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**Implementation and Cost Considerations for Proposed Changes to the
Compliance Case File System (CCFS)**

**WCPFC-TCC22-2026-IP04_suppl
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Submitted by the Secretariat

Purpose

1. This paper sets out the technical feasibility, workplan impacts and preliminary financial implications of proposed changes to the Compliance Case File System (CCFS). The proposals comprise technical changes initially proposed by the United States at TCC21 and WCPFC22, together with changes arising from ROP-IWG work on the process for reviewing observer information and transferring information for case creation in CCFS.

Background

2. TCC21 and WCPFC22 considered several United States proposals for changes to CCFS. WCPFC22 supported four technical enhancements, subject to technical feasibility, minimal impact on the Secretariat workplan and no significant additional Secretariat resources¹:
 - a. case notification for reflagged vessels,
 - b. automated investigation timelines,
 - c. improved messaging tool identifiers, and
 - d. identification of multiple initiating CCMs for a case.
3. At WCPFC22, the Secretariat provided an initial high-level estimate of US\$11,000–13,000 for the design, development, and deployment of these four changes. The estimate treated the proposals as standalone changes and did not take account of potential efficiencies from implementing them alongside subsequent CCFS changes.
4. Other United States proposals were referred to, or subsequently considered through, the ROP-IWG. In parallel, the ROP-IWG has been developing changes to the process by which observer information

¹ [WCPFC22-2025-09_Rev01](#) , paragraphs 42-32 Outcomes from the 21st Regular Session of the Technical and Compliance Committee: Next Steps

indicating potential infringements is reviewed and relevant information provided for case creation in CCFS. This work has resulted in a broader package of potential CCFS changes for consideration by TCC22.

Proposed changes to CCFS

- Proposed changes and their origins are summarised in Table 1. The proposals include both changes to the functionality and structure of CCFS as well as changes required to support the ROP-IWG process for CCM review of observer information and subsequent case creation.

Table 1. Summary of proposed CCFS changes

Source	Proposed change	Summary
US – previously supported by WCPFC22	Four technical enhancements	Notification for reflagged vessels; automated investigation timelines; improved messaging identifiers; and multiple initiating CCMs ²
US – additional proposals	Case naming and classification	Change “Observer initiated” to “Observer sourced” and “CCM initiated” to “Inspection sourced”; introduce four-part case identifiers; and revise/add new case subject codes ³
US – additional proposals	Case workflow	Introduce an additional case status, “Marked as CCM Completed”, and a 60-day period associated with New Cases for initiation of an investigation and provision of a progress report ⁴
ROP-IWG	CCM creation of observer-sourced cases	Enable the responsible ROP CCM and/or CCM responsible for reviewing observer information to provide relevant information for case creation following review/debriefing, rather than relying on the existing SPC-to-Secretariat transfer process ⁵
ROP-IWG	Information supporting review and pre-checks	Make relevant Commission-held information available to authorised CCM users to support review of observer information before determining whether case creation is warranted ⁶
ROP-IWG / system implementation	Case-creation interface and controls	Adapt existing CCFS/Inspections functionality to support CCM case creation, including vessel matching, duplicate-case checks, data-quality controls and identification of related cases

² [WCPFC22 Summary Report](#), paragraphs 633-642.

³ WCPFC-TCC22-2026-DP01 [Recommended Technical CCFS Enhancements to Further Streamline the Management of CCFS Cases](#)

⁴ US Delegation Paper WCPFC-TCC22-2025-DP01 [Recommended Technical CCFS Enhancements to Further Streamline the Management of CCFS Cases](#)

⁵ WCPFC-TCC22-2026-24B [Scope of Observer Monitoring for Potential Infringements in the Compliance Case File System](#)

⁶ ERandEMIWG9-2026-00 [Chair’s Summary Report](#)

Source	Proposed change	Summary
Potential future functionality	API access	Enable case creation from national case/file management systems

6. The additional United States proposals would require changes to existing CCFS case naming and identifiers. This includes moving from the current three-level nomenclature to a four-level nomenclature and changes to some existing case subjects.⁷ Examples are provided in the table below.

Table 2. Proposed nomenclature changes

Case type	Current Nomenclature	Proposed Nomenclature
Observer sourced	[CMM]-[Subject]-[ID]	[CCM]-[Source]-[Subject]-[ID]
Inspection sourced	[CMM]-[Subject]-[ID]	[CCM]-[Source-Type]-[Subject]-[ID]

7. Implementation of these changes for historical cases would be more complex, particularly for cases created before the 2023 CCFS upgrade where a single case could contain multiple obligations. Alternative approaches to historical case identifiers would be required and mapping cases with multiple obligations to the new format would impact the ease of implementation.

Implementation considerations

8. The ROP-IWG process-flow proposals would change the current process for creating CCFS cases from observer-sourced reporting. The Secretariat does not currently enter observer cases directly into CCFS, a semi-automated transfer process between SPC and the WCPFC Secretariat achieves this. Under the proposed approach, authorised CCM users would be able to review relevant observer information following debriefing and compliance-related quality review and, where appropriate, provide the information required for case creation and potentially create initial case files.
9. Existing functionality developed for CCFS and the Commission's Inspections system provides a basis for this approach. The Inspections system already enables authorised CCM users to enter an inspection event, identify potential infringements and upload supporting information, with individual but related case files created for identified obligations. Elements of the existing Secretariat case creation functions are also similar. This type of functionality could be adapted for observer-sourced and has been envisaged for other case types.
10. Some CCMs participating in the ROP-IWG have also proposed that information used for existing Secretariat pre-checks be made available to CCMs undertaking the initial review of observer

⁷ US proposals for changes to case file subjects - POL, SHK, CWS case types remain unchanged. Changes to existing case subjects and new case subjects are: change "FAI" (FAD set related infringements) to "FAD" (fishing on any type of instrumental buoys including FAD related buoys, and FAD obligations); change "OAI" (Observer Alleged Infringements) to "OBS" (Observer Obstruction); new "DNS" for driftnet related infringements; new "RAY" for mobulid related infringements; new "TUR" for sea turtle related infringements; new "BIR" for seabird related infringements; remove "PAI" (Pre-Notification case types).

information. This could include relevant notifications and other Commission-held information required to determine whether reported activity represents a potential infringement. Additional automated checks could also be incorporated into the case-creation process.

11. All the proposed changes outlined in this paper are considered technically feasible. Several elements are interrelated and could be more efficiently designed and implemented together rather than as separate amendments to CCFS.

Preliminary cost estimates

Table 3. Preliminary estimated development costs

Package	Preliminary estimate (US\$)	Implementation considerations
Four US technical enhancements previously supported by WCPFC22	\$11,000–\$13,000	Initial estimate based on implementation as standalone changes; up to 10 development days
Additional CCFS changes arising from US and ROP-IWG proposals	\$22,094	Final scope and development approach dependent on outcomes of TCC22 discussions (\$11,755 specific to process flow changes)
Total potential CCFS changes	\$33,100–\$35,100	Preliminary estimate; costs can be refined once proposals for Commission consideration are confirmed

12. The preliminary estimate for the four United States technical enhancements previously supported by WCPFC22 remains **US\$11,000–13,000**. The additional system changes associated with the further United States proposals and the ROP-IWG process-flow proposals are currently estimated at approximately **US\$22,094**, giving a total preliminary estimate of **US\$33,100–35,100**.
13. These estimates are based on current assumptions about the design and implementation approach. A more detailed breakdown can be prepared once TCC22 has clarified the package of changes to be put forward for consideration by WCPFC23. This would also allow implementation to take account of potential efficiencies from developing related CCFS changes together.

Recommendations

14. TCC22 is invited to:
 - a. **note** that the proposed technical changes to CCFS arising from the United States proposals and ROP-IWG work are considered technically feasible
 - b. **note** the preliminary estimated costs of US\$33,100–35,100 for implementation of the proposed changes currently under consideration; and
 - c. **note** that more detailed costs and implementation requirements can be developed once the proposals to be put forward for consideration by WCPFC23 have been confirmed.

