



CCSBT–CC/2510/15

Review of Corrective Action Policy (Compliance Policy Guideline 3)

1. Introduction

CCSBT's [Corrective Action Policy](#) (CPG3) sets out a framework for CCSBT to respond to evidence of non-compliance by a Member. The Policy identifies three main sources of non-compliance:

- *administrative failings, including not fully implementing effective systems and processes to support obligations*
- *failure by Members to take action against non-compliance by fishers, farmers, processors, exporters or importers within their jurisdiction*
- *deliberate actions by Members to avoid meeting obligations.*

CPG3 provides its guidance on appropriate corrective actions and responses based on the identified source of non-compliance. However, CPG3's guidelines for corrective actions often lack clear guidance outside of cases that involve catch in excess of allocation. In addition, determining the actual source of non-compliance can require more detailed levels of interrogation than may be available to the Compliance Committee (CC). This is because the source of the non-compliance will often not be able to be clearly identified in the information provided in reporting provided to CC.

CCSBT has a standardised annual compliance assessment process where Members utilise information presented by the Secretariat¹ and from individual Member reports to the CC to assess whether CCSBT obligations are being met. This approach requires accurate self-reporting, thorough assessments from Members of the information presented and a detailed examination to identify the causes of the non-compliance.

CPG3 also notes that 'relevant aggravating factors' should be taken into account when considering corrective actions. The examples of aggravating factors included in the Policy are:

- harm caused to other Members;
- ongoing non-compliance without good cause (including systematic under-reporting or over-catch over multiple years); or
- evidence of intent to avoid CCSBT obligations.

All three of those examples of aggravating factors can be interpreted differently, with terms like harm and ongoing not defined and therefore open to interpretation. Therefore, the

¹ This comes primarily from the Secretariat's "Compliance with Measures" paper presented at CC.

examination of both the causes of non-compliance and the relevant aggravating factors can be open to a greater level of subjectivity, especially when compared with responses to catch in excess of allocation.

To date, most of the non-compliance identified in the CC meetings would fall under what has been termed in CPG3 as “administrative failings”. However, challenges in effectively implementing the responses available in CPG3 have led to ongoing non-compliance in certain administrative areas. Some examples of these administrative areas include the implementation of Catch Documentation Scheme (CDS) Resolution obligations, annual reporting and data exchange submission requirements, and port inspection and transshipment reporting obligations.

2. Background

The [2021 CCSBT Performance Review](#) made a range of recommendations which included to improve the effectiveness of CCSBTs application of punitive and corrective actions² and to strengthen the compliance assessment process, including its decision-making and corrective actions policy³.

During discussions at CC17, Members recognised the limitations of the existing [Corrective Actions Policy](#) (CPG3) to address current compliance issues. From these discussions, the Secretariat was asked to review CPG3 and propose new tools that can be added to the policy to incentivise better compliance amongst Members for consideration at CC18.

At CC18, the Secretariat presented paper [CCSBT-CC/2310/10](#) which noted that, CPG3 lacked clear guidance, particularly in the case of persistent “administrative failings”, which represented the overwhelming majority of non-compliance identified in the meetings of the CC. The paper noted that the existing CPG3 provides several corrective actions that already provide flexibility to the CC in determining how best to address the individual circumstances of the detected non-compliance, however, more specific references to defined responses to non-compliance (beyond just catches in excess of allocation) may also support more effective implementation of the policy.

The paper identified some additional mechanisms that could be considered by Members, such as potentially expanding the application of allocation-based punitive measures (e.g. Members’ eligibility to apply the Carry-Forward Resolution), using targeted QARs where persistent non-compliance is identified, enhancing the visibility of compliance performance on CCSBT’s website, and changing the decision-making process. During discussions at CC18, the following points were raised by Members:

- the concept of persistent non-compliance was currently not well defined in the CCSBT context;

² Recommendation PR2021-43.

³ Recommendation PR2021-47.

- the importance of unanimous decision-making to ensure that the non-compliant Member agrees with the corrective action;
- some Members felt that having a pre-agreed set of responses to compliance issues could be a useful model since the consequences of being non-compliant would be known in advance; and
- the purpose of CPG3 was understood to be to assist Members to comply and that adding further punitive measures could, in some circumstances, increase non-compliance.

CC18 recognised that more substantive in-person discussions may be required, and it was agreed to re-visit CPG3 at CC19 in 2024.

At CC19, the Secretariat presented paper [CCSBT-CC/2410/10](#), which built on previous discussions and identified two key areas of CPG3 where there were opportunities to provide further clarity to assist in the effective implementation of CPG3. These two areas related to the lack of guidance on:

- the process required to target, develop, monitor and update these capacity building programmes.
- what should happen after ‘the first instance’ (where non-compliance is not addressed or is more enduring), how this is reported to the Compliance Committee, and how the agreed programme should be developed where Members may find it difficult to engage.

In relation to the first bullet point, the Secretariat noted the importance of the [Capacity Building Workplan](#) in providing a defined process to target, design and evaluate capacity building activities. This workplan was later endorsed by CCSBT31.

During intersessional engagement coordinated by the Secretariat before CC19, the Members that responded⁴ agreed that defining ongoing or persistent non-compliance would be beneficial but noted that this also required greater definition of the types of non-compliance, the degree of non-compliance and the risk created by the non-compliance. During the discussions at [CC19](#), Members also noted the influence that resourcing and budget pressures within Member administrations can have on the level of Member compliance. In progressing the review of CPG3, CC19 noted the following:

- 51. The meeting suggested a review of reporting obligations to ensure that these were not creating an unreasonable burden on Member administrations.*
- 52. Members also noted that although circumstances surrounding non-compliance are often unique, there would be benefit in finding agreement on what constitutes more serious cases of non-compliance and developing an agreed response mechanism in those cases. The group supported the use of an intersessional process to initiate this discussion.*

⁴ Australia, New Zealand, Korea and Taiwan

CC19 further agreed to the Secretariat leading an intersessional process to further develop CPG3 to inform CC decisions on appropriate corrective actions.

3. Intersessional Engagement with Members Prior to CC20

To build on the previous discussions, and to respond to the requests made at CC19, the Secretariat undertook further intersessional engagement with Members prior to CC20. To support Members consideration of CCSBT reporting obligations in terms of burden and the seriousness of non-compliance, the Secretariat compiled a table that listed all Member reporting obligations and how compliance was currently being assessed and reported to CC. This also enabled Members to assess the types of non-compliance. This table is included as **Attachment A** to this paper and has been updated to reflect responses from Members on which may be considered serious non-compliance. To support Members consideration on seriousness and risk, the Secretariat also included in the table an initial assessment of what may constitute serious non-compliance. This assessment was based on the agreed compliance risks that informed the development of the Compliance Action Plan. When considered against the agreed CCSBT compliance risks, the following obligations were identified as potential candidates for considering non-compliance and more serious:

- Reporting commercially caught/retained mortality
- Members reporting in annual reports of *Catch and allocation, Allowances and SBT mortality for each sector and SBT Catch (retained and non-retained)*; and
- Timely submission of complete Member annual reports.

Four Members⁵, responded to request for Member input to the intersessional engagement. In these responses, no Members identified specific obligations that were creating an unreasonable burden on Member administrations. However, in its response, Indonesia did highlight some challenges that it had in meeting some reporting obligations. The challenges identified by Indonesia in its response included:

- coordination with different ministries and stakeholders;
- additional funding requirements to assign dedicated officers to conduct data collection across all fishery sectors;
- securing sufficient national budget to sustain this level of monitoring;
- the need for more technical assistance particularly related to the ERS measures, observer coverage, and fishing logbook; and
- securing budget for additional monitoring measures, such as the deployment of cameras on small boats.

The Member responses related to obligations where non-compliance could be viewed as more serious are summarised below.

⁵ Australia, Indonesia, New Zealand and Taiwan.

3.1. Australia

Australia did not provide comment on individual obligations, but provided the following general comments:

- Failing to comply with mandatory obligations in CCSBT Resolutions should constitute more serious non-compliance in contrast to those requirements not yet formalised in CCSBT Resolutions.
- Risk Ratings of the attached document provide a preliminary indication of which Reporting Obligations would constitute serious non-compliance.
- Data fields requiring **Validation** and specifically data fields recording quantity of SBT caught/landed/re-exported, should be treated as more significant example of non-compliance (i.e. serious non-compliance) than “incomplete or inaccurate information” in data fields that are not subject to validation or administrative data fields only.
- Defining Reporting Obligations as Serious non-compliance should consider whether a Member’s non-compliance has been repeated over multiple seasons consistent with Compliance Schemes used in other RFMO’s.

3.2. Indonesia

Indonesia provided responses to all reporting obligations and did not identify any obligations where non-compliance should be viewed as ‘serious’. Indonesia offered the following explanations in relation to the three obligations identified by the Secretariat where, based on the agreed CCSBT compliance risks, non-compliance may potentially be viewed as serious:

- *Reporting commercially caught/retained mortality* – Indonesia noted difficulties in providing a clear position due to the lack of clarity on the definition of “commercial,” particularly for SBT landed by artisanal fisheries. The treatment of artisanal fisheries cannot be fully aligned with industrial fisheries, especially with regard to tagging and CDS requirements. Data from artisanal catches rely heavily on enumerators’ records at landing sites, which presents its own challenges. Therefore, Indonesia could not agree such failure is considered as serious non-compliance.
- *Members reporting in annual reports on Catch and allocation, Allowances, and SBT mortality for each sector as well as SBT Catch (retained and non-retained)* – Indonesia does not agree that failure to comply with this obligation should be categorized as serious non-compliance. As this obligation relates to data collection, and given that each country has different national characteristics, Indonesia believes that developing Members should be provided with support in the form of capacity building and the implementation of a corrective action plan to improve data monitoring systems, particularly for artisanal and recreational fisheries.
- *Submission of complete Member annual reports* – Indonesia does not agree that failure to submit a complete annual report should be categorized as serious non-compliance. Preparing a complete annual report requires coordination with various relevant institutions, which demands significant time and effort.

3.3. New Zealand

New Zealand provided responses against those obligations that is viewed non-compliance as potentially more serious and:

- Agreed that failing to provide commercially caught/retained mortality was serious non-compliance
- Recommended that reporting release/discard/other sources of mortality should be serious non-compliance.
- Agreed that Members failing to accurately report in their annual reports its catch and allocation, allowances and SBT mortality for each sector and SBT Catch (retained and non-retained) was serious non-compliance.
- Highlighted the importance of reporting of initial allocations by vessel/company as demonstrating flag State control.
- Agreed that Members failing to provide complete annual reports four weeks prior to CC was serious non-compliance.
- Highlighted that emphasis in the annual reports should be placed on progress on actions taken to rectify any non-compliance.
- Believed that failing to report transshipment activities should be considered serious non-compliance and that at sea transshipments should be authorised and be an exception to the rule, not the norm. NZ felt that transshipment should only occur where full monitoring and control was in place.
- Believed that the seriousness of non-compliance with the CDS Resolution may depend on non-compliance levels and that the eCDS implementation should help refine reporting and improve compliance.
- Highlighted the burden placed on exporting Members to assist importing Members to identify consignees for exports.
- Suggested that the Secretariat could consider sending reconciliation reports not at the same time as domestic reconciliation processes, to help reduce administrative burden- for example, compiling and sending all Q1 & Q2 errors mid-year, and Q3 & Q4 errors at end of year.
- Suggested that non-compliance with reporting Fishing Vessel authorisations and ensuring that they cover all catch/harvest days should be escalated where there are significant/ongoing delays.

3.4. Taiwan

Taiwan noted that many irregularities identified in CDS reports might not pose significant risks but highlighted a concern about possible counterfeiting of eCDS forms.

4. Discussion on Key CPG3 Implementation Concerns

The Secretariat has identified some key implementation concerns that have been raised in discussions and feedback to date.

4.1. Reporting Obligations Creating an Unreasonable Burden on Member Administrations

As noted in Section 3, no Member that responded as part of the intersessional engagement identified any specific obligations as creating an unreasonable burden on Member administrations. Indonesia did highlight some challenges it faces in meeting some specific

obligations, however, it is suggested that these may not be the result of an unreasonable burden on the administration. CPG3 notes that in considering non-compliance CC may consider any remedies suggested by the Member. The Policy also states that “the Member will be provided with an opportunity to suggest corrective actions or remedies to improve their compliance with CCSBT obligations”. It is therefore suggested that where these factors contribute to any identified non-compliance, they should be raised by the Member and especially as they relate to any suggested corrective actions or remedies. CC20 may wish to further discuss the CCSBT reporting obligations in relation to the burden that these obligation place on Member administrations.

4.2. Defining Ongoing Non-Compliance

CPG3 includes “*ongoing non-compliance without good cause*” as an aggravating factor for the Compliance Committee to consider when recommending the appropriate corrective actions to the Commission. All Members that responded to the intersessional consultation conducted in 2024 indicated that more clearly defining this would support the implementation of CPG3. However, most responses also indicated that further information or clarification was required to ensure this was applied effectively. The current language used in CPG3, including the words “*without good cause*” reflects an intent for the Compliance Committee to consider why the non-compliance had occurred or is occurring, rather than intending an arbitrary application of a penalty based solely on the time over which the non-compliance has occurred.

Australia’s response to the intersessional engagement again noted the need to consider whether a Member’s non-compliance had been repeated over multiple seasons when assessing the seriousness of non-compliance. Australia further noted that this approach was consistent with compliance schemes used in other RFMOs. CC19 agreed that the compliance issues from the preceding CC meeting that are compiled in a letter to each Member would be included in the attachment to the Compliance with Measures paper ([CCSBT-CC/2510/04](#)). This will support the CC in assessing the compliance issues discussed in the preceding CC meeting with those identified and discussed at CC20. However, CC20 may also wish to consider if further defining and agreeing what may be considered ‘ongoing’ non-compliance would assist in more effectively identifying and implementing corrective action in these cases. CC20 may also wish to use the table provided by the Secretariat to support the intersessional engagement to consider if there are obligations where including other previous years compliance assessments would support CC in assessing the seriousness of the non-compliance.

4.3. The Process for Requiring, Developing, Monitoring, Reporting and Assessing/Updating Capacity Building Programmes

CPG3 states that “*corrective actions for administrative failings by a developing country Member should focus on capacity building programmes, provided this is effectively targeted at correcting the deficiencies*”. However, there is currently very little guidance included in CPG3 on the process required to develop, monitor and update these capacity

building programmes. The Capacity Building Workplan was identified by the Secretariat as an important tool to provide greater clarity around how capacity building programmes are considered, developed and monitored and that they align with the broader CCSBT capacity building approach.

This is the first year that the Capacity Building Workplan has been considered and implemented at CC. Some specific areas of non-compliance and related capacity building actions from the Compliance Action Plan were identified for CC20 to consider in paper [CCSBT-CC/2510/07](#). CC20 may wish to consider if there are opportunities to further align the application of the Capacity Building Workplan and Corrective Actions Policy.

4.4. Understanding the Risk Associated with Failing to Meet Specific Obligations

In response to the intersessional consultation during 2024, Members indicated that CPG3 implementation could be supported by providing greater clarity on the types of administrative failings and the associated risk created by the non-compliance. Australia noted in its response to the intersessional engagement that risk ratings provide a preliminary indication of which reporting obligations would constitute serious non-compliance. The Secretariat has incorporated the agreed CCSBT compliance risks in its initial assessment of what may be considered “serious non-compliance”. CC20 may wish to consider if further examination of the risk associated⁶ with specific obligations (or similar groups of obligations) can further help inform the CC consideration of appropriate action.

The Secretariat further suggests that if Members were to agree to specific obligations where non-compliance may be identified as ‘serious non-compliance’, this does not need to limit the range of responses available to CC. Instead, this could be used to ensure that this non-compliance is prioritised for further discussion and consideration by CC to ensure that appropriate responses are developed (including capability building, where this may address the cause of the non-compliance). As noted in [CCSBT-CC/2410/10](#), consistent with bullet point two under section 5.5 of CPG3, this work could also consider any ‘non-trivial instances of non-compliance with CCSBT obligations’ that also could be maintained on the public side of the CCSBT website⁷.

4.5. Secretariat Reporting to the Compliance Committee

The table compiled by the Secretariat to support the intersessional engagement also included a column that listed how the Secretariat assessed and reported Members compliance with each obligation. It is important that the reporting to CC provides all the information needed to

⁶ This should build on the work to date to define the agreed risks that have informed the Compliance Action Plan development.

⁷ This was also discussed at CC18 in paper [CCSBT-CC/2310/10](#) which noted that ‘there is a comprehensive record of compliance with administrative requirements currently available in Attachment A of the Secretariat’s “Compliance with Measures” paper. Although this paper is publicly available on the CCSBT website, Members may want to extract key performance measures from the tables of Attachment A and present this information on the CCSBT website’.

support the assessment of any non-compliance and inform discussions on the appropriate corrective action. Many of the current information fields reported to CC in the attachments to the Compliance with Measures fields have been reported since the CDS was first implemented. It is also suggested that some fields that are included in the Compliance with Measures reporting, such as whether compliant CMFs were used, may have been more appropriate during the initial implementation of the CDS. The eCDS implementation will require a reassessment of the Secretariat's reporting, especially as some analysis will no longer be relevant (such as the use of compliance forms due to forms being pre-defined within the eCDS).

Noting that successive CCSBT Compliance Plans have included the goal of full compliance with CCSBT measures, it is important that continue to consider all relevant areas of compliance. It is therefore recommended that CC20 consider the current reporting to CC to ensure that it supports the identification of non-compliance and the effective implementation of corrective actions.

5. Conclusion and Next Steps

The draft Compliance Action Plan includes two relevant actions for Members to:

- consider strengthening corrective actions policies⁸; and
- 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 Secretariat⁹.

Both actions are currently scheduled to be progressed through 2025 and 2026 and precede the further action in 2026, 2027 and 2028 to:

Introduce relevant punitive measures as part of a more comprehensive
Corrective Actions approach (review of Corrective Actions Policy).

It is therefore important that CC20 discuss and consider opportunities to ensure tangible progress can be made against these actions to ensure that they remain on target.

The Secretariat invites CC20 to:

- Discuss and consider the information presented in this paper and the results of the intersessional consultation with Members;
- Note the range of corrective actions already available to Members under CPG3;
- Discuss the implementation of the capacity building needs assessment at CC20 and consider if there are opportunities for this to better support the implementation of the Corrective Actions Policy;

⁸ This action is assigned to Members and seeks to address the risk of "incomplete reporting of SBT mortalities".

⁹ This action is assigned to Members and the Secretariat and seeks to address the risk of "lack of systematic follow-up actions to address non-compliance leading to persistent non-compliance".

- Consider opportunities to further integrate the risk presented by non-compliance into the assessment of appropriate corrective actions;
- Recommend any changes or additions to current reporting to the CC to ensure that Members have all the information required to effectively assess compliance, including the seriousness of any non-compliance identified;
- Discuss whether defining ‘ongoing non-compliance’ is necessary to support the implementation of the Corrective Actions Policy; and
- Consider convening a virtual Technical Compliance Working Group to assist in progressing the review of Corrective Actions Policy.

Prepared by the Secretariat



Attachment A

Intersessional Member Consultation to Further Inform the CPG3 Review

Following Member discussions on the review of CPG3 at CC19, there were two main elements noted in the report to be progressed intersessionally. These were noted in Paragraphs 51 and 52 of the [CC19 report](#):

- 51. The meeting suggested a review of reporting obligations to ensure that these were not creating an unreasonable burden on Member administrations.*
- 52. Members also noted that although circumstances surrounding non-compliance are often unique, there would be benefit in finding agreement on what constitutes more serious cases of non-compliance and developing an agreed response mechanism in those cases. The group supported the use of an intersessional process to initiate this discussion.*

In order to support Member's consideration of CCSBT reporting obligations (paragraph 51), the Secretariat has compiled a table below that lists all Member CCSBT reporting obligations. We request that Members add any comments to this table against obligations that it feels may be creating an unreasonable burden on Member administrations.

In beginning to assess what is 'serious non-compliance', it is important that Members are provided with the opportunity to also consider how compliance is currently being assessed and reported to the Compliance Committee (what any assessment by the CC would be based on). So, under each reporting obligation, the Secretariat has added a column that includes where compliance is currently assessed (in which paper and section) and how it is reported (what is measured and the measurements used). This is intended to provide Members with the information from which to start to assess which measures of compliance against which it views non-compliance as 'serious'. It is recommended that Members not be restricted by what is currently reported or measured in compliance reporting but also consider if any other important compliance related areas are not currently being reported against. This will also help the Secretariat ensure that it is providing to Members all the information needed to support Members' assessment, at Compliance Committee, of any non-compliance and the appropriate corrective action required.

The Secretariat has included an initial indication of some measures of compliance, against which non-compliance may be viewed as 'serious'. This is based on the risk assessment associated with the agreed risks that were used to inform the Compliance Action Plan development. We welcome Members adding to the table indications of categories it views as serious non-compliance and any associated comments related to this.

It is recognised that for some measures, the extent of the non-compliance will impact any assessment of the seriousness of the non-compliance (e.g. the percentage of non-compliant CDS forms or data provided/not provided). The Secretariat believes that any assessment based on the degree or scale of non-compliance is an important task completed by the Compliance Committee. But we welcome Members' thoughts on whether there may be guidance that can be provided to the Compliance Committee when assessing specific categories of non-compliance. In this regard, please also indicate this in the comments section of the table.

We thank Members for their time and input to this discussion. Your feedback is important and will form the basis for further in-person discussion at CC20 later this year.

CCSBT Agreed Compliance Risks and Risk Scores

These risks have been used to inform the initial suggested areas of ‘serious non-compliance’ for Member consideration.

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

Reporting Obligation	Where Compliance is Assessed and How it is Reported	Serious non-compliance?	Member Comment	Secretariat Comment
Catch/Allocation Reporting	Paper: Compliance with Measures - Attachment A and Member Annual Reports			Associated Compliance Risk: Incomplete reporting of SBT mortalities Risk Matrix Score: High
- All fishing-related SBT mortality is reported annually to the Extended Scientific Committee, for incorporation into stock assessment analysis, and to the Commission. - 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)			Associated Compliance Risk: Not fully attributing all SBT mortalities (such as recreational catch, artisanal catches, discards, farm sector catches, non-farm commercial sector catches) against national allocations. Risk Matrix Score: Low Reporting of mortalities is central to assessing catch against allocation and to the management of the stock. The importance of this is reflected in the agreed risk score assigned to incomplete reporting of SBT mortalities. SBT catch is reported across a number of mechanisms. The Secretariat has suggested non-compliance against two key SBT catch reporting mechanisms as serious, but we welcome Member thoughts across the breadth or CCSBT catch reporting.
	Commercially caught/retained mortality <i>Reported as whether or not this was provided (✓, F, P or X), no quantities given in the attachment.</i>		NZ - Agree serious non-compliance. Reliant on accurate Daily Catch and Effort Records. ID - Indonesia noted the lack of clarity on a definition of "commercial," particularly for SBT landed by artisanal fisheries, stating that the treatment of artisanal fisheries cannot be fully aligned with industrial fisheries, especially with regard to tagging and CDS requirements. Data from artisanal catches rely heavily on enumerators' records at landing sites, which presents its own challenges. Therefore, Indonesia could not agree such failure is	

Reporting Obligation	Where Compliance is Assessed and How it is Reported	Serious non-compliance?	Member Comment	Secretariat Comment
			considered as serious non-compliance.	Current Secretariat reporting focusses more on whether the data has been provided than the reported quantities. We welcome Members assessment of the seriousness of non-compliance with reporting all forms of mortality, monthly reporting and reporting of quota allocation and catch against allocation. Members may also wish to consider if the current reporting can be improved to ensure it provides the Membership with the visibility needed to monitor compliance in this area.
	Release/discard/other sources of mortality. <i>Reported as whether or not this was provided (✓, F, P or X) and the quantity provided in Member reporting.</i>		NZ – Believed non-compliance should be viewed as serious. It noted its ongoing interest and concern where members are reporting no or n/a other sources of mortality but report targeting SBT. ID – Not serious. Reports from trained observers provide the most reliable source of data, followed by logbooks. However, small-boat fisheries often record only retained catch, and misidentification of species may occur.	
	Recreational mortality <i>Reported as whether or not this was provided (✓, F, P or X) and the quantity provided in Member reporting.</i>		ID – Not serious. Recreational fishing, which falls under tourism and sport fishing activities, may require additional reporting and coordination with different ministries and stakeholders, creating an added	

Reporting Obligation	Where Compliance is Assessed and How it is Reported	Serious non-compliance?	Member Comment	Secretariat Comment
			administrative burden as well as labour cost.	
	Customary or artisanal mortality <i>Reported as whether or not this was provided (✓, F, P or X) and the quantity provided in Member reporting.</i>		ID – Not serious. Artisanal fishers operating from small boats may land their catches at non-designated fishing ports. Voluntary reporting by fishers is often incomplete, and assigning dedicated officers to conduct data collection would require additional funding.	
	Scientific Data Exchange ○ Total Catch by Fleet ○ Catch and Effort <i>Reported as whether or not this was provided (✓, F, P or X), no quantities given in the attachment.</i>		ID – Not serious.	
	Member Annual Reports Members are required to report against: <i>Catch and allocation</i> <i>Allowances and SBT mortality for each sector</i> <i>SBT Catch (retained and non-retained)</i>		NZ - Agree serious non-compliance, but fundamental requirement for CCSBT members. ID –does not agree that failure to comply with this obligation should be categorized as serious non-compliance. As this obligation relates to data collection, and given that each country has different	

Reporting Obligation	Where Compliance is Assessed and How it is Reported	Serious non-compliance?	Member Comment	Secretariat Comment
			national characteristics, Indonesia believes that developing Members should be provided with support in the form of capacity building and the implementation of a corrective action plan to improve data monitoring systems, particularly for artisanal and recreational fisheries.	
- Monthly Catch Reporting - 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 <i>Reported as whether or not monthly reports have been provided on time, no quantities given in the attachment.</i>		ID – Yes serious but proposed to adjust the deadline, not limited to the last day of the month of following fishing but the next following month (2 months after the last day of fishing season).	
- Reporting of initial allocations by vessel/company - 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 <i>Reported as whether or not initial allocation were provided on time, no quantities given in the attachment.</i>		NZ – Regardless of catches, this information should be provided by all CCSBT members in the lead up to the fishing year and it demonstrates flag state control. ID – Not Serious. Implementable but prone to report it beyond the deadline due to latest adjustment in	

Reporting Obligation	Where Compliance is Assessed and How it is Reported	Serious non-compliance?	Member Comment	Secretariat Comment
			distribution mechanism in Indonesia.	
- Reporting of final catch by vessel/company: - 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 (<i>due between xx/xx/xx & xx/xx/xx</i>) Final Catch by Vessel <i>Reported as whether or not final catch was provided on time, no quantities given in the attachment.</i>		ID – Not Serious. Implementable but prone to report it beyond the deadline due to latest adjustment in distribution mechanism in Indonesia.	
Member Annual Reports	Paper: Compliance with Measures - Attachment A			Associated Compliance Risk: CCSBT Members not fully <i>implementing</i> specific Conservation and Management Measures (CMM's) as agreed, particularly the binding ERS measures of IOTC, ICCAT and WCPFC. Risk Matrix Score: Low.
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 information:	xxxx Members' Reports: Is all information required by Templates provided <i>A single assessment of the entire Member report and if all information has been provided across all requirements.</i>		NZ - Agree serious non-compliance. ID - Indonesia does not agree that failure to submit a complete annual report should be categorized as serious non-compliance. Preparing a complete annual report requires coordination with various relevant	Associated Compliance Risk: CCSBT Members not fully <i>complying with the obligations</i> of specific Conservation and

Reporting Obligation	Where Compliance is Assessed and How it is Reported	Serious non-compliance?	Member Comment	Secretariat Comment
			institutions, which demands significant time and effort.	Management Measures (CMM's) as agreed, particularly the binding ERS measures of IOTC, ICCAT and WCPFC.
- 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			NZ - Emphasis should be placed on progress with actions taken to rectify any non-compliances. ID – Not serious. Highlighted need for more technical assistance, particularly related to the ERS measures, observer coverage, and fishing logbook.	Risk Matrix Score: High. Noting that Member reports are one of the primary mechanisms through which the Compliance Committee assesses CCSBT Members <i>complying with the obligations</i>, and that this risk has been assessed as high, the non-provision of the annual reports has been suggested as serious non-compliance.
- SBT Fishing and MCS - Fishing for Southern Bluefin Tuna - Monitoring catch of SBT - SBT Towing and transfer to and between farms (farms only) - SBT transshipment (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	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		ID – Not serious.	At present the Secretariat provides an overall assessment of Member's annual reports received in the preceding year, but this does not report on each (or key) sections of the report. Annual reports are an important tool for assessing and monitoring compliance with CCSBT obligations, especially in areas where the reports provide the only insight into implementation (an example being Member reporting of VMS implementation).
	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)		ID – Not serious.	

Reporting Obligation	Where Compliance is Assessed and How it is Reported	Serious non-compliance?	Member Comment	Secretariat Comment
	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			We welcome Members thoughts on the importance of the information reported in different sections of the annual reports. This will also assist the Secretariat in focussing its analysis and reporting on those areas of most concern to Members.
	2.4 SBT transshipment (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.		NZ - Should be considered as serious non-compliance. At sea transhipments should be authorised and be an exception to the rule, not the norm. Should only occur where full monitoring and control is in place. ID – Not serious.	
	2.5 Port Inspections of Foreign Fishing Vessels/Carrier Vessels (FVs/CVs) with SBT/SBT Products on Board The number of landing/ transshipment operations that foreign FVs/CVs carrying SBT or SBT product made in port. The number of those landing/ transshipment operations that were inspected. The number of inspections where infringements of CCSBT's measures were detected.		ID – Not serious.	
	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.		ID – Not serious.	

Reporting Obligation	Where Compliance is Assessed and How it is Reported	Serious non-compliance?	Member Comment	Secretariat Comment
	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.		ID – Not serious.	
• 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 Transshipment (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			ID – Not serious.	

Reporting Obligation	Where Compliance is Assessed and How it is Reported	Serious non-compliance?	Member Comment	Secretariat Comment
○ Additional Reporting Requirements Ecologically Related Species				
Catch Documentation Scheme	Paper: Compliance with Measures - Attachment A			Associated Compliance Risk: Non-compliance with the (e)CDS or incorrect information in (e)CDS documents. Risk Matrix Score: Low/Medium.
• Data Submission ○ Provide all completed Catch Tagging Form information in an electronic format on a quarterly basis. ○ Provide copies of all completed CDS documents on a quarterly basis.	Catching Member CMFs submitted within required timeframe <i>Reported as whether CMFs were provided on time (✓, F, P or X).</i>			Associated Compliance Risk: Incomplete implementation or submission of (e)CDS data including Non-Members not cooperating with the CDS Resolution Risk Matrix Score: Low/Medium. Because both associated compliance risks have been assessed as low/medium, no CDS related obligations have been suggested as serious non-compliance at this stage. With regards non-compliance with the CDS obligations, the seriousness of the non-compliance can also be dependent on the level of non-compliance (e.g. what percentage of CMFs contain complete and accurate information).
	Were compliant CMFs used? <i>Reported as whether CMFs were all compliant (✓, F, P or X).</i>		NZ – Agree with Secretariat’s comments, seriousness may depend on non-compliance levels, and eCDS implementation should help refine reporting and improve compliance. ID – Not serious.	
	% of CMFs for Domestic Landings that contain complete and accurate information <i>Reported as a percentage.</i>		ID – Not serious.	
	% of CMFs for Exports that contain complete and accurate information <i>Reported as a percentage.</i>		ID – Not serious.	
	% of CMFs for Domestic Landings with valid authorised vessels <i>Reported as a percentage with the number of CMFs listing an unauthorised vessel are shown in brackets.</i>		ID – Not serious.	

Reporting Obligation	Where Compliance is Assessed and How it is Reported	Serious non-compliance?	Member Comment	Secretariat Comment
	% of CMFs for Exports with valid authorised vessels <i>Reported as a percentage with the number of CMFs listing an unauthorised vessel are shown in brackets.</i>		ID – Not serious.	The Secretariat currently assesses compliance across a number of different areas related to CDS documents submitted by Members in the preceding year. We welcome Members thoughts on the areas of CDS implementation where non-compliance would be viewed as most serious (recognising that there can be more nuance to this). In considering this, Members should not be limited to the current areas assessed by the Secretariat but may wish to also consider any other areas that may not be a focus of current Secretariat reporting. Members may also wish to consider if the Secretariat reporting should be further refined as Member compliance increases to continue to encourage greater levels of compliance. It is also likely that the Secretariat reporting will require further review in light of the eCDS implementation. As an example, the Secretariat
	% of CMFs for Domestic Landings where the catch/harvest weight differs from the landed weight by <= 5% <i>Reported as a percentage.</i>		ID – Not serious.	
	% of CMFs for Exports where catch/harvest <u>weights</u> are the same on both exporter and importer copies. <i>Reported as a percentage.</i>		ID – Not serious.	
	% of CMFs for Exports where SBT catch/harvest <u>numbers</u> are the same on both exporter and importer copies <i>Reported as a percentage.</i>		ID – Not serious.	
	% of CMFs with all correctly corresponding CTFs (where required) <i>Reported as a percentage.</i>		ID – Not serious.	
	% of CTFs where fish numbers exactly match CMF <i>Reported as a percentage.</i>		ID – Not serious.	
	% of CTFs where fish weights within 5% of CMF <i>Reported as a percentage.</i>		ID – Not serious.	
	% of expected Export CMFs submitted to the Secretariat <i>Reported as a percentage.</i>		ID – Not serious.	

Reporting Obligation	Where Compliance is Assessed and How it is Reported	Serious non-compliance?	Member Comment	Secretariat Comment
	% of expected import copies of CMFs submitted to the Secretariat by the importing Member <i>Reported as a percentage with the number missing is shown in brackets.</i>		NZ - Assisting the importing Member in identifying consignees for exports from NZ can be burdensome, when multiple forms are involved, but this is expected to be reduced with the implementation of the eCDS. ID – Not serious.	continues to report on whether ‘compliant CMFs’ were used. But this may not be as high a risk given the stage that Members are at with the implementation of the CDS. The risk of this error will also be impacted significantly by the implementation of the eCDS where, except in limited and specific circumstances, forms will be accessed within the eCDS tool.
	% of expected (re-)export REEFs submitted to the Secretariat by the (re-)exporter <i>Reported as a percentage with the number missing is shown in brackets.</i>		ID – Not serious.	
	% of expected import copies of REEFs submitted to the Secretariat by the intended importing Member <i>Reported as a percentage with the number missing is shown in brackets.</i>		ID – Not serious.	
	Number of Duplicate Tag Numbers Submitted in Tagging Data <i>Reported as number.</i>		ID – Not serious.	
○ Review information and investigate and resolve any irregularities identified in their information in the CDS reports, including any discrepancies identified during the comparison of data from the Executive Secretary.	Has the Member responded to the issues identified in the Secretariat’s 2024 final reconciliation report yet? <i>Reported as an assessment of whether or not the Member has responded (✓, F, P or X).</i>		NZ - The Secretariat could consider sending reconciliation reports not at the same time as domestic reconciliation processes, to help reduce administrative burden- for example, compiling and sending all Q1	

Reporting Obligation	Where Compliance is Assessed and How it is Reported	Serious non-compliance?	Member Comment	Secretariat Comment
			& Q2 errors mid-year, and Q3 & Q4 errors at end of year. TW - While many irregularities identified in CDS reports might not pose significant risks, we concern about the possibilities of counterfeiting eCDS forms. ID – Not serious.	
- Validators - Members, Cooperating Non-Members and OSECs who utilise delegated person/s shall submit a certified copy of such delegation/s to the Executive Secretary			ID – Not serious.	
- Prior to officials and persons exercising the authority, provide information on validation including: - type of validation; - name of the organization which validates the documents;	CMFs submitted where Validators were correctly authorised to validate <i>Reported as a percentage with the number of CMFs with an unauthorised validator is in brackets)/ CMFs were validated correctly.</i>		ID – Not serious.	

Reporting Obligation	Where Compliance is Assessed and How it is Reported	Serious non-compliance?	Member Comment	Secretariat Comment
▪ title and name and signature of officials who validate the documents; ▪ sample impression of stamp or seal; and ▪ a list of all persons holding delegated authority to validate CCSBT CDS documentation.	% of REEFs submitted where Validators were correctly authorised to validate <i>Reported as a percentage with the number of REEFs where validators were not correctly authorised are shown in brackets.</i>		ID – Not serious.	
○ Provide any changes to validation information in a timely fashion.				
Transshipment Monitoring	Paper: Compliance with Measures - Attachment A and Operation of CCSBT Measures			Associated Compliance Risk: Non-compliance associated with transshipment obligations (both in port and at-sea) Risk Matrix Score: Medium.
• Submission to the CCSBT Secretariat of all required transshipment observer programme information relating to: ○ Observer designation: including the observer details and evidence to demonstrate sufficient experience and knowledge of CCSBT conservation and			NZ – At sea transshipment is considered a higher risk activity in terms of compliance and should be considered as an exception to the rule. Transshipment should not be undertaken unless effective measures are in place to ensure that	Associated Compliance Risk: Incomplete submission of transshipment information including transshipment information for non-Member flagged vessels. Risk Matrix Score: Low/Medium.

Reporting Obligation	Where Compliance is Assessed and How it is Reported	Serious non-compliance?	Member Comment	Secretariat Comment
management measures, species identification and fishing gear and the ability to observe, record, report and verify carrier and fishing vessel transfers and SBT onboard; and			monitoring is properly conducted. ID – Not serious.	Because both associated compliance risks have been assessed as medium or low/medium, no transshipment related obligations have been suggested as serious non-compliance at this stage. We welcome Members thoughts on this and if the risk ratings remain accurate. Similar to the CDS obligations, the seriousness of the non-compliance with transshipment obligations can also be dependent on the level of non-compliance (e.g. what percentage of required transshipment documents have been provided to the Secretariat). The submission of data is reported by the Secretariat in the Compliance with Measures paper, with more general comment on programme implementation provided in the Operation of Measures paper. Observer designation is managed through the ROP providers in most cases, except in the case of Indonesia's trial transshipment programme using national observers.
○ Observer deployment: including 5-day reports, transshipment declarations and observer reports, and any other required notifications, reports and revisions thereof.	CwM Attachment A: Deployment Requests received <i>Reported as an assessment of whether or not the Member has provided the deployment requests (✓, F, P or X).</i>		ID – Not serious.	
	Transshipment Declarations received for transshipments at sea <i>Reported as an assessment of whether or not the Member has provided the transshipment declarations (✓, F, P or X).</i>		ID – Not serious.	
	Transshipment Declarations received for known transshipments in port <i>Reported as an assessment of whether or not the Member has provided the transshipment declarations (✓, F, P or X).</i>		ID – Not serious.	
	Carrier vessel authorised on transshipment date <i>Reported as an assessment of whether or not all CVs were authorised on the date of the transshipment (✓, F, P or X).</i>		ID – Not serious.	
	Fishing Vessel authorised on transshipment date		ID – Not serious.	

Reporting Obligation	Where Compliance is Assessed and How it is Reported	Serious non-compliance?	Member Comment	Secretariat Comment
	<i>Reported as an assessment of whether or not all CVs were authorised on the date of the transhipment (✓, F, P or X).</i>			The Secretariat welcomes Members thoughts on those transhipment related obligations where members view non-compliance as a serious issue, both in those areas currently reported by the Secretariat, and in any additional areas identified by the Member.
	Operation of CCSBT Measures Transhipment Monitoring Program: General and Operational Issues <i>General discussion and outline of issues in the previous year being reported against.</i>		ID – Not serious.	
Minimum Standards for Port Inspection	Paper: Operation of CCSBT Measures			Associated Compliance Risk: CCSBT Members not fully complying with the obligations of specific Conservation and Management Measures (CMM's) as agreed, particularly the binding ERS measures of IOTC, ICCAT and WCPFC. Risk Matrix Score: High.
Submit a designated point of contact for receiving port entry requests, a designated point of contact for the receipt of inspection reports and a list of designated ports to which foreign FVs/CVs may request entry and submit any updates to these at least 14 days before any changes take effect.			ID – Not serious.	Although this has an associated compliance risk which has been assessed as high, no obligations have been suggested as 'serious non-compliance' because, while the provision of inspection reports helps report on non-compliance with measures, the non-provision of inspection
Submit each completed inspection report to the CCSBT Secretariat no later than 14 days after the inspection completion date(s) and notify the CCSBT Secretariat if an inspection report cannot be provided to the	Summary of XXXX Port Inspection Reports Required/Submitted <i>Reported as a table and general discussion on whether the percentage of inspections was completed by the Member and if all inspection reports were received.</i>		ID – Not serious.	

Reporting Obligation	Where Compliance is Assessed and How it is Reported	Serious non-compliance?	Member Comment	Secretariat Comment
Secretariat within this time frame.				reports does not directly contribute to the risk.
Notify any action taken in accordance with its domestic laws in relation to infringements which fall within the legal jurisdiction of the port Member.			ID – Not serious.	The Secretariat reporting of compliance with inspection report provisions is based on Members reported port inspections in their national reports.
Vessel and farm authorisation:	Paper: Compliance with Measures - Attachment A and Operation of CCSBT Measures			Associated Compliance Risk: CCSBT Members not fully implementing specific Conservation and Management Measures (CMM's) as agreed, particularly the binding ERS measures of IOTC, ICCAT and WCPFC. Risk Matrix Score: Low.
Provide and update the required information on authorised fishing vessels, carrier vessels and/or farms to the Executive Secretary no later than 15 days after the vessel and/or farm is authorised or the change occurs.	CwM Attachment A: All Fishing Vessel authorisations received and cover all catch/harvest days <i>Reported as an assessment of whether or not all FVs were authorised on the date of the catch/harvest (✓, F, P or X).</i>		NZ – Should be escalated where significant/ongoing delays are identified. ID – Not serious.	The associated compliance risk has been assessed by Members as low, so no obligations related to vessel and farm authorisation have been suggested as serious non-compliance at this stage. We welcome Members thoughts on the seriousness of non-compliance related to these obligations and the current Secretariat reporting on
	All Carrier Vessel authorisations received <i>Reported as an assessment of whether or not all CV authorisations were received (✓, F, P or X).</i>		NZ – Also relate to other CV/Transshipment obligations required under the Commission and other RFMOs. ID – Not serious.	
	Farm authorisations received			

Reporting Obligation	Where Compliance is Assessed and How it is Reported	Serious non-compliance?	Member Comment	Secretariat Comment
	<i>Reported as an assessment of whether or not all farm authorisations were received (✓, F, P or X).</i>			compliance with these obligations.
	Operation of CCSBT Measures Records of Authorised Vessels and Farms. <i>Reported as general discussion on whether all the information required has been submitted and any issues with the authorisations of vessels and farms.</i>			
Vessel Monitoring System:	Paper: Operation of CCSBT Measures			Associated Compliance Risk:
The Members and CNMs of the Extended Commission shall provide VMS summary reports annually in advance of the Compliance Committee meeting and in the format approved by the Commission.	Based on Member Reports section 2.2.4 <i>Reported as a general discussion based on the information contained in Member reports on VMS implementation.</i>		ID – Not serious.	CCSBT Members not fully implementing specific Conservation and Management Measures (CMM's) as agreed, particularly the binding ERS measures of IOTC, ICCAT and WCPFC. Risk Matrix Score: Low. The associated compliance risk has been assessed by Members as low, so no obligations related to VMS have been suggested as serious non-compliance at this stage. The Secretariat reporting on VMS implementation is based on Member reporting in their annual reports. But the level of Secretariat reporting directly relates to the level of information

Reporting Obligation	Where Compliance is Assessed and How it is Reported	Serious non-compliance?	Member Comment	Secretariat Comment
				reported by Members, which in some circumstances can lack detail.
Scientific Observer Programme:	Paper: Compliance with Measures - Attachment C.			Associated Compliance Risk: Insufficient scientific observer data to manage target and non-target species. Risk Matrix Score: Medium/High.
analyse, at least once a year, the effectiveness of the actual assignment of observers in achieving 10% coverage across a representative range of the Member's SBT fisheries.	Based on Member Reports section 2.2.3 <i>Reported in a table that contains the percentage of observer coverage achieved as reported in Member reports.</i>		NZ – Impacts other ERS reporting. ID – Not serious.	Scientific observer programme coverage has not been suggested as serious non-compliance at this stage, noting that this is currently a target, not a requirement.
Scientific Data Exchange:	Paper: Compliance with Measures - Attachment A.			
All Members are required to provide the data specified in the most recent annual data exchange requirements by the ESC and by the due date specified in those requirements.	Total Catch by Fleet <i>Reported as whether or not this was provided (✓, F, P or X), no quantities given in the attachment.</i>		ID – Not serious.	No directly related compliance risk, but there are linkages to those risks associated with catch reporting. It is recommended that any broader assessment of scientific reporting requirements is best undertaken at ESC, however we welcome Members thoughts on the seriousness of non-compliance with these reporting obligations and current Secretariat reporting on this.
	Catch and Effort <i>Reported as whether or not this was provided (✓, F, P or X), no quantities given in the attachment.</i>		ID – Not serious.	
	Size Data <i>Reported as whether or not this was provided (✓, F, P or X).</i>		ID – Not serious.	
	Direct Ageing <i>Reported as whether or not this was provided (✓, F, P or X).</i>		ID – Not serious.	

Reporting Obligation	Where Compliance is Assessed and How it is Reported	Serious non-compliance?	Member Comment	Secretariat Comment
Ecologically Related Species Data Exchange:	Paper: Annual Report on Members' implementation of ERS measures and performance with respect to ERS.			
Members will comply with the requirements of the ERSWG Data Exchange.	<i>Reported in the paper as a general discussion based on the information and data provided by Members.</i>		ID – Not serious.	Associated Compliance Risk: Incomplete or inaccurate reporting of non SBT bycatches, including seabirds. Risk Matrix Score: High. Although this has an associated compliance risk that has been assessed as high, this has not been suggested as 'serious non-compliance' at this stage because, as noted above, any assessment of the ERS reporting requirements is recommended as best undertaken at ERSWG.