Commission for the Conservation of
Southern Bluefin Tuna

みなみまぐろ保存委員会

CCSBT–TCWG/2602/03

Consideration of actions related to the transhipment of SBT.

(TCWG Agenda item 2.2)

1. Introduction

This paper includes information to support TCWG discussions in support of the Compliance Committee (CC) progressing the following agreed actions:

5 a) Review if arrangements have been implemented to ensure transhipment obligations are in place and report back to the Compliance Committee (CC).
- Associated risk: Risk 5 (Non-compliance associated with transhipment obligations - both in port and at-sea).

5 b) Review what actions can be taken in the case of non-compliance of Members or NCNM Carrier Vessels and report back to the CC.
- Associated risk: Risk 5 (Non-compliance associated with transhipment obligations - both in port and at-sea).

The responsibility for completing Action 5 a) is assigned to Members, whilst 5 b) is assigned to Members and the Secretariat.

Both actions are currently planned to be progressed through 2026 with completion in 2027. So, it is proposed that discussions at TCWG will be preliminary only, with a view to supporting Member and CC delivery in 2027.

The CCSBT Transhipment Resolution was reviewed at CC 20 and is currently scheduled to be reviewed again in 2028. It is intended that work completed in support of actions 5 a) and 5 b) will help to inform this review of the Resolution by CC 23.

2. Background

Members report the systems used for controlling and monitoring transhipments, both in port and at sea, in national reports to the annual meetings of the CC and the Extended Commission (EC). This information is reported in Annex 1 of the national reports which details the MCS arrangements used to monitor SBT catch. The information reported by Members includes, inter alia, a description of the rules and processes for authorising transhipments, the systems for monitoring and recording quantities transhipped and processes to collect and validate CDS documents. This transhipment information has been reported annually by Members since it was added to the national report template that was agreed at the Nineteenth Annual Meeting of the Commission (CCSBT 19) in 2012.

At the Twentieth Meeting of the Compliance Committee (CC 20) the meeting agreed to a one-year extension to the Indonesian Transhipment trial using national observers to 31 October 2026. This extension was subject to Indonesia providing, by 31 December 2025, a detailed plan with a timeline for the development and implementation of recommendations

from the quality assurance review completed in 2025. Indonesia has submitted an 'improvement plan to strengthen the implementation of Transhipment-at-Sea Trial Project'. This plan was provided to Members as Circular #2026/01 and Indonesia's progress against this plan will be reviewed at CC 21.

Since CCSBT's Resolution on Establishing a Program for Transhipment by Large-Scale Fishing Vessels (Transhipment Resolution) was first agreed in 2006, it has contained provisions for Members and Cooperating Non-Members to authorise carrier vessels to receive SBT transhipments from Member and CNM tuna longline vessels. Authorised carrier vessels that are receiving SBT transhipments may, or may not, be flagged to a CCSBT Member or CNM. The minimum performance requirements to meet CCSBT obligations[1] require Members and CNMs to ensure that carrier vessels that are authorised to tranship SBT at sea are aware of, and will meet, their CCSBT obligations. These obligations relate to ensuring access and accommodation for observers and operational requirements, such as VMS, separate stowage of SBT by vessel, and the completion and transmission of documentation related to transhipment activities.

3. Current Member Reporting on the Implementation of Transhipment Obligations – Action 5 a)

Due to the comprehensive nature of the information on transhipment implementation already reported by Members in national reports, the Secretariat suggests that this information can continue to provide the basis of the review to support action 5 a) by CC 22 without changes. In addition to this, Indonesia has submitted its improvement plan for its trial at-sea transhipment programme and progress against this plan will also be reviewed by CC 21.

The Secretariat would welcome the TCWG's consideration of action 5 a) and whether Members believe that any additional information or evaluation, beyond what has been outlined in this paper, may be required to support this review.

4. Available Actions in the Case of Non-Compliance of Members or NCNM Carrier Vessels – Action 5 b)

As of 23 January 2026, there were 41 carrier vessels on the CCSBT authorised vessel list. These carrier vessels were mostly flagged to CCSBT Members (35 vessels), with NCNM carrier vessels flagged to Panama (4 vessels) and Singapore (2 vessels) also authorised by CCSBT Members.

The specific action that can be taken in the case of non-compliance by authorised Member or NCNM flagged carrier vessels will depend on the flag of the vessel (Member or NCNM), the type of non-compliance, how the non-compliance is discovered and where the carrier vessel is located at the time the non-compliance is discovered (e.g. in port – Member or NCNM - or at sea). In addition, carrier vessels that are not CCSBT authorised, but that are authorised in other RFMO areas, may also be in breach of the requirements of the CCSBT transhipment measure should they be involved in the unauthorised transhipment of SBT.

Members are reminded that in 2025 Paragraph 14 was added to the IOTC Transhipment CMM which states:

[1] Whilst CPG1 specifies 'requirements', it is a non-binding document.

"There shall be no additional or new authorisation to carry out transshipment for carrier vessels not flagged to Contracting Parties or Cooperating Non-Contracting Parties of the IOTC that were not already listed on the IOTC Record of Authorised Vessels on 1 April 2025."

The CCSBT Resolution already includes the provision that Members and CNMs shall ensure they "do not authorise Carrier Vessels not already authorised by another RFMO". So, Paragraph 14 in the IOTC measure will, by default, limit the NCNM carrier vessels that can be authorised to tranship SBT in the Indian Ocean.

Given the scope of possible carrier vessel non-compliance that may be encountered, the Secretariat recommends that TCWG may wish to identify some priority areas to focus work under this action on. Because of the lack of CCSBT visibility over their activities, the Secretariat suggests that, overall, the greatest compliance risk for CCSBT comes from carrier vessels authorised in other RFMO, but not authorised in CCSBT, being involved in unauthorised transhipments of SBT. The Secretariat notes that in further focussing this action on the areas of greatest concern, TCWG may also benefit from discussion on the controls implemented by Members that currently authorise NCNM flagged carrier vessels.

5. Summary

The Secretariat invites Members to:

- Consider the comprehensive reporting already provided by Members on systems used for controlling and monitoring transhipments (including the additional reporting by Indonesia related to its improvement plan);
- Assess whether the CC assessment of the Member systems and arrangements for controlling and monitoring transhipments would benefit from additional reporting or analysis; and
- Identify any priority areas to focus the work undertaken to support CC delivery of action 5 b) – review of action that can be taken in the case of non-compliance of Members or NCNM Carrier Vessels - in 2027.

Prepared by the Secretariat