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Functional Review of the Fish Inspection and Quality Control Unit (FIQCU)
(Contract Number: N08/SWIO3/C/2023/C3)

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ABBREVIATIONS

CA	Competent Authority
EU	European Union
EUR	Euro
FAO	Food and Agriculture Organisation
FBOs	Fishery Business Operators
FIQCU	Fish Inspection and Quality Control Unit (of the SBS)
FPA	Fisheries Partnership Agreement
GoS	Government of Seychelles
HACCP	Hazard Analysis and Critical Control Points
HQ	Headquarters
HR	Human Resource(s)
IHR	International Health Regulation
IOT	Indian Ocean Trepang (based in Madagascar)
LIMS	Laboratory Information Management System
MFBE	Ministry of Fisheries and the Blue Economy
MIEI	Ministry of Investment, Entrepreneurship, and Industry
MoU	Memorandum of Understanding
PHA	Public Health Authority
RASFF	Rapid Alert System for Food and Feed
SBS	Seychelles Bureau of Standards
SCR	Seychelles rupee
SFA	Seychelles Fisheries Authority
SFPA	Sustainable Fisheries Partnership Agreement
SOPs	Standard Operating Procedures
SPS	Sanitary and Phytosanitary
WHO	World Health Organisation

1 Executive summary

This Report describes the activities and findings of a consultancy mission conducted between May and November 2023 under the SWIOFish3 (Seychelles) Project. The objective of the assignment was to conduct a functional review of the Fish Inspection and Quality Control Unit (FIQCU) of the Seychelles Bureau of Standards (SBS), being the Competent Authority (CA) responsible for the sanitary certification of fish and fishery products exported from the Seychelles. The assignment aimed to assess the functional efficiency and effectiveness of the FIQCU in fulfilling its mandate, as well as its ability to deliver those functions in line with development policy and objectives for the fisheries sector.

Fish and fishery products are estimated to account for 96% (SCR 4,369,752 million) of total merchandise exports from the Seychelles in 2022, with Europe being the primary market. The FIQCU under the SBS (an authority without financial autonomy under the Ministry of Investment, Entrepreneurship & Industry (MIEI) is designated through the Export of Fishery Products Act 1996, as the Competent Authority of the Seychelles, and as such is responsible for guaranteeing (through the issue of health certificates) that exports of fishery products are safe for human consumption, in line with the demands of the legislation of importing countries, and in particular with the requirements of the EU. Compliance is essential for market access and the work of the FIQCU is periodically audited by DG SANTÉ of the European Commission.

The FICU is thus responsible for official controls (which includes ensuring compliance of all vessels, landings, landing sites, cold stores, and processing facilities in the export supply chain, supervision of vessel discharge, and sampling and testing) and certification. In 2020 these controls covered 64,098 tonnes of exports, hygiene conditions on 170 Seychellois flagged fishing vessels (including 13 purse seiners authorised for EU export and 63 industrial freezer vessels), products discharged from 35 foreign purse seine vessels and checks on daily landings at 3 designated industrial ports and in 14 approved shore establishments. On the basis of these controls, FIQCU issued health certificates for 2,549 export consignments in 2021. In addition, FIQCU controlled origins and safety of 284 imported containers of frozen tuna. Sustaining the very significant contribution of the fishery sector to the national economy is thus entirely dependent on the FIQCU's effectiveness in ensuring the safety of all of these elements, which contribute some 96% of exports of goods from Seychelles.

The institutional mandate, powers and control system are defined in a clear legal framework under the Export of Fishery Products Act 1996 and associated regulations. There is no conflict with the Food Act 2014, which addresses domestic food safety. However, there is some potential for overlap with current proposals for revision of the Fisheries Act, applied by the Ministry of Fisheries and Blue Economy (MFBE) which should be clarified. The FIQCU is supported by a budgetary appropriation via the MIEI of the order of SCR 4 million in 2024 (which includes operating costs and an element of SCR 0.8 million for laboratory testing by SBS, but no capital investment). Estimated cost recovery (fees to be paid into the Treasury Account in 2024) based on a new, but as yet unapproved pricing schedule, is likely to amount to SCR 2.4 million, suggesting that the net cost to Government will be in the region of SCR1.6 million. The total operating cost of the FIQCU approximated to 0.08% of export value in 2022. For 2024 the FIQCU has additionally secured SCR 1.2 million from the EU-Seychelles Sustainable Fisheries Partnership Agreement for investment, which will provide for a short-term contract to replace the head of FIQCU (due to retire mid-2024), software and inspection equipment.

The FIQCU operates under several significant constraints. Out of 8 technical staff, only one, the current head, has a relevant qualification; technical performance of inspections is therefore compromised and receives criticism from some operators. Attempts to recruit a replacement for the retiring head of FIQCU have so far failed since salary levels are insufficient to attract qualified technical staff. Additional to this, the lack of a clear career structure within the FIQCU creates a further disincentive to recruitment of younger well qualified staff. As a result, there is a high turnover of staff leaving to find

better conditions in the private sector. Whilst the FIQCU performs adequately on day-to-day tasks of inspection and certification, the lack of qualified staff with relevant scientific knowledge means that several critical tasks in the technical management of the FIQCU are not performed (efficient risk-based management of inspection system, risk assessment, record keeping, reporting and staff training). The FIQCU therefore performs only the reactive tasks necessary to keep immediate trade flows moving in the short term, rather than acting pro-actively to ensure that its service remains in line with the strategic needs of the fishery sector.

Furthermore, in terms of infrastructure and equipment, following a fire in March 2022, the unit has been operating from very limited facilities at SBS, reducing technical performance, efficiency and convenience for staff and operators, further compromised by insufficient access to vehicles (bearing in mind that many tasks are performed out of office hours). There are no office facilities for inspectors at Victoria Quay, Providence, and Ile du Port sites, nor at the airport. Other than the issue of EU certificates, all systems and records are paper based, reducing efficiency and missing the opportunity for improved risk profiling of operators.

The consequence of these constraints is that FIQCU is not able to fulfil its mandate to the extent required to fully meet its obligations set out in law. Many Seychelles registered Asian-owned freezer vessels are not subject to inspection at all, and only a proportion of landing events of industrial and semi-industrial vessels (and almost none of small-scale vessels) are supervised. Only an estimated 10% of export consignments were subject to inspection in 2021. Operators complain of the time-consuming process and errors in export certification (especially non-EU exports). Furthermore, it should be noted that the export fishery sector of Seychelles is a highly dynamic environment. Following recent fisheries negotiations up to 100 Taiwanese operated freezer vessels are expected to commence landing in Victoria. Investments in six new export processing establishments at Île du Port are under way, all of which points to a significant increase in control tasks in future, for which there is no spare control capacity available.

Ensuring the sustainable functionality of FIQCU may be considered to be the most important task of the MIEI. However, these constraints have meant that in recent years both short-term needs (repairing the office, recruiting a replacement head of unit) and longer-term needs (investment in human resource development, software and port offices to meet current and future demand) have not been sufficiently addressed. This study concludes that FIQCU's needs have not been prioritised in Government's policy framework to a level commensurate with the economic importance of maintaining market access. As a result, the performance of its mandate has been eroded over time and is currently sub-optimal. Without prompt attention to address the constraints there is a risk to market access being compromised by system failure. Importing country responses could include rejection of non-compliant consignments, implementation of safeguard measures at importer costs, or selected import restrictions. Any one of these measures would significantly undermine the competitiveness of the fishery product exports and thus the national economy of the Seychelles. There is a need for urgent action to significantly strengthen the capacity of the FIQCU and ensure that it can maintain a flexible and high level of service. The consultant estimates that in the medium-term, an annual operating budget of SCR 10.25 million will be required to sustain a full service¹. In addition to the current (2024) SFPAs sectoral support, the FIQCU will need a minimum of SCR 1 million in capital investment. It is however expected that overall, a 50% cost recovery rate on export related activities (derived from approval and certificate fees) should be achievable.

¹ This includes about SCR 1 million/year for inspection in the domestic market for fish, should the mandate of FIQCU be extended to address the current absence of controls in this area

Many of the constraints experienced by the FIQCU arise because of the static nature of the staffing and financial dimensions of the service, in the face of highly dynamic fishery sector, which is well tuned into meeting the changing needs of global markets. In general, a more flexible means should be sought of ensuring that the FIQCU remains fit for purpose, and which reflects the changes within the Seychelles fishery sector (as well as meeting the needs of evolving regulatory requirements for SPS measures in international trade, and scientific understanding of hazards). FIQCU should therefore be able to act as independently as possible from the restrictions applied to regular government services.

Concluding discussions held by the consultant at a high level with the MFBE, the MIEI and the Ministry of Finance (Public Service Commission) show that the Government of Seychelles clearly recognises the vital strategic importance of FIQCU to the national economy. All Ministries are concerned that in recent years budgetary limitations have impacted negatively on the quality of service and increasing the risk of export of non-compliant fishery products. All Ministries consider that steps should be taken to ensure that immediate short-term needs are addressed to guarantee the Unit's operational effectiveness, and that in the medium term its management and budgetary arrangements should be optimised to address the structural deficiencies identified in this functional review.

The consultant concluded the study by considering several options for the institutional framework, from the point of view of ensuring optimal policy and financial support. In all future scenarios it is recommended that laboratory testing services should remain within the SBS, with the FIQCU contracting the services as required (as well as outsourcing to other labs where appropriate). Capital investment requirements may also be met through the sectoral support programme of the SFPA.

However, the location of the FIQCU in future within a structure which limits the ability to pay salaries which are attractive enough to recruit and retain well-qualified and experienced staff at all levels will maintain all of the structural disadvantages and constraints identified above. For this reason, neither the continued location of the FIQCU within the SBS of the MIEI nor establishment of FIQCU as a Department within the MFBE are considered able to provide sufficient guarantee of sustainable operational finance in the future.

If the FIQCU were to be transferred to an independent Authority under the jurisdiction of the Ministry of Fisheries and Blue Economy, this would ensure greater coherence with fisheries policy and evolving operator activities. It would also provide the potential to draw directly on financial sources other than the state budget, notably the income generated by FIQCU, as well as providing greater flexibility in salaries offered, to ensure recruitment and retention of qualified staff. The establishment of a new Authority specifically for the FIQCU is considered to provide a perfect solution, but at a cost which is unacceptably high. However, the transfer of the FIQCU as a Department within the Seychelles Fishing Authority is considered to be entirely feasible, subject to two important considerations. Government would need to agree to forego the income currently received from FIQCU activities (SCR 2.4 million estimated in 2024) which would be retained by the SFA in favour of the FIQCU. In addition, there should be an agreed mechanism for ongoing and secure financing of operational expenditure. The required budget may be provided directly through a budgetary appropriation via MBE equivalent to current levels (SCR 4 million/year), or adjustment of the SFA dividend paid to Government in recognition of the additional Competent Authority function to be performed. Legislation would need to be amended accordingly, specifically the Export of Fishery Products Act and the SFA Establishment Act. Some potential risks of conflict of interest (notably SFA technical advisory services and management of fisheries infrastructure) can be minimised through the adoption of clear and transparent mandates and procedures, supported by audits (internal and/or external).

For this reason, the study recommends that discussions be held as soon as possible at the highest level in the MIEI, MFBE and Ministry of Finance, with a view to considering the transfer of the FIQCU to the Seychelles Fishing Authority as from January 2025.

2 Introduction

This Report is submitted by Ian Goulding of Megapesca Lda, Portugal, under a contract with the SWIOFish3 (Seychelles) Project for the provision of consultancy services in relation to a Functional Review of the Fish Inspection and Quality Control Unit (FIQCU) of the Seychelles Bureau of Standards (SBS). The Contract for the services was signed by the parties on 10th May 2023.

The objective of the assignment was to conduct a review of the FIQCU as the Competent Authority (CA) responsible for the sanitary certification of fish and fishery products exported from the Seychelles. The assignment aimed to assess the functional efficiency and effectiveness of the FIQCU in fulfilling its mandate, as well as its ability to deliver those functions in line with development policy and objectives for the fisheries sector. Based on this review, the consultant was required make recommendations and prepare a capacity building plan to improve functionality and strengthen the capacity of the FIQCU. The Terms of Reference are shown in Annex 1.

This report therefore sets out the findings and recommendations concerning an evaluation of the food safety controls applied by the Government of Seychelles in the export of fishery products, along with recommendations for strengthening the capacity of the Competent Authority and options for its future legal and institutional framework.

3 Background to the contract

Fish and fishery products are estimated to account for 96% (SCR 4,369,752 million) of total merchandise exports² from the Seychelles in 2022, with Europe being the primary market. The FIQCU under the SBS was designated through the Export of Fishery Products Act, 1996, as the Competent Authority of the Seychelles. The FICQU is therefore mandated to perform official controls on the sanitary conditions of fish and fishery product for export purposes, including the issuance of health certificates for every consignment of fish and fish products exported from the Seychelles to any destination country.

As a result of the expansion of the fishery sector and exports, and the future prospects for growth in the fisheries sector and concerns regarding the capacity of the CA to effectively and efficiently deliver services to the sector, the Ministry of Fisheries and the Blue Economy (MFBE) has recruited the consultant to undertake a functional review of the Fish Inspection and Quality Control Unit, and to propose future options for the institutional framework, capacity needs and policy support needed for effective fisheries sector food safety controls.

4 Activities undertaken

Following a desk-based review and submission of a preliminary workplan, the project field activities commenced with a mission to Seychelles between 5th and 30th June 2023.

During the mission the consultant undertook the following activities.

² Merchandise Trade Statistics Series, Seychelles National Bureau of Statistics

<https://www.nbs.gov.sc/component/edocman/20-downloads/5-other-publications/51-data-series/1389-merchandise-trade-statistics-series-2>

1. Consultation meetings with the Ministry of Fisheries and Blue Economy, key staff in the Seychelles Fishing Authority and SWIOFish3 Project Manager
2. Submission of an Inception report with Workplan was submitted on 9th June.
3. Meetings with Seychelles Bureau of Standards (FIQCU and Biochemical Testing Services)
4. Meeting with the Public Health Authority and Food Control Unit
5. Meeting with the Central Bank concerning economic contribution of fisheries
6. Consultation with fishery sector stakeholders (export processors, cold storage, freight forwarding agencies engaged in export of fishery products and associations)
7. Consultation with private sector laboratory service providers
8. Review of legislation (current and proposed) on fisheries, standards and institutional mandates
9. Analysis of financial and statistical data concerning the activities of the FIQCU
10. Analysis of statistical data concerning the fishery sector and estimation of future dimensions of fishery sector sanitary control tasks

The mission was followed by further online meetings from the consultant's home office with key stakeholders, discussions concerned the source of finance for the FIQCU, the relative advantages and disadvantages of the different options for the future institutional arrangements and preparation of budgets.

5 Functions undertaken by the FIQCU

The Fish Inspection and Quality Control Unit was established as the Competent Authority in 1995. Following a brief period under the Ministry of Agriculture and Seychelles Fisheries Authority (SFA), the unit was located within SBS, with formal decisions taken by the Board of the SBS. At the time, SBS as an independent authority with an evolving quality inspection division and investments in a testing laboratory, was considered to be better placed to provide the necessary technical and institutional support. The core technical functions performed are:

- Official controls (inspection of vessels, landings, landing sites, cold stores in the export supply chain)
- Supervision of vessel discharge
- Management of annual approval system for vessels and establishments
- Designation of testing laboratories, and ensuring quality of testing
- Risk based design and management of monitoring programmes (fishery products and production environment)
- Sampling of products, water, ice etc. used in the export supply chain
- Follow-up non-compliances in inspection findings and testing results
- Export Certification (including as CA of country of despatch for foreign vessels discharging to cold store or container)
- Checking traceability of imported fishery products for re-export

- Managing external relations with CAs in other countries (e.g. Memorandum of Understanding's (MoUs), audits, certification checks)
- Responding to alerts (EU RASFF system)/complaints/crises concerning exported consignments
- Periodic reporting (inputs and outputs)
- Monitoring scientific and technical updates & dissemination of information on food safety requirements
- Codex Contact Point, participation Food Control Board and the Sanitary and Phytosanitary (SPS) committee.

All of the above tasks fall under the responsibility of the Head of the FIQCU, as well as administrative budgeting and Human Resource (HR) functions.

6 Nature and Dimensions of the control tasks

It should be pointed out that effective export controls require that food safety conditions at all stages of the supply chain should be subject to inspection and control. It is not simply a matter of sampling and testing a consignment presented for export, and issue of a certificate.

The work of the FIQCU has evolved not only due to the diversification and volume of exports, but also because the nature of the control tasks is not static. Strengthening of regulatory systems by sanitary authorities in export markets, and improved knowledge of food safety hazards are key drivers in the evolution of sanitary measures applied to international trade. To illustrate this point, the technical and complex nature of the control tasks required to meet EU requirements, and their evolution over time are shown in **Error! Reference source not found.**Figure 1 overleaf.

Since its creation the key changes in the regulatory environment which have impacted on the FIQCU are:

- Extension of official controls to all parts of the supply chain (including fishing vessels and aquaculture producers)
- Application of Hazard Analysis and Critical Control Points (HACCP) requirements to freezer vessels
- Increased range of hazards/residues to be monitored (e.g. environmental contaminants such as PCBs and dioxins)
- Adoption of electronic document submission (EU TRACES)

Other than a need for more qualified and knowledgeable staff, these changes require periodic technical adjustments to the legislation, the operational procedures, and methodological approach to the implementation of control measures. As an example, changes to maximum permitted levels of heavy metals in EU legislation have required an increased level of sampling, and a need to acquire knowledge regarding the impact of multiple factors (such as fish species, size, sex and catch location) on compliance. Such studies require significant scientific inputs (in sample design, data analysis and interpretation) which require FIQCU to apply significant resources to these tasks.

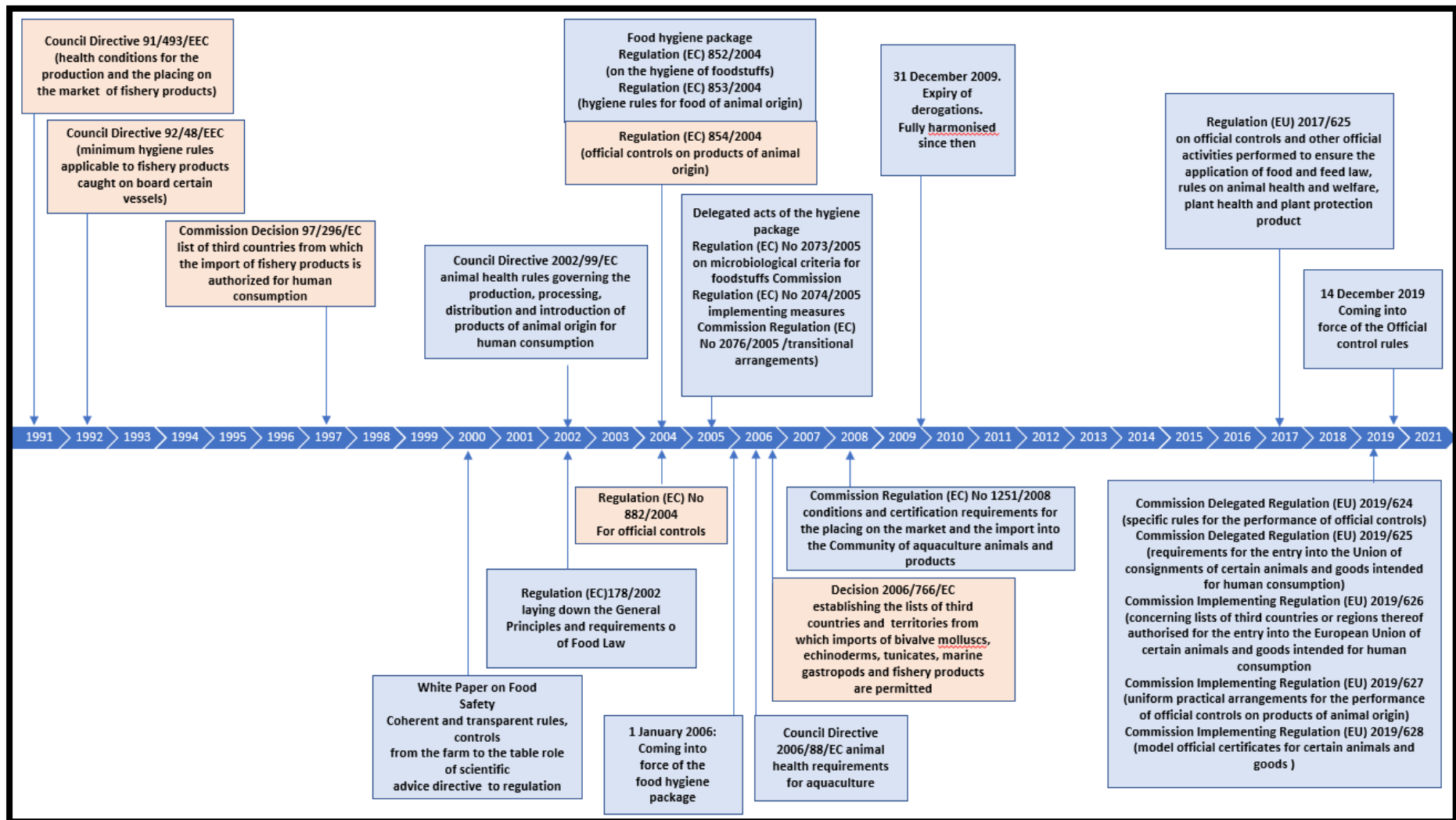


Figure 1: Evolution of EU legislation for food safety of fishery and aquaculture products applicable to imports from third countries

At the time of the establishment of the FIQCU in 1995, the Indian Ocean Tuna (IOT) cannery (then operated by Heinz Europe) was the only exporter, other than some informal regional trade. Since that time, the sector has expanded significantly with many more operators (including landings by foreign flagged vessels) and a much-diversified portfolio of exported products and associated markets. The dimensions of the control tasks are now substantial. The export of fishery products is the backbone of the Seychellois economy. Fish exports are shown in Table 1:

Table 1: Exports of fishery products from Seychelles

		Canned tuna	Fresh/frozen fish	Fish meal	Fish oil	Sea cucumber, shark fin and crustaceans	Total
2016	Quantity (tonnes)	36,904	3,099	8,084	1,037	57	49,181
	Value (SCR million)	3,473	69	103	41	36	3,722
	Value (EUR million)	236.2	4.7	7.0	2.8	2.4	253
2017	Quantity (tonnes)	34,665	5,561	8,322	572	60	49,180
	Value (SCR million)	3,494	108	115	35	44	3,796
	Value (EUR million)	228.2	7.1	7.5	2.3	2.9	248
2018	Quantity (tonnes)	36,356	10,966	8,029	1,641	49	57,041
	Value (SCR million)	3,817	223	127	293	41	4,501
	Value (EUR million)	231.4	13.5	7.7	17.8	2.5	273
2019	Quantity (tonnes)	35 951	13,886	7,809	1,158	46	22,899
	Value (SCR million)	3,098	237	115	77	50	3,577
	Value (EUR million)	196.3	15.0	7.3	4.9	3.2	227
2020	Quantity (tonnes)	42,976	11,180	9,003	881	58	64,098
	Value (SCR million)	4,383	274	174	77	87	4,995
	Value (EUR million)	230.6	14.4	9.2	4.1	4.6	263

Source: Annual Reports, Seychelles Fishing Authority

Export data in SCR is distorted by some quite significant currency variation in recent years. Export levels have remained reasonably steady at round €250 million/year. The headline features for the annual food safety control tasks undertaken by the CA (2020) are as follows.

- Overall, 64,098 tonnes of exports are subject to control, valued at SCR 4,995 million in 2020 (EUR 262.8 million), accounting for 90% of export of goods
- Around 170 Seychellois flagged fishing vessels are supplying exports (includes 13 purse seiners authorised for EU export). It also includes 63 Taiwanese industrial freezer vessels which fly a Seychelles flag and which submit no requests for health certificates. They are expected to commence landing in 2024 under a revised Taiwan Deep Sea Fisheries Agreement, November 2022)
- 35 foreign (32 EU, 3 other flags) purse seine vessels discharge regularly
- 55,000 tonnes tuna landed for processing into IOT
- 280,000 tonnes tuna transhipped to containers and refrigerated transport vessels
- Daily landings at 3 designated industrial ports (plus at least 7 landing sites for artisanal fishers, mostly serving domestic markets but from which supplies may potentially be directed at exports)
- 14 Shore establishments with HACCP systems (11 processing, 1 cold store, 1 fishmeal and 1 fish oil plant) plus 6 more processing investments approved
- 284 containers of frozen tuna certified for import

Sanitary approval and periodic inspection of freezer vessels for EU supply is the responsibility of the flag state. There is no requirement for approval of other vessels (e.g. Surface Longlines (SLLs) with no freezing capacity), but they should be subject to listing and periodic inspections and control. Only such vessels which comply with requirement may supply the EU.

The Seychelles CA therefore has direct responsibility for the inspection and sanitary control of national assets comprising a total of 13 purse seine vessels, 63 Industrial longliners, 35 semi-industrial longliners and 50-60 artisanal vessels, as well as their landing sites and 14 approved shore- based establishments (processing, fishmeal and oil, and cold store). The tasks require dealing with high-risk products (canning of low-acid foods) and products with risks of hazards which are difficult to control (histamine, heavy metals).

7 Legal and institutional aspects

The legal basis for the CA functions is clear, under the Export of Fishery Products Act 1996, which locates the mandate for export health certification of fish within the Seychelles Bureau of Standards (SBS) under the Ministry of Investment, Entrepreneurship & Industry. The Fish Inspection and Quality Control Unit is responsible within the SBS structure, but key decisions are taken by the Board of SBS on the advice of the Unit. The policy and legal framework is described in this section, along with the relevant elements of fisheries and food safety policy and law.

7.1 Sanitary controls on fish exports

7.1.1 Assessment of compliance with policies and strategies

The only specific provisions concerning fish exports are contained within the fisheries policy framework set out in the “Seychelles’ Fisheries Sector Policy and Strategy (2019)” described above. The specific performance of the FIQCU in meeting these objectives for fish exports is considered in Section 9.

7.1.2 Assessment of compliance with legislation

The framework legislation applicable specifically to sanitary controls for fish exports is the Export of Fishery Products Act 1996 and regulations thereunder. The key measures are described in the table below.

Title	Description
Seychelles Export of Fishery Products Act 1996	This Act is the originating primary legislation establishing the Competent Authority and its duties and powers. provides the powers of the Ministry. It requires that sector operators of fish processing establishments and factory vessels possess a permit from the Competent Authority for the export of fish. Appointment procedure and powers of authorised officers are defined, and powers granted to the Competent Authority to adopt detailed regulations setting permit conditions.
Seychelles Export of Fishery Products (Amendment) Act, 2010	This Act amends the 1996 Act by adding freezer vessels to the list of export items requiring approval and establishing the Minister responsible for Industry as responsible for implementation.
Seychelles Export of Fishery Products (Sanitary) Regulations, 2010 (S.I. 82 of 2010)	<p>The Seychelles Export of Fishery Products (Sanitary) Regulations, 2010 (S.I. 82 of 2010) provides for the control of the production of fishery products intended for export.</p> <p>The use, operation, or being in charge of an establishment or a factory or freezer vessel where fishery products intended for exportation are prepared, processed, chilled, frozen, or stored requires a permit granted by the Competent Authority. The applicant must satisfy the Director that the establishment or vessel meets operating and management requirements in accordance with this regulation, the Food Act, the Fisheries Act, and other specified Acts. Specific technical conditions are set out in the Schedules to the Regulation, which deal with:</p> <ol style="list-style-type: none"> 1: Conditions to be applied to the award of permits 2: Health conditions for all fishing vessels 3: Health conditions for freezer vessels 4: Health conditions for factory vessels 5: General health conditions for fish landing sites 6: Requirements for storage and means of transport 7: General health conditions for fish processing 8: Special conditions for handling fishery products 9: Packaging requirements for fishery products 10: Food safety conditions for fishery products 11: Identification marks for fishery products

	<p>12: Hazard Analysis and Critical Control Point System</p> <p>13: Requirement for traceability and recall procedures</p> <p>14: Requirements for potable water</p>
Seychelles Export of Fishery Products (Aquaculture) Regulations, 2010 (S.I. 83 of 2010)	The regulations extend the food safety controls to include products of animal origin produced by aquaculture. Hygiene conditions for aquaculture farms are described in the Schedule. Certain substances are banned, and aquaculture operators may only use permitted therapeutic interventions. Specific permitted compounds and Maximum Residue Levels are specified in a Schedule. The Competent Authority is required to prepare and implement an annual residue monitoring plan to assess compliance with the regulation.
Seychelles Export of Fishery Products (Aquaculture feed) Regulations, 2010 (S.I. 84 of 2010)	These regulations establish the sanitary conditions and controls to be applied to the production and export of fishmeal and animal feeds. It aligns requirements with EU for hygienic production, including HACCP and traceability conditions and contaminant limits.
Seychelles Export of Fishery Products (By-Products) Regulations, 2010 (S.I. 85 of 2010)	Regulation establishing the requirements and controls for the export of by-products (both fit for human consumption or animal feeds, as well as material which is unfit, including fish oils). Sets the hygienic conditions for export approval and certification, along with maximum limits for pathogenic microbiological criteria and hazardous environmental contaminants.
Seychelles Export of Fishery Products (Sanitary) (Amendment) Regulations, 2011 (S.I. 55 of 2011);	Amendments to the Schedules of detailed technical conditions for the export of fishery products, in respect of alignment of heavy metal limits, temperature control in histamine producing species and water microbiological standards with EU requirements.
Seychelles Export of Fishery Products (Designated Landing Sites) Order, 2015 (S.I. 61 of 2015)	These regulations designate the ports at which fishery products for export may be landed, namely Victoria Fishing Port and Providence Artisanal Fishing Port,
Seychelles Export of Fishery Products (Designated Landing Sites) Order, 2022 (S.I. 10 of 2022)	These regulations add Ile du Port Handling Services Limited (IPHS) to the designated list of ports at which fishery products for export may be landed.
Seychelles Export of Fishery Products (Sanitary) (Amendment) Regulations 2022 (S.I. 24 of 2022)	In 2022, amendments to the Export of Fishery Products (Sanitary) Regulations 2010 were approved by the cabinet to allow Seychelles to remain in line with the requirements laid under the European Union (EU) legislation. The amendment is focused mainly on adjusting the permitted contaminants found in fish, namely, lead, cadmium and mercury and serves to ensure national laws are in line with the standards required by the European market. It also sets limits for the levels in fish of dioxins, dioxins-like PCBs (DL-PCB)

	and non-dioxins like PCBs (NDL-PCB) and their congeners, as well as maximum limits of Polycyclic Aromatic Hydrocarbons n smoked fish.
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The legislation has been amended over the years to ensure that it is kept up to date with:

1. The evolution of the Seychellois fishery sector, such as investments in fish oil extraction for human consumption and use of brine frozen bycatch, all with specific requirements in EU legislation, and added to the scope of controls in 2010
2. Subsequent amendment and additions to EU legislation for example modification of the maximum limits of heavy metal contaminants.

The legislation is periodically audited (along with implementation of controls) by the DG Health and Consumer Protection of the European Commission. Powers to perform functions are considered to be adequate and in line with EU requirements. An audit in 2011 concluded that, although some contaminant limits were not fully aligned, “there is a comprehensive legal framework concerning the production and the export of fishery products from the Seychelles.” A subsequent audit was conducted in November 2018 focusing on tuna products exported to the EU. This found that previous non-compliances identified in the regulatory framework had been corrected or were in hand (awaiting the Attorney General to prepare for adoption).

Therefore, the current legal framework for the implementation of functions of the FIQCU may be considered to be compliant with EU requirements.

However, it is apparent that any change of institutional framework (considered as a future option later in this report) will require a substantive amendment to the Act as well as potentially that concerning mandates of other ministries/institutions engaged. The relevant legislation concerning other stakeholders in fishery sector controls (related to institutional mandates for fisheries and food safety) was therefore reviewed and is summarised in Annex 3.

7.2 Fisheries sector

7.2.1 Assessment of compliance with policies and strategies

The Ministry of Fisheries and Blue Economy has an overall mandate for policy and legislation in the area of fisheries and aquaculture. In 2019 the World Bank launched an intervention to support the “Preparation of Seychelles’ Fisheries Sector Policy, Strategy and Development Plan” through the SWIOFish3 project. The Ministry of Fisheries and Blue Economy subsequently developed and adopted the Seychelles Fisheries Sector Policy and Strategy 2019. This presents a range of measures directed at “Infrastructure support and value chain development”. This commits the Government to the following aims relevant to this study:

1. Working towards establishing domestic food safety regulatory systems, including food inspection/assurance and certification systems that harmonize with international standards (such as Codex) and that are consistent with the importing country obligations under the Sanitary and Phytosanitary Measures (SPS) and the Technical Barriers to Trade (TBT) Agreements of the World Trade Organization;
2. Evaluate the need for one single institution to control foods safety standards;
3. Development training programmes for fishers and fish receivers/fishmongers on proper handling, preservation and processing methods;

4. Strengthen the capacity of the relevant authorities (e.g. SBS & FIQCU) to allow the institution to deal effectively with the needs of the fisheries and aquaculture sector and in particular traceability systems, monitoring, food testing and issuance of certificates.

Of these aims, No.4 is the most relevant for this study in the short-term. Clearly Government has provided a consistent budgetary appropriation for SBS and FIQCU, which has allowed it to perform a satisfactory task. However, as set out in Sections 8 and 9 of this report, the budget, staffing level and operational procedures have not kept up with evolving technical needs of the CA, nor of the expansion of the fishery sector. For example, not all landings of fish for export are subject to checks and certification procedures for some exports remain paper based.

Until now no steps have been taken directly towards securing improved regulation of the food safety of the domestic fish supply chain (No.4 in the above policy aims). Although significant infrastructure investment by the Government of Seychelles has supported improved standards, this has not been combined with strengthening enforcement of existing regulations governing the sector, to ensure the appropriate usage by fishers. Along with the lack of clear mandate and resources of FIQCU to engage with small scale fish landings (which can also supply exports). Although coherence has improved significantly³, this suggests a need for further policy coherence between regulatory measures and investment.

7.2.2 Assessment of compliance with legislation

Fisheries Act

The principal instrument of sector governance is the Fisheries Act 2014. The Act is silent on controls concerning quality and safety and for regulation of fish processing. The regulatory power under Section 6(2) to regulate the “(a) taking, possessing, purchasing, selling, importing or exporting of any gear or fish” applies only insofar as subsection 6(1) permits that the Minister may make regulations prescribing measures for the proper management of a fishery. Therefore, at present the Fisheries Act contains no substantive provisions concerning food safety.

However, the 2014 Act is currently undergoing a revision, and the draft Bill contains a provision (section 54(c)) which states:

- *Without prejudice to legislation relating to the sale, export or trade in fish or to food safety, no person shall, without such license, permit or authorisation as may be required by law.....*

.....

(c) export aquaculture products for human consumption from Seychelles unless they are produced in an aquaculture establishment under and in accordance with a permit granted under these Regulations by the Chief Executive Officer of the Seychelles Bureau of Standards

In addition, section 75 makes provision for the *conditions for the quality of fish on board vessels, stating that:*

- *The licence, authorisation, registration or other permission in relation to any vessel may include requirements concerning the quality of unprocessed fish which is on:*

- *a vessel registered in Seychelles; or*

³ This lack of coherence was evident historically in the construction by SFA of non-compliant processing units at Providence, which could not be approved for EU export without significant modification.

- b. any vessel while under the jurisdiction of Seychelles.*

This gives rise to potential for confusion or dual inspections (e.g. by conflating quality and safety, combining sanitary matters with vessels registration conditions). Given that all of the relevant controls are defined under the Fish Export Act, there is no need for the Fisheries Act to address these matters other than to refer to the Fish Export Act and the Food Control Act.

The Fisheries Act should therefore remain focused on the sustainable management of the fishery resource, to ensure legal clarity under the Food Act and Fish Export Act.

SFA Establishment Act

Furthermore, the MFBE delegates implementation of many of its legal measures under the Fisheries Act to the Seychelles Fishing Authority, as well as enabling it to undertake development actions in support of the fishery sector. The SFA was established by the SFA Establishment Act 1984, with the functions:

- *to promote, organize and develop fishing, fishing industries and fishing resources in Seychelles;*
- *to assist in the formulation of the national policy with respect to fishing, fishing industries and fishing resources and in the implementation of that policy;*
- *to conduct negotiations, or engage in meetings, seminars or discussions, with regard to fishing or fisheries or the establishment or operation of fishing industries, whether at a national or international level, on behalf of the Republic or otherwise;*
- *to identify the manpower training requirements of Seychelles with regard to fishing and fishing industries; and*
- *those mentioned in any other written law.*

There is no specific mention of quality or safety of fishery products. The SFA has however developed the Seychelles Fishing Authority Strategic Plan 2018 – 2020 published in May 2018, in which Volume 1 Goals and strategies sets out a ‘Seafood value chain development and upgrading strategy’ which seeks implement three key processes:

1. Process 1: The identification and prioritisation of seafood value chains in the Seychelles
2. Process 2: Analysis of prioritised value chains through mapping, allowing the identification of limitations and the development of interventions
3. Process 3: Investigating the current and future capacity needs of the seafood value chains

In support of policy concerning the needs of the value chain, the SFA formed a post-harvest unit, which in 2022 was renamed as “Product Development and Quality Assurance Department” with a clear mandate to provide support services to the Seychellois fishery sector in increasing the economic value of products generated by fishery sector operators.

The SFA Establishment Act 1984 is also under review and a Draft Bill for its replacement expresses the functions of the Authority in the following terms:

4. *The functions of the Authority shall be to:*
 - a. *promote, organise, develop, and manage sustainable fisheries;*
 - b. *advise the government on all matters related to fisheries;*

- c. *assist in the formulation of national policies with respect to fisheries and lead the implementation of these policies;*
- d. *assist in negotiations and represent Seychelles on matters related to fisheries at both national and international level;*
- e. *promote and conduct scientific research related to fisheries;*
- f. *enter into agreement in consultation with the authority responsible for ports, for the management or joint management of ports and port facilities;*
- g. *administer the Fisheries Act, 2014 (Act 20 of 2014) and regulations made thereunder and other written laws relating to fisheries; and*
- h. *advise the government on the manpower training requirements of Seychelles with regards to fisheries.*

It is notable that extension of functions to those attributed “by other written laws” (section 5(e) of the 1984 Act) is omitted from the draft Bill. Such an inclusion would be necessary to ensure lawful scope, should SFA be required in future to adopt a role in sanitary regulation.

7.3 Food safety control system

7.3.1 Assessment of compliance with policies and strategies

In 2018, the World Health Organisation (WHO) and Ministry of Health conducted a Joint External Evaluation of International Health Regulation (IHR) (2005) of the Core Capacities of The Republic of Seychelles health system⁴. In relation to food safety, the main recommendations were:

1. Revise relevant food safety regulations to enable effective enforcement of the revised Food Act 2014.
2. Develop and implement Standard Operating Procedures (SOPs), guidelines and MoUs to enhance collaboration with key sectors on food safety issues.
3. Reinforce the workforce and train relevant personnel in food safety related activities.
4. Strengthen laboratory capacities in both the public and animal health sectors, through completing and equipping the veterinary laboratory and training personnel in both sectors.
5. Undertake a feasibility study to inform political decision making for the establishment of a National Food Safety Agency

More recently, the Food and Agriculture Organisation (FAO)/WHO has supported the Government of Seychelles to apply the WHO/FAO Food Control Assessment Tool. This completed an initial review which presented a draft report and a validation workshop in September 2023⁵. This is expected to be followed by development of a recommended policy framework, revised legal measures and support for implementation and capacity building. More details are expected to be published shortly.

⁴ Executive summary , WHO Joint External Evaluation of IHR March 5-9, 2018

⁵ Although it did not perform an in-depth analysis, the review also addressed the FIQCU control of fish exports, and recommended some amendments to the Fish Export Act, to re-define SBS as the Competent Authority (not the FIQCU), remove the current controls on non-EU exports, and restructure technical conditions.

7.3.2 Assessment of compliance with legislation

Food safety is addressed under the Food Act 2014 and provides powers to the Public Health Authority for food safety controls. The Public Health Authority (PHA) was established under section 3 of the Public Health Authority Act, 2013. It is an executive body under the Ministry of Health responsible for a range of functions such as environmental health, vector control HIV-Aids programmes, family health, housing, water and sanitation and includes food safety. The latter function is managed by a Food Control Unit, comprising 5 persons, with front-line controls implemented by Public Health Officers attached to about 70 district health centres. These officers are multi-functional (addressing all public health related issues). They have lists of registered premises but have no fixed inspection programme for food establishments in their district. The number of establishments is estimated to be 800-1000 Fishery Business Operators (FBOs).

The Act defines the powers of the PHA with regard to food safety, and requires food offered for sale to be safe for human consumption. All food establishments have to be registered with the Registration Department of PHA. Registration requires the Food Control Unit to approve the establishment and conditions. The Act also requires traceability systems to be in place and that food handlers are properly trained. Powers and duties of authorised officers (for example to enter premises, seize items, take samples for analysis) are defined and extensive.

Control measures (improvement, prohibition, and closure notices, as well as fines and imprisonment) are also set out clearly. The Act also sets up the Food Control Board as coordinating body recognising that other institutions also engage in food safety controls. Food safety regulations under the Act set out the specific technical conditions for compliance.

Importantly, Section 4 provides that the Public Health Commissioner may appoint any public officer or any other person deemed fit, to be an authorised officer for the purpose of the Act.

The Public Health Authority and the Seychelles Bureau of Standards have in 2023 signed a Memorandum of Understanding to foster increased collaboration and to promote development of food standards and utilization and assist with laboratory testing of food products. This is expected to considerably extend the technical resources available to the PHA for food safety testing (conducted by the Public Health Laboratory Service of the Ministry).

In response to regulatory controls over the safety of imported and exported food which are considered by the PHA to be generally weak (with the exception of fishery products) the Food Control Board has recently supported the development of the Food Act (Import and Export of Food) Regulations 2022 (still awaiting approval). When adopted these will require that import of high-risk foods (listed in the schedule, and including a wide range of fishery and aquaculture products but excluding meat which is addressed under veterinary legislation) be subject to a Food Importation Approval Document issued by the PHA. Similarly, all exported food products (with the exception of products covered by the Export of Fishery Products Act) must be produced according to HACCP principles approved by the Authority and meet current national regulatory or Codex Alimentarius standards.

In practice, inspection files and records are kept locally, nothing is centralised and there is no centralised database. There are no control plans for any sector of the food industry, sampling and testing is minimal, and except for specific instructions issued by the FCU, the Public Health Inspectors (who also deal with non-food safety matters) determine their work programme according to their district needs.

In conclusion, although the Seychelles has a functional legislative framework addressing most of the key aspects of food safety control, the official controls have insufficient resources for effective control of the domestic fishery product supply chain, which remains essentially unregulated.

Some functions, such as risk assessment, are however not addressed at all in the regulatory framework, although risk assessment work has been conducted by the PHA for some hazards in fishery products, such as heavy metals (in collaboration with foreign research organisations).

8 Operating costs and income of FIQCU

8.1 Expenditure

Budgetary appropriations for FIQCU in 2023 and 2024 (provisional) are shown in Table 2. Government of Seychelles (GoS) total annual expenditure on the Fish Inspection and Quality Control Unit service is estimated at about SCR 4 million annually (including personnel costs). Of this total amount, 97% is appropriated via the Seychelles Bureau of Standards budget. Operational costs have been supplemented in the past to a minor extent by Sectoral support under the Sustainable Fisheries Partnership Agreement (SFPA) (to about EUR 10,000 or SCR 140,000/annum).

Table 2: Budgetary appropriations from all sources for FIQCU 2023

SBS Budget line	Appropriation 2023 (SCR)	% of cost	Appropriation 2023 (SCR)
SBS P4. FIQCU Compensation of Employees	2,411,236.03	60%	2,493,000
SBS P4. FIQCU Use of Goods and Services	531,035.93	13%	676,000
SBS P4 FIQCU Goods and services (used for testing)	125,000	23%	
SBS P2. Costs of testing (disaggregated)*	803,288.00		803,288
SFPA Sectoral Support	140,000	3%	
Total	4,010,560	100%	3,972,288

**estimated by the consultant*

8.2 Income

Income is generated by the FIQCU in the form of fees for a) annual approval and b) issue of export certificates. The fee rates depend on the nature of the operator/individual requesting the services. The unit fees are set by a periodic Export of Fishery Products (Schedule of Fees) Regulations. The current schedules have been in place for several years and are currently subject to formal review; a proposal for a new schedule of fees is awaiting a decision from the Cabinet. The current fees, estimated revenue and proposed new fees and revenue are shown in Table 3:

Table 3: Estimated income to Treasury account from FIQCU control functions

Activity	Current Unit price SCR	2021		2022		New Unit price SCR	Future Income SCR
		No. of events	Income SCR	No. of events	Income SCR		
Non-commercial health certificate	75	747	56,025	3,179	238,425	100	317,900
Commercial health certificate for export of fresh, frozen, smoked fish by approved establishment.	250	213	53,250	267	66,750	400	106,800
Commercial health certificates for the export of canned tuna by IOT	112,500	643	112,500	528	112,500	216,000	216,000
Commercial health certificate for export of frozen tuna in bulk originating from non - Seychelles registered fishing vessels.	750	884	663,000	1,136	852,000	1,000	1,136,000
Commercial health certificate for export of frozen tuna in bulk origination from Seychelles registered fishing vessels.	300	569	170,700	618	185,400	500	309,000
Annual inspection and approval for Seychelles registered fishing vessels	12,000	13	156,000	13	156,000	15,000	195,000
Annual inspection and approval for establishments processing fresh and frozen fish and fishery products.	6,250	14	87,500	14	87,500	8,000	112,000
Annual inspection and approval for the tuna canning factory	18,750	1	18,750	1	18,750	25,000	25,000
Totals			1,317,725		1,717,325		2,417,700
<i>Note: Charge for export certification for canned fish is monthly (SCR 9,375 rising to 12,000 in future)</i>							

According to SBS records, cost recovery (in the form of fees for annual approvals and export certification) provided an income to the single Treasury account of SCR 1.3 million in 2021 and SCR 1.7 million in 2022 (short of the budgeted targets of SCR 1.8 and 2.3 million respectively). However, one should account for the COVID epidemic, which severely limited export activities, especially personal (i.e. non-commercial) exports.

If the proposed new fee schedule were to be applied to the 2022 level of control activities the income generated would be SCR 2.4 million.

8.3 Net cost to Government

Income data from the above estimates and the FIQCU annual and monthly reports indicate that in 2022 the service was on a net basis, 32% self-sufficient in 2021 and 42% in 2022. These figures may be considered as slight under-estimates since costs are based on higher 2023 staff budget costs.

Should the new pricing schedule proposed by SBS to Cabinet be implemented, then estimated income of SCR 2.4 million, would covers 60% of the current costs. In this case the annual net contribution of Government would be SCR 1.6 million.

The Seychelles' fish and fishery products in 2021 were estimated to account for SCR 4,996 million (92%) of total merchandise exports, with Europe being the primary market. The total operating cost of the FIQCU approximated to 0.08% of export value in 2022. Accounting for cost recovery from fees charged, the cost to Government accounted for 0.05% of the value of exports (0.03% with the new service pricing).

9 Constraints

9.1 Staffing

The FIQCU is staffed by:

- 1 manager with an appropriate professional qualification, (approaching retirement at the end of August 2024);
- 4 experienced inspectors (one senior) all certificate level plus *ad hoc* short courses
- 3 staff on issue of certificates (one senior) all certificate level plus *ad hoc* short courses
- 2 ancillary staff

All the staff have unique skill sets developed on the job, which they perform to utmost of their ability, in a thoroughly professional and dedicated manner. However, the human resource presents major limitations to the FIQCU, and is evident in several respects.

The most immediate and urgent staffing issue is the imminent loss of the head of the FIQCU in August 2024. Attempts by SBS to recruit a replacement for the retiring head of service were able to identify a suitable candidate (with relevant qualification and experience) but the salary offer was rejected. Immediate attention is required to ensure an adequate handover period.

The management capacity is insufficient to ensure that all the required tasks can be performed adequately. The absence of nominated Deputy Managers with defined responsibilities means that certain tasks (especially related to risk assessment and quality of inspection and laboratory testing activities providing information of risk management) are not fully addressed. Delegation of authority can also sometimes be problematic (causing delays in approval and certification, transmission of information). Additional management staff with a BSc or HND in Food Science, Food Technology, Food Safety, Quality Management or Veterinary Science are required to support

- a) scientific risk analysis;
- b) service quality management; and
- c) manage the inspection team and certification tasks effectively and efficiently.

Given the limited management resource the Head of the FIQCU is forced to qualitatively judge food safety risks within the fish export sector and allocate resources where they can be seen as delivering optimal value in terms of food safety and ensuring that export formalities (health certification and associated processes) flow as smoothly as possible. This means some tasks are performed only partially. In particular this means that supervision of vessel discharges are sub-optimal or in some cases not at all (e.g. Seychelles flagged industrial longliners transshipping remotely). Furthermore, the number of inspectors is insufficient to cover all levels of the supply chain to the extent necessary. There are insufficient inspectors for routine (daily) supervision of all landings at Providence, Victoria Quay and Ile du Port. Also, supervision of stuffing and sealing of containers is not fully covered.

None of the inspectors are appropriately qualified (e.g. in Food Safety/Quality Control/Environmental Health), although many have a fisheries related qualification (Certificate in Fisheries Science). Their capacities have been improved by in-service *ad hoc* training where available, but the approach is relatively unstructured and driven by availability (e.g. of donor funded initiatives) rather than needs (in the form of gaps in skills and knowledge). The relatively low pay associated with government service (estimated c.25% less than private sector) and limited career progression opportunities result in difficulty in recruiting and retaining good quality inspectors. Many good staff have left for private sector positions.

9.2 Laboratory testing

Laboratory tests undertaken by SBS on behalf of FIQCU are financed out of the SBS budget (to the value of about SCR 800,000 in 2022) and are accounted for internally. The level of testing is considered to be adequate for current needs. However, since these testing resources are consumed internally, they are not available for externally paid tests, and may be considered to be a loss to SBS. There is clearly a disincentive for the Bureau to extend testing since it directly reduces external earnings.

The technical competence of testing is very high, with most tests either accredited to international standards or well on the way. SWIOFish3 has supported with the supply of new equipment and upgrading facilities which will improve services to the fishery sector. The main issue with testing experienced by FIQCU has been the service level, in terms of delays (restricted allocation of testing slots to FIQCU) and long turn round times, which has in a few cases resulted in delays and in one case a costly recall of an affected consignments already despatched. The delays risk commercial or official rejections in the destination market.

9.3 Infrastructure

The FIQCU office was badly damaged in a fire in March 2022 which rendered the building unusable. The FIQCU has been operating from SBS Headquarters (HQ) at Providence since that time. The repairs are not yet completed and during the period of the consultant's field mission it was observed that there was no work on site at all. Repeated appeals for accelerated progress by the Head of FIQCU had no effect. As well as significantly decreasing the efficiency of FIQCU (temporarily re-located to SBS HQ, remote from much of the fisheries activity, and in unsuitable accommodation), this failure has caused a significant reduction in inspection and sampling rates (the current temporary office has insufficient facilities for sample preparation and storage). It has also caused delays and increase costs for operators (especially considering the current paper-based approach to certification requiring travel to SBS offices at Providence).

Although inspectors are required to work extensively at Victoria Quay, Providence, and Ile du Port sites, where there are daily landings, there are no office facilities at these locations. Similarly, there are no facilities for inspectors at the airport cargo terminal.

9.4 Weak budgetary support

It is evident that the resource base for the FIQCU is insufficient for many of the tasks which it is required to perform. This is evident in operational expenditure, particularly in staffing levels, attractiveness of salaries, and in-service training of staff. It is also evident in terms of lack of a development budget for investment in capital items such as provision of vehicles and equipment for inspectors, development of a software system, and adequate office facilities (Headquarters, as well as office accommodation at important landing sites).

The importance of the FIQCU, in sustaining 96% of merchandise exports may well be recognised by the SBS management and its parent Ministry of Investment, Entrepreneurship & Industry, but the above limitations demonstrate that, due to financial constraints, this is not fully reflected in the actual budgetary priorities adopted by these bodies.

Ensuring the sustainability of the FIQCU and its functionality may be considered to be one of the most important tasks of the Ministry. However, these constraints have meant that in recent years both short-term needs (repairing the office, recruiting a replacement head of unit) and long-term needs (ensuring human resource development, investment in software and port offices) have not been sufficiently addressed.

10 Performance of the control tasks

10.1 Output of the FIQCU

According to the annual report for 2020 (the last year for which data is available), in that year the unit's output was as follows:

- 54 in-depth inspections undertaken (vessels, landing sites, establishments)
- 247 export containers inspected
- 1,324 samples taken and tested (607 histamine, 46 heavy metals, 50 fishmeal, 560 micro surface swabs, 61 water and ice)
- 3,288 export certificates issued
- 6 containers of tuna condemned

All imported consignments are inspected and sampled. Inspections of freezer vessels, cold store and establishments are all done well, frequently and to a reasonable standard. Non-freezer vessels are also inspected annually, and good records kept. Exporters may only receive product for export from such vessels.

10.2 Gaps in the service

10.2.1 European Commission audits

DG Health and Consumer Protection of the European Commission performs periodic onsite audits of third country Competent Authorities to assess their capacities to perform controls in line with EU

legislation. The latest for the Seychelles was in November 2018⁶. Five action points were recommended as a result of this report, as set out below.

1. The Competent Authority should ensure that EU listed facilities source raw materials for the production of fishery products for EU exports from primary production fishing vessels that are registered in accordance with Article 6 of Regulation (EC) No 852/2004 and that comply with Article 12(2)(a) and (b) of Regulation (EC) No 854/2004.
2. The Competent Authority should ensure that all freezer vessels involved in the production chain for tuna fishery products for EU export comply with the applicable EU standards, in particular, with Chapter I(I)(C)(1), of Section VIII, of Annex III to Regulation (EC) No 853/2004 when exporting frozen products at no more than -18°C and destined for other purposes than canning.
3. The Competent Authority should ensure that facilities producing fish oil for human consumption comply with applicable EU standards, in particular, those contained in Article 5 of Regulation (EC) No 852/2004 and Chapter IV(B)(1)(b) of Section VIII of Annex III to Regulation (EC) No 853/2004.
4. The Competent Authority should ensure that, in the framework of official controls, and as required in Chapter II(D) of Annex III to Regulation (EC) No 16 No. Recommendation 854/2004, includes in the monitoring arrangements to control the levels contaminants sampling and testing of fish oil to control the levels of dioxins and polychlorinated biphenyls considering the sampling rules of Regulation (EC) No 2017/644 and the limits defined in Regulation (EC) No 1881/2006.
5. The Competent Authority should ensure that the rules and principles applied by certifying officers align with those laid down in Directive 96/93/EC; in particular, that these officers only certify data of which they have personal knowledge or which they can ascertain, and that they certify products that are still under their control (Article 3(2) and (3) of Directive 96/93/EC).

The CA was able to establish a plan of corrective actions to address these issues, subsequently approved by the European Commission and implemented by the FIQCU. The implementation has not yet been audited by the Commission.

10.2.2 Border rejections

Generally, Seychelles exporters have not experienced significant problems with border rejections, with only 8 border rejections on entry into the EU in the 3½ years since 2020. Five of these were caused by

⁶ Final Report of an Audit Carried Out in The Seychelles from 21 November 2018 to 23 November 2018 In Order To Follow Up on The Audit DG(SANTE) 2017-6003 To Evaluate The Control Systems In Place Governing The Production Of Fishery Products Derived From Tuna Species Intended For Export To The European Union, European Commission Directorate-General For Health And Food Safety, DG(SANTE) 2018-6784. See <https://ec.europa.eu/food/audits-analysis/audit-report/details/4137>

post-export breaks in the cold chain, which are outside the CA controls. Certification errors account for two of the rejections.

Table 4: EU border rejections on fishery products imported from Seychelles 2020-2023

Rupture of the cold chain in frozen tuna	17-06-2022	Spain
Not valid sanitary certificate for <i>Thunnus albacares</i>	14-06-2021	Spain
Not valid sanitary certificate for - <i>Makaira indica</i> ; <i>Katsuwonus pelamis</i>	14-06-2021	Spain
Mercury in chilled fillets of swordfish	02-11-2020	France
Rupture of the cold chain caused by damaged containers	25-09-2020	Spain
Rupture of the cold chain in brine frozen tuna	05-06-2020	Spain
Poor temperature control of swordfish and tuna loins	03-06-2020	United Kingdom
Poor temperature control in frozen stripe-bellied bonito (<i>Katsuwonus pelamis</i>)	20-01-2020	Spain

Source: European Commission, RASFF system

10.2.3 Other issues

However, the EU exports rejections are not the only indicator of FIQCU performance. In discussions and reviews with the SBS the consultant has identified a number of additional issues of concern.

Seychelles flagged industrial longliners tranship elsewhere and are not subject to any sanitary controls whatsoever by the FIQCU. A major task in the short term will be to ensure that these meet the standards set by the regulations under the Export of Fishery Products Act 1996 (since landings by Seychelles flagged vessels in foreign ports are considered to be exports).

Inspection protocols are criticised by some operators are being too low level (focusing on non-critical non-compliances such as hygienic construction rather than a scientific hazard and controls-based approach). This complaint is most likely a consequence of insufficient qualified and experienced inspectors who lack the professional confidence to focus on the invisible science of hazards and controls, rather than observable visible physical defects.

Few landings from the small-scale sector are attended, and only a proportion of landing events from semi-industrial and industrial vessels are supervised.

With regard to foreign flagged vessels, FIQCU has no authority to board for inspection. Their products are inspected if it is being landed ashore or transhipped into containers. If direct transhipment to bulk reefer vessels, the FIQCU does not control the process and does not issue health certificate. EU procedures provide for this to be signed by the duly authorised Captain of the vessel.

In 2021 there were 2,549 export certificates issued for commercially exported containers of fishery products. At the 2020 inspection rates, it suggests that only about 10% of export consignments are subject to inspection. If canned fish are excluded, this rises to about 15% of consignments. There are simply insufficient resources to ensure a check at all container loadings, thus relying on the exporter. Of course, the checks are undertaken on the basis of risk, but even reputable exporters appreciate the presence of an independent inspection to confirm all is compliant.

The export certification process employed by the FIQCU attracts criticism from numerous operators interviewed by the consultant. The FIQCU and most of the major exporters use the EU TRACES for EU exports. This is the European Commission's online platform for sanitary and phytosanitary certification required for the importation of animals, animal products and food and feed into the European Union. Certification requests, validation and issue are all undertaken electronically. However, the nature and extent of the validation process can vary. The process is very time sensitive, since certificates must be completed before departure of the vessel or aircraft. In some cases, no checks are made, in others they can be substantive and include sampling and testing of consignments. The main objective of TRACES is to streamline the certification process and all linked entry procedures and to offer a fully digitised and paperless workflow. Although TRACES is paperless CAs in EU Member State destination countries all still require production of an original certificate signed and stamped by the CA in exporting country. FIQCU is in the process of enabling digital signatures to remove the need for issue of a printed original certificate.

However, for non-EU exports, SBS requires operators to submit a written request for certification, following a template, along with packing list, consignee details, all of which are transposed by FIQCU into a draft certificate (paper) which has to be transmitted to the operators for checking. Typographical errors in the operator's request and in the transposition of data by FIQCU. Also, the nature of the business is that the content of consignments and packing list can change at the last minute. All of this leads to several time-consuming iterations, each requiring a physical journey by the operator to deliver and pick-up documents.

One of the key gaps in this process is that the certifying officer does not have a ready source of reference data for validation (e.g. most recent inspection reports of the establishment or vessel, list of outstanding non-compliances, laboratory test results from last round of sampling) which could determine the certification decision. Whilst this information exists within the FIQCU much is paper based, or in separate computer files in MS Word or Excel. It is not therefore readily available for use. There is a need for a centralised CA database which would provide the evidence for the veracity of the attestation signed by the certifying officer. Such a software system would also provide for online request and certification for non-EU exports (still all performed manually), and for e-signature and online certificate database which would facilitate communication and increase security.

11 Capacity building requirements (short term)

In the short term, a number of urgent measures are required to ensure the continuity of service of FIQCU. In summary, the following is considered to be a minimum to maintain an appropriate level of service in the short term. Some of the actions should be prioritised for immediate action (initiated in less than 6 months) to ensure adequate continuity of service.

Table 5: Current resources and short-term requirements for FIQCU

	Current resource 2023	Proposed resources required (2024)
Operational		
Technical managers	1 (retiring)	1
Deputy managers	0	2
Inspection staff	5	7
Certification staff	3	3
Service staff	1	3
Lab testing by SBS (SCR 000)	800 ¹	1,000
Operating budget (SCR 000)	800 ²	1,000
Investment		
Vehicles	1 (+1 ordered)	4
Inspection equipment (kits)	0	4
Office HQ	1	1
Offices at Landing sites	0	2
Software system (SCR 000)	0	500

¹ funded internally from P2 testing budget

² includes about SCR 145,000 from SFPA Sectoral support.

11.1 Head of Service

Due to the foreseeable retirement of the head of service in 2024, it is advisable in the short term to identify a suitable budget and recruit an interim replacement of a high calibre. The individual should have a scientific degree in a relevant discipline (e.g. food science, food safety, veterinary science, environmental health) ideally with experience of the processing and distribution of fish products. A suitable salary band should reflect the high level of competence and responsibility, as well the salary bands available within the institution hosting the FIQCU function. Recruitment should allow for sufficient time for handover of from the current Head.

11.2 Senior managers

Food safety risk management could be significantly improved in the short term by recruiting two deputy managers; one would manage the inspection team and certification (including in-service

training and capacity building of inspectors), the other would engage on the science (risk analysis) and ensure the quality of the service with a focus on hazards, the CA's control system, ISO17020 certification and procurement of laboratory testing services. Either would be able to deputise for the Head of Service. They should have a scientific degree in a relevant discipline (food safety, veterinary science, environmental health) ideally with experience of the processing and distribution of fish products. Recruitment should allow for sufficient time for handover from the current Head.

11.3 Inspectors and Certification staff

Additional front-line inspectors are required to allow for an extended supervision of vessels and discharge events. These activities are currently (and correctly) focused in the purse seine sector, which presents some of the greatest risks. However, many discharge events (from semi-industrial and small-scale operators) are not supervised, and controls are insufficient and arguably not in line with EU requirements. At least 2 more inspectors are recommended to be recruited in 2024 to address this gap in the service. They should have a relevant technical qualification (e.g. Diploma/BTEC level in fisheries or public health with experience of the fishery sector).

Salary scales for the most experienced inspectors may need to be revised and increased. A nominal 25% increase would bring them more into line with private sector.

In the short term, one more staff member in the certification team is required to improve effectiveness of the service and ensure a faster and more accurate service. The certification unit is already run by a senior inspector, and the main qualifications for additional staff are good IT and administrative skills.

11.4 Service staff

A driver and two technical assistants to support sampling, preparation and delivery will be useful. Two extra staff will be required.

11.5 Laboratory testing budget

The SBS laboratory is nominated as the official testing laboratory for FIQCU. The current level of testing undertaken by the SBS testing laboratory is acceptable. However, there is no available resource to support a desirable extension of testing to address some of the gaps e.g. Listeria on tuna loins or cold smoked fish (which may be considered ready to eat products), or in case of need for additional investigative analysis in case of a European Union Rapid Alert System for Food and Feed (RASFF) incident, nor to support increased supervision of a HACCP plan implementation.

In addition, certain tests (e.g. dioxin and PCBs) which must be undertaken in a foreign laboratory were disrupted in 2020, although testing services were re-established in 2021 onwards. A 25% increase in budget for testing in 2024 is recommended to address these requirements.

Furthermore, and perhaps more importantly, turn round time is too long and due to demand exceeding capacity, the responses of the SBS laboratory to non-scheduled testing needs of the CA cannot be prioritised. The CA should in future be free to explore the procurement of testing services from other suppliers with the required quality of service, which at a minimum must be implementation of ISO/IEC 17025 on "General requirements for the competence of testing and calibration laboratories".

11.6 Operational costs

The operational budgets (under SBS budget line P4. Use of goods and services) are currently fully utilised and will need to be increased to accommodate any expected increase in inspection activity, although there could be some efficiency savings made by use of e-certification and strengthened food

safety risk profiling of establishments. An increase of the budget is recommended in the medium-term is recommended.

11.7 Capital investment

Headquarters office repairs are already budgeted and underway, but they should be accelerated and finished immediately. This is an urgent short-term priority.

Office space at Providence fishing port was offered by the SFA but has not been extensively used due to lack of staff resource to provide daily coverage. There is no quayside office at the Ile du Port harbour.

To make up for under-investment in the CA capacities there is a need for additional short-term injection of capital investment to finance:

- 2 additional vehicles
- 4 sets of inspection equipment (probes, water test kits, protective clothing, sampling equipment, portable electric drills, saws, ice boxes etc)
- 1 containerised inspector offices (at Ile du Port)
- An IT system with the aim of a) recording findings of inspections and sample testing; b) providing a portal for certificate management; and c) generate reports.

Currently all data from inspection and testing is generated by hand on paper and transferred to individual computer files. The need for an electronic portal for certification of non-EU exports is clear, to avoid the current time-consuming re-typing and movement of paper documents, reduce errors and to improve certificate security. The system should be capable of interfacing with the TRACES system. Issued certificates should be available online to operators and their clients. A new IT system should provide a means for the introduction of storage and retrieval of data concerning establishments and fishing vessels, show the results of inspections and sampling and testing exercises, and provide periodic report generation. Ideally, it should also be capable of linking to the planned SBS Laboratory Information Management System (LIMS). A custom designed system with cloud data storage is proposed, which will need to be specified in line with the above requirements and costed. A nominal investment of SCR 500,000 is proposed at this stage to commence development.

11.8 Budgetary implications of strengthening FIQCU capacity

The key areas of strengthening proposed are:

- Recruitment of a new Director and two deputies
- Increased Laboratory testing budget
- Recruitment of additional inspectors
- Increased Operational Costs
- Capital investment (2 vehicles, inspection equipment, containerised office at Ile du Port, IT system and equipment)

The estimated budgetary implications of strengthening the capacity of the FIQCU are shown overleaf in Table 6, which (based on the assumptions in Table 7) shows that to ensure delivery of a strengthened service in 2024 to meet current needs only, would require an operating budget of SCR 3.9 million in personnel and SCR 2.0 million in operational budgets (including testing).

The proposed 2024 SBS appropriations for FIQCU amounts to SCR 4 million (with no investment) as shown in Table 6. This represents only a minor increase on the 2022 position and is clearly insufficient to meet the level of service which FIQCU should be delivering.

The proposed 2024 appropriations under the SBS budget will therefore not meet the short-term needs of the FIQCU, whether in personnel, operating budgets or investment allocations. The overall shortfalls are approximately SCR1.4 million in personnel costs and SCR 0.5 million in operating costs. In addition, the CA is estimated to require about SCR2.2 million in investment in the short terms to allow it to maintain and improve the quality of technical service. However, there is no investment budget provision in the 2024 appropriation.

Table 6: Estimated budget requirements for strengthened FIQCU

	Means		Costs SCR		
	Requirements	Unit cost	Annual Cost	2024 SBS budget appropriation	2024 shortfall
Personnel costs			3,852,000	2,493,000	1,359,000
Director	1	540,000	540,000		
Deputy directors	2	396,000	792,000		
Inspection staff (median salary)	7	216,000	1,512,000		
Certification staff (median salary)	3	192,000	576,000		
Service staff	3	144,000	432,000		
Operational costs			2,000,000	1,479,000	521,000
Lab testing by SBS*	1,000,000	1,000,000	1,000,000	803,000	
Operating budget	1,000,000	1,000,000	1,000,000	676,000	
Investment			2,216,000	0	2,216,000
Vehicles	2	700,000	1,400,000		
Inspection equipment (kits)	4	29,000	116,000		
Office HQ	0				
Containerised offices at Landing sites	2	100,000	200,000		
Software system (SCR 000)	500,000	500,000	500,000		
TOTALS			8,068,000	3,972,000	4,096,000

*estimated (accounted internally);

Table 7: Assumptions for budget requirements for FIQCU

Assumptions - Unit costs	Unit	SCR
Salary Director	SCR/Month	45,000
Salary Deputy Director	SCR/Month	33,000
Inspector*	SCR/Month	18,000
Certification*	SCR/Month	16,000
Service*	SCR/Month	12,000
Vehicle	Unit	700,000
Inspection kit	Unit	29,000
Containerised office	Unit	100,000
Software	Unit	500,000

**estimated median (accounting for salary and allowance)*

11.9 Sources of finance for short-term capacity building

Given that at the time of writing, the 2024 budgets for the Ministries concerned are in the process of being finalised, it appears that irrespective of any policy decision to the contrary (based on the options provided below), the FIQCU will have to operate under the foreseen budgetary appropriation for SBS for 2024, as shown previously in Table 2.

Discussions with the Ministry of Fisheries and Blue Economy and the Seychelles Fishing Authority have indicated that some immediate expenses for the upgrading and capacity building of the FIQCU could be supported by the Sectoral Support programme of the EU-Seychelles Sustainable Fisheries Partnership Agreement (SFPA). A budget for the SFPA sectoral support to the capacity building of the CA was therefore proposed by the consultant.

The justification for an allocation from the sectoral support programme would be strengthened risk management and restructuring and augmentation of inspection of vessels and landings. The amount proposed corresponds to about 3% of the EUR 2.8 million earmarked for the support of the fisheries policy of Seychelles.

Ideally the Service Contracts should be foreseen for two years, during which time a new institutional framework for the service should be implemented, allowing for the issue of permanent contracts. Elements which cannot be financed in the 2024 may be considered for inclusion in GoS budget appropriations in 2025, or for addition to future tranches of the SFPA Sectoral Support, with the prospect of a further contribution in the future.

Table 8: Proposed SFPA sector Support for capacity building of FIQCU 2024

Item	No. required	2024 Amount (SCR)	2024 Amount (EUR)
Operational costs			
Service Contracts	1	600,000	41,400
Capital investment			
Equipment for port inspection and testing services:			
• Inspection equipment (kits)	4	116,000	8,000
• Software system (inspection and certification)	1	500,000	34,483
Total		1,216,000	83,883

12 Capacity building requirements (medium term)

12.1 Future expected fishery sector developments

12.1.1 Investments in processing and export capacity

Additional capacity in terms of fisheries infrastructure to meet global market demand is being considered by the GoS and private sector investors in the following areas. In some cases, the investment plans are well advanced. These developments need to be considered in the future allocation of resources to the control tasks performed by the FIQCU.

- Zone 14 port extension: this will extend capacity for landings by industrial fishing vessels and include some specific facilities to support longline vessels (not currently available) with an expected 100 port visits/year, discharging of Ultra Low Temperature (-70 °C) frozen high value tunas and other large pelagic fish.
- Zone 14: Six investments in additional processing establishments (plus three existing operators proposing to move into expanded premises). A review of the business plans submitted by these operators suggests that this will add an estimated 67,000 tonnes of processing and export capacity. This is equivalent to 3,350 containers of 20 tonnes each, potentially doubling the current number of export certification events). This is considered (by the MFBE) to be an optimistic upper limit and the total throughput is likely to be less due to resource limitations. However, despite this note of caution, a significant increase in workload of the CA is expected in the medium term.
- New facilities for the export storage of chilled products at Mahé airport to ensure preservation of the chill chain, which will need sanitary supervision. This is expected to increase the flow in fresh chilled fish exported by air.

12.1.2 Domestic controls

Under the terms of the Food Control Act 2014, the safety of food products on the domestic market are the responsibility of the Public Health Authority of the Ministry of Health. Risks are managed by a Food Control Unit (5 staff), with front line controls implemented by c.70 District Public Health officers operating from District Health Centres. An MoU was signed in June 2023 between the Public Health Authority and SBS to provide for improved communication and sharing of testing services but does not address inspections.

Controls on food safety of imported food products are also regarded as weak to non-existent (other than for meat with controls undertaken by the Veterinary Department of the Ministry of Agriculture). A new regulation (Import and Export of Food Regulation) developed under the Food Control Act will provide the Ministry of Health with increased powers to regulate the import and export of high-risk food products (as defined in the schedule). This includes processed fish and fish products, including molluscs, crustaceans, and echinoderms.

The FAO is assisting the Ministry of Health to undertake a capacity assessment using the Food and Agriculture Organisation (FAO)/World Health Organisation (WHO) Food Control System Assessment tool. The process was launched in November 2022. The FIQCU and the SBS participated fully in this process with regard to fishery sector controls. A report is not yet available. The process is likely to lead

to capacity building and structured policy reforms to the way in which the legal and institutional basis for food safety controls are managed in the Seychelles.

In the meanwhile, due to a lack of resources and policy attention, the domestic controls on the fishery sector are recognised as weak. Key issues identified are:

- Poor sanitary conditions and controls in the domestic distribution system e.g. uncontrolled road side display and sale of fish
- A substantial number of operators are not registered with the Public Health Authority; there is no formal data but trade sources have estimated 75% of fish on the domestic market (including supplies to hotels) is not distributed by authorised operators. More detailed study would be required to confirm this claim.
- Fish which is rejected by processors as not meeting safety and quality standards (for both domestic and export markets) is re-directed by fishers via unofficial domestic channels
- Insufficient resources for testing (one chemical and one microbiological test/week for the control of all foods)
- Aquaculture shrimp produced on Coetivy is sold without any approval from the PHA; there are no official additive or residue checks undertaken and there is no information provided to the Food Control Unit regarding the facilities in which it is processed.
- Poor communication with FIQCU concerning problems in common supply chains – a ciguatera outbreak in 2022 was not communicated in a timely manner to FIQCU, in spite of the affected species being one which is commonly exported; luckily the outbreak was localised and there were no exports of the affected species in the period.

Given the reliance on food safety for both domestic and export on common fishery product supply chains, there are strong arguments for establishing a common control system to improve coherence within the regulation of the fishery sector serving all markets. This would have the advantage of providing a framework for the harmonisation of domestic and export food safety standards in the fishery sector, a very worthwhile objective.

The Public Health Commissioner has the power under Section 4 (1) of the Food Control Act power to authorise any public officer or other person as an authorised officer under the Act. Discussions with the Commissioner suggests that there would be no objection to authorising inspectors of another Ministry, whether from SBS or MFBE, under the Act. The tasks of inspection and control of this sector in the future may therefore need to be considered in the medium term as being met by the Competent Authority. The detailed terms of the arrangement could be established within an MoU (addressing scope of authorisation (activities), annual planning and reporting, consultation on non-compliances etc.). Future resource planning would also need to consider the option of the CA taking responsibility for domestic market controls.

12.2 Longer term outlook for FIQCU operations

The organisation structure and functions of the FIQCU were established in the mid-1990s, when the fish export sector comprised IOT and 2 or 3 processing establishments. Since then, these operators have expanded the range of products. Additional export processing operations were introduced (now numbering 14 units requiring inspection and approval, some involving very modern processing technologies e.g. cold extraction of fish oil, and high risk products (histamine producing species, low-acid canned foods and ready to eat products). Furthermore, in 2004, the EU extended HACCP requirements and controls on fishing vessels and landing sites. It is clear that the FIQCU must adapt to the changing dimensions and nature of the fish export sector as well as SPS conditions applied by

importers, which implies a constant state of review and response (in terms of changes to the dimensions and activities of the control system). Until now, the FIQCU has managed to keep pace with the dynamics of the sector, but at a cost of compromising on some of the tasks. However, if the future sectoral plans of the Government are realised to consolidate Seychelles as a regional tuna hub, it is expected that there will be a substantive increase in demand for services, which should be accounted for in planning.

It is therefore helpful to consider a longer term (10 years) vision for the FIQCU as a fully independent and fully compliant food safety inspection and control service addressing all levels of the supply chain for the production and distribution of fishery and aquaculture products. Such a service could demonstrate the following features:

1. An Independent authority, or based in such an authority, operating under the Ministry responsible for fisheries
2. Financed by a regular budgetary appropriation from Government, and fees from fishery operators, in the form of annual approval and certification fees, as is done at present (with a targeted minimum of 50% cost recovery target)
3. Director engaged in management of service performance, policy & strategic planning, international relations
4. Two Deputy Directors engaged in management of service implementation, performing functions of:
 1. management of field teams: implementation of inspection procedures, sampling, reporting, export certification
 2. science (risk profiling, risk assessment, sampling procedures, contracted laboratory testing, inspector training)
5. A team of sufficient field inspectors to meet demand, each with a minimum qualification to BSc level in public health, veterinary science, food safety, microbiology, toxicology, food science, food technology.
6. Inspectors to be equipped (vehicles, inspection equipment, protective clothing etc)
7. Annual risk-based inspection and sampling plan in place with following objectives met:
 1. All Seychellois flagged freezer vessels and semi-industrial vessels subject to controls
 2. Vessels, landings sites, and distribution for domestic (including tourist) market subject to controls
 3. Full-time supervision at discharge of industrial and semi-industrial vessels
 4. Periodic supervision at discharge of small scale vessels
 5. All distribution/processing establishments (including for domestic market) subject to risk-based inspection programme
 6. Monitoring plans implemented for marine capture fisheries and aquaculture
8. Fully digitised (paperless) system for data capture from control actions, inspection reports, test results, to include certification module (non-EU) and report generation and links to EU TRACES NT and SBS lab information management system
9. Enhanced public/sector profile (new name, position title, PR function, website, social media)

A key task of senior management is to ensure that the activities of the CA reflect any sectoral developments, so that risks of export of non-compliant fishery products are minimised. Flexibility in the reallocation of scientific and staff resources is an essential feature of the service.

In the longer term, there is also likely to be a need to provide additional HQ accommodation for the CA, either through extension of the current building, or by allocation of land and construction of a new facility (e.g. at Zone 14 would be ideal). There may also be a need to address aquaculture with dedicated control resource. Neither of these longer-term costs are quantifiable at this stage, and they are not accounted for in the analysis of the medium-term resource requirements below.

12.3 Future CA resources required (short/medium term)

In the medium to long term, to commence steps towards the above vision, the following Table 9 shows the estimated resources required by FIQCU to meet the known medium term future demands for additional services, to reflect the needs of expected fishery sector investments, and extension of controls to the domestic market.

Table 9: Estimated resources required by FIQCU in the medium term

	Current needs 2024	Additional medium-term needs		Costs SCR			
		Zone 14 and supplying vessels	Domestic market	Total required	Estimated unit cost	Total annual cost	Subtotal
Personnel costs							7,068,000
Director	1			1	540,000	540,000	
Deputy directors	2		1	3	396,000	1,188,000	
Inspection staff	7	6	2	15	216,000	3,240,000	
Certification staff	3	2		5	276,000	1,380,000	
Service staff	3	1	1	5	144,000	720,000	
Operational costs							3,200,000
Laboratory testing	1,000,000	500,000	200,000	1,700,000	1,700,000	1,700,000	
Operating budget	1,000,000	500,000		1,500,000	1,500,000	1,500,000	
TOTAL ANNUAL							10,268,000
Investment							2,216,000
Vehicles	2	1	1	4	700,000	1,400,000	
Inspection equipment (kits)	4	2	1	7	29,000	116,000	
Office HQ	0						
Containerised office at Landing sites	1	1		2	100,000	200,000	
Software system´ (SCR000)	500,000			500,000	500,000	500,000	
TOTAL INVESTMENT (MEDIUM TERM)							2,216,000

It is therefore quite foreseeable that the FIQCU should expand in the medium term (possibly within 5 years) to a body with 29 or 30 staff (at an annual personnel cost of SCR 7.0 million) and an operating budget of SCR 3.2 million/year, of which some SCR 1.7 million would be spent on laboratory testing services (at current prices). This total of SCR 10.3 million excludes indirect costs in the form of overheads in terms of administrative functions (secretarial, accounting and HR) to be sustained by the host institution.

Based on historic rates, a minimum target rate of 50% cost recovery is proposed as reasonably sustainable over time. With such a recovery rate, the net cost to the Government of Seychelles in the medium term (at 2023 prices) is expected to be in the region of SCR 5.2 million/year. At 2020 levels of export, this represents 0.1% of the value of fish exports. Due to the expected future increase in exports volume and value, the actual relative cost is expected to be lower than this. In future it may be considered reasonable that net GoS expenditure (costs less income) on these services should be maintained at about 0.06-0.08% of annual export value.

13 Future scenarios for the institutional framework

13.1 Outline of scenarios

Various feasible scenarios for the institutional framework for the Competent Authority function may be considered. Each has various characteristics which should be taken into account in any policy decisions concerning the future institutional location of the Unit. The scenarios recommended to the GoS for consideration are set out in Table 10 below.

Table 10: Institutional scenario options for FIQCU location

Scenario name	Ministerial responsibility	Parent organisation	Legal personality
1. Status quo (SBS)	Investment, Industry and Entrepreneurship	Seychelles Bureau of Standards	Technical Unit
2a. MFBE Direct	Fisheries and Blue Economy	N/A	Technical Unit
2b. Seychelles Fishing Authority Unit	Fisheries and Blue Economy	Seychelles Fishing Authority	Technical Unit
2c. Independent Authority	Fisheries and Blue Economy	N/A	Agency/Authority

It should be noted that the future FIQCU functions do not include management of laboratory testing. **In all scenarios it is strongly recommended that laboratories remain external to the FIQCU**, and that a budget is allocated for the purchase of the testing services from designated services providers. These providers will include SBS but could also include other national testing services such as SOCOMEP (approaching accreditation of AAS heavy metal testing) and ORTUS laboratories (which is planning new investments in HPLC for histamine and IPC-MS for heavy metal testing), as well as overseas laboratories where appropriate. One of the new positions in the CA should be tasked with ensuring optimised purchasing of testing services.

Control actions such as approval and certification cannot be delegated by the CA. However, as well as laboratory testing, other front-line services (sampling and inspection of establishments and vessels) may be contracted out. However, EU regulations require that all such services be accredited to the ISO/IEC 17024 standard. They would still have to be paid for from income, and service contracts managed effectively, and the performance of the service would be equally scrutinised for technical compliance by the DG SANTÉ.

At present, FIQCU staff undertake inspections in foreign ports of Seychellois flagged vessels which operate remotely, with costs such as travel charged to the operator. In future, contracting an inspection service provider could be considered for remote inspections of already approved vessels. Similarly, regulations also consider that such vessels could also be inspected by the CA in the port of discharge (providing that the country is EU approved). Bearing in mind that many Seychellois industrial longline freezer vessels have not been inspected at all and may need to be brought within the control system, these options could present opportunities for cost savings in future and will need to be investigated in more detail when the demand arises. At the appropriate time, international inspection and certification bodies could be requested to provide quotations. The management decision is essentially one of “make or buy” and can be determined on the basis of cost effectiveness. Such an approach could be implemented under any of the scenarios described below.

13.2 Scenario 1: Status quo (SBS)

This scenario reflects the current situation of FIQCU being located as a unit within the SBS, and all its features:

- **Insufficient budget appropriation** from the Ministry of Investment, Entrepreneurship & Industry, to ensure sufficient and flexible GoS resource are allocated in a timely manner. The Ministry has other important policy priorities (notably economic diversification) which may sometimes appear to be prioritised.
- **Salaries remain fixed to Government pay grades** and are not conducive to recruitment and retention of well-qualified staff at all levels
- **Compulsion to use SBS laboratories** ties testing to an overloaded testing service with insufficient responsiveness and flexibility to meet the needs of the CA (delays in getting test results)
- **No specific budget appropriation for testing** – budget costs not transparent
- **Fixed fee structure (determined by regulation)** limits potential for use of financial incentives for compliance (e.g. higher fees for persistent minor non-compliances)
- **Income generated from the FIQCU activities is paid into the Treasury account**
- **No changes will be required in legislation**
- **No conflicts of interest**
- **Overheads will continue to be supported within the SBS cost structure.**
- Whilst substantial additional budgetary commitments must be made for the sake of ensuring a future effective service, along with scenario 2, this scenario has the **lowest operating costs** for the GoS.
- **No transition costs.**

13.3 Scenario 2 FIQCU within the fisheries mandate

There are three possible scenarios within the MFBE, as indicated above. All possess the features that:

- **Ongoing policy support would be guaranteed**, thus ensuring access to greater and flexible GoS resources to meet evolving needs of the fishery and (developing) aquaculture sector.
- **Easier access to sectoral budgetary support under SFPA** (for capital items) e.g. to limit administrative lag in meeting financial needs from force majeure, and changing nature of fish exports
- **Improved coherence within fishery sector services:** ability to complement support activities of PDQA of SFA with FIQCU technical knowledge e.g. strengthen content of SFA's Technical assistance and training for operators. Also, to develop directed R&D for risk assessment functions (not performed at present)
- **Possibility to address domestic sector safety standards** by applying regulatory standards (in place, but not enforced by PHA), and a matter of concern for the MFBE
- As well as all other costs, the **testing services would need to be budgeted in the MF&BE appropriations**, but the FIQCU would be free to purchase testing services from service providers other than SBS. However, when using SBS labs the FIQCU may not be able to retain even the current priority of service level.
- **Changes will be required in legislation** (both the Export of Fishery Product Acts, the draft Fishery Act and potentially the Draft SFA Establishment Act) to ensure that appropriate mandates and powers are defined.

The different scenarios within the MFBE may be considered as follows:

13.3.1 Scenario 2a: FIQU as a Department of the MFBE

- **The MFBE is focused on policy rather than executive decision** making, and has limited capacity for technical management of the FIQCU
- **Salaries would remain fixed to Government pay grades** and the MFBE would be likely to experience the same problems as SBS in terms of recruitment and retention of well qualified staff
- **Income generated from the FIQCU activities would be paid into the Treasury account.** There would need to be a budgetary appropriation to cover the full costs of operations.
- **Administration, HR and finance functions may be supported within the relevant departments** of the Ministry.

13.3.2 Scenario 2b: FIQCU as a Department within Seychelles Fishing Authority

- There would be **greater flexibility in salaries**, allowing improved terms for recruitment and retention of well-qualified staff
- **Governance structure would be more relevant** (FIQCU would be responsible to the SFA Board representing fishery sector interests, rather than SBS Board - not sector specific)
- **Additional and flexible sources of finance** can be made available through retention of income generated by FIQCU by SFA (as an autonomous authority) and improved access to sectoral support funding under the SFPA for capital investments

- However, FIQCU activities are not likely to generate sufficient income to cover costs (50% recovery is considered feasible over time) and there **would need to be a financial accommodation with Government** to ensure that Government continues to cover the balance of costs of service (considered as a public good). This could be through either:
 - a) maintaining the current budgetary appropriation (c.SCR 4 million), but paid to SFA via MFBE
 - b) adjusting the dividend paid by SFA to Government to reflect the costs of the service⁷

- **Changes will be required in legislation** (amendment of the Export of Fishery Product Acts, the Draft Fishery Bill and the Draft SFA Establishment Bill).
- **FIQCU overheads (administration, HR and finance) may be defrayed** within the relevant departments of the SFA
- There are **concerns expressed regarding a potential risk of conflict of interest** between the functions of the FIQCU as an enforcement body, and the functions of the SFA as an operator providing services in the export supply chain – ice, landing site management and technical advice, including on compliance issues. In considering this issue, the follow may be taken into account:
 - SFA performs other regulatory and enforcement functions in the sector such as fisheries MCS without conflicts arising;
 - SFA is not a fishery business operator, although it provides some service inputs to FBOs.; it has no direct activities in fish supply;
 - In the case of SFA owned establishments leased to operators, responsibility for sanitary compliance is always on the fishery business operator (i.e. the lease-holders);
 - SFA does not operate infrastructure/facilities which are subject to the CA’s specific approval in law (freezer or factory vessels, cold stores or processing plants);
 - The risk of the Board of SFA refusing to correct a non-compliance at these SFA facilities and identified by its own CA function is considered to be *de minimis*;
 - the model (a fisheries administration undertaking both CA functions and managing infrastructure within the same organisation structure) is common in many countries (for example in Africa, fisheries administrations in 19 countries perform the CA functions. This is most popular model for CA organisation on the continent (66% of EU authorised countries) and in Audit reports published by DG SANTÉ has never been considered to be a potential source of conflicts of interest.

Whilst present in theory, this risk of conflict of interest is not considered to be material (given the limited and indirect role of SFA in exports, and its activities remaining only at the level of the fishery). The consultant considers that the issue should not be a barrier to selecting the SFA as the host to the CA, if this approach is considered to have other significant advantages.

⁷ These policy options would need to be considered at a high level by the Ministry of Finance, since as an autonomous authority, the SFA is expected to be self-financing. At present there is no specific formula for the calculation of the dividend paid by the SFA to Government.

13.3.3 Scenario 2c: Independent Authority under the MFBE

The Scenario of an independent authority under the MFBE has several of the advantages (in terms of independence) of the SFA Scenario 2b. It would also:

1. **avoid the need to consider the risk of the conflict of interest**, since the Authority would only have one function
2. **a new Act for the establishment of a new Authority** would be required
3. be a **significantly higher cost operation** since separate overheads would need to be supported (governance mechanism, such as Board, administration, HR and finance)
4. **income would be retained within the Authority**, but this would not be sufficient to cover all of the costs; the net cost of the operation (cost less the income generated) would have to be supported by a **substantial budgetary appropriation, which undermines the justification for authority status.**

13.4 Other options for sources of finance

In addition to financial structures outlined above, the following options were also considered by the consultant, as means of contributing to the financial sustainability of the FIQCU.

13.4.1 Opportunities for increased income/reduced costs:

1. **Sector development/investments will require additional services** (Zone 14 - six processing investment) and Ile du Port development with Taiwan Deep Sea Fisheries Agreement, November 2022 will provide opportunity for additional income in approval fees (export processing establishments and vessels).
2. **Savings through increased efficiency**; new software investment will allow better risk profiling for inspection and sampling, leading to reduced costs and/or safer products
3. **Potential for reduced medium term costs by outsourcing to third parties** (e.g. new testing labs coming on stream, vessel inspections by CA's or inspection bodies in country of discharge (under MoUs)

13.4.2 Increased fees for services

FIQCU Fee rates are determined by Government Regulation and recently raised, with no immediate scope for change. However, in the longer-term there may be potential for adjusting fees to increase recovery rate.

13.4.3 Support for investments under the SFPA Sectoral Support

In the past, the Sustainable Fisheries Partnership Agreement (SFPA) Sectoral support programme has provided regular modest financial grants to assist the FIQCU with operational expenditure. In September 2023, recognising that FIQCU budgetary appropriation for 2024 were inadequate to meet urgent needs, the Government of Seychelles and the EU agreed to allocate finance under the SFPA. This provides additional short-term finance during 2024 of SCR 1.2 million for recruitment of a replacement Head of FIQCU (one year contract SCR 600,000), software (SCR 500,000) and equipment (SCR 100,000). The finance is available immediately for disbursement.

The budgetary support is only available for investment expenditure, and salary support cannot be extended, with the expectation that the person recruited will be financed through national measures thereafter.

However, as regards future capital investment requirements for FIQCU identified above, the SPPA remains as a viable source of finance, which the parties to the Agreement could readily support in future. This could address the needs such as vehicles, quayside office facilities and capacity building of staff. This support could be available under all Scenarios defined in this section.

14 Conclusions

Fish exports are of the utmost importance to the Seychellois economy, probably on parity with the importance of tourism, and considerably less vulnerable to external shocks (as demonstrated by the COVID19 pandemic). The Competent Authority provides an essential link between the Seychelles fishery sector operators and export markets worth nearly €250 million annually, at a net historical cost to Government of about 0.05% of export value. All export markets require adherence to food safety conditions; the main one, the EU has strict sanitary access conditions for consignments of fishery products. Consignments are subject to risk-based controls and FIQCU is subject to periodic audit required to maintain Seychelles on the list of countries which may export fishery products to the EU.

The CA service presently struggles to adequately address all of its mandated tasks in an effective and efficient manner. The service is critically under-resourced particularly in terms of investment and technical management (with only one qualified staff member whose retirement is imminent). FIQCU needs have not been prioritised in the Government of Seychelles policy framework to a level commensurate with the economic importance on continued unfettered access to global markets for its fishery products. FIQCU under-performs on many measures. Whilst it has avoided any serious system failures, largely due to the professionalism and dedication of its staff, the margin of safety has been eroded by under investment in more secure system design, whilst the tasks have expanded in both dimension and complexity.

Concluding discussions held by the consultant at a high level with the MFBE, the MIEI and the Ministry of Finance (Public Service Commission) show that the Government of Seychelles clearly recognises the vital strategic importance of FIQCU to the national economy. All Ministries are concerned that in recent years budgetary limitations have impacted negatively on the quality of service and increasing the risk of export of non-compliant fishery products. All Ministries consider that steps should be taken to ensure that immediate short-term needs are addressed to maintain the Unit's operational effectiveness, and that in the medium term its management and budgetary arrangements should be optimised to addressing the structural deficiencies identified in this functional review.

In the opinion of the consultant there is a finite risk of a significant system failure due to the insufficient coverage of relevant food safety controls. This could result in the export of non-compliant consignments, increasing the cost of export (for example through safeguard testing at importer costs) and risking loss of access to the EU market, thus threatening the national economy. A new, more sustainable resource commitment and organisation structure is indicated to ensure continuity of the Seychelles fishery product export sector.

Many of the constraints experienced by the FIQCU arise because of the static nature of the staffing and financial dimensions of the service in the face of highly developed and dynamic fishery sector, which is well integrated and tuned into meeting the changing needs of global markets. In general, a more flexible means should be sought of ensuring that the FIQCU remains fit for purpose, and which reflects the changes within the Seychelles fishery sector (as well as meeting the needs of evolving regulatory requirements for SPS measures in international trade, and scientific understanding of hazards). FIQCU should therefore be able to act as independently as possible from the restrictions applied to regular government services.

The Competent Authority function would be unlikely to be fully financially sustainable on its own account in the foreseeable future. Most exports consider CA costs as basic costs to be sustained to

allow their fishery and aquaculture operators to participate in the global markets, and this to be a public good. Whilst most CAs generate an income, experience suggests this is rarely sufficient to fully finance the service. A recovery of 30-50% is typical.

All the future scenarios consider a substantial increase in the resources available to the CA and its functions, with associated changes to budgets. This would fund additional capital investment (vehicles, port offices, software and equipment) and elevated operating costs (salaries to attract qualified staff, strengthened technical management capacity). This is essential to guarantee that the Seychelles can maintain its strategic position as the main regional export hub for the Indian Ocean tuna industry, as well as develop a more diversified aquatic products sector (including aquaculture).

Whilst in 2023/2024 the SFPA Sectoral Support will finance the recruitment and (more attractive) salary of a replacement for the retiring Head of FIQCU, this will not be sustainable in future (2025 onwards). Location of the FIQCU in future within a structure which limits the ability to pay salaries which are attractive enough to recruit and retain well-qualified and experienced staff at all levels will maintain the structural disadvantages of the status quo scenario. For this reason, the Scenarios 1 (continued location of the FIQCU within the SBS) or Scenario 2a (as a Department within the MFBE) are not considered to be provide sufficient guarantee of sustainable finance in the future.

If the FIQCU were to be transferred to an independent Authority under the jurisdiction of the Ministry of Fisheries and Blue Economy, this would ensure that it would receive the more focused attention of policy makers, and thus remain coherent with operator activities in the sector. It would also have the potential of meeting needs by drawing directly on financial sources other than the state budget (i.e. sectoral support under the EU-Seychelles SFPA and the income generated by FIQCU). Transferring the Unit to an independent authority (whether within the SFA or as a stand-alone Authority) would provide the flexibility necessary to overcome the limitation on salaries and reduce dependence on budgetary expenditure (since income generated could be retained). The Treasury would lose the income currently received from FIQCU activities (SCR 2.4 million) and would need to agree that the CA function performs an essential public good deserving of state support and undertakes to ensure that the current subvention (SCR 4 million per year) remains available to finance the FIQCU. These means could be either by a direct budgetary allocation via MFBE, or (in the case of SFA) or by recognising the CA function in the calculation of dividends paid to Government by the Authority.

Of the two options for such an Authority, Scenario 2c (fully financial independent authority dealing exclusively with the CA functions) would provide still greater flexibility but would require a substantial additional budget to cover higher administrative overheads, which would demand a significant increase in either the budgetary appropriation or the charges paid by fishery operators. Both sources have potentially negative political, economic and financial impacts and are not considered feasible, at least in the short or medium-term.

Although it will require careful management of financial aspects, and a potential conflict of interest, the study suggests that the most sustainable means of ensuring a progressive and high-quality Competent Authority function would be the transfer of the FIQCU to the Seychelles Fishing Authority, as described in Scenario 2b.

15 Recommendations

In the short term (2024), the Government of Seychelles is recommended to:

1. Ensure that the capacity of the FIQCU is increased to improve the effectiveness and efficiency of controls. This should include the following steps, currently underway, and for which finance has been allocated:
 - a. Completing HQ building repairs

- b. Recruitment of new head to provide continuity of management
 - c. Specification and procurement of software, and equipment for inspectors
2. Consider, at the highest level (in MIEI, MFBE and Ministry of Finance), the different scenarios for the short and medium term financial and institutional arrangements for the FIQCU and determine which pathway it wishes to undertake.
 3. Put in place the necessary legal, financial, and institutional framework for implementation of the decision at 2 above.
 4. If in future the mandate were to be transferred to the jurisdiction of the Ministry of Fisheries and Blue Economy, then the Export of Fishery Products Act should be amended to re-nominate the Competent Authority.
 5. If the SFA were to accept a nomination as the Competent Authority (requiring a Board Decision) then the SFA Establishment Act) would need to be amended to extend functions to include “those mentioned in any other written law.”, a phrase omitted in the current draft legislation being considered by the Ministry.
 6. The Sectoral Support under the SFPA is a highly relevant vehicle for financing essential future capital investments in equipment, infrastructure, capacity building. Key investments required are in relation to offices at fishing ports, vehicles and training of staff. This support should be programmed and ongoing, irrespective of the institutional location of the FIQCU.
 7. Once the institutional framework for the future FIQCU is decided in principle, the options for financing the increase in operating costs required to maintain the service, should be considered. In all cases, the FIQCU should be served with an adequate operating budget to strengthen technical management capacity with an appropriately qualified head and two deputies.
 8. Continue the development of the laboratory testing capacity under the SBS, with improved efficiency and quality of service in relation to food safety parameters relevant to the national fishery sector.

In the medium term (2025 onward), the Government of Seychelles is recommended to:

1. Re-locate the FIQCU within the Seychelles Fishing Authority, with agreed mechanisms in place for secure financing for the future. Income generated by the FIQCU would be retained within SFA and applied to the CA function, and the balance of the required budget may be provided directly through a budgetary appropriation equivalent to current levels (SCR 4 million/year), or adjustment of the SFA dividend paid to Government. The required laboratory testing services would be outsourced to SBS and other laboratories as required.
2. Address potential conflicts of interest with current SFA activities (management of fisheries infrastructure and technical advisory services) through the adoption of clear and transparent mandates and procedures, supported by audits (internal and/or external).
3. Ensure that in future the capacity of the CA remains commensurate with the dimensions of the dimensions of the fish export sector. The net cost to Government is recommended to approximate to 0.08% of the level of exports.
4. Consider whether the future role and capacity of the Competent Authority should extend to the domestic market. This can be achieved through the authorisation of named officers under Section 4 of the Food Act by the Public Health Commissioner, with the details of the

cooperation set out in a MoU between the parties. This step will guarantee steady improvement in the conditions in small scale fisheries and domestic distribution systems delivering safety benefits to consumers in domestic, tourist and export markets.

5. Re-brand the FIQCU service, to reflect its significant status in performing front-line functions supporting a major component of the national economy. This is recommended to consider:
 - New name to better communicate the nature of its functions (e.g. Seychelles Marine Products Control Service)
 - New titles for the senior management positions (e.g. Executive Director, Science Officer etc)
 - Dedicated Promotion and outreach activities (brand and logo, website, social media) aimed at improving awareness of the importance of the food safety of fishery products to public health and the national economy.

Annex 1: Terms of Reference

The production and consumption of food is central to any society and has a wide range of economic, social and in many cases environmental consequences. Food quality and safety is a major concern for the food industry, especially with growing consumer awareness and concern on food safety issues. Food safety has become a prerequisite for the protection of consumer health, and it also serves the commercial interest of producers and processors. Within the fishing industry, the increasing demand for fish and the development in international fish trade have not only raised concerns about the sustainability of marine fisheries, but also the quality and safety of the products internationally traded. The globalisation of the world economy and the development of regional economic groupings have emphasized the need to harmonize fish safety and quality assurance approaches, with the view to ensure fish safety and fair-trade practices. In Seychelles, fish and fish products are at the forefront of food safety and quality improvement issues as they account for 92%⁸ (SCR 4,996 million) of total merchandise exports in 2021, with Europe being the primary market. Currently Seychelles mainly exports canned tuna, frozen tuna, fresh fish on ice, and fishmeal and oil.

The Fish Inspection and Quality Control Unit (FIQCU) was designated under the Seychelles Bureau of Standards (SBS) through the Export of Fishery Products Act, 1996, as the Competent Authority (CA) of Seychelles. The FICQU was mandated to perform official controls on fish and fish product sanitary conditions that are required for export purposes, including the issuance of health certificates for every consignment of fish and fish products exported from the Seychelles to any destination country. In 1999, the unit was given the status of Competent Authority by the EU to certify all export of fish and fishery products to the EU.

The development of Seychelles' fisheries sector is tightly linked to diversification, economic resilience and sustainability. As a result of the limited scope for growth in catch or production, the Government has emphasised the continued expansion of fisheries through enhanced value addition, encouragement of a circular economy, and the development of aquaculture. The potential for value growth is linked to increased services, increased capture of the tuna being transshipped in Port Victoria, improved quality and marketing of demersal fish and tuna from small-scale fishing vessels, and production of high-value, niche products from the aquaculture sector. The FIQCU in its capacity as Competent Authority has a critical role in supporting the fishing industry since it is the only organization authorized to certify export of fish and fish products from the Seychelles.

As a result of the prospects for growth in the fisheries sector and the potential impacts on the CA to effectively and efficiently deliver services to the sector, the Ministry of Fisheries and the Blue Economy (MFBE)⁹ is now recruiting a consultant to undertake a functional review of the Fish Inspection and Quality Control Unit and propose the ideal institutional framework, capacity needs and development, and policy support needed for fisheries sector food safety control.

⁸ NBS (2021)

⁹ In terms of fisheries administration, the Ministry of Fisheries and the Blue Economy (MFBE) is responsible for all fisheries related matters. Its mandate is to provide a conducive and legal framework for the fisheries sector. The Seychelles Fishing Authority (SFA) is the executive arm of the MFBE and its role is to carry out management, planning, development, scientific and training functions, conduct scientific and development research as well as perform regulatory functions.

➤ OBJECTIVES OF THE ASSIGNMENT

The objective of the assignment is to conduct a review of the FIQCU as the competent authority involved in the certification of export of fish and fish products from the Seychelles. The assignment will assess the functional efficiency and effectiveness of the FIQCU in fulfilling its mandate, as well as its ability to deliver those functions in line with development policy and objectives for the fisheries sector. Based on this review, the consultant will make recommendations and prepare a capacity building plan to improve functionality and strengthen the capacity of the FIQCU.

1. TASKS

The main tasks of the consultancy will include, but are not limited to:

- Review the mandates of FIQCU and its compliance to fisheries laws, regulations, policies, strategies and development plans;
- Assess and review the mandate for units within FIQCU, mapping their responsibilities and relationships between the Department of Fisheries and the Seychelles Fishing Authority (SFA);
- Assess the efficiency and effectiveness of the performance of the FIQCU in managing resources and delivering services for the fisheries sector; to account for future sectorial development and demand for services.
- Identify any organizational deficiencies influencing the performance of the FIQCU in relation to current organization and strengths of the institution;
- Recommend options for an improved organisational structure of FIQCU, including:
 - Institutional framework and staffing requirements
 - Qualification and competencies profile (existing compared to required)
 - Training needs and identification of scope and opportunities for training.
- Analyse, consolidate and produce functional assessment report with a capacity building plan for short, medium and long-term implementation.

2. OUTPUTS REQUIRED OF THE CONSULTANT

The consultant is required to furnish the following deliverables:

1. An inception report outlining approach, methodology, work plan and proposed outline of report;
2. Produce a draft report, including findings, recommendations and proposed capacity building plan;
3. Submit a final report and associated documents;
4. A completion report.

5. SCHEDULE FOR COMPLETION OF TASKS

The contract shall be for a maximum period of 5 months, delivered in two phases (Phase 1-May/June and Phase 2-September/October 2023)

Activity/ Deliverable	Deadlines
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Signing of contract	May 2023
Inception report	End of May 2023
Draft report	End of June 2023
Final report	Mid-October 2023

6. COMPOSITION OF REVIEW COMMITTEE TO MONITOR CONSULTANTS WORK

The consultant will report to the Ministry of Fisheries and the Blue Economy but will work in collaboration with relevant partners, as required. A Steering Committee will be established comprising of representatives from the Ministry of Fisheries and Blue Economy to guide and support the consultant. The Steering Committee will also invite key stakeholders on an ad hoc basis to be part of the Committee. The consultant will provide monthly progress summaries to the Steering Committee and will respond to queries and draft documents in a timely manner.

7. PROCEDURE FOR REVIEW OF SUBMISSIONS

The Committee will have sight of all the expected deliverable for peer review. The Committee will work closely with consultant to ensure that all the objectives are covered through the review.

8. DATA, SERVICES AND FACILITIES TO BE PROVIDED BY THE CLIENT

The qualified consultant will obtain the support and corporation of the Ministry of Fisheries and Blue Economy. The Ministry will make provision for the following logistical and practical arrangements:

- Office space and access to meeting rooms for the duration of the consultancy;
- Printing facility; and
- WIFI and/or internet connection.

Moreover, the Ministry would provide assistance to the consultant in regards to data collection and information accessibility upon request.

Annex 2: List of persons consulted

The following key informants/data sources were consulted during the mission:

Name	Position	Organisation	Contact
Jean-François Ferrari	Minister	Ministry of Fisheries and the Blue Economy	info@mofbe.gov.sc
Roy Clarisse	Principle Secretary	Ministry of Fisheries and the Blue Economy	
Devika Vidot	Minister	Ministry of Investment, Entrepreneurship and Industry	mnalletamby@gov.sc
Michael Nalletamby	Principal Secretary	Ministry of Investment, Entrepreneurship and Industry	mnalletamby@gov.sc
Alex Henderson	Head, International Cooperation Department	Ministry of Investment, Entrepreneurship and Industry	
Sheriffa Morel	Director General	Department of Fisheries, Ministry of Fisheries and the Blue Economy	sheriffamorel@gov.sc
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Stephanie Radegonde	Senior Policy Analyst	Department of Fisheries, Ministry of Fisheries and Blue Economy	sradegonde@gov.sc
Margaret Ally	Head, PDQA Department	Seychelles Fishing Authority	mally@sfa.sc

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Sreekala Nair	Deputy CEO & Head of and Biochemical Testing Services	Seychelles Bureau of Standards	mltc-sbs@email.sc
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