PROGRESS ON THE DETAILED PLAN AND TIMELINE FOR IMPROVING ARTISANAL SBT CATCH REPORTING, REEF–CMF ALIGNMENT, AND THE TRANSHIPMENT AT-SEA TRIAL PROJECT

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Summary

Indonesia has continued to make progress in addressing the compliance matters identified by CC20 and the QAR, including:

- Artisanal SBT catch reporting: Continued efforts to strengthen CDS validation, vessel registration, catch reporting, and the provision of SBT tags, including through enhanced validation capacity at landing sites.
- REEF–CMF alignment: Development of a CDS module linked to the landing system to further improve data validation and consistency, alongside ongoing coordination on data exchange between the Indonesian Quarantine Agency and Indonesia National Single Window (INSW).
- Observer capacity and independence: Strengthening observer capacity through ToT for 10 observers, enhanced T4 and T5 reporting, and the development of e-OBOR, together with ongoing efforts to further enhance observer independence.
- Prior authorization and reporting: Continued revision of national procedures for prior authorization and enhancement of reporting through e-OBOR and satellite communication. Nineteen Carrier Vessels have been equipped with Starlink, with further efforts ongoing to ensure reliable connectivity and timely reporting.
- Observer safety: Continued strengthening of observer safety arrangements, including safety equipment, health certification, and observer management, with efforts ongoing to address the remaining equipment requirements.

In this regard, Indonesia remains committed to the effective implementation of the Detailed Plan and Timeline. In light of the progress achieved and the ongoing nature of several improvement measures, Indonesia considers that an extension of the Transhipment At-Sea Trial Project would provide a constructive opportunity to complete the remaining actions, further refine the arrangements, and demonstrate their effectiveness, taking into account Indonesia's national circumstances.

Introduction

Based on the outcomes of the CC20 meeting, several compliance issues were identified in Indonesia that require further strengthening, including discrepancies between the Re-export/Export after Landing of Domestic Product Forms (REEF) and Catch Monitoring

Forms (CMF), delays in artisanal catch reporting and vessel registration, and the implementation of the Transhipment Resolution.

CC20 also gave particular attention to the findings of the QAR of Indonesia's Trial Project on At-Sea Transhipment, which highlighted areas where further improvements could be made to strengthen the effectiveness of the trial. In this context, CC20 agreed to extend the trial for one year, until 31 October 2026, subject to Indonesia submitting a Detailed Plan and Timeline by 31 December 2025. The plan was expected to outline measures to address the identified areas, including strengthening the national observer programme, observer training and independent weight estimation, satellite communication to support timely reporting, artisanal catch reporting, and REEF–CMF data alignment.

In response to the outcomes of CC20, Indonesia developed the Detailed Plan and Timeline for Improving Artisanal SBT Catch Reporting, REEF–CMF Alignment, and the Transhipment At-Sea Trial Project to provide a structured framework for addressing the identified areas and further strengthening the implementation of relevant CCSBT requirements. The plan sets out specific actions and implementation timelines covering artisanal SBT catch reporting, REEF–CMF data alignment, the at-sea transhipment trial, observer capacity and independence, reporting systems, prior authorization, and observer safety. Progress in implementing the plan will be reviewed by the 21st Compliance Committee (CC21).

Improving Artisanal SBT Catch Reporting

- CC20 identified compliance issues concerning delays in artisanal SBT catch reporting and the registration of artisanal vessels, which require further follow-up by Indonesia. In response to these issues, Indonesia has conducted socialization on SBT management with relevant fishing ports and encouraged the appointment of CDS validators to support catch reporting and validation. A CDS validator from Cilacap Oceanic Fishing Port was registered with the CCSBT Secretariat on 5 March 2026, while efforts are ongoing to strengthen CDS validation capacity at fishing ports under the authority of provincial governments. Cilacap Oceanic Fishing Port has also submitted its monthly artisanal SBT catch report for August 2026, which was subsequently forwarded by MMAF to the CCSBT Secretariat. In addition, Indonesia is currently collecting and verifying 2026 artisanal vessel data for subsequent submission to the CCSBT Record of Authorized Vessels. However, the assignment of CDS validators at provincially administered landing sites requires appropriate central government funding arrangements. Indonesia is continuing to address this matter through domestic coordination.
- To further strengthen the CDS validation process, Indonesia is working to increase the availability of CDS validators at landing sites under provincial government authority. However, the assignment of validators at these sites requires appropriate

central government funding arrangements. Indonesia is continuing to address this matter through domestic coordination to strengthen validation capacity and support more timely and consistent artisanal SBT catch reporting.

- Indonesia has been able to provide 50 SBT tags, which were provided by the association as an initial allocation, with additional tags to be provided as needed. These measures are intended to improve the timeliness, completeness, and traceability of artisanal SBT catch reporting. However, the continued provision of tags for the artisanal fishery remains subject to certain challenges. Government procurement of tags is currently constrained by state budget and non-tax state revenue regulations, as government-provided tags may be considered a form of subsidy requiring a dedicated mechanism, which is currently under discussion with the Ministry of Finance.
- Indonesia is actively working to address these challenges through domestic coordination and does not intend to pass the cost of tags on to small-scale fishers. In parallel, Indonesia considers that the implementation of the CDS for the artisanal SBT fishery may need to be appropriately adapted to reflect the specific characteristics of the fishery, particularly vessels below 30 GT, which generally have no freezing capacity and primarily serve domestic consumption.

Addressing REEF–CMF Data Discrepancies

- The consistency of fish-weight records reported through the REEF and CMF has been identified as one of the compliance areas requiring further attention. To address this matter, Indonesia is developing a CDS module within the quota-monitoring application, which will be connected to the landing system to support data validation and improve consistency between REEF and CMF records. The module is designed to ensure that the REEF weight does not exceed the corresponding CMF weight. Development is ongoing, with some delays due to limited IT resources and budget considerations. To facilitate a common understanding of the CDS validation process, socialisation of the module was conducted on two occasions, on 1 and 7 September 2026, involving relevant stakeholders, including validation officers at fishing ports, fisheries associations, and fisheries industry representatives, with implementation to follow.

  Communication with the Indonesian Quarantine Agency (BARANTIN) on this matter has been initiated, and further coordination between BARANTIN and INSW is planned to identify an appropriate data-exchange mechanism.
- Meanwhile, data exchange between the Indonesian Quarantine Agency and the INSW remains an area requiring further coordination, particularly due to legal and administrative considerations affecting access to the required data. Indonesia will

continue coordinating with the relevant agencies to identify an appropriate data-exchange mechanism in accordance with applicable national regulations.

Progress Implementation of Transhipment At-Sea Project

a. Strengthening the Capacity of the Observer

- One area for further strengthening is the technical capacity of observers to effectively carry out their monitoring responsibilities. The QAR noted that observers had not yet received dedicated training on relevant CCSBT Conservation and Management Measures, SBT species identification, or specific procedures for independently estimating SBT weight. In addition, a formal Observer Manual and data collection protocols were not yet in place, which could contribute to differences in the understanding and completion of monitoring forms.
- To address these areas, Indonesia has strengthened observer capacity through a Training of Trainers (ToT) conducted in Benoa, Bali, on 10–14 August 2026 by MRAG and CapFish, in accordance with IOTC standards. Ten selected observers participated in the training, which covered 14 modules, including CCSBT requirements, SBT species identification, and independent SBT weight estimation using a length–weight approach. The implementation of this ToT also fulfils Indonesia's international obligations based on Annex VI of IOTC Resolution 25/05 on Establishing a Program for Transhipment by Large-Scale Fishing Vessels, to ensure that Indonesian national observers are trained according to IOTC standards by 2026. The trained observers are currently undergoing the certification process and will subsequently be issued a training attendance certificate (ROP Training Workshop Certificate) by MRAG and CapFish.
- Regarding the Observer Manual, Indonesia has an existing technical guideline for observers under Director General Regulation No. 12/2018. As a follow-up to the QAR recommendations, Indonesia plans to update the guideline with support from BirdLife International and further develop the related data collection and reporting protocols. The updated guideline is expected to provide clearer and more consistent guidance on observer duties, data collection, compliance monitoring, and completion of relevant reporting forms. The development of the updated protocols is planned for April 2027. This revised timeline reflects the time required to secure donor funding for this activity under the BirdLife International partnership; development of the updated guideline will proceed following confirmation of funding availability.

b. Observer Independency

- Indonesia is taking further steps to strengthen the independence, objectivity, and transparency of observers in carrying out their monitoring responsibilities. The QAR identified several areas requiring further strengthening, particularly the independence of SBT weight estimation, the completion and integrity of observer reports, and the separation of observer duties from vessel operations.
- To address these areas, MMAF has conducted outreach and dissemination with observers, fishing masters, business operators, fisheries associations, and inspectors to strengthen understanding of observer duties and reporting requirements. The reporting process has also been improved through the T4 (Transhipment Details Form), particularly to better document the observer's independent estimation of SBT transhipment weights. For the T5 (Boarding Inspection Report Form), Indonesia has strengthened the completion and documentation process, with T5 forms signed by both the Master and the observer. Supporting information, including photographs of the latest logbook entry, is also being incorporated as evidence of the inspection.
- Indonesia plans to integrate the observer reporting process, including the signing of observer reports, within the e-OBOR system, replacing the current practice of submitting observer reports as unsigned Word documents.
- For R2 (5-day reports), Indonesia is developing the e-OBOR system, which has been implemented on a trial basis since 2026. The system is being developed to enable R2 reports to be submitted directly through the application and received by DGCF, thereby reducing reliance on the Carrier Vessel company in the reporting process. The e-OBOR system is also being enhanced to support notification, data validation, and real-time reporting, with full implementation targeted for 2029. However, the development of the system has experienced some delays due to limited IT resources and budget considerations. Indonesia continues to address these constraints to support the timely completion and full implementation of the system.
- Indonesia is also moving towards an enhanced observer management arrangement involving a third party in observer placement, financing, and recruitment. Under this arrangement, MMAF will focus on receiving, processing, and analyzing the required observer data. This is expected to reduce potential reliance on vessel operators and provide clearer separation between observer functions and vessel operations.

c. Other Measures to Strengthening Compliance with Other Components of the CCSBT Transhipment Resolutions

Prior Authorization

- Indonesia is taking further measures to strengthen compliance with the prior authorization requirements under the Resolution on Establishing a Program for Transshipment by Large-Scale Fish Vessels. In this regard, Indonesia is revising its national regulations to establish clearer procedures for the prior authorization of at-sea transhipment, supported by a Regulatory Impact Analysis. The regulatory revision process involves a number of administrative and bureaucratic stages, which require sufficient time to complete. Indonesia continues to work through the necessary processes to ensure that the regulatory revision can be completed effectively. These measures are expected to provide clearer procedures and strengthen the consistency and traceability of the prior authorization process. This regulatory revision is currently at the stage of internal drafting and discussion within the Directorate General of Capture Fisheries (DGCF/DJPT).

Communication and Reporting Infrastructure

- Indonesia is strengthening its communication and reporting infrastructure to improve the accuracy, timeliness, and reliability of transhipment reporting. As part of these efforts, MMAF is developing the e-OBOR application to improve reporting accuracy, reduce errors, and minimize unnecessary revisions to Deployment Requests, Transhipment Declarations, R2 reports, and observer reports.
- To facilitate timely reporting by vessels at sea, MMAF has also encouraged the use of satellite communication, including Starlink, with 19 Carrier Vessels participating in the trial already equipped with the system. These measures are expected to improve communication connectivity and support more timely and reliable submission of required transhipment information.
- However, the implementation of Starlink still faces some practical challenges, particularly regarding access provided by the industry. In some cases, observers do not have consistent access to the Starlink connection during their monitoring activities on board. This limitation may affect the ability of observers to use the system consistently for timely reporting and communication. In several other cases, the delay in report delivery was also due to disruptions in the vessel's Starlink. Indonesia will continue to coordinate with the relevant industry stakeholders to facilitate appropriate access for observers and maximize the use of satellite communication in supporting transhipment monitoring and reporting.

d. Observer Safety

- The QAR identified several areas for further improvement in observer safety, particularly regarding the availability of appropriate personal protective equipment and safety communication devices. The QAR recommended that observers be provided with a Personal Locator Beacon (PLB), personal life jacket, two-way satellite communication device, and diving suit/wetsuit. The QAR also highlighted the importance of ensuring that the number of persons on board Carrier Vessels does not exceed the legally permitted complement and that all observers hold valid and applicable safety and health certificates.
- Indonesia has assessed the current availability of observer safety equipment. At present, personal life jackets are available; however, they do not yet meet SOLAS (International Convention for the Safety of Life at Sea) requirements, while the other recommended safety equipment has not yet been fully provided. The main constraint is budget availability, as the current allocation is primarily sufficient to cover observer salaries. To address these gaps, MMAF is coordinating with the appointed observer service provider to fulfil the required safety equipment. In parallel, MMAF is transforming the observer management arrangement through third-party involvement in observer placement, financing, recruitment, and onboard monitoring. The observer management application under development will enable MMAF to verify compliance with safety requirements by the observer service provider and support follow-up where requirements are not met.
- The Personal Locator Beacon (PLB), two-way satellite communication device, and diving suit/wetsuit have not yet been provided, primarily due to budget constraints. As observer recruitment, placement, and financing are being transitioned to a third-party observer service provider, the provision of this equipment will be coordinated with the service provider, subject to further budget calculation together with industry stakeholders.
- With regard to crew numbers and applicable safety requirements, Indonesia has issued Minister of Marine Affairs and Fisheries Regulation No. 4 of 2026 on the Management of Fishing Vessel Crewing, Education and Training, Examination, and Certification of Fishing Vessel Crew, replacing Regulation No. 33 of 2021. The regulation provides requirements concerning the employment and assignment of fishing vessel crew, including provisions relating to the vessel and period of employment.
- Indonesia has also strengthened the verification of observer health certification prior to boarding. Health certificates are checked for each observer assigned to fishing and Carrier Vessels, and observers with expired certificates are not permitted to board the vessel.

e. Need for Extension of the Trial Project

Indonesia recognizes that further improvements are needed to meet the relevant CCSBT standards while ensuring that the implementation is appropriately adapted to its national circumstances. Given the differences between Indonesia’s arrangements and the MRAG-based scheme, an extension of the trial project would provide an appropriate period to further refine the system, address the remaining areas for improvement, and demonstrate its effectiveness.

In this regard, Indonesia respectfully requests that the Committee/Commission consider extending the Transhipment At-Sea Trial Project for a further period of one year, until 31 October 2027, taking into account the outcome of the related review to be conducted at the IOTC Compliance Committee and Commission meetings in May 2027, as the trial arrangements are closely linked to Indonesia's obligations under IOTC Resolution 25/05.