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

WCPFC22-2025-DP09
1 November 2025

Submitted by Indonesia

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 large purse seine vessels.

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 reinstate its high seas purse seine effort limit to exercise its recognized rights to fish within the high seas of the Convention Area, with an estimated effort level of approximately 500 fishing days, as previously acknowledged by the Commission.

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:

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 500 days based on:

- Estimation of purse seine fishing effort in the high seas by SPC's paper in SC4 and CMM 2008-01.
- Estimation on catch rate equivalent to the effort rate for the 3 (three) purse seiners in Indonesian EEZ during 2024 was around 450- 500 days.

Justification for Indonesia's Proposal

- 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.
- Indonesia is committed to maintaining sustainable fisheries. Any increase in high seas purse seine activities would comply with WCPFC guidelines, ensuring minimal environmental impact. Indonesia is also committed to implement robust monitoring, control, and surveillance measures to ensure compliance.
- Indonesia seeks a fair opportunity to participate in the high seas fishery. The current zero-day limit restricts Indonesia's competitiveness 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.
- Allowing Indonesia, a developing coastal 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.
- Indonesia is committed to comply with the requirements related to the high seas fishing activities (i.e. notify the Secretariat of WCPFC when the vessel about to enter the high seas, operating MTU VMS such as PTSOG Taiwan that compatible with the WCPFC MTU list, deploy an observer for each purse seiners fishing in the high seas, implement vessel marking following the WCPFC standard).

By agreeing to this proposal, the WCPFC can promote and demonstrate 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) 500
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**.



**MINISTRY OF MARINE AFFAIRS AND FISHERIES
DIRECTORATE GENERAL OF CAPTURE FISHERIES**

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B.3092/DJPT.2/PI.130/X/2025

October 30, 2025

Subject: 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)
Kaselehlie Street PO Box 2356, Kolonia, Pohnpei State, 96941,
Federated States of Micronesia

Dear Ms. Rhea Moss-Christian,

To follow up on the results of WCPFC21 regarding the 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, Indonesia would like to update our proposal for a revision on Attachment 1 (Table 2.) of the resolution regarding the high seas purse seine effort limit for Indonesia. The draft of the revised proposal 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 for Fish Resources Management,



**Ditandatangani
Secara Elektronik**

Syahril Abd Raup

Cc:

Director General of Capture Fisheries

March 3, 2016

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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