



TECHNICAL AND COMPLIANCE COMMITTEE

TWENTY-SECOND REGULAR SESSION

23-29 September 2026

Pohnpei, Federated States of Micronesia (Hybrid)

Recommended Technical CCFS Enhancements to Further Streamline the Management of CCFS Cases

WCPFC-TCC22-2026-DP01

24 August 2026

Submitted by the United States of America

Explanatory Note

On 29 May 2026, the United States submitted a delegation paper for the Regional Observer Programme Intersessional Working Group's (ROP-IWG's) consideration at ROP-IWG09: [ROPIWG09-2026-DP04](#). This paper responded to WCPFC22's tasking of the ROP-IWG in 2026 to consider U.S. proposals the Commission was unable to discuss in detail during WCPFC22—from [WCPFC22-2025-DP15](#), [-DP16](#), and [-DP17](#)—and to formulate recommendations for action to TCC22.

[ROPIWG09-2026-DP04](#) contained four technical recommendations for enhancing the WCPFC's Compliance Case File System (CCFS). During ROP-IWG09, some CCMs expressed support for the recommendations, while others preferred that the recommendations be submitted for further discussion to TCC22, as some of the recommendations are related to the broader operation of the CCFS, and are not limited to ROP-Sourced CCFS cases.

In response to the feedback received from ROP-IWG09, the United States is submitting this paper containing two recommendations for improving the CCFS for TCC22's consideration. The United States may raise other technical recommendations for future consideration pending outcomes of discussion at TCC22 on related materials, including the proposed Observer–CCFS Process Flow.

I. DRAFT TCC RECOMMENDATIONS

1. TCC22 recommends that WCPFC23 task the Secretariat with making the CCFS Case ID structure consistent across all types of new cases created in the online system.
2. TCC22 recommends that WCPFC23 agree to 1) add a new status of “Marked as CCM Completed” to the current list of Secretariat-assigned administrative “infringement statuses,” and 2) update the status given to new cases to note the automated investigation timeline, reading: “NEW CASE (initiate investigation & update by: [60-days])”.

II. DISCUSSION

On 29 May 2026, the United States submitted [ROPIWG09-2026-DP04](#) to the ROP-IWG ahead of its August meeting. This paper responded to WCPFC22's tasking of the ROP-IWG in 2026 to consider U.S. proposals the Commission was unable to discuss in detail during WCPFC22 – from [WCPFC22-2025-DP15](#), [WCPFC22-2025-DP16](#), and [WCPFC22-2025-DP17](#) – and to formulate recommendations for action to TCC22.

[ROPIWG09-2026-DP04](#) contained four technical recommendations for enhancing the CCFS. During ROP-IWG09, some CCMs expressed support for the recommendations, while others preferred that the recommendations be submitted for further discussion to TCC22, as some of the recommendations are related to the broader operation of the CCFS, and are not limited to ROP-Sourced CCFS cases.

The United States is making two recommendations for enhancements to the CCFS in this paper. The United States may raise other technical recommendations for future consideration pending outcomes of discussion at TCC22 on related materials, including the proposed Observer–CCFS Process Flow.

1. Standardization of the CCFS Case ID Structure for New CCFS Cases

The current CCFS “Case ID” structure applies different protocols for creating and naming CCFS cases depending on the source of the case. As a result, the Commission cannot accurately compare the numbers of different types of cases. It would be helpful if the CCFS Case ID structure were the same for all types of CCFS cases so the Commission could more accurately consider its case statistics.

Currently, cases stemming from observer reports typically get broken into separate cases based on the subject matter of the alleged violations. So, if an observer report identified three different types of alleged violations, e.g., a FAD violation, a reporting violation, and a VMS issue, three separate cases would be created in the case system. In contrast, in cases stemming from a High Seas Boarding and Inspection, only one case is created, even if the HSBI identified multiple types of alleged violations.

To streamline data analysis and ensure accurate comparison across all cases, the Commission should standardize the process for issuing CCFS Case IDs for all new CCFS cases. Note that there would be no effect on existing CCFS cases if this proposed recommendation is adopted. Either methodology could be used, but following the current process for cases stemming from observer reports would provide greater granularity in the types of alleged violations occurring.

Proposed TCC22 recommendation:

TCC22 recommends that WCPFC23 task the Secretariat with making the CCFS Case ID structure consistent across all types of new cases created in the online system.

2. Changes to CCFS Case Investigation Status Labels

The United States requests that TCC22 recommend two changes to the CCFS regarding the Secretariat's use of case Investigation Status labels (currently referred to in Secretariat materials as "Infringement Statuses"). There are currently nine Investigation Status labels used: 1) New Case; 2) Investigation in Progress; 3) Investigation Completed – No infraction; 4) Investigation Completed – Infraction – warning; 5) Investigation Completed – Infraction – sanction; 6) Investigation Completed – Infraction – no sanction; 7) Investigation not completed – vessel or owner/operator no longer exists; 8) Investigation not completed – date of exceeds national statute of limitations; and 9) Investigation not completed – vessel changed flag and unable to progress with new flag state.

First, an additional status for cases that have been completed by the CCM, but that are pending Secretariat review could be helpful. There can be a lag between when a CCM has completed a case and marked it as such (as illustrated below) and when the Secretariat is able to review it. To ensure an accurate count of cases currently pending at any given time, a proposed new status of "Marked as CCM Completed" could be a simple fix.

WCPFC > Compliance Case File System

Logged in as [redacted] Support My Account

Western and Central Pacific Fisheries Commission

Compliance Case File System

Secure Area

Case ID: US-[redacted]-[redacted]

2023 Investigation IN PROGRESS

Type: [redacted]

Parties Involved: Responsible CCM: [redacted] US FAOB

☐ CCM Completed

CCM considers that this case has been completed, in accord with CMS measure

Submit

Status History

- 2025 - Investigation IN PROGRESS (WCPFC Secretariat)

Western and Central Pacific Fisheries Commission

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Second, modifying the current “NEW CASE” investigation status to instead read, “NEW CASE (initiate investigation & update by: [60-days]),” with an automatically generated date, would also be useful in making clear the date by which an investigation must be initiated under the deadlines of Articles 23(5) and 25(2). This change would not modify any existing requirements and would not require that investigations be *completed* within a specific timeframe, but would make the deadline clearer.

Proposed TCC22 recommendation:

TCC22 recommends that WCPFC23 agree to 1) add a new status of “Marked as CCM Completed” to the current list of Secretariat-assigned administrative “infringement statuses” and 2) update the status given to new cases to note the automated investigation timeline, reading: “NEW CASE (initiate investigation & update by: [60-days])”).