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AVAILABLE DATA FOR VERIFYING COMPLIANCE IN THE COMPLIANCE MONITORING SCHEME

WCPFC-TCC21-2025-14

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Submitted by the Secretariat

Executive Summary

This paper provides an update on the Secretariat's approach to compliance verification within the Compliance Monitoring Scheme (CMS). Drawing on three years of applying adopted audit points in the preparation of the draft Compliance Monitoring Report (dCMR) and incorporating analytical work by consultancies, it reviews available data sources, the Secretariat's verification methods, and areas where limitations persist.

Part 1: Monitoring and verification of Tuna and Billfish CMM quantitative limits

Independent verification remains uneven. Purse seine fishing day limits in EEZs and high seas areas and the HSP1 catcher vessel limit continue to be supported by multiple data sources and are independently verified. By contrast, most vessel capacity limits, catch-based limits, and "actively fishing for" obligations rely heavily on CCM self-reporting, due to incomplete baselines, definitional ambiguities, and lack of vessel-specific data.

Part 2: Verifying obligations aimed at mitigating impacts of fishing

Compliance with obligations related to FAD management, shark measures, seabird and turtle mitigation, and prohibitions on plastics and driftnets is largely assessed against CCM implementation statements. Independent verification of CCMs implementation statements remains minimal. Persistent low and uneven longline observer coverage undermines confidence in bycatch and interaction estimates, and although coverage has recovered to pre-pandemic levels, further progress will require expanded human and electronic monitoring.

Part 3: Improving monitoring and verification of fishing activities, particularly in the high seas

Some improvements have been achieved through strengthened cross-checks of vessel data, fished/did not fish reporting, and VMS implementation. Scientific data submissions and observer coverage continue to be verified with SPC support. However, high seas transshipment reporting and daily catch and effort submissions remain only partially verified. The Secretariat has introduced automated tools to reconcile VMS and transshipment reporting, and these are expected to improve timeliness and independence of evaluations.

Looking forward, strengthening verification will require coordinated action to expand observer and electronic monitoring coverage, standardize scientific data submissions, develop catch documentation

schemes, and ensure provision of vessel-specific information linked to the Record of Fishing Vessels. Work currently underway through the FAD-MO IWG, ROP-IWG, and ERandEM IWG is expected to contribute significantly to improving the robustness of compliance verification.

TCC21 is invited to provide advice on approaches to strengthen verification processes and to guide the Secretariat on refinements or additional information that may be useful in future updates of this standing paper.

Purpose and Introduction

1. The purpose of this paper is to review the status of data that is currently available to support compliance reviews of individual obligations in the Compliance Monitoring Scheme (CMS), and the Secretariat's approach to evaluating compliance based on the available data. CCMs may find the Secretariat's Annual Reporting guidance provided in [WCPFC support helpdesk](#) a useful companion reference. This paper also presents the Secretariat's views on additional data sources that could strengthen WCPFC's ability to independently verify compliance with key obligations in the future.
2. This paper presents an update of the [TCC20 paper 25](#) which was first prepared by the Secretariat for TCC19 in 2023 in response to a task by the Commission.¹ In noting the value of the paper in guiding and enhancing the work of TCC and the Commission, as well as relevant intersessional working groups, TCC19 recommended that the Secretariat provide this paper as a standing paper and agenda item for TCC in the future.²

2025 Updates

3. Updates in this paper are drawn from three years of applying the adopted Audit Points when developing the draft Compliance Monitoring Report (dCMR). In addition, the past three years of experience gained through work undertaken by two analytical consultancies³ has provided valuable insight to inform the Secretariat's role in supporting compliance verification. Collectively, these areas of work have allowed for the opportunity to further consider where independent sources of information or data are not available to the Secretariat and where existing data sources are either not captured or not accessible in a form that is ready for use in assessments of individual obligations to support the preparation of the dCMR.
4. The update of this year's paper has also considered the TCC21 Provisional Agenda, which was developed in line with the TCC Workplan 2025 – 2027. The paper has been aligned to the order of discussions during TCC21 Agenda Item 7 *Information, Technical Advice and Recommendations relating to the Implementation of, and Compliance with CMMs*. The Annex reference summary tables have also been aligned to the TCC21 sub-Agenda Items.
5. **Annex 1 – 3** provides three reference summaries which document the Secretariat's approach to conducting compliance evaluations in the development of the dCMR, including the available data sources to inform those evaluations. Each table provides (from left to right) the most current version of the obligation with a brief description, the adopted Audit Point definition, the available sources of data for the dCMR, and a note related to the verification approach the Secretariat used in the dCMR prepared in 2025 (covering 2024 reporting year) or which was used for previous dCMRs prepared in

¹ WCPFC19 tasked the Secretariat to “develop a paper, which identifies those obligations for which there is a lack of independently verifiable data, as well as potential sources of data that could provide independent verification of those obligations, for review by TCC19.” (WCPFC19 Summary Report para 351(ii)).

² See paragraphs 222 and 223 of the [TCC19 Summary Report](#)

³ See [TCC19-2023-18](#) *Enhanced data analysis and interpretation: Experiences and Opportunities*

2024 and 2023. The presentation of the Annexes has also been aligned with the TCC21 Agenda Item subtopics:

6. Part 1 | Monitoring and verification of Tuna and Billfish CMM quantitative limits (TCC21 Agenda 7.3)

Annex 1: Information on current data sources and approach to verify compliance with Quantitative Limits (QL) in Tuna and Billfish CMMs and associated obligations

- 1.1 Tropical Tuna CMM – Purse Seine Fishery
- 1.2 Tropical Tuna CMM – Tropical Longline Fisheries
- 1.3 Tropical Tuna CMM - Other Commercial Fisheries
- 1.4 Albacore Tuna CMMs
- 1.5 Pacific Bluefin Tuna CMMs
- 1.6 Billfish CMMs

7. Part 2 | Verifying compliance with certain obligations and CMMs aimed at mitigating impacts of fishing (TCC21 Agenda 7.4, 7.7 and 7.8)

Annex 2: Information on current data sources and approach to verify compliance with obligations and CMMs aimed at mitigating impacts of fishing

- 2.1 FAD Management and Monitoring requirements
- 2.2 Sharks CMMs
- 2.3 Mitigation Impacts of Fishing, including on species of special interest

8. Part 3 | Improving the monitoring and verification of fishing activities, particularly in the high seas (TCC21 Agenda 7.5 and 7.9)

Annex 3: Information on current data sources and approach to verify fishing activities, particularly in the high seas

- 3.1 Transshipment activities
- 3.2 Operational Requirements for Fishing Vessels (RFV and VMS Requirements)
- 3.3 Observer related requirements
- 3.4 Catch and Effort Reporting related to fishing activities

Part 1: Monitoring and verification of Tuna and Billfish CMM quantitative limits

Highlights relevant to TCC21 Agenda 7.3

Evaluation approach: dCMR evaluations of tuna and billfish CMM limits in 2023–2025 are guided by adopted audit points. **Annex 1** highlights that the Secretariat’s ability to verify compliance depends on the type of limit and the available supporting data. In addition, different obligations require different verification approaches based on the available data and as guided by the audit points.

Use of Additional Data: Where possible, the Secretariat drew on multiple external and internal data sources to strengthen evaluations. For example, SPC annual catch and effort reports were used for evaluations of vessel days and some catch limits, while RFV, VMS, and FFA Good Standing data supported vessel limits.

Status of Independent Verification: Unchanged since 2023 and remains uneven across Tuna and Billfish CMMs and associated obligations.

- **Independently verified using data from multiple sources:** Purse seine fishing days (EEZ or high seas areas), HSP1 catcher vessel limit, and some catch-based purse seine fishery EEZ limits where *nil* activity occurred.
- **Partially verified:** Purse seine vessel limits, and implementation obligations preventing transfer of fishing effort to areas where days or vessel limits apply.
- **Evaluation based on self-reported information:** Catch-based purse seine fishery EEZ limits where *some* level of activity occurred, longline vessel limits, and various catch limit obligations.

Identified constraints: Ongoing difficulties related to interpretation of the term “actively fishing for” (and similar terms such as “directed at” and “targeting”) continue to present challenges, making it difficult for TCC to complete the assessments of some obligations during the CMR review. Due to current and historical monitoring limitations, there are some catch limits that have been prescribed in CMMs for which there is no baseline data to inform the determination of a limit. Consequently, it is not possible for the Secretariat to verify reports or confirm compliance with these limits.

Ways to improve the robustness of independent verification:

- For some fisheries where **greater coverage by observers or E-monitoring has already been achieved**, make the data available to WCPFC and/or Scientific Services provider in a form that can be readily used for cross-checking of fishing activities.
- To ensure greater verification of catch reporting, a **higher minimum ROP observer coverage rate** for longline fisheries should be established. This reflects the fact that thirteen years have passed since the 30 June 2012 deadline originally set under the ROP CMM.
- Further **streamline data flows for observer data** to WCPFC Secretariat to support more timely cross-checking and verification of catch and transshipment reporting.
- Where catch limits are being used, continue to progress work to **develop catch documentation**.
- Where vessel and “fishing for-type” limits are being used, additional individual **vessel-specific information** for each applicable CCM’s vessels that are authorized under each vessel limit is required.

9. Adopted Audit Points⁴ for limits are based on the following template language:

The CCM reported (where applicable in Annual Report Part 2 (AR Pt2)) its level of fishing effort / total number of vessels fishing for / total catch of {species} and the Secretariat can verify the CCM's reported effort/ number of vessels/catch level and confirm that the CCM's allowable limit has not been exceeded.

10. Consequently, where a quantitative limit obligation applies to a CCM, that CCM is expected to provide an annual report confirming that the applicable quantitative limit was not exceeded. Usually, this report will be submitted through the CCM's AR Pt2. The guidance provided by Audit Points confirms that the Secretariat is to first verify the report provided by each CCM and then confirm that the CCM has not exceeded the allowable limit.

11. The Commission has adopted several CMMs which prescribe limits on CCMs fishing activities. The limits can be specified in different ways:

- As a specified level of fishing effort (days, vessel numbers) that a CCM is permitted to undertake within the Convention Area or subparts thereof, and/or
- As a specified quantity of catch of a species or a stock that a CCM is permitted to catch; and/or
- As a specified limit on certain types of fishing activities, e.g. transshipment activities.

12. **Annex 1** presents a reference list of the current data sources and verification approaches used for Quantitative Limit obligations in tuna and billfish CMMs, and their relevant audit points. The quantitative limits related to transshipment activities and observer coverage are presented in **Annex 3** and discussed in Part 3 of this paper.

Limits on Purse seine fishing days

13. Most *purse seine effort limits* in the tropical tuna CMM are specified in terms of purse seine fishing days ([CMM 2023-01 24](#) and [CMM 2023-01 25](#)). In 2025, the approach used by the Secretariat in the dCMR to verify compliance with the applicable purse seine fishing days limits in 2024 was based on a report that SPC regularly compiles for WCPFC, which is based on operational catch and effort data that has been verified by SPC using VMS data and observer data (**Annex 1, Table 1.1**).

14. Additionally, it is useful to note that there is high confidence in the report that SPC regularly compiles for WCPFC because coverage of purse seine fishery operational catch and effort data is 100% for most purse seine fleets. With a 100% purse seine observer coverage requirement, there is high coverage of observer data for the purse seine fishery and VMS data through the Pacific VMS (WCPFC VMS + FFA VMS data combined) also has high coverage.⁵

⁴ [CMM 2023-04](#) paragraph 8 (i) states that through the Compliance Monitoring Scheme the annual assessment of compliance for limit obligations shall be determined based on the following criteria:

For a CCM-level quantitative limit or collective CCM quantitative limit, such as a limit on fishing capacity, fishing effort, or catch, verifiable data indicating that the limit has not been exceeded.

⁵ For specific levels of coverage see Table 10 in [SC21-ST-IP-02 Coverage Levels for Operational Data Fields Submitted to the WCPFC for purse seine operational catch and effort data](#), [WCPFC-TCC20-2024-09](#) and Table 4 in [SC21-ST-IP-05](#) for purse seine observer data coverage, and [TCC21-2025-RP01](#) for information about WCPFC VMS coverage.

15. In the list of limits presented in **Annex 1** there are five instances where purse seine fishery EEZ limits are solely defined as limits on catch.⁶ The Secretariat's verification approach uses a report that SPC prepares to check if there was some level or *nil* purse seine activity detected in the applicable year. However, where the data reflects some level of purse seine fishing activity, because suitable information was not available to the Secretariat when preparing the dCMR, the Secretariat approach in 2023 and 2024 was based on self-reported information provided by the CCM (see **Annex 1**). In the medium-term, it may be possible through the development of catch documentation schemes to collect additional data that will support analyses, and which will independently verify CCM-reported information in relation to compliance with purse seine catch limits.
16. For completeness, there is a single instance shown in **Annex 1** where the limit is defined in terms of both high seas purse seine days fished and catcher vessel numbers ([CMM 2023-01 25](#)). In 2024 and 2025, the Secretariat used the report that SPC prepares to verify the days fished part of the limit. For the catcher vessel limit, the Secretariat separately verified compliance with the vessel limit using analyses of WCPFC Vessel Monitoring System (VMS) data, Record of Fishing Vessels (RFV) data and High Seas Pocket 1 (HSP1) entry and exit reports.

Summary – Limits on Purse seine fishing days

17. The dCMR evaluations of obligations expressed as purse seine fishing days (whether applying to EEZ or high seas areas), were independently verified using data from multiple sources that were available to the Secretariat as a report prepared by SPC.
18. The dCMR evaluation of one CCM's purse-seine with a HSP1 catcher vessel limit was independently verified using data from multiple sources that were analyzed by the Secretariat.
19. For the catch-based purse seine fishery EEZ limits, some data was available to the Secretariat to verify some, but not all, CCM limits. The Secretariat could use data from multiple sources to verify compliance with EEZ limits where *nil* purse seine activity occurred (compliance with the limits was independently verified). However, where some level of purse seine activity did occur, the evaluation in the dCMR was based on self-reported information, so for now the evaluation is **not** independently verified.

Vessel limits

20. The tropical tuna CMM prescribes vessel limits that apply to purse seine fleets and longline fleets of certain CCMs, and these limits define the subset of the vessels to which the limit applies based on certain criteria. For example, the [CMM 2023-01 45](#) limit applies to longline vessels with freezing capacity targeting bigeye tuna, which are not operating under domestic quotas.
21. Through the dCMR process, there has been an opportunity for the relevant CCMs to notify WCPFC of the applicable vessel limits. The vessel number limits for most CCMs have been published through the [CMM page](#) on the WCPFC website. These are provided as numbers, and, currently, the Secretariat does not receive a reference list of the vessels included in the baseline from flag CCMs. Nor does the Secretariat receive in the report from flag CCMs, the list of the vessels that the flag CCM considers to be currently covered by the scope of the relevant vessel capacity limit at any point in time. In the absence of such vessel-specific data, the approach used in recent dCMR evaluations compares the CCMs self-reported information submitted in their AR Pt2. For example, the reported total number

⁶ Based on CMM 2023-01 Table Att 1 Table 1: Australia, French Polynesia, Indonesia, New Caledonia, New Zealand

of vessels that were active is compared to the total number of vessels derived from analyses using available RFV and VMS data (see **Annex 1, Table 1.1** and **Table 1.2**).

22. For the evaluation of the purse seine capacity limits ([CMM 2023-01 43](#)), the FFA Good Standing register data is also used to cross-check the RFV and VMS information. Although the comparison is still at the level of comparing total numbers of flagged vessels per CCM, there is slightly higher confidence in this evaluation of CCM-reported information with the Audit Point.
23. However, for the evaluation of longline vessel limits ([CMM 2023-01 45](#) and [CMM 2023-01 46](#)), the data currently available to the Secretariat is only based on vessel type data from the RFV. This means the analyses used in the dCMR are not precise enough to relate to the prescribed limit, and consequently the Secretariat approach relies on self-reported information provided by the CCM (see **Annex 1 Table 1.2**).
24. The Secretariat considers that the level of verification of all vessel limits would be strengthened if relevant CCMs were to notify WCPFC of key information to assist in clearly identifying the individual vessels on the RFV that are authorized to operate under a CCM's applicable vessel-based capacity limits. Such updates could be made through the RFV. Compiling this information would provide a point of reference for the Secretariat to undertake analyses that cross-check VMS records and other data sources about the activities of the relevant vessels. This would improve the level of verification that could be undertaken in future dCMR evaluations of vessel limits.
25. At TCC19 (2023), some CCMs suggested that WCPFC20 consider adding a data field to the RFV to allow a CCM to report via the RFV whether vessel limits (CMM 2021-01 42, 43, 44 and 45) apply to a vessel, in order to support the Secretariat's ability to independently verify compliance with capacity limit obligations⁷. However, there was no decision taken by the Commission at WCPFC20 on this suggestion. To support the dCMR evaluations, the Secretariat currently requests clarification from those CCMs subject to purse-seine and longline capacity limits.

Summary – Vessel Limits

26. The evaluation of most vessel limit obligations compared the CCM's self-reported information in their AR Pt2 to analyses using available RFV and VMS data.
27. Due to current data limitations, the evaluations in the 2025 dCMR of longline vessels capacity limit obligations were **not** independently verified, and the purse seine vessel limit obligations were partially verified using FFA Good Standing data.
28. Since vessel limits are likely to remain an element of WCPFC's ongoing fisheries management tools, additional individual vessel-specific information about each applicable CCM's vessels that are authorized to operate under each applicable vessel limit is required to strengthen the level of verification for future dCMR evaluations. It will also be important for this information to be provided in a form that the Secretariat can use to link to the RFV, because this will ensure this additional data source can be used to cross-check with other WCPFC data sources.

[“Vessels fishing for” type limits](#)

29. The Commission has previously noted the ongoing difficulties related to interpretation of the term “actively fishing for” (and similar terms such as “directed at” and “targeting”). This continues to present challenges and makes it difficult for TCC to complete CMR assessments for some obligations.

⁷ See paragraphs 213 and 214 of the TCC19 Summary Report. [<https://meetings.wcpfc.int/node/21722>]

Annex 1 provides a list of six limit obligations which fall into this grouping. Five obligations are the “fishing for vessel limits” in the south-west striped marlin CMM ([CMM 2006-04 01](#)), swordfish CMM ([CMM 2009-03 01](#)), south Pacific albacore CMM ([CMM 2015-02 01](#)), and “effort based limits for vessels fishing for” in the north Pacific albacore CMM ([CMM 2019-03 02](#)) and pacific bluefin tuna CMM ([CMM 2023-02 02](#)). Another recent obligation is an “effort-based limit for vessels taking” in the north Pacific swordfish CMM ([CMM 2023-03 02](#)).

30. The Commission also previously noted that the disparities in available operational-level data for determined baseline periods raised difficulties in undertaking compliance assessments as this results in some limits being based on analysis of operational-level data and other limits being based on self-reporting.⁸ To support TCC CMR assessments, the dCMR process has encouraged that relevant CCMs notify their applicable vessel limits, and these often self-notified limits are published through the CMM page on the website.⁹
31. The approach used by the Secretariat for dCMR evaluations of “fishing-for” limits compares the CCM’s self-reported information in AR Pt2 to the WCPFC Annual Catch and Effort Estimates (commonly abbreviated as ACE tables data) which are published summaries prepared by SPC, in their capacity as WCPFC’s Scientific Data Manager.¹⁰ The ACE Tables data are based on CCM’s scientific data submissions, however, there is a limitation because the ACE table summaries provide information about the levels of longline activity that were reported in the area where the limit applies. The information in these reports is not targeted only to the vessels that each flag CCM considers to be “fishing for” or “actively fishing for” and subject to the relevant CMM limit. This means the information used in the dCMR is not precise enough to relate to the prescribed limit, and consequently the Secretariat approach in the dCMR evaluation is based mostly on self-reported information provided by the CCM (see **Annex 1, Table 1.4, Table 1.5 and Table 1.6**).
32. Since 2024, the Secretariat’s dCMR evaluation of the limit obligation in paragraph 01 of [CMM 2015-02 01](#) is now based on the Commission-agreed definition of “actively fishing for”, which was adopted at WCPFC20 and defined as follows:¹¹.

“Vessels fishing south of 20 degrees South with an annual catch of albacore in that area with South Pacific albacore greater than 50% of the catch of potential target tuna (albacore, yellowfin, bigeye, southern bluefin), skipjack and swordfish.”

If the experience of TCC review of the dCMR for the [CMM 2015-02 01](#) limit obligation is positive, a similar approach could be considered for the other “fishing for” and “fishing effort” type limits.

Summary - “Vessels fishing for” type limits

33. The Commission has previously noted the ongoing difficulties related to interpretation of the term “actively fishing for” (and similar terms such as “directed at” and “targeting”) which continue to present challenges and makes it difficult for TCC to complete the assessments of some obligations during the CMR review. This issue remains unresolved by the Commission.

⁸ WCPFC18 Summary Report, Final CMR Executive Summary

⁹ In early 2023, the Secretariat released an enhanced CMM page that includes Audit Points and Limits (<https://cmm.wcpfc.int/>)

¹⁰ <https://www.wcpfc.int/ace-by-fleet> this link also explains the agreed process that supports the consideration of the updates that CCMs may provide throughout the year of their scientific data submissions to also be considered in subsequent iterations of the ACE tables.

¹¹ See paragraph 289 of the WCPFC20 Summary Report_Rev01.

34. If longline fishing activity-based limits continue to be used in CMMs, in the short-term and until higher and representative levels of independent verification of longline catch or effort limits are achieved, additional information that will support the Secretariat's ability to identify the individual vessels operating under each CCMs applicable CMM limit should be considered to improve the level of verification that can be undertaken in preparing future dCMR evaluations of these types of limit obligations.
35. Noting the experience of applying the agreed definition for the [CMM 2015-02 01](#) limit obligation, TCC should consider if this would be useful for dCMR evaluations of the other "fishing for" and "fishing effort" type limits (listed in **Annex 1, Table 1.6**).

Catch limits

36. **Annex 1, Table 1.2, Table 1.3 and Table 1.6** provides a list of species or stock-based catch limits that apply in some WCPO longline fisheries. There are catch limits applying to most CCMs for South-west swordfish in the area South of 20°S ([CMM 2009-03 02](#)), for North Pacific striped marlin fisheries North of the equator ([CMM 2010-01 05](#)), for bigeye caught in longline fisheries ([CMM 2023-01 38](#) and [CMM 2023-01 41](#)), for other commercial fisheries for bigeye, yellowfin and skipjack ([CMM 2023-01 48](#)), and for fisheries for Pacific bluefin tuna ([CMM 2023-02 03](#) and [04](#)). The approach used by the Secretariat in recent dCMR evaluations compares the CCM's self-reported information in AR Pt2, including in the relevant CMM required reports, to the ACE tables data which are published summaries based on CCM's scientific data submissions (see **Annex 1**).
37. Recalling the limitations in the use of ACE table summaries that have been referenced earlier in this paper, the Secretariat's evaluation in the dCMRs of compliance with these limits will continue to be based almost entirely on self-reported information provided by the CCM until the levels of independent monitoring are improved significantly, through increased observer coverage or implementation of E-monitoring, or a combination of the two.
38. The limit in the tropical tuna CMM for other commercial fisheries for bigeye, yellowfin, and skipjack ([CMM 2023-01 48](#)) was not included in the list of obligations to be evaluated recently. The Commission has previously noted some issues with the baselines for some CCMs fisheries, and the relevant monitoring programmes for these same fisheries are also limited. For certain CCM's other commercial fisheries within the scope of the tropical tuna CMM, there are continuing issues with verifying compliance with these catch limits.

Summary – Catch limits

39. Due to current data limitations, the evaluations in the dCMR of various catch limit obligations are **not** independently verified.
40. Due to current and historical monitoring limitations, there are some catch limits that have been prescribed in CMMs for which there is no baseline data to inform the determination of a limit. Consequently, it is not possible for the Secretariat to verify reports or confirm compliance with these limits.

[Implementation obligations preventing transfer of fishing effort to areas where days or vessel limits apply](#)

41. Certain tuna and billfish CMMs with effort-based limits applying to a certain geographical area, also include an obligation for CCMs to not shift their effort to areas where effort limits do not apply. In the tropical tuna CMM, purse seine effort limits apply to the area between 20N and 20S, so [CMM 2023-01 26](#) states that CCMs shall not transfer or expand purse seine fishing effort north of 20N or south of 20S. The swordfish CMM applies an effort limit to the Convention Area south of 20S, so [CMM 2009-03 03](#)) states that CCMs shall not shift their fishing effort for swordfish to the area north of 20S.
42. The approach used by the Secretariat in recent dCMR evaluations has considered ACE Table data for the current reporting year as the basis for verifying compliance. This is in part because the audit point tasks the Secretariat to both review statements of implementation, and to “verify some level of activity by the CCM’s flagged vessels”. However, the Secretariat has identified that the verification approach could be improved by expanding the review period in the report received from SPC based on ACE tables, because this would provide a better evaluation of any shift of fishing effort over time (**Annex 1, Table 1.1 and Table 1.6**).

Summary - Implementation obligations preventing transfer of fishing effort to areas where days or vessel limits apply

43. The evaluations in the dCMR of implementation obligations intended to prevent transfer of fishing effort were partially verified.

[Improving the robustness of verification of limits in tuna and billfish CMMs](#)

44. The Commission at WCPFC20 tasked TCC to consider whether any adopted audit points for Quantitative Limit obligations require additional verification sources or processes to better facilitate compliance assessments.¹² This section of the paper sets out some key points for TCC consideration.
45. Standardize data reporting mechanisms for annual catch and effort estimate data: An SC21 paper¹³ by the WCPFC Scientific Services Provider, SPC-OFP (SSP) proposed streamlining and standardizing data submissions to improve timeliness, as inconsistent formats currently cause delays, require extra interpretation and correspondence, and risk errors from manual entry and re-formatting (e.g., dates and times, species codes, conversion between weight units, etc.). The issues potentially jeopardize the timely availability of data needed by the Commission for both for scientific analyses and compliance processes, including dCMR evaluations. The paper recommended developing standardized data submission templates to improve the efficiency of processing annual scientific data submissions. In parallel, the SPC-OFP (as SSP) advised SC21 that it is also exploring more advanced systems to further improve submission, review, and reporting processes.
46. The outcome from SC21 was *“SC21 supported the development of a standardized data reporting mechanism by the SSP to enhance the efficiency of processing required data submissions under the SciData guidelines. SC21 encouraged CCMs to work with the SSP as it prepares revised templates for consideration at TCC21.”* (ref: SC21 Outcomes paragraph 5)

¹² See paragraph 754(f) of the WCPFC20 Summary Report_Rev01.

¹³ *Proposed data standardization approaches for improve efficiency* ([SC21-ST-WP03](#), dated 30 July 2025) – prepared by SPC-OFP.

47. Set higher target coverage level of minimum ROP observer coverage for all fisheries: Thirteen years have passed since the target date of 30 June 2012 to achieve 5% minimum ROP coverage rate requirement set out in the ROP CMM.¹⁴ It is timely for the Commission to consider establishing a new higher target level and target date for minimum ROP observer coverage rate to be achieved.
48. It is acknowledged that there are some longline fisheries where the flag and/or coastal CCMs have achieved reasonable (high) levels of monitoring of fishing activities which means that some additional data is available to independently verify the limit. In these circumstances, and where the relevant data has been made available to the WCPFC and/or SSP, the level of verification would be higher than in other fisheries subject to the same applicable limits.
49. Further elaboration by the Commission of the criteria for “higher” levels of monitoring in longline fisheries could make it possible for the Secretariat in future dCMR evaluations, to confirm to which CCMs longline fisheries there is a higher level of confidence in the verification of compliance with catch limits. The Commission’s approach to incentivize increased longline observer coverage through the option in [CMM 2023-01 Attachment 1, Table 3](#) is a positive first step. The work currently being undertaken by the ERandEM IWG has the potential to expand the coverage of independently verified data sources.
50. In addition, there is opportunity to leverage electronic reporting to streamline and improve the efficiency of data flows from observers to WCPFC/SSP, both on longline and monitoring transshipment activities. More timely available observer data would support more timely cross-checking and verification of catch and transshipment reporting.
51. Expand available data sources for dCMR evaluations: Most limits applying in longline fisheries are subject to a minimum requirement of 5% ROP coverage rate in the WCPFC. So at least for the medium-term, there will continue to be a limitation if the dCMR assessments are based solely on WCPFC ACE tables. This is because the ACE tables are based on scientific data provisions, which are also submitted by CCMs for their vessel’s activities and are also mostly self-reported. In this respect, the following outcome from SC19 is pertinent: *“SC19 noted the explanation from the SSP that aggregating the catch by species in the longline operational data at the trip level (when the trip is terminated by an at-sea transshipment) is fundamental for the validation processes using other independent sources of data (e.g. transshipment observers and carrier declarations) to provide more certainty in the data used in assessments and other work of the Commission.”*¹⁵ So to improve the level of independent verification of longline catch or effort limits, it is necessary to increase ROP observer coverage and to enable use of Electronic Monitoring so as to increase the scope and coverage, and thus the availability, of independently collected data.
52. Individual vessel data and independent monitoring is needed where “fishing for” type limits are used: There may be opportunities to improve the level of verification that could be undertaken in future dCMR evaluations for these types of “fishing for” type obligations by using available Commission data for example comparing AR Pt2 reporting, VMS records, catch and effort data and other available reports about the activities of individual vessels.¹⁶ The extent to which such cross-checks could verify self-reported information related to compliance with a CCMs applicable “fishing for” type limit, will

¹⁴ No later than 30 June 2012, CCMs shall achieve 5% coverage of the effort in each fishery under the jurisdiction of the Commission (except for vessels provided for in paras 9 and 10). In order to facilitate the placement of observers the logistics may dictate that this be done on the basis of trips. Ref: [CMM 2018-05 Annex C 06](#).

¹⁵ SC19 Outcomes document paragraph 6

¹⁶ The Secretariat presented a suggestion in [TCC20 paper 25](#), but this was not agreed.

depend on the extent to which there is additional information and data about which individual vessels were authorized to be fishing for a particular species/stock covered by the relevant CMM.

53. The Commission at WCPFC20 (2023) noted the general limitation of TCC's assessments of compliance by CCMs with all billfish CMM limits because they are based on self-reported information, and further noted that there will continue to be limited data available to the Secretariat to independently verify the reporting by CCMs of compliance with these limits until the levels of independent monitoring are improved significantly through increased observer coverage and implementation of E-monitoring.¹⁷ TCC21 will receive an update from the SSP on the task from the Commission at WCPFC21 (2024) to provide additional information on catches and for the determination of "fishing for" North-west Pacific striped marlin [CMM 2024-06 05](#) and South-west Pacific striped marlin [CMM 2006-04 01](#).
54. In addition, there are associated reporting requirements set out in some of these CMMs where CCMs are required to submit additional information about their approach to implementing the CMM, and the steps a CCM is following to ensure compliance by its vessels with catch limit/s and other obligations.
55. Develop catch documentation schemes where catch limits are used: In the medium-term, work to develop and implement catch documentation schemes is also expected to provide better confidence in catch reporting, and this is expected to increase the level of verification that can be undertaken in the future of compliance with catch limits. The Northern Committee at its recent meeting, and through the joint working group with IATTC, has continued to progress work that could in the future enhance the verification of Pacific Bluefin tuna catch limits.

Summary

56. The Commission at WCPFC20 tasked the TCC to consider whether any adopted audit points for Quantitative Limit obligations require additional verification sources or processes to better facilitate compliance assessments.¹⁸
57. The tables in **Annex 1** confirm that the status of independent verification has been unchanged since 2023, when the available data to verify paper was first prepared. Independent verification remains uneven across Tuna and Billfish CMMs and associated obligations. This is because existing data sources that are available to the Secretariat to verify compliance with limits vary in coverage and scope across fisheries. In addition, based on the audit points, different types of limits require different approaches to verify a CCM's reported information.
58. For some fisheries where greater coverage by observers or E-monitoring has already been achieved, making the data available to WCPFC and/or Scientific Services provider in a form that can be readily used for cross-checking of fishing activities, would increase confidence in the evaluations that are undertaken through the dCMR of these catch limits.
59. The work currently being undertaken by the ERandEM IWG has the potential to expand the coverage of independently verified data sources. Once these independently verified data sources are established, these will further assist in improving the level of verification that can be undertaken in future dCMR evaluations for longline fishing activity-based limits.

¹⁷ See paragraph 704 of the WCPFC20 Summary Report_Rev01. [<https://meetings.wcpfc.int/node/21722>]

¹⁸ See paragraph 754(f) of the WCPFC20 Summary Report_Rev01.

Part 2: Verifying compliance with certain obligations aimed at mitigating impacts of fishing

Highlights for TCC21 Agenda 7.4, 7.7 and 7.8

Evaluation approach: dCMR evaluations of obligations and reporting requirements related to FAD management and monitoring, Shark CMM, prohibition of use of large-scale driftnets, prohibition on discharge of plastics, mitigation measures to protect seabirds and sea turtles for 2023–2025 are guided by adopted audit points. The discussion in this section and the information in **Annex 2** highlights that the Secretariat's ability to verify compliance depends on the availability of supporting data.

Use of Additional Data: Where possible, the Secretariat drew on multiple external and internal data sources to strengthen evaluations. For example, ACE tables were used to determine applicability of shallow-set fishery circle hook requirements or geographical seabird mitigation measure requirements.

Status of Independent Verification: Unchanged since 2023.

- **Independently verified using data from multiple sources:** *nil*
- **Partially verified:** *nil*
- **Evaluation based on self-reported information:** FAD-related implementation obligations, Shark CMM implementation obligations, prohibiting use of large-scale driftnets, prohibiting discharge of plastics, requiring mitigation measures to protect seabirds and sea turtles

Identified Constraints: Persistently low and uneven observer coverage across the Convention Area, particularly in the northwest Pacific and south of 23°S undermines the reliability of longline catch and bycatch estimates. COVID-19 further reduced observer deployment in 2020–2021, with only a return to already low pre-pandemic levels by 2023. Only limited improvements in the accuracy of longline catch and bycatch estimates, and in the verification of reporting on the implementation of bycatch mitigation obligations, can be expected without expanded human and electronic monitoring to strengthen both spatial and temporal data coverage.

Ways to improve robustness of independent verification:

- For some fisheries where **greater coverage by observers or E-monitoring has already been achieved**, make the data available to WCPFC and/or Scientific Services provider in a form that can be readily used for reviews and verification of obligations aimed at mitigating impacts of fishing.
- To ensure better reliability of longline catch and bycatch data, a **higher minimum ROP observer coverage rate** should be established. Current gaps in coverage, combined with limited historical effort data and species identification challenges, have led to high uncertainty in bycatch estimates.
- **Ongoing IWG work** (FAD-MO, ROP, ERandEM) is refining monitoring programs by advancing improvements in FAD management, observer data use, and electronic monitoring to strengthen data quality, transparency, and compliance verification.
- Continuing to track and support CCMs to **address implementation gaps**, while recognizing that the upgraded CMR online system now allows TCC to monitor CCMs' progress on agreed Audit Points, with most obligations reviewed and many CCMs having met compliance requirements.

60. The adopted Audit Points¹⁹ for implementation obligations are based on the following template language:

The CCM submitted a statement in AR Pt2 that:

- a. confirms CCM's implementation through adoption of a national binding measure that ensures {xxx};*
- b. describes how CCM is monitoring its vessels to ensure they do/do not {xxx}, and how potential infringements or instances of non-compliance with this requirement are handled.*

61. At present, CCMs include references and/or links to the relevant sections of their national policies and procedures in their AR Pt2 reports. The Secretariat's understanding is that these are noted for further review by CCMs (if interested), but that a review of the national implementation itself is not required as part of the Secretariat's preparation of the dCMR.

62. Consequently, recent Secretariat evaluations in the dCMR of most implementation obligations involved the Secretariat checking if a CCM's statement of implementation for an obligation reported in AR Pt2 fully met the two parts (a. and b.) of the Audit Point.

63. The adopted Audit Points²⁰ for report obligations are based on the following template language:

The Secretariat confirms that CCM submitted in AR Pt2 or AR Pt 1 that:
{xxxx}

OR

The Secretariat confirms receipt of {xxx} report of {XXX}

OR

The Secretariat confirms that the CCM submitted the required information contained in the template in {XXX}

¹⁹ CMM 2023-04 paragraph 8 (ii) states that through the Compliance Monitoring Scheme the annual assessment of compliance for other obligations shall be determined based on the following criteria:

- a. Implementation – where an obligation applies, the CCM is required to provide information showing that it has adopted, in accordance with its own national policies and procedures, binding measures that implement that obligation; and
- b. Monitor and ensure compliance – the CCM is required to provide information showing that it has a system or procedures to monitor compliance of vessels and persons with these binding measures, a system or procedures to respond to instances of non-compliance and has taken action in relation to potential infringements.

²⁰ CMM 2023-04 paragraph 8 (ii) states that through the Compliance Monitoring Scheme the annual assessment of compliance for other obligations shall be determined based on the following criteria:

- a. Implementation – where an obligation applies, the CCM is required to provide information showing that it has adopted, in accordance with its own national policies and procedures, binding measures that implement that obligation; and
- b. Monitor and ensure compliance – the CCM is required to provide information showing that it has a system or procedures to monitor compliance of vessels and persons with these binding measures, a system or procedures to respond to instances of non-compliance and has taken action in relation to potential infringements.

64. The expected response, if there is a question in AR Pt2, is the CCM confirmation that they supplied the required report or information.²¹ In some cases, reporting obligations do not have AR Pt2 questions, because the Secretariat recognizes that a report requirement may be met by responses through CCMs use of WCPFC online reporting systems or through reporting submitted in other ways to the Commission. In either case, the Secretariat will confirm receipt and that the report describes the CCM's activities in the Reporting Year against an implemented obligation.
65. The dCMR evaluations of report obligations are guided by the Audit Points. So, the quality of the reported information against the expected content of the report is not assessed unless the Audit Point requires the Secretariat to confirm or verify the described activity would meet the obligation.
66. **Annex 2** presents a reference list of the current data sources and verification approach for certain obligations aimed at mitigating impacts of fishing and their relevant audit points. It should be noted that there are many report requirements and deadlines that are not included in this Annex. The scope has been limited to fewer reporting obligations for the 2023–2025 review period, to keep the overall dCMR workload for CCMs, TCC, and the Secretariat manageable.²²

[FAD Management and Monitoring requirements](#)

67. **Annex 2, Table 2.1** includes five obligations that are implementation obligations related to FAD Management and Monitoring:
- FAD Closure Rules - high seas ([CMM 2009-02 03-07](#))
 - Purse seine 1 1/2 month FAD closure (1 July - 15 August) ([CMM 2023-01 13](#))
 - Annual advice on choice and implementation of one additional month high seas purse seine FAD closure (April, May, Nov or Dec) ([CMM 2023-01 14](#))
 - Required FAD design and construction specification requirements to reduce the risk of entanglement of sharks, sea turtles or other species (effective 1 Jan 2024) ([CMM 2023-01 16](#))
 - Each purse seine vessel is limited to no more than 350 FADs with activated instrumented buoys. ([CMM 2023-01 21](#))
68. The approach used by the Secretariat in recent dCMR evaluations of most FAD-related obligations is based on a comparison between the statement of implementation to the Audit Point. The exceptions are the FAD Closure obligations, where the Audit Point tasks the Secretariat to consider the CCM's own notifications of exempted vessels or choice of implementation.

Summary - FAD Management and Monitoring requirements

69. The evaluation of FAD-related implementation obligations in the dCMR prepared by the Secretariat involved comparing AR Pt2 and other CCM self-reported information to the relevant Audit Point criteria.
70. Evaluations in the dCMR of FAD-related implementation obligations were **not** independently verified.

²¹ In some cases, reporting obligations do not have AR Pt2 questions. This is because where it is possible to do so, the Secretariat has sought to streamline AR Pt2 questions, through recognizing that a report requirement is fulfilled by responses to other questions, or through CCMs use of WCPFC online reporting systems.

²² This is further explained in the Secretariat paper presenting principles to support decisions on the list of obligations for assessment in the CMS ([TCC21-2025-10](#))

[Sharks CMMs](#)

71. **Annex 2, Table 2.2** includes three obligations that are implementation obligations related to the Shark CMM (CMM 2022-04). This list represents a subset of the implementation and reporting obligations in the Shark CMM.
72. Guided by the Audit Point, the approach used by the Secretariat in recent dCMR evaluations of Shark CMM obligations is based on an evaluation of the statement of implementation against the Audit Point.

Summary – Shark CMMs

73. The evaluation of Shark CMM implementation obligations in the dCMR prepared by the Secretariat involved evaluating AR Pt2 against the relevant Audit Point criteria.
74. Most evaluations in the dCMR of Shark CMM implementation obligations were **not** independently verified.

[Other obligations related to mitigating impacts of fishing, including on species of special interest](#)

75. **Annex 2, Table 2.3** includes a selection of implementation obligations including prohibition of use of large-scale driftnets ([CMM 2008-04 02](#)), prohibition on discharge of plastics ([CMM 2017-04 02](#)), mitigation measures to protect seabirds ([CMM 2018-03 01, 02, 06](#)) and mitigation measures to protect turtles ([CMM 2018-04 07 \(a, b\)](#) and [CMM 2018-04 07d](#)).
76. The approach used by the Secretariat in most recent dCMR evaluations is based on an evaluation of the statement of implementation against the Audit Point. An exception was [CMM 2018-04 07 \(a, b\)](#) because the adopted Audit Point included an additional provision specifying that the Secretariat was to *confirm the CCM provided information in AR Pt2 of any CCM interactions with sea turtles in fisheries managed under the Convention and confirm that CCMs vessels are required to record all incidents involving sea turtles during fishing operations*.
77. In addition, the Secretariat used ACE tables data from SPC to check applicability to flag CCMs of the seabird mitigation requirements based on latitudinal range, and for mitigation measures in shallow-set longline fisheries for swordfish.

Summary

78. The evaluation in the dCMR prepared by the Secretariat of implementation obligations prohibiting use of large-scale driftnets, prohibiting discharge of plastics, requiring mitigation measures to protect seabirds and sea turtles, involved evaluating AR Pt2 CCM self-reported information against the relevant Audit Point criteria.
79. Most evaluations in the dCMR of these implementation obligations were **not** independently verified.

[Improving the robustness of verification of certain obligations at mitigating impacts of fishing](#)

80. Address limited observer coverage: In considering whether there are additional data sources that could be used to support reviews of compliance with implementation obligations, it is important to recognise that the Regional Observer Programme (ROP) was established

*“to collect verified catch data, other scientific data and additional information related to the fishery from the Convention Area and to monitor the implementation of the conservation and management measures adopted by the Commission”.*²³

81. TCC21 supplementary paper to the Annual Report on the Regional Observer Programme ([TCC21-2025-RP02 suppl](#)) details how data and information collected by the ROP are currently used in the CMS, and information about some of the current limitations.

82. More recently, a paper prepared by SPC for the SC21 meeting provided an update on ongoing work to develop region-scale bycatch estimates for the WCPFC longline fishery for a wide range of bycatch groups, including finfish, billfish, sharks and rays, marine mammals, and sea turtles, based on available observer data.²⁴ The following key points were noted:

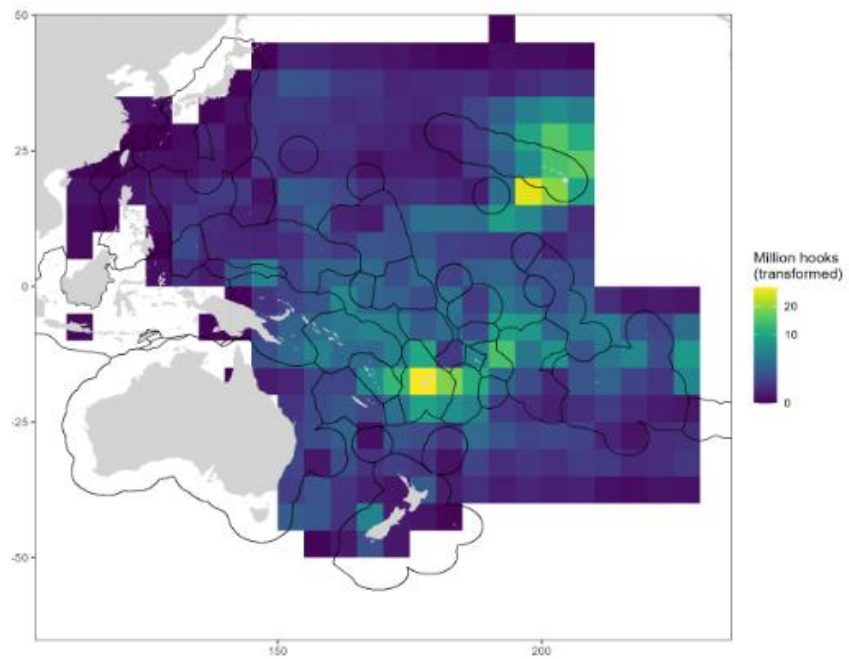
- Limited observer coverage – Key longline fleets, particularly in the northwest Pacific, had very low coverage, making catch estimates for that region and the wider Convention Area unreliable.
- COVID-19 impacts on observer coverage – Observer deployment on longliners dropped in 2020–2021 due to the pandemic, but coverage had recovered to pre-COVID levels by 2023.
- Challenges in obtaining reliable estimates of WCPO longline catches – Low and uneven observer coverage and limited historical effort data,²⁵ means that estimates of longline catches in the WCPO and across the Convention Area remain uncertain and should be interpreted with caution.
- Need for better monitoring – Expanded human and electronic monitoring, both in terms of the level and spatial coverage, would strengthen estimates of catch rates and total catches of bycatches in longline fisheries.

83. **Figure 1** below supports these key points and provides a comparison between current observer coverage and reported fishing effort, during the period 2003 - 2023.

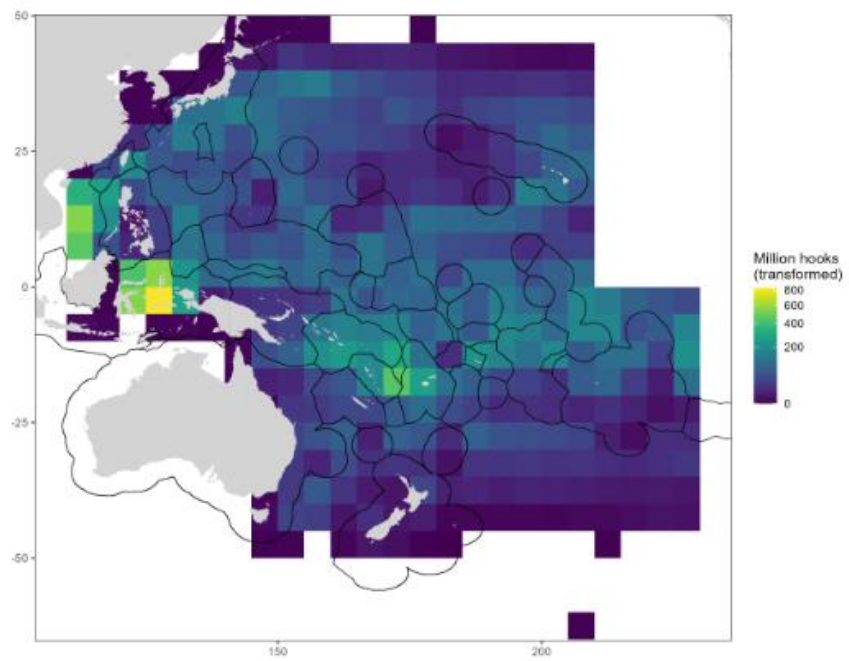
²³ WCPF Convention Article 28

²⁴ *Summary of bycatch in WCPFC longline fisheries at a regional scale, 2003-2023* ([SC21-ST-WP-09](#), dated 16 August 2025) – prepared by SPC-OFI

²⁵ “limited historical effort data” is referring to “ low coverage of available aggregate effort data disaggregated by hooks between floats prior to 2010”.



(a) Observed effort



(b) Reported effort

Figure 1. (a) Observed longline fishing effort (in data available to the SSP) and **(b)** total reported longline fishing effort ('000 hooks) in the WCPFC-CA from 2003 to 2023. Note that colour scales are different for the two panels, and a square root transformation was applied.²⁶

²⁶ Figure 3, [SC21-ST-WP-09](#), (p. 18)

84. An information paper prepared by SPC for the SC21 meeting, in support of the ongoing review of CMM 2018-03 on seabirds, sought to provide context for proposals to improve estimates of seabird bycatch in the WCPO.²⁷ In relation to available data to support robust estimates of seabird bycatch, the following key points were noted:

- High uncertainty in bycatch estimates – the most recent (2019) seabird bycatch estimates were highly uncertain because reported captures are rare, species ID issues, and low observer coverage, worsened by Covid-19 disruptions.
- Low observer coverage between equator and 50°S – Coverage remains consistently low across latitudinal bands, especially south of 23°S; post-Covid recovery has only returned to already low pre-pandemic levels (see **Table 1**, below).
- Limited improvement likely – Ongoing data and coverage challenges mean only limited improvements to seabird bycatch estimates are expected.

Table 1. Comparison of the number of hooks fished ('Fished'), the number of hooks observed by human observers ('Observed'), and the coverage percentage ('Coverage') for each 10 degree latitudinal band in the WCPFC Convention Area between the equator and 50S. All hook metrics are in hundreds of hooks.²⁸

Year	Latitude	Fished	Observed	Coverage
2020	0 to 10S	848,023	38,979	4.6
	10S to 20S	2,052,952	122,073	5.9
	20S to 30S	1,041,412	50,813	4.9
	30S to 40S	555,487	10,471	1.9
	40S to 50S	137,945	2,036	1.5
2021	0 to 10S	824,253	46,789	5.7
	10S to 20S	1,824,524	78,832	4.3
	20S to 30S	978,429	22,150	2.3
	30S to 40S	408,306	5,820	1.4
	40S to 50S	131,965	820	0.6
2022	0 to 10S	1,187,588	68,647	5.8
	10S to 20S	1,926,874	97,709	5.1
	20S to 30S	797,497	23,331	2.9
	30S to 40S	301,268	3,489	1.2
	40S to 50S	73,694	457	0.6
2023	0 to 10S	845,517	70,432	8.3
	10S to 20S	1,609,519	110,371	6.9
	20S to 30S	671,900	37,072	5.5
	30S to 40S	325,455	6,343	1.9
	40S to 50S	93,207	5,869	6.3
2024	0 to 10S	985,514	49,853	5.1
	10S to 20S	1,961,354	87,316	4.5
	20S to 30S	834,524	43,505	5.2
	30S to 40S	246,716	2,004	0.8
	40S to 50S	58,802	18	0.0

²⁷ *Summaries of longline fishing effort and observer coverage with respect to the review of the seabird bycatch CMM 2018-03* ([SC21-EB-IP-17](#), dated 30 June 2025) – prepared by SPC-OFP.

²⁸ Table 12, [SC21-EB-IP-17](#) (p.10)

85. Finalize IWG work to refine WCPFC's existing monitoring programs: The range of work currently being undertaken through various Intersessional Working Groups (IWG) to refine WCPFC's existing monitoring programs could support improvement in the quality and quantity of CCM's data available for independent verification of implementation obligations.
- The FAD Management Options Intersessional Working Group (FAD-MO IWG) is currently progressing work toward strengthening FAD management, including refining FAD logbook data fields, addressing buoy deactivation practices affecting dFAD deployment limits, and advancing discussions on vessel types permitted to engage in FAD-related activities. It is also supporting the development of tools such as a web portal for FAD stranding reports and mechanisms to improve recovery programs and data transparency across CCMs.
 - In parallel, the [ROP-IWG](#) is progressing work aimed at enhancing ROP data fields and streamlining the notification of potential compliance issues from observer-collected data. This has the potential to improve verification of compliance with obligations designed to mitigate the impacts of fishing.
 - Likewise, the [ERandEM-IWG](#) is progressing efforts to establish E-monitoring as a tool to meet WCPFC's data needs.
86. Continuing to track progress on resolving implementation gaps: TCC21 paper 10 ([TCC21-2025-10](#)) provides an update on progress in addressing implementation gaps by CCMs. The paper confirms that by the conclusion of TCC21, most implementation obligations with agreed Audit Points will have been reviewed by the TCC. It also highlights that for certain obligations, most CCMs have met all agreed Audit Points, and that TCC now has a mechanism, supported by the upgraded CMR online reporting system, to track progress on CCMs' implementation gaps.
87. Looking ahead, experiences from other RFMOs in auditing national compliance may be instructive in situations where CCMs have persistent implementation gaps and capacity assistance has not resolved the issue. A recommendation from the [2018 Report](#) from the Independent Panel to Review the CMS stated that WCPFC should not adopt a national compliance audit model that periodically reviews all CCMs. Instead, the Panel advised that until CCMs agree on a structured schedule of responses to non-compliance, WCPFC should consider a Quality Assurance-type system. Such a system would be applied in targeted cases where there is a pattern of serious non-compliance by a CCM, possibly indicating systemic failures.²⁹
88. Consider audit point reviews based on the prevalence of potential compliance issues identified in Article 25(2) notifications within CCFS data: The final CMR adopted at WCPFC20 records several views expressed at TCC19 (2023) regarding possible linkages between information on potential vessel infringements, aggregated summary tables generated from the online Compliance Case File System, and the IUU listing procedure.

"TCC19 discussed the relationship between the compliance assessments under CMM 2019-06 and the draft IUU vessel list. TCC19 agreed that the revised CMM on CMS was clear that compliance of individual vessels was not to be considered in the CMS process and that there was a need to separate these two processes. Some CCMs noted that there was a distinction between reporting that all the necessary legislative mechanisms are in place to implement

²⁹ [WCPFC15-2018-26](#) *Final Report from the Independent Panel to review the Compliance Monitoring Scheme* The panel had noted examples of some tuna RFMOs approach to national compliance audit processes. One example was that of CCSBT, which has a routine Quality Assurance-type system on a regular basis. Another example was the IOTC when a compliance mission had been completed in cooperation with the relevant CCM.

an obligation, and the actual implementation of the obligation. For some obligations, the actual implementation was currently not assessed in the CMS. TCC19 agreed that discussion in the context of compliance verification (TCC19 Agenda Item 7) would be useful to capture other data sources that could be used to verify compliance. There was also the potential to raise such issues when discussing the aggregated tables.” (Final CMR Adopted at WCPFC20, paragraph 33)

Summary

89. The tables in **Annex 2** confirm that the status of independent verification has been unchanged since 2023, when the available data to verify paper was first prepared. Compliance with obligations related to FAD management, shark measures, seabird and turtle mitigation, and prohibitions on plastics and driftnets is largely assessed against CCM implementation statements, so independent verification of CCMs implementation statements remains minimal. In addition, there is low and uneven longline observer coverage available to the Secretariat and SSP to verify compliance with obligations and reporting requirements related to mitigating the impacts of fishing.
90. Intersessional work currently underway through three IWGs to improve and expand data collection has the potential to significantly enhance the credibility of the Commission’s compliance reviews, particularly in relation to FAD management and monitoring and obligations aimed to mitigate the impacts of fishing. Once independently verified data sources are established, they will further strengthen the level of verification that can be applied in future dCMR evaluations, including those assessing longline fishing activity-based limits.

PART 3: Improving the monitoring and verification of fishing activities, particularly in the high seas

Highlights for TCC21 Agenda 7.5 and 7.9

Evaluation approach: dCMR evaluations of obligations and reporting requirements related to high seas transshipment, RFV and VMS, observer coverage, scientific data submissions, and daily catch and effort reporting for 2023–2025 are guided by the adopted Audit Points. **Annex 3** highlights that the Secretariat’s ability to verify compliance depends on the availability of supporting data, the extent to which CCMs are using WCPFC/SSP online reporting tools and/or submitting data that meets WCPFC E-reporting standards, and the development status of analytical tools.

Use of Additional Data: Where possible, the Secretariat drew on multiple internal and external data sources to strengthen evaluations. Cross-checking across datasets provides a more complete and more reliable picture of vessel activity, improving confirmation of which vessels fished in a given reporting year. For example, the evaluation of VMS reporting (CMM 2014-02 9a) was supported by analyses that enabled the Secretariat to verify CCM self-reported information against multiple data sources.

Status of Independent Verification: Largely unchanged since 2023, but with new Secretariat compliance processes and analytical tools now being implemented, the Secretariat’s capacity to robustly verify fishing activities is expected to improve in the near term.

- **Verified using data from multiple sources:** Fished and Did not Fish reporting, and implementation of VMS reporting requirements.
- **Verified based on advice of the SSP:** Longline and purse seine observer coverage and scientific data submissions.
- **Evaluation based on self-reported information:** At-sea transshipment observer coverage, most daily catch and effort reporting obligations in CMM 2022-06, vessel authorization requirements, vessel and gear marking and technical specification.

Identified Constraints: There currently is a reliance on CCM self-reported AR Pt2 information for many obligations. Current analytical and data limitations in the Secretariat are preventing full verification of high seas transshipment reporting, and there is a recognized inability of the Secretariat to independently verify observer presence and coverage for at-sea transshipments.

Ways to improve robustness of independent verification:

- Ongoing work by the Commission and Secretariat aims to **strengthen monitoring and verification frameworks**, particularly for transshipment activities. For example, The Secretariat is deploying automated tools to detect vessel proximity and VMS/TSER discrepancies, with quarterly reconciliations that began in 2025.
- Expand access by the Secretariat to ROP observer monitoring data and further **streamline data flows for observer data** to WCPFC to support more timely cross-checking and verification of catch and transshipment reporting.
- Secretariat and the SSP continue to support CCMs to **align data submissions with WCPFC E-reporting standards** and **enhance cross-checking across multiple data sources** to further improve the independence, reliability, and robustness of future compliance evaluations.

Verifying Transshipment Activities

91. **Annex 3, Table 3.1** includes three obligations that prescribe limits on CCM's transshipment activities and the various reporting requirements that are regularly reviewed through the dCMR:
- Purse seine limit on at-sea transshipment ([CMM 2009-06 29](#));
 - High seas transshipments authorisation ([CMM 2009-06 34](#)); and
 - Prohibition on transshipment in the Eastern High Seas Pocket ([CMM 2016-02 06](#)).
92. The assessments in the dCMR of transshipment limits compares RFV data with Commission high seas transshipment data.
93. There are also four reporting requirements for high seas transshipment activities and the Audit Points require that timeliness and completeness of reporting are reviewed:
- Annual reporting on transshipment activities, including in port ([CMM 2009-06 11](#));
 - Notification in the RFV to confirm flag CCM authorization to tranship in the high seas ([CMM 2009-06 35 a \(ii\)](#)),
 - Notifications prior to a planned high seas transshipment event [CMM 2009-06 35 a \(iii\)](#); and
 - Post-transshipment declaration of each transshipment event [CMM 2009-06 35 a \(iv\)](#)
94. The assessments in the dCMR to check the completeness and timeliness of transshipment reporting is supported by CCM's use of the Transshipment Electronic Reporting System (TSER) for E-reporting of WCPFC high seas transshipment notifications and declarations, which meets the WCPFC E-reporting standards. The Annual Report on E-reporting ([WCPFC-TCC21-2025-RP09](#)) states that since 2020, 70% of high seas transshipment reports continue to be electronically received directly by WCPFC via the TSER system, and the Secretariat enters the remaining reports received via emails.
95. The approach used in dCMR evaluations for verifying transshipment activities is work-in-progress. The Annual Report on Transshipment ([WCPFC-TCC21-2025-RP03](#)) and the TCC19 paper on enhanced data analysis and interpretation ([TCC19-2023-18](#)) both explain the current status of the Secretariat's work to improve the analytical approach that would support future dCMR reviews of transshipment activities.
96. Detailed information on the limitations on the current use of ROP data to support compliance reviews was presented in a working paper to TCC19 and TCC20.³⁰ The Minimum Data fields for Observer Transshipment Monitoring adopted in 2023 may provide a regular source of observer data that can be used to cross-check reported transshipment events (see [WCPFC-TCC21-2025-RP03](#)). The purpose of cross-checking will provide information that would support identification of the necessary enhancements to data standards and the ability of an ROP Observer to provide independent verification.
97. Analytical tools have been developed to identify issues:
- **close proximity** - identifying where VMS positions for two vessels indicated they were within 100m of each other for at least 4 hours; and

³⁰ [WCPFC-TCC19-2023-09](#) *Use of ROP data in the Compliance Monitoring Scheme* and this year's update [WCPFC-TCC20-2024-09](#)

- **location discrepancies** - identifying significant differences between the VMS position report closest in time to locations reported through TSER.

These tools are now automated and extend analyses to support improved data quality and later in 2025, will be used alongside quarterly reconciliations of transshipment reporting issues. They also assist with more timely confirmed data that can be used to support monitoring and verification of VMS and transshipment issues by identifying potential errors or gaps in reported data for individual flag CCMs and by illustrating trends in activity within the Convention Area, to support Commission decision making. Additional data fields can be incorporated as the development of this tool progresses to better support verification and data quality, including data intended to be exchanged with other RFMOs.³¹

98. The Secretariat has identified the following gaps in currently available information to support monitoring and reporting of transshipments of tuna fisheries and associated bycatch species:

- Transshipment and observer reporting from the WCPFC/IATTC overlap area: Gaps persist in transshipments that occur in the IATTC/WCPFC overlap area, as data are typically available to only one RFMO based on the CCM's nomination of the rules it applies. A high-level assessment of active vessels in mid-2024 across RFMO's confirmed there were 1,332 vessels on the WCPFC RFV that were also listed on one or more other RFMOs vessel registers; CCSBT, IATTC, IOTC, NPFC, SPRFMO. This number included longliners, purse seiners, pole and line vessels, trollers, carriers, bunker vessels, research vessels, and support vessels.
- No link between WCPFC transshipment reports from vessels authorised to tranship in the Pacific and the location or port where the transhipped fish catch is landed.
- Inter-RFMO data exchange – limited automated systems for transshipment-related data exchange with some other RFMOs, particularly SPRFMO and NPFC, which constrains the ability of the Secretariat to address reporting gaps. For other RFMO's, principally CCSBT and IATTC, work is progressing to establish data exchanges. ([TCC21-2025-18](#))
- Monitoring and verification in IATTC area: A further gap exists for WCPFC in monitoring and verifying at-sea transshipments of WCPFC-caught fish in the IATTC Convention Area, as highlighted in both the [Annual Report on the Commission VMS](#) and [Annual Report on Transshipment Monitoring](#).
- Refinements to ROP Data Fields for Monitoring Transshipments: The ROP-IWG has been assigned additional work to evaluate the quality of transshipment observer reporting. The priority of this task will be confirmed during the review of the ROP-IWG workplan, which is scheduled for consideration at WCPFC22.

99. The ROP-IWG and ERandEM-IWG are each progressing work that is expected to refine and enhance the monitoring tools and associated reporting of at-sea transshipment activities in the WCPF Convention Area. It is also anticipated that the intersessional work to review WCPFC's Port State Measures may also assist in supporting verification efforts in the future.

Summary – Verifying Transshipment Activities

100. Given current analytical and data limitations, the dCMR evaluations of limit and reporting obligations related to high seas transshipment activities are currently **partially** verified.

³¹ [WCPFC-TCC21-2025-18](#) Data exchange arrangements with other RFMOs

101. Ongoing work by the Commission and Secretariat is expected to strengthen the overall monitoring and verification framework for transshipment activities in the short term. This will enhance the ability to independently verify at-sea transshipments and improve confidence in reported activities across the Convention Area.

Improving the quality of Commission VMS and RFV data

102. There are several obligations related to Commission VMS and RFV presented in **Annex 3, Table 3.2**. The approach used by the Secretariat in most recent dCMR evaluations is based on an evaluation of the statement of implementation against the Audit Point. For example RFV authorization requirements ([CMM 2018-06 04](#)), vessel and gear marking and technical specifications ([CMM 2004-03 02](#)).
103. An exception is the approach used in dCMR evaluations for VMS reporting ([CMM 2014-02 9a](#)). The evaluation considers the Audit Point for which was agreed in December 2023, alongside the Secretariat verification guidance as the basis for the evaluation of each CCM's VMS reporting activities. This dCMR evaluation draws from the outcomes of a verification undertaken by the Secretariat of [CMM 2018-06 09](#) Fished and Did not Fish reported status for the previous reporting period, which is also reviewed in the dCMR.
104. To strengthen verification of a vessel's "fished" status, the Secretariat has progressively implemented more rigorous cross-checking across multiple datasets. This process supports reviews of whether a CCM's flagged vessels "fished" or "did not fish," which is a critical factor in determining the applicability of fishing activity-based obligations. It is also used to review the applicability of quantitative limits and to verify compliance with vessel limits. The datasets used include VMS data, High Seas Boarding and Inspection Reports, CCFS case information, port inspection reporting, and transshipment reporting, with the option to incorporate additional sources as required.
105. In 2025, the Secretariat has introduced enhanced workflow processes, supported by analytical tools, to conduct a preliminary review of anticipated "fished" statuses for each CCM's vessels on the RFV for Reporting Year 2024. Many CCMs also submitted their fished/did not fish statuses well in advance of the 1 July deadline. Combined with the Secretariat's preliminary work, this enabled earlier completion of reviews and the provision of timely feedback to CCMs where clarifications were required. Earlier completion of these reviews provided a more timely, complete, and reliable RFV dataset for the reporting year, thereby strengthening other dCMR evaluations.
106. The Annual Report on Commission VMS ([WCPFC-TCC21-2025-RP01](#)) and the Annual Report on the Record of Fishing Vessels ([WCPFC-TCC21-2025-RP05](#)) provide information about the improvements to online reporting systems and Secretariat workflow processes to improve RFV and VMS quality. Some key highlights in 2024 and 2025, to improve the RFV data quality were:
- **RFV system enhancements:** to ensure charter details are correct, and that the Host CCM has confirmed the charter started as planned.
 - **Highlighting IMO/LR number reported gaps or authorization period expiry:** to assist flag CCMs with being aware of these issues and ensure the RFV remains current and accurate.

Summary - Improving the quality of Commission VMS and RFV data

107. The evaluation of most Commission VMS and RFV implementation obligations in the dCMR evaluated AR Pt2 against the relevant Audit Point criteria.

108. Most evaluations in the dCMR of implementation obligations related to operational requirements for fishing vessels were **not** independently verified.
109. The evaluation in the dCMR of the [CMM 2018-06 09](#) report obligation of whether a CCM's flagged vessels "fished" or "did not fish," was verified using data from multiple sources that were available to the Secretariat.
110. The evaluation in the dCMR of the [CMM 2014-02 9a](#) obligation to implement WCPFC VMS reporting requirements was verified using data from multiple sources that were available to the Secretariat.
111. Improved cross-checking across multiple datasets provides a more timely, complete, and reliable basis for confirming which vessels engaged in fishing in a given year. This process supports the Secretariat's verification of CCM-reported information in the VMS and RFV.
112. In turn, this strengthens verification of other CCM reporting that depends on an accurate record of the number and types of vessels that fished, thereby increasing confidence in these dCMR evaluations.

Verifying compliance with Observer Coverage Requirements

113. Observer coverage requirements are assessed as a flag CCM obligation. The current required observer coverage rates are:
- Purse seine vessels 20N and 20S: 100% observer coverage ([CMM 2023-01](#) paragraphs 32 and 33).
 - Longline vessels: a minimum rate of 5% ROP observer coverage ([CMM 2018-05](#), Annex C paragraph 6) and the option provided to certain flag CCMs in the tropical tuna CMM to increase bigeye longline catch limits by committing to increased observer coverage.
 - Transshipments-at-sea: a minimum rate of 100% ROP observer coverage with the observer usually deployed on the receiving vessel ([CMM 2009-06](#), paragraph 13).
114. WCPFC receives observer data management services through its Scientific Services Provider (SSP) contract with the Pacific Community – Oceanic Fisheries Programme (SPC-OFP). The SPC prepared reports based on observer data received, are used to verify CCMs reported observer coverage ([CMM 2012-03 02](#), [CMM 2018-05 Annex C 06](#) and [CMM 2023-01 33](#)) (**Annex 3, Table 3.3**).
115. Data from the high seas transshipment notifications and declarations are used to verify CCM AR Pt2 statements of implementation for [CMM 2009-06 13](#). However, this information cannot be independently verified, and at present, flag CCM reporting does not clearly indicate which vessel the observer is on for transshipment monitoring. Also, access to observer transshipment reports through the SSP is not yet established to enable verification of observer presence, the vessel the observer has been deployed to, and transshipment reporting (**Annex 3, Table 3.3**).

Summary - Verifying compliance with Observer Coverage Requirements

116. The evaluations in the dCMR of longline and purse seine observer coverage requirements ([CMM 2012-03 02](#), [CMM 2018-05 Annex C 06](#) and [CMM 2023-01 33](#)) are verified because they are based on advice of the SSP, as WCPFCs observer data manager, based on observer data received.

117. The evaluations in the dCMR of transshipment observer coverage for at-sea transshipments is **not** independently verified.

Review of Catch and Effort Reporting related to fishing activities

118. Provision of scientific data ([SciData](#)) is assessed regularly through the dCMR. The assessments comprise four parts: annual catch estimates ([SciData01](#)), Number of active vessels ([SciData02](#)), Operational level catch and effort data ([SciData 03](#)), and Size composition data ([SciData 05](#)).
119. The SSP prepares a report on the completeness of SciData submitted by CCMs and this report informs the Secretariat's evaluation of compliance with SciData requirements. In accordance with agreed Audit Points, the compliance assessments are based on a tiered scoring approach, which takes into consideration the impact of non-provision of SciData to the scientific work of the Commission (**Annex 3, Table 3.4**).
120. In support of timely data provision to WCPFC, [CMM 2022-06](#) relating to Daily Catch and Effort Reporting took effect on 1 January 2024 and requires that flag CCMs ensure vessel masters keep daily electronic logs of catch and effort data and provide this electronically to their relevant authority.³² In turn, this information is to be submitted to WCPFC, and, where possible, in accordance with the relevant E-reporting SSPs. Implementation of this requirement by CCMs is being assessed this year as part of the CMR for Reporting Year 2024.
121. Assessments of most obligations in this CMM rely on self-reported statements of implementation. For the assessment of [CMM 2022-06 04](#), the Secretariat relied on advice from the SSP related to Operational Catch and Effort Data Provision to verify implementation.
122. In preparing the 2025 dCMR evaluations of [CMM 2022-06 04](#) the Secretariat noted that its verification task is to confirm whether a CCM "*submitted the required information electronically*." However, the language in the paragraph also indicates that CCMs are to, "*where possible*," meet the agreed WCPFC Standards, Specifications and Procedures for E-reporting of operational catch and effort data. This wording implies that CCMs may, but are not strictly required to, submit data in accordance with the WCPFC E-reporting standards. Consequently, for the 2025 dCMR evaluations of this obligation, any report providing the required data fields, other than paper-based logbooks, was considered to potentially meet the requirement.
123. In addition, the 2025 dCMR evaluations of [CMM 2022-06 03](#), based on reviews of AR Pt2 responses, suggest that CCMs have applied different standards in implementing the requirement to ensure that the master of a vessel provides data "*electronically*". In some cases, this is met through the submission of an emailed copy of a hard-copy logbook or an MS Excel file maintained and emailed, while in others an electronic reporting system has been required.

Summary - Review of Catch and Effort Reporting related to fishing activities

124. The evaluations in the dCMR of Scientific Data submissions ([SciData](#)) are verified based on advice from the SSP using the tiered scoring approach.

³² Paragraph 1 of [CMM 2022-06](#)

125. Most evaluations in the dCMR of [CMM 2022-06](#) relating to Daily Catch and Effort Reporting were **not** independently verified. The evaluations in the dCMR of [CMM 2022-06 01](#), [CMM 2022-06 02](#), [CMM 2022-06 03](#) and [CMM 2022-06 05](#) compared AR Pt2 to the Audit Point criteria.
126. The evaluations in the dCMR of [CMM 2022-06 04](#) related to Operational Catch and Effort Data Provision were based on advice from the SSP.

Recommendations

127. TCC21 is invited to
- a. provide advice and recommendation on approaches to strengthen independent verification of key obligations in future WCPFC compliance reviews, including recommendations for further tasks to relevant intersessional working groups;
and
 - b. provide the Secretariat with guidance and feedback on whether any additional information should be included or of potential refinements that would be useful in future updates of this paper.

Information on current data sources and approaches to verify compliance with Quantitative Limits (QL) in Tuna and Billfish CMMs and associated obligations

The current data sources and approach to verify compliance in Tuna and Billfish CMMs with Quantitative Limit (QL) and associated obligations are summarized in the table below. The obligations are grouped within the table under the following six (6) themes:

- 1.1 Tropical Tuna CMM – Purse Seine Fishery
- 1.2 Tropical Tuna CMM – Tropical Longline Fisheries
- 1.3 Tropical Tuna CMM - Other Commercial Fisheries
- 1.4 Albacore Tuna CMMs
- 1.5 Pacific Bluefin Tuna CMMs
- 1.6 Billfish CMMs

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
1.1 Tropical Tuna CMM – Purse Seine Fishery			
<u>CMM 2023-01 24</u> Purse seine EEZ limits (for skipjack, yellowfin and bigeye tuna) and advice from other coastal CCMs of EEZ limits to be applied	Quantitative Limit (QL): 1. Coastal CCM or PNA Office on behalf of PNA Parties+Tokelau notified their EEZ PS effort or catch limit or collective PNA+Tokelau EEZ effort or catch limit to the Secretariat. 2. Coastal CCM confirms in AR Pt2 that its notified EEZ limit or the PNAO confirms on behalf of PNA+Tokelau that the notified collective EEZ limit has not been exceeded and the Secretariat can verify the CCM's reported information and confirm that the notified EEZ or collective EEZ limit has not been exceeded.	Limit Type: Days - AR Pt2 - SPC and Secretariat prepared catch and effort data summaries (EEZ PS days effort or PNA+Tokelau collective PS days effort) – this takes into consideration reconciliation between logsheets, VMS and observer coverage Limit Type: Catch - AR Pt2	TTM summary table of reported PS days fished in waters under national jurisdiction in RY was used by WCPFC to verify compliance. However, if a Purse Seine EEZ limit is expressed as a catch limit, then the PS days fished in waters under national jurisdiction in RY will be noted in the dCMR. The catch and effort data summaries available to the Secretariat do not routinely include PS catches by individual EEZ. In 2025, the Secretariat received partial catch data from SPC, confirming nil catches. .
<u>CMM 2023-01 25</u>	Quantitative Limit (QL): CCM submitted its high seas PS effort level in the area between 20N and 20S in AR Pt2 and the Secretariat can verify	Limit Type: Days - AR Pt2	ACE Table data of reported fishing days effort by PS vessels that operated in high seas of Convention area in RY was used by WCPFC to verify compliance. For applicable CCMs, the

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
High seas purse seine effort limits applying 20N to 20S	the CCM's reported information and confirm that the allowable limit has not been exceeded.	<ul style="list-style-type: none"> - ACE Tables (reported PS days effort in 20N to 20S high seas of Convention Area in RY) - SPC and Secretariat prepared catch and effort data summaries (reported PS days effort in 20N to 20S high seas of Convention Area in RY) – this takes into consideration reconciliation between logsheets, VMS and observer coverage 	choice to apply IATTC measures in the overlap area between IATTC and WCPFC has been considered.
		Limit Type: Vessels + Days <ul style="list-style-type: none"> - AR Pt2 - Secretariat prepared reconciliation of WCPFC VMS data and HSP1 entry and exit reports 	For vessels the Secretariat compared data related to the individual PH HSP1 catcher vessels that were reporting to WCPFC VMS, with the list of entry and exit reports received by the Secretariat from PH HSP1 catcher vessels in RY. The Secretariat also took into consideration whether there were any pending WCPFC VMS or RFV authorization data gap issues for PH HSP1 catcher vessels related to the RY.
<u>CMM 2023-01 Att 2 03</u> Philippines vessels Entry/Exit reports for HSP1-SMA	Report (RP): Obligations related to Tuna and Billfish CMMs 1. CCM submitted reports to the Secretariat at least 24 hours prior to entry and no more than 6 hours prior to exiting HSP1-SMA in the required format: VID/Entry or Exit: Date/Time; Lat/Long 2. Secretariat review of VMS alerts for CCM vessels operating in HSP1-SMA against received entry/exit reports does not show any discrepancies and Secretariat confirms CCM has no vessels with VTAF data gaps or other VMS reporting anomalies.	<ul style="list-style-type: none"> - AR Pt2 - Secretariat prepared reconciliation of WCPFC VMS data and HSP1 entry and exit reports - CCMs report on HSP1 activities annually submitted for review by SC and TCC 	The Secretariat compared data related to the individual PH HSP1 vessels that were reporting to WCPFC VMS, with the entry and exit report data received by the Secretariat from PH for HSP1 vessels in RY2022. The Secretariat also took into consideration if there were any pending WCPFC VMS or RFV authorization data gap issues for PH HSP1 vessels related to the RY
<u>CMM 2023-01 26</u> CCMs not to transfer fishing effort in days	Implementation (IM): Obligations related to Tuna and Billfish CMMs 1. CCM submitted a statement in AR Pt2 that: a. confirms CCM's	<ul style="list-style-type: none"> - AR Pt2 and AR Pt 1 - ACE Tables - Statement of Implementation 	ACE Table data of reported catches by # of vessels that operated in area N of 20S in RY was used by WCPFC as a partial source of data to verify compliance.

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
fished in the purse seine fishery to areas N20N and S20S	implementation through adoption of a national binding measure that ensures that CCM flagged purse seine vessels do not transfer effort in days fished to the area north of 20N and south of 20S b. describes how it is monitoring its flagged purse seine vessels to ensure they do not transfer effort in days fished to the area north of 20N and south of 20S and how the CCM responds to potential infringements or instances of non-compliance with this requirement. 2. The Secretariat can verify that the CCM's flagged vessels have not shifted PS effort to the area north of 20N and south of 20S.		Consider a report that reviews effort over time – to better evaluate the shift N20N S20S.
<u>CMM 2023-01 43</u> Limit by flag on number of purse seine vessels >24m with freezing capacity between 20N and 20S	Quantitative Limit (QL):Vessels [Vessel Capacity] The CCM reported its number of CCM flagged PS vessels >24m with freezing capacity and operating between 20N and 20S and the Secretariat can verify the CCM's reported information and confirm that the allowable limit has not been exceeded.	- AR Pt2 - Aggregate summary of Commission data (WCPFC RFV, Fished and Did not Fish and VMS data)	RFV and VMS data, and FFA good standing data are the available data that WCPFC used to verify compliance with the limit
<u>CMM 2023-01 44</u> CCM reported whether it replaced any of its flagged large scale purse seine vessels in the previous year and has advised the Commission that the replacement vessel did not result in an increase in carrying	Quantitative Limit (QL): Vessels [Vessel Capacity] CCM reported whether it replaced any of its flagged large scale purse seine vessels in the previous year and if so, that the replacement vessel did not result in an increase in carrying capacity or an increase in catch or effort from the level that was replaced, and the Secretariat can verify that the allowable limit was not exceeded.	- AR Pt2 - Aggregate summary of Commission data (WCPFC RFV, Fished and Did not Fish and VMS data)	RFV and VMS data, and FFA good standing data are the available data that WCPFC used to verify compliance with the limit

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
capacity or an increase in catch or effort levels			
1.2 Tropical Tuna CMM – Tropical Longline Fisheries			
<u>CMM 2023-01 38</u> Bigeye longline annual catch limits for 2024-2026, with adjustment to be made for any overage and certain CCMs may also increase the catch limit by committing to proportionate increase in observer coverage level above the minimum 5% ROP coverage level	<p>Quantitative Limit (QL): Catch The CCM reported its total bigeye longline catch in its AR Pt2 and the Secretariat can verify the CCM's reported catch level and confirm that the allowable limit has not been exceeded.</p> <p>*FOR any CCM who chose to increase its BET catch limit with a proportional increase of observer coverage, the Secretariat can confirm that the CCM notified the Secretariat by the end of February of the year of fishing operations and can verify and confirm, through ROP/EM data received by WCPFC, that the required observer coverage was achieved according to agreed upon minimum data standards for human and/or electronic monitoring.</p> <p>The Audit Point for <u>CMM 2021-01 37</u> was applied in the 2024 dCMR related to 2023 activities is "The CCM reported its total bigeye longline catch in its AR Pt2 and the Secretariat can verify the CCM's reported catch level and confirm that the allowable limit has not been exceeded."</p>	<ul style="list-style-type: none"> - AR Pt2 - ACE Tables - SPC and Secretariat prepared catch and effort data summaries (reported catch of LL vessels of bigeye tuna in RY) - Summary of CMM 2021-01 38 Required Report (monthly report) 	<p>ACE Table data of reported bigeye longline catch by LL vessels that operated in Convention area in RY was used by WCPFC to verify compliance. For applicable CCMs, the choice to apply IATTC measures in the overlap area between IATTC and WCPFC has been considered.</p> <p>Where applicable, the information in SC21-ST-IP05 Status of ROP data Management (13 July 2025) for RY was used as a measure of ROP LL Observer coverage achieved based on data submission.</p>
<u>CMM 2023-01 41</u> Bigeye longline catch limits by flag for	<p>Quantitative Limit (QL): Catch CCM reported its total bigeye longline catch in its AR Pt2 and the Secretariat</p>	<ul style="list-style-type: none"> - AR Pt2 - ACE Tables 	ACE Table data of reported bigeye longline catch by LL vessels that operated in Convention area in RY was used by WCPFC to

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
certain other members which caught less than 2000t in 2004	can verify the CCM's reported catch level and confirm that it does not exceed 2,000mt.	- SPC and Secretariat prepared catch and effort data summaries (reported catch of LL vessels of bigeye tuna in RY)	verify compliance. For applicable CCMs, the choice to apply IATTC measures in the overlap area between IATTC and WCPFC has been considered.
<u>CMM 2023-01 45</u> Limit by flag on number of longline vessels with freezing capacity targetting bigeye above the current level (applying domestic quotas are exempt)	Quantitative Limit (QL): Vessels [Vessel Capacity] The CCM reported in AR Pt2 its number of flagged LL vessels with freezing capacity targeting bigeye and the Secretariat can verify the CCM's reported information and confirm that the allowable limit has not been exceeded.	- AR Pt2 - Aggregate summary of Commission data (WCPFC RFV, Fished and Did not Fish and VMS data – but note RFV does not clearly identify which flag CCMs vessels are subject to the limit (only longline overall))	RFV and VMS data, which is by vessel type (and not specific to the defined limit), is the available data that WCPFC used to verify compliance with the limit
<u>CMM 2023-01 46</u> Limit by flag on number of ice-chilled longline vessels targetting bigeye and landing exclusively fresh fish above the current level or above the number of current licenses under established limited entry programmes (applying domestic quotas are exempt)	Quantitative Limit (QL): Vessels [Vessel Capacity] The CCM reported in AR Pt2 its number of flagged ice-chilled LL vessels targeting bigeye and landing exclusively fresh fish and the Secretariat can verify the CCM's reported information and confirm that the allowable limit has not been exceeded.	- AR Pt2 - Aggregate summary of Commission data (WCPFC RFV, Fished and Did not Fish and VMS data– but note RFV does not clearly identify which flag CCMs vessels are subject to the limit (only longline overall))	RFV and VMS data, which is by vessel type (and not specific to the defined limit), is the available data that WCPFC used to verify compliance with the limit

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
1.3 Tropical Tuna CMM – Other commercial fisheries			
<u>CMM 2023-01 48</u> Limit on total catch of certain other commercial tuna fisheries (that take >2000Mt of BET, YFT and SKJ)	Quantitative Limit (QL): Catch [Audit Point not yet agreed]	- AR Pt2 - ACE Tables - SPC and Secretariat prepared catch and effort data summaries (provides best available catch estimates for some CCMs fisheries)	<i>[obligation not included in list for evaluation in dCMR prepared in 2023 - 2025]</i>
1.4 Albacore tuna CMMs			
<u>CMM 2015-02 01</u> Limit on number of vessels actively fishing for SP ALB south of 20S above 2005 or 2000-2004 levels	Quantitative Limit (QL): Vessels CCM reported its number of flagged vessels actively fishing for SP Albacore south of 20S and the Secretariat can verify the CCM's reported information and confirm that the allowable limit has not been exceeded.	- AR Pt2 - ACE Tables (# vessels that targeted SP ALB S20S in RY as reported in operational data) - CMM 2015-02 04 Required Report	ACE Table data of reported catches by # of vessels that operated in area S20S in RY was used by WCPFC to verify compliance.
<u>CMM 2019-03 02</u> CCMs take measures to ensure level of fishing effort by vessels fishing for NP ALB is not increased	Quantitative Limit (QL): Vessels/Days CCM reported its level of fishing effort by its flagged vessels fishing for NP albacore and the Secretariat can verify that the allowable limit was not exceeded.	- AR Pt 1 and AR Pt2 - ACE Tables (reported catch by vessels in Convention Areas north of equator in RY) - Updated information on North Pacific albacore fishing effort – prepared by Secretariat for NC meeting - CMM 2019-03 03 Required Report	ACE Table data of fishing effort north of equator in WCPFC area in RY was used by WCPFC as a partial source of data to verify compliance. For many CCMs data reported by CCMs and collated in NC21-2025/WP-01 was Pacific wide, not specific to CA north of equator.
1.5 Pacific bluefin tuna CMMs			
<u>CMM 2023-02 02</u> Total effort by vessels for Pacific Bluefin limited to 2002 - 2004 levels in Area north of 20N	Quantitative Limit (QL): Vessels [vessels fishing for] CCM reported its total level of fishing effort by CCM's flagged vessels fishing for PBF north of 20N in its report to the Secretariat as required by paragraph 8 of the CMM, and the	- AR Pt2 - Annual Report to NC CMM 2023-02 08 & 14 Required Report 2024 only ACE Table data (days fishing effort north of 20N in RY as reported in operational data)	In 2025, CCMs Annual Report to NC was used by WCPFC to verify compliance. In 2024, ACE Table data of fishing effort north of 20N in WCPFC area in RY was used for the dCMR assessment, to provide a partial source of data to verify compliance.

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
	Secretariat can verify the CCM's reported total fishing effort and confirm that the CCM's allowable limit was not exceeded.		
<u>CMM 2023-02 03</u> Pacific bluefin tuna catch limits for Japan, Korea and Chinese Taipei applying from 2024	Quantitative Limit (QL): Catch CCM reported its total catches of PBF less than 30kg and 30kg or larger and the Secretariat can verify the CCM's reported total catches and confirm that the total catch level does not exceed the CCM's allowable annual limit.	- AR Pt2 - Annual Report to NC CMM 2023-02 08 & 14 Required Report	In 2025, CCMs Annual Report to NC was used by WCPFC to verify compliance. In 2024, ACE Table data of WCPFC key species in WCPFC-south and WCPFC-north in RY provides a partial source of data for WCPFC to verify compliance.
<u>CMM 2023-02 04</u> Pacific Bluefin 30kg or larger catch limits, by flag for certain other members	Quantitative Limit (QL): Catch CCM reported its total catches of PBF 30kg or larger and the Secretariat can verify the CCM's reported total catches and confirm that the CCM's catch of PBF 30kg or larger has not increased by more than 15% above its allowable limit, or that the CCM's catch of PBF 30kg or larger has not exceeded 10mt beyond the CCM's applicable baseline catch limit.	- AR Pt2 - Annual Report to NC CMM 2023-02 08 & 14 Required Report	In 2025, CCMs Annual Report to NC was used by WCPFC to verify compliance. In 2024, ACE Table data of WCPFC key species in WCPFC-south and WCPFC-north in RY was used by WCPFC to verify compliance.
1.6 Billfish CMMs			
<u>CMM 2006-04 01</u> Limit number of fishing vessels fishing for MLS south of 15S to 2000 – 2004 levels	Quantitative Limit (QL): Vessels [vessels fishing for] The CCM reported in AR Pt2 the number of its flagged vessels fishing for MLS south of 15S and the Secretariat can verify the CCM's reported number of vessels and confirm that the CCM's allowable limit has not been exceeded.	- AR Pt2 - ACE Tables (reported catch by # vessels that operated in area S15S in RY) - CMM 2006-04 04 Required Report	In 2025, ARPt2 reports were reviewed. In 2024, ACE Table data of reported catches by # of vessels that operated in area S15S in RY was used by WCPFC as a partial source of data verify compliance.
<u>CMM 2009-03 01</u> Limit number of vessels fishing for SWO south of 20S to	Quantitative Limit (QL): Vessels [vessels fishing for] The CCM reported in AR Pt2 its total number of flagged vessels fishing for	- AR Pt2 - AR Pt 1 CMM 2009-03 08 Required Report	ACE Table data of reported catches by # of vessels that operated in area S20S in RY was used by WCPFC to verify compliance.

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
the number in any one year between 2000-2005	SWO south of 20S and the Secretariat can verify the CCM's reported catch level and confirm that the CCM's allowable limit has not been exceeded.	- ACE Tables (# LL vessels that operated S20S in RY as reported in operational data)	
<u>CMM 2009-03 02</u> Limit the catch of SWO by its vessels in area south of 20S to the amount in any one year during 2000-2006	Quantitative Limit (QL): Catch The CCM reported in AR Pt2 its total catch of SWO by its flagged vessels in the area south of 20S and the Secretariat can verify the CCM's reported catch level and confirm that the CCM's allowable limit has not been exceeded.	Limit Type = Catch - AR Pt2 - AR Pt 1 CMM 2009-03 08 Required Report - ACE Tables (reported catch of vessels that operated S20S in RY)	ACE Table data of reported catches by # of vessels that operated in area S20S in RY was used by WCPFC to verify compliance.
<u>CMM 2009-03 03</u> CCMs shall not shift their fishing effort for SWO to the area north of 20°S	Implementation (IM): Obligations related to Tuna and Billfish CMMs 1. CCM submitted a statement in AR Pt2 that: a. confirms CCM's implementation through adoption of a national binding measure that ensures that CCM flagged vessels do not shift effort (for swordfish) to the area north of 20S b. describes how it is monitoring its flagged vessels to ensure they do not shift effort for SWO to the area north of 20S and how the CCM responds to potential infringements or instances of non-compliance with this requirement. 2. The Secretariat can verify that the CCM's flagged vessels have not shifted effort to the area north of 20S.	- AR Pt2 and AR Pt 1 - ACE Tables - Statement of Implementation	ACE Table data of reported catches by # of vessels that operated in area N of 20S in RY was used by WCPFC as a partial source of data to verify compliance. Consider a report that reviews effort over time – to better evaluate the shift N20S.
<u>CMM 2010-01 05</u> NP striped marlin catch limits applicable to CCMs with vessels fishing in the	Quantitative Limit (QL): Catch The CCM reported its catch level in AR Pt2 and the Secretariat can verify the CCM's reported catch limit and confirm that its allowable limit was not exceeded.	- AR Pt2 CMM 2010-01 08 Required Report - ACE Tables (reported catch by vessels in Convention Areas north of equator in RY)	ACE Table data of reported catches by # of vessels that operated in area north of the equator in RY was used by WCPFC to verify compliance. As is noted in the limit comment, some CCMs catches for 2000 - 2003 have not been verified.

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
Convention Area north of the equator: commencing 2011			
<u>CMM 2023-03 02</u> CCMs take measures to ensure fishing effort by fisheries taking > 200mt per year of NP SWO N20N is limited to 2008 – 2010	Quantitative Limit (QL): Vessels [vessels fishing for] The CCM reported in AR Pt2 its level of fishing effort of its fisheries taking North Pacific swordfish in the Convention Area north of 20N and the Secretariat can verify the CCM's reported information and confirm that the allowable limit has not been exceeded.	- AR Pt2 - ACE Table data (days and count of vessels fishing effort north of 20N in RY as reported in operational data) - Annual Report to NC CMM 2023-04 Required Report	ACE Table data of WCPFC key species in WCPFC-north in RY provides a partial source of data for WCPFC to verify compliance. As is noted in the limit comment, all CCMs baselines for the limits are unspecified. For many CCMs data reported by CCMs and collated in NC21-2025/WP-03 was not specific to CA north of 20N.

Information on current data sources and approaches to verify compliance with obligations and CMMs aimed at mitigating impacts of fishing

The current data sources and approach to verify compliance with certain Implementation (IM) and reporting (RP) obligations is summarized in the table below. The obligations are grouped within the table under the following three (3) themes:

2.1 FAD Management and Monitoring

2.2 Shark CMMs

2.3 Mitigating Impacts of Fishing, including on species of special interest

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
2.1 FAD Management and Monitoring			
<u>CMM 2009-02 03-07</u> FAD Closure Rules - high seas	Implementation (IM): Additional measures for tropical tunas CCM submitted a statement in AR Pt2 that: a. confirms CCM's implementation through adoption of a national binding measure that implements the high seas FAD closure rules outlined in paragraphs 3 to 7, CMM 2009-02. b. describes how it is monitoring and ensuring its fishing vessels are complying with the high seas FAD closure rules outlined in paragraphs 3 to 7, CMM 2009-02, and how the CCM responds to potential infringements or instances of non-compliance with this requirement.	- AR Pt2 Statement of Implementation	
<u>CMM 2023-01 13</u> Purse seine 1 1/2 month FAD closure (1 July - 15 August)	Implementation (IM): Additional measures for tropical tunas CCM submitted a statement in AR Pt2 that: a. confirms CCM's implementation through adoption of a national binding measure that prohibits CCM flagged PS vessels from fishing on FADs between 1 July and 15 August in EEZs and high seas between 20N and 20S. b. describes how	- AR Pt2 Statement of Implementation - Commission data (CCMs footnote 1 notifications)	For applicable CCMs – the Secretariat confirms 3IA notifications were or were not received within the deadline

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
	CCM is monitoring its flagged PS vessels to ensure they do not fish on FADs in EEZs and on high seas between 20N and 20S and how potential infringements or instances of non-compliance with this requirement are handled. *FOR PNA MEMBERS THAT NOTIFY EXEMPTIONS AS PER FOOTNOTE 1: In addition to the statements required in a and b for its flagged vessels operating in other EEZs and on the high seas between 20N and 20S, the PNA member submitted a notification to the WCPFC ED within 15 days of its approval of an arrangement to which domestic vessels that the one-and-a-half (1 1/2)-month FAD closure will not apply in PNA member EEZ.		
<u>CMM 2023-01 14</u> Annual advice on choice and implementation of one additional month high seas purse seine FAD closure (April, May, Nov or Dec)	Implementation (IM): Additional measures for tropical tunas Based on the CCM's notification by the required deadline of its choice of implementation of which additional one month of FAD closure on the high seas, the CCM has submitted a statement that: a. confirms CCM's implementation through adoption of a national binding measure that prohibits CCM flagged PS vessels from fishing on FADs on the high seas between 20N and 20S during the chosen one-month closure period b. describes how CCM is monitoring its flagged PS vessels to ensure they do not fish on FADs on the high seas between 20N and 20S during the chosen additional one-month closure period, and how potential infringements or instances of non-compliance with this requirement are handled.	- AR Pt2 Statement of Implementation - Commission data (CCMs notification of additional high seas FAD closure choice)	CCM provided a notification by the required deadline of its choice of implementation of which additional one month of FAD closure on the high seas

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
<u>CMM 2023-01 16</u> Required FAD design and construction specification requirements to reduce the risk of entanglement of sharks, sea turtles or other species (effective 1 Jan 2024)	Implementation (IM): Additional measures for tropical tunas CCM submitted a statement in AR Pt2 that: a. confirms CCM's implementation through adoption of a national binding measure that requires it to ensure that the design and construction of any FAD to be deployed in, or that drifts into, the Convention Area shall comply with the following specifications: • The use of mesh net shall be prohibited for any part of a FAD. • If raft is covered, only non-entangling material and designs shall be used. • The subsurface structure shall only be made using non-entangling materials. b. describes how the CCM is monitoring and ensuring that the requirements are met with respect to its flagged vessels, and how the CCM responds to potential infringements or instances of non-compliance with these requirements.	- AR Pt2 Statement of Implementation	
<u>CMM 2023-01 21</u> Each purse seine vessel is limited to no more than 350 FADs with activated instrumented buoys	Implementation (IM): Additional measures for tropical tunas CCM submitted a statement in AR Pt2 that: a. confirms CCM's implementation through adoption of a national binding measure(s) that limits each of CCM flagged PS vessel to 350 activated instrumented buoys, and that ensures its vessels comply with coastal State laws relating to FAD management. b. describes how CCM is monitoring its activation and deployment of instrument buoys and how potential infringements or instances of non-compliance with this requirement and coastal State laws relating to FAD management are handled.	- AR Pt2 Statement of Implementation	

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
2.2 Shark CMMs			
<u>CMM 2022-04 07-10</u> Take measures necessary to require all sharks retained on board their vessels are fully utilized and ensure the prohibition of finning (provide in Part 2 Annual Report) - includes consideration of para 10 request from CCM	Implementation (IM): Shark mitigation and fishery management CCM submitted a statement in AR Pt2 that: a. confirms CCM's implementation through adoption of a national binding measure that requires CCM flagged vessels to fully utilize any sharks that are retained on board and to prohibit any finning from taking place, or required alternative measures to ensure individual shark carcasses and their corresponding fins can be easily identified on board the vessel at any time b. describes how CCM is monitoring its flagged vessels to ensure that sharks are being fully utilized and fins are naturally attached to the carcass or alternative measures are applied as per the CMM, and how potential infringements or instances of non-compliance with this requirement are handled.	- AR Pt2 Statement of Implementation	
CMM 2022-04 16 Requirements to minimize bycatch of sharks in longline fisheries between 20N and 20S (effective 1 Jan 2024)	Implementation (IM): Shark mitigation and fishery management CCM submitted a statement in ARPt2 that: a. confirms CCM's implementation through adoption of a national binding measure that: i. prohibits its flagged longline vessels, between 20N and 20S, targeting tuna and billfish from using wire trace as branch lines or leaders, ii. requires its flagged longline vessels, between 20N and 20S, targeting tuna and billfish, if carrying wire trace as branch lines or leaders, to stow them, iii. prohibits its flagged longline vessels, between 20N and 20S, targeting tuna and billfish from	- AR Pt2 Statement of Implementation	

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
	using shark lines or branch lines running directly off of the longline floats or drop lines b. describes how the CCM is monitoring its flagged vessels, between 20N and 20S, to ensure the requirements are met and how its responds to potential infringements or instances of non-compliance with this requirement.		
<u>CMM 2022-04 22 (01 - 03)</u> Specific requirements to protect oceanic whitetip & silky sharks as specified in CMM 2022-04	Implementation (IM): Shark mitigation and fishery management CCM submitted a statement in AR Pt2 that: a. confirms CCM's implementation through adoption of a national binding measure that prohibits CCM flagged vessels or vessels under CCM charter to retain on board, tranship, store, or land any oceanic whitetip or silky shark, in whole or in part; requires release of any oceanic whitetip or silky shark that is caught, in accordance with applicable safe release guidelines; surrender in whole any unintentionally caught oceanic whitetip or silky shark that are frozen as part of CCM flagged PS vessels' operation to the responsible government authorities or discard them at the point of landing or transshipment, upon which any surrendered OWT or SS may be donated for human consumption b. describes how CCM is monitoring its flagged vessels or vessels it charters to ensure the requirements are met, and how potential infringements or instances of non-compliance with this requirement are handled.	- AR Pt2 Statement of Implementation - AR Pt 1 for supporting detail - Estimated number of releases of oceanic whitetip shark and silky shark caught in Convention Area, including the status upon release (dead or alive), through data collected from observer programs and other means.	

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
2.3 Mitigating Impacts of Fishing, including on species of special interest			
<u>CMM 2008-04 02</u> Measures necessary to prohibit use by their vessels of large-scale driftnets in the high seas	Implementation (IM): Driftnet Prohibition CCM submitted a statement in AR Pt2 that: a. confirms CCM's implementation through adoption of a national binding measure that prohibits CCM fishing vessels operating on the high seas in the Convention Area from using large-scale driftnets b. describes how it is monitoring its fishing vessels operating on the high seas in the Convention Area to ensure they are not using driftnets and how the CCM responds to potential infringements or instances of non-compliance with this requirement.	- AR Pt2 Statement of Implementation	
<u>CMM 2017-04 02</u> Prohibit fishing vessels from discharging any plastics (including plastic packaging, items containing plastic and polystyrene) but not including fishing gear	Implementation (IM): Marine Pollution mitigation CCM submitted a statement in AR Pt2 that: a. confirms CCM's implementation through adoption of a national binding measure that prohibits its fishing vessels from discharging any plastics (including plastic packaging, items containing plastic and polystyrene) b. describes how it is monitoring its fishing vessels to ensure they are not discharging plastics and how the CCM responds to potential infringements or instances of non-compliance with this requirement.	- AR Pt2 Statement of Implementation	
<u>CMM 2017-04 05</u> Encourage adoption of additional measures to reduce marine pollution	Report (RP): Marine Pollution mitigation The Secretariat confirms receipt of a statement from the CCM that describes how it encouraged its flagged vessels within the Convention Area to retrieve	- AR Pt2	Sect confirms receipt of the required statement

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
through retrieval of abandoned, lost or discarded fishing gear for discharge at port reception facilities and to report the location of abandoned, lost or discarded fishing gear	abandoned, lost or discarded fishing gear (ALDFG) and retain the material on board, separate from other waste for discharge to port reception facilities, and to report ALDFG.		
<u>CMM 2017-04 08</u> Requirement to actively support SIDS and Territories through provision of adequate port facilities for receiving and appropriately disposing of waste from fishing vessels	Report (RP): Marine Pollution mitigation The Secretariat confirms receipt from the CCM of a statement that describes how the CCM cooperated directly, or through the Commission, to actively support SIDS and Territories through the provision of adequate port facilities for receiving and appropriately disposing of waste from fishing vessels.	- AR Pt2	Sect confirms receipt of the required statement
<u>CMM 2018-03 01, 02 and 06</u> Required longline mitigation measures to reduce incidental catch of seabirds applying north of 23N or south of 25S	Implementation (IM): Seabird mitigation Based on CCM identification of which mitigation measures are being applied to CCM vessels in the applicable relevant area, the CCM submitted a statement in AR Pt2 that: a. confirms CCM's implementation through adoption of a national binding measure that requires its flagged longline vessels to: i. use at least two mitigation measures in paragraph 1(a) or hook shielding devices when fishing south of 30°S ii. use one of the mitigation measures in paragraph 2 when fishing in area 25°S-	- AR Pt2 Statement of Implementation and Required Report (CMM 2018-03 para 8) - AR Pt 1 - ACE Tables	

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
	<p>30°S</p> <p>b. confirms CCM's implementation through adoption of a national binding measure that requires its flagged longline vessels fishing north of 23°N:</p> <p>i. 24m or more in overall length, to use at least two mitigation measures in paragraph 6, Table 1 CMM 2018-03, including at least one from Column A</p> <p>ii. less than 24m in overall length, to use at least one of the mitigation measures from Column A in Table 1, CMM 2018-03.</p> <p>b. describes how it is monitoring and ensuring its fishing vessels comply with seabird mitigation requirements in paragraphs 1,2 and 6 of CMM 2018-03 and how the CCM responds to potential infringements or instances of non-compliance with the relevant requirement.</p>		
<p><u>CMM 2018-03 08</u></p> <p>Report on which mitigation measures are used north of 23N or south of 25S, as well as technical specifications. Subsequent years include advice on any changes</p>	<p>Report (RP): Seabird mitigation</p> <p>The Secretariat confirms that applicable CCMs with LL vessels fishing in the Convention Area south of 25°S or north of 23°N submitted information describing which of the mitigation measures the CCM requires its vessels to use, as well as the technical specifications for each of those mitigation measures, and any relevant changes to prior year reporting.</p>	<p>- AR Pt2 Statement of Implementation and Required Report (CMM 2018-03 para 8)</p> <p>- AR Pt 1</p>	<p>Sect confirms information was submitted noting response to CMM 2018-03 01, 02, 06</p>
<p><u>CMM 2018-04 06</u></p> <p>CCMs to require longline vessels to carry and use line cutters and de-hookers to handle</p>	<p>Implementation (IM): Sea Turtle mitigation</p> <p>CCM submitted a statement in AR Pt2 that:</p> <p>a. confirms CCM's implementation through adoption of a national binding</p>	<p>- AR Pt2 Statement of Implementation and Required Report (CMM 2018-04 para 2)</p>	

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
and promptly release sea turtles, as well as dip-nets where appropriate	measure that requires operators of CCM flagged LL vessels to carry and use line cutters and de-hookers to handle and promptly release sea turtles caught or entangled and where appropriate, carry and use dip-nets in accordance with WCPFC guidelines b. describes how CCM is monitoring its flagged LL vessels to ensure this requirement is followed and how potential infringements or instances of non-compliance with this requirement are handled.		
<u>CMM 2018-04 07 (a, b)</u> Sea Turtle mitigation requirements for shallow-set longline vessels	Implementation (IM): Sea Turtle mitigation CCM submitted a statement in AR Pt2 that: a. confirms CCM's implementation through adoption of a national binding measure that requires operators of CCM flagged LL vessels to employ at least one of the three mitigation methods listed in paragraph 7a of the CMM b. describes how CCM is monitoring its flagged LL vessels to ensure that at least one of the mitigation measures in paragraph 7a of the CMM is being employed, and how potential infringements or instances of non-compliance with this requirement are handled. OR c. if the Secretariat confirms that paragraph 7a requirements do not apply because SC has accepted in accordance with paragraph 7b that the CCMs shallow-set longline fishery/ies has minimal observed interaction rates of sea turtles	- AR Pt2 Statement of Implementation and Required Report (CMM 2018-04 para 2) - ACE Tables	ACE Table data in RY providing hooks between floats was used by WCPFC to check applicability. CMM 2018-04 para 2 report which is to include information about sea turtle interactions for RY was used by WCPFC to verify compliance.

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
	<p>AND</p> <p>The Secretariat confirms that CCM provided information in AR Pt 2 of any CCM vessel interactions with sea turtles in fisheries managed under the Convention and confirmation that CCM vessels are required to record all incidents involving sea turtles during fishing operations.</p>		
<p><u>CMM 2018-04 07d</u></p> <p>CCMs to ensure vessels fishing in a shallow-set manner are required to report all incidents involving sea turtles</p>	<p>Implementation (IM): Sea Turtle mitigation</p> <p>CCM submitted a statement in AR Pt2 that:</p> <p>a. confirms CCM's implementation through adoption of a national binding measure that requires its flagged longline vessels that fish in a shallow-set manner to record all incidents involving sea turtles during fishing operations and report such incidents to the appropriate national authorities.</p> <p>b. describes how CMM is monitoring and ensuring that its flagged longline vessels, that fish in a shallow-set manner, are recording all incidents involving sea turtles during fishing operations and reporting such incidents to the appropriate national authorities, and how the CCM responds to potential infringements or instances of noncompliance with these requirements.</p>	<p>- AR Pt2 Statement of Implementation</p> <p>- ACE Tables</p>	

Information on current data sources and approach to verify fishing activities, particularly in the high seas

The current data sources and approach to verify specific fishing activities are summarized in the table below. The obligations are grouped within the table under the following four (4) themes:

- 3.1 Transshipment activities
- 3.2 Operational Requirements for Fishing Vessels (RFV and VMS Requirements)
- 3.3 Observer related requirements
- 3.4 Catch and Effort Reporting related to fishing activities

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
3.1 Transshipment activities			
<u>CMM 2009-06 11</u> Annual report on all transshipment activities covered by this Measure (including transshipment activities that occur in ports or EEZs) in accordance with the specified guidelines (Annex II)	Report (RP): Fishing activity related requirement The Secretariat confirms receipt by the CCM in AR Pt 1 of the required information in the prescribed format contained at Annex II of CMM 2009-06, and confirms that the report includes the required information for all CCM transshipment events in the Convention Area of all HMFS covered by the Convention, as well as HMFS taken in the Convention Area and transhipped outside the Convention Area, in accordance with paras 10, 11, and 12 of CMM 2009-06.	Theme: - AR Pt2 - AR Pt 1 CMM 2009-06 11 required report (annual) - Summary of Commission data (high seas transshipment reports is reviewed by the Secretariat)	Secretariat will request additional information if in relation to any inconsistencies in the AR Pt1 report with Secretariat database.
<u>CMM 2009-06 29</u> Limit on purse seine vessels transshipment outside of port to vessels that have received an exemption from the Commission. Where applicable, flag CCM authorisation should be vessel-specific and address any specific conditions identified by the Commission.	Quantitative Limit (QL): Vessels The Secretariat verifies the information reported by the CCM in AR Pt2 and confirms that the CCM's allowable limit of PS vessels transshipping outside of port has not been exceeded. *Note additional reporting obligations for COVID19-related requirements: The Secretariat has received information in AR Pt2 of the CCM's approach to implementation of the suspension from 20 April 2020 to 15 March 2022.	-AR Pt2 - TCC Application - Aggregate summary of Commission data (RFV field for PS vessel authorisation to tranship)	The RFV updates of data field "PS Authorised to tranship at sea" were reviewed by the Secretariat

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
<u>CMM 2009-06 34</u> Ban on high seas transshipment, unless a CCM has determined impracticability in accordance with para 37 guidelines, and has advised the Commission of such.	Quantitative Limit (QL): Vessels The Secretariat confirms that none of the vessels for which the CCM is responsible has engaged in high seas transshipment, unless the CCM indicated in the WCPFC Record of Fishing Vessels or by other means of communication that the vessel or vessels are authorized pursuant to paragraph 37 of CMM 2009-06 to engage in high seas transshipment activities.	-AR Pt2 - TCC Application - Aggregate summary of Commission data (RFV field for authorization to tranship compared to reported transshipment event)	The TSER reporting and RFV updates of data field "HS Authorised to tranship at sea" were reviewed by the Secretariat
<u>CMM 2009-06 35 a (ii)</u> Flag State's notification to the Secretariat on its flag vessels that are authorised to tranship on the high seas	Report (RP): activity related reporting requirement The Secretariat confirms that CCM indicated its flagged vessels authorized to tranship on the high seas, including by completing the relevant data field in the RFV data.	- AR Pt2 - RFV	The RFV updates of data field "HS Authorised to tranship at sea" were reviewed by the Secretariat
<u>CMM 2009-06 35 a (iii)</u> High Seas WCPFC Transshipment Advance Notification (including fields in Annex III)	Report (RP): activity related reporting requirement Where a CCM (or chartering CCM) has indicated that it has authorized its flagged vessels to engage in high seas transshipment and indicated such authorization in its RFV, the Secretariat confirms that it has received the corresponding WCPFC high seas transshipment notification in respect of each CCM-authorized vessel in accordance with Annex III of CMM 2009-06 or WCPFC ER Standards for high seas transshipment.	- AR Pt2 - Summary of Commission data (high seas transshipment reports & # of transshipment notifications when compared to transshipment events)	The counts above are based on a comparison of notifications/declarations received in accordance with Annex III of CMM 2009-06 or WCPFC ER standards for high seas transshipment, with the Secretariats with criteria to link to applicable transshipment events.
<u>CMM 2009-06 35 a (iv)</u> High Seas WCPFC Transshipment Declaration (including information in Annex I)	Report (RP): activity related reporting requirement Where a CCM (or chartering CCM) has indicated that it has authorized its flagged vessels to engage in high seas transshipment and indicated such authorization in its RFV, the Secretariat confirms that it has received the corresponding WCPFC high seas transshipment declaration in respect of each CCM-authorized vessel in accordance with Annex I of CMM 2009-06 or WCPFC ER Standards for high seas transshipment.	- AR Pt2 - Summary of Commission data (high seas transshipment reports & # of transshipment declarations when compared to transshipment events)	The counts above are based on a comparison of notifications/declarations received in accordance with Annex I of CMM 2009-06 or WCPFC ER standards for high seas transshipment, with the Secretariats with criteria to link to applicable transshipment events

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
<u>CMM 2016-02 06</u> Transshipment is prohibited in E-HSP from 1 Jan 2019	Quantitative Limit (QL): Vessels The Secretariat confirms that none of the vessels for which the CCM is responsible has engaged in transshipment activities in the EHSP.	- AR Pt2 - Aggregate summary of Commission data (WCPFC VMS data and high seas transshipment reports)	The RFV, including "HS transshipment authorised", TSER reporting and potential transshipment analysis (based on WCPFC VMS data) were reviewed by the Secretariat.
3.2 Operational Requirements for Fishing Vessels (RFV and VMS Requirements)			
<u>CMM 2004-03 02</u> Fishing vessel marking and technical specifications	Implementation (IM): Fishing vessel marking and technical specifications CCM submitted a statement in ARPt2 that: a. confirms CCM's implementation through adoption of a national binding measure that requires CCM flagged vessel operators to mark their vessels in accordance with the marking and technical specification requirements of paragraphs 2.1 and 2.2 CMM 2004-03. b. describes how CCM is monitoring and ensuring that its flagged vessels are marked in accordance with the marking and technical specification requirements of paragraphs 2.1 and 2.2 CMM 2004-03, and how the CCM responds to potential infringements or instances of non-compliance with the relevant requirement.	- AR Pt2 Statement of Implementation	
<u>CMM 2006-08 07</u> Fishing vessels to accept HSBI boardings by duly authorised inspectors, and as applicable Members to ensure compliance of its authorised inspectors with the HSBI procedures	Implementation (IM): Vessel Authorisation requirements CCM submitted a statement in AR Pt 2 that: a. confirms CCM's implementation through adoption of a national binding measure that requires CCM flagged vessels operating on the high seas to accept boarding and inspection by authorized inspectors b. describes how CCM is monitoring and ensuring that in the event of an HSBI event, CCM flagged vessels are accepting authorized inspectors to carry out their activities, and how CCM responds to potential infringement or instances of non-compliance with this requirement.	- AR Pt2 Statement of Implementation - Summary of Commission data (HSBI reporting)	HSBI reports for this RY were used to verify compliance

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
<u>CMM 2014-02 9a</u> Fishing vessels comply with the Commission standards for WCPFC VMS including being fitted with ALC/MTU that meet Commission requirements	Implementation (IM): operational requirements for fishing vessels CCM submitted a statement in ARPt2 that: a. confirms CCM's implementation through adoption of a national binding measure that requires its flagged fishing vessels to comply with the Commission standards (contained in CMM 2014-02 and the VMS SSPs) for WCPFC VMS including being fitted with ALCs/MTUs that meet Commission requirements. b. describes how CCM is monitoring and ensuring that its flagged fishing vessels meet the Commission's VMS standards and requirements and how the CCM responds to potential infringements or instances of non-compliance with the relevant requirement.	- AR Pt2 Statement of Implementation - Aggregate summary of Commission data (WCPFC VRST data, FFA report on daily position counts, FFA good standing records, WCPFC Fished and Did not fish reports)	Secretariat routinely checks information confirming that a vessel which is authorised on the RFV is fishing in the Convention Area beyond their flag CCMs EEZ. The checks undertaken by the Secretariat are to ensure that CCM has provided complete VTAF details and the vessels ALC is reporting OR that vessel is currently on the FFA Good Standing List. The Secretariat also retrospectively checks vessels with status of 'Fished' and ensures that the data for each vessel for the RY is complete. The Secretariat has provided CCMs with online tools 1) VRST allows CCMs to monitor and using the interactive utility update their vessel's status (e.g., "In Port", "Out of Convention Area", "Manual Reporting", "new VTAF data submitted to Secretariat", etc.) at least every 31 days, 2) the Vessels system for RFV allows CCMs to request MTU activation and deactivation and to monitor the status of activation/deactivation by the Secretariat, and 3) the Secretariat has provided CCMs with an upload mechanism to submit manual position reports where there are identified VMS reporting gaps
<u>CMM 2014-02 9a VMS SSPs 2.8</u> VMS Provision of ALC/MTU 'VTAF' data	Report (RP): operational requirements for fishing vessels The Secretariat confirms that the CCM submitted information on annual catch levels by its flagged vessels taking SP Albacore, as well as the number of CCM flagged vessels actively fishing for SP Albacore south of 20S, with catch levels reported by species groups.	- AR Pt2 - Aggregate summary of Commission data (WCPFC VRST data, FFA report on daily position counts, FFA good standing records, WCPFC Fished and Did not fish reports)	Secretariat routinely checks information confirming that a vessel which is authorised on the RFV is fishing in the Convention Area beyond their flag CCMs EEZ. The checks undertaken by the Secretariat is to ensure that CCM has provided complete VTAF details and the vessels ALC is reporting OR that vessel is currently on the FFA Good Standing List. The Secretariat also retrospectively checks vessels with status of 'Fished' and will request that the

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
			relevant CCM clarify the status of vessels as needed
<u>CMM 2014-02 9a VMS</u> <u>SSPs 5.4 – 5.5</u> VMS Manual Reporting procedures - applies until 1 March 2024 and remains in force unless the Commission decides otherwise	Implementation (IM): operational requirements for fishing vessels CCM submitted a statement in AR Pt 2 that: a. confirms CCM's implementation through adoption of national binding measure that requires its flagged vessels to manually report in accordance with the VMS SSPs including the requirement to report its position manually to the Secretariat every 6 hours. b. describes how the CCM is monitoring and ensuring its flagged vessels comply with VMS manual reporting procedures in accordance with the VMS SSPs including the requirement to report its position manually to the Secretariat every 6 hours, and how the CCM responds to potential infringements or instances of non-compliance.	- AR Pt2 Statement of Implementation - Summary of Commission VMS data (VMS Manual Reporting received)	CCM had x vessels that were providing manual reports to the Commission VMS during RY
<u>CMM 2023-01 32</u> Purse seine vessels are not to operate under manual reporting during FAD closure period	Implementation (IM): operational requirements for fishing vessels CCM submitted a statement in ARPt2 that: a. confirms CCM's implementation through adoption of a national binding measure of the requirement for CCM flagged purse seine vessels to not operate under VMS manual reporting during FAD closure periods b. describes how CCM is monitoring and ensuring that its flagged purse seine fishing vessels do not operate under VMS manual reporting during FAD closure periods, and how the CCM responds to potential infringements or instances of non-compliance with the relevant requirement.	-AR Pt2 Statement of Implementation - Summary of Commission VMS data (VMS Manual Reporting received)	CCM had x purse seine vessels manually reporting to the Commission VMS in the RY
<u>CMM 2018-06 04</u> Vessels authorization requirement	Implementation (IM): operational requirements for fishing vessels CCM submitted a statement in AR Pt 2 that: a. confirms CCM's implementation through adoption of a national binding measure that ensures the authorizations it issues to its vessels to fish beyond its areas of national jurisdiction and in the	-AR Pt2 Statement of Implementation	

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
	Convention Area contain the following information: i. the specific areas, species and time periods for which the authorization is valid; ii. permitted activities by the vessel; iii. a prohibition of fishing, retention on board, transshipment or landing by the vessel in areas under the national jurisdiction of another State except pursuant to any license, permit or authorization that may be required by such other State; iv. the requirement that the vessel keep on board the authorization issued pursuant to paragraph 1 above, or certified copy thereof; any license, permit or authorization, or certified copy thereof, issued by a coastal State, as well as a valid certificate of vessel registration; and v. any other specific conditions to give effect to the provisions of the CMMs adopted pursuant to it.		
<u>CMM 2018-06 09</u> Submission by Member to ED a list of all vessels on national record in previous year, noting FISHED or DID NOT FISH for each vessel	Report (RP): operational requirements for fishing vessels The Secretariat confirms that a fished/did not fish report has been received from the CCM using the required template	- CMM 2018-06 09 Required Report (annual) - Aggregate summary of Commission data (WCPFC VRST data, FFA report on daily position counts, FFA good standing records, WCPFC Fished and Did not fish reports)	The Secretariat routinely checks the status of vessels listed as 'Did not fish' based on WCPFC VMS and FFA good standing data, and will request that the relevant CCM clarify the status of vessels as needed
<u>CMM 2018-06 11</u> Requirement to report extraordinary circumstances as to why IMO or LR number is not able to be obtained	Report (RP): operational requirements for fishing vessels Where a flag CCM has not reported an IMO or LR number for a vessel that is authorised on the RFV, the Secretariat to confirm that the CCM submitted in its ARP2 information, for each CCM authorised vessel, about any extraordinary situations where a vessel owner is not able to obtain an IMO or LR number.	-AR Pt2 Statement of Implementation -Commission RFV data, WCPFC Fished and Did not fish reports	Secretariat confirms that IMO number has been reported for all CCM vessels that are authorised on the RFV
3.3 Observer-activity related requirements			
<u>CMM 2009-06 13</u> CCM shall ensure that vessels they are	Implementation (IM): Observer activity related requirement	- AR Pt2 Statement of Implementation	The Secretariat confirms that for # events (involving # receiving vessels (eg carriers) and # offloading vessels (eg longliners)) the

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
responsible for carry observers from the WCPFC ROP to observe transshipments at sea	CCM submitted a statement in AR Pt 2 that: a. confirms CCM's implementation through adoption of a national binding measure of the requirement for vessels the CCM is responsible for to carry observers from the WCPFC ROP to observe transshipments at sea. b. includes information on level of observer coverage achieved according to relevant vessel category (paragraphs 13a, 13b, or 13c of CMM 2009-06). c. describes how CCM is monitoring and ensuring that vessels it is responsible for are carrying observers from the WCPFC ROP to observe transshipments at sea; how the CCM is monitoring and ensuring it is meeting its observer coverage requirements, and how CCM responds to potential infringements or instances of non-compliance with this requirement The Secretariat confirms that the CCM reported in its high seas transshipment declarations that there was an ROP observer on board the CCM's offloading vessel or the receiving vessel.	- Summary of Commission data (high seas transshipment reports is reviewed by the Secretariat), including data fields related ROP Observer placement	CCM reported in its high seas transshipment declarations that there was an ROP observer on board the CCMs offloading vessel or the receiving vessel.
<u>CMM 2012-03 02</u> CCMs shall achieve 5% coverage of the effort of each fishery fishing for fresh fish beyond the national jurisdiction in area N 20N	Quantitative Limit (QL): Observer Coverage The CCM reported in AR Pt2 its observer coverage of effort of each fishery fishing for fresh fish beyond national jurisdiction in area N 20 N and the Secretariat can verify the CCM's reported observer coverage level and confirm that the CCM has achieved at least 5% coverage for each fishery.	- AR Pt2 Statement of Implementation - SPC prepared report of observer coverage rate achieved, based on observer data received for certain CCMs with activity in area N of 20 N, and their applicable fisheries	Based on data available to WCPFC/SPC this CCM had a fleet where some trips in RY were exclusively on the high seas north of 20N landing fresh fish. (CMM 2018-05 footnote 3: "fresh fish" means highly migratory fish stocks that are live, whole or dressed/gutted, but not further processed or frozen)
<u>CMM 2018-05 Annex C 06</u> CCMs shall achieve 5% coverage of the effort in each fishery under the jurisdiction of the Commission	Report (RP): Observer activity related requirement The Secretariat confirms receipt by the CCM in AR P1 of the required information contained in WCPFC11 reporting procedure of previous year longline observer coverage achieved using the chosen metric and in the agreed format.	- AR Pt2 AR Pt 1 CMM 2018-05 09 required report (annual) - SPC prepared report of observer coverage rate achieved, based on observer data received	Based on data available to WCPFC/SPC this CCM achieved x% ROP LL Observer coverage achieved based on data submission for its flagged PS vessels

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
	The Secretariat can verify, through ROP data received by WCPFC, that the CCM did meet the minimum observer coverage rate of 5% for its flagged, non-PS vessels		
<u>CMM 2023-01 33</u> Requirement for purse seine vessels to carry a ROP observer	Report (RP): Observer activity related requirement The Secretariat confirms receipt of a report from the CCM that its flagged purse seine vessels carried an ROP observer where that flagged purse seine vessel was fishing exclusively on the high seas, on the high seas and in waters under national jurisdiction of one or more coastal States, or in waters under the jurisdiction of two or more coastal States.	- AR Pt2 Statement of Implementation - SPC prepared report of observer coverage rate achieved, based on observer data received	Based on data available to WCPFC/SPC this CCM achieved x% ROP PS Observer coverage achieved based on data submission for its flagged PS vessels
<u>CMM 2023-01 34</u> 100% purse seine coverage: specific rules for vessels fishing exclusively in areas under its national jurisdiction	Implementation (IM): Observer activity related requirement CCM submitted a statement in AR Pt2 that: a. confirms CCM's implementation through adoption of a national binding measure of the requirement for all CCM flagged purse seine vessels to carry an observer if they are operating solely within the CCM's national jurisdiction within 20N and 20S. b. describes how CCM is monitoring and ensuring that each of its flagged PS vessels that is operating solely within its national jurisdiction is carrying an observer, and how CCM responds to potential infringements or instances of non-compliance with this requirement.	- AR Pt2 Statement of Implementation	
3.4 Catch and Effort Reporting related to Fishing Activities			
<u>CMM 2022-06 01</u> Requirement to ensure the master of each vessel completes an accurate electronic log of every day that it spends at sea on the high seas of the	Implementation (IM): Activity related requirement – catch and effort reporting CCM submitted a statement in AR Pt2 that: a. confirms CCM's implementation through adoption of a national binding measure that requires CCM vessel masters to complete an accurate written or electronic log of every day it spends at sea on the	- AR Pt2 Statement of Implementation	

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
Convention Area as specified (effective for most vessels as of 1 Jan 2024)	high seas of the Convention Area, as required by this paragraph. b. describes how CCM is monitoring and ensuring that its vessel masters complete an accurate written or electronic log of every day it spends at sea on the high seas of the Convention Area as required by this paragraph, and how CCM responds to potential infringements or instances of non-compliance with this requirement.		
<u>CMM 2022-06 02</u> Requirement that information recorded by the master of each vessel each day with fishing operations shall, at a minimum include the information as specified	Implementation (IM): Activity related requirement – catch and effort reporting CCM submitted a statement in AR Pt2 that: a. confirms CCM's implementation through adoption of a national binding measure that requires CCM vessel masters to record the minimum specified information in para 2(i-iii) of CMM 2022-06. b. describes how CCM is monitoring and ensuring that its vessel masters record the minimum specified information, and how CCM responds to potential infringements or instances of noncompliance with this requirement.	- AR Pt2 Statement of Implementation	
<u>CMM 2022-06 03</u> Requirement that the master of each vessel fishing in the Convention Area provides required information to its national authority within 15 days of the end of a trip or transshipment event	Implementation (IM): Activity related requirement – catch and effort reporting CCM submitted a statement in AR Pt2 that: a. confirms its implementation through adoption of a national binding measure that requires the master of each vessel referred to in paragraph 1 to provide the required information electronically to its national authority or its designated institution within the time frame set out in this paragraph. b. describes how CCM is monitoring and ensuring that the master of each vessel referred to in paragraph 1 provide the required information electronically to its national authority or its designated institution within the time frame set out in this paragraph and how CCM responds to potential infringements or instances of non-compliance with this requirement.	- AR Pt2 Statement of Implementation	
<u>CMM 2022-06 04</u>	Report (RP): Activity related requirement – catch and effort reporting	- AR Pt2 Statement of Implementation	Based on SPC advice related to Operational Catch and Effort Data Provision

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
Requirement to provide operational catch and effort data recorded by the master of each vessel each day with fishing operations to the Commission, and where possible in accordance with the agreed SSPs	The Secretariat confirms that CCM submitted the required information electronically (as set out in paragraph 2) by April 30 of the following year as required by Scientific Data to be provided to the Commission.	- SPC prepared report on Scientific Data submissions, including advice on completeness	
<u>CMM 2022-06 05</u> Requirement that the master of each vessel fishing in the Convention Area provides an accurate and unaltered original or copy of the required information pertaining to the current trip on board the vessel at all times during the course of a trip	Implementation (IM): Activity related requirement – catch and effort reporting CCM submitted a statement in ARPt2 that: a. confirms CCM's implementation through adoption of a national binding measure that requires CCM vessel masters to provide an accurate and unaltered original or copy of the information required under CMM 2022-06 pertaining to the current trip on board the vessel at all times during the course of a trip b. describes how CCM is monitoring and ensuring that CCM vessel masters provide an accurate and unaltered original or copy of the required information pertaining to the current trip on board the vessel at all times during the course of a trip, and how the CCM responds to potential infringements or instances of non-compliance with this requirement.	- AR Pt2 Statement of Implementation	
<u>SciData 01</u> Estimates of Annual Catches	Report (RP): Activity related requirement – annual fishing activity Assessment is in accordance with Tier-Scoring Evaluation Level: • A Tier Score of III = COMPLIANT III:=Data have been provided, there are no gaps in the data provided and the coverage of data is according to the requirements.	- SPC prepared report on Scientific Data submissions, including advice on completeness	Based on SPC advice
<u>SciData 02</u> Number of vessels active			

Obligation Brief Description	Audit Point Definition	Current dCMR data sources	Verify note in dCMR RY2024, or otherwise from dCMR RY2022 and RY2023
<u>SciData 03</u> Operational Level Catch and Effort Data	<ul style="list-style-type: none"> • A Tier Score of I or II = NON-COMPLIANT/PRIORITY <p>I:=No data are provided, or data have been provided but they have been evaluated as 'unusable' (instances where none of the data provided can be used in assessments). This level of data gap is the most severe and has by far the greatest impacts on the scientific work of the Commission.</p> <p>II:=Data have been provided, most of which can be used for the scientific work of the Commission, but (i) there are one or several (minimum-standard) data fields not provided an/or (ii) the coverage of the data is not according to the requirements. In these cases, some of the scientific work of the Commission cannot be undertaken. The % value assigned in this category represents the estimated proportion of the key attribute data provided compared to the full set of key attribute data required as stipulated in the WCPFC data submission guidelines.</p>		
<u>SciData 05</u> Size composition data			