



CCSBT-CC/2210/07

Corrective Actions Policy: Review of Indonesia's and South Africa's Corrective Action Plans

1. CCSBT's Corrective Actions Policy (CPG3)

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. Its primary response focus is to assist Members to achieve capacity to effectively comply with CCSBT obligations.

2. Update on Indonesia's Implementation of its Payback and Management Plans

2.1 Background

Indonesia's reported SBT catch exceeded its Total Available Catch¹ in both its 2019 and 2020 fishing seasons². Its combined 2019 and 2020 over-catch was 456.584t.

In October 2020, consistent with CPG3, Indonesia submitted an initial Payback Plan to repay its 456.584t over-catch at a rate of 91.8t per year between 2022 to 2026 inclusive. This plan was agreed by CCSBT 27³. Also in October 2020, Indonesia submitted a second plan to CCSBT 27⁴ describing management measures either already in place and/or that would be introduced to ensure that its 2021 SBT catch remained within its Total Available Catch Limit.

Indonesia's 2021 Total Available Catch was 1,122.8t. Indonesia caught 1,122.715t of SBT in 2021, *i.e.* 0.085t less than its Total Available Catch, and accordingly submitted a slightly revised Payback Plan to CC16⁵ to repay its over-catch at a rate of 91.3t per year between 2022 to 2026 inclusive. This revised Payback Plan was subsequently agreed by CCSBT 28⁶ (**Attachment A**) and is currently in place.

¹ Total Available Catch means a Member's Effective Catch Limit allocation for that quota year plus any amount of unfishable 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 and/or allowances

² Indonesia's fishing season starts on 1 January and ends on 31 December

³ Refer to Attachment 8 of the 27th Meeting of the Extended Commission (EC 27's) [report](#)

⁴ Refer to Attachment 9 of the 27th Meeting of the Extended Commission (EC 27's) [report](#)

⁵ Refer to paper [CCSBT-CC/2110/19](#) (modified table in part "b" of paper) – the modification was to repay Indonesia's over-catch at a rate of 91.3t per annum between 2022 – 2026 (rather than the original 91.8t per annum)

⁶ Paragraphs 69 and 75 of EC28's [report](#)

2.2 Update on Indonesia’s Payback and Management Plans

With regard to the implementation Indonesia’s Payback Plan (**Attachment A**) the Secretariat understands that:

- After taking into account its 2022 payback instalment (91.3t), Indonesia’s Total Available Catch for 2022 is 1,031.5t⁷; and
- According to monthly catches submitted for January to July 2022 inclusive, Indonesia’s total reported SBT catch for 2022 to date is 471.355t. Therefore, Indonesia’s 2022 SBT catch currently remains within its 2022 Total Available Catch Limit of 1,031.5t (Table 1). The Secretariat expects to receive Indonesia’s monthly catch data for August before CC17 and will verbally report on any available updates.

Table 1

2022- Indonesia	Unit: Tonnes⁸
A. Total Available Catch (t ⁸)	1,031.500
B. Reported Catch (t ⁸) – up until 31 July 2022	471.355
Difference (A - B) (t⁸)	560.145

With regard to Indonesia’s Management Plan:

- Indonesia submitted an updated management plan to CC16, noting its implementation progress (paper [CCSBT-CC/2110/20](#)). This annotated plan is provided for reference at **Attachment B**.
- The Secretariat confirms that it received item 8 of this management plan, “Catch analysis by fishing area”, on 1 August 2022 (paper CCSBT-ESC/2208/Info 01).
- Indonesia has indicated that it will provide a further updated management plan to CC17.

3. Update on South Africa’s Plan to Address its Non-compliance

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 to be provided as soon as practical and no later than CC17. This recommendation was endorsed by CCSBT 28 as well as slightly modified to note that specific Members (Australia and New Zealand) had offered to provide assistance to South Africa.

The Secretariat wrote to South Africa on 26 October 2021 (with reminders in February and June 2022) to advise South Africa of the matters on which it had been found non-compliant and to request that South Africa provide its plan within the timeframe specified by CCSBT 28.

Issues of non-compliance discussed at CC16 and noted in the Secretariat’s letter included that:

- South Africa had not provided data for the ERSWG Data Exchange for the last two years (2020 and 2021) and no data for the Scientific Data Exchange in 2021. South Africa also did not submit a National Report to the Extended Scientific Committee (ESC) in 2021.

⁷ Calculated by taking Indonesia’s Effective Catch Limit for 2022 (1,122.8t), and then subtracting Indonesia’s payback for 2022 (91.3t), resulting in 1031.5t of Total Available Catch for 2022

⁸ Whole weight

- South Africa had been very late with some of its other information submission requirements, including some CDS documents being overdue by six months and port inspection reports often being up to a year late.
- South Africa had often used CDS CMFs⁹ and Processed Codes that were superseded eight years ago.
- There was uncertainty regarding South Africa's total Southern Bluefin Tuna (SBT) mortalities as the CDS estimated catch was substantially higher than the catch reported in South Africa's National Report and Monthly Catch Reports. This had been the case for the past three seasons¹⁰.

At the time of finalising this paper the Secretariat had not yet received any documentation pertaining to South Africa's plan. However, the Secretariat can advise that key South African personnel visited Canberra, Australia during August 2022, in particular to:

- Discuss South Africa's CDS issues with the CCSBT Compliance Manager, and
- Meet with Australian officials to gain an understanding of Australia's Catch Documentation Scheme (CDS) systems and processes, with a view to considering how South Africa might improve its own systems and processes.

4. Summary

CC17 is invited to:

- Review the information provided on Indonesia's implementation of its payback and management plans and advise CCSBT 29 on the effectiveness of these plans to date, and propose associated recommendations if appropriate, and
- Review any plan and/or other relevant information provided to CC17 by South Africa to address its non-compliance as identified by CC16 and make recommendations to CCSBT 29 regarding next steps.

Prepared by the Secretariat

⁹ Catch Monitoring Forms

¹⁰ The 2018, 2019 and 2020 seasons

INDONESIA'S AGREED PAYBACK PLAN
(Source: Para 69, Table 3 of Report of EC of CCSBT 28)

Gradual Pay Back for Indonesia's Over-catch of 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

Work plan to remain within Indonesia's TAC for 2021

Attachment B

No	Activities	Description	Institution/Stakeholders	Period	Update Description
1	National policy in the distribution of national quota	The Indonesian Government allocates the SBT Quota to fisheries associations who distribute those quotas to their members	DGCF– MMAF	Since 2015	The Indonesian Government allocates the SBT Quota to fisheries associations who distribute those quotas to their members. The legal basis for the national distribution catch quota is Ministerial Decree No. 40 of 2021, as per May 27 th , 2021.
2	CDS application system	Implementing a quota block and prevent an over catch for the following year within the Indonesia CDS system	DGCF - MMAF	Since 2015	Implementing a quota block and prevent an over catch for the following year within the Indonesia CDS system. The Indonesian Government informs associations and fishing companies on the fishing capacity reduction before the next harvesting year
3	Observer coverage	Improve observer coverage	DGCF, RITF & Tuna Fisheries Association	2021	In 2020, number of longline vessels observed were 2 units. While in 2021 (January- August) number of longline vessels observed were 12 units.
4	Early warning system	It will regularly notify associations and fishing companies of the SBT catch status as an early warning system to avoid over-catch. Reward and punishment application towards the catch quota/vessel	DGCF & Tuna Fisheries Association	2021 (Start 1st Quarter)	DGCF is implementing early warning system in form of regular notifications to quota holders on quarterly basis. For the 1 st (January - March) and 2 nd (January - June) of 2021, notifications letters has been sent on April 14 th , 2021 and July 27 th , 2021.

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					In order to avoid over catch, DGCF will also send an additional notification letter to inform that SBT catch reach/almost reach 90% limit. There will be also a reminder to reduce/cease catch of SBT for remaining fishing season and daily information on catch level.
5	Tagging control	Reduce tagging on port activities	DGCF and Tuna Fisheries Association	2021	Reduce tagging on port activities by conducting regular dissemination to the tuna associations and companies holding quotas regarding the provisions on tagging at port.
6	E-logbook	Improve e-logbook implementation for LL vessels above 30 GT as an obligation and under 30 GT as a voluntary.	DGCF & Tuna Fisheries Association	Since 2019	<ul style="list-style-type: none"> • In 2019, there were 221 Indonesian fishing vessels registered in the CCSBT Record of Authorized Vessels with 84 vessels have implemented an e-logbook (> 30 GT). • In 2020, there were 250 Indonesian fishing vessels registered in the CCSBT Record of Authorized Vessels with 174 vessels have implemented the e-logbook (≤ 30 GT = 23 vessels; > 30 GT = 151 vessels). • In 2021 (January - August), there were 251 Indonesian fishing vessels registered in the CCSBT Record of Authorized Vessels with 191 vessels have

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					implemented the e-logbook (≤ 30 GT = 45 vessels; > 30 GT = 146 vessels).
7	E-monitoring	E-monitoring for supporting/carrier fishing vessels and LL vessel above 100 GT	DGCF & Tuna Fisheries Association	2021	Observer deployment on small longline vessels is relatively difficult due to insufficient working space and facilities for observer. As a solution, the use of electronics is being developed for monitoring activities on those vessels.
8	Catch analysis by fishing area	Data analysis of SBT catches to identify SBT was caught whether at the territorial waters, archipelagic waters, Indonesian EEZ, or high seas. The data analysis will be conducted by overlaying various data such as CDS, fishing logbooks, e-Monitoring and VMS data.	DGCF, RITF	2021	Data analysis of SBT catches to identify whether SBT was caught at the territorial sea, archipelagic water, EEZ, or high seas. The data analysis will be conducted by overlaying various data such as CDS, fishing logbooks, and VMS data
9	Market trade data	Consolidation to all market data resources	DGCF, DGPCMF, AFQ, PUSDATIN, Statistics Indonesia, Indonesia Customs	2021	MMAF has conducted a consultation process with related national export tuna data resources including Statistics Indonesia and Indonesia Customs. The result of the consultation presented in the paper (Further investigation into discrepancies between COMTRADE and Indonesia CDS data) submitted to Compliance Committee.

10	Fisheries Improvement Program (FIP) for tuna longliner	<ul style="list-style-type: none"> • Increase observer coverage. • Data collecting improvement • ERS mitigation • Improving compliance on the regulations related to longline tuna enforced by the Government • Conducting training and/or awareness activities to fishing industries to ensure compliance 	Tuna Fisheries Association	2021	<ul style="list-style-type: none"> • The FIP for tuna longliner is not only for vessel catching SBT or registered on CCSBT. • As of September 1, 2021, there are 318 longline vessels that are members of the FIP. While the vessels that have been placed observers are as many as 21 vessels. • Data collecting improvement In 2020, One Data System employs about 5,210 enumerators assigned to all over Indonesia. It increased 6% compared to 2019 (4937 enumerators). Meanwhile, there were 198 regencies which sampled for data collection during year 2020. • ERS mitigation Tuna Association has conducted training on the ERS mitigation for companies joined FIP program. • Improving compliance on the regulations related to longline tuna enforced by the Government The government collaborated with tuna association has regularly
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					<p>conducted dissemination to the quota holder company.</p> <ul style="list-style-type: none"> • Conducting training and/or awareness activities to fishing industries to ensure compliance The list of trainings which has been conducted is in the Appendix.
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Note:

MMAF = Ministry of Marine Affairs and Fisheries

DGCF = Directorate General of Capture Fisheries

DGMFRS= Directorate General of Marine and Fisheries Resources Surveillance

DGSCMFP= Directorate General of Strengthening Competitiveness of Marine and Fishery Products

DGFQ= Directorate General of Fish Quarantine, Quality Control and Safety of Fishery Products

PUSDATIN = Center for Data, Statistic, and Information, Statistics Indonesia-MMAF

RITF= Research Institute for Tuna Fisheries, MMAF

ATLI = Indonesia Longline Tuna Association