



Phase 1 & 2 combined - Trial Quality Assurance Review On behalf of the Commission for the Conservation of Southern Bluefin Tuna



Undertaken by Global Trust Certification Ltd.

Member Report: Indonesia

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Foreword Note:

This is a final report provided to the CCSBT. The relevant fishery managers of the Ministry of Marine Affairs (MMAF) and Fisheries/Directorate General of Capture Fisheries in Indonesia have been given an extended timeframe to review and respond to this final report version. At the time of release of this final report (31st August) a response to the outcome and technical content of the report had not been received.

The conclusion of the QAR Phase 1 and 2 is that Indonesia does not meet the Minimum Performance Requirements of the CCSBT.

The contents and outcome of the report are based on a review of the information available during the timeframe of the audit. SAI Global would like to acknowledge that the outcomes presented are based on our current understanding of the management system in operation and this is specific to the documentary evidence presented that demonstrates compliance to CCSBT MPR's. The review team have used the descriptive information provided during the audit as far as possible, but cannot confirm the extent to which the systems described are implemented or effective. There appears to be several fundamental weaknesses in the SBT management system operated in Indonesia. Further and substantial evidence is required to establish a greater level of compliance with the MPR's.

Executive Summary

This Quality Assurance Review (QAR) report provides an evidence-based review of a CCSBT member fishery and associated fisheries management against selected sections, as determined by the CCSBT Secretariat, of CCSBT's Compliance Policy 1, "Minimum performance requirements to meet CCSBT Obligations". QAR's consist of two phases;

- Phase 1 which was a desk based consultation which conducted between March and May 2014
- Phase 2 which was undertaken in June 2014 was an on-site inspection of the Member's MCS systems and processes documented in the Phase 1 QAR.

Member Phase 1 and 2 reviews can be conducted on separate occasions with a separate Phase 1 Report and a final combined Report to include Phase 2 or; Phase 1 and 2 reviews can be conducted concurrently and reported in a combined Report as is the case for the QAR for Indonesia.

Substantial over catches have been an occurrence over the 2011, 2012 and 2013 SBT compared with the annual allocations. These have been attributed to mainly the authorized LSTLV which operate within the association administered quota system. However, exact analysis of the over catch by vessel or vessel segment (LSTLV, tonnage classification, artisanal fleet, ports of landing) and mitigation activities specific to this were described and hence, the system is considered insufficient and does not meet the Minimum Performance Requirements of the CCSBT.

Overall Outcome:

- **There is insufficient documentary evidence available to demonstrate that the SBT management system in Indonesia meets the Minimum Performance Requirements of the CCSBT.**
- **There are fundamental weaknesses in the current management system for SBT allocation and catch accounting as evidenced in the increasing over-catches of SBT in 2011, 2012 and 2013.**
- **Most evidence presented by the management agencies was communicated verbally but with little supporting documentary evidence of its implementation and effectiveness. There are substantial over-catches of SBT on a re-occurring basis and little evidence to demonstrate how this is being corrected by Indonesia.**
- **There is a framework of relatively recent regulations and decrees which may provide a foundation for more active management arrangements to be implemented. However, the QAR notes that fundamental reform is most likely required to ensure a robust and effective system is implemented.**

The emphasis on the QAR for Indonesia has taken account of the 'Developing State' status of the Southern Bluefin Tuna (SBT) fishery management system and has endeavoured to provide detailed review of the systems and processes in place required to monitor, manage and accurately report both

industrial (LSTLV's) and artisanal catches and take this into context of Indonesia's request for consideration of its allocation.

Other outcomes of the QAR include:

- **The management agency for Indonesian fisheries, describe the capture of SBT by Indonesian fishing vessels as 'unintended bycatch' caught in other tuna fisheries (yellowfin and bigeye) (mainly from WPP-RI 573 (Indian Ocean south of Java to the Timor Sea Sawu Sea and the western part), which falls under the No. 1 CCSBT statistical area of catch).**
- **The management system does not actively manage SBT allocation and record all catches as the systems used are not effective at allocation of quota to all sectors that encounter SBT and are not able to report on all catches under CCSBT's CDS (or reports lag the required reporting timelines).**
- **The current allocation system is managed via two tuna fishery associations. They each receive 50% of the annual quota for SBT from the Ministry, although there is a significant class of vessels engaged in artisanal or coastal fishing (<30GT) that is not represented by quota holding associations. These artisanal or coastal vessels also land SBT but appear to have no quota to allocate to it.**
- **The two main tuna associations also administer the CDS forms to their members, including SBT tags. It is uncertain if/how non-members gain access to CDS and SBT tags.**
- **The percentage of quota and over –catch landed by each of the fleet segments (LSTLV's, mid-size vessels and the artisanal fleet) was not available, although the majority of SBT is reported to be caught by LSTLV's and landed at the two main fishing ports and landing statistics are available for these.**
- **There are a number of secondary ports where SBT is landed, although landing statistics were not available. A system of reporting was described for regional ports, managed through the provincial departments. This appears to lag the required reporting times considerably.**
- **More concerning, is that there is no mechanism to prevent captures and landings of SBT beyond the annual allocations, clearly evidenced by substantial over catches in 2011, 2012 and 2013.**
- **Additionally, there is insufficient evidence that demonstrates the system for monitoring, recording and verifying (over) catches is robust enough to account for all landings and within the specified time schedules for reporting. An inspection/verification system was described but there is insufficient evidence that demonstrates activity and functions and if it is effective.**
- **Registration of vessels has improved since 2012 under a Regulation of the Minister of Marine and Fisheries No: 12 / MEN / 2012 on Capture Fisheries Business.**
- **The current regulatory framework is ineffective at preventing or reducing SBT landings once Associations have reached 100% of their allocation. Legal accountability of over-catches does**

not appear to be a feature of the current system and it appears that neither vessels nor Associations can be held accountable, prosecuted for over catch or limited in operation once 100% of allocation is reached. As noted, there are weaknesses in the MCS that account for the total landings and as the majority of the CDS is administered by the associations, this may also present further challenges to the MCS and with respect to the practice of inter-company transshipments.

- It is clear that the management system for SBT in Indonesia is new and evolving. A validation and verification system has been described and there is evidence of validation of CDS at the two larger, ports where SBT is landed. Regional ports may also receive SBT which is reported through a provincial system. Whilst verification systems are described there is insufficient evidence of their effectiveness at accounting for all SBT landed catches, particularly at regional ports.

A SWOT analysis is provided in Section 5 Management System Effectiveness and Recommendations are made in section 6.

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ABBREVIATIONS - INDONESIA

| | |
|--------------|---|
| ATLI | Indonesia Tuna Long Line Association (Asosiasi Tuna Long Line Indonesia) |
| ASTUIN | Indonesia Tuna Association (Asosiasi Tuna Indonesia) |
| ASPERTADU | Integrated Capture Fisheries Association (Asosiasi Perikanan Tangkap Terpadu) |
| BALITBANG KP | Agency for Marine and Fisheries Research and Development (Badan Penelitian dan Pengembangan Kelautan dan Perikanan) |
| CCSBT | Commission for the Conservation of Southern Bluefin Tuna |
| CDS | Catch Documentation Scheme |
| CMF | Catch Monitoring Form |
| CTF | Catch Tagging Form |
| DJPT | Directorate General of Capture Fisheries (Direktorat Jenderal Perikanan Tangkap) |
| Dit SDI | Directorate of Fisheries Resources Management (Direktorat Sumberdaya Ikan) |
| EEZ | Exclusive Economic Zone (Zona Ekonomi Eksklusif) |
| GT | Gross Tonnage |
| MMAF | Ministry of Marine Affairs and Fisheries (Kementerian Kelautan dan Perikanan) |
| MPR | Minimum Performance Requirement |
| PPN | Archipelagic Fishing Port (Pelabuhan Perikanan Nusantara) |
| PPS | Oceanic Fishing Port (Pelabuhan Perikanan Samudera) |
| QAR | Quality Assurance Review |
| SBT | Southern Bluefin Tuna (Tuna Sirip Biru Selatan) |
| SIPI | Fishing Permit (Surat Izin Penangkapan Ikan) |
| SIUP | Fisheries Business Permit (Surat Izin Usaha Perikanan) |
| SIKPI | Fish Carrier Permit (Surat Izin Kapal Pengangkut Ikan) |
| TAC | Total Allowable Catch (Total Tangkapan yang Diperbolehkan ditangkap) |
| VMS | Vessel Monitoring System |
| WPP-RI | Regional Fisheries Management – Republic Indonesia (Wilayah Pengelolaan Perikanan – Republik Indonesia) |

1 Introduction

This is an evidence based Quality Assurance Review (QAR) that forms the basis for the assessment of the Commission for the Conservation of Southern Bluefin Tuna (CCSBT) Members against specific obligations from CCSBT's Compliance Policy 1, "Minimum performance requirements to meet CCSBT Obligations". Members were requested to demonstrate, by providing supporting documentation, that they meet the obligation from CCSBT's Compliance Policy, with particular emphasis on the presence of documented procedures. The scope of the assessment was limited to obligations and associated Minimum Performance Requirements in sections 1.1, 2.3, 3.1, 3.3 and 6.5 of this policy, which are aimed at ensuring Members and Co-operating Non-Members have implemented adequate measures to ensure they do not exceed their Allocation of the global Southern Bluefin Tuna (SBT) catch, are compliant with the Catch Documentation Scheme (CDS) and regulations associated with SBT transshipments. The obligations in this policy are derived from CCSBT Resolutions and Decisions, in particular:

- The "Resolution on the Allocation of the Global Total Allowable Catch"; and
- The "Resolution on Limited Carry-forward of Unfished Annual Total Allowable Catch of Southern Bluefin Tuna within Three Year Quota Blocks".
- The "Resolution on the Implementation of a CCSBT Catch Documentation Scheme".

Additional MPR's are included in 2014 which will extend the scope of both Phase 1 and Phase 2 reviews. Specifically, these are:

- 3.1 Catch Documentation System (A-F)
- 2.3 Record of Authorized Carrier Vessels (part of Transshipment Resolution)
- 3.3 Transshipment (At sea) Monitoring Program (Resolution)
- 6.5 Annual Reporting to the Compliance Committee (Suite of Decisions/Resolutions/Recommendations).

The main body of this report provides an overview of the management of fisheries of the Member participating in the QAR and the effectiveness of their fisheries management inline the Minimum Performance Requirements within the scoped of this report.

A step-by-step description of the processes and practices implemented by the Member is presented and the level of performance found against each Minimum Performance Requirement (MPR) based on the evidence collected and assessed through the QAR. A detailed Process Map is provided to support the analysis which illustrates the operating systems and processes implemented by the Member. Any areas where it was felt by the Reviewers, that the evidence reviewed did not fully substantiate full performance to the MPR are highlighted and Recommendations for improvement are provided.

In assessing the suitability of systems QARs will take into account the particular circumstances and characteristics of each Member being reviewed. QARs will also take into account any issues identified by the Compliance Committee. All QARs will provide an overall review of the Members monitoring, control and surveillance (MCS) systems however some areas may need particular attention based on the Members involved, including:

- i) **Market States** – emphasis will be placed on the systems and processes in place to support requirements for the importation of SBT products;
- ii) **Farm States** – emphasis will be placed on the systems and processes required for accurate reporting of catch, monitoring the introduction of SBT into farms including the effectiveness of the 100 fish sampling methodology and the harvesting of farmed SBT product;
- iii) **Developing States** – emphasis will be placed on the systems and processes in place required to monitor, manage and accurately report artisanal and industrial catch including to address Indonesia’s request for consideration of its allocation; and
- iv) **Distant Water Fishing States** – emphasis will be placed on the systems and processes in place for the accurate reporting of catch, recording/verifying of landing and/or transshipment and monitoring of direct exports of SBT.

1.1 Methodology

The standard format for the QAR is to conduct the review in two distinct phases, the first a desk based review with the second phase a site visit. The scope of the QAR has been extended since its inception in 2013 to encompass more CCSBT MPRs and include a phase two site visit. The methodology for each phased is shown below;

Phase 1 - an independent desk top review conducted by a review team through remote consultation stages with Member authorities to gain further evidence, seek clarification and verification of performance against the Minimum Performance Requirements of Section 1.1 of the CCSBT Compliance Policy. The review method was undertaken in four steps.

- i. Management System Review – the overall framework for management of SBT to ensure compliance with allocations
- ii. Process and implementation review – the implementation of the fishery management system (description, features, specific measures, actions, rules/regulations that allow for implementation, catch recording, catch reporting and compliance). Evidence of implementation such as specimen records, reporting and recording documents will be requested to allow verification of the system’s effectiveness to be assessed.
- iii. Management System Effectiveness - the outcome of the analysis documented using a SWOT analysis with regard to the extent that the management system implementation effectively demonstrates compliance to each of the MPR.
- iv. Recommendations for Improvement- areas identified through the review that may result in improved Member compliance (or improved reporting effectiveness for purposes of subsequent QAR activities). This is presented using the Opportunities component of the SWOT analysis.

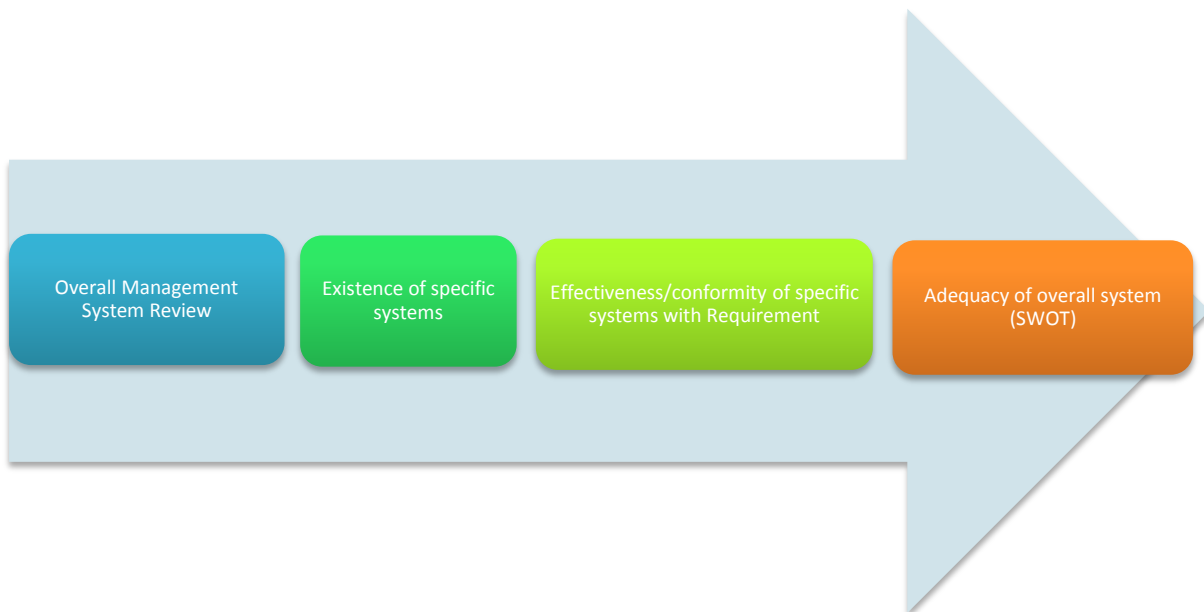


Figure 1. Methodology for Phase 1 of the CCSBT Quality Assurance Review

Phase 2 site visit - designed to verify the extent that systems and processes described in documentation and records provided in Phase 1 and the Phase 1 extension are fully implemented and consistent with the procedure described by the Member. During the site visit the reviewers will determine the extent to which the processes and activities are effective in ensuring that Members meet their obligations specific to the MPR's within the scope of the current QAR framework.

A detailed process flow map of each Member is developed to provide a 'visual' description of allocation and catch accounting systems. The process flow maps are documented initially from the desk based review and then finalized during the final reporting stage.

The report is presented in 7 Sections as follows:

- Section 1: This section, providing a short description of the process.
- Section 2: A background section that describes the fishery and the overall management system. This is supported with an organizational chart and table of identified agency roles specific to each MPR (where applicable).
- Section 3: Detailed description of the evidence that demonstrates conformity to the specific MPR requirement with a summary of outcome and key points (Phase 1)
- Section 5: Phase two findings and associated gap analysis of phase 1 and 2 outcomes.
- Section 4: A detailed flow chart to support the evaluation and provide specific details of the SBT Allocation, CDS and MCS in place.
- Section 5: Effectiveness of the Management Systems (SWOT analysis)

- Section 6: Opportunities/Recommendations for improvement
- Section 7: Appendices

N.B. A further report on the overall outcome and feasibility of the approach, method and conclusions has also been undertaken as part of the QAR work.

1.2 Summary of Activities in the QAR Phase 1 and 2 Review for Indonesia

Table 1 documents the various stages of the QAR Phase 1 and 2 reports for Indonesia. The work was undertaken by a team of assessors, led by Dr. Ronny Wahyu, based in Indonesia. Dave Garforth provided overall project management and direction extending to technical review and input into the final SWOT outcome and recommendations of the QAR.

Phase 1 and 2 were also supported by SAI Global Jakarta (Nyoman Sisula, General Manager in Jakarta and Anita Ameilia, (Training Systems Manager for ISO audit applications) and for the site visit audit for Phase 2. Sam Peacock undertook a peer review of the final Phase 1 and 2 combined report.

Table 2: Summary of the Quality Assurance Review Implementation Information: INDONESIA

| QAR Phase | Dates | Key milestones/Activities |
|-----------------------------|-----------------------------|---|
| Initiation and Introduction | January 2014 | An informal meeting with MMAF - Introducing CCSBT program to Director of Fisheries Resources Management, Ministry of Marine Affairs and Fisheries (MMAF) - Review of CCSBT program and SBT Fisheries data for Indonesia |
| MRP Review | February 2014 | - Background of southern bluefin tuna in Indonesia - Production of SBT in Indonesia - Numbers of Fishing vessels - Regional fishery management and statistical area for southern bluefin tuna - CDS (Catch Documentation Scheme) - Management regime for southern bluefin tuna |
| Consultation – Phase 1 | 5 April 2014 | - Conference call with Agencies MMAF - Information of current Management system of SBT in Indonesia - Collection system - Management system - Draft Flow chart/responses to MPR - Phase 2 audit questions/planning |
| Consultation- Phase 2 | 11 June 2014 | - Formal meeting with MMAF to discuss outcome of Phase 1 and seek clarification of conformance areas relating to MPR. |
| Report * | July 30 th 2014* | - Draft QAR sent to MMAF |
| Report returned | Early August 2014 | - Information received and further clarifications added to the QAR. |
| Consultation | Mid August 2014 | - A further meeting to discuss further clarifications on QAR information |
| Draft Report | 28 August 2014 | - Report for internal review |
| Draft Final Report | September 22nd | - Final Report |

*delayed due to awaiting information. An earlier draft had been sent to the MMAF in mid-May to support discussion and information exchange.

Figure 2: Consultation meeting at MMAF officers, Jakarta 11th June 2014.



2 Southern Bluefin Fishery

2.1 Introduction

Southern bluefin tuna (SBT) (*Thunnus maccoyii*) is a large, fast swimming, highly migratory tuna. It has become an important tuna species caught by tuna longliners in southern of Java, Indonesia.

Common fishing ports for SBT in the Indian Ocean are Muara Baru Jakarta, Cilacap, Palabuhanratu and Benoa, Bali. There are authorised Ports for landing SBT in Indonesia. These are the oceanic Fishing Port Nizam Zachman (PPSNZ), Jakarta and Benoa/Pengambengan, in Bali. Most SBT are landed in Benoa port, Bali, equating to about 85 % of the total catch of SBT in Indonesia (National Report, 2012). There are Indonesian landings in other ports that apparently represent a small proportion of the total, although the official information of the exact breakdown was not available during the review.

Management Authority

The management authority for Southern Bluefin Tuna is in the **Directorate General of Capture Fisheries (DJPT)** under the **Ministry of Marine Affairs and Fisheries of the Republic of Indonesia**. The role of the Directorate General of Capture Fisheries is the design and implementation of management regimes and regulations nationally, and international agreements.

Arrangements for the management of SBT that have been implemented by Directorate General of Capture Fisheries, Minister of Marine Affairs and Fisheries include;

- Fisheries Business License (SIUP)
- Fishing permit (SIPI) and Fish Vessel Permit (SIKPI)

Minister of Marine Affairs and Fisheries regulation No. PER30 / MEN / 2012 amended by 26 / PERMEN-KP / 2013.

The registration of Indonesian fishing vessel carrying out fishing activities, fishing or transshipment of fish in the high seas for SBT in the Indian Ocean has been set out in *Ministry of Marine Affairs and Fisheries Regulation No.12 / MEN / 2012 concerning fishing on the high seas.*

2.2 Management System

Indonesia has adopted the "Resolution on the Implementation of a Catch Documentation Scheme for the recording all of Southern Bluefin Tuna catch and trade". Indonesia is aware of the CDS policies which became effective on January 1, 2010, for any export or import activities of SBT requiring installed tags and accompanying completed CDS documentation.

The catch documentation scheme implemented by Indonesia has been described and consists of:

- 1) Catch Tagging Form (CTF),
- 2) Catch Monitoring Form (CMF),
- 3) Re-export/Export after landing of Domestic Product Form.

Completion of CDS documents has also been described with reference to the Official Validation Officer (validator) who is granted authority under the *Decree of Directorate General of Capture Fisheries NO:20/KEP-DJPT/2014 for the appointment of CDS validation for SBT*.

MMAF has described the reporting mechanisms implemented for the CDS in Indonesia as follows:

1. Compilation of CMF and CTF forms conducted by the validator
2. The validator sends the compiled CMF and CTF data to the Directorate of Fisheries Resource Management (Dit SDI) on a monthly basis. The Directorate receives this catch tagging and monitoring data from every fishing port (e.g. Pengambangan, Bali and PPSNZ Jakarta).
3. Dit SDI reviews the CMF and CTF received from the Fishing Ports, and sends the compiled data along with scans of the original forms to CCSBT on a monthly basis

Whilst not directly related to the CDS;

4. The catch of SBT is reported, captured and recorded against the quota allocation of the vessel Association. When the catch of SBT reaches 70% of the national quota allocated from CCSBT, the Directorate General of Capture Fisheries sends a notification letter to the Associations providing an 'early' warning system of impending quota completion.
5. On reaching 100% of quota allocation a further communication letter is issued to each Association.

To fulfil compliance requirements for fishing vessels that catch SBT, *Regulation No. 26 / PERMEN-KP / 2013* requires that fishing vessels >30GT have an obligation to receive on-board observers, implement the log book recording system and install a Vessel Monitoring System (VMS).

2.3 Quota Allocation

Since 2008 quota for Indonesia has been divided between two fishing associations; the Indonesian Tuna Association (ASTUIN) and the Indonesia Tuna Long Line Association (ATLI), each of which receives 50% of the total.

From that point, the system of allocation to the fishing vessels can be described as an olympic system, in that it is not based on an individual allocation per vessel or company. However, quota is only available to member vessels of one or the other Association. The authority note that the reason quota is not allocated at the vessel level is that SBT is caught as bycatch by longliners primarily targeting yellowfin and bigeye tunas.

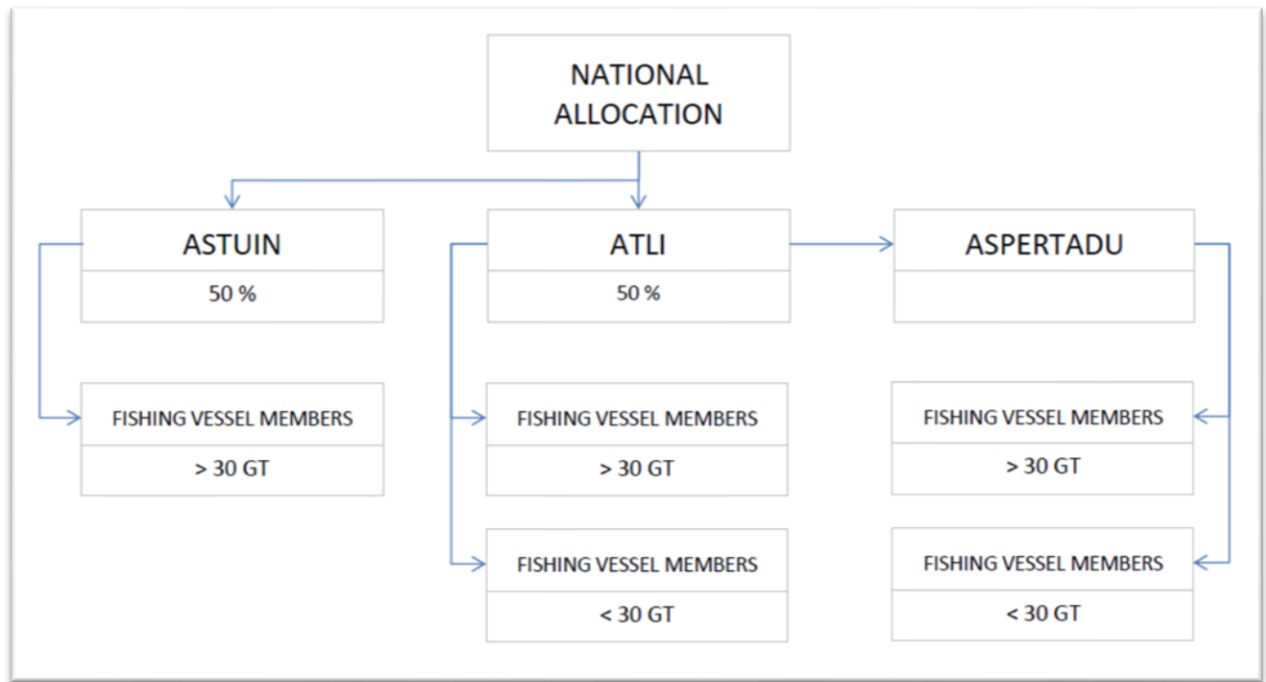


Figure 3: Allocation of Indonesian Allocated Catch via Fishing Associations

2.4 History of the Fishery

Southern Bluefin Tuna has been utilized by the countries of Japan, Australia and New Zealand as a target species in the fishery fleet operations since the early 1950s. From 1968, the Indian Ocean production decreased from 45,000 tonnes to 8,000 tonnes. Indonesian SBT fishery production data began in 1976 through Japanese market import statistics. During the period 1976 to 1987 the production of SBT Indonesia has not seen a significant increase. From 1988 the SBT production of Indonesia increased, reaching a peak in 1999 amounting to 2,504 tonnes. Catch then broadly declined with a recorded catch of 910 tonnes in 2012.

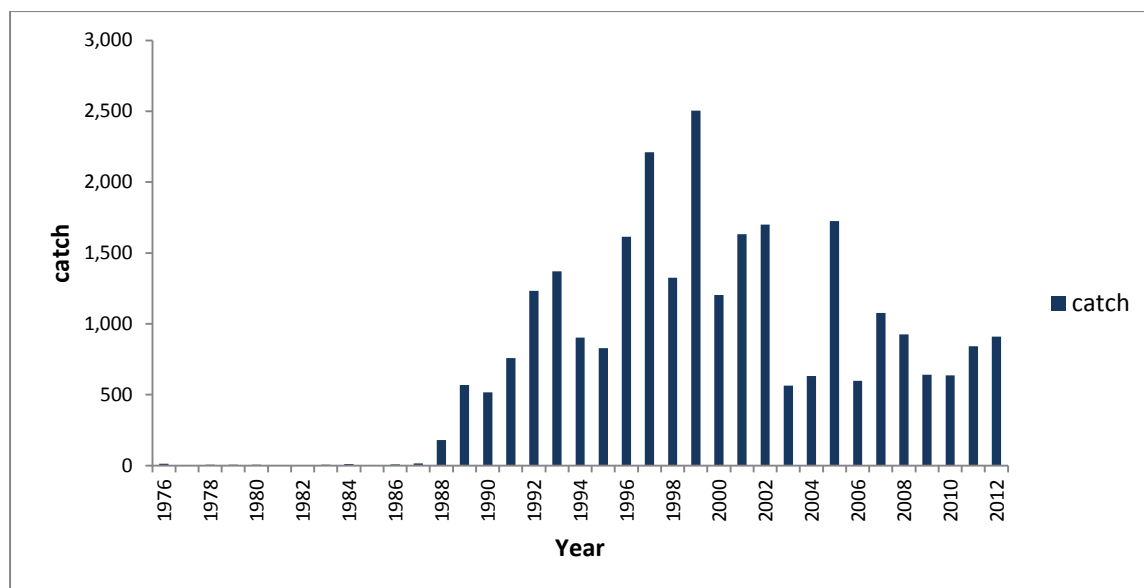


Figure 4: SBT landings by Indonesia 1998-2012. Source: CCSBT, 2013

2.5 Location

In accordance with the CCSBT SBT Statistical Document Program, there are 15 SBT statistical areas, and the coordinates of each area are shown in Table 2 below. Statistical area of catch in the waters of the Indian Ocean are located in Fisheries Management Area (WPP-573) which is a major fishing ground for tuna long liners. The Ministry of Marine Affairs and Fisheries also applies these statistical areas for SBT management in Indonesia.

Table 2 : Coordinates of CCSBT Statistical Areas

| Area of Catch | Latitude | Latitude |
|---------------|----------------|-----------------|
| 1 | 10 S - 20 S | 100 E - 130 E |
| 2 | 20 S - 35 S | 80 E - 120 E |
| 3 | 35 S - 40 S | 120 E - 140 E |
| 4 | 30 S - 40 S | S 140 E - 160 E |
| 5 | 30 S - 40 S | 170 E - 170 W |
| 6 | 40 S - 60 S | 160 E - 170 W |
| 7 | 35 S - 60 S | 120 E - 160 E |
| 8 | 35 S - 60 S | 60 E - 120 E |
| 9 | 35 S - 60 S | 40 W - 60 E |
| 10 | 35 S - 60 S | 70 W - 40 W |
| 11 | Not Applicable | Not Applicable |
| 12 | Not Applicable | Not Applicable |
| 13 | Not Applicable | Not Applicable |
| 14 | 20 S - 35 S | 20 E - 80 E |
| 15 | 20 S - 35 S | 40 W - 20 E |

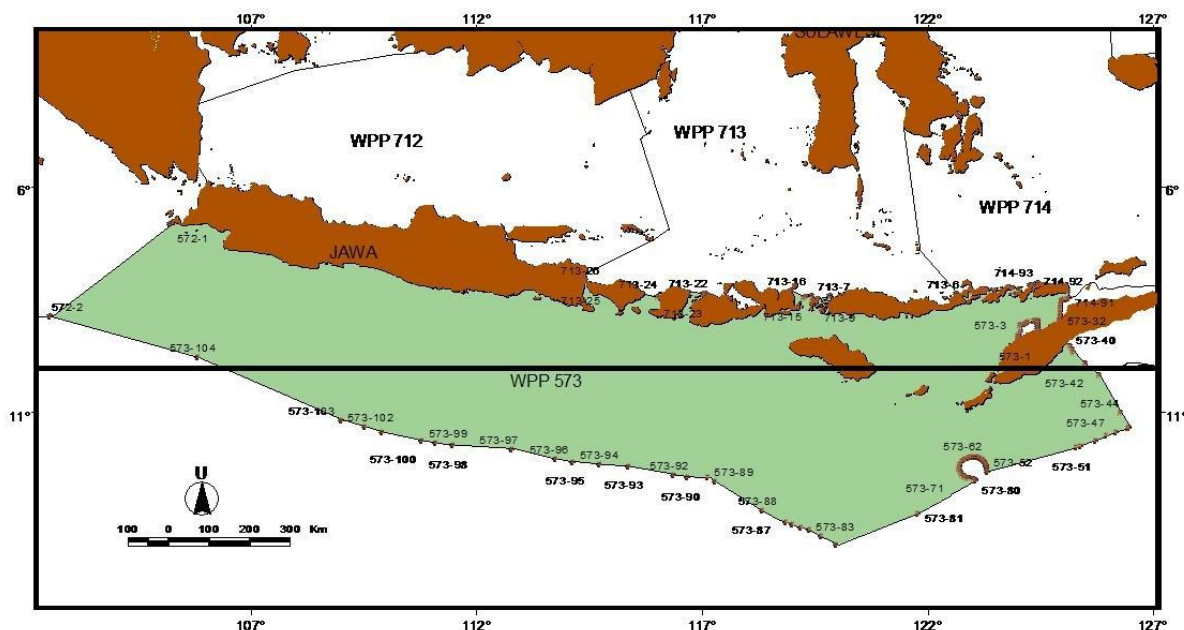


Figure 5: Illustration map of IFMZ-573 and CCSBT Statistical Area No.1

2.6 Fishery sectors

There is no farming of SBT in Indonesia.

2.6.1 Long-line Fleet

There is a large long line fleet registered in Indonesia with vessels ranging from less than 30GT up to 200GT. The fleet comprised of 272 vessels in the 2010 SBT by-catch fishery which then increased to 317 by 2012. More recently, the vessels listed on CCSBT Authorized list numbered some 279 (June 2014). Quota is not allocated by vessel, but based on a 50% allocation to each of two Fishing Associations. A list of vessel members for each of the two Associations was not available although all 317 vessels were thought to be members of either ATLI or ASTUIN in 2012. There is also an Association called the Integrated Capture Fisheries Association (ASPERDATU), although it has not been associated with allocation of SBT according to MMAF since until April 2014, and its members were not authorized with CCSBT.

The number of vessels that land SBT within each category specified by Indonesian fisheries is recorded by vessels >30GT and vessels <30GT. (Refer to Table 3). Each tuna association may have a smaller number of <30GT vessels that are members. These are required to follow the same reporting requirements for CDS as the >30GT members.

Table 3: Number of vessels that caught southern bluefin tuna from each sector

| Fishing Season | Number of vessels* | |
|----------------|--|--|
| | LONG LINE (>30 GT) | Artisanal LONG LINE (= termasuk 30 GT below) |
| 2010/11 | 272 | |
| 2011/12 | 274 | |
| 2012/13 | 317 | 360** |
| 2013*** | 258 | |
| 2014 | 279 (as of 11 th June 2014) | 107 |

Note:

*) based on CCSBT Authorised Vessel List by 31 December each year

***) Not included on the CCSBT Authorised vessel to fish for SBT

****) as of 5 September 2013

No national quota is allocated to foreign vessels in accordance with the national policy of Indonesia, who did not give authorization to foreign-flagged vessels (*Regulation of the Minister of Marine and Fisheries No. 12/2012 concerning fishing busines on the high seas*).

Minister of Marine and Fisheries Regulation No. 26/2013 concerning fisheries busines WPP-NRI. Fishery Business using fishing vessels and / or vessel transporting fish with a cumulative of >300 GT can only be carried out by an incorporated company.

2.6.2 Artisanal Fishery

Artisanal longliners smaller than 30GT are not members of the two main associations, and therefore do not receive quota allocations. There is no available list of vessels <30GT that bycatch SBT.

However, data on SBT caught by these vessels is recorded by the Provincial Government department associated with the Port of landing. Regulation of the artisanal fisheries is managed by the provincial local regulations by issuing fishing licenses (SIPI).

For all <30GT vessels a SIPI license should be issued by the Provincial government, which also requires that vessel captains fill in logbook records (PERMEN 18 th 2010).

For fishing vessels that are not listed under CCSBT but which may catch SBT as a bycatch, the CDS system is still applicable and the fish must be fitted with a tag in accordance with paragraph 4.1.3 resolution on the implementation of CCSBT Catch Documentation Scheme and as modified by 17 October 2013.

Catch reports are compiled by the national statistical system every 3 months. The catch reports are derived from production data captured in the industrial ports (Benoa and Pelabuhan, Perikanan, Samudera) by the Directorate General of Capture Fisheries. These are noted as the major landing places although SBT can be landed to a number of other ports by the artisanal fishery. For these smaller volumes, records are made by the sub-district Fisheries Extension Officers by way of monthly reports to District Fisheries Offices. The District Fisheries Offices then compile quarterly reports which are reported to the Directorate General of Capture Fisheries for compiling in the annual Indonesian fishery report.

Quarterly reports have been previously reported to include:

- i. total catch within 4 (four) months,
- ii. volume of export and locally sold,
- iii. number of issued tagging form
- iv. number of validated catch monitoring form,
- v. number of validated export after landing of domestic product form,
- vi. number of remaining tags,
- vii. list of vessels harvested SBT and
- viii. list of vessels and volume of SBT transshipment at the port (if any).

2.6.3 Recreational fishery

In Indonesia there are no recreational fisheries for Southern Bluefin Tuna.

2.7 Key Markets

Fishing season is from January 1 to December 31 each year in the form of exports of fresh and mostly exported to Japan for sashimi production, the principal market for Indonesia. Other markets include Korea, USA and others listed in Table 3. Vessels that do not exceed 15 day trips are said to be optimized for this market. Export data is provided in Table 3 (n.b. No price data were available).

In 2013, 279 tons were exported to Japan, while exports to Korea, USA and Malaysia were 4 tons, 9 tons and 0.2 tons respectively.

Table 4: Export of Southern Bluefin Tuna from Indonesia

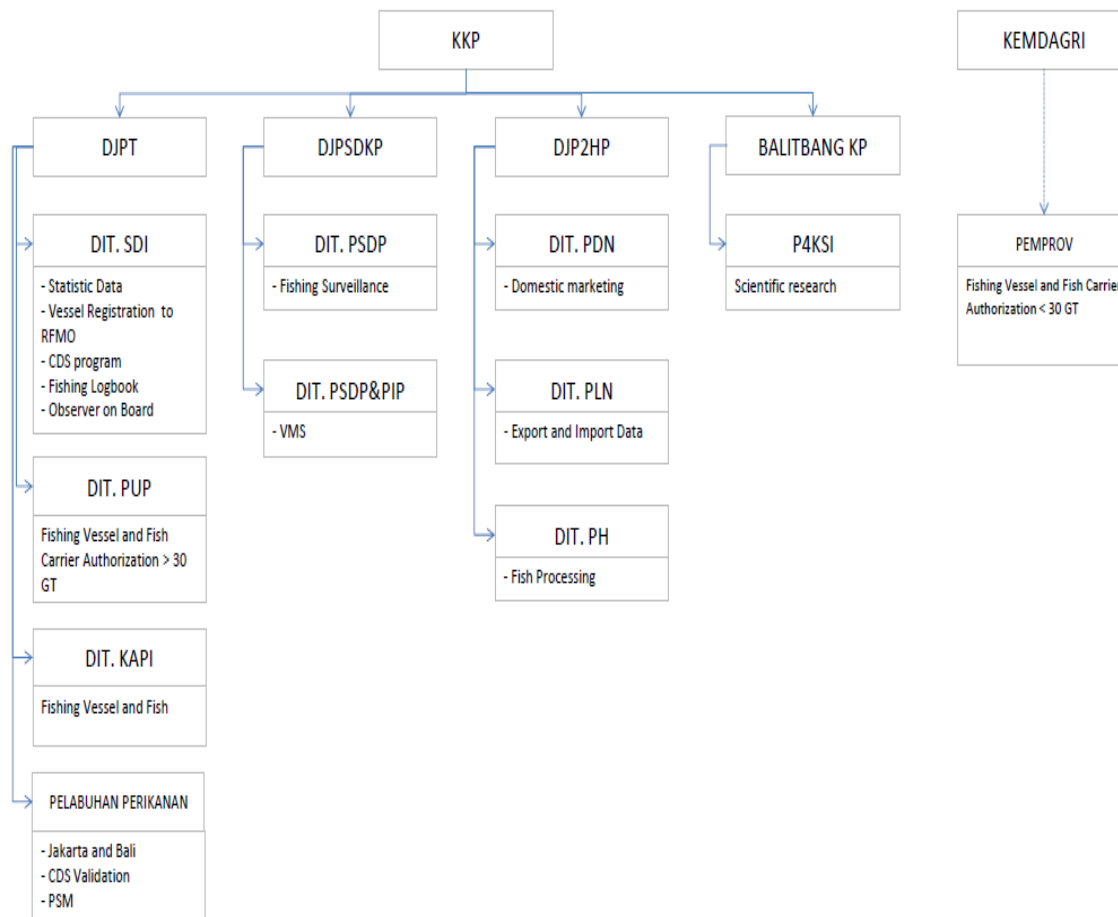
| Fishing Season | SBT Exported to (t) | | | | | | | Total |
|----------------|---------------------|-------|-----|----------|----------|-------|--------|-------|
| | Japan | Korea | USA | Malaysia | Thailand | Italy | Russia | |
| 2010 | 431 | 13 | 172 | - | - | - | - | 616 |
| 2011 | 513 | 17 | 193 | 0.4 | - | 1 | 3 | 727.4 |
| 2012 | 530 | 32 | 200 | 0.2 | 1 | - | - | 763.2 |
| 2013* | 279 | 4 | 9 | 0.2 | - | - | - | 292.2 |

Note: Export quantities (t) calculated using information from CDS Catch Monitoring Forms (using the figures for overall net weights). *data not complete for 2013.

Table 5: Management Authority responsibilities for Minimum Performance requirements

| Management Authority | Responsibilities | CCSBT MPR |
|--|---|---|
| Ministry of Marine Affairs for Fisheries (MMAF) | <ul style="list-style-type: none"> • Provide national regulation for Fisheries management • Develop policies and program to ensure the sustainability use of Fisheries resources. | 1.1(i) 1, 4, legal basis for all other MPR1 |
| Directorate General of Capture Fisheries (DGCF) | <ul style="list-style-type: none"> • Observer scheme program • Catch Documentation Scheme • Logbook • Fishing Permit • Fish Carrier permit • Fisheries Business Permit | 1.1(i) 1-4, 1.1(i) |
| Province Local Government | <ul style="list-style-type: none"> • Fishing Permit < 30GT • SIUP (Fisheries business license) • Implementation regulation from central government in terms of fishing gear regulation and fishing area | 1.1(i) |
| Directorate General of Marine and Fisheries Surveillance | <ul style="list-style-type: none"> • Vessel Monitoring System • Report from fishing vessel inspection | 1.1(i) 1-4, 1.1(i) |

Figure 6: Management System Operational Chart of Divisional Structure of the Ministry of Marine Affairs for Fisheries



3 Phase 1 Member Management System Implementation

This section is based on a review of information on management system processes, historical Member Compliance Action Plans against the 2012 quota allocation; data that demonstrates performance of compliance to date against the 2013 quota and including reference to 2014 allocation and the direct consultation with Member through conference call, e-mail exchange and the site audit with the Executive and Staff of the Ministry of Marine Affairs and Fisheries (MMAF).

2.8 Compliance with National Allocations 1 (CCSBT section 1.1(i))

The aim of this obligation is to ensure that Members do not exceed their allocated catch. MPR1 represents the over-arching requirement, with MPRs 2-4 describing subsidiary requirements.

2.8.1 MPR 1 – “Rules in place to ensure that the total ‘Attributable SBT Catch’ of each Member does not exceed the Member’s Allocated Catch for the relevant period.”

Indonesia has implemented regulations to ensure that the ‘Attributable SBT Catch’ for each member does not exceed the Allocated Catch.

- Any person conducting commercial fishing activities in the sea must have a fishing permit; referred to as SIPI (<30GT) and for carrier vessels above 30GT a SIKPI permit which regulates port of landing and transshipment (Ministry of Marine Affairs and Fisheries Regulation No. 26 / 2013 Article 15 paragraph 1). Permits are administered by central government for vessels above 30GT and by local government for vessels below 30GT.
- All other permits for a vessel to take part in a fishery are issued by the Directorate General of Capture Fisheries
- There is a formal agreement (*the Akmani Agreement*) between the Government and two Fishing Associations (ATLI, ASTUIN) which defines the allocation of the national quota. Each Association receives a 50% share, but the process by which this is further distributed within the Associations is not known. The Akmani Agreement is not supported by government regulation.
- Quota is not allocated on an individual vessel basis because SBT is caught as bycatch by longliners targeting other species.
- A third Fishing Association, ASPERTADU, has only very recently become involved with the Akmani Agreement.
- For all of SBT landed, the *Catch Documentation Scheme* (CDS) must be completed.
- There is no explicit definition for Attributable SBT catch within the Regulations although
- There has been historical overcatch of SBT as recorded in the reported landing data by MMAF. Recorded catch in 2012 was 895 tonnes, which was 210 tonnes above the allocated catch for that year and in 2011 an overcatch of 191 tonnes was recorded against an allocation of 651 tonnes (refer to table 6). In 2010, Indonesia recorded landings of 16 tonnes less than the allocation.
- Indonesia has proposed to increase its national quota and has requested an increase in allocation of 300 tons per year.

Table 6: SBT Allocated catch, National TAC, and Reported Landings 2009/10 – 2013/14 (from MMAF)

| CCSBT Year | SBT Season | Allocated Catch | National TAC | Report landing |
|------------|------------|-----------------|--------------|------------------------------|
| 2010 | 2009/2010 | 651 | 651 | 635 |
| 2011 | 2010/2011 | 651 | 651 | 842 |
| 2012 | 2011/2012 | 685 | 685 | 895 |
| 2013 | 2012/2013 | 709 | 709 | Data not available at audit* |
| 2014 | 2013/2014 | 750 | 750 | |

*September 2014 advised that Indonesia catch reported as 1,382.6 t

Prior to 2008 a less systemised quota distribution system prevailed. From 2008 to date, the MMAF has divided the SBT quota 50% for the Association of Indonesian Tuna Long Line (ATLI) and Indonesian Tuna Association (ASTUIN). The Associations only allow member vessels to fish SBT and only those vessels that are registered on CCSBT database based on Akmani Agreement dated 16 April 2013.

From Table 6, an over-catch of 200 tonnes above the national TAC and Allocation was recorded in 2012 calendar year. It is not certain to what extent the overcatch is traceable by fleet and vessel.

MMAF also note that the allocation to ATLI will be reduced by the amount of overcatch in 2011 an agreement formed with the Associations within the Akmani Agreement.

Summary

There are regulations that define the licensing and permitting of vessels that fish for tuna, of which SBT is a by-catch. The Ministry of Marine Affairs and Fisheries (MMAF) (2008-2014) divides the SBT allocation from CCSBT into two equal halves, one half each for the Association of Indonesian Tuna Long Line (ATLI) and Indonesian Tuna Association (ASTUIN). It is uncertain whether ASPERDATU will receive an allocation in future as, historically, this has not been the case.

Regulations require that any vessel that may encounter SBT to be registered in the CCSBT authorization database. However, a large component of the smaller <30GT (termed artisanal) fleet have not been registered. Larger long-liners have been registered.

Regulations have been created to enforce the implementation of the CCSBT CDS and tagging system. There appear to be gaps in the implementation of the allocation system, since smaller artisanal vessels were not registered with CCSBT and are not members of the two main Associations. Hence, any bycatch of SBT by this segment is not reported by the Associations, is not subtracted from their allocations, and therefore is not subtracted from the Indonesian national allocation. However, if the catch is sold to an Association member it could potentially be included. Additionally, as these vessels are likely to land at secondary ports, it is uncertain whether these catches are always reported on the CDS and always recorded by provincial government system.

Key points

- Every vessel must have SIPI, SIUP and SIKPI and registered in the CCSBT
- Indonesia has passed regulations to implement the Catch Documentation System for SBT which is applicable for all vessels that encounter SBT.
- MMAF note that the 200t over-catch in 2012 was from >30GT vessels fishing under the Associations.
- There is no separate catch statistic for the <30GT vessel but they are obliged to use CDS.
- There is uncertainty of how the total SBT catch for Indonesia is segmented between >30 GT and <30GT vessels.
- There are risks of overcatch of SBT due to the current method of allocating quota to each component of the fleet.

Noted:

- a) Ministry Regulation no 12 /2012 about fisheries business permit in high seas
- b) Ministry Regulation no 26 /2013 article 15 paragraph 1

2.8.2 MPR 2a(i): [Operating systems and processes established to implement annual catching arrangements, including] **Specification of allocations by company, quota holder or vessel.**

Catch quota of SBT have been distributed between ATLI (Indonesia Tuna Long Line Association) and ASTUIN (Indonesia Tuna Association) each members 50% from Total Catch Quota.

Each association distributed the quota to each fishing company and each fishing company for each fishing vessel using their own system although the system does not appear to allocate quota by company, permit or vessel.

Allocation of SBT quotas is through ATLI (Indonesian Tuna Long Line Association) and ASTUIN (Indonesian Tuna Association), which received 50% of the total national quota each. The extent to which the quota is distributed on a company, permit or vessel basis is uncertain other than the Associations use their own internal mechanisms for distribution of SBT quota, including penalties for vessels that do not abide by Association rules. The Akamani Agreement forms a basis of understanding that Associations will implement the CDS and report catches to the MMAF. However, as noted only vessels that are CCSBT authorized can declare SBT under the quota.

Summary

Allocation of Southern bluefin tuna quotas is through ATLI (Indonesian Tuna Long Line Association) and ASTUIN (Indonesian Tuna Association), each of which receives 50% of the national quota. Associations which divide the respective companies that have vessels registered in the CCSBT. Associations were reported to the Directorate General of Capture Fisheries on the quota given to the company as a member of association.

Key points

- Allocation of Southern Bluefin Tuna distributed by the Associations
- Association reported to Directorate General of Capture Fisheries using the CDS
- There is no mechanisms from Directorate General of Capture Fisheries to cross check permitted vessel receive allocation from the association and also artisanal fisheries.

2.8.3 MPR 2a (ii): [Operating systems and processes established to implement annual catching arrangements, including] Arrangements for daily recording of all catches

There are regulations in place that implement the CDS for all vessels that encounter SBT. There are operating systems to implement this on the larger (>30GT) fleet, including logbook records of daily catches and use of the CDS. For smaller vessel classifications (<10GT and <30GT), SIPI requires a fishing logbook to be completed and reported to the relevant regional office of the provincial fishery department (although to the extent to which this is 100% completed is not certain).

Noted :

Ministry Marine Affairs and Fisheries Regulation no : 18/2010 concerning Fishing Log book

Summary –

Regulations requiring that every fishing vessel (large scale and artisanal) which has a fishing permit (SIPI) is required to fill out a log book. The log book should be completed for every fishing operation before unloading catch from fishing vessel.

Key points

- Fishing license for large scale and artisanal fishers
- Implementation of fishing logbook
- Fishing Log book was reported before unloading catch
- Artisanal fisheries catches Southern Bluefin Tuna mostly in ZEE Indonesia.

2.8.4 MPR 2a(iii): [Operating systems and processes established to implement annual catching arrangements, including] Weekly reporting of catches by large scale tuna longliners and monthly reporting of catches by coastal fishing vessels.

Regulation requires that weekly reporting of catches by the >30GT longliners and monthly reporting by coastal fishers is undertaken. The validation officers collect CDS data from each vessel in the fishing port.

The landings are recorded by port by District Fisheries Officers. For smaller ports, the sub-district (Fisheries Extension) officers report fisheries production data to District Fisheries Offices every month. District Fisheries Offices then report data production of tuna to the Provincial Fisheries Offices every three months (Quarterly reports).

Fisheries production data from district and sub-district is then compiled by the Directorate General of Capture Fisheries to produce Indonesian Fisheries Statistics on an annual basis. Additionally, log book reports are maintained by vessels and recorded.

Summary – Key points

- Catch Documentation Scheme (CDS) data and logbook data is collected by the validator officer /enumerators in the fishing port
- The Fishery statistical system resolves to the port of landing, either major landing place or location of fishing (fishing villages) which are recorded by the sub-district (Fisheries Extension Officers).

2.8.5 MPR 2b: [Operating systems and processes established to], in accordance with the CCSBT timeline, monitor all fishing-related mortality of SBT.

The Fishing season for Indonesia is from January 1 to December 31 each year.

1. Catch report 1 January to 31 March must be validated by 30 June of the current year
2. Catch report April 1 to 30 June must be validated by 30 September of the current year
3. Catch report 1 July to 30 September must be validated 31 December of the current year
4. Catch report October 1 to 31 December must be validated 31 March next year

The Chief of the Fishing Port is authorized to perform validation of the CDS for each vessel on a monthly basis. CDS forms are inspected, numbered and stamped. These are submitted to the Director General of Capture Fisheries and the Directorate of Fish Resources on a monthly basis. The Officer of the Directorate of Fish Resources reviews the monthly production of SBT and submits these to the CCSBT Secretariat.

MMAF regulation has been created that requires all vessels to implement the Catch Documentation Scheme (CDS) including the Catch Tagging Form (CTF), Catch Monitoring Form (CMF) and Re-Export / Export After Landing of Domestic product Form (REEF). There is evidence of vessels completing these forms and examples provided to the review team (Refer to Appendix).

All vessels >30GT are obliged to possess a fully functional VMS. Vessels do not receive port clearance if they cannot prove they have an operational VMS onboard.

Noted :

Ministry of Marine Affairs and Fisheries Regulation No:1/2013 about Monitoring fishing vessels and fish transport vessel.

Summary –

Data of Southern Bluefin Tuna catches are reported by the officer to the Chief of Fishing Port for validation who is authorized to perform validation of CDS forms, including compilation of catches per previous month. The Head of the Fishing Port submits monthly reports to the Director General of Capture Fisheries Directorate of Fish Resources every month. The Officer Directorate of Fish Resources compiles the monthly production and submits monthly reports to the CCSBT Secretariat.

Key points

- Chief of Fishing Port submit monthly report to Directorate General of Capture Fisheries
- Fishing season for Indonesia from January 1 to December 31 each year (the catch report 1 January to 31 March must be validated every 30 June of the current year)
- Dit Fish Resources compile monthly report of SBT and submit to CCSBT secretariat

2.8.6 MPR 2c: Ensure accuracy of the “Attributable SBT Catch”, including (for fishing Members) a physical inspection regime of SBT caught by the Member’s fishing vessel, and (for farming Members) monitoring the accuracy of the stereo video monitoring and adjusting/ re-calibrating where necessary.

There are random portside inspection activities undertaken by port officers. Inspection includes examination of a fishing permit (SIPI) and checks to ascertain if the vessel is listed on the CCSBT Record of Authorized Vessels. The inspection examines if SBT catches are recorded on the appropriate CDS form, as well as recording the number of the label (tag) on each fish. Validation Officers send these reports to the head of the fishing port to be passed to the Directorate General of Capture Fisheries.

Officers carry out validation as well as acting as certifiers of CDS and also carry out the vessel inspections.

Summary –

Inspection activities are undertaken by validation officers. To ensure the accuracy of the data included in the CDS, the validation officers carry out inspection of vessels and cross examine the data in the CDS. Inspection is described as a periodic (as in regularized), random (since vessels are selected on a random basis and not 100% basis) and includes examination of the vessel fishing license (SIPI) and a check to confirm that the vessel is in the CCSBT Record of Authorized Vessels.

Examination of SBT onboard and/or unloaded is undertaken as a validation of the data contained on the form of CDS, as well as recording the number of label (tag) is used. The Head of Fishing Port reports the monitoring activity to the Directorate General of Capture Fisheries. The Ministry of Marine Affairs and Fisheries has implemented a regulation stating that export of SBT can only take place with the official Catch Documentation Scheme (CDS) meet such as completed including; Catch Tagging Form (CTF), Catch Monitoring Form (CMF) and Re-Export / Export After Landing of Domestic product Form (REEF).

Key points

- **Validation CDS data by Validation Officers**
- **Inspection of fishing license and checking Record of Authorized vessels**
- **SBT can only be exported with completed CDS and tag**

2.8.7 MPR 3: All fishing-related SBT mortality is reported annually to the Extended Scientific Committee, for incorporation into stock assessment analysis, and to the Commission.

Fishing-related SBT mortality is reported annually within the National Scientific Report and submitted every year to CCSBT Extended Scientific Committee before the scientific meeting. The National report is lead by P4KSI and involving Dit. General of Capture Fisheries, Dit. Pengawasan Sumberdaya Kelautan dan Perikanan, KP3K dan P2HP. The Head of Development Research Center of Conservation and Fish Resources has become leader of the National Scientific Report. These reports include: source of data from the observer/ enumerator at port sampling, Catch Documentation Scheme (CDS), Statistic National and Scientific publication.

The Scientific Report compiled by the Development Research Center of Conservation and Fish Resources (P4KSI) includes:

- Catch and effort of SBT
- Nominal CPUE
- Hook rate
- Size distribution
- Catch Documentation Scheme (CDS)
- Spatial distribution of CPUE

Summary

A report is sent annually to CCSBT Extended Scientific Committee which includes catch and effort of SBT, Nominal CPUE, hook rate, size distribution, catch documentation schemes (CDS) and spatial distribution of CPUE.

Key points

- The National report lead by head of P4KSI involving Dit. General of Capture Fisheries, Dit Pengawasan Sumberdaya Kelautan dan Perikanan, KP3K dan P2HP

2.8.8 MPR 4: Operating systems and processes applied to monitor compliance with annual catching arrangements, and impose sanctions or remedies where necessary.

MMAF report that 'Because of National Allocation for Indonesia is too low compared to the number of vessels registered an allocation system per vessel cannot be implemented'.

A notification letter is sent when the Association quota is approaching the National quota (refer to Appendix). As quota is not allocated by the government at the vessel level, it appears that there can be no sanction applied to individual fishing vessels that catch SBT in excess of the quota. Based on the information provided by the Member authorities, there are also no sanctions applied to Associations if their share of the quota is exceeded, beyond the reduction in quota the following year as described in

the Akmani Agreement, although there appears to be ambiguity on the enforceability of this arrangement.

By using the three systems auditing such as inspection of vessel, inspection of landings and inspection of markets.

- **Inspection of vessel**
Inspection of the vessel will include an assessment of fishing licenses and other requirements, including confirmation of the CCSBT Record of Authorized Vessels. This inspection will ensure adherence to the vessel the CMM.
- **Inspection of landings**
Inspection of landings or ground inspections focused on records number of SBT caught and landed. This inspection as much as possible need to validate the information contained in the documents CDS. Additionally, done recording the number of tags that have been installed properly and the tags are detached accidentally during fishing period
- **Inspection of markets**
Inspection of the market will be focused on local buyers, such as restaurants serving SBT to their customers. This inspection aims to verify the data received by the restaurant SBT includes a list of companies that supply the fishermen or SBT.
- In consideration of the social aspects of the sanctions are still in the process of consultation among stakeholders.

2.8.8.1 Recent infringements and sanctions

MMAF report that very little illegal fishing was reported. No specific cases were reported by MMAF during the audit. No other documentation was discovered that provided evidence of infringements and sanctions applying. It is known that no sanctions were applied to the Association vessels with overcatch of SBT in previous years.

2.8.8.2 At sea inspections

No evidence of the activities and outcomes of at sea inspections were available during Phase 1 and 2 of the audit.

2.8.8.3 Compliance risk assessment

No evidence of a formal risk assessment of compliance issues were identified, although the key 'issue' presented regarding risk of compliance was presented as insufficient SBT quota for the size of the fleet that may encounter SBT. (n.b. The SBT fishery is presented as a non-target (bycatch) fishery of other tuna fisheries (yellowfin and bigeye)).

Summary

There is a legal framework of regulations and some operational systems to monitor compliance with catching arrangements. There are legal instruments to allow sanctions to be imposed. There are gaps identified in monitoring of vessels (refer to key points).

MMAF note that National Allocation for Indonesia is too low compared to the number of vessels registered in the CCSBT Total Allowable Catch allocation is based on the ship cannot be implemented. Until now there has been no sanctions provided only to the extent that the notification letter had approached the catch quota. Ministry of Marine Affairs and Fisheries has implemented that for Southern Bluefin Tuna export can only be carried out through the Catch Documentation Scheme (CDS) with three fittings meet the Catch Tagging Form (CTF), Catch Monitoring Form (CMF) and Re-Export / Export After Landing of Domestic product Form (REEF). Three system auditing inspection of vessel, inspection of landings and inspection of market.

Random inspection un quantified na dinsoection market and how oinspection take place

Key points

- VMS is required on all vessels that could catch SBT
- A legal framework to implement CDS on all vessels is in place
- Level of compliance is monitored through CDS returns and random portside inspection but level of coverage per port and vessel segment (>30GT; <30GT) is not available
- MMAF note that Total Allowable Catch (TAC) based upon numbers of vessels registered can not be implemented
- There is no sanction applied for fishing vessels that catch more SBT than allowed
- There is little evidence of sanctions applied to any vessel catching SBT
- The system not provided to control each fishing vessels catch of SBT this is a potential in effectiveness the system.

2.9 Compliance with National Allocations 2 (CCSBT Obligation 1.1(iii))

The aim of this obligation is to ensure that Members have processes in place to effectively and accurately manage the carry-forward of quota from one year to the next, within the restrictions agreed by the CCSBT.

NOTE: MPR 1 applies only to Members which have decided to adopt the carry-forward procedure.

2.9.1 MPR 1a: [Operating systems and processes must be in place to ensure that] **An accurate, verified and robust figure for the final Attributable Catch is available before the notification to the Secretariat of the carry-forward, and a report on the adoption and use of the carry-forward procedure is included in each annual report to the Extended Commission.**

MMAF report that currently, there is no carry-forward for SBT in Indonesia.

Summary

A system is not in place to allow carry forward. There has been no carry-forward for SBT in Indonesia to date.

Key points

- **Total catch has exceeded allocation in the 2011 and 2012.**
- **The accuracy of overcatch may require further evaluation due to possible gaps in the CDS, the CDS verification system and other MCS.**

2.9.2 MPR 1b: **The Executive Secretary is formally notified of the catch for the concluded quota year together with the available catch limit (Catch Allocation + carry-forward) for the new quota year within 60 days of the start of the new quota year.**

There is no carry-forward for SBT in Indonesia

Summary

A system is not in place to allow carry forward. There is no carry-forward for SBT in Indonesia. The Directorate General of Capture Fisheries has reporting responsibilities to CCSBT

2.10 Record of Authorised Carrier Vessels 1 (CCSBT Obligation 2.3(i) + (ii))

The aim of this obligation is to ensure that Members have processes in place to effectively and accurately manage a record of authorised carrier vessels to receive transhipments-at-sea in areas beyond national jurisdiction.

NOTE: This obligation applies only to Members which have carrier vessels conducting transhipments in the high seas

2.10.1 MPR 1a: [Operating systems and processes to] Authorise specific carrier vessels to receive at-sea transhipments from its authorised Fishing Vessels (LSTLVs).

Indonesia has declared that there is no SBT transhipment falling under the definition that requires authorization and compliance with MPR's. Currently, there are no authorized carrier vessels of Indonesian flag on CCSBT data base. The last entry was for an authorized vessel in 2013 (Jaya Bali Beraudara- V) registered Oct 2012-Ded 2013).

Indonesia tuna fisheries operate limited transhipments of fresh tuna. This is confined to companies that have a partnership relationship with the receiving vessel which operate ice cooling of tuna which are then landed at Indonesian ports prior to any exporting occurring. Although catcher vessel must operate VMS, it is unclear whether transport vessels must also comply with VMS requirements. Observers are stated to be present on transport vessels.

Under the MPR Oct 2013; Section 3.5 Transhipment at Sea Monitoring Program (Resolution) it is stated that • Section 2 of this Resolution relates to the establishment and maintenance of a record of authorised carrier vessels that are authorised to receive SBT at sea from tuna longline fishing vessels with **freezing capacity** (LSTLVs). Its obligations are set out in section 2.3 of this Appendix so that it is together with the other CCSBT Authorisation measures.

Section 2 of the Resolution does not make reference to freezing capacity although Section 1 does make the following statement:

1. The Commission hereby establishes a program to monitor transhipment at sea which **applies initially to tuna longline fishing vessels with freezing capacity** (hereafter referred to as the "LSTLVs") and to carrier vessels authorised to receive transhipments from these vessels at sea. The Commission shall at its 2010 Annual Meeting, review and, as appropriate, revise this Resolution.

It would seem that transhipment of fresh tuna falls outside of this resolution with regard to monitoring obligations but it remains uncertain or at least may require clarification if transhipment of any product form (fresh or frozen) of SBT falls under the requirement of Authorization if not monitoring requirements.

Noted : Ministry of Marine Affairs and Fisheries Regulation no 26/2013 article 37.

Summary

Indonesia has not formally authorised specific carrier vessels to receive at-sea transhipments from LSTLV's and describe the carrier vessels as business partners of the catcher vessels who handle only fresh SBT on ice. The extent to which Indonesia only tranships within National jurisdiction is not fully understood, although it is implied by the statements provided.

Key points

- No data/records of transhipments taking place was available for high seas transhipments and similar for other transhipments within national jurisdiction.
- There is no specific location for transhipment designed by the Ministry
- Carrier vessels are not required to comply with the CDS (although catcher vessels are required to comply)
- Transhipment can only take place within the same organisation
- Transhipment supervised by Observer

2.10.2 MPR 1b: [Operating systems and processes to] Ensure authorised carrier vessels will meet their obligations to provide access and accommodation to observers, cooperate with observers in relation to carrying out their duties, and not interfere with, or seek to influence, observers in any way.

Indonesia has passed a regulation to support the observer program by requiring that carrier vessels facilitate onboard accommodation for observers.

Summary

There is a regulation that requires carrier vessels accommodate observers

Key points

- Information on the actual observer program operated was not available during the QAR.
- It is uncertain to what extent the regulation includes provisions for cooperation with observers in relation to carrying out their duties and not interfere with, or seek to influence observers in any way.
- Indonesia operates a scientific observer programme under RITF and is also developing increased observer coverage under DGCF. Observation is described as both consistent with CCSBT Scientific Observer Program Standards and developed for supporting compliance to regulatory requirements for Indonesia fisheries operating in the Indian Ocean.

Of note: Indonesia operates an observer program, conducted by RITF communicated as compliant with Scientific Observer Program conducted by RITF has complied with CCSBT Scientific observer program standard and described in the Annual Report to the Compliance Committee and the Extended Commission CCSBT 10 – 17 October 2013 (CCSBT-CC/1310/SBT Fisheries - Indonesia (Rev.1). Recently, DGCF communicated that it is developing a new observer programme, supported by issuance of Ministerial Regulation No 1 year 2013 on observer program. In DGCF noted that they will collaborate with RCFMC and link to the scientific observers in Benoa RITF to increase coverage of observed vessels.

2.10.3 MPR 1c: [Operating systems and processes to] Provide required information on authorised carrier vessels to the Executive Secretary within 1 month of the vessel being authorised, and before such vessels are actually used in transhipments.

Deemed not applicable by Indonesia SBT management system.

Summary – Indonesia does not classify the current carrier vessel activities under the CCSBT MPR. It is inferred that no high seas transhipment occurs, although not fully confirmed.

Key points

- Transhipment relates to fresh, iced SBT which is returned to domestic ports before sale/exporting. Carrier vessels are described as partners (referring to within the same organisation as catcher vessels) and as such, are classified as not falling under CCSBT authorised carrier vessel requirements.

2.10.4 MPR 1d: [Operating systems and processes to] submit any updates to the Executive Secretary promptly, and no later than 1 month from the change occurring, and before such vessels are used in transhipments.

Not applicable

Summary – Deemed not applicable by management system

Key points

- Refer to MPR 1c

2.10.5 MPR 1e: [Operating systems and processes to] Ensure all authorisations, and any updates, are submitted electronically to the Executive Secretary using the Data Provision Form for CCSBT Record of Authorised Carrier Vessels.

Deemed not applicable.

Summary – Refer to MPR 1d**Key points**

- **Refer to MPR 1c**

2.11 Record of Authorised Carrier Vessels 2 (CCSBT Obligation 2.3(iii))

The aim of this obligation is to ensure that Members have processes in place to ensure VMS on board all transshipment vessels.

NOTE: This obligation applies only to Members which have carrier vessels conducting transshipments in the high seas

2.11.1 MPR 1: Operating systems and processes to ensure that carrier vessels are only to be authorised to carry out at-sea transshipments if (a) the carrier vessel already has an operational VMS installed, or the carrier vessel undertakes to install an operational VMS before any authorisation and transshipments of SBT take place, and (b) the VMS transmits at frequency sufficient to show transshipment operations, and (c) the VMS will function effectively in the expected operating conditions.

MMAF note that this requirement is not applicable to current transshipments of SBT.

Transshipment at sea is carried out soon after it is caught to maintain the quality of the fish. (A maximum of 14 days is considered acceptable for Japanese fresh SBT market). Transfer activity requirements from the MMAF do not require location for transferring cargo. Catch Documentation Scheme (CDS) is only required on the fishing vessels and not for carrier vessel but the carrier vessel must be part of same company (under same management) as the catcher vessel.

Summary – Deemed not applicable by Indonesia authorities**Key points**

- **Process of transshipment is monitored by the fishing vessel captain**
- **the Ministry of Marine Affairs and Fisheries does not specify location for transferring cargo**
- **Catch Documentation Scheme (CDS) only implemented on fishing vessels not for carrier vessel**
- **Process transshipment only carried out for fishing vessel under one company**
- **QAR did not establish if transshipments occur only in National jurisdiction waters**

2.12 Catch Documentation System 1 (CCSBT Obligation 3.1 (i) – (v))

The aim of this obligation is to ensure that Members have processes in place to effectively and accurately manage the CCSBT Catch Documentation System (CDS).

2.12.1 MPR 1a: [Operating systems and processes established and implemented to ensure that] **All owners and operators of authorised farms, fishing vessels, and carrier vessels, and all SBT processors, importers exporters and re-exporters, are aware of their CCSBT obligations.**

The Director General of Capture Fisheries has established guidelines for the implementation of the catch documentation scheme (CDS) for southern bluefin tuna (SBT). Validators work to foster understanding among the sector to support compliance regarding documentation completion. The Director General of Capture Fisheries has implemented routine technical meetings to disseminate the implementation of the CDS to shipowners, importers and exporters.

The Management Information System (MIS) for CDS forms part of the mechanism to aid compliance awareness of SBT processors, importers, exporters and re-exporters.

Noted :

Directorate General Capture Fisheries Decree no 2/2013 concerning Validation for Catch Documentation Scheme.

Summary – There is a Decree concerning Validation for Catch Documentation Scheme and Guideline to support compliance

Key points

- **Validator and send a report to CCSBT secretariat**
- **Guidelines implementation of the CDS**
- **Dissemination of the CDS to shipowners, importers and exporters**
- **Management Information System (MIS) for CDS has been developed**

2.12.2 MPR 1b: [Operating systems and processes established and implemented to ensure that] **CDS documents accompany SBT as relevant, including (i) a Catch Monitoring Form (CMF) for all transhipments, landings of domestic product, exports, imports and re-exports; (ii) a Re-export/Export After Landing of Domestic Product (REEF) for all exports of SBT landed as domestic product then exported, and for all re-exports of imported SBT (any REEF must also be accompanied by a copy of the associated CMF and copies of any previously issued REEFs for the SBT being exported); and (iii) a Farm Transfer Form (FTF) for all transfers of SBT between authorised farms within the Member’s jurisdiction;**

Indonesia has implemented the CDS through specific national regulations. These include requirements for completion of Catch Monitoring Form (CMF) and Catch Tagging Form (CTF) for all SBT landed. There is evidence of implementation through the validation system and through portside inspections. Vessels

that carry SBT on behalf of catchers are not required to complete CDS documentation although the original CMF and CTF are required.

The majority of SBT is exported to Japan in fresh form. There are smaller quantities of SBT exported to USA, Malaysia, Korea and elsewhere. There is also an amount of domestic consumption. All exports of SBT are required to carry the correct CDS and tag and evidence of CDS reports were available. The level of compliance to which this is undertaken was not ascertained during the QAR and there may be some unquantified gaps in CDS originating from SBT landed in the small fleet sector.

The system can be seen on flowchart on section 3.6.2

Summary –

For all the export SBT must be accompanied by the document Catch Monitoring Form (CMF) that have been validated.

Key points

- **CDS implemented and evidence of compliance within the catching sector was observed**
- **CDS for transshipment is deemed not applicable**

2.12.3 MPR1c: [Operating systems and processes established and implemented to ensure that] All entities with CDS certification obligations have certification requirements, including that the certifier for the Catch Tagging Form (CTF) should be the Vessel Master or other appropriate authority for any wild harvested SBT, and the Farm Operator or other appropriate authority for any farmed SBT.

The CDS system has been established through regulations and dissemination is in progress to fully implement certification obligations at each port. Each SBT caught requires tagging and completion of catch tagging form (CTF). The forms must be signed by the head of fishing port or validation officer with the appropriate authority. Indonesia reports that the Management Information System works to reduce the incidence of tags being used more than once.

Summary –

Catch Documentation Scheme (CDS) and Catch Tagging Form (CTF) has been implemented for SBT caught. Management Information System has been developed to reduce tag use more than one.

Key points

- **Catch Documentation Scheme (CDS) in place at major ports**
- **Catch Tagging Form (CTF)**
- **Management Information System has been developed**

2.12.4 MPR 1d: [Operating systems and processes established and implemented to ensure that] **All entities involved in towing and farming SBT have procedures to (i) record the daily mortality of SBT during catching and towing, and the quantity (number and weight in kilograms) of SBT transferred to each farm; and (ii) use these records to complete the Farm Stocking Form at the end of each fishing season and before the SBT are recorded on a CMF.**

Indonesia is not a farming Member for SBT.

Summary – Indonesia is not a farming Member for SBT.

Key points

Not applicable

2.12.5 MPR 1e: [Operating systems and processes established and implemented to ensure that] **Compliance with certification procedures is verified.**

Verification includes the certification of the Catch Documentation Scheme (CDS) conducted by examining the data and cross checking that fishing vessels on the forms are registered with CCSBT and that vessels are not included in the list of IUU fishing vessels issued by RFMOs.

MMAF note that several mistakes can be found on Catch Monitoring Forms which are described as human error. Common mistakes are (i) tags used more than once, (ii) numerical errors, (iii) vessel names errors.

Officers also check that the fishing area listed in the CDS is allowed under the fishing license (SIPI) and logbook of the vessel. After officers conduct validation checks, they sign and stamp the forms to certify them. How the system operates when discrepancies are found with CDS is uncertain although the system does provide verification of CDS accuracy.

Summary – Authorized officers are in place to undertake verification of CDS of catcher vessels.

Key points

- **Checking fishing vessel registered in CCSBT not included in the list of IUU fishing vessel**
- **Verify the fishing licence and log book**
- **Verify information in CMF/CTF and cross check with random inspections**

2.12.6 MPR 2: Any use of specific exemptions to CDS documentation (allowed for under obligation 3.1 A (ii) for recreational catch) must be (a) explicitly allowed and this decision advised to the Executive Secretary; and (b) have associated documented risk-management strategies to ensure that associated mortalities are accounted for and that recreational catches do not enter the market.

Not applicable

MMAF state that there is no recreational fishing for SBT.

Summary – There is no recreational fishery for SBT in Indonesia

Key points

- **No evidence of recreational catches provided.**

2.12.7 MPR 3: Operating systems and processes established and implemented to ensure all CDS documents are uniquely numbered and completed fully and in accordance with the document's instructions.

Ordering tags is carried out once a year through the application of each member state to the CCSBT Secretariat. Tags are pre-printed and uniquely numbered.

The Directorate General of Fishing requests tags, CMF, and CTF from CCSBT Secretariat on behalf of the Associations (ATLI, ASTUIN (and ASPERTADU)). These are distributed to the Associations who in turn distribute tags to each of their members. It is unclear if ASPERTADU will receive an allocation although historically, they have not done so.

Generally Indonesian fishing vessel catches Southern Bluefin Tuna in the EEZ. All documents CDS code has been given a distinctive number. CDS issued in Bali given code B followed by a unique serial number while the CDS issued in Jakarta given code A followed by a serial number.

An example of the document CDS code:

- T-ID14-J-0001
- T =tagging form
- ID = Indonesia
- 14 = year of issue 2014
- J = Jakarta place of issued
- 0001 = serial number

Summary – CDS documentation are uniquely coded to facilitate traceability to place of landing, year and unique tag (sequential) numbering.

Key points

Distinctive number to distinguish of tag for each fishing port

2.13 Catch Documentation System 2 (CCSBT Obligation 3.1 (vi))

The aim of this obligation is to ensure that Members have processes in place to effectively and accurately manage the CCSBT Catch Documentation System (CDS).

2.13.1 MPR 1: Operating systems and processes established and implemented to ensure that at all times only carrier vessels authorised on the CCSBT Record of Carrier Vessels for the transhipment date are permitted to receive at-sea transhipments from the Member’s LSTLVs.

For the time being there are no Indonesian carrier vessels authorised to receive high seas transhipments from fishing vessels. All transhipments are deemed by Indonesian authorities as not falling under the CCSBT MPR. Transhipment consists of fresh SBT transfers from catcher to transporter vessel of the same organization.

Summary –

There is no Indonesia carrier vessel authorised to receive at sea transhipment from fishing vessel

Key points

- **Deemed not applicable**

2.13.2 MPR 2: Rules established and implemented to prohibit (a) the landing, transshipment, import, export or re-export of SBT caught or transhipped by non-authorized fishing/carrier vessels, and (b) the transfer of SBT to, between or harvested from farms which were not authorized to farm SBT on the date(s) of the transfers/ harvests.

There is a system for Quota allocation which includes distribution to Association vessels and accounting for landings according to the CDS. A list of authorized vessels is available and cross checking of the vessel to confirm vessel licensing and CCSBT authorization is carried out by Port Officers. The rules appear established and implemented for the >30GT component of the fleet and smaller vessels that fall under the membership of one or the other Associations receiving quota are likely included in CDS. Whilst all vessels are required to complete CDS, the <30GT (artisanal) fleet does not appear to directly receive quota allocation and it is uncertain to what extent catches of SBT by these vessels is included in the CDS and if these catches are allocated quota causing a downward adjustment in total quota availability from the allocated total for that period.

Of note, catches from the artisanal vessels can be sold to owners of vessels above 30 GT and/or to fish processing unit. This may result in their inclusion within the CDS if the purchasing company then fulfils the CDS reporting forms and accounts for the SBT against their own allocation. This would presumably result in CDS validation and accounted for within the purchasing company in order for export to commence. However, to what extent processors have access to CDS catching/tagging forms and these are completed for such purchases is not ascertained.

The overall allocation and CDS has been described and general evidence of its implementation has been provided. Section 4 (Member Process Flow Maps) provides a diagrammatic description of the system.

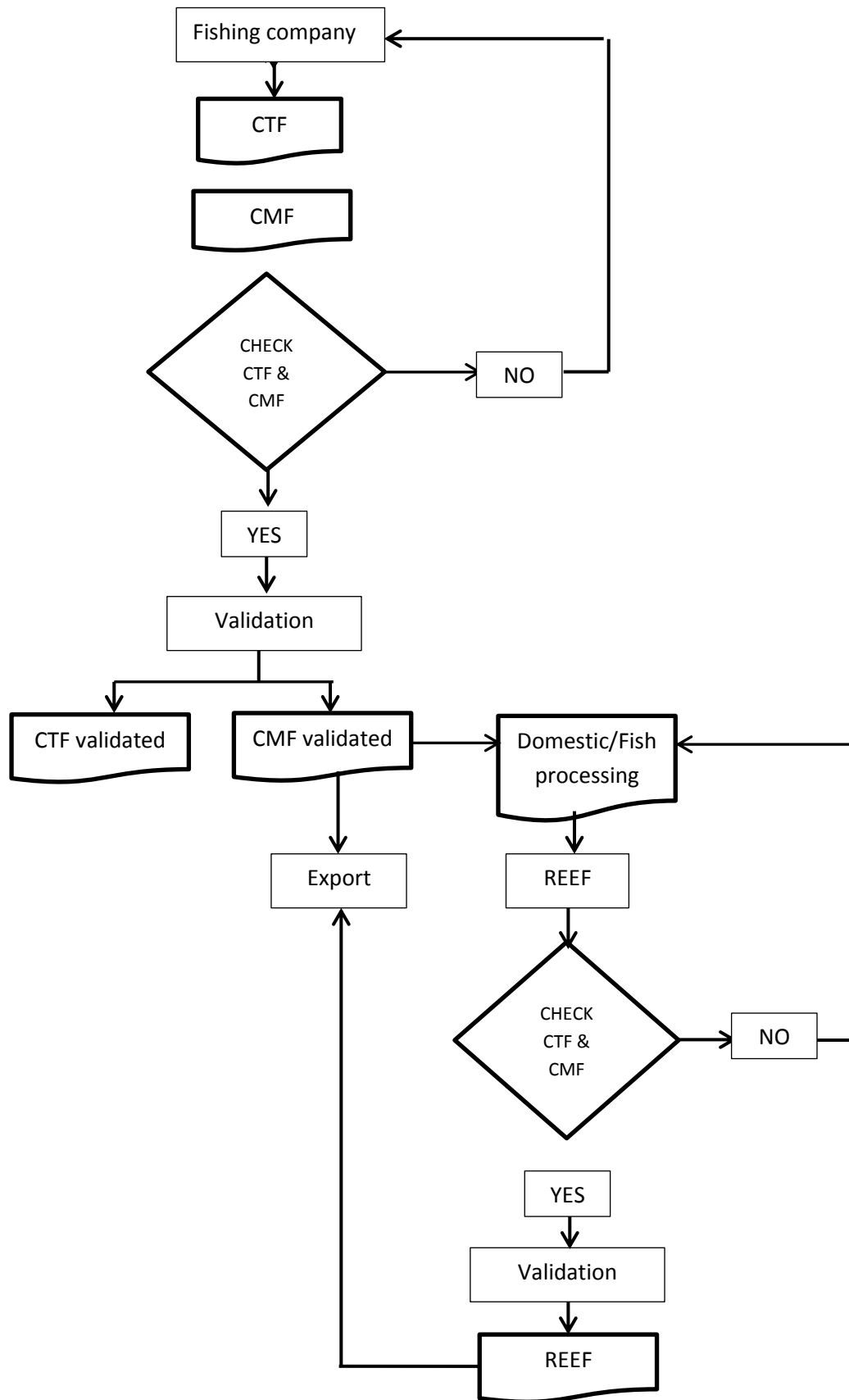
For each SBT, the captain is required to apply a tag and fill out the CTF and sign it as certification.

At landing the Captain is required to submit the CTF to the officer at the fishing port to obtain verification. Rules are established through Decree No. 20/KEP-DIPT/2014 on the appointment of officers for inspection and verification duties. There are two kind of verification namely direct physical verification of the SBT catch and verification of the forms for CCSBT administrative purposes.

Catch verification of SBT is carried out by the 'Enumerator Officer' from Directorate General of Capture Fisheries, Dit. Fisheries Resources Management through a crosscheck to confirm if the SBT is in accordance with the data in CTF. The validated forms are submitted to the fishing port to proceed with administrative verification. Once verification is completed, the fishing port officers perform data entry into the CDS system for on-line applications to Directorate General of Capture Fisheries. Then the form is validated by the CDS fishing port officers and cross referenced. The CDS form which is validated by officers appointed through decree of the Director General of Capture Fisheries. If the verification result is not suitable then the fishing port officer returns the CTF and requests clarification from the Vessel Captain.

After the CDS forms are validated and scanned, the fishing port officer submits the CTF, CMF and REEF to the Company as a requirement to export SBT.

Figure 6: Flow diagram of process to check accuracy of information by ensuring every CDS



Summary –

The CDS reporting mechanism in Indonesia include validation officer to reconcile the CTF and CMF, after CMF CTF and validate the reexport / export after landing domestic product and requirements for all vessels encountering SBT to use CDS.

Key points

- Regulations and Decrees implementing the CDS are newly established in 2013 and 2014
- A thorough description of the verification process for CDS at landing (CMF/CFF) and with CDS for RE-Export and Export after landing (REEF) was available.
- Regulations for vessels fishing in WPP-RI include license and authorization for SBT
- There is some ambiguity as to how the CDS system functions for catches of SBT by the smaller, artisanal fleet landing outside the main ports.

Catch Documentation System 3 (CCSBT Obligation 3.1 (vii) – (ix))

The aim of this obligation is to ensure that modifications to CDS documents are monitored and reviewed.

2.13.3 MPR 1: The Executive Secretary shall, in consultation with Members, determine whether proposed modifications are minimal or significant with respect to this obligation.

Indonesia has never issued CDS document changes.

Summary – Indonesia has never issued CDS document changes**Key points**

- No changes have been made to date.

2.13.4 MPR 2: Modified documents remain compatible with approved forms to ensure data series remain continuous and so they can be uploaded by the Secretariat.

No modifications made at this time.

Summary – Currently not applicable.

Key points

- Not applicable

2.13.5 MPR 3: Modified documents are provided to the Executive Secretary in electronic format at least 4 weeks prior to the use of such documents and with proposed modifications clearly highlighted.

Not applicable

Summary – Currently not applicable

Key points: Not applicable

2.14 Catch Documentation System 4 (CCSBT Obligation 3.1 (x) - (xii))

The aim of this obligation is to ensure that CCSBT catch tagging requirements are met.

2.14.1 MPR 1(a): [Operating systems and processes established and implemented to ensure that CCSBT Catch Tagging Program requirements are met, including] Ensuring all SBT tags meet the minimum specifications in paragraph s of appendix 2 of the CDS Resolution.

Regulation requires that all of the SBT caught shall be tagged. Installation of tags can be done immediately after death or at the time of SBT landed in fishing port. MMAF confirm that SBT tags have been confirmed to meet minimum specifications in paragraph s of appendix 2 of the CDS Resolution.

Summary – Confirmed as meeting requirements.

Key points:

- **A unique numbering system is applied to each tag**

2.14.2 MPR 1(b): [Operating systems and processes established and implemented to ensure that CCSBT Catch Tagging Program requirements are met, including] **recording the distribution of SBT tags to (i) entities authorised to fish for, or farm, SBT; and (ii) where applicable, entities which received tags to cover exceptional circumstances.**

Tags are distributed to the Associations (ATLI, ASTUIN and ASPERTADU) who administer to the fishing vessels via the member companies.

Summary – Distribution is not directly to authorized vessels but to Associations who administer tags. There is a monitoring system that confirms that vessels returning CDS forms are authorized. However, this does not include artisanal (<30GT vessels) that are not members of the Associations.

Key points

- **Distribution of tag to each association and not direct to authorized vessels.**
- **The association distributes to member company who distributes tags to their vessels**

2.14.3 MPR 1(c): [Operating systems and processes established and implemented to ensure that CCSBT Catch Tagging Program requirements are met, including] **requiring a valid tag to be attached to each SBT brought on board a fishing vessel and killed (including SBT caught as incidental bycatch) or landed and killed from a farm.**

Regulation has been implemented that requires all killed SBT to be tagged. The CDS is implemented and certification/verification is in place and has been reviewed through the QAR. There could be potential gaps in the tagging system associated with non-association member vessels and bycatch from non CCSBT registered vessels that under the system are not entitled to receive quota allocation. These appear to fall outside of the system, although to what degree this occurs is not understood.

Summary – There is an established information system and implementation of CDS including tagging of SBT catches. There may be gaps in the system, potentially for smaller classification vessels that are not members of the Associations tasked with administering the CDS. However, for all SBT that is tagged, there is evidence of monitoring and verification in place.

Key points

- **Legal requirements for CDS and tagging of all SBT**
- **Potential disparity of application of system for non-tuna association artisanal fishery**

2.14.4 MPR 1(d): [Operating systems and processes established and implemented to ensure that CCSBT Catch Tagging Program requirements are met, including] **requiring tags to be attached to each fish as soon as practicable after the time of kill.**

Installation of tags can be carried out immediately after death or at the time of SBT landed in fishing port.

Summary – Tagging does not always take place immediately post capture but can occur on arrival to port

Key points

- **Not always immediately post capture**

2.14.5 MPR 1(e): [Operating systems and processes established and implemented to ensure that CCSBT Catch Tagging Program requirements are met, including] **requiring details for each fish to be recorded as soon as practicable after the time of kill including month, area, method of capture, as well as weight and length measurements carried out before the SBT is frozen.**

Recording details include date, phase of moon, fishing ground, fishing methods, fish weight, fish length is determined before any fish are frozen and written in the Catch Tagging Form.

Summary – There is a system and evidence of its implementation including the details prescribed by MPR 1(e).

Key points

- **Catch Tagging Forms (CTF) reviewed.**

2.15 Catch Documentation System 5 (CCSBT Obligation 3.1 (xiii) - (xviii))

The aim of this obligation is to ensure that CCSBT catch tagging requirements are met.

2.15.1 MPR 1: Operating systems and processes established and implemented to (a) meet procedural and information standards set out in appendix 2 of the CDS resolution; (b) identify any unauthorised use of SBT tags; (c) identify any use of duplicate tag numbers; (d) identify any whole SBT landed, transhipped, exported, imported or re-exported without a tag; (e) ensure that tags are retained on whole SBT to at least the first point of sale for landings of domestic product; and (f) ensure a risk management strategy (including random or risk based sampling) is in place to minimise the opportunity of illegal SBT being marketed.

Indonesia has been developing a Management Information System for CDS which has been established in recent (2013-2014) regulations and Decrees and through the implementation of the verification system for CDS form reporting. Verification and review systems- through random vessel inspections and cross checks with Association and buyer inspections. The system can identify discrepancies which are generally resolved through direct clarifications with the fishing company's involved. There were no examples of non-compliance provided during the Phase 1 or II review and no evidence of sanctions being applied to any cases of non-compliance.

Hence, the system could potentially identify the occurrence of duplicate tags and SBT where tags may have become detached, although it is not currently outwardly based on a risk management strategy. The portside inspection system is random, although it is not clear how randomized or regularised inspection takes place.

Additionally, the recording of the number of tags that have been installed properly and the recording of tags that have detached accidentally during fishing period is undertaken. Inspection of the market is focused on local buyers, such as restaurants serving SBT. This inspection aims to verify the data received by the restaurant SBT includes a list of companies that supply the fishermen or SBT.

Summary –

Indonesia has been developing the Management Information System for CDS, using a triple systems auditing - inspection of vessel, inspection of landings and inspection of markets as part of the verification that CDS is implemented.

Key points

- **Management Information System (MIS)**
- **Inspection of vessel at two main Ports, inspection of landings and inspection of markets.**

2.15.2 MPR 2 Operating systems and processes established and implemented to (a) monitor compliance by operators with control measures in section 2.15.1, above; (b) impose sanctions on operators where non-compliance is detected; and (c) report any cases of whole SBT being landed without tags to the Executive Secretary, and minimise their occurrence in future.

The QAR review notes that if a violation is detected, the CDS is not validated. Absence of validation will negate the export options for the company. If human errors or mistakes or lost tags are noted during the validation process, there are corrective activities which can ensure documents are accurate. However, it is not ascertained to what extent any violations that may occur result in sanctions on the business.

Summary – Validation would not occur if a violation is evident.

Key points

- **The validation system operates to correct any errors in the documentation before validation of documents is issued to the company**
- **If violations occur, the CDS is not validated although the QAR did not ascertain further definition of sanctions that have or may apply.**

2.16 Catch Documentation System 6 (CCSBT Obligation 3.1 (xix) - (xxi))

The aim of this obligation is to ensure that CDS documents are effectively validated.

2.16.1 MPR 1a: [Operating systems and processes established and implemented to] Authorise validators to validate Farm Stocking, Catch Monitoring and Re-Export/Export after Landing of Domestic Product Forms;

Every year the Ministry of Marine Affairs and Fisheries authorises the validation officers at two fishing ports (with relief validators also registered) under the decree of the Director General of Capture Fisheries.

Summary – Authorized Validation Officers are present at fishing port

Key points

- **Validation officer at two fishing ports**

2.16.2 MPR 1b: [Operating systems and processes established and implemented to] **Demonstrate that all persons with authority to validate CDS documents are (i) government officials or other individuals who have been duly delegated authority to validate; (ii) are aware of their responsibilities, including inspection, monitoring and reporting requirements; and (iii) are aware of the penalties applicable should the authority be misused.**

The Decrees of Director General of Capture Fisheries itemizes the duties and functions of the Validation Officers and also forms the authorization of the officer to perform such duties.

Summary – The Decrees of the Director General of Capture Fisheries forms the authorization and formal consent of the appointed Officers to perform duties according to the responsibilities assigned.

Key points

- Decree from Director General of Capture Fisheries- Decree No. 20/KEP/2014

2.16.3 MPR 1c: [Operating systems and processes established and implemented to] **Appropriate individuals certify each CDS form type by each signing and dating the required fields;**

Head of fishing port and appropriate authority signed Catch Monitoring Form (CMF) based upon date of charging / certification. Catch Tagging Form (CTF) was signed by officers from the company with information of signing officer made available.

Summary –

Catch Monitoring Form (CMF) signed by head of fishing port and Catch Tagging Form (CTF) appropriate authority from the company.

Key points

- Catch Tagging Form (CTF) and Catch Monitoring Form (CMF)

2.16.4 MPR 1d: [Operating systems and processes established and implemented to] **The same individual does not both certify and validate information on the same CDS form**

Certification is carried out by the company, normally the Captain of the fishing vessel and the validation is issued by the government, carried out by the Validation Officer.

Summary –

Certification is carried out by the fishing company and the validation is issued by the government

Key points

- Certification is separate from validation.

2.16.5 MPR 1e: [Operating systems and processes established and implemented to] Inform the Executive Secretary of (i) the details for all validators and keep this information up to date; and (ii) of any individuals removed from the list of validators no later than the end of the quarter in which the removal occurred;

Any changes to the validation officials used by Indonesia are immediately communicated to the secretariat CCSBT. This includes the officer's name, example of the signature and the official stamp.

Summary – Executive Secretary will be informed immediately of changes to the approved Validation Officer list

Key points

- Name, sample signature and authorization stamp are provided as specimen examples

2.16.6 MPR 1f: [Operating systems and processes established and implemented to] Ensure that no individual conducts validations (i) prior to the Executive Secretary being fully informed of his/her current validation details, or (ii) after that individual's authority to validate has been removed.

Catch Documentation Scheme validation is only performed by personnel who have been assigned validation by decree of the Director General of Capture Fisheries, have been submitted to the executive secretary, and listed on the CCSBT website (name, sample signature and official stamp).

Summary –

CDS validation has been assigned by Decree of the Director General of Capture Fisheries

Key points

- Decree no. 20/KEP-DJPT/2014

2.16.7 MPR 2 Operating systems and processes established and implemented to monitor performance (compliance and effectiveness) of validators.

A technical guidance manual on the CDS implementation has been developed as reference material for validation officers. The Management Information System has been established as a formal process for organisation and securing of the documents that are generated from CDS. Validation Officer are required to make monthly reports, quarterly and annual reports to the Director General of fisheries through Head Harbour. There are routine meetings held every three months to monitor progress and identify issues that require addressing.

Summary – A Technical Manual is in place to support Validation Officers implement the CDS. The MIS supports the organization and secure control of forms/documents generated by the CDS.

Key points

- Manual book of CDS
- Validation officer MAKES monthly, quarterly and annual reports
- Regular meeting for evaluation (circa 4 per year)

2.17 Catch Documentation System 7 (CCSBT Obligation 3.1 (xxii) - (xxv))

The aim of this obligation is to ensure that CDS documents are effectively validated.

2.17.1 MPR 1a: [Operating systems and processes established to ensure] CDS forms are only validated (i) where all the SBT listed on the form are tagged (except in cases where tags are no longer required due to processing having occurred); (ii) in the case of farmed SBT, for SBT harvested from farms on a date that the farm was authorised on the CCSBT record of Authorised Farms; and (iii) in the case of Wild Harvest SBT, for SBT taken by FVs on a date when that FV was authorised by the flag Member.

MMAF state that Validation Officers only validate forms where:

- i. corresponding tags are available for SBT listed on the form
- ii. not applicable and
- iii. the vessel was authorized by the flag Member (although Indonesia reports that no flagged Members are landing in Indonesia.

Summary

Procedures are established to implement the system consistent with the MPR

Key points

- **Uncertainty may arise from non authorized vessels that bycatch and land SBT**

2.17.2 MPR 1b: [Operating systems and processes established to ensure] validated documentation accompanies all SBT consignments whether transhipped, landed as domestic product, exported, imported or re-exported, and (MPR 1c) no SBT is accepted without validation documentation.

The regulations require that all of the SBT caught must be accompanied by CDS document. The system requires that all SBT is documented according to SBT. There may be risks for SBT that are transhipped internally where tags are not applied until landing and where for bycatch SBT from artisanal fleet that is not managed by Associations.

Summary –

All of the SBT caught must be accompanied by CDS document

Key points

- **Catch Documentation Scheme (CDS)**
- **Artisanal fleet that are not members of Associations may present a risk to loss in CDS**
- **Internal transhipments may cause a risk to gap in CDS coverage**

2.17.3 MPR 1d: [Operating systems and processes established to ensure] Validation does not occur where (i) validator authorisation procedures were not correctly followed or (ii) any deficiency or discrepancy is found with the CDS form.

Officers will not validate CDS documents when any mistakes are found which result in non- accordance with the CDS form. The recent development of Management Information System (MIS) for CDS will facilitate the checking if there is deficiency or discrepancy is found in the form of CDS. If there are any mistakes in the form of CDS then the form can not be printed out and validation is not sent to the company until clarification and/or correction of forms occurs.

Summary – Validation does not occur if mistakes or discrepancies are found.**Key points**

- **Officers validation for CDS document**
- **Management system information for CDS**
- **Port Officers carry out clarifications and undertake random checks to confirm compliance**

2.17.4 MPR 2a: [Operating systems and processes established and implemented for a Member to validate SBT product against CDS documents, including] requirements to check accuracy of information by ensuring every CDS document is complete, valid and contains no obviously incorrect information by cross-checking data on the form being validated against (1) data on preceding CDS forms including the Catch Tagging Form; (2) relevant lists of authorised farms, vessels or carriers; and (3) result of any physical inspection by the authority.

Diagram process to check accuracy information by ensuring every CDS document is complete as below:

Validation officers check CMF and CTF after data on Catch Monitoring Form completed then the validation officers signed and stamped the CMF. If found any discrepancies the validation officers will return the CMF to the company for clarification. If Catch Monitoring Form (CMF) and Catch Tagging

Form (CTF) were validated then export can be carried out by the company. For domestic/fish processing REEF document will be issued after checking catch monitoring form (CMF) and catch tagging form (CTF) by the validation officers. If found any discrepancies the validation officers will return the CMF to the fish processing company for clarification. If REEF document were validated then export can be carried out by the fish processing company.

Summary –**Diagram process to check accuracy information of CDS (refer to figure 6)****Key points**

- **Established diagram process of CDS**

2.17.5 MPR 2b: [Operating systems and processes established and implemented for a Member to validate SBT product against CDS documents, including] **notification of any inconsistencies or inaccuracies to the Member’s enforcement authorities.**

If there is inconsistency in charging CDS then Directorate General of Capture Fisheries and Directorate General of Surveillance decide administrative sanctions. There is uncertainty as to what extent these are administered.

Summary –**Inconsistency in charging CDS then Directorate General of Capture Fisheries and Directorate General of Surveillance decide administrative sanctions****Key points**

- **Administrative sanctions**
- **Very little non-compliance noted during the QAR**

2.18 Catch Documentation System 8 (CCSBT Obligation 3.1 (xxvi))

The aim of this obligation is to ensure that CDS documents are retained and submitted as required.

2.18.1 MPR 1: Documents and/or scanned electronic copies stored in a secure location for a minimum of three years under conditions that avoid damage to the legibility of the documents or the data files.

Catch Documentation Scheme in the form electronic copies stored in a separate storage of other files as well as safe from damage during a minimum of three years.

Summary –

CDS in the form electronic copies stored in a separate storage. Hard copies also stored at the office of MMAF.

Key points

- **CDS form electronic copies stored in a safe place for a minimum of 3 years**

2.19 Catch Documentation System 9 (CCSBT Obligation 3.1 (xxvii) + (xxviii))

The aim of this obligation is to ensure that CDS documents are retained and submitted as required.

2.19.1 MPR1: Copies of all completed CDS documents issued by catching Members or received by importing or receiving Members, sent to Executive Secretary in accordance with timeframes specified in the CCSBT documentation.

Indonesia (Directorate General of Capture Fisheries) as CCSBT Member submit CDS electronic copy to the secretariat of CCSBT each month (monthly basis).

Summary –

CDS electronic copy were send to secretariat CCSBT monthly basis

Key points

- **CDS electronic copy were sent to secretariat CCSBT monthly basis. No incidences of late responses were provided.**

2.19.2 MPR2: Catch Tagging Form information shall be provided to the Executive Secretary using the electronic Data Provision Form developed by the Secretariat and in accordance with the Data Provision Form's instructions.

Indonesian sends information of Catch Tagging Form (CTF) to the executive secretariat CCSBT every month by using the form in accordance with the provision of data electronic data form's instructions

Summary –

Information of CTF sent to the executive secretariat CCSBT (monthly basis)

2.20 Catch Documentation System 10 (CCSBT Obligation 3.1 (xxix) + (xxxi))

The aim of this obligation is to ensure the verification of CDS documents.

2.20.1 MPR 1: Operating systems and processes established and implemented to (a) assign unambiguous responsibility to individuals or institutions for implementing verification procedures; and (b) ensure no verification procedure is carried out for a CDS document by an individual who has validated or certified the same CDS document.

Unambiguous responsibility is assigned to the validation officers at the Directorate of Fisheries. Port Officers also take part in the overall verification system through random checks on vessels at port and log book checks (Verification officers from the Directorate of Fisheries Resources Management). These are separate individuals. This system applies to the major official landing ports and is applicable to Association members that are mostly the >30GT vessels.

For artisanal vessels (10<30GT) that land in other smaller ports, the provincial department is responsible for implementing the at port verification of SBT landings. Regulation of the artisanal fisheries is managed by the provincial local regulations by issuing fishing licenses (SIPI). For fishing vessels that are not listed under CCSBT but which may catch SBT as a bycatch, the fish must still be fitted with a tag in accordance with paragraph 4.1.3 resolution on the implementation of CCSBT Catch Documentation Scheme and as modified by 17 October 2013. For fishing vessels ≤ 30 GT, the provincial government issues permits and also require that vessel captains fill in logbook records (PERMEN 18 th 2010). For these smaller volumes, records are made by the sub-district Fisheries Extension Officers by way of monthly reports to District Fisheries Offices. The District Fisheries Offices compile quarterly reports which are then reported to the Directorate General of Capture Fisheries for compiling in the annual Indonesian fishery report. The quantities remain unverified during the QAR, but notes as being a small percentage of total landings.

However, the system for smaller artisanal vessels that are not under an Association appears more ambiguous or less defined. It is not understood if artisanal vessel captains certify CDS forms and if Provincial fishery/ sub-fishery Officers conduct validation or verification duties and pass any CDS forms to the official validation officers.

Arguably, it may lead to delays or gaps in catch quota accounting by the Directorate General of Capture Fisheries who may receive this landing data on a quarterly basis. It is understood, though, that meetings between the Directorate of Fisheries and both the Associations and Artisanal Fishery Associations do take place to support understanding on how to maintain compliance with the CDS and reporting system for SBT. There is also 6-monthly dissemination or review of the CDS operational effectiveness, a form of separate verification that is undertaken by the Directorate.

Summary – The system is implemented for the main >30GT fleet and demonstrated to be unambiguous. For the smaller (10-30GT) fleet the system is not prescribed to the same degree.

Key points:

- **Certification, validation and verification duties are separated when applied to the main CDS application – major landing ports**
- **There is need for further clarification on how the system applies to SBT landed by vessels outside of the 2 main Associations and in smaller ports**
- **Dissemination of CDS every 6 months within Government, Association and artisanal fleet**

2.20.2 MPR 2a: [Operating systems and processes established and implemented for verification, including] **Selecting and inspecting, where appropriate, a targeted sample of vessels and export, import and market establishments based on risk. The intent of these inspections should be to provide confidence that the provisions of the CDS are being complied with.**

There is three step verification process used - inspection of vessel, inspection of landings and inspection of markets to ensure that the audit complies with the requirements of the CDS procedures. The verification system was not described as a formal risk based review process. The system is randomized although how the selection process works was not described. There is also a 3 monthly review of the CDS to determine effectiveness and review any issues that arose such as SBT with missing tags.

Summary –

There is a randomized 3 step verification process and a periodic review process (3 monthly)

Key points

- **Random inspections are carried out**
- **The verification system was not described as risk based during the QAR activities**

2.20.3 MPR 2b: [Operating systems and processes established and implemented for verification, including] **Reviewing and analysing information from CDS documents at least once every 6 months, including (i) checking the completeness of data on CDS forms and cross-checking the consistency of the data on CDS forms received with other sources of information; (ii) cross-checking data from the Executive Secretary’s CDS six-monthly report; and (iii) analysing any discrepancies.**

Review and analysis of information from any documents CDS are carried out minimum once every 3 months and combined with information obtained from the secretariat of CCSBT.

Summary –

There is a review of documents CDS minimum every three months

Key points

- **Cross checking using the random selection system at Port and local market**
- **Irregularities are reviewed**

2.20.4 MPR 2c: [Operating systems and processes established and implemented for verification, including] **investigating any irregularities suspected or detected and (MPR 2d) taking action to resolve any irregularities.**

The MMAF note that if there is suspicion of a violation then a clarification is requested from the fishing company

Summary –

Clarification to the fishing company

Key points

- **Clarification to the fishing company**

2.20.5 MPR 2e: [Operating systems and processes established and implemented for verification, including] **notifying the Executive Secretary and relevant Members/OSECs, of any consignments of SBT whose CDS documentation is considered doubtful or incomplete or invalidated.**

Summary – Verification is conducted on each CDS form registration. Discrepancies are dealt with through clarification to company. The results are sent to CCSBT Executive Secretary

Key points

- No information on notification procedures for doubtful/incomplete or un-validated consignments.
- The system works to encourage reporting and refusal to provide validation may act as a deterrent to non-compliance or result in undocumented consignments on less compliant markets

2.20.6 MPR 2f: [Operating systems and processes established and implemented for verification, including] **notifying the Executive Secretary of any investigation into serious irregularities, in order to present these in an annual summary report to the Compliance Committee. Notifications should include reporting (i) the commencement of an investigation if doing so will not impede that investigation; (ii) progress, within 6 months of starting the investigation if doing so will not impede that investigation; and (iii) the final outcome within 3 months of completing the investigation.**

Any investigation into the accuracy of the CDS will be reported to the secretariat of CCSBT.

Summary –

Any investigation into the accuracy of the CDS will be reported to the secretariat of CCSBT.

Key points

- No evidence of investigations was available as examples during the QAR

2.20.7 MPR 3: Ensure that no SBT is accepted (for landing of domestic product, export, import or re-export) without validated documentation attached.

Indonesia notes that it does not accept imports of SBT without validated CDS documentation.

Summary –

Indonesia only accept import of SBT with CDS document that have been validated.

Key points

- CDS document that have been validated

2.21 Transshipment (at sea) Monitoring Program 1 (CCSBT Obligation 3.3 (i) – (v))

The aim of this obligation is to ensure that Members have processes in place to effectively and accurately manage the carry-forward of quota from one year to the next, within the restrictions agreed by the CCSBT.

2.21.1 MPR1a: [Operating systems and processes to ensure] The authorisation document, including details of the intended transshipment provided by the master or owner of the LSTLV, is available on the LSTLV prior to the transshipment occurring.

Indonesian authorities state that Indonesian vessels do not conduct transshipments as described by the CCSBT definition of transshipment.

Summary –

No at sea transshipment for SBT considered falling under the category as prescribed by CCSBT Transshipment definition according to MMAF

Key points

- **Indonesia does not tranship frozen SBT from LSTLV at sea according**

2.21.2 MPR1b: [Operating systems and processes to ensure] Any carrier vessel receiving the transhipped SBT is meeting its obligations to provide access and accommodation to observers, and to cooperate with the observer in relation to the performance of his or her duties (see Carrier Vessel Authorisation minimum performance requirements, CCSBT documentation).

Indonesian authorities state that Indonesian vessels do not conduct transshipments as described by the CCSBT definition of transshipment.

Summary – No at sea transhipment for SBT considered falling under the category as prescribed by CCSBT Transhipment definition.

Key points

- Indonesia has implemented Scientific Observer Programme for ERS managed by RITF
- Indonesia reports that DGCF is developing a National Observer Program that will link with the observer program of RITF at Benoa
- Uncertain to what extent, if any, if inter-company transfer of fresh tuna is observed

2.21.3 MPR2a-d: [Rules in place to ensure] (a) all SBT transhipments receive prior authorisation; (b) fishing vessels are authorised on the CCSBT authorised fishing vessel register on the date(s) the SBT are harvested and carrier vessels are authorised on the CCSBT authorised carrier vessel register on the date(s) any transhipments occur; (c) a named CCSBT observer is on board the carrier vessel; and (d) no SBT transhipment occurs without an observer onboard.

Indonesian authorities state that Indonesian vessels do not conduct transhipments as described by the CCSBT definition of transhipment. Transhipments are transfers of fresh tuna to inter-company carrier that ices and returns SBT to Port. It is unclear to what extent this activity is included in observation specifically or if it is observed only when the catcher vessel has already and observer on board for that particular fishing trip.

Summary – No at sea transhipment for SBT considered falling under the category as prescribed by CCSBT Transhipment definition.

Key points

- No transhipment therefore no direct observation targeted at such activities

2.21.4 MPR2e: [Rules in place to ensure] Transhipment declarations are completed, signed and transmitted by the fishing vessel and the carrier vessel, in accordance with paragraphs 11-14 of the Transhipment Resolution, in particular that the LSTLV shall transmit its CCSBT Registration Number and a completed CCSBT Transhipment Declaration to its flag State / Fishing Entity, within 15 days of the transhipment.

Indonesian authorities state that Indonesian vessels do not conduct transhipments as described by the CCSBT definition of transhipment.

Summary – No at sea transhipment for SBT considered falling under the category as prescribed by CCSBT Transhipment definition.

2.21.5 MPR3a,b: [Operating systems and processes to] Issue transhipment authorisations and verify the date and location of transhipments.

Indonesian authorities state that Indonesian vessels do not conduct transhipments as described by the CCSBT definition of transhipment.

Summary – No at sea transhipment for SBT considered falling under the category as prescribed by CCSBT Transhipment definition.

Key points

- **Authorisations are not issued due to non applicability**
- **Specific location of inter-company transhipment of fresh SBT not required**

2.21.6 MPR3c-f: [Operating systems and processes to] Request placement of observers on board carrier vessels; notify any cases of ‘force majeure’ (where transhipment occurs without an observer on the carrier vessel) to the Executive secretary as soon as possible; ensure observers can board the fishing vessel before transhipment takes place, and have access to personnel and areas necessary to monitor compliance; enable observers to report any concerns about inaccurate documentation or obstruction, intimidation, or influence in relation to carrying out their duties.

Indonesian authorities state that Indonesian vessels do not conduct transhipments as described by the CCSBT definition of transhipment. However, Indonesia reports that a regulation has been passed to support observers on board vessels requiring them to facilitate onboard accommodation for observers.

Summary – No at sea transhipment for SBT considered falling under the category as prescribed by CCSBT Transhipment definition.

Key points

- **Observation of transhipments do not take place due to non-applicability**
- **For other Indonesian fishery observation, a regulation to support the observer program by requiring that carrier vessels facilitate onboard accommodation for observers.**

2.21.7 MPR3g,h: [Operating systems and processes to] monitor compliance with the control measures; and impose sanctions or corrective action programmes for any non-compliance detected.

Control measures are performed through the CDS, using the three audit verification system to identify potential compliance issues and thereby impose corrective actions. There are administrative sanctions based upon Ministry Regulations no. 12 year 2012, no. 26 year 2013, and no. 10 year 2013.

Summary – There are administrative sanctions based on Ministry Regulation no 12 year 2012; no. 26 year 2013 and no. 10 year 2013.

Key points

- **Control measure through CDS**
- **Administrative sanctions**

2.22 Transhipment (at sea) Monitoring Program 2 (CCSBT Obligation 3.3 (vi))

The aim of this obligation is to ensure that Members have processes in place to effectively and accurately manage the carry-forward of quota from one year to the next, within the restrictions agreed by the CCSBT.

2.22.1 MPR1: Operating systems and processes are in place to (a) identify and resolve any discrepancies between the fishing vessel's reported catches, CDS documents and the amount of fish counted as transhipped; and (b) 100% supervision of all fish transhipped.

Indonesian authorities state that Indonesian vessels do not conduct transhipments as described by the CCSBT definition of transhipment. There is inter-company transfer of fresh SBT catches from vessels to transporters. These activities are considered by Indonesia to not fall under CCSBT requirements.

Summary – Deemed not applicable to the inter-company transhipment of fresh tuna

2.22.2 MPR2: Operating systems and processes are in place to allow any CDS forms for domestically landed SBT that were transhipped at sea to be validated at the time of landing.

Indonesian authorities state that Indonesian vessels do not conduct transhipments as described by the CCSBT definition of transhipment. CDS for SBT landed via inter-company transfers of fresh SBT to a carrier vessel by Association vessels are within the current framework of the SBT administration system and therefore are most likely to be documented under CDS, including CMF and CTF. Tags may be applied at point of capture or at landing and hence, carrier vessels would need access to tags and CTF for any untagged fish transferred. Carrier vessels for fresh tuna are within the management structure of the fishing company and members of one of the two associations and have access to CDS forms.

Summary – Deemed not applicable to the inter-company transhipment of fresh tuna

Key points

- **Tags are applied either at catching or at landing**
- **CDS system available to carriers that are within company structure of members companies of one or other of the two Associations receiving 50% allocations**

2.23 Transhipment (at sea) Monitoring Program 3 (CCSBT Obligation 3.3 (vii))

The aim of this obligation is to ensure that Members have processes in place to effectively and accurately manage the carry-forward of quota from one year to the next, within the restrictions agreed by the CCSBT.

2.23.1 MPR1: Rules, systems and procedure to ensure all transhipped product is accompanied by signed Transhipment Declaration until the first point of sale.

Indonesian authorities state that Indonesian vessels do not conduct transhipments as described by the CCSBT definition of transhipment.

Summary – Deemed not applicable to the inter-company transhipment of fresh tuna

2.24 Annual Reporting to the Compliance Committee (CCSBT Obligation 6.5)

The aim of this obligation is to ensure that Members have processes in place to ensure information and reports are submitted to the CCSBT in a timely fashion.

2.24.1 MPR1: Submit information and report electronically to Executive Secretary at least 4 weeks before the annual Compliance Committee meeting.

Indonesia has submitted annual reports to the CCSBT secretariat in accordance with the time frame.

Summary – Indonesia submits annual reports to the CCSBT secretariat in accordance with the time frame.

Key points

- **Submitted annual reports to the CCSBT secretariat (last report CCSBT-CC/1310/SBT Fisheries - Indonesia (Rev.1) Oct 2013)**

2.24.2 MPR 2: The report for the previous calendar year must (a) include the quantities of SBT transhipped; (b) list the LSTLVs on the CCSBT Authorised Vessel List that transhipped; (c) analyse the observers reports received including assessing the content and conclusions of the reports of observers assigned to carrier vessels.

Indonesian authorities state that Indonesian vessels do not conduct transhipments as described by the CCSBT definition of transhipment.

Summary – Deemed not applicable to the inter-company transhipment of fresh tuna

3 Phase 2 Member site visit

The objective of the Member site visit was to verify to what extent the systems and processes described in documentation and records provided in Phase 1 and Phase 1 extension are fully implemented and consistent with the procedure described by the Member. The site visit also determines the effectiveness of the processes and activities in ensuring that Members meet their obligations specific to the MPR's covered by the scope of the QAR.

As the Indonesia QAR was undertaken in a seamless manner, with no major time gap between Phase 1 and Phase 2, the audit process did not result in a final completed Phase 1 report prior to undertaking Phase 2.

Instead, a draft report of Phase 1 desk top review and remote consultation was completed which was used to inform the audit team of the areas that required most clarification and verification during Phase 2. Consequently, the Phase 1 section of this report (section 2) contains the total audit outcome of both Phase 1 and Phase 2 activities.

Due to time constraints placed on the assessment process in identifying suitable dates to conduct the Phase 2 site visit, this did not occur until June 11th, which was behind schedule in order to fulfil the time obligations to provide the report to the Indonesia officials for their internal review. However, an interim draft was provided prior to this and a list of areas for clarification and information items which were identified during Phase 1. The Phase 2 site visit was undertaken as a one day consultation meeting at the Offices of the Ministry of Maritime Affairs and Fisheries. In both cases, meetings were attended by the relevant agency and support agency staff (refer to meeting plan below).

Table 7: Summary of Site visit Meetings

| Date | Organisation | Representatives | Items discussed |
|--|---|---|---|
| 22 April 2014 PHASE 1 CONSULTATION | <ul style="list-style-type: none"> Direktur Sumberdaya Ikan | <ul style="list-style-type: none"> Dr Toni Ruchimat | <ul style="list-style-type: none"> Management of Southern Bluefin Tuna (SBT) in Indonesia |
| | <ul style="list-style-type: none"> Kasub Dit Sumberdaya Ikan ZEEI dan Laut Lepas | <ul style="list-style-type: none"> Saut Tampubolon S.Sos, M.M | <ul style="list-style-type: none"> Introduction of CCSBT Quality Assurance Review National allocation of Southern Bluefin Tuna Implementation of Catch Documentation Scheme in Indonesia |
| | <ul style="list-style-type: none"> Ka sub Dit Data Statistik, | <ul style="list-style-type: none"> R.A Hesti Warih A.Pi,M.M | <ul style="list-style-type: none"> Statistical data for Southern Bluefin Tuna in Indonesia |
| | <ul style="list-style-type: none"> Balai Penelitian Pemulihan dan Konservasi Sumberdaya Ikan | <ul style="list-style-type: none"> Dr Fayakun | <ul style="list-style-type: none"> Research on Southern Bluefin Tuna in Indonesia |
| | <ul style="list-style-type: none"> Seksi Identifikasi Sumberdaya Ikan ZEEI dan Laut Lepas | <ul style="list-style-type: none"> Ir Sofi Chullatus Sofia Novia Tri Rahmawati S.Pi, M.Si | <ul style="list-style-type: none"> Implementation of Catch Monitoring Form Catch Tagging Form Re-Export/Export after landing of Domestic Product Form |
| | <ul style="list-style-type: none"> Seksi Tata Kelola SDI ZEEI dan Laut Lepas | <ul style="list-style-type: none"> Yayan Hemuryadin S.Pi,M.S.E Putuh Suadela S.Pi | <ul style="list-style-type: none"> Validation of Catch Documentation Scheme Ministry regulation for Observer and Logbook |
| | <ul style="list-style-type: none"> Kasub Dit Data Statistik Perikanan Tangkap | <ul style="list-style-type: none"> Ir. Sri Dyah Retnowati SP | <ul style="list-style-type: none"> Collecting statistical data for SBT for Capture Fisheries sub-sector in Indonesia |
| 11 Juni 2014 PHASE 2 SITE VISIT | <ul style="list-style-type: none"> Kasub Dit Sumberdaya Ikan ZEEI dan Laut Lepas | <ul style="list-style-type: none"> Saut Tampubolon S.Sos, M.M | <ul style="list-style-type: none"> Introductions and Short Presentation of the Quality Assurance Review TRIAL Quality Assurance Review Objectives |

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| | | | <ul style="list-style-type: none"> • Scope of Review • Trial QAR: Objectives of meeting |
| | <ul style="list-style-type: none"> • Seksi Identifikasi Sumberdaya Ikan ZEEI dan Laut Lepas | <ul style="list-style-type: none"> • Ir Sofi Chullatus Sofia • Novia Tri Rahmawati S.Pi, M.Si | <ul style="list-style-type: none"> • Additional information on Catch Monitoring Form, Catch Tagging Form and implementation of Catch Documentation Scheme for Southern Bluefin Tuna |
| | <ul style="list-style-type: none"> • Seksi Tata Kelola SDI ZEEI dan Laut Lepas | <ul style="list-style-type: none"> • Yayan Hemuryadin S.Pi,M.S.E • Putuh Suadela S.Pi | <ul style="list-style-type: none"> • Additional information on catch production of Southern Bluefin Tuna in Indonesia |
| | <ul style="list-style-type: none"> • Sub Direktorat Sistem Pemantauan | <ul style="list-style-type: none"> • | <ul style="list-style-type: none"> • Fishing vessel monitoring system in transshipment process |

3.1 Phase 1 and 2 information

Table 8: Phase 1 and 2 identified information

| Obligation | MPR | Phase 1 | Phase 2 | |
|------------|----------|--|--|--|
| | | Identified system/operations | Documentation/Information | Phase 2 documentation/process sighted |
| 1.1 (i) | 1 | <ul style="list-style-type: none"> Quota allocation of Southern Bluefin Tuna in Indonesia via the Akmani Agreement Indonesia has transformed the obligations of the Convention into national law | <ul style="list-style-type: none"> Quota agreement of Southern Bluefin Tuna Regulations and Decrees available | <ul style="list-style-type: none"> Process for ATLI (50%) dan ASTUIN (50%) SBT distribution |
| | 2a (i) | <ul style="list-style-type: none"> Fishing vessel registration | <ul style="list-style-type: none"> SIPI,SIUP,SIKPI permits/regulations | <ul style="list-style-type: none"> Directorate General of Capture Fisheries |
| | 2a (ii) | <ul style="list-style-type: none"> Catch Documentation Scheme (CDS) | <ul style="list-style-type: none"> CDS Regulation Catch Tagging Form Catch Monitoring Form REEF | <ul style="list-style-type: none"> Validation and stamp Fishing Port Validation officers CDS recording system CDS filing system |
| | 2a (iii) | <ul style="list-style-type: none"> Catch Documentation Scheme | <ul style="list-style-type: none"> Management Information System CDS Report conducted on a monthly basis and performed manually | <ul style="list-style-type: none"> Dissemination of Management Information System |
| | 2b | <ul style="list-style-type: none"> Reporting System based on the provisions specified from CCSBT | <ul style="list-style-type: none"> Catch report of SBT divided into : from 1 April-30 June, 1 July – 30 September and 1 October – 31 December | <ul style="list-style-type: none"> Existing catch data and still continue to be updated due to changes Catch of Southern Bluefin Tuna (Jan-March 2014) |
| | 2c (i) | <ul style="list-style-type: none"> Actual inspection | <ul style="list-style-type: none"> Inspection of fishing log book | <ul style="list-style-type: none"> Fishing Log book At port vessel inspection history/month (Benoa) |

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| | | | <ul style="list-style-type: none"> • Inspection carried out at random and periodic | |
| | 2c(ii) | <ul style="list-style-type: none"> • Installation of a tag performed on the vessel or port | <ul style="list-style-type: none"> • Technical implementation of CDS | <ul style="list-style-type: none"> • Technical manual book of CDS for SBT (hard copy) • Example copies of CDS |
| | 3 | <ul style="list-style-type: none"> • Management of tuna in general | <ul style="list-style-type: none"> • Ministry regulation in general | <ul style="list-style-type: none"> • Management of tuna in Indonesia-organisational arrangements described- MMAF, RITF, Provincial Government) |
| | 4 | <ul style="list-style-type: none"> • The sanction is imposed administratively | <ul style="list-style-type: none"> • Reminders letter to the association | <ul style="list-style-type: none"> • Reminders of the quota given to the association of the Directorate General of Capture Fisheries |
| 1.1 (iii) | 1a | <ul style="list-style-type: none"> • Observer programme implementation | <ul style="list-style-type: none"> • Observer Programme Documentation | <ul style="list-style-type: none"> • RITF Observer programme data/cover • General information of developing observer programme under MMAF |
| | 1b | <ul style="list-style-type: none"> • Vessel Monitoring System | <ul style="list-style-type: none"> • Ministry of Marine Affairs and Fisheries Regulation No 1 concerning vessel Monitoring System | <ul style="list-style-type: none"> • Specifics of VMS system • License requirements • Operational requirements of VMS |

3.2 Phase 2 Site Visit Outcomes

| | Summary | Key notes from Phase 2 | Weaknesses/Risks | Recommendations |
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| <p>Rules in place to ensure Attributable Catch does not exceed Member Allocated Catch for relevant period</p> | <p>A series of recent regulations and Decrees are in place, some recently amended and established for the implementation of the SBT allocation and implementation of the CDS.</p> <p>More recent documents of CDS forms, vessel registration with CCSBT demonstrates a growing level of active implementation of the SBT management system by the management agencies.</p> | <ul style="list-style-type: none"> Regulations are established only very recently (2012, 2013) and although this is not in itself a weakness, corresponds to the ‘developmental’ nature of the administration system for SBT in Indonesia and adoption of a system that is compliant with CCSBT MPR’s. There a number of potential weaknesses identified associated with the ‘developmental’ nature of the system. Notification of 70% catch and 100% catch of allocations per Association is provided by MMAF which is a constructive method of giving pre and formal notice that SBT allocation is approaching and is fully utilized. However, to what extent this actively prevents | <p>The risk of over-catch has already materialised in reported landings exceeding Allocated Catch by 191t (season ending 2011) and 210 t (season ending 2012) and further evidence of substantial over-catch in 2013. This was noted as traceable to the >30GT fishing vessels who are authorised SBT vessels under CCSBT rules.</p> <ul style="list-style-type: none"> It is uncertain if undocumented catches of SBT occur from non-authorised <30GT vessels. The current system is not conducive to maintaining or adapting capacity or effort matched with SBT allocation. The current system may not support the fishery in reducing catches of SBT when the full allocation is utilized, either through | <ul style="list-style-type: none"> SBT catches appear to be described as all by-catch from all fisheries, both the larger size authorized LSTLV and smaller size, coastal or artisanal vessels (10-<30GT). A review to determine if there is reason to redefine for vessels that might be more directly targeting SBT may be desirable. Such vessels may be appropriately managed by direct allocation of quota and held accountable for its use and reporting through CDA. Compliance and any sanctions for violations can be directly managed on a vessel basis. Allocation may be applied relative to catch statistics in other tuna fisheries and history of SBT encounter ability. Logbook and observer records may prove helpful in exploring |

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| | | <p>further catches and landings of SBT is not fully understood. The level of over-catch would suggest that it is not effective.</p> | <p>ceasing fishing or modifying fishing practice, or other mechanisms to reduce SBT encounters.</p> | <p>options for allocation.</p> |
| <p>Specification of allocation by company, quota holder or vessels</p> | <p>MMAF through the Directorate General of Capture Fisheries have implemented a system of indirect allocation of the SBT TAC using the two main tuna fishing Associations as the administration system to apply quota allocations directly to fishing member companies. The system extends to distribution of CDS forms and tags to vessels via the Associations.</p> | <ul style="list-style-type: none"> • There may be strengths in this method in allowing Associations to optimize SBT allocation to vessels that will encounter SBT more/less frequently and this may also help optimise economics within the fishery. • There may be weaknesses in the system, in that the administration and control from MMAF is indirect and hence it may be more challenging to maintain 'real time' accountability of weekly and monthly catches of SBT and the risk of non-compliance of CDS implementation may be greater. • Additionally, <30GT vessels are not always members of one of either Associations and hence are 'outside' of the allocation and CDS system. • It appears that | <ul style="list-style-type: none"> • MMAF may have challenges or administrative burden in obtaining full CDS documentation in real time from associations. • There is evidence of workshops and guidelines provided by MMAF to associations on use of CDS and this is acknowledged by the QAR as a proactive method to support compliance and efficiency within the system. • Undocumented catches of SBT from non-member vessels may remain a risk, although the total catch from this sector (<30GT) was described as far less than the larger long-line vessels. • <30GT vessels may sell SBT directly to registered member companies who then may apply the CDS which will result in accountability of these | <p>A review of the allocation system, particularly if vessels are better defined as actively targeting SBT (hence may warrant direct quota allocation from MMAF may be a consideration).</p> <ul style="list-style-type: none"> • Further verification of the current system through MMAF independent auditing of Association administration systems to identify any weaknesses or gaps. • Consideration of MMAF withholding an appropriate percentage of the SBT allocation for incidental by catches of SBT within the <30GT/coastal vessel segment and applying the CDS directly. If this allocation is not used, it could potentially be re-distributed via the Associations or directly by MMAF. |

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| | | <p>increasingly more of these vessels are registered and hence this may support CDS administration.</p> <ul style="list-style-type: none"> • Clarification of the current level of documentation of catches of SBT as bycatch by these <30GT vessels within the CDS was not fully confirmed by the QAR. | <p>catches.</p> <ul style="list-style-type: none"> • Whether or not there are other undocumented routes to market for these catches is uncertain from this review. | |
| <p>Arrangement for daily recording, weekly reporting of LSTLV's and monthly reporting of coastal vessels</p> <p>Operating systems and processes applied to monitor compliance with annual catching arrangements and impose sanctions or remedies</p> | <p>There is evidence of daily recording of catches in logbooks (a legal requirement) and these include the prescribed detail of information required. There is evidence of weekly reporting for LSTLV's via the Associations and monthly reporting of coastal vessels (also required to fill out logbooks) and cross checked through Portside CDS validation work. Coastal vessels are licensed and fall under jurisdiction via Provincial Government</p> | <ul style="list-style-type: none"> • The evidence presented during the QAR provided substantiation of an operational and implemented system. This was most evident for the major landing ports for SBT. • The 10-30GT coastal or artisanal vessels that land in more remote, regional locations are managed through the provincial government, which may be a more appropriate mechanism for active management as a devolved option. • The reporting system for these vessels from provincial to central administrations may be less effective and result in delays | <ul style="list-style-type: none"> • The potential for undocumented (untagged) SBT from regional ports where validation is not in place and verification systems may not be as active may result in increased risk to unaccounted SBT landings. In support of the current system, there was no evidence available of contradicting data that supports tangible mis-reporting nor evidence of violations of untagged SBT. The verification system did report to identify occasions of lost tags. The QAR did not establish the application of certain aspects of the verification system – such as how the randomized at port | <ul style="list-style-type: none"> • QAR did not engage in the provincial government and, recommendations are not made with respect to the reporting systems for coastal vessels. However, the QAR outcome does recommend that the data collection, validation and verification systems for remote landings of SBT is reviewed with respect to risks to timely and accurate reporting compliance. |

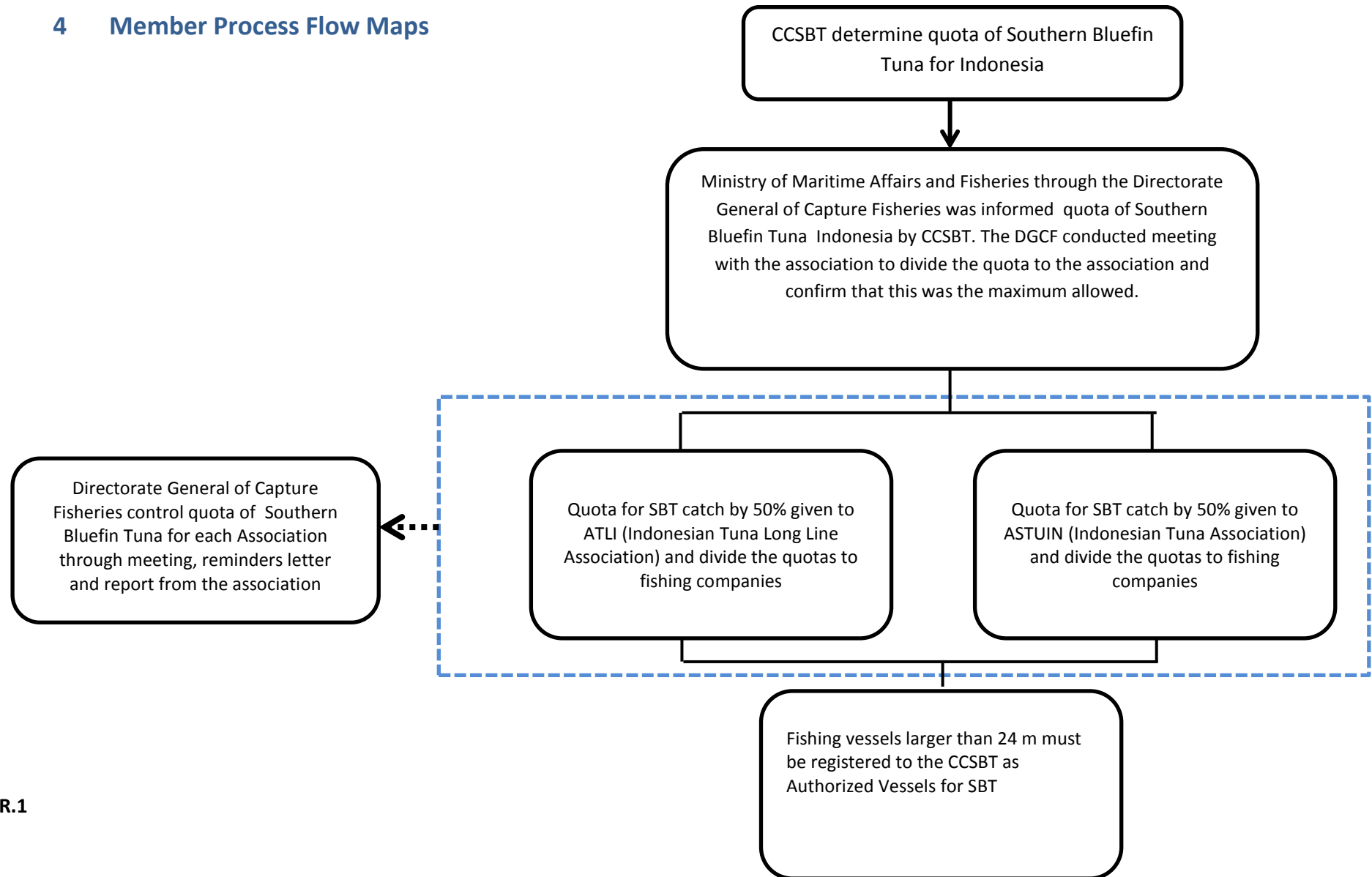
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| | | <p>cause delays or reduced accuracy in reporting according to CCSBT requirements. In support of the administration system, evidence reviewed on CCSBT reporting and submissions appear to be timely although may be placed under increased administrative burden.</p> | <p>inspection of landings may use risk analysis to focus application and resources.</p> | |
| <p>Ensure accuracy of the Attributable SBT Catch</p> | <p>CDS is administered via the Associations. MMAF has implemented field guides, engages in regular meetings and carries out some review of the Association documents. This happens periodically throughout the season. Validation Officers do receive all CMF/CTF and REEF as applicable and at port inspection of vessel (VMS, logbooks, licenses), verification of the CDS landing documents and inspection at local market which can identify cases of lost tags, inaccuracies in documents due to human error and make corrective actions.</p> | <ul style="list-style-type: none"> • There are 3 Validation officers, supported by 4 back up validation officers, located at 3 main ports. Additionally, there are Port Officials who carry out inspection at the main ports (log books). Monthly boat sampling activity is available from RITF with circa 50% cover described, focused on Bali-Benoa. At sea observer data is also available but more focused upon ERS than CDS. It is uncertain to what extent inspection of vessels and landings at other ports takes place under the Provincial government system. • CDS is administered by the Associations and MMAF | <ul style="list-style-type: none"> • At port inspection systems and other verification systems, focus on the major landing ports for SBT. To what extent, the system is comprehensive at smaller ports was not ascertained during the review. Fleet structure is reported by MMAF in annual compliance reports and Benoa port Bali continues to be the most significant. Landing data at Bali- Benoa and Jararta are available and Bali remains the most significant with an estimated 841 t landed in 2012 after yield factor adjustment (1.15), although landings by every port (E.G. Cilacap, Central Java and | <ul style="list-style-type: none"> • Reporting of all SBT landings (even though the value may be zero) by all Ports where SBT has been landed previously. • Review of the CDS Tag distribution system to ensure the risks of loss in tag traceability or risks of accidental re-use does not occur. • Review of the data collection systems at Ports to confirm consistency and further implementation of the verification systems to ensure adequate cover of these locations. |

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| | | and is uncertain to what extent MMAF maintains independent records of the tag distribution. | Pelabuhanratu (West Java) were not identified during the QAR. | |
| Record of Authorised Carrier Vessels | Indonesia declares that it does not practice transshipment as described under CCSBT requirements. Transshipments are of an inter-company basis (described as only allowed through company partnership). However, Indonesia has prescribed regulations for applying transshipment documentation for high seas, migratory species under RFMO requirements. To what extent this applies to other migratory species was not reviewed during the QAR. Under RFMO requirements such transshipments would require observation and hence, the risk to undocumented transfer of SBT should be considered minimal. | Since transshipments are of fresh,(most likely always whole) SBT on ice, this practice is considered not applicable for CCSBT MPR.. There may be a cause for review of the CDS application for transfer of SBT in this manner to confirm that tagged SBT are always transferred and CDS forms are appropriately documented to allow traceability of landed SBT to catcher vessel where carrier vessels carry SBT from more than one vessel on one occasion. | <ul style="list-style-type: none"> • SBT Quota allocation is not formally applied per vessel or company. Traceability of transferred SBT may be lost where CDS and tags are applied at landing (as the allocation is not per vessel or company). Associations may appropriately assign SBT to the catcher vessel and review systems from MMAF and guidelines and regular meetings between associations and MMAF are in place. Evidence of these reviews were not presented. | <ul style="list-style-type: none"> • There may be merit in a review of the current transfer practices for fresh tuna during inter-company carrier vessel transport to port to assess risks to loss in traceability and CDS application. • Rules such as application of tags on the catcher vessel and generation of CTF may support the reduction in any perceived risk arising out of transfer activity with lost or re-use of tags. |
| Fishing vessels and SBT processors, importers, exporters and re-exporters are aware of their CCSBT | There is evidence of active implementation of the CDS among fishers and guidelines/meeting to | Verification systems are separate from validation (separate personnel). However, it is not clear if the | There are guides and regular meetings were described with associations, artisanal vessel owners and | As described previously and in the Recommendations section of this report. |

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| <p>obligations; Certification, Validation and Verification systems designed to monitor their performance are in place and effective</p> | <p>support understanding and compliance. There are three types of verification of the CDS at port inspection, for CDS validation verification and at the local market.</p> | <p>verification extends to importers, exporters and re-exporters (if relevant). Local, domestic sales are included in verification. There is three step verification process used - inspection of vessel, inspection of landings and inspection of markets to ensure that the audit complies with the requirements of the CDS procedures. The verification system was not described as a formal risk based review process. The system is randomized but it is uncertain as to exactly what inspection rate per port is achieved. At port sampling is reported for Benoa (RITF) and this is >50% (2013 Compliance report). There were discussions on how these systems could be further integrated. There is also a 3 monthly review of the CDS to determine effectiveness and review any issues that arose such as SBT with missing tags. VMS is also in place for all</p> | <p>processors. However, insufficient information is available on the operation and effectiveness of verification systems. Validation and reporting at provincial ports is poorly established.</p> | |
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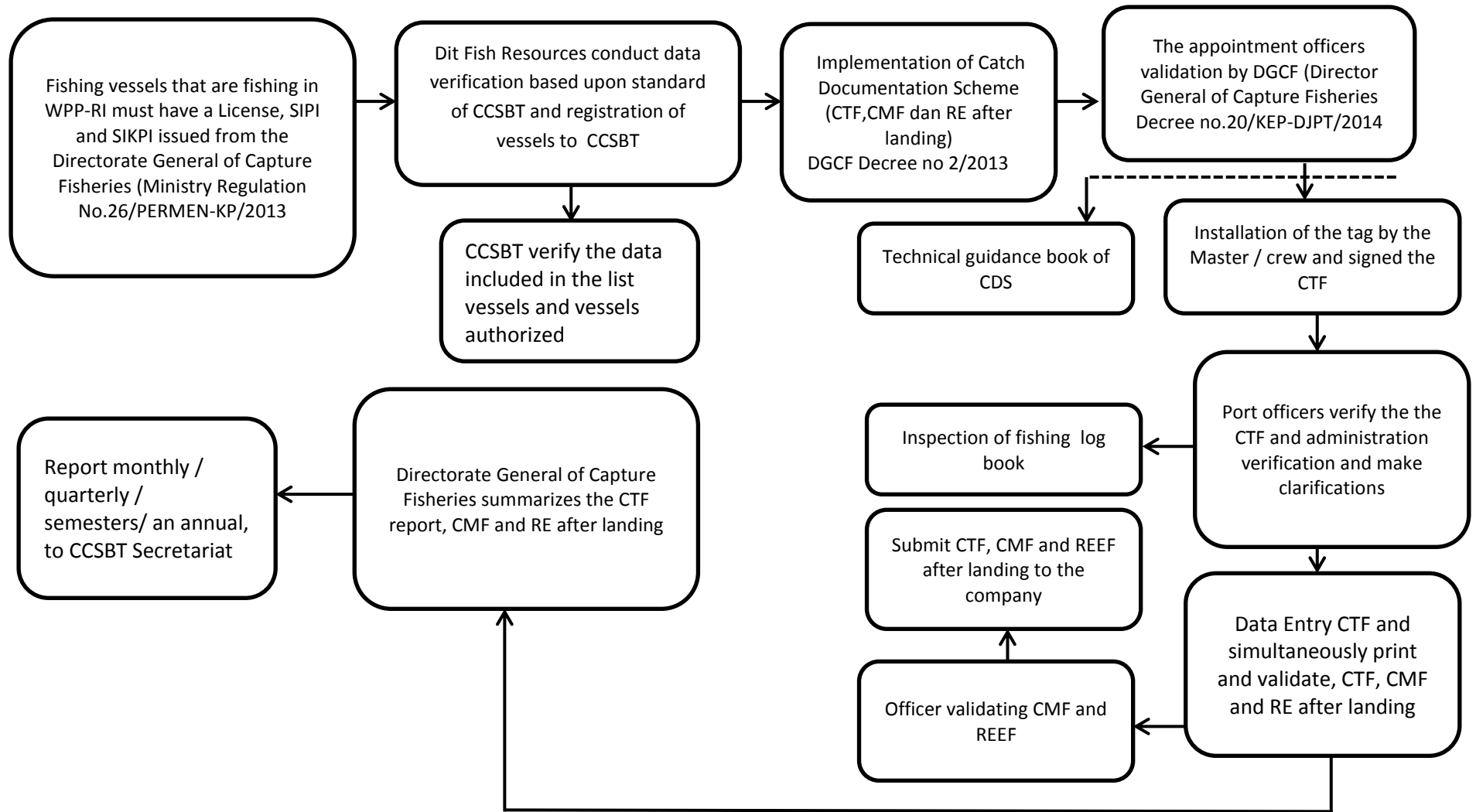
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| | | vessels >10GT and this includes all registered SBT vessels and would cover others that may not be registered but who encounter SBT. | | |
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4 Member Process Flow Maps



MPR.1

MPR .2



5 Management System Effectiveness

The Indonesia Southern Bluefin Tuna fishery management system can be described as evolving but requiring considerable development to conform to the Minimum Performance Requirements (MPR's) of CCSBT.

There is a management framework and administrative system for the implementation of rules, controls, monitoring and data collection for SBT catches. The institutional framework (through the various agencies of the Ministry of Marine Affairs and Fisheries is in existence and there are some regulations and decrees for SBT. However, there are considerable gaps in the system with respect to SBT management in accordance with CCSBT MPR's.

There are newly established regulations that support implementation of the SBT system, that appear consistent with CCSBT MPR's. Hence, the outcome of the review can identify some general compliance across MPR 1,2 and 3 and a general framework for MPR 4.

To the most part, there are systems that describe what is required but substantial gaps and some significant weaknesses exist in the current allocation system.

Tables 9 shows the strengths, weaknesses and threats (risks) identified by this process, whilst the recommendations (opportunities) of the SWOT are displayed in Section 6 and in table 10.

Summary of key items:

- **National Allocation of Southern Bluefin Tuna.**

The Ministry of Marine Affairs for Fisheries is informed by CCSBT or the annual SBT Allocation and through the Directorate General of Capture Fisheries each of the two main Tuna Fishing Associations is provided with 50% of the allocation. No other association at this time was provided with an allocation (e.g. ASPERTADU does not receive an allocation) and all 100% of the allocation is distributed at the beginning of the season. Allocation is described in the Akmani Agreement between the Agencies and Associations which describes the obligations on Associations for administering and completing CDS. However, there appears to be no legal basis to the Agreement for application of the rules and sanctions.

- **Registration of fishing vessel with CCSBT and CDS requirements.**

Each fishing vessels above 30 GT that catches SBT is required to submit CDS documents to the secretariat of CCSBT. Regulations requiring fisheries business license set forth in the (Regulation of the Minister of Marine Affairs and Fisheries No. PER.30 / MEN / 2012 on the fisheries business in Regional Fisheries Management of the Republic of Indonesia). Fishing vessels that have been verified by Directorate General of Capture Fisheries will be registered to the CCSBT Secretariat. The total SBT catches by the <30GT artisanal fleet were not provided although the majority of landings were described to come from the LSTLV's landing at the two main ports.

- **Implementation of Catch Documentation Scheme for Southern Bluefin Tuna.**

Directorate General of Capture Fisheries has implemented the Catch Documentation Scheme of SBT associated with the "Resolution on the Implementation of a Catch Documentation Scheme to record all of Southern Bluefin Tuna catch" effective since January 1, 2010. For all activities export or import of SBT tags have to be installed and the appropriate CDS documents available and validated. The system for validation and verification for this was described. As noted though, the CDS administration relies heavily on the associations for administration although not all are vessels that encounter SBT are members and non-members do not have access to quota.

All vessels that land SBT are required to complete CDS forms including the physical tagging fish although there appears to be gaps in CDS administration, implementation and accounting; most noticeably in the artisanal fleet which are not under one of the two associations that receive SBT quota. There is a time lag of SBT caught from these vessels reported via the provincial system which would appear to be 3 or 4 months.

Regarding the fleet which are members of the associations, the allocation system is administered on behalf of MMAF through a formal agreement (Akmani). There was no evidence of non-compliance or compliance presented, although there has been significant over catches of SBT in 2011, 2012 and 2013. However, the legal basis of Akmani appears ambiguous regarding the application of sanctions either to individual companies or the association directly and it is uncertain if Akmani specifically requires that members catch only up to their 50% allocation.

- **Installation tag carried out in vessels.**

Associations undertake ordering and distribution of tags to each fishing company and it appears that these are not recorded by the Directorate General of Capture Fisheries. It is uncertain how or if there is complete knowledge and accountability of tags. Tagging can be carried out on the vessel when the fish are caught or it can be done when arriving in the port. A system for application of tags to SBT landed by the artisanal fleet was not described.

To proactively support compliance and prevent double tag application of Catch Documentation Scheme, the Directorate of Fisheries Resources has produced a technical manual for implementation of the Catch Documentation Scheme in the form of a field guidance booklet. Meetings were described between the Directorate and associations (also with artisanal fleet) to support understanding.

Entry data Catch Tagging Form print out, validation of CTF, CMF after landing.

There was evidence of catch data entry and validated tagging forms which are manually recorded. Directorate General of Capture Fisheries has appointed officers for validation of Catch Documentation Scheme (Decree No. 20 / KEP-DJPT/ 2014). Three validation officers and 4 alternative officers were confirmed in 2013. Validation officer appear to operate for the official ports only. The effectiveness of transfer of CDS forms and their validation from vessels landing at other ports was not ascertained during the review. A system of

transferring catch statistics from provincial ports to the Directorate of Capture Fisheries was described. As noted, it appears to lag (3-4 months) behind reporting requirements of MPR's (one month from capture).

A Monitoring Information System (MIS) for CDS has also been recently developed and was communicated to be successful at identifying manual errors and incidences of lost and possibly cases of duplicate tagging. If or how these are investigated and whether sanctions are applied was not ascertained. There does not appear to be routine audits or risk assessments undertaken on the overall system or based on a selection of data reviewed from each annual fishery.

- **Verification Catch Tagging Form (CTF) and administration.**

The MIS was described as a significant development to support information collating and access and does appear to provide a basis to support further development of implementation systems. Verification systems were described as including at port random inspections by Port Officers, although to what extent was not presented. There was no evidence of the programme for or results of random inspections. Verification of CDS was described in some detail, based on a combination of random portside inspections of vessels, market inspections of SBT (only domestic) and CDS form inspections. Monthly audits were also described but details of how these take place were not available.

- **Report to the secretariat of CCSBT.**

Directorate General of Capture Fisheries summarizes the CTF report, CMF and RE after landing every 3 months. As noted, monthly verification was described although exactly how this is undertaken and how errors are resolved was not presented to the reviewers.

Table 9: Strengths, weaknesses, opportunities and threats (SWOT) analysis conducted for Indonesia's management systems determining compliancy to CCSBT Minimum Performance requirements (MPR's).

STRENGTHS

a) Strengths associated with MEMBER's SBT fishery and associated management in relation to CCSBT's MPRs

| Obligation | MPR | Strengths |
|------------|-------------|---|
| 1.1 (i) | 1 | <ul style="list-style-type: none"> Regulations have been established requiring CDS to be used. The allocation system is supported with a formal Agreement with Associations that administer quota and CDS, printed Guidelines and periodic meetings with the two tuna fishing associations are held to support understanding and support implementation of the CDS. |
| | 2a (i) | <ul style="list-style-type: none"> Allocation is straight-forward. 50% to each association which may allow for good optimization of quota among the two associations who may have good knowledge of vessel catch composition, fishing practice, location and likely encounter ability of SBT and need for quota. |
| | 2a (ii) | <ul style="list-style-type: none"> A logbook of fishing activity with daily entry, and for LSLTV specific too and meeting CCSBT specifications is in place through Minister of Marine Affairs and Fisheries Regulation no: 18 of 2010 on the fishing log book |
| | 2a (iii) | <ul style="list-style-type: none"> CDS has been implemented by the Ministry of Marine Affairs and Fisheries with the association for fishing vessel > 30GT. Indonesia has transformed CCSBT obligations for vessel registration into National Regulations |
| | 2b | <ul style="list-style-type: none"> Indonesia has established a Management Information and reporting System for the Catch Documentation Scheme |
| | 2c (i) | <ul style="list-style-type: none"> Some physical inspections are carried out at the main ports, including vessel inspections, inspection of the catch, market inspection and checking of labels (tags) for fishing vessel > 30GT. Farming not applicable to Indonesia |
| | 2c(ii) | <ul style="list-style-type: none"> Dissemination of technical manual on implementation of the scheme documentation Southern Bluefin Tuna catches |
| | 3 | <ul style="list-style-type: none"> SBT caught in Indonesia are in WPP-RI 573 which is the No. 1 CCSBT statistical area of catch. The Management Information System has been developed to support timely and accurate reporting of SBT mortality to the Extended Scientific Committee. Departmental staff have been assigned responsibility to coordinate and submit reports. |
| | 4 | <ul style="list-style-type: none"> The Associations are notified at 70% and 100% of quota use. |
| 1.1 (iii) | 1a | <ul style="list-style-type: none"> Trained validators and administrative staff are in place for CDS validation, cross checking, recording and compilation of reports at the main ports as verification. Currently Indonesia has not used the carry forward procedure. |
| | 1b | <ul style="list-style-type: none"> Responsibility has been assigned for reporting catch and catch limits for following quota year by Directorate General of Capture Fisheries |
| 2.3 | (i)1a | <ul style="list-style-type: none"> Indonesia declares that the requirement is not applicable |
| | 1b, c, d, e | <ul style="list-style-type: none"> Indonesia declares that the requirement is not applicable However, there is a regulation that requires carrier vessels to accommodate observers. |

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| 2.3 (iii) | 1 | <ul style="list-style-type: none"> Whilst MPR deemed not applicable, transshipment of fresh tuna is only allowed by same company as the catcher vessel. |
| 3.1 (i-v) | 1a | <ul style="list-style-type: none"> Guidelines have been established. Meetings held with Associations and participants of the fishery outlining their reporting obligations. |
| | 1b | <ul style="list-style-type: none"> Information Management System has been established Staff resources assigned for validation and CDS processing. CDS Noted as a requirement for exporting |
| | 1c | <ul style="list-style-type: none"> Catch Tagging certification requirements are laid out in guidelines and have been communicated to associations at meetings. |
| | 1d | <ul style="list-style-type: none"> MPR not applicable to Indonesia |
| | 1e | <ul style="list-style-type: none"> A three stage verifications system has been established. |
| | 2 | <ul style="list-style-type: none"> Indonesia reports that there is no recreational fishing for SBT |
| | 3 | <ul style="list-style-type: none"> Tags are uniquely numbered, example CDS- CTF/CDF confirms that unique tag identifiers are used. |
| 3.1 (vi) | 1 | <ul style="list-style-type: none"> Not applicable- no Indonesia Carrier Vessels authorized for high seas |
| | 2 | <ul style="list-style-type: none"> Rules established and implemented for >30GT fleet |
| 3.1 (vii-ix) | 1-3 | <ul style="list-style-type: none"> This MPR is not applicable to Indonesia |
| 3.1 (x-xii) | 1(a) – 1(e) 2 | <ul style="list-style-type: none"> Tags are within the specification requirements Logbook recording requirements are established The Information Management System is relatively new but established |
| 3.1 (xix-xxi) | 1a – 1f & 2 | <ul style="list-style-type: none"> Authorised validator lists are maintained, sent to CCSBT for confirmation Decrees of the Director of Capture Fisheries provide authorisation to validators who have attested by signature to the requirements of the validation. Certification is by officers of the company- information on the signing officer is provided. Guide is available on CDS implementation for validation officers. |
| 3.1 (xxii – xxv) | 1a -1d & 2a – 2b | <ul style="list-style-type: none"> Operating systems were described. Validators have received instruction and guidance on validation procedures. Directorate of Surveillance and Directorate General Capture Fisheries preside over sanctions |
| 3.1 (xxvi) | 1 | <ul style="list-style-type: none"> Documents are stored in electronic and hard copy for the min. 3 years. |
| 3.1 (xxvii-xxviii) | 1 - 2 | <ul style="list-style-type: none"> Stated as submitted electronically on a monthly basis |
| 3.1 (xxix – xxxi) | 1, 2a – 2f & 3 | <ul style="list-style-type: none"> Validation responsibilities are correctly assigned Verification is carried out by different individuals There are 3 types of verification- vessels, catch and domestic market There is a 3 monthly review of CDS documents |
| 3.3 (i-v) | 1a, b 2a-e 3a-h | <ul style="list-style-type: none"> Indonesia declares that these MPR's are not applicable |
| 3.3 (vi) | 1a,b 2 | <ul style="list-style-type: none"> Indonesia declares that these MPR's are not applicable |
| 3.3 (vii) | 1 | <ul style="list-style-type: none"> Indonesia declares that these MPR's are not applicable |
| 6.5 | 1 | <ul style="list-style-type: none"> Submission of reports was declared to be within the reporting timeframe. |
| | 2 | <ul style="list-style-type: none"> Indonesia declares that these MPR's are not applicable |

b) Weaknesses associated with MEMBER's SBT fishery and associated management in relation to CCSBT's MPRs

WEAKNESSES

| Obligation | MPR | Weaknesses |
|------------|-------------|---|
| 1.1 (i) | 1 | <ul style="list-style-type: none"> The SBT allocation is transferred to a catch quota but it is administered via 2 associations and this does not include allocation to all possible fleet segments- noticeably the artisanal sector (10-<30GT) appears to be outside of the allocation system. They system does not have a mechanism to prevent over catches of SBT once the National quota is reached. SBT is not regulated as a fishery but as bycatch in other fisheries. This is a major weakness as regulations do not appear to be applied in the target fishery to limit SBT catches. |
| | 2a (i) | <ul style="list-style-type: none"> Allocation from MMAF is not directly to company, quota holder or a vessel. This is done by associations. |
| | 2a (ii) | <ul style="list-style-type: none"> Vessels that are not members of the two quotoa owning associations may not be incentivised or required to fill out logbooks for SBT- as they do not have an SBT allocation anyway. |
| | 2a (iii) | <ul style="list-style-type: none"> The system for weekly reporting of LSTLV's and monthly reporting of artisanal vessels is established although landings in provincial ports do not appear to be collated and reported for some time (3 monthly). |
| | 2b | <ul style="list-style-type: none"> Discrepancies, clerical errors may reduce reporting effectiveness |
| | 2c (i/ii) | <ul style="list-style-type: none"> There was insufficient information and evidence of how the random inspection system operates and if it is effective. |
| | 3 | <ul style="list-style-type: none"> The system is poorly established for accounting for SBT from artisanal vessels and has potential weaknesses for LSLTV relating to CDS administration. |
| | 4 | <ul style="list-style-type: none"> Sanctions appear to be applied to associations but no evidence to support the nature of sanctions and if they are effective. If sanctions are applied, the continual over-catch is evidence that this system is not effective. No evidence of the at sea inspection was presented (except biological observer programme). |
| 1.1 (iii) | 1a | <ul style="list-style-type: none"> There is no carry forward history and no procedure in place. Over catch has been a feature in recent years and whilst verification of the figure takes place, there are weaknesses arising from the lack of quota provided to non-association members and CDS distribution in general. |
| | 1b | <ul style="list-style-type: none"> No carry forward procedure required. |
| 2.3 | (i)1a | <ul style="list-style-type: none"> Indonesia declares that the requirement is not applicable to transhipment of fresh tuna. This transhipment activity is currently not by authorized vessels although it remains uncertain as to the applicability of the Transhipment Resolution and MPR for authorization and for monitoring of such activity. |
| | 1b, c, d, e | <ul style="list-style-type: none"> Indonesia declares that the requirement is not applicable However, there is a regulation that requires carrier vessels to accommodate observers. |
| 2.3 (iii) | 1 | <ul style="list-style-type: none"> Whilst deemed not applicable, transhipment of fresh tuna is only allowed by same company as the catcher vessel. (refer to 2.3(i)1a). Relating to transhipment of fresh tuna within the inter-company |

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| | | <p>transfers. There is no designated location for transshipment although noted to be in national waters.</p> <ul style="list-style-type: none"> • Additional to the clarification of whether this activity falls outside of the MPR, there is also a weakness in that there is a potential for loss of traceability of SBT back to catcher vessel. Under the current rules, tagging may take place at landing. If fresh tuna is transhipped from multiple vessels, loss in traceability to vessel may occur for untagged fish. As the associations apply the quota, it may not be a concern or easily resolved but may also lead to unnecessary clerical resources to correct mistakes once CDS documents are validated. • Observers are stated to be presence during transshipment activity but it is uncertain if this occurs all of the time. |
| 3.1 (i-v) | 1a | <ul style="list-style-type: none"> • None noted. |
| | 1b | <ul style="list-style-type: none"> • Potential weakness in carrier vessels for fresh SBT noted above. |
| | 1c | <ul style="list-style-type: none"> • As previously noted for vessels that do not access CDS from an association and which may not be registered and may land to regional ports. |
| | 1d | <ul style="list-style-type: none"> • MPR not applicable to Indonesia |
| | 1e | <ul style="list-style-type: none"> • Three methods of verification has been established and are noted to identify cases of untagged SBT or re-used tags. However, long term corrective/preventative actions were not described. Sanctions were not described other than for administrative reasons and there is no evidence on the number, the detail and the effectiveness of these. Over-catch demonstrates that sanctions if applied are not effective at reducing SBT catches. |
| | 2 | <ul style="list-style-type: none"> • MPR not applicable/uncertain if exemption for carrier vessels is granted |
| 3.1 (vi) | 1 | <ul style="list-style-type: none"> • Refer to previous MPR's for carrier vessels |
| | 2 | <ul style="list-style-type: none"> • As noted earlier, a weakness relating to how or if the CDS operates effectively for non-association vessels and if catch is subtracted from the annual quota or added to the overall annual catch. |
| 3.1 (vii-ix) | 1-3 | <ul style="list-style-type: none"> • This MPR is not currently applicable to Indonesia |
| 3.1 (x-xii) | 1(a) – 1(e) 2 | <ul style="list-style-type: none"> • As noted already for vessels not within the associations. • Tagging can take place at landing which may allow for potential loss in traceability, particularly for transhipped SBT to carriers which themselves are not required to fulfil CDS requirements. |
| 3.1 (xix-xxi) | 1a – 1f & 2 | <ul style="list-style-type: none"> • Validation officers are present at the major landing ports and SBT landed regionally are reported through the provincial system. The extent to which these catches are included in CDS, are validated and in one timeframe is uncertain and is a weakness in the system. |
| 3.1 (xxii – xxv) | 1a -1d & 2a – 2b | <ul style="list-style-type: none"> • None specific to 1a MPR's/No FV's registered in Indonesia • Noted weakness in tagging at landing and possible loss in traceability • Uncertainty with respect to how consistent or effective administrative sanctions are with respect to supporting good compliance |
| 3.1 (xxvi) | 1 | <ul style="list-style-type: none"> • Non specific to MPR |
| 3.1 (xxvii-xxviii) | 1 - 2 | <ul style="list-style-type: none"> • None specific to this MPR |
| 3.1 (xxix – xxxi) | 1, 2a – 2f & 3 | <ul style="list-style-type: none"> • Uncertainty of validation effectiveness for <30GT vessels that are not members of associations and land outside of the main ports. |
| 3.3 (i-v) | 1a, b 2a-e | <ul style="list-style-type: none"> • Weakness may be apparent in the system with respect to effectively |

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| | 3a-h | dealing/applying sanctions and notifying CCSBT with respect to incomplete, suspect or invalidated consignments. |
| 3.3 (vi) | 1a,b 2 | <ul style="list-style-type: none">Indonesia declares that these MPR's are not applicable |
| 3.3 (vii) | 1 | <ul style="list-style-type: none">Indonesia declares that these MPR's are not applicable |
| 6.5 | 1 | <ul style="list-style-type: none">Non specific to MPR |
| | 2 | <ul style="list-style-type: none">Indonesia declares that these MPR's are not applicable |

c) Risks (threats to compliance) associated with MEMBER's SBT fishery and associated management in relation to CCSBT's MPRs

RISKS (THREATS)

| Obligation | MPR | Risks (Threats) |
|------------|----------|---|
| 1.1 (i) | 1 | <ul style="list-style-type: none"> A risk of poor accountability of all SBT catches since the allocation system is only operational for catches from vessels that are members of one of the two associations. The CDS system is also administered via the associations and commercial pressure may lead to risks of mis-reporting. Other non member vessels do not receive quota. This exclusion creates a risk of over-catches which is occurring, regardless of whether there is good accountability on the over-catch. The Akmani Agreement does not allow for effective regulation, including the application of sanctions. This lack of enforcement is a risk to supporting compliance with the national allocation. The management approach taken for the third association, ASPERADU requires further clarification. If the quota will be divided 3 ways, under a similar agreement as Akmani, the risks of over-catch is unlikely to reduce and potentially will increase. |
| | 2a (i) | |
| | 2a (ii) | |
| | 2a (iii) | |
| | 2b | |
| | 2c (i) | <ul style="list-style-type: none"> The current administration system may result in gaps in CDS reporting and compliance, in both LSTLV's and the smaller, artisanal fishery. |
| | 2c(ii) | <ul style="list-style-type: none"> Lack of direct control of allocation may increase risk of mistakes and lag time in validation, solving errors and reporting to CCSBT. |
| 1.1 (iii) | 1a | <ul style="list-style-type: none"> Size and scale of possible landing locations presents a geographical risk for Indonesia |
| | 1b | |
| 2.3 | (i)1a | <ul style="list-style-type: none"> Indonesia declares that the requirement is not applicable to transshipment of fresh tuna. This transshipment activity is currently not by authorized vessels although it remains uncertain and a potential risk to compliance as to the applicability of the Transshipment Resolution and MPR for authorization and for monitoring of such activity. |
| 2.3 (iii) | 1 | <ul style="list-style-type: none"> Whilst deemed not applicable, transshipment of fresh tuna is only allowed by same company as the catcher vessel. (refer to 2.3(i)1a. Specific to the transshipment of fresh tuna within the inter-company transfers, CDS is only implemented on the catcher vessel and not the carrier. There is no designated location for transshipment although noted to be in national waters. As noted in the weakness or gap in the system, a risk of loss in traceability and a risk in mis-reporting and loss in accountability on all landings on SBT. |
| | 1c | <ul style="list-style-type: none"> As previously noted for vessels that do not access CDS from an Association and which may not be registered and may land to regional ports- a risk that there is no incentive to comply with CDS requirements. |
| | 1e | <ul style="list-style-type: none"> Akamani Agreement is not supported by regulation and there is a risk that under the Agreement, meaningful sanctions are difficult to apply at a company or vessel level to support compliance. |
| | 2 | <ul style="list-style-type: none"> MPR not applicable/uncertain if exemption for carrier vessels is granted-noted as a weakness or a point for clarification within the Resolution for Transshipment. |

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| | 2 | <ul style="list-style-type: none"> As noted earlier, a risk relating to access to CDS for non-association vessels. |
| 3.1 (x-xii) | 1(a) – 1(e) 2 | <ul style="list-style-type: none"> As noted already for vessels not within the Association. Tagging can take place at landing which may be a risk to potential loss in traceability, particularly for transhipped SBT to carriers which themselves are not required to fulfil CDS requirements. |
| 3.1 (xix-xxi) | 1a – 1f & 2 | <ul style="list-style-type: none"> Validation officers are present at the major landing ports and SBT landed regionally are reported through the provincial system. The extent to which these catches are included in CDS, are validated and in what timeframe is a risk to accurate and timely reporting. |
| 3.1 (xxii – xxv) | 1a -1d & 2a – 2b | <ul style="list-style-type: none"> Noted risk in tagging at landing and possible loss in traceability Uncertainty with respect to how consistent or effective administrative sanctions are with respect to supporting good compliance |
| 3.1 (xxix – xxxi) | 1, 2a – 2f & 3 | <ul style="list-style-type: none"> Risk to loss of SBT CDS/validation for <30GT vessels that are not members of associations and land outside of the main ports. |

6 Recommendations for Improvement

Based on the SWOT analysis and review of the effectiveness of management systems against the CCSBT minimum performance requirements the review team has provided recommendations for improvement of the management system specific to the MPR's investigated under this QAR. It is stressed that the QAR is a third party, objective review based on the information available during the period of the audit. Confirmation of performance requires a good deal of documentary evidence to confirm that procedures are implemented and operating effectively.

Recommendations are made based on the overall review outcome and on specific elements of the MPR.

Broad recommendations are made if there was consideration for quite radical changes to the allocation system for SBT in Indonesia.

Top Level Recommendations:

- SBT is not managed as a directed fishery but as a bycatch in other tuna fisheries. The effectiveness of managing SBT catches within a national allocation within the current system should be reviewed. The review should include the management systems which apply to yellowfin, bigeye and other directed tuna fisheries. If SBT is managed as a bycatch fishery, the rules within these fisheries should be reviewed for consistency with CCSBT Requirements and to ascertain if such measures can be applied within these overall tuna management systems for the regulation of SBT by-catches.
- A specific allocation system of the SBT quota to each fishing company and their vessels has not been implemented directly by the Indonesian Management Agencies. Instead, the allocation is administered through industry parties through a formal agreement (Akmani) with the 2 main tuna associations for tuna species. The associations are also given responsibility to administer the CDS to their members under the terms of the agreement. The Akmani Agreement should be reviewed and where necessary, strengthened to ensure it is mandatory and that sanctions can be applied to any violations that occur. In tandem with this, it should be an offense for associations or their members to catch above their allocation of SBT and for this to occur, a set of measures are required to manage SBT by-catch on the fishing grounds.
- The two main associations focus on the larger LTLV's, although they represent a large majority of the catching sector from thirty tonne to a few hundred tonne GT vessels. However, there are a large number of smaller, non-member artisanal vessels that can encounter SBT as bycatch during their fishing operations and under the current system, do not receive quota or may only do so, if they supply via the two main associations. The allocation of 100% of the SBT allocation should be reviewed. This formal agreement with the associations does not appear effective, if adherence to the national allocation is its objective. Improvements to the system could also include withholding SBT quota for later allocation and withholding quota for artisanal catches of SBT.

- However, review, reform and strengthening of the existing system is required prior to this.
- Fairly, substantial over catches have been reported in 2011 and 2012 and more so in recent 2013 reports against SBT annual allocations. These have been attributed mainly to the authorized LSTLV which operate within the association administered quota system. However, evidence on the exact analysis of the over catch by vessel or vessel segment (LSTLV, tonnage classification, artisanal fleet, ports of landing) and mitigation activities specific to the prevention of further over catches was not available to the QAR. Hence, the reviewers comment that further evidence is required to substantiate the effectiveness of the more recent measures introduced for CDS implementation, validation, monitoring and verification.
- Once the fleet reaches the allowable catch, there does not appear to be a mechanism to affect subsequent reductions in SBT by catches in other tuna fisheries. As a sub-point, the incidence and fate of discarding of SBT where quota is no longer available may also require further review and consideration. [The reviewers note that Indonesia commented on developing an observer programme under the Directorate General Capture Fisheries additional to the RITF scientific observer programme].
- Indonesia has established an operational system for managing CDS validation and verification. There may be cause for considering a reformation of the allocation system to more directly link the management and its administration with companies and their vessels that catch SBT through a legally binding arrangement. The associations could act a vehicle to support the determination of quota allocation per vessel which is then administered accordingly through a legal agreement such as a catch cap. Each Association could administer CDS to these vessels but the arrangement should allow for direct accountability of SBT landings per vessel and allow sanctions to be applied where necessary.
- Vessels that reach their allocation would have to cease fishing or receive additional available quota, either retained by MMAF or transferred from available quota of other vessels.
- Avoidance of SBT and discarding: There was no information of how or if long line vessels adapt their fishing behaviour once the associations have reached 100% of their SBT allocation. There are scientific reports provided by various Indonesian institutes that provide data on catch rates and hook rates per month (from observer data) across all species and this data may have use on establishing SBT avoidance measures (CCSBT – ESC/ 1309/SBT FISHERIES – Indonesia, 2012).
- Since pelagic long-lining is a multi-species gear, avoidance and mitigation measures should be reviewed, investigated and developed for SBT:
 - Possible adaptation of gear and fishing operations to reduce SBT incidence and/or allow increased chance of escape. (Weak hook initiatives, line configuration, depth setting, lunar phases, shooting/hauling periods).

- Possible implementation of closed hot spots and buffer zones based on temporal and spatial scales where incidence of SBT encounters is high.
- A review of MCS for vessels; on-board recording of SBT encounters with gear, releases and verification (direct observation or alternative methods such as remote, tamper-proof cameras), VMS establishment for all vessels and effectiveness should also be considered as part of the adoption of mitigation/avoidance measures.

Vessels that are not part of an association receiving allocation

- Under the current system, vessels that are not members of the associations do not receive an allocation. A review of the quota allocation, validation and verification systems for these catches is also required.
- There are two main ports formally recognised for official SBT landings. It is unclear how this definition is used as SBT is also landed in other regional ports albeit in smaller quantities.

Classification of Carrier Vessels

- The current practice of transshipment of fresh tuna by inter-company carrier vessels requires clarification with respect to whether it falls within the scope of Resolution on Establishing a Program for Transshipment by Large-Scale Fishing Vessels. Section 1 suggests that it is not applicable while Section 2 may suggest it is applicable for authorisation if not for full monitoring requirements.
- The current regulations allow SBT to be tagged either at capture or at point of landing. Where carriers are used, the system should be reviewed to ensure loss of traceability does not occur. An alternative approach would be to make tagging at point of capture mandatory and/or the regulation should be reviewed for consistency with accurate and transparent CDS reporting and catch statistics.
- There are a number of formal verification systems implemented including random vessel inspections, catch inspections and cross checking of CDS documents at processing and domestic market. However, there is an absence of a risk based review or audit mechanism of the entire system and used to focus verification resources. [The details of the random inspection system were not presented during the review and its effectiveness could not be evaluated].

Table 10 – Recommendations (opportunities) identified by the strengths, weaknesses, opportunities and threats (SWOT) analysis conducted for Indonesia’s systems determining compliancy to CCSBT MPRs

OPPORTUNITIES (RECOMMENDATIONS FOR THE PRESENT ALLOCATION SYSTEM)

| Obligation | MPR | Recommendations |
|------------|----------|--|
| 1.1 (i) | 1 | <ul style="list-style-type: none"> Review and improvement of the formal agreement and establishment of regulations to support its enforcement setting compliance with the national allocation as the objective. |
| | 2a (i) | <ul style="list-style-type: none"> Review/ improve the administration of the tagging system by administering tags and CDS forms to all vessels directly or ensure Akmani Agreement is strengthened to allow effective management and sanctions to be applied. Introduction of standard operating procedures in partnership with associations. Withholding a percentage of SBT quota for the artisanal catches of SBT and administering this directly may also support accountability for SBT in regional ports. |
| | 2a (ii) | <ul style="list-style-type: none"> The application of firm sanctions against fishing vessel > 30GT for failing to use, complete logbook correctly and/or submit within required time. Repeat sanctions should result in removal of company/vessel permission to fish for SBT. This may require legislative reform. |
| | 2a (iii) | <ul style="list-style-type: none"> Implementation of items listed above would also require further established of the Management Information System (MIS) not just for CDS verification but also for CDS and tag administration. |
| | 2b | |
| | 2c (i) | <ul style="list-style-type: none"> Review of the effectiveness of the current vessel inspection system and reform to improve where weaknesses occur. |
| | 2c(ii) | <ul style="list-style-type: none"> Refer to 2a (iii) |
| | 4 | <ul style="list-style-type: none"> Review and reform of regional/provincial reporting system to the central CDS/MIS administration to allow for timely verification of SBT catches at all ports and statistical reporting to CCSBT |
| 1.1 (iii) | 1a | <ul style="list-style-type: none"> Included in section 1.1(i) |
| | 1b | |
| 2.3 | (i)1a | <ul style="list-style-type: none"> Indonesia declares that the requirement is not applicable to transshipment of fresh tuna. This transshipment activity is currently not by authorized vessels although it remains uncertain and a potential risk to compliance as to the applicability of the Transshipment Resolution and MPR for authorization and for monitoring of such activity. Review of applicability of Indonesia under Section 1 and 2 of the Resolution for fresh tuna carrier vessel transshipments. |
| 2.3 (iii) | 1 | <ul style="list-style-type: none"> The transshipment is supported by rules and permit (SIKPI). However, the potential risks identified could be reviewed with respect to actual practice and whether there is loss in accountability of SBT during the tagging and CDS reporting. |
| | 1c | <ul style="list-style-type: none"> Refer to 4 specific to the <30GT fleet that currently does not receive quota. |
| | 1e | <ul style="list-style-type: none"> As noted, Akamani Agreement is not supported by regulation and there is a risk that under the Agreement, meaningful sanctions are difficult to |

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| | | apply at a company or vessel level to support compliance. |
| | 2 | <ul style="list-style-type: none"> • Clarification within the Resolution for Transshipment. |
| | 2 | <ul style="list-style-type: none"> • As noted earlier, reform of the allocation of quota and CDS for vessels that are currently excluded. |
| 3.1 (xix-xxi) | 1a – 1f & 2 | <ul style="list-style-type: none"> • Review and reform of regional reporting systems as noted previously. |
| 3.1 (xxii – xxv) | 1a -1d & 2a – 2b | <ul style="list-style-type: none"> • Noted risk in tagging at landing and possible loss in traceability • Uncertainty with respect to how consistent or effective administrative sanctions are with respect to supporting good compliance |
| 3.1 (xxix – xxxi) | 1, 2a – 2f & 3 | <ul style="list-style-type: none"> • A three step verification system is in place, applying to portside vessel inspections, catch inspections and market (domestic inspections). There is also a system of monthly CDS review, associated with reporting requirements and a three monthly CDS review. These systems are still in development as noted by MMAF during the QAR and improvements may have already been reported. Opportunity to improve the verification systems through mechanisms that extend the market verification to export markets both CCSBT members, cooperating parties and with non-members should be considered. • Additionally, a risk based approach could be undertaken during annual reviews to support the identification of areas where resources should be applied, including portside vessel inspection, carrier vessel inspection, company inspection, greater market inspection etc. Current information of catch statistics could form the basis of targeted inspection across all ports, including regional ports. |

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7 Post Final Report Member Comments

Members that take part in the QAR are invited to make comment on the outcome or content of the report in this section.

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Appendix 3 – Copies of fishery logbooks & other paperwork

| Appendix | Form | Source |
|----------|--|---|
| 3.1 | Agreement allocation of Southern Bluefin Tuna quota for ATLI and ASTUIN | Dit. Fish Resources, Directorate General of Capture Fisheries |
| 3.2 | <i>Catch Monitoring Form (CMF)</i> | Directorate General of Capture Fisheries |
| 3.3 | <i>Catch Tagging Form (CTF)</i> | Directorate General of Capture Fisheries |
| 3.4 | <i>Re-Export/Export after landing of Domestic Product Form</i> | Directorate General of Capture Fisheries |
| 3.5 | Fishing Log book | Directorate General of Capture Fisheries |
| 3.6 | Peraturan Presiden RI no 109 tahun 2007 tentang Pengesahan Convention for the Conservation of Southern Bluefin Tuna (Tuna Sirip Biru Selatan) | LEMBARAN NEGARA REPUBLIK INDONESIA TAHUN 2007 NOMOR 148 |
| 3.7 | Quota Letter of Warning to Indonesian Tuna Long Line Association (ATLI) | Directorate General of Capture Fisheries |
| 3.8 | Regulation of Minister Marine Affairs and Fisheries RI No.18/MEN/2010 concerning Fishing Log book | Ministry of Marine Affairs and Fisheries |
| 3.9 | Regulation of Minister Marine Affairs and Fisheries RI No.1/PERMEN-KP/2013 concerning vessel monitoring system and fish carrier | Ministry of Marine Affairs and Fisheries |
| 3.10 | List of vessel registered catch of Southern Bluefin Tuna catch | Directorate General of Capture Fisheries |
| 3.11 | Surat Keputusan Direktorat Jenderal Perikanan Tangkap No.20/KEP-DJPT/2014 tentang Penunjukan Petugas Validasi <i>Catch Documentation Scheme (CDS)</i> untuk jenis Tuna Sirip Biru Selatan (<i>Southern Bluefin Tuna</i>) | Directorate General of Capture Fisheries |
| 3.12 | Regulation of Minister Marine Affairs and Fisheries RI No.26/MEN/2013 concerning Capture fishery business in Regional Fisheries Management NRI | Ministry of Marine Affairs and Fisheries |
| 3.13 | Technical guidance of Catch Documentation Scheme in management of Southern Bluefin Tuna (SBT) | Dit. Fish Resources, Directorate General of Capture Fisheries |
| 3.14 | Regulation of Minister Marine Affairs and Fisheries RI no PER12/MEN/2012 concerning Capture fishery business in high seas | Ministry of Marine Affairs and Fisheries |

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| 3.15 | Storage for File Catch Documentation Scheme (CDS) | Dit. Fish Resources, Directorate General of Capture Fisheries |
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Resolution on Amendment of the Resolution on Illegal, Unregulated and Unreported Fishing (IUU) and Establishment of a CCSBT Records of Vessel over 24 meters Authorized to Fish for Southern Bluefin Tuna. Indonesian Southern Bluefin tuna Fishery A National Report Year 2012 Prepared by , Fayakun Satria ,Budi Nugraha, Duto Nugroho , Lilis Sadiyah ,and Kiroan Siregar , Research Center for Fisheries Management and Conservation (RCFMC); Research Institute for Fisheries Enhancement and Conservation (RIFEC) and the Research Institute for Tuna Fisheries (RITF).

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Report of the Extended Scientific Committee for the Sixteenth Meeting of the Scientific Committee (19-28 July, 2011 Bali, Indonesia)