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Contribution of Sustainable Fisheries to the Blue Economy of the Eastern Africa, Southern Africa and Indian Ocean region (E€OFISH programme) – Mid-Term Evaluation



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**Contribution of Sustainable Fisheries to the Blue Economy of the
Eastern Africa, Southern Africa and Indian Ocean region (E€OFISH
Programme) – Mid-Term Evaluation**

Request for Specific Contract No. SIEA-2018-9521

Final Report

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DISCLAIMER

This report has been prepared with the financial assistance of the European Commission. The views expressed herein are those of the consultants and therefore in no way reflect the official opinion of the European Commission.

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List of abbreviations

ABNJ	Areas Beyond National Jurisdiction
AfDB	African Development Bank
AFRM	African Fisheries Reform Mechanism
AU-IBAR	Inter African Bureau for Animal Resources of the African Union
BE	Blue Economy
CA	Competent Authority
C&V	Communication and Visibility
CBD	Convention on Biological Diversity
CBFM	Community-Based Fisheries Management
CCRF	Code of Conduct for Responsible Fisheries
COMESA	Common Market for East and Southern Africa
CPUE	Catch Per Unit of Effort
DG MARE	Directorate-General for Maritime Affairs and Fisheries
DMRO	Duly Mandated Regional Organizations
EA-SA-IO	Eastern Africa, Southern Africa and the Indian Ocean (region)
EAC	Eastern Africa Community
EAFM	Ecosystem Approach to Fisheries Management
EDF	European Development Fund
EEZ	Exclusive Economic Zone
EFCA	European Fisheries Control Agency
EU	European Union
EUD	European Union Delegation
DWF	Distant Water Fishing
FAO CCRF	FAO Code of conduct for responsible fisheries
FAO IPOA- IUU	FAO International Plan of Action to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing
FPAOI	Federation of Artisanal Fishermen of the Indian Ocean
FAO UN	Food and Agriculture Organization of the United Nations
FGD	Focus Group Discussion
HOA	Horn of Africa
HR	Human Resources
IGAD	Intergovernmental Authority on Development
IO	Indian Ocean
IOC	Indian Ocean Commission
IOTC	Indian Ocean Tuna Commission
IUU fishing	Illegal, unreported and unregulated fishing
IPMU	Integrated Programme Management Unit
KAZA	Kavango and Zambezi
KII	Key Informant Interviews
LSF	Large Scale Fisheries
LTE	Long Term Expert
LT	Lake Tanganyika
LTA	Lake Tanganyika Association
LVFO	Lake Victoria Fisheries Organization
LV	Lake Victoria
MCS	Monitoring Control and Surveillance
MSME	Micro, Small and Medium Enterprise
MTE	Mid-term evaluation
NFP	National Focal Point
NKE	Non Key Expert
NNF	Namibia Nature Foundation
OECD/DAC	Organization for the Economic Cooperation and Development/Development Assistance Committee
PE	Programme Estimate
PSMA	Port States Measures Agreement
PRSP	Projet Régional de Surveillance de Pêche
RCU	Regional Coordination Unit
REC	Regional Economic Community
RFBs	Regional Fishery Bodies
RFMOs	Regional Fisheries Management Organisations
SADC	Southern African Development Bank
SEY	Seychelles

SDIS	Small Developing Island States
SIOFA	Southern Indian Ocean Fisheries Agreement
SSF	Small Scale Fisheries
STE	Short Term Expert
SWIOC	South West Indian Ocean Fisheries Commission
TAT	Technical Assistance Team
UNEP	United Nations Environment Programme
UNDP	United Nation Development Programme
UNECA	United Nation Economic Commission for Africa
VMS	Vessels Monitoring System
VG-SSF	FAO's Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries in the Context of Food Security and Poverty Eradication

Executive Summary

The ECOFISH Programme addresses issues and challenges of both marine and inland fisheries in the Eastern Africa-Southern Africa and African Indian Ocean Countries (EA-SA-IO) region. Its total costs were estimated EUR 29, 4 million, and include funding, under the 11th EDF Regional Indicative Programme for the EA-SA-IO Region, to the amount of EUR 28 million over five years. The Programme builds on the results, lessons learned and best practices of the SmartFish Programme, funded under the 10th European Development Fund, and previous EU funded interventions targeting fisheries.

The Programme is structured in three results i.e.,

1. Regional policies and institutional frameworks are enhanced to secure more sustainable fisheries management and contribute to marine biodiversity and climate resilience.
2. Strengthened capacity to prevent, deter and eliminate IUU fishing in the EA-SA-IO region.
3. Concrete fisheries management and governance initiatives in small-scale inland and marine fisheries are supported with the possibilities of replication at the regional level.

Implementation encompasses five Work Plans, 1: LVFO, 2: LTA, 3: Marine fisheries, 4: Call for proposals (for grant to support inland and marine SSF projects), and 5: cross-cutting contracts/ technical assistance/grants to member states competent authorities (CAs).

Following EU procedures and priorities, a mid-term evaluation was carried out over the second semester of 2022 by a team of two senior fisheries experts.

The MTE followed evaluation questions (EQs) provided in its ToR (to which the MTE team added a further two) for its findings, and, for its conclusions, the six standard OECD/DAC evaluation criteria relevance, coherence, efficiency, effectiveness, impact and sustainability, complemented by the EU criterion value added. Findings and conclusions were the basis of key lessons learned, and of recommendations, overall and operational. The MTE travelled to the Region from 28th September to 27th October visiting Mauritius, Madagascar, Seychelles, Kenya, Burundi, Tanzania, Mozambique and Namibia .

Findings, lessons learned, conclusions and recommendations are based, above all, on using a toolbox for participatory appraisals, in particular Focus Group Discussions (FGD) and Key Informant Interviews (KII). Consultations were held with regional institutional stakeholders, national CAs, grass root level private sector operators and socio-professional organizations and NGO/CSO non-state actors, face to face or virtually. The MTE team developed a structured interview format which was distributed, together with the Inception and Desk Report, to stakeholders at the beginning of the mission.

As the EQs were not formulated following the logic and structure of the OECD/DAC criteria, MTE responses to them are considered, selectively, in the elaborations of the criteria presented below.

Relevance

The MTE team concludes that the Programme, its objectives, results, and work plans were and are relevant for the issues and challenges of fisheries in the participating countries and in the region, reflecting the present situation and trends of fisheries globally. This finding is relativized by the potential incompatibility of growth orientation, implying increased effort and fishing pressure included in the overall objective, and the need for responsible and sustainable fishing in consideration of depleted, overfished stocks which were attested for practically all coastal and inland water resources and for many of the straddling stocks of tuna and tuna like species (see EQ 1).

The contribution to the work plans 1, 2 and 3 under Result 1, and achievements under Result 2 are relevant for the Programmes goals but can only mitigate problems by improving frame conditions for sustainable resource management, supporting training, capacity building, and facilitating conducive institutional and normative frameworks, with the perspective of enforcing the latter. Support to inland fisheries resource management efforts of the two inland RFMOs, LVFO and LTA was and is relevant and appropriate, despite and, maybe, because of the constraints encountered (see EQ 3).

Regarding achievement attained to date and planned under Result 2, the MTE team considers it relevant, as it deems them contributing to conducive conditions for management (see EQs 3, 7 and 14). The relevance of the joint patrols carried out to date was increased significantly via the C&V effort of the Programme. Relevance of the Programme is attested, by the MTE team, for the SSF projects supported by grants under result 3. Here, relevance is significant because the Programme supports sustainable

fisheries at grass root level, i.e., the only level where policies and strategies become tangible, visible and yield results (see EQ 8).

Coherence

Programme goals are coherent, and in line with the UN Sustainable Development Goals (SDGs): 1. End poverty in all its forms everywhere in the world, 2. End hunger, achieve food security and improved nutrition and promote sustainable agriculture, and, most relevant for the MTE, SDG 14: *Conserve and sustainably use the oceans, seas and marine resources for sustainable development*¹. Regarding the latter, goals are also coherent with other international postulates e.g., the Aichi targets *inter alia* 5, 6, 11 and 15² of the CBD. At regional level, Programme goals are in coherence with the African BE discussed in several of the EQs above.

Effectiveness

The Programme's objectives and results provided have been attained to varying degrees of effectiveness. With regards to the postulated enhancement of regional policies and institutional frameworks, and of leveraging regional economic collaboration and cooperation with DMROs and RFBs under result 1 of the Programme, the MTE team has not been provided evidence for effectiveness of respective Programme efforts to date (see EQ 5). Regarding Programme governance and management, the complex and complicated multi-layered design of the Programme also see the risk that the implied efforts sap the limited HR and logistic capacities the TAT, IOC and implementing partners alike (see EQ 2).

The MTE team commends the efforts of the Programme to contribute, as a Cross-Regional Initiative towards sustainable fisheries of the region, but still retains doubts as to whether ECOFISH has the calibre of leveraging, not to talk of exerting effective collaboration and cooperation with and among political/economic entities as the DMROs, RFMOs, RFBs and national CAs (see EQ 5).

Contributions to the work plans 1 and 2 under result 1 (see EQ 3) have been effective but can only mitigate problems, within the limits of HR, duration and logistic and financial means of the Programme. For MCS capacities supported by the Programme to yield effective results, however, they need to be applied and further developed, learning by doing, during frequent regional patrols. The MTE team could not evidence ability of the Programme to effectively influence political will and ensure continuing joint patrols without external funding (see EQ 7, 14). The implementation of result 2, strengthening capacity to prevent, deter and eliminate IUU fishing, has been effective with respect to contributing to conditions conducive to enforcement of compliance by developing respective regional protocols, standards, and procedures. Efforts to facilitate much needed and sufficiently deterrent national prosecution and sanctioning of infringements as part of revamped fisheries governance frameworks of fisheries crimes and fraudulent catch reporting in areas under national jurisdiction are in the pipeline.

Concerning the Marine Fisheries work plan under result 1, no effective and tangible support to legal and regulatory frameworks of SS and artisanal coastal fisheries attributable to direct Programme intervention beyond the SSF grant projects under result 3/work plan 4 was recorded. Regarding the latter, the MTE team concludes that, overall, effectiveness can be attested, with the potentials of spill overs, multiplication, impact, and sustainability.

Efficiency

Virtually all Work Plans are in some stage of delay. Regarding Work Plan 1, the LVFO project managed to achieve the planned outputs at least partially through a combination of virtual and in-person interventions (EQ 3) even though the level of fund utilisation is lower than foreseen (just over 20% against 40% to be committed for the Actions planned by 2021). Regarding Work Plan 2, the LATAFIMA Project suffered major delays, mainly due to the inability of FAO and its team to provide the necessary resources (both human and financial) in due time. The level of expenditure is at a low level in line with the low level of implementation, with approximately 28% of the budget disbursed, with a significant imbalance in favour of expenditure for Human Resources and travel.

Regarding the IOC Marine Fisheries Work Plans under results 1 and 2, the MTE team noted that during the early years of the Programme, the implementing agency, IOC, had difficulty in getting the programme

¹ <https://www.globalgoals.org/goals/14-life-below-water/>

² Aichi Target 5: Habitat loss halved or reduced; Aichi Target 6: Sustainable management of marine living resources, Aichi Target 11: Protected areas increased and improved, Aichi Target 15: Ecosystems restored and resilience enhanced

started. In the 2018 report is stated that the IOC has faced deficiencies in its efforts towards marine coastal fisheries management in the Eastern African-Southern African-Indian Ocean (EA-SA-IO) region. The 2018 report highlights weak engagement and support from the MCS expert, leading to a delay in the full reactivation of the MCS. The IOC Secretariat tends to overburden the Technical Assistance Team (TAT) and the IPMU with administrative and technical responsibilities, which may compromise the performance of ECOFISH.

The 2019 report indicates a lack of understanding of the scope of ECOFISH as a cross-regional initiative, challenging for TAT and IPMU.

In 2020 reports is stated that the IOC has faced some shortcomings in its efforts towards the Marine Coastal Fisheries Management in the EA-SA-IO region. The IOC Secretariat's weak engagement and support from the MCS expert have led to a delay in the full reactivation of the MCS, mainly PRSP. There is a tendency for the IOC Secretariat to overburden the TAT and the IPMU with administrative and technical responsibilities, which may compromise the performance of ECOFISH. Also, there is a lack of understanding of the scope of ECOFISH as a cross-regional initiative, challenging for TAT and IPMU.

In 2022 report is stated that IOC has faced several shortcomings and incompetencies as described in the text.

Overall, while the TAT has performed well, the IOC Secretariat's underperformance and other structural shortcomings have hindered the implementation of various projects and initiatives.

The MTE also noted a certain grade of disagreement among the TAT, the EUD and the IOC. According to TAT reporting, the IOC Secretariat does not acknowledge the extra efforts, but claim them as a right and became more demanding. As a result, there was a discussion between the latter (IOC Secretariat) and the EUD Mauritius regarding the TAT work scope. This applies also to strategic tools advocated in the context of the Marine Fisheries Work Plans, such as the Blue Economy Fisheries Satellite Account, or the Regional Fisheries Climate Observatory. The former lacks its *conditio sine qua non*, comprehensive and reliable data, and the latter would duplicate a plethora of existing perennial CC mechanisms, with both unlikely to justify implied anticipated efficiency.

Regarding Work Plan 4 under Result 3 (SSF pilot/lab projects), all projects visited by the MTE team demonstrated evidence of efficiency in their implementation, as well as of funds commitment and expenditure, particularly those projects that apply a participatory local development strategy (see EQ 8).

Impact

Given that the evaluated Programme has incurred considerable delays during the early stages of implementation, its impact, in the sense of the OECD/DAC criterion, can be assessed tentatively at the very best, and with regards to longer term higher-level effects e.g., multiplication of positive achievements and larger scale application of lessons learned only.

Intended or unintended, higher-level effects were not recorded, possibly because Programme interventions did not include subsidies or other perverse incentives.

Sustainability

Sustainability of time bound, externally financed development assistance interventions is notoriously difficult to assess, especially at mid-term. Uncertainty of sustainability leads many donors to obligatory request an exit strategy in programme/project design. For the Programme, the assessment of sustainability by the MTE team allows a variety of conclusions. Regarding enhanced regional policies and institutional frameworks and leveraging of effective collaboration and cooperation with DMROs and RFBs postulated under result 1. Outcomes will most probably not be sustainable beyond the Programmes completion, for reasons discussed in the respective EQs in the report. Similarly, impact of training and capacity building, and facilitating conducive conditions for sustainable sector management and MCS will dissipate if acquired skills and strengthened capacities are not applied and conducive conditions are not used for the benefits of sustainable resource management.

The tangible and visible results achieved by the SSF projects allocated grants under result 3 have a good chance of being sustainable, based on the fact that their principal actors are part of the private sector, whether SSF, artisanal fishers or value chain operators and MSMEs/MSEs. Development assistance extended to them, in a participatory way and addressing them individually or via legitimate

and representative community and socio-professional organizations are, in general, more sustainable than institution and capacity building at national and regional levels.

Value added

The Programme, by achieving its objectives, would add value to:

- EU's engagement to strengthen the process of moving towards enhanced regional cooperation and integration vis-à-vis governing and managing fishery resources regionally and improving and harmonizing regional and national policies.
- EU's efforts to improve transboundary coordination and cooperation mechanisms, MCS and joint patrolling for illegal, unreported and unregulated (IUU) fishing, training and capacity building of CAs, and pilot actions promoting co-management and community fisheries management.
- EU support to improve governance and increased private sector and community participation in natural resource ecosystem and biodiversity management at the sub-national and local level, enhancing replicable environmental and socio-economic improvements.

From the findings of the MTE some “**Lessons Learned**” can be proposed. A central lesson is that the root problem of most coastal and inland fisheries in the EA-SA-IO region and beyond is lack of political will and good sector governance. Political will and good sector governance, especially with respect to limiting regulating access to fishery resources, is the *conditio sine qua non* for safeguarding them and the ecosystems they depend on for future generations and for sustainable economic development. Only by safeguarding and restoring abundance and diversity of living aquatic resources and critical habitats can maintain or increase their social, economic, and cultural contributions to local economies, fishers and their communities and the fisheries value chains *eo ipso*. And only good governance will foster willingness of stakeholders to participate in fisheries management processes for the common good. Furthermore, participation in fisheries management and enforcement of compliance will be supported by communities only if stocks have recovered to levels where they are providing better catches and tangible benefits to their members and alleviate poverty.

Last paragraph is complemented by the second learned lesson, that participation in CBFM or co-management are, probably, the only efficient tools for enabling sustainable management of SSF and artisanal fisheries, inland and marine alike. Both CBFM or co-management depend on strong, accepted, legitimate, inclusive (gender, youth and the elderly) and representative institutions. Under open access regimes where the theorem of the “tragedy of the commons” is ever present, building such grass root institutions is a major challenge.

Lessons learned during the MTE do not prove but support the hypothesis extended in the MTE findings i.e., that regional efforts by donor dependent and time bound projects are unlikely to sustainably leverage change with agendas and dynamics of regional organisations with effective positive impacts on SSF. This does however not apply to regional cooperation in conserving and managing tuna and tuna like species, in EEZs and ABNJ, through the enforcement of national legal and regulatory provisions and applicable RFMO's resolutions.

Here, regional solidarity and harmonization of access conditions are the only feasible way out of the present situation where foreign DWF fleet and flag and/or port states continue to apply a “divide and rule” approach to secure access to the high value fisheries resources of the WIO. To have all countries of the EA-SA-IO region sharing the straddling stocks of tuna and tuna like species and agree on mutually agreed and collectively implemented harmonized conditions appear far-fetched at the time of this writing but is, probably, the only option for the long-term conservation and sustainable resource use.

The MTE formulated **Overall and Operational Recommendations**. While the former are focused on the overall program, the latter focus on each specific program. The **first overall recommendation** concerns an extension of the Programme. The rationale for extending the Programme can be outlined as follows:

- The necessity to extend the duration of the programme³ considers the delays incurred in the early stages of the Programme, regardless of whether caused by COVID 19 and travel restrictions

³ According to the Action Document for Contribution of Sustainable Fisheries to the Blue Economy of the Eastern Africa, Southern Africa and Indian Ocean region, extensions of the implementation period may be agreed by the Commission's authorizing officer responsible by amending this decision

imposed by the pandemic, late recruitment of regional or early replacement of international staff, administrative hurdles, or hick ups caused by some of the implementation arrangements and Programme architecture. They have affected the state of delivery to date, delivery in the “pipeline”, and the need for further delivery towards achieving results.

- Another, at least equally eminent reason for extending the project duration, is the sheer magnitude of the combined tasks of the *multifaceted and cross-regional* Programme, as listed in the Technical Handbook⁴, under three results, five work plans and a respective plethora of strategic actions.

The **second overall recommendation** of the MTE team is to base a revised, reorientated Programme, and any extension of it, on comprehensive stakeholder consultations, to achieve the acceptance and ownership essential for getting them on board and ensure consensus. The length of the extension should be decided during the consultations; in the view of the MTE an extension of 18 months appears appropriate. The overall goal of the consultations should be to make the Programme “leaner”, not necessarily “meaner”, realistically taking Programme resources, especially the LTE HR of fisheries management, MCS and C&V, and the remaining NKE and STE resources into account.

This recommendation includes a paradigm shift from production and growth to sustainable use and protection of resources, replacing high flying postulates for prosperity and wealth creation by “unleashing” the potential of a sector which is ailing, at best, with severely depleted stocks, some of them on the brink of collapse. It is based on findings of the MTE team which indicate receptiveness, on the part of the stakeholders consulted, of prioritizing sustainable use of resources and the protection of aquatic ecosystems before short term financial and economic gains. For a reoriented Programme this would mean to prioritize the SSF projects under result 3, in concert with the facilitation of national sector management plans included under result 1.

Operational recommendations are offered for the components and work plans specifically. Regarding Programme management and governance structures, the MTE recommends reviewing the present complex and complicated management and governance structure as part of the effort to make the Programme “leaner”. Focussing Programme support on sustainable utilization and management of living aquatic resources instead of attempting institutional strengthening of DMROs and FMBs *sensu latu* would be more in line with Programme resources and subject matter expertise.

An operational recommendation regarding work plan 1 proposes to continue and widen Programme support for Lake Victoria. This should include addressing eminent problems as the need to protect tilapia breeding grounds including by reducing sand mining, pollution including plastic pollution and pollution from cage culture and raise awareness of the existential problem, for the lake and connected water bodies and aquatic ecosystems, caused by the release of Chinese silver carp in Uganda. Furthermore, the Programme should support a buy-out scheme to limit access to LV fisheries resources following the suggestions of LVFO outlined above, i.e., piloting a right based management regime giving preferential access (permission to fish) to local fishers and restricting number of vessels owned by fishers.

Regarding Lake Tanganyika, work plan 2, the Programme is recommended to take an active role in resolving the present impasse caused by lack of responsiveness of FAO, which stymies the effective and efficient use of funds allocated by the Programme. This recommendation is based on the conclusion of the MTE that it is well within the realm, if not the responsibility, of the Programme to leverage the use of funds allocated according to their intended use with LATAFIMA. Finding a solution, including by changing the constellation of the present LATIFIMA set-up, is conditional for valorising Programme efforts creating conducive conditions for transboundary fisheries management and MCS.

With respect to the marine fisheries work plans under results 1 and 2, the MTE recommends following and further operationalizing the differentiation of resource management and MCS of LS industrial fisheries of tuna and tuna like fisheries, and of inland and marine SSF and artisanal fisheries. For the former, and the respective efforts postulated the marine fisheries work plan under result 1 (, see EQ 3), a nexus should be established with the SSF grant projects under result 3, and IOC-PRSP support to marine SSF, by streamlining efforts to facilitate development of effective management plans, fostering horizontal integration and learning.

and the relevant contracts and agreements; such amendments to this decision constitute non-substantial amendment in the sense of Article 9(4) of Regulation (EU) 2015/322.

⁴ Op. cit.

For the IOC-PRSP the MTE recommends the Programme continuing to advocate its institutionalization, with member states pledging sustainable budgetary and logistic support for regionally harmonized management of straddling stocks. This will require concerted political will to enforce compliance with, ideally, donor independent financing, and transparency and accountability of supplementary external budget support which, at the short and medium term, appears inevitable.

Regarding the grass root level SSF projects allocated grants under result 3, work plan 4, the MTE recommends the Programme to continue supporting the present, and, possibly, more grass root SSF projects in the EA-SA-IO region. The recommendation encompasses the option to reallocate budgetary provisions, saved by making the Programme “leaner”, for this purpose. Continuing and extended support should be preceded by a comprehensive and fully participatory survey *ex post* evaluation of existing projects, and a corresponding *ex ante* evaluation of additional projects⁵. This effort is expected to result in selection criteria for grant allocation following the OECD/DAC criteria, performance indicators and sustained monitoring developed on the base of the surveys.

It is also recommended that Programme support should facilitate sharing past experiences, continuous learning, and exchanging empirical knowledge. However, The MTE discourages building yet another digital regional platform to serve this purpose, because to service such platform would reduce the already limited HR capacity and time available to “boots on the ground” for much needed grass root level work. Instead, a yearly regional meeting, over time sufficient to exchange experiences and lessons learned “face to face”, is recommended, as well as increased focus of the C&V component of the Programme to raise project profiles and to increase chances of multiplication and impact as discussed in 3.2 above.

⁵ According to the conclusion of the MTE that, while management measures and MCS applied solely “from above” may be an option for MCS of LS and may be the only one for DWF vessels, will fail in inland and marine SSF and artisanal fisheries if it not done participatory, to foster acceptance and ownership of management measures.

1. Introduction

1.1. Description of the intervention

The ECOFISH Programme (the Programme hereafter) is the latest EU supported project addressing issues and challenges of both marine and inland fisheries in the Eastern Africa-Southern Africa and African Indian Ocean Countries (EA-SA-IO) region⁶. Its total estimated costs are EUR 29, 4 million, and includes funding, under the 11th EDF Regional Indicative Programme for the EA-SA-IO Region, to the amount of EUR 28 million over five years⁷. The Programme builds on the results, lessons learned and best practices of the SmartFish Programme⁸, funded under the 10th European Development Fund. It is designed as a cross-regional and multi-faceted Programme with the overall objective is *to enhance equitable economic growth by promoting sustainable fisheries in the EA-SA-IO region*. Its specific objective is to support sustainable management and development of fisheries *to contribute to poverty alleviation, food and nutrition security, while addressing climate change resilience and enhancing marine biodiversity*⁹.

The Programme is structured in three results i.e.,

4. Regional policies and institutional frameworks are enhanced to secure more sustainable fisheries management and contribute to marine biodiversity and climate resilience.
5. Strengthened capacity to prevent, deter and eliminate IUU fishing in the EA-SA-IO region.
6. Concrete fisheries management and governance initiatives in small-scale inland and marine fisheries are supported with the possibilities of replication at the regional level.

Implementation encompasses five Work Plans, 1: LVFO, 2: LTA, 3: Marine fisheries, 4: Call for proposals (for grant to support inland and marine SSF projects), and 5: cross-cutting contracts/ technical assistance/grants to member states CAs.

According to the 6-Month Interim Report 1.7.2022 to 31.12.2020 by the Technical Assistance Team (TAT) led by the INCATEMA consortium¹⁰, the ECOFISH programme started officially in July 2019 with the mobilisation of the TAT in Mauritius. According to TAT reporting, the Programme has been operational since July 2020, with the delay attributed to the time needed for the IOC Secretariat setting up relevant management structure and the recruiting administrative and technical staff, and Covid 19 related travel, social and sanitary restrictions¹¹.

The Programme is managed by the European Union (EU) Delegation in Mauritius and implemented by the IOC Secretariat, in collaboration with the Duly Mandated Regional Organizations (DMRO) COMESA, EAC, IGAD, IOC and SADC¹², the Regional Fisheries Management Organization (RFMOs) i.e., LTVO and LTA (inland), and IOTC and SIOFA (marine), the regional fisheries body (RFB) SWIOFC, and development partners such as AU-IBAR, FAO and UNEP. For results 1 and 2, PEs were signed with the Indian Ocean Commission (IOC) as the Regional Authorising Officer, result 3 is directly managed by the EUD of Mauritius.

Following EU procedures¹³, a mid-term evaluation (MTE hereafter) was carried out by two senior fisheries experts recruited by OCA Global¹⁴, supported by the consortium leader, Project Planning and Management Ltd¹⁵ in mid-2022. The purpose of the MTE was the *assessment of achievements, quality*

⁶ E.g., the IOC/IOTC/EU RTTP Regional Tuna Tagging Project 2005 to 2009 or the IOC-implemented SmartFish Programme financed under the 10th EDF; see also Schmidt, U.W., Hosch, G., The Regional Pilot Programme for Monitoring, Control and Surveillance (MCS) of Large Migratory Species in the Indian Ocean (9 ACP RSA 1), financed under the 9th EDF; or

⁷ EC, Action Document for Contribution of Sustainable Fisheries to the Blue Economy of the Eastern Africa, Southern Africa and Indian Ocean region, Annual Action Programme 2018

⁸ Agrotec, 2012. Implementation of a Regional Fisheries Strategy for the Eastern-Southern Africa and Indian Ocean Region. SmartFish Program. European Union, Indian Ocean Commission, 2012. 6 Program SmartFish Rapport SF/2013/38. <https://agtinternational.it/smartfish-programme/>

⁹ idem

¹⁰ Incatema, Technical Assistance for the Contribution of Sustainable Fisheries to the Blue Economy of Eastern Africa, Southern Africa and Indian Ocean Region – ECOFISH Programme Contract no.: FED/2019/408-4236-Month Interim Report 31. 6. 2022

¹¹ The IOC/EDF Programme Estimate defines the operational period of the Programme from 13 September 2019 to 12 September 2024 with a closure period from 23 September to May 2025

¹² Together with the EUD Mauritius, they constitute the Programme Reference Group (RG)

¹³ Strengthening the foundations of Smart Regulation – improving evaluation” - http://ec.europa.eu/smart-regulation/docs/com_2013_686_en.pdf

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¹⁵ Project Planning and Management Ltd. 98A Knyaz Boris I St. Sofia, Bulgaria, E-Mail: ppm@ppm.bg

of delivered services and attainment of the results of interventions in the context of an evolving cooperation policy¹⁶.

The MTE team underlines that the findings, lessons learned, conclusions and recommendations expressed in the following are those of the consultants alone.

1.2. Relevant country/region/sector background of the evaluation

According to SOFIA 2022¹⁷, 34.2 % of the fish stocks of the world's marine fisheries are fished at biologically unsustainable levels compared to only 10 % in 1974¹⁸. The dramatic decrease of the stock abundance and diversity is caused by overcapacity of fishing fleets, resulting overfishing, IUU fishing and progressive degradation aquatic ecosystems, marine and inland. To the sector internal problems, external threats to the coastal environment are decreasing dramatically. Threats are related *inter alia* to pollution including plastic pollution, encroachment on critical habitats as floodplains, mangroves, coral reefs and seagrass beds, unchecked development of tourism, especially mass tourism, and population pressure increasing pressure on aquatic resources.

Most countries in the EA-SA-IO region have greater fish resources in their inland than in their marine fisheries domains, with the obvious exception of islands states. Almost all¹⁹ of the inland and 80-90 % of inshore and coastal marine capture fisheries are exploited by small scale fisheries (SSF), often termed, anthropologically incorrect, "subsistence" fisheries, and traditional artisanal fishing. Offshore marine resources are harvested by large scale (LS) industrial fisheries and semi-industrial vessels, many of which are often managed *de jure* but seldomly *de facto*., according to the findings of the MTE and confirmed by resource persons consulted.

Most inland and coastal fisheries resources are poorly regulated. Management plans and legal and regulatory provisions are, where they exist, rarely enforced, either because of lack of general logistics and MCS capacities, or of political will to enforce by prosecution and deterrent sanctions. As a result, they remain under open access regimes, with stocks severely overexploited or depleted, and some of them on the brink of collapse, or already collapsed.

Combating the unsustainable use of fisheries resources has become a priority of the African Union (AU)²⁰ and became the pivotal rationale for developing the African Blue Economy (BE)²¹. The overarching policy document is the African Union (AU) Agenda 2063: *The Africa We Want*²². Another significant policy is the AU-IBAR *Africa Blue Economy Strategy Implementation Plan, 2021-2025*, which puts the "Fisheries, aquaculture, conservation and sustainable aquatic ecosystems" as its first thematic area²³.

The emergence of the African BE was supported by the EU, expanding African-EU cooperation beyond the traditional focus on *inter alia* development, trade and security, rule of law, good governance, human rights and gender equality. The "Towards Comprehensive Strategy with Africa"²⁴, for example, highlights the need of promoting a better ocean governance, and has become an increasingly important part of EU-Africa political dialogue and actions. The strategy covers most of the EA-SA-IO region, which is made up, aside from Mauritius and Seychelles, of developing and least developed countries, and some economic-political fragile, failing or failed states.

¹⁶ Sustainable Fisheries to the Blue Economy of the Eastern Africa, Southern Africa and Indian Ocean region (EEOFISH programme) – Mid-Term Evaluation (FED/2018/039-977), SIEA-2018-9521

¹⁷ FAO, The State of World Fisheries and Aquaculture (SOFIA) 2022

¹⁸ idem

¹⁹ One notable exception is the trawl fishery of Lake Malawi/Niassa/Nyasa which is in decline, however.

²⁰ AUC-NEPAD (2014). The Policy Framework and Reform Strategy for Fisheries and Aquaculture in Africa, <http://repository.aubar.org/handle/123456789/1204>

²¹ The objective of the Africa Blue Economy Strategy, as of the BE strategy in general, is to guide the development of an inclusive and sustainable blue economy that becomes a significant contributor to continental transformation and growth, through advancing knowledge on marine and aquatic biotechnology, environmental sustainability, the growth of an Africa-wide shipping industry, the development of sea, river and lake transport, the management of fishing activities on these aquatic spaces, and the exploitation and beneficiation of deep sea mineral and other resources." AU-IBAR, 2020. Africa Blue Economy Strategy Implementation Plan, 2021-2025 <https://au.int/en/agenda2063/overview>

²² idem

²⁴ EC, Towards a comprehensive Strategy with Africa, Brussels, 9.3.2020

1.3. Methodology and approach of the MTE

Final findings, conclusions and recommendations are based, above all, on the toolbox for participatory appraisals, in particular Focus Group Discussions (FGD) and Key Informant Interviews (KII) with stakeholders both at institutional, competent authorities and grass root levels, and resource persons in the participating countries, virtually or face to face. In addition, documents provided to the MTE before the fielding of the mission, and during and after the field visits, were assessed.

The MTE team developed a structured interview format which was distributed, together with the Inception and Desk Report, to stakeholders listed e.g., in the Action Document and the ECOFISH Handbook. Feedback from the interview format, perusal of and relevant data and information gleaned from documents, and results from FGDs/ KIIs were all used formulating responses to the Evaluation Questions in Chapter 2, and Findings, and Lessons learned, Conclusions and Recommendations in Chapter 3.

1.4. Constraints and limitations of the MTE

The time allocated for MTE, overall and regarding, in particular, the travel schedule shown in the map below, was extremely limited in all respects considering the complexity of the Programme and its geographical and institutional coverage.

The MTE team also encountered considerable difficulties to arrange and organize meetings with implementing partners and partner institutions and stakeholders. This was mostly due to the inability, of the MTE team, to obtain comprehensive and concise coordinates of public or private partner institutions and responsible officials involved in the Programme’s work plans. This created obstacles which could only be overcome, partially, through frequent communication with the TAT, and by mobilizing personal professional networks and contacts.

Many of the focal points of the project could not be contacted, despite repeated requests and efforts by the MTE team and the TAT admin staff or were not available to meet due to diverse reasons. In some cases, the team could not fail to notice limited interest in the MTE and, possibly, in the Programme as such. For example, the MTE team could not meet the NFP in Madagascar, who was in another meeting; the entire senior management of the Seychelles CAs, who were, with one exception, travelling; and senior representatives of the Burundi CAs who were not available at all. Equally, efforts to identify the officer responsible for overseeing the LVFO, on the part of the EAC as the relevant DMRO/REC, failed.

The MTE team was not able to arrange a face-to-face meeting with the TL of the TAT, which would have been useful with regards overall administration of the Programme and, especially, the criterion “efficiency” of the OECD/DAC criteria. The absence of the TL throughout the MTE also limited the MTE, *inter alia* to get more detailed information on Programme delivery, and delays incurred due to the earlier controversial replacement of the “first generation” MCE and the C&V experts and regarding the still pending replacement of the regional fisheries management expert.

Figure 1 shows the countries visited by the MTE team; and the **Annex I “Aide Memoire” provides the complete list of stakeholders and their resource persons met in chronological order, as well as the list of countries visited by each Key Expert by date.**

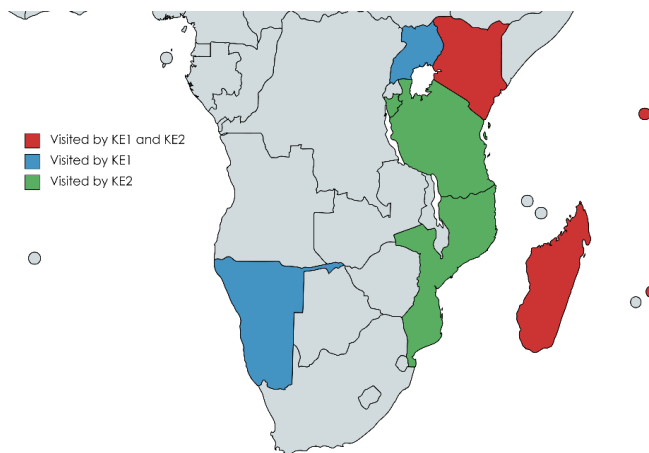


Figure 1: Countries Visited and Field Mission (28/09/2022 -> 27/10/2023)

2. Findings

2.1. Evaluation questions of the ToR

The original EQs were formulated on an indicative basis and included in the ToR of the MTE. Following the change of the MTE TL, the inception and desk report, which had been decided to be combined into one document, and which was very much embryonic at that state, was finalized with some urgency by the new MTE team in Europe, after a first virtual meeting with EUD and the ECOFISH TAT. Urgency was requested, warranted, and provided, in order not to delay the MTE, especially the field visits, further.

After arriving in Mauritius, consultations with the EUD Evaluation Manager, the EUD Attaché for Fisheries, the ECOFISH Programme TAT (excluding the TL) and the IOC Officer in Charge of the Programme were held. Of the Reference Group²⁵, only IGAD could be reached, virtually, at the time. Time pressure to commence the field visits (including ironing out of schedule and logistics) limited opportunities for assessing the inner functioning of the Programme and its interaction with IOC e.g., with regards to some EQs. The pressure came, partially, as a result of a change in the MTE composition after resignation of the original TL. Overall, the EQs formulated in the ToR were helpful for drafting the methodology and tools of the MTE e.g., the structured interview format. They would have been more helpful had they been structured in line with the OECD DAC criteria evaluated under chapter 4.2 Conclusions.

The following responses to the original EQs are, above all, based on FGDs and KIIs in the countries visited, and responses to the structured interview format. During the scarce time allowed by the tight schedule in the field and in Mauritius, the MTE perused additional documents provided by the TAT, unearthed during the visits, or provided by respondents and resource persons after the return of the MTE team to Europe.

EQ 1: To what extent has the Programme mainstreamed the principles of sustainable development or the Blue Economy paradigm in the target inland and marine fisheries of the region?

The MTE team commends Programme support for responsible fisheries management and MCS of inland and marine fisheries in the region, addressing *sustainable fisheries* in its hierarchy of objectives. It embraces the African Blue Economy (BE)²⁶ Strategy which was developed in the wake of the Sustainable African Blue Economy Conference that took place in Nairobi 2018²⁷, to guide sustainable development and the conservation of aquatic ecosystems²⁸, aligning with the UN Sustainable Development Goals (SDGs), above all SDG 14: Conserve and sustainably use the oceans, seas and marine resources for sustainable development.

Throughout its reporting, the MTE noted the efforts of the Programme to mainstream the principles of sustainable fisheries development in the EA-SA-IO region, advocating the three fundamentals of sustainable development *Economic Efficiency - Social Equity — Environmental Integrity while coping with the potential external factors such as climate change and marine pollution*²⁹.

The Programme does, however, not provide clear strategies how to achieve increased production, growth, wealth creation etc. postulated, implicitly and expressed in African BE policies, from largely depleted of coastal and inland water resources and degraded aquatic ecosystems, or from either fully exploited or overexploited straddling tuna and tuna like stocks.

The ambiguity of increased production (growth) and responsible fishing (limiting access to resources and safeguarding the aquatic environment) is highlighted in previous MTE reporting, as a global and

²⁵ The reference group is made up by the representatives of the EU Delegation, IOC, SADC, COMESA, IGAD and EAC.

²⁶ The term 'Blue Economy' was first introduced at the Rio + 20 Summit in 2012 by SIDS (Small Island Developing States). Since then, various international organisations have given their own definition of the 'Blue Economy'. These definitions vary widely, although the central concept is always strongly oriented towards economic aspects rather than sustainability. In particular that of the OECD which states: "The ocean economy can be defined as the sum of the economic activities of ocean industries and the resources, goods and services of marine ecosystems." <https://www.oecd.org/futures/Policy-Note-Ocean-Economy.pdf>

²⁷ The Africa Blue Economy Strategy was endorsed by the 3rd session of the Specialized Technical Committee on Agriculture, Rural Development, Water and Environment in October 2019.

²⁹ Soobaschand Sweenarain, ECOFISH Technical Handbook, November 2020. The workplan of the Handbook is largely, not entirely (result 3 is omitted) taken from the EC Action Document of 2018

idiosyncratic conundrum of fisheries management, of SSF and artisanal fisheries in marine and inland fisheries, and LS offshore fisheries alike.

With respect to extent has the Programme mainstreamed the principles of sustainable development or the Blue Economy paradigm, the MTE team would invite just consideration of the delays outlined in 1.1, above, and the limits of a project-based, time bound Programme. The latter sets limits to the pretension of the Programme of being a *multi-faceted and regionally stretched endeavour for enhancing the sustainable, inclusive and climate-smart management of shared marine and inland fisheries in the EA-SA-IO region*³⁰.

The MTE also suggests, after the field visits and discussions with DMROs, CAs and grant projects, that the plethora of strategic actions implied in the pretentious Programme design cannot be resolved effectively at macro (continental and/or regional) institutional and policy levels. The postulate of sustainable fisheries is already amply mainstreamed throughout the African institutional and policy making landscape, with or without external, donor driven assistance, but policies still retain growth and wealth creating goals while resources continue to decline. This does by no means imply, from the point of view of the MTE team, that the Programme cannot advocate the principles of sustainable fisheries development and, within its HR and logistic limits, act in an advisory role or as an honest broker within DMROs in case of disconcert between MS, and, regionally, among them. The Programme's contribution to coordinating and harmonizing regional efforts by DMROs, RFMOs, RFBs and other implementing partners e.g., AU-IBAR is noted, as was the disconnect, until recently, with IOTC which, with SIOFA³¹, are the only marine RFMO in the region. Further efforts of the Programme to rationalize overlaps of mandates and memberships among the DMROs would be advantageous to harmonize national and regional support to sustainable management of marine and inland fisheries and to mainstreaming the BE paradigm further.

The MTE therefore concludes that, ultimately, policies and assistance efforts must be lowered to local government, and community and fisher/value chain operators' and fish worker levels, facilitated by national legal and regulatory frameworks adequately supported by logistic/budgetary provisions. Here, appropriate external assistance, even if project based, limited in geographical and demographic coverage, and time bound, could be helpful to facilitate a tipping point from growth orientation to sustainable use, conservation and restoration of resources, and user and food security and nutrition focused strategies.

Therefore, the MTE team welcomes Programme support to the grass root SSF projects which directly relate to goals and targets of SDG 14, as well as to the Aichi targets formulated in the context of the UN Convention on Biological Diversity (CBD), both of which call for effective area-based conservation measures (see EQ 8 below), all in the context of SDG 1: No Poverty, and SDG 2: Zero Hunger.

EQ 2: To what extent are the established Management and Governance, including the administrative, financial and project management procedures, conducive to driving the intended interventions toward the expected results and long-term impacts?

The ECOFISH **management** integrates external Technical Expertise provided by the TAT and the in-house project management and operational functions as administration, finance, procurement, HR management etc. by the IOC Secretariat. Activities (subsumed under work plans) are implemented through direct, semi-direct and indirect management procedures by IOC and EUD Mauritius, with EUDs in beneficiary countries, DMROs and RFMOs as implementing partners. Also flagged are the *Integrative Regional Coordination Mechanism (RCM)*, the *Sub-Regional Coordination Mechanism (SRCM)* and the *National Coordination Mechanism (NCM)* which are linked to the existing institutional set-up of the EA-SA-IO region³².

Regarding the latter, the MTE noted the claim of the last 6-Month Interim Report³³, under cross-cutting activities (work plan 5), that *all management and governance mechanisms are functional*. The same

³⁰idem

³¹ SIOFA's mandate is to ensure the long-term conservation and sustainable use of demersal fishery resources including fish, molluscs, crustaceans and other sedentary species within the area of coverage of the agreement, and excludes highly migratory species, and sedentary species subject to the fishery jurisdiction of coastal States

³² According to the Technical Handbook op. cit., the RCM consists of a web-based digital platform that will also support key stakeholder group meetings and policy dialogues periodically. The TAT report of 31.12.2022 claimed that the RCM was advanced, the 30.07.2022 report mentioned it as part of the agenda of a workshop (12 to 19 June 2022) which also included the validation of a climate change study.

³³ 6-Month Interim Report of the INCATEMA TAT of 31.07.2022

report commented, however, that administrative, financial and project management procedures remain complex, and that they are *being addressed but not resolved*, and noted that *the IPMU, particularly at the IOC Secretariat, are underperforming*, and explained that, *apart from COVID-19 obstructing implementation of the Programme in various ways, other structural shortcomings have been observed that undermine their implementation capabilities*³⁴.

The MTE team found no similar criticism in the previous INCATEMA TAT report and could not gain in depth knowledge on why, over the last reporting period, the IPMU underperformed. This would have required a lengthy and comprehensive assessment including individual face to face interviews which the limited time available and the dense schedule of the MTE when in Mauritius didn't allow, as mentioned above. Only some aspects were recorded, e.g., it was noted that the regional IPMU Fisheries Management Expert did not renew his contract in June 2022 and no replacement had been recruited by IOC at the time of the MTE. The MTE also learned that the "first generation" of KEs for MCS and C&V was replaced but could not identify the rationale for such profound change in the TAT team selected through open bidding.

The **governance structure** of the Programme includes an Apex Regional Programme Steering Committee for the entirety programme and foresees Sub-Regional Steering Committee (SR-PSC) for each of the devolved Programme work plans, i.e., the LVFO, LTA and Marine Fisheries. Also, part of the governance structure are the Sub-Regional Technical Working Groups Working Groups which aspire fostering coordination of the ECOFISH activities with the DMRO involved in the Marine Fisheries i.e., COMESA³⁵, IGAD, IOC and SADC. According to the Technical Handbook, *these sub-regional forums will be led by the Fisheries Expert or Focal Point of the DMRO in collaboration with the Programme Technical Coordinator*³⁶.

The MTE team appreciates the intension voiced by the TAT to improve the IPMU efficiency in implementing work plans, with the caveat that improvements should not be limited to efficiency but to effectiveness as well. Examples for effectiveness have been commented on in EQ 11 regarding the C&V component, possible shortcomings regard the regular monitoring of the grant projects under Result 3. In this context, the MTE reiterates the problem encountered during the field visits mentioned in 1.4 with respect to contacting and meeting focal points and key reference persons. This could have been due to problems of coordination but could also hint at a limited degree of appreciation and "felt" relevance of the Programme.

The MTE team considers the management and governance structure as complex and complicated. To ensure their functioning challenges the HR capacities of TAT and implementing partners alike. Carrying out a mid-term evaluation, the team was not able to ultimately assess efficiency and effectiveness of meetings and workshops toward the expected results and long-term impacts of the Programme. The team noted the considerable space the structuring of these activities is given in the Technical Handbook³⁷ with respect to high level policy meetings, organized by the Programme or other organizations, and participated in by senior staff³⁸. The MTE re-quotes, in this context, the statement repeated several times in the same Handbook that *the African continent is not short of development policies and strategies but of adequate capacities to implement them*³⁹. This insight is, alas, not entirely reflected in the design of the Programme.

EQ 3: To what extent are the intended interventions of the operative work plans, LVFO, LTA, and the Marine Fisheries Work Plans (implemented by the IOC) aligned with the programme's expected results and objectives?

All operative work plans (LVFO, LTA, and the Marine Fisheries Work Plans) have potential to contribute to the objectives of the Programme, directly under Result 1 by supporting resource management, and indirectly under Result 2, by strengthening MCS and compliance with efforts to combat IUU fishing. The MTE assessment of efforts, achievements and problems encountered is outlined below.

³⁴ 6-Month Interim Report of the INCATEMA TAT of 31.07.2022

³⁵ According to information received by the MTE, COMESA has no in-house fisheries subject matter expertise.

³⁶ Technical Handbook, 3.6, op. cit

³⁷ ECOFISH Technical Handbook, op.cit.

³⁸ The MTE noted an abundance of missions by the TL of which many were undertaken outside the operational context of the Programme, different from missions carried out by the subject matter (MCS and C&V) experts.

³⁹ Attributed to a AfDB CEO

Work Plan 1: LVFO⁴⁰ Lake Victoria fisheries are managed through regionally by the riparian countries of Kenya, Uganda and Kenya. Management is coordinated by LVFO, a specialised institution of the East African Community (EAC). The ECOFISH support to the LVFO of an allocation of 2 million EUR is (“semi-indirectly”) managed by EUD Mauritius and the IOC Secretariat⁴¹. The organization’s Project Management Unit benefits from NKE support in the field of administration and accounting, assisting LVFO managing the allocated funds.

Achievements by the Programme and recorded over the last reporting periods by the TAT⁴² included subject matter advice regarding a lake wide frame survey, completing the validation of the 4th LVFO Fisheries Management Plan, and an interdisciplinary study and consultation about the transformation of LVFO into an East Africa Fisheries Organisation (EAFO)⁴³. Potential regional MCS operations had been previously facilitated by the Programme, training of MCS officials from all riparian countries. A capacity needs and gaps assessment regarding HR for MCS covering all riparian countries is in the pipeline, as is training in fisheries enforcement, compliance, and prosecution procedures of officials to dove-tail the assessment.

The MTE considers achievements as tangible but has some reservation regarding activities flagged, rather sweepingly, in the TAT report, i.e., *facilitating national high-level policy dialogues on IUU fishing and sensitisation of fisher communities and local leaders*⁴⁴. While ECOFISH capacities could suffice for *facilitating policy dialogues, raising awareness with fisher communities and local leaders* may be beyond the logistic and human resources of the Programme. Awareness raising with local leaders will require a *priori* sustained efforts of the CAs of the riparian countries and is, as prior examples have shown, beyond the scope and sustainability of time-bound TA projects.

Considering the respective track record of LVFO and LTA (for the LTA see below, Work Plan 2), the MTE team is neither convinced of the pertinence and value added of the transformation of the LVFO into an East Africa Fisheries Organisation (EAFO). MCS operations covering all of the lake are very much warranted but will require political will of the riparian countries. Any effort of the Programme to foster such political will would be beneficial to the state of the Lake. Programme assistance to CAs in identification, demarcation and marking of Tilapia breeding and nursery grounds would be equally beneficial, as would be supporting the follow-up lake-wide frame survey⁴⁵ and improving comprehensive MCS capacities. All the above give perspective to further Programme support to LVFO and the CAs of the riparian countries, all of which are part of the EA-SA-IO region.

On the base of discussions with resource persons and stakeholders, as well as feedback received on Annex 2 of the MTE Inception and Desk Report, the MTE team concludes, nevertheless, that the LV fisheries, in terms of resource management and of other internal and external threats (see preceding reports) remain in a critical state regarding sustainability of stocks. Effective access management is still on the “to do” list, and any Programme support to and facilitation of a management regime limiting access will be a valuable contribution.

Respondents agreed with the MTE that the best and maybe only approach to reduce fishing capacity and effort would be a buyout scheme, by decommissioning a large part of the present fleet and compensating fishers, ensuring their livelihoods by paying monthly stipends. However, the present problem facing this seemingly simple strategy is that most fishers are not bona fide fishers i.e., owners and operators of their vessels but fish workers, with most vessels being owned by outside financiers (as are the fish cages mentioned below). This would, probably, prevent buy out schemes to effectively reduce fishing pressure, because outside investors are motivated by generating a maximum of revenue in a minimum of time.

Comments of LVFO suggested the possibility of a more optimistic scenario i.e., to provide a right based management regime giving preferential access (permission to fish) to local fishers and restricting number of vessels owned by fisher (ideally 1:1) which could make buy-out schemes feasible. The MTE team considers mounting a pilot scheme along these lines as an option for Programme support, if agreed regionally and implemented in mutually agreed upon parts of LV.

⁴⁰ The IOC has entered an agreement delegating ECOFISH support to the LVFO. LVFO is part of the EAC but there is nobody in EAC delegated to oversee LVFO the MTE could identify.

⁴¹ Under a Power of Attorney attested agreement.

⁴² 6-Month Interim Reports of the INCATEMA TAT, op. cit.

⁴³ Idem “...following a recent directive of the EAC Council of Fisheries Ministers”.

⁴⁴ idem

⁴⁵ The first survey had advisory support from the Programme which contributed to its desired outcomes.

New external threats as plastic pollution, pollution from cage fish culture and sand mining negatively impacting tilapia breeding grounds are on the rise, and demand for fish maws (swim bladders) of Nile Perch exclude fish with removed maws from processing for export markets, which require intact fish according to hygiene and sanitary standards.

Highly alarming is the release of exotic and highly invasive Chinese silver carp into Ugandan water bodies connected to the LV, Nile, and, possibly to the Congo Basin. As discussed in the context of this MTE before, there is clear and present danger of this exotic species degrading the ecology of all the LV basin and, in a worst-case scenario, of adjacent large inland fisheries ecosystems by displacing endemic species⁴⁶. This would impact abundance and biodiversity and jeopardize the existential social, economic, and cultural services they provide⁴⁷.

Work Plan 2: LTA, has been allocated 2 million EUR with support to be implemented via a collaborative agreement between LTA and FAO, under the supervision of the EUD in Burundi, i.e., the LATAFIMA (Lake Tanganyika Fisheries Management) project, with the rationale of fostering sustainable management of the LT fisheries and the social and economic services this large aquatic ecosystem provides to an estimated 12 million. Of these about 10% are SS fishers, with women dominating the post-harvest sector.

The challenge of utilizing resources is formidable, to say the least, with the core problem being once more the open access regime of lake fisheries, resulting in overfishing and destructive fishing practices by predominantly SSF. Open access and the vastness of the lake surface of almost 32,000 km² rules out input controls, as limiting the number of vessels and gear: enforcing limits would be far beyond available HR, logistic and budgetary means⁴⁸. Output controls are complicated by a myriad of uncontrollable landing sites. To this, civil strife, insecurity, the presence of armed militia, the huge number of IDPs⁴⁹, the Covid 19 pandemic, outbreaks of Cholera and, recently, Ebola must be added. All affect governance in general including sector governance of fisheries, impacting negatively on fisheries value chains.

The LTA is pushing a Regional Fisheries Management Charter which was drafted based on three studies carried out by FAO on:

- The main commercial species and their breeding areas,
- The socio-economic relevance of and impact of fisheries on livelihoods, and
- Updating of MSC directives and strategies.

The Charter was validated by the four riparian countries; it entails, as a tentative conclusion, to safeguard stocks of the most commercially important species by completely closing fishing for three months in all the lake, but left questions regarding issues like acceptability, socioeconomic and food security impacts, and enforcement of compliance unanswered.

Up to the time of the MTE, implementation of LATAFIMA had produced only limited results, as the studies mentioned above. According to the ROM Report carried out during the summer 2022⁵⁰, and confirmed by implementing partners and stakeholders, observers and resource persons consulted during the MTE, the central problem is the lack of responsiveness and operational constraints imposed by FAO administrative procedures identified by FAO. As a result of FAO not responding efficiently, technical staff hired by FAO based at the LTA Secretariat is un- or underemployed and not paid, as stated by the Rom report: *six national supervisors responsible for the activities in each country have not been paid since the beginning of the project*. The EUD Burundi is considering a project suspension, freezing funds until the complete revision of the agreement and, possibly, a change of the TA provider, if this does not result in losing the funds⁵¹.

The ECOFISH TAT met LTA, FAO and EUD Burundi repeatedly, face to face and virtually, to assess the performance of the LATAFIMA. The Programme provided some TA support e.g., elaborating a protocol on fisheries management measures, guidelines for MCS⁵² but “refrains from interfering with the

⁴⁶ As witnesses in the Mississippi riverine ecosystem <https://link.springer.com/article/10.1007/s10530-019-02124-4>

⁴⁷ This was already reported to policy makers e.g., in the first IGAD Regional Strategy for Fisheries and Aquaculture for the coming five years (2016-2020).

⁴⁸ TAT stated that “the Recently, the riparian countries addressed the issues of fishing overcapacity through gear restrictions, which are not adequately enforced due to a lack of institutional, human and technical capacities.

⁴⁹ Internally displaced people

⁵⁰ A Innocenti, J Turini; ROM Report LATAFIMA, 22/09/2022

⁵¹ EUD Burundi, pers. comm.

⁵² INCATEMA The 6-Month Interim Reports 31.12.2021

triangular LTA-EUD-FAO contractual agreement to avoid further confusion or contradiction”⁵³. Nevertheless, during the MTE the LTA expressed hope for support from the TAT of the Programme beyond one- or two-day visits, with subject matter expert advisory inputs over longer periods⁵⁴, reversing its previous reluctance to interfere with the present “triangular agreement”.

The MTE team notes the “triangular LTA-EUD-FAO” LATAFIMA interagency cooperation arrangement is a major constraint for delivery of Programme support, preventing the facilitation of sustainable fisheries to the disadvantage, ultimately of fishers and fishing communities. If and when this constraint will be overcome, “advisory plus” support by the Programme would be very much warranted for accelerated delivery. To this end, the TAT, and facilitated by the respective EUDs, should pro-actively seek dialogue with the implementing parties.

Work plan 3: Marine Fisheries Work Plans are implemented by the IOC under Result 1 and 2, in collaboration with national CAs and relevant DMROs. The IOC PE for the work plans amounts to 9.75 million Euro, with the breakdown of 3,51 million Euro for Result 1, and 4,46 million Euro under Result 2. Additional budget provisions are for C&V, 0,15 million Euro, operating Costs 1, 12 million Euro, and contingencies 0,51 million Euro. The European Fisheries Control Agency EFCA has been supporting the IOC-PRSP in previous programmes and for ECOFISH a service contract for the collaboration of the IOC and EFCA is in development. The tender dossier that has been developed includes the ToR and detailed budget to be allocated to EFCA. The Dossier has been shared with the EUD Mauritius for comments and inputs, presently the process is in its final stages.⁵⁵ For regional MCS operations targeting LS industrial fisheries of tuna and tuna like fisheries it received an additional 2 million Euro from the European Regional Development Fund (ERDF) and INTEREG funding from La Reunion/France.

Its main asset for MCS is the IOC Regional Fisheries Surveillance Plan (IOC-PRSP) which is governed by a Regional Coordination Unit (RCU). Under Result 1, the IOC-RPSP includes three strategic actions i.e., (i) regional MCS operations led by IOC-PRSP, (ii) marine SSF, and (iii) cross-regional interventions. It was supported by the EU DG MARE from 2007 to 2014 and EU support was continued by the SmartFish Programme until 2018. Under Result 2, the IOC-RPSP encompasses, again, regional fisheries surveillance operations with focus on LS industrial fishing of straddling stocks and tuna and tuna like species, postulating strengthening MCS capacities in terms of detecting infringements of national legal provisions, and of regional resource conservation and management measures (CMM) e.g., CMM of the IOTC, and enforce compliance with them. Regarding (ii) marine SSF and (iii) cross-regional interventions, no impacts was noted/documentated except for the SSF projects allocated grants under result 3 and a virtual assessment of management/management plans which did not have any tangible results on grass root level.

The MTE team agrees with the need for MCS of the partner countries for management and sustainable use of marine fisheries resources in their EEZs, and for regional MCS including in ABNJ. In line with common perception of fisheries managers, the team considers MCS as the executive arm of fisheries management, for national or local specific management plans as for management and conservation of straddling stocks⁵⁶. With regards to regional MCS in the EA-SA-IO region, some resource persons and DMROs lamented the bias of MCS efforts under the Programme and the IOC-RPSP towards LS industrial tuna fisheries of island states⁵⁷. The MTE noted however that of the nine countries covered in the IOC-PRSP only four are SIDS, plus Madagascar, and four are coastal states. The latter are considered to have 20 % of tuna and tuna like stocks of the SWIO region, which would be a plausible argument for this bias. This bias would also be counteracted if the SADC command centre is established on the continental mainland, not in an island state.

Regarding Programme design, the MTE team had difficulties grasping the rationale of overlapping MCS functions of the same work plan under different results and noted lack of consistency between Result 1 and Result 2 of work plan 3, in the Technical Handbook and the TAT reporting. This makes understanding what actions were taken with what results, and what budget provisions were used for which of each individual strategic action, difficult.

⁵³ 6-Month Interim Reports of the INCATEMA TAT, op.cit.

⁵⁴ A request by EUD for STE MCS support was declined by the Programme citing lack of STE funds (EUD Burundi, pers. comm.)

⁵⁵ European Fisheries Control Agency EFCA <https://www.efca.europa.eu/en/content/objectives-and-strategy>

⁵⁶ With regards to regional MCS in the EA-SA-IO region, some resource persons and DMROs lamented the bias of MCS efforts under the Programme and the IOC-RPSP towards LS industrial tuna fisheries of island states, e.g., Motseki Hlatshwayo, SADC, pers. Comm.

⁵⁷ Motseki Hlatshwayo, SADC, pers. Comm.

Adding to the confusion is the claim of the Programme's Technical Handbook that the IOC-PRSP is the first Regional Plan of Action to combat, deter and eliminate illegal, unreported, and unregulated fishing (RPOA-IUU). The MTE team noted that, usually, RPOA-IUUs, the same as National Plans of Action (NPOA-IUU), are developed as standalone documents following the structure of the International Plans of Action (IPOA-IUU), a voluntary instrument developed in the aftermath of the FAO Code of Conduct for Responsible Fishing 1995⁵⁸.

The IOC-PRSP is considered the centrepiece of the regional marine fisheries work plan and the flagship EU supported effort to combat IUU fishing in the EA-SA-IO region, as described in the Technical Handbook⁵⁹ of the Programme. The MTE could not find physical evidence of the IOC-PRSP as regional MCS CC: The Project has no physical structure. Rather, it is a Programme dependent arrangement of Member States to facilitate MCS of national resource management frameworks and regional CMM. Donor dependence explains its lengthy dormant period following the completion of the SmartFish Programme, and raises questions about its sustainability beyond the Programme and/or other external financing.

Donor dependence will remain the Achilles' tendon of the IOC-PRSP, unless institutionalized with respective long term political and financial commitment by its Member States. To date, however, the often postulated "institutionalization" remains a postulate and limits performance and impact of MCS from within the institutional structures of the IOC and, possibly, the effectiveness of allocation and use of Programme funds to national MCS CAs.

Mention of a new attempt for the institutionalisation was made during discussions of the MTE team with the TAT and other implementing partners, with proposals to be made at the next 2023 Fisheries Ministerial Conference.

Another major remaining issue is the integration of the IOC-PRSP in the MASE⁶⁰ architecture and sharing of VMS data recommended by the IOC Secretariat. This was done without consultation with the PRSP, and the PRSP RCU representative disagreed with the proposition. The Seychelles expressed their opposition on the integration of the IOC-PRSP in the MASE in a respective position paper but agreed to sharing of information through an established tripartite MOU; however, Seychelles stopped sharing its VMS data in 2018, based on information received that the IOC Secretariat may have breached the MOU. It has been recommended, by the RCU, that an independent investigation be carried out and the MOU be improved. To date the IOC has not done so and Seychelles is still holding back its VMS data sharing until such time a report of the investigation is submitted, to legally permit and facilitate VMS data sharing⁶¹.

Following the elaboration of a road map for joined fisheries patrols, four such patrols took place, one end 2020, two during 2021 and the last one in March/February 2022. All patrols were carried out using the French patrol vessel Osiris, funded by INTEREG/La Reunion/France and had Programme TA support. The patrols had a total duration of 128 days, carried out 93 inspections "on board" and detected 25 infringements⁶². The C&V component of the Programme provided for news coverage and collaborated in a documentary on IUU fishing aired by Euro News. Another planned patrol, with the Madagascan patrol vessel Atsantsa, was cancelled because of the lack of funds from Mozambique, possibly attributable to the fact that the lease agreement between Mozambique and Madagascar for the use of the vessel was not finalised by time of the patrol⁶³. Two more joint patrols are planned for September/November 2022.

The MTE team acknowledges and commends the patrols as a main achievement of the marine fisheries work plans to date and considers the use of funds allocated by the Programme to national CAs under grant contracts for sea patrols and MCS capacity building instrumental for future joint patrols⁶⁴.

Another Programme achievement under result 2 lauded by the MTE is the assessment of MCS legislation. It involves enforcement, compliance and prosecution procedures and practices in member

⁵⁸ The IOC-PRSP entails elements of the IPOA but, in the view of the MTE team, is not a Regional Plan to prevent, deter and eliminate Illegal, Unreported and Unregulated fishing (RPOA-IUU)

⁵⁹ ECOFISH Technical Handbook, op. cit.

⁶⁰ The EU7 -funded MASE (Maritime Security) Programme, regrouping the regional communities (IGAD , EAC , COMESA, and the IOC, is a regionally owned Maritime Security Organization.

⁶¹ Jude Talma, ECOFISH MCS expert, pers. comm.

⁶² Jude Talma, op cit. Jude Talma, ECOFISH MCS expert, and Tiana Randiambola, IOC MCS expert, pers. comm.

⁶³ Mozambique did not participate in the PRSP RCU meetings that are responsible for the planning regional missions under PRSP.

⁶⁴ Considering that grants regional joint patrol (and national MCS efforts) have been disbursed to the competent authorities of Mauritius, Comoros, Madagascar, Seychelles, Kenya, Tanzania and Mozambique, the MTE could not determine why these grants were not used for the patrols.

countries, including efforts toward a regional observer programme⁶⁵. It also involves the subsequent elaboration of a model MCS for a legal framework which considers legal implications of the PSMA (Port States Measures Assessment) and, thereby, potentially support FAO/IOTC PSMA related efforts. Similar assessments on MCS capacity and MCS legislation were done for artisanal and semi-artisanal vessels targeting straddling marine resources, to support subsequent “action plans”, to be defined, and procurement of equipment (IT, inspection, safety at sea) were launched as part of capacity building. This is in line with previous MTE findings that building of scientific and cognitive capacity needs to be complemented by building HR and logistic capacities of CA’s and local level implementing partners.

The MTE team recorded the facilitation of the participation of member countries in regional meetings e.g., IOTC commission and compliance committee meetings (CoCs), which the team appreciates under the premisses of the inability of the benefitting countries to participate “under their own steam”.

The MTE team notes that, under Result 2, MCS is thematized in relation to *improve MCS of artisanal and semi-artisanal vessels targeting shared marine resource*⁶⁶, but not to SSF. In the marine fisheries plan under Result 1, SSF are mentioned generically, but, apart from results under result 3, no tangible effects attributable to Programme efforts were recorded). The MTE team stresses and reiterates below that the need for MCS applies equally to small scale and artisanal as to marine large scale (LS) industrial and semi-industrial fisheries but requires fundamentally different approaches. The team also remarks that, while illegal fishing of the latter appears to be on the down trend, it continues, unabated, in the former. Both are mostly unreported and unregulated, with some of the LS fisheries for tuna and tuna like species regulated *de jure*, via various licensing agreements but, according to resource persons and observers, not regulated *de facto*⁶⁷. Many observers in the IO and other regions consider un- and/or underreporting of catches⁶⁸ and not illegal and unregulated fishing the major constrains to managing access to the resource, possibly more so in overcrowded SSF.

EQ 4: Are the intervention design, preliminary research and consultative processes conducive to ensure effective collaboration, leadership and ownership among the target stakeholders and beneficiaries at various administrative and geographic levels?

The MTE commends the efforts made *inter alia* to accelerate implementation of the Programme by a strong IPMU, to improve the REC-RFMO relationships and linkages with agencies such as AU-IBAR⁶⁹ and NEPAD-AUDA, strengthening performance of national focal points (NFP) by confirming⁷⁰ and backing their mandates within their institution and improving their logistic capacities.⁷¹

The complex structure of the ECOFISH Programme, developed in the wake of similarly complex earlier Programmes (such as the SmartFish Programme), makes consultations on Programme structure and management difficult, further complicated by the huge number of implementing partners, which all have their specific agendas and extensive geographical coverage of the Programme. The -Month Interim Report' of 31st July 2022⁷² list *eighteen (18) island, coastal and landlocked countries of the EA-SA-IO region, five Duly Mandated Regional Organisations (COMESA, EAC, IGAD, IOC and SADC) and five (5) Regional Fisheries Bodies that include two (2) inland (LVFO and LTA) and 3 maritime (SWIOFC, IOTC and SIOFA)*".⁷³ In addition, non-beneficiary countries, such as La Reunion/France and South Africa, are also involved in the project.

Another element of complexity is due to the overlapping competencies of the different involved organisations (although the only ones with regulatory power are the IOTC and SIOFA, the latter with the limits of species and areas of coverage and species mentioned above) and the two inland water bodies, LVFA and LTA) and their member countries. Therefore, all decisions taken by the Programme's stakeholder institutions, and in particular the RFMOs, cannot disregard the opinion of any discussion

⁶⁵ By an observer working group working towards the establishment of a regional observer programme, Jude Talma, pers. com., op.cit.

⁶⁶ Technical Handbook op. cit. STA 2.2

⁶⁷ Citing invisible, by VMS, of many long liners (so called “blue boats” that are not detected by radar, not licenced, not registered with IOTC and largely involve in IUU fishing, J. Talma, pers. comm. op. cit.) .

⁶⁸ The main concern is the under reporting of catch mostly associated with the IOTC interim plan for rebuilding the Indian Ocean yellowfin tuna stock, idem

⁶⁹ E.g., through the EU funded Fisheries Governance Programme(s)

⁷⁰ According to the information of the MTE, EAC, which is one of the DMRO implementing partners and assigned responsibility over LVFO, has not delegated this responsibility within their Senior Management (source: pers. comm., anon.)

⁷¹ Ecofish Technical Handbook

⁷² Op.cit.

⁷³ It has to be highlighted that four RFB are RFMOs (LVFO, LTA, SIOFA IOTC) with a mandate to adopt conservation and enforcement measures ('resolutions') that are binding on its contracting parties while . SWIOFC are FMB only

with the Member States of those institutions that are not beneficiaries of the Programme. That happens also in case of specific Projects ⁷⁴.

The possibility of consulting such a large number of stakeholders during the preliminary phase is extremely challenging, if not impossible, also in view of the lack of funds and time available. It seems more feasible to lower the level of Programme interventions from the ambitious perch of high-level policy making to the levels of lessons learnt from previous Programmes⁷⁵ and needs to arrive at tangible benefits on the ground. As for work plans 1 and 2, for example, the EU has a long history of collaboration with both LVFO and LTA through the funding of a number of projects, which suggests that contiguous interactions have led to the formulation, albeit generic, of the specific projects.

The MTE Team acknowledges the complexity of these issues and challenges. The team has not been provided with evidence on consultative processes with and among implementing partners (DMROs) and other stakeholders. This finding is based on the consultation the MTE team had during the field visits and on in-depth research in the documents of the Project.

The Financing Agreement between the EC and the IOC describes the expected results, main activities and 'strategic actions', stating that specific activities will be defined together with the RFB and RFMOs based on their respective work plans for Outcome 1. Outcome 2 is about supporting the IOC-PRSP programme (direct grant-management) and indirectly an 'improved regional coordination mechanism' through the DMROs and directly with the national IUU CAs. Outcome 3 was developed as a 'call for proposals'. The document does not mention any previous discussion or consultation with DMRO/RECs and FMB and RFMOs for the formulation of the outcome and the programme itself, but this possibility cannot be excluded. Indeed, the MTE can assume that consultations took place. However, this assumption was confirmed, *expressis verbis*, only by AU-IBAR. In other cases there were conflicting statements. For example, during the meeting held with the IOTC officers, they stated that the IOTC was not consulted during the formulation of the Programme. ⁷⁶

As things stand, however, the MTE found, during the field mission, disconnections from the programme on the part of DMROs and other stakeholders, which suggests that the programmes initially developed were not fully adhered to. In the 6-month interim report of 31 July 2022⁷⁷ (Pag 17, § 2): "*the process of recruitment has encountered extreme delays, and to date, a contract has not been signed between IOC and the selected contractor since 24th of May 2022*"⁷⁸ delaying the development and/or strengthening of national fisheries MCS interagency cooperation in the EA-SA-IO countries.

EQ 5: How is the Programme performing in terms of leveraging effective collaboration and cooperation among the duly mandated economic and fisheries organisations to enhance the sustainable management of shared inland and marine fisheries resources in the EA-SA-IO region?

The MTE team has opined on the complexity of the institutional architecture of the Programme and pointed out some shortcomings, in some instances in concert with the TAT reporting, of coordination and communication which may well originate in some way from this complexity (see EQ 2 above). It is however important to consider the diversity and multitude of DMROs, other implementing partners and associated organizations, not to talk of International Development Assistance Organizations such as FAO, UNDP, UNIDO and UNEP which are involved in fisheries management *senso latu*. The Technical Handbook lists:

- Five DMROs i.e., COMESA, EAC, IGAD, SADC and IOC, of which the former two have no in-house fisheries expertise and a limited if not marginal stake in fisheries management, and the latter not

⁷⁴ The MTE team noted difficulties in situations where waters are shared with MS not participating in the Programme, as is the case on Lake Tanganyika (the DR of Congo is not part of the programme despite insisting on almost the entire left bank) and in the Kaza grant project in Namibia, which covers also Angola and Zambia that are not beneficiaries of the Programme.

⁷⁵ E.g. Smartfish Programmes, as repeatedly stated, even pointing out the differences, in the Handbook and in the six-monthly Reports of the ECOFISH Programme.

⁷⁶ See in IOC – EDF Contribution of Sustainable Fisheries to the Blue Economy of the Eastern Africa, Southern Africa and Indian Ocean region – EEOFISH Programme- GLOBAL BUDGETARY COMMITMENT No. RSO/FED/2018/039-977 INDIVIDUAL FINANCIAL/BUDGETARY COMMITMENT No. FED/ 2019/408-560" (Work Programme -Summary Pag.4) *The elaboration of this PE (WP 3) is the result of a consultative process with the five Duly Mandated Regional Organisations (DMROs) namely IOC, SADC, COMESA, EAC and IGAD and other relevant stakeholders.* (please note that IOTC is not cited)

⁷⁷ Op Cit

⁷⁸ From 6-month Interim Report (01/01/2022 to 30/06/2022) Page 17

being recognized as a Regional Economic Community (REC). Some of them have overlapping memberships and all of them answer *a priori* to their Member States (MS) which must not but can bias their role and function in regional fisheries management.

- Two inland Regional Fisheries Management Organisations (RFMOs), LVFO and LTA (see above), and the marine RFMOs, IOTC and SIOFA. The former two are direct beneficiaries of the Programme, in terms of budgetary, advisory and TA support. IOTC, although the only internationally and regionally acknowledged RFMO mandated with managing the economically most important marine resources of the ES-SA-IO region i.e., tuna and tuna like species, and other large migratory species, was not involved in the inception phase of the Programme and was *expresses verbis* excluded from Programme activities⁷⁹ in the 3rd Steering Committee of the Programme. At present, efforts are underway to revive and institutionalize dialogue and cooperation of IOTC with ECOFISH and IOC, also with regards to the implementation of the FAO PSMA. The geographical and species wise focus of SIOFA is only partially relevant for the Programme which has a *de forma* agreement of understanding with the Agreement.
- The Regional Fisheries Body (RFBs) i.e., SWIOFC is largely donor driven and is presently *de facto* only partly functional except for a socioeconomic sub-component according to resource persons⁸⁰.
- Other regional and international organizations mentioned above, with only AU-IBAR having been actively involved in the Programme inception, and the Programme participating in an AU-IBAR advisory council on African fisheries⁸¹. Future cooperation with UNEP is presently being discussed.
- The national CAs and law enforcement agencies involved in enforcing compliance of legal and regulatory provisions which are instrumental for fisheries management frameworks.

The MTE team commends the efforts of the Programme to contribute, as a *Cross-Regional Initiative* towards sustainable fisheries of the region, but reserves some doubts as to whether ECOFISH, as a donor dependent and time bound programme, and with regards to its financial envelopment, has the calibre of leveraging, not to talk of exerting effective collaboration and cooperation with and among political/economic entities as the DMROs, RFMOs, RFBs and national CAs.

Regarding regional DMROs and RFMOs, this opinion is derived from the fact that all of them have their own agendas which are determined by their accountability to member states, the interests of which are not always easy to harmonize either within the organizations or between them. There are plenty of lessons learned from donor driven and donor dependent development assistance efforts trying to exert leverage with and among countries and institutions or organizations. Leverage was rejected outright despite of the subsequent loss of funds, if the postulated changes collided with entrenched political agendas or the vested interests of external players and clients, or lip-serviced over the duration of the assistance without allowing for structural changes.

This does by no means imply that the Programme cannot provide support to and improve conditions for responsible fisheries, act in an advisory role, mitigate disputes or act as an honest broker within DMROs or, regionally, among them, in case of disconcert of strategies and policies.

EQ 6: To what extent, the proposed theory of change for unleashing the development potentials of sustainable fisheries as a growth sector for shared prosperity and transformative change in the marine sector feasible/realistic?

The MTE team has discussed the present planning framework, and hierarchy of objectives throughout its reporting, referring repeatedly to the conundrum of resource limits and growth postulates. With regards to the proposed *unleashing the development potentials of sustainable fisheries as a growth sector for shared prosperity and transformative change in the marine sector*⁸², the team notes the euphemism of the formulation which does not reflect the findings of the MTE team in the countries visited. Preceding reporting of the MTE team has documented respective findings, evidence, science and local knowledge based, of already overfished, severely depleted and partially collapsed stocks not only in these countries but in the region and globally (see e.g., the data cited from FAO's SOFIA 2018 and 2022).

⁷⁹ G. Domingue, F. Giroux, pers. comm.

⁸⁰ Pers. comm., anon.

⁸¹ M.B.D. Seisay, Obinna Anozie, Hellen Moepi, pers. comm.

⁸² The MTE team assumes that the omission of inland fisheries is not intended to exclude this important part of fish production in Africa but is an editing error. It is answering the EQ, therefore, as including inland and marine fisheries.

Findings are documented for in shore and inland fisheries fishing, the latter including in LV and LT (see EQ 3 above) and other large inland water bodies and for offshore fishing in national EEZs. Overexploitation is not restricted to demersal and pelagic stocks harvested by small scale and artisanal fisheries but include straddling stocks of tuna and tuna like resources. As remarked before, these stocks are, to some extent, managed *de jure* e.g., by licensing agreements and FPAs, but still are *de facto* only marginally or partly regulated, with MCS of limited access and compliance remaining a logistic and budgetary challenge the CAs of licensing countries are rarely able to surmount.

This results in continuing illegal fishing, which, if it is fishing without a permit or takes place in a prohibited area, is a crime infringement to be sanctioned punishable by law and can be prosecuted by the coastal state the regulations of which it is breaching⁸³. But, above all, the frequent and fraudulent practice of underreporting is considered the main obstacle to sustainable resource utilization, because it deprives fisheries managers of the data necessary to define science and evidence-based access regulations. This problem is exemplarily witnessed by the ongoing and, to date, largely fruitless efforts of IOTC to rebuild Yellowfin Tuna stocks, in coastal states EEZs and the high seas of the IO.

The MTE team believes that the Programme is well placed to use its voice to raise awareness, among its implementing partners, of the incompatibility of growth i.e., increased production and mortality, when living aquatic resources are overexploited or depleted, and that when habitats critical for stock survival reproduction and restoration are under multiple threats. Sustainable fisheries, as postulated in the Programme's specific objective, demand *a priori* protection and restoration of stocks, not increased and more efficient production i.e., less rather than more stock mortality.

The MTE team also believes that respective efforts by the programme would fall on fertile grounds, as policy makers have been and/or are increasingly becoming aware that open access remains *de facto* the overwhelming problem, together with ongoing if not increasing degradation of critical habitats, coastal development including unregulated tourism, pollution, especially plastic pollution and many more. Combating the unsustainable use of fisheries resources has become a priority of the African Union (AU) and the pivotal rationale for developing the African Blue Economy (BE). The MTE team sees the potential of the Programme of underpinning these processes by advocating conservation and combatting overcapacity and resulting IUU fishing, not the least because its well-developed C&V capacity.

To date, the core problems of *de facto* open access prevail in all fisheries visited, and, under present sector governance, and will impede any sustainable *unleashing* of fisheries for *wealth and shared prosperity*. It is suggested, therefore, to replace the euphemism of *unleashing* fisheries with the prerogative of maintaining ecosystem services by addressing, mitigating, and sometimes eliminating threats to stock abundance and diversity. The Programme has demonstrated its capacity to support conserving resources by limiting access and restoring critical habitats in some of the SSF "lab projects" which received ECOFISH grants under Result 3 (see EQ 8 below). However, the MTE team is also aware of the fact that magnitude and perseverance of the open access dilemma may well outlive the duration of the Programme.

EQ 7: How is the process of consolidating and institutionalising, including the prospects and challenges, the Regional MCS Coordination Centre, commonly known as the Regional Fisheries Surveillance Plan (PRSP), within the institutional ecosystem of the IOC advancing?

As the issue has already amply discussed under EQ 3, *marine fisheries work plans implemented by the IOC*, the MTE only reiterates a summary of findings below:

- The MTE could not document physical evidence of the IOC-PRSP as a multi-functional and cost-effective Regional MCS Coordination Centre within the IOC institutional landscape. The PRSP has no physical structure because it is a project dependent implementation arrangement which questions the sustainability of the programme beyond externally financed projects. Insufficient or lacking political and financial commitment by Governments of member countries are paramount constraint not only to develop and enforce MCS but to adequate fisheries management frameworks as such, with the latter being a pre-condition for MCS. Donor dependent and time bound projects or programmes cannot replace institutionalised long term political and financial commitment by Member States. Lacking this, to date, the "institutionalization" remains a postulate, limiting

⁸³ Jude Talma, pers. comm.

performance and impact of MCS from within the institutional structures of the IOC to the extent that external financing is available.

- A major remaining issue is the integration of the PRSP in the MASE⁸⁴ architecture, with sharing of VMS data recommended by the IOC Secretariat a possible obstacle. The integration of maritime security with fisheries surveillance was decided without consulting with the PRSP Regional Coordination Unit (RCU), and, reportedly, representative disagreed with the proposition, and the Seychelles expressed their opposition in a respective position paper⁸⁵.
- Although being the *flagship* of EU supported efforts to fight IUU fishing in the SWIO, the IOC-PRSP needs streamlining with other efforts in the EA-SA-IO region, be they in the pipeline (SADC) or envisaged (IGAD).
- Pertinence and relevance creating, in addition or parallel to the IOC-PRSP, other RFBs and MCS/VMS command centers needs to be evaluated:
 - In the context of the SADC Secretariat intend of operationalising a regional MCS Command Centre based in Maputo with the financial support of GIZ and WWF Africa is likely to become a reality soon⁸⁶. This mega MCS platform would integrate every segment of wild fisheries across its constituency which includes some MS of the IOC-RPSP, and
 - Regarding a *tailored Regional Fisheries Body within IGAD institutional architecture to cater for the sustainable development and management of the wild and farmed fisheries in the inland and marine sectors in its member states and including to provide a Regional MCS Coordination Centre (CC) for information sharing and strategic intelligence to combat IUU fishing in all its forms in the sub-region*⁸⁷.

With the proposed SADC and IGAD MCS CC, SWIOFC and an eventually institutionalized and physically established PRSP(as part of MASE or not) would amount to a total of five RFB in the EA-SA-IO region, to which the four RFMOs IOTC, SIOFA, LTA and LVFO must be added. The MTE team expresses considerable doubt with respect to the need for overcrowding an already densely populated institutional fisheries management and MCS landscape in the EA-SA-IO region, likely to continue depending on donor financing and sapping management capacities from the CAs of its member states.

EQ 8: To what extent the field projects of Result 3 – Call for Proposals for demonstrating the sustainable small-scale fisheries in the inland and marine sectors, including sharing of experiential learning, best practices and cultural communication, are contributing to the expected results and objectives of the Programme?

Following a Call for Proposals under Result 3, nine SSF projects were awarded grants under the Programme, to amounts of half to one million EUR. The projects, of which five are in the marine and the remaining four in the inland fisheries domain, were intended as complementary SSF management and governance initiatives, to facilitate replication at national and regional levels. They were considered pilot (lab) projects, to test the concept of sustainable fisheries at local, community and grass-root level, building on voluntary instruments as FAO's VGSSF and the EAFM. They can be, approximately, differentiated according to the approaches applied. For example:

- The SOS Sahel Sudan (a local NGO) implemented project to *improve economic resilience and food security of the artisan fishers in the northern Sudanese Red Sea Coast*, and the UNDP implemented *sustainable management of coastal fisheries in Mauritius and Rodrigues* project. Both have strong community focused institutional strengthening, and empowerment of women and youth components. However, although stressing the need for sustainable management of marine resources e.g., facilitated by training in marine biodiversity, there is also a strong focus on increased efficiency of fishing (improved gear and propulsion, FADs) and value chains, from handling of catches on board (e.g., in the SOS project using sea ice slurry for on board storage) to improved post-harvest infrastructure and fish processing (e.g., applying EU norms for fish processing in the UNDP

⁸⁴ The EU7 -funded MASE (Maritime Security) Programme, regrouping the regional communities (IGAD , EAC , COMESA, and the IOC, is a regionally owned Maritime Security Architecture.

⁸⁵ Jude Talma, pers. comm.

⁸⁶ Motseki Hlatshwayo, pers. comm.

⁸⁷ Technical Handbook, op. cit.

implemented project). In this respect, they resemble “classical” fisheries development assistance projects, with the UNDP implemented project encountering equally “classical” problems with the sustainable management of ice plants and cold storage and the SOS project requesting and receiving additional boats and engines without any data on abundance or depletion of stocks.

- The two transboundary river basin fisheries in the HOA region to *enhance sustainable utilization, development, and management* are implemented by IGAD. They are the Baro-Akobo-Sobat River Basin (shared by Ethiopia and South Sudan), and Lake Turkana Basin (shared between Ethiopia and Kenya). As the *Strengthening Community Fisheries in Kavango-Zambezi (KAZA) Conservation Area*, implemented by the Namibia Nature Foundation (NNF) Trust, these projects employ a co-management approach to manage transboundary riverine and lacustrine fisheries resources. Their success will depend on successfully and sustainably institutions, at producer and local authority levels. From IGAD reporting the MTE concludes that institutional strengthening facilitated by the projects led to functioning and participatory management committees, inviting close monitoring to gain “lessons learned”.

The KAZA project is successfully supporting community fisheries management arrangements supported by local traditional and state authorities. Efforts succeeded in the adoption, by communities, of sustainable fisheries practices in their conservancy areas. Problems encountered by the project relate mainly to the asymmetry of compliance with management measures, as the prohibition of destructive gear (monofilament gill nets), where successes on the Namibian side are in jeopardy of being cancelled out by non-compliance on the Angolan side⁸⁸ of the Kavango River⁸⁹. Similar problems were noted, by the NNF, on the Zambian side because of weak NGO support and strong vested interest from commercial, externally financed fishing ventures employing local fishers as wage labour.

- A similar approach, but without the transboundary dimension, is followed by the *Enhancement of social, economic, and environmentally sustainable management of small-scale fisheries* project in Zambia, implemented by Action-Aid Zambia, and the *Promotion of sustainable small-scale fisheries in Cahora-Bassa and Mogoe Districts, Tete Province, Mozambique*, implemented by the local NGO ADPP (Ajuda de Desenvolvimento de Povo Para Povo).

The former supports Community Fisheries Committees in seven districts, training and capacitating fisheries community leaders (under the assumption of downward cascading impacts) and Government extension workers. Foci are on stock enhancement and improving post-harvest value addition e.g., by facilitating cross border trade. The project strongly supports empowering of women and youth, advocates sustainable management of fisheries resources, including security of tenure, and follows respective national and regional policy and legal frameworks.

The latter employed an integrated community development approach, with community-based organizations (Fishermen’s Clubs) supported by efforts building their capacity for applying sustainable fishing practices, and by technical support to processing and running sales centres. The MTE commends capacity building including training in functional numeracy, literacy, and basic business skills, but also in climate-resilient subsistence farming. Members of Community Fisheries Council received training in community-based natural resources management and environment conservation, and funding for drilling of drinking water bore-holes and ecological latrines, parallel with an ongoing hygiene awareness campaign.

- The *Small-scale fisheries for sustainable Blue Growth improving food security and livelihoods in Coastal Kenya and East Africa* (KECOFISH), implemented by WWF Kenya, also employs a CBFM *cum* co-management approach to foster sustainable fisheries in the Shimoni-Vanga and Lamu seascapes. The project is adhering to WWF policies encompassing human rights, gender equality and inclusion, as well as environmental sustainability. The project supports *inter alia* community development by fostering village savings and loan associations (VSLA), and community-led resource management by beach management units (BMU) (in joined fisheries management areas (JCMA)). Management efforts include low-cost mobile fisheries data collection by fishers to support

⁸⁸ The NGO implementing partner apparently, lost all funding from the previous donor, The Nature Conservation, B. Hackenberg, pers. comm.

⁸⁹ The project complained about the lack of efforts to bring riparian countries on board on the side of SADC, which, according to the ECOFISH handbook, pledges support to cross boundary inland fisheries

evidence-based resource management. Training efforts were extended to local Kenya Fisheries Service staff⁹⁰ and activities are carried out in collaboration with local (county) government.

- The remaining two grant projects, the *Promoting equitable governance of tenure (including women and youth) in small-scale fishing communities in Zanzibar and in Tanzanian coast through extending successful pilot initiatives*, and the *Sustainable management of small-scale coastal fisheries in Northern Madagascar* project are implemented by two local NGOs i.e., the Mwambao Coastal Community Network Tanzania, and C3 (Community Centred Conservation) Madagascar, respectively. They build on previous support from SmartFish and on lessons learned over more than a decade.

Both projects work in liaison with national and local CAs but employ a basically CBM based approach. They focus on marine conservation and restoration, by fostering community led spatial and temporal access restrictions. In Madagascar, the overall objective was the improved management of locally managed marine protected areas (LMMAs), with the protection of endangered species in the foreground. The project trains fishers in basic marine ecology and the importance of fisheries management, facilitates landing sites surveys and data collection (with women dominating in some survey teams), recruits youth as *Junior Ecoguards*⁹¹ and reaches out to schools by providing pedagogic materials thematizing marine ecology and conservation education⁹². The project has signed a MoU with the Ministry of Fisheries and Blue Economy.

In Tanzania, the original initiative was to restore octopus' stocks by introducing three monthly no-take periods. The intervention not only succeeded in restoring and raising catch per unit of effort (CPU) of the species during open seasons but also contributed to restoring and conserving coral reefs. This spill-over effect attracted more tourists for diving and snorkelling and created supplementary income from charging access fees from tourists. Collection of fees is done by women of participating communities which receive part of the fees collected as remuneration of their efforts, with the remaining money going to the communities.

The MTE considers all projects fostering protecting, restoring, and conserving resources and habitats coherent with Programme objectives, adding considerable value to the balance of Programme achievements. In terms of effectiveness, they compare favourably with Programme support to LTA and LVFO with respect to sustainably using fisheries resources and protecting aquatic ecosystems. Some of these findings are based on anecdotal evidence rather than on comprehensive catch and effort monitoring, which is, however, already part of projects, in the pipeline, or planned. The KECOFISH project, for example, is expecting comprehensive result of its data collection activities by the end of the year and is planning a consultative data analysis workshop.

To date, monitoring of the grant projects by the Programme has been patchy, also but not only because of the Pandemic. The MTE noted the mention, in the 6-monthly TAT report, that *the TL will intensify the technical monitoring coupled with regular field visits to ensure that these projects have understood the modus operandi and scope of Result 3*⁹³. Here, the team suggests that the TL would be better placed coordinating the multidisciplinary team implementing the Programme rather than to do technical monitoring of these and possible future SSF grant projects himself, by occasional "parachuting" in. Instead, the MTE team proposes building perennial monitoring, backstopping, and reporting structures, using the NKE and STE resources still available, in concert with institution and capacity building support at local and community levels and backstopped by the TL/TAT, EUD Mauritius and National/DMRO Focal Points.

The MTE team agrees with the TAT that *sharing of experiences, learning, exchanging empirical knowledge and best practices and self-help capacity* is important. However, building yet another regional platform as presently foreseen may not be the best solution to serve this purpose: to service such platform would reduce the already limited HR capacity and time available to the few "boots on the ground" for much needed grass root level work. Instead, a yearly or half yearly regional meeting over sufficient time to exchange experiences and lessons learned "face to face" appears preferable. Beyond

⁹⁰ The project found itself in competition for KFS staff participation with the ongoing World Bank project "Kenya Marine Fisheries Socio-economic Development (KEMFSED)", indicating a problem with donor coordination frequently observed in the development assistance landscape.

⁹¹ FED/2020/415-574, Interim Narrative Report, 6.22

⁹² Development of alternative livelihoods to fishing and developing alternative food sources, which was reported by SmartFish, was not mentioned in the documents consulted and during the virtual meeting with expat technical experts.

⁹³ TAT/INCATEMA 6-Month Interim Report 31.7.22, op.cit.

that, increasing focus, on the pilot (lab) projects, of the C&V component of the Programme would be helpful to raise project profiles and to increase chances of multiplication i.e., Programme impact.

Regarding the relevance of Result 3 in the overall context of the Programme, the MTE team supports a in depth *ex post* assessment of all grant projects, their institutional and governance context, and the state of the resources and ecosystems in which they work. This assessment could be the basis for an *ex ante* evaluation of the future, possibly extended engagement of the Programme in SSF projects which put sustainable resource use, recovery of stocks, protection of aquatic ecosystem and critical habitats, their restoration first.

The MTE team emphasises, in this context, that stakeholders will only commit to fishing responsibly if stock recovery allows for sustainably higher financial returns. Without recovery of stocks by protecting and restoration of the habitats they depend on, the only result of enforcing legal and regulatory frameworks e.g., by enhanced MCS, is more poverty.

EQ 9: To what extent strategic tools anticipated by the Marine Fisheries Work Plans, such as the Blue Economy Fisheries Satellite Account, the Regional Fisheries Climate Observatory, can contribute to informed policymaking and management decisions.

BESFA is derived from the concept of Ocean Accounts that describes the Blue Economy in terms of a *statistical system that improves existing data with a view to developing ocean accounts which provides an understanding of the importance of the ocean as a development space*.⁹⁴

The MTE team recognizes that an account like the BESFA could be an important instrument for fisheries management. The team however also recognizes that this instrument can be developed only if there are sufficient and reliable data available and accessible.

Unfortunately, this is not the case for most Programme member countries and fishery sub-sectors. Relatively reliable data exists for some offshore and high-sea fishing, as IOTC data for tuna and tuna-like species, but there are incomplete data for some and almost no reliable statistics for artisanal fishing, both coastal inshore SSF and artisanal fisheries, and in inland fisheries. Causes are the open access regimes governing these fisheries, and the limited logistic capacities and HR available to monitor data as number of fishermen, number and size of boats and gear, propulsion which define fishing capacity, and data on catches, species composition and age classes, and historical records.

The 'Technical Paper Ocean Account'⁹⁵ commissioned by the Programme suggests extracting data from existing international data bases (DBs), such as those from the IOTC or FAO. Nonetheless, and to arrive at reliable data, IOTC and FAO cross-references data from multiple sources, as reports of observers and trade data, for countries that are subject to international trade agreements which oblige vessels to market their catches in controlled ports, e.g., EU fishing fleets. DWR fleets and fleets that land their catches with no *de facto* control, and market or process landings domestically make data available at their discretion (even if they are IOTC members), in particular on high value species like tuna. FAO, which is responsible for the worldwide collection, validation and dissemination of data and information related to fisheries and aquaculture⁹⁶, sources data from national fishery administrations⁹⁷. If national statistical data are not reliable, the resulting FAO data, even if corrected through statistical tools like Artfish and Open Artfish⁹⁸, are not reliable either.

Therefore, the unavailability of data identified by the BEFSA document of ECOFISH in countries to which the BESFA should be applied is a problem for which there are neither simple nor immediate solutions, not only regarding fisheries, but also for other sectors of the BE where no records of output/revenue exist⁹⁹

The MTE therefore concludes that although the BEFSA has the potential to be a useful tool for the monitoring of fisheries and aquatic ecosystems, it will, in the short term, would be of limited use for industrial fisheries but of little if any practical use for the management of SS and artisanal fishing in

⁹⁴ A. Sookun - Blue Economy Fisheries Satellite Account (BEFSA), Technical Paper Ocean Accounts, ECOFISH 2020

⁹⁵ A. Sookun - Blue Economy Fisheries Satellite Account (BEFSA), Technical Paper Ocean Accounts, ECOFISH 2020

⁹⁶ <https://www.fao.org/fishery/en/statistics>

⁹⁷ FAO collects relevant national statistical information on a regular basis through a questionnaire sent to and filled up by national administrations.

⁹⁸ <https://www.fao.org/fishery/en/topic/16081>

⁹⁹ A. Sookun op. cit.

coastal and inland waters. Overall, the structure, available funds and timeframe of the Programme do not allow anything more than a start-up actions to lay the foundations for these tools. This conclusion is expressed in the Technical Paper Ocean Accounts cited above which states, optimistically, that: *The BEFSA development will necessitate a participatory approach whereby pilot countries, and if possible, others, have to be brought on board, and Towards the end of the project, and even afterwards, the pilot and if possible, other member countries will be provided with any requested technical support for the publication of improved fisheries economic indicators.*

Regarding the setting up of a Regional Coastal Marine Fisheries-Climate Observatory, the MTE team would like to point out the existence of globally, regionally and nationally mandated specialized institutions and academia (including EU financed satellite-based programmes) which are monitoring medium- and long-term climate change (CC) effects e.g., coral bleaching, acidification etc., including in the coastal areas of the WIO region, for example a GIS-based coastal monitoring and surveillance observatory in Mayotte¹⁰⁰. Respective data are readily available from these sources¹⁰¹; to create another mechanism to observe CC induced threats in coastal marine areas appears, therefore, superfluous especially if launched by a donor dependent and time bound project or programme as ECOFISH. Instead, CC impacts at global and regional levels should be factored in where relevant for Programme actions and activities and work programmes but, beyond that, considered a *force majeure* beyond its influence as, for example, population growth.

Regarding extreme weather threats, national and local monitoring and early warning and watch mechanisms are already providing respective services. However, weather monitoring mechanisms and services become relevant only when warnings are made available/accessible to the fishers potentially endangered by extreme weather threats. The need for improving access to monitoring and forecasts of CC induced threats are more pertinent for coastal and inland SSF than for LSF, which have, usually, access to weather forecasts and warnings via radio and radar. For coastal inshore fisheries the MTE suggests improving coastal fisher's access to local weather forecasts, early warnings and alarms via handheld mobile applications as cell phones. If equipped with GIS based tracking devices providing geolocation, this would also improve safety at sea and facilitate rescue operations. Providing devices like smartphones to SS fishers would also enable and facilitate catch and effort monitoring.

EQ 10: What can be the short and long-term impact of the COVID 19 pandemic on the programme implementation procedures and expected outcomes, including remedies and adaptive solutions?

The MTE team noted the comprehensive and informed discourse on the actual and potential impact of the Covid 19 pandemic worldwide, in Africa and in the EA-SA-IO marine fisheries sector, marine and inland alike, in the ECOFISH Technical Handbook. Elaborations on delays incurred during Programme implementation due to the pandemic included e.g., limitations of effective communication imposed on the Programme, as working from home, teleworking and videoconferencing, recruitment of staff and operationalization of the programme in general, spanning from the establishment of the Integrated Programme Management Unit (IPMU), to mobilizing patrol missions under the IOC-PRSP because of restriction of travelling of inspectors and physical distancing on board.

While acknowledging the elaborations on the delays, the MTE team does not believe that the pandemic has added in any significant way to the structural and logistic challenges of the complicated architecture of the Programme, imbedded in an equally complex, multi-layered institutional landscape commented upon above, with partly overlapping constituencies and mandates.

The team also doubts parallels of change of consumption patterns which had resulted from the “mad cow” disease outbreak in Europe with similar impacts on consumer attitudes towards the consumption of sea food due to the pandemic. There is no evidence of such change and indications, as highlighted in previous reporting of the MTE based on FAO SOFIA¹⁰², i.e., that the average annual growth rate of

¹⁰⁰ <https://www.jstor.org/stable/24760705>

¹⁰¹ E.g., The Maïdo Observatory in La Réunion, <https://hal-insu.archives-ouvertes.fr/insu-01183159>, BCSS Ocean Observatory, <https://bcssmz.org/cop26-climate-change-the-west-indian-ocean/>, SCO Space for Climate Observatory (in IO), <https://www.spaceclimateobservatory.org/sco-pacific-indian-oceans>, Coastal observatory for climate, CO2 and acidification for the global South society (COCAS), <https://oceanecade.org/actions/coastal-observatory-for-climate-co2-and-acidification-for-the-global-south-society-cocas/>, Indian Ocean Acoustic Observatory – IUEM, <https://www-iuem.univ-brest.fr/lgo/les-chantiers/ohasisbio/?lang=en>,

¹⁰² The State of Fisheries and Aquaculture

fish eaten for food is already almost twice the annual growth rate of the world's population, and that demand is ever increasing. In this respect, the often and not always plausibly postulated “circular economy from hook to fork” may well stop short.

On the other hand, the MTE appreciates the Programme addressing and raising awareness of the challenges the pandemic and potential emergence of new variants of Covid 19, as well as of new threats as monkeypox, and continuing threats as HIV and Ebola (see EQ 3 above). Addressing these challenges are particularly relevant at “beach levels”, where awareness of these hazards is low throughout the value chain, from catch (including on crowded vessels of some sections of the DWF fleets) to retail, and where vulnerability is exacerbated by limited access to health care. It may be less relevant at high level policy making and institutional levels, where awareness of health hazards should/could be assumed and where actors usually have ready access to medical assistance.

EQ 11: To what extent are the Communication, Visibility, and capacity-building (crosscutting and overarching components) contributing towards the expected results of the Programme?

The MTE team commends the efforts of the Programme to improve communication and visibility (C&V) less as a cross-cutting theme¹⁰³, but as an essential component to *support the strategic actions of Result 1 and 2 as well as the awarded projects under Result 3*¹⁰⁴.

It benefitted from the previous experience and good practices identified during the SmartFish programme and responds to the ECOFISH communication & visibility objective *Facilitate information exchange, raise public awareness and advocate on the importance of sustainable management and development of fisheries for poverty alleviation, food and nutrition security, while addressing climate change and enhancing marine biodiversity*¹⁰⁵. Overall, the team concluded that the claim of the last TAT report that *the Communication and Visibility Strategy (is) fully operational is justified*¹⁰⁶.

As target groups the C&V strategy lists decision and policy makers, development partners, non-state actors including private sector, media, academia, and research institutes, CSOs, NGOs, CBOs, fishing communities and VC actors. The strategy already significantly increased visibility and branding of the Programme as recorded by the TAT report and evidenced on the Programme’s website showing that “ECOFISH” was associated with the keyword “sustainable fishing Africa” ranked first in the region and 16th worldwide¹⁰⁷.

The MTE team recognizes the priority interest of the donor to provide the Programme with appropriate branding and showcasing its profile, also vis-à-vis development partners e.g., as a steward of regional EU financed efforts to combat IUU of LS industrial fisheries for straddling stocks. The C&V component supported regional MCS by publicising the results of the first regional sea patrol under the Programme and is expected to continue supporting regional and national MCS i.e., by “naming and blaming” vessels caught fishing illegally e.g., by sea patrols, and by facilitating broad media coverage making outcomes of trials and administered sanctions to be accessible in the public domain. This would reinforce the deterrent effect of such patrols and may induce donors and governments to provide finance for such patrols.

C&V could become of central importance for supporting awareness of and buy-ins of communities in SSF projects advocating sustainable resource use, and could improve the impact of the Programme by encouraging replication of successful results. Grass root C&V will need less web-based efforts but communication, horizontally, by local facilitators and communicators, in the local language and using media accessible to fishers, their households and communities. Results of successfully deploying such strategies would be e.g., if communicants would actively participate in promoting and raising awareness on sustainable fishing issues in adjacent communities and in the region.

¹⁰³ TAT/INCATEMA 6-Month Interim Report 31,7.22, op.cit., Work Plan 5 – TA Contract and other cross-cutting elements.

¹⁰⁴ TAT/INCATEMA 6-Month Interim Report 31,7.22, op.cit., Work Plan 5 – TA Contract and other cross-cutting elements.

¹⁰⁵ Communication and Visibility Strategy for ECOFISH, Period 2020-2024, Ebène, Mauritius

¹⁰⁶ TAT/INCATEMA 6-Month Interim Report 31,7.22, op.cit.

¹⁰⁷ TAT/INCATEMA 6-Month Interim Report 31,7.22, op.cit.

EQ 12: Does the programme sufficiently addresses cross-cutting issues such as climate change, gender equality, youth etc?

The MTE considers that ECOFISH, maybe less by design but by practice, has addressed the mentioned cross-cutting issues (climate change, gender equality, youth, etc) adequately, on the base of documents perused, consultations with implementing partners, and FGDs and KII (Key Informant Interviews) in the field.

Regarding gender equity, the Technical Handbook¹⁰⁸ mentioned gender and gender equity a few times, in reference to macro level policies and universal voluntary instruments as the SSF, or *inter alia*, together with “contribution to livelihoods, food and nutrition security, gender equality and cultural diversity in the coastal communities”¹⁰⁹. No reference to youth was found and, as usual, the special vulnerability of the elderly was, presumably, subsumed under “etc.”.

The MTE sees no design deficit in ECOFISH appreciating gender equity *inter alia*, probably because the designers are very familiar with gender aspects in African fisheries and, therefore, avoided to add yet another facet to the Programme. This assessment is supported by evidence-based findings, such as:

- The fact that women, especially in Africa, have played and will continue to play a major role in SS and artisanal coastal and inland fisheries – unlike in LSF, where their role is usually reduced to that of (often migrant) wage labour in the processing industry. Roles vary regionally and even locally, with respect to the range of activities women are participating in the fisheries value chains, from fishing on foot (gleaning) in shallow waters to being processors, retailers, wholesalers, or financiers. Regionally and locally roles vary equally, with much of the West African marine artisanal fisheries being practically “owned” by women, to embryonic marketing chains in the HOA region, e.g., in Somaliland, where women are, nevertheless, the drivers of increased consumption of marine landings in urban centers, and
- The paramount roles women play in CBFM, EAFM and co-management as reported from many of the grant projects implemented under Result 3. Here, women play an indispensable role in building the grass root level institutions which are the *conditio sine qua non* for bottom up or co-management, sustainable resource use and protection/restoration of critical habitats and/or rebuilding of stocks, as shown in the recovery of octopus stocks in the Mwambo Coastal Community Network in Tanzania.

Competition of gender equality with thematic areas such as food security, poverty alleviation and IUU fishing etc. for funding was noted by some resource persons consulted e.g., in Kenya.

The MTE also considers that gender equality, together with poverty reduction and the social safety net SSF provides a “last resort” economic activity, are often used as proxies for the socioeconomic significance of coastal and inland SS and artisanal fisheries *ipso facto*. The acknowledgement of these valuable contributions to the common good should be complemented with the understanding that, under the condition of sustainability of resources use, SSF and post-harvest value added are potential driver of local economies via e.g., the accumulation of start-up capital and diversification of economic reproduction.

2.2. Additional evaluation questions of the MTE team

The MTE team takes advantage of the opportunity provided in the ToR to formulate additional EQs. There are other questions which would merit a closer look but for the time and other limitations of the mission mentioned in 1.4 above this was not possible; other questions, as the cooperation and the level of ownership, involvement and engagement of the of the different stakeholders and institutions involved in the Programme, are addressed, implicitly and explicitly, in the responses to the original EQs above.

The first additional question regards plastic pollution, an issue which is being increasingly regarded a major threat to aquatic ecosystems, inland and marine, and which was discussed in the previous reporting of the MTE. The second question added regards Result 2 of the Programme directly, and aspects of Result 1 and 3, and addresses IUU fishing *expressive verbis*, as postulated e.g., by DG

¹⁰⁸ ECOFISH Technical handbook, op.cit

¹⁰⁹ Idem, also proposing “actions would strengthen the role of women in the fisheries management process through capacity development and empowerment in line with the EU Gender Action Plan 2016-2020”.

MARE noted as absent in the evaluation questions of the MTE ToR and addressed in comments on the previous reporting of the MTE.

EQ13: Is the Programme adequately addressing the rising problem of plastic pollution which is affecting marine and inland fisheries alike?

The MTE team added this question because the keyword pollution was mentioned in the Technical Handbook only once (in the context of the intention of collaborating with UNEP regarding anthropogenic sources of pollution) and not at all in the last TAT report¹¹⁰. Plastic pollution wasn't mentioned in either document. This comment of the MTE team considers that, at the time of formulating the Programme, the issue of plastic pollution of marine and inland waters, although increasingly evident and flagged as a challenge and threat by environmental watchdog organisations, was not as much in the limelight as it is now, as underlined e.g., in previous reporting of the MTE, referring *inter alia* to data from IUCN.

It is rather intended to encourage the Programme to give adequate space to the issue pollution of inshore and offshore waters and the ocean space overall, when adjusting and reorienting the workplans for the remainder and possible extension of the Programme. This would be fully in line with the programmatic postulate of the EC DG Environment, Oceans and Fisheries: *Promoting plastic-free oceans and proper implementation of legislation on plastics, particularly microplastics*¹¹¹.

EQ 14: What are the results/perspectives of the Programme regarding contributing to prevent, deter and eliminate IUU fishing¹¹² in the EA-SA-IO region?

With respect to Result 2 and preventing, deterring, and eliminating IUU fishing in the EA-SA-IO region, the MTE team reiterates the core problem of IUU fishing, i.e., overcapacities and the *de facto* open access which remain the overwhelming constraint to sustainable and responsible fishing, for small scale and artisanal marine and inland fisheries, as well as for offshore marine fishing under and beyond national jurisdiction.

For the inland and the marine inshore and offshore fisheries, CBFM and co-management schemes have shown promising results, some of them supported by the Programme under result 3 (see EQ 8 above). Further Programme support to SSF grass root level institutions for CBFM and partnering CAs in co-management by strengthening communities and assisting them and CAs in developing adaptive management plans complemented by MCS are a clear and present opportunity and perspective of the Programme to combat IUU fishing in inshore and offshore fishing grounds within national EEZs crucial for livelihoods, food security and nutrition and local economies in the region.

MCS of CBFM and co-management are most effective if both community-based and supported by national and local CAs, because they foster ownership and commitment to responsible fishing on the side of communities and support of responsible fishing via conducive management frameworks of CAs, the latter being based on adequate legal and regulatory provisions. An important lesson learned from SmartFish is that responsible fishing and combatting IUU fishing does not start with MCS but ends in MCS, arguing that *stakeholders will only be able to fully commit to fishing legally if stock recovery and higher financial returns are a result of enhanced MCS*¹¹³.

The MTE team agrees with the author, reiterating that in fisheries where stocks are depleted and aquatic ecosystems are deteriorating, restoration of habitats and, thereby, recovery of stocks by access management need to precede increased effort and improved efficiency of fishing. Effective MCS will be supported by communities only if stocks have recovered to levels where they are providing better catches and tangible benefits to their members and alleviating poverty: *In the absence of stock recovery, the only tangible result of an enhanced MCS regime is more poverty*¹¹⁴.

Contrary to coastal and SSF, the MTE noted some ambiguity of assessments recorded with respect to LS industrial and semi-industrial fisheries: some considered IUU LSF for tuna, tuna-like and other large migratory species in the WIO following is a downward trend; others maintained that it continued,

¹¹⁰ TAT/INCATEMA 6-Month Interim Report 31,7.22, op.cit.

¹¹¹ https://ec.europa.eu/commission/commissioners/2019-2024/sinkevicius_en

¹¹² As postulated under "Responsibilities" of the EU Commission Environment, Oceans and Fisheries i.e., *Taking a zero-tolerance approach to illegal, unreported and unregulated fishing*, and *Contributing to WTO discussions on a global agreement to ban fisheries subsidies that cause overfishing, illegal fishing and overcapacity*, idem

¹¹³ Gilles Hosch, Lessons learned and MCS Policy Guidance from the IRFS-IOC-SmartFish program, IOC-SmartFish 2016

¹¹⁴ idem

especially in IUU “hotspots” in the WIO, as the HOA region, where IUU fishing continues unabated¹¹⁵¹¹⁶, mainly by longliners of Asian origin¹¹⁷. These vessels are also involved in a major way in transshipments, while purse seiners are believed to land their catches predominantly in port facilities. In the latter, the FAO PSMA, now increasingly adopted in the region with FAO/IOTC support, has the potential of becoming an effective instrument in combatting IUU fishing, as elaborated in previous reporting of the MTE.

However, concerning perspectives of comprehensively preventing, deterring, and eliminating IUU fishing in the WIO are limited at best. Reasons are multiple and include, *inter alia*:

- The region includes rogue states with fishing fleets ignoring international law, covenants and agreements, and flag state obligations, evidenced by players as the Iranian and Pakistani vessels using illegal drift nets¹¹⁸.
- The region also includes failing and failed states, where vested interests supersede efforts to use national resources for the common good¹¹⁹.
- The large ocean space beyond national jurisdiction which attract DWF fleets and which are protected by regional CMM only, with little realistic options to enforce them.

Neither of the above-mentioned “rogue actors”, and many of the DWF fleets operating in the region are likely to land their catches in port facilities applying PSMs but cater for their domestic, unregulated markets and/or tranship catches at sea.

The Programme specifically targets MCS of LS IUU fishing EEZs and in the high sea, with the IOC-PRSP being the principle means (“flagship”). Despite delays suffered and persistent structural problems with the IOC-PRSP (see EQ 3 above), the Programme achieved tangible results, the most visible the first sea patrol carried out since 2018. According to discussions with national CAs and other resource persons, sea patrols are an effective tool and “executive arm of resource management” if:

- Carried out on demand and in coordination with national CAs and complementing national efforts of enforcing compliance with national legal and regulatory provisions;
- Serve as training exercises for national enforcement efforts which, in case of shared or straddling resources, involving officers from the countries sharing the resource;
- Don’t refrain from “naming and blaming” repeat and notorious perpetrators, especially in case of grave infringement (fisheries crimes infringements or, in case of underreporting, fraud);
- Are effectively prosecuted and penalized by the states under the jurisdiction of which they have been committed;
- Being subject of local, regional and global media coverage regarding prosecution (or non-prosecution, making use of adequate V&C capacities (as those of the Programme).

In this way, successful patrols like the one carried out and those in the pipeline could reinforce the growing chorus against IUU fishing, increase the deterrence effect, and, possibly, attract more donor financing. In this context, and regarding financing of sea and air patrols, the MTE was not able to obtain conclusive documentation or conduct in depth KIIs to get details on the use of the grants allocated, by the Programme, to Mauritius, Comoros, Madagascar, Seychelles, Kenya, Tanzania and Mozambique, for funding regional and national MCS efforts, for reasons outlined in 1.4 above.

The MTE team lauds past and supports future Programme support e.g., supporting the implementation of PSMA to deter IUU fishing but does not expect means available to the Programme being sufficient to significantly reduce, not to talk of eliminating LS IUU fishing. This reservation is not only based on the donor financed and time bound nature of the Programme but is a general conclusion regarding IUU fishing in the IO, based on several idiosyncratic issues of the region *inter alia* the political economy and governance problems and the large ocean space beyond national jurisdiction mentioned above. The

¹¹⁵ See e.g., IGAD Regional Strategy for Fisheries and Aquaculture, Djibouti 2016

¹¹⁶ Another hotspot are the ABNJ adjacent to the EEZ of the Maldives, where sustainable pole and line fisheries create some “breathing space” for tuna resources and produce “spill-over” stock recovery effects.

¹¹⁷ Citing long liners (so called “blue boats”) that are invisible, i.e., not detected by VMS or radar, not licenced, not registered with IOTC or coastal states, and largely involved in IUU fishing, (J. Talma, pers. comm.).

¹¹⁸ Some observers opined that the drift netters mostly caught mature tuna and tuna like specimen which had spawned already, while catches within territorial waters by artisanal vessels, as well as purse seiners using un-anchored, floating FADs were likely to catch large amounts of immature mainly Yellowfin tuna.

¹¹⁹ E.g., with an MOU of 30 long liners of the Chinese DWF signed with Somalia to allow to catch tuna in Somali waters and against strong opposition from local fishermen.

paramount condition for deterring and effectively eliminate IUU fishing would be strong, consolidated, and ratified regional solidarity among the countries of the EA-SA-IO region and of the IO at large.

In this regard, the MTE team sees little prospect, at least in the foreseeable future, e.g., to follow the strategy of the Pacific SIDSs which successfully counteracted the “divide and conquer” strategy of DWF fleets when negotiating access to fisheries resources, and thus obtained more benefits from fisheries resources under their jurisdiction. To do so, all countries of the region closed ranks and adopted the “Parties to the Nauru Agreement (PNA)” where the Pacific SIDS agreed *to seek, without any derogation of their respective sovereign rights, to co-ordinate and harmonize the management of fisheries with regard to common stocks within the Fisheries Zones, for the benefit of their peoples*¹²⁰.

To achieve PNA the member countries agreed on *Harmonized Minimum Terms and Conditions for Foreign Fishing Vessel Access (MTC)*¹²¹. The MTCs specify consistent conditions across the region inter alia common regional licensing, a regional register of foreign fishing vessels and VMS, control and monitoring of transshipment, maintenance and submission of catch logs in EEZs and ABNJs alike.¹²²

The doubts of the MTE team were shared by all resource persons consulted e.g., the SADC and AU-IBAR representatives. This finding does not imply that, overall, enforcing national legal and regulatory frameworks and management plans including by MCS are not warranted. They can mitigate IUU fishing on regional scale and can be crucial for enforcing compliance in member countries, especially in countries which have limited or marginal MCS capacities. They can however not replace regionally and comprehensively harmonized access conditions and respective agreements as the essential driver of managing of tuna, tuna like and other straddling stocks sustainably, including by enforcing compliance to management provisions by strengthened MCS and deterrent prosecution.

¹²⁰ <https://www.pnatuna.com/>

¹²¹ www.ffa.int/system/files/HMTC_as_revised_by_FFC110_May_2019_-_FINAL.pdf

¹²² Both the PNA and the MTC were facilitated by most EEZs of the Pacific SIDS bordering each other, leaving, contrary to the IO ocean space, only limited ABNJs.

3. Lessons learned, Conclusions and Recommendations

3.1. Lessons learnt

To optimise the utilisation of the resources and funds in a reoriented Programme, lessons learned provide some subject matter related criteria which could guide the selection of actions and countries where the programme could deliver sustainable results. For a mutually agreed and owned reorientation, the lessons learned provide some strategic elements only; they cannot replace the comprehensive and inclusive stakeholder consultations recommended in 3.3 below.

A central lesson learned amply demonstrated in the finding of the MTE and echoed worldwide is that the root problem of most coastal and inland fisheries in the EA-SA-IO region and beyond is lack of political will and good sector governance. Political will and good sector governance, especially with respect to limiting access to fishery resources, is the *conditio sine qua non* for safeguarding them and the ecosystems they depend on for future generations. Only by safeguarding and restoring abundance and diversity of living aquatic resources and critical habitats can the ecosystems maintain or increase their social, economic, and cultural contributions to local economies, fishers and their communities and the fisheries value chains *eo ipso*. This lesson implies that sustainable use of fisheries resources e.g., by capacity management, combatting IUU fishing and enforcing compliance with legal and regulatory provisions, and safeguarding the aquatic ecosystems and coastal and riparian environments at large, is a “function of overall and sector governance”. Only good governance will foster willingness of stakeholders to participate in fisheries management processes for the common good.

This lesson is complemented by the lesson learned worldwide, and in the context of the Programme mainly from the grant projects under result 3, that participation in CBFM or co-management are, probably, the only efficient tools for enabling sustainable management of SSF and artisanal fisheries, inland and marine alike. Both CBFM and co-management depend on strong, accepted, legitimate, inclusive (gender, youth and the elderly) and representative institutions. Under open access regimes where the theorem of the “tragedy of the commons” is ever present, building such grass root institutions is a major challenge. This lesson is also applicable to the post-harvest VC. Therefore, promoting socio-professional organisations and associations (including fisherwomen organisations), community-based management organisations, cooperatives and social enterprises are indispensable to promote economic activities with equity objectives¹²³.

These lessons learned do not prove but support, if not a lesson learned but a hypothesis extended in the MTE findings i.e., that regional efforts by donor dependent and time bound projects are unlikely to sustainably leverage change with agendas and dynamics of regional organisations, in the case of the Programme, of RECs and intergovernmental and sector organizations. This hypothesis/lesson learned, can be applied to work plans 1 and 2, the sections of the marine fisheries work plans concerning SSF, and of work plan 4 of the Programme. This would imply that Programme efforts under these work plans should instrumentalize regional policies could apply them to their benefit and seek synergies and support, also by using them as reference in cases of internal dispute.

This hypothesis or lesson learned does however not apply to regional cooperation in conserving and managing tuna and tuna like species, in EEZs and ABNJ, through the enforcement of national legal and regulatory provisions and applicable RFMO's resolutions. Here, regional solidarity and harmonization of access conditions are the only feasible way out of the present situation where foreign DWF fleet and flag and/or port states continue to apply a “divide and rule” approach to secure access to the high value fisheries resources of the WIO. To have all countries of the EA-SA-IO region sharing the straddling stocks of tuna and tuna like species and agree on mutually agreed and collectively implemented harmonized conditions appear far-fetched at the time of this writing but is, probably, the only option for the long-term conservation and sustainable resource use.

3.2. Conclusions

Following the ToR of the MTE, conclusions are structured following the six OECD/DAC criteria plus the additional EU criterion of value added. Conclusions are based (i) by perusal of documents, KIIs and

¹²³ SmartFish has provided valuable experiences of management and governance initiatives in small-scale inland and marine fisheries at community level, some of which have yielded impacts with the potential of replication at regional levels.

FGDs carried out by the MTE team during the mission, and (ii) the feedback received on the structured interview format i.e., the ranking of the DAC criteria and the responses to the evaluation questions of the MTE included in Annex 2 of the Inception and Desk Report distributed to stakeholders. The responses, where relevant and pertinent, have been considered throughout this report, the ranking is presented in the following figures:

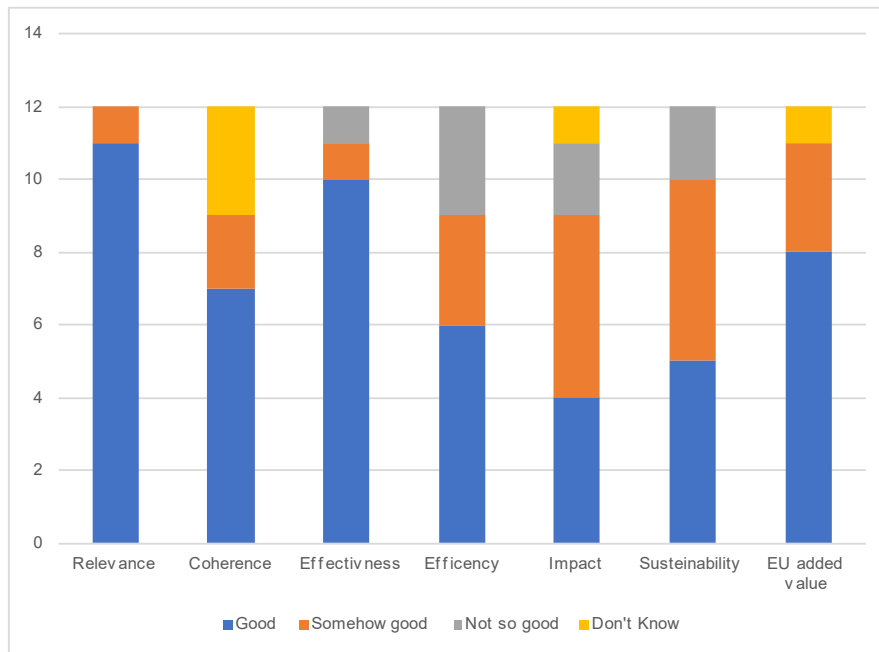


Figure 2: Responses to Evaluation Questions. DAC Criteria against ECOFISH Programme

The evaluation of the OECD/DAC criteria¹²⁴ based on the findings of the MTE is presented in the following. They take the findings of the MTE presented above with respect to the evaluation questions (EQ) into account. As the EQs were not structured in line with the OECD/DAC criteria, findings were not incorporated in their entirety but according to their place value for each criterion.

3.2.1. Relevance

The MTE team concludes that the Programme, its objectives, results, and work plans were and are relevant for the issues and challenges of fisheries in the participating countries and in the region, reflecting the present situation and trends of fisheries globally. A caveat regards the potential incompatibility of growth orientation included in the overall objective and the dictate of responsible and sustainable fishing included in both overall and specific objective, and discussed in depth above i.e., stating that

- Capture fishery resources are finite and can be used sustainably only if managed effectively i.e., when fish mortality caused by fishing does not exceed the capacity of stocks to reproduce, maintaining abundance and diversity of living aquatic resources , and
- Any upward and downward value chain produced social, economic and food security services become null and void if the ecosystems are depleted or damaged beyond repair, and result in supply uncertainties.

Considering the present state of fisheries resources and aquatic ecosystems, depletion of resources and mounting threats to critical habitats are acknowledged by fishers, local CAs, CSOs and academia alike, in concert with all observers and resource persons encountered by the MTE team during the mission. Depletion of resources were attested for practically all coastal and inland water resources and for straddling stocks of tuna and tuna like stocks (see figures 5 and 6 in the appendix to this report). It is only at high level policy making and strategy levels, national, regional and cross regional, where,

¹²⁴ Cited below, <https://www.oecd.org/dac/evaluation/dacriteriaforevaluatingdevelopmentassistance.htm>, in Italic

maybe *nolens volens*, postulates for increased production, growth and wealth creation are still maintained, despite of the sorry state of resources.

The Programmes specific objective, with its growth-exclusive postulate to support sustainable management and development of fisheries, is, therefore, more adequate, and relevant than its overall objective, which still includes growth, even if adorned with the disputable attribute of “equitable”.

With regards to result 1 the Programmes intended contribution to enhanced regional policies and institutional frameworks, and “leveraging” effective collaboration and cooperation with and among the DMROs would be relevant if achievable within its scope, means and duration, and sustainable beyond the latter. The MTE team reserves doubts about both, reasons for their reservation are discusses in the respective EQs above.

The contribution to the work plans 1, 2 and 3 under result 1, and achievements under result 2 are relevant for the Programmes goals but can only mitigate problems by improving frame conditions for sustainable resource management, supporting training, capacity building, and facilitating conducive institutional and normative frameworks, with the perspective of enforcing the latter. Support to inland fisheries resource management efforts of the two inland RFMOs LVFO and LTA was and is relevant and appropriate, despite and, maybe, because of the constraints encountered.

Regarding achievement attained to date and planned under result 2, the MTE team considers it relevant, as it deems them contributing to conducive conditions for management. The relevance of the joint patrols, carried out to date was increased significantly via the C&V effort of the Programme. Relevance of MCS efforts depend, however, on the political will and ability of member states to provide adequate legal provisions joint patrols and to enforce compliance by prosecution. Capacities created by, and funds provided by the Programme to CAs for MCS will be relevant only when used to limit and manage access to fisheries resources and ensure correct reporting catches.

Relevance of the Programme is attested, by the MTE team, for the SSF projects supported by grants under result 3. Here, relevance is significant because the Programme supports sustainable fisheries at grass root level, i.e., the only level were policies and strategies become tangible, visible and yield results. Despite of patchy monitoring, indications noted by the MTE team during field visits, virtual meetings, personal communication with project staff and resource persons, and gleaned from project reporting support the relevance of this result for overall Programme performance.

Finally, it was noted that some of the some of the strategic actions and related activities of the Programme¹²⁵ would benefit from scrutiny with respect to their relevance, pertinence and feasibility/cost benefits considering the need to make the Programme “leaner” and using resources judiciously. An example for this finding is the planned climate change observatory¹²⁶, which lacks pertinence considering the multitude of perennial climate change monitoring mechanisms, in the region and globally.

3.2.2. Coherence

Programme goals are coherent, in line with, and relevant for, the UN Sustainable Development Goals (SDGs): 1. End poverty in all its forms everywhere in the world, 2. End hunger, achieve food security and improved nutrition and promote sustainable agriculture, 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all, and, most relevant for the MTE, SDG 14: *Conserve and sustainably use the oceans, seas and marine resources for sustainable development*¹²⁷. Regarding the latter, goals are also coherent with other international postulates e.g., the Aichi targets *inter alia* 5, 6, 11 and 15¹²⁸ of the CBD¹²⁹.

Coherence is noted with overarching policies as the new European Consensus on Development which aligns EU development policy with the UN 2030 Agenda for Sustainable Development: people, planet, prosperity, peace and partnership, and the programmatic postulate of the EU Commission International

¹²⁵ See Technical Handbook op. cit.

¹²⁶ Another one which would merit an in-depth assessment of pertinence and relevance, especially regarding availability and reliability of data, is the regional fisheries scientific and socio-economic observatory

¹²⁷ <https://www.globalgoals.org/goals/14-life-below-water/>

¹²⁸ Aichi Target 5: Habitat loss halved or reduced; Aichi Target 6: Sustainable management of marine living resources, Aichi Target 11: Protected areas increased and improved, Aichi Target 15: Ecosystems restored and resilience enhanced

¹²⁹ <https://www.cbd.int/aichi-targets/>

Partnerships: *Building inclusive and equitable partnerships to reduce global poverty and support sustainable development*¹³⁰.

The Programme pledges coherence and collaboration with the EU-Fisheries Governance Programme II and other ongoing regional initiatives¹³¹ supporting dialogue and sensitisation at regional (REC) level on existing and emerging issues and challenges of the sector. This is also line with the objectives of the African Fisheries Reform Mechanism (AFRM), which *supports information sharing on lessons learnt and best practices, enhances communication, fosters institutional collaboration, promotes partnerships, strengthens evidenced-based policy formulation and promotes integration or mainstreaming of the fisheries and aquaculture sector into AU policy processes, and increases common African positions in regional and global fora*¹³².

At regional level, Programme goals are in coherence with the African BE discussed above and in previous reporting and reiterated in the Appendix to this report. At subregional level coherence and compatibility with several policies were noted, *inter alia* with:

- The 2001 SADC Protocol on Fisheries which promotes responsible and sustainable use of living aquatic resources and aquatic ecosystems, enhancing food security and human health, safeguarding livelihood of fishing communities and generating economic opportunities¹³³.
- The 2016 Intergovernmental Authority on Development (IGAD) Regional Fisheries and Aquaculture Strategies and Action Plan¹³⁴ which was developed and adopted with the financial support of EU. IGAD's regional strategy identifies strategic objectives, key priority areas and strategic interventions separately for marine capture and inland capture fisheries and aquaculture.
- The COMESA Medium-Term Strategic Plan 2016-2020¹³⁵ which formulates strategic objectives to facilitate cross-border trade through the removal of trade barriers in the context of fostering free trade and of strengthening the Blue Economy.
- The EAC Regional Vision 2050 for socio-economic transformation and development identifies six pillars with fisheries development featuring prominently, and SSF recognised for its contribution to employment, food security and income in the region¹³⁶.

These objectives do not conflict with those of the EU's priorities for fisheries in the East Africa-South Africa and Indian Ocean region that include: promoting sustainable fisheries, enhancing regional cooperation, strengthening the capacity of local stakeholders, and promoting trade and economic development. These priorities are supported through various policies and initiatives, such as:

1. Sustainable Fisheries Partnership Agreements (SFPAs): The EU has signed SFPAs with several countries in the region, including Madagascar, Mauritius, and the Seychelles. These agreements aim to promote sustainable fisheries and responsible fishing practices, while also providing support for local fishing communities.
2. European Development Fund (EDF): The EDF provides funding for a range of development projects in the region, including those related to fisheries and aquaculture. Projects supported by the EDF include improving the management of fishery resources, enhancing the capacity of local stakeholders, and promoting sustainable economic growth.
3. Indian Ocean Tuna Commission (IOTC): The EU is a member of the IOTC, which is responsible for the conservation and management of tuna and tuna-like species in the Indian Ocean. The EU works with other IOTC members to promote sustainable fishing practices and improve the monitoring of fishing activities.
4. European Maritime and Fisheries Fund (EMFF): The EMFF provides funding for a range of projects related to fisheries and aquaculture in the EU and its partner countries, including those in the East Africa-South Africa and Indian Ocean region. Projects supported by the EMFF include improving the sustainability of fishing practices, developing aquaculture facilities, and enhancing the capacity of local stakeholders.

¹³⁰ https://en.wikipedia.org/wiki/European_Commissioner_for_International_Partnerships

¹³¹ Technical Handbook, op. cit.

¹³² <https://www.au-ibar.org/au-ibar-news/upcoming-event-fisheries-governance-2-project-second-project-technical-coordinating>

¹³³ SADC Protocol on Fisheries, 2001 <https://www.sadc.int/pillars/fisheries>

¹³⁴ IGAD Regional Strategy for Fisheries and Aquaculture op. cit.

¹³⁵ <https://www.comesa.int/wp-content/uploads/2020/05/COMESA-MTSP-2016-2020.pdf>

¹³⁶ <http://repository.eac.int/handle/11671/567>

5. Blue Economy: The EU's Blue Economy initiative aims to promote sustainable economic growth in the maritime sector, including fisheries and aquaculture. The initiative includes funding for projects related to the sustainable use of marine resources, the development of sustainable aquaculture, and the promotion of sustainable fishing practices.

The Regional Strategy for Fisheries and Aquaculture of the Indian Ocean Commission 2015-2025¹³⁷ developed with EU/SmartFish support was never adopted, and the MTE noted significant overlaps with other regional strategies and policies.

3.2.3. Effectiveness

The Programme objectives and results provided, not uniformly, in the Action Fiche¹³⁸ and the TAT Handbook¹³⁹ have been attained to varying degrees of effectiveness. Regarding the hierarchy of objectives, the MTE agrees with their causal logic, retaining some reservation with respect to the likely incompatibility of increased production, growth and wealth creation and sustainable fisheries as discussed above.

With regards to the postulated enhancement of regional policies and institutional frameworks, and of leveraging regional economic collaboration and cooperation with DMROs and RFBs under result 1 of the Programme, the MTE team has not been provided evidence for effectiveness of respective Programme efforts to date. Regarding its scope, means and duration, the MTE team reserves some doubts as to whether the Programme, being donor dependent and time bound, has the calibre for effectively leveraging collaboration and cooperation with and among the DMROs, FMBs, RFMOs and national CAs.

The former three have their own agendas which are determined by their accountability to member countries, the interests of which are not always easy to harmonize within the organizations and among them, the latter are part of complex and hierarchical national administrative frameworks. The MTE team considered it unlikely that the Programme will be a game-changer with respect to political economies of capture fisheries in the region by leveraging change of regional and national agendas.

Regarding Programme governance and management, the complex and complicated multi-layered design of the Programme also see the risk that the implied efforts sap the limited HR and logistic capacities the TAT, IOC and implementing partners alike. Subtracting resources could reduce capacities for achieving the results postulated under the specific objective of fostering sustainable fisheries, and limit contributions to the achievements of the overall objective.

Contributions to the work plans 1 and 2 under result 1 (see findings e.g., in the response to EQ 3 above) have been effective but can only mitigate problems, within the limits of HR, duration and logistic and financial means of the Programme. Support to LVFO was tangible and effective for the lake-wide frame survey and for the efforts to build capacities for MCS. For MCS capacities to yield effective results, however, they need to be applied and further developed, learning by doing, during frequent regional patrols.

Such patrols, in turn, will depend on the political will of the CAs of the riparian countries e.g., to commit the necessary resources including using the funds allocated to them for MCS by the Programme. The dismal state of lake stocks and ecosystems justify doubts, however, of the political will, at least retrospectively, of riparian countries to confront present and emerging challenges via such patrols. The MTE team could not evidence ability of the Programme to effectively influence political will and ensure use of allocated grants for MCS, because of time and logistic constraints mentioned in 1.4 above.

The provision of NKE facilitated the administration and accounting of the allocated funds according to EU procedures but no spill over effects building respective and sustained capacities of the organization were noted.

Regarding LTA, the Programme contributed effectively to creating frame conditions conducive to MSC and Fisheries management. These cannot be put to effective use, however, stymied by the dysfunctionality of the implementation arrangement (see EQ 3). Despite of this, the Programme refrains, to date, to take a position (“interfere”) in the issue, thereby also refraining from allowing the

¹³⁷ <https://www.fao.org/3/br824e/br824e.pdf>

¹³⁸ Contribution of Sustainable Fisheries to the Blue Economy of the Eastern Africa, Southern Africa and Indian Ocean region – EEOFISH programme, CRIS number: RSO/FED/039-977

¹³⁹ Op. cit.

operationalising the use of Programme allocated funds with respect to fostering management and sustainable fisheries of the lake.

As a general remark, the MTE Training opines that, as argued for LV, training and capacity building are effective only if the acquired skills are used in concrete actions, and efforts are evaluated, and adjusted to respond to changing realities. One stop training and capacity building efforts will not be effective and sustainable if not applied regularly, as a tested and practical “toolbox” for resource management.

Concerning the Marine Fisheries work plan under result 1, no effective and tangible support to legal and regulatory frameworks of SS and artisanal coastal fisheries attributable to direct Programme intervention (beyond the grant projects under result 3/work plan 4) was recorded. The “flagship” of EU efforts to fight IUU fishing in the EA-SA-IO region, the IOC-PRSP, remains a donor dependent administrative arrangement between member countries; its often-postulated institutionalization remains a postulate and the MTE team doubts that the Programme has the means and calibre to effectively overcome this impasse.

The implementation of result 2, strengthening capacity to prevent, deter and eliminate IUU fishing, has been effective with respect contributing to conditions conducive to enforcement of compliance by developing respective regional protocols, standards, and procedures. Improvement of MCS capacities at national levels will depend on how effective and efficient the grants allocated to CAs are or will be used¹⁴⁰. Efforts to facilitate much needed and sufficiently deterrent prosecution and sanctioning of infringements of fisheries regulations and lack of reporting or under-reporting of catches in areas under national jurisdiction and regarding local vessels fishing outside national waters are in the pipeline.

A visible showcase of Programme effectiveness are the regional patrols with EU/French support (see respective EQs above and MTE Intermediate Desk and Field Note). Effectiveness is evidenced by the number of infringements detected; visibility was enhanced significantly with support of the Programmes C&V component. It is noted that the joint patrol was the first of its kind since discontinuation of the SmartFish Programme, and that a planned second joint patrol was cancelled due to the unwillingness of Mozambique to commit funds allocated, assumingly, by the Programme to national CAs for enhanced MCS.

Regarding joint surveillance patrols, the MTE team does not doubt their rationale and effectiveness as a deterrent to IUU fishing. Carrying out patrols can mitigate impacts of otherwise unabated fishing crimes if perpetrators are “named and blamed” by effective C&V, and if consequently prosecuted and adequately sanctioned. This can be particularly crucial for member countries which have limited or marginal MCS capacities enforcing compliance. While, if carried out with some frequency, they can mitigate IUU fishing. To comprehensively combat and eliminate IUU fishing, frequency the number of patrols required would possibly test the balance of costs and benefits.

MCS and enforcing national legal and regulatory frameworks and management plans leading to correctly report catches would facilitate regulation of fishing effort and significantly improve chances of regional management of straddling tuna and tuna like stocks. To be sufficiently deterrent, this would require however that underreporting is sanctioned as fraud under respective penal codes, and that legally binding instruments as PSMA are followed.

In summary, the effectiveness of future joint patrols may be insufficient to deter IUU fishing and cannot replace regionally harmonized access conditions¹⁴¹ and respective regionally inclusive agreements for the management and MCS of tuna and tuna like stocks¹⁴². The MTE team considers that respective changes of the present, largely open access regime as doubtful, at least in the short and medium term. The doubts of the MTE team were shared by DMROs as SADC, AU-IBAR representatives, and other resource persons consulted.

Regarding the SSF projects allocated grants under Result 3, Work plan 4 of the Programme, the MTE team concludes that, overall, effectiveness can be attested. This conclusion is based only on the short visits to some of the projects and the limited opportunities to talk to all stakeholders. However, FGD and KII interviews, together with perusal of project documents, support the assessment of SSF grant project’s effectiveness, if only because support is at grass root level, where policies and strategies

¹⁴⁰ The MTE did not obtain secondary information on the subject and the limited timeframe of the mission did not allow for the compilation of primary data in the countries visited.

¹⁴¹ As cited for the Pacific Ocean Island States in EQ 14 with respect to the Parties to the Nauru Agreement

¹⁴² *inter alia* by common regional licensing, a regional register of foreign fishing vessels and VMS, control and monitoring of transshipment, maintenance and submission of catch logs

become effective, visible, and yield tangible results, with the potentials of spill overs, multiplication, impact, and sustainability.

3.2.4. Efficiency

The efficiency of the Programme was affected by several external factors, of which the COVID 19 pandemic was the most evident. The Pandemic did not bring activities to a standstill but limitations of effective communication, the need for working from home, teleworking and videoconferencing with implementing partners, imposed constraints on Programme implementation. The same is valid for mobilizing patrol missions under the IOC-PRSP because of restriction of travelling for inspectors and mandatory physical distancing on board. While the COVID 19 also affected timely recruitment of staff and operationalization of the programme in general, there were also problems originating from IOC intrinsic problems e.g., complicated procurement procedures and establishing the Integrated Programme Management Unit (IPMU). Respective problems were mentioned in the last six-monthly interim report¹⁴³; in the preceding report there was no mention of respective problems, however.

From the six-monthly reports for the previous years¹⁴⁴, it could not be established whether other factors besides the problems related to IOC, the pandemic and changes in the TAT teams caused delays in the Programme and its various work plans. Regarding the latter, the MTE Mission noted that the KE2 Fisheries MCS as well as the KE3 Communication and Visibility Expert had been replaced, on the grounds of EUD Mauritius' complaints about the performance of KEs not being in line with the directives received. The MTE could not establish reasons for the replacement of KE3. However, the substantial changes of the TAT that replacing two of the three KEs caused, especially during a time when recruiting new KEs was particularly difficult because of the Pandemic, certainly led to further delays in the efficient implementation of the Programme.

In addition, in the sixth semester, the TL had to make up for activities that were not carried out previously due to travel restrictions with a substantial number of missions outside Mauritius, prioritising technical monitoring over coordinating implementation of the Programme and its work plans (75 days according to Annex 1 of the 6 Month Interim Report of 31 July 2022). This imbalance is confirmed by what is stated in the cited Report: *"From now on, the TAT will concentrate on its core mandate 1.e., policy advice, strategic orientation, technical coordination, effective collaboration and cooperation and synergies with the other related programmes."*

The MTE noted that several stakeholders expressed the need for and aspiration of more 'technical' support from the TAT, as well as for longer duration of support missions, possibly with the help of NKE, in order to improve their performance in certain areas such as C&V. Furthermore, the MTE noticed some lack of interest on the part of many focal points and therefore a disconnect between the TAT and field activities in some of the work plans, a problem that should have been addressed and resolved as it certainly created problems in the smooth running of activities. Virtually all Work Plans are (more or less) delayed.

Work Plan 1 (LVFO): The LVFO built on previous EU-funded programmes, in particular on managerial capacities built by SmartFish and through the implementation of the Fisheries Management Plans I and II, the framework on which this project is building in planning and implementing co-management/MCS strategies. Despite the COVID-19 related problems faced by the entire Programme, the project managed to at least partially achieve the planned outputs through a combination of virtual and in-person interventions (see EQ 3) even though the level of fund utilisation is lower than foreseen (just over 20% against 40% to be committed for the Actions planned by 2021).

The cooperation between the riparian states and with the LVFO provided the prerequisite for carrying out various actions, among which the recruitment of a number of consultants necessary for the implementation of the actions is of notable importance. The latter also enabled the conduct of meetings

¹⁴³ TAT/INCATEMA 6-Month Interim Report 31,7.22, op.cit.

¹⁴⁴ The last of the first semester of 2022

with the LTA to evaluate the possible transformation of the two RFMOs into an East Africa Fisheries Organisation (EAFO).

The visibility programme both among stakeholders and externally comprises several media outlets including LVFO newsletter publication, ECOFISH-quarterly newsletter, radio, TV and newspapers. The work carried out demonstrates good efficiency even if, as indicated above (EQ3), the MTE has doubts that actual result achieved will solve the core problems of overfishing and depletion of lake fisheries resources, especially Nile Perch.

Work Plan 2 (LTA): The LATAFIMA Project suffered major delays in the order of 12 months due to the COVID 19 pandemic, but mainly due to the inability of FAO and its team to provide the necessary resources (both human and financial) in due time. Despite this, the programming of activities has not been revised. The level of expenditure is at a low level in line with the low level of implementation of the Programme. It stands at approximately €570,000 (28% of the disbursed budget) with a significant imbalance in favour of expenditure for HR and travel. Implementation to date revealed poor implementation of activities at all levels. Poor involvement of government partners, poor knowledge of the project by the final beneficiaries, very weak support to the field activities, almost no communication and visibility at the landing sites and on digital sites and media. The equipment for the MCS units, which the project was supposed to procure, has not yet been purchased, because the tender has not yet been launched. The situation of the national project supervisors, who were never paid at the time of the MTE Mission, is a clear example of the inefficiency of FAO's project implementation procedures.

Work Plan 3 (Marine Fisheries IOC – Result 1 and 2): The MTE team noted that during the early years of the Programme the implementing agency, IOC, had difficulty in starting the programme. This is also indicated in the TAT Report¹⁴⁵ that states that *“the PMU, particularly the IOC Secretariat, are underperforming. Apart from COVID-19 new normalcy, other structural shortcomings have been observed that undermine their implementation capabilities.”* As noted above, the IOTC and SIOFA, the only RMFO in the marine fisheries sector, were not involved in the formulation of the Programme, which caused a lack of efficiency in the start-up of the Programme (especially regarding IOTC), considering that the MOU to formalize cooperation between IOTC and the Programme had not been signed at the time the MTE team visited Seychelles.

The MTE noted during interviews a certain grade of disagreement among the TAT, the EUD and the IOC, confirmed in the 6-Month Interim Report¹⁴⁶ that the *TAT paid more Attention to the Marine Fisheries Work Plan and the IOC-PRSP (...)* However, the IOC Secretariat does not acknowledge the extra efforts, but claim them as a right and became more demanding. As a result, there is an ongoing discussion between the latter (IOC Secretariat) and the EUD Mauritius regarding the TAT work scope¹⁴⁷

The cancellation of the IOC-PRSP mission in 2022 using the patrol vessel from Madagascar (see EQ 3) indicates the need for better coordination between the different member countries participating in the Joint Patrolling Programme and the timely management of funds for their execution. Regarding the MCS *“the process of recruitment has encountered extreme delay and, to date (end of July 2022) a contract has not been signed between IOC and the selected contractor since 24th May 2022”*¹⁴⁸.

Work Plan 4 under Result 3, SSF pilot/lab projects: All the projects visited by the MTE team demonstrated evidence of efficiency in the implementation of the projects as well as of funds commitment and expenditure, particularly those projects that apply a Participatory Local Development Strategy. This Efficiency (and consequent effectiveness, see EQ 3) were demonstrated by the in-depth knowledge of the operators of the NGOs implementing the Projects, both of the environmental and the social context in which they operate. Moreover, many of them have already been operating for many years in resource management and conservation, and do not need any experimental or learning phase.

¹⁴⁵ ECOFISH 6_Month Interim Report of 31st of July 2022 (op. cit)

¹⁴⁶ Op cit

¹⁴⁷ ECOFISH 6_Month Interim Report of 31st of July 2022

¹⁴⁸ Idem

Nevertheless, more than one Project has requested an increased TAT experts presence and responsiveness, in particular for more opportunities of networking with other projects.

The MTE teams conclusions regarding efficiency of these projects are based on first hand observation and consultation only for the projects visited physically by the project; for the projects consulted virtually or evaluated on the base of available reports, findings do not provide grounds for assuming inefficiency. Empirical data and ground truthing to validate this has been recommended under 3.3 Operational recommendations.

The following table gives an example of planned and incurred expenditure and percent of delivery for Result 1.¹⁴⁹ The MTE team had not able to validate the committed budget lines and percentage of expenditure in toto, because of time and other constraints.

3.2.5. Impact

Given that the team is carrying out a MTE of a Programme which has incurred considerable delays during the early stages of implementation (see 1.4 above), its impact, in the sense of the OECD/DAC criterion, can be assessed tentatively at the very best, and with regards to longer term higher-level effects e.g., multiplication of positive achievements and larger scale application of lessons learned only.

Assessing any intended or unintended impact on higher-level applying with the yardstick of the hierarchy of objectives, both overall *to enhance equitable economic growth by promoting sustainable fisheries in the EA-SA-IO region.* and of its specific objective *to contribute to poverty alleviation, food and nutrition security, while addressing climate change resilience and enhancing marine biodiversity,* is problematic at best. Reasons are varying. For results 1 and 2 they concern the limited degree of delivery to date (see “effectiveness” and “efficiency” above), the lack of plausible indicators (see 3.3 Recommendations below) to gauge chances of future impacts, and the shortcomings of the logical framework regarding quantified targets and inadequate assumptions for their achievement.

According to the findings of the MTE team, only result 3, work plan 4, for which, apparently, no logical framework/PE is available¹⁵⁰, provides basis for the projection of multiplication and higher-level impacts. One of the SSF grass-root projects, where multiplication has already taken place and lessons learned disseminated beyond the project area, the Mwambao Coastal Community Network project in Tanzania (see above) impacts need to be contributed, to a considerable degree, to past development assistance efforts, as SmartFish. However, further Programme support could target new areas where the approach could produce comparable results.

Nevertheless, overall and in full consideration of the variety of approaches employed, the impacts achieved on the ground are already tangible, with the potential of being replicable i.e., having longer term impacts. Regular and structured monitoring, facilitating horizontal exchange of lessons learned, and increased efforts of the Programme’s C&V component would be helpful, to raise project profiles and to increase chances of impact and multiplication as postulated by the DAC criterion.

Intended or unintended, higher-level effects were not recorded, possibly because Programme interventions did not include subsidies or other perverse incentives.

3.2.6. Sustainability

Sustainability of time bound, externally financed development assistance interventions is notoriously difficult to assess, especially at mid-term. Uncertainty of sustainability leads many donors to obligatory request an exit strategy in programme/project design. For the Programme, the assessment of sustainability by the MTE team allows a variety of conclusions.

Regarding enhanced regional policies and institutional frameworks and leveraging of effective collaboration and cooperation with DMROs and RFBs postulated under result 1. Outcomes will most probably not be sustainable beyond the Programmes completion, for reasons discussed in the respective EQs above and the unlikelihood that externally financed and donor driven programme/projects will be able to influence existing agendas and/or vested interests, be they for the common good, or for short term political and economic gains.

¹⁴⁹ Program Estimate Marine – Result 1 Progress Report Marien PE (ECOFISH R1: Planning 2021/22 Att. % achieved (indicative)

¹⁵⁰ At least, except for a very generic, rudimentary log frame presented in Annex 2 of the MTE ToR, no PE/log frame, as developed by the Programme for results 1 and 2, was provided to the MTE for result 3

Similar, impact of training and capacity building, and facilitating conducive conditions for sustainable sector management and MCS will dissipate if acquired skills and strengthened capacities are not applied and conducive conditions are not used for the benefits of sustainable resource management. Both need feedback, adjustment, and incentives, for individuals and institutions alike, by producing sustainable benefits. For institutions such benefits could include acknowledgement of achievements by their peer institutions and improved inter-agency cooperation. For individuals, as enforcement officers, adequate remuneration and transparent careers would improve individual engagement and sustainability of capacity building.

The tangible and visible results achieved by the SSF projects allocated grants under result 3 have a good chance of being sustainable as many are embedded in local institutions, whether communities and/or local CAs. Conducive for sustainability are acceptance, ownership which depend on participatory appraisal, implementation and (self-) evaluation, for which the MTE team sees scope for improvement.

The conclusion that the SSF project have a greater potential of being sustainable is based on the fact that their principal actors are part of the private sector, whether SSF, artisanal fishers or value chain operators and MSMEs/MSEs. Development assistance extended to them, in a participatory way and addressing them individually or via legitimate and representative community and socio-professional organizations are, in general, more sustainable than institution and capacity building at national and regional levels. Therefore, empowerment and supporting private sector actors and organizations also provide opportunities for successful exit strategies, avoiding dreaded “end of project” debacles.

Chances of sustainability are further enhanced by successful CBFM and community based MCS. For CBFM, conditional for sustainability are sustainable benefits realized by participants, which, in fisheries, depend on restored stocks and habitats. For successful MCS, awareness of the need for managing resources sustainably and responsibly, and participation of community representatives in inshore coastal and inland MCS could be a crucial element. This is well worded in a lesson learned from the SmartFish Programme cited above, under “sustainability: *Stock recovery, providing the benefit of better catches and alleviating poverty, is a crucially important outcome of better MCS. In the medium term, stakeholders will only be able to fully commit to fishing legally if stock recovery and higher financial returns are a result of enhanced MCS. In the absence of stock recovery, the only tangible result of an enhanced MCS regime is more poverty, and concludes Community-based MCS work does not start with MCS, but ends in MCS* ¹⁵¹.

3.2.7. EU added value

The following actions bring added value to other ongoing projects and Programs:

- The strengthening of the process of moving towards enhanced regional cooperation and integration.
- The governing and managing fisheries resources regionally and improving and harmonizing regional and national policies.
- The improvement of transboundary coordination and cooperation mechanism for MCS and joint patrolling for illegal, unreported and unregulated (IUU) fishing.
- The training and capacity building of CAs.
- The realization of pilot actions promoting co-management and community fisheries management
- The support to governance improvement and private sector and community participation improvement and/or development at the sub-national and local level.
- The replication of the environmental and socio-economic pilot actions.

It should be noted that without the intervention of EU funds and Programme strategies, the results achieved by the previous projects (SMARTFISH), of which ECOFISH is the natural multiregional follow-up, would probably have slowed down or vanished, as happened e.g. with the MCS Surveillance Centre in partner countries, which ceased due to lack of funds when the previous EU funding ended.

¹⁵¹ Fostering successful MCS policy making in the WIO, Lessons learned and MCS Policy Guidance from the IRFS-IOC-SmartFish program, G. Hosch, 2016

The initiation and presence of ECOFISH is also synergetic and functional to the consolidation of other EU-supported projects in the same area, which often support the same stakeholders or partners of the ECOFISH Programme, among others:

- FISH-GOV 2 (completion 2025) whose implementing partner is AUDA - NEPAD and whose aim is enhancing sustainable fisheries management and aquaculture development in Africa. The project provides accelerated reform to the sector, and is a follow-up of the First phase of the Fisheries Governance Project (FishGov 1) that was implemented between 2014 and 2018.
- FISH4ACP (Completed 2022, and which operates on the same field and in some of the same countries, such as Tanzania, concerning Lake Tanganyika. Its goal is to strengthen fisheries and aquaculture value chains, contributing to economic growth, social equity and environmental sustainability.
- VicInAqua, concluded in 2019, and whose aim was to follow an integrated approach in order to develop a sustainable combined sanitation and recirculating aquaculture system (RAS) for wastewater treatment and reuse in agriculture in the Victoria Lake Basin area.
- FISHTRADE project: *"Improving Food Security and Reducing Poverty through intra- regional Fish Trade in sub-Saharan Africa"* implemented by WorldFish, NEPAD and AU- IBAR with the objective to improve intra-regional fish trade.
- Sustainable Fisheries Partnership Agreements (SFPA) concluded by the EU with Mauritius, Madagascar and Seychelles under the Common Fisheries Policy that can be used to strengthen MCS capacities or improve compliance with the RFMOs' resolutions and recommendations, to be supported by ECOFISH and the new protocol.
- Support to IOTC by DG MARE action grants to providing assistance to foster compliance, supporting the implementation of the Regional Observer Scheme, and others.
- EDF10 Programme to promote Regional Maritime Security (MASE) as well as EU CRIMARIO: Whose goals are to enhancing the maritime situational awareness in the Indian Ocean, in order to enhance security at sea with joint patrolling, and to develop operational policies capacity, respectively.

The Programme is also synergic with programmes and projects funded by other organizations and agencies, namely FAO, World Bank GIZ etc. such as SWIOFish to enhance the Observer Programmes (MCS) in SWIOFC member states, The Global Environmental Facility tuna fishery and biodiversity conservation project implemented by FAO, Global Maritime Crime Programme (GMCP) of UNODC and to the Biodiversity Mainstrimming Platform of FAO to promote and facilitate the adoption of good practices.

The Programme ECOFISH reinforces policies at the regional and sub-regional level as outlined above in the coherence section and strengthens the European policy in the sector and its international partnerships.

3.3. Recommendations

3.3.1. Overall recommendations (to EUD and implementing partners)

Overall considerations

The Programme's essential strategy element is MCS. MCS features prominently work plans 1,2 and 3 under result 1, is the *"raison d'être"* of result 2, and part and parcel at local, grass root and community levels SSF grant projects under result 3. MCS is understood as complementing sustainable fisheries management plans and frameworks¹⁵², as its executive arm, to enforce compliance. The MTE recommends MCS to remain the common fabric of the Programme, as a thematic "umbrella" under which streamlined, "leaner" efforts can be subsumed, and non-essential strategic actions can be queried. This recommendation was supported by DMROs, CAs and other stakeholders consulted.

¹⁵² by CAs of member countries for their EEZs and conservation and management measures by RFMOs

The same support was registered regarding the recommendation of the MTE Team to reflect, in a revised Programme design, the already *de facto* separation of management and MCS of SS and artisanal fisheries in coastal and inland waters from management and MCS of large-scale commercial fisheries of tuna and tuna like species within and beyond areas under national jurisdiction. Management measures and MCS applied solely “from above” may be a realistic option for MCS of LS and be the only one for DWF vessels. They will fail in inland and marine SSF and artisanal fisheries if not done in participatory fashion, fostering acceptance and ownership of measures aiming at limiting access and decrease resource pressure.

In this context the MTE team consciously refrains from recommending policies, made again and again, to replace sustainable management by access restrictions, protecting and restoring habitats (including by non-take areas), and stock recovery, with the political “silver bullet” of creating “alternative or supplementary incomes and employment”, to mitigate negative impacts on livelihoods. Alternative employment is non-sensical in “last resort fisheries” i.e., where fishing is the last resort and where fishers have no livelihood alternatives other than fishing, even if it means “fishing down the food chain” to the extent that stocks collapse altogether. The same applies to supplementary, often subsidized income opportunities, which will keep fishers from exiting the sector and continue exploiting stocks unsustainably, with the same catastrophic consequences for fisheries resources and the ecosystems they depend on.

Overall recommendation 1: Program extension

The **first overall recommendation**, instigated and supported by responses received from the consulted DMROs, implementing partners, fisheries sector CAs and grant recipients met before, during and after field phase, face to face or virtually, regards an extension of the Programme¹⁵³. The MTE team supports an extension of the Programme on the basis of the findings and conclusions discussed of above, and in previous reporting¹⁵⁴. The rationale for extending the Programme can be outlined as follows:

- The necessity to extend the duration of the programme¹⁵⁵ considers the delays incurred in the early stages of the Programme, regardless of whether caused by COVID 19 and travel restrictions imposed by the pandemic, late recruitment of regional or early replacement of international staff, administrative hurdles, or hick ups caused by some of the implementation arrangements and Programme architecture. They have affected the state of delivery to date, delivery in the “pipeline”, and the need for further delivery towards achieving results.
- Another, at least equally eminent reason for extending the project duration, is the sheer magnitude of the combined tasks of the *multifaceted and cross-regional* Programme, as listed in the Technical Handbook¹⁵⁶, under three results, five work plans and a respective plethora of strategic actions.

Overall recommendation 2: Programme reorientation

Considering this, and the present state of delivery, the **second overall recommendation** of the MTE team is to base a revised, reorientated Programme, and any extension of it, on comprehensive stakeholder consultations, to achieve the acceptance and ownership essential for getting them on board and ensure consensus. The length of the extension should be decided during the consultations; in the view of the MTE an extension of 18 months appears appropriate.

Consultations should review the Programme based on the findings and conclusions of the MTE. The review would take stock of what has been done and what remains to be done in a workshop involving all stakeholders in a fully participatory way. It would use project design as laid out in the Action Document, the Technical Handbook, and TAT reporting on progress, comparatively, as yardsticks, and positions of stakeholders as reference, rationale and justification of extension and reorientation. Regarding the latter, it would scrutinize the need for some of the “facets” in terms of pertinence, sustainability, and availability of remaining logistic and budgetary means¹⁵⁷. The overall goal of the

¹⁵³ The length of the extension suggested during consultations was not uniform but mostly in the region of 18 months following the initially scheduled completion of the Programme and including a closure phase to be determined

¹⁵⁴ See the MTE Intermediate Field and Desk Note of 5 December 2022

¹⁵⁵ According to the Action Document for Contribution of Sustainable Fisheries to the Blue Economy of the Eastern Africa, Southern Africa and Indian Ocean region, extensions of the implementation period may be agreed by the Commission’s authorizing officer responsible by amending this decision and the relevant contracts and agreements; such amendments to this decision constitute non-substantial amendment in the sense of Article 9(4) of Regulation (EU) 2015/322.

¹⁵⁶ Op. cit.

¹⁵⁷ As an example, the MTE cites the “Regional Coastal Marine Climate Change Observatory”, referring to the already existing plethora of climate change “watchers” at national, regional and global levels

consultations should be to make the Programme “leaner”, not necessarily “meaner”, realistically taking Programme resources, especially the LTE HR of fisheries management, MCS and C&V, and the remaining NKE and STE resources into account. In the view of the MTE, priority should be on the SSF projects allocated grants as outlined in the respective evaluation questions above, in concert with the efforts regarding SSF foreseen under work plan 3. Following this in order of priority should be to continue Programme interventions under result 2, and to consolidate past efforts and extend Programme assistance under work plans 1 and 3, as outlined above.

From its findings, the MTE team recommends, as a working hypothesis of an approach for the consultation, to focus on sustainable sector management, putting sustainable use of resources, their protection and recovery, as well as conservation of habitats and aquatic habitats before postulates of growth and increased production, as advocated throughout the MTE reporting. This recommendation is also based on findings of the MTE team which indicate receptiveness, on the part of the stakeholders consulted, of a paradigm shift from production and growth to sustainable use and protection of resources, replacing high flying postulates for prosperity and wealth creation by “unleashing” the potential of a sector which is ailing, at best, with severely depleted stocks, some of them on the brink of collapse.

Focusing Programme support on sustainable management and MCS would allow revising the logical framework and formulate a concise, result oriented theory of change (ToC) in line with the recommended paradigm shift. It would also provide an opportunity to review objectively verifiable indicators (OVIs), sources of verification and assumptions, making objectively verifiable indicators (OVIs) SMART¹⁵⁸ and conducive for effective M&E. In the following the MTE team attempts proposing central elements and requirements of a ToC/log frame outlines and takes main findings, conclusions, and recommendations of the MTE into account. The reconstructed log frame/outline considers a comment of EUD Mauritius i.e., to *the LVFO, LTA, IOC and PRSP as standalone projects to develop actionable recommendations for both results plus any relevant cross-cutting issues*^{159 160}.

The log frame outline regroups the work plans (to be by stakeholders) and is tentative at best. It warrants the comprehensive and in-depth stakeholder consultations recommended above, to develop a mutually agreed, validated and owned log frame including specific activities, indicators, assumptions etc. Understanding the EUD comment/recommendations as mentioned above, i.e., to elaborate work plans separately, it subsumes regional harmonization and cooperation under the different work plans, not as a “one fits all” effort but as a work plan integral and specific strategic element. With regards to the marine fisheries work plans, for example, it clearly differentiates industrial and semi-industrial fishing for straddling stocks of tuna and tuna like species from SSF and artisanal, rural and semi-urban inshore coastal and inland fisheries, also in terms local, national and regional cooperation and synergies.

¹⁵⁸ SMART OVIs are Specific, Measurable, Achievable, Relevant and Time-bound

¹⁵⁹ Consolidated comments on the MTE Intermediate Field & Desk Report, 1.0 Comments by EUD Mauritius

¹⁶⁰ This is somehow relativized by a comment received from the ECOFISH TAT TL on the PPT presentation to the Reference Group of 16 January 2023 that the MTE’s assessment of the other WPs : LVFO/LTA/IOC, PRSP as standalone project has been insufficient to understand the contribution of ECOFISH to the current dynamics

Table 1: Preliminary outline of log frame and tentative ToC of a reoriented Programme¹⁶¹

Overall objective		To attain sustainable fisheries management in the EA-SA-IO region within the framework of the African Blue Economy, to safeguard the contribution of fisheries to livelihoods, poverty alleviation, and food and nutrition security for future generations, and to support local socio-economies and climate resilience.		
Specific objective		To enable sustainable management of fisheries resources in member countries supporting national management frameworks and compliance, addressing over-, destructive and IUU fishing, protecting biodiversity and critical habitats, encouraging stock recovery and foster inclusive fisheries value chains.		
Results		OVis	Sources of verification	Risks and assumption
R1	Science-based management and sustainable use of resources of inland fisheries of LV and LT are supported, limiting access, safeguarding critical habitats and restoring stocks.	Lake-wide and country/locally CPUE (catch per unit of effort.	Data from periodic lake wide frame surveys of LV (to be replicated in LT).	Political will and public awareness/support for limiting access and protect critical habitats. Sufficient logistic, budgetary and HR.
	Harmonized and synergized resource management among riparian countries is advocated and support at regional levels, where relevant, effective, and efficient, is fostered.	Monitoring data of catch composition.	Catch and effort data when available.	
	For LV and LT, activities to support the objectives of the reoriented Programme are proposed separately in the tentative log frame included in the Annex to the main report.	Number of infringements detected increased relative to joint MCS efforts.	MCS data.	

¹⁶¹ Activities following the findings, conclusions and recommendations of the Final Report are tentatively proposed in a full log frame included in the Annex to the report. To include a full logical framework here would further increase the volume of the Final Report

R2	Science-based management and sustainable use of resources of marine coastal SSF and artisanal fisheries in Programme member countries are supported, limiting access, safeguarding coastal environs and protecting critical habitats to allow restoring stocks.	Increased CPUE and % tbd, and species diversity.	Catch and effort monitoring data, beach and market surveys.	Political will and public awareness/support for limiting access and protect critical habitats. Sufficient logistic, budgetary and HR. Strong institutional capacities for right based CBFM or co-management of communities and local CAs, or potentials to build such capacities.
	Cooperation at regional levels, where issues and challenges warrant regional collaboration, and efforts are relevant, effective, and efficient for achieving results supported.			
	National and local management frameworks are supported where they exist, including by facilitating enforcing compliance by MCS, and encouraging communities to participate in surveillance. Where such frameworks don't exist or exist only on paper, developing and implementing frameworks is assisted.	Number of infringements detected and their prosecution increased relative to MCS efforts.	CA and CSO reporting, media coverage.	
	CBFM, co-management EAFM and rights-based approaches fostering responsible fishing and implementing the VGSSF are facilitated in a fully participating fashion.	Number tbd of communities empowered and enabled which participate in management increased tbd per country and location.	CA and CSO reporting, media coverage.	
R3	Science-based management and sustainable use of resources of straddling stocks of tuna and tuna like species including of rebuilding stocks are supported.	Trends of overfishing e.g., of yellow fin tuna are arrested.	Media coverage and scientific and development assistance specific reporting.	Political will and public support of member country's governments of the EA-SA-IO region to safeguard shared resources of tuna and tuna like species for future generations. Political will to fulfil internationally binding provisions for the management of straddling stocks including the PSMA, and willingness to apply voluntary instruments as the CCRF, the precautionary principle and IPOAs e.g., on capacity management and IUU fishing. Sufficient logistic, budgetary and HR.
	Harmonization of access conditions including of licensing foreign and DWF vessels is advocated, and regional cooperation and solidarity is encouraged and supported in concert with respective efforts of IOTC.	Harmonization of access conditions is thematized in Programme supported consultations.	Media coverage and scientific and development assistance specific reporting.	
	Capacities for preventing, deterring and eliminating IUU fishing, and to sanction misreporting of catches by cost efficient MCS and regionally shared VMS data management with a regional organisation CAs, or potentials to build such capacities.	Number (tbd) of infringements detected and their prosecution increased relative to MCS efforts.	Idem, IOTC and RFB reporting, national, regional and international media coverage.	
	Resource conservation concepts of e.g., the precautionary principle or of large marine protected areas, especially targeting IUU fishing in "IUU hotspots", is widely and effectively advocated on regional scale.	Resource conservation concepts thematized in supported consultations.	Idem, IOTC and RFB reporting, national, regional and international media coverage.	

R4	Inland and marine SSF and artisanal fisheries management pilot projects and initiatives are supported and their number and logistic and HR means are increased.	Number of projects and degree of participation tbd	CA and CSO reporting, media coverage.	
	A comprehensive and fully participatory survey/ <i>ex post</i> evaluation of existing projects is carried out, identifying selection criteria for additional projects, and projects are selected in consultation with stakeholders including DMROs, RFBs, CAs and other public sector actors and private sector operators and their representative and legitimate socio-professional organizations.	Survey and consultations carried out and result in agreements across the board.	CA and CSO reporting, media coverage, survey and consultation reports.	Fishers, communities, their leadership and VC actors accept access limitations. Political will and CA support to facilitate CBFM and co-management.
	Sustained and comprehensive M&E is developed on the base of the surveys and supported with Programme resources.	M&E guide- and timelines, active two-way communication.	M&E reports validated by stakeholders.	Sufficiently effective CAs and logistic, budgetary and HR.
	Focused efforts of the increasing media coverage by the Programme C&V component are established and sustained.	C&V result available in the public domain.	Media coverage.	

The following box summarizes shortcomings of the present log frames for results 1 and 2, with respect to indicators, sources of verification and assumptions, as a “log frame specific lesson learned”¹⁶².

Box 1 Log frame for results 1 and 2: OVIs, Sources of Verification and Assumptions:

For result 1 and 2, the objectively verifiable indicators (OVIs), sources of verification and assumptions contained in the logical framework are of little help. For the overall objective, assessing the OVI *socio-economic benefits of the regional fisheries sector* is practicably not possible because of the generic, all-encompassing formulation, aggravated by including regional dimensions. The proposed sources of verification refer to national and regional statistics which are, at best to varying degrees, unreliable, and the underlying assumption of *availability of accurate and timely statistics*, can safely be coined a “killer assumption”.

The same applies to the OVIs referring to per capita fish consumption and employment creation, not only in terms their doubtful significance but also regarding the assumptions formulated: the first contradicts *eo ipso* the postulate contained in the specific objective, while the second *development of alternative sustainable livelihoods to absorb redundant fishers* is unrealistic in situations where small scale fishing are predominantly a “last resort economic activity”, as a social safety net.

With respect to results, for result 1 *Enhanced Regional Policies and institutional frameworks to secure more sustainable fisheries management and contribute to marine biodiversity and climate resilience*, the MTE notes that the OVIs provide neither a baseline nor quantified targets, sources of verification consist of internally produced documentation only, and underlying assumptions are made up of improvements the Programme pretends to facilitate. The same applies to OVIs formulated for result 2 *Strengthened capacity to prevent, deter and eliminate IUU fishing in the EA-SA-IO region*, with only one objectively verifiable source of programme-external verification i.e., reports of international and regional organizations. Of the assumptions, again only one i.e., *willingness of judiciary to participate to the training* is outside of the influence of the Programme, and not very realistic as such.

3.3.2. Operational recommendations (to EUD, the Programme TAT, DMROs, and FMBs and RFMOs)

Operational recommendation 1: Programme management and governance structure

The MTE team recommends reviewing the present complex and complicated management and governance structure as part of the effort to make the Programme “leaner”. The present density of committee and technical working groups meetings are challenging the HR capacities of the TAT, IOC and implementing partners alike, aggravated by the highly diversified institutional landscape in which the Programme manoeuvres. Focussing Programme support on sustainable utilization and management of living aquatic resources instead of attempting institutional strengthening of DMROs and FMBs *sensu latu* would be more in line with Programme resources and subject matter expertise.

This recommendation is underpinned by the doubts the MTE team reserves as to whether the Programme, being donor dependent and time bound, has the calibre of leveraging effective collaboration and cooperation with and among DMROs, RFMOs and national CAs and provide for sustainability of respective efforts. Nevertheless, the MTE team recommends that the Programme continues supporting creating conducive conditions for sustainable fisheries and MCS, and contributes, within its means, to improve coordinating and harmonizing regional efforts by DMROs, RFMOs, RFBs and other implementing partners e.g., AU-IBAR. The same recommendation is valid for Programme efforts to address overlaps of mandates and memberships among the DMROs harmonizing national and regional support to sustainable management of marine and inland fisheries.

The MTE particularly recommends improving collaboration with IOTC and SIOFA, the only marine RFMOs in the region with binding powers vis a vis its member states, to combat IUU including by supporting the implementation of the FAO PSMA.

¹⁶² For result 3 only the Action Documents provides a very generic log frame, as mentioned above

Operational recommendation 2: Continue and widen Programme support for Lake Victoria

Regarding LV, the MTE recommends continuing its support to improved frame conditions for management, as capacity building for MCS and supporting repeat lake-wide frame surveys. In addition, the MTE recommends widening the focus of programme support, within the available logistic and HR means and subject matter expertise, by addressing eminent problems as the need to protect tilapia breeding grounds including by reducing sand mining, pollution including plastic pollution and pollution from cage culture and raise awareness of the existential problem, for the lake and connected water bodies and aquatic ecosystems, caused by the release of Chinese silver carp in Uganda.

Should the riparian countries agree, the Programme should support a buy-out scheme to limit access to LV fisheries resources following the suggestions of LVFO outlined above, i.e., piloting a right based management regime giving preferential access (permission to fish) to local fishers and restricting number of vessels owned by fishers.

Operational recommendation 3: Facilitate the implementation of Programme support to sustainable fisheries of Lake Tanganyika (work plan 2)

Regarding LT, the Programme is recommended to take an active role in resolving the present impasse caused by lack of responsiveness of FAO, which stymies the effective and efficient use of funds allocated by the Programme. This recommendation is based on the conclusion of the MTE that it is well within the realm, if not the responsibility, of the Programme to leverage the use of funds allocated according to their intended use with LATAFIMA. Finding a solution, including by changing the constellation of the present LATIFIMA set-up, is conditional for valorising Programme efforts creating conducive conditions for transboundary fisheries management and MCS. Changing the present implementation arrangement may imply changing the service provider if this is feasible without jeopardizing allocation of funds as foreseen.

Even if the implementation arrangement is changed and has become conducive to the valorisation of Programme support, a no-cost extension of the Programme's duration will be required to allow LTA to contract STEs or NKEs to start activities and achieve tangible results. In such case, the MTE recommends appraising pertinence, relevance and feasibility of *inter alia*:

- Encourage an awareness-raising campaign to inform stakeholders of the stock situation and inform them of the Charter to prepare them for the closure of the Lake is necessary.
- Selection, recruitment and training of personnel dedicated to MCS and urgent procurement of the tools needed for MCS operations.
- Launching of a C&V activity necessary to give visibility to both the LTA and the LATAFIMA project (which appears unknown to most), possibly with active support from the TAT C&V component employing media in the languages used by the riparian populations.

Operational recommendation 4: Marine fisheries work plans under work plan 3 and Result 2

With respect to the marine fisheries work plans under results 1 and 2, the MTE recommends following and further operationalizing the differentiation of resource management and MCS of LS industrial fisheries of tuna and tuna like fisheries, and of inland and marine SSF and artisanal fisheries. For the former, and the respective efforts postulated the marine fisheries work plan under result 1 (IOC-PRSP support to marine SSF, see EQ 3), a nexus should be established with the SSF grant projects under result 3, by streamlining efforts to facilitate development of effective management plans, fostering horizontal integration and learning.

Under Result 2, the IOC-RPSP encompasses regional fisheries surveillance operations led by IOC-PRSP with focus on LS industrial fishing of straddling stocks of tuna and tuna like species. The MTE recommends continuing efforts of strengthening MCS capacities, creating conducive legal and regulatory conditions for MCS and by detecting infringements of national legal provisions, and supporting regional resource conservation and management measures (CMM) of the IOTC and SIOFA, and enforce compliance with them. The MTE recommends future joint patrols :

- To be carried out on demand and in coordination with national CAs and complementing national efforts of enforcing compliance with national management frameworks, and legal and regulatory provisions;

- To serve as training exercises for national enforcement efforts which, in case of shared or straddling resources, involving officers from the countries facilitating “learning by doing”;
- Not to refrain from “naming and blaming” repeat and notorious perpetrators, especially in case of grave infringement (fisheries crimes in case legal provisions in areas under national jurisdictions are breached, or, in case of underreporting of catches including in ABNJ, fraud);
- Fisheries infractions, lack of catch reporting and under-reporting to be effectively prosecuted and penalized by the states under the jurisdiction of which they have been committed;
- Publicising IUU fishing cases, making them subject of regional and global media coverage including regarding their prosecution (or non-prosecution), and covering infringing on regional resource conservation and management measures. This would make use of the V&C capacities of the Programme as well as other ways to bring IUU fishing to the attention of the public.

For the IOC-PRSP the MTE recommends the Programme continuing to advocate its institutionalization, with member states pledging sustainable budgetary and logistic support, including the transparent employment of Programme provided grants to national MCS CAs¹⁶³. Regionally harmonized management of straddling stocks cannot be sustainable if only donor driven and financed. It will require concerted political will to enforce compliance with donor independent financing, and transparency and accountability of supplementary external budget support.

The MTE strongly recommends IOC-PRSP efforts to combat IUU fishing to factor in other subregional efforts, in the pipeline with SADC support and planned for the HOA subregion. This recommendation concerns in particular potential overlaps and duplication of efforts of management of surveillance data, especially with respect to reliable or fraudulent reporting of catches and fully respecting best practices of ensuring confidentiality.

Operational recommendation 5: Increase support to grass-root SSF projects in the EA-SA-IO region (work plan 4).

Regarding the grass root level SSF projects allocated grants under result 3, the MTE recommends the Programme to continue supporting the present, and, possibly, more grass root SSF projects in the EA-SA-IO region. This recommendation follows the conclusion that, together with the first joint MCS patrol, the achievements of many of the projects supported to date are the most tangible and visible effects of the Programme, whereas many of the other relevant achievements, as creating conducive conditions for management and MCS, are still to be put to practical use.

The recommendation is also based on the assessment of the MTE supported by a plethora of studies, assessments, and surveys of state and non-state actors at national, regional and global levels, that issues and challenges of coastal and inland fisheries are, with few exceptions, increasing rather than diminishing. The recommendation also encompasses the option to reallocate budgetary provisions saved by making the Programme “leaner” for this purpose. Continuing and extended support should be preceded by a comprehensive and fully participatory survey *ex post* evaluation of existing projects, and a corresponding *ex ante* evaluation of additional projects¹⁶⁴. This effort is expected to result in selection criteria for grant allocation following the OECD/DAC criteria, performance indicators and sustained monitoring developed on the base of the surveys.

The MTE recommendation assumes the existence of a legal and regulatory frameworks, in the host countries, enabling management plans, CBFM and joint MCS in the spirit of the FAO CCRF, EAFM and SSF voluntary guidelines. Where such frameworks do not exist, or exist only on paper, focus of the Programme needs to be on facilitating effective management plans i.e., by marking, registering and regulating fishing effort and reduce effort and pressure on resources using tools as area specific and adaptable management plans including spatial, temporal and gear restrictions with the primary goal of conserving, restoring, and protecting critical habitats to allow stocks to recover. Applying this rationale, MCS would not be the beginning but the end of fisheries resource management.

Another recommendation regarding Programme support to feasible present and future grass root SSF projects is to provide for sufficient (in terms of quality and quantity) “boots on the ground” and adequate logistic and budgetary resources. Long term Programme, ideally, would complement support from

¹⁶³ The MTE team noted the refusal to use funds allocated to the Mozambique CAs for a planned joint patrol but could not identify the reason for the refusal except that Mozambique did not participate in the PRSP RCU meetings that are responsible for the planning regional missions under PRSP

¹⁶⁴ According to the conclusion of the MTE that, while management measures and MCS applied solely “from above” may be an option for MCS of LS and may be the only one for DWF vessels, will fail in inland and marine SSF and artisanal fisheries if it not done participatory, to foster acceptance and ownership of management measures.

national CAs, especially at province/district and local levels, to manage fishing capacity and enforce compliance. Programme support should include constant monitoring, not parachuting in with short term advice, but by building perennial monitoring, backstopping and reporting structures. Where necessary, the Programme, in concert with the relevant DMROs, should mitigate disputes over resources access, or act as honest broker e.g., in case of transboundary issues, of resources access and management.

It is also recommended that Programme support should facilitate sharing past experiences, continuous learning, and exchanging empirical knowledge. However, The MTE discourages building yet another digital regional platform to serve this purpose, because to service such platform would reduce the already limited HR capacity and time available to “boots on the ground” for much needed grass root level work. Instead, a yearly regional meeting, over time sufficient to exchange experiences and lessons learned “face to face”, is recommended, as well as increased focus of the C&V component of the Programme to raise project profiles and to increase chances of multiplication and impact as discussed in 3.2 above.

Table 2: Planned and incurred expenditure and percent of delivery for Result 1

ECOFISH R1: Planning 2021/22 Att. % achieved (indicative)			
Strategic Action	Total Budget €	Committed budget €	Percentage %
1.1 Enhance regional cooperation in the sustainable management of shared resources in the marine fisheries	€ 1 056 923	€ 140 500	13,8 %
1.2: Evaluate and review existing management plans and/or develop and support the implementation of new management plans or species and/or fisheries of regional interest	€ 200.000	€ 117.000	58,5 %
1.3: Promote coherent registrations and licencing frameworks in the small-scale marine fisheries	€ 129.500	€ 6 000	4,6 %
1.4: Strengthen the technical and administrative capacities of RFBS to improve service delivery at the Regional level	€ 331.000	€ 143.500	43,4 %
1.5: Facilitate collaboration with other regional institutions in charge of the natural resources management (e.g., Regional Sea Conventions) and synergies with relevant programmes.	€ 120.000	€ 28.000	23,3 %
1.6: Improve data collection and data management in support of more evidence-based Regional policies.	€ 605.000	€ 168.500	27,9 5
1.7: Map changes in the range of fish species and strengthening the monitoring of fish stocks to determine the impacts of climate change and other associated factors on the resources	€ 610.000	€ 174.000	28,5 5
1.8: Support the adoption and implementation of fisheries management measures aiming at protecting marine biodiversity with regional impacts.	€ 708.800	€ 70.720	10,0 %
TOTAL	€ 6.429.600	€ 848.220	13,19 %