

Condition 1. PI 2.3.3 ETP species information “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.”

*ISSF Comment: There are currently a number of Indian Ocean purse seine and longline tuna fisheries involved in Fishery Improvement Projects (FIPs), some of them with prospects to proceed to a full MSC assessment in the near future. Although the MSC standard only requires cumulative effects to be evaluated and managed for MSC certified fisheries (including those in evaluation) under overlapping UoAs, we believe these should be carefully assessed (for ETP species, as well as other P2 components such as habitats) and managed for all these tuna fisheries with MSC aspirations.*

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*ISSF Recommendation: All currently-certified and prospective MSC tuna fisheries should conduct a joint assessment for cumulative impacts on ETP species in the Indian Ocean and prepare a joint management strategy. Echebatar is in a good position to include this approach as part of its strategy to address Condition 1 and also seek support on this task from other Indian Ocean FIPs such as SIOTI PS FIP, OPAGAC PS FIP, Mozambique and Mauritius LL FIP, Indian Ocean LL, and Indonesian Indian Ocean LL, Indian Ocean albacore LL, and Sri Lanka tuna LL.*

**Echebatar MSC Working Team :** We agree that all purse seine fisheries should be involved in a joint assessment of the various P2 components and we are working with SIOTI in developing the actions needed to consider the cumulative impacts of MSC certified fisheries on primary species. Secondary species, ETP species, habitat and ecosystem as stipulated by the standard. Thus, we are being proactive in considering the possible effects of other purse seine fisheries meeting the MSC standard on our own certificate.

That being said, it is important to differentiate between (i) meeting the MSC defined conditions for Echebatar and (ii) Echebatar work with our peer companies within the SIOTI to meet future possible changes in those conditions.

As part of our sustainability policy we are seeking to network with other tuna fisheries, and this will not only be in relation to the impact of the respective fisheries on ETP species. As yet we have nothing to report on that issue. We will however consider your suggestion within our 2020 work plan that will be drafted in December 2019.

*Conditions 2, 3, 4, and 5. PI 2.4.1, 2.4.2, 2.4.3 Habitats outcome, management strategy and information. PI 2.5.3 Ecosystem information “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 (condition 2) showing that a partial strategy is in place (condition 3) with adequate information (condition 4). And similarly, the client must demonstrate that adequate information is available to infer ecosystem status (condition 5). ISSF Comment: Same comments as for Condition 1 apply in regard to cumulative effects on habitats in relation to purse seine FAD fishery (SIOTI purse seine FIP and OPAGAC purse seine FIP).*

**EWT:** We fully recognize that by ourselves we are unable to strengthen our sustainability credentials and provide the required evidence by working independently from other SIOTI processors. This is especially the case with regard to habitats and ecosystem.

*In addition, ISSF is concerned of the lack of knowledge of the number of FADs that are being considered lost and beached by purse seine fisheries in the Indian Ocean and thus potential habitat impacts, not only in Vulnerable Marine Ecosystems (VMEs) but also in commonly encountered habitats (shore, sea bottom).’*

**EWT: We are committed to increasing the understanding of the number of FAD that are actually lost and we are working with AZTI on this aspect. we have reviewing an initial draft report from AZTI. this will be published once finalized early in 2020.**

*ISSF Recommendation: The Client Action Plan should implement a consistent FAD management strategy, including data collection and analysis, to address FAD habitat impacts, including cumulative effects with other tuna fisheries in the Indian Ocean (see previous comment).*

**EWT: We have published a Fad Management Plan. (<https://echebstar.com/wp-content/uploads/2019/10/ECHEBASTAR-FAD-Management-Plan-2020-2022.pdf>)**

*Such FAD Management Strategy could be informed by ISSF's Technical Report Technical report 2019-111 on Recommended Best Practices For FAD Management In Tropical Tuna Purse Seine Fisheries for guidance when addressing Conditions 2, 3, 4 and 5. Moreover, Echebstar FAD management plan and the Strategy and Operational Plan for a Sustainable Purse Seine Fishery in the Indian Ocean could be further developed to comply with all best practices identified in the ISSF Technical Report 2019-11 and recommendations from ISSF Technical Paper 2018-19A2 Workshop for the Reduction of the Impact of Fish Aggregating Devices' Structure on the Ecosystem. Although Echebstar FAD Management Plan follows ISSF best practices Technical Report high-level summary sections, not all best practices within these sections are covered.*

**EWT: We will review and report back**

*Below ISSF comments with regard to Echebstar actions under these best practice elements: a) Comply with flag state and RFMO reporting requirements for fisheries statistics by set type;*

*ISSF Comment: Provision of routine FAD activity and number of active FADs (including those deactivated and loss) to IOTC is essential to address the conditions of the certification. ISSF suggests that deactivated and lost FAD numbers as well as information on 100 % observers are provided to flag States and IOTC. b) Voluntarily report additional FAD buoy data for use by RFMO science bodies;*

*ISSF Comment: In order to meet ISSF's best practices for this aspect, it is recommended to provide information on position and acoustic record for the whole track or, alternatively, one position and echosounder record per day as a minimum. It is also important that fishing companies maintain buoys active to allow buoys to report at least once per day while they are in the water. c) Support science-based limits on the overall number of FADs used per vessel and/or FAD sets made;*

*ISSF Comment: Recognizing the efforts of Echebstar in reducing the FAD numbers, in order to meet ISSF's best practices for limiting the number of FADs ISSF recommends committing to actions such as (i) not activating remotely the buoys of inactive FADs in the water (ie. dormant FADs), (ii) allowing buoys to report at least once per day while they are in the water, and (iii) adopting alternative measures such as FAD closure to reduce their impact. d) Use only non-entangling FADs to reduce ghost fishing;*

**EWT: We will review and report back**

*ISSF Comment: Echebstar Action Plan states that "Since 2016, Echebstar has exclusively used non-entangling FADs" based on ISSF guide for non-entangling FADs. A new ISSF non-entangling and biodegradable FADs guide was published on August 2019 and, thus, ISSF encourages Echebstar to commit to the new definition of fully non-entangling FAD. This will allow following the best practice of Technical Paper 2019-11 to commit to using only non-entangling FADs (without any netting).*

**EWT: We will review how we may implement the ISSF guide in the process of our designing, testing and introducing biodegradable fads.**

*ISSF Comment: The Echebatar Action Plan states “Commit to removing entangling FADs that are found in the water” but the identified actions do not fully meet the spirit of ISSF best practice. ISSF encourages incorporating this in the Action Plan and to develop a plan for reducing and removing entangling FADs from the water.*

**EWT: We will review and report back**

*e) Mitigate other environmental impacts due to FAD loss including through the use of biodegradable FADs and FAD recovery policies; ISSF Comment: in relation to the best practices identified in Technical Paper 2019-11 the Action Plan does not describe specific actions to address the impact of FAD losses. For example, ISSF suggests Echebatar to work towards an early adoption of biodegradable FADs in the Indian Ocean.*

**EWT: We are fully engaged in a process to adopt bio-degradable fads**

*Moreover, ISSF encourages Echebatar to further develop good practices to reduce the loss and abandonment of FADs as described in Technical Paper 2019-11 and Technical Paper 2018-19. For example, providing FAD track data to identify areas of high incidence of stranding events and positional data on beached FADs to enable targeted recovery.*

**EWT: Currently we are working to gain a better idea on the scope of the issue. Once we have the final AZTI report we will consult on how to move forward.**

*f) For silky sharks (the main bycatch issue in FAD sets) implement further mitigation efforts. ISSF Comment: ISSF supports the adoption of the measures to reduce shark bycatch and suggests Echebatar further development of measures to ensure that silky shark mortality is mitigated.*

**EWT: We are working with SIOTI on this issue. Furthermore, in 2020 we will implement the following three activities.**

- 1. Tagging of released sharks (Provided that a tagging plan be confirmed).**
- 2. Mapping of the differences in the proportion of silky sharks caught by set.**
- 3. Correlation of the silky shark by catch with the total catch per set.**

**We are currently consulting on this and will make firm proposals in the December 2020 work plan.**

*Other ISSF comments of Echebatar’s FAD management plan: The Action Plan states: “The maximum number of FADs deployed at any one time has been reduced to 300 from 2020 onwards, with the total number which a vessel can acquire for one-year set at 500. From 2022 all FADs must be constructed of bio-degradable material.”*

*ISSF Comment: ISSF notes that 500 buoys limit not only refers to the purchase annual limit but also to the maximum number of FAD buoys in stock at any time “IOTC Res. 19/02 (paragraph 4) No purse seine vessel shall have available more than 500 instrumented buoys (buoy in stock and operational buoy) at any time”. Thus, ISSF suggests Echebatar to modify their statement to include this issue which is mandatory following IOTC Res. 19/02.*

**EWT: Noted. Please also note the Echebatar policy of unilaterally reducing the number of fads below the number allowed by IOTC, at the moment, over 2 years to a maximum of 250.**