

- Cases relating to events outside the Convention Area or within archipelagic waters are assigned the status NOT FOR FLAG CIRCULATION.
- Cases arising on the high seas in the Convention Area are generally circulated. An exception may apply in the WCPFC–IATTC overlap area where the flag CCM is entitled to apply IATTC measures preferentially and has notified its preference to apply those measures.

ii. Additional high seas FAD closure

- Automated checks take account of the additional closure month or months selected and notified by each flag CCM. Cases arising during the period selected by the relevant CCM are circulated.
- For Kiribati, cases must be checked against the applicable arrangements concerning the use of FADs on the high seas adjacent to its EEZs. Where the relevant arrangement applies, the case is assigned the status NOT FOR FLAG CIRCULATION
- For Philippines vessels operating under the HSP1 arrangement, cases must be checked against the FAD-closure requirements applicable to HSP1 in the relevant event year.

CCFS case file showing the header data fields received from SSP and used to create an individual case file

Type:	Shark Catch Alleged Infringements		Parties Involved:	
Set Datetime:	01 Jun 2023 - 16:35 (UTC)		Responsible CCM:	
Obligation:	CMM 2019-04 20 (01-03)		Observer Provider:	
Species:	SILKY SHARK		Location:	
Fate:	RETAINED or FINS REMOVED AND TRUNK DISCARDED (RCC)		Location EEZ / IW:	IW
Individuals:	1		Location EEZ / IW:	4.861S, 166.649W

VESSEL TRIP

Vessel:

Trip Dates: 03 May 2023 - 15 Jun 2023

Observer Provider: FAOB

Provider Trip Number:

ROP Report Received: No

Requested Date: 06 Mar 2025

CCM Notified Date: 30 Jul 2024

New Zealand
Aotearoa

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