



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 Thirtieth Annual Meeting of the Commission and Extended Commission (CCSBT 30)¹ 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. Paragraph 15 of the Resolution states that the trial period shall conclude on 31 October 2025 and that:

15. ...A Quality Assurance Review (QAR), whose aim will be to provide an independent assessment of the performance of the trial, will be conducted in 2025 and presented to CC 20... In addition to the QAR, CC 20 shall also consider advice from the IOTC as well as the performance in meeting existing CCSBT transshipment obligations.

The purpose of this paper is to present the final QAR report, to update CC20 on the discussions at IOTC on the Indonesia's trial at-sea transshipment observer programme and to report back on the Secretariat's monitoring of obligations in the last twelve months.

2. Background

At the Eighteenth meeting of the Compliance Committee (CC18) Indonesia clarified 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.

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 (CCSBT30), and the trial commenced on 1 November 2023.

The Nineteenth Meeting of CCSBT's Compliance Committee (CC19) endorsed the terms of reference (TOR) for the QAR and the meeting noted that the information from the QAR would be beneficial to the Commission in deciding whether to continue the trial transshipment in the future and would also assist Indonesia to improve the program.

The Secretariat distributed the TOR and a request for proposals in late 2024 and MRAG Asia Pacific, led by Duncan Souter, was selected as the preferred QAR provider. CCSBT Circular #2024/46 was sent to all Members on 11 December 2024 confirming the selection and providing Members with the opportunity to submit any objection to MRAG Asia Pacific undertaking the QAR. No objections were received from Members and MRAG Asia Pacific commenced work on the QAR early in 2025.

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

3. 2025 QAR Report on Indonesia's At-Sea Transshipment Activities

Consistent with the timetable developed by the Secretariat, the final draft report was submitted to the Secretariat and Indonesia for comment on 23 June 2025. Comments were requested by 31 July 2025 to ensure that the report could be finalised in time for its presentation to CC20. No comments were received from Indonesia, and the final report was provided to the Secretariat on 21 August 2025.

The final QAR report is provided to Members as Paper [CCSBT-CC/2510/21](#).

4. IOTC's review of Indonesia's Pilot Project for Monitoring of Transshipments at Sea

IOTC conducted its own independent review of the implementation of Indonesia's pilot project for monitoring of transshipment at sea and a consultant report was presented to the [22nd Session of the IOTC Compliance Committee](#) in April 2025. This [IOTC consultant report](#) has been provided as an information paper (Info 01) to CC20, should Members wish to consult this.

The IOTC noted the continued increase in the number of large-scale tuna longline vessels and carrier vessels participating in the pilot project and agreed that it was not appropriate to further extend Indonesia's pilot project. While recognising other outstanding difficulties highlighted by the independent assessment, the IOTC noted that as a potential way forward, Indonesia could consider to voluntarily implement the SOLAS Resolutions (International Convention for the Safety of Life at Sea) to facilitate its integration within the ROP. The IOTC agreed that Indonesia should propose a way forward, such as a transition plan for its incorporation into the ROP, that would be considered at the Commission.

Following these discussions at the IOTC Compliance Committee, Indonesia presented their [Transitional Plan for Improving Indonesia's National Observer Programme Toward Full IOTC ROP Compatibility \(2025–2027\)](#) to the IOTC Commission meeting. Based on this transitional plan, amendments to the provisions in the IOTC Transshipment Conservation and Management Measure (CMM) related to transshipment by Indonesian vessels were agreed by the Commission. These new amendments to the CMM are included as **Attachment B** to this paper.

5. Secretariat Report on Monitoring of Obligations

As required in the Transshipment Resolution, the Secretariat continues to receive 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.

As reported to CC19, the Secretariat continues to securely store all information received from Indonesia related to the transshipment trial.

a. Level of Transshipment Activity

The Secretariat has received 131² deployment requests for trips leaving port between 1 July 2024 and 30 June 2025. Deployment requests received during this period have included almost 2000 planned transshipments. These trips have resulted in 795 confirmed transshipments with 340 involving transfers of SBT. However, the actual total transshipments completed in this period is expected to be higher than this because transshipment declarations have yet to be received for 22 of the deployments that occurred in this period. These trips that have missing transshipment declarations have expected return dates between early February 2025 and late July 2025 and data should have been provided for most of these trips, particularly those completed earlier in this period.

b. Summary of Records Provided to the Secretariat

The Transshipment Resolution specifies the following data and report submission requirements:

- 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.

Overall, the completeness of the data submissions received from Indonesia during this period has improved significantly from the initial implementation period (1 November 2023 to 1 July 2024) that was reported to CC19. However, some issues persist notably, of the 795 transshipment declarations received:

- All transshipment declarations have been received late, with these received on average 34 days late.
 - For those transshipments that occurred in the second half of 2024, the transshipment declarations were received an average of 20 days after the vessel returned to port.
 - For those transshipments that occurred in the first half of 2025, the transshipment declarations were received an average of 19 days after the vessel returned to port.
- Observer reports were received for all transshipments where the Secretariat received transshipment declarations, and five-day reports were received for most transshipments which is a significant improvement on the data received up until CC19.
 - However, whilst the data provision has improved, the complete documentation is most often received as a package, often with revisions to earlier reports that had been provided for that trip, and this is received well after the trip has been completed.
 - Some discrepancies do still exist between different data sources.

c. Transshipment Matching with Catch Monitoring Forms

The table below shows a comparison of weights reported from transshipment reporting (observer reports and transshipment declarations) to weights reported on catch monitoring forms (CMF) for the 2024 calendar year. The 2024 calendar year is used for this table because only Q1 data from 2025 has been provided at the time of producing this paper.

Month	Weight of SBT on Catch Monitoring Form	Weight of SBT on Transshipment Declaration	Weight of SBT Observer Report
January	158,721	144,805	145,238

² However, three deployments were not completed due to bad weather.

February	93,427	100,487	101,487
March	55,259	57,503	57,685
April	34,191	34,191	34,582
May	26,409	28,371	28,371
June	19,785	22,313	22,313
July	36,431	30,582	31,382
August	13,848	13,085	13,085
September	67,314	65,031	65,031
October	29,463	32,463	33,312
November	33,491	33,150	33,150
December	33,287	33,093	33,093
Grand Total	602,145	595,074	598,729

Table 1: A comparison of weights reported by Indonesia on CMFS, Transshipment Declarations and Observer reports by month during 2024.

There is only a small difference between the total weights reported overall on CMFs and in transshipment reporting. However, the monthly totals can vary by as much as 25%. When the 2024 transshipment data is matched with CMFs this also reflects improved correlation as the year progresses. However, as noted earlier in the paper, the complete package of transshipment data reports is received after the trip has been completed, and can often include revisions to previous reporting. It is unclear how much the CMF reporting may be the basis for any revisions and, if this were to be the basis for alterations, then strong correlation would be expected, but does undermine the independence of the data provided by the transshipment observer programme.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
CMFs that Report Transshipments	111	89	64	49	32	17	23	23	74	43	23	35
Reported Transshipments (Declarations)	69	97	64	52	33	17	23	20	67	36	21	33
CMFs Matched to Reported Transshipments	61	85	53	47	31	17	23	16	71	43	23	35
Percentage of CMFs Matched	55%	96%	83%	96%	97%	100%	100%	70%	96%	100%	100%	100%

Table 2: Summary table showing, by month in 2024, the number of CMFs that report transshipment, the number of reported transshipments and the number and percentage of CMFs that were able to be matched with reported transshipments.

6. Impacts on the Workload of the Secretariat

As noted in the reporting against the Compliance Action Plan ([CCSBT-CC/2510/09](#)), the implementation of Indonesia's trial at-sea transshipment observer programme has seen a significant increase in the amount of transshipment data and information that the Secretariat must now manage and monitor. The previous processes used by the Secretariat to manage transshipment data were not developed to manage this volume of data, nor cater for the type of operation seen in the Indonesian transshipment programme. Because the Indonesian transshipment programme has, to date, been a trial, the Secretariat has developed temporary processes to manage these data that were able to be accommodated within current budgetary and resourcing constraints.

In addition to the Secretariat resourcing considerations detailed in [CCSBT-CC/2510/09](#), if Members decide to continue Indonesia's observer transshipment programme, there will be a need for additional development of Secretariat systems to best manage and monitor these data. The Secretariat is confident that this can be achieved through the further development of an existing transshipment module available in eSBT. The development costs will not be excessive (expected to be less than \$5000) and can be met out of the existing eCDS development budget. However, the eCDS development is prioritised for spending under this budget item, and the timing of the required further eSBT transshipment module development will be impacted by the continued eCDS development costs through the remainder of this year. There will also be additional Secretariat time required to test the system and further develop the queries required to ensure that the key data provision elements can be monitored, in addition to the ongoing data entry and management resourcing requirements discussed in paper [CCSBT-CC/2510/09](#).

7. Summary

CC20 is invited to:

- Review and discuss the 2025 QAR Report on Indonesia's At-Sea Transshipment Programme ([CCSBT-CC/2510/21](#));
- Note the discussions and resulting decisions on the Indonesian transshipment programme at IOTC, and particularly the update to the IOTC Transshipment CMM related to Indonesia's transshipment programme;
- Note the summary of data and information submitted to date as part of Indonesia's trial at-sea transshipment observer programme. Specifically, that there have been clear improvements in the completeness of transshipment data being provided by Indonesia in the last twelve months, however, there remain some key areas where Indonesia is not fully meeting the obligations of the Transshipment Resolution; and
- Consider the increased workload on the Secretariat as a result of the extra transshipment data and the additional resourcing requirements that will be required if the trial is extended.

Prepared by the Secretariat

Attachment A

Final QAR Report on Indonesia's At-Sea Transhipment Activities

The final QAR report is provided to Members as Paper [CCSBT-CC/2510/21](#)

Attachment B

IOTC Conditions Relating to Transshipment by Indonesian Wooden Carrier Vessels

New CMM Paragraphs on Transshipment by Indonesian Vessels:

29. Considering the extraordinary and unique circumstances of the Indonesian wooden carrier vessels, Indonesia may, in place of IOTC observers, use national observers in accordance with Annex VI. Implementation of the procedure in Annex VI shall be gradually implemented to reach full compliance in time for the Compliance Committee in 2026. The Compliance Committee in 2026 shall evaluate the implementation of the procedures in Annex VI and recommend corrective actions to Indonesia as appropriate. The effectiveness of the procedures laid down in Annex VI shall be reviewed in 2027. In particular, compliance of national observers with the tasks and reporting obligations shall be reviewed and assessed by the ROP consortium and reported to the Compliance Committee in 2027. The Commission shall decide in 2027 whether the procedures in paragraph 29, 30 and Annex VI shall be continued.
30. The provision in paragraph 29 shall only apply to the twenty (20) specific wooden carrier vessels listed on the IOTC Record of Authorised Vessels and in Annex VII. Those wooden carrier vessels shall only be authorised to participate in transshipment operations with fishing vessels flagged to Indonesia. Replacement of those wooden carrier vessels are only permitted if the material of substitute vessel shall remain wooden and the carrying capacity or fish hold volume not larger than the vessel(s) being replaced. In such case, the authorisation of the replaced wooden vessel shall be immediately revoked. Any additional Indonesian wooden carrier vessel will be considered by the Commission upon the outcome of the review in 2027.

ANNEX VI
CONDITIONS RELATING TO TRANSSHIPMENT OF INDONESIAN WOODEN CARRIER VESSELS

Training of national observers

1. In order to ensure that national observers are trained at the standards of the IOTC observers, the ROP consortium shall conduct training of trainers to ensure that new national observers are trained to the standards of the IOTC observers in 2026.

Obligations of the national observers

2. The observer tasks shall be as follows:
- a) On the fishing vessel intending to transship to the carrier vessel and before the transshipment takes place, the observer shall:
 - i. check the validity, when possible, of the fishing vessel's authorisation or licence to fish tuna and tuna-like species and sharks in the IOTC area of competence;
 - ii. check and note, by species, to the extent practicable, the total quantity of catch on board, and the quantity to be transferred to the carrier vessel;
 - iii. check that the VMS is functioning and examine the logbook, when possible;
 - iv. verify whether any of the catch on board resulted from transfers from other vessels, and check documentation on such transfers;
 - v. in the case of an indication that there are any violations involving the fishing vessel, immediately report the violations to the carrier vessel's master,
 - vi. report the results of these duties on the fishing vessel in the observers report.
 - b) On the fishing vessel and after the transshipment has taken place, the observer is encouraged to:

- i. check and note, by species, the remaining quantity of the catch on board the fishing vessel and the quantity transferred to the carrier vessel;
 - ii. report the results in the observers' report.
- c) On the carrier vessel, the observer shall monitor the carrier vessel's compliance with the relevant Conservation and Management Measures adopted by the Commission and in particular, shall:
 - i. record and report upon the transshipment activities carried out;
 - ii. verify the position of the vessel when engaged in transshipping;
 - iii. observe and estimate products transhipped;
 - iv. verify and record the name of the LSTLV concerned and its IOTC registration number;
 - v. verify the data contained in the transshipment declaration;
 - vi. certify the data contained in the transshipment declaration;
 - vii. countersign the transshipment declaration;
 - viii. issue a daily report of the carrier vessels transshipping activities;
 - ix. prepare a general report compiling the information collected in accordance with this paragraph and provide the master the opportunity to include therein any relevant information;

Reporting to the ROP consortium

- 3. The national observer shall submit the aforementioned general report in paragraph 2 c) ix within 20 days from the end of the period of observation to its flag State, and to the ROP consortium for information, after the training of trainers and follow-up training for observers has been conducted.
- 4. The flag State shall then verify and translate the general report submitted by the observer, as referred to in paragraph 3, and submit it to the ROP consortium within 10 days of receiving it.
- 5. The ROP consortium shall evaluate the report against the obligations of the national observers mentioned in paragraph 2 and report its finding to the WPICMM and to the IOTC Compliance Committee in 2027.

Obligations on Indonesia as flag State

- 6. The responsibilities of the flag State of the carrier vessels and their masters in relation to observers shall include the following:
 - a) a) observers shall be allowed access to the vessel personnel and to the gear and equipment;
 - b) b) upon request, observers shall also be allowed access to the following equipment, if present on the vessels to which they are assigned, in order to facilitate the carrying out of their duties provided in paragraph 2;
 - i. satellite navigation equipment;
 - ii. radar display viewing screens when in use; and
 - iii. electronic means of communication.
 - c) ensure that masters, crew and vessel owners do not obstruct, intimidate, interfere with, influence, bribe or attempt to bribe an observer in the performance of his/her duties.

Obligations of LSTLV during transshipment

- 7. Observers shall be allowed to visit the fishing vessel, if weather conditions permit it, and access shall be granted to personnel and areas of the vessel necessary to carry out their duties provided in paragraph 2a).

8. The Executive Secretary shall submit the observer reports to the IOTC Compliance Committee and to the IOTC Scientific Committee.

ROP Consortium fees

9. ROP Consortium fees to undertake the work described under paragraphs 1, 3, 4, and 5 of Annex VI shall be financed by Indonesia or through alternative funding sources. Those alternative funding sources shall not be taken from the IOTC regular budget or the ROP budget.