



**TECHNICAL AND COMPLIANCE COMMITTEE
TWENTY-SECOND REGULAR SESSION**

23 - 29 September 2026

Pohnpei, Federated States of Micronesia (Hybrid)

Progress on CCFS Cases Older Than 24 Months

WCPFC-TCC22-2026-18

24 August 2026

Submitted by the Secretariat

Purpose

1. This paper reports on progress in closing cases in the Compliance Case File System (CCFS), focusing on cases that have remained open for more than 24 months and cases closed with the status "INVESTIGATION NOT COMPLETED". It also provides an update on information submitted by CCMs concerning national statutes of limitations.
2. Unless otherwise indicated, the data presented in this paper reflects the status of cases as at 2 April 2026, consistent with the data used to prepare the Aggregated Tables in WCPFC-TCC22-2026-dCMR02_SECURE. At the time this paper was prepared, the Secretariat had completed its review of all case updates submitted by CCMs.
3. Data for cases in CCFS from ROP reporting is incomplete for 2024, and no new cases of this type for 2025 and 2026 have been entered into CCFS. Further information is provided below. Data for cases arising from Article 25(2) requests for investigation reflect the status of those cases as at 14 August 2026.

Introduction

4. In 2023, [WCPFC20](#) adopted recommendations from [TCC19](#) that cases in the CCFS older than 24 months should be addressed systematically and should not be closed automatically. Where an investigation cannot be completed, CCMs should explain why the case needs to be closed, noting the requirement for flag CCMs to take action in response to alleged violations.
5. In 2024, TCC20 recognised that legal limitations or practical challenges may prevent a CCM from completing an investigation or taking further action in relation to a case older than 24 months. These circumstances may include the expiry of an applicable limitation period, a change in the vessel's flag, a change of master or crew, the vessel or responsible entity no longer operating, or relevant individuals having left the fishing industry.
6. The CCFS was subsequently enhanced to include the status "INVESTIGATION NOT COMPLETED" and a limited set of categories through which a flag CCM can indicate why it could not complete an investigation or take further action in relation to an alleged violation. The categories reflected reasons previously provided by CCMs for investigations that could not be completed. At WCPFC21, the

Commission agreed that flag CCMs should provide information justifying the closure of a case using this status, with that information to be verified by the Secretariat. The Commission also tasked the Secretariat to report to TCC21 on cases closed using the new status.¹ TCC21 subsequently tasked the Secretariat to continue reviewing use of the status and to report to TCC22 on progress in closing cases older than 24 months.

7. TCC21 also requested CCMs, including CNMs, that had not already done so to provide the Secretariat with information on their statutes of limitations and the processes used to investigate CCFS cases.² No additional information on statutes of limitations has since been received; a summary of the information previously provided to the Secretariat is available in [WCPFC-TCC21-2025-08](#) *Matters Related to the Issues of CCFS Cases Older than 24 Months*.

Overview of all CCFS cases and their status

Data limitations

8. The CCFS is routinely updated by the Secretariat for Article 25(2) cases. For cases reported through high seas boardings and inspections, these may directly be entered by the Inspecting CCM. For cases derived from ROP data, periodic updates are made through a transfer of files according to procedures established by the Secretariat and the SPC-OFP, who oversee the management of WCPFC scientific data holdings.
9. Historically, the frequency of updates was constrained by the frequency with which SPC-OFP could provide ROP data, the availability of Secretariat IT resources to load the data, and the availability of Compliance staff to review the draft cases generated. This contributed to delays between the event year and the notification of observer-initiated cases. Until 2024, ROP-derived cases were generally updated every three to six months.
10. Since 2025, the work of the ROP IWG on streamlining the process for cases derived from ROP data to be provided to the Commission has the potential to support more frequent updates of CCFS based on ROP data (refer to [WCPFC-TCC22-2026-24a](#)). With this work underway, potential cases based on ROP data for the latter part of 2024 and for 2025 and 2026 have not been transferred to the Secretariat and entered into the CCFS. The Commission, at WCPFC22, indicated the handling of pending cases would be taken up at TCC22 in the context of broader CCFS decisions.³ The Secretariat therefore seeks guidance from TCC22, noting that some potential 2024 cases will now relate to events more than two years old.

Case files arising from ROP observer Trip Monitoring Summary Reports

1. Progress in closing cases can be seen at a high level by reviewing the status of all CCFS cases. To keep the focus on the overall outcome of reporting to TCC on case closures and their justification, only higher-level data has been presented. A more detailed breakdown on the scope and status of cases, particularly those originating from ROP observer data, is provided in [WCPFC-TCC22-2026-DCMR02_SECURE](#) *Static Aggregated Summary Information from the WCPFC Compliance Case File System (CCFS) of Flag CCM Responses to Alleged Infringements and Other Reports*.

¹ [WCPFC21 Summary Report](#), paragraphs 279 and 287

² [TCC21 Outcomes and Summary Report](#), paragraphs 112-114

³ [WCPFC22 Summary Report](#), paragraph 642

11. As at 14 August 2026, there were 13,537 cases in CCFS from 2012 – 2025 (increased from 13,122 reported to TCC in 2024) that are either:
- open** and require further action by the flag CCM - 8,384 (a reduction from 8,791 in 2024) - i.e. cases with a status of
 - NEW CASE - 2,790 (decreased from 3,081 in 2024), or
 - INVESTIGATION IN PROGRESS - 5,594 (decreased from 5,710 in 2024), or
 - closed** with no further action by the flag CCM - 5,153 (increased from 4,331 in 2024) - i.e. cases with a status of
 - INVESTIGATION COMPLETED with subcategories for each Infraction level - 3,760 (increased from 3,519 in 2024), or
 - INVESTIGATION NOT COMPLETED with sub-categories for the reason why the case could not be fully investigated through to its conclusion - 1,393 (increased from 812 in 2024).
12. **Figure 1** shows the above information with the year representing when the event occurred and the origin of the case generated either from data collected through the ROP or from Article 25(2) requests for investigation.

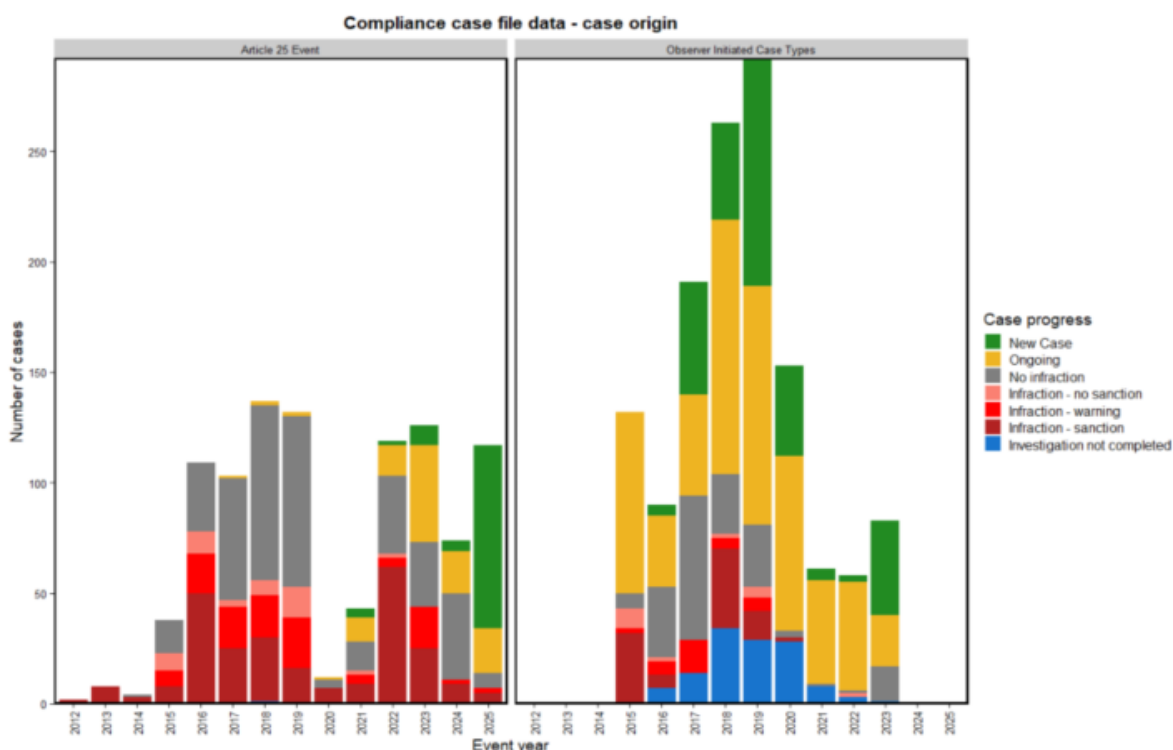


Figure 1. Total cases by year for Article 25(2) Events (left) and Cases based on ROP observer sourced data (right), showing the case progress and if completed the outcome of the investigation

13. **Figure 1** shows that Article 25(2) cases are more routinely investigated and closed. In contrast, there is a significant difference in the scale of cases sourced from ROP sourced data. Most remain open (green and yellow) with fewer closures, especially since 2020. This figure also shows the emerging use of the INVESTIGATION NOT COMPLETED (blue) status, introduced in 2024. As expected, this status is

more evident in cases for events over 24 months old. The Secretariat understands several CCMs are yet to consider the applicability of this new status for their old cases.

14. **Tables 1–3** provide case-status information by event year. **Table 1** covers Article 25(2) cases, while **Table 2** and **Table 3** cover the subsets of ROP based cases included in the Aggregated Tables in WCPFC-TCC22-2026-dCMR02_SECURE.

Table 1: The breakdown in case numbers by year, for the Article 25(2) cases and the case progress

Case progress	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
New Case	0	0	0	0	0	0	0	0	4	2	9	5	83
Ongoing	0	0	0	0	1	2	2	1	11	14	44	19	20
No infraction	0	1	15	31	55	79	77	4	13	35	29	39	7
Infraction - no sanction	0	0	8	10	3	7	14	0	2	2	0	0	0
Infraction - warning	0	0	7	18	19	19	23	0	4	4	19	2	2
Infraction - sanction	8	3	8	50	25	29	16	7	9	62	25	9	5
Investigation not completed	0	0	0	0	0	1	0	0	0	0	0	0	0

Table 2: The breakdown in case numbers by year, for the observer-initiated cases and the case progress, excluding cetaceans and whale sharks (CWS) and other pre-notification (PAI) cases

Case progress	2015	2016	2017	2018	2019	2020	2021	2022	2023
New Case	0	0	0	0	21	7	0	2	7
Ongoing	81	3	8	4	29	18	7	19	4
No infraction	2	18	56	2	17	1	0	1	16
Infraction - no sanction	0	0	0	0	0	0	0	2	0
Infraction - warning	0	0	1	0	2	0	0	0	0
Infraction - sanction	31	1	0	34	4	1	0	0	0
Investigation not completed	0	0	0	0	7	16	3	1	0

Table 3: The breakdown in case numbers by year for the Cetacean and Whale Shark (CWS) and Pre-notification (PAI) cases

Case progress	2016	2017	2018	2019	2020	2021	2022	2023
New Case	5	51	44	82	34	5	1	36
Ongoing	23	37	106	68	58	38	30	19
No infraction	12	9	21	11	2	1	0	0
Infraction - no sanction	2	0	2	4	0	0	0	0
Infraction - warning	5	12	4	3	0	0	0	0
Infraction - sanction	3	0	0	4	1	0	0	0
Investigation not completed	7	14	34	22	12	5	2	1

Report on cases closed

15. **Tables 1–3** show the number of cases that remain open and require further action. All but one of the cases closed with the INVESTIGATION NOT COMPLETED status originated from ROP data. The effect of the Cetacean and Whale Shark (CWS) and Pre-notification (PAI) case types on case closure is apparent, reflecting the more general scientific focus for ROP data standards for these case types. The ROP IWG is working to address issues with CWS and similar cases, to improve how observer reports

are transferred into CCFS, and create a standard process for using ROP data in CCFS to address CCM concerns about delays.⁴

16. Collectively, the Tables demonstrate consistent progress in progressing Article 25(2) cases to closure. By comparison, for ROP sourced data, proportionately there are fewer cases moving from open to closed particularly for events since 2020. As the cases have not been closed, they have aged, with cases since around mid-2022 now more than 24 months old.

Table 4: The number of observer-initiated cases and the number of ROP observer reports received (value in parenthesis)

Status	2017	2018	2019	2020	2021	2022	2023	2024	2025
New Case	51 (0)	44 (4)	103 (15)	41 (2)	5 (0)	3 (0)	43 (0)	0	0
Investigation in Progress	46 (9)	115 (10)	108 (21)	79 (12)	47 (7)	49 (5)	23 (0)	0	0
No infraction	65 (20)	27 (26)	28 (15)	3 (3)	1 (0)	1 (0)	16 (0)	0	0
Infraction - no sanction	0	2 (2)	5 (5)	0	0	2 (2)	0	0	0
Infraction - warning	15 (15)	5 (5)	6 (5)	0	0	0	0	0	0
Infraction - sanction	0	36 (36)	13 (10)	2 (2)	0	0	0	0	0
Investigation not completed	14 (4)	34 (11)	29 (6)	28 (7)	8 (1)	3 (0)	1 (0)	0	0

17. **Table 4** shows the number of cases sourced from ROP data. The figures represent the number of observer reports received at that case status. Most observer reports were provided for cases related to events in 2019. However, overall few ROP observer reports have been received by flag CCMs to support investigations. In most cases, less than 20% of cases have been supported by observer information during the NEW CASE and INVESTIGATION IN PROGRESS stages.
18. Where an observer report or equivalent supporting information has not been provided, the flag CCM will generally be unable to complete its investigation. This is reflected in **Table 4**, where the number of cases recorded as INVESTIGATION COMPLETED broadly aligns with the number for which observer reports were received. Minor differences in three instances may reflect data-entry errors or the circumstances of those cases.
19. In some cases, observer reports were received but the case was still given an INVESTIGATION NOT COMPLETED status. This may occur where the flag CCM was unable to take further action on the information provided, where the observer report did not cover all the case files for a particular event or trip, or where the observer report was supplied too late to allow for progress.

⁴ [TCC20 Outcomes](#), paras 16 & 50, [WCPFC-TCC21-2025-17](#) Update on ROP-IWG, [WCPFC-SC21-2025/ST-WP-10](#) Update on ROP-IWG Taskings and Proposed Changes to ROP Minimum Standard Data Fields

20. CCMs should note that the Secretariat anticipates the release of new cases from collected ROP data in the next few weeks. This is expected to include data related to 2025 trips, and there may also be ROP data for prior years.

Justification for case closure using Investigation Not Completed

21. There are five categories that define the reason for an INVESTIGATION NOT COMPLETED status:
- i. Crew/master changed
 - ii. Vessel or owner/operator no longer exists
 - iii. Date of event exceeds national statute of limitations
 - iv. Vessel changed flag and unable to proceed with new flag CCM
 - v. Other (only used in exceptional circumstances – to date, where the ROP provider could not locate the observer report.)
22. These categories provide a structured basis for recording why an investigation could not be completed, while maintaining the expectation that flag CCMs take appropriate action in response to alleged violations. **Table 5** provides a breakdown of the reasons for which the INVESTIGATION NOT COMPLETED status has been applied.

Table 5: Count of reasons for Investigation Not Completed status

All cases	No. of cases for each reason as reported to TCC	
Investigation Not Completed	2025	2026
Crew/master changed	390	404
Vessel or owner/operator no longer exists	274	426
Date of event exceeds national statute of limitations	129	510
Vessel changed flag and unable to proceed with new flag CCM	18	51
Other	1	2
Total	812	1393

23. **Tables 5 – 6:** These categories provide a structured basis for recording why an investigation could not be completed, while maintaining the expectation that flag CCMs take appropriate action in response to alleged violations. **Table 5** provides a breakdown of the reasons for which the INVESTIGATION NOT COMPLETED status has been applied. reflect the numbers of cases for each of the five reasons for case closure as INVESTIGATION NOT COMPLETED and the reasons for each case type.
24. The most common reasons are: crew/master changed, vessel or owner/operator no longer exists, and the date of event exceeds national statute of limitations. The Secretariat has noted a case that has exceeded a CCM's statute of limitations is often also associated with a statement that the crew/master has changed or that the vessel or owner/operator no longer exists.

Table 6: Reasons provided for cases where the investigation is not completed by case type as report in 2025 and 2026

Case type	Reason for no resolution	Total reported to TCC	
		in 2025	in 2026
VMS	Vessel changed flag and unable to progress with new flag CCM	1	1
FAI	Crew/master changed	4	4
	Vessel changed flag and unable to progress with new flag CCM	4	5
	Vessel or owner / operator no longer exists	7	8
	Date of event exceeds national statute of limitations	0	1
OAI	Crew/master changed	19	19
	Vessel or owner / operator no longer exists	11	12
	Date of event exceeds national statute of limitations	0	4
SHK	Date of event exceeds national statute of limitations	2	2
	Crew/master changed	7	7
	Vessel or owner / operator no longer exists	4	5
POL	Date of event exceeds national statute of limitations	2	7
	Crew/master changed	52	55
	Vessel changed flag and unable to progress with new flag CCM	2	4
	Vessel or owner / operator no longer exists	25	38
CWS	Date of event exceeds national statute of limitations	7	9
	Crew/master changed	93	104
	Vessel changed flag and unable to progress with new flag CCM	3	12
	Vessel or owner / operator no longer exists	69	102
PAI	Date of event exceeds national statute of limitations	118	487
	Other (eg AIS, transshipment)	1	2
	Crew/master changed	215	215
	Vessel changed flag and unable to progress with new flag CCM	8	29
	Vessel or owner / operator no longer exists	158	261

Conclusion

25. Overall, progress has been made in closing CCFS cases. The number of open cases decreased from 8,791 to 8,384, while the number of closed cases increased from 4,331 to 5,153. The use of the INVESTIGATION NOT COMPLETED status also increased from 812 to 1,393 cases.
26. Cases from ROP reporting cases remain more difficult to progress. Approximately 67% of the ROP-derived cases presented in **Tables 2** and **3** remain open, compared with 21% of Article 25(2) cases in **Table 1**. Delays in receiving observer reports and notifying cases mean that some cases may be difficult to complete because of national limitation periods or practical changes affecting the vessel, owner/operator, master or crew.
27. Continued work by the ROP IWG to improve the timeliness and quality of ROP information provided through the CCFS will be important. Guidance is also required on the treatment of recent potential ROP-derived cases that have not yet been entered into the CCFS.

Recommendations

28. TCC22 is invited to:
 - a. **note** the progress made in closing CCFS cases and the increased use of the INVESTIGATION NOT COMPLETED status to record why some investigations could not be completed;
 - b. **endorse** the prioritisation of the ROP IWG's work to improve the timeliness and quality of ROP information provided through the CCFS, including the provision of supporting observer reports;
 - c. **provide guidance** on the treatment of potential ROP-derived cases for the latter part of 2024 and for 2025 and 2026 that have not yet been entered into the CCFS, including the treatment of cases arising while revised CCFS processes are being developed and implemented; and
 - d. **consider** whether any further work is required to address other factors affecting the ability of flag CCMs to complete investigations within applicable national timeframes.