Commission for the Conservation of
Southern Bluefin Tuna

みなみまぐろ保存委員会

CCSBT–CC/2510/09

Review of Compliance Risks and Progress Against the CCSBT Compliance Action Plan for 2025 – 2029

1. Introduction

The Compliance Action Plan (CAP) sits within the CCSBT Compliance Plan and identifies the priority CCSBT compliance risks and agreed compliance actions to address these risks.

The CAP for 2025-2029 was agreed by the 19th meeting of the Compliance Committee (CC19) and subsequently endorsed by the Thirty-First Annual Meeting of the Commission and Extended Commission (CCSBT31).

CC20 will conduct the first review of the CAP for 2025-2029. The purpose of this review is to ensure that the CAP remains relevant, discuss progress against priority actions and ensure that the CAP continues to effectively address the key CCSBT compliance risks. The review will achieve this through re-evaluating the current CCSBT risks and assessing the progress against the defined compliance actions for 2025, with both updated as needed. As part of the review, CC20 will also discuss and assess the priority upcoming actions, especially those planned for advancement or delivery in 2026.

Therefore, to achieve this, there are three parts to the review of the CAP by CC20:

1. The review of the Compliance Risks, including the risk assessment (matrix score) to ensure that the risk and assessments (matrix scores) remain relevant. This should also identify and consider any emerging or new compliance risks.
2. The review and assessment of progress against actions identified for advancement or delivery in 2025. This includes consideration of whether the actions or timeframes may need to be adjusted to ensure effective delivery and that the actions are responding to the risk and supporting the compliance goals of CCSBT.
3. The discussion and review, as needed, of actions to be delivered through the remainder of the CAP implementation period, with a specific focus on those actions to be delivered in the following twelve-month period. This should consider any changes that resulted from the review of compliance risks and also weigh the resources available to Members and the Secretariat to deliver these actions.

2. Background

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

> *"…. recommended that the CAP becomes a five-year plan from 2021 onwards with the caveat that it is reviewed rigorously on an annual basis as part of a standing agenda item and is as such considered to be 'a living document".*[1]

This recommendation was subsequently agreed at the Twenty-Sixth Annual Meeting of the Commission and Extended Commission (CCSBT26).

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[1] Paragraph 85 (second bullet point) of CC14's annual report

In 2023, work commenced on a draft revised CAP. The Fourth Meeting of the Technical Compliance Working Group (TCWG 4) identified and agreed on fifteen compliance risk items, and progress was made at both TCWG 4 and Eighteenth Meeting of the Compliance Committee (CC18) on identifying CAP action items to address these risks. Further intersessional work followed CC18, and the CAP was completed at CC19 in 2024.

CC19 also supported the addition of a standing agenda item to review the CAP as a 'living document' on an annual basis as previously agreed at CCSBT26.

3. Review of the Compliance Risks

As noted in the previous section of this paper, it has been two years since the compliance risks that inform the CAP were initially agreed. So, it is important that CC20 review the compliance risks and assessed risk scores, to ensure that these still accurately reflect the key compliance risks currently faced by CCSBT.

The current CCSBT compliance risks and assessed matric scores for each risk are included in table 1 below.

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

Table 1 – CCSBT Compliance Risks

The current CCSBT risks were thoroughly discussed and agreed at the Fourth Meeting of the Technical Compliance Working Group (TCWG4) in 2023. It is not recommended that this detailed process be undertaken in the annual reviews, but it is suggested that Members undertake a focussed review of the current risks with an emphasis on two key questions:

- Do the current risks and the associated assessed risk levels still reflect the current CCSBT compliance risks?
- Are there any new or emerging compliance risks that are not captured in the current CCSBT risks?

4. Review of Progress Against Compliance Actions in 2025

A list of the CAP actions marked for progress in 2025 has been included in a table in **Attachment A** of this paper. Some actions for 2025 relate to topics that have dedicated sessions on the CC20 agenda. It is proposed that discussion on these items should occur under these dedicated agenda items, rather than under the review of the CAP. This will ensure the actions are considered in terms of the broader related work being undertaken. These actions have been indicated in the table in **Attachment A** also.

Therefore, the discussion in this section will focus on the six actions planned for advancement in 2025 that do not have a related agenda item elsewhere in the CC20 agenda.

4.1. Ensure Members meet reporting requirements as they relate to describing how they monitor, estimate and report all SBT mortalities (risk 3 and 4). Delivery in 2025 and 2026.

This action relates to the risks of incomplete reporting of SBT and not fully attributing all SBT mortalities. The key reporting obligation related to this action is the requirement that each Member and Cooperating Non-member of the Extended Commission submit a national report to the Compliance Committee[2]. The key sections of the national reports that describe how Members monitor, estimate and report SBT mortalities are Section 2.1 (especially Sections 2.1.2 and 2.1.3) and Section 2.2.

In addition to the national reports, the Secretariat reporting on Compliance with CCSBT Measures also contains information on the reporting of SBT mortalities that Members have provided in the preceding twelve months.

Members may also wish to consider any opportunities to strengthen the current Secretariat reporting against CCSBT obligations to ensure that this continues to provide the information Members need to assess the Member reporting against these requirements. A summary of the CCSBT obligations, and the related Secretariat reporting against these obligations, was provided to Members as part of the intersessional work on the review of the Corrective Actions Policy. The obligations associated with Members monitoring, estimating and reporting all SBT mortalities, and the related Secretariat reporting is included for Members as **Attachment C** to this paper.

We would therefore recommend that Member's consider the Section 2.1 and 2.2 of Member's national reports, the Secretariat reporting on Compliance with CCSBT Measures (**CCSBT-CC/2510/04**) and **Attachment C** to inform the discussion at CC20.

[2] Required under Procedural Rule 10 of the Terms of Reference for the Compliance Committee

4.2. Consider the costs and benefits of genetic testing in markets and whether to conduct such testing and report back to the CC (risk 7). Delivery in 2025 and 2026.

This action also aligns with an ongoing action in the CAP to 'continue work on development of in-situ real-time genetic testing kits to identify SBT and report progress to the CCSBT annually'. We therefore encourage Members to provide updates to CC20 on any further progress in the development of in-situ real-time genetic testing kits, especially as this progress will impact the costs and relative utility of using this technology. At CC19, Australia also undertook to provide a paper to CC20 providing information on the development by Australia's Commonwealth Scientific and Industrial Research Organisation (CSIRO) of in-situ rapid genetic testing to discriminate all Thunnus and skipjack tuna species. This paper will also provide important information to inform Members consideration of the potential costs and benefits of genetic testing.

Further, when considering the benefits of genetic testing, it is important for Members to recall the risk that this action is trying to address. This action seeks to address the risk that SBT is misreported as other (non SBT) species. The existing monitoring and verification measures currently in place in specific markets will contribute to the relative risk of misreported SBT being present. Therefore, monitoring measures already in place in markets should be considered for potential application. In this regard, the Secretariat would highlight the strong measures in place across the CCSBT Membership (including through the CDS implementation and other domestic measures) and suggest that the greatest risk is very likely presented by markets outside of the CCSBT Membership. However, there are challenges in deploying this technology in markets outside of the CCSBT Membership.

The 2021 CCSBT Performance Review noted the benefit of genetic testing in identifying unaccounted SBT mortalities, however the application of the tests in the report related to transhipments, rather than use in markets. The review report noted:

> *"A final issue related to SBT UAM was the possibly huge gap related to tuna transshipments at sea, due to the great difficulty to reliably identify SBT from physical characteristics, especially when looking at a frozen carcass. This means that whenever observers think they have detected non-reported transshipments of SBT at sea, it can never be proven (via photos). A possible solution to this problem, some suggested, would be the use of portable genetic testing (random), which is presently lacking."(Page 14)*

The benefits of genetic testing in transhipment monitoring have been recognised at many previous CCSBT meetings, including at the Eleventh Meeting of the Compliance Committee (CC11) where the meeting strongly endorsed a Secretariat recommendation that:

> *"Members and the Secretariat should monitor developments in the effectiveness and availability of practical on-site genetic testing kits (for tuna species identification) so that any such tools developed can be considered for use by transhipment observers in the future and in the meantime look to collect samples for DNA analysis."*

The CAP includes the action for delivery in 2027 to "consider the feasibility of transhipment observers taking tissue samples as part of the IOTC/ICCAT transhipment observer programmes and report back to the CC" (Action 7C). In order for the Compliance Committee to consider the feasibility of transhipment observers taking samples for genetic testing, it is important that, if possible, some testing is undertaken using observers to provide the information on which the CC may make its assessment (a proof of concept). It is therefore suggested that CC20 consider recommending that work commence in 2026 on developing a small, targeted proof of concept for transhipment observers taking samples for genetic testing, specifically to inform the consideration of this by CC22. It is recommended that this focus on the IOTC region, noting that the collaboration agreement with IOTC, memorandum of understanding (MOU) with FAO, is still yet to be agreed. This means that any trial of genetic testing could be discussed and agreed with IOTC as part of the discussions in defining the collaboration agreement. CCSBT Members who also participate in IOTC are also encouraged to raise this issue within that forum.

4.3. Review procedures and methods to improve compliance by SBT fishing operators with seabird CMMs and reporting requirements concerning seabird interactions (risk 10). Delivery in 2025.

This action was taken from the CCSBT Multi-year Seabird Strategy, which also included four specific sub-actions which are all discussed below. The timeframe for reporting against these actions is defined in the Seabird Strategy as a "report back at ERSWG16" (2026).

a. Reviewing existing procedures and methods, including for in-port and transhipment at-sea inspections, and when other monitoring and surveillance technologies and techniques are used.

When reviewing the existing procedures, Members may wish to consider the following points.

- As identified in the 2021 CCSBT Performance Review, Members do not use the CCSBT report of inspection results (contained in Annex B of the Resolution) to report port inspection information. Most port inspection reports received continue to use the IOTC or ICCAT inspection report instead, so CCSBT never receives any additional data on the bycatch mitigation measures from these forms.
  - There is a tasking in the CAP to "Examine the feasibility of increasing the 5% inspection requirement for foreign fishing/carrier vessels landing/transhipping SBT in port and report back to the CC" that is currently scheduled for delivery in 2028. This may present an opportunity to review this as part of a broader review of the Port State Measures Resolution.
- Noting that this action includes reference to transhipment, Members may wish to consider opportunities to strengthen the monitoring of compliance with seabird CMMs when reviewing the CCSBT Transhipment Resolution at CC20 (Agenda Item 6.3). Any consideration of this may also include:
  - Extending the monitoring requirements for observers in those RFMO areas where there is no high seas boarding and inspection programme.
  - Ensuring that additional monitoring tasks do not diminish performance of tasks undertaken as part of this core monitoring role.
  - Introduction of additional observer training and reporting requirements.
  - The opportunity for further strengthening of the Transhipment Resolution when it is next reviewed (currently in the CAP for delivery in 2028).
- When considering other monitoring and surveillance technologies, those Members currently implementing Electronic Monitoring (EM) are encouraged to report on the benefits and challenges of using EM to support increased monitoring of compliance with ERS related CMMs.

b. Considering implementation, where appropriate, of additional monitoring and surveillance technologies and techniques.

It is recommended that this should be based on the results of discussions undertaken in relation to the previous action.

c. Considering options for management responses concerning non-compliance.

The Terms of Reference for the Compliance Committee describes the functions of the Compliance Committee. These functions include that the Compliance Committee will "*make recommendations to the Extended Commission on new compliance measures, including measures to address non-compliance and measures to ensure that accurate and timely data is obtained on all fisheries*". The Compliance Committee annually considers all identified non-compliance and options to strengthen management responses. It is therefore suggested that there are already structures in place that ensure this occurs.

d. Considering the development of options to enable, particularly for high seas SBT fishing fleets, the timely reporting of non-compliance events.

CCSBT has a MCS Information Collection and Sharing Policy (CPG4) and this was updated in 2019 to provide a process and format for sharing of information in cases where a Member has reasonable grounds to suspect a vessel is conducting IUU fishing or fishing activity relating to SBT. The Policy expects Members "to respond to any information received that indicates potential non-compliance, and advise the Member, Port State, coastal State or market State providing the information of the response taken". The Policy also establishes the role for the Secretariat to "provide a confidential pathway for information to be exchanged". It is therefore recommended that this Policy already provides for the timely reporting of non-compliance events.

4.4. 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 (risk 10). Delivery in 2025.

The Secretariat has worked with the IMCS Network who have developed a report to support Members' review of data collection forms and procedures across tuna RFMOs regarding compliance with seabird CMMs by longline fishing operators. The Secretariat would like to acknowledge the important support provided by the IMCS Network and the Tuna Compliance Network in developing this report. This report is included as **Attachment D** to this paper.

The report includes a comparison of the data reporting and collection forms and procedures regarding seabird reporting and compliance across the tuna RFMOs that are included in the CCSBT Resolution to Align ERS Measures.
Overall, operator level requirements for reporting seabird interactions are predominantly based on Member reporting requirements specified in each RFMO. In this regard, a Member needs to ensure that it has sufficient information to meet its reporting requirements specified in that RFMO through its application of domestic reporting requirements.

Operator level reporting requirements may differ across Members based on a range of factors. However, it is important to note that the CCSBTs ERS data exchange and ERSWG reporting obligations do include reporting elements that would likely require some uniformity in the data and information collected by operators across all areas where SBT are caught. Therefore, these requirements may already be providing some level of harmonisation of data collected by CCSBT authorised vessels across the different RFMO areas. The Secretariat welcomes further Member discussion on this.

The Seabird Strategy was updated at CCSBT 31 and this resulted in the timeframe for this action being updated to reporting back to ERSWG 17 (2028). In considering the next steps and noting the amount of information for Members to consider in completing this action, CC20 may wish to consider amending the timeframe for completion of this action to align with the updated timeframe in the Seabird Strategy. This would allow for more consideration and discussion on if, and how, Members may wish to develop a "harmonised format to communicate and advocate across tuna RFMOs". In considering this element of the action, Members may also wish to recall the harmonisation of vessel reporting requirements across CCSBT authorised vessels already provided by the existing CCSBT Member ERS reporting obligations.

4.5. *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 (risk 14). Delivery in 2025.*

The pressures on Secretariat resources remain and these continue to present a risk to the ability of the Secretariat to continue to effectively monitor and assess compliance. There are two key work areas that are additional to the business-as-usual (BAU) tasks and reporting undertaken by the Secretariat. These work areas are the eCDS development and the Indonesia transhipment trial. In looking ahead towards workload in the immediate future, both of these work areas will very likely continue to place increased demands on Secretariat resources. However, the degree of impact will depend on the decisions of the Commission. The additional demands presented by both of these work areas are discussed below, along with the forecast increases in general compliance tasks in the coming year.

4.5.1. *eCDS Development*

During the current year, the Secretariat has continued to develop the eCDS system, support Member testing of the eCDS and updating the CDS Resolution to ensure that it supports the transition from the current paper-based system to an electronic system. The Secretariat convened two meetings of the eCDS working group in 2025, as well as leading intersessional virtual communication.
The current planned eCDS implementation date is 1 April 2026, but this is dependent on Members agreement to an updated Resolution at CCSBT 32. If this implementation date is maintained, the Secretariat's focus after the annual meetings will need to move to supporting more intensive Member testing and development, refining and further developing the resources to support eCDS use and refining the Secretariat reporting on eCDS implementation (as required in the Resolution). The CAP also includes an action focussed on Member capacity building to support the eCDS implementation. The Secretariat will therefore need to develop and deploy resources to support Members in their implementation of the eCDS. Alongside these additional tasks, the Secretariat will need to continue to reconcile eCDS data and support Member use of the eCDS.

4.5.2. *Indonesia transhipment trial*

The Indonesia transhipment trial has resulted in a significant increase in the amount of transhipment data that the Secretariat receives, enters and manages. The Secretariat received a total of 628 transhipment declarations for transhipments that occurred between 1 November 2023 and 31 December 2024 that reported a transfer of SBT. Of these 53 (around 8%) related to transhipments that did not involve Indonesian flagged vessels. Not all transhipment declarations were received from Indonesia during the early stages of the implementation of the transhipment trial and therefore the actual total of Indonesian SBT transhipments is likely higher.

The Indonesian transhipment trial has resulted in **twelve-fold increase in the Secretariat transhipment workload**.

The Secretariat was not resourced, nor did it have systems, to manage this amount of transhipment data and this remains a significant pressure on Secretariat resources.

4.5.3. General Secretariat Compliance Tasks

During 2025, the CAP included four actions that were required to be completed during 2025. During 2026, this will increase to ten actions, and delivery of these actions will very likely require additional Secretariat time and support.

4.5.4. Resourcing Considerations

Currently the Secretariat relies on two casual part-time positions to support ongoing delivery of Secretariat services, these being a Data Entry Officer (principally undertaking CDS data entry) and a Compliance Assistant (principally managing data related to the Indonesian transhipment trial). The CDS data entry requirements will decrease significantly following the eCDS implementation, although the CDS support requirements are expected to increase significantly, and some data entry capability will still be required, particularly to support data entry where offline forms are used. There will also be a transition period during which the Secretariat will need to support both paper forms and the eCDS.

The Indonesian transhipment trial is being reviewed at CC20, so the ongoing requirements for the Compliance Assistant will depend on the decisions made as a result of this review.

The fact that these staff work remotely means that incorporating them in new compliance tasks can be more difficult. There are also limitations on both the Compliance Assistant and Data Entry Officer in being able to take on extra tasks at present. In addition, being part-time casual positions, there is less certainty around continuity of this resource at a time that this additional support is becoming more essential to the ongoing work of the Secretariat. The total hours worked by these two casual part-time staff members in the last financial year (1 July 2024 to 30 June 2025) equated to just over 82 days, however this could have been higher had the staff had more availability. It is anticipated that the Secretariat will require increased support to continue to effectively deliver all compliance services over the coming years.

4.6. Encourage Members to support and advocate for the adoption of boarding and inspection CMM in IOTC (risk 15). Delivery in 2025 and 2026.

This action was assigned member responsibility, and the Secretariat welcomes Members discussion on progress related to this action.

Review of Priority Actions

The actions that are marked for advancement or delivery in 2026 are included in **Attachment B** to this paper. The ten actions planned for completion in 2026 have been highlighted yellow and some of these actions are discussed in this paper. The Secretariat welcomes Member discussion on the priority actions for delivery in 2026.

Summary

The Secretariat invites Members to:

- Review the current CCSBT compliance risks and update if necessary;
- Discuss and review of the progress against compliance actions in 2025, and consider;
    - How Members currently report the monitoring, estimating and reporting of all SBT mortalities and the compliance with these reporting requirements;
    - The costs and benefits of genetic testing in markets;
    - The development of a small, targeted proof of concept for transhipment observers taking samples for genetic testing in order to inform the consideration of this issue in at CC 22;
    - The current procedures and methods for monitoring compliance with Seabird CMMs undertaken by Members and consider, where appropriate, implementation of additional monitoring and surveillance technologies and techniques;
    - Reporting to ERSWG16 that Actions 4B (c) and (d) have been completed and that:
        - The Compliance Committee annually considers all identified non-compliance and options to strengthen management responses.
        - The MCS Information Collection and Sharing Policy (CPG4) provides the mechanism for the timely sharing and reporting of non-compliance events.
    - Updating the timeframe for the completion of Action 10B to allow for Members to consider the information provided and for Compliance Committee to report back to ERSWG17 (2028). Depending on the time Members feel is necessary to consider and progress this action, the date could extend into 2027 if required.
    - Review the current and future (expected) workload of the Secretariat and the resourcing implications of upcoming decisions relating to the Indonesian transhipment trial and eCDS;
    - Provide any update, on current Member efforts to support and advocate for the adoption of boarding and inspection CMM in IOTC.
- Discuss and review the priority actions for advancement and delivery in 2026, especially considering the risk these actions address and the resources of Members and the Secretariat to deliver on these actions.

Prepared by the Secretariat

Attachment A
Actions for Advancement or Delivery in 2025

Key:

Blue Text	To be discussed under other focussed agenda items
	Actions currently scheduled for delivery in 2025

Risk Item	Matrix Score (H/M/L)	Action	Timeframe	Responsibility	Secretariat Comment
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.	2025 – 2026	Members and the Secretariat	eCDS developments are discussed under CC20 agenda item 5.
		b) Expedite (e)CDS capacity building for Members and Member stakeholders.	2025 – 2027	Members and the Secretariat	
2. Incomplete implementation or submission of (e)CDS data including Non-Members not cooperating with the CDS Resolution.	**M**				
3. Incomplete reporting of SBT mortalities.	**H**	a) Ensure Members meet reporting requirements as they relate to describing how they monitor, estimate and report all SBT mortalities.	2025 – 2026	Members, Secretariat and ESC	Discussed in the paper and seeking Member input.
		b) Consider strengthening corrective actions policies.	2025 – 2026	Members	The review of the Corrective Actions Policy (CPG3) will be discussed under CC20 agenda item 6.4.
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.	2025 – 2026	Members Secretariat and CC	Discussed in the paper and seeking Member input.

Risk Item	Matrix Score (H/M/L)	Action	Timeframe	Responsibility	Secretariat Comment
5. Non-compliance associated with transhipment obligations (both in port and at-sea).	**M**				
6. Incomplete submission of transhipment information including transhipment information for non-Member flagged vessels.	**L/M**	a) Strengthen CCSBT's Transhipment Resolution including considering the introduction of supply declarations in 2025.	2025 and 2028	Members	The update of the Transhipment Resolution will be discussed under agenda items 6.1 and 6.3.
		b) Improve and enhance the existing information sharing arrangements between CCSBT and other RFMOs with respect to transhipment information.	2025 – 2026	Members and Secretariat	This will be discussed under agenda items 6.2 and 7.3.
7. SBT mis-reported as other (non SBT) species.	**M**	b) Consider the costs and benefits of genetic testing in markets and whether to conduct such testing and report back to the CC.	2025 – 2026	Members and Secretariat	Discussed in the paper and seeking Member input.
8. Catches of SBT that are not reported by Non-Cooperating Non-Members (NCNMs) and so not taken into account.	**L/M**				
9. Insufficient scientific observer data to manage target and non-target species.	**M/H**				
10. Incomplete or inaccurate reporting of non SBT bycatches, including seabirds.	**H**	a) Review procedures and methods to improve compliance by SBT fishing operators with seabird CMMs and reporting requirements concerning seabird interactions.	2025	CC, Members and Secretariat	Discussed in the paper and seeking Member input.
		b) Review data collection forms and procedures across tuna RFMOs regarding compliance with seabird	2025	CC, Members and Secretariat	Discussed in the paper and seeking Member input.

Risk Item	Matrix Score (H/M/L)	Action	Timeframe	Responsibility	Secretariat Comment
		CMMs by longline fishing operators and develop harmonised format to communicate and advocate across tuna RFMOs.			
11. CCSBT Members not fully **implementing** specific Conservation and Management Measures (CMM's) as agreed, particularly the CCSBT ERS Measure.	**L**				
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**	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.	2025 – 2026	Members and Secretariat	To be considered in the agenda item 2.3.2 and seeking Member input (particular developing State Members identification of specific needs).
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.	2025 – 2026	Members and Secretariat	The review of the Corrective Actions Policy (CPG3) will be discussed under agenda item 6.4. Member reporting is also included in this review.
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.	2025	Members and Secretariat	Discussed in the paper and seeking Member input.
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.	2025 – 2026	Members	Discussed in the paper and we welcome Member feedback on any progress against this action.

Attachment B
Actions for Advancement or Delivery in 2026

Key:		Actions currently scheduled for delivery in 2026

Risk Item	Matrix Score (H/M/L)	Action	Planned Delivery	Responsibility
1. Non-compliance with the (e)CDS or incorrect information in (e)CDS documents.	**L/M**	c) To continue to move towards implementation of the eCDS as soon as possible.	2025 – 2026	Members and the Secretariat
		d) Expedite (e)CDS capacity building for Members and Member stakeholders.	2025 – 2027	Members and the Secretariat
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.	2026 – 2028	Members and the Secretariat
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.	2025 – 2026	Members, Secretariat and ESC
		b) Consider strengthening corrective actions policies.	2025 – 2026	Members
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.	2025 – 2026	Members Secretariat and CC
5. Non-compliance associated with transhipment obligations (both in port and at-sea).	**M**	a) Review if arrangements have been implemented to ensure transhipment obligations are in place and report back to the Compliance Committee (CC).	2026 – 2027	Members

Risk Item	Matrix Score (H/M/L)	Action	Planned Delivery	Responsibility
		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.	2026 – 2027	Members and the Secretariat
6. Incomplete submission of transhipment information including transhipment information for non-Member flagged vessels.	**L/M**	b) Improve and enhance the existing information sharing arrangements between CCSBT and other RFMOs with respect to transhipment information.	2025 – 2026	Members and Secretariat
		c) Introduce relevant punitive measures as part of a more comprehensive Corrective Actions approach (review of Corrective Actions Policy).	2026 – 2028	Members and Secretariat
7. SBT mis-reported as other (non SBT) species.	**M**	b) Consider the costs and benefits of genetic testing in markets and whether to conduct such testing and report back to the CC.	2025 – 2026	Members and Secretariat
8. Catches of SBT that are not reported by Non-Cooperating Non-Members (NCNMs) and so not taken into account.	**L/M**			
9. Insufficient scientific observer data to manage target and non-target species.	**M/H**	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.	2026	Members
10. Incomplete or inaccurate reporting of non SBT bycatches, including seabirds.	**H**			

Risk Item	Matrix Score (H/M/L)	Action	Planned Delivery	Responsibility
11. CCSBT Members not fully **implementing** specific Conservation and Management Measures (CMM's) as agreed, particularly the CCSBT ERS Measure.	**L**			
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.	2026 – 2027	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.	2025 – 2026	Members and Secretariat
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.	2025 – 2026	Members and Secretariat
14. The increasing demands of work limiting the ability of the Secretariat to assess compliance.	**M/H**			
15. Lack of comprehensive monitoring and inspection of vessels on the High Seas.	**L/M**	c) Encourage Members to support and advocate for the adoption of boarding and inspection CMM in IOTC.	2025 – 2026	Members

Attachment C
Member Obligations and Secretariat Reporting Related to Monitoring, Estimating and Reporting all SBT Mortalities

Obligation	Secretariat Reporting
Catch/Allocation Reporting	**Paper: Compliance with Measures - Attachment A and Member Annual Reports**
• All fishing-related SBT mortality is reported annually to the Extended Scientific Committee, for incorporation into stock assessment analysis, and to the Commission. o This is also required for notifications of carry forward of unfished quota to the next quota year.	**CwM Attachment A:** All sources of SBT mortality **<u>as advised by Member/CNM</u>** (as advised in Members' carry-forward advice received in xxxx)
	Commercially caught/retained mortality *Reported as whether or not this was provided (✓, F, P or X), no quantities given in the attachment.*
	Release/discard/other sources of mortality. *Reported as whether or not this was provided (✓, F, P or X) and the quantity provided in Member reporting.*
	Recreational mortality *Reported as whether or not this was provided (✓, F, P or X) and the quantity provided in Member reporting.*
	Customary or artisanal mortality *Reported as whether or not this was provided (✓, F, P or X) and the quantity provided in Member reporting.*
	Scientific Data Exchange o Total Catch by Fleet o Catch and Effort *Reported as whether or not this was provided (✓, F, P or X), no quantities given in the attachment.*
	Member Annual Reports Members are required to report against: *Catch and allocation* *Allowances and SBT mortality for each sector* *SBT Catch (retained and non-retained)*
• Monthly Catch Reporting o Report monthly and cumulative catch electronically to Executive Secretary no later than the last day of the month following fishing.	**CwM Attachment A:** Monthly Catch Reports *Reported as whether or not monthly reports have been provided on time, no quantities given in the attachment.*
• Reporting of initial allocations by vessel/company o Provide within two months of the start of the fishing season, the yearly SBT quota and catch allocation arrangements for this fishery either by company, quota holder or vessel.	**CwM Attachment A:** Quota Allocation & Final Catch per entity *(due between xx/xx/xx & xx/xx/xx)* Initial Allocation *Reported as whether or not initial allocation were provided on time, no quantities given in the attachment.*
• Reporting of final catch by vessel/company: o Provide within six months of the end of the fishing season, the final SBT catch against quota by company, quota holder or vessel at the completion of a vessel's fishing period or fishing year.	**CwM Attachment A:** Quota Allocation & Final Catch per entity *(due between xx/xx/xx & xx/xx/xx)* Final Catch by Vessel *Reported as whether or not final catch was provided on time, no quantities given in the attachment.*
Member Annual Reports	**Paper: Compliance with Measures - Attachment A**
• Four weeks prior to the convening of the Compliance Committee, each Member and Cooperating Non-member of the Extended Commission will provide a report providing the following	xxxx Members' Reports: Is all information required by Templates provided *A single assessment of the entire Member report and if all information has been provided across all requirements.*

<table>
<tr><td>information:</td><td></td></tr>
<tr><td>

Summary of Monitoring, Control and Surveillance (MCS) Improvements

Improvements achieved in the current fishing season
Extraordinary Circumstances
Future planned improvements
Progress with actions taken to rectify any non-compliance

</td><td></td></tr>
<tr><td rowspan="7">

SBT Fishing and MCS

Fishing for Southern Bluefin Tuna
Monitoring catch of SBT
SBT Towing and transfer to and between farms (farms only)
SBT transhipment (in port and at sea)
Port Inspections of Foreign Fishing Vessels/Carrier Vessels (FVs/CVs) with SBT/SBT Products on Board
Monitoring of trade of SBT
Coverage and Type of CDS Audit undertaken

</td><td>2.1 Fishing for Southern Bluefin Tuna
2.1.1 Catch and allocation
2.1.2 Allowances and SBT mortality for each sector
2.1.3 SBT Catch (retained and non-retained)
2.1.4 The number of vessels in each sector</td></tr>
<tr><td>2.2 Monitoring catch of SBT
2.2.1 Daily logbooks
2.2.2 Additional reporting methods (such as real time monitoring programs)
2.2.3 Scientific Observers
2.2.4 Vessel Monitoring System (VMS)
2.2.5 At-sea inspections
2.2.6 Authorised vessel requirements
2.2.7 Monitoring of catch of SBT from other sectors (e.g. recreational, customary, etc)</td></tr>
<tr><td>2.3 SBT Towing and transfer to and between farms (farms only)
Observer coverage of tows (%)
Observer coverage of transfers (%)
Plans to allow adoption of the stereo video systems</td></tr>
<tr><td>2.4 SBT transhipment (in port and at sea)
Quantities and percentage of SBT transhipped at sea and in port
List of LSTLVs which have transhipped at sea and in port
Comprehensive report assessing the content and conclusions of observer reports assigned to CVs that received SBT from flagged LSTLVs.</td></tr>
<tr><td>2.5 Port Inspections of Foreign Fishing Vessels/Carrier Vessels (FVs/CVs) with SBT/SBT Products on Board
The number of landing/ transhipment operations that foreign FVs/CVs carrying SBT or SBT product made in port.
The number of those landing/ transhipment operations that were inspected.
The number of inspections where infringements of CCSBT’s measures were detected.</td></tr>
<tr><td>2.6 Monitoring of trade of SBT
The percentage of landings of SBT that were inspected.
The percentage of exports of SBT that were inspected.
The percentage of imports of SBT that were inspected.</td></tr>
<tr><td>2.7 Coverage and Type of CDS Audit undertaken
Details on the level of coverage and type of audit undertaken in accordance with 5.8 of the CDS Resolution, and the level of compliance.</td></tr>
<tr><td>

Annex 1. Standing items: details of MCS arrangements used to monitor SBT catch in the fishery.

Monitoring catch of SBT

SBT Towing and transfer to and between farms (farms only)
SBT Transhipment (in port and at sea)
Port Inspections of Foreign FVs/CVs with SBT/SBT Products on Board
Landings of Domestic Product (from both fishing vessels and farms).
Monitoring of trade of SBT

SBT Exports
SBT Imports
SBT Markets
Other MCS systems of relevance

Additional Reporting Requirements Ecologically Related Species

</td><td></td></tr>
</table>

Attachment D

IMCS NETWORK

Seabird Mitigation Measures and associated Data Collection and Procedures across tuna RFMOs

August 2025

1. Summary

The IMCS Network[1] has prepared this report in support of the Commission for the Conservation of Southern Bluefin Tuna (CCSBT). Specifically, this report seeks to assist the Compliance Committee in its considerations in relation to action item (b) under Risk Item 10 of the CCSBT Compliance Action Plan (CAP). This report brings together information to support the Compliance Committee '*review data collection forms and procedures across tuna RFMOs regarding compliance with seabird CMMs by longline fishing operators'*. The IMCS Network has worked with the CCSBT Secretariat to identify how this report can best support the work of the Compliance Committee and has prepared this report based on a desktop analysis of publicly available information. Consultation has also been undertaken with the Compliance Managers in each RFMO discussed in this report.[2]

This report reviews the data collection requirements regarding seabird interactions and mitigation measures implemented by longline fishing operators in regional fisheries management organisations (RFMOs) recognised in CCSBT's Ecologically Related Species Resolution (ICCAT, IOTC and WCPFC)[3]. It highlights the similarities and differences in the collection forms and procedures in relation to seabird reporting for each RFMO, noting that reporting requirements exist at both Member[4] and operator levels. The report outlines the different reporting requirements at Member and operator level, along with the different levels of required monitoring (observer and/or electronic monitoring) within each RFMO.

Tuna RFMOs' conservation measures specify various operator level reporting requirements that apply both within national jurisdiction as well as the high seas. However, most operator level reporting requirements are left to the discretion of the relevant Member upon consideration of its own suite of national and international obligations. Further, CCSBT's Ecologically Related Species (ERS) annual data exchange and biennial reporting obligations include broad reporting requirements in relation to seabird interactions for vessels operating in the Convention areas of ICCAT, IOTC and WCPFC. These reporting requirements extend to datasets in addition to observer data and therefore require Members to apply detailed operational level reporting for their vessels operating across each RFMO's area of competence.

If the Compliance Committee wishes to effectively consider any harmonisation of reporting requirements, as identified in Action 10b of the CAP, Members' input will be required to specify and discuss their fleets' operator level reporting requirements. These requirements differ between Members based on their national approaches and also the respective RFMO obligations of each Member.

[1] The IMCS Network is a global informal organisation that promotes and facilitates communication, cooperation, coordination, and capacity development across the fisheries MCS, compliance and enforcement community (https://imcsnet.org/). CCSBT is a member of the IMCS Network.
[2] The IMCS Network would also like to acknowledge the support of the Tuna Compliance Network in completing this report.
[3] International Commission for the Conservation of Atlantic Tunas (ICCAT), Indian Ocean Tuna Commission (IOTC), Western and Central Pacific Fisheries Commission (WCPFC).
[4] The term 'Member' is used to cover all country-level representation at RFMOs and includes Members, Contracting Parties, Cooperating Non-Contracting Parties and other related terms.

2. Overview across RFMOs

RFMOs require different levels of detail regarding reporting on seabird interactions and use of mitigation measures. These differences exist across each RFMO at both Member and operator levels. However, there is a clear expectation within each RFMO for longline operators to report basic data related to seabird interactions. At a minimum, these reporting requirements would generally support recording species interactions in Member annual reports to respective Commissions. Complementing this, scientific observer programs provide crucial, and often more detailed, monitoring of seabird interactions and mitigation efforts. As such, RFMO's actual observer coverage rates are important for evaluating the scope and reliability of the collected data. Tuna RFMOs are also increasingly adopting e-monitoring in an effort to enhance existing monitoring levels.

The variation of RFMO reporting requirements at the Member level is likely to flow to data collection procedures and fields collected at the operator level. In this respect, each CCSBT Member's operational reporting may differ depending on whether it operates across all ICCAT, IOTC and WCPFC - or only a subset of those. Similarly, Members may regulate their vessels' seabird operational requirements based on specific area of operation linked to different RFMO requirements (e.g. high seas vs. in zone, or based on latitude). As outlined in **Table 1** below, of all CCSBT Members[5], only the European Union, Japan and Republic of Korea are Members across all relevant tuna RFMOs.

Table 1: RFMO membership of CCSBT Members

CCSBT Member	ICCAT	WCPFC	IOTC
Australia	No	Yes	Yes
European Union	Yes	Yes	Yes
Fishing Entity of Taiwan	Yes	Yes	No[6]
Indonesia	No	Yes	Yes
Japan	Yes	Yes	Yes
Republic of Korea	Yes	Yes	Yes
New Zealand	No	Yes	No
South Africa	Yes	No	Yes

WCPFC appears to have the most detailed seabird reporting requirements with CMM 2022-06 requiring daily catch and effort data reporting at the vessel level that includes key information about seabird

[5] In this document, the term "CCSBT Members" means the Member of the Extended Commission of the Commission of the Conservation for Southern Bluefin Tuna.
[6] Whilst Taiwan is not an IOTC Member, it does participate in the work of IOTC under the designation of "Invited Experts".

interactions. IOTC also captures operational data at a trip and set/shot frequency (in annual reports as specified in Resolution 15/01). However, seabird data are not broken down by species and only provide a high-level count of catch. ICCAT reporting requirements stem from Recommendation 07-07 and Supplemental Recommendation 11-09. The current ICCAT Domestic Observer Program forms (ST09) require a list of all mitigation measures currently in place on a vessel. Members can then report their relevant mitigation measures in the CP44 (Implementation of Seabird Mitigation Measures) form, together with any additional explanatory text submitted through the ICCAT Integrated Online Management System (IOMS).

WCPFC, IOTC and ICCAT each rely heavily on scientific observer programs for detailed monitoring of seabird interactions and operators' use of mitigation measures. Monitoring data from observers and/or e-monitoring provide valuable data inputs for recording species-specific bycatch data and information on mitigation implementation. In this respect, observer coverage rates are an important metric for assessing the reliability and representativeness of seabird data. However, observer coverage levels differ between RFMOs and therefore the analytical value drawn from these datasets is inconsistent (see "Observer coverage requirements" in Comparative Analysis Table, Section 6). WCPFC has a baseline requirement of 5% observer coverage for longline vessels, but Members' achieved observer coverage rates differ (including as a result of increased Bigeye Tuna catch limits resulting from corresponding increased observer/e-monitoring coverage under CMM 2023-01). IOTC's Resolution 23/07 emphasises data collection through observers where observer programs are implemented. CCSBT's Scientific Observer Program aims for 10% observer[7] coverage (representative of different vessel-types in distinct areas and time). Actual observer coverage rates within CCSBT and other tuna RFMOs across years can vary significantly. This raises challenges with detecting statistically rare events such as interactions with seabirds. In addition, e-monitoring is recognised within WCPFC, IOTC and ICCAT as a tool for enhancing monitoring and data verification and increasing existing monitoring coverage.

The operator level reporting requirements applied by Members to their vessels may differ based on range of factors. These include:

a) national bycatch policy and bycatch mitigation requirements – including national decisions regarding prescribed or approved mitigation measures (noting all CCSBT-related RFMOs include regulation of some areas within national jurisdiction);
b) membership to RFMOs and the corresponding RFMO obligations regarding seabird reporting and mitigation; and
c) policy decisions made by each Member regarding their fisheries management approaches and associated vessel-level reporting requirements (e.g. within IOTC whether that Member participates in the Regional Observer Scheme and chooses to use observer data instead of logbook data to meet their annual seabird reporting requirements).

The ability for Members to verify a vessel's compliance with seabird mitigation requirements also differs depending on the availability of independent monitoring data to verify compliance. This includes the use

[7] This includes monitoring by either human observers deployed physically onboard vessels, or reviewed catch and effort data from electronic monitoring systems.

and coverage of observer schemes and e-monitoring systems, and the occurrence and rate of at-sea boardings and inspections and/or port inspections.

3. WCPFC

CMM 2018-03 is the WCPFC's conservation measure to mitigate the impact of fishing for highly migratory fish stocks on seabirds. Paragraph 8, CMM 2018-03 requires WCPFC Members to report information describing which mitigation measures they require their vessels to use, as well as the technical specifications for each of those measures, in Part 2 of their annual reports to the Commission. Members must also report any changes made to their required mitigation measures or their technical specifications in subsequent years.

WCPFC Members must annually provide to the Commission, in Part 1 of their annual reports, all available information on interactions with seabirds reported or collected by observers to enable the estimation of seabird mortality in all WCPFC fisheries (para. 13, CMM 2018-03). These reports shall include information on:

1. The proportion of observed effort with specific mitigation measures used; and
2. Observed and reported species-specific seabird bycatch rates and numbers or statistically rigorous estimates of species-specific seabird interaction rates (for longline, interactions per 1,000 hooks) and total numbers.

Annual reporting requirements covered in CMM 2022-06 (CMM on daily catch and effort reporting) also specify seabird interaction reporting. Paragraph 2(iii) provides that "*information recorded for each day with fishing operations shall, at a minimum, include the following … iii. Interaction information about other species not listed in those sections, but required to be reported by CCMs under other Commission decisions such as, inter alia, cetaceans, seabirds and sea turtles*".

Monitoring and verification of Members' compliance with seabird mitigation requirements under CMM 2018-03 are undertaken via compliance assessment based on Members' annual reporting, and also through information gathered from observers, port inspections and high seas boardings and inspections. However, these data collection and verification activities (observer, port and at-sea inspections) have limited coverage across longline fleets. The observed data available on the use of mitigation methods is based on only modest levels of observer coverage, rarely exceeding 10% for any fleet.[8] As a result, evaluating the efficacy of seabird mitigation measures remains a challenge.[9] In addition, some analyses within the Western and Central Pacific Ocean have indicated that non-reporting by Members was not uncommon with potential increased levels of non-reporting in higher latitude of both hemispheres.[10]

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[8] WCPFC-SC20-2024/EB-IP-27 "Distribution and trends of reported observed seabird bycatch mitigation use in the WCPFC Convention Area".

[9] Birdlife International Observer Paper to WCPFC TCC: Advice to the TCC 20 on Straddling Sets: Clarification of RFMO seabird bycatch mitigation requirements for timing of longline setting", 13 September 2024 (WCPFC-TCC20-2024-OP02).

[10] As above. Note, this paper is focused on the WCPFC reporting requirements under its CMM 2018-03. WCPFC's seabird mitigation requirements are more detailed than in other tuna RFMOs (e.g. IATTC Resolution C-11-02, ICCAT

4. IOTC

Resolution 23/07 (On reducing incidental bycatch of seabirds in longline fisheries) regulates seabird data reporting and mitigation measure requirements in IOTC. Resolution 23/07 establishes annual reporting as the primary mechanism for demonstrating compliance, with Members collecting specific data on seabird bycatch through scientific observer programs or, alternatively, through vessel logbooks for those not fully participating in the observer scheme. As a result, operator level reporting requirements applied by Members may differ depending on whether that Member participates in the observer scheme.

Resolution 23/07 details three key reporting requirements for CPCs (paragraphs 1, 2 and 3):

1. CPCs shall record data on seabird incidental bycatch by species, notably through scientific observers in accordance with Resolution 22/04 and report these annually. Observers shall to the extent possible take photographs of seabirds caught by fishing vessels and transmit them to national seabird experts or to the IOTC Secretariat, for confirmation of identification.
2. CPCs that have not fully implemented the provisions of the IOTC Regional Observer Scheme outlined in paragraph 3 of Resolution 22/04 shall report seabird incidental bycatch through logbooks, including details of species, if possible.
3. CPCs shall provide to the Commission as part of their annual reports, information on how they are implementing this measure.

IOTC also has a specific bycatch data collection form for reporting (Form 1IN) that contains additional elements specific to Resolution 23/07.[11] However, Form 1IN's actual data fields are minimal and high level. On top of standard metadata (Liaison Officer, Organisation, Reporting Year, Reporting Entity, Flag State), Form 1IN metadata only covers the fishery, IOTC area and interactions with "seabirds (in number)" for longliners. For each stratum, the data coverage – i.e., the percentage (%) of occurrences of interactions sampled – derived from the coverage type must be reported to assess the representativeness and quality of the estimates. That means Boats, Fish (in numbers), Fish (in weight), Number of hooks, sets or trips.

In annual reporting, Resolution 15/01 (On the recording of catch and effort data by fishing vessels in the IOTC area of competence) applies. This resolution requires reporting on seabird data ("seabirds (in number)"), however "when a CPC is fully implementing the observer program the provision of seabird data is optional" (Resolution 15/01 Annex II para. 2.3). In addition, any interactions with seabirds should be recorded in the remarks (Resolution 15/01 Annex II para. 2.4(2)). These data, if accurately collected and reported, is minimal and limited in scope. For example, "information… shall be completed for each set/shot/operation of the fishing gear" which includes number and weight (Resolution 15/01 Annex II para. 2.2), but only the "number of seabird interactions" within "catch species" not speciated (Resolution 15/01 Annex II para. 2.3).

Recommendation 11-09, or IOTC Resolution 12/06) and consequently allow for more detailed analysis of distribution and trends of reported observed use of seabird bycatch mitigation methods.

[11] for more detailed analysis of distribution and trends of reported observed use of seabird bycatch mitigation methods. https://data.iotc.org/reference/latest/forms/Form-1IN.html.

The CCSBT Resolution to Align ERS Measures requires CCSBT Members fishing in the IOTC Convention Area to comply with IOTC's Resolution 23/07. CCSBT Members are also required to provide reports on their interactions with ecologically related species[12], indicating that reporting of seabird bycatch data would be expected from CCSBT Members fishing under IOTC's jurisdiction.

5. ICCAT

ICCAT Recommendation 07-07 mandates CPCs to record and regularly report seabird interactions and incidental catches. CPCs are required to collect and provide all available information to the ICCAT Secretariat on interactions with seabirds, which includes incidental catches by their fishing vessels. This is a broad requirement to share any data related to seabird bycatch.

All vessels fishing south of 20˚S must carry and use bird scaring lines in accordance with specific parameters (Recommendation 07-07, para. 4). Vessels targeting swordfish using monofilament longline gear and using weighted lines and night setting, may derogate from the requirement to carry and use bird scaring lines (para. 5). CPCs with vessels relying on this derogation are obligated to inform the Standing Committee on Research and Statistics of their scientific findings resulting from their observer coverage of these vessels. This highlights the importance of observer data in the assessment of effectiveness of chosen seabird mitigation measures.

The CCSBT Resolution to Align ERS Measures requires CCSBT Members fishing in the ICCAT Convention Area to comply with ICCAT's ERS measures, which includes Recommendation 07-07. CCSBT Members are also required to provide annual reports on their interactions with ecologically related species[13], indicating that reporting of seabird bycatch data would be expected from CCSBT Members fishing under ICCAT's jurisdiction.

Note, Recommendation 07-07 does not provide specific details on the forms to be used for data collection or the precise procedures for reporting beyond the general obligations mentioned above. However, specific reporting forms are drawn from Supplemental Recommendation 11-09 paragraphs 7 and 9:

a) Para. 7: the CP44 Form[14] requires an outline of relevant mitigation measures; and
b) Para. 9: ST09 form[15] provides fields for observers' submission of mitigation measures currently in place.

The ICCAT Secretariat has advised[16] that Contracting Parties can provide additional explanatory text regarding implementation of seabird mitigation measures through the ICCAT Integrated Online Management System (IOMS).

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[12] This includes a summary of CPUE, and total numbers of seabird incidentally caught by area and fleet and a summary of seabird captures from sources other than observers.
[13] This includes a summary of CPUE, and total numbers of seabird incidentally caught by area and fleet and a summary of seabird captures from sources other than observers.
[14] https://iccat.int/Forms/CP44-BirdMit-TRI.docx.
[15] https://iccat.int/Forms/ST09-DomObPrg.xlsx.
[16] Through direct consultation with ICCAT Secretariat.

6. Comparative Analysis Table

The table below provides insights into the similarities and differences across RFMOs' data reporting and collection forms and procedures regarding seabird reporting and compliance.

	WCPFC	IOTC	ICCAT	CCSBT
Applicable Measures (CMM /Res./ Rec.)	**CMM 2018-03** (CMM to mitigate the impact of fishing for highly migratory fish stocks on seabirds) **CMM 2022-06** (CMM on daily catch and effort reporting): "*Information recorded for each day with fishing operations shall, at a minimum, include the following ...* *iii. Interaction information about other species not listed in those sections, but required to be reported by CCMs under other Commission decisions such as, inter alia, cetaceans, seabirds and sea turtles*." (CMM 2022-06, para 2(iii))	**Resolution 23/07** On reducing the incidental bycatch of seabirds in longline fisheries (supersedes Resolution 12/06) **Resolution 15/01** On the recording of catch and effort data by fishing vessels in the IOTC area of competence: Specifically for longliners, reporting should include *"seabirds (in number)"* though *"when a CPC is fully implementing the observer program the provision of seabird data is optional"* (Resolution 15/01 Annex II para 2.3). In addition, "*any interactions with whale sharks (Rhincodon typus), marine mammals, and seabirds should be recorded in the remarks*" (Resolution 15/01 Annex II para 2.4(2)).	**Recommendation 07-07** on Reducing Incidental By-Catch of Seabirds in Longline Fisheries **Supplemental Recommendation 11-09** on Reducing Incidental By-Catch of Seabirds in ICCAT Longline Fisheries	**Resolution to Align CCSBT's Ecologically Related Species measures with those of other tuna RFMOs** When fishing outside the Areas of Competence of other tuna RFMOs, CCSBT Members and CNMs required to use tori lines in all longline SBT fisheries below 30 degrees south. However, when fishing within the Areas of Competence of IOTC, WCPFC, or ICCAT, they are obligated to comply with the ERS Measures in force in that area (whether or not the Member or Cooperating Non-Member is a member of the tuna RFMO), as outlined in ERS Alignment Resolution (Annex I).

	WCPFC	IOTC	ICCAT	CCSBT
Mitigation measure requirements	All requirements stipulated in CMM 2018-03: **South of 30°S**: Vessels fishing must use at least 2 of 3 measures: weighted branch lines, night setting, or tori lines. Alternatively, hook-shielding devices may be used as a stand-alone measure. **25°S - 30°S**: Vessels required to use one of the following mitigation measures: weighted branch lines, tori lines, or hook-shielding devices. This requirement does not apply in EEZs of French Polynesia, New Caledonia, Tonga, Cook Islands and Fiji. **North of 23° North:** Large-scale longline vessels (24m or more) must use at least two mitigation measures from Columns A and B, including at least one from Column A. Small-scale LL vessels (<24m) must use at least one measure from Column A. **Column A:** Side setting w/ bird curtain and weighted branch lines; night setting with minimal deck lighting; tori line;	Requirements under Resolution 23/07 (which supersedes Resolution 12/06): **South of 25°S**: All longline vessels fishing shall use at least two of the three mitigation measures listed: Night setting with minimum deck lighting; Bird-scaring lines (Tori lines); Line weighting) OR use hook-shielding devices as a stand-alone measure. Other areas: These measures should also be considered for implementation in other areas, as appropriate, consistent with scientific advice.	The relevant measures include Recommendation 07-07 and Supplemental Recommendation 11-09: **South of 25°S**: Vessels must use at least two of the following mitigation measures: night setting, bird scaring line (BSL) and branch line weighting (para 3, Rec 11-09). Between **20°**and **25°S**: vessels shall use bird-scaring lines (tori poles), however when targeting swordfish with monofilament longline gear, can alternatively use night setting and weighted branch lines – (para 5, Rec 07-07).	As per applicable RFMO having competence over the area in which a vessel is fishing. Noting that when CCSBT Members and Cooperating Non-Members fish outside the Areas of Competence of these RFMOs, they are required to use Tori lines in all longline SBT fisheries below 30 degrees south.

	weighted branch line; hook shielding devices. **Column B**: Tori line; Blue-dyed bait; Deep setting line shooter; Management of offal discharge.			

	WCPFC	IOTC	ICCAT	CCSBT
	In areas between 25°S and 23°N, CCMs encouraged to have LL vessels employ one or more measures in Columns A and B.			
Observer coverage requirements	Minimum 5% annual observer coverage, measured by fishing effort (e.g. number of hooks, sets, or days). Potentially higher observer coverage levels (through both human observers and/or e-monitoring) achieved through operation of CMM 2023-01 linked to increases in Bigeye tuna catch limits. Note, this only applies to CN, ID, JP, KR, CT and US and is voluntary as implemented at the discretion of those	Minimum 5% annual observer coverage, measured by the number of operations or sets, for vessels 24m and above, and for vessels <24m if operating outside EEZ of flag CPC within IOTC Area (Resolution 22/04). Resolution 22/04 allows for observer coverage requirements to be complemented or substituted by e-monitoring systems.	Minimum 5% observer coverage, measured by fishing effort, for each fishery and gear type.[17] In 2023, ICCAT adopted Rec 23-18, setting minimum standards for e-monitoring in LL and PS fisheries.[18] This is in addition or complementary to the human observer requirements.	Target coverage of 10% for catch and effort monitoring for each fishery, specified in the Scientific Observer Program Standards (SOPS). "Observer coverage" is defined as monitoring by either human observers deployed physically onboard vessels, or reviewed catch and effort data from electronic monitoring system.

[17] Doc. No. COC-317 / 2021 – Implementation of REC. 16-14: Scientific Observer Programmes.
[18] See 23-18 – Recommendation by ICCAT to Establish Minimum Standards and Programme Requirements for the use of Electronic Monitoring Systems (EMS) in ICCAT Fisheries.

	Members seeking increased catch limits.			
Data Collection Forms	*Part 1 Annual Report* CMM 2018-03, para 13: *All available information on interactions with seabirds reported or collected by observers to enable the estimation of seabird mortality in all [WCPFC] fisheries.... These reports shall include information on:* a) *The proportion of observed effort with specific mitigation measures used.* b) *Observed and reported species-specific seabird bycatch rates and numbers or statistically rigorous estimates of species-specific seabird interaction rates (for longline, interactions per 1,000 hooks) and total numbers*. This reporting includes a number of tables, including: a) Effort observed and estimated seabird captures by fishing year for each CCM. With, for each year, the total number of hooks; the number of observed hooks; observer	*1IN Form* On top of standard metadata (Liaison Officer, Organisation, Reporting Year, Reporting Entity, Flag State). This data collection report only covers the fishery, IOTC area and interactions with "Seabirds (in number)" for longliners. Note, when a CPC is fully implementing the observer program the provision of seabird data is optional. Any additional information regarding seabird interactions is noted in the remarks. For each stratum, the data coverage i.e. % of occurrences of interactions sampled, derived from the coverage type, must be reported to assess the representativeness and quality of the estimates. That means Boats, Fish (in numbers), Fish (in weight), Number of hooks, sets, trips. Annex II of the Res 15/02 contains "information for purse seine, longline, gillnet and pole and line operations and catch, which shall	*CP44-BirdMit* This form covers the "implementation of seabird mitigation measures" including the specific mitigation measure (Night setting with minimum deck lighting/Bird-scaring lines (Tori lines)/Line weighting) with corresponding information, specifically: implemented (y/n), area, details of implementation status of NPOA on seabirds. This form is only applicable for "All CPCs operating fisheries in which seabirds may be taken incidentally". Rec 07-07 does not provide specific details on data collection forms or the reporting procedures beyond the general obligations mentioned above. It mandates the recording and regular reporting of seabird interactions and incidental catches by CPCs and emphasises the importance of observer data. Mechanisms for vessels to record data on seabird	*ERSWG Data Exchange* Since 2013, the ERSWG Data Exchange has been an annual process in which ERS data for the immediately preceding calendar year are provided by 31 July each year, following the agreed format including the proportion of observed effort with specific seabird mitigation measures per Member, year, fishery and strata. "Resolution to Align CCSBT's Ecologically Related Species measures with those of other tuna RFMOs" (i.e. CCSBT Members have to follow ERS measures for other relevant tuna RFMOs to reduce duplication, ensure consistency). Members and CNMs will provide national reports on their interactions with ecologically related species in SBT fisheries to the ERSWG. CCSBT Secretariat shall annually

	coverage (the percentage of hooks that were observed); the number of observed captures (both dead and alive); and the capture rate (captures per thousand hooks) b) Proportion of mitigation types used by the fleet in a given year a) Number of observed seabird captures in [CCM] longline fisheries by species and area in a given year	be completed for each set/shot/operation of the fishing gear" which includes number of seabird interactions within "catch species" details however these are not speciated.	interactions, including incidental catches, with the intention of regular reporting to the Commission are required as per Rec 11-09 (para 7).	present a report to the Compliance Committee on the implementation of the ERS Measures. 'ERS Measures' mean all measures relating to ecologically related species in force in IOTC, WCPFC, and ICCAT. The CCSBT Annual Report for the Compliance Committee and the Extended Commission covers the main monitoring methods (Daily Logbook, Real Time Monitoring Programs, Scientific Observers, Other/EM). Currently, Members report observed and estimated seabird captures, in a 5-degree square stratum, annually through the ERS data exchange using a specified format.
Operational-level reporting	Pacific Island countries use a regional SPC/FFA Regional Longline Logsheet (expanded format) that contains fields for recording retention or discard of 'other species' (as well as standard catch and effort data).[19] This standardised log has been developed to	No data reporting forms or formats available online. Operational level reporting determined by Member based on its relevant RFMO reporting requirements. Note, IOTC Members may choose to implement their reporting	No data reporting forms or formats available online. Operational level reporting determined by Member based on its relevant RFMO reporting requirements.	Vessel level reporting requirements are only contained within ERS Measure (which triggers the requirements to meet IOTC, WCPFC and IATTC reporting requirements). However, the

[19] https://oceanfish.spc.int/en/data-collection/241-data-collection-forms

	facilitate consistent data collection across fleets. To enhance data accuracy and timeliness, the WCPFC has established standards for electronic reporting of operational data. These standards outline the minimum data fields, formats, and validation procedures necessary for electronic submissions with the aim to streamline data collection and improve the efficiency of data management within the Commission.	requirements through observer data rather than logbook data.		ERS reporting obligations include requirements to provide a summary of catch per unit effort (CPUE), and total numbers of seabirds incidentally caught by area and fleet and a summary of seabird captures from sources other than observers. It is therefore likely that CCSBT authorised vessels would require comprehensive operational level reporting to meet these requirements.
Observer data	Observers operating under the Regional Observer Program are required to report in accordance with the WCPFC ROP Minimum Standard Data Fields 2016. This includes specific sections, and corresponding data fields, on: - ‘special gear attributes’ for longline vessels (which includes seabird mitigation gear such as tori lines or weighted branch lines). - ‘species of special interest (SSI)’ data fields (including seabird interaction details (date, time location, nature of interaction), outcome/fate of animal.	Under the regional observer scheme (ROS), data collection forms are tailored for specific gear (e.g. LL). Relevant forms are Form 1DI (Discard Data), Form 1DR (Species presence), and Form 1IN (Interactions with Endangered, Threatened, and Protected (ETP) Species). Form 1IN captures the nature and outcome of ETP interactions. Form 3CN (Catch and Effort Data) would also provide valuable accompanying information. Observers are required to document	Data is collected under domestic observer programs and reported using standardised ST09-NatObProg forms (ST09A, ST09B, ST09C), which capture detailed information on fishing activities, catch composition, and bycatch incidents. The ST09 forms are designed to capture comprehensive data on all fishing operations including SSI/bycatch. Observers must record interactions with SSIs, detailing the species involved, circumstances of the interaction,	CCSBT Scientific Observer Program Standards outline the framework and requirements. Observer data is submitted to the CCSBT as a part of the annual ERSWG Data Exchange process following the agreed templates including interactions with ERS specifications. The ERSWG data exchange obligations include requirements to report on the proportion of observed effort where specific mitigation

	- An 'observer trip monitoring summary' which requires binary reporting on any interactions with SSI (Yes/No). However, the WCPFC ROP Minimum Standard Data Fields relating to seabird mitigation measures do not directly align to the existing seabird mitigation requirements in CMM 2018-03. Observers operating under the Regional Observer Programme are not required to use a particular form, only to meet the reporting requirements under the ROP Minimum Data Fields. Some Pacific Islands Observers use the Gen-3 Form developed by FFA/SPC to meet their reporting requirements[20]: This form has more detailed reporting requirements in relation to seabird interaction and mitigation measures, however, is not designed to align directly to CMM 2018-03 requirements. The Regional Observer Program Intersessional Working Group continues to progress work to strengthen the ROP Minimum Standard Data Fields.	SSI interactions by recording the date, location, species involved, nature of the interaction, and outcome (e.g., released alive, injured, or dead). Interactions should be reported using the designated observer forms and included in submitted trip reports. Observers are required to submit trip reports to the flag CPC within 30 days of trip completion. The CPC is required to forward the reports and associated data to IOTC Secretariat within 150 days, using the standardised templates and formats (e.g. electronically).	and the condition of the animal upon release.	measures were used and the observed and estimated captures/mortalities by species or group. The CCSBT Scientific Observer Program Standards specify comprehensive catch, effort and environmental information that is to be recorded for each set while the observer is on-board a vessel, regardless of whether the set/haul was actually observed, which includes seabird mitigation measures employed. In addition, observers must report the total number, whole weight in kilograms (when possible), and life status of all species caught but discarded during the observed period.

[20] https://oceanfish.spc.int/en/data-collection/241-data-collection-forms.

7. Conclusion

Seabird reporting and mitigation requirements differ between CCSBT-relevant tuna RFMOs. These differences extend to both Member reporting requirements and to operator level requirements. As a result, operator level reporting requirements are largely left to the discretion of each Member and prescribed by each upon consideration of its own suite of national and international obligations. The operator level reporting requirements applied by Members to their vessels differ based on range of factors, including RFMO membership, national bycatch policy decisions bycatch, and national vessel-level regulatory requirements.

Notwithstanding the differences between RFMOs' requirements, CCSBT's ERS annual data exchange and biennial reporting obligations include detailed reporting requirements in relation to seabird interactions. These reporting requirements relate to data sourced both from observers and also other sources. This therefore indicates that Members may need to apply detailed operational level reporting for their vessels operating across each RFMO's area of competence. Further discussion and exploration of each Members' approaches to operational-level reporting would assist the Compliance Committee's consideration of ways to harmonise seabird reporting requirements across relevant RFMOs.

The IMCS Network is an informal, voluntary organization that includes a growing number of members from national and regional fisheries agencies and organizations. The Network also includes observers from intergovernmental organizations (IGOs), non-government organisations (NGOs) and academic institutions that play a key role in strengthening and enhancing responses to IUU fishing and focusing collective monitoring, control and surveillance (MCS) efforts.

The Network promotes and facilitates effective communication, collaboration, coordination, and capacity development for our members and across the broader fisheries MCS, compliance and enforcement community. The IMCS Network Strategic Plan 2024 – 2029 provides a roadmap to guide and strengthen the Network to ensure that we deliver results, add value to the work of our members and work effectively with our observers and partners.

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