



Fisheries  
Transparency  
Initiative

# Validation of the Republic of Seychelles

**Compliance Statement  
of the FiTI International Board  
regarding progress in implementing  
the FiTI Standard (January 2022 – July 2024)**

**Date: 24 February 2025**

## Purpose of this document

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

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

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

The Republic of Seychelles (short 'Seychelles') underwent its **second regular validation**. Under the FiTI Standard (section D.1), the FiTI International Board launched the country's validation process in July 2024, and it ended in January 2025. The Board set the period under validation from January 2022 until July 2024. Consequently, Seychelles' third FiTI Report (covering the calendar year 2021) and fourth FiTI Report (covering the calendar year 2022) fall within the timeframe under validation, as well as any other actions and progress achieved until July 2024.

**This Compliance Statement documents the FiTI International Board's final assessment for the second regular validation process of the Republic of Seychelles.**

The Seychelles' FiTI validation process for the above-mentioned period has concluded. The FiTI International Board decision on Seychelles' overall compliance designation for this validation process is final and cannot be appealed. This Compliance Statement, including its annexes, is publicly available on the FiTI website. Comments and questions are welcomed and should be directed to the FiTI International Secretariat (Ms Dorothea Garff, Validation Coordinator, [dgarff@fiti.global](mailto:dgarff@fiti.global)).

## 1) The FiTI validation process

The implementation of the FiTI Standard and the validation process is informed by some core principles around which this initiative was created.

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

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

impact of the FiTI on the sustainable management of a country's marine fisheries. As such, the validation process is beneficial for national stakeholders in validated countries as well as for FiTI's international stakeholders (e.g., business partners, donors, etc.).

However, the validation process should **not be mistaken as a purely technical, audit-like exercise**. Instead, when determining a country's level of compliance, the validation process must balance the outcomes of a detailed, evidence-based assessment of a country's performance against the individual requirements of the FiTI Standard (as outlined in its sections B.1 to B.3) with the overall perception of the country's performance against the spirit of the initiative – as documented in the FiTI Principles.

In addition, **it is indispensable to consider the context** in which fishing activities and the implementation of the FiTI happen in the country.

Under the general principle of **'contextual mindfulness'**, validation needs to ascertain whether a current status or demonstrated progress correlates with the significance, relevance, and intent of the letter and spirit of the requirement, even if not all technical aspects have been fully complied with.

The FiTI emphasises the need for national authorities to develop and strengthen their systems for collating and publishing information online in a complete and accessible manner. For this, the country's National Multi-Stakeholder Group (MSG) produces annual FiTI Reports that assess the availability, accessibility, and completeness of information in the public domain for all transparency requirements set forth in the FiTI Standard. Where available information is not yet published on government websites, the National MSG can utilise FiTI Reports to publish such information, but only as an interim mechanism. **The goal of the FiTI is to ensure national authorities establish credible and comprehensive systems for publishing information on the fisheries sector online.** Consequently, implementing countries must demonstrate progressive improvement over time in collating and publishing accessible and complete information online, if applicable. Thus, the FiTI does not expect all countries to have all the data for every transparency requirement from the beginning or even when a country is declared compliant.

At the same time, the FiTI Standard clearly states a **minimum threshold that must be achieved by countries** to become formally eligible for an overall compliance designation. In accordance with section D.3 of the FiTI Standard, such a threshold is achieved if

- a “compliant” designation on the assessment of the individual requirements regarding enabling environment for stakeholder participation and multi-stakeholder oversight (B.3.1 and B.3.3), and
- at least “meaningful progress” designations on the assessment of the individual transparency requirements (B.1) are achieved.

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The decision regarding the country's overall compliance level is determined by the designation categories stated in section D.1.1 of the FiTI Standard.

For more information about the FiTI validation process, please refer to the FiTI Standard (section D) as well as the accompanying Guidance Note #3 'Validating countries'.<sup>2</sup>

## 2) Seychelles' validation process

The assessment of Seychelles' compliance with the FiTI Standard was comprised of three phases, each building on the conclusions and recommendations of the previous phase, as shown below. Consequently, this Compliance Statement – the final phase of the validation process – should be read considering the outputs of the other two phases, as well as the overall parameters set up by the FiTI Standard and Guidance Note 3. The core deliverables of the first and second phases of the process can be found in Annex I and Annex II of this document.

FiTI Standard	Section D.2.1	Section D.2.2	Section D.2.3
<b>Deliverables</b>			
<b>Responsibility</b>	FiTI International Secretariat	Independent Validator	FiTI International Board
<b>Status</b>	<input checked="" type="checkbox"/> 30 August 2024 (Annex I)	<input checked="" type="checkbox"/> 27 December 2024 (Annex II)	<input checked="" type="checkbox"/> 24 February 2025

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<sup>2</sup> <https://fiti.global/validation>

In the **first phase**, the FiTI International Secretariat prepared a Baseline Assessment Report (Annex I), which provided the Secretariat's initial evaluation of progress against the requirements of the FiTI Standard.<sup>3</sup> Primarily through desk-based research, the International Secretariat:

- Determined the level of compliance for each of the 21 individual validation requirements:
  - Transparency (comprised of 12 individual requirements);
  - Procedural related to the FiTI Report (comprised of 4 individual requirements),
  - National Implementation Framework (consists of 5 individual requirements);
- Documented the direction of progress for the 21 individual validation indicators;
- Documented efforts that exceeded and went beyond FiTI requirements;
- Evaluated the progressive improvement and implementation status of the recommendations made by the MSG and due within the validation timeframe; and,
- Provided further recommendations to strengthen the FiTI implementation process further.

The Baseline Assessment Report was shared with the Chair of the FiTI International Board in August 2024 to receive comments and finalised in the same month. The report was then submitted to the Independent Validator once he was appointed.

In the **second phase**, the FiTI International Board chose Mr Stefaan Depypere as the country's Independent Validator.<sup>4</sup> Primarily through stakeholder consultations<sup>5</sup> (and complementary research), the Independent Validator:

- Reviewed the Secretariat's baseline assessment of each individual requirement as well as the country's progress performance;
- Identified opportunities to improve further the operational effectiveness as well as the impact of the national FiTI implementation in terms of promoting sustainable fisheries management; and

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<sup>3</sup> During its 25th meeting (July 2024), the FiTI International Board approved that the first step of the validation process for Seychelles be conducted by the FiTI International Secretariat. Such step entailed a detailed desk review of the countries' compliance with the individual requirements of the FiTI Standard. On the other hand, the responsibility of conducting stakeholder interviews to provide objective verification of the assessment of each individual requirement, as well as to determine lessons learned and a recommendation for the overall compliance designation, was the exclusive purview of the Independent Validator. The Independent Validator's draft report was provided to the countries' National MSG for feedback before the final version was submitted by the Independent Validator to the FiTI International Board.

<sup>4</sup> As per 25<sup>th</sup> meeting of the FiTI International Board, 2 July 2024 (BM-25\_2024\_D-01).

<sup>5</sup> During a site visit to the Seychelles from 21 to 25 October 2024.

- Provided a recommendation for the overall country compliance designation, following the categories stated in section D.1.1 of the FiTI Standard.

The Independent Validator documented his findings in the Validation Report (See Annex II), which also included feedback from the FiTI National Lead and the National MSG regarding the preliminary findings (obtained during a feedback process during the month of December 2024).

The Independent Validator assessed the implementation of all the individual transparency requirements, and for the most part, his assessment coincided with that of the FiTI Secretariat included in the Baseline Assessment Report. The Independent Validator diverged in two cases from the International Secretariat's assessment, documented in the Baseline Assessment Report:

- For the transparency requirement 'Small-Scale Fisheries,' the Validator increased the scoring of one indicator (B.1.6\_7), which resulted in a better compliance determination for this requirement, changing from 'meaningful progress' to 'compliant.' The Validator argued that several studies had been published following a recommendation from the National MSG, which should support a decision to change the qualification to compliant.
- For the national implementation framework requirement 'Annual Workplan,' the Validator also increased the scoring of one indicator (B.3.4\_3) from 'inadequate progress' to 'meaningful progress,' as the country published its work plan after the Baseline Assessment Report was completed. The new scoring resulted in the compliance determination changing from 'inadequate progress' to 'meaningful progress.'

The Independent Validator also concluded that there had not been any breaches of the FiTI principles or spirit during the validation timeframe, as per section E.2.2 of the FiTI Standard.

The Independent Validator submitted his final Validation Report for Seychelles to the FiTI Chair on December 27, 2024.

In the **third and final phase**, the FiTI International Board set up a Board Committee and reviewed the assessments and recommendations documented in the Independent Validation Report. The FiTI International Board decided on the final overall country determination during its 27<sup>th</sup> meeting on January 23, 2025.<sup>6</sup>

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<sup>6</sup> The FiTI International Board did not find it necessary to conduct additional research or stakeholder interviews and relied on the documents provided in phases 1 and 2 of this validation process as stated by the FiTI Standard.

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Compliance statement of the FiTI International Board regarding progress in implementing the FiTI Standard  
(January 2022 – July 2024)

The following table provides a **chronological overview of Seychelles' validation process**:

<b>Current FiTI country status:</b>	FiTI Candidate country (as of 3 April 2020) <sup>7</sup>
<b>Request of validation process:</b>	FiTI International Board, Decision: BM-25_2024_D-01 <sup>8</sup>
<b>Type of validation:</b>	Second regular validation
<b>Timeframe of validation:</b>	January 2022 until July 2024
<b>FiTI Reports published within the validation timeframe:</b>	<ul style="list-style-type: none"><li>➔ 2021 FiTI Report, published on 28 February 2023</li><li>➔ 2022 FiTI Report, published on 12 April 2024</li></ul>
<b>Baseline Assessment Report:</b>	Baseline Assessment Report finalised by FiTI International Secretariat on 30 August 2024 (and submitted to Independent Validator, once he was appointed) → Refer to Annex I
<b>Validation Report:</b>	Validation Report submitted by Independent Validator (Mr Stefaan Depypere) to FiTI International Board on 27 December 2024 → Refer to Annex II
<b>Compliance Statement:</b>	<ul style="list-style-type: none"><li>➔ Overall compliance designation approved by the FiTI International Board on 23 January 2025</li><li>➔ Compliance Statement finalised by FiTI International Board (through designated Validation Committee) on 24 February 2025 and send to the Government of Seychelles on 27 February 2025.</li></ul>

<sup>7</sup> <https://fiti.global/seychelles-is-granted-fiti-candidate-country-status>

<sup>8</sup> 25<sup>th</sup> meeting of the FiTI International Board, 2 July 2024

### 3) Assessment of Seychelles’ overall compliance

Based on the recommendation of the Board Committee that reviewed the Validator’s report and recommendation, the FiTI International Board assessed and decided on Seychelle's overall compliance, considering provision E.2.2 of the FiTI Standard about the possible breach of principles and spirit of the initiative. The Board also considered provision D.1.2. which states that the FiTI International Board evaluates the overall compliance with the FiTI Standard based on the assessment of the individual FiTI requirements and considering the following factors:

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

In assessing an implementing country’s overall compliance, the FiTI International Board applied the same designations used to assess the individual requirements as outlined in provision D.1.1 of the FiTI Standard. **The most important outcome of the validation process is the decision regarding the country’s level of overall compliance following the designation categories outlined below:**

Compliance designations	Description
<b>Compliant</b>	Validation demonstrates that all aspects of the requirement have been implemented and that the broader objective of the requirement has been fulfilled.
<b>Meaningful progress</b>	Validation demonstrates that significant aspects of the requirement have been implemented and that the broader objective of the requirement has been fulfilled.
<b>Inadequate progress</b>	Validation demonstrates that significant aspects of the requirement have not been implemented and that the broader objective of the requirement has not been fulfilled



<b>No progress</b>	Validation demonstrates that all or nearly all aspects of the requirement have not been implemented and that the broader objective of the requirement is far from being fulfilled
<b>Not collated</b>	<i>Validation demonstrates that information for this requirement has not been collated by national authorities at all.</i>
<b>Not applicable</b>	<i>Validation demonstrates that this requirement is not applicable in the country.</i>

#### 4) The FiTI International Board’s decision

Validation is the FiTI’s quality assurance mechanism for assessing implementing countries' ability to meet the provisions of the FiTI Standard.

**On 23 January 2025, the FiTI International Board determined that Seychelles achieved an overall ‘Compliant’ status in implementing the FiTI Standard during the validation timeframe (January 2022 - July 2024).<sup>9</sup>**

The Board's decision was taken unanimously. Mr. Roy Clarisse, who was nominated to the FiTI International Board by the Seychelles government, abstained from participating in the decision or voting as required by the Constitution of the FiTI association.

The result of this validation makes Seychelles the first country to achieve ‘compliant’ status with the FiTI Standard within the above-stated validation time frame. The FiTI International Board congratulates Seychelles on this significant accomplishment, demonstrating that all necessary aspects of the validation requirements have been met.<sup>10</sup> The results of the second validation of Seychelles underline the considerable progress the country has made toward achieving transparency in its fisheries sector management since joining the FiTI. **Within its second period under Validation, the country continuously increased the amount of available information on government websites and improved the quality, accessibility, and understandability of the data in the public domain.** A worthy example is SFA’s Fisheries Information Management System (FIMS), which provides the foundation for publishing fisheries information regarding several of the FiTI’s transparency requirements in an easy-to-understand format. The validation process’s findings made the case that the country has initiated an approach to moving from ‘static’ transparency, where data is

<sup>9</sup> Decision ID: BM-27\_2025\_D-01

<sup>10</sup> The validation of Seychelles covered a total of 21 *individual validation requirements*, as set forth in sections B.1., B.2. and B.3 of the FiTI Standard:

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

published once a year through FiTI Reports or other means, such as SFA’s statistical reports, toward a more ‘dynamic’ and timely transparency. While it is recognised that the FIMS is not yet publishing data in more frequent intervals than annual updates, it provides a crucial means to further enhance the transparency of fisheries management in the future. Further improvements over the following years are expected.

The validation also showed significant progress in the performance of its National MSG—comprising representatives from government, business, and civil society – as well as more effective operational support provided by the country’s FiTI National Secretariat for the implementation process. Several MSG members and other stakeholders agreed that the National MSG, supported by the FiTI National Lead, is fostering an environment of open public debates and citizen participation. The National MSG members are actively engaged and feel free and encouraged to raise concerns or criticism, which in turn reflects the government’s tone from the top and commitment to the FiTI. Notable examples of the country’s commitment to good governance and transparency include its continuous improvement of the requirements under the Open Government Partnership through compliance with the FiTI Standard, and vice versa.<sup>11</sup>

Nevertheless, this validation process has identified **opportunities for further improvement** to maintain the overall compliance status with the FiTI, particularly regarding the lack of available of some information covered by the FiTI Standard on government websites, and further improving the quality, accessibility, and understandability of the data in the public domain. Likewise, the government must continue to consolidate and institutionalise its support for the National MSG and ensure more effective cooperation among different governmental actors to improve the FIMS continuously.

The FiTI International Board has, therefore, in this Compliance Statement, set out **eight corrective actions (see below)** that the Seychelles’ government must address to maintain its status of ‘compliant.’ Progress in addressing these corrective actions (see Chapter Six) will be monitored by the FiTI International Board and assessed during the country’s subsequent regular validation, scheduled to start in August 2027. The FiTI International Board emphasises that even when a country has been found to be compliant as a result of a validation process, it must maintain the level of transparency already achieved, demonstrate further improvements in the future based on the recommendations and, address the corrective actions included in the Compliance Statement issued by the FiTI International Board. Only under those circumstances will the country maintain its current compliance level designation, which would be assessed in future validations. In accordance with section E.2.3 of the FiTI Standard, failure to achieve satisfactory progress during the subsequent regular validation would result in a lower compliance designation.

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<sup>11</sup> <https://www.opengovpartnership.org/members/seychelles/commitments/SYC0005/>

## 5) Final Validation Scorecard

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

<b>Seychelles: Validation Scorecard (January 2022 – July 2024)</b>						
Requirements of the FiTI Standard (section B)	Level of compliance <sup>12</sup>					Direction of progress <sup>13</sup>  <i>Compared to previous validation(s): No change – worse – better (choose one)</i>
	Compliant	Meaningful progress	Inadequate progress	No progress	Exceeding (if applicable)	
<b>B.1 Transparency requirements</b>						
B.1.1 Public Registry of National Fisheries Laws, Regulations and Official Policy Documents						<i>Better</i>
B.1.2 Fisheries Tenure Arrangements						<i>No change</i>
B.1.3 Foreign Fishing Access Agreements						<i>Better</i>
B.1.4 The State of the Fisheries Resources						<i>No change</i>
B.1.5 Large-Scale Fisheries						<i>No change</i>
B.1.6 Small-Scale Fisheries						<i>Better</i>
B.1.7 Post-Harvest Sector and Fish Trade						<i>No change</i>
B.1.8 Fisheries Law Enforcement						<i>Better</i>
B.1.9 Labour Standards						<i>No change</i>
B.1.10 Fisheries Subsidies						<i>Better</i>

<sup>12</sup> **Efforts exceeding the FiTI requirements** apply to all encouraged activities (should, may). Guidance Note #3, page 24: “The FiTI Standards lists multiple examples within sections B.1 to B.3 that are considered as optional actions or activities to further strengthen transparency and participation in the country....” “For example, to further strengthen the dissemination of a FiTI Report and stimulate public debates, National MSGs are encouraged to contribute the lessons learnt and recommendations from FiTI Reports to policy dialogues and broader conversations about national reform efforts (section B.2.4 of the FiTI Standard)”. Those efforts should be documented during the validation process and recognised in the Validation Scorecard, column ‘Exceeding’ but are not considered when assessing compliance with the FiTI Standard.

<sup>13</sup> **Direction of progress:** The International Secretariat in the Baseline Assessment Report conducts an evaluation of the country’s direction of progress in terms of meeting each FiTI requirement in comparison to the country’s most recent validation(s), indicating whether implementation is improving or deteriorating (either as ‘no change’, ‘worse than before’ or ‘better than before’). This aspect is, therefore, only relevant for the second and subsequent country validations.

<b>Seychelles: Validation Scorecard (January 2022 – July 2024)</b>						
Requirements of the FiTI Standard (section B)	Level of compliance <sup>12</sup>					Direction of progress <sup>13</sup>
	Compliant	Meaningful progress	Inadequate progress	No progress	Exceeding (if applicable)	
						<i>Compared to previous validation(s): No change – worse – better (choose one)</i>
B.1.11 Official Development Assistance						<i>Worse</i>
B.1.12 Beneficial Ownership						<i>No change</i>
<b>B.2 Procedural requirements for FiTI Reports</b>						
B.2.1 Reporting Requirements						<i>No change</i>
B.2.2 Reporting Deadlines and Periods						<i>Worse</i>
B.2.3 Reporting Process						<i>No change</i>
B.2.4 Report Dissemination and Public Debate						<i>No change</i>
<b>B.3 National Implementation Framework</b>						
B.3.1 Enabling Environment for Stakeholder participation						<i>No change</i>
B.3.2 Governance and Support						<i>Better</i>
B.3.3 Multi-Stakeholder Oversight						<i>Better</i>
B.3.4 Annual Workplan						<i>Better</i>
B.3.5 Impact Report						<i>Not applicable</i>
<b>Overall compliance designation</b>						<i>Better</i>
<b>Efforts that go beyond the scope of the FiTI Standard (optional)<sup>14</sup></b>						
<i>None</i>						

<sup>14</sup> **Efforts that go beyond the scope of the FiTI Standard** refers to activities that fall outside the scope of the FiTI Standard. Guidance Note #3, page 24: “For example, the National MSG may decide to include additional transparency requirements (beyond the 12 mandatory requirements stated in section B.1 of the FiTI Standard) into the scope of their annual FiTI Reporting process, such as the impacts of climate change or the interactions between fisheries and other sectors in the Blue Economy”.

### 6) Corrective actions

The FiTI's Board Committee, delegated by the International Board, determined the following corrective actions<sup>15</sup> to be undertaken by Seychelles to remain compliant with the FiTI Standard. The Seychelles National MSG must submit a written report regarding the progress in implementing **these corrective actions to the FiTI International Board no later than 31 March 2026.**

*Under section B.3.2 the National MSG must maintain a properly authorised and resourced FiTI National Secretariat as specified in requirement A.5. An effective, well-resourced, and responsive FiTI National Secretariat is paramount for ensuring that the National MSG can achieve its FiTI-relevant activities and outcomes. Therefore, the FiTI Lead Ministry must:*

- 1) Ensure that sufficient time is allocated to the staff member(s) that supports the National MSG as the country's FiTI National Secretariat.
- 2) Ensure permanent financial support for the national FiTI implementation process, e.g., through a permanent budget line for National MSG activities or via additional donor funding. This would allow for more opportunities to raise awareness about Seychelles' fisheries sector among the wider public, while at the same time providing greater independence of the National MSG and institutionalise regular activities (which is also a target under Seychelles' FiTI-related Open Government Partnership commitment).

*In accordance with section B.2.4 of the FiTI Standard, Seychelles' FiTI National MSG must determine a formalised approach to ensure that the information published through the FiTI implementation process contributes to sustainable policy-making, effective oversight, accountability, and public debates. Therefore, the National MSG must:*

- 3) Discuss opportunities for the National MSG to utilise its already established and formalised multi-stakeholder collaboration, to engage in wider national fisheries management discussions or policies (i.e., beyond transparency).
- 4) Establish procedures to ensure that the FIMS becomes a unified information system that provides relevant and updated fisheries data to the public and gradually phases out the annual provision of FiTI Reports.
- 5) Strengthen its efforts to ensure that fisheries information (via FiTI Reports, the FIMS, or other online media) is widely distributed among key audiences, including government, parliamentarians, companies, civil society groups, academia, the media,

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<sup>15</sup> Some recommendations for corrective actions made by the independent Validator have already been addressed positively, such as the review of the MSG Terms of Reference. (<https://mofbe.gov.sc/wp-content/uploads/2024/09/SYC-FiTI-ToR-Terms-of-Reference-2024.pdf>).

and international stakeholders. Particular attention should be given to ensure relevant information reaches remote stakeholders, such as fishing communities, as well as non-fisheries related stakeholders, e.g., schools or other business sectors.

- 6) Improve collaboration with other public authorities, such as the National Bureau of Statistics, the Ministry of Finance, National Planning and Trade, and the Ministry of Employment, as well as other relevant national stakeholders, such as the Seychelles' Information Commission.

*In accordance with Section B.1 of the FiTI Standard countries must provide accessible and complete information on the fisheries sector in the public domain (i.e., online) according to 12 transparency requirements. At the same time, following the FiTI's key principle of 'progressive improvement', countries must demonstrate improvements over time in collating and publishing information online which is not yet available.* Therefore, the National MSG must:

- 7) Ensure that the following requirements have either been already included in the list of recommendations by the National MSG to the government or, if this has not been the case yet, that new recommendations are issued to improve transparency further progressively:
  - Information required under the FiTI Standard and available to the Seychelles government but which has not yet been made publicly accessible online (e.g., disaggregation of exports at species level); and
  - Information required under the FiTI Standard, which has not yet been collected by the Seychelles government.
- 8) Establish a documented process to regularly (e.g., quarterly) monitor the implementation of all recommendations submitted to the government to progressively improve transparency, as well as the corrective actions from this Compliance Statement and, if needed, issue new recommendations related to the availability, accessibility, understandability of information and (if deemed necessary) regarding stakeholder participation in Seychelles' fisheries management.



Fisheries  
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# Validation of the Republic of Seychelles

# Annex I

Baseline Assessment Report of the  
FiTI International Secretariat  
(January 2022 – July 2024)



# Regular country validation: Baseline Assessment Report for the Republic of Seychelles (January 2022 – July 2024)

**Prepared by:** FiTI International Secretariat

**Date:** 30 August 2024



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## Abbreviations

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

# Country validation: Baseline Assessment Report Seychelles (2022-2024)



- SFA**      Seychelles Fisheries Authority<sup>1</sup>
  
- SFWU**      Seychelles Federation of Workers' Union
  
- SMA**      Seychelles Maritime Academy
  
- SPA**      Seychelles Ports Authority

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<sup>1</sup> Previously named the Seychelles Fishing Authority (as per the Seychelles Fishing Authority (Establishment) Act 1984, which was repealed in July 2024 when the Seychelles Fisheries Authority Act (2024) was enacted).

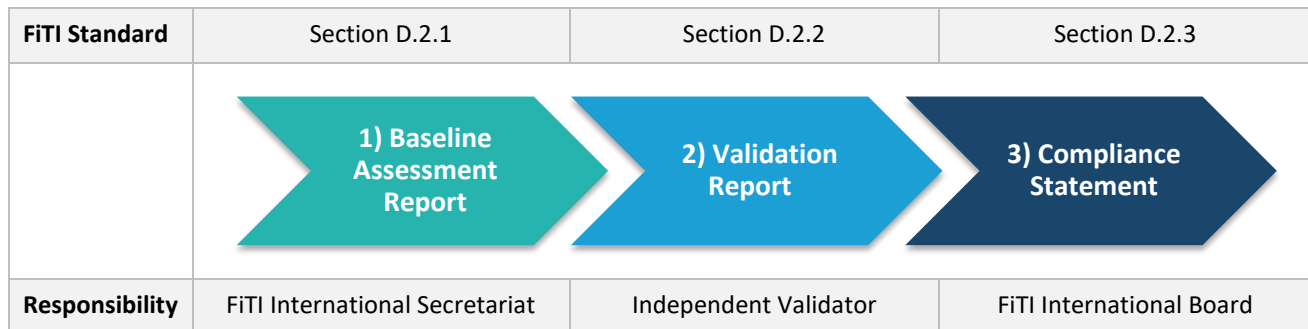
## Executive Summary

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

The provisions that must be applied when conducting validations are set forth in section D of the FiTI Standard.<sup>2</sup>

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

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



For the Republic of Seychelles, the FiTI International Board initiated the country’s **first regular validation process** in line with the FiTI Standard (Section D.1) in September 2021, covering the period from April 2020 to December 2021. This timeframe included Seychelles' first and second FiTI Report for calendar years 2019 and 2020. The [FiTI International Board](#) recognised Seychelles’ efforts to implement the FiTI Standard with a score of ‘meaningful progress’, and issued four corrective actions for Seychelles to undertake which, if properly addressed, could see the country progress to the status of a FiTI Compliant Country. Since then, Seychelles has remained a FiTI Candidate Country.

In accordance with section D.4 of the FiTI Standard, the FiTI International Board has tasked the FiTI International Secretariat to launch the **second regular validation process** for Seychelles (Decision BM-25\_2024\_D-01). The timeframe for this validation was set from January 2022 until July 2024,

<sup>2</sup> <https://fiti.global/fiti-standard>

covering Seychelles' third FiTI Report (calendar year 2021) as well as its fourth FiTI Report (calendar year 2022).

As part of the first validation process step, the FiTI International Secretariat has documented its initial assessment of Seychelles' compliance against the criteria of the FiTI Standard in this report. This assessment was primarily carried out via desk research, without the involvement of national or international stakeholders.<sup>3</sup>

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

## Key findings

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

This assessment underscores that Seychelles has maintained (or even enhanced) its levels of online transparency of fisheries management information in Seychelles (as documented in the country's first Compliance Statement), while at the same time adopting new methods for disseminating information, improving online accessibility, consistently updating their websites with new information, and seeking to enhance stakeholder participation. The third and fourth FiTI reporting processes demonstrated that the government is now making a substantial amount of this information freely accessible online (including as part of the published FiTI Reports, which are available on the SFA and MoFBE websites).

Notable examples of *advancing the transparency requirements of the FiTI Standards* are:

- ➡ A new digital platform was launched by the Seychelles Fisheries Authority (SFA), referred to as the Fisheries Information Management System (FIMS), containing information on large-scale vessel registry, fish stocks, fishing effort, catch data, expert information, etc.
- ➡ Non-disclosure clauses from two foreign fishing access agreements have been removed after renegotiations.
- ➡ The names of license holders for Seychelles' small-scale fisheries, including the sea cucumber and lobster fishery, have been published.
- ➡ The complete catch information from the industrial longline fishery, is now publicly accessible.

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<sup>3</sup> During its 15<sup>th</sup> meeting, the FiTI International Board approved for only the Independent Validator's draft report to be provided to the countries' National MSG for feedback before the final version is submitted by the Independent Validator to the FiTI International Board (Decision-ID: BM-15\_2021\_D\_03).

Several of these advancements in online transparency stem from the efforts of Seychelles' government to implement *recommendations made by the country's National Multi-Stakeholder Group (MSG)*. Since the beginning of the FiTI reporting process, the National MSG determined 69 recommendations, of which 32 recommendations have been implemented so far and demonstrate progressive improvement towards fisheries transparency. The status of the 37 remaining recommendations, which have not yet been completely implemented is as follows:

- ➡ 22 recommendations are in the process of being implemented (thereof 5 recommendations overdue);<sup>4</sup>
- ➡ 13 recommendations remain open (thereof 8 new recommendations introduced in the 2022 FiTI Report); and
- ➡ 2 recommendations have been cancelled by Seychelles' national authorities.

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

- ➡ Reasons for the absence of written procedures to join the sea cucumber fishery published.
- ➡ Clarification whether government financial transfers or subsidies are given to the country's large-scale commercial fisheries sector (addressing corrective action #4 of Seychelles' 1<sup>st</sup> compliance statement).

Furthermore, the FiTI International Board issued in its first Compliance Statement (15 February 2023) one *corrective action* relating to transparency requirements.<sup>5</sup> This has been addressed by the National MSG during this validation timeframe by stating in the 2021 FiTI Report that Seychelles' national authorities confirmed that no subsidies are provided to the large-scale commercial fisheries sector in Seychelles. Partial information on small-scale fisheries subsidies is available, and the Ministry of Fisheries and Blue Economy (MoFBE) has commissioned a study to identify all public sector support to the fisheries sector to fully comply with transparency requirement B 1.10 of the FiTI Standard.

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<sup>4</sup> A sixth recommendation, due by December 2022, is also already in the process of being implemented.

<sup>5</sup> Correction action #4: "In accordance with section B.1.10 of the FiTI Standard, Seychelles' FiTI National MSG must clarify whether government financial transfers or subsidies are given to the country's large-scale commercial fisheries sector, and if so, all the relevant information should be published in accordance with this section."

At the same time, both FiTI Reports made transparent the *remaining information gaps* as well as obstacles hindering the full online accessibility of government information. This includes, for example, that:

- ➡ the competent governmental authorities have not confirmed or published a list of SFA staff authorised to issue licenses and permits (transparency requirement B.1.2);
- ➡ fisheries law enforcement data, in particular on convictions due to offenses in the fisheries sectors is only published in FiTI Reports and does not include names of vessel owners or incident dates (transparency requirement B.1.8)
- ➡ no comprehensive information on resources deployed by all relevant national authorities to ensure compliance with national fisheries legislation is provided (transparency requirement B.1.8);
- ➡ no catch data for calendar year 2022 has been published for Seychelles' artisanal fishery (SFA stated that this was due to challenges related to upgrading of the data processing and reporting system for this fishery) (transparency requirement B.1. 6);
- ➡ there is still incomplete information on the quantity of fish and fish products produced (transparency requirement B.1.7);
- ➡ national authorities have not yet collated reliable information on total employment in Seychelles' fisheries sector (transparency requirement B.1.7);
- ➡ there is still no online repository of fisheries and marine conservation related public sector projects (however, information has been consolidated as part of the FiTI reporting process and published in both FiTI Reports) (transparency requirement B.1.11);
- ➡ the commissioned gap analysis of beneficial ownership in the fisheries sector and the study towards a legal framework for joint ventures has not been published yet (transparency requirement B.1.12);
- ➡ there is still no systematic documentation and publication of stakeholder consultations related to fishing rights in place (for example, the outcomes of stakeholder consultations relating to the review of the Fisheries Act 2014 are not public) (transparency requirements B.1.2 and B.1.3).

It is the FiTI International Secretariat's opinion that the government of Seychelles has shown its commitment to the FiTI principles and there are *no signs of wilfully withholding* information required by the FiTI Standard. When certain information has been unavailable, the competent national authorities offered to the National MSG transparent explanations, acknowledging issues such as

administrative limitations, data corruption from ransomware attacks, and the destruction of physical records due to fungal damage.

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

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

In general, Seychelles has followed *the procedural requirements set out in section B.2.1 of the FiTI Standard* while producing its last two FiTI Reports. Both the 2021 and 2022 FiTI Reports adhered to the National MSG's previous decision to divide the information and findings into two sections: a summary highlighting the key findings and a detailed section that thoroughly assesses the public availability of information required by each of the FiTI Standard's 12 transparency requirements. The reports include references to where mentioned information, such as policy documents or vessel registries, can be accessed by the public. The National MSG also provided wide-ranging *recommendations for the government of Seychelles* on how to further enhance the public availability of accessible, complete, and up-to-date fisheries management information, with 12 recommendations made in the 2021 report and 8 in the 2022 report.

As per the FiTI Standard, at least in every second report, *all 12 transparency requirements* must be covered. For Seychelles, all 12 transparency requirements were covered in both FiTI Reports (2021 and 2022).

Both reports did comply with the *reporting deadline*<sup>6</sup>. However, the FiTI National Lead (on behalf of the National MSG) requested an extension from the FiTI International Board for both Reports, due to delays in securing funding for and recruitment of the Report Compiler as well as leadership changes within the SFA. Both requests were approved by the FiTI International Board (on 5 December 2022 (2021 FiTI Report) and 27 November 2023 (2022 FiTI Report)). Both reports were submitted within the extended time frame.

Additionally, Seychelles' 2021 and 2022 FiTI Reports adhered to the *reporting process* outlined by the FiTI Standard. Both reports were compiled by an external Report Compiler (i.e. Mrs. Daniella Larue), whose appointment was approved by the Seychelles FiTI National MSG. Throughout the reporting processes, the Report Compiler engaged in numerous discussions with relevant stakeholders and was granted extensive access to fisheries information and data held by government

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<sup>6</sup> According to section C.1.2 of the FiTI Standard, an implementing country may apply for an extension if it is unable to meet the required deadlines of FiTI implementation (i.e. publication of FiTI Report, Workplan, Impact Report, as well as undergoing validation) due to exceptional or unforeseen circumstances. The FiTI International Board will assess extension requests by the following criteria.



entities, such as the SFA. She collaborated closely with the National MSG to draft the reports, submitting initial drafts for the group's review and feedback. The National MSG reviewed and formally approved both reports before they were published.

The FiTI National Lead, the FiTI National Secretariat as well as members of the National MSG also enhanced the *distribution of the reports* to key national stakeholders, e.g.:

- The 2022 FiTI Report was presented to President Wavel Ramkalawan and the Cabinet, as well as through various embassies by the Ministry of Foreign Affairs and Tourism;
- A press conference attended by the FiTI National Lead, the FiTI National Secretariat and the Report Compiler, was held at the MoFBE in May 2024;
- Two media training workshops were conducted in May 2023 and July 2024 – in collaboration with the Danny Faure Foundation – which involved participation from various national media outlets and National MSG members;

Despite these efforts, it needs to be recognised that there continues to be a *lack of public debate* around the management of the fisheries sector. Contributing factors include poor media coverage, a weak civil society landscape and a historic underappreciation of the importance of the country's fisheries sectors. While there is anecdotal evidence of stakeholder reactions to the information in the FiTI Reports, these reactions have been largely confined to small circles already engaged in the industry. Significant work remains for the Seychelles' national authorities as well as the National MSG to ensure that fisheries information (including from FiTI Reports) stimulates broader public discussions and inform public decision-making.

A notable example is that *SFA's FIMS*<sup>7</sup>, a significant effort to provide fisheries information in an easy-to-understand format, remains largely unknown by the general public or even other governmental bodies.

Overall, it is acknowledged that the *corrective action* issued in the FiTI International Board's first Compliance Statement – relating to the impact of national FiTI implementations<sup>8</sup> – has not been fully met yet. However, a pilot project was launched - in collaboration with the FiTI International Secretariat and the non-profit organisation People Powered - to identify gaps and challenges within the National MSG and its processes, as well as identifying recommendations for a more inclusive policy-making environment in Seychelles' fisheries sector. The outcomes of this pilot project are expected by the end of 2024.

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<sup>7</sup> <https://sfa-fims.traseable.com/public>

<sup>8</sup> Correction action #3: *"In accordance with section B.2.4 of the FiTI Standard, Seychelles' FiTI National MSG must determine a formalised approach to ensure that the information published through the FiTI implementation process contributes to sustainable policy-making, effective oversight, accountability, and public debates."*

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

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

The government of Seychelles continues to provide and maintain an *enabling environment* for business and civil society participation. This is supported and guaranteed by the country's constitution as well as relevant laws, regulations, and administrative rules. The FiTI International Secretariat has also not become aware of any notable cases where this regulatory framework was not put into practice with regarding the country's FiTI implementation process.

Throughout the entire validation timeframe, the stability of the *FiTI Lead Ministry*, represented by the Department of Blue Economy (DoBE), and the active involvement and dedication of the *FiTI National Lead*, Mr Philippe Michaud, to advancing the process have been key factors for the continued implementation of the FiTI over the past two years.

The Seychelles' FiTI National MSG represents different stakeholder perspectives. Furthermore, and as a result of addressing the *corrective action* issued in the FiTI International Board's first Compliance Statement – relating to the National MSG<sup>9</sup> – the overall group seems more engaged now, despite evidence that few members are still not fully engaged in the MSG's activities (e.g. not attending or contributing to MSG meetings). This revitalised engagement is mainly due to the recruitment of new members of the National MSG as well as enhanced support by the National Secretariat (see below). New members were primarily recruitment as previous members had reached their maximum term limits. Additional efforts are underway to further enhance the effectiveness of the *National MSG* by increasing member participation, reviewing the groups' Terms of Reference, notably to include a role of a rotating Vice-Chair, and discussing the possibility of separating the role of the FiTI National Lead and the Chair of the National MSG. An important enhancement will be the upcoming inclusion of a representatives from the Ministry of Finance in the National MSG. Additional recruitment efforts for other relevant agencies, such as Seychelles' Information Commission, to act as observers to the FiTI implementation process, are already under way.

Nevertheless, challenges with developing the annual workplans persist, leading to some confusion regarding ongoing and planned initiatives and priorities. It seems that the National MSG does not give enough priority to annual work plans to support them in the organisation of their activities.

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<sup>9</sup> Correction action #1: "Under section B.3.3 of the FiTI Standard, the FiTI Lead Ministry must maintain a National MSG to oversee the implementation of the FiTI with representatives from government, business and organised civil society, which is appropriately qualified and fully, actively, and effectively engaged in the FiTI."

Furthermore, the government of Seychelles does not allocate any budget for the support of the National MSG and its outreach endeavours.

Furthermore, the role of the *FiTI National Secretariat* has been clarified and (at least partially) strengthened within this validation timeframe. As a result of addressing the corrective action issued in the FiTI International Board’s first Compliance Statement – relating to the National Secretariat<sup>10</sup> – the Secretariat is now hosted within the FiTI Lead Ministry (i.e. MoFBE, Blue Economy Department), whereas SFA is represented as a full member of the National MSG<sup>11</sup>. In addition, a new staff person has been assigned by the MoFBE to act as the National Secretariat at the beginning of this validation timeframe, but has already been replaced by another staff person. While support provided by the National Secretariat to the National MSG has been seen as increasing over the last months (e.g. in the preparation of meetings as well as certain outreach activities), the frequent exchange of staff persons acting as the Secretariat, as well as a perceived insecurity whether the Secretariat is given sufficient time to perform the duties of a FiTI National Secretariat requires ongoing attention and, if needed, adjustments by Seychelles’ national authorities.

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

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<sup>10</sup> Correction action #2: “As per section B.3.2 of the FiTI Standard, the FiTI Lead Ministry must ensure that administrative and operational support is provided to the National MSG – in the form of a dedicated FiTI National Secretariat.”

<sup>11</sup> This is being proposed as part of the revised ToR which is planned to be confirmed in the next meeting of the National MSG.

## Validation Scorecard

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

<b>Seychelles: Validation Scorecard (January 2022 – July 2024)</b>						
Requirements of the FiTI Standard (section B)	Level of compliance					Direction of progress
	Compliant	Meaningful progress	Inadequate progress	No progress	Exceeding (if applicable)	
<i>Compared to previous validation(s): No change – worse – better (choose one)</i>						
<b>B.1 Transparency requirements</b>						
B.1.1 Public Registry of National Fisheries Laws, Regulations and Official Policy Documents						<i>No change</i>
B.1.2 Fisheries Tenure Arrangements						<i>Worse</i>
B.1.3 Foreign Fishing Access Agreements						<i>Better</i>
B.1.4 The State of the Fisheries Resources						<i>No change</i>
B.1.5 Large-Scale Fisheries						<i>No change</i>
B.1.6 Small-Scale Fisheries						<i>No change</i>
B.1.7 Post-Harvest Sector and Fish Trade						<i>No change</i>
B.1.8 Fisheries Law Enforcement						<i>No change</i>
B.1.9 Labour Standards						<i>No change</i>
B.1.10 Fisheries Subsidies						<i>Better</i>
B.1.11 Official Development Assistance						<i>Worse</i>
B.1.12 Beneficial Ownership						<i>No change</i>
<b>B.2 Procedural requirements for FiTI Reports</b>						
B.2.1 Reporting Requirements						<i>No change</i>
B.2.2 Reporting Deadlines and Periods						<i>Worse</i>

<b>Seychelles: Validation Scorecard (January 2022 – July 2024)</b>						
Requirements of the FiTI Standard (section B)	Level of compliance					Direction of progress
	Compliant	Meaningful progress	Inadequate progress	No progress	Exceeding (if applicable)	<i>Compared to previous validation(s): No change – worse – better (choose one)</i>
B.2.3 Reporting Process	■					<i>No change</i>
B.2.4 Report Dissemination and Public Debate		■				<i>No change</i>
<b>B.3 National Implementation Framework</b>						
B.3.1 Enabling Environment for Stakeholder participation	■				■	<i>No change</i>
B.3.2 Governance and Support	■					<i>Better</i>
B.3.3 Multi-Stakeholder Oversight	■					<i>Better</i>
B.3.4 Annual Workplan			■			<i>No change</i>
B.3.5 Impact Report				■		<i>Not applicable</i>
<b>Overall compliance designation</b> <i>(for Independent Validators and FiTI International Board only)</i>						<i>Not applicable</i>
<b>Efforts that go beyond the scope of the FiTI Standard (optional)</b>						
<i>None</i>						

## Recommendations

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

### Transparency requirements

- ➡ Publish online the following information, which is available to the government, but neither published on a governmental website nor as part of the FiTI Reports<sup>12</sup>:
  - List of SFA staff authorised to issue licenses and permits;
  - Information from previous (prior to 2019) and recent national stakeholder consultations undertaken with respect to the preparation, negotiation or monitoring of foreign fishing access agreements;
  - Names of large-scale vessels (i.e. industrial longline fishery) that do not provide catch data (at all and/or on-time);
  - Detailed information on fish and fish products as well as imports.
- ➡ Publish the following information, which is currently only available as part of FiTI Reports, on government websites:
  - Record of convictions of major offences in the fishing sector, covering detailed requirements as stated in section B.1.8 of the FiTI Standard;
  - Total number of offences committed by employers in the fisheries sector that have been resolved by the authorities;
  - Statement of whether an informal fisheries sector exists in Seychelles;
  - List of fisheries-related public sector development projects.
- ➡ Seek to collate information that is not yet available to national authorities in Seychelles, such as:
  - Comprehensive information on resources deployed by all relevant national authorities to ensure compliance with national fisheries legislation;
  - Reliable information on total employment in Seychelles' fisheries sector.

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<sup>12</sup> This refers only to aspects that have not been addressed by the National MSG as part of their recommendations to the Seychelles' national authorities.

- ➔ Strengthen the information that is already published online on a governmental website:
  - The MoFBE and SFA need to agree whose website would host national fisheries laws, regulations and official policy documents and ensure that this website is comprehensive and updated. Also, brief summaries and supplementary information (e.g. dates of publication for documents) should be provided.
  - The National Bureau of Statistics (NBS) should provide a detailed breakdown of information relating to imports and exports of fish and fish products, for example, by species and country of origins.
  - Update the published summary description of national labor laws to include detailed provisions for workers employed by companies operating in the International Trade Zone (ITZ).

### Procedural requirements

- ➔ Further strengthen the online presentation of fisheries information through the SFA FIMS (e.g. adding of additional data areas, such as subsidies, as well as provision of summarised information (e.g. for vessel registry)).
- ➔ Consider translating key sections of the FiTI Report and related materials into local languages (e.g., Creole) to ensure wider accessibility and understanding among non-English-speaking communities.
- ➔ Determine a formalised approach to how the main findings of the FiTI Report can contribute to public debates on how the fisheries sector is managed, or how this information can feed into public policy making (e.g. from the recent People Powered workshop; see also next section).
- ➔ Include important decisions of the National MSG in its meeting minutes, such as the endorsement of Report Compilers or the approval of annual FiTI Reports. This also includes ensuring all meeting minutes of Seychelles' FiTI National Multi-Stakeholder Group are drafted within the timeframe specified in the ToR for the National MSG and are available online<sup>13</sup>.
- ➔ Ensure that FiTI Reports are published under an open and unrestricted license, such as those developed by Creative Commons, and make users aware that information published in these reports can be reused without prior consent. This is particularly important as the FiTI Reports

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<sup>13</sup> At present (31 July 2024), the minutes of the 16 meetings of Seychelles' FiTI National MSG are published online (<https://mofbe.gov.sc/fiti/documents/>). However, there are no minutes of meetings for the year 2022, due to data loss during the change in National Secretariat that occurred in 2023.

still serve as a primary source of information (i.e. they contain some information that is not yet published anywhere else online).

### **National Implementation Framework**

- ➡ Explore operational synergies with the already established Secretariat for the Open Government Partnership (hosted under the Office of the Vice President of Seychelles).
- ➡ Provide regular training sessions for National MSG members and other stakeholders on the FiTI Standard, validation processes, and the importance of transparency in fisheries management. This will ensure that all participants are well-informed and can contribute actively.
- ➡ Determine annual funding needs for the National MSG and its activities (e.g. meeting & travel costs, outreach activities) and identify external funding opportunities to be pursued by the FiTI Lead Ministry on the group's behalf (e.g. from the EU' sectoral support).
- ➡ Explore opportunities to engage with other FiTI implementing countries for peer-learning experiences on how the FiTI implementation process can be improved.

### **Additional aspects for the consideration of the Independent Validator**

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

- ➡ Engage with stakeholders to explore specific mechanisms for integrating FiTI Report findings into public debates, especially during critical moments such as negotiations on foreign fishing access agreements. This may also include the consideration of evaluating the National MSG's scope of recommendations beyond transparency and participation.
- ➡ Discuss with members of the National MSG how to make meetings more relevant to sustainable fisheries management and accessible to a wider audience and make these meetings less related to administration and governance.
- ➡ Discuss with stakeholders how to improve the dissemination of fisheries data, possibly through the creation of infographics and interactive tools that allow users to explore the information in a user-friendly manner.



## 1) Key parameters and scope of validation

This validation process is based on the following key parameters:

<b>Target country:</b>	Republic of Seychelles (short Seychelles)
<b>Current FiTI country status:</b>	FiTI Candidate country (as of 3 April 2020) <sup>14</sup>
<b>Request of validation process:</b>	FiTI International Board, Decision: BM-25_2024_D-01 <sup>15</sup>
<b>Type of validation:</b>	Second regular validation
<b>Timeframe of validation:</b>	January 2022 until July 2024
<b>FiTI Reports due within validation timeframe:</b>	<ul style="list-style-type: none"> <li>➔ 2021 FiTI Report, submitted on 23 February 2023</li> <li>➔ 2022 FiTI Report, submitted on 25 April 2024</li> </ul>
<b>Responsibility for Baseline Assessment Report:</b>	<ul style="list-style-type: none"> <li>➔ <u>Author:</u> Mr Yannick Memee (FiTI Regional Coordinator for Western Indian Ocean)</li> <li>➔ <u>Reviewer:</u> Dr Karine Young (FiTI Grant Manager), Ms Dorothea Garff (FiTI Validation Coordinator)</li> </ul>
<b>Cut-off date for information to be considered for this report:</b>	31 July 2024

<sup>14</sup> <https://fiti.global/seychelles-is-granted-fiti-candidate-country-status>

<sup>15</sup> 25<sup>th</sup> meeting of the FiTI International Board, 2 July 2024

The scope of this report covers Seychelles’ level of compliance against a total of **21 validation elements**, as defined in sections B.1 to B.3 of the FiTI Standard:<sup>16</sup>

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

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

<sup>16</sup> The requirements for countries intending to implement the FiTI (sign-up steps), as set forth in section A of the FiTI Standard, have already been assessed by the FiTI International Board in April 2020 upon Seychelles’ application to become a recognised FiTI Candidate Country and are therefore not reassessed during validation.

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

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

Compared to Seychelles’ first regular validation, and in accordance with Guidance Note #3, this second regular validation will also address the following two additional aspects:

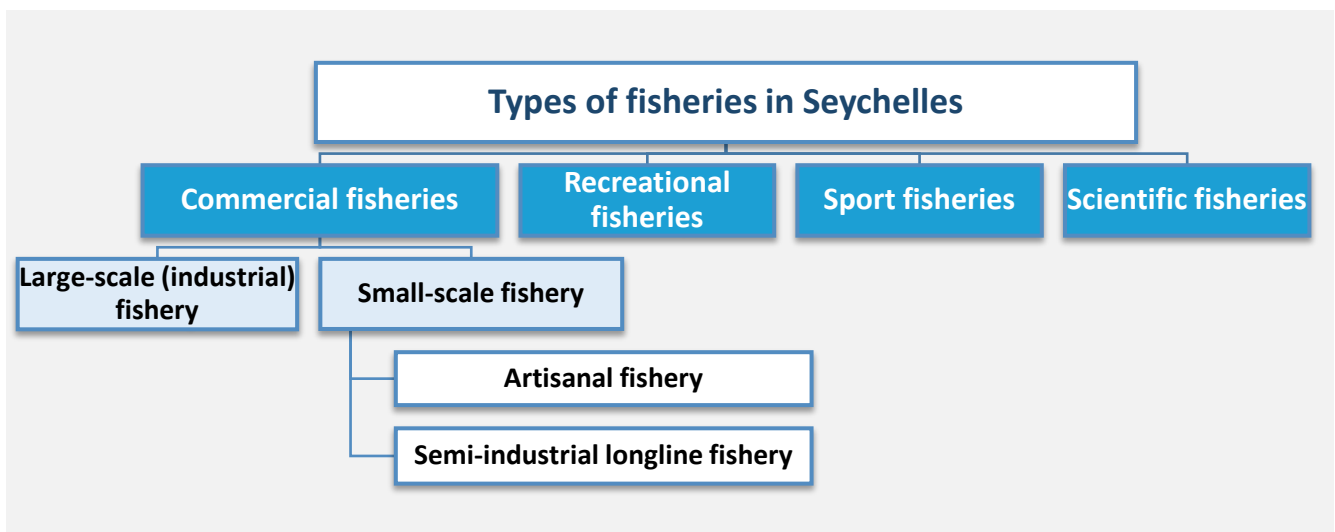
- ➔ the level of *progressive improvement* in making previously unavailable or unpublished information publicly accessible is included in the determination of the level of compliance.
- ➔ the *direction of progress* in meeting each FiTI requirement in comparison to the country’s most recent validation, is evaluated. The direction of progress is an additional aspect to be evaluated for this second, subsequent validation. The evaluation has been made in terms of meeting each FiTI requirement in comparison to the country’s first validation, indicating whether implementation is improving or deteriorating (page 25, Guidance Note #3). The direction of progress is an indication for stakeholders to understand the overall orientation of a requirement. It is not included in the determination of the level of compliance.

This report does not include an overall assessment of compliance.

## 2) Overview of the FiTI implementation in Seychelles

Seychelles is an archipelago in the western Indian Ocean, comprising of 115 islands spread over an Exclusive Economic Zone (EEZ) of 1.37 million km<sup>2</sup>. With a land area of just 455 km<sup>2</sup>, its population of 94,000 is mainly concentrated on three islands (i.e. Mahe, Praslin and La Digue). The country's current and future prosperity is uniquely linked to its marine and coastal assets, with fisheries and tourism being the two main pillars of its economy.

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



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

**Large-scale (industrial fishery):** The industrial fishing sector in Seychelles, focused primarily on tuna, is dominated by foreign-owned vessels, including purse seiners and long-liners. These fleets, largely composed of EU, French, Spanish, Japanese, Taiwanese, and South Korean vessels, operate under licenses to fish in Seychelles' EEZ, with Port Victoria serving as a key hub for tuna fisheries in the Indian Ocean.

**Small-scale (artisanal) fishery:** The artisanal fisheries sub-sector in Seychelles is reserved for Seychellois, with around 400 licensed vessels producing an annual catch of approximately 4,500 metric tonnes, of which only 10% is exported. This sub-sector plays a crucial role in food security and socio-economic stability, utilizing a variety of boats and fishing methods to target species like snappers, groupers, and trevallies. Seasonal catches of lobsters, octopus, and

spanner crabs also contribute. In 2022, 911 men and 46 women were directly employed in this sector, with a per capita fish consumption of 57 kg.

***Small-scale (semi-industrial longline) fishery:*** The semi-industrial longline fishery in Seychelles, which began in 1995, consists of locally-owned vessels between 14 to 23 meters long, primarily targeting broadbill swordfish, bigeye, and yellowfin tuna, with marlin and sharks as bycatch. In 2022, 53 vessels with a total capacity of 1,600 gross tonnage were licensed to conduct small-scale long-line fishing.

Marine fisheries are a critical part of Seychelles' social, economic, and cultural fabric, playing a central role in the country's developmental agenda. This importance is reflected in national policies and strategies, including the SFA's strategic plan for 2018-2020, which emphasized transparency, stakeholder participation, and public awareness in fisheries management. Similarly, the 2019 Seychelles Fisheries Sector Policy and Strategy focused on promoting visibility, transparency, and inclusivity in decision-making. Transparency is also a core principle in the "Blue Economy: Strategic Policy Framework and Roadmap" (2018-2030), which guides the country's transition towards a sustainable ocean economy.

Building on these principles, the Seychelles government approved a Harvest Strategy Policy 2023 and management standards for the fisheries sector. This policy, endorsed by the Cabinet, mandates the inclusion of harvest strategies in all future fisheries management plans. The policy aims to manage individual fisheries based on their unique biological characteristics and socio-economic goals, ensuring sustainable fish stocks.

The adoption of these policies and strategies demonstrates Seychelles' commitment to sustainable fisheries management, aligning with international standards and the country's broader goals of maintaining a resilient and productive marine ecosystem.

***Seychelles has been collaborating with the FiTI since 2015.*** During its conceptual phase (i.e. July 2015 – April 2017) a representative of the Seychelles government served as a member in the initial International Advisory Council. The country's official commitment to the FiTI was announced at the 1<sup>st</sup> International Conference of the FiTI in Nouakchott/Mauritania, on 3 February 2016. This commitment was documented in the 'Nouakchott Declaration on the Fisheries Transparency Initiative'.<sup>17</sup>

The Seychelles' Cabinet officially endorsed the FiTI following a presentation made by Professor Peter Eigen, founder and former Chair of the FiTI on 7 April 2017.<sup>18</sup> Afterwards, various initial sign-up requirements were completed, such as nominating the Department of the Blue

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<sup>17</sup> [https://fiti.global/wp-content/uploads/2016/02/FiTI\\_1stIntConfDeclaration-EN\\_20160212.pdf](https://fiti.global/wp-content/uploads/2016/02/FiTI_1stIntConfDeclaration-EN_20160212.pdf)

<sup>18</sup> <https://www.statehouse.gov.sc/news/3401/cabinet-business-friday-7th-april-2017>

Economy as the **FiTI Lead Ministry**<sup>19</sup>, and within this ministry, naming Mr. Philippe Michaud as the country's FiTI National Lead.

These activities also included the establishment of the **Seychelles' FiTI National Multi-Stakeholder Group (MSG)**. Together, this group is responsible for how the FiTI is implemented in Seychelles. The first meeting of the National MSG was held on 22 October 2018 and as of today, the group has met 16 times.

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

In April 2020, the International Board of the Fisheries Transparency Initiative (FiTI) announced its approval of the country's application, making the Seychelles only the second country to be granted the status of a FiTI Candidate country, after Mauritania.<sup>20</sup>

Since then, Seychelles' National MSG has published already four annual FiTI Reports:

- ➔ For calendar year 2019: April 2021 [first country in the world to publish such a report]
- ➔ For calendar year 2020: December 2021
- ➔ For calendar year 2021: February 2023
- ➔ For calendar year 2022: April 2024
- ➔ For calendar year 2023: In progress (due by 31<sup>st</sup> December 2024)

In February 2023, the FiTI International Board concluded its first validation on Seychelles' compliance with the FiTI Standard and recognised Seychelles' efforts with a score of "meaningful progress". The validation covered the period from April 2020 to December 2021. Since then, Seychelles remained a FiTI Candidate Country until the overall assessment of compliance concludes the ongoing second validation process.

In July 2023, SFA launched the FIMS, an online tool that provides an integrated platform for the collection, analysis, and dissemination of fisheries data, aiming to improve the accessibility and understandability of fisheries management information.

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<sup>19</sup> Initially, the Department of the Blue Economy was located in the office of the Vice-President of the Republic. After a government change in 2020, the Department has been moved to the Ministry of Fisheries and Blue Economy.

<sup>20</sup> <https://fiti.global/seychelles-is-granted-fiti-candidate-country-status>

At present, the Seychelles’ National MSG consists of 12 members, equally representing government, business, and civil society, as shown below:<sup>21</sup>

Government representatives	Business representatives	Civil society representatives
Department of Fisheries ( <i>Mr Roy Clarisse</i> )	Glacis Fishermen Association ( <i>Mr Faizal Suleman</i> ) <sup>(X)</sup>	Transparency Initiative Seychelles ( <i>Mr Cyril Bonnelame</i> )
United Seychelles ( <i>Hon. Wallace Cosgrow</i> )	Bel Ombre Fishermen Association ( <i>Mr Rodney Nicole</i> ) <sup>(X)</sup>	Green Islands Foundation ( <i>Mrs Wilna Accouche</i> ) <sup>(X)</sup>
Department of Blue Economy ( <i>Mr Philippe Michaud</i> ) <sup>22</sup>	Seaward Shipping ( <i>Mr Selwyn Edmond</i> )	Nature Seychelles ( <i>Mr Antoine Moustache</i> ) <sup>(X)</sup>
Linyon Demokratik Seselwa ( <i>Hon. Philip Monthy</i> )	Association of Fish Processors and Exporters of Seychelles ( <i>Mr Muditha Gunathilake</i> ) <sup>(X)</sup>	Sustainability for Seychelles ( <i>Dr Marie-Thérèse Purvis</i> )

Members marked with an (X) have joined the National MSG during this second validation timeframe. Furthermore, the SFA and a youth representative are permanent observers of the National MSG.

Seychelles’ government also continues to link its commitment to implementing the FiTI with its wider open government efforts by including the FiTI in its first and second Open Government National Action Plans (2019-2021 and 2023-2025) under Commitment 1, 'Transparency'.<sup>23</sup>

<sup>21</sup> <http://www.mofbe.gov.sc/fiti/national-multi-stakeholder-group/>

<sup>22</sup> FiTI National Lead and Chair of the National Multi-Stakeholder Group

<sup>23</sup> <https://www.opengovpartnership.org/documents/seychelles-action-plan-2019-2021/>  
[https://www.opengovpartnership.org/wp-content/uploads/2024/02/Seychelles\\_Action-Plan\\_2023-2025\\_December.pdf](https://www.opengovpartnership.org/wp-content/uploads/2024/02/Seychelles_Action-Plan_2023-2025_December.pdf)

### 3) Assessment of individual ‘transparency requirements’

The assessment of Seychelles’ compliance with the transparency requirements of the FiTI Standard consists of **twelve validation elements**, in accordance with section B.1 of the FiTI Standard. This assessment covers both of Seychelles’ FiTI Reports that fall within the validation timeframe (calendar year 2021 and 2022).

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

According to Section D of the FiTI Standard, for subsequent regular validations, the level of **progressive improvement** in making previously unavailable or unpublished information publicly accessible has been included in the determination of the level of compliance. The evaluation also comprises the **direction of progress** in terms of meeting each FiTI requirement in comparison to Seychelles most recent first validation.

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

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

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



**Detailed remarks:**

- ⇒ **[B.1.1\_1]** The major legislations and policies governing Seychelles' fisheries, are accessible on the SFA and MoFBE. These include the Fisheries Act (2014), Fisheries Regulations (1987), Fisheries Sector Policy and Strategy (2019), Fisheries Comprehensive Plan (2019), and two new 2021 legislations: Fisheries (Mahe Plateau Trap and Line Fishery) Regulations and Fisheries (Aquaculture) Regulations (2020). No further legislation or policies were enacted in 2022 and 2023.<sup>24</sup> The publicly available list includes previously unpublished laws, regulations and policy documents (in PDF format).<sup>25</sup> In July 2024, the Seychelles Fisheries Authority Act (2024)<sup>26</sup> – which provides for an authority to oversee the efficient management and sustainable development of the fisheries sector on a par with international norms, standards and best practices, and replaces the Seychelles Fishing Authority (Establishment) Act – was enacted.

The Seychelles 2020 FiTI Report published access data for copies of laws and regulations via the Office of the Attorney General's website and the Official Gazette. To date (July 2024), this access remained unchanged. The online version of the Official Gazette includes only information from 2019 onward.

- ⇒ **[B.1.1\_2]** There is no documentation on whether the National MSG decided on which areas of fisheries this transparency requirement applies to. However, the most relevant regulations and policies of Seychelles' marine fisheries sector are covered, including fisheries-related legislations, fisheries-related policies, fisheries plans and strategies, as well as other documents (e.g. fisheries aquaculture regulation). The list also includes PDF copies of the main sector-relevant international treaties, policy instruments and best practices to which Seychelles is signatory or adhering.

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<sup>24</sup> <http://www.mofbe.gov.sc/fisheries-legislations-and-regulations/>  
<http://www.mofbe.gov.sc/fisheries-and-related-policies/>  
<https://mofbe.gov.sc/plans-strategies-reports-agreements/>

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

<sup>25</sup> The 2019 National MSG recommended publishing national and international fisheries laws, regulations, and policy documents online (FiTI Report ID: 2019-1\_1, High Priority, Due: December 2021). This has been fully implemented, with all relevant documents now available, up-to-date on the MoFBE website.

<sup>26</sup> [Act 7 - 2024 - Seychelles Fisheries Authority Act 2024 \(gazette.sc\)](#)

**Direction of progress:**

Compared to the first validation timeframe, there has been no change in the implementation of this requirement, meaning that Seychelles maintained its high level of transparency for national fisheries laws, regulations and official policy documents.

**Fisheries Tenure Arrangements**

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

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

**Detailed remarks:**

**[B.1.2\_1]** The SFA provides a webpage, including a downloadable FAQ document detailing fisheries tenure arrangements, as outlined in the previous Seychelles 2020 FiTI Report. This summarises the types of fisheries in Seychelles and their associated licensing arrangements, including fees, duration, transferability, and divisibility.

The information has been updated for 2022. Additionally, the SFA has published summary descriptions related to the country’s four main fisheries (i.e. commercial, recreational, sport and scientific) on its website<sup>27</sup>.

The rules and procedures for Seychelles-flagged vessels to obtain fishing authorizations in third countries or the High Seas, including general reporting and termination

<sup>27</sup> <https://www.sfa.sc/faqs>  
<https://www.sfa.sc/fisheries-report-other-document?task=download.send&id=238&catid=33&m=0>

provisions, have been fully implemented as per recommendation [ID:2019-2\_4]. For a better understanding of these new requirements, a sample agreement with its annex, detailing the new provisions, is available on the SFA website.

Additionally, the National MSG identified a need to enhance transparency in fisheries tenure arrangements by publishing fees for all types of fisheries rights and any changes to fee structures in the Official Gazette<sup>28</sup>. This recommendation [ID: 2019-2\_2] was due by December 2021 is now fully implemented and reflected in the 2022 FiTI Report.

During the 2019 FiTI reporting process, the National MSG identified opacity in the procedures for participating in Seychelles' sea cucumber fishery, especially compared to the more transparent spiny lobster fishery. Clarifications for the absence of processes and procedures to join the sea cucumber fishery are now published as part of the FAQ on fisheries tenure arrangements on the SFA website. SFA has also published detailed information regarding licenses for the sea cucumber fishery online on its website.<sup>29</sup>

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

### **Direction of progress:**

Compared to the first validation timeframe, the level of transparency for tenure arrangement has gotten worse. While all the relevant information remains online, the previous information published on the SFA website ('FAQ') is becoming outdated, while at the same time, the SFA FIMS also includes a summary of tenure arrangements for Seychelles fisheries. This is

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<sup>28</sup> This fulfils recommendation 2019-2\_2, which calls for the MoFBE to publish all fisheries rights fees in the Official Gazette, since the current law does not require this.

<sup>29</sup> <https://www.sfa.sc/index.php/services1/fishing-licence/small-scale-fisheries-licences/summary/54-small-scale-fisheries-licences/152-small-scale-fisheries-licences-2020>

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

potentially confusing to stakeholders, as it is not clear which is the most updated and accurate version.

### Foreign Fishing Access Agreements

The objective of this requirement is to ensure public access to all contractual arrangements that Seychelles has entered into with any foreign party. Transparency around access agreements provides the basis for public awareness of the rights enjoyed and responsibilities assumed by foreign fishing vessels operating in Seychelles' marine jurisdictional waters, as well as Seychelles-flagged fishing vessels operating in the waters of third countries.<sup>30</sup>

ID	Validation indicator	Scoring
<b>B.1.3_1</b>	The implementing country must publish the contracts of all foreign fishing access agreements, including their associated protocol(s). <sup>31</sup>	<b>Compliant [3]</b>
<b>B.1.3_2</b>	The implementing country must publish studies or reports undertaken by national authorities or foreign parties to an agreement providing evaluation or oversight of the agreement, if available.	<b>Compliant [3]</b>
<b>B.1.3_3</b>	The implementing country must publish documentation derived from any national stakeholder consultation undertaken with respect to the preparation, negotiation or monitoring of the agreements, if available.	<b>Inadequate progress [1]</b>
		<b>Meaningful progress [Avg. 2.3]</b>

#### Detailed remarks:

- ➔ **[B.1.3\_1]** In total, seven fishing agreements (five agreements that allow foreign vessels to fish in Seychelles waters and two agreements that allow Seychelles-flagged vessels to fish in third country waters) are published on the SFA website.<sup>32</sup> The National MSG

<sup>30</sup> These agreements provide compensation to the coastal state for fishing opportunities in its waters, such as monetary transfers, commitments for investments and services, or reciprocal access to overseas fishing grounds for the coastal state's national fishing fleet.

<sup>31</sup> This includes agreements that allow access for foreign vessels to fish in the country's marine jurisdictional waters (i.e. Territorial Sea and Exclusive Economic Zone) as well as agreements that allow nationally-flagged vessels to fish in a third country.

<sup>32</sup> <https://www.sfa.sc/index.php/e-library/fisheries-legislation-other-fisheries-related-documents>

viewed this information as complete in the 2022 FiTI Report, suggesting that all foreign fishing agreements have been published.

Although these agreements are public, no summary overview is available online on a government website to make the total number, names, and contractual parameters of these agreements better understandable to the public.

Within this validation timeframe, Seychelles has made significant progress in transparency with its fishing access agreements. The agreements with the Taiwan Deep-sea Tuna Longline Boat Owners and Exporters Association (TTA) and Top Fortune International (TFI), which allow foreign vessels to fish in Seychelles' waters, were renegotiated in 2022 and took effect in 2023. These agreements, previously subject to confidentiality clauses and therefore inaccessible to the public, have now been published on the SFA website.

Furthermore, Seychelles made significant progress in the formalisation of the foreign fishing access agreement with Dongwon Industries Co. Ltd (South Korea). As identified in the 2019 FiTI Report, there has been no written formal agreement between both parties. However, the government of Seychelles has now negotiated an agreement (during 2023) which took effect in 2024. The agreement is now also publicly accessible on the SFA website.

- ➔ **[B.1.3\_2]** The three evaluation reports on the EU/Seychelles Sustainable Fisheries Partnership Agreement published in 2020 were still accessible in July 2024, with no new reports released since. In 2022, MoFBE commissioned an evaluation of both the Mauritius/Seychelles and EU/Seychelles fishing agreements, focusing on compliance with the agreements' conditions, the results have yet to be published.

*[Best available information]* The 2022 Detailed FiTI Report also clearly states that the National MSG found no instances where information provided by national authorities in assessments of the impact of these access agreements is misleading. Likewise, the National MSG found no instances where the accuracy of information in these assessments could be improved by considering alternative sources, such as studies by non-governmental organisations, the private sector or academic institutions.

- ➔ **[B.1.3\_3]** Since 2021, all fisheries agreements have been renegotiated without any recorded public stakeholder consultations. In 2022, this remained the case as the government of Seychelles did not collate or publish any documentation from national stakeholder consultations related to the preparation, negotiation, or monitoring of

foreign agreements. During that year, Seychelles negotiated new agreements with Mauritius, Taiwan Deep-sea Tuna Longline Boat Owners and Exporters Association (TTA) and Top Fortune International (TFI), and the discussions primarily took place within the government, involving various ministries and agencies.

The National MSG previously recommended in the 2019 FiTI Report (ID: 2019-3\_4) that the MoFBE publish information from past and recent stakeholder consultations on foreign fishing access agreements. This recommendation has since been superseded by recommendation [ID: 2022-3\_1; Priority: High; Due date: December 2027].<sup>33</sup> This should be monitored during future validations.

**Direction of progress:**

Compared to the first validation timeframe, the current publicly available information indicates notable progress towards better levels of transparency. In particular the removal of confidentiality clauses from such agreements and their subsequent publication on government websites reflect a positive trend. However, the lack of public consultation highlights a significant area for improvement.

**The State of the Fisheries Resources**

The objective of this requirement is to enhance public access to information regarding the health of Seychelles’ marine fisheries resources. This is particularly important for fish targeted by commercial fisheries, given that their overfishing can put unsustainable pressure on stocks whose abundance is essential for ensuring national development and food security.

ID	Validation indicator	Scoring
<b>B.1.4_1</b>	The implementing country must publish the most recent national reports on the state of fish stocks, including any information on trends in the state of stocks and conclusions on the reasons for change, as well as studies or reports undertaken by national authorities that assess the sustainability of fishing.	<b><i>Compliant [3]</i></b>
<b>B.1.4_2</b>	The implementing country must provide information on the methods and data used to assess fish stocks.	<b><i>Compliant [3]</i></b>

<sup>33</sup> The MoFBE must include public consultation as part of the process to prepare, negotiate and monitor foreign fishing access agreements and publish the outcome of these.

ID	Validation indicator	Scoring
B.1.4_3	The implementing country must publish on ongoing or planned efforts to update and expand fish stock assessments.	<b>Compliant [3]</b>
		<b><u>Compliant</u></b> <b>[Avg. 3.0]</b>

**Detailed remarks:**

- ➔ **[B.1.4\_1]** All stock assessment reports by the SFA have been published online, dating back to 2017, alongside a stock status summary. The summary, first released in 2020 and updated with 2020 and 2021 data, includes the status of fish species assessed from 2018 and provides links to the detailed reports. Although the government of Seychelles did not provide a comprehensive national report on fish stocks, there are now published reports for existing stock assessments of species under its management, such as demersal and semi-pelagic species, lobster, and sea cucumber.

The SFA has a dedicated section on MCS activities in its Annual Report, signalling an improvement in transparency and the management of fish stocks.

It is highlighted that the National MSG continues to acknowledge the importance of information on stock status and therefore includes a summary table of the latest available information in both FITI Reports, using easy-to-understand colour-coding to indicate the health of fish stocks.

*[Best available information]* The 2022 FITI Report states clearly that the National MSG found no instances relating to the state of fisheries resources where information published by national authorities is clearly misleading. Likewise, the National MSG found no instances where published information could be improved by considering alternative sources, such as studies by non-governmental organisations, the private sector, or academic institutions.

- ➔ **[B.1.4\_2]** Details of the methods used to undertake the stock assessments are available as part of either the detailed reports published online by Seychelles' national authorities or the IOTC.

- ➔ **[B.1.4\_3]** The SFA has published its work programme for future stock assessments up to the year 2024 on their website. The work programme also provides a link to the IOTC schedule of future stock assessments up to 2024.

### **Direction of progress:**

Compared to the first validation timeframe, some notable progress can be determined, e.g. the continued update of stock assessment reports and inclusion of this data in FiTI Reports and the SFA’s Annual Reports. Moreover, the SFA is improving communication of fisheries data, particularly regarding lobster, with the publication of the Lobster Flyer 2022<sup>34</sup>. This effort marks a step toward fulfilling recommendation [2022-4\_1], which calls for the development of a communication strategy that addresses the specific needs of various stakeholders, recognizing that not all can access information electronically.

However, it should be noted that SFA has still not produced a comprehensive national report on the overall status of fish stocks in Seychelles. The failure to compile this report has been attributed by SFA to high staff turnover. Furthermore, summary information on the health of Seychelles’ fisheries resources, as provided in the FiTI Report, is still not available online (only in those reports).

### **Large-Scale Fisheries**

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

ID	Validation indicator	Scoring
<b>B.1.5_1</b>	The implementing country must provide an online, up-to-date registry of all nationally-flagged and foreign-flagged large-scale vessels authorised to fish in the country’s marine jurisdictional waters, and of all nationally-flagged large-scale vessels authorised to fish in third countries’ marine jurisdictional waters and on the High Seas, including information on 14 attributes, as listed in section B.1.5 of the FiTI Standard.	<b><i>Compliant [3]</i></b>

<sup>34</sup> <https://www.sfa.sc/e-library/fisheries-report/summary/15-research-newsletter/184-lobster-flyer-2022>



ID	Validation indicator	Scoring
<b>B.1.5_2</b>	The implementing country must publish accessible and complete information on payments made by each vessel listed in the vessel registry for their fishing activities, including information on 4 attributes, as listed in section B.1.5 of the FiTI Standard. <sup>35</sup>	<b>Compliant [3]</b>
<b>B.1.5_3</b>	The implementing country must publish information on the quantity of annual recorded retained catches by nationally-flagged vessels listed in the vessel registry, including according to species or species groups, disaggregated by fishing authorisations or gear type as well as marine jurisdictional waters, High Seas and third country waters, presented for the flag state.	<b>Compliant [3]</b>
<b>B.1.5_4</b>	The implementing country must publish information on the quantity of annual recorded retained catches by foreign-flagged vessels listed in the vessel registry according to species or species groups, disaggregated by fishing authorisations or gear type, presented for each flag state separately.	<b>Compliant [3]</b>
<b>B.1.5_5</b>	The implementing country must publish information on the quantity of annual recorded landings in national ports according to species or species groups caught in the country's marine jurisdictional waters, disaggregated by fishing authorisations or gear types, presented for each flag state separately.	<b>Meaningful progress [2]</b>
<b>B.1.5_6</b>	The implementing country must publish information on the quantity of annual recorded transshipments at sea or landings in foreign ports according to species or species groups caught in the country's marine jurisdictional waters, disaggregated by fishing authorisations or gear types, presented for each flag state separately.	<b>Meaningful progress [2]</b>
<b>B.1.5_7</b>	The implementing country must publish information on recorded quantities of discards according to species or species groups, disaggregated by fishing authorisations or gear types, presented for each flag state separately, if available. <sup>36</sup>	<b>Meaningful progress [2]</b>

<sup>35</sup> Information on payments to port authorities must be separated from payments for fishing activities.

<sup>36</sup> This must include information on how information on discards is gathered by national authorities.

ID	Validation indicator	Scoring
<a href="#">B.1.5_8</a>	The implementing country must publish the most recent studies and reports on recorded fishing effort by vessels, disaggregated by fishery or gear type and by flag state, if available.	<b>Meaningful progress [2]</b>
<a href="#">B.1.5_9</a>	The implementing country must publish evaluations or audits of the economic, social and food security contribution of the large-scale fishing sector, if available.	<b>Not collated</b>
		<b>Compliant</b> [Avg. 2.5]

### Detailed remarks:

There is no definition of large-scale commercial fishery in Seychelles' laws and regulations. However, commercial small-scale fisheries is defined in the Fisheries Comprehensive Plan. Therefore, the National MSG determined that the large-scale commercial fishery in Seychelles can be defined as any commercial fishery which is excluded from the definition of small-scale fisheries.

➔ [\[B.1.5\\_1\]](#) In 2022, the National Multi-Stakeholder Group (MSG) reported on various sources of information regarding industrial (large-scale) fishing vessels operating in Seychelles waters. The primary sources included the 2022 industrial vessel registry, the Fisheries Statistical Report, the SFA Annual Report, and the newly implemented Fisheries Information Management System (FIMS). The FIMS platform, launched in July 2023, aims to improve data accessibility, availability, and timeliness, partially fulfilling the recommendation [2020\_5\_5] for an online data system that meets all FiTI requirements.

Legal ownership information, including addresses and nationalities, was thoroughly documented, fulfilling previous recommendations and ensuring transparency. Data on the physical characteristics of vessels, such as length, width, gross tonnage, engine type, and power, were complete for all vessels. As all foreign licensed vessels are represented by local agents, as required for foreign-owned vessels, the name of the agent was also included. The vessels were authorized to target tuna and tuna-like species, with quotas adjusted to account for previous over-catches.

➔ [\[B.1.5\\_2\]](#) The progression in reporting and transparency of license payments by large-scale fishing vessels in Seychelles from 2019 to 2022 reflects significant advancements. Initially, data for 2019 was only available internally at the SFA. By 2020, SFA began

publishing license payment information online, linking it to the large-scale vessel registry in response to National MSG recommendations. This practice continued in 2021 and 2022, with complete data available for all vessels, though the actual foreign payee was often not captured, with local agents listed instead.

Despite challenges in accessing physical records for 2022, ongoing efforts to improve the publication on payments made by vessels include SPA's digitisation plans through the Port Victoria Management Information System, aiming to provide more detailed and accessible payment information on transshipment and landing fees by 2024.

- ➔ **[B.1.5\_3]** The reporting on retained catches from Seychelles-flagged large-scale fishing vessels shows significant progress in data completeness and transparency. Initially, data issues were noted, especially for the industrial longline fishery, where unreturned logbooks led to incomplete records, as highlighted in the 2020 FiTI Report. Despite these challenges, the SFA updated catch data for 2019 in September 2021, and subsequent reports for 2021 and 2022 show marked improvements, achieving 100% logbook return.

The 2021 report was the first since the inaugural Seychelles FiTI Report to have complete data, and 2022 maintained this level.

- ➔ **[B.1.5\_4]** The 2021 and 2022 SFA Fisheries Statistical Reports, both available online and containing information on retained catches from foreign flagged large-scale vessels fishing in Seychelles' waters, indicate that data for the purse seine fishery is complete and meets the FiTI Standard by disaggregating catches by species, flag State, and geographical area.

For the industrial longline fishery, the reports emphasize complete data collection due to a 100% logbook return in both years, marking an improvement over previous years, where data completeness was hindered by unreturned logbooks.

- ➔ **[B.1.5\_5]** The data on annual recorded landings and transshipments in national ports are available online, published in the Fisheries Statistical Reports. The published landing data for both 2021 and 2022 is considered complete; however, challenges persist in fully complying with the FiTI Standard. The main issue lies in the inability to disaggregate the data to distinctly identify catches made in Seychelles' waters from those made in other jurisdictions or the High Seas. This challenge is attributed to the practical difficulty of separating catches stored in shared wells. Despite these challenges, the data set is disaggregated by other attributes such as month, flag State, fish species, fish size, landing destination, and fishing agreement.

For the industrial longline fishery, no data on landings and transshipments have been published due to ongoing technical software issues. This data, although captured on landing and transshipment forms and submitted to the Monitoring, Control, and Surveillance (MCS) Division of the SFA for verification, remains uncollated for publication.

A significant development noted in the 2022 FiTI Report is the SFA's commitment to start collating and publishing transshipment and landing data for the industrial longline fishery in 2024. This marks a potential improvement in data transparency and compliance with FiTI standards moving forward.

- ➔ **[B.1.5\_6]** The data on annual recorded landings and transshipments in foreign ports are partially available online, published in the 2022 Fisheries Statistical Reports.

Published data on landings and transshipments in foreign ports by the purse seiner fishery is not disaggregated by flag State, even though this information is collated by SFA, as landings and transshipments in foreign ports are minimal compared to national ports.

Data for the industrial longline fishery has not been published by Seychelles' authorities at all, even though most data is being collated by SFA. SFA claims that their level of confidence in the data is low as they do not have a system in place to assess the accuracy of the data. The lack of information and its underlying reasons are clearly stated in previous FiTI reports.

However, the SFA has recently introduced new statistical software, which is anticipated to significantly enhance data collection, validation, and publication capabilities by 2024. These efforts reflect Seychelles' commitment to improving the transparency and accuracy of its fisheries data, aiming to better inform stakeholders and support sustainable fisheries management by addressing existing challenges and upgrading future reporting mechanisms.

- ➔ **[B.1.5\_7]** The data on annual recorded discards are available online, published in the 2022 Fisheries Statistical Reports. In 2021 and 2022, the Seychelles made significant strides in reporting fish discard data for its fisheries. Both reports now include data for both the purse seine and longline fisheries, marking a significant expansion from previous years when only purse seine data was available. Moreover, while previously discard figures used to include bycatch, there is now a clear distinction between bycatch and discard data.

While the purse seine data remains undifferentiated by species due to format limitations, the longline fishery data provides species-specific information.

Additionally, the Seychelles has improved its reporting of non-fish discards to the Indian Ocean Tuna Commission (IOTC), detailing whether discarded animals are alive or dead. Efforts to verify discard data accuracy continue, with Electronic Monitoring piloted on industrial longliners since 2019. Despite these advancements, challenges remain, particularly in aligning fully with FiTI Standard requirements for data disaggregation by species and flag State.

- ➔ **[B.1.5\_8]** The data on fishing effort by large-scale vessels was published online, through the Fisheries Statistical Reports. For both, the purse seine and industrial longline fisheries, SFA collects and archives data on fishing effort by individual vessel. However, the data is published by flag State. Data on fishing effort for the large-scale fisheries is assessed by the national MSG as complete, based on 100% logbook return for both the industrial purse seiners and longliners.
  
- ➔ **[B.1.5\_9]** In 2022, Seychelles' large-scale fishing sector's economic contribution was partially documented, with the industrial fisheries generating SCR 2.95 billion, representing 9% of the country's current account receipts and serving as a major source of foreign currency. However, comprehensive evaluations of the sector's economic, social, and food security contributions remain limited. The National Bureau of Statistics provided GDP-related data through quarterly bulletins, yet the National MSG has expressed concerns about the under-reporting of the sector's economic impact, hindering informed decision-making. The collaboration between the MoFBE and the NBS on fisheries satellite accounts has been delayed, with no completion date in sight, underscoring the need for improved understanding of the sector's role in the local economy. Additionally, the social and food security contributions of the large-scale fishing sector continue to receive insufficient attention, as highlighted by the lack of comprehensive evaluations and official government publications.

**Direction of progress:**

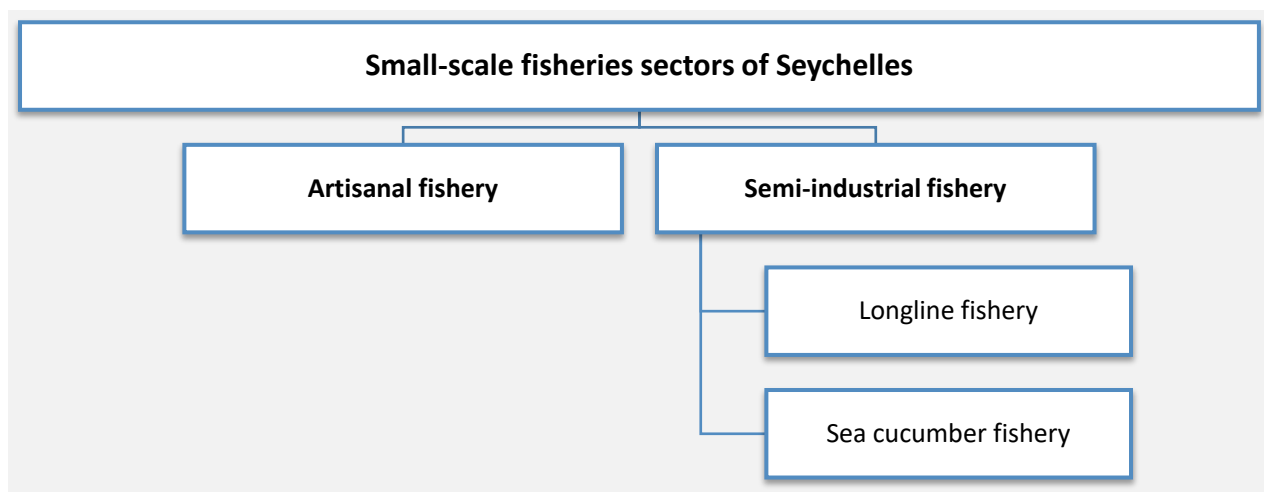
Compared to the first validation timeframe, there is no change in the direction of progress for information relating to large-scale fisheries. Although the reporting on industrial fishing vessels, license payments, and retained catches has improved, with data completeness and accessibility being key focus, challenges remain in fully disaggregating data by catch location, and the economic and social impacts of the sector are still under-evaluated. Moreover,

according to the 2022 FiTI report, payment data could not be verified due to fungus infestation affecting the physical documents. This has resulted in challenges to identify correct figures for payments made as those reported in the Seychelles FIMS differ from the figures in the 2022 FiTI report.

However, as noted efforts to enhance data accuracy through digitization and new software are underway, with further progress expected from 2024 onwards.

### Small-Scale Fisheries

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



ID	Validation indicator	Scoring
<b>B.1.6_1</b>	The implementing country must publish information on the total numbers of small-scale fishing vessels, disaggregated according to categories of fishing or gear types.	<b>Compliant [3]</b>
<b>B.1.6_2</b>	The implementing country must publish information on the total number of fishing licenses issued to small-scale fishing vessels, disaggregated according to categories of fishing authorisations.	<b>Compliant [3]</b>
<b>B.1.6_3</b>	The implementing country must publish information on the total numbers of fishers engaged in the fishing sector, indicating the gender of fishers and the proportion that are	<b>Meaningful progress [2]</b>

ID	Validation indicator	Scoring
	engaged in full-time work, seasonal or part time fishing, occasional fishing or recreational fishing.	
<b>B.1.6_4</b>	The implementing country must publish information on the total payments made from small-scale fisheries related to fishing authorisations, catches and landings, disaggregated according to categories of fishing authorisations or gear types and indicating the recipient of these payments.	<b>Compliant [3]</b>
<b>B.1.6_5</b>	The implementing country must publish information on the quantity of catches, disaggregated according to species, categories of fishing authorisations and gear types.	<b>Inadequate progress [1]</b>
<b>B.1.6_6</b>	The implementing country must publish information on the total volumes of discards, disaggregated according to species, categories of fishing authorisations and gear types.	<b>Not applicable</b>
<b>B.1.6_7</b>	The implementing country must publish evaluations or audits of the economic, social and food security contribution of the small-scale fisheries sector, if available.	<b>Meaningful progress [2]</b>
		<b>Meaningful progress [Avg. 2.3]</b>

### **Detailed remarks:**

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

- ➔ **[B.1.6\_1]** Information on small-scale vessels is available to the Seychelles' government and published online on an annual basis in its Fisheries Statistical Report, most recently for 2022.<sup>37</sup> This includes the total number of active vessels, as well as breakdowns according to sub-sectors and vessel type. A breakdown according to gear types is not provided, as many boats in the small-scale fisheries are multi-geared.

In 2020, during the last validation timeframe, the SFA advanced transparency by introducing a downloadable spreadsheet, listing all registered small-scale fishing vessels

<sup>37</sup> <https://www.sfa.sc/e-library/fisheries-report/summary/6-sfa-fisheries-bulletin/224-fisheries-statistical-report-year-2022>

and corresponding licenses, though issues with data completeness, especially for artisanal fisheries, were identified.<sup>38</sup>

The 2022 Fisheries Statistical Report continued to offer vessel data but highlighted significant gaps, with no catch data available for the artisanal fishery due to ongoing challenges in upgrading data processing systems. The Fisheries Statistical Report for 2023 has not yet been published at the time of this report (July 2024); SFA has indicated that the publication has been scheduled for September 2024.

- ➔ **[B.1.6\_2]** Prior to the current FiTI reporting period, information on small-scale fishing licenses was not published online, except for the restricted-access lobster fishery. The Fisheries Act did not require the publication of issued licenses. However, as part of the 2020 FiTI reporting process, the SFA began publishing downloadable Excel documents listing all small-scale fishing vessels and their licenses on its website. This step fulfilled the National MSG's recommendation 2019\_6\_1.

In the updated reporting period (2021 & 2022), the SFA continued this practice. The published data is categorized by artisanal fishery, net fishery, lobster fishery, small-scale longline fishery, sea cucumber fishery, and semi-industrial sea cucumber fishery. Exclusions remain for sport fishery and non-commercial recreational vessels, with no new registration requirements for the latter. Additionally, a moratorium<sup>39</sup> on the importation and chartering of longline fishing vessels for the small-scale tuna fishery was announced for August 2023 to June 2024.

- ➔ **[B.1.6\_3]** Prior to 2020 and during Seychelles first validation timeframe, information on small-scale fishers in Seychelles was collected but not published online. Since 2022 this information has now been published on the SFA website and includes data since 2019.<sup>40</sup> This shows positive progress and includes data on the total number of licensed fishers, with a breakdown by gender and type of fisher fulfilling recommendation 2021\_6\_1. However, the 2022 FiTI Detailed Report noted that data on occasional or part-time fishers was not collected, and the SFA only tracks registered fishers without capturing their full-time, part-time, or occasional status.

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<sup>38</sup> <https://www.sfa.sc/index.php/services1/fishing-licence/small-scale-fisheries-licences/summary/54-small-scale-fisheries-licences/152-small-scale-fisheries-licences-2020>

<sup>39</sup> <https://www.nation.sc/articles/18907/cabinet-approves-moratorium-on-importation-and-chartering-of-longline-fishing-vessels>

<sup>40</sup> <https://www.sfa.sc/index.php/services1/fishing-licence/small-scale-fisheries-licences?task=download.send&id=151&catid=54&m=0>



Additional information on employment status was provided through the Employment Study and Capacity Needs Assessment <sup>41</sup> detailed in the 2021 FiTI Report, which offers a clearer picture of full-time and part-time fishers.

- ➔ **[B.1.6\_4]** Prior to 2020, payment information from small-scale fisheries was collected by the government but not published online. As part of the 2020 FiTI reporting process, the SFA made detailed payment data available to the National MSG, exceeding FiTI Standard requirements. This included per-vessel information on payments for vessel licenses and fishing activity fees.

In a notable transparency effort, SFA began publishing payment information on its website. Previously, such details were only included in FiTI Reports. However, the National MSG identified discrepancies, noting that three artisanal fisheries licenses issued in 2021 were not linked to recorded payments, indicating potential gaps in the published data. No discrepancies were noted by the national MSG for payments made in 2022.

- ➔ **[B.1.6\_5]** The Seychelles government has been working to enhance transparency and completeness in its fisheries data reporting. The previous 2019 Fisheries Statistical Report included catch data breakdowns by species (excluding demersal fisheries), fishing authorizations, and gear types. However, it did not cover sea cucumber and lobster fisheries, and the National MSG highlighted these gaps, noting the incomplete nature of artisanal fishery data. In 2021, the SFA Annual Report and Fisheries Statistical Report introduced catch data for sea cucumber and lobster fisheries, addressing recommendation [ID:2020-6\_2].

However, the 2021 data for the artisanal fishery was incomplete, covering only the first semester due to data processing system upgrades. The data was disaggregated by species groups, vessel type, month, and gear type. The *small-scale longline fishery* data was complete, based on full logbook returns. However, the 2022 Reports continued to address data gaps, restating 2021 artisanal fishery data due to unavailable 2022 data and maintained similar disaggregation practices.

Sea cucumber and lobster fisheries data were reported for the second consecutive year. Notably, the lobster fishing season data were presented in user-friendly summaries available online.<sup>42</sup> Sea cucumber harvests also continued to decrease, with detailed

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<sup>41</sup> <https://www.sfa.sc/index.php/e-library/fisheries-report?task=download.send&id=172&catid=51&m=0>

<sup>42</sup> <https://www.sfa.sc/index.php/e-library/fisheries-report/summary/8-sfa-technical-report/181-report-on-the-spiny-lobster-fishery-summary-of-fishing-activity-for-the-2021-2022-season>

information on species composition and fishing efforts provided. Overall, while Seychelles has made progress in improving data transparency and accessibility, challenges remain in achieving complete, timely and detailed reporting, particularly for the artisanal fishery.

The assessment status provided for this indicator remains unchanged, given that there was no catch data published for artisanal fishery in 2022, and the 2023 Fisheries Statistical Report remains outstanding.

- ⇒ [B.1.6\_6] The government of Seychelles does not gather statistics or release studies on the species and volumes of fish discarded in the small-scale sector as according to the 2022 Fisheries Statistical Report, there are no discards in the artisanal fishery because unsold fish are used as bait or kept for personal consumption by the fishers.
  
- ⇒ [B.1.6\_7] The government of Seychelles has made meaningful progress in the publication of evaluations or audits of the economic, social, and food security contributions of the small-scale fisheries sector. The SFA has published three studies on the socio-economic contributions of the small-scale longline fleet, sea cucumber fishery, and sport and recreational fishery on their website<sup>43</sup>, this indicates that the SFA has responded to previous gaps in information, where information was previously not collated. These studies provide comprehensive evaluations of the economic and social impacts of these fisheries.

Recommendation (ID: 2019-6\_2) has been fully implemented, with the publication of these three studies.

### **Direction of progress:**

Compared to the first validation timeframe, there is no change in the direction of progress regarding transparency for small-scale fisheries.

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<sup>43</sup> <https://www.sfa.sc/index.php/e-library/fisheries-report/summary/21-other-reports/171-baseline-socio-economic-study-of-small-scale-longline-fleet>  
<https://www.sfa.sc/index.php/e-library/fisheries-report/summary/21-other-reports/131-economic-impact-of-the-seychelles-sea-cucumber-fishery-and-industry>  
<https://www.sfa.sc/e-library/fisheries-report?task=download.send&id=216&catid=51&m=0>

## Post-Harvest Sector and Fish Trade

The objective of this requirement is to enhance public access to key information in the post-harvest value chain, in particular the scope of Seychelles' reliance on fish-related import and exports. Fish is the most traded agricultural product in the world (in monetary terms), providing an important source of revenues and foreign exchange. The inflow and outflow of fish from a country also has substantial implications on the availability of food, contributing to national food security.

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

ID	Validation indicator	Scoring
<b>B.1.7_1</b>	The implementing country must publish information on the total quantity of fish and fish products produced, disaggregated by species and fish products.	<b><i>Inadequate progress</i></b> <b>[1]</b>
<b>B.1.7_2</b>	The implementing country must publish information on the total quantity of imports of fish and fish products, disaggregated by species and fish products, indicating the country of their origin.	<b><i>Meaningful progress</i></b> <b>[2]</b>
<b>B.1.7_3</b>	The implementing country must publish information on the total quantities of exports of fish and fish products, disaggregated by species and fish products, indicating the country of their destination.	<b><i>Inadequate progress</i></b> <b>[1]</b>
<b>B.1.7_4</b>	The implementing country must publish information on the total number of people employed in commercial fisheries sectors, including the number of men and women working in specific sub-sectors.	<b><i>Meaningful progress</i></b> <b>[2]</b>
<b>B.1.7_5</b>	The implementing country must publish information on the total number of people employed in informal fisheries sectors, including the number of men and women working in specific sub-sectors.	<b><i>Not Collated</i></b>
<b>B.1.7_6</b>	The implementing country must publish reports or studies on wages in the post-harvest sector, if available.	<b><i>Meaningful progress</i></b> <b>[2]</b>
		<b><i>Meaningful progress</i></b> <b>[Avg. 1.6]</b>

**Detailed remarks:**

- ➔ **[B.1.7\_1]** The total quantity of fish and fish products produced in Seychelles is published as part of the Production Indicator in the NBS Statistical Bulletin, with more detailed analyses available in the SFA Annual Reports. However, the data does not fully meet the requirement to disaggregate information by species, as the reports continue to group multiple species under the same product categories.

While sector-specific data are presented for artisanal, semi-industrial, and small-scale industrial fisheries, significant challenges remain in achieving complete data coverage, particularly for artisanal fisheries. The fish catch data is incomplete as fish catch data for 2022 is limited to only small-scale industrial fishery.

- ➔ **[B.1.7\_2]** The total quantity of imports of fish and fish products for 2022 is published as part of the Merchandise Trade Statistical Bulletin of the NBS <sup>44</sup> and the Annual Report. However, the Statistical Bulletin only publishes the total quantity of imports. Other detailed information such as weight, species, or country of origin, which are required by the FiTI Standard, is instead included in the SFA Annual Reports.

- ➔ **[B.1.7\_3]** In 2021, 2022 and 2023, the Seychelles government published export data for fish and fish products through the NBS' Merchandise Trade Statistical Bulletins, disaggregated by Harmonized System Codes into five categories. Although the export destinations are being included in the SFA Annual Reports, there is still a lack of disaggregation at the species level <sup>45</sup>, despite the NBS collecting this information.

- ➔ **[B.1.7\_4]** Initially, no collated data on employment in Seychelles' commercial fisheries was available. In 2021, some progress was made, however, the data remained incomplete. The National MSG could not confirm an accurate total for employment figures, and existing estimates were often considered gross underestimations e.g. the NBS' Employment & Earnings Bulletin. The National MSG recommended to publish annual employment information regarding Seychelles' commercial fisheries sector (ID: 2019-7\_2).<sup>46</sup> SFA's 2019/2020 Annual Report provided an estimation, although this

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<sup>44</sup> <https://www.nbs.gov.sc/downloads/38-economic-statistics/13-merchandise-trade/127-2022>

<sup>45</sup> The National MSG stated that data for species groups could be available from records kept as part of the issuance of phytosanitary certificates (all exports) by the Fish Inspection and Quality Control Unit of the Seychelles Bureau of Standards, as well as catch certificates (exports above 20 kg) issued by the SFA. However, this information is not published and was not reconciled as part of this FiTI Report

<sup>46</sup> A study was initiated in 2020 to undertake an employment and capacity needs assessment study for the fisheries sector in Seychelles. The release of the study has been delayed due to technical issues.

figure was based on a sample and not a total census. Other studies, such as the Economic Impact of the Sea Cucumber Fishery and Capacity Needs Assessment, offered some details on employment but did not cover the entire sector comprehensively.

The 2022 data continued to show limited government-collected employment information for the post-harvest sector. However, meaningful progress has been made to publish employment information for fisheries-related businesses operating in the ITZ. The figures, from 2022, are published in the 2022 FiTI Report. However, there is still to improve the robustness of the data and compile comprehensive information for this sector on a regular basis.

- ➔ **[B.1.7\_5]** Initially, no collated data on employment in the informal fisheries sector was available, with the 2019 FiTI Report indicating scepticism about its significance. In 2021, the MoFBE recognized the existence of a small informal sector, particularly in sports and recreational fisheries, partially fulfilling Recommendation 2019-7\_3. A statement to that end was published in the 2022 FiTI Report. SFA also initiated a study titled “Assessment of the Economic and Social Importance of Seychelles’ Sport and Recreational Fishery”, which was subsequently published on SFA’s website. Despite the study proving insightful, the report highlighted the need for a more comprehensive assessment that includes additional employment categories.
  
- ➔ **[B.1.7\_6]** No information on wages in the post-harvest sector is collated by the government of Seychelles, and there are no reports or studies that specifically investigate wages in the post-harvest sector which have been published to date on this topic. However, the National Bureau of Statistics (NBS) released the 2022 average earnings data in the Q24 2022 Employment & Earnings Bulletin<sup>47</sup>. This report combines figures for the fisheries, agriculture, and forestry sectors, making it difficult to determine the specific components included for the fisheries sector, particularly relating to post harvest activities.

Furthermore, three studies from 2021, which provide some details about wages in the fisheries industry, can be found on the SFA website. These studies are: "Employment Study and Capacity Needs Assessment for the Fisheries Sector in Seychelles," "Baseline Socioeconomic Study of the Small-Scale Longline Fleet"<sup>48</sup>, and "Economic Impact of the Seychelles Sea Cucumber Fishery and Industry."

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<sup>47</sup> <https://www.nbs.gov.sc/downloads/economic-statistics/employment-earnings/2022>

<sup>48</sup> <https://www.sfa.sc/index.php/e-library/fisheries-report/summary/21-other-reports/171-baseline-socio-economic-study-of-small-scale-longline-fleet>

**Direction of progress:**

Compared to the first validation timeframe, the direction of progress for this transparency requirement remains unchanged. Although some improvements have been shown for certain indicators, it is evident that there is information being collected by the government particularly by NBS, that could be published, such as disaggregated data at species level for exports. Furthermore, the unavailability of 2022 artisanal catch data has also impacted on the level of progress for this standard as artisanal catch data was previously available and published during the first validation period.

**Fisheries Law Enforcement**

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

ID	Validation indicator	Scoring
<b>B.1.8_1</b>	The implementing country must publish information on the national activities and strategies used for ensuring compliance of fishing vessels and the post-harvest sector with national legislation.	<b><i>Inadequate progress</i></b> <b>[1]</b>
<b>B.1.8_2</b>	The implementing country must publish information on the financial and human resources deployed by the government to ensure compliance with national legislation.	<b><i>Inadequate progress</i></b> <b>[1]</b>
<b>B.1.8_3</b>	The implementing country must publish information on the total numbers of inspections of fishing vessels at sea and in ports.	<b><i>Compliant</i></b> <b>[3]</b>
<b>B.1.8_4</b>	The implementing country must publish a record of convictions for major offences in the fisheries sector for the last five years, indicating the name of the company or vessel owner, the nature of the offence and the penalty imposed.	<b><i>Meaningful progress</i></b> <b>[2]</b>
		<b><u>Meaningful progress</u></b> <b>[Avg. 1.7]</b>

**Detailed remarks:**

- ➔ **[B.1.8\_1]** By the end of the second validation timeframe, no comprehensive report had been produced on the national activities and strategies used to ensure compliance of fishing vessels and the post-harvest sector with Seychelles' legislation.

Despite its legal mandate for Monitoring, Control & Surveillance (MCS) and its central role in directing surveillance activities<sup>49</sup>, the SFA is yet to publish an overall MCS strategy. In 2022, the SFA secured funds under the EcoFISH project to finalise the National Plan of Action for Illegal, Unreported and Unregulated (NPOA-IUU) fishing for adoption as a national policy. The plan is expected to be finalised in 2024, outside of this validation timeframe.

Several compliance and policy instruments exist, providing strategic direction regarding fisheries compliance. These are detailed in the 2019 FiTI report. No new compliance-related strategy documents were produced in 2022.

The National MSG noted, once again, that while there were activities being undertaken to monitor certain aspects of the post-harvest sector such as inspections and verifications, there was no overall strategy in place to guide these activities.

A recommendation was made by the National MSG for SFA to provide MFBE with regular information regarding the national strategies and activities applied to ensure compliance of fishing vessels and the post-harvest sector, in the 2019 FiTI Report (2019-8\_1). Addressing this recommendation was due by December 2022 and no information was available on how this had progressed.

- ➔ **[B.1.8\_2]** There is no consolidated information on the financial and human resources deployed by all relevant authorities, for example SFA, Fish Inspection and Quality Control Unit, Seychelles Coast Guard, Air Force, and Environmental Health Section, to ensure compliance with national fisheries legislation.

Besides information on the total budget of SFA's MCS Division, no additional information was published. Given the complexity of collating information across ministries and agencies, no wilful withholding is assumed. Similar, the National MSG decided that compiling such information goes beyond the scope of the FiTI Reports. This lack of

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<sup>49</sup> The 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, the SFA did not publish an overall MCS strategy.

information was addressed in a recommendation by the National MSG in the 2019 FITI Report (ID: 2019-8\_2).

As part of the 2022 reporting process, the SFA informed the National MSG that it had already begun discussions with the National Information Sharing and Coordination Centre (NISCC) and the Seychelles Coast Guard (SCG) to gather the necessary information and improve coordination of enforcement activities. Although the SFA committed to publishing the information for 2022 by early 2023, this has not yet been done.

- ➔ **[B.1.8\_3]** Information on the total numbers of inspections of fishing vessels at sea and in ports is available to the Seychelles' government (on a quarterly basis), and SFA continues to publish annual totals as part of the SFA Annual Report.
  
- ➔ **[B.1.8\_4]** The SFA has published a record of convictions for major offenses in the fishing sector, along with a list of foreign vessels apprehended for illegal, unreported, and unregulated (IUU) fishing between 2020 and 2024, on its website.<sup>50</sup> This list includes some details about the types of offenses recorded and the actions taken by SFA. In a few cases, the name of the vessel involved is also provided. However, it does not include information about vessel owners or the dates of the incidents. The MCS Division within SFA maintains a list of foreign-flagged vessels caught for IUU fishing. This partially fulfils recommendation (2021-8\_1) which advises SFA to publish an up-to-date record of convictions and major offenses in the fisheries sector over the past five years, including the names of companies or vessel owners, the nature of the offense, and the penalties imposed.

#### **Direction of progress:**

Compared to the first validation timeframe, there is no notable change in the direction of transparency progress, as the status of 'meaningful progress' for this transparency requirement is maintained.

### **Labour Standards**

The objective of this requirement is to enhance public access to information around national authorities' strategies and activities to ensure that high labour standards are applied to all

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<sup>50</sup> <https://www.sfa.sc/index.php/division/monitoring-control-and-surveillance/foreign-fishing-agreement-and-%20illegal-fishing?task=download.send&id=206&catid=64&m=0>



parts of Seychelles' fisheries sector and that their efforts to enforcing these standards are well documented.

ID	Validation indicator	Scoring
<b>B.1.9_1</b>	The implementing country must publish a summary description of national laws on labour standards applicable for national and foreign workers employed in the fishing sector at sea and in the post-harvest fisheries sector.	<b>Meaningful progress</b> <b>[2]</b>
<b>B.1.9_2</b>	The implementing country must publish information on the public authorities responsible for monitoring and enforcing laws on labour standards.	<b>Compliant</b> <b>[3]</b>
<b>B.1.9_3</b>	The implementing country must publish documents, including policy statements and evaluations, regarding a national strategy, if applicable, or related activities for enforcing the laws on labour standards in the fisheries sector, including total figures on the financial and human resources deployed by the government.	<b>Compliant</b> <b>[3]</b>
<b>B.1.9_4</b>	The implementing country must publish information on the role and legal standing of anybody that has a governmental mandate to receive labour-related complaints from workers in the fishing sector and in the post-harvest sector.	<b>Compliant</b> <b>[3]</b>
<b>B.1.9_5</b>	The implementing country must publish the total number of offences committed by employers in the fisheries sector that have been resolved by the authorities.	<b>Compliant</b> <b>[3]</b>
		<b>Compliant</b> <b>[Avg. 2.8]</b>

**Detailed remarks:**

- ➔ **[B.1.9\_1]** The Seychelles government has made progress by publishing a summary of labour laws applicable to the fishing sector on the Employment Department's website, based on the Employment Act 1995.<sup>51</sup> However, this summary does not address specific provisions for workers in the International Trade Zone (ITZ), where different regulations apply, notably regarding overtime, wage deductions, and employment benefits. As the National Multi-Stakeholder Group previously recommended that the publication of such

<sup>51</sup> <http://www.employment.gov.sc/component/edocman/employment-legislation-presentation-2023>

a summary include laws and regulations relating to employees working in the Seychelles ITZ (ID: 2019\_9\_1), thus, this recommendation has only been partially fulfilled.

Additionally, a gap analysis for adopting the ILO Work in Fishing Convention has been finalized, but progress is stalled due to the absence of an appointed authority to oversee its implementation.

- ➔ **[B.1.9\_2]** The Ministry of Employment and Social Affairs (MESA) is responsible for monitoring and enforcing laws on labour standards in the fisheries sector in Seychelles (as well as in other sectors). A statement to that effect is clearly published and remains on the information page related to the Labour Relation Division of the MESA, but not yet on the website of MoFBE or SFA.
  
- ➔ **[B.1.9\_3]** Various government documents exist that addresses specific areas of labour standards (e.g. the *Fisheries Comprehensive Plan*), which are accessible online on the MoFBE website<sup>52</sup>. Furthermore, information regarding the financial and human resources deployed to enforce the laws on labour standards in the fisheries sector is published in the FiTI Reports.<sup>53</sup>

The publication of national labour laws applicable to both national and foreign workers through the Employment Department's website is a crucial step forward, though it is important to expand this information to cover specific provisions for International Trade Zone (ITZ) employees. Additionally, the Ministry of Employment and Social Affairs (MESA) has been identified as the key body responsible for monitoring and enforcement, which is critical for ensuring accountability, especially in the ITZ sector. Key policy documents now reflect the integration of labour standards within broader fisheries management strategies, though regular updates and greater accessibility of these documents are needed.

- ➔ **[B.1.9\_4]** Complaints related to workers' grievances (including stemming from the fisheries sector) are channelled through the Labour Relation Division of the MESA. A statement to that effect is clearly published on the information page related to the Labour Relation Division of the MESA, but not yet on the website of MoFBE or SFA.

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<sup>52</sup> <http://www.mofbe.gov.sc/wp-content/uploads/Fisheries-Comprehensive-Plan-Final.pdf>

<sup>53</sup> For 2022, MESA reported that it has 13 inspectors enforcing labour standards across all sectors of the economy, including fisheries.

Efforts to handle worker complaints have also progressed, with established channels within MESA and the FSA, supported by NGOs, providing mechanisms for addressing grievances. However, making the complaint process more transparent and ensuring systematic documentation would improve effectiveness.

- ➔ **[B.1.9\_5]** The number of offences committed by employers in the fisheries sector that have been resolved by the authorities have not yet been published by MESA, MoFBE or SFA.

As part of the 2022 reporting process, MESA reported that no labour offences were recorded for the fisheries sector in this calendar year. Furthermore, information relating to grievances received and offences committed from 2020 to 2022 was published in the 2022 FiTI Report.

**Direction of progress:**

Compared to the first validation timeframe, there is no notable change in the direction of transparency progress, as the status of ‘meaningful progress’ for this transparency requirement is maintained.

**Fisheries Subsidies**

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

ID	Validation indicator	Scoring
<b>B.1.10_1</b>	The government must publish information on the type, values and recipients of government financial transfers or subsidies to the fisheries sector.	<b><i>Meaningful progress</i></b> <b>[2]</b>
<b>B.1.10_2</b>	The government must publish information on the average annual value of any fuel subsidies per unit of fuel in nominal and percentage terms.	<b><i>Compliant</i></b> <b>[3]</b>
		<b><u>Compliant</u></b> <b>[Avg. 2.5]</b>

**Detailed remarks:**

- ➔ **[B.1.10\_1]** The issue of subsidies in the Seychelles fisheries sector was addressed during the 2021 FiTI reporting process. The MoFBE confirmed that there are no subsidies specifically for the large-scale fisheries sector. It was clarified that large-scale fishing vessels benefit from duty-free fuel purchases at Port Victoria, a benefit extended to all international vessels, not just those in the fisheries sector. This clarification has yet to be published on a government website.

For small-scale fisheries, the information on subsidies from the 2019 FiTI Report remains applicable as of 2022.

A National MSG recommendation to publish a 2017 report that reviewed subsidies provided to the artisanal fisheries sector', commissioned by the SFA, was completed within this validation timeframe. The 2017 review of subsidies for the artisanal fisheries sector, published on the Seychelles Fishing Authority's website as part of the 2020 FiTI reporting process, continues to be accessible.

Previous FiTI Reports highlighted that the lack of information on subsidies challenges national legal obligations, such as those outlined in Seychelles' Access to Information Act. This Act requires government organizations to disclose detailed information on the design and implementation of any subsidy programs funded by public money. In response, the National MSG recommended that the government publish comprehensive information on subsidies for large-scale and small-scale fisheries by December 2022 - this recommendation has now been fully implemented.

- ➔ **[B.1.10\_2]** Information about the fuel incentive scheme (FIS) for the small-scale fishing sector is available online from the SFA website. Furthermore, based on information obtained from SFA as part of both FiTI reporting processes, the total values of fuel subsidies given to the small-scale fishing sector were reported in the 2021 and 2022 FiTI Reports.

The 2020 FiTI Report noted the Seychelles government's focus on improving efficiency in the fisheries industry to address overcapacity and subsidy dependency in the small-scale sector. Currently, only fuel and ice subsidies for the artisanal fisheries sector are regularly reported. During the 2022 FiTI reporting process, it was noted that the MoFBE commissioned a study to evaluate subsidies across all fisheries subsectors and quantify public support programs beyond just fuel and ice. The status of the report completion remains unknown and should be clarified in the 2023 reporting process.

**Direction of progress:**

Compared to the first validation timeframe, the direction of progress has improved, in particular by the government clarifying certain aspects of fisheries subsidies in Seychelles (such as whether government financial transfers or subsidies are given to the country’s large-scale commercial fisheries sector).

### Official Development Assistance

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

ID	Validation indicator	Scoring
<b>B.1.11_1</b>	The government must publish information on public sector projects related to fisheries and marine conservation, funded by bilateral, multilateral and private donors, including information on the projects’ value, purpose and outputs.	<b>Meaningful progress</b> [2]
<b>B.1.11_2</b>	The government must publish corresponding project evaluations, if applicable.	<b>Compliant</b> [3]
		<b>Compliant</b> [Avg. 2.5]

#### Detailed remarks:

- ➔ **[B.1.11\_1]** According to the 1<sup>st</sup> validation report, Seychelles’ national authorities had not published any information on public sector development projects online. However, the SFA has now published an online database of fisheries-related projects funded through Official Development Assistance (ODA), providing updated information for active projects. Additionally, as part of both FiTI reporting processes for 2021 and 2022, a list of fisheries-related public sector development projects has been provided in the FiTI Reports (Annex C).

However, although this information is available, and some projects are published on the MoFBE website<sup>54</sup>, for example projects funded under the World Bank SWIOFish3

<sup>54</sup> <https://mofbe.gov.sc/swiofish3/>

programme, the Seychelles government has yet to create a central repository for *conservation-related public sector development projects*.

- ➔ **[B.1.11\_2]** A mid-term evaluation of the implementation of the SWIOFish3 project was done in 2021 and has been published online.<sup>55</sup> No other evaluations of public sector projects have been identified by the national MSG in the 2022 FiTI report.

### **Direction of progress:**

Compared to the first validation timeframe, the direction of progress must be seen as worsening. While the government is still providing the relevant information to compile such information as part of the FiTI Reporting process, enabling the National MSG to publish this information in their FiTI Reports, no endeavours are seen by the government to make this information available online (e.g. as part of the SFA FIMS).

### **Beneficial Ownership**

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

ID	Validation indicator	Scoring
<b>B.1.12_1</b>	The government must publish the legal basis for beneficial ownership transparency in the country.	<b>Compliant [3]</b>
<b>B.1.12_2</b>	The government must publish the country's legal definition of beneficial ownership.	<b>Compliant [3]</b>
<b>B.1.12_3</b>	The government must publish information on the availability of a public register of beneficial owners.	<b>Compliant [3]</b>
<b>B.1.12_4</b>	The government must publish the rules and procedures for incorporating beneficial ownership in filings by companies to corporate regulators, stock exchanges or agencies regulating the access to fisheries.	<b>Compliant [3]</b>

<sup>55</sup> <https://swiofish3.sc/wp-content/uploads/2022/07/Facing-Page-SWIOFish3-Mid-Term-Review-.pdf>

ID	Validation indicator	Scoring
B.1.12_5	The government must publish the current status and discussions around beneficial ownership transparency in fisheries.	<b>Compliant [3]</b>
		<b>Compliant</b> [Avg. 3.0]

**Detailed remarks:**

- ➔ **[B.1.12\_1]** The Beneficial Ownership Act (2020) as well as the Beneficial Ownership Regulations (2020) are the legal basis for beneficial ownership transparency in the country. These documents are published online by the Seychelles Financial Services Authority.<sup>56</sup> The legal framework and definition of beneficial ownership in the fisheries sector is outlined in the Fisheries Act (2014). The Beneficial Ownership Regulations (2020) established the requirements for beneficial ownership registration beyond the vessel licensing and fishing activity permits mandated by the Fisheries Act (2014). To ensure compliance with international standards set by the Financial Action Task Force (FATF) and OECD, the Beneficial Ownership (Amendment) Act 2023 and the Beneficial Ownership (Amendment) Regulations were enacted as of December 2022.
- ➔ **[B.1.12\_2]** The definition of a beneficial owner is part of the Beneficial Ownership Act (2020).
- ➔ **[B.1.12\_3]** A central register of beneficial owners has been established in Seychelles. This registry is not available to the general public.<sup>57</sup> Access to the Beneficial Ownership Database is not public and is restricted by the Beneficial Ownership Act (2020) and Beneficial Ownership Regulations (2020) to a number of Competent Authorities defined in the Beneficial Ownership Act. Reference to the availability and accessibility of this registry are made in both FiTI Reports.
- ➔ **[B.1.12\_4]** The general rules and procedures regarding beneficial ownership are published by the Seychelles Financial Services Authority, e.g. in the Beneficial Ownership Guidelines (Version 2020). However, the National MSG determined that beneficial

<sup>56</sup> <https://fsaseychelles.sc/aml-cft/beneficial-ownership>

<sup>57</sup> The FiTI Standard does not request that such a registry is available or made publicly accessible, and instead just requires governments to provide information about the availability of such a registry.

ownership transparency in fisheries has been neglected in Seychelles, despite international policy debates and national obligations.<sup>58</sup> This lack of information regarding beneficial ownership in fisheries was clearly stated in both FiTI Reports. It is highlighted that although the BO Act is not industry-specific, it captures all legal persons or arrangements registered in Seychelles, both by the Financial Services Authority and the Registrar. As such, if a fishing vessel is owned by a legal person or arrangement registered in Seychelles, that legal person/arrangement is subjected to the BO Act and must maintain, through their resident agents, a Register of Beneficial Owners, and populate their beneficial ownership information in the central database.

The 2021 FiTI Report highlighted that, while the Fisheries Act requires the SFA to collect beneficial ownership information upon the registration of fishing vessels, this is seldom done due to the absence of enforcement mechanisms. The Act does not penalize vessel operators for failing to disclose beneficial ownership details, rendering compliance voluntary rather than mandatory. Despite this, information on beneficial ownership in the small-scale fisheries sector is largely publicly accessible, promoting transparency. In 2022, SFA made significant improvements by revising application forms to ensure the capture of beneficial ownership information during the license application process for local artisanal fisheries. This information is now publicly available through the publication of license details, partially fulfilling recommendation [ID:2021\_12\_1; Priority: High; Due date: December 2023]. However, for industrial fishing vessels, while application forms now include the names of business owners—typically corporates and corporate shareholders—beneficial ownership information is captured infrequently. These developments mark an advancement in transparency for small-scale fisheries, but capturing and publicizing such information for industrial fishing vessels remains limited. The absence of penalties for non-disclosure continues to be a significant gap in ensuring compliance.

The 2022 FiTI Report emphasises that very few of the Seychelles-flagged vessels in the *IOTC Record of Currently Authorised Vessels* have actual beneficial owner information listed.

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<sup>58</sup> 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.



- ➔ **[B.1.12\_5]** The current status and discussions around beneficial ownership transparency in Seychelles' fisheries highlight several key issues. Most Seychelles-flagged industrial fishing vessels are owned by locally registered corporate entities, which must register their beneficial ownership information in a central database, as per the Beneficial Ownership Act. However, this requirement does not apply to foreign-owned vessels, whose beneficial ownership information is only captured during license applications.

The inclusion of this information is often part of fisheries agreement negotiations, and the license application form is annexed to these agreements. However, application forms for valid fishing agreements in 2022 did not explicitly require beneficial ownership information. In 2022, several initiatives aimed at improving transparency were underway, including a Memorandum of Understanding (MOU) between the SFA and the Financial Intelligence Unit (FIU) to access beneficial ownership data from the FIU.

To address these gaps, the MoFBE, with funding from SWIOFish3, commissioned a gap analysis of beneficial ownership in the fisheries sector and to develop a legal framework for joint ventures, this was recommended by the National MSG (ID:2021\_12\_2). Stakeholder workshops were held in 2022 and 2023 to discuss preliminary findings, which will inform future policies and the review of existing legislation. The outcomes of this initiative are not publicly available.

#### **Direction of progress:**

Compared to the first validation timeframe, the level of transparency for beneficial ownership has been maintained. This is despite the fact that the national authorities have commissioned a study on beneficial ownership in Seychelles' fisheries, which provides significant insights into the current situation, challenges and improvement recommendations. However, this study is not yet publicly available.

## **4) Assessment of individual 'procedural requirements for FiTI Reports'**

The assessment of the procedural requirements of Seychelles' FiTI Reports consists of **four validation elements**. The assessment looks at both of Seychelles' FiTI Reports that fall within the validation timeframe (2022, 2024).

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

## Reporting Requirements

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

### Detailed remarks:

- ➔ [\[B.2.1\\_1\]](#) Seychelles has submitted two FiTI Reports within the validation period, covering the information for the calendar years 2021 and 2022, without any gaps between the reports. The Report Compiler for the 2023 FiTI Report has been appointed and the report is expected to be published by December 2024.
- ➔ [\[B.2.1\\_2\]](#) Both FiTI Reports clearly state in their summary sections whether information is available to the government, whether the information published on a government website is freely accessible, and whether the information is seen as complete by the

National MSG. The National MSG's assessment for each of those questions are shown via water drops, facilitating an intuitive understanding of the current situation.

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

- ➔ **[B.2.1\_3]** Both FiTI Reports include references (i.e. hyperlinks, typically as footnotes) to where information can be found online on government websites.
- ➔ **[B.2.1\_4]** The 2022 FiTI Report provides explanations for significant deviations from the previous reporting period (i.e. 2021 FiTI Report). Such explanations cover two aspects:
  - 1) Deviations in the underlying information (e.g. payments from large vessels) are clearly shown in the 2022 FiTI Report by comparing the current information to information from the previous calendar year. This allows for a simple comparison between the two reporting periods (e.g. 2021 and 2022).
  - 2) Deviations in the transparency performance are explained in the 2022 FiTI Report (e.g. foreign fishing access agreements have been published online; confidentiality clauses have been).
- ➔ **[B.2.1\_5]** Both FiTI Reports include recommendations from the National MSG for how the Seychelles' government can strengthen the availability of accessible, complete and up-to-date information in the public domain. More information on the scope, level of detail as well as implementation status of these recommendations is described in chapter 6 of this document ('Appraisal of progressive improvements').

**Direction of progress:**

Compared to the first validation timeframe, the direction of progress for this requirement has not changed, remaining on a compliant level.

## Reporting Deadlines and Periods

ID	Validation indicator	Scoring
<b>B.2.2_1</b>	The country's 1 <sup>st</sup> FiTI Report must be published within the subsequent year of becoming a FiTI Candidate country.	<b><i>Not applicable</i></b>
<b>B.2.2_2</b>	The country's 1 <sup>st</sup> FiTI Report must contain information on transparency requirements 1 – 6, set forth in section B.1 of the FiTI Standard.	<b><i>Not applicable</i></b>
<b>B.2.2_3</b>	The country's 1 <sup>st</sup> FiTI Report must contain information from the complete calendar year when the country became a FiTI Candidate country.	<b><i>Not applicable</i></b>
<b>B.2.2_4</b>	Following the 1 <sup>st</sup> FiTI Report, subsequent FiTI Reports must be published on an annual basis, comprising information from the complete calendar year preceding the year addressed in the last FiTI Report.	<b><i>Meaningful progress [2]</i></b>
<b>B.2.2_5</b>	Every second FiTI Report must include information on transparency requirements 7 – 12 set forth in section B.1 of the FiTI Standard, and this information must be disaggregated by calendar years.	<b><i>Compliant [3]</i></b>
		<b><u><i>Compliant</i></u> <i>[Avg. 2.5]</i></b>

### Detailed remarks:

- ➔ **[B.2.2\_4]** While both FiTI Reports were published after the end of their respective deadlines, both FiTI Reports were given an extension from the FiTI International Board to do so. Both reports comprised of information from the previous complete calendar year (i.e. 2021, 2022).
- ➔ **[B.2.2\_5]** Both the Seychelles' 2021 and 2022 FiTI Report covered all 12 transparency requirements of the FiTI Standard, as shown above [B.2.2\_1].

*[Efforts that exceed the requirements of the FiTI Standard]* According to the FiTI Standard, the minimum obligation to cover all 12 transparency requirements is every second year. From the beginning, Seychelles' National MSG has published every year FiTI Reports that cover all 12 transparency requirements.

**[Direction of progress]**

Compared to the first validation timeframe, the direction of progress for this requirement has slightly deteriorated, as both FiTI Reports were only published with a significant delay (although approved via an official extension request from the FiTI International Board).

**Reporting Process**

ID	Validation indicator	Scoring
<b>B.2.3_1</b>	The country's FiTI Reports must be compiled by an independent, credible, trustworthy and technically competent Report Compiler.	<b><i>Compliant [3]</i></b>
<b>B.2.3_2</b>	The engagement of the country's Report Compilers must be based on Terms of Reference, which must include minimum procedures for FiTI Reports, as endorsed by the FiTI International Board. <sup>59</sup>	<b><i>Compliant [3]</i></b>
<b>B.2.3_3</b>	The appointment of the country's Report Compiler must be endorsed by the National MSG.	<b><i>Compliant [3]</i></b>
<b>B.2.3_4</b>	The National MSG and the Report Compiler must work jointly to ensure that the entire FiTI reporting process is perceived as open and inclusive.	<b><i>Compliant [3]</i></b>
<b>B.2.3_5</b>	The Report Compiler must consult with relevant national and international organisations to ensure that the assessment on the transparency requirements is perceived as credible and trustworthy, and that all appropriate sources of information are considered.	<b><i>Compliant [3]</i></b>
<b>B.2.3_6</b>	The Report Compiler must seek to resolve the discrepancies between published government information and information from other stakeholders, if applicable. <sup>60</sup>	<b><i>Compliant [3]</i></b>
<b>B.2.3_7</b>	The Report Compiler must consolidate the findings in a preliminary FiTI Report and submit it to the National MSG for review.	<b><i>Compliant [3]</i></b>

<sup>59</sup> The FiTI Standard states that ToRs may be adapted to include additional transparency requirements beyond those established in the FiTI Standard, if this is agreed upon by the National MSG.

<sup>60</sup> This also includes information that is published on government websites vs. information that is provided in a FiTI Report.

ID	Validation indicator	Scoring
<b>B.2.3_8</b>	The National MSG must review the preliminary findings of the Report Compiler and provide comments. <sup>61</sup>	<b>Compliant [3]</b>
<b>B.2.3_9</b>	The National MSG must formally approve the FiTI Reports and publish them afterwards.	<b>Meaningful progress [2]</b>
<b>B.2.3_10</b>	The National MSG must consult with the FiTI International Secretariat prior to publishing its first FiTI Report to review completeness against the FiTI reporting requirements.	<b>Not applicable</b>
		<b>Compliant [Avg. 2.8]</b>

**Detailed remarks:**

- ➔ **[B.2.3\_1]** Both FiTI Reports, available for this validation timeframe, were prepared by Ms Daniella Larue, appointed as the country’s external Report Compiler. Ms Larue is based in the Seychelles and is a consultant with wide experience in the field of management and consulting. Daniella Larue was not and is not part of the National MSG.
- ➔ **[B.2.3\_2]** The 2021 FiTI Report was financed by an external party, i.e. the Third South West Indian Ocean Fisheries Governance and Shared Growth Project (SWIOFish3), whereas the 2022 FiTI Report was financed by the SFA. The engagement of the country’s Report Compiler was conducted through each party’s own procurement processes. Nevertheless, the engagement was based on Terms of Reference that comply with the minimum procedures for FiTI Reports, as outlined in FiTI Guidance Note #2.
- ➔ **[B.2.3\_3]** The appointment of Ms Larue as Seychelles’ 2021 and 2022 FiTI Report Compiler was endorsed during meetings of the National MSG. This endorsement has been documented in the meeting minutes of the National MSG.
- ➔ **[B.2.3\_4]** No evidence was found that the National MSG and the Report Compiler failed to work together jointly to ensure the entire FiTI reporting process (for both FiTI Reports) was open and inclusive.

<sup>61</sup> The FiTI Standard encourages the National MSG to consult with others outside of the National MSG in undertaking this review. However, this is not a mandatory requirement and therefore, falls outside of the scope of the validation.

- ➔ **[B.2.3\_5]** The Report Compiler consulted with several organisations based in Seychelles to ensure that the FiTI Reports are seen as credible and trustworthy, and that all appropriate sources of information are considered. This included consultations with the SFA, the Department of Fisheries within the Ministry of Fisheries and Blue Economy, the Financial Intelligence Unit, the Department of Information Communications Technology, the Department of Employment, SeyCCAT, Seychelles Ports Authority, Apostolat de La Mer and Seychelles Federation of Workers' Union. Detailed information regarding the consultations conducted during the preparation of the FiTI Reports are listed as annexes (Annex B) in both Detailed FiTI Reports.
- ➔ **[B.2.3\_6]** Some initial discrepancies were found by the Report Compiler, in particular during the preparation of Seychelles' 2022 FiTI Report. For example, Ms. Larue expressed concerns about inconsistencies in the distribution of a reported quota of 36,587 Mt among 13 purse seiners. It was explained that although the reported quota was correct, it was not evenly distributed among the purse seiners. This was supported by information from the consultant responsible for the SFA Annual Report. The National MSG recognised the discrepancies, agreed to document them for future reference, and noted them in the minutes.
- ➔ **[B.2.3\_7]** For both reporting periods, the Report Compiler consolidate her findings in several preliminary FiTI Reports and submit them to the National MSG for review.
- ➔ **[B.2.3\_8]** For both reporting periods, members of the National MSG reviewed the preliminary findings of the Report Compiler and provided comments. It was noted by the Report Compiler that more members of the National MSG were involved in the review of the country's 2021 FiTI Report, then in the 2022 FiTI Report. This was mainly due to changes in the composition of the National MSG.
- ➔ **[B.2.3\_9]** Both FiTI Reports were approved by the National MSG during their meetings. However, these approvals have not been formally documented in the meeting minutes.

**Direction of progress:**

Compared to the first validation timeframe, the direction of progress for this requirement has not changed significantly, remaining on a compliant level. The appointment of the Report Compiler was properly endorsed and documented. Collaborative efforts between the National MSG and the Report Compiler ensured a transparent and inclusive reporting process, with

comprehensive consultations documented. However, the formal documentation of report approvals in the meeting minutes is lacking.

## Report Dissemination and Public Debate

ID	Validation indicator	Scoring
<b>B.2.4_1</b>	FiTI Reports must be comprehensible and written in a clear and accessible style.	<b><i>Compliant [3]</i></b>
<b>B.2.4_2</b>	FiTI Reports must be widely distributed among key audiences, including government, parliamentarians, companies, civil society groups, academia, the media, and international stakeholders.	<b><i>Compliant [3]</i></b>
<b>B.2.4_3</b>	The National MSG must ensure that the main findings of the FiTI Report contribute to public debates on how the fisheries sector is managed, enabling relevant stakeholders as well as citizens of FiTI implementing countries to demand reforms towards better governance of their marine fisheries. <sup>62</sup>	<b><i>Inadequate progress [1]</i></b>
<b>B.2.4_4</b>	FiTI Reports must be published online under an open license.	<b><i>Inadequate progress [1]</i></b>
<b>B.2.4_5</b>	The National MSG must make users aware that information can be reused without prior consent.	<b><i>Inadequate progress [1]</i></b>
		<b><i>Meaningful progress [Avg. 1.8]</i></b>

### Detailed remarks:

- ➔ **[B.2.4\_1]** Both FiTI Reports are seen as being written in clear, non-technical language and due to the usage of various visualisation elements (e.g. charts, water drops, icons) in a very accessible style. Additionally, the reports continue to be divided into a summary and a detailed version, following previous stakeholder feedback. The current FiTI Summary Report is kept under 55 pages, while the Detailed Report is under 110 pages. There has been an increase in the length of the Reports, which is due to more information being added.

<sup>62</sup> The FiTI Standard encourages National MSGs to contribute the lessons learnt and recommendations from FiTI Reports to policy dialogues and broader conversations about national reform efforts. However, this is not a mandatory requirement and therefore, falls outside of the scope of the validation.



- ➔ **[B.2.4\_2]** Both FiTI Reports have been widely distributed among key stakeholders. Notable examples include:
- Both FiTI Reports were featured among *Seychelles' media outlets*, including newspaper articles as well as TV and radio interviews.<sup>63</sup>
  - The Ministry of Foreign Affairs and Tourism sent out an official *Note Verbale* to local embassies notifying them of the publication reports and providing digital copies of the summary report.
  - The Ministry of Fisheries and Blue Economy of Seychelles, WWF Madagascar and the FiTI International Secretariat organised a *national transparency workshop* to present the 2021 FiTI Report and to identify mechanisms to move the country from increased public availability of fisheries information towards greater participatory governance of the sector.<sup>64</sup>
  - Two one-day *media training workshops* were organised in 2023 and 2024, attended by local media representatives. The workshops focused on enhancing the role of media in utilising and disseminating information from FiTI reports. The workshop was organised in collaboration with the Danny Faure Foundation.
  - Seychelles' 2021 FiTI Report was showcased at the *Seychelles Maritime Academy* (SMA) fair during the launch of the Seychelles Fisheries Week in 2021. The FiTI National Secretariat provided information about FiTI and presented information about the report to attendees.
  - The FiTI National Lead and FiTI International Secretariat presented the 2022 FiTI Report to the *Cabinet of Ministers* (including Seychelles' President), emphasising the importance of transparency for sustainable marine fisheries and the potential for broader improvements.<sup>65</sup>

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

- ➔ **[B.2.4\_3]** There remains no formalised approach to how the main findings of the FiTI Report contribute to public debates on how the fisheries sector is managed, nor how this

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<sup>63</sup> The FiTI National Lead interview in the "Bonjour Sesel" programme:

<https://www.youtube.com/watch?v=hXcRXwnmGVQ>

<sup>64</sup> <https://fiti.global/utilising-fisheriestransparency-to-support-participatory-governance>

<sup>65</sup> <https://www.statehouse.gov.sc/cabinet-decisions/6156/cabinet-business-thursday-23rd-may-2024>

information can feed into public policy making. Lessons learned from previous reporting cycles showed, however, that an increase in public information does not directly lead to more (non-governmental) stakeholder involvement in public policy making. Furthermore, while calls for participation are often and manifold, these calls are not always clearly defined regarding its purpose, why an increase in participation is seen as beneficial or who should be involved in such participatory processes in fisheries. The FiTI National Lead approached the FiTI International Secretariat to address this matter, resulting in an (currently still ongoing) pilot project on strengthening inclusive fisheries policy-making in Seychelles.<sup>66</sup>

However, anecdotal evidence shows improvements of the FiTI, FiTI Reports and transparency in various fisheries forums. For example, discussions on the Seychelles Tuna Fishery Management Plan at an SFA workshop included contributions from civil society on topics such as transparency, access to information (e.g. FADs), and better monitoring practices.

- ➔ **[B.2.4\_4]** All Reports have been published online (on the website of the SFA and MoFBE)<sup>67</sup>. However, there is no evidence that the reports have been published under an open and unrestricted license, such as those developed by Creative Commons. Given that (in Seychelles' case) the FiTI Reports are currently used to display a significant amount of information which is not available on government websites, such licences should be published and linked to open data to ensure users can easily find and understand the conditions of data access and reuse.
- ➔ **[B.2.4\_5]** The National MSG has not made users explicitly aware that information published within both FiTI Reports can be reused. Furthermore, the National MSG has not made the relevant sections of the FiTI Reports' annexes available online in an open data format (e.g. csv, xml).

### **Direction of progress:**

Compared to the first validation timeframe, the direction of progress shows a slight improvement, in particular in the government's efforts to start enhancing more inclusive decision-making processes. However, this development is not yet fully sufficient in itself, and

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<sup>66</sup> <https://fiti.global/fiti-and-peoplepowered-collaborate-inclusive-policymaking-in-fisheries>

<sup>67</sup> <https://www.sfa.sc/> and <https://mofbe.gov.sc/fiti/>

in particular the National MSG needs to enhance its activities to ensure that the notable increase in fisheries transparency leads to meaningful progress ‘on the ground’.

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

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

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

### Enabling Environment for Stakeholder Participation

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

#### Detailed remarks:

- ➔ **[B.3.1\_1]** Seychelles is recognized for fostering an environment where stakeholders can openly engage in public debates and freely express their opinions. This is underpinned by the constitutional guarantee of freedom of expression.<sup>68</sup>

In 2018, Seychelles introduced its Access to Information Act following a comprehensive, three-year development process. Civil society played a crucial role in shaping the

<sup>68</sup> <https://www.judiciary.sc/wp-content/uploads/2024/06/chief-justice-rony-govinden-speech.pdf>  
<https://www.judiciary.sc/news/30-years-of-the-constitution-promoting-press-freedom/>

legislation, which drew on the African Commission on Human and Peoples' Rights' draft model law. The Seychelles National Development Strategy for 2019–2023 highlighted a commitment to improving transparency, access to information and public participation in decision-making. Looking ahead, the new National Development Strategy for 2024–2028, launched in April 2024, continues to emphasize these objectives and aims to further enhance transparency and public engagement.

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

- The most current *Global Right to Information (RTI)* Rating positions Seychelles as 30<sup>th</sup> out of 140 countries. This rating reflects that the Access to Information Act in Seychelles provides extensive access to information and includes provisions to facilitate the process of requesting information;<sup>69</sup>
- According to the 2023 report by the international non-governmental organization Freedom House, *press freedom* in Seychelles is classified as 'free,' with a score of 79 out of 100. This represents an improvement from the country's 2021 score of 77.<sup>70</sup>
- Seychelles continues to enhance its overall *governance performance* according to the Ibrahim Index of African Governance (IIAG). Seychelles ranked 2<sup>nd</sup> out of 54 countries in 'Overall Governance,' improving from its previous 3<sup>rd</sup> place. The detailed score increased to 77.3, up from the earlier score of 75.3 out of 100 in the category 'Participation, Rights, and Inclusion'.<sup>71</sup>

Anecdotal evidence indicates that non-governmental fisheries stakeholders are increasingly voicing their concerns to the government and fishing companies. This includes public criticism about the previous exclusion of non-governmental stakeholders from negotiations on foreign fishing access agreements and broader concerns about foreign fishing activities in Seychelles waters.

This assessment found no legal, regulatory, or administrative barriers hindering the participation of business or civil society stakeholders in Seychelles' FiTI implementation process. Additionally, it revealed no evidence suggesting that civil society or business representatives were:

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<sup>69</sup> <https://www.rti-rating.org/country-data/Seychelles/>

<sup>70</sup> <https://freedomhouse.org/country/seychelles/freedom-world/2023>

<sup>71</sup> <https://iiag.online/locations/sc.html>

- ➔ restricted from participating in the FiTI National MSG or from providing input for key documents of the FiTI implementation process, such as the National MSG’s workplan or FiTI Reports;
- ➔ hindered from engaging in public debate, or refrained from expressing their opinions due to fear of reprisal;
- ➔ discouraged from communicating information and opinions related to the FiTI implementation to the media, or the media from publishing such information and opinions due to threats of administrative measures, sanctions, or bars on publication;
- ➔ restricted from carrying out activities relating to the FiTI due to registration requirements or related fees;
- ➔ unable to consult, engage with, share with or seek information from local communities regarding issues related to the FiTI implementation process in Seychelles or the National MSG’s work;
- ➔ unable to cooperate with colleagues in civil society, business and government, either within or outside Seychelles in relation to discussions about National MSG representation or the FiTI process;

Nevertheless, it needs to be acknowledged that civil society and business involvement in Seychelles’ FiTI implementation process is currently limited to members of the National MSG. This lack of engagement is not attributed to any legal or practical restrictions but rather to a general absence of involvement. For instance, the International Secretariat is not aware of any constituency meetings conducted by National MSG members. Although the National MSG has been opened to observers (such as technical personnel from the SFA, Seychelles’ Media Commission and Information Commission), most organisation have not seized the opportunity to attend these meetings.

*[Efforts that exceed the requirements of the FiTI Standard]* Seychelles joined the Open Government Partnership (OGP)<sup>72</sup> in 2018, aiming to enhance transparency, accountability, and civic engagement. The country’s first National OGP Action Plan (2019-2021) included commitments to improve public sector responsiveness, implement the Access to Information Act, and adopt the Fisheries Transparency Initiative (FiTI). While the implementation of several commitments were significantly hindered by the COVID-19 pandemic and political changes (including a presidential election that resulted in a

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<sup>72</sup> <https://www.opengovpartnership.org/documents/seychelles-design-report-2019-2021/>  
<https://www.opengovpartnership.org/documents/seychelles-transitional-results-report-2019-2021/>

major shift in government and budget priorities), the commitment to the FiTI saw substantial implementation progress.

The country’s second National OGP Action Plan<sup>73</sup> continued the commitment towards the FiTI, with an emphasis on strengthening stakeholder participation and transparency in the fisheries sector. The new plan addresses ongoing challenges such as historical mistrust, limited public involvement, and the need for accessible and relevant fisheries information. Key recommendations include enhancing the online availability of fisheries data, formalizing stakeholder engagement strategies, and establishing robust institutional arrangements to ensure long-term compliance with the FiTI Standard.

**Direction of progress:**

Compared to the first validation timeframe, there has been no change in the implementation of this requirement, meaning that Seychelles maintained its enabling environment for stakeholder participation in fisheries transparency.

**Governance and Support**

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

**Detailed remarks:**

- ➔ **[B.3.2\_1]** Throughout the current validation period, both the FiTI Lead Ministry (the Department of Blue Economy) and the FiTI National Lead (Mr Philippe Michaud) have

<sup>73</sup> <https://www.opengovpartnership.org/documents/seychelles-action-plan-2023-2025-december/>

remained unchanged. This continuity has been a key factor in the successful implementation of the FiTI over the past two years.

- ➔ **[B.3.2\_2]** Not applicable.
- ➔ **[B.3.2\_3]** The official responsibility for the FiTI National Secretariat has been transferred from the SFA to the Department of the Blue Economy. As a result of the Seychelles’ first validation (and the corresponding corrective actions), the MoFBE assigned the responsibility to a staff member, who executed this responsibility (among other tasks) for about one year. Recently, a new staff member was appointed by the MoFBE. However, the National MSG has not been consulted on this matter, and it is not unclear what the National MSG’s position is on this recent change. Both staff changes resulted in a significant improvement of the operational support for the FiTI National Lead and the National MSG. However, given that these staff members are not assigned FiTI responsibilities exclusively, it remains to be seen if sufficient time will be allocated for these staff members to fulfil their increasing duties in the FiTI implementation process. Furthermore, national authorities are also considering the appointment of a national coordinator for all related transparency/open government efforts, including the FiTI, the Extractive Industries Transparency Initiative (EITI), and the Open Government Partnership (OGP).

**Direction of progress:**

Compared to the first validation timeframe, there has been notable improvements with regards to the governance and support of the FiTI implementation process, and the direction of progress seems overall positive. In particular, ongoing efforts on how to strengthen the support given to the National MSG by the National Secretariat is positive. At the same time, uncertainty remains on the extent of such support, as the National Secretariat does not seem to be fully institutionalised within the FiTI Lead Ministry (e.g. through clear role descriptions and time allocations).

**Multi-Stakeholder Oversight**

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

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

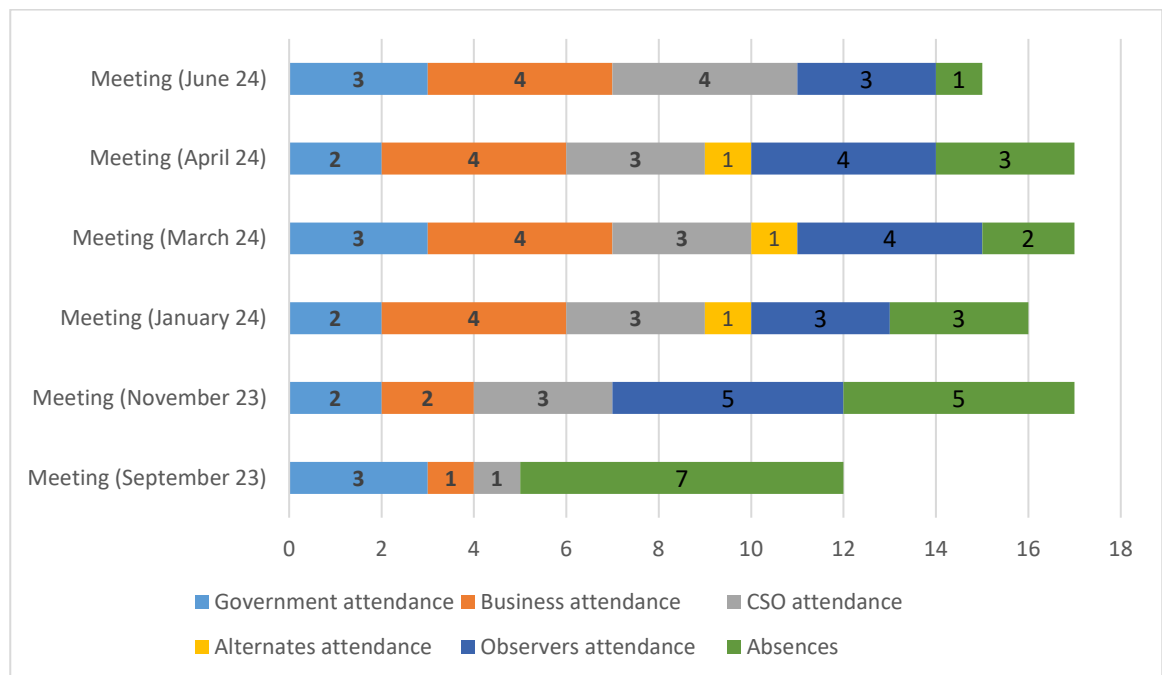
**Detailed remarks:**

- ➔ **[B.3.3\_1]** The FiTI National MSG continues to consist of 12 representatives, with equal representation from the government, business, and civil society groups. To enhance inclusivity and improve monitoring, the group is currently discussing a proposal to expand the total size to 15 members. This adjustment will be incorporated in the group’s Terms of Reference, which are also currently undergoing a review process. Decisions on both matters are scheduled for approval at the next national MSG meeting in September.
- ➔ **[B.3.3\_2]** The National MSG is seen as qualified to oversee the implementation of the FiTI in Seychelles.
  - 1) **Government stakeholder group:** Currently, the group includes four members from the government: one representing the Department of Fisheries, one from the Blue Economy Department, and two from the National Assembly. In the revised ToR for the National MSG, it is being proposed that the group will include five representatives from Seychelles’ executive branch (i.e. from ministries, departments and authorities) and the two representatives from the legislative branch (i.e. from National Assembly), will become permanent observers.
  - 2) **Business stakeholder group:** This group includes two representatives for small-scale fisheries, one representative for large-scale fisheries, and one representative for fish processing. The group will eventually be expanded to included five representatives from the business sector.



- 3) *Civil society group*: This group includes representatives from three conservation CSO, Seychelles’ youth representative from the SMA as well as a representative from a CSO primarily unrelated to fisheries. The group will eventually be expanded to included five representatives from civil society.

While the National MSG is considered diverse enough to capture a wide range of stakeholder perspectives, evidence indicates that some members are not fully active or engaged. During this validation period, the National MSG met more than six times (2023-2024), with the following attendance rates shown for the meetings where minutes are available<sup>74</sup>. However, the meeting minutes for the calendar year 2022 and the first half of 2023 are unavailable due to changes in the national secretariat, a lack of proper handover, and data loss. The attendance list below exceeds the 12 members due to the attendance of alternates to the meetings. If the National MSG member as well as their alternate attended the meeting, then the alternate is reflected as an extra attendee in yellow below.



- ➡ **[B.3.3\_3]** This assessment found no evidence that the four civil society representatives in the Seychelles National MSG are operationally or politically dependent on the government or business interests.

<sup>74</sup> <https://mofbe.gov.sc/fiti/documents/>

- ➔ **[B.3.3\_4]** The National MSG was initially composed of 12 members, with plans to expand to 15 members in 2024 to address the composition requirements outlined in Corrective Action 1 and the monitoring of the performance National MSG. This proposed expansion will be discussed within the next National MSG, scheduled for August. This change will also be reflected in the 2023 reporting process. Information regarding the National MSG's composition, including member names and their alternates, along with the group's Terms of Reference and workplans, is publicly accessible on the MoFBE website.

**Direction of progress:**

Compared to the first validation timeframe, there has been notable improvements with regards to the multi-stakeholder oversight, in particular the recruitment of new representatives or the current review of the group's Terms of Reference. Still, while government, business, and civil society representatives are qualified and overall engaged, some members' engagement is inconsistent.

**Annual Workplan**

ID	Validation indicator	Scoring
<b>B.3.4_1</b>	The National MSG must provide an updated Workplan for each upcoming reporting period.	<b><i>Meaningful progress [2]</i></b>
<b>B.3.4_2</b>	Each Workplan must provide a summary of FiTI activities undertaken in the previous reporting period, including an assessment of the level of progress in achieving the objectives set out in the previous Workplan(s).	<b><i>Meaningful progress [2]</i></b>
<b>B.3.4_3</b>	Each Workplan must outline objectives, constraints, activities and outputs in accordance with requirement A.6. <sup>75</sup>	<b><i>Inadequate progress [1]</i></b>
<b>B.3.4_4</b>	Each Workplan must be approved by the National MSG two months prior to the upcoming reporting period.	<b><i>No progress [0]</i></b>
		<b><i><u>Inadequate progress</u></i></b> <i>[Avg. 1.25]</i>

<sup>75</sup> This includes information about uncompleted objectives of previous Workplan(s), if applicable; activities planned for the upcoming reporting period; recommendations identified by the National MSG in previous FiTI Report(s), if applicable; and recommendations from validations, if applicable.

**Detailed remarks:**

- ➔ **[B.3.4\_1]** The National MSG developed a work plan for 2022, but progress was limited due to limited availability of funds to implement the proposed activities. Unfortunately, further challenges were encountered with the transition from the previous FiTI National Secretariat, which affected the handover process. Currently, the National MSG is working on a new work plan<sup>76</sup>, with a meeting scheduled for September 2024 to advance this development.
  
- ➔ **[B.3.4\_2]** A summary of the activities are published on the MoFBE website, which contains the list of activities undertaken. The FiTI Standard encourages for workplans to reflect input from stakeholders outside of the National MSG. There is no evidence that such input has been collected for Seychelles' draft 2022 FiTI workplan.  
  
Furthermore, The FiTI Standard encourages National MSGs to consider more regular updates and revisions of its workplans, in order to be useful as a management tool. This has not been done by Seychelles' National MSG.
  
- ➔ **[B.3.4\_3]** The draft workplan for 2024-2025 is available on MoFBE's website. The draft includes a vision, mission, objectives with a linked activity table that includes detailed information such as timeframe, results, responsibility for implementation, and resources required.
  
- ➔ **[B.3.4\_4]** The workplan has not adhered to this timeframe and, as mentioned, is still in draft form.

**Direction of progress:**

Compared to the first validation timeframe, the provision of workplan remains inadequate and it is evident that the National MSG is currently not using this tool efficiently to plan its activities.

## Impact Report

In accordance with Section B.3.5 of the FiTI Standard, a National MSG is required to publish an Impact Report every three years, ideally timed to coincide with upcoming validations.

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<sup>76</sup> <https://mofbe.gov.sc/fiti/documents/>

Seychelles was due to release its first Impact Report in 2023, but this requirement has not been met.

## 6) Appraisal of progressive improvements

Progressive improvement is a key aspect of a country's FiTI implementation and subsequently also of its validation. The concept is anchored in FiTI Principle 7 which stipulates: *'Increasing transparency and participation must be feasible and introduced progressively in order to ensure the wide acceptance of this initiative.'* In other words, the FiTI does not expect all countries to have complete data for every transparency requirement from the beginning. Instead, public authorities must disclose the information they have, and where important gaps exist, they must demonstrate improvements over time. In accordance with the FiTI Standard, it is the responsibility of the National MSG to collectively agree on recommendations for addressing such gaps, and for the FiTI implementing country's government to follow up on these recommendations.<sup>77</sup>

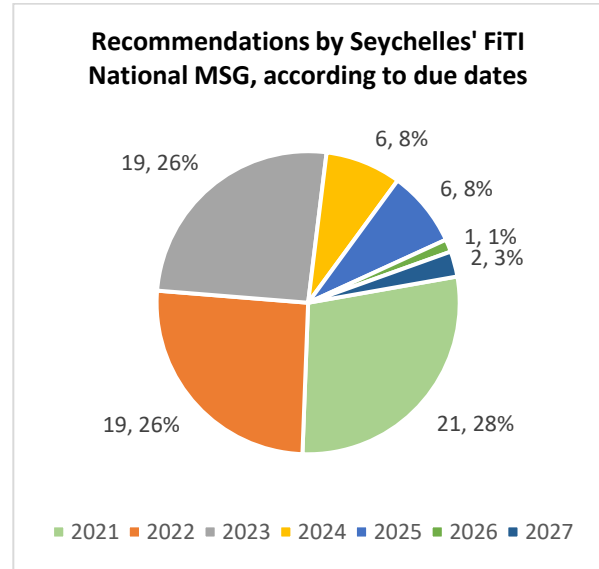
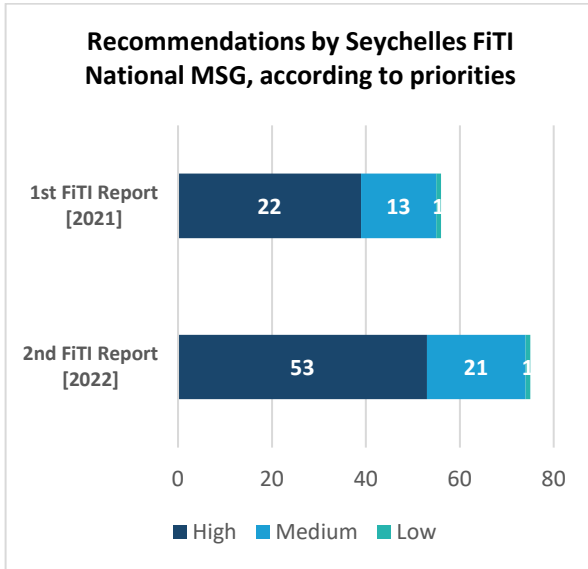
The principle of progressive improvement therefore has practical implications for the validation process, as a country can still initially achieve *'compliant'* status, even if some information required by the FiTI Standard is not available. This principle is relevant when determining a FiTI implementing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

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

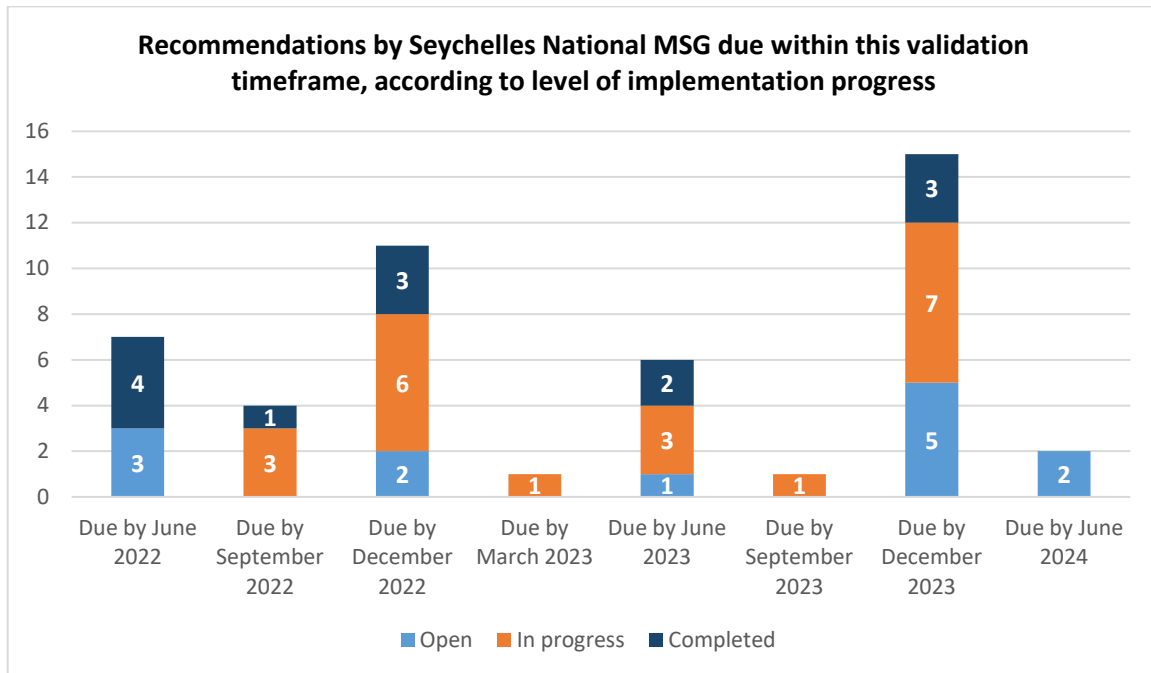
From the first to the fourth report, the country received a total of 69 recommendations. Of these, 32 have been implemented, while 2 have been cancelled because they were superseded by other recommendations or could not be completed within the given timeframe. 17 are currently in progress.

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<sup>77</sup> A government is not obliged to implement the recommendations of the country's National MSG. In case the government decides not to follow a recommendation, or to address it at a later point in time than proposed by the National MSG, the reasons for this need to be clearly stated.



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



Implementing the National MSG's recommendations into action has led to significant improvements in the availability and accessibility of government information in Seychelles, particularly:

- ➔ For *small-scale fisheries*, the Gender data is now recorded for registered artisanal fishers, boat owners, and divers in the publicly available artisanal license database;<sup>78</sup>
- ➔ All foreign *fishing access agreements* and related protocols have been made publicly available on the SFA website. The agreements negotiated with TTA and TFI in 2022, which have had their confidentiality clauses removed, are also published on the SFA website and will take effect in 2023;
- ➔ Launch of the Fisheries Information Management System (FIMS) in 2023, which offer data on licenses, the economic contribution of fisheries, annual catch volumes, exports and imports, and fisheries management regulations, including recorded catch data for *large-scale fisheries*.

Five recommendations were due in 2022, have not yet been implemented by Seychelles' national authorities are outlined in the country's 2022 FiTI Report (Annex D). This assessment found no indication that such a lack of implementation constitutes a breach of the principles of this initiative.

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<sup>78</sup> <https://sfa-fims.traseable.com/public/fisher-registration>



Fisheries  
Transparency  
Initiative

# Validation of the Republic of Seychelles

# Annex II

Validation Report of the  
Independent Validator  
(January 2022 – July 2024)



# REPORT OF THE INDEPENDENT VALIDATOR

## FiTI Seychelles (Jan 2022 July 2024)

Stefaan Depypere

27/12/2024



## ABBREVIATIONS

BAR	BASELINE ASSESSMENT REPORT
DOBE	DEPARTMENT OF THE BLUE ECONOMY
EEZ	EXCLUSIVE ECONOMIC ZONE
EU	EUROPEAN UNION
FIMS	FISHERIES INFORMATION MANAGEMENT SYSTEM
FITI	FISHERIES TRANSPARENCY INITIATIVE
IOTC	INDIAN OCEAN TUNA COMMISSION
MCS	MONITORING, CONTROL AND SURVEILLANCE
MESA	MINISTRY OF EMPLOYMENT AND SOCIAL AFFAIRS
MOFBE	MINISTRY OF FISHERIES AND THE BLUE ECONOMY
MSG	MULTI-STAKEHOLDER GROUP
NBS	NATIONAL BUREAU OF STATISTICS
ODA	OFFICIAL DEVELOPMENT ASSISTANCE
SCR	SEYCHELLOIS RUPEE
SFA	SEYCHELLES FISHERIES AUTHORITY <sup>1</sup>

## 1. EXECUTIVE SUMMARY

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

The provisions that must be applied when conducting validations are set forth in section D of the FiTI Standard.<sup>2</sup>

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

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<sup>1</sup> Previously named the Seychelles Fishing Authority (as per the Seychelles Fishing Authority (Establishment) Act 1984, which was repealed in July 2024 when the Seychelles Fisheries Authority Act (2024) was enacted).

<sup>2</sup> <https://fiti.global/fiti-standard>

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

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

For the Republic of Seychelles, the FiTI International Board initiated the country’s **first regular validation process** in line with the FiTI Standard (Section D.1) in September 2021, covering the period from April 2020 to December 2021. This timeframe included Seychelles' first and second FiTI Report for calendar years 2019 and 2020. The [FiTI International Board](#) recognised Seychelles’ efforts to implement the FiTI Standard with a score of ‘meaningful progress’, and issued four corrective actions for Seychelles to undertake which, if properly addressed, could see the country progress to the status of a FiTI Compliant Country. Since then, Seychelles has remained a FiTI Candidate Country.

In accordance with section D.4 of the FiTI Standard, the FiTI International Board has tasked the FiTI International Secretariat to launch the **second regular validation process** for Seychelles (Decision BM-25\_2024\_D-01). The timeframe for this validation was set from January 2022 until July 2024, covering Seychelles’ third FiTI Report (calendar year 2021) as well as its fourth FiTI Report (calendar year 2022).

As part of the first validation process step, the FiTI International Secretariat has documented its initial assessment of Seychelles’ compliance against the criteria of the FiTI Standard in this report. This assessment was primarily carried out via desk research, without the involvement of national or international stakeholders. It led to the production of a so-called baseline assessment report (further: BAR). A second step in the validation process was carried out by an independent validator from September to November 2024. The independent validator conducted a site visit to the Seychelles between 19 and 25 October 2024 to collect the stakeholder’s viewpoints on the findings of the BAR. This was complemented by further virtual meetings (Zoom or Teams) and by follow-up questions. The validation phase, as foreseen in the FiTI process, consisted of a series of interviews with critical stakeholders who were confronted, on the one hand with the conclusions of the FiTI report and the baseline assessment and, on the other hand with the transparency issues in general. Hence, the validation report reflects the perceptions and views expressed by relevant stakeholders. The general idea is to test the various assertions by asking parties concerned about their views. In this Socratic process each assertion is primarily tested with the party that might take a

different view. Hence a positive comment (e.g. there is full transparency) is offered to a party that may wish to challenge this (e.g. civil society or operators) and a negative comment (e.g. there is a lack of transparency) is offered to the authorities or the operators who should provide transparency, giving them a chance to explain the perceived lack of compliance. Moreover, parties are given a chance to make further suggestions about the desired level of transparency and further progress. This is done through interviews, preferably in situ, but also by conducting virtual meetings and by email exchanges. The validation process does not aim at replicating the work of the report compiler or the basic assessment report by the FiTI international secretariat.

Around 30 stakeholders <sup>3</sup> expressed opinions:

- 85 % of whom Seychellois interests, 15% international;
- 65 % representing some form of Government or Institution, 20 % Economic operators, 15 % Civil society or Press.

Generally speaking, the claims of the FiTI report as evaluated by the assessment in the baseline assessment were acknowledged. The Government services and FiTI received much acclaim with a variety of stakeholders, even if there are also a few instances for which transparency was considered to be work in progress. For that matter, this also transpires from the very thorough baseline assessment report.

It is fair to recognise that the Government has made Open Governance in general and Transparency in particular one of its major policy objectives and that, in the last couple of years, very good results have been achieved.

The country is now complying with basically all FiTI Standards, at times with some qualification about work being in progress. The further challenges are double.

Firstly, they lie at the level of translating available data into digestible information for all levels of society. That will require not only making information available but also pro-actively bringing the information to those who might or should really be interested. To some extent, this is bringing transparency to the next level<sup>4</sup>.

Secondly, they lie at the level of continuing to maintain the standard that is achieved until now. Transparency should be dynamically achieved, at all times and not just statically, i.e. when a FiTI report is made. The conversations with the stakeholders led us to believe:

- that the Seychelles have the mechanisms in place to maintain such dynamic transparency,

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<sup>3</sup> In certain cases, various people from a same stakeholder were expressing views (e.g. coming from various departments in the stakeholder organization). As validator, I did not request a consolidated agreed opinion from each stakeholder, I considered, in such cases, that the various opinions mattered.

<sup>4</sup> One could start a semantic discussion on what exactly is transparency: does it mean that data are available or does it also imply that data are processed into digestible information for the various interested parties.

- that the top level of Government is committed to this aim and
- that the operational levels of the administration are on the same page. The Government is tending towards developing the Fisheries Information Management System (FIMS) as a comprehensive information system.

Regarding FiTI itself in particular, the country is on a good sustainable track. The National MSG works well, meeting regularly and with committed participants. The reports have been made and have consistently been of a high quality.

The national FiTI lead is solidly anchored in the Ministry of Fisheries and the Blue Economy.

## KEY FINDINGS

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

The report compiler of the NMSG and the international FiTI secretariat in its assessment thereof concluded that Seychelles has maintained (or even enhanced) its levels of online transparency of fisheries management information in Seychelles while at the same time adopting new methods for disseminating information, improving online accessibility, consistently updating their websites with new information, and seeking to enhance stakeholder participation. The third and fourth FiTI reporting processes demonstrated that the government is making a substantial amount of this information freely accessible online. As independent validator, I can confirm these assessments. Recommendations to improve transparency have systematically been heeded and where some recommendations are still outstanding I encountered a great willingness to follow them up. Such instances include the outcome of stakeholder consultations related to fishing rights and the review of the Fisheries Act and information on social conditions and regulations in the ITZ.

The FiTI International Secretariat delivered an opinion that the government of Seychelles has shown its commitment to the FiTI principles and there are *no signs of wilfully withholding* information required by the FiTI Standard. When certain information has been unavailable, the competent national authorities offered to the National MSG transparent explanations, acknowledging issues such as administrative limitations, data corruption from ransomware attacks, and the destruction of physical records due to fungal damage.

As independent validator I can confirm that this assessment reflects reality. I found no stakeholder arguing any dissenting view on this. Nevertheless, certain stakeholders argue that the Government should aim higher than just making data available. They argue that the Government should also reach out to various parts of society and bring information on the fishing activity in a digestible manner. Roughly speaking, two target groups would be those working in the sector but finding it more difficult to access information by electronic means (artisanal fishermen and post-harvest workers -often women-, and workers in the supply

industry) as well as citizens not working in the fishing sector but interested to receive reliable information on it.

The Minister of Fisheries and the Blue Economy accepts these comments and has declared his willingness to further work into this direction. Whilst indicating that various efforts were already made (e.g. a dedicated workshop organised by civil society), he will look into further methods and events. These should include distributing critical information in simple info graphs, providing documentation in Creole and reaching out to the target groups through decentralised small events (bringing the conversation to the audience).

The fact that the Seychelles are a small island state carries both the advantage that the communication lines are short, direct and fairly cost efficient and the disadvantage that overall human (and financial) resources are limited. On the latter aspect, it is clear that the country lacks the economies of scale of large countries and administrations.

As independent validator, I make a recommendation to the board under point 5 of the present report.

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

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

The international secretariat of FiTI reported that the Seychelles has followed *the procedural requirements set out in section B.2.1 of the FiTI Standard* while producing its last two FiTI Reports and heeded the MSGs' previous decision to divide the information and findings into two sections: a summary highlighting the key findings and a detailed section that thoroughly assesses the public availability of information required by each of the FiTI Standard's 12 transparency requirements. The reports include references to where mentioned information, such as policy documents or vessel registries, can be accessed by the public. The National MSG also provided wide-ranging *recommendations for the government of Seychelles* on how to further enhance the public availability of accessible, complete, and up-to-date fisheries management information, with 12 recommendations made in the 2021 report and 8 in the 2022 report.

As per the FiTI Standard all 12 transparency requirements were duly covered in both FiTI Reports (2021 and 2022).

Both reports did comply with the *reporting deadline*<sup>5</sup>, that was slightly extended with the approval of the International Board to secure financing for the compiler. Both reports were submitted within the extended time frame.

Additionally, Seychelles' 2021 and 2022 FiTI Reports adhered to the *reporting process* outlined by the FiTI Standard. Both reports were compiled by an external Report Compiler (i.e. Mrs. Daniella Larue), whose appointment was approved by the Seychelles FiTI National MSG. Throughout the reporting processes, the Report Compiler engaged in numerous discussions with relevant stakeholders and was granted extensive access to fisheries information and data held by government entities, such as the SFA. She collaborated closely with the National MSG to draft the reports, submitting initial drafts for the group's review and feedback. The National MSG reviewed and formally approved both reports before they were published.

The FiTI National Lead, the FiTI National Secretariat as well as members of the National MSG also enhanced the *distribution of the reports* to key national stakeholders, e.g.:

- ➡ The 2022 FiTI Report was presented to President Wavel Ramkalawan and the Cabinet, as well as through various embassies by the Ministry of Foreign Affairs and Tourism;

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<sup>5</sup> According to section C.1.2 of the FiTI Standard, an implementing country may apply for an extension if it is unable to meet the required deadlines of FiTI implementation (i.e. publication of FiTI Report, Workplan, Impact Report, as well as undergoing validation) due to exceptional or unforeseen circumstances. The FiTI International Board will assess extension requests by the following criteria.

- A press conference attended by the FiTI National Lead, the FiTI National Secretariat and the Report Compiler, was held at the MoFBE in May 2024;
- Two media training workshops were conducted in May 2023 and July 2024 – in collaboration with the Danny Faure Foundation – which involved participation from various national media outlets and National MSG members;

The FiTI international secretariat assessed the reports in its Basic Assessment Report and the latter is validated in the present validation report. The independent validator is in a position to ascertain the validity of the abovementioned remarks and conclusions.

At the same time, the validator confirms the need to place a b-mol: there continues to be a *lack of public debate* around the management of the fisheries sector. Contributing factors include poor media coverage, a weak civil society landscape and a historic underappreciation of the importance of the country's fisheries sectors. While there is anecdotal evidence of stakeholder reactions to the information in the FiTI Reports, these reactions have been largely confined to small circles already engaged in the industry. Significant work remains for the Seychelles' national authorities as well as the National MSG to ensure that fisheries information (including from FiTI Reports) stimulates broader public discussions and inform public decision-making.

A notable example is that *SFA's FIMS*<sup>6</sup>, a significant effort to provide fisheries information in an easy-to-understand format, remains largely unknown by the general public or even other governmental bodies. Overall, it is acknowledged by the various stakeholders that the *corrective action* issued in the FiTI International Board's first Compliance Statement – relating to the impact of national FiTI implementations<sup>7</sup> – has not been fully met yet. However, a pilot project was launched - in collaboration with the FiTI International Secretariat and the non-profit organisation People Powered - to identify gaps and challenges within the National MSG and its processes, as well as identifying recommendations for a more inclusive policy-making environment in Seychelles' fisheries sector. The outcomes of this pilot project are expected by the end of 2024. Recent correspondence shows that the exercise is nearly completed.

This is, as already mentioned before, a challenge to bring transparency to a next level. As formulated by one of the stakeholders (from civil society), there is presently a high degree of transparency regarding data yet there remains a need to transform these data into understandable information. Depending on the targeted stakeholder, more processing of data

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<sup>6</sup> <https://sfa-fims.traseable.com/public>

<sup>7</sup> Correction action #3: *"In accordance with section B.2.4 of the FiTI Standard, Seychelles' FiTI National MSG must determine a formalised approach to ensure that the information published through the FiTI implementation process contributes to sustainable policy-making, effective oversight, accountability, and public debates."*



into information may be required.<sup>8</sup> The Government (c.q. the Minister) is aware of this challenge and fully committed to work on it. This includes analysing and explaining to the public at large what is the extent and the impact (positive and negative) of the fishery activity. What is its global value added and what are its effects. The Minister has a clear plan to collect the information (with what he calls “satellite accounts”). This would be a project where MoFBE and NBS would work together. As I understand, this would introduce a form of analytical accounting, in parallel to the existing accounting system. The technique requires some effort but is well known.

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

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

The government of Seychelles continues to provide and maintain an *enabling environment* for business and civil society participation. This is supported and guaranteed by the country’s constitution as well as relevant laws, regulations, and administrative rules. The FiTI International Secretariat has also not become aware of any notable cases where this regulatory framework was not put into practice with regarding the country’s FiTI implementation process.

Throughout the entire validation timeframe, the stability of the *FiTI Lead Ministry*, represented by the Department of Blue Economy (DOBE), and the active involvement and dedication of the *FiTI National Lead*, Mr Philippe Michaud, to advancing the process have been key factors for the continued implementation of the FiTI over the past two years. Attention ought to be paid, however to finding a deputy for the National Lead.

The Seychelles’ FiTI National MSG represents different stakeholder perspectives. Furthermore, and as a result of addressing the *corrective action* issued in the FiTI International Board’s first Compliance Statement – relating to the National MSG<sup>9</sup> – the overall group seems more engaged now, despite evidence that some members are still not fully engaged in the MSG’s activities (e.g. not attending or contributing to MSG meetings). This revitalised engagement is mainly due to the recruitment of new members of the National MSG as well as enhanced support by the National Secretariat (see below). New members were primarily

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<sup>8</sup> Let us observe, in passing that this process is delicate as such because transforming data into information necessarily implies a subjective phase of interpreting the data on behalf of the targeted stakeholder. So, if the concept is easy enough, the execution contains its pitfalls.

<sup>9</sup> Correction action #1: “Under section B.3.3 of the FiTI Standard, the FiTI Lead Ministry must maintain a National MSG to oversee the implementation of the FiTI with representatives from government, business and organised civil society, which is appropriately qualified and fully, actively, and effectively engaged in the FiTI.”

recruitment as previous members had reached their maximum term limits. Additional efforts are underway to further enhance the effectiveness of the *National MSG* by increasing member participation, reviewing the groups’ Terms of Reference, notably to include a role of a rotating Vice-Chair, and discussing the possibility of separating the role of the FiTI National Lead and the Chair of the National MSG. An important enhancement will be the upcoming inclusion of a representatives from the Ministry of Finance in the National MSG. Additional recruitment efforts for other relevant agencies, such as Seychelles’ Information Commission, to act as observers to the FiTI implementation process, are already under way.

Nevertheless, challenges with developing the annual workplans persist, leading to some confusion regarding ongoing and planned initiatives and priorities. The National MSG ought to give priority to annual work plans with time bound objectives to support them in the organisation of their activities. Furthermore, the government of Seychelles does not allocate a financial budget for the support of the National MSG and its outreach endeavours.

The role of the *FiTI National Secretariat* has been clarified and (at least partially) strengthened within this validation timeframe. As a result of addressing the corrective action issued in the FiTI International Board’s first Compliance Statement – relating to the National Secretariat<sup>10</sup> – the Secretariat is now hosted within the FiTI Lead Ministry (i.e. MoFBE, Blue Economy Department), whereas SFA is represented as a full member of the National MSG<sup>11</sup>. In addition, a staff person has been assigned by the MoFBE to act as the National Secretariat at the beginning of this validation timeframe. When the initial staff member experienced workload constraints a new dedicated staff person has been put on the job. Support provided by the National Secretariat to the National MSG has been seen as increasing over the last months (e.g. in the preparation of meetings as well as certain outreach activities). Apparently, the support is now stabilised. Nevertheless, this will need to remain a point of attention. The Secretariat should be given sufficient time and resources to perform the duties of a FiTI National Secretariat. The validator found that there is general praise for the national lead and the national secretariat. The challenge will be to maintain the support for the set-up, the success of which relies heavily on the personal commitment of both the national lead and the secretariat.<sup>12</sup> Admittedly, both are well supported by the Minister and the top of the MoFBE .

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

<sup>10</sup> Correction action #2: “As per section B.3.2 of the FiTI Standard, the FiTI Lead Ministry must ensure that administrative and operational support is provided to the National MSG – in the form of a dedicated FiTI National Secretariat.”

<sup>11</sup> This is being proposed as part of the revised ToR which is planned to be confirmed in the next meeting of the National MSG.

<sup>12</sup> Casu quo: Mr. Michaud and Ms. Morel.

## 2 - VERIFICATION OF THE ASSESSMENT OF INDIVIDUAL REQUIREMENTS

### B1 – ASSESSMENT OF INDIVIDUAL “TRANSPARANCY REQUIREMENTS”

#### B1.1 PUBLIC REGISTRY OF NATIONAL FISHERIES LAWS, REGULATIONS AND OFFICIAL POLICY DOCUMENTS

ID	Validation Indicator	Scoring BAR	Scoring Ind. Validator
B.1.1_1	The implementing country must provide an online, up-to-date registry of all national legislation and official policy documents related to the marine fisheries sector.	Compliant [3]	Compliant [3]
B.1.1_2	The National MSG must decide on which areas of fisheries this applies to; however, at a minimum, copies of national laws, decrees and policy documents on fisheries management, trade and investment, as well as fisheries management plans must be included.	Meaningful Progress [2]	Compliant [3]
		<b>Compliant [Avg. 2.5]</b>	<b>Compliant [Avg. 3.0]</b>

#### **Detailed comments independent validator:**

**[B.1.1\_1]** I confirm this qualification by the international secretariat. All relevant pieces of legislation and policy are accessible. The same goes for new legislation that is being enacted.

**[B.1.1\_2]** The assessment by the international secretariat in the BAR is correct but somewhat severe. Whilst the most relevant regulations and policies are actually covered, there is no documentation on the decision as such by the MSG. Obviously this constitutes a formal flaw but the effect on the practical availability of the information should not be exaggerated. As validator one is tempted to qualify the situation under this criterion as “compliant”. This would be conditional on the MSG formally deciding on the areas of fisheries this transparency requirement applies to. This ought to be done within an agreed timing, e.g. before end June 2025.

#### B1.2 FISHERIES TENURE ARRANGEMENTS

ID	Validation Indicator	Scoring BAR	Scoring Ind. Validator
B.1.2_1	The implementing country must publish a summary description of laws and decrees on fisheries tenure arrangements, including information as specified in requirement B.1.2 of the FITI Standard.	Compliant [3]	Compliant [3]

<b>B.1.2_2</b>	In case tenure, access or user rights are not codified, information on the current and planned approaches to securing such rights must be published.	Not applicable	Not applicable
		<b>Compliant [Avg. 3.0]</b>	<b>Compliant [Avg. 3.0]</b>

**Detailed comments independent validator:**

**[B.1.2\_1]** The SFA duly publishes on its website all relevant information and summary descriptions of the four main fisheries. Previous recommendations by the MSG to improve transparency have been heeded. This includes an alleged opacity in the sea cucumber fishery. It is encouraging that recommendations are duly followed up.

**[B.1.2\_2]** Properly arranged within the general legal set-up.

One challenge remains however, namely to update the information regularly and to increase the structure of the SFA website. The so-called FIMS part of the website is apparently more up to date. Yet as information appears twice on various sections of the site, there is potential confusion and as such, some regression of effective transparency. This should be a point of attention for the SFA. In conversations, the SFA acknowledged that the site is “work in progress”. It has defined a work programme with three phases of progress for FIMS. At the end of Phase 3 FIMS should contain all information. The SFA confirmed that it is on track with its FIMS development. A recurrent comment by various stakeholders is that the structure of the website should be improved. This message has been taken on board.

### B1.3 FOREIGN FISHING ACCESS AGREEMENTS

<b>ID</b>	<b>Validation Indicator</b>	<b>Scoring BAR</b>	<b>Scoring Ind. Validator</b>
<b>B.1.3_1</b>	The implementing country must publish the contracts of all foreign fishing access agreements, including their associated protocol(s).	Compliant [3]	Compliant [3]
<b>B.1.3_2</b>	The implementing country must publish studies or reports undertaken by national authorities or foreign parties to an agreement providing evaluation or oversight of the agreement, if available.	Compliant [3]	Compliant [3]
<b>B.1.3_3</b>	The implementing country must publish documentation derived from any national stakeholder consultation undertaken with respect to the preparation, negotiation or monitoring of the agreements, if available.	Inadequate progress [1]	Inadequate progress [1]
		<b>Meaningful Progress [Avg. 2.3]</b>	<b>Meaningful Progress [Avg. 2.3]</b>

**Detailed comments independent validator:**

**[B.1.3\_1]** As far as we can judge all fishing agreements are now published, including those that were previously unavailable because of confidentiality clauses (with Taiwanese parties) and one (with a South Korean party)

that was previously not taking the form of a formal agreement. All agreements are now accessible on the SFA website. No stakeholder questioned this.

**[B.1.3\_2]** The evaluation reports that were made in 2020 are available. A new evaluation is under way and is about to be finalised but has not been published yet. I understand the Ministry intends to publish the outcome as soon as it is available. Apart from that, the Minister is also keen to develop new analysis, including but not limited to the fishery agreements, of the significance and effects of the fishing activity in general.

**[B.1.3\_3]** Stakeholders are progressively being involved in fishery policy matters. For example, on the new fishery bill, extensive consultations have taken place. On fishery agreements, this apparently has not been done yet. Of course, such negotiations take place only irregularly. There is hope that for the upcoming negotiations (c.q. with the EU) a more transparent process of publication of the evaluation report and the ensuing consultation might be followed. The MOFBE argued that several consultations have also taken place without being noticed.

The direction of progress is certainly positive both in terms of effective transparency and in terms of declared intention for the future. The expected area of improvement lies in the public ex ante consultation on renewing agreements. If consultations have taken place without being noticed, then this pleads for increasing transparency around them. This should be low hanging fruit.

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**B1.4 STATE OF FISHERIES RESOURCES**

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

**Detailed comments independent validator:**

**[B.1.4\_1]** All stock assessments reports are duly published. No instances are reported where published information could or ought to be improved.

**[B.1.4\_2]** All methods are published.

**[B.1.4\_3]** the work programme is duly published

Some interlocutors and the FiTI reporters mentioned that the SFA ought to publish a comprehensive report on the overall status of the fish stocks in the Seychelles and ought to publish a summary information on the health

of the fishery resources. We understand that the SFA is willing to make such reports but is mainly hindered by resources issues (c.q. high staff turnover). As already mentioned before, this problem is somewhat endemic in the Seychelles given the small size of the country and the ensuing pressure on the pool of human resources. This being said, the SFA indicated that a draft report has been produced and is currently being reviewed. It states that the final report will be circulated early 2025.

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## B1.5 LARGE-SCALE FISHERIES

ID	Validation Indicator	Scoring BAR	Scoring Ind. Validator
<b>B.1.5_1</b>	The implementing country must provide an online, up-to-date registry of all nationally flagged and foreign-flagged large-scale vessels authorised to fish in the country's marine jurisdictional waters, and of all nationally-flagged large-scale vessels authorised to fish in third countries' marine jurisdictional waters and on the High Seas, including information on 14 attributes, as listed in section B.1.5 of the FITI Standard.	Compliant [3]	Compliant [3]
<b>B.1.5_2</b>	The implementing country must publish accessible and complete information on payments made by each vessel listed in the vessel registry for their fishing activities, including information on 4 attributes, as listed in section B.1.5 of the FITI Standard <sup>13</sup> .	Compliant [3]	Compliant [3]
<b>B.1.5_3</b>	The implementing country must publish information on the quantity of annual recorded retained catches by nationally flagged vessels listed in the vessel registry, including according to species or species groups, disaggregated by fishing authorisations or gear type as well as marine jurisdictional waters, High Seas and third country waters.	Compliant [3]	Compliant [3]
<b>B.1.5_4</b>	The implementing country must publish information on the quantity of annual recorded retained catches by foreign-flagged vessels listed in the vessel registry according to species or species groups, disaggregated by fishing authorisations or gear type, presented for each flag State separately.	Compliant [3]	Compliant [3]
<b>B.1.5_5</b>	The implementing country must publish information on the quantity of annual recorded landings in national ports according to species or species groups caught in the country's marine	Meaningful progress [2]	Meaningful progress [2]

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<sup>13</sup> Information on payments to port authorities must be separated from payments for fishing activities.

	jurisdictional waters, disaggregated by fishing authorisations or gear types, presented for each flag State separately.		
<b>B.1.5_6</b>	The implementing country must publish information on the quantity of annual recorded transshipments at sea or landings in foreign ports according to species or species groups caught in the country's marine jurisdictional waters, disaggregated by fishing authorisations or gear types, presented for each flag State separately.	Meaningful progress [2]	Meaningful progress [2]
<b>B.1.5_7</b>	The implementing country must publish information on recorded quantities of discards according to species or species groups, disaggregated by fishing authorisations or gear types, presented for each flag State separately, if available <sup>14</sup> .	Meaningful progress [2]	Meaningful progress [2]
<b>B.1.5_8</b>	The implementing country must publish the most recent studies and reports on recorded fishing effort by vessels, disaggregated by fishery or gear type and by flag State, if available.	Meaningful progress [2]	Meaningful progress [2] (Bordering compliant)
<b>B.1.5_9</b>	The implementing country must publish evaluations or audits of the economic, social and food security contribution of the large-scale fishing sector, if available.	Not collated	Not collated
		Compliant <b>[Avg. 2.5]</b>	Compliant <b>[Avg. 2.5]</b>

**Detailed comments independent validator:**

**[B.1.5\_1]** All information is duly published and documented. The new FIMS shows its usefulness in this context.

**[B.1.5\_2]** Information made available. Digitisation efforts show their usefulness.

**[B.1.5\_3]** Complete data are available. No disagreement with this qualification by any interviewed stakeholder.

**[B.1.5\_4]** Complete data are available. No disagreement with this qualification by any interviewed stakeholder.

**[B.1.5\_5]** Data are basically all available except for disaggregating catches in SEY waters from those in high seas. This difficulty is related to separating catches stored in shared wells. A priori, there seems little the SFA can do about this storage method. This being said, it ought to be possible, e.g. by imposing an Electronic Registration System of catches to register catches per catching area. Combining this ERS with a reinforced Control effort ought to increase the quality of the data. Another point however relates to landings and transshipment in the longline fishery. Basically, these data are available at the MCS division of the SFA. Work is being done on the software to remedy this shortcoming. In short, in both domains, further progress should be possible. As validator, I would invite the SFA to work out a time bound roadmap for improving the quality of the data. The MSG could add this to its workplan. The SFA confirmed that this is "work in progress" and that work is being done on the software. It reminded that the ERS will provide the same information as currently reported in the logbook and that the

<sup>14</sup> This must include information on how information on discards is gathered by national authorities.

data from the wells will still be estimated catch from the skipper. Notwithstanding this comment, which is absolutely correct, we must expect that an ERS greatly improves the reliability of the logbook and opens a lot of options for the MCS division to gain a better control.

**[B.1.5\_6]** These data are only partially available, due to software issues. New software is being installed, which should remedy this shortcoming. The latest information is encouraging, both for Purse Sein and Industrial Longline the SFA is close to target. Also, here, one must expect the quality of the MCS to increase considerably once the better software is available. It recommendable to pursue a time bound objective.

**[B.1.5\_7]** Considerable progress has been made on discard reporting. What is still lacking is a disaggregation by species and flag state. Yet progress in this area is more than meaningful. The SFA confirms that the publication of data for 2024 is imminent. Admittedly, the full standard is yet to be reached. Same comment as above, a time bound objective ought to be agreed upon.

**[B.1.5\_8]** Data is published on line and is considered by interviewed stakeholders as being complete. Even if data is collected and archived per vessel, it is published per flag state. One can argue about the qualification (meaningful progress or compliant). The SFA argues that data by vessel is considered confidential.

**[B.1.5\_9]** The economic contribution by large scale fisheries is only partially documented. However, both the NBS and the MFBE are interested and willing to cooperate and advance in this domain. One can expect that progress will be achieved and that the results will be transparently communicated.

All in all, transparency is high in this area. Some further improvements are still possible and we must expect them to be achieved in the future. This should be possible with the new software that has been installed. Also, the willingness of the various administrations (NBS and MoFBE) to cooperate bodes well.

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**B1.6 SMALL-SCALE FISHERIES**

<b>ID</b>	<b>Validation Indicator</b>	<b>Scoring BAR</b>	<b>Scoring Ind. Validator</b>
<b>B.1.6_1</b>	The implementing country must publish information on the total numbers of small-scale fishing vessels, disaggregated according to categories of fishing or gear types.	Compliant [3]	Compliant [3]
<b>B.1.6_2</b>	The implementing country must publish information on the total number of fishing licenses issued to small-scale fishing vessels, disaggregated according to categories of fishing authorisations.	Compliant [3]	Compliant [3]
<b>B.1.6_3</b>	The implementing country must publish information on the total numbers of fishers engaged in the fishing sector, indicating the gender of fishers and the proportion that are engaged in full-time work, seasonal or part time fishing, occasional fishing or recreational fishing.	Meaningful progress [2]	Meaningful progress [2]



<b>B.1.6_4</b>	The implementing country must publish information on the total payments made from small-scale fisheries related to fishing authorisations, catches and landings, disaggregated according to categories of fishing authorisations or gear types and indicating the recipient of these payments.	Compliant [3]	Compliant [3]
<b>B.1.6_5</b>	The implementing country must publish information on the quantity of catches, disaggregated according to species, categories of fishing authorisations and gear types.	Inadequate progress [1]	Inadequate progress [1]
<b>B.1.6_6</b>	The implementing country must publish information on the total volumes of discards, disaggregated according to species, categories of fishing authorisations and gear types.	Not applicable	Not applicable
<b>B.1.6_7</b>	The implementing country must publish evaluations or audits of the economic, social and food security contribution of the small-scale fisheries sector, if available.	Meaningful progress [2]	Compliant [3]
		<b>Meaningful progress [Avg.2.3]</b>	<b>Compliant [Avg.2.5]</b>

**Detailed comments independent validator:**

**[B.1.6\_1]** Information published annually in the Fisheries Statistical report. The SFA also makes available a downloadable spreadsheet. Transparency is systematically improving with occasional delays linked to upgrading of data processing systems. The statistical report for 2023 is now completed and the National Lead confirmed that it will be uploaded on the website soon.

**[B.1.6\_2]** SFA publishes data over and above those required by the Fisheries Act (but in line with MSG recommendations).

**[B.1.6\_3]** Data on small scale fishers used to be collected but not published. Now it is also published including gender and type of fishing. Data on occasional or part time fishers is not collected and only data on registered fishers is collected without capturing the full time, part time or occasional status. This is however covered in a separate Study offering a clearer picture of full time and part time fishers. Difficult to adequately qualify the situation. Progress is certainly meaningful and one can argue that there is almost compliance.

**[B.1.6\_4]** On this standard, and as part of the FiTI reporting process, the SFA went **further** than the FiTI standard requirement and made available detailed payment data to the MSG.

**[B.1.6\_5]** The Government has been working to enhance transparency and completeness in fisheries data reporting (now also including sea cucumber and lobster). The MSG identified gaps in the artisanal fishery data. The SFA has addressed the problem and is progressing -the information is published in its statistical report- but there remain challenges to achieve timely and detailed reporting for the artisanal fishery.

**[B.1.6\_6]** In the artisanal fishery, there are basically no discards. Unsold fish is used as bait or for personal consumption.

**[B.1.6\_7]** The SFA has published on its website three studies on the socio-economic contributions of the small-scale long line fleet, the sea cucumber fishery and the sport and recreational fishery, thus implementing a previous FiTI recommendation. Whereas the FiTI International secretariat qualifies this a meaningful progress, as independent validator, I would tend to use the “compliant” qualification: the studies have been published and the previous recommendation has thus been implemented. This would tilt the aggregate qualification towards compliant with an average of 2.5.

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## B1.7 POST-HARVEST SECTOR AND FISH TRADE

ID	Validation Indicator	Scoring BAR	Scoring Ind. Validator
<b>B.1.7_1</b>	The implementing country must publish information on the total quantity of fish and fish products produced, disaggregated by species and fish products.	Inadequate progress [1]	Inadequate progress [1]
<b>B.1.7_2</b>	The implementing country must publish information on the total quantity of imports of fish and fish products, disaggregated by species and fish products, indicating the country of their origin.	Meaningful progress [2]	Meaningful progress [2]
<b>B.1.7_3</b>	The implementing country must publish information on the total quantities of exports of fish and fish products, disaggregated by species and fish products, indicating the country of their destination.	Inadequate progress [1]	Inadequate progress [1]
<b>B.1.7_4</b>	The implementing country must publish information on the total number of people employed in commercial fisheries sectors, including the number of men and women working in specific sub-sectors.	Meaningful progress [2]	Meaningful progress [2]
<b>B.1.7_5</b>	The implementing country must publish information on the total number of people employed in informal fisheries sectors, including the number of men and women working in specific sub-sectors.	Not collated	Not collated
<b>B.1.7_6</b>	The implementing country must publish reports or studies on wages in the post-harvest sector, if available.	Meaningful progress [2]	Meaningful progress [2]
		<b>Meaningful progress [Avg. 1.6]</b>	<b>Meaningful progress [Avg. 1.6]</b>

### **Detailed comments independent validator:**

**[B.1.7\_1]** There is progress but only slow progress and there remain challenges in achieving complete data coverage for artisanal fisheries. Catch data is limited to the small-scale industrial fishery. With the progressive improvement of the data system at SFA, further progress is expected but as yet, this is not adequate according

to the standard. The SFA argues that there is currently no platform to capture the totality of this information. As regards exports the information is captured by the competent authority issuing the health certificates for exports. Additionally, the SFA can request the same information from Customs. Yet, for the totality of the information, the SFA argues that it lacks the manpower.

**[B.1.7\_2]** Basically the data are published but partly in the NBS statistical bulletin and partly by the SFA. Improved cooperation between both services should allow a better transparent information. The SFA further mentions that the data are available at the Trade and Customs division.

**[B.1.7\_3]** This is another instance where better coordination between the NBS and the SFA could move things forward relatively easily. Disaggregation of exports at species level is not included in the SFA reports, even if it is collected by NBS. As validator, in my conversation with both NBS and SFA I found no intent to withhold information and -to the contrary- much willingness to increase the cooperation. I expect that this can easily be solved. However, I suggest that actual progress be planned within a foreseeable horizon, e.g. until the end of Q2 2025. The SFA nevertheless advances the same point as under B.1.7\_1. I suggest that the MSG checks what is doable.

**[B.1.7\_4]** Data on employment in the post-harvest sector constitute another domain where progress is made and more progress is possible and achievable. Meaningful progress is made on data related to the ITZ, which is encouraging. The data, published for 2022 but achieving this on a regular basis will remain an objective to be pursued. Here as well, a time bound plan ought to be laid down.

**[B.1.7\_5]** Collating data on employment in the informal sector is -by its very nature- not an easy task. A study was made and published on the SFA website. Whilst insightful, it needs to be completed with additional employment categories. As reported elsewhere in this validation report, the Minister and his services have the ambition to work on developing the understanding of the various fish activity related sectors. It is advisable to include this in the formal work plan with timebound progress objectives. The SFA confirms that this is work in progress.

**[B.1.7\_6]** There are various studies and data sources, available at both the NBS and the SFA. However, the NBS study aggregates fishery and agriculture data. A previous comment on the cooperation between NBS and SFA is valid also here.

For this transparency requirement there is some progress but more could be achieved through better coordination of the various services. We have reason to believe that this is achievable. At least, the various services involved (c.q. SFA and NBS) are declaring their ambition to work together more closely. A cooperation roadmap with time bound objectives ought to be laid down.

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**B1.8 FISHERIES LAW ENFORCEMENT**

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<b>ID</b>	<b>Validation Indicator</b>	<b>Scoring BAR</b>	<b>Scoring Ind. Validator</b>
<b>B.1.8_1</b>	The implementing country must publish information on the national activities and strategies used for ensuring compliance of fishing vessels and the post-harvest sector with national legislation.	Inadequate progress [1]	Meaningful progress [2]
<b>B.1.8_2</b>	The implementing country must publish information on the financial and human	Inadequate progress [1]	Inadequate progress [1]

	resources deployed by the government to ensure compliance with national legislation.		
<b>B.1.8_3</b>	The implementing country must publish information on the total numbers of inspections of fishing vessels at sea and in ports.	Compliant [3]	Compliant [3]
<b>B.1.8_4</b>	The implementing country must publish a record of convictions for major offences in the fisheries sector for the last five years, indicating the name of the company or vessel owner, the nature of the offence and the penalty imposed.	Meaningful progress [2]	Meaningful progress [2]
		<b>Meaningful progress [Avg. 1.7]</b>	<b>Meaningful progress [Avg. 2]</b>

**Detailed comments independent validator:**

**[B.1.8\_1]** The MSG noted that while there are activities to monitor certain aspects of the post-harvest sector such as inspections and verifications, there is no overall strategy to guide these activities. This observation was confirmed in the BAR. The SFA, and its MCS division in particular, acknowledges this but defends itself by arguing that there is a strategy included in each management plan (of each fishery). These could be consolidated at a later stage. The general guidance regarding the various strategies consists of a deployment of resources based on risk assessment. As validator, I like to think that the MCS division is just one step away from compliance and has thus made meaningful progress towards getting there. Hence, I suggest to slightly improve the qualification.

However, this ought to be done within an agreed time frame. There is progress in the sense that everything is ready to move forward. Yet it actually needs to be done.

**[B.1.8\_2]** There is no consolidated information on the human and financial resources deployed by all relevant authorities. On the deployment in the SFA itself, there is partial information viz. on the budget of the MCS division. The complexity of collating information across ministries and agencies is recognised and no wilful withholding is assumed. The SFA argues that it started conversations with other instances such as the coast guard to gather information. As validator, I would argue that even if there is some progress or at least an intention to move ahead, the qualification given in the BAR is appropriate. The progress is inadequate and arguably it would be beneficial for the country to have a clear view on the consolidated deployment of resources and on the benefit of investing more in MCS, in terms of conservation and even purely financially, in terms of fines collected.

**[B.1.8\_3]** Information on the total number of inspections at sea and in ports is available and published by the SFA.

**[B.1.8\_4]** The SFA has published a record of convictions for major offenses and a list of foreign vessels apprehended for IUU fishing. The list contains some detail but no information on vessel owners or dates of incidents. The MCS division also maintains a list of foreign vessels caught for IUU fishing. This partially fulfils the recommendation by the MSG and confronted with this observation the SFA argues that it can improve on this transparency criterion but that beneficial owner information is not available. It refers back to the Ministry. Another issue relates to administrative fines. These smaller fines are efficient to correct infractions rapidly. Even if they cover minor infractions, this is not necessarily insignificant. It is probably useful to increase transparency on this e.g. by publishing aggregated data, if only to show to the operators and to the public that also minor infractions are subject to fining.

Given the importance of transparency on offenses in terms of dissuasion of perpetrators and a sentiment of applied justice with other operators and stakeholders in general, it seems appropriate to insist on further efforts. There exists some progress but more should be aimed at.

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#### B1.9 LABOUR STANDARDS

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ID	Validation Indicator	Scoring BAR	Scoring Ind. Validator
<b>B.1.9_1</b>	The implementing country must publish a summary description of national laws on labour standards applicable for national and foreign workers employed in the fishing sector at sea and in the post-harvest fisheries sector.	Meaningful progress [2]	Meaningful progress [2]
<b>B.1.9_2</b>	The implementing country must publish information on the public authorities responsible for monitoring and enforcing laws on labour standards.	Compliant [3]	Compliant [3]
<b>B.1.9_3</b>	The implementing country must publish documents, including policy statements and evaluations, regarding a national strategy, if applicable, or related activities for enforcing the laws on labour standards in the fisheries sector, including total figures on the financial and human resources deployed by the government.	Compliant [3]	Compliant [3]
<b>B.1.9_4</b>	The implementing country must publish information on the role and legal standing of anybody that has a governmental mandate to receive labour-related complaints from workers in the fishing sector and in the post-harvest sector.	Compliant [3]	Compliant [3]
<b>B.1.9_5</b>	The implementing country must publish the total number of offences committed by employers in the fisheries sector that have been resolved by the authorities.	Compliant [3]	Compliant [3]
		<b>Compliant [2.8]</b>	<b>Compliant [2.8]</b>

#### Detailed comments independent validator:

**[B.1.9\_1]** Documentation is published on the website of the Employment Department but ought to extend also to the workers in the ITZ. This is another case where inter-ministerial cooperation could be enhanced. The Minister of Fisheries and the Blue Economy has accepted to reach out to his colleague in the Employment department. The most recent follow up shows that the Minister has effectively started conversations with both MESA and the Financial Services Authority. This bodes well. Until the conversation leads to an effective result, it is appropriate to maintain the “progress” qualification.

**[B.1.9\_2]** The Ministry of Employment and Social Affairs takes responsibility for monitoring and enforcing labour standards in all sectors, including fisheries. This is published on the MESA website. This ought to be mentioned on the SFA and MoFBE websites.

[B.1.9\_3] This is done. Qualification not questioned by any stakeholder. One b-mol though as regular updates would be needed.

[B.1.9\_4] Same as above. Qualification not questioned.

[B.1.9\_5] Qualification not questioned.

The extra effort of cooperation with the Ministry for Employment and cross-referencing of website is needed to obtain a clean sheet on this criterion but the validator agrees with the qualifications in the BAR.

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#### B1.10 FISHERIES SUBSIDIES

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ID	Validation Indicator	Scoring BAR	Scoring Ind. Validator
B.1.10_1	The government must publish information on the type, values and recipients of government financial transfers or subsidies to the fisheries sector.	Meaningful progress [2]	Meaningful progress [2]
B.1.10_2	The government must publish information on the average annual value of any fuel subsidies per unit of fuel in nominal and percentage terms.	Compliant [3]	Compliant [3]
		<b>Compliant<sup>15</sup> [Avg. 2.5]</b>	<b>Compliant [Avg. 2.5]</b>

#### **Detailed comments independent validator:**

[B.1.10\_1] The MoFBE confirms that there are no subsidies for large scale fisheries vessels. All vessels (fisheries or others) purchase fuel at the same price. For small-scale fisheries the scheme is available on the SFA website

[B.1.10\_2] Information on the fuel incentive scheme for small-scale is available on line on the SFA website.

The direction of progress is positive, with increased information on the existence (or absence) of schemes.

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#### B1.11 OFFICIAL DEVELOPMENT ASSISTANCE (CAN REPRESENT AN IMPORTANT SOURCE OF FUNDS AND SUPPORT)

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ID	Validation Indicator	Scoring BAR	Scoring Ind. Validator
B.1.11_1	The government must publish information on public sector projects related to fisheries and marine conservation, funded by bilateral, multilateral and private donors, including information on the projects' value, purpose and outputs.	Meaningful progress [2]	Meaningful progress [2]
B.1.11_2	The government must publish corresponding project evaluations, if applicable.	Compliant [3]	Compliant [3]
		<b>Compliant [2.5]</b>	<b>Compliant [2.5]</b>

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<sup>15</sup> The BAR mentions “meaningful progress” but this was a typo, given the quantitative score

**Detailed comments independent validator:**

**[B.1.11\_1]** The SFA has now published an online database of fisheries related projects funded through ODA. Additionally, a list of projects has been provided in the FiTI reports. However, a central repository is still missing.

The SFA argues that it has duly published an excel table on all fishery related projects on its website. It considers that a central repository of marine and fisheries related projects should be executed by a main line Government Institution. Admittedly, it has a point.

**[B.1.11\_2]** A mid-term evaluation of a WB project was done and is published. No other projects have been covered.

Even if the Government is providing the information to the MSG in the FiTI process, it does not endeavour to make this information available on line (e.g. through FIMS). A priori, there seems to be no good reason for the Government to hide this information.

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**B1.12 BENEFICIAL OWNERSHIP**

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

**Detailed comments independent validator:**

**[B.1.12\_1]** Legal basis are the Beneficial Ownership Act (2020) and ensuing regulations Qualification not questioned.

**[B.1.12\_2]** Qualification not questioned.

**[B.1.12\_3]** Qualification not questioned

**[B.1.12\_4]** Qualification not questioned. This being said, it would be advisable to reinforce legislation or regulations in this area. The new fisheries legislation (now a bill, being enacted) might offer a good occasion. The problem is the lack of enforcement mechanisms to obtain beneficial ownership information. This is especially

relevant for industrial vessels and for foreign owned vessels in particular. Whether best to enforce this through the new fisheries act or through provisions in access agreements, is a matter for the MoFBE to decide.

**[B.1.12\_5]** Qualification not questioned. Yet same remark as above.

## B2 - ASSESSMENT OF INDIVIDUAL “PROCEDURAL REQUIREMENTS” FOR FITI REPORTS

### B2.1 REPORTING REQUIREMENTS

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

#### **Detailed comments independent validator:**

The various stakeholders could not really comment on the successive sub-standards.

**[B.2.1\_1 to 5]** No comments were made.

### B2.2. REPORTING DEADLINES AND PERIODS

ID	Validation Indicator	Scoring BAR	Scoring Ind. Validator
<b>B.2.2_1</b>	The country’s 1 <sup>st</sup> FiTI Report must be published within the subsequent year of becoming a FiTI Candidate country.	Not applicable	Not applicable
<b>B.2.2_2</b>	The country’s 1 <sup>st</sup> FiTI Report must contain information on transparency requirements 1 – 6, set forth in section B.1 of the FiTI Standard.	Not applicable	Not applicable



<b>B.2.2_3</b>	The country's 1 <sup>st</sup> FiTI Report must contain information from the complete calendar year when the country became a FiTI Candidate country.	Not applicable	Not applicable
<b>B.2.2_4</b>	Following the 1 <sup>st</sup> FiTI Report, subsequent FiTI Reports must be published on an annual basis, comprising information from the complete calendar year preceding the year addressed in the last FiTI Report.	Meaningful progress [2]	Meaningful progress [2]
<b>B.2.2_5</b>	Every second FiTI Report must include information on transparency requirements 7 – 12 set forth in section B.1 of the FiTI Standard, and this information must be disaggregated by calendar years.	Compliant [3]	Compliant [3]
		<b>Compliant [Avg. 2.5]</b>	<b>Compliant [Avg. 2.5]</b>

**Detailed comments independent validator:**

[B.2.2\_1 to 5] FiTI reports were published with delay. However, the delays were approved by the International Board. Stakeholders made no comments.

**B2.3 REPORTING PROCESS**

<b>ID</b>	<b>Validation Indicator</b>	<b>Scoring BAR</b>	<b>Scoring Ind. Validator</b>
<b>B.2.3_1</b>	The country's FiTI Reports must be compiled by an independent, credible, trustworthy and technically competent Report Compiler.	Compliant [3]	Compliant [3]
<b>B.2.3_2</b>	The engagement of the country's Report Compilers must be based on Terms of Reference, which must include minimum procedures for FiTI Reports, as endorsed by the FiTI International Board <sup>16</sup> .	Compliant [3]	Compliant [3]
<b>B.2.3_3</b>	The appointment of the country's Report Compiler must be endorsed by the National MSG.	Compliant [3]	Compliant [3]
<b>B.2.3_4</b>	The National MSG and the Report Compiler must work jointly to ensure that the entire FiTI reporting process is perceived as open and inclusive.	Compliant [3]	Compliant [3]
<b>B.2.3_5</b>	The Report Compiler must consult with relevant national and international organisations to ensure that the assessment on the transparency requirements is perceived as credible	Compliant [3]	Compliant [3]

<sup>16</sup> The FiTI Standard states that ToRs may be adapted to include additional transparency requirements beyond those established in the FiTI Standard, if this is agreed upon by the National MSG.

	and trustworthy, and that all appropriate sources of information are considered.		
<b>B.2.3_6</b>	The Report Compiler must seek to resolve the discrepancies between published government information and information from other stakeholders, if applicable <sup>17</sup> .	Compliant [3]	Compliant [3]
<b>B.2.3_7</b>	The Report Compiler must consolidate the findings in a preliminary FiTI Report and submit it to the National MSG for review.	Compliant [3]	Compliant [3]
<b>B.2.3_8</b>	The National MSG must review the preliminary findings of the Report Compiler and provide comments <sup>18</sup> .	Compliant [3]	Compliant [3]
<b>B.2.3_9</b>	The National MSG must formally approve the FiTI Reports and publish them afterwards.	Meaningful Progress [2]	Meaningful Progress [2]
<b>B.2.3_10</b>	The National MSG must consult with the FiTI International Secretariat prior to publishing its first FiTI Report to review completeness against the FiTI reporting requirements.	Compliant [3]	Compliant [3]
		<b>Compliant [Avg. 2.8]</b>	<b>Compliant [Avg. 2.8]</b>

**Detailed comments independent validator:**

**[B.2.3\_1]** There is general recognition by all stakeholders that the FiTI report, prepared by Ms Daniela Larue, is a high-quality document, compiled by a credible, trustworthy and technically competent expert. It accurately reflects the present situation and also contains the necessary recommendations for future action. Ms Larue is not and was not a member of the MSG. All stakeholders were “*unisono*” in acclaiming the work of the report compiler.

**[B.2.3\_2 - 10]** No detailed comments were made. On Criterion 5 it is worth mentioning that the report compiler consulted with a wide array of government and non-government departments in the domains of finance, communications, port management, employment and workers representation. On Criterion 9, the b-mol observed in the BAR relates to the absence of a formal documentation of the approval in the meeting minutes of the MSG. The reports were approved but the minutes do not mention this. Members of the MSG presume a secretarial oversight.

**B2.4 REPORTING DISSEMINATION AND PUBLIC DEBATE**

<b>ID</b>	<b>Validation Indicator</b>	<b>Scoring BAR</b>	<b>Scoring Ind. Validator</b>
<b>B.2.4_1</b>	FiTI Reports must be comprehensible and written in a clear and accessible style.	Compliant [3]	Compliant [3]
<b>B.2.4_2</b>	FiTI Reports must be widely distributed among key audiences, including	Compliant [3]	Compliant [3]

<sup>17</sup> This also includes information that is published on government websites vs. information that is provided in a FiTI Report.

<sup>18</sup> The FiTI Standard encourages the National MSG to consult with others outside of the National MSG in undertaking this review. However, this is not a mandatory requirement and therefore, falls outside of the scope of the validation.

	government, parliamentarians, companies, civil society groups, academia, the media, and international stakeholders.		
<b>B.2.4_3</b>	The National MSG must ensure that the main findings of the FiTI Report contribute to public debates on how the fisheries sector is managed, enabling relevant stakeholders as well as citizens of FiTI implementing countries to demand reforms towards better governance of their marine fisheries <sup>19</sup> .	Inadequate progress [1]	Inadequate progress [1]
<b>B.2.4_4</b>	FiTI Reports must be published online under an open license.	Inadequate progress [1]	Inadequate progress [1]
<b>B.2.4_5</b>	The National MSG must make users aware that information can be reused without prior consent.	Inadequate progress [1]	Inadequate progress [1]
		<b>Meaningful progress [Avg. 1.8]</b>	<b>Meaningful progress [Avg. 1.8]</b>

**Detailed comments independent validator:**

**[B.2.4\_1]** Both FiTI reports are written in a clear and non-technical language and use accessible visualisation techniques. Very good work.

**[B.2.4\_2 -2]** Both FiTI reports have been widely distributed amongst key stakeholders. They have featured in newspapers and on TV and radio. There have been workshops, media training and presentations at the Maritime Academy. The reports were presented to the Cabinet of Ministers and to the President.

**[B.2.4\_2 -3]** The BAR correctly mentions the absence of public debates even if, as mentioned just above, there have been various initiatives to communicate the information. Certain stakeholders explicitly mentioned their ambition to have such wider public debates. This being said, also the Minister has the ambition to have such debates. The challenge will be to bring information to the wider public in a digestible manner. As one stakeholder expressed it: "as information and not just data". Of course, this is a challenge because transforming data into information implies selecting data and interpreting them. The project of the MoFBE and the Minister, to work on better analysis of the meaning and the contribution of the fishery activity for the society at large, should lay a good foundation for such a broader public debate. As independent validator, having discussed the topic with various stakeholders and with the responsible authorities, I express good hope that such a debate (or series of debates) will eventually take place. One suggestion made by a new member of the MSG, to introduce a module on the fishery activity in the school programme, might also lead to a higher awareness in the society at large.

**[B.2.4\_4-5]** These technical aspects are taken on board by the MoFBE, SFA and MSG.

Concluding on the issue of B.2.4, the lack of public debate after the release of the report is recognized by several stakeholders (this comment stems mostly from civil society actors but it is also repeated by the Minister himself). This should be an action point for the new MSG. The quality of the FiTI report is such that it deserves a wider attention and a focus on a better follow-up. In the end, this should be beneficial for all involved. Also, the MoFBE should benefit from the positive energy that comes from a wide public debate.

<sup>19</sup> The FiTI Standard encourages National MSGs to contribute the lessons learnt and recommendations from FiTI Reports to policy dialogues and broader conversations about national reform efforts. However, this is not a mandatory requirement and therefore, falls outside of the scope of the validation.

## B3 – ASSESSMENT OF INDIVIDUAL REQUIREMENTS FOR ‘NATIONAL IMPLEMENTATION FRAMEWORK’

### B3.1 ENABLING ENVIRONMENT FOR STAKEHOLDER PARTICIPATION

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

#### Detailed comments independent validator:

[B. 3.1\_1] The results of FiTI are well known in the national and international community and extensively acclaimed by the stakeholders which were contacted. Whilst stakeholders may give comments on detailed aspects of the transparency process, there is broad recognition of the efforts made and results obtained. There is general recognition of the value of the FiTI process and expectation that this effort should continue. Some participants of the MSG indicated the extra value of the MSG as a contact forum for those involved in the fishery activity. Occasionally also other issues (than transparency) are being discussed and the process leads to building confidence between various participants and to pre-empt possible emerging conflicts.

In general, the Seychelles is fostering an environment of open public debate and citizen participation. It has introduced an Access to Information Act that is very well known to all stakeholders. In its National Development Strategy, transparency, access to information and public participation in decision making are key. The Seychelles joined the Open Government Partnership (in 2018) and the adoption of FiTI is a main objective under this OGP.

This systematic effort to pursue good governance is bearing fruit as may be witnessed by the fact that the Seychelles came out first in the Ibrahim Index of African Governance (2024). The results of this assessment were published during the validation visit and the various authorities are, justifiably, very proud of the outcome. It confirms their conviction that Open Government and Transparency offer a good way forward and ought to be further pursued.

### B3.2 GOVERNANCE AND SUPPORT

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

**Detailed comments independent validator:**

**[B. 3.2\_1]** Both the lead Ministry (MoFBE) and the National Lead (Mr Philippe Michaud) have been continuously in the lead. This stability is a key factor of success and is widely acknowledged by all stakeholders that were interviewed.

**[B. 3.2\_2]** Not applicable

**[B. 3.2\_3]** The responsibility for the FITI National secretariat now lies with the Department of Blue Economy of the MoFBE. Previously it was with the SFA. One staff member (now: Ms. Morel) is given the responsibility for the FITI process. She is very committed to her task and widely praised by the various stakeholders as being efficient and committed. She has the full support from her Permanent Secretary (Ms Ernesta). This being said, FITI is not her only assignment (she also works on Blue Economy issues) and she does not really benefit from an operational budget (e.g. to finance dissemination events). On the other hand, Also, the Permanent Secretary commented, in passing, that FITI is an extra assignment for her service.

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**B3.3 MULTI-STAKEHOLDER OVERSIGHT**

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

**Detailed comments independent validator:**

**[B. 3.3\_1]** The MSG consisted of 12 members and there is now an agreement to extend the composition to 15. The various stakeholder groups are equally represented (Government, Business and Civil society).

**[B. 3.3\_2]** There is no indication that the members of the MSG lack the qualification to participate. However, the meeting in September 2023 was poorly attended and the administration of the secretariat was poor in 2022 and the beginning of 2023. This resulted in data loss and poor handover of files. The data loss is probably irreparable but since November the attendance is at level again and the meetings take place punctually every two months.

[B. 3.3\_3] No comments on this criterion. Nobody questions the independence of the civil society representatives. During conversations, they are also the most critical in their comments.

[B. 3.3\_4] Qualification not questioned.

**B3.4 ANNUAL WORKPLAN**

<b>ID</b>	<b>Validation Indicator</b>	<b>Scoring BAR</b>	<b>Scoring Ind. Validator</b>
<b>B.3.4_1</b>	The National MSG must provide an updated Workplan for each upcoming reporting period.	Meaningful progress [2]	Compliant [3]
<b>B.3.4_2</b>	Each Workplan must provide a summary of FiTI activities undertaken in the previous reporting period, including an assessment of the level of progress in achieving the objectives set out in the previous Workplan(s).	Meaningful progress [2]	Meaningful progress [2]
<b>B.3.4_3</b>	Each Workplan must outline objectives, constraints, activities and outputs in accordance with requirement A.6 <sup>20</sup> .	Inadequate progress [1]	Meaningful progress [2]
<b>B.3.4_4</b>	Each Workplan must be approved by the National MSG two months prior to the upcoming reporting period.	No progress [0]	No progress [0]
		<b>Inadequate progress [Avg. 1.25]</b>	<b>Meaningful progress [Avg. 1.75]</b>

**Detailed comments independent validator:**

[B. 3.4\_1] The workplan was approved at the October 2024 meeting. This was after the BAR but has now been done. This being so, it is acceptable to propose a “compliant” score.

[B. 3.4\_2] The new workplan is now formally in place but the proper processing of previous workplans with input from stakeholders outside the MSG (as encouraged by the FiTI standard) was not up to standard. This bodes well for the future but one cannot be satisfied with the past.

[B. 3.4\_3] When the BAR was drafted, the workplan was still in draft but it was formally compliant, including vision, mission, objectives, timeframe, .. The International secretariat still qualified the progress as inadequate because the workplan still needed to be approved. In the meantime, this approval took place (meeting October). The validator considers that the qualification should be “meaningful progress”. It is still early days to comment on the effective quality and execution.

[B. 3.4\_4] See also above. The workplan did not adhere to the time frame. Admittedly, it is now formally in place.

The genesis of the workplan has been wobbly. Now it is in place. Overall, we can consider that there has been meaningful progress.

<sup>20</sup> This includes information about uncompleted objectives of previous Workplan(s), if applicable; activities planned for the upcoming reporting period; recommendations identified by the NMSG in previous FiTI Report(s), if applicable; and recommendations from validations, if applicable.

### 3. ASSESSMENT OF BREACHES OF PRINCIPLES AND SPIRIT OF THE FITI

No breaches of principle and spirit of the FiTI were identified during the stakeholder consultation phase. During the site visit, the government of the Republic of Seychelles did not show signs of wilfully withholding information the FiTI Standard requests to be published. All the validator requests were attended and clear explanations were given to the independent validator in cases where information was not published, e.g., by acknowledging administrative constraints, lack or loss of data, etc. The instances where loss of data occurred (because of physical incidents related to fungus spreading in the archives or because of ICT problems) were explained and can credibly be considered as real bad luck events (and not as “conveniently engineered” to make the information disappear). For both types of events, appropriate remedies have been put in place to avoid a new occurrence.

### 4. KEY OUTCOMES OF STAKEHOLDER CONSULTATIONS

The key outcomes of the broad stakeholder consultation can be summarized as follows:

- Wide appreciation for the FiTI process and recognition of the progress made,
- Wide recognition that the FiTI process leads to better transparency and better policy. FiTI is mentioned as a driver and motivator to pursue transparency.
- Broad expectation that the FiTI process should continue and lead to further policy improvement,
- Broad positive sentiment about the value of Good Governance for the country and ambition to continue on this avenue.
- The four categories of recommendations (corrective actions) mentioned in the previous compliance decision of the board have been addressed and largely though not entirely complied with.

### 5. RECOMMENDATION FOR THE OVERALL COMPLIANCE DESIGNATION OF THE SEYCHELLES

The draft of the present report was transmitted to the Government of the Seychelles (MoFBE). As validator I received precise feedback. I could not double check this extra information. However, the feedback and extra information have been integrated in my comments since they seem credible in line with the findings during the visit *in situ*.

On the basis of the assessment by the International Secretariat and the interviews with the local and international stakeholders, I recommend that the country be considered to be **compliant** with the FiTI standards.

### 6. EFFORTS THAT GO BEYOND FITI REQUIREMENTS

There are some instances where the efforts go beyond the FiTI requirements. In terms of efficiency, the fact that the MSG serves also as a meeting and conflict resolution forum over and above the analysis of transparency should be considered as a bonus.

### 7. SUGGESTED CORRECTIVE ACTIONS TO STRENGTHEN THE COMPLIANCE WITH THE FITI STANDARD

The results achieved until now should not be taken for granted. They are based on a considerable personal commitment by the National Lead, the National Secretariat, the staff at the MoFBE and the SFA and the political support offered by the Minister. Also, the broader moral support by the OGP is very important. However, the Seychelles are a small country with a constrained resource basis. It would be useful if the Government was willing to consolidate its support for instance by making available some dedicated budget resources.

Similarly, some improvements will require cooperation between various departments (MoFBE, NBS, Ministry of Employment). It would be good if such cooperation was officially encouraged and would not only depend on the Goodwill of the staff in the departments concerned.

Clearly, achieving transparency should not be considered a static goal to be achieved at a particular date but rather a dynamic result that must be achieved continuously and that requires permanent and sustained effort.<sup>21</sup>

## 8. SUGGESTED RECOMMENDATIONS TO STRENGTHEN THE IMPACT OF TRANSPARENCY ON SUSTAINABLE MARINE FISHERIES

As already clearly indicated in the BAR and in the present validation report, the country is now ready to build on the transparency that has been achieved and start a process of active information campaigns towards various stakeholders. This would lead to an inclusive process that would probably further strengthen the support for the fishery activity within the population at large. In this context, the use of a website alone as a communication tool is not sufficient. As a representative of the artisanal fishermen observed, many fishermen have no access to data on a website because they do not master the technique. As another stakeholder mentioned, the structure of the website should also be improved to facilitate its use.

## 9. AREAS OF PARTICULAR ATTENTION FOR THE FITI INTERNATIONAL BOARD

The Validator considers that the efforts made by the Seychelles and its effective achievements are such that the country merits a “Compliance” designation. This being said, there is obviously still room for improvement and it is reasonable to expect that the country itself may wish to consolidate its results and seek further improvement. The four conditions that were mentioned in the previous compliance statement have been addressed and largely but not entirely complied with, as was mentioned in the corresponding parts of this report.

The international board might wish to reflect on introducing further levels in its designations. Just like credit agencies use various “A level” designations for creditworthy countries (e.g. A/AA/AAA) or the Michelin guide uses three levels of stars to designate top quality restaurants, FiTI might also designate various levels of compliance and perfection. This would allow compliant countries to aim at yet higher levels of compliance and would add a level of aspiration.

Another comment was made about the frequency of the assessments. Various stakeholders argued that the annual reporting is too quick. It poses a challenge in terms of following up on the recommendations.

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<sup>21</sup> Using the language of Thermodynamics, if there were no continuous addition of energy and effort, the system would go into decay.



## Annex I: Validation Scorecard

Blue areas or text: assessment in BAR Green areas or text: assessment by validator

### Seychelles: Validation Scorecard (January 2022 – July 2024)

Requirements of the FiTI Standard (section B)	Level of compliance					Direction of progress  <i>Compared to previous validation(s): No change – worse – better (choose one)</i>
	Compliant	Meaningful progress	Inadequate progress	No progress	Exceeding (if applicable)	
<b>B.1 Transparency requirements</b>						
B.1.1 Public Registry of National Fisheries Laws, Regulations and Official Policy Documents						<i>No change//Better</i>
B.1.2 Fisheries Tenure Arrangements						<i>Worse//No change</i>
B.1.3 Foreign Fishing Access Agreements						<i>Better</i>
B.1.4 The State of the Fisheries Resources						<i>No change</i>
B.1.5 Large-Scale Fisheries						<i>No change</i>
B.1.6 Small-Scale Fisheries						<i>No change//Better</i>
B.1.7 Post-Harvest Sector and Fish Trade						<i>No change</i>
B.1.8 Fisheries Law Enforcement						<i>No change//Better</i>
B.1.9 Labour Standards						<i>No change</i>
B.1.10 Fisheries Subsidies						<i>Better</i>
B.1.11 Official Development Assistance						<i>Worse</i>
B.1.12 Beneficial Ownership						<i>No change</i>
<b>B.2 Procedural requirements for FiTI Reports</b>						
B.2.1 Reporting Requirements						<i>No change</i>
B.2.2 Reporting Deadlines and Periods						<i>Worse</i>
B.2.3 Reporting Process						<i>No change</i>
B.2.4 Report Dissemination and Public Debate						<i>No change</i>
<b>B.3 National Implementation Framework</b>						

## Seychelles: Validation Scorecard (January 2022 – July 2024)

Requirements of the FiTI Standard (section B)	Level of compliance					Direction of progress
	Compliant	Meaningful progress	Inadequate progress	No progress	Exceeding (if applicable)	Compared to previous validation(s): No change – worse – better (choose one)
B.3.1 Enabling Environment for Stakeholder participation						No change
B.3.2 Governance and Support						Better
B.3.3 Multi-Stakeholder Oversight						Better
B.3.4 Annual Workplan						No change//Better
B.3.5 Impact Report						Not applicable
<b>Overall compliance designation</b> <i>(for Independent Validators and FiTI International Board only)</i>						Not applicable
<b>Efforts that go beyond the scope of the FiTI Standard (optional)</b>						
None						