



**REGIONAL OBSERVER PROGRAMME INTERSESSIONAL WORKING GROUP**

**Eighth Meeting**

**3 June 2026**

**Electronic meeting**

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**DRAFT SCOPE OF MONITORING FOR POTENTIAL INFRINGEMENTS FOR THE WCPFC  
COMPLIANCE CASE FILE SYSTEM CASES**

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**ROPIWG09-2026-03**

**31 May 2026**

**Submitted by the ROPIWG Chair**

**Purpose**

1. This paper proposes updates to the ROP Minimum Standard Data Fields (MSDF) to add or revise fields to better monitor newer or updated CMMs, clarify data reporting for scientific versus compliance purposes, and improve how ROP data feeds into the WCPFC Case File System (CCFS).
2. It also provides updated information on the key points from the discussion on this paper at ROPIWG08 along with some comments provided by CCMs. Other comments are anticipated to be made during the discussions at ROPIWG.
3. A paper was prepared to support ROP-IWG meeting discussions during 2025 and early 2026. The table presented provided a list of the obligations in CMMs where observers could collect data that can be used to monitor implementation of CMMs, including potential infringements. For each obligation some notes have been prepared describing what scientific monitoring needs and potential compliance issues for data collection by observers might be. Notes have also been provided about where the current MSDFs include some data collection, where CCFS cases have been created, and/or where there are proposals in ROP-IWG06 Working Paper 2 that may be relevant to the monitoring of the obligation. The list of topics presented in the Table are the following:
  - Observer Obstruction
  - Driftnet Prohibition
  - Fishing on data buoys prohibition
  - Marine Pollution
  - FAD Closure – Tropical Purse Seine
  - Seabirds
  - Sea Turtles

- Mobulid Rays
  - Sharks
  - Whale Sharks
  - Cetaceans
4. Between the ROPIWG06 meeting and the ROPIWG07 meeting before TCC21, and for ROPWG08, the United States submitted a delegation paper, including a table integrating and summarising the ROP-IWG's work on identifying and classifying updated MSDFs as shown in Annex 1.
  5. The ROPIWG Chairs working table providing details of proposed updates to MSDF along with information on the extent to which they are reported (and the associated MSDF) are in Annex 2 to support clarity of the proposals for changes to MSDF.
  6. On the basis of discussions to date, the following table reflects a summary of the main points for specific MSDF raised in discussions to facilitate discussions at ROPIWG09 to confirm changes to recommend to TCC22.

## Approach to summary of obligations considered during ROP-IWG08 and in feedback from CCMs since that meeting

Binding but requires discussion to confirm scope			Possible treatment
These obligations are in the high-level list and detailed table. Comments show the scope or monitoring pathway for discussion.			Based on summary of ROP-IWG discussions and feedback on the two tables in the "Scope of monitoring for CCFS cases" paper
NOTE: New GEN-3 yes/no questions across SSI and technical obligations. Cross-cutting issue: whether these should be added to the Observer Trip Monitoring Summary, addressed through debriefing, or covered by existing PS-3 / set-level / SSI fields.			
Topic	Obligation	Issue for discussion	
Fishing on data bouys	CMM 2009-05 05	Included in both tables, but questioned as potentially CCM-level rather than observer-level.	Observer-level or CCM-level?
Seabirds	CMM 2018-03 06/2025-05 07	Included in both tables, but questioned as to whether it is practical for observers to collect/verify the required information.	Discuss practicality of observer verification
Mobulids	CMM 2019-05 06	Included in the high-level mobulid ray grouping, PNA suggests omitting because it is not monitored by observers.	Exclude or retain?
Mobulids	CMM 2019-05 10	Included in the high-level mobulid ray grouping, but the detailed table suggests paragraph 10 may be better treated as observer obstruction, and some elements may not be observer-verifiable.	Is this observer-verifiable and suitable for CCFS monitoring? Could be removed and treated as observer obstruction. Not clear support in the detailed comments as a practical observer-sourced CCFS obligation.

<b>Sharks</b>	<b>CMM 2024-05 08 and 09 (now 2025-06)</b>	Included in shark grouping, PNA suggests these are CCM-level obligations. Others see as feasible to monitor	<b>Discuss whether to exclude as CCM-level obligations.</b>
<b>Sharks</b>	<b>CMM 2024-05 14 (now 2025-06)</b>	Binding, but PNA suggests it is not feasible for observers to report on or collect these data. Others see as feasible to monitor	<b>Exclude or retain?</b>
<b>Sharks</b>	<b>CMM 2024-05 15 (now 2025-06)</b>	Binding, but PNA suggests it is not feasible for observers to report on or collect these data; may be better linked to inspection or transshipment monitoring. Others see as feasible to monitor	<b>Discuss whether to exclude from observer-sourced CCFS monitoring or address through inspection/transshipment monitoring.</b> This obligation may not be practical for routine observer verification.
<b>Oceanic whitetip and Silky sharks</b>	<b>CMM 2024-05 24(3) (now 2025-06)</b>	Included in the high-level shark grouping, PNA supports 24(1)-(2)	<b>Exclude or retain?</b>
<b>Whale sharks</b>	<b>CMM 2024-05 25(3), 25(4), 25(6), 25(7) (now 2025-06)</b>	Included in the high-level whale shark grouping, PNA suggests omitting the others as not practical for observers to collect.	<b>Exclude or retain?</b>
<b>Marine Pollution</b>	<b>CMM 2017-04 03 and 05</b>	Non-binding / encouragement language. The first table notes it, but the detailed table records PNA's - should be omitted because of its non-binding language. Others wish to retain pending outcome of the review of CMM 2017-02	Retain at this time pending confirmation of data field requirements as part of the CMM review currently underway?

Common to both tables – confirm retention based on discussions at past meetings		
Topic		Obligations
Observer obstruction	CMM 2018-05 15(g)	<b>Retain.</b> Existing RS-A, RS-B and RS-D fields support observer obstruction monitoring.
Mobulids	CMM 2019-05 03-05 and 08	<b>Retain.</b> These relate to targeted fishing / intentional setting and prohibitions on retention, transshipment, storing or landing. Already captured by observers.
Driftnet Prohibition	CMM 2008-04 paragraph 2	<b>Retain.</b> The obligation is binding and appears on both tables. Discussion may still be needed on whether it requires a new yes/no field or remains diary/debriefing based.
Fishing on data bouys	CMM 2009-05 01 and 03	<b>Retain.</b> These are binding obligations relating to fishing within 1 nautical mile of, or interacting with, data buoys.
Sharks	CMM 2024-05 07 (now 2025-06)	<b>Retain.</b> Already monitored by observers
Sharks	CMM 2024-05 18 (now 2025-06)	<b>Retain.</b> This relates to shark mitigation requirements in longline fisheries between 20N and 20S, subject to confirming MSDF coverage.
Sharks	CMM 2024-05 21 (now 2025-06)	<b>Retain.</b> This relates to hauling non-retained sharks alongside for species identification when possible.
Oceanic whitetip and Silky sharks	CMM 2024-05 24 (1)-(2) (now 2025-06)	Retain. PNA supports
Whale sharks	CMM 2024-05 25 (1)-(2) and 25 (5) (a) (now 2025-06)	Retain. PNA supports

<b>Driftnet Prohibition</b>	<b>CMM 2008-04 paragraph 2</b>	<b>Retain.</b> The obligation is binding and appears in both tables. Discussion may still be needed on whether it requires a new yes/no field or remains diary/debriefing based.
<b>Marine Pollution</b>	<b>CMM 2017-04 paragraph 2</b>	<b>Retain.</b> Existing PNA reporting supports monitoring of plastic discharge.
<b>FAD Closure – Tropical Purse Seine</b>	<b>CMM 2023-01 paragraphs 13 and 14</b>	<b>Retain.</b> Existing set association and location fields support monitoring, with Secretariat review against CCM notifications as needed.
<b>Seabirds</b>	<b>CMM 2018-03 paragraphs 1 and 2</b>	<b>Retain.</b> These appear in both tables and are binding mitigation requirements.
<b>Sea Turtles</b>	<b>CMM 2018-04 paragraphs 4, 6 and 7(a)-(b)</b>	<b>Retain.</b> These appear in both tables and relate to mitigation, handling, equipment and shallow-set longline requirements.
<b>Cetaceans</b>	<b>CMM 2024-07 paragraphs 1, 2, 3 and 4</b>	<b>Retain.</b> These relate to purse seine setting, unintentional encircling, retention / transshipment / landing prohibitions, and longline release requirements.

## ANNEX 1

### 7. Summary of Obligations and Proposed Case Type Identifiers for Observer-sourced CCFS Cases<sup>1</sup>

Type	Description	Relevant CMMs
<b>POL</b> (same as current)	Marine Pollution ( <i>including required prohibition on vessel discharge any non-fishing gear plastics and encouragements to CCMs regarding additional marine pollution measures and reporting of gear loss</i> )	<a href="#">CMM 2017-04</a> (for Marine Pollution; eff. 01 Jan 2019 - Current) - <a href="#">CMM 2017-04 02</a> - <del><a href="#">CMM 2017-04 05</a></del> <sup>2</sup>
<b>FAD</b> (currently “FAI”)	Fishing on Data Buoys ( <i>including prohibition on fishing within 1 nautical mile or interacting with data buoys on the high seas and adherence to various requirements in the case of entanglement</i> ) and FAD closures for Tropical Purse Seine Vessels ( <i>including prohibition on setting on FADs in EEZ waters or high seas of the Convention Area during the 1.5-month FAD closure and for one additional month of FAD Closure period that the Flag State has chosen</i> )	<a href="#">CMM 2023-01</a> (for Bigeye, Yellowfin and Skipjack Tuna in the Western & Central Pacific Ocean; eff. 06 Feb 2024 - Current) - <a href="#">CMM 2023-01 13</a> - <a href="#">CMM 2023-01 14</a>  <a href="#">CMM 2009-05</a> (Prohibiting Fishing on Data Buoys; eff. 09 Feb 2010 - Current) - <a href="#">CMM 2009-05 01, 03, 05</a>
<b>CWS</b> (same as current)	Interactions with Cetaceans ( <i>including prohibition on purse seine (“PS”) setting on cetaceans if animal is sighted prior to commencement of the set; requirements in the event of unintentional circling of cetaceans in the PS net, including incident reporting; the prohibition on all vessels (PS and longline (“LL”)) from harvesting, retaining onboard, transshipping, or landing any cetacean, in whole or any part thereof, in the Convention Area; and the requirement that LL vessels release, taking into account the safety of the crew, any cetacean that is caught or entangled by its fishing gear in the Convention Area as soon as possible and in a manner that results in as little harm to the cetacean as possible and utilizing the Best Practices for the Safe Handling and Release of Cetaceans, if possible</i> ); and Interactions with Whale Sharks ( <i>including prohibition on PS setting on whale sharks and on retention/ transshipment</i> )	<b>Cetaceans:</b> <a href="#">CMM 2024-07</a> (for Protection of Cetaceans from PS & LL Fishing Operations; eff. 01 July - Current) - <a href="#">CMM 2024-07 01-04</a> <sup>3</sup>  <b>Whale Sharks:</b> <a href="#">CMM 2024-05</a> (for Sharks; eff. 01 Feb 2025 - Current). - <a href="#">CMM 2024-05 25 (01-07)</a> <sup>4</sup>

<sup>1</sup> The Case Types described here are not listed by how the alleged infringement is identified in observer data, as clarification of that process is forthcoming. See WCPFC-ROP-IWG05-2025-04 (ROP-IWG workplan).

<sup>2</sup> The U.S. agrees with ROP-IWG’s recommendation but notes that paragraph 05 is only an *encouragement*.

<sup>3</sup> The ROP-IWG identified the obligations in CMM 2024-07, which superseded CMM 2011-03. The relevant obligations are described in: CMM 2011-03 01, CMM 2011-03 02, CMM 2011-03 03, and CMM 2011-03 05.

<sup>4</sup> CMM 2024-05 supersedes CMM 2022-04, CMM 2019-04 (Sharks), and CMM 2012-04 (Whale Sharks).

Type	Description	Relevant CMMs
<b>OBS</b> (currently “OAI”)	Observer Obstruction	<a href="#">CMM 2018-05</a> (for the ROP; eff. 12 Feb 2019 - Current) - <a href="#">CMM 2018-05 15(g)</a>
<b>DNS</b> (NEW)	Driftnet regulations ( <i>including prohibition on the use of large-scale driftnets on the high seas</i> )	<a href="#">CMM 2008-04</a> (to Prohibit the Use of Large Scale Driftnets on the High Seas of the Convention Area; eff. 10 Feb 2009 - Current) - <a href="#">CMM 2008-04 02</a>
<b>SHK</b> (same as current)	Shark Catch ( <i>including prohibitions on shark finning (including transshipment of fins), retention on board of sharks (including for crew consumption), provisions intended to minimize bycatch of sharks in certain LL fisheries, the preference for hauling non-retained sharks alongside for species identification, and various requirements related to Silky Sharks and Oceanic White Tip sharks specifically, among others</i> )	<a href="#">CMM 2024-05</a> (for Sharks; eff. 01 Feb 2025 - Current). <sup>5</sup> - <a href="#">CMM 2024-05 07-09</a> - <a href="#">CMM 2024-05 14</a> - <a href="#">CMM 2024-05 15</a> - <a href="#">CMM 2024-05 18</a> - <a href="#">CMM 2024-05 21</a> - <a href="#">CMM 2024-05 24 (01-03)</a>
<b>RAY</b> (NEW)	Mobulid Rays ( <i>including prohibitions on the retention, transshipment, storing, or landing of mobulid rays, as well as the targeted fishing or intentional setting on them</i> )	<a href="#">CMM 2019-05</a> (for Mobulid Rays caught in association with fisheries in the WCPFC Convention Area; eff. 01 Jan 2021 - Current). - <a href="#">CMM 2019-05 (04-06, 08, 10)</a> - <a href="#">CMM 2019-05 03</a>
<b>TUR</b> (NEW)	Sea Turtles ( <i>including CMMs ensuring that fishermen use proper mitigation and handling techniques and foster the recovery of any incidentally captured turtles before returning them to the water, requiring LL vessels to carry and use certain equipment for the prompt handling and release of incidental bycatch, and imposing mitigation requirements for shallow-set LL vessels</i> )	<a href="#">CMM 2018-04</a> (of Sea Turtles; eff. 01 Jan 2020 - Current). - <a href="#">CMM 2018-04 04</a> - <a href="#">CMM 2018-04 06</a> - <a href="#">CMM 2018-04 07 (a, b)</a>
<b>BIR</b> (NEW)	Seabirds ( <i>including: Required longline mitigation measures to reduce incidental catch of seabirds applying north of 23N or south of 25S. 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-30°S iii. 24m or more in overall length, to use at least two mitigation measures in paragraph 6, Table 1; and</i>	<a href="#">CMM 2018-03</a> (to mitigate the impact of fishing for highly migratory fish stocks on seabirds; eff. 12 Feb 2019 - Current) - <a href="#">CMM 2018-03 01, 02, 06</a>

<sup>5</sup> [CMM 2010-07 \(Sharks\)](#) and [CMM 2013-08 \(Silky Sharks\)](#) were superseded by [CMM 2019-04 \(Sharks\)](#), and subsequently by [CMM 2022-04 \(Sharks\)](#), and [CMM 2024-05 \(eff. 01 Feb 2025 - Current\)](#). Although [CMM 2011-04 \(Oceanic Whitetip Sharks\)](#) was effective until 01 Nov 2020 and does not appear to have been superseded, paragraph 24 of the currently effective [CMM 2024-05](#) includes specific requirements to protect these species.



Type	Description	Relevant CMMs
	<i>including at least one from Column A when fishing north of 23°N iv. less than 24m in overall length, to use at least one of the mitigation measures from Column A in Table 1, when fishing north of 23°N)</i>	

ANNEX 2				
Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	ALTERNATIVE OR SUPPLEMENTARY COMMENTS
<b>OBSERVER OBSTRUCTION</b>				
<a href="#">CMM 2018-05 15 (g)</a> Observer Obstruction Incidents  PNA <sup>6</sup> supports maintaining this paragraph	n/a	vessel operator or any crew member assaulted, obstructed, resisted, delayed, refused boarding to, intimidated or interfered with an observer in the performance of their duties vessel operator or any crew member requested that an event not be reported by the observer vessel operator failed to provide the observer, while on board the vessel, at no expense to the observer or the observer's government, with food, accommodation and medical facilities of a reasonable standard equivalent to those normally available and medical facilities of a reasonable standard equivalent to those	<b>Current MSDF</b> - Observer Trip Monitoring Summary Issue Code (RS-A, RS-B and RS-D); (Yes No) –  <b>Current CCFS OAI</b> cases are created based on Observer Trip Monitoring Summary data	<b>Secretariat comment:</b> <i>No change to questions needed - could consider including some summary comment on the Observer Trip Monitoring Summary</i>  PNA supports suggestion for a summary comment

<sup>6</sup> PNA members including Tokelau and Vanuatu

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Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	ALTERNATIVE OR SUPPLEMENTARY COMMENTS
		normally available to an officer on board the vessel		
DRIFTNET PROHIBITION				
<a href="#">CMM 2008-04 02</a> Prohibit use of large-scale driftnets on the high seas  PNA supports maintaining	n/a	vessel had on board and/or deployed large-scale driftnet in high seas of Convention Area	Currently covered in training of Pacific Island Observer Programmes, with instructions to include in the observer diary/report	<b>Secretariat comment:</b> Could be a new yes no question on Observer Trip Monitoring Summary, with summary comment  <u>PNA comment: Suggest leaving it out and keep it for debriefing process as no high impact on it at the moment</u>
FISHING ON DATA BUOYS PROHIBITION				
<a href="#">CMM 2009-05 01, 03, 05</a> Prohibit their fishing vessels from fishing within 1 nautical mile of or interacting with a data buoy in the high seas, and implement requirements in the case of entanglement  PNA support to maintain para 01 and 03 but question mark about para 05 if it is observer level or CCM level	n/a	vessel had a gear entanglement with a data buoy, or intentionally interacted with a data buoy, including intentional taking on board	Currently covered in training of Pacific Island Observer Programmes, with instructions to include in the observer diary/report	<b>Secretariat comment:</b> Could be a new yes no question on Observer Trip Monitoring Summary, with summary comment  <u>PNA comment: Suggest leaving it out and keep it for debriefing process</u>

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obligation				
MARINE POLLUTION				
<a href="#">CMM 2017-04 02</a> Prohibit fishing vessels from discharging any plastics (including plastic packaging, items containing plastic and polystyrene) but not including fishing gear  PNA support to maintain	n/a	vessel discharged plastics (including plastic packaging, items containing plastic and polystyrene)	<b>current MSDF</b> - Observer Trip Monitoring Summary Issue Code (PN-A) dispose of any metals, plastics, old fishing gear or chemicals;(Yes No)  <b>Current CCFS POL</b> cases are created based on Observer Trip Monitoring Summary data  Currently there are some additional data collections by Pacific Island Observer Programmes, with instructions to include in the observer diary/report	<b>Secretariat comment:</b> <i>Could be a revised yes no question on Observer Trip Monitoring Summary, and would be useful to also collect some data fields related to the scale and how the discharge occurred</i>  PNA comment: <u>only PN-a MSDF is useful for CCFS</u>
<a href="#">CMM 2017-04 05</a> Encourage additional marine pollution measures and reporting gear loss  PNA suggest omitting para 05 because of its non-binding language	n/a	compliance issues would depend on national requirements	<b>Current MSDF</b> - Observer Trip Monitoring Summary Issue Code (PN-C, D, E) lose any fishing gear; (Yes No) , abandon any gear; (Yes No), fail to report any abandoned gear; (Yes No)	<b>Secretariat comment:</b> <i>Maybe potentially useful to collect information about how crew may attempt to retrieve abandoned, lost or discarded fishing gear (ALDFG) and retain the</i>

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			Current CCFS POL cases are created based on Observer Trip Monitoring Summary data	material on board, separate from other waste for discharge to port reception facilities.  <i><u>PNA comment: About the Secretariat comment to be useful for Observers to collect information about how crew may attempt to retrieve ALDFG is best left for CCMs reporting and not useful for CCFS purposes.</u></i>
<b>FAD CLOSURE - TROPICAL PURSE SEINE</b>				
<a href="#">CMM 2023-01 13</a> Setting on FADs in EEZ waters or high seas of Convention Area during the 1 1/2-month FAD Closure (previous CMMs had 3 Month FAD closure)  <i>PNA supports maintaining</i>	types of FAD sets - free school, logs or associated	was observed to have made an associated set in a location and during a period, when the said vessel was not expected through the provisions of the TT CMM to be permitted to set on FADs	<b>Current MSDF</b> - Type of school association (row 143), Latitude and longitude of activity (row 136)  <b>Current CCFS FAI</b> cases are created by Secretariat based on current MSDF fields referred to above, and taking into consideration CCMs notified information to the Secretariat	<b>Secretariat comment:</b> No change - some closer review by the Secretariat of the ROP data and specific circumstances would still be necessary, because there is information that CCMs notify the Secretariat, which is reported annually in reports. This information shouldn't need to be made available to Observers before they depart on their

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				<p>trip or during debriefing. For example, the CMM 2023-01 13 footnote 1 notifications</p> <p><u><i>PNA comment: Suggest that it be made available publicly on the website and circulate widely to Observer providers so observer can be advised during placement</i></u></p>
<p><a href="#">CMM 2023-01 14</a> Setting on FADs in high seas of Convention Area during the one additional month FAD Closure period that the Flag State has chosen (previous CMMs had two-month choice)</p> <p><i>PNA supports maintaining</i></p>	types of FAD sets - free school, logs or associated, and location of set is high seas of Convention Area	was observed to have made an associated set in a location and during a period, when the said vessel was not expected through the provisions of the TT CMM to be permitted to set on FADs	<p><b>Current MSDF</b> - Type of school association (row 143), Latitude and longitude of activity (row 136)</p> <p><b>Current CCFS FAI</b> cases are created by Secretariat based on current MSDF fields referred to above, and taking into consideration CCMs notified information to the Secretariat</p>	<p><b>Secretariat comment:</b> No change - some closer review by the Secretariat of the ROP data and specific circumstances would still be necessary, because there is information CCMs notify the Secretariat, which is reported annually in reports. This information shouldn't need to be made available to Observers before they depart on their trip or during debriefing. For example the selection of IATTC/WCPFC overlap</p>

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Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	ALTERNATIVE OR SUPPLEMENTARY COMMENTS
				choice, CNM participatory rights annual decision
SEABIRDS				
<p><a href="#">CMM 2018-03 01, 02, 06</a> Required longline mitigation measures to reduce incidental catch of seabirds applying north of 23°N or south of 25°S.</p> <p>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-30°S iii. 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 when fishing north of 23°N iv. less than 24m in overall length, to use at least one of the mitigation measures from Column A in Table 1, when fishing north of 23°N</p> <p>PNA supports maintaining para 01 and 02 but have a question mark around</p>		<p>Were mitigation measures used</p> <p>What mitigation measures were used</p> <p>Did mitigation measures meet the gear specification requirements</p> <p><i>(Observer may not know what combination of mitigation measures that the vessel is required to use by the flag CCM so would document observations of the mitigation measure use and whether they meet the requirements)</i></p>	<p><b>Current MSDF</b> - tori line (row 62), deep setting line shooter (row 73), blue dyed baid (row 71), management of offal (row 74), strategic offal disposal (row 75)</p> <p><b>NZ suggested additional MSDFs</b> - hook shielding devices (row 61), tori line condition (row 63), length of tori line (row 64), streamers on tori lines (row 65), tori line aerial extent (row 66), weighted branch lines (set level) (row 69), time of nautical dawn - for night setting (row 77), night setting (row 78)</p>	<p><b>Secretariat comment:</b></p> <p><i>Could be a yes no question on Observer Trip Monitoring Summary on whether mitigation measures were used</i></p> <p><i>Would be useful to also collect some data to inform whether any attempts were made to use mitigation devices.</i></p> <p><i>Some closer review by the Secretariat of the ROP data fields and specific circumstances might still be necessary, because there is information CCMs notify the Secretariat, which is reported annually in reports. This information shouldn't need to be made available to Observers before they depart on their</i></p>

ANNEX 2				
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paragraph 06 on whether it is practical for observers to collect the information require				trip or during debriefing.
	Were there interactions with seabird and if so what seabirds, nature of interaction and fate of seabird		<p><b>Interactions</b></p> <p><b>Current MSDF</b> - type of interaction (row 154), data and time of interaction (row 155), latitude and longitude of interaction (row 156), species code of marine reptile, marine mammal, or seabird (row 158), vessels activity during interaction (row 169), condition observed at start of interaction (row 170), condition observed at end of interaction (row 171), description of interaction (row 174), number of animals sighted (row 175)</p> <p><b>New proposed MSDF</b> data fields - Time of SSI first sighting with time recorded before or after Set time (row 157), SSI is incidentally encircled in the purse seine</p>	



ANNEX 2				
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			net (row 172), if SSI is caught by longline, what is the length of line on released live animal (longline caught) (row 173)	
SEA TURTLES				
<p><a href="#">CMM 2018-04 04</a> CCMs to ensure fishermen use proper mitigation and handling techniques and foster the recovery of any turtles that are incidentally captured - fishers on its flagged vessels to bring aboard, if practicable, any captured hard-shell sea turtle that is comatose or inactive as soon as possible and foster its recovery, including giving it resuscitation, before returning it to the water, use proper mitigation and handling techniques as described in WCPFC guidelines</p> <p>PNA supports maintaining para 04</p>	Were there interactions with sea turtles and if so what sea turtles, nature of interaction and fate of sea turtle	Were mitigation measures used What mitigation measures were used Did mitigation measures meet the gear specification requirements	<p><b>Interactions</b> <b>Current MSDF</b> - species code (row 127) and Fate Code (row 127) indicating retained, condition when caught (row 105), fate (row 106), condition when released (row 107), type of interaction (row 154), data and time of interaction (row 155), latitude and longitude of interaction (row 156), species code of marine reptile, marine mammal, or seabird (row 158), vessels activity during interaction (row 169), condition observed at start of interaction (row 170), condition observed at end of interaction (row 171),</p>	<p><b>Secretariat comment:</b> <i>Could be a new yes no question on Observer Trip Monitoring Summary as to whether the vessel had any interactions with sea turtles that are documented. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific mitigation measure use, and safe handling practices</i></p> <p><b><u>PNA comment: PS-3 already capture SSI sighting and encirclement data for purse seine and support that additional Yes/No</u></b></p>

ANNEX 2				
Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	ALTERNATIVE OR SUPPLEMENTARY COMMENTS
			<p>description of interaction (row 174), number of animals sighted (row 175)</p> <p><b>New proposed MSDF data fields</b> - Time of SSI first sighting with time recorded before or after Set time (row 157), SSI is incidentally encircled in the purse seine net (row 172), if SSI is caught by longline, what is the length of line on released live animal (longline caught) (row 173)</p>	<p><u>question on the GEN3 maybe taken up during debriefing to minimize at-sea workload</u></p>
<p><a href="#">CMM 2018-04 06</a> CCMs to require longline vessels to carry and use line cutters and de-hookers to handle and promptly release sea turtles, as well as dip-nets where appropriate</p> <p>PNA supports maintaining</p>		<p>Were mitigation measures used</p> <p>What mitigation measures were used</p> <p>Did mitigation measures meet the gear specification requirements</p>		<p><b>Secretariat comment:</b></p> <p><i>Could be a new yes no question on Observer Trip Monitoring Summary as to whether the vessel carries and uses line cutters and de-hookers for sea turtles, as well as dip-nets. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to use of these</i></p>

ANNEX 2				
Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	ALTERNATIVE OR SUPPLEMENTARY COMMENTS
				<i>mitigation measures during specific incidents</i>
<p><a href="#">CMM 2018-04 07 (a, b)</a> Sea Turtle mitigation requirements for shallow-set longline vessels - LL vessels to employ at least one of the three mitigation methods listed in paragraph 7a of the CMM - i. Use only large circle hooks, which are fishing hooks that are generally circular or oval in shape and originally designed and manufactured so that the point is turned perpendicularly back to the shank. These hooks shall have an offset not to exceed 10 degrees. ii. Use only finfish for bait. or iii. other Commission approved mitigation measure/plan</p> <p>PNA supports maintaining</p>		<p>Were mitigation measures used</p> <p>What mitigation measures were used</p> <p>Did mitigation measures meet the gear specification requirements</p>	<p><b>Current MSDF</b> - hook type (row 59), hook size (row 60), bait species (row 92), target species (row 91)</p>	<p><b>Secretariat comment:</b>  <i>Could be a new yes no question on Observer Trip Monitoring Summary if vessel is fishing in shallow-set manner, whether mitigation measures were used. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific mitigation measure use.</i></p> <p><i>Some closer review by the Secretariat of the ROP data fields and specific circumstances might still be necessary, because there is information CCMs notify the Secretariat, which is reported annually in reports. This information shouldn't need to be made available to Observers</i></p>

ANNEX 2				
Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	ALTERNATIVE OR SUPPLEMENTARY COMMENTS
				<i>before they depart on their trip or during debriefing.</i>
MOBULID RAYS				
<p><a href="#">CMM 2019-05 (04-06, 08, 10)</a> Prohibit retaining/transshipping/storing/landing mobulid rays</p> <p>PNA supports maintaining paragraph 03-05, para 06 is suggested to be omitted because it is not monitored by observers and paragraph 10 can be considered as obstruction under ROP CMM</p>		Were mobulids landed on board and retained, were mobulids transshipped	<p>Check that there are some observed fate codes that indicate retention in whole or in part for SSI</p>	<p><b>Secretariat comment:</b>  <i>Could be a new yes no question on Observer Trip Monitoring Summary related to whether retention or transshipping was observed. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific incidents, including fate of SSIs</i></p> <p><b>PNA comment:</b> <i>PS-3 already capture SSI sighting and encirclement data for purse seine and support that additional Yes/No question on the GEN3 maybe taken up during debriefing to minimize at-sea workload</i></p>
<a href="#">CMM 2019-05 03</a> Prohibit targeted fishing or intentional setting on	Were there interactions with	Was purse seine gear deployed or continue to be	<p><b>Interactions</b>  <b>Current MSDF</b> - species</p>	<p><b>Secretariat comment:</b>  <i>Could be a new yes no</i></p>

ANNEX 2				
Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	ALTERNATIVE OR SUPPLEMENTARY COMMENTS
mobulid rays	mobulids - seen from the vessel and if so what mobulids, nature of interaction and fate of mobulids	deployed while one or more mobulids were in the vicinity of the gear being released	code (row 127) and Fate Code (row 127) indicating retained, condition when caught (row 105), fate (row 106), condition when released (row 107), type of interaction (row 154), data and time of interaction (row 155), latitude and longitude of interaction (row 156), species code of marine reptile, marine mammal, or seabird (row 158), vessels activity during interaction (row 169), condition observed at start of interaction (row 170), condition observed at end of interaction (row 171), description of interaction (row 174), number of animals sighted (row 175)  <b>New proposed MSDF data fields</b> - Time of SSI first sighting with time recorded before or after Set time (row 157), SSI is incidentally	<i>question on Observer Trip Monitoring Summary related to whether intentional setting was observed. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific incidents</i>  <i><b>PNA comment: PS-3</b> <u>already capture SSI sighting and encirclement data for purse seine and support that additional Yes/No question on the GEN3 maybe taken up during debriefing to minimize at-sea workload</u></i>

ANNEX 2				
Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	ALTERNATIVE OR SUPPLEMENTARY COMMENTS
			encircled in the purse seine net (row 172)	
SHARKS				
<p><a href="#">CMM 2024-05 07-09</a> Take measures to ensure full utilization of sharks and prohibition of finning</p> <p>PNA agree to maintain paragraph 07 as it is monitored by observers and suggest omitting paragraph 8-9 as it is a CCM level obligation.</p>	were there catches of sharks, and what species, what catches were released/retained, what was their condition if released	Did vessel follow requirements to store carcasses and corresponding fins correctly, so that inspectors and observers can verify	<p><b>Current MSDF</b> - species code (row 127) and Fate Code (row 127) indicating retained and fining activity, condition when caught (row 105), fate (row 106), indicating retained and fining activity, estimated shark fin weight by species (row 162), estimated carcass weight by species (row 163)</p> <p><b>New proposed MSDF</b> - method used to store shark fins (row 164)</p> <p><b>Current CCFS SHK</b> potential shark finning cases are created by Secretariat based on current MSDF fields referred to above</p>	<p><b>Secretariat comment:</b>  <i>Could be a new yes no question on Observer Trip Monitoring Summary related to whether vessel had in place measures to ensure individual shark carcasses and their corresponding fins can be easily identified onboard the vessel at any time. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific incidents</i></p>
<a href="#">CMM 2024-05 14</a> Prevent fishing vessels from retaining on board (including for crew consumption),				<p><b>Secretariat comment:</b>  <i>Could be a new yes no question on Observer Trip</i></p>

ANNEX 2				
Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	ALTERNATIVE OR SUPPLEMENTARY COMMENTS
transshipping and landing any fins harvested in contravention  PNA suggest that this paragraph is not feasible for observer to report on or collect those data and suggest omitting				<i>Monitoring Summary related to whether crew consumed any shark fins. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific incidents,</i>
<a href="#">CMM 2024-05 15</a> Ensure carcasses and corresponding fins are landed or transshipped together  PNA suggest that this paragraph is not feasible for observer to report on or collect those data and suggest omitting		Did vessel follow requirements to during transshipment and landing to ensure carcasses and corresponding fins were together		<b>Secretariat comment:</b> <i>Could be a new yes no question on Observer Trip Monitoring Summary related to whether vessel transshipped or landed any sharks. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific incidents, including whether the carcasses and corresponding fins were landed or transshipped together</i>
<a href="#">CMM 2024-05 18</a> Minimize bycatch of sharks in longline fisheries between 20N and 20S i. prohibits its flagged		Were mitigation measures used What mitigation measures	<b>Current MSDF</b> - target species (row 91), shark lines (row 70), wire trace	<b>Secretariat comment:</b> <i>Could be a new yes no question on Observer Trip</i>

ANNEX 2				
Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	ALTERNATIVE OR SUPPLEMENTARY COMMENTS
<p>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 using shark lines or branch lines running directly off of the longline floats or drop lines</p> <p>PNA supports maintaining</p>		<p>were used</p> <p>Did mitigation measures meet the gear specification requirements</p>	(row 53)	<p><i>Monitoring Summary if vessel is fishing for tuna and billfish, whether shark mitigation measures were used. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific mitigation measure use</i></p> <p><i>Some closer review by the Secretariat of the ROP data fields and specific circumstances might still be necessary, because there is information CCMs notify the Secretariat, which is reported annually in reports. This information shouldn't need to be made available to Observers before they depart on their trip or during debriefing.</i></p>
<a href="#">CMM 2024-05 21</a> Haul non-retained sharks alongside for species				<b>Secretariat comment:</b> <i>Could be a new yes no</i>



ANNEX 2				
Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	ALTERNATIVE OR SUPPLEMENTARY COMMENTS
<p>identification when possible</p> <p>PNA supports maintaining</p>				<p><i>question on Observer Trip Monitoring Summary related to whether vessel did not haul any sharks that are caught alongside the vessel before being cut free to facilitate species ID. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific incidents, including fate of SSLs</i></p>
<p><a href="#">CMM 2024-05 24 (01-03)</a> Specific requirements to protect oceanic whitetip and silky sharks</p> <p>PNA supports maintaining sub-paragraph 1-2 and omitting sub-paragraph 03</p>	<p>Were there interactions with oceanic whitetip sharks and silky sharks - if so what shark species, nature of interaction and fate of sharks</p>	<p>Were OCS or FAL landed on board and retained, were OCS or FAL transshipped</p>	<p><b>Current MSDF</b> - species code (row 127) and Fate Code (row 127) indicating retained, condition when caught (row 105), fate (row 106), condition when released (row 107)</p> <p><b>Current CCFS SHK</b> cases related to potential retention of OCS and FAL are created by Secretariat based on current MSDF fields referred to above</p>	<p><b>Secretariat comment:</b>  <i>Could be a new yes no question on Observer Trip Monitoring Summary related to whether vessel caught any OCS or FAL, and whether the vessel retained any OCS or FAL. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific incidents, including fate of</i></p>

ANNEX 2				
Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	ALTERNATIVE OR SUPPLEMENTARY COMMENTS
				SSIs
WHALE SHARKS				
<p><a href="#">CMM 2024-05 25 (01-07)</a> Prohibit purse seine setting on whale sharks and retention/transshipment</p> <p>PNA supports maintaining sub-paragraph 1-2 and 5a and suggest omitting sub-paragraph 3, 4, 6, and 7 as it is not practical for observers to collect</p>	Report on interactions with whale sharks that were seen from the vessels -	<p>Was purse seine gear deployed or continue to be deployed while one or more whale sharks were in the vicinity of the gear being released</p> <p>Were whale sharks landed on board and retained</p>	<p><b>Interactions</b></p> <p><b>Current MSDF</b> - species code (row 127) and Fate Code (row 127) indicating retained, condition when caught (row 105), fate (row 106), condition when released (row 107), type of interaction (row 154), data and time of interaction (row 155), latitude and longitude of interaction (row 156), species code of marine reptile, marine mammal, or seabird (row 158), vessels activity during interaction (row 169), condition observed at start of interaction (row 170), condition observed at end of interaction (row 171), description of interaction (row 174), number of animals sighted (row 175)</p> <p><b>New proposed MSDF data</b></p>	<p><b>Secretariat comment:</b></p> <p><i>Could be a new yes no question on Observer Trip Monitoring Summary related to whether intentional setting on whale sharks was observed. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific incidents, including fate of SSIs</i></p> <p><b>PNA comment:</b> <u>PS-3 already capture SSI sighting and encirclement data for purse seine and support that additional Yes/No question on the GEN3 maybe taken up during debriefing to minimize at-sea workload</u></p>

ANNEX 2				
Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	ALTERNATIVE OR SUPPLEMENTARY COMMENTS
			<p><b>fields</b> - Time of SSI first sighting with time recorded before or after Set time (row 157), SSI is incidentally encircled in the purse seine net (row 172), if SSI is caught by longline, what is the length of line on released live animal (longline caught) (row 173)</p> <p><i>Check that there are some observed fate codes indicates retention in whole or in part for SSI</i></p> <p><b>Current CCFS CWS interactions</b> with purse seine and whale sharks are created by Secretariat based on current MSDF fields referred to above</p>	
<b>CETACEANS</b>				
<b>CMM 2024-07 01</b> Prohibit purse seine setting on cetaceans, if animal is sighted prior to commencement of the set	Report on interactions with cetaceans that were seen from the vessels -	Was purse seine gear deployed or continue to be deployed while one or more cetaceans were in the	<b>Interactions</b> Current MSDF - species code (row 127) and Fate Code (row 127) indicating	<b>Secretariat comment:</b> Could be a new yes no question on Observer Trip Monitoring Summary

ANNEX 2				
Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	ALTERNATIVE OR SUPPLEMENTARY COMMENTS
PNA support maintaining		vicinity of the gear being released Were cetaceans landed on board and retained	retained, condition when caught (row 105), fate (row 106), condition when released (row 107), type of interaction (row 154), data and time of interaction (row 155), latitude and longitude of interaction (row 156), species code of marine reptile, marine mammal, or seabird (row 158), vessels activity during interaction (row 169), condition observed at start of interaction (row 170), condition observed at end of interaction (row 171), description of interaction (row 174), number of animals sighted (row 175)  <b>New proposed MSDF data fields</b> - Time of SSI first sighting with time recorded before or after Set time (row 157), SSI is incidentally encircled in the purse seine net (row 172), if SSI is	related to whether intentional setting on cetaceans was observed. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific incidents  <i><u>PNA comment: PS-3 already capture SSI sighting and encirclement data for purse seine and support that additional Yes/No question on the GEN3 maybe taken up during debriefing to minimize at-sea workload</u></i>

ANNEX 2				
Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	ALTERNATIVE OR SUPPLEMENTARY COMMENTS
			<p>caught by longline, what is the length of line on released live animal (longline caught) (row 173)</p> <p><i>Check that there are some observed fate codes indicates retention in whole or in part for SSI</i></p> <p><b>Current CCFS CWS interactions</b> with purse seine and cetaceans are created by Secretariat based on current MSDF fields referred to above</p>	
<p><b>CMM 2024-07 02</b> Requirements in the event of unintentional encircling of cetaceans in the purse seine net, including incident reporting requirements</p> <p>PNA supports maintaining</p>	Report on interactions with cetaceans that were seen from the vessels -	Were efforts made to release cetaceans that were encircled in the purse seine net, and where cetaceans landed on board released	<p><i>Check that there are some observed fate codes indicates retention in whole or in part for SSI</i></p>	<p><b>Secretariat comment:</b></p> <p><i>Could be a new yes no question on Observer Trip Monitoring Summary as to whether the vessel had any interactions with cetaceans that are documented. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to safe handling</i></p>

ANNEX 2				
Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	ALTERNATIVE OR SUPPLEMENTARY COMMENTS
				<i>practices</i>
<p><b>CMM 2024-07 03</b> CCMs shall prohibit all longline and purse seine vessels flying their flag from harvesting, retaining onboard, transshipping, or landing any cetacean, in whole or any part thereof, in the Convention Area</p> <p>PNA supports maintaining</p>		<p>Did fishing vessel catch a cetacean, and was it retained onboard, or transhipped</p> <p>Was the capture/fate correctly recorded</p>	<p>Interactions</p> <p><b>Current MSDF</b> - species code (row 127) and Fate Code (row 127) indicating retained, condition when caught (row 105), fate (row 106), condition when released (row 107), type of interaction (row 154), data and time of interaction (row 155), latitude and longitude of interaction (row 156), species code of marine reptile, marine mammal, or seabird (row 158), vessels activity during interaction (row 169), condition observed at start of interaction (row 170), condition observed at end of interaction (row 171), description of interaction (row 174), number of animals sighted (row 175)</p> <p><b>New proposed MSDF data fields</b> - Time of SSI first</p>	<p><b>Secretariat comment:</b>  <i>Could be a yes no question on Observer Trip Monitoring Summary related to whether retention of cetaceans was observed. The MSDFs data fields should be reviewed to check that they will sufficiently document observations related to specific incidents involving retention and transshipping of cetaceans</i></p> <p><b>PNA comment:</b> <u>PS-3 already capture SSI sighting and encirclement data for purse seine and support that additional Yes/No question on the GEN3 maybe taken up during debriefing to minimize at-sea workload</u></p>

ANNEX 2				
Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	ALTERNATIVE OR SUPPLEMENTARY COMMENTS
			<p>sighting with time recorded before or after Set time (row 157), SSI is incidentally encircled in the purse seine net (row 172), if SSI is caught by longline, what is the length of line on released live animal (longline caught) (row 173)</p> <p><i>Check that there are some observed fate codes to indicate retention in whole or in part for SSI</i></p>	
<b>CMM 2024-07 04</b> CCMs shall require all longline vessels flying their flag, including those fishing under charter arrangements, to release, taking into account the safety of the crew, any cetacean that is caught or entangled by its fishing gear in the Convention Area as soon as possible and in a manner that results in as little harm to the cetacean as possible and utilizing the Best Practices for the Safe	Report on interactions with cetaceans that were seen from the vessels	Were efforts made to release cetaceans that were entangled by fishing gear, and where cetaceans landed on board released	<b>Interactions</b> <b>Current MSDF</b> - species code (row 127) and Fate Code (row 127) indicating retained, condition when caught (row 105), fate (row 106), condition when released (row 107), type of interaction (row 154), data and time of interaction (row 155), latitude and	<b>Secretariat comment:</b> <i>Could be a new yes no question on Observer Trip Monitoring Summary as to whether the vessel had any interactions with cetaceans that are documented. The MSDFs data fields should be reviewed to check that they will sufficiently document observations</i>

ANNEX 2				
Obligation	Description of scientific monitoring needs for data collection by observers	Description of potential compliance issues for data collection by observers	Notes on current MSDFs and/or proposed edits	ALTERNATIVE OR SUPPLEMENTARY COMMENTS
<p>Handling and Release of Cetaceans (suppl_CMM 2011-03-01), if possible</p> <p>PNA supports maintaining</p>			<p>longitude of interaction (row 156), species code of marine reptile, marine mammal, or seabird (row 158), vessels activity during interaction (row 169), condition observed at start of interaction (row 170), condition observed at end of interaction (row 171), description of interaction (row 174), number of animals sighted (row 175)</p> <p><b>New proposed MSDF data fields</b> - Time of SSI first sighting with time recorded before or after Set time (row 157), SSI is incidentally encircled in the purse seine net (row 172), if SSI is caught by longline, what is the length of line on released live animal (longline caught) (row 173)</p> <p><i>Check that there are some observed fate codes</i></p>	<p><i>related to safe handling practices</i></p> <p><b><u>PNA comment: PS-3 already capture SSI sighting and encirclement data for purse seine and support that additional Yes/No question on the GEN3 maybe taken up during debriefing to minimize at-sea workload</u></b></p>



<b>ANNEX 2</b>				
<b>Obligation</b>	<b>Description of scientific monitoring needs for data collection by observers</b>	<b>Description of potential compliance issues for data collection by observers</b>	<b>Notes on current MSDFs and/or proposed edits</b>	<b>ALTERNATIVE OR SUPPLEMENTARY COMMENTS</b>
			<i>indicates retention in whole or in part for SSI</i>	