CCSBT–CC/1610/11

Preliminary Consideration of a Three-Year Compliance Action Plan for 2018 – 2020

1. Introduction
The Compliance Plan includes a Three-Year Compliance Action Plan (CAP) to address priority compliance risk areas. The current CAP covers the period 2015 to 2017 inclusive, and is provided for reference at **Attachment A**.

A three-year CAP for the 2018 – 2020 period will need to be developed during 2017, and therefore, it is now timely for Members to commence:

- reviewing areas of greater perceived compliance risk,

- considering action items to consider including in the 2018 – 2020 CAP (or potentially items to discontinue), and

- identifying and confirming future compliance priorities for the Secretariat, and associated resourcing for the 2018 - 2020 period.

In terms of a preliminary consideration of action items, this paper first re-visits action items proposed at the Ninth Compliance Committee meeting (CC9) to address the 2014 Performance Review Panel's (PRP's) Recommendations, and then discusses some additional items proposed in consultation with the CC Chair.

2. Compliance Risks
A list of compliance risk areas is provided on page one of the current CAP and was most recently updated at CCSBT 21 in 2014. Members are invited to review this list and provide recommendations on whether it may need to be further updated for a draft 2018 – 20 CAP.

3. Proposed Action Items to Address the 2014 CCSBT PRP's Recommendations
The Secretariat's paper CCSBT-CC/1410/05 to CC9 included a set of potential new or amended compliance action items that were proposed by the Secretariat to address the 2014 PRP Compliance/ International Cooperation recommendations.

The Compliance Committee (CC) agreed that these particular action items should not be considered by the CC until the Extended Commission (EC) had first had an opportunity to review them, and would instead be considered at a later date.

As these items have since been reviewed by the EC, they are now provided for the CC's consideration at **Attachment B**.

The proposed action items in **Attachment B** include:
- Review and revision of the Vessel Monitoring System (VMS) Resolution;
- Development of standards and protocols for a High Seas Boarding and Inspection Scheme;
- Adoption of useful aspects of other tuna RFMOs' formats for assessing compliance with data reporting requirements and give consideration to a harmonised format;
- Refinement of the Corrective Actions Policy, and
- Targeted analysis of capacity building needs and compliance "missions" to assist developing State Members.

The associated list of relevant Compliance and Enforcement, and International Cooperation recommendations made by the PRP and the Secretariat's comments on the items above[1], is provided at **Attachment C.**

4. Additional Action Items for Potential Inclusion within the 2018 – 20 CAP

Members are invited to make preliminary recommendations about any new/ priority compliance areas that could be included within a draft 2018 – 2020 CAP. In consultation with the CC Chair, the Secretariat has identified a number of areas that Members may wish to consider.

These areas include, but are not limited to:
- implementation of electronic observation technologies,
- enhanced Vessel Monitoring System (VMS) arrangements/ positional reporting requirements,
- review and implementation of the CCSBT IUU List cross-listing provision, and
- review of current compliance reporting requirements with respect to Ecologically Related Species (ERS) obligations.

A brief explanation about each of these items is provided below.

4.1 **Implementation of electronic observation technologies**

The current CAP already includes action item 8.3.1a)i) which is scheduled to occur during 2017:
- Explore the costs and benefits of/ test the utilisation of electronic observation technologies to supplement traditional human observer coverage programmes.

Depending on the results, the next step in this process could potentially be to commence implementation of these technologies.

4.2 **Enhanced VMS/vessel positional reporting requirements**

A proposed VMS action item (8.3.5[2]) was included in the Secretariat's paper CCSBT-CC/1410/05 to CC9 to address the PRP's recommendation PR-2014-45, and was already mentioned in section 3.

Best practice VMS arrangements vary depending upon the type of fishing being undertaken, the management measures in place, and potential use of the data in areas other than MCS (*i.e.* to improve the accuracy of stock assessments). Current CCSBT VMS arrangements could be improved substantially by making real time VMS data available to the Secretariat to help ensure compliance with CCSBT Conservation and Management Measures (CMMs).

Harmonising VMS arrangements across Members could significantly improve overall MCS outcomes and could include items such as:
- Requiring all authorised vessels to continuously report in near real time and having agreed protocols which are implemented in the case of a unit failure;
- Specifying approved VMS unit types and ensuring units are tamper proof; and
- Implementing two way communication.

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[1] Initially provided to CC9 as Attachment C of paper CCSBT-CC/1410/05

[2] Now labelled 8.3.5x1 in Attachment B of this paper: **"**Review and revise the CCSBT VMS Resolution (2008), for example to include specific baseline operational VMS standards for SBT vessels regardless of their area of operation, such as reporting frequencies, recipients and use of VMS data."

Such arrangements could also potentially serve as the forerunner of other VMS-based functionality such as electronic catch reporting, an integrated CDS, greater product traceability, real time observer information and support enhanced quota management.

In addition, as a supplement to VMS, Members could consider investigating the costs and benefits of requesting the Secretariat to obtain an AIS[3] data subscription[4]. Such a subscription would provide independent vessel positions for larger vessels. It could for example allow the Secretariat to independently cross-check the positions of known transhipments, and of Non-Member vessels. In order to carry out these kinds of analyses, additional information technology personnel resourcing would need to be considered.

4.3 Review/ Implementation of the CCSBT IUU Vessel List cross-listing provision

The CCSBT IUU Vessel Resolution provides the following cross-listing provision at paragraph 20:

"The Extended Commission may consider cross-listing IUU vessel lists with all other tuna Regional Fisheries Management Organisations and relevant organisations on a case by case basis as agreed by the Extended Commission."

Members may wish to consider initiating the implementation of this cross-listing provision during the next CAP period. In order to do this, it would first be necessary to review the current CCSBT IUU Vessel Resolution cross-listing provision (paragraph 20).

4.4 Review of current compliance reporting requirements with respect to ERS obligations

Currently there are many well-defined compliance reporting requirements, especially Catch against Allocation and the CCSBT Catch Documentation Scheme (CDS). With regard to ERS compliance reporting, the following requirements exist:

i) Submission of the ERS national report four weeks in advance of ERSWG. The compliance reporting part of this report involves describing the mandatory and voluntary mitigation measures for each fleet, including how compliance with the measures is monitored and specifying the level of compliance for each measure, and

ii) Section III (2) on ERS of the annual reporting template to the CC and EC:

- section (a) is about implementation of International Plans of Action (IPOAs)/ FAO guidelines and compliance with ERS reporting requirements to the ICCAT[5], IOTC and WCPFC[6] when fishing in those respective Convention Areas;
- section (b) tabulates the number of observed ERS interactions;
- section (c) is about describing the current mitigation requirements; and
- section (d) is about reporting the methods used to monitor compliance with bycatch mitigation measures, the level of coverage of such monitoring and the type of information that is collected on mitigation measures as part of compliance programmes for SBT vessels.

Members may wish to consider adding action items into the 2018-20 CAP to review and/or increase the level of ERS compliance reporting requirements and independent verification, as well as potentially introducing a standing CC agenda item on ERS compliance.

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[3] AIS means Automatic Identification System and is an automatic tracking system used on ships and by Vessel Traffic Services for identifying and locating vessels by electronically exchanging data with other nearby ships, AIS base stations, and satellites. The International Maritime Organisation's International Convention for the Safety of Life at Sea requires AIS to be fitted aboard international voyaging ships with gross tonnage (GT) of 300 or more, and all passenger ships regardless of size.

[4] The Secretariat has not yet been able to determine the approximate cost of an AIS subscription for the CCSBT but will try to obtain estimates in advance of CC11 so that they can be provided to the meeting

[5] The International Commission for the Conservation of Atlantic Tunas

[6] The Western and Central Pacific Fisheries Commission

5. Compliance Priorities for the Secretariat
Members are invited to make preliminary recommendations about which compliance areas should be prioritised for action by the Secretariat during 2018 – 2020.

In order to inform any discussions on resourcing, an estimate of the percentage of time currently spent by the Compliance Manager on each broad compliance activity area is provided for Members' information at **Attachment D**. Note that while the Compliance Manager is the Secretariat's main compliance resource, significant blocks of time are also spent by other CCSBT personnel in maintaining systems such as the Catch Documentation Scheme (CDS) application and authorised vessel records, entering CDS data, responding to requests and collaborating in the preparation of papers.

Currently, the Secretariat's compliance resources are being utilised to full capacity. Therefore, the addition of any extra work items to future CAPs/ Workplans, will require either a reprioritisation of existing resources or additional personnel.

Prepared by the Secretariat

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

This Plan sets out actions under each Compliance Goal and Strategy for the period 2015 – 2017.

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 identified are listed below;
- Effective implementation of the CDS, with special emphasis on physical validation and appropriate verification,
- Improvement to the transhipment monitoring program, including prior notification of SBT transhipments with observer deployment requests and training of all observers to enable detection of SBT transhipments 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 at CCWG in April 2014, the following additional compliance risks were identified:
- Information gaps in relation to recreational catch and bycatch particularly as the SBT stock rebuilds under the Management Procedure,
- Cost restraints being experienced by some Members that may limit their ability to fund appropriate compliance measures,
- Limitations of developing countries, and
- Members' National Policies.

The shaded cells in the table represent the year(s) in which the actions are planned to be undertaken.

				2015	2016	2017
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.						
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	▓	▓	▓
			b) the already developed Minimum Performance Requirements (MPRs), in particular the Routine Reporting Measures	▓	▓	▓
			c) the associated consolidated national report template in which Members report their performance against the obligations and agreed MPRs	▓	▓	▓
		8.1.2	Develop and adopt additional minimum performance requirements as required:			
			a) Transhipments	▓	▓	
			b) Authorisation Measures - 2.1 Record of Authorised Farms, 2.2 Record of Authorised Vessels, 2.3 Record of Authorised Carrier Vessels	▓		
			c) MCS Measures - CCSBT IUU Vessel List		▓	
			d) MCS Measures - Port State Measures		▓	▓
			e) Science Measures - 4.1 Scientific Observer Program Standards			▓
			f) Measures relating to ERS - 5.2 Recommendation on ERS			▓
			g) MCS Measures - 3.2 VMS			
		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	▓	▓	▓

Goal 8 – Monitoring, control, and surveillance (continued) 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 (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			
		8.2.2	Review and rationalise measures and obligations to eliminate unnecessary compliance costs to the catching sector and administrative costs to Governments (should follow and/or compliment work described under item 8.2.1, 8.3.1 and 8.3.3)			
		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			

CCSBT Strategic Plan Strategy No.	Compliance Plan Strategy No.		Priority Actions	2015	2016	2017
Goal 8 – Monitoring, control, and surveillance (continued) Integrated, targeted and cost-effective monitoring, control and surveillance measures are in place to ensure the Commission's goals are met.						
		8.3.1	a) i) Explore the costs and benefits of/ test the utilisation of electronic observation technologies to supplement traditional human observer coverage programmes,			
			ii) Depending on the results of the analyses in a) i), consider implementing electronic observation technologies			
			b) Conduct a study to examine 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. Seek to harmonise these with other RFMOs' systems and processes wherever possible			
		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)			

8.1 (iii): Continued	*8.3 Strengthen compliance (MCS systems and services): Continued*	**8.3.3**	a) Review and amend the CCSBT CDS Resolution as appropriate to facilitate the development and implementation of an eCDS, taking into consideration the goals of trying to rationalise CDS systems with other RFMOs, and to improve the effectiveness of landing inspections, etc			
			b) Depending on the outcomes of the CCSBT CDS review, implement an eCDS.			
		8.3.4	a) Complete and implement CCSBT Port State Measures			
			b) Complete and implement the revised Transhipment Measure			
		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			
		8.3.6	Review existing MOUs with IOTC and ICCAT with reference to any changes in the Transhipment Resolution, and develop a transhipment MOU with WCPFC			

Goal 8 – Monitoring, control, and surveillance (continued) 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 (iv)	*8.4 Monitoring expansion of SBT markets*	8.4.1	Regular monitoring for emerging SBT markets, including reviews of SBT trade data and exploration of any available options, including information from NGOs, for tracking the trade of SBT between those States that are not Members or CNMs of the CCSBT and/or may not be included in the Secretariat's GTA subscription			
8.1 (v)	*8.5 Sharing compliance data*	8.5.1	Share catch and effort data, and any other available information/ intelligence that will assist with the identification of non-Member fishing			
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			
		8.6.2	Ensure all transhipment observers are trained in CCSBT obligations (in case SBT is found)			
		8.6.3	Trend analysis of publicly available market data			
	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			

Goal 9— Members' obligations						
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 (for example, 2 QARs in total to be conducted each year), as well as conducting ad hoc targeted QARs based on risk assessment advice. At least 1 QAR is to be completed each year			
		9.1.2	Receive audit reports, consider findings, and follow-up with individual Members to check whether QAR recommendations have been addressed			
9.1 (ii)	**9.2 Corrective action and remedies**		No current work scheduled			

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.						
CCSBT Strategic Plan Strategy No.	**Compliance Plan Strategy No.**		**Priority Actions**	**2015**	**2016**	**2017**
10.1 (i)	**10.1 Compliance assistance**	**10.1.1**	i) 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 ii) Explore the use of market mechanisms to assist 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.						
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			
		11.1.2	Nominate such States to the Commission			
		11.1.3	Research, develop and potentially implement systematic monitoring and surveillance regimes for IUU SBT fishing			

Secretariat Proposed Compliance Action Plan Items Initially Presented to CC9 to Address the 2014 PRP's Recommendations

(The tracked changes are presented to indicate the text proposed by the Secretariat at CC9.

 If the whole action item is tracked, then this indicates that a completely new action item was proposed at CC9.)

CCSBT Strategic Plan Strategy No.	Compliance Plan Strategy No.	Action Item No.	Priority Actions
8.1 (iii)	*8.3 Strengthen compliance (MCS systems and services)*	8.3.x1	Review and revise the CCSBT VMS Resolution (2008) for example to include specific baseline operational VMS standards for SBT vessels regardless of their area of operation, such as reporting frequencies, recipients and use of VMS data
		8.3.x2	Develop standards and protocols for a High Seas boarding and inspection scheme for SBT vessels and harmonise this with other RFMOs' schemes wherever possible
		8.3.x3	Liaise with the other tuna RFMOs in relation to the formats they use for assessing compliance with data reporting requirements, adopt useful aspects of these, and give consideration to a harmonised format
9.1 (ii)	*9.2 Corrective action and remedies*	9.2.1	No current work scheduled Continue to refine the Corrective Actions Policy and provide guidelines for standard implementation, for example:
			a) Develop and maintain a record of any instances of non-compliance identified, and the corrective action that was taken in response to that non-compliance
			b) consider whether Members should be able to participate in decision-making on corrective actions that pertain to themselves
10.1 (i)	*10.1 Compliance assistance*	10.1.2	Ongoing identification and sharing of best practice for MCS systems through targeted analysis of capacity building needs and Compliance "missions" to assist developing State Members

The 2014 Performance Review Panel's Recommendations Concerning Compliance & Enforcement and International Cooperation that were not yet Considered by the Compliance Committee

A. Compliance and Enforcement

Review Panel Recommend-ation Number	Performance Review Panel Recommendation	Secretariat Comment	Reference Number
PR-2014-45	The CCSBT should trigger paragraph 5 of its 2008 CCSBT Resolution and goal 8.3 of its Compliance Action Plan, and review and revise the Resolution to include specific baseline operational VMS standards for SBT vessels regardless of their area of operation, such as reporting frequencies, recipients and use of VMS data (such as by the CCSBT Secretariat, SC/ESC, and ERSWG and Compliance Committees (other than summary reports currently required under the 2008 Resolution).	Proposed adding an item 8.3.x1.[1]	8.3.x1
	For instance, CCSBT members and CNMs could agree that their SBT vessels operating in other RFMO Convention Areas would transmit the VMS reports sent under those VMS programs to the CCSBT Secretariat.	No item was proposed to be added for this part of the recommendation because the main RFMO of relevance (IOTC) with respect to the quantity of SBT caught, does not have VMS transmissions sent to the Secretariat.	-
PR-2014-47	CCSBT should therefore develop as a matter of priority procedures for high seas boarding and inspection of SBT vessels.	Proposed adding item 8.3.x2.	8.3.x2

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[1] Currently the CCSBT has two active VMS Resolutions: 'Resolution on the Development and Implementation of a VMS' and, 'Resolution on Establishing the CCSBT VMS'. The CCSBT specifies that the operational standards of other Regional Fisheries Management Organisations (RFMOs) must be followed for vessels fishing for SBT within their Convention Areas, and that the VMS standards of the Indian Ocean Tuna Commission (IOTC) must be followed for vessels fishing for SBT in any other High Seas area where there is no VMS established.

Review Panel Recommendation Number	Performance Review Panel Recommendation	Secretariat Comment	Reference Number
PR-2014-48	The CCSBT has taken steps since 2008 to considerably strengthen its compliance assessment processes and tools, including a framework for applying a range of penalties for instances of Member and CNM non-compliance with CCSBT measures. CCSBT should continue to refine these tools and ensue they are transparently and fairly implemented when necessary to ensure legitimacy and integrity in its system, thereby creating an incentive for compliance among members and CNMs.	Proposed adding item 9.2.1a) to address the transparency point.	9.2.1 a)
PR-2014-49	The CCSBT has taken steps since 2008 to considerably strengthen its compliance assessment processes and tools, including reworking its Compliance Committee terms of reference, giving the Committee adequate time to meet, and adopting an IUU Vessel List measure. Members and CNMs are cooperating with the process, providing their national reports on time and submitting themselves to a multilateral review of their compliance in the Compliance Committee. The CCSBT should continue implement these tools fully and ensure non-compliance is transparently and fairly assessed, thereby creating an incentive for compliance among members and CNMs. The CCSBT should also consider mandating that a member who is being considered for a sanction under its policies may not participate in the decision-making on that issue.	Proposed adding item 9.2.1 a) & b) to address the transparency and decision-making points.	9.2.1 a), b)

B. International Cooperation

Review Panel Recommendation Number	Performance Review Panel Recommendation	Secretariat Comment	Reference Number
PR-2014-56	Given the reliance of the CCSBT, in many ways, on cooperative relationships with other RFMOs for "harmonizing" with (and using directly) a number of those neighbouring RFMOs' measures, the work called for by the Kobe process and its 2010 workshops is particularly relevant. The CCSBT should look seriously for opportunities to re-invigorate discussions among its neighbouring RFMOs to work more closely to implement the Kobe recommendations. Key areas of collaboration include: more systematic exchange of data and information (interoperable databases); additional harmonization of measures; conducting more joint scientific workshops; increasing coordination of compliance work, particularly to combat IUU fishing and conserve and manage ERS; large-scale tagging programmes; ecosystem approach implementation; large scale ecosystem-based modelling; Management Strategy Evaluation;	It was not proposed to add any item to address the first part of this recommendation	-
	.... harmonisation of MCS systems; common formats for assessing compliance (with data reporting; infringements, etc.); capacity-building (e.g. training courses); and development of common positions at IUCN, CITES, CBD, and the UNGA.	Proposed adding item 8.3x3 to address this last part of the recommendation	8.3.x3
PR-2014-57	As is noted it is Strategic Plan, the CCSBT should develop a more comprehensive strategy for addressing the capacity building needs, particularly with regard to compliance with CCSBT obligations, programs, and implementing the CDS, of developing State members/CNMs. One model to consider is that of the IOTC, which conducts compliance "missions" in country to assist developing State members in identifying areas of deficiency and in developing an action plan to improve.	Proposed amending the existing item 10.1.2 to add text regarding capacity building and compliance 'missions'.	10.1.2

Estimate of the Amount of Time Currently Spent by the Compliance Manager on Key CCSBT Activities

Activity	Activity Details	Number of Weeks	Total Percentage of Time Per Activity[1]
Meetings and Workshops (includes time at and travel time to meetings and workshops, but not meeting preparation time[2])	CCSBT Commission/ EC	1	9%
	CCSBT CC	1	
	CCSBT CCWG[3]	0.5	
	Non-CCSBT Meetings/ Workshops (related to CCSBT work)	1.5	
Meeting Papers/ Presentations (includes reading, preparing, reviewing and writing papers and presentations for all meetings/ workshops)	CCSBT Commission/ EC/ ESC meeting paper input and review	0.5	32%
	CCSBT CC	9	
	CCSBT CCWG[3]	4.5	
CCSBT WorkPlan items	Includes all research, analysis, communications, drafting, *etc* in relation to CC Workplan items not accounted for elsewhere in this table (overlaps with the Meeting Papers/ Presentations item above)	7	16%
Catch Documentation Scheme	Receiving and Organising Data	1	38%
	Posting updates (validations)	0.5	
	CDS 6 monthly/ annual reporting	1.5	
	CDS Queries	1	
	Reconciliations and Follow-Ups	10.5	
	Compliance with Measures Draft Tables for Member Review	2	
Catch Against Allocations	Monthly Catch Reporting processing and posting	0.5	2%
	Initial allocation versus final catch processing and posting	0.5	
Transhipment	Processing and checking	1	2%
Miscellaneous CCSBT Admin	Administration	0.5	1%
	TOTALS	**44[4]**	**100%**

[1] Rounded to the closest whole percentage

[2] Meeting preparation time such as preparing, reviewing, writing and presenting meeting papers is recorded as part of the 'Meeting Papers/ Presentations' activity

[3] Although a Compliance Committee Working Group (CCWG) does not occur every year, it has been included for the purpose of these estimates

[4] The total of 44 effective working weeks per annum includes allowances for annual leave and Canberra Statutory leave days