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Discussion Paper on the CCFS Process Flow

WCPFC-TCC22-2026-24A_Rev01¹

15 September 2026

Submitted by the ROPIWG Chair

Purpose

1. This paper provides an updated working draft of the proposed Commission CCFS Process Flow. This draft takes into account feedback and discussions at ROPIWG meetings during 2026.

Introduction

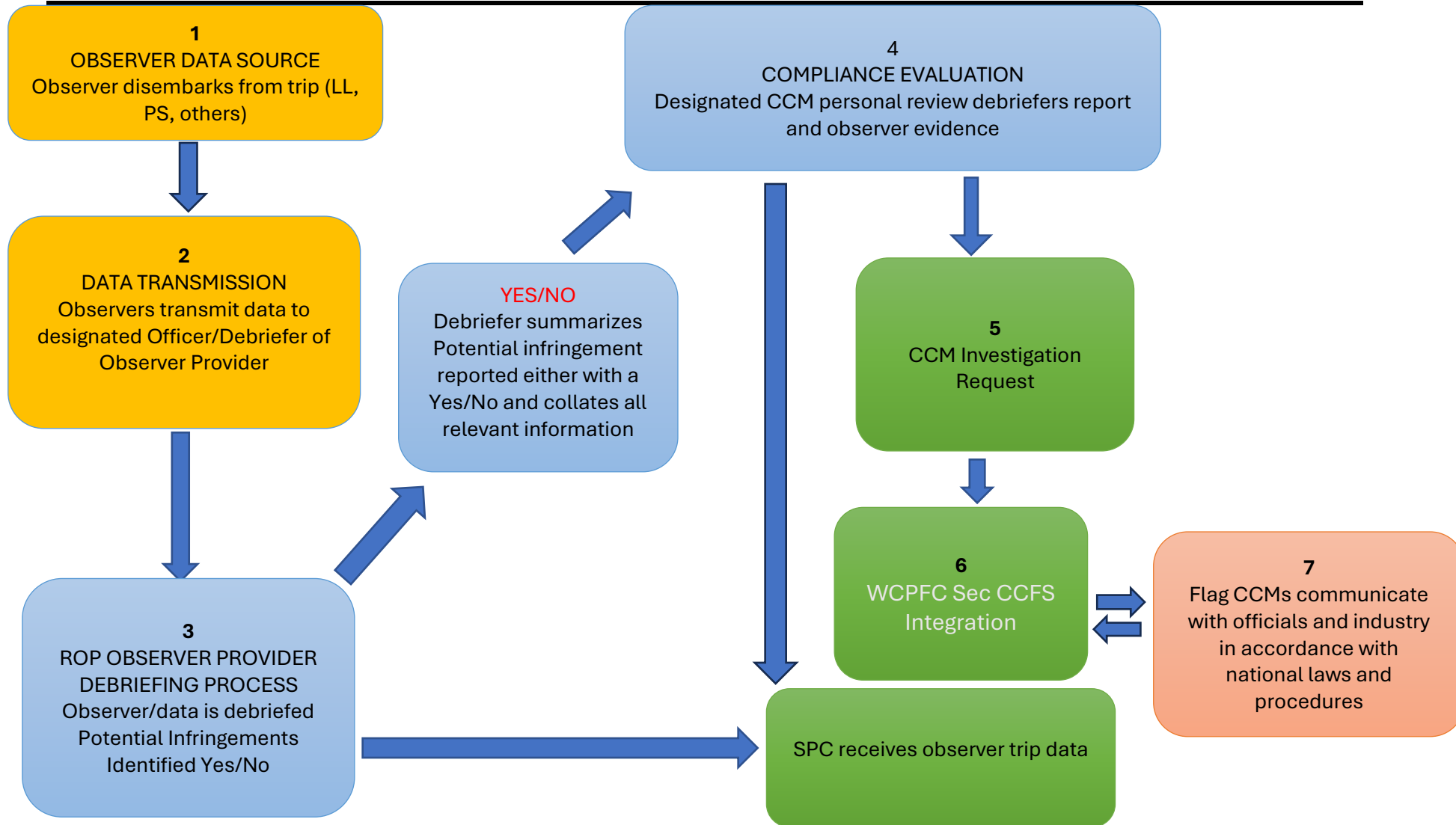
2. At TCC20, the Committee recommended that the Commission task the ROPIWG to review the ROP Minimum Standard Data Fields and the pre-notification process adopted at WCPFC12, and to develop a standardised process for using ROP observer data in the Compliance Case File System (CCFS).
3. Subsequent work has focused on addressing delays in notifying potential infringements and improving the information available to support CCM investigations. The proposed approach incorporates observer debriefing, data verification and compliance evaluation before a potential infringement is referred to the responsible CCM and entered into the CCFS.
4. Following further consideration by TCC21, WCPFC22 and the ROPIWG during 2026, the updated process flow and descriptions below clarify the proposed steps, responsibilities and information requirements. TCC22 is invited to provide directions on the outstanding matters to support finalisation of the process.

Proposed CCFS process flow

1. The following diagram and supporting notes set out the proposed new process flow to support the more efficient creation of cases based on information reported by observers.
2. Potential compliance queries, particularly as the Secretariat continues to develop tools to detect vessel proximity.

¹ Updates Annex 1 Sample WCPFC ROP Trip Monitoring Summary Questionnaire to include final sections and makes some corrections to the mobilid section.

Observer Provider – Commission CCFS process flow



Investigation outcome reported to Commission by Observer Provider and Flag CCM. Responses from other interested parties were relevant. Records of outcomes of investigations related to alleged infringements to be maintained Flag CCM and any other parties to the Case. Case progress review process administered by the WCPFC Secretariat

Notes to process flow diagram:

1. Observer Data Source

- Observer disembarks
- Once the observer disembarks in port (home or foreign) the trip data is expected to be completed upon disembarkations or whilst observer is in port during back-to-back trips. The phrase “trip data” refers to end data collections, written reports, and any other observer sourced evidence from the trip.
- Observer will notify observer provider to arrange for debrief and repatriation

CMM (agreed minimum standards and guides of ROPs) Standard requirement - IWGROP2/TCC4/WCPFC5

Note that the requirements set out in [CMM 2017-03](#) Conservation and Management Measure for the protection of WCPFC Regional Observer Programme Observers would also apply to matters related to the health, safety and welfare of observers.

2. Data transmission from Observer to Debriefing Observer Provider

- Observer provides trip data either through hard copy in port or by ER processes (observer – ER database) to the Debriefing Observer Provider

Note that within the Pacific Islands region, there are often existing arrangements that facilitate an observer being debriefed by another debriefing observer provider. For example, SBOB on POA trip is debriefed by PGOB debriefer.

3. ROP Observer Debriefing Process (WCPFC ROP Trip Monitoring Summary Questionnaire in Annex 1)

- Observer trip data for each ROP Trip is debriefed by a Regional Observer Provider CCM, coastal CCM, or other designated CCM (the “Debriefing Observer Provider” or “debriefers”)
- Debriefing will be conducted in line with the most recent WCPFC ROP Agreed Minimum Standards and Guidelines (last updated in 2025).
- Debriefing will prioritize any potential infringements against from the agreed -upon listed of CMMs’ paragraphs identified either with a YES/NO through in a “WCPFC ROP Trip Monitoring Summary Questionnaire”
- If on the WCPFC ROP Trip Monitoring Summary Questionnaire, the debriefer gives a “YES” to indicate an alleged infringement of in any or all of the agreed/listed CMMs paragraphs in the WCPFC ROP Trip Monitoring Summary Questionnaire, that form with supporting observer -sourced evidence (photo/video/statement), is then compiled and passed on to the **designated CCM’s personnel/contacts in Step 4** to verify and validate the debriefers’ potential compliance summary report generated from the WCPFC ROP Trip Monitoring Summary Questionnaire.
- If a “NO” is attained from the WCPFC ROP Trip Monitoring Summary Questionnaire on the listed CMM paragraphs, the debriefer then passes on a signed copy noting the trip data has been verified and confirmed no CMM potential violation been reported. CCM’s vetting

personal/contacts to confirm and indicate the trip data is cleared and notifies the Regional Observer Programme to send to SPC for scientific purposes and archiving.

4. Compliance Evaluation and Vetting

- The CCM designated vetting personal/contact will review the verified WCPFC ROP Trip Monitoring Summary Questionnaire with supporting observer-sourced evidence (the “debriefers’ report”) and complete an “Infringement Notification Form/Report” (data), if potential infringements indicated in the debriefers report are established to be genuine with supporting observer-sourced evidence/information obtained from the observer report.
- At this step, a full observer-sourced case package is compiled with the following details.
 1. An Infringement Notification Form/Report outlining the:
 - a. Vessel and Trip Details,
 - b. Infringement Descriptions (Date/Time, Location, Set/Species #, etc.),
 - c. Compliance Analysis,
 - d. Recommendation for flag/coastal CCM investigations.
 2. A signed and verified WCPFC ROP Trip Monitoring Summary Questionnaire with supporting observer-sourced evidence (photo/video, observer statement or crew statement, including relevant observer reports).
- These details will be then used under CMM 2018-05 paragraph 11, to trigger an Article 23(5) or Article 25(2) CCM request in **Step 5** for investigations by the flag CCM into the infringement occurred. This request will also copy the coastal CCM and chartering CCM (if any).
- If the compliance evaluation carried out resulted in NO CASE (due to insufficient observer information and or evidence), the data is given a CLEARED authenticity on the WCPFC Debriefers Report Form (Trip Monitoring Summary Questionnaire) and submitted to SPC.

5. Referral Notice and Formal Investigation Request

- The “Initiating CCM” (Regional Observer Provider CCM, coastal CCM, or other designated CCM responsible for debriefing and compliance evaluation/vetting), submits a formal request and supporting documentation to the flag CCM, copying the coastal CCM and chartering CCM, if any, to investigate the alleged violation, as outlined in **Step 4**.
- The formal request is transmitted via email and/or on the CCFS system attaching the observer-sourced case package and, if emailed, copying the WCPFC Secretariat for CCFS integration in **Step 6**.

6. WCPFC Secretariat CCFS Integration²

² US comment - Note that if the WCPFC eventually creates an ‘ROP Portal’ (similar to the ‘HSBI Portal’ implemented in 2025), then an Initiating CCM in Step 5 would also create a CCFS case in the ROP Portal and upload the Case Package described in Step 4; and Step 6 would be comprised of the Secretariat’s review of the ROP-Portal entry to finalize the creation of a case in CCFS for tracking and centralized record-keeping purposes.

- Upon receipt of a copy of the initiating CCM's formal request and documentation, the Secretariat enters the case into the CCFS together with all supporting documentation, (creating a case ID) for tracking and centralized record-keeping of the case until it is closed.
- The investigation outcomes and data from this process and through the CCFS are then considered in the CMS process for inclusion in the CMR, ensuring timely and accurate compliance assessments.

7. Investigations of Alleged Infringements and Domestic Enforcement

- The responsible flag CCM acts on a formal investigation request to investigate, prosecute, and penalize proven infringements in accordance with national laws.
- The responsible flag CCM (and any other notified CCMs wishing to do so) provide, through the CCFS, progress reports within two months of the initial notification (and within two months of any request for an update thereafter), per Articles 25(2) and 23 (5) of the Convention.

Recommendations

1. TCC22 is invited to:
 - a. **review** the proposed CCFS process flow and identify any remaining matters to support finalising the paper for adoption at WCPFC23.

A Sample WCPFC ROP Trip Monitoring Summary Questionnaire

Trip Information

- Observer Name: _____
- Observer Programme: _____
- Vessel Name: _____
- Flage CCM: _____
- Trip Start Date: _____
- Trip End Date: _____
- Total Number of Sets: _____
- ROP Trip ID: _____

Trip Monitoring Summary Questionnaire

The following table lists questions related to the potential compliance issues under the agreed lists of WCPFC CMMs for the CCFS purposes. Check YES or NO for each question. For ANY responses requiring further information, provide details (e.g., date, time, location, coordinates, set number) in the Details column or attached additional documentation -such as photos, videos and statements.

Note the information in the following sample, if agreed, would be updated to reflect new CMMs and changes through decisions on the “Scope of Monitoring for CCFS Case” also being discussed by the ROPIWG in parallel with the CCFS Process Flow

CMM 2018-05 (Regional Observer Programme), Paragraph 15(g) and Annex B			
QUESTIONS	YES	NO	Details (Date, Time, Location, Who, Notes)
1. Were there any instances during the trip where observer duties were obstructed (e.g., captain’s directives, crew interference)? <i>If YES, provide details in observer report.</i>	✓		<i>e.g; Observer was assaulted by the radio operator on xx/xx/2025, inside XX EEZ. Observer statement attached.</i>
2. Were there any instances where the observer was intimidated, resisted or delayed in performing duties, per Annex B (2(m), 4(a))? <i>If YES, provide details in observer report.</i>			

CMM 2017-04 (Marine Pollution), Paragraph 2			
QUESTIONS	YES	NO	Details (Date, Time, Location, Who, Notes)
3. Were there any instances during the trip where plastics (e.g., packaging, items containing plastic, polystyrene) were discharged from the vessel? <i>If YES, provide details (e.g., material type, time, date coordinates, location) in observer report.</i>			<i>e.g Date: April 26, 2025; Time: 14:30; Coordinates: 2°S, 175°E; Location: XX EEZ; Notes: Observer noted a paper box containing plastic packaging discarded overboard.</i>
CMM 2023-01 (Tropical Tuna), Paragraphs 13-14 & 16			
QUESTIONS	YES	NO	Details (Date, Time, Set No's, Location, Notes)
4. Were there any instances during the trip where FADs were deployed, serviced, or set on between July 1 and August 15 in EEZs or high seas between 20N and 20S? <i>If YES, specify set numbers and details (date, time, coordinates, location).</i>			
5. Were there any instances during the trip where FADs were deployed, serviced or set on in high seas during the CMM's notified 1-month closure (April, May, November or December) <i>If YES, specify set numbers and details.</i>			<i>e.g No high seas FAD activity; CCM notified April closure, but trip sets were in EEZ.</i>
6. Were any FADs observed to use entangling materials (e.g., mesh nets on any part of the FAD, or entangling raft/subsurface designs), violating Paragraph 16? <i>If YES, specify set numbers / FADs observed and details (material type, description).</i>			
CMM 2025-06 (Sharks), Paragraph 7-9, 24(1-2)			
QUESTIONS	YES	NO	Details (Date, Time, Set No's, Location, Notes)

7. Were there any instances of finning observed (i.e. shark fins removed and retained while the carcass was discarded at sea)? <i>If yes, provide details in observer report</i>			
8. Were there any instances where oceanic whitetip or silky sharks were retained onboard, transshipped, stored, or landed in whole or in parts? <i>If YES, specify set numbers, species, quantities and details.</i>			
9. Were there any instances where oceanic whitetips or silky sharks were not promptly released with minimal harm (e.g., not following safe release guidelines), despite no particular concern about the safety of the crew? <i>If YES specify set numbers and details (e.g., condition: alive/dead)</i>			<i>e.g., Set 20; Date: April 20, 2025.</i> <i>Time: 10:15; Coordinates: 1°S, 176°E; Location: XX EEZ; Notes: Silky sharks not released promptly; one appeared injured.</i>

CMM 2025 -06 (Whale Sharks), Paragraph 25 (1-2 & 5)			
QUESTIONS	YES	NO	Details (Date, Time, Set No's, Location, Notes)
10. Were there any sets where a purse seine was set on a tuna school associated with a whale shark sighted prior to the set (paragraph 25 (1))? <i>If YES specify set numbers and details (date, time, coordinates, locations)</i>			<i>e.g; No whale shark sightings reported.</i>
11. Were there any instances where whale sharks were retained, transshipped or landed, in whole or in part (paragraph 25(2))? <i>If YES, specify set numbers and details.</i>			<i>e.g; No whale shark retention reported.</i>
12. For sets with incidental whale shark encirclement, was safe release not performed per paragraph 25(5)(a) or incident reporting not			<i>e.g; Not applicable; no encirclements reported.</i>

completed per paragraph 25(5)(b)? <i>If YES, specify set numbers and details.</i>			
CMM 2024-07 (Cetaceans), Paragraphs 1- 3 &5			
QUESTIONS	YES	NO	Details (Date, Time, Set No's, Location, Notes)
13. Were there any sets where a purse seine was set on a tuna school associated with a cetacean sighted prior to the set (paragraph 1)? <i>If YES specify set numbers and details (date, time, sets no's, location).</i>			
14. Were there any sets where cetaceans were unintentionally encircled, and the net roll was not stopped or safe released was not ensured per paragraph 2(a)? <i>If YES specify set numbers and details (e.g., observed handling conditions)</i>			
15. Were there any sets where cetacean encirclement incidents were not reported per paragraph 2(b)? <i>If YES specify set numbers and details.</i>			
16. Were there any instances where a cetacean was retained onboard, (in whole or part) (paragraph 3)? <i>If yes, specify set numbers and details</i>			
17. Were the Commission-adopted best practices for the safe handling and release of cetaceans or SSI not followed during any cetacean interactions (paragraph 5)? <i>If yes, specify set numbers and details ..review</i>			
18. Were there any sets where cetaceans were retained, transshipped or landed, in whole or in			

parts (paragraph 3)? <i>If YES, specify set numbers and details.</i>			
19. Were there any sets in long line fisheries where entangled cetaceans were not released with minimal harm per paragraph? <i>If YES, specify set number and details.</i>			
CMM 2019-05 (Mobulid Rays), Paragraph 3-5			
QUESTIONS	YES	NO	Details (Date, Time, Set No's, Location, Notes)
20. Were there any sets involving targeted fishing or international setting on mobulid rays (paragraph 3)? <i>If YES specify set numbers and details (date, time, sets no's, location).</i>			
21. Were there any sets where mobulid rays were retained, transshipped or landed (in whole or in parts), except as per paragraph-6 4 (purse seine surrender to authorities)? If YES, specify set numbers and details.			
22. Were there any instances where mobulid rays were not promptly released alive and unharmed or did not follow Annex 1 handling practices (paragraph 5), despite no particular concern about the safety of the crew? <i>If YES specify set numbers and details.</i>			<i>e.g; No mobulid ray interactions reported.</i>
23. Were there any sets in long line fisheries where entangled mobulids were not released with minimal harm per paragraph? <i>If YES, specify set number and details.</i>			

Action Required

- For any YES response, immediately submit this form/report to the designated CCM's personal/ contacts WCPFC Compliance Contact for compliance cases evaluation and vetting.
- Ensure all YES responses are detailed in this form/report, including set numbers, dates and times, coordinates, and other relevant information.

Debriefers Certification

I certify that this report accurately reflects the observer's responses during the debriefing conducted on [Date: _____] and aligns with the questionnaire's guidelines.

• Debriefers Name: _____ Observer Name: _____

• Signature: _____ Signature: _____

FOR COMPLIANCE OFFICIAL USE ONLY [Tick the appropriate box]	
☐	No Potential Compliance Issue – Trip Data is CLEARED
☐	Potential Compliance Issues – Trip Data is being Notified to relevant CCMs for investigations