

## **TRANSITIONAL PLAN**

### **For Improving Indonesia's National Observer Programme Toward Full IOTC ROP Compatibility (2025–2027)**

#### **Background**

From 2017 to 2024, Indonesia conducted a Pilot Project to develop and implement transshipment procedures using wooden carrier vessels. This project also aims for achieving fully recognized Indonesia national observer program that aligned with the IOTC Regional Observer Program.

An Independent Reviewer (IR) completed a review of Indonesia's pilot project, presenting their findings at the IOTC CoC22-2025. The IR recognized the project's significant progress towards meeting IOTC ROP requirements. However, the review also identified weaknesses in administrative, operational, and technical aspects. These included inconsistencies in deployment records, substantial reporting delays, non-compliance with medical and safety certifications, inadequate observer training, and ambiguous data validation and Standard Operating Procedures (SOPs). The IR's report outlined specific actions to advance the project following its completion.

This two-year Transitional Plan proposal directly addresses the IR's findings and recommendations, establishing a realistic and phased approach for Indonesia to evolve its pilot project into a fully recognized national observer program, aligned with the IOTC ROP, by 2027.

#### **Objective**

To address identified shortcomings and implement a national observer programme fully aligned with IOTC ROP by 2027, ensuring compliance, transparency, and safety in transshipment monitoring.

#### **Activities and Timeline**

Table 1. Activities and Timeline for Transitional Plan for IOTC ROP Compatibility

No	Component	Activities	Timeline	# IOTC Res 24-05 Req*
1	Observer Training	a. Upgrade observer training modules to RFMO-compatible standards with the assistance of the IOTC Observer Consortium	Q2–Q4 2025	4, 11
		b. Include ROP duties, reporting templates, infraction procedures, and conduct guidelines	Q2–Q4 2025	11, 12
2	Certification	a. Ensure all observers have valid Basic Safety Training and medical certificates, and have signed Standards of Conduct and Behaviour.	Q2–Q4 2025	6, 7

3	Reporting & Data	a. Address delays in 5-day and end-of-trip reports via digital reporting tools (e.g., Starlink-based).	Q3 2025–Q2 2026	12
		b. Enforce deadlines: 5-day reports (every 5 days), end-of-trip (within 30 days).	Q1 2026 onward	12, 13, 19
		c. Include structured SOPs and pre-deployment briefings.	Q3 2025–Q1 2026	12
		d. Address delays in submission of transshipment declaration by owners/operators/masters of fishing vessels to the MMAF.	Q4 2025–Q2 2026	15
		e. Address delays in submission of transshipment declaration by MMAF to the Secretariat.	Q4 2025–Q2 2026	16
		f. Formally require submission of landing declaration by owners/operators/masters of carrier vessels.	Q4 2025–Q2 2026	17
		g. Ensure Secretariat informed of updates to the transshipment schedule.	Q4 2025–Q2 2026	10
4	Legal & SOPs	a. Improve SOPs to include: <ul style="list-style-type: none"> <li>- list of approved observers,</li> <li>- deployment request,</li> <li>- transshipment declaration submission by owner/operator/master of the fishing vessel and carrier vessel,</li> <li>- landing declaration submission by owner/operator/master of the carrier vessel,</li> <li>- record of infractions,</li> <li>- stowage separation using tag which include transshipment number and date marked,</li> <li>- data validation,</li> <li>- MoU between carrier vessel and fishing vessel,</li> <li>- Standard of Conduct and Behavior of Observer,</li> <li>- Check point based on Annex IV of Resolution 24/05</li> </ul>	Q3 2025–Q1 2026	2, 3, 5, 7, 8, 11, 15, 16, 17, 21, 23

		- Statistical document validation		
5	Database Coordination	a. Synchronize Indonesia's observer database with IOTC's systems	Q4 2025–Q2 2026	20
		b. Ensure cross-verification of deployment requests and trip records	Q1 2026 onward	10
6	Monitoring & Review	a. Submit progress reports to IOTC annually	2025–2027	19
		b. Independent Review	Q1 2027	

\* = See Table 2 as reference

### Expected Outcomes

- Indonesia National Observer Programme achieves compatibility with IOTC ROP by mid-2027 (prior to CoC24 and S31).
- All observers have valid BST certificates, training, and medical certifications.
- Consistent and timely submission of reports in IOTC-approved formats.
- Strengthened overall digital infrastructure to support the implementation of conservation and management measures.

### Conclusion

Indonesia reaffirms its commitment to improving transparency and compliance in tuna fisheries. This transitional plan serves not only as a roadmap to align the Indonesia National Observer Program with the IOTC ROP, but also as a foundation for more inclusive, equitable transshipment governance that supports small-scale fishers and sustainable resource use in the Indian Ocean.

Table 2. Implementation status of the 23 requirements examined in the assessment

#	IOTC Resolution 24-05 requirements	Implementation
1	Provide the list of carrier vessels authorized to receive tuna and tuna-like species and sharks to the IOTC Secretariat.	Yes
2	Separate stowage from different donor vessels and stowage plan.	Working alternative
3	Establish and sign a memorandum of understanding (MOU) with the owner / operator of all carrier vessels.	Partial at draft date
4	Observer training.	Partial
5	Indonesia maintains the list of approved observers.	Partial
6	Certified medical fitness for working on CVs.	Partial
7	Observer signs Standards of Conduct and Behaviour.	Partial
8	Deployment request sent to and acknowledged by the Secretariat.	Partial
9	Planning and deployment of observers onboard carrier vessels.	Yes
10	Secretariat informed of updates to the transshipment schedule.	Partial
11	Observer checks each fishing vessel and monitors the transshipment operations, in accordance with Annex IV of Resolution 24/05.	Partial
12	At-sea reports as required by paragraph 5 of the ROP submitted to the IOTC Secretariat.	Partial
13	Submission of deployment report within 30 days as required by para 28 of IOTC Resolution 24/05.	Partial
14	Pre-transshipment notification.	Yes
15	Owner / operator / master of the fishing vessel submits the transshipment declaration.	Partial
16	Owner / operator / Master of the carrier vessel submits transshipment declaration to the flag State and Secretariat	Partial
17	Owner / operator / master of the carrier vessel submits the landing declaration.	No
18	Submission of the supply declaration.	Yes
19	Submission of observer report compiling the information collected, in accordance with the paragraph 5 of Annex IV of Resolution 24/05, to Secretariat.	Partial
20	Database is maintained.	Partial
21	Possible infractions are highlighted.	No
22	Annual internal report on the implementation of the Pilot Project requested by the CoC.	Yes
23	Process of statistical document validation.	Partial

Source: Table 16 of the independent review of Indonesia's Pilot project for Monitoring at Sea Transshipment (TC-2025-CoC22-05\_Add1\_Rev1)