

# Fisheries Transparency Initiative (FiTI) Seychelles Feasibility Study

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## 1. Introduction

### *Purpose*

During the 3<sup>rd</sup> meeting of the FiTI Advisory Group held in Mauritania, it was agreed that the finalization of the FiTI Standards required country based feasibility studies. Two countries were chosen for these feasibility studies; the Seychelles and Mauritania.

The following document is a report back from the first of the feasibility studies. The purpose of this study was to assess any obstacles to implementing the FiTI and to provide an example of how the FiTI may work in practice. In addition, the study involved speaking to local stakeholders about the views on the need for increased transparency and the appeal of being involved in this global initiative. It is important to note that the following report is not intended to be a mock the FiTI report – it is a discussion about how the FiTI could be applied to the Seychelles and what this tells us about the design of the FiTI.

### *Methods*

The feasibility study was based on a field visit to the Seychelles between the 7<sup>th</sup> and 15<sup>th</sup> of April, as well as desk top research. Meetings were held with a range of government and non-government stakeholders (see list of people consulted in the annex) although regrettably there were several stakeholders that could not be consulted for the feasibility study due to restrictions on time and availability. Most importantly the author was not able to speak with representatives from the industrial fishing sector, although the vast majority of companies involved in large-scale fisheries do not have a permanent representative in the Seychelles, apart from their fishing agents.

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## 2. Context

The contribution of fishing to the economy of the Seychelles is among the highest in the World. In 2013 it was reported that about 10% of the adult population was employed in the fisheries and related sectors, while the contribution of fisheries to GDP has ranged from over 30% in the mid 2000s to about 17% today. It is by far the most important export earner in the country, and per capita fish consumption is among the highest in the world. Fisheries is therefore a vital sector for local food security. The Seychelles are also among the leading countries developing the 'Blue Economy', a tool that seeks to enable the transition of development models for island and coastal States towards sustainable development. While there is no universally accepted definition for the Blue Economy, for Seychelles the concept refers to those economic activities that directly or indirectly take place in the ocean, use outputs from the ocean, and put goods and services into ocean's activities and the contribution of those activities to economic growth, social, cultural and environmental wellbeing.

While this report does not set out to describe the fisheries sector in any detail, the following information puts the feasibility study for the FiTI in some context. Unlike the designated FiTI fishing categories (large-scale (industrial) and small-scale fishing), the fishing sector is categorised by the Seychelles Fishing Authority (SFA) into

- 'industrial',
- 'semi-industrial', and
- 'artisanal'.

There is no official definition of each category referred to in relevant fisheries legislation. The main characteristics of these three sectors are summarised, followed by a brief note on the post harvest sector, subsidies and penalties and fines.

### ***Industrial fisheries***

#### *Number of authorised vessels*

In the industrial sector, catches of tuna and tuna like species in the EEZ of Seychelles is divided between:

- The purse seine fleet, which comprises European, Asian and US owned vessels, and
- The long line fleet, which is made up of mainly Asian firms.

The purse seine fleet targets mostly tuna species for canning, while the long line fleet targets a wider range of species, including bill fish and sharks, and the majority of their catch is sold as frozen whole fish, or in the case shark also dried shark fin.

The number of **foreign-flagged industrial fishing vessels** paying for licenses to fish in the Seychelles has fluctuated over the past decade, predominantly because of insecurity caused by Somali Piracy, but also because of fleet restructuring in the long line sector. Thus, in 2004

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the Seychelles provided licenses to 321 long liners, and this figure dropped to a low of 31 in 2010. Since then the long line fleet operating in the Seychelles has increased, reaching 87 vessels in 2014 according to the SFA's Fisheries Statistical Report published in 2015. The numbers of purse seine vessels has not fluctuated to the same degree, with an annual average of 56 licensed vessels over the past decade. In 2015 the Seychelles authorised licenses to 45 foreign flagged purse seine vessels.

The Seychelles also has a fleet of **nationally-flagged industrial fishing vessels**, including both purse seine and long liners, who fish both in the EEZ of the Seychelles and in third countries and the high seas. In 2014 there were 36 Seychelles flagged long line vessels, 8 purse seine vessels and 5 supply vessels. Almost all of the Seychelles flagged vessels have re-flagged to the Seychelles over the past 10-15 years, and were therefore previously part of the foreign flagged fleet. Most are still owned by foreign companies registered as International Business Companies, i.e. they have owners that are registered off-shore, as can be seen by the list of Seychelles vessels published by the SFA (sent as attachment 1 to this report) However, there have been some investments by Seychellois companies in industrial fishing boats, which has added a few nationally flagged vessels owned by a majority of Seychellois investors (although these are also registered as International Business Companies).

### *Catches*

In 2014, total catches of tuna and tuna like species in the West Indian Ocean (WIO) by the purse seine fleet was reported by the Indian Ocean Tuna Commission as 277,927Mt, of which 54,601Mt is caught in the EEZ of Seychelles. The long line fleet in the WIO has become less productive than the purse seine fleet, and accounted for approximately 7,400Mt of fish in the EEZ of Seychelles for 2014.

The majority of the catch of the Seychelles flagged fleet is taken outside of the Seychelles. The Seychelles flagged fleet of long line vessels report catches in the WIO of about 10,000Mt a year, with the majority coming from the high seas and a smaller amount from other country's EEZ. Catches in the EEZ of the Seychelles amount to about a quarter of the catches for this fleet. Likewise, the total catch of the Seychelles flagged purse seine vessels for 2014 was about 60,000Mt, with approximately 17% of this declared as being caught within the EEZ of Seychelles.

### *Access arrangements*

Within the industrial sector the majority of authorised vessels operating in the Seychelles gain short-term licenses through a fisheries agreement. Licenses are issued either for a year, or for a shorter period, typically between 3-6 months.

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The European Union has held a fisheries agreement, subsequently referred to as **Fisheries Partnership Agreement** (FPA) with the Seychelles since 2003. The current agreement was renewed in 2013 and runs for 6 years. It provides fishing opportunities for 40 purse seine vessels and for 6 long line vessels, and has total reference tonnage of 52,000 tonnes a year, although the actual number of licenses taken up under the protocol and the total catches will vary from year to year; in 2013 only 22 licenses were applied for by the EU purse seine fleet in the Seychelles, and none for the long line fleet. The EU pays the Seychelles 5.5 million Euros a year (decreasing in the last 3 years to 5 million), of which approximately half is earmarked for sectoral support to the Seychelles fishing industry. A reference tonnage of 50,000Mt is set in the agreement, with additional payments due to the Seychelles if catches go above this.

Alongside the EU FPA are several other fisheries agreements:

- A bi-lateral reciprocal agreement between the Seychelles and Mauritius, which the current agreement is dated 2005 and is automatically renewed every 2 years.
- A private agreement with two Japanese fishing associations with members owning long line vessels (the Japan Agreement)
- A private agreement with the Taiwanese Deep Sea and Tuna Boat Owners and Exporters Association (the Taiwan Agreement).
- A private agreement with the Chinese Company Top Fortune for long line vessels.

In addition, there has been smaller reciprocal bi-lateral agreement with Mayotte in the past. In 2004, an agreement was signed with the EU allowing eight Seychelles flagged vessels to fish in Mayotte waters. Since 2014, vessels flying the Mayotte flag have been incorporated into the EU agreement due to Mayotte's entry into the EU.

Unlike the agreement with the EU, there are no transfers of funds to the Seychelles for the signing of the private agreements; payments are received purely through license fees. The exception may be with the two Japanese agreements, as these are known to be directly linked with a separate 'good and services' contract that is paid by the Japanese Overseas Fisheries Co-operation Foundation. These additional funds tend to be used to support fisheries development and research costs for the coastal state.

It should be noted that the use of these agreements is complex and somewhat dynamic. For example, since 2012 some Japanese owned vessels began purchasing licenses through the agreement with the Taiwanese fishing Association, because Japan's fishing authority placed a security ban on fishing in a region covering the Seychelles EEZ. It is also reported by the SFA that all Seychelles flagged long liners purchase licenses through the Top Fortune agreement, although in reports issued by the SFA there is a distinction between Seychelles flagged vessels and non-Seychelles flagged vessels operating under this access agreement,

with the former referred to as fishing under a National regime. Beyond licenses issued through access agreements, there are some private licences sold to individual boats.

### *License fees*

License fees paid by these nationally and foreign flagged vessels for fishing in the Seychelles are subject to some variation, depending on the access arrangement. It was not possible to gain complete information on license fees, although according to the 2013 Annual Report published by the SFA an annual fee for long liners was then USD24,000 (a 6 months license costing USD17,500), which applied to fishing vessels obtaining licenses through both the Taiwanese agreement and the Top Fortune Agreement. The fee for Japanese long line boats is reported to be slightly less than the fees charged for long line boats gaining access through the other agreements, although the difference is not substantial.

For purse seine boats, annual license fees for nationally flagged vessels were set at USD90,000 and USD120,000 for foreign flagged vessels operating outside the EU access agreement. Under the existing Protocol with the EU the advance payment per purse seiner is EUR38, 500, which is the equivalent of EUR55 per tonne for 700 tonnes of tuna for the first year. This fee increases over the period of the protocol to reach an advance payment of EUR 49,000, which is the equivalent of EUR 70 per tonne for 700 tonnes in the sixth year.

Income from license fees has fluctuated considerably over the last few years, reflecting changes in the number of licensed vessels and the demand for days fishing. In 2012 it was reported as SR191 million, and in 2013 the amount dropped to SR.99 million. In regional perspective, the Seychelles earns well from selling licenses, and for various reasons, the fees charged for fishing licenses in the Seychelles are generally higher than in other countries in the WIO, as described in a report on tuna fishing in the WIO commissioned by the EU in 2014:

<b>WIO country</b>	<b>Costs of access (purse seine)</b>	<b>Costs of access (longline)</b>
Comoros	9 700 - 13 000	6 300
Kenya	22 167	N/A
Madagascar	2 243 - 14 400	1 496 - 10 500
Mauritius	15 032 - 24 856	18 036
Mayotte	10 000	N/A
Mozambique	11 103 - 25 908	7 200 - 23 687
Pakistan	7 342 - 14 685	7 342 - 14 685
Seychelles	52 612 - 95 238	9 000 - 19 048
Tanzania	28 111	N/A

*Source:* Review of tuna fisheries in the West Indian Ocean, DG-MARE (2014)

All vessels requesting a license from the SFA must operate through a registered fishing agent, as stipulated through the Seychelles Fisheries Act. It is reported that there are approximately 6/7 agents that service the industrial fishing fleet. It was not possible during the feasibility study to gain an insight into the service fees and contractual arrangements between fishing companies and local agents, although this may be something relevant to the FiTI.

### *Landings and transshipment*

The Seychelles is an important country for commercial fish trade in the region, with regular transshipments of fish by industrial fishing vessels, as well as landings by purse seine vessels to supply the Indian Ocean Tuna canning factory based in Victoria. It is this trade in fish through the Seychelles that makes the fisheries sector vital for the economy of the country. Most significantly about 90% of tuna caught by the purse seine fleet in the WIO (about 250,000Mt in recent years) passes through the Seychelles. The majority of this (about 70-75%) is transhipped in port, with the remainder being used for local processing and sales (although the vast majority of this landed tuna is then re-exported as canned tuna to the EU). The importance of transshipments and trade of the long line sector for Seychelles is far less, as very few of the licensed long line vessels enter port in Seychelles - most of their catch is landed or transhipped in Mauritius, in ports in Asia and Europe, or on the high seas.

The value added from transshipments and landings makes up a sizeable proportion of the total wealth generated from fisheries for the Seychelles. Vessel expenditure in port was estimated for 2014 to be SR 2.2 billion a year, with the majority of this coming from the purchase of fuel from the Seychelles Petroleum Company. Income from selling fishing licenses comprises about 10-20% of total government revenues from the industrial fisheries sector.

### ***Semi Industrial fishing***

Seychelles has a relatively small fleet of nationally owned semi-industrial fishing boats, operating in the country's EEZ. According to the latest SFA Annual Report (2013) there have been about 9 vessels in this category and in total they report catches of tuna of about 200 – 300Mt a year. It is reported that the number of vessels operating in the semi-industrial sector may have increased recently due to interest by Sri Lankan fishing firms in developing operations in the Seychelles. This is partly stimulated by the ban of fish exports from Sri Lanka to the EU.

Traditionally yellow fin tuna and swordfish has been the main target species for the semi-industrial fleet, although restrictions on imports of swordfish by the EU due to levels of mercury contained in swordfish meat has encouraged some operators to switch to other gears to catch different species, including demersal fish. Demersal fishing by semi-industrial

boats is reported by the SFA as forming part of the artisanal fisheries, and there was an increase from 1 boat operating in this way in 2011, to 5 by 2015. This approach to reporting semi-industrial fishing as forming part of the artisanal sector depending on gear type or species targeted highlights definitional ambiguity in the Seychelles fisheries sector, which would be significant for the FiTI reporting.

### ***Artisanal fishing***

Artisanal fishing includes several methods and gear types, ranging from different types of small boats to fish traps to catches made by fishers on foot. On average there are about 425 fishing boats operating in the artisanal sector, although precise numbers of total fishers, including those catching fish on foot and with traps is not available.

The Seychelles does not operate a quota system for the artisanal sector, nor does it restrict entry, although a nominal license fee is required and fisheries are encouraged to register with the SFA. However, artisanal fishing is restricted in protected areas and there are more regulated fisheries for both lobster and sea cucumbers.

The lobster fishery is regulated through a closed season that is announced on an annual basis, informed by surveys of stock status. The open season can be anywhere between one to three months. Licenses are restricted, and in 2013 licenses were given to only 8 fishers.

The sea cucumber fishery has grown substantially since the mid 2000s, due to increasing demand from Asia. Unlike most other forms of artisanal fisheries, it is almost exclusively based on exports (mainly Hong Kong and China). There has been an increase in the total captured, up to 642,404 in 2011, although since then reported catches have been on the decline. The fishery is quite valuable, with the value of exports in 2014 estimated to be SR41.1 million. Fishers targeting sea cucumber, who number about 140, have formed the Association of Members of the Seychelles Sea Cucumber Industry, and are collaborating with the SFA to improve data collection.

Total catches from the artisanal fisheries has fluctuated over the past few years, with an increase from 2,500 Mt in 2012 to 4,143MT in 2013, falling to 3,632Mt in 2014. Part of this fluctuation seems to be the inclusion of semi-industrial fishing boats that have switched from long lining and their resulting catches of demersal fish are included in the statistics for artisanal catches.

### ***Post harvest sector***

The post harvest sector in Seychelles is dominated by the tuna canning industry, which produces about 35,000Mt of canned tuna a year for export to the EU, valued at SR 4,061



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million in 2014 (approximately USD338 million). There is only one tuna canning company in Seychelles, now majority owned by Thai Union. It employs over 2,500 people, of which about 60% are foreign workers. Unfortunately it was not possible to gain data on the gender distribution of employment, or on wages paid. Two smaller fish processing factories in the Seychelles are owned by Oceana and Sea Harvest, although it was not possible to gain data on their production and employment either for the feasibility study.

Almost of all of the tuna caught by the industrial sector is therefore sold abroad, either through direct landings in other countries or through canned tuna exports. In recent years there has been a policy to encourage more landings of by-catch from the purse seine and long line boats to be made available for local consumption and processing, although data on this is not comprehensive and requires further work to obtain by the government. The extent to which this new policy will enhance national food security is important, although there may be concerns with the by-catch undercutting sales from the artisanal sector. It therefore may become an important aspect for local stakeholders to monitor.

For the time being, artisanal fisheries (including the semi-industrial fishing vessels targeting demersal) supply the majority of local fish for direct human consumption. Post processing is limited, although it appears to be a widespread ambition in the sector to invest in more capacity to add value to fish products, including providing larger quantities of packaged frozen fish fillets and dried or preserved fish.

In addition the post harvest sector in canned tuna, Seychelles also has significant exports of other fish products, including fishmeal and fish oil, as well as exports of fish from the artisanal and semi-industrial sector, including swordfish, sea cucumbers and dried shark fin.

### *Imports*

The Seychelles trade data on fish shows that it imports far more than it exports. Indeed, the Seychelles official data shows imports of frozen fish (predominantly tuna) of about 77,000Mt in 2014, while total exports of fish were estimated in the same year to be 36,983Mt. Thus, the Seychelles is a net importer of fish. However, this high level of import represents purchasing of tuna by the tuna canning factory from non-Seychelles flagged vessels, which is then re-exported to the EU. The discrepancy between imports and exports of tuna is also due the fact that as tuna is processed, the volume of exported products (cans) is lower than the imports of raw material.

### *Subsidies*

There are several forms of subsidies provided to the fisheries sector in Seychelles. These include:

- Preferential interest rates on loans for the purchase of fishing vessels and gears.

- Fuel subsidy, operated through a voucher system, provided to fishers registered with the SFA.
- Preferential trade tax and duty free fuel for semi-industrial boats targeting tuna and swordfish, as well as rebates and non-payment of import duties for fishing bait, equipment and fishing gears.
- Provision of subsidised ice.
- Exemptions for companies registered with the SFA for purchasing work permits for foreign employees.

It was not possible to obtain total figures of the value of these subsidies. It does not appear to be covered in a systematic way in existing publications of the SFA, although some data analysis is being undertaken within the economics department of the SFA and could become available.

### ***Penalties and fines***

Although not published, the SFA was able to provide a summary of penalties and fines for fisheries offences. The information is summarised in annex 2.

### 3. The extent of transparency

The Seychelles, through the SFA, provides quite comprehensive data on fisheries and can be considered strong in terms of transparency compared to other African States. The SFA has dedicated staff for data collection and dissemination and the SFA website contains lists of authorised vessels (although it is not clear whether these are complete, see below). Comprehensive information on fisheries is published in an Annual Report, although the publication of this has experienced some delays (the most recent report is for 2013). However, more in-depth and up to date analysis has been provided through the 2015 Fisheries Statistical Report published by SFA. SFA were also able to provide a list of offences and penalties/fines in the fisheries sector.

Improvements to transparency have been made over the past few years. This has been influenced by conditions agreed by the government of the Seychelles through the World Bank's 'Sustainability and Competitiveness Development Policy Loan', amounting to 21 million spread equally over three years. In the first of three annual programme documents, lack of transparency in the fisheries sector was highlighted as an area for reform:

*“Bank’s analytical works undertaken between 2008 and 2011 illustrated weakness in the fisheries statistic system, insufficient transparency and weak accountability. In 2008 the works established the detrimental economic impact of an opaque and unbalanced shareholder agreement between the Government and the local tuna cannery private operator. In 2011, Bank’s analysis illustrated the weak harnessing of some foreign fleets to the national economy and limited economic returns due to inadequate financial arrangements, suggesting that Seychelles lost potential revenue for many years. Both works identified needs for improving data collection and transparency mechanisms to inform policy debate and design. Anecdotal information suggests that poor governance deterred foreign operators to invest in Seychelles in the past.”*

The objective of the World Bank programme was to support the SFA with an improved Fisheries Information System, and to disclose to the public data on fish licenses and access agreements. It was also described that the SFA should address confidentiality clauses in its access agreements that inhibit transparency, ensuring that the government undertakes to gain consent from necessary foreign partners to disclose information in existing agreements, and that all new access agreements contain a provision for mandatory disclosure of the contents of the agreement on the SFA’s website.

These conditions have been largely met, which is confirmed in the third programme document provided by the World Bank in 2014. The SFA established an improved Fisheries

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Information System and began publishing data on fishing licenses and agreements. A full list of fishing licenses for the industrial sector, including information on the owner of the vessel, vessel characteristics and dates of fishing authorisations, was published in a national newspaper, and are now made accessible through the SFA's website.<sup>1</sup> The same data does not appear for the semi-industrial sector.

However, there is still difficulty in publishing the texts and contents of all access agreements. The Japanese, Taiwanese and Top Fortune agreements remain confidential and the texts of these agreements is not added to the SFA website. Only the text of the bi-lateral agreement with Mauritius is on the SFA website. The EU agreement is not published by the SFA either, but this can be found through the European Commission's website.

Although the SFA has not been able to meet the requirements of the World Bank on access agreement disclosure, there is a commitment by the SFA and the Ministry of Trade, Finances and Blue Economy to address the confidentiality of the Asia agreements. The failure to do this yet is explained by the fact that the agreements have not been renegotiated. The Seychelles has preferred to allow these to continue, partly because worries over piracy persist and this may reduce the bargaining power of the Seychelles, resulting in lower revenues. In addition, the agreement with Japan remains dormant given that the Japanese government still has in place a security ban for its fleet of long line vessels to operate in the Seychelles EEZ. Nevertheless, these agreements are up for renewal, and it has been described that the publication of the text of the agreements will be raised in the negotiation process. It should be appreciated that the SFA already discloses information on its website about the vessels and their owners fishing under the Asian agreements, and this has not raised any objections from Asian companies. Moreover, it was described that the text of the agreements are far less elaborate than the agreement with the EU, and do not contain any provisions for additional payments beyond license fees. It is therefore possible that foreign partners may not object to the publishing of these agreements.

While the World Bank did not request the publication of certain **disaggregated data** at the vessel level, this has been an expectation of members of the Advisory Group for FiTI. The SFA does provide specific details on vessels and their ownership for both Seychelles flagged vessels and foreign licensed industrial vessels. There are some anomalies in reporting where the owner of the vessels are in fact the vessel's local agent. What is more, while the vessel lists contain information on the company that owns the vessel, the SFA does not publish information on the beneficial owners.

What is also not published is disaggregated data on payments and catches. The SFA does publish disaggregated data to some extent – providing a breakdown of catches and payments according to countries and fishing fleets (purse seine/long line). However,

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<sup>1</sup> These can be viewed at: <http://www.sfa.sc/publication.jsp> - Semi-Industrial and Foreign Flagged Vessels.

requests were made during the feasibility study to gain access to catch and payment data on a per vessel basis, and while this is collated electronically by SFA, due to confidentiality clauses the SFA was not able to share this information.

### ***Fisheries policy and status of stocks***

There is quite sparse information published by the SFA on fisheries management plans and the status of commercially targeted stocks. For the industrial sector this information is generated by the Indian Ocean Tuna Commission, with Seychelles being an active member.

Fisheries management planning in coastal areas is being undertaken for key commercial species, including lobster and sea cucumbers (although there is limited information on this published by the SFA on its website), but there seems to be a lack of a more comprehensive management plan for coastal fisheries. The SFA, in partnership with UNDP, has therefore recently embarked on formulating a fisheries management plan for the Island of Praslin. This is considered to be a pilot study that will lead to a more comprehensive approach to monitoring and managing coastal fisheries off Mahe and other islands. The pilot case study is reported to have been approached with active participation by artisanal fishers and fish processing firms, and it is paving the way for new forms of community co-management arrangements. The resulting plan will be subject to approval by the Cabinet, and will inform a proposed new Fisheries Bill. The SFA is therefore in the process of improving its information and management planning for coastal fisheries, and this will be extremely important in strengthening participation in and public awareness of fisheries management.

The SFA is engaged in various research projects that inform fisheries policy, including stock assessments and monitoring of lobsters, reef sharks, sea cucumber and the impacts of climate change. Only limited publications from these research projects are available on the SFA website, and more is available in hard copy at the SFA's document's centre.

### ***The quality and reliability of information***

#### *Accessibility*

Certain stakeholders interviewed for the feasibility study claimed information on fisheries is still hard to obtain, meaning there is a perception that the SFA is not entirely transparent or efficient in sharing information. This was a view expressed by some civil society organizations, as well as by staff in other Ministries. However, while the SFA's website is somewhat difficult to navigate, it is hard to agree that the information is not available. The problem may lie with the potential users of the information not being aware of the data, or continuing to hold a perception about low levels of transparency from previous years. Moreover, the presentation of fisheries statistics is contained in technical reports that may not be so accessible to certain people, including fishers. Indeed, there was a view held by

staff in SFA that publishing lists of licensed vessels in the national newspaper, as requested by the World Bank, caused some confusion, as many people did not fully understand the relevance of this information.

### *Reliability*

In terms of the reliability of published information, data on catches by the industrial sector provided by the SFA is entirely reliant on reports sent by the fishing vessels, as there is very limited independent observer coverage. As indicated in the Seychelles annual reports and other technical reports, not all licensed vessels submit complete log-books, although the trend seems to be improving and reporting by EU vessels is 100% as these reports are used to finalise invoices for license fee payments. Nevertheless, information on catches by the industrial sector fishing in its EEZ compiled by the SFA is unlikely to be entirely reliable. Information on landings, including from both the industrial and semi-industrial fisheries sector is subject to greater oversight and is likely to be more reliable than data on catches.

It was not possible for the feasibility study to assess the extent to which information on licenses and payments made by industrial and semi-industrial fisheries is verified as accurate through an independent audit, although the SFA is subject to annual audits undertaken by a leading private auditing firm, and subsequent reports are subject to oversight by the governing board of the SFA and the parliamentary committee on finance and accounts. However, published information on licenses appears to be incomplete. There appears to be a discrepancy between the information on the number of licensed long line vessels operating in the Seychelles contained in the 2015 Fisheries Statistical Report (123 long line vessels, p.58), and the number of licensed vessels included in the list of licensed vessels published on the SFA website (74 long line vessels). And within the Fisheries Statistical Report there is different data on the list of licensed vessels – set at 142 long line vessels in the narrative of the report (p.52) but 123 vessels in the data table presented (p.58). The available information on licenses is therefore somewhat confusing. However, this can be explained by different methods being used to count fishing licenses. The Fisheries Statistical report list the number of individual licenses sold, and some vessels may purchase several different licenses each year. Clarifying these methods and improving the labelling of data could resolve any confusion.

The SFA describes some difficulty in obtaining information on landings and port activities of industrial fishing fleets. This is due to some fisheries agents not co-operating with disclosing information on activities and expenditures of their clients, and is described as particularly problematic for sections of the Asian long line fleet.

The government's data on small-scale sector activities is relatively in-depth and derived from credible research methods. There is regular collection of data by SFA staff at key landing sites in the three main Islands of the Seychelles (statistics are gathered on a daily

basis at the main landing sites). The Seychelles therefore has good baseline data on the numbers of small-scale fishers, their catches<sup>2</sup> and contribution to food security. However, ecological analysis that could highlight overfishing is not comprehensive, although as noted, there are several research projects that help inform fisheries planning.

Despite the positive situation with data gathering by the SFA, the Seychelles has a lack of independent research provided by academia or research institutes, which means verification of data produced by the government is not occurring to a great extent. This may be helped by the work of the newly formed Blue Economy Research Institute (BERI) at the University of Seychelles, who are embarking on a programme of work on fisheries and marine ecology initiated with a grant from government. The indications are that BERI will receive further funding from bi-lateral donors, as well as the Commonwealth Institute, which will help provide further information on the state of fisheries in the Seychelles, including on social and environmental aspects.

### ***Obstacles to transparency***

While the Seychelles has made progress on transparency in fisheries, there are some obstacles. The existing Fisheries Act of Seychelles mandates the SFA to collate comprehensive information on licensed operators, thereby satisfying the requirements of the key reporting elements identified by the FiTI Advisory Group. However, there is nothing in the Fisheries Act that clarifies public access to this information.

The Constitution of the Seychelles (Article 28) does provide for freedom of information, which could be applied to a range of data on fisheries. However, the country lacks legislation that would make this right available to citizens in practice, i.e. there is no Act on Access to Information.

This situation has raised concern among the government and several non-governmental organisations, and is being addressed in the Human Rights Action Plan led by the Seychelles National Human Rights Commission. It is expected that the Seychelles will establish a law on access to information in the coming years. Furthermore, in the “Seychelles Strategy 2017”, under “Government Restructuring and Business Facilitation”, there is a commitment to improve intra-government communication through the introduction of an IT network that will link civil servants within departments and across ministries. It is also an objective to use this system to offer the public reliable 24-hour access to government information through the computerisation of the Registrar General’s office. In essence, there are signs that access to information will be strengthened and this may create a stronger enabling environment for further consolidating transparency in fisheries.

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<sup>2</sup> Some stakeholders did note that some fish is landed at night when inspectors are not present, although this does not seem to be a major concern.

However, an important obstacle to achieving transparency at the level aspired to through FiTI lies with **confidentiality clauses** contained in access agreements, as well as the confidentiality policy used by the IOTC for tuna fisheries. Article 10 of the Fisheries Agreement with the EU states:

*“Both Parties shall ensure that only aggregated data related to fishing activities in the Seychelles’ waters shall be made available to the public domain, in conformity with the provision of the appropriate IOTC resolution. Data which may be considered as otherwise confidential shall only be used exclusively for the implementation of the Fisheries Partnership Agreement and for the purposes of fisheries management, monitoring, control and surveillance with the relevant competent authorities.”<sup>3</sup>*

The IOTC resolution mentioned in this Article is the “Resolution on Data Confidentiality Policy and Procedures”,<sup>4</sup> which was last amended in 2012. The key text of this resolution reads:

*“Catch-and-effort and length-frequency data grouped by 5° longitude by 5° latitude by month for longline and 1° longitude by 1° latitude by month for surface fisheries stratified by fishing nation are considered to be in the public domain, provided that the catch of no individual vessel can be identified within a time/area stratum. In cases when an individual vessel can be identified, the data will be aggregated by time, area or flag to preclude such identification, and will then be in the public domain.”*

The purpose of these confidentiality clauses is to protect the commercial interests of fishing firms. In particular, the publication of disaggregated catch data is prohibited due to the concern that this information can be used by other fishing firms, perhaps to identify where their competitors are doing well.

The extent to which these agreements on confidentiality inhibit the publishing of disaggregated data remains moot. It is ambiguous whether Article 10 of the EU’s Fisheries Agreement with the Seychelles applies to financial information, and the IOTC resolution is clearly concerned with catch data only. Therefore it may be permissible for the SFA to publish disaggregated information on financial payments if it wants to.

Moreover, the confidentiality clause contained in all EU Fisheries Partnership Agreements is likely to become redundant if the EU finalises the proposed Fisheries Authorisation

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<sup>3</sup> [http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:22014A0109\(01\)&rid=86](http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:22014A0109(01)&rid=86)

<sup>4</sup> Available at: <http://www.iotc.org/cmm/resolution-1202-data-confidentiality-policy-and-procedures>



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Regulation. This requires EU flagged vessels to report detailed information on an annual basis about catches and payments in third country's waters to the European Commission. It is likely that this data will be published, or at least obtained by civil society through access to information requests. This will have a knock-on effect for RFMOs who will come under pressure to develop policy that provides an even playing field. Nevertheless, for the time being, data confidentiality as regulated by the EU and RFMOs does pose an obstacle to achieving the levels transparency aspired to through the FiTI for the Seychelles.

Finally, there are also legal obstacles in the Seychelles for publishing information on beneficial owners and the payment of taxes by fishing and fish processing companies. It should be noted that many of the companies involved in fisheries are registered as International Business Companies, that have no tax obligation in the Seychelles are afforded a strong degree of confidentiality.

#### 4. Stakeholder perceptions on transparency and the FiTI

The impression gained through the feasibility study is that FiTI is well supported in the country. A recurring theme is that the FiTI is highly compatible with the government's new work on the *blue economy*, and that it is vital to have good levels of transparency and participation for this new thematic focus for government. There were, however, some concerns and suggestions for revising the approach for the FiTI.

##### ***Scope of FiTI reporting***

Stakeholders were given brief presentations about the FiTI and invited to comment on its scope. Several people spoken to for the study in the Seychelles suggested the FiTI should include additional information. This fell into two main categories:

##### A) Information on employment and labour conditions:

There is some concern in Seychelles about the conditions of employment for Seychellois on-board semi-industrial and industrial fishing boats. The Ministry of Labour and Human Resources Development is undertaking a review of the quota system in place for the fisheries sector (the % of foreign workers that are allowed to be employed by local firms), and is also interested in reviewing the labour laws for fisheries - there is nothing in place at the moment that is specific for fishers, and fishers are therefore governed by national labour standards, including a minimum wage and restrictions on working hours. The interest in reviewing this situation is partly motivated by a realisation that fishers are having to spend greater time at sea and that there is a downward pressure on labour practices caused by the employment of cheaper labour from Asian countries. Health and Safety on fishing vessels is regulated by the Seychelles Maritime Safety Organisation, although this agency does not seem to cover the inspection of labour laws. The question was therefore posed whether FiTI could help report on the quality of employment on fishing boats and compliance with relevant national labour laws and international conventions applicable to labour standards for fish-workers. It was not possible to discuss this in any detail, and to gain clarity on whether such information should be focussed on Seychelles flagged vessels (industrial and semi-industrial) and vessels employing Seychelles crew, or extended to all vessels provided with a fishing authorisation by the SFA (including some that will not visit port or employ Seychellois fishers).

##### B) Information on development projects:

Some people interviewed for the feasibility study raised an interest in better understanding fisheries and marine conservation projects funded by development aid partners and international NGOs. There was a complaint that the process of developing and implementing projects has not always been transparent and participatory. An example was

the use of sectorial funds provided by the EU through its fisheries partnership agreement, which are governed by a joint committee between the government and the EU. Information on the impacts and financial audits of these funds are not disclosed. Likewise, while Japan is known to provide aid for fisheries management and development (including funds provided through 'goods and services contracts' adjoining access agreements), there was a view that the purpose of this funding was not widely understood. Furthermore, there was some dissatisfaction over the extent of participation and transparency with the recent 'debt for nature swap', which has resulted in a sizeable fund for marine conservation work (approximately \$28 million). Fishers organisations were initially not included on the committee overseeing the allocation of these grants, but have managed to be included now. Others felt that there was a lack of co-ordination and consultation with other civil society groups, and an opportunity for greater information sharing with platforms such as the Citizens Engagement Platform. It was therefore proposed that FiTI could include mandatory reporting on fisheries related projects, including programme documents and outcomes of any performance audits.<sup>5</sup>

### ***Concerns & Recommendations***

While the overwhelming view was in support of transparency, a question posed about FiTI is whether this could have negative implications for investors. If Seychelles insists on high levels of transparency with foreign fishing firms, will this scare off investors and provide a competitive advantage to other African states that are not insisting on transparency? This concern primarily related to the use of the Seychelles as an important transshipment and processing country for tuna, for which it faces competition from Madagascar, Mauritius and other West African states, such as Ghana. It was therefore requested that those supporting the implementation of the FiTI provide assurances that it will not cause negative impacts on investor's decisions. Moreover, it was noted that Seychelles should not remain the only coastal country in the region that commits to such high levels of public disclosure.

There was also apprehension over the creation of another multi-stakeholder committee. As a small island state with quite high levels of development aid, many people in government and the NGO sector are confronted with regular meetings and participation on several committees set up through development aid projects. Some of these processes overlap and many appear short lived, while the work required for these initiatives eats up time for other responsibilities, and can be costly, particularly for fishers who may not be adequately compensated for their time. While this concern did not cause a rejection of the FiTI, it did lead to the recommendation that the national multi-stakeholder group should be planned

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<sup>5</sup> It was not possible during the feasibility study to meet with the department in the Ministry of Trade, Finances and Blue Economy that has the mandate to oversee projects (the key staff members were abroad). It is therefore unclear whether there is already a system in place to collate and publish this type of information, and if there is work underway to strengthen participation and oversight.

carefully, and that the potential to integrate this into other existing initiatives should be explored. A proposal was to integrate the FiTI with the EITI in Seychelles, although most people spoken to on this were not in favour, partly because momentum for EITI has slowed given declining investments on oil and gas exploration in the country, and that the EITI and the FiTI are dealing with quite different data and stakeholders. But there was support for seeing the FiTI integrated into a multi-stakeholder process that may emerge from the government's work on the *blue economy*, as well as participatory process being piloted for the production of fisheries management plans.

Another reservation about FiTI was whether the initiative will reveal anything new about the management and status of the fisheries sector. If the reporting elements remain focused on fishing activities, then Seychelles is already publishing much of this information. The impact of adding disaggregated data to the data already published by SFA may be modest, and therefore expectations about the impact of the FiTI should not be exaggerated. Discussions on this revealed several further important points:

A) It was recognised that the value of the FiTI may not lie in revealing more data, but it could help improve the publicity of this data among governments and other non-government stakeholders. The reforms introduced by the World Bank may not have the intended impact of stimulating public discussions and accountability on fisheries, because the disclosure of new data has been approached as a technical requirement, rather than as part of a wider initiative to improve intra-ministerial and public debate. It was suggested that data disclosure in fisheries would be more effective if it was given a specific event or platform, and perhaps FiTI working in support of the *blue economy* could help achieve this.

B) It was argued that simply publishing more detailed data may not lead to better understanding of key policy issues for the country. Parliament, for example, will not be supported by FiTI to extend their contribution to policy debates if it begins and ends with publishing details of the activities of fishers. The data by itself may lack meaning and impact and there was concern that the country lacks the institutions and resources to undertake further analysis of this data. FiTI should therefore support greater analysis of the data to enable pertinent questions about the exploitation and management of marine fisheries to be better understood, including on sustainability and value added to the economy and food security. In other words, FiTI should not limit itself to just publishing raw data. Furthermore, it was noted that the national multi-stakeholder group should have a wider mandate than fact checking, and should be involved in agreeing on priorities for how the data is interpreted.

C) It was noted that the idea of publishing separate FiTI reports in the Seychelles may duplicate what is already being published in the SFA Annual reports. Is a separate FiTI report

necessary and should the reporting mandated by FiTI be integrated into the existing annual report?

### 5. Conclusion

The Seychelles is commonly perceived as being among the transparency leaders of fisheries countries. Although the reporting elements for the FiTI have yet to be decided on, the SFA already collates, in digital format, substantial information on fisheries, including on the artisanal sector, the post harvest sector and trade. There are possible anomalies to the published data, which require it can therefore be assumed that the Seychelles would therefore be able to collate and publish data for the FiTI without considerable costs and extra resources. The situation may change with expanded reporting, particularly on beneficial ownership, employment and labour conditions. However, at least on the latter two, there is interest from both the Bureau of Statistics and the Ministry of Labour and Human Resources Development to gather this information, which could negate the need for extra resources for FiTI reporting.

There is also strong political will for the FiTI in the country, given its good fit with the government's drive to develop the *blue economy* concept. There is also progress on participative fisheries management, as well as credible representative bodies for fishers and civil society platforms. The notion of utilizing multi-stakeholder structures as a credible discussion platform, as established by a FiTI National Multi-Stakeholder Group, was therefore mentioned positively various times, notwithstanding some reservations over creating too many committees in the Seychelles.

The main obstacle for the FiTI in Seychelles is currently the restrictions of data disclosure imposed through its fisheries agreements. There are two elements to this.

1. The Asian agreements are currently classified as confidential, so the text of these agreements is not published on the SFA website. Overcoming this situation does not seem to be a major challenge, and it is reasonable to expect the Asian agreements will be disclosed following the renegotiation of these agreements, or sooner if the SFA gains the consent from foreign partners to publish the existing agreements.
2. The EU agreement and the IOTC resolution also include confidentiality clauses. The result is the SFA will not publish disaggregated catch and payment data, although these confidentiality clauses do not seem to have any bearing on publishing financial information.

A second obstacle lies with collaborating with the industry, particularly the industrial sector. It was not possible to gain an in-depth understanding of this, but it seems that the industry, including the companies owning Seychelles flagged vessels, have a limited physical presence in the Seychelles. A lot of their activities are co-ordinated by fishing agents. To what extent representatives from the industrial sector would be able and willing to engage with a multi-

stakeholder group for FiTI is therefore unclear. We cannot be sure that the industry would be active in the multi-stakeholder process, and it would be important to communicate FiTI to the industry organised through European and Asian associations. Meetings of the IOTC could provide an opportunity to hold a side event on FiTI to serve this purpose.

### ***What the feasibility study reveals for the design of the FiTI Standard?***

There are several observations about the design of the FiTI Standard that can be drawn from the Seychelles study:

#### *A) Confidentiality of fisheries catch and financial data.*

The FiTI needs to have an approach to the confidentiality of fisheries data. The case for classifying this data as confidential in order to support the interests of fishing firms has not been argued extensively, and the FiTI may want to engage both the EU and RFMOs on better understanding the concerns of publishing this information. This discussion needs to understand whether publishing annual catch and financial data on payments for an individual vessel will lead to any loss of competitive advantage. Moreover, it could be important to establish that the public interest in this regard may be greater than the commercial interests of firms. Nevertheless, we may find that this debate is influenced, if not resolved, by the finalisation of the EU's Fisheries Authorisation Regulation. Alternatively, the FiTI advisory group may want to (re)consider whether disaggregated catch data is essential?

If the reporting elements of FiTI include taxes, as well as details of beneficial ownership of fishing companies, then the challenges posed by confidentiality of information may be even greater.

#### *B) Scope of reporting*

The views of people interviewed in the Seychelles provided a useful contribution to the final decision on the scope of the FiTI reporting elements. There was widespread support for including data on small-scale fisheries, and there was no objections raised about including data on the post harvest sector and trade, as well as subsidies. Much of this data is already being published by the SFA, with the exception of subsidies. But the feasibility study revealed interests in including information on employment and labour standards, as well as development aid projects - two areas that have been mentioned before by members of the FiTI Advisory Group. A key decision remains whether these aspects should be included under mandatory reporting (either as numeric, aggregable data or as more descriptive, contextual information), or allowed to be included as 'optional extras' agreed to by the national multi-stakeholder groups.

### *C) Data Analysis*

The Seychelles study reveals the importance for local stakeholders of how information is used. The value added of the FiTI will most likely be in how the data is compiled and used, rather than from the disclosure of raw information. This suggests that the FiTI could do more than fact checking, and may want to consider elaborating on how data can be used to understand a range of priority issues. This appears to be what several stakeholders in the Seychelles want. However, the risk here is that FiTI reports may slide towards advocacy reports containing subjective and potentially biased interpretations. A tension therefore exists between producing objective facts, which are potentially meaningless or not accessible to many people, and producing reports that attempt to answer key questions that are vulnerable to subjectivity.

### *D) Role of the national multi-stakeholder group*

The feasibility study raised questions about the role and purpose of the national multi-stakeholder group. An important finding is that there is limited appetite in the country for another committee, and the desire to see the multi-stakeholder group integrated into an existing or emerging platform – most likely related to the blue economy work. Of course, this may not be the same for other FiTI countries, where there is more interest for a stand-alone group. This suggests the need for some flexibility in designing how FiTI works at the national level.

### *E) Data dissemination*

Finally, we see in the Seychelles that the SFA already publishes substantial information through its website and annual report. The SFA has also started publishing comprehensive information through its Fisheries Statistical Report. If the FiTI requires its own national report, then this may overlap or duplicate what is already being done. The Seychelles is most likely an exception here (many other countries do not match the Seychelles in terms of the quality of its fisheries reporting). Nevertheless, the FiTI may need to be tailored to avoid duplication of reporting or it needs to justify why another stand-alone report for a country such as the Seychelles is needed.



**Annex**

***1. List of people consulted***

<b>Name</b>	<b>Position/Organisation</b>
Philippe Michaud	Special Advisor to the Minister (Finance, Trade and the Blue Economy) & Chairperson of the Seychelles Fishing Authority
Peter Purvis	Legal Advisor, Ministry of Finance, Trade and the Blue Economy, Blue Economy Department
Dominique Benzaken	Senior Ocean Governance Advisor, Ministry of Finance, Trade and the Blue Economy
Vincent Lucas	Chief Executive Officer, Seychelles Fishing Authority
Roy Clarisse	Deputy Chief Executive Officer, Seychelles Fishing Authority
Karine Rassool	Senior Economist, Seychelles Fishing Authority
Yannick Roucou	Seychelles Fishing Authority
Finley Racombo	Special Advisor to the Minister (Fisheries)
Roger Denousse	Advisor, Ministry of Fisheries and Agriculture
Captain Joachim Valmont	Director General, Seychelles Maritime Safety Administration
Laura Ah Time	Chief Executive Officer, National Bureau of Statistics
Dolor Ernesta	Vice President, Seychelles Chamber of Commerce and Industry
Juliette H Sicobo-Azais	Secretary General, Seychelles Chamber of Commerce and industry

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Marie-Therese Purvis	Chairperson, Sustainability for Seychelles
Marcel Rosalie	Chief Executive Officer, Citizens Engagement Platform
Hon. Charles de Commarmond	National Assembly, Standing Committee (Finance & Accounts)
Hon. Nichole Barbe	National Assembly, Standing Committee (Finance & Accounts)
Hon. Marc Volcere	National Assembly, Standing Committee (Finance & Accounts)
Hon. Sebastien Pillay	National Assembly, Standing Committee (Finance & Accounts)
Angelic Appoo	National Assembly, Director General (Finance & Accounts)
Fabio Fiorellato	Indian Ocean Tuna Commission, Fisheries Officer
Virginie Lagard	Seychelles Fishing Boat Owners Association
	Ministry of labour and Human Resources Development

**2. List of offences**

<b>Date</b>	<b>Name of Vessel</b>	<b>Nationality</b>	<b>Offence</b>	<b>Position</b>	<b>Number of Crew</b>	<b>Result</b>
<b>03<sup>rd</sup> October 2012</b>	Lucky Too	Sri Lanka	Fishing inside the Seychelles Waters without a valid fishing licence	Seychelles Island Amirantes Group	6	Court order-public auction of f/v-SR.160,000
<b>22<sup>th</sup> February 2014</b>	Coyotte	Malagasy	Fishing inside the Seychelles Waters without a valid fishing licence, Fishing sea cucumber, processing sea cucumber without a license	Cosmoledo Atoll	15	SR. 1,500,000
<b>22<sup>th</sup> February 2014</b>	MitsioII	Malagasy	Fishing inside the Seychelles Waters without a valid fishing licence	Seychelles Island Amirantes Group	11	SR. 1,500,000
<b>16<sup>th</sup> December 2014</b>	Maliki	Iranian	Fishing inside the Seychelles waters without a valid fishing license.	100nm South East of Mahe Island within the Seychelles	18	Court order-public auction of fish-compounding of offence in amount USD 45,000
<b>16<sup>th</sup> December 2014</b>	Maoullai	Iranian	Fishing inside the Seychelles waters without a valid fishing license.	100nm South East of Mahe Island within the Seychelles	18	Court order-public auction of fish-compounding of offence in amount USD 45,000
<b>27<sup>th</sup> September 2015</b>	Sao Vahiny	Malagasy	Suspected of fishing inside Seychelles waters without a valid fishing license.	Seychelles waters	14	Court order to sell good and dispose of bad sea cucumbers-Rs. 30,256.50 received from Morin Group – Court order to auction the vessel and

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						gears (auction scheduled for 31 <sup>st</sup> March), vessel did not sell, another auction to be scheduled.
<b>27<sup>th</sup> September 2015</b>	Bordeur	Malagasy	Suspected of fishing inside Seychelles waters without a valid fishing license.	Seychelles waters	15	Related to the above, Court order to sell good and dispose of bad sea cucumbers- Rs. 30,256.50 collected- Court order to auction the vessel and gears (auction scheduled for 31 <sup>st</sup> March), vessel did not sell, another auction to be scheduled.
<b>17<sup>th</sup> November 2015</b>	Dar Long Chang No2	Taiwanese	Fishing within restricted zones within the Seychelles waters	Armirantes and Farquhar Groups	25	Settled outside court, Compounding of offence for Rs. 1,250,000.
<b>December 2015</b>	5 vessels	Comorians	Suspected of fishing within restricted zones within the Seychelles waters	Aldabra Group	19	Each captain Charged Rs1000 because they are persons of limited means, Court order to auction the fishing vessels and gears used. (Vessels still on Aldabra)