**VMS SWG Paper**

**16 July 2021**

**Introduction**

In the previous VMS SWG update paper ([CoChairs\_Mar2021](https://www.wcpfc.int/doc/cochairsmar2021/update-16-march-2021-comments-requested-13-april-2021)), the co-chairs grouped the comprehensive list of VMS data gap issues, to be considered by the SWG, into six overarching issues:

1) Disparity between CCM-held and Secretariat-held VMS data;

2) Data gaps from VMS failure;

3) CCM’s use of the VMS Reporting Status Tool (VRST);

4) ALC/MTU approval;

5) Assessing compliance with CMM 2014-02 para 9(a) VMS SSP 2.8; and

6) Review of Commission VMS.

The previous paper then tabled proposed approaches to address each issue supported by participants, as well as some new approaches that the SWG were yet to fully consider.

The purpose of this paper is to propose draft VMS SWG recommendations to TCC17, in line with the VMS SWG’s tasking from WCPFC16.

This paper provides a synthesised summary of participants’ comments on the proposed approaches for each overarching issue. Proposed approaches that did not have general agreement from most participants shall not be put forward as recommendations to TCC17. Proposed approaches that did have general agreement have been consolidated into draft recommendations.

Participants’ comments on this paper’s draft TCC recommendations will inform the finalised VMS SWG TCC17 recommendations. The co-chairs propose that these recommendations be put forward to TCC17 via a VMS SWG report. As such, the co-chairs request that participants closely review the draft recommendations. Where possible, participants are requested to focus their comments and edits to the draft TCC17 recommendation language (ideally in track changes). For ease of review, the title of each issue below is coloured **blue**, and draft TCC recommendations are colored **red**.

**Issue 1**: **Disparity between CCM-held and Secretariat-held VMS data**

In the previous update paper, the co-chairs’ proposed approach to address issue 1 was to ‘*recommend exploring ways how direct simultaneous reporting could be implemented*’. This approach is one potential solution to reducing inconsistency between CCM-held and Secretariat-held VMS data whilst not compromising the reliability and accuracy of the Commission VMS data. Utilising a single feed (with a split forwarding system from the Mobile Communication Service Provider simultaneously to the Commission VMS and flag State VMS) will likely reduce the number of discrepancies between CCM-held and Secretariat-held data.

As noted in the co-chairs’ previous update paper, a direct simultaneous reporting framework is consistent with Article 24(8) of the Convention: “*The Commission,* ***directly,******and simultaneously with the flag State where the flag State so requires****, or through such other organization designated by the Commission, shall receive information from the vessel monitoring system in accordance with the procedures adopted by the Commission.”* [emphasis added]

Some SWG participants saw value in a direct simultaneous reporting approach and suggested a scoping study/ preliminary analysis to explore how CCMs could implement this approach. However, several other participants noted cost and/or capacity concerns that would likely make implementation of this proposed approach impractical in the foreseeable future. Therefore, the proposed SWG recommendations focus on initial steps that may incrementally increase CCM capacity to do so over time.

Some SWG participants noted that they had phased out, or are in the process of phasing out, Data Network ID (DNID) based INMARSAT ALCs. This was due to various issues with these units (e.g. network issues, operating costs). Relevantly, these ALCs are also incompatible with the proposed direct simultaneous reporting. One participant noted that in their own experience, when they investigate ALCs that have stopped reporting, the vast majority of them are INMARSAT ALCs. Other participants have noted frequent ALC non-reporting when INMARSAT ALCs must report to multiple entities, such as in the WCPFC VMS framework, and that they have already phased out the use of DNID-based units to address efficiency and reporting reliability issues experienced nationally.

Therefore, the recommendation from the VMS SWG below is aimed at making direct simultaneous reporting viable for CCMs at some point in the future (noting that a direct simultaneous reporting framework is consistent with Article 24(8) of the Convention). Due to the wide deployment of these ALCs currently (see table below provided by the WCPFC Secretariat), it is anticipated that any transition should allow CCMs sufficient time (several years) to address practical near-term impediments to eventually implementing direct and simultaneous reporting.

The Secretariat has advised that, as at 16 June 2021, Inmarsat C MTUs make up 52% of the registered MTUs in WCPFC MTU Register. There are 740 Inmarsat C MTUs listed as WCPFC-Active (for direct reporting to WCPFC VMS). The breakdown by flag and by manufacturer are provided in the two tables below.

|  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **AU** | **CN** | **EU** | **FJ** | **JP** | **KR** | **NC** | **NZ** | **PA** | **TW** | **TOTAL** |
| **TOTAL "WCPFC-Active" Inmarsat C ALC/MTUs** | **36** | **72** | **17** | **1** | **352** | **3** | **4** | **2** | **20** | **233** | **740** |

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Manufacturer:** | **JUE** | **FELCOM** | **Trimble** | **Thrane and Thrane / Sailor** | **ELB [Satlink]** | **TOTAL** |
| **TOTAL "WCPFC-Active" Inmarsat C ALC/MTUs** | **80** | **293** | **3** | **356** | **8** | **740** |

**Draft TCC17 recommendations to address issue 1:**

1. *TCC17 recommends that WCPFC18 task TCC18 to further consider future work to enable direct/simultaneous VMS reporting by vessels/ALCs reporting to the WCPFC VMS.*
2. *TCC17 encourages any CCMs capable of utilising a direct/simultaneous reporting framework to consider doing so on a voluntary basis. Any such CCMs are requested to report their experiences to TCC in the future, particularly any information regarding changes in the number of discrepancies between CCM-held and Secretariat-held VMS data.*

**Issue 2. Data gaps from VMS failure**

The previous update paper proposed three approaches to data gaps arising from VMS failure:

1. The first was to ‘*recommend tasking the WCPFC Secretariat to identify (or commission external support to identify) some suggested options to…facilitate automatic integration of VMS manual reports in to the Commission VMS including the feasibility and estimated costs of the options*’
   * **There is general support from SWG participants to pursue this approach notwithstanding some participants’ concerns about costs or capacity burden on flag CCMs.**
   * **The Secretariat has provided a recent update that it is working with Trackwell to explore automated integration of VMS manual reports into the Commission VMS. It appears that the Secretariat may be prepared to discuss technical details and perhaps demonstrate options for this at or around TCC17. This could be facilitated through a short virtual meeting of the VMS SWG prior to TCC17.**
   * For now, if SWG participants agree, our informal request to the Secretariat will be to prepare a brief to the SWG (for delivery at the pre-TCC SWG virtual meeting or otherwise) that outlines:
     + feasibility;
     + necessary steps;
     + estimated costs;
     + outlook on when initial operational capability may be expected;
     + Secretariat and flag CCM capacity issues; and
     + how the Secretariat will differentiate manual and automatic position reports.

1. The second proposed approach was to *‘recommend tasking the Secretariat to conduct a feasibility study regarding the use of AIS data to supplement/ support the Commission’s VMS*’.
   * **There was no agreement amongst SWG participants to pursue this recommendation. Consequently, the SWG will not forward any AIS-related recommendation to TCC17.**
2. The third proposed approach was to ‘*recommend a change to the Commission’s VMS rules or consider options to incentivise vessels to carry a backup ALC/MTU*’.
   * **SWG participants were concerned about the costs and feasibility of vessels carrying a backup ALC/MTU. However, participants were conceptually open for TCC18 to explore non-binding options to incentivise vessels to carry a backup ALC / MTU, particularly for those vessels with regular or repeated VMS reporting issues.**

An administrative matter related to this issue, but which was not originally tasked to the VMS SWG, is the extension of the WCPFC9 adopted amendment related to the reporting timeframes for manual reporting in the event of ALC malfunction. These provisions are outlined in paragraphs 4 and 5 of Section 5 of the [VMS SSPs](https://www.wcpfc.int/doc/tcc-02/vessel-monitoring-system-standards-specifications-and-procedures-ssps) and were incrementally extended at WCPFC11, WCPFC13& WCPFC15.

Paragraph 4bis of the SSPs provides that the manual reporting standards ‘*will apply for the period 1 March 2013 to 1 March 2021 and will be reviewed for MCS effectiveness by TCC’*.

Therefore, WCPFC18 must consider this issue, including whether to approve further extension of the manual reporting standards (see specific recommendation below). Considering the likely abridged agenda of the virtual TCC17, an extension of the standards may be the most practicable approach.

**Draft TCC17 recommendations to address issue 2:**

1. *TCC17 notes the Secretariat’s progress, and recommends that WCPFC18 support the WCPFC Secretariat’s continued work to facilitate automatic integration of VMS manual reports in to the Commission VMS within their existing budget.*
2. *TCC17 recommends that potential incentives for non-binding measures, including ‘VMS best practices’ that CCMs may adopt to minimise data gaps from VMS failures be considered by TCC18.*
3. *TCC17 recommends that WCPFC18 approve extension of the WCPFC9 adopted amendments to the VMS SSPs that were previously extended (via attachment 1 of the SSPs) at WCPFC11, WCPFC13 & WCPFC15, through 1 March 2024, and that this remain in force thereafter unless the Commission directs otherwise. TCC17 also recommends that WCPFC18 task the Secretariat to update online references accordingly.*

**Issue 3. CCMs’ use of the Secretariat’s “VMS Reporting Status Tool” (“VRST”)**

The previous update paper proposed a list of options for VRST enhancements and invited participants to suggest additional options to enhance this tool. The proposed approach was to ‘*recommend that the Secretariat:*

* *Work with their VMS Service Provider (and/or others) to implement the suggested enhancements to the VRST.*
* *Work with CCMs and their Service Provider to harmonise flag CCM (and FFA) methods of automatically accounting for all vessels’ daily VMS status.*’

Additionally, the previous update paper proposed to ‘*recommend that TCC (if / after VRST enhancements are completed):*

* *Consider amending Section 5, para 4 of the VMS SSPs to operationalise use of the VRST as the Secretariat’s and flag CCMs’ primary / default method of reconciling ALC reporting status (automatically highlighting to the Secretariat and Member FMC vessels which are not reporting reliably to the Commission VMS, and if feasible to automate, to the Member FMC VMS)*
* *Consider requesting the WCPFC Secretariat and FFA Secretariat continue work to harmonise their technical and administrative methods of monitoring vessel ALC daily reporting status with a goal of automatically highlighting and triggering action by appropriate authorities when vessels should be reporting to each system, but are not*’.

**There was no SWG agreement to require the operational use of the VRST through amendments to the SSPs but participants supported progressing and improving the utility of the VRST**.

In the past few months, the Secretariat has implemented a new, interactive version of its VRST. This enhanced version not only automatically, passively notifies, on a daily basis, authorized flag CCM VMS staff of their vessels that have stopped reporting in the Commission VMS, but also displays each of their vessels’ current VTAF data (“network ID”) in the Secretariat’s database. Since this new utility is directly related to data required under VMS SSPs para 2.8, the aspects related to that are covered in more detail in Issue 5, below.

This new version of the VRST will allow authorized flag CCM VMS staff to immediately compare the status of VMS data in the Secretariat’s database with the corresponding flag CCM VTAF data. The new interactive functionality of the VRST then allows authorized flag CCM VMS staff to immediately input online and highlight to the Secretariat’s VMS staff discrepancies between flag CCM and WCPFC VMS VTAF data. **These new features should enable transparent, voluntary Secretariat / flag CCM VMS processes and coordination, and facilitate objective analysis and timely management of VMS issues.**

The new VRST also includes several of the specific enhancements that SWG members suggested previously. Therefore, the proposed recommendations for TCC17 on this issue no longer include those enhancements.

The Secretariat has agreed to organize a virtual meeting with the SWG sometime prior to TCC17 during which they will demonstrate the new VRST capabilities, and SWG members may ask questions or discuss specific details at that time. (Note – if agreed, this virtual meeting could also include discussion of manual report automation options discussed in Issue 2 above).

The Secretariat, in close coordination with the SWG co-chairs, has also provided draft updates of its VMS Standard Operating Procedures (SOPs) that may be considered by TCC17. The draft SOPs may, among other benefits, clarify VRST features and processes, and will be circulated to SWG members with this paper for their review/input.

**Draft TCC17 recommendations to address issue 3:**

1. *TCC17 recommends that WCPFC18 adopt the draft VMS SOPs in order to accurately reflect recent changes in technology and technical processes. TCC17 also notes that the new SOPs are also expected to greatly benefit (and reflect) other VMS technical work[[1]](#footnote-1) undertaken by the Secretariat and VMS SWG to address VMS data gaps.*

**Issue 4. ALC/MTU Approval**

In the previous update paper, the co-chairs proposed recommending TCC17 delist the ORBCOMM ST6100 and SKYWAVE IDP-690 MTU units. **There was no consensus amongst SWG participants to delist these units.**

One participant noted that position reports from the SKYWAVE IDP-690 units on board their flagged vessels have been received by the Secretariat. Another participant noted that there appears to be a need for improved flag CCM (and potentially Secretariat) engagement with the service providers to facilitate establishing a gateway for the units, as opposed to technical issues/limitations with the units themselves.

The co-chairs propose that, prior to TCC17, any CCMs that currently use ORBCOMM ST6100 or SKYWAVE IDP-690 MTU units share information with the VMS SWG regarding the steps it has taken to facilitate effective reporting to the Commission VMS.

The Secretariat has advised that as at 16 June, an interim arrangement is in place facilitated by Chinese Taipei to receive VMS data from 32 Chinese-Taipei vessels are equipped with Skywave MTUs that are considered “WCPFC-Active” (and a further 4 vessels are equipped with Skywave IDP-900 MTUs that are “FFA-Active”). Australia also has a small number of vessels equipped with Skywave MTU and has indicated that it can provide a detailed update to the VMS SWG prior to TCC17 (regarding how its ALCs are able to effectively report to the Commission VMS).

The co-chairs have previously noted that paragraph 2.7 of the VMS SSPs already outlines steps for ensuring an MTU/ALC ‘*has the ability to successfully report to the Commission VMS’*, and specifically includes reference to the FFA methodology for type approval*.* **However, some participants suggested that the steps for ensuring an ALC/MTU ‘*has the ability to successfully report to the Commission VMS’* could be further clarified and defined, perhaps using a checklist similar to the FFA Secretariat’s checklist.**

**Draft TCC17 recommendations to address issue 4:**

1. TCC17 requests that, not later than 30 days prior to WCPFC18, any CCMs currently using ORBCOMM ST6100 and SKYWAVE IDP-690 MTU units to share, via email to the VMS SWG co-chairs, information regarding the specific steps it has taken, including engagement with the Secretariat, to facilitate the ALCs effectively reporting to the Commission VMS.
2. *TCC17 notes that the Secretariat, in close coordination with the VMS SWG co-chairs, has developed and provided new draft VMS SOPs for consideration and adoption by WCPFC18. This document includes details on the standard processes used to assess the ability of an MTU/ALC and its communication / satellite service provider / gateway to successfully report to the Commission VMS.*
3. *TCC17 also notes that the draft VMS SOPs outline in greater detail how the VMS Manager will work with relevant vendors and CCMs to assess proposals for inclusion of additional MTU/ALC units and their communication / satellite service provider / gateway, against the new MTU/ALC type approval checklist, and how the Secretariat shall provide this information to CCMs, along with any other documentation provided by the flag CCM or vendor, to better inform their consideration of any units proposed for listing or delisting.*

**Issue 5. Assessing compliance with CMM 2014-02 para 9(a), VMS SSP 2.8**

In the previous update paper, the co-chairs proposed three broad options to address this issue. Participants provided feedback on the following three proposed options:

1. Support ways to enhance the Secretariat’s administrative processes and facilitate a more transparent process;
2. Amend the obligation; and
3. Develop audit points to assess compliance with the obligation.

**There was no agreement amongst SWG participants to amend the obligation but there is a clear need to clarify the process at the Secretariat, flag CCM and TCC level.**

During the course of the SWG’s work, it became clear that the challenge with assessing flag CCMs’ compliance with VMS-related obligations is broader than just one element (SSPs 2.8). Consequently, the co-chairs considered a range of inputs from various SWG members to try to streamline TCC’s long-standing challenge assessing CCMs’ compliance with the various VMS requirements.

The requirement in SSPs 2.8 that each flag CCM, for each of its vessels, provide the Secretariat “all necessary data to complete its data file in the Commission’s VMS database” is clear. The new version of the VRST now allows all flag CCMs and the Secretariat to continuously monitor and immediately determine the flag CCM’s (and their vessels’) compliance at any given time, and easily share status updates in a single online interface. For example, the flag CCM VMS POC (or authorized designee) and/or the Secretariat can view the “Active VTAF with WCPFC” column of the VRST, check for any “No” entries, and easily determine vessel-level VTAF-submitted status. This can now literally be completed within a few seconds’ time with three mouse clicks on a Wi-Fi internet enabled device. As noted in the draft “*VMS template for TCC17 to consider recommending to WCPFC18 as a new annex to CMM 2014-02”* (below), assessing a flag CCM’s compliance with SSPs 2.8 could now be automated.

Similarly, the challenge with assessing flag CCMs’ compliance with para 9a of CMM 2014-02 (that ALCs “meet Commission requirements”) may be greatly facilitated and substantially streamlined by flag CCMs and the Secretariat reliably using the new interactive VRST facility as outlined in the draft “VMS template…” below.

The other traditionally difficult and time-consuming assessment of flag CCMs’ adherence to the timeline and process for responsibly managing ALC failures (CMM 2014-02 9a and VMS SSPs 5.4 – 5.5), could also be substantially improved by reliable use of the new interactive VRST facility as outlined below (and in the draft VMS SOPs).

At the flag CCM level, some participants suggested exploring options to submit and process VTAFs electronically to reduce possible data inputting errors. The co-chairs have also sought advice from the Secretariat about what further information flag CCMs could provide to clarify the steps and processes they have in place to meet their VMS obligations (all VMS obligations in addition to CMM 2014-02 para 9(a), VMS SSP 2.8). The Secretariat has suggested a VMS reporting template for CCMs to respond to in their annual Part 2 Report. This may improve flag CCMs ability to verify that they are meeting their VMS obligations, while potentially streamlining the VMS portion of the CMR process.

**The co-chairs have drafted a reporting template (attached below) and encourage participants’ comments and suggestions on this proposed approach.**

The development of audit points is a related body of work that will assist TCC in objectively assessing the information CCMs provide to confirm that they have met their VMS obligations. Some VMS SWG participants suggested options for potential audit points for VMS obligations. One option considered was a score-based system to reflect degrees of relative flag CCM compliance rather than the current “pass/fail” framework that routinely frustrates TCC in vessel-level VMS details. The advent of recent automation work (notably, the enhanced VRST) may allow TCC to consider such a framework in the foreseeable future. However, in the meantime, the co-chairs suggest that any further work in this area be completed in the future broader-level audit points development.

**Draft TCC recommendations to address issue 5:**

1. *TCC17 recommends WCPFC18 task the Secretariat to provide a report to TCC18 with suggested options and, if practical, an estimated timeline to facilitate electronic (online) submission and processing of new and updated VTAFs, and transparently (with the relevant flag CCM) tracking progress.*
2. *TCC17 recommends that WCPFC18 approve the streamlined VMS reporting template below as Annex 2 of CMM 2014-02 for use in CCM’s annual Part 2 Report submissions beginning with TCC18.*

**Issue 6. Review of Commission VMS**

In the previous update paper, the co-chairs proposed two approaches to review the Commission VMS. The first proposed approach was a Secretariat-focused approach, to ‘*recommend the WCPFC Secretariat consider including the following issues in its VMS Annual Report:*

* *Whether this problem appears to be specific to, or more prevalent with, particular MTU types?*
* *Whether there appears to be a relationship between how often MTUs are audited by flag CCMs and the flag CCM’s VMS data reliability?*
* *Whether there are any trends that can be observed in the completeness of the Secretariat’s records of WCPFC VMS reporting due to the implementation of the annual processes under the Compliance Monitoring Scheme (e.g., the pre-CMR and/or post-CMR percentage of flag CCM’s VMS days not reporting to the WCPFC VMS)?*
* *Whether other service providers could address this issue and information on how other RFMOs deal with this problem?*
* *Whether there are any differences between FFA VMS and WCPFC VMS in terms of frequency of VMS data gaps, and in terms of technical/operational aspects?*’

**There was general support from participants for the Secretariat to provide more information and analysis of possible causes/ trends related to VMS data gaps in the Secretariat’s VMS Annual Report.** Participants also suggested the Secretariat provide information on other core issues not strictly related to data gaps, such as, challenges the Secretariat faces while handling VMS matters (e.g. manpower, budget, or relevant agreements with other parties) and any opportunities/options to address these challenges. The co-chairs are hopeful that Secretariat-focused “Draft TCC recommendations to address issue 5” may help TCC18 develop any required additional analysis and content in the VMS Annual report.

The second proposed approach was a more holistic approach to ‘*recommend that the Commission VMS be audited, with a focus on potential VMS data gaps, once any agreed SWG recommendations have had sufficient time to be implemented (e.g. 1-2 years after the recommendations are adopted).*’

**There was no consensus by participants at this time to support evaluating the implementation of the VMS SWG recommendations and determining whether the recommendations have successfully reduced data gaps in the Commission VMS**.

It is possible that participants’ views on this may change after any recommendations supported by TCC17 and adopted at WCPFC18 are implemented. This may also narrow the focus on remaining contributors to VMS data gaps. If so, such an audit after the recommendations are implemented may assist to:

1. determine if the recommendations were effectively implemented;
2. determine whether the recommendations have minimised persistent VMS data gaps in the Commission VMS; and
3. evaluate the process of VMS operation more broadly, including the operating procedures, data confidentiality and potential challenges etc.

**Draft TCC recommendations to address issue 6:**

*11. TCC17 recommends that WCPFC18 task the Secretariat to provide further information in the VMS Annual Report to TCC18 on the status of implementing VMS SWG recommendations.*

*Draft VMS template for TCC17 to consider recommending to WCPFC18 as a new annex to CMM 2014-02*

*Annex2: Template for reporting implementation of this CMM. Each CCM shall include the following information in Part 2 of its annual report:*

|  |  |  |
| --- | --- | --- |
| CMM paragraph | Brief description | Annual Reporting list/question |
| **CMM 2014-02 04** | Vessels shall continue to report to Commission VMS after moving into Northern Quadrant | AR Pt 2 (prior year implementation) PR-045 |
| **CMM 2014-02 9a** | Fishing vessels comply with the Commission standards for WCPFC VMS including being fitted with ALC/MTU that meet Commission requirements[[2]](#footnote-2) | AR Pt 2 (prior year implementation) PR-046  (Proposed NEW): “What checks and procedures do flag CCMs presently use to check that all vessels that are “fishing in the Convention Area beyond their area under national jurisdiction” are successfully / reliably reporting to WCPFC VMS?”  “What actions do flag CCMs undertake, when vessels that are “fishing in the Convention Area beyond their area under national jurisdiction” unexpectedly stop reporting to the Commission VMS?”  “What, if any, deadlines are imposed by flag CCMs on vessels that are “fishing in the Convention Area beyond their area under national jurisdiction” and unexpectedly stop reporting to the Commission VMS?”  What, if any, measures are taken by flag CCMs against vessels that are “fishing in the Convention Area beyond their area under national jurisdiction” and stop reporting to the Commission VMS and then fail to properly respond by a deadline imposed by the flag CCM?”  “What process or method(s) do flag CCMs utilize to determine if vessels that are authorised to “fish in the Convention Area beyond their area under national jurisdiction” intend to report to the Commission VMS via the FFA VMS or directly?”  “What process or method(s) do flag CCMs utilize to determine if vessels that are authorised to “fish in the Convention Area beyond their area under national jurisdiction” and that report to the Commission VMS via the FFA VMS remain in Good Standing throughout their authorization period?” |
| **CMM 2014-02 9a VMS SSPs 2.8** | Provision of current[[3]](#footnote-3) ALC/MTU 'VTAF' data | AR Pt 2 (prior year implementation) PR-047 |
| **CMM 2014-02 9a VMS SSPs 5.4 - 5.5** | VMS Manual Reporting procedures - applies until 1 March 2021 | AR Pt 2 (prior year implementation) PR-048 |
| **CMM 2014-02 9a VMS SSPs 7.2.4** | Protocol for inspecting CCMs to inspect ALCs/MTU of other CCMs vessels at sea, includes reporting requirements for inspecting CCMs | AR Pt 2 (prior year implementation) PR-049 |
| **CMM 2014-02 9a VMS SSPs 7.2.5** | Report to Secretariat any ALC/MTU, and associated details, that appear to not be in compliance with applicable CMMs related to VMS reporting | AR Pt 2 (prior year implementation) PR-050 |
| **CMM 2014-02 9a VMS SSPs 7.2.2** | CCMs to conduct periodic audits of ALC/MTUs of its vessels and report results to the Commission (AR Pt 2) | Reporting checklist in AR Pt 2 (2020 Specific)  (Proposed NEW): “What checks and procedures do flag CCMs presently use to inspect ALC/MTUs of its vessels that are authorised to “fish in the Convention Area beyond their area under national jurisdiction”?”  “On what basis (e.g., under certain circumstances as they may occur, based on the vessel’s fisheries compliance behaviour, randomly, etc.) do flag CCMs schedule audits of ALC/MTUs?” |

1. This specifically supports related recommendations made in three of the six issues that the VMS SWG has tried to improve (#3 here, plus #4 and #5 below). [↑](#footnote-ref-1)
2. Determination of CCMs’ compliance with this item can be streamlined if 1) CCMs monitor and update their vessel’s status (e.g., “In Port”, “Out of Convention Area”, “Manual Reporting”, “new VTAF data submitted to Secretariat”, etc.) using the new interactive utility in the VRST at least every 14 days, and 2) the Secretariat updates all vessels’ VTAF submission status on a daily basis as outlined in the draft revised VMS SOPs. In that case, CCMs may simply refer to their VRST review/update process in response to relevant AR Pt 2 questions. [↑](#footnote-ref-2)
3. Determination of CCMs’ compliance with this requirement can now be automated via the VRST if 1) CCMs monitor and update their vessel’s status (e.g., “In Port”, “Out of Convention Area”, “Manual Reporting”, “new VTAF data submitted to Secretariat”, etc.) using the interactive utility in the VRST at least every 14 days, and 2) the Secretariat updates all vessel’s VTAF submission status on a daily basis as outlined in the draft revised VMS SOPs. [↑](#footnote-ref-3)