Commission for the Conservation of
Southern Bluefin Tuna

みなみまぐろ保存委員会

CCSBT–CC/2610/06

Review of Implementation of Indonesia's and South Africa's Corrective Actions & Indonesia's Compliance in 2025

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 from CC 20

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. CC 20 made the following recommendations related to corrective actions which were endorsed at CCSBT 32:

- *Continue its support for the payback plan for Indonesia* (**Attachment A**) *and that Indonesia will provide, by 31 December 2025, a detailed plan with a timeline for implementation on measures it will take to improve its collection and reporting of artisanal catch and how the current discrepancies between REEFs and CMFs will be minimised.*
- *That the EC agree to a one-year extension of the Indonesian at sea transhipment trial to 31 October 2026, subject to Indonesia providing by 31 December 2025 a detailed plan and timeline for the implementation of measures to address the key recommendations from the QAR.*
- *South Africa progress its Corrective Action Plan to address areas of non-compliance.*

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 Annual Review of Compliance (Indonesia)

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 allowance[1]. CCSBT 30 noted the annual review of compliance would include evaluation of performance against obligations, including in areas such as catch against allocation, transhipment, CDS, management of small-scale fisheries, data exchange requirements, and observer requirements[2]. To help formulate the Compliance Committee's advice to CCSBT 33, 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 2025 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 Catch[3] in both its 2019 and 2020 fishing seasons[4]. Indonesia's combined 2019 and 2020 over-catch was 456.584t. CCSBT 27[5] 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 28[6] (**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 (2025 and 2026)

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

2025 Season

After taking into account its 2025 payback instalment (91.3t), Indonesia's Total Available Catch for 2025 was 1,244.7t[7]. Indonesia's reported catch of SBT for 2025 was 1,192.2[8]. This is 52.5t below its Total Available Catch for 2025.

[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 2025.

[8] Taken from Indonesia's monthly catch reports submitted for 2025 and based on revised figures provided to the Secretariat on 4 September 2026.

Table 1

2025 – Indonesia *(as at 04/09/2026)*	**Unit: Tonnes**[9]
A. Total Available Catch	1,244.70
B. Reported Catch – Catch by Vessel	1,192.22
C. Reported Catch – CTF Data	1,153.09[10]

In recent years Indonesia has started reporting a small amount of artisanal catch. At CC 20, Indonesia stated that:

> *"It sets aside 5% of its national allocation for artisanal catches, but it is challenging to incorporate artisanal catches into the CDS and provide CDS tags since landings occur in sites where there are no validators or enumerators. Currently data for 10 artisanal vessels are collected but it believes that there are many more than that. Artisanal catches are typically not export standard and are for local consumption"*[11]

The Secretariat has previously reported that CDS data related to these artisanal catches was received late, usually after the year of harvest had concluded. At the time of completing this paper, no CDS data has been received related to this artisanal catch during 2025. During discussions with the Secretariat, Indonesia has described challenges in obtaining tags for artisanal caught SBT. This is because the CCSBT tags are all currently purchased by the Indonesian fishing industry, and therefore the Indonesian Government does not possess any tags that can be provided for artisanal caught SBT and therefore need to obtain these from the fishing industry.

In catch by vessel information submitted for 2025, Indonesia has reported 19.05t of SBT catches by 78 handline vessels. This is significantly up from 2024, where Indonesia reported a small quantity of SBT landings (13 SBT, estimated whole weight 1.25t) at Pondokdadap, East Lombok (Labuan Lombok) and Cilacap by small-scale fishers. At CC20, Indonesia further state that:

> *It plans to implement port monitoring in all landing sites that have the potential to land tuna and SBT. It will still be difficult to include all artisanal catch into the CDS and seeks advice on how to report these catches.* [12]

Indonesia submitted its detailed plan as requested, which included measures it will take to improve its collection and reporting of artisanal catch. The plan includes several activities

[9] Whole weight

[10] The tagging data provided by Indonesia does not include any catch by handline (artisanal) vessels in 2025.

[11] See the second bullet point under paragraph 40 of the Report of the 20th Meeting of the Compliance Committee, 2025.

[12] See the third bullet point under paragraph 40 of the Report of the 20th Meeting of the Compliance Committee, 2025.

planned for Q1 2026 to improve catch reporting and vessel authorisations for artisanal fisheries. These included:

- Early annual coordination meeting with potential fishing port, e.g PP Sadeng, PPS Cilacap, PPP Labuhan Lombok, PPP Pondok Dadap, PPN Palabuhanratu, and one more fishing port in East Java.
- Requesting the candidate for validator to each fishing port where catch of SBT is potentially landed
- Registering CDS validators in artisanal fishing port
- Sending official letter to the head of fishing port, particularly fishing port with artisanal SBT landing, to send monthly report of SBT landing according to template provided, and send it to Directorate of Fish Resources Management.

The SBT landed by the 78 handline vessels reported during 2025 appears to have been restricted to the original three locations but also appears to principally be made up of landings at Cilacap (94% by weight and 92% by number of vessels).

In discussions with the Secretariat, Indonesia has indicated that it now has a government enumerator in Cilacap but has not been able to establish this role at the other locations which are under the control of the provincial Governments. However, despite the presence of the enumerator, the current issues with supplying tags to artisanal fishers along with minimal monitoring capacity in these locations, means that ensuring effective documentation of this catch through the CDS remains a challenge for Indonesia.

Given the continued challenges with artisanal vessel authorisations and catch reporting, the current status of the planned activities reported by Indonesia is unclear. However, Indonesia is expected to provide an update to CC 21 on the implementation of its plan.

2026 Season

According to reported monthly catches submitted for January to August 2026 inclusive, Indonesia's total reported SBT catch for 2026 is currently 357.8t. Therefore, to date, Indonesia's reported 2026 SBT catch currently remains within its 2026 Total Available Catch Limit of 1,244.7t (Table 1). However, this total only includes catch reported up until, and including July 2026. Indonesia reports its initial monthly catch totals as provisional figures and these figures generally increase significantly after the initial monthly report is submitted. Similar to 2025, Indonesia has at this stage submitted a zero monthly SBT catch for July 2026. But in 2025, the zero monthly catch reported during July subsequently increased to over 79t following later amendments. Therefore, Indonesia's 2026 SBT catch to date is expected to be a lot higher than the figure currently available from reported catches.

Based on current reported catches, there is currently no indication of a high risk of Indonesia exceeding its 2026 Total Available Catch limit of 1,244.7t. However, the delayed submission of CDS data, and later amendments to earlier reported SBT catch, make it impossible to make a clear assessment based on this data alone.

Table 2

2025 – Indonesia *(as at 31/08/2026)*	**Unit: Tonnes[13]**
A. Total Available Catch (t[13])	1,244.70
B. Reported Catch (t[13]) – up until 31 July 2026	357.81
Difference (A - B) (t[13])	**886.89**

2.3 Indonesia's Work Plan to Remain Within Allocation

At the time of completing this paper, an updated workplan had not been provided by Indonesia. Indonesia's workplan to remain within its TAC for 2025 (submitted to CC20) contains details of new updates for 2025, including the revision of its quota allocation mechanism to allow for quota to be allocated directly to vessels that have the potential to catch SBT and the development of the SBT Quota Monitoring Application System to monitor the realization of SBT quota utilization by each vessel. However, some activities in the plan, such as observer coverage and tagging control, only outline metrics or previous activity updates, and do not provide any details of planned or completed activities in 2025. The workplan also provides an update on the Fisheries Improvement Program[14](FIP) and reports that the number of vessels that were members of the FIP dropped from 362 in 2024, to 328 in 2025, but does not provide the reason for this drop or outline any potential impacts.

2.4 Summary of Indonesia's Compliance During 2025

The delays in receiving tagging data and CDS data (as discussed in Section 2.2) are not specific only 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 sought clarification from Indonesia on several occasions during 2025 on the reason for these delays in certifying tagging data but was unsuccessful in receiving a response. As noted in section 2.3, Indonesia's Work Plan to Remain Within Allocation for 2025 includes an activity to 'reduce tagging on port activities' but the workplan does not include an update on current actions or the efficacy of efforts to reduce non-compliance with catch tagging requirements.

Delays in certification of tagging data can be expected where vessels are at sea for long periods. However, Indonesian vessels often appear to be smaller vessels and vessels that are able to tranship regularly with carrier vessels that are generally only conducting short trips (the average planned trip duration in 2025 was 28 days). The table below compares the certification month and harvest month for tagging data received in 2024 and 2025.

[13] Whole weight

[14] The FIP is for all tuna longliners, not only those that are CCSBT authorised.

Table 3

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 - 2024	**15%**	**55%**	**23%**	**4%**	**3%**
Percentage of Total SBT Tagged - 2025	**5%**	**37%**	**26%**	**7%**	**25%**

In relation to the broader obligations in the CDS Resolution, Indonesia has been responsive to Secretariat outreach on the issues identified in the quarterly CDS reconciliation reports. Consequently, all issues with 2025 CDS data have been resolved and/or responded to.

REEF Overutilisation

As shown in **Attachment B** to this paper, there were 82 REEFs issued by Indonesia which contributed to overutilisation[15] being identified in 2025 on 20 CMFs. **Attachment B** only contains those REEFs where the reported quantities (which were always further processed) exceeded the weight reported on the CMF. The Secretariat identified other REEFs where overutilisation was suspected to have occurred because the weight of SBT reported on REEFs reflected a recovery rate above that which would be expected,[16] however these cases have not been included in **Attachment B**. Given this, it is therefore likely that the number of REEFs where overutilisation has actually occurred is higher than the number included in **Attachment B**.

Without applying a conversion factor to the quantities reported, the REEFs in **Attachment B** represent a total of 54.7 tonnes more SBT by weight than is reported in the preceding CMF. This difference would increase significantly if conversion factors were also applied to the reported quantities.

Below is an example of the overutilisation identified in 2025. The details included in the table are based on actual transactions but have been anonymised for this report.

Date	Document Reference	Activity	Location
December 13 2024	CMID24 – 14	Landing of 40 SBT total weight 5002 kg	Bali

[15] 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".

[16] This assessment was based on a comparison with other REEFs provided by ID where overutilisation was not evident).

December 25 2024	REID24 – 24	Reported export of Loins with the REEF noting a total weight 2500 kg. Preceding document reported as CMID24 – 14.	Jakarta
December 31 2024	REID24 – 25	Reported export of Saku with the REEF reporting a total weight 1300 kg. Preceding document reported as CMID24 – 14.	Jakarta
February 24 2025	REID25 – 25	Reported export of Saku with the REEF reporting a total weight 3243 kg. Preceding document reported as CMID24 – 14.	Bali
September 23 2025	REID25 – 26	Reported export of Otoro with the REEF reporting a total weight 619 kg. Preceding document reported as CMID24 – 14.	Bali
Summary	Four exports from two different locations in Indonesia totalling 7662kg of SBT, all recording the same preceding document that reported 5002kg GGO SBT. Without applying any conversion factor, the quantity reported in the REEFs exceeded the CMF total by 2660kg.		

Indonesia has included some planned improvements in its detailed plan requested at CC 20, with most work concentrated around the development and implementation of a CDS module within the quota monitoring application. The Secretariat did note a large decrease in the number of overutilisation issues during the second half of 2025, but it is unclear if this improvement is related to the new module, and how sustainable these improvements are.

Indonesia's Transhipment Programme

A Quality Assurance Review (QAR) was completed in 2025 in relation to Indonesia's implementation of the 2-year trial at-sea transhipment programme using national observers[17]. Indonesia submitted its detailed plan and timeline for the implementation of measures to address the key recommendations from the QAR as requested by CC 20.

The Secretariat's report on the programme is included in paper **CCSBT–CC/2610/12**. Therefore, a detailed analysis of compliance with the transhipment obligations will not be included in this paper. However, to summarise performance in 2025, some compliance issues remain, particularly around the completion and provision of the required reporting and notifications and the training of observers. The timeliness of the submission of required transhipment reporting diminished in 2025 and there are also concerns remaining with regards the ability of the current programme to provide an independent assessment of SBT transhipped. As an example, catch monitoring forms were identified in 2025 that reported quantities of SBT harvested and transhipped, when the corresponding transhipment reports recorded no SBT being transferred. A further explanation of these issues is included in paper **CCSBT–CC/2610/12**.

2.5 Conclusion Regarding Indonesia's Corrective Actions and Compliance

Indonesia's reported catch in 2025 again remained below its effective catch limit. A small amount of artisanal SBT catch has again been reported, and this has increased on previous years reported artisanal catch. But this data is principally related to landings in one location, with progress at other locations appearing to be minimal. The increase in reported catch at

[17] Paper CCSBT–CC/2410/13.

Cilacap in 2025, does raise concerns around the potential scale of the overall artisanal catch and the impact that this would have on Indonesia's total reported catch in recent years.

Whilst there have been some improvements, there appear to be continued challenges for Indonesia in monitoring catches and ensuring accurate reporting is completed for SBT harvest and transhipment activities. The uncertainty surrounding artisanal catch, delayed submission of CDS information, and the continued issues related to the overutilisation of SBT on REEFs therefore make it impossible for the Secretariat to confirm that Indonesia's catch has remained within its total allocation during 2025.

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

3.1 Background

As reported to previous CC meetings, 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 was 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.
- At CC20, it was noted that South Africa had provided its corrective action plan (included as **Attachment C**) but had not responded to the outreach from the Secretariat to be able to determine progress in implementation. South Africa reported to CC 20 that it had:
    - Commenced action on all compliance issues highlighted in its corrective action plan;
    - Assigned a designated contact point and developed an internal communication calendar, and the improvements were highlighted by its national report to CC 20 being completed and submitted on time;
    - Strengthened validator training and reduced CDS discrepancies due to applying the new conversion factors and improved process for weighing SBT;

- Established automated alerts to ensure compliance with the requirement to provide port inspection reports to the Secretariat within 14 days of inspection completion;
- Commenced work to ensure its direct ageing data would be submitted in 2026; and
- Strengthened its implementation and was committed to reporting measurable improvements.

3.2 Update on South Africa's Corrective Action Plan

The corrective action plan submitted by South Africa on 31 December 2024 is based on 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 CC[18];
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 had recorded the status as completed in the corrective action plan and the Secretariat would assess that South Africa has maintained compliance in these areas. As previously reported to the CC, South Africa has addressed the areas of data provision that had previously not been provided and has predominantly maintained its compliance with scientific data provision requirements in 2025 and 2026. Specifically:

[18] South Africa did not attend CC16 and CC17 but has attended CC meetings since CC18 in 2023.

- South Africa attended and provided a National Report to the latest meeting of the ERS Working Group (ERSWG16);
- South Africa provided a National Report to the Extended Scientific Committee in 2024 (ESC29), 2025 (ESC 30) and 2026 (ESC 31);
- 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 and 2026[19].

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	**Target Timeframe and Update (2025)**	**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.	South Africa has continued to consistently attend CCSBT meetings since CC 20.
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 in some areas and, in general, there remains a stronger correlation across different catch and CDS reporting in 2025 (although CDS estimated catch remains higher than other reports of SBT mortality). There remain discrepancies in CDS reporting that contribute to this and many of the 2025 issues identified remain unresolved and have not been responded to by South Africa.
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.	Submission of vessel authorisations improved in the last twelve months, with most 2026 authorisations received at the start of the fishing season. However, whilst no further issues arose for South Africa with regards unauthorised vessels during this period, this is only due to the submission

[19] With the exception of the provision of direct ageing data.

Area of Non-compliance	Target Timeframe and Update (2025)	Secretariat Comment
		of retrospective vessel authorisations, received after harvest, but backdated to the start of the fishing year.
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.	Many issues still remain with South Africa's data submission, including duplicate CDS documents and document numbers and discrepancies in reported weights. Some CDS forms have been provided late, or have not been received, and many reconciliation issues are still to be addressed.
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.	Twenty-two (22) inspection reports were received from South Africa in 2025, but most of these related to vessels that did not land, tranship or have SBT onboard. Of those that did report a landing or transhipment of SBT, most were received more than 14 days after the completion of the inspection. Further understanding of South Africa's compliance in this area will depend on the submission of its national report to CC 21 / CCSBT 33.
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.	No regular engagements have been able to be established with South Africa to support the implementation of its corrective action plan in the last twelve months. South Africa did engage with the Secretariat over e-mail in June 2026 with regards to a possible meeting to discuss areas of non-compliance. However, at the time of writing the paper, this meeting has not taken place.

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 CC 21:

- South Africa's compliance with scientific and ERS data provisions obligations has improved significantly, and this has been maintained in the last twelve months.
- The issues with CDS implementation and data submission continued in 2025. In addition, most of the issues identified have not been addressed or responded to. In relation to additional resourcing or support required, South Africa has noted skills development and training, and CC 21 may wish to consider these areas when discussing the Capacity Building Workplan (CC Agenda item 3.3.2, paper **CCSBT–CC/2610/07**).
- The Secretariat has received a large number of port inspection reports from South Africa in 2025, but the majority of these reports continue to relate to inspections of vessels that have not caught SBT, and those that are required to be submitted are mostly 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 continues to make difficult for the Secretariat to assess whether progress has been made in the implementation of the plan.

4. Action Required

CC21 is invited to:

- For Indonesia:
  - Review the information provided on Indonesia's implementation of its payback plan;
  - Review and discuss Indonesia's compliance with CCSBT obligations since CC 20, along with its *Detailed Plan and Implementation Timeline for Improving Artisanal SBT Catch Reporting, REEF–CMF Alignment, and the Transhipment-at-Sea Trial Project* and its progress in implementing this plan; and
  - Advise CCSBT 33 on the effectiveness of the plan to date and recommend whether the Payback Plan should remain as agreed, noting that the payback plan is due to be completed at the end of 2026.
- For South Africa:
  - Note South Africa's continued improved compliance related to the provision of outstanding data, national reports, and meeting attendance.
  - Noting that South Africa's Corrective Action Plan has not been updated since it was submitted in December 2024, discuss any additional progress in

implementing its corrective action plan that is reported to CC 21 by South Africa; and

- Make recommendations to CCSBT 33 regarding the continuation of South Africa's corrective action processes, noting the areas of continued non-compliance and potential support that can be provided through the CCSBT Capacity Building Workplan.

Prepared by the Secretariat

Attachment A

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

Attachment B

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)
CMID24 – 1	GGO	**9282.00**	REID24 – 1	SAK	5000.00	
			REID25 – 1	SAK	6030.00	**1748.00**
			Total REEF		**11030.00**	
CMID24 – 2	GGO	**8456.00**	REID24 – 2	SAK	1377	
			REID24 – 3	SAK	4121	
			REID24 – 4	SAK	2727.27	
			REID24 – 5	TR	3.83	
			REID24 – 6	FL	2731.18	**8701.55**
			REID24 – 7	SAK	2727.27	
			REID24 – 8	TR	800.00	
			REID24 – 9	NAK	1200.00	
			REID25 – 2	BM	1470.00	
			Total REEF		**17157.55**	
CMID24 – 3	GGO	**5121.00**	REID24 – 10	SAK	1320.00	
			REID24 – 10	SAK	2140.00	**5783.36**
			REID24 – 11	SAK	2700.00	
			REID24 – 12	SAK	1261.36	

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)
			REID25 - 3	SAK	3483.00	
			Total REEF		**10904.36**	
CMID24 – 4	GGO	**231.00**	REID24 – 13	SAK	150.00	
			REID25 – 4	SAK	150.00	**69.00**
			Total REEF		**300.00**	
CMID24 – 5	GGO	**1256.00**	REID24 – 14	NEG	727.27	
			REID25 – 5	TR	499.00	
			REID25 – 6	SAK	818.18	**1107.45**
			REID25 – 7	TR	319.00	
			Total REEF		**2363.45**	
CMID24 – 6	GGO	**315.00**	REID24 – 15	SAK	228.00	
			REID25 – 8	SAK	204.00	**117.00**
			Total REEF		**432.00**	
CMID24 – 7	GGO	**5654.00**	REID24 – 16	SAK	1700.00	
			REID24 – 16	LOI	1681.82	
			REID24 – 17	SAK	1245.46	**2645.28**
			REID25 – 9	SAK	3672.00	
			Total REEF		**8299.28**	
CMID24 – 8	GGO	**2254.00**	REID24 – 18	TR	1158.00	**1963.55**

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)
			REID24 – 19	NEG	1000.00	
			REID24 – 19	SAK	204.55	
			REID24 – 20	KIR	555.00	
			REID25 – 10	SAK	1300.00	
			Total REEF		**4217.55**	
CMID24 – 9	GGO	**315.00**	REID24 – 21	SAK	226.54	
			REID25 – 11	SAK	204.00	**115.54**
			Total REEF		**430.54**	
CMID24 – 10	GGO	**2355.00**	REID24 – 22	LOI	1600.00	
			REID24 – 23	GGO	2355.00	
			REID25 – 12	SAK	1527.00	**3357.00**
			REID25 – 13	TR	230.00	
			Total REEF		**5712.00**	
CMID24 – 11	GGO	**2610.00**	REID25 – 14	TR	909.09	
			REID25 – 14	NEG	436.36	
			REID25 – 15	NEG	1450.00	
			REID25 – 16	SAK	998.00	**3861.45**
			REID25 – 17	NEG	1950.00	
			REID25 – 18	SAK	728.00	
			Total REEF	TR	**6471.45**	
CMID24 – 12	GGO	**6111.00**	REID25 – 19	TR	909.09	**836.45**

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)
			REID25 – 19	NEG	436.36	
			REID25 – 20	SAK	1996.00	
			REID25 – 21	SAK	2006.00	
			REID25 – 22	SAK	1600.00	
			Total REEF		**6947.45**	
CMID24 – 13	GGO	**2044.00**	REID25 – 23	NEG	950.00	
			REID25 – 24	SAK	1150.00	**56.00**
			Total REEF		**2100.00**	
CMID24 – 14	GGO	**5002.00**	REID24 – 24	LOI	2500.00	
			REID24 – 25	SAK	1300.00	
			REID25 – 25	SAK	3243.00	**2660.00**
			REID25 – 26	TR	619.00	
			Total REEF		**7662.00**	
CMID24 – 15	GGO	**5015.00**	REID24 – 26	LOI	2500.00	
			REID24 – 27	LOI	2500.00	
			REID24 – 28	SAK	1545.46	**7031.46**
			REID25 – 27	SAK	3251.00	
			REID25 – 28	BM	2250.00	
			Total REEF		**12046.46**	
CMID24 – 16	GGO	**4416.00**	REID25 – 29	SAK	2500.00	**3237.00**
			REID25 – 30	SAK	1890.00	

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)
			REID25 – 31	SAK	2834.00	
			REID25 – 32	TR	429.00	
			Total REEF		**7653.00**	
CMID25 – 1	GGO	**5010.00**	REID25 – 33	SAK	1990.00	
			REID25 – 34	SAK	3275.00	
			REID25 – 35	LOI	2909.00	**6173.35**
			REID25 – 36	TR	349.00	
			REID25 – 37	SAK	2660.35	
			Total REEF		**11183.35**	
CMID25 – 2	GGO	**5000.00**	REID25 – 38	SAK	1860.00	
			REID25 – 39	SAK	2750.00	
			REID25 – 40	SAK	1452.00	**3275.00**
			REID25 – 40	CUB	1814.00	
			REID25 – 41	TR	399.00	
			Total REEF		**8275.00**	
CMID25 – 3	GGO	**5000.00**	REID25 – 42	SAK	1300.00	
			REID25 – 43	SAK	2331.00	
			REID25 – 44	LOI	2727.27	**1947.27**
			REID25 – 45	TR	250.00	
			REID25 – 46	TR	339.00	
			Total REEF		**6497.27**	

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)
CMID25 – 4	GGO	**139.00**	REID25 – 47	SAK	63.64	
			REID25 – 48	SAK	90.00	**14.64**
			Total REEF		**153.64**	

Attachment C

SOUTH AFRICA'S ACTION PLAN TO ADDRESS ITS NON-COMPLIANCE (SUBMITTED 31 DECEMBER 2024)

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.