

Compliance Action Plan (for 2025 to 2029 inclusive)

A. Compliance Action Plan

Risk 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)	2025	2026	2027	2028	2029
1. Non-compliance with the (e)CDS or incorrect information in (e)CDS documents.	L/M	a) To continue to move towards implementation of the eCDS as soon as possible.	Members and the Secretariat	*	*			
		b) Expedite (e)CDS capacity building for Members and Member stakeholders. ¹	Members and the Secretariat	*	*	*		
		c) Routinely check and correct (e)CDS errors.	Members and the Secretariat	Ongoing				
		d) Routinely assess market statistics to identify any widespread non-compliance.	Members and the Secretariat	Ongoing				
2. Incomplete implementation or submission of (e)CDS data including Non-Members not cooperating with the CDS Resolution.	M	a) Extend the availability of the (e)CDS to some key identified Non-Members.	Members and the Secretariat		*	*	*	
		b) Continue (e)CDS capacity building by the Secretariat. ¹	Members and the Secretariat			*	*	*
		c) 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.	Secretariat	Ongoing				
		d) Report on Members' implementation of the (e)CDS to CCSBT annually.	Secretariat	Ongoing				
3. Incomplete reporting of SBT mortalities.	H	a) Ensure Members meet reporting requirements as they relate to describing how they monitor, estimate and report all SBT mortalities	Members, Secretariat and ESC	*	*			
		b) Consider strengthening corrective actions policies.	Members	*	*			
		c) 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) Ensure Members meet reporting requirements as they relate to describing how they monitor, estimate and report all SBT mortalities	Members Secretariat and CC	*	*			
		b) Further effort by each member to improve and strengthen its estimate of the actual catch amount for each element outlined at paragraph 4 (b) of the limited carry-forward resolution.	Members				*	*
		c) Reconcile market and catch data.	Members and Secretariat	Ongoing				
5. Non-compliance associated with transshipment obligations (both in port and at-sea).	M	a) Review if arrangements have been implemented to ensure transshipment obligations are in place and report back to the Compliance Committee (CC).	Members		*	*		
		b) Review what actions can be taken in the case of non-compliance of Members or NCNM Carrier Vessels and report back to the CC.	Members and the Secretariat		*	*		
		c) Report annually on Members' implementation of and compliance with CCSBT's Transshipment Resolution.	Secretariat	Ongoing				

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

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6. Incomplete submission of transshipment information including transshipment information for non-Member flagged vessels.	L/M	a) Strengthen CCSBT's Transshipment Resolution including considering the introduction of supply declarations in 2025.	Members	*			*	
		b) Improve and enhance the existing information sharing arrangements between CCSBT and other RFMOs with respect to transshipment information.	Members and Secretariat	*	*			
		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 and report back to the CC.	Members and Secretariat				*	
		e) Support other RFMO transshipment programs to train observers with regard to CCSBT obligations.	Secretariat	Ongoing				
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 and report progress to the CCSBT annually.	Members and Secretariat	Ongoing				
		b) Consider the costs and benefits of genetic testing in markets and whether to conduct such testing and report back to the CC.	Members and Secretariat	*	*			
		c) Consider the feasibility of transshipment observers taking tissue samples as part of the IOTC/ICCAT transshipment observer programmes and report back to the CC.	Secretariat			*		
		d) Share any available information/intelligence that will assist with the identification of SBT reported as other species.	Members	Ongoing				
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 encourage IOTC to report SBT catch.	Members			*		
		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) 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.	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 and Secretariat			*	*	
		c) Support Members who are considering using EM as a source of scientific data observations where it may be difficult to employ human observers.	Members and Secretariat	Ongoing				

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10. Incomplete or inaccurate reporting of non SBT bycatches, including seabirds.	H	a) Review procedures and methods to improve compliance by SBT fishing operators with seabird CMMs and reporting requirements concerning seabird interactions.	CC, Members and Secretariat	*					
		b) Review data collection forms and procedures across tuna RFMOs regarding compliance with seabird CMMs by longline fishing operators and develop harmonised format to communicate and advocate across tuna RFMOs.	CC, Members and Secretariat	*					
		c) Provide an annual summary of any non-compliance detected with respect to the collection and provision of non-SBT bycatch information.	Members and Secretariat	Ongoing					
11. CCSBT Members not fully implementing specific Conservation and Management Measures (CMM's) as agreed, particularly the CCSBT ERS Measure.	L	a) Consider additional domestic monitoring and surveillance measures for further ensuring full implementation of the CCSBT ERS Measure.	Members	Ongoing					
		b) 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.	Members and Secretariat	Ongoing					
12. CCSBT Members not fully complying with the obligations of specific Conservation and Management Measures (CMM's) as agreed, particularly the CCSBT ERS Measure.	H	a) Capacity building for vessel crew of developing state on binding ERS measures.	Members		*	*			
		b) Support developing State CCSBT Members to raise awareness of CCSBT obligations within their industry and to identify and introduce tools to support improved compliance with CCSBT measures.	Members and Secretariat	*	*				
		c) Consider additional domestic measures for further ensuring full compliance with the CCSBT ERS Measure.	Members	Ongoing					
		d) 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.	Members and Secretariat	Ongoing					
13. Lack of systematic follow-up actions to address non-compliance leading to persistent non-compliance.	M	a) Consider opportunities to better support CC to discuss and recommend effective follow up action to address identified non-compliance, including through the review and update of CPG3 and through reporting from the Secretariat.	Members and Secretariat	*	*				
		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.	Members and Secretariat	Ongoing					
14. The increasing demands of work limiting the ability of the Secretariat to assess compliance.	M/H	a) Review current and future (expected) workload of the Secretariat taking into account the priorities and the current human and financial resources and report back to compliance committee report back to compliance committee.	Members and Secretariat	*					

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		b) 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.	Members and Secretariat	Ongoing				
15. Lack of comprehensive monitoring and inspection of vessels on the High Seas.	L/M	a) Encourage Members to support and advocate for the adoption of boarding and inspection CMM in IOTC.	Members	*	*			
		b) Explore the feasibility of establishing CCSBT's own boarding and inspection programme.	Members, Secretariat and CC			*	*	*
		c) 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.	Members			*		
General		a) 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.	Members and Secretariat	Ongoing				
		b) Review Compliance Plans, policies and CMMs regularly as required including adding updates, enhancements, and checking they are fit for purpose and not duplicative.	Members and Secretariat	Ongoing				