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

1. Executive Summary

Based on the Report of Compliance Committee Meeting of the CCSBT (CC20) on October 2nd-4th 2025 in Bali, particularly paragraph 43 and paragraph 96, Indonesia was requested to submit a detailed plan outlining that covers (i) steps to improve data collection, including the Southern Bluefin Tuna (SBT) catch reporting form for artisanal fisheries; (ii) measures to minimize the gap between the REEF document and the Catch Monitoring Form (CMF); and (iii) a strengthening plan for the implementation of the Transhipment-at-Sea Trial Project, in line with the recommendations of the Quality Assurance Review (QAR).

In response to this request, Indonesia submits this document to provide a comprehensive improvement plan, including a clear implementation timeline. The plan outlines actions to be undertaken in the short-, medium-, and long-term to enhance traceability, data accuracy, and the level of compliance with CCSBT Resolutions. The implementation of this plan is expected to strengthen Indonesia's credibility among international stakeholders and further ensure the sustainability, transparency, and effective management of Southern Bluefin Tuna fisheries.

2. Background

2.1. CCSBT Requirements

CC20 identified several key areas requiring clarification and improvement, namely:

1. Enhance the SBT collection and reporting from artisanal fisheries;
2. Improve the data consistency between REEF and CMF;
3. Submit improvement plan to strengthen the implementation of Transhipment-at-Sea Trial Project.

2.2. Current Situation in Indonesia

Indonesia is currently facing several structural challenges related to SBT monitoring and reporting. These challenges include an outdated National Catch Documentation Scheme (CDS) system, limited reporting coverage from artisanal fisheries, and the constrained capacity of the national observer programme to meet international monitoring and reporting standards.

3. Objectives of the Detailed Plan

The primary objective of this plan is to outline the improvement measures to be implemented by Indonesia in the short-, medium-, and long-term, and to clearly describe each action required to strengthen monitoring, reporting, and traceability of Southern Bluefin Tuna (SBT) utilization. The plan aims to ensure that all components of SBT management comply with CCSBT standards for both artisanal and industrial fisheries. In addition, this document serves as a strategic benchmark for relevant working units in guiding resource allocation, setting priorities, and monitoring implementation progress up to 2030 and beyond.

In response to the issues identified above, and in alignment with the CCSBT Workplan 2026, Indonesia has developed a Detailed Improvement Plan and corresponding implementation timeline covering the following areas:

- Improvement of catch data collection and monitoring from artisanal fisheries;
- Measures to minimize discrepancies between the REEF document and the Catch Monitoring Form (CMF); and
- Measures to strengthen the implementation of the Transhipment-at-Sea Trial Project, in accordance with the recommendations of the Quality Assurance Review (QAR).

The detailed plan and its implementation timeline are presented in Table 1 below.

Table 1. The Detailed Plan and 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
A. Paper Detailed Plan for REEF and artisanal fisheries								
1	**Fish weight in REEF exceeded CMF** • CDS application that used since 2015 is obsolete and unable to be upgraded due to limited technology. Thus, Indonesia is developing CDS module within the quota-monitoring application while preparing for the eCDS CCSBT to be ready and implemented. • CDS module on quota monitoring application is located inside REEF menu, fish weight in the REEF data will relate to the weight information in the CMF document to prevent the data discrepancy and the REEF data will not exceed the CMF data. • CDS module is expected to be used on Q1 2026	- Develop CDS module on quota-monitoring app	Q IV	Q I				
		- Disseminating CDS module to the stakeholder	Q IV	Q I				
		- Implementation of CDS module			Q I			
		- *Data Exchange* between Fish Quarantine Agency (BARANTIN) and *Indonesia National Single Window* (INSW) a. Coordination meeting with BARANTIN, in case the INSW data could be shared b. Request to the related unit for the data exchange on exported SBT and tagged SBT c. Two-way communication between BARANTIN and INSW		Q I				
		• e-PIT and/or PIPP						
		• Fish Quarantine Agency (BARANTIN)						

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2	**Catch Reporting and vessel registration for Artisanal Fisheries**	- 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 potentially catch SBT - 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		Q I				
		- Report monthly artisanal catch to the CCSBT Secretariat						
		- Register artisanal vessel that catch SBT to the CCSBT Secretariat (if mandatory), with some consideration for the mandatory fishing vessel data (e.g the call sign availability)						
		- Conduct coordination with fisheries port UPTs that serve as landing sites for Southern Bluefin Tuna (SBT), including the implementation of outreach/socialization related to updates to the national CDS application.						
		- SBT tag request after coordination with fisheries association and head of fishing master						

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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.						

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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						

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		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						

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		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.						

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		Valid and applicable safety and health certificate for all observers.						

Note:

Green: MRAG recommendation
Blue: observer development assessment