

**Letter from the COC Chair on 2022 annual meeting of the  
Conservation and Management Measures Compliance Committee**  
(ICCAT Circular 8653/22)

21 October 2022

**SUBJECT: 2022 ANNUAL MEETING OF THE CONSERVATION AND MANAGEMENT MEASURES  
COMPLIANCE COMMITTEE**

Dear Distinguished Delegates and Observers,

I am looking forward to working with all participants at the 2022 meeting of the ICCAT Compliance Committee (COC).

To ensure our discussions are constructive and efficient, I would like to take this opportunity to inform the Commission about how I intend to structure the meeting, subject to further input from CPCs and adoption of the [tentative agenda](#) (attached). I would also like to provide additional information relevant to certain agenda items, to ensure that all CPCs submit and review relevant information in advance and come prepared to actively engage in the COC discussions.

*Request for advance input on potential compliance issues*

To facilitate a fulsome discussion during the CPC by CPC compliance review, I strongly encourage CPCs to review the Annual Reports and other compliance-related documentation of other CPCs now posted on the [ICCAT 2022 COC meeting document site](#), and to submit any questions or concerns regarding potential non-compliance to me in writing no later than **Friday, 4 November 2022**. I will in turn consider this input as I develop a list of additional matters for discussion during the CPC by CPC review.

Additionally, pursuant to paragraph 2 of *Resolution by ICCAT to facilitate an effective and efficient compliance process (Res. 16-22)*, I am working with the Secretariat to develop and circulate the first draft of the Compliance Summary Tables [COC-308/2022] on or around 26 October 2022, three weeks prior to the first COC session, after which point CPCs are invited to submit "initial, written explanations of inaccuracies or additional information to the Secretariat on their own compliance information as reflected in the Draft Summary Compliance Tables and any supplementary tables at least five days before the start of the first session of the COC" (Friday, 11 November 2022).

*Annual Report and other submissions*

First, I would like to commend CPCs that submitted Annual Reports via the new online system. Nevertheless, as of the date of this letter, a number of CPCs have not submitted certain required data, reports, or other documents, such as Part I or Part II of the Annual Report, compliance tables, or Task 1 and Task 2 data. Lack of timely reporting undermines ICCAT's ability to carry out its mandate and the COC's ability to assess compliance. In the case of a number of CPCs, failure to submit these documents by the deadline (or at all) is a recurring issue. In order to address this matter, I intend to recommend that the COC consider taking proportionate responsive actions at the 2022 meeting in the case of CPCs that repeatedly fail in this respect, including possible identification under *Recommendation by ICCAT concerning Trade Measures (Rec. 06-13)*. Missing information will be noted in the draft version of COC-308, as indicated above. Guidelines for Submitting Information and Data Required by ICCAT are available at: <https://www.iccat.int/en/SubmitCOMP.html> and <https://www.iccat.int/en/submitSTAT.html>.

Additionally, a number of CPCs that received a letter of identification or on compliance issues from the COC Chair following the 2021 meeting, to which a response was requested by 1 October 2022, have not yet provided a written response. Written CPC responses are essential for the Commission to conduct a meaningful review of actions taken by CPCs to address compliance issues identified by the Commission. I encourage those CPCs that have not already responded to provide a written response as soon as possible in advance of the 2022 Commission meeting. At this meeting, I would like COC to devote more time to the response letters to assess the sufficiency of each response, and to discuss ways to better track CPC response actions over time. To this end, CPC's are encouraged to review response letters and consider including observations on these in their input to the COC in the advance input on other CPC's that I've requested by 4 November 2022, above, pursuant to [Res. 16-22](#). CPC response letters received to date are posted [here](#), and the original outgoing letters from the COC Chair are posted [here](#) (non-CPC correspondence can be found in "Correspondence with non-CPCs" following 2021 COC meeting, COC-310/21).

#### *Friends of the Chair Group*

This very useful process was formalized in [Res. 16-22](#). Thank you to those delegations that represented their geographical area in this Group. If there are any changes to CPCs representing these areas, please inform me and the Secretariat prior to the first COC session. I will be in touch with these representatives to discuss my proposed work plan for this Group in more detail, including the possibility of a virtual meeting prior to the Annual Meeting.

#### *Compliance Table submission, review, and formatting*

In accordance with *Recommendation by ICCAT to clarify the application of compliance recommendations and for developing the compliance annex* ([Rec. 11-11](#)) as amended by *Recommendation by ICCAT to amend ICCAT reporting deadlines in order to facilitate an effective and efficient compliance process* ([Rec. 16-16](#)), the deadline for submitting compliance tables to the Secretariat was 15 August 2022. Any changes to the compliance tables to reflect updated information must be submitted in writing to the Secretariat **before Monday, 14 November 2022 at 18:00** and in no case later than the start of the first session of the Compliance Committee. Unfortunately, last year the COC was faced with the submission of numerous changes to the compliance tables throughout the week of the meeting, which was very disruptive to the COC's work. I do not intend to recommend that the Secretariat shows the same leniency this year in accepting late updates.

#### *Further implementation of the ICCAT Schedule of Actions (Res. 16-17)*

At the 2021 Commission meeting, the "Working Paper on Draft Schedule of Actions: Severity of Types of Non-Compliance with Specific ICCAT Provisions" was presented in furtherance of [Res. 16-17](#), which called on ICCAT to develop such a reference document. We had a good initial discussion, and I would like to thank the delegations that submitted written input at the meeting and earlier this year in response to circular 5481/22. In light of the mandate in *Resolution by ICCAT establishing an ICCAT schedule of actions to improve compliance and cooperation with ICCAT measures* ([Res. 16-17](#)) and the depth of deliberations we've had to date on this matter, I intend to prioritize this document with a view to advancing it to the Commission for adoption at the 2022 meeting. To that end, in the coming days I intend to post a revised Chair's version that takes into account input received from CPC's to date. I encourage all CPC's to devote time in advance of the Annual Meeting to review this document so we are in a good position to engage on and conclude this effort. With the aid of this non-binding guidance, the Compliance Committee will be better positioned to take appropriate actions to address compliance issues and improve compliance with ICCAT requirements.

*Other priority matters*

At the 2021 COC meeting, work continued on elaborating a Strategic Plan for the Review of Compliance Priorities that had been initiated in 2019 based on suggestions of CPC's. For 2022, priorities suggested included:

- Expiring Recommendations, and/or stocks assessed in 2022, as appropriate [Secretariat TBA]
- Review of implementation of *Recommendation by ICCAT to establish minimum standards for fishing vessel scientific observer programs (Rec. 16-14)* on Scientific Observer Coverage [USA: Rec. 16-14 (on minimum standards for scientific observer coverage) was scheduled for review by the Commission in 2019, but that review was delayed due to other pressing business in 2019 and then the pandemic. A focused look at CPCs' implementation may help to inform future review of this measure]

I suggest that we take this input into account as we set priorities for this meeting. If CPCs have recommendations on other areas for the COC to prioritize, I welcome that input as far in advance of the meeting as possible. I also look forward to input on prioritization from the Friends of the Chair representatives. I am hopeful that the new IOMS reporting format can be effectively utilized for at least some measures at this meeting to generate accessible reports on how all CPC's have reported in certain areas.

*Expert Group Report: Approaches to Evaluate and Strengthen RFMO Compliance Processes and Performance - A Toolkit and Recommendations*

In advance of the 2022 meeting, I would like to draw COC members' attention to COC-313/2022, [Expert Group Report: Approaches to Evaluate and Strengthen RFMO Compliance Processes and Performance - A Toolkit and Recommendations](#), published along with an [Executive Summary](#) as COC-313. This Group was convened by Pew and ISSF and includes experts with a wide range of backgrounds, including individuals that work in RFMO member governments and that have had leadership positions in RFMO's. The group's work both takes into account innovations on compliance issues developed by ICCAT and contains recommendations that I think could be considered by ICCAT as constantly seeks to improve its compliance process. I intended to propose an agenda item devoted to this report, and encourage CPC's to review it in advance of the meeting and come prepared to discuss the recommendations and whether any should be explored by ICCAT for implementation.

Please accept the assurances of my highest consideration.



Derek Campbell  
*Compliance Committee Chair*

**Attachment:** Tentative Agenda [COC-300/2022]

**Tentative Agenda of the  
Conservation and Management Measures Compliance Committee (COC)**

1. Opening of the meeting
2. Appointment of Rapporteur
3. Adoption of the Agenda
4. Review of progress on follow up on the Second Performance Review and consideration of any necessary actions.
5. Review of Secretariat Report to the Compliance Committee
6. Priority review of other Recommendations, taking into account the schedule of expiration of Recommendations and, where possible, the schedule of SCRS assessments, as appropriate (pursuant to Strategic Plan for Review of Compliance Priorities, Appendix 5 to ANNEX 9 of 2019 Annual Meeting Report)
7. Review of response to Chair's letters arising from the 2021 meeting
8. Compliance Tables
9. Review of other relevant information, including submissions under Rec. 08-09
10. Review of CPC implementation of and compliance with ICCAT requirements, focusing on priority issues and/or cases
11. Review of information relating to Non-CPCs
12. Determination of recommended actions to address issues of non-compliance by CPCs and issues relating to NCPs arising from items 10 and 11
  - a) Endorsement of Compliance Annex
  - b) Identifications or other actions under the trade measures recommendation (Rec. 06-13)
  - c) Action under data recommendations (Recs. 05-09 and 11-15)
  - d) Any other actions
13. Consideration of requests for cooperating status
14. Review of progress made by the online reporting working group and next steps
15. Other recommendations to the Commission to improve compliance, including consideration of a schedule of actions for future application based on Res. 16-17
16. Other matters
17. Adoption of report and adjournment