



ISSF's comments and recommendations following Echebastar's 2nd Surveillance Audit.

ISSF is registered as stakeholder for the Echebastar Indian Ocean MSC certification, as such, we provided input into the fishery 2nd surveillance audit following the MSC process and templates. As suggested by the CAB, we wish to address our recommendations directly to Echebastar, should they consider incorporating them into their client action plan. We hope these can be useful.

Condition 9. PI 1.2.1 - Harvest strategy

As regards the Client Action Plan to meet Principle 1 conditions on the adoption of HS and HCR for IO skipjack, ISSF recommends the following specific actions that Echebastar can add to those already listed in the CAP:

- Publicly support the high-level appeals for RFMOs developed by global NGOs that are participants in the NGO Tuna Forum.
- In 2021, companies will have the opportunity to engage in other direct RFMO advocacy tactics to demonstrate market support for specific tuna sustainability asks. NGO participants in the NGO Tuna Forum will be reaching out to market partners with these opportunities in the coming months.
- Continue to advocate for accelerated progress on the adoption and implementation of management procedures/harvest strategies that include HCRs through IOTC, such as through continued direct engagement with national delegations to IOTC or through alignment initiatives with other MSC-certified or MSC-aspiring fisheries which also advocate for management procedures/harvest strategies that include HCRs for Indian Ocean tuna stocks.
- Urge the delegations of EU and Seychelles and of all other CPCs associated with Echebastar at IOTC to develop proposals for and take a strong public position on:
 - Accelerating action on updating and developing comprehensive, precautionary Management Procedures, and agree on permanent Limit and Target Reference Points for tropical tunas.
 - Conducting Management Strategy Evaluations (MSE) for skipjack
- Have meetings, calls or other direct contact with all other relevant IOTC CPC delegations where Echebastar has business interests to advocate for these points so to accelerate the adoption of management procedures/harvest strategies that include HCRs by the IOTC.
- Publicly support ISSF Position Statements that contain detailed asks on management procedures/harvest strategies that include HCRs to the virtual sessions of the IOTC in 2022 as well as IOTC future in-person meetings, and document that support (e.g. by submitting a letter or some other communication citing the Position Statement).



- Support technical work of IOTC and its Scientific Committee, as well as capacity workshops on Management Strategy Evaluation in the IO region so as to increase the leverage of IOTC members for the discussion and adoption of robust management procedures/harvest strategies that include HCRs.

Condition 10. PI 1.2.2 - Harvest control rules and tools

Same recommendations as for previous PI apply here. Additionally, ISSF recommends the following: Urgently monitor and manage catches of skipjack to ensure catches in 2021 and subsequent years do not exceed the catch limit adopted applying the skipjack tuna Harvest Control Rule specified in Resolution 16/02 as per IOTC Circular 2021-09. Thus, Echebatar could consider adopting specific harvest strategies to contribute that overall catch limit is not exceeded. For example, Echebatar could consider adopting a voluntary Skipjack catch limit for its fleet relative to the baseline of Echebatar's catches during 2018-2020.

Condition 1. PI 2.3.3 - ETP species information

Although some fisheries do not meet the MSC guidance requirements that trigger the evaluation of cumulative impacts, this does not mean that existing cumulative impacts might not be significant. This is the case of ETP species, as current guidance considers that the combined impact needs to be evaluated "only in cases where either national and/or international requirements set catch limits for ETP species". However, we consider that cumulative impacts to ETP species mortality should be assessed in reference to the species' biological limits, stock assessment results, and management advice, regardless of whether catch limits are in place or not (e.g. when management advice requests to reduce catches but catch limits are not agreed).

Since the recommendations provided by ISSF during the first surveillance, several tuna fisheries in the Indian Ocean have been MSC certified or are actively proceeding towards a full MSC assessment. Also, a number of fisheries in the Indian Ocean reached the PCDR stage in 2020 and 2021 and will become overlapping fisheries to be considered under harmonization. Thus, we encourage joining efforts among certified and prospective MSC tuna fisheries towards the assessment and development of a management strategy for cumulative impacts on ETP species and habitats in the Indian Ocean.

Conditions 2, 3, 4 and 5 – PI 2.4.x – (All habitats' PIs) and PI 2.5.3 - Ecosystem information

Same comments as for Condition 1 apply here with regard to cumulative effects on habitats from purse seine FAD fishery. In addition, ISSF is concerned by 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.

ISSF suggests complete background information is provided in the surveillance report covering the following:

General fishery description

A complete dFAD fishery description section must include information on all fishery's operations, including the use of FADs. For example, information required to correctly evaluate impacts would



include: number of FADs deployed annually, design and materials of FADs, FAD marking system used (if any), number of FAD tracking buoys purchased annually and/or average number of buoys active.

FAD management strategy

ISSF recommends that the surveillance report includes a description of the fishery's FAD management strategy. A comprehensive FAD management plan would comprise data collection and analysis to address FAD impacts on habitat and P2 species, including cumulative effects with other tuna fisheries in the Indian Ocean (see comment on cumulative impacts). Such FAD management plan could be informed by, and developed to comply with all best practices identified in, ISSF's Technical Report 2019-11 on Recommended Best Practices For FAD Management In Tropical Tuna Purse Seine Fisheries. Moreover, the fishery's FAD management plan could be further informed by ISSF Technical Report 2018-19A Workshop for the Reduction of the Impact of Fish Aggregating Devices' Structure on the Ecosystem. Although we are aware that Echebatar CAP addresses some of the FAD management issues listed below, ISSF shares below the six elements of FAD management that ISSF considers to be of utmost importance, as well as some practical examples the fishery could adopt to implement them. For further examples and recommendations, please see ISSF Technical reports 2019-11 and 2020-11.

Moreover, ISSF recommends that the client fishery develops or make public its FAD Management Plan in the line of what is required by ISSF Conservation Measure 3.7 Transactions with Vessels or Companies with Vessel-Based FAD Management Policies (effective June 2021).

(1) Comply with flag state and RFMO reporting requirements for fisheries statistics by set type Provision to IOTC of routine FAD fishery statistics (e.g. activity on FADs, number of active FADs, etc.) as per IOTC Res.15/01, 15/02, and 19/02 requirements which is essential to assess and manage the impacts of FAD fisheries. ISSF suggests that information on FAD fishery statistics, as per IOTC requirements, as well as information on observer data (100 % coverage) are provided to flag States and the IOTC.

(2) Voluntarily report additional FAD buoy data for use by RFMO science bodies In order to meet ISSF's best practices on this aspect, ISSF recommends the client fishery provides information on position and acoustic record for the whole track or, alternatively, at least one position and echosounder record per day to scientific research institutes or to the IOTC.

(3) Support science-based limits on the overall number of FADs used per vessel and/or FAD sets made In order to meet IOTC's Recommendations and ISSF's best practices for limiting the number of FADs and to strengthen the effectiveness of these FAD measures, ISSF recommends committing to actions such as (i) deploying only FADs with satellite tracking buoys, (ii) not activating remotely the buoys of inactive FADs in the water (i.e. dormant FADs), (iii) allowing buoys to report at least once per day while they are in the water, and (iv) adopting alternative possible measures such as FAD closures to reduce their impact.

(4) Use only non-entangling FADs to reduce ghost fishing

- A new ISSF non-entangling and biodegradable FADs guide was published in August 2019 and, thus, ISSF encourages fisheries to commit to the new definition of fully non-entangling FAD (without any netting) as per IOTC Resolution 19/02 requirement. This will allow following the



best practice of Technical Paper 2019-11 to commit to using only non-entangling FADs as well as to comply with IOTC Resolution 19/02

- ISSF encourages incorporating in the FAD management plan actions to reduce and remove entangling FADs from the water, including encountered FADs not owned by the fishery client.

(5) Mitigate other environmental impacts due to FAD loss including through the use of biodegradable FADs and FAD recovery policies

ISSF recommends the FAD management plan incorporates specific actions to address the impact of FAD losses. For example, ISSF suggests the fishery under assessment works towards an early adoption of biodegradable FADs in the Indian Ocean and the construction and deployment of simpler, smaller biodegradable FADs.

Moreover, ISSF encourages FAD fisheries 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 by (i) providing FAD track data till the end of their lifetime to identify areas of high incidence of stranding events, (ii) providing positional data on beached FADs to enable targeted recovery, and (iii) participating in cooperative efforts to recover FAD from the water and remove stranded FADs. The assessment report should include a detailed description of the number of FADs recovered by the fishery and the recovery strategy/plan in place and technology used.

(6) For silky sharks (the main bycatch issue in FAD sets) implement further mitigation efforts
ISSF praises the positive results obtained in recent projects to evaluate post release shark mortality, and encourages Echebatar to continue research and adoption of further measures to reduce shark bycatch. ISSF supports the adoption by the fishery under assessment of measures to reduce shark bycatch (e.g. developing and implementing a Code of Good Practices for bycatch) and suggests the fishery further develops measures to ensure that silky shark mortality is reduced (e.g. directing more effort to school sets and decrease FAD sets, avoiding small sets or with high bycatch/tuna ratio, releasing sharks from the net when safe and practical, implementing live and safe release of sharks (and rays) from the deck). ISSF encourages FAD fisheries to further test and develop shark and rays release techniques from the deck (with a special focus on big individuals) and to identify the tools/tactics used to the safe release of sharks (hoppers, stretchers, release ramps, etc.).

Other comments: 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 further developing the actions under this section of the client action plan to clarify that the measures are not limited to not placing buoys on entangling FADs, but that Echebatar also commits to retrieving any entangling FADs they encounter regardless of the frequency of these encounters.

Condition 2. PI 2.4.1 - Habitats outcome

1- "From 1st January 2021, Echebatar will voluntarily reduce the number of operational buoys per purse seiner vessel followed at any one time to 275 with a maximum annual purchase per purse seiner vessel of 475 instrumented buoys". Taking into account the significant percentage of FADs that are lost and their fate is unknown, we would recommend to evaluate if the implemented action plan would



reduce the risk of serious or irreversible harm. Also, we suggest that the strategy should be structured around specific quantitative objectives, and that more detailed information on the FAD watch program results is included as part of the surveillance report.

2- "Echebatar must provide evidence to the second annual surveillance that the plan has been fully implemented with a description of the actions undertaken". The client action plan included the use of Biodegradable FADs as a means of mitigating impacts on VMEs. We acknowledge Echebatar's participation in pilot projects to test Biodegradable FADs at this stage, and we highly encourage Echebatar to use the outcome of these trials to accelerate their transition towards the use of biodegradable FADs.

Condition 3. PI 2.4.2 - Habitats management strategy

Year 2. "Echebatar must provide evidence to the second annual surveillance that the partial strategy has been fully implemented with a description of the actions undertaken". The client action plan included the use of Biodegradable FADs as a means of mitigating impacts on VME. We acknowledge Echebatar's participation in pilot projects to test Biodegradable FADs at this stage, and we highly encourage Echebatar to use the outcome of these trials to accelerate their transition towards the use of biodegradable FADs.

Condition 4. PI 2.4.3 - Habitats information

Same comments as for Condition 1 apply in regard to cumulative effects by derelict FADs on habitats by all certified and prospective MSC tuna purse seine FAD fisheries. ISSF is concerned by the lack of data and knowledge of the number of FADs that are being considered lost and beached by purse seine fisheries in the Indian Ocean and their potential impacts on habitats.

ISSF would recommend increasing the scope of information and areas being considered for FAD habitat impacts, taking into account the numbers of FADs escaping the fishery with unknown fate. ISSF would encourage Echebatar, in conjunction with other fisheries with MSC aspirations, to collect information and evaluate if current cumulative effects of all Purse Seine fisheries in the Indian Ocean would highly unlikely reduce structure and function of habitats to a point where there would be serious or irreversible harm.