



RFMO APPROACHES TO MEETING PARTICIPATION FEES FOR OBSERVERS AND COOPERATING NON-CONTRACTING PARTIES (CNCPS)

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PURPOSE

To provide the SCAF with feedback on the approaches used in other RFMOs regarding meeting participation fees for observers and CNCPS.

BACKGROUND

In the 2025 report of the SCAF:

*Para 14. The SCAF **REQUESTED** that the Secretariat prepare a document for the next SCAF meeting summarising the approach to meeting participation fees of observers and CNCPS implemented by other RFMOs. The Secretariat was **FURTHER REQUESTED** to assess if those procedures conflict with any FAO protocols.*

It is noted that the IOTC Rules of Procedure state:

***Rule XIV: Participation by Observers. Para 6.** The Commission, on proposal of its Executive Secretary, may decide to request a contribution towards the additional administrative costs arising from the attendance of observers at its Sessions, subject to reciprocity in the case of intergovernmental organizations.*

The current paper provides a summary of approaches from a wide range of RFMOs regarding this issue.

RECOMMENDATION/S

That the SCAF:

- 1) **NOTE** paper IOTC-2026-SCAF23-09 which provided the SCAF with information on the approaches to Meeting participation fees in other RFMOs.
- 2) **CONSIDER** this information and decide whether it could be applied for the IOTC and decide on a process for how the fees would be managed.

1. INTRODUCTION AND OVERVIEW

There is some divergence in how Regional Fisheries management Organizations (RFMOs) handle the financial aspects of participation for non-members:

- **The "User-Pays" Model:** These organizations charge a mandatory registration fee (a "ticket price") for Observers (NGOs/IGOs) to attend annual meetings. This fee is intended to offset the administrative costs of their participation (venue, catering, technology).
- **The "Open Access" Model:** These RFMOs do not charge a meeting fee for accredited Observers. Participation costs are limited to the observer's own travel and accommodation.

In most cases Cooperating Non-Contracting Parties (CNCs) are treated differently than NGOs. They usually do not pay "meeting fees" but may instead be required to make annual budgetary contributions (voluntary or assessed) proportional to their status, wealth, or catch. This contribution secures potential fishing rights and cooperating status.

2. BREAKDOWN BY RFMO

A) ICCAT (International Commission for the Conservation of Atlantic Tunas)

- **Observers (NGOs):**
 - Observers will be required to pay a fee for their participation at the meetings of the Organization, which will contribute to the additional expenses generated by their participation, as determined annually by the Executive Secretary (*Document 05-12, Guidelines and Criteria for Granting Observer Status at ICCAT Meetings*). IGOs are not charged. The following fees are applied to non-party and NGO observers: \$500 USD for the first two registrants; \$350 USD for subsequent registrants. And a limit of 3 participants (*IOTC Executive Secretary pers. comm.*).
- **CNCs:**
 - CNCs are assessed a financial contribution to the Commission's budget but are not charged fees for meeting attendance. ([link](#))

B) CCSBT (Commission for the Conservation of Southern Bluefin Tuna)

- **Observers (NGOs).**
 - The CCSBT allows observers from non-member states, IGOs, and NGOs to attend the Extended Commission meetings. There is no standard administrative fee charged for admission.
- **CNCs (CNM – cooperating non-member, in CCSBT):**
 - CNMs must comply with the decisions of the CCSBT, but they are not required to provide financial contributions to the CCSBT and may attend meetings ([link](#)).

C) WCPFC (Western and Central Pacific Fisheries Commission)

- **Observers (NGOs).**
 - **In-Person Fee:** \$500 USD for the first two registrants; \$350 USD for subsequent registrants.
 - **Virtual Fee:** Approximately \$250 USD for the first registrant; \$150 USD for subsequent registrants (*WCPFC Executive Director pers. Comm.*).
- **CNMs:**

- CNMs are expected to make financial contributions to the budget. The Commission assesses these contributions based on the CNM's ability to pay and their benefits from the fishery. ([link](#)) CNMs may attend meetings regardless of payment although the payment affects their continued status as CNMs (*WCPFC Executive Director pers. Comm.*)

D) IATTC (Inter-American Tropical Tuna Commission)

- **Observers (NGOs):**

- Paragraph 10 of Annex 2 of the [Antigua Convention](#) states: *The Director may require non-Party and NGO observers to pay reasonable fees, and to cover costs attributable to their attendance.*
- The Commission has long maintained a policy of requiring NGOs to contribute US\$500 per meeting of the Commission, and this has been understood to include entire cycles of meetings that may take place on one or more consecutive days and even up to two weeks ([link](#)).
- *Note:* Proposals regarding "NGO Fees" have appeared in recent meeting agendas (e.g., 2024/2025), suggesting this policy is currently under active discussion by the Heads of Delegation ([link](#)).

- **CNMs:**

- Cooperating Non-Members (CNM) may participate in the meetings of the Commission as observers.

E) NEAFC (North East Atlantic Fisheries Commission)

- **Observers (NGOs):**

- The Rules of Procedure Para 38 states: If additional expenses are incurred by their participation, observers will be required to pay a fee, as determined by the Secretary. Para 39: The Secretary will determine whether, due to conference room capacity, seating limitations require that a limited number of observers may be present at any meeting. The Secretary will transmit any such determination in the conditions of participation ([link](#)). To date, fees have not been charged, but this is being discussed by some members (*NEAFC Secretary pers. Comm.*)

- **CNCPs:**

- CNCPs are treated the same as observers with regards to meeting participation fees, but they are charged a fee for participation in Commission matters (*NEAFC Secretary pers. Comm.*).

F) NAFO (Northwest Atlantic Fisheries Organization)

- **Observers (NGOs/IGOs):**

- The NAFO Rules of Procedure (Rule 5 of Rules of Procedure for Observers to NAFO Meetings (Commission and Scientific Council)) b) may be required to limit the number of their observers at any meeting due to conference room capacity. The Executive Secretary will transmit any such determination in the conditions of participation; c) may be required to pay a fee, which will cover the additional expenses generated by their participation, as determined annually by the Executive Secretary." ([link](#))
- On the fees for observers NAFO have the following amounts set in 2025, which might change in 2026 (*NAFO Executive Secretary Pers. Comm.*)

NAFO Annual Meeting	\$75.00
Scientific Council	\$100.00

Working Groups

1-4 Days	\$50.00
5 Days	\$75.00
6+	\$100.00

The amounts reflect that the Annual Meeting is 4-5 days and the Scientific Council 10 days. The rationale is to have a minimal cost recovery for coffee and other direct cost.

- **CNCPS:**

- CNCP payments are not explicitly mentioned but they may be invited as observers according to Rule 1, para b of Rules of Procedure for Observers to NAFO Meetings (Commission and Scientific Council).

G) SEAFO (South East Atlantic Fisheries Organisation)

- **Observers (NGOs):**

- Observer participation is governed by the Rules of Procedure. There is no stipulated registration fee for attending the annual Commission meetings. ([link](#))

- **CNCPS: Annual Budgetary Contribution.**

- CNCPS are not explicitly mentioned regarding meetings apart from in Article 8 para 6 of the convention which states: The Commission shall adopt rules of procedure to govern the participation of representatives from non-Parties to this Convention as observers ([link](#)).

H) SIOFA (Southern Indian Ocean Fisheries Agreement)

- **Observers (NGOs): No Meeting Fee.**

- SIOFA allows for the participation of observers (States, IGOs, NGOs) under Part X Rule 18 of the Rules of Procedure for the Meetings of the Parties. There is no registration fee mechanism currently implemented for these groups. ([link](#))

- **CNCPS:**

- Article 14 of the SIOFA Agreement in para 3 notes: Non-Contracting Parties to this Agreement shall be entitled to participate as observers in the Meeting of the Parties and meetings of its subsidiary bodies. As such they are subject to the conditions above. ([link](#))

I) SPRFMO (South Pacific Regional Fisheries Management Organisation)

- **Observers (NGOs):**

- SPRFMO has a transparent observer accreditation process outlined in Article 18 of the SPRFMO Convention ([link](#)). Observers attend meetings at their own cost but do not pay a fee to the Secretariat. Proposals to implement an observer fee have been made in recent years but have yet to be adopted ([link](#))

- **CNCPS:**

- Article 18 Para 4 of the SPRFMO Convention notes: Representatives of non-Contracting Parties, relevant intergovernmental organisations and nongovernmental organisations, including environmental organisations and fishing industry organisations with an interest in matters pertaining to the Commission shall be afforded the opportunity to take part in the meetings of the Commission and of its subsidiary bodies, as observers or otherwise as appropriate. ([link](#))

J) GFCM (General Fisheries Commission of the Mediterranean)

- **Observers (NGOs):**
 - Article 12 paragraph 6 of the Agreement for the Establishment of the General Fisheries Commission for the Mediterranean states: Expenses incurred by delegates, their alternates, experts and advisers when attending, as government representatives, sessions of the Commission and its subsidiary bodies, as well as the expenses incurred by observers at sessions, shall be borne by the respective governments or organizations. In recognition of the special requirements of developing States Contracting Parties, according to Article 17 and subject to the availability of funds, the expenses could be borne by the budget of the Commission ([link](#)). No fee is charged for participating in meetings.
- **CNCs:**
 - CNCs may be invited to GFCM meetings but no charge is incurred for their attendance.

3. SUMMARY TABLE OF RFMO MEETING PARTICIPATION PRACTICES

RFMO	NGO Observer fee	CNCP/CNM fee
ICCAT	Yes	No
CCSBT	No	No
WCPFC	Yes	No
IATTC	Yes	No
NEAFC	No	No
NAFO	Yes	If classified as observers
SEAFO	No	No
SIOFA	No	No
SPRFMO	No	No
GFCM	No	No

4. POSSIBLE CONFLICT WITH FAO PROCEDURES AND PROTOCOLS

It is clearly stated in the IOTC Rules of Procedure, Rule XIV Para 6: *The Commission, on proposal of its Executive Secretary, may decide to request a contribution towards the additional administrative costs arising from the attendance of observers at its Sessions, subject to reciprocity in the case of intergovernmental organizations.*

The Rules of Procedure are communicated to the FAO legal department whenever revisions or amendments are made. Most recently this was done in 2025. The response from the FAO Legal Department was “... *from a strictly legal perspective, we would not have any objections to the amendments already agreed by the Commission*”. As such, it could be assumed that the Rules of Procedure do not conflict with FAO procedures and protocols and therefore the above-mentioned Rule could be applied. The FAO legal department provided a response which is included as Annex I.

5. CONCLUSIONS

Requiring observers to pay fees to attend official IOTC meetings has both advantages and disadvantages. Advantages are that attendance fees can help offset administrative costs, such as venue services (coffee breaks/water), security, and documentation, reducing the financial burden on the IOTC budget. Fees may also discourage casual attendees, helping ensure in-person participants are dedicated to contributing positively to the outcomes of the meetings. However, the impact on the budget of receiving fees may be considered minimal and charging observers could potentially limit transparency and public participation, particularly for individuals or groups with limited financial resources, although they would still be able to participate online during IOTC’s hybrid meetings. This may create barriers to external engagement and reduce trust in some of IOTC’s decision-making processes.

A mechanism would need to be agreed on how to administrate the fees paid by observers. Possible options could include for these to be paid into the IOTC Working Capital Fund as voluntary contributions. Alternatively, they could be paid into the IOTC Meeting Participation fund providing additional resources for member country attendance at meetings. Other options should also be discussed and agreed should this matter be pursued.

Overall, while fees can support efficient meeting management and reduce cost burdens for hosting physical meetings, they also risk undermining openness and inclusivity if not carefully implemented.

ANNEX I – FAO Legal response regarding Observer Fees

From a strictly legal perspective, we note that requesting “*a contribution [from observers] towards the additional administrative costs arising from [their] attendance [...] at [IOTC] Sessions*” would be permissible under the IOTC Rules of Procedure (“RoP”). Notwithstanding this, from what we understand based on the clarifications you kindly provided, these “*administrative costs*” refer to hospitality costs and amounts attributable to observers which are nominal.

Given that the IOTC may decide to request such contributions “*on proposal of its Executive Secretary*” we would invite you to carefully assess – especially from policy and political perspectives – whether it would be worth triggering Rule XIV, paragraph 6 of the IOTC RoP in light of, among other things, the following:

- a possible deterrent effect, bearing in mind that there will presumably be observers whom the IOTC would want to attend;
- potential political difficulty in perceived unequal treatment across the board given that, to our knowledge, it does not appear that any other FAO Article XIV body or Governing Body seems to request such contributions;
- internal administrative costs in processing such observer contributions in all likelihood outweighing the contributions themselves;
- the IOTC having to draw on its own assessed autonomous budget to attend, as an observer, sessions of observer international governmental organization (IGOs) due to the reciprocity clause in Rule XIV, paragraph 6 of the IOTC RoPs; and
- the IOTC never having previously requested such contributions, per your earlier confirmation.