



**COMMISSION
FIFTEENTH REGULAR SESSION**
Honolulu, Hawaii, USA
10 – 14 December 2018

**COMMENTS ON THE WORKING DRAFT TEXT FOR THE
COMPLIANCE MONITORING SCHEME**

**WCPFC15-2018-DP11_rev1¹
13 November 2018**

FFA Member CCMs

¹ This replaces the version issued on 13 November 2018, and provides the complete submission from FFA Members.



9 November 2018

Feleti P. Teo OBE
Executive Director
Western and Central Pacific Fisheries Commission
PO Box 2356, Kolonia
Federated States of Micronesia

Dear Feleti,

Comments on the Working Draft text for the Compliance Monitoring Scheme

I write on behalf of the 17 members of the Pacific Islands Forum Fisheries Agency in my capacity as the Chair of the Forum Fisheries Committee. The views expressed in this letter are without prejudice to the further development of positions and proposals by FFA members individually or collectively.

At the outset, FFA Members sincerely thank the Intersessional Working Group Chair Glen Joseph for his leadership in progressing the IWG's key task of developing a CMS measure for WCPFC15's consideration. We also thank all other IWG participants and CCMs for the constructive manner in which they participated in our recent discussions in Majuro.

FFA Members have consistently stated that we are fully supportive of a Compliance Monitoring Scheme. At the same time, it is fundamental that the Scheme is effective, efficient, procedurally fair and produces fair outcomes, as well as promote and improve compliance. In addition, the processes and tools which support the Scheme must recognise the special requirements of SIDS, which include streamlining such processes, strengthening capacity, and requiring a widely-consulted and well-informed 2013-06 SIDS impact assessment before a measure is adopted and used in the CMS.

FFA Members have extensively discussed key issues in the Working Draft text (rev.2) dated 2 October and provide specific comments in Attachment 1.

We ask that you please circulate this letter to all CCMs, and look forward to further discussions at the upcoming Commission meeting. In the meantime, any queries may be directed to the FFA Secretariat (manu.tupou-roosen@ffa.int or pamela.maru@ffa.int).

Yours sincerely

Tapaeru Herrmann, Chair

Forum Fisheries Committee

1. Preamble

We thank those CCMs that have commented on this paragraph, our alternative text is set out below:

"Noting the commitment of FFA members to implement zone-based management within their exclusive economic zones in accordance with international law including UNCLOS to ensure the sustainable management of fisheries, and to determine how to implement their WCPFC obligations in their national laws and enforce those laws".

2. CCM level assessments

FFA Members thank the US for its proposal regarding Flag State investigations received by the IWG on 16 October.

FFA Members remain committed to undertaking assessments at CCM level. Along this line, we continue to seek to remove the Investigation Status Report (ISR) which maintains vessel level assessments. We also continue to advocate CCMs' use of existing tools for vessel infringements, namely the online case file system, requests under Article 25(2) and the IUU List.

Enhancing the online case file system

FFA Members thank the US for the objective criteria provided for the ISR, which is an improvement on the criteria adopted at WCPFC14. In our view, this could be used instead to enhance the online case file system which deals with vessel level infringements. The obvious advantage is to streamline and avoid duplicative work for flag States providing responses and progressing cases in the online system and concurrently populating ISRs; thereby making it less burdensome particularly for SIDS. FFA members believe this to be a more efficient means to achieve the objectives we share with the US and other CCMs in ensuring the CMS is effective and better integrated with the Commission's broader MCS framework.

FFA Members believe that the focus should be on how to enhance the online system and what information can be drawn from it to facilitate the work of CCMs and TCC. In addition, noting the critical role that the online system plays in the CMS process, it would be appropriate to recognise this in the measure by adding the suggested text:

"The Secretariat shall maintain the WCPFC online compliance case file system as a secure, searchable system to store, manage and make available information to assist CCMs with tracking alleged violations by their flagged vessels.

A flag CCM shall provide updates into the online system on the progress of investigation until its conclusion.

CCMs that are relevant to a case shall be allowed to view those cases for vessels flying other flags. Relevant CCMs shall comprise the CCM that notified the case to the flag CCM, and where applicable, the coastal CCM, the ROP observer provider and the chartering CCM".

Consideration could also be given to including text to recognise that information drawn from the online case file system is non-public domain data (NPD). These provisions could be placed in the context of discussion of the NPD status of the draft and provisional compliance monitoring reports in paragraph 8.

Individual information to each CCM

To assist each CCM to progress their case in the online system, we believe it would be useful for the WCPFC Secretariat to provide each CCM with its own information of cases it is involved in as a flag State or where applicable coastal State, observer provider, chartering State. This could simply state the infringement ID and could serve as a trigger for these relevant CCMs to ensure that the 'dots are connected' to progress the case e.g. where a request is made to the observer provider, the date could be recorded as well as the date of that provider's response.

This is particularly important, given that there are no automated alerts when new cases are included in the online system. This individual CCM information is for the flag CCM's own use to commence or progress an investigation on the online system. Likewise, it can be used by other identified relevant States to input and assist with progressing the case. This will feed into what then gets provided as aggregated information to all CCMs.

Aggregated information to all CCMs

In our submission to the IWG dated 3 July 2018, FFA Members proposed aggregated information drawn from the online system of alleged vessel infringements against key obligations for each CCM (see paragraph 21 of the Working Draft_rev.2). The intent is to provide an indicator of areas where there are potential anomalies or systemic issues to which targeted assistance can be provided.

The WCPFC Secretariat provided this aggregated information to TCC14 on a trial basis.¹ FFA Members can already see great value in this information in identifying anomalies and that it will assist in identifying trends over time.

If agreeable to have these two pieces of information drawn from the online case file system – individual and aggregated – then paragraph 21 can be revised as follows:

“At the same time, the Executive Director shall draw from the online case file system and transmit to:

(i) each flag CCM, the infringement identification relating to alleged violations by its flagged vessels for that CCM's own use to commence or progress an investigation on the online system. Relevant CCMs shall also be provided this same information; and

(ii) all CCMs, aggregated vessel level information across all fleets. This will be used to provide an indicator of potential anomalies in the implementation of obligations by a CCM, with a view towards identifying challenges for that CCM and providing targeted assistance. This information shall be considered by TCC alongside the Draft Compliance Monitoring Report.”

FFA Members suggested a Quality Assurance Review (QAR) as a response to anomalies or systemic issues. Advantages of the QAR include the independent reviewers, incentivising good behaviour and ensuring CCMs have their 'house in order', and targeted assistance to help a CCM improve compliance. TCC could make the recommendation for a QAR to the Commission. If it was a desktop review, it may not be unduly expensive or intrusive. It would also need to be undertaken in close consultation with the relevant CCM. Consideration will need to be given to how reviewers are

¹ Trial Summary Tables of Flag CCM Responses to Alleged Infringements notified in the WCPFC online case file system dated 31 July 2018 in the secure side of the website.

selected. In the first instance before a QAR is triggered, TCC could make a request for that CCM to provide an explanation to the Commission and a plan on how it would work towards compliance.

The key question arising is what would be the thresholds that trigger a response. Is there a need for an independent review of the aggregated information or could sufficiently clear thresholds be set out for the WCPFC Secretariat to facilitate collation of anomalies or trends? More work will be required to determine what other steps could be taken and what the thresholds would be. This could be included under 'Future Work' to be completed in 2019.

3. Principles (para.3)

In calling for the review of the CMS, FFA Members have consistently underlined the need to ensure that the CMS is effective, efficient and that the process is fair and produces fair outcomes. FFA Members have also underlined that responses to non-compliance are a critical piece of the CMS to assist Members to improve compliance and address the 'root causes' of non-compliance, rather than punitive.

The use of the title 'Principles' in a CMM is not new. For example it has been used in the CMMs related to Tropical Tunas, Harvest Strategies, Regional Observer Programme, High Seas Boarding and Inspection and Seabirds. In this particular context with the CMS, the principles identified by the FFA Members have helped guide how we shaped this measure. In addition, given the experience in the past 8 years in how this is operationalised, there is a need to focus this work and any future reviews.

We also think that the sub-titles 'Effectiveness', 'Efficiency', 'Fairness' are useful in focusing what is required in the application of this measure, so we prefer to retain these.

Specific to paragraph 3(i), this CMS work is a key task of the TCC as set out in Article 14(1)(b), so we think that cross-referencing this article is more appropriate than Article 25.

Specific to paragraph 3(ii), for FFA Members, it is important to retain the term 'efficiency' as this is the crux of this point. It is not just a matter of identifying the duplicative reporting but more importantly to remove it. As such, we propose to combine "assist in identifying" as well as 'removing' duplicative reporting obligations. We also propose to include the "Commission" to include avoidance of burden or cost on Commission as a whole.

Specific to paragraph 3(iii), we agree with the edits as it strengthens the text.

Specific to paragraph 3(iv), if determined necessary to have a sub-title here as well, we could include 'Cooperation towards Compliance'. The only proposed change is to replace the text "responses to non-compliance" with the FFA text 'quality improvement and corrective action'. This picks up the further elements of the original FFA text which are key to this principle.

4. Recognition of sovereign rights (para.5)

We thank those that have commented on this paragraph, our alternative text is set out below:

"The CMS shall recognise and shall not prejudice the rights, jurisdiction and duties of all CCMs, including the sovereign rights of coastal States, to adopt and enforce its national laws or to take more stringent measures in accordance with its national laws, consistent with that CCM's international obligations".

5. Risk-based approach (para.6)

We are strongly encouraged by the support for the risk-based approach for consideration of obligations to be assessed. We have consistently stated that a challenge for the Commission is the shortfall in independent monitoring and verification of longline activities on the high seas, including transshipment. The resulting limited data in this fishery has meant that the CMS has heavily focused on the purse seine fishery.

Whilst we recognise that this is a high risk area for the Commission, we believe that this can be drawn out in the future task to develop a risk-based assessment framework, and therefore agree with Japan's proposal to delete sub-paragraph 3(iii).

6. Annual assessments (para.7)

Noting that breaching a quantitative limit such as a limit on fishing capacity, effort or catch, will undermine the objective of any measure, FFA Members agree to the US' proposed text in sub-paragraph 7(i).

In addition, FFA Members propose that we use the same list of obligations for assessment for this year as a starting point for determining at WCPFC15 what will be assessed in 2019.

7. Review process post-TCC (Section 7)

FFA Members note the concerns raised with the limited time between TCC and WCPFC for review, and the added workload for the Commission Chair. We view this as a less formal review process to provide an aggrieved CCM with the opportunity to be heard where it believes that the process applied at TCC has been unfair.

Going forward, assessments will be made at CCM level so there will not be the volume and level of vessel details as seen in the past. The future task of setting out audit points will also be very helpful in determining compliance ratings and should lessen the scope for what could be reviewed. In addition, disallowing additional information 30 days before Commission meetings and basing the review only on the information provided by the aggrieved CCM at TCC (not new information) will alleviate the workload.

Along these lines, FFA Members propose the following text:

“Where a CCM is of the view that its compliance assessment for a specific obligation at TCC was undertaken in a manner that has been procedurally unfair, that CCM may request a review of the process.

The request for a review shall be communicated to the Executive Director as a written submission not later than 7 days after the conclusion of the relevant TCC meeting. The Executive Director shall promptly forward the request to the reviewers.

The reviewers shall comprise the Chair of the Commission, the Vice-Chair and the Legal Advisor. The review shall be completed within 14 days after the reviewers' receipt of the requests (“review period”). The Commission Chair shall also seek a report on the matter from the TCC Chair.

If the CCM requests, the CCM shall also be given the opportunity to make oral submissions. Such oral submissions shall be made not later than 7 days after the commencement of the review period. Any related costs shall be borne by that CCM.

The outcome of the review shall be decided by a majority of the reviewers. If the reviewers find that TCC followed the process, a recommendation shall be made to the Commission to maintain TCC's recommendation. If the reviewers find that the process was not followed, the matter shall be suspended and returned to TCC for further consideration. The outcome of the review shall be communicated to the next annual session of the Commission. The Commission shall take the outcome into account in adopting the final Compliance Monitoring Report."

8. Future work

FFA Members agree to Japan's proposal to include a new sub- paragraph (v) on the participation of observers: "the development of the guideline for participation of observers in closed meetings of the Commission and its subsidiary bodies which consider the Compliance Monitoring Report". However, this work should be undertaken once other 'future work' elements are completed and incorporated in to the CMS.

In addition, in the development of the draft CMS measure, FFA measures identified a number of work areas that required dedicated resourcing and attention in order to implement some of the recommendations from the independent review, which the existing measure (CMM 2017-07) did not cater for nor could be implemented before a new measure is adopted at WCPFC15.

Section IX of the draft measure contains three key pieces of work to transform the Compliance Monitoring Scheme into a form that FFA members had envisaged, and to incorporate some of the elements suggested by the independent review panel. These are:

- i. a comprehensive review of all the Commission's reporting requirements, with recommendations to remove duplicative reporting as well as ensure the Commission's data and information needs are met;
- ii. the development of audit points to clarify the Commission obligations assessed under the CMS, as well as the development of a checklist to be used by the proponents of any proposal to include a list of potential audit points for the consideration of the Commission;
- iii. the development of a risk-based assessment framework to inform compliance assessments and ensure obligations are meeting the objectives of the Commission;

Reporting requirements have been developed on an adhoc basis, either resulting from an identified need, or as a result of negotiated measures and decisions. The review identified duplicative reporting as a problem, as such streamlining reporting requirements is needed.

There are several obligations that have not been assessed or continue to cause contention due to differences in interpretation. Comprehension of obligations and a clear understanding among all CCMs will be enhanced if each obligation had a clear set audit points to measure implementation.

The Commission has recognised that the workload of assessing all obligations is excessive, and have undertaken to prioritise and schedule assessments of obligations to rationalise the work of those involved in the CMS process. However, each year CCMs continue to add obligations to this list increasing the size of the list of obligations to be assessed, and related work. As such, a new risk based assessment framework was considered a useful approach to prioritise obligations to be assessed, and

to ensure that the implications of non-compliance against obligations were identified incorporated into CMS assessments.

As such FFA Members have developed terms of reference to provide guidance on advancing these three areas of work. Refer to Attachment 2.

9. Annex I - Compliance Status Table

As stated in our submission in July, FFA Members recognise the future work required to develop audit points. Therefore, in the interim, we also recognise that alternate text will be required.

Compliance Status ²	[Criteria in 2019] [Interim criteria]	Criteria [once the audit points are developed]	Response
Compliant	A CCM will be deemed Compliant with an obligation if the following criteria have all been met: a. reporting or submission deadlines; b. implementation of obligations through national laws or regulations; c. submission of all mandatory information or data required, in the agreed format, as applicable.	Compliance with the audit points	None
Non-Compliant	A CCM will be deemed Non-Compliant with an obligation if any of the following have occurred, as applicable: a. a CCM has failed to comply with an obligation not specifically identified as Priority Non-Compliant; b. information or data for the obligation has been submitted or reported in a way that is incomplete, incorrect, or wrongly formatted; or c. a CCM has failed to meet reporting or submission deadlines.	Failure to meet the audit points	Each CCM shall include, in its Part II Annual Report, any actions it has taken to address non-compliance identified in the Compliance Monitoring Report. Actions may include, one or more of the following: a. A CCM must address the issue to gain compliance by the next compliance assessment; or b. A CCM shall provide a Status Report to the Secretariat; or c. Other response as determined by the Commission.

² This annex applies to compliance statuses assigned for each individual obligation.

Compliance Status ²	[Criteria in 2019] [Interim criteria]	Criteria [once the audit points are developed]	Response
Priority Non-Compliant	A CCM will be deemed Priority Non-Compliant with an obligation if any of the following have occurred, as applicable: a. exceeded quantitative limit established by the Commission; b. failure to submit its Part 2 Annual Report; c. repeated non-compliance with an obligation for two or more consecutively assessed years; or d. any other non-compliance identified as Priority Non-Compliance by the Commission.	a. non-compliance with high-risk priority obligations and associated audit points b. repeated non-compliance with an obligation for two or more consecutively assessed years; or c. any other non-compliance identified as Priority Non-Compliant by the Commission.	Each CCM shall include, in its Part II Annual Report, any actions it has taken to address non-compliance identified in the Compliance Monitoring Report. Actions may include, one or more of the following: a. A CCM must address the issue to gain compliance by the next compliance assessment; b. Other response as determined by the Commission.
Capacity Assistance Needed	A SIDS or Participating Territory or Indonesia or the Philippines will be deemed Capacity Assistance Needed where they cannot meet an obligation and the following have occurred: a. that CCM has provided a Capacity Development Plan to the Secretariat with its dCMR prior to TCC; and b. TCC confirms that all the elements of paragraph 9 are included in that Plan.	When a SIDS or Participating Territory or Indonesia or the Philippines cannot meet an obligation that is being assessed due to a lack of capacity, that CCM shall provide a Capacity Development Plan to the Secretariat with the dCMR prior to TCC.	(i) The CCM shall complete the steps of the Capacity Development Plan for that obligation in order to become compliant with the obligation, and (ii) report progress against that plan every year in its Annual Report Part II until the end of the timeframe specified in that Plan.
CMM Review	There is a lack of clarity on the requirements of an obligation.	There is a lack of clarity on the requirements of an obligation.	The Commission shall review that obligation and clarify its requirements.

Title: Comprehensive review of WCPFC reporting requirements

Purpose: To improve and streamline the Commissions reporting requirements

The purpose of the review is to identify inefficiencies among existing reporting requirements. The independent review panel for the CMS identified that duplicative reporting within the existing reporting requirements created unnecessary administrative burdens and unfair compliance assessments for CCMs, in particular small fisheries administrations.

The [draft CMS CMM] contains future work calling for “a comprehensive review of all the Commission’s reporting requirements, with recommendations to remove duplicative reporting as well as ensure the Commission’s data and information needs are met”.

Tasking

The WCPFC Secretariat is best placed to undertake this work. The Secretariat has developed several tools to help CCMs to identify reporting requirements, such as the *suggested checklist of reporting requirements* and various templates that has been developed over time, and are well versed with supporting CCMs to ensure reporting obligations are met. This task is not expected to be a significant undertaking, and should be able to be delivered within the existing Secretariat resources.

Methodology

This task should include a holistic review of all reporting requirements, identified within the WCPF Convention, conservation and management measures, policies and procedures that the Commission has adopted, Commission decisions and any other source that may contain CCM reporting requirements.

It is noted that the Scientific Committee’s Project 93 includes an analysis of the Commission’s data needs, and should complement this work.

This work is expected to be carried out through a desktop study and consultation with relevant service providers, and should include:

- production of a comprehensive list of reporting requirements and a description of their data/information needs
- A comparison of all existing reporting requirements against their intended purpose or intent and whether this is met
- Identify whether the existing reporting form and format is sufficient or could be improved
- Identify inefficiencies, such as duplicative reporting, and recommend improvements
- Identify where support tools, such as templates or guidelines, and IMS enhancements (such as auto-population) could be developed to assist CCMs with meeting their reporting obligations
- Any other recommendations to support the objective of this and related work, as identified through this work.

Reporting

An initial report should be submitted to CCMs for their review by 30th June 2019. The initial report should be made available at least 1 month in advance of the Scientific Committee and Technical and Compliance Committee meetings in 2019 for their review.

Title: Compliance Monitoring Scheme - Audit Points

Purpose: To develop audit points for each Commission obligation to be assessed under the Compliance Monitoring Scheme.

The independent review for the CMS identified the need for agreed audit points to be developed. The current CMS uses some measure of audit points, however these have largely been based on Secretariat and CCM interpretation and discussion. There is a need to clearly identify and stipulate audit points for each obligation, to ensure all CCMs are aware and understand implementation and performance requirements against each obligation.

The [draft CMS CMM] contains future work calling for “the development of audit points to clarify the Commission obligations assessed under the CMS, as well as the development of a checklist to be used by the proponents of any proposal to include a list of potential audit points for the consideration of the Commission”.

Tasking

The WCPFC Secretariat has comprehensively developed compliance monitoring reports for the past eight years. This process makes them the most familiar with implementation requirements for each obligation, and places them as the most appropriate party to undertake this work.

However, the volume of obligations and the development of audit points will require dedicated resources within the Secretariat. As such a consultancy will be required to deliver the required outputs from this task.

Methodology

This task should include a collation of all WCPFC obligations identified within the Convention, conservation and management measures, adopted policies and procedures, Commission decisions and any other source that may contain CCM obligations.

This work is expected to be carried out through a desktop study and should include:

- Developing a comprehensive list of obligations, that can be updated annually as required;
- A clear description of each obligation
- Development of a draft set of audit points against each obligation, that should:
 - Identify the party or parties responsible for implementing an obligation,
 - An indication of the nature of the implementation method for each obligation i.e. administrative, legislative or policy, operational etc.
 - Specify measurable performance requirements and metrics
 - Any other information that clearly outlines expected CCM performance
- Identify where assessments of particular obligations might be rationalised through tools developed within the WCPFC information management system, e.g. validation rules applied in the submission of dCMR.
- Guidelines or requirements for proponents of any proposed CMM, or other Commission adopted instrument or decision, to develop audit points against each obligation contained therein.

Reporting

The final report should be submitted to CCMs at least 1 month in advance of the Scientific Committee and Technical and Compliance Committee meetings in 2019 for their review. The Commission may establish an intersessional working group to review the outcomes of this tasking, and provide advice

to the Commission. TCC should review this work, and provide advice on how to incorporate it in to the CMS.

Budget

Consultant fees [20 days]

Travel to [SC and] TCC

Title: Compliance Monitoring Scheme - Risk-based assessment framework

Purpose: To provide the Commission with a framework on which to determine the relative risk value and frequency of assessment of each WCPFC obligation adopted in accordance with Article 10 of the Convention. The framework should provide the Commission with a mechanism to determine relative risk values that informs the Commission of the consequence and implications that CCM non-compliance poses on achieving a particular management objective.

The [draft CMS CMM] contains future work calling for the development of a risk-based assessment framework to inform compliance assessments and ensure obligations are meeting the objectives of the Commission.

Tasking

A consultancy is required to develop a risk-based assessment framework to support TCC's work relating to the Compliance Monitoring Scheme. As this is a new approach that the Commission is undertaking, the consultant(s) will be expected to consult with the WCPFC Secretariat and relevant service providers, TCC and CCMs to ensure that CCMs are able to contribute to, and understand how the risk-based assessment framework will be applied.

To risk-based assessment framework should help to inform key work areas of the Compliance Monitoring Scheme, including:

- Obligations to be assessed by TCC in the Compliance Monitoring Scheme process,
- To assess the consequence and implications of CCM non-compliance against an obligation,
- Determine the severity of non-compliance against obligations, and
- Determine whether a CMM requires revision.

The risk based assessment approach should aid in rationalising the CMS process, and guide how the Commissions undertakes CMS assessments. As described in [paragraph 6 of the CMS], the risk framework focusses on the risk that non-compliance with an obligation poses to the Commission, not the simple risk of non-compliance with an obligation.

Methodology

The consultant(s) will be tasked with developing a framework that systematically outlines a process for undertaking risk-based assessments for prioritizing, and sharing information about the compliance risks and consequences of CCMs not meeting their WCPFC obligations. The framework should be fit for purpose, and user friendly. In developing this framework the following should be incorporated:

Development of risk assessment

- Development of criteria to assign WCPFC obligations with overall risk values. This includes the determination of likelihood and consequence settings of non-compliance against each WCPFC obligation.
- Taking into account the development of audit points for each obligation to inform risk assessment criteria.
- Consider obligations with audit points, such as obligations with quantifiable limits, that may incorporate efficiencies such as automated assessments for example, where validation rules may be developed for application within the WCPFC information management system
- Development of criteria to prioritise the assessment of obligations based on risk assessment outputs, including frequency of assessment.
- Taking into account technology that exists within the WCPFC Secretariat's capacity or that may be acquired, in order to undertake risk assessments.

Trialling of risk assessment

- Undertake a risk assessment to identify the likelihood of non-compliance occurring and consequences resulting from non-compliance against an obligation, for all existing WCPFC obligations. This may include input from all CCMs to determine the risk profiles of each obligation.

Processes to consider CCM assessments

- Consider the risk of individual obligations relative to a conservation and management measure as a whole, and to the achievement of Convention Objectives.
- Identify risk assessment outcomes where Commission responses may require a CMM review. [how to respond might be undertaken in the 'responses to non-compliance work']
- Develop a process for risk assessments to be undertaken when new CMMs, or obligations, are adopted by the Commission.

Support materials

- Develop awareness materials for CCMs on the methods that will be applied to develop the risk-based assessment framework, and any necessary inputs required of CCMs.
- Development of guidelines and templates to apply the risk-based assessment framework, where required.
- Any other considerations as identified through this work.

The development of a risk-based assessment framework should enable the Commission to identify and respond to compliance risk areas, particularly where persistent, systematic or high consequence non-compliance issues are identified.

Reporting

This work should incorporate outputs from the development of audit points, and therefore should commence once the subsidiary bodies have reviewed that work.

- Initial report – February 2020
- Incorporate CCM inputs, and provide to TCC16 for review
- Final report for WCPFC17 consideration

The consultant(s) should include any other recommendations for additional work as identified through this consultancy.

Cost

Consultancy - [20] days

Travel to TCC15, and time with W-Sec at HQ?

\$\$ USD