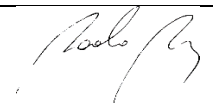


# Friend of the Sea Sustainable Snorkeling Standard



## Friend of the Sea non-Seafood Standard

REV	DATE	REASON	ISSUED BY	APPROVAL
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## Table of content

<b>1.</b>	<b>INTRODUCTION .....</b>	<b>3</b>
1.1	FRIEND OF THE SEA .....	3
1.2	PURPOSE OF THE DOCUMENT .....	3
1.3	REQUIREMENTS CLASSIFICATION .....	4
<b>2.</b>	<b>DESCRIPTION OF THE COMPANY TO BE AUDITED .....</b>	<b>5</b>
<b>3.</b>	<b>AUDIT GUIDANCE.....</b>	<b>9</b>
3.1	AUTHORIZATION AND PERMITS .....	9
3.2	CREW AND SNORKELING GUIDES .....	11
3.3	HOW TO BEHAVE INTO THE WATER.....	17
3.4	INTERACTION WITH MARINE LIFE.....	21
3.5	SUSTAINABLE EQUIPMENT .....	29
3.6	SUSTAINABLE SUNSCREEN.....	30
3.7	WASTE MANAGEMENT .....	31
3.8	ENERGY MANAGEMENT .....	34
3.9	SOCIAL ACCOUNTABILITY .....	35
3.10	SUSTAINABILITY COMMITMENT .....	41
3.11	OTHER RECOMMENDATIONS .....	42
<b>4.</b>	<b>CONCLUSIONS.....</b>	<b>45</b>
<b>5.</b>	<b>REFERENCES.....</b>	<b>47</b>

## **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 snorkeling.

### **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>



<b>h) Coordinates of the snorkeling target area</b>
<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 snorkeling 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

Snorkeling is the sport of swimming equipped with a snorkel, face mask and fins, in order to observe underwater attractions for extended periods of time with a relatively little effort. Since this sport appeals to all ages, it is a popular recreational activity, particularly at tropical resort and scuba diving locations, and thus there are many companies that provide guided snorkeling activities for tourists. For this reason, Friend of the Sea aims to certify all those companies that provide sustainable snorkeling 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 snorkeling activity.

#### 3.1 Authorization and permits

Requirement		Level
1.1	<b>Snorkeling operations are authorised by a permit granted by the responsible authority, for a given area, where applicable.</b>	<b>Essential</b>

In many countries, just a limited number of permitted (licensed) operators can undertake commercial snorkeling 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 snorkeling 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 snorkeling 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 snorkeling 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, Posidonia sea forests 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>Snorkeling guides must have undergone training on how to snorkel sustainably.</b>	<b>Essential</b>

In order to provide accurate information to tourists before and during the snorkeling activity, the snorkeling 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 Snorkeling 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 snorkeling guides. To verify this requirement, the auditors

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

<b>Requirement</b>		<b>Level</b>
<b>2.3</b>	<b>The company must ensure that tour participants know how to snorkel. If some people do not know how to do it, the company will hold a course on how to snorkel and provide participants with life jackets to use during the excursions.</b>	<b>Essential</b>

In order to ensure participants' safety and amusement and to reduce the risk of accidentally damage marine ecosystems, inexperienced tour participants must be trained in order to snorkel properly. In fact, who swims in a sprawling manner or is unable to breathe through the snorkel makes a greater effort getting tired soon and is more likely to accidentally bump into rocks, corals and any form of benthic marine life, injuring himself and the ecosystem. For this reason, the beginners must be trained and could be provided with life jackets to use during the excursion.

The auditor shall collect any evidence of courses organised by the company to train to the snorkeling all inexperienced participants.

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

If participants do not have their own equipment, it is the responsibility of the company to provide tourists with the equipment necessary for the snorkeling trip. Each one has to wear a mask, a snorkel and fins of the proper size. Sometimes also wetsuits, gloves and torches are required.

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

<b>Requirement</b>		<b>Level</b>
<b>2.5</b>	<b>The company has enough life jackets on-board for all the tour participants, crew and snorkeling guide(s) and additional snorkeling 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 snorkeling trip, in a number greater than or equal to all the tour participant, crew and snorkeling guides. Moreover, it is opportune that additional snorkeling 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 snorkeling activities.</b>	<b>Essential</b>

The weather and sea conditions must be always evaluated before a snorkeling 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.

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

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

- Safety rules on board
- Safety snorkeling rules on board (how to get the equipment on, where to keep the equipment, etc...)

- Geographical indications and weather conditions
- Expected species typical of the site
- Any environmental issue or threat of the site
- Duration and route of the excursion
- Check of the snorkeling 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 snorkeling activity is
- Info about the Friend of the Sea Sustainable Snorkeling project
- Questions

We recommend a general boat briefing and equipment check before the departure and the snorkeling briefing before to prepare for the jump into the water. Alternatively, the briefing could be done before the departure with a reminder just before the tour in the water.

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

Requirement		Level
2.7.1	Accurate information is provided to tour participants on how to behave while snorkeling.	<b>Essential</b>

During the briefing, the snorkeling 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 participants to what is allowed and what is forbidden during the snorkeling.

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

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

During the briefing, the snorkeling 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 participants to the importance of the marine conservation sensitizing them to act responsibly.

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

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

A final task of the snorkeling guide is to conduct a debriefing at the end of the excursion. During this debriefing the participants can give their feedback to improve the snorkeling activity and the snorkeling 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.



Requirement		Level
2.9	<p><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></p> <p><b>Exceptions are allowed only if those organisms or part of the organisms are used for educational purposes.</b></p>	<b>Essential</b>

In order to maintain a coherence with the sustainable snorkeling 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 of 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	<p><b>Snorkeling groups are made by maximum 8 tour participants plus a professional guide.</b></p>	<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 snorkeling groups of maximum 8 tour participants plus a professional guide. In case of participants who

require special attention, for example in presence of children or elder people, 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>Snorkelers must stay no more than 10-15 meters (32,8 to 49 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 snorkelers and to permit them to reach and communicate with the guide in any moment. During the snorkeling activity, tour participants must stay no more than 10-15 meters far from the guide. Moreover, they have not to pass the snorkeling 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>Tour participants must enter the water in a gentle way, trying to make as little noise as possible.</b>	<b>Essential</b>

The snorkelers have to keep a behaviour that minimize the disturbance of the marine life and that reduce the risk of injury. For this reason, the entry into the water must

be gentle and must follow the entry of one of the snorkeling guides. People have to make as little noise as possible during the entry and during the snorkeling activity.

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

Requirement		Level
3.4	<b>Tour participants shall swim gently, keep their fins under the top of the surface while swimming, in order to reduce the noise.</b>	<b>Essential</b>

In line with the previous requirement 3.3, the tour participants must minimize the disturbance of the marine life and avoid damaging the seabed or benthic organisms (in particular corals in coral reef ecosystems). For this reason, snorkelers should swim gently keeping their fins under the top of the surface, in order to reduce the noise. Beside respecting marine ecosystem, to swim properly reduces the risk of injury by bumping into the rocks and excessive fatigue for the participants.

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

Requirement		Level
3.5	<b>Use a life buoy to prevent snorkelers from getting tired or in an emergency from standing on corals or similar.</b>	<b>Essential</b>

It is essential to provide a life buoy during the snorkeling activity. It is necessary because it avoids snorkelers from standing on corals whenever they would be tired or in an emergency. Thus, a life buoy is a source of security for the participants and a disincentive to accidentally damage the seabed (particularly relevant in coral reef ecosystems).

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

<b>Requirement</b>		<b>Level</b>
<b>3.6</b>	<b>The guide(s) and / or captain of the boat shall always be aware of the position of the snorkelers and monitor that they have no problems.</b>	<b>Essential</b>

It is important that all the tour participants are constantly under the control of the guide(s) into the water and the captain on the boat. To facilitate the monitoring the snorkelers must stay compact and guide(s) and captain 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.

<b>Requirement</b>		<b>Level</b>
<b>3.7</b>	<b>The guide(s) into the water and the crew on board the boat are always ready to help any person who is in difficulty during the snorkeling activity.</b>	<b>Essential</b>

In line with the previous requirement 3.6, the guide(s) and the crew are responsible of the safety of the snorkelers and for this reason they must be always ready to help whoever is getting trouble during the snorkeling activity.

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

Requirement		Level
<b>3.8</b>	<p><b>Snorkellers are invited to collect any type of garbage found during the snorkeling 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 snorkeling activity requires a particular attention to the protection of the marine environment. For this reason, if during the snorkeling activity any type of garbage is found, snorkelers are invited to collect and bring it on board of the boat in order to dispose it properly.

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

### **3.4 Interaction with marine life**

Requirement		Level
<b>4.1</b>	<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 snorkelers 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.

Requirement		Level
4.2	<b>Snorkeling 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 is prohibited and for this reason the company under audit must not to organize snorkeling 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 snorkelers.

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

<b>Requirement</b>		<b>Level</b>
<b>4.4</b>	<b>It is strictly forbidden to remove any marine organism from where it is found to show it to the participants.</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 tour participants and snorkeling 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.

<b>Requirement</b>		<b>Level</b>
<b>4.5</b>	<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.

<b>Requirement</b>		<b>Level</b>
<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 snorkelers and snorkeling 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.

<b>Requirement</b>		<b>Level</b>
<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 snorkeling 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.

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

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

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

Requirement		Level
4.12	<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.

Requirement		Level
4.13	<b>If marine megafauna should spontaneously approach one or more snorkelers, 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 snorkelers, 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.

Requirement		Level
4.14	<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 snorkeler. Moreover, in case of fatigue or emergency it is forbidden to stand on the reef, but snorkelers must ask for help to the snorkeling guide and use the life buoy as handhold.

The auditor shall verify the compliance with the requirement on-board and 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, the company is committed to supply wetsuits made of sustainable materials to tour participants. In facts, there are several brands that produce wetsuit 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 snorkelers' 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 snorkelers' masks and in alternative, it could suggest using saliva to tour participants, 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 snorkeling 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
<b>6.2</b>	<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
<b>7.1</b>	<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.

<b>Requirement</b>		<b>Level</b>
<b>7.2</b>	<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.

<b>Requirement</b>		<b>Level</b>
<b>7.3</b>	<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.

<b>Requirement</b>		<b>Level</b>
<b>7.4</b>	<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 and equipment 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 snorkeling 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).

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 company regularly calculates its carbon footprint per product unit and is actively engaged in reducing it every year.

### 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	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 <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

- 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.
- 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.
- 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.	Essential

- 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 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
9.1	<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	<b>The company shall comply with the following requirements:</b>	
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	<b>The company shall comply with the following requirements:</b>	
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
9.1	<b>The company shall comply with the following requirements:</b>	
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 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 Snorkeling project.	Essential

The auditor shall verify if the operators introduce tour participants to Friend of the Sea Sustainable Snorkeling 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 snorkeling activities in the feedback form available on the Friend of the Sea website.

### 3.11 Other recommendations

Requirement	Level
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<b>11.1</b>	<b>The company cooperates with universities, research groups and NGOs, providing data on local marine life.</b>	<b>Recommendation</b>
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The cooperation between the company and the academic/scientific groups gives added value to the snorkeling 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.

<b>Requirement</b>		<b>Level</b>
<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 snorkeling 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.

<b>Requirement</b>	<b>Level</b>
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<b>11.3</b>	<b>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.</b>	<b>Recommendation</b>
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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.

<b>Requirement</b>		<b>Level</b>
<b>11.4</b>	<b>The use of boats without engine is encouraged, where applicable.</b>	<b>Recommendation</b>

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 marine life.

## 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 Snorkeling requirements**

**The company DOES NOT COMPLY with Sustainable Snorkeling 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.