Commission for the Conservation of
Southern Bluefin Tuna

みなみまぐろ保存委員会

CCSBT–CC/2610/12

Report on the Indonesian Trial at-sea Transhipment Observer Programme

1. Introduction

The *Resolution on Establishing a Program for Transhipment 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 transhipments at sea to specified wooden Indonesian-flagged Carrier Vessels for a two-year trial period. The twentieth meeting of the Compliance Committee (CC 20) subsequently recommended a one-year extension to the trial, with a further review to be conducted at the twenty-first meeting of the Compliance Committee (CC 21).

The purpose of this paper is to report back on the Secretariat's monitoring of the performance of Indonesia's trial at-sea transhipment observer programme 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 QAR to independently assess the performance of the trial. This recommendation was endorsed at Extended Commission of CCSBT30, and the trial commenced on 1 November 2023.

A Quality Assurance Review (QAR) of Indonesia's transhipment programme was completed in 2025 and the findings of the QAR were presented to CC 20. The meeting agreed to recommend a one-year extension to the Indonesian Transhipment trial to 31 October 2026, subject to Indonesia providing, by 31 December 2025, a detailed plan with a timeline for the development and implementation of recommendations from the QAR, including;

- A policy on the Indonesia National Observer Programme, covering, among other things, roles, responsibilities and accountability;
- An Observer Manual (similar in style and content to the IOTC ROP Manual) to serve as a reference guide to observers on data collection protocols, compliance monitoring and processes to complete forms (including a Transhipment Details Form and Boarding Inspection Report Form);
- Dedicated training for transhipment observers on SBT species identification and CCSBT Resolutions, particularly the observer-related compliance monitoring requirements of the Transhipment and CDS Resolutions;
- A robust, practical process to independently estimate the weight of individual SBT; and

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

- Stronger communications arrangements to better meet reporting obligations (e.g. satellite communications to support the submission of transhipment declarations within 24hrs).

Indonesia submitted its plan on 30 December 2025, and this was subsequently provided to Members as Circular #2026/01. The Plan, as it relates to strengthening the implementation of Transhipment-at-Sea Trial Project, is also included as Appendix One to this report. CC 20 agreed that Indonesia's progress against the plan will be reviewed at CC 21.

3. Secretariat Report on its Monitoring against Obligations

As required in the Transhipment 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 transhipping activities transmitted as a summary every 5 days (five-day reports).
- Transhipment Declarations for completed transhipments involving SBT.
- Observer Reports where the trip included transhipment involving SBT.

As reported to previous Compliance Committee meetings, the Secretariat continues to securely store all information received from Indonesia related to the transhipment trial.

3.1 Level of Transhipment Activity

The Secretariat received 132[2] deployment requests for trips leaving port between 1 January 2025 and 31 December 2025. This is consistent with the number of transhipment deployments received for the 2024 calendar year. Deployment requests received during this period have included almost 2,000 planned transhipments, of which 1,106 were able to be confirmed by observer five-day reports. This is an increase of around 35% on the recorded transhipments undertaken during 2024[3]. Of these confirmed transhipments, at the time of writing, transhipment declarations have been received for 981 transhipments, with transhipment declarations yet to be submitted for 125 reported transhipments (11% of the confirmed transhipments for these trips).

During 2025, there were 515 confirmed transhipments of SBT (from transhipment declarations received). However, transhipment declarations and observer reports have yet to be received for 20 of the deployments that had confirmed transhipments during 2025. All but one of these trips with missing transhipment declarations and observer reports had five-day reports that noted transfers of SBT. These trips account for an additional 112 likely SBT transhipments. Therefore, the actual number of SBT transhipments conducted by Indonesian fishing vessels during 2025 is expected to be around 627. This means that transhipment declarations and observer reports are yet to be received for 18% of the reported 2025 SBT transhipments. The transhipments with missing documentation occurred between February and December 2025 and therefore data should have been submitted for all these trips.

A total of 627 SBT transhipments during 2025 would represent an increase of around 16% on the number of reported SBT transhipments during 2024.

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[2] However, three of these trips were not completed due to bad weather, so the number of completed observer trips with departure dates during 2025 is 129.

[3] Noting that not all these transhipments involve the transfer of SBT.

3.2 Summary of Records Provided to the Secretariat

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

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

The issues with the timeliness of the provision of transhipment reports persist, notably of the 515 transhipment declarations received for transfers of SBT:

- All transhipment declarations have been received late, with these received on average 84 days late (up from 34 days late for transhipments completed during 2024).
- Observer reports contain details of a total of 513 SBT transhipments, with two SBT transhipments for which transhipment declarations were received not being included in observer reports. There were also three instances where catch attributed to a vessel on a transhipment declaration appears to have later been attributed to another vessel in the observer report.
- Complete documentation for observer deployments 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.
- Discrepancies and inconsistencies still exist between different data sources.

3.3 Transhipment Matching with Catch Monitoring Forms

Table 1 below shows a comparison of weights reported from transhipment reporting (observer reports and transhipment declarations) and weights reported as transhipped on catch monitoring forms (CMF) for the 2025 calendar year[4].

Month	Weight of SBT on Catch Monitoring Form	Weight of SBT on Transhipment Declaration	Weight of SBT Observer Report
January	74974	76670	76840
February	57412	51771	52249
March	18349	21560	20074
April	20571	18975	20210
May	2589	2380	2420
June	6422	6205	5419
July	20387	17835	18175
August	38395	37885	38035
September	57564	34445	34833
October	63436	55281	56385
November	134372	97576	101292
December	49704	73227	76677
Grand Total	**544175**	**493,810**	**502609**

Table 1: A comparison of weights reported by Indonesia on CMFS, Transhipment Declarations and Observer reports by month during 2025.

[4] The CMFs are sorted by month based on the date the transhipment information on the CMF is signed by the fishing vessel master. This should make all the CMF information align with the month of the transhipment declaration/observer reported transhipment.

In most months, the SBT weights reported on CMFs exceeds the weight recorded on transhipment declarations and there is an overall difference of 50,365kg between these records for the year. This discrepancy is expected, given the number of 2025 transhipment declarations and observer reports (discussed in Section 3.1) that have not yet been submitted to the Secretariat. However, in March 2025, the weights reported on transhipment declarations already exceeds those reported on CMFs and there are transhipment declarations yet to be provided for thirteen (13) additional SBT transhipments reported this month. This discrepancy, where the transhipment declaration weight is higher than the CMF is unexpected and highlights some inconsistencies between CMFs and transhipment declarations that persist in the reporting.

There were 497 CMFs issued by Indonesia that reported transhipments during 2025. Of these, 439 (88%) were able to be matched with a transhipment reported on a transhipment declaration[5]. Another 27, were able to be matched with transhipments reported on five-day reports, but for which the Secretariat is yet to receive the required transhipment reporting. This leaves 31 CMFs that reported transhipments (6%) that were unable to be matched to any reported transhipment.

Of the 439 CMFs that were able to be matched with a transhipment declaration, there is generally good correlation between the total monthly weights reported on both documents. However, the complete package of transhipment data reports is still being submitted well after the trip has been completed and can still often include revisions to previous reporting. It is unclear how much the CMF reporting may be the basis for any of these revisions. If this were to be the basis for alterations, then strong correlation would be expected, but this would also undermine the independence of the data provided by the transhipment observer programme.

Month	Weight of SBT on Matched Catch Monitoring Forms	Weight of SBT on Matched Transhipment Declarations	CMF Weight as Percentage of Weight on Matched Transhipment Declaration
January	73007	75305	97%
February	53890	52451	103%
March	16659	16360	102%
April	17318	15350	113%
May	2589	2380	109%
June	6422	5945	108%
July	17554	17275	102%
August	38395	37885	101%
September	55922	32354	173%
October	51243	50896	101%
November	93212	92276	101%
December	49704	49681	100%
Grand Total	**475915**	**448158**	

Table 2: Summary table showing by month in 2025 the weight of SBT reported on matched CMFs compared to the weight of SBT reported on the matched transhipment declarations.

[5] This matching is based on the vessels and date of the reported transhipment and does not necessarily mean that the reported quantity or weight of SBT matched.

Whilst across each month there is generally good correlation between SBT weights reported between matched CMFs and transhipment declarations, there remain more significant inconsistencies at the individual transhipment level. Of the matched CMFs, 17% report SBT transhipped weights that differ from the transhipment records by 25% or more.

There is also a significant discrepancy in September 2025, where the quantities of SBT reported as transhipped on CMFs equates to almost twice the quantities reported on transhipment declarations. A large proportion of this discrepancy is caused by four CMFs that report SBT landings in Jakarta of almost 17 tonnes that was transhipped during September 2025. Transhipment declarations and observer reports submitted for these transhipments (matched by both vessels involved and the date of transhipment) report no SBT as being transhipped in any of these events. This is summarised in Table 3 below.

Fishing Vessel	TS Declaration / Observer Report			Catch Monitoring Form		
	Received	TS Date	SBT #/ Weight	Validation Date	TS Date	SBT #/ Weight
Fishing Vessel A	04/11/2025	08/09/2025	0 / 0	15/11/2025	08/09/2025	40 / 4102
Fishing Vessel B	04/11/2025	10/09/2025	0 / 0	15/11/2025	10/09/2025	49 / 5022
Fishing Vessel C	04/11/2025	17/09/2025	0 / 0	15/11/2025	17/09/2025	31 / 3210
Fishing Vessel D	04/11/2025	15/09/2025	0 / 0	18/11/2025	15/09/2025	45 / 4617

In 2025, there was one SBT transhipment that involved a vessel that was not CCSBT authorised on the date of the transhipment. There have also been a small number of instances in 2026 where vessels have transhipped (or planned to tranship) SBT whilst not being currently authorised on the CCSBT record of fishing vessels.

4. Impacts on the Workload of the Secretariat

As noted in previous papers to the Compliance Committee, the implementation of Indonesia's trial at-sea transhipment observer programme has seen a significant increase in the amount of transhipment data and information that the Secretariat is required to manage and monitor. The previous processes used by the Secretariat to manage transhipment data were not developed to manage this volume of data, nor cater for the type of operation seen in the Indonesian transhipment programme. Because the Indonesian transhipment programme has, to date, been undertaken as a trial, the Secretariat has developed temporary processes to manage these data that were able to be accommodated within current budgetary and resourcing constraints. However, further development of the Transhipment Module, as approved by CCSBT32, was completed during 2026. This has enabled all transhipment data to be managed in the eSBT tool and it is expected that this will create some efficiencies in managing all transhipment data submitted to the Secretariat.

5. Current Conditions for the Indonesian Transhipment Trial

Paragraph 15 of the Transhipment Resolution states that:

> *The provisions in paragraph 13 will be considered as an extension to the trial that commenced on 1 November 2023. This extension shall be for a further twelve months and will conclude on 31 October 2026.*

Therefore, without further amendment, the provision in the Resolution that enables the Indonesian Transhipment Trial will expire at the end of October 2026. This will need to be considered by CC 21 when reviewing Indonesia's progress against the implementation plan submitted.

Summary

CC 21 is invited to:

- Review and discuss the improvement plan to strengthen the implementation of the Transhipment-at-Sea Trial Project that was submitted by Indonesia;
- Review and discuss the summary of data and information submitted during 2025 as part of Indonesia's trial at-sea transhipment observer programme. Specifically, the key areas where Indonesia is not fully meeting the obligations of the Transhipment Resolution; and
- Consider Indonesia's progress against the implementation plan and the current expiry of the trial on 31 October 2026.

Prepared by the Secretariat

Appendix One

Indonesia's Detailed Plan and Implementation Timeline for Improving Artisanal SBT Catch Reporting, REEF–CMF Alignment, and the Transhipment-at-Sea Trial Project

No	Issue	Detailed Plan for Improvement	Short Term		Medium Term			Long Term
			2025	2026	2027	2028	2029	2030
B. Paper Detailed Plan for trial project transshipment at sea								
1.	Strengthening the Capacity of the Observer	Training of Trainer (ToT) a. On the CMMs, particularly on the requirement for observer compliance as regulated in Transhipment and CDS Resolution b. Estimate individual weight of the SBT independently and avoid visual estimation with the approach of length-weight where each SBT is measured by its length and the weight is derived from the length itself.		Feb (by MRAG)				
		Prepare an Observer Manual as stipulated in the IOTC ROP Manual, including protocols for data collection, compliance monitoring, and form-filling procedures (including Transhipment Declaration Form and On Board Inspection Report).						
		Conduct specialized species identification training, particularly on distinguishing Southern Bluefin Tuna (SBT) from other tuna species		Q1				
		Electronic Monitoring Workshop by CCSBT.	Oct					
		Electronic Monitoring Workshop by CCSBT (Second Phase).						
		Additional Electronic Monitoring Workshop by New Zealand (will be discussed next on the October EM WS)						
		National Observer Certification and International Observer Certification by conducting certification process and observer accreditation regularly together with international agency and strengthen the cooperation with fisheries university to have qualified observer.						

No	Issue	Detailed Plan for Improvement	Short Term		Medium Term			Long Term
			2025	2026	2027	2028	2029	2030
2.	Observer Independency	**Form T4 (transhipment details form) mandatory to be fulfilled, proposed activities:**						
		1. dissemination or training for the observer, fishing master, business owner, fisheries association, and inspectors						
		2. completion of the T4 form by the observer						
		The T5 Form must be completed and signed by both the Master and the Observer to indicate that the vessel compliance inspection has been completed. All fields in the form must be filled in, including the date of the most recent logbook entry. Ideally, a photograph of the latest logbook entry should be attached as evidence of the inspection. Proposed activities:						
		1. Outreach or training for Observers, Masters, business operators/vessel owners/company management/associations, and inspectors.						
		2. completion of the T5 form by the observer and fishing masters						
		Physically signing the observer report. Currently, observer reports are submitted as unsigned Word documents, often with revisions attached.						
		1. Outreach or training for Observers, Masters, business operators/vessel owners/company management/associations, and inspectors.						
		2. Physically signed the observer report						

No	Issue	Detailed Plan for Improvement	Short Term		Medium Term			Long Term
			2025	2026	2027	2028	2029	2030
		R2 detailed report could be reported directly between the observer and DGCF rather than through the company. Proposed activities:						
		Optimizing e-OBOR application: expediting the development and the development the features including notification, data validation, real-time reporting based on digital application (e-OBORO) to improve the data accuracy.						
3.	**Other measures to strengthening compliance with other components of the CCSBT Transhipment Resolutions**	Indonesia needs to reduce the change towards the submitted form to the CCSBT Secretariat. In normal condition, the change is not needed for Deployment Request, TD, R2, and observer report.						
		Develop a system to stipulate national regulation including *prior authorization for transhipment at sea* according to clauses 19 and 20 of the Transhipment Resolution. Proposed activities to revise national regulation as follows:						
		1. Propose the regulation to be included in national legislation program list (developing initial draft and technical assessment)						
		2. discussion and public consultation						
		3. Harmonization among ministries and the Presidential approval process of the Republic of Indonesia						
		4. Establishment of regulations and dissemination (socialization)						
		5. Implementation and evaluation of challenges related to Prior Authorization						

No	Issue	Detailed Plan for Improvement	Short Term		Medium Term			Long Term
			2025	2026	2027	2028	2029	2030
		Parties involved in the transshipment pilot project should be encouraged to establish stronger communication arrangements **in order to better fulfill reporting obligations.** This includes, for example, the use of satellite communication such as Starlink to support the submission of transshipment declaration (TD) reports within 24 hours. A phased approach to the provision of satellite communication facilities is proposed as part of the activities						
		Vessel involved in *Transhipment-at-Sea Trial Project*						
		Carrier vessel in the Indonesia FMA						
		Fishing vessel with particular fishing gear						
4.	**Observer Safety**	Observers must be provided with the following equipment: 1. **Personal Location Beacon (PLB – i.e. a personal EPIRB)** Current models are available that are integrated with AIS-based man-overboard devices, which can potentially facilitate faster rescue in man-overboard situations. 2. **Personal life jacket** Easy to wear while working on deck. 3. **Two-way satellite communication device** For example, Garmin inReach. 4. Diving suit/wetsuit						
		DGCF and the fishery company shall ensure the number of crew on board, not to be exceeded than allowed numbers by laws.						

No	Issue	Detailed Plan for Improvement	Short Term		Medium Term			Long Term
			2025	2026	2027	2028	2029	2030
		Valid and applicable safety and health certificate for all observers.						

Note:

Green: MRAG recommendation
Blue: observer development assessment