



Fisheries
Transparency
Initiative

Validation of the Republic of Seychelles

**Compliance Statement
of the FiTI International Board
regarding progress in implementing
the FiTI Standard (April 2020 – December 2021)**

Date: 15 February 2023

Purpose of this document

The FiTI holds all FiTI implementing countries accountable to the same global standard by conducting regular **validations**, which assess an implementing country's compliance with the FiTI Standard per section D of the Standard.

The **FiTI Standard** is the only internationally recognised framework that defines what information on fisheries management should be published online by national authorities. The FiTI Standard was developed over two years in a global multi-stakeholder endeavor. Its objective is to contribute to the sustainability of marine fisheries by increasing the accessibility, credibility and usability of national fisheries management information.

The **FiTI International Board**¹, the FiTI's global supervisory body, holds the overall responsibility for the validation process.

This Compliance Statement documents the FiTI International Board's final assessment for the first regular validation process of the Republic of Seychelles. The timeframe under validation was from April 2020 until December 2021.

The assessment of Seychelles' compliance with the FiTI Standard is comprised of **three phases** each building on the conclusions and recommendations of the previous phase.² Consequently, this Compliance Statement – the final phase of the validation process – should be read taking into consideration the outputs of the other two phases, as well as the overall parameters set up by the FiTI Standard and Guidance Note No. 3. The core deliverables of the first and second phases of the process can be found in Annex I and Annex II of this document.

Annex	Validation Phase	Deliverable	Responsibility	Date of publication
I	1	Baseline Assessment Report	FiTI International Secretariat	31 March 2022
II	2	Validation Report	Independent Validator (Mr Jose Peiro Crespo)	24 November 2022

The FiTI validation process offers a unique opportunity to conduct an objective and standardised verification of a country's past performances (e.g. published FiTI Reports) as well as to identify lessons learned, enhancement opportunities, and corrective actions to strengthen further the operational effectiveness of the FiTI implementation and the overall impact of the FiTI on the sustainable management of a country's marine fisheries. As such, the validation process is

¹ <https://www.fiti.global/fiti-international-board>

² For more information, please refer to the section 'Background of validation process' of this document.

beneficial for national stakeholders in validated countries as well as for FiTI's international stakeholders (e.g. business partners, donors, etc.).

However, the validation process should not be mistaken as a purely technical, audit-like exercise. Instead, when determining a country's level of compliance, the validation process must balance the outcomes of a detailed, evidence-based assessment of a country's performance against the individual requirements of the FiTI Standard (as outlined in its sections B.1 to B.3) with the overall perception of the country's performance against the spirit of the initiative – as documented in the FiTI Principles. In this regard, greater flexibility during a country's first regular validation processes should be applied when suitable. Also, it is indispensable to consider the context in which fishing activities and the implementation of the FiTI happen in the country.

With this final Compliance Statement, the validation process for the Republic of Seychelles is concluded. The decision on the overall compliance designation of Seychelles is final and cannot be appealed. The Compliance Statement, including its annexes, will be publicly available.

For assessing the overall compliance, the FiTI International Board took into account provision E.2.2 of the FiTI Standard about the possible breach of principles and spirit of the initiative, as well as provision D.1.2. that states that the FiTI International Board evaluates the overall compliance with the FiTI Standard based on the assessment of the individual FiTI requirements and considering the following factors:

- i. The advice and recommendations of the Independent Validator.
- ii. The nature of the outstanding requirements and how close the requirements are to being met.
- iii. The magnitude and complexity of the fisheries sector of the country.
- iv. Other barriers to meeting requirements, such as but not limited to state fragility and recent or ongoing political change, and the extent to which the National Multi-Stakeholder Group (MSG) has undertaken actions to resolve barriers encountered.
- v. The good faith efforts undertaken by the National MSG to comply with the requirements.
- vi. The reasons and justifications for not complying with the requirements.
- vii. Any plans agreed by the National MSG to address the requirements in the future.

In assessing an implementing country's overall compliance, the FiTI International Board has to apply the same designations used to assess the individual requirements outlined in provision D.1.1 of the FiTI Standard.

1) The FiTI International Board's decision

Validation is the Fisheries Transparency Initiative's (FiTI) quality assurance mechanism to assess implementing countries on their ability to meet the provisions of the FiTI Standard.

This is the Republic of Seychelles' (short 'Seychelles') **first regular validation**. Under the FiTI Standard (section D.1), the FiTI International Board launched the country's validation process in September 2021 and it ended in February 2023. The Board set the period under validation from April 2020 until December 2021. Consequently, Seychelles' first FiTI Report (covering the calendar year 2019) and second FiTI Report (covering the calendar year 2020) fall within the timeframe under validation.

On 5 December 2022, the FiTI International Board determined that Seychelles had made 'meaningful progress' in implementing the FiTI Standard during the validation timeframe.³

The FiTI International Board congratulates Seychelles on this achievement, demonstrating that significant aspects of the validation requirements have been implemented.⁴ The validation of Seychelles underlines the undeniable progress the country has made in improving transparency around its fisheries sector management. Within this first validation period, increasing amounts of information have been made public on government websites, for example, a summary of fisheries tenure arrangements for each of the country's fisheries in a user-friendly FAQ format, an online registry of industrial vessels licensed to fish in national waters, and a summary of the status of fish stocks.

At the same time, the impact of the FiTI in a country relies not only on increasing public access to fisheries information but also ensuring that this information is used to enhance the public debate and participatory governance. Hence, successful implementation of the FiTI Standard in a country requires an enabling environment for stakeholder participation. Such an enabling environment is enhanced by the existence of an active and engaged National Multi-Stakeholder Group (MSG) – comprising of representatives of government, business, and civil society sector – as well as the effective operational support provided by the country's FiTI National Secretariat for the implementation process. The responsibilities of the Secretariat include, for example, assisting in communication and dissemination activities. This validation process has identified improvement opportunities within the

³ Decision ID: BM-19_2022_D-01

⁴ The validation of Seychelles covered a total of 21 *individual validation requirements*, as set forth in sections B.1., B.2. and B.3 of the FiTI Standard:

- Transparency (comprised of 12 individual requirements),
- Procedures related to the FiTI Report (comprised of 4 individual requirements),
- National Implementation Framework (comprised of 5 individual requirements).

ongoing FiTI implementation process in Seychelles, particularly regarding this aspect of multi-stakeholder participation.

The FiTI International Board has therefore, in this Compliance Statement, set out **four corrective actions** that must be addressed by Seychelles' National MSG for the country to progress from 'meaningful process' to the final status of 'compliant.' Progress in addressing these corrective actions (see chapter 4) will be assessed as part of the country's second regular validation, scheduled to start on 30 June 2024.

Meanwhile, Seychelles will remain a **FiTI Candidate country**. In accordance with the FiTI Standard, Seychelles' National MSG may request an extension of this timeframe or that the next validation commences earlier than scheduled.

In accordance with section E.2.3 of the FiTI Standard, failure to achieve satisfactory progress in the second regular validation will result in a temporary suspension or delisting.

2) Background of the validation process

Current FiTI country status:	FiTI Candidate country (as of 3 April 2020) ⁵
Request of validation process:	FiTI International Board, Decision: BM-14_2021_D-04 ⁶
Type of validation:	Regular validation ⁷
Timeframe of validation:	April 2020 until December 2021
FiTI Reports due within validation timeframe:	<ul style="list-style-type: none">➔ 2019 FiTI Report, published on 16 April 2021➔ 2020 FiTI Report, published on 15 December 2021
Baseline Assessment Report:	<ul style="list-style-type: none">➔ Baseline Assessment Report finalised by FiTI International Secretariat on 31 March 2022 (and submitted to Independent Validator, once he was appointed)➔ Refer to Annex I
Validation Report:	<ul style="list-style-type: none">➔ Validation Report submitted by Independent Validator (Mr Jose Peiro Crespo) to FiTI International Board on 24 November 2022➔ Refer to Annex II
Compliance Statement:	<ul style="list-style-type: none">➔ Overall compliance designation approved by FiTI International Board on 5 December 2022➔ Compliance Statement finalised by FiTI International Board (through designated Validation Committee) on 15 February 2023

⁵ <https://www.fiti.global/seychelles-is-granted-fiti-candidate-country-status>

⁶ 14th meeting of the FiTI International Board, 9 September 2021

⁷ The FiTI International Board approved in its 16th meeting (17 February 2022) that the country validation for Seychelles must be completed prior to the publication of the country's third FiTI Report (instead of the second FiTI Report, as outlined in section D.4 of the FiTI Standard); Decision ID: BM-16_2022_D-02.

The assessment of Seychelles' compliance with the FiTI Standard was implemented in three stages or phases – each building on the conclusions and recommendations of the previous one – as shown below:

FiTI Standard	Section D.2.1	Section D.2.2	Section D.2.3
Responsibility	FiTI International Secretariat	Independent Validator	FiTI International Board
Status for Seychelles	 (31 March 2022)	 (24 November 2022)	 (5 December 2022)

In the **first phase**, the FiTI International Secretariat prepared a Baseline Assessment Report (Annex I), which provided the Secretariat's initial evaluation of progress against the requirements of the FiTI Standard.⁸ Primarily through desk-based research, the International Secretariat:

- Determined the level of compliance for each of the *21 individual validation requirements*:
 - Transparency (comprised of 12 individual requirements),
 - Procedural related to the FiTI Report (comprised of 4 individual requirements),
 - National Implementation Framework (consists of 5 individual requirements);
- Documented efforts that went beyond FiTI requirements;
- Provided recommendations to strengthen the FiTI implementation process further; and,
- Identified additional aspects for the consideration of the Independent Validator.

⁸ During its 15th meeting (November 2021), the FiTI International Board approved that the first step of the validation process for Seychelles be conducted by the FiTI International Secretariat. Such step entailed a detailed desk review of the countries' compliance with the individual requirements of the FiTI Standard. On the other hand, the responsibility of conducting stakeholder interviews to provide objective verification of the assessment of each individual requirement, as well as to determine lessons learned and a recommendation for the overall compliance designation, was the exclusive purview of the Independent Validator. The Independent Validator's draft report was provided to the countries' National MSG for feedback before the final version was submitted by the Independent Validator to the FiTI International Board [BM-15_2021_D-03].

The Baseline Assessment Report was shared with the FiTI International Board in March 2022 to receive comments and finalised on 31 March 2022. The report was then submitted to the Independent Validator once he was appointed.

In the **second phase**, Mr Jose Peiro Crespo was chosen by the FiTI International Board as the country's Independent Validator.⁹ Primarily through stakeholder consultations¹⁰ (and complementary research), the Independent Validator:

- Reviewed the Secretariat's baseline assessment of each individual requirement as well as the country's progress performance;
- Identified opportunities to improve further the operational effectiveness as well as the impact of the national FiTI implementation in terms of promoting sustainable fisheries management; and
- Provided a recommendation for the overall country compliance designation, following the categories stated in section D.1.1 of the FiTI Standard.

The Independent Validator documented his findings in the Validation Report, which also included feedback from the FiTI National Lead regarding the preliminary findings (obtained during a feedback process in the first weeks of November).

The Independent Validator submitted his final Validation Report for Seychelles to the FiTI Chair on 24 November 2022.

In the **third and final phase**, the FiTI International Board reviewed the assessments and recommendations documented in the Independent Validation Report. The FiTI Board decided on the final overall country determination during its 18th meeting held on 5 December 2022, taking into consideration the following aspects:¹¹

Level of compliance for the 21 individual requirements of the FiTI Standard

After reviewing the Independent Validation Report and, where necessary, making a comparison with the analysis in the Secretariat's Baseline Assessment Report, the designated Board Committee, noted its agreement with the Independent Validator's assessment regarding 15 of the 21 individual requirements.

The Board Committee disagreed with the scores of six individual requirements. As a result, it made the following decisions:

⁹ As per FiTI Board Circular No. 8 (Decision ID: BC-08_2022_D-01).

¹⁰ During a site visit to the Seychelles between May 30 and June 12, 2022.

¹¹ The FiTI International Board did not conduct additional research or stakeholder interviews and relied solely on the documents provided in phases 1 and 2 of this validation process.

- The final designation for *B.1.5 [Large-scale fisheries]* was ‘compliant’, as the lack of information on beneficial ownership for vessel owners is not currently a requirement under the FiTI Standard. Furthermore, the lack of catch and landing information for some fleets was acknowledged and clearly explained in both FiTI Reports (e.g. data is not available at all or delayed from industrial longliners). Therefore, both FiTI Reports followed the core principle of ‘progressive improvement’, under which the government must publish the information it has, and if gaps exist, the government must demonstrate improvement over time. Therefore, the partial lack of catch and landing data within the FiTI reporting timeframe must be reviewed during the second validation process.
- The final designation for *B.1.11 [Official Development Assistance]* was ‘meaningful progress’, as only partial information was provided in the FiTI Reports (i.e., fisheries-related development projects). However, the FiTI International Board perceived that the National MSG gave a credible operational reason in the FiTI Reports to justify the lack of a comprehensive publication of public sector conservation projects during the FiTI reporting process, under validation.¹² In fact, both reports provided descriptive information about several such projects. Also, a partial list of public agencies implementing conservation-related public sector projects in Seychelles was published.
- The final designation for *B.1.12 [Beneficial Ownership]* was ‘compliant’, as even if the Independent Validator’s scoring of the five validation indicators for this transparency requirement would be accepted, it would still lead to an overall score of ‘compliant’ following the scoring guidelines for individual requirements determined in FiTI’s Guidance Note #3.
- The final designation for *B.2.4 [Report Dissemination and Public Debates]* was ‘meaningful progress’. The FiTI International Board considered that while further improvements are needed to ensure that the FiTI Reports lead to better decision-making, oversight, and public debate in Seychelles (in particular with stakeholders not directly involved in fisheries), the National MSG made efforts to widely distribute the FiTI Reports, including an official launching ceremony with the participation of the President of Seychelles and other key stakeholders, despite the limitations inflicted by the COVID pandemic. Overall, the impact of the COVID-19 pandemic was considered for this score.
- The final designation for *B.2.1 [Enabling Environment for Stakeholder Participation]* was ‘compliant’ as there was no evidence that the Government of Seychelles had done anything to impede an enabling environment for stakeholder participation.

¹² As part of both FiTI Reporting processes, the National MSG compiled a list of fisheries-related public sector development projects.

While the FiTI International Board acknowledged that stakeholder participation (within and outside of the country's FiTI National MSG) needed significant improvement, it also stated that, as described in the report, the government had not impeded or restricted such participation in any way. It was generally acknowledged that the civil society sector in Seychelles is not strong, reflecting the country's population size and that it had access to limited resources. As a consequence, only a few non-governmental organizations or groups have the institutional capacity to perform adequate oversight functions, raise issues of national interest in the public sphere, or hold decision-makers accountable. This is especially true in the fisheries sector, which requires a high degree of knowledge and expertise. However, future validations should examine this aspect further, including the role of the members of the National MSG in setting positive examples.

- The final designation for *B.3.2. [Governance and Support]* was 'meaningful progress', as the government – despite maintaining a FiTI Lead Ministry and a FiTI National Lead – has not addressed one of the core needs of the FiTI process in Seychelles: having adequate and proactive operational support through a dedicated FiTI National Secretariat. While this has not delayed any significant activities within the country, and critical outputs have been produced (such as the FiTI Reports), it has also not strengthened the process and potentially weakened the level of engagement of National MSG members.

Occurrence of any breach of the principles or the spirit of the FiTI

The FiTI International Board agreed with the Independent Validator's assessment that there had not been any breaches of the FiTI principles or spirit during the validation timeframe – as per section E.2.2 of the FiTI Standard.

Seychelles' overall compliance designation in accordance with section D.1.2 of the FiTI Standard

As the FiTI International Board reviewed and changed the scores of six individual validation requirements, as explained above, it also adjusted the overall country designation accordingly.

Therefore, based on the scores of all the individual validation requirements and applying provision D.1.2. of the FiTI Standard, the FiTI International Board found that Seychelles had made 'meaningful progress' in implementing the FiTI Standard during the validation timeframe. This decision took into consideration that significant aspects of the FiTI Standard had been implemented by the government or with its support, demonstrating its commitment to the FiTI. An overall score of 'meaningful progress' recognized the considerable progress made by the country in fisheries transparency while acknowledging

that further improvements in stakeholder participation were needed and that work must be done in that area.

3) Final Validation Scorecard

The Validation Scorecard documents the final compliance designation for each of the 21 requirements of the FiTI Standard (sections B.1 to B.3).

Seychelles: Final Validation Scorecard (April 2020 – December 2021)						
Requirements of the FiTI Standard (section B)	Level of compliance					Direction of progress
	Compliant	Meaningful progress	Inadequate progress	No progress	Exceeding (if applicable)	Compared to previous validation(s): No change – worse – better (choose one)
B.1 Transparency requirements						
B.1.1 Public Registry of National Fisheries Laws, Regulations, and Official Policy Documents						Not applicable
B.1.2 Fisheries Tenure Arrangements						Not applicable
B.1.3 Foreign Fishing Access Agreements						Not applicable
B.1.4 The State of the Fisheries Resources						Not applicable
B.1.5 Large-Scale Fisheries						Not applicable
B.1.6 Small-Scale Fisheries						Not applicable
B.1.7 Post-Harvest Sector and Fish Trade						Not applicable
B.1.8 Fisheries Law Enforcement						Not applicable
B.1.9 Labour Standards						Not applicable
B.1.10 Fisheries Subsidies						Not applicable
B.1.11 Official Development Assistance						Not applicable
B.1.12 Beneficial Ownership						Not applicable
B.2 Procedural requirements for FiTI Reports						
B.2.1 Reporting Requirements						Not applicable
B.2.2 Reporting Deadlines and Periods						Not applicable

Seychelles: Final Validation Scorecard (April 2020 – December 2021)						
Requirements of the FiTI Standard (section B)	Level of compliance					Direction of progress
	Compliant	Meaningful progress	Inadequate progress	No progress	Exceeding (if applicable)	
						<i>Compared to previous validation(s): No change – worse – better (choose one)</i>
B.2.3 Reporting Process						<i>Not applicable</i>
B.2.4 Report Dissemination and Public Debate						<i>Not applicable</i>
B.3 National Implementation Framework						
B.3.1 Enabling Environment for Stakeholder participation						<i>Not applicable</i>
B.3.2 Governance and Support						<i>Not applicable</i>
B.3.3 Multi-Stakeholder Oversight						<i>Not applicable</i>
B.3.4 Annual Workplan						<i>Not applicable</i>
B.3.5 Impact Report						<i>Not applicable</i>
Overall compliance designation						<i>Not applicable</i>
Efforts that go beyond the scope of the FiTI Standard (optional)						
<i>None</i>						

4) Corrective actions

The FiTI Board Committee discussed the following corrective actions to be undertaken by Seychelles to move toward compliance with the FiTI Standard. Progress in addressing these corrective actions would be assessed during the country's second validation, scheduled to commence on **June 30, 2024**:

- 1) *Under section B.3.3 of the FiTI Standard, the FiTI Lead Ministry must maintain a National MSG to oversee the implementation of the FiTI with representatives from government, business and organised civil society, which is appropriately qualified and fully, actively, and effectively engaged in the FiTI. In doing so, the FiTI Lead Ministry must, inter alia:*

- Reviewing, and (if necessary) adjusting the current composition of the National MSG (e.g. based on attendance records, the date of expiry of existing members' terms), and perform an analysis of the organisations or entities that are relevant for sustainable marine fisheries in Seychelles but that are currently absent from the National MSG, such as the Ministry of Finance;
- Ensuring that the procedures for nominating and replacing members of the National MSG are public and implemented in a way that is widely perceived as fair, open, and transparent. This process should incorporate the right of each stakeholder group to appoint its representatives;
- Discussing the possibility of rotating the position of Chair of the National MSG between all three stakeholder groups that form part of the National MSG;

The National MSG should also ensure that relevant meetings are open to observers, in accordance with the National MSG's ToR.

To strengthen the implementation of the FiTI, the government may wish to consider additional means of institutionalising the FiTI process in systematic government disclosures, national laws, and regulations, as well as in the government's budget-making process regarding the annual FiTI reporting process.

- 2) *As per section B.3.2 of the FiTI Standard, the FiTI Lead Ministry must ensure that administrative and operational support is provided to the National MSG – in the form of a dedicated FiTI National Secretariat.* This includes, inter alia:
 - Defining the Department of Blue Economy's and the Seychelles Fishing Authority's respective organisational and personnel responsibilities for running the FiTI National Secretariat;
 - Defining the responsibilities of the FiTI National Secretariat, which must not only take into account the requirements of the FiTI implementation process (as outlined in sections A-C of the FiTI Standard) but also incorporate the views and expectations of the National MSG regarding such operational support;
 - Ensuring that sufficient time is afforded to the staff member(s) selected to act as the FiTI National Secretariat (if they have other responsibilities).
- 3) *In accordance with section B.2.4 of the FiTI Standard, Seychelles' FiTI National MSG must determine a formalised approach to ensure that the information published through the FiTI implementation process contributes to sustainable policy-making, effective oversight, accountability, and public debates.* The National MSG must strengthen its efforts to conduct communication and capacity-building activities among national, regional, and international stakeholders. These efforts should also

include seeking stronger linkages with other relevant institutions and endeavors, such as the Information Commission or the Open Government Partnership.

- 4) *In accordance with section B.1.10 of the FiTI Standard, Seychelles' FiTI National MSG must clarify whether government financial transfers or subsidies are given to the country's large-scale commercial fisheries sector, and if so, all the relevant information should be published in accordance with this section.* The validation process has shown that Seychelles' FiTI Reports include information on subsidies to the country's small-scale fisheries, including information on the fuel incentive scheme and ice subsidies. However, no such information is provided for large-scale fisheries, which results in an imbalance in the levels of publicly available information about the two sectors, which also impedes any comparative analysis of the subsidies they each receive.

The National MSG must document its comments and plans to implement these corrective actions in its next Workplan.



Fisheries
Transparency
Initiative

Validation of the Republic of Seychelles

Annex I

**Baseline Assessment Report of the
FiTI International Secretariat
(April 2020 – December 2021)**



Regular country validation: Baseline Assessment Report for the Republic of Seychelles (April 2020 – December 2021)

Prepared by: FiTI International Secretariat

Date: 31 March 2022

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Abbreviations

DoBE	Department of the Blue Economy
EEZ	Exclusive Economic Zone
EU	European Union
FAO	Food and Agriculture Organisation of the United Nations
FiTI	Fisheries Transparency Initiative
FIU	Financial Intelligence Unit
IOTC	Indian Ocean Tuna Commission
MCS	Monitoring, Control and Surveillance
MESA	Ministry of Employment and Social Affairs
MoFBE	Ministry of Fisheries and the Blue Economy
MSG	Multi-Stakeholder Group
NBS	National Bureau of Statistics
ODA	Official Development Assistance
SCR	Seychellois Rupee
SEYLII	Seychelles Legal Information Institute
SFA	Seychelles Fishing Authority


Executive Summary

Validation is an essential part of the FiTI process. It serves to assess an implementing country's compliance with the FiTI Standard (namely its *transparency requirements* and *procedural requirements*, as well as the country's *enabling environment* for multi-stakeholder participation and oversight). Validation also helps promote dialogue and learning at the country level, and safeguards the integrity of the FiTI by holding all FiTI implementing countries to the same global standard.

The provisions that must be applied when conducting validations are set forth in section D of the FiTI Standard.¹

The FiTI International Board, the initiative's global supervisory body, holds the overall responsibility for the validation process. It initiates the process and determines the implementing country's overall level of compliance in accordance with provision D.1.2 of the FiTI Standard.

The assessment of a country's compliance with the FiTI Standard is spread across three phases of validation - each building on the conclusions and recommendations of the previous phase – as shown below:

FiTI Standard	Section D.2.1	Section D.2.2	Section D.2.3
			
Responsibility	FiTI International Secretariat	Independent Validator	FiTI International Board

For the *Republic of Seychelles* (short Seychelles), the FiTI International Board launched the country's first validation process in accordance with the FiTI Standard (section D.1) in September 2021, setting the validation timeframe from April 2020 until December 2021. Consequently, Seychelles first FiTI Report (calendar year 2019) as well as its second FiTI Report (calendar year 2020) both fall within the timeframe of this validation.

As part of the first validation process step, the FiTI International Secretariat has documented its initial assessment of Seychelles' compliance against the criteria of the FiTI Standard in this report.

¹ <https://www.fiti.global/fiti-standard>

This assessment was primarily carried out via desk research, without the involvement of national or international stakeholders.²

In accordance with section D.2.1 of the FiTI Standard, this report does not include an overall assessment of compliance.

Key findings

Assessment of transparency requirements, in accordance with section B.1 of the FiTI Standard

This assessment shows significant improvements in the online transparency of fisheries management information in Seychelles, in particular when comparing the situation prior to and after the validation timeframe. Whereas the first FiTI reporting process, in general, saw information held by national authorities being publishing as part of the FiTI Report, the second FiTI reporting process showed the government making significant amount of this information publicly available on government websites. Notable examples of information now freely accessible on government websites include:

- ➡ An online summary description of *tenure arrangements* of Seychelles' four fisheries (i.e. recreational fisheries, sport fisheries, scientific fisheries, and commercial fisheries (artisanal, semi-industrial, large-scale));
- ➡ An online *large-scale vessel registry* of all Seychelles-flagged and foreign-flagged vessels authorised to fish in Seychelles' marine jurisdictional waters, as well as Seychelles-flagged vessels authorised to fish in third countries' marine jurisdictional waters and on the High Seas – this vessel registry also includes license payment data;
- ➡ The contracts of *foreign fishing access agreements* with the European Union (including Mayotte) and Mauritius;
- ➡ The names of *license holders for Seychelles' small-scale fisheries*, including the sea cucumber fishery;

² During its 15th meeting, the FiTI International Board approved a deviation from the validation procedures stated in section D.2.1. The FiTI International Board approved that the first process step of the validation process for Seychelles and Mauritania, tasked to be conducted by the FiTI International Secretariat, would involve only a detailed desk review of the countries' compliance with the individual requirements of the FiTI Standard. Consequently, the responsibility of conducting stakeholder interviews to provide an objective verification of the assessment of each individual requirement (as conducted by the FiTI International Secretariat), as well as to determine lessons learned and a recommendation for the overall compliance designation, would be given to the Independent Validator. The FiTI International Board also approved for only the Independent Validator's draft report to be provided to the countries' National MSG for feedback before the final version is submitted by the Independent Validator to the FiTI International Board (Decision-ID: BM-15_2021_D_03).

These advancements in online transparency mostly stem from the efforts of Seychelles' government to implement recommendations made by the country's National Multi-Stakeholder Group (MSG). In its 2019 FiTI Report, the National MSG determined *34 recommendations*, of which 21 recommendations were due by the end of 2021. The current implementation status (as of February 2022) of these recommendations is as follows:

- ➡ 11 of these recommendations (i.e. 52%) were fully implemented between the launch of the country's 2019 and 2020 FiTI Reports (April-December 2021);
- ➡ 5 recommendations are in the process of being implemented (24%);³ and
- ➡ 5 recommendations remain open.⁴

Furthermore, additional information has been made publicly available in the FiTI Reports (as an interim measure), including the following:

- ➡ A list of *foreign vessels apprehended for illegal fishing* in Seychelles' waters, as well as a list of recorded *fisheries offences*;
- ➡ Information on the total amount of *subsidies* given to Seychelles' small-scale fisheries sector, including the annual value of fuel subsidies;
- ➡ An overview of *fisheries-related public sector development projects*.

These achievements are particularly noteworthy given that two major events affecting Seychelles fell within the timeframe of this validation. These are the COVID-19 pandemic, which brought major implications for an initiative based on stakeholder collaboration, and a presidential election, which resulted in the first peaceful transfer of presidential power between political parties since the country's independence in 1976.

Furthermore, both FiTI Reports made transparent several obstacles hindering national authorities from collating and/or publishing information, such as:

- ➡ A lack of information from the *industrial longline fishery*, mainly due to administrative challenges within Seychelles' national authorities as well as unreturned logbooks from longline

³ A sixth recommendation, due by December 2022, is also already in the process of being implemented.

⁴ As the second FiTI Report of Seychelles was launched on 15 December 2021, no recommendations issued as part of the report are relevant for this validation timeframe and are therefore not taken into account.

vessels under the Chinese and Taiwanese (POC) flags, impacting the quality of data around catches, landings and transshipments, as well as discards;

- ➡ Confidentiality clauses preventing the publication of certain *private foreign fishing access agreements*;
- ➡ Information on *subsidies* provided to Seychelles' large-scale fisheries sector (besides a VAT concession on fuel).

Highlighting such issues helps to increase public understanding around the operational and legal challenges national authorities face when striving to increase access to sectoral (in this case fisheries) information.

It is emphasised that the government of Seychelles has shown *no signs of wilfully withholding information the FiTI Standard requests to be published*. Additionally, the National MSG has issued frank explanations in cases where information has not been published, e.g. by acknowledging administrative constraints, such as corrupted data due to ransomware attacks, loss of physical files due to fungus etc.

The assessment scores for each of the twelve transparency requirements – as set forth in section B.1 of the FiTI Standard – are shown below in the Validation Scorecard.

Assessment of procedural requirements, in accordance with section B.2 of the FiTI Standard

Broadly speaking, the procedural requirements outlined in section B.2.1 of the FiTI Standard have been closely adhered to by Seychelles during the production of its first two FiTI Reports (2019 and 2020). The 2019 report was published as one comprehensive document, while the National MSG decided to split the 2020 report into a summary section – highlighting main findings – and a detailed section evaluating in greater depth the public availability of information demanded by each of the FiTI Standard's 12 transparency requirements. Information mentioned in the reports (e.g. policy documents, vessel registry etc.) typically include references to where it can be found in the public domain, and the National MSG made wide ranging recommendations on how the government of Seychelles can continue strengthening the public availability of accessible, complete and up-to-date fisheries management information (34 such recommendations were made in the 2019 FiTI Report and 22 in the 2020 FiTI Report). The 2020 report also explains significant deviations from findings included in the 2019 report.

Seychelles' National MSG also opted to cover *all 12 transparency requirements in both reports*, whereas the FiTI Standard only requests an implementing country's second FiTI Report to cover these 12 requirements.

It is noted that while Seychelles' 2019 FiTI Report did comply with the [reporting deadline](#)⁵, it did not formally comply with the [reporting period](#) set forth in the FiTI Standard. According to section B.2.2, a country's first FiTI Report must contain information from the complete calendar year of when it became a FiTI Candidate Country (i.e. 2020 in Seychelles' case). But Seychelles' first FiTI Report covered information from calendar year 2019. This was explained by the fact that certain information relevant for the FiTI Report (e.g. catch data from distant (tuna) fishing fleets) is often received by Seychelles' national authorities with a delay of up to 12 months, and thus, the information relevant for calendar year 2020 would have only been available to the government (latest) towards the end of 2021. If the National MSG had chosen to comply with this requirement and publish its first report with information from calendar year 2020, the report would only have been published at the end of 2021 and thus, at least 18 months after the Seychelles obtained FiTI Candidate Country status. This would likely have resulted in a loss of momentum for the FiTI within the country. As a FiTI validation takes into account whether a country acts in accordance with the spirit of the FiTI – as well as evaluating how compliant it is against the requirements of the initiative – the fact that the National MSG published Seychelles' first (2019) FiTI Report as early as possible, instead of waiting to fulfil a formal requirement, is seen as positive and not as a violation of the FiTI Standard. Furthermore, Seychelles went on to publish its second (2020) FiTI Report in the same year (i.e. 15 December 2021 – again meeting the reporting deadlines of the FiTI Standard – underscoring the National MSG's commitment to enhancing public availability of fisheries information.

Similarly, Seychelles' 2019 and 2020 FiTI Reports followed the correct [reporting process](#) outlined by the FiTI Standard. Both reports were prepared by the same Report Compiler, Mr. Jude Bijoux, whose appointment was endorsed by the Seychelles FiTI National MSG. During the two reporting processes, Mr. Bijoux held many discussions with relevant stakeholders and was given extensive access to fisheries information and data held by the government (e.g. SFA). Mr. Bijoux worked closely with the National MSG to produce the reports, submitting first drafts for the group's review and comments. The National MSG also formally approved both reports prior to their publication.

However, it needs to be emphasised that Seychelles is struggling with the limited distribution of the country's FiTI Reports to key national stakeholders, and a subsequent [lack of public debate](#) around the management of the fisheries sector. Factors contributing to this situation, in part, include a weak media/civil society landscape and a historic underappreciation of the importance of the fisheries sector in Seychelles. A so-called 'Tour des Seychelles' was planned by the National MSG to sensitise different stakeholders on the 2019 FiTI Report; however, this activity did not take place partly due to national COVID-19 restrictions, as well as a lack of engagement among MSG members. While there

⁵ In accordance with section B.2.2 of the FiTI Standard, the 'National MSG must publish their first FiTI Report within the subsequent year of becoming a FiTI Candidate country'. Seychelles became a Candidate country on 3 April 2020 and published its first report on 16 April 2021.

is anecdotal evidence of stakeholder reactions from the information contained in both FiTI Reports, such reactions have been limited to small circles of individuals already engaged in the industry. There remains significant work to be done, in particular by the Seychelles' National MSG, to ensure FiTI Reports spark discussions among the wider public and are used in public decision-making.

The assessment scores for each of the four procedural requirements – as set forth in section B.2 of the FiTI Standard – are shown below in the Validation Scorecard.

Assessment of the Seychelles' national enabling environment, in accordance with section B.3 of the FiTI Standard

The government of Seychelles provides an *enabling environment* for business and civil society participation (with regard to relevant laws, regulations, administrative rules as well as actual practice). This stems from a brief analysis of national (and international) laws and regulations.

Throughout the entire timeframe of this validation, the *FiTI Lead Ministry* (i.e. Department of Blue Economy (DoBE)) as well as the *FiTI National Lead* (i.e. Philippe Michaud) remained the same. This stability is seen as an important factor in the country's successful implementation over the last two years.

Whereas Seychelles' FiTI *National MSG* is generally seen to be sufficiently diverse to represent a range of different stakeholder views, evidence suggests that some members are not active and fully engaged in the National MSG. This, as well as the *operational support through a dedicated FiTI National Secretariat*, are issues that need to be addressed. While this is not seen as a major concern for this validation timeframe (also acknowledging the impact of COVID-19 on in-person meetings), these aspects require additional improvements in order to bolster the impact of the FiTI in Seychelles.

As Seychelles' first *Impact Report* is due in 2023 (i.e. 3 years after Seychelles became an FiTI Candidate country), this element has not been taken into account for this validation.

The assessment scores for each of the five requirements of a national enabling environment – as set forth in section B.3 of the FiTI Standard – are shown below in the Validation Scorecard.

Validation Scorecard

The Validation Scorecard documents the final compliance designation for each of the 21 requirements of the FiTI Standard (sections B.1 to B.3). The numerical scores for each requirement are not stated here.

Seychelles: Validation Scorecard (April 2020 – December 2021)						
Requirements of the FiTI Standard (section B)	Level of compliance					Direction of progress
	Compliant	Meaningful progress	Inadequate progress	No progress	Exceeding (if applicable)	
						<i>Compared to previous validation(s): No change – worse – better (choose one)</i>
B.1 Transparency requirements						
B.1.1 Public Registry of National Fisheries Laws, Regulations and Official Policy Documents						<i>Not applicable</i>
B.1.2 Fisheries Tenure Arrangements						<i>Not applicable</i>
B.1.3 Foreign Fishing Access Agreements						<i>Not applicable</i>
B.1.4 The State of the Fisheries Resources						<i>Not applicable</i>
B.1.5 Large-Scale Fisheries						<i>Not applicable</i>
B.1.6 Small-Scale Fisheries						<i>Not applicable</i>
B.1.7 Post-Harvest Sector and Fish Trade						<i>Not applicable</i>
B.1.8 Fisheries Law Enforcement						<i>Not applicable</i>
B.1.9 Labour Standards						<i>Not applicable</i>
B.1.10 Fisheries Subsidies						<i>Not applicable</i>
B.1.11 Official Development Assistance						<i>Not applicable</i>
B.1.12 Beneficial Ownership						<i>Not applicable</i>
B.2 Procedural requirements for FiTI Reports						
B.2.1 Reporting Requirements						<i>Not applicable</i>
B.2.2 Reporting Deadlines and Periods						<i>Not applicable</i>

Seychelles: Validation Scorecard (April 2020 – December 2021)						
Requirements of the FiTI Standard (section B)	Level of compliance					Direction of progress
	Compliant	Meaningful progress	Inadequate progress	No progress	Exceeding (if applicable)	Compared to previous validation(s): No change – worse – better (choose one)
B.2.3 Reporting Process						Not applicable
B.2.4 Report Dissemination and Public Debate						Not applicable
B.3 National Implementation Framework						
B.3.1 Enabling Environment for Stakeholder participation						Not applicable
B.3.2 Governance and Support						Not applicable
B.3.3 Multi-Stakeholder Oversight						Not applicable
B.3.4 Annual Workplan						Not applicable
B.3.5 Impact Report						Not applicable
Overall compliance designation (for Independent Validators and FiTI International Board only)						Not applicable
Efforts that go beyond the scope of the FiTI Standard (optional)						
None						

Recommendations

As part of this initial baseline assessment of Seychelles' compliance with the FiTI Standard, the FiTI International Secretariat determined the following recommendations (relevant to the Seychelles' government and the National MSG) for the consideration of the Independent Validator:

Transparency requirements

- ➡ Publish online the following information, which is available to the government, but neither published on a governmental website nor as part of the FiTI Reports⁶:
 - Information from previous (prior to 2019) and recent national stakeholder consultations undertaken with respect to the preparation, negotiation or monitoring of foreign fishing access agreements;
 - Private fishing access agreements signed between Seychelles and the Taiwan Deep-sea Tuna Longline Boat Owners and Exporters Association (TTA), between Seychelles and Top Fortune International (TFI), and between Seychelles and Dongwon Industries Co. Ltd.;
 - Information about legal ownership of large-scale fishing vessels;
 - Names of large-scale vessels (i.e. industrial longline fishery) that do not provide catch data (at all and/or on-time);
 - Detailed information on fish and fish product imports;
 - Statement of whether an informal fisheries sector exists in Seychelles;
- ➡ Publish the following information, which is currently only available as part of FiTI Reports on government websites:
 - Record of convictions of major offences in the fishing sector, covering detailed requirements as stated in section B.1.8 of the FiTI Standard;
 - Total number of offences committed by employers in the fisheries sector that have been resolved by the authorities;
 - List of fisheries-related public sector development projects.
- ➡ Strengthen the information that is already published online on a governmental website:

⁶ This refers only to aspects that have not been addressed by the National MSG as part of their recommendations to the Seychelles' national authorities.

- *[B.1.1 - Public Registry of National Fisheries Laws, Regulations and Official Policy Documents]* Provide brief summary information and dates of publication for laws, regulations and policy documents relevant for marine fisheries;
- *[B.1.4 – The State of the Fisheries Resources]* Provide a link to the IOTC stock assessment dashboard on the website of MoFBE or SFA.

Procedural requirements

- ➡ Determine a formalised approach to how the main findings of the FiTI Report can contribute to public debates on how the fisheries sector is managed, or how this information can feed into public policy making (also see next section).
- ➡ Ensure increased circulation of the information published online and/or in FiTI Reports to raise awareness among:
 - national authorities, such as the Ministry of Finance, Trade Investment and Economic Planning, the Ministry of Foreign Affairs and Tourism, the Information Commission, the Anti-Corruption Commission;
 - non-governmental organisations, such as Transparency Initiative Seychelles or Nature Seychelles, as well as
 - intergovernmental organisations, such as the FAO or the Indian Ocean Tuna Commission, to facilitate cross-checking of data submitted to both the FiTI and other such organisations and strengthen overall data reliability.
- ➡ Document important decisions of the National MSG in its meeting minutes, such as the endorsement of Report Compilers or the approval of annual FiTI Reports. This also includes ensuring all meeting minutes of Seychelles' FiTI National Multi-Stakeholder Group are available online⁷.
- ➡ Ensure that FiTI Reports are published under an open and unrestricted license, such as those developed by Creative Commons, and make users aware that information published in these reports can be reused without prior consent. This is particularly important as the FiTI Reports still serve as a primary source of information (i.e. they contain some information that is not yet published anywhere else online).

National Implementation Framework

⁷ At present (28 February 2022), the minutes of the first seven meetings of Seychelles' FiTI National MSG are not published online (<http://www.mofbe.gov.sc/fiti/national-multi-stakeholder-group>).

- ➡ Clarify the organisational and personnel responsibility of the FiTI National Secretariat between the DoBE and the SFA.
- ➡ Explore operational synergies with the already established Secretariat for the Extractive Industries Transparency Initiative (EITI) and the FiTI National Secretariat (e.g. regarding beneficial ownership transparency).
- ➡ Consider including a representative from another ministry (e.g. Ministry of Finance) in the government group of the National MSG⁸.
- ➡ Deactivate the website of the previous Ministry of Fisheries and Agriculture (<http://mofa.gov.sc>).

Additional aspects for the consideration of the Independent Validator

As part of this initial assessment of Seychelles' compliance with the FiTI Standard, the FiTI International Secretariat determined that the following additional aspects should be considered during the stakeholder consultation phase, to be conducted by the Independent Validator:

- ➡ Discuss with stakeholders and key informants about how to ensure that the main findings of the FiTI Reports contribute systematically to public debates on how the fisheries sector is managed as well as public policy-making processes (e.g. when negotiating foreign fishing access agreements);
- ➡ Elaborate on how civil society involvement, in particular those that are not directly represented in the National MSG, can be further strengthened;⁹
- ➡ Discuss with members of the National MSG how meetings can become less technical and more relevant for fisheries management (e.g. 'Transparency in action').

⁸ In order to maintain the current size of the National MSG, it is suggested that the current FiTI National Lead will chair the National MSG as a non-voting member, and thus, does not count towards the overall membership size of the group. In case it is decided that the overall size of the MSG is extended to thirteen members, the voting powers of the government stakeholder group needs to be adjusted to reflect equal voting powers between each stakeholder group.

⁹ This may also include any possible technical, financial or capacity constraints currently affecting stakeholder involvement in the FiTI (in particular civil society and small-scale fisheries)

1) Key parameters and scope of validation

This validation process is based on the following key parameters:

Target country:	Republic of Seychelles (short Seychelles)
Current FiTI country status:	FiTI Candidate country (as of 3 April 2020) ¹⁰
Request of validation process:	FiTI International Board, Decision: BM-14_2021_D-04 ¹¹
Type of validation:	Regular validation ¹²
Timeframe of validation:	April 2020 until December 2021
FiTI Reports due within validation timeframe:	<ul style="list-style-type: none"> ➡ 2019 FiTI Report, submitted on 16 April 2021 ➡ 2020 FiTI Report, submitted on 15 December 2021
Responsibility for report:	<ul style="list-style-type: none"> ➡ <u>Author:</u> Mr. Will May (FiTI Regional Coordinator for Western Indian Ocean) ➡ <u>Reviewer:</u> Mr. Sven Biermann (FiTI Executive Director)
Cut-off date for information to be considered for this report:	28 February 2022

¹⁰ <https://www.fiti.global/seychelles-is-granted-fiti-candidate-country-status>

¹¹ 14th meeting of the FiTI International Board, 9 September 2021

¹² The FiTI International Board approved in its 16th meeting (17 February 2022) that the country validation for Seychelles must be completed prior to the publication of the country's third FiTI Report (instead of the second FiTI Report, as outlined in section D.4 of the FiTI Standard); Decision ID: BM-16_2022_D-02.

The scope of this baseline assessment covers Seychelles' level of compliance against a total of **21 validation elements**, as defined in sections B.1 to B.3 of the FiTI Standard:¹³

Transparency requirements	Procedural requirements for FiTI Reports	Requirements for National Implementation Framework
<i>Section B.1 of the FiTI Standard</i>	<i>Section B.2 of the FiTI Standard</i>	<i>Section B.3 of the FiTI Standard</i>
<ol style="list-style-type: none"> 1. Public Registry of National Fisheries Laws, Regulations and Official Policy Documents 2. Fisheries Tenure Arrangements 3. Foreign Fishing Access Agreements 4. The State of the Fisheries Resources 5. Large-Scale Fisheries 6. Small-Scale Fisheries 7. Post-Harvest Sector and Fish Trade 8. Fisheries Law Enforcement 9. Labour Standards 10. Fisheries Subsidies 11. Official Development Assistance 12. Beneficial Ownership 	<ol style="list-style-type: none"> 1. Reporting Requirements 2. Reporting Deadlines and Periods 3. Reporting Process 4. Report Dissemination and Public Debate 	<ol style="list-style-type: none"> 1. Enabling Environment for Stakeholder Participation 2. Governance and Support 3. Multi-Stakeholder Oversight 4. Annual Workplan 5. Impact Report

In accordance with the FiTI Standard (section D.1.1.) as well as Guidance Note #3 on 'Validating countries', the *level of compliance* for each requirement is indicated by applying one of the following designations:

¹³ The requirements for countries intending to implement the FiTI (sign-up steps), as set forth in section A of the FiTI Standard, have already been assessed by the FiTI International Board in April 2020 upon Seychelles' application to become a recognised FiTI Candidate Country and are therefore not reassessed during validation.

i.	Compliant	Validation demonstrates that all aspects of the requirement have been implemented and that the broader objective of the requirement has been fulfilled.
ii.	Meaningful progress:	Validation demonstrates that significant aspects of the requirement have been implemented and that the broader objective of the requirement has been fulfilled.
iii.	Inadequate progress	Validation demonstrates that significant aspects of the requirement have not been implemented and that the broader objective of the requirement is not fulfilled.
iv.	No progress	Validation demonstrates that all or nearly all aspects of the requirement have not been implemented, and that the broader objective of the requirement is far from being fulfilled.

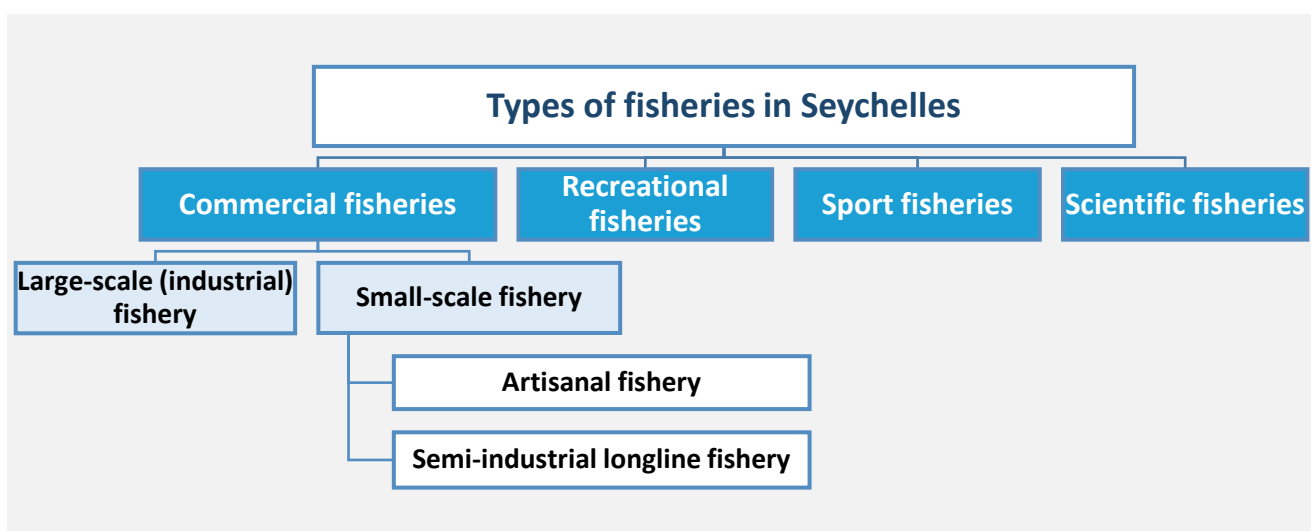
Furthermore, in accordance with Guidance Note #3 on ‘Validating countries’, only *mandatory requirements* are subject to this assessment. Nevertheless, where provisions are ‘encouraged’, findings will be stated, but are not considered in the assessment of compliance.

This report does not include an overall assessment of compliance.

2) Overview of the FiTI implementation in Seychelles

Seychelles is an archipelago in the western Indian Ocean, comprising of 115 islands spread over an Exclusive Economic Zone (EEZ) of 1.37 million km². With a land area of just 455 km², its population of 94,000 is mainly concentrated on three islands (i.e. Mahe, Praslin and La Digue). The country's current and future prosperity is uniquely linked to its marine and coastal assets, with fisheries and tourism being the two main pillars of its economy.

In general, there are **four types of fisheries in Seychelles**, as shown below in a simplified illustration.



The Fisheries Act (2014) represents the main piece of legislation providing rights, authorisations, procedures and dispensation for participating in all types of Seychelles' fisheries.

Large-scale (industrial fishery): This fishery is dominated by foreign-owned fishing vessels, namely purse seiners and long-liners. The industrial fishing sector primarily consists of tuna fisheries. Port Victoria is a prime hub for tuna fisheries in the Indian Ocean.

Small-scale (artisanal) fishery: This sub-sector is exclusively reserved for Seychellois, comprising of around 300 licenced fishing vessels. The sub-sector generates a total catch of around 4,000 metric tonnes per year. Only around 10% is exported, as either fresh or frozen products.

Small-scale (semi-industrial longline) fishery: This sub-sector comprises only 35 semi-industrial vessels targeting large pelagic such as swordfish and tuna, bringing in a total catch

of around 1,500 metric tonnes per year. The fish are stored on fresh ice and a majority of the catches from this fishery are exported, except for a small proportion of line fish and tuna.

In view that marine fisheries is such a key contributor to the social, economic and cultural fabric of Seychelles, the sector plays a central role in the nation's developmental agenda, from successive National Development Plans to strategies for socio-economic growth. Seychelles has also prioritised the nationalising of the international agenda for sustainable fisheries, such as the Code of Conduct for Responsible Fisheries of the Food and Agriculture Organisation of the United Nations (FAO).

The strategic plan of the Seychelles Fishing Authority (SFA) for 2018–2020 encouraged greater transparency in fisheries management by enhancing stakeholder participation in discussions on management plans and measures and identifies the need for concerted efforts around public awareness. Similarly, a key objective of the 2019 Seychelles Fisheries Sector Policy and Strategy included the promotion of visibility, transparency, participation and inclusivity in decision-making.

In addition, transparency has become a cornerstone of the country's endeavours to transit towards a sustainable ocean economy; and it is a core principle of the country's 'Blue Economy: Strategic Policy Framework and Roadmap' (2018-2030).

Seychelles has been collaborating with the FiTI since 2015. During its conceptual phase (i.e. July 2015 – April 2017) a representative of the Seychelles government served as a member in the initial International Advisory Council. The country's official commitment to the FiTI was announced at the 1st International Conference of the FiTI in Nouakchott/Mauritania, on 3 February 2016. This commitment was documented in the 'Nouakchott Declaration on the Fisheries Transparency Initiative'.¹⁴

The Seychelles' Cabinet officially endorsed the FiTI following a presentation made by Professor Peter Eigen, founder and former Chair of the FiTI on 7 April 2017.¹⁵ Afterwards, various initial sign-up requirements were completed, such as nominating the Department of the Blue Economy as the *FiTI Lead Ministry*¹⁶, and within this ministry, naming Mr. Philippe Michaud as the country's FiTI National Lead.

¹⁴ https://www.fiti.global/wp-content/uploads/2016/02/FiTI_1stIntConfDeclaration-EN_20160212.pdf

¹⁵ <https://www.statehouse.gov.sc/news/3401/cabinet-business-friday-7th-april-2017>

¹⁶ Initially, the Department of the Blue Economy was located in the office of the Vice-President of the Republic. After a government change in 2020, the Department has been moved to the Ministry of Fisheries and Blue Economy.

These activities also included the establishment of the *Seychelles' FiTI National Multi-Stakeholder Group (MSG)*. Together, this group is responsible for how the FiTI is implemented in Seychelles. The first meeting of the National MSG was held on 22 October 2018 and as of today, the group has met 12 times.

In 2019, a Cabinet paper on the enlargement of the FiTI MSG from the initial 7 to 12 members was approved, based on the demands of the civil society stakeholder group.

In April 2020, the International Board of the Fisheries Transparency Initiative (FiTI) announced its approval of the country's application, making the Seychelles only the second country to be granted the status of a FiTI Candidate country, after Mauritania.¹⁷

In April 2021, Seychelles has officially launched its first ever report to the FiTI (for calendar year 2019), making it the first country in the world to submit such a report.¹⁸ Eight months later, in December 2021, Seychelles published its second FiTI Report (for calendar year 2020).

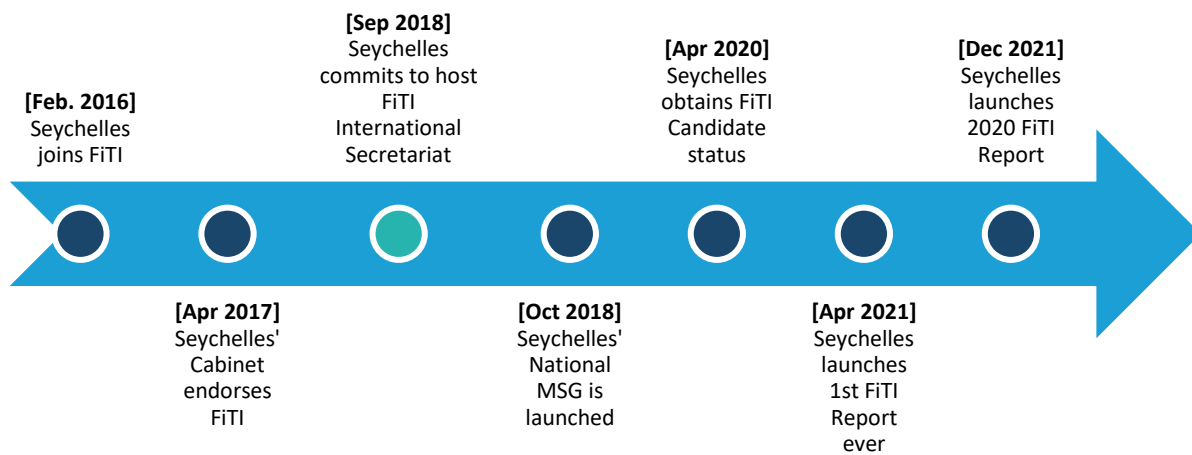
¹⁷ <https://www.fiti.global/seychelles-is-granted-fiti-candidate-country-status>

¹⁸ It needs to be noted that in 2020 the article 'Implementing the Fisheries Transparency Initiative: Experience from the Seychelles' was published in Marine Policy, authored by Benjamin Drakeford, Pierre Failler, Ben Toorabally and Elyes Kooli.

This article includes several factual errors and misleading statements. Most notably – and relevant for this Baseline Assessment Report – the article refers several times to the '*experience of compiling the first FiTI Report for the Seychelles*'. However, no FiTI Report had been compiled for Seychelles at the time of publication of this article. In response to this article, the FiTI International Secretariat brought to the attention of Marine Policy that the article was co-authored by Ms. Kooli and Mr. Toorabally (from Moore Stephens), who were tasked to conduct work on the FiTI in Seychelles in 2018. While the initial Terms of Reference for this work assignment were indeed labelled as work on the first FiTI Report, it was subsequently communicated by the Department of the Blue Economy – and acknowledged by Ms. Kooli (with Mr. Toorabally on cc:) – that their final work product must not be labelled as an official FiTI Report, in order to avoid confusion. In an email by Ms. Kooli to Ms. Fatime Kante from the Department of the Blue Economy on 29 October 2018, it was acknowledged that 'As requested, kindly find attached the report with cover page amended as "Initial Baseline Study" and removed any reference to "Official FiTI report"'. Both co-authors were therefore aware that using the label of a FiTI Report was incorrect.

It was further emphasised that use of such a false and misleading label was more than just an issue of formality, as the article in its entirety portrayed the Seychelles as if the country's FiTI implementation process was not conducted in compliance with the FiTI Standard.

Key milestones of Seychelles' FiTI implementation (2016 – 2021)



At present, the Seychelles' MSG consists of 12 members, equally representing government, business, and civil society, as shown below:¹⁹

Government representatives	Business representatives	Civil society representatives
Mr Roy Clarisse	Mr Keith Andre	Mr Cyril Bonnelame
Hon. Wallace Cosgrow	Mr David Bentley	Ms Gabriella Gonthier
Mr Philippe Michaud ²⁰	Mr Selwyn Edmond	Mr Grant Heyer
Hon. Philip Monthy	Mr Darrell Green	Dr Marie-Thérèse Purvis

Furthermore, Seychelles also included its commitment to implement the FiTI in its first National Action Plan (2019-2021) to the Open Government Partnership → Commitment 3, under the theme 'Transparency'.²¹

¹⁹ <http://www.mofbe.gov.sc/fiti/national-multi-stakeholder-group/>

²⁰ Chair of the National Multi-Stakeholder Group

²¹ <https://www.opengovpartnership.org/documents/seychelles-action-plan-2019-2021/>

3) Assessment of individual ‘transparency requirements’

The assessment of Seychelles’ compliance with the transparency requirements of the FiTI Standard consists of **twelve validation elements**, in accordance with section B.1 of the FiTI Standard. This assessment covers both of Seychelles’ FiTI Reports that fall within the validation timeframe (2019, 2020).

Furthermore, in accordance with the FiTI Principles 4 and 6, and as set out in requirement B.1, implementing countries must report on all FiTI transparency requirements. The public availability of **credible information** is important to ensure that the transparency achieved through the FiTI can result in better fisheries management. Therefore, this section also assesses whether any indication exists that Seychelles has wilfully provided misinformation and/or wilfully withheld accurate information, acts which would be considered to constitute a fundamental breach of the initiative’s **principles, requirements and spirit**.

Public Registry of National Fisheries Laws, Regulations and Official Policy Documents

The objective of this requirement is to ensure public access to all aspects of the legal and regulatory framework around which Seychelles’ fisheries sector is structured.

ID	Validation indicator	Scoring
B.1.1_1	The implementing country must provide an online, up-to-date registry of all national legislation and official policy documents related to the marine fisheries sector.	<i>Compliant [3]</i>
B.1.1_2	The National MSG must decide on which areas of fisheries this applies to; however, at a minimum, copies of national laws, decrees and policy documents on fisheries management, trade and investment, as well as fisheries management plans must be included.	<i>Meaningful progress [2]</i>
		<i>Compliant</i> <i>[Avg. 2.5]</i>

Detailed remarks:

- ➡ **[B.1.1_1]** At the beginning of the validation timeframe, no such online, up-to-date registry existed in Seychelles.

As part of the country's FiTI reporting efforts, a consolidated list of national legislation and official policy documents was published in the 2019 FiTI Report. During the 2020 FiTI reporting process, this list was made publicly accessible on a new sub-page of the website of the Ministry of Fisheries and Blue Economy (MoFBE) in September 2021.²² This list includes previously unpublished laws, regulations and policy documents (as PDF copies).²³

This new sub-page does not feature any information summarising published laws, regulations and policy documents – or the dates they were first introduced – and thus, negatively impacts the registry's capacity to facilitate public understanding. However, this is not a requirement of the FiTI Standard and does therefore not affect the scoring for this requirement.

Unfortunately, the website of the previous Ministry of Fisheries and Agriculture²⁴ is also still active and appears prominently in various external search engines (e.g. Google), creating confusion around which government website is current and in active use. This old website should therefore be deactivated.

- ➔ **[B.1.1_2]** It is not documented whether the National MSG decided on which areas of fisheries this transparency requirement applies to (partially due to the unavailability of meeting minutes from the first seven National MSG meetings). However, various regulations and policies of Seychelles' marine fisheries sector are covered, including fisheries legislations, fisheries-related legislations, fisheries policies, fisheries-related policies, fisheries plans and strategies, as well as other documents (e.g. fisheries aquaculture regulation). The list also includes PDF copies of the main international treaties, policy instruments and best practices to which Seychelles is signatory or adhering.

²² <http://www.mofbe.gov.sc/fisheries-legislations-and-regulations/>
<http://www.mofbe.gov.sc/fisheries-and-related-policies/>
<http://www.mofbe.gov.sc/plans-strategies-and-other-documents/>

Furthermore, the main fisheries laws and regulations are also published on the website of the Seychelles Fisheries Authority (SFA).

²³ Publishing a list of national and international fisheries laws, regulations and official policy documents was a recommendation from the National MSG, made in its 2019 FiTI Report [ID: 2019-1_1; Priority: High; Due date: December 2021].

The Seychelles' eGovernment Portal, managed by the Department of Information Communications Technology (DICT), still does not include any laws, policy documents or management plans related to marine fisheries.

²⁴ <http://mofa.gov.sc>

Fisheries Tenure Arrangements

The objective of this requirement is to ensure public access to information about how fishing rights are accessed, used, and managed across Seychelles' marine fisheries. Official rules on tenures arrangements are one of the most critical aspects of sustainable fisheries management because they influence the sector's social, ecological and economic impacts.

ID	Validation indicator	Scoring
B.1.2_1	The implementing country must publish a summary description of laws and decrees on fisheries tenure arrangements, including information as specified in requirement B.1.2 of the FiTI Standard.	<i>Compliant [3]</i>
B.1.2_2	In case tenure, access or user rights are not codified, information on the current and planned approaches to securing such rights must be published.	<i>Not applicable</i>
		<i>Compliant</i> <i>[Avg. 3.0]</i>

Detailed remarks:

- ➔ **[B.1.2_1]** At the beginning of the validation timeframe, no summary descriptions of laws and decrees regarding fisheries tenure arrangements were published online by national authorities. Most information was publicly available, but spread across several different regulations and policy documents.

As part of the country's FiTI reporting efforts, SFA published summary descriptions relating to the country's four main fisheries (i.e. commercial, recreational, sport, scientific) on its website in November 2021²⁵ – including information on fees payable, duration, fishing conditions, transferability and divisibility of such rights. This is the first time that such information has been made accessible to the wider public in Seychelles.²⁶ To further facilitate public understanding around this complex matter, SFA broke the summary descriptions down into an intuitive FAQ format. The descriptions published on SFA's website are based on the comprehensive summary descriptions that were compiled by the National MSG as part of the country's 2019 FiTI Report. This work was undertaken as the National MSG recognised that – in the absence of well-explained

²⁵ <https://www.sfa.sc/index.php/faqs>

²⁶ Publishing these summary descriptions of tenure arrangements online was a recommendation from the National MSG, made in its 2019 FiTI Report [ID: 2019-2_1; Priority: High; Due date: December 2021].

summaries for each of Seychelles' fisheries – public understanding of how the sector works is negatively impacted.

Rules and procedures for Seychelles-flagged vessels to obtain authorisations to fish in a third country or the High Seas, along with the reporting requirements and the provisions for terminating such authorisations, have so far only partially implemented, despite a recommendation from the National MSG to do so by September 2021 [ID: 2019-2_4; Priority: High]. While the application form, containing application conditions, is now published on the SFA website, reporting requirements and provisions for terminations are still missing.

Furthermore, the National MSG identified an additional aspect to strengthen transparency around tenure arrangements:

- ➡ Fees that need to be paid for all types of fisheries rights existing under the law, including changes to current fee structures need to be published in the Official Gazette [ID: 2019-2_2; Priority: High; Due date: December 2021] → This recommendation has not been implemented yet; the 2020 FiTI Report states that national authorities deferred implementation to 2022.

Given the significant progress that has been shown by Seychelles' national authorities in providing online information around the way fishing rights are accessed, used, and managed in the country, the FiTI International Secretariat assesses that the broader objective of this requirement has been fulfilled or is in the process of being fulfilled, and therefore – despite the information gaps shown above – merits the assignment of a 'Compliant' compliance designation.

[Efforts that exceed the requirements of the FiTI Standard] SFA published detailed licence information regarding the sea cucumber fishery online on its website.²⁷ This again was triggered by findings of the National MSG during the 2019 FiTI reporting process, recognising significant opacity around the procedures for participation in the sea cucumber fishery of Seychelles, particularly when compared to the spiny lobster fishery, which is much more transparent.

²⁷ <https://www.sfa.sc/index.php/services1/fishing-licence/small-scale-fisheries-licences/summary/54-small-scale-fisheries-licences/152-small-scale-fisheries-licences-2020>

Publishing a list of all fisheries permit holders online (including for the sea cucumber fishery), with information on the type of permit they hold, fees which have been paid and the start and end date of their permit(s) was a recommendation from the National MSG, made in its 2019 FiTI Report [ID: 2019-2_3; Priority: High; Due date: September 2021].

- ➔ **[B.1.2_2]** As part of the newly published tenure arrangement section, information related to access and use of traditional sites and fishing for cultural use has also been addressed. The information provided notes that there are no ‘traditional sites’ in Seychelles related to fisheries, apart from the known fishing ports and landing sites scattered around various districts. As a result, there are no regulations designed to protect access to these sites. As many fishing vessels are accessed from the beach, the law guarantees free access to all of Seychelles’ beaches and, where the beach is enclosed by private property, for the owner to provide reasonable access to the beach.

Foreign Fishing Access Agreements

The objective of this requirement is to ensure public access to all contractual arrangements that Seychelles has entered into with any foreign party. Transparency around access agreements provides the basis for public awareness of the rights enjoyed and responsibilities assumed by foreign fishing vessels operating in Seychelles’ marine jurisdictional waters, as well as Seychelles-flagged fishing vessels operating in the waters of third countries.²⁸

ID	Validation indicator	Scoring
B.1.3_1	The implementing country must publish the contracts of all foreign fishing access agreements, including their associated protocol(s). ²⁹	Meaningful progress [2]
B.1.3_2	The implementing country must publish studies or reports undertaken by national authorities or foreign parties to an agreement providing evaluation or oversight of the agreement, if available.	Compliant [3]
B.1.3_3	The implementing country must publish documentation derived from any national stakeholder consultation undertaken with respect to the preparation, negotiation or monitoring of the agreements, if available.	Inadequate progress [1]
		<u>Meaningful progress</u> [Avg. 2.0]

²⁸ These agreements provide compensation to the coastal state for fishing opportunities in its waters, such as monetary transfers, commitments for investments and services, or reciprocal access to overseas fishing grounds for the coastal state’s national fishing fleet.

²⁹ This includes agreements that allow access for foreign vessels to fish in the country’s marine jurisdictional waters (i.e. Territorial Sea and Exclusive Economic Zone) as well as agreements that allow nationally-flagged vessels to fish in a third country.

Detailed remarks:

- ➡ **[B.1.3_1]** At the beginning of the validation timeframe, no foreign fishing access agreements were published online by national authorities, nor was it even known in the public how many of such agreements existed.

Due to the FiTI reporting processes, SFA has now published the latest agreements signed between Seychelles and the *European Union*, between Seychelles and *Mayotte (EU)*, as well as both access agreements signed with the government of *Mauritius*, which allow Seychelles-flagged vessels to fish in Mauritian waters and Mauritius-flagged vessels to fish in Seychelles' waters. These documents have all been uploaded onto its website (as PDF copies).³⁰

Furthermore, both FiTI Reports state the total number, names and contractual parameters for most of these agreements. Such a summary overview has not yet been published online on a government website.

The private fishing access agreements signed between Seychelles and the *Taiwan Deep-sea Tuna Longline Boat Owners and Exporters Association (TTA)* and *Top Fortune International (TFI)* – granting access of foreign vessels to fish in Seychelles' waters – have not been published online yet. Both agreements contain contractual provisions which prevent Seychelles from divulging the contents of the agreements without the prior knowledge and written approval of the other party. It should be noted that their non-publication does not constitute an act of non-compliance with the FiTI Standard yet, as it is stated in section B.1.3 that:

'Foreign fishing access agreements that are already in force by the time a country reaches the status of a FiTI Candidate country, and for which there is an agreement or expectation of confidentiality between the parties to this agreement, must be made public within 3 years from becoming a FiTI Candidate country.'

Thus, the government of Seychelles must publish these agreements by 2023 latest. Given that these agreements are typically renewed on an annual basis, the government has committed to pursue the removal of such confidentiality clauses from future fisheries access agreements. This matter has not been resolved between the 2019 and the 2020 FiTI Reports (both published in 2021), and therefore should be reflected in Seychelles next, 2021 FiTI Report (to be published by end of 2022).

³⁰ <https://www.sfa.sc/index.php/e-library/fisheries-legislation-other-fisheries-related-documents>

Finally, the status regarding the private access agreement with *Dongwon Industries Co. Ltd* remains unclear, as it appears there is no written agreement formalising the agreement Seychelles signed with this company. This situation was already identified during the 2019 FiTI reporting process, and was still not resolved as part of the 2020 FiTI reporting process (although was clearly recognized).³¹

It should be highlighted that the National MSG recognised in Seychelles' 2019 FiTI Report the often misinformed public debates concerning the various fishing access agreements Seychelles has signed with foreign parties. *The National MSG invested additional effort to improve public understanding of this issue by summarising key information from each of the agreements active in 2019 in tabular form* (included as part of the FiTI Report's annex). This was with the objective of facilitating informed comparisons of the different agreements and their contents. The 2020 FiTI Report updated this table, but because information from some of these private access agreements was still not available at the time of the 2020 FiTI Report's publication, the conclusions that can be drawn from this comparison are limited.

- ➔ **[B.1.3_2]** Only the EU-Seychelles agreement has been subject to an evaluation. At the beginning of the validation timeframe, Seychelles' national authorities had not made this report accessible to the wider public.³²

As part of the FiTI reporting process, this report is now available on the SFA website.³³ Furthermore, a second evaluation report has been provided, and is also publicly available on the same website.³⁴

Both reports do not assess the compliance of signatories with the terms and conditions of the EU/Seychelles fisheries agreements. As part of this FiTI reporting process, the MoFBE indicated that a mechanism is being established for improved monitoring of the

³¹ Publishing all foreign fishing access agreements and associated protocols online was a recommendation from the National MSG, made in its 2019 FiTI Report [ID: 2019-3_1; Priority: High; Due date: December 2021].

³² 'Performance audit evaluation of the implementation of the sectoral support provided for the years 2014 and 2015 under the 2014-2020 protocol of the EU/Seychelles Fisheries Partnership Agreement'
This report focused primarily on the implementation of Seychelles' activities financed by the agreement during 2014 and 2015, and on issues which have been affecting performance related to budget execution at the SFA.

³³ <https://www.sfa.sc/index.php/e-library/fisheries-report/category/22-eu-sey-performance-audit>

³⁴ The report 'Performance audit evaluation of the implementation of the sectoral support provided under the 2014-2020 protocol of the EU/Seychelles Fisheries Partnership Agreement' was prepared in 2021. This report focused mostly on the implementation of projects funded under the protocol of the EU/Seychelles Fisheries Partnership Agreement with a strong focus on the level of impacts being generated by funded infrastructure projects.

sectoral support Seychelles receives under the protocol of the EU/Seychelles Sustainable Fisheries Partnership Agreement.

[Best available information] The 2020 FiTI Report also clearly states that the National MSG found no instances where information provided by national authorities in assessments of the impact of these access agreements is misleading. Likewise, the National MSG found no instances where the accuracy of information in these assessments could be improved by considering alternative sources, such as studies by non-governmental organisations, the private sector or academic institutions.

- ➡ **[B.1.3_3]** No information is published online by Seychelles' national authorities regarding stakeholder discussions and consultations prior to (re)negotiation and signing of new foreign fishing access agreements. This is despite the fact that the MoFBE stated that minutes of discussions prior to 2020 have been recorded. However, as part of the 2019 FiTI reporting process, the MoFBE also indicated that up to 2019, all discussions have been conducted primarily within government, through the involvement of different governmental ministries and agencies. Representatives of local fisher associations were only consulted in certain cases.

It needs to be emphasised that such a lack of stakeholder involvement has generated regular controversies in Seychelles, in particular stemming from concerns voiced by the country's small-scale fishing community. The involvement of a variety of stakeholders as well as public access to subsequent discussions and protocols etc. should be closely monitored during future validations.

The importance of such information being publicly available was addressed by the National MSG, which recommended in the 2019 FiTI Report that MoFBE should publish information from previous (prior to 2019) and recent national stakeholder consultations undertaken with respect to the preparation, negotiation or monitoring of foreign fishing access agreements, and that future national stakeholder consultations should be published in a timely manner [ID: 2019-3_4; Priority: Medium; Due date: December 2022). As the suggested due date for addressing this recommendation falls outside this validation, it will only be reviewed during the country's next validation.

The State of the Fisheries Resources

The objective of this requirement is to enhance public access to information regarding the health of Seychelles' marine fisheries resources. This is particularly important for fish targeted

by commercial fisheries, given that their overfishing can put unsustainable pressure on stocks whose abundance is essential for ensuring national development and food security.

ID	Validation indicator	Scoring
B.1.4_1	The implementing country must publish the most recent national reports on the state of fish stocks, including any information on trends in the state of stocks and conclusions on the reasons for change, as well as studies or reports undertaken by national authorities that assess the sustainability of fishing.	Compliant [3]
B.1.4_2	The implementing country must provide information on the methods and data used to assess fish stocks.	Compliant [3]
B.1.4_3	The implementing country must publish on ongoing or planned efforts to update and expand fish stock assessments.	Compliant [3]
		Compliant [Avg. 3.0]

Detailed remarks:

➡ **[B.1.4_1]** At the beginning of the validation timeframe, no comprehensive national report on the state of fish stocks was provided by the government of Seychelles, nor did the government publish online existing stock assessment reports for species that fall within its management mandate (i.e. demersal species, semi-pelagic species, lobster, sea cucumber).

In the 2019 FiTI Report, the National MSG recommended that SFA should prepare and publish a periodic (e.g. biennial) report on the state of the main commercial fish stocks in Seychelles.³⁵ The deadline for addressing this recommendation is December 2022 and, thus, falls outside of this validation timeframe.

As part of the 2020 FiTI reporting process, SFA published stock status summaries of fish species that have been assessed within the last four years on its website (including those that fall under the management mandate of the IOTC).³⁶ Publishing this information

³⁵ The FiTI Standard does not require countries to provide such reports, if other means are used to communicate the state of fisheries resources.

³⁶ <https://www.sfa.sc/index.php/e-library/fisheries-report?task=download.send&id=153&catid=53&m=0>
Stock assessments of tuna and tuna-like species targeted by the industrial longline and purse seine fishery fall under the responsibility of the Indian Ocean Tuna Commission (IOTC). The latest stock status information for species under the IOTC management mandate are published on the IOTC Stock Status Dashboard.

fulfilled the National MSG's recommendation 2019-4_1 from its 2019 FiTI Report [Priority: High; Due date: June 2021].

It is highlighted that the National MSG acknowledged the importance of information on stock status and included *a summary table of the latest available information in both FiTI Reports, using easy-to-understand colour-coding to indicate the health of fish stocks.*

[Best available information] The 2020 FiTI Report states clearly that the National MSG found no instances relating to the state of fisheries resources where information published by national authorities is clearly misleading. Likewise, the National MSG found no instances where published information could be improved by considering alternative sources, such as studies by non-governmental organisations, the private sector, or academic institutions.

- ➔ **[B.1.4_2]** Details of the methods used to undertake the stock assessments are available as part of either the detailed reports published online by Seychelles' national authorities or the IOTC.
- ➔ **[B.1.4_3]** As part of the 2020 FiTI reporting process, SFA published its work programme for future stock assessments up to the year 2024, fulfilling the National MSG's recommendation 2019-4_3 [Priority: High; Due date: December 2021].³⁷ The work programme also provides a link to the IOTC schedule of future stock assessments up to 2024.

Large-Scale Fisheries

The objective of this requirement is to enhance public access to information regarding the industrial fishing vessels allowed to fish in Seychelles' jurisdictional waters (and for Seychelles-flagged vessels in third country waters/on the High Seas), as well as how much these vessels pay for fishing opportunities and the quantities of fish they are catching.

ID	Validation indicator	Scoring
B.1.5_1	The implementing country must provide an online, up-to-date registry of all nationally-flagged and foreign-flagged	Meaningful progress [2]

<https://iotc.org/node/3379> Unfortunately, no link to the IOTC dashboard is provided on the website of the MoFBE or the SFA yet.

³⁷ <https://www.sfa.sc/index.php/fisheries/state-of-the-fisheries-resources/state-of-the-fisheries-resources-2?task=download.send&id=161&catid=58&m=0>

ID	Validation indicator	Scoring
	large-scale vessels authorised to fish in the country's marine jurisdictional waters, and of all nationally-flagged large-scale vessels authorised to fish in third countries' marine jurisdictional waters and on the High Seas, including information on 14 attributes, as listed in section B.1.5 of the FITI Standard.	
B.1.5_2	The implementing country must publish accessible and complete information on payments made by each vessel listed in the vessel registry for their fishing activities, including information on 4 attributes, as listed in section B.1.5 of the FITI Standard. ³⁸	Compliant [3]
B.1.5_3	The implementing country must publish information on the quantity of annual recorded retained catches by nationally-flagged vessels listed in the vessel registry, including according to species or species groups, disaggregated by fishing authorisations or gear type as well as marine jurisdictional waters, High Seas and third country waters, presented for the flag state.	Compliant [3]
B.1.5_4	The implementing country must publish information on the quantity of annual recorded retained catches by foreign-flagged vessels listed in the vessel registry according to species or species groups, disaggregated by fishing authorisations or gear type, presented for each flag state separately.	Compliant [3]
B.1.5_5	The implementing country must publish information on the quantity of annual recorded landings in national ports according to species or species groups caught in the country's marine jurisdictional waters, disaggregated by fishing authorisations or gear types, presented for each flag state separately.	Compliant [3]
B.1.5_6	The implementing country must publish information on the quantity of annual recorded transshipments at sea or landings in foreign ports according to species or species groups caught in the country's marine jurisdictional waters, disaggregated by fishing authorisations or gear types, presented for each flag state separately.	Meaningful progress [2]

³⁸ Information on payments to port authorities must be separated from payments for fishing activities.

ID	Validation indicator	Scoring
B.1.5_7	The implementing country must publish information on recorded quantities of discards according to species or species groups, disaggregated by fishing authorisations or gear types, presented for each flag state separately, if available. ³⁹	Meaningful progress [2]
B.1.5_8	The implementing country must publish the most recent studies and reports on recorded fishing effort by vessels, disaggregated by fishery or gear type and by flag state, if available.	Meaningful progress [2]
B.1.5_9	The implementing country must publish evaluations or audits of the economic, social and food security contribution of the large-scale fishing sector, if available.	Not collated
		<u>Compliant</u> [Avg. 2.5]

Detailed remarks:

Seychelles' laws and regulations do not give a definition of large-scale commercial fishery. However, commercial *small-scale* fisheries is defined in the Fisheries Comprehensive Plan. Therefore, the National MSG determined that the large-scale commercial fishery in Seychelles can be defined as any commercial fishery which does not fall under the small-scale fisheries definition.

➡ **[B.1.5_1]** At the beginning of the validation timeframe, Seychelles' national authorities did not publish their own online registry of large-scale vessels authorised to fish in the country's waters. This is despite the fact SFA maintained an internal vessel registry in its own records to fulfil regular reporting obligations to the IOTC.

As part of the 2020 FiTI reporting process, SFA compiled and published online a spreadsheet with details of all large-scale fishing vessels licenced to fish in Seychelles' waters in 2020, as well as Seychelles-flagged vessels operating in third countries.⁴⁰ This registry contains information on all 14 vessel registration attributes as well as licence payment information in line with the requirements of the FiTI Standard (see below).

³⁹ This must include information on how information on discards is gathered by national authorities.

⁴⁰ <https://www.sfa.sc/index.php/services1/fishing-licence>

Publishing this registry fulfilled the National MSG's recommendation 2019-5_1 from its 2019 FiTI Report [Priority: High; Due date: September 2021].

The 2020 FiTI Report clearly states the instances where vessel registration attributes do not follow the FiTI Standard. This is most notable for details of the company that owns the vessel. The National MSG stated its uncertainty around whether information provided in the registry accurately reflects the real legal owner of the vessel, or their agent(s). Also, information about the legal owner of the licenced vessel does not include the owner's nationality. It is therefore not possible to make comparisons between the flag State of the licenced large-scale vessels and their legal ownership. This is potentially confusing for the general public, who could misinterpret flag State with ownership, and therefore assume that Seychelles-flagged vessels are owned by Seychellois.

Furthermore, the 2020 FiTI Report makes transparent that SFA does not clearly indicate the beneficial owner of the vessel and – while not required by the FiTI Standard – this is a clear contradiction to Paragraph 8(2)(r) of the Fisheries Act which states:

'the Record of fishing vessels shall contain the name, address and nationality of any person with beneficial ownership of the fishing vessel.'

Additional minor data gaps or discrepancies between the information recorded in this registry and other government sources (e.g. Fisheries Statistical Report) are also discussed in the 2020 FiTI Report.

Given that important information on ownership is available to Seychelles' national authorities (as stipulated above), but not included in the vessel registry, the FiTI International Secretariat assesses this requirement as 'Meaningful progress'. However, given the overall progress that has been made during this validation timeframe, this assessment is made with some reservations, and the compliance designation of 'Compliant' could also have been justified.

- ➔ **[B.1.5_2]** At the beginning of this validation timeframe, the government of Seychelles had not published online any information on payments made by large-scale fishing vessels for the year 2019. However, this information was being collated by SFA and kept in an accounting software and also on physical files.

During the 2020 FiTI reporting process, SFA published online the licence payments made by large-scale fishing vessel operators, allowing them to fish in Seychelles' waters in calendar year 2020. This information is published on a *per vessel basis* as part of the large-scale vessel registry (see above). Linking the vessel registry directly with licence

information fulfilled the National MSG's recommendation 2019-5_2 made in its 2019 FiTI Report [Priority: High; Due date: September 2021].

- ➡ **[B.1.5_3]** Prior to this validation timeframe, data on retained catches from Seychelles-flagged large-scale fishing vessels was already available online, published in the Fisheries Statistical Reports. The published retained catch data (from both the purse seiner and industrial longline fisheries) is disaggregated by a number of attributes, fulfilling the requirements of the FiTI Standard.

Both FiTI reporting processes made transparent the fact that the catch information for the industrial longline fishery must be seen as incomplete (e.g. *due to unreturned logbooks*). The lack of information and explanations for the situation are also clearly stated in both reports. This lack of information is not seen as the result of the government of Seychelles wilfully withholding information. Instead, it is caused by delays in providing such data to the authorities. In September 2021, SFA updated the catch and effort data for the year 2019⁴¹; this updated information was also included in the 2020 FiTI Report.

Nevertheless, the issue of vessels not returning their logbooks and the fact that there are no penalties in place for non-return undermines the credibility of the publicly accessible catch data.

- ➡ **[B.1.5_4]** Prior to this validation timeframe, data on retained catches from foreign-flagged large-scale vessels fishing in Seychelles' waters was already available online, published as part of the Fisheries Statistical Reports. The published retained catch data (from both the purse seine and industrial longline fisheries) is disaggregated by a number of attributes, fulfilling the requirements of the FiTI Standard.

Similar to annual retained catches from Seychelles-flagged vessels (see above), both FiTI reporting processes made transparent that catch data from foreign-flagged fishing vessels must also be seen as incomplete for the industrial longline fishery (e.g. *due to unreturned logbooks*). The lack of information and its underlying reasons are clearly stated in both reports.

- ➡ **[B.1.5_5]** Prior to this validation timeframe, data on annual recorded landings and transshipments in national ports from vessels operating in Seychelles' large-scale

⁴¹ Through the Semester 1 Fisheries Statistical Report (2020) based on 98% logbook return for Seychelles, 99% for Taiwan (POC) and 96% for China.

fisheries was already available online, published in the Fisheries Statistical Reports. The published data is disaggregated by a number of attributes, fulfilling almost all requirements of the FiTI Standard.

The only FiTI requirement that is not covered relates to data not being disaggregated in a manner that would allow catches made in Seychelles' waters to be separated from those made in other national jurisdictions or on the High Seas. The National MSG was informed that *this transparency requirement poses a practical challenge*, as catches made in different locations are stored in the same wells of the vessels and can therefore not be physically separated. Consequently, this data required to cover this attribute is seen as being not collated by national authorities and does therefore not impact this assessment.

Similar to annual retained catches (see above), both FiTI reporting processes made transparent that recorded landings and transshipments in national ports must also be seen as incomplete for the industrial longline fishery, due to unreturned logbooks, as well as due to technical software issues. The lack of information and its underlying reasons are clearly stated in both reports.

- ➔ **[B.1.5_6]** Prior to this validation timeframe, data on annual recorded transshipments at sea or landings in foreign ports from large-scale fisheries was already available online, published in the Fisheries Statistical Reports.

Similar to landings and transshipments in national ports (see above), this data for foreign ports cannot be disaggregated in a manner that would allow catches made in Seychelles' waters to be separated from those made in other national jurisdictions or on the High Seas. Following the same justification, this data attribute is therefore considered to not be collated by national authorities and does therefore not influence the validation outcome.⁴²

Furthermore, published data on landings and transshipments in foreign ports by the purse seiner fishery is not disaggregated by flag State, despite the fact that this information is collated by SFA, as landings and transshipments in foreign ports are minimal compared to national ports.

Data for the industrial longline fishery has not been published by Seychelles' authorities at all, despite the fact that the majority of data is being collated by SFA. SFA claims that their level of confidence in the data is low as they do not have a system in place to assess

⁴² Data from the purse seiner fishery is not disaggregated by flag State, despite the fact that this information is collated by SFA, as landings and transshipments in foreign ports are minimal compared to national ports.

the accuracy of the data. The lack of information and its underlying reasons are clearly stated in both reports.

- ➔ **[B.1.5_7]** Prior to this validation timeframe, data on annual recorded discards was already available online, published in the Fisheries Statistical Reports.

However, both FiTI Reports clearly stated that the published information must be seen as incomplete, as the published data relates only to information from the purse seiner fishery; no information from the industrial longline fishery is available yet.

Furthermore, the published information on discards from the purse seiner fishery is not disaggregated by species or flag State, as required by the FiTI Standard.

Both FiTI Reports also state that Seychelles' authorities had not undertaken work to verify the accuracy of discard information, and that there is currently no official published information on how discard data is collected.

- ➔ **[B.1.5_8]** Prior to this validation timeframe, data on fishing effort by large-scale vessels was published online, through the Fisheries Statistical Reports. For both, the purse seiner and industrial longline fisheries, SFA collects and archives data on fishing effort by individual vessel. However, the authorities have never published such data.

As part of the FiTI reporting processes, such information is now published in the FiTI Reports. However, both FiTI Reports clearly state that the published information must be seen as incomplete, as the published data only reflects several months of available data, as well as the already-stated issues with unreturned logbooks.

[Best available information] The National MSG found no instances relating to the assessments of catches and information on by-catch/discards, where information used by national authorities is clearly misleading, or could be improved by considering alternative sources of information, such as studies by non-governmental organisations, the private sector or academic institutions.

- ➔ **[B.1.5_9]** Prior to this validation timeframe, evaluations of the *economic* contribution of the large-scale fishing sector have only been partially undertaken and published, as part of the fisheries sector contribution to Seychelles' Gross Domestic Product.

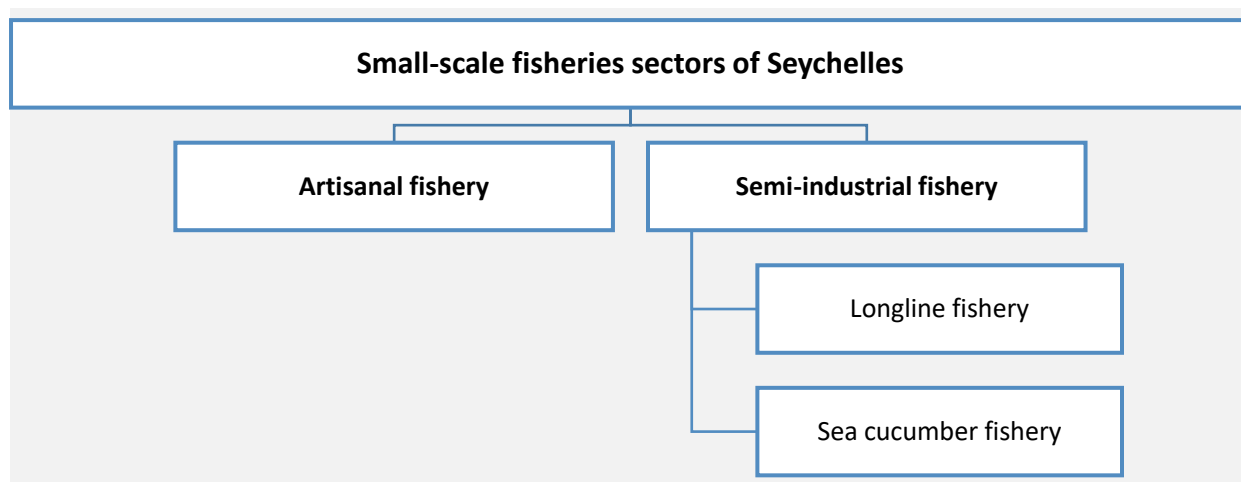
The *social* contribution of the large-scale fishing sector has received less attention than its economic contribution. The 2019 FiTI Report states several indicators and statistics, but no comprehensive evaluation or audit report exists.

Similar, there are no official publications by Seychelles' government on the *food & nutrition security* contribution of the large-scale fishing sector.

[Best available information] The National MSG found no instances relating to the assessments of catches and information on evaluations of social and economic impacts of Seychelles' large-scale fisheries, where information used by national authorities is clearly misleading, or could be improved by considering alternative sources of information, such as studies by non-governmental organisations, the private sector or academic institutions.

Small-Scale Fisheries

The objective of this requirement is to enhance public access to information around the scope as well as economic, social and food & nutrition contributions of Seychelles' small-scale fisheries.



ID	Validation indicator	Scoring
B.1.6_1	The implementing country must publish information on the total numbers of small-scale fishing vessels, disaggregated according to categories of fishing or gear types.	Compliant [3]
B.1.6_2	The implementing country must publish information on the total number of fishing licenses issued to small-scale fishing vessels, disaggregated according to categories of fishing authorisations.	Compliant [3]

ID	Validation indicator	Scoring
B.1.6_3	The implementing country must publish information on the total numbers of fishers engaged in the fishing sector, indicating the gender of fishers and the proportion that are engaged in full-time work, seasonal or part time fishing, occasional fishing or recreational fishing.	<i>Compliant [3]</i>
B.1.6_4	The implementing country must publish information on the total payments made from small-scale fisheries related to fishing authorisations, catches and landings, disaggregated according to categories of fishing authorisations or gear types and indicating the recipient of these payments.	<i>Compliant [3]</i>
B.1.6_5	The implementing country must publish information on the quantity of catches, disaggregated according to species, categories of fishing authorisations and gear types.	<i>Inadequate progress [1]</i>
B.1.6_6	The implementing country must publish information on the total volumes of discards, disaggregated according to species, categories of fishing authorisations and gear types.	<i>Not collated</i>
B.1.6_7	The implementing country must publish evaluations or audits of the economic, social and food security contribution of the small-scale fisheries sector, if available.	<i>Not collated</i>
		<i>Compliant</i> <i>[Avg. 2.6]</i>

Detailed remarks:

Small-scale fisheries in Seychelles (often also referred to as local fisheries) is defined in the Fisheries Comprehensive Plan as 'a fishery using vessels less than 24 metres in length overall carrying out fishing activities within Seychelles' territorial waters and EEZ and to a lesser extent on the high seas.'

- ➔ **[B.1.6_1]** Prior to this validation timeframe, information on small-scale vessels was available to the Seychelles' government and published online in its Fisheries Statistical Report 2019.⁴³ This includes the total number of active vessels, as well as breakdowns according to sub-sectors and vessel type. A breakdown according to gear types is not provided, as many boats in the small-scale fisheries are multi-gear.

⁴³ The National MSG noticed that Seychelles' fisheries legislation is silent on the need to publish information on the number of vessels operating in the small-scale fisheries.

As part of the 2020 FiTI reporting process, SFA has published a downloadable spreadsheet document on its website displaying lists of all small-scale fishing vessels registered in Seychelles, together with the corresponding small-scale fishing vessel licences and fishing activity licences⁴⁴.

- ➡ **[B.1.6_2]** Prior to this validation timeframe, information on small-scale fishing licenses was not published online, besides for the restricted access lobster fishery. Legally, the Fisheries Act does not list any requirements to publish issued fishing licences.

As stated above, as part of the 2020 FiTI reporting process, SFA has published a downloadable spreadsheet document on its website displaying lists of all small-scale fishing vessels registered in Seychelles, together with the corresponding small-scale fishing vessel licences and fishing activity licences. Publishing such license information fulfilled the National MSG's recommendation 2019-6_1 made in its 2019 FiTI Report [Priority: High; Due date: September 2021].

- ➡ **[B.1.6_3]** Prior to this validation timeframe, information on small-scale fishers was not published online, even though it was collated by the government.⁴⁵

As part of both FiTI reporting process, data on licenced fishers and boat owners has been provided by SFA to the Report Compiler and subsequently published in the 2019 and 2020 FiTI Reports. This includes the total number of fishers, as well as breakdowns according to gender and type of fishers. Both FiTI Reports also state that no information is collected regarding the numbers of occasional or part-time fishers in Seychelles.

Publishing information regarding small-scale fishers fulfilled the National MSG's recommendation 2019-6_1 made in its 2019 FiTI Report [Priority: High; Due date: September 2021].

- ➡ **[B.1.6_4]** Prior to this validation timeframe, information on payments from small-scale fisheries was not published online, even though it was collated by the government.

As part of the 2020 FiTI reporting process, SFA made available to the National MSG information (on a per vessel basis) regarding the payments made by the small-scale

⁴⁴ <https://www.sfa.sc/index.php/services1/fishing-licence/small-scale-fisheries-licences/summary/54-small-scale-fisheries-licences/152-small-scale-fisheries-licences-2020>

⁴⁵ SFA keeps track of the number of registered fishers through its fishermen registration list. However, occasional and part-time fishers who are not registered are not listed in the system.

sector for the year 2020 for vessel licences and fishing activity licence fees. The total amount is stated in the 2020 FiTI Report.

[Efforts that exceed the requirements of the FiTI Standard] SFA has published payment information from its small-scale fisheries on a per vessel basis, supporting public access to detailed payment information.

- ➡ **[B.1.6_5]** Prior to this validation timeframe, information on catches by the small-scale sector was published by the Seychelles' government as part of its Fisheries Statistical Report 2019. This includes the total number of catches, as well as breakdowns according to according to species (except for demersal fisheries), categories of fishing authorisations and gear types.

However, the National MSG stated that this information cannot be seen as complete, as for the artisanal fishery, the published catch data only accounts for a certain time period, and no catches from the sea cucumber and lobster fisheries are included. No further information was provided that explain these information gaps.

Furthermore, catch data is disaggregated by vessel type, month, gear type and species groups, but not by individual species.

- ➡ **[B.1.6_6]** Information on discards by the small-scale fisheries sector is not collated by the government of Seychelles, as the volume of discards in these fisheries is typically seen as very small.

- ➡ **[B.1.6_7]** No evaluation or audits of the economic, social and food security contribution of the small-scale fisheries sector has been conducted by Seychelles' authorities. A market and gap analysis study from 2014 on the food security contributions of the small-scale fisheries sector has not been published yet.

This lack of information was addressed in a recommendation made by the National MSG to SFA in the country's 2019 FiTI Report [ID: 2019-6_2; Priority: High; Due date: December 2022].

Post-Harvest Sector and Fish Trade

The objective of this requirement is to enhance public access to key information in the post-harvest value chain, in particular the scope of Seychelles' reliance on fish-related import and exports. Fish is the most traded agricultural product in the world (in monetary terms),

providing an important source of revenues and foreign exchange. The inflow and outflow of fish from a country also has substantial implications on the availability of food, contributing to national food security.

Furthermore, this requirement includes employment-related information of Seychelles' commercial (and informal) fisheries sector (if applicable). This is in particular relevant for efforts to increase the visibility and appreciation of post-harvest activities (e.g. processing and selling of fish), as well as the role of women in the overall fisheries value chain.

ID	Validation indicator	Scoring
B.1.7_1	The implementing country must publish information on the total quantity of fish and fish products produced, disaggregated by species and fish products.	Meaningful progress [2]
B.1.7_2	The implementing country must publish information on the total quantity of imports of fish and fish products, disaggregated by species and fish products, indicating the country of their origin.	Inadequate progress [1]
B.1.7_3	The implementing country must publish information on the total quantities of exports of fish and fish products, disaggregated by species and fish products, indicating the country of their destination.	Compliant [3]
B.1.7_4	The implementing country must publish information on the total number of people employed in commercial fisheries sectors, including the number of men and women working in specific sub-sectors.	Not collated
B.1.7_5	The implementing country must publish information on the total number of people employed in informal fisheries sectors, including the number of men and women working in specific sub-sectors.	Inadequate progress [1]
B.1.7_6	The implementing country must publish reports or studies on wages in the post-harvest sector, if available.	Not applicable
		Meaningful progress [Avg. 1.8]

Detailed remarks:

- ➡ **[B.1.7_1]** The total quantity of fish and fish products produced in Seychelles is published as part of the Production Indicator Q4 2020 Statistical Bulletin. The SFA Annual Reports typically delve into greater detail on fish and fish products produced, but the last annual

report produced dates back to 2018 . It is further noted that such information is not disaggregated by individual species as multiple species can be used to make the same product.

- ➞ **[B.1.7_2]** The total quantity of imports of fish and fish products for 2020 is published as part of the Merchandise Trade 2020 Q4 Statistical Bulletin of the NBS.⁴⁶ Additional information, such as weight as well as species or country of origin (as required by the FiTI Standard) is not published in these bulletins, but passed on to SFA, which incorporates the data into its annual report. As stated already, the publication of the annual reports has been delayed in recent years.

None of Seychelles' two FiTI Reports is addressing the lack of detailed information on fish and fish product imports. As this information is available to national authorities, but neither published online nor in a FiTI Report, this is seen as non-compliance with the FiTI Standard. However, as SFA typically publishes more detailed information on imports as part of its annual reports, there is no assumption of wilful withholding of information.

- ➞ **[B.1.7_3]** Information on exports of fish and fish products is collated by the Seychelles' government and made publicly accessible on a government website (through the Merchandise Trade Statistical Bulletins of the NBS). The published information is seen as complete and meets the disclosure requirements of the FiTI Standard (except for a lack of disaggregation according to species)⁴⁷.
- ➞ **[B.1.7_4]** During the entire validation timeframe, the National MSG was unable to determine whether information on the number of people employed in Seychelles' commercial fisheries sectors is available in the government's systems at all. Consequently, no such information is published, neither on a government website, nor in the FiTI Reports. A recommendation was made by the National MSG in the 2019 FiTI Report to publish annual employment information regarding Seychelles' commercial fisheries sector [ID: 2019-7_2; Priority: Medium; Due date: December 2023].⁴⁸

⁴⁶ <https://www.nbs.gov.sc/downloads/merchandise-trade-2020-q4/download>

⁴⁷ The National MSG stated that data for species groups could be available from records kept as part of the issuance of phytosanitary certificates (all exports) by the Fish Inspection and Quality Control Unit of the Seychelles Bureau of Standards, as well as catch certificates (exports above 20 kg) issued by SFA. However, this information is not published and was not reconciled as part of this FiTI Report

⁴⁸ A study was initiated in 2020 to undertake an employment and capacity needs assessment study for the fisheries sector in Seychelles. The release of the study has been delayed due to technical issues.

The FiTI International Secretariat assesses this requirement as ‘not collated’ under the assumption that such information is indeed not available to the government.

- ➡ **[B.1.7_5]** No employment information for the informal fisheries sector is collated by the Seychelles’ government. In the country’s 2019 FiTI Report, the National MSG stated its belief that Seychelles does not have a substantial informal fisheries sector. However, for the year 2020, the MoFBE was of the opinion that, though small, an informal sector does exist in Seychelles, particularly where it concerns fish mongers and the still unlicensed octopus’ fishery. Recommendation 2019-7_3 of the 2019 FiTI report encouraged the MoFBE to clearly state whether an informal fisheries sector exists in Seychelles. This responsibility has since been transferred to SFA. However, SFA had issued no official statement on the existence of an informal fishing sector before the publication of the 2020 FiTI Report.

[Best available information] The National MSG found no instances relating to employment statistics in Seychelles’ informal sector where information published by national authorities is clearly misleading, or could be improved by considering alternative sources of information, such as studies by non-governmental organisations, the private sector or academic institutions.

- ➡ **[B.1.7_6]** No information on wages in the post-harvest sector is collated by the government of Seychelles, and there are no reports or studies which have been published to date on this topic. This lack of information has not yet been addressed in a recommendation from the National MSG to Seychelles’ national authorities.

Fisheries Law Enforcement

The objective of this requirement is to enhance the public access to information around the scale and impact of non-compliance with national fisheries regulations, such as those associated ‘illegal, unreported and unregulated’ (IUU) fishing, as well as Seychelles’ strategies and activities to respond to these challenges, including their ability to enforce compliance with national laws and regulations and to administer effective and fair criminal justice.

ID	Validation indicator	Scoring
B.1.8_1	The implementing country must publish information on the national activities and strategies used for ensuring	Meaningful progress [2]

ID	Validation indicator	Scoring
	compliance of fishing vessels and the post-harvest sector with national legislation.	
B.1.8_2	The implementing country must publish information on the financial and human resources deployed by the government to ensure compliance with national legislation.	Meaningful progress [2]
B.1.8_3	The implementing country must publish information on the total numbers of inspections of fishing vessels at sea and in ports.	Compliant [3]
B.1.8_4	The implementing country must publish a record of convictions for major offences in the fisheries sector for the last five years, indicating the name of the company or vessel owner, the nature of the offence and the penalty imposed.	Inadequate progress [1]
		Meaningful progress [Avg. 2.0]

Detailed remarks:

- ➡ **[B.1.8_1]** No comprehensive report on national activities and strategies for ensuring compliance of fishing vessels and the post-harvest sector is provided by the national authorities⁴⁹, despite the fact that in recent years there has been an apparent increase of illegal fishing activities in Seychelles' waters. Only the *Fisheries Comprehensive Plan (2019)* as well as the *Fisheries Policy and Strategic Plan (2019)* – both including information regarding law enforcement in Seychelles' fisheries sector – were published prior to the validation timeframe.

As part of the 2019 FiTI reporting process, the *Seychelles National Plan of Action for Sharks (2016 – 2020)* as well as the *MCS Plan for the Mahé Plateau Demersal Fishery Management Plan (2020)* were both published on the SFA website.

However, the *National Plan of Action (NPOA) for Illegal, unreported and unregulated (IUU) fishing* is not published online. While no explanation has been given, there is no indication of wilfully withholding this plan.

Furthermore, publishing regular information on national strategies and activities applied to ensure compliance of fishing vessels and the post-harvest sector was a

⁴⁹ SFA is responsible for Monitoring, Control & Surveillance (MCS) as per its legal mandate under the SFA Establishment Act (1984) and the Seychelles Fisheries Act (2014). Yet, SFA did not publish an overall MCS strategy.

recommendation made by the National MSG in the 2019 FiTI Report [ID: 2019-8_1; Priority: Medium; Due date: December 2022].

- ➡ **[B.1.8_2]** The government of Seychelles does not provide a comprehensive report which collates efforts and spending from all of the concerned agencies involved in fisheries law enforcement (e.g. SFA, Fish Inspection and Quality Control Unit, Seychelles Coast Guard, Air Force, and Environmental Health Section).

Besides information on the total budget of SFA's MCS Division, no additional information was published in the two FiTI Reports as an interim measure. Given the complexity of collating information across ministries and agencies, no wilful withholding is assumed. Similar, the National MSG decided that compiling such information goes beyond the scope of the 2019 FiTI Report. This lack of information was addressed in a recommendation by the National MSG in the 2019 FiTI Report [ID: 2019-8_2; Priority: Medium; Due date: December 2023].

- ➡ **[B.1.8_3]** Information on the total numbers of inspections of fishing vessels at sea and in ports is available to the Seychelles' government (on a quarterly basis), with annual totals published as part of the SFA Annual Report.

As part of the 2020 FiTI reporting process, SFA made information on the quantity and types of inspections and patrols accessible to the Report Compiler, who summarised the information in the 2020 FiTI Report.

- ➡ **[B.1.8_4]** No record of convictions of major offences in the fishing sector for 2019 and 2020 has been published online on a government website, despite this information being available to national authorities.

The 2020 FiTI Report published a list of offenses (in Annex C). However, the information that was published does not meet the requirements of the FiTI Standard. Only in a limited number of cases, the name of the vessel involved is stated. No details are provided on the owner of the vessel involved in the incident or the date it occurred.

There is no indication of wilfully withholding information on other committed offenses in the fisheries sector.

Furthermore, publishing offences in the fisheries sector in a timely manner is a recommendation by the National MSG, made in its 2019 FiTI Report [ID: 2019-8_3; Priority: Medium; Due date: December 2022].

Labour Standards

The objective of this requirement is to enhance public access to information around national authorities' strategies and activities to ensure that high labour standards are applied to all parts of Seychelles' fisheries sector and that their efforts to enforcing these standards are well documented.

ID	Validation indicator	Scoring
B.1.9_1	The implementing country must publish a summary description of national laws on labour standards applicable for national and foreign workers employed in the fishing sector at sea and in the post-harvest fisheries sector.	<i>No progress [0]</i>
B.1.9_2	The implementing country must publish information on the public authorities responsible for monitoring and enforcing laws on labour standards.	<i>Meaningful progress [2]</i>
B.1.9_3	The implementing country must publish documents, including policy statements and evaluations, regarding a national strategy, if applicable, or related activities for enforcing the laws on labour standards in the fisheries sector, including total figures on the financial and human resources deployed by the government.	<i>Inadequate progress [1]</i>
B.1.9_4	The implementing country must publish information on the role and legal standing of anybody that has a governmental mandate to receive labour-related complaints from workers in the fishing sector and in the post-harvest sector.	<i>Meaningful progress [2]</i>
B.1.9_5	The implementing country must publish the total number of offences committed by employers in the fisheries sector that have been resolved by the authorities.	<i>Compliant [3]</i>
		<i>Meaningful progress</i> <i>[Avg. 1.6]</i>

Detailed remarks:

- ➡ [\[B.1.9_1\]](#) No summary description to facilitate public understanding of national laws on labour standards applicable for national and foreign workers employed in the fishing sector at sea and in the post-harvest has been compiled by the Seychelles' government.

Furthermore, this lack of information was not addressed in the two relevant FiTI Reports as an interim measure, despite the fact that a recommendation was made by the

National MSG to publish online such a summary description within this validation timeframe [ID: 2019-9_1; Priority: High; Due date: December 2021].

- ➔ **[B.1.9_2]** The Ministry of Employment and Social Affairs (MESA) is responsible for monitoring and enforcing laws on labour standards in the fisheries sector in Seychelles (as well as in other sectors). A statement to that effect is clearly published on the information page related to the Labour Relation Division of the MESA, but not yet on the website of MoFBE or SFA.
- ➔ **[B.1.9_3]** Various government documents exist that address specific areas of labour standards (e.g. the *Fisheries Comprehensive Plan*), which are accessible online on a government website. Furthermore, only partial and high-level information regarding the financial and human resources deployed to enforce the laws on labour standards in the fisheries sector is published in the FiTI Report.⁵⁰

This lack of information was not addressed in the two relevant FiTI Reports as an interim measure. Furthermore, no recommendation was made by the National MSG.

- ➔ **[B.1.9_4]** Complaints related to workers' grievances (including stemming from the fisheries sector) are channelled through the Labour Relation Division of the MESA. A statement to that effect is clearly published on the information page related to the Labour Relation Division of the MESA, but not yet on the website of MoFBE or SFA.
- ➔ **[B.1.9_5]** The number of offences committed by employers in the fisheries sector that have been resolved by the authorities is not published, neither by MESA, MoFBE or SFA. As part of the 2020 reporting process, MESA reported that no labour offences were recorded for the fisheries sector in this calendar year. This information was clearly stated in the 2020 FiTI Report.

Fisheries Subsidies

The objective of this requirement is to enhance public access to information around the extent and purpose of government subsidies offered to Seychelles' fisheries sector.

⁵⁰ For 2020, MESA reported that it has 15 inspectors enforcing labour standards across all sectors of the economy, including fisheries.

ID	Validation indicator	Scoring
B.1.10_1	The government must publish information on the type, values and recipients of government financial transfers or subsidies to the fisheries sector.	<i>Inadequate progress [1]</i>
B.1.10_2	The government must publish information on the average annual value of any fuel subsidies per unit of fuel in nominal and percentage terms.	<i>Meaningful progress [2]</i>
		<i><u>Meaningful progress</u></i> <i>[Avg. 1.5]</i>

Detailed remarks:

- ➡ [\[B.1.10_1\]](#) A comprehensive report on the value of government financial transfers and subsidies made to Seychelles' fisheries sector is not compiled by the Seychelles' government.

As part of the 2019 FiTI reporting process, the National MSG compiled information on different types of subsidies provided to the *small-scale fishing sector* and published this information in the FiTI Report. However, no information was publicly accessible on fisheries subsidies given to the *large-scale sector*. This relates to a lack of information regarding whether such subsidies are granted at all, which different subsidy categories exist, under which conditions they are granted, what is their total annual value, and who the main recipients are.

Both FiTI Reports clearly stated that this lack of information also challenges national legal obligations, for example, Seychelles' Access to Information Act. This Act legally mandates government organisations to publish detailed information on the design and execution of any subsidy programmes implemented with public funds. The National MSG issued a recommendation to the government to publish comprehensive information on subsidies given to large-scale and small-scale fisheries by December 2022 [ID: 2019-10_2; Priority: High].

A National MSG recommendation to publish a 2017 report that reviewed subsidies provided to the artisanal fisheries sector', commissioned by the SFA, was completed within the validation timeframe [ID: 2019-10_1; Priority: Medium; Due date: September 2021].

- ➞ **[B.1.10_2]** Information about the fuel incentive scheme (FIS) for the *small-scale fishing sector* is available online from the SFA website. Furthermore, based on information obtained from SFA as part of both FiTI reporting processes, the total values of fuel subsidies given to the small-scale fishing sector were reported in the 2019 and 2020 FiTI Reports.

[Efforts that go beyond FiTI requirements] In the 2020 FiTI Report, the National MSG also compiled information on ice subsidies given to the *small-scale fishing sector*, which included an intuitive table that compared prices for fishers with prices for the general public, as well as the 2020 prices and pre-COVID-19.

Official Development Assistance

The objective of this requirement is to increase public access to information regarding official development assistance (ODA), which can represent an important source of funds and support for a country's fisheries sector. In particular, it is relevant to provide information on the value, purpose and outcomes of public sector development projects.

ID	Validation indicator	Scoring
B.1.11_1	The government must publish information on public sector projects related to fisheries and marine conservation, funded by bilateral, multilateral and private donors, including information on the projects' value, purpose and outputs.	Meaningful progress [2]
B.1.11_2	The government must publish corresponding project evaluations, if applicable.	Meaningful progress [2]
		Meaningful progress [Avg. 2.0]

Detailed remarks:

- ➞ **[B.1.11_1]** At the beginning of the validation timeframe, no information on public sector development projects was published online by Seychelles' national authorities.

As part of both FiTI reporting processes, a list of *fisheries-related public sector development projects* has been provided in the FiTI Reports (Annex C).

Regarding *conservation-related public sector development projects*, there is also no comprehensive overview provided by the government of Seychelles, despite the fact that

several of such projects are currently being implemented in Seychelles (e.g. related to the Seychelles Marine Spatial Planning process). Information obtained during the 2020 FiTI reporting process from the Public Budget Management Section of the Ministry of Finance, Economic Planning and Trade was listed in Annex C of the 2020 FiTI Report. However, the National MSG stated their uncertainty over whether the list covers all relevant public sector projects funded by bilateral, multilateral and private donors.⁵¹

In order to improve the public accessibility and completeness of information, the National MSG recommended that MoFBE and the SFA should together publish an up-to-date list of fisheries-related public sector projects, funded by bilateral, multilateral and private donors [2019 FiTI Report, ID: 2019-11_1; Priority: High; Due date December 2021]. However, this recommendation has not been addressed by the government yet.

- ➔ **[B.1.11_2]** Information on project evaluations of public sector development projects is not published online by Seychelles' national authorities. As part of the 2020 FiTI reporting process, a list of *fisheries-related public sector development projects* has been provided in the FiTI Report (Annex C), including information on project evaluations. It remains unclear whether project evaluations exist for the *conservation-related public sector development projects*.

Beneficial Ownership

The objective of this requirement is to enhance public access to information around the existing legal and procedural framework of who ultimately owns and controls the companies operating in Seychelles' fisheries sector.

ID	Validation indicator	Scoring
B.1.12_1	The government must publish the legal basis for beneficial ownership transparency in the country.	Compliant [3]
B.1.12_2	The government must publish the country's legal definition of beneficial ownership.	Compliant [3]
B.1.12_3	The government must publish information on the availability of a public register of beneficial owners.	Compliant [3]

⁵¹ The National MSG determined that financial contributions received from the European Union under the Sustainable Fisheries Partnership Agreement with Seychelles for the support and implementation of Seychelles' sectoral fisheries and maritime policy relates to fishing activities in fishing areas within Seychelles' EEZ and should therefore not be considered as ODA.

ID	Validation indicator	Scoring
B.1.12_4	The government must publish the rules and procedures for incorporating beneficial ownership in filings by companies to corporate regulators, stock exchanges or agencies regulating the access to fisheries.	Compliant [3]
B.1.12_5	The government must publish the current status and discussions around beneficial ownership transparency in fisheries.	Compliant [3]
		<u>Compliant</u> [Avg. 3.0]

Detailed remarks:

- ➔ **[B.1.12_1]** The Beneficial Ownership Act (2020) as well as the Beneficial Ownership Regulations (2020) are the legal basis for beneficial ownership transparency in the country. These documents are published online by the Seychelles Financial Services Authority.⁵²
- ➔ **[B.1.12_2]** The definition of a beneficial owner is part of the Beneficial Ownership Act (2020).
- ➔ **[B.1.12_3]** A central register of beneficial owners is currently being established in Seychelles (but was not completed by the end of 2021). This registry will not be made available to the general public.⁵³ Reference to the availability and accessibility of this registry are made in both FiTI Reports.
- ➔ **[B.1.12_4]** The general rules and procedures regarding beneficial ownership are published by the Seychelles Financial Services Authority, e.g. in the Beneficial Ownership Guidelines (Version 2020). However, the National MSG determined that beneficial ownership transparency in fisheries has been neglected in Seychelles, despite international policy debates and national obligations.⁵⁴ This lack of information regarding

⁵² <https://fsaseychelles.sc/aml-cft/beneficial-ownership>

⁵³ The FiTI Standard does not request that such a registry is available or made publicly accessible, and instead just requires governments to provide information about the availability of such a registry.

⁵⁴ Although the BO Act is not industry-specific, it captures all legal persons or arrangements registered in Seychelles, both by the Financial Services Authority and the Registrar. As such, if a fishing vessel is owned by a legal person or arrangement registered in Seychelles, that legal person/arrangement is subjected to the BO Act and must maintain,

beneficial ownership in fisheries was clearly stated in both FiTI Reports. It is highlighted that although the BO Act is not industry-specific, it captures all legal persons or arrangements registered in Seychelles, both by the Financial Services Authority and the Registrar. As such, if a fishing vessel is owned by a legal person or arrangement registered in Seychelles, that legal person/arrangement is subjected to the BO Act and must maintain, through their resident agents, a Register of Beneficial Owners, and populate their beneficial ownership information in the central database.

The 2020 FiTI Report also states that the Fisheries Act requires SFA to collect beneficial owner information upon the registering of fishing vessels. However, this is rarely done. SFA states that even though the Fisheries Act compels them to record beneficial ownership information upon the registry of fishing vessels, the Act does not make it an offence for vessel operators not to divulge the name of beneficial owners and does not impose any penalties for not reporting such information.

The 2020 FiTI Report also emphasises that very few of the Seychelles-flagged vessels in the *IOTC Record of Currently Authorised Vessels* have actual beneficial owner information listed.

- ➔ **[B.1.12_5]** As stated in the previous item, both FiTI Reports include information on the current status and discussions around beneficial ownership transparency in fisheries. According to the 2020 FiTI Report, the MoFBE informed the National MSG that it has started to work on policy/implementation procedures for addressing beneficial ownership transparency in fisheries. However, there is, as of yet, no clear timeline from the national authorities on when such a policy will be applied and/or vessel owners are required to provide beneficial ownership information.

through their resident agents, a Register of Beneficial Owner, and populate their beneficial ownership information in the central database.

4) Assessment of individual ‘procedural requirements for FiTI Reports’

The assessment of the procedural requirements of Seychelles’ FiTI Reports consists of **four validation elements**. The assessment looks at both of Seychelles’ FiTI Reports that fall within the validation timeframe (2019, 2020).

In accordance with FiTI Guidance Note #3 (‘Validating countries’), certain procedural requirements that the FiTI Standard lists under section B.2 have already been assessed in the previous section. Therefore, only the remaining relevant aspects are evaluated.

Reporting Requirements

ID	Validation indicator	Scoring
B.2.1_1	The National MSG must produce a FiTI Report annually.	Compliant [3]
B.2.1_2	For each transparency requirement, FiTI Reports must provide a succinct summary of the main findings according to the FiTI Report’s reporting period (B.2.2).	Compliant [3]
B.2.1_3	For each transparency requirement, FiTI Reports must include a reference on where detailed information can be found in the public domain, if applicable.	Compliant [3]
B.2.1_4	For each transparency requirement, FiTI Reports must provide an explanation of significant deviations from previous reporting periods, if applicable.	Compliant [3]
B.2.1_5	For each transparency requirement, FiTI Reports must include recommendations for improvements on how to strengthen the availability of accessible, complete and up-to-date information in the public domain, if applicable.	Compliant [3]
		<u>Compliant</u> [Avg. 3.0]

Detailed remarks:

- ➡ **[B.2.1_1]** Seychelles has provided two FiTI Reports within the validation timeframe, covering information for calendar year 2019 and for calendar year 2020. No gaps exist between these two reports.

- ➔ **[B.2.1_2]** Both FiTI Reports clearly state in their summary sections whether information is available to the government, whether the information published on a government website is freely accessible, and whether the information is seen as complete by the National MSG. The National MSG's assessment for each of those questions are shown via Harvey balls, facilitating an intuitive understanding of the current situation.

Furthermore, in the detailed section of the two FiTI Reports, comprehensive information tables are shown for each of the relevant requirements of the FiTI Standard, indicating with an even higher level of detail whether information is available, accessible and complete.

- ➔ **[B.2.1_3]** Both FiTI Reports include references (i.e. hyperlinks, typically as footnotes) to where information can be found online on government websites.

- ➔ **[B.2.1_4]** The 2020 FiTI Report provides explanations for significant deviations from the previous reporting period (i.e. 2019 FiTI Report). Such explanations cover two aspects:

- 1) Deviations in the underlying information (e.g. number of vessels) are clearly shown in the 2020 FiTI Report by comparing the current information to information from the previous calendar year. This allows for a simple comparison between the two reporting periods (i.e. 2019 and 2020).
- 2) Deviations in the transparency performance are explained in the 2020 FiTI Report (e.g. information that was made available only in the 2019 FiTI Report has now been published online on a government website – such as the summary descriptions of tenure arrangements).

- ➔ **[B.2.1_5]** Both FiTI Reports include recommendations from the National MSG for how the Seychelles' government can strengthen the availability of accessible, complete and up-to-date information in the public domain. More information on the scope, level of detail as well as implementation status is described in chapter 6 of this document: 'Appraisal of progressive improvements'.

Reporting Deadlines and Periods

ID	Validation indicator	Scoring
B.2.2_1	<i>[Only for Seychelles' 2019 FiTI Report]</i> The country's 1 st FiTI Report must be published within the subsequent year of becoming a FiTI Candidate country.	Compliant [3]
B.2.2_2	<i>[Only for Seychelles' 2019 FiTI Report]</i> The country's 1 st FiTI Report must contain information on transparency requirements 1 – 6, set forth in section B.1 of the FiTI Standard.	Compliant [3]
B.2.2_3	<i>[Only for Seychelles' 2019 FiTI Report]</i> The country's 1 st FiTI Report must contain information from the complete calendar year when the country became a FiTI Candidate country.	Compliant [3]
B.2.2_4	Following the 1 st FiTI Report, subsequent FiTI Reports must be published on an annual basis, comprising information from the complete calendar year preceding the year addressed in the last FiTI Report.	Compliant [3]
B.2.2_5	Every second FiTI Report must include information on transparency requirements 7 – 12 set forth in section B.1 of the FiTI Standard, and this information must be disaggregated by calendar years.	Compliant [3]
		<u>Compliant</u> [Avg. 3.0]

Detailed remarks:

- ➔ **[B.2.2_1]** Seychelles became a FiTI Candidate country in April 2020. The country's first FiTI Report was published in the subsequent year, i.e. on 16 April 2021.
- ➔ **[B.2.2_2]** Both FiTI Reports (2019 and 2020) cover all 12 transparency requirements of the FiTI Standard, and not just the mandatory first six requirements.
[Efforts that exceed the requirements of the FiTI Standard] Addressing all 12 transparency requirements in each report, and not just in every other report, is an effort exceeding FiTI requirements, and is therefore documented as part of this assessment.

- ➔ **[B.2.2_3]** In accordance with the FiTI Standard, a country's first FiTI Report must contain information from the complete calendar year in which it became a FiTI Candidate country (i.e. 2020 in Seychelles' case). However, Seychelles' first FiTI Report covered information from calendar year 2019 and therefore, from a formal point of view, Seychelles is not compliant with this requirement. However, given that certain information relevant for the FiTI Report (e.g. catch data from distant (tuna) fishing fleets) is often received by Seychelles' national authorities with a delay of up to 12 months, certain information relevant for calendar year 2020 would have only been available to the government (latest) towards the end of 2021. If the National MSG had chosen to comply with this requirement and publish its first report with information from calendar year 2020, the report would only have been published at the end of 2021 and thus, at least 18 months after the Seychelles obtained FiTI Candidate Country status. This would have likely resulted in a loss of momentum for FiTI within the country. *As a FiTI validation needs to take into account whether a country acts in accordance with the spirit of the FiTI – as well as evaluating how compliant it is against the requirements of the initiative – the fact that the National MSG published Seychelles' first (2019) FiTI Report as early as possible, instead of waiting to fulfil a formal requirement, is seen as positive and not as a violation of the FiTI Standard.* Furthermore, Seychelles went on to publish its second (2020) FiTI Report in the same year (i.e. 15 December 2021) – again meeting the reporting deadlines of the FiTI Standard –, underscoring the National MSG's commitment to enhancing the public availability of fisheries information.
- ➔ **[B.2.2_4]** Seychelles' 2020 FiTI Report was published in the same year as the country's 2019 FiTI Report, and comprised of information from the complete calendar year (i.e. 2020) preceding the year addressed in the 2019 FiTI Report.
- ➔ **[B.2.2_5]** Seychelles' 2020 FiTI Report covered all 12 transparency requirements of the FiTI Standard, as shown above [B.2.2_1]. As the 2019 FiTI Report also covered all 12 requirements, no separate disaggregation of annual information is necessary.

Reporting Process

ID	Validation indicator	Scoring
B.2.3_1	The country's FiTI Reports must be compiled by an independent, credible, trustworthy and technically competent Report Compiler.	Compliant [3]

ID	Validation indicator	Scoring
B.2.3_2	The engagement of the country's Report Compilers must be based on Terms of Reference, which must include minimum procedures for FiTI Reports, as endorsed by the FiTI International Board. ⁵⁵	<i>Compliant [3]</i>
B.2.3_3	The appointment of the country's Report Compiler must be endorsed by the National MSG.	<i>Meaningful progress [2]</i>
B.2.3_4	The National MSG and the Report Compiler must work jointly to ensure that the entire FiTI reporting process is perceived as open and inclusive.	<i>Compliant [3]</i>
B.2.3_5	The Report Compiler must consult with relevant national and international organisations to ensure that the assessment on the transparency requirements is perceived as credible and trustworthy, and that all appropriate sources of information are considered.	<i>Compliant [3]</i>
B.2.3_6	The Report Compiler must seek to resolve the discrepancies between published government information and information from other stakeholders, if applicable. ⁵⁶	<i>Meaningful progress [2]</i>
B.2.3_7	The Report Compiler must consolidate the findings in a preliminary FiTI Report and submit it to the National MSG for review.	<i>Compliant [3]</i>
B.2.3_8	The National MSG must review the preliminary findings of the Report Compiler and provide comments. ⁵⁷	<i>Meaningful progress [2]</i>
B.2.3_9	The National MSG must formally approve the FiTI Reports and publish them afterwards.	<i>Meaningful progress [2]</i>
B.2.3_10	<i>[Only for Seychelles' 2019 FiTI Report]</i> The National MSG must consult with the FiTI International Secretariat prior to publishing its first FiTI Report to review completeness against the FiTI reporting requirements.	<i>Compliant [3]</i>

⁵⁵ The FiTI Standard states that ToRs may be adapted to include additional transparency requirements beyond those established in the FiTI Standard, if this is agreed upon by the National MSG.

⁵⁶ This also includes information that is published on government websites vs. information that is provided in a FiTI Report.

⁵⁷ The FiTI Standard encourages the National MSG to consult with others outside of the National MSG in undertaking this review. However, this is not a mandatory requirement and therefore, falls outside of the scope of the validation.

ID	Validation indicator	Scoring
		<u>Compliant</u> [Avg. 2.6]

Detailed remarks:

- ➞ **[B.2.3_1]** Both FiTI Reports were prepared by Dr Jude Bijoux (PhD), acting as the country's Report Compiler. Dr Bijoux is based in the Seychelles and is a marine scientist and consultant with wide experience in the field of fisheries management, marine research, climate change related policy and strategy formulation . Dr Bijoux was not and is not part of the National MSG.
- ➞ **[B.2.3_2]** Both FiTI Reports were financed by an external party, i.e. the Third South West Indian Ocean Fisheries Governance and Shared Growth Project (SWIOFish3) through a Global Environment Facility grant (TF-A5293) administered by the International Bank for Reconstruction and Development (IBRD). The engagement of the country's Report Compiler was therefore conducted through this party's own procurement processes. Nevertheless, the engagement was based on Terms of Reference that comply with the minimum procedures for FiTI Reports, as outlined in FiTI Guidance Note #2.
- ➞ **[B.2.3_3]** The appointment of Dr Bijoux as Seychelles' 2019 and 2020 FiTI Report Compiler was endorsed during meetings of the National MSG. However, this endorsement has not been documented in the meeting minutes of the National MSG.
- ➞ **[B.2.3_4]** No evidence was found that the National MSG and the Report Compiler failed to work together jointly to ensure the entire FiTI reporting process (for both FiTI Reports) was open and inclusive.
- ➞ **[B.2.3_5]** The Report Compiler consulted with several organisations (primarily Seychelles-based) to ensure that the FiTI Reports are seen as credible and trustworthy, and that all appropriate sources of information are considered. This included consultations with the Seychelles Fishing Authority (SFA), the Department of Fisheries within the Ministry of Fisheries and Blue Economy, the Financial Intelligence Unit, the Department of Information Communications Technology, the Department of Employment, and the Department of Foreign Affairs. Detailed information regarding the

consultations conducted during the preparation of the FiTI Reports are listed as annexes in both reports.

- ➔ **[B.2.3_6]** Several discrepancies were found by the Report Compiler, in particular during the preparation of Seychelles' 2019 FiTI Report. For example, one payment for a fishing licence had two receipts with different numbers. Similarly, discrepancies were noted between Seychelles' large-scale vessel registry (2020) and the Semester 1 (2020) Fisheries Statistical Report in terms of numbers of industrial fishing vessels fishing in Seychelles' waters in 2020. Both of these discrepancies have been resolved. However, other discrepancies remain unresolved. For example, a definitive explanation is yet to be given behind differences in the number of semi-industrial vessels licenced in 2020 between the Semester 1 Fisheries Statistical Report and the list published on the SFA website.
- ➔ **[B.2.3_7]** For both reporting periods, the Report Compiler consolidate his findings in several preliminary FiTI Reports and submit them to the National MSG for review.
- ➔ **[B.2.3_8]** For both reporting periods, members of the National MSG reviewed the preliminary findings of the Report Compiler and provided comments. It is perceived that more members of the National MSG were involved in the review of the country's first (2019) FiTI Report, then in the second (2020) FiTI Report.
- ➔ **[B.2.3_9]** Both FiTI Reports were approved by the National MSG during their meetings. However, these approvals have not been formally documented in the meeting minutes of the National.
- ➔ **[B.2.3_10]** For Seychelles' first (2019) FiTI Report, the Report Compiler as well as the National MSG (in particular the country's FiTI National Lead) consulted extensively with the FiTI International Secretariat prior to publishing the report. This was necessary, as Seychelles' 2019 FiTI Report was the first report to ever be published globally. Thus, the collaboration included not only regular reviews of the completeness against the FiTI reporting requirements, but also the report structure and layout.

Report Dissemination and Public Debate

ID	Validation indicator	Scoring
B.2.4_1	FiTI Reports must be comprehensible and written in a clear and accessible style.	<i>Compliant [3]</i>
B.2.4_2	FiTI Reports must be widely distributed among key audiences, including government, parliamentarians, companies, civil society groups, academia, the media, and international stakeholders.	<i>Compliant [3]</i>
B.2.4_3	The National MSG must ensure that the main findings of the FiTI Report contribute to public debates on how the fisheries sector is managed, enabling relevant stakeholders as well as citizens of FiTI implementing countries to demand reforms towards better governance of their marine fisheries. ⁵⁸	<i>Meaningful progress [2]</i>
B.2.4_4	FiTI Reports must be published online under an open license.	<i>Inadequate progress [1]</i>
B.2.4_5	The National MSG must make users aware that information can be reused without prior consent.	<i>Inadequate progress [1]</i>
		<i>Meaningful progress [Avg. 2.0]</i>

Detailed remarks:

- ➞ **[B.2.4_1]** Both FiTI Reports are seen as being written in clear, non-technical language and due to the usage of various visualisation elements (e.g. charts, Harvey balls, icons) in a very accessible style. Stakeholder feedback obtained on an anecdotal level (in particular after the publication of Seychelles' 2019 FiTI Report) supports this assessment. As the length of the 2019 FiTI Report exceed 100 pages, the National MSG decided to split the 2020 FiTI Report into a summary section (targeted for the wider general public) and a detailed section (targeted at fisheries stakeholders). Furthermore, a reduction in the overall length of the 2019 to the 2020 FiTI Report can be seen, as for the 2019 report, information was largely absent from government websites and had to be published as part of the report. Such information is now available online.

⁵⁸ The FiTI Standard encourages National MSGs to contribute the lessons learnt and recommendations from FiTI Reports to policy dialogues and broader conversations about national reform efforts. However, this is not a mandatory requirement and therefore, falls outside of the scope of the validation.

[Efforts that exceed the requirements of the FiTI Standard] The FiTI Standard encourages FiTI Reports to be translated into appropriate languages. The official language of Seychelles is English, which is the language used in both FiTI Reports. However, several supporting documents, such as a summary sheet for the 2019 FiTI Report, have also been translated into Creole.

- ➡ **[B.2.4_2]** Both FiTI Reports have been widely distributed among key stakeholders. Notable examples include:
- Both FiTI Reports were featured strongly among *Seychelles' media outlets*, including newspaper articles as well as TV and radio interviews.⁵⁹
 - The National MSG produced a *2-page overview flyer* for the 2019 FiTI Report, summarising the main findings of the reporting period to facilitate public understanding.
 - The Ministry of Foreign Affairs and Tourism Otherwise sent out an official note verbale to fellow islands in the *Alliance of Small Island States (AOSIS)* notifying them of the report and the importance of transparency in fisheries for tourism-dependent Small-Island Development States.
 - In September 2021, the FiTI National Lead, the SFA's FiTI Focal point as well as the FiTI International Secretariat conducted an awareness raising *meeting with several members of Seychelles' parliament*, covering key areas of enhanced transparency of Seychelles' fisheries, including government earnings from fisheries resources and the industry's contribution to national food security.⁶⁰
 - Members of Seychelles' MSG have been planning a so-called '*Tour des Seychelles*', with the intention to present the FiTI Reports to various national fisheries stakeholders and encourage them to debate and engage with its contents. Unfortunately, due to the COVID-19-related situation in the country, such events have not been conducted yet.

In addition, the dissemination of the FiTI Reports was supported by the FiTI International Secretariat, through a global email campaign as well as regular contributions via the Secretariat's social media channels (e.g. Twitter, LinkedIn).

⁵⁹ The FiTI International Secretariat compiled a report on media coverage and stakeholder reactions in the three months following the release of Seychelles' 2019 FiTI Report.

⁶⁰ <https://www.nationalassembly.sc/media/news/2021-09/members-learn-more-about-fisheries-transparency-initiative>

[Efforts that exceed the requirements of the FiTI Standard] The FiTI Standard encourages outreach events, whether organised by government, civil society or business, to spread awareness on and facilitate dialogue around the FiTI across the entire country. Seychelles' 2019 FiTI Report was launched during a high-level forum on 16 April 2021. The launch ceremony was attended by President Wavel Ramkalawan, Minister for Fisheries and Blue Economy, Jean-François Ferrari, as well as around 50 members of the government, diplomatic corps and national stakeholders within the fisheries sector. Around 30 people also followed the event live on YouTube. During the event, several congratulatory messages were shown, inter alia from Peter Thomson, United Nations Secretary-General's Special Envoy for the Ocean, Dr Nicholas Hardman-Mountford, the Commonwealth Secretariat's Head of Oceans and Natural Resources, and Audun Lem, Deputy-Director of the Fisheries Division of the Food and Agriculture Organization of the United Nations (FAO).⁶¹

Furthermore, in his opening keynote speech Minister Ferrari issued a strong statement towards Seychelles' leadership in global transparency efforts:



- ➔ **[B.2.4_3]** The assessment of this indicator is mainly based on anecdotal evidence. For example, in October 2021 Seychelles published its first ever co-management plan specifically targeting the artisanal fishery.⁶² By providing information to the general public through the FiTI, such as regarding the health of Seychelles' fish stocks, the FiTI Reports are contributing to an environment that is beginning to become more appreciative and understanding of the need for such restrictions and regulations.

However, there is currently no formalised approach to how the main findings of the FiTI Report contribute to public debates on how the fisheries sector is managed, nor how this information can feed into public policy making.

⁶¹ <https://www.nation.sc/articles/8618/seychelles-officially-launches-first-ever-fiti-report-on-marine-fisheries-policy>
<https://www.mfa.gov.sc/events/3/launch-of-seychelles-1st-report-to-the-fisheries-transparency-initiative-fiti>

⁶² The Mahé Plateau Trap and Line fishery Co-Management Plan

The importance of such a more formalised approach has also been highlighted in Seychelles' first 'Independent Reporting Mechanism (IRM): Seychelles Design Report 2019–2021' of the Open Government Partnership (OGP)⁶³. The report states that *'The effectiveness of the [FiTI] commitment however hinges largely on the government's ability to utilise the FiTI report in generating public discourse on fisheries transparency. Previously, there has been minimal outreach and public participation in the fisheries sector outside of annual celebrations of World Food Day or during the development of the Marine spatial plan. There are now plans in place to hold workshops with fishing communities and the fish processing sector to unpack the content of the FiTI report. This likely follows from stakeholders' fears around the potential low public demand for information once the FiTI report is published, given what they describe as a culture of public lethargy concerning demanding or interrogating information within the sector.'*

- ➡ **[B.2.4_4]** Both FiTI Reports have been published online (on the website of the SFA) ⁶⁴. However, there is no evidence that the reports have been published under an open and unrestricted license, such as those developed by Creative Commons. Given that (in Seychelles' case) the FiTI Reports are currently used to display a significant amount of information which is not available on government websites, such licences should be published and linked to open data to ensure users can easily find and understand the conditions of data access and reuse.
- ➡ **[B.2.4_5]** The National MSG has not made users explicitly aware that information published within both FiTI Reports can be reused. Furthermore, the National MSG has not made the relevant sections of the FiTI Reports' annexes available online in an open data format (e.g. csv, xml).

⁶³ The Open Government Partnership (OGP) is a global partnership that brings together government reformers and civil society leaders to create action plans that make governments more inclusive, responsive, and accountable. Seychelles joined OGP in 2018 and submitted its first National OGP Action Plan (2019-2021) in December 2019. Through the Independent Reporting Mechanism (IRM), the OGP monitors all action plans to ensure governments follow through on commitments.

The Seychelles first IRM report can be accessed here: <https://www.opengovpartnership.org/documents/seychelles-design-report-2019-2021/>

⁶⁴ 2019 FiTI Report: <https://www.sfa.sc/index.php/e-library/fisheries-report?task=download.send&id=137&catid=33&m=0>

2020 FiTI Report (Summary Section): <https://www.sfa.sc/index.php/fisheries-report-other-document?task=download.send&id=166&catid=33&m=0>

2020 FiTI Report (Detailed Section): <https://www.sfa.sc/index.php/fisheries-report-other-document?task=download.send&id=165&catid=33&m=0>

5) Assessment of individual requirements for the ‘National Implementation Framework’

The assessment of Seychelles’ National Implementation Framework, as part of this Baseline Assessment Report, consists of **five validation elements**, in accordance with section B.3 of the FiTI Standard.

Furthermore, in accordance with the FiTI Principles 3 and 5, and as set out in requirements B.3.1 and B.3.3, the meaningful participation of representatives from each of FiTI’s three stakeholder groups is fundamental in achieving the objectives of the FiTI. Therefore, this section also assesses any potential breaches of the **principles and spirit** of the initiative, i.e. ad-hoc restrictions on the participation of a FiTI stakeholder group or its representatives.

Enabling Environment for Stakeholder Participation

ID	Validation indicator	Scoring
B.3.1_1	The government must maintain an enabling environment for business and civil society participation as specified in requirement A.2.	<i>Compliant [3]</i>
		<i>Compliant</i> <i>[Avg. 3.0]</i>

Detailed remarks:

- ➞ **[B.3.1_1]** In general, the Seychelles is seen as a country providing an environment that allows stakeholders to engage openly in public debates and express their opinions. Freedom of expression is guaranteed under the Seychelles’ Constitution.⁶⁵

According to Seychelles’ first Independent Reporting Mechanism (IRM): Seychelles Design Report 2019–2021 of the Open Government Partnership (OGP)⁶⁶, ‘Seychelles

⁶⁵ <https://www.wipo.int/edocs/lexdocs/laws/en/sc/sc001en.pdf>

⁶⁶ The Open Government Partnership (OGP) is a global partnership that brings together government reformers and civil society leaders to create action plans that make governments more inclusive, responsive, and accountable. Seychelles joined OGP in 2018 and submitted its first National OGP Action Plan (2019-2021) in December 2019. Through the Independent Reporting Mechanism (IRM), the OGP monitors all action plans to ensure governments follow through on commitments. The Seychelles first IRM report can be accessed here: <https://www.opengovpartnership.org/documents/seychelles-design-report-2019-2021/>

benefits from emerging access to information and budget transparency processes. Additionally, the country is experiencing an upward trend in civil liberties and civic participation.’ However, the OGP-IRM report also states that ‘*Seychelles has room for growth when it comes to public sector responsiveness, transparency, and accountability. In particular, civil society is dependent on government funding, and there are limited opportunities for citizens to participate in decision-making.*’

Seychelles has enacted an Access to Information Act in 2018, a process that took more than three years to complete. Civil society made various contributions to the development of the Act, with reference to the African Commission on Human and Peoples’ Rights’ draft model law. Further commitments to ensuring improved access to information and public participation in the decision-making process have been made in the Seychelles National Development Strategy of 2019–2023.

Seychelles’ enabling environment is also recognised by several international initiatives, such as:

- The *Global Right to Information (RTI)* rating ranks Seychelles 29 out of 134. The assessment showed that Seychelles’ Access to Information Act allows for broad scope in accessing information and puts in place measures to ensure ease when requesting information;⁶⁷
- *Freedom of the press* in Seychelles, as determined by the international non-governmental organisation Freedom House (latest for 2021) is seen as ‘free’, an improvement from the country’s 2017 score of only ‘partly free’.⁶⁸
- Seychelles also continues to strengthen its overall governance performance. For example, Seychelles ranked number 3 in ‘Overall Governance’ in the *Ibrahim Index of African Governance (IIAG)* – out of 54 – and a detailed score of 75.3 of 100 for the category ‘Participation, rights and inclusion’.⁶⁹

With regards to an enabling environment for stakeholder participation specifically in the FiTI, it is seen that the government is demonstrating a commitment towards relevant laws, regulations, and administrative rules as well as actual practice in implementation of the FiTI. This entails relevant stakeholders, including but not limited to members of the National Multi-Stakeholder Group, being able to:

- engage in public debate related to the FiTI;

⁶⁷ <https://www.rti-rating.org/country-data/Seychelles/>

⁶⁸ <https://freedomhouse.org/country/seychelles/freedom-world/2021>

⁶⁹ <https://iiag.online/data.html?meas=GOVERNANCE&loc=SC&view=overview>

- express their opinions about the FiTI without restraint, coercion or reprisal;
- operate freely in relation to the FiTI;
- communicate and cooperate with each other regarding the FiTI;
- engage fully, actively and effectively in the design, implementation, monitoring and evaluation of the FiTI; and
- speak freely on fisheries governance issues.

Anecdotal evidence shows that non-governmental fisheries stakeholders are speaking critically to the government and/or fishing companies regarding matters that concern them. This includes, for example, public critique about a previous lack of involvement of non-governmental stakeholders in the negotiation of foreign fishing access agreements, or general concerns around foreign fishing in Seychelles waters' (e.g. under the agreement with the European Union).

This assessment found no legal, regulatory or administrative obstacles that prevent or limit the involvement of business and/or civil society stakeholders in Seychelles' FiTI implementation process. Similarly, regarding the actual practice of stakeholder participation, this assessment found no evidence illustrating civil society or business representatives were:

- ➡ restricted from participating in the FiTI National MSG or from providing input for key documents of the FiTI implementation process, such as the National MSG's workplan or FiTI Reports;⁷⁰
- ➡ hindered from engaging in public debate, or refrained from expressing their opinions due to fear of reprisal;
- ➡ discouraged from communicating information and opinions related to the FiTI implementation to the media, or the media from publishing such information and opinions due to threats of administrative measures, sanctions, or bars on publication;
- ➡ restricted from carrying out activities relating to the FiTI due to registration requirements or related fees;
- ➡ unable to consult, engage with, share with or seek information from local communities regarding issues related to the FiTI implementation process in Seychelles or the National MSG's work;

⁷⁰ In 2019, a Cabinet paper on the enlargement of the FiTI MSG from the initial 7 to 12 members was approved, based on the demands of the civil society stakeholder group.

- ➡ unable to cooperate with colleagues in civil society, business and government, either within or outside Seychelles in relation to discussions about National MSG representation or the FiTI process;

However, it must be noted that civil society and business involvement in Seychelles' FiTI implementation process is currently limited to the representatives of the National MSG (see below). Outside of this group, little attention is given to Seychelles' efforts to enhance transparency in fisheries management through the FiTI. This is not seen as the result of any legal or practical restrictions on engagement, but rather due to a lack of engagement at all. For example, the International Secretariat is not aware of any constituency side meetings that were held by members of the National MSG. Also, there is very little communication or advocacy from civil society organisations (not part of the National MSG) on issues related to the FiTI.

It is currently unclear whether the lack of involvement, in particular from civil society organisations, is mainly due to a lack of interest in fisheries management, or due to a lack of adequate capacity and support to participate meaningfully in the FiTI (e.g. sufficient information, resources, time). Furthermore, it is generally known that the civil society sector in Seychelles is still in its infancy and there are few groups with the necessary leadership and focus to actually perform oversight functions, raise issues of national interest in the public sphere or hold decision makers accountable. However, future validations should examine this aspect further, including the role of the FiTI National MSG to set positive examples.

Governance and Support

ID	Validation indicator	Scoring
B.3.2_1	The government must maintain a FiTI Lead Ministry and a FiTI National Lead as specified in requirement A.3.	<i>Compliant [3]</i>
B.3.2_2	Changes to the FiTI Lead Ministry or the FiTI National Lead must be made public, if applicable.	<i>Not applicable</i>
B.3.2_3	The National MSG must maintain a properly authorised and resourced FiTI National Secretariat as specified in requirement A.5.	<i>Meaningful progress [2]</i>
		<u><i>Compliant</i></u> <i>[Avg. 2.5]</i>

Detailed remarks:

- ➔ **[B.3.2_1]** Throughout the entire timeframe of this validation, the FiTI Lead Ministry (i.e. Department of Blue Economy (DoBE⁷¹) as well as the FiTI National Lead (i.e. Philippe Michaud) remained the same. This stability is seen as an important factor in the country's successful implementation over the last two years.
- ➔ **[B.3.2_3]** The official function of the FiTI National Secretariat has been assigned to the Seychelles Fishing Authority (SFA). However, as stated in the country's Candidate application document, due to managerial changes at SFA, and in order to ensure an efficient and time-sensitive implementation process, the role of the National Secretariat has initially been assumed by the DoBE within the MoFBE. By end of December 2021, there is still no clear assignment of the FiTI National Secretariat. Most of the Secretariat's work is still carried out by operational personnel within the DoBE, without clear assignments or responsibilities. Furthermore, while SFA recently appointed a senior representative as the organisation's FiTI focal point, it is unclear whether this means that the SFA will now assume its original responsibility of hosting Seychelles' FiTI National Secretariat.

It is therefore recommended that the organisational and personnel responsibility for running the FiTI National Secretariat is clearly defined between the DoBE and the SFA.

The FiTI Standard also encourages National MSGs to explore operational synergies with similar secretariats or organisations supporting other multi-stakeholder initiatives already established in the country. In the case of the Seychelles, the country is also a member of the Extractive Industries Transparency Initiative (EITI). The operational personnel within the DoBE currently responsible for the FiTI is also Seychelles' National EITI Coordinator. However, it appears that potential synergy effects in overlapping aspects (e.g. beneficial ownership) are not fully explored.

Multi-Stakeholder Oversight

ID	Validation indicator	Scoring
B.3.3_1	The government must maintain a National MSG as specified in requirement A.4.	<i>Compliant [3]</i>

⁷¹ The change of the Department of the Blue Economy's allocation from the Office of the Vice-President to the Ministry of Fisheries and Blue Economy did not result in any noticeable delay or negative impact on the FiTI implementation process.

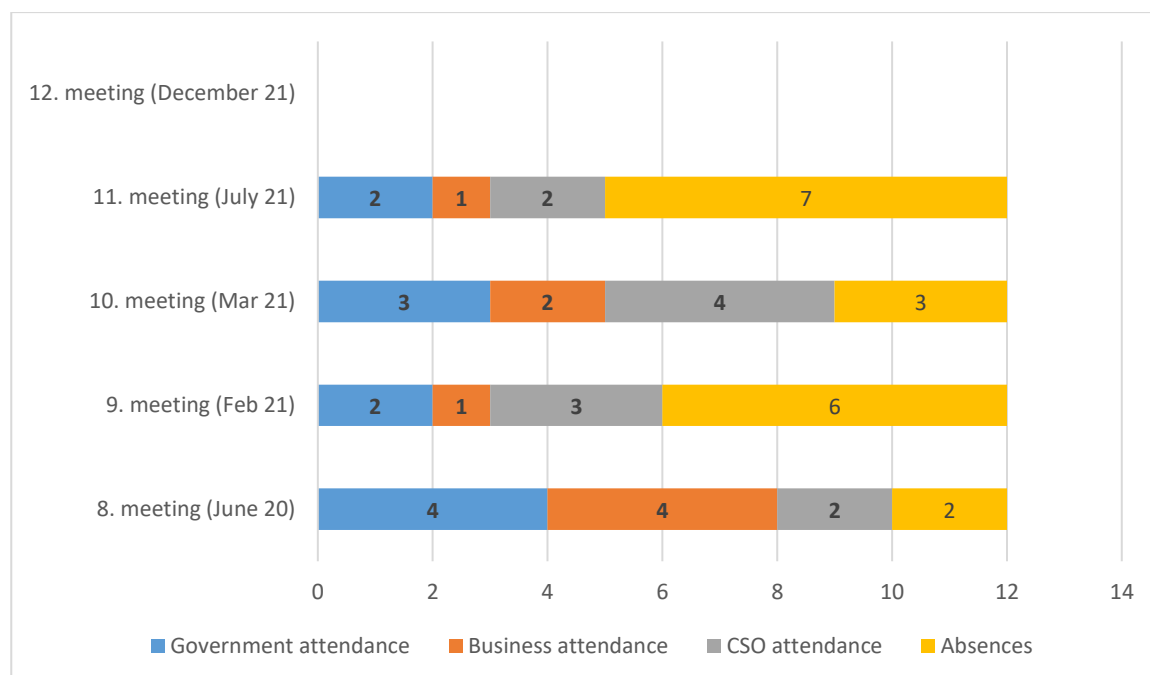
ID	Validation indicator	Scoring
B.3.3_2	Representatives from government, business and organised civil society must be appropriately qualified and fully, actively and effectively engaged in the FiTI.	Meaningful progress [2]
B.3.3_3	Representatives from organised civil society must be operationally, and in policy terms, independent from government and/or business.	Compliant [3]
B.3.3_4	Changes to the National MSG or to its Terms of Reference must be made public, if applicable.	Compliant [3]
		<u>Compliant</u> [Avg. 2.7]

Detailed remarks:

- ➡ **[B.3.3_1]** The FiTI National Multi-Stakeholder Group of Seychelles comprises of 12 representatives, equally assigned to the government, business and civil society stakeholder group.
- ➡ **[B.3.3_2]** The National MSG is seen as qualified to oversee the implementation of the FiTI in Seychelles.
 - 1) **Government stakeholder group:** This group includes two representatives from Seychelles' executive branch (i.e. from ministries) as well as two representatives from the legislative branch (i.e. from parliament). While it is positively noted that the two parliamentarians represent the current ruling party as well as the opposition, it is equally noted that the other two representatives come from the same Ministry (i.e. the Ministry of Fisheries and Blue Economy). One of these two representatives includes the FiTI National Lead. It is therefore recommended that a representative from another ministry (e.g. the Ministry of Finance) is included in the National MSG, and the FiTI National Lead chairs the National MSG as a non-voting member.
 - 2) **Business stakeholder group:** This group includes two representatives for small-scale fisheries, one representative for large-scale fisheries, and one representative for fish processing. It is positively noted that one representative is from Praslin, Seychelles second largest island, adding geographical diversity to the group.

- 3) *Civil society group*: This group includes representatives from a conservation CSO, Seychelles' sport fishing sector, Seychelles' youth as well as a representative from a CSO primarily unrelated to fisheries.

Whereas the National MSG is seen as sufficiently diverse to a range of different stakeholder views, evidence suggests that some members are not active and fully engaged in the National MSG. During this validation timeframe, the MSG met officially five times⁷², with the following attendance rates:



- ➔ **[B.3.3_3]** This assessment found no evidence that the four civil society representatives of Seychelles National MSG are operationally, and in policy terms, dependent on government and/or business.
- ➔ **[B.3.3_4]** As stated earlier, the size of the National MSG was initially set to 9 members and afterwards (in 2019), enlarged to 12 members, based on the demands of the civil society stakeholder group. This enlargement was approved by the Cabinet of Seychelles, without being largely disseminated to the wider public. The information about the

⁷² 8th meeting (12 June 2020); 9th meeting (5 February 2021); 10th meeting (31 March 2021); 11th meeting (29 July 2021); 12th meeting (6 December 2021). This information has been provided by the FiTI National Secretariat; the accuracy of the information has not been verified. The minutes for the December 2021 meeting have not been published yet.

In addition to the members of the National MSG, alternates also participate in certain meetings.

composition of the National MSG (i.e. names of members, as well as their alternates), the group's Terms of Reference as well as its workplans are publicly available on the website of the MoFBE.⁷³

Annual Workplan

ID	Validation indicator	Scoring
B.3.4_1	The National MSG must provide an updated Workplan for each upcoming reporting period.	<i>Inadequate progress [1]</i>
B.3.4_2	Each Workplan must provide a summary of FiTI activities undertaken in the previous reporting period, including an assessment of the level of progress in achieving the objectives set out in the previous Workplan(s).	<i>Not collated</i>
B.3.4_3	Each Workplan must outline objectives, constraints, activities and outputs in accordance with requirement A.6. ⁷⁴	<i>Not collated</i>
B.3.4_4	Each Workplan must be approved by the National MSG two months prior to the upcoming reporting period.	<i>Not collated</i>
		<i><u>Inadequate progress</u></i> <i>[Avg. 1.0]</i>

Detailed remarks:

As this validation covers the timeframe of activities after the Seychelles became an official FiTI Candidate country, the country's first workplan (2019-2020) is not included in this assessment.

- ➡ **[B.3.4_1]** Since the initial workplan for 2019-20, the National MSG has failed to provide any updated follow-up workplans, e.g. no workplan for 2021 was provided. In December 2021, the FiTI National Secretariat, under the guidance of Seychelles' FiTI National Lead, prepared a draft workplan for 2022, which covers the various requirements outlined in section B.3.4 of the FiTI Standard. However, this workplan has not been presented to the National MSG yet (a meeting is scheduled for March 2022).

⁷³ <http://www.mofbe.gov.sc/fiti/national-multi-stakeholder-group/>

⁷⁴ This includes information about uncompleted objectives of previous Workplan(s), if applicable; activities planned for the upcoming reporting period; recommendations identified by the National MSG in previous FiTI Report(s), if applicable; and recommendations from validations, if applicable.

The FiTI Standard encourages for workplans to reflect input from stakeholders outside of the National MSG. There is no evidence that such input has been collected for Seychelles' draft 2022 FiTI workplan.

Furthermore, The FiTI Standard encourages National MSGs to consider more regular updates and revisions of its workplans, in order to be useful as a management tool. This has not been done by Seychelles' National MSG.

Impact Report

In accordance with section B.3.5 of the FiTI Standard, a National MSG must publish an Impact Report every three years, preferably aligned with upcoming validations. Seychelles' first Impact Report is therefore due in 2023 (i.e. 3 years after Seychelles became an FiTI Candidate country). Therefore, this element is not taken into account in this validation.

6) Appraisal of progressive improvements

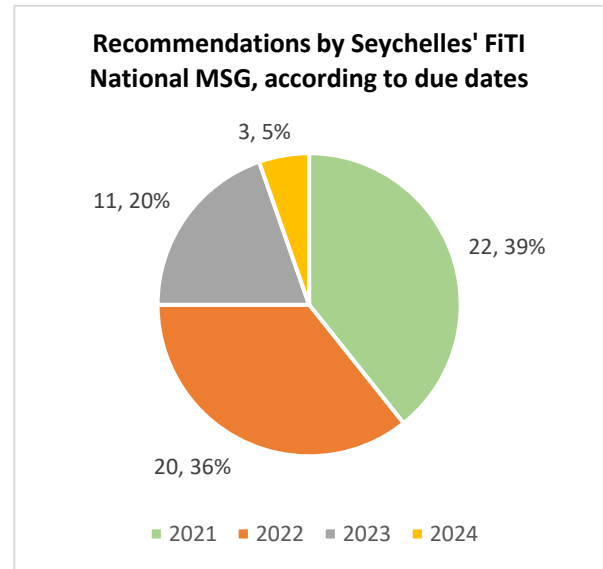
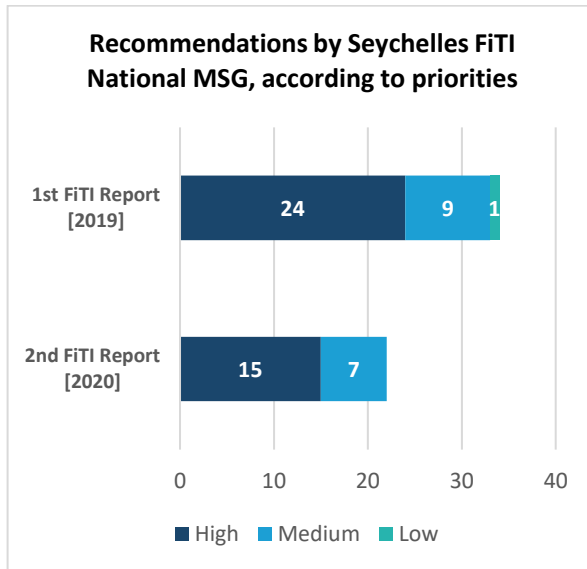
Progressive improvement is a key aspect of a country's FiTI implementation and subsequently also of its validation. The concept is anchored in FiTI Principle 7 which stipulates: *'Increasing transparency and participation must be feasible and introduced progressively in order to ensure the wide acceptance of this initiative.'* In other words, the FiTI does not expect all countries to have complete data for every transparency requirement from the beginning. Instead, public authorities must disclose the information they have, and where important gaps exist, they must demonstrate improvements over time. In accordance with the FiTI Standard, it is the responsibility of the National MSG to collectively agree on recommendations for addressing such gaps, and for the FiTI implementing country's government to follow up on these recommendations.⁷⁵

The principle of progressive improvement therefore has practical implications for the validation process, as a country can still initially achieve *'compliant'* status, even if some information required by the FiTI Standard is not available. This principle is in particular relevant when determining a FiTI implementing country's level of compliance during its first validation, as Guidance Note #3 on 'Validating countries' clearly stipulates that during a country's first regular validation, a country must not be validated as non-compliant with the FiTI Standard in case information is not available to the government. This is the case even if the National MSG considers the missing information to be important for achieving sustainable management of the fisheries sector.

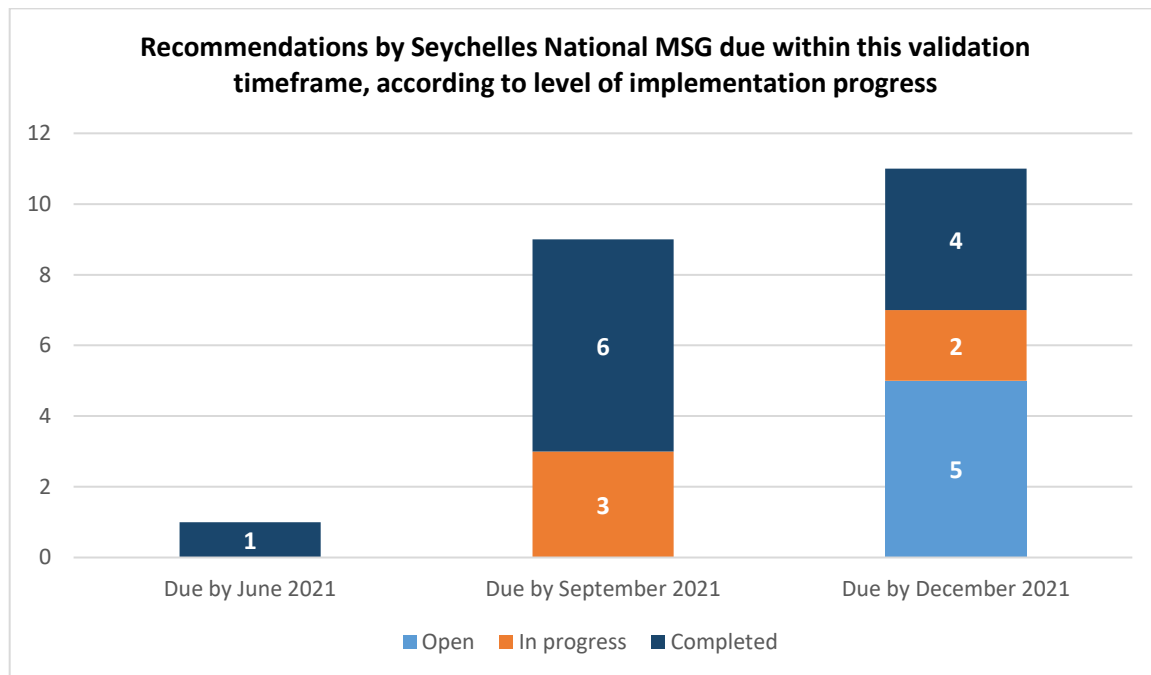
Furthermore, progressive improvement is not directly evaluated during a country's validation (e.g. as a standalone criterion/requirement). Nevertheless, the scope and extent of a country continuously improving transparency in its fisheries sector, e.g. by its government implementing recommendations issued by its National MSG via FiTI Reports, is an important guide when determining the overall assessment of compliance.

As part of Seychelles' first two FiTI Reports, the National MSG made a total of 56 recommendations to the government of Seychelles to improve transparency in its fisheries management, as shown below.

⁷⁵ A government is not obliged to implement the recommendations of the country's National MSG. In case the government decides not to follow a recommendation, or to address it at a later point in time then proposed by the National MSG, the reasons for this need to be clearly stated.



The level of government progress for implementing recommendations due within this validation timeframe can be summarised as follows:



Implementing the recommendations of the National MSG has resulted in tangible improvements in the availability and accessibility of government information in Seychelles, most notably:

- ➔ An online summary description of *tenure arrangements* of Seychelles' four fisheries (i.e. recreational fisheries, sport fisheries, scientific fisheries, and commercial fisheries (artisanal, semi-industrial, large-scale));⁷⁶
- ➔ An online *large-scale vessel registry* of all Seychelles-flagged and foreign-flagged vessels authorised to fish in Seychelles marine jurisdictional waters, as well as Seychelles-flagged vessels authorised to fish in third countries' marine jurisdictional waters and on the High Seas, including all vessel attributes of the FiTI Standard, as well as license information.

Reasons for which some of the five recommendations that were due by the end of 2021 have not yet been implemented by Seychelles' national authorities have been stated in the country's 2020 FiTI Report (Annex D). This assessment found no indication that such a lack of implementation constitutes a breach of the principles of this initiative.

⁷⁶ <https://www.sfa.sc/index.php/faqs>

7) Additional considerations

COVID-19 pandemic

As an initiative that is based on stakeholder participation and collaboration, the FiTI has been significantly impacted by the **COVID-19 pandemic**, on the international governance level, as well as in national implementations. The Seychelles' validation timeframe of April 2020 to December 2021 closely follows the escalation in the global disruption caused by the pandemic. In particular, several restrictions on meeting were in place in Seychelles during this timeframe, limiting face-to-face meetings between relevant stakeholders and posing problems for the National MSG's efforts to keep up the momentum for the FiTI.

Therefore, the publication of two FiTI Reports amid a global pandemic is seen as a remarkable achievement and underscores Seychelles' sincerity and commitment to enhancing transparency in fisheries management.

Presidential election 2020

In a landmark moment in the country's history, 2020 saw Seychelles undergo its first peaceful handover of power between political parties since the country's independence in 1976. This followed general elections held between 22-24 October for both a new President and National Assembly. Opposition candidate Wavel Ramkalawan of the Linyon Demokratik Seselwa (LDS) party won the presidential elections, and his party also claimed a majority in the National Assembly elections.

The transition resulted in the appointment of a new Cabinet (including Minister of Fisheries), as well as a restructuring of the former Ministry of Fisheries and Agriculture into the current Ministry of Fisheries and Blue Economy. Despite such upheaval, it should be noted that Seychelles progress implementing the FiTI has remained consistent, and there has been no indication of any discussions within the new government to reverse the country's commitment to the initiative.



Fisheries
Transparency
Initiative

Validation of the Republic of Seychelles

Annex II

Validation Report of the
Independent Validator
(April 2020 – December 2021)

**Independent Country Validation of the Implementation of the
Fisheries Transparency Initiative (FiTI) for the Republic of
Seychelles**

(April 2020 – December 2021)

Final report

Document prepared by: José Peiró Crespo
Independent validator

Date: 24/11/2022

Independent Country Validation: Seychelles

The Project “Independent Country Validation of the Implementation of the Fisheries Transparency Initiative (FiTI) for the Republic of Seychelles” is supported by [PROBLUE](#). PROBLUE is an Umbrella 2.0 program administered by the World Bank; it supports the development of integrated, sustainable, healthy marine and coastal resources.

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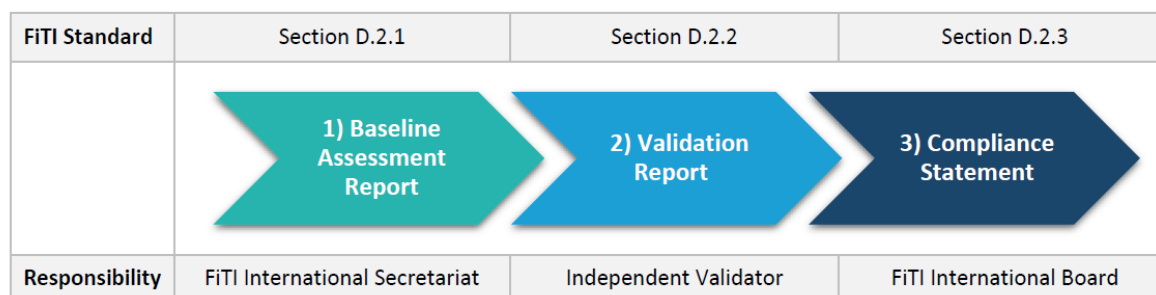
CEPS	Citizens Engagement Platform Seychelles
DBE	Department of the Blue Economy
EEZ	Exclusive Economic Zone
EU	European Union
FAO	Food and Agriculture Organisation of the United Nations
FBOA	Fishing Boat Owners Association
FiTI	Fisheries Transparency Initiative
GTA	Global Tuna Alliance
IO	Indian Ocean
IOTC	Indian Ocean Tuna Commission
ISSF	International Seafood Sustainability Foundation
MCS	Monitoring, Control and Surveillance
MESA	Ministry of Employment and Social Affairs
MFBE	Ministry of Fisheries and the Blue Economy
MSG	Multi-Stakeholder Group
NBS	National Bureau of Statistics
NGO	Non-Governmental Organization
ODA	Official Development Assistance
SFA	Seychelles Fishing Authority
SMSP	Seychelles Marine Spatial Plan Initiative
MESA	Ministry of Employment and Social Affairs

Executive Summary

The Fisheries Transparency Initiative (FiTI) is a global multi-stakeholder partnership that strengthens transparency and collaboration in marine fisheries management by making fisheries management more transparent and inclusive. The FiTI provides an internationally recognized framework (the FiTI Standard, organized into 12 thematic areas) that defines which information on marine fisheries should be published by governments.

The reputation of the FiTI as an initiative promoting good governance in fisheries, in particular transparency, participation and accountability, is one of the initiative's greatest assets and robust and objective assurance procedures play an important role in creating and maintaining FiTI's reputation to ensure equal treatment of all countries. Validations of implementing countries are therefore an essential part of the FiTI process (see also 'Guidance note #3: Validating countries' for more information). Validation verifies compliance of the country against the FiTI Standard's transparency requirements, procedural requirements, meaningful involvement of the stakeholders and impact of the FiTI in the country.

Regular validations occur in three steps - each building on the conclusions and recommendations of the previous phase – (see section D of the FiTI Standard). First, the FiTI International Secretariat prepares a Baseline Assessment Report making an initial evaluation of compliance against requirements in accordance with the FiTI Standard. Second, the Independent Validator, appointed by the FiTI International Board, must conduct a verification of the Secretariat's initial assessment and also determine recommendations to further strengthen the impact of the FiTI in the country. And third, the FiTI International Board reviews the Validator's assessments and recommendations and makes the final determination (Compliance statement) whether the individual requirements are met or not and determines the implementing country's overall level of compliance in accordance with provision D.1.2.



Whereas the Baseline Assessment Report (date: 31 March 2022), prepared by the FiTI International Secretariat is mainly based on desk-based research, the independent validation process is primarily focus on gathering information and viewpoints from stakeholders and key informants in the country (supported also by a previous desk-based research).

With that purpose, the independent validator conducted a site visit to the Republic of Seychelles between May 30 and June 12, 2022 to collect the stakeholder's viewpoints on the initiative. Twenty stakeholders and key informants were interviewed. All the stakeholders talked freely to the consultant and were happy to share their opinion about the FiTI, including strengths, weaknesses, and recommendations for improvement. Except for very few specific comments, no confidential issues were raised by any of the stakeholders.

Stakeholders interviewed included management representatives (government, Seychelles Fishing Authority (SFA), Indian Ocean Tuna Commission (IOTC)), industry representatives (industrial and small-scale fisheries, fishing processors and exporters, etc), civil society (representing a number of groups, including conservation, sport fishing, transparency, associations, non-governmental Organizations (NGOs), etc.) and some independents experts. Some of the stakeholders had past and present experience both within the private and public sectors, so that it is understood that their views do not represent only one specific sector. Eight (8) of the key informants were part of the National

Independent Country Validation: Seychelles

Multi-Stakeholder Group (MSG) (60% of the National MSG members), whereas twelve (12) were stakeholders from outside that group. It permitted to cross-check opinions from “inside” and “outside” the initiative. International stakeholders (ISSF, IOTC, GTA, etc) were also contacted in order to assess the impact of the initiative at the regional/global level.

Individual interviews were mainly conducted (only one group interview was held with the IOTC data team). Interviews lasted between 30 min and 2 hours. A complete list of the stakeholders interviewed, and the main issues covered in each interview is included in annex 1. It is important to emphasize that except for specific non-available documentation issues (such as the unpublished Fisheries agreements, workplan, etc.), which were clarified with the relevant informants during the site visit (National lead consultant and secretary), documents/websites were mainly checked during the preparation/desk-based research and the interviews focused on other issues: stakeholder involvement and participation in the initiative, public access to that information, strengths and weaknesses of the initiative, how to improve public debates and impacts, among other related issues.

A draft report was prepared by the consultant and distributed to the FiTI International Secretariat and the National MSG group for comments. In accordance with section D.2.1 of the FiTI Standard, the first draft did not include an overall assessment of compliance. Those comments have been addressed by the consultant and this final validation report prepared which includes an overall assessment of compliance.

Verification of the assessment of individual requirements

Transparency requirements

B.1.1 Public Registry of National Fisheries Laws, Regulations and Official Policy Documents

Objective: to ensure public access to all aspects of the legal and regulatory framework around which Seychelles' fisheries sector is structured.

A consolidated list of national legislation and official policy documents was first published in the 2019 FiTI Report and made publicly accessible on the website of the Ministry of Fisheries and Blue Economy (MFBE) during the 2020 FiTI reporting process. It seems to cover all relevant fisheries legislation and fisheries-related policies of importance in the country, as well as other relevant documents, such as fisheries plans and strategies. Some problems with that list have been highlighted, such as the lack of any information summarising published laws, regulations and policy documents, or the lack of the dates when these regulations were first introduced, which may negatively impact public access and use of that information, but these seem to be relatively minor issues.

During the site visit, conducted by the independent validator, no issues regarding the publication of laws and regulations were highlighted by any of the key informants interviewed. Therefore, **requirement B.1.1 Public Registry of National Fisheries Laws, Regulations and Official Policy Documents is scored as "Compliant"**.

ID	Validation indicator	Baseline Assessment Report scoring	Independent Validator scoring
B.1.1_1	The implementing country must provide an online, up-to-date registry of all national legislation and official policy documents related to the marine fisheries sector.	<i>Compliant [3]</i>	<i>Compliant</i>
B.1.1_2	The National MSG must decide on which areas of fisheries this applies to; however, at a minimum, copies of national laws, decrees and policy documents on fisheries management, trade and investment, as well as fisheries management plans must be included.	<i>Meaningful progress [2]</i>	<i>Meaningful progress</i>
		<i>Compliant [Avg. 2.5]</i>	<i>Compliant</i>

B.1.2 Fisheries Tenure Arrangements

Objective: to ensure public access to information about how fishing rights are accessed, used, and managed across Seychelles' marine fisheries.

SFA has published summary descriptions relating to the country's four main fisheries (i.e., commercial, recreational, sport, scientific), including information on fees payable, duration, fishing conditions, transferability and divisibility of such rights (including summary descriptions compiled by the National MSG as part of the country's 2019 FiTI Report).

Rules and procedures for Seychelles-flagged vessels to obtain authorisations to fish in a third country or the High Seas, have also implemented including the application form and application conditions).

Detailed licence information on the sea cucumber fishery has also been published.

There are no fisheries related 'traditional sites' in Seychelles. Therefore, [B.1.2_2] does not apply.

During the site visit, no issues regarding Fisheries tenure agreements were highlighted by any of the stakeholders. Given the significant progress that has been shown by Seychelles' national authorities in providing online information on fishing rights, **requirement B.1.2 Fisheries Tenure Arrangements is assessed as "Compliant"**.

ID	Validation indicator	Baseline Assessment Report scoring	Independent Validator scoring
B.1.2_1	The implementing country must publish a summary description of laws and decrees on fisheries tenure arrangements, including information as specified in requirement B.1.2 of the FiTI Standard.	<i>Compliant [3]</i>	<i>Compliant</i>
B.1.2_2	In case tenure, access or user rights are not codified, information on the current and planned approaches to securing such rights must be published.	<i>Not applicable</i>	<i>Not applicable</i>
		<i>Compliant [Avg. 3.0]</i>	<i>Compliant</i>

B1.3 Foreign Fishing Access Agreements

Objective: to ensure public access to information on the rights and responsibilities assumed by foreign fishing vessels operating in Seychelles' marine jurisdictional waters, as well as Seychelles-flagged fishing vessels operating in the waters of third countries.

Seychelles have four agreements allowing foreign vessels to fish in its waters, and two agreements allowing Seychelles-flagged vessels to fish in third country's waters. SFA has published the agreements signed between Seychelles and the European Union, Mayotte (EU), as well as access agreements signed with the government of Mauritius (including both Seychelles-flagged vessels to fish in Mauritian waters and Mauritius-flagged vessels to fish in Seychelles' waters). However, the private fishing access agreements signed between Seychelles and the Taiwan Deep-sea Tuna Longline Boat Owners and Exporters Association (TTA) and Top Fortune International (TFI) – granting access of foreign vessels to fish in Seychelles' waters – have not been published. This is one of the specific issues, the independent validator was told by the FiTI's International Secretariat to clarify.

During the site visit, the content of those agreements was discussed with the Ministry. They contain confidentiality clauses which prevent Seychelles from divulging the contents of the agreements without the approval of the other party. It is interesting though, that the most relevant information included in those agreements (fees paid, number of vessels, etc), has already been published in the FiTI reports.

A number of emails were sent by the Ministry of Fisheries representatives to the first two companies explaining the FiTI requirements and requesting permission to publish the agreements. Both companies preferred to keep them confidential until the renewal date. According to section B1.3, the non-publication of those agreements does not constitute an act of non-compliance with the FiTI Standard yet, but they need to be published before 2023¹. At the time of finalisation of this validation report, the Seychelles' government was renegotiating both agreements (but the exact renewal date is unclear, as several deadlines were indicated to the validator: “*next week, next month*” and the stakeholders from the National MSG even thought that these agreements had already been renewed)² and had pledged to remove such confidentiality clauses.

The status regarding the private access agreement with Dongwon Industries Co. Ltd remains unclear, but it seems that the company fish in Seychelles' waters in the absence of an agreement through the payment of a licence.

Only the EU-Seychelles agreement has been subject to an evaluation, these evaluation reports (for different years) are now available on the SFA website.

¹FiTI Standard allows for a 3-year period (from the date when the coastal state becomes a FiTI Candidate country) for coastal states to negotiate with foreign parties to make such agreements public.

² During the review of the draft validation report the Department of fisheries indicated that these agreements were being negotiated in November 2022 and expect completion by December 2022.

No information is currently published by Seychelles' national authorities regarding stakeholder discussions and consultations prior to negotiation, monitoring and signing of new foreign fishing access agreements. And according to the stakeholder's viewpoints collected by the validator, it does not appear that information is going to be shared (or external stakeholders are going to be included) in the renegotiation of any of these private agreements. The potential impact the foreign fleet has on the tuna resources, also targeted by the national fleet is a controversial issue, which has generated many disputes in Seychelles, in particular stemming from concerns voiced by the country's small-scale fishing community. The no inclusion of external stakeholders during the renewal of these agreements seems to be a too important weaknesses of the process to be overlooked during this validation process³. As one of the stakeholders interviewed indicated: "*in many cases, the process is even more important than the outcome*". Based on the above information, B.1.3_3 is assessed as no progress.

The validator would like to emphasise the lack of stakeholder involvement during the negotiation of these Foreign Fishing Access Agreements and the lack of studies or reports carried out by national authorities or foreign parties to these private agreements providing evaluation or oversight of them, were one of the main issues identified by the stakeholders during the site visit. Although the department of fisheries have indicated that a consultant has recently been recruited to undertake an independent assessment of the EU SFPAs and Mauritius SFPAs, and compliance levels with the terms and conditions of the fisheries agreements seem to be regularly reviewed by the government by conclusion are not made public. In the 2020 FiTI report a recommendation was set by the National MSG in reference to this issue [2020-3_2_Medium priority MOFBE should put in place a strategy to review the implementation of all foreign fishing access agreements including an assessment of compliance with the terms and conditions of the agreements and make publicly available a report containing the findings].

Therefore, requirement B1.3 Foreign Fishing Access Agreements is scored as "Meaningful progress".

ID	Validation indicator	Baseline Assessment Report scoring	Independent Validator scoring
B.1.3_1	The implementing country must publish the contracts of all foreign fishing access agreements, including their associated protocol(s).	<i>Meaningful progress [2]</i>	<i>Meaningful progress</i>
B.1.3_2	The implementing country must publish studies or reports undertaken by national authorities or foreign parties to an agreement providing evaluation or oversight of the agreement, if available.	<i>Compliant [3]</i>	<i>Compliant</i>
B.1.3_3	The implementing country must publish documentation derived from any national stakeholder consultation undertaken with respect to the preparation, negotiation or monitoring of the agreements, if available.	<i>Inadequate progress [1]</i>	<i>Inadequate progress</i>
		<i>Meaningful progress [Avg. 2.0]</i>	<i>Meaningful progress</i>

B.1.4 The State of Fisheries Resources

³ During the review of the draft validation report the Department of fisheries indicated: "External stakeholders are included in the renewal of agreements. In the case of EU Seychelles SFPAs, Community representation are done through engagement with CEPs and Associations. Engagement is specifically related to whether there is a form of sectoral support derived from the agreement". However, it does not seem to apply to fisheries agreements with private companies.

Independent Country Validation: Seychelles

Objective: to enhance public access to information regarding the health of Seychelles' marine fisheries resources.

As indicated by the Baseline Assessment Report prepared by the FiTI International Secretariat, SFA has published on its website stock status summaries of fish species that have been assessed within the last four years, including tuna and tuna-like species which fall under the management mandate of the Indian Ocean Tuna Commission (IOTC). This includes information about the stock assessment methodologies. Moreover, SFA has also published its work programme for future stock assessments up to the year 2024.

The National MSG reports have included summary tables in its FiTI reports on the stock status of the most important national species, using easy-to-understand colour-coding to indicate the health of fish stocks improving understanding. It is interesting though that there not seem to be any contact between the FiTI or the National MSG and the IOTC secretariat which is also based in the country.

Based on the presented information, **requirement B1.4 The State of Fisheries Resources is scored as “Compliant”**.

ID	Validation indicator	Baseline Assessment Report scoring	Independent Validator scoring
B.1.4_1	The implementing country must publish the most recent national reports on the state of fish stocks, including any information on trends in the state of stocks and conclusions on the reasons for change, as well as studies or reports undertaken by national authorities that assess the sustainability of fishing.	<i>Compliant [3]</i>	<i>Compliant</i>
B.1.4_2	The implementing country must provide information on the methods and data used to assess fish stocks.	<i>Compliant [3]</i>	<i>Compliant</i>
B.1.4_3	The implementing country must publish on ongoing or planned efforts to update and expand fish stock assessments.	<i>Compliant [3]</i>	<i>Compliant</i>
		<i>Compliant [Avg. 3.0]</i>	<i>Compliant</i>

B.1.5 Large-Scale Fisheries

Objective: to enhance public access to information regarding the industrial fishing vessels allowed to fish in Seychelles' jurisdictional waters (and for Seychelles-flagged vessels in third country waters/on the High Seas)

This requirement includes nine validation indicators. Due to the limited extension of this validation report, not all the validation indicators are discussed in detail here, but more information can be found in the Baseline assessment report and the 2020 FiTI report.

SFA has compiled and published a spreadsheet with details of all large-scale fishing vessels licenced to fish in Seychelles' waters in 2020, as well as Seychelles-flagged vessels operating in third countries. This registry contains information on all 14 vessel registration attributes as well as licence payment information in line with the requirements of the FiTI Standard.

However, data gaps, missing information and discrepancies in that data have been highlighted by the National MSG (e.g., beneficial ownership, no information on owner's nationality, discrepancies from different sources, etc) (see the 2020 FiTI report for more information).

In regard to how much these vessels pay for fishing opportunities, during the 2020 FiTI reporting process, SFA also published online the licence payments made by large-scale fishing vessel operators.

Data on retained catches from Seychelles-flagged large-scale fishing vessels was already available online before the validation timeframe, but there have been some issues with catch data from the

Independent Country Validation: Seychelles

industrial longline fishery. The independent validator was told by the FiTI International Secretariat to explore this issue further. The SFA indicated that logbook returns from the industrial longline fleet were improving and that the catch data would be available to be published “soon”, but no specific timeframes were given. This circumstance affects to the scores given in B.1.5_3, _4 and _5.

Information on evaluations or audits of the economic, social and food security contribution of the large-scale fishing sector have not been collated.

Therefore, based on the discrepancies indicated above, the lack of important data such beneficial ownership and catch data for the industrial fleet, **B.1.5 Large-Scale Fisheries is scored as ‘Meaningful progress’**.

ID	Validation indicator	Baseline Assessment Report Scoring	Independent Evaluator Scoring
B.1.5_1	The implementing country must provide an online, up-to-date registry of all nationally-flagged and foreign-flagged large-scale vessels authorised to fish in the country’s marine jurisdictional waters, and of all nationally-flagged large-scale vessels authorised to fish in third countries’ marine jurisdictional waters and on the High Seas, including information on 14 attributes, as listed in section B.1.5 of the FiTI Standard.	<i>Meaningful progress [2]</i>	<i>Meaningful progress</i>
B.1.5_2	The implementing country must publish accessible and complete information on payments made by each vessel listed in the vessel registry for their fishing activities, including information on 4 attributes, as listed in section B.1.5 of the FiTI Standard. ³⁸	<i>Compliant [3]</i>	<i>Compliant</i>
B.1.5_3	The implementing country must publish information on the quantity of annual recorded retained catches by nationally-flagged vessels listed in the vessel registry, including according to species or species groups, disaggregated by fishing authorisations or gear type as well as marine jurisdictional waters, High Seas and third country waters, presented for the flag state.	<i>Compliant [3]</i>	<i>Meaningful progress</i>
B.1.5_4	The implementing country must publish information on the quantity of annual recorded retained catches by foreign-flagged vessels listed in the vessel registry according to species or species groups, disaggregated by fishing authorisations or gear type, presented for each flag state separately.	<i>Compliant [3]</i>	<i>Meaningful progress</i>
B.1.5_5	The implementing country must publish information on the quantity of annual recorded landings in national ports according to species or species groups caught in the country’s marine jurisdictional waters, disaggregated by fishing authorisations or gear types, presented for each flag state separately.	<i>Compliant [3]</i>	<i>Meaningful progress</i>
B.1.5_6	The implementing country must publish information on the quantity of annual recorded transshipments at sea or landings in foreign ports according to species or species groups caught in the country’s marine jurisdictional waters, disaggregated by fishing authorisations or gear types, presented for each flag state separately.	<i>Meaningful progress [2]</i>	<i>Meaningful progress</i>
B.1.5_7	The implementing country must publish information on recorded quantities of discards	<i>Meaningful progress [2]</i>	<i>Meaningful progress</i>

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	according to species or species groups, disaggregated by fishing authorisations or gear types, presented for each flag state separately, if available.		
B.1.5_8	The implementing country must publish the most recent studies and reports on recorded fishing effort by vessels, disaggregated by fishery or gear type and by flag state, if available.	<i>Meaningful progress [2]</i>	<i>Meaningful progress</i>
B.1.5_9	The implementing country must publish evaluations or audits of the economic, social and food security contribution of the large-scale fishing sector, if available.	<i>Not collated</i>	<i>Not collated</i>
		<i>Compliant [Avg. 2.5]</i>	<i>Meaningful progress</i>

B.1.6 Small-Scale Fisheries

Objective: to enhance public access to information around the scope as well as economic, social and food & nutrition contributions of Seychelles' small-scale fisheries.

This requirement includes seven validation indicators. Again, not all of them are covered in detail in this rationale.

Information on the total numbers of small-scale fishing vessels (disaggregated according to different categories), and catch data by species, is published in Fisheries Statistical Reports (although some issues with catch data such as the lack of information on some species (e.g.: sea cucumber, lobster) have been reported.

Total number of fishing licenses (disaggregated according to categories) was published by the SFA as part of the 2020 FiTI reporting process. And the total numbers of fishers engaged in the fishing sector is published in the 2019 and 2020 FiTI report. The total payments made from small-scale fisheries related to fishing authorisations, catches and landings (again disaggregated according to categories) was also made available to the National MSG as part of the 2020 FiTI reporting process, and total amounts were published in the report that year.

No data on discards in the small-scale fleet seems to be collected by the authorities (due to its low volume) and as in the large-scale fisheries requirement, evaluations or audits of the economic, social and food security contribution of the small-scale fisheries sector are scarce but a market and gap analysis study on the food security contributions of the small-scale fisheries sector was conducted in 2014 and it has not been published yet.

Therefore, although some “minor” issues are identified, **B.1.6 Small-Scale Fisheries** is scored as “**Meaningful progress**”.

ID	Validation indicator	Baseline Assessment Report scoring	Independent Validator scoring
B.1.6_1	The implementing country must publish information on the total numbers of small-scale fishing vessels, disaggregated according to categories of fishing or gear types.	<i>Compliant [3]</i>	<i>Compliant</i>
B.1.6_2	The implementing country must publish information on the total number of fishing licenses issued to small-scale fishing vessels, disaggregated according to categories of fishing authorisations.	<i>Compliant [3]</i>	<i>Compliant</i>
B.1.6_3	The implementing country must publish information on the total numbers of fishers engaged in the fishing sector, indicating the gender of fishers and the proportion that are engaged in full-time work, seasonal or part	<i>Compliant [3]</i>	<i>Compliant</i>

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	time fishing, occasional fishing or recreational fishing.		
B.1.6_4	The implementing country must publish information on the total payments made from small-scale fisheries related to fishing authorisations, catches and landings, disaggregated according to categories of fishing authorisations or gear types and indicating the recipient of these payments.	<i>Compliant [3]</i>	<i>Compliant</i>
B.1.6_5	The implementing country must publish information on the quantity of catches, disaggregated according to species, categories of fishing authorisations and gear types.	<i>Inadequate progress [1]</i>	<i>Inadequate progress</i>
B.1.6_6	The implementing country must publish information on the total volumes of discards, disaggregated according to species, categories of fishing authorisations and gear types.	<i>Not collated</i>	<i>Not collated</i>
B.1.6_7	The implementing country must publish evaluations or audits of the economic, social and food security contribution of the small-scale fisheries sector, if available.	<i>Not collated</i>	<i>Inadequate progress</i>
		<i>Compliant [Avg. 2.6]</i>	<i>Meaningful progress</i>

B.1.7 Post-Harvest Sector and Fish Trade

Objective of this requirement is to enhance public access to key information in the post-harvest value chain, in particular the scope of Seychelles' reliance on fish-related import and exports.

This requirement includes a number of validation indicators related to the volume of fish processed, exports, imports, among other issues. The only processing industry visited by the independent validator during the site visit was SeaHarvest. Other two stakeholders with industry background were also interviewed (see Annex II for more information). However, these interviews focused on fisheries issues (small-scale and industrial fisheries) and no issues related to fish processing/exports/imports were highlighted by any of the stakeholders (although benefits/disadvantages of being transparent for the fishing industry were widely discussed).

Therefore, the score given for this requirement is **entirely based on the information provided in the baseline assessment report prepared by the FiTI International Secretariat and B.1.7 Post-Harvest Sector and Fish Trade is scored as “Meaningful progress”**.

ID	Validation indicator	Baseline Assessment Report scoring	Independent Validator scoring
1.7_1	The implementing country must publish information on the total quantity of fish and fish products produced, disaggregated by species and fish products.	<i>Meaningful progress [2]</i>	<i>Meaningful progress</i>
B.1.7_2	The implementing country must publish information on the total quantity of imports of fish and fish products, disaggregated by species and fish products, indicating the country of their origin.	<i>Inadequate progress [1]</i>	<i>Inadequate progress</i>
B.1.7_3	The implementing country must publish information on the total quantities of exports of fish and fish products, disaggregated by species and fish products, indicating the country of their destination.	<i>Compliant [3]</i>	<i>Compliant</i>

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B.1.7_4	The implementing country must publish information on the total number of people employed in commercial fisheries sectors, including the number of men and women working in specific sub-sectors.	<i>Not collated</i>	<i>Not collated</i>
B.1.7_5	The implementing country must publish information on the total number of people employed in informal fisheries sectors, including the number of men and women working in specific sub-sectors.	<i>Inadequate progress [1]</i>	<i>Inadequate progress</i>
B.1.7_6	The implementing country must publish reports or studies on wages in the post-harvest sector, if available.	<i>Not applicable</i>	<i>Not applicable</i>
		<i>Meaningful progress [Avg. 1.8]</i>	<i>Meaningful progress</i>

B.1.8 Fisheries Law Enforcement

Objective: to enhance public access to information around the scale and impact of non-compliance with national fisheries regulations (enforcement and compliance in the country, IUU fishing, etc.).

This requirement includes four validation indicators. Two of the indicators require the country to publish information on the national activities and strategies, and the financial and human resources used/deployed for ensuring compliance of fishing vessels and the post-harvest sector.

No comprehensive information has been provided by the authorities in this regard. The Fisheries Comprehensive Plan (2019) and the Fisheries Policy and Strategic Plan (2019) were published prior to the validation timeframe (but this last remain valid until 2023). And the Seychelles National Plan of Action for Sharks (2016 – 2020) and the MCS Plan for the Mahé Plateau Demersal Fishery Management Plan (2020) afterwards. The National Plan of Action (NPOA) for Illegal, unreported and unregulated (IUU) fishing has not been published.

During the site visit, several stakeholders highlighted issues with fisheries compliance in Seychelles. They considered that the enforcement capacity of the authorities in the country is weak which makes difficult to monitor compliance in the industrial longline fleet or to enforce compliance with management measures for other initiatives (Mahé Plateau Fisheries Management Plan, Seychelles Marine Spatial Plan).

Validation indicator B.1.8_3 and B.1.8_4 of this requirement, require the country to publish information on the total number of inspections and a record of convictions for major offences in the fisheries sector for the last five years, indicating the name of the company or vessel owner, the nature of the offence and the penalty imposed. The SFA annual report includes number of inspections (this information was also published in the 2020 FiTI report). However, very limited information about offences is available. In this case, the validator was told by the SFA that information about major offences has been collected since 1990 and it is available to be published “soon”, but no timeframes were given.

Therefore, some missing information has been identified, and **B.1.8 Fisheries Law Enforcement awards an “Meaningful progress” score.**

ID	Validation indicator	Baseline Assessment Report scoring	Independent Validator scoring
B.1.8_1	The implementing country must publish information on the national activities and strategies used for ensuring	<i>Meaningful progress [2]</i>	<i>Meaningful progress</i>
B.1.8_2	The implementing country must publish information on the financial and human	<i>Meaningful progress [2]</i>	<i>Meaningful progress</i>

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	resources deployed by the government to ensure compliance with national legislation.		
B.1.8_3	The implementing country must publish information on the total numbers of inspections of fishing vessels at sea and in ports.	<i>Compliant [3]</i>	<i>Compliant</i>
B.1.8_4	The implementing country must publish a record of convictions for major offences in the fisheries sector for the last five years, indicating the name of the company or vessel owner, the nature of the offence and the penalty imposed.	<i>Inadequate progress [1]</i>	<i>Inadequate progress</i>
		<i>Meaningful progress [Avg. 2.0]</i>	<i>Meaningful progress</i>

B.1.9 Labour Standards

Objective: to enhance public access to information around national authorities' strategies and activities to ensure that high labour standards are applied to all parts of Seychelles' fisheries sector.

The Ministry of Employment and Social Affairs (MESA) is responsible for monitoring and enforcing laws on labour standards in Seychelles (for all sectors, including the fisheries sector). No information about national laws on labour standards or national strategies on labour rights have been published in the country. Only limited information on financial and human resources deployed to enforce the laws on labour standards in the fisheries sector was published in the FiTI Report. However, no recommendations have been included in any of the FiTI report to address these data gaps.

MESA reported that no labour offences were recorded for the fisheries sector in 2020.

No specific issues about labour standards were raised by any of the stakeholders interviewed by the consultant. Therefore, **B1.9 Labour Standards** awards a “**Meaningful progress**”, score which **entirely based on the justifications given by the FiTI International Secretariat in the baseline assessment report, as no information is available to state otherwise.**

ID	Validation indicator	Baseline Assessment Report scoring	Independent Validator scoring
B.1.9_1	The implementing country must publish a summary description of national laws on labour standards applicable for national and foreign workers employed in the fishing sector at sea and in the post-harvest fisheries sector.	<i>No progress [0]</i>	<i>No progress</i>
B.1.9_2	The implementing country must publish information on the public authorities responsible for monitoring and enforcing laws on labour standards.	<i>Meaningful progress [2]</i>	<i>Meaningful progress</i>
B.1.9_3	The implementing country must publish documents, including policy statements and evaluations, regarding a national strategy, if applicable, or related activities for enforcing the laws on labour standards in the fisheries sector, including total figures on the financial and human resources deployed by the government.	<i>Inadequate progress [1]</i>	<i>Inadequate progress</i>
B.1.9_4	The implementing country must publish information on the role and legal standing of	<i>Meaningful progress [2]</i>	<i>Meaningful progress</i>

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	anybody that has a governmental mandate to receive labour-related complaints from workers in the fishing sector and in the post-harvest sector.		
B.1.9_5	The implementing country must publish the total number of offences committed by employers in the fisheries sector that have been resolved by the authorities.	<i>Compliant [3]</i>	<i>Compliant</i>
		<i>Meaningful progress [Avg 1.6]</i>	<i>Meaningful progress</i>

B.1.10 Fisheries Subsidies

Objective: to enhance public access to information around the extent and purpose of government subsidies offered to Seychelles' fisheries sector.

This requirement includes only two validation indicators requiring the government to publish information on the type, values and recipients of government financial transfers or subsidies to the fisheries sector and on the average annual value of any fuel subsidies per unit of fuel in nominal and percentage terms.

Generally speaking, information on subsidies in the small-scale fishery, including information on the fuel incentive scheme (FIS) and on ice subsidies is available, but information on the subsidies in the large-scale sector is null.

During the site visit, the validator was told by the country's FiTI National Lead that information on the meaning of fisheries subsidies needed to be clarified before being able to have this information collated. No specific information on that issue was given by the Ministry of Finance. The lack of information about subsidies in the large-scale fishery was highlighted as a problem by the small-scale fishery representatives.

Based on the lack of information on subsidies for the industrial fleet, which creates a comparative grievance between fleets, making relationship between both fleets even more difficult, **B.1.10 Fisheries Subsidies is scored as "Inadequate progress"**.

ID	Validation indicator	Baseline Assessment Report scoring	Independent Validator scoring
B.1.10_1	The government must publish information on the type, values and recipients of government financial transfers or subsidies to the fisheries sector.	<i>Inadequate progress [1]</i>	<i>Inadequate progress</i>
B.1.10_2	The government must publish information on the average annual value of any fuel subsidies per unit of fuel in nominal and percentage terms.	<i>Meaningful progress [2]</i>	<i>Inadequate progress</i>
		<i>Meaningful progress [Avg. 1.5]</i>	<i>Inadequate progress</i>

B.1.11 Official Development Assistance

Objective: to increase public access to information regarding official development assistance (ODA), which can represent an important source of funds and support for a country's fisheries sector.

This requirement includes two validator indicators requiring the government to publish information on public sector projects related to fisheries and marine conservation, funded by bilateral, multilateral and private donors; and to publish evaluations conducted for those projects.

A list of fisheries-related public sector development projects has been provided in the FiTI Reports but there is not a comprehensive overview of the conservation-related public sector development

projects available. A high priority recommendation given by the national MSG in the 2019 FiTI report in this regard, has not been addressed yet by the government.

Information on evaluations for fisheries-related public sector development projects are also included in the 2020 FiTI report, but no information on the conservation-related public sector development projects seems to be available. Therefore, **B.1.11 Official Development Assistance awards an “Inadequate progress” score.**

ID	Validation indicator	Baseline Assessment Report scoring	Independent Validator scoring
B.1.11_1	The government must publish information on public sector projects related to fisheries and marine conservation, funded by bilateral, multilateral and private donors, including information on the projects’ value, purpose and outputs.	<i>Meaningful progress [2]</i>	<i>Inadequate progress</i>
B.1.11_2	The government must publish corresponding project evaluations, if applicable.	<i>Meaningful progress [2]</i>	<i>Inadequate progress</i>
		<i>Meaningful progress [Avg. 2.0]</i>	<i>Inadequate progress</i>

B.1.12 Beneficial Ownership

Objective: to enhance public access to information around the existing legal and procedural framework of who ultimately owns and controls the companies operating in Seychelles’ fisheries sector.

This requirement includes five validation indicators, requiring the government to publish legislation on beneficial ownership, the country’s legal definition of that term and to keep a register of beneficial owners. They also require the government to publish rules and procedures for incorporating beneficial ownership (for fisheries) and the current status and discussions around beneficial ownership transparency in fisheries.

Seychelles seems to be compliant with the first two general requirements, as the Beneficial Ownership Act and Regulations (2020), which legislates beneficial ownership in the country, is publicly available, and the term beneficial ownership is clearly defined there. A register of beneficial owners is being created, but it has not finished yet (and it will not be made public). Although the FiTI standard does not require to make it public, it is unclear how access to this information will be regulated.

However, there is a lack of information regarding beneficial ownership in fisheries. The National MSG considered that this information has been neglected in Seychelles and although the Fisheries Act requires the fisheries agency to collect beneficial owner information upon the registering of fishing vessels, it is rarely done because it does not constitute an offence for vessel operators not to divulge this information (and no penalties are imposed in the Act).

The MFBE informed the National MSG that it has started to work on policy/implementation procedures for addressing beneficial ownership transparency, but no timelines were given on when such a policy will be applied.

During the site visit, SFA indicated to the consultant that “*beneficial ownership was a controversial issue*”, and although sharing this information may be “*attractive, because it pushes people to share information*”, it was not specified if this information is being currently collected, if it will be included at some point in the national register and how access to that information will be regulated. Therefore,

B.1.12 Beneficial Ownership is scored as “Meaningful progress”.

ID	Validation indicator	Baseline Assessment Report scoring	Independent Validator scoring
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Independent Country Validation: Seychelles

B.1.12_1	The government must publish the legal basis for beneficial ownership transparency in the country.	<i>Compliant [3]</i>	<i>Compliant</i>
B.1.12_2	The government must publish the country's legal definition of beneficial ownership.	<i>Compliant [3]</i>	<i>Compliant</i>
B.1.12_3	The government must publish information on the availability of a public register of beneficial owners.	<i>Compliant [3]</i>	<i>Compliant</i>
B.1.12_4	The government must publish the rules and procedures for incorporating beneficial ownership in filings by companies to corporate regulators, stock exchanges or agencies regulating the access to fisheries.	<i>Compliant [3]</i>	<i>Meaningful progress</i>
B.1.12_5	The government must publish the current status and discussions around beneficial ownership transparency in fisheries.	<i>Compliant [3]</i>	<i>Meaningful progress</i>
		<i>Compliant [Avg. 3.0]</i>	<i>Meaningful progress</i>

Procedural requirements for FiTI Reports

B.2.1 Reporting Requirements

The National MSG have compiled information and published in the FiTI reports annually since 2019 (for calendar years 2019 and 2020). For each of the 12 transparency requirement, the FiTI Reports provide the main findings (including summaries) and include recommendations for improvements on how to strengthen the availability of accessible, complete and up-to-date information in the public domain. It also includes summaries for each requirement and a list of annexes summarising the most relevant information. For more specific information, please refer to the baseline assessment report.

For B2.1 (also for B2.2. and B2.3 below), the scores given by the independent validator to all the indicators coincide with those given by the FiTI international secretariat in the baseline assessment report. Therefore, due to the high number of indicators and the limited extension of this report, the scoring tables for these three requirements have not been included here but they can be found in the baseline assessment report.

Therefore, **B.2.1 Reporting Requirements scores as “Compliant”**.

B.2.2 Reporting Deadlines and Periods

The two FiTI reports published for 2019 and 2020 cover the 12 transparency requirements and the reporting periods were adapted to data availability and the initiative requirements. For more specific information, please refer to the baseline assessment report.

Therefore, **B.2.2 Reporting Deadlines and Periods scores as “Compliant”**.

B.2.3 Reporting Process

This requirement includes ten validation indicators.

The 2019 and 2020, FiTI Reports were prepared by Dr Jude Bijoux (PhD), acting as the country's Report Compiler. The appointment of Dr Jude Bijoux was based on the Terms of Reference of the SWIOFish3 (GEF project) which funded the FiTI reports and was endorsed by the National MSG.

The compiler consulted with national organisations (SFA, Department of Fisheries, etc) in order to prepare the reports (selecting the most adequate data sources, trying to resolve discrepancies in the information found, etc) and presented it to the National MSG, which review and debate the findings, provide comments and approve the reports. These reports were finally reviewed by the FiTI International Secretariat prior to publishing in order to review completeness against the FiTI reporting requirements.

During the site visit the independent validator interviewed Dr Jude Bijoux. He is an experienced expert with a very good knowledge of fisheries in the country. He seems to support the initiative and advocates the importance of being transparent in fisheries. Although, some external stakeholders indicated during the interviews that it was unclear if a local consultant, with previous experience working with the government, was the best fit for the role (due to “conflict of interest” issues), several stakeholders within the National MSG indicated that he was a thorough compiler and even some of them added that they were sad that he may not prepare future reports to maintain the independence of the process. Therefore, **B.2.3 Reporting Process is scored as “Compliant”**.

Two concerns though. One refers to B2.3_6. Several discrepancies were found by the compiler in some of the numbers collected (e.g., in the number of semi-industrial vessels licenced in 2020 shown in the Semester 1 Fisheries Statistical Report and the list published on the SFA website), but these problems seem to be relatively easy to solve.

However, there is an issue, which although is also relevant for the Requirements for National Implementation Framework section (and covered there), which is important to highlight here: more members of the National MSG were involved in the review of the country’s first (2019) FiTI Report, than in the second (2020) FiTI Report. In line with the opinions provided to the independent validator by several stakeholders within the National MSG, it seems to demonstrate an increasing level of disaffection with the FiTI and the benefits it may bring to the country. At some point, during the interview with the report compiler, the independent validator felt that the compiler was the one trying to incentive participation and bringing the most relevant issues to light to create debate within the National MSG. It was also pointed out that although some of the stakeholders were there in the meetings, they did not participate in the discussions. And it was also indicated that although fisheries-related information has been published by the authorities based on the recommendations given in the FiTI reports, there is not a “*real commitment*” within the management system to be transparent, not just with data but also in the fisheries management and decision-making processes and “*transparency needs to be better integrated in the work of the institutions*”.

B.2.4 Report Dissemination and Public Debate

This requirement includes a number of validation indicators related to how the FiTI reports must be made (in a clear and accessible style, be easily available online under an open license, etc). For those requirements, the reports seem to be adequate, they are written in a comprehensible and clear style, they also include visual elements, and which seems important, they include summaries in the annexes of some of the information discussed, which make information easy to understand and use (and in some cases make unnecessary to access the original sources of data which may be less user friendly).

FiTI Reports were widely distributed among key audiences through a number of ways (news, flyers, official notes, email campaigns, etc) although the baseline assessment report indicates: “*Seychelles is struggling with the limited distribution of the country’s FiTI Reports to key national stakeholders*”.

However, there are one important issue which need to be highlighted here: B.2.4_3 indicates: “*The National MSG must ensure that the main findings of the FiTI Report contribute to public debates on how the fisheries sector is managed, enabling relevant stakeholders as well as citizens of FiTI implementing countries to demand reforms towards better governance of their marine fisheries*”.

Based on the opinions collected by the independent validator, the interest in the initiative by both the National MSG members and the general public appears to have decreased since the initiative started. For example, only the MSG representative of the industrial fishing fleet indicated that he had distributed the report to the member of his association (and the report compiler confirmed that he received feedback from them during the compilation process). On the other hand, two representatives of the civil society organizations indicated that the CEPS (*Note: these representatives officially represent the CEPS within the multistakeholder group, but CEPS is an association of associations. So, they are really representing their own associations (conservation and sport fishing) in the initiative*) do not seem to be interested in the findings of the FiTI reports and although they suggested to prepare presentations to other associations within the group to spread this information, neither the representatives of CEPS nor other associations showed any interest.

There is also no indication that the information published by the FiTI is contributing to public debate on how the fisheries sector is managed, or how this information feeds into public policy making. Several stakeholders from outside the national MSG indicated that they have read “*some parts*” of the FiTI reports, that it was just a “*box-ticking initiative*” and they had lost interest seeing that nobody was demanding reforms and “*no changes/improvements/management actions*” have occurred despite the information from the reports was publicly available. The main issues of interest identified by most of the stakeholders interviewed were: Foreign Fishing Access Agreements (B1.3), Beneficial Ownership (B.1.12) and The State of Fisheries Resources (B.1.4) (mainly related to the status of the yellowfin tuna stock in the Indian Ocean). It is important to point out that the stakeholders interviewed by the independent validator all worked (or were interested) in fisheries/marine conservation issues which seems to indicate a clear lack of engagement among key stakeholders and therefore by the general public.

Therefore, it is considered that the public debate is not being created by the initiative, and **B.2.4 Report Dissemination and Public Debate** awards an “**Inadequate progress**” score.

ID	Validation indicator	Baseline Assessment Report scoring	Independent Validator scoring
B.2.4_1	FiTI Reports must be comprehensible and written in a clear and accessible style.	<i>Compliant [3]</i>	<i>Compliant</i>
B.2.4_2	FiTI Reports must be widely distributed among key audiences, including government, parliamentarians, companies, civil society groups, academia, the media, and international stakeholders.	<i>Compliant [3]</i>	<i>Inadequate progress</i>
B.2.4_3	The National MSG must ensure that the main findings of the FiTI Report contribute to public debates on how the fisheries sector is managed, enabling relevant stakeholders as well as citizens of FiTI implementing countries to demand reforms towards better governance of their marine fisheries.	<i>Meaningful progress [2]</i>	<i>Inadequate progress</i>
B.2.4_4	FiTI Reports must be published online under an open license.	<i>Inadequate progress [1]</i>	<i>Inadequate progress</i>
B.2.4_5	The National MSG must make users aware that information can be reused without prior consent.	<i>Inadequate progress [1]</i>	<i>Inadequate progress</i>
		<i>Meaningful progress [Avg. 2.0]</i>	<i>Inadequate progress</i>

Requirements for National Implementation Framework

B.3.1 Enabling Environment for Stakeholder participation

This requirement includes only one validation indicator. In general, the stakeholders considered that consultation processes and stakeholder participation in Seychelles have improved in recent years. The recent Mahé Plateau Management Plan or the Seychelles Marine Plan have been supported by wide consultation processes, although some of the stakeholders complained that although participation in the meetings for those initiatives were adequate, feedback given by the authorities about the information collected is null. Some stakeholders consider that their concerns were not adequately addressed (such as the lack of an adequate enforcement capacity in the country) and explanations about how the information collected from the participants is used (or it is not) (which is an important step of the decision-making process) was not given.

In the particular case of the FiTI, stakeholder participation within the National MSG was considered adequate by most of the stakeholders interviewed, indicating that although there may be disagreements among the MSG members regarding specific issues, they were free to speak, and

discussions were in general positive. It is unclear though if during the report compilation process, non-MSG members/the external public can provide any comments and if participation of external stakeholders is actively encouraged by the authorities. Therefore, **B.3.1 Enabling Environment for Stakeholder participation is scored as “Meaningful progress”**.

ID	Validation indicator	Baseline Assessment Report scoring	Independent Validator scoring
B.3.1_1	The government must maintain an enabling environment for business and civil society participation as specified in requirement A.2.	<i>Compliant [3]</i>	<i>Meaningful progress</i>
		<i>Compliant [3]</i>	<i>Meaningful progress</i>

B.3.2 Governance and Support

The FiTI Lead Ministry is the Department of Blue Economy (DBE), and the FiTI National Lead is Philippe Michaud. It has not changed during the validation process.

However, during the site visit, the independent validator was told, that although the initiative is strongly supported by the Minister himself, it is not a top priority within the Department of Blue Economy (DBE) (as the department covers a wide range of areas). Therefore, the resources for the FiTI are limited and the structure of the initiative was described as “*fragile*”.

Furthermore, the official function of the FiTI National Secretariat was assigned to the Seychelles Fishing Authority (SFA) but due to different circumstances, it was initially assumed by the DBE. Most of the Secretariat’ work is still carried out by personnel within the DBE, but no clear assignments or responsibilities have been given. A FiTI focal point has been recently appointed within the SFA, and SFA representatives have attended MSG meetings, but it is unclear to the consultant how the outputs (conclusions/recommendations) given by the National MSG meetings (included in the FiTI reports) are communicated to the government/SFA. At some point, the independent validator was told that in some cases was the compiler who provided the results of the meetings to the SFA. Therefore, it is unclear if the FiTI National Secretariat exists, and which is exactly the role of that secretariat in the entire FiTI communication process. Therefore, **B.3.2 Governance and Support can be only considered as “Inadequate progress” until those issues are clarified.**

ID	Validation indicator	Baseline Assessment Report scoring	Independent Validator scoring
B.3.2_1	The government must maintain a FiTI Lead Ministry and a FiTI National Lead as specified in requirement A.3.	<i>Compliant [3]</i>	<i>Meaningful progress</i>
B.3.2_2	Changes to the FiTI Lead Ministry or the FiTI National Lead must be made public, if applicable.	<i>Not applicable</i>	<i>Not applicable</i>
B.3.2_3	The National MSG must continuously maintain a properly authorised and resourced FiTI National Secretariat as specified in requirement A.5.	<i>Meaningful progress [2]</i>	<i>No progress</i>
		<i>Compliant [Avg. 2.5]</i>	<i>Inadequate progress</i>

B.3.3 Multi-Stakeholder Oversight

The FiTI is implemented in Seychelles through a National MSG, consisting of 12 representatives, equally assigned to the government (ruling party and opposition and two members from the Ministry of Fisheries and Blue Economy), business (industrial and small-scale fisheries, processing industry and a fishermen representative) and civil society stakeholder group (Transparency Seychelles, conservation CSO, Seychelles’ sport fishing sector and Seychelles’ youth).

Although the MSG ToRs were provided to the independent validator, it is not entirely clear how some members of the MSG were selected (government representatives, for example) or if other ministries should be included in the group (during the site visit, the independent validator visited the Ministry of Finance and although they are part of the EITI, they have not been integrated in the FiTI). In 2019, the FiTI MSG was enlarged, based on the demands of the civil society, but there is no information if there has been any subsequent interest from external actors to join the group and how it can be done (or if some of members could be replaced).

Other important issue that came up during the interviews was the lack of engagement of some members of the MSG during the meetings and the progressive lack of interest from other stakeholders, already commented in previous sections (for more information about attendance please refer to the country baseline assessment report). Some stakeholders indicated that for a better engagement in the group discussions, the National MSG meetings should be called and chaired/led by a representative of a different group (government, industry and civil society) each year (they considered that as one of the aims of the initiative is to try to make demands to the government to improve transparency, it did not make sense to have a representative of the government group leading the debates).

Finally, although there is no evidence to question the independence of the MSG members, the background of some members is wide (they have worked within the government, SFA, fishing industry, NGOs, etc) and although it can give them a wide knowledge about fisheries issues, it was difficult to ascertain that there was not a “*conflict of interest*” as being part of a specific MSG group (at some point during the interviews, there was difficulty to ascertain if their viewpoints came from one or another background or a mixed of them). Also, based on the email addresses used by the members of the National MSG, one of the civil society representatives seem to work within the ministry of fisheries, which does not seem to be appropriate, it is difficult to see how they can provide an independent view to the MSG.

Engagement in the discussions seems to be limited and interest in the initiative decreasing. Based on those issues listed, the validator considers that **B.3.3 Multi-Stakeholder Oversight** awards a “**Inadequate progress**” score until those issues are clarified.

ID	Validation indicator	Baseline Assessment Report scoring	Independent Validator scoring
3.3_1	The government must maintain a National MSG as specified in requirement A.4.	<i>Compliant [3]</i>	<i>Compliant</i>
B.3.3_2	Representatives from government, business and organised civil society must be appropriately qualified and fully, actively and effectively engaged in the FiTI.	<i>Meaningful progress [2]</i>	<i>Inadequate progress</i>
B.3.3_3	Representatives from organised civil society must be operationally, and in policy terms, independent from government and/or business.	<i>Compliant [3]</i>	<i>Inadequate progress</i>
B.3.3_4	Changes to the National MSG or to its Terms of Reference must be made public, if applicable.	<i>Compliant [3]</i>	<i>Meaningful progress</i>
		<i>Complaint [Avg. 2.7]</i>	<i>Inadequate progress</i>

B.3.4 Annual Workplan

The 2022 Workplan of Seychelles’ National Multi-Stakeholder Group of the Fisheries Transparency Initiative (FiTI) which documents the NMSG’s core objectives and activities to support an efficient,

effective and relevant implementation of the FiTI in Seychelles was provided to the validator. The 2022 Workplan summarises activities undertaken over the previous two reporting periods (2020 and 2021), indicates possible constraints in achieving the core objectives and list activities and outputs for 2022 based on 5 general objectives. This workplan needs to be presented and approved by the National MSG.

It is important to point out that the 2022 workplan was provided to the validator in August 2023, out of the period being evaluated in this report. However, it includes summaries for the 2020 and 2021 periods and sufficient explanation is given about the obstacles which prevented a workplan to be published in those years (COVID-19, etc), but it cannot be taken into consideration when scoring this requirement as it has not been approved yet. Therefore, **B.3.4 Annual Workplan is scored as “Inadequate progress”.**

ID	Validation indicator	Baseline Assessment Report Scoring	Independent Evaluator Scoring
B.3.4_1	The National MSG must provide an updated Workplan for each upcoming reporting period.	<i>Inadequate progress [1]</i>	<i>Inadequate progress</i>
B.3.4_2	Each Workplan must provide a summary of FiTI activities undertaken in the previous reporting period, including an assessment of the level of progress in achieving the objectives set out in the previous Workplan(s).	<i>Not collated</i>	<i>Not collated</i>
B.3.4_3	Each Workplan must outline objectives, constraints, activities and outputs in accordance with requirement A.6.74	<i>Not collated</i>	<i>Not collated</i>
B.3.4_4	Each Workplan must be approved by the National MSG two months prior to the upcoming reporting period.	<i>Not collated</i>	<i>Not collated</i>
		<i>Inadequate progress [Avg. 1.0]</i>	<i>Inadequate progress</i>

B.3.5 Impact Report

Not relevant (NA) as the first impact report is scheduled for 2023, 3 years after Seychelles became an FiTI Candidate country.

The assessment scores for each of the Transparency, Procedural and National Implementation Framework requirements – as set forth in section B.2 of the FiTI Standard – are shown in the Validation Scorecard in Annex 1.

Assessment of breaches of principles and spirit of the FiTI

No breaches of principle and spirit of the FiTI were identified during the stakeholder consultation phase. During the desk base study and site visit, the government of Seychelles (Ministry of fisheries, SFA) did not show signs of wilfully withholding information the FiTI Standard requests to be published. All the validator requests were attended, including access to private agreements, FiTI workplans, etc. and clear explanations were given to the independent validator in cases where information was not published, e.g., by acknowledging administrative constraints, lack of data, etc.

The initiative shows a strong support from government, fisheries agency and other government related stakeholders.

Key outcomes of stakeholder consultations

As seen in the validation scorecard which summarises the previous section (Verification of the assessment of individual requirements), of the 12 transparency requirements, three (B.1.1 Public Registry of National Fisheries Laws, Regulations and Official Policy Documents, B.1.2 Fisheries Tenure Arrangements and B.1.4 The State of Fisheries Resources) are scored a “*Compliant*”, seven (B.1.3 Foreign Fishing Access Agreements, B.1.5 Large-Scale Fisheries, B.1.6 Small-Scale Fisheries, B.1.7 Post-Harvest Sector and Fish Trade, B.1.8 Fisheries Law Enforcement, B.1.9 Labour Standards and B.1.12 Beneficial Ownership) as “*Meaningful progress*” and two (B.1.10 Fisheries Subsidies, and B.1.11 Official Development Assistance) as “*Inadequate progress*”.

In the case of the Procedural requirements, for B.2.1 Reporting Requirements, B.2.2 Reporting Deadlines and Periods and B.2.3 Reporting a “*Compliant*” score is awarded, whereas B.2.4 Report Dissemination and Public Debate scores as “*Inadequate progress*”.

It is within the Requirements for National Implementation Framework section, where the performance of the initiative gets lower scores. Only one requirement B.3.1 Enabling Environment for Stakeholder participation scores as “*Meaningful progress*” whereas three requirements B.3.2 Governance and Support, B.3.3 Multi-Stakeholder Oversight and B.3.4 Annual Workplan are scored as “*Inadequate progress*”.

Broadly speaking, the initiative seems to be widely supported by the stakeholders consulted, including fisheries ministry of fisheries, fisheries agency and other stakeholders. The ministry of fisheries and the fisheries agency are making efforts to address the recommendation given by the National MSG in the FiTI reports and it is broadly considered that the initiative has helped to make the fisheries related information more available to the general public, in line with the FiTI objectives.

A number of specific problems with each of the requirements have been pointed out in the previous section. However, it is important to emphasize the weakest points here, that came up during the interviews were the progressive lack of interest and commitment of the members of the National MSG in the initiative and during the meetings. Dissemination of the information contained in the reports is reaching key national stakeholders, but reactions to that information seems to be limited to specific individuals already engaged in the fishing industry or interested in marine conservation issues. Few public debate sessions have been organised as a result of those publications, but most of the sessions organised for the dissemination of the results were cancelled due to certain restrictions from the COVID-19 pandemic.

There are a number of factors which are considered could contribute to this lack of interest. For example, the baseline assessment report prepared by the FiTI International Secretariat and the 2022 workplan indicate that there is a weak media/civil society landscape in the country, and a few groups with the necessary leadership and focus to actually perform oversight functions, raise issues of national interest in the public sphere or hold decision makers accountable. However, these same civil society (or at least some associations/groups) have been very vociferous and have mobilized to fight, for example, against unsustainable tourism developments. Therefore, it is unclear whether the lack of involvement in the FiTI, is mainly due to a lack of interest in fisheries management, or due to a lack of adequate capacity and support to participate meaningfully in the FiTI (e.g., inadequate communication and dissemination plan, insufficient advocacy, lack of resources, time, etc.).

Most of the stakeholders interviewed by the independent validator consider that the FiTI needs to clarify its main purpose/objectives and focus not only on the outcomes but also the entire fisheries management processes. They also indicated that the FiTI needs to adopt a more active role and demand changes in how fisheries management decisions are being taken. The impact of the initiative depends on how information is made available but also in how it is used. But if no organization is making demands, it is unclear which is the entire purpose of the initiative. Transparency should be better integrated in the institutions and could be used as a bargain tool for improvement (for example, to sign better agreements with foreign parties).

Stakeholders considered that the initiative needs to show it brings positive change to make it more relevant and improve engagement among stakeholders.

Recommendation for the overall compliance designation of Seychelles

In accordance with section D.2.2 of the FiTI Standard, the independent validator must provide a recommendation for the overall compliance designation in this final validation report

As indicated in the previous section, the 12 transparency requirements evaluated get an “average” score of “Meaningful progress” whereas three out of four of the procedural requirements are scored as “compliant” (B.2.4 scores as “Inadequate progress”). However, is within the Requirements for National Implementation Framework section, where the performance of the initiative gets the worst scores, with three of them (B.3.2, B.3.3 and B.3.4) scoring as “Inadequate progress”.

It needs to be emphasized that the main aim of the initiative is widely supported by the stakeholders consulted; and the ministry of fisheries and in particular the Seychelles Fishing Authority have been responsive and have done efforts to address the recommendations given by the National MSG. However, the independent validator was tasked with consulting with the most relevant stakeholders (inside and outside the National MSG), and it is important to report some of the stakeholder’s viewpoints here. The independent validator was told that the structure of the initiative in the country was “*fragile*”, that the initiative was not considered a “*top priority*” within the government, “*not even one of the tops priorities*”. Also, that “*the government was not serious about the initiative*” or that “*they should be taken it more seriously*”. That right now it was “*a box ticking exercise*” and “*a rubber-stamp initiative*”. Stakeholders also indicated that the “*Initiative needed to be made more relevant*” and that FiTi was “*too afraid of pushing too hard*” and be “*kick out*” from the country. That the only use of the FiTI annual reports was to “*put them in a drawer*” and the initiative was not bringing “*any relevant changes in how the decision-making is made*” and that “*they did not see any progress*”. It is important to emphasize that these viewpoints are not coming from a single person but from several stakeholders representing the different groups included in the National MSG (government, civil society and industry).

For providing a recommendation, the independent validator has been told to consider the special circumstances of the country, that two years is a very short period to achieve relevant changes, and to be positive on the validation. However, although I can agree with that, the stakeholder’s viewpoints paint a grim picture. Interest in the initiative and expectations about the benefits it can bring to the country seem to be at an all-time low among stakeholders and re-engaging them to participate in the initiative seems to be a herculean task.

A number of interesting summary reports and statistics have been published and are now available as a result of the initiative, but dissemination of the progresses seems to be limited and the new available information has not led to any public debate or meaningful change in the decision-making processes.

The rationale/theory of change behind FiTI, although not available anywhere, seems to be quite simple, more information leads to public debates and better participation resulting in improved fisheries governance. On the FiTI’s website, the key principles for increasing transparency and participation under the FiTI are listed as follows: “*multi-stakeholder participation*”, “*progressive improvement*”, “*transparency in the public domain*” and “*public debate*”. However, the dissemination of the initiative in Seychelles is limited and public debate is not encouraged, and even if several transparency requirements have been (partially) met, the stakeholders interviewed consider that the initiative is not bringing improvements in how decisions are made.

In summary, there are two options that have been considered by the independent validator, option 1, there is a mismatch between the goals and promises of the initiative and the expectations of the stakeholders; or option 2, the initiative is not reaching its objectives and is not bringing any relevant improvement in fisheries governance in the country. In both cases, there is still a long way to go.

The independent validator therefore considers that the Seychelles Fisheries Transparency Initiative should be rated as “**inadequate progress**”. First of all, the FiTI should clarify its objectives and main

purpose and be clear about the scope of the initiative. Anyway, the Seychellois government should take a more proactive approach, adopt transparency at all the stages of the management process, promote the participation of stakeholders in the decision-making process and bring positive change, leading the way to other countries interested in implementing the initiative. Suggested corrective actions to strengthen Seychelles' compliance with the FiTI Standard are given below.

Efforts that go beyond FiTI requirements

A number of efforts that go beyond FiTI requirements were identified by the FiTI International secretariat during the preparation of the Baseline Assessment Report. These are related to specific information published for *B.1.2 Fisheries Tenure Arrangements* (SFA published detailed licence information regarding the sea cucumber fishery), *B.1.6 Small-Scale Fisheries* (SFA published payment information from its small-scale fisheries on a per vessel basis), *B.1.10 Fisheries Subsidies* (information on ice subsidies given to the small-scale fishing sector was compiled by the 2020 FiTI Report), *B.2.2 Reporting Deadlines and Periods* (all 12 transparency requirements were addressed in each report), and *B.2.4 Report Dissemination and Public Debate* (several supporting documents have also been translated into Creole to make it more accessible). No other efforts exceeding FiTI requirements were identified during the stakeholder consultation phase by the independent validator.

Suggested corrective actions to strengthen Seychelles' compliance with the FiTI Standard

As part of the initial baseline assessment of Seychelles' compliance with the FiTI Standard, the FiTI International Secretariat included a number of recommendations for specific transparency requirements. These recommendations do not need to be repeated here. So, please see the baseline assessment report for more information.

There is a number of corrective actions which it is considered should be emphasized though:

- As indicated above, there is still no clear assignment of the FiTI National Secretariat. It is unclear if the role is assumed by the Department of Blue Economy of the Seychelles Fisheries Agency. It is recommended that the organisational and personnel responsibility for running the FiTI National Secretariat is clearly defined between these organizations. Functions, roles and responsibilities need to be clearly defined and assigned.
- Some issues have been identified with the National MSG. It is considered that the group should meet more regularly to deal with the main issues of interest not only when a FiTI report needs to be prepared (although the consultant was told that meetings are conducted every two or three months, the published minutes do not seem to indicate so). The responsibility of convening the meetings and led the debates should rotate between the different stakeholder groups (government, industry, civil society). Other recommendations suggested by the stakeholders were to renew some National MSG members (or introduce rotations) and include new organizations in the group (for example the Ministry of Finance, other NGOs not represented in the group, etc.).
- The FiTI advocacy campaign needs to be strengthened. There is currently very little communication or advocacy from civil society organisations on issues related to the FiTI. Objectives and target audiences must be defined and innovative ways of communicating the information included in the FiTI reports and encourage public debate must be explored.
- The FiTI should consider developing a capacity building program to strengthen organizations or national institutions for transparency-related activities.
- Explore synergies with other transparency initiatives in the country, such as the Extractive Industries Transparency Initiative (EITI), and also international organizations working in transparency or management organizations (RFMOs, etc) to strengthen the impact of the initiative regional/international level.

Suggested recommendations to strengthen the impact of transparency on sustainable marine fisheries in Seychelles

A number of corrective actions and recommendation for improvement have been given in the previous section and do not need to be repeated here.

Very much needs to be done to strengthen the impact of transparency on sustainable marine fisheries in Seychelles. As indicated previously, most of the stakeholders interviewed considered that the FiTI (the national or international secretariat) needs to take a more active role or approach in order to strengthen decision-making processes and improve fisheries management (based on transparency).

Several stakeholders indicated that the Seychelles should lead the way at the regional level and make efforts to reduce catches (for example, for overfished species, such as yellowfin tuna) and make other countries to follow them.

Areas of particular attention for the FiTI International Board

No specific problems have been identified during the stakeholder consultation phase and the preparation of this report. There is couple of issues, I would like to highlight:

- FiTI does not set milestones or deadlines to achieve specific requirements, which is understandable considering that the initiative can be implemented in countries with different realities entering the initiative from different starting points. However, this circumstance makes difficult to track progress against the requirements in the standards, as no clear targets/deadlines are set. This point was highlighted by some of the external stakeholders interviewed. Although, it is true that the recommendations/conditions set by the MSG include milestones and these can be used to track implementation progress through the annual FiTI Report.
- Some of the validation indicators are defined quite generally and are subject to interpretation, which makes difficult to assess to what extent a particular indicator is fulfilled (for example if minor problems with the data published persist). In this case, some of the scores given in the baseline assessment report prepared by the FiTI international secretariat were considered too high by the independent validator. No training on the standard was given to the independent validator before the site visit (despite it was indicated in the contract).
- As a final comment, I would say that having the FiTI international secretariat based in one of the countries implementing the initiative does not seem to be appropriate. At some point during the interviews, some of the stakeholders interviewed did not know what the role of the national secretariat was or if it was necessary to have one considering that the international secretariat was already based there in Seychelles.

Annex I: Validation Scorecard

Validation Scorecard						
FiTI requirements	Level of compliance					Direction of progress
	Compliant	Meaningful progress	Inadequate progress	No progress	Exceeding (if applicable)	Compared to previous validation(s): No change – worse – better (choose one)
Transparency requirements						
B.1.1 Public Registry of National Fisheries Laws, Regulations and Official Policy Documents						
B.1.2 Fisheries Tenure Arrangements						
B.1.3 Foreign Fishing Access Agreements						
B.1.4 The State of Fisheries Resources						
B.1.5 Large-Scale Fisheries						
B.1.6 Small-Scale Fisheries						
B.1.7 Post-Harvest Sector and Fish Trade						
B.1.8 Fisheries Law Enforcement						
B.1.9 Labour Standards						
B.1.10 Fisheries Subsidies						
B.1.11 Official Development Assistance						
B.1.12 Beneficial Ownership						
Procedural requirements for FiTI Reports						
B.2.1 Reporting Requirements						
B.2.2 Reporting Deadlines and Periods						
B.2.3 Reporting Process						
B.2.4 Report Dissemination and Public Debate						
Requirements for National Implementation Framework						
B.3.1 Enabling Environment for Stakeholder participation						
B.3.2 Governance and Support						
B.3.3 Multi-Stakeholder Oversight						
B.3.4 Annual Workplan						
B.3.5 Impact Report				NA		
Overall compliance designation (<i>Independent Validators and FiTI International Board only</i>)						
Efforts that go beyond the scope of the FiTI Standard (optional)						

Anex II: List of stakeholders interviewed

List of stakeholders interviewed by the independent validator during the site visit conducted in Seychelles between May 30 and June 12. In blue, the stakeholders who are member of the National MSG.

Names	Affiliation	Date/details	Subjects discussed
Sven Biermann Will May	FiTI International secretariat	01/06/2022 9:30 FiTI international Secretariat office - Providence area	Introductory meeting: <ul style="list-style-type: none"> Objectives and scope of the validation (objectives, timeframes, deadlines, etc.). Issues to explore further (unpublished FFAA, lack of information on subsidies, lack of information from the Seychelles' industrial longline fishery, lack of information on major offences, etc.). Relevant stakeholders (contact details). Questions/doubts, etc.
Mr Philippe Michaud Fatime Kante	Lead consultant FiTI National MSG member FiTI National Secretariat coordinator	01/06/2022 – 02/06/2022 9:30 Ministry of fisheries - Victoria	Introductory and working meetings: <ul style="list-style-type: none"> Role of the FiTI national secretariat. How the MSG meetings work (decisions, engagement, etc.). Strengths and weaknesses of the FiTI (lack of commitment from a member, etc.). Recommendations for improvement (rotation in the participation of the national MSG members, make it a priority, more regular meetings, spread the word from the representatives to their groups, make the initiative more relevant, etc.). Unpublished FFAA agreements for the Taiwanese TTA and emails sent to those companies provided to the consultant. Discussion on the new agreements.
Mr Jean-Francois Ferrari	Minister of Fisheries / Government	02/06/2022 9:30 Ministry of Fisheries – Victoria	<ul style="list-style-type: none"> Support by the Ministry of the fisheries. Structure of the FiTI in the country. How to make FiTI more relevant to improve the impact of the initiative Impact at the regional level. Open government organization Other issues (Capacity building, challenges in data collection, etc.).
Dr Nirmal Shah	Nature Seychelles / Civil Society	03/06/2022 9:30	<ul style="list-style-type: none"> Purpose of the initiative and role of the FiTI international secretariat within it. The Access to Information Act (2018).

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		The Sanctuary at Roche Caiman	<ul style="list-style-type: none"> Processes and outcomes of the initiative. National MSG structure and members. Consultation processes in Seychelles (e.g: Mahe plateau management plan). Cost-effectivity of the entire initiative.
Dr Jude Bijoux	Consultant – Compiler FiTI reports	03/06/2022 15.30 ChatterBox café - Eden Island Plaza	<ul style="list-style-type: none"> Compilation and preparation of the reports (stakeholder/government/SFA consultation, FiTI international Secretariat cooperation, structure, etc.) Presentation of the results and participation in the stakeholder meetings (attendance, preparation of the recommendations, feedback). he considers it was good but politicians and small-scale fishermen did not attend them) Regularity of the MSG meetings, advocacy, etc. Recommendation to improve the initiative. Integration with other areas/initiatives (Tourism, EiTI, etc.)
Mr. Keith Andre	Fishermen Boat Owner's Association (FBOA) MSG member – Small-scale Industry	06/06/2022 8.30 Artisanal small-scale landing site – Victoria	<ul style="list-style-type: none"> Role of the FBOA. Participation in the MSG meetings. Stakeholder engagement in other initiative Specific issues (subsidies, enforcement, etc) Regional impact of the initiative and the role of the FBOA at the regional level. Recommendations for improvement.
Dr Jan Robinson	SWIOFish3 Project Manager - Independent	06/06/2022 1.30 SWIOfish office – Providence area	<ul style="list-style-type: none"> Involvement of the SWIOfish with the FiTI. Role of different agencies in the country (Ministry/SFA, etc). Information on key stakeholders and informants Stakeholder engagement in other initiatives (e.g: Mahe plateau management plan) Regional impact of the initiative. Recommendations for improvement, how to make it more relevant.
Mrs Elizabeth Agathine	Principal Secretary of Economic Planning Department (within Ministry of Finance) / Government	07/06/2022 9.00 Liberty house -Victoria	<ul style="list-style-type: none"> Structure of the Ministry of Finance and her role within it. Knowledge about the FiTI Information on fisheries subsidies The EITI initiative, participation and how it interacts with the FiTI. How to improve the initiative (civil society involvement, advocacy, communication, etc)
Mr Berty Hoarau	Executive member and treasurer FBOA	07/06/2022 10.30	<ul style="list-style-type: none"> Role within the FBOA and the small-scale sector in Seychelles. What is transparency in fisheries and how much should be published

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		Artisanal small-scale landing site – Victoria	<ul style="list-style-type: none"> • Support of the FiTI, strengths and weaknesses (discrimination against other less transparent countries, etc). • Regional impact of the initiative (Madagascar, Mauritius, etc). • Stakeholder engagement in other initiatives in the country and a regional level. • Participation in other processes (consultation processes, IOTC and EU meetings, etc) • Other specific issues (management plans, lack of transparency in other IO countries, problems with private agreements, etc). • Recommendations for improvement (tools or mechanisms to take action).
IOTC data group Fabio Fiorellato Emmanuel Chassot Lucia Pierre Cynthia Fernandez Diaz	IOTC Secretariat	07/06/2022 11.30 IOTC Secretariat – Providence area	<ul style="list-style-type: none"> • The IOTC role, CMMs, information reporting, etc. • Knowledge about the FiTI (FiTI reports, etc) and the benefits it may bring to fisheries in the country. • Possibilities for interaction with the IOTC work. • Specific issues in Seychelles fisheries (quality on data, problem with longline data, etc.) • Other specific issues (management plans, lack of transparency in other IO countries, problems with private agreements, etc). • Recommendations for improvement and cooperation.
Mr Johnny Louys	Monitoring Control and Surveillance Manager - SFA	08/06/2022 8.00 Ensemble building - SFA headquarters - Victoria	<ul style="list-style-type: none"> • Role: policy, operational side, control of the different fleets. • MSG composition (SFA attendance) • Interactions with the FiTI and distribution of the FiTI reports. • Support of the initiative, strengths (better data collection and reporting, transparency, etc). • Controversial (beneficial ownership) and data issues (logbook return, major offences). • Data collection and monitoring in Seychelles fisheries (port inspections, EMS, ARS, small-scale tracking units, etc.) • Policies and decision making (always based on data). • Other transparency initiatives (Global Fishing Watch, etc.) • Recommendations for improvement.
Mr David Kentley	CEO Sea harvest	08/06/2022 10.30	<ul style="list-style-type: none"> • Role in the industry, role in the MSG.

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	MSG member - Industry	Sea Harvest office – Victoria port	<ul style="list-style-type: none"> • Strengths (progresses, cross-sector group, develop dialogue, used to call for having a meeting with the SFA) and weaknesses of the initiative (data transparency needs to be limited for some sensible data). • Participation in the MSG meetings (Civil society, etc). • Description of the main fleets in the country (purse-seine, industrial fleet and semi-industrial longliners). • Role of Seychelles in the IO (should lead catch reduction schemes and NGOs should ban countries which do not comply). • Information provided by the industry to the SFA (issues). • Other issues (IOTC, yellowfin tuna recovery, P&L catch issues, fish quality, quality in other countries, etc.) • Recommendations for improving the initiative.
Mr Cyril Bonnelame	Transparency Initiatives Seychelles – Ex CEO SFA MSG member – Civil society	08/06/2022 13.30 Oceana office – Providence port	<ul style="list-style-type: none"> • Role of the interviewed (CEO industry, ex-CEO of the SFA, member of the Seychelles transparency, and member of the national MSG). • Responsiveness of the SFA to the MSG demands and recommendations (proactive). • Frequency and participation in the MSG meetings. • Consultation processes in the country and the role of civil society. • Recommendations for improvement (communication, advocacy, the initiative needs to grow up locally and put it in value, promote transparency at different levels).
Miss Fatime Kante	FiTI National Secretariat coordinator	09/06/2022 8:00	<ul style="list-style-type: none"> • Role within the Ministry and the FiTI secretariat. • National MSG meetings (regularity, organization, participation, etc). • Workplan (activities, limitations, etc) • Advocacy campaigns (tours, flyers, workshops). • Structure and commitment of the SFA with the initiative. • Issues with engagement and participation in the initiative (the MSG-SFA, renewal of members, etc). • Recommendation for improvement and make it more relevant.
Mr Kenneth Racombo	Principal Secretary of Blue Economy Department / Government	09/06/2022 9.00	<ul style="list-style-type: none"> • Role and background of the interviewed. • Structure of the Blue Economy Department (tourism, etc). • The role of fisheries in the country and the FiTI within the department (personnel, etc).

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			<ul style="list-style-type: none"> • Strengths and weaknesses of the initiative. • Recommendation for improvement (improve visibility, advocacy, etc).
Mrs Helena Sims	Project Manager of Seychelles Marine Spatial Plan Initiative, the Nature Conservancy / Civil Society	09/06/2022 10.30 Seychelles Marine Spatial Plan Initiative – Eden Island	<ul style="list-style-type: none"> • Role, background, knowledge about the initiative. • The Seychelles marine spatial plan: objectives, process, interactions with FiTI; • Consultation processes and decision-making processes in the country. • Expectations, weaknesses of the initiative. • Other information about the SMSP (maps, etc).
Mr. Selwyn Edmond	Industrial fleet – Purse seine MSG member – Industry	09/06/2022 2:30 Seaward Co Ltd office – Victoria port	<ul style="list-style-type: none"> • Role of the interviewed • Setting up, structure and functioning of the MSG, participation, expectations, feedback, etc. • Advocacy within and outside the organization which he represents (feedback to the reports). • Strengths (good initiative) and weaknesses (recommendations should be bidding for the authorities). • Recommendations for improvement.
Mr Grant Heyer	Sport fishing – CEPS MSG member – Civil society	09/06/2022 17:30 Yacht club – Victoria	<ul style="list-style-type: none"> • Role of the interviewed (sport fishing - CEPS). • Setting up, structure and functioning of the MSG, interest, participation, expectations, role of the group and the compiler, etc. • Strengths (SFA responsiveness) and weaknesses (engagement, participation, etc) of the FiTI; • Consultation and decision-making processes in the country (SMSP), weaknesses. • Campaigning and advocacy within and outside the organization. • Recommendations for improvement. • Other issues (sport fishing, conservation, fisheries management, industrial fleet).
Mrs. Marie-Thérèse Purvis	Environmental Conservation – CEPS MSG member – Civil society	10/06/2022 10:45 Anse la Mouche – West coast	<ul style="list-style-type: none"> • Role of the interviewed (Conservation – CEPS). • The role of CEPS. • Structure and functioning of the MSG, participation, expectations, etc. • Strengths and weaknesses of the FiTI.

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			<ul style="list-style-type: none"> • Consultation processes and participation/engagement of the civil society in the country. • Campaigning and advocacy. • Recommendations for improvement.
Mr Peter Purvis	Industry MSG member – Civil society	11/06/2022 17:00 Bel Ombre – North coast	<ul style="list-style-type: none"> • Informal/very short exchange of views about the initiative • Role of the interviewed. • Supporting of the initiative by the small-scale and industrial fleet. • Problems inside the small-scale fleet's organization/s.
Mr Joseph Rodolph Payne	Industry	24/06/2022 9:00 (CET) Online meeting	<ul style="list-style-type: none"> • Role (Consultant, industry (fish processing, fisheries, aquaculture), ex-CEO SFA, ex-IOTC) • Knowledge about the initiative, expectations, etc. • Strengths (good initiative) and weaknesses (it is not sparking debate, no milestones). • Limits to transparency from the industry point of view. • Capacity building program.
Holly	International seafood Sustainability Foundation (ISSF)	27/06/2022 19.30 (CET) Online meeting	<ul style="list-style-type: none"> • Role of the interviewed • Knowledge and interest in the initiative from the ISSF/international point of view • Strengths and weaknesses, interest in participating in the initiative (international board, etc). • Recommendations for improvement.
Ricardo Luzio	General Manager at Indian Ocean Tuna (IOT) canning factory / Business	Contacted by email	<ul style="list-style-type: none"> • Declined to participate indicating that the FiTI only affected to the government

References

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