



CCSBT-CC/2410/13

Report on the Indonesian Trial At-sea Transshipment Observer Programme

1. Introduction

The [*Resolution on Establishing a Program for Transshipment by Large-Scale Fishing Vessels*](#) was revised in 2023 at CCSBT 30¹ to allow Indonesia to use their own national observers to monitor SBT transshipments at sea to specified wooden Indonesian-flagged Carrier Vessels for a two-year trial period. The purpose of this paper is to report back to CC19 on the monitoring of Indonesia's trial at-sea transshipment observer programme obligations since the trial period commenced on 1 November 2023.

2. Background

Indonesia submitted a 'Proposal for Amendment of Resolution on Establishing a Program for Transshipment by Large-Scale Fishing Vessels' to the Eighteenth meeting of the Compliance Committee (CC18). The proposal sought to amend the Transshipment Resolution to allow Indonesia's national observers to be used on a limited number of vessels to meet transshipment requirements. Indonesia clarified to CC18 that IOTC regional observers cannot be placed on wooden Indonesian vessels since these vessels do not meet minimum health and safety standards that are required by the programme provider and that the proposed amendments to the Resolution would align with the pilot project agreed at IOTC.

CC18 agreed to recommend a two-year trial that would include a targeted Quality Assurance Review (QAR) to independently assess the performance of the trial. This recommendation was endorsed at Extended Commission of the Thirtieth Annual Meeting of the Commission (EC30), and the trial commenced on 1 November 2023.

3. Secretariat Monitoring Processes

The Secretariat is securely storing all information received from Indonesia related to the transshipment trial and has established spreadsheets to monitor transshipment activity and assess compliance with the obligations of the Transshipment Resolution. The monitoring processes had to be established quickly following CC18 and continue to be refined to ensure that this activity can be monitored as effectively as possible.

As required in the Transshipment Resolution, the Secretariat has been receiving directly from Indonesia the following data and information:

- Deployment Requests including evidence of the observers experience and training.
- Daily reports of the Carrier Vessel's transshipping activities transmitted as a summary every 5 days (5-day reports).
- Transshipment Declarations for completed transshipments involving SBT.
- Observer Reports where the trip included transshipment involving SBT.

However, the receipt of this information has, thus far, been inconsistent.

¹ Through the insertion of Paragraphs 13 to 16 inclusive into the Resolution.

4. Level of Transshipment Activity

From the time the trial commenced on 1 November, through to those deployment requests received that specify a carrier vessel departure date before 1 July 2024 (eight-month total timeframe), the Secretariat received 79 deployment requests that included a total of 718 planned transshipments.

This has significantly increased the transshipment data and information being received and managed by the Secretariat and the transshipment activities that require monitoring.

5. Summary of Records Provided to the Secretariat

Of the 79 deployments and 718 planned transshipments during this period, the Secretariat has received:

- Transshipment Declarations for 239 transshipments.
 - Of the remaining 479 planned transshipments, 63 were confirmed² to have not involved the transshipment of SBT, leaving 416 transshipments unaccounted for and for which no Transshipment Declaration has been received.
- Observer reports covering 282 transshipments.
 - Removing the 63 transshipments not involving SBT leaves 373 transshipments unaccounted for and for which no observer reports have been received.
- 5-day reports related to 55 of the 79 deployments.
 - However, there are significant gaps in this data, with reports missing for most deployments that have occurred through this period.

The missing data makes it very difficult to account for actual quantities transhipped and to reconcile the transshipment data received across different sources of information (e.g. reconciling transshipments declared on CMFs with those reported through observer documentation provided).

Under the Transshipment Resolution, the following data and report submission requirements are specified:

- The receiving carrier vessel is required to transmit the CCSBT transshipment declaration to the CCSBT Secretariat and Indonesian Authorities, within 24 hours of the completion of the transshipment; and
- Observer reports are required to be submitted to the Secretariat within 20 days from the end of the period of observation.

Of the 79 deployments and 718 planned transshipments:

- Transshipment declarations, where received, have been received, on average, 53 days after the date of the transshipment; and
- Observer reports, where received, have been received, on average, 38 days after the expected date of arrival in port.

Therefore, to date, Indonesia has not submitted all the data and information required under the Transshipment Resolution, and where data and information is submitted, this is almost always submitted outside of the required submission period specified in the Resolution.

Tables one and two below provide a summary of the data received to date, both in terms of the number of documents and the SBT weights specified on these documents. These tables examine the period of 1 November 2023 to 31 March 2024, noting that only first quarter CDS data is required to have been submitted to the Secretariat at the time of writing this paper.

² Confirmed through transshipment or related documentation received from Indonesia.

Table One: Summary of Required Indonesia Transhipment Documents Received by Month

TS Month & Year	(1) Transhipments from Observer Deployment Requests	(2) Transhipments Accounted for in Transhipment Declarations Received	(3) Transhipments Accounted for in Observer Reports Received	(4) Transhipments Accounted for in Associated ³ CMFs	(5) CMFs Recording Transhipments unable to be associated with a Transhipment
Nov-23	64	10	29	13	132
Dec-23	72	25	31	19	19
Jan-24	116	45	46	34	73
Feb-24	111	19	19	17	60
Mar-24	82	50	50	46	14
Grand Total	445	149	175	134	298

Table Two: Summary of SBT Weights Specified in Required Indonesia Transhipment Documents Received by Month

TS Month & Year	(1) Reported Weight from Transhipment Declarations Received (kg)	(2) Reported Weight from Observer Reports Received (kg)	(3) Reported Weights from Associated CMFs Received (kg)	(4) Reported Weights from CMFs Reporting Transhipments but Unable to be Associated (kg)
Nov-23	2,840	14,790	5,521	48,734
Dec-23	33,278	34,397	70,012	11,090
Jan-24	116,740	111,543	102,219	55,939
Feb-24	17,953	17,953	16,188	60,926
Mar-24	47,173	47,407	45,890	8,074
Grand Total	217,984	226,090	241,965	184,763

³ CMFs are associated with transhipment activities through carrier and fishing vessel identities and the date of transhipment. The missing transhipment documentation may mean that many CMFs have not been able to be associated due to not receiving a confirmed date of transhipment. Where all data is complete and submitted, all CMFs should be able to be associated with a transhipment declaration and the number of transhipment declarations should match the number of transhipments recorded on CMFs. For comparison, transhipment records provided through the CCSBT Regional Observer Program discussed in paper CCSBT-CC/2410/08, and data submitted is summarised in the tables in the attachment to this paper.

6. Impacts on the Work of the Secretariat

As noted earlier in the paper, the implementation of Indonesia's trial at-sea transshipment observer programme has seen a significant increase in the amount of transshipment data and information being received by the Secretariat and the work required by Secretariat staff to monitor these activities.

In 2023, 117 planned transshipments were notified to the CCSBT Secretariat across all other CCSBT Members (except Indonesia). These planned transshipments resulted in 60 transshipment declarations being received by the Secretariat for confirmed transshipments of SBT. Therefore, the addition of the transshipments notified to the Secretariat through Indonesia's transshipment trial to date (719 for deployment requests leaving port up to the end of June) represent a more than 700% increase in the transshipment data and information being received by the Secretariat over an eight-month period.

7. Summary

CC19 is invited to:

- Review the summary of data and information submitted to date as part of Indonesia's trial at-sea transshipment observer programme;
- Note that, currently, Indonesia is not fully meeting the obligations of the Transshipment Resolution, including requirements relating to the two-year observer trial; and
- Consider the increased workload on the Secretariat as a result of the extra data and information being received.

Prepared by the Secretariat