



**TECHNICAL AND COMPLIANCE COMMITTEE
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Pohnpei, Federated States of Micronesia (Hybrid)

List of obligations for future CMS assessments

WCPFC-TCC22-2026-19

2 September 2026

Submitted by the TCC Chair and the Secretariat

Purpose

1. This paper proposes a list of obligations for assessment through the Compliance Monitoring Scheme (CMS) in 2027.
2. The Secretariat is trialing new methods of presenting information to improve the comprehension and readability of complex regulatory information. The proposed list of obligations for assessment is one of these items, and may be found in Annex 1.

Recommendations

3. TCC22 is invited to:
 - a. **note** the principles and considerations applied in developing the provisional list of obligations for assessment through the CMR in 2027 for RY2026;
 - b. **review** the provisional list of obligations set out in this paper, including the proposed balance between obligations assessed annually and those selected according to risk, Commission priorities, and periodic-review considerations;
 - c. **note** the recognised impracticality of adopting more than 50 obligations in each reporting year;
 - d. **note** that the obligations under CMM 2024-04 are not applicable to RY2026 because that measure does not enter into force until 1 January 2028; and
 - e. **recommend** that the Commission adopt a list for assessment through the CMR in 2027, subject to amendments agreed by TCC22, and any necessary updates arising from WCPFC23 decisions on relevant CMMs and audit points.

PROPOSED LIST OF OBLIGATIONS FOR CMS ASSESSMENT IN 2027

Working table for RY2026 · Limit of 50 obligations · Principles from CMM 2023-04 paragraph 6 and WCPFC-TCC20-2024-11

WHY THE CMS ASSESSES THESE OBLIGATIONS

CMM 2023-04 frames the Compliance Monitoring Scheme as the Commission's mechanism for determining whether CCMs implement Convention and CMM obligations. Each obligation proposed for the 2027 CMR should serve one or more of the five CMS purposes set out in CMM 2023-04.

PURPOSE A

Assess compliance — whether CCMs implement and comply with the obligation.

PURPOSE B

Capacity building — identify where technical assistance is needed to attain compliance.

PURPOSE C

CMM design — identify provisions that may require refinement or amendment for effective implementation.

PURPOSE D

Respond to non-compliance — through remedial or preventative options.

PURPOSE E

Follow-up — monitor and resolve outstanding instances of non-compliance.

PRINCIPLES USED TO BUILD THE LIST

Drawn from CMM 2023-04 paragraph 6 and the risk-based assessment framework discussion in WCPFC-TCC20-2024-11. More than one principle may apply to any obligation.

SELECTION PRINCIPLES (TCC20-2024-11)

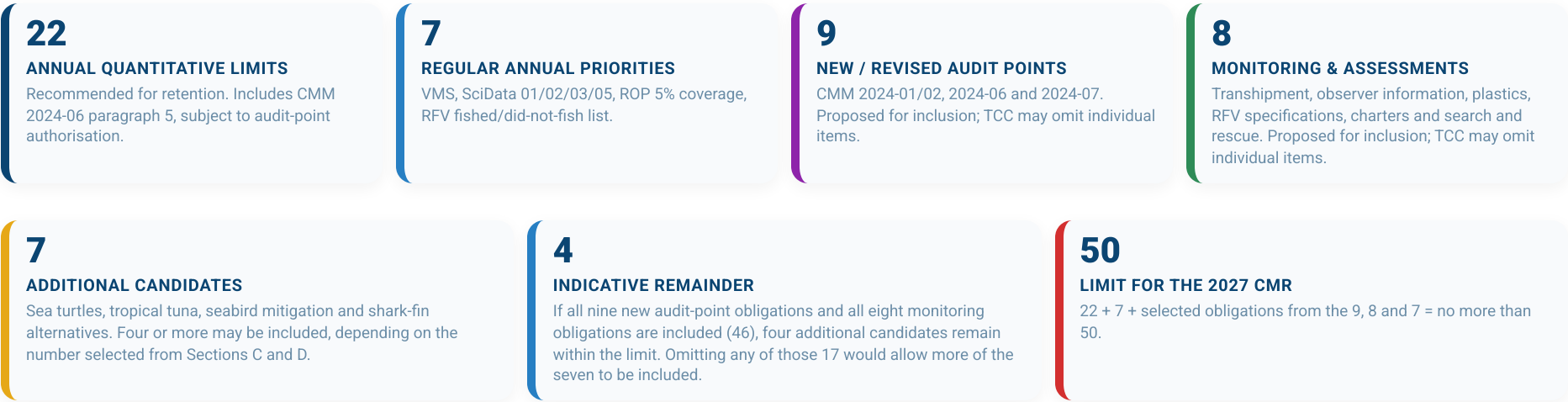
- a. Known compliance issues.** Prioritise obligations that generate Article 25(2) cases, CCFS themes, or monitoring-programme discrepancies (VMS, authorisation, marking, seabird mitigation, HSP, labour, bycatch gear).
- b. Risk (likelihood × consequence).** Use the RBAF ratings on the CMM pages as guidance — high consequence even at moderate likelihood supports inclusion.
- c. Current Commission priorities.** Align with SC22 advice to TCC22, stock-assessment schedules, and CMMs under review (tropical tuna, sharks, seabirds, turtles, cetaceans, PBF).

ADDITIONAL CONSIDERATIONS

- d. Adopted audit points, and no unresolved interpretation issues.** Prefer obligations that can be assessed against an agreed audit point. Where interpretation remains unresolved (obligations marked *), the Commission would need to authorise continued use of the existing audit point.
- e. New or amended obligations.** Benchmark implementation in the first 1–2 years after adoption or revision.
- Reporting burden.** A list of fewer than 50 obligations reduces the size of the draft CMR and allows TCC to give more attention to each obligation. Obligations reviewed for RY2025 are not carried forward unless they fall within an annual, new-audit-point, risk or periodic-review category.

COMPOSITION OF THE LIST

Active quantitative-limit obligations have a strong history of annual assessment; it is recommended that this momentum is continued. Seven further obligations are recommended for annual assessment because they underpin VMS, scientific data and the Record of Fishing Vessels. The remaining obligations are drawn from Sections C, D and E so that the list does not exceed 50.



APPLYING THE LIMIT OF 50

Twenty-nine obligations are recommended for annual assessment. Sections C, D and E supply the remaining places, up to 21. Inclusion of “four or more” of the seven additional candidates is not a separate allocation: it is the number that remains available after TCC has decided Sections C and D.

22 QL retain

 +

7 annual retain

 +

0–9 new AP

 +

0–8 monitoring

 +

0–7 additional

 =

≤ 50

All seven additional candidates may be included only if TCC omits at least three obligations from the proposed nine and eight (omitting a quantitative-limit obligation is not recommended). The seven are additional to those selected from the other sections; they do not replace the 22 quantitative limits. After the 29 recommended annual obligations, 21 places remain. TCC would fill those 21 from the 24 candidate obligations in Sections C, D and E.

A. ANNUAL QUANTITATIVE LIMITS – 22 RETAIN

Retain for RY2026. Items marked * have ongoing interpretation issues (including “fishing for / actively fishing”). WCPFC22 authorised the existing audit point for CMM 2024-06 §5 in the 2026 CMR; the same authorisation is needed for the 2027 CMR if no revised audit point is agreed.

#	OBLIGATION	TYPE	WHAT IS ASSESSED	BASIS FOR INCLUSION
1	CMM 2006-04 §1 * SP STRIPED MARLIN	QL	Limit number of vessels fishing for striped marlin south of 15°S to 2000–2004 levels.	Annual quantitative limit. Interpretation issues remain.
2	CMM 2009-03 §1 * SW PACIFIC SWORDFISH	QL	Limit number of vessels fishing for SW Pacific swordfish south of 20°S to any one year 2000–2005.	Annual quantitative limit. Interpretation issues remain.
3	CMM 2009-03 §2 SW PACIFIC SWORDFISH	QL	Limit SWO catch south of 20°S to any one year 2000–2006.	Annual catch limit.
4	CMM 2009-06 §29 HIGH SEAS TRANSHIPMENT	QL	PS transshipment outside port only for vessels with a Commission exemption; flag authorisation vessel-specific.	High-seas transshipment control. Persistent MCS theme.
5	CMM 2009-06 §34 HIGH SEAS TRANSHIPMENT	QL	Prohibit high-seas transshipment unless impracticability determined under §37 and advised to the Commission.	Core HS transshipment prohibition.
6	CMM 2024-06 §5 * NP STRIPED MARLIN	QL	Apply NP striped marlin catch limits for CCMs with vessels fishing north of the equator.	Annual quantitative limit. Continued audit-point authorisation and clearer reporting expectations are required.
7	CMM 2012-03 §2 NORTHERN OBSERVER COVERAGE	QL	Achieve 5% observer coverage of effort in each fresh-fish fishery beyond national jurisdiction north of 20°N.	Observer-coverage QL for northern fresh-fish fleet.
8	CMM 2015-02 §1 * SOUTH PACIFIC ALBACORE	QL	Limit vessels actively fishing for South Pacific albacore south of 20°S above 2005 or 2000–2004 levels.	Annual quantitative limit. Interpretation issues remain. South Pacific albacore remains an SC and TCC priority.
9	CMM 2016-02 §6 EASTERN HIGH SEAS POCKET	QL	Prohibit transshipment in the Eastern High Seas Pocket.	Geographic closure / HSP control.
10	CMM 2019-03 §2 * NP ALBACORE	QL	Ensure fishing effort for NP albacore is not increased.	Annual effort limit. Interpretation issues remain.
11	CMM 2025-02 §24 TROPICAL TUNA	QL	Apply purse-seine EEZ limits (SKJ, YFT, BET), including limits advised by other coastal CCMs.	Tropical tuna CMM. Annual catch/effort architecture.
12	CMM 2025-02 §25 TROPICAL TUNA	QL	Apply high-seas purse-seine effort limits 20°N–20°S.	Tropical tuna CMM. High seas effort limit.
13	CMM 2025-02 §38 TROPICAL TUNA	QL	Annual bigeye longline catch limits 2024–2026, including overage adjustments and any proportionate observer-coverage increase above 5% ROP.	BET management. Links catch limit to observer coverage.
14	CMM 2025-02 §41 TROPICAL TUNA	QL	BET longline catch limits by flag for certain other CCMs that caught <2,000 t in 2004.	Tropical tuna CMM – small- harvester schedule.
15	CMM 2025-02 §43 TROPICAL TUNA	QL	Limit, by flag, PS vessels >24 m with freezing capacity operating 20°N–20°S.	Capacity QL.

#	OBLIGATION	TYPE	WHAT IS ASSESSED	BASIS FOR INCLUSION
16	CMM 2025-02 §44 TROPICAL TUNA	QL	Report whether any large-scale PS vessel was replaced and that replacement did not increase carrying capacity or catch/effort.	Vessel-replacement and capacity control.
17	CMM 2025-02 §45 TROPICAL TUNA	QL	Limit, by flag, longline vessels with freezing capacity targeting BET above current level (domestic-quota exemption).	BET longline capacity QL.
18	CMM 2025-02 §46 TROPICAL TUNA	QL	Limit, by flag, ice-chilled longline vessels targeting BET and landing exclusively fresh fish (domestic-quota / limited-entry exemption).	Fresh-fish BET capacity QL.
19	CMM 2023-02 §2 PACIFIC BLUEFIN	QL	Limit total PBF effort north of 20°N to 2002–2004 levels.	PBF effort QL. Complements new 2024-01/02 reporting APs.
20	CMM 2023-02 §3 PACIFIC BLUEFIN	QL	Apply PBF catch limits for Japan, Korea and Chinese Taipei.	PBF catch QL for principal fishing CCMs.
21	CMM 2023-02 §4 PACIFIC BLUEFIN	QL	Apply catch limits for PBF ≥30 kg for certain other members.	PBF large-fish schedule.
22	CMM 2023-03 §2 * NP SWORDFISH	QL	Limit fishing effort by fisheries taking more than 200 mt of North Pacific swordfish.	Annual quantitative limit. Interpretation issues remain.

Reporting against several obligations marked * remains inconsistent among CCMs. Their inclusion is useful only if WCPFC23 adopts a revised audit point or again authorises the existing audit point and records the interpretation issue in the CMR.

B. REGULAR ANNUAL PRIORITIES – 7 RETAIN

The Commission has typically retained the following obligations for annual assessment because they underpin monitoring, scientific assessment and the Record of Fishing Vessels. The justification against the TCC20 principles is set out so that the basis for annual retention is clear.

#	OBLIGATION	TYPE	WHAT IS ASSESSED	JUSTIFICATION (PRINCIPLES A–E)
23	CMM 2014-02 §9a VMS	IM	Fishing vessels comply with Commission VMS standards, including ALC/MTU that meet Commission requirements.	a, b, c. Highest-volume MCS theme in Article 25(2) history. VMS is the foundation of HSBI, effort verification and QL assessment. Should remain subject to annual assessment.
24	SciData 01 SCIENTIFIC DATA	RP	Estimates of annual catches.	c. Indispensable input to every stock assessment. SC22 advice on data gaps supports continued annual assessment.
25	SciData 02 SCIENTIFIC DATA	RP	Number of active vessels.	c. Required to interpret effort QLS and fleet-capacity provisions in CMM 2025-02.
26	SciData 03 SCIENTIFIC DATA	RP	Operational-level catch and effort data.	a, c. Operational data quality is the binding constraint on tropical-tuna, albacore and billfish assessments.
27	SciData 05 SCIENTIFIC DATA	RP	Size-composition data.	c. Directly supports the revised shark-assessment timing and PBF / BET selectivity work flagged by SC22.
28	CMM 2018-05 Ann. C §6 REGIONAL OBSERVER PROGRAMME	RP	Achieve 5% observer coverage of effort in each fishery under Commission jurisdiction.	a, b, c. ROP coverage remains the principal independent source for bycatch, labour and catch-composition compliance. Incomplete longline coverage remains a recognised compliance risk.

#	OBLIGATION	TYPE	WHAT IS ASSESSED	JUSTIFICATION (PRINCIPLES A–E)
29	CMM 2018-06 §9 RECORD OF FISHING VESSELS	RP	Submit to the Executive Director the list of all vessels on the national record in the previous year, marked FISHED or DID NOT FISH.	a, d. RFV integrity underpins authorisation, VMS, HSBI targeting and every vessel-based QL.

C. RECENTLY ADOPTED AUDIT POINTS — 9 PROPOSE

Principle **e**: benchmark new or amended measures in the first 1–2 years. WCPFC22 adopted or revised audit points for Pacific bluefin (CMM 2024-01 / 2024-02), North Pacific striped marlin (CMM 2024-06) and cetaceans (CMM 2024-07). TCC may include all nine, or omit individual items if places are to be reserved for Section E. CMM 2024-07 paragraphs 1 and 2 were last assessed in 2022, before audit points were adopted.

#	OBLIGATION	TYPE	WHAT IS ASSESSED	LAST ASSESSED	BASIS FOR PROPOSAL
30	CMM 2024-01 §10 PACIFIC BLUEFIN	RP	Intensify cooperation on PBF implementation, including juvenile-catch reduction; prevent age-0 (<2 kg) catch increasing beyond 50% of 2002–2004 levels.	Not assessed	New AP. Complements the three standing PBF QLS. SC priority stock.
31	CMM 2024-02 §2 PACIFIC BLUEFIN	RP	Annual report on monitoring and control measures taken in the previous year to ensure compliance with PBF CMMs.	Not assessed	New AP. First implementation benchmark.
32	CMM 2024-02 §3 PACIFIC BLUEFIN	RP	Report recent annual PBF bycatch by CCMs that do not have PBF fisheries and/or farming.	Not assessed	New AP. Addresses reporting by CCMs without a Pacific bluefin fishery or farming operation.
33	CMM 2024-06 §10 NP STRIPED MARLIN	RP	Report implementation of CMM 2024-06 for NP striped marlin, including against the CMM limits (AR Pt 2).	Not assessed	New AP. Pairs with the §5 QL that still has interpretation issues.
34	CMM 2024-07 §1 CETACEANS	IM	Prohibit purse-seine setting on cetaceans if the animal is sighted before the set commences.	2022 (pre-AP)	Revised AP. First scored assessment against the adopted point.
35	CMM 2024-07 §2 CETACEANS	IM	Requirements if a cetacean is unintentionally encircled, including incident reporting.	2022 (pre-AP)	Revised AP. Incident-reporting is the auditable core.
36	CMM 2024-07 §3 CETACEANS	IM	Prohibit harvesting, retaining, transshipping or landing cetaceans.	Not assessed	New AP. Retention ban has not been scored.
37	CMM 2024-07 §4 CETACEANS	IM	Release of cetaceans by longline vessels.	Not assessed	New AP. Longline interaction rules untested in CMR.
38	CMM 2024-07 §5 CETACEANS	IM	Safe-release requirements for cetaceans.	Not assessed	New AP. Completes assessment of CMM 2024-07 as a single initial benchmark.

Assessing all five CMM 2024-07 obligations together would provide a single initial benchmark for the measure. If some must be omitted, paragraphs 3–5 (not previously assessed) should be retained in preference to paragraphs 1–2 (assessed in 2022, before audit points).

D. OBLIGATIONS SUPPORTING MONITORING AND STOCK ASSESSMENTS – 8 PROPOSE

Adopted audit points exist. Several have never been assessed, or have not been assessed since 2020–2023. They support high seas boarding and inspection, the use of observer information, vessel authorisation, charter notification and the plastics prohibition – all current TCC or SC priorities.

#	OBLIGATION	TYPE	WHAT IS ASSESSED	LAST ASSESSED	BASIS FOR PROPOSAL
39	CMM 2009-06 §11 HIGH SEAS TRANSHIPMENT	RP	Annual reporting of transshipment activity.	2023	Periodic review of the principal HS transshipment RP. Pairs with §§29 and 34 QLs.
40	CMM 2017-03 §11 OBSERVER SAFETY	RP	National observer providers take specified actions to support implementation of CMM 2017-03 (protection of observers).	Not assessed	Not previously assessed. Observer safety and provider obligations remain a priority for SIDS and for work on crew conditions.
41	CMM 2017-03 §12 OBSERVER SAFETY	RP	Available HSBI inspection vessels and fishing vessels participate, to the extent possible, in search-and-rescue operations.	Not assessed	Not previously assessed. Complements the HSBI scheme and the observer-protection measure.
42	CMM 2017-04 §2 MARINE POLLUTION	IM	Prohibit discharge of plastics (packaging, plastic items, polystyrene) from fishing vessels, excluding fishing gear.	2023	Periodic review. Marine-pollution IM with a clear audit point.
43	CMM 2018-05 §11 REGIONAL OBSERVER PROGRAMME	RP	Use observer information for investigations under Convention Articles 23 and 25, and cooperate in exchanging that information to Commission standards.	Not assessed	Not previously assessed. Links Regional Observer Programme information to investigations under Articles 23 and 25.
44	CMM 2018-06 §4 RECORD OF FISHING VESSELS	RP	Vessel-authorisation requirements.	IM assessed 2024; RP not assessed	The reporting obligation has not been assessed. Principle a – vessel authorisation is a frequent CCFS theme.
45	CMM 2022-05 §2 RECORD OF FISHING VESSELS	RP	Requirements and specifications implementing CMM 2018-06 §6, including complete vessel data for vessels authorised to fish beyond the flag CCM's national jurisdiction.	Not assessed	Not previously assessed. Complete RFV data are required for VMS and HSBI targeting.
46	CMM 2024-03 §3 CHARTER NOTIFICATION	RP	Notify charter arrangements to the flag CCM and Executive Director, including additions, changes and terminations.	2020	Last assessed in 2020. Charter notification is required to attribute effort and catch against quantitative limits.

If some of these eight must be omitted, priority against principles a–c should be given to CMM 2018-05 paragraph 11 (observer information for investigations), CMM 2018-06 paragraph 4 and CMM 2022-05 paragraph 2 (authorisation and RFV specifications), and CMM 2009-06 paragraph 11 (transshipment reporting). CMM 2017-04 paragraph 2 (plastics) is the strongest candidate for later review.

E. ADDITIONAL CANDIDATE OBLIGATIONS – 7 CANDIDATE - FOUR OR MORE

These seven obligations may be used to complete the list after Sections C and D have been decided. Most already have an audit point, or WCPFC22 directed that they be assessed against the existing audit point. CMM 2025-02 paragraph 48 is a quantitative limit that has not previously been assessed; baseline and applicability questions remain. Audit points are still required for CMM 2025-05 paragraphs 1, 3 and 7. Paragraph 2 of that measure does not enter into force until 1 January 2028.

#	OBLIGATION	TYPE	WHAT IS ASSESSED	AUDIT-POINT STATUS	CONSIDERATION FOR TCC
47	CMM 2018-04 §7(d)(e) SEA TURTLES	IM / RP	Recording and reporting sea-turtle interactions.	Existing AP. Interpretation issues previously noted.	SC22 reviewed the sea-turtle measure. Consistent with principle c. Recommended if the sea-turtle measure review requires an implementation benchmark.
48	CMM 2025-02 §48 TROPICAL TUNA	QL	Limits for other commercial tropical-tuna fisheries.	Needs AP / baseline / applicability work.	The only tropical-tuna quantitative limit not previously assessed. Include if WCPFC23 resolves baseline and applicability; otherwise omit.
49	CMM 2025-02 §26 TROPICAL TUNA	IM	Transfer of purse-seine effort outside 20°N–20°S.	Existing AP used for RY2025.	Recommended if TCC wishes to monitor displacement of purse-seine effort from 20°N–20°S.
50	CMM 2025-02 §33 TROPICAL TUNA	IM	Carriage of ROP observers by purse-seine vessels.	Existing AP used for RY2025.	Complements the annual 5% coverage reporting obligation. Relevant while observer coverage remains under discussion.
51	CMM 2025-05 §3 SEABIRDS	IM	Required seabird mitigation for longline vessels fishing east of 175°W between 25°S and 30°S.	AP still required for §§1, 3, 7.	Include only if WCPFC23 adopts the audit point. HSBI data already flag tori-line non-compliance as a recurrent gap.
52	CMM 2025-05 §7 SEABIRDS	IM	Required LL mitigation north of 23°N: vessels >24 m choose 2 from Table 1 (at least 1 from Column A); vessels <24 m at least 1 from Column A.	AP still required.	Same condition as §3. Northern mitigation requirements. Principle a – non-compliant seabird mitigation gear is a recurrent HSBI finding.
53	CMM 2025-06 §11 SHARKS	RP	Enforcement difficulties associated with alternative shark-fin measures.	AP under review. WCPFC22 agreed inclusion in 2026 CMR (RY2025) on the existing AP.	WCPFC22 directed that this obligation be included in the 2026 CMR. Continued inclusion in 2027 would maintain continuity while the audit point is finalised.

INDICATIVE LIST OF 50 OBLIGATIONS

Retain 29 — all 22 quantitative-limit obligations and all seven annual priorities.

Include all nine obligations with recently adopted or revised audit points (Pacific bluefin, North Pacific striped marlin and CMM 2024-07).

Include all eight monitoring and stock-assessment obligations.

Include four additional candidates: CMM 2018-04 paragraph 7(d) and (e) (sea turtles); CMM 2025-02 paragraph 33 (purse-seine observers); CMM 2025-06 paragraph 11 (shark-fin alternatives); and either CMM 2025-02 paragraph 26 (effort transfer) or paragraph 48 (if the audit point, baseline and applicability are resolved).

Defer the two seabird implementation obligations until WCPFC23 adopts audit points, unless TCC prefers to include them in place of a Section D obligation.

NOT PROPOSED FOR THE 2027 CMR

CMM 2024-04 (crew labour standards) is not applicable to RY2026. It enters into force on 1 January 2028. TCC22 is invited to note this so that the obligation is not added in error.

CMM 2025-05 §2 (additional seabird mitigation) does not take effect until 1 January 2028.

CMM 2025-04 §§8–15 (PS catch retention and Catch Discard Reports) still need audit points. High seas FAD closures in the same measure (paragraphs 3–7) already have audit points. They are not listed here because they were not included in the Chair's proposed menu.

Obligations assessed for RY2025 are not carried forward unless they appear in Sections A–E above.

Working table to accompany WCPFC-TCC22-2026-19 (31 August 2026). Sources: CMM 2023-04 paragraph 6; WCPFC-TCC20-2024-11 principles a–e; WCPFC-TCC22-2026-19; SC22 advice to TCC22 (WCPFC-TCC22-2026-22). Obligations marked * require continued audit-point authorisation and have unresolved interpretation issues.