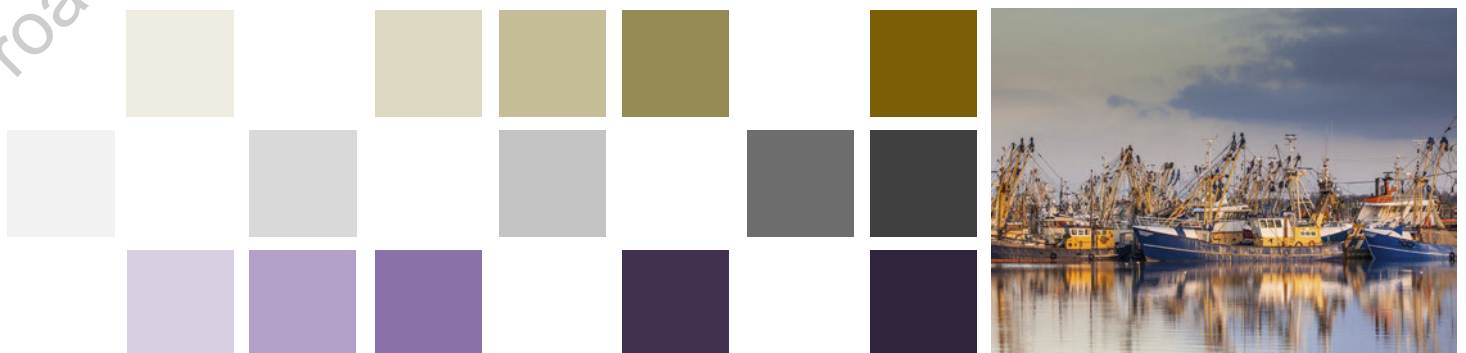


Pacific Islands Forum Fisheries Agency Mid-Term Reviews: Review Report

South Pacific Tuna Longline Policy and Management, Pacific Islands Port State Measures, and the Catch Documentation and Enhancing Compliance in Pacific Tuna Fisheries

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Contents

Acknowledgements	i
Glossary	iv
Executive summary	viii
Background	viii
Key findings.....	ix
There are many complex factors affecting progress	xi
Recommended next steps to consider.....	xv
PIPSM and CDEC.....	xvii
CDEC	xvii
SPLL.....	xviii
Financial considerations.....	xx
1. Introduction.....	1
1.2 Background context.....	7
2. Pacific Islands Port State Measures.....	9
2.1 Background context.....	9
2.2 Key findings.....	10
2.3 What progress is being made?.....	11
2.4 External factors to FFA impacting on progress being made	15
2.5 Internal factors to FFA impacting on progress being made.....	16
2.6 Managing, implementing, and governing the PIPSM	18
2.7 How cost-effective is the approach employed to deliver results?	21
2.8 Options for improving implementation of the PIPSM	22
3. Catch Document and Enhancing Compliance	25
3.1 Background context.....	25
3.2 Key findings.....	27
3.3 What progress is being made?.....	30
3.4 External factors influencing progress.....	37
3.5 Internal factors impacting on progress.....	40
3.6 Managing, implementing, and governing	42
3.7 How cost-effective is the approach employed to deliver results?	44
3.8 Options for improving implementation of the CDEC.....	46
4. South Pacific Longline Policy and Management	51
4.1 Background context.....	51
4.2 Key findings.....	55

4.3	What progress is being made?.....	57
4.4	External factors to FFA impacting on progress.....	59
4.5	Internal factors to FFA impacting on progress	61
4.6	How cost effective is the approach employed to deliver results?.....	66
4.7	Options for improving implementation of the SPL.....	66
5.	Conclusions.....	70
5.1	Summary	70
5.2	Recommendations.....	74
5.3	Financial considerations.....	78
	Bibliography and reference material	80
	About Sapere	97
 Appendices		
Appendix A	People and organisations consulted.....	82
Appendix B	Review of Activity Finances.....	83
Appendix C	Evaluation Framework.....	91
Appendix D	Governance, Quality and Ethics.....	96

Glossary

Abbreviation	Stands For
ADD	Activity Design Document
AI	Artificial intelligence
ANCORS	Australian National Centre for Ocean Resources and Security
APR	Annual Progress Report
CAM	Catch accounting module
CDEC	Catch Documentation and Enhancing Compliance in Pacific Tuna Fisheries Activity
CDSA	CDS Technical Adviser under the CDEC Activity
CDS	Catch Documentation Scheme
CDS-IWG	WCPFC CDS Intersessional working group
CCM	WCPFC Member, Cooperating Non-member, and Participating Territory
CMA/CMS	Catch Management Arrangement/Catch Management Scheme
CMM	WCPFC Conservation and Management Measure
CPUE	Catch Per Unit Effort
CVT	Catch Visualisation Tool
CA	Competent Authority
DCC	Tuna Data Collection Committee
DAC	OECD's DAC Network on Development Cooperation (EvalNet)
DBIT	Dockside boarding and inspection training
DSBI	Dockside boarding and inspection
DWFNs	Distance Water Fishing Nations
EPO	Eastern Pacific Ocean
e-CDS	Electronic Catch Documentation Scheme
EEZ	Exclusive Economic Zone
EM	Electronic monitoring
ER	Electronic reporting
FAO	United Nations Food and Agriculture Organisation
FAD	Fish Aggregating Device

FFA	Pacific Islands Forum Fisheries Agency
FFC	Pacific Islands Forum Fisheries Agency Committee
FSM	Federated States of Micronesia
FIMS	Fisheries Information Management System
FMA	Fisheries Management Adviser (FFA Secretariat)
FFC	Forum Fisheries Committee
GEF	Global Environment Facility
GFA	Grant Funding Agreement
HCR	Harvest Control Rules
HMS	Highly Migratory Fish Stocks
iFIMS	Integrated Fisheries Information Management System (PNA)
IMS	Information Management System
IT	Information Technology
IWG	Inter-sessional working group
IUU	Illegal, Unreported, and Unregulated fishing
LoA	Letter of Agreement
LLVDS	The PNA's Longline Vessel Day Scheme
MCS	Monitoring, Control and Surveillance
M&E	Monitoring and Evaluation
MCSWG	FFA's Monitoring, Control and Surveillance Working Group
MSC	Marine Stewardship Council
MFAT	Ministry of Foreign Affairs and Trade, New Zealand
MPI	Ministry of Primary Industries, New Zealand
MTR	Mid Term Review
NGO	Non-governmental organisation
NTSA	Niue Treaty Subsidiary Agreement
OFMP	Oceanic Fisheries Management Project financed by GEF implemented by FFA
OFF	Oceanic Fisheries Programme (SPC)
OECD	Organisation for Economic Cooperation and Development

DAC EvalNet	OECD's Development Assistance Committee's (DAC) Network on Development Evaluation (EvalNet)
PAE	Party Allowable Effort
PIC/T	Pacific Island Country/Territory
PIF	Pacific Islands Forum
PEW	PEW Charitable Trust
PEUMP	Pacific EU Maritime Programme
PIPSM	Pacific Islands Port State Measures Activity
PNA	Parties to the Nauru Agreement
PNG	Papua New Guinea
PNAO	Office of the PNA
PSMA	The FAO Port State Measurement Agreement
PSM	Port State Measures
QR	Quick Response Code
RCDECW	Regional CDEC Workshop
RCDSF	Regional CDS Framework
RFMO	Regional Fisheries Management Organisation
RIMF	Regional Information Management Facility (FFA)
RLLS	Regional Longline Strategy
RPSMF	Regional PSM Framework
RPMW	Regional Port Monitoring Workshop
RMI	Republic of Marshall Islands
RMT	Activity Design Document's Results Management Table
WCPFC-CA	WCPFC Convention Area
WCPFC-CMS	WCPFC Compliance Monitoring Scheme
WCPFC SC	WCPFC Scientific Committee
SIDS	Small Island Developing State
SBF	Spawning Biomass at a level of Fishing Mortality
SC	Activity Steering Committee
SPA	South Pacific Albacore

SPC	Secretariat of the Pacific Community (Oceanic Fisheries Programme)
SPG	South Pacific Group
SPLL	South Pacific Longline Policy and Management Activity
SOP	Standard Operating Procedure
SRF	MFAT's Strategic Results Framework
SDG	Sustainable Development Goals
TAE	Total Allowable Effort
TRP	Target Reference Point
TA	Technical Adviser
TCC	WCPFC Technical and Compliance Committee
TKA	Tokelau Arrangement for the Management of the South Pacific Albacore Fishery
TNC	The Nature Conservancy
TUFMAN	Tuna Fisheries Data Management System (SPC)
TVM	Te Vaka Moana Arrangement
TWG	The FFA Secretariat PIPSM and CDEC Technical Working Group
UFE	Utilisation-focused evaluation
VDS	Vessel Day Scheme
VMS	Vessel Monitoring System
WCPFC	Western and Central Pacific Fisheries Commission
WCPFC-CA	WCPFC- Convention Area
WCPO	Western and Central Pacific Ocean

Executive summary

Background

Between August and December 2021, three Mid Term Reviews (MTRs) were undertaken for three Activities financed by the New Zealand Ministry of Foreign Affairs and Trade (MFAT) and implemented by the Pacific Islands Forum Fisheries Agency (FFA). The Activities were:

- Pacific Islands Port State Measures (PIPSM)
- Catch Documentation and Enhancing Compliance in Pacific Tuna Fisheries (CDEC), and
- Improving South Pacific Longline Policy and Management (SPLL).

The PIPSM commenced in January 2017 and is scheduled for completion in May 2022. MFAT is providing funding of NZ\$2,661,963 for this Activity. The CDEC commenced in July 2018 and has a scheduled completion date of October 2023. MFAT is providing funding of NZ\$4,929,968 to support the Activity. The SPLL commenced in February 2017 and is scheduled to run until February 2022. MFAT is providing funding of NZ\$7,095,665 to support the SPLL Activity.

Overall goal

The overall goal of MFAT's investment priorities for fisheries at the time the Activity Design Documents (ADDs) were formulated in 2016 was "increased economic and food security benefits from sustainable fisheries in the Pacific". This was carried forward in MFAT's 2020-2024 *Strategic Intentions* that, *inter alia*, included the reduction and elimination of illegal, unreported, and unregulated (IUU) fishing.

PIPSM, CDEC and SPLLs' goals

The goal of the PIPSM is "reduced IUU fishing in the Pacific through cooperative monitoring, control and surveillance (MCS) programmes". This goal was supported by four Outputs, each comprising several sub-outputs or tasks.

The goal of the CDEC Activity is "a functioning Catch Documentation Scheme (CDS) building on improved Pacific MCS programmes, delivering increased traceability of Pacific caught tuna, maintaining, and enhancing market access, and ensuring that IUU fishing-related product is not entering the system". The goal is supported by four outputs and associated sub-outputs and tasks.

The goal of the SPLL Activity specified in the ADD is "increased economic and food security benefits from a sustainable South Pacific albacore fishery". The Activity included five Outputs, each comprising subsidiary outputs or tasks.

Activity management and governance

The Secretariat of the Pacific Community (SPC) is an implementing partner contracted by FFA to provide technical support to the SPLL and CDEC Activities.

As governance and administrative arrangements described in the ADD for these Activities are subject to the management and administrative processes and systems that apply to the FFA Secretariat, the MTR examined the effectiveness and efficiency of these systems and processes in the context of the

implementation of the three Activities. The Terms of Reference for the MTR did not extend to a detailed review of the FFA Secretariat's corporate processes. This MTR's commentary on FFA's corporate systems and processes is concerned with the three MFAT-supported Activities only.

Key findings

All three Activities were relevant, fit for purpose and cost-effective

All three Activities, the PIPSM, the CDEC and the SPLL, were relevant at the time the ADDs were prepared and are still relevant today. Key policy documents to support this include:

- At the time the three ADDs were drafted in 2016, FFA's 2005-2020 Strategic Plan made no reference to port state measures (PSM), catch document schemes, albacore, or longline fisheries. It did provide, however, for significant attention to the development and implementation of appropriate fisheries management arrangements that would apply to South Pacific Albacore (SPA).
- FFA's Strategic Plan 2020-2025 highlights the importance of support for zone-based fisheries management. It also references support for the development of CDS, and although there is no mention of PSM, efforts to combat IUU fishing through strengthened MCS initiatives are underscored.
- FFA's 2018-2023 Regional MCS Strategy includes provisions for supporting CDS and PSM initiatives of FFA members.

On this basis, the three Activities address national and regional priorities identified and agreed by FFA members. These are aligned with the FFA Secretariat's Strategic Plan. The strengthening of management arrangements for SPA also has been a significant issue for FFA members for almost three decades.

The Activities' designs overall were fit for purpose when created. All three ADDs provided a solid platform to make progress towards their respective short-, medium- and long-term outcomes and were based on FFA's extensive experience with the implementation of large complex Activities, which was a reasonable assumption.

This approach for all three Activities has been tested and proven. FFA, as an agency, has extensive experience implementing large, complex, multi-disciplinary regional initiatives for its members funded through a range of partners. This approach takes advantage of FFA's significant corporate knowledge, experience, established country relationships supported by existing institutional arrangements, and a deep understanding of Western and Central Pacific Ocean (WCPO) fisheries. In this respect, the designs were cost-effective.

Progress across all three Activities has been limited

All three Activities have made progress. However, the progress made towards achieving the anticipated outcomes for the three Activities has been limited.

PIPSM's progress to date

In its almost four years of implementation, the primary achievement for PIPSM was the adoption of the Regional PSM Framework (RPSMF) in 2020. This was the result of the work involving several consultancies that provided foundational material and numerous workshops and meetings across 2018-2020. This work also contributed to a baseline appraisal of national PSM arrangements, market State requirements (which is more relevant to CDEC), draft IUU risk assessment criteria, e-PSM tool development and some preliminary support at the national level for nine FFA PIC members.

CDEC's progress to date

For the CDEC, some progress has been made in relation to the short- and medium-term Outcomes, with the adoption of the Regional CDS Framework (RCDSF) in 2021. Apart from the RCDSF (and a series of consultancies, which have served as background material for both the PIPSM and the CDEC) there has been little progress with implementation of the CDEC Activity. This has been compounded by the pandemic, which has meant critical in-country supporting work associated with the PIPSM and the CDEC has not been possible except for Papua New Guinea (PNG), where the CDS Technical Adviser is currently based.

The RPSMF and RCDSF frameworks, however, are not supported by an implementation plan

Similar to PSM, some FFA members (PNG, Fiji, Solomon Islands, Kiribati, and the Republic of the Marshall Islands (RMI)) have made progress with the development and implementation of national CDS. However, based on the evidence available to the MTR, there is no consistent application by PICs' fisheries administrations, and synergies and harmonisation remain underdeveloped.

The two Regional Frameworks are notable achievements providing high-level guidelines for subsequent regional and/or national actions to operationalise them. The extent that either of them are used in this endeavour, either nationally or regionally, is currently implicit. Other than for the purpose of annual work plans prepared for internal FFA Secretariat purposes, and reporting to MFAT, there is no supporting implementation strategy or action plan associated with either Framework.

Implementing the two Activities concurrently has presented some challenges

The FFA Secretariat initially proposed implementing the PIPSM Activity first and using that as a foundation for CDS work that would follow under the CDEC Activity. In hindsight, this is what should have occurred rather than to attempt implementation of both at the same time. Some stakeholders considered that the region was inadequately prepared for the implementation of two large Activities aimed at developing and supporting the implementation of CDS and PSM simultaneously. Rather than embarking on fully fledged Activities that envisaged the full operationalisation of regional systems at the conclusion of the intervention, it was suggested that a preparatory two- or three-year Activity would have clarified needs and laid the foundation for an intervention that had improved prospects of acceptance and success.

SPLL's progress to date

The SPLL Activity was significantly impacted by the decision of the members of the Tokelau Agreement (TKA) to postpone further consideration of the development of a Catch Management Arrangement (CMA) in 2017. The SPLL Activity logic has not been substantively revised to reflect this decision which had significant implications for the SPLL.

In relation to Outputs 1 and 3 of the SPLL, SPC has provided substantive technical information and advice to FFA members to the status of the South Pacific albacore resources, the fisheries that harvest South Pacific albacore, and biological and economic issues associated with the assessment of options for high-seas and zone-based management. SPC has also started the development of a catch visualisation tool that supports what-if scenario analysis for national level application to assist countries to understand options for the management of their domestic fisheries in near real time in the absence of limits agreed at the regional level.

Progress has also been made in relation to Output 4 through integrating electronic reporting (ER) to national and regional information management systems (IMS) through the *On-board* and *On-shore* applications and enhancement of the Tuna Fisheries Data Management System (TUFMAN2).

The FFA has also been pro-active in exploring options for FFA members' consideration of zone-based management arrangements as a priority before pushing for compatible limits on the high seas in the Western and Central Pacific Fisheries Commission (WCPFC) by producing numerous analyses in an effort to motivate a critical mass of TKA members to agree to collective action. This effort is on-going with, for FFA members and the Secretariat alike, frustratingly little apparent progress.

The 2021 report produced by ANCORS is the most recent attempt to re-invigorate regional engagement on options for zone base management by the FFA to help its members develop a positive direction forward and to overcome the hesitancy of members to agree to a process that may have adverse national implications. While this situation persists, the economic outlook for FFA PIC member engagement in regional SPA longline fisheries will remain stalled, and at worse, deteriorate.

There are many complex factors affecting progress

External factors to FFA impacting on progress

Progress has been impacted by several factors external to FFA including (i) the pandemic, (ii) regional issues, and (iii) capacity issues relating to national fishery administrations.

COVID-19 has had significant implications

Delivering Activities, as they were designed, depends on the capacity to bring FFA members together in regional meetings and workshops to strategize, discuss policy, and agree to future action. There is also a significant reliance on the ability to travel to support in-country work associated with national management systems, legal and policy reviews, and capacity building initiatives.

COVID-19 had significant implications for this delivery model. Back-to back virtual meetings associated with the pandemic have placed unsustainable demands on small FFA PIC member fisheries administrations. Substantive discussions that occur in face-to face meetings, and more importantly in

the corridor and social settings that are traditionally associated with meetings among Pacific Islands delegations, have not been possible for almost two years, and this is likely to remain the case for the foreseeable future.

Potential risks associated with regional strategizing and coordination were identified in each Activity's ADD. These risks had a much greater collective impact upon Activity implementation, and progress made, than was probably anticipated at the time the ADDs were designed.

Regional factors impacted on Activity delivery

Although COVID-19 is often cited as a reason for delayed implementation of the three Activities, legacy issues associated with the 2015 Pacific Islands Forum (PIF) announcements still do not sit well with some FFA members, notably some Parties to the Nauru Agreement (PNA) members. New Zealand's high-profile political efforts to persuade the PNA to discard its Vessel Day Scheme (VDS) and instead adopt a CMA were reported to have adversely impacted on their early engagement by some FFA PIC members in the three Activities subject to the MTR.

Other Regional factors have also impacted the delivery of CDEC. Several FFA members were advancing the development of national CDS prior to the CDEC starting, and the Office of the Parties to the Nauru Agreement (PNAO) has also developed a CDS module for the PNA Fisheries Information Management System (FIMS). PNG is reported to support a relatively advanced CDS module for its FIMS, and SPC continues to enhance TUFMAN2 to provide CDS-related services if needed in the future. This, and the apparent lack of a shared understanding of the structure of CDS in the region, a centralised regional CDS or relatively independent national CDS systems, potentially has significant implications for regional harmonisation of standards and inter-operability.

Regarding the PIPSM, the United Nations Food and Agriculture Organisation (FAO) Port State Measures Agreement (PSMA), coming into force in 2016, which led to increased requests for legal assistance, policy reviews, assessments related to PSMA ratification, national PSM gaps assessments and capacity building, had implications for the roll-out of the proposed PIPSM initiatives.

Limited capacity of some national fishery administrations

In addition, some national fishery administrations emphasised their limited engagement was a reflection on the resources available to simultaneously service all the issues on the politically and technically complex regional fisheries agenda. They advised that their apparent low-level participation was a consequence of them being forced to be selective regarding the matters they engage in due to limited national capacity.

Internal factors to FFA impacting on the delivery of the Activities

The MTR identified several internal factors to FFA that have hindered progress. These included: capacity challenges within the FFA Secretariat; inadequate strategic oversight and leadership by the FFA senior executive team and FFA members; poor coordination and collaboration between FFA Divisions; limited involvement of the FFC; both the Steering Committee and the Technical Working Group not fulfilling their respective potential; significant concerns with the FFA Information Management Services; and meeting and Activity administrative practice that needs strengthening.

Capacity challenges within the FFA Secretariat

There was an almost unanimous view that, over last three or four years, there has been a substantial loss of capacity within the FFA Secretariat. Key stakeholders consider that the Agency is under-resourced in terms of what is required to service the complex policy and technical issues that are on the regional fisheries agenda.

The period since the commencement of the three Activities witnessed a significant movement of staff, many of whom had important roles in the implementation of the PIPSM, CDEC and SPLL. With no respite in terms of the enormous workload expected of the Secretariat, the departures have had significant implications for the Secretariat's performance.

Like the FFA, the SPC Oceanic Fisheries Programme (OFP) also experienced several senior staff changes in the time that the MFAT Activities have been under implementation. These changes appear to have had minimal impact on the implementation of the CDEC and SPLL activities. This is possibly because SPC was largely responsible for charting its own programme of work and both the CDEC and SPLL were relatively easy to integrate to SPC's on-going services and initiatives for FFA members.

In relation to the capacity of the FFA Secretariat and the implications for the three MFAT-supported Activities, the MTR was presented with a range of views in relation to the role of the FFA Secretariat. It was noted that, since its establishment, the Secretariat has successfully served in a dual role.

The first is providing the best available technical and policy advice to FFA members. The second is to support strengthening of member national fisheries administrations. At present some key FFA national fisheries administration stakeholders are of the view that the role of providing the best possible technical and policy advice is under-performing.

Limited executive leadership and management oversight

There has been limited executive leadership and managerial oversight for the Activity Managers and Technical Adviser that have the current responsibility for delivering the three Activities. This has been further weakened by not having the necessary technical and policy support to call on from within the Secretariat to effectively implement the Activities.

Poor internal coordination and collaboration

Several stakeholders also reported poor internal coordination and collaboration among key groups within the Secretariat, and poor working relationship/s with IT services, which has consequently impacted on the progress made particularly for the PIPSM and CDEC Activities.

Within the Secretariat the three Activities sit within the Fisheries Management Division. While the strong linkages to the Fisheries Operations Division are apparently widely acknowledged within the Secretariat, particularly in relation to the CDEC and PIPSM, positive working relationships for implementation benefit have not materialised.

Early during Activity implementation, FFA staff involved in the implementation of the Pacific EU Maritime Programme (PEUMP), the second Global Environment Facility Oceanic Fisheries Management Project (GEF OFMPII) and the PIPSM met with technical staff representing different Secretariat Divisions under the auspices of a Technical Working Group (TWG). The purpose of the TWG was to discuss opportunities to develop synergies and avoid potential overlap of several initiatives that

provided similar types of support to FFA members as offered through the MFAT-supported Activities. This was most prevalent in respect of the PIPSM Activity.

Although informal discussion between Activity staff may have continued, the TWG only appears to have met on five occasions during 2018 and 2019. The reasons for the discontinuation of the TWG meetings are uncertain but could relate to turnover among key Activity staff, and/or lack of strategic vision and oversight from management, and/or personality conflicts. Poor internal coordination appears to be a feature of the three MFAT-Activities, and a forum such as provided by the TWG, on face value, should offer a useful means to promote coordination and synergies and avoid conflict. The MTR recommends it be re-established.

Limited involvement of the FFC

There is limited evidence that the Forum Fisheries Committee (FFC) has been provided with the opportunity to assume a primary role in the governance of the three MFAT-funded Activities as envisaged in the respective ADDs. Periodic updating may have been provided to FFC as part of routine annual reporting provided by the Secretariat. FFC certainly considered initiatives that had received support from the Activity, such as the Regional Frameworks, but the governance responsibility envisaged in the ADD was essentially delegated to the Steering Committee (SC).

The Steering Committee did not fulfil its potential

The Steering Committee (SC) is not currently performing the oversight role envisaged in the ADDs for the three Activities. There is little evidence that the SC has been effective in terms of either providing strategic guidance or in terms of monitoring Activity progress against output delivery. Although it may be subject to periodic discussions between FFA and MFAT staff, there is limited indication that the Annual Progress Reports (APR) or the Results Management Tables (RMT) are used proactively by the SC to monitor activities. RMT entries are often repetitive and mostly record an event with limited indication of issues raised or outputs achieved. This reflects poorly on monitoring and evaluation (M&E) systems in place for the three Activities.

FFA's Information Management Services has hampered progress

IT services, and the relationship to the three MFAT-supported Activities in the FFA Secretariat, arguably attracted the most passionate and the most critical engagement from stakeholders. Both internal and external stakeholders said there was a lack of vision and transparency regarding IT's services internally, and limited evidence of a willingness to embrace innovation. And that services, systems, and processes do not keep pace with technological developments in the sector, and there is a reliance on putting limited Secretariat resources into bespoke projects when industry-tested commercial services are readily available.

In addition, there is limited clarity in relation to the two primary areas of support required of FFA's IT services. The MTR is of the view that the current situation, where the Fisheries Operations Division is responsible for both externally-facing operational IT-related services to members and the Secretariat's internal corporate IT systems, urgently requires review. Externally, FFA member officials also cited numerous examples of engagement with FFA's IT services that reflect poorly on the professional reputation of the Agency.

Meeting and Activity management practice needs strengthening

Although the MTR had limited opportunity to observe project-related meetings, there is evidence to suggest that meeting management requires strengthening. This relates to (i) the availability of meeting documents sufficiently in advance of meetings to enable delegations to thoroughly review documentation and undertake consultations relevant to the issues to be addressed, and (ii) the preparation, quality of content and distribution of meeting reports.

Document management also generally requires improvement. This relates to ensuring project-related documentation is dated, responsible officers are identified, version control is implemented and that there is a systematic process for the archiving and distribution of final versions.

Gender considerations need attention

Although the situation is reported to have improved recently, the MTR was alerted to challenges some female staff experience working in the male-dominated environment of the FFA Secretariat and regional fisheries networks. The MTR was advised that the FFA Secretariat is in the process of recruiting a gender specialist. Once recruited, there will be an immediate need for the appointee to engage with the three MFAT Activities.

Gender disaggregated reporting is poor for all three Activities. It is recommended that Activity management strengthens reporting systems to capture gender disaggregated information for the remaining period of implementation of the three Activities.

Recommended next steps to consider

The next section summarises key opportunities to improve the progress being made by all three Activities.

Strengthen senior strategic leadership, management, and engagement

The Activities require increased strategic oversight, engagement and active management by the senior leadership and management team in the FFA Secretariat. This will improve the identification of priorities and the marshalling and coordination of resources appropriate to address the needs for each Activity. This will lead to more cost-effective implementation and increased regional and national benefits flowing from these significant funding opportunities which have limited timeframes.

Boost the technical and policy support

Staff with professional MCS experience, particularly with experience in PSM and CDS and multilateral fisheries management, need to be assigned to these Activities to provide support to the Activity Manager and the CDS Technical Adviser. Such expertise could be sourced by dedicating additional Fisheries Management Adviser (FMA) resources to the Activity. If that expertise is not available in FFA, then external expertise should be secured under contract. Technical and policy capacity and capability to support the SPLL Activity also requires boosting.

Increase engagement with FFC

The MTR recommends that engagement with FFC be strengthened with the submission of succinct annual reports and plans for the next reporting period. This will provide an opportunity for increased

visibility and ownership by members and potentially provide an additional vehicle for enhanced engagement.

Re-establish the Technical Working Group

The TWG should be formally re-established with the oversight and direction of executive management. The MTR recommends that the TWG has a clear terms of reference, executive management oversight and inter-Divisional engagement across the Secretariat (the Legal Unit, Fisheries Operations, IT, Fisheries Management and Fisheries Development). The terms of reference should set a regular meeting schedule, agree to tasks, roles, and responsibilities, and hold colleagues to account in terms of expectations.

Strengthen the Steering Committee's role

The role of the SC needs to be strengthened to achieve the oversight role envisaged in the ADDs for the three Activities, which included strategic guidance and monitoring progress.

The SC's role in the governance of all three activities can be strengthened by requiring a succinct executive summary of the APR prepared within one month of the end of the reporting period. The executive summary would simply extract key issues from the APR. The draft APR for the most recent reporting period, a finance report and an updated RMT would be included as annexes to the executive summary.

The executive summary should provide the basis of substantive discussion in the SC. Draft minutes for meetings of the SC should be circulated to SC participants within two weeks of the conclusion of the SC. Final reports, incorporating any feedback received, including revisions to the RMT, should be circulated to participants, or placed on a dedicated secure page on the FFA website, within six weeks of the conclusion of the SC. The current practice of delayed distribution of SC meeting reports, sometimes 12 months after the event, is poor practice.

Support a review of FFA's Information Management Services

Based on evidence presented to the MTR Team in relation to the three MFAT-support Activities, the MTR supports the need for an urgent comprehensive review of FFA's IT services. The review should focus on the delineation of IT focus areas between corporate systems and MCS operations systems and clearer division of responsibility and accountability of these between Corporate Services and Fisheries Operations.

Address the gender issues

Although the situation is reported to have improved recently, there is an immediate need to address any outstanding issues connected to the three MFAT Activities. It is also recommended that Activity management strengthen reporting systems to capture gender disaggregated information for the remaining period of implementation of the three Activities.

Improve meeting and Activity management

General project management focussing on (i) document management and (ii) meeting support also requires attention. This would be achieved by a combination of increased supervisory roles for the relevant manager, and/or planning for staff to receive intense project management training.

Strengthen monitoring and evaluation

M&E practices and processes also need considerable strengthening across PIPSM, CDEC and SPL. The SC needs to examine the APRs more closely and RMT updates to better monitor Activity implementation and enable timelier response/s to any challenges.

PIPSM and CDEC

The following summarises the recommended key actions to consider that are applicable to both PIPSM and CDEC:

Pilot PIPSM and CDEC initiatives

- The PIPSM and the CDEC Activities should offer opportunities to two or three FFA PIC members who have demonstrated a keen interest in engaging in the respective Activity to provide the platform for piloting Activity implementation.
The rationale is that, at the end of the Activity, more lessons will be available from the appraisal of a small number of comprehensively planned and implemented pilots than a broad regional endeavour that attempts to engage all FFA members who have a diverse range of needs and interests regarding PSM and CDS.

Promote synergies with PIPSM and CDEC Activities

- The potential linkages between the PIPSM and the CDEC Activities are particularly strong with much of the work programmed for support under the PIPSM serving as foundational for the CDEC. However, these have not materialised four years into the implementation of both Activities. More thought needs to go into how the synergies between these Activities will be achieved.

Fast-track development of SPC's e-CDS support tools

- It is recommended that SPC fast-track the further development of its e-CDS support tools. Opportunities to engage with FFA Secretariat's IT should be provided in relation to this, particularly in relation to linkages to the Regional Information Management Facility (RIMF), but these engagement efforts should not constrain SPC's progress in addressing this need. In consultation with FFA management, SPC should be invited to prepare a programme of work, with associated budget, for consideration under the CDEC Activity to support this action.

CDEC

The following summarises the recommended key actions to consider that are applicable to CDEC:

Revisit the Brisbane inter-agency workshop's recommendations

The 2019 workshop provided sound advice for a programme of work for support under the CDEC. Most of that work remains unattended to. It is recommended that the revised Implementation Plan incorporate:

- development of a CDS Activity Communications Strategy
- complete more detailed analysis of national supply chains for FFA Members' tuna products as country visits permit
- commission a fresh discussion paper to inform members consideration of national, sub-regional and regional e-CDS, as proposed by the Brisbane Workshop
- commission an analysis of the potential costs to FFA Members of a regional e-CDS compared to nationally implemented e-CDS and assesses these against the benefits. Include a discussion of the short- and long-term resourcing implications, and the potential for cost recovery.
- support the development and implementation of national and regional e-CDS through laws, regulations, licensing, agreements, contracts, etc, regulating fishing, fish processing and fish trading operators.

Re-examine needs of CDEC

When the CDEC and PIPSM Activities were conceived there was a strong sense that a regional approach would be of broad benefit and that the outcomes would apply to all FFA members. In the early stages of working towards this, it became apparent that countries are at different stages in considering both PSM and CDS and needs and priorities were not necessarily shared by all members. Given the delays since early work was undertaken to profile the status of national CDS and taking account of the work proposals that remain relevant from the Brisbane workshop, a rapid re-assessment of (i) the status, and (ii) CDS needs of FFA PIC members would be valuable for planning future CDEC support.

SPLL

The following summarises the recommended key actions to consider that are applicable to SPLL:

Revise the Activity logic

The Activity logic requires significant revision to reflect the changed strategy for the SPLL associated with the 2017 decision by the TKA to suspend consultations associated with the CMA. The revision should be undertaken in close consultation with SPC and MFAT.

Maintain SPC's capacity to provide on-going scientific advice

It is recommended that SPC OFP be invited to propose a two-year programme of work to continue its SPLL support to May 2024. Activities could include:

- in collaboration with FFA regarding economic implications, evaluate catch reduction pathways to achieve the TRP
- provide technical support to catch allocation discussions, including whether effort, catch or capacity-based in relation to both high seas and Exclusive Economic Zones (EEZs)
- evaluate compatibility and relationships between different management regimes with the intent to provide a 'common currency' across alternative management regimes
- support the harvest strategy work SPC is doing for the Commission

- provide information, including capacity building, to national fisheries administrations regarding the implementation and monitoring of management schemes
- development of E-products, electronic reporting (ER) and electronic monitoring (EM), to improve the timeliness and quality of longline data
- continue the design and development of national catch monitoring tools to enhance members' management capabilities, including data systems to utilise real-time data to provide reports (zone catch status, etc), catch visualisation tools and predicative, what-if scenario tools
- integrate southern longline modules into SPC's tuna data and stock assessment workshops
- support a Pacific Island Fishery Professional position at the OFP.

The MTR recommends that NZ\$1.5 million be transferred from SPLL Activity Outputs 2, 3 and 5 to Output 1 and 4 to support this work.

Continue the work on game theory and build on ANCOR's work

- The MTR is supportive of work on game theory continuing, on the basis that it is jointly supervised by FFA economists in the Fisheries Development Division and FFA fisheries managers in the Fisheries Management Division.
- The ANCOR initiative could provide the platform needed to re-invigorate discussions among FFA members on longline fisheries management. This work needs to be closely supervised by the Fisheries Management Division in the Secretariat.

Commission a political mapping exercise of all non-FFA members

- The MTR recommends that the SPLL commission a political mapping exercise that reviews the role and future aspirations of all key non-FFA stakeholders in the southern longline fishery as background information to support further discussion on candidate strategies for FFA members to engage and respond.

National catch management accounting module

The work anticipated through the development of a business case for the development of the catch management scheme (CMS) is still of potential significant national and regional benefit for FFA PICs engaged in the southern longline fishery.

The overall purpose of the original proposal in 2018 was to document the technical requirements, definitions, and specifications to support the design and development of a national catch accounting module (CAM) within a regional CMS system which was anticipated to be a first significant step towards the successful implementation of the CMS. The work was to include a review of existing national, regional, and sub-regional fisheries IMS in the context of developing the national CAM, on the basis that IMS are already collecting the main base data for the CAM. It would provide the basis for the development of a conceptual model that will assist in strengthening an understanding of needs and the elaboration of functional and technical specifications.

The MTR recommends this initiative be resurrected, the terms of reference be reviewed and agreed, and the drafting of a business case be commissioned.

Promote synergies with the CDEC Activity

While this functionality has not yet been effectively elaborated in either the CDEC Activity or the SPLL Activity, SPC has proceeded to develop prototype catch visualisation tools that, utilising ER from vessels among other data sources, provide PIC members with a facility to monitor and reconcile reported catches against limits, landings, and exports, including export destinations. This is important as it will embed CDS as part of national and regional fishery management arrangements, a key integral linkage which currently receives little apparent consideration.

It is recommended that the prototype be tested for broad implementation across TKA members, in the first instance.

Financial considerations

Based on the information available to the MTR, the drawdown of funds under the SPLL Activity to the end of 2020 amounted to 25% of the total Activity budget. Approximately 43% of the PIPSM Activity budget had been drawn down and for the CDEC Activity total drawdown of funds to the end of 2020 was 17% of the total budget.

The MTR is of the view that, given the significance of the South Pacific albacore to the fisheries of FFA PIC members, and on-going issues associated with the management of longline fisheries harvesting SPA, a no-cost extension of two years, through until October 2024, for SPLL is justifiable.

On this basis, it is recommended that SPC be invited to prepare a detailed proposal for the application of an additional NZ\$1.5 million towards efforts (across Outputs 1 and 4) over a two-year extension of the SPLL Activity. It is recommended that the additional NZ\$1.5 million be sourced from Output 2 (NZ\$200,000), Output 3 (NZ\$500,000) and Output 5 (NZ\$800,000).

It is recommended that FFA prepare a complementary two-year programme of work supported by the balance remaining in the Activity: approximately NZ\$3.822 million.

Detailed work plans for this period should be prepared by the FFA secretariat and SPC and comprehensively reviewed at the next Steering Committee.

The MTR also recommends that the PIPSM be extended, at no-cost, to at least May 2023. An outline of the activities that are candidates for support using this funding is presented in the report.

To maximise the potential benefits to regional and national CDS that the CDEC Activity opportunity provides, the MTR recommends that, subject to the preparation of a practical and realistic implementation plan, and commitments by the FFA Secretariat in regarding to strengthening policy and technical support to the Activity, a no-cost extension to at least October 2024 be considered.

The MTR also noted a lack of clarity in relation to the application of FFA's Management Fee and Management Support Fees. Data provided to the MTR indicate that there is no consistency in the way these items are budgeted, or expenditure reported. It is recommended that these components of Activity finances be reviewed.

1. Introduction

New Zealand is a founding member of the Pacific Islands Fisheries Forum Agency (FFA) and, through its regional development assistance programme and bilaterally with the 15 island members of FFA, has provided long-term development assistance to the fisheries sector across the Pacific Islands region. For the five-year period from 2014, New Zealand committed NZ\$66 million to support regional fisheries initiatives. A significant portion was reserved to support FFA-administered activities with lesser allocations to the Secretariat of the Pacific Community (SPC).

Two of the Activities included in the Mid-Term Review (MTR) – the South Pacific Tuna Longline Policy and Management (SPLL) and the Catch Documentation and Enhancing Compliance in Pacific Tuna Fisheries (CDEC) Activities – have components that are either implemented by FFA, by SPC or by SPC and FFA in collaboration with some input from the New Zealand Ministry for Primary Industries (MPI).

The third Activity, the Pacific Islands Port State Measures (PIPSM), is implemented by FFA. These Activities were formulated against policy direction enshrined in regional agreements, such as the Regional Roadmap for Sustainable Pacific Fisheries adopted by Pacific Island Leaders in 2015, and New Zealand's own priorities for its development assistance programme as described in its Aid Programme's Strategic Plan for 2015-2019.

At the time the three Activity Design Documents (ADDs) were drafted in 2016, FFA's 2005-2020 Strategic Plan made no reference to port state measures (PSM), catch documentation schemes (CDS), albacore, or longline fisheries. It did provide for significant attention to the development and implementation of appropriate fisheries management arrangements which would apply to South Pacific albacore. FFA's successor Strategic Plan, for the period 2020-2025, does highlight the importance of support for zone-based fisheries management. It also references support for the development of CDS and, although there is no mention of PSM, efforts to combat illegal, unreported, and unrelated (IUU) fishing through strengthened monitoring, control, and surveillance (MCS) initiatives are underscored.

Management, policy, and legal support provided through the Secretariat was intended to assist members to develop and implement arrangements that secure sustainable tuna harvests, maximise economic returns, and meet the international obligations of FFA members, particularly those obligations associated with the Western and Central Pacific Fisheries Commission (WCPFC). In addition, FFA's 2018-2023 Regional MCS Strategy includes provisions for supporting CDS and PSM initiatives of FFA members. On this basis, the three Activities do address national and regional priorities identified and agreed by FFA members.

In addition to critical attention to management arrangements, the policy advisory components of the fisheries management services of the Secretariat included the use of new systems and technologies and the development and implementation of monitoring, control and surveillance systems and

effective compliance regimes. All three Activities included in the MTR link directly to these services described in the Strategic Plan (2005-2020).¹

The Pacific fisheries environment is dynamic. There is continual change that occurs because of multiple factors ranging from environmental changes that affect the biology and distribution of tuna resources, political developments that impact fisheries relationships and partnerships, including fisheries access arrangements, operational changes among fleets responding to changing economic conditions, and changes relating to the management of regional tuna stocks such as those associated with the decisions taken at the WCPFC. In addition, since early 2020, the COVID-19 pandemic has had significant impacts on the operations and management of tuna fisheries in the Western and Central Pacific Ocean (WCPO).

As it is almost five years since the design and formulation of the three Activities scheduled for the MTR, there are numerous changes in the fisheries environment that may have affected their implementation. Some of these developments may have been accommodated as part of normal Activity management procedures endorsed by the Activity Steering Committee (SC). It may not have been possible to satisfactorily adapt the Activities to other more substantive developments.

A scan of developments in the last five years that may have had implications for the implementation of these Activities include changes in relation to the operations of the Te Vaka Moana (TVM) and regional developments affecting the Tokelau Arrangement for the Management of the South Pacific Albacore Longline Fishery (TKA).

In addition, the WCPFC has adopted numerous Conservation and Management Measures (CMMs) since 2015 that could have implications for the implementation of the three Activities. These include CMMs for South Pacific Albacore (CMM 2015-02) and PSMs (2017-02). The WCPFC has also established inter-sessional working groups (IWGs) to consider catch documentation schemes and South Pacific albacore. Other developments in the WCPFC, such as in relation to the implementation of the Compliance Monitoring Scheme (WCPFC-CMS), also have implications, particularly in relation to the CDEC and PIPSM Activities.

The MTR will also need to assess implications, if any, arising from the adoption of FFA's new 2020-2025 Strategic Plan and strategies that build on MFAT's 2015-2019 Strategic Results Framework.² MFAT's refreshed 2018-2028 Strategic Framework includes an IUU specific goal to reduce IUU fishing in the Pacific.

While the three Activities have discrete objectives, they are integrally related through a common goal to secure the sustainability of WCPO oceanic fish stocks for the long-term economic benefit of the island state membership of the FFA. The anticipated outcomes of each Activity have the potential to make a valuable contribution to the Regional Roadmap for Sustainable Pacific Fisheries endorsed by

¹ The emphasis on ecologically sustainable fisheries, securing the economic and social benefits from regional fisheries for FFA members and combating IUU, including strengthening FFA member's capacity as flag, port, and processing states, is carried forward to FFA's 2020-2025 Strategic Plan.

² Like all fisheries-related activities through the remainder of this decade, the time remaining for the implementation of the three Activities subject to review will benefit from a reflection on key international and regional strategies including Sustainable Development Goals, particularly Goal 14 *Life below Water*, the Regional Roadmap for Implementing the 2030 Agenda for Sustainable Development in Asia Pacific and the 2050 Blue Continent Strategy currently being developed by the Forum Secretariat.

Leaders at the Pacific Islands Forum (PIF) in 2015 and to the MFAT's Strategic Results Framework and priorities.

These three Activities were part of a significant investment in Pacific fisheries that were identified based on announcements by leaders at the PIF in 2015. New Zealand responded with a suite of investments that supported the goals and strategies prioritised in the Regional Roadmap for Sustainable Pacific Fisheries adopted by leaders in 2015 and the fisheries priorities in the New Zealand Aid Programme's Strategic Plan 2015-2019.³ The context for these initiatives and the longer-term implications are discussed further below.

1.1.1 The purpose of the Mid Term Reviews

The primary purpose of this MTR is to provide an evidence base to inform decisions to strengthen the design, governance, management, and implementation of an Activity as it is now and to provide practical recommendations to strengthen the Activity's future performance (see <https://www.ffa.int/tenders> CP16_2021).

Specifically, FFA and MFAT sought an MTR to:

- improve the extent to which Activity design is fit for purpose, coherent and aligns with New Zealand's and the Pacific Islands' strategic fisheries priorities, including the Regional Roadmap for Sustainable Pacific Fisheries
- improve effectiveness and efficiency of the three Activities by utilising the lessons learned in terms of what works, what does not and why. This was to include a focus on the design, purpose, management, governance, partnerships, and implementation of each of the three Activities.
- assess what progress has been made against the expected results (outputs and outcomes) and identify how the three Activities' current components can better meet their respective outputs and their short-, medium- and long-term outcomes
- recommend improvements to the design and operations of the three Activities, including opportunities to strengthen synergies, moving toward their respective end-dates.

The target audience for the MTR includes FFA's Executive, FFA's Fisheries Management, Fisheries Operations (including Information Technology (IT)), particularly staff associated with implementation of the Activities, MFAT, national fisheries administrations of FFA members, SPC, MPI and the Activity/Implementation Steering Committees.

1.1.2 Scope and focus

The MTR covers the three MFAT-funded Activities implemented by FFA:

- Pacific Islands Port State Measures (PIPSM)
- Catch Documentation and Enhancing Compliance in Pacific Tuna Fisheries (CDEC)
- South Pacific Longline Policy and Management (SPLL).

³ MFAT's refreshed 2018-2028 Strategic Framework includes an IUU specific goal to reduce IUU fishing in the Pacific.

The MTRs considered activities supported by the three Activities since inception until mid-2021.

In terms of evaluation criteria, relevance, coherence, effectiveness, efficiency, sustainability, and impact were the focus of the MTR. Attention was also given to efficiency and broader cross-cutting issues such as gender, other social issues, and the environment.

Key stakeholders involved in the MTR included FFA, as the implementing agency, and SPC, which was contracted to provide technical input to Activity execution. Activity beneficiaries (the national fisheries administrations in FFA's Pacific Island Country (PIC) members) and development partners, particularly MFAT, were also actively consulted. Other stakeholders that may have been exposed to the Activity activities, such as the fishing industry, port authorities and non-governmental organisations (NGOs), were also consulted opportunistically.

1.1.3 Key evaluation questions

The MTR focused on answering six key questions that were designed to identify insightful lessons to strengthen decision-making and meet accountability requirements. The questions related to relevance, coherence, effectiveness, efficiency, sustainability, and impact. The questions were:

1. Is the design of each Activity fit for purpose, relevant, coherent, and aligned with strategic and sector priorities?
2. What progress is being made towards achieving the Activity's outputs and short- and medium-term outcomes?
3. How effective and efficient has the management, implementation and governance of the respective Activities been?
4. How cost-effective is the approach employed to deliver results?
5. What needs to be done to strengthen the respective Activity's strategic alignment, design, management, governance, partnerships, and operations now and into the future?
6. What improvements could be made to further sustain and embed the outcomes sought from the Activities?

To address the key evidence needs, the Review had both a summative and formative focus. It has been guided by a utilisation-focused evaluation (UFE) approach to generate findings that are utility-focused, credible, timely and relevant.

It also used a practical theory-led approach, drawing on the Results Diagram/Logic to systematically assess to what extent Activity implementation to mid-2021 had achieved planned outputs and short- and medium-term outcomes, what were the major factors that influenced the implementation of the Activity activities and achievement of outcomes, and how the lessons learned from this experience can be harnessed or mitigated to strengthen the three Activities' performance now and in the future.

The approach used mixed methods where information and data were collected during interviews with key stakeholders, relevant documentation was reviewed, and analysis of available administrative Activity data was undertaken.

This process enabled the triangulation of quantitative and qualitative data from primary and secondary data sources to establish the requisite evidence base for the MTR. Evaluative judgements on the relevance, coherence, effectiveness, efficiency, and sustainability were made and tested with the MTR's Advisory Committee and other key stakeholders.

Approximately four weeks after the award of the contract to undertake the MTRs, Sapere submitted an Evaluation Plan to MFAT and the FFA Secretariat. The Evaluation Plan serves as an integral companion document to the MTR Report. In addition, the MTR Team undertook a review of progress against outputs and outcomes recorded in the ADD and annual Results Management Tables (RMTs). These are not appended to the MTR Report. They are provided separately to the FFA Secretariat and MFAT as companion documents.

The actual review was completed in five phases: Inception, evidence gathering, document review and analysis and key informant interviews, analysis and interpretation and reporting.

The document review and analysis included the following sources:

- ADDs
- finance reports and budgets
- SC and Technical Working Group (TWG) meeting documents and reports
- Annual Progress Reports (APRs)
- RMTs
- regional and national technical and policy documents prepared using Activity funding
- workshop and technical meeting papers and summary reports
- miscellaneous externally prepared subject matter reviews and research papers.

Our primary data collection involved virtual key informant interviews with the implementation partners (FFA and SPC) that are responsible for the governance, management, and implementation of the SPL, PIPSM and CDEC. These interviews included:

- fisheries management programme staff, particularly those staff directly affiliated with the Activities
- the Director-General, Deputy Director-General, and relevant corporate staff responsible for corporate management, administration, and finance.

In addition to learning from their first-hand experience in Activity implementation, the consultations provided an opportunity to understand the challenges experienced during Activity implementation, the responses to those challenges and how those decisions potentially influenced Activity outcomes.

Similar consultations were conducted throughout the MTR with MFAT, SPC and MPI staff and representatives from national fisheries administrations responsible for engagement with activities supported by the three Activities. These interviews included:

- responsible Activity-implementing personnel in national fisheries administrations, in participating FFA members, the SPC and FFA Secretariat colleagues
- personnel from other regional and sub-regional organisations such as WCPFC and the Office of the Parties to the Nauru Agreement (PNA)

- representatives of international agencies or institutions, civil society organisations or fishing industry bodies that were engaged during Activity implementation.

A total of 57 stakeholder interviews were conducted (see Appendix A).

Two members of the Review Team participated in most of the stakeholder interviews. Summary transcripts were drafted for review and analysis. The interview process offered full anonymity and confidentiality of any information shared. Structured questions, as described in the Evaluation Plan, were used to guide initial discussion. Supplemental questions were based on the for each 'type' of interviewee (e.g., those directly involved in implementation, agency colleagues (including ex-FFA staff), in the governance committees, national fisheries officials, and industry).

While some national fisheries officials willingly engaged with the MTR, others were less responsive to our requests for interview.⁴ This may have been because they were already overloaded with the huge work volumes associated with regional fisheries engagements (particularly preparations for FFA and WCPFC meetings). It may also have been because the Activities subject to this review were of secondary concern at the national scale, especially in the context of Covid.

1.1.4 Report structure

Following a short section relating to contextual matters common to all three Activities, the Report presents the results of the review of each Activity separately. The review of each Activity is structured as follows:

- background context
- key findings relating to the Activities' relevancy, fit for purpose, and progress made
- external and internal factors to FFA impacting on progress
- key recommended areas to address to strengthen the Activity going forward, including financial considerations.

Following the review of each Activity, a separate section concludes with key findings arising in the MTR that were identified for each Activity and that were also common to all three Activities.

The last section summarises key action areas for MFAT and FFA to consider addressing to strengthen the PIPSM, the CDEC and the SPLL Activities going forward.

Included in the appendices are separate examinations of the finances of each Activity and an initial evaluation of progress to date as provided for in the RMTs.

⁴ It was noted that this was not unique to this Review. Another FFA Review being undertaken at approximately the same time was experiencing similar challenges. It is also noted that, in early 2020, when the pandemic started to impact the possibility of conducting face-to-face meetings and the FFA Secretariat was in the early stages of engaging members virtually, the Secretariat experienced low response rates to questionnaires which were circulated as an alternative means to secure FFA member input to on-going initiatives, including the PIPSM (responses received from six members after three deadline extensions were offered).

1.2 Background context

This section briefly describes the environment that has impacted on the delivery of all three Activities – the PIPSM, CDEC and SPLL.

1.2.1 Delivering activities in a pandemic environment

The FFA Secretariat's support under the three Activities depends on the capacity to bring members together in regional workshops to strategize, discuss policy and agree to future action. There is also a significant reliance on an ability to travel to support in-country work associated with national information management systems, legal and policy reviews and development and capacity building. The pandemic had significant implications for this Activity delivery model.

SPC's components have largely been delivered through funded staff positions that can effectively deliver Activity outputs without the same reliance on regional travel. The pandemic did not impact SPC's activities to the same extent it impacted FFA's in terms of both outputs and funding drawdown.

Virtual meetings difficult but options limited

Back-to-back virtual meetings associated with the pandemic place unsustainable demands on small FFA PIC member fisheries administrations. The substantive discussion supported in face-to-face meetings and workshops does not occur in a virtual setting and, more importantly, the corridor and social discussion that is traditionally associated with meetings among Pacific Islands delegations is unavailable.

In addition, training and capacity building initiatives require face-to-face engagement for full effectiveness. While the theory for training courses may be delivered online, to secure longer-term benefits, follow-up physical in-person engagement is critical. This has impacted the three MFAT-Activities. The dilemma is that without virtual meetings, regional fisheries business would have effectively come to a standstill.

Some national-level stakeholders emphasised that their lack of engagement in various discussions was not necessarily a lack of interest but was more a reflection of the ability of the national fisheries administration to simultaneously service all the issues on the politically and technically complex regional fisheries agenda.

1.2.2 Legacy issues associated with the 2015 PIF announcements

In 2015, New Zealand announced a suite of investments that were promoted as supporting the goals and strategies prioritised in the *Regional Roadmap for Sustainable Pacific Fisheries* adopted by leaders in 2015 and the fisheries priorities presented in the New Zealand Aid Programme's Strategic Plan, 2015-2019. The subtext associated with this announcement is important as it had long-term implications for fisheries relations in the region.

At the 2015 PIF, and reported by Radio New Zealand on 11 September 2015, Prime Minister John Key announced New Zealand would provide NZ\$50 million over the following three years to "help the region change the way it manages declining fish stocks". Although the three Activities subject to this MTR were part of that NZ\$50 million funding package, Prime Minister Key was quoted as advising that

“Pacific Island countries agree their fisheries are going to be challenged if they stay on the present system of limiting fish take via the daily scheme”.

This reflected a strongly held view of New Zealand’s tuna industry, among others, that the way PICs (primarily the PNA) were managing access to fisheries within their exclusive economic zones (EEZs) under the Vessel Day Scheme (VDS) was doomed. However, a key driver for the New Zealand industry was the fact that the price for access that the VDS was commanding was unsustainable for less viable operators and, under the VDS, they faced significant financial insecurity.

Subsequently, in December 2015, *Pacific Islands Business* reported that New Zealand’s Ambassador for Economic Development, Shane Jones, was attending the December 2015 WCPFC Commission meeting in Bali where he was advocating for an across-the-board quota-based payment system rather than the PNA’s generally accepted VDS. Again, reflecting the lobbying of New Zealand’s industry, Jones argued a series of record catches was testing sustainability of the resource. In addition, he considered that escalating access fees risked destabilising PIC government budgets, which were then, as now, heavily dependent on tuna revenue.

This campaign to transition the region to a catch-based management system, which was not well received by the PNA member states,^{s6(a)}

Although COVID-19 is often cited as a reason for delayed implementation of the three FFA/MFAT Activities, legacy issues associated with the 2015 PIF announcements still do not sit well with some FFA members, notably some of the PNA. This is reported to have impacted on their engagement in the three Activities subject to this MTR.

2. Pacific Islands Port State Measures

2.1 Background context

The Pacific Islands Port State Measures (PIPSM) Activity was designed to respond to the need to reduce illegal, unregulated and unreported (IUU) fishing through improved monitoring of catch un-loadings, verification of fishing vessel activities, and a structured fishing vessel inspection regime based on IUU risk analysis. It provides for: the review of port state legislative and policy frameworks; implementation of electronic reporting by fishing vessels; the development of IUU risk analytical tools; support to Catch Management Arrangement information networks; and the development of port based IUU identification tools and response mechanisms.

The Activity's goal is to improve the measures that port States require fishing vessels to comply with as a condition for the use of their ports. The complementary relationship between the PIPSM and the CDEC Activity was acknowledged by ensuring that the linkages and consistency between PSM and Catch Documentation Systems (CDS) were to be maintained in the development of any national and regional PSM measures.

A regional port State measures gap analysis undertaken by FFA in 2017⁵ informed the development of a strategy and work plan to strengthen port-based MCS measures including the framework for the delivery of the PIPSM outputs. The Activity acknowledged national PSM requirements vary significantly between FFA PIC members depending on a range of factors. This meant that outcomes needed to be tailored to meet specific needs while promoting compatibility and consistency across the region through the development of regional standards and MCS networks using tools such as the Niue Treaty Subsidiary Agreement (NTSA).

The forecast outputs for this Activity are:

- Output 1: Framework for regional port state measures recognising international agreements developed.
- Output 2: National strategies and implementation tools developed.
- Output 3: Improved national regulatory and governance framework in PICs developed.
- Output 4: Training programme to implement port state measures developed and rolled out.

The Activity Design Document (ADD) noted the Activity would be informed by efforts in the WCPFC to develop and adopt a PSM conservation and management measure (CMM). At WCPFC14 in December 2017, the Commission adopted CMM 2017-02 for Port State Minimum Standards "to establish processes and procedures for CCMs to request that port inspections be undertaken on fishing vessels suspected of engaging in IUU fishing or fishing-related activities in support of IUU fishing."

⁵ MRAG. 2017. *Gap Analysis of FFA Member Port State Controls Against the FAO Port State Measures Agreement: Regional synopsis report*. Pacific Islands Forum Fisheries Agency, Honiara, Solomon Islands. March 2017. 50 pages.

At that time, CDS standards were being considered by a WCPFC CDS-Intersessional Working Group with the aim to adopt CDS standards at the WCPF Commission meeting in December 2017. It noted that progress on PSM was an important precursor to the development of a Commission CDS.

The ADD noted that outputs were interlinked and that the phasing and timing of implementation required careful management with several work streams that were co-dependent to happen concurrently. The importance of engaging as many PICs as is possible was acknowledged with the FFA Secretariat to provide leadership and encouragement.

The PIPSM is a five-year Activity, valued at NZD\$2,661,963. The Grant Funding Agreement for the Activity was signed in May 2017 with FFA as the Implementing Agency. FFA was required to provide funding directly to the Pacific Community (SPC) to, among other tasks, secure the services of a systems analyst for support to IT components of the Activity.

Governance for the Activity was vested in the Forum Fisheries Committee. The ADD proposed the establishment of an Implementation Steering Committee (SC – comprising FFA, MFAT, MPI and other relevant agencies as required) to take responsibility for considering and signing off on annual costed workplans and progress reports. The possibility of coordination and collaboration across the other two Activities being simultaneously implemented by the FFA Secretariat was considered an important consideration for the SC.

The ADD also proposed the creation of a technical working group (TWG) from among FFA Secretariat staff involved with day-to-day implementation of the Activity.

2.2 Key findings

2.2.1 Is PIPSM relevant?

The PIPSM Activity was relevant at the time the ADD was prepared and remains relevant in 2021. This is supported in numerous key regional policy documents which, apart from the Regional Roadmap for Sustainable Pacific Fisheries, include FFA's Strategic Plan (2005-2020 and its successor 2020-2025 Strategic Plan), FFA's Regional 2018-2023 MCS Strategy and WCPFC's CMM 2017-02 for minimum standards for PSM. It provides important additional resources to the FFA Secretariat to support FFA members efforts to strengthen their port State controls.

In addition to Australia and New Zealand, four FFA members are parties to the FAO PSM Agreement (Palau, Fiji, Palau, Tonga, and Vanuatu) and others are reported to be actively considering ratification or accession (for example, PNG and Marshall Islands). PSM will be of increasing importance if restrictions on at-sea transshipments, particularly those on the high seas, are increased and transshipment is required in port.

The PIPSM Activity addresses an important issue for a large proportion of the FFA membership. Consequently, the combination of the Secretariat's accumulated experience with the implementation of large multinational projects, the priority of the issue to be addressed and partnering with SPC in relation to data systems components, confirms that the modality for implementation of the PIPSM provided for in the ADD was appropriate. The PIPSM provides FFA members with a time-bound opportunity to address significant issues in relation to port State controls that otherwise might not

receive priority consideration if it depended on the assignment of limited funds from the Agency's core budget.

2.2.2 Is PIPSM's design fit for purpose?

The design, structured around the collaborative elaboration of a regional framework agreed by all FFA members, supporting compatible national level policy and legislative strengthening and the development of operational implementation tools, with associated capacity building, was fit for purpose at the time it was formulated. It remains appropriate in 2021.

The ADD acknowledged that implementation would be required to accommodate different needs among FFA PIC members. Factors impacting the level of PIPSM support and country engagement would be influenced by the capacity of FFA PIC members to integrate PIPSM-related activities into their programme of work and the national priority assigned to strengthening port State controls. FFA PIC members with ports supporting little or no fishing activity obviously had little motivation to engage.

The ADD identified public outreach and media campaigns as important elements of the Activity for the purpose of promoting the Objectives and the expected Outputs and to inform relevant stakeholders at the national, regional, and international levels regarding the support available through the Activity. An inter-agency workshop in Brisbane in August 2019 also advised that the Secretariat should develop a Communications Strategy or Plan to support the Activity. This was never actioned.

Based on FFA's extensive experience with the implementation of large complex Activities, the design also assumed that operational risks associated with securing the appropriate technical assistance and providing strong management and governance would be effectively managed by the FFA Secretariat. This was a reasonable assumption at the time the ADD was prepared.

The ADD may provide a solid platform for addressing medium- and long-term Outcomes. However, unless governance arrangements provide the required opportunities for strategic guidance and engagement, and appropriate expertise is assigned to Activity's activities (both in partner agencies, at SPC and FFA, and at the national level), these Outcomes will be severely compromised. These risks, which were identified by the ADD, have had a greater impact on Activity implementation than was anticipated at ADD preparation stage, at least as they relate to the FFA Secretariat.

2.3 What progress is being made?

The Activity design assumed significant progress towards achieving forecast Outputs in the first three years of implementation with evidence that short- and medium-term Outcomes were being achieved. Short-term Outcomes were identified as "... improved regulatory and governance frameworks for port State measures implemented and increased and demonstrated knowledge on how to apply port State measures using practical implementation tools". In the medium term it was envisaged that "improved functional port State measures would be operating effectively at national and regional levels". It was anticipated that the activities under the PIPSM would inform implementation of the CDEC. These design assumptions are appropriate and realistic.

2.3.1 How have stakeholders been engaged, priorities confirmed, and progress reported?

Significant PIPSM Activity resources were dedicated to the Regional PSM Framework involving several consultancies that provided foundational material and numerous workshops and meetings across the period 2018-2020.⁶ The work associated with drafting the Framework also contributed to other PIPSM Outputs relating to the national requirements to support PSM implementation (Outputs 2 and 3) and training (Output 4).

The regional port monitoring workshops were valuable opportunities to engage FFA members in PSM-related gaps assessment and priority setting and secure their collective input to PIPSM activities. A draft report is available for the first such Workshop (RPMW1, 26 February – 2 March 2018 at SPC Headquarters).

The draft report explains that RPMW1, which was jointly facilitated by FFA and SPC, was primarily an information sharing exercise that explored opportunities for developing regional synergies and for initial discussion on national PSM needs and priorities. Appendix 1 of the Draft Workshop RPSMW1 Report presents the key outcomes and recommendations of the Workshop. The recommendations covered areas such as data exchange and data integration for PSM, reviews of national port monitoring needs, and legislative and policy reviews to support the application of e-tools in port monitoring that could potentially be addressed under the PIPSM Activity.

In addition, issues such as data standards, data quality and the importance of inter-operability among IM systems were covered. The workshop was co-financed by the PIPSM and the Oceanic Fisheries Management Activity, funded by the GEF (GEF OFMPII) and implemented by FFA.

Records of Activity-supported initiatives (scoping, assessment of PSMA obligations, MCS strategy development and e-port support) and one-on-one discussions regarding national PSM-related priorities are available in tabular form for Cook Islands, FSM, Fiji, PNG, Samoa, Solomon Islands, Tonga, Tuvalu, and Vanuatu. These serve a sound basis for formulating future national-level support from the PIPSM that remains to be operationalised. While some discussions have been undertaken with the remaining FFA PIC members, such as Marshall Islands, plans for further engagement of those countries remain unclear.

Activity management reported to SC4 (July 2020) that assistance to the Cook Islands had been provided with the engagement of a consultant to assist with PSM scoping, but discussions with other countries was slow.

The FFA Secretariat also provides substantial legal advisory services to FFA PIC members, which may include PSM-related legislative reviews. The extent of the contribution of such advisory services to the PIPSM by the Legal Unit was not verified by the MTR Team, but FFA Secretariat legal unit staff participated in some of the national workshops supported under the PSM in collaboration with FAO.

⁶ Blaha, F. and Johnson, D. 2018a. FFA PSM Consultancy. Task #1&2. Port Activities Study and Framework for effective PSM in FFA's membership. Final Draft Report. 59 pages. Blaha, F. and Johnson, D. 2018b. FFA PSM Consultancy. Task #3. Port State measures and market access requirements. Draft Report. 18 pages. Blaha, F. and Johnson, D. 2018c. FFA PSM Consultancy. Task #4. IUU risk assessment criteria for PSM. Draft Report. 39 pages.

However, the provisions of the RMT relating to the number of PICs with improved policies and legislation supporting PSM in place, and being used because of PIPSM interventions, was not available at the time of the MTR.

RPMW2, 4-8 March 2019, noted the need for the RPSM Framework to consider regional and international obligations including FFA's Regional MCS Strategy (2018-2023), the HMTCs and FFA member's differing needs and priorities. PSMW2 also recommended minimum data and information requirements to support risk assessment (Appendix V of the Report) and on-going concerns regarding integration of PSM-related data and information to national and regional IM systems. In this regard, the workshop recommended that the NTSA (Annex A) be reviewed to assess opportunities to share data and information to support PSM. The Cook Islands' experience with cost recovery was discussed and options for port monitoring canvassed.

RPMW2 recommended minimum data and information requirements (Workshop Report, Appendix V) to support risk assessment and noted value in utilising data from regional data systems. The workshop recognised the emerging importance of data analytic skills and the need to develop training in this regard (relevant to PIPSM Output 4). It recommended that the risk assessment criterion to support PSM developed by the FFA Secretariat be considered by the MCSWG22.

RPMW2, together with additional drafting of the Regional Framework, identified the following challenges associated with developing and implementing PSM in the region:

- national, regional, and international PSM obligations
- the lack of clarity of the roles and responsibilities of relevant agencies
- poor inter-agency cooperation and coordination
- the lack of adequate legal frameworks
- the lack of integrated information and data management systems
- the lack of information exchange, data flow and data sharing
- communication between relevant States
- options for cost-recovery from industry
- training needs
- the lack of sufficient resources and capacity.

The workshop noted the importance of the Regional PSM Framework (RPSMF) to guide national implementation, build national capacity and support the necessary cooperation and coordination between relevant national agencies and States.

RPSMW2 noted that a baseline desk-top study review in early 2018 of port-based activities against 63 measures reflected the regional and international best-practice principles and guidelines. This formed the basis for recommendations to improve existing port-based activities and programs, regional MCS tools and new initiatives across 18 activity areas relating to both PSM and CDS development.

APR3 (May 2020) reported that turnover of IT capacity within the Secretariat resulted in stalled progress on the e-PSM prototype. It was suggested that the required work needed to be outsourced to an IT consultant. As early as 2017, the rapid development and application of electronic reporting tools and emerging technologies, such as ER, were identified as developments that needed to be

programmed into the Activity and that, to achieve it, close collaboration between FFA and SPC to investigate viable applications would be beneficial (APR1, May 2018).

After initial approval of the RPSMF at FFC110 in May 2019, minor amendments were incorporated in 2020 prior to its formal adoption by FFC114, June 2020 (Year 3 of PIPSM Activity implementation). APR3 (May 2020) highlighted progress with the development of the RPSMF as the main achievement for the PIPSM to date.

SC4 (July 2020) was advised that planned Activity support for implementation of the Framework included process mapping exercises to support the development of e-tools to facilitate transition from manual to electronic systems (which had been commenced in February 2020). It was noted that this work was also important for future catch documentation and traceability schemes. It was reported that 90 per cent of the e-PSM processes had been built into the prototype. Port monitoring and departure clearance remained to be completed. The presentation to the SC noted that the plan was to secure the participation of three FFA members to pilot the applications.

RPMW3 was convened virtually in April 2021. It considered a list of priority actions relating to risk assessment criteria, regional data standards, system inter-operability and data sharing, national PSM strategies and policies, standard operating procedures, port entry, use and inspection standard operating procedures (SOPs) and dockside boarding and inspection training (DSBI).

In addition, although apparent limited IT capacity in the Secretariat had been identified as a constraint to further development of e-PSM tools, the workshop received a demonstration of progress with developing e-PSM (port entry and port use – digitised data collection and workflows) which utilised the information generated from the February 2020 mapping exercise. In this regard, coordination with SPC on data sources and data standards is critical.

The key outcomes of the RPMW3 were to agree to risk criteria to support implementation of the Regional Framework, to agree to regional data standards to support both PSM and CDS (including data sharing considerations), and to support priorities concerning national PSM policies, regulations and strategies, SOPs, operational risk assessment processes, design and implement e-PSM at the national level, establish mechanisms to facilitate inter-agency collaboration and undertake DSBI training. A strategy for addressing outstanding e-PSM tool development needs, testing and roll-out (implementation plan) was not available to the MTR.

Progress with this endeavour since SC4 and RPMW3 is unclear. The MTR recommends that FFA and SPC collaborate to develop an implementation strategy to reinvigorate work associated with the recommendations from RPMW3 for the PIPSM. The strategy will require a clear description of the types and sources of technical expertise required to complete this component within the PIPSM timeframe.

Consultations with nine FFA members virtually in February 2021 provided the basis for identifying national PSM-related priorities. This summary was presented to the SC5 which met in April 2021. No report for that meeting was available to the MTR, but some FFA members expected the PIPSM could assist with a comparative analysis of the pros and cons associated with ratifying the PSMA, aligning domestic processes with the WCPFC PSM CMM and the FAO PSMA, developing SOP for PSM, supporting any required policy and legislative reform, and building capacity in supporting national PSM.

In relation to M&E, the 2017 APR (APR1) reported additional work was planned to develop appropriate reporting tools with the assistance of SPC-OFP M&E personnel. Although this initiative was not mentioned in the ADD, the MTR Team recommends that opportunities to improve monitoring and learning experiences of the Activity be explored.

2.3.2 What has been achieved to date?

The eventual adoption of the RPSMF by FFC114 in 2020 was the primary achievement of the PIPSM Activity in its almost four years of implementation. Although there has been some useful early foundational work relating to a baseline appraisal of national PSM arrangements, market state requirements (which is more relevant to the CDEC Activity), the draft IUU risk assessment criteria, e-PSM tool development and some preliminary support at the national level (nine FFA PIC members including to PNG for the development of PSM SOPs and a legislative review to expand on their PSM requirements to accommodate CDS and Solomon Islands in relation to the e-Noro initiative), the PIPSM Activity has made limited progress towards the short- and medium-term Outcomes described in the ADD.

2.4 External factors to FFA impacting on progress being made

2.4.1 FAO Port State Measures Agreement (PSMA)

The FAO PSMA came into force in June 2016. This led to additional political pressure on FFA members to accede to the PSMA. As a result, the Secretariat received increased requests for assistance for legal and policy reviews and assessments related to potential PSMA ratification, national-level PSM gap analysis and capacity building. This had implications for the proposed original scheduling of PIPSM Activities.

Implications took two forms. Firstly, the FFA Secretariat was called upon to support PIC members' consideration of the implications for ratifying or acceding to the PSMA. Evidence of this is available in the form of the records of Activity-supported initiatives (scoping, assessment of PSMA obligations, MCS strategy development and e-port support), and one-on-one discussions regarding national PSM-related priorities are available in relation to Cook Islands, FSM, Fiji, PNG, Solomon Islands, Tonga, Tuvalu, and Vanuatu.

Secondly, the FFA Secretariat was requested to support the preparations and participation of FFA PICs in meetings of the Parties to the PSMA. The PIPSM, in collaboration with PEW and TNC, supported 13 PICs to the MOP2 PSMA Preparatory Meeting in Tonga in 2019 and, in 2020, provided support to MOP3 which included Parties (Samoa, Tonga, Vanuatu, Fiji, Australia and New Zealand) and non-Parties (RMI and PNG as prospective Parties, and Solomon Islands).

These activities provided a foundation for meaningful collaboration with FAO, the PEW Charitable Trust (PEW) and The Nature Conservancy (TNC) which were active in FFA PICs promoting strengthened port measures. The Activity also supported FFA PIC participation in FAO Workshops on PSMA gap analysis (Federated States of Micronesia (FSM), Kiribati, Marshall Islands and Nauru) and two in-country FAO PSMA Workshops were supported by FFA staff (Tonga and Vanuatu).

2.4.2 In WCPFC

FFA members collaborated with Japan at WCPFC14 in December 2017 to adopt a CMM on Minimum Standards for Port State Measures (CMM 2017-02). While not a comprehensive Measure, it provided additional stimulus for addressing PSM-related issues for FFA members regionally and nationally, with particular relevance to Outputs 1 and 3 of the PIPSM.

2.4.3and the pandemic

Since early 2020, national-level engagement has been constrained because of the pandemic. This has been the main external influence on Activity implementation. To supplement efforts to engage virtually, Activity staff circulated a questionnaire in April 2020 to raise awareness and to provide opportunities for FFA members to convey national needs that might be addressed under the Activity. The questionnaire was comprehensive, comprising 48 questions. Following three extensions to the initial deadline, six responses from members were eventually received by July 2020. Such poor engagement creates significant challenges for Activity implementation.

2.4.4 National-level inter-agency collaboration and coordination is critical

A critical component of the effective implementation of PSM at the national level is inter-agency engagement, coordination and information sharing. This is an important consideration in the preparation of a national PSM strategy. The preparation of such a strategy would include stakeholder identification, the description of legislative basis, roles and responsibilities, information, and data mapping and IMS systems supporting PSM. The PIPSM is well placed to provide this type of support.

2.5 Internal factors to FFA impacting on progress being made

2.5.1 Managerial oversight and technical capacity

In relation to internal factors, the first APR (APR1, May 2018) reported that a combination of heavy work demands in the inception stage and the need to maintain proper procurement processes created delays in accessing required technical expertise to commence some of the initial work. APR1 reported that administrative work had been completed and a tender process resulted in the initial contracting of four preferred suppliers (three covering MCS and policy and one MCS training) to support the Activity.

The APR reported that the PIPSM Activity placed significant demands on technical staff within the Agency but that the appointment of an Activity Administrative Assistant would provide some relief for those staff. Although it was suggested that additional expertise would be engaged for the Activity under contract, no further contracts have been awarded through to the time of the MTR (late 2021).

Although FFA Secretariat has a history of high staff turnover relative to other regional agencies, the period since the commencement of the implementation of the PIPSM has witnessed significant

movement of staff. Many of the staff that have departed the Agency in this time have had varying roles in the implementation of the PIPSM. Changes among key personnel include the Deputy Director General, Director (Fisheries Management), MCS Policy Advisers, key FMAs and IT staff.

Consequential impacts relate to reduced Secretariat capability to provide the leadership required to achieve effective implementation, to coordinate and manage supporting technical activities and engage and motivate members. This was exacerbated in early 2019 when the Activity Manager advised of her departure and the Activity Administration Officer was assigned implementation oversight for both the CDEC and PIPSM, in addition to other duties. Without engaged managerial oversight and technical support, it was unfair to place this responsibility on the administration officer.

In late 2019, the CDEC Activity recruited a CDS Technical Adviser who was tasked with supporting operational implementation across both the CDEC and PIPSM. The pandemic has meant that regional travel associated with this post has not been possible, with the result that the support for national level activities has not materialised to the extent envisaged in the ADD.

2.5.2 Secretariat internal coordination and collaboration

FFA Secretariat internal and external stakeholders reported poor internal coordination and collaboration among key units within the Secretariat. For the PIPSM, in addition to Corporate Services in relation to personnel and budget matters, internal engagement would be expected across the Legal Unit, Fisheries Operations and the IT section, coordinated through the Fisheries Management Division, which is delegated responsibility for PIPSM implementation. The fact that poor collaborative arrangements have persisted since early inception stages of the Activity was a consequence of the absence of senior management/executive intervention to provide strategic direction.

The unproductive working relationship between the IT section⁷ and Fisheries Management was particularly consequential for the PIPSM given the emphasis on the development of e-PSM tools. Rationally, it could be assumed that IT would provide the expertise necessary to support the planned e-tools development integrating these to existing regional services such as RIMF with associated support to national IMS.

As an indication of the internal frustrations with IT support, in April 2017 Secretariat staff prepared a 'situation analysis' that, among other matters, proposed a need for a complete review of FFA's information requirements in line with all aspects of its business needs – the Secretariat's, and its services to FFA members. The MTR Team was advised that the submission resulted in no substantive action regarding concerns about FFA's IT services. As recently as 2020, the Activity reported that turnover of IT capacity within the Secretariat resulted in stalled progress on the e-PSM prototype and suggested that the required work needed to be outsourced to an IT consultant (APR3, May 2020).

Consequential impacts of the relative absence of strategic direction relate to reduced Secretariat capability to engage and motivate members on a critical issue of shared interest and to explore and test strategic options. As observed elsewhere in this MTR, this was compounded by significant

⁷ IT services, and the relationship to the three MFAT-supported Activities in the FFA Secretariat, arguably attracted the most passionate engagement from both internal FFA Secretariat and external stakeholders.

workload across other work programme areas that has been sustained by the Secretariat over several years.

The MTR was advised that a broad governance review of the FFA is planned for 2022.

2.5.3 Supplemental support from SPC

Engagement with SPC on the PIPSM, despite the provisions of funding for a systems developer, has been limited to date. SPC's contribution to the Activity is more indirect through its participation in the CDEC Activity. In addition, the utilisation of FFA Secretariat staff to support the development of e-PSM tools has meant that the possible contributions of SPC in this regard were not explored.

2.5.4and MPI

The ADD anticipated the New Zealand Ministry for Primary Industries (MPI) technical support would be available to the PIPSM Activity. Although there has not yet been significant input from MPI, MPI staff have supported operational tasks at the national level. For example, the drafting of SOP and capacity building for a PSM inter-agency task force in Tonga. MPI support has been provided separately through the Pacific Capability Initiative funded by MFAT.

2.6 Managing, implementing, and governing the PIPSM

2.6.1 The Forum Fisheries Committee

There is limited evidence that the Forum Fisheries Committee (FFC) has been provided with the opportunity to assume a primary role in the governance of PIPSM as envisaged in the ADD. Periodic updating may have been provided to FFC as part of routine annual reporting provided by the Secretariat, and FFC certainly considered initiatives that had received support from the Activity, such as the Regional Framework, but the governance responsibility envisaged in the ADD was essentially delegated to the SC.

For all three Activities, the MTR recommends that engagement with FFC be strengthened with the submission of succinct annual reports and plans for the next reporting period. This will provide an opportunity for increased visibility and ownership by members and potentially provide an additional vehicle for enhanced engagement.

2.6.2 The Technical Working Group

As proposed in the ADD, the FFA Secretariat established a TWG to advise on technical and operational implementation of the CDEC and the PIPSM and to coordinate FFA Secretariat activities associated with both Activities.

In late 2018, the TWG met for the first time. The issues covered in that meeting included the work required of the four contracted consultants including the market State requirements review, baseline evaluation of PSM-related arrangements in FFA members and the IUU risk assessment criteria. Issues associated with the first (report preparation) and second (scheduling) RPMW were also discussed.

Administrative issues discussed included document access arrangements and collaboration within the FFA Secretariat and more broadly with external partners.

A month later, in January 2019, the TWG met to discuss the status of issues covered during TWG1. No new tasks were added to the agenda, although the draft report for RPSMW1 from March 2018 and a costed 2019 work plan were provided to the Group. Apart from an Excel spreadsheet recording tasks, there was no substantive record of discussion prepared for either of these TWGs.

In 2020, the TWG met three times to consider PSM and CDS activities. At the first meeting in early March, issues discussed included prototyping of e-PSM and CDS tools, minimum data elements, the Regional Framework, national work for Cook Islands, Tonga, Tuvalu, Solomon Islands and Samoa, traceability standards (for CDS), arrangements for a business case analysis (for the CDEC developed in collaboration with SPC), preparations for a questionnaire to be circulated to FFA members and plans for a CDEC Technical Consultation and Workshop. The notes from TWG1 and 2 in 2020 (both dated 3 March 2020), apart from identifying the need to liaise with SPC on work they were undertaking in relation to the CDEC, were effectively the same.

On March 16, the TWG met for a third time in 2020. The meeting reviewed developments with the e-Noro initiative and efforts to encourage inter-agency collaboration in Solomon Islands, tasking for discussions with IT regarding further development of the e-PSM prototype and PSM-related scoping work in Cook Islands. The TWG also discussed the status of CDEC-supported activities associated with the development of the Regional CDS Framework. There are no other records of TWG meetings since.

The Secretariat did convene the TWG proposed in the ADD. Although meeting reports are light on detail, the TWG demonstrates an endeavour to engage appropriate expertise within the FFA Secretariat in Activity implementation. The MTR Team was unable to determine the reason for the discontinuation of these potential important meetings although, as is evident in relation to other components of the Activity, it may be the result of poor strategic guidance.

The MTR recommends the TWG be re-established with clear Terms of Reference, executive management over-sight and inter-Divisional engagement across the Secretariat (the Legal Unit, Fisheries Operations, IT, Fisheries Management and Fisheries Development).

2.6.3 The Steering Committee

The ADD envisaged the establishment of a SC comprising FFA, MFAT, MPI and other relevant agencies. It suggested its role was to include responsibility for considering and signing off on annual costed workplans and APRs. The possibility of coordination and collaboration across the other two Activities being simultaneously implemented by the FFA Secretariat, the CDEC and SPL Activities, was considered an important consideration for the SC.

The first SC in October 2017 covered mainly administrative matters including the Implementation Plan, budget matters and the role of the SC.

The second SC, in November 2018, considered the Implementation Plan, costed work plan, and revised results measurements table which was endorsed by the SC. Five FFA members participated together with Secretariat staff, MFAT, PEW, TNC and FAO representatives. PEW, TNC and FAO presented on their activities to the SC, and FAO provided information relating to access to funding

support under the FAO Part 6 Assistance Fund. The Secretariat acknowledged the need to engage external partners to share information on related work. Issues discussed that were impacting implementation of both the CDEC and PIPSM included national capacity to engage and the need for support in relation to legal issues, communications and awareness raising.

SC3 was convened in April 2019. It received updates on PIPSM activities including the RPMW2 (March 2019) which considered Activity-sponsored work relating to the draft PSM Framework (which was forwarded to MCSWG22), the identification of minimum MCS requirements, market State requirements, and development of the IUU risk assessment criteria for PSM. The SC noted the Secretariat aspiration to finalise the Regional Framework and then focus on national strategies using multi-disciplinary teams. The SC was also advised of plans to prepare a short brief describing the Framework. The SC3 was attended by one MFAT representative and FFA Secretariat staff.

SC4 met in July 2020 shortly after the adoption of the RPSM Framework by FFC114. Five FFA members were represented together with representatives from SPC, MFAT and the FFA Secretariat. The summary report of the meeting covers budgetary matters and an update on operational activities. SC4 was advised of planned Activity support for implementation of the Framework and process mapping exercises in support of e-tools development to facilitate transition from manual to electronic systems (which had been commenced in February 2020). It was noted that this work was also important for future catch documentation and traceability schemes. It was reported that 90 per cent of the e-PSM processes had been built into the prototype with port monitoring and departure clearance remaining to complete.

The presentation to the SC noted that the plan was to secure the participation of three FFA members to pilot the applications. The activities supported against each of the Outputs were listed. The Secretariat reported that, while the Activity had engaged a consultant to provide support to Cook Islands, with PSM scoping, other national work planned for Samoa, Solomon Islands, PNG, and Tuvalu had not progressed due to the pandemic. The pandemic also impacted plans to hold a CDS/PSM Workshop. This resulted in the distribution of a questionnaire which experienced a very low (six FFA members) response. The SC noted the impact of staff turnover at the Secretariat, low member country engagement, and possible confusion over the relationship between the RPSM Framework, the WCPFC PSM CMM and the FAO PSMA on Activity implementation.

The Secretariat has convened annual sessions of the Steering Committee and provided MFAT with annual APRs. In relation to the SC, although the ADD suggested that the SC consist of representatives from the FFA Secretariat, MFAT, MPI and other agencies, in practice, meetings have occasionally included FFA PIC members. This was positive.

However, as observed elsewhere in this MTR, SC meeting support could be improved. The areas that require strengthening include version control for meeting discussion documents, archiving of meeting material, and the management of meeting reports. The management of meeting reports includes the timely preparation of a draft summary report with an invitation to participants to provide comments and revisions, and the circulation of a final meeting outcomes report. This would have a positive impact on efficiency in terms of improving access to material that traces the evolution of the Activity and provides a more effective record for accountability purposes.

In relation to APRs, it is noted that the four APRs (2017-2020 inclusive) submitted to date were prepared six months after the conclusion of the reporting period. This is an inordinately long period for this administrative task.

APR1 in 2017 advised that the SPC would be approached to provide advice in relation to developing and implementing processes to support monitoring and evaluation. This does not appear to have been actioned. It is recommended that this possibility be explored and instituted for the remainder of Activity implementation. At a minimum, M&E processes, including more detailed SC examination of APRs and RMT updates, need considerable strengthening.

The MTR Team was aware of occasional opportunistic meetings between MFAT and FFA Activity staff and executive management. In addition to including reviews of the RMT, these meetings had been used by MFAT to query the apparent slow progress with PIPSM implementation, prior to the pandemic. Although the pandemic has subsequently impacted Activity implementation, there is little evidence that these discussions resulted in substantive responses within the FFA Secretariat to address the concerns raised.

2.7 How cost-effective is the approach employed to deliver results?

As with the other two Activities implemented by the FFA Secretariat and funded by MFAT, the approach takes advantage of significant corporate knowledge, experience, and deep understanding of WCPO fisheries, including institutional arrangements supporting them, in the FFA Secretariat and the SPC OFP. In this regard the design is cost-effective. Alternative arrangements would not benefit from the established institutional arrangements and country relationships supported by these agencies.

However, PIPSM implementation experience to date does raise questions regarding the possibility of achieving greater value for money through a more proactive approach motivated by a stronger strategic vision from the FFA Secretariat. While the collaboration with PEW, TNC and FAO has been useful to date, there is limited evidence that the outcomes of these initiatives have provided the PIPSM with substantive guidance for candidate activities to be supported under the Activity.

In a similar way, the summaries of one-on-one discussions with the nine FFA members consulted to date, while serving as evidence of engagement, provide no substantive indication that they have led to a defined programme of work that leads to practical benefit for the FFA PIC members concerned. It is almost a case of an event qualifying as an outcome without consideration of the substance of issues considered at that event and the decisions, they support⁸. In addition, apart from their participation in the inter-agency meeting in April 2019, there is limited apparent engagement with the PNAO which could lead to implementation efficiencies, at least for the FFA PNA members.

⁸ Except perhaps for PNG which benefited from the presence of the CDSTA in country because of the pandemic and associated constraints on regional travel. Support to PNG included PSM SOP development after initial scoping was carried out in 2020, a Review of the 2017 PSM Gaps and Constraint Matrix as a contribution to PNG's consideration of acceding to the PSMA, and facilitation of an inter-agency PSM workshop.

2.8 Options for improving implementation of the PIPSM

Opportunities to strengthen the prospects for the PIPSM to meet the short- and medium-term Outcomes identified in the ADD include the following.

2.8.1 Strengthen executive oversight

The Activity requires increased engagement and strategic oversight by executive management in the FFA Secretariat. This will improve the identification of needs and the marshalling and coordination of resources appropriate to address those needs. It will also lead to more cost-effective implementation and increased regional and national benefits flowing from a significant funding opportunity which has a limited time frame.

2.8.2 Re-establish the Technical Working Group

The TWG should be formally re-established with the oversight and direction of executive management. It should engage technical and policy staff across all Divisions in the Secretariat, operate to agreed ToR, set a regular meeting schedule, agree to tasks, roles, and responsibilities, and hold colleagues to account in terms of expectations.

2.8.3 Require more of the Steering Committee and strengthen Secretariat support for its meetings

As observed elsewhere in this MTR, SC management needs improvement. The areas that require strengthening include version control for meeting discussion documents, archiving of meeting material, and the management of meeting reports. The management of meeting reports includes the timely preparation of a draft summary report with an invitation to participants to provide comments and revisions, and the circulation of a final meeting outcomes report.

APR's serve as important reference material for SC meetings. The four APRs (2017-2020 inclusive) submitted to date have been submitted almost six months after the conclusion of the reporting period. This is an inordinately long period for this administrative task. Activity management should endeavour to submit APRs within one month of the conclusion of the reporting period.

2.8.4 Strengthen Activity management

Activity management requires strengthening. This relates to Activity planning, stakeholder engagement, resource mobilisation and allocation, monitoring and reporting, records management, Activity communications, Activity partnerships, meeting management, and monitoring and evaluation.

APR1 in 2017 advised that the SPC would be approached to provide advice in relation to developing and implementing processes to support monitoring and evaluation. This does not appear to have been actioned. It is recommended that this possibility be explored with the objective of strengthening the M&E for the remainder of Activity implementation.

In addition to increased managerial oversight, the MTR recommends staff be offered the opportunity to receive dedicated project management training and capacity building.

2.8.5 Increase policy and technical support

The Activity will continue to require the support of the Legal Unit particularly in regard to national strategies to support PSM development and implementation. Technical staff with professional MCS experience, particularly with experience in PSM, need to be assigned to the Activity. Ideally, this expertise would be on staff in the Secretariat. If that expertise is not available in FFA, then external expertise should be secured under contract.

Appropriate IMS expertise also needs to be secured to support the finalisation of e-PSM tools. If the required expertise is not available on-staff at the Secretariat it should be sourced under short-term contract.

It is critical that this work be integrated to RIMF and be undertaken on a collaborative basis with the PNAO and SPC.

2.8.6 Insist on inter-Agency coordination on e-tools development

A key outcome of the RPMW3 was agreement that regional data standards to support both PSM and CDS (including data sharing considerations) required significant work. Progress with this endeavour is unclear. The MTR considers this requires priority attention and that FFA management should commission senior staff to i) undertake a detailed review of the status quo, and ii) develop and implement a strategy to address the needs identified by RPMW3.

The relative roles and responsibilities of regional agencies for developing e-systems to support CDS and PSM between SPC, FFA and the PNAO needs to be clearly articulated. The DCC is perhaps best placed to manage the coordinating arrangements for this undertaking.

2.8.7 Improve communications

APR4 reported that a fact sheet was under development that would summarise what the RPSMF is, what it is not and its linkages to other existing arrangements at the international and regional levels. This task was reportedly commenced in November 2020 and a draft version was available for review in February 2021. The fact sheet had not been completed at the time of the MTR.

In the absence of travel because of COVID-19, and to solicit better information regarding FFA PIC member needs and expectations in relation to the PIPSM, a questionnaire comprising 52 questions was circulated to members several times between April and December 2020. The deadline for responses was extended on three occasions, by which time only six FFA PIC members had responded. One-on-one discussions with members were undertaken to supplement questionnaire responses.

Although the CDEC and PSM Activities did acknowledge the potential utility of a Communications Strategy (refer to the Inter-agency Catch Documentation Scheme Workshop, Brisbane, August 2019 report and the CDEC 2020 APR), it does not appear to have been drafted nor resourced. Such a plan became more important as the possibility of travel to countries by Activity staff was removed with the advance of COVID-19. The MTR recommends it be prepared as a priority.

2.8.8 Select two or three countries to pilot Activity initiatives

Without adversely limiting equitable access to PIPSM support for all FFA PIC members, Activity management should explore options for focusing its engagement with several members on specific components of PSM. Such pilots could cover national-level operationalisation of appropriate elements of the RPSM Framework, review and strengthening of national policies and legislative provisions, the development of systems, processes, and operational procedures to support national level PSM, support for national IMS with integrated e-PSM tools and capacity building.

The rationale is that, at the end of the Activity, more lessons will be available from the appraisal of a small number of comprehensively planned and implemented pilots than a broad regional endeavour that attempts to engage all FFA members who have a diverse range of needs and interests regarding PSM.

2.8.9 Financial considerations

The status of the PIPSM budget is reviewed at Appendix B.

The MTE recommends the PIPSM Activity be extended, at no-cost, to May 2023. Priority work in the time remaining includes:

- develop a Communication Strategy that profiles PSM-related developments in the FFA region and the support available through the PIPSM Activity
- promote PSM-related policy and legislative review and development support available through the PIPSM Activity
- fast track the development of the e-PSM prototype which aligns with the regional PSM framework and facilitates the transition from manual to electronic systems
- revise the risk assessment criteria for PSM
- strengthen inter-agency (FFA, SPC and PNAO) coordination for regional data standards (includes CDS) to clarify data standards (minimum requirements), promote interoperability, clarify, and develop data sharing potential and confirm data sources
- support FFA members' engagement in the WCPFC CMM 2017-02
- support national training needs assessment and support capacity building including through additional Dockside Boarding & Inspection Training (DBIT)
- undertake a study of containerisation in Pacific regional ports to assess potential gaps in PSM processes that may serve as loophole for IUU fishing.

3. Catch Document and Enhancing Compliance

3.1 Background context

The overarching goal of the CDEC Activity is “A functioning CDS, built upon improved Pacific MCS Programmes, delivering increased traceability of Pacific caught tuna, ensuring IUU product is not entering the system and maintaining and enhancing market access.”

The CDEC Activity stated focus is on building an integrated electronic system connecting regional and national regulatory and monitoring, control, and surveillance (MCS) programmes. It is to include the identification of catch certification and market State requirements and to develop the tools necessary to meet all CDS needs for FFA members in relation to key CDS components. This will concentrate on catch legality and traceability of fish and fish products as they move through the supply chain.

The CDEC ADD provided for a review and analysis of existing CDS and relevant operational systems, MCS programmes, and market State requirements to inform the design of a fit-for-purpose e-CDS framework for FFA members. SPC was included as an implementing partner to provide technical support to the Activity by contributing fisheries data collected through monitoring activities, data audits and validation processes, and to develop regional tools to support e-CDS.

The ADD described support for the development of an e-CDS that would integrate fisheries information, ensure system integrity and security, and interoperability between national and regional systems. The ADD noted that this needed to consider national IT infrastructure and internet capabilities to support e-CDS. The on-going costs of data and document management, infrastructure requirements and training needs were to be factored into future budgets for funding at national and/or regional levels. The ADD provided for the development and implementation of e-CDS training programmes for FFA members, fishing industry and other relevant stakeholders.

The Activity also sought to address MCS deficiencies in fisheries monitoring and surveillance programmes, to improve monitoring of the supply/movement of fish and facilitate traceability. The FFA was to complete a supply chain mapping exercise to inform the scope and complexity of CDS design as well as identifying potential trade requirements, chain of custody processes required to assure various certification schemes (particularly Marine Stewardship Council (MSC) certificates) and to identify where formal relationships may need to be developed between different trading partners and market States.

The ADD acknowledged challenges in monitoring high seas fishing activities and transhipments. Additional monitoring and control mechanisms (such as regulated measures and clarifying electronic data ownership and data sharing) were to be investigated. Intelligence tools were to be developed to facilitate better monitoring of fish caught by vessels that spend prolonged periods at sea and where multiple transhipment events are likely. This could include a combination of, for example, increasing observer coverage, employing electronic monitoring (EM), port-to-port monitoring requirements, implementing more stringent transhipment controls and monitoring, and requiring improved reporting and monitoring of processors and exporters.

Development of electronic reporting standards and implementation of electronic reporting (ER), with standards generally based on the advice of the tuna Data Collection Committee (DCC), development

of integrated information management systems (IMS) by regional and national fisheries authorities, capacity building for MCS practitioners through regional competency-based training and national training workshops, and improvements to data and resource sharing mechanisms, such as implementation of the Niue Treaty Subsidiary Agreement (NTSA), were activities identified to underpin a CDS and supported by the CDEC Activity.

Four outputs were included in the ADD for the CDEC:

- Output 1: Regional framework for an electronically based CDS developed.
- Output 2: National electronic CDS strategies and implementation tools developed.
- Output 3: National regulatory and policy frameworks for electronically based CDS in PICs developed.
- Output 4: National and regional tools to implement electronic CDS developed and rolled out.

MFAT committed funding of NZ\$4,929,968 over five years to support the Activity. The Grant Funding Agreement between MFAT and the FFA Secretariat for the Activity was signed in June 2018.

3.1.1 FFA and SPCs' roles

A Letter of Agreement (LoA) was signed by FFA and SPC in October 2018 to support SPC's contribution to achieving Activity Outputs through to February 2022. The LoA specifies that SPC's obligations were associated with assuming a lead role in respect of Output 4 concerning the development and enhancement of tools used to acquire data (specifically logbooks, unloading/packing lists, observer, and port sampling data) feeding into the proposed CDS. The emphasis was on the transition from paper forms to e-reporting and the automated inter-linking of these data types and other data types used by the proposed e-CDS system. This responsibility extended to capacity development related to these tools (awareness, training, and education programmes). The LoA also committed SPC to participation in the Steering Committee and Technical Working Group (TWG).⁹

The MTR notes that there is a fine distinction between the titles applied to Outputs 2 and 4. Apart from the regional component associated with Output 4, there is only a subtle difference. However, the individual tasks described for the two Outputs in the ADD clearly intend that the development of e-tools and strategies is supported under Output 2, and communications, capacity building and outreach is supported under Output 4. Although the Letter of Agreement FFA signed with SPC describing SPC's role in the implementation of the Activity refers to the development of e-tools, under Output 4, in practice, this has not constrained SPC's progress in relation to the e-tools development work.

In response to questions to Activity administrators regarding the budget implications for this, FFA explained that funding for SPC's work is not drawn from Output 4 but is paid from FFA's Management Fee charged to the Activity. Although apparently not adversely impacting SPC's services under the

⁹ As reported in APR3, the CDS/PSM TWG was a substitute for the CDEC TWG proposed in the ADD. It did not involve SPC staff.

Activity, this confusing administrative arrangement should have been attended to at inception with appropriate revisions considered by the SC.

The ADD assumed that FFA would provide inputs from its current staff complement that were to be supplemented by specific skills and staff resources, e.g. legal, CDS experts, systems analysts (based at FFA), and fisheries monitoring and data management expertise (based at SPC). The budget provided for this additional short-term expertise as required. The Activity provided for the inclusion of SPC technical inputs to support integration of existing regional databases and for the investigation and development of technological solutions.

It was anticipated that FFA and SPC would have an important role in results monitoring and reporting, with an expectation each would commit time and resources to undertake monitoring tasks *using an agreed methodology*. FFA members and their officials and stakeholders, i.e. not just the Agency, were also expected to contribute to monitoring activities. No 'agreed methodology' appears to have been formulated and applied.

The ADD acknowledged the importance of incorporating CDS developments to relevant regional and national monitoring and control programmes and processes, in particular information systems managed by FFA, SPC, and PNAO. This was partly to ensure that data flows are facilitated under relevant information security and management policies and procedures.

3.2 Key findings

3.2.1 Is CDEC relevant?

Discussions in the WCPFC concerning a Commission CDS from 2014 to 2017 demanded FFA attention and engagement. In the same period, additional motivations for FFA members to engage in CDS-related activities were motivated by the EU's application of its yellow card provisions under its 2008 IUU Fishing Regulation to six FFA PIC members, and the implementation of similar legislation to deter IUU fishing by Japan and the USA. The growth in MSC certification across numerous WCPO fisheries, on-going pressure from NGOs to address IUU fishing and the uptake of traceability schemes by retailers in some of the largest global markets for WCPO tuna all served to underscore the relevance of CDS at the time the ADD was designed.

The ADD aligned with FFA member strategic priorities. Since implementation of the Activity commenced in 2018, FFA members have adopted a new Strategic Plan for the Agency to serve the period 2020-2025, replacing the 2005-2020 Strategic Plan. This provides strategic guidance for the Agency's programme of support to MCS frameworks. This is further elaborated in the 2018-2023 Regional MCS Strategy. Consistent with the MCS Strategy, in 2021, FFA adopted a Regional PSM Framework. The operationalisation of significant components of the Framework will be the focus of support under the PIPSM Activity.

The CDS framework definition was endorsed at the FFC110 in May 2019. After undergoing several substantive revisions, including in several sessions of the MCSWG, the Framework was adopted by FFC118 in 2021. Support for the development and negotiation of the RCDSF was provided through the CDEC Activity.

Since 2016, national and regional MCS IMS systems have been strengthened because of a combination of national and regional initiatives. The status of national and regional IMS are important considerations in mapping the development of a CDS. However, while some of these developments were associated with the PNA Fisheries Information Management System (FIMS), including PNG FIMS, at the end of 2021 there is no evidence that port State measures (PSM) or CDS-related IMS systems have been developed for deployment on the Regional Information Management Facility (RIMF) at FFA.

The CDEC ADD is explicit in terms of its purpose. It is to implement a CDS that prevents the entry of IUU fish to the supply chain, strengthen traceability to verify catch, develop systems to substantiate the legality of catch and provide a means to verify compliance with market State requirements for fish imports and Regional Fisheries Management Organisation conservation and management measures (CMM).

The CDEC ADD's relevance would have been strengthened if the Activity's purpose was integrally linked to management arrangements for specific fisheries. This would be achieved by supporting integrated systems that incorporate vessel details, vessel logbook reporting, landings data, processing and export data and VMS data. This was advocated by during early discussions on the purpose of a CDS in the WCPFC where FFA members advocated a bottom-up approach to CDS development including to, *inter alia*:

- reflect the broader fisheries management regime and fisheries management goals
- be compatible with and support existing national and sub-regional e-CDS initiatives
- adopt a standards-based approach that supports greater incorporation of national and sub-regional priorities
- offer the ability to incorporate the different fisheries management objectives of FFA Members and sub-regional groups
- integrate and build on national tools
- prioritise inter-operability.

The MTR recommends that the CDEC:

- undertakes a rapid refresh review of the status of existing national CDS among FFA member PICs
- develops an implementation strategy to serve the remainder of Activity implementation that incorporates the principles outlined above as key elements of future CDEC work.

3.2.2 Is CDEC's design fit for purpose?

Noting that the activities supported under the CDEC are among many inter-related and complementary initiatives underway in the fisheries sector in the region, the five-year Activity was expected to achieve tangible results in the short- and possibly medium-term.

Like the PIPSM Activity, the ADD design anticipated the development of a regional framework that would be agreed by all FFA members. This was to provide the guidance required to support compatible policy and legislative strengthening at the national level and the development of operational implementation tools, with associated capacity building. For the CDEC Activity, the implementation tools were to focus on e-tools for facilitating the digital transfer of required data and

information taking advantage of new technology associated with, for example, ER. The MTR notes that the FFA Secretariat is simultaneously implementing a second project aimed at strengthening the efforts to minimise IUU fish entering the supply chain, the Pacific EU Maritime Partnership Programme funded by the EU. On the basis that the PEUMP is focussed on providing support to industry and facilitating access to market States, and that effective internal coordination will be achieved, apart from the obvious lack of an integral link to fisheries management arrangements, the CDEC ADD remains appropriate in 2021.

The inter-agency workshop in Brisbane in August 2019, although more than 12 months after the commencement of the Activity, provided useful guidance for testing the appropriateness of the Activity design.

The workshop proposed that an analysis of the key drivers for national and regional e-CDS, including IUU risk and an assessment of the benefits of developing and implementing a regional e-CDS for tuna and tuna products in the Pacific, would be beneficial. In addition, an analysis of the potential costs to FFA Members of a regional e-CDS – compared to nationally implemented e-CDS, weighing these against the benefits, a discussion on the short- and long-term resourcing implications and the potential for cost recovery strategies – would assist in informing FFA members' decisions in relation to the appropriate implementation model.

The workshop proposed that an appraisal of approaches to implementation of national and regional e-CDS through laws, regulations, licensing, agreements, contracts, etc, would be of additional value. The FFA Secretariat did arrange for a review of market access requirements, as part of a report reviewing port State measures funded under the PIPSM Activity, and a supply chain mapping review for a FFA e-CDS, both under short-term consultancies (see footnote 6). The other suggestions arising from the workshop have not received attention to date (see discussion below).

The ADD identified different capacity among FFA PIC members to integrate developments associated with CDS and the desirability of ensuring that the Activity did not contribute to increased capability gaps between members as key considerations during implementation. Factors impacting the level of CDEC engagement would be influenced by national priorities relating any market State requirements, noting that some FFA PICs had limited exports of fishery products (e.g., Niue and Tokelau).

The ADD identified the need for a Communication Strategy under Output 4. This was to promote the Objectives and the expected Outputs of the Activity, particularly in relation to capacity building, and to inform relevant stakeholders regarding the support available through the Activity. The inter-agency workshop in Brisbane in August 2019 confirmed the need for a Communications Strategy or Plan to support the Activity. This had not been actioned at the time of the MTR.

Based on FFA's extensive experience with the implementation of large complex Activities, the design also assumed that operational risks associated with securing the appropriate technical assistance and providing strong management and governance would be effectively managed by the FFA Secretariat. This was a reasonable assumption at the time the ADD was prepared.

The ADD appears to provide an appropriate enabling platform for addressing the medium- and long-term Outcomes envisaged for CDS in the region. These Outcomes will be compromised if the governance arrangements that provide the required opportunities for strategic guidance and engagement is not in place, and/or if appropriate expertise is not assigned to Activity's initiatives

(both in partner agencies, at SPC and FFA, and at the national level). These risks, which were identified by the ADD, have arguably had a greater impact on Activity implementation than was anticipated at ADD preparation stage, at least for the FFA Secretariat.

3.3 What progress is being made?

The long-term target specified in the ADD, that all Pacific-caught tuna will be verifiable and an e-CDS will be functional across the FFA region, has a 2028 timeframe. That is well beyond the conclusion of the CDEC Activity. However, the indicator of progress in relation to this Outcome recorded in the ADD relates to traceability.

In terms of progress towards the medium- and short-term forecast Outcomes, some progress has been made, although the extent to which the CDEC Activity has influenced that is currently only verifiable in the form of the Regional CDS Framework (RCDSF) adopted by FFC118 in 2021. The medium-term Outcome relating to MCS and PSM frameworks that detect, deter, and respond to IUU fishing in the Pacific has, at least partially, been improved.

Both the CDEC and PIPSM Activities were formulated around a logical building block approach. The first step was to establish a regionally agreed framework and then focus on national implementation objectives and strategies. Unfortunately, challenges in achieving a shared understanding on roles and responsibilities supporting this implementation model continue to cause delays.

The first two years of implementation of the CDEC Activity were invested in developing the RCDSF. Consequently, the flow on to national level legislative support was slow to roll out. Two years to complete the first stage handicaps subsequent activities in a five-year Activity.

A Regional PSM Framework was adopted by FFC114 in 2020 but the extent to which that has been elaborated and operationalised among FFA's PIC members varies significantly. To an extent this is determined by the use of PIC member ports by fishing vessels. Similarly, in respect of the second medium-term Outcome concerning the consistent application of CDS by PIC fisheries, some FFA PIC members (e.g., PNG, Fiji, Solomon Islands, Kiribati, RMI) have progressed the development and implementation of national CDS. However, there is not yet consistent application by PICs fisheries administrations, and synergies and regional harmonisation remain underdeveloped.

PNG, Fiji, Solomon Islands and Kiribati have adopted EU market access CDS systems. They are reported to be satisfied with the current level of functionality and have no short-term intentions to develop generic national CDS systems. The Marshall Islands is working on their EU Competent Authority (CA) accreditation with an associated CDS system. Discussions are underway with Tonga regarding the possibility of a national CDS system, but progress is reported to be slow. Samoa has also commenced work to establish its CA (with World Bank funding support). The Federated States of Micronesia has assigned priority to implementation of PSM.

SPC has piloted the development of national catch accounting and national export summary systems which demonstrate significant potential to service national CDS needs. The system is reported to be ready for testing in a national setting and SPC and FFA are planning to progress this in Tonga in early 2022.

The PNA FIMS CDS platform is reported to not be fully utilised since its creation five years ago. PNG is the only PNA member that fully utilises its PNG FIMS CDS module. Despite members not utilising the PNA FIMS CDS platform, they are actively using the PNA vessel monitoring system (VMS) system for CDS and PSM risk assessment and checking the compliance status of fishing vessels.

The development of CDS in the region continues to struggle for strategic direction. There remains confusion among FFA members regarding the distinction between the role of the WCPFC and the roles of Members. There is a view that the Commission should set the standards and leave it up to Members how they implement those standards. The extent that this is exactly what is happening at present is uncertain but several members, such as PNG, Fiji, Solomon Islands, Marshall Islands (in progress) and Kiribati have made significant progress with the development of a system to support CDS largely in response to requirements for access to EU markets. The MTR was unable to learn what standards and protocols apply to these domestic systems, but regional benefits will be dissipated unless there is an effective regional coordinating effort. At present, the FFA Secretariat appears unable to provide that service.

There has been little progress in the Commission since 2017 on CDS. This is partly a result of lack of attention to the development of standards, a task that the FFA Secretariat volunteered to lead, and the challenge of negotiating with other CCMs in the Commission regarding the form of a Commission CDS. This is partly driven by the EU's concerns which are associated with potential elevated costs for WCPO product landed into EU markets resulting from a large number of individual CDS whereas the EU prefers a Scheme based on a Regional Fisheries Management Organisation (RFMO) model where they have considerable experience in organisations such as ICCAT and CCAMLR. However, issues of concern also reportedly relate to auditing, data sharing and accreditation.

FFA members are of the view that they are only capable of applying CDS to the point of export and first unloading and that responsibilities cease beyond there further into the supply chain. They point out that FFA members neither have the capacity, nor the obligation, to extend further into the supply chain.

Some evidence of the detection, deterrence, and responsiveness of FFA members to IUU fishing in the region is provided in two reports that attempt to quantify the value and volume of IUU fishing in tuna fisheries within the Pacific Islands region. Both reports were commissioned by the FFA Secretariat.^{10,11}

One was commissioned in 2016 and the second, to evaluate change, in 2021. The 2021 review estimated that there was a considerable reduction from the 'first cut' estimate of IUU fishing in the region presented in the 2016 study. The reasons for the reduction were associated with substantial reductions in estimates for illegal transshipping and fishing on fish aggregating devices (FADs) during the closure period, improved information available for analysis and changes in fishery dynamics. It also reflected considerable efforts by FFA Members to combat IUU fishing since 2016. It is not possible to determine the extent, if any, that the CDEC or PIPSM Activities implemented by the FFA Secretariat contributed materially to this reduction.

¹⁰ MRAG Asia Pacific. 2016. *Towards the quantification of illegal, unreported, and unregulated (IUU) fishing in the Pacific Islands region*. Pacific Islands Forum Fisheries Agency. Honiara, Solomon Islands. 101 pages.

¹¹ MRAG Asia Pacific. 2021. *The quantification of illegal, unreported, and unregulated (IUU) fishing in the Pacific Islands region – a 2020 update*. Pacific Islands Forum Fisheries Agency. Honiara, Solomon Islands. 125 pages.

There was a view that discussions within the FFA community relating to the development of a CDS to date have been dominated by stakeholders with a primary interest in MCS and enforcement, combatting IUU and traceability systems to prevent IUU product entering the supply chain. While the CDEC includes a long-term outcome directly related to this endeavour there is concern that CDS discussions have neglected the potential value to improve the profitability and competitiveness of domestic industry (industry representatives participated in the first CDEC Workshop in 2021) and to link CDS discussions to initiatives associated with management of fisheries.

The MTR notes that, while there may be limited engagement of industry in the CDEC Activity to date, the FFA Secretariat is implementing a second Activity, the PEUMP financed by the EU, that provides significant support to industry and strengthened compliance with market state requirements. This underscores the need for strong internal engagement and coordination within the FFA Secretariat.

3.3.1 How have stakeholders been engaged, priorities confirmed, and progress reported?

Although the ADD acknowledged the close linkages to the PIPSM Activity, this was not addressed in the Implementation Plan that was the outcome of an undated two-day inception meeting for the CDEC convened in Honiara in October 2018, which involved FFA, SPC and MPI staff. The purpose of the meeting was to consider priority actions for the first year of the CDEC Activity. It was the consensus of the meeting that the initial focus of the Activity should be on regional work leading to the planned development of a Regional CDS Framework. National work would follow on the basis that mapping and scoping of national work was dependent on the structure of the Regional CDS Framework. The Implementation Plan provided that members that were already developing their national CDS would continue in that endeavour concurrently.

The Implementation Plan proposed the CDEC Activity be implemented in three phases:

- *Phase 1.* Multi-agency, multi-disciplinary team of SPC, FFA staff and consultants to visit to up to 10 FFA PIC members to undertake and national CDS profiling involving policy and legislative reviews, data mapping, IM systems descriptions, an assessment of gaps and needs, including in relation to capacity building leading to the drafting of a national CDS Implementation Strategy. The Strategy would include resourcing requirements and cost-recovery possibilities.
- *Phase 2.* Implementation of the national CDS Implementation Strategies.
- *Phase 3.* Roll-out of the national e-CDS and assistance with system refinements to support MCS and legal/regulatory/policy frameworks.

It was planned that an Activity implementation team would be led by a CDS Advisor (CDSA) to be recruited in Year 1 and based at FFA to take primary responsibility for the day-to-day management and coordination of the Activity. An Activity Administration Officer would provide administrative backstopping with the costs for that position drawn from the PIPSM Activity. Consultant technical advisors ("TAs") with expertise in areas including CDS, MCS, fisheries policy and law, communications, training, business analysis, and ICT would be recruited, as needed, to provide necessary short-term implementation support.

As proposed in the CDEC ADD and discussed in the PIPSM Activity section, the FFA Secretariat established a Technical Working Group (a PSM/CDS TWG as opposed to a CDEC TWG) to advise on technical and operational implementation of the CDEC and the PIPSM and to coordinate FFA Secretariat activities associated with both Activities.

An annual Steering Committee (SC) also met. Until the pandemic these meetings often took place in the margins of other fisheries meetings. SC1 (November 2018) reviewed the terms of reference for the SC and noted that there was provision for three FFA members to be represented on the SC. Six FFA members, in addition to New Zealand, participated in SC1. SC1 also proposed an MTR for 2021. Activity staff advised that a TWG had been functioning within the Secretariat involving key staff and that the composition of the TWG would change according to needs. SC1 was also advised that the Secretariat would endeavour to circulate the minutes for its meetings two weeks after each meeting.

A work plan and associated Gantt chart was presented and accepted by SC1 and it was agreed that these would be shared with members. This is apparently not done partly because members advised the Secretariat that they did not require that level of detail concerning project implementation. The Secretariat advised that limited capacity in national administrations to absorb tasks associated with the CDEC and PIPSM posed an implementation risk. In fact, subsequently, APR2 reported that timelines would already need to be pushed back due to implementation delays.

SC2 (April 2019 – draft summary report) included one FFA PIC member representative (RMI). MFAT, MPI, SPC and FFA participated. The presentation to MCSWG22 on the Activity's initiatives formed the basis of the presentation to SC2. The Secretariat reported on the outcomes of the one-day discussion reserved for CDS in the RPMW2 in March 2019 noting agreement of a definition of a regional framework, that several members had shared their national CDS experience and that PNG and the PNAO were supportive of a regional approach to CDS implementation. The definition for the Regional CDS Framework was adopted by FFC110 in 2019 was:

- *A Regional e-CDS Framework provides the key elements, processes, technologies, and responses necessary to ensure legality and traceability of FFA Member's fish and fishery products throughout the supply chain (harvest to market).*

A costed work plan was presented to SC2 noting that, originally, the focus in 2019 had been on baseline work programmed under Output 1 and support for the development of the RCDSF. It was planned that this work would serve as a platform to address Outputs 2, 3 and 4 in 2020 but this had been delayed. The RMT, as revised with MFAT, was also presented.

The first Annual Progress Report (APR1, June 2019) reported four consultants had been recruited to provide technical support to the Activity in association with the PIPSM. Delays were reported in relation to (i) recruiting the CDS Technical Adviser and (ii) the development of a Communications Strategy. The APR reported that PIPSM Activity resources were utilised to support several consultancies (see footnote 6), that provided foundational material, and numerous workshops and meetings for both the CDEC and PIPSM Activities were supported across the period 2018-2020.

APR1 also reported that a training exercise in PNG for port fishing vessel arrival, clearance and unloading control, undertaken by one of the contracted consultants, resulted in 35 participants trained, 14 per cent of whom were women. This is one of the few instances of disaggregated reporting on gender participation in CDEC-supported activities.

Under Output 2, SPC reported, pending the recruitment of the FFA CDS Technical Adviser, a range of tasks associated with the CDEC had been undertaken in the first reporting period. In addition to their participation in RPMW2, SPC reported further enhancements to TUFMAN2, testing and further development of *Onboard* (deployment on two vessels in Tonga and two in Samoa) and *Onshore* (supported by field visits and some user experience testing in FSM and RMI), both of which involved some training, initial work on the blockchain initiative (using supplementary funding available through SPC), and work to load cannery data to TUFMAN2 (for potential future use in a CDS).

A three-day inter-agency (FFA, SPC and PNAO) CDS workshop was convened in Brisbane in August 2019 to develop a common understanding of the structure and function of a Regional CDS and identify priority actions. In addition to proposing a CDEC workshop for early 2020, the workshop prepared a draft Regional CDS Framework and allocated tasks to advance the Framework. It was agreed that the next critical step was bringing together FFA Members for a workshop ahead of MCSWG in 2020. In preparation for an FFA Member CDEC workshop, the key tasks identified included:

- Prepare a workshop report for the Brisbane workshop that includes:
 - the draft Regional e-CDS Framework (as emerged from the workshop discussions)
 - an updated CDS Activity workplan.
- Recruit the CDS Technical Advisor.
- Develop the CDS Activity Communications Strategy.
- Prepare a background analysis of port traffic.
- Map the supply chain for FFA Members' tuna products.
- Develop a discussion paper to inform members' consideration of national, sub-regional and regional e-CDS, which will include:
 - an analysis of the key drivers for national and regional e-CDS including IUU risk, and the benefits of developing and implementing a regional e-CDS for tuna and tuna products in the Pacific
 - a description of the two primary options suggested for possible consideration:
 - i. a regional e-CDS - a hybrid model with a regional level "post-box" or "registry" where existing national and sub-regional systems would connect and feed key information (noting that not all information collected by those systems would be fed to the regional e-CDS). It would also provide the structure for simple national systems to be developed to fill existing gaps.
 - ii. a set of national and possibly sub-regional systems designed to meet national needs (i.e., similar to that currently emerging in the region). It was recognised that these were not the only options that might be considered and the type of e-CDS appropriate for FFA Members would be further informed by this analysis, supply chain mapping and discussion among members on objectives and issues to be addressed.
- Analysis of the potential costs to FFA Members of a regional e-CDS compared to nationally implemented e-CDS and weighing these against the benefits.
- A discussion on the short- and long-term resourcing implications, and the potential for cost recovery.

- Identification of approaches to implementation of national and regional e-CDS through laws, regulations, licensing, agreements, contracts etc regulating fishing, fish processing and fish trading operators (Activity Initiative 1.3.1).¹²

This advice is re-produced here because it provides a sound foundation for a programme of work for support under the CDEC following the workshop. As most of that work remains unattended to,¹³ it now also serves as a guide for future work under the Activity. The inter-agency workshop noted “the current level of resources and capacity within FFA was a risk to timely implementation of the Activity”. Compounded by the pandemic, this concern appears to have been confirmed.

The supply chain mapping exercise that was supported by the CDEC in 2020 is a valuable initial review of the status of national systems to support CDS. However, as an initial review, it simply presents a baseline assessment that requires follow-up in most of the countries profiled. The country profiles presented include information of the complexity of domestic value chains, the status under Section 7 of the EU Catch Certificate requirements, inter-operability between national and regional systems such as the PNA’s FIMS CDS, national IMS and electronic traceability systems. The report provides an initial assessment of needs in each country that could be addressed through the CDEC Activity. The importance for a regional initiative to promote inter-operability with mature national CDS, such as PNG’s, was underscored. This report provided a useful foundation for future work under the CEDC.

The proposed CDEC Workshop scheduled for early 2020 was postponed due to the pandemic.

APR2 (April 2020) reported that country visits (to Fiji and Samoa), discussions with FFA PIC members in the margins of other meetings to assist with mapping national priorities and needs, and the recruitment of the CDS Technical Adviser in December 2019 had assisted with country consultations and led to a reduced dependence on consultants. In response to an inability to travel because of the pandemic, it was reported that a CDS survey was circulated to 14 FFA members to assist with identifying national-level work that might be supported under the Activity. The development of a Communication Strategy was put on hold pending the adoption of the RCDSF. APR2 noted that the recruitment of IT consultants to assist with the Activity was delayed pending the recruitment of the CDS Technical Adviser.

In relation to Output 2, SPC reported that *Onboard* was deployed on 40 vessels and that logbooks were being received from 76 vessels, that *Onshore* had collected data for 252 trips and that a first trial of an observer application, *Olo*, had been successful. In addition, SPC had demonstrated TUFMAN2’s traceability component utilising SPC’s e-tools to FFA in April 2020.

In relation to the development of regional tools to support the CDS, the CDEP has supported some high-level process mapping but there has been no apparent development of conceptual models or details of functional and technical specifications to provide guidance on the potential integration of regional CDS services to FFA Secretariat IM systems.

¹² Note that some activities are being implemented under this recommendation (for example in PNG, Solomon Islands, Vanuatu and Tonga) and some members, for example FSM, are addressing related initiatives using external consultants.

¹³ Except for a supply chain mapping study presented as a draft report to the CDEC1 Workshop in February 2021. Blaha, F. 2020. *Supply chain mapping for a FFA e-CDS*. Draft Report. 28 pages.

APR2 reported that, in January 2019, the CDEC and PIPSM Activities had organised a meeting for all technical staff across the FFA Divisions to raise awareness of the Activities. The TWG, which was convened for the first time in late 2018, continued for five meetings through to early 2019 in an endeavour to achieve strong internal coordination. APR2 reported that discussions with staff responsible for other FFA Activities funded by the World Bank, EU and the GEF, which supported activities related to CDEC activities, was initiated in the first quarter of 2020. A mapping exercise to identify potential synergies, and to avoid duplication was undertaken. It was agreed that the EU-funded PEUMP Activity offered the most risk of confusion among FFA members but, as the PEUMP was focussed on support to industry, the risk of confusion was assessed as minimal.

APR2 reported on the RPMW2 that was held in the first quarter of 2019. Fifteen FFA members participated in the 5-day workshop with one full day dedicated to CDS discussions. This led to the broad definition of a regional CDS Framework. The APR reported that it was strategically appropriate to define the Regional Framework prior to supporting substantive national level work and so the development of the Framework dominated the Activity's initial work.

SC3, convened in May 2020, included representatives from three FFA PIC members, MPI, MFAT, FFA and SPC. The Committee received an update on implementation progress since the commencement of the Activity in July 2018, noting the relationship to the PIPSM Activity, the supply chain mapping, the adoption of the CDS Framework definition by FFC110 in May 2019, a review of the Draft Framework, the cancellation of the planned 2020 CDS workshop, and the appointment of the CDS Technical Adviser in December 2019.

SPC updated the Committee on progress under Output 2 relating to preparing for e-CDS through updates to TUFMAN2, including integration to iFIMS, and the development of applications (*Onboard*, *Onshore* and *Olo*), utilising advances in ER and, utilising supplemental funding available to the SPC, Quick Response (QR) code scanning to support traceability. The SC was alerted to concerns regarding limited standardisation of IM systems supporting CDS particularly at the national level. The country visit to Samoa and Fiji was noted. At this meeting MFAT expressed concern over the slow drawdown of Activity funds. The Committee received brief presentations from related activities also implemented by the FFA Secretariat (PEUMP and the GEF-financed OFMPII). A proposed 2021 work plan was reviewed.

APR3 was convened in June 2021. It reported again on the supply chain mapping exercise to assist inform the scope of the RCDSF. In addition, in May 2021, an inaugural CDEC workshop was held virtually with the participation of all but three FFA members, PNAO, SPC, MPI, WWF Fiji, National Competent Authorities from Solomon Islands, Kiribati, Fiji, FSM and PNG and fishing industry association representatives from PNG, Fiji and Solomon Islands. This appears to be the first substantive participation of industry representatives in CDEC activities.

The workshop endorsed the tabling of the draft RCDSF to MCSWG24, urged staff to re-distribute the CDS survey (originally circulated in February 2020) to provide additional opportunities for members to respond, undertake additional one-on-one consultations including to learn of training needs, and review work to date in relation to CDS data standards (adversely impacted by the pandemic and constraints on regional travel). The requirement for outsourced IT expertise was again noted.

Following MCSWG24 consideration of the draft RCDSF in March 2021 it was presented to FFC118, as amended, in May where it was adopted (highlighted a milestone achievement). The APR recalled that, with the adoption of the RCDSF, a Communication Strategy could be developed and implemented. APR3 reported that draft ToR for the MTR were prepared in September 2020 and finalised in April 2021. It also drew attention to the desirability of an extension to the Activity to utilise funds that were yet to be drawn down to advance efforts to achieve Activity Outputs. No summary of SPC activities for the reporting period were included in the APR3 report.

The first CDEC workshop was convened virtually over three days in March 2021. The workshop was provided with an overview of the CDEC Activity, the RMCS Strategy and a summary of related activities supported by the Secretariat such as PEUMP. The evolution of the RCDSF was summarised noting that an initial draft was prepared in August 2019 during the technical consultation held between FFA and partners. It was revised in March 2020 as an outcome of internal technical consultation in FFA in February of 2020, and then it was further refined following discussions with the PNAO in February 2021.

The workshop also received a series of general presentations relating to the roles of States in international law and its significance to CDS, e-CDS linkages to traceability, a summary of a paper prepared by the EU on key data elements in import control schemes designed to deter IUU fishing, discussion on the supply chain mapping for FFA members consultancy that had been commissioned by the FFA Secretariat, a review of the FAO Voluntary Guidelines, the results of a questionnaire that had been circulated to FFA members in early 2020 to gauge needs and priorities relating to PSM and CDS, including the outcomes of one-on-one discussions which contributed to a national prioritisation analysis, a summary of the status of the RCDSF and a review of data and data systems integration to support PSM and CDS. At the time of the MTR, only daily notes summarising issues arising were available for review. A one-page summary of key outcomes, for tabling to MCSWG24, was also available. There was no consolidated summary report available to the MTR Team.

SC4 was convened in May 2021. No report for that meeting was available to the MTR Team.

3.4 External factors influencing progress

3.4.1 The WCPFC

Of direct relevance, and as background to the CDEC Activity, between 2013 and 2016, the FFA Secretariat committed significant resources to supporting the participation of FFA members in discussions in the Western and Central Pacific Fisheries Commission (WCPFC) relating to the development of a Commission CDS. In 2013, the 9th Regular Session of the Commission (WCPFC9) established a WCPFC CDS-Inter-sessional Working Group (CDS-IWG). The first CDS-IWG (CDS-IWG1) met immediately prior to the 10th Regular Session of the WCPFC Technical and Compliance Committee (TCC10) in September 2014. TCC10 endorsed the CDS-IWG1 Workplan for 2015 and recommended it to the Commission. CDS-IWG1 recommended that the Commission's CDS apply to the entire Convention Area, apply to purse seine, longline, pole and line and troll caught fish, and that it initially focusses on skipjack, yellowfin, bigeye, and albacore tunas (WCPFC-TCC10-2014-17).

The report of the CDS-IWG1 was presented to the annual meeting of the Commission in 2014 (WCPFC11-2014-IP05). The views of FFA members on a CDS for the Commission were summarised in a delegation paper prepared for the Commission (WCPFC-2014-CDSIWG-DP01). WCPFC12 in 2015 was presented with a report of a two-day session of the CDS-IWG2 prior to TCC11 (WCPFC12-2015-19c). The objective of a Commission CDS, proposed by the CDS-IWG2, was “to combat IUU fishing in the WCPFC-CA by providing a means of preventing fish and fish products identified as caught by or originating from IUU activities from moving through the commodity chain and ultimately entering markets” (WCPFC-TCC11-2015-21).

The Commission noted four broad groups of activities to be progressed by the CDS-IWG: the scope of work, a programme of intersessional work related to the development of CDS standards, mass balance reconciliation (with a trial agreed, with a 2013 calendar reference year), and CMM development. The last occasion that the WCPFC CDS-IWG met was in 2016. In that year, the Commission (WCPFC13) was advised that, since the work of the IWG commenced in 2014, CCMs had agreed on objectives and a considerable proportion of the scope for a WCPFC CDS. CDS-IWG3, which met over two days in advance of TCC12 in September 2016, focussed on draft standards as one of two streams of work identified for 2015/2016 (WCPFC-TCC12-2016-24_rev1). This was led by the FFA Secretariat (WCPFC13-2016-29).

At that year’s Commission meeting (WCPFC13), the EU expressed concern that CCMs were creating their own traceability systems which could end up being burdensome for CCMs (WCPFC13 Summary Report, para. 571). The EU was also concerned that discussions in the Commission could have implications, including cost implications, for global CDS used to supply EU markets that could not be entertained by the EU. The Commission agreed that the CDS-IWG would not meet in 2017 and that the FFA Secretariat would continue its work on draft CDS standards. The WCPFC CDS-IWG has not convened since. Although the motivating factor was unclear, the MTR was advised that the Secretariat plans to re-invigorate its efforts in relation to CDS standards in the near future.

Since WCPFC13 in 2016, except for efforts under the auspices of the Northern Committee to develop a CDS for Pacific bluefin tuna, CDS discussions in the Commission have stalled. The Commission’s CDS for tropical tunas was not mentioned in TCC17 (September 2021). It is uncertain what relationship will eventually be established between a CDS for Pacific bluefin and a Commission CDS for tropical tunas, but Northern Committee members have argued that the two are separate matters.

3.4.2 FAO Guidelines

In 2017, the Fortieth Session of the FAO Conference adopted *Voluntary Guidelines for Catch Documentation Schemes*. This resulted from a series of Technical and Expert Consultations supported by FAO across 2015 and 2016. The FAO Guidelines define CDS as “a system with the primary purpose of helping determine throughout the supply chain whether fish originate from catches taken consistent with applicable national, regional and international conservation and management measures, established in accordance with relevant international obligations”.

The Guidelines are presented in seven chapters and one annex. These cover Scope and Objective, Definition, Basic Principles, Application of Basic Principles, Cooperation and Notification, Recommended Functions and Standards, and Cooperation with and Recognition of the Special Requirements of Developing States. An annex includes Information Elements for Catch Certificate and

Additional Information along the Supply Chain. Several members of WCPFC's CDS-IWG have noted that the FAO Guidelines are generic and that the unique circumstances applying in the WPCO will require special consideration as WCPFC progresses development of Commission CDS.

3.4.3 Regional developments among FFA PIC members

Regional factors that may have impacted the implementation of the CDEC Activity include the fact that, several FFA members (including PNG, Solomon Islands, RMI, Fiji, and Kiribati) were advancing the development of national CDS prior to the CDEC implementation starting. The PNAO had developed a CDS module for FIMS but, generally, PNA members such as Solomon Islands, RMI and Kiribati were reported to not be utilising that service. Although there is some exchange of data between FIMS and RIMF at FFA (in relation to vessel registrations and VMS), FIMS is reportedly relative independent in relation to CDS needs.

3.4.4 Global certification schemes

Other key external factors relate to Marine Stewardship Council (MSC) certification. The MSC website lists 28 WCPO fisheries that are currently certified.¹⁴ As supply chain integrity is a key element in MSC certification, this has positive implications for CDS initiatives in the region. Demand for products with sustainability certification will continue to increase as large retailers commit to sustainable sourcing. This is stimulated to an extent by the active involvement of NGOs in supply chain and IUU research and investigations, the outcomes of which contribute to additional pressure on retailers and consumers to demand more information about the sustainability of harvesting practices for product presented to market.

The EU's 2008 IUU Fishing Regulation is also a significant external factor that has impacted initiatives in the region to deter IUU fishing and establish traceability schemes that minimise opportunities for IUU product to enter the supply chain. Six FFA PICs have been issued yellow cards, all of which have been lifted. They are Fiji (imposed Nov 2012/lifted Oct 2014), Kiribati (April 2016/Dec 2020), PNG (Jun 2014/Oct 2015), Solomon Islands (Dec 2014/Feb 2017), Tuvalu (Dec 2014/ Jul 2018), and Vanuatu (Nov 2012/Oct 2014). Technical support has been provided by FFA to assist these countries to meet EU's IUU Fishing Regulation requirements.

The process associated with lifting a yellow card includes a review of a country's fisheries legal framework; reform of fisheries control systems for vessels transshipping and landing in domestic ports; strengthening of MCS tools including requirements for port entry and port use; setting conditions for importing and exporting fishery products; strengthening administrative procedures; improving cooperation with flag States licensed to operate in a country's EEZ, and capacity building to deter IUU fishing.

In December 2020, Japan's Diet passed a new law setting out a series of implementation steps to ban import of IUU seafood. This will possibly be implemented before the end of 2022. The *Improvement of Domestic Trade of Specific Marine Animals and Plants Act* incorporates elements of the 2008 EU IUU Fishing Regulation and another recent development, the USA's 2018 Seafood Import Monitoring Program on IUU. The Japanese law seeks to block IUU seafood imports and includes the requirement

¹⁴ <https://fisheries.msc.org/en/fisheries/>

to transmit catch information for high IUU risk species throughout the supply chain. Import restrictions require a catch certificate issued by a foreign government agency.

3.4.5 Other initiatives

In addition, in 2018 leaders of three FFA members Australia, Fiji and Palau along with 11 other countries – Canada, Chile, Ghana, Indonesia, Jamaica, Japan, Kenya, Mexico, Namibia, Norway, and Portugal – committed to a series of pledges on ocean sustainability. The 'High Level Panel for a Sustainable Ocean Economy' (the 'Ocean Panel') members represent approximately 40 per cent of the world's coastlines and 30 per cent of global EEZ area.

The Ocean Panel's specific commitments are detailed for a range of sectors, with priority actions relating to achieving 'sustainable ocean food' including eliminating IUU fishing. This is to be addressed by incentivising the use of the latest innovations and technologies – such as digital traceability – to increase transparency; strengthening MCS; improving flag State control; effectively implementing the PSMA; and enabling enhancing collaboration among all stakeholders in supply chains. Initiatives such as these lend further support for the development of traceability systems and the potential role that the CDEC Activity can provide in this endeavour for FFA PIC members.

In relation to new technologies, the pandemic invigorated efforts to apply ER, EM, and artificial intelligence (AI) to enhance MCS in the face of severe reductions in human at-sea monitoring. In the longer term, these developments will be positive for CDS.

3.5 Internal factors impacting on progress

In addition to discussions with Activity staff in the FFA Secretariat, the APRs and the SC reports are useful sources of information regarding internal factors that have impacted CDEC Activity implementation.

3.5.1 National capacity to fully engage

The first APR1 (June 2019) reported that limited capacity in national administrations to absorb tasks associated with the CDEC and PIPSM posed an implementation risk. APR1 noted that consultations in relation to a CDS would require more time than had been anticipated internally across FFA, externally with partners in other agencies, and in the wider FFA membership. Activity staff considered that this was necessary to ensure that an e-CDS developed under the Activity was best suited to the FFA context, capability and capacity and was not administratively and financially burdensome. Limited national capacity, which is burdened with an expectation to engage in a complex and demanding regional agenda, may be one explanation for the relatively low level of engagement of members in the Activity to date particularly if, relative to other demands, CDS is currently a low priority.

3.5.2 FFA Secretariat capacity

APR1 reported that administrative work had been completed and that a tender process resulted in the initial contracting of four preferred suppliers (three covering MCS and policy and one MCS training) to support the Activity. The APR reported that the PIPSM Activity placed significant demands on

technical staff within the Agency but that the appointment of an Activity Administrative Assistant would provide some relief for those staff. Although it was suggested that additional expertise would be engaged for the Activity under contract, no further contracts have been awarded through to the time of the MTR (late 2021).

The APR reported that the initial focus of workplans would be based around Outputs 1 and 2 in 2018 and 2019. Because of the foundational work envisaged under Outputs 1 and 2 it was forecast that some activities under Outputs 3 and 4 would be delayed until 2019.

APR2 (April 2020) reported that timelines would need to be pushed back due to implementation delays including in relation to the recruitment of the CDS Technical Adviser. APR2 also reported that the development of a Communication Strategy was put on hold pending the adoption of the Regional Framework and noted that the recruitment of IT consultants to assist with the Activity was delayed pending the recruitment of the CDS Technical Adviser.

FFA Secretariat internal and external stakeholders reported poor internal coordination and collaboration among key interest groups within the Secretariat. For the CDEC, in addition to Corporate Services in relation to personnel and budget matters, internal engagement would be expected across the Legal Unit, Fisheries Operations (and IT) coordinated through the Fisheries Management Division, which is delegated responsibility for CDEC Activity implementation. The fact that poor collaborative arrangements have persisted since early inception stages of the Activity was a consequence of the absence of senior management/executive intervention to provide strategic direction.

Consequential impacts of the relative absence of strategic direction relate to reduced Secretariat capability to engage and motivate members on a critical issue of shared interest and to explore and test strategic options. As observed elsewhere in this MTR, this was compounded by significant workload across other work programme areas that has been sustained by the Secretariat over several years.

Additional internal factors that affected CDEC Activity implementation are the same as those that affected the PIPSM. They include staff turnover, delayed recruitment, and general administrative issues such as document management. In addition, other than through the TWG, which served as an internal information sharing and coordination forum for both the CDEC and the PIPSM Activities early in implementation, there is no evidence that the CDEC has, to date, made efforts to engage other FFA services in Activity implementation.

Although the CDEC primarily relies on SPC for IT-related support, and so does not have the same requirement as the PIPSM to access FFA's IT services, the CDEC could expect significant engagement with the FFA Secretariat's Operations Division, its IT Unit, and the Legal Unit. The Operations Division could expect to be engaged in respect of integration of the CDS to FFA's MCS services, particularly RIMF. The Legal Unit could be expected to provide the policy and legislative support under Output 3. There is limited evidence that this internal collaboration is occurring on a routine basis.

As has been the case for the other two MFAT-supported Activities, the normal disruption to services associated with staff recruitment and departure has been compounded by a massive workload across other work programme areas that has been sustained by the Secretariat over several years.

3.6 Managing, implementing, and governing

The CDEC and PIPSM Activities sit alongside core services, as opposed to being integrated with core functions, in the FFA Secretariat. In addition, there are structural challenges. Key staff are in Fisheries Management, but there are significant potential linkages to the Operations Division and Fisheries Development.

3.6.1 The Forum Fisheries Commission

Similar comments apply to the CDEC Activity as were identified by the MTR for the PIPSM Activity regarding the role of the FFC (See Section 2.7.1).

3.6.2 The Technical Working Group

Comments relating to the TWG for the PIPSM in the FFA Secretariat also apply to the CDEC Activity (See Section 2.7.2). The TWG offered an early opportunity to achieve integration and collaboration. However, the TWG lacked vision and strategic guidance and so the opportunities for strong internal networking and support were largely unachieved.

The MTR was informed that, in late 2021, the Secretariat completed a strategic mapping exercise alongside the new Strategic Plan, which, from reports, offers potential to achieve closer collaboration between Fisheries Management, Fisheries Development and Fisheries Operations. However, without executive engagement this endeavour could follow a similar fate as the TWG experienced.

3.6.3 The Steering Committee

The ADD envisaged the establishment of a Steering Committee (SC), as an advisory body, comprising FFA, MFAT, MPI and FFA members. The core purpose of the SC was to engage and inform members on the nature and progress of the Activity initiatives. In addition to budget monitoring, and advising on possibilities for collaboration and to avoid duplication with other related Activities in the region, the role of the SC, as described in the ADD, included to:

- provide direct oversight of activities under each Output against the approved annual work plan and budget
- confirm the monitoring arrangements that will be established regarding to the results framework, narrative and financial reporting templates, and systems. This will include an annual review of the RMT. This may lead to the amendments.
- take responsibility for considering and signing off on annual costed workplans and progress reports.

The first SC (November 2018) included representatives from six FFA members, MFAT and the FFA Secretariat. It primarily covered administrative matters relating to Activity implementation, work plans, a review of the RMT and the ToR for the SC. However, SC1 did record that limited capacity in national administrations to absorb tasks associated with the CDEC and PIPSM could have implications for implementation.

The report of SC2 (April 2019) records that the Secretariat advised the SC that implementation “was on track”. Plans for the first CDEC Workshop, opportunistic engagement with FFA members, the RMT and tasks supported under the PIPSM Activity that were relevant to the CDEC were the primary agenda items discussed. One FFA PIC member was represented together with MFAT and the FFA Secretariat. The report from SPC was presented under Output 4.

SC3 was convened in May 2020. The draft report for the meeting records that three FFA PIC members participated together with representatives of MPI, MFAT, SPC and the FFA Secretariat. In addition to reviewing the proposed work plan and the associated budget for 2021, SC3 noted that a regional CDS framework definition was endorsed at the FFC110 in May 2019, that the planned regional CDS workshop did not happen in 2019 but that an inter-agency workshop was held in August, and that the CDS TA was recruited in December. The relationship to the PIPSM Activity was again emphasised. The SC was provided with an overview of a Draft RCDS Framework.

SC3 also received a detailed report from SPC highlighting data collection and updating data collection tools initiatives supported by SPC’s component of the CDEC. Other related activities undertaken during the reporting period included building data collection applications and tools, updating current tools, refining the TUFMAN2 database as a web database for ease of system integration. Developments in relation to ER were summarised focusing on the *onboard* and *onshore apps*. SPC advised that the app. development took account of CDS requirements by adding features such as QR code scanning and future requirements for the generation of Catch Certificates.

SC4 met in April 2021. No report for the meeting was available to the MTR Team.

Two key features of the SC meeting reports are (i) two of the three reports available remain draft reports, and (ii) there is almost no discussion recorded in the meeting report. The reports primarily summarise the material that was presented to the meetings but do not indicate whether that material generated discussion.

In addition, there is little indication that the SC made decisions based on presentations, as provided for in the SC ToR included in the ADD, nor provided strategic advice to assist with the effective implementation of the Activity. There is also no indication of the fate of the reports, how draft reports were to be finalised, within what timeframe, and how final reports would be distributed to the FFA membership. The MTR notes that SC1 advised that it would endeavour to circulate the minutes for its meetings two weeks after the meeting. The draft report for SC4 still had not been distributed to SC participants six months after its April 2021 meeting.

3.6.4 Monitoring and evaluation

It was anticipated that FFA and SPC would have an important role in results monitoring and reporting with an expectation each would commit time and resources to undertake monitoring tasks *using an agreed methodology*. FFA members and their officials and stakeholders, i.e., not just the Agency, were also expected to contribute to monitoring activities.

The ADD provided an RMT with indicators and targets and the methodology for collecting data. The ADD noted that monitoring and reporting systems relevant to the CDEC Activity had been operational in the region for some time (e.g., log-sheet catch and effort data systems, VMS, regional fisheries observer programmes) and that the CDEC would build on this foundation. Consequently, the ADD

advised caution in describing baselines so the specific work supported under the CDEC Activity could be identified.

The ADD proposed that additional baseline information be confirmed and/or collected and incorporated in the Activity's Results Framework. The adoption of the Results Monitoring Table (RMT) by the Implementation Steering Committee was considered an important step towards greater "buy-in". The ADD also advised that adequate resources were required to effectively support monitoring and annual reporting of these indicators and targets. It was also noted that FFA and SPC would have staff dedicated to gathering RMT-related information (i.e., through funds in the Activity budget).

For the CDEC Activity, the ADD anticipated that, under the Direction of the Divisional leadership within FFA, the CDS Technical Adviser and Activity Administration Assistant, monitoring systems and reporting tasks would be implemented. The ADD noted that "without accurate and consistent approaches to the monitoring, assessment and reporting of trends and progress, it would not be possible to make meaningful, evidence-based decisions". It is not evident that the inception meeting reviewed the RMT and its associated indicators and targets but SC1 (November 2018) reported that the RMT would be revised for consideration by the SC at its second meeting.

In March 2020, the Activity Administration Officer met with the MFAT Development Manager and Senior Adviser for M&E to review the RMT. APR2 reported that this meeting resulted in amendments to the Indicator, Target, and Methodology components. Although this led to a revised RMT, the MTE was unable to verify that key stakeholders in FFA member PICs were aware of these changes nor of the implications for implementation of the CDEC.

There is limited evidence that the RMT is used for strategic monitoring of Activity implementation and the assessment of outputs. The MTR recommends that Activity management formally review the RMT so that it becomes an integral part of Activity M&E. If the appropriate support is not available in the FFA Secretariat to undertake this, SPC could be approached for assistance.

3.7 How cost-effective is the approach employed to deliver results?

The implementation arrangements described in the ADD were sound. The Activity was designed to benefit from FFA's and SPC's long-established regional institutional roles servicing policy and technical priority fisheries issues in partnership with their FFA PIC members. This implementation approach drew on the unparalleled experience of those two organisations in WCPO fisheries and the institutional arrangements supporting them. In this regard the design proposed the most cost-effective means to achieve the Outcomes desired.

The CDEC ADD also anticipated high levels of engagement with the PNAO. FFA has endeavoured to facilitate the participation of PNAO representatives, in addition to representatives from PNA members, in numerous CDEC-supported meetings including the inter-agency meeting in August 2019 and the CDECW1 in 2021. In addition, FFA staff report occasional consultations with PNAO staff particularly in the process of developing the RCDSF. While conscious of the need for equitable opportunities for all FFA members to contribute to CDEC activities, implementation efficiency, and thus value for money,

will likely be optimised through continued active engagement with the PNAO on CDEC Activity implementation.

SPC has integrated the work associated with the CDEC to other key streams of work it is responsible for related to data and information management. With limited strategic direction from either the FFA Secretariat or FFA members, SPC OFP is producing useful outputs of direct relevance to a future CDS.

However, for the FFA-implemented components, numerous factors have meant that implementation progress has been slow with the result questions arise regarding whether the actual implementation approach for the CDEC is providing value for money. The key factor influencing this is slow progress implementing the complementary PIPSM Activity, which was intended to provide a foundation for many of the tasks supported under the CDEC. Two key factors contribute to this:

- weak engagement with FFA PIC members, including industry associations, through virtual means
- inadequate strategic direction and leadership from within the FFA Secretariat.

The CDEC is a time-bound initiative. It was originally scheduled to be implemented over five years, commencing in July 2018 and concluding in October 2023. Approximately 17 per cent of the total CDEC budget was committed to the end of 2020 (see Appendix B). Funds remaining in the CDEC Activity budget (approximately NZ\$4 million) are unlikely to be fully utilised at the time of the scheduled conclusion of the Activity in October 2023.

FFA members should be encouraged to take advantage of the opportunities the CDEC presents. To maximise the potential benefits to regional and national CDS this opportunity provides, the MTR recommends that, subject to the preparation of a practical and realistic implementation plan, and commitments by the FFA Secretariat in regarding to strengthening policy and technical support to the Activity, a no-cost extension to October 2024 be considered.

3.7.1 Status and outlook for CDS in the Region

The current significance of CDS to FFA members as a block is not clear. Some (for example PNG, Solomon Islands, Fiji, RMI and Kiribati) have made, or are making, progress with CDS-related activities. These efforts are not driven by an approach that integrates CDS to fisheries management schemes where CDS can provide a supplementary monitoring source to support catch verification and auditing. For the nine PNA countries managing by effort under the PNA LL VDS, a CDS is not of the same value, for fisheries management purposes, as it could be under a catch management arrangement.

PNG is reported to have assigned a multimillion-kina annual budget, and more than 20 staff, to a Catch Document Unit that is responsible for collecting data from vessels in port and from processors to document and verify data against vessel e-logs. This services the national rebate scheme with the national FIMS incorporating significant CDS capability that includes transshipment and unloading information. PNG's system is reportedly not currently linked to formal export system, but discussions have been underway for some time with PNG Customs to link PNG FIMS to Customs data systems.

In the longer term, premium markets will require higher levels of verification of product. Integrated monitoring will be far more sophisticated to provide the accountability demanded by market States and CDS will be a key component.

3.8 Options for improving implementation of the CDEC

3.8.1 Strengthen management, implementation, and governance

The Activity requires increased engagement and strategic oversight by management in the FFA Secretariat.

The CDEC and PIPSM Activities sit alongside core functions, as opposed to being integrated with core functions, in the FFA Secretariat. In addition, there are structural challenges. Key staff are in Fisheries Management but there are significant potential linkages to the Operations Division.

Poor collaborative arrangements across the FFA Secretariat are reported to have persisted since early inception stages of the Activity. The cause of this is generally ascribed to limited senior management/executive intervention regarding strategic direction.

Consequential impacts of the relative absence of strategic direction relate to reduced Secretariat capability to engage and motivate members on a critical issue of shared interest and to explore and test strategic options.

3.8.2 Reinvigorate the Technical Working Group

The TWG should be formally re-established with the oversight and direction of executive management. The TWG should engage policy and technical staff across the Secretariat's Divisions, set a regular (at least monthly) meeting schedule, agree to tasks, roles, and responsibilities, and hold colleagues to account in terms of expectations.

3.8.3 Strengthen Activity management

Activity administration requires strengthening. This relates to Activity planning, stakeholder engagement, resource mobilisation and allocation, monitoring and reporting, records management, Activity communications, Activity partnerships, meeting management, and monitoring and evaluation.

There is limited evidence that the RMT is used for strategic monitoring of Activity implementation and the assessment of outputs. The MTR recommends that Activity management formally review the RMT so that it becomes an integral part of Activity M&E. If the appropriate support is not available in the FFA Secretariat to undertake this, SPC should be approached for assistance.

Two key features of the SC meeting reports are (i) two of the three reports available remain draft reports, and (ii) there is almost no discussion recorded in the meeting report. The reports primarily summarise the material that was presented to the meetings but do not indicate whether that material generated discussion or strategic advice to assist with the effective implementation of the Activity.

There is also no indication of the fate of the reports, how draft reports were to be finalised, within what timeframe, and how final reports would be distributed to the FFA membership.

As discussed elsewhere in this MTR, meeting management, including preparations and outcome reporting, needs significant strengthening. Document management, including version control and archiving, requires attention.

The MTE recommends that staff receive training in basic principles of Activity administration. This should include (i) meeting preparation and management, and (ii) document management.

3.8.4 Increase technical support to the Activity

Additional staff with professional MCS experience, particularly with experience in CDS, and multilateral fisheries management need to be assigned to the Activity to provide support to the CDS Technical Adviser. Such expertise could be sourced by dedicating additional FMA resources to the Activity. If that expertise is not available in FFA then external expertise should be secured under contract.

In addition, in relation to Output 3, based on a firm work programme, arrangements should be secured from the Legal Unit for backstopping and support. If the workload of the Legal Unit prohibits this, then the appropriate legal support should be contracted under joint supervision of the Legal Unit and CDEC management. Locally-based national consultants potentially offer a valuable resource in this regard.

3.8.5 Refresh the Implementation Plan

When the CDEC and PIPSM Activities were conceived there was a strong sense that a regional approach would be of broad benefit and that the outcomes would apply to all FFA Members. In the early stages of working towards this, it became apparent that countries are at different stages in considering both PSM and CDS and needs and priorities were not necessarily shared by all Members. The results are Regional Frameworks that are, in effect, guidelines, which are non-prescriptive and open to interpretation. The initial assumptions and drivers were not borne out by what Members wanted when it came to implementation. Also, there remains a lot of debate about the actual purpose of a CDS.

The outcomes of the Brisbane workshop provided sound advice for a programme of work for support under the CDEC. Most of that work remains unattended to. It is recommended that a revised Implementation Plan:

- incorporate development of a CDS Activity Communications Strategy
- complete more detailed analysis of national supply chains for FFA Members' tuna products as country visits permit
- commission a fresh discussion paper to inform members consideration of national, sub-regional and regional e-CDS, as proposed by the Brisbane Workshop
- commission an analysis of the potential costs to FFA Members of a regional e-CDS compared to nationally implemented e-CDS and assesses these against the benefits. Include a discussion of the short- and long-term resourcing implications, and the potential for cost recovery.
- support the development and implementation of national and regional e-CDS through laws, regulations, licensing, agreements, contracts, etc, regulating fishing, fish processing and fish trading operators.

3.8.6 Finalise ToR and commission a business case for a CMS

The work anticipated through the development of a business case for the development of the catch management scheme (CMS) is still of potential value to FFA members. The overall purpose was to document the technical requirements, definitions, and specifications to support the design and development of a national catch accounting module (CAM) within a regional CMS system which was anticipated to be a first significant step towards the successful implementation of the CMS.

As this assignment still has potential to be of significant national and regional benefit for FFA PICs engaged in the southern longline fishery, the MTR recommends it be resurrected by FFA and SPC, the ToR reviewed and agreed, and the drafting of a business case be commissioned.

3.8.7 Strengthen relationship to the PIPSM Activity

The CDEC ADD acknowledged close linkages to the PIPSM Activity. However, this was not elaborated upon in the Implementation Plan that was the outcome of an undated two-day inception meeting for the CDEC convened in Honiara in 2018 and that involved FFA, SPC and MPI staff. The purpose of the meeting was to consider priority actions for the first year of the CDEC Activity.

It was the consensus of the meeting that the initial focus of the Activity should be on regional work leading to the planned development of a Regional CDS Framework. National work would follow on the basis that mapping and scoping of national work was dependent on the structure of the Regional CDS Framework. The Implementation Plan provided that members that were already developing their national CDS would continue in that endeavour concurrently.

The CDEC ADD's relevance would have been strengthened if the Activity's purpose was integrally linked to management arrangements for specific fisheries. This would be achieved by supporting integrated systems that incorporate vessel details, vessel logbook reporting, landings data, processing and export data and VMS data. This was advocated during early discussions on the purpose of a CDS in the WCPFC where FFA members advocated a bottom-up approach to CDS development including to, *inter alia*:

- reflect the broader fisheries management regime and fisheries management goals
- be compatible with and support existing national and sub-regional e-CDS initiatives
- adopt a standards-based approach that supports greater incorporation of national and sub-regional priorities
- offer the ability to incorporate the different fisheries management objectives of FFA Members and sub-regional groups
- integrate and build on national tools
- prioritise inter-operability.

The MTR recommends that the CDEC Activity develop an Implementation Plan to serve the remainder of Activity implementation that incorporates the principles outlined above as key elements of future CDEC work.

Communications and awareness raising

The ADD identified the need for a Communication Strategy under Output 4. This was to promote the Objectives and the expected Outputs of the Activity, particularly in relation to capacity building, and to inform relevant stakeholders regarding the support available through the Activity. The inter-agency workshop in Brisbane in August 2019 confirmed the need for a Communications Strategy or Plan to support the Activity. This had not been actioned at the time of the MTR.

The MTR recommends that a formal Communication Plan be prepared, resourced, and implemented for the remainder of the Activity.

Fast track development of SPC's e-CDS support tools

It is recommended that SPC be supported to fast track the further development of its e-CDS support tools. Opportunities to engage with FFA Secretariat's IT should be provided in relation to this, particularly in relation to linkages to RIMF, but these engagement efforts should not constrain SPC's progress in addressing this need.

SPC should be invited to prepare a programme of work, with associated budget, for consideration under the CDEC Activity to support this action. In developing this support, SPC should, to the extent possible, and without compromising system functionality for all FFA members, thoroughly research opportunities for synergies with PNA FIMS and national e-CDS systems such as in PNG.

Most of the information required to support a CDS is already in TUFMAN2. Some refinements may be required, including to modify requirements of log sheets, and DCC Standards would need to be updated.

Of relevance to both the SPLL and CDEC Activities, SPC has invested resources in developing a catch visualisation application that demonstrates potential for deployment to national fisheries administrations. The application will strengthen catch monitoring capacity, particularly as ER is rolled out in the region, track catches as they approach catch or effort limits and inform FFA fisheries managers on the impacts of different levels of catch on Catch Per Unit Effort. Strengthened monitoring for regional longline fisheries is important as, unlike purse seine fisheries, they support very low levels of at-sea human observer coverage to (i) verify catch, and (ii) in relation to administrative arrangements, verify claims such as non-fishing days.

SPC has also started work developing a module to summarise national catch export destination information. Linking the two modules will provide FFA PIC members with improved capacity to reconcile and verify key information from point of harvest to export.

In summary, SPC is working to ensure that TUFMAN2 is ready to support CDS. The concept has been technical proven to track individual fish through a combination of ER, blockchain (using funding from another SPC programme), QR tags, and bar codes that can feed into regional or national CDS systems with appropriate data sharing rules (such as provided for under the WCPFC data access rules, the NTSA and some bilateral MoUs between SPC and countries).

These developments are candidates for the use of additional funds that the MTR recommends is transferred to SPC under the SPLL Activity.

Select two or three countries to pilot Activity initiatives

The CDEC Activity could identify two or three FFA PIC members who have demonstrated a keen interest in engaging in the Activity to provide the platform for Activity implementation.

3.8.8 Inter-Activity synergies

The ADD noted potential synergies between the three Activities funded by MFAT and implemented by the FFA Secretariat. The linkages between the PIPSM and the CDEC Activities are particularly strong with much of the work programmed for support under the PIPSM serving as foundational for the CDEC. A baseline review of national systems applicable to PSM and CDS was completed in 2018 with funding support from the PIPSM Activity.¹⁵ At the time of the MTR, four years into the implementation of both Activities, it remains to be demonstrated how the synergies between these Activities will be achieved. In addition, a status review of implementation progress for CDS at the national level will be beneficial, as activities are mapped out for the remainder of the Activity,

3.8.9 Financial considerations

The CDEC is a time bound initiative. It was originally scheduled to be implemented over five years commencing in July 2018 and concluding in October 2023. Approximately 17 per cent of the total CDEC budget was committed to the end of 2020 (see Appendix B). Funds remaining in the CDEC Activity budget (approximately NZ\$4 million) are unlikely to be fully utilised at the time of the scheduled conclusion of the Activity in October 2023.

FFA members should be encouraged to take advantage of the opportunities the CDEC presents. To maximise the potential benefits to regional and national CDS this opportunity provides, the MTR recommends that, subject to the preparation of a practical and realistic Implementation Plan, and commitments by the FFA Secretariat in regarding to strengthening policy and technical support to the Activity, a no-cost extension to October 2024 be considered.

¹⁵ Blaha, F. and Johnson, D. 2018. FFA PSM Consultancy. Task #1&2. *Port Activities Study and Framework for effective PSM in FFA's membership*. Final Draft Report. 59 pages.

4. South Pacific Longline Policy and Management

4.1 Background context

4.1.1 The Tokelau Arrangement

The South Pacific Long Line (SPLL) Activity was designed to support the Tokelau Arrangement for the Management of the South Pacific Albacore Fishery (TKA), signed by 11 participating FFA Members (Australia, New Zealand and nine Pacific Island Countries (PICs) in 2014. The objective of the TKA is to promote optimal utilisation, conservation, and management of the South Pacific albacore resource, whether targeted or taken as by-catch. This is to be achieved through *inter alia*, maximising economic opportunities by supporting the development of domestic and locally based fishing industries, securing an equitable share of fishing opportunities and equitable participation in fisheries for these resources and increasing control of the fishery for the Participants.

The Arrangement provides for the regulation of fishing catch and/or effort and mitigation of by-catch by fishing vessels operating within the Scope of the Arrangement, the implementation of a harvest strategy, including consideration of precautionary target and limit reference points, indicators, and harvest control rules for any fish stock under the Scope of the Arrangement, if not already regionally agreed.

It also provides for the definition of catch allocation units, the determination of zone limits and inter-zone trading mechanisms (such Catch Management Arrangements (CMA)), and the establishment of cooperative measures to restore or add local value to the fishery through mechanisms such as the use of allocation units, including as equity in joint ventures, allocation unit pooling and multi-zone access schemes, sub-regional agreements on minimum licensing fees, and sub-regionally applied standards for licenced foreign vessels to land a proportion of catch at designated ports, or to employ a proportion of local crew and officers. It also provides for associate participation by non-FFA member States of Territories which have an exclusive economic zone (EEZ) overlapping the effective range of the stocks covered by the Arrangement.

Full implementation of the Arrangement was challenged by the fact that the interim catch limits agreed at TKA1 in 2014 were, for most participants, aspirational. At the sixth meeting of the TKA in October 2017 (TKA6), after considerable investment in time and effort, the proposal to develop a CMA was suspended. There were several reasons for this. It was reported that New Zealand argued strongly for elevated catch quotas and this, in combination with other concerns for TKA members that were also members of the PNA Longline Vessel Day Scheme (LL VDS), resulted in the withdrawal of Solomon Islands from efforts to develop a CMA and for the initiative to be placed on indefinite hold.¹⁶ As three members of the TKA were also members of the PNA (Solomon Islands, Tokelau and Tuvalu), there was concern regarding the potential burden of supporting two systems to serve essentially the

¹⁶ See Solomon Islands Statement appended to the Draft Report of the Sixth meeting of the TKA, 25-26 October 2017, Honiara, Solomon Islands.

same purpose.¹⁷ The Cook Islands which, in 2016, legislated a quota management system for its large pelagic fishery which established a national total allowable longline catch for albacore and bigeye tuna, also withdrew from the CMA negotiations.¹⁸ The lack of agreement of a workable CMA for the southern tuna longline fishery was identified as a possible risk in the ADD.

As the development of a CMA was a central activity supported under the SPLL, the 2017 decision had a significant impact on SPLL Activity activities.

4.1.2 The PNA Longline Vessel Day Scheme

The PNA LL VDS came into effect in 2014 under the Palau Arrangement. The LL VDS is a management scheme covering the tropical longline fishery targeting bigeye and yellowfin. The LL VDS establishes a total allowable effort (TAE) for fishing in all parties' waters, which is then allocated amongst the parties as party allowable effort (PAE). Following a trial period of several years, the LL VDS was formally implemented on 1st January 2017. Part of the motivation for the development of the LL VDS was to provide a mechanism to enhance security of rights not available to PNA members through flag-based limits and to respond to criticism of Small Island developing State (SIDS) exemptions from longline bigeye limits both in-zone and on the high seas provided for in the WCPFC's tropical tuna and related conservation and management measures (Campling and Hetherington, 2021).

4.1.3 The SPLL Activity design

The SPLL Activity Design Document (ADD) acknowledged that the process of implementation of the Activity would depend on national management systems and future national requirements, and was likely to be different among participants, ranging from a simple licence cap that restricted the total possible albacore catch within the EEZ to less than the national limit, through to Quota Management Systems. The ADD acknowledged that the TKA had the potential to expand to include other species of tuna and to other FFA PIC members or non-FFA member territories, by association. The ADD records the goal of the Activity is "increased economic and food security benefits from a sustainable South Pacific albacore fishery".

The original ADD provided for five Outputs, each comprising subsidiary outputs or tasks:

- Output 1: Scientific information and advice provided to inform improved management of South Pacific albacore.
- Output 2: Regional Catch Management Scheme developed, agreed, and aligned with the WCPFC harvest strategy.

¹⁷ The PNA LL-VDS which, since full implementation in 2020, covers all tuna longline fisheries in participant EEZs (Federated States of Micronesia, Kiribati, Marshall Islands, Nauru, Palau, Papua New Guinea, Solomon Islands, Tokelau, and Tuvalu) which account for significant amounts of SPA. While membership overlaps with TKA (Solomon Islands, Tokelau, and Tuvalu) it does not currently include all the EEZs supporting longline fisheries that take SPA. In addition, a South Pacific Group (SPG) of six non-PNA FFA members (Cook Islands, Fiji, Niue, Samoa, Tonga, and Vanuatu) have drafted a Memorandum of Understanding (MoU) to promote their shared interests and cooperation in longline fisheries management and development, purse-seine fisheries management, and shared interest in skipjack fishery; and exploring shared services in support of fisheries management.

¹⁸ Cook Islands Marine Resources (Large Pelagic Longline Fishery and Quota Management System) Regulation 2016 and its Schedule 4, Large Pelagic Longline Fishery Plan.

- Output 3: TKA Participants assisted to review and develop national fishery policy(s) and regulatory frameworks to implement TKA commitments.
- Output 4: Systems to support the Catch Management Scheme developed and rolled out.
- Output 5: Capacity development provided to TKA Participants to implement sub-regional obligations and maximise national benefits.

In February 2017, the New Zealand Ministry of Foreign Affairs and Trade (MFAT) signed a Grant Funding Arrangement (GFA) with the FFA for implementation of the Activity, in collaboration with SPC.

Partly in response to the impasse within the TKA regarding collaborative management arrangements for the southern longline fishery, and the fact that several equatorial FFA PICs took significant amounts of albacore as by-catch in longline fisheries targeting yellowfin and bigeye tuna, the FFA Secretariat initiated discussions on broader collaborative arrangements covering longline fisheries in all FFA members for all principal target species. Subsequently, at FFC116 in 2016, FFA members adopted a Regional Longline Strategy¹⁹ (RLLS) for longline fisheries in Western and Central Pacific tropical and subtropical waters between 20°N and 30°S excluding fisheries targeting bluefin tuna. This was supplemented by a supporting Action Plan adopted in 2019.

Noting the five-year timeframe that was assigned to the SPLL Activity and the considerable Activity resources that had been invested in developing options for the CMA, these developments had significant implications for the achievement of original ADD outputs and outcomes. The Second Steering Committee in May 2018 acknowledged that there was a need to re-design Outputs 2, 3 and 4 of the SPLL.

While discussions on the CMA had dominated TKA discussions through 2017, SPC, with funding support under Outputs 1, 2 and 4, had continued to provide FFA members (including TKA meetings) with a comprehensive range of scientific and data services associated with SPA longline fisheries consistent with expectations of the ADD. In addition to data management and data interpretation advice, SPC continued to provide:

- scientific advice relating to trends and indicators for the SPA stock
- rebuilding projections to achieve the interim Target Reference Point (iTRP), including implications for individual countries
- support to management procedure development including Harvest Control Rule (HCR) discussions
- analysis of allocation options and the development of prototype applications for catch visualisation and catch monitoring/accounting²⁰ building in provisions for electronic

¹⁹ Developed primarily with funding support from the GEF-OFMPIO.

²⁰ In May 2018, TKA members met with the FFA Secretariat in Cook Islands to consider options for improving the design of the SPLL Activity. FFA Secretariat reported to that meeting that, during 2018, FFA and SPC collaborated on the drafting of ToR for a business analyst to review existing regional and national systems to monitor and verify catch of longline fishing vessels taking SPA. The ToR also described work associated with mapping catch monitoring and reporting requirements including the development of conceptual models, schema, and technical specifications for a CMA together with associated business rules. FFA Secretariat reported to the same meeting that it proposed contracting a legal specialist to undertake a desk-top review of policies, legislation and regulations applied by individual TKA members to form a basis for the preparation of a regulatory framework for a catch-based management system. The FFA Secretariat also advised the meeting that it planned to undertake an

reporting (ER) (*On-board* and *On-shore* applications and compatible developments to TUFMAN2)

- scientific advice to individual countries relating to zone-based management (e.g., Tonga,) and fishery characterisation (e.g., Solomon Islands)
- oceanographic impacts on regional longline fisheries
- capacity building in stock assessment in relation to Output 5.

SPC has also undertaken some preliminary work, in collaboration with FFA, relating to the value of the catch for target species in longline fisheries in the Pacific Island Country Territories (PICTs) EEZs.²¹ SPC reported in 2020 that the scope of this work would not have been possible without the support of the SPL Activity (SC3 Report, 2020).

Without the need to revise the original GFA,²² the FFA Secretariat revised the original ADD to reflect the priorities and actions associated with the RLLS, maintaining support for the strengthening of subregional zone-based management of the southern longline fishery with its primary target of albacore tuna and the tropical longline fishery with its primary targets of yellowfin or bigeye tuna. It was intended to continue to assist southern FFA members to urgently explore collaborative management mechanisms and assist equatorial FFA members to bring their LL VDS into full operation while promoting better management of high seas longline fisheries through WCPFC.

The revised Activity maintained support for SPC's scientific services under Output 1, provided targeted support for sub-regional zone-based management arrangements for all longline fisheries (Output 2), including in relation to work on TRPs and HCRs (Output 3), the revision and strengthening of national policies and legislation to support management of longline fisheries (Output 4) while maintaining support for capacity building (Output 5). The revised Outputs were:

- Output 1. Scientific information and advice provided to inform improved management of Pacific Island longline target stocks.
- Output 2. Regional Longline Fishery Management Frameworks developed to drive the proper management of Longline Fisheries in the WCPO.
- Output 3. Subregional management systems supported and strengthened in compatibility with agreed South Pacific Albacore Target Reference Point and the tropical longline harvest strategies.
- Output 4. FFA island members assisted to review and strengthen national fisheries policies, frameworks, and systems to implement regionally agreed Longline Fisheries Management systems.
- Output 5. Capacity development support provided to FFA island members to implement sub-regional longline management obligations and maximise national benefits.

assessment of gaps and capacity building needs in relation to catch-based management and that the ToR for this work would be developed in consultation with FFA's Training Officer.

²¹ Skirtun, M., Pilling, G.M., Reid, C. and Hampton, J. 2019. Trade-offs for the southern longline fishery in achieving a candidate South Pacific albacore target reference point. *Marine Policy*. 100 (2019), 66-75.

²² Appreciation for MFAT's flexibility in terms of accommodating changes proposed because of the changed implementing environment was recorded in the third Steering Committee meeting in May 2020.

As with the other two Activities, governance for the Activity resided with the Forum Fisheries Committee (FFC). An Implementation Steering Committee (comprising FFA, SPC, MFAT relevant agencies and representatives of TKA participants) and a TWG involved with day-to-day management of the Activity, were also established.

The ADD envisaged that FFA, as the Administrator of the TKA, would host a TKA Secretariat. The Activity funded a TKA Coordinator based in FFA's Fisheries Management Division at the FFA Secretariat in Honiara. This position was vacated in 2019 and the role of TKA Administrator, while remaining with the FFA Secretariat, has not been filled.

While the SPLL has the technical capacity to support the development and application of policy and management support to longline fisheries in FFA members, the financing of the drafting and development of the RLLS was primarily supported from FFA core funding and the GEF OFMPII. SPLL support to the RLLS development included the funding of facilitation support for a workshop and development of the associated Action Plan in 2019.

Stakeholders consulted during the MTR were generally of the view that this support is appreciated and valued. However, they also considered that support for longline fisheries management should be embedded in the FFA Secretariat's core work programme rather than devolved to an Activity. They considered that the current Strategic Plan required strengthening to reflect this core service.

4.2 Key findings

4.2.1 Is SPLL relevant?

The SPLL Activity is highly relevant. It provides a substantial increase in resources to apply to strengthening management arrangements for SPA – an issue that has been a priority for FFA PIC members for almost 30 years and represents one of the most challenging fishery management arrangements facing the region. Its original design in 2016 was appropriate and, given the developments in relation to a CMA, and discussions that are on-going in the Western and Central Pacific Fisheries Commission (WCPFC), the re-designed Activity, incorporating significant support for key elements of the RLLS, remains relevant.

This is supported in numerous key regional policy documents which, apart from the Regional Roadmap for Sustainable Pacific Fisheries and the RLLS and its complementary Action Plan, include FFA's Strategic Plan (2005-2020), its successor Strategic Plan (2020-2025), and FFA's Regional 2018-2023 MCS Strategy. In the WCPFC, Conservation and Management Measure (CMM) 2015-02, which relates to reporting, cooperation and limits on vessel numbers targeting SPA, and WCPFC's South Pacific Albacore Roadmap Inter-sessional Working Group, which is tasked with developing strategies to implement sustainable conservation and management arrangements for SPA, are relevant. It also supports the objectives of the TKA and the principles for cooperation described in the draft MoU for the South Pacific Group (SPG).

The adoption of an iTRP for the entire Western Central Pacific Ocean (WCPO) South Pacific albacore stock at WCPFC provides the basis for priority work on the development of HCR and on allocation including for the high seas and zones under national jurisdiction.

The recent re-assessment of the TRP undertaken by SPC for WCPFC18 in December 2021 (SPC, 2021) has significant implications for the prospects for developing agreed management arrangements for SPA. It serves to underscore the relevance of the SPLL given the medium to long-term economic implications for FFA members supporting significant albacore fisheries if there is no change to the *status quo*.

4.2.2 Is SPLL's design fit for purpose?

The design of the Activity was fit for purpose at the time it was formulated in 2016. This was supported in several key stakeholders' interviews. With the refinements undertaken by the FFA Secretariat in 2018 in response to the shelving of the CMA at TKA6 in October 2017, the SPLL now has broader FFA regional application than the original focus on SPA and TKA participants.

The FFA Secretariat's revision of the ADD in 2018 focussed on Outputs. The short-, medium- and long-term Outcomes remained unchanged. The re-design is appropriate in terms of providing a useful platform to support strengthened national and regional arrangements for the management of SPA specified as short- and medium-term Outcomes of the SPLL Activity. However, the broadening of SPLL activities to incorporate longline fishing in all FFA members, consistent with the RLLS, is not reflected in the medium- and long-term Outcomes of the revised Activity. Similarly, the targets and indicators, at least in the versions available to the MTR, have not been revised and almost exclusively reference SPA. Moving forward, this will need to be addressed.

The design may provide a solid platform for addressing medium- and long-term Outcomes. However, unless governance arrangements provide the required opportunities for strategic guidance and engagement, and appropriate expertise is assigned to the Activity's initiatives (both in partner agencies, at SPC and FFA, and at the national level), these Outcomes will be severely compromised. In addition to these risks, the ADD noted potential risks and challenges associated with coordinating multiple work streams from different groups e.g., TKA, VDS, PNA and, at that time, the TVM,²³ which require strong collaboration and communication.

The extent that these risks have materialised is difficult to gauge. It was reported to the MTR by non-PNA FFA members that there was a perception that the FFA Secretariat assigns a disproportionate level of support to the PNA, at the expense of non-PNA members. The extent this occurs across the FFA work programme was beyond the scope of this MTR to assess. However, regarding the SPLL Activity, there is no evidence that, with five months remaining for the SPLL under current implementation arrangements, PNA members have been actively engaged in SPLL activities as provided for in Output 2, 3 and 4.

²³ The Te Vaka Moana Arrangement (TVMA) was signed by the heads of the fisheries administrations of the Cook Islands, New Zealand, Niue, Samoa, Tokelau, and Tonga in January 2010. The objective for the TVMA was to "secure, protect and enhance long-term economic benefits able to be derived from Polynesian fisheries and protect their important contribution to food security of the communities". The TVMA was financially supported by MFAT until recently when funds on hand at FFA were distributed to participating countries to support national activities. Its last meeting was in 2018 when it was noted that the Coordinator role expired in August 2017 and was not renewed.

4.3 What progress is being made?

The FFA Secretariat has provided useful analysis of options available to its members for SPA. Extensive modelling was undertaken in support of the CMA discussions and some work to review national policy and tuna management plans has been supported. The Secretariat has attempted to support discussion of potential management arrangements since discussions on the CMA was discontinued but achieving consensus on mutually beneficial strategy has proven elusive.

SPC has also provided substantial information and advice to FFA members relating to the status of the SPA resource, the fisheries that harvest SPA and biological and economic issues associated with the assessment of options for high-seas and zone-based management. These primarily relate to Outputs 1 and 3. In addition, although no baseline is available, national capacity to engage in regional discussions concerning longline fisheries management has conceivably improved in the three years since the SPLL was re-designed.

This is not the result of formal training or capacity building initiatives under Output 5 of the SPLL but is more an outcome of regular exposure to sub-regional and regional discussions dedicated to longline fisheries management and scientific presentations relating to the status of the SPA resource at the national level, in FFA fora or as participants in WCPFC processes. Unfortunately, there is no metric against which to validate this observation.

4.3.1 Game theory analysis received mixed feedback but is worth pursuing

Regarding Outputs 2 and 3, the 2019 Annual Progress Report (APR) reported that game theory analysis, a collaboration between FFA, SPC and the Environmental Defence Fund (EDF), was incorporated into Activity initiatives following the TKA6 meeting in October 2017. TKA6 was advised that game theory suggested that benefits that could accrue to a coalition was dependent on broad engagement. The model used demonstrated that cooperation was more productive than no collaborative action at all. This motivated the FFA Secretariat to support further investigation and analysis.

The 2019 APR reported limited progress with this initiative during 2018-2019 partly because the game theory work was predicated on a CMA being agreed. The EDF consultant's presentation to the October 2021 SPA Workshop (SPA-3) was constrained because of the late availability of the discussion document and it would require more detailed consideration at a future meeting.

The MTR received mixed feedback on the game theory initiative from meeting participants. Some stakeholders are concerned that the exercise, while interesting, is largely academic. Others consider that, given that stakeholders have been struggling for many years to find a way forward on South Pacific albacore management arrangements, anything that has the potential to provide a new perspective is welcome.

The MTR is supportive of work on game theory continuing the basis that it is jointly supervised by FFA economists' fisheries managers in consultation with SPC OFP staff. This will assist in ensuring that the outcomes will have practical benefit for FFA PIC members' on-going discussions in relation to collaborative arrangements for management of the southern longline fishery and complementary

work undertaken by SPC and FFA. This includes analysis of the biological and economic consequences, or trade-offs, along the trajectories of longline effort reduction regimes that achieve the proposed target reference point within 20 years. It would also be beneficial to prepare a succinct explanation for the potential value of game theory to contribute to decision-making in relation to harvest strategies.

4.3.2 SPC's component has been well managed and delivered

The SPC component of the SPLL has been well serviced by a reasonably stable, technically competent, team with a deep understanding of regional tuna fisheries. SPC's input has largely been intuitive and self-directed as a response to regional and national implications and specific requests associated with the status of the SPA fishery and the limited strategic direction from FFA members.

In relation to Output 3, in 2018, SPC and FFA collaborated to prepare draft ToR to develop a business case for the development of the CMS. The overall purpose was to document the technical requirements, definitions, and specifications to support the design and development of a national catch accounting module (CAM) within a regional CMS system which was anticipated to be a first significant step towards the successful implementation of the CMS.

The work was to include a review of existing national, regional, and sub-regional fisheries information management systems (IMS) in the context of developing the national CAM, on the basis that IMS are already collecting the main base data for the CAM. The ToR was well advanced, but the subsequent assignment was never commissioned. As this still has potential to be of significant national and regional benefit for FFA PICs engaged in the southern longline fishery, the MTR recommends it be resurrected and undertaken.

SPC also reports that they have started development of a catch visualisation tool (CVT) that supports a *what-if* scenario analysis for national-level application to assist countries to understand options for the management of their domestic fishery in near-real time in the absence of limits agreed at the regional level. It is designed to use either catch or effort as the management metric. SPC notes that the base data components which serve as input for the proposed CVT are already collected, processed and available in systems used by member countries and developed/managed by SPC, FFA and PNA.

In addition, under Output 4, SPC has made progress integrating ER to national and regional IMS through the *On-board* application and enhancement of TUFMAN2. Noting FFC114's commitment in June 2020 to progressively adopt ER for fishing vessels operating within their EEZs and the high seas with a view to achieving 100 per cent adoption by 2022, while catering for the special circumstances of small domestic vessels operating solely within EEZs, these developments have significant capacity to support eventual arrangements for management of southern longline fisheries.

Overall Activity management and implementation by the SPC OFP has been effective. The staff of SPC have utilised the broad provisions of the ADD to provide the advice needed by FFA members to support their consideration of management arrangements for SPA both within the FFA and within the broader Commission. This has often been anticipatory and intuitive as strategic direction from both the FFA Secretariat and FFA members has been irregular. In the absence of firm direction from a critical mass of FFA members to move forward collectively, the Secretariat has been operating in somewhat of a strategic vacuum.

4.3.3 ANCORS is a potential opportunity to re-invigorate longline fisheries management discussions

The recent engagement of experts from the Australian National Centre for Ocean Resources and Security (ANCORS²⁴) to re-examine management options for South Pacific albacore for the consideration of FFA members led to a presentation of initial findings to the SPA3 Workshop.

The research re-visited much material that had previously been discussed by the TKA during the consideration of the CMA in 2014 and 2015, and still is quite basic at this stage. But since TKA members are considering options such as pooling, trading, developing a common currency that supports different management arrangements, accommodating longline fisheries that take albacore as by-catch and multi-zone fisheries operations with different management arrangements, this initiative could provide the platform needed to re-invigorate discussions among FFA members on longline fisheries management.

The FFA Secretariat needs to work with its members to find the time required to give this the priority consideration warranted. As one stakeholder aptly described, it is perhaps one of the world's toughest fishery management challenges in any ocean.

However, apart from the work being undertaken by ANCORS, management arrangements that will support the objective of the WCPFC15 decision relating to improving the economic viability of the fishery by re-building the stock over 20 years appear as remote in 2021 as they were at the time the ADD was revised in 2018.

4.4 External factors to FFA impacting on progress

Several external factors have impacted SPLL's progress:

4.4.1 Non-FFA WCPFC members apprehensive in committing to substantive negotiations

FFA members are currently inadequately prepared for Commission-wide negotiations regarding high seas allocations and candidate actions to achieve the iTRP. In addition, a significant external factor impacting progress with achieving medium-term SPLL outcomes is also the apparent apprehension of the majority of non-FFA WCPFC members²⁵ fishing South Pacific albacore in committing to such negotiations.

s9(2)(a)

²⁵ Except perhaps China.

4.4.2 iTRP is seen as impractical and potentially jeopardises the economic viability of domestic fisheries

Although the voluntary limits adopted by the TKA in 2014 appear not to be exceeded, partly because of their aspirational nature, some TKA members are of the view that the iTRP adopted by the Commission in 2018, to be achieved over 20 years, was impractical and further jeopardised the economic viability of FFA PIC struggling domestic fisheries.

The most recent assessment of the status of the South Pacific albacore stock suggests that the target should be revised to 68 per cent $SB_{F=0}$. TKA members point out that no fishery in the world is managed on the basis of a TRP so high and that this further jeopardises the prospects for collaboration to achieve a regional management arrangement. The South Pacific albacore situation is complicated by the fact that the stock is shared with the Eastern Pacific Ocean (EPO) where it is not currently subject to any management arrangements.

4.4.3 FFA members need to agree to a harvest strategy

The work before FFA members in the Commission is to agree to a harvest strategy that maps out the trajectory for catch and/or effort reductions across the fishery required to achieve the TRP. This will not only involve extensive negotiations between FFA members and non-FFA WCPFC CCMs but the challenge of agreeing to a total EEZ limit for PICTs, and then individual allocations that factor in the effort reductions required, means that significant work remains. Ideally, FFA members would agree to in-zone arrangements prior to entering into negotiations with CCMs responsible for high seas fleets harvesting albacore in WCPFC.

It is the impasse among FFA members since TKA6 in 2017 regarding reduced expectations for the southern longline fishery that has proven to be one of the most significant factors impacting progress in this regard. The 2020 APR forecasted that these issues were to be considered at TKA9 scheduled for October 2020. The Chairman's Summary of Outcomes for TKA9 does not provide an indication that this discussion occurred.

Underscoring the need for urgency are reports that some longline vessels have migrated from tropical fisheries to the southern longline fishery. This may be pandemic-related and short-lived, as demand for fresh and chilled yellowfin and bigeye product, primarily for the hospitality sector, eased during the pandemic with the result the demand for shelf stable product, such as canned albacore, increased.²⁶

In a fishery that requires constraint in relation to catch and effort, this poses a significant threat for longline fisheries either targeting SPA or taking SPA as a significant by-catch. If the transfer consolidates and persists in the long term, the prognosis for FFA member PIC fleets is dire, particularly as PIC fleets do not benefit from subsidies reported to be enjoyed by some non-FFA WCPFC CCM longline fleets (Sen and Cartwright, 2019). The imbalance that arises because of subsidies available to competing distant water fleets is a significant external factor impacting FFA PIC member support for their domestic SPA fisheries.

²⁶ <https://atuna.com/news/year-in-review-2020>. Accessed 20 October 2021.

4.5 Internal factors to FFA impacting on progress

There have been several internal factors to FFA that have impacted on SPLL progress including capacity challenges within FFA, along with a lack of senior leadership and management oversight; the Steering Group not fulfilling its potential and issues with FFA coordination with WCPFC.

4.5.1 Leadership and management oversight needs to increase

As with PIPSM and CDEC, there has been limited executive leadership and managerial oversight for the Activity Manager that has the current responsibility for delivering the SPLL. This has been further weakened by not having the necessary resources (both technical and policy support) assigned from within the Secretariat required to effectively implement the Activities.

4.5.2 Capacity challenges within the FFA Secretariat

The FFA Secretariat staff turnover has had a significant impact on the SPLL. Changes among key personnel include the Deputy Director General, Director (Fisheries Management), MCS Policy Advisers, key FMAs and IT staff. Consequential impacts relate to reduced Secretariat capacity and capability to engage and motivate members on a critical issue of shared interest, loss of corporate knowledge, technical capacity, and capability to explore and test strategic options to facilitate and guide members to solve issues and find a solution. This has been compounded by a massive workload across other work programme areas.

The issue of FFA Secretariat capability raises questions regarding the FFA Secretariat's suitability for undertaking an Activity such as the SPLL and whether the appropriate modality was selected for Activity implementation.

Although staff turnover and the ability to attract competent staff does have implications, the FFA Secretariat has extensive accumulated experience in the implementation of large complex Activities on behalf of its members. This experience covers multi-year, multi-million-dollar Activities funded by a range of multilateral and bilateral partners over many years.

In addition, the SPLL Activity addresses the management of the southern longline fishery which is a priority issue for many FFA members. Consequently, the combination of the Secretariat's historical involvement in large Activities, the priority of the issue to be addressed and partnering with SPC in relation to scientific components, confirms that the modality for implementation of the SPLL provided for in the ADD was appropriate.

However, although the SPLL is providing FFA members with considerable financial resources to address a priority matter, there is also concern, which was raised by several stakeholders with the MTR, that the resources to service FFA member needs in respect of zone-based management and the southern longline fishery is given the support and focus its needs and is integrated into FFA's core work programme of work, rather than being reliant on relatively short-term extra-budgetary support.

FFA's 2020-2025 Strategic Plan lends support to the assertion that zone-based management arrangements for longline fisheries is a priority issue for FFA members that should qualify for support

from the Agency's core budget. However, FFA's core budget is limited and only accounts for a relatively minor proportion of the Agency's total annual expenditure.

As has been the case for much of the Agency's history, many significant activities implemented by FFA are supported by extra-budgetary sources. In relation to the SPLL, core funding supports the FMA's time servicing the Activity which provides FFA members with a time-bound opportunity to address significant issues in relation to SPA management that otherwise might not receive priority consideration in the assignment of limited funding available from the core budget.

4.5.3 FFA needs to boost resources to support the delivery of SPLL

Within the FFA Secretariat, the SPLL Activity supported the TKA Administrator's costs up until the departure of the FMA who was tasked with this responsibility in early 2020. The MTR Team was advised that, apart from travel costs in support of SPLL-related activities, no FFA staff costs have been attributed to the Activity since the departure of that FMA. Instead, any staff costs incurred by the Secretariat relating to the SPLL are considered a contribution by the Secretariat to Activity implementation.²⁷

Currently, a FMA is responsible for the administration of the SPLL in the Secretariat. That FMA also is responsible for a range of other longline fisheries-related activities including the RLLS and engagement on SPA-related matters in the WCPFC. The MTR Team was advised that approximately 20 per cent of the FMA's time was assigned to implementing SPLL.

Given the scope of the SPLL and the relatively large number of outputs that yet remain to be addressed, the SPLL requires increased Secretariat resources to support its implementation. At a minimum this should be in the form of a full-time FMA with significant fisheries policy and fisheries management experience.

It is noted that several FMA positions are currently under recruitment by the Secretariat. The MTR Team recommends that one of those positions be dedicated to the SPLL to extend and complement the existing resource that is currently assigned to SPLL.

The MTR notes that the TKA Coordinator position is not currently occupied so the funds originally dedicated to support this post are not utilised. A decision relating to dedicated staffing support to the SPG is one that rests with the FFA Executive.

4.5.4 The Steering Committee has not reached its full potential

Although there have been annual meetings of the Steering Committee, there is limited evidence that it has been effective in terms of either providing strategic guidance or in terms of monitoring the Activity's initiatives and progress. There is no indication that the APR nor the Activity Results Table (RMT) are used proactively by the Steering Committee to monitor activities. RMT entries are often repetitive and mostly record an event with limited indication of issues raised, how issues were addressed, or outputs achieved.

²⁷ Joyce Samuelu-Ah Leong, *pers. comm.*

The fact that targets and indicators for the RMT were not amended at the time the ADD Outputs were revised, and that this has not been discussed in the Steering Committee, reflects poorly on the M&E practices in place for the Activity. In addition, both the delayed availability, and apparent absence of substantive input to the reports of Steering Committee discussions, suggests a complacency towards M&E that should be actively addressed for the remainder of the SPLL.

The MTR Team was aware of occasional opportunistic meetings between MFAT and FFA Activity staff and executive management and that MFAT had queried the apparent slow progress with SPLL implementation, prior to the pandemic, during those meetings. However, there is no evidence that this resulted in substantive responses within the FFA Secretariat to address the concerns raised.

A key issue is the current approach of FFA Secretariat whereby all three Activities are managed as Activities with an apparent focus of reporting against administrative processes, as opposed to being outcome focussed and reporting on indicators, targets and outcomes which inform on substantive achievements of direct relevance to the implementation of FFA's Strategic Plan.

4.5.5 FFA member coordination in WCPFC

Although FFA members have agreed to a RLLS, there are still concerns among more southern FFA PIC members that arrangements put in place under the WCPFC's Tropical Tuna CMM do not adequately consider the implications for albacore taken as by-catch in longline fisheries targeting yellowfin and bigeye.

Some FFA members may be supportive of increased catches for bigeye which could result in increased catches of albacore as by-catch. In the view of southern FFA members with longline fisheries targeting albacore, potential adverse impacts on their longline fisheries dependent on albacore are not adequately considered.

4.5.6 Activity and meeting management requires attention

Some matters relating to Activity management at FFA do require attention. Many of these matters also concern the PIPSM and CDEC Activities in the FFA Secretariat and so may be reflective of broader corporate administrative issues across the Agency. Although it was beyond the scope of the MTR to research this in depth, issues relating to the three MFAT Activities that have impacted on SPLL and the ability of FFA members to engage in substantive discussions at meetings include issues relating to FFA's meeting and document management practices covered elsewhere in this MTR.

SPLL's monitoring and evaluation needs strengthening

An evaluation of progress is assisted with Activity administration tools such as logical framework or a Results Monitoring Table (RMT).

The SPLL ADD anticipated that the Activity RMT appended to the ADD would be revised annually to reflect on progress and consider factors influencing indicators and their targets. The ADD anticipated that the SC and bilateral meetings with MFAT would have key roles in this. The ADD considered that the SC needed to "own" the RMT, as well as the Implementation Plan.

The FFA TKA coordinator was expected to take the lead on RMT maintenance with all associated with it to commit time and resources to undertake monitoring tasks using an “agreed methodology”. It was anticipated that FFA members and their officials, i.e., not just the FFA staff, needed to take part in monitoring activities.

As noted above, the FFA Secretariat’s revision of the ADD in 2018 focussed on Outputs. The short-, medium- and long-term Outcomes remained unchanged. The broadening of SPL activities to incorporate longline fishing in all FFA members, consistent with the RLLS, is not reflected in the medium- and long-term Outcomes of the revised Activity. Similarly, the targets and indicators, at least in the versions available to the MTR, have not been revised and almost exclusively reference SPA.

The fact that the SC does not appear to give any attention to that is not a positive reflection on the M&E framework in place to monitor Activity progress and to respond to challenges. Moving forward, this will need to be addressed.

4.5.7 The outlook for South Pacific albacore fisheries management

The status of the fishery

SC17 in August 2021 reported that latest biomass estimates for SPA is more pessimistic than the assessment for the period 2016-2019 confirming a substantial decline in stock status. Projections indicated that the SPA stock has a greater than 20 per cent risk of falling below the LRP in 2021 under both catch and effort scenarios, and in most cases the TRP is not achieved within the 20-year projection period for re-building the stock adopted by the Commission (WCPFC15, Summary Report, para. 207). SC17 reiterated its previous advice that longline catch be reduced to avoid further and extended declines in the vulnerable biomass so that economically viable catch rates can be maintained acknowledging that reductions in longline fishing mortality will be required to return the vulnerable biomass to the 2013+8 per cent level agreed at WCPFC15.

SPC has provided the re-assessment to WCPFC18 advising that, to achieve the WCPFC-Convention Area (WCPFC-CA) longline vulnerable biomass goal, the recalibrated southern WCPFC-CA albacore TRP depletion level is 68 per cent $SB_{F=0}$ ²⁸. SPC notes that both the 2021 and 2018 assessments underscore the fact that the interim TRP will not be achieved under recent catch levels in the southern WCPFC-CA and that future TRP-related catch levels will need to be periodically reviewed as knowledge of the South Pacific albacore stock improves through the adoption of a harvest strategy that can adapt dynamically.

FFA member collective action is critical

The FFA Secretariat has been reasonably proactive in exploring options for supporting FFA members’ consideration of zone-based management arrangements as a priority before pushing for compatible limits on the high seas in the WCPFC. The large number of papers produced by the Secretariat for meetings of the TKA after TKA6, when the CMS was shelved, demonstrate some exasperation on the

²⁸ SPC. 2021. Recalibration of the target reference point for South Pacific albacore. Western and Central Pacific Fisheries Commission, Eighteenth Regular Session, Electronic Meeting, 1-7 December 2021 WCPFC18-2021-17, 1 November 2021. SPC-OFP Pacific Community (SPC), Noumea, New Caledonia. 9 pages.

part of the Secretariat in terms of being able to motivate a critical mass of TKA participants to agree to collective action.

It is the lack of strategic direction from FFA members, motivated by a hesitancy to agree to a process that may have significant adverse national implications, that has had the most impact on SPLL delivery. According to several stakeholders, this has been compounded by the absence of strong strategic leadership and guidance by the FFA Secretariat to facilitate a collective way forward across its members. While this situation persists, the outlook for regional SPA longline fisheries will continue to bleak.

There is a view among some stakeholders that, unless there is a major crisis, and without a constraining management arrangement, the fishery will continue generating relatively limited economic rent for unsubsidised fleets. A crisis that might motivate action is unlikely to be in the form of a stock collapse given the demonstrated resilience of the stock.

Continued delay in the formal establishment of in-zone arrangements plays into the hands of non-FFA WCPFC members fishing on the high seas as there is nothing against which to demand compatibility between high seas and in-zone measures. Unfortunately, the cohesion and common purpose so effectively demonstrated by the PNA whose EEZs account for such a significant proportion of the tropical purse seine fishery is not replicated among the FFA members with national interests in SPA where individual EEZ fisheries do not support fisheries with the same commercial value as those of the PNA and are of relatively limited regional fishery significance.

Whether effort-, catch- or capacity-based, if members maintain their high aspirational limits for their SPA fisheries, the prospects for achieving consensus among the FFA members on limits for the southern longline fishery currently appear remote. Like-minded FFA members, who are willing to demonstrate flexibility on zone limits, can still make progress on collaborative management arrangements provided their collective EEZs account for a significant proportion of the southern longline fishery. Initial steps involving a small number of participants may serve as a pre-cursor to longer-term broader engagement, including with non-FFA PICTs.

In terms of the current political environment, the SPG, whose members account for more than 50 per cent of the initial TKA zone limits agreed in 2014, offers an obvious starting point. Efforts to broaden engagement should focus on Solomon Islands (which would take the proportion of EEZ catch to >75 per cent of the TKA aspirational catch) and the French Territories (the benefits of collaboration for which were noted in the game theory research led by the EDF), in the first instance.

On the basis that the potential for improved economic benefit for PICTs is strengthened through collaboration,²⁹ the FFA Secretariat has already undertaken considerable work relating to compatibility between management arrangements, pooling, and trading possibilities. This is being further investigated in 2021 under a contract with ANCORS, which is also examining options for accommodating different metrics (catch-, effort- or capacity metrics) to achieve harmonisation (a “common currency”) across different zone-based management arrangements. While these topics are not new to FFA members who have been considering possible management arrangements for many years, it is a positive development. In relation to reinvigorating discussions on collaborative

²⁹ See Campling and Harrington, 2021.

management arrangements for southern longline fisheries, as envisaged in the RLLS, there is an immediate need for a commitment to reducing total catch commensurate with recent advice provided by SPC in relation to their review of the TRP requested by SC17.

China's stake continues to grow

In the longer term, there is a possibility that the albacore fishery could be consolidated under one dominant stakeholder, such as China, whose fleets are responsible for the fastest growing albacore catch over the last 15 years and which already engages in significant charter operations in FFA PIC members (e.g., in Vanuatu where they mostly fish on the adjacent high seas).

China commercial operators already have significant commercial interests in Taiwanese albacore operations, and they continue to strengthen their engagement in South Pacific albacore fisheries both on the high seas and in FFA PICs. The prospects of a multilateral access arrangement for Chinese flagged longline vessels is a possibility but first requires FFA PICs to set realistic zone-based limits and establish systems to be able to monitor catch, effort, and capacity across multiple zones.

To support more detailed consideration of issues such as these, the MTR recommends that the SPLL commission a political mapping exercise that reviews the role and future aspirations of all key non-FFA stakeholders in the southern longline fishery as background information to support further discussion on candidate strategies for FFA members to engage and respond.

4.6 How cost effective is the approach employed to deliver results?

There are few alternatives. The costs associated with supporting fisheries management among FFA members are significant. The approach takes advantage of significant corporate knowledge, experience, and deep understanding of WCPO fisheries, including institutional arrangements supporting them, in the FFA Secretariat and the SPC OFP. In this regard, the approach is cost-effective as alternative arrangements would not benefit from the established institutional arrangements and country relationships supported by these agencies. The potential for the PNAO to contribute to SPLL implementation remains unexplored.

4.7 Options for improving implementation of the SPLL

The SPLL can be strengthened by taking a combination of the following actions:

4.7.1 Strengthen management, implementation, and governance

The Activity requires increased engagement and strategic oversight by management in the FFA Secretariat.

Additional technical and policy staff with experience in multilateral fisheries management need to be assigned to the Activity to provide additional support to the current FMA. Such expertise could be sourced by dedicating additional FMA resources to the Activity. If that expertise is not available in FFA then external expertise should be secured under contract.

As discussed elsewhere in this MTR, Activity management also requires strengthening. This includes meeting management including preparations and outcome reporting. Document management, including version control and archiving, also requires attention. The MTE recommends that responsible staff receive training to strengthen their existing managerial skills and knowledge.

It is not evident that the RMT was revised in full at the time the ADD was revised to reflect the changed focus of the SPLL Activity because of the TKA6 decision to pause work associated with the CMA in 2017. This relates to short-, medium and long-term Outcomes and the indicators and targets associated with each output. The MTE recommends that the RMT be immediately revised in an exercise led by the Director, Fisheries Management.

4.7.2 Commission a political mapping exercise for FFA members relevant to South Pacific albacore

The MTR recommends that the SPLL commission a political mapping exercise that reviews of the role and future aspirations of all key non-FFA stakeholders in the southern longline fishery as background information to support further discussion on candidate strategies for FFA members to engage and respond.

4.7.3 Increase SPC's capacity to provide on-going scientific and technical support advice

As of late 2021, SPC has utilised most of the budget allocated to support scientific advisory services to the SPLL. On the other hand, considerable funding remains in the FFA-implemented component. It is recommended that SPC OFP be invited to propose a two-year programme of work to continue its SPLL support to May 2024.

The proposed budget to support this work is NZ\$1.5 million. It is recommended that this be transferred from funds that are yet to be drawn down across Outputs 2, 3, 4 and 5 initially identified for FFA implementation. Activities that could benefit from on-going SPC support under the SPLL could include:

- collaboration with FFA relating to economic considerations and to evaluate catch reduction pathways to achieve the TRP
- provide technical support to catch allocation discussions, whether effort, catch or capacity-based HS/EEZ
- evaluate compatibility and relationships between different management regimes with the intent to provide a 'common currency' across alternative management regimes
- support the harvest strategy work SPC is doing for the Commission and for FFA members on decision-making related to harvest strategy development
- provide information at the national level for the implementation and monitoring of management schemes
- development of E-products, ER and EM, to improve the timeliness and quality of data from longline fisheries

- continue the design and development of national catch monitoring tools to enhance members' management capabilities, including data systems to utilise real-time data to provide reports (zone catch status, etc), catch visualisation tools and predicative, what-if-scenarios tools
- integrate southern longline modules into SPC's tuna data and stock assessment workshops
- support a Pacific Island Fishery Professional position at the OFP.

4.7.4 Resurrect the national catch management accounting module

Resurrect and commission the work to document the technical requirements, definitions, and specifications to support the design and development of a national CAM within a regional CMS system. This work still has potential to be of significant national and regional benefit for FFA PICs engaged in the southern longline fishery.

4.7.5 Continue the work on game theory and build on ANCOR's work

The MTR is supportive of work on game theory and continued development of candidate management arrangements continuing on the basis that it is jointly supervised by Fisheries Development and Fisheries Management Division and SPC staff.

4.7.6 Promote synergies with CDEC

The September 2019 SPLL APR noted potential synergies between the SPLL Activity and the CDEC Activity, particularly regarding the regional framework for an e-CDS that was being developed at that time. The APR noted an important task was to assess the status of the CDS systems or processes that FFA members were using and to evaluate existing, or potential, data sharing possibilities through NTSA or TKA. A baseline review of national systems applicable to PSM and CDS was completed in 2018 with funding support from the PIPSM Activity.³⁰ It remains to be demonstrated how the synergies between these Activities will be achieved in relation to the SPLL.

This is an important point as the relationship between potential CDS implemented in FFA PIC members with management arrangements established for SPA, remains poorly elaborated. CDS can serve an integral role in national and regional management arrangements for SPA – serving as a reconciliation and verification facility between vessel log sheet reports, VMS reporting, landings and exports and serving to identify reporting gaps and anomalies.

While this functionality has not yet been effectively elaborated in either the CDEC Activity or the SPLL Activity SPC has developed prototype catch visualisation tools that, utilising ER from vessels among other data sources, provides PIC members with a facility to monitor and reconcile reported catches

³⁰ Blaha, F. and Johnson, D. 2018. FFA PSM Consultancy. Task #1&2. *Port Activities Study and Framework for effective PSM in FFA's membership*. Final Draft Report. 59 pages.

against landings and exports including export destinations. It is recommended that the prototype be tested for broad implementation across TKA members.

4.7.7 Strengthen engagement with the PNAO

Consistent with Output 3, the FFA Secretariat should engage with the PNAO on LL VDS-related issues including in relation to compatibility initiatives. A programme of work should be prepared to support this endeavour.

4.7.8 Financial considerations

The MTE is of the view that, given the significance of the South Pacific albacore to the fisheries of FFA PIC members, and on-going issues associated with the management of longline fisheries harvesting SPA, a no-cost extension of two years, through to May 2024, is justifiable. NZ\$5.3 million is available in the Activity budget to support such an extension.

Robust scientific advice and modelling to support future deliberations by FFA PIC members concerning options for the management of the southern longline fishery is critical. The priority issues are projections and options for achieving the TRP and in establishing robust management arrangements, with a focus on zone-based arrangements, including national implications under different management scenarios whether on the basis of catch or effort, extending to the high seas. SPC's support to zone-based arrangements, particularly in the context of harvest strategies, should continue in relation to developing tools for better application of near real-time data (ER and EM) integrated to zone-based catch and/or effort monitoring tools.

On this basis, it is recommended that SPC be invited to prepare a detailed proposal for the application of an additional NZ\$1.5 million towards these efforts (across Outputs 1 and 4) over a two-year extension of the SPL Activity. It is recommended that the additional NZ\$1.5 million be sourced from Output 2 (NZ\$200,000), Output 3 (NZ\$500,000) and Output 5 (NZ\$800,000).

FFA should prepare a complementary two-year programme of work supported by the balance remaining in the Activity: approximately NZ\$3.822 million. Considerable work remains in relation to zone-based management options building on the work commenced in 2021 by ANCORS under contract to the SPL.

This will provide an opportunity to, at least partially, address critical work that qualifies for support under the SPL but has suffered because of a range of factors including the shelving of the CMA and the pandemic. Based on the advice to WCPFC18 prepared by SPC at the request of SC17, it is also a critical time in the history of fisheries for South Pacific albacore.

The options for transferring additional funding from the FFA component of the SPL Activity to the SPC could be accommodated by a well-documented contract variation rather than a revised GFA.

A summary of the financial status of the SPL Activity is presented at Appendix B.

5. Conclusions

5.1 Summary

5.1.1 Activities are relevant, fit for purpose and cost-effective

All three Activities, the PIPSM, the CDEC and the SPLL, were relevant at the time the ADDs were prepared and are still relevant today. Key policy documents support this, and the strengthening of management arrangements for SPA has been a significant issue for FFA Pacific Island members for almost 30 years.

Overall, the Activities' designs were fit for purpose when created. All three ADDs provided a solid platform to make progress towards their respective short-, medium- and long-term outcomes and were based on FFA's extensive experience with the implementation of large complex Activities, which is a reasonable assumption.

The approach for all three Activities takes advantage of the significant corporate knowledge, experience, established country relationships supported by existing institutional arrangements, and a deep understanding of WCPO fisheries. In this respect, the design is cost-effective.

The cost-effectiveness of the implementation of the current three Activities moving forward would be improved with a combination of increased engagement of (i) the FFA executive management, and (ii) enhanced technical and policy expertise in Activity implementation from the FFA Secretariat.

5.1.2 Progress across all three Activities has been limited

Even though the FFA Secretariat has extensive accumulated experience in the implementation of large complex Activities on behalf of its members, which includes experience of successfully delivering multi-year, multi-million-dollar Activities funded by a range of multilateral and bilateral partners over many years, the progress made towards achieving these three Activities' outcomes has been limited and somewhat slower than expected.

The primary achievement for PIPSM was the adoption of the Regional PSM Framework for port State measures in 2020 in its almost four years of implementation. This was the result of the work involving several consultancies that provided foundational material and numerous workshops and meetings across 2018-2020. This work also contributed to a baseline appraisal of national PSM arrangements, market State requirements (which are more relevant to CDEC), the draft IUU risk assessment criteria, e-PSM tool development and some preliminary support at the national level to nine FFA PIC members. However, the extent that this has been operationalised among FFA PICs members, mostly determined by the frequency of port use by fishing vessels, varies significantly.

For the CDEC, some progress has been made towards the short- and medium-term Outcomes, with the adoption of the Regional CDS Framework in 2021. The medium-term outcome relating to MCS and PSM frameworks that detect, deter, and respond to IUU fishing in the Pacific has at least been partially improved.

Like PSM, some FFA members (PNG, Fiji, Solomon Islands, Kiribati and RMI) have made progress with the development and implementation of national CDS. Others, such as Tonga and Samoa, are in the early stages of considering CDS options. However, there is no consistent application by PIC fisheries administrations, and synergies and harmonisation remain underdeveloped.

When the CDEC and PIPSM Activities were conceived there was a strong sense that a regional approach would be of broad benefit and that the outcomes would apply to all FFA members. However, in the early stages of working towards this, it became apparent that countries are at different stages in considering both PSM and CDS and needs and priorities were not necessarily shared by all members. The results are Regional Frameworks that are, in effect, guidelines, which are non-prescriptive and open to interpretation. Also, there remains a lot of debate about the actual purpose of a CDS.

Progress has been made against SPL's Outputs 1 and 3. SPC has provided substantive technical information and advice to FFA members to the status of the SPA resources, the fisheries that harvest SPA, and biological and economic issues associated with the assessment of options for high-seas and zone-based management. SPC has also started the development of a catch visualisation tool that supports a what-if-scenario analysis for national level application to assist countries understand options for the management of their domestic fisheries in near real time in the absence of limits agreed at the regional level. Progress has also been made in relation to Output 4 through integrating ER to national and regional IMS through *On-board* and *On-shore* applications and enhancement of TUFMAN2.

The FFA has also been pro-active in exploring options for FFA's members' consideration of zone-based management arrangements as a priority before pushing for compatible limits on the high seas in the WCPFC by producing numerous analyses in an effort to motivate a critical mass of TKA members to agree to collective action. This effort is on-going with, for FFA members and the Secretariat alike, frustratingly little apparent progress.

The 2021 work by ANCORS is the most recent attempt to re-invigorate regional engagement on options for zone base management by the FFA to help its members develop a positive direction forward, and to overcome the hesitancy of members to agree to a process that may have adverse national implications. While this situation persists, the economic outlook for FFA PIC member engagement in regional SPA longline fisheries will remain stalled and, at worst, deteriorate.

5.1.3 Factors affecting progress made

Risks were identified in each of the Activities' ADDs. However, these risks, had a much greater collective impact upon the Activities' implementation, and progress made, than was probably anticipated at the time the ADDs were designed.

The period since the commencement of the three Activities has witnessed a significant movement of staff at the FFA Secretariat, many of whom had varying roles in the implementation of the PIPSM, CDEC and SPL. Because of these departures, the FFA's capacity and capability has been compromised. This has been compounded by inadequate managerial oversight and technical support for the Activity Managers and Technical Adviser that have the current responsibility for delivering the three Activities.

Several stakeholders also reported poor internal coordination and collaboration among key groups within the Secretariat, which has consequently impacted on the progress made, for both the PIPSM and CDEC. Both internal and external stakeholders were critical of FFA's IT services and their working relationships, which again impacted on the delivery of both PIPSM and CDEC. The MTR supports the urgent need for a comprehensive review of FFA's IT services.

The inadequacy of senior leadership to provide the necessary strategic direction and the management required for effective implementation, to coordinate and manage activities, to engage and motivate members on critical issues of shared interest, and to explore and test strategic options, across all three Activities has adversely impacted implementation progress. There is also little evidence that the SC has been effective in terms of providing strategic guidance on critical issues or in terms of monitoring the Activities and their respective progress for PIPSM and CDEC.

Progress has also been hampered by a significant workload carried across FFA and the critical need to strengthen practices around the servicing of Activity-related meetings, document management, as well as to strengthen M&E practices in relation to all three Activities.

External factors to FFA have also impacted on progress being made by each of the Activities. As a result of the COVID-19 pandemic, there have been restrictions on travel that has constrained face-to-face engagements. This has been a significant external influence on implementation progress for all three Activities. It has resulted in less-than-optimal attendance at some meetings and poorer levels of engagement by FFA members. This challenge is compounded by the fact that some fisheries administrations are facing capacity issues which impact on their ability to engage in the heavy meeting schedule and to absorb tasks associated with both PIPSM and CDEC within already demanding work schedules.

Regional factors have also impacted the delivery of CDEC and progress made. Several FFA members were advancing the development of national CDS prior to the CDEC starting, and the PNAO has developed a CDS module for FIMS. The situation has been exacerbated by there not being a clear understanding and/or clear communication of CDEC's core purpose. Is the primary purpose access to markets, such as the EU, or is it for fishery management, to verify catch against agreed limits? Or is it for both?

There was a view that the region was inadequately prepared for the implementation of the PIPSM and CDEC. There was a belief, despite the PSM gaps review commissioned by FFA in 2017, insufficient effort had been invested in assessing the gaps and needs across FFA PIC members. It was suggested that, instead, a two-to three-year preparatory activity would have clarified needs and laid the foundation for an intervention that had improved prospects of acceptance and success.

Regarding the PIPSM, the FAO PSMA, coming into force in 2016, which led to increased requests for FFA Secretariat legal assistance, policy reviews, assessments related to PSMA ratification, national led PSM gaps, and capacity building, had implications for the roll out of the proposed PIPSM initiatives.

Several external factors have impacted on SPL's progress. The most significant, affecting progress towards achieving SPL's medium-term outcome, is the apprehension of non-FFA WCPFC members in committing to substantive negotiations regarding management arrangements that support WCPFC15's decision relating to the iTRP.

In relation to general project administrative issues, the MTR notes:

- The projects were not 'review ready'. Preparatory work to assimilate relevant documentation, financial summaries and initial engagement with stakeholders had not been undertaken prior to the commencement of the MTR,
- Although the MTR had limited opportunity to observe project-related meetings, there is evidence to suggest that meeting management requires strengthening. This relates to i) the availability of meeting documents sufficiently in advance of meetings to enable delegations to thoroughly review documentation and undertake consultations relevant to the issues to be addressed, and ii) the preparation, quality of content and distribution of meeting reports, and
- Document management generally requires improvement. This relates to ensuring project-related documentation is dated, responsible officers identified, version control is implemented and that there is a systematic process for the archiving and distribution of final versions.

5.1.4 Next steps

All three Activities' likelihood of progress being made towards achieving their respective outcomes will be enhanced by setting a stronger strategic direction, strengthening FFA senior team's engagement, leadership and management and boosting resourcing. Improved general project administration and M&E practices will also support better results, as would improved inter-Activity synergies between PIPSM and CDEC, and CDEC and SPLL.

Piloting PIPSM and CDEC initiatives with two or three PICs to identify and capture lessons on what works and what does not could lead to useful outcomes. This approach is likely to be more successful than a broad regional endeavour that attempts to engage all FFA members who have a diverse range of needs and interests regarding PSM and CDEC.

Development and implementation of a Communication Plan will also enhance FFA members awareness of the support available through these Activities.

In terms of future stimulus to reinvigorate interest in CDS, FFA members could press for future revisions of the tropical tuna CMM to include a provision for the implementation of a CDS to trace bigeye from point of capture to point of landing after export. If this occurred, it might expedite the CDS-related work.

CDEC would also benefit from implementing the recommendations of the Brisbane inter-agency workshop, and to fast track the development of SPC's e-CDS support tools, as well as resurrect the CMS ToR work, which was anticipated to be a first significant step towards the successful implementation of the CMS, and remains of potential value to FFA members.

Perhaps the most pressing challenge for the SPLL is to agree a harvest strategy that maps out the trajectory for effort reductions across the fishery required to achieve the TRP. This will require significant work, supported under the context of the development of harvest strategies, to reach agreement to a total of EEZ limit for PICTs, and then individual allocations that factor in the effort reductions required.

To support this, SPLL should continue to support the ANCORS work to develop options for management for southern longline fisheries, and integrating where appropriate, relevant outcomes from the game theory work. SPC's scientific and technical advisory services to the SPLL should also continue, including its work around developing the catch visualisation tool.

Other actions that potentially would reinforce SPLL would be to commission a political mapping exercise of all key non-FFA stakeholders' role and future aspirations in southern longline fishery to support development of future strategies for FFA members to engage and respond to, and to commission work to support the development and design of a national catch accounting module, within a CMS system. This has the potential to be of significant regional and national value for FFA PICs engaged in southern longline fishery.

5.2 Recommendations

What follows is a high-level summary of key recommended actions that both MFAT and the FFA should consider how best they might take these Activities forward.

5.2.1 Recommendations for PIPSM, CDEC and SPLL

Strengthen management, implementation, and governance

- The Activities require increased strategic oversight, engagement and active management by the senior leadership and management team in the FFA Secretariat. This will improve the identification of priorities and the marshalling and coordination of resources appropriate to address the needs for each Activity.
- The TWG should be formally re-established with the oversight and direction of executive management. It should engage policy and technical personnel across all relevant Secretariat Divisions (Fisheries Development, Fisheries Management, Fisheries Operations (including IT services) and Legal), work to agreed ToR, set a regular meeting schedule, agree to tasks, roles, and responsibilities, and hold colleagues to account in terms of expectations.
- The areas of support to the SCs that require strengthening include version control for meeting discussion documents, archiving of meeting material, and the management of meeting reports. The management of meeting reports requires the timely preparation of a draft summary report with an invitation to participants to provide comments and revisions, and the circulation of a final meeting outcomes report.
- Project administration requires strengthening in relation to Activity planning, stakeholder engagement, resource mobilisation and allocation, monitoring and reporting, records management, communications, Activity partnerships, meeting management, and monitoring and evaluation.
- M&E practices and processes also need considerable strengthening across PIPSM, CDEC and SPLL including more detailed SC examination of APRs and RMT updates to better monitor Activity implementation and enable timelier response/s to any challenges.
- Document management practice needs strengthening, including version control and archiving.

- A formal Communication Plan should be prepared, resourced, and implemented for the remainder of the PIPSM and CDEC.
- Based on the evidence presented to the MTR in relation to the three Activities, the MTR supports the need for a comprehensive review of FFA's IT services.

Increase technical and policy support for the three Activities

- Staff with professional MCS experience, particularly with experience in PSM and CDS, and multilateral fisheries management need to be assigned to these Activities to provide support to the Activity Manager and the CDS Technical Adviser. Such expertise could be sourced by dedicating additional FMA resources to the Activity. If that expertise is not available in FFA then external expertise should be secured under contract.
- Additional fisheries management capacity and capability is also required for SPL- associated activities.

Promote synergies between Activities

- The ADD noted potential synergies between the three Activities. The linkages between the PIPSM and the CDEC Activities are particularly strong with much of the work programmed for support under the PIPSM serving as foundational for the CDEC. A baseline review of national systems applicable to PSM and CDS was completed in 2018 with funding support from the PIPSM Activity. This review could be usefully revisited to provide a foundation for future work.
- At the time of the MTR, four years into the implementation of both Activities, it remains to be demonstrated how the synergies between these Activities will be achieved.

5.2.2 Recommendations for PIPSM and CDEC

Offer opportunities to two or three countries to pilot Activity PIPSM and CDEC initiatives

- The PIPSM and the CDEC Activities should offer opportunities to two or three FFA PIC members who have demonstrated a keen interest in engaging in the respective Activity to provide the platform for Activity implementation.
- The rationale is that, at the end of the Activity, more lessons will be available from the appraisal of a small number of comprehensively planned and implemented pilots than a broad regional endeavour that attempts to engage all FFA members who have a diverse range of needs and interests regarding PSM.

Promote synergies with PIPSM and CDEC

The potential linkages between the PIPSM and the CDEC Activities are particularly strong with much of the work programmed for support under the PIPSM serving as foundational for the CDEC. However, at the time of the MTR, four years into the implementation of both Activities, it remains to be demonstrated how the synergies between these Activities will be achieved.

Fast track development of SPC's e-CDS support tools

- It is recommended that SPC fast track the further development of its e-CDS support tools. Opportunities to engage with FFA Secretariat's IT should be provided in relation to this, particularly in relation to linkages to RIMF, but these engagement efforts should not constrain SPC's progress in addressing this need.
- SPC should be invited to prepare a programme of work, with associated budget, for consideration under the CDEC Activity to support this action.

5.2.3 Recommendations for CDEC

Revisit the Brisbane inter-agency workshop's recommendations

The workshop provided sound advice for a program of work for support under the CDEC. Most of that work remains unattended to. It is recommended that the revised Implementation Plan incorporate:

- development of a CDS Activity Communications Strategy,
- complete more detailed analysis of national supply chains for FFA Members' tuna products as country visits permit,
- commission a fresh discussion paper to inform members consideration of national, sub-regional and regional e-CDS, as proposed by the Brisbane Workshop,
- commission an analysis of the potential costs to FFA Members of a regional e-CDS compared to nationally implemented e-CDS and assesses these against the benefits. Include a discussion of the short- and long-term resourcing implications, and the potential for cost recovery, and
- support the development and implementation of national and regional e-CDS through laws, regulations, licensing, agreements, contracts etc. regulating fishing, fish processing and fish trading operators³¹.

Re-examine needs

- When the CDEC and PIPSM Activities were conceived there was a strong sense that a regional approach would be of broad benefit and that the outcomes would apply to all FFA members. In the early stages of working towards this, it became apparent that countries are at different stages in considering both PSM and CDS and needs and priorities were not necessarily shared by all members.
- In terms of future stimulus to reinvigorate interest in CDS, FFA members could press for future revisions of the tropical tuna CMM to include a provision for the implementation of a CDS to trace bigeye from point of capture to first point of export. If this occurred, it might expedite the CDS-related work.

³¹ Note that some activities are being implemented under this recommendation (for example in PNG, Solomon Islands, Vanuatu, and Tonga) and some members, for example FSM, are addressing related initiatives using external consultants.

Finalise ToR and commission a business case for a CMS

- The work anticipated through the development of a business case for the development of the catch management scheme (CMS) is still of potential value to FFA members. The overall purpose was to document the technical requirements, definitions, and specifications to support the design and development of a national catch accounting module (CAM) within a regional CMS system which was anticipated to be a first significant step towards the successful implementation of the CMS.
- As this assignment still has potential to be of significant national and regional benefit for FFA PICs engaged in the southern longline fishery, the MTR recommends it be resurrected, the ToR reviewed and agreed, and the drafting of a business case be commissioned.

5.2.4 Recommendations for SPL

Revise the Activity logic

- As a consequence of the 2017 decision by the TKA to suspend consideration of a CMA, in consultation with MFAT and SPC, undertake a thorough revision of the Activity logic to reflect the changed scope to support the implementation of the RLSS.

Maintain SPC's capacity to provide on-going scientific advice

- It is recommended that SPC OFP be invited to propose a two-year programme of work to continue its SPL support to May 2024. Activities could include:
 - in collaboration with FFA in regard to economic implications, evaluate catch reduction pathways to achieve the TRP,
 - provide technical support to catch allocation discussions, including whether effort, catch or capacity-based in relation to both high seas and EEZs,
 - evaluate compatibility and relationships between different management regimes with the intent to provide a 'common currency' across alternative management regimes,
 - support the harvest strategy work SPC is doing for the Commission,
 - provide information to national fisheries administrations regarding the implementation and monitoring of management schemes,
 - development of E-products, ER and technical support to national and sub-regional EM initiatives, to improve the timeliness and quality of longline data,
 - continue the design and development of national catch monitoring tools to enhance member's management capabilities, including data systems to utilise real-time data to provide reports (zone catch status, etc), catch visualisation tools and predicative, what if-scenarios tools,
 - integrate southern longline modules into SPC's tuna data and stock assessment workshops, and
 - support a Pacific Island Fishery Professional position at the OFP.
- The MTR recommends that NZ\$1.5 million be transferred from SPL Activity Outputs 2, 3 and 5 to Output 1 and 4 to support this work.

Continue the work on game theory and build on ANCOR's work

- The MTR is supportive of work on game theory continuing, on the basis that it is jointly supervised by FFA economists in the Fisheries Development Division and FFA fisheries managers in the Fisheries Management Division.
- The ANCOR initiative could provide the platform needed to re-invigorate discussions among FFA members on longline fisheries management. This work needs to be closely supervised by the Fisheries Management Division in the Secretariat.

Commission a political mapping exercise of all non-FFA members

- The MTR recommends that the SPLL commission a political mapping exercise that reviews of the role and future aspirations of all key non-FFA stakeholders in the southern longline fishery as background information to support further discussion on candidate strategies for FFA members to engage and respond.

National catch management accounting module

- Resurrect and commission the work to document the technical requirements, definitions, and specifications to support the design and development of a national catch accounting module (CAM) within a regional CMS system.
- The work was to include a review of existing national, regional, and sub-regional fisheries information management systems (IMS) in the context of developing the national CAM, on the basis that IMS are already collecting the main base data for the CAM.
- This work still has potential to be of significant national and regional benefit for FFA PICs engaged in the southern longline fishery.

Promote synergies with the CDEC Activity

- While this functionality has not yet been effectively elaborated in either the CDEC Activity or the SPLL Activity SPC has proceeded to develop prototype catch visualisation tools that, utilising ER from vessels among other data sources, provides PIC members with a facility to monitor and reconcile reported catches against landings, limits and exports including export destinations.
- It is recommended that the prototype be tested for broad implementation across TKA members.

5.3 Financial considerations

The MTR is of the view that, given the significance of the South Pacific Albacore to the fisheries of FFA PIC members, and on-going issues associated with the management of longline fisheries harvesting SPA, a no-cost extension of two years for SPLL is justifiable.

On this basis, it is recommended that SPC be invited to prepare a detailed proposal for the application of an additional NZ\$1.5 million towards efforts (across Outputs 1 and 4) over a 2-year extension of the SPLL Activity. It is recommended that the additional NZ\$1.5 million be sourced from Output 2 (NZ\$200,000), Output 3 (NZ\$500,000) and Output 5 (NZ\$800,000).

FFA should prepare a complementary two-year programme of work supported by the balance remaining in the Activity; approximately NZ\$3.822 million.

As discussed under the SPLL Activity, funds remaining in the CDEC Activity (approximately NZ\$4 million) are unlikely to be fully utilised at the time of the scheduled conclusion of the Activity in October 2023. The MTR recommends a 12-month no-cost extension to the Activity through until at least October 2024.

A detailed work plan for this period should be prepared by the FFA secretariat and comprehensively reviewed at the next Steering Committee.

The MTR also recommends that the PIPSM be extended, at no-cost, to at least May 2023. An outline of the activities that are candidates for support using this funding is presented in the Report.

The MTR also noted a lack of clarity in relation to the application of FFA's Management Fee and Management Support Fees. Data provided to the MTR indicate that there is no consistency in the way these items are budgeted, or expenditure reported. It is recommended that these components of Activity finances be reviewed.

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Appendix B Review of Activity Finances

Introduction

The outcomes of a review of budget forecasts and subsequent drawdown of Activity funds from Activity commencement to the end of 2020 is presented. The review relied on summary financial information provided by Activity staff who liaised directly with the Agency's finance personnel to respond to questions posed by the MTR team. The Activities are included in annual audits of FFA accounts undertaken by a third-party independent auditor and reported to the Forum Fisheries Committee (FFC). No audit reports were available to the Review.

South Pacific Longline Policy and Management

New Zealand's Ministry of Foreign Affairs (MFAT) is providing up to NZ\$7,095,665 to support the implementation of the South Pacific Longline Policy and Management Activity (SPLL) over the period 2017-2022. The SPLL is implemented by FFA in collaboration with SPC. It was originally scheduled to be implemented over 5 years commencing in February 2017. At the end of the third year, in 2020, total expenditure amounted to 25 per cent of budget (**Table 1**).

Table 1. Budget summary for the SPLL Activity showing the original budget allocation against each Output and associated costs, actual reported drawdown, the proportional allocation of the total budget to each Output and the proportional actual expenditure against each Output and associated cost.

It also presents the balance as of the end of 2020. [Output 1. Scientific information and advice, 2. Catch management scheme, 3. Policies and regulations, 4. CMS support systems, and 5. Training].

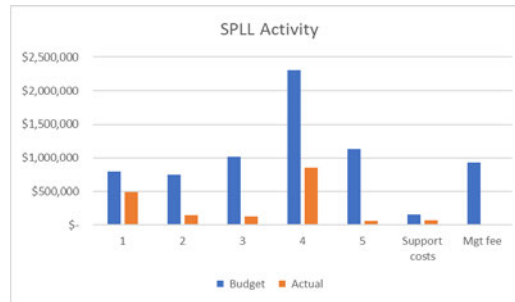
SPLL (NZD)					
Output	Budget	Actual	% of budget	% of expenditure	Balance
1	\$ 801,832	\$ 498,613	11%	28%	\$ 303,219
2	\$ 753,343	\$ 150,182	11%	8%	\$ 603,161
3	\$ 1,016,974	\$ 133,122	14%	8%	\$ 883,852
4	\$ 2,305,404	\$ 858,598	32%	48%	\$ 1,446,806
5	\$ 1,135,166	\$ 64,477	16%	4%	\$ 1,070,689
	\$ -	\$ -			\$ -
	\$ -	\$ -			\$ -
Support costs	\$ 157,424	\$ 68,432	2%	4%	\$ 88,992
Mgt fee	\$ 925,522	\$ -	13%	0%	\$ 925,522
Total	\$ 7,095,665	\$ 1,773,424	25%		\$ 5,322,241

The drawdown of funds against budget for each Output is presented in **Figures 1** and **2**. Of the NZ\$1,773,424 drawn down to the end of 2020, 48 per cent had been committed to Output 4 and 28 per cent to Output 1 which together accounted for 76 per cent of expenditure to date or 19 per cent of the total budget for the Activity. The remaining Outputs and associated agency costs each accounted for less than 10 per cent of actual expenditure for the period from February 2017 to the end of 2020.

It is FFA Secretariat policy to charge 15 per cent against extra-budgetary funds received as a Management Fee. This is broadly in line with what was budgeted for the SPLL Activity although the actual amount charged is closer to 13 per cent. The Management Fee is charged against funds received so, if FFA does not request funds from MFAT, no Management Fee is generated. The financial

summaries provided to the MTR reported Management Fees were budgeted each year (Total NZ\$848,494, 2017-2020) but there was no expenditure recorded against those years. In 2021, NZ\$925,552 (13 per cent of Activity budget) was provided for against this line item.

Figure 1. Summary of the SPL Activity budget against actual drawdown (2017-2020).



It was explained to the MTR that Management Support Fees are applied to support indirect costs not necessarily specified in the Activity budget. Management Support Fees are applied to items such as monitoring and evaluation, travel for Activity staff and Activity administration. Activity financial records for the period 2017-2020 indicate that funds were budgeted against this item in 2018 (NZ\$14,086) and 2020 (NZ\$2,861) but expenditure was only reported for 2018 (NZ\$71,293; five times budget). Activity staff explained that this expense was mainly associated with finalisation of the Results Management Table.

The MTR recommends that the distinction between the Management Fee and Management Support Fee, and the activities each covers, requires greater clarity and reporting transparency.

Figure 2. Summary of the SPL Activity Output and associated costs budget against actual Output and associated costs drawdown (2017-2020).



Figure 2 illustrates that, although there was limited expenditure in the start-up year, 2017, Activity expenditure in 2018 approached 80 per cent of the annual budget for that year. Activities under the SPL fell off dramatically in 2019 because of the breakdown of discussions among the TKA concerning zone-based allocations. This impacted Outputs 2, 3 and 5. This was compounded in 2020 when COVID materialised at the end of the first quarter; a situation that has persisted through 2021. Expenditure to date for Output 2 is 8 per cent of total expenditure to date (NZ\$1,776,285), Output 3 (8 per cent) and Output 5 (4 per cent). With COVID persisting through 2021, a total of \$2.557 million of the original budget was unexpended against these three Outputs at the start of 2021 (**Table 1**).

SPC's support to Outputs 1 and 4 was largely maintained through this period reflecting the analytical nature of SPC's contributions which was sustained from their Nouméa offices. The inability to support in-country face-to-face engagement adversely impacted scheduled activities relating to policy and regulation review (Output 3, FFA implemented), training (Output 5, both SPC and FFA implemented) and SPC's efforts to test prototype applications, such as those associated with specific zone-based analysis and catch visualisation (Output 1 and 4).

In terms of outlook, although a 'return to normal' is unlikely in the first half of 2022, in the latter half of the year, there should be an improvement in opportunities for face-to-face engagement in activities such as meetings and workshops or during in-country visits by Activity-affiliated personnel.

In addition, financial resources may be required because of the extension of the Activity to all FFA PIC members with an interest in South Pacific Albacore as opposed to being confined to the TKA Arrangement FFA PIC members provided for in the ADD. However, the SPLL Activity is currently programmed to conclude in February 2022 (3 months after the MTR!). To date there have been no discussions regarding whether the termination date will be adhered to or another arrangement, such as a no-cost extension, be considered.

The MTR is of the view that, given the significance of the South Pacific Albacore to the fisheries of FFA PIC members, and on-going issues associated with the management of longline fisheries harvesting SPA, a no-cost extension of 2 years is justifiable. NZ\$5.3 million is available in the Activity budget to support such an extension.

Robust scientific advice and modelling to support future deliberations by FFA PIC members concerning options for the management of the SPC southern longline fishery is critical. The priority issues are projections and options for achieving the TRP and in establishing robust management arrangements, with a focus on zone-based arrangements, including national implications under different management scenarios whether on the basis of catch or effort, extending to the high seas. SPC's support to zone-based arrangements should continue in relation to developing tools for better application of near real-time data (ER and EM) integrated to zone-based catch and/or effort monitoring tools.

On this basis, it is recommended that SPC be invited to prepare a detailed proposal for the application of an additional NZ\$1.5 million towards these efforts (across Outputs 1 and 4) over a 2-year extension of the SPLL Activity. It is recommended that the additional NZ\$1.5 million be sourced from Output 2 (NZ\$200,000), Output 3 (NZ\$500,000) and Output 5 (NZ\$800,000).

FFA should prepare a complementary 2-year programme of work supported by the balance remaining in the Activity; approximately NZ\$3.822 million. Considerable work remains in relation to zone-based management options building on the work undertaken in 2021 by ANCORS under contract to the SPLL.

Catch Documentation and Enhancing Compliance Activity

New Zealand's Ministry of Foreign Affairs (MFAT) is providing up to NZ\$4,929,968 to support the implementation of the Catch Documentation and Enhancing Compliance Activity (CDEC) implemented by FFA in collaboration with SPC. It was originally scheduled to be implemented over 5 years commencing in July 2018 and concluding in October 2023. Two and a half years into the Activity, and with 2.5 years scheduled to run, approximately 17 per cent of the total Activity budget has been committed (to the end of 2020). In addition to the impacts of the pandemic, the limited draw down of funds was partially explained by the fact that activities financed under the PIPSM Activity supported related tasks that would have required CDEC funding in the absence of the PIPSM.

As of the end of 2020, and with limited opportunities to disburse funds for activities in 2021, approximately NZ\$4 million is forecast to remain in the Activity budget (**Table 2**).

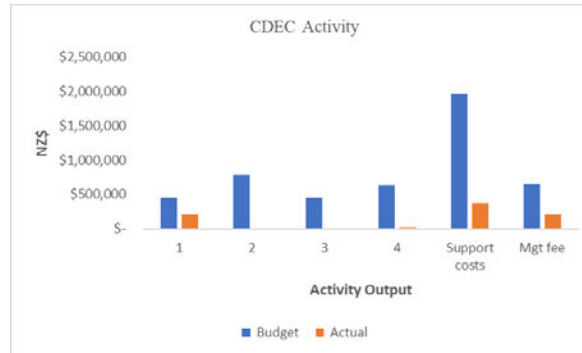
Table 2.

Budget summary for the CDEC Activity showing the original budget allocation against each output and associated costs, actual reported drawdown, the proportional allocation of the total budget to each output and the proportional actual expenditure against each Output and associated cost. It also presents the balance as of the end of 2020. [Output 1. Regional Framework for CDS, 2. National e-CDS strategies and tools, 3. National regulatory and policy frameworks, and 4. Electrically based national and regional tools to implement e-CDS].

CDEC (NZD)					
Output	Budget	Actual	% of budget	% of expenditure	Balance
1	\$ 455,419	\$ 215,833	9%	25%	\$ 239,586
2	\$ 782,937	\$ 4,054	16%	0%	\$ 778,883
3	\$ 450,244	\$ -	9%	0%	\$ 450,244
4	\$ 630,268	\$ 13,883	13%	2%	\$ 616,385
Support costs	\$ 1,968,061	\$ 368,035	40%	43%	\$ 1,600,026
Mgt fee	\$ 643,039	\$ 215,833	13%	28%	\$ 427,206
Total	\$ 4,929,968	\$ 860,611	17%		\$ 4,069,357

As discussed in relation to the SPL Activity, the MTR was advised that it is FFA Secretariat policy to charge 15 per cent against XB funds received as a Management Fee. Based on information provided to the MTR, Management Fees charged in the first two years of the Activity amounted to 12 per cent of the annual budget in 2018 and 10 per cent of forecast budget in 2019. There was no budgeted provision for Management Fees in 2020 or 2021. The Management Fee drawn down was reported to be 12 per cent of total expenditure in 2018, 57 per cent in 2019 and 31 per cent in 2020. The forecast Management Fee for the 2022-23 period was 14 per cent of projected budget.

Figure 3. Summary of the CDEC Activity budget against actual drawdown (2018-2020).



Unlike the SPL Activity, Management Support Fees were budgeted, and drawn down, each year for 2018, 2019 and 2020. This line item was budgeted at 35 per cent, 36 per cent and 48 per cent of Activity budgets in 2018, 2019 and 2020 respectively. For the 5-year life of the Activity, Management Support Fees amounted to 40 per cent of the total budget – **Table 2**). Actual drawdown was reported to be 69 per cent, 6 per cent and 50 per cent of total expenditure for 2018, 2019 and 2020. For a total Activity expenditure of NZ\$860,611 for the period 2018-2020, Management Fees and Management Support Fees amounted to 71 per cent of Activity expenditure (**Table 2** and **Figure 3**). This was explained to provide for monitoring and evaluation activities such as the annual Steering Committee, the MTR and a Completion Report/Terminal Review, the staff costs associated with the CDS Technical Adviser post and SPC costs associated with servicing Outputs 2 and 4.

Figure 4. Summary of the CDEC Activity Output and associated costs budget against actual Output and associated costs drawdown (2018-2020)



Outputs 2,3 and 4 account for 16 per cent, 9 per cent and 13 per cent of total budget forecasts 2018, 2019 and 2020 (**Table 2** and **Figure 4**). Actual total expenditure for each of these Outputs was reported as 0.5 per cent, 0 per cent and 2 per cent respectively to date (noting that SPC's costs against these Outputs was reported to be included with Management Support Fees line item). Approximately NZ\$1.85 million remains in the budget for these three Outputs for the remainder of the Activity.

The CDEC Activity administrator explained that the PIPSM funds have been the primary source of funding support to date because many of the activities supported by the PSM are considered foundational activities for the CDS. In addition, other internal and external sources of funding have

been applied to activities such as legislative reviews, so Activity funds reserved for these activities have been preserved.

As discussed under the SPLL Activity, funds remaining in the CDEC Activity (approximately NZ\$4 million) are unlikely to be fully utilised at the time of the scheduled conclusion of the Activity in October 2023. The MTR recommends a 12-month no-cost extension to the Activity through until October 2024.

A detailed work plan for this period should be prepared by the FFA secretariat and comprehensively reviewed at the next Steering committee.

South Pacific Port State Measures Activity

New Zealand's Ministry of Foreign Affairs (MFAT) is providing up to NZ\$2,661,963 to support the implementation of the Pacific Islands Port State Measures Activity (PIPSM) implemented by FFA. It was originally scheduled to be implemented over 5 years commencing in May 2017 and concluding in May 2022. Approximately 43 per cent of the Activity budget has been committed to the end of 2020, at the completion of three years of a proposed 5-year Activity (**Table 3**).

With limited demands for expenditure during 2021, due to the on-going nature of the pandemic, approximately NZ\$1.523 million is forecast to remain in the Activity budget at the end of 2020 (**Table 3**).

Table 3. Budget summary for the PIPSM Activity showing the original budget allocation against each output and associated costs, actual reported drawdown, the proportional allocation of the total budget to each Output and the proportional actual expenditure against each Output and associated cost. It also presents the balance as of the end of 2020. [Output 1. Framework for PSM, 2. National strategies and implementation tools, 3. Improved national regulatory and governance frameworks, and 4. Training to implement PSM].

PIPSM (NZD)					
Output	Budget	Actual	% of budget	% of expenditure	Balance
1	\$ 333,000	\$ 342,296	13%	30%	-\$ 9,296
2	\$ 722,000	\$ 105,815	27%	9%	\$ 616,185
3	\$ 652,500	\$ 148,628	25%	13%	\$ 503,872
4	\$ 296,000	\$ 46,422	11%	4%	\$ 249,578
Support costs	\$ 311,250	\$ 196,755	12%	17%	\$ 114,495
Mgt fee	\$ 347,213	\$ 298,897	13%	26%	\$ 48,316
Total	\$ 2,661,963	\$ 1,138,813	43%		\$ 1,523,150

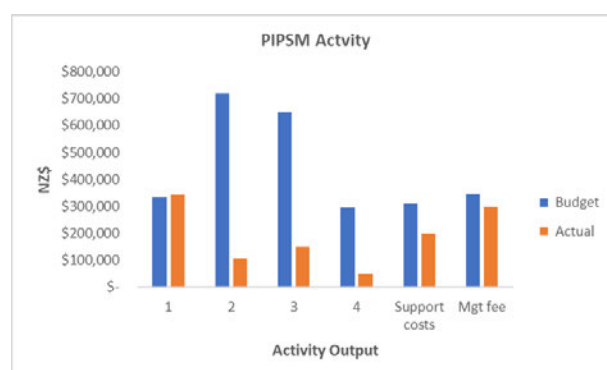


Figure 5. Summary of the PIPSM Activity budget against actual drawdown (2017-2020)



Figure 6. Summary of the PIPSM Activity Output and associated costs budget against actual Output and associated costs drawdown (2017-2020).

As discussed in relation to the SPLL and CDEC Activities, the MTR was advised that it is FFA Secretariat policy to charge 15 per cent against XB funds received as a Management Fee. Based on information made available to the MTR, Management Fees charged in the four years 2017-2020 were budgeted at 13 per cent of the annual budget. No Management Fee was charged to the Activity in 2017. In 2018 a Management Fee amounting to 23 per cent of reported expenditure was incurred. In 2019 it was 21 per cent and in 2020 it was reported as 65 per cent of expenditure.

A budget to provide for Management Support Costs was included in each annual forecast budget ranging between 6 per cent and 17 per cent of total forecast budget. There was no reported drawdown against this provision in 2017. In 2018, this amounted to 20 per cent of total reported expenditure. In 2019 it was 18 per cent and in 2020 it was recorded as 7 per cent of total Activity expenditure.

Management Fees and Management Support Costs represent 43 per cent (NZ\$495,652) of total expenditure for the PIPSM Activity recorded to date.

At the end of 2020, Output 1, which supported a series of consultancies in 2018 and 2019 (review of PSM gaps, preparations of the Regional Framework, risk assessment, market State requirements review), was over-expended by NZ\$9,296. The MTR recommends that NZ\$300,000 be transferred from Output 2 (NZ\$150,000) and Output 3 (NZ\$150,000) to Output 1 to support the following work under Output 1 in the time remaining for the implementation of the Activity which the MTR recommends be extended, at no-cost, to May 2023.

Conclusions

The overall low level of drawdown of Activity funds across all three Activities is partially explained by the impact of the pandemic on Activity activities since early 2020. However, there is evidence that Activity implementation, illustrated by the slow drawdown of funds, was challenged prior to the on-set of the pandemic. A single reason does not explain this but could include:

- *Inadequate region-wide preparedness for activities of this nature:* This is unlikely as the FFA Secretariat, and FFA PIC members, have extensive experience with the implementation of large, complex, multi-country initiatives like these three Activities,
- *Port State measures, catch documentation and South Pacific Albacore are not regional priorities:* The large number of competing initiatives demanding the limited human and financial resources of relatively small national fisheries administrations of FFA PIC members means that issues considered relatively low priority may suffer as a consequence of a simple lack of capacity to effectively engage.
- At the time the three ADDs were drafted in 2016, FFA's 2005-2020 Strategic Plan made no reference to port State measures, catch document schemes, albacore, or longline fisheries. It did provide for significant attention to the development and implementation of appropriate fisheries management arrangements which would apply to ALB. FFA's successor Strategic Plan, for the period 2020-2025, does highlight the importance of support for zone-based fisheries management. It also references support for the development of CDS and, although there's no mention of PSM, efforts to combat IUU fishing are underscored. In addition, FFA's 2018-2023 Regional MCS Strategy includes provisions for supporting CDS and PSM initiatives of FFA members. On this basis, the three Activities do address national and regional priorities identified and agreed by FFA members.
- *High turnover among key staff at the Secretariat:* This issue has possibly impacted Activity implementation more than any other. Although the FFA Secretariat generally experiences a higher turnover of professional staff than other CROP agencies, since 2017 the turnover of staff affiliated with the three Activities has been significant. Staff in positions of Executive Management, Divisional Management, FMAs, MCS Advisers and IT personnel, some with central roles in the initial design, then implementation, of these Activities, have departed the Secretariat. To compound the situation, the recruitment of replacement staff to the FFA Secretariat takes considerable time, even in non-pandemic times.
- *Lack of strategic direction and inter-divisional collaboration within the FFA Secretariat:* Possibly linked to the turnover of key staff, the Activities are perceived by key stakeholders to be lacking strategic direction and required technical skills and experience. In addition, and partly a reflection of the limited strategic direction, cross Agency collaboration involving Fisheries Management, Fisheries Operations and IT has not materialised to the extent required for efficient implementation, at least for the PIPSM and CDEC Activities. The SPLL ADD provided that SPC would provide the analytical and technical development component of the Activity. While some support from SPC was envisaged in the CDEC ADD the PIPSM ADD was based on the required technical support being available within the FFA Secretariat. This has not materialised.

The primary outcome of the Review relates to FFA's Management Fee and Management Support Fees. Data provided to the MTR indicate that there is no consistency in the way these items are budgeted, or expenditure reported. It is recommended that these components of Activity finances be subject to comprehensive review.

Appendix C Evaluation Framework

Data collection for the MTR will be guided by an MTR Matrix to help ensure we capture cited evidence from all sources against the relevant MTR's objectives and questions. The primary focus of the MTR Matrix will be on establishing an evidence base for the SPLL, PIPSM and CDEC to ensure that we systematically build up the evidence base at the very beginning to answer the MTR's key objectives relating to the relevance, coherence, effectiveness, efficiency, and sustainability.

<p>Criterion: Relevance and Coherence</p>	<p>Key MTR questions 1, 5 and 6:</p> <ul style="list-style-type: none"> Is the design of each Activity fit-for-purpose and relevant, including coherent and aligned with strategic and sector priorities both now and into the future?
<p>Proposed working definition for the MTR (adapted from OECD DAC criteria):</p> <p>Relevance: the extent to which the SPLL, PIPSM and CDECs' design and objectives are relevant to beneficiaries' (country, and partner/institutional) changing needs, policies, and priorities, with special consideration to the MFAT's development cooperation strategy of the PICs in line with the Regional Roadmap for Sustainable Pacific Fisheries</p>	
<p>Sub questions</p>	<p>Data sources and data collection methods</p>
<p>Relevance:</p> <ul style="list-style-type: none"> To what extent is the Activity design fit for purpose and relevant to meet its overall purpose and objectives both now and into the future? To what extent are the current activities/outputs/outcomes of each Activity relevant to meet the purpose of the Activity and the strategic and sector priority needs? Are the Activity/s still relevant to current and future strategic priorities? How can the on-going relevance of the Activities be assured moving into the future? How can this be strengthened? 	<p>Document reviews and analysis:</p> <ul style="list-style-type: none"> Regional Roadmap for Sustainable Pacific Fisheries MFAT Development Cooperation Strategy for the PICs FFA's 2020-2025 Strategic Plan Activity Design Documents and Grant Funding Agreements Annual Activity work plans, reports, financial statements, and audits PSC discussion documents and meeting reports Other Activity documentation, such as policies, procedures, and processes <p>Key stakeholder interviews:</p> <ul style="list-style-type: none"> FFA Executive FFA Management Division staff and Activity-affiliated staff SPC Activity-affiliated staff Key personnel in national fisheries administrations and national port authorities serving as national-level partners Staff aware of the Activities in other sub-regional and/or regional fisheries institutions

	<ul style="list-style-type: none"> Representatives of industry who have been engaged through Activity activities Representatives of NGO's that have been associated with Activity implementation activities.
<p>Proposed working definition for the MTR (adapted from OECD DAC criteria):</p> <p>Coherence: The extent to which other interventions support or undermine the intervention, and <i>vice versa</i>. For internal coherence, the focus will be on the extent to which the three projects are consistent and aligned with the current and future priorities of MFAT and FFA. For external coherence, the focus will be on the extent to which the three projects are consistent (complementary, harmonized, coordinated) with the intervention of others in the same context; adding value, while avoiding duplication of effort.</p>	
Sub questions	Data sources and data collection methods
<p>Coherence:</p> <ul style="list-style-type: none"> How does FFA harness support and engagement for each of the three Activity/s? How can the Activities harmonise and coordinate with other activities at regional and national levels to add value, and avoid duplication of effort? How can this be strengthened? 	<p>Document reviews and analysis:</p> <ul style="list-style-type: none"> Regional Roadmap for Sustainable Pacific Fisheries MFAT Development Cooperation Strategy for the PICs FFA's 2005-2020 Strategic Plan and the subsequent 2020-2025 Strategic Plan Activity Design Documents and Grant Funding Agreements Annual Activity work plans and reports Other Activity documentation, such as policies, procedures, and processes <p>Key stakeholder interviews:</p> <ul style="list-style-type: none"> FFA Executive FFA Management Division staff and Activity-affiliated staff Key personnel in national fisheries administrations and national port authorities serving as national-level partners Representatives of industry who have been engaged through Activity activities
<p>Criterion: Effectiveness</p>	<p>Key MTR questions 2, 3, 5 and 6:</p> <ul style="list-style-type: none"> What progress is being made towards achieving the Activity's outputs and short- and medium-term outcomes? How effective has the Activity been? What needs to be done to strengthen the respective Activity's' strategic alignment, design, management, governance, partnerships, and operations now and into the future? <p>Key stakeholder interviews:</p> <ul style="list-style-type: none"> FFA Management Division staff and Activity-affiliated staff

	<ul style="list-style-type: none"> • SPC Activity-affiliated staff • Key personnel in national fisheries administrations and national port authorities serving as national-level partners • Staff aware of the Activities in other sub-regional and/or regional fisheries institutions • Representatives of industry who have been engaged through Activity activities • Representatives of NGOs that have been associated with Activity implementation activities.
Criterion: Efficiency	<p>Key MTR questions 3, 4, 5 and 6:</p> <ul style="list-style-type: none"> • How cost effective is the approach employed to deliver results? • What needs to be done to strengthen the efficiency of the SPILL, PIPSM and CDEC now and into the future?
<p>Proposed working definition for the MTR (adapted from OECD DAC criteria): Efficiency: the extent to which the Activity/s is delivering results in an economic and timely way</p>	
Sub questions	Data sources and data collection methods
<ul style="list-style-type: none"> • Is the resourcing for the implementation of the Activity/s adequate (finances, human resources, equipment and materials, technical capacity) to achieve and sustain its intended results? • Where are the gaps and how can they be addressed? • Is implementation of the Activity/s based on a clear understanding and strategy for achieving results in that context? • Are outputs achieved on time and within budget? • What are the main factors influencing this, and how can they be addressed? • What methods/measure are in place to monitor the implementation and results for each Activity so in-flight adjustments can be made when and if required to improve both the efficiency and effectiveness? • How can this be strengthened? 	<p>Document reviews and analysis:</p> <ul style="list-style-type: none"> • Activity Design Documents and Grant Funding Agreements • Activity Results Frameworks and Measurement Tables • Annual Activity work plans and reports • Other Activity documentation, such as policies, procedures, and processes • Implementing Partners Agreements • Minutes of key meetings • FFA Financial Audit Reports <p>Key stakeholder interviews:</p> <ul style="list-style-type: none"> • FFA Executive • FFA Management Division staff and Activity-affiliated staff • SPC Activity-affiliated staff • Key personnel in national fisheries administrations and national port authorities serving as national-level partners • Staff aware of the Activities in other sub-regional and/or regional fisheries institutions • Representatives of industry who have been engaged through Activity activities

	<ul style="list-style-type: none"> Representatives of NGOs that have been associated with Activity implementation activities.
Criterion: Sustainability	<p>Key MTR questions 5 and 6:</p> <ul style="list-style-type: none"> How cost-effective is the approach employed to deliver results? What needs to be done to strengthen the sustainability of the SPLL, PIPSM and CDEC now and into the future?
<p>Proposed working definition for the MTR (adapted from OECD DAC criteria):</p> <p>Sustainability: the extent to which the net benefits of the Activity/s continue, or are likely to continue, including ownership and political will and an examination of the financial, economic, social, environmental, and capacities of the systems needed to sustain net benefits over time.</p>	
Sub questions <ul style="list-style-type: none"> To what extent has ownership of the Activity's implementation and the outputs and results been achieved? How can this be strengthened? Are the Activities likely to continue after MFAT's support ends? Why/why not? What needs to be done to strengthen the sustainability of the SPLL, PIPSM and CDEC now and into the future? How adequate is the Activities' exit strategy/plan (if in place)? How can it be improved and strengthened? 	Data sources and data collection methods <p>Document reviews and analysis:</p> <ul style="list-style-type: none"> Activity Design Documents and Grant Funding Agreements Activity Results Frameworks and Measurement Tables Annual Activity work plans and reports Other Activity documentation, such as policies, procedures, and processes Implementing Partners Agreements Minutes of key meetings FFA Financial Audit Reports <p>Key stakeholder interviews:</p> <ul style="list-style-type: none"> FFA Executive FFA Management Division staff and Activity-affiliated staff SPC Activity-affiliated staff Key personnel in national fisheries administrations and national port authorities serving as national-level partners Representatives of industry who have been engaged through Activity activities Representatives of NGOs that have been associated with Activity implementation activities.
Thematic issues: gender mainstreaming <ul style="list-style-type: none"> To what extent was the design and implementation of the Activities gender responsive? What were the positive or negative effects of the Activity on gender equality? 	<ul style="list-style-type: none"> Activity Design Documents and Grant Funding Agreements Activity Results Frameworks and Measurement Tables Annual Activity work plans and reports Other Activity documentation, such as policies, procedures, and processes

	<p>Key stakeholder interviews:</p> <ul style="list-style-type: none">• FFA Executive• FFA Management Division staff and Activity-affiliated staff• SPC Activity-affiliated staff• Key personnel in national fisheries administrations and national port authorities serving as national-level partners
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Appendix D Governance, Quality and Ethics

Governance arrangements

The evaluation was governed by an MFAT Steering Group, which ensured the evaluation was fit for purpose and delivered in line with the Evaluation Plan. Key responsibilities included facilitating access to documents and stakeholders; approval of the Evaluation Plan; reviewing the draft Evaluation Report; managing internal feedback on the draft Evaluation Report.

Quality considerations

The evaluation was undertaken by an independent team of four consultants, separate from the officials responsible for policy making and from stakeholders.

The team-based approach, of two evaluators in New Zealand and in-country based evaluators to undertake the field work, allowed for some in-built internal cross-check and quality assurance.

Ethical considerations

The confidentiality of interviews was an area where potential ethical issues may have arisen. The following principles were followed, to mitigate the risk of creating harm among local relationships.

- Informed consent to participate. The interviewee will have the purpose explained and asked if they feel comfortable with participating at the outset. Participants will be informed that the evaluation report will be published. The interview will only proceed if this verbal consent is given and recorded. Personal / identifiable information collected will also be protected.
- Access to notes. Participants will have access to their interview notes if they wish to review their responses.
- Views non-attributable. Our approach for reporting findings is that individual responses from Activity participants will not be attributable. This principle will be made clear at each interview, to encourage participants to share their views freely and to avoid creating harm among local relationships.
- The evaluation team will ensure that access to data and participant details are kept strictly to evaluation team for the purposes of the evaluation only.
- In-country evaluators have been requested to disclose any conflicts of interests (potential or actual) with respect to BLP and the stakeholders being interviewed.

About Sapere

Sapere is one of the largest expert consulting firms in Australasia, and a leader in the provision of independent economic, forensic accounting and public policy services. We provide independent expert testimony, strategic advisory services, data analytics and other advice to Australasia's private sector corporate clients, major law firms, government agencies, and regulatory bodies.

'Sapere' comes from Latin (to be wise) and the phrase 'sapere aude' (dare to be wise). The phrase is associated with German philosopher Immanuel Kant, who promoted the use of reason as a tool of thought; an approach that underpins all Sapere's practice groups.

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