

Echebastar Indian Ocean Skipjack Tuna Purse Seine Fishery

Strategic Approach to Meeting the Conditions to MSC Certification & Strengthening the Sustainability Credentials of the Fishery

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1. Introduction

In November 2018, the Echebastar purse seine fishery for skipjack in the Indian Ocean was certified against the MSC Standard. The continued certification of the fishery for the initial 5-year period is contingent on Echebastar meeting the eight conditions to certification related to the performance indicators (PIs) that did not to meet the Standard (i.e. they scored between 60 and 79). Echebastar is required to ensure that the fishery meets the minimum score of 80 for each of these within the defined time periods.

Accordingly, the main purpose of the Strategy is to define the approach to meeting the conditions; identifying covering required results, objectives, phasing and responsibilities.

A second purpose is to define a Strategy to strengthen Echebastar's sustainability credentials and lead efforts to reduce the risk of the purse seine FAD fishery negatively impacting other elements of the ecosystem. Echebastar wishes to inform stakeholder understanding of the real impacts of FAD fishing while preparing to take the cumulative impacts¹ of <u>all</u> MSC certified fisheries in the Indian Ocean should other Indian Ocean FAD fisheries be certified.

The Strategy aims to respond to legitimate stakeholder concerns expressed during the assessment process, even when these are not relevant to a Condition.

The approach to implementing the Strategy will track the progress towards completing the defined activities and achieving the required results. At the same time, the Conditions cover a wide range of subjects and it is impracticable for Echebastar to assume total responsibility for the implementation of the WP. Accordingly, Echebastar will work with a range of other stakeholders to implement the Strategy. Each stakeholder should be formally approached to seek their support in relevant activities.

Further, the Strategy is designed to complement, influence and inform existing activities rather than replicate them or apply a contrary position. For example, the Strategy considers the on-going FIP, the fishery management planning process in the Seychelles, the design and implementation of bio-degradable DFADs, projects to recover lost and derelict DFADs and increased transparency of direct agreements between fishing companies and individual coastal states.

2. The Fisheries Improvement Project

The objective of the FIP (SIOTI — Sustainable Indian Ocean Tuna Initiative) (https://fisheryprogress.org/fip-profile/indian-ocean-tuna-purse-seine-sioti) is to improve the sustainable credentials of the purse seine fishery based in the Seychelles to a point where it may achieve MSC certification by March 2022. As such there is a strong basis for cooperation between FIP and Echebastar.

All of the requirements for cumulative impacts for species are applicable to their respective Outcome Pls. For habitats, in contrast, cumulative impacts are evaluated in the management Pl (2.4.2). The requirements here aim to ensure that vulnerable marine ecosystems (VMEs) are managed such that the impact of all MSC UoAs does not cause serious and irreversible harm to VMEs.

¹ For P2 primary species, teams need to evaluate whether the cumulative impact of overlapping MSC UoAs hinders the recovery of 'main' primary species. For secondary species, cumulative impacts only need to be considered in cases where two or more UoAs have 'main' catches that are 'considerable', defined as a species being 10% or more or the total catch. For ETP species, the combined impacts of MSC UoAs needs to be evaluated, but only in cases where either national and/or international requirements set catch limits for ETP species.

A comparison of the estimated outcomes for the FIP fishery and the scores achieved by Echebastar are shown in Table 1.² There should be an analysis of how the FIP may be modified in the light of the MSC certification of the Echebastar fishery.

Detail on the FIP defined activities are included in relation to the individual Conditions (see below). However, as an introduction the following points are relevant.

- The preliminary scoring of the FIP fishery estimated that 11 PIs would achieve a score of 60 to 79.9 and 4 PIs that would fail to achieve the minimum score of 60.
- **Principle 1**. As the stock status for skipjack (PI 1.1.1) achieves a score of 80; the FIP is mistaken in scoring PI 1.1.2 (Rebuilding strategy).

The Echebastar fishery met the 5 relevant P1 PIs at SG 80. In contrast, the FIP concluded that PI 1.2.1 would fail to meet the MSC standard (<60) while PI 1.2.3 would achieve 60-75 (pass with condition).

The initial 1.2.1 rational (FIP 2015) concluded that there was no clearly defined HCR and IOTC did not have Conservation and Management Measures in place.

The 2018 FIP up-date does not provide a rationale for PI 1.2.1 not meeting SG60. In contrast, the MSC assessments of the Maldives and Echebastar fisheries scored this PI at 85. Given the rigorous analysis completed under the MSC process, including substantial peer and stakeholder review, it is concluded that the Echebastar should not directly consider this PI. At the same time, it is recognised that part of the annual surveillance audit includes a review of stock status, and any change in the condition of the skipjack stock could lead to a rescoring of some of the P1 PIs. Accordingly, accordingly Echebastar will permanently monitor the status of the skipjack stock as contained in IOTC reports.

It is unclear why the FIP score for PI 1.2.3 was reduced between the initial pre-assessment and the subsequent scoping document and consequent first year progress report. The issue appears to be the lack of information of skipjack removals by other fishers i.e. Slc. This contrasts to that of the MSC assessments in Maldives and Echebastar that scored PI 1.2.3 at 90. SIc met the sole SG (SG 80): "The stock assessment splits removals in to three industrial fleets, all with good quality information on removals, as well as size and effort data: i) Maldives pole and line, ii) FAD purse seine, and iii) FSC purse seine (where the UoA is a subset of ii and iii). It additionally includes all other removals as a single fleet, using data supplied by members with estimates and adjustments as necessary made by the secretariat. Overall, while there are known problems with some of the artisanal fishery reporting, the quality of information on non-UoA removals is considered sufficiently good for stock assessment purposes and hence to inform management". Given the rigorous analysis completed under the MSC process, including substantial peer and stakeholder review, it is concluded that Echebastar will not consider this PI. At the same time, it would prove useful if data from small scale fleets were more certain, and the Echebastar will maintain a watching brief on this situation and react as appropriate.

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² Note that the scenario FAD skipjack fishery is used as the point of reference throughout this WP.

<u>Table 1: Indian Ocean Purse Seine FAD Fishery for Skipjack: Results of PA 2015 & FIP 2018 Compared to Echebastar</u>

Р	С	PI	PA201	FIP201	ECH
			5	8	E
1	Outcome	1.1.1 Stock status	100	≥80	100
		1.1.2 Stock rebuilding	75	≥80	
	Management	1.2.1 Harvest Strategy	<60	<60	85
		1.2.2 Harvest control rules and tools	<60	≥80	80
		1.2.3 Information and monitoring	80	60-79	90
		1.2.4 Assessment of stock status	80	≥80	85
2	Primary	2.1.1 Outcome	100	≥80	90
	species	2.1.2 Management	80	≥80	85
		2.1.3 Information	60	60-79	95
	Secondary	2.2.1 Outcome	<60	<60	80
	species	2.2.2 Management	<60	<60	85
		2.2.3 Information	60	60-79	85
	ETP species	2.3.1 Outcome	80	≥80	80
		2.3.2 Management	90	≥80	85
		2.3.3 Information	70	60-79	70
	Habitats	2.4.1 Outcome	60	60-79	70
		2.4.2 Management	70	60-79	75
		2.4.3 Information	70	60-79	75
	Ecosystem	2.5.1 Outcome	60	60-79	80
		2.5.2 Management	<60	<60	80
		2.5.3 Information	60	60-79	75
3	Governance	3.1.1 Legal and customary framework	60-79	60-79	80
	and Policy	3.1.2 Consultation, roles and responsibilities	≥80	≥80	75
		3.1.3 Long term objectives	≥80	≥80	100
	Fishery	3.2.1 Fishery specific objectives	≥80	≥80	75
	specific	3.2.2 Decision making processes	≥80	≥80	75
	management	3.2.3 Compliance and enforcement	60-79	60-79	85
	system	3.2.4 Management performance evaluation	≥80	≥80	80
Total	number of PIs eq	ual to or greater than 80	12	13	19
Total	number of PIs 60	10	11	8	
Total	number of PIs les	4	4	0	
Total	number of PIs N/	0	0	1	
Total	% of PIs equal to		46.4%	68%	
Total	% of PIs 60-79		39.3%	29%	
Total	%of PIs less than		14.3%	0%	
Total	% N/A		0.0%	3%	

• **Principle 2**. The Echebastar fishery achieved a score of 60<80 for PIs 2.3.3, 2.4.1, 2.4.2, 2.4.3 and 2.5.3. The FIP fishery came to the same conclusion for those five PIs. In addition, the FIP concluded that PIs 2.1.3, 2.2.3 and 2.5.1 would achieve a score of 60<80, while PIs 2.2.1, 2.2.2, and 2.5.2 would fail to meet the MSC minimum score of 60.

PI 2.1.3. The PA concluded that "Data on the catch of non-target species is currently collected but is yet to be analysed". The Echebastar fishery scored 85: data provided by AZTI through

the client was found to respond to the needs of the MSC standard. This example illustrates the difficulty in applying the MSC standard to a group of potential fishery clients as the situation may well vary between the different companies. Echebastar will: (I) ensure the quality and quantity of available data and its analysis on a regular basis; and (ii) respond to any issues that may arise.

PI 2.2.1. The FIP scoping document identifies silky shark as a "key" main species, and "other" main species as blue marlin, rainbow runner & dolphinfish.³ Under the MSC approach, silky shark is considered an ETP species and it is covered by Component 2.3. No other main secondary species were identified for the Echebastar fishery; the species identified by the FIP were considered as minor secondary species. Over the period of MSC certification, Echebastar will continually review its catch and landing data to identify if the situation with any species changes to the extent that they must be considered as "main" secondary species.

PI 2.2.2. A concern of the FIP is the lack of a risk-based analysis to indicate the potential for shark finning in the fishery (SId). As the Echebastar fishery met SId SG80 Sid this issue is not a factor in considering the sustainability credentials of the fishery according to the MSC standard. At the same time, a number of stakeholders questioned the potential for shark finning on the Echebastar vessels. On that basis, and to be proactive, Echebastar will prepare a written manual on the handling of sharks that are caught and provide the safeguards and checks needed to provide evidence that shark finning does not take place on Echebastar vessels.

PI 2.2.3. The FIP concern reflects the conclusion on PI 2.1.3. Echebastar is aware of the need to ensure: (I) the quality and quantity of available data; (ii) that this is analysed on a regular basis; and (iii) the company respond sto any issues that may arise.

PI 2.3.3. Both the FIP and the Echebastar assessment conclude that the fishery does not meet the MSC standard at SG80. The FIP scoping document identified two requirements: Action 1: Quantify the level of post-release mortality and the consequence for the status of ETP species. Action 2: Ensure that information is adequate to measure trends and support a strategy to manage impacts on ETP species. The weakness identified by the Echebastar assessment was that information was not adequate to measure trends and support a strategy to manage impacts on ETP species. Echebastar will ensure that data on interactions of its vessels with ETP species will be collected to provide a time series of data to identify trends and support any required changes to the management approach.

Echebastar recognises that fishery related mortality of silky sharks is a concern to stakeholders, and will place special attention on identifying the nature of this and any implications for the population of Indian Ocean silky shark. Echebastar will follow the FIP Action Plan requirement for silky shark and develop a specific management plan for silky shark that addresses data deficiencies and defines a strategy to ensure no hindrance to the recovery of this species with the implementation of required management measures to address the bycatch of silky shark including a vessel-based CoP.

Pls 2.4.1, 2.4.2 and 2.4.3. This component of the MSC standard is one of the main issues in considering the sustainability credentials of the dFAD fishery, with concern of the potential impact of lost FADs when they become derelict on coral reefs.

The FIP preassessment concluded:

There are no commonly encountered or vulnerable marine ecosystems (VMEs) that might be directly impacted by FAD-associated school sets. However there is some

³ The distinction between "key": and "other" does not apply in the MSC standard; the distinction is between "main" and "minor" which largely depends on catch share and vulnerability.

indirect impact through the beaching of abandoned, lost and otherwise discarded FADs on coral reefs, although it is to unlikely to reduce structure and function of these VME habitats to a point where there would be serious or irreversible harm.

Whilst there is some regional IOTC measures (e.g. FAD limits) and fleet measures (e.g. tracking and recovery of FADs), there is still a significant loss rate with no strategy to address this.

Whilst the distribution of habitats and VMEs in the Western Indian Ocean is well known, there is limited information on the spatial extent of interaction and on the timing and location of FAD beaching.

This led to the definition of three actions.

Action 1. Ensure accountability and tracking of all drifting FADs to assist their responsible management and decommissioning.

Action 2. FIP participants develop a strategy to ensure FADs are under control at all times

Action 3: Study of FAD management (inc. decommissioning and recovery of lost FADs) in the Indian Ocean and the effectiveness of recent management measures to reduce habitat damage.

The most recent FIP progress report (2018) noted that no actions had been taken to implement the defined activities.

The failure of the Echebastar fishery to achieve 80 for each of the three PIs led to the setting of Conditions 2, 3 and 4 and Recommendation 3 (Echebastar maintains a database of the number of lost FADs by area and date).

• Pls 2.5.1, 2.5.2, 2.5.3.

The FIP pre-assessment found:

- 2.5.1 "Whilst there is no strong evidence of recruitment over-fishing linked to FAD use, the ecosystem impact of the extensive and increasing use of FADs is still largely unknown and it cannot be stated with any certainty that it is highly likely that UoA will not disrupt the key elements underlying ecosystem structure and function to a point where there would be a serious or irreversible harm".
- 2.5.2 There are currently some measures in place to take into account the potential impacts of the UoA on key elements of the ecosystem, but they are unlikely to work if fishing effort continues to expand unchecked.
- 2.5.3 Whilst there is some information on the key elements of the ecosystem, the main impacts the UoA on these key ecosystem elements can be inferred from existing information, but have not been investigated in detail.

These findings were reflected in the defined actions and milestones in the 2017 Scoping document; PI 2.5.1 Sia "Risk assessment of the use of FADs and their possible impact on target species stock structure and the key elements underlying ecosystem structure and function".

Concern about the impact of FADs on ecosystems is common throughout the oceans and Echebastar should consider information on a global basis.

It is important: (i) to differentiate actions by PI i.e. outcome, management and information; and (ii) to ensure that defined milestones are attainable. As an example of the latter point; given the nature of the issue it may be considered that the Year 5 milestone for 2.5.2 Sib i.e.

"An independent evaluation provides objective evidence that the ecosystem-based management strategy is working" is overly ambitious.

Echebastar will examine the FIP action plan and recommend amendments.

As with some other P2 components, the Echebastar fishery performed better in the MSC assessment that would have been thought in relation to the pre-assessment. This is due to the to the scoring of Component 2.5 to be UoA specific. The only scoring issues that failed to achieve 80 were: PI 2.5.3 Sib (*Main impacts of the UoA on these key ecosystem elements can be inferred from existing information, and some have been investigated in detail*) and Sid (*Adequate information is available on the impacts of the UoA on these components to allow some of the main consequences for the ecosystem to be inferred*).

- **Principle 3**. The Echebastar fishery did not achieve a score of 80 for PIs 3.1.2, 3.2.1 and 3.2.2. In contrast, the FIP fishery achieved an estimated score of 60<80 for PIs 3.1.1 and 3.2.3.
 - **PI 3.1.1.** In concluding that the fishery did not meet PI 3.1.1 SG80, the PA concluded that a "framework for cooperating is in place through existence of IOTC and related Resolutions, but many CPCs have not translated legal framework into national legislative framework suggesting that such cooperation is not always effective for management. Transparent mechanisms in place for dispute resolution but not tested or proven at regional level. Functioning of IOTC ensure respect for customary rights".

The 2018 FIP progress report notes that no activity had taken place to implement the defined "Action 1: Review to determine the extent and effectiveness of national legislation of IOTC CPCs in delivering management outcomes consistent with MSC Principles 1 & 2".

In contrast to the PA and FIP, the Echebastar assessment concentrated on the key jurisdictions i.e. IOTC, EU and Seychelles. As such, the situation in other CPCs was not considered relevant.

PI 3.1.2. The PA / FIP analysis in relation to PI 3.1.2 was general to all CPCs in concluding "roles and responsibilities well defined and understood and IOTC consultation processes regularly seek and accept relevant information. Consultation processes provide opportunity for involvement but there are human and financial capacity constraints often on full participation by all parties".

The issue identified by the Echebastar assessment related specifically to the Seychelles. The rational for PI3.1.2 Sib failing to meet SG80 was that it was not clear how the views of local stakeholders in the Seychelles were considered. There is a consequent condition.

Given the need for harmonisation in any assessments, and given that it relates to a Seychelles based fishery, Echebastar recommends that the FIP review its conclusions in relation to PI 3.1.2

PI 3.2.1. The PA conclusion that "Specific objectives provided in pre-amble texts to Resolutions agreeing actions as part of CMMs and are therefore explicit. But not collated into one fishery management plan document or logically linked to measurable indicators" does not appear to consider that Component 3.2 is fishery specific and should refer to the tuna purse seine fishery with FADs considering the three key jurisdictions i.e. IOTC, EU and Seychelles.

In contrast, the Echebastar assessment considers that the absence of defined short- and long-term objectives in in the Seychelles management of tuna fisheries meant that Echebastar was unable to meet PI 3.2.1 SG80.

Given the need for harmonisation of assessments and that it relates to a Seychelles based fishery, Echebastar recommends that the FIP review its conclusions in relation to PI 3.2.1

PI 3.2.2. As above the PA conclusion that "The management system pro-actively avoids disputes and there is formal and transparent reporting on management performance,

management decisions and actions. But the established decision-making processes don't always result in necessary action" does not appear to consider that Component 3.2 is fishery specific.

As the fishery was considered to meet SG80, it is unclear why PI 3.2.2 is covered by the FIP. However, the error is corrected in the FIP progress report (2018).

The concern of the auditors in the Echebastar assessment related to the lack of transparency of private agreements. Given the need for harmonisation pf assessments, and that it relates to a Seychelles based fishery, Echebastar recommends that the FIP review its conclusions in relation to PI 3.2.2.

PI 3.2.3. In concluding that the fishery failed to meet PI 3.2.3 at SG80, the PA found "MCS mechanisms are in place but there is no one regional system ensuring comprehensive MCS across the whole fishery. Views on appropriate sanctions differ and again there is no one system applying. Some information on compliance is provided and while there is no systematic evidence of non-compliance there are nevertheless serious concerns about compliance in the fishery as a whole".

The FIP progress report (2018) identifies three actions that are relevant to IOTC

Action 1: IOTC considers proposals to strengthen compliance by commencing development of possible sanctions for instance where members repeatedly fall short in complying with IOTC management measures

Action 2: IOTC has recommended a process to (i) develop sanctions and (ii) provide more in depth and critical reporting of non-compliance.

Action 13c: IOTC adopts sanctions for non-compliance and makes public an in-depth summary of all non-compliance.

The 2018 progress report concludes that the FIP is behind target as a strategy has not been agreed.

3. <u>Echebastar Actions by Performance Indicator</u>

PI	ACTION
1.1.1	Periodic review of skipjack stock status to confirm that it continues to meet SG80.
1.1.2	In the event that PI 1.1.1 fails to score 80, Echebastar will consider the implications for PI 1.1.2 (noting there is a one-year grace period to implement a rebuilding plan).
1.2.1	Recommendation 1: Observers estimate and report on discarded catch and reasons for discarding.
	This relates specifically to skipjack. Echebastar will confirm the current situation and introduce any required changes.
1.2.2	Echebastar will monitor the situation on HCR and HCT and review any comments made by ENGOs.
1.2.3	Echebastar will monitor the situation data available from small scale fisheries in supporting the FIP process.
1.2.4	No action is needed.
2.1.1	This PI takes into consideration the cumulative impact of other MSC certified fisheries in
2.1.2	the fishery area.
2.1.3	The main primary species identified are yellowfin and bigeye. Echebastar will: (i) continually review catch data for its vessels to confirm those species that may be

	considered as primary species; (ii) monitor the status of the primary species to identify whether any change in score may be considered by the auditors; (iii) consider the potential for a change in score when other Indian Ocean fisheries enter the MSC assessment process.
2.2.1	This PI takes into consideration the cumulative impact of other MSC certified fisheries in the fishery area.
2.2.2	Echebastar will request the FIP to review this PI with the removal of silky shark to component 2.3.
2.2.3	No main secondary species are identified. Echebastar will: (i) continually review catch data for its vessels to confirm that this remains the case, with special consideration of blue marlin, rainbow runner & dolphinfish; (ii) consider the potential for a change in score when other Indian Ocean fisheries enter the MSC assessment process.
	The on-board process for Echebastar vessels will be reviewed with explicit consideration on the issue of shark finning.
2.3.1	This PI takes into consideration the cumulative impact of other MSC certified fisheries in
2.3.2	the fishery area. Echebastar will draft a Silky Shark Management Plan for implementation on its vessels. In cooperation with FIP, Echebastar will examine the current situation, identify where changes may be needed and define actions to reduce the risk. In addition, Echebastar will: (i) continually review catch data for its vessels to confirm those species that may be considered as ETP species; (ii) consider the potential for a change in score when other Indian Ocean fisheries enter the MSC assessment process.
2.3.3	Condition 1.
	See below.
	Recommendation 2: A greater percentage of observer data is available for review each year at annual surveillance audits to better assess impacts on ETP species.
	Response to this recommendation is explicit in the approach of Echebastar and AZTI. Regular monitoring will identify if there are issues in meeting the need for to increase the proportion of total sets to an agreed minimum level.
2.4.1	Condition 2.
	See below.
	Echebastar will fully cooperate in FIP related actions.
2.4.2	This PI takes into consideration the cumulative impact of other MSC certified fisheries in the fishery area. Echebastar will fully cooperate in FIP related actions.
	Condition 3.
	See below.
2.4.3	Condition 4.
	See below.
	Recommendation 3: Echebastar maintains a database of the number of lost FADs by area and date.
	This issue should be considered within the FAD Management Plan.
	Echebastar will fully cooperate in FIP related actions.

2.5.1	Echebastar will fully cooperate in FIP related actions.
2.5.2	Echebastar will fully cooperate in FIP related actions.
2.5.3	Condition 5.
	See below.
3.1.1	No action is required by Echebastar apart from monitoring progress in the FIP.
3.1.2	Condition 6.
	See below.
3.1.3	No action is required by Echebastar
3.2.1	Condition 7.
	See below.
3.2.2	Condition 8.
	See below.
3.2.3	Echebastar will closely monitor the situation in relation to MCS of the Indian Ocean purse seine tuna fishery. Echebastar will monitor progress in the FIP.
3.2.4	No action is required by Echebastar

4. <u>Conditions to Certification</u>

CONDITION	1
PI	2.3.3
CONDITION	By the fourth annual surveillance audit, the client must demonstrate that information is adequate to measure trends and support a strategy to manage impacts on ETP species.
YEAR 1: MILESTONE	Years 1-3. Echebastar must provide evidence at the 1-3 annual surveillance audits that the amount of processed data available has been significantly improved and that protocols for data processing have been established to assure the provision of the data required in future years. Expected score = 70
YEAR 1: CLIENT ACTION PLAN	ISSF has urged the IOTC to adopt 100% observer coverage on the tuna purse seine fleet.
	Echebastar vessels are registered in the ISSF PVR (Pro-active Vessel Register) ISSF.
	SFA has agreed to provide the necessary support to ensure continued 100% observer coverage of Echebastar tuna purse seine vessels, as in place since January 2014. There is a MOA (Memorandum of Agreement) between the two parties.
	Echebastar is working with SFA and AZTI to improve the processing of observer data into useful data sets. The problems of the initial years are being overcome, and Echebastar will present catch data from a minimum of 50% of the all sets. Echebastar will ensure that the available data are representative of the entire UoA.
	Echebastar actively collaborates with research centres (IEO and AZTI, IOTC members and ISSF) in using the available data.
	Action Years 1-3
	 SFA & AZTI observers will continue the monitoring of catch and bycatch by all Echebastar vessels. The data provided will allow a better understanding of the status and trends of retained species. SFA will survey bycatch and discards in sufficient detail (species, sex, capture location, size and fate) to allow quantification of total catch, species composition and vulnerable species interacting with the fishery. Echebastar will continue to record the by catch of vulnerable species bycatch and report all catches as per IOTC Resolution and bycatch reporting protocols. AZTI will receive the data required according to the EU data collection framework http://datacollection.jrc.ec.europa.eu/. The data will be standardized and analysed, to monitor the compliance with the good practice code of Echebastar fleet.
	Deliverable Years 1-3

• Updated catch data tables from at a minimum of 50% of the total sets for the years 2015 – 18 at the first surveillance audit.

Action Lead

AZTI will be:

- Be the responsible entity to verify and certify all recorded data.
- Ensure validity, continuity and quality of the data.
- Ensure the data complies with the good practice code.

Action partners

Echebastar will:

- Provide all required data.
- Participate in all meetings to monitor the implementation of defined tasks.
- Participate in all workshops.
- Document all activities.

Stakeholders

Seychelles Fishing Authority

SCOPE

The response to this condition is straightforward in that it requires that sufficient data is available to identify (i) the real impact of the Echebastar fishery on ETP species; and (ii) any trends in that impact. This issue relates to both the quantity and quality of the information. Catch data (which also meets the requirements for PIs 1.2.3, 2.1.3 and 2.2.3) should be broken down into landings and discards. It is accepted that 5 years is the minimum period needed to identify trends.; while 50 % coverage the minimum sampling size.

At the same time, it is recognised that consideration of fishery impacts on ETP species relates to both direct and indirect effects. Accordingly, information should cover not only the catch of ETP species, but also any other interactions such as with FADs, or specimens that are released from the purse prior to brailing and those that are released from the brail. This is particularly important for silky shark. In following the FIP action of developing a management plan for silky shark; a pre-requisite of this is improved data.

OBJECTIVES

YEAR 1

- 1. Maintain the current data collection system for all species, with regular review to identify any potential issues related to ETP species.
- 2. In 2019, verify the data for 2015 to 2018 and ensure that 2019 valid data is collected and collated for a minimum of 50 % of the FAD sets.
- Review the current approach to collecting data on indirect interactions of the fishery with ETP species and design and implement a system to ensure the collection of robust data that is enough to inform the design and implementation of a specific management plan for silky shark (and other species as appropriate).
- 4. In 2019, provide data on a quarterly data for revision and analysis i.e. end June 2019 review data for the period Jan April 2019.
- Ensure that relevant data for January 2016 September 2019 is available for review at the first annual surveillance audit (FASA) scheduled for December 2019.

ACTIVITIES & RESPONSIBILITIES

Echebastar will:

C1A01E1: Provide all catch and landing data to AZTI for verification and tabulation within 4 weeks of the end of each fishing trip.

C1A02E2: Review the current approach to collection of data on indirect interactions of their vessels with ETP species and assess how these meet (i) IOTC requirements (ii) Echebastar policy to lead industry initiatives to improve data availability and quality.

C1A03E3: Design and implement a new methodology to collect data on indirect interactions of their vessels with ETP species.

C1A04E4: Participate in all meetings related to the collection, analysis and review of the collected data and provide an accurate minute of the meetings for submission to the FASA.

C1A05E5: Highlight potential increased risk for ETP species due to interaction with the Echebastar fishery that may lead to stakeholder comment.

C1A06E6: Check the state of this condition in the FIP and identify synergies between both action plans.

C1A07E7: Review the progress in implementing the WP and associated results at end-March; end-June and end-September.

C1A08E8: By November 15, 2019, draft a report for the FASA with evidence of compliance with the defined milestone for Condition 1.

AZTI will:

C1A09A1: Observe and monitor the catch and fishing vessels according to agreed protocols. Reports will be provided according to the agreed formula within 4 weeks of the end of each vessel trip.

C1A10A2: Increase the observer data coverage based on the work to be deployed in the projects: IM-19-descar, SeyTuna II (2019), Proyecto de Buenas Prácticas.

C1A11A3: Contribute to the review of data availability required to identify the indirect impact of the Echebastar fishery on ETP species.

C1A12A4: Within one-month of receiving data from Echebastar, standardize and analysis it to provide validated information to Echebastar within 4 weeks (e.g. data from February 2019 that will be received by AZTI by end-March 2019 will be analyzed and delivered to Echebastar by end-April 2019.

C1A13A5: Participate in all meetings related to the collection, analysis and review of the collected data.

SFA will:

C1A14S1: Observe and monitor the catch and fishing vessels according to agreed protocols. Reports will be provided according to the agreed formula within 2 weeks of the end of each vessel trip.

C1A15S2: Monitor by-catch and discards in the fishery (species, catch location, size and use) and quantify total catch, breakdown by species,

	includiną ETP spec C1A16S3 review c	cies. 3: Par	ticipa	nte in	all m	neetings							
SCHEDULE		J	F	М	Α	М	J	J	Α	S	0	N	D
	C1A01E1												
	C1A02E2												
	C1A03E3												
	C1A04E4												
	C1A05E5												
	C1A06E6												
	C1A07E7												
	C1A08E8												
	C1A09A1												
	C1A10A2												
	C1A11A3												
	C1A12A4												
	C1A13A5												
	C1A14S1												
	C1A15S2												
	C1A16S3												

CONDITION	2
PI	2.4.1
CONDITION	By the fourth annual surveillance audit, the client must demonstrate that FADs are highly unlikely to reduce structure and function of coral reefs to a point where there would be serious or irreversible harm.
YEAR 1: MILESTONE	Echebastar must provide evidence to the first annual surveillance that a plan has been implemented to ensure that FADs are highly unlikely to reduce structure and function of coral reefs to a point where there would be serious or irreversible harm.
	Expected score = 75
YEAR 1: CLIENT ACTION PLAN	Echebastar has already partially implemented a work programme to respond to this condition as part of its approach to reduce its fishery imprint on the IO ecosystem and reduce the risk of any element of the fishery causing permanent damage.
	Actions Year 1
	Echebastar will work with all stakeholders to define a plan aimed at reducing the risk of derelict FADs damaging coral reefs throughout the Indian Ocean. It is anticipated that this plan will consist a number of measures:
	 The continued development and practical implementation of biodegradable FADs. Cooperative work with relevant ENGOs in the Seychelles to test the difference in the impacts of biodegradable and traditional non-entangling FADs in selected locations. Reaching out to ENGOs in other countries to determine the potential risk to corals from derelict FADs. Monitoring the results of the current OPAGAC project in Seychelles and examining where this may be replicated in other countries. Gathering more information on lost FADs and examining how they may be tracked.
	Deliverables Year 1.
	Echebastar will present the first annual audit with a report that presents the defined strategy, the resources allocated for its implementation and any results to-date.
	Action Owner
	• ECHEBASTAR
	• AZTI
	Action Partners
	• ANABAC
	• OPAGAC
	• AZTI
	Selected ENGOs.

FIP - SIOTI

Stakeholders

- Seychelles Fishing Authority (SFA)
- Fishermen and boat owners' associations (FBOA)
- Local processing industry
- Fish market stakeholders
- ENGOs

SCOPE

Meeting this condition and associated milestones is directly related to Conditions 3 & 4 below. There must be a phased approach to the three PIs that comprise Component 2.4

The first point to be made in considering the approach to responding to this condition is to recall that the PI is specific to the UOA i.e. it must meet the standard in the context of:

- Sia: The UoA is highly unlikely to reduce structure and function of the commonly encountered habitats to a point where there would be serious or irreversible harm. In the assessment the fishery met Sia SG80.
- Sib: The UoA is highly unlikely to reduce structure and function of the VME habitats to a point where there would be serious or irreversible harm. In the assessment the fishery met Sib SG 60: the UoA is unlikely to reduce structure and function of the VME habitats to a point where there would be serious or irreversible harm. The VME habitat in question is corals, that are widely dispersed throughout the range of the fishery and in adjacent coastal areas.

It should be noted that PI 2.4.1 does not take cumulative impacts into account; these are considered under PI 2.4.2 (Management Strategy).

The FIP responds to similar concerns and defines three action as noted above. However, as of mid-2018 none of the actions had been implemented.

The question is what evidence may be presented to allow the scoring rational to change the risk from unlikely to highly unlikely for corals. The only response is to concentrate on better understanding the nature of the issue including the potential for negative impact over a number of years.

A range of possible actions may reduce the risk of adverse impact; biodegradable FADs, cooperative work with local ENGOs to assess the nature of interaction; limiting the total number of FADs deployed by Echebastar; recovering lost FADs before they become derelict on coral reefs, and recovering FADs that have become derelict on coral reefs.

The required response in the first year of MSC certification is to consider the issue of potential damage to corals in a wider context, and this calls for an "Echebastar FAD Management Plan". The baseline study for such an action

plan will review the current use of FADs by Echebastar and the Indian Ocean purse seine fleet in general as background to the design and implementation of a FAD Action Plan that will consist of a number of budgeted and time limited projects that are designed to reduce risk. In the meantime, current activities (e.g. the design of bio-degradable FADs and cooperation with OPAGAC) may continue.

It was clear from the MSC assessment process that many stakeholders do not fully understand the FAD fishery and how it operates.

Echebastar will implement part of the Plan before the FASA.

The Plan will be designed in full cooperation with the FIP to meet the aim of establishing best practices for the purse seine fleet as a whole and so provide the basis for meeting the MSC standard for PI 2.4.2 should other purse seine FAD fisheries in the Indian Ocean be MSC certified.

The Plan will also cover the issues related to meeting the MSC standard for PI 2.5.1, with information provided on the potential impact of FADs ecosystem structure and function; specifically, the potential to change the migratory patterns of tunas.

OBJECTIVES YEAR 1

- 1. Provide the resources required to provide a robust response to the FAD related issues that are the main area of contention between ENGOs and the Indian Ocean purse seine fishery.
- 2. Maintain current activities in relation to the FAD issue e.g Bio-degradable FADs, cooperative work with OPAGAC and local ENGOs.
- 3. Ensure that a wide range of stakeholders have a clear idea of the "reality" of the FAD fishery.
- 4. Insofar as possible coordinate activities with those of the FIP.
- 5. Complete a baseline study that examines the current practises in FAD usage and categorises the risk to other elements of the ecosystem.
- 6. On the basis of the information provided, identify projects and actions that will (i) improve understanding of the impact of FADs on other elements of the ecosystem and the identify the level of associated risk, both for the Echebastar fleet of purse seiners and the overall purse seine fleet working the Indian Ocean and (ii) mitigate that risk.
- 7. Implement selected projects.
- 8. Present evidence to the FASA that the fishery has met the defined milestone.

ACTIVITIES & RESPONSIBILITIES

Echebastar will:

C2A17E1: Continue with established FAD related activities.

C2A18E2: Prepare a wide bearing baseline study on the current situation in relation to the use of FADs in the Indian Ocean tuna fishery including a gap analysis of the information available.

C2A19E3: By August, 2019, present a draft FAD Management Strategy for the consideration of FIP partners and other interested stakeholders.

C2A20E4: By end September, 2019, begin implementation of selected projects, including those that are a continuation of current activities that

		provide the information needed to identify indicators and sources of verification.											
		C2A21E5 Check the state of this condition in the FIP and identify synergies between both action plans.											
		C2A22E6: Review progress in implementing the WP and associated results at end-March; end-June and end-September.											
	C2A23E7 evidence								•				with
	AZTI will:												
	C2A24A1 reports.	Supp	ort tl	he dra	fting	of the	actio	n pla	n and	l peer	revie	w the	draft
	C2A25A2 activities		itinue	e its c	urrer	it wo	rk pr	ogran	nme	on F	AD /	FIP re	elated
	C2A26A3 deploye Práctica	d in th	ne fol	llowin	g pro	jects:	IM17	BIOF	AD, P	royec			
	C2A27A on the c Ocean t	urren				•							udy
SCHEDULE		J	F	М	Α	М	J	J	Α	S	0	N	D
	C2A17E1												
	C2A18E2												
	C2A19E3												
	C2A20E4												
	C2A21E5												
	C2A22E6												
	C2A23E7												
	C2A24A1 C2A25A2												
	C2A25A2 C2A26A3												
	C2A27A4												

CONDITION	3
PI	2.4.2
CONDITION	By the third annual surveillance audit, the client must provide evidence that a partial strategy in place that is expected to result that it will be highly unlikely that derelict FADs could reduce structure and function of the coral reefs to a point where there would be serious or irreversible harm.
YEAR 1: MILESTONE	These are linked to Condition 2. Echebastar must provide evidence to the first annual surveillance that a partial strategy has been defined and implemented to ensure that FADs are

highly unlikely to reduce structure and function of coral reefs to a point where there would be serious or irreversible harm.

Expected score = 75.

YEAR 1: CLIENT ACTION PLAN

Please refer to actions for Years 1, 2 & 3 above.

Actions Year 1

Echebastar will work with all stakeholders to define a partial strategy aimed at reducing the risk of derelict FADs damaging coral reefs throughout the Indian Ocean. It is anticipated that this partial strategy will consist a number of measures:

- The continued development and practical implementation of biodegradable FADs.
- Cooperative work with relevant ENGOs in the Seychelles to test the difference in the impacts of biodegradable and traditional nonentangling FADs in selected locations.
- Reaching out to ENGOs in other countries to determine the potential risk to corals from derelict FADs.
- Monitoring the results of the current OPAGAC project in Seychelles and examining where this may be replicated in other countries.
- Gathering more information on lost FADs and examining how they may be tracked.

Deliverables Year 1.

Echebastar will present the first annual audit with a report that presents the defined strategy, the resources allocated for its implementation and any results to-date.

SCOPE

Meeting this condition and associated milestones is directly related to Condition 2 above and Condition 4 below. There must be a phased approach to the three PIs that comprise Component 2.4

The main current issue is related to Sia i.e. There is a partial strategy in place, if necessary, that is expected to achieve the Habitat Outcome 80 level of performance or above, While the MSC assessment concluded that a partial strategy was in place, it found that there was not the confidence that the main measure (biodegradable FADs) would achieve the SG80 level at PI 2.4.1.

Any activity should recognise the implications of the MSC definition of partial strategy i.e. "a cohesive arrangement which may comprise one or more measures, an understanding of how it/they work to achieve an outcome and an awareness of the need to change the measures should they cease to be effective. It may not have been designed to manage the impact on that component specifically". This requires knowledge and understanding of activities in similar fisheries.

It should also be recognised that in the future other Indian Ocean tuna FAD fisheries may be certified as meeting the MSC standard and cumulative impacts will have been considered in the harmonisation process. These may have a retrospective impact on the scoring of the Echebastar fishery (The SI in question is Sid: "There is some quantitative evidence that the UoA complies

Given the marginal nature of score achieved by Echebastar for P2, Echebastar will be proactive in minimizing the risk that the score for P1.2.4.2 is reduced. OBJECTIVES YEAR 1 1. Continue with current activities (e.g. biodegradable FADs) to provide evidence that measures comprising a partial strategy have been implemented. 2. At the FASA, provide evidence that a formal partial strategy has been defined and implemented to ensure that FADs are highly unlikely to reduce structure and function of coral reefs to a point where there would be serious or irreversible harm. 3. By the FASA, progress has been made in coordinating activities with the FIP those Indian Ocean FAD tuna fisheries that may be MSC certified in the short- to medium- term. Echebastar will: C3A28E1: See C2A17E1. C3A29E2: See C2A20E4 C2A30E3: Check the state of this condition in the FIP and will identify synergies between both action plans. C3A31E4: Review progress in implementing the WP and associated results at end-March; end-June and end-September. C3A32E5: By November 15, 2019, draft a report for the FASA with evidence of compliance with the defined milestone for Condition 3. AZTI will: C3A33A1: Extend the information in relation to FADs based on the work deployed in the following projects: Proyecto de Buenas Prácticas, IOTC recommendation in relation to FAD WATCH project. SCHEDULE SCHEDULE J F M A M J J A S O N D C3A32E1 C3A32E5 C3A32E5 C3A32E5 C3A32E5 C3A32E5 C3A32E5 C3A32E5 C3A32E5 C3A32E61 C3A32A1 C3A33A1 C3A33A1			with both its management requirements and with protection measures afforded to VMEs by other MSC UoAs/non-MSC fisheries, where relevant").											
evidence that measures comprising a partial strategy have been implemented. 2. At the FASA, provide evidence that a formal partial strategy has been defined and implemented to ensure that FADs are highly unlikely to reduce structure and function of coral reefs to a point where there would be serious or irreversible harm. 3. By the FASA, progress has been made in coordinating activities with the FIP those Indian Ocean FAD tuna fisheries that may be MSC certified in the short- to medium- term. Echebastar will: C3A28E1: See C2A17E1. C3A29E2: See C2A20E4 C2A30E3: Check the state of this condition in the FIP and will identify synergies between both action plans. C3A31E4: Review progress in implementing the WP and associated results at end-March; end-June and end-September. C3A32E5: By November 15, 2019, draft a report for the FASA with evidence of compliance with the defined milestone for Condition 3. AZTI will: C3A33A1: Extend the information in relation to FADs based on the work deployed in the following projects: Proyecto de Buenas Prácticas, IOTC recommendation in relation to FAD WATCH project. SCHEDULE J F M A M J J A S O N D C3A28E1 C3A30E3 C3A31E4 C3A31E4 C3A31E4 C3A32E5 C3A31E4 C3A32E5		•												
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FIP those Indian Ocean FAD tuna fisheries that may be MSC certified in the short- to medium- term. Echebastar will: C3A28E1: See C2A17E1. C3A29E2: See C2A20E4 C2A30E3: Check the state of this condition in the FIP and will identify synergies between both action plans. C3A31E4: Review progress in implementing the WP and associated results at end-March; end-June and end-September. C3A32E5: By November 15, 2019, draft a report for the FASA with evidence of compliance with the defined milestone for Condition 3. AZTI will: C3A33A1: Extend the information in relation to FADs based on the work deployed in the following projects: Proyecto de Buenas Prácticas, IOTC recommendation in relation to FAD WATCH project. SCHEDULE J F M A M J J A S O N D C3A28E1 C3A39E2 C3A30E3 C3A31E4 C3A32E5		defined reduce s	and struct	imple ure a	ement nd fur	ed to	ensu of co	ure t	hat F	ADs	are h	ighly	unlike	ely to
C3A28E1: See C2A17E1. C3A29E2: See C2A20E4 C2A30E3: Check the state of this condition in the FIP and will identify synergies between both action plans. C3A31E4: Review progress in implementing the WP and associated results at end-March; end-June and end-September. C3A32E5: By November 15, 2019, draft a report for the FASA with evidence of compliance with the defined milestone for Condition 3. AZTI will: C3A33A1: Extend the information in relation to FADs based on the work deployed in the following projects: Proyecto de Buenas Prácticas, IOTC recommendation in relation to FAD WATCH project. SCHEDULE J F M A M J J A S O N D C3A28E1 C3A29E2 C3A30E3 C3A31E4 C3A32E5		FIP those	e Indi	an Od	cean F	AD tu								
C3A29E1: See C2A17E1. C3A29E2: See C2A20E4 C2A30E3: Check the state of this condition in the FIP and will identify synergies between both action plans. C3A31E4: Review progress in implementing the WP and associated results at end-March; end-June and end-September. C3A32E5: By November 15, 2019, draft a report for the FASA with evidence of compliance with the defined milestone for Condition 3. AZTI will: C3A33A1: Extend the information in relation to FADs based on the work deployed in the following projects: Proyecto de Buenas Prácticas, IOTC recommendation in relation to FAD WATCH project. SCHEDULE J F M A M J J A S O N D C3A28E1 C3A30E3 C3A31E4 C3A32E5		Echebastar	will:											
C2A30E3: Check the state of this condition in the FIP and will identify synergies between both action plans. C3A31E4: Review progress in implementing the WP and associated results at end-March; end-June and end-September. C3A32E5: By November 15, 2019, draft a report for the FASA with evidence of compliance with the defined milestone for Condition 3. AZTI will: C3A33A1: Extend the information in relation to FADs based on the work deployed in the following projects: Proyecto de Buenas Prácticas, IOTC recommendation in relation to FAD WATCH project. SCHEDULE J F M A M J J A S O N D C3A28E1 C3A29E2 C3A30E3 C3A31E4 C3A32E5	RESPONSIBILITIES	C3A28E2	1: See	C2A	17E1.									
synergies between both action plans. C3A31E4: Review progress in implementing the WP and associated results at end-March; end-June and end-September. C3A32E5: By November 15, 2019, draft a report for the FASA with evidence of compliance with the defined milestone for Condition 3. AZTI will: C3A33A1: Extend the information in relation to FADs based on the work deployed in the following projects: Proyecto de Buenas Prácticas, IOTC recommendation in relation to FAD WATCH project. SCHEDULE J F M A M J J A S O N D C3A28E1 C3A30E3 C3A31E4 C3A32E5		C3A29E2	2: See	C2A	20E4									
at end-March; end-June and end-September. C3A32E5: By November 15, 2019, draft a report for the FASA with evidence of compliance with the defined milestone for Condition 3. AZTI will: C3A33A1: Extend the information in relation to FADs based on the work deployed in the following projects: Proyecto de Buenas Prácticas, IOTC recommendation in relation to FAD WATCH project. SCHEDULE J F M A M J J A S O N D C3A28E1 C3A32E2 C3A30E3 C3A31E4 C3A32E5									tion	in the	e FIP	and v	vill id	entify
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C3A33A1: Extend the information in relation to FADs based on the work deployed in the following projects: Proyecto de Buenas Prácticas, IOTC recommendation in relation to FAD WATCH project. SCHEDULE J F M A M J J A S O N D C3A28E1 C3A29E2 C3A30E3 C3A31E4 C3A32E5										•				with
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C3A28E1 C3A29E2 C3A30E3 C3A31E4 C3A32E5		deployed in the following projects: Proyecto de Buenas Prácticas, IOTC												
C3A29E2 C3A30E3 C3A31E4 C3A32E5	SCHEDULE		J	F	М	Α	М	J	J	Α	S	0	N	D
C3A30E3 C3A31E4 C3A32E5		C3A28E1												
C3A31E4		C3A29E2												
C3A32E5														
LORGONI		C3A32E5												

CONDITION	4
PI	2.4.3
CONDITION	By the fourth annual surveillance audit, the client must provide evidence that information is adequate to allow for identification of the main impacts of derelict FADs on coral reefs, and there is reliable information on the spatial extent of interaction and on the timing and location of use of the fishing gear.
YEAR 1:	These are linked to Condition 2.
MILESTONE	Echebastar must provide evidence to the first annual surveillance that the partial strategy includes the approach to improving the information base.
	Expected score = 75
YEAR 1: CLIENT	Please refer to actions for Years 1, 2-3 & 4 above.
ACTION PLAN	Actions Year 1
	Echebastar will work with all stakeholders to provide evidence that the partial strategy includes the approach to improving the information base.
	Deliverables Year 1.
	Echebastar will present the first annual audit with a report that presents that the partial strategy includes the approach to improving the information base.
SCOPE	Meeting this condition and associated milestones is directly related to Condition 2 & 3 above. There must be a phased approach to the three PIs that comprise Component 2.4
	The reason why the Echebastar fishery failed to achieve 80 in the assessment was that it did not meet SG80 Sib i.e.
	"Information is adequate to allow for identification of the main impacts of the UoA on the main habitats, and there is reliable information on the spatial extent of interaction and on the timing and location of use of the fishing gear".
	The audit team found that
	"While the article cited above provides good information on the spatial extent of interaction in the Seychelles, similar data are not available for other countries. A precautionary approach would suggest that the potential for impacts to occur should be further investigated. There is limited information on the spatial extent, timing and location of FAD interactions with coral reefs, and this is not adequate to understand the nature of the impacts of the gear on coral habitat".
	The FASA milestone is straightforward; the partial strategy must address required improvement in the information base.
	C2A16E2 will identify gaps in the information base while the projects selected under C2A19E4 will include activities designed to improve available information. The information will cover all tuna FAD fisheries and not be restricted to Echebastar and the Indian Ocean.
OBJECTIVES YEAR 1	Assess the quality and quantity of available information on the main impacts of derelict FADs on coral reefs.

	1													
	coral ree	2. The design of projects to reduce the risk of impacts of derelict FADs on coral reefs incorporates activities designed to provide better information and provide reliable indicators and sources of verification.												
ACTIVITIES &	Echebastar will:													
RESPONSIBILITIES	C4A34E1: See C2A18E2.													
	C4A35E2: See C2A20E4 C4A36E3: Check the state of this condition in the FIP and will ident synergies between both action plans. C4A37E4: Review progress in implementing the WP and associated resulat end-March; end-June and end-September.													
													entify	
													esults	
	C4A38E5: By November 15, 2019, draft a report for the FASA with evidence of compliance with the defined milestone for Condition 4.													
	AZTI will:													
	C4A39A1 deployed recomme	l in t	he fo	llowir	ng pro	jects:	Proy	ecto/	de B					
SCHEDULE		J	F	M	Α	М	J	J	Α	S	0	N	D	
	C4A34E1													
	C4A35E2													
	C4A36E3													
	C4A37E4													
	C4A38E5													
	C4A39A1													

CONDITION	5							
PI	2.5.3							
CONDITION	Sla. By the fourth annual surveillance audit, the client must provide evidence that the main impacts of the FADs used in the UoA/UoC on these key ecosystem elements can be inferred from existing information, and some have been investigated in detail.							
	SId. By the fourth annual surveillance audit, the client must provide evidence that there is adequate information on the impacts of the UoA on these components to allow some of the main consequences for the ecosystem to be inferred.							
YEAR 1: MILESTONE	chebastar must provide evidence to the first annual surveillance that the ptions to investigate the potential impact of the FADs used in the UoA/UoC n the ecosystem have been identified and the preferred option for ovestigation has been implemented. Expected score = 75							
YEAR 1: CLIENT	Actions Year 1							
ACTION PLAN	 Echebastar will review literature on: the "ecological trap" hypothesis of FADs on the behaviour, feeding and migration of key elements of the ecosystem; indications of other potential impacts of FADs on key elements of the ecosystem. 							
	 Echebastar will define its approach to: investigating the potential impact of the UOA FADs on the behaviour, feeding and migration of key elements of the ecosystem; and providing indications of the other potential impacts of UOA FADs on key elements of the ecosystem. 							
	Deliverables Year 1							
	Report on findings of literature review.							
	Definition of the approach to be taken by Echebastar in meeting the condition							
	Action Lead							
	Echebastar							
	Action Partners							
	• AZTI							
	• ANABAC							
	• OPAGAC							
	Minister (Seychelles)							
	Local stakeholders							
	Stakeholders							
	Seychelles Fishing Authority (SFA)							
	Fishermen and boat owners associations (FBOA)							
	Local processing industry							

- Fish market stakeholders
- NGOs

SCOPE

The reason why the Echebastar fishery failed to achieve 80 in the assessment was that it did not meet SG80 Sib i.e.

"Main impacts of the UoA on these key ecosystem elements can be inferred from existing information, and some have been investigated in detail.".

and

"Adequate information is available on the impacts of the UoA on these components to allow some of the main consequences for the ecosystem to be inferred".

The audit team found that

"The effects of FADs used in the fishery on tuna behaviour, migration patterns and feeding are a subject of numerous ongoing investigations. Dagorn et al (2012) conclude that there is no unequivocal empirical evidence that FADs represent an 'ecological trap' that inherently disrupts tuna biology, although further research should focus on this issue. Therefore, the main impacts of the UoA on these key ecosystem elements cannot be inferred from existing information, and some have not been investigated in detail".

and

"The impact of FADs on tuna behaviour, feeding and migration, and any consequent impacts on ecosystem function, is not fully understood. Therefore, adequate information is not available on the impacts of the UoA on these components to allow some of the main consequences for the ecosystem to be inferred".

The FASA milestone is straightforward; Echebastar must provide evidence to the first annual surveillance that the partial strategy includes the approach to improving the information base

C2A16E2 will identify gaps in the information base while the projects selected under C2A19E4 will include activities designed to improve available information on the impact of FADs on the ecosystem. The information will cover all tuna FAD fisheries and not be restricted to Echebastar and the Indian Ocean.

It is recognised that while Component 2.5 is Echebastar (UoC) specific, the required information will most likely only be available within the context of a general understanding that identifies the level of risk associated with FADs per se.

In turn this recognises that meeting the condition could be difficult as the subject area is little understood. Thus there will need to be a clear idea of the limits to Echebastar actions.

OBJECTIVES

YEAR 1

- 1. The current understanding of the impact of FADs on the ecosystem is covered in the FAD Management Strategy.
- 2. Project(s) that are designed to improve understanding of the potential impacts of FADs have been defined and implemented.

ACTIVITIES & RESPONSIBILITIES

Echebastar will:

C5A40E1: Prepare a wide bearing baseline study on the current situation in relation to the use of FADs in tuna fisheries including an analysis of the information available on the potential impact of those FADs on the ecosystem.

C5A41E2: By end September 2019, begin implementation of selected projects, including activity to improve understanding of the impact of the UoC FADs on the ecosystem.

C5A42E3: Check the state of this condition in the FIP and will identify synergies between both action plans.

C5A43E4: Review progress in implementing the WP and associated results at end-March; end-June and end-September.

C5A44E5: By November 15, 2019, draft a report for the FASA with evidence of compliance with the defined milestone for Condition 2.

AZTI will:

C5A45A1: Review the results of the thesis of Blanca Orue based on Echebastar data.

C5A46A2: Literature review of "Ecological Trap".

C5A47A3: Request Echebastar to provide data from IEO buoys to continue the data exploitation.

C5A48A4: Contribute to the preparation of Echebastar's baseline study on the current situation in relation to the use of FADs in the Indian Ocean tuna.

SCHEDULE

	J	F	М	Α	М	J	J	Α	S	0	N	D
C5A40E1												
C5A41E2												
C5A42E3												
C5A43E4												
C5A44E5												
C5A45A1												
C5A46A2												
C5A47A3					·							
C5A48A4												•

CONDITION	6
PI	3.1.2
CONDITION	By the third annual surveillance audit, the management system in the Seychelles includes consultation processes that regularly seek and accept relevant information, including local knowledge. The management system demonstrates consideration of the information obtained.
YEAR 1: MILESTONE	Echebastar will provide evidence to the audit team in the first annual surveillance audit that the options to improve the consultation process in the management of the Seychelles tuna fisheries have been discussed.
	Expected score = 75
YEAR 1: CLIENT ACTION PLAN	The Seychelles Fishing Authority (SFA) works in close collaboration with its parent Ministry, other Government entities, and a wide range of other stakeholders including international agencies, NGOs (e.g. WWF), fishermen and their representatives (e.g. FBOA).
	As identified in the evaluation report, it is widely recognised that, in the past, the involvement of stakeholders in the decision-making process has been less than optimal and this has led to steps being taken to strengthen the processes. Evidence of improvement is available through the approach adopted in preparing existing fishery management plans and recent participation of FBOA in IOTC meetings.
	Accordingly, the proposed client action is based on reinforcing the progress that has been made. While Echebastar does not have the authority to manage the process, they will work with SFA and other key stakeholders (especially the FBOA and other fisher representative groups) to ensure that any tuna FMP is based on a comprehensive consultation process that has considered the views expressed by all stakeholders. Further, Echebastar will propose that the reasons for not accepting any views and opinions of individual stakeholders are fully documented.
	A Fishery Improvement Project (FIP) for Indian Ocean tuna has been established in early 2017. In this framework, the Sustainable Indian Ocean Tuna Initiative (SIOTI) has been jointly established by key governments in the region, major tuna processors, producer organisations and their fishing vessels, with the support of WWF. This FIP is a multi-stakeholder effort, and it's goal is to support improvement in the management of tuna fisheries in the Indian Ocean. SFA leads this FIP. SFA recognises the importance of using best practise in developing and implementing fishery management plans and is committed to fully cooperate with Echebastar in meeting the conditions to MSC certification.
	Actions Year 1
	 Echebastar will meet with SFA to promote the drafting of a fishery management plan by a dedicated Fisheries Management Committee that will comprise representatives of all key stakeholders.
	 Echebastar will ensure that SFA is fully aware of the best practise for preparation of fishery management plans.

- Echebastar will hold informal meetings with other stakeholders to consider their needs from the fishery management process, with the objective of gaining a consensus on the required approach
- Echebastar will encourage the participation of the FBOA in the annual IOTC meetings, and facilitate their involvement as required.
- In parallel the Action Plan of the Indian Ocean FIP will be carried out.

Deliverables Year 1

Minutes of all meetings held with the Ministry, SFA and other stakeholders will provide evidence that the options for improving the stakeholder consultation process have been identified and discussed.

IOTC reports on the annual meeting that provide evidence of the participation of Seychelles stakeholders and consideration of any issues that may be raised by them.

Action Owner

- ECHEBASTAR
- AZTI

Action Partners

- ECHEBASTAR
- AZTI
- Minister (Seychelles)
- FIP SIOTI

Stakeholders

- Seychelles Fishing Authority (SFA)
- Fishermen and boat owners' associations (FBOA)
- Local processing industry
- Fish market stakeholders
- NGOs

SCOPE

The reason why the Echebastar fishery failed to achieve 80 in the assessment was that it did not meet SG80 Sib i.e.

"The management system includes consultation processes that regularly seek and accept relevant information, including local knowledge. The management system demonstrates consideration of the information obtained.".

The audit team found that

"Evidence indicates the limited input of local stakeholders in the Seychelles decision making process. Where local stakeholders have expressed views, it is not clear how these have been taken into account. At the site visit, it was reported that meetings between the Minister and stakeholders are not minuted.

The lack of a mechanism to indicate if and how stakeholder information is used in the management system impacts transparency on how Seychelles fishery managers obtain and consider information and local knowledge". It is difficult for Echebastar to directly influence the situation, as the incorporation of stakeholders in the decision-making process is the choice of the Government of the Seychelles. However, it is noted that Seychelles recognises the importance of stakeholder empowerment. As an example, the terms of reference for a new project to review Seychelles Government Policy and draft a Fisheries Development Plan includes the following: Specific objective 2: Through a highly consultative process, develop comprehensive policy strategy and sector development plan to achieve the revised policy goals and objectives. Task 2: Engage with stakeholders (public and private sector, CSOs, NGOs, etc) on priorities for the fisheries and related sectors, and identify gaps or areas of the existing policy framework that require improvement and strengthening; Deliverable 4: Conduct a validation workshop (with stakeholders) and deliver a fisheries policy and strategy validation meeting report; It is anticipated that there will be other examples, even if they are not specifically related to the industrial tuna sector (Component 3.1 relates to the overarching approach and is not fishery specific). Accordingly, it should be fairly straightforward to provide the evidence required to satisfy FASA. In the first year, Echebastar will meet with the Government and stakeholders in the Seychelles, with available evidence collected in November 2019. **OBJECTIVES** 1. Seychelles Government Policy regarding stakeholder involvement in the fishery management process has been confirmed. YEAR 1 2. Evidence is presented to illustrate the involvement of stakeholder involvement in the decision-making process. **ACTIVITIES &** 1. Echebastar will: **RESPONSIBILITIES** C6A49E1: Occasional meetings with the Seychelles government and Sevchellois stakeholders. C6A50E2: Review progress in implementing the WP and associated results at end-March; end-June and end-September. C6A51E3: By November 15, 2019, draft a report for the FASA with evidence of compliance with the defined milestone for Condition 6. AZTI will: C6A52A1: Define a template for the minutes to compile the relevant information from different meetings with stakeholders and define a meeting schedule. **SCHEDULE** J F M Α M J Α S 0 Ν D C6A49E1 C6A50E2

C6A51E3						
C6A52A1						

CONDITION	7
PI	3.2.1
CONDITION	By the second annual surveillance audit, short and long-term objectives, which are consistent with achieving the outcomes expressed by MSC's Principles 1 and 2, are explicit within the fishery-specific management system
YEAR 1: MILESTONE	Echebastar will provide evidence to the audit team in the first annual surveillance audit that: (i) there has been consideration on the process of the establishment of the potential of short and long term objectives for the Seychelles skipjack tuna fishery in IOTC; and (ii) there has been consideration of possible short and long term objectives for fishing arrangements available for review by stakeholders including consideration of explicit short and long term objectives for this element of the fishery.
	Expected score = 75
YEAR 1: CLIENT ACTION PLAN	The client will work with other key stakeholders in response to identified shortcomings of the private fishery agreements and the approach to fisheries management in the Seychelles.
	Private Fishing Agreements
	The Echebastar fishing agreements are made with coastal states that are Contracting Parties of IOTC. Accordingly, these follow the recommendations of IOTC. However, we recognise that while short and long-term objectives are explicit within IOTC policy, this is not the case for private agreements due to their nature.
	The certification report correctly identifies several issues that may impact the approach to SFPAs and private agreements, while in relation to the latter it notes that they are approved by the Spanish Government, and the fisheries administration of the coastal state and are submitted to the IOTC.
	Additionally, given the fact that the ultimate aim of the SIOTI is to meet the highest standards of sustainable fishing, such as the Marine Stewardship Council (MSC) standard, it is assumed that this FIP will be working to fulfil this condition.
	Activities Year 1
	 Echebastar will meet with other Spanish fishing companies that benefit from private agreements in the context of their representative organisations, OPAGAC and ANABAC, to consider the approach to meeting the condition.
	 Echebastar will ensure that the issue is raised within the LDAC to ensure a wide consideration of the options to respond to the condition. This will be relevant, if, as anticipated, other segments of the EU distant water tuna fishing fleet aspire to MSC certification
	 Furthermore, there are several participants involved in the FIP that will ease to meet the condition.
	Deliverables Year 1

	Echebastar will present a report to the auditors with a list of the meetings with details on the decisions made, as supported by signed minutes.
SCOPE	The reason why the Echebastar fishery, in scoring 75 for the single SI ("Short and long-term objectives, which are consistent with achieving the outcomes expressed by MSC's Principles 1 and 2, are explicit within the fishery-specific management system") only partially achieved 80 in the assessment was related to the management in the Seychelles and lack of transparency in relation to Echebastar's private agreements i.e.
	"In the Seychelles, explicit short and long-term objectives for the Seychelles tuna fishery will not be available until the planned FMP is drafted and implemented".
	and
	"While specific long and short-term objectives are not well defined in the private agreements, the vessel licenses (Kenya and Tanzania) are more explicit especially for Kenya".
	In relation to the first issue, the main protagonist in defining short- and long-term objectives in the Seychelles fishery is the Government. It is understood that a specific tuna FMP will be prepared, although the draft fisheries development plan may serve purpose. Echebastar will maintain contact with the Government of Seychelles and look to be a recognised stakeholder in the process of defining the Fishery Development Plan and any tuna fisheries management planning.
	In relation to the second issue, in the recent past there have been initiatives to make the process in relation to private agreements more transparent, and Echebastar cwill onsider the best way to proceed.
OBJECTIVES	1. The approach to Seychelles management planning for the tuna fisheries
YEAR 1	will be clarified.
	2. The process regarding private fishery agreements will have been clarified.
ACTIVITIES &	Echebastar will:
RESPONSIBILITIES	C7A53E1: Occasional meetings with the Seychelles government.
	C7A54E2: Present views as appropriate to relevant working groups etc.
	C7A55E3: Liaise with FIP stakeholders
<u> </u>	I.

C7A56E4: Meet with other Spanish fishing companies that benefit from private agreements and their representative organisations to consider the approach to meeting the condition.

C7A57E5: Raise the issue within LDAC to ensure a wide consideration of the options to respond to the condition.

C7A58E6: Standardize all the private agreements (based on the template) and check if they fulfill the IOTC agreements.

C7A59E7. Review progress in implementing the WP and associated results at end-March; end-June and end-September.

C760E8: By November 15, 2019, draft a report for the FASA with evidence of compliance with the defined milestone for Condition 7.

AZTI will:

C7A61A1: Review the IOTC resolution 18/10 where there is a European proposal to standardize the agreements and define the objectives.

	proposai	proposal to standardize the agreements and define the objectives.											
SCHEDULE		J	F	М	Α	М	J	J	Α	S	0	N	D
	C7A53E1												
	C7A54E2												
	C7A55E3												
	C7A56E4												
	C7A57E5												
	C7A58E6												
	C7A59E7												
	C7A60E8												
	C7A61A1												

CONDITION	8									
PI	3.2.2									
CONDITION	By the third annual surveillance audit:									
	SId. Information on the fishery's performance and management action relevant to the Seychelles fishery and private agreements is available on request, and explanations are provided for any actions or lack of action associated with findings and relevant recommendations emerging from research, monitoring, evaluation and review activity									
YEAR 1: MILESTONE	Year 1. Echebastar will provide evidence to the audit team in the first annual surveillance audit that: (i) there has been consideration of the potential short and long-term objectives for the Seychelles skipjack tuna fishery; and (ii) there has been consideration of the mechanism for making information on private agreements available for review by stakeholders including consideration of explicit short and long-term objectives for this element of the fishery. Expected score = 75									
YEAR 1: CLIENT ACTION PLAN	The client will work with other key stakeholders in response to identified shortcomings of the private fishery agreements and the approach to fisheries management in the Seychelles.									
	Private Fishing Agreements									
	The Echebastar fishing agreements are made with coastal states that are Contracting Parties of IOTC. Accordingly, these follow IOTC requirements. However, we recognise that details on private agreements have led to some concern being expressed by stakeholders.									
	The certification report correctly identifies several issues that may impact the approach to SFPAs and private agreements, while in relation to the latter it notes that they are approved by the Spanish Government, and the fisheries administration of the coastal state and are submitted to the IOTC.									
	Activities Year 1									
	 Echebastar will meet with other Spanish fishing companies that benefit from private agreements in the context of their representative organisations, OPAGAC and ANABAC, to consider the approach to meeting the condition. 									
	 In that sense, OPAGAC and ANABAC are participants of the FIP, and as such, they will ensure to meet the highest standards of MSC. 									
	 Echebastar will ensure that the issue is raised within the LDAC to ensure a wide consideration of the options to respond to the condition. This will be relevant, if, as anticipated, other segments of the EU distant water tuna fishing fleet aspire to MSC certification 									
	Deliverables Year 1									
	 Echebastar will present a report to the auditors with a list of the meetings with details on the decisions made as supported by signed minutes 									

SCOPE

The FIP does not cover PI 3.2.2

There is an error in the text of the milestone; it should be modified to "(i) there has been consideration of how stakeholders may become more involved in the Seychelles tuna fishery management process and how to make the decision making process more transparent".

The reason why the Echebastar fishery failed to achieve 80 in the assessment was that it did not meet SG80 Sid i.e.

"Information on the fishery's performance and management action is available on request, and explanations are provided for any actions or lack of action associated with findings and relevant recommendations emerging from research, monitoring, evaluation and review activity.

The audit team found that

"Despite information being available to stakeholders, it has been highlighted that it is not always clear as to how available information has been used or why it has not been used (Powers & Medley, 2016).

The EU's Long Distant Advisory Council (LDAC) and the need for explicit responses from the European Commission (EC) and Member States (MS) satisfies SG80 for the EU jurisdiction. However, specific information is limited for those fisheries conducted under private arrangements.

As such, explanations are not provided for any actions or lack of action associated with findings and relevant recommendations emerging from research, monitoring, evaluation and review activity".

Accordingly, a dual approach is required to respond to the Condition.

Firstly, there is a need to confirm that (i) not only does the Seychelles approach involve stakeholders in the decision-making process but also explains to those stakeholders if, for whatever reason, their views and information have not been taken into account; and (ii) the Seychelles management process is transparent.

Secondly, the approach to private agreements is more transparent, with more information readily available to stakeholders on their nature and application.

OBJECTIVES Year 1

- 1. The Government of Seychelles has identified mechanisms to strengthen stakeholder involvement in the tuna fishery management process and improve the transparency of that process.
- 2. There has been consideration of how to make the process of private agreements more transparent.

ACTIVITIES & RESPONSIBILITIES

1. Echebastar will:

C8A62E1: See C7A53E1 C8A63E2: See C7A54E2 C8A64E3: See C7A55E3 C8A65E4: See C7A56E4

C8A66E5: See C7A57E5

C8A67E6. Review progress in implementing the WP and associated results at end-March; end-June and end-September.

	C8A68E7: By November 15, 2019, draft a report for the FASA with evidence of compliance with the defined milestone for Condition 8.												
	AZTI will:												
	C8A69A1: S C8A70A2: S												
SCHEDULE		J	F	М	Α	М	J	J	Α	S	0	N	D
	C8A62E1												
	C8A63E2												
	C8A64E3												
	C8A65E4												
	C8A66E5												
	C8A67E6												
	C8A68E7												
	C8A69A1												
	C8A70A2												