



CCSBT–CC/2510/08

Update of the CCSBT Compliance Plan (CC Agenda item 3.1)

1. Introduction

The 19th meeting of the Compliance Committee (CC19) agreed that the Compliance Committee would review the CCSBT Compliance Plan in 2025 (at CC20) to ensure that its overarching goals, strategies and principles are aligned with CCSBT's 2023-2028 Strategic Plan.

The CCSBT Strategic Plan includes a Convention Objective along with Vision and Goals that inform the work of the Commission, including its compliance activities and priorities. The CCSBT Compliance Plan defines the CCSBT compliance approach and establishes a framework that supports the continual improvement in compliance with obligations.

A key supporting document of the Compliance Plan is the Compliance Action Plan 2025-2029 (CAP). The CAP sits within the CCSBT Compliance Plan and identifies priority compliance risks and agreed compliance actions to address these risks. The CCSBT Compliance Plan, therefore, needs to not only define the CCSBT compliance approach, but also outline the processes needed to:

- ensure that the compliance risks remain up to date and emerging risks are identified and discussed by the Compliance Committee;
- review action taken to address these risks and ensure that defined actions are effectively responding to these risks; and
- ensure that CCSBT maintains a responsive and targeted compliance approach.

This paper provides:

- The current Compliance Plan revised at the Twenty-Sixth Annual Meeting of the Commission and Extended Commission (CCSBT26) (17 October 2019) (**Attachment A**);
- A draft discussion document that includes the current Compliance Plan text, draft recommended updates for new Compliance Plan and comments from the Secretariat on the updates (**Attachment B**); and
- A clean copy of the draft CCSBT Compliance Plan (**Attachment C**).

2. Background

CCSBT's updated Strategic Plan for 2023 to 2028 included 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”*.

Work to update the CAP commenced in 2023. The CAP for 2025-2029 was completed at CC19 and endorsed at CCSBT31 in 2024. The Compliance Action Plan (CAP) sits within the Compliance Plan and current CCSBT Compliance Plan was last updated in 2019. It is therefore essential that the CCSBT Compliance Plan is reviewed and updated to ensure that it

provides a framework that best supports the implementation of the CAP, including ensuring that it is effectively monitored and responsive to new and emerging risks.

The Secretariat has reviewed the CCSBT Compliance Plan and provided recommended updates to the Plan for the consideration of the Compliance Committee to meet these needs.

The purpose of the CCSBT Compliance Plan remains to provide a framework for the Commission and Members to improve compliance, and over time, achieve and maintain full compliance with their CCSBT obligations.

The Draft Updated CCSBT Compliance Plan

A draft discussion document has been provided as Attachment B to this paper and includes the current CCSBT Compliance Plan text, draft recommended updates for a new CCSBT Compliance Plan. The Secretariat has also provided comments on the recommended updates for Members consideration. The key changes to the draft CCSBT Compliance Plan are:

- The alignment with mechanisms established to support improved compliance, including the [Corrective Actions Policy](#) and the [Capacity Building Workplan](#).
- The removal of strategies to streamline the plan and focus on key areas of delivery, recognising the move to a more risk-based approach to compliance by CCSBT.
- Updating the compliance principles that inform the key elements of the CCSBT compliance approach.
- Outlining a review process that is based around the Compliance Committee conducting:
 - Annual reviews of the compliance risks to identify and discuss current and emerging risks to ensure that the Commission is responding to current priority compliance risks. This will also minimise the burden on the Compliance Committee to undertake a full review process to update compliance risks every five years as was previously conducted.
 - An annual review of progress made against actions identified in the Compliance Action Plan and an assessment of whether the target delivery timeframes remain applicable.
 - An annual review of actions identified in the Compliance Action Plan for delivery in the following year and an assessment of whether the target delivery timeframes remain applicable.
 - Identification of any new actions needed to address any agreed new or emerging risks.

Summary

The Secretariat invites Members to:

- Consider and discuss the draft CCSBT Compliance Plan provided by the Secretariat;
- Agree and update the draft CCSBT Compliance Plan as needed; and
- Recommend that CCSBT 32 adopt the updated CCSBT Compliance Plan.

Prepared by the Secretariat

CCSBT Compliance Plan

(Revised at the Twenty-Sixth Annual Meeting: 17 October 2019)

Purpose

The Compliance Plan supports the CCSBT Strategic Plan, approved in October 2015. Specifically, it supports the vision for Category C:

“Members are actively participating in management of SBT through the Commission and implementing its decisions”.

The purpose of the Compliance Plan is to provide a framework for the Commission and Members to improve compliance, and over time, achieve full compliance with their CCSBT conservation and management measures.

The Compliance Plan includes a Five-Year Action Plan to address priority compliance risks. The action plan will be reviewed and confirmed or updated at least every five years. The action plan is therefore a ‘rolling’ document and over time its emphasis will change.

Throughout this document references to Members include Cooperating Non-Members of the Extended Commission (CNMs), and all references to the Commission include the Extended Commission (EC).

Structure

This plan is in five parts:

1. Goals and Strategies
2. Compliance Principles
3. Roles and Responsibilities
4. Plan implementation and review
5. Five -Year Action Plan (Appendix 1).

Part 1: Goals and Strategies

Goals

The CCSBT Strategic Plan identifies four goals concerning participation and implementation by Members (Category C):

- ***Monitoring, control, and surveillance (Goal 8)***
Integrated, targeted and cost-effective monitoring, control and surveillance measures are in place to ensure the Commission's goals are met.
- ***Members' obligations (Goal 9)***
All Members comply with rules of CCSBT.
- ***Supporting developing countries (Goal 10)***
Developing country Members are able to comply with the Commission's management measures and other requirements.
- ***Participation in the CCSBT (Goal 11)***
Ensure that all States and Regional Economic Integration Organisations (REIOs) and entities catching SBT are incorporated in the Commission and engaged in the cooperative management of SBT. Encourage the cooperation of port and market States with CCSBT's objectives and management arrangements

Strategies

Strategies are the suggested approach to achieve the goals and are numbered according to their corresponding goal.

The strategies below are based on the strategies set out in the CCSBT Strategic Plan (pages 15-16). In some cases the titles have been modified, and the descriptions elaborated. Strategy 8.4 has been expanded to explicitly cover monitoring of IUU fishing by non-members.

8.1 Implementation by Members of agreed MCS measures

The Compliance Committee will monitor Members' implementation of CCSBT conservation and management measures. This will include maintaining a comprehensive list of conservation and management measures, and Members regularly reporting against their obligations under these measures. Members' reports will be analysed by the Compliance Committee, and Members will be questioned and provided with feedback on their reports. Independent audits will also be conducted (refer to strategy 9.1).

The Compliance Committee will continue to develop¹ and regularly review existing compliance policies so that these clearly specify Members' obligations and associated performance requirements, e.g. the document, "Minimum Performance Requirements to Meet CCSBT Obligations". Compliance policies will be adopted following agreement by the Commission.

¹ Compliance policy guidelines have been developed for minimum performance requirements (CPG1), corrective actions (CPG3), and information collection and sharing (CPG4).

8.2 Implement Compliance Plan

New measures may be needed to address emerging compliance risks or replace ineffective or inefficient measures. The Compliance Committee will adopt a risk-management approach when developing measures and obligations to recommend to the Commission. This includes:

- a) assessing the necessity of additional MCS measures and/or improvement of agreed MCS measures to meet Commission objectives; and
- b) identifying any gaps between MCS measures in place and any improvements or additional measures required and a process to implement these.

Recommendations for changes or additions to conservation and management measures will also include performance requirements.

8.3 Strengthen Members' compliance

Continue to strengthen efforts by Members to ensure sufficient compliance at each stage of SBT fisheries, from catch grounds to markets, including transshipment, farming and trade.

The Compliance Committee will continue to develop policies and guidelines to assist Members to plan and implement effective MCS systems and the cost-efficient delivery of compliance services. These policies and guidelines will be based on Members' obligations and be focussed on how best to avoid, remedy or mitigate the risks of not meeting obligations.

As part of this strategy, the Port State Inspection Resolution should be reviewed, taking into account the FAO Port State Measures Agreement and each Member's domestic laws and regulations.

8.4 Monitoring expansion of SBT markets

The Commission and Members will actively monitor any possible SBT catch/ mortalities by Non-Cooperating Non-members (NCNMs) and/or the expansion of their SBT markets. This will include monitoring by MCS activities and regular review of SBT trade data.

Non-members and port States that are facilitating any fishing for SBT that is inconsistent with CCSBT obligations will be encouraged to cooperate with CCSBT measures. Action will be taken against IUU SBT fishing including the use of trade and market measures consistent with international law.

8.5 Exchange of compliance data

The Compliance Committee will continue to review policies and rules to facilitate exchange and sharing of MCS information among Members, and with port, market and coastal States as appropriate. This will include reviewing any necessary data confidentiality rules.

The Compliance Committee will promote the sharing of information amongst Members; other interested parties such as port States, market States, coastal States, other Regional Fisheries Management Organisations (RFMOs) and NGOs and the public. This will include actively removing barriers to information sharing, developing systems to lower the costs of information sharing, and adopting policies that maximise open access to Commission information.

8.6 Secretariat MCS services

The Secretariat will provide the Compliance Committee with compliance policy and process advice and assist with the specification and purchasing of shared compliance services.

This will include:

- a) conducting analyses of MCS data submitted, and reporting, on an annual basis, trends in MCS data;
- b) assessing the effectiveness of existing MCS measures based on data submitted to the Secretariat;
- c) managing and monitoring the CCSBT's compliance initiatives; and
- d) administration of compliance systems and programmes (for instance the Catch Documentation Scheme and reporting).

Subject to funding decisions, the Secretariat may provide the Commission with MCS services in circumstances where these can be provided cost-effectively and without conflicting with its core roles of Commission support, facilitation and information management. Such services may be provided through dedicated staff or contracted services.

8.7 Research & development

The Compliance Committee will recommend the commissioning of research on new technologies and methods aimed at facilitating implementation of MCS systems. Promising technologies will be trialled to assess their practicality and cost-effectiveness. Allocation of costs for such trials should be based on compliance risks and benefits. Depending on the technology and its application, trials may be funded by individual Members or collectively.

9.1 Auditing Members MCS systems and processes

Members' implementation, enforcement, and compliance with conservation and management measures and international obligations as they relate to CCSBT will be routinely audited.

The Compliance Committee will require Members to have their SBT MCS systems independently audited. These audits will focus on the systems and processes that each Member has implemented to meet its CCSBT obligations as defined by Compliance Policy Guideline 1, the Minimum Performance Requirements (MPRs). Audit reports will be made available to all Members. The purpose of these audits is to give the Member assurance on the adequacy of their MCS systems, identify areas of improvement, and assure the Commission that the Member is meeting its obligations.

9.2 Corrective action and remedies

The Compliance Committee will apply the CCSBT's Corrective Actions Policy to breaches in the rules of the CCSBT and establish incentives to promote compliance with CCSBT obligations.

The Compliance Committee will recommend an investigation where it has reasonable cause to believe that a Member is not complying with core conservation and management measures and obligations, in particular Catch Management Measures and MCS Measures. The results of an investigation will be considered by the Commission.

10.1 Assist developing country Members, and where appropriate Non-members, to comply with Commission requirements

The Compliance Committee will recommend that the Commission provide technical and financial assistance for Members to develop and implement MCS systems to meet their CCSBT obligations. Assistance may include:

- education, training and extension services
- technical consultancies
- sharing of services
- financial assistance.

The Compliance Committee will work with developing country Members to:

- a) identify areas where assistance would be beneficial to ensure they meet CCSBT obligations;
- b) identify ways in which assistance may be provided (e.g. up-skilling, secondments, workshops etc); and
- c) develop and implement a programme to assist developing countries with Commission requirements.

11.1 Inclusive cooperation

To promote broader implementation of CCSBT management measures, the Compliance Committee will:

- a) identify any NCNM SBT catches/ mortalities, and recommend that the cooperation of the relevant entities be sought;
- b) investigate and recommend ways of providing for the participation and/or cooperation of a wider range of actors such as Carrier Vessel Flag States that do not fish for SBT; and
- c) identify non-member States that have, or are likely to become, important port, market or coastal States for SBT. These States will be nominated to the Commission for it to consider whether to seek their cooperation with CCSBT management measures.

Part 2: Compliance Principles

In implementing this plan, decisions will be guided by the following principles:

Encouraging compliance: Members should be encouraged to comply with their CCSBT obligations through implementation of effective compliance systems.

Deterrence: Effective deterrence should be used to detect and apply sanctions against IUU fishing.

Accountability: Members should be held publicly accountable for meeting their CCSBT obligations.

Openness and transparency:

- a) Compliance information should be available to all Members.
- b) Discussions should be inclusive of all Members.
- c) All compliance reporting documents should be publicly available as soon as practicable (subject to Rule 10 of CCSBT Rules of Procedure).

Cooperation and collective action: Members should cooperate, including through collective action, to facilitate effective monitoring and improve levels of compliance.

Incentives: Positive incentives should be used to encourage Members to monitor and improve their compliance systems.

Efficiency: Compliance obligations should be able to be met cost-effectively, and not impose unreasonable costs on Members.

Risk management: A risk management approach should be used to determine changes or additions to conservation and management measures, and the systems and processes to support those measures.

Part 3: Roles and Responsibilities

Members

- Actively participate in the Commission's decision-making processes relating to policy, planning, and establishing conservation and management measures.
- Meet obligations and ensure compliance with the measures agreed to by the Commission.
- Maintain effective fisheries MCS systems and ensure that nationally-flagged vessels and authorised farms comply with the Member's rules.²
- Report to the Compliance Committee on the implementation of measures and obligations and any areas where improvement is needed to achieve effective compliance with measures and obligations.
- Report any material non-compliance detected and remedial action taken.
- Implement any corrective actions or remedies agreed by the Commission.

Commission

- Approve Compliance Plan and Five-Year Action Plan.
- Determine any corrective actions and remedies.
- Consider recommendations from the Compliance Committee and make final determinations.

Compliance Committee

- Recommend policy frameworks, guidelines, and technical assistance, to facilitate effective and consistent implementation of CCSBT measures by Members.
- Monitor the performance of Members' implementation of CCSBT measures.
- Carry out an annual compliance risk assessment.
- Review the Five-Year Action Plan (Appendix 1), based on identification of compliance risks, and recommend any updates.
- Recommend additions or changes to CCSBT obligations to address compliance risks.
- Review audit reports and recommend compliance audits.
- Recommend investigations of alleged serious non-compliance and, if necessary, recommend corrective actions or remedies.

Secretariat

- Facilitate constructive working relationships between Members.
- Facilitate inclusive, participative and transparent decision-making processes.
- Manage and distribute information that supports the role and responsibilities of Members and the Commission.
- Facilitate provision of educational, extension and technical services to support effective implementation of Commission measures.
- Prepare summary and discrepancy reports for the Compliance Committee.

² "Rules" include laws, regulations, and conditions on permits, licenses or authorisations.

- Provide advice to the Compliance Committee on compliance/ MCS policy, plans, guidelines and services.

Part 4: Plan Implementation and review

Implementation responsibilities

The Compliance Committee will be responsible for managing implementation of this plan under the direction and oversight of the Commission. This will include:

- annual review of compliance risks, and
- 5-yearly review and update of the Five-Year Action Plan.

The Compliance Committee will make recommendations on updates to the Action Plan, new obligations, policies, or other actions for consideration and determination by the Commission.

The Secretariat will provide technical and administrative support, and compliance policy advice, to both the Compliance Committee and the Commission.

Review

The Commission will review the Compliance Plan whenever the CCSBT Strategic Plan is reviewed. The Five-Year Action Plan (Appendix 1) will be reviewed by the Compliance Committee at least every five years.

CCSBT Compliance Plan (Revised at the Twenty-Sixth Annual Meeting: 17 October 2019)	DRAFT CCSBT Compliance Plan (To be revised at the Thirty-Second Annual Meeting: 9 October 2025)	Secretariat Comment
Purpose The Compliance Plan supports the CCSBT Strategic Plan, approved in October 2015. Specifically, it supports the vision for Category C: <i>“Members are actively participating in management of SBT through the Commission and implementing its decisions”.</i> The purpose of the Compliance Plan is to provide a framework for the Commission and Members to improve compliance, and over time, achieve full compliance with their CCSBT conservation and management measures. The Compliance Plan includes a Five-Year Action Plan to address priority compliance risks. The action plan will be reviewed and confirmed or updated at least every five years. The action plan is therefore a ‘rolling’ document and over time its emphasis will change. Throughout this document references to Members include Cooperating Non-Members	Purpose The Compliance Plan supports the achievement of the vision and goals defined in the CCSBT Strategic Plan, approved in October 2023. Specifically, it most strongly supports the vision that: <i>“Members¹ are actively participating in management of SBT through the Commission and implementing its decisions”.</i> The purpose of the Compliance Plan is to provide a framework for the Commission and Members to improve compliance and, over time, achieve and maintain full compliance with their CCSBT conservation and management measures obligations. CCSBT 31 endorsed the CCSBT Capacity Building Workplan which targets support and assistance to the areas of greatest need for developing country Members to help them to comply with CCSBT measures. The Capacity Building Workplan complements the CCSBT Corrective Actions Policy and both	Updated reference to the new Strategic Plan and to reflect the changes to the vision in this strategy. The purpose has been broadened to recognise that the Compliance Plan supports all of the vision and goals, but most strongly supports the participation and implementation by Members. Seeking full compliance over time is seen as a fundamental tenet of the Compliance Plan so this is recommended to be retained. However, maintaining full compliance when achieved is also important, so this has been included as a suggested addition to the purpose. As agreed at CC19, the CAP will be reviewed and updated as needed at CC annually. It is recommended that the risks are also reviewed and updated (as needed) annually. This recognises that compliance risks may change a lot in five years and will ensure that the review of the CAP is based on current compliance risks.

CCSBT Compliance Plan (Revised at the Twenty-Sixth Annual Meeting: 17 October 2019)	<i>DRAFT</i> CCSBT Compliance Plan (To be revised at the Thirty-Second Annual Meeting: 9 October 2025)	Secretariat Comment
of the Extended Commission (CNMs), and all references to the Commission include the Extended Commission (EC).	documents are key tools for establishing and maintaining high levels of compliance. The Compliance Plan includes a Five-Year Compliance Action Plan (CAP) to address priority compliance risks. Progress against the action plan will be reviewed by the Compliance Committee annually, with the CAP confirmed or updated every five years as required following this review. The action plan is therefore a dynamic ‘rolling’ document and over time its emphasis will change. Footnote 1: Throughout this document references to Members also includes Cooperating Non-Members of the Extended Commission (CNMs), and all references to the Commission include the Extended Commission (EC).	Text has been added outlining the link to the Capacity Building Plan, noting that this, along with the Corrective Actions Policy, are key supporting tools for increasing Member compliance. CC19 agreed to annual reviews of the CAP to ensure that the document is dynamic and responsive to changing risks and compliance needs. This annual review process has been extended to the compliance risks, which will also inform the review of the CAP, and will lessen the burden on Members to update these at the end of life of the plan. It is recommended that the text outlining how the term ‘Members’ is used in the document is moved to a footnote. This is because it is explanatory, rather than adding any substantive value to the Compliance Plan.
Structure This plan is in five parts: 1. Goals and Strategies 2. Compliance Principles 3. Roles and Responsibilities	Structure This plan is in five parts: 1. Goals and Strategies 2. Compliance Principles 3. Roles and Responsibilities	It is recommended that this text is retained, but strategies are removed as outlined in the text that follows.

CCSBT Compliance Plan <i>(Revised at the Twenty-Sixth Annual Meeting: 17 October 2019)</i>	DRAFT CCSBT Compliance Plan <i>(To be revised at the Thirty-Second Annual Meeting: 9 October 2025)</i>	Secretariat Comment
4. Plan implementation and review 5. Five -Year Action Plan (Appendix 1).	4. Plan implementation and review 5. Five -Year Compliance Action Plan (Appendix 1).	
Part 1: Goals and Strategies Goals The CCSBT Strategic Plan identifies four goals concerning participation and implementation by Members (Category C): • Monitoring, control, and surveillance (Goal 8) Integrated, targeted and cost-effective monitoring, control and surveillance measures are in place to ensure the Commission’s goals are met. • Members’ obligations (Goal 9) All Members comply with rules of CCSBT. • Supporting developing countries (Goal 10) Developing country Members are able	Part 1: Goals and Strategies Goals The CCSBT Strategic Plan contains specific targeted compliance-related goals that have informed, and been incorporated into, the high-level goals of the compliance plan: 1. Integrated, targeted and cost-effective measures are in place to monitor global SBT trade and assess compliance with CCSBT’s obligations.	The new Strategic plan contains targeted goals assigned to CC that are mostly identified for short-term delivery. So, these goals have been incorporated in suggested high-level compliance goals. The language in the first objective has been altered slightly to incorporate the language in the Strategic Plan goal to “Improve arrangements to collect and analyse the information of SBT distributed in the global market and consider strengthening relevant measures to monitor and control trade of SBT products in the markets”. It is proposed that specific references to Monitoring, Control and Surveillance (MCS) are removed from this goal, as MCS is undertaken mostly at the Member level, and the broader reference to “measures” can include both MCS measures and also broader tools such as monitoring of SBT trade.

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to comply with the Commission's management measures and other requirements. • Participation in the CCSBT (Goal 11) Ensure that all States and Regional Economic Integration Organisations (REIOs) and entities catching SBT are incorporated in the Commission and engaged in the cooperative management of SBT. Encourage the cooperation of port and market States with CCSBT's objectives and management arrangements	2. All Members achieve and maintain compliance with CCSBT rules and obligations. 3. Developing country Members are supported to build and sustain capacity to implement and comply with the Commission's management measures and obligations. 4. Ensure that all States, Regional Economic Integration Organisations (REIOs) and entities catching SBT are incorporated in the Commission and engaged in the cooperative management of SBT. Encourage the cooperation of port and market States with CCSBT's objectives and management arrangements.	Monitoring global SBT trade is undertaken principally through the CDS, but also through incorporating other (cost effective) external information sources into the compliance measures, including new information sources as these become available. This goal will also encompass the strategic plan goal to "Further increase efforts, including analysis on the application of electronic monitoring, to improve and supplement observer coverage in accordance with Scientific Observer Program Standard (SOPS)." The second goal aligns with the defined purpose of the compliance plan but references high rates of compliance rather than full compliance to recognise the duration of the plan (four years, whereas full compliance is the long-term goal). The third goal encompasses the strategic plan goal to "formulate and implement a capacity-building work plan to improve data collection, scientific analysis, and compliance related activities".

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		The fourth goal is carried over with no suggested changes.
Strategies Strategies are the suggested approach to achieve the goals and are numbered according to their corresponding goal. The strategies below are based on the strategies set out in the CCSBT Strategic Plan (pages 15-16). In some cases the titles have been modified, and the descriptions elaborated. Strategy 8.4 has been expanded to explicitly cover monitoring of IUU fishing by non-members.		It is proposed that the strategies be removed from the updated compliance plan, as these strategies are no longer present in the current CCSBT Strategic Plan. The strategies also added a lot of volume to the Compliance Plan, and some were repetitive of elements that were elsewhere in the Compliance Plan, or were covered in other CCSBT documents, such as the Terms of Reference for the Compliance Committee and CPG documents. It is recommended that these existing CCSBT documents be updated if Members believe that any points included in the previous strategies are essential to retain.
Part 2: Compliance Principles In implementing this plan, decisions will be guided by the following principles:	Part 2: Compliance Principles In implementing this plan, decisions will be guided by the following principles:	It is proposed that compliance principles be retained but updated to align them with the new goals included in the Draft Compliance Plan.

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<i>Encouraging compliance:</i> Members should be encouraged to comply with their CCSBT obligations through implementation of effective compliance systems. <i>Deterrence:</i> Effective deterrence should be used to detect and apply sanctions against IUU fishing. <i>Accountability:</i> Members should be held publicly accountable for meeting their CCSBT obligations. <i>Openness and transparency:</i> a) Compliance information should be available to all Members. b) Discussions should be inclusive of all Members. c) All compliance reporting documents should be publicly available as soon as practicable (subject to Rule 10 of CCSBT Rules of Procedure). <i>Cooperation and collective action:</i> Members should cooperate, including through collective action, to facilitate	<i>Targeted:</i> Compliance actions should prioritise non-compliance that presents the greatest risk to the achievement of CCSBT’s objectives. <i>Efficient:</i> Compliance actions should effectively identify and address non-compliance whilst not imposing unreasonable administrative burdens or costs on Members or the Secretariat. <i>Cooperative:</i> Members should cooperate with each other and the Secretariat, including through collective action, to facilitate effective monitoring and improve levels of compliance. <i>Inclusive:</i> Compliance actions should: a) be effective, whilst also considering the resources available to Members and the Secretariat. Where appropriate, improved compliance should be encouraged and supported, including proactively through the CCSBT Capacity Building Workplan.	Targeted: Supports goal one and also recognises the risk-based approach that was taken to developing the compliance action plan. Efficient: Also supports goal one to ensure actions and decisions are effective, but also consider the costs and burdens placed on Members. Cooperative: Contains the same text as the previous principle “Cooperation and collective action” but adds cooperation with the Secretariat. Inclusive part (a): Supports goal three, through recognising not all Members have the same resources available, and this may present challenges to implementation, so this principle seeks to encourage and support improved compliance (such as through the capacity building workplan) where appropriate. Inclusive part (b): Supports goal four, through seeking cooperation with other entities that

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effective monitoring and improve levels of compliance. <i>Incentives:</i> Positive incentives should be used to encourage Members to monitor and improve their compliance systems. <i>Efficiency:</i> Compliance obligations should be able to be met cost-effectively, and not impose unreasonable costs on Members. <i>Risk management:</i> A risk management approach should be used to determine changes or additions to conservation and management measures, and the systems and processes to support those measures.	b) encourage cooperation from all States, Regional Economic Integration Organisations (REIOs) and entities catching, receiving landings of, or trading SBT. Transparent: Sufficient information should be available to all Members to support thorough compliance assessment processes, develop targeted compliance actions and to inform appropriate responses to non-compliance. All compliance reporting documents should also be made publicly available. Responsive: Members should respond without undue delay to address incidents of non-compliance and improve systems and processes to prevent further non-compliance from occurring.	are involved in the harvesting or trade of SBT. Transparent: Focusses on ensuring that Members have the information they need to make informed compliance decisions and to support compliance actions. This principle will be supported by both Members and the Secretariat and is important to support the achievement of goal two. It also seeks to encourage the continuation of current CCSBT processes of making compliance reporting publicly available, which was in the previous transparency principle. However, the reference to the CCSBT Rules of Procedure has been removed, noting that this principle includes “should”, so it is an expectation, not a requirement. This principle would not impact in any way Members ability to request a report, or a specified part of a report, not to be made available for release. Responsive: Seeks to support goal two by encouraging Members to respond quickly to non-compliance and improve systems and processes to prevent further non-compliance

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		so that they achieve and maintain high rates of compliance.
Part 3: Roles and Responsibilities Members • Actively participate in the Commission’s decision-making processes relating to policy, planning, and establishing conservation and management measures. • Meet obligations and ensure compliance with the measures agreed to by the Commission. • Maintain effective fisheries MCS systems and ensure that nationally-flagged vessels and authorised farms comply with the Member’s rules.¹ • Report to the Compliance Committee on the implementation of measures	Part 3: Roles and Responsibilities Members • Actively participate in the Commission’s decision-making processes relating to policy, planning, and establishing conservation and management measures. • Meet obligations and ensure compliance with the measures agreed to by the Commission. • Maintain effective fisheries MCS systems and ensure that nationally-flagged vessels and authorised farms comply with the Member’s rules.¹² • Actively support the planning and delivery of compliance actions	The roles and responsibilities are proposed to be retained as they were, but with two small additional references: 1) to Member support to those actions identified in the CAP as having Member responsibility. 2) to Secretariat support to those actions identified in the CAP as having Secretariat responsibility. There are also some small additional editorial changes recommended to the roles and responsibilities. These broader roles and responsibilities contained in this section (beyond just the specific implementation of this plan) are seen as important to support the achievement of the objectives defined in this Compliance Plan.

^{1 2}“Rules” include laws, regulations, and conditions on permits, licenses or authorisations.

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and obligations and any areas where improvement is needed to achieve effective compliance with measures and obligations. • Report any material non-compliance detected and remedial action taken. • Implement any corrective actions or remedies agreed by the Commission. Commission • Approve Compliance Plan and Five-Year Action Plan. • Determine any corrective actions and remedies. • Consider recommendations from the Compliance Committee and make final determinations. Compliance Committee • Recommend policy frameworks, guidelines, and technical assistance, to facilitate effective and consistent implementation of CCSBT measures by Members.	identified as having Member (or shared) responsibility. • Report to the Compliance Committee on the implementation of measures and obligations and any areas where improvement is needed to achieve effective compliance with measures and obligations. • Report any material non-compliance detected, and remedial action taken. • Implement any corrective actions or remedies agreed by the Commission. Commission • Approve the Compliance Plan and Five-Year CAP Action Plan. • Determine any corrective actions and remedies, especially considering the application of the <u>Corrective Actions Policy</u> and <u>Capacity Building Workplan</u>.	It is proposed that “MCS” be removed from the reference to “compliance/ MCS policy, plans, guidelines and services”. MCS is implemented more at the Member level and focusses more on the tools used to monitor and improve compliance. It is proposed that the focus in the Compliance Plan should remain on the desired result, achieving improved/full compliance. The Compliance Committee responsibilities have been updated to support the annual review processes, which will allow the compliance work to be more responsive to changing risks and lessen the burden that will fall to Members at the end of the life of the plan.

CCSBT Compliance Plan (Revised at the Twenty-Sixth Annual Meeting: 17 October 2019)	<i>DRAFT</i> CCSBT Compliance Plan (To be revised at the Thirty-Second Annual Meeting: 9 October 2025)	Secretariat Comment
• Monitor the performance of Members' implementation of CCSBT measures. • Carry out an annual compliance risk assessment. • Review the Five-Year Action Plan (Appendix 1), based on identification of compliance risks, and recommend any updates. • Recommend additions or changes to CCSBT obligations to address compliance risks. • Review audit reports and recommend compliance audits. • Recommend investigations of alleged serious non-compliance and, if necessary, recommend corrective actions or remedies. Secretariat • Facilitate constructive working relationships between Members.	• Consider recommendations from the Compliance Committee and make final determinations decisions. Compliance Committee • Recommend policy frameworks, guidelines, and technical assistance, to facilitate effective and consistent implementation of CCSBT measures by Members. • Monitor the performance of Members' implementation of CCSBT measures. • Carry out an annual compliance risk assessment of identified compliance risks and update the compliance risks as needed, including following the review and update of the Compliance Plan. • Annually review progress against the Five-Year CAP Action Plan (Appendix 1), based on the identification and assessment of	

CCSBT Compliance Plan (Revised at the Twenty-Sixth Annual Meeting: 17 October 2019)	<i>DRAFT</i> CCSBT Compliance Plan (To be revised at the Thirty-Second Annual Meeting: 9 October 2025)	Secretariat Comment
• Facilitate inclusive, participative and transparent decision-making processes. • Manage and distribute information that supports the role and responsibilities of Members and the Commission. • Facilitate provision of educational, extension and technical services to support effective implementation of Commission measures. • Prepare summary and discrepancy reports for the Compliance Committee. • Provide advice to the Compliance Committee on compliance/ MCS policy, plans, guidelines and services.	compliance risks, and recommend any updates. • Recommend additions or changes to CCSBT obligations to address compliance risks. • Identify priorities for Quality Assurance Reviews (QARs), review audit QAR reports and recommend actions to address any identified issues or needs and recommend compliance audits. • Recommend investigations of alleged serious non-compliance and, if necessary, recommend corrective actions or remedies. Secretariat • Facilitate constructive working relationships between Members. • Facilitate inclusive, participative and transparent decision-making processes.	

CCSBT Compliance Plan <i>(Revised at the Twenty-Sixth Annual Meeting: 17 October 2019)</i>	<i>DRAFT</i> CCSBT Compliance Plan <i>(To be revised at the Thirty-Second Annual Meeting: 9 October 2025)</i>	Secretariat Comment
	• Manage and distribute information that supports the role and responsibilities of Members and the Commission. • Actively support the planning and delivery of compliance actions identified as having Secretariat (or shared) responsibility. • Facilitate provision of educational, extension and technical services to support effective implementation of Commission CCSBT measures. • Prepare summary and discrepancy reports for the Compliance Committee. • Provide advice to the Compliance Committee on compliance/MCS policy, plans, guidelines and services.	
Part 4: Plan Implementation and review	Part 4: Plan Implementation and review	The review and implementation section has been updated to reflect the discussion at CC19 and the decisions made by CCSBT31.

CCSBT Compliance Plan (Revised at the Twenty-Sixth Annual Meeting: 17 October 2019)	DRAFT CCSBT Compliance Plan (To be revised at the Thirty-Second Annual Meeting: 9 October 2025)	Secretariat Comment
Implementation responsibilities The Compliance Committee will be responsible for managing implementation of this plan under the direction and oversight of the Commission. This will include: • annual review of compliance risks, and • 5-yearly review and update of the Five-Year Action Plan. The Compliance Committee will make recommendations on updates to the Action Plan, new obligations, policies, or other actions for consideration and determination by the Commission. The Secretariat will provide technical and administrative support, and compliance policy advice, to both the Compliance Committee and the Commission. Review The Commission will review the Compliance Plan whenever the CCSBT Strategic Plan is reviewed. The Five-Year Action Plan (Appendix 1) will be reviewed by the	Review The Commission will review the Compliance Plan following any review of the CCSBT Strategic Plan. Progress against the actions outlined in the five-year Action Plan (CAP) will be reviewed annually by the Compliance Committee. The CAP may also be updated annually, based on the assessment of current and emerging compliance risks and the progress against defined actions. The CAP will be redeveloped every five years or following the review and update of the Compliance Plan. In this regard, the CAP is a dynamic document that will be amended as needed to best support the implementation of the Compliance Plan and address the identified compliance risks. Implementation responsibilities The Compliance Committee will be responsible for managing the implementation of this plan under the direction and oversight of the Commission. This will include:	The suggested approach is that the compliance risks be reviewed by the Compliance Committee annually to ensure that they remain relevant. CC19 agreed that the CAP also be reviewed and updated annually. It is proposed that this review will be based on any changes to the agreed compliance risks and progress against the reported actions. Ensuring that this is undertaken annually, as needed, will avoid any requirement for larger review processes every five years, which can be a burden for Members. It will also ensure that the CAP responds to the changing risks and compliance needs during the implementation period of the Compliance Plan.

CCSBT Compliance Plan <i>(Revised at the Twenty-Sixth Annual Meeting: 17 October 2019)</i>	<i>DRAFT</i> CCSBT Compliance Plan <i>(To be revised at the Thirty-Second Annual Meeting: 9 October 2025)</i>	Secretariat Comment
Compliance Committee at least every five years.	• the annual review of the compliance risks and identification of actions required to address new and emerging risks; • annual review of progress against the actions defined in the CAP, and recommend updates to these as necessary; • annual review and discussion of actions defined in the CAP for delivery in the twelve months following each Compliance Committee meeting and recommend updates to these actions as needed; • the review and recommendation of updates to the Compliance Plan following the review of the CCSBT Strategic Plan, and at other times as required; and • the redevelopment of a new five-year CAP following the review of the Compliance Plan.	

CCSBT Compliance Plan <i>(Revised at the Twenty-Sixth Annual Meeting: 17 October 2019)</i>	<i>DRAFT</i> CCSBT Compliance Plan <i>(To be revised at the Thirty-Second Annual Meeting: 9 October 2025)</i>	Secretariat Comment
	The Secretariat and Members will report annually to the Compliance Committee on the progress against actions contained within the five-year CAP. The Compliance Committee will make recommendations on updates to the CAP (including to respond to changes in identified compliance risks), new obligations, policies, or other actions for consideration and determination by the Commission. The Secretariat will provide technical and administrative support, and compliance policy advice, to both the Compliance Committee and the Commission.	
Part 5: Five -Year Action Plan Agreed at CC19.	Appendix One: Five -Year Compliance Action Plan	The CAP adopted by CCSBT31 will be reattached as Appendix One to the Compliance Plan. It is recommended this remain an appendix to the plan, recognising the intention for the CP and CAP to be reviewed and updated at different times to keep the update processes more manageable.

DRAFT CCSBT Compliance Plan

(To be revised at the Thirty-Second Annual Meeting: 9 October 2025)

Purpose

The Compliance Plan supports the achievement of the vision and goals defined in the CCSBT Strategic Plan, approved in October 2023. Specifically, it most strongly supports the vision that:

“Members¹ are actively participating in management of SBT through the Commission and implementing its decisions”.

The purpose of the Compliance Plan is to provide a framework for the Commission and Members to improve compliance, and over time, achieve and maintain full compliance with their CCSBT obligations.

CCSBT 31 endorsed the CCSBT Capacity Building Workplan which targets support and assistance to the areas of greatest need for developing country Members to help them to comply with CCSBT measures. The Capacity Building Workplan complements the CCSBT Corrective Actions Policy and both documents are key tools for establishing and maintaining high levels of compliance.

The Compliance Plan includes a Five-Year Compliance Action Plan (CAP) to address priority compliance risks. Progress against the action plan will be reviewed by the Compliance Committee annually, with the CAP confirmed or updated as required following this review. The action plan is therefore a dynamic document and over time its emphasis will change.

Structure

This plan is in five parts:

1. Goals
2. Compliance Principles
3. Roles and Responsibilities
4. Plan implementation and review
5. Five -Year Compliance Action Plan (Appendix 1).

Part 1: Goals

Goals

The CCSBT Strategic Plan contains specific targeted compliance-related goals that have informed, and been incorporated into, the high-level goals of the compliance strategy:

1. Integrated, targeted and cost-effective measures are in place to monitor global SBT trade and assess compliance with CCSBT obligations.
2. All Members achieve and maintain compliance with CCSBT rules and obligations.
3. Developing country Members are supported to build and sustain capacity to implement and comply with the Commission’s management measures and obligations.

¹ Throughout this document references to Members also includes Cooperating Non-Members of the Extended Commission (CNMs), and all references to the Commission include the Extended Commission (EC)

4. Ensure that all States, Regional Economic Integration Organisations (REIOs) and entities catching SBT are incorporated in the Commission and engaged in the cooperative management of SBT. Encourage the cooperation of port and market States with CCSBT's objectives and management arrangements.

Part 2: Compliance Principles

In implementing this plan, decisions will be guided by the following principles:

Targeted: Compliance actions should prioritise non-compliance that presents the greatest risk to the achievement of CCSBT's objectives.

Efficient: Compliance actions should effectively identify and address non-compliance whilst not imposing unreasonable administrative burdens or costs on Members or the Secretariat.

Cooperative: Members should cooperate with each other and the Secretariat, including through collective action, to facilitate effective monitoring and improve levels of compliance.

Inclusive: Compliance actions should:

- a) be effective, whilst also considering the resources available to Members and the Secretariat. Where appropriate, improved compliance should be encouraged and supported, including proactively through the CCSBT Capacity Building Workplan.
- b) encourage cooperation from all States, Regional Economic Integration Organisations (REIOs) and entities catching, receiving landings of, or trading SBT.

Transparent: Sufficient information should be available to all Members to support thorough compliance assessment processes, develop targeted compliance actions and to inform appropriate responses to non-compliance. All compliance reporting documents should also be made publicly available.

Responsive: Members should respond without undue delay to address incidents of non-compliance and improve systems and processes to prevent further non-compliance from occurring.

Part 3: Roles and Responsibilities

Members

- Actively participate in the Commission's decision-making processes relating to policy, planning, and establishing conservation and management measures.
- Meet obligations and ensure compliance with the measures agreed to by the Commission.
- Maintain effective fisheries MCS systems and ensure that nationally flagged vessels and authorised farms comply with the Member's rules.²
- Actively support the planning and delivery of compliance actions identified as having Member (or shared) responsibility.

² "Rules" include laws, regulations, and conditions on permits, licenses or authorisations.

- Report to the Compliance Committee on the implementation of measures and obligations and any areas where improvement is needed to achieve effective compliance with measures and obligations.
- Report any material non-compliance detected, and remedial action taken.
- Implement any corrective actions or remedies agreed by the Commission.

Commission

- Approve the Compliance Plan and Five-Year CAP.
- Determine any corrective actions and remedies, especially considering the application of the [Corrective Actions Policy](#) and [Capacity Building Workplan](#).
- Consider recommendations from the Compliance Committee and make final decisions.

Compliance Committee

- Recommend policy frameworks, guidelines, and technical assistance, to facilitate effective and consistent implementation of CCSBT measures by Members.
- Monitor the performance of Members' implementation of CCSBT measures.
- Carry out an annual assessment of identified compliance risks and update the compliance risks as needed, including following the review and update of the Compliance Plan.
- Annually review progress against the Five-Year CAP (Appendix 1), based on the identification and assessment of compliance risks, and recommend any updates.
- Recommend additions or changes to CCSBT obligations to address compliance risks.
- Identify priorities for Quality Assurance Reviews (QARs), review QAR reports and recommend actions to address any identified issues or needs.
- Recommend investigations of alleged serious non-compliance and, if necessary, recommend corrective actions or remedies.

Secretariat

- Facilitate constructive working relationships between Members.
- Facilitate inclusive, participative and transparent decision-making processes.
- Manage and distribute information that supports the role and responsibilities of Members and the Commission.
- Actively support the planning and delivery of compliance actions identified as having Secretariat (or shared) responsibility.
- Facilitate provision of educational, extension and technical services to support effective implementation of CCSBT measures.
- Prepare summary and discrepancy reports for the Compliance Committee.
- Provide advice to the Compliance Committee on compliance policy, plans, guidelines and services.

Part 4: Plan Implementation and Review

Review

The Commission will review the Compliance Plan following any review of the CCSBT Strategic Plan. Progress against the actions outlined in the five-year CAP will be reviewed annually by the

Compliance Committee. The CAP may also be updated annually, based on the assessment of current and emerging compliance risks and the progress against defined actions. The CAP will be redeveloped every five years or following the review and update of the Compliance Plan. In this regard, the CAP is a dynamic document that will be amended as needed to best support the implementation of the Compliance Plan and address the identified compliance risks.

Implementation Responsibilities

The Compliance Committee will be responsible for managing the implementation of this plan under the direction and oversight of the Commission. This will include:

- the annual review of the compliance risks and identification of actions required to address new and emerging risks;
- annual review of progress against the actions defined in the CAP, and recommend updates to these as necessary;
- annual review and discussion of actions defined in the CAP for delivery in the twelve months following each Compliance Committee meeting and recommend updates to these actions as needed;
- the review and recommendation of updates to the Compliance Plan following the review of the CCSBT Strategic Plan, and at other times as required; and
- the redevelopment of a new five-year CAP following the review of the Compliance Plan.

The Secretariat and Members will report annually to the Compliance Committee on the progress against actions contained within the five-year CAP.

The Compliance Committee will make recommendations on updates to the CAP (including to respond to changes in identified compliance risks), new obligations, policies, or other actions for consideration and determination by the Commission.

The Secretariat will provide technical and administrative support, and compliance policy advice, to both the Compliance Committee and the Commission.

Appendix One: Five -Year Compliance Action Plan

(To be attached once the Compliance Plan is agreed and approved)