



TECHNICAL AND COMPLIANCE COMMITTEE

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**COMPARISON BETWEEN US AND SECRETARIAT ASSESSMENTS – WCPFC
RECORD OF FISHING VESSELS**

**WCPFC-TCC5-2009/DP-05
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U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Pacific Islands Regional Office
1601 Kapiolani Blvd., Suite 1110
Honolulu, Hawaii 96814-4700
(808) 944-2200 • Fax (808) 973-2941

September 1, 2009

Andrew Wright
Executive Director
Western and Central Pacific Fisheries Commission
PO Box 2356
Kolonia, Pohnpei State 96941
Federated States of Micronesia

Dear Mr. Wright: *Drew*

In a letter to William Gibbons-Fly dated April 16, 2009, you provided a gap-analysis of the United States' portion of the WCPFC Record of Fishing Vessels in which an assessment was performed of compliance by the United States with the information requirements of Conservation and Management Measure 2004-01 (in terms of the percent of U.S. vessels for which a given piece of required information had been provided). We have reviewed the findings, and for most of the required information fields, they agree with our own assessment. However, for a few information fields, our assessment is substantially different than yours, and for that reason, I would like to provide you with a copy of our assessment. The table in Attachment 1 shows the percentages in our assessment side-by-side with those in your April 16 analysis. The table is followed by notes that highlight the main differences between the two assessments and offer possible reasons for those differences. I would appreciate it if this information is made available to the Fifth Session of the Technical and Compliance Committee.

We have also taken this opportunity to meticulously compare the WCPFC Record of Fishing Vessels with the U.S. Record of Fishing Vessels – that is, we have examined every piece of information for every U.S. fishing vessel in each of the two Records. Attachment 2 describes how the comparison was performed, and for the more problematic information fields, describes what exactly were considered discrepancies and offers possible reasons for the discrepancies. Attachment 2 refers to electronic tables that I will have my staff send to you by email. The main table shows, for every cell for which there is a discrepancy between the WCPFC Record of Fishing Vessels and the U.S. Record of Fishing Vessels, the correct piece of information (i.e., the information from the U.S. Record of Fishing Vessels). The three tables can be used by the Secretariat to make appropriate corrections to the WCPFC Record of Fishing Vessels. You can see from the comparison that there are a remarkable number of discrepancies between the two Records. While some such errors might be inevitable in any database, the United States believes the accuracy of the WCPFC Record of Fishing Vessels can be greatly improved by requiring that members and cooperating non-members submit their vessel record information in a common, agreed-upon, electronic structure and format that would avoid the need for manual data entry by the Secretariat.



Finally, I would like to express the appreciation of the United States for the Secretariat's gap-analysis of the WCPFC Record of Fishing Vessels. We believe the Record of Fishing Vessels can be a very valuable tool for the Commission, but that value will only be realized when the Commission's members and cooperating non-members fully satisfy their responsibilities with respect to Conservation and Management Measure 2004-01. For our part, we recognize that we have not been able to provide all the required information for all the U.S. fishing vessels on the WCPFC Record of Fishing Vessels. We are working to provide all the required information as soon as possible.

If there are any questions or comments on this matter they can be forwarded to Tom Graham at 808-944-2219 or Tom.Graham@noaa.gov.

Sincerely,



William L. Robinson
Regional Administrator

Attachments

cc: William Gibbons-Fly, U.S. Department of State
Ufagafa Ray Tulafono, American Samoa Department of Marine and Wildlife Resources
Celestino O. Igisomar, CNMI Department of Lands and Resources
Carlotta A. Leon Guerrero, Guam Office of the Lieutenant Governor

Attachment 1. Comparison between the Secretariat’s and the U.S.’s assessments of U.S. compliance with the information requirements for the WCPFC Record of Fishing Vessels

The table below reflects the U.S. compliance, percentage-wise, with the vessel information requirements of CMM 2004-01. The table shows both the percentages calculated by the Secretariat (for the U.S. vessels on the Record as of April 15, 2009, as indicated in the April 16, 2009, letter from Andrew Wright to William Gibbons-Fly) and the percentages calculated by the United States (for the U.S. Record as of May 25, 2009). Note that agreement between the percentages in the two columns does not mean that the information in both versions of the Record of Fishing Vessels is the same; we have prepared separately a cell-by-cell comparison of the WCPFC Record of Fishing Vessels and the U.S. Record of Fishing Vessels (see Attachment 2).

Noted below out several particular fields where there are substantial differences between the Secretariat’s calculations and ours:

Name of master; nationality of master: The two assessments are quite different presumably because in the Secretariat’s assessment, these two fields are combined, while they are treated separately in the U.S. calculations.

Type of fishing methods: The large difference between the two assessments appears to be the result of the Secretariat making entries in this field in cases where the United States has not provided any information.

Valid time periods: The large difference between the two assessments appears to be the result of the Secretariat not entering most of the information provided by the United States.

Fishing status: The difference in the two assessments appears to be the result of a miscalculation. The Secretariat appears to have counted blank entries as non-compliance, but for this field, blank entries do not necessarily signify non-compliance, as not all vessels currently on the Record were on the Record in the previous year – in those cases, the appropriate entry is a blank.

Information Requirement	Secretariat calculation for U.S. vessels on the Record of Fishing Vessels (465 vessels; as of 15 Apr 09)	U.S. calculation for the U.S. Record of Fishing Vessels (469 vessels; as of 25 May 09)
CMM 2004-01	% in compliance	% in compliance
5(a)		
Name of fishing vessel	100%	100%
Registration No.	100%	100%
WIN	100%	100%
Previous names (if known)		
Port of registry	98%	98%

5(b)		
Name/Address of owner	100%	100%
5(c)		
Name of master	48%	93%
Nationality of master		0%
5(d)		
Previous flag (if any)		
5(e)		
IRCS	94%	93%
5(f)		
Vessel comm. types & nos.		
5(g)		
Color photo of vessel	33%	33%
5(h)		
Where vessel built	100%	99%
When vessel built		99%
5(i)		
Type of vessel	100%	100%
5(j)		
Normal crew complement	100%	100%
5(k)		
Type of fishing methods	100%	21%
5(l)		
Length	100%	100%
5(m)		
Moulded depth	100%	99%
5(n)		
Beam	100%	99%
5(o)		
GRT	99%	99%
5(p)		
Power of main engine	80%	84%
5(q)		
Carrying capacity	1%	1%
Freezer type		
Fish hold capacity	1%	1%
5(r)		
Form of FS auth	100%	100%
Auth number	100%	100%
Specific areas auth	100%	100%
Species auth	99%	100%
Valid time periods	41%	100%
Fishing status	91%	100%
Measure of consistency with requirement (as a %)	74%	82%

Attachment 2. Comparison of the U.S. Record of Fishing Vessels and the WCPFC Record of Fishing Vessels

The United States performed a detailed comparison of the U.S. Record of Fishing Vessels (current as of the U.S. submission to the Secretariat dated April 15, 2009) and the WCPFC Record of Fishing Vessels (downloaded in CSV format from the WCPFC website May 25, 2009, which should reflect the April 15, 2009, version of the U.S. Record).

All the substantive inconsistencies between the two Records are shown in three MS Access tables, which are provided separately in electronic format:

Missing_Vessels_(25 May 2009)
Extra_Vessels_(25 May 2009)
Discrepancies_(25 May 2009)

Missing_Vessels_(25 May 2009) includes all the information for the single vessel that is missing from the WCPFC Record.

Extra_Vessels_(25 May 2009) indicates the single vessel that is included in the WCPFC Record but which should not be included.

It should be noted that since May 25, 2009, the U.S. Record has been updated a number of times, and those updates have been submitted to the Secretariat. Therefore, some of the discrepancies identified here may already have been corrected. Furthermore, if these tables are used to correct the WCPFC Record, all the U.S. submissions since May 25, 2009, would have to be re-incorporated into the WCPFC Record, as appropriate.

The table Discrepancies_(25 May 2009) includes all the vessels included on both Records that had at least one discrepancy. All 468 vessels common to both Records had at least one discrepancy and all 468 records are therefore included in the table. The table has entries only for those cells for which the WCPFC Record does not match the U.S. Record. The correct entry, taken from the U.S. Record, is entered in the table. It is important to note that in the U.S. Record, a blank cell simply indicates that no information has been provided – it does not distinguish “none” from “unknown”. The United States intends to improve its Record in order to make that distinction.

For most information fields, the method of comparison was straightforward: if the respective entries in a given cell did not match exactly (including punctuation), it was considered a discrepancy and the correct information was entered into the table. However, because the WCPFC Record is not structurally identical to the U.S. Record, making comparisons for some fields was not straightforward. Those fields are identified below, along with a description of how discrepancies were identified.

Previous names (if known)

In cases of multiple previous vessel names, the order of entry of the vessel names in the WCPFC Record was often different than in the U.S. Record. We did not identify those cases as discrepancies, but those non-substantive differences might be symptomatic of broader problems in the WCPFC Record, and we believe that achieving exact matches between the two Records is a reasonable standard. We highlight that in the WCPFC Record, this field includes many entries of “none” or “unknown,” while the U.S. Record does not (again we intend to improve the U.S. Record to distinguish between “none” and “unknown”, and for this field, the distinction is especially important).

Name of owner

In the WCPFC Record, the U.S. Record fields *Corporate name*, *Vessel owner’s last name*, and *Vessel Owner’s first name* are combined into a single field, *Owner*. In cases of individual owners, we found that the WCPFC Record usually combines the U.S. Record fields as follows: *Vessel owner’s last name*, *Vessel Owner’s first name* (for example: SMITH, JOHN). Accordingly, we identified as a discrepancy any entry in *Owner* that did not follow that convention, regardless of whether there were substantive discrepancies in either the first or last names individually. In cases of corporate owners, any difference at all between the two entries was considered a discrepancy.

Address of owner

In the WCPFC Record, the U.S. Record fields *Vessel owner’s address*, *Vessel owner’s city*, *Vessel owner’s state*, *Vessel owner’s zip*, and *Vessel owner’s country* are combined into a single field, *Address*. However, we could not identify a usual pattern for combining these fields. Instead of identifying every deviation from the usual combination pattern (which did not appear to exist) as a discrepancy, we identified as discrepancies only those entries for which at least one element differed substantively (this included, for example, cases where *Vessel owner’s state* was spelled-out in one Record and abbreviated in the other). Beyond correcting the identified discrepancies, we urge the Secretariat to adopt and apply a consistent method of combining the address fields of the U.S. Record.

Name of master

In the WCPFC Record, the U.S. Record fields *Master’s last name* and *Master’s first name* are combined into a single field, *Master name*. We found that the WCPFC Record usually combined the U.S. Record fields as follows: *Master’s last name*, *Master’s first name* (for example: SMITH, JOHN). Accordingly, we identified as a discrepancy any entry in *Master name* that did not follow that convention, regardless of whether there were substantive discrepancies in either the first or last names individually.

Nationality of master

The WCPFC Record included many entries that state “unknown” while the entry in the U.S. Record was blank. Although all these cases were identified as discrepancies, they were not, of course, substantive ones, and again, we intend to improve the U.S. Record to distinguish between “none” and “unknown.”

Color photograph of the vessel

We compared only the photo files names, ignoring the directory path included in the WCPFC Record. The WCPFC Record included many entries of “not available” or “not provided” while the entry in the U.S. Record was blank. All these cases were identified as discrepancies, but they were not, of course, substantive ones. We also recognize that the Secretariat may have edited some photos and consequently changed their file names.

Type of vessel

The WCPFC Record does not appear to include any field for type of vessel, but the U.S. Record has an entry in its field *Vessel type* for every vessel. Accordingly, we identified discrepancies for every vessel in the Record.

Types of fishing methods

For most, if not all vessels, the WCPFC Record appears to take the information from the U.S. Record field *Vessel type* and insert it in the WCPFC Record field *Fishing method*. The United States, in contrast, considers vessel type and fishing methods to mean different things, and the U.S. Record includes the field *Types of fishing methods* in addition to *Vessel type*, consistent with the requirements of CMM 2004-01. Consequently, we have identified discrepancies for every vessel in the Record.

Vessel length

The WCPFC Record shows some vessel lengths in feet, as in the U.S. Record, while for other vessels the lengths have been converted to meters. However, the CSV version of the WCPFC Record does not indicate the units, and although the web version does, we see there are some errors in the units. We have identified any difference in the vessel length field, regardless of the units used, as a discrepancy.

Power of main engine(s)

We have identified only two vessels for which the numerical indicator of engine power in the WCPFC Record did not match those in the U.S. Record. However, we note that the WCPFC Record includes a separate field for units, the entries for which are incorrect for 14 vessels (all the entries in the U.S. Record are in horsepower, as indicated in the field name; these 14 cases have not been identified as discrepancies).

Freezer type

The WCPFC does not appear to include a field for freezer type. The U.S. Record, in contrast, includes the field *Types of freezers*, which has entries for most vessels. Accordingly, we have identified discrepancies for most vessels in the Record.

Valid time periods for fishing authorization

In the WCPFC Record, the U.S. Record fields *Start of period of validity* and *End of period of validity* are combined into a single field, *Vessel authorization period*. We found that the WCPFC Record usually combined the U.S. Record fields as follows: *Start of period of validity - End of period of validity* (for example: 15 Feb. 2005 – 14 Feb. 2010 or Feb 15 2005 – Feb 14 2010). Accordingly, we identified as a discrepancy any entry in *Vessel authorization period* that did not follow that convention, regardless of whether

there were substantive discrepancies in either of the two elements individually. We highlight that in the U.S. Record, there are entries in these fields for every vessel. The WCPFC Record, in contrast, was lacking any entry at all for the majority of vessels.

Fishing status

Discrepancies were identified in this field in a straightforward manner. However, we highlight the fact that neither the web version nor CSV version of the WCPFC Record gives an indication of the time period to which *Fishing status* applies, which makes it difficult to interpret (the field might be better labeled “Fishing status in previous calendar year” or “Fishing status in 2008”, etc.).