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**ANALYSIS BY THE IOTC SECRETARIAT OF INDONESIA'S PILOT PROJECT FOR MONITORING AT SEA  
TRANSHIPMENTS**

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Date: 30 April 2021

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**PURPOSE**

In accordance with a request from the Commission, the IOTC Secretariat is required to provide the Compliance Committee with an analysis on whether Indonesia's pilot project for monitoring at-sea transhipments offers the same level of assurances as those provided by IOTC Regional Observer Programme.

**BACKGROUND**

The Commission agreed in 2017 that a national observer programme may be used by Indonesia instead of the regional programme for transhipment by large-scale fishing vessels, as established by Resolution 17/06. It was further agreed that the Indonesia transhipment programme was to be set up in consultation with the IOTC Secretariat, as a two-year pilot project. The results of the project, including data collection, reports and the effectiveness of the project were to be examined in 2019 by the IOTC Compliance Committee on the basis of a report prepared by Indonesia and analysis by the IOTC Secretariat. However, Indonesia informed the 2019 meeting of the Compliance Committee that it was unable to implement the pilot project as the concerned regulation was still being developed and that Indonesia will propose a rescheduling for the pilot project to start in 2019.

At its twenty-third Session, in 2019, the Commission received a proposal from Indonesia to amend Resolution 18/06, which had superseded Resolution 17/06, in order to reschedule Indonesia's pilot project for a national at-sea transhipment programme. The proposal was duly approved as Resolution 19/06 by the Commission, on the following basis:

- that the re-scheduling of the two-year pilot project is done in consultation with the IOTC Secretariat;
- that national observers shall be trained to at least one of tuna-RFMO regional observer programme standards, and
- observers will carry out all of the functions of the regional observer, including provision of all data as required by the IOTC regional observer programme and the reports equivalent to those prepared by the ROP Contractor.

In its decision, the Commission requested that the results of the project, including data collection, reports and the effectiveness of the project shall be examined in 2021 by the IOTC Compliance Committee on the basis of a report prepared by Indonesia and analysis by the IOTC Secretariat. The Commission further requested that, in its analysis, the IOTC Secretariat shall include whether the programme offers the same level of assurances as those provided by ROP and that it shall also explore the feasibility of obtaining an IMO number for the concerned carrier vessels.

**DISCUSSIONS AND RESULTS OF THE ANALYSES**

Indonesia has provided document *IOTC-2021-CoC18-04c - Indonesia's Pilot project on at sea transhipments*, which has been made available as a meeting document for CoC18.

In the absence of any other sources of information on the pilot project, such as deployment reports and biweekly reports, the IOTC Secretariat's analyses is singularly based on document *IOTC-2021-CoC18-04c*, and is presented in Table 1, below.

Also included in Table 1, is Indonesia's comments on the IOTC Secretariat's analyses, which have been obtained through a consultative process.

**Table 1.** Analysis of Indonesia's Pilot project on at sea transshipments.

Measure to analyse	Results of analyses	Indonesia's comments
Consultation with the IOTC Secretariat on the re-scheduling the pilot project.	No consultation with the IOTC Secretariat took place.	We apologize for not having consultation with the IOTC Secretariat on the re-scheduling the pilot project, since we had no information in regard to the need of former consultation with the IOTC Secretariat regarding the matter.
National observers shall be trained to at least one of tuna-RFMO regional observer programme standards.	No information was provided on any training that the observer(s) might have undertaken.	Every year MMAF conducts an upgrading observer program with training materials that refer to tuna-RFMO regional observer programme's standard. The training materials are based on the Ministerial Regulation No. 01 year 2013 on Observer on Board, and the Technical Guidelines on Observer on Board for Fishing Vessel and Carrier Vessel which already adopted all the Regional Observer Programme regulation.
Observers will carry out all of the functions of the regional observer.	Unable to analyse - No individual observer reports have been submitted to the IOTC Secretariat.	The individual observer reports will be submitted by 7 May 2021 since some data need more time to be revisited.
Data collection.	Data on species and quantity transhipped provided to the Secretariat as part of an unedited version of document <i>IOTC-2021-CoC18-04c</i> . For confidentiality purposes the quantity transhipped per vessel has been edited out of the version of the document made available to CoC18.	Noted.
Reports as required under the ROP: (i) Deployment reports. (ii) Biweekly reports	No individual deployment reports have been submitted to the IOTC Secretariat, as per the standard of the regional observer programme.  No biweekly reports, which include information on vessels and observers' activities and any problems encountered deploying observers have been submitted to the IOTC Secretariat, as per the standard of the regional observer programme	The individual deployment reports will be submitted by 7 May 2021 since we need to revisit the data.

Measure to analyse	Results of analyses	Indonesia's comments
Effectiveness of the project.	The IOTC Secretariat is unable to offer an independent assessment of how effective the pilot project has been, based on document <i>IOTC-2021-CoC18-04c</i> , only.	Noted
Whether the programme offers the same level of assurances as those provided by the ROP.	<p>It is not possible for the IOTC Secretariat to offer an independent assessment on whether the pilot programme offers the same level of assurances as those provided by ROP, based on document <i>IOTC-2021-CoC18-04c</i>, only. Such an assessment would require that the IOTC Secretariat have access to the individual observer deployment reports.</p> <p>The information provided in sections 3 – 6 of document <i>IOTC-2021-CoC18-04c</i> does not indicate that it has been verified by observers or been derived from observer reports.</p> <p>Furthermore, upon reviewing the information on authorisation periods the IOTC Secretariat noted that some vessels that have transhipped had been deleted from the IOTC Record of Authorised Vessels before the pilot project started, and some other vessels transhipped after their authorization period had expired. The list of vessels and their dates of deletion or last authorization periods are provided in Table 2.</p>	<p>The information provided in sections 3 – 4 has been derived from observer reports. Meanwhile, the information provided in sections 5 – 6 is part of verification process conducted by DG of Capture Fisheries and DG of Surveillance officers.</p> <p>Regarding the vessels which had been deleted from the IOTC Record of Authorised Vessels, we would like to clarify that some of those vessels were deleted since they changed their fishing gear into squid jigging and operated in Indonesia EEZ only. Meanwhile, the two vessels, namely JOLO TUNDO-II and PERINTIS JAYA-36, have been updated in the IOTC list of authorised vessels with IOTC Record Number for each are 16766 (JOLO TUNDO-II) and 16683 (PERINTIS JAYA-36).</p> <p>In the case of the vessels with the authorisation had expired, we would like to clarify that by the time those vessels conducted transshipment, they were in the process of updating their fishing license. Currently, all the vessels have updated their fishing license.</p>
Explore the feasibility of obtaining an IMO number for the concerned carrier vessels	<p>None of the eight Indonesian carrier vessels listed in Annex V of Resolution 19/06 have an IMO number according to the IOTC Record of Authorised Vessels. For the two carrier vessels which received transshipments under the Pilot Project, <i>HIROYOSHI – 17</i> and <i>PERINTIS JAYA – 89</i>, document <i>IOTC-2021-CoC18-04c</i> indicates that they are not eligible for IMO numbers.</p> <p>It should be noted that in the 2013 Assembly of the IMO agreed that the IMO Ship Identification Number Scheme be extended to ships of 100 gross tonnage and above. The Scheme was further extended by agreement of the IMO Assembly's 30<sup>th</sup> Session in 2016, to include, amongst others, fishing vessels of</p>	Regarding the IMO number, the eight Indonesian wooden carrier vessels listed in Annex V of Resolution 19/06 didn't have an IMO number since according to the latest IMO Resolution A.1117(30), wooden ships other than fishing vessels are not eligible to obtain IMO number. Nevertheless, currently, some of carrier vessels listed in the revised Annex V of Resolution 19/06 have obtained IMO number, they are Hiroyoshi 17, Mutiara 36, Perintis Jaya 89, Naga Mas Perkasa 89, Kilat Maju Jaya – 21.

Measure to analyse	Results of analyses	Indonesia's comments
	<p>steel and non-steel hull construction and all motorized inboard fishing vessels of less than 100 gross tonnage down to a size limit of 12 metres in length overall (LOA) authorized to operate outside waters under the national jurisdiction of the flag State.</p> <p>Therefore, in principle all eight carrier vessels listed in Annex V of Resolution 19/06, should have been able to obtain an IMO numbers since the coming into effect of these IMO Assembly decisions.</p>	

**Table 2.** The list of fishing vessels that transhipped under the Pilot project, whose date of deletion or last authorization periods were prior to the commencement of the Pilot project.

IOTC No.	Sorting Order*	Date Reported	Vessel Name	Date of deletion or Authorized To
791	0	02-Feb-17	PERINTIS JAYA VI	24-Apr-16
2474	0	02-Feb-17	CAHAYA MAKMUR	06-Aug-07
2798	0	02-Feb-17	PERINTIS JAYA - 68	26-Jun-16
2803	0	02-Feb-17	PERINTIS JAYA - VII	22-Dec-16
4345	0	02-Feb-17	BINTANG MUTIARA I	05-Feb-16
4698	0	02-Feb-17	SINAR MAS NO. 1	26-Nov-16
4736	0	02-Feb-17	JOLO TUNDO - II	08-Jul-15
13934	0	02-Feb-17	PERINTIS JAYA 168	29-Dec-15
15650	0	02-Feb-17	DAMAI JAYA VII	31-Aug-14
15651	0	02-Feb-17	DAMAI JAYA VIII	28-Sep-14
15652	0	02-Feb-17	DAMAI JAYA IX	10-Oct-14
16191	0	02-Feb-17	MUTIARA - 18	30-Jul-16
16362	0	02-Feb-17	SUMBER REJEKI - I	03-Aug-16
16664	1	29-Mar-18	BINTANG MUTIARA III	24-Aug-18
16681	1	12-Apr-18	BINTANG MUTIARA - 26	10-Apr-19
16150	0	11-May-18	KM. PERINTIS JAYA 10	11-May-18
16211	0	11-May-18	KM. PERINTIS JAYA - 38	11-May-18
16259	0	11-May-18	KM. PERINTIS JAYA - 49	11-May-18
16817	0	11-May-18	BINTANG MUTIARA - 28	11-May-18
15854	1	27-Nov-18	PERINTIS JAYA - 9	17-Sep-19
16788	1	12-Mar-19	BINTANG KEJORA	03-Sep-19
8846	0	02-Apr-19	PERINTIS JAYA - 36	02-Feb-19

\*Sorting Order 0 = Deletion.

Sorting Order 1 = Vessel on the current of Authorised of Vessels.

## RECOMMENDATIONS

That the Compliance Committee:

1. **REVIEW** documents *IOTC-2021-CoC18-04c* and *IOTC–2021–CoC18–04c Add1*.
2. **PROVIDE** advice to the Commission on whether the Pilot project should be extended or integrated into the IOTC's regular Regional Observer Programme for monitoring at-sea transshipments.