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## 13<sup>TH</sup> MEETING OF THE COMPLIANCE AND TECHNICAL COMMITTEE (CTC)

*Panama City, Panama 24-27 February 2026*

### CTC 13 – Doc 09 SPRFMO Observer Programme Implementation Report

*Secretariat*

#### 1. Summary and recommendations

During 2025, four Members (Cook Islands, Ecuador, Panama, and the Russian Federation) had their Observer Programmes (OP) assessed by the Accreditation Evaluators.

In the Final Evaluation Report, the Accreditation Evaluators provided their findings whether the Members demonstrated that their Observer Programmes meet the minimum standards for each of the 13 established evaluation criteria (each criterion is assigned a PASS or FAIL).

The Observer Programmes of the Cook Islands, Panama, and the Russian Federation achieved a PASS for all 13 criteria whereas insufficient evidence was provided regarding the Observer Programme of the Republic of Ecuador to achieve a PASS for all criteria. The four Final Evaluation Reports are attached.

The CTC is invited to:

- *Note the contents of this paper and make any comments it deems appropriate;*
- *Assess the Final Evaluation Reports for the Cook Islands, Ecuador, Panama, and Russia; and*
- *Recommend to the Commission whether these Observer Programmes have met the requirements of CMM 16-2025 (Observer Programme) and, where relevant, whether a recommendation based on paragraphs 35 to 39 is appropriate.*

#### 2. Background

Paragraph 48 of Conservation and Management Measure 16-2025 (Observer Programme) requires that the Secretariat prepares a report on the implementation of the SPRFMO OP for presentation at each annual meeting of the CTC, using information from annual reports, observer data, and all other suitably documented and relevant information in its possession.

The SPRFMO OP Implementation Report will address, *inter alia*, any:

- (1) information on problems that have been encountered;
- (2) recommendations for improving current standards and practices;
- (3) developments in Observer Programmes and observational methods;
- (4) constraints to accreditation, and
- (5) generally any identifiable problem or obstacle in fulfilling the objectives and purpose of CMM 16.

This document summarises observer related observations during 2025 relevant to the prescribed categories.



### 3. CMM reporting requirements

#### 3.1 Information on problems that have been encountered

During the 2024 CTC11 meeting Russia expressed the impossibility for its Observer Programme to be assessed by the current observer accreditation provider and asked the CTC to consider the circumstances and recommend that the Commission seek an alternative provider. The issue was resolved during 2025 by contracting the services of Independent Consultant Teresa Athayde. During the period August through November 2025 Teresa Athayde evaluated the Russian Federation's Observer Programme against the 13 established accreditation criteria and prepared the Final Evaluation Report (Annex 4) indicating that a PASS had been achieved for all criteria.

#### 3.2 Recommendations for improving current standards and practices

During 2024, COMM12 created a Working Group on Electronic Monitoring Standards. One of the open questions that this working Group is considering was: *How do we envision EM in SPRFMO will relate to the observer program and data standards?* The SC13 Final Report (Paragraph 74) identifies that the SC agreed to focus the efforts of the WGEMS on the squid jigging activity in the short term, noting that the requirements for other gear types can be determined later as needed. The SC agreed that due to requirements for increased observer coverage in the jumbo flying squid fishery, as mandated in CMM 18-2025, the focus on EMS for this fishery is the primary need for Members at this stage. The squid jigging fishery is also the only fishery for which EM will be able to substitute for human observers at this time.

At SC13 ACAP presented a paper (SC13-Obs01) highlighting that the SPRFMO Convention Area was extremely important to seabirds, with 24 of the 31 ACAP-listed Albatross and Petrel species occurring in the area. Most of these species are threatened with extinction, and the latest data shows that the population trend of at least 14 species is in decline. ACAP has updated its mitigation advice for demersal longline and trawl fisheries to reaffirm the importance of integrated strategies. ACAP advised that complementary guidelines for Observer Programmes, Electronic Monitoring, and species identification are available. ACAP welcomed the collaboration with New Zealand, Peru and Chile to review the SPRFMO seabird and data CMMs against ACAP advice (SC13-DW08).

CMM 12-2024 (Transshipment and Other Transfer Activity) entered into force on 1 October 2025 and requires receiving fishing vessels (carrier/reefer vessels) that engage in transhipment at sea to always have an observer on board (albeit not required to be from an accredited OP) when engaged in transhipping activities to monitor, record and report the relevant information for every transhipment. This is a new activity anticipated to significantly increase the amount of observer data reported to the Secretariat, in addition to high volumes of transhipment reporting. Transhipment and related observer reporting is therefore one of the focus areas of the Secretariat (Data Manager), in conjunction with the Data Working Group, and the Database Service Provider are exploring enhancements and efficiencies to facilitate and automate reporting.

#### 3.3 Developments in Observer Programmes and observational methods

The 11<sup>th</sup> International Fisheries Observer and Monitoring Conference (IFOMC) was held 19-23 May 2025 in Reykjavik, Iceland and involved 225 participants from 34 countries. The overarching vision of this conference series was to develop, promote and enhance effective fishery monitoring programs to ensure sustainable resource management throughout the world. The [conference proceedings](#) are available online. The Secretariat did not participate at this conference but sees a value in continuing participation in future conferences. The 12th International Fisheries Observer and Monitoring Conference will be hosted by Undersecretariat for Fisheries and Aquaculture in Chile in 2028.



### 3.4 Accreditation process in 2025

In response to correspondence (G37-2025 - 15 April 2025) sent out by the Secretariat, indications of interest to seek accreditation were received from the Cook Islands, Ecuador, Panama, and Russia.

MRAG engaged in the assessment of the Observer Programmes for the Cook Islands, Ecuador, and Panama whereas Individual Consultant Teresa ATHAYDE undertook the assessment of the Observer Programme for the Russian Federation. The Final Evaluation Reports received from the Accreditation Evaluators are annexed to this report.

MRAG fully assessed 2 programmes but advised that there were insufficient documentation, information, or evidence provided to fully assess all criteria for the 3rd programme. MRAG was therefore unable to determine that the programme met the minimum standard for accreditation.

The recommendations resulting from the Final Evaluation Reports are as follows:

- **COOK ISLANDS – Recommendation for accreditation**

- Documents, information, and other evidence were provided to demonstrate meeting all the accreditation requirement criteria.
- The evaluator assigned a “PASS” for each of the 13 accreditation requirement criteria indicating that no issues were identified that prevented the Member’s Observer Programme from meeting the minimum standard for accreditation (Annex 1)

- **ECUADOR – Unable to recommend accreditation**

- While documents, information, and other evidence were provided to the Accreditation Evaluators, it was deemed by the assessor that it was lacking in some key information specific to the SPRFMO requirements.
- The evaluator assigned a “full pass” to 5 of the 13 accreditation requirement criteria and a “partial pass” for three other criteria. The assessor identified a “Fail” for 5 remaining criteria.
- Based on the information provided the assessor did not recommend this Programme for accreditation under SPRFMO Observer Scheme and recommended they continue to develop it to bring it into line with the requirements of SPRFMO (Annex 2).

- **PANAMA – Recommendation for accreditation**

- Documents, information, and other evidence were provided to demonstrate meeting all the accreditation requirement criteria.
- The evaluator assigned a “PASS” for each of the 13 accreditation requirement criteria indicating that no issues were identified that prevented the Member’s Observer Programme from meeting the minimum standard for accreditation (Annex 3).

- **RUSSIAN FEDERATION – Recommendation for accreditation**

- Documents, information, and other evidence were provided to demonstrate meeting all the accreditation requirement criteria.
- The evaluator assigned a “PASS” for each of the 13 accreditation requirement criteria indicating that no issues were identified that prevented the Member’s Observer Programme from meeting the minimum standard for accreditation (Annex 4).



### 3.5 Constraints to accreditation

Funding:

As noted in paragraph 30-31 of the [CTC 12 Final Report](#) the EU extended the term of their grant to include 2025 and the CTC encouraged Members to pursue accreditation within 2025 while the EU grant could still be utilized.

From 2026 onwards there is no identified grant or voluntary contribution identified to cover costs associated with Member Observer Program Accreditation or subsequent renewals. As per paragraph 23 of [CMM 16-2025](#) (Observer Programme), the SPRFMO Observer Programme Accreditation Evaluator will then be resourced from the Commission budget.

### 3.6 Any identifiable problem or obstacle in fulfilling the objectives and purpose of this CMM

Objective:

1. This CMM establishes the standards, rules and procedures to establish the SPRFMO OP and to ensure it achieves the objectives specified in Article 28 of [the Convention](#).

Purpose:

2. The purpose of the SPRFMO OP is to facilitate the collection of verified scientific data and additional information related to fishing activities in the Convention Area and its impacts on the ecosystem, and also to support the functions of the Commission and its subsidiary bodies, including the CTC.

There is nothing to report from 2025 under this section.

### 3.7 Potential challenges and considerations for the future of the SPRFMO Observer Programme

#### a. Timeliness of Observer data submission

CMM 02-2025 (Data Standards) Paragraph 2 c (Observer Data Provision) directs that Observer data should be provided to the Secretariat of the SPRFMO in a standardised format, to be included in the SPRFMO Observer Database. Specifications and standards for observer data submissions are on the SPRFMO website. Observer data shall be submitted in Microsoft Excel format, or in such other machine-readable format as the Secretariat may prescribe following consultation with the Scientific Committee. Members and CNCPs will provide by 30 June, their previous year (January to December) data. In exceptional cases, and only where a written request is submitted to the Secretariat by 30 June explaining the need for an extension, the deadline will be extended to 30 September.

CMM 12-2024 (Transhipment) Paragraph 10 states in part that the observer shall complete the Observer Transhipment Log sheet in Annex 2 and provide this information to the competent authorities of the observed receiving fishing vessel and the Secretariat electronically no later than 30 days from debarkation.

Currently most at-sea transhipments involve jumbo flying squid and there are a considerable number of transhipments each year. A possible discrepancy is foreseen between the observer data submission deadlines whereby reports of transhipment observer reports under CMM 12 may be later than the deadlines in CMM 02 if observers are at sea for exceptionally long duration. Additionally, without knowing the duration of transhipment observer deployments, there could potentially be a (significant) gap between data collection onboard the vessel and data submission to the Secretariat, making it challenging to integrate and reconcile observer data with transhipment data on a timely basis. The extent to which there may be issues in this respect should be more apparent following the initial years of transhipment reporting.



**b. National programmes accredited under the SPRFMO Observer Programme**

Table 1 provides the status of Accreditation of National Observer Programmes, future accreditation plans, and accreditation renewal year. Initial accreditation is 5 years from the date the accreditation was granted. However, as per paragraph 36, for Members whose programmes were granted accreditation by the Commission by the close of its 12th Meeting, the accreditation shall have an automatic extension of 3 years. Therefore, the first accreditation renewals (for those granted accreditation in 2021) will need to be approved at the 2029 annual meeting (reference information in the table for sequencing of renewals).

**Table 1: SPRFMO Observer Programmes Accreditation Status and anticipated timelines**

Accreditation Status	Member/CNCP Initial Accreditation (annual meeting year)	Member/CNCP Accreditation Renewal required (annual meeting year)
Currently accredited	2021: Australia, Chile, New Zealand 2022: Korea, Chinese Taipei 2023: China, CapMarine 2024: European Union	2029: Australia, Chile, New Zealand 2030: Korea, Chinese Taipei 2031: China, CapMarine 2032: European Union
Accreditation in progress (2026)	Cook Islands, Ecuador, Panama, and Russian Federation	5 years from the date upon which accreditation is granted
Seeking Accreditation in 2026/27	Belize, Peru (tbc)	5 years from the date upon which accreditation is granted
No current plans to pursue accreditation	Cuba, Curaçao, Liberia, Faroe Islands, United States of America, Vanuatu	Not Applicable

**4. List of Annexes**

Annex 1 – MRAG Final Evaluation Report – Cook Islands

Annex 2 – MRAG Final Evaluation Report – Ecuador

Annex 3 – MRAG Final Evaluation Report – Panama

Annex 4 – T. ATHAYDE Final Evaluation Report – Russian Federation



# **SPRFMO Observer Programme Accreditation Assessment**



## **Cook Islands Final Evaluation Report 31<sup>st</sup> December 2025**



**MRAG**



**MRAG Ltd** is an independent fisheries and aquatic resource consulting firm dedicated to the sustainable use of natural resources through sound, integrated management practices and policies.

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## Introduction

The Cook Islands has an Exclusive Economic Zone (EEZ) that stretches over two million square kilometres of the South Pacific Ocean. Cook Islands' flagged fishing vessels and foreign flagged fishing vessels operate under licence within their EEZ targeting highly migratory species such as skipjack tuna, yellowfin tuna, bigeye tuna and albacore. The main fishing methods are longline and purse seine.

Cook Islands' flagged fishing vessels also operate outside of their EEZ, fishing on the high seas under authorisation in internationally managed fisheries, including those governed by the Western and Central Pacific Fisheries Commission (WCPFC), the Southern Indian Ocean Fisheries Agreement (SIOFA) and the South Pacific Regional Fisheries Management Organisation (SPRFMO). The Cook Islands have been active in SPRFMO since 2019, following the approval of their initial Fisheries Operations Plan and the subsequent CMM. The main fishing method used by the Cook Islands in SPRFMO has traditionally been potting (trapping) targeting rock lobster (*Jasus caveorum*) and crab (*Chaceon* sp.). More recently, in 2024, a second exploratory fishery was approved, using droplines and/or jigging, for hapuka (*Polypriion oxygeneios*). Both fishing methods were used from the same vessel. The current Fishery Operation Plans are outlined in COMM 12 – Prop 23.1 (for droplines) and COMM12 – Prop 16.1 (for traps).

The Cook Islands' programme has previously been audited by WCPFC. This was first undertaken in August 2011 and since then has undergone a second audit in August 2017 with the latest (third) audit being completed in July 2024. While the fisheries are different the principles will be the same across all programmes and their observers are trained to operate in all areas. This assessment is just for the SPRFMO Area and the materials are assessed on that basis.

A large number of materials were provided and while they were sorted into separate folders according to the 13 requirements some of them were not especially relevant to SPRFMO and have not been referenced for the purpose of this assessment. Twenty two documents were selected (Table 1). The focus in the initial documents provided were mainly on purse seine and longline tuna fisheries, dating back a number of years. The PIRFO training framework provided was more recent, dated from December 2023, and gives clear guidelines on the training and skills required to meet various PIRFO standards, including debriefer standards. It is however focussed on the WCPFC tuna observer programmes. An e-learning course was later provided and while it was provided to the Cook Islands by the New Zealand Ministry for Primary Industries, and focussed primarily on New Zealand fisheries, it was well laid out and covered all the requirements for Accreditation, including a section specific to SPRFMO. A notable exception however was that was no information on trap fishing and little information in sampling of the main species they target. These were however later provided. The e-learning course uses Fisheries New Zealand (FNZ) codes which differ from the FAO codes used by SPRFMO, although the forms observers use for their submissions do specify FAO 3-alpha codes so observers are presumably shown these as well.

**Based on the information provided we would recommend this Programme for accreditation.**

Below is a timeline of events for the evaluation.

Date	Actions
Annual Commission Meeting (21 <sup>st</sup> February 2025)	Members, CNCP or service provider (applicant) provides notification of intention to be assessed.
Following Annual Commission Meeting	Assessor (MRAG Ltd) contacts each applicant and agrees a timetable for the assessment process (Starting at time T) and shares assessment guidelines.
T + 0 days (Start of process at least 6 months before Commission meeting 6 <sup>th</sup> September 2025)	Assessment process to begin with applicant. Applicant provides all required documentation to assessor, in country visits or online meetings take place to discuss information provided by applicant.
T + 14 days	Assessor will liaise with applicants as appropriate (including, but not limited to, bilateral consultations) and may request additional documentation if substantive or essential information is missing
T + 28 days	Assessor receives additional documentation requested during assessment process and collates all materials
At least 120 days before Annual Commission Meeting (i.e. by 6 <sup>th</sup> November 2025)	Assessor provides Draft Preliminary Evaluation Report to applicant for comment Following this Applicants will be offered 30 days for Bilateral consultations to ensure that they have an opportunity to provide additional information and corrections relevant to their evaluation
At least 90 days before Annual Commission Meeting (i.e. by 6 <sup>th</sup> December 2025)	Assessor provides Preliminary Evaluation Report(s) to Applicant(s) and Secretariat
60 days before Annual Commission Meeting (i.e. by 1 <sup>st</sup> January 2026)	Assessor provides Final Evaluation Report(s) including recommended conditions and incorporating feedback received on the preliminary evaluation.
30 days before CTC meeting (i.e. 4 <sup>th</sup> February 2026).	Secretariat circulates the Final Evaluation Report(s) as an Annexes to the SPRFMO Observer Programme Implementation Report
Annual Commission Meeting (6 <sup>th</sup> March 2026)	The Commission evaluates all reports and recommendations and will decide whether to grant accreditation (including specified conditions).

## **Designated Contacts**

During the accreditation process, we would request that all official correspondence be addressed to, or at least copied to the following individuals:

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Mr John Pearce      [j.pearce@mrag.co.uk](mailto:j.pearce@mrag.co.uk)      Project Manager

## Summary of Evidence submitted

**Table 1 Summary of documents submitted**

#	Document Title	Please indicate which for which standards this document is used as evidence												
		1	2	3	4	5	6	7	8	9	10	11	12	13
1	SPRFMO Observer contract Template	✓									✓	✓	✓	
2	Observer Code of conduct	✓												
3	Minimum Standards for Observers	✓												
4	Certification	✓												
5	Conflict of Interest Declaration	✓												
6	Observer_qualification_record-crop	✓												
7	Observer recruitment criteria		✓					✓						
8	pirfo-training-framework-v4			✓	✓									
9	folder – Observer Training quide			✓		✓								
10	PIRFO Debriefe Policy II Final 2020				✓	✓								
11	MMR Data Management Standard Operating Procedure						✓							
12	Observer ID Template_v002								✓	✓				
13	SPRFMO_-Observer_placement[1]							✓	✓					
14	OK Board letter template									✓				
15	Access Agreement Template 2020 Observers									✓				
16	Observer_Safety_Equipment_Checklist										✓			
17	Emergency Action Plan FINAL												✓	
18	Cook Islands Ministry of Marine Resources_2025-2026													✓
19	E-learning_20251110							✓						
20	COMM 12 – Prop 16.1 Cook Islands Fisheries Operation Plan for an Exploratory Trap Fishery in the SPRFMO Area			✓			✓							
21	SPRFMO_LobsterTrapSampling			✓			✓							
22	Lobster genetic sampling manual			✓			✓							
23	COMM 12 – Prop 23.1 Fisheries Operation Plan for Exploratory Hapuka Fishery. Cook Islands.			✓			✓							

A summary of the evaluation is outlined in the table below with more detailed comments in the main assessment.

Requirement	Total requirements	Pass	Fail
1. Impartiality, independence and integrity	5	5	0
2. Observer qualifications	1	1	0
3. Observer training	2	2	0
4. Observer trainers	1	1	0
5. Briefing and debriefing	2	2	0
6. Data validation process	10	10	0
7. Observer identification cards	1	1	0
8. Coordinating observer placements and observer deployments	4	4	0
9. Observer safety equipment	1	1	0
10. Responding to allegation of observer misconduct	1	1	0
11. Dispute settlement	1	1	0
12. Observer safety	2	2	0
13. Insurance and liability	1	1	0

## 1 Impartiality, independence and integrity

#	Minimum Standard	Pass/Fail	Evidence Provided
1.1	National observer programmes and service providers shall only deploy independent and impartial observers. This means that neither the national observer programme or service provider, as the case requires, nor the individual observers, have a direct financial interest, ownership or business links with vessels, processors, agents and retailers involved in the catching, taking, harvesting, transporting, processing or selling of fish or fish products.	(P)	<p>Included in the <b>SPRFMO Observer Contract Template</b> Para 23 - Conflict of Interest declaration - stating 'The Observer Programme Provider confirms that they have no direct financial interest, ownership, or business affiliations with any fishing vessels, processors, agents, or retailers engaged in the catching, taking, harvesting, transporting, processing, or selling of fish or fish products. This declaration ensures the independence and impartiality of the Observer in the execution of their duties under this Agreement'</p> <p><b>Minimum Standards for Observers</b> also outline observer duties which include maintaining independence and impartiality while on duty.</p> <p><b>Conflict of Interest Declaration</b> provided, to be signed by the observer and reviewed and signed by programme manager.</p>
1.2a	<p>The national programme or service provider, and the individual observers:</p> <p>a) Shall not have a direct financial interest, other than the provision of observer services, in the fisheries under the purview of the Commission, including, but not limited to: i) any ownership, mortgage holder, or other secured interest in a vessel or processor involved in the catching, taking, harvesting or processing of fish; ii) any business selling supplies or services to any vessel or processor in the fishery; iii) any business purchasing raw or processed products from any vessel or processor in the fishery.</p>	(P)	<p>Outlined in the <b>SPRFMO Observer Contract Template</b> Para 22 - Conflict of Interest and Financial Disclosure - stating 'The Contractor shall not have a direct financial interest, other than the provision of observer services, in the fisheries under the purview of the Commission.'</p>

#	Minimum Standard	Pass/Fail	Evidence Provided
1.2b	Shall not solicit or accept, directly or indirectly, any gratuity, gift, favour, entertainment, inordinate accommodation, loan or anything of monetary value from anyone who either conducts activities that are regulated by a Member or CNCP connected with its services or the Commission, or has interests that may be substantially affected by the performance or non-performance of the observer's official duties;	(P)	<p><b>Observer Code of conduct</b> under - employment restrictions - para j) Observers shall not solicit or accept, directly or indirectly, any gratuity, gift, favour, entertainment, inordinate accommodation, loan or anything of monetary value from anyone who either conducts activities that are regulated by a Member or CNCP connected with its services or the Commission, or has interests that may be substantially affected by the performance or non-performance of the observer's official duties</p> <p><b>Conflict of Interest Declaration</b> provided, to be signed by the observer and reviewed and signed by programme manager.</p>
1.2c	Shall not serve as an observer on any vessel or at any processors owned or operated by a person who previously employed the observer in another capacity within the last three years (e.g., as a crew member)	(P)	<p>Outlined in the <b>SPRFMO Observer Contract Template</b> Para 23 – Conflict of Interest Declaration – stating that 'The Observer Programme Provider confirms that they have no direct financial interest, ownership, or business affiliations with any fishing vessels, processors, agents, or retailers engaged in the catching, taking, harvesting, transporting, processing, or selling of fish or fish products.'</p> <p>Samples of observers qualifications provided – <b>observer_qualification_record-crop</b></p>

#	Minimum Standard	Pass/Fail	Evidence Provided
1.2d	Shall not solicit or accept employment as a crew member or an employee of a vessel or processor while employed by a national observer programme or service provider.	(P)	<p><b>Observer Code of conduct</b> under employment restrictions para k) Observers shall not solicit or accept employment as a crew member or as an employee of a vessel or processor while employed by the Cook Islands national observer programme. This restriction ensures the independence, impartiality, and integrity of observers in carrying out their duties.</p> <p><b>Conflict of Interest Declaration</b> provided, to be signed by the observer and reviewed and signed by programme manager.</p>

## 2 Observer Qualifications

#	Minimum Standard	Pass/Fail	Evidence Provided
2.1	The national observer programmes or service providers shall demonstrate that observers that are recruited into their programme have relevant education or technical training and/or experience for the fleets concerned; ability to meet the observer duties described in this annex; no record of convictions calling into question the integrity of the observer or indicating a propensity towards violence; and the ability to obtain necessary documentation, including passports and visas	(P)	<p>Detailed in <b>Observer recruitment criteria</b>, as part of the observer recruitment process, Applicants must meet the following criteria and education background listed below:</p> <ul style="list-style-type: none"> <li>• Passed High School level Certificate or equivalent</li> <li>• Physically fit and healthy for active sea work</li> <li>• Clear police record check</li> <li>• Able to read and to write reports in understandable English</li> <li>• Be willing and able to spend periods of 15 to 30 days, or occasionally more, at sea.</li> <li>• Available to go out to sea at anytime, as required</li> <li>• Must pass FFA/SPC pre-selection test</li> </ul> <p>Observers are required to sit a pre-selection test and successful candidates are interviewed.</p> <p>Observers that are recruited into their programme must hold Certificate 3 in Observer Operations (PIRFO).</p>

### 3 Observer Training

#	Minimum Standard	Pass/Fail	Evidence Provided
3.1	National observer programmes or service providers shall demonstrate that observers are adequately trained before their deployment. Training shall include all the elements outlined in Annex 3 of CMM-16-2025, and that data are being collected in line with the requirements set out in CMM 02-2025	(P)	<p>The <a href="#">pirfo-training-framework-v4</a> is provided in English and maps comprehensively to the elements outlined in Annex 3 of CMM-16-2023 (Annex 1). Training runs over 5 weeks <b>Agenda (5 week course)</b> is included in the <b>Observer training guide folder</b>, which also includes examples from specific courses. Copies of exams are also provided, including <b>Species ID test No 3</b>, a test on charts, <b>2005 Final Test Chart</b>, and a general final test – <b>Final Test Master</b> that covers data collection, although this is more focussed on longliners and purse seiners.</p> <p>The <b>Lobster genetic sampling manual</b> and <b>SPRFMO_LobsterTrapSampling</b> provide more specific information on sampling and collecting data on the vessel and species that operate in the SPRFMO area. The <b>COMM 12 – Prop 16.1 Cook Islands Fisheries Operation Plan for an Exploratory Trap Fishery in the SPRFMO Area</b> outlines the sampling requirements of the Cook Island vessel operating in the exploratory bottom fishing fishery in SPRFMO. This includes the requirement for 200% observer coverage under MMR. Similarly, <b>COMM 12 – Prop 23.1 Fisheries Operation Plan for Exploratory Hapuka Fishery</b>. <b>Cook Islands</b> summarises the requirements for the more recent exploratory fishery for hapuka.</p> <p>A comprehensive e-learning course is provided (<a href="#">E-learning_20251110</a>) which covers a number of different 'Blocks' or modules looking at, among other things, international frameworks and obligations (including SPRFMO), vessel and fish ID and biological sampling. While not SPRFMO specific, it's focussed more on New Zealand fisheries it keeps track of where an observer is up to and contains tests along the way to reinforce the learning. It should be noted though that the three letter species codes used for Jack mackerel appear to be different to the FAO ASFIS codes used by SPRFMO.</p>
3.2	Refresher training should be ongoing dependent on the qualification requirements. Relevant updates to CMMs and observer requirements should be communicated to observers before each deployment as part of the briefing process, for example in an updated manual	(P)	<p>Refresher courses are conducted, either in person or via zoom, annually or when needed (<b>B. Ariihee pers. comm.</b>). The <a href="#">pirfo-training-framework-v4</a> undergoes regular revisions, with a clear modification history documenting what has changed in each version. For example, Version 4.0 (Dec 2023) was a major revision, introducing updated unit codes and increased units (from 3 to 8) in core qualifications like Certificate III in Observer Operations.</p>

## 4 Observer Trainers

#	Minimum Standard	Pass/Fail	Evidence Provided
4.1	National programmes or service providers shall demonstrate that observer trainers have the appropriate skills and have been authorised by that national programme or service provider to train observers	(P)	CKOB Do not have Observer Trainers as training is requested to and run by MPI (Ministry for Primary Industries), based in New Zealand. The requirements are set out in the document <a href="#">pirfo-training -framework-v4</a> , they must hold a Training & Assessment (T&A) qualification from an accredited training institute.

## 5 Briefing and Debriefing

#	Minimum Standard	Pass/Fail	Evidence Provided
5.1	National observer programmes or service providers shall demonstrate that there are systems for briefing and debriefing observers and communicating at any time with vessel captains.	(P)	<p>Observer debriefing procedures are outlined in <b>PIRFO Debriefer Policy II Final 2020</b> – The Cook observer Debriefer will debrief the observers, checking data once received. Debriefings may be done face to face or remotely, for example using Zoom.</p> <p>This policy was agreed upon at the Regional Fisheries Observer Coordinators' Workshop in 2006, officially called the 'Western and Central Pacific Island Observer Programmes Regional Observer Debriefing Policy.'</p> <p>Appendix 1 of the policy lays out the timeline and deadlines for the each stage of the debrief</p>
5.2	The briefing and debriefing process shall be conducted by properly trained personnel and shall ensure that observers and vessel captains clearly understand their respective roles and duties	(P)	<p>As described in <b>PIRFO Debriefer Policy II Final 2020</b>, page 8 , "the applicant must have completed the requirements of the qualification <i>PIROBS416 – Certificate 4 in Debriefer Operations (PIRFO)</i>." in order to perform a debriefing.</p> <p>Debriefers all certified through a workshop session and will have a period of mentoring to give them some practical experience prior to going alone. The process for this is highlighted in the <b>PIRFO Debriefer Policy II Final 2020</b>. The document goes on to state the minimum sea time an observer needs prior to applying for 'debriefer training', this varies according to the type of gear being monitored.</p>

## 6 Data Validation Process

#	Minimum Standard	Pass/Fail	Evidence Provided
6.1	National observer programmes or service providers shall demonstrate that they have an observer data validation process in place. The data validation process shall be conducted by properly trained personnel and shall ensure that data and information collected by an observer are checked for discrepancies or inaccuracies that are corrected before the information is entered into a database or used for analysis. This includes ensuring that the national observer programme or service provider has in place a mechanism to receive data, reports and any other relevant information from an observer in such a way that prevents interference in that data from other sources.	(P)	<p>Outlined in <b>MMR Data Management Standard Operating Procedure</b> section 9, detailing observer data verification checks, including both manual and automated checks.</p> <p>The programme is increasingly using Electronic Reporting (ER) in place of paper logbooks and forms. This allows for build in data checks and error trapping, although data collected this way are still checked during debrief. Data can be submitted either electronically or using paper forms.</p> <p>Debriefings are scored with the scores being entered into TUFMAN2.</p> <p>Observer data are checked against vessel data, both from their logbooks and the vessel's VMS data.</p> <p>Data storage and security is outlined in section 10 of the <b>MMR Data Management Standard Operating Procedure</b>.</p> <p>The <b>PIRFO Debriefer Policy II Final 2020</b> emphasises the importance of the debrief as part of the data quality assurance procedure.</p> <p>Corrections made to paper versions of the observers' data will be made in different colour pens to keep track of who is making the correction (blue for observer, green for the debriefer and red for the data entry personnel).</p>
6.2	The data validation process shall ensure that the data meet the standards laid out in Annex 3 of CMM-16-2025.	(P)	<p>The <b>MMR Data Management Standard Operating Procedure</b> lays out the standards and Table 3 of the document gives links to the relevant SPRFMO guidelines on data standards (CMM 02-2022). Although not specific to the SPRFMO observer programme training materials do include information on recording and reporting on the items in Annex 3 of CMM-16-2025. The observer sampling requirements for both gear types are summarised in the <b>Fisheries Operation Plans - COMM 12 – Prop 23.1 Fisheries Operation Plan for Exploratory Hapuka Fishery, Cook Islands</b> and the <b>COMM 12 – Prop 16.1 Cook Islands Fisheries Operation Plan for an Exploratory Trap Fishery in the SPRFMO Area</b>.</p>

#	Minimum Standard	Pass/Fail	Evidence Provided
	a) A mechanism that allows scientific data to be stored and transferred to the national observer programme (or service provider) in a secure and confidential manner.	(P)	Document <b>MMR Data Management Standard Operating Procedure</b> section 10 clearly outlines mechanisms for the secure and confidential storage and transfer of scientific data to the national observer programme or service provider.
	b) Vessel information uniquely identifies the actual vessel from which the fishing occurred.	(P)	Outlined in <b>MMR Data Management Standard Operating Procedure</b> section 6.1.1 and includes vessel name, IRCS, register number and licence number.
	c) Dates and times of fishing effort are included and internally consistent (for example an end time should be after a start time)	(P)	It is stated in <b>Folder – Observer training guide \ Fiji course March 2011</b> page 22 that observers must use the ship's time for all data recording and this must be in 24-hour format. Additionally, in the <b>E-learning_20251011 / FOS - Block 1 - 5</b> course, there are links to up-to-date SPRFMO observer data submission templates with associated explanatory notes for date and time format.
	d) Location of fishing is included and valid (for example, logical latitude/longitude combinations), internally consistent and entered in the correct units	(P)	Observer fishing locations are recorded in a specific format (decimal degrees) as indicated in the links to SPRFMO data submission templates found in <b>E-learning_20251011 / FOS - Block 1 – 5</b> ( <a href="https://www.sprfmo.int/fisheries/data-2/data-submission">https://www.sprfmo.int/fisheries/data-2/data-submission</a> )
	e) Effort data allows quantification of the amount of effort invested by the vessel, appropriate to the fishing method used, which is also identified.	(P)	Effort data are recorded as per SPRFMO data standards. Templates used can be accessed through the <b>E-learning_20251110</b> , although there is no form for traps, historically the main fishing method used by the Cook Islands in SPRFMO. No fishing operations have taken place in SPRFMO, therefore no data have been submitted to the Secretariat over the last two years.
	f) Catch information identifies the fishery resource (to the species level where possible) and the quantity of that species retained or discarded. If used, species codes are accurate	(P)	The training materials provided ( <b>E-learning_20251110</b> ) contains modules on 'Identifying Commercial Fishes' and 'Catch Assessment'. It appears to use different species codes to the FAO ASFIS ones used by SPRFMO.
	g) Where biological or length information is collected for a fish, it is directly linked to the effort in which it was caught – including date and time, location, and fishing method information, and	(P)	The training materials provided ( <b>E-learning_20251110</b> ) contain modules on 'Catch assessment' and 'Biological Sampling' which run through how to give independent estimates of catch weight and composition and how to collect biological samples from each catch. The module 'Our International Frameworks and Obligations' contains links to

#	Minimum Standard	Pass/Fail	Evidence Provided
	includes the methodology of data collection		forms for recording and submitting data for observers operating in the SPRFMO area for all the gear types. These record all the required biological data, linking it to the relevant fishing operation. It should be noted however that the course does not contain any information on pot / trap fishing, which is the technique used by the Cook Islands in SPFRMO.
	h) If the observer programme extends to transhipment and/or landings, then the amount and species of fishery resources transhipped/landed is quantified and recorded according to a standard methodology	(P)	The programme does not currently extend to transhipment, however data to be recorded during a transhipment are outlined in <b>MMR Data Management Standard Operating Procedure</b> and data catch log. Links also exist to the SPRFMO transhipment forms to be completed by observers.
	i) Interaction data involving marine mammals, seabirds, reptiles and/or other species of concern identifies the individual species (where possible), the number of animals, fate (retained or released/discard), life status if released (vigorous, alive, lethargic, dead), and the type of interaction (hook /line entanglement / warpstrike / net capture / other).	(P)	Some indication of recording of marine mammal interactions is presented in <b>Folder – Observer training guide \ Fiji course March 2011</b> page 9, although brief.  A link to the SPRFMO forms for reporting of non-target species interactions can be found in the <b>E-learning_20251011 / FOS - Block 1 - 5 SPRFMO</b> section.

## 7 Observer Identification Cards

#	Minimum Standard	Pass/Fail	Evidence Provided
7.1	National observer programmes or service providers shall provide observers with identification cards that include the full name of the observer, date of issue and expiration, the name of the national observer programme or service provider, a unique identifying number (if issued by the national observer programme or service provider) a passport style photo of the observer, an emergency phone number	(P)	The Document <a href="#">Observer ID Template_v002</a> contains the minimum requirements for observer ID cards, as required by SPRFMO.

## 8 Coordinating Observer Placements and Observer Deployments

#	Minimum Standard	Pass/Fail	Evidence Provided
8.1	National observer programmes or service providers shall demonstrate responsibility and capacity for the timely deployment of observers and will ensure that the selected observer receives all possible assistance during the entire length of their placements	(P)	<p><b>Access Agreement Template 2020</b> is an agreement between the Cook Islands Government and individual vessel companies with regards to the access rights of their vessels to the fishery. This includes the requirement to carry observers and the conditions under which they should be allowed to work. This is specific for the EEZ though rather than SPRMO waters.</p> <p>The <b>SPRFMO_-_Observer_placement[1]</b> also outlines the embarkation procedures including checklists for the safety gear, instructions to the vessel captain outlining the obligations of the observer and the obligations of the vessel in assisting the observer with their duties.</p> <p>An <b>embarkation letter</b> is provided which will inform SPRFMO about the observer deployment, giving name, dates and vessel details.</p>
8.2	National observer programmes or service providers shall have in place a protocol to replace an observer if the observer becomes unable to perform their duties.	(P)	<p>The <b>Observer Movement register</b> gives a record of observers who have been deployed and those who have come back and be available to be deployed or act as a replacement.</p> <p><b>Access agreement</b> Paragraph 9 states that the company will not be responsible for any injury resulting from a crew or company member, although this only applies to vessels licenced to fish in EEZ.</p>
8.3	National observer programmes or service providers shall also seek, to the extent possible, to avoid deploying a single observer on multiple consecutive trips on the same vessel	(P)	<p>While no specific policy appears to be in place, the <b>Observer Movement register</b> gives a record of observers who have been deployed including vessels that they have been deployed on. This should reduce the likelihood of them being deployed twice on the same vessel.</p>

#	Minimum Standard	Pass/Fail	Evidence Provided
8.4	<p>It is the responsibility of a national observer programme or service provider to administer observer placements, to maintain the independence and impartiality of observers as described in this measure and ensure that all placements are administratively finalised as soon as practicable after the observers return to port. The national observer programme or service provider is expected to communicate with the observer regarding upcoming deployments, coordinate observer travel, and provide the necessary supplies for observer duties.</p>	(P)	<p>The <b>Observer Movement register</b> keeps a track of all observer placements.</p> <p>The <b>Observer Code of Conduct</b> and <b>Observer Contract</b> state the requirement for independence and impartiality, with the Observer Programme Provider confirming that neither they nor the observer have any financial interest or other connections to the industry through a Conflict of Interest Declaration.</p>

## 9 Observer Safety Equipment

#	Minimum Standard	Pass/Fail	Evidence Provided
9.1	National observer programmes or service providers must demonstrate that observers are provided with appropriate equipment, including safety equipment, which is in good working order, routinely checked and renewed to carry out their duties on board a vessel. Essential equipment includes a lifejacket, independent two-way communication device capable of sending and receiving voice or text communications, personal locator beacons (PLBs), immersion suits, hard hat, proper deck working boots or shoes, gloves and protective glasses (including sunglasses)	(P)	<p><b>Observer_Safety_Equipment_Checklist</b> provides comprehensive evidence that observers are issued essential safety equipment such as lifejackets, PLBs, inReach 2-way communication device, hard hats, steel-toe boots, gloves and safety glasses.</p> <p>The <b>Cook Islands National Observer Emergency Action Plan FINAL</b> also mentions that communications can be undertaken using the inReach unit that is issued to the observer.</p> <p>The <b>PIRFO Debriefeर Policy II Final 2020</b> also states that observers should be issued with an independent two-way communication device and a Personal Locator Beacon (PLB).</p>

## 10 Responding to Allegations of Observer Misconduct

#	Minimum Standard	Pass/Fail	Evidence Provided
10.1	National observer programmes or service providers must establish procedures for preventing, investigating, and reporting on the misconduct of observers, in coordination with observers, vessel captains, and relevant Members and CNCPs	(P)	<p>Outlined in the <b>Observer Code of Conduct</b>, paragraphs ss) to xx), any observer breaching the Code of Conduct will be investigated.</p> <p>The mechanism for Dispute Resolution is also outlined in paragraph 24 of the <b>SPRFMO Observer contract Template</b>.</p> <p>The <b>PIRFO Debriefefer Policy II Final – 2020</b> outlines a review of the observer's performance as one of the objectives of the debrief, although SPRFMO is not specifically mentioned.</p>

## 11 Dispute Settlement

#	Minimum Standard	Pass/Fail	Evidence Provided
11.1	National observer programmes or service providers shall demonstrate the existence of a dispute resolution process fair to all parties that provides a process to resolve issues through appropriate means including facilitation and mediation	(P)	<p>Outlined in the <b>Observer Code of Conduct</b> that in the event of a reported breach of observer conduct, an investigation will take place.</p> <p>The mechanism for Dispute Resolution is also outlined in paragraph 24 of the <b>SPRFMO Observer contract Template</b>, which states that parties seeking resolution can do so under the Arbitration Act of 2014.</p> <p>The <b>PIRFO Debriefer Policy II Final – 2020</b> does allow debriefers to check and verify any data and identify any harassment issues that the observer may have had.</p>

## 12 Observer Safety

#	Minimum Standard	Pass/Fail	Evidence Provided
12.1	National programmes or service providers must demonstrate that procedures are in place to support observers in their ability to carry out their duties unimpeded and in a safe working environment, including an established Emergency Action Plan (EAP). The EAP must provide instructions on sending reports to the provider's designated 24-hour point(s) of contact to report unsafe conditions, including instances of harassment, intimidation or assault.	(P)	<p>The <b>Cook Islands National Observer Emergency Action Plan FINAL</b> outlines the Emergency Action Plan (EAP). It includes points of contact and flowcharts showing the procedures to follow in a number of different scenarios (e.g. injury, harassment, mental disorder). It follows guidelines on observer safety developed during the WCPFC 12.</p> <p>The <b>PIRFO Debriefer Policy II Final 2020</b> highlights the debriefing process, this includes a Pre-debriefing process which allows the debriefer to check on issues of observer welfare, safety and any incidents that could require immediate attention from the Authority. These are outlined in the GEN-3 form which all observers complete at the end of their trip.</p>
12.2	National observer programmes or service providers must also provide a permanent delegate or supervisor on land to communicate with the observer at any time while at sea	(P)	<p>The <b>Cook Islands National Observer Emergency Action Plan FINAL</b> defines the role of a Command Centre Coordinator , who will either be the Observer Coordinator or the Duty Officer through the Ministry of Marine Resources (MMR). It outlines the reporting pathways through a series of flow charts for different scenarios.</p> <p>The <b>SPRFMO Observer contract</b> also provides the contact details for the Observer Coordinator and an Alternate.</p>

## 13 Insurance and Liability

#	Minimum Standard	Pass/Fail	Evidence Provided
13.1	National observer programmes or service providers must demonstrate that observers have health, safety and liability insurance commensurate with the national standards of the observer programme or service provider for such insurance for the duration of any deployment before placing the observer on a vessel.	(P)	<p>Insurance and Liability requirements are mentioned in the <b>SPRFMO Observer contract</b>, it is the responsibility of the Employee to take out insurance for the observer for the duration of the contract.</p> <p>More detail on Observer Insurance 2025-2026 is given in the document <b>Cook Islands Ministry of Marine Resources_2025-2026</b>, covering 15 observers for the organisation up to 9<sup>th</sup> February 2026.</p>



# SPRFMO Observer Programme Accreditation Assessment



## Ecuador Final Evaluation Report 31<sup>st</sup> December 2025



**MRAG**

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MRAG Ltd is an independent fisheries and aquatic resource consulting firm dedicated to the sustainable use of natural resources through sound, integrated management practices and policies.

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## Introduction

Ecuador's assessment was submitted by TUNACONS (Tuna Conservation Group), a group of vessel owning companies that currently operate a fleet purse seine vessels operating in the east Pacific, both within EEZs and in international waters under the IATTC (Inter American Tropical Tuna Commission). They have been operational since 2016, started their observer programme in 2018 and since 2022 have achieved MSC status. The selection, recruitment, training and general administration of the observers is undertaken the Escuela de Pesca del Pacifico Oriental (ESESPO), they also deal with the contractual matters including payments. In 2023 they had a team of 23 observers covering 17 vessels.

Thirty one documents were reviewed for this assessment, including the MSC Year 3 surveillance report. The report reviewed the observers' data collection, particularly in relation to ETP (Endangered, Threatened and Protected) species and noted the improvement since the initial certification. The documents provided demonstrated a comprehensive programme that met the requirements of IATTC (and the MSC), however it was lacking in some key information specific to the SPRFMO requirements. Through direct communication with TUNACONS they stated that they did not have any current operational experience within SPRFMO, applying its CMMs, specific data requirements and identification of target or non-target species. Through submitting their materials they were demonstrating that that they would have the technical and operational capacity should they choose to expand their operations into other RFMOs, such as SPRFMO. We believe they have demonstrated that, but as it stands we do not believe their programme meets the particular requirements for accreditation under 16-2025. We hope that Ecuador will continue to work on developing the programme, based on this assessment and through working with the Secretariat, to make it more specific to the obligations of SPRFMO.

**Based on the information provided we would not recommend this Programme for accreditation under SPRFMO Observer Scheme. We would recommend they continue to develop it to bring it into line with the requirements of SPRFMO.**

Date	Actions
Annual Commission Meeting (21 <sup>st</sup> February 2025)	Members, CNCP or service provider (applicant) provides notification of intention to be assessed.
Following Annual Commission Meeting	Assessor (MRAG Ltd) contacts each applicant and agrees a timetable for the assessment process (Starting at time T) and shares assessment guidelines.
T + 0 days (Start of process at least 6 months before Commission meeting 6 <sup>th</sup> September 2025)	Assessment process to begin with applicant. Applicant provides all required documentation to assessor, in country visits or online meetings take place to discuss information provided by applicant.
T + 14 days	Assessor will liaise with applicants as appropriate (including, but not limited to, bilateral consultations) and may request additional documentation if substantive or essential information is missing
T + 28 days	Assessor receives additional documentation requested during assessment process and collates all materials
At least 120 days before Annual Commission Meeting (i.e by 6 <sup>th</sup> November 2025)	Assessor provides Draft Preliminary Evaluation Report to applicant for comment. Following this Applicants will be offered 30 days for Bilateral consultations to ensure that they have an opportunity to provide additional information and corrections

<b>Date</b>	<b>Actions</b>
	relevant to their evaluation
At least 90 days before Annual Commission Meeting (i.e. by 6 <sup>th</sup> December 2025)	Assessor provides Preliminary Evaluation Report to Applicant and Secretariat
60 days before Annual Commission Meeting (i.e. by 1 <sup>st</sup> January 2026)	Assessor provides Final Evaluation Report(s) including recommended conditions and incorporating feedback received on the preliminary evaluation.
30 days before CTC meeting (i.e. 4 <sup>th</sup> February 2026).	Secretariat circulates the Final Evaluation Report(s) as an Annexes to the SPRFMO Observer Programme Implementation Report
Annual Commission Meeting (6 <sup>th</sup> March 2026)	The Commission evaluates all reports and recommendations and will decide whether to grant accreditation (including specified conditions).

## **Designated Contacts**

During the accreditation process, we would request that all official correspondence be addressed to, or at least copied to the following individuals:

Mr James Moir-Clark      [j.clark@mrag.co.uk](mailto:j.clark@mrag.co.uk)      Project Director

Mr John Pearce      [j.pearce@mrag.co.uk](mailto:j.pearce@mrag.co.uk)      Project Manager

## Summary of Evidence submitted

Table 1 Summary of documents submitted

#	Document Title	Please indicate which for which standards this document is used as evidence												
		1	2	3	4	5	6	7	8	9	10	11	12	13
1	1.1.1-Declaratoria EPESPO sin intereses financieros	✓												
2	1.1.2-Declaración de Independencia y Ausencia de Conflictos de Interés	✓												
3	1.1.3-Contrato de Prestación de Servicios de Observador	✓												
4	1.2.1-CV OBSERVADOR	✓												
5	1.2.2-CONTRATO	✓												
6	1.2.3-Código de Conducta para Observadores en la Pesquería de	✓											✓	
7	2.1.1-Lista de Observadores con código y documentos fecha.		✓											
8	2.1.2-Documentación de Navegación. Blgo. Carlos Giovanny Echever Plúa. TUNACONS	✓												
9	2.1.3 CERTIFICATO SENESCYT	✓												
10	3.1.1-Manual CIAT explicación de Formularios			✓										
11	3.1.2-Actas Individuales		✓											
12	3.1.3-Longline program forms, manual, and codes			✓										
13	4.1.1-Curriculum Vitae of Erick Largacha (CIAT instructor)				✓	✓								
14	4.1.2-Curriculum Vitae of Dr. Melanie Hutchinson(Instructor for the observer tagging project)				✓	✓								
15	4.1.3-Curriculum Vitae of Ac. Pedro Santistevan (Program coordinator)				✓	✓								
16	4.1.4-Curriculum Vitae of Blgo. Leonardo Caicedo (data entry clerk and program editor for observers)				✓	✓								
17	5.1.1-Declaración de Obligación de Comunicación con Observadores a Bordo					✓								
18	6.1.1-C1 0532 Mantuano Quijije, Erwin Gabrie						✓							
19	6.1.2-Acta de cadena de custodia							✓						
20	7.1.1-Identificación Observadores Tunacons								✓					
21	9.1.1-Life jacket record – replacement of the same.									✓				
22	9.1.2-Procedure for providing and reviewing the observer's personal equipment.									✓				
23	10.1.1-PROCESS MANUAL – MISCONDUCT BY OBSERVERS										✓			
24	11.1.1-Procedure for Resolving Disputes between Observers and Onboard Personnel											✓		
25	11.1.2-Guide to dispute resolution procedures											✓		
26	11.1.3-Dispute report 1											✓		
27	11.1.4-Dispute report 2												✓	
28	12.2.1-Summary of security application by Observers.												✓	
29	13.1.1-CONTRATO CON SEGURO													✓
30	13.1.2-SOLICITUD DE SEGURO Y TODA INFO													✓
31	Eastern Pacific Ocean tropical tuna – purse seine (TUNACONS) fishery. Year 3 Surveillance Report.					✓								

A summary of the evaluation is outlined in the table below with more detailed comments in the main assessment.

Requirement	Total requirements	Pass	Fail
1. Impartiality, independence and integrity	5	3	2
2. Observer qualifications	1	1	0
3. Observer training	2	0	2
4. Observer trainers	1	1	0
5. Briefing and debriefing	2	2	0
6. Data validation process	10	4	6
7. Observer identification cards	1	0	1
8. Coordinating observer placements and observer deployments	4	0	4
9. Observer safety equipment	1	0	1
10. Responding to allegation of observer misconduct	1	1	0
11. Dispute settlement	1	1	0
12. Observer safety	2	1	1
13. Insurance and liability	1	1	0

## 1 Impartiality, independence and integrity

#	Minimum Standard	Pass / Fail	Evidence Provided
1.1	National observer programmes and service providers shall only deploy independent and impartial observers. This means that neither the national observer programme or service provider, as the case requires, nor the individual observers, have a direct financial interest, ownership or business links with vessels, processors, agents and retailers involved in the catching, taking, harvesting, transporting, processing or selling of fish or fish products.	(P)	<p>A declaration of financial and commercial independence signed by the observer training provider EPESPO (<a href="#">Doc 1.1.1</a>), as well as an observer signed copy (<a href="#">Doc 1.1.2</a>).</p> <p>A signed copy of an observer service contract (<a href="#">Doc 1.1.3</a>) has also been provided and reiterates the financial and commercial independence.</p>
1.2a	<p>The national programme or service provider, and the individual observers:</p> <p>a) Shall not have a direct financial interest, other than the provision of observer services, in the fisheries under the purview of the Commission, including, but not limited to: i) any ownership, mortgage holder, or other secured interest in a vessel or processor involved in the catching, taking, harvesting or processing of fish; ii) any business selling supplies or services to any vessel or processor in the fishery; iii) any business purchasing raw or processed products from any vessel or processor in the fishery.</p>	(F)	<p>An observer resume is provided (<a href="#">Doc 1.2.1</a>) detailing previous employment of observer to indicate interests prior to engagement.</p> <p>Signed observer contract (<a href="#">Doc 1.2.2</a>) does not include specific language that addresses restrictions on the financial interests of observers.</p> <p>A signed observer service contract (<a href="#">Doc 1.1.3</a>) barring direct employment or contract arrangements with entities in the fishery. However, it does not cover restrictions on financial interests that go beyond employment.</p> <p>TUNACONS stated that:</p> <p><i>‘...their contracts and documentation are designed strictly for the IATTC observer programme, which is the only fishery in which they currently operate. Their observers may have multiple professional activities, including working on steel-hulled longline vessels and as such they could adapt to SPRFMO standards if required.</i></p> <p><i>The contracts they use comply with the independence requirements established by IATTC but not the language required by SPRFMO as they have not, to date, operated in any SPRFMO fishery. Given their experience and actual operations have been developed exclusively within the ICCAT framework, they feel it would not be appropriate to incorporate or declare SPRFMO specific clauses without any active operation under that regime. However, should they move into the fishery, they would be keen to discuss the necessary requirements to achieve certification’ (P. Santistevan, pers. comm.)</i></p>

#	Minimum Standard	Pass / Fail	Evidence Provided
1.2b	Shall not solicit or accept, directly or indirectly, any gratuity, gift, favour, entertainment, inordinate accommodation, loan or anything of monetary value from anyone who either conducts activities that are regulated by a Member or CNCP connected with its services or the Commission, or has interests that may be substantially affected by the performance or non-performance of the observer's official duties;	(P)	Code of conduct for observers (Doc 1.2.3) explicitly stating that they must not accept any bribes or gifts. This is further validated in a signed copy of the observer service contract (Doc 1.1.3)
.1.2c	Shall not serve as an observer on any vessel or at any processors owned or operated by a person who previously employed the observer in another capacity within the last three years (e.g., as a crew member)	(P)	Record of previous employment can be found in the observer CVs, an example seen in Doc 1.2.1.
1.2d	Shall not solicit or accept employment as a crew member or an employee of a vessel or processor while employed by a national observer programme or service provider.	(C)	See Section 1.2a for TUNACONS statement.

## 2 Observer Qualifications

#	Minimum Standard	Pass / Fail	Evidence Provided
2.1	The national observer programmes or service providers shall demonstrate that observers that are recruited into their programme have relevant education or technical training and/or experience for the fleets concerned; ability to meet the observer duties described in this annex; no record of convictions calling into question the integrity of the observer or indicating a propensity towards violence; and the ability to obtain necessary documentation, including passports and visas	(P)	<p>Doc 2.1.1 contains a list of observers and their respective certification/document expiry dates.</p> <p>Documents pertaining to qualifications of individual observers have been provided as follows:</p> <p><b>Doc 2.1.2</b> – Certifications and documents for a single observer including Seaman's book, Passport, Vaccinations, IATTC observer certificate and medical certificate.</p> <p><b>Doc 2.1.3</b> – proof of observer's fisheries biology degree issued by the Secretariat of Higher Education, Science, Technology and Innovation (SENESCYT).</p>

### 3 Observer Training

#	Minimum Standard	Pass / Fail	Evidence Provided
3.1	National observer programmes or service providers shall demonstrate that observers are adequately trained before their deployment. Training shall include all the elements outlined in Annex 3 of CMM-16-2025 and ensure that data are being collected in line with the requirements set out in CMM 02-2025	(F)	<p>Doc 3.1.1 provided is the observer training manual, and while this is very thorough, it is specific to CIAT/IATTC. However there are no training materials specific to operations within SPRFMO waters, especially in reference to Annex 3 of CMM-16-2025 or the data requirements set out in CMM 02-2025.</p> <p>Training records for the identification of bycatch species are found in <b>Doc 3.1.2</b>.</p> <p><b>Doc 3.1.3</b> is the field manual with various longliner reporting forms attached.</p> <p>TUNACONS have stated that all their training materials are based around the IATTC programme as they do not currently have any operations in the SPRFMO Area.</p>
3.2	Refresher training should be ongoing dependent on the qualification requirements. Relevant updates to CMMs and observer requirements should be communicated to observers before each deployment as part of the briefing process, for example in an updated manual	(F)	<p>TUNACONS stated that: <i>'Prior to departure, observers attend a meeting at the office where the trip is prepared. This is carried out directly with the program coordinator before embarkation. They then proceed to the office, where they receive instructions, updated manuals (or formal notices, where applicable), and all the necessary equipment for the trip, including replacements or any outstanding items.'</i> (P. Santistevan, pers. comm.)</p> <p>Although not provided, the <b>Eastern Pacific Ocean tropical tuna – purse seine (TUNACONS) fishery</b>. <b>Year 3 Surveillance Report</b> states that <i>'...observer and crew training is provided annually, where feedback on the results of the data collection program is provided.'</i></p> <p>However, in both cases, these are based around IATTC requirements rather than SPRFMO.</p>

## 4 Observer Trainers

#	Minimum Standard	Pass / Fail	Evidence Provided
4.1	National programmes or service providers shall demonstrate that observer trainers have the appropriate skills and have been authorised by that national programme or service provider to train observers	(P)	CVs of all staff involved in the observer programme have been provided in <b>Docs 4.1.1-4.1.4</b> , demonstrating a high degree of relevant experience in observer programmes and management.

## 5 Briefing and Debriefing

#	Minimum Standard	Pass / Fail	Evidence Provided
5.1	National observer programmes or service providers shall demonstrate that there are systems for briefing and debriefing observers and communicating at any time with vessel captains.	(P)	Doc 5.1.1 is a contract template between TUNACONS and the fishing company to ensure that communication between the observer and TUNACONS is not obstructed during their deployment.
5.2	The briefing and debriefing process shall be conducted by properly trained personnel and shall ensure that observers and vessel captains clearly understand their respective roles and duties	(P)	CVs of all staff involved in the observer programme have been provided in <b>Docs 4.1.1-4.1.4</b> , demonstrating a high degree of relevant experience in observer programmes and management.

## 6 Data Validation Process

#	Minimum Standard	Pass / Fail	Evidence Provided
6.1	National observer programmes or service providers shall demonstrate that they have an observer data validation process in place. The data validation process shall be conducted by properly trained personnel and shall ensure that data and information collected by an observer are checked for discrepancies or inaccuracies that are corrected before the information is entered into a database or used for analysis. This includes ensuring that the national observer programme or service provider has in place a mechanism to receive data, reports and any other relevant information from an observer in such a way that prevents interference in that data from other sources.	(P)	<p>Evidence that observer data is checked for discrepancies is shown in <b>Doc 6.1.1</b>, an evaluation of trip data by TUNACONS staff, which demonstrates a thorough review of the observers data, making sure everything has been recorded correctly.</p> <p>Security and confidentiality of data is confirmed in <b>Doc 6.1.2</b>, where the observer has signed that data has not been manipulated.</p> <p>The <b>Year 3 Surveillance Report</b> states that:</p> <p><i>'A data review and validation system has been implemented, for which the client provides various supporting documents (evaluation reports, observer satisfaction surveys, etc.)'</i></p> <p>In addition, TUNACONS state that:</p> <p><i>'Upon disembarkation, observers attend a meeting with the coordinator and are required to submit a trip report, including any observations or incidents. A face-to-face review is conducted with the data editor for an initial assessment.</i></p> <p><i>During data entry, an additional review is performed, and the data system includes parameters designed to prevent data-entry errors. Upon completion, a list of warnings and errors is generated for a third review, accompanied by an evaluation carried out by the coordinator and the technical team.'</i> (P. Santistevan, pers. comm.)</p>
6.2	The data validation process shall ensure that the data meet the standards laid out in Annex 7 and Annex 8 of CMM-02-2025	(F)	The data validation process is based around IATTC requirements and does not meet the requirements as laid out in the Annexes of CMM-02-2025.
6.2a	a) A mechanism that allows scientific data to be stored and transferred to the national observer programme (or service provider) in a secure and confidential manner.	(F)	The TUNACONS statement, under Section 6.1 demonstrates that observers are met off the vessel by the observer coordinator where both data and reports are handed over and checked. However there is no information on how data and reports are stored.

#	Minimum Standard	Pass / Fail	Evidence Provided
	b) Vessel information uniquely identifies the actual vessel from which the fishing occurred	(P)	<b>Doc 3.1.3</b> requires the observer to record the vessel name and registration. Although this is an example of a form for tuna longliners operating in the IATTC Area.
	c) Dates and times of fishing effort are included and internally consistent (for example an end time should be after a start time)	(P)	Standard date and time format expressed in <b>Doc 3.1.1</b> , using 24-hour clock (hh:mm) and YYMMDD format, although this is with reference to IATTC protocols.
	d) Location of fishing is included and valid (for example, logical latitude/longitude combinations), internally consistent and entered in the correct units	(F)	<b>Doc 3.1.1</b> references recording of latitude and longitude using degrees and minutes only. However Annex 7 of CMM-02-25 specifies decimal degree format for position data.
	e) Effort data allows quantification of the amount of effort invested by the vessel, appropriate to the fishing method used, which is also identified	(P)	<b>Doc 3.1.3</b> requires the observer to record the fishing effort in terms of number of hooks, length of line, set time etc. Although this is an example of a form for tuna longliners operating in the IATTC Area.  <b>Doc 3.1.1</b> also outlines the requirements for recording effort for longlines but includes purse seiners as well.
	f) Catch information identifies the fishery resource (to the species level where possible) and the quantity of that species retained or discarded. If used, species codes are accurate	(F)	Bycatch species (sharks, rays and turtles) ID guide provided in <b>Doc 6.2.1</b> including ASFIS codes, however no ID guide provided for target species.  <b>Doc 3.1.3</b> requires observers to record the species caught and the ultimate fate of that species. However this is an example of a form for tuna longliners operating in the IATTC Area.  No ID guides provided for target species caught in the SPRFMO Area.
	g) Where biological or length information is collected for a fish, it is directly linked to the effort in which it was caught – including date and time, location, and fishing method information, and includes the methodology of data collection	(F)	<b>Doc 3.1.3</b> links biological data collected to a longline section and gives some indication of the length measurements to be taken for different species. However this is an example of a form for tuna longliners operating in the IATTC Area and there is nothing SPRFMO specific.

#	Minimum Standard	Pass / Fail	Evidence Provided
	h) If the observer programme extends to transhipment and/or landings, then the amount and species of fishery resources transhipped/landed is quantified and recorded according to a standard methodology	N / A	No transhipments are undertaken.
	i) Interaction data involving marine mammals, seabirds, reptiles and/or other species of concern identifies the individual species (where possible), the number of animals, fate (retained or released/discard), life status if released (vigorous, alive, lethargic, dead), and the type of interaction (hook /line entanglement / warpstrike / net capture / other).	(F)	<p>Bycatch species ID guide provided in <b>Doc 6.2.1</b>, covering sharks, rays and turtles. No seabird species ID guide provided.</p> <p><b>Doc 3.1.3</b> requires observers to record interactions with marine mammals, birds, turtles etc. including the fate of the animal. However this is for longline vessels operating in IATTC and codes used are not consistent with SPRFMO requirements.</p> <p>Sampling methodology not clearly outlined in any of the documents.</p>

## 7 Observer Identification Cards

#	Minimum Standard	Pass / Fail	Evidence Provided
7.1	National observer programmes or service providers shall provide observers with identification cards that include the full name of the observer, date of issue and expiration, the name of the national observer programme or service provider, a unique identifying number (if issued by the national observer programme or service provider) a passport style photo of the observer, an emergency phone number	(F)	<p>Doc 7.1.1 is an example observer ID card, containing the full name of the observer, the name of the observer programme/service provider, a unique ID number, a passport style photo and a contactable email address. It does not, however, contain either an issue date or an expiry date, nor is there any sign of an emergency means of contact.</p> <p>TUNACONS stated that:</p> <p><i>'The identification card is primarily intended for port access. On board, observers are fully identified by the captain, navigator and fleet manager, who in turn coordinate with the Ecuadorian Navy when requesting sailing clearance.</i></p> <p><i>Emergency contact is established through the programme office and the coordinator. Vessel operators maintain direct contact details for emergencies, as vessels remain at sea for extended periods and owners have direct communication with their vessels. In the event of an emergency, they know whom to notify immediately. Observers are fully aware of these procedures and know that the programme's contact line operates 24 hours a day.'</i> (P. Santistevan, pers. comm.)</p> <p>While their cards are suitable for operators working with IATTC waters they do not unfortunately meet the requirements for the assessment.</p>

## 8 Coordinating Observer Placements and Observer Deployments

#	Minimum Standard	Pass / Fail	Evidence Provided
8.1	National observer programmes or service providers shall demonstrate responsibility and capacity for the timely deployment of observers and will ensure that the selected observer receives all possible assistance during the entire length of their placements	(F)	<p>TUNCONS commented on this section:</p> <p><i>'The identification cards provided are those previously submitted; however, observers are also properly identified through their personal identification documents. In addition, they hold valid fisheries observer licenses, which they carry at all times for full identification, sailing clearance and professional activity. Observers are registered in the Ecuadorian Navy database.'</i> (P. Santistevan, pers. comm.)</p> <p>However, no evidence was provided to meet the requirements under this section.</p>
8.2	National observer programmes or service providers shall have in place a protocol to replace an observer if the observer becomes unable to perform their duties.	(F)	No MoU or other document provided that demonstrates a protocol in place to replace an observer.
8.3	National observer programmes or service providers shall also seek, to the extent possible, to avoid deploying a single observer on multiple consecutive trips on the same vessel	(F)	No record of observers and their respective deployment vessel provided to show that multiple consecutive trips on the same vessel do not occur.

#	Minimum Standard	Pass / Fail	Evidence Provided
8.4	It is the responsibility of a national observer programme or service provider to administer observer placements, to maintain the independence and impartiality of observers as described in this measure and ensure that all placements are administratively finalised as soon as practicable after the observers return to port. The national observer programme or service provider is expected to communicate with the observer regarding upcoming deployments, coordinate observer travel, and provide the necessary supplies for observer duties.	(F)	No evidence of this process provided.

## 9 Observer Safety Equipment

#	Minimum Standard	Pass / Fail	Evidence Provided
9.1	National observer programmes or service providers must demonstrate that observers are provided with appropriate equipment, including safety equipment, which is in good working order, routinely checked and renewed to carry out their duties on board a vessel. Essential equipment includes a lifejacket, independent two-way communication device capable of sending and receiving voice or text communications, personal locator beacons (PLBs), immersion suits, hard hat, proper deck working boots or shoes, gloves and protective glasses (including sunglasses)	(F)	<p>Returned equipment lists verified by staff in <b>Doc 9.1.1</b>, includes some essential equipment such as gloves, lifejacket, safety boots and hardhat, however missing are an independent 2-way communications device, PLB and immersion suit.</p> <p>TUNACONS stated:</p> <p><i>'The vessels are already equipped with communication systems, and in most cases with satellite internet systems. If an observer has any concern or query, they request to contact the office and this is done immediately.</i></p> <p><i>Additionally, observers are required to send a coded email every Monday morning, through which they can report any anomaly or indicate that they wish to be contacted, if necessary.'</i> (P. Santistevan, pers. comm.).</p> <p>However, this does not meet the requirement laid out for this accreditation.</p> <p>Evidence of an observer wearing the provided safety equipment can be seen in <b>Doc 9.1.2</b>, where there is a photo (Imag.1) of the observer onboard the vessel.</p>

## 10 Responding to Allegations of Observer Misconduct

#	Minimum Standard	Pass / Fail	Evidence Provided
10.1	National observer programmes or service providers must establish procedures for preventing, investigating, and reporting on the misconduct of observers, in coordination with observers, vessel captains, and relevant Members and CNCPs	(P)	<p>Clear misconduct procedures are outlined in Doc 10.1.1, covering processes such as receipt of a misconduct report, preliminary investigation, evaluation/resolution and finally follow-up and closure.</p> <p>The consequences of misconduct are conveyed to observers through the code of conduct Doc 1.2.3 paragraph 4. They are also reminded to remain professional and avoid conflict in paragraph 2.5 of the same document.</p>

## 11 Dispute Settlement

#	Minimum Standard	Pass / Fail	Evidence Provided
11.1	National observer programmes or service providers shall demonstrate the existence of a dispute resolution process fair to all parties that provides a process to resolve issues through appropriate means including facilitation and mediation	(P)	<p>Dispute resolution procedures are outlined in Doc 11.1.1, aimed to establish a transparent, fair and documented mechanism for disputes that arise between observers and crew members/captains during deployments. The formal procedure is covered in paragraph 4, including initial notification, registration and preliminary analysis, review and mediation, and closure and corrective measures. These procedures are reiterated in the conflict resolution procedures guide (Doc 11.1.2).</p> <p>2 observer dispute reports have been submitted (Docs 11.1.3 and 11.1.4), containing testimonies of onboard disputes experienced by the observers. However, the resolution and follow-up by TUNACONS of such disputes has not been submitted, although there was reference to a Closure report in Doc 11.1.2.</p>

## 12 Observer Safety

#	Minimum Standard	Pass / Fail	Evidence Provided
12.1	National programmes or service providers must demonstrate that procedures are in place to support observers in their ability to carry out their duties unimpeded and in a safe working environment, including an established Emergency Action Plan (EAP). The EAP must provide instructions on sending reports to the provider's designated 24-hour point(s) of contact to report unsafe conditions, including instances of harassment, intimidation or assault.	(F)	No Emergency Action Plan was provided.
12.2	National observer programmes or service providers must also provide a permanent delegate or supervisor on land to communicate with the observer at any time while at sea	(P)	A dedicated land-based 24/7 contact is outlined in paragraph 4 of Doc 12.2.1, containing phone number and email.

## 13 Insurance and Liability

#	Minimum Standard	Pass / Fail	Evidence Provided
13.1	National observer programmes or service providers must demonstrate that observers have health, safety and liability insurance commensurate with the national standards of the observer programme or service provider for such insurance for the duration of any deployment before placing the observer on a vessel.	(P)	<p>Doc 13.1.1 is a signed health, safety and liability insurance contract for a single observer.</p> <p>They have also provided proof of health, safety and liability insurance for all other observers on their plan (Doc 13.1.2)</p>



# SPRFMO Observer Programme Accreditation Assessment



**Panama**  
Final Evaluation Report  
31<sup>st</sup> December 2025



**MRAG**





**MRAG Ltd** is an independent fisheries and aquatic resource consulting firm dedicated to the sustainable use of natural resources through sound, integrated management practices and policies.

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## Introduction

The Republic of Panama submitted a total of 33 documents to be reviewed by the assessment team. Panama does not currently operate fishing vessels targeting SPRFMO-regulated species within the Convention Area; however, Panamanian-flagged vessels have been involved in transhipment operations, with the primary species being Jumbo Flying Squid (*Dosidicus gigas*). Domestically, Panama has recently strengthened its regulatory framework, for example, by adopting Resolution No. 078 (7 October 2024) “By which the Observer Programmes on Board of Fishing Vessels, flying the Panamanian flag, are regulated” and administrative communications (e.g., ARAP Official Communication of 14 October 2024) that make mandatory the presence of observers on transhipment vessels from January 2025. Although the fisheries context and gears under SPRFMO differ from Panama’s current national portfolio, the principles underlying observer coverage, training, data collection, gear-specific protocols, debriefing and reporting apply. Panama’s current status therefore presents both a baseline regulatory foundation and a gap in operational deployment experience in the SPRFMO Area, which has been addressed as part of the accreditation review.

**Based on the information provided we would recommend this Programme for accreditation.**

Date	Actions
Annual Commission Meeting (21 <sup>st</sup> February 2025)	Members, CNCP or service provider (applicant) provides notification of intention to be assessed.
Following Annual Commission Meeting	Assessor (MRAG Ltd) contacts each applicant and agrees a timetable for the assessment process (Starting at time T) and shares assessment guidelines.
T + 0 days (Start of process at least 6 months before Commission meeting 6 <sup>th</sup> September 2025)	Assessment process to begin with applicant. Applicant provides all required documentation to assessor, in country visits or online meetings take place to discuss information provided by applicant.
T + 14 days	Assessor will liaise with applicants as appropriate (including, but not limited to, bilateral consultations) and may request additional documentation if substantive or essential information is missing
T + 28 days	Assessor receives additional documentation requested during assessment process and collates all materials
At least 120 days before Annual Commission Meeting (i.e. by 6 <sup>th</sup> November 2025)	Assessor provides Draft Preliminary Evaluation Report to applicant for comment Following this Applicants will be offered 30 days for Bilateral consultations to ensure that they have an opportunity to provide additional information and corrections relevant to their evaluation
At least 90 days before Annual Commission Meeting (i.e. by 6 <sup>th</sup> December 2025)	Assessor provides Preliminary Evaluation Report to Applicant and Secretariat
60 days before Annual Commission Meeting (i.e. by 1 <sup>st</sup> January 2026)	Assessor provides Final Evaluation Report(s) including recommended conditions and incorporating feedback received on the preliminary evaluation.

<b>Date</b>	<b>Actions</b>
30 days before CTC meeting (i.e. 4 <sup>th</sup> February 2026).	Secretariat circulates the Final Evaluation Report(s) as an Annexes to the SPRFMO Observer Programme Implementation Report
Annual Commission Meeting (6 <sup>th</sup> March 2026)	The Commission evaluates all reports and recommendations and will decide whether to grant accreditation (including specified conditions).

## **Designated Contacts**

During the accreditation process, we would request that all official correspondence be addressed to, or at least copied to the following individuals:

Mr James Moir-Clark      [j.clark@mrag.co.uk](mailto:j.clark@mrag.co.uk)      Project Director

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## Summary of Evidence submitted

**Table 1 Summary of documents submitted**

#	Document Title	Please indicate which for which standards this document is used as evidence												
		1	2	3	4	5	6	7	8	9	10	11	12	13
1	1.1 Declaration Independence Impartiality POPSA ENG-SPA	✓												
2	1.2 SWORN DECLARATION	✓												
3	1.3 Registro Publico - POPSA	✓												
4	1.4 Combined signed sworn declarations of 10 observers	✓							✓					
5	1.5 Aviso de Operacion - POPSA	✓												
6	1.6 Contrato por Tiempo Definido del Observador	✓												
7	1.7 Combined signed contracts of 10 observers	✓												
8	1.8 OBSERVER CODE OF CONDUCT Eng-Spa	✓												
9	1.9 Combined signed observer code of conduct of 10 observers	✓												
10	1.10 Combined CVs of 10 observers	✓	✓											
11	2.1 DECLARACION JURADA DE NO ANTECEDENTES ENG-SPA		✓											
12	2.2 Combined signed declaration of no criminal record of 10 observers		✓											
13	2.3 Combined travel documentation of 10 observers		✓											
14	2.4 Combined qualification certificates of 10 observers		✓											
15	3.1 Formación Transbordos SPRFMO ENG			✓										
16	3.2 Combined certificates of training for 10 observers			✓										
17	3.3 Observers Onboard Training Course Manual Eng			✓										
18	3.4 Curso de Entrenamiento de Observadores a Bordo			✓			✓							
19	4.1 Combined Qualifications and CV of observer trainer				✓	✓								
20	4.2 Backup Observer Trainer - RAUL DELGADO QUEZADA				✓									
21	5.1 HOJA DE ENTREGA DE EQUIPO					✓				✓				
22	5.2 POPSA_Briefing_Debriefing_with_Diagrams					✓								
23	5.3 BRIEFING & DEBRIEFING COMPLETE					✓				✓			✓	

#	Document Title	Please indicate which for which standards this document is used as evidence												
		1	2	3	4	5	6	7	8	9	10	11	12	13
24	6.1 Data Validation Manual ENG-SPA						√							
25	6.2 POPSA Business Continuity Plan ENG-SPA						√							
26	7.1 - ID Card model 2025 - Ver. 2							√						
27	7.2 Combined ID cards of 10 observers							√						
28	8.1 Deployment_Replacement_Protocols_POPSA								√					
29	8.2 INVENTARIO DE EPP POPSA								√	√				
30	10.1 Observer Misconduct Procedure (OMP) POPSA										√			
31	11.1 Dispute Resolution Protocol Eng-Spa											√		
32	12.1 Emergency Action Plan (EAP) POPSA												√	
33	13.1 Combined Insurance coverage for 10 observers													√

A summary of the evaluation is outlined in Table 2 Summary of evaluation below with more detailed comments in the main assessment.

**Table 2 Summary of evaluation**

Requirement	Total requirements	Pass	Fail
1. Impartiality, independence and integrity	5	5	0
2. Observer qualifications	1	1	0
3. Observer training	2	2	0
4. Observer trainers	1	1	0
5. Briefing and debriefing	2	2	0
6. Data validation process	10	10	0
7. Observer identification cards	1	1	0
8. Coordinating observer placements and observer deployments	4	4	0
9. Observer safety equipment	1	1	0
10. Responding to allegation of observer misconduct	1	1	0
11. Dispute settlement	1	1	0
12. Observer safety	2	2	0
13. Insurance and liability	1	1	0

## 1 Impartiality, independence and integrity

#	Minimum Standard	Pass / Fail	Evidence Provided
1.1	National observer programmes and service providers shall only deploy independent and impartial observers. This means that neither the national observer programme or service provider, as the case requires, nor the individual observers, have a direct financial interest, ownership or business links with vessels, processors, agents and retailers involved in the catching, taking, harvesting, transporting, processing or selling of fish or fish products.	(P)	<p>A sworn declaration signed by the observer programme provider (POPSA) can be found in <b>Doc 1.1</b>, declaring that POPSAs are independent providers and hold no financial ties, whether direct or indirect, to any services associated with fisheries-derived products.</p> <p>Impartiality and independence of the observers themselves is evidenced in <b>Doc 1.2</b> (a sworn declaration template) and <b>Doc 1.4</b> (10 sworn declarations signed by observers) stating that they too do not hold any financial ties to any services associated with fisheries-derived products.</p> <p>The company ownership is listed in the public register, seen in <b>Doc 1.3</b>.</p>
1.2a	The national programme or service provider, and the individual observers: a) Shall not have a direct financial interest, other than the provision of observer services, in the fisheries under the purview of the Commission, including, but not limited to: i) any ownership, mortgage holder, or other secured interest in a vessel or processor involved in the catching, taking, harvesting or processing of fish; ii) any business selling supplies or services to any vessel or processor in the fishery; iii) any business purchasing raw or processed products from any vessel or processor in the fishery.	(P)	<p>An observer contract template and 10 signed observer contracts can be seen in <b>Doc 1.6</b> and <b>Doc 1.7</b> respectively. In the first point of the paragraph labelled “<b>TERCERO</b>” (page 2), it clearly states that observers must maintain independence and impartiality at all times when carrying out their tasks.</p> <p>The company ownership is listed in the public register, seen in <b>Doc 1.3</b>.</p>

#	Minimum Standard	Pass / Fail	Evidence Provided
1.2b	Shall not solicit or accept, directly or indirectly, any gratuity, gift, favour, entertainment, inordinate accommodation, loan or anything of monetary value from anyone who either conducts activities that are regulated by a Member or CNCP connected with its services or the Commission, or has interests that may be substantially affected by the performance or non-performance of the observer's official duties;	(P)	<p><b>Doc 1.8</b> is an unsigned observer code of conduct agreement between POPSA and observers, with paragraph 3 explicitly prohibiting the acceptance of bribes and gratuities. 10 observer-signed versions of this agreement can be seen in <b>Doc 1.9</b>.</p> <p><b>Doc. 3.3</b> references bribery in the section on Professional Ethics and Conduct on Board.</p>
1.2c	Shall not serve as an observer on any vessel or at any processors owned or operated by a person who previously employed the observer in another capacity within the last three years (e.g., as a crew member)	(P)	<p>Records of observer's previous employment can be seen in the observer CVs (<b>Doc 1.10</b>), providing a means to check that no conflict exists.</p> <p>Sworn declarations by the observes <b>Doc 1.4</b> also confirm that no conflict exists and that observers will notify the competent authority should a potential conflict of interest arise (para 5).</p>

#	Minimum Standard	Pass / Fail	Evidence Provided
1.2d	Shall not solicit or accept employment as a crew member or an employee of a vessel or processor while employed by a national observer programme or service provider.	(P)	Specifically mentioned in the observer code of conduct ( <b>Doc 1.8</b> ), under paragraph 2 titled “Employment Restriction” stating that while employed by POPSA, the observer shall not solicit or accept employment as a crew member or employee of any fishing vessel.

## 2 Observer Qualifications

#	Minimum Standard	Pass / Fail	Evidence Provided
2.1	The national observer programmes or service providers shall demonstrate that observers that are recruited into their programme have relevant education or technical training and/or experience for the fleets concerned; ability to meet the observer duties described in this annex; no record of convictions calling into question the integrity of the observer or indicating a propensity towards violence; and the ability to obtain necessary documentation, including passports and visas	(P)	<p>Qualifications, medical and STCW certificates of observers <b>Doc 2.4</b></p> <p>Passports, visas and other documents are supplied in <b>Doc 2.3</b></p> <p>Self-declarations of no criminal record sent <b>Doc 2.1</b> (template) and <b>Doc 2.2</b> (signed by observers)</p>

### 3 Observer Training

#	Minimum Standard	Pass / Fail	Evidence Provided
3.1	National observer programmes or service providers shall demonstrate that observers are adequately trained before their deployment. Training shall include all the elements outlined in Annex 3 of CMM-16-2025, and that data are being collected in line with the requirements set out in CMM 02-2025	(P)	<p>An extensive observer training presentation is provided in <b>Doc 3.4</b>. Although much of it is not specific to operations within SPRFMO waters, there is specific reference to SPRFMO on slides 230 – 243, as well as an observer manual (<b>Doc 3.3</b>) detailing SPRFMO and transhipment-specific CMM 12-2024 on pages 30 - 34.</p> <p>Training certificates present in <b>Doc 3.2</b></p> <p>Sling tallying method of transhipped species' and sampling protocols are present in the observer training presentations <b>Docs 3.4 and 3.3</b>, on slides 273-275 and pages 43-44 respectively.</p>
3.2	Refresher training should be ongoing dependent on the qualification requirements. Relevant updates to CMMs and observer requirements should be communicated to observers before each deployment as part of the briefing process, for example in an updated manual	(P)	<p><b>Doc 6.1</b> Data Validation Manual states that the manual is a living document, which is reviewed at least once per year. Sources for updates include:</p> <ul style="list-style-type: none"> <li>• Changes in <b>RFMOs CMMs</b> that affect observer duties, data standards, or reporting requirements.</li> <li>• <b>National legal or regulatory changes</b> (e.g., ARAP directives, Panamanian law).</li> <li>• <b>Findings from MRAG assessments</b> or international audits.</li> <li>• <b>Internal feedback</b> from observers, coordinators, or data validators.</li> <li>• <b>Technological improvements</b> in data collection, validation, or database management.</li> </ul> <p>Approved updates are then distributed to all observers.</p>

## 4 Observer Trainers

#	Minimum Standard	Pass / Fail	Evidence Provided
4.1	National programmes or service providers shall demonstrate that observer trainers have the appropriate skills and have been authorised by that national programme or service provider to train observers	(P)	<p>Observer trainer CV and qualifications found in <b>Doc 4.1</b>, demonstrating relevant experience as Observer coordinator, although experience within SPRFMO waters is limited.</p> <p>Backup observer trainer CV and qualifications found in <b>Doc 4.2</b>, including Seamans book, observer ID card</p>

## 5 Briefing and Debriefing

#	Minimum Standard	Pass / Fail	Evidence Provided
5.1	National observer programmes or service providers shall demonstrate that there are systems for briefing and debriefing observers and communicating at any time with vessel captains.	(P)	Briefing and debriefing procedures are outlined in <b>Doc 5.2</b> , demonstrating that adequate procedures are in place.
5.2	The briefing and debriefing process shall be conducted by properly trained personnel and shall ensure that observers and vessel captains clearly understand their respective roles and duties	(P)	Qualifications and experience of the briefing/debriefing personnel are demonstrated in <b>Doc 4.1</b> . Debriefer was trained as an observer in March 2024.

## 6 Data Validation Process

#	Minimum Standard	Pass / Fail	Evidence Provided
6.1	National observer programmes or service providers shall demonstrate that they have an observer data validation process in place. The data validation process shall be conducted by properly trained personnel and shall ensure that data and information collected by an observer are checked for discrepancies or inaccuracies that are corrected before the information is entered into a database or used for analysis. This includes ensuring that the national observer programme or service provider has in place a mechanism to receive data, reports and any other relevant information from an observer in such a way that prevents interference in that data from other sources.	(P)	<p>It is clear from <b>Doc 6.1</b> that POPSA conducts a thorough review of observer data. From section 3 of this document we can see that a number of checks are carried for each observer report, as well as a number of data validation rules that are in place to mitigate errors. The data validation procedure is outlined in Section 4.3 whereby multiple stages of data checks are performed and section 4.4 details the protocol for traceability of data, whereby reviewer name, date and any corrections applied are logged.</p> <p>SPRFMO Secretariat confirmed that transhipment data have been submitted, correctly using the standard templates.</p> <p>A set of 10 observer training records is found in <b>Doc 3.2</b>.</p>
6.2	The data validation process shall ensure that the data meet the standards laid out in Annex 3 of CMM-16-2025 (Annex 3 below)	(P)	As this observer programme is for transhipments only, and therefore compliance rather than scientific monitoring, the minimum standards in this section may not apply. Evidence has been noted below where relevant.
6.2a	a) A mechanism that allows scientific data to be stored and transferred to the national observer programme (or service provider) in a secure and confidential manner	(P)	<p><b>Doc 6.1</b> Data Validation Manual includes, under <b>Section 5. Database Protocols</b> outlines the measures in place to ensure data security. This includes SSL/TLS encryption for transmission and password protection to limit access to areas of the server.</p> <p><b>Doc 6.2</b>, Business Continuity Plan contains a <b>Continuity Strategy</b> under <b>Section 6</b> which gives the procedures they have in place to back up data securely should there be a system failure.</p>
	b) Vessel information uniquely identifies the actual vessel from which the fishing occurred	(P)	<b>Doc 6.1</b> Data Validation Manual includes minimum checks (4.1) on vessel identification (vessel name, flag, IMO/UVI number).

#	Minimum Standard	Pass / Fail	Evidence Provided
	c) Dates and times of fishing effort are included and internally consistent (for example an end time should be after a start time)	(P)	<b>Doc 6.1</b> Data Validation Manual includes minimum checks (4.1) on dates and times (start and end of activities, formatted consistently (dd/mm/yyyy hh:mm))
	d) Location of fishing is included and valid (for example, logical latitude/longitude combinations), internally consistent and entered in the correct units	(P)	<b>Doc 6.1</b> Data Validation Manual includes minimum checks (4.1) on Geographical positions and the area of operation.
	e) Effort data allows quantification of the amount of effort invested by the vessel, appropriate to the fishing method used, which is also identified	(P)	<b>Doc 6.1</b> Data Validation Manual includes minimum checks (4.1) on fishing effort- gear type, number of hooks/jigs/nets, soak time, hauls, or other relevant effort indicators.
	f) Catch information identifies the fishery resource (to the species level where possible) and the quantity of that species retained or discarded. If used, species codes are accurate	(P)	<b>Doc 6.1</b> Data Validation Manual includes minimum checks (4.1) on catch data- species composition using FAO/ASFIS codes, total retained and discarded catch.
	g) Where biological or length information is collected for a fish, it is directly linked to the effort in which it was caught – including date and time, location, and fishing method information, and includes the methodology of data collection	(P)	N/A
	h) If the observer programme extends to transhipment and/or landings, then the amount and species of fishery resources transhipped/landed is quantified and recorded according to a standard methodology	(P)	Data collection protocol in observer training on the collection of data, as well as a transhipment observer log sheet is shown on slide 248 of the observer training presentation ( <b>Doc 3.4</b> ). A few different log sheet are present, one for internal use within POPSA and the other one that POPSA submit to ARAP following observer debrief, in which the observer must collect data following a standard methodology. These log sheets are on slides 345, 346, and 347.

#	Minimum Standard	Pass / Fail	Evidence Provided
	i) Interaction data involving marine mammals, seabirds, reptiles and/or other species of concern identifies the individual species (where possible), the number of animals, fate (retained or released/discard), life status if released (vigorous, alive, lethargic, dead), and the type of interaction (hook /line entanglement / warpstrike / net capture / other).	(P)	N/A

## 7 Observer Identification Cards

#	Minimum Standard	Pass / Fail	Evidence Provided
7.1	National observer programmes or service providers shall provide observers with identification cards that include the full name of the observer, date of issue and expiration, the name of the national observer programme or service provider, a unique identifying number (if issued by the national observer programme or service provider) a passport style photo of the observer, an emergency phone number	(P)	<p>Doc 7.1 is an observer ID card template with the full name of the observer, date of issue, expiry date, company name, unique identifier, passport-style photo and emergency contact number.</p> <p>The ID cards of 10 observers following the template of Doc 7.1 can be seen in Doc 7.2.</p>

## 8 Coordinating Observer Placements and Observer Deployments

#	Minimum Standard	Pass / Fail	Evidence Provided
8.1	National observer programmes or service providers shall demonstrate responsibility and capacity for the timely deployment of observers and will ensure that the selected observer receives all possible assistance during the entire length of their placements	(P)	Observer deployment protocol is outlined in <b>Doc 8.1</b> , whereby POPSA aim to assign an observer within a 72-hour period (Section 1, Paragraph 2). It is also stated in Section 1, paragraph 5 that POPSA shall maintain a 24/7 communication channel with the observer.
8.2	National observer programmes or service providers shall have in place a protocol to replace an observer if the observer becomes unable to perform their duties.	(P)	Observer replacement protocol outlined in <b>Doc 8.1</b> Section 2, whereby observers will be replaced for medical emergencies, compassionate grounds, breach of professional duties, misconduct or imminent danger.
8.3	National observer programmes or service providers shall also seek, to the extent possible, to avoid deploying a single observer on multiple consecutive trips on the same vessel	(P)	Detailed in <b>Doc 8.1</b> Section 3, POPSA's information system includes automated alerts that trigger if a consecutive assignment to the same vessel is detected, which can then be amended before deployment.
8.4	It is the responsibility of a national observer programme or service provider to administer observer placements, to maintain the independence and impartiality of observers as described in this measure and ensure that all placements are administratively finalised as soon as practicable after the observers return to port. The national observer programme or service provider is expected to communicate with the observer regarding upcoming deployments, coordinate observer travel, and provide the necessary supplies for observer duties.	(P)	The responsibility of the observer service provider to maintain independence and impartiality is evidenced through <b>Doc 1.1</b> and <b>Doc 1.4</b> , sworn declarations by POPSA and the observers. Completed debriefing form provided ( <b>Doc 5.3</b> ) demonstrating that the necessary supplies for performing observer duties are supplied to the observers. <b>Doc 8.2</b> contains the POPSA equipment inventory, listing the quantity of deployed and available equipment (Sheet EPP), and contacts for purchasing replacements (Sheet CONTACTOS DE COMPRA).

## 9 Observer Safety Equipment

#	Minimum Standard	Pass / Fail	Evidence Provided
9.1	National observer programmes or service providers must demonstrate that observers are provided with appropriate equipment, including safety equipment, which is in good working order, routinely checked and renewed to carry out their duties on board a vessel. Essential equipment includes a lifejacket, independent two-way communication device capable of sending and receiving voice or text communications, personal locator beacons (PLBs), immersion suits, hard hat, proper deck working boots or shoes, gloves and protective glasses (including sunglasses)	(P)	<p>Evidence from the equipment inventory <b>Doc 8.2</b> that POPSA has independent 2-way communications device, PLBs, hard-hats, protective glasses, gloves.</p> <p>From email comms with Raul Delgado from POPSA, they confirmed that deck-working boots are purchased by the observers and reimbursed by POPSA.</p> <p><b>Doc 5.1</b> provides a document for observers to sign equipment in and out (as part of the briefing / debriefing process).</p> <p>Completed briefing/debriefing forms provided (<b>Doc 5.3</b>) shows emergency equipment is being issued to observers.</p>

## 10 Responding to Allegations of Observer Misconduct

#	Minimum Standard	Pass / Fail	Evidence Provided
10.1	National observer programmes or service providers must establish procedures for preventing, investigating, and reporting on the misconduct of observers, in coordination with observers, vessel captains, and relevant Members and CNCPs	(P)	A clear misconduct procedure is outlined in paragraph 3 of <b>Doc 10.1</b> , listing 6 key steps; Initial Reporting, Record, Investigation, Immediate Measures, Resolution and Possible Sanctions. Misconduct procedures are explained to observers in the observer code of conduct <b>Doc 1.8</b> paragraph 5.

## 11 Dispute Settlement

#	Minimum Standard	Pass / Fail	Evidence Provided
11.1	National observer programmes or service providers shall demonstrate the existence of a dispute resolution process fair to all parties that provides a process to resolve issues through appropriate means including facilitation and mediation	(P)	A clear dispute resolution protocol is presented in <b>Doc 11.1</b> , which aims to resolve disputes among vessel staff, observers, POPSA and stakeholders in an impartial and timely manner.

## 12 Observer Safety

#	Minimum Standard	Pass / Fail	Evidence Provided
12.1	National programmes or service providers must demonstrate that procedures are in place to support observers in their ability to carry out their duties unimpeded and in a safe working environment, including an established Emergency Action Plan (EAP). The EAP must provide instructions on sending reports to the provider's designated 24-hour point(s) of contact to report unsafe conditions, including instances of harassment, intimidation or assault.	(P)	Doc 12.1 is the POPSA emergency action plan, detailing emergency contact numbers, which are available 24/7, as well as the emergency response procedure in paragraph 3. Completed debriefing forms ( <b>Doc 5.3</b> ) show emergency equipment is deployed, however, clear training on its use – as well as maintenance records – is limited.
12.2	National observer programmes or service providers must also provide a permanent delegate or supervisor on land to communicate with the observer at any time while at sea	(P)	Contact details of 24/7 programme supervisors are available in the table found in <b>Doc 12.1</b> .

## 13 Insurance and Liability

#	Minimum Standard	Pass / Fail	Evidence Provided
13.1	National observer programmes or service providers must demonstrate that observers have health, safety and liability insurance commensurate with the national standards of the observer programme or service provider for such insurance for the duration of any deployment before placing the observer on a vessel.	(P)	The folder <b>Combined Insurance coverage for 10 observers</b> contains evidence that observers are insured under the required standards. All are insured in what appears to be a per-deployment basis.



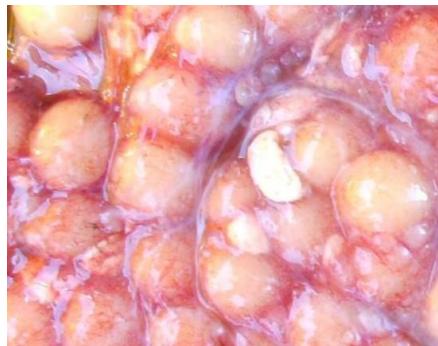


# SPRFMO Observer Programme Accreditation Assessment



## Final Evaluation Report Russian Federation

December 2025



**Teresa ATHAYDE**

Individual Consultant



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Teresa Athayde is an independent international fisheries consultant dedicated to promoting sustainable, science-based fisheries management and the responsible use of marine resources.

As the founder of **SeeMORE – Marine Observation**

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## Introduction

The South Pacific Regional Fisheries Management Organisation (SPRFMO) is an inter-governmental organisation that is committed to the long-term conservation and sustainable use of the fishery resources of the South Pacific Ocean and, in so doing, safeguarding the marine ecosystems in which the resources occur. The SPRFMO Convention applies to the high seas of the South Pacific, covering about a fourth of the Earth's high seas areas.

Currently, the main commercial resources fished in the SPRFMO Convention Area are jack mackerel and jumbo flying squid in the Southeast Pacific and, to a much lesser degree, deep-sea species often associated with seamounts in the Southwest Pacific.

The Organisation consists of a Commission and a number of subsidiary bodies. The Commission currently has 17 Members (Australia, Belize, the Republic of Chile, People's Republic of China, the Cook Islands, the Republic of Cuba, the Republic of Ecuador, the European Union, the Kingdom of Denmark in respect of the Faroe Islands, the Republic of Korea, New Zealand, the Republic of Peru, the Russian Federation, Chinese Taipei, the United States of America and the Republic of Vanuatu). The Commission also has two Cooperating non-Contracting Parties (Country of Curaçao and Republic of Liberia).

From 1st January 2027, SPRFMO Members and CNCPs shall only deploy observers from national observer programmes or service providers accredited under the SPRFMO Observer Programme<sup>1</sup>. Observer programmes may be accredited under the SPRFMO Observer Programme for a maximum of 5 years from the date upon which accreditation is granted before undergoing re-evaluation<sup>2</sup>. This document, consistent with the process outlined in CMM 16-2025 (SPRFMO Observer Programme), provides the basis for the accreditation process and the collection of information required for that process.

This report is the final report for the Russian Federation. The current report includes an evaluation of all the information received.

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<sup>1</sup> CMM 16-2025 Para 56. *Members and CNCPs may continue using their own non-accredited national observer programme or service provider to meet observer coverage requirements until 31 December 2026. From 1 January 2027 Members and CNCPs shall only deploy observers from national observer programmes or service providers accredited under the SPRFMO.*

<sup>2</sup> CMM 16-2025 Para 36. *If the Final Evaluation Report by the SPRFMO OP Accreditation Evaluator is favourable, the Commission may decide to adopt the report and grant accreditation under the SPRFMO OP for 5 years from the date upon which accreditation is granted. For Members whose programmes were granted accreditation by the Commission by the close of its 12th Meeting, such accreditation shall have an automatic extension of 3 years.*

## Accreditation Process

The accreditation process for the Russian Federation progressed as follows:

Proposed date	Actions	Actual date
Annual Commission Meeting	Members, CNCPs or service providers (applicant) provided notification of intention to be assessed.	17/02/2025
Following Annual Commission Meeting	SPRFMO Secretariat asked applicants to provide points of contact for provision to the Assessor (Reference Letter G37-2025)	15/04/2025
Following the providing of contact for provision to the Assessor	Russian Federation confirmed its interest in seeking accreditation in 2025	01/05/2025
Planning meeting (July/August)	Assessor and SPRFMO Secretariat to meet virtually to confirm implementation of the process flow	25/07/2025
Following the notification of points of contact	Assessor (T. ATHAYDE) contacts Member CNCP or service provider	02/08/2025
	Assessor (T. ATHAYDE) contacts Member, CNCP or service provider and agrees a timetable for the assessment process (Starting at time T) and shares the assessment guidelines.	08/09/2025
T + 0 days (start of process)	Assessment process to begin with Member, CNCP or service provider	08/09/2025
T + 14 days	Member, CNCP or service provider provides all required documentation to assessor, in country visits or online meetings take place to discuss information provided by Member, CNCP or service provider. Assessor may request additional documentation if substantive or essential information is missing	07/10/2025
T + 28 days	Assessor (T. ATHAYDE) reviews all material and completes its preliminary evaluation.	06/11/2025
At least 120 days before Annual Commission Meeting (i.e. by 2 November 2025)	Member, CNCP or service provider will be offered 30 days for Bilateral consultations to ensure that they have an opportunity to provide additional information and corrections relevant to their evaluation	07/11/2025
90 days before Annual Commission Meeting (i.e. by 2 December 2025)	Assessor (T. ATHAYDE) provides Preliminary Final Evaluation Report to Applicant and Secretariat for feedback.	25/11/2025
60 days before Annual Commission Meeting (i.e. by 31st December 2025)	The assessor (T. ATHAYDE) provides the Final Evaluation Report to the Applicant and Secretariat, including recommended conditions and incorporating feedback received on the preliminary evaluation.	09/12/2025
Annual Commission Meeting (2 March 2026)	The Commission evaluates all reporting and recommendations and will decide whether to grant accreditation (including specified conditions).	

## Executive Summary

Russian Federation observers are supplied through the Atlantic Branch of the Federal State Budgetary Scientific Institution (FSBSI) All-Russian Research Institute of Fisheries and Oceanography (VNIRO) — hereinafter referred to as “AtlantNIRO”. Materials for the assessment were provided by AtlantNIRO, based on the national observer programme, with specific adaptations for SPRFMO observer deployments as required.

The notification of intention to be assessed was submitted on 17 February 2025 and confirmed on 1 May 2025. Due to a change of SPRFMO Executive Secretary, a meeting with the incoming Executive Secretary took place on 25 July 2025. Email to establish contact was sent by the assessor (T. Athayde) to AtlantNIRO on 2 August 2025. Summer holidays delayed agreement on a timetable for the assessment process until 8 September 2025, when the assessment formally began.

By 7 October 2025, the Russian Federation had provided the majority of the required documentation in both Russian and English. Additional documents were requested where essential information was missing. In total, 100 documents were submitted, detailing the activities of its observer programme relevant to the SPRFMO, some addressing multiple accreditation criteria. The documents were clearly labelled and followed the structure specified in the requirements. The assessor found the materials very comprehensive, covering all elements required for accreditation. Although 84 documents were originally in Russian, the majority had been translated into English using Google Translate. Cooperation with AtlantNIRO was excellent, and any additional clarifications were promptly provided via email.

The following sections break down the materials submitted by the Russian Federation against the accreditation criteria, with brief comments where appropriate. A summary of the evaluation is presented in the Table provided below. More detailed comments are included in the main assessment.

#	Minimum Standard	Total requirements	Pass	Pass with conditions	Fail
1	Impartiality, independence and integrity	5	5	0	0
2	Observer qualifications	1	1	0	0
3	Observer training	2	2	0	0
4	Observer trainers	1	1	0	0
5	Briefing and debriefing	2	2	0	0
6	Data validation process	2	2	0	0
7	Observer identification cards	1	1	0	0
8	Coordinating observer placements and observer deployments	4	4	0	0
9	Observer safety equipment	1	1	0	0
10	Responding to allegation of observer misconduct	1	1	0	0
11	Dispute settlement	1	1	0	0
12	Observer safety	2	2	0	0
13	Insurance and liability	1	1	0	0

## Evidence submitted

Documents submitted by the Russian Federation that contain evidence of conformance with the SPRFMO assessment requirements are listed in the table below. The relevant sections of these documents are referenced in the main evaluation tables 1-13.

## SPRFMO Observer Programme Accreditation Final Evaluation – Russian Federation

## SPRFMO Observer Programme Accreditation Final Evaluation – Russian Federation

#	Document Title	Standards for which documents are used as evidence										
		1	2	3	4	5	6	7	8	9	10	11
39	03.19 Training Section 10_02 Bycatch (EN/RU)		x	x								
40	03.20 Training Section 10_03 Biology works (EN/RU)		x	x								
41	03.21 Training Section 10_04 Squids (EN/RU)		x	x								
42	03.22 Training Section 10_05 Squid works (EN/RU)		x	x								
43	03.23 Training Section 11 Ichtyofauna (EN/RU)		x	x								
44	03.24 Training Section 12_01 Birds and mammals (EN/RU)		x	x								
45	03.25 Training Section 12_02 Safe Handling Protocol (EN/RU)		x	x								
46	03.26 Certificate SPRFMO Scientific Observer Observer1 2024 (EN)			x								
47	03.27 Certificate SPRFMO Scientific Observer Observer3 2024 (EN)			x								
48	03.28 Certificate SPRFMO Scientific Observer Observer2 2024 (EN)			x								
49	04.01 CV Observer coordinator, trainer and briefer (EN/RU)				x	x						
50	04.02 CV Observer trainer, briefer/debriefer, and data validator (EN/RU)				x	x	x					
51	05.01 Protocol for briefing and report review (EN/RU)			x		x						
52	05.02 Briefing Observer1 2024 (EN/RU)			x		x						
53	05.03 Briefing Observer2 2024 (EN/RU)			x		x						
54	05.04 Briefing Observer3 2024 (EN/RU)			x		x						
55	05.05 Trip assignment UVTO 2024 Observer1 (EN/RU)				x			x				x
56	05.06 Report UVTO 2024 Observer1 (EN/RU)					x	x		x			
57	05.07 Extract of Academic Council meeting 1 Observer2 2024 (EN/RU)					x						
58	05.08 Extract of Academic Council meeting 2 Observer3 2024 (EN/RU)					x						
59	05.09 Extract of Academic Council meeting 3 Observer1 2024 (EN/RU)					x						

## SPRFMO Observer Programme Accreditation Final Evaluation – Russian Federation

SPRFMO Observer Programme Accreditation Final Evaluation – Russian Federation

#	Document Title	Standards for which documents are used as evidence											
		1	2	3	4	5	6	7	8	9	10	11	12
81	02.05_01 Medical book Observer3 (RU)		x										
82	02.05_01a Medical book Observer3 details (EN)		x										
83	02.06_01 Medical book Observer2 (RU)		x										
84	02.06_01a Medical book Observer2 details (EN)		x										
85	05.07_01 Extract of Academic Council meeting 1 Observer2 2024 (EN/RU)				x			x					
86	05.08_01 Extract of Academic Council meeting 2 Observer3 2024 (EN/RU)				x			x					
87	05.09_02 Extract of Academic Council meeting 3 Observer1 2024 (EN/RU)				x			x					
88	05.10 Email AtlantNIRO Vessels Contact Details 27 Oct 2025 (EN)				x								
89	5-9-12 Email AtlantNIRO 22 Oct 2025 (EN)				x			x				x	
90	06.08 CMM02-Observer-Trawl-template-Explanatory-May2018 (EN)					x							
91	06.09 SPRFMO Transhipment-Template-Explanatory-2020 (EN)					x							
92	06.10 SPRFMO-Landings-template-2020 (EN)					x							
93	06.11 SPRFMO-Landings-data-notes-2020 (EN)					x							
94	06.11 SPRFMO-Observer Trawl Template Vessel1 2025-6-10 (EN)					x							
95	06.12 SPRFMO-Landings-template-2024 Vessel1 2025-6-10 (EN)					x							
96	01.09 Declaration observer template 2025 (EN/RU)	x											
97	10-11 Code of Discipline and Ethics for Scientific observers 2025 (EN/RU)	x								x			
98	05.011 Captain Briefing Protocol Template 2025 (EN/RU)				x								
99	09-12 MoU deployment observers 2025 (EN/RU)				x				x				
100	12.01 Emergency Action Plan EAP-OBS-RU 2025 (EN/RU)										x		x

## Scoring Matrix – Interpretation

The scoring matrix presented in the following section provides an assessment of the Russian Federation (RF) Observer Programme (OP) against the SPRFMO minimum standards. The matrix is structured into seven columns:

- **Requirement** – The number (#) and definition of the requirement to meet the minimum standard defined.
- **Assessment (Pass/Fail)** – A simple indicator, colour coded green for “Pass”, red for “Fail”.
- **Supporting Documents (SD)** – Document numbers as referenced in Table 1
- **Findings / Analysis (F/A)** – Evidence that the observer programme/provider meets the minimum standard, or requirement under the standard. Comments from the evaluator on the evidence provided. Identified gaps. Reason for passing or for failing a requirement, or for being given a condition to pass it.
- **Recommendation** – Details on the conditions that can be addressed before the final assessment to overcome the identified gap.
- **Follow-up Actions** – Details how the Observer Programme/Provider being accessed proposes to address the condition to overcome the identified gap before the final assessment.
- **Good practices** – Examples of good practice- among the elements that have been passed – highlighted by the evaluator for other programmes to follow.

Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
X.X Observer programmes must XXX.	P	D# D#-D#	<p>The following evidence was submitted to demonstrate compliance with standard X.X:</p> <ul style="list-style-type: none"> <li>• The Observer Programme XXX (D#, D#).</li> </ul> <p>The requirements set out are clearly demonstrated in section 22 of document 3 and part 4 of document 4.</p>	To achieve full alignment with the standard the following is recommended: XX	To achieve full alignment with the standard the OP: XX	The OP XXX. This approach represents a best-practice model for other programmes to follow.

**Table 1. Impartiality, Independence and Integrity**

Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
1.1 National observer programmes and service providers shall only deploy independent and impartial observers. This means that neither the national observer programme or service provider, as the case requires, nor the individual observers, have a direct financial interest, ownership or business links with vessels, processors, agents and retailers involved in the catching, taking, harvesting, transporting, processing or selling of fish or fish products.	<b>P</b>	D1-D4 D6-D8 D72 D96 D97	<p>The following evidence was submitted to demonstrate compliance with the requirement:</p> <ul style="list-style-type: none"> <li>• AtlantNIRO operates as a non-profit scientific organization (<b>D1-D2</b>).</li> <li>• <i>Contract agreements with fishing companies</i> (<b>D3-D4</b>) are limited to observer services and state monitoring; functions are part of statutory mandate.</li> <li>• Observers sign <i>Declarations of Integrity and Impartiality</i> (<b>D6-D8</b>) and adhere to the <i>Disciplinary and Ethical Code for Scientific Observers</i>. (<b>D72</b>).</li> <li>• <i>Contract agreements with fishing companies</i> (<b>D3, D4</b>) explicitly address observer and contractor impartiality and prohibition of solicitation (Clause 3.2.5, p.5).</li> </ul> <p>AtlantNIRO maintains institutional and individual observer independence.</p> <p>Contractual, declaratory, and ethical safeguards ensure impartiality and prevent financial or business conflicts.</p> <p>The 2024 version of the <i>Disciplinary and Ethical Code for Scientific Observers</i> (D72) currently lacks explicit prohibitions on</p>	<p>To achieve full alignment with the standard the following is recommended:</p> <p>Amend the <i>Code of Discipline and Ethics</i> (<b>D72</b>) and <i>Observer Declarations of Integrity and Impartiality</i> (<b>D6-D8</b>) to include a dedicated “<i>Conflict of Interest</i>” section explicitly prohibiting financial interests and employment relationships.</p>	<p>Amended versions of the <i>Code of Discipline and Ethics</i> (<b>D97</b>) inclusive of a dedicated “<i>Impartiality and Conflict of Interest</i>” section (Appendix D); and of the <i>Declaration of Integrity and Impartiality of a Scientific Observer</i> template (<b>D96</b>) inclusive of a paragraph explicitly prohibiting financial interests and employment relationships (p. 4) was provided by AtlantNIRO.</p> <p>Amended versions will enter into use in 2026, thereby allowing the programme to</p>	<p>AtlantNIRO strengthens its observer programme by adding an impartiality clause to vessel contracts, prohibiting any solicitation related to observer services.</p> <p>Observers sign Declarations of Integrity and Impartiality and follow a comprehensive Disciplinary and Ethical Code. These measures provide a strong model for transparent and accountable programmes.</p>

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Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
			financial interests.		achieve full alignment with the requirement.	
1.2 The national programme or service provider, and the individual observers:  a) Shall not have a direct financial interest, other than the provision of observer services, in the fisheries under the purview of the Commission, including, but not limited to:  i) any ownership, mortgage holder, or other secured interest in a vessel or processor involved in the catching, taking, harvesting or processing of fish; ii) any business selling supplies or services to any vessel or processor in the fishery; iii) any business purchasing raw or processed products from any vessel or processor in the fishery.	P	D1-D8 D24 D72	<p>The following evidence was submitted to demonstrate compliance with the requirement:</p> <ul style="list-style-type: none"> <li>• AtlantNIRO operates as a non-profit scientific organization (<b>D1-D2</b>).</li> <li>• <i>Contract agreements with fishing companies</i> prohibit financial interests beyond observer remuneration (<b>D3-D4</b>, Clause 3.2.5).</li> <li>• Observers sign <i>Declarations of Integrity and Impartiality</i> (<b>D6-D8</b>).</li> <li>• <i>AtlantNIRO Declaration of Honesty and Impartiality</i> (<b>D5</b>) confirms no financial, ownership, or business relationships with fisheries entities.</li> <li>• <i>Observer training materials</i> (<b>D24</b>) reinforce financial independence.</li> <li>• <i>Disciplinary and Ethical Code for Scientific Observers</i> (<b>D72</b>) emphasizes behavioural impartiality but lacks explicit structural safeguards on financial interests.</li> </ul> <p>Documentation demonstrates substantial conformity. Institutional and individual safeguards prevent financial interests in fisheries.</p>	NA	NA	Same as above

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Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
b) Shall not solicit or accept, directly or indirectly, any gratuity, gift, favour, entertainment, inordinate accommodation, loan or anything of monetary value from anyone who either conducts activities that are regulated by a Member or CNCP connected with its services or the Commission, or has interests that may be substantially affected by the performance or non-performance of the observer's official duties;	P	D3 D4 D6-D8 D24 D72 D96 D97	<p>The following evidence was submitted to demonstrate compliance with the requirement:</p> <ul style="list-style-type: none"> <li>• <i>Observer training materials (D24)</i> and contracts with vessel representatives (<b>D3-D4</b>, Clause 3.2.5) explicitly prohibit solicitation or acceptance of gifts, gratuities, employment offers, or other items of monetary value.</li> <li>• <i>Observer training materials (D24)</i> instruct observers to immediately report any offers through established reporting channels.</li> <li>• <i>Observers Declarations of Integrity and Impartiality (D6-D8)</i> indicate violations constitute serious disciplinary offences, including suspension, dismissal, and legal liability.</li> <li>• <i>Disciplinary and Ethical Code for Scientific Observers (D72)</i> emphasizes behavioural impartiality but does not explicitly enumerate gifts or monetary benefits as a distinct violation.</li> </ul> <p>Documentation confirms clear rules prohibiting solicitation or acceptance of gifts or gratuities. Contractual, declaratory, and training safeguards support observer accountability and impartiality.</p> <p><i>Code of Discipline and Ethics for Scientific</i></p>	<p>Amend the <i>Disciplinary and Ethical Code for Scientific Observers (D72)</i> to include a dedicated “Gifts” section explicitly prohibiting acceptance or solicitation of gifts, gratuities, or monetary benefits.</p> <p>The amended <i>Declaration of Integrity and Impartiality of a Scientific Observer template (D96)</i> also includes a paragraph on this (p. 6).</p> <p>AtlantNIRO committed to use documents amended versions from 2026, thereby achieving full alignment with the requirement.</p>	<p>Paragraph 4, Appendix D of the amended version of the <i>Disciplinary and Ethical Code for Scientific Observers (D97)</i> explicitly prohibits acceptance or solicitation of gifts, gratuities, or monetary benefits.</p> <p>The amended <i>Declaration of Integrity and Impartiality of a Scientific Observer template (D96)</i> also includes a paragraph on this (p. 6).</p> <p>AtlantNIRO committed to use documents amended versions from 2026, thereby achieving full alignment with the requirement.</p>	Same as above

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Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
			<i>observers (D72)</i> emphasizes behavioural impartiality but do not enumerate gifts or monetary benefits as a distinct violation.			
c) Shall not serve as an observer on any vessel or at any processors owned or operated by a person who previously employed the observer in another capacity within the last three years (e.g., as a crew member)	P	D3 D4 D9-D11 D24 D76-D78	<p>The following evidence was submitted to demonstrate compliance with the requirement:</p> <ul style="list-style-type: none"> <li>• <i>Contract agreements with fishing companies (D3-D4, Clause 3.2.5)</i> explicitly prohibit assigning an observer to a vessel or processing facility owned or operated by a person who employed that observer in another capacity within the previous three years.</li> <li>• <i>Observer training materials (D24, Section 01 – Observer System)</i> reinforce this requirement.</li> <li>• <i>Observer workbooks (D9-D11) and observer work certifications (D76–D78)</i> provide documented evidence of previous employment and confirm observers' tenure with AtlantNIRO since 2019.</li> </ul> <p>Documentation demonstrates that the national observer programme has established clear procedures to prevent potential conflicts of interest arising from prior employment. Contractual provisions, training materials, and employment records collectively ensure compliance with the three-year restriction.</p>	NA	NA	Same as above

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Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
d) Shall not solicit or accept employment as a crew member or an employee of a vessel or processor while employed by a national observer programme or service provider.	P	D3 D4 D24 D72 D96 D97	<p>The following evidence was submitted to demonstrate compliance with the requirement:</p> <ul style="list-style-type: none"> <li>• <i>Contract agreements with fishing companies (D3-D4, Clause 3.2.5)</i> explicitly prohibit observers from seeking or accepting employment as a crew member or employee of any vessel or processing facility while engaged under the observer programme.</li> <li>• <i>Observer training materials (D24, Section 01 – Observer System)</i> reinforce this requirement.</li> <li>• <i>Disciplinary and Ethical Code for Scientific Observers (D72)</i>.</li> </ul> <p>Documentation demonstrates that the national observer programme has implemented clear rules preventing observers from seeking or accepting employment with monitored vessels or processors during deployment, ensuring professional independence and preventing conflicts of interest.</p> <p>The <i>Disciplinary and Ethical Code for Scientific Observers (D72)</i> does not explicitly include a provision prohibiting dual employment.</p>	<p>Amend the <i>Disciplinary and Ethical Code for Scientific Observers (D72)</i> to include a specific rule explicitly prohibiting observers from seeking or accepting employment with any vessel or processor while engaged in the observer programme.</p>	<p><i>Appendix D (p. 3-4), of the amended Disciplinary and Ethical Code for Scientific Observers (D97)</i> explicitly prohibits observers from seeking or accepting employment with any vessel or processor while engaged in the observer programme. A paragraph on this (p. 7) was also included to the amended template of the <i>Declaration of Integrity and Impartiality of a Scientific Observer (D96)</i>. From 2026, the amended documents will be in use, ensuring programme alignment.</p>	Same as above

**Table 2. Observer Qualifications**

Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
2.1 The qualification of individual observers is the responsibility of national observer programmes or service providers.  The national observer programmes or service providers shall demonstrate that observers that are recruited into their programme have: <ul style="list-style-type: none"> <li>relevant education or technical training and/or experience for the fleets concerned;</li> <li>ability to meet the observer duties;</li> <li>no record of convictions calling into question the integrity of the observer or indicating a propensity towards violence; and the</li> <li>ability to obtain necessary documentation, including passports and visas.</li> </ul>	<b>P</b>	D6-D20  D22  D24-D45  D79-D84	<p>The following evidence was submitted to demonstrate compliance with the requirement:</p> <ul style="list-style-type: none"> <li><i>Observer professional profiles (D9–D11) and CVs (D15–D17)</i>, document relevant education, technical training, and at-sea experience for the mid-water trawl fleet.</li> <li><i>Observer documentation (D12–D14, D79–D84)</i> confirms possession of valid national ID, passports, seaman's books, vaccination certificates, STCW basic safety training, and annual medical records; as well as observer ability to obtain these documents..</li> <li><i>Observer police clearance certificates (D18–D20)</i> demonstrate no convictions affecting integrity or indicating propensity toward violence.</li> <li><i>Observer Training Program (D22, D24–D45)</i> provides structured training covering all observer duties per Annex 1 of CMM 16-2025, including professional competencies, conservation compliance, and scientific data collection.</li> <li>Observers sign <i>Declarations of Integrity and Impartiality (D6–D8)</i>, committing to avoid and report</li> </ul>	NA	NA	<ul style="list-style-type: none"> <li>- Observers maintain seaman's books, valid STCW safety training, and yearly medical certificates.</li> <li>- Annual police clearances confirm no integrity-related convictions.</li> <li>- Observers sign the Integrity and Impartiality Declaration annually.</li> </ul>

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	<p>conflicts of interest.</p> <p>The national observer programme demonstrates that observers recruited into the programme exceed SPRFMO minimum competency requirements.</p> <p>Evidence shows that observers possess relevant education, technical training, and operational experience; hold all necessary documentation; have no integrity or criminality concerns; and receive comprehensive training ensuring ability to perform all observer duties effectively.</p> <p>The <i>Observer Declaration of Integrity and Impartiality</i> further reinforces professional and ethical standards.</p>		
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**Table 3. Observer Training**

Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
3.1 National observer programmes or service providers shall demonstrate that observers are adequately trained before their deployment. Training shall include all the elements outlined in Annex 3 of CMM-16-2025, and that data are being collected in line with the requirements set out in CMM 02-2025	<b>P</b>	D15-D17 D21-D48	<p>The following evidence was submitted to demonstrate compliance with the requirement:</p> <ul style="list-style-type: none"> <li>• <i>Observers' CVs</i> confirming relevant higher education and sea experience (<b>D15–D17</b>).</li> <li>• <i>2024 Scientific Observer Training and Certification Protocol</i> (<b>D21</b>) defining training standards, assessment, and certification.</li> <li>• <i>2024 Observer Training Programme</i> (<b>D22</b>) providing structured, annual curriculum.</li> <li>• <i>2024 Observer training materials</i> (<b>D24–D45</b>) covering theory, practical skills, and operational procedures.</li> <li>• <i>Observer training attestations and certificates</i> (<b>D23, D46–D48</b>) confirming completion and annual certification.</li> </ul> <p>The national observer programme maintains a comprehensive, structured, and standardized in-house observer training programme aligned with SPRFMO standards and Annex 1 of CMM 16-2025.</p> <p>Training is delivered annually prior to deployment, and observer certification remains valid for one year. Through this training,</p>	NA	NA	- The training framework is adaptable and maintains high standards in safety, skills, and data collection.

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	<p>observers acquire the theoretical knowledge, practical skills, and operational competencies necessary to effectively carry out their duties aboard mid-water trawl vessels operating within the SPRFMO Convention Area.</p> <p>Evidence demonstrates that training content, assessment, and certification procedures are objective, documented, and consistently applied.</p> <p>The <i>Observer Training Programme (D22)</i> outlines the areas covered in the training. However, it does not include the following training requirements listed in Annex 3 of CMM-16-2025:</p> <ul style="list-style-type: none"><li>• The relationship between fisheries science and fisheries management, and the importance of data collection;</li><li>• Use and maintenance of sampling equipment (e.g., scales, callipers);</li><li>• Understanding potential biases in sampling;</li><li>• Use of electronic monitoring systems where applicable.</li></ul> <p>These omissions were justified via email, noting that observers had already demonstrated competence in these areas a claim verified through the inspection of Observer CVs (<b>D15–D17</b>) and professional profiles (<b>D9–D11</b>).</p> <p>It was also noted that Observers receive onboard training on electronic monitoring systems, provided by shipboard specialists,</p>		
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	<p>when such systems are present, which is not currently the case.</p> <p>Furthermore, the <b>programme does not include</b> training on the <b>identification of Vulnerable Marine Ecosystems (VMEs)</b> or <b>sea turtles</b>, nor on <b>sea turtle handling and release protocols</b>. This omission is <b>justified by the absence of these taxa in the catches of the Russian mid-water trawl fleet</b>.</p> <p>It was also clarified that AtlantNIRO provides ongoing support to at-sea observers, including access to specialist assistance for identifying previously unknown species (e.g. VMEs and sea turtles) and guidance on proper handling and release when needed.</p> <p><b>Gear training</b> adequately <b>covers the principal mid-water trawl sector</b> and provides context for squid-jigger fisheries. However, <b>it does not cover other SPRFMO gears</b>. This is <b>considered appropriate as the programme focuses on the main fisheries observers are expected to encounter</b>.</p> <p>Annual refresh training allows updates should fleet composition, gear, target species, or observer competencies change.</p> <p>The programme comprehensively addresses electronic equipment use (<b>D33–D34</b>) and is supplemented by scientific fundamentals, including commercial oceanography, Southeast Pacific hydrometeorology (<b>D35–D36</b>), and practical instructions for additional hydro-</p>		
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			meteorological observations ( <b>D37</b> ). These elements go beyond standard requirements. Observers possess formal, internationally recognized training in maritime safety, including emergency procedures, survival techniques, conflict management, first aid for remote conditions, and MARPOL requirements, certified under Basic Safety and Security Awareness standards ( <b>D9–D11</b> ). Overall, the training framework demonstrates adaptability and continuous improvement, remaining aligned with operational realities and evolving programme needs while maintaining high standards for safety, technical competence, and scientific data collection.			
3.2 Refresher training should be ongoing dependent on the qualification requirements. Relevant updates to CMMs and observer requirements should be communicated to observers before each deployment as part of the briefing process, for example in an updated manual	<b>P</b>	D46-D48 D51-D54	<p>The following evidence was submitted to demonstrate compliance with the requirement:</p> <ul style="list-style-type: none"> <li>• <i>Refresher training</i> provided annually, aligned with qualification expiration (<b>D46–D48</b>).</li> <li>• <i>Pre-deployment briefings</i> (<b>D51–D54</b>) cover updates to CMMs and operational changes.</li> </ul> <p>Observers maintain current competencies and certifications through the structured Observer Training Programme and annual refresher courses, ensuring their skills remain up to date. They are regularly informed of regulatory changes and operational requirements, and have demonstrated competence for deployment in the fisheries under their responsibility.</p>	NA	NA	- Annual refresh training ensures continued competency.

**Table 4. Observer Trainers**

Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
4.1 National programmes or service providers shall demonstrate that observer trainers have the appropriate skills and have been authorised by that national programme or service provider to train observers.	<b>P</b>	D21 D22 D49–D50	<p>The following evidence was submitted to demonstrate compliance with the requirement:</p> <ul style="list-style-type: none"> <li>• <i>Training program for scientific observers to work on trawl vessels in SPRFMO regulatory area (D21-D22)</i></li> <li>• <i>Observer Trainers CVs demonstrating qualifications and experience (D49–D50).</i></li> </ul> <p>Evidence confirms that both trainers are formally trained and authorised by AtlantNIRO to train Observers. Trainers possess extensive skills and experience, including:</p> <ul style="list-style-type: none"> <li>• Management and optimisation of national observer programme on international contexts;</li> <li>• Development and delivery of observer training curricula;</li> <li>• Practical at-sea data collection and fisheries monitoring expertise;</li> <li>• Participation into annual advanced “Training of Observers” courses across multiple regulatory areas;</li> <li>• Mentoring and evaluation of observer performance to ensure compliance with data collection standards.</li> </ul>	NA	NA	Trainers regularly participate into advanced “Training of Observers” courses across multiple regulatory areas (SPRFMO, CCAMLR)

**Table 5. Briefing and Debriefing**

Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
5.1 National observer programmes or service providers shall demonstrate that: there are systems for briefing and debriefing observers and communicating at any time with vessel captains.	<b>P</b>	D25 D51-D59 D71 D85–D89 D99	<p>The following evidence was submitted to demonstrate compliance with the requirement:</p> <ul style="list-style-type: none"> <li>• <i>Protocol for briefing and report review (D51)</i></li> <li>• <i>Observer pre-briefing meeting minutes</i>, signed by instructor and observer coordinator (D52–D54)</li> <li>• <i>2024 observer-trip assignment (D55)</i></li> <li>• <i>Observer trip report (D56)</i></li> <li>• <i>Academic Council meeting extracts (D57–D59, D85–D87)</i></li> <li>• <i>Training Section 2 (D25)</i></li> <li>• <i>Memorandum of Understanding and Cooperation in the Field of Scientific Observation on Fishing Vessels in the Southern Ocean Commission Regulatory Area 2024</i> (hereafter referred to as MoU) (D71)</li> <li>• Email confirmation of communication system (D89) and vessel contact list (D88)</li> </ul> <p>Evidence demonstrates a structured briefing system and systematic debriefing process. Signed minutes and stamped extracts confirm that briefings and debriefings are conducted and approved.</p> <p>While there is assurance of the ability to</p>	Introduce a documented Communication Standard Operating Procedure (SOP) into MoU (D71) specifying communication tools, logging procedures, and expected response times.	<p>The 2024 MoU (D71), was amended and now includes a section on SOP for Communications (Section 11), specifying communication tools, logging procedures and expected response times.</p> <p>The amended MoU (D99), will be used starting in 2026, thereby ensuring that the programme meets the requirement.</p>	NA

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Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
			communicate with vessel captains at any time, there is no formal, documented SOP specifying communication channels, logging procedures, or response-time expectations.			
5.2 The briefing and debriefing process: <ul style="list-style-type: none"><li>shall be conducted by properly trained personnel; and</li><li>shall ensure that observers and vessel captains clearly understand their respective roles and duties.</li></ul>	P	D49–D55 D57–D59 D71 D85–D87 D98 D99	<p>The following evidence was submitted to demonstrate compliance with standard 5.2.:</p> <ul style="list-style-type: none"> <li><i>Trainer CVs confirming qualifications (D49–D50)</i></li> <li><i>Signed/stamped briefing/debriefing records (D52–D54, D57–D59, D85–D87)</i></li> <li><i>Briefing protocol and checklists (D51, D55, D71)</i></li> <li><i>2024 MoU references vessel captains' rights and duties (D71, Articles 4–5, p.3)</i></li> </ul> <p>Evidence confirms that qualified staff conduct briefings and debriefings, and that observers receive clear instructions and acknowledgment. However, there is no direct evidence confirming that vessel captains clearly understand their roles and duties (e.g., signed acknowledgment or dedicated captain briefing record).</p>	<p>Include a captain-specific acknowledgment step in the 2024 MoU (D71) or create a signed briefing record for captains.</p>	<p>The 2024 MoU (D71) was amended to include a captain-specific acknowledgment step (D99, section 1, p.1.9). A template protocol for the briefing of the vessel's captain was also developed (D98). These documents will be used starting in 2026, thereby ensuring that the programme is fully aligned with the requirement.</p>	NA

**Table 6. Data Validation Process**

Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
<p>6.1 National observer programmes or service providers shall demonstrate that they have an observer data validation process in place.</p> <p>The data validation process:</p> <ul style="list-style-type: none"> <li>• shall be conducted by properly trained personnel; and</li> <li>• shall ensure that data and information collected by an observer are checked for discrepancies or inaccuracies that are corrected before the information is entered into a database or used for analysis.</li> </ul> <p>This includes ensuring that the national observer programme or service provider has in place a mechanism to receive data, reports and any other relevant information from an observer in such a way that prevents interference in that data from other sources.</p>	<b>P</b>	D50 D60-D66	<p>The following evidence was submitted to demonstrate compliance with the requirement:</p> <ul style="list-style-type: none"> <li>• <i>Suite of documents describing formal data regulation, validation workflow, and confidentiality procedures (D60–D64, D65–D66)</i></li> <li>• <i>CV of the person in charge of the data validation process (D50)</i></li> </ul> <p>The Programme has a structured data validation process including a four-stage workflow: automated checks, manual review, error-list compilation, and correction loop. Data is securely captured, transmitted, and stored, with mechanisms preventing interference from other sources.</p> <p>The data validation process is conducted by properly trained personnel (D50).</p> <p>This structured process ensures that all observer-collected data are accurate, internally consistent, and compliant with regulatory standards, providing a reliable foundation for fisheries monitoring and management.</p>	NA	NA	Four-stage observer data validation process that ensures that all observer-collected data are accurate, internally consistent, and compliant with regulatory standards.
6.2 The data validation process shall ensure that the data meet the standards laid out in Annex 3 of CMM-16-2025, detailed below.	<b>P</b>	D56 D65 D66 D90	<p>The following evidence was submitted to demonstrate compliance with the requirement:</p> <ul style="list-style-type: none"> <li>• <i>Observer trip report (D56)</i></li> <li>• <i>2024 copies of completed SPRFMO</i></li> </ul>	NA	NA	Consistent use of the most recent SPRFMO Excel templates ensures that observer-

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Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
	P	D92 D94 D95	<p><i>Excel trawl, transhipment templates (D94-D95)</i></p> <ul style="list-style-type: none"> <li>• <i>2020 SPRFMO Excel trawl, transhipment, landing templates (D65, D66, D92)</i></li> <li>• <i>CMM02-Observer-Trawl-template-Explanatory-May2018 (D90)</i></li> </ul> <p>The Programme workflow is robust. Copies of completed SPRFMO Excel templates were submitted, confirming compliance with Annex 3 standards. Details are provided below.</p>			collected data meet the standards outlined in Annex 3 of CMM-16-2025, or any subsequent updated version of the CMM.
a) A mechanism that allows scientific data to be stored and transferred to the national observer programme (or service provider) in a secure and confidential manner.	P	D60	<p>Evidence provided (D60 – data validation workflow) attest that scientific data are securely captured, encrypted, transmitted to a single password-protected coordinator workstation, and stored under institutional protection with a full audit trail.</p>	NA	NA	NA
b) Vessel information uniquely identifies the actual vessel from which the fishing occurred;	P	D56 D60 D61 D65 D90 D94	<p>Observer reports (D56) and copies of the completed SPRFMO Excel trawl templates and explanatory notes (D65, D90, D94), together with automated and manual cross-checks of data (D60), provide evidence that mandatory vessel identifiers are systematically verified against the SPRFMO vessel registry and relevant national ship registry lists.</p> <p>The established <i>information-protection regime</i> (D61) prohibits any unauthorized alteration of these identifiers, ensuring accuracy and eliminating ambiguity in vessel identification.</p>	NA	NA	NA

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Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
c) Dates and times of fishing effort are included and internally consistent (for example an end time should be after a start time);	<b>P</b>	D56 D60 D65 D94	<p>All required date- and time-fields are included in the <i>CMM 02/SPRFMO Excel trawl data-capture templates (D65)</i> used by the Observer Programme (<b>D56, D94</b>).</p> <p>The <i>four-stage validation process</i> described in <b>D60</b> combines automated and manual checks to ensure that:</p> <ul style="list-style-type: none"> <li>• Timestamps are in the correct UTC format;</li> <li>• Start times precede end times; and</li> <li>• Any inconsistencies are identified and corrected before data are uploaded to the central database.</li> </ul> <p>As a result, the validation process ensures that the dataset contains temporally accurate and internally consistent fishing-effort records.</p>	NA	NA	NA
d) Location of fishing is included and valid (for example, logical latitude/longitude combinations), internally consistent and entered in the correct units;	<b>P</b>	D56 D60 D65	<p>All required fishing-location data are captured in decimal degrees per CMM 02 using the <i>2020 SPRFMO Excel trawl template (D65)</i> as attested by <i>Observer trip report (D56)</i>.</p> <p>Coordinates are validated against geographic bounds and checked for consistency with tow duration and vessel area before entry into the national database (<b>D60</b>), ensuring data are accurate, consistent, and SPRFMO compliant.</p>	NA	NA	NA
e) Effort data allows quantification of the amount of effort invested by the vessel, appropriate to the fish-	<b>P</b>	D60 D65	Observers record fishing methods and effort parameters in standardized units per CMM 02/ using the <i>2020 SPRFMO Excel trawl template</i>	NA	NA	NA

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Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
ing method used, which is also identified;	<span style="background-color: #28a745; color: white; padding: 2px 5px;">P</span>		<p>(D65).</p> <p><i>Automated and manual validation (D60)</i> ensures consistency and gear-appropriateness, enabling reliable calculation of fishing effort by vessel and gear type.</p>			
f) Catch information identifies the fishery resource (to the species level where possible) and the quantity of that species retained or discarded. If used, species codes are accurate;	<span style="background-color: #28a745; color: white; padding: 2px 5px;">P</span>	D56 D60 D65	<p>Observers record species-level catch data, distinguishing retained and discarded quantities using CMM 02 species codes in the <i>2020 SPRFMO Excel trawl template (D65)</i>.</p> <p><i>Automated and manual validation (D60)</i> ensures consistency with total catch, with details also reported in <i>observer trip report (D56)</i>.</p>	NA	NA	NA
g) Where biological or length information is collected for a fish, it is directly linked to the effort in which it was caught – including date and time, location, and fishing method information, and includes the methodology of data collection;	<span style="background-color: #28a745; color: white; padding: 2px 5px;">P</span>	D56 D60 D65	<p>Biological and length measurements are recorded in the same templates as fishing effort, linked to each tow (date, time, coordinates, gear), following a documented sampling methodology (D65) verified by automated and manual checks (D60).</p> <p>Methodological details are also reported in <i>observer trip reports (D56)</i>.</p>	NA	NA	NA
h) If the observer programme extends to transhipment and/or landings, then the amount and species of fishery resources transhipped/landed is quantified and recorded according to a standard methodology;	<span style="background-color: #28a745; color: white; padding: 2px 5px;">P</span>	D56 D60 D66 D91-D93	<p>Observers record species-specific transhipment and landing data (D56) using the <i>2020 SPRFMO Excel templates (D66, D92)</i> and related guidance (D91, D93).</p> <p>As described in D60, observations cover the full fishing period, and retained catch totals are reconciled with unloaded and transhipped quantities, including fishmeal converted to live</p>	NA	NA	NA

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Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
			weight. Discrepancies are returned for correction, ensuring consistency with original catch records before database entry.			
i) Interaction data involving marine mammals, seabirds, reptiles and/or other species of concern identifies the individual species (where possible), the number of animals, fate (retained or released/discard), life status if released (vigorous, alive, lethargic, dead), and the type of interaction (hook/line entanglement/warpstrike/net	P	D56 D60 D65 D90	Observers record detailed interactions with marine mammals, seabirds, reptiles, and other species-of-concern ( <b>D56</b> ) using the 2020 <i>SPRFMO Excel template (D65)</i> and <i>related guidance (D90)</i> .  Automated checks flag missing or inconsistent information ( <b>D60</b> ), which is returned for correction, ensuring complete and accurate records in the national database.	NA	NA	NA

**Table 7. Observer Identification Cards**

Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
7.1 National observer programmes or service providers shall provide observers with identification cards that include the full name of the observer, date of issue and expiration, the name of the national observer programme or service provider, a unique identifying number (if issued by the national observer programme or service provider) a passport style photo of the observer, an emergency phone number.	<b>P</b>	D67-D69	<p>The following evidence was submitted to demonstrate compliance with the requirement:</p> <ul style="list-style-type: none"> <li>Copies of <i>observer identification cards</i> provided to deployed observers (<b>D67-D69</b>)</li> </ul> <p>The submitted identification cards include all required elements: full name, date of issue and expiration, programme name, unique identifying number, passport-style photograph, and emergency contact number.</p>	NA	NA	NA

**Table 8. Coordinating Observer Placements and Observer Deployments**

Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
8.1 National observer programmes or service providers shall demonstrate responsibility and capacity for the timely deployment of observers and will ensure that the selected observer receives all possible assistance during the entire length of their placements.	<b>P</b>	D3 D4 D55-D56 D70 D71	<p>The following evidence on observer deployment process and support was submitted to demonstrate compliance with the requirement:</p> <ul style="list-style-type: none"> <li>• <i>Contract agreements with fishing companies</i> for observer deployment (<b>D3–D4</b>)</li> <li>• <i>Observer Trip Assignment</i> (<b>D55</b>)</li> <li>• <i>Observer Report</i> (<b>D56</b>)</li> <li>• <i>Observer Deployment Orders</i> (<b>D70</b>)</li> <li>• <i>2024 MoU for the deployment of observers</i> (<b>D71</b>)</li> </ul> <p>The submitted documents confirm that national observer programme has the capacity and responsibility to deploy observers timely and that observers are provided with appropriate support throughout their placement.</p>	NA	NA	NA
8.2 National observer programmes or service providers shall have in place a protocol to replace an observer if the observer becomes unable to perform their duties.	<b>P</b>	D71	<p>Evidence on observer replacement procedure (<i>Article 10, 2024 MoU</i>) (<b>D71</b>) was submitted to demonstrate compliance with the requirement.</p> <p>Demonstrates that the Observer Programme has an operational and comprehensive protocol for replacing observers when necessary.</p>	NA	NA	NA
8.3 National observer programmes or service providers shall also seek, to the extent possible, to	<b>P</b>	D71	Evidence on observer deployment rotation ( <i>Article 1, point 1.7, 2024 MoU</i> ) ( <b>D71</b> ), was submitted to demonstrate compliance with the	NA	NA	Enforcement of a 90-day cumulative deployment

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Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
avoid deploying a single observer on multiple consecutive trips on the same vessel.	<span style="background-color: green; color: white; padding: 2px;">P</span>		<p>requirement.</p> <p>The MoU specifies measures to prevent consecutive deployments of the same observer on a single vessel and enforces a 90-day cumulative deployment ceiling.</p>			ceiling.
<p>8.4 It is the responsibility of a national observer programme or service provider to:</p> <ul style="list-style-type: none"> <li>• administer observer placements, to</li> <li>• maintain the independence and impartiality of observers as described in this measure and</li> <li>• ensure that all placements are administratively finalised as soon as practicable after the observers return to port.</li> </ul> <p>The national observer programme or service provider is expected to :</p> <ul style="list-style-type: none"> <li>• communicate with the observer regarding upcoming deployments,</li> <li>• coordinate observer travel, and</li> <li>• provide the necessary supplies</li> </ul>	<span style="background-color: green; color: white; padding: 2px;">P</span>	D3 D4 D25 D55 D56 D70 D71 D85-D87	<p>The following evidence on placement administration, observer support, and independence was submitted to demonstrate compliance with the requirement:</p> <ul style="list-style-type: none"> <li>◦ <i>Contract agreements with fishing companies for observer deployment (D3–D4);</i></li> <li>◦ <i>Observer Trip Assignment (D55);</i></li> <li>◦ <i>Observer Report (D56);</i></li> <li>◦ <i>Observer Deployment Orders (D70);</i></li> <li>◦ <i>2024 MoU (D71);</i></li> <li>◦ <i>Observer Debriefing Meeting Reports (D85–D87);</i></li> <li>◦ <i>Training Module “Section 02 Organisational Issues” (D25)</i></li> </ul> <p>The documentation confirms all six sub-requirements are fully met:</p> <ul style="list-style-type: none"> <li>• <b>Placement administration:</b> procedures defined in training, contracts, deployment orders, and trip assignments; observer listed on vessel</li> </ul>			

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Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
for observer duties.	Pass		<p>crew roster.</p> <ul style="list-style-type: none"> <li>• <b>Independence and impartiality:</b> ensured through Declarations of Integrity and MoU provisions; conflict-of-interest clauses in contracts.</li> <li>• <b>Prompt administrative finalisation:</b> debriefing reports and observer reports submitted promptly; contracts require reports within 30 working days.</li> <li>• <b>Communication of upcoming deployments:</b> observers informed via assignments and briefing meetings; deployment calendar shared with vessels.</li> <li>• <b>Travel coordination:</b> travel, visas, and permits arranged as per training module, deployment orders, and vessel contracts.</li> <li>• <b>Supply provision:</b> equipment and consumables provided according to training procedures, assignments, briefing meetings, and MoU obligations.</li> </ul>			

**Table 9. Observer Safety Equipment**

Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
9.1 National observer programmes or service providers must demonstrate that observers are provided with appropriate equipment, including safety equipment, which is in good working order, routinely checked and renewed to carry out their duties on board a vessel.  Essential equipment includes a lifejacket, independent two-way communication device capable of sending and receiving voice or text communications, personal locator beacons (PLBs), immersion suits, hard hat, proper deck working boots or shoes, gloves and protective glasses (including sunglasses).	<b>P</b>	D71  D89  D99	<p>Evidence confirming provision of essential safety equipment and its maintenance was submitted to demonstrate compliance with the requirement:</p> <ul style="list-style-type: none"> <li>• <i>MoU Deployment Observers 2024</i>, clauses 6 and 6.14 (<b>D71</b>);</li> <li>• Russian Maritime Register safety certification requirements.</li> </ul> <p>The 2024 MoU (<b>D71</b>) confirms that observers are provided by the fishing vessels with all essential safety equipment: life jackets, ISO-compliant immersion suits, portable satellite communication devices, personal locator beacons, EN397-standard helmets, steel-toe deck boots, protective gloves, and climate-appropriate clothing including protective glasses. AtlantNIRO confirmed by email that safety equipment provided by fishing vessels is subject to regular inspection and certification in line with Russian Maritime Register requirements (<b>D89</b>).</p> <p>The documents demonstrate both provision and maintenance of equipment. Nevertheless, the Observer Programme should independently ensure that items are functional and up to date.</p>	<p>Update the 2024 MoU (<b>D71</b>) to formalize the onboard verification of equipment functionality and renewal.</p> <p>Observers should be required to inspect all safety and operational equipment prior to deployment and to review inspection records, ensuring that every item is fully functional and up to date before use at sea.</p>	<p><i>Section 6 (Observer Safety) of the 2024 MoU (<b>D71</b>) has been supplemented with a provision on equipment inspection by the observer (p.6.14).</i></p> <p>The amended version of the document (<b>D99</b>) will be used starting in 2026, thereby ensuring the programme is fully aligned with the requirement.</p>	NA

**Table 10. Responding to Allegations of Observer Misconduct**

Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
10.1 National observer programmes or service providers must establish procedures for preventing, investigating, and reporting on the misconduct of observers, in coordination with observers, vessel captains, and relevant Members and CNCPs.	P	D72	The <i>Code of Discipline and Ethics for Scientific Observers</i> (D72) was submitted as evidence of compliance with the requirement. The Code outlines ethical obligations, violation classification, incident-reporting procedures, disciplinary measures, and appeal rights. It explicitly involves coordination with the observer, vessel captain, and relevant national authority. All aspects of prevention, investigation, and reporting are comprehensively covered and properly structured.	NA	NA	NA

**Table 11. Dispute Settlement**

Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
11.1 National observer programmes or service providers shall demonstrate the existence of a dispute resolution process fair to all parties that provides a process to resolve issues through appropriate means including facilitation and mediation.	<b>P</b>	D3 D4 D72 D97	<p>Documentation on dispute resolution procedures was submitted as evidence of compliance with the requirement:</p> <ul style="list-style-type: none"> <li>• <i>Code of Discipline and Ethics for Scientific Observers (D72)</i>, Appendix C (p. 7)</li> <li>• <i>Contract agreements with fishing companies</i> for observer deployment (<b>D3–D4</b>)</li> </ul> <p>The Code provides a comprehensive dispute-resolution mechanism covering registration, investigation, decision-making, appeal, and confidentiality. However, it does not explicitly include facilitation or mediation mechanisms.</p> <p>The dispute resolution and complaints procedure is also outlined in Section 5, "Responsibilities of the Parties", of the Agreements between the scientific institute and the fishing organization.</p> <p>No independent facilitators, joint workshops, or alternative dispute resolution steps are referenced; the process is formal and adjudicative rather than offering structured mediation or facilitation options.</p>	Incorporate explicit mediation or facilitation procedures to the <i>Code of Discipline and Ethics for Scientific Observers (D72)</i> .	Appendix C – <i>"Procedure for Resolving Disputes and Considering Complaints Regarding the Actions of Scientific Observers"</i> of the <i>Code of Discipline and Ethics for Scientific Observers (D72)</i> was amended. The additions include a full set of provisions for mediation mechanisms. The revised document ( <b>D97</b> ) will be used starting in 2026, thereby ensuring programme full alignment with the requirement.	NA

**Table 12. Observer safety**

Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
12.1 National programmes or service providers must demonstrate that procedures are in place to: support observers in their ability to carry out their duties unimpeded and in a safe working environment, including an established Emergency Action Plan (EAP). The EAP must provide instructions on sending reports to the provider's designated 24-hour point(s) of contact to report unsafe conditions, including instances of harassment, intimidation or assault.	<b>P</b>	D3 D4 D55 D67–D69 D71 D72 D100	<p>Procedures to support observer duties; emergency contact protocols was submitted as evidence of compliance with the requirement:</p> <ul style="list-style-type: none"> <li>• <i>Contract agreements with fishing companies for observer deployment (D3–D4)</i></li> <li>• <i>MoU 2024 (D71)</i></li> <li>• <i>2024 Code of Discipline and Ethics for Scientific observers (D72)</i>, Appendix B (p. 5)</li> <li>• <i>Trip Assignment 2024 (D55)</i></li> <li>• <i>Observer ID cards 2024 (D67–D69)</i></li> </ul> <p>Section “3. Obligations of the Parties” of the <i>contract agreements with fishing companies for observer deployment (D3–D4)</i> outlines captain and vessel operator responsibilities for observer safety. These include ensuring safe working conditions, medical care, and the Observer’s dignity under international maritime law; procedures for at-sea transfers; mandatory safety briefings; the Observer’s right to refuse boarding for safety reasons; and the ability to report safety concerns at any time to the captain, programme coordinator, SPRFMO Secretariat, or flag State.</p> <p>Sections 2, 3, 5, and 6 of the 2024 MoU (D71) cover observer rights, duties, ship operator</p>	<p>Develop a formal <i>Emergency Action Plan (EAP)</i> that includes:</p> <ul style="list-style-type: none"> <li>- Clear communication protocols with designated personnel for 24-hour observer contact.</li> <li>- Follow-up procedures to ensure timely communication with the observer, vessel, and authorities.</li> <li>- Remedial and emergency measures to address safety concerns.</li> <li>- Legally or nationally recognized procedures for incidents of</li> </ul>	<p>A formal <i>Emergency Action Plan (D100)</i> for harassment, intimidation, or assault was developed by AtlantNIRO.</p> <p>The EAP includes:</p> <ul style="list-style-type: none"> <li>- Clear communication protocols with designated 24-hour observer contacts</li> <li>- Follow-up procedures to ensure timely communication with the observer, vessel, and authorities</li> <li>- Remedial and emergency measures to address safety concerns</li> <li>- Remedial and emergency measures to address safety concerns</li> </ul>	NA

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Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
	P		<p>responsibilities, and safety. Section 7 addresses at-sea emergencies.</p> <p><i>“Appendix B: Incident Reporting Procedure”</i> of the <i>2024 Code of Discipline and Ethics for Scientific observers (D72)</i>, establishes a uniform procedure for Observers to report serious conflicts or threats from crew, safety incidents or emergencies, threats to personal safety, critical equipment failures, and serious health issues.</p> <p>The emergency contact information is provided in <i>Trip Assignment 2024 (D55)</i> and <i>observer ID cards (D67–D69)</i>.</p> <p>However, none of the documents provide a formal Emergency Action Plan (EAP) for reporting unsafe conditions such as harassment, intimidation, or assault.</p>	interference, harassment, or intimidation	<ul style="list-style-type: none"> <li>- Legally or nationally recognized procedures for incidents of interference, harassment, or intimidation</li> </ul> <p>The document will be implemented in 2026, thereby ensuring programme full alignment with the requirement.</p>	
12.2 National observer programmes or service providers must also provide a permanent delegate or supervisor on land to communicate with the observer at any time while at sea.	P	D3 D4 D55 D67–D69 D71 D89	<p>The following evidence was submitted to demonstrate compliance with the requirement:</p> <ul style="list-style-type: none"> <li>• <i>Contract agreements with fishing companies for observer deployment (D3–D4)</i></li> <li>• <i>MoU 2024 (D71)</i>;</li> <li>• <i>Observer Trip Assignment 2024 (D55)</i>;</li> <li>• <i>Observer ID cards 2024 (D67–D69)</i></li> <li>• <i>Email AtlantNIRO FSBSI VNIRO_ST5_ST9_ST12_22Oct_2025 (D89)</i></li> </ul> <p>The <i>Contract agreements with fishing</i></p>	NA	NA	NA

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Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
	Pass		<p><i>companies for observer deployment (D3–D4, p. 3.2.5), states that the “observer is assigned a curator from the Contractor (Gerber Efim Matveevich, e-mail: gerber@atlant.vniro.ru, mobile phone: +7-4012-925-583) for contact with any questions implementation of the observation program”.</i></p> <p>The 2024 MoU (D71) p. 2.11 explicitly states that the Observer has the right to “<i>A designated contact or supervisor on land for communication at all times at sea;</i>” but does not state who or provide contact details.</p> <p>Trip assignment forms and ID cards provide an emergency direct contact detail to ensure continuous communication with deployed observers.</p> <p>Clarification regarding the “<i>designated contact or supervisor on land</i>” was requested from AtlantNIRO, which subsequently provided the name and contact details by email (D89).</p>			

**Table 13. Insurance and Liability**

Requirement	Pass/ Fail	Supporting Documents	Findings & Analysis	Recommendation	Follow-up Actions	Good Practices
13.1 National observer programmes or service providers must demonstrate that observers have health, safety and liability insurance commensurate with the national standards of the observer programme or service provider for such insurance for the duration of any deployment before placing the observer on a vessel.	P	D73–D75	The <i>insurance documents</i> provided (D73–D75) demonstrate that observers have health, safety, and liability coverage, confirming that the national observer programme fully complies with the requirement.	NA	NA	NA