



Seychelles' 1st Report to the Fisheries Transparency Initiative (FiTI)

Calendar year: 2019

**Report by the FiTI National Multi-stakeholder
Group (MSG) Seychelles**

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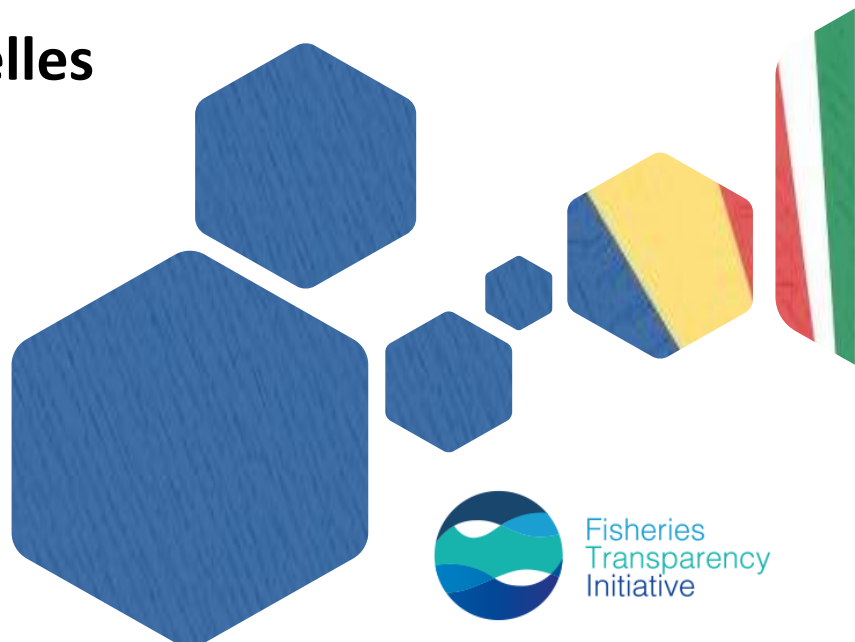


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This report was prepared by **Mr Jude Bijoux** during October 2020 – March 2021. Mr Bijoux was appointed by Seychelles’ FiTI National Multi-Stakeholder Group as the Report Compiler for the 2019 FiTI reporting process.

The report was reviewed and approved by **Seychelles’ FiTI National Multi-Stakeholder Group** on 31 March 2021.

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Abbreviations

BSFC	British/Seychelles Fisheries Commission
CBS	Central Bank of Seychelles
CEO	Chief Executive Officer
COA	Certificate of Authorisation
EEZ	Exclusive Economic Zone
EU	European Union
FAO	Food and Agriculture Organisation of the United Nations
FCP	Fisheries Comprehensive Plan
FINSS	Financial SaaS Solutions
FITI	Fisheries Transparency Initiative
FIU	Financial Intelligence Unit
GDP	Gross Domestic Product
IOT	Indian Ocean Tuna Limited
IOTC	Indian Ocean Tuna Commission
MCS	Monitoring, Control and Surveillance
MESA	Ministry of Employment and Social Affairs
MFBE	Ministry of Fisheries and the Blue Economy
MSG	Multi-Stakeholder Group
MSY	Maximum Sustainable Yield

Mt	Metric tonnes
NAS	National Assembly of Seychelles
NBS	National Bureau of Statistics
NRT	Net registered tonnage
ODA	Official Development Assistance
OECD	Organisation for Economic Co-operation and Development
POC	Province of China
SCR	Seychellois Rupee
SEYLII	Seychelles Legal Information Institute
SFA	Seychelles Fishing Authority
TAC	Total Allowable Catch
UNDP	United Nations Development Programme
VAT	Value Added Tax

Foreword

As the Chair of the Seychelles FiTI National Multi-Stakeholder Group (MSG), I am very pleased to present this first report to the Fisheries Transparency Initiative (FiTI), which is the first of its kind – not only for Seychelles, but globally.



Compiling this FiTI Report in a truly inclusive spirit during a global pandemic was not an easy task. In addition to the administrative challenges that this pandemic brought upon all of us, including the restrictions of face-to-face meetings between stakeholders from government, business and civil society, it was the first time that the national authorities are assessed against the FiTI Standard, indicating which information on fisheries should be published by the government of Seychelles. This required not only a mind shift towards ‘open government’, but also intense interactions between the Report Compiler, Dr Jude Bijoux; the authorities; the members of the FiTI National Multi-Stakeholder Group, and the FiTI International Secretariat.

Moreover, Seychelles committed to conduct the assessment against the full set of the 12 transparency requirements of the FiTI Standard, instead of only the minimum first six requirements. This ambitious exercise is a clear testament to the importance Seychelles places on transparent marine fisheries.

When the government of Seychelles joined the Open Government Partnership Initiative (OGP) in 2018, the adherence to the FiTI was one of the country’s four commitments. The enactment of one of these commitments, the Access to Information Act, in 2018, started the shift of the paradigm of governance from one of secrecy to one of transparency. This is helping to create an enabling environment for more democratic participation in affairs that concern us all.

It must however be said that there still remains much to be done to fully engage all stakeholders in questioning the way the fisheries sector is managed, assessed, monitored and valued. This concerns not only to stop the continuing practice where the fisheries sector is taken for granted, but also to ensure that it is consistent with our Blue Economy principles. Fisheries must be environmentally sustainable, economically viable and inclusive through strengthening national partnerships between, industry, civil society and government. And in order to pursue informed discussions, the public availability of trusted information is an essential first step.

This first FiTI Report process highlighted several areas where there are serious weaknesses in the availability of information and showed that even when information exists, it is not always easily accessible to the public, and at times, is simply inaccessible.

There were also instances where confidentiality and other legal issues prevented the publication of basis information. In these cases, the National MSG has recommended that discussions are started with the objective of improving transparency without at the same time compromising sensitive commercial interests.

The publication of this report comes at a time of great difficulty for the economy of Seychelles. Like many other tourism-dependent small island states, our country is now embarking on the long journey towards economic recovery. Marine fisheries, the second largest pillar of our economy, must be sustainably managed to ensure it not only contributes the maximum now, but that it also has the ability to continue contributing to shared prosperity well into the future.

I am therefore convinced this report will be a milestone in our country's efforts towards a prosperous, well-managed and socially equitable fisheries sector. It is expected that important changes will result from this report. In fact, some have already started since the exercise was initiated. Most notably, some foreign fishing access agreements, fisheries research studies, licensing data etc. have now been published and can be accessed without any restrictions or costs. The changes that are coming will be necessary as they will identify how to create streamlined operating procedures that will prevent duplication, maximise use of resources and promote the inclusiveness of all partners into the process.

It is hoped that all bona fide stakeholders (Seychellois as well as our international partners) will realise that the prosperity and development of the fisheries sector depends on the active participation of all. For this to happen, it is essential that the information is available, accessible and complete. I am confident that this report will increase the appreciation of the importance of our fisheries sector, and also highlight what needs to be done to ensure that fisheries benefits us all.

This report is therefore clearly not designed for the fisheries experts within government, industry and civil society. Instead, it is meant for the people of Seychelles. We all need to assume ownership of our common resource. I dare to hope that a transparent fisheries sector, backed by a smooth data sharing process and regular informed public debates, is within the grasp of Seychelles.

Philippe Michaud

Ministry of Fisheries and the Blue Economy

Chair of the FiTI National Multi-Stakeholder Group Seychelles

1) Summary

Seychelles, an island group in the western Indian Ocean, comprises of 115 islands spread over an Exclusive Economic Zone (EEZ) of 1.37 million km². Despite having a land mass of just 455 km², Seychelles is a large oceanic state, and a major player in the global tuna industry, with Port Victoria one of the busiest industrial fishing ports in the Western Indian Ocean. Seychelles is heavily reliant on its two main pillars of the economy: tourism and fisheries.

In view that marine fisheries is such a key contributor to the social, economic and cultural fabric of Seychelles, the fisheries 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).

There is a widely shared understanding of the need to achieve sustainably managed marine fisheries. But coastal states, like Seychelles, face a complex challenge: ensuring that fishing and fish trade contribute to income, employment, food and nutrition security, while also conserving marine biodiversity for future generations.

While there are many aspects to achieve sustainable fisheries, the public availability of information is essential. Transparency does not only contribute to improved decision-making by public authorities, it can also highlight underlying factors of unsustainable fisheries. National authorities, private fishing companies, local fishing communities, investors, retailers and partner countries engaged in fishing agreements stand to benefit from increased transparency. Promoting these positive features of fisheries lies at the heart of the Fisheries Transparency Initiative (FiTI).



The Fisheries Transparency Initiative (FiTI) is a global multi-stakeholder partnership that defines for the first time the information that national authorities must publish on the marine fisheries sector.

By making fisheries management more transparent and inclusive, the FiTI promotes informed public debates on fisheries policies and supports the long-term contribution of the sector to national economies and the well-being of citizens and businesses that depend on a healthy marine environment.

Seychelles has been collaborating with the FiTI since 2015. In fact, 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).

This is the first report of Seychelles to the FiTI, covering information relevant for the calendar year 2019.



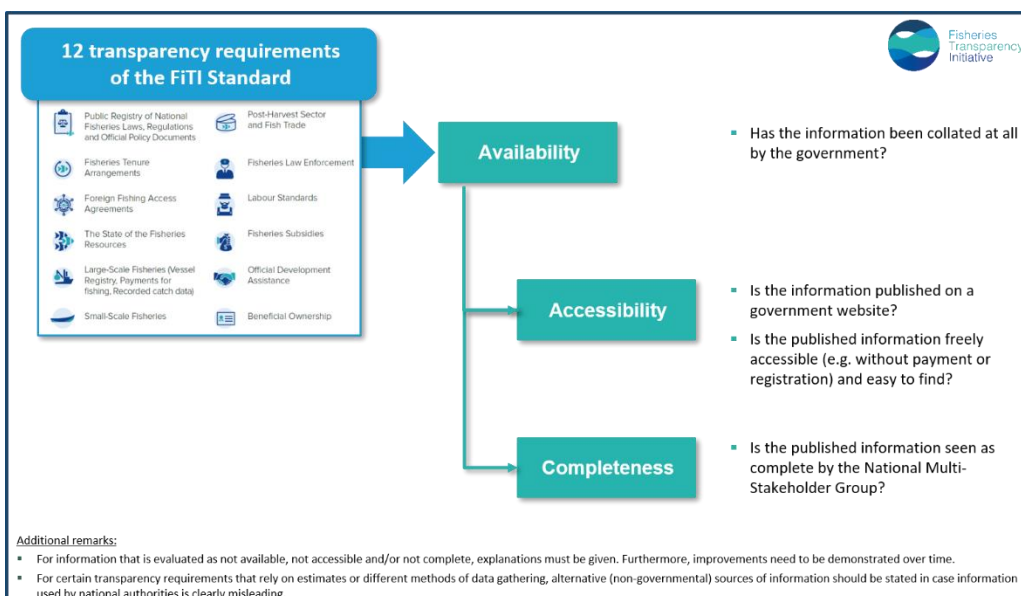
The purpose of this report is threefold:

1

To SUMMARISE KEY STATUS INFORMATION on Seychelles' fisheries sector to increase public understanding and appreciation of Seychelles' fisheries sector.

2

To ASSESS SEYCHELLES' LEVEL OF COMPLIANCE against the 12 transparency requirements of the FiTI Standard.¹



3

To PROVIDE RECOMMENDATIONS to Seychelles' national authorities on how the publication of information in the public domain, e.g. on government websites, can be further improved.

¹ The **FiTI Standard** is an internationally recognised transparency framework that defines for the first time what information on fisheries should be published online by the national authorities. The FiTI Standard was developed over the course of a 2-year global consultation process with representatives from fishing nations, industrial and artisanal fishing, civil society and intergovernmental organisations.

The report has been produced by **Seychelles' National Multi-Stakeholder Group (MSG)**, a group comprising of 12 members, equally representing government, business and civil society. Together, this group is responsible for how the FiTI is implemented in Seychelles.

Government representatives	Business representatives	Civil society representatives
Mr Roy Clarisse	Mr Keith Andre	Mr Cyril Bonnelame
Honorable Chantal Ghislain	Mr David Bentley	Ms Gabriella Gonthier
Mr Philippe Michaud ²	Mr Selwyn Edmond	Mr Grant Heyer
Honorable Philip Monthy	Mr Darrell Green	Dr Marie-Thérèse Purvis

“ We, the FiTI National Multi-Stakeholder Group of Seychelles, seek to stimulate informed public debates on how the fisheries sector is managed in Seychelles. We therefore encourage all bona fide stakeholders that appreciate the enormous value and importance of marine fisheries in our country – the citizens of Seychelles, civil society organisations, media, academia and our national and international business and development partners – to engage in an active dialogue based on this report. ”

² Chair of the National Multi-Stakeholder Group

In order to facilitate the understanding and usage of this report, the National Multi-Stakeholder Group seeks to emphasise the following core characteristics:

- ***The FiTI does not expect 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. Recommending and monitoring such improvements will be a core responsibility of Seychelles' National MSG.
- ***Public disclosure of information cannot be directly equated to actual progress towards sustainable management of fisheries.*** In other words, poor levels of transparency may not be a sign of wrongdoing, but they rather highlight a potential opportunity to enhance disclosure to stakeholders. Likewise, high levels of public availability of information illustrates strong disclosure systems, but this may not reflect operational and implementation success regarding the sustainability of marine fisheries. *Consequently, Seychelles' first FiTI Report is not an end in itself. Instead, it is an opportunity to take stock of current disclosure practices against an internationally recognised transparency framework with a view to starting a conversation with all relevant stakeholders in Seychelles' fisheries sector.* In the future, such a report will be published on an annual basis, including comparisons with previous years.
- ***This report does not highlight mistakes or weaknesses in decision-making, nor bad fishing practices.*** It does, however, offer an important means to raise levels of openness and public access to information which can support all stakeholders in maintaining or achieving robust democratic governance and accountability within Seychelles' fisheries sector.
- ***This report does not substitute or duplicate existing efforts by national authorities, such as Seychelles Fishing Authority's Annual Report or its fisheries statistics.*** Instead, the FiTI emphasises the need for national authorities to develop and strengthen their own systems for collating and publishing information online in a complete and accessible manner. The focus is therefore on summarising the status and levels of transparency on core aspects of Seychelles' marine fisheries sector.
- ***Ultimately, the impact of these annual FiTI Reports does not lie in the act of publishing information.*** It relies on how this information is used and on the willingness of decision-makers to listen to the ideas and concerns of stakeholders on how marine fisheries should be managed. The National MSG welcomes therefore that Seychelles' commitment to the FiTI is also anchored in its wider commitment to open governments, highlighted in particular via the country's national action plan regarding the Open Government Partnership.



Notable transparency observations for Seychelles' fisheries sector in 2019:



A significant amount of information on Seychelles' fisheries sector is already collated by national authorities (e.g. the Ministry of Fisheries and the Blue Economy, the Seychelles Fishing Authority), but this information is often not accessible online.

This is in particular noteworthy for [catch information](#) from the large-scale fishing sector, where Seychelles Fishing Authority (SFA) collates extensive data sets, enabling detailed analysis (e.g. catches by species, by flag State, by gear type). However, significant inconsistencies in these data sets for 2019, caused by SFA-internal processing challenges as well as lack of information from the industrial longline fishery³, reduce the meaningfulness of this information.



As part of this first FiTI Report, previously unpublished information is now publicly available⁴, including:

- ➔ The contract of the following [fishing access agreement](#), allowing foreign vessels to fish in Seychelles' waters⁵:
 - Government of Mauritius⁶
- ➔ Key [legal, policy and management documents](#) governing Seychelles' fisheries

³ 2019 catch data from the industrial longline fishery is seen as significantly incomplete, as it often only includes statistics from Semester 1 (January – June 2019), and also suffers from partially unreturned logbooks.

⁴ Either online by government authorities, or as an interim solution as part of this FiTI Report.

⁵ The term '[Seychelles' waters](#)' is used synonymously within this report to the country's marine jurisdictional waters (i.e. Territorial Sea and Exclusive Economic Zone).

⁶ Seychelles signed two agreements with Mauritius: an agreement for foreign-flagged vessels to fish in Seychelles' waters, and an agreement for Seychelles-flagged vessels to fish in Mauritius' waters. Both have been published by SFA as part of the FiTI reporting process.

- ➔ A summary of the *status of fish stocks in Seychelles*
- ➔ The names of the *25 licence holders for Seychelles' sea cucumber fishery*
- ➔ Information on the various types of *fisheries subsidies available to Seychelles' small-scale fisheries* (only for 2018; data for fuel subsidies is available for 2019)



As part of this FiTI reporting process, the National MSG compiled a [summary for each of the four fisheries in Seychelles](#) (i.e. recreational, commercial, scientific, and sport fishing). This is to facilitate the understanding of tenure arrangements by the general public, including information on fees, durations, fishing conditions, transferability and divisibility of fishing rights.



A significant amount of important information categories are still not available to the public, such as:

- ➔ *Stock assessments* produced or commissioned by SFA;
- ➔ The contracts of the following *three private fishing access agreements*, allowing foreign vessels to fish in Seychelles' waters:⁷
 - Taiwan Deep-sea Tuna Longline Boat Owners and Exporters Association (TTA)
 - Top Fortune International (TFI)
 - Dongwon Industries Co. Ltd.⁸
- ➔ A *registry for large-scale fishing vessels* (access was given to SFA's internal vessel record but due to a high number of inconsistencies encountered during this FiTI Report, this information is not provided here)
- ➔ *Payments made by large-scale vessels* for their fishing activities in Seychelles' waters
- ➔ Information on whether *fisheries subsidies* are given to the *large-scale fishing sector* (if any)

As part of this FiTI Report, the National Multi-Stakeholder Group made clear recommendations to the Government of Seychelles to improve

⁷ Additionally, the agreements signed between Seychelles and the EU and between Seychelles and Mayotte, are both published along with their relevant protocols on the website of the EU, but not on a website of Seychelles' government.

⁸ It appears that no written agreement exists between Seychelles and Dongwon Industries Co. Ltd.

transparency in its fisheries management in order to adhere to the FiTI Standard.



The number of *licences in Seychelles' small-scale fisheries* is not published, and information that has been given as part of this FiTI reporting process cannot be seen as complete.

Furthermore, no up-to-date evaluations or audits of the *economic, social and food security contributions of the small-scale fisheries sector* in Seychelles are available.



By March 2021, the MFBE has already initiated the process to determine policy/implementation procedures for *beneficial ownership transparency* regarding companies involved in the fishing sector.

“ The report shows there are significant gaps in the online availability of fisheries information and, as a likely result of this, certain aspects of Seychelles' fisheries are known to generate controversies among the general public. Therefore, we, the FiTI National Multi-Stakeholder Group of Seychelles, aimed to provide additional background information within this first report to facilitate the public understanding and appreciation of Seychelles' fisheries sector.

It is expected that future FiTI Reports (conducted on an annual basis) will be able to reference existing information in the public domain and, thus, shorten the reporting effort significantly. ”



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

Key information for 2019:

Major marine <u>fisheries laws and regulations</u> in Seychelles:	<u>2</u>	<ul style="list-style-type: none"> ➔ Fisheries Act (2014) ➔ Fisheries Regulations (1987)
Number of major official <u>policy documents</u> regarding marine fisheries:	<u>2</u>	<ul style="list-style-type: none"> ➔ Seychelles Fisheries Sector Policy and Strategy (2019) ➔ Fisheries Comprehensive Plan (2019), focused on small-scale fisheries
Number of <u>fisheries management plans</u> :	<u>2</u>	<ul style="list-style-type: none"> ➔ Mahé Plateau trap and line fishery co-management plan (2020) ➔ National Plan of Action for the Conservation and Management of Sharks 2016-2020

Summary of transparency assessment for 2019:

Is the information <u>available</u> to the government of Seychelles?	Is the information published on a government website and freely <u>accessible</u> ?	Is the information seen as <u>complete</u> by the National Multi-Stakeholder Group?
 Yes	 To a large extent	 To a large extent



At the beginning of this FiTI Report process, a significant number of laws, policy documents and management plans were not published online, including the Fisheries Act (2014) and the Fisheries Regulations (1987). These documents are now published on the website of SFA.



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



The majority of fisheries laws and regulations can be downloaded from a non-governmental online repository, courtesy of the Seychelles Legal Information Institute (SeyLii). However, as this is not an official government website, information published there is evaluated as non-accessible in accordance with the FiTI Standard. All laws and regulations concerning fisheries are published in the Official Gazette.



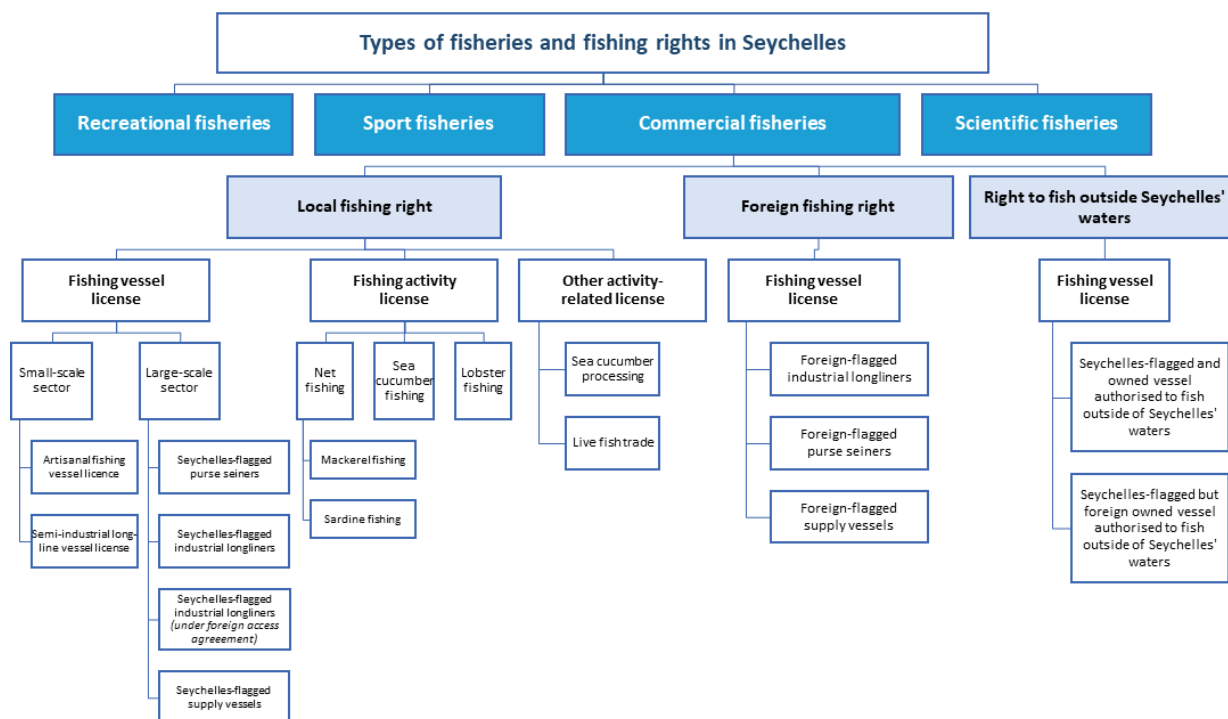
Fisheries Tenure Arrangements

Fisheries tenure agreements define who can use which fish resources, for how long, and under what conditions, amongst other features. Such agreements are one of the most critical aspects of sustainable fisheries management. Fisheries tenure systems define how and why governments allocate rights for fishing.




Key information for 2019:

The Fisheries Act (2014) is the main piece of legislation regarding fishing rights, authorisations, procedures and dispensation for all types of fisheries in Seychelles. Many of the articles concerning rights and authorisations in the Act are reiterated in the Fisheries Regulations (1987).

Furthermore, the procedures to apply for a fishing permit and authorisation have been partially updated for the small-scale fisheries and is summarised in the Fisheries Comprehensive Plan (2019).



Summary of transparency assessment for 2019:

Is the information <u>available</u> to the government of Seychelles?	Is the information published on a government website and freely <u>accessible</u> ?	Is the information seen as <u>complete</u> by the National Multi-Stakeholder Group?
 <p><i>Partially</i></p>	 <p><i>Partially</i></p>	 <p><i>Partially</i></p>



As part of this FiTI Report process, the National MSG compiled a summary for each of the four fisheries (and their relevant fishing rights) to facilitate the understanding of tenure arrangements by the general public, including information on fees payable, the duration, fishing conditions, transferability and divisibility of such rights.



There is significant opacity regarding procedures for participating in the sea cucumber fishery in Seychelles, in particular when compared to the spiny lobster fishery, which is much more transparent.

However, as part of this FiTI Report process, SFA has published the list of businesses and individuals participating in the sea cucumber fishery (see Annex C).

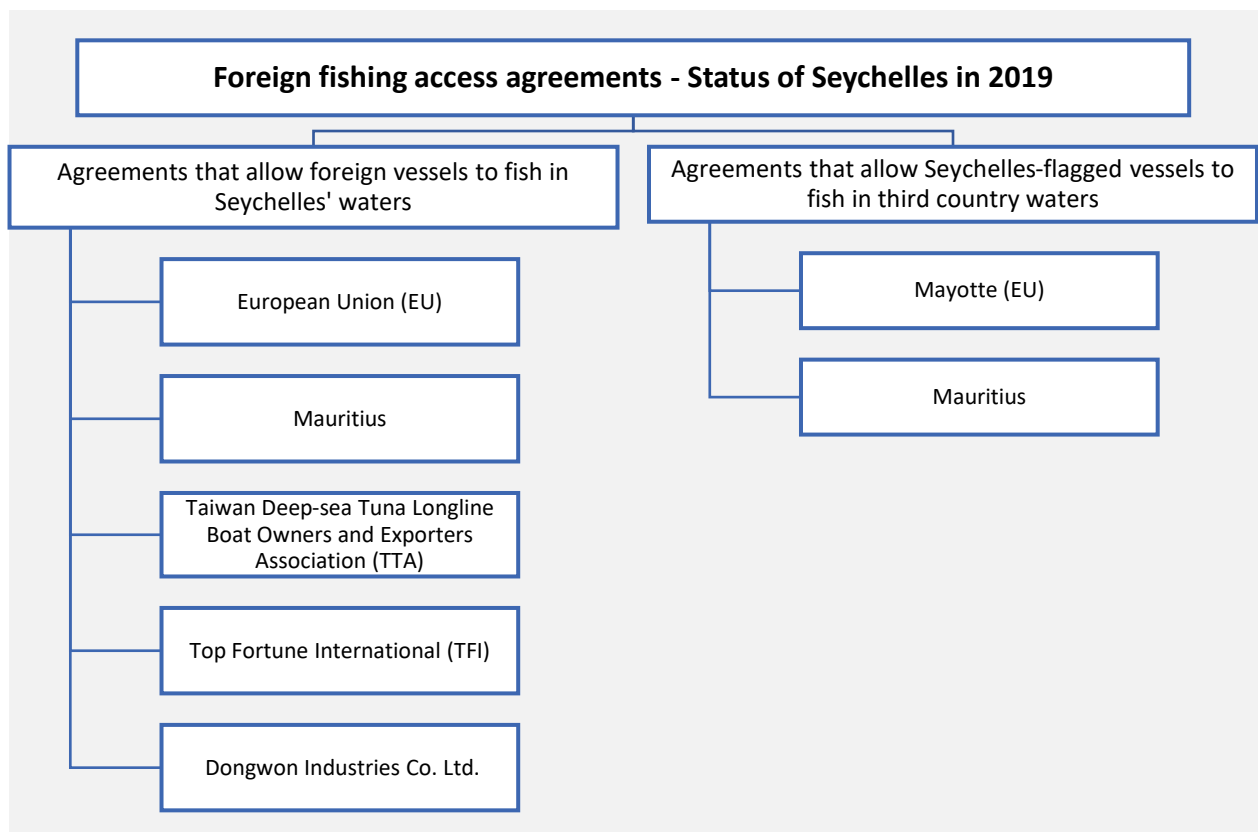


Foreign Fishing Access Agreements

A foreign fishing access agreement refers to a contractual arrangement that is entered into between a coastal state (e.g. Seychelles) and a foreign party that allows for fishing vessels to operate in the country’s marine jurisdictional waters (i.e. Territorial Sea and EEZ). Such a foreign party can be either a foreign government, a union of foreign governments (such as the EU), a private company, or an association of private companies. These agreements provide fishing opportunities in return for payments or investments, and usually set out the conditions that regulate fishing activities.




Key information for 2019:

Agreements that allow foreign vessels to fish in Seychelles' waters:	<u>5</u>
Agreements that allow Seychelles-flagged vessels to fish in third country waters:	<u>2</u>



Number of studies or reports that provide evaluation or oversight of these agreements:	<u>1</u>	➔ <i>Related to the access agreement with the EU</i>
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Summary of transparency assessment for 2019:

Is the information <u>available</u> to the government of Seychelles?	Is the information published on a government website and freely <u>accessible</u> ?	Is the information seen as <u>complete</u> by the National Multi-Stakeholder Group?
 <i>To a large extent</i>	 <i>Partially</i>	 <i>Unknown</i>



During this FiTI reporting process, SFA published the two access agreements with the government of Mauritius, which allowed Seychelles-flagged vessels to fish in Mauritian waters and Mauritius-flagged vessels to fish in Seychelles' waters.



None of the other access agreements that allow foreign vessels to fish in Seychelles' waters have been published by the Seychellois government.

The only available information relating to agreements signed by Seychelles are the agreements between Seychelles' and the EU and between Seychelles and Mayotte, which have both been published along with their relevant protocols on the website of the European Commission.



The only published information concerning the evaluation of foreign fishing access agreements is in relation to catches made by vessels under such agreements. These have been partially published for the year 2019 as part of the Fisheries Statistical Report 2019. There were also two oversight reports on the implementation of the sectoral support provided to Seychelles as part of the EU agreement. These were prepared by SFA but have not been published.



There appears to be no written agreement (i.e. contract) between Seychelles and Dongwon Industries Co. Ltd.⁹



Confidentiality clauses that would restrict the publication of future agreements and protocols should be avoided.

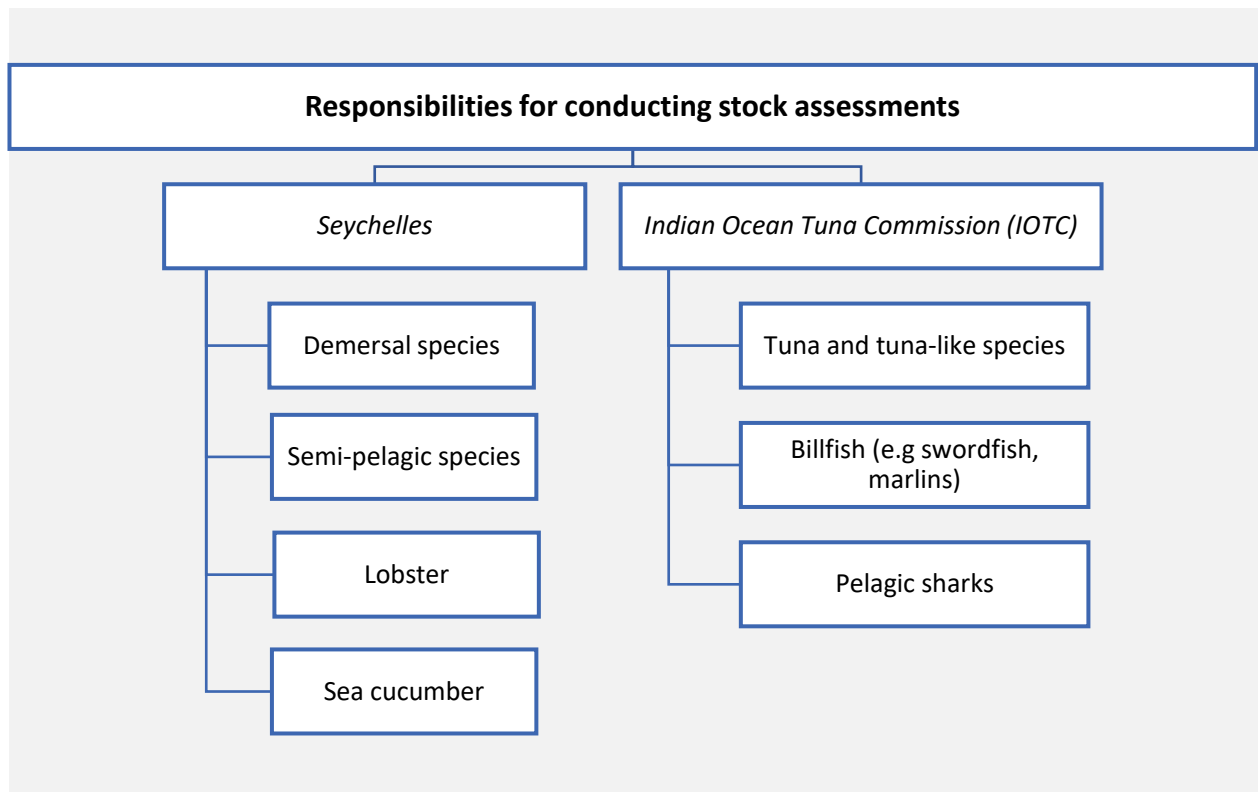
⁹ It is noted that section 11(4)(b) of the Fisheries Act allows fishing in Seychelles' waters without an agreement: 'A licence under subsection (3) shall (a) be granted on payment of such fee as provided for in an international agreement under section 12; or (b) in the absence of an agreement under section 12, be granted on payment of the prescribed fee.'



The State of the Fisheries Resources

Key information for 2019:

Given that different species are pursued as part of fishing activities in Seychelles' waters, the following simplified overview chart outlines the responsibilities for conducting stock assessments.



Number of stock assessments published by national authorities in Seychelles:

1

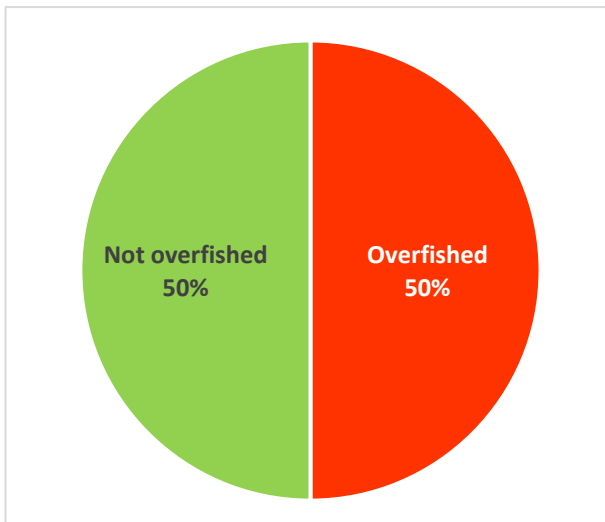
➡ *Spiny lobsters around Seychelles' principal island of Mahé*

Number of species groups with stock status information (up to 2018):

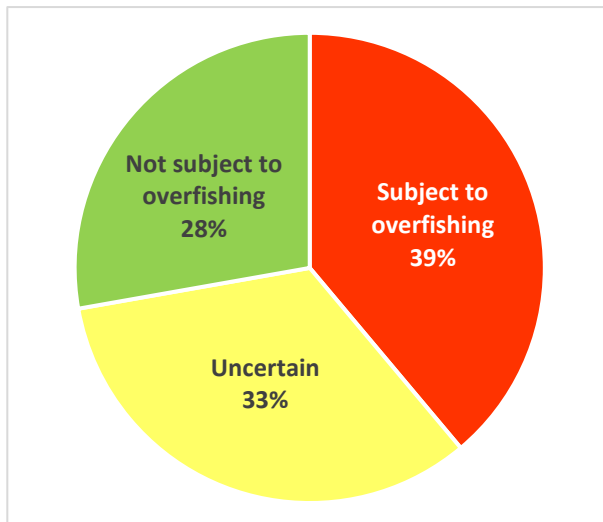
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[For a complete listing, please refer to section 2.4 of this report]




thereof: Stock status (biomass)¹⁰





thereof: Fishing pressure¹¹



Summary of transparency assessment for 2019:

Is the information <u>available</u> to the government of Seychelles?	Is the information published on a government website and freely <u>accessible</u> ?	Is the information seen as <u>complete</u> by the National Multi-Stakeholder Group?
 <i>To a large extent</i>	 <i>No</i>	 <i>No</i>

-  None of the stock assessments produced or commissioned by SFA are publicly available.
-  A comprehensive report on the status of fish stocks in Seychelles has also not been compiled.

¹⁰ Stock status indicates whether the biomass in the stock is able to support largest long-term average catch or yield under the existing environmental conditions. This long-term average catch or yield is commonly referred to as the maximum sustainable yield (MSY). Overfished indicates that the biomass is below the level to support the MSY. Vice versa, not overfished indicates that the stock biomass is at a level where it can produce the MSY.

¹¹ Level of fishing pressure indicates whether a stock is experiencing too much fishing or not. *Subjected to overfishing* indicates a stock has a fishing mortality (harvest) rate that is higher than MSY. *Not subjected to overfishing* indicates that the fishing mortality is not affecting MSY.



Large-Scale Fisheries

Large-scale commercial fishing, also known as industrial fishing, can be a significant source of food provision, employment and income generation for many countries. It often involves the use of large, high-capacity boats, equipped with on-board facilities for freezing and processing seafood at sea. These vessels also often remain at sea for long periods of time and carry large crews for catching and processing fish on board.

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 Plan¹². 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.



Who is allowed to fish? Large-scale vessel registry



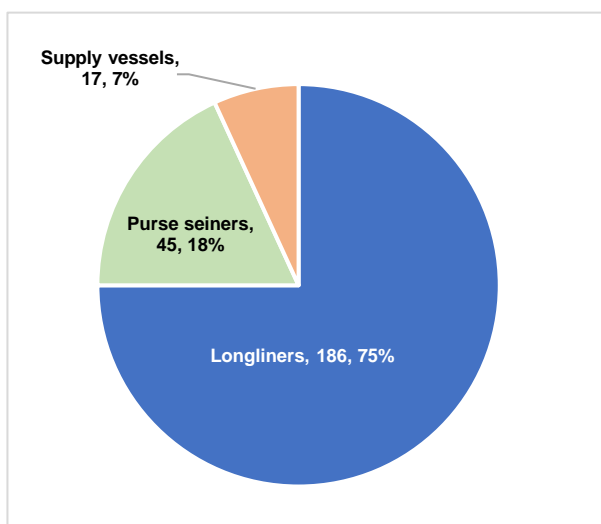
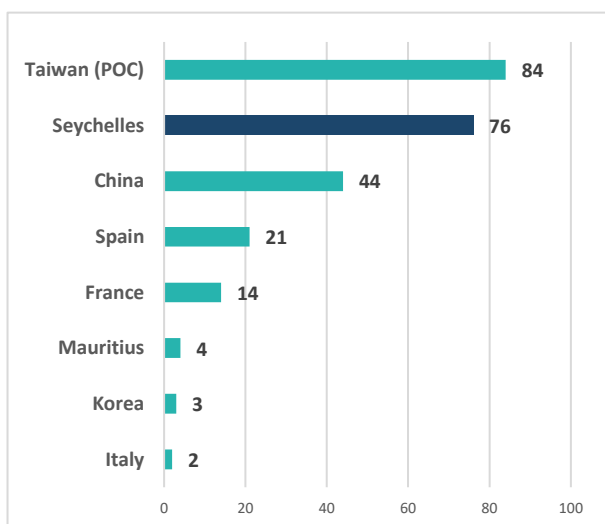
Key information for 2019:

Number of large-scale vessels authorised to fish in *Seychelles' waters*:

248

Disaggregated according to flag State:

Disaggregated according to vessel type:



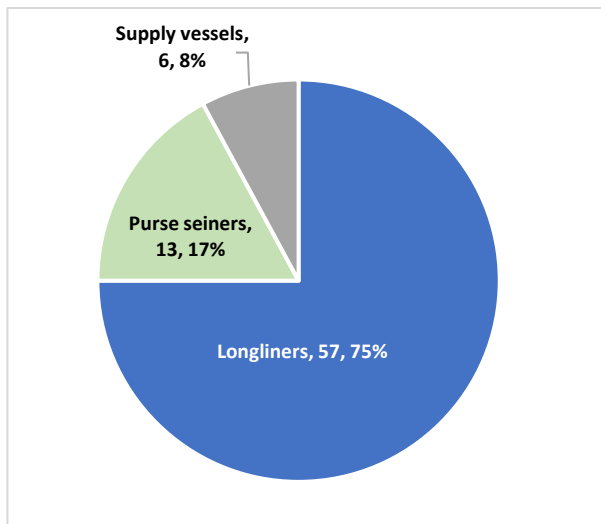
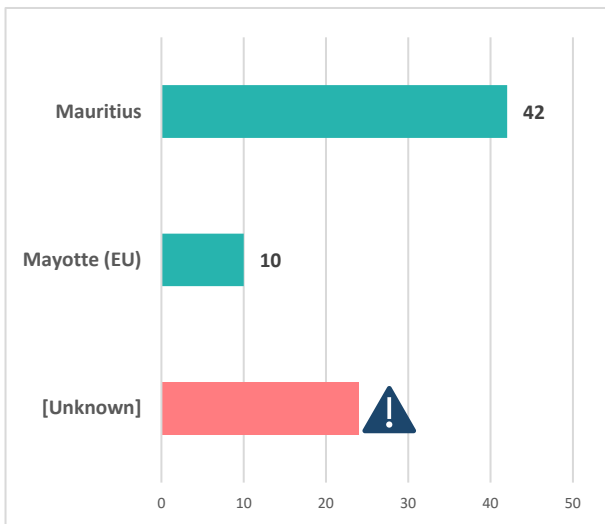
¹² See next chapter.

Number of *Seychelles-flagged* large-scale vessels authorised to fish in third countries' waters and on the High Seas:

76

Disaggregated according to *third countries*:¹³

Disaggregated according to *vessel type*:



Summary of transparency assessment for 2019:

Is the information <u>available</u> to the government of Seychelles?	Is the information published on a government website and freely <u>accessible</u> ?	Is the information seen as <u>complete</u> by the National Multi-Stakeholder Group?
<i>To a large extent</i>	<i>No</i>	<i>No</i>

- SFA collates information about large-scale vessels and lists them in an internal vessel record. However, this record is not published online.
- The assessment of SFA's internal vessel records, conducted as part of this FiTI reporting process, showed that only 170 licenced vessels were recorded with registration attributes for 2019. However, according to the Fisheries Statistical Report, 248 vessels were licenced to fish in Seychelles' waters that same year.
- The internal vessel record of SFA, although not published online, comprises 12 of the 14 vessel attributes as required by the FiTI Standard.

¹³ This graph is incomplete, as according to SFA certain data sets were lost in a ransomware attack, and the physical files cannot be accessed due to fungus infestation. Furthermore, it is currently unclear whether vessels licenced to fish in Mayotte (EU) also have access to Mauritian waters, or vice versa.



How much is paid for the right to fish? Payments from large-scale vessels



Key information for 2019:

Payments made by large-scale vessels for their fishing activities in Seychelles' waters:

Unknown

Number of large-scale vessels for which licence payments could be verified:

142 out of 248 (57%)

Summary of transparency assessment for 2019:

Is the information <u>available</u> to the government of Seychelles?	Is the information published on a government website and freely <u>accessible</u> ?	Is the information seen as <u>complete</u> by the National Multi-Stakeholder Group?
<p><i>To a large extent</i></p>	<p><i>No</i></p>	<p><i>To a limited extent</i></p>



Information on payments made by large-scale vessels for fishing activities in 2019 is not published online. However, this information is collated by SFA and is kept in a QuickBooks accounting software and on physical files.



The National MSG was unable to verify whether all 248 large-scale vessels licenced to fish in Seychelles' waters in 2019 had paid their licence fees. As stated above, SFA's internal vessel registry only comprises 170 large-scale vessels. From this record, the National MSG was able to verify for 142 vessels that their payments were made prior to the licence start date.



The publication of payments for fishing activities on a per vessel basis, as required under the FiTI Standard, is not allowed under the Sustainable Fisheries Partnership Agreement between Seychelles and the European Union. Only aggregated data related to fishing activities in Seychelles' waters can be made available in the public domain.



How much fish has been caught?

Annual retained catches from large-scale vessels

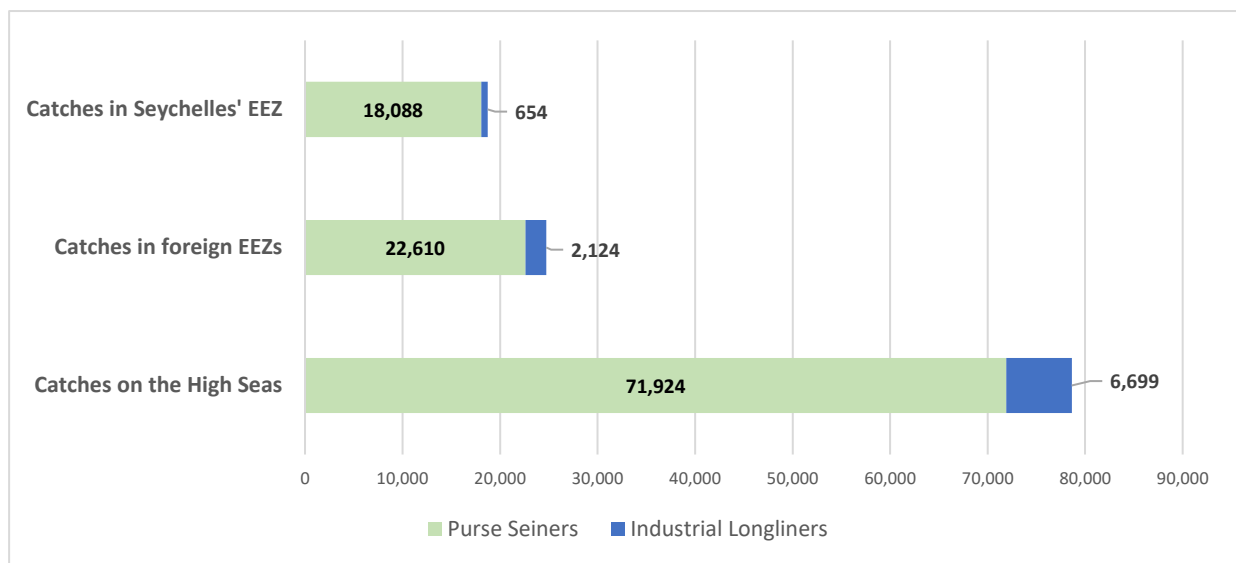


Key information for 2019:

Annual retained catches by Seychelles-flagged vessels:

122,099 Mt

Information is incomplete, due to missing catch data from industrial longline fishery.

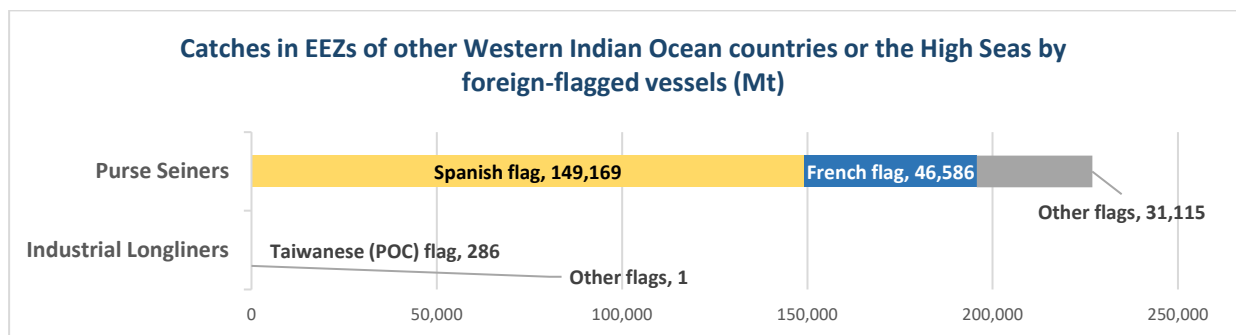
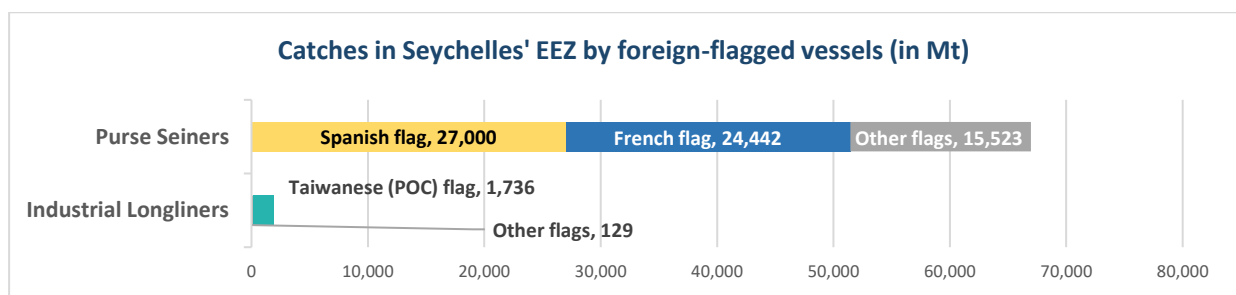


Values in Mt

Annual retained catches by foreign-flagged vessels:

295,987 Mt

Information is incomplete, due to missing catch data from industrial longline fishery.

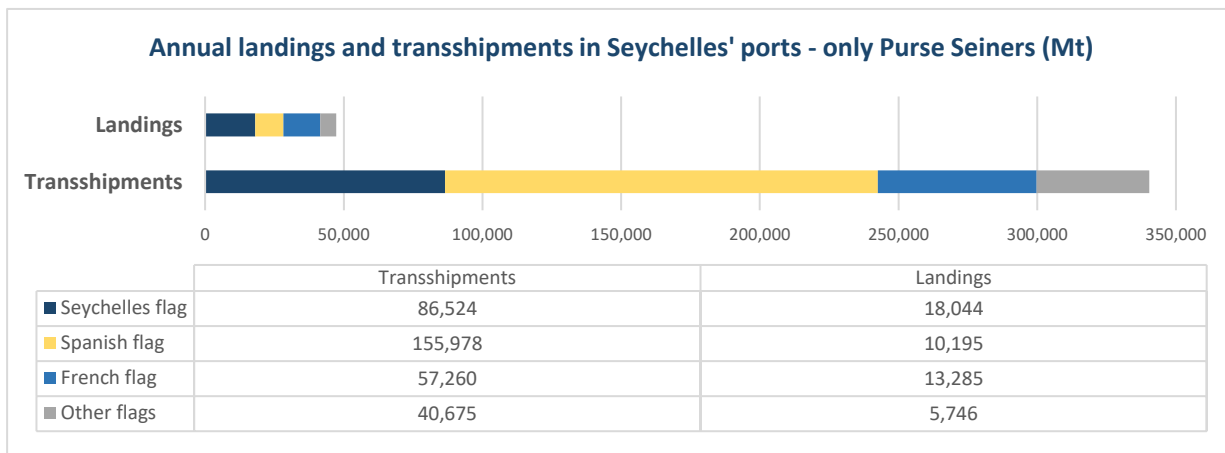


Annual landings and transshipments in Seychelles' ports:

387,707 Mt



Information is incomplete, as the data from industrial longline fishery is not fully collated.



Annual landings and transshipments in foreign ports:

19,104 Mt



- ➔ Data refers only to fish caught by purse seiners licenced to fish in Seychelles' waters
- ➔ Value corresponds to 5% of total catch from these purse seiners
- ➔ Only two foreign ports were used in 2019 for landings and transshipments: Diego Suarez (Madagascar) and Port Louis (Mauritius)

Fishing effort by purse seine vessels licenced to fish in Seychelles' waters:

2,577 days spent fishing within Seychelles' EEZ

- ➔ Total of 10,116 days spent fishing in the Western Indian Ocean

Fishing effort by industrial longline vessels licenced to fish in Seychelles' waters:

6 million hooks deployed within Seychelles' EEZ



- ➔ Data covers only Semester 1 of 2019 (January – June)
- ➔ Total of over 21 million hooks deployed in the Western Indian Ocean

Summary of transparency assessment for 2019:

Is the information <u>available</u> to the government of Seychelles?	Is the information published on a government website and freely <u>accessible</u> ?	Is the information seen as <u>complete</u> by the National Multi-Stakeholder Group?
 <p>To a large extent</p>	 <p>To a large extent</p>	 <p>Partially</p>



SFA collects and publishes (mainly through its Fisheries Statistical Report) a large amount of data regarding catches, landings, transshipments and fishing efforts from the large-scale fisheries.



Catch data from the *purse seiner fishery* is perceived as complete, and is provided in a highly disaggregated form, which fulfils almost all requirements of the FiTI Standard.



Catch data from the *industrial longline fishery* is seen as significantly incomplete, as published data only includes Semester 1 (January – June 2019) catches for the Seychelles' and Taiwanese (POC)-flagged vessels and Quarter 1 (January – March 2019) catches for other-flagged vessels, and also suffers from partially unreturned logbooks.

Furthermore, SFA does not extrapolate nominal catch data to compensate for unreturned logbooks and can therefore not estimate an annual total catch from this fishery.



Though data on fish discards from the *purse seiner fishery* has been published in the Fisheries Statistical Report for the year 2019, this data is not disaggregated by species or species group.

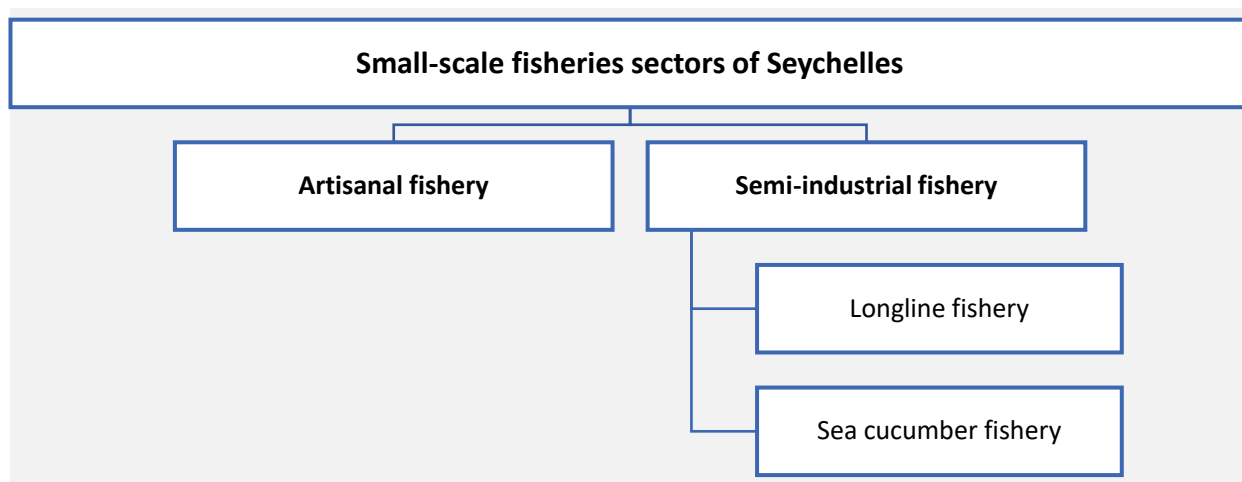
No data on discards from the *industrial longline fishery* has been published.



Small-Scale Fisheries

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.'*

The economic, social and cultural contributions of small-scale fishing are significant for Seychelles, as is its contribution to ensuring food security in terms of animal protein for the country.

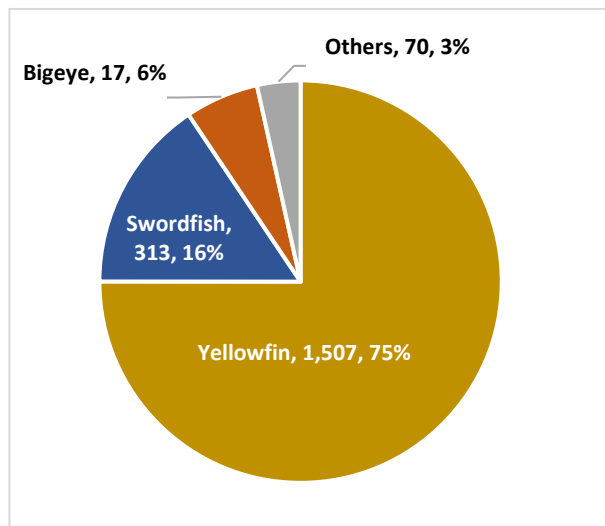
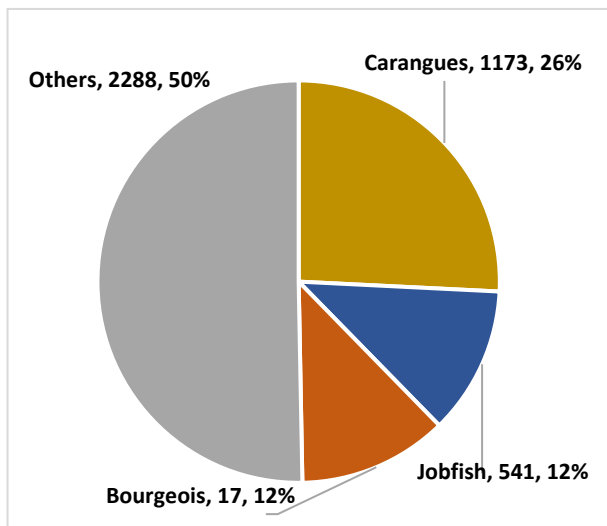


Key information for 2019:

<p>Number of active small-scale fishing <u>vessels</u>:</p>	<p>503</p> <p>⚠</p>	<p>Thereof:</p> <ul style="list-style-type: none"> ➔ 469 vessels in artisanal fishery ➔ 34 vessels in semi-industrial fishery <p><i>Data is seen as incomplete</i></p>
<p>Number of fishing <u>licences</u> issued to small-scale fishing vessels:</p>	<p>203</p> <p>⚠</p>	<p>Thereof:</p> <ul style="list-style-type: none"> ➔ Artisanal: 148 ➔ Semi-industrial: 7 ➔ Net: 13 ➔ Sea cucumber: 25 ➔ Lobster: 10 <p><i>Data is seen as incomplete</i></p>

<p>Number of <i>fishers</i> engaged in the fishing sector:</p>	<p><u>243</u></p> <p>⚠</p>	<p>Thereof:</p> <ul style="list-style-type: none"> ➔ Boat owner fisher: 85 (all males) ➔ Fisher: 126 (males: 124, females: 2) ➔ Divers: 32 (all males) <p><i>Data is seen as incomplete as: i) it does not correspond to number of active vessels; ii) the number of registered fishers in 2020 was 993.</i></p>
<p><i>Payments</i> for fishing license fees made by small-scale fisheries:</p>	<p><u>SCR 543,408</u></p>	<ul style="list-style-type: none"> ➔ No payments are made by small-scale fisheries vessels for catches and landings
<p>Quantity of <i>catches</i> made by small-scale fisheries:</p>	<p><u>6,558 Mt</u></p> <p>⚠</p>	<ul style="list-style-type: none"> ➔ Artisanal fishery: 4,549 Mt ➔ Semi-industrial fishery: 2,009 Mt <p><i>Data is seen as partially incomplete</i></p>

<p>Catches by Artisanal fishery (in Mt)</p> <p><i>Top 3 species</i></p>	<p>Catches by semi-industrial fishery (in Mt)</p> <p><i>Top 3 species</i></p>
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Summary of transparency assessment for 2019:

Is the information <u>available</u> to the government of Seychelles?	Is the information published on a government website and freely <u>accessible</u> ?	Is the information seen as <u>complete</u> by the National Multi-Stakeholder Group?
 <p><i>To a large extent</i></p>	 <p><i>To a limited extent</i></p>	 <p><i>Partially</i></p>



The number of vessels, licences and catches in Seychelles' small-scale fisheries cannot be seen as complete, due to certain reporting gaps (e.g. omission of certain fisheries, in particular sea cucumber and lobster).



No information regarding the species of volumes discarded by small-scale fisheries is available.



No up-to-date evaluations or audits of the economic, social and food security contributions of the small-scale fisheries sector in Seychelles are available.



Post-Harvest Sector and Fish Trade

Fish is the most traded agricultural product in the world (in monetary terms); the value of fish traded internationally is greater than that of many other food products, such as coffee, tea and sugar combined. Furthermore, consumers around the world also now value seafood products both as being highly nutritious and as having a smaller carbon footprint compared to other animal proteins, adding to the growing demand for fish and fish products. Public availability of complete data is therefore paramount to give the fisheries sector the visibility it deserves in national debates.

Key information for 2019:

Total quantity of fish and fish products produced:	<u>Unknown</u>	<i>The SFA Annual Report, which typically provides this information, has not been published yet.</i>
Total value of <u>imports</u> of fish and fish products:	<u>SCR 1.566 billion</u>	<ul style="list-style-type: none"> ➔ <i>Total import weight is 76,441 Mt [values from 2016; 99.6% of import weight was frozen tuna for the canning factory]</i> ➔ <i>Most of the imported frozen tuna are from the sale of EU-flagged vessels to the local canning factory and from certified fishery in the Maldives.</i>
Total value of <u>exports</u> of fish and fish products:	<u>SCR 3.577 billion</u>	<p><i>Thereof:</i></p> <ul style="list-style-type: none"> ➔ <i>Canned tuna: 86.5%</i> ➔ <i>Fresh and frozen fish: 6.3%</i> ➔ <i>Fish meal: 3.2%</i> ➔ <i>Fish oil and fats: 2.2%</i> ➔ <i>Sea cucumber: 1.8%</i>
Total number of <u>people employed in commercial fisheries sectors</u> in Seychelles:	<u>Unknown</u>	<i>A 2018 study showed that 6,900 people (including full-time and part-time) were employed in the industrial tuna fishery, thereof: 72% males, 28% females.</i>

Total number of people employed in the informal fisheries sectors in Seychelles:

Unknown

The National MSG was unable to provide an opinion on how extensive the Seychelles' informal fisheries sector is.

Summary of transparency assessment:

Is the information <u>available</u> to the government of Seychelles?	Is the information published on a government website and freely <u>accessible</u> ?	Is the information seen as <u>complete</u> by the National Multi-Stakeholder Group?
 <i>To a large extent</i>	 <i>To a large extent</i>	 <i>Partially</i>



The SFA Annual Report 2019, a common source for trade-related fisheries data, is still not published as of today (March 2021).



Information on the quantity of exports and imports of fish and fish products has been published by the National Bureau of Statistics; however, this data is not always disaggregated by species and the country of origin or destination.



An 'Employment and capacity needs assessment study for the fisheries sector in Seychelles' is currently being conducted, funded by the SWIOFish3 project. This study will provide more information on employment in different fisheries sub-sectors, including a gender breakdown. It is estimated that this study will be published by mid-2021.






Fisheries Law Enforcement

Non-compliance with national laws on fishing is a major challenge to sustainable and equitable fisheries. While significant international attention has been given to combating ‘illegal, unreported and unregulated’ (IUU) fishing, the implementation of effective national law enforcement activities in the fisheries sector, including on penalties and prosecutions, is an equally important aspect.

Key information for 2019:

<p><u>Financial and human resources</u> deployed by the government to ensure compliance with national legislation:</p>	<p><u>SCR 9,563,817</u></p> <p></p>	<ul style="list-style-type: none"> ➔ This value includes the operational and staff budget for the Monitoring, Control and Surveillance (MCS) Division of SFA. ➔ Information from other relevant authorities is not available.
<p>Number of <u>inspections</u> of fishing vessels at sea and in ports</p>	<p><u>Unknown</u></p>	<p>The SFA Annual Report, which typically provides this information, has not been published yet for 2019.</p>
<p>Number of <u>convictions</u> for major offences in the fisheries sector:</p>	<p><u>6</u></p> <p></p>	<p>7 foreign vessels were apprehended for IUU fishing in 2019, originating from:</p> <ul style="list-style-type: none"> ➔ Sri Lanka: 5 ➔ Madagascar: 1 ➔ Comoros: 1 <p>Out of those 7 cases, 6 were convicted, and one was released.</p> <p>This number covers only convictions related to IUU fishing, but not other committed offences (e.g. fishing without a licence).</p>

Summary of transparency assessment:

Is the information <u>available</u> to the government of Seychelles?	Is the information published on a government website and freely <u>accessible</u> ?	Is the information seen as <u>complete</u> by the National Multi-Stakeholder Group?
 <p><i>To a large extent</i></p>	 <p><i>No</i></p>	 <p><i>No</i></p>



No comprehensive report on national activities and strategies for ensuring compliance of fishing vessels and the post-harvest sector existed. Furthermore, key compliance and policy instruments, such as the 'The National Plan of Action (NPOA) for Illegal, unreported and unregulated (IUU) fishing' are not published online.



A record of convictions for major offences in the fishing sector for 2019 is collated by SFA, but not published online.



Labour Standards

Fishing plays a crucial role in employment and economic activity, whether a person is engaged full-time, part-time, or works as an occasional fisher or with unspecified status. Working in fishing involves long hours and strenuous activity in an often challenging marine environment.

Key information for 2019:

Public authority responsible for monitoring and enforcing laws on labour standards:	Ministry of Employment and Social Affairs (MESA)	
Financial and human resources deployed by the government to enforce laws on labour standards in the fisheries sector:	Unknown	<i>15 inspectors of the MESA seek to enforce labour standards across all sectors of the economy, including fisheries</i>
Number of offences committed by employers in the fisheries sector that have been resolved by the authorities:	Unknown	<p><i>Since 2016, there have been 21 complaints of unpaid salary in the fisheries sector, thereof:</i></p> <ul style="list-style-type: none"> <i>➔ 1x settled by mediation,</i> <i>➔ 19x withdrawn</i> <i>➔ 1x still pending</i> <p><i>No information for 2019 is published.</i></p>

Summary of transparency assessment:

Is the information available to the government of Seychelles?	Is the information published on a government website and freely accessible ?	Is the information seen as complete by the National Multi-Stakeholder Group?
 Yes	 To a large extent	 Partially



No summary description of national laws on labour standards, national strategies for enforcing labour standards or information on labour offences committed and resolved in the fisheries sector is available to facilitate public understanding.



Fisheries Subsidies

Subsidies have become one of the most controversial subjects in debates on fisheries reforms. Perhaps more than any other single factor, subsidies are seen as the source of a range of problems, such as overfishing, illegal fishing and unfair benefit-sharing.

Key information for 2019:

Value of <u>government financial transfers or subsidies</u> to the fisheries sector:	<u>Unknown</u>	
Value of <u>fuel subsidies</u> for <u>large-scale fisheries</u> :	<u>Unknown</u>	
Value of <u>fuel subsidies</u> for <u>small-scale fisheries</u> :	<u>SCR 43 million</u>	↻ 2018 value: SCR 32 million

Summary of transparency assessment:

Is the information <u>available</u> to the government of Seychelles?	Is the information published on a government website and freely <u>accessible</u> ?	Is the information seen as <u>complete</u> by the National Multi-Stakeholder Group?
 Yes	 To a limited extent	 No

- Very little information is published by national authorities about fisheries subsidies, failing to meet national requirements (e.g. Access to Information Act), policy objectives (e.g. reducing subsidy dependencies) as well as international expectations.
- No information is 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.
- As part of this FiTI reporting process, the National MSG compiled information on different types of subsidies provided to the small-scale fishing sector (section 2.10).



Official Development Assistance

Official development assistance (ODA) can present an important source of funds and assistance in the fisheries sector. However, awareness is growing globally about the lack of public information on the value of ODA, its purpose and impact, as well as a lack of public participation in decision-making over how ODA is used.

Key information for 2019:¹⁴

Number of <u>public sector projects</u> related to <u>fisheries</u> :	<u>2</u>	<ul style="list-style-type: none"> ➤ SWIOFish3 (financed by World Bank) ➤ Extension of the Providence fishing port (financed by the Government of Japan)
Number of <u>public sector projects</u> related to <u>marine conservation</u> :	<u>Unknown</u>	This information is not locally collated apart for projects that are funded by the Global Environmental Facility (GEF).
Number of corresponding <u>evaluations</u> of these public sector projects:	<u>Unknown</u>	It is known that for UNDP projects mid-term and end-of-project evaluations are undertaken, but these reports are not always published.

Summary of transparency assessment:

Is the information <u>available</u> to the government of Seychelles?	Is the information published on a government website and freely <u>accessible</u> ?	Is the information seen as <u>complete</u> by the National Multi-Stakeholder Group?
 Yes	 To a limited extent	 No



Very little visibility is given to fisheries-related public sector projects in Seychelles. There is almost no information on public sector projects being implemented on the websites of MFBE and SFA, and no references exist to websites of funding or implementation partners. Thus, several externally funded public sector projects related to fisheries, such as the World Bank's SWIOFish3 project, receive very little attention outside the core fisheries community in Seychelles.

¹⁴ Referring to public sector projects funded by bilateral, multilateral and private donors.



There are several marine conservation-related public sector projects being implemented in Seychelles, but there is no comprehensive overview of them provided by the government of Seychelles.



Financial contributions received from the EU under the Sustainable Fisheries Partnership Agreement for the support and implementation of Seychelles' sectoral fisheries and maritime policy (EUR 2,5 million for 2019) are compensation for fishing activities in fishing areas within Seychelles' EEZ.



Beneficial Ownership

Beneficial ownership – that is, the natural person who ultimately owns or controls a business or transaction – is a topic that is grabbing global attention. In fisheries, the demand for beneficial ownership transparency is linked to a range of policy concerns. Perhaps this is most notable in terms of the fight against illegal fishing and corruption, but it also includes efforts to expose the extent of tax evasion, economic concentration and foreign ownership in the sector.

Key information for 2019:

<u>Legal basis</u> for beneficial ownership transparency in Seychelles:	<u>None</u>
Availability of a <u>public register</u> of beneficial owners:	<u>None</u>

Summary of transparency assessment:

Is the information <u>available</u> to the government of Seychelles?	Is the information published on a government website and freely <u>accessible</u> ?	Is the information seen as <u>complete</u> by the National Multi-Stakeholder Group?
 <i>No</i>	<i>No applicable</i>	<i>Not applicable</i>



The legal basis for Beneficial Ownership transparency in Seychelles was established in 2020 with the promulgation of the Beneficial Ownership Act (2020) and Beneficial Ownership Regulations (2020). In addition, Beneficial Ownership Guidelines have been issued jointly by the Financial Services Authority and the Financial Intelligence Unit (2020).



By March 2021, MFBE has already initiated policy/implementation procedures for beneficial ownership transparency regarding companies involved in the fishing sector.



2) Detailed findings on the requirements for fisheries transparency in Seychelles [2019]

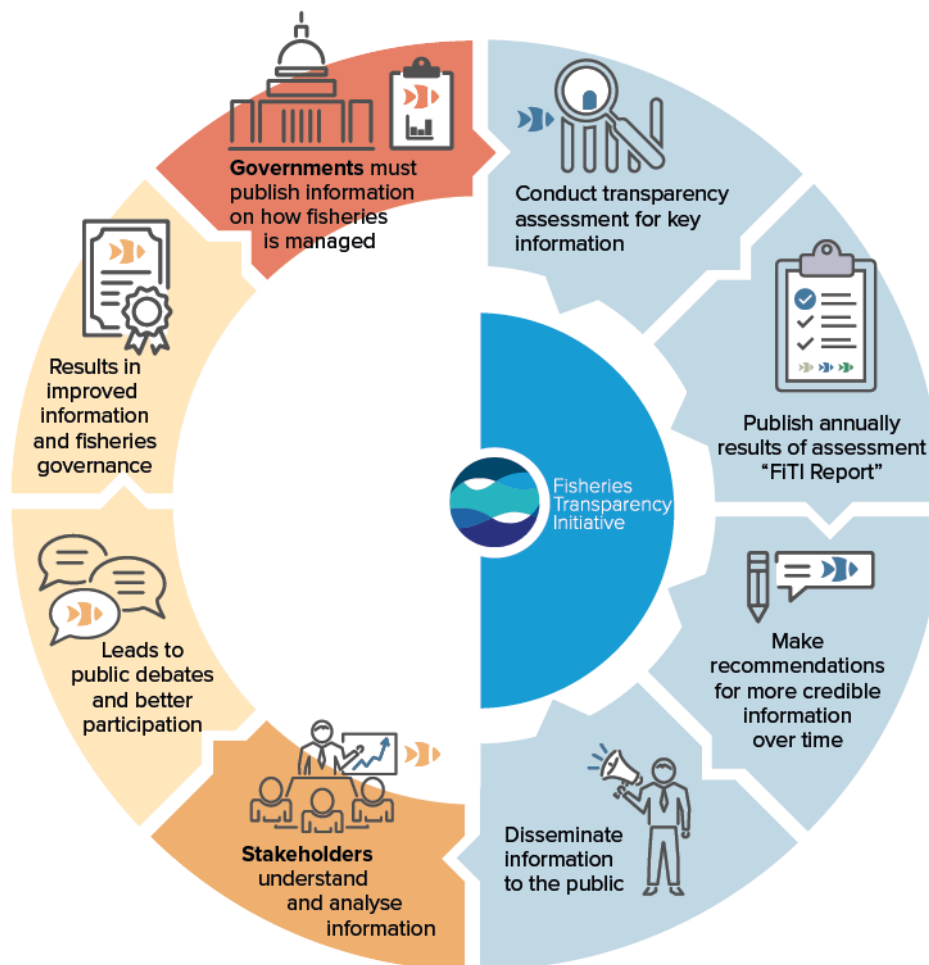
The need for governments to share information on fisheries is already described in the 1982 United Nations Convention on the Law of the Sea and the FAO's subsequent Code of Conduct for Responsible Fisheries. Since then, the importance of collating and sharing information with all stakeholders has been a message conveyed in other landmark documents on fisheries reforms.¹⁵

The concept of transparency in fisheries has become increasingly mainstreamed. The moment when this became most apparent was when the FAO published its State of the World Fisheries Report in 2010. It was the first time transparency was mentioned prominently by the FAO as being of central importance to various problems affecting marine fisheries worldwide:

Lack of basic transparency could be seen as an underlying facilitator of all the negative aspects of the global fisheries sector – IUU fishing, fleet overcapacity, overfishing, ill-directed subsidies, corruption, poor fisheries management decisions, etc. A more transparent sector would place a spotlight on such activities whenever they occur, making it harder for perpetrators to hide behind the current veil of secrecy and requiring immediate action to be taken to correct the wrong.

¹⁵ Such as the 2012 Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests and the 2015 Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries in the Context of Food Security and Poverty Eradication

The FiTI provides a unique global framework (i.e. the FiTI Standard) to help coastal countries to increase the credibility and quality of national fisheries information and demonstrate their commitments to improved fisheries governance.



The *FiTI Standard* defines for the first time what information on fisheries should be published online by public authorities. It was developed over a 2-year global multi-stakeholder endeavour to increase the credibility and quality of national fisheries management information.

The FiTI Standard covers 12 thematic areas of fisheries management (also referred to as transparency requirements) and is applicable to all countries.

The FiTI does not intend to replace or duplicate existing government websites, but rather supports the further development and maintenance of these public resources.

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

Transparency requirements	Availability	Accessibility	Completeness
Seychelles must provide an online, up-to-date registry of:			
All national legislation related to the marine fisheries sector.	Yes	No	No
All official policy documents related to the marine fisheries sector.	Yes	Partially	No

Major legislations and policies for Seychelles' fisheries sector:

The *Fisheries Act (2014)* is the primary legislation governing the fisheries sector of Seychelles. The Act provides for the management and sustainable development of the fisheries sector, and makes provision for the licensing of fishing vessels, the regulation and enforcement of fishing and fishing-related activities and caters for offences with regards to the breach of its provisions.

The *Fisheries Regulations (1987)* is the main piece of secondary legislation. Amongst other things, it covers the conditions for a local fishing licence, establishes management measures for certain fisheries and covers marking of vessels and gears.

The *Fisheries Sector Policy and Strategy (2019)* is the primary policy document for Seychelles' fisheries sector. Its primary objective is to provide the principles for the implementation of Seychelles' fisheries sector vision to 'develop fisheries to its full potential whilst safeguarding the marine environment and resource base for sustainability.'

The *Fisheries Comprehensive Plan (November 2019)* is a document developed to guide the future actions and spearhead the development of the fisheries sector for the next three years.

In the fisheries sector, it remains particularly difficult for the general public to get comprehensive information from official online sources on national legislation and policies. This is despite the existence of both an eGovernment Portal, as well as websites for the Ministry of Fisheries and the Blue Economy (MFBE)¹⁶ and the Seychelles Fishing Authority (SFA)¹⁷.

- ➡ **Online registry of national laws and regulations (eGovernment Portal):** The government of Seychelles has the required ICT infrastructure to provide online access to laws and regulations, in the form of the eDoc Repository on the eGovernment Portal¹⁸. However, this repository is not being effectively utilised and appears to be suffering from neglect. Documents related to laws and regulations within the portal's repository were scarce.

¹⁶ <http://mofa.gov.sc/>

¹⁷ <http://www.sfa.sc/>

¹⁸ <http://gov.sc/edoc/pubs/pub.aspx>. The eDoc Repository has sections dedicated to: Acts & Regulations, Annual Financial Audited Reports, Annual Reports, Guidelines, Plans, Policies, Quarterly Reports, Strategic Plans and White Papers.

Only 17 legal documents were available in total, none of which relate to the fisheries sector. Furthermore, the eDoc repository is not fully accessible, as it requires a username and password to login.¹⁹

- **Fisheries authorities' websites:** The website of the MFBE (still labelled the Ministry of Fisheries and Agriculture) currently publishes only the *Fisheries Comprehensive Plan (2019)* and the *Seychelles Fisheries Sector Policy and Strategy (2019)*. The recently relaunched website of SFA has a folder for legislations on a page labelled 'Publications & Forms' through which the following fisheries-related laws and legislations have now been made available due to the FiTI reporting process:

- the *Fisheries Act (2014)*
- the *Fisheries Regulations (1987)*
- the *Export of Fisheries Product Act (1996)*
- the *Food Act (2014)*
- the *Customs Management (Promotion of Agriculture and Fisheries) Exemption and Rebate Regulations (2014)*
- the *Export of Fishery Products (Designated Landing Sites) Order (2015)*

Similarly, the following four fisheries policy documents and management plans are now published on the SFA website, due to the FiTI reporting process:

- the *Fisheries Comprehensive Plan (2019)*; already published on the MFBE website
- the *Seychelles Fisheries Sector Policy and Strategy (2019)*; already published on the MFBE website
- the '*Mahé Plateau trap and line fishery co-management plan*' (2020), as published in the Official Gazette
- the *National Plan of Action for the Conservation and Management of Sharks (2016 – 2020)*

- **Non-governmental repository:** The National MSG took note of the existence of a non-governmental effort to publish laws and regulations in Seychelles, including those related to fisheries, provided by the SeyLii²⁰. This website provides access to proposed bills, acts and statutory instruments in force, as well as legal government notices and case laws. Documents are indexed both chronologically and alphabetically. Clicking on an Act also reveals links to other statutory instruments made under the particular act and those of closely related Acts and other statutory instruments. The website is searchable from

¹⁹ The usefulness of the login is unclear, since it can easily be circumvented by accessing the content of the repository directly, if the full webpage address is known. Furthermore, internet search engines are also able to retrieve information directly from the repository.

²⁰ <https://seylil.org/> SeyLii is an independent non-governmental and self-funded organisation, not dedicated to the fisheries sector, whose vision is to be the primary legal resource institution in Seychelles, providing free, reliable online access to essential Seychelles legal resources.

within through a search function. Though most documents on national fisheries laws and regulations are available online on the SeyLii website, this does not qualify as accessible under the FiTI Standard, due to its non-governmental nature. For example, there is no guarantees that SeyLii will continue to provide such services in the long-term, despite this being an integral part of its vision.

- **National Assembly documents:** Access to bills that are introduced to the National Assembly of Seychelles (NAS) for examination, discussion and amendment are obtainable through the NAS's official website²¹ along with videos of all sittings of the NAS and public hearings of certain assembly committees, starting from 27th September 2016. These online videos can be used for background research and verification of facts of what was said during debates concerning introduction and amendments of fisheries laws and regulations.
- **International laws, policy instruments and best practices:** Section 4(a) of the Fisheries Act states the responsibility of SFA is *'to provide for the effective management and sustainable development of fisheries in accordance with internationally recognised norms, standards and best practice including the United Nations Convention on the Law of the Sea (1982) and the Code of Conduct for Responsible Fisheries (1995) of the Food and Agriculture Organisation, Indian Ocean Tuna Commission Conservation and Management measures'*. Yet, none of these international documents that Seychelles is implementing or is a signature to²² are published or referenced on the websites of MFBE or SFA.

Recommendations

We, the National MSG, make the following recommendations to improve transparency regarding the provision of a public registry of national fisheries laws, regulations and official policy documents:

ID	Recommendation	Suggested priority	Suggested date for completion
2019-1_1	<i>MFBE should determine and implement a publication strategy to ensure that all national and international fisheries laws, regulations and official policy documents are published online, up-to-date, easy to locate and searchable.</i>	<i>High</i>	<i>December 2021</i>

²¹ <https://www.nationalassembly.sc/bills>

²² Examples: The Sustainable Blue Economy Finance Principles, Principles for Investment in Sustainable Wild-Caught Fisheries, the FAO's Code of Conduct for Responsible Fisheries, the Codex Alimentarius

2.2 Fisheries Tenure Arrangements

Transparency requirements	Availability	Accessibility	Completeness
Seychelles must publish a summary description of laws and decrees on fisheries tenure arrangements, including the following information:	No		
i. A description of the rights and authorisations applicable by law or decree, including those based on an individual or collective quota systems, for commercial, recreational, scientific or exploratory fisheries or for cultural use, and for access to and use of traditional sites, for landing fish, for temporary fish camps, for fish processing, or for other traditional use;	Yes	No	Yes
ii. The fees, duration, transferability and divisibility of such rights and authorisations;	Yes	No	Partially
iii. The persons that are legally entitled to issue access rights and fishing authorisations, the mandatory administrative procedures required to determine their issue, and the nature of any oversight or public consultation processes involved;	Yes	No	Yes
iv. The conditions applied to fishing authorisations including those relating to fishing effort and ecosystem impact, landings, transshipping and catch reporting;	Yes	No	Partially
v. The procedures and rules for authorising a Seychelles-flagged vessel to fish in a third country or on the High Seas, including information on the fees paid to the national government for providing this authorisation, reporting requirements and the provisions for terminating such authorisations.	Yes	No	Partially

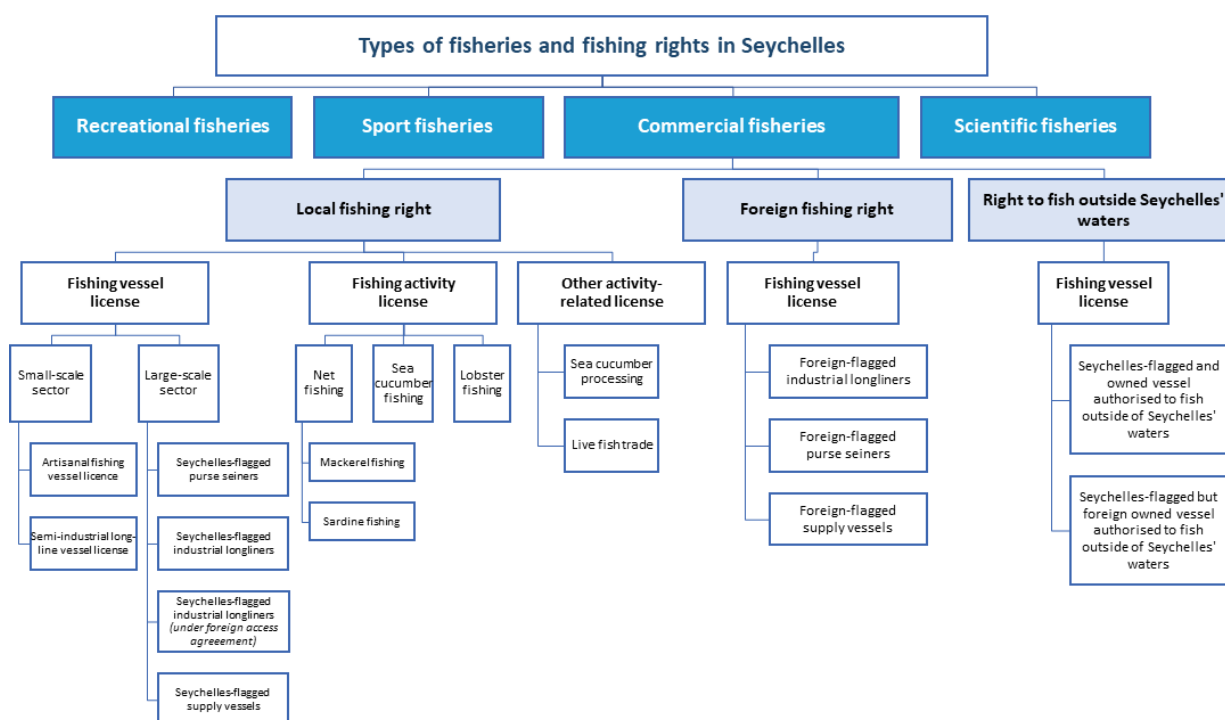
As a general remark, the National MSG states that no summary description of laws and decrees on fisheries tenure arrangements in Seychelles has been published. *Given the complexity of the sector and its several regulations, licence types and corresponding conditions, the lack of an easy-to-understand summary for each type of fishery (as shown below) impacts wider understanding of how the sector works.* As part of this first FiTI Report, the National MSG decided therefore to provide an initial summary and recommends the national authorities to review, amend and publish such a summary online.

In compiling this summary, the National MSG noted that the following three documents are most relevant for understanding Seychelles' tenure system for fisheries:

- the Fisheries Act (2014),
- the Fisheries Regulations (1987)
- the Fisheries Comprehensive Plan (2019), providing an update of fisheries rights, authorisations and procedures applicable to small-scale, but not the large-scale fisheries²³

Types of fisheries and fishing rights in Seychelles

The Fisheries Act (2014) is the main piece of legislation providing rights, authorisations, procedures and dispensation for participating in all types of fisheries. Many of the articles concerning rights and authorisations in the Act are reiterated in the Fisheries Regulations.



Kindly note that the term '*fishing rights*' throughout this FiTI Report includes permits, licences, and authorisations – which are used interchangeably within the Fisheries Act.

²³ <http://www.mofa.gov.sc/about.html>

Recreational fisheries

Recreational fishing has been largely unregulated in Seychelles until 2019. As of today, licences are not required for recreational fishing²⁴ as per Section 21 of the Fisheries Act. However, with the introduction of the ‘Mahé Plateau trap and line fishery co-management plan’ in 2020, a number of measures for managing recreational fishing have been introduced, including:

- A combined demersal species bag limit of 20 fish per person per day;
- A species-specific bag limit of five Bourgeois (*Lutjanus sebae*) and Green jobfish (*Aprion virescens*) per person per day;
- A maximum limit of two fish traps per vessel.

Sport fisheries²⁵

Section 18 (‘application process and requirements for granting of sport fishing permit’) as well as section 19 (‘requirements for the organisation of sport fishing competitions’) are the two main legal provisions under the Fisheries Act that regulate commercial sport fishing in Seychelles.

Permit / authorisation	Fees	Duration	Transferability	Divisibility	Source / Comments
Sport fishing vessel permit	Paid through hire craft licence ²⁶	Per annum	Not transferable	Not addressed. No current restrictions in place.	Article 18 of Fisheries Act (2014)
Organisation of competition sport fishing	No fee in place, but see footnote below	Per competition	Not transferable	Not addressed. No current restrictions in place.	Article 19 of Fisheries Act (2014)

Legally, the main requirements regulating sports fishing as per Seychelles’ Fisheries Act are:

- Application needs to be made to SFA for granting of a sport fishing permit.

²⁴ Defined in the Fisheries Act (2014) as ‘any fishing activity undertaken by a vessel not exceeding 10 metres for recreational purposes which does not involve any commercial activity and result in the trading, offering for sale or selling of fish.’

²⁵ Prior to the introduction of the Fisheries Act in 2014, sport fishing fell under the responsibility of the Ministry responsible for tourism.

²⁶ A Hire Craft licence fee needs to be paid to Seychelles Licensing Authority as per the Schedule Fees of the Licences Act (2010). The Control of Hire Craft Act defines a Hire Craft as ‘a boat let out for hire for fishing as a sport or for pleasure purposes only’, therefore it is implicit that payment of the licence provides hire craft the permission to fish.

Licence fee varies, depending on the length of the vessel, between SCR 500 to SCR 10,000 per annum and between SCR 1,410 to SCR 28,200 if the licence is paid for three years. Section 18 of the Fisheries Act makes provision for a sport fishing permit to be paid to SFA while Section 19 makes provision for a ‘competition sport fishing fee’.

However, at present no fees are being charged by SFA and the vessels are not requiring permission from SFA to fish. SFA states that they are working on a framework to implement such licences.

- Applicants should be able or willing to comply with the terms and conditions of the sport fishing permit.
- The vessel for which a sport fishing permit is sought should have no record of non-compliance with international fisheries conservation and management measures.
- The vessel for which a sport fishing permit is sought should not be included in a list of vessels having engaged in, or supported, illegal, unreported or unregulated fishing established by a Regional Fisheries Management Organisation or any other appropriate regional or international organisation.
- The organisation of sport fishing competitions requires the application of a permit from SFA and payment of a fee.
- Sport fishing and competition sport fishing should not result in the trading, offering for sale or selling of fish. Catch can be used for charitable purposes (sale, donation) with the authorisation of SFA.

Commercial fisheries

The Fisheries Act is the overarching legal framework for commercial fisheries in Seychelles, irrespective of vessel flag, type of vessel, and whether industrial or artisanal. It provides the legal basis for several conditions of fishing licences, such as fees, duration, transferability etc. (as outlined below). Additional conditions can be applied to fishing vessels governed by foreign fishing access agreements (see next chapter).

Prior to documenting the actual parameters for the various commercial fishing rights (i.e. local fishing right, foreign fishing right, right to fish outside Seychelles' waters), the National MSG seeks to highlight several introductory remarks and background information regarding the main licence conditions.

- ➔ **Fees:** The fees that need to be paid for commercial fishing rights are not published online except for net fishing, for which the fee is specified on the SFA website. Sections 16, 18, 25 and 34 of the Fisheries Act (2014) provide the legal mandate for local and foreign vessels to be charged fees to obtain licences and permits to access Seychelles' fisheries. However, the Fisheries Act and Fisheries Regulations only specify the actual monetary value of a licence for certain fisheries (e.g. sea cucumber fishery, live fish trade²⁷), but not for the vast majority.

The actual licence fees that are being charged are published in the Fisheries Comprehensive Plan, but new fees have not been gazetted. In fact, the Fisheries Act does not require that fees are gazetted at all.

After reviewing the different fees for commercial fishing, as part of this FiTI Report, the National MSG notes that there is no ambiguity in the fees paid for fishing rights by local

²⁷ Live fish trade is not legally prohibited but no licences are being issued by SFA.

vessels and for local fishing activities. There is, however, a degree of variation for foreign fishing licences, with annual fees varying from between USD 20,125 – USD 24,000 per year for industrial longline fishing licences and between USD 110,000 – USD 120,000 for foreign purse seine licences (as shown below). This is due to the fact that Seychelles has negotiated different access fees under different fishing agreements.

Furthermore, conflicting information was found regarding the fees chargeable for the *sea cucumber fishery*, as part of this FiTI reporting process. The fee stipulated in the Fisheries Regulations is markedly different from the one stipulated in the Fisheries Comprehensive Plan:

Licence fee for sea cucumber fishing under the Fisheries Comprehensive Plan (2019)	Licence fee for sea cucumber fishing under the Fisheries Regulations (1987) ²⁸
SCR 7,000	SCR 300

It is recognised that these two documents were produced more than 30 years apart. However, the fact that the licence fees stipulated in the Fisheries Regulations have not been repealed and officially replaced by a new fee, published in the Official Gazette, could make the introduction of new fees as part of the Comprehensive Plan contrary to the law.

- **Duration of commercial fishing rights:** Section 22(1) (a) of the Fisheries Act specifically states that fishing licences granted under the Act should be *valid for a period not exceeding twelve months* from the grant date of the licence. As part of this FiTI Report, a sample review of the published information on licence durations by the SFA was conducted. It showed that the licence duration is being respected for all licences issued.

As per Section 23 of the Fisheries Act, licences are *not renewable*. Once a licence expires, a new licence needs to be requested, conducting all of the initial procedures as if the licence was being sought for the first time.

- **Transferability and divisibility of commercial fishing rights:** Licences and permits granted under the Fisheries Act are *not transferable*, except if otherwise prescribed (i.e. for the limitation of entry into a fishery, as per Section 24 of the Fisheries Act). There are no known instances where this has not been respected.

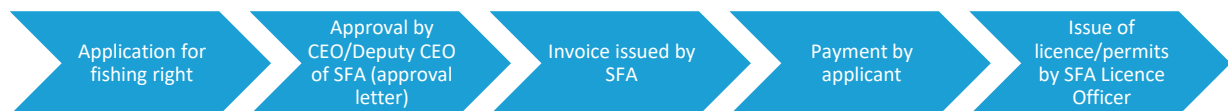
The Fisheries Comprehensive Plan addresses issues of licence *divisibility* for certain fisheries and activities, but not comprehensively. To increase overall understanding around transferability and divisibility of the various commercial fishing rights, information has been summarised in the tables below.

- **The persons legally entitled to issue access rights and fishing authorisations:** The National MSG found no publications from Seychellois authorities pertaining to individual persons that are legally entitled to issue commercial access rights and fishing authorisations. The SFA is the legal authority mandated to issue licences for fishing and

²⁸ Section 19A (4)

fishing-related activities, as per Part III - Licensing Requirement of the 2014 Fisheries Act, excluding processing of fin fish. The authority can authorise for any of its staff to issue such permits and authorisations. The Fisheries Act does not specify that the names of the persons legally authorised to issue licences and permits have to be published. Additionally, the Fisheries Act does not make it mandatory for the SFA to publish details of fishing licences and permits it issues.

At present, the following simplified process needs to be followed to obtain a commercial fishing licence:



➔ **Other conditions applicable to commercial fishing rights:** Conditions applicable to fishing rights are prescribed in Part III of the Fisheries Act (2014), as well as under the Standard Requirements of the Fisheries Regulations (1987). In the following, several key conditions are further elaborated:

- **Transshipment and catch reporting:** There are no specific conditions concerning transshipment and catch reporting for any local fishing licences, except for the lobster fishery²⁹. However, Article 7(2) of the Fisheries Act makes it a requirement for those engaged in fishing and fishing-related activities to provide information regarding their activities (including catch, effort, fishing locations, landing and transshipment) to SFA when requested.
- **Fishing effort:** Only the sea cucumber fishing licences restrict the number of fisher (divers in this case). This also stipulates the opening and closing date for the sea cucumber fishing season. Licence conditions for the net fishery restrict fishing to daytime, between 6 a.m. to 4 p.m.
- **Landings:** All vessels licenced to fish in Seychelles' waters are obliged to land all catches made in Seychelles' waters in Port Victoria or designated landing sites, except if otherwise authorised by SFA. Landings of catches made in Seychelles' waters in foreign ports require permission from SFA.
- **Ecosystem impacts of fishing:** There are no conditions that are specifically related to ecosystem impacts. However, the prohibited use of unauthorised gears as per Section 32(2) of the Fisheries Act, and restrictions in the use of Fish Aggregating Devices (FADs) as per Section 33, directly address such impacts. The Fisheries Act

²⁹ Licence conditions related to catch reporting in the lobster fishery stipulates: i) The Licence must declare their catch through a logbook every two weeks; ii) All log books should be submitted to SFA within one week after closure of the lobster fishing season; iii) The Licence holder will provide access of fisheries technicians to all catches and all reasonable assistance in obtaining data; iv) Provide SFA with access to the receipt book for the sale of every lobster at the closure of the lobster season; v) Agree to be interviewed by SFA fisheries technicians as and when the need arises.

does however provide scope for the authorities to put in place new conditions for issuing of fishing authorisations to further control fishing efforts, reduce ecosystem impacts of fishing and to improve landings, transshipping and catch reporting.

For the small-scale fisheries (i.e. artisanal and semi-industrial longline), the extract of relevant licensing conditions is published in the Fisheries Comprehensive Plan. The Plan also lists the current licence conditions for net fishing (separate conditions for mackerel and sardines), sea cucumber, and lobster fishing and for the processing of sea cucumbers. Furthermore, small-scale fishing vessels (those with autonomous power supply) need to have their Vessel Monitoring System (VMS) operational throughout the whole trip, in order to be entitled to fuel concessions (see 2.10 of this FITI Report).

- ➔ **Oversight and public consultation processes:** This FITI reporting process found no published summary descriptions detailing the nature of any oversight or public consultation processes involved with respect to fisheries tenure arrangements.
 - For *local commercial fishing licences* (as well as *sport fishing licences*), oversight requirements are listed as part of Section 17 and Section 18(5) of the Fisheries Act.
 - For *foreign commercial fishing licences*, oversight requirements are listed under Section 11 and 12 of the Act. Oversight for issuing such licences is usually in the form of ensuring that the vessel does not feature on the list of vessels presumed to have carried out IUU fishing in the IOTC Area of Competence.

The National MSG noted that public consultations have been undertaken as part of the preparation of the 'Mahé Plateau trap and line fishery co-management plan', and its recommended licencing framework. *Though inputs from stakeholders have been recorded in consultancy reports, these reports have not been officially published by the SFA.*

Commercial fisheries – Local fishing licences

Sections 16 and 20 of the Fisheries Act respectively provide the legal basis for licencing of local fishing vessels and fishing activities. Furthermore, section 17 states the legal basis upon which a fishing right may not be granted to a local fishing vessel.

Apart from sea cucumber and lobster fisheries, all other local fisheries have unrestricted number of licences.

The National MSG seeks to highlight that the Fisheries Comprehensive Plan states that '*as a result there is no effective control over the entry of fishermen and extraction of resources, which may result in overcapacity in the fishery.*'

- *Sea cucumber fishery:* The annual number of licences for the sea cucumber fishery has been stable at 25 licences for a number of years³⁰. The individual quota per licence can

³⁰ And 4 licences for processing sea cucumber.

vary on an annual basis, based on the Total Allowable Catch (TAC), as stated in the Fisheries Comprehensive Plan. *Overall, the National MSG determined that there is a significant amount of opacity and restrictive conditions regarding procedures and ownership of sea cucumber fisheries in Seychelles.* For example, the same 25 licence holders can apply for a new licence upon licence expiry, which potentially restricts access of new licence holders to the sea cucumber fishery. Also, the names of the sea cucumber licence holders are compiled by SFA but have previously not been published. In early 2021, the SFA published a list of licenced sea cucumber vessels on its website. *Permission was obtained from the SFA to publish the list of sea cucumber licence holders as part of this FiTI report* (see Annex C). The list indicates that the 25 licences have been issued to both individuals (20; 80% of licences) and businesses (5; 20% of licences). As no beneficial owner information is published for sea cucumber licence holders, it is unclear whether individuals hold multiple licences under different legal ownerships.

Furthermore, while the licence conditions for the sea cucumber fishery are published in the Fisheries Comprehensive Plan, the following aspects are not addressed:

- procedures for applying for a licence;
 - procedures for granting a licence;
 - how the total number of licences is determined; and
 - whether a person/entity can hold multiple sea cucumber licences.
- *Spiny lobster fishery:* The process for getting a licence to participate in the spiny lobster fishery is more transparent than for the sea cucumber. The decision on whether the fishery is opened, the number of licences to be issued and the length of the season is usually made by SFA's Fisheries Management Division, based on the results of annual fishery-independent stock assessments undertaken by the Research Division. The reports of the stock assessments are published on the SFA website (see section 2.4 of this FiTI Report). Once the total number of licences has been determined, the available licences are apportioned among the islands of Mahé, Praslin and La Digue. An open call for application for lobster licences is usually made in the local media (newspapers, radio and television) and licences are issued on a first-come, first-served basis. It is to be noted that one does not have to be a registered fisher to apply for a lobster fishing licence. The list of fishers who were provided with a lobster fishing licence for the 2019/2020 season is published on the website of the Ministry of Fisheries and Agriculture (now known as the Ministry of Fisheries and the Blue Economy, MFBE).³¹

As outlined in the introductory chart of this section, those pursuing commercial fishing activities under local licences need to obtain a vessel licence, as summarised in the table below. Only those pursuing certain fishing-related activities (i.e. mackerel net fishing, sardine net fishing, sea cucumber fishing, lobster fishing) need to obtain an additional fishing-activity licence.

³¹ <http://mofa.gov.sc/downloads/List%20of%20licence%20lobster%20fishers%20for%20the%202019-2020%20fishing%20season.pdf>

Rights	Fees	Duration	Transferability	Divisibility	Source / Comments
Vessel licences					
Artisanal fishing vessel licence	SCR 500	One year	Not transferable ³²	Not specifically addressed ³³ but there are plans to restrict the number of licences issued ³⁴	Stipulated in Section 7A(3)(a) of the Fisheries Regulations (1987) The fee of SCR 500 is maintained in the FCP
Semi-industrial longline vessel licence	SCR 500	One year	Not transferable	Not specifically addressed; there are no individual or collective quota in place for Seychelles' semi-industrial longline fleet	An extract of the existing licence conditions is stated in the FCP
Seychelles-flagged purse seine fishing vessel licence	USD 90,000 ³⁵	Per year	Not transferable	Catch is currently limited for Yellowfin tuna Since 2017, Seychelles has a TAC for Yellowfin equivalent to 85% of Seychelles Yellowfin catch for the year 2014 Seychelles' purse seine quota is divided according to vessel capacity among 13 Seychelles-flagged purse seiners	Stated in FCP Vessel have the option to pay access fee in two equal instalments
Seychelles-flagged supply vessel licence	USD 5,000	Per year	Not transferable	Restrictions apply as per IOTC Resolution 19/01 to reduce the use of supply vessels	Stated in FCP. Verified in the SFA foreign fishing licences payment files

³² Article 24 of the Fisheries Act (2014) states 'a licence or permit granted under this Sub-Part or regulations made under section 20 shall not be transferable except as otherwise prescribed for the limitation of entry into a fishery.' Whereas article 29 states that 'an authorisation shall not be transferred under this Act, regulations made thereunder or a plan for the management of a fishery.' These two articles apply to all fishing licences and permits.

³³ Article 6 of the Fisheries Act (2014) provides the legal framework for introducing quota in any fishery for the purpose of limiting catch or effort.

³⁴ As part of Phase 2 of the implementation of the 'Mahé Plateau trap and line fishery co-management plan', there are plans to develop and implement a fishery licencing framework to enable future effort reduction by controlling the number of licences issued.

³⁵ Can be paid in two equal instalments.

Rights	Fees	Duration	Transferability	Divisibility	Source / Comments
				From 1 January 2018 to 31 December 2019: 1 supply vessel in support of not less than 2 purse seiners, all of the same flag State.	Payment defined in international agreements
Fishing activity licences³⁶					
Mackerel net fishing activity licence	SCR 100	One year	Not transferable	There are no current restrictions on the number of mackerel and sardine net fishing activity licences that can be issued.	Section 10(1) of the Fisheries Regulations makes provision for a net or combination of nets exceeding 50 metres in length to be licenced
Sardine net fishing activity licence	SCR 100	One year	Not transferable	The use of net fishing is restricted only for boats, fishing is restricted to designated areas and between 6 a.m. to 4 p.m.	There are no provisions for nets < 50 m and no fees are stipulated The SCR 100 was introduced in the FCP
Sea cucumber fishing licence	SCR 7,000	One year	Not transferable	Number of licences limited to 25 with a collective quota of 375,000 pieces divided among 3 species (White Teat Fish, Prickly Red Flower Teat Fish) Open season is from November to May annually Licenced vessels need to have a crew of no more than 8 persons, of which only 4 are divers	The SCR 7,000 fee for sea cucumber fishing licence is stipulated in the FCP but in Section 19A(4) of the Fisheries Regulations (1987), the stated fee is SCR 300 There is no evidence that this older fee has been repealed

³⁶ Consequently, for those pursuing a fishing activity listed in this table, two sets of licence fees (vessel licence fee and fishing activity licence fee) are applicable.

Rights	Fees	Duration	Transferability	Divisibility	Source / Comments
Lobster fishing licence	SCR 500	Per open season	Not transferable	Limited entry fishery. Fishery was closed for the 2018/2019 season. For the 2019/2020, only 10 licences were issued. Article 6(2)(g) of the Fisheries Act makes provisions for controlling access.	A licence fee of SCR 500 for one open season along with a refundable compliance bond of SCR 5,000 is stipulated in the FCP.
Other fishing activity-related licences					
Sea cucumber processing licence	SCR 20,000	Per year	Not transferable	Number of licences limited to four.	Stipulated in the FCP.
Licence for live fish trade	SCR 2,000	Per year	Not transferable	Maybe restricted ³⁷ Licences no longer issued	Article 25(A)(7) of the Fisheries Regulations (1987). Live fish trade is not banned, but is no longer permitted in Seychelles.

Commercial fisheries – Foreign fishing licence

Section 11 ('licencing requirements for fishing by foreign fishing vessels') as well as section 12 ('licences to foreign fishing vessels under fisheries agreements') are the two main legal provisions under the Fisheries Act that regulate commercial foreign fishing licences.

Fishing rights for foreign fishing vessels are only issued under international fisheries agreements as stated in section 12 of the Fisheries Act.

Furthermore, the administrative requirements that need to be met for the issuance of a foreign fishing licence are detailed under section 11(6) of the Act.

³⁷ According to Section 25A(6) of the Fisheries Regulations (1987) can be in the form of quotas or on other regulations or management plans in place.

The fishing agreements under which such fishing rights are issued are negotiated by the MFBE, often involving the participation of the Minister and Principal Secretary responsible for fisheries, with data and technical support provided by senior staff of the Ministry and the SFA.

In general, foreign fishing licences are applicable to *foreign-flagged vessels* (as shown in chapter 2.3 of this FiTI Report).

However, *foreign fishing licences can also be applicable to Seychelles-flagged vessels*. In 2019, this was the case for Seychelles-flagged industrial longliners, operating under the foreign fishing access agreements with the Taiwan Deep-sea Tuna Longline Boat Owners and Exporters Association (TTA).

Furthermore, it should be noted that in the case of the *European Union agreement*, the fees for foreign fishing licences (to be paid by shipowners), as stated in the table below, are complemented by an additional overall financial contribution. For 2019, the European Union paid an annual amount of EUR 2,500,000 for access to Seychelles' EEZ³⁸, and an additional EUR 2,500,000 for the support and implementation of Seychelles' sectoral fisheries and maritime policy.

For the other 4 foreign fishing access agreements for 2019 (as shown in the next section), only the fees stipulated in the table below were agreed upon as a compensation for allowing access to Seychelles' EEZ.

Rights	Fees	Duration	Transferability	Divisibility	Source / Comments
Industrial longline fishery					
Foreign-flagged industrial longline fishing licence <i>[Non-EU agreements]</i>	USD 20,125 – USD 24,000	Per year	Not transferable	Not currently limited	Stated in FCP Verified in the SFA foreign fishing licences payment files Payment defined in international agreements
	USD 17,500	Per half-year	Not transferable	Catches of Seychelles-flagged longline vessels is currently less than 5,000 Mt Above this level, IOTC quotas start to apply	
Foreign-flagged industrial longline fishing licence <i>[EU agreement]</i>	EUR 6,750 for vessel below 250 GRT ³⁹ EUR 9,000 for vessel above 250 GRT ⁴⁰	Per year	Not transferable	Fish under the EU's quota for Yellowfin tuna	As per EU/Seychelles Fisheries Partnership Agreement Protocol

³⁸ Equivalent to a reference tonnage of 50,000 tonnes per year.

³⁹ Equivalent of EUR 70 per tonne for 90 tonnes of tuna and tuna like species caught within Seychelles' Fishing Areas.

⁴⁰ Equivalent of EUR 70 per tonne for 120 tonnes of tuna and tuna like species caught within Seychelles' Fishing Areas.

Rights	Fees	Duration	Transferability	Divisibility	Source / Comments
Seychelles-flagged industrial longline fishing licence <i>[Non-EU agreements]</i>	USD 20,125 – USD 24,000	Per year	Not transferable	Not currently limited Catches of Seychelles-flagged longline vessels is currently less than 5,000 Mt Above this level, IOTC quotas start to apply	Stated in FCP Verified in the SFA foreign fishing licences payment files. Payment defined in international agreements.
Purse seiner fishery					
Foreign-flagged purse seine fishing licence <i>[Non-EU agreements]</i>	USD 110,000 – USD 120,000	Per year	Not transferable	Foreign purse seiner fish under their country or block's own quota for Yellowfin tuna	Stated in FCP
Foreign-flagged purse seine fishing licence <i>[EU agreement]</i>	EUR 52,500 (vessel) ⁴¹	Per year	Not transferable	Fish under the EU's quota for Yellowfin tuna	As per EU/Seychelles Sustainable Fisheries Partnership Agreement protocol
Supply vessels					
Foreign-flagged supply vessel licence <i>[All agreements]</i>	USD 5,000	Per year	Not transferable	Restrictions apply as per IOTC Resolution 19/01 to reduce the use of supply vessels From 1 January 2018 to 31 December 2019: 1 supply vessel in support of not less than 2 purse seiners, all of the same flag State	Stated in FCP Verified in the SFA foreign fishing licences payment files Payment defined in international agreements

⁴¹ Equivalent of EUR 70 per tonne for 700 tonnes of tuna and tuna like species caught within Seychelles' Fishing Areas.

Commercial fisheries – Right to fish outside Seychelles’ waters

Section 25 of the Fisheries Act provides the legal basis for the authorisation of *Seychelles-flagged vessels to fish outside Seychelles’ waters* (i.e. in third countries or on the High Seas). The rules and procedures have not been summarised yet by the authorities to facilitate understanding by stakeholders, business partners and the general public.

However, these rules and procedures are collated and well detailed under Sub-part IV of Part III of the Fisheries Act (2014). Authorisation to fish in a third country or on the High Seas is provided through the issuance of a *Certificate of Authorisation* by the Fisheries Management Division of the SFA. Section 25(3) of the Act stipulates ‘*an application to fish outside Seychelles waters shall be made to the Authority in the prescribed form and manner and accompanied with the prescribed fees.*’

There is, however, no officially published information on the fees that need to be paid for such an authorisation, or for the subsequent reporting requirements. The fees that have been charged for 2019 have been compiled in the table below for this FiTI Report.

Provision for the termination of such authorisations are provided under Section 35 of the Fisheries Act (2014).

The National MSG found evidence that 101 vessels were provided authorisation to fish on the High Seas or in a third country’s jurisdictional waters in 2019.⁴²

Rights	Fees	Duration	Transferability	Divisibility	Source / Comments
<u>Seychelles-flagged vessel:</u> Authorisation to fish outside Seychelles’ waters for Seychelles-owned vessels	SCR 500	Per year	Not transferable	Not addressed No current restrictions in place	Article 25, 26, 27 of Fisheries Act (2014) SCR500 fee obtained from the SFA’s MCS division (as no official source published)
<u>Seychelles-flagged vessel:</u> Authorisation to fish outside Seychelles’ waters for foreign-owned vessels	SCR 2,500 or USD 500	Per year	Not transferable	Have to abide by TAC set by IOTC for Yellowfin tuna	Article 25, 26, 27 of Fisheries Act (2014) Stated in FCP Verified in the SFA local fishing licences payment files

⁴² This includes 76 industrial vessels and 25 semi-industrial longliners.

Scientific fisheries

Section 10 of the Fisheries Act provides the legal basis for granting authorisations for scientific research on fisheries. The Fisheries Act does not refer to exploratory fisheries at all.

Scientific fisheries research has traditionally been undertaken by the SFA and its collaborators, such as the French Institut de Recherche pour le Développement and have focused on resources such as deep-water shrimps, deep-water snappers, octopus and scallops. Section 10 of the Fisheries Act makes provision for the SFA to enter into agreements and provide authorisation to vessels, individuals or organisations to engage in fisheries-related research, after having received the approval of the Minister responsible for fisheries.

Rights	Fees	Duration	Transferability	Divisibility	Source / Comments
Authorisation to undertake scientific research on fisheries	No fees stated	As per terms and conditions specified by the SFA.			Article 10 of Fisheries Act (2014)

Other relevant aspects regarding the regulation of Seychelles' fisheries sector:

- **Operation of temporary fish camps:** The Fisheries Act (2014) does not make any provisions for granting of permits and authorisations for the setting up and operation of temporary fish camps.

In the past, there were operations of temporary fish camps in Seychelles' outer islands by island lessees or their subsidiaries, for fishing and the salting of fish. Such temporary fish camps are no longer in operation.

However, operators of outer islands do undertake fishing trips for the subsistence of the workers and guests. The IDC also produces salted fish on some of its islands, which is sold on Mahé.

Apart from the subsistence and sports fishing, a number of IDC islands such as Alphonse, Farquhar, Cosmoledo and Astove also operate catch and release fly-fishing camps through private companies under agreement with IDC. Despite the fact that IDC is a state-owned enterprise, these agreements have not been made public. Other resort islands such as Fregate, North and Denis get the fish they consume from Mahé. Conversely, Bird Island does some fishing for workers and guests while also purchasing some fish from local fisher. The majority of islands that offer charter fishing only operate catch and release programmes. At present, all control of fishing by these entities is voluntary and self-imposed and includes only fishing in designated areas around Aldabra and IDC avoiding fishing activities around grouper spawning aggregation sites during certain years. There is very good monitoring of catch and effort in most of the islands where IDC is present. It is presently not a legal requirement for these island operators to seek permission from the SFA for fishing activities.

- **Access to traditional sites and cultural use:** There are no ‘traditional sites’ in Seychelles related to fisheries, apart from the known fishing ports and landing sites in the districts. As a result, there are no regulations designed to protect access to these sites. As many fishing vessels are accessed from the beaches, the law guarantees free access to all of Seychelles’ beach and, where the beach is enclosed by private property, for the owner to provide reasonable access to the beach.

Recommendations

We, the National MSG, make the following recommendations to improve transparency regarding fisheries tenure arrangements in Seychelles:

ID	Recommendation	Suggested priority	Suggested date for completion
2019-2_1	<i>SFA should publish a summary description of the different types of fisheries that exist in Seychelles, and their corresponding licence arrangements. The National MSG encourages the national authorities to utilise the summaries provided in this FiTI Report as a starting point for this aspect.</i>	High	December 2021
2019-2_2	<i>MFBE should publish in the Official Gazette the fees that need to be paid for all types of fisheries rights existing under the law. This also includes changes to current fee structures.</i>	High	December 2021
2019-2_3	<i>SFA should publish a list of all fisheries permit holders (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).</i>	High	September 2021
2019-2_4	<i>MFBE or SFA should publish online the 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.</i>	High	September 2021

2.3 Foreign Fishing Access Agreements

Transparency requirements	Availability	Accessibility	Completeness
Seychelles must publish the contracts of all foreign fishing access agreements (including their associated protocol(s)),			
that allow access for foreign vessels to fish in Seychelles' marine jurisdictional waters ⁴³	Yes	Partially	Unknown
that allow Seychelles-flagged vessels to fish in a third country or the High Seas ⁴⁴	Yes	Partially	Unknown
Seychelles must publish studies or reports undertaken by national authorities or foreign parties to an agreement providing evaluation or oversight of the agreement, if available, including those that describe the number of fishing authorisations issued, the reported catch of these vessels and any assessment of compliance with the terms and conditions of the agreement.	Yes	No	Unknown
Documentation derived from any national stakeholder consultation undertaken with respect to the preparation, negotiation or monitoring of the agreements must be published, if available.	No		

In 2019, Seychelles had *5 agreements that allowed foreign vessels to fish in its waters*, and *2 agreements that allowed Seychelles-flagged vessels to fish in third country's waters*.

Signatory party	Agreement published online by Seychelles government?	Evaluation of agreement conducted?	Evaluation published online by Seychelles government?
Access agreements for foreign-flagged vessels to fish in Seychelles' waters			
European Union	No	Yes	No
Mauritius	Yes	No	
Taiwan Deep-sea Tuna Longline Boat Owners and Exporters Association (TTA)	No	No	
Top Fortune International (TFI)	No	No	
Dongwon Industries Co. Ltd	No ⁴⁵	No	

⁴³ It should be noted that foreign fishing access agreements do not grant access to Seychelles' territorial sea at all.

⁴⁴ Agreement for Seychelles-flagged vessels to fish on the High Seas is not relevant for Seychelles at the time being.

⁴⁵ There appears to be no written agreement with Dongwon Industries Co. Ltd to fish in Seychelles' waters.

Signatory party	Agreement published online by Seychelles government?	Evaluation of agreement conducted?	Evaluation published online by Seychelles government?
Access agreements for Seychelles-flagged vessels to fish in other countries' waters			
Mayotte (EU)	No	No	
Mauritius	Yes	No	

The agreement and protocol between the EU and Seychelles and between Mayotte (EU) and Seychelles, along with European Council Regulations concerning the conclusion of the agreements, are accessible on the EU website⁴⁶, but not on a website of the government of Seychelles.

During this FiTI reporting process, SFA published both access agreements with the government of Mauritius, which allow Seychelles-flagged vessels to fish in Mauritian waters and Mauritius-flagged vessels to fish in Seychelles waters.

The current agreement with the Taiwan Deep-sea Tuna Longline Boat Owners and Exporters Association (TTA) and Top Fortune Agreement (TFI) both have articles which prevents the Seychelles from divulging content of the agreements without the prior knowledge and written approval of the other party. The Government endeavours to remove such confidentiality clauses from future fisheries access agreements.



The National MSG recognises the often misinformed public debates concerning these foreign access agreements. Therefore, for each of the active agreements in 2019, the key information has been summarised in a tabular form in Annex C.

Evaluation of these agreements:

Only the EU-Seychelles agreement has been subject to an evaluation. In 2016, a report was prepared entitled '*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*'. The 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. **This report is not publicly available on a website of Seychelles' government.**⁴⁷

⁴⁶ <https://bit.ly/2KsEwNb>

⁴⁷ A similar report was prepared in 2021 entitled '*Performance audit evaluation of the implementation of the sectoral support provided under the 2014-2020 protocol of the EU/Seychelles Fisheries Partnership Agreement*', which 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.

It needs to be emphasised that this report has not assessed the level of compliance with the terms and conditions of the fisheries agreements. As part of this FiTI reporting process, the MFBE indicated that a mechanism is being established for improved monitoring of sectoral support under the protocol of the EU/Seychelles Sustainable Fisheries Partnership Agreement. No evaluation has been conducted for any of the other agreements to date.

National stakeholder consultation

No documentation derived from national stakeholder consultations regarding the preparation, negotiation or monitoring of these foreign agreements has ever been collated or published by the government of Seychelles. As part of this FiTI reporting process, the MFBE indicated that, until 2019, all discussions undertaken prior to renegotiation and signing of new foreign fisheries access agreements have been done primarily within the government, through the involvement of different governmental ministries and agencies. Representatives of local fisher were only consulted in certain cases. *Despite the fact that the MFBE stated that minutes of these discussions have been recorded, no information has been published so far.*

Recommendations

We, the National MSG, make the following recommendations to improve transparency regarding foreign fishing access agreements:

ID	Recommendation	Suggested priority	Suggested date for completion
2019-3_1	<i>MFBE should publish online all foreign fishing access agreements and associated protocols.⁴⁸</i>	<i>High</i>	<i>December 2021</i>
2019-3_2	<i>MFBE should publish online all studies or reports related to the evaluation or oversight of these agreements, which have either been undertaken by national authorities or foreign parties.</i>	<i>High</i>	<i>December 2021</i>
2019-3_3	<i>SFA should publish any assessment regarding compliance of fishing vessels with the terms and conditions set forth in their respective access agreement, once available.</i>	<i>Medium</i>	<i>September 2021</i>
2019-3_4	<i>MFBE should publish information from previous (prior to 2019) and recent national stakeholder</i>	<i>Medium</i>	<i>December 2022</i>

⁴⁸ In case an agreement or expectation of confidentiality exists between the parties to an agreement, these agreements must be made public within 3 years from becoming a FiTI Candidate country (i.e. in Seychelles' case, latest until March 2023).

	<p><i>consultations undertaken with respect to the preparation, negotiation or monitoring of foreign fishing access agreements.</i></p> <p><i>Information related to future national stakeholder consultations should be published in a timely manner.</i></p>		
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2.4 The State of the Fisheries Resources

Transparency requirements	Availability	Accessibility	Completeness
Seychelles must publish the most recent national reports on the state of fish stocks	Yes	No	No
Including any information on trends in the state of stocks and conclusions on the reasons for change.	Yes	No	No
Studies or reports undertaken by national authorities that assess the sustainability of fishing.	Yes	No	No
Information on the methods and data used to assess fish stocks must be described.	Yes	No	No
Information on ongoing or planned efforts to update and expand fish stock assessments must be described.	No		

The National MSG did not find any consolidated national report on the state of fish stocks in Seychelles.

Furthermore, Seychelles' government has published only one report on the state of fisheries resources online (relevant for the calendar year 2019, as part of the FiTI reporting process): [Spiny lobsters around Seychelles' principal island of Mahé](#).

The National MSG noted that the SFA has produced a stock assessment summary report for the artisanal fishery. This report covers the calendar years 2016-2018, and was presented in 2019 to the Scientific Sub-Committee of the British/Seychelles Fisheries Commission (BSFC). *However, this report has not been published yet.*

In order to increase the availability and understanding of the status of fish stocks in Seychelles, the existing reports and information, as provided by the SFA as part of this FiTI reporting process, are briefly summarised:

- **Demersal fishery:** Internal stock assessments (conducted by SFA staff) were undertaken in 2019 for the three main indicator species using length base stock assessment techniques:
 - Emperor red snapper (*Lutjanus sebae*),
 - Brown-spotted grouper (*Epinephelus chlorostigma*),
 - Green jobfish (*Aprion virescens*).

The results of the stock assessments were presented during the above cited BSFC meetings in September 2019. The assessment supported results of earlier assessments undertaken in 2018 using the weight of evidence approach which suggested that the stock of all three species is overfished and that the stock of Emperor red snapper is subjected

to overfishing. The 2018 assessment also indicated that the stock of Rabbitfish (Siganidae) principally represented by three species comprising of the shoemaker spinefoot (*Siganus sutor*), streamlined spinefoot (*Siganus argenteus*) and blue-spotted spinefoot (*Siganus corallinus*) was not overfished or subjected to overfishing. **This report has not been published yet.**

- **Lobster:** A lobster stock status report was produced in 2019 based on annual surveys. The report recommended that the lobster fishery be opened for a period of three months for the 2019-2020 season and for the number of licences to be capped at 16.
- **Sea cucumber:** An assessment of Seychelles' sea cucumber fishery was undertaken in 2017 using biomass-based surplus production models by a United Kingdom-based Marine Resources Assessment Group (MRAG). The study found that for all reference cases examined, there was evidence of population decline in the sea cucumber stocks and that population sizes had been reduced significantly from its pre-exploited state. Projections using future catches also showed that reduction or capping of catches might be advisable. The study made recommendations for strengthening data collection from the fishery, especially with regards to recording the weight of individual sea cucumbers caught in the fishery, the need to collect fishery-independent data and to better understand the biology of the sea cucumber species targeted. **This report has also not been published by the SFA.**
- **Semi-pelagic species:** Stock assessments were undertaken on the following three species of semi-pelagics:
 - Yellowspotted trevally (*Carangoides fulvoguttatus*),
 - Bludger (*Carangoides gymnostethus*),
 - Kawakawa (*Euthynnus affinis*)

The assessment found the stock of the first two species of trevally to be overfished but not subjected to overfishing, while the Kawakawa was not overfished or subjected to overfishing. **This information was part of the stock assessments presented during the BSFC meetings, and thus has not been published yet.**



The National MSG acknowledges the importance of information on stock status and has therefore included a summary table of the latest available information for the species mentioned above (for the calendar year 2019) in Annex C.

- **Tuna and tuna-like species:** As shown in the graphic in the summary section, assessments of tuna and tuna-like species targeted by the industrial longline and purse seine fishery are not undertaken by the government of Seychelles, but by the Indian Ocean Tuna Commission (IOTC). Stock status for 22 species is available from the IOTC website⁴⁹.

⁴⁹ <https://iotc.org/node/3379>

Seychelles contributes to these stock assessments through the provision of sampling data collected during landing and transshipments. The latest stock status determination, based on the 2016 assessment, indicated very high probability that the stock of Yellowfin tuna (*Thunnus albacares*) is overfished and is subjected to overfishing, while the stock of the three main other tuna species Albacore (*Thunnus alalunga*), Big eye (*Thunnus obesus*), and Skipjack (*Katsuwonus pelamis*) are neither overfished nor subjected to overfishing.

For Billfish, the IOTC stock assessment indicated that the stocks of the Indo-Pacific sailfish (*Istiophorus platypterus*) and the Blue marlin (*Makaira nigricans*) are both subjected to overfishing despite the fact that the stocks themselves are not overfished. Meanwhile, the stock of the Striped marlin (*Tetrapturus audax*) was overfished and subjected to overfishing. The IOTC has published their schedule of future stock assessments up to 2023 on their website⁵⁰. For the latest stock status information for species under the IOTC management mandate, please refer to the IOTC Stock Status Dashboard⁵¹.

Recommendations

We, the National MSG, make the following recommendations to improve transparency regarding the state of marine fisheries resources in Seychelles:

ID	Recommendation	Suggested priority	Suggested date for completion
2019-4_1	<i>SFA should publish the reports and the results of all stock assessments undertaken in the last four years on their website.</i>	<i>High</i>	<i>June 2021</i>
2019-4_2	<i>SFA should prepare and publish a periodic report (e.g. biennially) on the state of the main commercial fish stocks in Seychelles.</i>	<i>High</i>	<i>December 2022</i>
2019-4_3	<i>SFA should publish on its website any future fish stock assessment programmes it is planning to undertake, and the research that is needed to support these assessments.</i>	<i>High</i>	<i>December 2021</i>

⁵⁰ https://iotc.org/sites/default/files/documents/science/Schedule_of_stock_assessments_for_IOTC_species.pdf

⁵¹ <https://iotc.org/node/3379>

2.5 Large-Scale Fisheries

2.5.1 Vessel Registry

Transparency requirement	Availability	Accessibility	Completeness
Seychelles must provide an online, up-to-date registry of all Seychelles-flagged and foreign-flagged large-scale vessels authorised to fish in the country's marine jurisdictional waters, and of all Seychelles-flagged large-scale vessels authorised to fish in third countries' marine jurisdictional waters and on the High Seas, including the following information:	Yes	No	No
i. The name of the vessel	Yes	No	Yes
ii. The legal owner of the vessel, including their address and nationality	Yes	No	Yes
iii. The registered port of the vessel	Yes	No	Yes
iv. The flag State of the vessel	Yes	No	Yes
v. The vessel's unique identification number(s)	Yes	No	Yes
vi. The type of vessel, according to fishing gear or fishing method, following the definition set in the country's legislation	Yes	No	Yes
vii. The physical characteristics of the vessel, e.g. length, beam, tonnage, engine power	Yes	No	Yes
viii. The name of the vessel's agent, if applicable	Yes	No	Yes
ix. The access agreement under which the vessel is granted authorisation to fish, if applicable	Yes	No	Yes
x. The type of fishing authorisation held by the vessel	Yes	No	Yes
xi. The quantity and names of target species, permissible by-catch and discards that the vessel is authorised to fish, if specified in the vessel's fishing authorisation	Yes	No	No
xii. The duration of the fishing authorisation, indicating start and end date	Yes	No	Yes
xiii. The rights holder for whom the vessel is fishing, if applicable, including the name and nationality of the rights holder	Yes	No	Partially
xiv. The country and/or regions of the High Seas where the vessel is authorised to fish (applicable for Seychelles-flagged vessels operating in third countries or on the High Seas)	No	No	No

The National MSG found that Seychelles does not have an online registry of large-scale vessels authorised to fish in its waters.

However, SFA has a vessel registry in its own records (but not published).

Furthermore, this SFA-internal registry includes 12 of the 14 vessel registration attributes that are required by the FiTI Standard. These 12 registration attributes are collected each time a large-scale fishing vessel (both foreign and Seychelles-flagged) makes an application for a fishing licence. This information is captured in the 'Application for Fishing Licence Form' and application approval letter. The majority of the information from this form is then entered into the Foreign Fishing Licence Access Database, which also includes data on Seychelles-flagged large-scale fisheries vessels. The two other attributes are stipulated for Seychelles-flagged vessels in their formal letter of authorisation to fish. These attributes have not been captured in the Foreign Fishing Licence Database and the physical files containing letters of authorisation were not made available for verification as they had been infected with a mould.

During this FiTI reporting process, the National MSG found that the Foreign Fishing Licence Database had significant gaps in information regarding the 12 collected vessel registration attributes. The database contained a list of 170 licenced vessels with registration attributes for the year 2019, whereas the Seychelles Fisheries Statistical Report indicates 248 vessels were licenced to fish in Seychelles' waters in 2019. As a result, the vessel registration attributes for all the large-scale vessels licenced to fish in Seychelles' waters for the year 2019 could not be accurately verified.

According to SFA, an online Vessel Registry and Licence Database for the registration of all types of fishing vessels (both foreign and local) is currently being prepared. The registry was supposed to have been completed by mid-2020 but was still not ready at the time of completion of this report. This online Vessel Registry is being designed to record information on vessels registered and licenced to fish in Seychelles' water as well as those that regularly use Seychelles' ports, in addition to local fishing vessels, including those involved in the recreational fishery. There are plans to make this online registry public. The proposed registry is supposed to link with a proposed SFA Compliance Database, which will also be shared with other security and management organisations. It is unlikely that the Compliance Database will be made public due to the sensitivity of its content. SFA anticipates that the launching of the system will contribute to the greater implementation of the country's port state measures as required by the IOTC and the Southwest Indian Ocean Fisheries Commission (SWIOFC).

It is to be noted that *SFA is legally mandated to keep an updated record of licenced fishing vessels* as per the requirement of Section 8 of the Fisheries Act, which states that '*the Authority [SFA] shall make and maintain a Record of fishing vessels that have been granted a licence, permit or an authorisation under this Act and take all measures to ensure that all such fishing vessels are entered in the Record of fishing vessels.*'

All 76 Seychelles-flagged large-scale vessels were authorised to fish in third countries' marine jurisdictional waters and on the High Seas.

Flag State	Large scale vessels licenced to fish in Seychelles' waters in 2019			
	Longline	Purse seiner	Supply vessel	Grand Total
Taiwan (POC)	84	0	0	84
Seychelles	57	13	6	76
China	44	0	0	44
Spain	0	15	6	21
France	1	11 ⁵²	2	14
Mauritius	0	3	1	4
Korea	0	2	1	3
Italy	0	1	1	2
Grand Total	186	45	17	248⁵³

Based on the verification of 170 vessel records within the SFA-internal registry, the National MSG noted the following with respect to the 14 FiTI vessel registry requirements:

- i. *The name of the vessel:* Names of vessels were always provided.
- ii. *Legal owner, address and nationality:* All licenced vessels authorised to fish in Seychelles' jurisdictional waters, third countries' marine jurisdictional waters and on the High Seas had records of legal owners' name and address, but not nationality.

However, 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 (2014) which states '*the Record of fishing vessels shall contain the name, address and nationality of any person with beneficial ownership of the fishing vessel.*'

- iii. *Registered port of the vessel:* All licenced vessels authorised to fish in Seychelles' jurisdictional waters, third countries' marine jurisdictional waters and on the High Seas in 2019 had records of the registered port of the vessel.
- iv. *Flag State of the vessel:* All licenced vessels authorised to fish in Seychelles' jurisdictional waters, third countries' marine jurisdictional waters and on the High Seas in 2019 had records of the flag State of the vessel.
- v. *The unique identification number(s) of the vessel:* Unique vessel identification numbers that are recorded by the SFA include: Vessel Registration Number, Licence number,

⁵² Note that in 2019 one vessel changed flag from France to Mauritius. In Table 4 this vessel is assigned only to Mauritius.

⁵³ Out of the 248 large-scale vessels licenced to fish in Seychelles' waters in 2019, 166 were active (104 industrial longliners, 45 purse seines, 17 supply vessels).

International radio call sign (IRCS), IOTC registration number, Organization for the Promotion of Responsible Tuna Fisheries (OPRT) number and International Maritime Organisation (IMO) number. The unique identification number of Seychelles-flagged large-scale fishing vessels authorised to fish in third countries' marine jurisdictional waters and on the High Seas provided through the certificate of authorisation is recorded. The two unique identification numbers that were provided by all vessels are the vessel registration number and the IRCS.

- vi. *Type of vessel*: There are three categories of large-scale licenced fishing vessel: purse seiners, industrial longliners and supply vessels. All licenced vessels were assigned to one of the three types of vessels categories defined above.
- vii. *Physical characteristics of vessels (length, beam, tonnage and engine power)*: Information collected by SFA includes vessel length (m), vessel width (m), Gross registered tonnage (GRT), Net registered tonnage (NRT), engine type and horse power. Of the 170 vessels whose records were available for verification, the following number had details of:
 - Vessel length: 168
 - Vessel width: 126
 - Gross registered tonnage: 161
 - Engine (type) and power: (131) 130

The record file also includes one or more pictures of each licenced vessel.

- viii. *Name of the vessel's agent (if applicable)*: All foreign-owned licenced vessels had record of the vessel's local agent. This is a requirement as per Section 11(6a) of the Fisheries Act.
- ix. *Access agreement for granting of authorisation*: All foreign-flagged licenced vessels had record of the access agreement under which authorisation to fish was granted.
- x. *Type of fishing authorisation*: Authorisations are provided for purse seiners, industrial longliners or supply vessels. All licenced vessels had a type of fishing authorisation assigned. The licence approval letter for all support vessels stipulates that the vessel is not allowed to catch any fish but is to assist licenced or authorised fishing vessels with their fishing operations. Authorisations for supply vessels also contain the list of fishing vessels it can assist and includes the name of said fishing vessel, as well as its fishing licence number.
- xi. *Quantity and names of target species, permissible by-catch and discards*: All licenced vessels were authorised to target tuna and tuna-like species. The available quota of yellowfin tuna for Seychelles-flagged purse seiners is distributed equally among vessels.
- xii. *Duration of the fishing authorisation, indicating start and end date*: There are records of licence duration, including start and end dates, for all licenced vessels.

- xiii. *Rights holder (including name and nationality)*: This information was captured as the company who owns the vessel which has been licenced to fish. The right to fish is however assigned to the vessel and not the company. All licenced vessels had information on the name of the vessel owner and the port and country of registration.
- xiv. *Country and/or regions of the High Seas where fishing is authorised*: The information is available in hard copy files at SFA. Files could not be verified due to infestation with a mould.

Recommendations

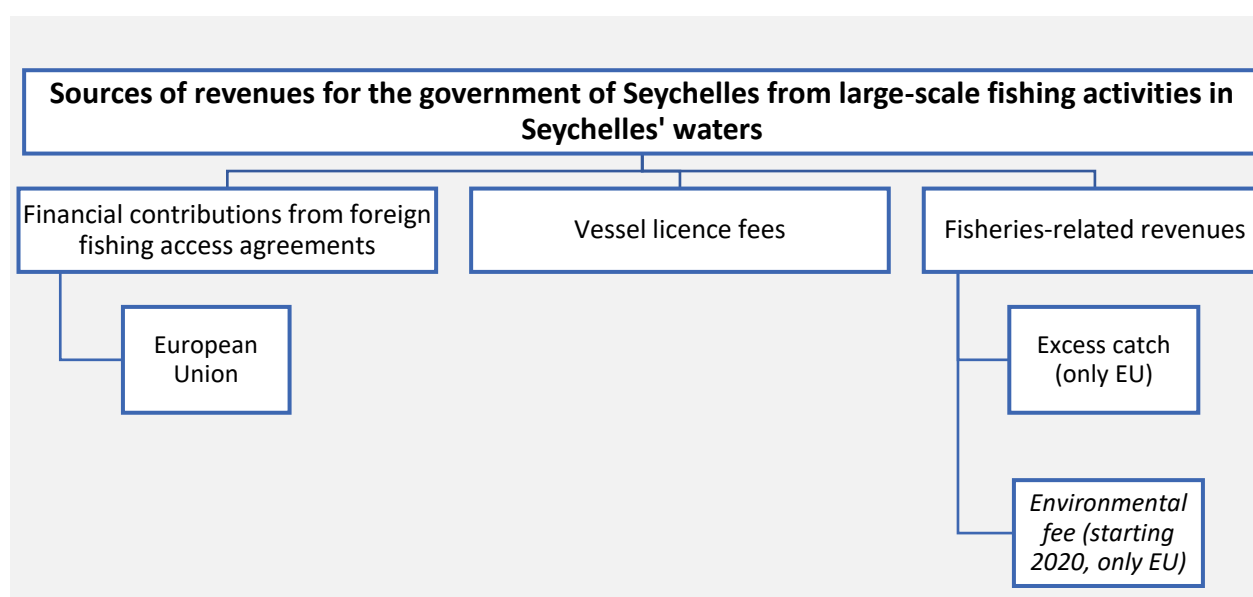
We, the National MSG, make the following recommendations to improve transparency regarding the country's large-scale vessel registry:

ID	Recommendation	Suggested priority	Suggested date for completion
2019-5_1	<i>SFA should publish an up-to-date, online registry of all Seychelles-flagged and foreign-flagged large-scale vessels authorised to fish in Seychelles' marine jurisdictional waters, and of all Seychelles-flagged large-scale vessels authorised to fish in third countries' marine jurisdictional waters and on the High Seas. The vessel registry must include all 14 vessel attributes, as defined in the FiTI Standard.</i>	<i>High</i>	<i>September 2021</i>
2019-5_2	<i>This online vessel registry, once published, should be linked to relevant parameters and conditions of the underlying licences (e.g. licensing period, fees paid, species to be taken, areas to be fished, etc.).</i>	<i>High</i>	<i>September 2021</i>

2.5.2 Payments for fishing

Transparency requirements	Availability	Accessibility	Completeness
Seychelles must publish accessible and complete information on payments made by each vessel listed in the vessel registry for their fishing activities:	Yes	No	No
i. The name of the natural person or legal entity that made the payment.	Yes	No	No
ii. The name of the national authority who received the payment.	Yes	No	Yes
iii. The date on which payment was received by the national authority.	Yes	No	No
iv. The purpose of the payment.	Yes	No	Partially

Given the economic importance of fisheries for Seychelles, the National MSG has outlined this brief (and simplified) illustration of the various direct revenue sources provided to government by large-scale fishing vessels:



The government of Seychelles has not published online any information on payments made by large-scale fishing vessels for the year 2019. However, this information is collated by SFA and is kept in an accounting software and on physical files.

Given that the SFA-internal vessel list comprises only of 170 vessels, the National MSG was unable to verify whether all 248 large-scale fishing vessels licenced to fish in Seychelles' water in 2019 had paid their licence fee for fishing activities in the calendar year 2019.

Out of the 170 vessels, it was shown that 142 vessels had made their payments before their licence start date. It was a challenge to verify whether all licence payments had been received, as in many cases the licences for several vessels were paid together. Furthermore, in several instances the amount of money that entered the account was over or under the required fee,

as licence holders had not considered relevant bank charges. In the majority of instances when payment was higher, proof was given that SFA followed up and the differences were settled.

The National MSG also made the following observations:

- *The name of the natural person or legal entity that made the payment:* The information on the natural person or legal entity making payments for large-scale fishing activities is being erroneously collated by SFA. Instead of recording the name of the companies making the payment for licence fees in their accounting software, the name of the vessel's local agent, to which receipts are sent, is recorded. There were indeed some cases when payments were made by the local agents. However, in the majority of cases, payments came directly from the vessel operators or the association of vessel owners.
- *The name of the national authority who received the payment:* The National MSG was able to verify payments for the 142 vessels for which access to the payment file had been granted. It was determined that in the majority of instances, payments were made through the Central Bank of Seychelles (CBS). All payments made through CBS were then transferred to the SFA's bank account. In a small number of cases, payments were made directly into the SFA's bank account. Payments were made either in EURs or USDs, based on the currency of the agreements. The payment was automatically converted into Seychelles Rupees, since the SFA's account is in rupees.
- *The date on which payment was received by the national authority:* The current SFA record does not include the date on which payment was received, but instead the date on which the receipt for the payment was made (which could be a few days after). One discrepancy was encountered where the same payment had two receipts with different numbers. When queried, the SFA responded that in 2019 they were in the process of changing the way that they issue receipts and as a result had to re-post certain receipts.
- *The purpose of the payment:* The Accounts Section of SFA keeps a record of the purpose of payments made by vessels for fishing activities. All bank transfer and other payment notifications that the National MSG was able to verify in the SFA file for 2019 stated that payment was for *licence fees* and was followed by the SFA-assigned vessel number. There were several instances when payments had been made for more than one vessel and, in all cases, all SFA licence numbers were included in the bank transfer notification that was transmitted by the CBS or local commercial banks.

Payments of *port fees* are not available on a per vessel basis to the fisheries authorities, as it resides with the Seychelles Port Authority – only aggregated data is transferred to SFA.⁵⁴

⁵⁴ Transshipment and landing fees are collected at a rate of USD 4 per tonne by the Seychelles Port Authority.

Recommendations

We, the National MSG, make the following recommendations to improve transparency regarding payments from large-scale vessels for fishing activities:

ID	Recommendation	Suggested priority	Suggested date for completion
2019-5_3	<i>SFA should publish on its website, on an annual basis, all payments (e.g. for fishing licence, certificate of authorisation, excess catch, and environmental fee) on a per vessel basis made by large-scale fishing vessels, including the four information requirements of the FiTI Standard.</i>	High	June 2022

2.5.3 Recorded catch data

Transparency requirements	Availability	Accessibility	Completeness
Seychelles must publish the following information from vessels listed in its vessel registry:			
i. <i>Catches by Seychelles-flagged vessels</i> : The quantity of annual recorded retained catch according to species or species groups, as well as marine jurisdictional waters, High Seas and third country waters	Yes	Yes	Partially
Disaggregated by fishing authorisations or gear type	Yes	Yes	Partially
Disaggregated by marine jurisdictional waters, High Seas and third country waters	Yes	Yes	Partially
ii. <i>Catches by foreign-flagged vessels</i> : The quantity of annual recorded retained catch according to species or species groups	Yes	Yes	Partially
Disaggregated by fishing authorisations or gear type	Yes	Yes	Partially
Disaggregated by flag State	Yes	Yes	Partially
iii. <i>Landings in national ports</i> : The quantity of annual recorded landings in national ports according to species or species groups caught in the country's marine jurisdictional waters	Yes	Yes	Partially

Disaggregated by fishing authorisations or gear type	Yes	Yes	Partially
Disaggregated by flag State	Yes	Yes	Partially
iv. <i>Transshipments and landings in foreign ports</i> : 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	Yes	Yes	Partially
Disaggregated by fishing authorisations or gear type	Yes	Yes	Partially
Disaggregated by flag State	Yes	Yes	Partially
Seychelles must publish information on recorded quantities of <i>discards</i> according to species or species groups.	Yes	Yes	Partially
Disaggregated by fishing authorisations or gear type	Yes	Yes	Partially
Disaggregated by flag State	Yes	Yes	Partially
Seychelles must publish the most recent studies and reports on recorded <i>fishing effort by vessels</i> , disaggregated by fishery or gear type and by flag state, if available.	Yes	Yes	Partially
Seychelles must publish evaluations or audits of the <i>economic, social and food security contribution</i> of the large-scale fishing sector, if available.	Yes	Partially	No

➔ **Catches of Seychelles-flagged vessels:** Data on retained catches made by active Seychelles-flagged large-scale fishing vessels for 2019 is available online, published in the Fisheries Statistical Report (2019). The available catch data is summarised below, disaggregated by species and geographical areas.⁵⁵


However, the data is incomplete. While catch data from all Seychelles-flagged purse seiners is provided for the entire calendar year 2019,

- catches made by the industrial longline fishery during Semester 2 (July – December 2019)⁵⁶ is missing completely, and
- the catches made by the industrial longline fishery for Semester 1 (January – June 2019) is based only on 91% logbook returns. Published historical catch data from the industrial longline fishery showed that reported catches have always been below actual catches, as logbook returns have never been at 100%. It is noteworthy

⁵⁵ Note that figures have been rounded to the nearest Mt.

⁵⁶ SFA stated that it was unable to publish catch data for Semester 2 (July to December 2019) for the industrial longline fishery as a result of internal administrative issues and technical issues with the FINSS software, which is used for the management of data from the industrial longline fishery.

that SFA does not extrapolate nominal catch data to compensate for unreturned logbooks to estimate an annual total catch from this fishery.



Species	Catches in Seychelles EEZ (Mt)		Catches in foreign EEZs (Mt)		Catches on the High Seas (Mt)		Total catches (Mt)	
	Purse seiners	Long-liners	Purse seiners	Long-liners	Purse seiners	Long-liners	Purse seiners	Long-liners
Yellowfin	6,643	297	6,214	1,298	20,149	2,240	33,006	3,835
Skipjack	10,138		14,605		48,174		72,917	
Bigeye	1,290	182	1,782	309	3,467	1,311	6,539	1,802
Albacore	9		1		4		14	
Swordfish		56		218		804		1,078
Marlin		30		55		275		360
Sharks		57		99		366		522
Others	8	32	8	145	130	1,703	146	1,880
Total	18,088	654	22,610	2,124	71,924	6,699	112,622	9,477

Furthermore, an analysis of the annual retained catch data for Seychelles-flagged large-scale fishing vessels showed the following:

- *Purse seiner fishery*: The published retained catch data is [disaggregated](#) by a number of attributes, fulfilling the requirements of the FiTI Standard. Disaggregation includes:
 - by month, quarter, semester,
 - target species (i.e. Yellowfin, Skipjack, Bigeye, Albacore, others),
 - geographical area (Seychelles EEZ, foreign EEZ (not further defined) or the High Seas),
 - whether the catch has been made in a free swimming school, is FAD-associated or unidentified.
- *Industrial longline fishery*: The published retained catch data is also [disaggregated](#) by a number of attributes, albeit less than for the purse seiner fishery, fulfilling the requirements of the FiTI Standard. Disaggregation includes:
 - by month,
 - by target species or species groups (i.e. Yellowfin, Bigeye, Swordfish, Marlin, Sharks, others),
 - by geographical areas (Seychelles EEZ, foreign EEZ (not further defined) or the High Seas).

- ➔ **Catches of foreign-flagged vessels:** Data on retained catches made by active foreign-flagged large-scale fishing vessels for 2019 is available online, published in the Fisheries Statistical Report (2019).
- **Purse seiner fishery:** The published catch information from all foreign-flagged purse seiner vessels *is perceived as nearly complete*. Catches made in 2019 are summarised below (in Mt), disaggregated by species, flag States and geographical area.


Species	Catches in Seychelles' EEZ	Catches in other EEZs & High Seas, <i>calculated values</i> ⁵⁷	Total Western Indian Ocean catches
Spanish-flagged vessels			
Yellowfin	8,877	38,344	47,221
Skipjack	14,737	102,954	117,691
Bigeye	3,352	7,446	10,798
Albacore	34	7	41
Others	0	418	418
Spanish catch (Mt)	27,000	149,169	176,169
French-flagged vessels			
Yellowfin	11,437	15,181	26,618
Skipjack	11,120	29,000	40,120
Bigeye	1,718	1,999	3,717
Albacore	31	25	56
Others	136	381	517
French catch (Mt)	24,442	46,586	71,028
Other-flagged vessels			
Yellowfin	9,012	13,050	22,062
Skipjack	5,174	16,228	21,402
Bigeye	1,288	1,819	3,107
Albacore	38	9	47
Others	11	9	20
Others catch (Mt)	15,523	31,115	46,638
Total catch (Mt)	66,965	226,870	293,835

⁵⁷ Note that 'Catches in other EEZs & High Seas' is not published separately in the Fisheries Statistical Report and had to be calculated by subtracting Seychelles EEZ catch from Western Indian Ocean catch.

In addition to the above-shown disaggregation according to flag States (i.e. Spain, France, Others⁵⁸), species and geographical areas (i.e. Seychelles EEZ, Western Indian Ocean (inclusive of Seychelles)), the published catch is further [disaggregated](#) by several attributes, fulfilling the requirements of the FiTI Standard:


- by month, quarter, semester,
 - whether the catch has been made in free swimming school, is FAD associated or unidentified, and
 - the agreement under which the access regime is defined (EU, others).
- **Industrial longline fishery:** The published retained catch data for the foreign-flagged longline fishery is again *incomplete*, as it
- covers only Semester 1 data (Seychelles- and Taiwan (POC)-flagged vessels) and Quarter 1 data (other flagged-vessels), and
 - this quarterly information is based only on 81% logbook returns from foreign-flagged longliners.⁵⁹

Catches made by foreign-flagged longliners made in the first quarter of 2019 are summarised below (in Mt), disaggregated by species and geographical area.

	Catches made in Seychelles' EEZ	Catches made in other EEZs & on the High Seas	Total Western Indian Ocean catches
Taiwan (POC)			
Yellowfin	654.6	86.6	741.2
Bigeye	460.2	105.8	566.0
Swordfish	149.7	37.9	187.6
Marlin	102.4	20.4	122.8
Sharks	268.6	22.3	290.9
Others	99.8	13.2	113.0
Taiwan (POC) catch	<u>1,735.3</u>	<u>286.2</u>	<u>2,021.5</u>
Others			
Yellowfin	59.1	0.4	59.5
Bigeye	30.3	0.1	30.4
Swordfish	14.2	0.1	14.3
Marlin	12.9	0.5	13.4
Sharks			0.0

⁵⁸ 'Others' include Italy (one vessel), Mauritius (two vessels) and South Korea (two vessels).

⁵⁹ As industrial longline fishery catch data is documented in the same FINSS software as catch data for Seychelles-flagged vessels, the reasons for the incomplete data sets are similar.

	Catches made in Seychelles' EEZ	Catches made in other EEZs & on the High Seas	Total Western Indian Ocean catches
Others	12.6	0.3	12.9
Others catch	<u>129.1</u>	<u>1.4</u>	<u>130.5</u>
Total catch	<u>1,864.4</u>	<u>287.6</u>	<u>2,152.0</u>

In addition to the above shown disaggregation according to flag States (i.e. Seychelles, Taiwan (POC), Others⁶⁰) and geographical areas (Seychelles EEZ, Western Indian Ocean (inclusive of Seychelles)), the published retained catch data is further [disaggregated](#) by a number of attributes, fulfilling the requirements of the FiTI Standard:

- by month,
- by target species or species groups (i.e. Yellowfin, Bigeye, Swordfish, Marlin, Sharks, others),
- by the agreement under which the access regime is defined.

➡ **Landings and transshipments in Seychelles' ports:** Data on landings and transshipments in national ports from large-scale fisheries for 2019 was available online, published in the Fisheries Statistical Report (2019).

- **Purse seine fishery:** Total landing and transshipment in Port Victoria by purse seine vessels licenced to fish in Seychelles' waters for 2019 is summarised below (in Mt), disaggregated by Flag State.

Flag State	Landings	Transshipments	Total
Seychelles	18,044	86,524	104,568
Spain	10,195	155,978	166,173
France	13,285	57,260	70,545
Others (Italy, Mauritius, Korea)	5,746	40,675	46,421
Total	<u>47,270</u>	<u>340,437</u>	<u>387,707</u>

However, the published landing data cannot be not considered fully in accordance with the FiTI Standard, as the data was not disaggregated in a manner that allowed 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

⁶⁰ For 2019, 'Others' includes catches from five Chinese vessels.

locations are stored in the same wells and can therefore not be physically separated.

Despite the fact of such practical challenges for data disaggregation, it is notable that the data set is further [disaggregated](#) by several other attributes, including:

- by month,
 - Flag State (data is provided separately for the three main flag States (i.e. Seychelles, France and Spain), and grouped for the other three countries with smaller numbers of vessels (i.e. Italy, Mauritius, Korea),
 - fish species (i.e. Yellowfin, Skipjack, Bigeye, Albacore, Mix species),
 - fish size categories (< 10kg and > 10kg for Yellowfin and Bigeye; < 1.8kg, 1.8 – 3.4 kg, > 3.4kg for Skipjack),
 - whether the landing is to reefer vessels, IOT or reefer containers,
 - the agreement under which the access regime is defined (national, European Union, Others), and discards).
- **Industrial longline fishery:** Data on landings and transshipments made in Seychelles' ports for 2019 have not been published at all, due to technical software issues.

However, landing and transshipment data of all industrial longliners licenced to fish in Seychelles' waters in all ports or location where landing and transshipment occurs is recorded in vessels logbooks and captured in electronic format by the SFA.

The issue of vessels not returning their logbooks impacts also the credibility of the compiled volume of catches transshipped or landed.

- ➡ **Landings and transshipments in foreign ports:** Data on landings and transshipments in foreign ports from the large-scale fisheries for 2019 is available online, published in the Fisheries Statistical Report (2019).

Similar to landings and transshipments in national ports, this data for foreign ports cannot be disaggregated in a manner that allows catches made in Seychelles' waters to be separated from those made in other national jurisdictions or on the High Seas.

- **Purse seine fishery:** Published 2019 data indicates that a total of 19,104 Mt of fish caught by purse seiners licenced to fish in Seychelles' waters were landed or transshipped in foreign ports in 2019. This equates to 5% of the catch that is made by purse seine vessels licenced to fish in Seychelles' waters.

Only two foreign ports – Diego Suarez (Madagascar) and Port Louis (Mauritius) – were used in 2019 for landings and transshipments. In addition to the port, the data set is further [disaggregated](#) by several other attributes, including:

- by month, quarter, semester,
- by fish species (i.e. Yellowfin, Skipjack, Bigeye, Albacore, Mix species), and
- by discards.

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

- **Industrial longline fishery:** Such data has not been published by Seychelles' authorities, despite the fact that the majority of data is being collated by the SFA.

- ➔ **Discards:** Data on fish discards has been published in the Fisheries Statistical Report (2019). However, this relates *only to information from the purse seine fishery; no information from the industrial longline fishery has been published.*

- **Purse seine fishery:** Published data on discards shows that in 2019, a total of 272 Mt of discards were unloaded in Port Victoria, whereas no discards were unloaded in foreign ports.

In addition to port information, this data set is further [disaggregated](#) by month, quarter, semester and year, but not by species or species groups (as required by the FiTI Standard).

No work has been undertaken by Seychellois authorities to verify the accuracy of discard information. However, the SFA seeks to address this matter. In 2019, it piloted an Electronic Monitoring project on industrial longliners to address the lack of observations at sea for this component of Seychelles' fishery. Three vessels were equipped with sensors and cameras to record setting and hauling activities, estimate the size and species composition of the catch retained and discarded and monitored transshipments at sea. [The analysis from the on-board observations has not been published yet.](#)

There is currently no official published information on how discard data is collected by Seychellois authorities. As part of this FiTI Report, the following information is given:

- For the *purse seine fishery*, it is the vessel agent that reports the discards during landing and transshipment via the landing forms. Information on discards at sea is recorded in logbooks, which are submitted directly to the SFA by vessel operators.
- For the *industrial longline fishery*, discards are solely reported in logbooks.

Finally, non-fish species discards are recorded by both the purse seine and industrial longline fishery and reported to the IOTC through the annual national reports to the Commission's scientific committee.

For sharks, marine turtles, sea birds, and marine mammals, reports also include information on whether the animal is discarded alive or dead. The IOTC publishes these national reports on their website, but so far these reports have not been published by Seychelles (or referenced on an official government website).

➔ **Fishing effort:** Data on fishing effort of Seychelles-flagged and foreign-flagged large-scale vessels for 2019 was published online, through the Fisheries Statistical Report (2019). *However, this data is incomplete* for the following reasons:


- Data is only available for Semester 1 (January – June 2019) for Seychelles-flagged and Taiwan (POC)-flagged vessels;
- Data is only available for Quarter 1 for vessels of other flags operating in the industrial longline fishery.

Furthermore, as already stated above, the published Semester 1 effort data is based on 91% of logbook return for Seychelles-flagged vessels, and 81% for other fleets.

For both, the purse seine and industrial longline fishery, the SFA collects and archives data on fishing effort by individual vessel. However, such data has never been published by the authorities.

- **Purse seine fishery:** Fishing effort data is published as *days fished*. Published data for 2019 indicates that the purse seine vessels licenced to fish in Seychelles' waters spent a total of 10,0116 days fishing in the Western Indian Ocean, of which 2,577 days were spent fishing within Seychelles' EEZ.

The following table summarises fishing effort of purse seiners licenced to fish in Seychelles' waters for the year 2019, disaggregated by flag State and geographical areas where fishing took place.

	Fishing effort (days fished) in...		
	... Seychelles' EEZ	... other EEZs & the High Seas (<i>calculated</i>)	... the Western Indian Ocean region
 Seychelles	634	2,288	2,922
Spain	738	2,958	3,696
France	743	1,345	2,088
Others	462	948	1,410
Total	2,577	7,539	10,116

In addition to a [disaggregation](#) according to flag State (Seychelles, France, Spain, others⁶¹) and geographical areas⁶², the fishing effort can also be disaggregated by other attributes, including:

- by month, quarter, semester, year,
 - by the agreement under which the access regime is defined (European Community, others).
- **Industrial longline fishery:** Fishing effort data is published as the number of *hooks set*. Published data indicates that the industrial longline vessels licenced to fish in Seychelles' waters deployed over 21 million hooks in the Western Indian Ocean during the first semester of 2019, of which over 6 million were within Seychelles' EEZ.

The following table summarises fishing effort of industrial longline vessels licenced to fish in Seychelles' waters for Semester 1 of 2019, disaggregated by flag State and geographical areas where fishing took place.⁶³

	Fishing effort (hooks set) in ...		
	... Seychelles' EEZ	... other EEZ & on the High Seas (<i>calculated</i>)	... the Western Indian Ocean region
Seychelles	1,613,257	14,925,669	16,538,926
Taiwan (POC)	4,138,219	610,524	4,748,743
Others	399,000	3,000	402,000
Total	6,150,476	15,539,193	21,689,669

In addition to a [disaggregation](#) according to flag State (Seychelles, Taiwan (POC) and Others) and geographical areas, the fishing effort can also be broken down by other attributes, including:

- by month, quarter, semester, year, and
- the agreement under which the access regime is defined (National, TTA, TFI).

⁶¹ As three other countries (Korea, Mauritius, and Italy) have a total of five purse seiners among them, their effort data is combined and published as 'Others'.

⁶² Data on fishing efforts in other EEZs and on the High Seas is only published for Seychelles-flagged purse seine vessels. However, for other flag States their fishing effort in other EEZs can be calculated by subtracting effort exerted in Seychelles' EEZ from those exerted in the Western Indian Ocean region.

⁶³ Published industrial longline vessels effort data is available for Semester 1 for Seychelles- and Taiwan (POC)-flagged vessels, but only for Quarter 1 for other-flagged vessels.

➔ Evaluation or audits of the economic, social and food security contribution of the large-scale fishing sector:

Evaluations of the *economic contribution* of the large-scale fishing sector have been undertaken for 2019. However, the published information was not disaggregated from those of the small-scale fishing sector.

Data on the *Gross Domestic Product (GDP)* contribution of the fisheries sector up to 2019 was accessible and has been published by the government of Seychelles through the Annual National Accounts Statistics, a work product of the National Bureau of Statistics (NBS). Certain economic indicators are also published in the CBS's Annual Report for 2019. However, areas with discrepancies have been noted between the NBS and CBS reports.

Based on the official published government information, the GDP contribution of the fisheries sector in Seychelles is surprisingly low. In 2019, GDP contribution of the fisheries sector accounted for only 0.9% of total GDP at market prices. One explanation for this is that the production of canned tuna is not considered when calculating fisheries' contribution to the GDP.

Economically, the fisheries sector was responsible for a total domestic production of 58,257 Mt and total export value of SCR 3,576,876 million. No information on the total expenditure from the industrial tuna fishery for the year 2019 is published, but in 2018 it amounted to SCR 2.188 billion. Such economic data, along with other more detailed fisheries economics, are typically included in the Annual Report of the SFA, which is yet to be published for the year 2019.

The *social contribution* of the large-scale fishing sector has received less attention than its economic contribution. The sector's social contribution is mostly through employment. There is no dedicated information for fisheries, as official employment statistics grouped data for agriculture, forestry and fisheries together. Employment in these sectors have been published for 2019 as part of the 'Formal employment and earnings 2019 Q4 Statistical Bulletin'. The average employment in this category is 621, with an average salary of SCR 10,468. However, these statistics do not consider employment in fishing-related industries and services, such as the tuna cannery, quality control companies, or government staff employed at SFA and MFBE.

An employment study undertaken by the Department of the Blue Economy in 2018 estimated that

- industrial tuna fishing and related activities employ about 6,900 people, of which 72% are males and 28% females,
- thereof, 1,590 employees were employed in the harvest sector (fishing), accounting for 23% of the total number of people employed in the industrial tuna fishery. Most of these employees are expatriates.

The Indian Ocean Tuna (IOT) canning factory remains by far the largest employer in the sector with 2,143 workers (23% Seychellois and 77% expatriates). The cannery is the largest female employer with 1,420 women (21% Seychellois and 79% expatriates).

Stevedoring services are the largest Seychellois male employer with approximately 1,000 workers (95% Seychellois and 5% expatriates).

An employment study funded by the SWIOFish3 project and implemented by the Marine Resource Assessment Group (MRAG) is currently under way to assess the employment and capacity needs for Seychelles' fisheries sector. It is expected that the conclusion of this study (expected for mid-2021) will provide a better overview of employment in the different sub-sectors of the fisheries sector, including a gender breakdown.

There are no official publications by Seychelles' government on the *food & nutrition security contribution* of the large-scale fishing sector. However, the National Food and Nutrition Security Policy (2013) does recognise the strong link between fisheries and food security in Seychelles as well as the need for fisheries to be managed sustainably so that it can continue to play its important role in food security.

Recommendations

We, the National MSG, make the following recommendations to improve transparency regarding catches made by large-scale fisheries:

ID	Recommendation	Suggested priority	Suggested date for completion
2019-5_4	<i>SFA should publish all missing information for catches, landings, transshipments from the industrial longliner fishery for 2019.</i>	High	September 2021
2019-5_5	<i>SFA should set up an online database containing annual retained catches and transshipments and landings at local and foreign ports, disaggregated by flag state, species or species groups, gear type and catch location (national waters, third country waters, High Seas) in order for interested stakeholders to obtain detailed information on catch data.</i>	Low	December 2022
2019-5_6	<i>SFA should publish data on discards from the industrial longline fishery disaggregated as per the FITI requirements, and from the purse seiner fisheries by port of unloading, and by species or species groups.</i> <i>Furthermore, a note should be added in the introduction of the Fisheries Statistical Reports</i>	High	September 2021

	<i>to provide information on how discard data is collected by the authorities.</i>		
<i>2019-5_7</i>	<i>MFBE should publish annual summaries of the socio-economic contribution of the large-scale fishing sector.</i>	<i>High</i>	<i>December 2022</i>
<i>2019-5_8</i>	<i>MFBE should publish on its website national evaluations or audits of the economic, social and food security contributions of the large-scale fishing sector, once available (e.g. the upcoming study on employment in fisheries)</i>	<i>High</i>	<i>December 2021</i>

2.6 Small-Scale Fisheries

Transparency requirements	Availability	Accessibility	Completeness
Seychelles must publish the following information on its small-scale fisheries sector (as set out in the national legislation):			
i. Total number of small-scale fishing vessels, disaggregated according to categories of fishing or gear types.	Yes	Yes	No
ii. Total number of fishing licences issued to small-scale fishing vessels, disaggregated according to categories of fishing authorisations.	Yes	No	No
iii. Total number 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.	Yes	No	No
iv. Total payments made from small-scale fisheries relating to fishing authorisations, catches and landings, disaggregated according to categories of fishing authorisations or gear types, indicating the recipient of these payments.	Yes	No	No
v. Quantity of catches, disaggregated according to species, categories of fishing authorisations and gear types.	Yes	Yes	No
vi. Total volumes of discards, disaggregated according to species, categories of fishing authorisations and gear types.	No		
Seychelles must publish the most recent studies and reports on quantities and species of fish discarded by the small-scale fisheries sector, if available.	No		
Seychelles must publish evaluations or audits of the economic, social and food security contribution of the small-scale fisheries sector, if available.	No		

The small-scale sector in Seychelles includes the following two distinct fisheries (sub-sectors):⁶⁴

The *artisanal fishery* comprises all domestic fisheries, including boats ranging in length from 4 to 15 m. The main gears used by the artisanal fishing fleet include hook and line, drop-lines, traps and nets that are used to catch a diverse array of demersal and pelagic fish species.


⁶⁴ The artisanal and semi-industrial sub-sectors use a number of different boat types of different characteristics and requirements, as outlined in the Fisheries Comprehensive Plan (2019).

The *semi-industrial longline fishery* comprises medium-size vessels ranging from 14 to 23 metres in length. Their main target species are broadbill swordfish, big eye and yellowfin tuna, with marlin and sharks as the primary bycatch.

➔ **Small-scale fishing vessels:** This information is published online in the Fisheries Statistical Report 2019, including the total number of active vessels (i.e. 503), as well as a breakdown according to

- sub-sector (i.e. 469 vessels in the artisanal fishery, 34 vessels in the semi-industrial fishery), and
- by vessel type (as shown in the table below).⁶⁵

A breakdown according to gear types is not provided, as many boats in the small-scale fisheries are multi-gearred.

	No. of vessels	Information available online?	Information seen as complete?
Outboard	335	Yes	No
Whaler	71	Yes	No
Schooner	49	Yes	No
Semi-industrial longliner (pelagic longline fishing)	34	Yes	Yes
Others ⁶⁶	9	Yes	No
Semi-industrial longliner (artisanal fishing) ⁶⁷	4	Yes	No
Pirogue	1	Yes	No
Inboard	0	N/A	N/A
<i>Fisher on foot</i>	0	Yes	No
Total	<u>503</u>	<u>Yes</u>	<u>No</u>

However, the published information *cannot be seen as complete*, due to two major gaps:

- The published list does not include the 25 vessels that were operating in the sea cucumber fishery. Furthermore, it is possible that vessels participating in the lobster fishery are also not included here.

⁶⁵ These classifications of small-scale fishing vessels are not addressed in the current fisheries legislation. The Fisheries Comprehensive Plan has proposed the implementation of a new five class vessel classification system, based on the specification of vessels along with permissible activities that each class of vessel can engage in, subject to having the required licences.

⁶⁶ Include other vessels like seadog, etc.


⁶⁷ Industrial longliner conducting artisanal fishing trips. These are longliners that are targeting demersal fish. It is not clear from the published data whether these vessels also participate in pelagic longline fishing.

- Fisher on foot are known to be operating in the fishery. However, the report lists them as nil.

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.

- **Small-scale fishing licences:** The government of Seychelles has not published any such information for 2019, apart for the restricted access lobster fishery⁶⁸ (and now also sea cucumber, as part of this FiTI Report). Legally, the Fisheries Act does not list any requirements for issued fishing licences to be published.

Information concerning the list of licenced small-scale fishing vessels, made available by the MCS Division of SFA for the compilation of this report, **does not correspond to the number of vessels in operation and indicates that either not all licences are reported in the system due to data loss, or that several small-scale commercial vessels fish without a licence.**⁶⁹ The list of small-scale fishing vessels and their licence validity for the year 2019 was published on the SFA website during the FiTI report preparation process.

	Licences issued to the small-scale fishing sector for 2019:
Artisanal	148
Sea cucumber	25
Net	13
Lobster	10
Semi-industrial	7
Total	<u>203</u>


- **Fishers engaged in the small-scale fishing sector:** Such information for 2019 is collated by SFA, but not published. 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.

Data on licenced fisher and boat owners, made accessible by SFA for the FiTI report for the year 2019 and 2020, is summarised in the table below. Information shows that there

⁶⁸ For the 2019/2020 season, the list of licences issued for the lobster fishery is published on the website of the Ministry of Fisheries and Agriculture (now called the Ministry of Fisheries and Blue Economy).


⁶⁹ The list of small-scale fishing licences issued does not correspond with the total number of vessels in operation per month. This aspect is also acknowledged in the Fisheries Comprehensive Plan: 'The data presented indicates discrepancies in the statistics of the number of fishing vessels that are licenced in this sub-sector.'

was a rush to register in 2020, possibly as a result of COVID-19 relief employment benefits that were being made available to fishers.

	2019		2020	
	Male	Female	Male	Female
 Boat owner	21	10	86	28
Boat owner fisher	85	0	288	0
Fisher	124	2	584	4
Divers	32	0	115	0
Total	262	12	1,073	32

- **Payments made from the small-scale fishing sector:** Payment information from the small-scale fisheries sector is collated by SFA, but not published for 2019. SFA informed the National MSG that a sum of SCR 543,408 was collected as payments for fishing license fees made by small-scale fisheries for the year 2019. It was not possible to verify this amount, as the list of licenced small-scale vessels provided by SFA was seen as incomplete.

- **Catches by the small-scale fishing sector:** Such information is published in the Fisheries Statistical Report 2019. Similar to the number of vessels, this information *cannot be seen as fully complete*, due to identical gaps as stated above:
 - The published information does not include catches from the sea cucumber and lobster fisheries.

Catches	Quantity (Mt)
 Artisanal fishing	4,548.9
Carangues	1,172.7
Bourgeois	546.8
Job	541.4
Maquereau Doux	427.7
Cordonier	307.6
Capitaine	265.1
Other Trap Fish	242.0
Red Snapper	180.6

Becune	172.9
Other Vielle	153.5
Bonite	115.3
Maconde	113.9
Other Pelagics	92.3
Other Maquereau	63.7
Crab	53.9
Others	33.6
Octopus	33.0
Sharks & Rays	32.9
Semi-industrial fishing	<u>2,009</u>
Yellowfin	1,507
Swordfish	313
Bigeye	119
Marlin	55
Sailfish	13
Others	2
Sharks	0

For the demersal fishery, the catch data is disaggregated by boat and gear types and by species groups, but not by individual species.

- ➔ **Discards by the small-scale fishing sector:** The government of Seychelles does not collect any statistics or publish studies on the species and volumes of fish discarded by small-scale fisheries. The volume of discards in these fisheries is typically seen as very small. The vast majority of fish caught in the small-scale fisheries are sold for human consumption. Fish not used for human consumption are usually used as bait or as food for domestic animals.⁷⁰

⁷⁰ The only group of species that is not kept at all and is discarded right away are the pufferfish (*Tetraodontidae*), due to their toxicity.

- ➔ **Economic, social and food security contribution:** No such evaluation or audit has been conducted by Seychelles' authorities. The only known study on the food security contributions of the small-scale fisheries sector is a market and gap analysis study, which looked at the demand and supply situation of the agricultural and fisheries sector in Seychelles. The study was commissioned in 2014 by the Competitive Local Innovative Small Scale Agriculture Model (CLISSA) project of the then-Ministry of Fisheries and Agriculture. [This study has not been published.](#)

Recommendations

We, the National MSG, make the following recommendations to improve transparency regarding Seychelles' small-scale fisheries sector:

ID	Recommendation	Suggested priority	Suggested date for completion
2019-6_1	<p><i>In addition to the information already provided, as outlined above, MFBE or SFA should publish the:</i></p> <ul style="list-style-type: none"> ➔ <i>total number of small-scale fisheries licences, and</i> ➔ <i>the total numbers of fishers engaged in the fishing sector, including gender information and whether fishers are engaged in full-time work, seasonal or part time fishing, occasional fishing or recreational fishing.</i> 	High	September 2021
2019-6_2	<i>MFBE should publish annual summaries of the socio-economic contribution of the small-scale fishing sector.</i>	High	December 2022

2.7 Post-Harvest Sector and Fish Trade

Transparency requirements	Availability	Accessibility	Completeness
Seychelles must publish information on the post-harvest sector and fish trade:			
i. Total quantity of fish and fish products produced, disaggregated by species and fish products.	Yes	No	Partially
ii. The total quantity of imports of fish and fish products, disaggregated by species and fish products, indicating the country of their origin.	Yes	Yes	No
iii. The total quantities of exports of fish and fish products, disaggregated by species and fish products, indicating the country of their destination.	Yes	Yes	Partially
iv. The total number of people employed in commercial fisheries sectors, including the number of men and women working in specific sub-sectors.	Unknown		
v. The total number of people employed in informal fisheries sectors, including the number of men and women working in specific sub-sectors.	N/A		
Seychelles must publish reports or studies on wages in the post-harvest sector, if available.	No		

- **Quantity of fish and fish products produced:** The total quantity of fish and fish products produced for the year 2019 has not been published to date.⁷¹ This is due to the fact that the SFA Annual Report 2019, in which such data is usually published, is yet to be released. It is further noted that such information is not disaggregated by individual species as multiple species can be used to make the same product.
- **Imports of fish and fish products:** The total amount of imports of fish and fish products for 2019 is published as part of the Merchandise Trade 2019 Q4 Statistical Bulletin of the NBS.⁷² This information refers only to the total monetary value of imports, using the Harmonized System Codes, but not the weight, species and country of origin of the imported fish and fish product. However, this information is documented by the NBS, and passed on to SFA, which publishes this information in its annual report. As stated already, the publication of this report is delayed. The import value for 2019 was SCR 1,565,720,000. No information on the total imported weight is available for 2019. The

⁷¹ Despite the fact that the majority of Seychelles' fish and fish products are exported, and such information is published in the Merchandise Trade Statistical Bulletin, the total quantity of fish and fish products cannot be estimated based on this information, as it would not account for locally consumed fish products and non-edible products, like pearls.

⁷² <https://www.nbs.gov.sc/downloads/merchandise-trade-2019-q4/download>

latest available information is from 2016: 76,441 Mt (of which 76,185 Mt were frozen fish (tuna) for the canning factory).

- **Exports of fish and fish products:** The total quantity of exports of fish and fish products for 2019 is also published as part of the Merchandise Trade 2019 Q4 Statistical Bulletin of the NBS. Published export data is disaggregated according to the Harmonized System Codes and falls into five categories, as shown below.⁷³ The published export data by the NBS is not disaggregated by species level.⁷⁴

<u>Fish products exported</u>	<u>Export country</u>	<u>Export value (SCR '000)</u>
Fresh and frozen fish	Sri Lanka	27,566
	Spain	20,761
	USA	17,714
	UK	11,944
	Reunion	7,298
	France	2,906
	Others	135,818
	Sub-total	224,007
Canned tuna	France	1,307,117
	UK	1,034,201
	Italy	475,773
	Germany	107,175
	Others	173,273
	Sub-total	3,097,539
Fish oil and fats	Australia	61,807
	Iceland	12,131
	Others	3,235
	Sub-total	77,173
Fish meal	Australia	32,103
	Japan	13,461
	Sri Lanka	5,563
	Others	63,799

⁷³ Data on the *total quantity of exports* is available as an annual sum for the five categories. The *total monetary value of export (in SCR)* is provided as an annual sum, as well as per quarter. The *monetary value of exports broken down for some of the most important export destination countries* is also published (see below).

⁷⁴ The National MSG assumes 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, as part of this first FiTI Report, no such information was reconciled.

<u>Fish products exported</u>	<u>Export country</u>	<u>Export value (SCR '000)</u>
	Sub-total	114,926
Sea cucumber	Hong Kong	63,231
	Sub-total	63,231
Grand total		3,576,876

- **Employment in commercial fisheries sector:** No accurate estimate of the number of people employed in Seychelles' commercial fisheries sectors, including the number of men and women working in specific sub-sectors, was published for the year 2019. The National MSG was unable to determine whether such a total number is available in the government's systems at all.
- **Employment in informal fisheries sectors:** In the opinion of the MSG, Seychelles does not have a substantial informal fisheries sector. Hence, no such information is collated by the government.
- **Wages in the post-harvest sector:** Information on wages in the post-harvest sector is not collated and there are no reports or studies which have been published to date on this topic. The NBS publishes total wages in the fisheries, agriculture and forestry sector combined, but it is not clear which components of the fisheries sector this involves. Also, the annual average employment (621 people) in the sector for 2019 appears to be underestimated.

Recommendations

We, the National MSG, make the following recommendations to improve transparency regarding Seychelles' post-harvest sector and fish trade:

ID	Recommendation	Suggested priority	Suggested date for completion
2019-7_1	<p><i>Given the paramount importance of fish trade for Seychelles, MFBE or SFA needs to ensure that annual information on the quantity of fish and fish products produced, as well as information on imports and exports, are published online in a timely manner.</i></p> <p><i>Such information should be disaggregated by species, as well as the country of destination/origin.</i></p>	Medium	December 2022

2019-7_2	<i>MFBE or SFA should publish annual employment information regarding Seychelles' commercial fisheries sector, disaggregated by gender and sub-sectors (e.g. industrial and artisanal fishing).</i>	<i>Medium</i>	<i>December 2023</i>
2019-7_3	<i>MFBE should clearly state whether an informal fisheries sector exists in Seychelles.</i>	<i>Medium</i>	<i>December 2021</i>

2.8 Fisheries Law Enforcement

Transparency requirements	Availability	Accessibility	Completeness
Seychelles must publish the following information relating to fisheries law enforcement:			
i. The national activities and strategies used for ensuring compliance of fishing vessels and the post-harvest sector with national legislation.	Partly	No	No
ii. The financial and human resources deployed by the government to ensure compliance with national legislation.	Yes	No	Unknown
iii. The total numbers of inspections of fishing vessels at sea and in ports.	Yes	No	No
Seychelles must publish an up-to-date record of convictions for major offences in the fisheries sector (of the last five years), indicating the name of the company or vessel owner, the nature of the offence and the penalty imposed.	Yes	No	No

- **Activities and strategies for ensuring compliance:** For 2019, no comprehensive report on national activities and strategies used for ensuring compliance of fishing vessels and post-harvest sector exists, despite the fact that in recent years there has been an apparent increase of illegal fishing activities in Seychelles' waters.

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.

However, a number of compliance and policy instruments exist, which provide strategic directions on fisheries compliance, including:

- The *National Plan of Action (NPOA) for Illegal, unreported and unregulated (IUU) fishing (2007)*⁷⁵ → this report is not published yet;
- The *Seychelles National Plan of Action for Sharks (2016 – 2020)* → published now on the SFA website as part of this FiTI reporting process;
- The *Fisheries Comprehensive Plan (2019)* → published already prior to this FiTI report on the MFBE's and the SFA's websites;
- The *Fisheries Policy and Strategic Plan (2019)* → published already prior to this FiTI report on the MFBE's and the SFA's websites;

⁷⁵ This plan was never finalised and is currently being updated by SFA before approval and publication.

- The *MCS Plan for the Mahé Plateau Demersal Fishery Management Plan (2020)* → published now on the SFA website as part of this FiTI reporting process.

There are no policies or strategies yet for monitoring the post-harvest sector, apart for the lobster fishery.

Furthermore, there is work underway by the Trade Division in the Ministry of Finance, Trade Investment and Economic Planning on how to improve catch certification before export.

- ➔ **Financial and human resources deployed to ensure compliance:** The National MSG found that the information on financial and human resources deployed by the government to ensure compliance with national legislation was not available for the year 2019.

Information provided by SFA shows that the MCS Division had a total budget of SCR 9,563,817⁷⁶ for that year. However, no report is available which collates 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). It was decided that compiling such information goes beyond the scope of this first FiTI Report (see recommendations).

- ➔ **Inspections at sea and in ports:** Inspections data has not yet been published for 2019. This information is typically compiled quarterly by SFA and annual totals are published as part of the SFA Annual Report. However, this report for 2019 has not been published yet.

- ➔ **Record of convictions and major offences⁷⁷:** A record of conviction of major offences in the fishing sector for 2019 is collated by SFA, but not published online. The list of convictions, along with the name of the company or vessel owner, the nature of the offence and the penalties imposed, is maintained by the MCS Division of SFA. Access was given to this record during this FiTI reporting process. However, this record provides only information related to IUU fishing, but not other committed offences (e.g. fishing without a licence).⁷⁸

The list of the *7 foreign vessels apprehended for illegal fishing* in Seychelles' waters is provided in Annex C.⁷⁹

⁷⁶ This included a salary budget of SCR 4,257,263.39 and an operational budget of Euro 337,365 converted using average mid-rate for 2019 from Central Bank of Seychelles archived data.

⁷⁷ As offences were only scarcely published by SFA, the National MSG did not define the term 'major offenses' for this FiTI reporting process.

⁷⁸ Information from prior 2014 show that information on a much more diverse range of offense was collected then.

⁷⁹ Kindly note that the number of vessels apprehended for IUU fishing has increased over the years: 2012 – 1 vessel; 2013 – none; 2014 – 2 vessels; 2015 – 3 vessels; 2016 – none; 2017 – 2 vessels, 2018 – 3 vessels.

Recommendations

We, the National MSG, make the following recommendations to improve transparency regarding law enforcement in Seychelles' fisheries sector:

ID	Recommendation	Suggested priority	Suggested date for completion
2019-8_1	<i>SFA should provide regular information on national strategies and activities applied to ensure compliance of fishing vessels and the post-harvest sector to MFBE, which will have the responsibility for publishing such information.</i>	<i>Medium</i>	<i>December 2022</i>
2019-8_2	<i>SFA should prepare and make available to MFBE the financial and human resources deployed by the government to ensure compliance with national and international legislation in the fisheries sector (at least on an annual basis). MFBE will be responsible for publishing such information.</i>	<i>Medium</i>	<i>December 2023</i>
2019-8_3	<i>SFA should publish offences in the fisheries sector in a timely manner. This should include the name of the company or vessel owner, the nature of the offence and the penalty imposed.</i>	<i>Medium</i>	<i>December 2022</i>

2.9 Labour Standards

Transparency requirements	Availability	Accessibility	Completeness
Seychelles 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.	No		
Seychelles must publish the following information relating to the enforcement of labour standards:			
i. The public authorities responsible for monitoring and enforcing laws on labour standards.	Yes	Yes	Yes
ii. 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.	Partly	Partly	Unknown
iii. 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.	Yes	Yes	Yes
iv. The total number of offences committed by employers in the fisheries sector that have been resolved by the authorities.	Yes	No	Unknown

- **Summary description of national laws on labour standards:** A summary description of national laws on labour standards applicable for national and foreign workers employed in the fishing sector at sea or for those in the post-harvest fisheries sector does not exist. The National MSG determined that it is beyond the scope of this first FiTI Report to provide such a summary and instead included this in its recommendations (see below).
- **Enforcement of labour standards:** 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 MESA⁸⁰, but not yet on the website of MFBE or SFA.

⁸⁰ <http://www.employment.gov.sc/labour-relation-division>

- **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:** The Fisheries Comprehensive Plan addresses adherence to labour standards only onboard Seychelles-flagged industrial fishing vessels⁸¹, but not in the artisanal and semi-industrial longline fisheries. The Plan also acknowledges operational challenges by stating that *'The Seychelles-flagged longline fishing vessels employ crew of different nationalities coming from different parts of the world, such as Philippines, Indonesia, China etc. As these vessels do not frequent Port Victoria, the respective authorities are unable to ensure that the working conditions of the crew on board these vessels or their contract of employment are in order.'*

Furthermore, under policy 7 of the Seychelles Fisheries Policy and Strategy, which addresses *Employment, training, resourcing and human resource development*, a statement regarding labour issues is given⁸².

The National MSG was unable to determine whether government agencies (e.g. MESA) provide information on the financial and human resources deployed to enforce the laws on labour standards in the fisheries sector.

- **Mandate to receive labour complaints:** Complaints related to workers' grievances are usually channelled through the Labour Relation Division of the MESA. No explicit reference is made to receive labour-related complaints from workers in the fishing and post-harvest sector.

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

- **Number of offences committed by employers in the fisheries sector that have been resolved by the authorities:** No such information is published, neither by MESA, MFBE or SFA. The MESA reports that since 2016, there have been 21 complaints of unpaid salaries in the fisheries sector, out of which one was settled by mediation, 19 were withdrawn (18 of which followed informal negotiations) and one of which was mediated unsuccessfully and has reached the Employment Tribunal. However, no information for the calendar year 2019 is published.

⁸¹ The Fisheries Comprehensive Plan states: *'As part of its flag State responsibility, employment and labour conditions on board Seychelles industrial fishing vessels must meet the minimum international recognised standards. The respective government agencies - SFA, SMSA and the Department of Employment - will collaborate to subject Seychelles-flagged fishing vessels to comply with these standards, and also to the basic wage conditions either provided by Seychelles legislation or minimum standard set by the International Labour Organisation (ILO), whichever is highest and under no circumstance be below ILO standard.'* The Plan also identifies the ratification of the ILO work in fishing convention no.188 (adopted in 2007) as a follow-up action.

⁸² Statement on labour issues from the Seychelles' Fisheries Sector Policy and Strategy: *'The Government will promote and implement good practices relating to labour (i.e. ILO Work in Fishing Convention and Work in Fishing Recommendation, 2007 (No. 199)) and working conditions on vessels registered and flying the Seychelles flag, on the entire Seychelles fleet, including industrial longliners in particular.'*

Recommendations

We, the National MSG, make the following recommendations to improve transparency regarding labour standards in Seychelles' fisheries sector:

ID	Recommendation	Suggested priority	Suggested date for completion
2019-9_1	<i>MFBE should publish online an official 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 in Seychelles.</i>	<i>High</i>	<i>December 2021</i>
2019-9_2	<i>SFA should obtain and publish information from the MESA on offences committed by employers in the fisheries sector, as well as mitigating actions taken.</i>	<i>High</i>	<i>December 2021</i>

2.10 Fisheries Subsidies

Transparency requirements	Availability	Accessibility	Completeness
Seychelles must publish information on:			
Type of government financial transfers or subsidies to the fisheries sector	Yes	No	Unknown
Value of government financial transfers or subsidies to the fisheries sector	Unknown	No	Unknown
Recipients of government financial transfers or subsidies to the fisheries sector	Yes	No	Unknown
Average annual value of any fuel subsidies per unit of fuel in nominal and percentage terms.	Unknown	No	Unknown

As a general remark, the National MSG determined that there is very little (if any) information provided by the government of Seychelles regarding fisheries subsidies. A comprehensive report on the value of government subsidies and financial transfers made to Seychelles' entire fisheries sector was neither existent for 2019, nor any previous years.

This is in particular noteworthy as subsidies have become one of the *most controversial subjects in debates on fisheries reforms*. Perhaps more than any other single factor, subsidies are seen as the source of a range of problems, such as overfishing, illegal fishing and unfair benefit-sharing. In Seychelles, policy 4 of the Seychelles Fisheries Policy and Strategy is focused on *Building efficiency in the industry*, listing a number of strategies aimed at addressing overcapacity and subsidy dependency in the small-scale fisheries sector.

This lack of information also challenges national legal obligations. For example, the Access to Information Act legally mandates government organisations to publish detailed information on the design and execution of any subsidy programmes implemented with public funds, including the amounts allocated and expended, the criteria for accessing the subsidy, and the beneficiaries through the articles of section 5(1)(f) and 5(1)(h): *'Every public body shall publish in such manner as may be prescribed the following Information produced by or in relation to that body within 30 days of the information being generated or received by that body [i.e.]*

(f) detailed information on the design and execution of any subsidy programmes implemented with public funds, including the amounts allocated and expended, the criteria for accessing the subsidy, and the beneficiaries;

(h) reports containing the results of surveys, studies or tests, including scientific or technical reports and environmental impact assessment reports, prepared by the public body.'

Both MFBE and SFA have published the names of their respective Information Officers in the Official Gazette, whose duties include (amongst others) that such information related to fisheries is published.

This lack of information *triggers uncertainty* about what constitutes a financial transfer or subsidy to the fisheries sector. No definition or explanation is published on the websites of MFBE or SFA. The parameters for defining what is and is not a subsidy is not just a technical matter: it determines what government information is subject to disclosure.⁸³

- ➔ **Subsidies given to large-scale fisheries in Seychelles:** No information of government financial transfers or subsidies provided to large-scale fisheries is published and *the National MSG was unable to determine whether such subsidies are given at all and under what conditions.*
- ➔ **Subsidies given to small-scale fisheries in Seychelles:** There is also no information on subsidies to small-scale fisheries published online by the government. However, as part of this FiTI Report, the National MSG was able to compile the following summary, based on a report commissioned by SFA in 2017⁸⁴:
 - *Reduced licence fee:* Artisanal (and semi-industrial) boat owners benefit from subsidised licence fees from SFA, as outlined in chapter 2.2. For example, the generic annual licence fee is currently SCR 500, which does not reflect the resource value as well as the management costs associated with the fishery.
 - *Business tax exemption:* Fishers are not necessitated to pay business tax and boat owners and processors are only liable to pay a 15% flat rate on income above SCR 240,000 per year.
 - *Income tax concession:* A flat income tax of SCR 100 per month per fisher is payable for fishers employed by a boat owner.
 - *VAT concession:* Exemption of Value Added Taxes (VAT) is given for imported goods, such as baits, safety equipments and capital equipments (i.e. any equipment used solely in the production or processing of commercial fishing activities with a value of more than SCR 1,000). This includes construction materials, boat building materials, refrigeration trucks and forklifts.
 - *Fuel subsidy:* Artisanal fishery can claim refunds at the concessionary rate of SCR 8.00 per litre from SFA for purchasing fuel at private fuel stations. Semi-industrial fishers can directly purchase fuel at the reduced price, after deduction of the concession, at SFA's fuel station at Victoria or the Providence artisanal fishing port.
 - *Duty concession on commercial motor vehicle:* Operators in the fisheries sector pay 50% of applicable Customs duty on the importation of commercial motor vehicles.

⁸³ The definition of the World Trade Organisation (WTO), which is the only legally binding definition relevant to fisheries, is regularly described as being narrower than other definitions. See WTO (2006), 'World Trade Report'.

⁸⁴ Rassool, B. (2017) 'Review of subsidies provided to the artisanal fisheries sector', 27 pp. Information from this document has been updated as part of this FiTI Report, where applicable. *This report has not been published yet by the government.*

- **Ice concession:** Boat owners are eligible to purchase sold ice at a subsidised rate of SCR 30 per 50 kg bag, compared to SCR 80 per 50 kg bag priced for the general public.⁸⁵
 - **Concessionary insurance:** SFA covers 50% of the boat owners' net premium, equating to 4% of the insured boat value.⁸⁶
 - **Accelerated depreciation:** Special rates of depreciation on capital investments, other than land and buildings are given (Year 1: 45%, Year 2: 40%, Year 3: 20%, Year 4: 15%, Year 5: 5%).
 - **Concessionary loans:** A number of concessionary loan schemes are available to the fisheries sector, e.g. from the Small Business Finance Agency, the Development Bank of Seychelles, offering preferential financing conditions to small-scale fishers.
 - **Gainful Occupation Permit (GOP):** The semi-industrial fishery, sea cucumber fishery and the mariculture sub-sector are allowed to employ non-Seychellois at a rate of 75%, 75% and 70% of their total workforce, respectively. Employment of non-Seychellois is not allowed in the artisanal fishery sector.
 - **Sickness benefit:** Fishers receive SCR 63 per day for the first 20 sick days during the year, and thereafter SCR 42 for each additional day for which a claim is lodged.
 - **Other indirect incentives:** Indirect incentives provided by government to the small-scale fisheries sector include research and infrastructural support (quays, fish markets, and gear stores). Among other onshore/quay facilities, artisanal boat owners can also avail of security services, lighting, water and access to power as well as petrol depots managed by SFA at its own cost.
- ➔ **Fuel subsidies:** Based on information obtain from SFA for this FiTI reporting process, the total value of fuel subsidies given to the artisanal and semi-industrial fishing sector in 2019 amounted to **SCR 43,304,795**. This information is not published yet on a government website.⁸⁷

The Fisheries Comprehensive Plan (2019) provides also the total value of fuel subsidies given annually between 2013 and 2018 to the artisanal and semi-industrial fishing sector. *This amounted to SCR 32,253,864 for 2018.* The Plan provides further details regarding:

⁸⁵ It is estimated that it costs SCR 1 to produce 1 kg of ice, whereas the sales price by SFA to small-scale boat owners is SCR 0.60 per kg. SFA is covering the additional costs of SCR 0.40 per kg. The Fisheries Comprehensive Plan refers to the sale of ice at a discounted rate to fishers, but does not provide any indication of the total amount of annual subsidies for ice production.

⁸⁶ An insurance scheme, the Agricultural Disaster and Fisheries Insurance Scheme (ADFIS), has been put in place through which the government covers 50% of the premium for fishing vessel insurance. The total sum insured is up to SCR 2 million per vessel. By the end of 2019, 53 vessels were insured as part of the scheme with a total premium of SCR 691,192 paid by SFA.

⁸⁷ The increase of the 2019 total value compared to the average values between 2013-2018 (+35%) was explained by SFA with the fact that in 2019, the sea cucumber fishery started to receive fuel subsidies as well.

- fuel limits for local fishing vessels according to vessel type, engine power and the type of fisheries they are involved with;
- details on the two systems in place for fuel concessions (as stated above),
- the process that needs to be followed and conditions for local fishers to be eligible for fuel concessions, and
- new measures that are to be implemented to better manage the fuel concessions and mitigate abuse.

Recommendations

We, the National MSG, make the following recommendations to improve transparency regarding fisheries subsidies given to Seychelles' fisheries sector:

ID	Recommendation	Suggested priority	Suggested date for completion
2019-10_1	<i>SFA should publish on its website the 2017 report that reviewed subsidies provided to the artisanal fisheries sector' which they had commissioned.</i>	Medium	September 2021
2019-10_2	<i>Information on the types, values and recipients of government financial transfers or subsidies to the fisheries sector in Seychelles (both large-scale and small-scale fisheries) should be published by MFBE or SFA, in particular regarding fuel subsidies, which is the main type of subsidies provided to the fisheries sector in Seychelles.</i>	High	December 2022

2.11 Official Development Assistance

Transparency requirements	Availability	Accessibility	Completeness
Seychelles must publish the following information on public sector projects:			
related to fisheries (project value, purpose, output, project evaluations)	Yes	No	Unknown
related to marine conservation (project value, purpose, output, project evaluations)	Yes	Partially	Unknown

As a general remark, the National MSG states that very little information and thus visibility is given to fisheries- and conservation-related public sector projects. There is almost no information on public sector projects being implemented on the websites of MFBE or SFA, and no references exist to websites of development partners. This results in a situation where several externally funded public sector projects related to fisheries and marine conservation, such as the World Bank's SWIOFish3 project, receive very little attention outside the core fisheries community in Seychelles.

Fisheries-related public sector projects:

Given the fact that no comprehensive list of fisheries-related projects is published online by MFBE or SFA, the National MSG compiled a list of known national (i.e. excluding regional or global projects) public sector projects for the purpose of this report. However, it is uncertain whether this covers all relevant public sector projects, funded by bilateral, multilateral and private donors.

<u>Donor</u>	<u>Project value</u>	<u>Duration</u>	<u>Purpose/Output</u>	<u>Evaluation</u>
World Bank	US\$ 5 million	September 2017 to June 2023	Third South West Indian Ocean Fisheries Governance and Shared Growth Project (SWIOFish3) <ul style="list-style-type: none"> Improve management of marine areas and fisheries in targeted zones and strengthen fisheries value chains in Seychelles 	There is no mid-term evaluation report publicly available It is unknown whether such an evaluation was conducted at all
Government of Japan through the Japan	USD 12.3 million (~1.46 billion yen)	27 months (ending April 2021)	Extension of the Providence fishing port:	There is no mid-term evaluation

<u>Donor</u>	<u>Project value</u>	<u>Duration</u>	<u>Purpose/Output</u>	<u>Evaluation</u>
International Corporation Agency (JICA) ⁸⁸			<ul style="list-style-type: none"> • Extension of the quay by an additional 220 metres from its previous 110m • Installation of new ice plants, ice storage warehouse, mooring buoys, water and power supply, landing shed, drainage, access road • Technical support for designing the facilities and supervision of construction work 	<p>report publicly available</p> <p>It is unknown whether such a project evaluation was conducted at all</p>

The National MSG would like to emphasise that financial contributions received from the *European Union* under the Sustainable Fisheries Partnership Agreement with Seychelles (refer to section 2.3) 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.

Conservation-related public sector projects:

There are several marine conservation-related projects implemented in Seychelles, but there is no comprehensive overview of them provided by the government of Seychelles. It is therefore cumbersome to understand the various projects currently being financed and implemented in Seychelles. *The National MSG determined that it goes beyond the scope of this report to compile such a comprehensive list.* Instead, several agencies that fund and/or implement conservation-related public sector projects are listed. It is uncertain whether other projects exist, what their values are, how their implementation and impact is evaluated etc.

- ➡ The website⁸⁹ of the Project Coordination Unit within the Ministry of Agriculture, Climate Change and Environment provides a comprehensive list of conservation and other environment-related projects, dating from 2007. Most of these projects have been funded by the **Global Environment Facility (GEF)** and implemented by the **United Nations Development Programme (UNDP)**. Project objectives, start and end date, funding

⁸⁸ This information was confirmed by cross-referencing information with the International Aid Transparency Initiative http://d-portal.org/ctrack.html?country_code=SC§or_group=313&year_min=2018#view=main

⁸⁹ <https://pcusey.sc/projects/>

agency, grant amount, project manager and current status are displayed. Hyperlinks for technical reports, project evaluation reports and other documents produced as part of the implementation of these projects are provided, but for a number of projects, no such documents are published online. The GEF website⁹⁰ also provides a list of all national, regional and global projects through which Seychelles has benefited. While not all the projects are marine-based, most of them have implications for the management of Seychelles' marine environment. The projects which have so far been funded by GEF amount to USD 34,950,400.

- ➔ A list of projects funded by the **World Bank** for Seychelles is also accessible online through the Bank's website⁹¹ that provides details of project titles, committed amount, approval date, status and the date that the information was last updated. Projects can be filtered according to a number of attributes, including sector, which allows for the selection of 'Fisheries' projects.
- ➔ Information regarding total ODA provided to Seychelles since 2010 can also be obtained through the website of the **Organisation for Economic Co-operation and Development (OECD)**⁹². However, data is only available for the period 2010 to 2017. Information on bilateral aid and that provided by major foundations can also be obtained online through the OECD's Development Co-operation Profiles Report⁹³, but the data is not specific to fisheries or marine conservation.

Recommendations

We, the National MSG, make the following recommendations to improve transparency regarding official development assistance for public sector projects related to fisheries and marine conservation in Seychelles:

ID	Recommendation	Suggested priority	Suggested date for completion
2019-11_1	<p><i>MFBE and the SFA should together publish an up-to-date list of fisheries-related public sector projects, funded by bilateral, multilateral and private donors.</i></p> <p><i>This list should include information on the projects' value, purpose and outputs, as well as corresponding project evaluations, if applicable.</i></p>	High	December 2021

⁹⁰ <https://www.thegef.org/country/seychelles>

⁹¹ <https://projects.worldbank.org/en/projects-operations/projects-list?searchTerm=Seychelles>

⁹² <https://stats.oecd.org/Index.aspx?QueryId=85349>

⁹³ https://www.oecd-ilibrary.org/development/development-co-operation-profiles_2dcf1367-en

2.12 Beneficial Ownership

Transparency requirements	Availability	Accessibility	Completeness
Seychelles must publish information on the country's status regarding beneficial ownership transparency:			
i. The legal basis for beneficial ownership transparency in the country.	No		
ii. The country's legal definition of beneficial ownership.	No		
iii. The availability of a public register of beneficial owners.	No		
iv. The rules and procedures for incorporating beneficial ownership in filings by companies to corporate regulators, stock exchanges or agencies regulating the access to fisheries.	Partially	Partially	No
v. The current status and discussions around beneficial ownership transparency in fisheries.	No		

As a general remark, the National MSG emphasises that, although Seychelles did not have a legal basis or definition of beneficial ownership at the end of 2019, such a legal basis was established in 2020 with the promulgation of the [Beneficial Ownership Act \(2020\)](#) and [Beneficial Ownership Regulations \(2020\)](#).⁹⁴

Section 3 of the Act defines a 'beneficial owner' as *one or more natural persons who ultimately own or control a customer or the natural person or persons on whose behalf a transaction is being conducted and includes those natural persons who exercise ultimate effective control over a legal person or a legal arrangement.*

- **Public register of beneficial owners:** Seychelles does not have a public register of beneficial owners. However, the Beneficial Ownership (BO) Act makes it a requirement for every legal person or legal arrangement to maintain an up-to-date register of beneficial owners at the principal place of business of its resident agent. Such information must be reported to the FIU, which is responsible for populating the information in a central beneficial ownership database. The administration of this database is mandated under Section 13 of the Beneficial Ownership Act, which stipulates that *the Financial Intelligence Unit shall be the nodal agency to maintain Seychelles' Beneficial Ownership database.* The FIU indicated that this database will become active (and online) by mid-2021. *While the register and the database will not be publicly available, the Beneficial Ownership Act makes provision for access to information for institutions specified under the Act (Section 13(4) and Section 14).*

⁹⁴ Furthermore, a Beneficial Ownership Guideline was jointly published in December 2020 by the Financial Intelligence Unit (FIU) and the Financial Services Authority (FSA) to provide practical guidance on the identification of beneficial owners to ensure compliance with regulatory requirements.

- **Incorporating beneficial ownership in filings by companies:** The National MSG determined that *beneficial ownership transparency in fisheries has been neglected in Seychelles*, despite international policy debates and national obligations. For example, paragraph 8(2)(r) of the Fisheries Act (2014) states clearly that *‘the record of fishing vessels shall contain the name, address and nationality of any person with beneficial ownership of the fishing vessel.’* Yet such information is rarely compiled, if at all.
- **Current status and discussions around beneficial ownership transparency in fisheries:** 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 Owner, and populate their beneficial ownership information in the central database.

MFBE has started to work on policy/implementation procedures for addressing beneficial ownership transparency in fisheries. Information obtained from MFBE suggests that an international best practice approach will be applied, where beneficial ownership information needs to be provided as part of vessel registrations or licence applications. There is no clear timeline yet on when this is expected to become a legal requirement.

The National MSG would also like to highlight that section 11 (6) of the Act makes provision for extractive companies to file the register of beneficial owners with the office of the Registrar of Companies. However, extractive companies are defined as those licenced under section 6 of the Petroleum Mining Act and, as such, do not include those operating in the fisheries sector.

Recommendations

We, the National MSG, make the following recommendations to improve transparency regarding beneficial ownership in Seychelles’ fisheries sector:

ID	Recommendation	Suggested priority	Suggested date for completion
2019-12_1	<i>MFBE should follow up with the committee working on beneficial ownership declaration in the fisheries sector and determine a policy on beneficial ownership declarations for the sector. This should be based on a participatory and transparent process, involving all interested bona fide stakeholders from government, industrial and artisanal fishing, and civil society.</i>	<i>High</i>	<i>December 2021</i>

Annex A. Statement of the Report Compiler

I was appointed on the 2nd October 2020 by the Seychelles' Department of Blue Economy to prepare Seychelles first report to the Fisheries Transparency Initiative (FiTI). Funding for this assignment came from the Third South West Indian Ocean Fisheries Governance and Shared Growth Project (SWIOFish3). This report was compiled based on the guidelines provided by two important reports published by the FiTI secretariat, namely: (i) The FiTI Standard and (ii) Guidance Note #2 Compiling FiTI Reports. I, however, found that the guidance provided in the Guidance Note #2 was not always conducive to providing the best report in terms of readability. As a result, the structure of the report was modified after the first draft to improve readability.

The assignment started with the listing of the FiTI requirements and preparation of preliminary findings for each requirement in a table format. The method used was to undertake thorough online searches for relevant information according to the FiTI requirements, then discussions were held with actors in the industry working in the specific area for which information was required. For this reason, the majority of consultations were done with senior staff of the Seychelles Fishing Authority (SFA), which is the government authority mandated for managing Seychelles' fisheries under policy guidance from the Ministry of Fisheries and the Blue Economy.

Overall, I found that government authorities were willing to provide information requested and that they often went out of their way to help the process by providing staff to compile and digitise certain information. I did find that there were still certain levels of reluctance to share information, particularly information related to foreign fishing access agreements, which I did not have the opportunity to consult, despite requests being made to the MFBE. The major challenge that I encountered in compiling this report was the fact that making information widely accessible has not been part of Seychelles' government culture. This is despite the existence of the Access to Information Act (2018), which legally requires government agencies to compile and make available for public consultation such types of information. Furthermore, the loss of fisheries catch and effort data from the SFA data servers in 2020, as a result of a ransomware attack, was responsible for major delays in the preparation and publication of the Fisheries Statistical Report as data had to be re-entered back into the system from physical files. Furthermore, the SFA did not have a functional website when the assignment started and, as a result, much of the information that could have easily been published online could not be. The SFA website only came online in February of 2021, 6 weeks before the final version of this report was due. On the other hand, the MFBE had a website but the information that it contained was static and there was no proof it had been recently updated. The change in the Ministry at the end of October 2020 did not improve the situation from the perspective of information available on the website and the name of the website remains that of the Ministry of Fisheries and Agriculture, despite the fact the Ministry had changed its name.

The other issue that I encountered was that there were gaps in information or that information had not been kept in a manner which facilitated the verification on a per vessel basis, such as

for payments for fishing licences, which were sometimes lumped together for several vessels. While it was not possible to fully compile the list of information for the vessel registry and for payment of large-scale fishing vessel licences, I worked with the staff of the SFA to compile information that was available into an Excel spreadsheet. There were gaps in the information compiled, as it was not possible to get access to all physical files containing licence fee payments. This was because some of these files had been damaged as a result of a mould infestation at the SFA Head Office. Gaps in the information compiled is being attended to by the SFA and is being used to compile post-2019 information so as to facilitate consolidation and publication of information as well as to facilitate the process of compiling the 2020 FiTI report. It was not possible to address all of the gaps in information for the year 2019 as a result of time constraints. However, the initial list of recommendations made by the National MSG are relevant and ambitious and, if implemented in time, would greatly improve Seychelles' compliance to the FiTI during its next reporting period.

I was, however, disappointed with the level of participation and comments on the preliminary findings from the National MSG and participation in the virtual meeting to discuss the first draft of the FiTI report. Only six of the 12 members of the National MSG attended the virtual meeting to discuss the first draft of the FiTI report and written comments were received only from the youth representative of the National MSG. Furthermore, it appears that some members of the National MSG that attended the virtual meeting were not actively participating in the discussion as there were no responses from them when they were specifically prompted.

I am of the opinion that discussions and interactions on the initial draft reports by the National MSG were affected by the COVID-19 situation and restrictions in movement and gathering imposed by the Seychelles authorities. The review of the penultimate draft of the report generated greater attendance and much more participation and discussion by the members of the National MSG and greatly improved the final product. The succinctness and readability of the FiTI report significantly improved with each new draft and have most probably made it easier for members of the National MSG to understand its content and objectives. The National MSG was supportive of the FiTI report preparation process and deserves my gratitude for having guided the preparation of Seychelles' first report to the FiTI.

I would like to take this opportunity to thank all of the stakeholders who have taken time to provide requested information and discuss various components of the report with me either in person, through emails, or virtual meetings. I would also like to thank the National MSG for their guidance and also the FiTI International Secretariat for supporting this reporting process.

Jude P. Bijoux

FiTI Report Compiler for the calendar year 2019

Victoria, Seychelles

Annex B. Consultations for providing the FiTI Report

Seychelles Fishing Authority (SFA)

- ➔ Mr Calvin Gerry, Deputy Chief Executive Officer
- ➔ Mr Johny Louys, Monitoring Control and Surveillance Manager
- ➔ Mr Vincent Lucas, Chief Fisheries Officer, Fisheries Management Section
- ➔ Ms Elisa Socrate, Principal Fisheries Officer, Fisheries Management Section
- ➔ Ms Karyss Auguste, Assistant Manager, Licence and Permit Section
- ➔ Mr Michel Marguerite, Manager, Fisheries Economics Section
- ➔ Mr Sharif Antoine, Economist, Fisheries Economics Section
- ➔ Mrs Juliette Lucas, Statistics Manager, Fisheries Statistics Division
- ➔ Mr Ronny Antat, Development and Assessment Manager, Post-Harvest and Value Addition Section
- ➔ Mr Rodney Govinden, Manager, Fisheries Research Section
- ➔ Ms Sara Fanchette, Management Accountant, Accounts Section
- ➔ Mr Danny Henriette, Fuel Claims Officer, Finance and Business Development Section
- ➔ Ms Bernadette Gill, Information Services Officer, Information Technology Section

Department of Fisheries

- ➔ Mr Jude Talma, Principal Secretary

Financial Intelligence Unit

- ➔ Mr Benjamin Edmond

Department of Employment

- ➔ Ms Alda Aumeeruddy, Director, Industrial Relations
- ➔ Ms Susan Morel, Chief Policy Analyst
- ➔ Mrs Tara Diallo, Director, Labour Monitoring

Department of Information Communications Technology

- ➔ Mr Benjamin Choppy, Principal Secretary

Department of Foreign Affairs

- ➔ Dr Marina Confait, Principal Secretary
- ➔ Ms Amenda Padayachy, Director General, International Cooperation and Regional Integration Division
- ➔ Mr Terence Malbrook, Project Coordinator

National MSG (as part of group consultation held on 5th February 2021)**National MSG members present were:**

- ➔ Mr Philippe Michaud, National FiTI Lead-Blue Economy
- ➔ Mr Chrystold Chetty, Transparency Initiatives Seychelles
- ➔ Mr David Bentley- Sea Harvest
- ➔ Mr Roy Clarisse, Special Advisor- Department of Fisheries attended on behalf of Principal Secretary Mr. Jude Talma
- ➔ Ms Gabriella Gonthier, Youth Representative
- ➔ Mr Grant Heyer, representing the Civil Society Organisations-Citizens Engagement Platform Seychelles (CEPS).

Other invitees present were:

- ➔ Ms Fatime Kante- National FiTI desk officer, Ministry of Fisheries and the Blue Economy
- ➔ Mr Abel Sorry- National FiTI desk officer (alternate), Ministry of Fisheries and the Blue Economy
- ➔ Ms Stephanie Radegonde- Ministry of Fisheries and the Blue Economy

Preliminary findings and four earlier drafts of the FiTI Report were circulated to all members of the FiTI National MSG for review and comments.

Regular consultations with the FiTI International Secretariat were also conducted.

Annex C. Additional information for 2019, published only as part of this FiTI Report

List of individuals and businesses licenced to operate in Seychelles' sea cucumber fishery for 2019

No.	Licence Holder		Address	Vessel Name	SZ No.
1	Agnele Pillay	Individual	Baie Lazare	Muscadin	256
2	Ai Qin Wang	Individual	Mare Anglaise	Vainqueur	1606
3	Beche De Mer PTY LTD	Organisation	Mare Anglaise	Brizar	1198
4	Charles Marzocchi	Individual	Anse Etoile	Great White	525
5	Charlماغne Fontaine	Individual	Glacis	Orca	1291
6	Courgette De Mer(Pty) Ltd	Organisation	Providence	Eureka	1099
7	Daught Sauzier	Individual	Cascade	Etelis	101
8	David Cupidon	Individual	Bel Ombre	Labriz	1059
9	Deep Ocean Pty Ltd	Organisation	Barbarons	Lasirans	258
10	Franky Jean	Individual	Providence	Phoenix Rising	701
11	Gaetan Payet	Individual	Bel Ombre	Croix Du Sud	633
12	Georges Payet	Individual	Bel Ombre	Nael	1829
13	Gino Lespoir	Individual	Anse Etoile	Faith	1146
14	Melton Charles	Individual	Roche Caiman	Lady Mary	723
15	Paradise Sea Cucumber (Pty) Ltd	Organisation	Bel Ombre	Pti Frer	1579
16	Pascal Lesperance	Individual	Takamaka	Ti Lans	1358
17	Patrick Port-Louis	Individual	Anse Etoile	Anonyme	1196
18	Paul Morin	Individual	Au Cap	Galate	326
19	Paul Oreddy	Individual	Foret Noire	St Paul	1759
20	Rallis Julius	Individual	Belonie	Blue Chaser	975
21	Ralph Jeannevol	Individual	Belonie	Pluto	1104
22	Robin Larose	Individual	Bel Ombre	Dolphin	183
23	Roy Naya	Individual	North East Point	Escapade	788
24	T&F Fishing	Organisation	Plaisance	Zekler	325
25	Timothy Morin	Individual	Plaisance	Loraz	324

List of foreign vessels apprehended for illegal fishing in Seychelles' waters

Vessel name	Flag State	Outcome
Nuwan Putha (IMUL- A- 0831- KLT)	Sri Lanka	Successfully prosecuted and convicted
Nuwan Putha 10	Sri Lanka	Released based on lack of evidence
Hirun Putha	Sri Lanka	Successfully prosecuted and convicted
Speed Bird	Sri Lanka	Successfully prosecuted and convicted
Maduka	Sri Lanka	Successfully prosecuted and convicted
Pevoni (D1930743)	Comoros	Successfully prosecuted and convicted
Shane Gri La	Madagascar	Successfully prosecuted and convicted

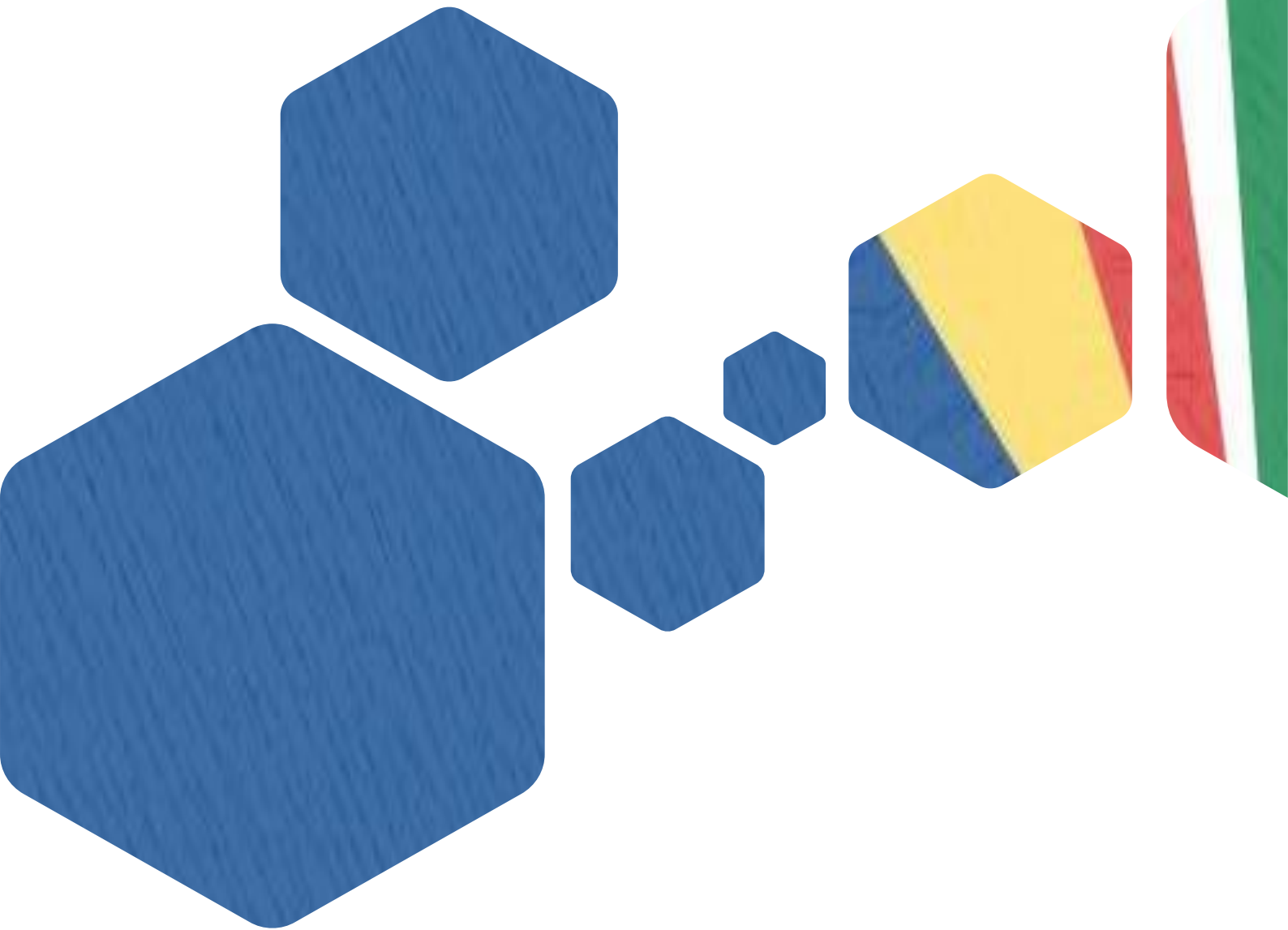
Tabular comparison of Foreign Fishing Agreements granting access to fish in Seychelles' waters

	European Union	Mauritius	TTA	TFI	Dongwon
Term of agreement:	2014 – 2020	2017 – Unknown	Unknown; automatic renewal	Unknown; automatic renewal	Unknown
Financial compensation for 2019 (as stated in the agreement):	<p>To be paid by the European Union (annually):</p> <ul style="list-style-type: none"> - EUR 2,500,000 for access to Seychelles' EEZ, equivalent to a reference tonnage of 50,000 Mt/year - EUR 2,500,000 for the support and implementation of Seychelles' sectoral fisheries and maritime policy 	<p>To be paid by Mauritius-flagged vessels fishing in Seychelles' waters:</p> <ul style="list-style-type: none"> - <i>Purse seiner</i>: USD 110,000/year - <i>Industrial longliner</i>: USD 17,500/six months; USD 30,000/year - <i>Supply vessel</i>: USD 5,000/year 	<p>Vessel licence fee: USD 17,500/six months USD 24,000/year</p>	<ul style="list-style-type: none"> - Vessel licence fee: USD 17,500/six months USD 24,000/year 	Unknown
	<p>To be paid by the ship owners:</p> <ul style="list-style-type: none"> - <i>Purse seiners</i>: Advance payment of EUR 52,500/vessel - <i>Longliners (>250 GRT)</i>: Advance payment of EUR 9,000/vessel 				

	European Union	Mauritius	TTA	TFI	Dongwon
	<ul style="list-style-type: none"> - <i>Longliners (<250 GRT)</i>: Advance payment of EUR 6,750/vessel 				
	<p>To be paid by the ship owners:</p> <ul style="list-style-type: none"> - [All] Excess catch at EUR 75 per Mt of fish caught 				
Number of vessels licenced:	<p>Total of 46 vessels, thereof:</p> <ul style="list-style-type: none"> - 40 purse seiners - 6 industrial longliners - Supply vessels (not stipulated) 	<p>Total of 42 vessels, thereof:</p> <ul style="list-style-type: none"> - 15 purse seiners - 20 industrial longliners - 7 supply vessels 	Unknown	Unknown	Unknown
Flags of licenced vessels:	Flag of a Member State of the European Union	<ul style="list-style-type: none"> - Mauritius 	<ul style="list-style-type: none"> - Taiwan (POC) - Vessels under the Japanese flag also operate under this agreement 	<ul style="list-style-type: none"> - China - Seychelles (all Seychelles-flagged industrial longliners operate under this agreement) 	<ul style="list-style-type: none"> - South Korea
Other aspects	<ul style="list-style-type: none"> - Only foreign access agreement that has been ratified by the National Assembly of Seychelles. 	<ul style="list-style-type: none"> - There are two separate agreements: one to fish in Seychelles' waters (referred to here), and one to fish in Mauritius' waters. 	<ul style="list-style-type: none"> - Private agreement 	<ul style="list-style-type: none"> - Private agreement 	<ul style="list-style-type: none"> - Private agreement

Summary of stock status of species (assessed by SFA since 2017)

Species	Common name	Creole name	Period	Year of publication	Stock status	
					Fishing mortality	Biomass
<i>Lutjanus sebae</i>	Emperor red snapper	Bourzwa	2017	2018	Subjected to overfishing	Overfished
<i>Epinephelus chlorostigma</i>	Brown-spotted grouper	Vyey Makonde	2017	2018	Uncertain	Overfished
<i>Aprion virescens</i>	Green jobfish	Zob gri	2017	2018	Uncertain	Overfished
<i>Siganus spp.</i>	Rabbitfish	Kordonyen	2017	2018	Not subjected to overfishing	Not overfished
<i>Carangoides fulvoguttatus</i>	Yellowspotted trevally	Karang plat	2017	2018	Uncertain	Overfished
<i>Carangoides gymnostethus</i>	Bludger	Karang balo	2017	2018	Uncertain	Overfished
<i>Euthynnus affinis</i>	Kawakawa	Bonit fol	2017	2018	Not subjected to overfishing	Not overfished
<i>Panulirus penicillatus</i>	Pronghorn spiny lobster	Oumar	2019	2019	Uncertain	Not overfished
<i>Panulirus longipes</i>	Long-legged spiny lobster	Oumar	2019	2019	Uncertain	Not overfished
<i>Holothuria fuscogilva</i>	White teatfish	Kokosye blan	2017	2017	Subjected to overfishing	Overfished
<i>Holothuria sp.</i>	Flower teatfish	Banbara pentard	2017	2017	Subjected to overfishing	Overfished
<i>Thunnus albacares</i>	Yellowfin tuna	Ton Zonn	2016	2017	Subjected to overfishing	Overfished
<i>Thunnus obesus</i>	Big eye	Ton gro lizye	2016	2017	Not subjected to overfishing	Not overfished
<i>Katsuwonus pelamis</i>	Skipjack tuna	Ton reye	2016	2017	Not subjected to overfishing	Not overfished
<i>Xiphias gladius</i>	Swordfish		2017	2017	Not subjected to overfishing	Not overfished
<i>Istiophorus platypterus</i>	Indo-Pacific sailfish	Dyab lavwal	2016	2017	Subjected to overfishing	Not overfished
<i>Makaira nigricans</i>	Blue marlin	Marlin	2016	2017	Subjected to overfishing	Not overfished
<i>Tetrapturus audax</i>	Striped marlin	Marlin	2016	2017	Subjected to overfishing	Overfished



Seychelles' 1st Report to the Fisheries Transparency Initiative (FiTI)

| Calendar year: 2019