



INSPECTION AND EVALUATION REPORT

(SUSTAINABLE FISHERY PROJECTS WITH ICS)

OPERATOR: Vicfish Ltd

PROJECT NAME: Vicfish Ecolabelling Project

PROJECT NUMBER: VFL-020-2009

INSPECTION REPORT No: VFL-001-2009

INSPECTION DATES: 22nd – 31st January 2009

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1 Project

<i>Project Name (Fisheries Group)</i> Vicfish Ecolabeling Project	<i>Mandator/Commissioner</i> Vicfish Ltd
<i>Operator's Mailing Address</i> P.O. Box. 1139, Bukoba. Tanzania.	<i>Operator's Physical Address (Village/Town, Country)</i> Bukoba, Tanzania
<i>Telephone:</i> 225 22 20541 <i>Fax:</i> 225 22 20566 <i>Email:</i> info@naturesbountytz.com	<i>ICS Project Manager:</i> J. Maiseli

2 Inspection Details

<i>Inspector</i> Charles Walaga (Lead Inspector) Kemilembe Barongo (Inspector)		<i>Inspection Date(s)</i> 22nd - 31st Jan 2009			
x	The ICS Manager was present during inspection	x	Announced visit	x	Complete first audit
x	Exit discussion was concluded		Unannounced visit		Complete update audit
	Risk assessment was done		Visit with focus re-inspections		Spot check
Standards for which certification is requested: Naturland Standards for Sustainable Capture Fishery					
Fishery for which certification is requested: Lake Victoria Nile Perch fishery in a semicircular area stretching from Igabilo at 1°9' 55.5" South and 31°52' 32.3" East near the Ugandan Border to Nyaburo at 1°32'41.9" South and 31°54'10.1" East in Bukoba Urban, Bukoba Rural and Muleba Districts of Kagera region in Tanzania.					

2.1 Details of Inspection

Inspection Schedule

Date	Inspection Activity
22 nd Jan 2009	Travel to project area, Bukoba, Tanzania (Charles Walaga from Kampala and Kemilembe Barongo from Dar es Saalam)
23 rd Jan 2009	<ul style="list-style-type: none"> Brief by inspectors on purpose of the inspection and its scope Brief by project staff on current status of the project since the November inspection protocol development Evaluation of Internal Control System: Assessment and audit of internal control records (documents and reports) and interview of ICS coordinator, documentation officer and landing site supervisor.
24 th Jan 2009	Inspection at Nyamukazi landing site: Inspection of fishing boats, fishing gear and fish handling facilities, interview fishermen, collector, supplier and landing site monitor, records audit, inspection of landing site hygiene facilities
25 th Jan 2009	Inspection at Nyabesiga and Rushala landing sites: Inspection of fishing boats, fishing gear and fish handling facilities, interview fishermen, collectors, suppliers and landing site monitor, and records audit, inspection of landing site hygiene facilities
26 th Jan 2009	Kelebe and Igabiro landing sites: Inspection of fishing boats, fishing gear and fish handling facilities, interview fishermen, collectors, suppliers and landing site monitor, and

	records audit, inspection of landing site hygiene facilities
27 th Jan 2009	Kelebe and Nyamukazi landing sites: Inspection of fishing boats, fishing gear and fish handling facilities, interview fishermen, collectors, suppliers and landing site monitor, and records audit, inspection of landing site hygiene facilities
28 th Jan 2009	<ul style="list-style-type: none"> • Inspection of fish processing, storage, packaging and storage and waste water management, first aid facilities • Records audit • Interview and records check at Dejaplus Technologies Ltd • Interview TUICO Regional Secretariat • Interview Labor Officer • Interview District Fisheries Officer
29 th Jan 2009	<ul style="list-style-type: none"> • Interview factory employees and check on employment policies and practices • Interview In-Charge of the Government's Surface and Maritime Transport Regulator Authority (SMTRA) • Interview In-Charge of the Government's Fisheries Surveillance Unit
30 th Jan 2009	<ul style="list-style-type: none"> • Inspectors' assessment of interim findings • Exist meeting with senior Vicfish Ltd and project managers
31 st Jan 2009	Travel from project area, Bukoba, Tanzania (Charles Walaga back to Kampala and Kemilembe Barongo back to Dar es Saalam)

In the course of the inspection information was obtained from the following sources

Check box	Information Source	Details
x	Interview ICS Manager	S.N. Tiwari (Coordinator of the ICS)
x	Re-inspection of Fisheries activities (List them)	→ see 2.2
x	Interview(s) with other ICS staff	J. Maiseli, Project coordinator, Murgesh, Quality Assurance Manager, G. Daudi, Documentation Officer, Y. Kabyemela, Landing Site Supervisor and landing Site Monitors at the visited landing sites
x	Check of ICS records	Conflict of interest declaration forms for ICS staff, Subcontracts with Suppliers, Collector's subcontracts with suppliers, Fishermen registration documents, Internal audit reports (for suppliers, for collectors, for fishermen/boats,
x	Visit to other fisheries activities and storage areas	All landing sites have other fishermen, collectors and suppliers who work with other fish processors other than Vicfish. The Facilities that they use were seed during the visit to Vicfish Ecolabeling Project facilities and fishing areas
	Visit to fishing grounds in neighborhood	
x	Visit to authorities, NGOs, etc.	<ul style="list-style-type: none"> • Government's Fisheries Department, Government's Surface and Maritime Transport Regulator Authority (SMTRA), Government's Fisheries Surveillance Unit, Government's labor office • Beach Management Units which are recognized stakeholder committees at each landing site • TUICO (Workers Union)
x	Interview responsible person(s) for the purchases	• Production Manager Nagaraj and the Quality Assurance Manager, Murgesh
	Laboratory analysis (e.g. of water, vegetation and fish, etc)	The operator has a laboratory for these analyses but these inspectors did not conduct any laboratory analyses nor take samples for analysis.
x	Others interviewed:	Suppliers, collectors, factory workers and fishermen

Language of inspection (if translation was used, give details):

English with project staff and Swahili with fishermen. Translation (from Swahili to English) was sometimes done for the fishermen.

2.2 Overview of Inspection

<i>Project Site</i>	<i>No. re-inspected fishermen</i>	<i>Comments</i>
Nyamukazi landing site	10	Fisherman was knowledgeable about the sustainable fishery requirements but could not recall the amount of fish he had harvested in the previous 30 days
Nyabesiga landing site	4	Fishermen have fair knowledge of the sustainable fishery requirements
Rushala landing site	3	Fishermen were knowledgeable about the sustainable fishery requirements and all keep their own record of fish harvested on a daily basis
Kelebe landing site	9	All fishermen have a good understanding of the sustainable fishery requirement and keep their own record of fish harvested on a daily basis
Igabiro	8	

<i>Inspected Landing sites and facilities</i>	<i>Comments</i>
Nyamukazi landing site	Landing site near the factory on main land. Well maintained clean landing site with adequate fish cooling facilities, an office and children's play ground.
Nyabesiga landing sites	Had good toilet facilities but fishermen's sleeping facilities are of uncertain quality. However, this landing site is very near the main land and some of the fishermen sleep on their homes located on the mainland. There is need to set up minimum standards for fishermen's accommodation conditions.
Rushala landing sites	Landing site on main land. It is well maintained clean landing site with adequate fish cooling facilities, an office and children's play ground
Kelebe landing site	This is the furthest landing site. Toilet facilities have been established but access is at a fee. Office and fish landing facilities in place. At this landing site, each supplier transports own ice from Vicfish fish cooling.
Igabiro	Landing site with adequate fish landing facilities. However, the supplier is operating from his newly established landing site nearby. This new site is very poor with highly unhygienic conditions and should be abandoned until sufficient facilities have been set up to handle fish sustainable fish. The supplier should revert to existing established facilities at Igabiro.

<i>Inspected processing units as part of ICS project</i>	<i>Type of processor</i>	<i>Processed products</i>
	Contracted processor	Nile perch fish fillet.
	x Own processing	
	Contracted processor	
	Own processing	

Comments: None

3 Project Description

3.1 Brief History and Background of Project (Only if the information in the ICS is not adequate)

The Eco-labelling Project (ELP) is a project of Vicfish Ltd with a Public–Private Partnership (PPP) concept and a commitment to ensure sustainable artisanal fisheries of Lake Victoria perch in a pilot area that lies within a ‘semicircle’ encompassing fishing areas and landing sites within Bukoba Urban, Bukoba Rural and Muleba districts of Kagera Region in Tanzania. Details of the project are well described in ‘Annex 1-Vicfish ICS Manual (Jan 2009)’.

3.2 Activities of the Project

Overview of Project Sites

Geographical coordinates and map showing the location of the project sites are given in sub-section 2.3 of the ‘Annex 1-Vicfish ICS Manual (Jan 2009)’

Description of all production & handling steps (until sales): (only if not adequately described in the ICS)

The production and handling steps are described in sub-section 2.4 and section 6.0 of the ‘Annex 1-Vicfish ICS Manual (Jan 2009)’

	Compliance Criteria	Cat.	OK	PF	NF
3.2.1	An overview of the sustainable fishery activities and facilities is available, (fishing grounds, fishing methods and tools, fish handling)	B	x		
3.2.2	There is a description of all steps that take place from fishing to final sales of processed fish products, including which entity and who is responsible for the product at each stage.	B	x		

OK= Fulfilled (ok), PF= partly fulfilled → comments needed, NF= not fulfilled → comments & measures needed, N/A = not applicable

Remarks:

- The ICS manual gives a good overview of the sustainable fishery activities and facilities for the Eco-labeling project.
- All steps from fishing through processing to final sale are described in the ICS manual

3.3 Basic Information about primary fishery production area

SHORT introduction to geographical location, climatic characteristics of the region, the economic activities in the catchment area of the fishery, the ecology of the fishery and fisheries activities. (Much of it will already be in the ICS document)

The project is located in the Kagera Region of Tanzania on the western part of Lake Victoria that lies in the Tanzanian Territory. Lake Victoria is a fresh water lake owned by the three east African states of Uganda, Kenya and Tanzania. Each country controls the main fisheries activities through their respective Fisheries Departments. Efforts at joint management of the resources of the Lake are currently being coordinated by the Lake Victoria Organization that was set up by the three countries.

Fish is one of the main economic activities in areas of Kagera region that are in the neighborhood of Lake Victoria. The rest of the region is dominated by small scale farmers growing a variety of cash and food crops like coffee, tea, bananas, beans, sweet potatoes. There is also substantial livestock (Cattle) farming under the traditional free grazing management systems.

3.4 Typical Fishing System of the Registered Fishermen

If necessary according to project site

The fishing system in the project area is simple. The fishermen operate on fishing boats and use fishing equipment owned by local fish entrepreneurs who are referred to as ‘Collectors’ or ‘Suppliers’. The fishermen go to the cast the nets between 3.00 – 5.00 p.m. and due to the high cost of fuel, the fishermen whose boats are powered by moat

boat engines, spend the night on the lake. The fishnets are retrieved in the morning and the fish is landed between 7.00 a.m. – 11.00 a.m. Fishermen who use

3.5 Fishermen in the Project

The fishermen in the fishing group are (Tick in the boxes which ever is correct):

	In fishing grounds are scattered over the project's area	x	Fishing grounds are closely located to each other/all in same area
	Scattered individual fishermen		Clusters of neighboring fishing grounds
	A couple of fishermen are registered per fishing area	x	Basically all fishermen in the certified fishery are registered

Total number of Suppliers:	Certified	0
	In conversion	16
	Passive/suspended, etc.	0
Total number of Collectors:	Certified	0
	In conversion	49
	Passive/suspended, etc.	0
Total number of fishermen:	Certified	0
	In conversion	698
	Passive/suspended, etc.	0

Comment:

Suppliers, Suppliers and Fishermen are terms used in the project to describe the different types of actors in the lower fish chain that the operator works with. The Suppliers and Collectors own the fishing boats and gear that the fishermen use for fishing. Fishermen are therefore employees of the Suppliers and Collectors. Suppliers own the largest number of boats while the Collectors own a few boats. Collectors therefore operate on a small scale and can not supply Vicfish Ltd directly but sell their fish to the Suppliers who bulk it with fish from their own boats for delivery to Vicfish. Ltd.

4 Risk Assessment

4.1 Risk Assessment by the ICS

Summary of most important risks identified by the ICS

RISK	PREVENTIVE MEASURES	INDICATORS
Lake level and collection		
Indiscriminate procurement of fish (sustainable and non sustainable)	<ul style="list-style-type: none"> Fish suppliers to be sensitized on sustainable fisheries. Control by LSM Internal Inspection 	<ul style="list-style-type: none"> Reports and attendance lists of the sensitization meetings and trainings Daily Catch analyses sheets Internal inspection forms/spot check lists
Fisherman buys other fish on the lake and sells it as his own fish and fish from illegal gear	<ul style="list-style-type: none"> Sensitization of fishermen to explain the need for a traceability system in eco-labeling fishery LSM monitoring the amount of fish landed 	<ul style="list-style-type: none"> Report and attendance lists of sensitization meetings and trainings amongst the fishermen. Daily Catch analyses sheets Internal inspection forms for the lake
Fisherman uses illegal fishing gear.	Serious sensitization of fishermen on requirements of Fisheries Act.	<ul style="list-style-type: none"> Report and attendance lists of sensitization meetings and trainings amongst the fishermen. Fishermen Register (both paper and digital copy) Internal inspection forms
Collection/procurement of non sustainable fish and selling it as fish from sustainable fisheries.	<ul style="list-style-type: none"> Sensitization of collector Proper record keeping by Collector and suppliers 	<ul style="list-style-type: none"> Daily Catch analyses sheets Internal inspection forms

Collector level		
Sustainable and non sustainable fish is stored in the same truck/boat.	<ul style="list-style-type: none"> Careful information to the Supplier and his staff on the requirements for handling of fish from sustainable fisheries. Accurate record keeping of the catch data 	<ul style="list-style-type: none"> Transport records(Movement permit from BMU) Daily Catch analysis sheet
Supplier level		
The supplier buys conventional fish and tries to sell it as fish from sustainable fisheries.	<ul style="list-style-type: none"> Careful information to the Supplier and their staff on the requirements for fish from sustainable fisheries. Accurate record keeping of the catch data. 	<ul style="list-style-type: none"> Transport records(Movement permit from BMU) Daily Catch analysis sheet
Use of raw materials from non sustainable fisheries.	<ul style="list-style-type: none"> Set up separate sustainable batch and put up small sign posts to make sure that everybody is aware. Check raw material at fish receiving before processing. 	<ul style="list-style-type: none"> Daily delivery notes for raw materials. Staff Interviews about procedures.
Factory (or processor) level		
Temperature abuse	Maintenance of cold chain, avoid delays along processing line.	Temperature check list
Contamination with cleaning chemicals	Proper Cleaning and rinsing pre-shift commencement	Daily cleaning and Hygiene checklist
Mixing of eco-labeled with Non-eco-labeled fish	Separation by time during processing Constant supervision during processing	Processing schedule
Labeling		
Wrong packing	Proper regular training of packers	Label on the product and training report
Wrong/illegible labels on packages	Proper regular training of labeling staff	Label on the product and training report
Export		
Temperature abuse	Maintain cold chain throughout transportation.	Temperature checklist

	Compliance Criteria	Cat.	OK	PF	NF	N/A
4.1.1	A detailed initial risk assessment has to be done by the ICS at the beginning of certification (risks at fishing level, buying & handling, transportation, storage and processing).	B	x			
4.1.2	The ICS takes all measures to minimize the identified relevant risks.	B	x			

OK= Fulfilled (ok), PF= partly fulfilled → comments needed, NF= not fulfilled → comments & measures needed, N/A = not applicable

4.2 Risk Assessment by Certification Body for Determination of Re-inspection Rate

(if project sites are very different → separate risk assessments for different project sites)

Potential risk area	Identified major risks (yes/no)		Evaluation of risk and prevention of the risk by project
	Y	N	
Permitted fishing gear		x	Fishing with illegal methods and gear is common in the area Not common though it exists and the authorities are seriously fighting it with the cooperation of other stakeholders especially the Beach Management Units and the Fish Processors.
Fishermen		x	Contracted fishermen not well aware of sustainable fisheries standards, methods and tools
		x	Contracted fishermen not really convinced of sustainable fisheries

Potential risk area	Identified major risks (yes/no)		Evaluation of risk and prevention of the risk by project	
	Y	N		
		x	Contracted fishermen also involved in non-sustainable fishing activities	
	x		Contracted fishermen also fish in same fishing areas as non contracted fishermen	The same fishing areas and landing sites are used by both contracted fishermen in the Sustainable Fish Ecolabeling project and non contracted fishermen who are not in the project
ICS & project organization		x	ICS staff not sufficiently qualified for efficient control	
		x	ICS does not have sufficient staff or lacks means for effective control (e.g. efficient transport)	
		x	ICS staff has changed	
		x	First evaluation of the ICS → results automatically in medium risk category at a minimum	This is the first inspection of the project and the first evaluation of the ICS
		x	ICS has failed to detect major non-compliances → results automatically in highest risk category	
		x	High incentives for fishermen to sell fish from other sources as fish from sustainable fisheries	Appears that the fishermen are bound to the boat owners (their employers) who are in turn bound to the suppliers who fund their activities. This makes it almost impossible for fishermen to buy in fish from other sources.
Collectors	x		High incentives for suppliers to sell fish from other sources as fish from sustainable fisheries	Collectors could bring in fish from other sources (none certified fishing boats, fishermen and landing sites) in order to increase their income if the project starts to offer a premium price for sustainable fish
Suppliers	x		High incentives for collectors to sell fish from other sources as fish from sustainable fisheries	Suppliers could bring in fish from other sources (none certified fishing boats, fishermen and landing sites) in order to increase their income if the project starts to offer a premium price for sustainable fish
Sum of identified risk points: 4				

Overall Risk Evaluation and Risk Categorization:

	Low risk (1-3 risk)
x	Medium high risk (4 - 5 risks)
	High risk (> 5 risks OR major non-conformities not detected)

4.3 Determination of Inspection Procedures

Qualification for Group Certification under the sustainable fisheries standards

	Compliance criteria	Cat.	OK	PF	NF	N/A
4.3.1 4.3.2	The requirements for group certification of artisanal fishermen are fulfilled (homogeneity of members, similar fishing gear and methods, same marketing arrangements for sustainable fishery)	A	x			
4.3.3	If big fishermen are certified as part of a small fishermen certification project, it has been ensured that: <ul style="list-style-type: none"> • Every fisherman inspected frequently under the ICS. • Each fisherman has to keep the most relevant documentation for the fishing activities. • Common marketing is under the responsibility of ICS operator (no fisherman markets sustainable fish elsewhere). 	B				x

OK= Fulfilled (ok), PF= partly fulfilled → comments needed, NF= not fulfilled → comments & measures needed, N/A = not applicable

Remarks: None

4.3.3: All fishing boats are of more or less of equal size with equal capacity.

Determination of re-inspection rates for the fishermen based on risk assessment

Square root N (or minimum number):	27
Risk factor (normal: 1, medium risk : 1.2 high risk: 1.4)	1.2
Resulting minimum re-inspection rate (no. of artisanal fishermen):	33
Effective number of re-inspected artisanal fishermen	34
Effective re-inspection rate in % (No. re-inspected/No. total *100)	4.87%
Other comments regarding re-inspection rate/ re-inspection schedule	Suppliers and Collectors were considered as separate entities from fishermen.

Remarks:

In addition, Suppliers (16) and collectors (49) were grouped together to give a total of 65. Consequently the minimum number of 10 (3 Suppliers and 7 collectors) were re-inspection.

5 The Internal Control System

5.1 Structure and Organization of ICS

Brief Description

Name ICS Coordinator	S.N Tiwari
Name ICS Approval Manager	J Maiseli (Also project manager)
Centers of internal control:	1
No. of internal inspectors	8 (Referred to as landing site monitors in this project)
No. of field advisors	8 Are they identical with inspectors? Yes

Evaluation

	Compliance Criteria	Cat.	OK	PF	NF	N/A
5.1.1	The ICS operator has an organizational chart or table of responsibilities.	B	x			
5.1.2	One person is assigned to coordinate the ICS and interact/coordinate with the certification body.	A	x			
5.1.3	The ICS has assigned at least one person to make approval & sanction decisions	B	x			
5.1.4	There is a sufficient number of internal inspectors to perform frequent internal inspections each year.	B	x			

OK= Fulfilled (ok), PF= partly fulfilled → comments needed, NF= not fulfilled → comments & measures needed, N/A = not applicable

Remarks:

5.1.1: There is an organizational chart and a table of responsibilities

5.1.3: Two persons, the ICS Coordinator and Project Manager, make approval and sanction decisions

5.2 ICS Manual

Brief Description of the ICS structure and main elements

The ICS of the project consists of firstly, the compliance requirements for the fishermen, collectors and suppliers at the fishing level and their monitoring by the landing site monitors, then secondly, the handling of sustainable fish at the landing site and its documentation, and thirdly, the processing, packaging, labeling and storage of sustainable fish at the factory.

	Compliance criteria	Cat.	OK	PF	NF	N/A
5.2.1	There is an ICS manual , i.e. a set of documented forms and procedures of the internal control measures.	B	x			
5.2.2	The ICS Manual covers , in principle, all relevant procedures (and their documentation): internal sustainable fishery standards (fishing and fish handling rules), fishermen registration, internal inspection, internal approval/sanctions, selling/buying, product handling.	B	x			
5.2.3	ICS staff has up-to-date forms at hand and is aware of the valid ICS procedures	C	x			
5.2.4	The ICS Manual is reviewed on a regular basis and updated when necessary	B	x			
5.2.5	The ICS procedures, policies (with related forms) are implemented essentially as outlined in the ICS Manual	B	x			

OK= Fulfilled (ok), PF= partly fulfilled → comments needed, NF= not fulfilled → comments & measures needed, N/A = not applicable

Remarks:

5.2.4: Though this was the first inspection of the project, it was found that the project had carried out several revisions of the ICS manual

5.3 Internal sustainable fishery Standard

Evaluation of Internal sustainable fishery Standard

	Compliance criteria	Cat.	OK	PF	NF	N/A
5.3.1	There is a documented internal sustainable fishery standard	B				
5.3.2	The internal sustainable fishery standard regulates the following aspects sufficiently (with regard to requirements of certification standard):	B				
	- Fishermen only involved in sustainable fishing (if required) or requirements for separation of sustainable fish from conventional fish		x			
	- Handling of by-catches of non-targeted species		x			
	- No forbidden gear on-board		x			
	- Permitted fishing gear		x			
	- Handling of damaged gear		x			
	- Storage of sustainable fish (clean and iced conditions)		x			
	- Documentation of fishing trips		x			
	- No use of paints containing tin on bottom of boats			x		
5.3.3	The internal sustainable fishery standard is written in a language and manner that is clearly understood by all ICS staff .	B	x			
5.3.4	The (summary of the) internal sustainable fishery standard is presented in a language/form that it can be understood by artisan fishermen .	B	x			
5.3.5	All ICS staff is trained, knowledgeable, and competent in the implementation of the internal sustainable fishery standard and the internal approval requirements.	B	x			
5.3.6	The internal approval staff is familiar with the overall standard requirements of the (external certification standard).	B	x			

OK= Fulfilled (ok), PF= partly fulfilled → comments needed, NF= not fulfilled → comments & measures needed, N/A = not applicable

Remarks:

5.3.2: Fishermen do not store fish in iced conditions because they are within the vicinity of landing sites where they deliver the fish to collectors and suppliers who have transport boats with ice storage facilities or storage bins with ice. The ICE is provided by the operator

5.3.2: Chemical composition of paint used for the boats was not checked

5.4 ICS Documentation

Brief Description of Documentation System

The documentation system consists of registration lists (forms) and contracts for Fish Suppliers, Collectors and Fishermen and a recording of landed fish and its movement to the factory and within the factory (processing, packaging, labeling and storage) to point of export (export records) and the records of the monitoring activities (fishing, fish catch and landed fish, landing site conditions) that are conducted by the landing site monitors and supervisors. All project documents are kept and are accessible at the Ecolabeling Project offices at the Vicfish Factory.

Evaluation

	Compliance criteria	Cat.	OK	PF	NF	N/A
5.4.1	For each fisherman to be certified there is a written commitment declaration between the ICS and the fisherman. The declaration must contain an obligation to meet the sustainable fishery standards.	A	x			
5.4.2	The agreement/contract (or enclosed documents) describes the applicable production standards and allows the inspector access to the fisheries grounds, boats, gear, transportation, storage and processing facilities. It must be clear that non-compliances will be sanctioned. For each fisherman there is such signed contract available before buying.	B	x			
5.4.3	For each fisherman to be certified, a basic data form is available.	A-B	x			
5.4.4	The basic data form describes contains information on the biodata of the fisherman, fishing grounds of the fisherman, fishing gear and methods, fishing boat.	B		x		
5.4.5	An overview map (of the fishing area) shows the location of main fishing areas with code numbers for each fisherman fishing from such an area. The map is dated.	A-B	x			
5.4.6	In cases where the contracted collectors and suppliers are also involved in non-sustainable fishery the fishing facilities (boats, fishing gear and handling containers are different and the records are also kept separate here parallel handling is permitted	C				x
5.4.7	All important advice given to the fishermen is documented.	C	x			
5.4.8	For each fisherman the following minimum update information on his fishing activities is available: - Fishing area where the fisherman fishes from - harvested quantities, - quantities and identification of by-catches	B	x			
5.4.9	The internal fisherman inspection form (checklist) sufficiently covers all relevant certification aspects: - clear separation of sustainable fish & conventional fish - Handling of by-catches of non-targeted species - No forbidden gear on-board - Permitted fishing gear - Handling of damaged gear - Storage of sustainable fish - Documentation of fishing trips - No use of paints containing tin on bottom of boats The form includes an evaluation of the compliance of the artisanal fishermen with the internal standard as well as necessary corrective measures/conditions or recommendations.	B	x			
5.4.10	All registered fishermen are listed in the fishermen list , which contains at least the following information: fishermen's name, fishermen's code, boat registration, fishing areas/landing site, type of fishing gear and method, last date of internal inspection, internal approval status (sustainable /conversion year)	A		x		
5.4.11	Sanctioned fishermen and Boat Owners and those that have left the project are recorded on a separate Sanctioned Fishermen and Boat Owners list . The reasons and duration of the sanction (or reasons for leaving the project) are recorded.	B			x	
5.4.12	All documents of the ICS are kept for at least 5 years and are available for inspection at any time.	B	x			
5.4.13	Information for each fisherman and boat owner is consistent in the various ICS documents.	B	x			

Remarks:

5.4.4: The Basic data form does not contain details of age of each fisherman. Other details like fishing gear and fishing grounds are indicated elsewhere in the ICS and contracts.

5.4.9: Handling of damaged gear and use of paints on boats are the responsibility of the collectors and suppliers who are the owners of the boats and the fishing gear. Fishing trips are documented in the 'Catch Analysis Data per Boat per Trip'.

5.4.10: The fishermen List of Suppliers-Collectors-Fishermen' does not contain fisherman date of joining the project, fishing boat code number, landing site, last date of internal inspection, decision of internal inspection and approval status.

5.4.11: There is no 'Sanctioned Fishermen and Boat Owners list'

5.5 Internal Inspections

Brief Description of Internal Inspections (frequency, who, average time per inspection)

Internal inspections of 5 fishing boats (and the fishermen who use it) per landing site are conducted twice a year by the landing site monitor, All landing sites are inspected twice a year and a monthly catch analysis for fish suppliers is conducted by the landing site supervisor. The inspection of the fishing boat and its fishermen takes about 30 minutes.

Evaluation:

	Compliance criteria	Cat	OK	PF	NF	N/A
5.5.1	100% of the registered fishermen are INTERNALLY inspected at least once a year under the ICS arrangements.	A			x	
5.5.2	Physical internal inspection visits have actually taken place and are documented	A	x			
5.5.3	The internal inspection includes a visit to the fishing areas of the fisherman as well as an interview with the fisherman .	A				
5.5.4	The internal inspection includes a check of fishing records, fishing boat and gear, storages as well as inspection of handling facilities and records at the fish landing sites	B	x			
5.5.5	The internal inspections are thorough. All non-compliances with the internal sustainable fisheries standard have been duly identified .	A	x			
5.5.6	If necessary, corrective measures have been communicated (during or shortly after the inspection) to the fishermen. ICS has followed up to ensure that the measures were implemented	B	x			
5.5.7	The results of the internal inspection are documented in the internal inspection report accurately and the report has been signed by the internal inspector .	A	x			
5.5.8	There is a system to estimate harvest quantities and a record of these estimates for each fisherman.	B-C	x			
5.5.9	Harvest estimates are trustworthy .	B-C		x		
5.5.10	Harvest estimates are made for each season.	B-C			x	
5.5.11	If any non-conformities are found at other times (not at internal inspection), this is also duly documented .	B	x			

OK= Fulfilled (ok), PF= partly fulfilled → comments needed, NF= not fulfilled → comments & measures needed, N/A = not applicable

Remarks:

5.5.1: The ICS specifies only 10 boats (which is about 20 -30 fishermen) a year to be inspected. This number is proportionately too small considering that the project has more than 600 fishermen. The risk is that this proportion may not even cover newly recruited fishermen in view of the fact that there is considerable movement of fishermen in and out of the project

5.5.9: and 5.5.10: The current fish harvest estimates per boat are unreliable. It is probably difficult to set harvest estimates per boat per season. What may be useful is for this project is to monitor and investigate any large divergences from the average daily deliveries of all boats at any landing site since boats delivering at the same landing site fish from the same fishing grounds and use then similar fishing gear and lay and retrieve their nets at almost the same time.

5.6 Internal Approval & Sanctions

Brief Description of Approval System

The ICS defines the steps for developing the Sustainable Fishery Ecolabeling Project (ref section 6.2 in the ICS Manual). But this does not include the internal approval procedures.

Sanction procedures are described in the same section under the sub-heading ‘Approval and Sanctions’. The sanctioning process is initiated by the Landing Site Monitor or landing Site Supervisor when they fill in the violation form and forward it to the Project Coordinator or Project manager who then make the final sanction decision.

Overview of non-compliances identified by ICS this year and applied sanctions

None

Evaluation

	Compliance criteria	Cat	OK	PF	NF	N/A
5.6.1	Policies and procedures in place to approve or reject (sanction) fishermen, collectors and suppliers	B			x	
5.6.2	The ICS sets the exact sustainable status of each fisherman	B			x	
5.6.3	The fishermen’s list reflects the internal approval status for each fisherman, i.e. OK, passive,	A			x	

	Compliance criteria	Cat	OK	PF	NF	N/A
	suspended					
5.6.4	In case of minor non-compliances , appropriate corrective measures are taken by the ICS	B	x			
5.6.5	In case of major non-compliances , appropriate corrective measures & sanctions implemented by ICS	A		x		
5.6.6	If any fish that had already been bought as sustainable fish had to be de-certified , the ICS has followed up the product and taken appropriate corrective measures.	A				x

OK= Fulfilled (ok), PF= partly fulfilled → comments needed, NF= not fulfilled → comments & measures needed, N/A = not applicable

Remarks:

5.6.1, 5.6.2 & 5.6.3: There is no explicit policy and procedures for approving a fisherman, collector, supplier or landing site. It is assumed that once one is registered and contracted, then they are approved.

5.6.5: No Major non compliance has been detected by the ICS but there are specified corrective measures for all possible non compliances

5.6.6: There is a traceability system in place which if followed would be effective in cases of de-certification but there has not been such a case because the project is not yet certified.

5.7 Qualification of ICS Personnel & Conflicts of Interests

	Compliance criteria	Cat.	OK	PF	NF
5.7.1	Staff is aware of duties and responsibilities .	B-C	x		
5.7.2	The internal inspectors are sufficiently qualified to perform a thorough and objective inspection.	B	x		
5.7.3	Each internal inspector receives at least one training (participation & content documented).	C	x		
5.7.4	The ICS holds a conflict of interest declaration for each internal inspector and approval staff.	C	x		
5.7.5	Conflicts of interests should have been sufficiently avoided . No inspector or approval staff has inspected/approved his/her own fisherman , nor the fishing boats of his/her immediate neighbors, close friends, or family.	B	x		
5.7.6	If there have been conflicts of interest , it has not resulted in unfair assessment	A			x

5.8 Training of Fishermen, Collectors and Suppliers and Knowledge of Sustainable Fisheries standards

Brief description of fishermen training and extension activities

A number of training activities on different aspects of sustainable fishing for those involved in fishing have been conducted by several institutions and organizations. These include the Government's Fisheries Department, the Surface and Maritime Transport Regulator Authority (SMTRA), Kagera Development and Credit Revolving Fund, TUICO. Vicfish Ltd has also conducted specific training for fishermen, collectors and suppliers with specific reference to the Natural and Standards for Sustainable Capture Fishery and, to some extent, the Social Standards.

Evaluation

	Compliance criteria	Cat.	OK	PF	NF	N/A
5.8.1	Each fisherman has received at least one initial advisory visit or initial training course on sustainable fishing .	C	x			
5.8.2	The participation and content of training is documented .	C	x			
5.8.3	Fishermen are aware of the certification requirements (internal sustainable capture fishery standard).	B	x			
5.8.4	Fishermen are familiar with appropriate sustainable fishing methods .	C	x			

5.8.1: All fishermen either participated in the initial training during the development of the project or where at least briefed about the requirements of sustainable fishery at the signing of the contract

6 Fishing Operations

6.1 Fishing areas

Description	yes	no	Comments
ICS operator requires the each fisherman to fish from designated fishing areas	x		The fishermen can fish from the designed project fishing areas described in above in 4.1
Fishermen also fish conventionally (Parallel fishing)		x	Parallel fishing is not permitted in the project
Fishermen also fish from conventional fishing areas.		x	Fishing outside the limits of the ecolabeling project areas (identified and described in 4.1) is prohibited

	Control point if there is parallel fishing	OK	PF	NF	N/A
6.1.1	There is no parallel fishing .	x			
6.1.2	There is sufficient separation between sustainable fish and conventional fish.				x
6.1.3	Conventional fish is clearly labeled.				x

* Parallel fishing means that the fisherman also fishes conventionally (from non certified fishing areas)

6.2 Registration Period

- Description of requirements for registration and contracting of fishermen, collectors and suppliers under the ICS. How and When does a fisherman, collectors and suppliers qualify to be admitted to the project
- Overview of the process

There is no written explicit policy and procedures in the ICS for approving a fisherman, collector, supplier or landing site. It is assumed that once one is registered and contracted, then they have entered then project and have been approved (See also 5.6.2 & 5.6.3)

6.3 Overall Production System

	++	OK	--	N/A	Comments
Fishermen only involved in sustainable fishing (if required) or requirements for separation of sustainable fish from conventional fish in case of parallel fishing	x				Only involved in sustainable fishing
Handling of by-catches of non-targeted species	x				These are recorded and put to domestic use by the fishermen
No forbidden gear on-board	x				
Permitted fishing gear	x				
Handling of damaged gear	x				Damaged fish nets are used to make ropes that hold the boat metallic anchor and for fencing off of vegetable gardens (prevent free raging poultry for damaging the vegetables)
Storage of sustainable fish	x				
Documentation of fishing trips	x				
No use of paints containing tin on bottom of boats			x		Did not check this during this inspection

6.4 Contamination

	Control point	OK	PF	NF	N/A
6.4.1	There is no pesticide drift from neighboring farms into the fishing areas. Appropriate measures taken to prevent drift	x			
6.4.2	No contamination by irrigation water or rain run off / appropriate measures taken to minimize risk	x			
6.4.3	Other contamination risks minimized (malaria prevention programs, heavy traffic, industry)	x			
6.4.4	There are no prohibited inputs used in the fishery and fishing	x			
6.4.5	There are no prohibited materials used in storage and preservations of fish	x			

OK= Fulfilled (ok), PF= partly fulfilled → comments needed, NF= not fulfilled → comments & measures needed, N/A = not applicable

Remarks:

6.4: No pesticide drift was noted during this inspection but the quality of the rain runoff for all the inlets into this part of the lake was not determined. However, laboratory analysis results for tests that have been commissioned by the operator indicate that the water is free of pesticides and chemicals.

6.5 Post Harvest Handling (Fishermen, Collectors and Suppliers Level)

Description of fishing Procedures

Fishing is carried out at night by employed and contracted fishermen. Fishermen go out to the lake at between 3.00 – 5.00 p.m. to lay their gill nets. Nets are retrieved at between 6.00 – 9.00 a.m. the following day and the fish is delivered to the landing sites where the owners of the boats (collectors and suppliers) receive it from the fishermen.

Fishing period & average harvest estimates

Type of fish	Harvest period	Average yield of sustainable fresh
Nile Perch	All year round	345 tones per month

Remarks:

The average yield of 345 tones of catch per month is based on the average of the four months September to December 2008 during which the operator kept records for fish catch from the contracted suppliers, collectors and fishermen

Description of Post Harvest Processing Activities and Processing Ratio (if any processing is done at fishermen, collectors and/or Supplier levels)

There is no processing at fisherman, collector and supplier levels

	Control point	OK	PF	NF	N/A
6-5.1	No contamination during storage and processing				x
6.5.2	Only organic ingredients and/or permitted processing aids are used for processing				x
6.5.3	There is no risk of commingling with non-sustainable fish during post harvest processing				x

OK= Fulfilled (ok), PF= partly fulfilled → comments needed, NF= not fulfilled → comments & measures needed, N/A = not applicable

7 Buying, and Handling

7.1 Buying

Description of Buying Procedures

The operator buys fish from the suppliers. The suppliers fish is delivered to the factory in the operators collection trucks and offloaded at the factory, sorted and fish of acceptable size and quality is weighed in the presence of the supplier or his agent and recorded in the 'Raw material Receipt Note'. The supplier keeps his own records.

Evaluation

	Compliance criteria	Cat.	OK	PF	NF	N/A
7.1.1	At delivery/buying points the sustainable status of the fisherman is checked . Only the sustainable fish of certified sustainable fishermen is considered as "sustainable fish".	A	x			
7.1.2	The verification of the sustainable status is done on basis of the certified fishermen's list in possession of the Fish landing Site Monitor	A			x	
7.1.3	There is demonstrated evidence that fishermen only sell products from their own sustainable fish catch.	A	x			

	Compliance criteria	Cat.	OK	PF	NF	N/A
7.1.4	The amount of sustainable fish supplied is compared with the estimated yield . In cases of doubt, the product is kept separate until clarification is made.	B	x			
7.1.5	Deliveries/purchase are registered in a buying record that states at least the date, the fisherman's code, delivered quantity and quantity of By-catches.	A	x			
7.1.6	The fisherman is issued a receipt , which indicates the fisherman's name (or code), delivered quantities, and By-catches.	B			x	
7.1.7	Buying personnel are trained, knowledgeable, and competent in implementing the sustainable fisheries buying rules (as outlined in the manual).	B	x			
7.1.8	The inspection confirms that the product flow is traceable and consistent and that the purchase has been performed correctly, according to the certification status of the fisherman.	A	x			

OK= Fulfilled (ok), PF= partly fulfilled → comments needed, NF= not fulfilled → comments & measures needed, N/A = not applicable

Remarks:

7.1.2: Each landing site monitor appears to use the color of the boats and the project code number to identify the fishermen in the project. Even the catch analysis data per boat per trip that is used by the operator to document the fish catch does not contain the name of the fishermen who fished using the boat on a particular day.

7.1.6: No receipts are issued to fishermen for the harvested fish. The fisherman, collector, supplier and operator, each keeps his own record. However, the fishermen are contented with the type of record keeping as they have not had any complaints. These inspectors consider that the 'Catch analysis data per boat per trip' is an adequate daily record of the fish landed per boat.

7.2 Handling at certified landing sites (or landing sites to be certified)

Description of handling of the sustainable fish at landing site

At the landing site, each boat catch is recorded by the fishermen, the collector, supplier and the Operator's landing site monitor (The Landing site monitor records the details in the 'Catch Analysis data per Boat per Trip' form). The collectors then pass on the fish to the supplier who places it in his transport boat and ices it for transportation to the factory Jetty (landing site). In case of offshore landing sites, the transport boats may spend a number of days on the lake until a reasonable quantity of fish has been obtained before they deliver it to the Operator's jetty. In case of onshore landing sites, the supplier places the fish in large collection bins and ices it. When sufficient quantities have been obtained, the Operator's trucks collect it from the onshore landing sites.

Evaluation of handling procedures in general

	Compliance Criteria	Cat	OK	PF	NF	N/A
7.2.1	The sustainable fish is kept separate from any conventional fish and fish product. The separation system must be clear all through the production chain	A	x			
7.2.2	If in-conversion products are for sale as "in-onversion", then these products have to be kept separate from all Sustainable capture fish non- Sustainable capture fish (conventional) products at all times.	A	x			
7.2.3	During storage and transport the sustainable fish are labeled at all times as "sustainable fish".	B			x	
7.2.4	For transport to another unit the following additional information is stated on label/accompanying papers: name of owner of product, "certified by Naturland", and lot number (if applicable).				x	
7.2.5	Storage area labeled "sustainable fish". If conventional fish and or "sustainable fish" are stored unsealed in the same area, there has to be a clearly defined, well labeled, and physically separate section of the room allocated to the "sustainable fish".	B-C			x	
7.2.6	Warehouse personnel are trained, knowledgeable, and competent in implementing the "sustainable fish" storage rules.		x			
7.2.7	There is no fumigation, irradiation/ionization, of the products at any stage of the flow of the sustainable fish.	A	x			
7.2.8	Facility pest management is in compliance with the standards. The "sustainable fish" is not contaminated.	A	x			

OK= Fulfilled (ok), PF= partly fulfilled → comments needed, NF= not fulfilled → comments & measures needed, N/A = not applicable

7.3 Product Flow Verification all through from fishing grounds and through the landing site to the processing factory

Product & period	Documents used	Content	Comments
Freshly caught Nile Perch whole fish - daily	Catch Analysis Data Per Boat Per trip	Contains information of daily fish catch including by catch per registered boat	Does not contain name of the fishermen
Freshly caught Nile Perch whole fish – When there is movement of fish from landing site to factory	Beach Management Unit Certificate (BMU certificate)	Contains amount of fish loaded from a landing beach for transportation to the factory	It is some form of fish movement permit for fish being taken from a landing site to the factory

8 Compliance Assessment and Conclusions by the Inspector

8.1 Compliance with previous conditions

Code	Identified non-compliance	Conditions that were given in the previous certification decision	Deadline	Status
-	-	-	-	-

Remarks:

None: this was the first inspection

8.2 Non-compliances found during this inspection and the proposed corrective Measures

Note to the operator and inspector: *The corrective actions set by the inspector are recommendations only and may be overturned, revised or added to by the Naturland*

Code	Identified non-compliance	Corrective measures	Deadline
5.4.4	The Basic data form does not contain details of age of each fisherman.	<ul style="list-style-type: none"> Revise the structure of the basic data form to provide for recording of the age of each fisherman Record the age of each fisherman in the project. 	Before the next external inspection
5.4.10	The fishermen 'List of Suppliers-Collectors-Fishermen' does not contain fisherman date of joining the project, fishing boat code number, landing site, last date of internal inspection, decision of internal inspection and approval status.	The 'List of Suppliers-Collectors-Fishermen' should be formatted and filled with the information about the fisherman date of joining the project, fishing boat code number, landing site, last date of internal inspection, decision of internal inspection and approval status.	Before the end August 2009
5.4.11	There is no 'Sanctioned Fishermen and Boat Owners list'.	Create a 'Sanctioned Fishermen and Boat Owners list' and record in it details of fishermen and boat owners who are	immediately

		sanctioned including reasons for the sanctions.	
5.5.1	The number of boats (Only 10 boats, which is about 20 -30 fishermen) to be internally inspected every year is inadequate.	Each boat and fisherman should be internally inspected at least once every year.	Before the end August 2009
5.5.9 & 5.5.10	The current system of estimating fish harvest per boat is unreliable.	Monitor and investigate any large divergences from the average daily deliveries of all boats at any landing site since boats delivering at the same landing site fish from the same fishing grounds and use then similar fishing gear and lay and retrieve their nets at almost the same time.	immediately
5.6.1, 5.6.2, 5.6.3 & 6.2	There is no explicit policy and procedures for approving a fisherman, collector, supplier or landing site into the ecolabeling project.	Develop a policy and procedures for approving a fisherman, collector, supplier or landing site into the ecolabeling project.	Before any new fisherman, collector, supplier or landing site is accepted to participate in the ecolabeling project.
7.1.2	Landing site monitors do not use list of approved fishermen to identify fishermen in the project. The 'Catch analysis data per boat per trip' that is used by the operator to document the fish catch does not contain the name of the fishermen who fished using the boat.	The Landing site monitors must be supplied with a list of approved fishermen at their respective landing sites and must use it to identify approved fishermen before landed fish is accepted in the project. The 'Catch analysis data per boat per trip' must also record the names of the fishermen landing the fish in the registered boat on that day	Immediately

8.3 Certification Summary

→ Overview of certified Lake Victoria Nile Perch Sustainable Capture Fishery on Lake Victoria

No. of fishermen	Number of fishing boats	Number of collectors	Number of Suppliers	Estimated monthly fish catch (Maximum)	Recommended certification status
698	270	49	16	*395 tons	Sustainable capture fishery and fish

Remarks:

Maximum monthly catch for the period September to December 2008 was 359 tons in December 2008. The maximum monthly catch of 395 tons set for this production is estimated based on the total December 2008 catch plus 10%.

8.4 Follow up of this inspection

These tables will be used for follow up on previous inspections (if applicable) and follow up on this inspection during future inspections. The actions are not recognized as conditions from the certifier. The inspector recommends the following issues, who should be responsible for them and when they should be carried out. Add pages in appendix if necessary.

No	Action	Section	Who	When
1	Check the chemical composition of paint used on the fishing and collector fish boats	5.3.2	Inspector	At next inspection
2	Follow up of measures taken to correct the non compliances that have been identified in 8.2 above	8.2	Naturland and inspector	<ul style="list-style-type: none">• These indicated as requiring immediate action require document verification as soon as the operator has reported the implementation of corrective measures• The rest can be followed up during a spot inspection

<i>Charles Walaga</i>	Kampala	11 th February 2009
<i>Signature of the Inspector:</i>	<i>Place</i>	<i>Date</i>

9 Annexes

- 1 Vicfish ICS Manual (Jan 2009)
- 2 List of Suppliers-Collectors-Fishermen
- 3 Naturland Inspection Checklist: Internal Control System (7.2)
- 4 Naturland Deviation Report