

## **INFORMATION PAPER ON INDONESIA'S PILOT PROJECT FOR TRANSHIPMENT AT SEA (Side Consultation, Feedback on Members' Intervention During CoC20, Progress of Implementation, and Next Step)**

### **1. Side Consultation with the Secretariat and MRAG**

Indonesia undertook a consultation on Indonesia's pilot project for transshipment at sea with the Secretariat and MRAG during the CoC20 meeting. Based on those consultations, several requirements need to be further improved to fully comply with, while others could be adapted to suit the national conditions. The consultation process also resulted in a plan to have additional training for Indonesia on database refinement and other needs for the Pilot Project. Further consultation with the Secretariat and MRAG will be taken to discuss the training schedule and arrangement.

### **2. Feedback on Members' Intervention During CoC20**

3.

#### **a. Reporting of Quantities Transhipped by Species During 2021-2022**

Regarding the reporting of quantities transhipped by species during 2021-2022 that was inquired during the CoC20, Indonesia submitted those data completely to the Secretariat through documents (a) Reporting template on at-sea transshipment 2021 on 15 September 2022, and (b) Reporting template on at-sea transshipment 2022 on 14 April 2023. The Secretariat has acknowledged receipt of those files.

#### **b. Is there a document or some kind of term of reference or a document summarizing what the pilot project is supposed to achieve and the obligation Indonesia is supposed to fulfill?**

- Indonesia conducted the Pilot Project based on standards of ROP requirements provided by the Secretariat with the goal to comply with the standards and be integrated into the IOTC Regional Observer Programme (ROP).
- Step by step consultation has been summarized in Annex 1 of the result of assessment of the pilot project (Document: Analysis by the IOTC Secretariat of Indonesia's Pilot Project for monitoring at-sea transshipments).
- Based on the recommendation by CoC20, Indonesia in consultation with the Secretariat [and MRAG], will develop specific ToR as a guideline to implement and achieve the goal of integrating the pilot project into the IOTC ROP.

#### **c. What are the improvement brought to the pilot project between 2021 and 2023 to improve reporting obligation?**

The improvement brought to the pilot project between 2021 and 2023 in regards to reporting obligations are described in the various documents submitted to the Secretariat by Indonesia during 2021-2023 as requested in the ROP requirements, as in the following:

- a) Indonesia submitted 4 (four) documents to the Secretariat on 30 December 2021, as listed below:
- 1) The list of observers that were deployed on the carrier vessels listed in the pilot project;
  - 2) The training modules;
  - 3) The list of observers who have had medical certificates;
  - 4) Request for observer deployment.
- b) Indonesia submitted 6 (six) documents to the Secretariat on 6 December 2022 as follows:
- 1) The training modules in English;
  - 2) CV of the observer;
  - 3) Medical certificate of the observer;
  - 4) Request for observer deployment for 2022;
  - 5) Pre-sea inspection;
  - 6) Transshipment declaration for 2022 of both fishing vessel and carrier vessel.
- c) Indonesia submitted 12 (twelve) documents to the Secretariat on 14 April 2023 as follows:
- 1) The training modules in English;
  - 2) CV of the observers;
  - 3) Letter of assignment for observers 2021-2022;
  - 4) Medical certificate of the observers;
  - 5) Training certificate;
  - 6) Transshipment Declaration 2021-2022;
  - 7) Observer trip report 2021-2022;
  - 8) Pre-sea inspection 2022
  - 9) The list of the LSTLVs registered in the IOTC Record of Fishing Vessels which have transhipped during 2021-2022;
  - 10) The quantities by species transhipped during 2021-2022;
  - 11) The list of the carrier vessels that are authorised to receive at-sea transshipments from its LSTLVs in the IOTC area of competence in 2021-2022;
  - 12) Annual report of transshipment for 2021-2022.

**d. What measures will Indonesia take to address the deficiencies identified in the analysis of the Secretariat, particularly on the progress of developing the ROP database?**

Way forward to meet the ROP standards, as follows:

- A consultation was undertaken with the Secretariat and MRAG during the CoC20 meeting. Based on those consultations, several requirements need to be further improved to fully comply with, while others could be adapted to suit the national conditions. The consultation process also resulted in a plan to have additional training for Indonesia on database refinement and other needs for the Pilot Project. The training is planned to be supported by the Secretariat and MRAG.
- Indonesia is currently reviewing its technical guideline on the implementation of an onboard observer program, for both scientific and transshipment at sea observers. Indonesia is also developing electronic reporting for the observer and

hopefully, the application and system can fast-forward the observer reporting since current manual (paper-based) reporting requires greater time to produce the comprehensive observer reports.

- e. The check list of operations and details to monitor is not the same between the regional observer programme vs. the national programme of Indonesia. What does the national observer check? What does he not check?**

Indonesia developed an observer form for transshipment at sea in 2013 under the Minister Regulation No. 1 year 201 on Observer on Fishing Vessels and Carrier Vessels through several workshops involving experts from IOTC, WCPFC, OFCF, and related stakeholders to comply with RFMOs requirements. The regulation was amended by Minister Regulation No. 33 year 2021 on Observer on Fishing Vessels and Carrier Vessels.

In 2022, Indonesia identified the observer requirements in the IOTC standards that have not been covered in the national regulation through training with the CapMarine for the scientific observer and also several workshops. Indonesia is preparing a draft of Technical Guidelines for the Observer on Board of Fishing Vessels and Carrier Vessels to cover the requirements based on the IOTC standards, including updating the observer form. It is expected that the Technical Guideline to be finalized by the end of 2023 after having further consultation with the Secretariat and MRAG.

- f. Not clear from the report whether all transshipments at sea were observed.**

All (100%) of the transshipment at sea activities during 2021-2022 were observed and reported in the observer's individual report.

#### **4.3. Progress on the Implementation of the Pilot Project 2017-2022**

In 2014, Indonesia established a policy banning transshipment in Indonesia's fisheries management area through Regulation of the Minister of Marine Affairs and Fisheries of Republic of Indonesia Number: 57/PERMEN-KP/2014. The regulation is intended to prevent IUU fishing practices from transshipment activity. In 2016, Indonesia established the Regulation of the Director General of Capture Fisheries, Number: 1/PER-DJPT/2016 on Joint Fishing Operation to prevent IUU fishing and sustainability purpose. The regulation enables transshipment at sea activities by Indonesian vessels under strict monitoring and control through e-monitoring on board (CCTV) and observers on board. The transshipment activities could only be allowed by having a joint operation scheme on transshipment at sea between the carrier vessel owner and fishing vessel owners and acknowledged by the Head of the Fishing Port and Head of the Marine and Fisheries Resources Surveillance Office.

There is a need for transshipment on the high seas for Indonesian tuna longline fishing vessels. However, Indonesia's fleet was dominated by wooden fishing and carrier vessels. Meanwhile, as an IMO non-convention vessel, wooden carrier vessels are not eligible vessels to be observed by an IOTC observer regarding implementing the resolution

on Establishing a Program for Transshipment by Large-Scale Fishing Vessels. Such conditions prevent Indonesian wooden carrier vessels from supporting Indonesian tuna longline fishing vessels in maintaining the quality of fish products.

Therefore, during the 21<sup>st</sup> Session of IOTC in 2017, Indonesia presented issues regarding the transshipment at sea to the Commission. Indonesia also requested support and understanding from the EU and Japan delegations on the difficulties of implementing the transshipment at sea in accordance with IOTC (MRAG) standards. Indonesia proposed texts in the proposal after having inputs from EU and Japan delegations with some notes that the transshipments will be conducted in accordance with the requirements in the resolution and by coordinating with the Secretariat. The Commission (S21) adopted Resolution 17/06 On establishing a programme for transshipment by large-scale fishing vessels, which includes a provision of a two-year pilot project of transshipment at sea by eight Indonesian wooden carrier vessels using a national observer programme.

The Pilot Project was intended to be implemented in 2018 after the joint operation scheme on transshipment at sea was agreed upon by related Parties in 2018 for fishing and carrier vessels that operated in the Indian Ocean. However, the Pilot Project was unable to be implemented due to a force majeure (burnout) that was experienced by one carrier vessel that was ready to implement the transshipment activity under the joint operation scheme and pilot project.

During the first extension period of the two-year pilot project (2019-2020), the pilot project has already been implemented under Resolution 19/06. In 2019, one of the Indonesian wooden carrier vessels was authorized to Tranship at Sea as listed in Annex V of Resolution 19/06, KM. Hiroyoshi 17, had operated in the high seas since 24<sup>th</sup> October 2019. Meanwhile, in 2020, two vessels listed in Annex V operated in the high seas, namely KM. Hiroyoshi 17, and KM. Perintis Jaya 89. In 2020, the Government of Indonesia also established a higher level of regulation through Ministerial Regulation No. 58/2020 on Capture Fisheries Business to govern relevant monitoring instruments and technical aspects regarding the operation of the carrier vessels. The regulation supports Indonesia's compliance effort with the implementation of Resolution 19/06.

The second extension period of the two-year pilot project (2021-2022) was implemented under Resolution 21/02 and Resolution 22/02. During 2021, from twelve vessels in Annex V Resolution 21/02, six vessels were conducting transshipment at sea, namely Bahari – 116, Bandar Nelayan 2017, Hiroyoshi – 17, Kilat Maju Jaya – 21, Naga Mas Perkasa 89, and Permata Tuna Wijaya 01. In December 2021, Indonesia proposed a replacement of three vessels (KMC 102, Perintis Jaya 89, and United XVI) in Annex V resolution 21/02, with Bandar Nelayan 271, Perintis Jaya 36 dan Bandar Nelayan 519, respectively. The replacement was that those vessels did not operate due to the condition of vessels no longer suitable for transporting tuna products. During 2022, from seventeen vessels in Annex VI of Resolution 22/02, eleven vessels were conducting transshipment at sea, namely Bandar Nelayan 2018, Bandar Nelayan 519, Bahari – 116, Bandar Nelayan 2017, Hiroyoshi – 17, Naga Mas Perkasa 89, Permata

Tuna Wijaya 01, Nusantara Jaya 12, Bandar Nelayan 271, Perintis Jaya 36, and Bahari Nusantara.

Indonesia proposes to maintain transshipment at sea by Indonesian wooden carrier vessels can be observed by a national observer on board through the Pilot Project with the following considerations:

- a. Transshipment at sea is important to maintain the fish product's quality
- b. The pilot project will give an opportunity for Indonesian national observers to be trained in RFMO standards. Indonesian observers have been trained under RFMO standards and acknowledged as a national programme by WCPFC Regional Observer Programme (ROP) in 2016.
- c. The pilot project will give an opportunity for the national observer programme to expand Indonesia's national observers' role in the IOTC region.
- d. If Indonesia can implement the pilot project, it can be a success story for other developing states interested in including their wooden carrier vessels to be eligible vessels to receive at sea-transshipment in the high-seas of IOTC area of competence.

5.

#### 4. Next Step

Indonesia proposed to extend the pilot project for another two-year (2023-2024) and to be reviewed by the Compliance Committee (CoC) in 2025. Within the two-year, Indonesia is planning to improve the implementation of the pilot project through several measures, as follows:

- Review the technical guideline for implementing an onboard observer program for scientific and transshipment at sea observers.
- Developing electronic reporting for the observer and, hopefully, the application and system can fast-forward the observer reporting since current manual (paper-based) reporting requires greater time to produce the comprehensive observer reports.
- Training by the Secretariat and MRAG in 2023/2024 on database refinement and other needs for the Pilot Project.
- Consultation with the Secretariat and MRAG on the implementation of the Pilot Project.

Indonesia is aiming to integrate its national observer program into the IOTC Regional Observer Programme (ROP) in 2025. The integration of the project into the ROP shall be subject to a new decision of the Commission in 2025 and be implemented when the new Resolution entry into effect in 2025. Further consultation will be taken with the Secretariat on the process of integrating into the IOTC ROP.