



CCSBT–CC/2510/06

Review of Implementation of Indonesia's and South Africa's Corrective Actions & Indonesia's Compliance in 2024

1. Introduction

The purpose of this paper is to review the implementation of agreed corrective actions as well as the related compliance of those Members that are undertaking these corrective actions.

1.1 Corrective Actions

CCSBT's Corrective Actions Policy (CPG3) sets out a framework to respond to evidence of non-compliance by a Member, including SBT catch in excess of annual catch limits. The primary response focus of CPG3 is to assist Members to achieve capacity to effectively comply with CCSBT obligations.

Under CPG3, Member non-compliance is assessed by the Compliance Committee, which then recommends actions to the Commission. CC19 noted the following points related to the recommended corrective actions which were endorsed at CCSBT31:

- *The meeting agreed to recommend that the EC continue its support for the payback plan for Indonesia (**Attachment A**).*
- *South Africa agreed to provide its Corrective Action Plan to address areas of non-compliance no later than 31 December 2024.*
- *That both Indonesia and South Africa had areas of non-compliance in 2023, corrective actions will need to be taken by both Members to address these - Indonesia via the targeted QAR and South Africa via its renewed commitment to provide a Corrective Actions Plan prior to 31 Dec 2024.*

This paper examines the progress that has been made against these agreed ongoing corrective actions for Indonesia and South Africa. It also examines the compliance of these Members in areas specifically related to the identified corrective actions.

1.2 Corrective Actions

CCSBT 30 agreed to provide a special temporary allowance of 130t to Indonesia per year from 2024 to 2026 inclusive. CCSBT 30 also agreed that this special temporary allowance would be subject to an annual review of Indonesia's compliance undertaken at the Compliance Committee and also reserved the ability to revoke or reduce the temporary

allowance¹. CCSBT 30 noted the annual review of compliance would include evaluation of performance against obligations, including in areas such as catch against allocation, transshipment, CDS, management of small-scale fisheries, data exchange requirements, and observer requirements². To help formulate the Compliance Committee's advice to CCSBT 32, an update on Indonesia's implementation of its payback and management plans is provided in Section 2 of this paper, and a brief summary of Indonesia's compliance in 2024 is provided in Section 3.

2. Update on Indonesia's Implementation of its Payback and Management Plans

2.1 Background

Indonesia's reported SBT catch exceeded its Total Available Catch³ in both its 2019 and 2020 fishing seasons⁴. Indonesia's combined 2019 and 2020 over-catch was 456.584t. CCSBT 27⁵ agreed an initial Payback Plan for Indonesia to repay its over-catch at a rate of 91.8t per year between 2022 to 2026 inclusive. In 2021, Indonesia had a small under-catch (of 0.085t) and a revised Payback Plan was subsequently agreed by CCSBT 28⁶ (**Attachment A**) for Indonesia's over-catch to be repaid at a slightly reduced rate of 91.3t per year between 2022 to 2026 inclusive.

2.2 Update on Indonesia's Reported Catch (2024 and 2025)

With regards to the implementation of Indonesia's Payback Plan (**Attachment A**) the Secretariat reports that:

2024 Season

After taking into account its 2024 payback instalment (91.3t), Indonesia's Total Available Catch for 2024 was 1,244.7t⁷. Indonesia's reported catch of SBT for 2024 was 1,224.38⁸. This is 20.32t below its Total Available Catch for 2024. There is a slight difference when compared with catch tagging data for 2024, but the difference in the number of SBT is only one SBT (12755 on CTF data vs 12754 on reported catch by vessel).

2024 – Indonesia (as at 31/08/2025)	Unit: Tonnes ⁹
A. Total Available Catch	1,244.70

¹ Paragraph 85 of EC30's report

² Paragraph 86 of EC30's report

³ Total Available Catch means a Member's Effective Catch Limit allocation for that quota year plus any amount of unfished allocation carried forward to that quota year; Effective Catch Limit means the Member's National Allocation plus or minus any agreed short-term changes to that allocation, for example temporary transfers.

⁴ Indonesia's fishing season starts on 1 January and ends on 31 December

⁵ Refer to Attachment 8 of the 27th Meeting of the Extended Commission (EC 27's) [report](#)

⁶ Paragraphs 69 and 75 of EC28's [report](#)

⁷ Calculated by taking Indonesia's Effective Catch Limit for 2024 (1,336t) and then subtracting Indonesia's payback for 2024 (91.3t), resulting in 1244.7t of Total Available Catch for 2024.

⁸ Taken from Indonesia's monthly catch reports submitted for 2024.

⁹ Whole weight

B. Reported Catch – Catch by Vessel	1,224.38
C. Reported Catch – CTF Data	1,224.63

In the last two years, Indonesia has started reporting a small amount of artisanal catch. This followed Indonesia stating at CC18 that:

“Some of the small-scale fishers are members of the fishing associations however new information available this year has identified SBT landings in other ports caught by small fishers are not currently included in CDS data but are catching small quantities of fish.....”¹⁰

Prior to CC19, Indonesia confirmed that this catch by small-scale fishers had been included in 2023 CDS data submitted to the Secretariat, referencing 17 SBT landed by small-scale fishers at Pondokdadap, East Lombok (Labuan Lombok) and Cilacap between January and November 2023. Tagging data related to this catch was received in March 2024 and Catch Monitoring Forms were submitted in August 2024 (up to 19 months after the SBT were harvested).

In 2024, Indonesia has again reported a small quantity of SBT landings (13 SBT, estimated whole weight 1248kg) at Pondokdadap, East Lombok (Labuan Lombok) and Cilacap by small-scale fishers. The catch tagging data related to this catch was received in February 2025 and relates to SBT harvested between April and November 2024. At the time of writing, Catch Monitoring Forms related to this catch have not been received by the Secretariat.

2025 Season

According to reported monthly catches submitted for January to July 2025 inclusive, Indonesia’s total reported SBT catch for 2025 is currently 208.93t. Therefore, to date, Indonesia’s reported 2025 SBT catch currently remains within its 2025 Total Available Catch Limit of 1,244.7t (Table 1). However, this total only includes catch reported up until, and including July 2025. Indonesia also notified the Secretariat on 31 July 2025, that “due to an ongoing transitional phase in the national quota distribution mechanism, we are currently in the process of consolidating data in coordination with tuna industry associations and business operators” so there was “no data we can submit for June 2025”. The June catch report was later updated at the end of August 2025 to 4.76t, and a zero monthly catch report was submitted at the same time for July 2025. The notification received from Indonesia at the end of August 2025 also indicated that the “data would be updated in the near future” and that the “catch of SBT of 2025 is temporary figure”. Indonesia did also submit catch tagging data for July 2025 at the same time. Therefore, it seems very likely that these 2025 catch figures will increase however, given the lower catches reported to date in 2025, there is no indication that there is currently a high risk of Indonesia not staying within its 2025 Total Available Catch

¹⁰ See paragraph 29 of the Report of the 18th Meeting of the Compliance Committee, 2023

Limit of 1,244.7t. But it is currently unclear how much the “ongoing transitional phase in the national quota distribution mechanism” is still impacting Indonesia’s 2025 catch reporting.

Table 1

2025 – Indonesia (as at 31/08/2025)	Unit: Tonnes¹¹
A. Total Available Catch (t ¹¹)	1,244.70
B. Reported Catch (t ¹¹) – up until 31 July 2025	208.93
Difference (A - B) (t¹¹)	1035.77

2.3 Indonesia’s Work Plan to Remain Within Allocation

At the time of writing an updated workplan had not been provided by Indonesia. [Indonesia’s workplan to remain within its TAC for 2024](#) (submitted to CC19) also did not specify any ongoing specific work occurring during 2025. The paper will be updated if a new or updated workplan is received from Indonesia.

2.4 Summary of Indonesia’s Compliance During 2024

The delays in receiving tagging data and Catch Monitoring Forms discussed in Section 2.2 are not specific to artisanal catch, with some tagging data received from Indonesia certified up to twelve months after the SBT is harvested. The CDS Resolution (Paragraph 4.2) requires that the Catch Tagging Form shall be filled in as soon as practicable after the time of kill. The Secretariat has sought clarification from Indonesia on several occasions on the reason for these delays in certifying tagging data but has yet to receive a response. Delays in certification of tagging data can be expected where vessels are at sea for long periods and a long way from port. However, in these cases the vessels often appear to be smaller vessels and vessels that are, or are able to, tranship regularly. The table below provides a summary of the certification month and harvest.

	Timing of Certification				
	Same month as harvest	Month following harvest	Two months after harvest	Three to six months after harvest	Six to twelve months after harvest
Percentage of Total SBT Tagged	15%	55%	23%	4%	3%

An additional area of concern in relation to Indonesia’s compliance during 2024 is the overutilisation¹² of SBT landed on CMFs detected on REEFs submitted by Indonesia. As

¹¹ Whole weight

¹² The CDS Resolution defines this as “where subsequent exports/re-exports of fish from the CMF have exceeded the original quantity of fish reported on the CMF”.

shown in **Attachment B** to this paper, there were 145 REEFs issued by Indonesia in 2024 where overutilisation has been identified in reported figures¹³ (which accounts for around 20% of the total REEFs issued by Indonesia in 2024). **Attachment B** only contains those REEFs where the reported quantities (which were always further processed) exceeded or closely matched¹⁴ the weight on the CMF. The Secretariat identified other REEFs where overutilisation was strongly suspected¹⁵, however, these cases have not been included in Attachment B because there is no agreed CCSBT conversion factor than can be applied to the processed states reported in these REEFs. Given the approach used by the Secretariat, it is therefore likely that the number of REEFs where overutilisation has actually occurred is higher than the 145 REEFs issued in 2024 that have been included in Attachment B.

Without applying a conversion factor to the quantities reported, the REEFs in Attachment B represent a total of 126 tonnes more SBT by weight, than is reported in the preceding CMF. This difference would increase significantly if conversion factors were applied to the reported quantities.

Below is an example of the overutilisation identified which is based on actual transactions but has been anonymised for this report.

Date	Document Reference	Activity	Location
May 2024	CMID24 – 25	Landing of 55 SBT total weight 5121 kg	Bali
Aug 2024	REID24 – 131	Reported export of Saku with the REEF noting 55 SBT and a total weight 3460 kg. Preceding document reported as CMID24 – 25.	Bali
Oct 2024	REID24 – 132	Reported export of Saku with the REEF reporting a total weight 2700 kg. Preceding document reported as CMID24 – 25.	Jakarta
Oct 2024	REID24 – 133	Reported export of Saku with the REEF reporting a total weight 1261.36 kg. Preceding document reported as CMID24 – 25.	Bitung, Sulawesi
Summary	Three exports from three different locations in Indonesia totalling 7421.36kg Saku, all recording the same preceding document that reported 5121kg GGO. Without applying any conversion factor, the quantity reported in the REEFs exceeded the CMF total by 2300.36kg.		

The Secretariat had not produced reports on REEF overutilisation in previous iterations of the CDS reports since 2014. This is due to challenges in reconciling where more than one document may be referenced in REEFs and/or where exports may occur across different

¹³ There were also 14 REEFs issued in 2023 that contributed to the reported overutilisation in 2024. REEFs issued in 2023 were not checked for overutilization, except in cases where the REEFs were identified to contribute to the overutilisation reported on 2024 REEFs.

¹⁴ Closely matched means the weight reported on REEFs was less than the CMFs by less than 12% or less.

¹⁵ Because the weight of SBT reported on REEFs reflected a recovery rate well above that which would be expected (based on a comparison with other REEFs provided by ID where overutilisation was not evident).

fishing seasons¹⁶ and challenges still remain in completing analysis of REEFs in certain circumstances. However, the Secretariat has again commenced this reporting, with the first report compiled in the CDS reports sent to Members in December 2024. Prior to sending this report to Members, the Secretariat notified Indonesia of the issues that had been identified and provided examples of the overutilisation on REEFs. No response was received to this communication. The Secretariat has again followed up with Indonesia during 2025 and Indonesia has responded on 7 August 2025 stating:

“With regard to the issue of REEFs accounting for more SBT than what was landed on the preceding CMF, we are still in the process of investigating this matter further. We will provide an explanation as soon as our internal review is complete.”

At the time of completing this paper, no further information has been provided to the Secretariat.

In relation to the broader obligations in the CDS Resolution, Indonesia had been non-responsive to Secretariat outreach on the issues identified in the quarterly CDS reconciliation reports. However, Indonesia responded to the identified 2024 CDS reconciliation issues on 7 August 2025 and almost all the identified issues have now been resolved. One export REEF remains outstanding and as noted earlier in the paper, at the time of writing, Indonesia have not submitted catch monitoring forms related to SBT harvested by small scale vessels (13 SBT in total) that was caught between April and November 2024.

In 2024, the Secretariat reported to CC19 on the issues related to Indonesia’s implementation of the 2-year trial at-sea transshipment programme using national observers¹⁷. A Quality Assurance Review (QAR) has been completed and this, along with the Secretariat’s report on the programme are included in paper [CCSBT-CC/2510/012](#). Therefore, a detailed analysis of the compliance will not be included in this paper. However, whilst overall there has been improvement in Indonesia’s compliance with the obligations included in the Transshipment Resolution, compliance issues remain, particularly around the completion and provision of the required reporting and notifications and the training of observers. There are also concerns remaining with regards the ability of the current programme to provide an independent assessment of SBT transhipped and this is further discussed in papers [CCSBT-CC/2510/12](#) and [CCSBT-CC/2510/21](#).

2.5 Conclusion Regarding Indonesia’s Corrective Actions and Compliance

Indonesia’s reported catch in 2024 was again close to, but remained below, its allocation (approximately 20t below). A small amount of artisanal SBT catch has again be reported, but this data was received a significant time after the SBT was reportedly harvested. Indonesia

¹⁶ This issue was outlined in Circular #2013/063 with a proposed solution, but there was not agreement to the solution proposed.

¹⁷ Paper [CCSBT-CC/2410/13](#).

has confirmed in their [national report to CC19/CCSBT31](#) that there may be catch from other sectors, such as recreational or other artisanal fishing, but that monitoring had not been conducted on these sectors in 2023. The uncertainty surrounding artisanal catch and the continued issues related to the overutilisation of SBT on REEFs make it impossible for the Secretariat to confirm that Indonesia's catch has remained within its total allocation during 2024.

3. Update on South Africa's Corrective Action Plan to Address its Non-Compliance

3.1 Background

As reported to CC19, various areas of non-compliance had been noted for South Africa since CC16. Consequently, CC16 recommended that South Africa develop a plan together with associated timeframes to address the issues of non-compliance identified by CC16 on a step-by-step basis. This plan was to be provided as soon as practical and no later than CC17. Subsequent to this:

- At CC17 it was reported that South Africa had not provided its corrective action plan as requested, but it was also not present at the meeting to respond to questions on this.
- South Africa advised CCSBT 29 that it committed to respond to all outstanding compliance matters including providing a timeframe within which to do so.
- CC18 noted that the corrective action plan had not been provided by South Africa, however, South Africa stated that it planned to provide a Corrective Action Plan no later than 31 December 2023.
- CC19 noted that the corrective action plan had not been provided by South Africa. South Africa gave a renewed commitment to provide a corrective action plan prior to 31 December 2024.
- At CC19, South Africa noted that its non-compliance issues were largely administrative and did not suggest a risk of over-catch.

3.2 Update on South Africa's Corrective Action Plan

On 18 December 2024, a draft corrective action plan was received from South Africa. The Secretariat reviewed this and provided some suggestions to South Africa. On 31 December 2024 the Secretariat received a final corrective action plan from South Africa, and this is included as **Attachment C** to this paper. The corrective action plan is based around the areas of non-compliance reported to CC19. Specifically, the areas of non-compliance included in the plan were:

1. Data were not provided for the Ecologically Related Species (ERS) Data Exchange process in 2022 and 2023;
2. Data were not provided for the Scientific Data Exchange process in 2022 and 2023;
3. Lack of provision of a National Report to the ERS Working Group (ERSWG) in 2022;
4. Lack of provision of National Reports to the Extended Scientific Committee (ESC) in 2022 and 2023;

5. Lack of attendance of some meetings, in particular the ESC and CC¹⁸;
6. Uncertainties regarding South Africa's total Southern Bluefin Tuna (SBT) attributable mortalities as the Catch Documentation Scheme (CDS) estimated catch is substantially higher than the catch reported in South Africa's National Report (when provided) and Monthly Catch Reports;
7. Occasional unauthorised vessels;
8. Data submission issues, including some CDS documents not being submitted or submitted up to six months late, CDS forms submitted with duplicate numbers, submission of incomplete or non-compliant CDS forms; and
9. Port inspection reports often being submitted up to a year late.

In addition to the nine areas above, South Africa included a tenth area based on the recommendation of CCSBT29 that the Secretariat convene a contact group to support South Africa. Therefore, the following tenth 'area of non-compliance' was included in the plan:

10. Participate regularly in a contact group convened by the Executive Secretary.

In relation to the areas of non-compliance numbered 1 – 4, South Africa recorded the status as completed in the corrective action plan. As reported to CC19, South Africa had addressed the areas of data provision that had previously not been provided and has maintained its compliance with scientific data provision requirements in 2025. Specifically:

- South Africa attended and provided a National Report to the latest meeting of the ERS Working Group (ERSWG15);
- South Africa provided a National Report to the Extended Scientific Committee in 2024 (ESC29) and 2025 (ESC30);
- South Africa has provided all outstanding data to the Ecologically Related Species (ERS) Data Exchange and the Scientific Data Exchange and has complied with its scientific data provision obligations in 2025.

In addition, South Africa did provide its national report to CC19/EC31, although this was submitted late and was received one day prior to the commencement of CC19, which meant that Members had very limited time to review the report prior to CC19.

In relation to the remaining areas of non-compliance, where appropriate, the Secretariat has provided a brief comment in the table below.

Area of Non-compliance	South Africa Target Timframe and Update	Secretariat Comment
5. Lack of attendance at some meetings, in particular the ESC and CC.	Delivery Target: 2027 Participation in meetings is continuously evaluated against existing capacity and priorities.	

¹⁸ South Africa did attend CC18 in 2023 but not CC16 and CC17

6. Uncertainties regarding South Africa's total Southern Bluefin Tuna (SBT) attributable mortalities as the Catch Documentation Scheme (CDS) estimated catch is substantially higher than the catch reported in South Africa's National Report and Monthly Catch Reports.	Delivery Target: 2026 South Africa is working on reconciling the CDS, eSBT (monthly reporting) and the National Report (including the Scientific Data Exchange) data to ensure alignment, for 2024 and onwards.	South Africa's CDS data reporting has improved and, in general, there is a stronger correlation across different catch and CDS reporting in 2024. CDS estimated catch levels remain higher, however most (but not all) of this discrepancy appears to relate to the conversion factor applied to DRO (reported on CMFs). The Secretariat notes that South Africa have submitted a paper on this to ESC.
7. Occasional unauthorized vessels.	Delivery Target: 2026 The contract of current administrative staff has been extended and are currently undergoing training in Data and Database management and Reporting.	No further issues arose for South Africa with regards unauthorised vessels in 2024 and vessel authorisation data. However, retrospective vessel authorisations are consistently received with, on occasion, the authorisation period commencing over four months prior to notification.
8. Data submission issues, including some CDS documents not being submitted or submitted up to six months late, CDS forms submitted with duplicate numbers, and submission of incomplete or non-compliant CDS forms.	Delivery Target: 2026 The contract of the current administrative staff has been extended, and they are currently undergoing training in Data and Database management.	While many issues still remain with South Africa's data submission, further improvements have been made in some areas. Duplicate numbers on CDS documents still occur, but currently in much lower numbers. Some CDS forms have been provided late, and some reconciliation issues are still to be addressed, but South Africa have been responsive to most Secretariat requests related to CDS data.
9. Port inspection Reports often being submitted up to a year late.	Delivery Target: 2024 (but listed as ongoing) Additional Fisheries Honorary Compliance Officers have been appointed through the EPWP Project. Additional Workers to be appointed in the next two years. Training and recruitment are ongoing.	Only three port inspection reports were received from South Africa in 2024, but none of these related to vessels carrying or landing SBT. Further understanding of South Africa's compliance in this area will depend on the

		submission of its national report to CC20/CCSBT32.
10. Participate regularly in a contact group convened by the Executive Secretary.	Delivery Target: 2025 Engagements and communication has improved between Fisheries Research and Management Staff as well as Senior Managers of the Fisheries Branch.	Several attempts have been made by the Secretariat to initiate the 'contact group' to support regular communication and support. However, at the time of writing all of these remain unanswered and there has been no further response from South Africa since the corrective action plan was submitted.

3.3 Conclusion Regarding South Africa's Corrective Actions and Compliance

The Secretariat notes the following points in relation to South Africa's corrective action plan for the consideration of CC20:

- South Africa's compliance with scientific and ERS data provisions obligations has improved significantly. In the corrective action plan, South Africa's actions to address the areas of non-compliance numbered 1 – 4 all centred on the recruitment and appointment of a dedicated Large Pelagic Researcher. The corrective action plan indicates that the Large Pelagic Researcher has been appointed, but it is unclear what further actions South Africa is taking to ensure that the recent improvements are sustainable should there be any changes in this position.
- Whilst there has been improvement in some areas of the CDS implementation and CDS data submission, some issues still remain, and some broader data provision requirements were missed by South Africa in 2024 (such as initial quota allocation and the late provision of the national report to CC19/EC31). In relation to additional resourcing or support required, South Africa has noted skills development and training and the Compliance Committee may wish to consider these areas when discussing the Capacity Building Workplan (CC Agenda item 2.3.2, paper CCSBT–CC/2510/07).
- The Secretariat has received an increased number of port inspection reports from South Africa so far in 2025, but the majority of these reports continue to be received after the required date (more than 14 days after the completion of the inspection).
- The lack of communication subsequent to the submission of the corrective action plan makes it impossible for the Secretariat to assess whether progress has been made in the implementation of the plan.

4. Action Required

CC20 is invited to:

- For Indonesia:

- Review the information provided on Indonesia's implementation of its payback plan.
- Advise CCSBT 32 on the effectiveness of the plan to date and recommend whether the Payback Plan should remain as agreed by CCSBT 28 or updated; and
- Advise CCSBT 32 on Indonesia's 2024 compliance with CCSBT obligations to inform its decision on whether to continue, revoke or reduce Indonesia's special temporary allowance of 130t per year provided for 2026.
- For South Africa:
 - Note South Africa's recent improved responses to outstanding compliance matters, particularly the provision of outstanding data, national reports, and meeting attendance.
 - Note the additional information provided by South Africa through the submission of its corrective action plan; and
 - Make recommendations to CCSBT 32 regarding:
 - Appropriate measures to take based on the corrective actions process, noting the skills development and training additional support requirements identified in the corrective action plan and potential opportunities through the CCSBT Capacity Building Plan.

Prepared by the Secretariat

INDONESIA'S CURRENTLY AGREED PAYBACK PLAN*(Source: Paragraph 69, Table 3 of Report of EC of CCSBT 28)***Gradual Pay Back for Indonesia's Over-catch in 2019 - 2020**

TAC 2020 after pay back	Total catch 2020	Final total over- catch 2020	Gradual Pay Back (5 years)	
			Year	Pay Back
841t	1,298t	457t	2022	91.3 t
			2023	91.3 t
			2024	91.3 t
			2025	91.3 t
			2026	91.3 t

OVERUTILISATION OF CMFS IN REEFS ISSUED BY INDONESIA

CMF Document Reference	Original Document Product (F/FR)	Weight (kg) on Original Document	REEF Document Reference	Exporting Processed Type	Weight (kg) Exported*	Difference (REEF less CMF)
CMID22 – 1	GGO	5762.00	REID23 – 1	SAK	4000.00	1988.00
			REID23 – 2	SAK	850.00	
			REID24 – 1	NEG	1400.00	
			REID24 – 1	LOI	1500.00	
			Total REEF		7750.00	
CMID22 – 2	GGO	7555.00	REID23 – 3	SAK	3361.36	566.36
			REID23 – 4	SAK	1260.00	
			REID24 – 2	NEG	1600.00	
			REID24 – 2	LOI	1900.00	
			Total REEF		8121.36	
CMID23 – 1	GGO	2089.00	REID23 – 5	BM	1320.00	2112.10
			REID23 – 6	SAK	1670.00	
			REID24 – 3	SAK	1211.10	
			Total REEF		4201.10	
CMID23 – 2	GGO	5241.00	REID23 – 7	SAK	3407.00	14608.71
			REID23 – 8	SAK	4335.00	
			REID24 – 4	LOI	14.00	

CMF Document Reference	Original Document Product (F/FR)	Weight (kg) on Original Document	REEF Document Reference	Exporting Processed Type	Weight (kg) Exported*	Difference (REEF less CMF)
			REID24 – 4	SAK	3393.00	
			REID24 – 5	FL	3155.51	
			REID24 – 6	NAK	1360.78	
			REID24 – 7	SAK	1156.66	
			REID24 – 8	SAK	1796.24	
			REID24 – 8	NAK	1231.52	
			Total REEF		19849.71	
CMID23 – 3	GGO	1269.00	REID23 – 9	SAK	821.00	1661.00
			REID23 – 10	SAK	805.00	
			REID24 – 9	TR	150.00	
			REID24 – 10	TR	828.00	
			REID24 – 11	KIR	326.00	
			Total REEF		2930.00	
CMID23 – 4	GGO	2480.00	REID24 – 12	SAK	1000.00	1550.91
			REID24 – 13	SAK	820.91	
			REID24 – 14	LOI	13.00	
			REID24 – 14	SAK	1597.00	
			REID24 – 14	BM	600.00	
			Total REEF		4030.91	
CMID23 – 5	GGO	8982.00	REID23 – 11	SAK	3000.00	20148.69
			REID23 – 12	SAK	2000.00	

CMF Document Reference	Original Document Product (F/FR)	Weight (kg) on Original Document	REEF Document Reference	Exporting Processed Type	Weight (kg) Exported*	Difference (REEF less CMF)
			REID23 – 13	TR	2994.00	
			REID24 – 15	SAK	1000.00	
			REID24 – 15	TR	470.00	
			REID24 – 16	SAK	1996.00	
			REID24 – 17	TR	848.00	
			REID24 – 18	LOI	1116.00	
			REID24 – 19	SAK	4710.00	
			REID24 – 20	FL	5407.98	
			REID24 – 21	KIR	2248.00	
			REID24 – 22	FL	3340.71	
			Total REEF		29130.69	
CMID23 – 6	GGO	7361.00	REID24 – 23	SAK	5000.00	9441.22
			REID24 – 24	LOI	14.00	
			REID24 – 24	SAK	4770.00	
			REID24 – 25	SAK	727.27	
			REID24 – 26	FL	4431.95	
			REID24 – 27	KIR	1859.00	
			Total REEF		16802.22	
CMID23 – 7	GGO	750.00	REID23 – 14	FL	502.00	342.00
			REID24 – 28	FL	590.00	
			Total REEF		1092.00	
CMID23 – 8	GGO	344.00	REID24 – 29	SAK	220.00	95.00

CMF Document Reference	Original Document Product (F/FR)	Weight (kg) on Original Document	REEF Document Reference	Exporting Processed Type	Weight (kg) Exported*	Difference (REEF less CMF)
			REID24 – 30	SAK	219.00	
			Total REEF		439.00	
CMID23 – 9	GGO	242.00	REID24 – 31	SAK	160.00	77.00
			REID24 – 32	SAK	159.00	
			Total REEF		319.00	
CMID23 – 10	GGO	288.00	REID24 – 33	SAK	190.00	81.00
			REID24 – 34	SAK	179.00	
			Total REEF		369.00	
CMID23 – 11	GGO	230.00	REID24 – 35	SAK	150.00	70.00
			REID24 – 36	TR	150.00	
			Total REEF		300.00	
CMID23 – 12	GGO	357.00	REID24 – 37	SAK	230.00	102.00
			REID24 – 38	TR	229.00	
			Total REEF		459.00	
CMID23 – 13	GGO	438.00	REID24 – 39	SAK	279.00	120.00
			REID24 – 40	SAK	279.00	
			Total REEF		558.00	
CMID23 – 14	GGO	192.00	REID24 – 41	SAK	120.00	48.00
			REID24 – 42	SAK	120.00	

CMF Document Reference	Original Document Product (F/FR)	Weight (kg) on Original Document	REEF Document Reference	Exporting Processed Type	Weight (kg) Exported*	Difference (REEF less CMF)
			Total REEF		240.00	
CMID23 – 15	GGO	456.00	REID24 – 43	SAK	289.00	122.00
			REID24 – 44	TR	289.00	
			Total REEF		578.00	
CMID23 – 16	GGO	8385.00	REID24 – 45	SAK	1363.64	1068.64
			REID24 – 46	SAK	3890.00	
			REID24 – 47	SAK	700.00	
			REID24 – 48	SAK	3500.00	
			Total REEF		9453.64	
CMID23 – 17	GGO	8340.00	REID24 – 49	SAK	3270.00	3393.64
			REID24 – 50	SAK	2000.00	
			REID24 – 51	SAK	1363.64	
			REID24 – 52	LOI	2400.00	
			REID24 – 53	NEG	1700.00	
			REID24 – 54	SAK	1000.00	
			Total REEF		11733.64	
CMID24 – 1	GGO	13218.00	REID24 – 55	LOI	7000.00	5332.00
			REID24 – 56	SAK	7000.00	
			REID24 – 57	LOI	4550.00	
			Total REEF		18550.00	

CMF Document Reference	Original Document Product (F/FR)	Weight (kg) on Original Document	REEF Document Reference	Exporting Processed Type	Weight (kg) Exported*	Difference (REEF less CMF)
CMID24 – 2	GGO	8310.00	REID24 – 58	LOI	4500.00	3390.00
			REID24 – 59	SAK	4500.00	
			REID24 – 60	SAK	2700.00	
			Total REEF		11700.00	
CMID24 – 3	GGO	8284.00	REID24 – 61	NEG	5000.00	2066.00
			REID24 – 62	SAK	650.00	
			REID24 – 63	SAK	2300.00	
			REID24 – 63	LOI	2400.00	
			Total REEF		10350.00	
CMID24 – 4	GGO	8032.00	REID24 – 64	SAK	3000.00	-182.00
			REID24 – 65	SAK	1850.00	
			REID24 – 66	NEG	3000.00	
			Total REEF		7850.00	
CMID24 – 5	GGO	8456.00	REID24 – 67	SAK	1377.00	7231.55
			REID24 – 68	SAK	2727.27	
			REID24 – 69	SAK	4121.00	
			REID24 – 70	TR	3.83	
			REID24 – 71	SAK	2727.27	
			REID24 – 72	TR	800.00	
			REID24 – 72	NAK	1200.00	
			REID24 – 73	FL	2731.18	
			Total REEF		15687.55	

CMF Document Reference	Original Document Product (F/FR)	Weight (kg) on Original Document	REEF Document Reference	Exporting Processed Type	Weight (kg) Exported*	Difference (REEF less CMF)
CMID24 – 6	GGO	450.00	REID24 – 74	SAK	306.00	156.00
			REID24 – 75	SAK	300.00	
			Total REEF		606.00	
CMID24 – 7	GGO	1835.00	REID24 – 76	SAK	900.00	262.00
			REID24 – 77	SAK	1197.00	
			Total REEF		2097.00	
CMID24 – 8	GGO	14061.00	REID24 – 78	NAK	1381.82	17166.12
			REID24 – 78	SAK	200.00	
			REID24 – 79	NAK	500.00	
			REID24 – 79	SAK	5936.36	
			REID24 – 80	SAK	1350.00	
			REID24 – 81	SAK	3409.09	
			REID24 – 82	SAK	9211.00	
			REID24 – 83	FL	7302.85	
			REID24 – 84	TR	1936.00	
			Total REEF		31227.12	
CMID24 – 9	GGO	2320.00	REID24 – 85	SAK	579.55	1036.10
			REID24 – 85	SAK	579.55	
			REID24 – 86	KIR	690.00	
			REID24 – 87	TR	1507.00	

CMF Document Reference	Original Document Product (F/FR)	Weight (kg) on Original Document	REEF Document Reference	Exporting Processed Type	Weight (kg) Exported*	Difference (REEF less CMF)
			Total REEF		2776.55	
CMID24 – 10	GGO	2228.00	REID24 – 88	SAK/TR	758.00	-242.00
			REID24 – 89	SAK	1008.00	
			REID24 – 90	KAM	220.00	
			Total REEF		1986.00	
CMID24 – 11	GGO	1082.00	REID24 – 91	FL	645.50	262.50
			REID24 – 92	SAK	699.00	
			Total REEF		1344.50	
CMID24 – 12	GGO	414.00	REID24 – 93	FL	246.97	101.97
			REID24 – 94	SAK	269.00	
			Total REEF		515.97	
CMID24 – 13	GGO	3960.00	REID24 – 95	FL	2570.00	1037.27
			REID24 – 96	SAK	2427.27	
			Total REEF		4997.27	
CMID24 – 14	GGO	2477.00	REID24 – 97	FL	1600.00	752.54
			REID24 – 98	SAK	579.54	
			REID24 – 99	SAK	300.00	
			REID24 – 100	SAK	750.00	
			Total REEF		3229.54	

CMF Document Reference	Original Document Product (F/FR)	Weight (kg) on Original Document	REEF Document Reference	Exporting Processed Type	Weight (kg) Exported*	Difference (REEF less CMF)
CMID24 – 15	GGO	4147.00	REID24 – 101	FL	2680.00	1412.54
			REID24 – 102	SAK	2300.00	
			REID24 – 103	SAK	579.54	
			Total REEF		5559.54	
CMID24 – 16	GGO	400.00	REID24 – 104	FL	250.00	110.00
			REID24 – 105	SAK	260.00	
			Total REEF		510.00	
CMID24 – 17	GGO	7036.00	REID24 – 106	FL	3100.00	2980.00
			REID24 – 106	FL	1660.00	
			REID24 – 107	SAK	3503.00	
			REID24 – 108	BM	1453.00	
			REID24 – 108	KIR	300.00	
			Total REEF		10016.00	
CMID24 – 18	GGO	5499.00	REID24 – 109	FIL	2640.00	1402.00
			REID24 – 109	FIL	1080.00	
			REID24 – 110	SAK	1816.00	
			REID24 – 111	KIR	1365.00	
			Total REEF		6901.00	
CMID24 – 19	GGO	6355.00	REID24 – 112	FL	1800.00	2705.00
			REID24 – 112	FL	2560.00	
			REID24 – 113	SAK	4000.00	

CMF Document Reference	Original Document Product (F/FR)	Weight (kg) on Original Document	REEF Document Reference	Exporting Processed Type	Weight (kg) Exported*	Difference (REEF less CMF)
			REID24 – 114	SAK	700.00	
			Total REEF		9060.00	
CMID24 – 20	GGO	7313.00	REID24 – 115	SAK	3050.00	3935.18
			REID24 – 116	FL	1930.00	
			REID24 – 117	SAK	4700.00	
			REID24 – 118	SAK	1568.18	
			Total REEF		11248.18	
CMID24 – 21	GGO	6055.00	REID24 – 119	SAK	2041.17	1390.18
			REID24 – 119	NAK	690.01	
			REID24 – 120	TR	3123.00	
			REID24 – 121	TR	46.00	
			REID24 – 122	NAK	1545.00	
			Total REEF		7445.18	
CMID24 – 22	GGO	5071.00	REID24 – 123	FL	1090.00	2207.63
			REID24 – 123	FL	2400.00	
			REID24 – 124	NAK	2727.27	
			REID24 – 124	SAK	1061.36	
			Total REEF		7278.63	
CMID24 – 23	GGO	5112.00	REID24 – 125	FL	1800.00	2578.00
			REID24 – 125	FL	1690.00	
			REID24 – 126	SAK	2200.00	

CMF Document Reference	Original Document Product (F/FR)	Weight (kg) on Original Document	REEF Document Reference	Exporting Processed Type	Weight (kg) Exported*	Difference (REEF less CMF)
			REID24 - 127	SAK	2000.00	
			Total REEF		7690.00	
CMID24 – 24	GGO	4556.00	REID24 – 128	SAK	1550.00	2043.55
			REID24 – 128	SAK	1520.00	
			REID24 – 129	SAK	2950.00	
			REID24 – 130	SAK	579.55	
			Total REEF		6599.55	
CMID24 – 25	GGO	5121.00	REID24 – 131	SAK	1320.00	2300.36
			REID24 – 131	SAK	2140.00	
			REID24 – 132	SAK	2700.00	
			REID24 – 133	SAK	1261.36	
			Total REEF		7421.36	
CMID24 – 26	GGO	5016.00	REID24 – 134	NEG	3000.00	3791.00
			REID24 – 135	SAK	750.00	
			REID24 – 136	SAK	3812.00	
			REID24 – 137	NAK	1245.00	
			Total REEF		8807.00	
CMID24 – 27	GGO	2254.00	REID24 – 138	TR	1158.00	663.55
			REID24 – 139	NEG	1000.00	
			REID24 – 139	SAK	204.55	
			REID24 – 140	NAK	555.00	

CMF Document Reference	Original Document Product (F/FR)	Weight (kg) on Original Document	REEF Document Reference	Exporting Processed Type	Weight (kg) Exported*	Difference (REEF less CMF)
			Total REEF		2917.55	
CMID24 – 28	GGO	2355.00	REID24 – 141	GGO	2355.00	1600.00
			REID24 – 142	LOI	1600.00	
			Total REEF		3955.00	
CMID24 – 29	GGO	5015.00	REID24 – 143	LOI	2500.00	1530.46
			REID24 – 144	LOI	2500.00	
			REID24 – 145	SAK	1545.46	
			Total REEF		6545.46	

SOUTH AFRICA'S ACTION PLAN TO ADDRESS ITS NON-COMPLIANCE

No.	Area of Non-Compliance	Challenges/ Deficiencies that Contributed to the Non-Compliance	Completed/ Planned Actions to Address Challenges/ Deficiencies	Additional Resourcing or Support Required	Target Timeframe for Completion of Actions	Update Description	Status
1.	Data was not provided for the Ecologically Related Species (ERS) Data Exchange process in 2022 and 2023.	Vacant and unfunded post of a dedicated Large Pelagic Researcher.	Recruit and appoint a dedicated Large Pelagic Researcher and acquire additional financial resources to support Fisheries Research.	Financial and human resources.	2024	South Africa has now provided all outstanding data to the Ecologically Related Species (ERS) Data Exchange and the Scientific Data Exchange.	Completed. A dedicated Large Pelagic Researcher has been appointed and process underway to review the Fisheries funding model.
2.	Data was not provided for the Scientific Data Exchange process in 2022 and 2023.	Vacant and unfunded post of a dedicated Large Pelagic Researcher.	Recruit and appoint a dedicated Large Pelagic Researcher and acquire additional financial resources to support Fisheries Research.	Financial and human resources.	2024	South Africa has now provided all outstanding data to the Ecologically Related Species (ERS) Data Exchange and the Scientific Data Exchange	Completed. A dedicated Large Pelagic Researcher has been appointed and process underway to review the Fisheries funding model
3.	Lack of provision of a National Report to the ERS Working Group	Vacant and unfunded post of a dedicated Large Pelagic Researcher.	Recruit and appoint a dedicated Large Pelagic Researcher and acquire additional financial	Financial and human resources.	2024	South Africa attended and provided a National Report to the latest meeting of the ERS Working Group (ERSWG15). The ERSWG15 (2024) report includes data from	Completed. A dedicated Large Pelagic Researcher has been appointed and process underway to review the Fisheries funding model.

No.	Area of Non-Compliance	Challenges/ Deficiencies that Contributed to the Non-Compliance	Completed/ Planned Actions to Address Challenges/ Deficiencies	Additional Resourcing or Support Required	Target Timeframe for Completion of Actions	Update Description	Status
	(ERSWG) in 2022.		resources to support Fisheries Research.			2019-2023 that would have been provided in the "missing" reports from previous years.	
4.	Lack of provision of National Reports to the Extended Scientific Committee (ESC) in 2022 and 2023.	Vacant and unfunded post of a dedicated Large Pelagic Researcher.	Recruit and appoint a dedicated Large Pelagic Researcher and acquire additional financial resources to support Fisheries Research.	Financial and human resources.	2024	South Africa provided a National Report to the latest meeting of the Extended Scientific Committee (ESC29). The ESC29 (2024) report includes data from 2019-2023 that would have been provided in the "missing" reports from previous years.	Completed. A dedicated Large Pelagic Researcher has been appointed and process underway to review the Fisheries funding model. Additional Staff are also being trained to complete and submit Reports.
5.	Lack of attendance at some meetings, in particular the ESC and CC.	Vacant and unfunded post of a dedicated Large Pelagic Researcher and a Fisheries Manager. Participation in International Meetings is prioritized against other government priorities subject to availability of	Recruit and appoint a dedicated Large Pelagic Researcher and a Fisheries Manager and acquire additional financial resources and support to allow them to participate in all ESC and CC Meetings.	Financial and human resources. Hybrid Meetings.	2027	South Africa attended CC19 (2024). South Africa received Ministerial approval late to attend the ESC29 (2024) due to the change in Political Administration as international Trips are applied for months in advance. South Africa endeavors to attend the CC20 and ESC30 in 2025, depending on the availability of human capacity and funds for delegates to travel. Participation in meetings is continuously evaluated against existing capacity and priorities.	Ongoing. A dedicated Large Pelagic Researcher has been appointed and the appointment of a Fisheries Manager remains outstanding. There is a moratorium on recruitment process broadly within government. Filling vacant positions is subject to the availability of funds and weighed against other vacant posts.

No.	Area of Non-Compliance	Challenges/ Deficiencies that Contributed to the Non-Compliance	Completed/ Planned Actions to Address Challenges/ Deficiencies	Additional Resourcing or Support Required	Target Timeframe for Completion of Actions	Update Description	Status
		personnel and funds.					
6.	Uncertainties regarding South Africa's total Southern Bluefin Tuna (SBT) attributable mortalities as the Catch Documentation Scheme (CDS) estimated catch is substantially higher than the catch reported in South Africa's National Report and Monthly Catch Reports.	Lack of capacity and trained personnel (Officials and Industry).	The contract of current administrative staff has been extended and are currently undergoing training in Data and Database management. Additional Administrative and Scientific Support Staff (Expanded Public Works Programme (EPWP) Contract Workers) to be appointed in the next two years.	Skills development and training.	2026	South Africa is working on reconciling the CDS, eSBT (monthly reporting) and the National Report (including the Scientific Data Exchange) data to ensure alignment, for 2024 and onwards.	Ongoing. A dedicated Large Pelagic Researcher has been appointed and the appointment of a Fisheries Manager remains outstanding. There is a moratorium on recruitment process broadly within government. Filling vacant positions is subject to the availability of funds and weighed against other vacant posts.
7.	Occasional unauthorized vessels.	Lack of capacity and suitably trained personnel	The contract of current administrative staff has been extended	Skills development and training.	2026	A large pelagic fishing vessel operating within the South African fishery sector was confirmed to have legally caught and exported the fish	Ongoing. A dedicated Large Pelagic Researcher has been appointed and the appointment of a

No.	Area of Non-Compliance	Challenges/ Deficiencies that Contributed to the Non-Compliance	Completed/ Planned Actions to Address Challenges/ Deficiencies	Additional Resourcing or Support Required	Target Timeframe for Completion of Actions	Update Description	Status
		(Officials and Industry).	and they are currently undergoing training in Data and Database management and Reporting. Additional Administrative and Scientific Support Staff (EPWP Contract Workers) to be appointed in the next two years. Training and information sharing will also be extended to the industry with the support of the CCSBT Secretariat.			in question. South Africa verified the authenticity of the relevant documentation. However, the client initially submitted an outdated form required for registering the vessel on the CCSBT authorised vessel list. While the corrected documentation was subsequently provided, the Department unfortunately delayed the submission of the information to the Secretariat, leading to a temporary delay in the vessel's registration. The vessel has since been successfully registered on the CCSBT authorised vessel list, with the registration taking effect from 1 March 2023.	Fisheries Manager remains outstanding. There is a moratorium on recruitment process broadly within government. Filling vacant positions is subject to the availability of funds and weighed against other vacant posts.
8.	Data submission issues, including some CDS documents not	Lack of capacity and trained personnel	The contract of the current administrative staff has been extended	Skills development and training.	2026	South Africa has been responsive and provided missing 2023 CDS data, 2023 catch by vessel summary and their initial quota allocation for	Ongoing. Contract Workers responsible for permitting and licensing have been reappointed and the

No.	Area of Non-Compliance	Challenges/ Deficiencies that Contributed to the Non-Compliance	Completed/ Planned Actions to Address Challenges/ Deficiencies	Additional Resourcing or Support Required	Target Timeframe for Completion of Actions	Update Description	Status
	being submitted or submitted up to six months late, CDS forms submitted with duplicate numbers, and submission of incomplete or non-compliant CDS forms.	(Officials and Industry).	and they are currently undergoing training in Data and Database management. Additional Administrative and Scientific Support Staff (EPWP Contract Workers) to be appointed in the next two years. Training and information sharing will also be extended to the industry with the support of the CCSBT Secretariat.			the 2024/2025 fishing season. The feedback received from the CCSBT on reconciliation of CDS data, eSBT data and the Scientific Data Exchange has identified areas for improvement when CDS documents are verified and prior to reporting data to CCSBT. Areas for improvement have been identified and recent improvements include: • A relational database has been developed with validation rules that aim to resolve and reduce these errors before reporting. • Increased cross-checking among these data sources should be conducted prior to data submissions. • The central storage and standardised naming scheme of all scanned CMFs is in progress. • CMFs recorded by government officials are compared with a tally of all CMFs used by	appointment of a Fisheries Manager remains outstanding. There is a moratorium on recruitment process broadly within government. Filling vacant positions is subject to the availability of funds and weighed against other vacant posts.

No.	Area of Non-Compliance	Challenges/Deficiencies that Contributed to the Non-Compliance	Completed/Planned Actions to Address Challenges/Deficiencies	Additional Resourcing or Support Required	Target Timeframe for Completion of Actions	Update Description	Status
						exporters, monthly, to identify missing validated CMFs. • SBT are generally landed in GGO dressing type and exported in DRO/DRT dressing type. Provisional analysis indicates that the 1.8 conversion factor for DRO/DRT to RD is too high. South Africa is working on providing analysis and a request to reduce the conversion factor, resolving a large proportion of this issue. • Increased training of validators to improve on errors when validating	
9.	Port inspection Reports often being submitted up to a year late.	Lack of capacity and trained personnel in Fisheries Compliance.	Additional Fisheries Honorary Compliance Officers have been appointed through the EPWP Project. Additional Workers to be appointed in the next two years.	Increased Human Capacity, technology and Skills development and training.	2024	The Fisheries Compliance Team responsible has been augmented and fixed reminders set in their electronic Operations Programs to submit Port Inspection Reports within a week of inspection.	Training and recruitment are ongoing. There is a moratorium on recruitment process broadly within government. Filling vacant positions is subject to the availability of funds and weighed against other vacant posts.

No.	Area of Non-Compliance	Challenges/ Deficiencies that Contributed to the Non-Compliance	Completed/ Planned Actions to Address Challenges/ Deficiencies	Additional Resourcing or Support Required	Target Timeframe for Completion of Actions	Update Description	Status
10.	Participate regularly in a contact group convened by the Executive Secretary.	Vacant and unfunded post of a dedicated Large Pelagic Researcher and a Fisheries Manager. This poses a challenge in engaging all RFMOs and properly managing the domestic fisheries.	Recruit and appoint a dedicated Large Pelagic Researcher, a Fisheries Manager and relevant support staff and acquire additional financial resources and support to allow them to engage regularly and timeously with the Executive Secretariat.	Financial and human resources. Hybrid Meetings.	2025	Engagements and communication has improved between Fisheries Research and Management Staff as well as Senior Managers of the Fisheries Branch.	Ongoing. A dedicated Large Pelagic Researcher has been appointed and the appointment of a Fisheries Manager remains outstanding. There is a moratorium on recruitment process broadly within government. Filling vacant positions is subject to the availability of funds and weighed against other vacant posts.