



9th E-Reporting and E-Monitoring Intersessional Working Group Meeting

16 June 2026

Online

10:00am - 2:00pm (Pohnpei time)

Operational Framework Strawman

ERandEMIWG9-2026-OP01

2 June 2026

The Nature Conservancy

Operationalising the Western and Central Pacific Fisheries Commission's Regional Electronic Monitoring Program

A working strawman to support the Western and Central Pacific Fisheries Commission (WCPFC) Electronic Reporting and Electronic Monitoring Intersessional Working Group (EREM IWG) deliberations

BACKGROUND

Since the adoption of the WCPFC electronic monitoring (EM) standards at its 21st Regular Session in 2024, the EREM IWG has been working to develop a WCPFC EM Program to operationalize EM in WCPFC fisheries. During the last IWG meeting in April of 2026, there was significant discussion on the roles and responsibilities as well as questions regarding data flow within an audit process.

In response to these discussions, the Nature Conservancy (TNC), a technical support partner to multiple CCMs (Members, Participating Territories, Cooperating Non-Members), offered to develop an operational framework to support the ongoing deliberations of the IWG in its development of the Regional Electronic Monitoring Program (REMP). At this time, TNC outlined that it would seek to describe the roles, responsibilities and the operation of the REMP, using TNC's experience and expertise in EM programs throughout the WCPFC region and globally.

The operational framework set out in this document is **not** a final audit, assurance and verification program; instead, the document seeks to stimulate discussion in the IWG in its development of the necessary policies and governance structures to support the implementation of EM for effective fisheries management.

TNC presents this to the WCPFC EREM IWG for discussion at this meeting and continues to offer our collective expertise and experience to CCMs in this program of work.

ELEMENTS OF THE STRAWMAN

The Strawman overviews i) potential roles and responsibilities of the key actors involved in the implementation and delivery of CCM and/or subregional (e.g., Forum Fisheries Agency (FFA) and Parties to the Nauru Agreement (PNA)) programs, ii) possible approaches to how a CCM/subregional EM program could be authorised, iii) how that builds and contributes to the REMP and iv) outlines possible approaches for auditing/quality assurance and secondary EM footage review (review for Data Quality). These largely follow the possible approaches set out in the Chair's paper on the same topic.

The second key element of the strawman is to describe the possible EM data flow. Using the WCPFC Regional Observer Program (ROP) as a basis, a possible approach to the EM data flow is provided first as a generic data flow, which is supplemented by three scenarios:

- a. CCM EM program operating on its own flag vessels operating largely in-zone;
- b. CCM vessels operating in two or more coastal State EEZs; and

c. Vessels operating in two or more coastal State EEZs and on the high seas.

CONCLUSION

The purpose of this strawman is not to design a final audit framework or propose regulatory language. Rather, it is intended as a clear, visual, performance-based operational model that can be used to support CCM understanding of a potential REMP. It provides background context and highlights relevant considerations in order to encourage informed discussion and facilitate further dialogue.

Key considerations that were uncovered while developing this document include:

- The possibility of implementing a tiered audit system, using other monitoring control and surveillance tools to limit the need to review additional video footage.
- The need to determine who has the responsibility, or delegated authority, to complete the initial data review, under different scenarios (i.e. when the Flag State and Coastal State are different, or when there are multiple EEZs involved).
- The need to adopt a data ownership, access, and security protocol and policy.
- The need to distinguish between auditing for performance and auditing for compliance purposes.
- Determining how other monitoring, control, and surveillance tools can support record analysis and quality review.

TNC intends to illicit further input from relevant stakeholders, particularly IWG members, to develop a second draft of this strawman, which will include key questions and discussion points to support the IWG process.

Roles and responsibilities in association with EMPs and the REMP

CCMs recall that the existing WCPFC ROP is made up of existing national and subregional (FFA and PNA) observer programs. These programs were, and are ongoingly, accredited against the WCPFC ROP Standards enabling the data from the programs to be included in the WCPFC observer dataset and for the data to be used to support CCM compliance with various obligations through the CMS process. Under the REMP, the roles and responsibilities remain the same (Figure 1).

National authorities (whether coastal State or Distant Water Fishing Nations (DWFN) and subregional programs can establish their own EM programs (Figure 2). This includes establishing all necessary policies, governance arrangements, and structures to support EM on its flag vessels. It requires CCMs to implement EM footage review either as part of their own service delivery or via a contract with a third party. The CCM is also responsible for all relevant reporting both through the Part 1 Annual report for the EM data itself (in the same way as for operational level data and ROP data) and in the Part 2 Annual report in relation to the implementation of their EM program itself.

In relation to the primary footage review (EM Record Analysis), a key difference between the coastal State CCM and the DWFN is primary footage review for activities occurring in-zone. Here, TNC has assumed that under the FFA/PNA Minimum Terms and Conditions for fishing activities in coastal State EEZs, that the primary EM footage review would likely be undertaken by the relevant coastal State. Similarly, the WCPFC EREM IWG needs to consider how the primary EM footage review occurs for fishing activities occurring on the high seas. In this instance, it may be that the DWFN EM program conducts the primary EM footage review or that it is undertaken by an accredited third party to retain the power of the EM program as being a trusted source of independent data about activities occurring at-sea.

If these CCMs/subregional bodies seek to have their programs included in the WCPFC REMP, then their program must be accredited to ensure that the program itself meets the standards agreed and adopted by the WCPFC. The WCPFC Secretariat, or via a contract with a third party if specific expertise is required, undertakes a review and assessment of the program – the accreditation process (Figure 3). For example, ensuring that the CCM/subregional organisation has policies and practices in place to ensure that the camera placement on its flag vessels captures all activities of interest to the EMP, or that the program's EM records meet identified accuracy and quality standards. Importantly, in this example, the accreditation will not consider the individual vessel level monitoring plans themselves, only that the program has relevant policies, procedures and reviews supporting this element.

Like all WCPFC data, from operational level data to regional observer data, the Scientific Service Provider, SPC, plays a critical role in receiving the EM data from national/subregional bodies, securely storing the data for use in WCPFC scientific and policy discussions. The Scientific Service Provider can make the assessment of whether the EM data meets the WCPFC Data Minimum Standards agreed by CCMs.

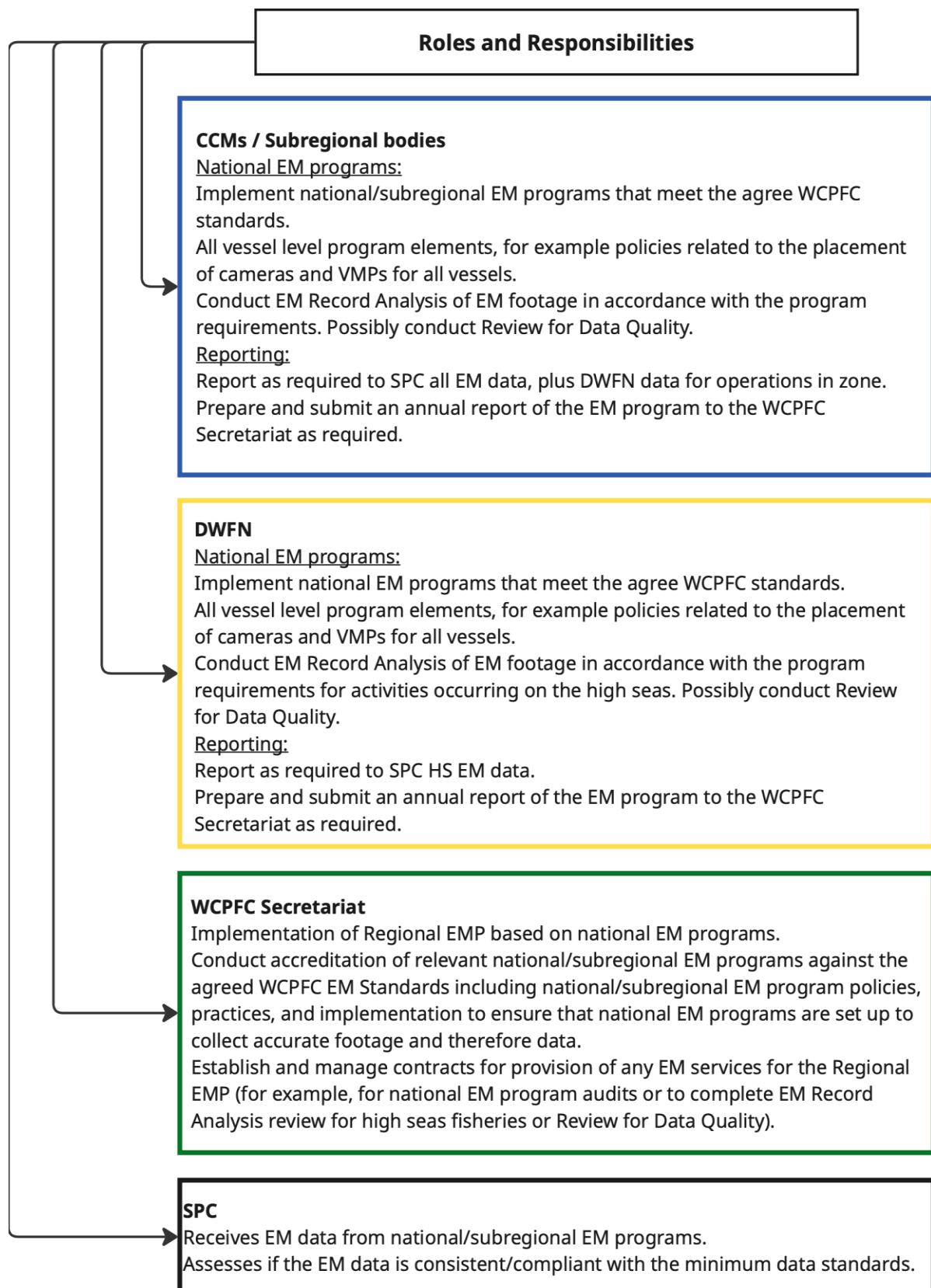


Figure 1: Roles and responsibilities of the key actors involved in the implementation of the WCPFC REMP.
NB: Colours used here will follow through the following schematics.

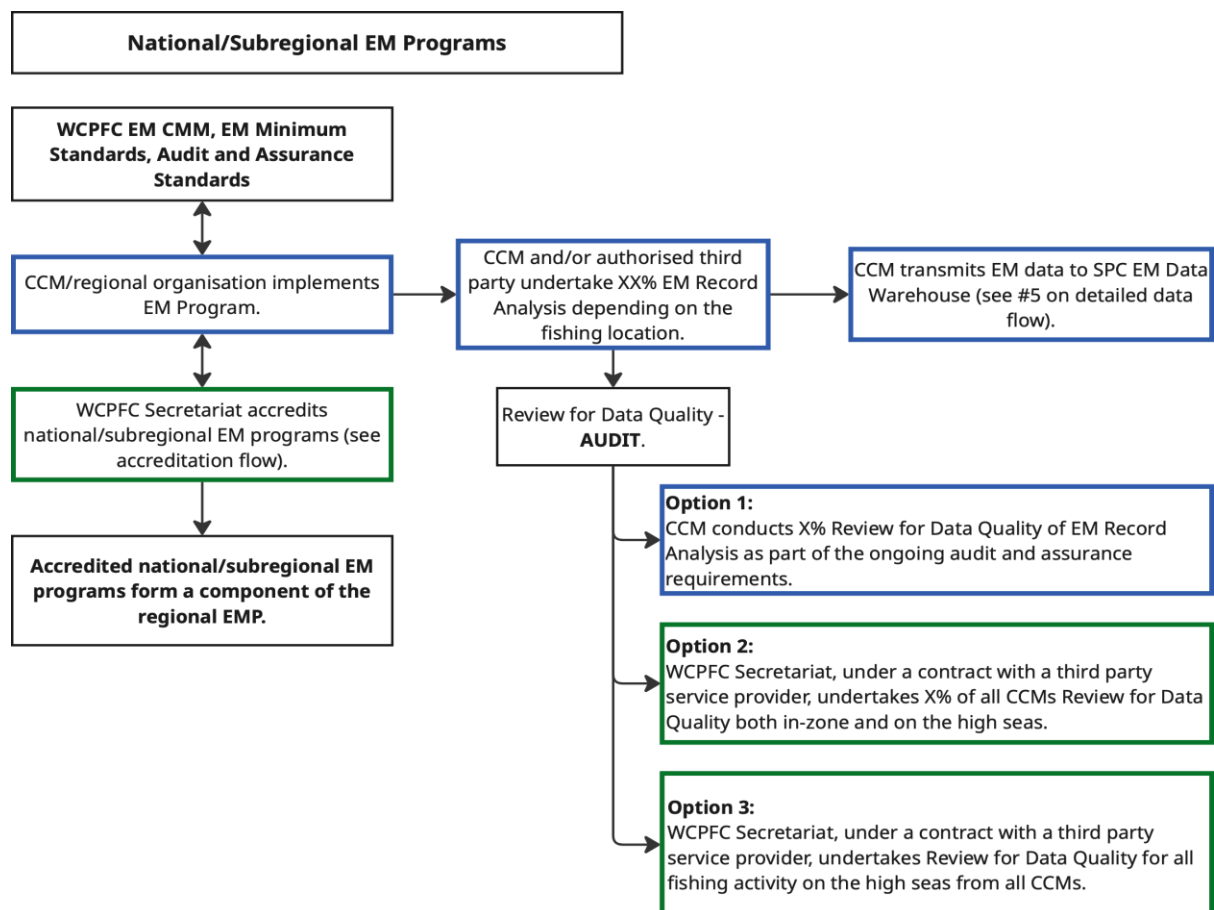


Figure 2: EM programs established by a coastal State or DWFN CCM or a subregional organisation.

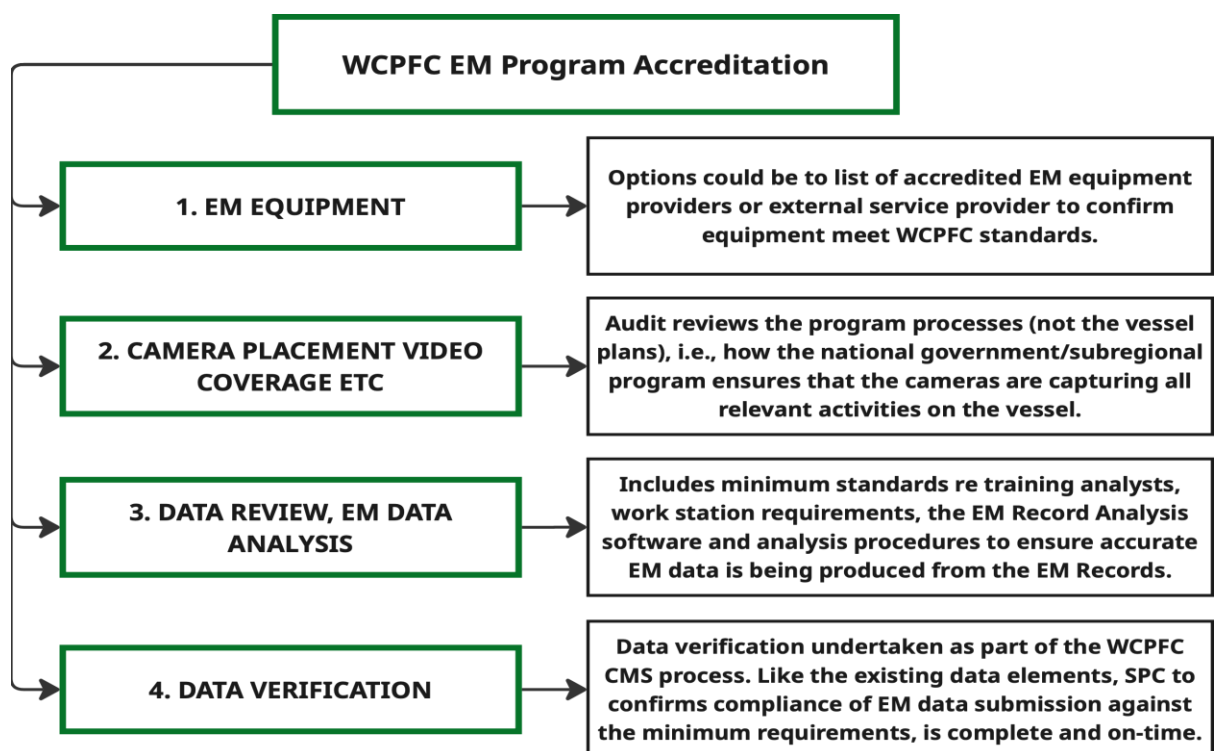


Figure 3: Possible approaches to the conducting of the WCPFC Accreditation of CCM EMPs, separating out the initial and ongoing accreditation process from audit via the secondary EM footage review process and the data verification process through the annual CMS process.

EMP data flow

As identified above, the second key element of this document is outlining a possible approach to the EM data flow. The proposed approach is modelled off the existing ROP data flow (Figure 4).

The schematic identifies the major steps in the movement of data from its empirical source – the observer or the camera – through to the FMC where the debriefing or primary EM footage review takes place. In the case of the EM data flow, the schematic identifies the secondary EM footage review, noting that this secondary EM footage review could be undertaken in many possible ways (e.g., CCM or third party) depending on the decisions of the Commission.

Importantly, the schematic also captures the data flow if an incidence of potential non-compliance on board a specific vessel (potential IUU case) is identified. The schematic also illustrates that the secondary review might:

1. identify the potential non-compliance onboard a fishing vessel, rather than the primary review depending on who conducts the review, and
2. identify compliance issues with the program itself, for example how the primary review was undertaken and associated quality/accuracy standards.

In both instances, the potential non-compliance would be subject to the same existing compliance assessment processes already implemented in the WCPFC. Similarly, a review of the EM data submissions from CCMs/subregional organisations would be presented to the CMS process along with the review of all obligations related to the minimum data standards.

To help contextualise this generic data flow three scenarios have been developed. These scenarios are modelled off the rules and operation of the WCPFC ROP.

Figure 5 – shows the data flow from coastal State vessels operating largely in-zone under the coastal States (or using a subregional EM program). In this scenario, the data flow is simple, collected by and managed by the coastal State CCM (or a subregional organisation) and transmitted as part of the Part 1 Annual report to the Secretariat and Scientific Service Provider.

Figure 6 – shows the data flow from vessels operating in two or more coastal State waters. This data flow shows the data flow through the subregional organisation, however there is the possibility that the coastal States all operate individual national EM programs making this data flow complex at the point of EM record transmission.

In this instance, the data flow may be more complex depending on if the coastal States are using their own national EM program or a subregional EM program, where the primary EM footage review may be undertaken by two coastal States and therefore the EM records from the vessel would need to be transmitted to the relevant coastal States prior to analysis. However, if the subregional organisation is undertaking the primary EM footage analysis, the records would be transmitted directly to the subregional program.

Figure 7 – this scenario looks at the data flow when a vessel is operating in two or more coastal States and on the high seas. The schematic identified that for activities occurring in-zone that the vessel would need to transmit the EM footage to the relevant coastal State(s) for activities occurring in-zone for primary EM footage review. For activities on the high seas, the schematic identifies, that depending on the decision of the Commission, the primary EM footage analysis could be undertaken by the flag State or by a third party. Alternatively, an approach could be considered where an authorized party does the review for activities across all zones, while each coastal state receives analysed reports with options to access the raw data for additional review and quality control.

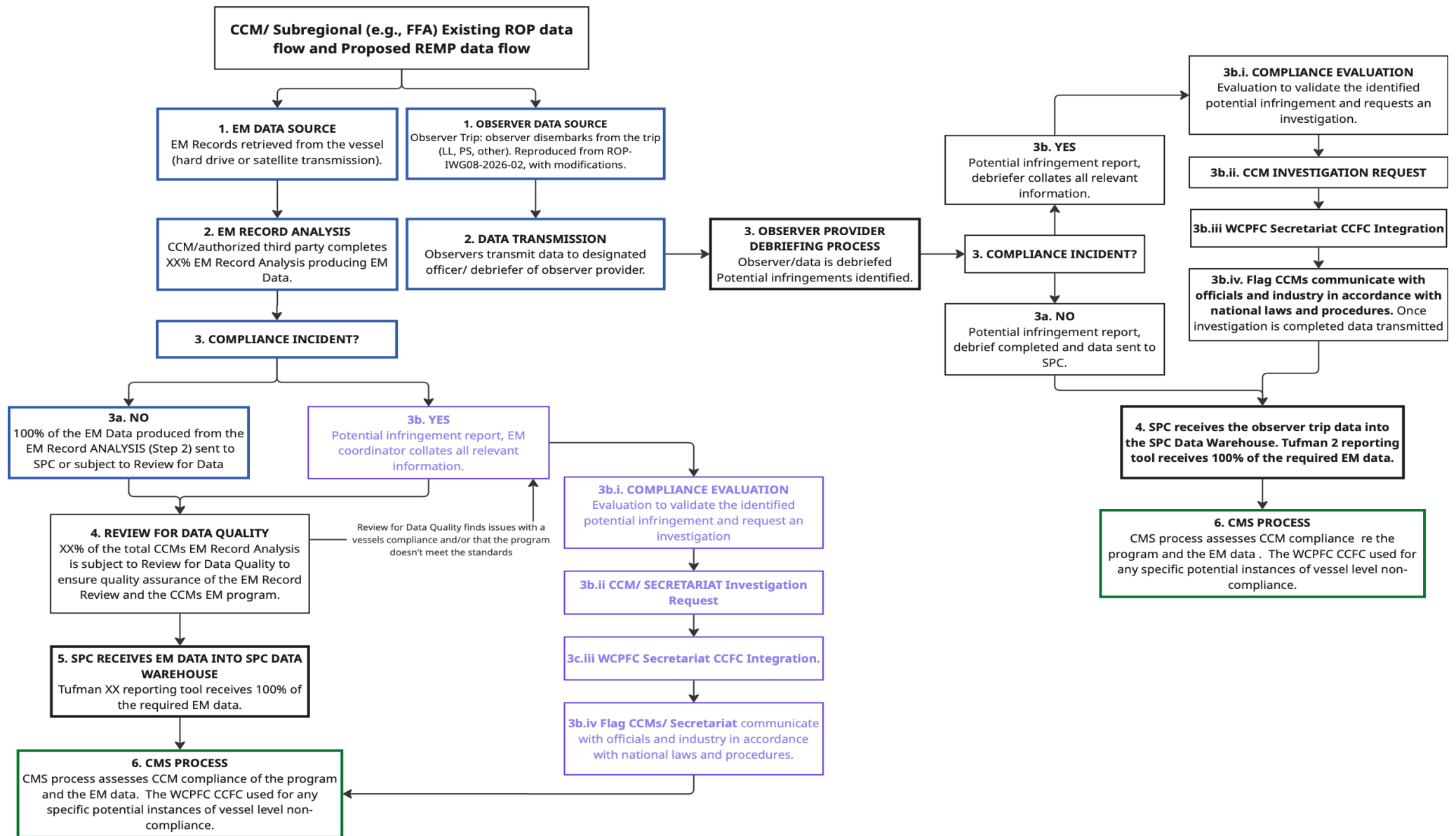


Figure 4: Data flow of the existing WCPFC ROP and proposal for the data flow for the EM program, ROP aspect reproduced with modification from ROP-IWG08-2026-02.

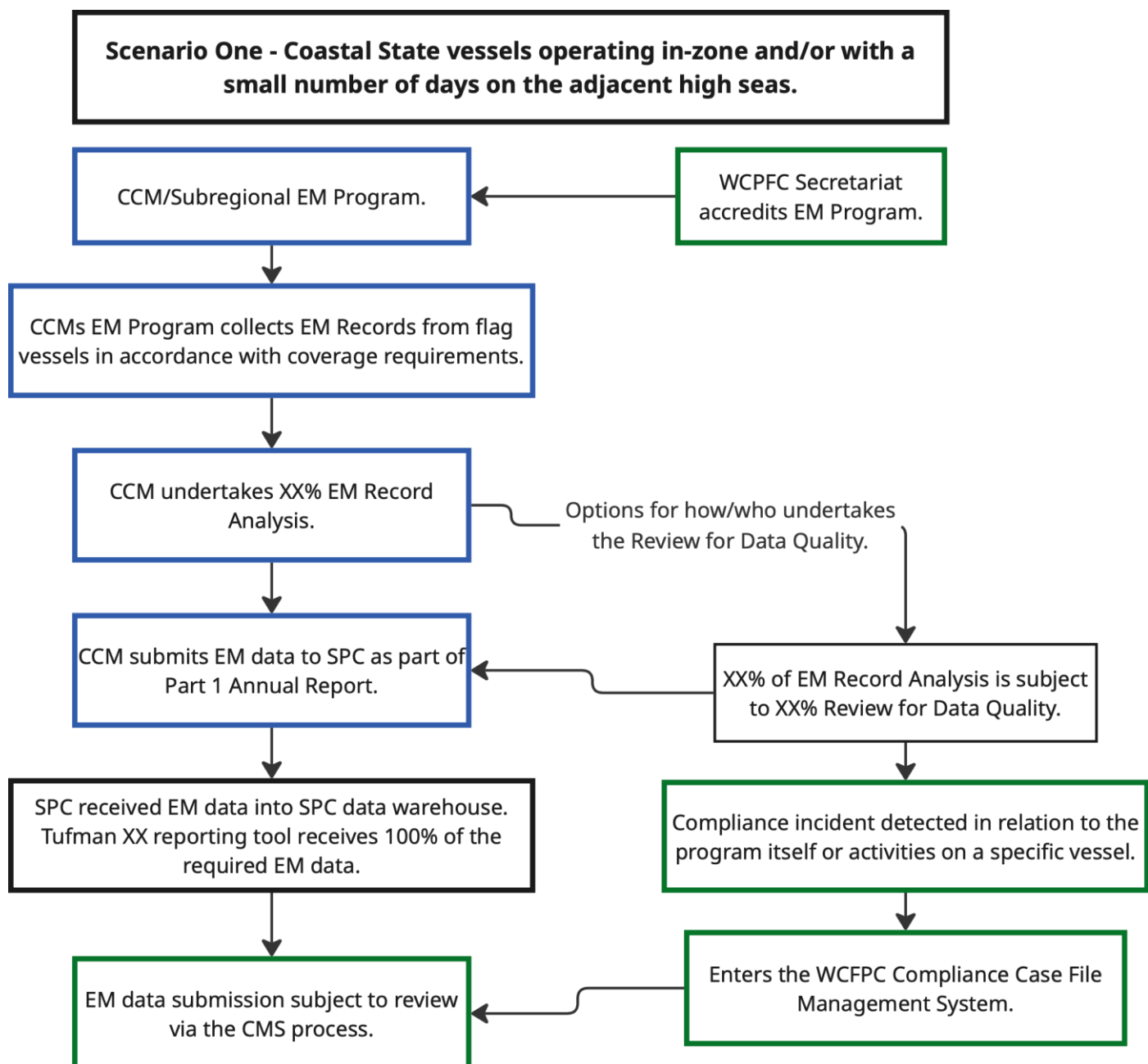


Figure 5: Data flow from coastal State vessels operating largely in-zone under the coastal States or the subregional EM program. The data flow is simple, collected by and managed by the coastal State CCM and transmitted as part of the Part 1 Annual report to the Secretariat and Scientific Service Provider.

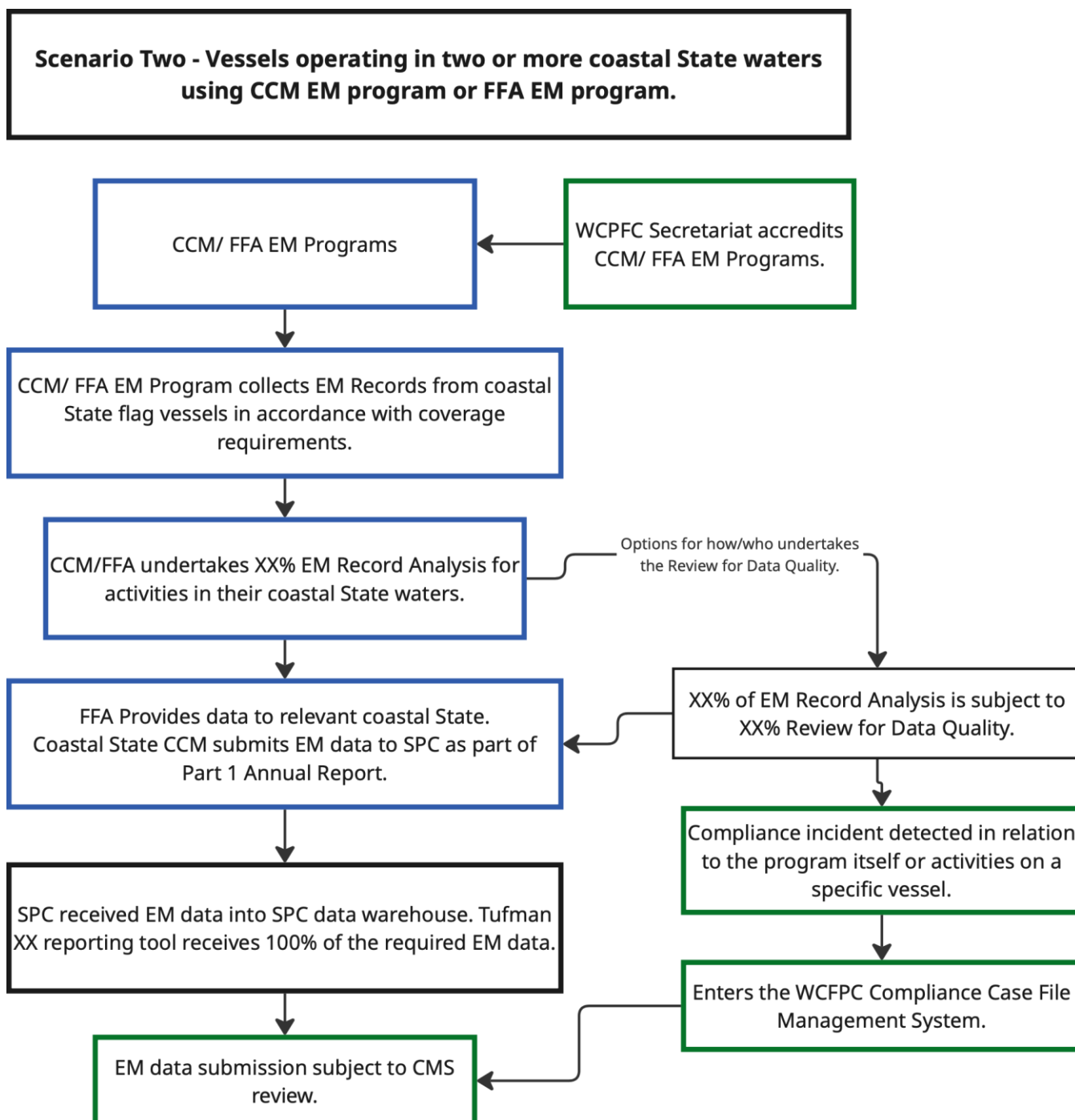


Figure 6: Data flow from vessels operating in two or more coastal State waters. This data flow shows the data flow through the subregional organisation. Here the data flow may be more complex depending on if the coastal States are using their own national EM program or a subregional EM program, where the primary EM footage review may be undertaken by two coastal States and therefore the EM records from the vessel would need to be transmitted to the relevant coastal States prior to analysis. However, if the subregional organisation is undertaking the primary EM footage analysis, the records would be transmitted directly to the subregional program.

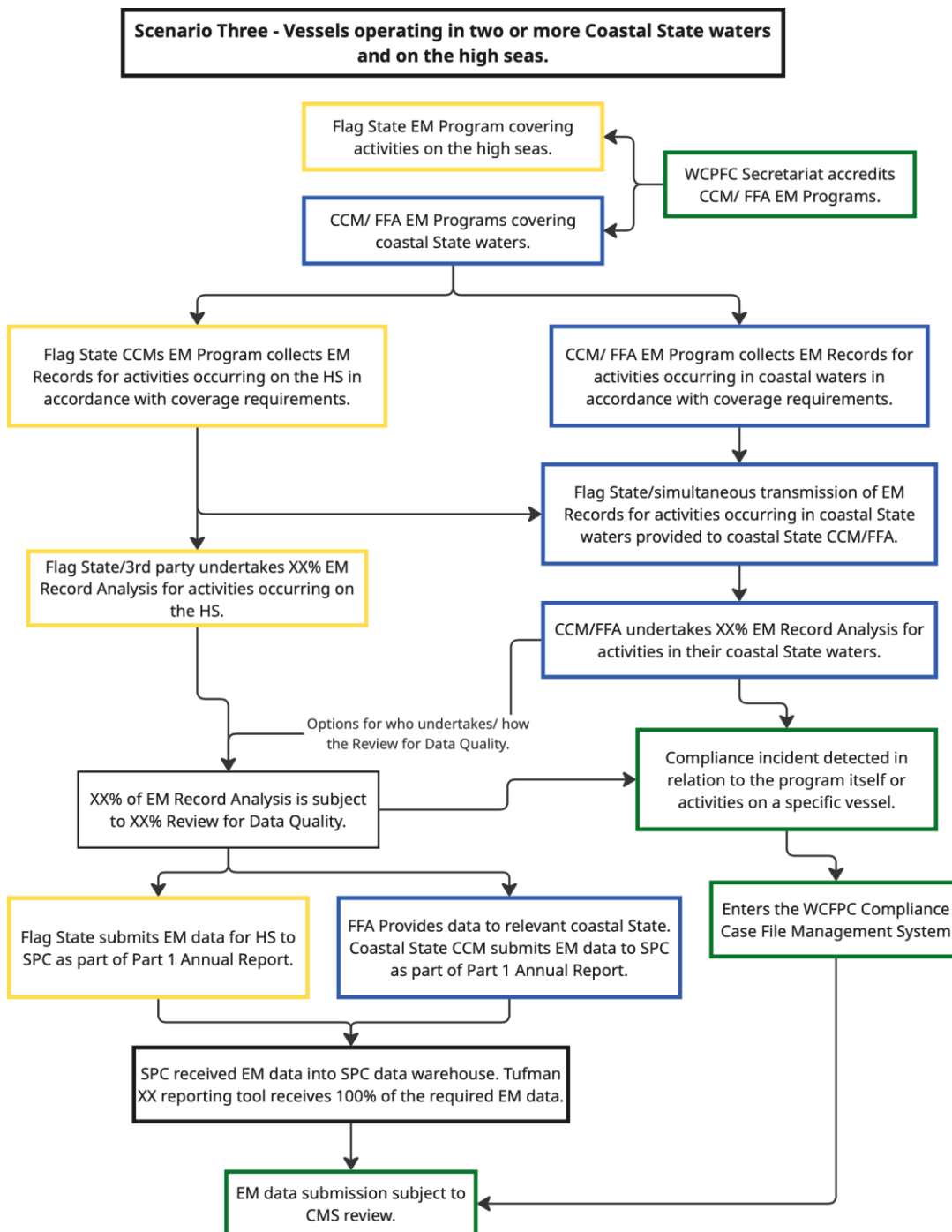


Figure 7: Data flow from vessels operating in two or more coastal State waters and on the high seas. The schematic identified that for activities occurring in-zone that the vessel would need to transmit the EM footage to the relevant coastal State for activities occurring in-zone for primary EM footage review. For activities on the high seas, the schematic identifies, that depending on the decision of the Commission, the primary EM footage analysis could be undertaken by the flag State or by a third party.