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Ref: B-2276/DJPT-1/TA-210-01/14/2013

April, 23, 2013

Mr. Rondolph Payet  
Executive Secretary  
Indian Ocean Tuna Commission (IOTC)  
PO Box 1011 Victoria, Mahe, Seychelles

**Subject : Information Paper for Reducing Unreported At-Sea Tuna  
Transshipment in the Indian Ocean**

Dear Mr. Rondolph Payet,

Concerning proposals for new or revised Conservation and Management Measures for the consideration of the Commission at the upcoming 17th Session (Mauritius, 6–10 May 2013), Indonesia would like to submit Information Paper as attached.

We would appreciate if you acknowledge receipt of this Information Paper, and circulate it during the meeting. Thank you very much for your kind cooperation.

Best regards,

**AGUS. A. BUDHIMAN**  
Director for Fisheries Resources Management

Cc:  
Director General for Capture Fisheries;

## Information Paper for Reducing Unreported At-Sea Tuna Transshipment in the Indian Ocean:

### *Sustainability Challenges for Small Scale Tuna Fisheries*

#### A. Problem Statement

1. It is widely known that Indonesia is one the major player in global tuna industry in terms of tuna producers as well as tuna processors. With the vast expand of waters of approximately 5.7 million km<sup>2</sup> and adjacent to the two major Ocean: the Indian dan Pacific Oceans, Indonesia waters have been endowed with various types of pelagic and demersal fishes, including tuna and tuna-like fish. Global production of tuna reaches amount of 6.6 million ton, which is dominated from the Pacific Ocean as of 70% and followed by the Indian Ocean. In terms of area, Indonesia is surrounded by these two main sources of tuna. In the context of ASEAN countries for example, together with Philippines, Indonesia dominates the production of tuna, which is recorded as 60% of total ASEAN countries production of tuna. In this regards, the fact that Indonesia is one of the major player of tuna has been very much expected.
2. The structure of Indonesia tuna fisheries, however, is not dominated by the large scale tuna fisheries, but small scale fisheries. Using the agreed definition of small scale tuna fishing vessels which has length less than 24 m, small scale tuna fishing entities in Indonesia is estimated more than 80% of total tuna fishing fleets. In this regards, tuna fisheries in Indonesia can be considered as one of the main source of livelihood of the small scale fishers. Consequently, an effort to maintain the sustainability of this type of livelihood is very essential for this country.
3. It is also internationally confirmed that sustainability of tuna fisheries has become mandatory effort for all of tuna fisheries management schemes and regimes. Through policy documents such as CMM (*Commission Management Measures*), there are many measures have been produced to maintain the sustainability of global tuna fisheries, including the measures of tuna transshipment both in port as well as at sea. Under the international resolution on compliance, transshipment measures include an explicit requirement that transshipment of tuna and tuna---like species take place in port, and outlines procedures by which member nations may, should they choose to do so, authorize large scale tuna long line vessels (LSTLV) to transship at sea. Consequently, at sea transshipment of tuna caught by purse seine vessels in the ICCAT, IATTC and IOTC Convention is prohibited (ISSF, 2011).
4. In the case of Indonesia, lately, it has became a common practice that small scale tuna fishing units are conducting some kind of transshipment at due to practical and economic reasons during their fishing at the high seas, which might not in line with the international compliance. However, maintaining this practice without proper regulation and report, in the long term could threat the sustainability of tuna fisheries not only in term of global but also the sustainability of the small-scale tuna fisheries itself.
5. This notes is made in order to propose several pointers of proposal from the Government of Indonesia regarding to the future effort in reducing practices of at-sea transshipment

without proper reporting, especially those are related to the small scale tuna fisheries in Indonesia.

## **B. Government of Indonesia Preliminary Proposal**

### **B.1. The need of in-depth investigation of the at-sea transshipment practices involving small scale tuna fishing in Indonesia and its respective cost and benefits.**

6. It is needed to conduct in-depth investigation of the anatomy of the small scale tuna fisheries in Indonesia including the practices of at-sea transshipment. This investigation should answers several strategic questions such as in what magnitude the small scale tuna fishing practices the at-sea transshipment, how does the mechanism of at-sea transshipment conducted by the small scale tuna fishing, catch data reporting, etc.

### **B.2. Increasing Resources Efficiency as a tool of ensuring sustainability of tuna fisheries.**

7. It can be argued that at-sea transshipment practiced by the small scale tuna fishing vessel in Indonesia is one of the short term effort to increase the resources efficiency especially in the context of the value of tuna resources. It is widely known that the quality of handling of the tuna catch is still considered low among the small scale tuna fishing units. Considering that they caught tuna at the high seas and far from the landing port, the quality of tuna catch would be decreasing and it is possible to be rejected by the processor unit. It can be considered as the resources inefficiency. By asking larger tuna fishing units to take their catch as at-sea transshipment, it can help the small scale tuna fishing to get to the highest value of tuna catch. In this case, all of these practices should be reported and monitored by the competent authority i.e. the Ministry of Marine Affairs and Fisheries (MMAF).

### **B.3. Business Opportunities Created**

8. Considering the argument of increasing resources efficiency for the small scale tuna fishing, it also can be argued that the new business opportunities created through the provision of transshipment services as long as regulated, monitored and reported by the Government of Indonesia. In the long term, these business entities can be also authorized under the RFMO's management measure so that the good practices in the small scale tuna fisheries can be ensured.

### **B.4. Need of Grace Period for Practicing the At-Sea Transshipment for Small Scale Fisheries**

9. Considering the above short term and long term efforts dealing with the practices of at-sea transshipment involving the small scale tuna fisheries in Indonesia, it is also important to propose such grace period to transform from the short term efforts, i.e. practicing at-sea transshipment as it is with more intensive reports and monitoring by the Government of Indonesia, to the long term effort, i.e. reducing unreported at-sea transshipment by creating new regulation as well as creating new business opportunity of the transshipment services regulated both in the national and international tuna fisheries management measures such as those applied within RFMOs.



**C. Closing Remarks.**

10. As major player in the global tuna fisheries, Government of Indonesia is committed to apply any management measures that ensuring the sustainability of tuna fisheries both in terms of national as well as global interests. In this regards, Government of Indonesia would take a position as leading country in ensuring the application of sustainable principles for the tuna fisheries now and the future for the sake of conservation of tuna resources and the welfare of the tuna fishers as well.