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Approach to Aggregate Tables and Subsampling

WCPFC22-2025-29

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Submitted by the TCC Chair

Purpose

1. This paper responds to the TCC21 tasking for the TCC Chair to prepare options for an approach to subsampling of data for use in the Aggregate Tables.

Background

2. In September 2025, TCC21 requested CCMs provide feedback to the TCC Chair and the WCPFC Secretariat on the format specifications for the aggregate report, the TCC processes and the preferred subsampling approach and recommended that WCPFC22 give consideration to the approach to be taken towards the subsampling of data for use in the Aggregate Tables. ([TCC21 Provisional Outcomes](#), paragraphs 22 and 40)

Context

3. The WCPF Convention tasks the Technical and Compliance Committee (TCC) with monitoring and reviewing compliance with conservation and management measures adopted by the Commission. The process for undertaking this review is established in [CMM 2023-04](#) Conservation and Management Measure for the Compliance Monitoring Scheme (CMS CMM). This paper provides an overview of this process. For clarity, any reference to the operational provisions of the CMS refer to this [CMS CMM](#).
4. WCPFC20 adopted a revised CMS CMM that:
 - a. embeds the use of audit points;
 - b. embeds the review of outstanding (>104 weeks) cases in the Online Compliance Case File System (CCFS);
 - c. provides for discussion of anomalies identified by CCMs through review of the aggregate tables; and

- d. maintains key long-standing elements of the WCPFC CMS such as recognising and responding to capacity needs and prioritising review of key obligations.
5. CMM 2023-04 also introduced a requirement to pair the proportion of ROP data from the purse seine fishery used in the CMS to the level of ROP coverage achieved in the longline fishery (most recent year) via a random sampling mechanism to be developed by the Secretariat and the SSP to apply in TCC's review of the aggregate tables as part of the CMR.
6. The outstanding issue for fully implementing the CMS as outlined in the current CMM, is adopting a random sampling mechanism to address the imbalance in observer data that stems from the significant disparity in observer coverage between the purse seine and longline fisheries. In 2024, TCC20 did not review the aggregate tables, but did discuss the sampling methodology. In 2025, TCC21 undertook a limited review of the aggregate tables, focused only on Article 25(2) cases (sourced from HSBI etc.) and continued discussions on the sampling methodology, based on work presented by the Secretariat ([WCPFC-TCC21-2025-09](#)).
7. Building on the work undertaken last year, and feedback from TCC20 and WCPFC21, the Secretariat undertook further work on options for the sampling mechanism. This work was presented to TCC21 ([WCPFC-TCC21-2025-09](#)), and included a preferred option for the subsampling approach (*Year specific percent sampling*).

Future direction for subsampling approach

8. WCPFC-TCC21-2025-09 demonstrated three different sampling approaches. Discussions considered how representative each approach was, and concluded the year-specific percent sampling, which takes into account variations in year-to-year purse seine observer coverage, was likely the most balanced approach. However, it was also recognised in WCPFC-TCC21-2025-09 and by TCC21, that the sub-sampled data should not be used for reviews of CCM compliance with relevant CMMs, noting the need to further consider the presentation of information and the TCC process to review this information. Key points raised in discussions were:
 - a. The view that the *year-specific percent subsampling* was the preferred method of subsampling was reinforced in discussions at TCC21 with a number of CCMs indicating a preference for this option, and some CCMs further confirming this in feedback following TCC21.
 - b. There was also general support at TCC21 that it was premature to use the subsampled information for compliance review purposes, and this position was reinforced by one CCM following TCC21.
 - b. There were also discussions at TCC21 on the direction of the ROP-IWG work in relation to how cases are characterised in the CCFS and how this may affect the generation of aggregate tables in the future (which was also referenced by one CCM in its post-TCC feedback).

- c. There was a broader concern raised at TCC21 related to the amount of effort and resources expended to develop the sampling methodology and the need to consider the utility of this work.
9. At this stage, noting the discussions at TCC21 and the feedback provided by CCMs, the possible direction of the ROP-IWG work, and the broader concerns related to the utility of this work, it is important that WCPFC22 provide direction for the ongoing work to implement the CMS CMM including the development of the aggregate tables by the Secretariat and the review process at TCC.
 - a. Notwithstanding the fact that no review of the aggregated tables was undertaken at TCC20, and a limited review was undertaken at TCC21, the current CMS CMM obligates:
 - i. the Secretariat to prepare aggregated tables drawn from the case file system; and
 - ii. TCC to review the aggregate tables (paragraph 28(ii)).
 - b. Further, the CMS CMM also provides that the aggregate tables developed shall be based on a subsampling method (para 15a-c).
10. The purpose of the aggregate tables review, as articulated in the CMS CMM (paragraph 28(ii)), is to *“provide an indicator of potential anomalies in the implementation of obligations by a CCM, with a view towards identifying implementation challenges for that CCM and identifying systemic failures to take flag state action in relation to alleged violations.”*
 - a. Although implementation of the aggregate tables review has been limited and when undertaken, it has been on a trial basis, it has generated some useful discussions in relation to possible systemic issues that have reinforced other parts of the CMR process or TCC’s work more broadly. The implementation of the aggregate tables review process has also helped drive progress in improving timeliness of addressing old cases in the compliance case file system.
 - b. From the Chair’s perspective, **there is still merit in implementing the aggregate tables review process** and using this to highlight areas of concern or inform TCC’s broader work including in its implementation of the Commission’s MCS programmes. At TCC19 there was extensive discussion of the aggregate tables in relation to vessels fishing in high seas areas without authorisation. At TCC21, there was discussion in relation to an Article 25(2) case being closed without the investigation report being provided.
 - c. However, it is **unlikely that further analytical work or consultation is likely to lead to significant improvements in the sampling methodology.**
 - d. Further, the concerns that have consistently been raised in relation to the mechanics of the sampling process and the lack of agreed definitions for “potential anomalies” or “systemic failures” suggest that that **review of the aggregate tables should not be used to determine a compliance status.**
11. Note also, that while feedback was requested on the presentation format for the aggregate tables and the TCC review process, this was not discussed at TCC21 nor was any feedback provided following

TCC21 (though suggestions made by one delegation in relation to possible amendments to the case file system would have some bearing on how the aggregate tables would be presented).

12. Similarly, there was no feedback provided on the TCC process for reviewing the aggregate tables except to propose that the review of the aggregate tables should not be used to determine a compliance status.
 - a. Clear guidance previously provided by the Commission is that the identification of issues arising from the aggregate tables should be a CCM-led process – i.e. the tables are presented and CCMs raise anomalies to TCC's attention for discussion. This may be done during the CMR review process (as at TCC21) or undertaken prior to TCC (as at TCC19).

TCC Chair's recommended approach

13. Noting the issues discussed above, the TCC Chair's recommended approach for the ongoing implementation of the aggregate tables review is:
 - a. the preparation of the aggregate tables in line with paragraph 28(ii) of the CMS CMM be undertaken using the *year-specific percent sampling methodology*;**
 - b. TCC review these aggregate tables in conjunction with the Compliance Monitoring Review process to facilitate discussion of any relevant issues identified by CCMs through this process which is consistent with previous practice;**
 - c. the outcome of the review of aggregate tables will not be linked to the application of a compliance status.**
14. The implementation of the aggregate tables review process by TCC22 will need to be considered by WCPFC23 in light of the work of the ROP-IWG in 2026 and noting the expiry of the CMS CMM at the end of 2026.

Alternative approaches

15. The above recommended approach draws on the analysis presented to TCC21, the general support for the preferred sampling methodology, and concerns related to ongoing resource requirements. However, if there is concern related to the sampling methodology, WCPFC22 could task the Secretariat to further develop the sampling methodology in particular to work with SPC to address the outstanding issue to link VMS trips and observer trips, allowing implementation of the *adjusted year-specific percent sampling methodology*.
16. If there are broader concerns in relation to the implementation of the sampling methodology (or the aggregate tables process more broadly), WCPFC22 could direct TCC not to review the aggregate tables until resolved. If this option were selected, in the interest of reducing unnecessary workload, it is recommended that the Commission also direct the Secretariat not to prepare the aggregate tables.

Recommendations

14. The Commission is invited to:

a. endorse the TCC Chair's approach as set out in paragraphs 13 and 14 above:

- i. the preparation of the aggregate tables in line with paragraph 28(ii) of the CMS CMM be undertaken using the *year-specific percent sampling* methodology;
- ii. TCC review these aggregate tables in conjunction with the Compliance Monitoring Review process to facilitate discussion of any relevant issues identified by CCMs through this process which is consistent with previous practice;
- iii. the outcome of the review of aggregate tables will not be linked to the application of a compliance status; and

b. agree the implementation of the aggregate tables review process by TCC22 will need to be considered by WCPFC23 noting, the work of the ROP-IWG in 2026 and the expiry of the CMS CMM at the end of 2026.

Or, where there are concerns with the approach in paragraphs 13 and 14 above;

c. endorse one of the alternative approaches:

- i. WCPFC22 task the Secretariat to further develop the sampling methodology in particular to work with SPC to address the outstanding issue to link VMS trips and observer trips, allowing implementation of the *adjusted year-specific percent sampling* methodology (paragraph 15 above); or
- ii. Until broader concerns are resolved, WCPFC22 directs TCC not to review the aggregate tables and directs the Secretariat not to prepare the aggregate tables (paragraph 16 above).