



**TECHNICAL AND COMPLIANCE COMMITTEE**  
**Eighteenth Regular Session**  
Electronic Meeting 21 – 27 September 2022

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**WCPFC COMPLIANCE MONITORING SCHEME AUDIT POINTS**  
**CMS-IWG SUPPLEMENTARY DRAFT**

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**WCPFC-TCC18-2022-10A**  
**24 August 2022**

**Paper by the CMS-IWG Lead on Audit Points**

WCPFC Compliance Monitoring Scheme  
AUDIT POINTS

*CMS-IWG Supplementary Draft*

*August 2022*

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## I. Updates

- a) The first draft of WCPFC Audit Points is contained in a document dated May 2022 which should be used as a reference for this Supplementary Draft. The May 2022 document remains unchanged since its circulation to the CMS-IWG and contains details on the obligation, applicability, data sources, and current WCPFC evaluation criteria. This Supplementary Draft builds on the May 2022 draft.
- b) On circulation of the May 2022 draft, the CMS-IWG were presented with options for progressing the audit points work intersessionally, noting the high volume of information and level of detail involved.
- c) The CMS-IWG supported the option to focus first on the 60 obligations agreed by WCPFC18 to be reviewed in the 2022 Draft Compliance Monitoring Report, covering RY2021 (to take place at TCC19). These obligations were indicated with an asterisk (\*) in the May 2022 CMS-IWG draft. **This Supplementary Draft dated August 2022 updates only those 60 obligations and incorporates feedback from CMS-IWG participants.**

*A note on cross-referencing: Every effort has been made to minimize cross-referencing and to promote consistency across multiple documents that are relevant for audit points development. The CMS-IWG AP draft follows the structure of the WCPFC Secretariat's SUGGESTED CHECKLIST OF 2022 REPORTING REQUIREMENTS UNDER CMMS OR OTHER WCPFC DECISIONS which is organized by thematic groupings.*

- d) The May 2022 draft overlooked to indicate that Pacific Bluefin Tuna CMM 2021-02 obligations are included in the list of obligations for the 2022 Draft CMR. Draft audit points for those obligations are included in this Supplementary Draft.
- e) Sharks CMM 2019-04 para 5 was missing from the May 2022 draft and is included in this Supplementary Draft as it is on the list of obligations for the 2022 Draft CMR.
- f) Section II below on Decision Points is provided to help guide discussions on the draft audit points with a view to making progress at TCC18.
- g) REMINDER: The CMS-IWG Work Plan commits the IWG to submitting a draft set of audit points to WCPFC19, covering obligations to be reviewed in the 2022 draft CMR at TCC19. To the extent possible, the CMS-IWG may include audit points for additional obligations for the consideration of WCPFC19.

## II. Decision Points

Topic	Questions and issues for consideration
1. Approach to evaluating compliance with Implementation (I) obligations	What is the appropriate information requirement for Implementation obligations, per paragraph 7(ii)(a). Should this information requirement be standardized?
2. Approach to evaluating compliance with Report (R) obligations	To what extent should the Secretariat be required to verify the information contained in the report versus confirming that a complete report was received, including by the relevant required deadline.
3. Approach to evaluating compliance with Limit (L) obligations	Note requirement in CMS CMM para 7(i) for <b>verifiable data</b> in respect of limits. If there is no verifiable data available, how should these assessments be handled? What is the appropriate mechanism to verify information reported by CCMs?
4. Data sources	Is there a need to clarify and make transparent the available sources for verifying and confirming implementation?
5. Applicability	Review of applicability needs to be undertaken for some obligations.
6. Obligations which potentially fall into more than one category	Clarify and confirm requirements for obligations that may fall into more than one category
7. Language in CMS CMM para 7(ii)(b)	Interpretation of “...and has taken action in relation to potential infringements” could be interpreted as a reference to cases in the CCFS, which are now presented in an aggregated report (no longer vessel-specific). Note also information requirements on CCM actions in relation to cases in the CCFS are addressed in Section IV of the CMM.

### III. List of obligations to be reviewed in 2022 draft Compliance Monitoring Report (covering 2021 activities)

Attachment S of WCPFC18 Summary Record

Key: To indicative Risk Rating

<b>Low</b>	<b>Moderate</b>	<b>High</b>	<b>Severe</b>
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	CMM	Para and risk rating	Description	Category
1	Sci Data	SciData 01	Estimates of Annual Catches	Report
2		SciData 02	Annual number of vessels active	Report
3		SciData 03	Operational Level catch and effort data	Report
4		SciData 05	Annual Size Composition Data	Report
5	Tropical Tuna Measure	2020-01:16	Purse seine 3-month FAD closure (July-Sept) for purse seine vessels in EEZ and HS.	Implementation
6		2020-01:17	Additional 2-month FAD closure on high seas (April/May/Nov-Dec)	Implementation & Report
7		2020-01:25	Restrict purse seine effort/catch within EEZ as notified in Table 1	Limit
8		2020-01: 26	Restrict high seas purse seine effort (20°N-20°S) - Table 2	Limit
9		2020-01:39	Restrict longline BET catch to limits set in Table 3	Limit
10		2020-01:41	Bigeye longline catch limits for 2021, with adjustment to be made for any overage in 2020 (Table 3)	Report
11		2020-01:43	Bigeye longline catch limits by flag for certain other members which caught less than 2000t in 2004	Limit
12		2020-01: 45	Limit by flag on number of purse seine vessels >24m with freezing capacity between 20N and 20S	Limit
13		2020-01: 47	Limit by flag on number of longline vessels with freezing capacity targetting bigeye above the current level (applying domestic quotas are exempt)	Limit
14		2020-01: 48	Limit by flag on number of ice-chilled longline vessels targetting bigeye and landing exclusively fresh fish above the current level or above the number of current licenses under established limited entry programmes (applying domestic quotas are exempt)	Limit
15		2020-01: Att2 03	Philippines vessels Entry/Exit reports for HSP1-SMA	Report
16		2020-01: Att2 05-06	Specific requirements for deploying observers on Philippines vessels fishing in HSP-1	Implementation
17		2020-02:02 (1)	Total effort by vessels for Pacific Bluefin limited to 2002 - 2004 levels in Area north of 20N	Limit
18		2020-02: 02 (2)	Catches of Pacific bluefin tuna less than 30kg shall be reduced to 50% of 2002-04 level. Overage or underage may be used in following year	Limit

19	<b>Pacific Bluefin Tuna</b>	<b>2020-02: 3</b>	Take measures not to increase catches of BFT >30kg from 2002-04 levels with some exceptions	<b>Implementation</b>
20		<b>2020-02: 5</b>	Report annually Pacific bluefin effort and catch <>30kg (3 years)	<b>Report</b>
21		<b>2020-02: 11</b>	Report annually on implementation of Pacific bluefin CMM (2,3,4,5,7,8,10,13)	<b>Report</b>
22	<b>South Pacific Albacore</b>	<b>2015-02: 04</b>	Annual report of SP ALB by vessel by species	<b>Report</b>
23	<b>NP Marlin</b>	<b>2010-01: 05</b>	NP striped marlin catch limits applicable to CCMs with vessels fishing in the Convention Area north of the equator: commencing 2011	<b>Limit</b>
24	<b>SWP. Marlin</b>	<b>2006-04: 01</b>	L Limit number of fishing vessels fishing for MLS south of 15S to 2000 – 2004 levels	<b>Limit</b>
25		<b>2006-04: 04</b>	Annual catches of MLS (bycatch), and annual numbers of vessels fishing for MLS south of 15S and their catch levels	<b>Report</b>
26	<b>Swordfish</b>	<b>2009-03: 01</b>	Limit number of vessels fishing for SWO south of 20S to the number in any one year between 2000-2005	<b>Limit</b>
27		<b>2009-03: 02</b>	Limit the catch of SWO by its vessels in area south of 20S to the amount in any one year during 2000-2006	<b>Limit</b>
28		<b>2009-03: 03</b>	CCMs shall not shift their fishing effort for SWO to the area north of 20°S	<b>Limit</b>
29		<b>2009-03: 08</b>	Report annually on total catch and effort for SWO S 20°S	<b>Report</b>
30	<b>RFV</b>	<b>2018-06: 03</b>	CCMs should only allow its fishing vessels to be used for fishing, if properly authorised	<b>Implementation</b>
31		<b>2018-06: 09</b>	Submission by Member to ED a list of all vessels on national record in previous year, noting "fished" or "did not fish" for each vessel	<b>Report</b>
32	<b>VMS</b>	<b>2014-02: 09a</b>	Fishing vessels comply with the Commission standards for WCPFC VMS including being fitted with ALC/MTU that meet Commission requirements	<b>Implementation</b>
33		<b>2014-02: 09a VMS SSPs 2.8</b>	Provision of ALC/MTU 'VTAF' data	<b>Implementation</b>
34	<b>Transshipment</b>	<b>2009-06: 11</b>	Annual report on all transshipment activities covered by this Measure (including transshipment activities that occur in ports or EEZs) in accordance with the specified guidelines (Annex II)	<b>Report</b>
35		<b>2009-06: 29</b>	Limit on purse seine vessels transshipment outside of port to vessels that have received an exemption from the Commission. Where applicable, flag CCM authorisation should be vessel-specific and address any specific conditions identified by the Commission.	<b>Limit</b>



36		2009-06: 34	Ban on high seas transshipment, unless a CCM has determined impracticability in accordance with para 37 guidelines, and has advised the Commission of such.	Limit
37		2009-06:35 (a) (ii)	Flag State's notification to the Secretariat on its flag vessels that are authorised to transship on the high seas	Report
38		2009-06: 35 (a) (iii)	WCPFC Transshipment Advance Notification (including fields in Annex III)	Report
39		2009-06: 35 (a) (iv)	WCPFC Transshipment Declaration (including information in Annex I)	Report
40	Charter Notification	2019-08: 02	Notification of charter arrangements made to the ED	Report
41		2019-08: 07	Report annually to ED the catch and effort of chartered vessels in the previous year (unless specifically provided in other CMMs)	Report
42	Sea turtles	2018-04: 06	CCMs to require longline vessels to carry and use line cutters and de-hookers to handle and promptly release sea turtles, as well as dip-nets where appropriate	Implementation
43		2018-04: 07 (a)	Sea Turtle mitigation requirements for shallow-set longline vessels	Implementation
44	Sharks	2019-04: 05	Report to describe, where applicable, any alternative measures from those in CMM 2019-04 SHARKS which are applied by CCMs in areas under national jurisdiction (provide in Part 2 Annual Report)	Report
45		2019-04: 07-10	Take measures necessary to require all sharks retained on board their vessels are fully utilized and ensure the prohibition of finning (provide in Part 2 Annual Report) <i>Includes consideration of para 10</i> Request from CCM for TCC and the Commission to consider endorsing alternative measures to fins naturally attached from those listed in para 9	Implementation
46		2019-04: 11	Report annually on shark fins attached/alternative measures	Report/Deadline
47		2019-04: 12	Take measures necessary to prevent fishing vessels from retaining on board (including for crew consumption), transshipping and landing any fins harvested in contravention of CMM 2019-04	Implementation
48		2019-04: 13	Shark carcasses/fins landed/transhipped together to ensure verification	Implementation
49		2019-04: 14-15	Implement at least one option to minimize bycatch of sharks in longline fisheries, and notify choice and whenever the selected option is changed	Implementation

50		2019-04: 16	Develop and report annually on management plans for longline fisheries targeting sharks in Pt 2 Annual Report	Implementation
51		2019-04: 18	Ensure that sharks that are caught but are not to be retained, are hauled alongside the vessel in order to facilitate species identification (only applicable where observer or EM camera is present, and where safe for crew and observers)	Implementation
52		2019-04: 20 (1)	Prohibit retaining/transshipping/storing/landing oceanic whitetip & silky sharks	Implementation
53		2019-04: 20 (2)	Requirement to release oceanic whitetip & silky sharks asap	Implementation
54		2019-04: 20 (3)	If oceanic whitetip & silky sharks caught, must be given to govt or discarded	Implementation
55		2019-04: 21 (1-7)	Prohibit purse seine setting on whale sharks, retaining/transshipping/landing of whale sharks	Implementation
56		2019-04: 21 (4)	CCMs implement compatible measures for whale sharks in zone N30N	Report
57		2019-04: 23	Report annually on implementation of shark CMM (Annex 2 template)	Report/Deadline
58	Cetaceans	2011-03: 01	Prohibit purse seine setting on cetaceans, if animal is sighted prior to commencement of the set	Implementation
59		2011-03: 02	Requirements in the event of unintentional encircling of cetaceans in the purse seine net, including incident reporting requirements	Implementation
60	Mobulids	2019-05: 04-06, 08, 10:	Mobulids: Prohibit retaining/transshipping/landing of mobulid rays	Implementation

## IV. DRAFT Audit Points

#	CMM/para	Category	IWG Feedback	DRAFT AUDIT POINT / <i>OUTCOME</i>
<b>Part B: Quantitative Limits in CMMs for Tuna and Billfish</b>				
1	SWP Str Marlin 2006-04 01	L	<ul style="list-style-type: none"> <li>Defer development of audit point until the Commission addresses the interpretation issues with the term “fished for”</li> <li>Secretariat should identify and confirm the limit for applicable CCMs (will be aided by addressing interpretation issue).</li> <li>Highlight in CMR where there are deficiencies in independent data available to verify compliance with Limit obligations and seek Commission guidance on ways to eliminate those deficiencies</li> <li>Requirement to submit evidence of a nationally binding instrument that reflects CCM limit goes beyond the scope of the CMS CMM for Limit obligations</li> </ul>	<p><i>Refer to Commission for resolution of interpretation of key terms to enable more accurate compliance assessment.</i></p> <p><i>Refer to Commission for consideration of acceptable data sources to independently verify self-reported limits.</i></p>
2	SWP Str Marlin 2006-04 04	R	<ul style="list-style-type: none"> <li>Defer development of audit point until the Commission addresses the interpretation issues with the term “fished for”</li> <li>Secretariat should identify and confirm the limit for applicable CCMs (will be aided by addressing interpretation issue).</li> <li>Clarify applicability to include CCM flagged vessels taking MLS as bycatch</li> </ul>	<p><i>Refer to Commission for resolution of interpretation of key terms to enable more accurate compliance assessment.</i></p>

#	CMM/para	Category	IWG Feedback	DRAFT AUDIT POINT / OUTCOME
3	Swordfish 2009-03 01	L	<ul style="list-style-type: none"> <li>Defer development of audit point until the Commission addresses the interpretation issues with the term “fished for”.</li> <li>Secretariat should identify and confirm the limit for applicable CCMs (will be aided by addressing interpretation issue).</li> <li>Include “Fished/Did Not Fish” reports as source of data to verify compliance</li> <li>Requirement to submit evidence of a nationally binding instrument that reflects CCM limit goes beyond the scope of the CMS CMM for Limit obligations</li> </ul>	<p><i>Refer to Commission for resolution of interpretation of key terms to enable more accurate compliance assessment.</i></p>
4	Swordfish 2009-03 02	L	<ul style="list-style-type: none"> <li>Requirement to submit evidence of a nationally binding instrument that reflects CCM limit goes beyond the scope of the CMS CMM for Limit obligations</li> <li>Highlight in CMR where there are deficiencies in independent data available to verify compliance with Limit obligations and seek Commission guidance on ways to eliminate those deficiencies</li> <li>CCM applicable limits needs to be confirmed by the Secretariat.</li> </ul>	<p>The CCM reported in AR Pt2 its total catch of SWO by its flagged vessels in the area south of 20S and the Secretariat can <b>verify</b> the CCM’s reported catch level and confirm that the CCM’s allowable limit has not been exceeded.</p> <p><i>Refer to Commission for consideration of acceptable data sources to independently verify self-reported limits.</i></p>
5	Swordfish 2009-03 03	I	<ul style="list-style-type: none"> <li>None</li> </ul>	<p>CCM submitted a <i>statement</i> in AR Pt2 that:</p> <ol style="list-style-type: none"> <li>confirms CCM’s implementation through adoption of a national binding measure that prohibits CCM flagged vessels from shifting fishing effort (for swordfish) to the area north of 20S</li> <li>describes how it is monitoring its flagged vessels to ensure they do not shift effort for SWO to the area north of 20S</li> </ol>

#	CMM/para	Category	IWG Feedback	DRAFT AUDIT POINT / OUTCOME
				and how the CCM responds to potential infringements or instances of non-compliance with this requirement.
6	Swordfish 2009-03 08	R	<ul style="list-style-type: none"> <li>Is template necessary if all required information is provided?</li> </ul>	The Secretariat confirms that the CCM submitted the required information contained in the template in Annex 2 of CMM in its AR Pt 1.
7	NP Str Marlin 2010-01 05	L	<ul style="list-style-type: none"> <li>Requirement to submit evidence of a nationally binding instrument that reflects CCM limit goes beyond the scope of the CMS CMM for Limit obligations</li> <li>Highlight in CMR where there are deficiencies in independent data available to verify compliance with Limit obligations and seek Commission guidance on ways to eliminate those deficiencies</li> <li>CCM applicable limits need to be confirmed by the Secretariat</li> </ul>	<p>The CCM reported its catch level in AR Pt2 and the Secretariat can <b>verify</b> the CCM’s reported catch limit and confirm that its allowable limit was not exceeded.</p> <p><i>Refer to Commission for consideration of acceptable data sources to independently verify self-reported limits.</i></p>
8	SP Albacore 2015-02 04	R	<ul style="list-style-type: none"> <li>Defer development of audit point until the Commission addresses interpretation issues with the term “actively fishing for”.</li> </ul>	<i>Refer to Commission for resolution of interpretation of terms to enable more accurate compliance assessment.</i>
9	Tropical Tuna 2021-01 24	L	<ul style="list-style-type: none"> <li>Requirement to submit evidence of a nationally binding instrument that reflects CCM limit goes beyond the scope of the CMS CMM for Limit obligations</li> </ul>	<ol style="list-style-type: none"> <li>Coastal CCM or PNA Office on behalf of PNA Parties+Tokelau notified their EEZ PS effort or catch limit or collective PNA+Tokelau EEZ effort or catch limit to the Secretariat by the required deadline.</li> <li>Coastal CCM confirms in AR Pt2 that its notified EEZ limit or its part of a notified collective EEZ limit has not been exceeded and the Secretariat can <b>verify</b> the CCM’s reported information and confirm that the notified EEZ or collective EEZ limit has not been exceeded.</li> </ol>

#	CMM/para	Category	IWG Feedback	DRAFT AUDIT POINT / OUTCOME
10	Tropical Tuna 2021-01 25	L	<ul style="list-style-type: none"> <li>Requirement to submit evidence of a nationally binding instrument that reflects CCM limit goes beyond the scope of the CMS CMM for Limit obligations</li> </ul>	CCM submitted its high seas PS effort level in the area between 20N and 20S in AR Pt 2 and the Secretariat can <b>verify</b> the CCM’s reported information and confirm that the allowable limit has not been exceeded.
11	Tropical Tuna 2021-01 Att 2 03	R	<ul style="list-style-type: none"> <li>Should the reporting deadline (“at least 24 hours prior to entry and no more than 6 hours prior to exiting HSP1-SMA”) be treated similarly to AR submission deadlines?</li> </ul>	<ol style="list-style-type: none"> <li>CCM submitted reports to the Secretariat at least 24 hours prior to entry and no more than 6 hours prior to exiting HSP1-SMA in the required format: <b>VID/Entry or Exit: Date/Time; Lat/Long</b></li> <li>Secretariat review of VMS alerts for CCM vessels operating in HSP1-SMA against received entry/exit reports does not show any discrepancies and Secretariat confirms CCM has no vessels with VTAF data gaps or other VMS reporting anomalies.</li> </ol>
12	Tropical Tuna 2021-01 37	L	<ul style="list-style-type: none"> <li>This is also an Implementation (I) obligation.</li> <li>Requirement to submit evidence of a nationally binding instrument that reflects CCM limit goes beyond the scope of the CMS CMM for Limit obligations.</li> <li>Highlight in CMR where there are deficiencies in independent data available to verify compliance with Limit obligations and seek Commission guidance on ways to eliminate those deficiencies.</li> </ul>	<p>The CCM reported its total bigeye catch in its AR Pt2 and the Secretariat can <b>verify</b> the CCM’s reported catch level and confirm that the allowable limit has not been exceeded.</p> <p><i>Refer to Commission for consideration of acceptable data sources to independently verify self-reported limits.</i></p>
13	Tropical Tuna 2021-01 38	R	<ul style="list-style-type: none"> <li>None</li> </ul>	The Secretariat confirms that it received 12 bigeye longline catch reports for each month of the reporting year.
14	Tropical Tuna 2021-01 40	L	<ul style="list-style-type: none"> <li>Requirement to submit evidence of a nationally binding instrument that reflects</li> </ul>	CCM reported its total bigeye catch in its AR Pt 2 and the Secretariat can <b>verify</b> the CCM’s reported catch level and confirm that it does not exceed 2,000mt.

#	CMM/para	Category	IWG Feedback	DRAFT AUDIT POINT / OUTCOME
			<p>CCM limit goes beyond the scope of the CMS CMM for Limit obligations.</p> <ul style="list-style-type: none"> <li>Is self-reported operational data sufficient for verification?</li> </ul>	<p><i>Refer to Commission for consideration of acceptable data sources to independently verify self-reported limits.</i></p>
15	Tropical Tuna 2021-01 42	L	<ul style="list-style-type: none"> <li>This is also an Implementation (I) obligation.</li> <li>Applicable baseline limits need to be confirmed by the Secretariat.</li> <li>Requirement to submit evidence of a nationally binding instrument that reflects CCM limit goes beyond the scope of the CMS CMM for Limit obligations.</li> </ul>	<p>The CCM reported its number of CCM flagged PS vessels &gt;24m with freezing capacity and operating between 20N and 20S and the Secretariat can <b>verify</b> the CCM's reported information and confirm that the allowable limit has not been exceeded.</p>
16	Tropical Tuna 2021-01 44	L	<ul style="list-style-type: none"> <li>Not applicable to EU</li> <li>Requirement to submit evidence of a nationally binding instrument that reflects CCM limit goes beyond the scope of the CMS CMM for Limit obligations.</li> <li>This is also an Implementation (I) obligation.</li> <li>CCM applicable limit needs to be confirmed by the Secretariat.</li> </ul>	<p>The CCM reported in AR Pt2 its number of flagged LL vessels with freezing capacity targeting bigeye and the Secretariat can <b>verify</b> the CCM's reported information and confirm that the allowable limit has not been exceeded.</p>
17	Tropical Tuna 2021-01 45	L	<ul style="list-style-type: none"> <li>CCM applicable limit needs to be confirmed by the Secretariat.</li> </ul>	<p>The CCM reported in AR Pt2 its number of flagged ice-chilled LL vessels targeting bigeye and landing exclusively fresh fish and the Secretariat can <b>verify</b> the CCM's reported information and confirm that the allowable limit has not been exceeded.</p>
18	Pacific Bluefin 2021-02 08 (2020-02 05)	R	<ul style="list-style-type: none"> <li></li> </ul>	<p>The Secretariat confirms CCM submitted a complete report to the Secretariat on total fishing effort and catch levels of PBT by fishery for the previous three years and catch information includes discards.</p>

#	CMM/para	Category	IWG Feedback	DRAFT AUDIT POINT / OUTCOME
19	Pacific Bluefin 2021-02 02 (2020-02 02(1))	L	<ul style="list-style-type: none"> <li>Clarify applicable CCMs with fishing vessels fishing for PBF in the Convention Area north of 20N to be assessed</li> <li>Include requirement for submission of nationally binding instrument</li> <li>Requirement to submit evidence of a nationally binding instrument that reflects CCM limit goes beyond the scope of the CMS CMM for Limit obligations.</li> </ul>	CCM reported its total level of fishing effort by CCM's flagged vessels fishing for PBF north of 20N in its report to the Secretariat as required by paragraph 8 of the CMM, and the Secretariat can <b>verify</b> the CCM's reported total fishing effort and confirm that the CCM's allowable limit was not exceeded.
20	Pacific Bluefin 2021-02 03 (2020-02 02(2))	L	<ul style="list-style-type: none"> <li></li> </ul>	CCM reported its total catches of PBF less than 30kg and 30kg or larger and the Secretariat can <b>verify</b> the CCM's reported total catches and confirm that the total catch level does not exceed the CCM's allowable annual limit.
21	Pacific Bluefin 2021-02 04	L	<ul style="list-style-type: none"> <li>CCM applicable limit needs to be confirmed by the Secretariat</li> </ul>	CCM reported its total catches of PBF 30kg or larger and the Secretariat can <b>verify</b> the CCM's reported total catches and confirm that the CCM's catch of PBF 30kg or larger has not increased by more than 15% above its allowable limit, or that the CCM's catch of PBF 30kg or larger has not exceeded 10mt beyond the CCM's applicable baseline catch limit.
22	Pacific Bluefin 2021-02 14	R	<ul style="list-style-type: none"> <li></li> </ul>	The Secretariat confirms receipt of a complete report by the CCM on national binding measures adopted to implement paragraphs 2, 3, 4, 7, 8, 10, 11, 13, and 16 of the CMM, and that the report includes results of the CCM's monitoring of international trade of products derived from PBF.
<b>Part C: Additional Measures for Tropical Tunas</b>				
23	Tropical Tuna	I	<ul style="list-style-type: none"> <li>Should also be assessed as a Limit (L) obligation</li> </ul>	CCM submitted a <i>statement</i> in AR Pt2 that:



#	CMM/para	Category	IWG Feedback	DRAFT AUDIT POINT / <i>OUTCOME</i>
	2021-01 14			<p>a. confirms CCM’s implementation through adoption of a national binding measure that prohibits CCM flagged PS vessels from fishing on FADs between 1 July and 30 September in EEZs and high seas between 20N and 20S.</p> <p>b. describes how CCM is monitoring its flagged PS vessels to ensure they do not fish on FADs in EEZs and on high seas between 20N and 20S and how potential infringements or instances of non-compliance with this requirement are handled.</p> <p><i>*FOR PNA MEMBERS THAT NOTIFY EXEMPTIONS AS PER FOOTNOTE 1: In addition to the statement required in #1 for its flagged vessels operating in other EEZs and on the high seas between 20N and 20S, the PNA member submitted a notification to the WCPFC ED within 15 days of its approval of an arrangement to which domestic vessels that the 3-month FAD closure will not apply in PNA member EEZ.</i></p>
24	Tropical Tuna 2021-01 15	I	•	<p>Based on the CCM’s notification by the required deadline of its choice of implementation of which two consecutive additional months of FAD closure on the high seas, the CCM has submitted a statement that:</p> <p>a. confirms CCM’s implementation through adoption of a national binding measure that prohibits CCM flagged PS vessels from fishing on FADs on the high seas between 20N and 20S during the chosen additional two months closure period</p> <p>b. describes how CCM is monitoring its flagged PS vessels to ensure they do not fish on FADs on the high seas between 20N and 20S during the chosen additional two months closure period, and how potential infringements or</p>

#	CMM/para	Category	IWG Feedback	DRAFT AUDIT POINT / <i>OUTCOME</i>
				instances of non-compliance with this requirement are handled.
Part E: Mitigating Impacts of Fishing, Including on Species of Special Interest				
25	Cetaceans 2011-03 01	I	<ul style="list-style-type: none"> <li>Should also be assessed as a Limit (L) obligation</li> </ul>	<p>CCM submitted a <i>statement</i> in AR Pt2 that:</p> <ol style="list-style-type: none"> <li>confirms CCM’s implementation through adoption of a national binding measure that prohibits CCM flagged PS vessels from setting a purse seine net on a school of tuna associated with a cetacean (if sighted prior to commencement of the set)</li> <li>describes how CCM is monitoring its flagged PS vessels to ensure they do not set a purse seine net on a school of tuna associated with a cetacean where a sighting occurs prior to commencement of the set, and how potential infringements or instances of non-compliance with this requirement are handled.</li> </ol>
26	Cetaceans 2011-03 02	I	<ul style="list-style-type: none"> <li></li> </ul>	<p>CCM submitted a <i>statement</i> in AR Pt2 that:</p> <ol style="list-style-type: none"> <li>confirms CCM’s implementation through adoption of a national binding measure that requires the vessel master of CCM flagged PS vessels to follow safe release guidelines in the event a cetacean is unintentionally encircled in the PS net</li> <li>describes how CCM is monitoring the vessel masters of CCM’s flagged PS vessels to ensure safe release guidelines are followed and how potential infringements or instances of non-compliance with this requirement are handled.</li> </ol>
27	Sea Turtles 2018-04 06	I	<ul style="list-style-type: none"> <li></li> </ul>	<p>CCM submitted a <i>statement</i> in AR Pt2 that:</p> <ol style="list-style-type: none"> <li>confirms CCM’s implementation through adoption of a national binding measure that requires operators of CCM flagged LL</li> </ol>

#	CMM/para	Category	IWG Feedback	DRAFT AUDIT POINT / <i>OUTCOME</i>
				<p>vessels to carry and use line cutters and de-hookers to handle and promptly release sea turtles caught or entangled and where appropriate, carry and use dip-nets in accordance with WCPFC guidelines</p> <p>b. describes how CCM is monitoring the operators of CCM’s flagged LL vessels to ensure this requirement is followed and how potential infringements or instances of non-compliance with this requirement are handled.</p>
28	Sea Turtles 2018-04 07a	I	<ul style="list-style-type: none"> <li>Support WCPFC Secretariat approach</li> </ul>	<p>CCM submitted a <i>statement</i> in AR Pt2 that:</p> <p>a. confirms CCM’s implementation through adoption of a national binding measure that requires operators of CCM flagged LL vessels to employ at least one of the three mitigation methods listed in paragraph 7a of the CMM</p> <p>b. describes how CCM is monitoring the operators of CCM’s flagged LL vessels to ensure that at least one of the mitigation measures in paragraph 7a of the CMM is being employed, and how potential infringements or instances of non-compliance with this requirement are handled.</p> <p>and the Secretariat confirms that CCM provided information in AR Pt 2 of any CCM vessel interactions with sea turtles in fisheries managed under the Convention and confirmation that CCM vessels are required to record all incidents involving sea turtles during fishing operations.</p>
29	Sharks 2019-04 05	R	<ul style="list-style-type: none"> <li><i>This obligation was inadvertently omitted from the May 2022 CMS IWG Draft Audit Points</i></li> </ul>	<p>The Secretariat confirms that CCM reported in AR Pt 2 information on alternative measures not contained in the CMM that the CCM is applying in areas under CCM’s national jurisdiction.</p>
30	Sharks 2019-04 23	R	<ul style="list-style-type: none"> <li></li> </ul>	<p>The Secretariat confirms CCM submitted a report in AR Pt2 that addresses each of the elements contained in the template at Annex 2 of the CMM.</p>

#	CMM/para	Category	IWG Feedback	DRAFT AUDIT POINT / <i>OUTCOME</i>
31	Sharks 2019-04 07-10	I	•	CCM submitted a <i>statement</i> in AR Pt2 that: <ol style="list-style-type: none"> <li>a. confirms CCM’s implementation through adoption of a national binding measure that requires CCM flagged vessels to fully utilize any sharks that are retained on board and to prohibit any finning from taking place, or required alternative measures to ensure individual shark carcasses and their corresponding fins can be easily identified on board the vessel at any time</li> <li>b. describes how CCM is monitoring its flagged vessels to ensure that sharks are being fully utilized and fins are naturally attached to the carcass or alternative measures are applied as per the CMM, and how potential infringements or instances of non-compliance with this requirement are handled.</li> </ol>
32	Sharks 2019-04 11	R	•	The Secretariat confirms receipt of a report from CCM in AR Pt 2 with information on CCM implementation of measures taken to require CCM vessels to land sharks with fins naturally attached to the carcass, including a detailed explanation of implementation of paragraphs 8 and 9 of CMM 2019-04 and CCM’s compliance monitoring activities.
33	Sharks 2019-04 12	I	•	CCM submitted a <i>statement</i> in AR Pt2 that: <ol style="list-style-type: none"> <li>a. confirms CCM’s implementation through adoption of a national binding measure that prohibits CCM flagged fishing vessels from retaining on board, transshipping, landing, or trading any fins harvested in contravention of CMM 2019-04</li> <li>b. describes how CCM is monitoring its flagged fishing vessels to ensure that no fins are retained on board, transshipped, landed or traded, and how potential infringements or instances of non-compliance with this requirement are handled.</li> </ol>
34	Sharks 2019-04 13	I	•	CCM submitted a <i>statement</i> in AR Pt2 that:

#	CMM/para	Category	IWG Feedback	DRAFT AUDIT POINT / OUTCOME
				<ul style="list-style-type: none"> <li>a. confirms CCM’s implementation through adoption of a national binding measure that requires CCM flagged fishing vessels to land or tranship all shark carcasses with their corresponding fins and in a manner that enables inspectors to verify</li> <li>b. describes how CCM is monitoring its flagged fishing vessels to ensure that all shark fins that are landed or transhipped with their corresponding carcasses can be verified, and how potential infringements or instances of non-compliance with this requirement are handled.</li> </ul>
35	Sharks 2019-04 14-15	I/R	•	<p>Based on the CCM’s notification to the Secretariat of which option will apply to the CCM or its individual vessels, the CCM has submitted a statement in AR Pt 2 that:</p> <ul style="list-style-type: none"> <li>a. confirms CCM’s implementation through adoption of a national binding measure that requires its flagged LL vessel or vessels to apply the CCM’s selected option</li> <li>b. describes how CCM is monitoring its flagged LL vessels to ensure that the selection option is being applied and how potential infringements or instances of non-compliance with this requirement are handled.</li> </ul>
36	Sharks 2019-04 16	R	•	The Secretariat confirms CCM submitted a report in its AR Pt 2 of its management plan for CCM’s flagged LL vessels targeting sharks (note report guidance in CMM Annex 2 para 5).
37	Sharks 2019-04 18	I	•	<p>CCM submitted a <i>statement</i> in AR Pt2 that:</p> <ul style="list-style-type: none"> <li>a. confirms CCM’s implementation through adoption of a national binding measure that requires CCM flagged vessels with observers or electronic monitoring cameras on board to haul any sharks that are caught alongside the vessel before being cut free to facilitate species ID</li> </ul>

#	CMM/para	Category	IWG Feedback	DRAFT AUDIT POINT / <i>OUTCOME</i>
				<ul style="list-style-type: none"> <li>b. describes how CCM is monitoring its flagged vessels with observers or electronic monitoring cameras on board to ensure that any sharks caught are hauled alongside to facilitate species ID, and how potential infringements or instances of non-compliance with this requirement are handled.</li> </ul>
38 39 40	Sharks (OWT, SS) 2019-04 20 (01-03)	I	•	<p>CCM submitted a <i>statement</i> in AR Pt2 that:</p> <ul style="list-style-type: none"> <li>a. confirms CCM’s implementation through adoption of a national binding measure that prohibits CCM flagged vessels or vessels under CCM charter to retain on board, tranship, store, or land any oceanic whitetip or silky shark, in whole or in part; requires release of any oceanic whitetip or silky shark that is caught, in accordance with applicable safe release guidelines; surrender in whole any unintentionally caught oceanic whitetip or silky shark that are frozen as part of CCM flagged PS vessels’ operation to the responsible government authorities or discard them at the point of landing or transhipment, upon which any surrendered OWT or SS may be donated for human consumption</li> <li>b. describes how CCM is monitoring its flagged vessels or vessels it charters to ensure the requirements are met, and how potential infringements or instances of non-compliance with this requirement are handled.</li> </ul>
41 42	Sharks (Whale) 2019-04 21 (01-07) 2019-04 21(04)	I/R	•	<p>CCM submitted a <i>statement</i> in AR Pt2 that:</p> <ul style="list-style-type: none"> <li>a. confirms CCM’s implementation through adoption of a national binding measure that: prohibits its flagged and chartered vessels from setting a purse seine on a school of tuna associated with a whale shark if the animal is sighted prior to the commencement of a set, or retaining on board, transhipping, or landing any whale shark caught in the Convention Area, in whole or in part, in the fisheries covered by the Convention; ensures that all reasonable steps are taken to</li> </ul>

#	CMM/para	Category	IWG Feedback	DRAFT AUDIT POINT / <i>OUTCOME</i>
				<p>ensure safe release of incidentally encircled whale sharks and that the incident is reported to the CCM's relevant authority</p> <p>b. describes how the CCM is monitoring its flagged and chartered vessels to ensure the requirements are met and how potential infringements or instances of non-compliance with this requirement are handled.</p> <p>*CCMs with vessels authorized to fish in the EEZ of any member of the PNA shall include in their statement in AR Pt 2 the requirement for this prohibition to be in accordance with the PNA 3IA. (para 21.3)</p> <p>*CCMs with vessels authorized to fish in EEZs of CCMs north of 30N, the CCM shall implement the CMM or compatible measures consistent with obligations in the CMM and provide a description of those measures in AR Pt 2. (para 21.4)</p>
43	<p><b>Mobulids</b> 2019-05 04-06, 08, 10</p>	I	<ul style="list-style-type: none"> <li>Should also be assessed as a Limit (L) obligation</li> </ul>	<p>CCM submitted a <i>statement</i> in AR Pt 2 that:</p> <p>a. confirms CCM's implementation through adoption of a national binding measure that: prohibits its flagged vessels from retaining on board, transshipping, or landing any part or whole carcass of a mobulid ray, and require prompt release alive and unharmed any mobulid ray that is caught, in accordance with safe handling practices in the CMM; requires CCM PS vessel operators to surrender any unintentionally caught and landed mobulid rays to the relevant government authorities at the point of landing or transshipment, or discard them where possible, and allows observers to collect biological samples of mobulid rays that are caught and dead at haul back</p> <p>b. describes how the CCM is monitoring its flagged vessels to ensure the requirements are met and how potential infringements or instances of non-compliance with this requirement are handled.</p>

#	CMM/para	Category	IWG Feedback	DRAFT AUDIT POINT / OUTCOME
Part F: Operational Requirements for Fishing Vessels				
44	VMS 2014-02 09a	I	<ul style="list-style-type: none"> <li>The Secretariat should not rely on “the average days per year of vessels that ‘fished’ by gear type, that are identified as having potential VMS reporting anomalies” to confirm implementation because this would be time consuming to resolve given that most vessels do not operate throughout the whole year. Suggest that it is sufficient for Secretariat to confirm VTAF details are complete and whether MTU/ALC activation is successful.</li> </ul>	<p>CCM submitted a <i>statement</i> in AR Pt 2 that:</p> <ol style="list-style-type: none"> <li>confirms CCM’s implementation through adoption of a national binding measure that requires operators of its flagged vessels to comply with the Commission standards for WCPFC VMS including being fitted with ALCs/MTUs that meet Commission requirements</li> <li>describes how the CCM is monitoring its flagged vessels to ensure the requirements are met and how potential infringements or instances of non-compliance with this requirement are handled.</li> </ol>
45	VMS SSPs 2.8	R	<ul style="list-style-type: none"> <li></li> </ul>	<ol style="list-style-type: none"> <li>The Secretariat confirms that CCM’s flagged vessels are on the FFA Good Standing List</li> </ol> <p>or</p> <ol style="list-style-type: none"> <li>The Secretariat confirms that the CCM has provided complete VTAF details and activation of the MTU/ALC is successful.</li> </ol>
46	RFV 2018-06 09	R	<ul style="list-style-type: none"> <li></li> </ul>	<p>The Secretariat confirms that a fished/did not fish report has been received from the CCM using the required template.</p>
47	RFV 2018-06 03	I	<ul style="list-style-type: none"> <li></li> </ul>	<p>CCM submitted a <i>statement</i> in AR Pt 2 that:</p> <ol style="list-style-type: none"> <li>confirms CCM’s implementation through adoption of a national binding measure that prohibits fishing by CCM flagged vessels beyond areas of CCM’s national jurisdiction without the appropriate CCM authorization</li> <li>describes how the CCM is monitoring and ensuring that its flagged vessels are not operating beyond the CCM’s areas of national jurisdiction without the appropriate CCM</li> </ol>



#	CMM/para	Category	IWG Feedback	DRAFT AUDIT POINT / <i>OUTCOME</i>	
				authorization, and how potential infringements or instances of non-compliance with this requirement are handled	
<b>Part G: Activity Related Requirements</b>					
48	SciData 01 (annual catch estimates)	R	<ul style="list-style-type: none"> <li>Tier II scoring may require clarification</li> </ul>	Assessment is in accordance with Tier-Scoring Evaluation Level:	
49	SciData 02 (number of active vessels)			<ul style="list-style-type: none"> <li>A Tier Score of III = COMPLIANT</li> <li>A Tier Score of I or II = NON-COMPLIANT/PRIORITY</li> </ul>	
50	SciData 03 (operational level C/E data)			I	No data are provided, or data have been provided but they have been evaluated as ‘unusable’ (instances where none of the data provided can be used in assessments). This level of data gap is the most severe and has by far the greatest impacts on the scientific work of the Commission.
51	SciData 05 (size composition data)			II	Data have been provided, most of which can be used for the scientific work of the Commission, but (i) there are one or several (minimum-standard) data fields not provided an/or (ii) the coverage of the data is not according to the requirements. In these cases, some of the scientific work of the Commission cannot be undertaken. The % value assigned in this category represents the estimated proportion of the key attribute data provided compared to the full set of key attribute data required as stipulated in the WCPFC data submission guidelines.

#	CMM/para	Category	IWG Feedback	DRAFT AUDIT POINT / <i>OUTCOME</i>
				III Data have been provided, there are no gaps in the data provided and the coverage of data is according to the requirements.
52	Charters 2019-08 07	R	•	The Secretariat confirms that it received a report from the chartering CCM on the catch and effort of vessels notified as operating under charter to the CCM.
53	Charters 2019-08 02	R	•	The Secretariat confirms that notification from a CCM of which vessels are to be identified as operating pursuant to a chartering arrangement with the CCM was received within the required timeframe.
54	Transshipment 2009-06 29	L	•	The Secretariat <b>verifies</b> the information reported by the CCM in AR Pt 2 and confirms that the CCM's allowable limit of PS vessels transshipping outside of port has not been exceeded.  *Note additional reporting obligations for COVID19-related requirements:  The Secretariat has received information in AR Pt 2 of the CCM's approach to implementation of the suspension from 20 April to 31 December 2021.
55	Transshipment 2009-06 11	R	•	The Secretariat confirms receipt by the CCM in AR Pt 1 of the required information in the prescribed format contained at Annex II of CMM 2009-06, and confirms that the report includes the required information for all CCM transshipment events in the Convention Area of all HMFS covered by the Convention, as well as HMFS taken in the Convention Area and transhipped outside the Convention Area, in accordance with paras 10, 11, and 12 of CMM 2009-06.

#	CMM/para	Category	IWG Feedback	DRAFT AUDIT POINT / <i>OUTCOME</i>
56	Transshipment 2009-06 34	L	<ul style="list-style-type: none"> <li>• Include requirement for submission of nationally binding instrument</li> <li>• Requirement to submit evidence of a nationally binding instrument that reflects CCM limit goes beyond the scope of the CMS CMM for Limit obligations.</li> <li>• How to objectively and factually define “impracticability”?</li> </ul>	The Secretariat verifies information submitted by the CCM on its approved level of high seas transshipment and confirms that the CCM has not exceeded its allowable limit.
57	Transshipment 2009-06 35(a)(ii)	R	<ul style="list-style-type: none"> <li>•</li> </ul>	The Secretariat confirms that CCM provided required notification of its authorization for CCM flagged vessels to tranship on the high seas and CCM’s RFV data corresponds with its notified number of authorizations and Secretariat records of high seas transshipment activities.
58	Transshipment 2009-06 35(a)(iii)	R	<ul style="list-style-type: none"> <li>• Should include statements of implementation/monitoring/responses</li> </ul>	Where a CCM (or chartering CCM) has indicated that it has authorized its flagged vessels to engage in high seas transshipment and indicated such authorization in its RFV, the Secretariat confirms that it has received the corresponding WCPFC high seas transshipment <b>notification</b> in respect of each CCM-authorized vessel in accordance with Annex III of CMM 2009-06 or WCPFC ER Standards for high seas transshipment.
59	Transshipment 2009-06 35(a)(iv)	R	<ul style="list-style-type: none"> <li>• Should include statements of implementation/monitoring/responses</li> </ul>	Where a CCM (or chartering CCM) has indicated that it has authorized its flagged vessels to engage in high seas transshipment and indicated such authorization in its RFV, the Secretariat confirms that it has received the corresponding WCPFC high seas transshipment <b>declaration</b> in respect of each CCM-authorized vessel in accordance with Annex I of CMM 2009-06 or WCPFC ER Standards for high seas transshipment.

#	CMM/para	Category	IWG Feedback	DRAFT AUDIT POINT / <i>OUTCOME</i>
Part I: Observer Activity Related Requirements				
60	Tropical Tuna 2021-01 Att2 05-06	I	•	CCM submitted a <i>statement</i> in AR Pt 2 that: <ol style="list-style-type: none"> <li>a. confirms CCM’s implementation through adoption of a national binding measure that requires CCM flagged vessels to employ a WCPFC Regional Observer while operating in HSP-1 SMA</li> <li>b. describes how the CCM is monitoring and ensuring that its flagged vessels are not operating in HSP-1 SMA without a WCPFC Regional Observer, and how potential infringements or instances of non-compliance with this requirement are handled</li> </ol>

-END-