



## **TECHNICAL AND COMPLIANCE COMMITTEE**

### **8<sup>th</sup> Regular Session**

27 September - 3 October 2012

Pohnpei, Federated States of Micronesia

### **ROP - TAG REPORT TO TCC8**

**WCPFC-TCC8 -2012/14**

**23 September 2012**

#### **Introduction**

1. The first TAG circular was sent in early June 2012 to all participants listed in the TAG process; Table 1 shows issues previously raised by observer programmes or the ROP and includes the responses received from Countries/Coordinators on these issues along with some suggested recommendations.

2. The format used was to submit issues to everyone involved in the process, and then have participants make comments on a possible resolution to these issues, after considering the comments received; a proposed recommendation on the issue is given where possible. Recommendations suggested to be adopted by TCC for the issues raised are listed against the comments in Table 1. In most cases the wording of the recommendations is suggested by the TAG participants, however, where there were different suggestions in the response, a recommendation was compiled trying to take into account all the suggestions. It must be noted that not many comments were received on these issues and this is taken as an indication that participants would be agreeable to the outcomes.

The following recommendations 1-3 to TCC8 have been taken from Table 1 for convenience.

**TCC is invited to recommend rules where suggested for items 1-3 and to note item 4&5**

#### **1 Carrier vessels**

- a) **Carrier Vessel must carry independent of the flag state observers;**
- b) **Carrier observers must board the vessel at first point of embarkation of the vessel on its trip into the WCPFC Convention Area;**
- c) **Carrier vessel must inform the Commission Secretariat of the name of the observer and provider of the observer on board the carrier vessel; before departing the first point of embarkation;**
- d) **Data fields contained in the Observer Data Collection Forms FC-1 FC-2 FC-3 developed as guidelines for observers on carriers be included in the Minimum Data Field Standards of the Commissions and to be placed on the WCPFC Website; flag States may develop their own format using these fields for observer data collection or they may use the Commission developed forms FC-1, FC-2, & FC-3;**
- e) **Transshipment from long line, troll and pole and line fishing vessels in CCM national waters shall be in accordance with relevant domestic laws and procedures;**

- f) A carrier should carry an observer from an authorized observer provider and if required an observer nominated by the country in whose waters the carrier is transshipping; (*This may mean a carrier might be required to carry two observers*)
- g) All high seas transshipment data collected by observers will be sent to the Secretariat for entry into the ROP transshipment data base;

**2. Cross Endorsement of Observers**

- a) Observers from IATTC or WCPFC authorized observer programmes will be trained in both IATTC and WCPFC data collection and reporting formats.

**3. ROP Observers arriving in Foreign and or in Home ports;**

- a) All observers regardless of what ROP programme they are from must inform the observer provider of the country to which port they will disembark, at least 48h before the intended observer disembarkation.
- b) When informing the Observer Provider of the port State in which the observer will disembark, the following details should be provided in the notification:
  - i. Vessel name
  - ii. Name of observer
  - iii. Country of observer origin
  - iv. Provider for this observer trip i.e. National - FFA or SPC
  - v. Trip number
  - vi. Date of Arrival in port
  - vii. Whether trip is completed by the observer and he/she is disembarking and going home
  - viii. Whether trip is completed by the observer and he/she wishes to continue on another trip
  - ix. Whether the observer requires further workbooks or work materials
  - x. Any other type of assistance if required
- c) The list of observer provider contacts in each country must be made available to the observer prior to being placed on a vessel.

**4. Hybrid model-**

No recommendation - although it has been highlighted that there seems to be no actual document that describes fully the Hybrid Model used for the ROP.

**5. Exemption to transit without an Observer**

This matter is also covered in the ROP issues paper but was raised by the TAG in its May circular on issue to be dealt with; As it is being discussed elsewhere it remains in this report for the interest of members; the following was compiled from the responses received from members and are similar in meaning but are not exactly the same wording to those recommended in the ROP issues paper.

- a) Flag State of the vessel should give its permission to the vessel to depart without an observer; (certification shall be sent by the authority of the flag State to the vessel as a proof.)
- b) The relevant country authority/fisheries where the vessel is in port must be informed that the vessel intends to transit without a ROP observer on board in its EEZ.

- c) Vessels cannot depart for transit without a ROP observer, unless the Commission Secretariat is informed.
- d) Vessels exempted from carrying an observer are not permitted to fish at any time during the transit in any section of the Convention Area if there is no ROP observer present;
- e) Vessels exempted from carrying an observer must not service, deploy or replace FADs during the transit in the WCPFC Convention Area;
- f) Vessels must stow all fishing gear, cover its nets, etc. if transiting without observer;
- g) Vessels must ensure that booms are properly lowered and secured if no observer is on board.

Addition by EU

- h) FADs, fishing gear, booms, and fish hold hatches and brail hatches shall be sealed by the authorities of the port of departure. They shall issue notification to the Master of the vessel with copies to the fisheries authorities at the port of destination, to the WCPFC Secretariat and the flag State.
6. There are other TAG issues not covered in this paper these are being currently addressed and have been distributed to members for comments, and the TAG will create further recommendations to the TCC in 2013.

**Table 1 - Tag Issues 1-5**

Issue	Country	Country Comment	Proposed Recommendation
<p><b>1. <u>Hybrid Model</u></b></p> <p>The discussions would be based on the understanding that the Hybrid model is used in all ROP matters</p>	EU	[NB. If participants are to agree to this, we would need to have a common understanding of what "hybrid model" is i.e. definition or reference to document that clarifies what the hybrid model is]	<p>No Recommendation</p> <p>Note - There is no agreed WCPFC document that can be found that clearly outlines or defines the Hybrid model.</p>
	Chinese Taipei	This is not an operational issue	
<p><b>2. <u>Carrier Vessels</u></b></p>	EU	EU sees no issue here as carrier vessels should be treated the same way as any other vessel under the CMM on transshipment. Therefore we propose this section to be deleted. Alternatively if additional procedures are to be developed they should apply to all vessels transshipping at sea. Similarly, with regards to forms to be filled in, those should be the same for all transshipping vessels.	Noted
<p><b>2(a)</b> Independent of the flag of the vessel ROP observers must be placed on all carriers transshipping on the high seas.</p>	Chinese Taipei	Independent ROP observers must be placed on all carriers transshipping on the high seas.	<p>Recommendation</p> <p>a) all Carrier Vessel must carry independent observers;</p> <p>b) the independent observer must board the vessel at first point of embarkation of the vessel on its trip into the WCPFC Convention Area;</p>
<p><b>2(b).</b> The observer must board the vessel at the first point of embarkation of the vessel on its trip into the WCPFC Convention Area.</p>	Philippines	Agreed. This is the usual SOP in the deployment of Fisheries Observers as with regards to the embarkation on catcher vessels of longline or purse seine fishing vessels.	
	Chinese Taipei	Agree	

<p><b>2(c)</b> Carriers before departing must inform the Commission Secretariat of the name of the observer and provider of the observer on board the Carrier vessel.</p>	Philippines	Agreed.	<p>c) before departing the first point of embarkation the Carrier vessel must inform the Commission Secretariat of the name of the observer and provider of the observer on board the Carrier vessel;”</p>
	Chinese Taipei	Agree	
<p><b>2(d)</b> The observer must carry and fill out the WCPFC Guideline forms for transshipment FC1- FC2- FC3 formats as well as the FFA/SPC Gen1 - Gen 2 and Gen3 forms on the trip.</p>	Philippines	Agreed. Provided that the format of the form is feasible and have been approved by the Commission. Flag States can modify the form to suit the need of its national observer program as well	<p>d) data fields contained in the Observer Data Collection Forms FC-1 FC-2 FC-3 developed as guidelines for observers on carriers be included in the Minimum Data Field Standards of the Commissions and to be placed on the WCPFC Website; flag States may develop their own format using these fields for observer data collection or they may use the Commission developed forms FC-1, FC-2, &amp; FC-3.</p>
	Chinese Taipei	No comment yet -Forms provided for comment.	
<p><b>2(e).</b> The forms will be made available on the WCPFC Website for downloading</p>	Chinese Taipei	Agree	
<p><b>2(f)</b> Transshipment from long line, troll and pole and line fishing vessels in national waters shall be managed in accordance with relevant domestic laws and procedures, and where not indicated `the carrier should carry an observer from a WCPFC CCM</p>	Philippines	Philippines Fisheries Observer Program has observers for longline, purse seine and ringnet fisheries. However, having to deploy 2 observers onboard a carrier vessel will incur another cost for the vessel. The question is to whom will the payment for 2 <sup>nd</sup> observer be charged?	<p>e) Transshipment from long line, troll and pole and line fishing vessels in CCM national waters shall be in accordance with relevant domestic laws and procedures.</p>

<p>other than the flag State of the carrier, or if required an observer nominated by the country in whose waters the carrier is transshipping. This may mean a carrier might be required to carry two observers.</p>	<p>Chinese Taipei</p>	<p>Transshipment from long line, troll and pole and line fishing vessels in national waters shall be managed in accordance with relevant domestic laws and procedures, and where not indicated `the carrier should carry an observer from <u>an authorized observer provider</u> or if required an observer nominated by the country in whose waters the carrier is transshipping. This may mean a carrier might be required to carry two observers.</p>	<p>f) the carrier should carry an observer from an authorized observer provider and if required an observer nominated by the country in whose waters the carrier is transshipping. <i>(This could mean a carrier might be required to carry two observers.)</i></p>
<p><b>2(g)</b> Observer providers must send data collected on the high seas to the WCPFC Secretariat for data entry</p>	<p><u>EU</u></p>	<p>Observer providers must send data collected on the high seas to the WCPFC Secretariat for data entry</p>	<p>g) All high seas transshipment data collected by observers will be sent to the Secretariat for entry into the ROP transshipment data base.</p>
	<p>Philippines</p>	<p>There must be a dedicated website or email address which the data may be sent to ensure confidentiality. Also will the Providers be given access to the data inputted by the Commission?</p>	
	<p>Chinese Taipei</p>	<p>Our understanding is that all authorized providers shall provide the data collected to the Secretariat.</p>	
<p><b>3. <u>Exemption to travel without an Observer</u></b> <b>3.1</b> Purse seine vessels asking for exemptions to transit in the Convention Area without an observer.</p>	<p>Chinese Taipei</p>	<p>This procedure should be applied in the Convention area including high seas and EEZs. )</p>	<p>TCC agree that the following procedures should occur when a Purse seine vessels is not fishing and asks for exemptions to transit in the Convention Area without an observer;</p>
<p><b>3.2</b> Issues to be considered: should a vessel be obliged to carry an observer if only transiting to a shipyard; how could we ensure monitoring and control of the vessel if it would not carry an observer so that it does not engage in fishing or transshipment; refer also to issues identified in para 30 of</p>	<p>No comment received</p>		

WCPFC8-2011/24			
<b>3.3</b> A purse seine vessel wishing to transit from a recognized port under the scope of CMM 2007-01 and other relevant measures but not intending to carry an observer on board can do so only if the following occurs:	<u>Chinese Taipei</u>	What is the definition of recognized port?	
a) Flag State of the vessel should give its permission to the vessel to depart without an observer;	<u>EU</u>	Flag State of the vessel should give its permission to the vessel to depart without an observer;	a) Flag State of the vessel should give its permission to the vessel to depart without an observer; (certification shall be sent by the authority of the flag State to the vessel as a proof.)
	Philippines	Agreed. As long as a certification shall be sent by the authority of the Flag State to the vessel as a proof.	
	Chinese Taipei	Agree	
b) The relevant country authority where the vessel is to depart from gives permission for the vessel to transit without a ROP observer on board in its EEZ.	<u>EU</u>	The relevant country authority where the vessel is to depart from gives permission for the vessel to transit without a ROP observer on board in its EEZ. Vessels cannot depart for transit without such permission	b) The relevant country authority/fisheries where the vessel is in port must be informed that the vessel intends to transit without a ROP observer on board in its EEZ.
	Philippines	Agreed. As long as a certification shall be sent by the authority of the Flag State to the vessel as a proof.	

	Chinese Taipei	Agree	
c) Vessels cannot depart without a ROP observer, unless the Commission Secretariat is informed.	<u>EU</u>	Vessels cannot depart for transit without a ROP observer, unless the Commission Secretariat is informed.	c) Vessels cannot depart for transit without a ROP observer, unless the Commission Secretariat is informed.
	Philippines	Agreed. A proper notification from the Authority of the Flag State must be sent to the Secretariat of the Commission informing a vessel has no observer onboard. However, said vessel should be on transit and should not be fishing.	
	Chinese Taipei	Agree	
d) Vessels are not permitted to fish at any time during the transit in any section of the Convention Area if there is no ROP observer present;	<u>EU</u>	Vessels exempted from carrying an observer are not permitted to fish at any time during the transit in any section of the Convention Area if there is no ROP observer present;	d) Vessels exempted from carrying an observer are not permitted to fish at any time during the transit in any section of the Convention Area if there is no ROP observer present;
	Philippines	Agreed	
	Chinese Taipei	Agree	
e) Vessels must not service or place FADs at any time when there is no ROP observer onboard;	<u>EU</u>	Vessels exempted from carrying an observer must not service, deploy or replace FADs during the transit in the WCPFC Convention Area;	e) Vessels exempted from carrying an observer must not service, deploy or replace FADs during the transit in the WCPFC Convention Area;
	Philippines	Agree	
	Chinese Taipei	Agree	
f) Vessels must stows all fishing gear,	<u>EU</u>	Vessels must stow all fishing gear,	



covers its nets, etc. if no observer is on board		cover its nets, etc. if transiting without observer;	f) Vessels must stow all fishing gear, cover its nets, etc. if transiting without observer;
	Philippines	Agreed	
	Chinese Taipei	Agree	
a) Vessel must ensure that booms are properly lowered and secured if no observer is on board.	<u>EU</u>	Vessels must ensure that booms are properly lowered and secured if no observer is on board.	g) Vessels must ensure that booms are properly lowered and secured if no observer is on board.
	Philippines	Agreed	
	Chinese Taipei	Agreed	
b) Addition by EU	<u>EU</u>	FADs, fishing gear, booms, and fish hold hatches and brail hatches shall be sealed by the authorities of the port of departure. They shall issue notification to the Master of the vessel with copies to the fisheries authorities at the port of destination, to the WCPFC Secretariat and the flag State.	h) FADs, fishing gear, booms, and fish hold hatches and brail hatches shall be sealed by the authorities of the port of departure. They shall issue notification to the Master of the vessel with copies to the fisheries authorities at the port of destination, to the WCPFC Secretariat and the flag State.
<b>3(d) Question</b> - Do vessels need to be completely empty of all its catch when it departs (No fish are to be onboard if it wishes to transit without a ROP observer) e.g. Purse seine vessels transiting from a port inside the 20N -20S area, to ports outside of the 20N - 20S section of the WCPFC Convention Area and that have tuna on board must carry an ROP observer at all times.	EU	Proposed para above addresses this issue to prevent that catches are added to those that may already be on board as a result of fishing and/or transshipment.	i) No recommendation on this issue other than to note the EU suggestion if agreed above in 3.3(k) would alleviate any problems if a vessel has catch on board if it is transiting.
	Chinese Taipei	For CT not necessary.)	
<b>4. Operational rules for Cross Endorsement of Observers</b> 4 (a) Issues to be considered have been	<u>EU</u>	WCPFC Executive Director will continue to work with the IATTC Director to implement the deployment	a) Observers from IATTC or WCPFC authorized observer programmes will be been trained in both IATTC and

identified in paragraph 31 of WCPFC8-2011-24 and para 3-7 of WCPFC8-2011-35		of cross-endorsed observers as soon as possible.	WCPFC data collection and reporting formats.
	<u>EU</u>	Observers from IATTC or WCPFC authorized observer programmes will be trained in both IATTC and WCPFC data collection and reporting formats.	
	<u>EU</u>	Observers from IATTC trained in both IATTC and WCPFC data collection reporting formats will be considered WCPFC ROP observers.	
	<u>Chinese Taipei</u>	Approved observers from IATTC or WCPFC observer programmes that fish in the respective Convention Areas will be trained in both IATTC and WCPFC data collection and reporting formats	
5.			

<p><b>5. <u>Observers arriving in foreign and home ports</u></b></p> <ul style="list-style-type: none"> <li>i. Vessel name</li> <li>ii. Name of observer</li> <li>iii. Country of observer origin</li> <li>iv. Provider for this observer trip i.e. National - FFA or SPC</li> <li>v. Trip number</li> <li>vi. Date of Arrival in port</li> <li>vii. Whether trip is completed by the observer and he/she is disembarking and going home</li> <li>viii. Whether trip is completed by the observer and he/she is continuing on another trip</li> <li>ix. Whether the observer requires further workbooks or work materials</li> </ul> <p><b>5.1</b> All observers regardless of what programme they are from must inform the provider of observers in the country to which they have landed, either prior to landing or immediately on landing.</p> <p>a) Observers must inform the provider in the country to where they are landing</p>	<p><u>EU</u></p>	<p>All observers regardless of what programme they are from must inform the Observer provider of the port State in which they will be disembarked;</p> <p>When informing the Observer Provider of the port State in which the observer will be disembarked, the following details should be provided in the notification:</p> <ul style="list-style-type: none"> <li>i. Vessel name</li> <li>ii. Name of observer</li> <li>iii. Country of observer origin</li> <li>iv. Provider for this observer trip i.e. National – FFA or SPC</li> <li>v. Trip number</li> <li>vi. Date of Arrival in port</li> <li>vii. Whether trip is completed by the observer and he/she is disembarking and going home</li> <li>viii. Whether trip is completed by the observer and he/she is continuing on another trip</li> <li>ix. Whether the observer requires further workbooks or work materials</li> <li>x. Any other type of assistance if required</li> </ul> <p>This information shall be forwarded at least 48h before the observer is disembarked</p>	<p>Recommendation</p> <ul style="list-style-type: none"> <li>a) All observers regardless of what ROP programme they are from, must inform the observer provider of the port State where they will disembark at least 48h before the intended observer disembarkation.</li> <li>b) When informing the Observer Provider of the port State in which the observer will disembark, the following details should be provided in the notification: <ul style="list-style-type: none"> <li>i. Vessel name</li> <li>ii. Name of observer</li> <li>iii. Country of observer origin</li> <li>iv. Provider for this observer trip i.e. National - FFA or SPC</li> <li>v. Trip number</li> <li>vi. Date of Arrival in port</li> <li>vii. Whether trip is completed by the observer and he/she is disembarking and going home</li> <li>viii. Whether trip is completed by the observer and he/she is continuing on another trip</li> <li>ix. Whether the observer requires further workbooks or work materials</li> <li>x. Any other type of assistance if required</li> </ul> </li> </ul>
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<p>b) Observer providers in each country must be made available to the observers prior to being placed on vessels. (List is available on WCPFC Website)</p>		<p>The list of observer providers in each country must be made available to the observers prior to being placed on vessels. <i>(note these are currently listed on the WCPFC Website)</i></p>	<p>c) The list of observer provider contacts in each country must be made available to the observer prior to being placed on a vessel</p>
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Item for Discussion	Issue	Comment or Solution
1. Before an observer can board a vessel; should he/she should expect that the vessel has safety equipment on board available to the observer, and this vessel equipment is in good order and where required in current survey.	Observers and providers have reported that on a few longliners in their ports that after an inspection , safety equipment, life jackets, life rafts etc, has not been maintained, and is in some cases is over the use by date, or is out of survey.	
2. Identify solutions to streamline the process to proactively bring vessel safety up to the accepted vessel safety standards of the flag State of the vessel; prevent vessels deemed unsafe or not meeting these standards from departing without observers.	Providers have indicated that to allow vessel to stay this way may encourage them to remain this way as operationally it is not possible to place an observer on what is considered an unsafe vessel.	
3. Observer providers should implement the procedures and protocols in the WCPFC Transshipment Observer Format guidelines.	The Commission Secretariat has developed a set of forms FC-1 -FC-2 FC-3 as guides for observers to use on Carriers. These forms only guides.	
4. WCPFC Secretariat should get information from the ROP authorised programmes and make it available on the WCPFC Website this would help to identify people at appropriate locations, to facilitate and increase debriefs.	Operational information is not supplied on a regular basis to the Commission so as to maintain such a record.	
5. Continue to improve on standardizing the observer placement process, by developing draft materials that CCMs can use to outline, clearly, the observer and operator responsibilities.	The Annexes of CMM 2007-01 contain some responsibilities; however these are not complete for all operational matters.	
6. Develop clear and standard observer	There are no Current ID card protocols or	

<p>credentials, i.e., ID cards for Commission ROP observers.</p>	<p>guides for the development of a Regional Observer Programme ID card.</p>	
<p>7. Suggesting or Identifying mechanisms to prevent and stop misconduct of observers when on vessels or in port.</p>	<p>Ongoing problem that is usually dealt with by the provider of the observer through their Codes of Conduct.</p> <p>Operationally this issue has become a problem, mainly due to drunkenness, it causes problems to providers trying to make placements of the observer, especially when an observer is in another country and not from the programme of that country.</p>	
<p>8. Observer salary and allowances should be reviewed. The WCPFC should develop and recommend minimum standards for salary and allowance payments for observers.</p>	<p>Observers complain about the low standard of salaries paid compared to the work expected.</p>	
<p>9. A standardized mechanism for paying observers should be identified.</p>	<p>The mechanism for paying observers in some observer programmes is a problem, especially where vessels are asked to pay the observer direct, for salary, allowances and travel</p>	
<p>10. Identifying an exit/entry process for carrier vessels exiting or entering the region with the use of observers.</p>	<p>It is difficult to monitor 100% observer coverage of transshipments at sea if a carrier that enters the Convention area does not declare what their intention is.</p> <p>I.e. carriers can tranship in ports therefore not requiring an observer, or may have the intention to tranship on the high seas and therefore require an observer. The ROP has difficulty monitoring coverage unless the intention of carriers is known.</p>	

<p>10a Develop a format to report to the Commission Secretariat when Fish Carriers are entering or exiting the WCPFC Convention Area or are leaving a first port of embarkation inside the Convention area with the intention to tranship inside the Convention area.</p>	<p>There is no report format developed or operational reporting protocols to inform the Commission secretariat when transshipment vessels enter the Convention area and/or are leaving a port inside the Convention Area.</p>	
<p>11. Streamlining data transmissions between the regional observer programs and the Commission.</p> <p>11(a) Fix a time frame in sending all ROP data (Good or Bad) to SPC or WCPFC after the observer has returned from their trip/s</p>	<p>ROP data is not being received from some observer programmes in a timely manner; there is no standard operational procedure or protocols with time frames to send ROP data to the Commission.</p>	
<p>12. Accommodation for Female Observers</p>	<p>Problems have occurred with accommodation on some vessels, especially where female observers are asked to share accommodation with male crew members.</p>	
<p>13. Informing the Commission Secretariat (ROP) of observer's placements, to verify 100% purse seine and carrier coverage 5% is occurring.</p>	<p>Some flag States and providers do not supply regular observer placement information required by the Commission Secretariat to monitor coverage as stipulated in CMM 2007-01 Para 12 (a) iii</p>	

**Section 2**

<b>Operational rules for the transmission of observer reports to flag states and vessels</b>	<b>Issue</b>	<b>Comments or Suggestions</b>
1. The observer submits its preliminary report to the WCPFC Secretariat, the observer provider and the flag state within [1] month after the completion of the fishing trip.	The following has been agreed in adopting CMM 2007-01; however, there is no operational mechanism in place to allow this to occur.	
2. The preliminary observer report shall contain a list of non-compliance findings, if any, to be reported by the observer in the final report.	Recalling <b>CMM 2007-01 Attachment K, Annex B</b>	
3. Upon reception of this preliminary report and within 15 working days, the WCPFC Secretariat places the report on the secure portion of the WCPFC website for access by interested CCMs.	<b>Guidelines on the Rights and Responsibilities of Vessel Operators, Captain and Crew</b>	
4. The flag state sends this report to the Captain of the observed vessel within 15 working days of reception.	<b>1. The rights of vessel operators and captains shall include:</b>	
5. Within [1] month after reception of the report, the Captain of the observed vessel may review and comment on the preliminary observer report. These comments are sent to the flag state which then transmits them to the WCPFC Secretariat and the observer provider. They are also placed on the secure portion of the WCPFC website.	c) Timely notification from the observer provider on completion of the observer’s trip of any comments regarding the vessel operations. The captain shall have the Opportunity to review and comment on the observer’s report, and shall have the right to include additional information deemed relevant or a personal statement.	
6. Within [1] month of submission of the preliminary report by the Captain of the observed vessel, the observer submits its final report to the WCPFC Secretariat, the observer provider and the flag state.		



<p>It is placed on the secure portion of the WCPFC website.</p>		
<p>The Flag state of the vessel shall inform the WCPFC Secretariat and the observer provider of the corrective or punitive action taken against the vessel in cases of non-compliance reported in the final observer report.</p>		