



COMMISSION
Twenty-Second Regular Session
1-5 December 2025
Manila, Philippines (Hybrid)

**Proposal to revise CMM 2023-01 related to the high seas purse seine effort limit adjustment
for Indonesia**

WCPFC22-2025-DP09_Rev02
27 November 2025

Submitted by Indonesia



MINISTRY OF MARINE AFFAIRS AND FISHERIES
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Reff: B.3398/DJPT.2/PI.130/XI/2025

November 26, 2025

Subject: Latest Update of Indonesia Proposal for the Revision of CMM 2023-01 on Conservation and Management Measure for Bigeye, Yellowfin, and Skipjack Tuna in the Western and Central Pacific Ocean

To: Ms. Rhea Moss-Christian
Executive Director Western and Central Pacific Fisheries Commission (WCPFC)

Dear Ms. Rhea Moss-Christian,

Following our updated proposal for high seas purse seine effort limit regulated in CMM 2023-01 concerning Conservation and Management Measures for Bigeye, Yellowfin, and Skipjack Tuna in the Western and Central Pacific Ocean, last October, Indonesia would like to inform the latest update of our proposal along with the the information paper **On Indonesia's Strategic Compliance Improvement Plan for High Seas Purse Seine Operation and Effort Limit Under the WCPFC**. The draft of the latest update is attached.

We appreciate it very much if you could acknowledge receipt of this letter.

Thank you for your kind cooperation and looking forward to hearing from you.

On Behalf of the Director General of Capture Fisheries
Director of Fish Resources Management,



Ditandatangani
Secara Elektronik

Syahril Abd Raup

Cc. Director General of Capture Fisheries

INFORMATION PAPER ON INDONESIA'S STRATEGIC COMPLIANCE IMPROVEMENT PLAN FOR HIGH SEAS PURSE SEINE OPERATION AND EFFORT LIMIT UNDER THE WCPFC

Submitted by Indonesia

1. Background

Indonesia, as a developing state and as a signatory state to the Western and Central Pacific Fisheries Commission (WCPFC), is committed to the sustainable utilization and conservation of highly migratory tuna stocks. Indonesia recognizes that improving compliance performance, particularly for high seas operations, is critical to ensure alignment with WCPFC Conservation and Management Measures (CMMs), including CMM 2023-01 for tropical tunas.

Indonesia has implemented several reforms to strengthen monitoring, control, and surveillance (MCS) mechanisms for fisheries including tuna. These efforts include the application of quota-based policy with verified landing data; the development of improved data collection infrastructure to facilitate more accurate and real-time reporting (e-PIT); the enhancement of the national fishing logbook system; and continued capacity building initiatives to support the effective implementation of Electronic Monitoring.

However, challenges remain in achieving full compliance with high seas-related obligations, particularly in areas of:

- 100% observer coverage (human and/or electronic),
- vessel marking consistent with WCPFC and FAO standards,
- VMS operation and data reporting to the WCPFC Secretariat,
- vessel registration in the WCPFC Record of Fishing Vessels (RFV).

This Information Paper outlines Indonesia's Strategic Compliance Improvement Plan, developed to address these challenges and support its proposal to revise CMM 2023-01, particularly with respect to high seas purse seine operations and effort limits.

2. Objectives

The main objectives of this plan are to:

- a. Enhance Indonesia's compliance with WCPFC conservation and management measures for high seas fishing.
- b. Ensure transparency and accountability through comprehensive observer and/or electronic monitoring coverage.
- c. Strengthen coordination with the WCPFC Secretariat for integrated surveillance and enforcement.
- d. Improve Indonesia's compliance profile under the WCPFC Compliance Monitoring Scheme (CMS), supporting equitable participation in high seas fisheries.

3. Strategic Compliance Areas and Actions

a. Observer Coverage (Human and/or Electronic Monitoring System)

- **Current Challenge:** Limited observer deployment capacity and high operational costs have hindered 100% coverage.
- **Strategic Actions:**
 - 1) Establish a third party mechanism for National Observer Providers to optimize personnel deployment across fleets and ports.
 - 2) Strengthen observer training in line with WCPFC Regional Observer Programme (ROP) standards.
 - 3) Develop the Electronic Monitoring (EM) system to complement human observers and achieve total coverage.

b. Vessel Marking Compliance

- **Current Challenge:** Inconsistent application of WCPFC and FAO vessel marking standards among Indonesian vessels.
- **Strategic Actions:**
 - 1) Harmonize national regulations with WCPFC CMM 2004-03 and FAO marking standards.
 - 2) Require vessel marking verification during licensing and port inspections.
 - 3) Conduct awareness campaigns to ensure operators' understanding of correct vessel marking practices.

c. VMS and Reporting

- **Current Challenge:** Gaps in integration between Indonesia's national VMS and the WCPFC VMS, resulting in incomplete real-time reporting.
- **Strategic Actions:**
 - 1) Mandate 24-hour active VMS transmission for all high seas vessels. As of now, some of the approved MTU provider has already been utilized by several vessels, namely CLS Triton, Orbcomm ST6100, IDP 690.
 - 2) The National Compliance Dashboard prioritizes tracking vessel movements, logbook submissions, and data anomalies for vessel operating in high seas.

d. Vessel Registration in WCPFC RFV

- **Current Challenge:** Delays in updating vessel registration information in the WCPFC Record of Fishing Vessels (RFV).
- **Strategic Actions:** Develop an integration system that harmonizes the RFMO vessel registration with the national fishing permit.

4. Expected Outcomes

- Strengthened compliance performance and improved standing under the WCPFC Compliance Monitoring Scheme (CMS).
- Full alignment of Indonesia's high seas fleet operations with WCPFC obligations/CMM
- Enhanced transparency and traceability of Indonesian tuna fisheries.
- Improved negotiating leverage in future revisions of CMM 2023-01, particularly regarding equitable high seas effort allocation.

5. Closing

Indonesia's Strategic Compliance Improvement Plan XX demonstrates the country's strong commitment to enhancing compliance with WCPFC measures and promoting sustainable tuna fisheries management.

The implementation of this plan will not only improve Indonesia's compliance performance but also provide the technical foundation to support Indonesia's proposal for revising **CMM 2023-01**, ensuring that developing States are afforded fair and equitable access to the high seas along with its responsibility in the Western and Central Pacific Ocean (WCPO).

A. Explanatory Note

Indonesia, as a key member of the Western and Central Pacific Fisheries Commission (WCPFC), relies heavily on marine resources for economic development and food security. Under Conservation and Management Measure (CMM) 2023-01, Indonesia's high seas purse seine effort is recorded as (0) zero days. Any expansion of such activities requires prior notification to the WCPFC. Furthermore, paragraph 43 of CMM 2023-01 stipulates that Commission Members, Cooperating Non-Members, and Participating Territories (CCMs)—except for Small Island Developing States (SIDS) and Indonesia—must maintain the number of large-scale purse seine vessels (LSPSVs) over 24 meters in length with freezing capacity operating between 20°N and 20°S at the levels established under CMM 2013-01. This provision effectively allows Indonesia to conduct high seas fishing operations using its purse seine vessels over 24 meters in length.

Indonesia's participatory rights to conduct purse seine fishing in the high seas were recognized during WCPFC8 and WCPFC9, with approximately 500 fishing days. This recognition was based on a working paper presented during the 4th Scientific Committee Meeting in 2008, which outlined effort limit data for the national waters of non-PNA countries and the high seas.

In 2016, official correspondence between Indonesia and the WCPFC Secretariat confirmed that the development of Indonesia's purse seine fleet does not require formal approval from the Commission and that the replacement scheme is not applied, if Indonesia complies with relevant notification and monitoring requirements under applicable CMMs (letters as attached).

However, the implementation of Indonesia's national moratorium policy on new vessel construction since 2015 has constrained the development of its high seas fleet capacity. As a result, until 2024, Indonesia did not operate purse seine vessels in the high seas and did not receive any increase in its high seas effort limit, while other CCMs maintained or increased theirs.

Given these circumstances, Indonesia now seeks to restore its status with an enhanced high seas purse seine effort limit approximately 1000 fishing days to exercise its recognized rights to fish within the high seas of the Convention Area.

Legal Basis for High Seas Access

Indonesia's request for revising the high seas purse seine limit is supported by international legal instruments, including the United Nations Convention on the Law of the Sea (UNCLOS), the United Nations Fish Stocks Agreement (UNFSA), and the WCPFC Convention. Provisions within these agreements recognize and safeguard the rights and interests of developing coastal states in accessing and participating in high seas fisheries.

UNCLOS Articles:

- Article 87 establishes the freedom of fishing on the high seas but requires due regard for the interests of other states.
- Article 116 affirms the right of all states to engage in high seas fishing, provided they adhere to their treaty obligations and respect the rights of coastal states.

- Article 119 mandates that conservation measures should be designed based on scientific evidence, keeping in mind the special requirements of developing states.

These articles emphasize the importance of equitable opportunities for developing states to access fisheries resources and ensure they are not disadvantaged by conservation measures.

UNFSA Provisions:

The UNFSA, particularly Article 24, requires Regional Fisheries Management Organizations (RFMOs) to assist developing states in equitable participation in high seas fisheries. It stresses the importance of avoiding adverse impacts on developing states and preventing the undue transfer of conservation burdens to these states.

WCPFC Convention:

Article 10(3)(j) recognizes the fishing interests and aspirations of coastal states in whose areas of nation jurisdiction the stocks also occur.

The WCPFC Convention (Article 30) also recognizes the special requirements of developing states, highlighting the need for fair access and avoiding adverse impacts on their fisheries. It mandates the WCPFC to ensure that conservation measures provide equitable opportunities for developing states to expand and develop their fisheries sustainably.

Indonesia's proposal

Indonesia proposes to set a high seas purse seine effort limit as much as 1000 days based on:

- Indonesia participatory right in the WCPFC before 2013 as a cooperating non-member and the estimation of purse seine fishing effort in the high seas by SPC's paper in SC4 and CMM 2008-01.
- Purse seine fleet development plan in the High Seas of WCPO

Justification for Indonesia's Proposal

- a. Indonesia is a signatory to the WCPFC Convention and actively contributed to the establishment of this RFMO. In addition, Indonesia has reaffirmed its commitment by becoming a full member of the WCPFC in 2013.
- b. Implementation of Article 10 and 30 of the WCPFC Convention related to interest of the coastal states and special requirements for the developing states
- c. Indonesia's participatory rights for purse seine effort limit in the high seas started from 2008 up to 2013 as Cooperating Non-Member much as 500 fishing days. For 12 years, Indonesia has never utilized and obtain benefit from this purse-seine effort limit.
- d. Indonesia's fisheries sector is crucial to its national economy, supporting millions of livelihoods. Revising the high seas limit would provide Indonesia with opportunities for economic diversification and growth, allowing greater participation in the high seas fishery and empowering coastal communities and their livelihoods.
- e. The high seas purse seine fishing effort limit will be an integral part of the fleet development plan

in the high seas of the Western and Central Pacific Ocean (WCPO).

- f. Indonesia is committed to maintaining sustainable fisheries. Any increase in high seas purse seine activities would comply with WCPFC standards and guidelines, ensuring minimal environmental impact. Indonesia is also committed to implement robust monitoring, control, and surveillance measures to ensure compliance. Further, Indonesia is transforming into better data collection through the implementation of quota-based management policy, supported by integrated management system since 2023.
- g. Indonesia seeks a fairness to participate in the high seas fishery. The current zero-day limit restricts Indonesia's opportunity compared to other WCPFC members with current allocations. Adjusting the limit would align with the principles of fairness and equity outlined in Article 30 of the Convention and other international fisheries governance frameworks.
- h. Allowing Indonesia, a developing state, to use its rights for a high seas purse seine limit would also benefit the WCPFC scientific community, as Indonesia would be able to actively participate in providing operational data from fishing vessel operated in the high seas for the science work.
- i. Indonesia is committed to comply with the requirements related to the high seas fishing activities.

By agreeing to this proposal, Indonesia believes that the WCPFC promotes and demonstrates a greater regional cooperation, equity, and shared responsibility for sustainable fisheries management. Indonesia looks forward to constructive dialogue and collaboration with WCPFC members to realize a mutually beneficial outcome.

B. Consideration of CMM 2013-06

1. Who is required to implement the proposal?

Indonesia.

2. Which CCMs would this proposal impact and in what ways and what proportion?

This proposal may only impact to Indonesia.

3. Are there linkages with other proposals or instruments in other Regional Fisheries Management Organizations or international organizations that reduce the burden of implementation? *No.*

4. Does the proposal affect development opportunities of SIDS?

No.

5. Does the proposal affect SIDS domestic access to resources and development aspirations?

No.

6. What sources, including financial and human capacity, are needed by SIDS to implement the proposal?

No additional resources are required for SIDS to implement this proposal.

7. What mitigation measures are included in the proposal?

No mitigation measures are included.

8. What assistant mechanisms and associated timeframe, including training and financial support,

are included in the proposal to avoid a disproportionate burden on SIDS? *This proposal does not place a disproportionate burden on SIDs.*

C. Proposed Changes to CMM 2023-01

High seas purse seine effort control³

25. CCMs that are not SIDS shall restrict the level of purse seine effort on the high seas in the area 20oN to 20oS to the limits set out in Attachment 1, Table 2, except that the Philippines shall take measures on the high seas in accordance with Attachment 2.

Attachment 1

CCM	EFFORT LIMIT (DAYS)
CHINA	26
ECUADOR	**
EL SALVADOR	**
EUROPEAN UNION	403
INDONESIA	(0) 1.000
JAPAN	121
NEW ZEALAND	160
PHILIPPINES	#
REPUBLIC OF KOREA	207
CHINESE TAIPEI	95
USA	1270

** subject to CNM on participatory rights

The measures that the Philippines will take are in **Attachment 2.**

March 3, 2016

Saut Tampubolon
Deputy Director of Fish Resources Management
Directorate General of Capture Fisheries
Ministry of Marine Affairs and Fisheries
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Dear Saut Tampubolon,

I acknowledge receipt of your letter of March 1, 2016.

I can confirm that there are presently no requirements in any WCPFC conservation and management measures to apply a replacement scheme to Indonesia, prior to Indonesia constructing or purchasing a new purse seine vessel.

I hope that this advice serves your current purpose.

Yours sincerely,



Feleti P Teo, **OBE**
EXECUTIVE DIRECTOR