

Friend of the Sea Audit Guidance for the Sustainable Sea Turtle Watching Standard



Friend of the Sea non-Seafood Standard


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1. Introduction

1.1 Friend of the Sea

Founded in 2008, Friend of the Sea (FOS) is a non-governmental organisation that has become the leading certification standard for products and services which respects and protects the marine environment.

The mission of FOS is to safeguard the marine environment and its resources by incentivising a sustainable market and implementing specific conservation projects. The present document is a guideline for auditors that are operating with the FOS standards for sea turtle watching project.

1.2 Purpose of the document

The purpose of this document is to provide guidance on the FOS standards for Certification Bodies (CBs) and auditors, to ensure consistent interpretation and application across Countries and CBs, hence improving the efficiency of the assessment process.

This Audit Guidance document provides this guidance through:

- 1- Description of how to interpret the principles and criteria from the FOS standards;
- 2- Audit instructions to verify compliance through indicators;
- 3- Information relating to exceptional situations;
- 4- Objective criteria for critical limits;
- 5- Instructions to complete the audit report.

A brief explanation is given for each criterion, together with the description of indicators and list of documentation to collect and attach to the report.

1.3 Requirements classification

Requirements are classified as Essential or Recommendations, according to their level of importance.

- **Essential Requirements:** 100% conformity to essential requirements is mandatory in order to be certified. The company has to propose effective corrective actions (declaration of intents and implementation plan), to be submitted to the certification body within three weeks from the issuing of the non-conformity. This proposal shall also include a timetable concerning the implementation of each corrective measure. Each proposed corrective action shall be fully implemented within the following 12 months and verified during the surveillance audit.
- **Recommendations:** Compliance with recommendations is not mandatory for the company to be certified. However, compliance with recommendations will be verified during the audit and any deficiency will be included in the Audit Report as a recommendation. The company shall inform the certification body, during the following audit, regarding any corrective measures implemented.

Requirements which are not applicable to the audited company will be marked with 'N.A.'

2. Description of the company to be audited

This preliminary part of the checklist has to be filled in each field by the auditor, in order to have useful data about the operator.

a) Name of the company under audit
b) Is the company under audit part of a group? If yes, specify the name
c) Address of the company under audit
d) Name, role and contact of the representative(s) of the company under audit accompanying the auditor during the inspection:

e) Sea turtle boat(s) and their registration number, horsepower, people capacity (crew included) and home port

Name of the boat	Registration number	Horsepower (Kw)	People capacity	Home port

f) If the owner of the boat(s) is different from the company, please specify

g) Boat(s) inspected by the auditor

h) Sea turtle species (common and scientific name) normally found in the area where sea turtle watching is carried out and period of the year during which they can be spotted in the area.

Common name	Scientific name	Period

i) Coordinates of the sea turtle target area

j) Number of employees (specify seasonal or permanent employees)

k) Certification and awards
l) Date and type of the audit (initial audit, surveillance audit, recertification audit)
m) Other relevant information

- The Friend of the Sea project has been outlined to the company under audit**
(If not, the auditor shall provide a short description to the company)
- The organization was informed of the opportunity, in case of approval, of using the Friend of the Sea logo in association with its sea turtle watching activity** *(e.g. boats, marketing material and website)*
- The duration of the audit has been agreed upon**
- The information included in the Preliminary Information Form (PIF) has been confirmed as valid** *(in the case of changes to the PIF, an updated version has to be promptly provided).*

Notes to the auditor

- 1)** The auditor shall fill out all fields in the checklist.
- 2)** The Auditor shall provide an explanation when requirements are not applicable.
- 3)** The Auditor shall write YES when the unit of certification complies with a requirement and NO when it does not.
- 4)** The Auditor shall comment and explain the positive or negative answers. Mere "YES," "NO," or "N.A." are not considered as sufficient and additional certification will be requested.
- 5)** Each relevant document shall be added to the final audit report in a separate and numbered attachment.
- 6)** Photographic and videos added to the checklist or attached can represent valid onsite evidence.

3. Audit guidance

According to IUCN Red List, 6 out of 7 species of sea turtles are classified as vulnerable, endangered or critically endangered (for the remaining species data are insufficient). Although several NGO, non-profit associations and individuals promote preservation projects, a responsible tourism can be an effective tool for conservation efforts, because it sensitizes people to adopt appropriate behaviours, educating them about sea turtles threats and their habitat issues, and it is a sustainable source of income for the local economy.

For this reason, Friend of the Sea aims to certify all those activities bringing tourists in contact with sea turtles in full respect of their safety and well-being. The three main tourist experiences that can receive a certification of sustainable sea turtle watching operation are:

- ✓ Swim-with sea turtle experience (snorkelling or scuba diving)
- ✓ Nesting sea turtle watching
- ✓ Hatching sea turtle watching

In this section Friend of the Sea wants to provide the auditors and the operators with a complete explanation of the requirements and how to be in compliance with them in order to certify a sustainable sea turtle watching activity.

3.1 Authorization and permits

Requirement		Level
1.1	Sea turtle watching operations are authorised by a permit granted by the responsible authority, for a given area, where applicable.	Essential

In many countries, just a limited number of permitted (licensed) operators can undertake commercial sea turtle watching activities. This is important to guarantee the sustainable management of these operations, since, ideally, the number of permits available depends on the carrying capacity for a specific area. The carrying capacity of the site is determined by considering the results of ongoing scientific researches on local sea turtle population and the evidence collected from stakeholder groups including tour operators, NGOs, scientists and the public.

The auditor shall collect as a proof of conformity a copy of the permission to practice sea turtle watching operations into a given area. If the national legislation does not provide specific licenses for this kind of operations, the auditor shall collect evidence of compliance with the local nautical standards.

Requirement		Level
1.2	All vessels used in sea turtle watching operations are authorised under the national legislation, where applicable.	Essential

All vessels to be certified, and hence included in the scope of certification, shall be officially registered according to the national system in use. Vessel registrations shall



be requested for all vessels in the scope of certification, not just those inspected by the auditor.

The auditor shall collect as a proof of conformity a copy of the authorisation to navigation for each vessel under audit. This documentation can also be requested remotely during the preliminary audit phase. Incomplete or partially completed vessel registrations and license details are not accepted.

3.2 Boats authorized location and approach

Requirement		Level
2.1	Starting from 20 meters (65 ft) from aggregation sites of sea turtles or as soon as a turtle is sighted, boats shall keep a slow and constant no-wake speed (≤ 5 knots). Chasing sea turtles is not permitted.	Essential

Among the human threats to sea turtles' safety, incautious boat piloting could put in danger sea turtles (Tisdell & Clevo, 2002): they could be subject to damage by power boat strikes, especially if struck by propellers. In facts, boat strikes are one of the main sources of direct mortality of turtles in nearshore habitats worldwide (Denkinger & al, 2013).

For this reason and to minimize the human impact on sea turtles' well-being, when the boat comes in proximity of a sea turtles' aggregation site or when a turtle/(s) is/(are) sighted, a slow and constant no-wake speed shall be maintained, to avoid stressing the animal(s) or any risk of collision. Moreover, it is good sense not to chasing sea turtles in order to reduce their stress and waste of energy, because if they feel threatened, they could be frightened, go away fast and dive.

The auditor shall verify on-board the compliance with the procedure of approaching sea turtles, evaluating if the boats respect the established distances and the crew maintains a proper behaviour.

Requirement		Level
2.2	Boats shall always maintain themselves at a minimum distance from each sea turtle. The minimum distance is 5 meters (16 ft). A shorter distance is prohibited.	Essential

Boating in sea turtle “hot spot” can affect foraging and behavioural patterns having even long-term implications for ecological relationships (Roe, Leader-Williams, & Dalal-Clayton, 1997). In order to reduce boating impact and not to stress or risk injuring sea turtles, boats shall always maintain themselves at the minimum distance of 5 meters from each sea turtle. In this way sea turtles are free to move away in any time without feeling hindered.

The auditor shall verify on-board the compliance with the procedure of approaching sea turtles, evaluating if the boats respect the established distances and the crew maintains a proper behaviour.

Requirement		Level
2.3	The boats shall not intentionally approach sea turtles while mating nor sea turtles which appear to be avoiding boats.	Essential

In order to avoid disturbing sea turtles when they are less prone to be approached the boats shall not intentionally approach sea turtles during a crucial event such as mating nor approach those turtles that appear clearly to be avoiding boats.

The auditor shall verify on-board the compliance with the procedure of approaching sea turtles, evaluating if the boats respect the established distances and the crew maintains a proper behaviour.

Requirement		Level
2.4	Engines shall be placed in neutral when tour participants are getting into the water and coming back on the boat.	Essential

In respect of tour participants and animal safety, engines shall be placed in neutral when tourists are getting into the water and are coming back on the boat.

The auditor shall verify on-board the compliance with the procedure of approaching sea turtles, evaluating if the boats respect the established distances and the crew maintains a proper behaviour.

Requirement		Level
2.5	The crew is aware of the position of the sea turtles at any time, in order to avoid collisions.	Essential

To complete the previous Requirements 2.1 and 2.2 about the risks of injury to sea turtles due to boats, it is important that the crew is always aware of the position of each sea turtle at any time, in order to avoid collisions. It is important to remember that sea turtles are slow swimmers and require frequent surfacing to breathe, for this reason they are more vulnerable to fatal injuries by impact with boats (Peniè, Lozano, & Slater, 2015).

The auditor shall verify on-board the compliance with the procedure of approaching sea turtles, evaluating if the boats respect the established distances and the crew maintains a proper behaviour.

3.3 Swim-with sea turtles

Requirement		Level
3.1	The boat(s) must be at least 5 m (16 ft) away from sea turtle(s) to let tour participants get into the water and swim with them. A shorter distance is prohibited.	Essential

As already explained in the Requirement 2.2, a minimum distance of the boat from each turtle is necessary to avoid both stressing and even injuring the sea turtles.

The auditor shall verify on-board the compliance with the procedure of approaching sea turtles, evaluating if the boats respect the established distances and the crew and tour participants maintain a proper behaviour.

Requirement		Level
3.2	Tour participants must enter the water in a gentle way, trying to reduce the noise to a minimum. Jumping into the water is not recommended.	Essential

Sadly, it has been observed that in-water turtle watching activities can impact negatively on sea turtle survival, because of human disturbance (Whaling, 2017). In particular an excessive disturbance from divers and snorkelers could hinder sea turtles from a successful foraging (Landry & Taggart, 2010). For this reason, it is important to educate tour participant maintain an appropriate behaviour when they swim with sea turtles, in order to minimize their impact and maybe prolong the time of watching. When they enter the water, they shall be gentle avoiding jumping into the water and they shall reduce noises at a minimum.

The auditor shall verify on-board the compliance with the procedure of approaching sea turtles, evaluating if the tour participants maintain a proper behaviour.

Requirement		Level
3.3	Tour participants shall swim gently: if they are snorkelling, they have to keep their fins under the top of the surface while swimming, in order to reduce the noise. They also should avoid talking or at least reduce the volume of their voice.	Essential

In order to minimize the impact of the swimming activity and maybe to prolong the time of sea turtle watching, once in the water, tour participant shall swim gently to avoid producing noise. When snorkelling, they shall reduce splashes of water by swimming keeping fins under the surface of water.

The auditor shall verify on-board the compliance with the procedure of approaching sea turtles, evaluating if the tour participants maintain a proper behaviour when they swim with turtles.

Requirement		Level
3.4	Approach sea turtle only from the side, not from ahead or from the rear.	Essential

When tour participants swim with sea turtles, they must respect the animals, avoiding swimming in front or back the animals: in facts, this behaviour could frighten the turtles. In addition to what explained in the previous requirements, if the turtles feel threatened by the presence of tourists, they become less interested in foraging in an attempt to avoid the area and this behavioural change could hinder long term

species conservation goals (Slater, 2014) (Peniè, Lozano, & Slater, 2015). For this reason, tourists shall not approach sea turtles from the rear or from the head but only from the side.

The auditor shall verify on-board the compliance with the procedure of approaching sea turtles, evaluating if the tour participants maintain a proper behaviour when they swim with turtles.

Requirement		Level
3.5	Do not swim directly above the turtle.	Essential

This is a crucial requirement in continuity with the Requirement 3.4. It is strictly forbidden to swim directly above the sea turtles because a disturbance of this kind could have seriously negative consequences for the animals, inducing a decreasing time of surfacing to breath. As a consequence, this altered behaviour could produce pulmonary damages or hypoxia in the animals.

The auditor shall verify on-board the compliance with the procedure of approaching sea turtles, evaluating if the tour participants maintain a proper behaviour when they swim with turtles.

Requirement		Level
3.6	Do not touch sea turtles.	Essential

It is forbidden to touch sea turtles during the swim-with activities and several reasons support this requirement: first of all such an intrusive approach could stress and frighten the sea turtles reducing their time of foraging or surfacing to breath, secondly it will reduce the time of interaction with the animals, finally it is possible to facilitate the spreading of pathogens by touching wild animals.

The auditor shall verify on-board the compliance with the procedure of approaching sea turtles, evaluating if the tour participants maintain a proper behaviour when they swim with turtles.

Requirement		Level
3.7	Always keep a minimum distance of 2 m (6 ft) from sea turtles. This also includes selfie stick. If a sea turtle swims towards a tour participant, he/she has to stay calm and move so as not to hinder its path.	Essential

In order to preserve the animal well-being, it is important to maintain a minimum distance of 2 m from each sea turtle during a swim-with activity. This minimum distance includes selfie sticks and any other device/tool/item too. It is possible that the sea turtle swims toward a tour participant. In that case, he/she has to stay quiet avoiding sudden movements or noises and slowly move in order to clear the passage to the animal.

The auditor shall verify on-board the compliance with the procedure of approaching sea turtles, evaluating if the tour participants maintain a proper behaviour when they swim with turtles.

Requirement		Level
3.8	Do not use the flash while taking pictures of sea turtle.	Essential

It is forbidden to take picture by using the camera flash because it could stress and scare sea turtles, reducing the time of interaction too.

The auditor shall verify on-board the compliance with the procedure of approaching sea turtles, evaluating if the tour participants maintain a proper behaviour when they swim with turtles.

Requirement		Level
3.9	The maximum number of people interacting with a sea turtle is 8 plus a trained guide.	Essential

As the common sense suggests, more tourists around a turtle mean more stress for the animal: in fact, it is logic to guess that the sea turtle could feel surrounded and threatened by the presence of many people. For this reason, Friend of the Sea recommend, wherever it is possible, to reduce at the minimum the number of people interacting with each sea turtle, with a maximum of eight tour participants plus a trained guide interacting with a sea turtle.

The auditor shall verify on-board the compliance with the procedure of approaching sea turtles, evaluating if the number of tour participants interacting with a sea turtle is up to standard.

Requirement		Level
3.10	The interaction time in water with each turtle must last a maximum of 5 minutes.	Essential

In order to reduce the stress for the animal, the interaction time in water with each sea turtle must last a maximum of 5 minutes, always in the respect of the minimum distance and keeping an appropriate behaviour.

The auditor shall verify on-board the compliance with the procedure of approaching sea turtles, evaluating if the tour participants maintain a proper behaviour when they swim with turtles.

Requirement		Level
3.11	It's forbidden to use scooter or jet ski.	Essential

As already explained in the Requirement 2.1, boat strikes are one of the main sources of direct mortality of turtles in nearshore habitats worldwide (Denkinger & al, 2013). Water scooter and jet ski are even more dangerous since they are very fast and could injury, sometimes lethally, sea turtles surfacing in the water to breath. For this reason, it is strictly forbidden to use scooter or jet ski in a sea turtle “hot spot”. The auditor shall verify on-board the compliance with the procedure of approaching sea turtles.

Requirement		Level
3.12	Snorkelling/diving guides shall follow a training course about how to interact with sea turtles into the water.	Essential

In order to provide accurate information to tour participants, the snorkelling/diving guides must follow training programs on the biology and behaviour of sea turtles and about how interact with these animals into the water.

The auditor shall collect any evidence of training, workshop or course organised by the company to train all staff involved in the swim-with sea turtle operations. To verify this requirement, the auditors shall evaluate the content of training/workshop/courses and may interview the guides to verify their competency and they shall collect as an evidence of conformity certificates of attendance of the guides.

3.4 Nesting

Nesting is both an easily accessible and vulnerable step of a sea turtle’s life cycle; therefore, if unregulated, turtle nest viewing can result in decreased reproductive success (Choi & Eckert, 2009). In order to encourage a sustainable activity of nesting watching, Friend of the Sea drew up the following requirements that must be applied by the companies aiming to be certified of sustainable nesting watching.

Requirement		Level
4.1	Keep a distance of at least 5 meters (16 ft) from each sea turtle.	Essential

Disturbance to nesting females has been demonstrated to reduce the reproductive success because avoidance behaviours grow the energy cost (Schofield & al., 2015). If many tourists occupy the beach in order to watch nesting turtles, disturbed females have been reported to emerge and return to the water without nesting (Gerigny, Delaugerre, & Cesarini, 2016), selecting a less-preferred beaches to lay their eggs, leaving them exposed to the tide or to predators, or even release their eggs at sea.

For all these reasons, it is important to minimize the impact of the human presence on the beach selected from the nesting female. Tourists must adopt an appropriate behaviour not to compromise the nesting time. It is important that tour participants maintain a distance of at least 5 meters from each nesting sea turtle.

The auditor shall verify the compliance with the procedure of nesting sea turtles watching activities, evaluating if the tour participants respect the minimum distance from the animals.

Requirement		Level
4.2	Do not obstacle the path of sea turtle. Stay in front of the animal is always forbidden.	Essential

To minimize the impact of human presence on the beach selected by nesting turtles, it is important not to hinder the passage of the sea turtle from the sea to the beach and contrariwise. Therefore, it is forbidden to stay in front of the nesting animal.

The auditor shall verify the compliance with the procedure of nesting sea turtles watching activities, evaluating if the tour participants clear the passage to the animals.

Requirement		Level
4.3	Don't use flash while taking a picture.	Essential

Since taking pictures to the nesting turtles using the camera flash could scare them, it is strictly forbidden to use it.

The auditor shall verify the compliance with the procedure of nesting sea turtles watching activities, evaluating if the tour participants adopt a proper behaviour.

Requirement		Level
4.4	Do not point light on the turtle, especially on its face. The use of lights must be reduced as much as possible. Only the use of red light is allowed.	Essential

It has been observed that the presence of artificial lighting on beaches can prevent females from finding an adequate nesting site and returning to the sea after a nesting

event (Lake & Eckert, 2008). For this reason, it is firmly forbidden to point light on the nesting turtles, especially on their faces. Only red light is allowed, because sea turtles apparently do not see red light as well as humans do.

The auditor shall verify the compliance with the procedure of nesting sea turtles watching activities, evaluating if the tour participants adopt a proper behaviour.

Requirement		Level
4.5	Reduce the noise as much as possible.	Essential

As good sense suggests, loud noises can disturb the nesting females, for this reason it is important to remain calm and silent throughout all the process of nesting.

The auditor shall verify the compliance with the procedure of nesting sea turtles watching activities, evaluating if the tour participants adopt a proper behaviour.

Requirement		Level
4.6	Don't touch the sea turtle.	Essential

In addition to the Requirement 4.1 about the minimum distance to respect, this requirement specifies that it is firmly forbidden to touch nesting sea turtles, even using sticks or whatever. A physical contact with the nesting animal can compromise the reproductive outcome of the sea turtle.

The auditor shall verify the compliance with the procedure of nesting sea turtles watching activities, evaluating if the tour participants adopt a proper behaviour.

Requirement		Level
4.7	Inform the competent authorities of the place where the eggs are laid.	Essential

The company shall inform the competent authorities of the place where the eggs are laid. In this way it will be possible to monitor and protect eggs from predators or human activities until hatching.

The auditor shall verify the compliance with the procedure of nesting sea turtles watching activities, evaluating if the company promptly reports the presence of the turtle nest on the beach.

Requirement		Level
4.8	Guides shall follow a training course about how to interact with sea turtles while nesting.	Essential

In order to provide accurate information to tour participants, the nesting sea turtle watching guides must follow training programs on the biology and behaviour of sea turtles and about how to behave in the presence of a nesting turtle.

The auditor shall collect any evidence of training, workshop or course organised by the company to train all staff involved in the nesting sea turtle watching operations. To verify this requirement, the auditors shall evaluate the content of training/workshop/courses and may interview the guides to verify their competency and they shall collect as an evidence of conformity certificates of attendance of the guides.

3.5 Hatching

As nesting, hatching is another easily accessible and vulnerable step of a sea turtle’s life cycle that could be affected by the human presence; therefore, if unregulated, turtle hatching watching activities can result in decreased reproductive success for the species. In fact, hatchlings can be disoriented from artificial lights or a large tourist presence while entering in the sea, largely rising the risk of predation and energy overuse (Tisdell & Wilson, 2003).

For this reason, Friend of the Sea drew up the following requirements aiming to encourage a sustainable watching activity of sea turtles’ hatching. Thus, in the case the company arrange activities to watch the hatching of the sea turtles, the following requirements must be applied:

Requirement		Level
5.1	Keep a distance of at least 5 meters (16 ft) from sea turtle(s). Pay attention on where you step.	Essential

It is important to minimize the impact of the human presence on the beaches where sea turtle eggs hatch. Tourists must adopt an appropriate behaviour not to compromise the hatching time. It is important that tour participants maintain a distance of at least 5 meters from each hatchling, paying particular attention on where they step.

The auditor shall verify the compliance with the procedure of watching activities of hatching sea turtles, evaluating if the tour participants respect the minimum distance from the animals.

Requirement		Level
5.2	Do not obstacle the path of sea turtles.	Essential

To minimize the impact of human presence on the beaches where sea turtle eggs hatch, it is important not to hinder the passage of the hatchlings from the beach to the sea. Therefore, it is forbidden to obstacle in any way the path of sea turtles.

The auditor shall verify the compliance with the procedure of watching activities of hatching sea turtles, evaluating if the tour participants clear the passage to the animals.

Requirement		Level
5.3	Don't use flash while taking a picture.	Essential

Since taking pictures to the hatchlings using the camera flash could scare them, it is strictly forbidden to use it.

The auditor shall verify the compliance with the procedure of watching activities of hatching sea turtles, evaluating if the tour participants adopt a proper behaviour.

Requirement		Level
5.4	The use of lights must be reduced as much as possible, in order to do not distract the sea turtles. Only the use of red light is allowed.	Essential

Hatchlings rely almost exclusively on brightness cues (i.e. from the moon) to locate the sea after emergence. Artificial lighting can compromise the hatchlings' capacity to orientate in direction of the sea, resulting in it crawling in circles or away from the

ocean. This disorientation may cause a hatchling to wander without a clear path, ultimately becoming fatigued and dehydrated, exposing them to predators and depleting their energy reserves, which are vital for the initial offshore swimming frenzy (Robertson, Booth, & Limpus, 2016). For this reason, it is firmly forbidden to point light on the hatchlings, especially on their faces. Only red light is allowed, because sea turtles apparently do not see red light as well as humans do.

The auditor shall verify the compliance with the procedure of watching activities of hatching sea turtles, evaluating if the tour participants adopt a proper behaviour.

Requirement		Level
5.5	<p>Don't touch or handle sea turtles. This is allowed only if they seem to be confused or disoriented, in order to allow them to go in the right direction (to the sea). In this case, only professionals should handle them.</p> <p>If handled, baby sea turtles have to be posed at least 10 meters (33 ft) from the sea.</p>	Essential

In addition to the Requirement 5.1 about the minimum distance to respect, this requirement specifies that it is firmly forbidden to touch hatching sea turtles, even using sticks or whatever. In case of hatchlings confused or disoriented, only professionals are allowed to handle them in order to give them the right direction to the sea. Baby sea turtles have to walk at least 10 meters on land for the imprinting process.

The auditor shall verify the compliance with the procedure of nesting sea turtles watching activities, evaluating if the tour participants adopt a proper behaviour.

Requirement		Level
5.6	<p>The company doesn't have to alter the natural hatching of the baby sea turtles.</p> <p>Exceptions are allowed only if necessary and have to be conducted by professionals.</p>	Essential

It is strictly forbidden to hinder in any way the natural hatching of the baby sea turtles: hatchlings must not to be blocked, restrained or collected for touristic amusement. Some restricted exceptions are allowed to professionals, only if they have to direct disoriented hatchlings to the sea.

Requirement		Level
5.7	<p>Guides shall follow a training course about how to interact with baby sea turtles while hatching.</p>	Essential

In order to provide accurate information to tour participants, the hatching sea turtle watching guides must follow training programs on the biology and behaviour of sea turtles and about how to behave in the presence of a hatchlings.

The auditor shall collect any evidence of training, workshop or course organised by the company to train all staff involved in the hatching sea turtle watching operations. To verify this requirement, the auditors shall evaluate the content of training/workshop/courses and may interview the guides to verify their competency and they shall collect as an evidence of conformity certificates of attendance of the guides.

3.6 Interactions with sea turtles

Requirement		Level
6.1	Feeding sea turtles and/or other animals is forbidden.	Essential

In every kind of interaction with sea turtles, both in water or on the beach, it is firmly forbidden to feed sea turtles or other animals, in order to minimize the human impact on the wildlife. In fact, sea turtle provisioning by guides or tourists can alter the behaviour of sea turtles around humans, such as attracting them to boats, exposing them to a higher risk of boat strikes and associated disturbance. Moreover turtle-feeding activities badly impact on the overall health of the sea turtles, that use less energy for foraging, resulting in obesity and dehydration and increasing the risks for liver, gout or heart diseases (Stewart, et al., 2016).

The auditor shall verify the compliance with the procedure of sea turtles watching activities, evaluating if the tour participants adopt a proper behaviour.

Requirement		Level
6.2	Accurate information is provided to tour participants on how to behave when sea turtles are sighted.	Essential

The guides to the sea turtle watching activities shall provide accurate information to tour participants in order to teach them how when a sea turtle is sighted.

To collect evidence of this, the auditor shall verify if during the guided tour participants are informed about the standard behaviours to adopt in the presence of sea turtles.

Requirement		Level
6.3	Accurate information is provided to tour participants about environmental issues related to sea turtles and the marine habitat and how everybody can contribute to reduce the impact.	Essential

In connection with the previous Requirement 6.2, the operators should sensitize tour participants to the importance of concerning the marine ecosystems to preserve the sea turtles' well-being and survival. Tourists need to be aware of the threats that put at risk the existence of sea turtles, knowing that most of the species are classified as vulnerable/endangered/critically endangered. The guides shall explain to the tour participants how everybody can contribute to reduce the negative impact on sea turtles' life.

The auditor shall verify the compliance with the proper procedure of approaching sea turtles, evaluating if the guides provide accurate information to tour participants about the importance of preserving the marine ecosystems and how everyone can positively impact on the marine conservation.

Requirement		Level
6.4	Training programs for operators and crew on the biology and behaviour of target species and on responsible sea turtle watching operations are carried out.	Essential

In order to adequately train the staff and to provide accurate information to tour participants, the operators and crew must follow training programs on the biology and behaviour of target species and on responsible sea turtles watching operations.



The auditor shall collect any evidence of training, workshop or course organised by the company to train all staff involved in the sea turtle watching operations. To verify this requirement, the auditors shall evaluate the content of training/workshop/courses and may interview the operators and crew to verify their competency and they shall collect as an evidence of conformity certificates of attendance of the operators and crew.

3.7 Waste management

Requirement		Level
7.1	The company recycles all waste when recycling option is provided locally. In alternative, it appropriately disposes waste.	Essential

The auditor shall review protocols and procedures for recycling, reusing, reprocessing all materials used on-board during the tour and at landing port and describe them briefly. Moreover, they shall evaluate, for example, the presence of recycling bins.

Requirement		Level
7.2	The company implements measures to prevent dispersion of waste at sea (including fuels, lubricants and plastic materials).	Essential

The auditor shall review protocols and procedures in place for preventing the dispersion of waste at sea and describe them briefly.

Requirement		Level
7.3	The company uses non-toxic alternatives available in order to avoid the use of toxic, persistent or bio-accumulating substances.	Recommendation

The auditor shall verify and report on evidence that the unit of certification actively

seeks to replace toxic, persistent and bio-accumulating chemicals with non-toxic alternatives, for example for anti-fouling purposes. Policy, procedures and a list of chemicals on board shall be reviewed.

Requirement		Level
7.4	The company does not use CFC, HCFC, HFC or other refrigerants that cause ozone depletion.	Essential

The auditor shall verify and report on evidence that the unit of certification does not use CFC, HCFC, HFC or other refrigerants that cause ozone depletion.

Requirement		Level
7.5	If spotted, crew must collect floating fishing gear and equipment lost from other boats.	Recommendation

The auditor shall verify and report on evidence that in case of spotting of floating fishing and equipment lost from other boats the crew act properly, collecting them.

Requirement		Level
7.5.1	All material collected shall be properly disposed of at port. If appropriate disposal facilities are not available, the company shall endeavour to work with port operators to provide adequate, affordable and accessible disposal facilities.	Recommendation

The auditor shall collect evidence about the procedure used by the unit of certification regarding how they dispose of the gear and all collected material at port.

If a procedure is not in place, the auditor shall suggest the unit of certification endeavour to work with port operators to provide adequate, low-cost and accessible disposal facilities.

Requirement		Level
7.5.2	In the case a sea turtle is entangled in a discarded fishing gear, follow the instructions at the following link: https://oliveridleyproject.org/wp-content/uploads/2019/07/ORP-Turtle-Entanglement-Protocol Brochure.pdf	Recommendation

The auditor shall collect evidence about the procedure used by the unit of certification regarding how they dispose of the gear and all collected material at port. The rescue operation should be done by a trained guide.

Requirement		Level
7.5.3	Where applicable, the company shall work with ports to implement gear collection and/or recycling programs for end-of-life gear.	Recommendation

Where applicable, the auditor shall suggest the unit of certification about working with ports to implement gear collection and/or recycling programs for end-of-life gear.

Requirement		Level
7.6	The company does not hold or handle mono-use plastic (e.g.: drinks plastic bottles; straws; cutlery; plates, etc.) on the boat(s).	Essential

This is a crucial requirement to perform a sustainable sea turtle watching operation, in order to reduce the polluting impact of the tour that could negatively impact not only on the turtles but also on the entire marine ecosystem.

The auditor shall verify the lack of onboard mono-use plastic through an onsite inspection and he shall review received invoices.

3.8 Energy management

4 Requirement		Level
8.1	The company shall keep a file of energy consumed per use and type of sources (e.g.: gasoline, solar, other), updated at least once a year.	Recommendation

The auditor shall verify and report evidence that the unit of certification keeps records of all energy sources (e.g. fossil fuels, solar, wind or hydroelectric energy, etc) and consumption.

These records shall include, as a minimum, the following parameters:

- Energy sources used (type, renewable or not);
- Energy consumption rate per process line (fishing, processing, and transport).

Requirement		Level
8.2	The company shall set yearly objectives to improve its energy efficiency.	Recommendation

The auditor shall verify and report evidence that the unit of certification regularly calculates its carbon footprint per product unit and is actively engaged in reducing it every year.

3.9 Energy management

The requirements included in this section of the FOS Wild Standard are applicable to all the crew operating on board the vessels supplying the unit of certification. If the review of written documentation is not possible for all requirements, the auditor can assess compliance of these requirements through staff interviews and observations of activities.

Requirement		Level
9.1	The company shall comply with the following requirements:	
9.1.1	Compliance with International Labour Organization and National Laws on child labour.	Essential

The Minimum Age Convention 1973 (No. 138) establishes the age at which children can legally be employed or otherwise work (Table 1). For the purpose of this standard, a child is defined as any person under 15 years of age. A higher age would apply if the national minimum age law stipulates a higher age for work or mandatory schooling. According to the exceptions made in ILO Convention No. 138 for developing countries, if the country permits, the minimum age may be 14 years.

Table 1. The main ILO’s Convention concerning the minimum age of admission to employment and work.

Items	The minimum age at which children can start work	Possible exceptions for developing countries
Hazardous work ¹	18 (16 under strict conditions)	18 (16 under strict conditions)
Basic Minimum Age ²	15	14

Light work ³	13–15	12–14
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1. **Hazardous work:** Any work which is likely to jeopardize children’s physical, mental or moral health, safety or morals should not be done by anyone under the age of 18.
2. **Basic Minimum Age:** The minimum age for work should not be below the age for finishing compulsory schooling and in any case not less than 15.
3. **Light work:** Children between the ages of 13 and 15 years old may do light work, as long as it does not threaten their health and safety or hinder their education or vocational orientation and training.

(Adapted from ILO: <https://www.ilo.org/ipec/facts/ILOconventionsonchildlabour/lang--en/index.htm>).

The auditor shall ask the unit of certification to review copies of the official identification of all the employees, showing date of birth to assess compliance to this requirement. In addition, the auditor shall collect evidence that hazardous work is not performed by staff below age 18. This includes heavy lifting disproportionate to their size, operating heavy machinery, working night shifts and exposure to any toxic chemicals.

Requirement		Level
9.1	The company shall comply with the following requirements:	
9.1.2	Pay the employees adequate salaries compliant at least with the minimum legal wages.	Essential

1. **Wages:** remuneration or earnings, however designated or calculated, capable of being expressed in terms of money and fixed by mutual agreement or by national laws or regulations, which are payable in virtue of a written or unwritten contract of employment by an employer to an employed person for work done or to be done or for services rendered or to be rendered (ILO: Protection of Wages Convention, 1949 – No. 95).

The auditor shall ask the unit of certification to review copies of employees’ contracts, wage records, working hours and pay slips signed by workers to assess full compliance. If the unit of certification is not in possession of legal documents that show the minimum wages of the countries in which it operates, the auditor shall gain this information independently and verify that employees are paid at least the minimum wage. This applies also to seasonal/casual workers and foreign crew of vessels fishing outside territorial water. The auditor shall also make sure that the unit of certification is aware of the minimum wages of the countries in which it operates.

More information about ILO standards on wages are available at: <https://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/wages/lang--en/index.htm>

Requirement		Level
9.1	The company shall comply with the following requirements:	
9.1.3	Grant employees’ access to health care.	Essential

1. **Health:** in relation to work, it indicates not merely the absence of disease or infirmity; it also includes the physical and mental elements affecting health which are directly related to safety and hygiene at work (ILO: Occupational Safety and Health Convention, 1981 – No. 155).

The unit of certification shall have workers’ compensation insurance to cover their employees when an illness or injury happens at work. The auditor shall verify that the unit of certification provides, where necessary, measures to deal with emergencies and accidents, including adequate first-aid arrangements. In the case of a job-related accident or injury, if the workers’ compensation insurance does not cover all the costs of treatment of employees, the unit of certification shall be aware that it must be responsible for that cost. Evidence may be employee insurance

covering work-related medical expenses.

More information about ILO standards on healthcare are available at:
<https://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/occupational-safety-and-health/lang--en/index.htm>

Requirement		Level
9.1	The company shall comply with the following requirements:	
9.1.4	Apply safety measures required by the law. Nonetheless, compliance with the minimum safety requirements are mandatory, even if not required by local law.	Essential

The auditor shall verify what the local occupational safety regulation requires and collect evidence that the unit of certification respects all mandatory safety measures. If a national health and safety standard does not exist in the countries where the unit of certification operates, or if it does not meet the minimum safety requirements, the auditor shall verify and collect evidence that:

- Hazards and risks in the work environment are minimised;
- There are not immediate dangers to life;
- Safe drinking water is provided to all workers;
- Health and safety training is provided to all workers;
- Personal Protective Equipment (PPE) is provided for all workers.

More information about ILO standards on occupational safety and health are available at

<http://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/occupational-safety-and-health/lang--en/index.htm>

Requirement		Level
9.1	The company shall comply with the following requirements:	
9.1.5	Keep records of accidents or injuries.	Recommendation

The auditor shall review records of accidents or injuries to workers. In order to avoid future occurrences, these records shall be used for the elaboration and/or constant improvement of a work safety plan for the unit of certification.

Requirement		Level
9.1	The company shall comply with the following requirements:	
9.1.6	No forced or compulsory labor.	Essential

1. **Forced or compulsory labour:** all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily (ILO: Forced Labour Convention, 1930 – No. 29).

All work, including overtime, must be voluntary. The hours worked in excess of the normal working hours must be remunerated at the rates prevailing in the case of overtime for voluntary labour. The wages shall be paid to each worker individually. The auditor shall verify if work contracts are clearly articulated and understood by workers. During the interviews and on-site observations, the auditor shall ensure that the unit of certification does not retain any passports or other identity documents.

More information about ILO standards on forced or compulsory labour are available at: <https://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/forced-labour/lang--en/index.htm>

Requirement		Level
9.1	The company shall comply with the following requirements:	
9.1.7	No discrimination.	Essential

1. **Discrimination:** (a) any distinction, exclusion or preference made on the basis of race, colour, sex, religion, political opinion, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation; (b) such other distinction, exclusion or preference which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation as may be determined by the Member concerned after consultation with representative employers' and workers' organisations, where such exist, and with other appropriate bodies (ILO: Discrimination (Employment and Occupation) Convention, 1958 – No. 111).

Opportunities for recruitment, access to training, promotion, compensation, termination and retirement shall not be made based on race, colour, sex, religion, political opinion, national extraction or social origin. Physical, verbal or sexual abuse, bullying or harassment are prohibited. The unit of certification must have an official anti-discrimination policy, which outlines its procedures and practices. During the interviews and on-site observations, the auditor shall ensure that discrimination does not occur at the unit of certification.

More information about ILO standards on discrimination are available at <https://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/equality-of-opportunity-and-treatment/lang--en/index.htm>

Requirement		Level
9.1	The company shall comply with the following requirements:	
9.1.8	Rights on board. Only applicable to safari boat tour.	Essential

Accommodation shall be maintained in a clean and habitable condition and shall be kept free of goods and stores that are not the personal property of the occupants or for their safety or rescue. Galley and food storage facilities shall be maintained in a hygienic condition. In addition, the fishermen's working hours must be managed respecting aspects of safety and health, including prevention of fatigue. Therefore, the auditor shall verify if the vessels are maintained in a clean and habitable condition and check if regular periods of rest of sufficient length are given to fishers.

More information about ILO standards on rights on board are available at www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C188

Please refer also to the Maritime labour convention (MLC): <https://seafarersrights.org/seafarers-subjects/maritime-labour-convention-mlc/>

3.10 Energy management

4 Requirement		Level
10.1	The company introduce to all its tour participants Friend of the Sea Sustainable Sea Turtle Watching project.	Essential

The auditor shall verify if the operators introduce tour participants to Friend of the Sea Sustainable Sea Turtle Watching project. Friend of the Sea shall provide a standard speech to the operators in order to facilitate the presentation of the project.

Requirement		Level
10.2	In order to continuously improve, the company shall recommend all its tour participants to report Friend of the Sea (https://friendofthesea.org/contact-us/), in case they perceive that the company does not comply with some of these requirements.	Essential

The auditor shall verify if the operators invite tour participants to express their opinion about the sea turtle watching operation in the feedback form available on the Friend of the Sea website.

3.11 Other recommendations

4. Requirement		Level
11.1	The company promotes the undertaking of an assessment of size, distribution and other characteristics of the target sea turtles' population, in order to also assess potential impact of sea turtle watching.	Recommendation

In order to assess the potential impact of sea turtle watching activities in a selected site, it is important to regularly monitor the size, distribution and other characteristics of the sea turtle target population. In absence of other sources of stress or threat for the turtles, a sustainable activity of sea turtle watching should not impact on the balance of the population. The company shall involve a marine biologist or a comparable figure with a specific training background in the turtles' field, in order to perform these evaluations.

The auditor shall evaluate if the company effectively promotes research projects focused on the local sea turtles' population.

Requirement		Level
11.2	The company cooperates with universities, research groups and NGOs, providing data on local sea turtles.	Recommendation

The cooperation between the company and the academic/scientific groups gives added value to the sea turtle watching operations, because, beside the enjoyment of the tour participants, these activities can provide useful data about local sea turtle

distribution and health state. For this reason, the company is highly recommended to cooperate with university, research groups and NGOs.

The auditor shall verify if the company effectively cooperates with academic and not research groups.

Requirement		Level
11.3	At least one marine or natural sciences biologist is part of the company's team.	Recommendation

The operators who guide tour participants during the sea turtle watching tour should be competent to provide scientifically reliable information. For this reason, at least one marine or natural sciences biologist should be part of the company's team.

The auditor shall evaluate the operators' CV, that must be attached to the audit report.

Requirement		Level
11.4	The company is carrying on citizen science project(s). Data collected is shared with universities, and/or research groups, and/or NGOs that are working on local sea turtles' populations.	Recommendation

In reference to the Requirement 11.2, the company can involve tour participants in the data collection activity, promoting virtuous citizen science projects.

The auditor shall evaluate the existence of such a project, describing it in the audit.

Requirement		Level
11.5	The company keeps a logbook with sightings of wounded sea turtles, and it shares the information with the competent authority.	Recommendation

The auditor shall verify the presence of a logbook with sightings of wounded sea turtles. The company must share these data with the competent authority.

Requirement		Level
11.6	Where applicable, the company uses ducted propellers.	Recommendation

The auditor shall collect evidence of conformity.

Requirement		Level
11.7	The use of boats without engine is encouraged, where applicable.	Recommendation

The auditor shall verify if the company uses for example kayaks, sail boats, etc. The use of boats without engine reduce the risk of potentially lethal injuries for sea turtles.

Requirement		Level
11.8	It is requested to use only sustainable sunscreen cream, where applicable.	Recommendation

For further information regarding sustainable sunscreen refer to: <https://friendofthesea.org/sustainable-standards-and-certifications/sustainable-omega-3-oil-and-uv-creams/>

4. Conclusions

In the last part of the audit report the auditor is requested to flag if the company complies or if does not comply with the requirements of sustainability.

The auditor can flag the first option only if there are no essential non-conformities open. Failure to comply with the requirements classified as “Recommendations” does not preclude the certification of the company under audit.

The audit can flag the second option only if the company was not able to get in compliance with all the essential requirements. In this case, the auditor shall report why the company did not pass the audit.

In any case, the auditor shall list all the non-conformities detected during the audit, and specify if they have been solved or not (especially with regards to the Essential non-conformities)

“The Auditor shall fill out the following fields:

- The company COMPLIES with Sustainable Sea Turtle Watching requirements**

- The company DOES NOT COMPLY with Sustainable Sea Turtle Watching requirements**

ESSENTIAL NON-CONFORMITIES (corrective plan to be produced within 3 weeks and correction within 1 year)

List of essential Non-conformities

RECOMMENDATIONS (to be communicated within the next inspection)

List of recommendations

Once the audit report is closed, the auditor has up to 10 working days to send it to Friend of the Sea, which will issue the related certificate to the company.

5. References

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Whaling, M. (2017). HOW TOS FOR TURTLE TOURISM: A REVIEW OF SEA TURTLE TOURISM, ITS IMPACTS, AND GUIDELINES TO INFORM STAKEHOLDERS IN MARTINIQUE. *Nicholas School of the Environment, Duke University*.