

# Friend of the Sea Audit Guidance for Sustainable Diving Standard



## Friend of the Sea non-Seafood Standard

REV	DATE	REASON	ISSUED BY	APPROVAL
1	10/07/2020	First issue	Mario Passoni and Elisa Bertesago	

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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 and companies that are operating with the FOS standards for sustainable diving activities.

## **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.

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

**e) Diving 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) Coordinates of the diving target area**

<b>i) Number of employees (specify seasonal or permanent employees)</b>
<b>j) Certification and awards</b>
<b>k) Date and type of the audit (initial audit, surveillance audit, recertification audit)</b>
<b>l) Other relevant information</b>

- 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 diving 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 material added to the checklist or attached can represent valid onsite evidence.



### 3. Audit guidance

Scuba diving is a mode of underwater diving where the diver uses a self-contained underwater breathing apparatus (scuba), which is completely independent of surface supply, to breathe underwater. Since this sport is a fascinating and attractive activity, in particular in tropical areas and in any point of interest for divers, there are many companies around the world that provide guided diving activity for tourists.

For this reason, Friend of the Sea aims to certify all those companies that provide sustainable diving activities, meaning experiences that bring tourists in contact with underwater ecosystems in full respect of marine life, sensitizing to environmental issues and educating to marine conservation.

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 diving activity.

#### 3.1 Authorization and permits

Requirement		Level
1.1	Diving 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 diving 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 research on

the ecosystem health status and the evidence collected from stakeholder groups including tour operators, NGOs, scientists and the public.

As a proof of conformity, the auditor shall collect a copy of the permission to practice diving activities 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	<b>All vessels used in diving operations are authorised under the national legislation, where applicable.</b>	<b>Essential</b>

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.

As a proof of conformity, the auditor shall collect 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 Crew and diving guides

Requirement		Level
2.1	<b>The captain and crew of the boat must always pay attention to avoid collisions with marine animals during the cruise phase. If the boat has to anchor, care must be taken to avoid damaging marine organisms.</b>	<b>Essential</b>

It is essential that the captain and the crew are always aware of marine animals' presence around the boat, in order to avoid collision that could injury them during the cruise phase and the anchorage. The crew must pay particular attention to where to anchor, to avoid damaging seabed, in particular coral reefs, seagrass meadows and other marine organisms.

The auditor shall verify on-board if the captain and the crew maintain a proper behaviour during the cruise phase and the anchoring.

Requirement		Level
2.2	<b>Diving guides must have undergone training on how to dive sustainably.</b>	<b>Essential</b>

In order to provide accurate information to tourists before and during the diving activity, the diving guides must follow training programs on the ecology and biology of the site of interest, with particular attention to the environmental issues and sustainable solutions. Moreover, they must be informed about the Friend of the Sea Sustainable Diving project in order to sensitize participant about it.

The auditor shall collect any evidence of training, workshop or course organised by the company to train all diving guides. To verify this requirement, the auditors shall

evaluate the content of training/workshop/courses and may interview the diving guides to verify their competency. Certificate of attendance of the diving guides must be collected as proof of conformity.

Requirement		Level
2.3	<b>The company must ensure that divers have successfully achieved a diving license. Otherwise, the company can conduct a water test responsibly and / or provide a diving course.</b>	<b>Essential</b>

In order to ensure participants' safety and amusement and to reduce the risk of accidentally damaging marine ecosystem, each tour participant must have a diving licence to take part to diving activities. Otherwise, the company has got the responsibility to train the novel divers, conducting water tests and providing proper diving courses. Inexpert divers require the particular attention of the diving guide during the excursion, in order to reduce the risks of bumping into rocks, corals or any form of benthic marine life, injuring themselves and the ecosystem.

The auditor shall collect any evidence of diving courses organised by the company to train to the novel divers and all inexpert participants.

<b>Requirement</b>		<b>Level</b>
<b>2.4</b>	<b>The company must ensure that tour participants have all the diving equipment and that they wear it appropriately during diving activities. If the divers do not have the equipment or some components, the company will provide it.</b>	<b>Essential</b>

If divers do not have their own equipment, it is the responsibility of the company to provide them with the equipment necessary for the diving activity. Each one has to wear all the minimum equipment of the proper size and in good condition. The minimum equipment comprehends:

- Filled scuba tank
- Regulators
- Scuba Buoyancy compensator device (BCD)
- Wetsuit
- Weight belt and appropriate weights
- Fins
- Mask
- Dive computer
- Dive light
- Surface Marker Buoy (SMB)

Auditors shall verify that the company has several sizes of each essential item of the diving equipment to provide to the divers.

<b>Requirement</b>		<b>Level</b>
<b>2.5</b>	<b>The company has enough life jackets on-board for all the divers, crew and diving guide(s) and additional diving equipment to be used in the case of necessity.</b>	<b>Essential</b>

For collective safety, it is mandatory to have life jackets on-board during each diving trip, in a number greater than or equal to all divers, crew and diving guides. Moreover, it is opportune that additional diving equipment is present on-board, in case of necessity.

The auditor shall verify on-board the compliance with the requirement.

<b>Requirement</b>		<b>Level</b>
<b>2.6</b>	<b>The company shall always ensure that the weather and sea conditions are suitable for diving activities.</b>	<b>Essential</b>

The weather and sea conditions must be always evaluated before a diving activity and in case of inappropriate conditions, the trip must be deleted or postponed. This to preserve participant safety and amusement and to reduce the risk of damaging the ecosystem (it is particularly relevant in presence of coral reefs, that could be seriously damaged if bumped).

The auditor shall verify the compliance with the requirement by assessing the procedure followed by the diving centre under audit and by making a practical example.

Requirement		Level
2.7	<p><b>The diving guide will provide the divers with a complete briefing on the tour.</b></p> <p><b>This shall happen at the beginning of the tour.</b></p>	Essential

The diving guide has not only the role of accompanying the participants during the excursion but must also provide the divers with a complete briefing on the tour before starting with the diving activities. This briefing is very important since it provides the following information:

- Safety rules on board
- Safety diving rules on board (how to get the equipment on, safety oxygen, etc...)
- Geographical indications and weather conditions
- Expected species typical of the site
- Any environmental issue or threat of the site
- Duration, max depth and route of the excursion
- Check of the diving equipment
- How to get off and on the boat
- Safety rules to be adopted into the water
- Signals to communicate underwater
- Sustainable behaviour to be adopted for the entire duration of the trip
- What a sustainable diving activity is
- Info about the Friend of the Sea Sustainable Diving project
- Questions

We recommend a general boat briefing and equipment check before the departure and the diving briefing before to prepare for the dive. Alternatively, the briefing could be done before the departure with a reminder just before the dive.

The auditor shall verify on-board the compliance with the requirement.

<b>Requirement</b>		<b>Level</b>
2.7.1	Accurate information is provided to divers on how to behave while diving.	<b>Essential</b>

During the briefing, the diving guide has to highlight the rules of conduct to follow during the excursion. This is an essential task to guarantee a sustainable activity, because educates divers to what is allowed and what is forbidden during the activity.

The auditor shall verify on-board the compliance with the requirement.

<b>Requirement</b>		<b>Level</b>
2.7.2	Accurate information is provided to divers about environmental issues related to the marine habitat and how everybody can contribute to reduce the impact.	<b>Essential</b>

During the briefing, the diving guide has to highlight the environmental issues related to the marine habitat and how everybody can contribute to reduce the impact. This is an essential task to guarantee a sustainable activity, with also possible future positive feedback, because educates divers to the importance of the marine conservation sensitizing them to act responsibly.

The auditor shall verify on-board the compliance with the requirement.



<b>Requirement</b>		<b>Level</b>
<b>2.8</b>	<b>At the end of the excursion, a final debriefing will be carried out to increase the awareness of the divers and receive the necessary feedback to improve diving activities.</b>	<b>Essential</b>

A final task of the diving guide is to conduct a debriefing at the end of the excursion. During this debriefing the divers can give their feedback to improve the diving activity and the diving guide has got a further occasion to remark the importance of the marine conservation increasing participants' awareness.

The auditor shall verify on-board the compliance with the requirement.

<b>Requirement</b>		<b>Level</b>
<b>2.9</b>	<b>The company promote the no-touch and no-take policy, also by avoiding exposing organisms or part of organisms in their internal or external spaces.</b>  <b>Exceptions are allowed only if those organisms or part of the organisms are used for educational purposes.</b>	<b>Essential</b>

In order to maintain a coherence with the sustainable diving activity provided, the company promote the no-touch and no-take policy, also by avoiding exposing organisms or part of them in their internal or external spaces. If the company already disposes organisms or part of them, it undertakes not to collect or buy new ones and uses the owned for educational purpose.

Organisms or parts of organisms already used or exhibited must be strictly inventoried and used for educational purposes. The inventory will then be checked in the subsequent audit.

The auditor shall verify the compliance with the requirement.

### 3.3 How to behave into the water

Requirement		Level
3.1	<b>Diving groups are made by maximum 8 divers plus a professional guide.</b>	<b>Essential</b>

To guarantee safety and a proper attention to each participant and to reduce the impact on the marine ecosystem, it is necessary to organize diving groups of maximum 8 divers plus a professional guide. In case of divers who require special attention, for example in presence of inexperienced divers, it could be necessary to organize smaller groups with one or more professional guides per group.

The auditor shall verify the compliance with the requirement on-board and during the excursion.

Requirement		Level
3.2	<b>Divers must stay no more than 10 meters (32 ft) from the guide without ever passing the guide or swimming slower than the guide that closes the group, where present.</b>	<b>Essential</b>

It is important to keep the group of participants compact, in order to guarantee the respect of the ecosystem, the safety of the divers and to permit them to reach and

communicate with the guide in any moment. During the diving activity, tour participants must stay no more than 10 meters far from the guide. Moreover, they have not to pass the diving guide or swimming slower than the guide that closes the group, where present.

The auditor shall verify the compliance with the requirement on-board and during the excursion.

Requirement		Level
3.3	<b>Divers shall manage their trim and buoyancy in order to avoid damaging any marine organisms on the bottom or kicking up sand with fins while swimming.</b>	<b>Essential</b>

The divers have to keep a behaviour that minimize the disturbance of the marine life and that reduce the risk of injury. For this reason, they shall manage their trim and buoyancy to minimize the possibility of damaging marine benthic organisms or kicking up sand with fins while swimming. This is particularly important in coral reefs area, where careless divers can affect greatly the ecosystem.

The auditor shall verify the compliance with the requirement on-board and during the excursion.

Requirement		Level
3.4	<p><b>The guide(s) shall always be aware of the position of the divers and monitor that they have no problems.</b></p> <p><b>The captain and the crew shall monitor the surface of the water of the diving area until all the divers have resurfaced, in order to be able to intervene promptly in case of emergency.</b></p>	Essential

It is important that all the divers are constantly under the control of the guide(s) into the water and that the captain and the crew monitor the surface of the water of the diving area from the boat, until the divers resurface. To facilitate the monitoring, the divers must stay in a compact group and guide(s), captain and crew must be careful and ready to face up any problem or emergency.

The auditor shall verify the compliance with the requirement on-board and during the excursion.

Requirement		Level
3.5	<p><b>The guide(s) into the water and the crew on board the boat are always ready to help any diver who is in difficulty before, during and after the dive.</b></p>	Essential

In line with the previous requirement 3.4, the guide(s) and the crew are responsible of the safety of the divers and for this reason they must be always ready to help whoever is getting trouble before, during and after the diving activity.

The auditor shall verify the compliance with the requirement on-board and during the excursion.

Requirement		Level
3.8	<p><b>Divers are invited to collect any type of garbage found during the dive and bring it back on board the boat.</b></p> <p><b>The company will take care to properly dispose of this waste.</b></p>	<b>Recommendation</b>

A sustainable diving activity requires a particular attention to the protection of the marine environment. For this reason, if during the dive any type of garbage is found, divers are invited to collect and bring it on board of the boat in order to dispose it properly.

In addition, all divers are required to put particular attention to their own equipment in order to do not loose anything once into the water. The staff onboard shall double check this before each dive.

The auditor shall verify the compliance with the requirement on-board and during the excursion.

### 3.4 Interaction with marine life

Requirement		Level
4.1	<p><b>Always keep a minimum distance of 3 meters (10 ft) from the marine megafauna, including manta rays, sharks, whale sharks, sea eagles, stingrays, dugongs, manatees, seals.</b></p> <p><b>In the case of sea turtles, the minimum distance is 2 meters (6,5 ft).</b></p>	<b>Essential</b>

In order to avoid stressing in any way marine megafauna all divers and guides must keep a minimum distance of 3 meters from each animal, reduced to 2 meters for sea turtles. Marine megafauna is defined as the whole of cetaceans, pinnipeds, sirenians, marine and estuarine reptiles, large fishes such as billfishes, tunas, sharks and rays and seabirds. All these animals tend to have a long-life span, relatively high age at maturity and low rates of reproduction, characteristics that make their population particularly vulnerable to anthropogenic threats (<https://www.frontiersin.org/journals/marine-science/sections/marine-megafauna#about>).

The minimum distance is in line with the standards of the Friend of the Sea audit guides relating to whale sharks (Requirement 3.6), manta rays (Requirement 3.6), sea turtles (Requirement 3.7).

The auditor shall verify the compliance with the requirement on-board and during the excursion.

<b>Requirement</b>		<b>Level</b>
<b>4.2</b>	<b>Diving with cetaceans (whales and dolphins) is prohibited. If, however, fortuitous encounters occur, always keep a minimum distance of at least 3 meters (10 ft) and do not touch the cetaceans.</b>	<b>Essential</b>

In relation to the previous requirement 4.1 and in line with the standard of Friend of the Sea explained in the Audit guidance for dolphin and whale watching (Requirement 5.1), swim-with cetaceans activities are prohibited and for this reason the company under audit must not organize diving-with cetaceans activities.

However, if fortuitous encounters occur, it is important to minimize the disturbance maintaining a minimum distance of at least 3 meters and avoiding touching the cetaceans.

The auditor shall verify the compliance with the requirement on-board and during the excursion.

<b>Requirement</b>		<b>Level</b>
<b>4.3</b>	<b>Do not touch any marine organism.</b>	<b>Essential</b>

It is strictly forbidden to touch any marine organism in order to avoid stressing or hurting animals and for the safety of the tour participants. In facts some marine organisms are thorny, stinging or poisonous and if touched could injury divers.

The auditor shall verify the compliance with the requirement on-board and during the excursion.

Requirement		Level
4.4	<b>It is strictly forbidden to remove any marine organism from where it is found to show it to the divers.</b>	<b>Essential</b>

In line with the no-touch and no-take policy mentioned in the requirement 2.9, it is strictly forbidden for divers and diving guides to remove any marine organism from where it is found. Not only it is forbidden to remove marine organisms from the sea, but it is also prohibited to bring to surface any organism because this behaviour could threaten the survival of the marine animal.

The auditor shall verify the compliance with the requirement on-board and during the excursion.

Requirement		Level
4.5	<b>It is strictly forbidden to take any object (i.e.: shells, corals, ...), animal or plant from the sea as souvenir.</b>	<b>Essential</b>

In line with the previous requirement 4.4, not only marine organisms but also any natural object must not to be removed from the habitat as a souvenir. This is a primary rule into marine protected areas, where particularly fragile ecosystems are completely off limits to the public to avoid any stress. Friend of the Sea want to adopt the same no-take policy in any marine area, because it is clearly the most sustainable way to visit a marine ecosystem.

The auditor shall verify the compliance with the requirement on-board and during the excursion.



Requirement		Level
<b>4.6</b>	<b>Do not use the flash of cameras near the eyes of marine megafauna, especially at night. Always keep a distance of at least 3 meters (10 ft) (except for sea turtles, where 2 meters (6,5 ft) are allowed) to use the flash.</b>	<b>Essential</b>

When divers and diving guide(s) take pictures to the marine megafauna (defined in the requirement 4.1) they must pay attention to the use of flash, especially at night. The flash does not have to be oriented directly to the eyes of the animals. As described in the requirement 4.1, it is important to maintain a minimum distance of 3 meters from the marine megafauna (2 meters for sea turtles) and also cameras or selfie sticks must respect these dispositions.

The auditor shall verify the compliance with the requirement on-board and during the excursion.

Requirement		Level
<b>4.7</b>	<b>Avoid using the flash multiple times on the same subject.</b>	<b>Essential</b>

In order to minimize the stress on the marine megafauna, it is necessary to avoid using flash multiple times on the same subject, meaning more than 3-4 times. In facts, even if photographic flashes are negligible and do not have stronger impacts than those caused solely by human presence (De Brauwer, et al., 2018), it seems that shutter noise and the constant human presence disturb marine animals (Huang, Lubarsky, Teng, & Blumstein, 2011).

The auditor shall verify the compliance with the requirement on-board and during the excursion.

<b>Requirement</b>		<b>Level</b>
<b>4.8</b>	<b>Avoid moving marine organisms to obtain a better photography.</b>	<b>Essential</b>

During the diving activity, it is forbidden to move marine organisms to obtain a better photography because this behaviour is a source of stress for marine life.

The auditor shall verify the compliance with the requirement on-board and during the excursion.

<b>Requirement</b>		<b>Level</b>
<b>4.9</b>	<b>If used, the selfie stick shall be considered as an extension of the arm, therefore it shall be kept at a minimum of 3 meters (10 ft) from marine megafauna (except for sea turtles, where 2 meters (6,5 ft) are allowed) and at a suitable distance from any marine organism present in the excursion site.</b>	<b>Essential</b>

In relation to the previous requirements 4.1 and 4.6, the minimum distance of 3 meters from the megafauna (reduced to 2 meters for the sea turtles) considers also any possible extension of the body, for instance selfie sticks or cameras, that must not to be further get close to the marine megafauna.

The auditor shall verify the compliance with the requirement on-board and during the excursion.

Requirement		Level
<b>4.10</b>	<b>It is forbidden to feed any animal.</b>	<b>Essential</b>

Since any interaction that could interfere with marine life is prohibited, it is strictly forbidden to feed any animal. This practice must be avoided because it could alter the feeding and foraging behaviour of the marine animals, eventually affecting the trophic chain into the excursion site, and moreover the provided food could be not digestible.

The auditor shall verify the compliance with the requirement on-board and during the excursion.

Requirement		Level
4.10.1	It is strictly forbidden to feed sharks.	Essential

In line with the previous requirement 4.10, since sharks are particularly affected by human presence, is strictly forbidden to feed these animals because it could alter their feeding behaviour and they could associate humans to a source of food, and this latter consequence is dangerous for divers and sharks too.

The auditor shall verify the compliance with the requirement on-board and during the excursion.

<b>Requirement</b>		<b>Level</b>
<b>4.11</b>	<b>It is forbidden to chase any marine organism. Fishing activities are prohibited.</b>	<b>Essential</b>

During the dive, it is strictly forbidden to chase any marine organism and for this reason the fishing activities are prohibited. In fact, with a view to a sustainable activity, the excursion site must not be affected in any way by the presence of the diving activity.

The auditor shall verify the compliance with the requirement on-board and during the excursion.

<b>Requirement</b>		<b>Level</b>
<b>4.12</b>	<b>Marine megafauna shall be approached never from the front nor from the rear, from above or from below, but always from the side.</b>	<b>Essential</b>

In order not to stress marine megafauna and to minimize the impact of the human presence, marine megafauna shall be approached never from the front nor from the rear, from above or from below but always from the side. In fact, a different approach could be perceived as a threat and could force the animals to change their behaviour or go away. Similarly, also boats must approach marine megafauna from the side, paying always attention to the position of the animals in order to avoid any collision.

The auditor shall verify the compliance with the requirement on-board and during the excursion.

<b>Requirement</b>		<b>Level</b>
<b>4.13</b>	<b>If marine megafauna should spontaneously approach one or more divers, they will have to try to make very slow movements, to avoid frightening the creature that is approaching.</b>	<b>Essential</b>

In the lucky case that marine megafauna would spontaneously approach one or more divers, the proper behaviour to adopt is to make very slow and gentle movements, in order to avoid frightening the animals, trying not to block in any way their passage.

The auditor shall verify the compliance with the requirement on-board and during the excursion.

<b>Requirement</b>		<b>Level</b>
<b>4.14</b>	<b>Do not touch the corals, sponges, or anything else, do not stand on the reef.</b> <b>To do not damage the reef, keep a minimum distance of 1 meter (3,2 ft) from it.</b> <b>Only applicable to coral reef areas.</b>	<b>Essential</b>

In case of excursion in a coral reef area, much attention must be given to the coral reef. It is strictly forbidden to touch corals, sponges or anything else because it damages the ecosystem and could injury the diver. In order to reduce the risk of bumping into the coral reef, divers must maintain a minimum distance of one meter from it.

The auditor shall verify the compliance with the requirement on-board and during the excursion.

<b>Requirement</b>		<b>Level</b>
<b>4.15</b>	<b>Divers shall avoid dangling equipment, to reduce the risk of damaging the marine ecosystem.</b>	<b>Essential</b>

In order to reduce the risk of damaging the marine ecosystem or break their diving tools, divers must pay attention to their equipment, maintaining dangling items well anchored to their body by using clips such as stainless steel simple or double ended bolt snaps.

The auditor shall verify the compliance with the requirement during the excursion.

<b>Requirement</b>		<b>Level</b>
<b>4.16</b>	<b>Divers shall avoid using dive torch light directly on and nearby the eyes of the marine organisms both during the day and night dive.</b>	<b>Essential</b>

In order to minimize the stress to marine organisms, divers shall avoid using dive light directly or nearby the eyes of marine animals during day and night dives. In facts, if a diver wants to better observe or show to the buddy a marine organism, he/she should enlighten it with the circle of fainter light that surround the central light beam of the dive torch. Thus, it is forbidden to use the central beam to show organisms.

The auditor shall verify the compliance with the requirement during the excursion.

### 3.5 Sustainable equipment

Requirement		Level
5.1	<b>The company supplies wetsuits made of sustainable material to tour participants.</b>	<b>Recommendation</b>

In order to avoid releasing into the sea polluting microfragments, or creating further waste, which is difficult to recycle, the company is committed to supply wetsuits made of sustainable materials to divers. In fact, there are several brands that produce wetsuits in naturalprene, an all-natural latex rubber harvested from sustainable rubber tree farms, and that use solvent-free glues in the production process.

The auditor shall verify the compliance with the requirement evaluating if the wetsuits are made of a sustainable material.

Requirement		Level
5.2	<b>The company uses eco-friendly anti-fog to avoid fogging the divers' masks.</b>  <b>Alternatively, the company will recommend using saliva to avoid tarnishing the masks.</b>	<b>Recommendation</b>

In order not to release any chemical pollutant into the sea, the company is committed to use eco-friendly anti-fog to avoid fogging the divers' masks and in alternative, it could suggest using saliva to divers, since it is a good and sustainable anti-fog solution for the mask.

The auditor shall verify the compliance with the requirement evaluating if the anti-fog used from the company are eco-friendly.

Requirement		Level
<b>5.3</b>	<b>The company uses sustainable and environmentally friendly products to wash diving equipment.</b>	<b>Recommendation</b>

Since the cleaning of the equipment requires the use of water and detergents, the company is committed to use sustainable and environmentally friendly detergent, in order to avoid polluting sea with chemical pollutants. The detergent should be 100% biodegradable and should contain just natural ingredients.

The auditor shall verify the compliance with the requirement evaluating if the detergents used by the company are sustainable and environmentally friendly.

### 3.6 Sustainable sunscreen

Requirement		Level
<b>6.1</b>	<b>It is requested to use only sustainable sunscreen cream, where applicable.</b>	<b>Recommendation</b>

In order not to release into the water any chemical pollutant that could be potentially environmentally dangerous, the company is committed to use only sustainable sunscreen cream.

The auditor shall verify the compliance with the requirement evaluating if the company adopts only sustainable sunscreen cream.

For further information regarding sustainable sunscreen refer to:



<https://friendofthesea.org/sustainable-standards-and-certifications/sustainable-omega-3-oil-and-uv-creams/>

Requirement		Level
6.2	<b>The company promotes the use of rash guards or lycra swim wear from sustainable brands.</b>	<b>Recommendation</b>

A sustainable alternative to sunscreen cream could be to use lycra swim produced by sustainable brands, in order to protect the skin from UV ray and to avoid releasing into the water any chemical pollutant that could potentially damage the ecosystem.

The auditor shall verify the compliance with the requirement evaluating if the company adopts only sustainable sunscreen cream.

### 3.7 Waste management

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

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	<b>The company implements measures to prevent dispersion of waste at sea (including fuels, lubricants and plastic materials).</b>	<b>Essential</b>

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	<b>The company uses non-toxic alternatives available in order to avoid the use of toxic, persistent or bio-accumulating substances.</b>	<b>Recommendation</b>

The auditor shall verify and report on evidence that the company 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	<b>The company does not use CFC, HCFC, HFC or other refrigerants that cause ozone depletion.</b>	<b>Essential</b>

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

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

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

Requirement		Level
7.5.1	<b>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.</b>	<b>Recommendation</b>

The auditor shall collect evidence about the procedure used by the company 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 company endeavour to work with port operators to provide adequate, low-cost and accessible disposal facilities.

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

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

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

This is a crucial requirement to perform a sustainable diving activity, in order to reduce the polluting impact of the tour that could negatively impact on the entire marine ecosystem.

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

### **3.8 Energy management**

<b>Requirement</b>		<b>Level</b>
<b>8.1</b>	<b>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.</b>	<b>Recommendation</b>

The auditor shall verify and report evidence that the company 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).

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

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

<b>Requirement</b>		<b>Level</b>
<b>8.3</b>	<b>The company must use at least one renewable energy source for all its activities, including equipment maintenance and to power the compressor.</b>	<b>Recommendation</b>

In line with the previous requirement 8.2 that recommends an improvement in the energy efficiency of the company, it is also required the use of at least one renewable energy source for company's activities. This is a crucial requirement to certify a sustainable activity.

The auditor shall verify and report evidence that the company adopted at least one renewable source of renewable energy.

### 3.9 Social accountability

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	<b>The company shall comply with the following requirements:</b>	
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 <sup>1</sup>	18 (16 under strict conditions)	18 (16 under strict conditions)
Basic Minimum Age <sup>2</sup>	15	14
Light work <sup>3</sup>	13–15	12–14

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 company 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	<b>The company shall comply with the following requirements:</b>	
9.1.2	Pay the employees adequate salaries compliant at least with the minimum legal wages <sup>1</sup> .	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 company to review copies of employees’ contracts, wage records, working hours and pay slips signed by workers to assess full compliance. If the company 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. The auditor shall also make sure that the company 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	<b>The company shall comply with the following requirements:</b>	
9.1.3	Grant employees' access to health <sup>1</sup> 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 company shall have workers' compensation insurance to cover their employees when an illness or injury happens at work. The auditor shall verify that the company 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 company 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
<b>9.1</b>	<b>The company shall comply with the following requirements:</b>	
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 company respects all mandatory safety measures. If a national health and safety standard does not exist in the countries where the company 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 company.

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 company 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
<b>9.1</b>	<b>The company shall comply with the following requirements:</b>	
9.1.7	No discrimination <sup>1</sup> .	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 company 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 company.

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	<b>The company shall comply with the following requirements:</b>	
9.1.8	Rights on board. <b>Only applicable to safari boat tour.</b>	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](http://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 Sustainability commitment

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

The auditor shall verify if the operators introduce tour participants to Friend of the Sea Sustainable Diving 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 ( <a href="https://friendofthesea.org/contact-us/">https://friendofthesea.org/contact-us/</a> ), 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 diving activities in the feedback form available on the Friend of the Sea website.

### 3.11 Other recommendations

Requirement		Level
<b>11.1</b>	<b>The company cooperates with universities, research groups and NGOs, providing data on local marine life.</b>	<b>Recommendation</b>

The cooperation between the company and the academic/scientific groups gives added value to the diving activities, because, beside the enjoyment of the tour participants, these excursions can provide useful data about local marine life distribution and their 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 non-academic research groups.

Requirement		Level
<b>11.2</b>	<b>At least one marine or natural sciences biologist is part of the company's team.</b>	<b>Recommendation</b>

The operators who guide tour participants during the diving activity 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
11.3	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 marine life.	Recommendation

In reference to the Requirement 9.2, 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.

## **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 Diving requirements**
  
- The company DOES NOT COMPLY with Sustainable Diving 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

- De Brauwer, M., LM, G., Shalders, T., Saunders, B., Archer, M., Harvey, E., . . . McIlwain, J. (2018). Behavioural and pathomorphological impacts of fash photography on benthic fshes. *Nature*.
- <https://www.frontiersin.org/journals/marine-science/sections/marine-megafauna#about>. (s.d.). *Frontiers*.
- Huang, B., Lubarsky, K., Teng, T., & Blumstein, D. (2011). Take only pictures, leave only...fear? The effects of photography on the West Indian anole *Anolis cristatellus*. *Current Zoology*, 77-82.