



CCSBT-CC/2410/07

Draft Compliance Action Plan (CAP) for 2025 – 2029

1. INTRODUCTION

The Compliance Action Plan (CAP) is a key component that delivers on the [Compliance Plan](#) (refer to Appendix 1) and sets out the CCSBT's project and ongoing compliance work for a specified timeframe to address a set of agreed priority compliance risks.

CCSBT's updated Strategic Plan for 2023 to 2028 specifically includes an action item (number 5i) to "*update or revise the 2018-2020 Action Plan to the next five-year phase as a matter of urgency based on the recommendations from the Performance Review*".¹

In 2023, work commenced on a draft revised CAP. The Fourth Meeting of the Technical Compliance Working Group (TCWG 4) identified fifteen compliance risk items, and progress was made at both TCWG 4 and Eighteenth Meeting of the Compliance Committee (CC18) on identifying CAP action items to address these risks. However, CC 18 did not have sufficient time to complete this work and agreed that:

"38. the development of the CAP could continue intersessionally by correspondence and that the draft CAP could be finalised at TCWG 5 (if convened) and CC 19 in 2024."

TCWG 5 has since been merged with CC19 and to meet the goals of the Strategic plan, it is important that the Secretariat and Members complete work on the development of the draft CAP during CC19.

This paper provides:

- Some general background material including a summary of the intersessional correspondence process;
- The current draft list of compliance risks from CC18 (**Attachment A**);
- A draft CAP Action Plan (A) and Ongoing Workplan (B) commenced during TCWG 4/CC 18, including additions, updates and comments from Members received during the intersessional correspondence process (**Attachments B & C** respectively); and
- A combined draft CAP that includes the specific and ongoing actions (from both Attachments B & C) together under the associated risks (**Attachment D**).

2. BACKGROUND

A few important decisions have been made that have had a significant impact on the updating of the CAP in the past five years.

In 2019, the Fourteenth Meeting of the Compliance Committee (CC14):

"... recommended that the CAP becomes a five-year plan from 2021 onwards with the caveat that it is reviewed rigorously on an annual basis as part of a standing agenda item and is as such considered to be 'a living document'".²

¹ The reasons for the CAP being significantly out-of-date are noted in the background section (2)

This recommendation was agreed by CCSBT 26. Previously the CAP had only covered a three-year period.

Subsequent to this decision, significant COVID-related constraints delayed updating the CAP. CCSBT's 2020 to 2022 inclusive annual meetings were all held online due to COVID-19 and at CC15 (2020) it was agreed that revision of the CAP, a 5-year plan, should not be considered further until the next appropriate face-to-face meeting. Therefore, consideration of a revised CAP was placed on hold until 2023 where it was again progressed at TCWG4 and CC18. However, there was insufficient time for CC 18 to finalise a revised CAP and it is now essential that CC 19 finalise the document to avoid falling further behind.

3. INTERSESSIONAL PROCESS

The Secretariat led an intersessional correspondence group process between March and April 2024 to continue work on the draft CAP.

The agreed draft list of fifteen compliance risks was provided to Members for reference and to assist with consideration of the Action Plan. Members were not asked to provide any further feedback on this draft agreed list as part of the intersessional process.

The following documents were provided to Members for comment, additions, and potential amendments:

- Draft Action Plan (A) including a set of discussion notes for each item/risk for which no action item had yet been proposed by TCWG 4/CC 18 (*i.e.* risk items 4 and 11 – 15).
- Ongoing Workplan (B) with suggested ongoing actions and responsibilities for risks 2, 7 and 9 – 14 and a general category drafted and added in by the Secretariat.

Comments and/or proposed text/amendments were received from all Members except the EU and South Africa. All the feedback received has been incorporated into **Attachment B, C, and D** in tracked changes/comments. The Secretariat notes there were suggestions from Members of proposed action items to address the compliance risks that TCWG4/CC18 did not have time to address. However, there is some overlap between some of these suggested actions, which will need to be considered and resolved. Only three comments were received from Members on the Ongoing Workplan, which resulted in two additional action items being added to the draft document.

It is important for Members to consider all proposed actions (specific and ongoing) to ensure that, together, they effectively address the agreed risks. Therefore, the Secretariat has combined all actions in Attachment D for Members consideration.

A summary of the points made/comments provided by each Member is as follows:

Australia

- Provided proposed updated timeframes for various action items;
- Provided a proposed action item for risk 11;
- Provided specific comments on risk items 8 (responsible party) and a proposed amendment to already agreed draft action item 9; and
- Provided a general comment that Australia is mindful of the Secretariat's workload including the workload involved in cross-checking ERS and VMS compliance with other RFMOs.

² Paragraph 85 (dot-point 2) of [CC14's annual report](#)

Indonesia

- Provided proposed updated timeframes for many action items;
- Provided proposed action items to address risks 11, 12 and 15, although the latter proposal was moved by the Secretariat, with the agreement of Indonesia, to the Ongoing Workplan - item 9c; and
- Did not provide any comments on the Ongoing Workplan.

Japan

- Provided proposed updates for many items, principally those that did not have action items, but also suggested some amendments to text and timing for existing action items;
- Proposed combining the three actions specified under risk number 9 into one action that is aligned with objective 2 of the Seabird Strategy, noting that Japan felt the proposed actions already appear in this strategy;
- Provided new suggested text for risk number 9, action a) noting that Japan felt this could be more general and mention wider approaches, since this risk applied to both target and non-target species;
- Identified priority actions for risk number 7; and
- Suggested that it was more appropriate to review the Resolution on Port Inspection after and based on review of the Resolution on transshipment (in 2025 with the proposed introduction of supply declarations).

Korea

- Proposed action item to address risk numbers 4, 14 and 15;
- Collaborated with the Secretariat to propose more details on a draft process associated with proposed action item 14;
- Noted it had no specific suggestions to address risks 11, 12 and 13 and supported the suggestions/comments from the Secretariat; and
- Proposed item e) to address grouped risks 11/12/13/14 in the Ongoing Workplan (**Attachment C- included as action no 14 c) in Attachment D**) – in support of the action item proposed for risk 14.

New Zealand

- Suggested the actions to address the e-CDS related risks (1 and 2) should prioritise Members, with those focussed on non-Members pushed out in the timeline until after Members are using the e-CDS consistently;
- Noted that New Zealand's primary method for identifying seabirds was EM, rather than feather samples, so suggested that prioritising EM should be an option to address risk number 10;
- Supported the addition of the reporting back requirement to specific actions to address risk items 5, 6 and 7;
- Supported the Secretariat's discussion on possible action items that could be added to address risk numbers 4, 11, 12 and 14, but did not specify actions related to these risks;
- Suggested to address risk number 13, the Secretariat compile a report with all noncompliance assembled in one place that could be updated to track progress against items. New Zealand felt this would make it easier for all Members to understand and address non-compliance;
- Supported increased information sharing between RFMOs to address risk number 15, especially with regard to high seas monitoring and inspections; and
- Suggested streamlining the Ongoing Workplan to avoid duplication, given the number of similar actions, but did not identify any specific actions of concern.

Taiwan

- Supported adding action items to address risks 4 and 14 but did not propose any specific text, although did propose responsibility and timeframes;
- Proposed some updated timeframes for actions to address risk 7;
- Supported risk item 13 with the caveat that there should be a further discussion on the potential of the letters and responses being publicly available due to privacy. Taiwan did not propose any specific text but did suggest responsibility and timeframes;
- Recommended not adding action items to address risks 11, 12 and 15; and
- Had no comments on the Ongoing Workplan.

4. RECOMMENDED ACTIONS

CC19 is invited to:

- Consider, complete and recommend a draft five-year Compliance Action Plan (CAP) for 2025 to 2029 to EC 31 which:
 - Includes a list of agreed Compliance Risks including the assessed magnitude of each risk (high/medium/low);
 - Includes a set of specific project and ongoing action items that together effectively address each of the compliance risks;
 - Identifies the responsibilities assigned to each action item; and
 - Identifies the timeframe within which each action item should be completed.
- Recommend that the Secretariat undertakes a review and assessment of the current Compliance Plan to assess its alignment with CCSBT's updated Strategic Plan for 2023 – 2028 adopted in October 2023. This assessment can then be presented to CC20, to inform Members discussions and to inform an updated Compliance Plan presented at CC21.
- Recommend the addition of a standing agenda item to the agenda of the CC from CC20 to rigorously review the CAP as a 'living document' on an annual basis as agreed at CCSBT 26.

Prepared by the Secretariat

Attachment A

Table 1: List of Compliance Risks Identified for the 202~~5~~4 - 202~~9~~8 Five-Year Compliance Action Plan

The compliance risks are numbered for easy reference but are not listed in any particular order:

Risk Item Number	Risk Description	Risk Matrix Score
1)	Non-compliance with the (e)CDS or incorrect information in (e)CDS documents	L/M
2)	Incomplete implementation or submission of (e)CDS data including Non-Members not cooperating with the CDS Resolution	M
3)	Incomplete reporting of SBT mortalities	H
4)	Not fully attributing all SBT mortalities (such as recreational catch, artisanal catches, discards, farm sector catches, non-farm commercial sector catches) against national allocations	L
5)	Non-compliance associated with transshipment obligations (both in port and at-sea)	M
6)	Incomplete submission of transshipment information including transshipment information for non-Member flagged vessels	L/M
7)	SBT mis-reported as other (non SBT) species	M
8)	Catches of SBT that are not reported by Non-Cooperating Non-Members (NCNMs) and so not taken into account	L/M
9)	Insufficient scientific observer data to manage target and non-target species	M/H
10)	Incomplete or inaccurate reporting of non SBT bycatches, including seabirds	H
11)	CCSBT Members not fully implementing specific Conservation and Management Measures (CMM's) as agreed, particularly the binding ERS measures of IOTC, ICCAT and WCPFC	L
12)	CCSBT Members not fully complying with the obligations of specific Conservation and Management Measures (CMM's) as agreed, particularly the binding ERS measures of IOTC, ICCAT and WCPFC	H
13)	Lack of systematic follow-up actions to address non-compliance leading to persistent non-compliance	M
14)	The increasing demands of work limiting the ability of the Secretariat to assess compliance	M/H
15)	Lack of comprehensive monitoring and inspection of vessels on the High Seas	L/M

Risk Matrix Score: L = Low, M = Medium, H = High

Attachment B

Draft Compliance Action Plan (for 20254 to 20298 inclusive)

A. Action Plan

RiskAction Item Ref. No.	Reference Information for Issue being Addressed <i>(these columns could be deleted from the finalised CAP)</i>		Action Required to Address Risk/ Draft Strategic Plan/ Seabird Strategy	Responsibility (Members and/or the Secretariat)	20254	20265	20276	20287	20298
	Risk Item No. & Matrix Score (H/M/L)	Draft Strategic Plan/ Seabird Strategy Ref No. <i>(if available/ relevant to the proposed action)</i>							
1	L/M	a) To continue to move towards implementation of the eCDS as soon as possible.	Members and the Secretariat	*	*	*	*		
		b) Expedite (e)CDS capacity building for Members and Member stakeholders. ¹	Members and the Secretariat	*	*	*	*	*	
2	M	a) Extend the availability of the (e)CDS to some key identified Non-Members.	Members and the Secretariat	*	*		*		
		b) Continue (e)CDS Member capacity building by the Secretariat. ^{1,2}	Members and the Secretariat	*	*	*	*	*	
3	H	a) Capacity building. ^{1,2}	Members and the Secretariat	*	*	*	**	*	

Commented [NZ1]: Questioned if this need to extend to 2027, given the eCDS is meant to be fully implemented by 2026.

Commented [JP2]: Suggested deleting asterisks from 2027 onwards noting that eCDS is scheduled to start on 1st January 2026 unless otherwise decided by EC.

Commented [NZ3]: Suggested prioritising getting Members using the eCDS and pushing the timeline for this out until after full implementation of the eCDS i.e. after the bugs are worked out and Members are using it consistently.

Commented [NZ4]: New Zealand suggested this should specify Member capacity building.

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¹ Part of the broader capacity building plan that will be developed by the Commission

			b) <u>Members self-describe how they obtain SBT mortality figures and review mortality reporting requirements.</u>	Members, Secretariat and ESC	*	*	*	*	
			c) Consider strengthening corrective actions policies.	Members	*	*			
4	L		a) <u>Members self-describe how they monitor, estimate and report all SBT mortalities. Discuss each Member's description/explanation and explore suggestions for possible improvement (CC).</u>	Members Secretariat and CC		*	*	*	*
			b) <u>Further effort by each member to improve and strengthen its estimate on the actual catch amount for each element outlined at paragraph 4 (b) of the limited carry-forward resolution.</u>	Members					
5	M		a) Review if arrangements have been implemented to ensure transshipment obligations are in place <u>and report back to the Compliance Committee (CC).</u>	Members	*	*	*	*	
			b) Review of compliance with transshipment obligations and what actions can be taken in the case of non-compliance of Members or NCNM Carrier Vessels <u>and report back to the CC.</u>	Members and the Secretariat		*	*		
6	L/M		a) <u>Strengthen CCSBT's Transshipment Resolution including considering the introduction of supply declarations in 2025.</u>	Members	*	*			
			b) Improve and enhance the existing information sharing arrangements between CCSBT and other	Members and Secretariat		*			

Commented [NZ5]: Questioned whether this is already done, and suggested incorporating it into Member's regular reporting requirements.

Commented [KR8]: Action item proposed by Korea to be done by Members and the CC in 2028/29

Commented [TW6]: Noted support of risk item 4 being done by Members and the Secretariat in 2026/27 but did not propose any corresponding action item text

Commented [NZ7]: New Zealand stated support for the intent of the Secretariat's discussion points provided for risk item 4, but did not propose a specific action item.

Commented [JP9]: Proposed by Japan, but no time frame for this was specified.

Commented [JP10]: Suggested deleting the asterisks for 2026 and 2027 and added for 2025 noting that in 2025, the Compliance Committee will consider the introduction of supply declarations and review the performance in relation to special arrangement for at-sea transshipment based on QAR. Japan also suggested adding an asterisk for 2028 suggesting that the next review of the Resolution should be conducted after certain period, e.g. 3 years.

Commented [NZ13]: Suggested this could be pushed out in the timeline but did not specify a suggested timing.

Commented [Sec11]: The Secretariat has proposed adding a reporting back element (tracked) to some of the proposed existing action items (tracked - see risk items 5, 6 and 7)

Commented [NZ12R11]: New Zealand supported this idea

Commented [AU14]: Australia noted this action item needs to be more specific but did not provide any suggestions

Commented [Sec15R14]: The Secretariat has added in the required consideration of Supply Declarations to provide more specificity

Commented [Sec16]: Australia suggested deleting the asterisk for 2025, however the Secretariat notes that CCSBT's Transshipment Resolution requires consideration (...)

			RFMOs with respect to transshipment information.						
			c) Introduce relevant punitive measures as part of a more comprehensive Corrective Actions approach (review of Corrective Actions Policy).	Members and Secretariat	*	*			
			d) Examine the feasibility of increasing the 5% inspection requirement for foreign fishing/carrier vessels landing/transshipping SBT in port <u>and report back to the CC.</u>	Members and Secretariat		*		*	*
7	M		a) Continue work on development of in-situ real-time genetic testing kits to identify SBT <u>and report progress to the CCSBT annually.</u>	Members	*	*	*	**	*
			b) Develop SBT species identification guidelines for distribution.	Members	*		**		*
			c) Consider the costs and benefits of genetic testing in markets and whether to conduct such testing <u>and report back to the CC.</u>	Members and Secretariat			*		
			d) Consider the feasibility of transshipment observers taking tissue samples as part of the IOTC/ICCAT transshipment observer programmes <u>and report back to the CC.</u>	Secretariat	**	*			*
8	L/M		a) Members who are IOTC Members: i) Encourage IOTC to report SBT catch, and ii) Propose a revision to IOTC's Transshipment Resolution to require transshipment observers to pay special attention in cases where NCNMs are transshipping at-sea in SBT distribution areas and have not declared SBT.	Members	*		*		

Commented [AU17]: Australia suggested this may be an ongoing item and suggested deleting the 2025 timeframe asterisk

Commented [SEC18R17]: The Secretariat also notes that this is currently part of the discussion related to review of CPG3 and may need to be updated to reflect outcomes of those discussions.

Commented [JP19]: Suggested moving the asterisk to 2029, noting it is more appropriate to review the Resolution on Port Inspection after and based on review of the Resolution on transshipment in 2025.

Commented [JP20]: Stated support to give priority to Actions a) and c) and suggested that action d) should occur after a) and c) so that a) and c) can be the focus in the first part of the next period.

Commented [AU21]: Australia noted: "we should discuss whether this is for Members, or would be more effective if it came from the Exec Sec, on behalf of Members"

9	M/H	a) Enhance the reliability of logbook information through the use of EM for use of ERS reporting.	Members	*				
		b) Consider the costs and benefits of increasing scientific observer percent coverage levels and/or the EM review rate taking into account consideration by ESC regarding data collection through EM and report back to the CC.	Members	*	*			
10	H	a) Training and awareness programmes put in place including making updated ACAP resources available e.g. seabird identification guide, observer guidelines and fact sheets.	Members, Seabird Project, ACAP	*	*	*	*	
		b) i) Use feather sampling kits to aid with seabird identification. ii) Consider then develop an e-application to assist with seabird/feather identification.	Members		*	*		
		c) Initiate a project to coordinate feather sampling through a key Member or Members.	Members		*	*		
11	L	a) Consider the need to nominate seabird bycatch measures for vessels, for inclusion on the CCSBT authorised vessel register, or otherwise.	Members		*		*	
		b) Ensure members of CCSBT understand the Measures of other relevant tuna RFMOs (i.e., ERS, EM).	Members		*		*	
		c) Estimate of uncertainty from unreported catch (in particular from recreational and small-scale fishers).	Members		*		*	

Commented [AU22]: Australia suggested updating the text “Enhance” to “Potentially enhance” - the Secretariat notes the draft text presented here was agreed by CC18

Commented [JP23]: Japan suggested action (a) can be of a more general nature and mention wider approaches, since Risk 9 related to both target and non-target species. Japan stated they did not think there was a need to focus on logbook and use of EM for ERS reporting, noting there could be other methods to improve the scientific observer data. Japan suggested the following alternative text for this action:
 •Consider methods for enhancing the reliability of logbook information and scientific observer data through appropriate verification methods, including the use of EM, for target and non-target species.

Commented [JP24]: Japan noted that the proposed Actions (a) - (c) appear in the Multi-year Seabird Strategy and suggested to delete the three proposed actions and refer to objective 2 of the Strategy here to avoid duplication or inconsistency between this Action Plan and the Seabird Strategy. Suggested alternative text from Japan:

Implement necessary actions stipulated in Multi-Year Seabird Strategy to achieve the objective 2 which is to ensure the collection of reliable data.

Responsibility: ERSWG Members, ACAP

Commented [NZ25]: NZ noted that their primary method for seabird identification is EM rather than feather samples. So suggested that prioritising EM/camera identification should also be an option/considered (while still acknowledging the usefulness of feather sampling).

Commented [AU27]: Proposed by Australia

Commented [ID28]: Action items 11 b) and c) proposed by Indonesia

Commented [NZ26]: New Zealand supported the action items suggested by the Secretariat in the discussion notes (copied below), and questioned if it made sense to push these out on the timeline (i.e. 27/28) to occur after the review of f ...

			<u>for it to report on how it has addressed each item at the next CC.</u>							
14	M/H		a) <u>Review current and future (expected) workload of the Secretariat and discuss possible solutions.</u>	<u>Members and Secretariat</u>	*	**	*			
			b) <u>Review the workload of the Secretariat taking into account the priorities and the current human and financial resources.</u>	<u>Members and Secretariat</u>	*					
15	L/M		a) <u>Continue supporting and advocating adoption of boarding and inspection CMM in IOTC, noting that SBT is one of the species under the IOTC management mandate.</u>	<u>Members</u>	*	*				
			b) <u>Explore feasibility of establishing CCSBT's own boarding and inspection programme.</u>	<u>Members, Secretariat and CC</u>			*	*	*	
			c) <u>Consider improvement and strengthening of monitoring of vessels on the High Seas, including through utilization of information collected through existing mechanisms, including those of other tRFMOs.</u>	<u>Members</u>			*			

Commented [KR40]: Proposed by Korea for 2025/26

Commented [TW38]: Risk 14: Supported - to be done by the Secretariat in 2026/27 but did not propose any corresponding action item text

Commented [NZ39]: New Zealand supported the action items suggested by the Secretariat in the discussion notes (copied below).

- Review whether all current Secretariat analyses need to be continued and/or whether they need to be done annually – perhaps some items could be discontinued or done biennially instead, and/or;
- Review whether more automated data analysis and reporting processes can be introduced.

Commented [JP41]: Action 14 b) proposed by Japan.

Commented [KR44]: Proposed by Korea

Commented [KR45]: Proposed by Korea

Commented [TW42]: Risk 15 - Taiwan noted it: ".... would not recommend this risk item to be added at this time, since Taiwan's EMS is still an ongoing development and the data collected by the EMS is yet to be review and authenticate. As for the potential to hold Member-led fora to coordinate targeted High Seas patrols and inspections, Taiwan believes this involves sovereignty topic, which could be sensitive; therefore, there should be a formal discussion on the necessity of this kind of topic."

Commented [NZ43]: New Zealand supported increased information sharing between RFMOs, especially with regard to high seas monitoring and inspections, but did not propose an action item.

Commented [JP46]: Action item 15 c) proposed by Japan

Attachment C

Draft Compliance Action Plan (for 20254 to 20298 inclusive)

B. Ongoing Workplan

Risk Action Item Ref. No.	Reference Information for Issue being Addressed <i>(these columns could be deleted from the finalised CAP)</i>		Action Required to Address Risk/ Draft Strategic Plan/ Seabird Strategy	Responsibility (Members and/or the Secretariat)
	Risk Item No. & Matrix Score (H/M/L)	Draft Strategic Plan/ Seabird Strategy Ref No. <i>(if available/ relevant to the proposed action)</i>		
1	L/M		a) Routinely check and correct (e)CDS errors	
			b) Routinely assess market statistics to identify any widespread non-compliance	
2	M		a) <u>Run 6-monthly and annual (e)CDS reports, including developing new reports for Members and the Secretariat to run directly from the eCDS following its full implementation date</u>	Secretariat
			b) <u>Report on Members' implementation of the (e)CDS to CCSBT annually</u>	
3/4	H,L		a) Reconcile market and catch data	Members and Secretariat
5/6	M,L/M		a) <u>Report annually on Members' implementation of and compliance with CCSBT's Transshipment Resolution</u>	Secretariat
			a)b) <u>Ensure all transshipment observers are trained in CCSBT obligations (in the event that SBT is involved), including any cross-endorsed WCPFC ROP transshipment observers</u>	
7	M		a) <u>Share any available information/ intelligence that will assist with the identification of SBT reported as other species</u>	Members

Commented [NZ1]: Suggested streamlining to avoid duplication given the number of similar actions, but did not identify the duplicate action items.

Commented [Sec2]: This is the same as ongoing maintenance action item 19 from the previous CAP

Commented [SEC3]: This risk has been updated to "Support other RFMO transshipment programs to train observers with regard to CCSBT obligations" in attachment D, to better reflect the role of the Secretariat.

Commented [Sec4]: Similar to ongoing maintenance action item 17 from the previous CAP

8	L/M		a) Ongoing encouragement of NCNMs to provide information to CCSBT regarding potential catches of SBT	Members and Secretariat
			b) Members encouraged to share information about potential non-Member catches with the Secretariat e.g. under CCSBT's Information Collection and Sharing Policy (CPG4)	Members
9	M/H		a) <u>Provide assistance to Members to submit outstanding scientific observer data promptly</u>	Members and Secretariat
			b) <u>Encourage Members to consider using EM as a source of scientific data observations where it may be difficult to employ human observers</u>	
10	H		a) <u>Provide an annual summary of any non-compliance detected with respect to the collection and provision of non-SBT bycatch information.</u>	Members and Secretariat
			a) <u>Ongoing sharing of information and best practice MCS to assist developing Members and Cooperating Non-Members to implement and comply with the CCSBT's CMMs, including a capacity building workplan if appropriate</u>	Members and Secretariat
11/12/13/ 14			b) <u>Review Compliance Plans, policies and CMMs regularly as required including adding updates, enhancements, and checking they are fit for purpose and not duplicative</u>	
			c) <u>Annually monitor and report on implementation and compliance with CCSBT CMMs including consideration of novel ways to track progress with resolving persistent non-compliance issues</u>	
			d) <u>Maintain and strengthen relationships, including information exchange with other RFMOs and relevant international networks, in particular to assist with matters relating to CMMs, and monitoring and reporting</u>	
General			e) <u>Whenever a proposal is submitted, assess whether the proposal would impose additional work on the Secretariat and estimate expected workload/hours (low/moderate/significant/high). Consider and discuss the proposal, including possible options to address the additional workload, if significant or high, on the Secretariat.</u>	

Commented [SEC5]: This risk has been updated in Attachment D to "Support Members who are considering using EM as a source of scientific data observations where it may be difficult to employ human observers".

Commented [ID6]: Proposed by Indonesia but originally as an Action Plan item to address risk number 15; the Secretariat has moved this proposal to the Ongoing Workplan where Indonesia agrees it fits better

Commented [Sec7]: This is similar to part of ongoing maintenance action item 18 in the previous CAP

Commented [Sec8]: Similar to maintenance action item 21 in the previous CAP

Commented [Sec9]: Taken from item 7i of the Action Plan of the 2023 - 2028 Strategic Plan

Commented [Sec10]: Depending on what action item(s) Members propose to add to address risk item 13 in the main Action Plan (A), the last part of this proposed on-going workplan action could potentially be duplicative in which case it could be deleted

Commented [Sec11]: Similar to CAP maintenance action item 15 in the previous CAP

Commented [KR12]: Proposed by Korea in relation to risk item 14

Attachment D

Draft Compliance Action Plan (for 20254 to 20298 inclusive)

A. Compliance Action Plan

RiskAction Item Ref. No.	Risk Item No. & Matrix Score (H/M/L)	Action Required to Address Risk/ Draft Strategic Plan/ Seabird Strategy	Responsibility (Members and/or the Secretariat)	20254	20265	20276	20287	20298	
1. Non-compliance with the (e)CDS or incorrect information in (e)CDS documents.	L/M	a) To continue to move towards implementation of the eCDS as soon as possible.	Members and the Secretariat	*	*	*	*		
		b) Expedite (e)CDS capacity building for Members and Member stakeholders. ¹	Members and the Secretariat	*	*	*	*	*	
		c) Routinely check and correct (e)CDS errors.		Ongoing					
		d) Routinely assess market statistics to identify any widespread non-compliance.		Ongoing					
2. Incomplete implementation or submission of (e)CDS data including Non-Members not cooperating with	M	a) Extend the availability of the (e)CDS to some key identified Non-Members.	Members and the Secretariat	*	*		*		
		b) Continue (e)CDS Member capacity building by the Secretariat. ^{1,2}	Members and the Secretariat	*	*	*	*	*	
		c) Run 6-monthly and annual (e)CDS reports, including developing new reports for	Secretariat	Ongoing					

Commented [NZ1]: Questioned if this need to extend to 2027, given the eCDS is meant to be fully implemented by 2026.

Commented [JP2]: Suggested deleting asterisks from 2027 onwards noting that eCDS is scheduled to start on 1st January 2026 unless otherwise decided by EC.

Commented [NZ3]: Suggested prioritising getting Members using the eCDS and pushing the timeline for this out until after full implementation of the eCDS i.e. after the bugs are worked out and Members are using it consistently.

Commented [NZ4]: New Zealand suggested this should specify Member capacity building.

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¹ Part of the broader capacity building plan that will be developed by the Commission

the CDS Resolution.		<u>Members and the Secretariat to run directly from the eCDS following its full implementation date.</u>						
		<u>d) Report on Members' implementation of the (e)CDS to CCSBT annually.</u>	<u>Secretariat</u>	<u>Ongoing</u>				
3. Incomplete reporting of SBT mortalities.	H	a) Capacity building. ¹⁴	Members and the Secretariat	*	*	*	**	*
		b) Members self-describe how they obtain SBT mortality figures and review mortality reporting requirements.	Members, Secretariat and ESC	*	*	*	*	
		c) Consider strengthening corrective actions policies.	Members	*	*			
		d) Reconcile market and catch data.	Members and Secretariat	Ongoing				
4. Not fully attributing all SBT mortalities (such as recreational catch, artisanal catches, discards, farm sector catches, non-farm commercial sector catches) against national allocations.	L	a) <u>Members self-describe how they monitor, estimate and report all SBT mortalities. Discuss each Member's description/explanation and explore suggestions for possible improvement (CC).</u>	<u>Members Secretariat and CC</u>		*	*	*	*
		b) <u>Further effort by each member to improve and strengthen its estimate on the actual catch amount for each element outlined at paragraph 4 (b) of the limited carry-forward resolution.</u>	<u>Members</u>					
		c) Reconcile market and catch data.	Members and Secretariat	Ongoing				

Formatted: Footnote Reference

Commented [NZ5]: Questioned whether this is already done, and suggested incorporating it into Member's regular reporting requirements.

Commented [KR8]: Action item proposed by Korea to be done by Members and the CC in 2028/29

Commented [TW6]: Noted support of risk item 4 being done by Members and the Secretariat in 2026/27 but did not propose any corresponding action item text

Commented [NZ7]: New Zealand stated support for the intent of the Secretariat's discussion points provided for risk item 4, but did not propose a specific action item.

Commented [JP9]: Proposed by Japan, but no time frame for this was specified.

5. Non-compliance associated with transhipment obligations (both in port and at-sea).	M	a) Review if arrangements have been implemented to ensure transhipment obligations are in place <u>and report back to the Compliance Committee (CC).</u>	Members	*	*	*	*	
		b) Review of compliance with transhipment obligations and what actions can be taken in the case of non-compliance of Members or NCNM Carrier Vessels <u>and report back to the CC.</u>	Members and the Secretariat		*	*		
		c) <u>Report annually on Members' implementation of and compliance with CCSBT's Transhipment Resolution.</u>	Secretariat	Ongoing				
6. Incomplete submission of transhipment information including transhipment information for non-Member flagged vessels.	L/M	a) <u>Strengthen CCSBT's Transhipment Resolution including considering the introduction of supply declarations in 2025.</u>	Members	*	*			
		b) Improve and enhance the existing information sharing arrangements between CCSBT and other RFMOs with respect to transhipment information.	Members and Secretariat		*			
		c) <u>Introduce relevant punitive measures as part of a more comprehensive Corrective Actions approach (review of Corrective Actions Policy).</u>	Members and Secretariat	*	*			
		d) Examine the feasibility of increasing the 5% inspection requirement for foreign fishing/carrier vessels landing/transshipping SBT in port <u>and report back to the CC.</u>	Members and Secretariat		*		*	*

Commented [JP10]: Suggested deleting the asterisks for 2026 and 2027 and added for 2025 noting that in 2025, the Compliance Committee will consider the introduction of supply declarations and review the performance in relation to special arrangement for at-sea transhipment based on QAR. Japan also suggested adding an asterisk for 2028 suggesting that the next review of the Resolution should be conducted after certain period, e.g. 3 years.

Commented [NZ13]: Suggested this could be pushed out in the timeline but did not specify a suggested timing.

Commented [Sec11]: The Secretariat has proposed adding a reporting back element (tracked) to some of the proposed existing action items (tracked - see risk items 5, 6 and 7)

Commented [NZ12R11]: New Zealand supported this idea

Commented [AU14]: Australia noted this action item needs to be more specific but did not provide any suggestions

Commented [Sec15R14]: The Secretariat has added in the required consideration of Supply Declarations to provide more specificity

Commented [Sec16]: Australia suggested deleting the asterisk for 2025, however the Secretariat notes that CCSBT's Transhipment Resolution requires consideration of the introduction of Supply Declarations during 2025, so the 2025 asterisk has been retained.

Commented [AU17]: Australia suggested this may be an ongoing item and suggested deleting the 2025 timeframe asterisk

Commented [Sec18]: Secretariat notes that this is currently part of the discussion related to review of CPG3 and may need to be updated to reflect outcomes of those discussions.

Commented [JP19]: Suggested moving the asterisk to 2029, noting it is more appropriate to review the Resolution on Port Inspection after and based on review of the Resolution on transshipment in 2025.

		<u>e) Support other RFMO transshipment programs to train observers with regard to CCSBT obligations.</u>	<u>Secretariat</u>	<u>Ongoing</u>				
7. SBT mis-reported as other (non SBT) species.	M	a) Continue work on development of in-situ real-time genetic testing kits to identify SBT <u>and report progress to the CCSBT annually.</u>	Members	*	*	*	**	*
		b) Develop SBT species identification guidelines for distribution.	Members	*		**		*
		c) Consider the costs and benefits of genetic testing in markets and whether to conduct such testing <u>and report back to the CC.</u>	Members and Secretariat			*		
		d) Consider the feasibility of transshipment observers taking tissue samples as part of the IOTC/ICCAT transshipment observer programmes <u>and report back to the CC.</u>	Secretariat	*		*	*	
		<u>e) Share any available information/intelligence that will assist with the identification of SBT reported as other species.</u>	<u>Members</u>	<u>Ongoing</u>				
8. Catches of SBT that are not reported by Non-Cooperating Non-Members (NCNMs) and so not taken into account.	L/M	a) Members who are IOTC Members: i) Encourage IOTC to report SBT catch, and ii) Propose a revision to IOTC's Transshipment Resolution to require transshipment observers to pay special attention in cases where NCNMs are transshipping at-sea in SBT	Members	*		*		

Commented [JP20]: Stated support to give priority to Actions a) and c) and suggested that action (d) should occur after a) and c) so that a) and c) can be the focus in the first part of the next period.

Commented [Sec21]: Similar to ongoing maintenance action item 17 from the previous CAP

Commented [AU22]: Australia noted: "we should discuss whether this is for Members, or would be more effective if it came from the Exec Sec, on behalf of Members"

		distribution areas and have not declared SBT.						
		b) Ongoing encouragement of NCNMs to provide information to CCSBT regarding potential catches of SBT.	Members and Secretariat					Ongoing
		c) Share information about potential non-Member catches with the Secretariat e.g. under CCSBT's Information Collection and Sharing Policy (CPG4).	Members					Ongoing
9. Insufficient scientific observer data to manage target and non-target species.	M/H	a) Enhance the reliability of logbook information through the use of EM for use of ERS reporting.	Members		*			
		b) Consider the costs and benefits of increasing scientific observer percent coverage levels and/or the EM review rate taking into account consideration by ESC regarding data collection through EM and report back to the CC.	Members		*	*		
		c) <u>Provide assistance to Members to submit outstanding scientific observer data promptly.</u>	<u>Members and Secretariat</u>					<u>Ongoing</u>
		d) <u>Support Members who are considering using EM as a source of scientific data observations where it may be difficult to employ human observers.</u>	<u>Members and Secretariat</u>					<u>Ongoing</u>
		e) <u>Capacity building on the EMS to correctly understand what is EMS, how it can be attributed and monitor and conduct</u>	<u>Members and Secretariat</u>					<u>Ongoing</u>

Commented [AU23]: Australia suggested updating the text "Enhance" to "Potentially enhance" - the Secretariat notes the draft text presented here was agreed by CC18

Commented [JP24]: Japan suggested action (a) can be of a more general nature and mention wider approaches, since Risk 9 related to both target and non-target species. Japan stated they did not think there was a need to focus on logbook and use of EM for ERS reporting, noting there could be other methods to improve the scientific observer data. Japan suggested the following alternative text for this action:

- *Consider methods for enhancing the reliability of logbook information and scientific observer data through appropriate verification methods, including the use of EM, for target and non-target species.*

		<u>independent EMS review and report back to CCSBT.</u>						
10. Incomplete or inaccurate reporting of non SBT bycatches, including seabirds.	H	a) <u>Training and awareness programmes put in place including making updated ACAP resources available e.g. seabird identification guide, observer guidelines and fact sheets.</u>	Members, Seabird Project, ACAP	*	*	-	-	
		b) i) <u>Use feather sampling kits to aid with seabird identification.</u> ii) <u>Consider then develop an e-application to assist with seabird/feather identification.</u>	Members		*	*		
		c) <u>Initiate a project to coordinate feather sampling through a key Member or Members.</u>	Members		*	*		
		d) <u>Provide an annual summary of any non-compliance detected with respect to the collection and provision of non-SBT bycatch information.</u>	Members and Secretariat	Ongoing				
11. CCSBT Members not fully implementing specific Conservation and Management Measures (CMM's) as agreed, particularly the	L	a) <u>Consider the need to nominate seabird bycatch measures for vessels, for inclusion on the CCSBT authorised vessel register, or otherwise.</u>	Members		*		*	
		b) <u>Ensure members of CCSBT understand the Measures of other relevant tuna RFMOs (i.e., ERS, EM).</u>	Members		*		*	

Commented [ID25]: Proposed by Indonesia

Commented [JP26]: Japan noted that the proposed Actions (a) - (c) appear in the Multi-year Seabird Strategy and suggested to delete the three proposed actions and refer to objective 2 of the Strategy here to avoid duplication or inconsistency between this Action Plan and the Seabird Strategy. Suggested alternative text from Japan:

Implement necessary actions stipulated in Multi-Year Seabird Strategy to achieve the objective 2 which is to ensure the collection of reliable data.

Responsibility: ERSWG Members, ACAP

Commented [NZ27]: NZ noted that their primary method for seabird identification is EM rather than feather samples. So suggested that prioritising EM/camera identification should also be an option/considered (while still acknowledging the usefulness of feather sampling).

Commented [Sec28]: This is similar to part of ongoing maintenance action item 18 in the previous CAP

Commented [NZ29]: New Zealand supported the action items suggested by the Secretariat in the discussion notes (copied below), and questioned if it made sense to push these out on the timeline (i.e. 27/28) to occur after the review of the corrective actions policy, noting that these are newer risk items.

- Secretariat to contact IOTC, ICCAT and WCPFC to request and obtain the following details for CCSBT Members fishing for SBT within their areas of competency:
- What information do those tRFMOs currently collect on the implementation of ERS and VMS measures, and
- How does each tRFMO determine if its ERS and VMS measures were fully implemented per Member each year/season, and

Commented [AU30]: Proposed by Australia

Commented [ID31]: Action items 11 b) and c) proposed by Indonesia

binding ERS measures of IOTC, ICCAT and WCPFC.		c) <u>Estimate of uncertainty from unreported catch (in particular from recreational and small-scale fishers).</u>	<u>Members</u>		*		*	
		e)d) <u>Consider additional domestic monitoring and surveillance measures for further ensuring full implementation of all CMMs.</u>	<u>Members</u>					*
		e) <u>Consider a CCSBT mechanism for reviewing each member's implementation status of CMMs, including the binding ERS measures of other tRFMOs, including through collection of relevant information from other tRFMOs.</u>	<u>Members and Secretariat</u>					*
		f) <u>Ongoing sharing of information and best practice MCS to assist developing Members and Cooperating Non-Members to implement the CCSBT's CMMs, including a capacity building workplan if appropriate.</u>	<u>Members and Secretariat</u>	<u>Ongoing</u>				
12. CCSBT Members not fully complying with the obligations of specific Conservation and Management Measures (CMM's) as agreed,	H	a) <u>Capacity building for vessel crew of developing state on binding ERS measures.</u>	<u>Members</u>		*	*		
		b) <u>Assistance in raising awareness of the industry to provide funding from investment for additional equipment procurement for binding ERS measures.</u>	<u>Members</u>		*	*		

Commented [JP32]: Action items 11 d) and e) proposed by Japan who also noted they had proposed similar actions for both risks 11 and 12, as they felt risks 11 and 12 were very similar.

Commented [Sec33]: Similar to maintenance action item 21 in the previous CAP

Commented [SEC34R33]: In the ongoing workplan provided to Members, this risk had combined 'implementing' and 'complying' with the CCSBT CMMs. But these have been split to allow it to be applied under both risks 11 and 12.

Commented [TW35]: Risks 11 & 12 - Taiwan noted: Considering that there have already been a proposed ongoing action item relating to this issue and the heavy workload that the Secretariat is having, Taiwan would recommend not to add this risk item for now

Commented [NZ36]: New Zealand supported the action items suggested by the Secretariat in the discussion notes (copied below), and questioned if it made sense to push these out on the timeline (i.e. 27/28) to occur after the review of the corrective actions policy, noting that these are newer risk items.

- Secretariat to contact IOTC, ICCAT and WCPFC to request and obtain the following details for CCSBT Members fishing for SBT within their areas of competency:
- Do they assess compliance with ERS and VMS measures annually (or less often) and what is considered to be full compliance, and
- What are the results (e.g. rates of compliance) with ERS/VMS CMMs for each relevant CCSBT Member per year/season over the past several years.
- Members to determine whether the ERS and VMS compliance assessments conducted by IOTC, ICCAT and WCPFC meet the needs of the CCSBT.

Commented [ID37]: Action items 12 a) and b) proposed by Indonesia

Commented [JP38]: Action item 12 c) proposed by Japan who also noted they proposed similar Actions for Risks 11 and 12, as they felt risks 11 and 12 were very similar.

particularly the binding ERS measures of IOTC, ICCAT and WCPFC.		<u>b)c) Consider additional domestic measures for further ensuring full compliance with all CMMs.</u>	<u>Members</u>		*				
		<u>d) Consider a CCSBT mechanism for reviewing each member's compliance status of CMMs, including the binding ERS measures of other tRFMOs, including through collection of relevant information from other tRFMOs.</u>	<u>Members and Secretariat</u>			*			
		<u>e) Ongoing sharing of information and best practice MCS to assist developing Members and Cooperating Non-Members to comply with the CCSBT's CMMs, including a capacity building workplan if appropriate.</u>	<u>Members and Secretariat</u>	<u>Ongoing</u>					
13. Lack of systematic follow-up actions to address non-compliance leading to persistent non-compliance.	<u>M</u>	<u>a) Review necessity for systemic follow-up actions, taking into account the potential updating of CPG3, and agreement at CC18 that Secretariat identifies compliance issues for each Member and sets these out in a letter to each Member for it to report on how it has addressed each item at the next CC.</u>	<u>Members and Secretariat</u>		**	*			
		<u>b) Annually monitor and report on implementation and compliance with CCSBT CMMs including consideration of novel ways to track progress with resolving persistent non-compliance issues.</u>	<u>Members and Secretariat</u>	<u>Ongoing</u>					

Commented [JP39]: Action items 12 c) and d) proposed by Japan.

Commented [Sec40]: Similar to maintenance action item 21 in the previous CAP

Commented [JP43]: Action item 13 a) proposed by Japan.

Commented [TW41]: Risk 13: Supported - to be done by the Secretariat in 2025/26 but did not propose any corresponding action item text. Taiwan noted, "there should be a further discussion on the potential of the letters and responses being publicly available due to privacy issue."

Commented [NZ42]: New Zealand suggested that the Secretariat compile a report with all noncompliance assembled in one place and that this report could be updated to track progress against items. New Zealand felt this would make it easier for Members to understand and address non-compliance.

14. The increasing demands of work limiting the ability of the Secretariat to assess compliance.	M/H	a) <u>Review current and future (expected) workload of the Secretariat and discuss possible solutions.</u>	Members and Secretariat	*	**	*		
		a)b) <u>Review the workload of the Secretariat taking into account the priorities and the current human and financial resources.</u>	Members and Secretariat	*				
		c) <u>Whenever a proposal is submitted, assess whether the proposal would impose additional work on the Secretariat and estimate expected workload/hours (low/moderate/significant/high). Consider and discuss the proposal, including possible options to address the additional workload, if significant or high, on the Secretariat.</u>	Members and Secretariat	Ongoing				
15. Lack of comprehensive monitoring and inspection of vessels on the High Seas.	L/M	a) <u>Continue supporting and advocating adoption of boarding and inspection CMM in IOTC, noting that SBT is one of the species under the IOTC management mandate.</u>	Members	*	*			
		b) <u>Explore feasibility of establishing CCSBT's own boarding and inspection programme.</u>	Members, Secretariat and CC			*	*	*
		c) <u>Consider improvement and strengthening of monitoring of vessels on the High Seas, including through utilization of information collected through existing mechanisms, including those of other RFMOs.</u>	Members			*		

Commented [KR46]: Proposed by Korea for 2025/26

Commented [TW44]: Risk 14: Supported - to be done by the Secretariat in 2026/27 but did not propose any corresponding action item text

Commented [NZ45]: New Zealand supported the action items suggested by the Secretariat in the discussion notes (copied below).

- Review whether all current Secretariat analyses need to be continued and/or whether they need to be done annually – perhaps some items could be discontinued or done biennially instead, and/or;
- Review whether more automated data analysis and reporting processes can be introduced.

Commented [JP47]: Action 14 b) proposed by Japan.

Commented [KR48]: Proposed by Korea in relation to risk item 14

Commented [KR51]: Proposed by Korea

Commented [TW49]: Risk 15 - Taiwan noted it: "... would not recommend this risk item to be added at this time, since Taiwan's EMS is still an ongoing development and the data collected by the EMS is yet to be review and authenticate. As for the potential to hold Member-led fora to coordinate targeted High Seas patrols and inspections, Taiwan believes this involves sovereignty topic, which could be sensitive; therefore, there should be a formal discussion on the necessity of this kind of topic."

Commented [NZ50]: New Zealand supported increased information sharing between RFMOs, especially with regard to high seas monitoring and inspections, but did not propose an action item.

Commented [KR52]: Proposed by Korea

Commented [JP53]: Action item 15 c) proposed by Japan

<u>General</u>		a) <u>Maintain and strengthen relationships, including information exchange with other RFMOs and relevant international networks, in particular to assist with matters relating to CMMs, and monitoring and reporting.</u>	<u>Members and Secretariat</u>	<u>Ongoing</u>
		b) <u>Review Compliance Plans, policies and CMMs regularly as required including adding updates, enhancements, and checking they are fit for purpose and not duplicative.</u>	<u>Members and Secretariat</u>	<u>Ongoing</u>

Commented [SEC54]: General risks a) and b) have been moved from the risk 11/12/13/14 grouping due to the number of risks that these actions can contribute to addressing.

Commented [Sec55]: Similar to CAP maintenance action item 15 in the previous CAP