

**PAPER**  
**ON REVISING TAC ALLOCATION OF SOUTHERN BLUEFIN TUNA**  
**By Indonesia**

**1. Background**

According to the Report of the Thirtieth Annual Meeting of the Commission, paragraph 74, 75, 76 and 81, as follows:

***Allocation of the TAC***

74. The Chair noted that the TAC for 2024 to 2026 was to be determined at CCSBT 29, however, the decision was deferred to CCSBT 30. In addition, CCSBT 29 agreed that Indonesia would provide a proposal for revising the TAC allocation at CCSBT 30 for consideration by Members, and also noted that this proposal would be for a simple adjustment to the allocation percentages and not a proposal for a completely new mechanism.
75. Indonesia presented paper CCSBT-EC/2310/17, which proposes an increase to Indonesia's allocation. In its presentation, Indonesia emphasised its status as a developing coastal State with immediate access to SBT fishing grounds within its EEZ. Indonesia stated that it possessed a demonstrated ability for greater SBT catch but had been forced to limit its catch since joining this Commission. Indonesia also highlighted its efforts to develop monitoring systems, including the CDS, and contribution to the science process as evidence of its commitment to the management of the stock.
76. Several Members raised the concern over the limited time to fully assess the proposal from Indonesia and to give it due consideration including its potential impact on the allocation of other Members. Several Members also noted that many of the reasons that Indonesia put forward to support its request for an increase in its allocation percentage also applied to them, such as SBT being present in their EEZs, past higher historical catch, and socioeconomic impact.
81. Members expressed an openness to discussing a possible way forward to address the position that Indonesia is in, which may include a review of allocation percentages. It was suggested that long term arrangements could be considered next year providing a paper was put forward well in advance of the meeting (at least 60 days prior to the start of the meeting) to allow for consultations with stakeholders. It was noted that the next quota block would be the preferred timing for implementation of a change and that the earlier

discussions started the better. Early discussion would be important for a proposal to succeed.

## 2. Rationale

- Indonesia is a full member of the CCSBT and a developing coastal state;
- Overall current allocation distribution is not yet fully reflecting the situation and aspiration of developing coastal states with direct access to the resource (southern bluefin tuna);
- Dynamic of tuna fishing capacity of the member countries (Over-Catch/Under-Catch), in particular increased proportion of under catch in recent years;
- SBT has a significant multiplier effect on socio-economic impact to coastal communities and industries; and
- The CCSBT Performance Review Action Plan, PR2021-31: Review on the existing allocation mechanism to ensure that it reflects the current makeup of the Membership and principles of international law.

## 3. Current Allocation

Based on the Resolution on the Allocation of the Global Total Allowable Catch (updated at the Thirtieth Annual Meeting, 9-12 October 2023):

1. The total allowable catch (TAC) set on the basis of the Management Procedure (MP) shall be allocated among Members and Cooperating Non-Members according to this Resolution.
2. Unless this Resolution provides otherwise, the TAC shall be allocated among Members based on Members' Allocation Percentage levels set out in the Annex of this Resolution.
3. If there is no change to the TAC, each Member's allocation will remain unchanged.

Table 1. Annex. Members' Allocation Percentage

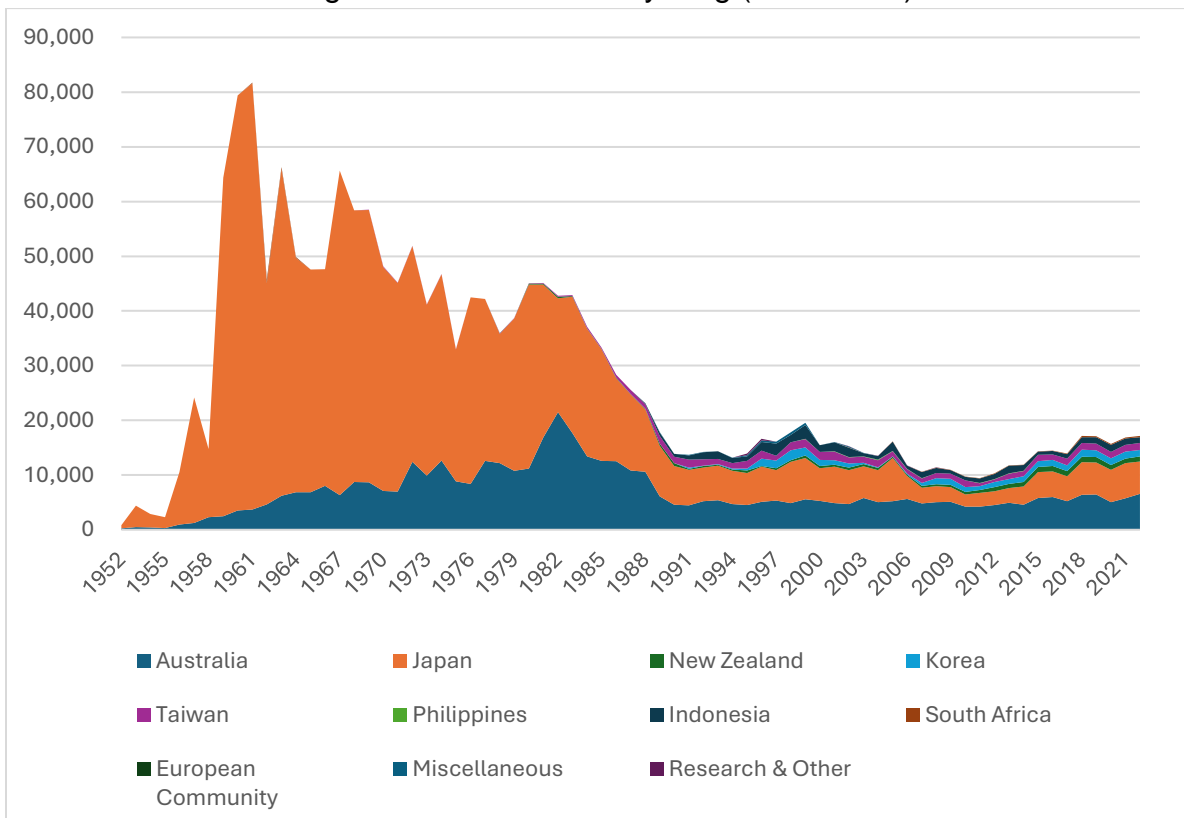
Member	Allocation Percentage
Japan	35.5643%
Australia	35.5643%
Republic of Korea	7.1568%
Fishing Entity of Taiwan	7.1568%
New Zealand	6.2779%
Indonesia	5.7785%
South Africa	2.4387%
European Union	0.0628%

The allocation percentage in Table 1 was agreed at CCSBT23 (2016). Refer to paragraph 58 on the Report of CCSBT23, that the allocation percentage will be duly adjusted once there is a new percentage in place.

#### 4. Historical Global Catch and Active Vessel

Historically, SBT stock has been caught in the highest amount just above 80,000 mt in 1961 and showed a decreasing trend to 40,000 mt in 1983. The catch further decrease to half of the level of catch 1983 in the following 5 years down to 20,000 mt in 1988. There were no records of SBT catch exceeding 20,000 mt after 1988 with Japan and Australia as the main harvesters (Figure 1). During the late 1980s, other countries started to join the fishery, such as Indonesia, and were recorded as catching very small amount of SBT while the stock status is under status of overfishing and overfished due to long term high level of fishing. Member of CCSBT, including Indonesia as a developing and coastal state, have been participating in the joint management under CCSBT supporting rebuilding stock measures for around 30 years with small proportion of SBT stocks after other five members.

Figure 1. Global Catch by Flag (1954-2022)



From 2002 until 2022, Japan and Australia had a portion of catch almost 6 times higher than Indonesia and other members (Figure 2). Meanwhile, the number of active fishing vessels for Japan and Australia tends to decline over time (Figure 3). The same situation also happens to Korea and Taiwan which both have increasing catch trends, while the number of active vessels for Korea remains relatively stable, but is declining for Taiwan. On the other hand, the number of active vessel for developing coastal

states (Indonesia) tends to increase over time, with result of increasing trends of catch under small catch allocation.

Particularly for Indonesia, it has a high number of active fishing vessels catching SBT with highest number of 189 unit in 2010. The number of active vessels declined during 2015-2017 when the moratorium for ex-foreign vessel was implemented, but it started to increase again since 2018 and reached 170 units in 2022. However, apart from the increasing number of active vessels, Indonesia's catch limit could not accommodate the potential capacity of its fishing fleet compared to other distant fishing nations. The fleets were forced to limit their optimum fishing capacity and that is considered as a challenge in considering the rights and interest of developing coastal state.

Figure 2. Global Catch by Flag (2002-2022)

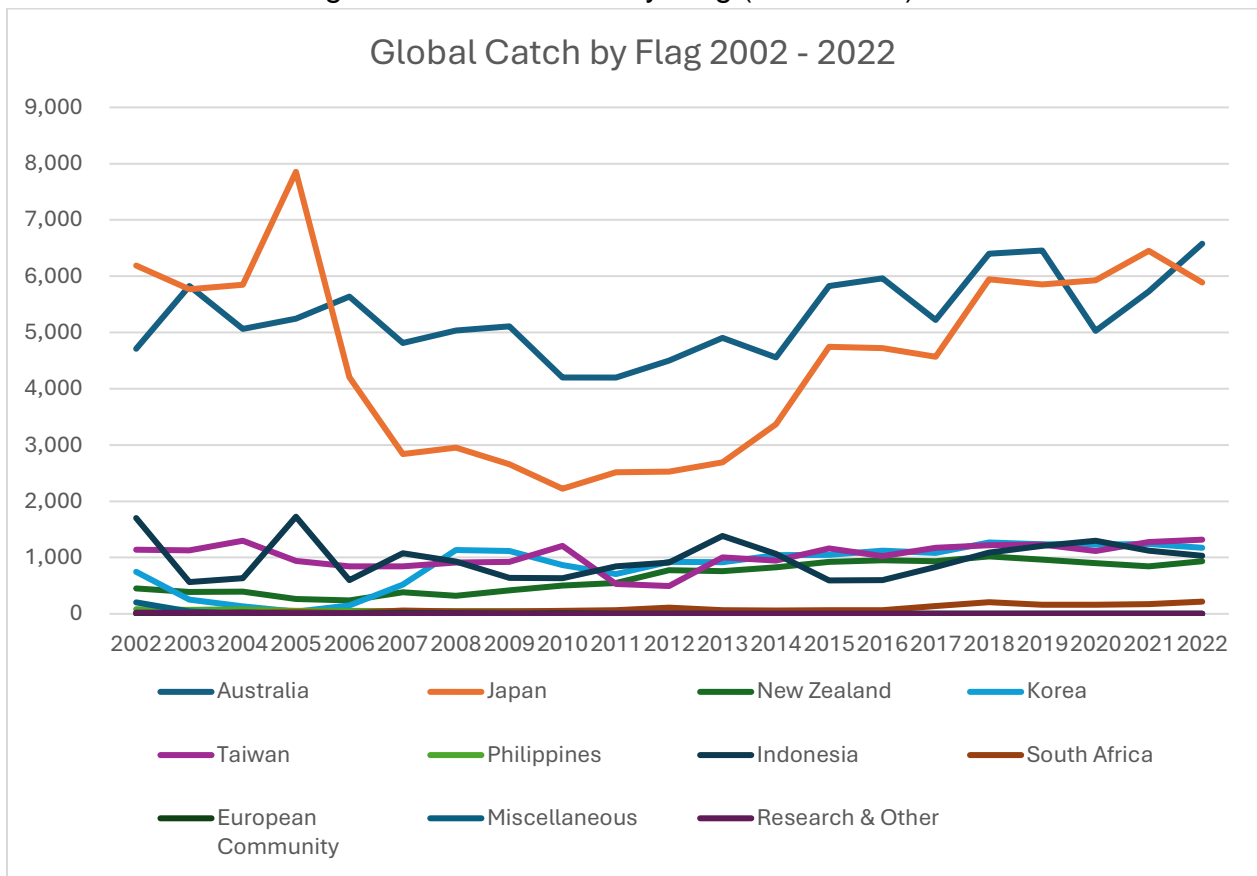
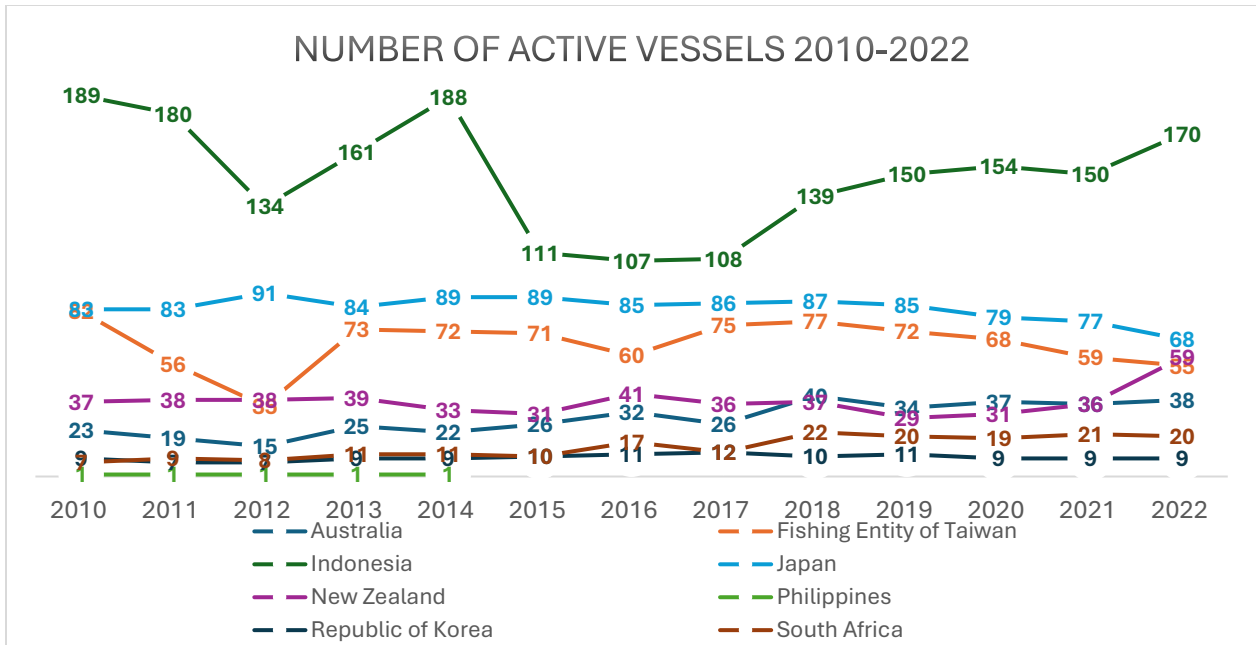


Figure 3. Number of Active Vessels (2010-2022)



## 5. Potential Capacity of Indonesian Fishing Fleet in Catching SBT

As a developing state with large number of small scale tuna vessel operating in the Indian Ocean facing great challenges to allocate SBT catch to those vessel under small TAC as illustrated in table 2.

Table 2. Number of Indonesian Active Vessel Caught SBT, whole weight estimation of TAC and average weight estimation of SBT allocation per vessel 2011-2023

Year	No. Active Vessel	Whole Weight Estimation (Kg)	Average Whole Weight Estimation per Vessel (Kg)
2011	185	842.397	4.553
2012	140	909.755	6.498
2013	158	1.382.646	8.751
2014	190	1.063.318	5.596
2015	112	592.949	5.294
2016	107	600.645	5.614
2017	109	834.622	7.657
2018	139	1.086.614	7.817
2019	150	1.206.034	8.040
2020	155	1.297.668	8.372
2021	149	1.122.715	7.535
2022	170	1.031.397	6.067
2023	235	1.031.345	4.389

Highest average whole weight estimation per vessel was 8.372 kg in 2020. Meanwhile, number of Indonesian fishing vessels registered in CCSBT RAV per July

2024 are 304 units. Therefore, Indonesian fishing vessels could potentially catch SBT as much as 2.545.104kg if using its optimum capacity.

## 6. Justification to increase Indonesia's allocation

Indonesia strongly believes its current allocation is not sufficient to meet its aspiration as a developing coastal state and there has been a long inequality in the allocation to Indonesia with justification as follows:

- a. Indonesia is **the only developing coastal state** whose exclusive economic or fishery zone is where the southern bluefin tuna are known to spawn and migrate. Indonesia, has fished for southern bluefin tuna for over three decades, as described in Attachment A of the Secretariat Review of Catches (CCSBT-ESC/2308/04Rev1). However, the allocation for Indonesia is less than developed coastal states like Australia and New Zealand, and even less compared with developed distant water fishing nations like Japan, Korea and Taiwan.
- b. Historically, prior to joining the CCSBT, Indonesia had a catch recorded in 1997 of 2,210t and 2,504t in 1999 and had to limit its catch to less than 1000t in 2007 and 1200t in recent years after became a member of CCSBT in 2007, while Taiwan and Korea have never caught beyond 2000t.
- c. Indonesian tuna long liners have the potential capacity to catch SBT to the level of 1999 catch history. Indonesia over-caught its TAC in 2019 by 181.92t and in 2020 by 457t. Despite its economic problems during the covid pandemic, respectful to the principle of conservation measures for rebuilding stock of SBT, Indonesia agreed to a payback plan for its over-catch in 2020 and to pay back 91.3 t of 457 t over-catch each year from 2022 to 2026 inclusive. Indonesia also provided a plan to CCSBT<sup>27</sup> to ensure its catch in 2021 is within its allocation of the TAC.
- d. By July 2024, there are 304 Indonesian vessels registered with CCSBT. By using an average productivity of SBT catch around 8.372 kg per unit vessel, Indonesian fishing fleet has a potential to catch around 2.545.104kg of SBT annually. This amount is significantly higher than the current quota for Indonesia under current percentage.
- e. Indonesia has been fully engaged in the process of rebuilding the southern bluefin tuna stock and its management in CCSBT. Indonesia has been putting its best effort to limit the catch of SBT under the allocation scheme to rebuild the stock at a sustainable level.
- f. Indonesia has several monitoring and controlling system through CDS application and early warning system.
- g. Indonesia welcome any collaboration with members including discussions on improving responsible fisheries practices, improve quality, market and product traceability.

- h. Indonesia also has been putting its best effort to comply with the CCSBT data exchange requirements and engage in the scientific work by cooperating with CSIRO in conducting data collection of SPR data for stock assessment.
- i. Recalling Article 8 of the Convention in paragraph 4, in deciding upon allocations among the Parties, the Commission shall consider:
  - (a) Relevant scientific evidence;
  - (b) the need for orderly and sustainable development of southern bluefin tuna fisheries;
  - (c) the interests of Parties through whose exclusive economic or fishery zones southern bluefin tuna migrates;
  - (d) the interests of Parties whose vessels engage in fishing for southern bluefin tuna including those which have historically engaged in such fishing and those which have southern bluefin tuna fisheries under development;
  - (e) the contribution of each Party to conservation and enhancement of, and scientific research on, southern bluefin tuna;
  - (f) any other factors which the Commission deems appropriate.
- j. In recent years, the Indonesian longline vessels shifted their fishing ground to the high seas of the Indian Ocean (CCSBT statistical area 2) (CCSBT-ESC/2308/SBT Fisheries – Indonesia (Rev.1)).
- k. The multiplier effect of SBT fisheries in Indonesia for socio-economic of coastal community and industry (fishers, fishing crews and fish processing workers) that depend on the fishery.
- l. The 2021 CCSBT Performance Review conclusion on the CCSBT's performance status which had remained challenging in certain areas, such as special requirements of developing states which has not yet been addressed. Key challenges for the CCSBT includes balancing the competing demands of those who harvest SBT against the biological demands of stock rebuilding (TAC setting and allocation). Under the Strategy and Fisheries Management Working Group Process, Members agreed on an Action Plan to address recommendations, especially those having been deemed of the highest priority. This report also has not been thoroughly followed up to review the existing allocation mechanism.
- m. Based on the report of the Strategy and Fisheries Management Working Group (CCSBT-EC/2310/09), under the goal (B) Operation/Administration of the Commission and Secretariat, PR2021-31: Review on the existing allocation mechanism to ensure that it reflects the current makeup of the Membership and principles of international law is considered as a high priority and the Commission/EC responsibility that falls between short term (2025) and medium term (2026).
- n. Indonesia proposes that CCSBT reform and reformulate its TAC distribution to be more fair, equitable, and participatory. Furthermore, Indonesia proposes that

CCSBT also acknowledges the nature of respective fishing practices, i.e. small scale fisheries, so that the distribution of TAC not only benefits developed countries but also coastal developing countries.

## 7. Proposed Allocation Criteria

Determining of TAC in the past has yet to follow the consideration of TAC criteria in text of convention with a fair and proper calculation. For example, it is obvious if historical catch remain has high weighing, logically the main harvesters continually get the highest proportion, while actually the main harvester with long term highest catch shall responsible for the unhealthy stock status of SBT. In addition, current conditions have substantially changed and the coastal developing states have increased the capacity and capability of their fishing vessel and need more opportunity and space to harvest the resources in a fairer way.

Based on the text of the Convention, Article 8, Paragraph 4(f), the Commission may consider any other factors which are deemed appropriate. This proposal considers the criteria in Article 8, Paragraph 4 and also propose additional new criteria which is "active current vessel fleet".

Explanation on elements for each allocation criteria as follows:

(a) relevant scientific evidence.

*This criteria will be weighted by two options, 0% or 5% of total proportion of criteria and allocated equally to each members.*

(b) the need for orderly and sustainable development of southern bluefin tuna fisheries.

*This criteria will be weighted by 5% of total proportion of criteria and allocated proportionally based on the development status of the members. Developing state will be weighted by 20% and developed state will be weighted by 10% of total proportion of members.*

(c) the interest of Parties through whose exclusive economic or fishery zones southern bluefin tuna migrates.

*This criteria will be weighted by three options, which are 20%, 30% and 40% of total proportion of criteria and allocated proportionally based on for example the size of EEZ where the southern bluefin tuna migrates. Weighting factor also used between coastal states.*

(d) the interest of Parties whose vessels engage in fishing for southern bluefin tuna including those which have historically engaged in such fishing and those which have southern bluefin tuna fisheries under development.

*This criteria will be weighted by three options, which are 40%, 50% and 60% of total proportion of criteria and allocated proportionally based on the average of historical catch with two options: 20 years between 2003-2022 of each members and 5 recent years for example 2018-2022.*



(e) the contribution of each Party to conservation and enhancement of, and scientific research on southern bluefin tuna.

*This criteria will be weighted by 5% of total proportion of criteria and allocated proportionally based on active participation on meetings held by CCSBT, submission on annual report either compliance or scientific, and participation on the scientific work (Annex 1).*

(f) any other factors which the Commission deems appropriate: active current vessel fleet.

*This criteria will be weighted by two option, which are 0% and 5% of total proportion of criteria and allocated proportionally based on number active vessels of current members in 2022 (Annex 2).*

Percentage weighting options of each allocation criteria is shown in the following Table 3.

**Table 3. Percentage weighting of allocation criteria**

No	Allocation Criteria	Percentage Weighting (Options)
1	Relevant scientific evidence	No weighting to 5%
2	The need for orderly and sustainable development of southern bluefin tuna fisheries	5%
3	The interest of Parties through whose exclusive economic or fishery zones southern bluefin tuna migrates	20% - 40%
4	The interest of Parties whose vessels engage in fishing for southern bluefin tuna including those which have historically engaged in such fishing and those which have southern bluefin tuna fisheries under development	40% - 60%
5	The contribution of each Party to conservation and enhancement of, and scientific research on southern bluefin tuna	No weighting to 5%
6	Any other factors which the Commission deems appropriate: active current vessel fleet	No weighting to 5%

The percentage weighting of allocation criteria for each members are shown in two tables to display two options of allocation criteria number 4 in Table 3, which are 1) Option 1 by historical catch of 20 years between 2003-2022 (Table 4), and 2) Option 2 by historical catch of 5 recent years between 2018-2022 (Table 5).

**Table 4. Option 1. Percentage weighting of allocation criteria for each members by historical catch of 20 years between 2003-2022**

No	Allocation Criteria	JP	AU	NZ	TW	KR	ID	SA	EU	TOTAL
1	Relevant scientific evidence	12,5%	12,5%	12,5%	12,5%	12,5%	12,5%	12,5%	12,5%	100%
2	The need for orderly and sustainable development of southern bluefin tuna fisheries	10%	10%	10%	10%	10%	20%	20%	10%	100%
3	The interest of Parties through whose exclusive economic or fishery zones southern bluefin tuna migrates	0%	30%	27,5%	0%	0%	27,5%	15%	0%	100%
4	<i>The interest of Parties whose vessels engage in fishing for southern bluefin tuna including those which have historically engaged in such fishing and those which have southern bluefin tuna fisheries under development</i>	33,48%	39,73%	4,97%	7,69%	6,43%	7,02%	0,66%	0,03%	100%
5	The contribution of each Party to conservation and enhancement of, and scientific research on southern bluefin tuna	18,18%	18,18%	18,18%	13,64%	13,64%	13,64%	4,54%	0%	100%
6	Any other factors which the Commission deems appropriate: active current vessel fleet	16,23%	9,07%	14,08%	13,13%	2,15%	40,57%	4,77%	0%	100%

**Table 5. Option 2. Percentage weighting of allocation criteria for each members by historical catch of 5 recent years between 2018-2022**

<b>No</b>	<b>Allocation Criteria</b>	<b>JP</b>	<b>AU</b>	<b>NZ</b>	<b>TW</b>	<b>KR</b>	<b>ID</b>	<b>SA</b>	<b>EU</b>	<b>TOTAL</b>
1	Relevant scientific evidence	12,5%	12,5%	12,5%	12,5%	12,5%	12,5%	12,5%	12,5%	100%
2	The need for orderly and sustainable development of southern bluefin tuna fisheries	10%	10%	10%	10%	10%	20%	20%	10%	100%
3	The interest of Parties through whose exclusive economic or fishery zones southern bluefin tuna migrates	0%	30%	27,5%	0%	0%	27,5%	15%	0%	100%
4	<i>The interest of Parties whose vessels engage in fishing for southern bluefin tuna including those which have historically engaged in such fishing and those which have southern bluefin tuna fisheries under development</i>	35,84%	35,99%	5,56%	7,34%	7,33%	6,85%	1,10%	0%	100%
5	The contribution of each Party to conservation and enhancement of, and scientific research on southern bluefin tuna	18,18%	18,18%	18,18%	13,64%	13,64%	13,64%	4,54%	0%	100%
6	Any other factors which the Commission deems appropriate: active current vessel fleet	16,23%	9,07%	14,08%	13,13%	2,15%	40,57%	4,77%	0%	100%

## **8. Cooperating Non-Member**

The allocation for a Cooperating Non-Member (CNM) at the annual meeting where its status as a CNM is agreed in accordance with the Resolution to Establish the Status of Cooperating Non-Member of the Extended Commission and the Extended Scientific Committee, taking into account such elements as its potential SBT fishing capacity, its monitoring, control, and surveillance capacity, its administrative mechanisms to implement its CCSBT obligations, its past record of SBT fishing and management, and its need for SBT catch. The allocation is subject to the annual review of its status as a CNM, and a possible decrease if there is a decrease of TAC.

## **9. New Member**

The allocation for a New Member at the first annual meeting after it becomes a Member in accordance with the Resolution to Establish an Extended Commission and an Extended Scientific Committee, taking into account such elements as its potential SBT fishing capacity, its monitoring, control and surveillance capacity, its administrative mechanisms to implement its CCSBT obligations, its past records of SBT fishing and management, and its need for SBT catch. The allocation shall be no more than a maximum of 0.355% of the TAC of the year of the annual meeting during the first three fishing seasons unless the Extended Commission decides otherwise, including a possible decrease if there is a decrease of TAC.

## **10. Research Mortality Allowance**

An amount of the TAC can be set aside for Research Mortality Allowance based on the advice provided by the Extended Scientific Committee and decision of Extended Commission.

## **11. Transfer Allocation**

A transfer mechanism may be considered by transfer any portion of its allocation to foreign fishing fleets in waters under its jurisdiction.

## **12. A New Allocation**

New Allocation shall be applied based on the agreed calculation of percentage weighting of allocation criteria on the next quota block year 2027-2029.

**Annex 1. Average historical catch data *and percentage each members***

Members	Average catch data 2003-2022		Average catch data 2018-2022	
	Ton	%	Ton	%
Australia	5314	39,73	6038	35,99
Fishing Entity of Taiwan	1029	7,69	1231	7,34
Indonesia	939	7,02	1149	6,85
Japan	4478	33,48	6013	35,84
New Zealand	664	4,97	933	5,56
Republic of Korea	860	6,43	1230	7,33
South Africa	88	0,66	184	1,10
European Union	4	0,03	0	0
Total	13276	100	16778	100

**Annex 2. Proportion on the contribution of each Party to conservation and enhancement of, and scientific research on southern bluefin tuna**

<b>Members</b>	<b>Participation in meetings</b>	<b>Annual Report</b>	<b>Participation in Scientific Work</b>	<b>Total</b>	<b>Proportion of Total</b>
Australia	1	1	2	4	18,18
Fishing Entity of Taiwan	1	1	1	3	13,64
Indonesia	1	1	1	3	13,64
Japan	1	1	2	4	18,18
New Zealand	1	1	2	4	18,18
Republic of Korea	1	1	1	3	13,64
South Africa	1	0	0	1	4,55
European Union	0	0	0	0	0,00
<b>Total</b>	<b>7</b>	<b>6</b>	<b>9</b>	<b>22</b>	<b>100,00</b>

**Annex 3. Proportion on active current vessel fleet of members in 2022.**

<b>Members</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Proportion (%) 2022</b>
Australia	40	34	37	36	38	<b>9,07</b>
Fishing Entity of Taiwan	77	72	68	59	55	<b>13,13</b>
Indonesia	139	150	154	150	170	<b>40,57</b>
Japan	87	85	79	77	68	<b>16,23</b>
New Zealand	37	29	31	36	59	<b>14,08</b>
Republic of Korea	10	11	9	9	9	<b>2,15</b>
South Africa	22	20	19	21	20	<b>4,77</b>
European Union	-	-	-	-	-	<b>0</b>
<b>Grand Total</b>	<b>412</b>	<b>401</b>	<b>397</b>	<b>388</b>	<b>419</b>	<b>100,00</b>