



CCSBT-CC/2410/07

## Draft Compliance Action Plan (CAP) for 2025 – 2029 2025 – 2029 年遵守行動計画 (CAP) 案

### 1. INTRODUCTION

#### 序論

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.

遵守行動計画 (CAP) は[遵守計画](#)を実現するための重要な要素となっており (別添 1 を参照)、優先度が高いものとして合意された一連の遵守リスクに対処するための具体的なスケジュールを含む CCSBT としてのプロジェクト行動事項及び継続的な遵守関連作業を規定している。

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”*.<sup>1</sup>

CCSBT が改定した 2023 年から 2028 年までの戦略計画には、特に項目番号 5i として「パフォーマンス・レビュー勧告を踏まえ、緊急課題として、2018 – 2020 年の行動計画を次の 5 年間に向けて更新又は修正する」ことが規定されている。

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:

2023 年に CAP の改定作業が開始された。第 4 回遵守専門作業部会 (TCWG) は 15 件の遵守リスクを特定し、またこれらのリスクに対応するための CAP 行動事項を特定するための作業が TCWG 4 及び第 18 回遵守委員会会合 (CC 18) の両方において進められた。しかしながら、CC 18 ではこの作業を完了するための十分な時間がなく、以下が合意された。

*“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.”*

「38. …CAP の策定作業は文書通信を通じて休会期間中に継続可能と考えられること、及び CAP 案を 2024 年の TCWG 5 (開催される場合) 及び CC 19 において最終化すること…」

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.

TCWG 5 会合は CC 19 会合に統合されており、戦略計画のゴールを達成するために

---

<sup>1</sup> The reasons for the CAP being significantly out-of-date are noted in the background section (2) CAP の対象期間から長期間経過している理由は背景セクションの (2) に記載した。

は、CC 19 会合期間中に事務局及びメンバーが CAP 案の策定作業を完了することが重要となる。

This paper provides:

本文書では以下を提示する。

- Some general background material including a summary of the intersessional correspondence process;  
休会期間中の連絡プロセスの概要を含む、いくつかの全般的な背景情報
- The current draft list of compliance risks from CC18 (**Attachment A**);  
CC 18 由来の現状の遵守リスク一覧案 (別紙 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  
TCWG 4/CC 18 で検討が開始された CAP 行動事項案 (A) 及び継続的作業計画 (B)。なお、休会期間中の連絡プロセスでメンバーから受領した追加、更新及びコメントを含む (それぞれ別紙 B 及び別紙 C)。
- A combined draft CAP that includes the specific and ongoing actions (from both Attachments B & C) together under the associated risks (**Attachment D**).  
関連するリスクごとに統合した CAP 案 (別紙 B 及び C の両方の具体的な行動及び継続的行動事項を含む) (別紙 D)

## 2. BACKGROUND

### 背景

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

過去 5 年間の CAP の更新に対して大きな影響を及ぼすいくつかの重要な決定がなされている。

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

2019 年の第 14 回遵守委員会会合 (CC 14) は、

*“... 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’.”<sup>2</sup>*

「常設議題項目の一部として毎年徹底的にレビューすること及びこれ故に「生きた文書」と見なすことを条件に、2021 年以降は 5 年間の CAP とすることを勧告した。」

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

同勧告は CCSBT 26 により合意された。以前の CA は 3 年間を対象期間とするものであった。

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

---

<sup>2</sup> Paragraph 85 (dot-point 2) of CC14’s annual report CC 14 報告書パラグラフ 85 (2 ポツ目)

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.

この決定の後、COVIDに関連する大きな制約から、CAPの改定作業は遅延した。2020年から2022年までのCCSBT年次会合はCOVID-19の影響によりいずれもオンラインで開催され、またCC 15（2020年）は5カ年計画としてのCAPの改定についてのさらなる検討は次の適切な対面会合まで行うべきでないことに合意した。このため、改定CAPの検討は、2023年のTCWG 4及びCC 18における検討まで保留されることとなった。しかしながら、CC 18では改定CAP案を最終化するための十分な時間がなく、さらなる遅れを回避するためにはCC 19が本文書を最終化することが必要不可欠となっている。

### 3. INTERSESSIONAL PROCESS

#### 休会期間中のプロセス

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

事務局は、CAP案に関する作業を継続するべく。2024年3月から4月の間に休会期間中の連絡グループの作業をリードした。

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.

メンバーへの参考として、また行動計画の検討に資するよう、合意済となっている15件の遵守リスク一覧が提供された。メンバーに対しては、休会期間中のプロセスにおいて既に合意済のリスク一覧にさらなるフィードバックを行うことは要請されなかった。

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

メンバーがコメント、追加及び修正案を提出できるよう、以下の文書が提供された。

- 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).  
行動計画案 (A)。TCWG 4/CC 18では行動事項が提案されなかった各項目／リスク（すなわちリスク項目4及び11–15）に関する一連の検討用注記を含む資料
- 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.  
継続的作業計画 (B)。リスク2、7及び9–14に関する継続的行動及び責任に関する提案、及び事務局が起草及び追加した一般的カテゴリを含む資料

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.

EU及び南アフリカを除く全メンバーからコメント及び／又は文言の追加／修正提案

を受領した。受領したフィードバックは全て見え消し修正／コメントとして別紙 B、C 及び D に取り入れられている。事務局は、事務局は、TCWG 4/CC 18 が対応する時間がなかった遵守リスクに対処するための行動事項がメンバーから提案されたことに留意したい。しかしながら、提案された行動項目の中には一部重複があり、これらについては検討及び解決を要する。継続的作業計画に対するメンバーからのコメントは 3 件のみであり、これを踏まえて文書案に 2 点の行動項目を追加した。

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.

メンバーにとって重要なのは、合意されたリスクに効果的に対処することを確保するべく、提案されたすべての行動（具体的な行動事項及び継続的行動事項）を包括的に検討することである。このため事務局は、メンバーによる検討に向けて、別紙 D として全ての行動事項を取りまとめた。

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

各メンバーから提出された提案及びコメントの概要は以下のとおりである。

#### Australia

##### オーストラリア

- Provided proposed updated timeframes for various action items;  
複数の行動項目のスケジュールのアップデートを提案した。
- Provided a proposed action item for risk 11;  
リスク項目 11 に関する行動事項を提案した。
- Provided specific comments on risk items 8 (responsible party) and a proposed amendment to already agreed draft action item 9; and  
リスク項目 8 に関するコメントを行い、既に合意されているリスク項目 9 の行動案に対する修正案を提出した。
- 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.  
オーストラリアは事務局の作業量（他の RFMO との ERS 及び VMS の遵守の相互検証に伴う作業量を含む）に留意しているとした全体的なコメントを行った。

#### Indonesia

##### インドネシア

- Provided proposed updated timeframes for many action items;  
多数の行動事項のスケジュールの変更を提案した。
- 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  
リスク項目 11、12 及び 15 に対処するための行動事項を提案したものの、後者の提案については、インドネシアの合意の下に事務局が継続的行動計画事項 9c に移動した。
- Did not provide any comments on the Ongoing Workplan.  
継続的行動事項に関するコメントは行わなかった。

## Japan

### 日本

- 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;  
概ね行動事項がなかった多数の項目に対して提案を行ったが、既存の行動事項に関しても一部の文言及びスケジュールに対する変更提案を行った。
- 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;  
リスク項目 9 に規定された三つの行動項目について、日本としては提案されている行動が既に海鳥戦略の中に含まれていると考えていることを指摘しつつ、海鳥戦略の目標 2 に合わせて一つの項目にまとめることを提案した。
- 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;  
リスク項目 9 は漁獲対象種と非漁獲対象種の両方に適用され得ることからより一般的で幅広いアプローチに言及することが考えられることを述べつつ、行動項目 a) として新たな文言を提案した。
- Identified priority actions for risk number 7; and  
リスク項目 7 において優先度の高い行動事項を特定した。
- 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).  
転載決議のレビュー（補給申告書の導入が提案されている 2025 年に実施予定）の後に、その結果を踏まえて港内検査決議をレビューすることがより適切であるとの提案を行った。

## Korea

### 韓国

- Proposed action item to address risk numbers 4, 14 and 15;  
リスク項目 4、14 及び 15 に対処するための行動事項を提案した。
- Collaborated with the Secretariat to propose more details on a draft process associated with proposed action item 14;  
リスク項目 14 に対する行動事項提案に関連するプロセスのより詳細な提案を行うため、事務局と共同で作業を行った。
- Noted it had no specific suggestions to address risks 11, 12 and 13 and supported the suggestions/comments from the Secretariat; and  
リスク項目 11、12 及び 13 に対処するための具体的な提案はなかったが、事務局による提案／コメントを支持した。
- 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.  
リスク項目 14 に関して提案された行動事項をサポートするものとして、継続的作業計画の中で大括り化したリスク項目 11/12/13/14 に対処するための事項 e) を提案した。（別紙 C - 別紙 D では行動事項 14c) として含まれているもの）

## New Zealand

### ニュージーランド

- 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;  
eCDS 関連のリスク（1 及び 2）に対処するための行動事項はメンバーに優先度を置くべきであり、非メンバーに焦点を当てた事項についてはメンバーが eCDS を一貫して使用するようになるまでスケジュールから除外することを提案した。
- 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;  
ニュージーランドが海鳥類を特定するための一義的な手法は羽のサンプリングではなく EM であることを指摘し、EM の優先度はリスク項目 10 に対処するためのオプションとすべきことを提案した。
- Supported the addition of the reporting back requirement to specific actions to address risk items 5, 6 and 7;  
リスク項目 5、6 及び 7 に対処するための具体的な行動として報告要件を追加することを支持した。
- 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;  
リスク項目 4、11、12 及び 14 に対処するために考え得る行動事項に関する事務局の議論を支持したが、これらのリスクに係る具体的な行動については特定しなかった。
- 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;  
リスク項目 13 に対処するため、事務局が全ての非遵守を網羅した報告書を取りまとめ、各行動事項に対する進捗状況を追跡すべくアップデートしていくことを提案した。ニュージーランドは、全てのメンバーが非遵守を理解しこれに対処することを容易にするものと考えている。
- Supported increased information sharing between RFMOs to address risk number 15, especially with regard to high seas monitoring and inspections; and  
リスク項目 15 に対処するため、RFMO 間での情報（特に公海でのモニタリング及び検査に関する情報）の共有を強化することを支持した。
- Suggested streamlining the Ongoing Workplan to avoid duplication, given the number of similar actions, but did not identify any specific actions of concern.  
多数の行動事項が築地していることを踏まえ、重複を避けるべく継続的作業計画を整理することを提案したが、懸案となる具体的な行動項目は指定しなかった。

## Taiwan

### 台湾

- Supported adding action items to address risks 4 and 14 but did not propose any specific text, although did propose responsibility and timeframes;  
リスク項目 4 及び 14 に対する行動事項の追加を支持したが、具体的な文言は提案せず、責任及びスケジュールに関する提案を行った。

- Proposed some updated timeframes for actions to address risk 7;  
リスク項目 7 に対処するための行動事項に関する一部のスケジュール変更を提案した。
- 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 time-frames;  
プライバシーの関係から公開される可能性があるレター及びそれへの回答に関してはさらなる議論が必要とすることを指摘しつつ、リスク項目 13 を提案した。
- Recommended not adding action items to address risks 11, 12 and 15; and  
リスク項目 11、12 及び 15 に対処するための追加的な行動項目は勧告しなかった。
- Had no comments on the Ongoing Workplan.  
継続的作業計画に関するコメントはなかった。

#### 4. RECOMMENDED ACTIONS

##### 勧告されている行動

CC19 is invited to:

CC 19 は以下を招請されている。

- Consider, complete and recommend a draft five-year Compliance Action Plan (CAP) for 2025 to 2029 to EC 31 which:  
以下を含む 2025 年から 2029 年を対象とする 5 年間の行動計画 (CAP) 案について検討し、作業を完了し、及び EC 31 に対して勧告すること。
  - Includes a list of agreed Compliance Risks including the assessed magnitude of each risk (high/medium/low);  
各リスクの影響度 (高/中/低) の評価を含めて合意された遵守リスク一覧
  - Includes a set of specific project and ongoing action items that together effectively address each of the compliance risks;  
全体として各遵守リスクに効果的に対処するための一連の具体的なプロジェクト行動事項及び継続的行動事項
  - Identifies the responsibilities assigned to each action item; and  
各行動事項に割り当てられた責任者
  - Identifies the timeframe within which each action item should be completed.  
各行動事項を完了すべき実施スケジュール
- 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.  
事務局に対し、2023 年 10 月に採択された 2023 – 2028 年 CCSBT 戦略計画との整合性を評価するべく現行遵守計画のレビュー及び評価を行うよう勧告すること。当該評価の結果は、メンバーによる検討に資するよう、また CC 21 に提出予定の改定遵守計画へのインプットとして CC 20 に提示されることとなる。

- 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.

CCSBT 26 での合意のとおり CAP を「生きた文書」として毎年徹底的なレビューを行うべく、CC 20 以降の CC 会合における常設議題項目にこれを追加するよう勧告すること。

**Prepared by the Secretariat**  
事務局作成文書



## Attachment A

**Table 1: List of Compliance Risks Identified for the 202~~5~~<sup>4</sup> - 202~~9~~<sup>8</sup> 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 <b>implementing</b> 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 <b>complying with the obligations</b> 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. <sup>1</sup>	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. <sup>1,2</sup>	Members and the Secretariat	*	*	*	*	*	
3	H	a) Capacity building. <sup>1,2</sup>	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.

**Formatted:** Footnote Reference, Font color: Auto

**Formatted:** Footnote Reference

<sup>1</sup> 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>e)d) Consider additional domestic monitoring and surveillance measures for further ensuring full implementation of all CMMs.</u>	Members									*	-
			<u>e) 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>	Members and Secretariat									*	-
12	H		<u>a) Capacity building for vessel crew of developing state on binding ERS measures.</u>	Members	*	-	*	-						
			<u>b) Assistance in raising awareness of the industry to provide funding from investment for additional equipment procurement for binding ERS measures.</u>	Members	*	-	*	-						
			<u>b)c) Consider additional domestic measures for further ensuring full compliance with all CMMs.</u>	Members			*	-						
			<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>	Members and Secretariat						*	-			
13	M		<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</u>	Members and Secretariat	*	*	*	-						

**Commented [JP29]:** 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 [ID32]:** Action items 12 a) and b) proposed by Indonesia

**Commented [JP33]:** 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.

**Commented [TW30]:** 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 [NZ31]:** 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

**Commented [JP34]:** Action items 12 c) and d) proposed by Japan.

**Commented [JP37]:** Action item 13 a) proposed by Japan.

**Commented [TW35]:** Risk 13: Supported - to be done by the Secretariat in 2025/26 but did not propose any corresponding action item text.

**Commented [NZ36]:** 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

			<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

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)
	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 Transhipment Resolution</u>	Secretariat
			a)b) <u>Ensure all transhipment observers are trained in CCSBT obligations (in the event that SBT is involved), including any cross-endorsed WCPFC ROP transhipment 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 transhipment 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

<u>RiskAction</u> 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. <sup>1</sup>	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) <u>Extend the availability of the (e)CDS to some key identified Non-Members.</u>	Members and the Secretariat	*	*		*		
		b) Continue (e)CDS <u>Member</u> capacity building by the Secretariat. <sup>1±</sup>	Members and the Secretariat	*	*	*	*	*	
		c) <u>Run 6-monthly and annual (e)CDS reports, including developing new reports for</u>	<u>Secretariat</u>	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.

**Formatted:** Footnote Reference, Font color: Auto

<sup>1</sup> 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. <sup>14</sup>	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,	<b>H</b>	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