

IOTC-2021-CoC18-FL09[E]-IDN

Annex: Response to the Letter of Feedback regarding compliance issues.

The CoC ACKNOWLEDGED the difficulties that Indonesia continue to face to fully implement the following CMMs adopted by the Commission:	Response
<ul style="list-style-type: none"> • Has not fully implemented the requirement for Marking of gears, as required by Resolution 15/04. 	<p>For gear marking, Indonesia is still in the progress of putting into place regulation and implementation for gear marking, however gear marking in practices has been implemented in a voluntary basis by several fishers groups. FAO has supervised Indonesia through research institution by pilot projects to find appropriate technology (low cost) for gear marking. Nevertheless, it's still a project activity, hopefully this collaboration will provide recommendation/advices to manage of gear marking policy particularly in tuna fishing gear.</p> <p>The Ministry of Marine Affairs and Fisheries of Indonesia (MMAF) in collaboration with Food and Agriculture Organizations of The United Nations (FAO) and World Animal Protection (WAP) conducted a project in 2018. The project title is Gear Marking Pilot Study in Indonesian Small Scale Gillnet Fisheries, With Reference to FAO's Draft Guidelines on the marking of Fishing Gear.</p> <p>The purpose of this project is to test means and methods of marking gillnets in accordance with FAO's Draft Guidelines on the Marking of Fishing Gear ('the Draft Guidelines') and explore the scope for a retrieval and recycling scheme.</p>
<ul style="list-style-type: none"> • Has not reported catch & effort for the coastal fisheries, as required by Resolution 15/02. 	<p>Data entry and processing of catch and effort for the coastal fisheries are using Pelagos system since 2014.</p> <p>For data 2019, Indonesia has reported the catch and effort for the coastal fisheries through letter 15/S.Kel/ZEEI/VI/2020 of 29 June 2020 using form 3CE (integrated in form 3CE for surface fisheries) instead of form 3AR.</p>
<ul style="list-style-type: none"> • Has not reported catch & effort for the surface and longline fisheries to IOTC standard, as required by Resolution 15/02. 	<p>Data entry and processing of catch and effort for the surface are using Pelagos system since 2014.</p> <p>For data 2019, Indonesia has reported the catch and effort for the surface fisheries through letter 15/S.Kel/ZEEI/VI/2020 of 29 June 2020.</p> <p>Data entry and processing of catch and effort for the long line fisheries are based on Logbook Program. For data 2019, Indonesia has reported the catch and effort for the long line fisheries through letter 15/S.Kel/ZEEI/VI/2020 of 29 June 2020.</p>

The CoC ACKNOWLEDGED the difficulties that Indonesia continue to face to fully implement the following CMMs adopted by the Commission:	Response
<ul style="list-style-type: none"> • Has not reported size frequency for coastal and surface fisheries, as required by Resolution 15/02. 	<p>Data entry and processing of size frequency for the coastal and surface fisheries are using Pelagos system since 2014. For data 2019, Indonesia has reported the size frequency for the coastal and surface fisheries through letter 15/S.Kel/ZEEI/VI/2020 of 29 June 2020.</p>
<ul style="list-style-type: none"> • Has not reported size frequency for longline fisheries, as required by Resolution 15/02. 	<p>For data 2019, Indonesia has reported the size frequency for long line fisheries through letter 15/S.Kel/ZEEI/VI/2020 of 29 June 2020.</p>
<ul style="list-style-type: none"> • Has not reported catch and effort on sharks, as required by Resolution 17/05. 	<p>For data 2019, Indonesia has reported the catch and effort on sharks through letter B.24981 / DJPT / PI.110.D1 / XII / 2020 of 1 December 2020 based on scientific observer program.</p>
<ul style="list-style-type: none"> • Has not reported size frequency on sharks, as required by Resolution 17/05. 	<p>For data 2019, Indonesia has reported size frequency on sharks through letter B.24981/DJPT/PI.110.D1/XII/2020 of 1 December 2020 based on scientific observer program.</p>
<ul style="list-style-type: none"> • Has not implemented the regional observer scheme, as required by Resolution 11/04. 	<p>Indonesia has reported regional observer scheme through National Scientific Report (IOTC-2020-SC23- NR07) part 6.3 Regional Observer Program (ROP) & Regional Observer Scheme (ROS).</p>
<ul style="list-style-type: none"> • Has not submitted observer reports to the standard required by Resolution 11/04. 	<p>For 2019, Indonesia has submitted observer reports through letter B.24981/DJPT/PI.110.D1/XII/2020 of 1 December 2020.</p>
<ul style="list-style-type: none"> • Has not transposed the prohibition to gaff, lift by the gill slits/spiracles, punch holes through the bodies. Obligation to release alive, implementation of live release handling procedures of mobulid rays national legislation, as required by Resolution 19/03. 	<p>Gaff, lift by the gill slits/spiracles, punch holes through the bodies has been banned by terms and conditions of authorisation to fish since 2011 as stipulated in the annex of Ministerial Regulation of Ministry of Marine Affairs and Fisheries No. 2/2011.</p> <p>In general, conservation and protection of ecologically related species, including sharks and rays are governed through Government Regulation No. 7/1999 and Ministerial Regulation of Ministry of Marine Affairs and Fisheries No. 58/2020 on capture fisheries business.</p> <p>In addition, Manta rays (<i>Manta spp.</i>) are fully protected under Ministerial Decree No. 4/KEPMEN-KP/2014.</p> <p>Report of mobulid interaction monitored through ROS reported in to national report to SC-IOTC annually, however there are no incident occurred related mobulid interaction with tuna fishery.</p>

The CoC ACKNOWLEDGED the difficulties that Indonesia continue to face to fully implement the following CMMs adopted by the Commission:	Response
<ul style="list-style-type: none"> • Has not provided information on actions taken domestically to monitor catches of Blue Shark as required by Resolution 18/02. 	<p>Monitoring on catches of Blue Shark is under the Ministerial Regulation of Ministry of Marine Affairs and Fisheries No. 48/2014 concerning on fishing logbook as well as the Ministerial Regulation of Ministry of Marine Affairs and Fisheries No. 58/2020 concerning on capture fisheries business.</p> <p>Indonesia has reported of Blue Sharks catches through National Scientific Report (IOTC-2020-SC23-NR07) part 5.1.3 and WPEB (IOTC-2020-WPEB16-21).</p>
<ul style="list-style-type: none"> • Has not provided information on actions taken domestically to monitor catches & manage fisheries of Striped Marlin, Black Marlin, Blue Marlin and Indo-pacific Sailfish as required by Resolution 18/05. 	<p>Monitoring on catches and management fisheries of Striped Marlin, Black Marlin, Blue Marlin and Indo-pacific Sailfish is under the Ministerial Regulation of Ministry of Marine Affairs and Fisheries No. 48/2014 concerning on fishing logbook as well as the Ministerial Regulation of Ministry of Marine Affairs and Fisheries No. 58/2020 concerning on capture fisheries business.</p> <p>Catches closely monitored through ROS and port sampling program at main landing sites.</p> <p>Indonesia has reported of Billfishes catch through National Scientific Report (IOTC-2020-SC23- NR07) part 5.4 and WPEB (IOTC-2020-WPEB16-21) and WPB (IOTC-2020WPB18-20).</p>
<ul style="list-style-type: none"> • Has not transposed the prohibition to retain on board, tranship, land, any Striped Marlin, Black Marlin, Blue Marlin, Indo-pacific Sailfish smaller than 60 cm Lower Jaw Fork Length into national legislation as required by Resolution 18/05. 	<p>Monitoring on catches of Billfishes is under the Ministerial Regulation of Ministry of Marine Affairs and Fisheries No. 48/2014 concerning on fishing logbook as well as the Ministerial Regulation of Ministry of Marine Affairs and Fisheries No. 58/2020 concerning on capture fisheries business.</p> <p>Currently Indonesia has yet transposed of Res 18/05 since billfishes dominated by swordfish. However the Catches closely monitored through ROS and port sampling program at main landing sites reported through National Scientific Report and Working party of Billfishes annually.</p>
<ul style="list-style-type: none"> • Has not designated competent Authority, as required by Resolution 16/11. 	<p>Indonesia has established regulation regarding PSM implementation, which is Ministerial Regulation No. 39 year 2019. Nevertheless, It has not been implemented since the process of determining the designated competent authority is still on progress.</p>