



CCSBT-CCWG3/1404/05

Development of an Updated Three-Year Compliance Action Plan (2015 – 2017)

Introduction

The CCSBT Compliance Plan supports the CCSBT Strategic Plan. It consists of five parts:

- Goals and Strategies,
- Compliance Principles,
- Roles and Responsibilities,
- Plan implementation and review, and
- **Three -Year Action Plan** (Appendix).

The current Three-Year Action Plan specifically addresses areas of priority compliance risk, and covers the period 2012 to 2014.

Background and Purpose

As part of the agreed workplan developed by the Eighth meeting of the Compliance Committee (CC8) in 2014, the Executive Secretary, in consultation with the CC Chair, was tasked with developing a draft updated 3 year Compliance Action Plan for the period 2015 – 2017.

In accordance with this workplan, a draft updated Compliance Action Plan (including comments) was developed and is provided at **Attachment A** for Members' consideration. The current CCSBT Compliance Plan, including the Three-Year Action Plan for the period 2012 – 2014 inclusive is also provided (**Attachment B**) for reference purposes.

Note that throughout Attachments A and B, references to Members include Cooperating Non-Members of the Extended Commission (CNMs), and any references to the Commission include the Extended Commission (EC).

It is envisaged that following CCWG3, an updated draft of this Action Plan will be developed for submission to CC9. Depending upon available timeframes, it may also be possible to incorporate relevant compliance issues raised by the CCSBT performance review panel's report (2014) into this draft.

Appendix 1. Draft Updated Three-Year Action Plan (2015-2017)

This Appendix sets out actions under each Goal and Strategy of the proposed updated Compliance Action Plan for the three year period 2015 - 2017.

Goal 8 – Monitoring, control, and surveillance							Status	Additional Comment	
Integrated, targeted and cost-effective monitoring, control and surveillance measures are in place to ensure the Commission's goals									
CCSBT Strategic Plan Strategy No.	Compliance Plan Strategy No.		Priority Actions	2015	2016	2017			
8.1 (i)	8.1 Implementing agreed MCS measures	8.1.1	Maintain and enhance:						
			a) the agreed list of conservation and management measures					On-going from previous Plan and updated	
			b) the already developed Minimum Performance Requirements (MPRs), in particular the Routine Reporting Measures					On-going from previous Plan and updated	
			c) the associated consolidated national report template in which Members report their performance against the obligations and agreed MPRs					On-going from previous Plan and updated	
			8.1.2	Develop and adopt additional minimum performance requirements as required:					
			a) Transhipments					On-going from previous Plan	
			b) Authorisation Measures - 2.1 Record of Authorised Farms, 2.2 Record of Authorised Vessels, 2.3 Record of Authorised Carrier Vessels					New	
			c) MCS Measures - CCSBT IUU Vessel List					New	
			d) MCS Measures - Port State Measures					New	
			e) Science Measures - 4.1 Scientific Observer Program Standards					New	
		f) Measures relating to ERS - 5.2 Recommendation on ERS					New		
		g) MCS Measures - 3.2 VMS					New		
		8.1.3	Performance reporting system in place (the Secretariat's Compliance with Measures and Operation of CCSBT Measures reports), including consideration of Members' performance reports				On-going from previous Plan and updated		

Goal 8 – Monitoring, control, and surveillance (continued)							Status	Additional Comment
Integrated, targeted and cost-effective monitoring, control and surveillance measures are in place to ensure the Commission’s goals								
CCSBT Strategic Plan Strategy No.	Compliance Plan Strategy No.		Priority Actions	2015	2016	2017		
8.1 (ii)	8.2 Develop and implement MCS strategy	8.2.1	Identify areas of greatest compliance risk in order to facilitate a consistent and coordinated approach to compliance/MCS planning and prioritisation by Members and Compliance Committee					No action was planned/ conducted for the last 3 year period: Carried forward and updated
		8.2.2	Review and rationalise measures and obligations to eliminate unnecessary compliance costs (should follow and/or compliment work described under item 8.2.1, 8.3.1 and 8.3.3)					No action was planned for the last 3 year period, although some work was completed for this item during 2013: Carried forward
		8.2.3	Review all CCSBT Compliance Resolutions, decisions and recommendations and identify any that have become obsolete/outdated. Take appropriate actions to amend any issues identified, e.g. the Compliance Action Plan Resolution and some reporting obligations.					New

Goal 8 – Monitoring, control, and surveillance (continued)							Status	Additional Comment	
Integrated, targeted and cost-effective monitoring, control and surveillance measures are in place to ensure the Commission’s goals									
CCSBT Strategic Plan Strategy No.	Compliance Plan Strategy No.		Priority Actions	2015	2016	2017			
8.1 (iii)	8.3 Strengthen compliance (MCS systems and services)	8.3.1	Explore the costs and benefits of:						
			a) Rationalisation of VMS among Members and RFMOs	Do Members envisage that work is required in this area?			No action was planned/ conducted for the last 3 year period: Carried forward but ON HOLD		
			b) Utilisation of electronic observation technologies as an alternative to traditional human observer coverage programmes				New		
			c) Introducing systems/ processes to better integrate and/or improve the efficiency of the collection and management of data/information submitted in accordance with CCSBT’s Catch Documentation Scheme (CDS), VMS, Observer and Transhipment Measures, particularly focusing on collecting the data/information once and as close to its original source as possible				New		
			8.3.2	Develop and implement agreed minimum catch monitoring requirements for each fishing sector, for example commercial (EEZ longline, High Seas longline, purse seine, other) and non-commercial (artisanal, recreational, other)				New	
			8.3.3	a) Conduct an independent performance review of the CCSBT CDS, including consideration of: i) The costs/ benefits of using Radio Frequency Identification (RFID) tagging and other electronic tagging technologies, etc for tagging SBT and/or SBT product cartons in future in association with an electronic CDS (eCDS), and ii) Enhancements such as developing and implementing an electronic inventory system that details how many SBT are on board authorised CCSBT fishing or carrier vessels at any point in time				New	

Goal 8 – Monitoring, control, and surveillance (continued)							Status	Additional Comment
Integrated, targeted and cost-effective monitoring, control and surveillance measures are in place to ensure the Commission’s goals are met.								
CCSBT Strategic Plan Strategy No.	Compliance Plan Strategy No.		Priority Actions	2015	2016	2017		
8.1 (iii) continued	8.3 Strengthen compliance (MCS systems and services)	8.3.3 contd.	b) Depending on the outcomes/ recommendations of the CCSBT CDS review, and taking into consideration the goals of trying to rationalise CDS systems with other RFMOs and to improve the effectiveness of landing inspections, etc, develop a proposal on how best to progress and improve the existing CCSBT CDS into the future				No action was planned/ conducted for the last 3 year period: Carried forward and updated	
		8.3.4	Complete and implement CCSBT Port State Measures				Carried forward from previous Plan and updated	
		8.3.5	Maintain and strengthen relationships with other Regional Fisheries Management Organisations (RFMOs) and international networks (such as the International Monitoring, Control and Surveillance Network) to enable Members to better monitor their fleet performance and any IUU fishing, and investigate non-compliance				On-going from previous Plan and updated	CCSBT joined the IMCS network in December 2013
		8.3.6	Review existing MOUs with IOTC and ICCAT with reference to any changes in the Transshipment Resolution				New	

Goal 8 – Monitoring, control, and surveillance (continued)							Status	Additional Comment
Integrated, targeted and cost-effective monitoring, control and surveillance measures are in place to ensure the Commission's goals								
CCSBT Strategic Plan Strategy No.	Compliance Plan Strategy No.		Priority Actions	2015	2016	2017		
8.1 (iv)	8.4 Monitoring expansion of SBT markets	8.4.1	Regular monitoring for emerging SBT markets, including reviews of SBT trade data				On-going from previous Plan and updated	Merged original 8.4.1 with original 8.4.2 to create a new combined 8.4.1
		8.4.2	Research, develop and potentially implement systematic monitoring and surveillance regimes for IUU SBT fishing				On-going from previous Plan and updated	
8.1 (v)	8.5 Sharing compliance data	8.5.1	Determine standardised MCS information to share with Members and Port States, including consideration of sharing near real-time vessel location and catch and effort information (review and update CPG 4 in association with this goal as appropriate)	Compliance Policy Guideline 4, "Information collection and sharing policy", already provides some high level guidance in this area			No action was planned/ conducted for the last 3 year period: Carried forward	
8.1 (vi)	8.6 Secretariat MCS Services	8.6.1	Analyse MCS data and report on trends (annually), as well as assessing the effectiveness of MCS measures based on the data submitted				On-going from previous Plan and updated	Merged original 8.6.1 with original 8.6.2 to create a new combined 8.6.1
		8.6.2	Ensure all transshipment observers are trained in CCSBT obligations (in case SBT is found)				No specific action was planned/ conducted for the last 3 year period: Carried forward and updated	Observers already receive training in CCSBT-specific measures
		8.6.3	Trend analysis of publicly available market data				No action was planned/ conducted for the last 3 year period: Carried forward	
	8.7 Research & development	8.7.1	Regular report-backs on R and D on new technologies & tools to aid observers, certifiers, and validators to identify SBT (in particular once processed) to be provided by Members				On-going from previous Plan	

Goal 9— Members' obligations							Status	Additional Comment
All Members comply with rules of CCSBT.								
CCSBT Strategic Plan Strategy No.	Compliance Plan Strategy No.	Priority Actions	2015	2016	2017			
9.1 (i)	9.1 Auditing Members' systems and processes	9.1.1	Develop and implement an integrated programme for conducting regular Quality Assessment Reviews (QARs) for each Member every 3 - 4 years (for example, 2 QARs in total to be conducted each year), as well as conducting ad hoc targeted QARs based on risk assessment advice				New	
		9.1.2	Receive audit reports, consider findings, and follow-up with individual Members to check whether QAR recommendations have been addressed				On-going from previous Plan and updated	
9.1 (ii)	9.2 Corrective action and remedies	9.2.1	Develop a process for the investigation of alleged non-compliance and conduct investigations as needed	Do Members envisage that this goal is already covered sufficiently by section 4 of Compliance Policy Guideline 3: Corrective Actions Policy?			No action was planned/ conducted for the last 3 year period: Carried forward and updated	Merged original 9.2.1 with original 9.2.2 to form a new 9.2.1
		9.2.2	Review and enhance the Corrective Actions Policy, and consider incorporating specific actions which are linked to compliance performance, such as adjustments to future allocations or targeted compliance reviews	Section 5 of Compliance Policy Guideline 3 already provides some guidance in this area			New	

Goal 10: Supporting developing countries							Status	Additional Comment
Developing country Members and Cooperating Non-Members are able to comply with the Commission's management measures and								
CCSBT Strategic Plan Strategy No.	Compliance Plan Strategy No.		Priority Actions	2015	2016	2017		
10.1 (i)	10.1 Compliance assistance	10.1.1	Use the output from QARs to identify areas where targeted assistance to Indonesia could best be provided, then provide MCS assistance in the areas identified				On-going from previous Plan and updated	
		10.1.2	Ongoing identification and sharing of best practice for MCS systems				On-going from previous Plan	
Goal 11: Participation in the CCSBT							Status	Additional Comment
Encourage the cooperation of port and market States with CCSBT's objectives and management arrangements.								
CCSBT Strategic Plan Strategy No.	Compliance Plan Strategy No.		Priority Actions	2015	2016	2017		
11.2	11.1 Inclusive cooperation	11.1.1	Identify (using trade and market analyses as well as any information supplied by Members) non-member port and market states whose cooperation should be sought				On-going from previous Plan and updated	
		11.1.2	Nominate such States to the Commission				On-going from previous Plan	

Appendix 1. Three-Year Action Plan (2012-2014)

This Appendix sets out actions under each Goal and Strategy over the next three years. Numbers shown in blue are the numbers used for the strategies as set out in the CCSBT Strategic Plan.

In October 2010 the Extended Commission (EC) agreed that the Compliance Plan should place special emphasis on managing specific compliance risks identified by the Compliance Committee on the basis of a risk assessment. The specific compliance risks are listed below.

- Effective implementation of the CDS, with special emphasis on physical validation and appropriate verification.
- Improvement to the transshipment monitoring program, including prior notification of SBT transshipments with observer deployment requests and training of all observers to enable detection of SBT transshipments even when SBT is not declared.
- SBT being landed as other (non SBT) species.
- Expansion of markets for SBT.
- Monitoring of catches from the farm sector.
- Non-reporting of bycatch and discards against national allocations.
- Better systems to provide information to port States to assist port States to provide improved monitoring of SBT activities.

Based on Members' feedback in August 2011, the specific compliance risks have been prioritised. In the first period (2012 to 2014) the Action Plan focuses on the following priorities:

- compliance with national allocations
- implementing the CDS
- IUU fishing
- transshipment at sea.

Actions which are not directly related to current priorities show no activity in the current period.

Goal 8 – Monitoring, control, and surveillance				
Integrated, targeted and cost-effective monitoring, control and surveillance measures are in place to ensure the Commission’s goals are met.				
Strategy	Priority Actions	2012	2013	2014
8.1 Implementing agreed MCS measures 8.1 (i)	8.1.1 Develop and maintain an agreed list of conservation and management measures			
	8.1.2 Develop and adopt minimum performance requirements			
	- Compliance with national allocations			
	- CDS implementation			
	- Transhipments			
	8.1.3 Develop a revised and consolidated template for Members to report their performance against the obligations and agreed minimum performance requirements			
	8.1.4 Performance reporting system in place, including consideration of Members’ performance reports and Secretariat’s variance report			
8.2 Develop and implement MCS strategy 8.1 (ii)	8.2.1 Develop a compliance risk assessment framework to facilitate a consistent and coordinated approach to compliance/MCS planning and prioritisation by Members and Compliance Committee			
	8.2.2 Review and rationalise measures and obligations to eliminate unnecessary compliance costs			
8.3 Strengthen compliance (MCS systems and services) 8.1 (iii)	8.3.1 Explore costs and benefits of: common IUU vessel list with other RFMOs			
	- rationalisation of VMS among Members and RFMOs			
	- sharing common vessel registries with RFMOs			
	- rationalising CDS with other RFMOs			
	8.3.2 Evaluate ways to effectively implement Port State obligations			
	8.3.3 Build on existing bilateral arrangements and international networks (such as International Monitoring, Control and Surveillance Network) to enable Members to better monitor their fleet performance and any IUU fishing, and investigate non-compliance			
8.4 Monitoring expansion of	8.4.1. Implement systematic monitoring regime for emerging SBT markets			

Goal 8 – Monitoring, control, and surveillance			
Integrated, targeted and cost-effective monitoring, control and surveillance measures are in place to ensure the Commission’s goals are met.			
SBT markets 8.1 (iv)	8.4.2. Review SBT trade data		
	8.4.3. Implement systematic monitoring and surveillance regimes for IUU SBT fishing		
8.5 Sharing compliance data 8.1 (v)	8.5.1. Determine standardised MCS information to share with Members and Port States		
8.6 Secretariat MCS Services 8.1 (vi)	8.6.1. Analyse MCS data and report on trends (annually)		
	8.6.2. Assess effectiveness of MCS measures based on data submitted		
	8.6.3. Ensure all transshipment observers are trained in CCSBT obligations (in case SBT is found)		
	8.6.4. Trend analysis of publicly available market data		
8.7 Research & development	8.7.1. R & D on new technologies & tools to aid observers, certifiers, and validators to identify SBT (in particular once processed)		

Goal 9— Members' obligations				
All Members comply with rules of CCSBT.				
Strategy	Priority Actions	2012	2013	2014
9.1 Auditing Members' systems and processes 9.1 (i)	9.1.1 Subject to funding in the CCSBT budget, appoint CCSBT auditor to conduct voluntary trial			
	9.1.2 Complete audit trial			
	9.1.3 Receive audit reports, consider findings, and take appropriate action			
9.2 Corrective action and remedies 9.1 (ii)	9.2.1. Develop procedure for investigation of alleged non-compliance			
	9.2.2. Investigate allegations as needed			

Goal 10: Supporting developing countries				
Developing country Members and Cooperating Non-Members are able to comply with the Commission's management measures and other requirements.				
Strategy	Priority Actions	2012	2013	2014
10.1 Compliance assistance 10.1 (i)	10.1.1 Provide a programme of MCS assistance to Indonesia			
	10.1.2 Ongoing Identification and sharing of best practice for MCS systems			

Goal 11: Participation in the CCSBT				
Encourage the cooperation of port and market States with CCSBT's objectives and management arrangements				
Strategy	Priority Actions	2012	2013	2014
11.1 Inclusive cooperation 11.2	11.1.1 Identify non-member port and market states whose cooperation should be sought			
	11.1.2 Nominate such States to the Commission			