

An underwater photograph of a diver in a blue tank, viewed from below, swimming upwards. A large, bright yellow rectangular frame is superimposed over the scene, with the diver's head and shoulders visible through it. The background is a deep blue ocean with many small fish and a coral reef at the bottom.

# The Saba Bank Management Structure

An evaluation and recommendations  
report on the managing of the Saba Bank

October 12, 2022



The better the question. The better the answer.  
The better the world works.

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# Preface

## Saba Bank – a park worth protecting

The Saba Bank is unique in many ways. It is one of the largest submerged atolls in the world and the biggest national park in the Kingdom of the Netherlands. Its significance is particularly based on its unique ecological, socio-economic, scientific, and cultural characteristics. The Saba Bank is a National Park under the Nature Conservation Framework Act BES, a Protected Area of regional importance recognized by the SPAW Protocol, a Particularly Sensitive Sea Area (PSSA) designated by the IMO and identified as an Ecologically and Biologically Significant Area (EBSA) by the Convention on Biological Diversity (CBD). Noting this, it is only by ensuring effective management that a 'park' like the Saba Bank can contribute to the ambitious overarching goals of conservation and sustainability, to ensure its wise use and to protect and monitor its ecosystem services and unique biodiversity. Since 2012, the management of the Saba Bank has been delegated to the Saba Bank Management Unit (SBMU), a 3-person unit, under the daily management of the Saba Conservation Foundation (SCF).

The need for the implementation of this management structure arose after anchorage damage and pollution became significant threats to the biodiversity of the Saba Bank. Irregular enforcement of fisheries regulations and the lack of information available concerning yearly landings from commercial fishermen are the leading causes of illegal fishing practices on and near the Bank. These issues and their solutions form the basis for the objectives and goals set out in the management plan.

### Purpose of this report

Effective management of the Saba Bank is of utmost importance for the biological, ecological, and economic wellbeing of the area. Therefore, it is agreed that the management of the Saba Bank is being evaluated regularly. This report is the result of an in-depth evaluation of the effectiveness of the current management. The focus of this was to assess how the Saba Bank is being managed within the current framework—primarily whether the management is being done effectively in order to achieve the specific goals and objectives stated in the Saba Bank Management Plan and, to the same extent, whether the Saba Bank Management Unit (SBMU) is effectively executing its core tasks and achieving its goals and objectives.

This document provides a holistic description of the current situation and steadily builds towards concrete recommendations based on a comprehensive analysis of stakeholder perceptions, leading practices, and contextual facts.

To determine the current status and evaluate the management structure of the Saba Bank, the following questions were proposed by the client:

- ▶ What are the experiences, perceptions and expectations of the SBMU by relevant stakeholders?
- ▶ What is the effectiveness of operations of the SBMU in relation to the TOR?
- ▶ What is the clarity of the framework of the Saba Bank?
- ▶ What is the efficiency of the current staffing, equipment and facilities of the Saba Bank?
- ▶ What is the effectiveness of governance of the SBMU?
- ▶ Are adjustments necessary to the agreements within the current structure?
- ▶ Are changes to the current structure necessary?
- ▶ Are there alternative structure(s) that could potentially be used?

## Overview of assignment and activities

The assessment was undertaken in two stages. The first stage was a document review of the evidence provided. This enabled the assessment team to gain an understanding of the extent to which the current management structure meets the agreed upon requirements for effective management.

The second stage was on-site visitation and interviews. These took place over five days in Saba and via online meetings during which several stakeholders were engaged. The objective of this part of the assessment was to obtain qualitative evidence through in-depth interviews and focus groups with the different stakeholders. These insights were used to supplement and validate the documentary evidence already reviewed. Following the interviews, the critical documents were revisited to confirm or adjust the initial findings.

## Stakeholder input

The interviews were conducted with relevant members of several stakeholder groups. The focus of these interviews was to gather more information on the realities of the Saba Bank, what the SBMU does, understand the current management structure, and understand the stakeholder landscape. Specific questions were asked to understand stakeholder experiences and expectations but also their own perception of their role in the entirety of the management structure. These discussions were aimed at identifying both the practices that are currently working well and potential areas for improvement. Several overarching themes were identified and used to augment the findings from the document review. The full list of stakeholders interviewed is available in Appendix A.

## Document reviews

To inform the assessment, additional key information was gathered from a thorough review of essential documentation provided by the stakeholders. During these reviews, the stakeholder sentiment was verified and substantiated with evidence found in the provided documentation. A full list of documents reviewed is available in Appendix B.

## Limitations

EY has prepared this report in conjunction with, and partly relying on, information provided by the Ministry of LNV and relevant stakeholders regarding the management of the Saba Bank. Our analysis does not constitute an audit, nor have we sought to verify the accuracy or completeness of the information provided. The findings presented in this report represent a snapshot in time, and activities may have progressed since the assessment was conducted.

“

“Well-governed and effectively managed protected areas are a proven method for safeguarding both habitats and populations of species and for delivering important ecosystem services”

- Convention on Biological Diversity



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# Acronyms & Abbreviations

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<b>BES</b>	Wet grondslagen natuurbbeher en -bescherming
<b>CBD</b>	Convention on Biological Diversity
<b>CITES</b>	Convention on the Conservation of Migratory Species of Wild Fauna and Flora
<b>DCNA</b>	Dutch Caribbean Nature Alliance
<b>DVO</b>	Dienstverleningsovereenkomst
<b>EBSA</b>	Ecologically or Biologically Significant Marine Areas
<b>IUCN</b>	International Union for Conservation of Nature
<b>LNV</b>	Ministry of Agriculture, Nature and Food Quality
<b>OLE</b>	Island Government of St. Eustatius
<b>OLS</b>	Island Government Saba
<b>OMP</b>	Original Management Plan 2008 2008 Management Plan Saba Bank beheer
<b>PSSA</b>	Particularly Sensitive Sea Area
<b>RMP</b>	Recent Management Plan 2018-2022 Management Plan Strategic Plan SBMU

<b>SBM</b>	Saba Bank Management Overall management of the Saba Bank
	Proposed in the OMP in 2008
<b>SBMU</b>	Saba Bank Management Unit Established in 2012 (formerly known as Saba Bank Management Organization, <b>SBMO</b> )
<b>SCF</b>	Saba Conservation Foundation
<b>SFA</b>	Saba Fishermen Association
<b>SMP</b>	Saba Management Plan
<b>SMP</b>	Saba Management Program
<b>SPAW</b>	Specially Protected Areas and Wildlife
<b>TOR</b>	Terms of Reference
<b>WMR</b>	Wageningen Marine Research
<b>WUR</b>	Wageningen University Research







A vibrant underwater scene featuring a large, light blue number '1' and the word 'Context' in white. The background is a deep blue ocean with numerous small, colorful fish (red, orange, and blue) swimming around. On the left side, there are large, textured coral reefs in shades of brown and orange.

# 1 Context

This chapter provides an overview of the location, importance, and history of the Saba Bank. Furthermore, this chapter addresses the management of the Saba Bank by the SBMU but also the entire framework that includes different stakeholders. In addition to the stakeholder landscape and interrelationships, the legislative framework relevant to the Saba Bank is elaborated on.

# 1.1 The Saba Bank

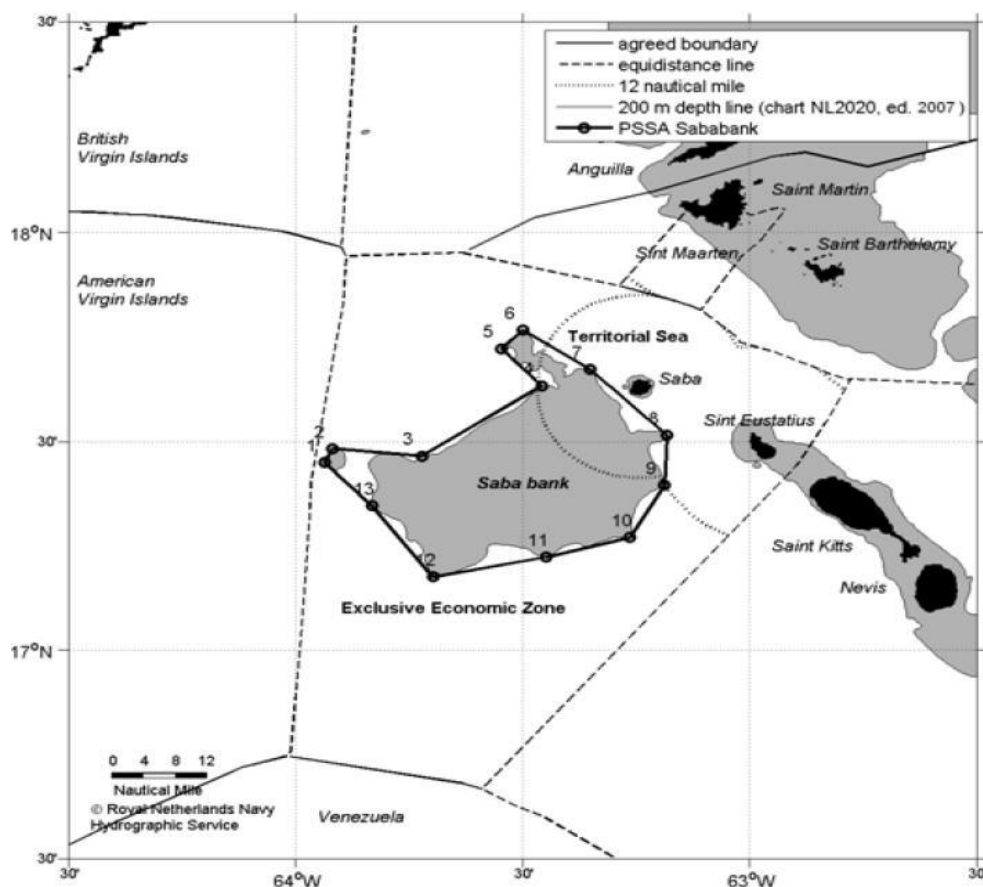
The Saba Bank is one of the largest underwater atolls in the world and the biggest national park in the Kingdom of the Netherlands. The Bank is a flat-topped seamount rising 1800 meters from the seafloor. The Bank is one of the most diverse marine macroalgae in the Caribbean. The natural resources of the Saba Bank include organisms such as coral reefs, fish, lobsters, turtles, and mammals.

The Saba Bank is of high economic importance to Saba. It supports around a dozen full-time fishermen and has a direct economic value of over 1 million dollars a year.

## History of the Saba Bank

For generations, the Saba Bank has been fished by the Sabans. Apart from a number of intrigued scientists, little attention was given to the Saba Bank until the 1980's when many Caribbean nations declared Exclusive Economic Zones (EEZ) and started to control their fisheries. An EEZ is an area in which a sovereign state has control over the exploration and use of marine resources.

Consequently, the Saba Bank became a refuge for foreign fishing vessels that had been excluded from other islands.



Graphical representation of the Saba Bank. Source: Ministry of Infrastructure and Water Management

By declaring an Exclusive Fisheries Zone in 1993, the management of the Saba Bank, in particular its fishery, became the responsibility of the Netherlands Antilles government.

Reports of decreasing fish stocks, destructive fishing activities of foreign vessels, and the anchoring of oil tankers have raised concerns about the environmental state of the Bank. It was suggested to develop a management plan in order to preserve the unique marine habitat. The National Policy paper "Contours of Environmental & Nature Conservation Nature Policy for the Netherlands Antilles" incorporated this recommendation, and again in the National Nature Policy Plan of 2000, the development of a management plan for the Saba Bank was stated as an important objective.

As a first step to realize such a management plan, the department of Environment of the Netherlands Antilles (MINA) initiated a comprehensive fishery catch assessment survey in 1999-2000, in order to get an impression of the fisheries resources of the Saba Bank. Following a rapid assessment expedition in 2006 by Conservation International, MINA, together with the Saba Conservation Foundation (SCF), and with the support of Conservation International, started a more in-depth study of the Saba Bank. The study is the basis for the first management plan for the Saba Bank that was published in 2008.

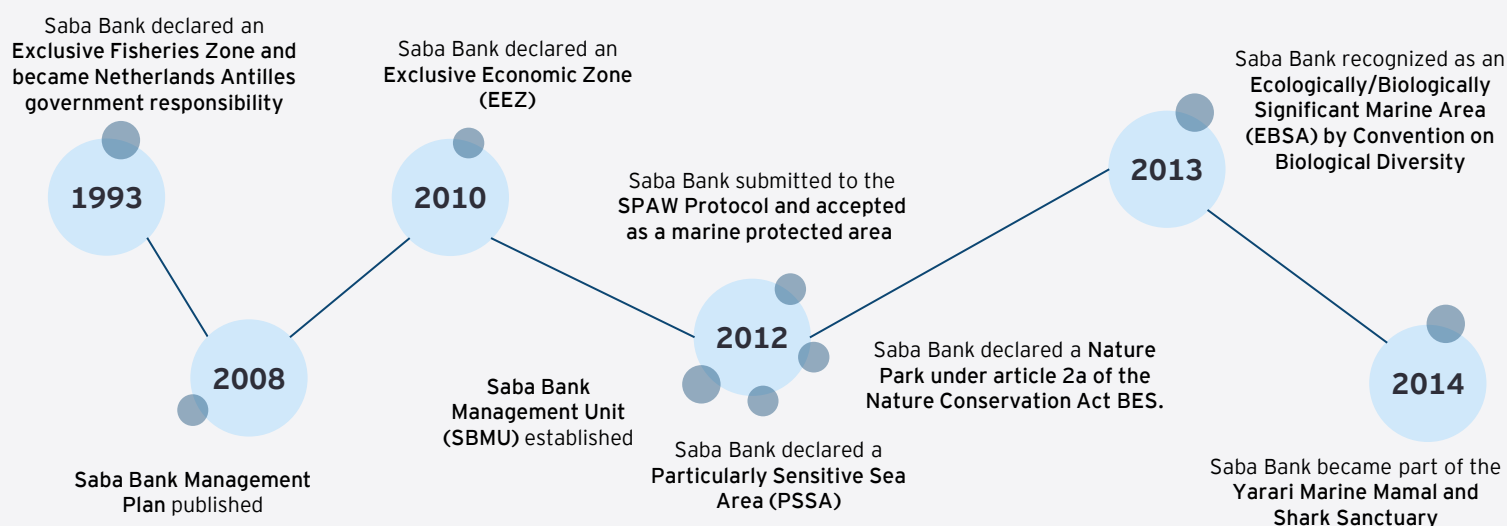
Following the declaration of an Exclusive Economic Zone (EEZ) in June 2010, which includes the entire Saba Bank, the consensus has been reached that, despite a fragmented Dutch Caribbean, the EEZ should be integrally managed.

The Saba Bank Management Plan, which was developed in 2008, created the need for a unit to carry out the tasks and responsibilities set out in this management plan. This unit became a reality in 2012 when the Dutch Ministry of Economic Affairs established the Saba Bank Management Unit (SBMU) in close cooperation with the SCF and the Island Government.

The establishment of the SBMU in 2012 was just one of a series of significant milestones for the Saba Bank during that period. In that same year, the Saba Bank became the world's 13th Particularly Sensitive Sea Area (PSSA), giving it an International Maritime Organization designation as a no-anchoring area as well as an Area To Be Avoided by shipping. It was also designated as a national park and recognized as an area of regional importance by the Specially Protected Areas and Wildlife (SPAW) Protocol.

The following year, the Bank was recognized as an Ecologically/ Biologically Significant Marine Area (EBSA) by the Convention on Biological Diversity. In September 2015, the Saba Bank became part of the Yarari Marine Mammal and Shark Sanctuary, covering all waters of Saba and Bonaire.

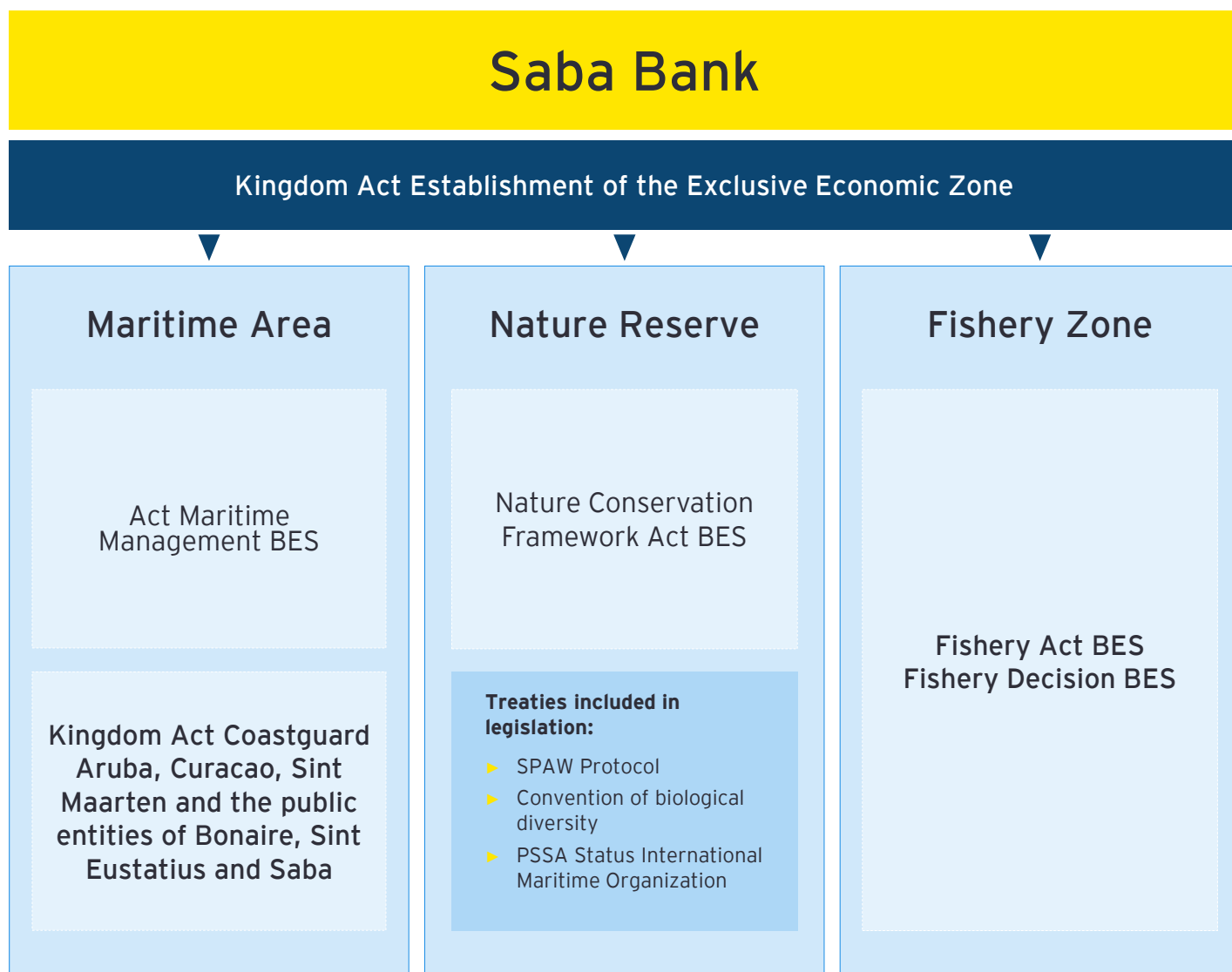
Throughout the years, many other milestones were achieved. Since the establishment of the SBMU, the framework and environment within which the Saba Bank is managed has evolved significantly. Similarly, the requirements of the SBMU and its stakeholders have also become more complex.





## 1.2 Current legal context

The Saba Bank is subject to certain laws.



*\*Only international obligations that directly affect/apply to the management of the Saba Bank have been included.*

Saba, as a special municipality of the Netherlands (local entities), is subject to the Dutch legal framework. However, as stated in the Charter for the Kingdom of the Netherlands, the European parts and Caribbean parts of the Netherlands are subject to different laws and regulations. In the Dutch Caribbean, the former, adapted laws of the Dutch Antilles are still applicable. In certain fields, legislation has been adapted using the Dutch legislative model.

These laws are the so-called BES laws. As the Kingdom of the Netherlands is the contracting party of several international treaties and conventions, Saba also has to abide by these agreements. The figure above depicts the legal context that includes the applicable laws and international obligations\* for the Saba Bank.

### Exclusive economic zone

The Saba Bank is located in the Exclusive Economic Zone, making it subject directly to the 'Rijksoverheid' instead of the public entity Saba. This was established in the 2010 Kingdom Act Establishment of the Exclusive Economic Zone (Rijkswet instelling exclusieve economische zone). The law states that the Kingdom of the Netherlands has the sovereign right to explore and exploit, manage, and preserve all living and non-living natural resources in the zone.

### Maritime area

The Act Maritime Management BES (Wet Maritime Beheer BES) authorizes the minister of Infrastructure and Water Management to instruct users of the maritime zone within his control. This legislation focuses on control of the maritime area, the execution of specific treaties, and the UN Convention on the Law of the Sea. This law also includes legislation on enforcement and sanctions. The responsibility for law enforcement lies with the Dutch Coastguard, which is established by law in the Coastguard Aruba, Curacao, and Sint Maarten and the public entities of Bonaire, Sint Eustatius, and Saba Kingdom act (Rijkswet Kustwacht Aruba, Curacao, en Sint Maarten alsmede de openbare lichamen Bonaire, Sint Eustatius en Saba). As stated in the law, the Coastguard's responsibilities include the supervision of fisheries and the environment.

### Nature reserve

The Nature Conservation Framework Act BES (Wet grondslagen natuurbeheer-en bescherming BES) forms the legal establishment of the nature conservation duties of the public entities of Bonaire, Sint Eustatius, and Saba in their territorial zone. The Minister of Agriculture, Nature, and Food Quality is directly responsible for carrying out the duties in the exclusive economic zone. These duties include the protection of biological diversity; the use of natural components; and the fair and equitable distribution of the benefits that come from the utilization of genetic sources. It is established in this law that the ministry makes nature and environmental policy every five years, as it is to be implemented by the public entities.

In this legislation, international treaties and conventions have been incorporated. The Saba Bank has been designated as a National Nature Park by the Minister of LNV. This is in line with the implementation of the Specifically Protected Areas and Wildlife (SPAW) protocol and the Convention on biological diversity. The SPAW protocol implies that protected areas should be established, and protection measures need to be taken to plan and manage the protection of these areas. Included in the Convention on biological diversity is in situ conservation, which states, among others, that protected areas need to be established and management needs to be established to conserve biological diversity in these designated areas.

The Saba Bank was also granted Particularly Sensitive Sea Area (PSSA) status by the International Maritime Organization. The PSSA status protects the area from marine traffic, which includes the status of a "no-anchor" zone for all ships and its designation of the area to be avoided by ships of gross tonnage of 300 tons or over.

### Fishery zone

The Fisheries Act BES (Visserijwet BES) and Fisheries Decisions BES (Visserijbesluit BES) provide rules and regulations concerning the fisheries in the territorial waters of the BES islands and in the EEZ. The legislation includes articles on the licenses for fisheries in these zones as well as rules and regulations on fish to be caught, fishing gear, and vessels. This law also obligates fishermen, through their licenses, to participate in data collection processes for research and monitoring purposes. In the Fishery Act BES, the Fisheries Committee BES (Visserij Commissie BES) is established by law. Licenses are granted either by the public entity of the territorial water the license is for, or directly by the ministry in the case of licenses for fisheries in the EEZ.

## 1.3 Stakeholder landscape

Managing the Saba Bank is done within an intricate network of stakeholders. Together, these stakeholders each have a role within the Saba Bank management framework.

### Ministry of Agriculture, Nature and Food Quality

The Ministry of LNV is tasked with stimulating sustainable agriculture and fishery around the BES-islands. They are responsible for the proper management of fisheries in the Exclusive Economic Zone (EEZ) around the islands and, together with the island governments, have responsibility for the territorial waters. The Ministry of LNV is the main source of funding for the SBMU.

Within the framework of managing the Saba Bank, LNV is having research conducted into the coral reefs, whales and dolphins, and the fishery and fish stock.

### Saba Bank Management Unit

The SBMU was established in 2012 after the Dutch government tasked the SCF with establishing a unit in accordance with the principles laid out in the Terms of Reference. The unit is tasked with the execution of the Management Plan and Terms of Reference.

### The Saba Conservation Foundation (SCF)

The SCF is an NGO based in Saba. The SBMU forms a separate unit within the SCF's Marine Park unit. The daily management is delegated to the SCF. Their manager oversees the budgeted expenses and day-to-day management of the unit. They also take part in the Steering Committee.

### Island Government Saba (OLS)

The Island Government (OLS) ensures that SBMU programs are aligned with local policy and provides logistical support and advice. A representative of the OLS takes a seat in the Steering Committee.

### The SBMU Steering committee

A small steering group, consisting of the SCF Parks Manager, LNV and the OLS, is responsible for the overall management and planning. The SBMU reports to the steering committee and the EEZ committee. The steering committee convenes at least twice a year to evaluate and direct the program. Every two years, the program is evaluated externally. The budget is established annually by the steering committee and includes funds for staffing, monitoring, and equipment; office overhead; boat maintenance; research support; and operational costs.

### EEZ Committee

The EEZ Committee consists of representatives of each of the Dutch Caribbean Islands and the Netherlands who have signed the agreement for joint management of the EEZ waters (EEZ agreement). The current members are Bonaire, Curaçao, Saba, St. Eustatius, and the Netherlands.

### Coast Guard

The Coast Guard operates within the maritime areas of Aruba, Curaçao, Sint Maarten, and the Caribbean Netherlands and the airspace above them. Since July 1, 2011, the uniform enforcement policy has been in force on the Saba Bank. By using the Automatic Identification System (AIS) on Saba, the coastguard performs the surveillance tasks.

The annual plan of the Coast Guard stipulates that the Coast Guard must be present on the Saba Bank 10 days a month.



## Research institutions

From a scientific perspective, little is known about how the various ecological habitats of the Saba Bank function and how they relate to each other. The Dutch government funds research on the biodiversity, health and ecological functioning of the Saba Bank. Research requires data: SBMU is an extremely valuable partner in collecting data for scientific research. The research is mostly initiated by Wageningen Marine Research (WMR). They oversee the research on the Saba Bank and provide interns. Another example of a research organization is the St. Eustatius-located Caribbean Netherlands Science Institute (CNSI).

## Dutch Caribbean Nature Alliance (DCNA)

The DCNA is a nonprofit organization created to safeguard nature in the Dutch Caribbean through supporting Protected Area Management Organizations. The SCF (and SBMU) are members of the DCNA.

## Island government St Eustatius (OLE)

A small part of the Saba Bank is located in the territorial waters of St Eustatius. These waters fall under the responsibility of the island government of St Eustatius (OLE). Because of this, OLE is listed as a stakeholder. However, contact between the SBMU and OLE is limited.

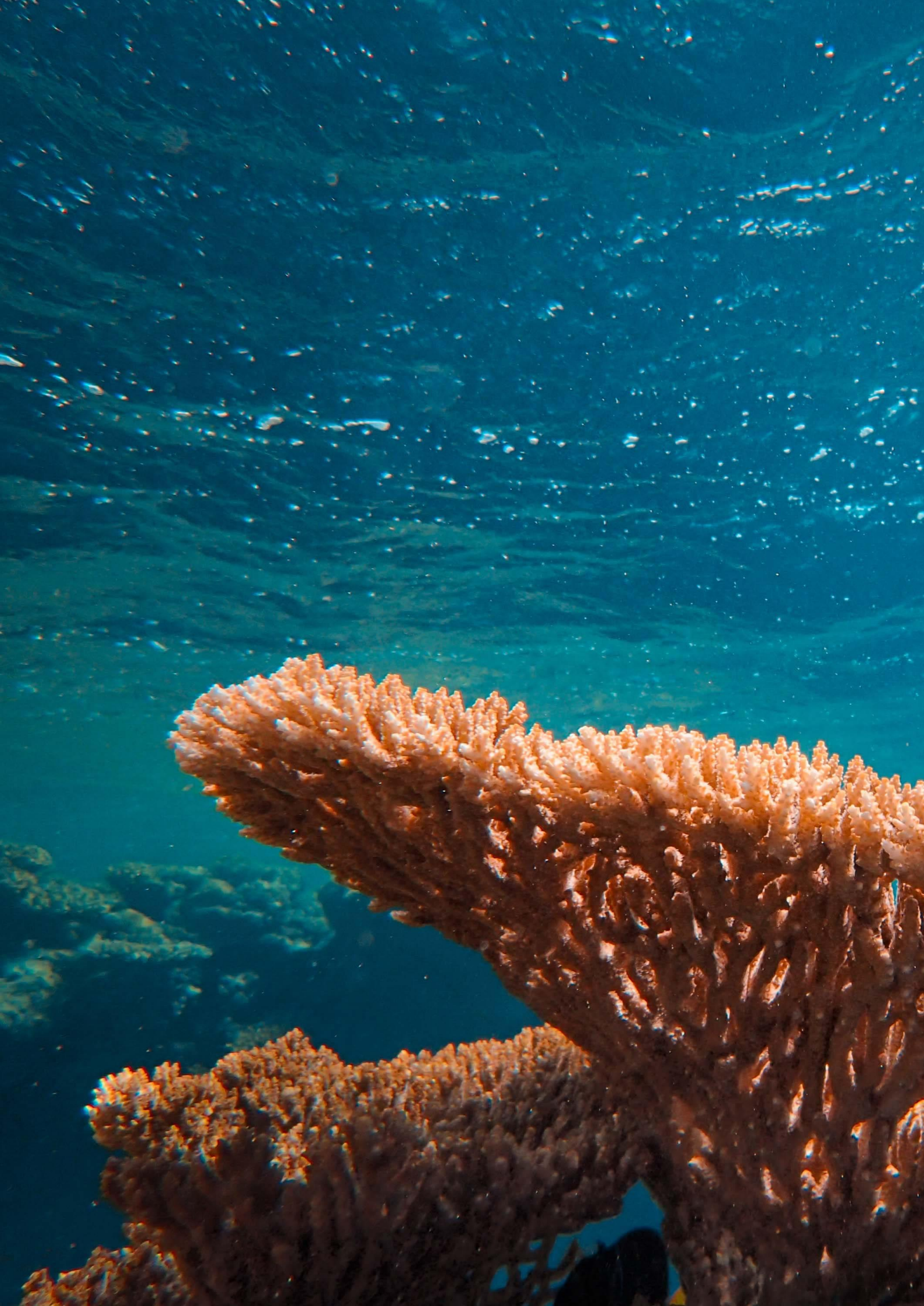
## Fisheries Commission BES

The Fisheries Commission BES (FCBES) is an advisory body designed to improve fisheries management and policy-making in the Caribbean Netherlands. This commission allows Bonaire, St. Eustatius, Saba, and the national government to discuss and advise the Minister of Agriculture, Nature, and Food Quality on permit requests and policy issues regarding sustainable fisheries management in Caribbean Netherlands.

## Fishermen and the Saba Fishermen Association

The fishermen are influential to the Saba Bank because they are the primary users. Furthermore, fishermen are indispensable to the SBMU for the collection of data. To collect data on fisheries, the SBMU relies on fishermen for the sampling of their catch. The SBMU does port-sampling after the fishermen return from the Saba Bank and they regularly join the fishermen on their boats for more reliable data collection.

To support the local fishermen and to give them a voice for positive choices towards the commercial fishing industry on the Saba Bank, the Saba Fishermen Association was established in 2019. With the profit they make, SFA hopes to create a financial buffer to assist registered fishermen when needed. Most of the fishermen of Saba are part of the Saba Fishermen Association.





The background of the page is an underwater scene. The top half is filled with blue water and many small, white bubbles rising towards the surface. The bottom half features a large, textured coral reef structure in shades of orange and brown, extending from the left edge towards the center.

# 2 Findings

To evaluate the effectiveness of the management of the Saba Bank, relevant documentation was reviewed, and in-depth interviews were conducted. The resulting findings of this evaluation are elaborated on in this chapter.

This chapter addresses the following elements:

- ▶ Management Framework
- ▶ Execution of Tasks



# Findings in brief

Effective management of the Saba Bank is of utmost importance for the biological, ecological and economic wellbeing of the area. Our main goal was to assess the effectiveness of the current management structure. The focus was to assess how the Saba Bank is being managed within the current framework and how effective the management framework is in reaching overarching goals and objectives.

In this chapter, the findings are presented. To provide a brief overview and summary of this chapter, we answer the following questions based on the findings of this evaluation:

What are the experiences, perceptions and expectations of the SBMU by relevant stakeholders?

The interviews revealed that some stakeholders are unaware of the purpose of the SBMU and the way the unit is structured within the framework of managing the Saba Bank. The way the unit is currently structured (within SCF) perpetuates this lack of 'branding'. Furthermore, interviews concluded that different stakeholders prioritize different values within the Saba Bank.

What is the effectiveness of operations of the SBMU in relation to the TOR?

Some tasks from the TOR are not being executed efficiently, effectively or completely. For example, for the monitoring and research task, there are challenges in the collection of data. This affects the achievement of goals and objectives set in the different management plans. However, because of a lack of SMART tasks and KPIs, it is challenging to evaluate the extent of effectiveness of current operations. It became evident that the SBMU performs tasks outside of the scope of the TOR.

What is the clarity of the framework of the Saba Bank?

The way the management of the SBMU is organized is perceived as complex. The complexity of the organization is reflected by the relatively high number of different parties involved in the overall management of the Saba Bank. The interviews highlighted that, due to this inherent complexity, the respective relationships between the different stakeholders are not always clearly understood.

What is the efficiency of the current staffing, equipment and facilities of the Saba Bank?

Perceptions and opinions are divided whether the staffing is sufficient. This is because of the fact the SBMU also assists SCF from time to time, but there are insufficient KPI's and accurate logbooks to monitor their activities and efficiencies. Some tasks cannot be performed due to the fact of safety reasons (diving and patrolling). The boat is important for the SBMU. Currently, the boat is well maintained. Furthermore, the physical location of the SBMU office is ideal at the harbor, however the practical layout of the office does not support all tasks, such as monitoring.

What is the effectiveness of governance of the SBMU?

By jure, the Saba Bank management falls into a "governance by government" type, but some elements of the Saba Bank governance fit better into "shared governance". However, essential ingredients (negotiation, agreements, on-going innovation) are missing in order to be a successful shared governance. Governance can be more effective by adding essential ingredients.

Are adjustments necessary to the agreements within the current structure?

Multiple agreements within the current structure must be updated, described in more detail and formalized:

- ▶ Agreements between the Coast Guard and SBMU
  - ▶ Agreements between WMR and SBMU
  - ▶ Agreements with the SCF about "daily management"
  - ▶ Overall roles and responsibilities must be formally outlined in detail
- To eliminate ambiguity and inefficiency, clear roles, responsibilities and decision-making practices are needed and must be included formally detailed.

Are changes to the current structure necessary?

Our assessment revealed that the current management structure is no longer fit for purpose. The change in context over time and the lack of formal, detailed documentation has resulted in different interpretations and exposed the vulnerabilities of the current structure. Adjustments to the structure are necessary in order to effectively and efficiently manage the Saba Bank and achieve its overall goals.

Are there alternative structure(s) that could potentially be used?

Because the current management structure is no longer fit for purpose, alternative structures need to be explored. In the recommendations chapter, we will dive deeper into these alternative structures and their respective advantages and disadvantages. The structures include:

- ▶ Separating the unit from SCF
- ▶ As-is structure with crucial improvement points

# Assessment structure

Finding balance in understanding the management framework and executing the responsibilities according to this framework is key to effective management. However, while having the management framework is a start, the results of such a framework need to be assessed regularly to foster an adaptive approach, highlight problems, set priorities, or even promote better management policies and practices. Careful planning, implementation, and regular monitoring of a management framework are essential to improve its performance.

The focus of this assessment revolves around identifying the gap between the overall management framework for the Saba Bank and the execution of the management tasks by the different stakeholders, such as the SBMU. Throughout the following sections, the findings are presented across two dimensions;

- (1) The Saba Bank Management framework
- (2) The execution of tasks

## Framework to assess management effectiveness

### Management Framework

The Management Framework refers to the relationships and distribution of tasks, roles, and responsibilities among the Saba Bank stakeholders for managing the Saba Bank.

### Execution of tasks

This part considers the extent to which the management tasks are executed to achieve the goals and objectives outlined in the strategy dimension

### Stakeholder perceptions





## 2.1 Management Framework

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A clear strategy provides a sense of direction and outlines measurable goals and objectives and is therefore the starting point for evaluating progress.

**Structure follows strategy.** A well-established structure embeds ownership, governance, and oversight into the management of the Saba Bank. We refer to this as the Management Framework. This framework serves as a bridge between strategy and execution, and refers to the relationships, distributions of tasks and roles and responsibilities between stakeholders for managing the Saba Bank.

This part of the evaluation is focused on the management objectives and the extent to which the framework ensures the effective implementation of these management objectives.

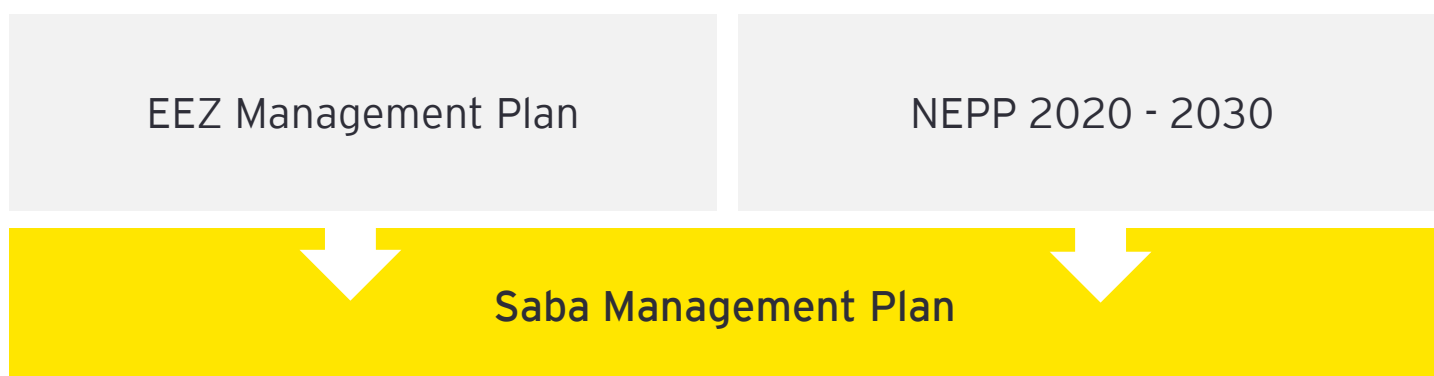
**Topics to be discussed in this section:**

- ▶ **Management plan:** Managing a protected area requires a well-established plan that encompasses the vision, strategy, and objectives that support and guide the management of the Saba Bank
- ▶ **Structure:** An adequate management structure is required to achieve the management goals and objectives for the Saba Bank. This management structure refers to the system that outlines how roles and responsibilities are organized and how the underlying activities are directed.
- ▶ **Governance:** Governance is about taking decisions and ensuring the conditions for their effective implementation. It is the process of developing and exercising authority and responsibility over time. It is about who takes decisions, and how, including in relation to learning processes and evolving institutions in society.
- ▶ **Funding:** To reach its full potential and preserve its history and natural wonders, the Saba Bank needs necessary support and funding.

# The Saba Bank Management Plan serves as the strategic lens

The first step in both the management and evaluation cycle is to understand the context. Protected areas are established to conserve special values, so understanding the significance of their values on a global or local scale is vital for both management planning and evaluation. Management planning will often set objectives aimed at safeguarding values, and evaluation of management results will be based on how successfully these values are conserved.

The basis for the Saba Bank management structure is the legislative framework as described in chapter 1.2. Within this framework, there are multiple plans and treaties such as the EEZ Management Plan and the Nature and environment Policy plan Caribbean Netherlands (NEPP 2020 - 2030) (See Appendix E). Each of these documents have their own goals and objectives. These serve as the overarching strategic lens through which effective management should be defined. The relationship between these documents is illustrated in the figure below:



The Saba Bank Management Plan is based on these plans. It outlines the purpose and way in which the Saba Bank is to be used and managed. It sets the management objectives and strategies to achieve the stated objectives. The Saba Bank management plan was first created in 2008, with the cooperation of multiple stakeholders. It was designed to be a working document that should be updated periodically with additional material to allow adaptive management as situations and issues change, management actions succeed, and legislation is updated.

# The EEZ Management Plan and the NEPP guide the Saba Bank Management plan

## The different vision statements and objectives

### EEZ Management Plan

Common sustainable management of marine biodiversity (the living and non-living resources), which includes the protection of species and habitats in the waters and on the seabed of the Dutch Caribbean EEZ and the zone between the borders of the island marine parks and territorial waters, with a particular focus on special areas such as Saba Bank and particular species

1. To take the steps needed to legally designate the Saba bank as a specially protected national marine area
2. To take all steps necessary to legally designate the Dutch Caribbean EEZ as a Marine Mammal Sanctuary
3. To install an EEZ Marine Resources Committee to guide the process of further management implementation and
4. To allocate the required core funding

### NEPP 2020 - 2030

A prosperous society and cultural identity in balance with a resilient and healthy natural environment

1. Reverse coral reef degradation to enhance wellbeing in the CN
2. Restore and conserve the unique habitats and species in the CN
3. Sustainable use of land and water for the development of the local economy
4. Create the local conditions to ensure sustainable results for nature policy in the CN

### Saba Bank Management Plan

To safeguard a natural area with a unique and spectacular biodiversity while ensuring long-term sustainable use of its rich natural resources and to contribute to the preservation of Saba's natural heritage and promote the sustainable use of the natural resources.

1. Dynamically manage the Saba Bank marine environment successfully as a nationally, regionally, and globally significant protected area, within an effective legislative framework and with commitment from stakeholders
2. Conserve a) the natural values of the marine environment and b) the cultural and historical marine resources of the Saba Bank through practical conservation and active management.
3. Ensure the promotion of the marine environment as a traditionally and contemporarily valuable, sustainable, multiple-use resource whilst establishing rules, guidelines and enforcing legislation for different users.
4. Ensure the involvement of the local community and stakeholders in order to cultivate a sense of partnership, improve the information base, and garner support for Saba Bank's zoning, regulations, and management practices.

# Actions and objectives in the management plan can be more specific

The EEZ Management Plan, NEPP 2020–2030, and the Saba Bank Management Plan all reflect an ambitious set of visions, objectives, and tasks towards the sustainable management of the Saba Bank. While the scope of each document is different, it is evident that there are some logical similarities between these plans. To put the ensuing findings into context, it is important to understand that the Saba Bank Management Plan is based on the EEZ Management Plan and is considered the main planning instrument for the SBMU Steering Committee.

When evaluating the management plan, the assessment was focused on the following questions:

- ▶ The coherence and structure of the strategy
- ▶ The use of the plan
- ▶ The management planning process of revising and updating the plan
- ▶ How the strategy is used across the different stakeholders

## The actions and objectives are not SMART, leaving room for misinterpretation

Formulating SMART objectives is an effective way to ensure clarity on agreements, priorities, and focus areas (see Appendix D for an elaboration). Neither the management objectives in the management plan nor the tasks in the TOR are formulated in a specific, measurable, achievable, timely (SMART) manner. Therefore, for certain objectives, it is unclear how they must be translated into specific action points and what the SBMU must do to achieve this objective.

Similar to the objectives, the action points outlined in the TOR are also not described in a specific, measurable, achievable, realistic, and timely manner. For example, for the task of "exploring opportunities for marine fauna restoration", it is not clear how much time should be used and who is responsible for this task. During the evaluation, it became clear that there is a disparity in perception among stakeholders regarding specific tasks and how they must be completed. The lack of SMART tasks can perpetuate the lack of accountability and clarity in practice, making effective operations more difficult to realize.

## A 4-year planning and evaluation cycle is adhered to; however, minimal updates have been made to the management plan

The management plan is the main planning instrument. Failure to adequately revise and update this plan may lead to blind spots when formulating further policies and executing tasks. Strategy setting should be a dynamic, complex, iterative and interactive process, by which a relevant problems are analyzed; objectives are defined and prioritized, activities to achieve those objectives are planned, and a measurement method is set to validate the progress.

The Management plan is designed to be an adaptive approach tool. This is mentioned in both the Saba Bank Special Marine Area Management Plan 2008 and the Saba Bank Management Unit Strategic Plan 2018–2023. This entails that the management plan must be periodically reviewed and updated. In practice, the plan is indeed updated every 4 years. However, the 2008 management plan and the 2018–2012 SBMU Strategic Plan are virtually the same document with little to no updates. While it is entirely possible that the plan still captures the most relevant themes and objectives, the priorities have shifted over the last 14 years.



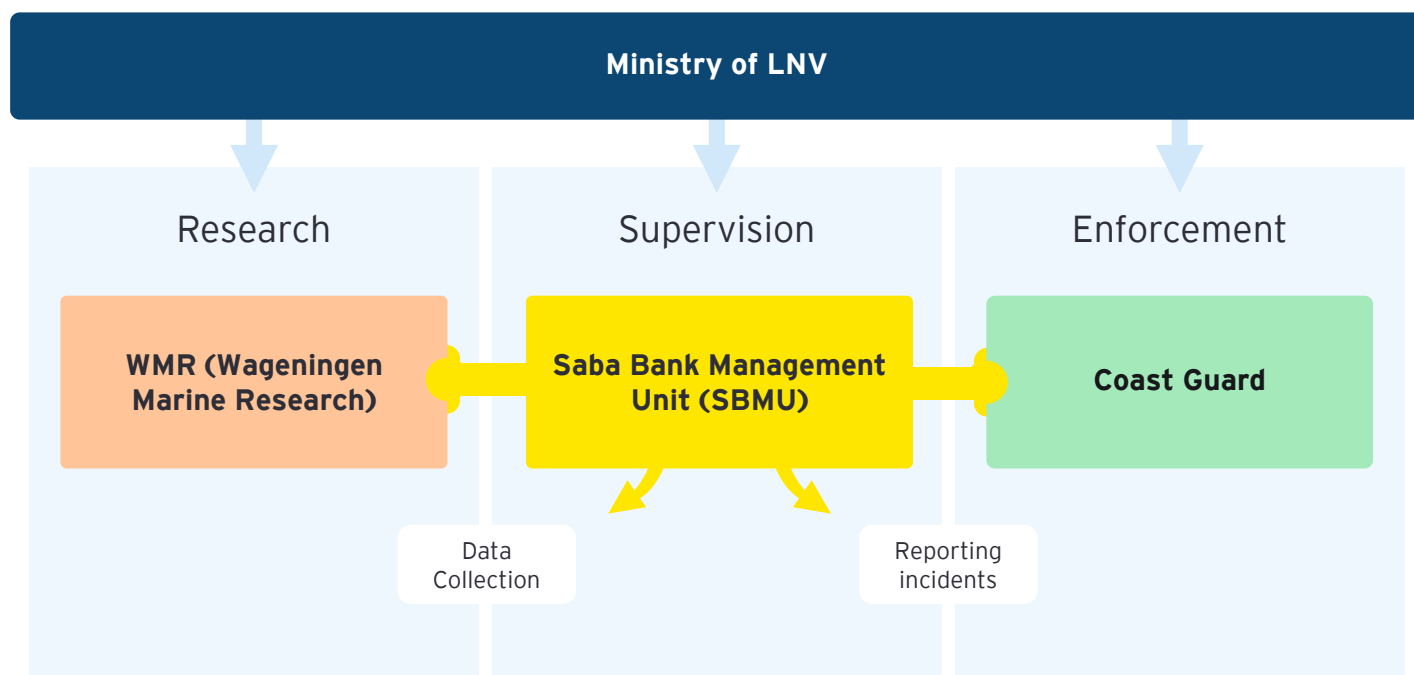
# The overall responsibility for managing the Saba Bank lies with the LNV

## Management structure of the Saba Bank

Based on the applicable laws within the legal framework (as described in chapter 1.2), the Ministry of LNV is ultimately responsible for the supervision and management of the Saba Bank. This responsibility consists of the following main tasks such as;

- ▶ **Supervision:** The Ministry of LNV is responsible for managing and supervising the Saba Bank
- ▶ **Monitoring & Enforcement:** Enforcing laws, regulations and policies on the Saba Bank
- ▶ **Research:** The Ministry of LNV is responsible for setting up a research agenda that is used for the conservation of the Saba Bank

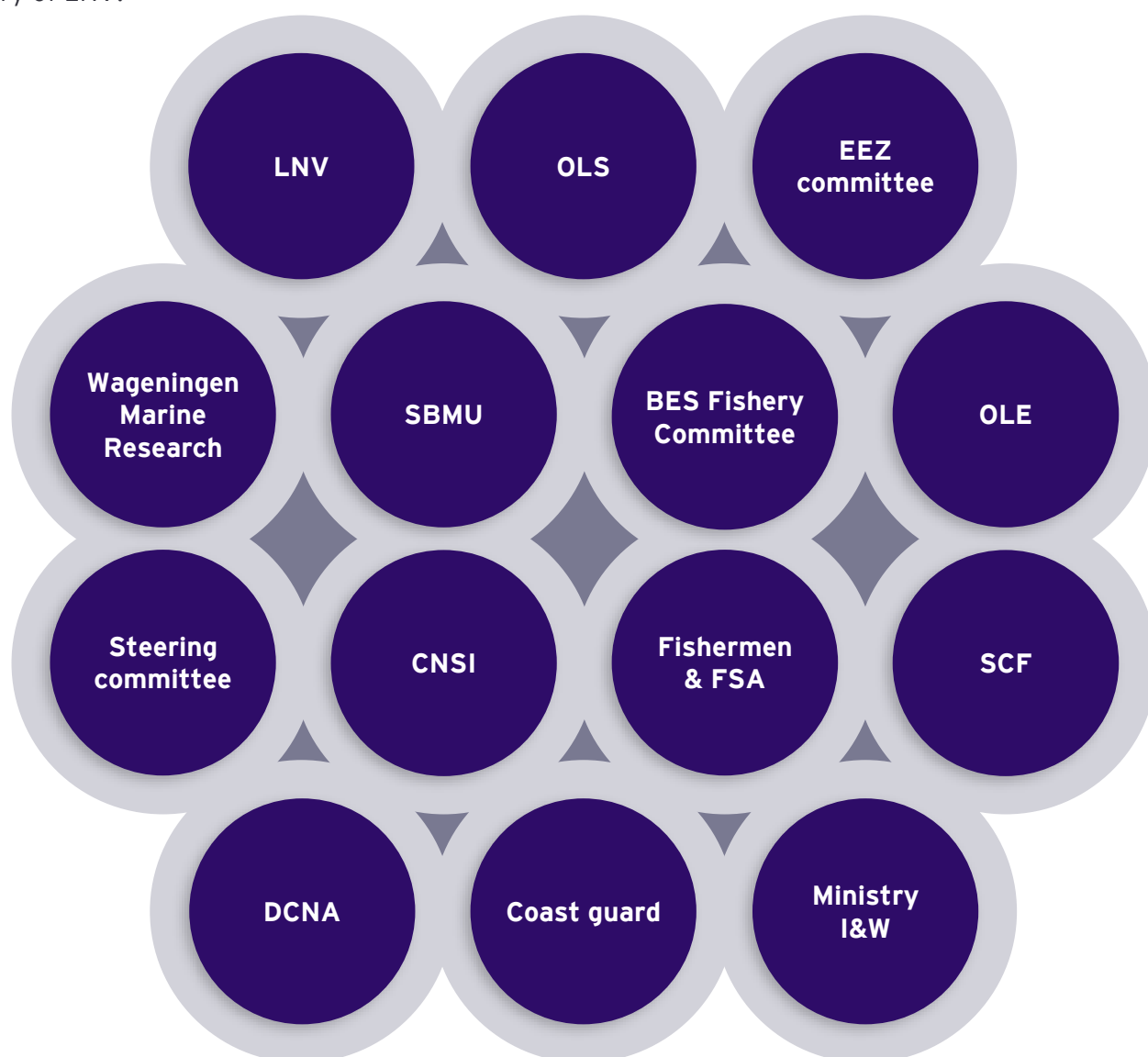
To carry out these tasks the Ministry of LNV cooperates with several stakeholders. There are several agreements in place and supporting documents that provide the basis for the execution of these tasks. A simplified overview of the structure and relations between actors can be found here:



The Saba Bank Management Unit (SBMU) is the vehicle used by the Ministry of LNV to carry out its supervision task. This is primarily done through the Saba Bank management plan and the TOR. Another important task for the Ministry of the LNV is to carry out research that feeds into policy setting. This is primarily done in cooperation with Wageningen Marine Research. The SBMU supports the research task with data collection and monitoring. The Ministry of LNV also has a responsibility for enforcement on the Saba Bank. The legal responsibility for the execution of the enforcement task lies with the Coast Guard'. The enforcement is done with periodic patrolling. The SBMU supports the Coast Guard with their own patrolling and reports any suspicious or illegal activity to the Coast Guard.

# However, many other stakeholders have a role to play in the management of the Saba Bank

As can be noted from the simplified overview on the previous page, the SBMU plays a central role in directly or indirectly facilitating the tasks of the Ministry of LNV. However, many other stakeholders play a role in the management of the Saba Bank. The Saba Bank stakeholder network includes several stakeholders who represent different interests. Some stakeholders such as the fishermen depend on the Saba Bank's resources, while others have different legal responsibilities for the Saba Bank, such as the Ministry of LNV.



## Limited collaboration with stakeholders in the management planning cycle

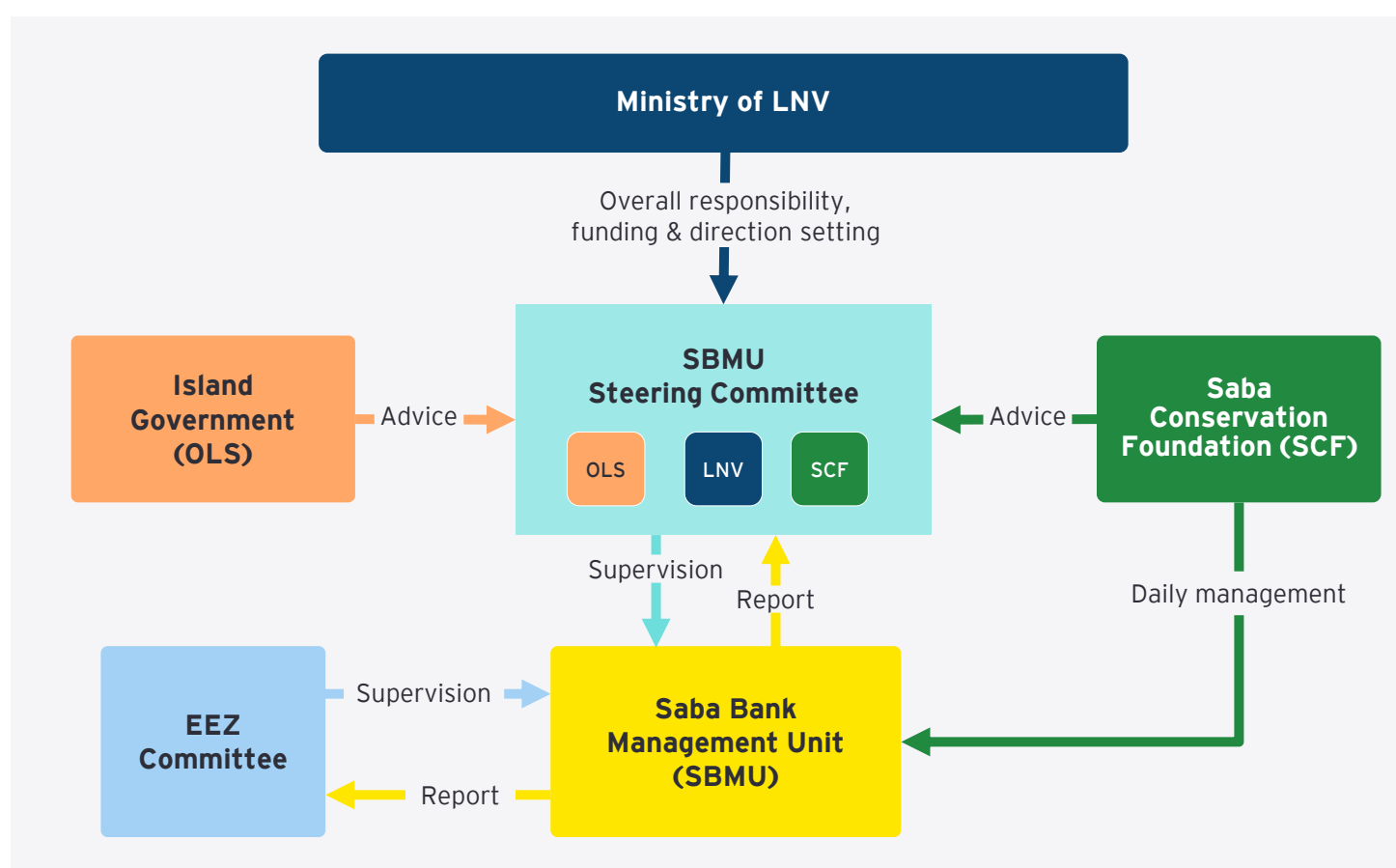
Stakeholders' involvement is crucial for all steps of management, including the strategy setting process. While the 2008 Plan was established with the collaboration of stakeholders (LNV, SCF, DCNA, OLS, independent researchers), the planning process is not being done with the involvement of stakeholders. The limited degree of collaboration with stakeholders during the process of formulating the Strategic Plan hinders the cascading of the strategy across all levels and between all stakeholders. This is substantiated by the fact that not all stakeholders are aware of an updated management plan. As a result, there is a limited shared sense of ownership and responsibility in terms of the strategic objectives across the stakeholders.

# The most important stakeholders around the SBMU sit in the steering committee

Each of these stakeholders has a role to play, however the following stakeholders are considered the most critical stakeholders around the SBMU:

- ▶ Saba Conservation Foundation (SCF)
- ▶ Ministry of Agriculture, Nature and Food Quality (LNV)
- ▶ Saba Bank Management Unit (SBMU)
- ▶ SBMU Steering Committee
- ▶ Public Entity of Saba (OLS)

The figure below provides a simplified overview of the structure and relationship between these stakeholders and the SBMU:



The LNV has entered an agreement with the SCF for the housing and management of the SBMU. The SCF is responsible for the day-to-day management of the SBMU. EY understood from the interviews that the Steering Committee was instilled to guide and supervise the SBMU based on the Management Plan. The composition of the steering committee reflects the input from the different key stakeholders:

- ▶ LNV: To ensure management plan is implemented and the resources allocated accordingly
- ▶ OLS: As the local government, capture the interests of the local community and align with local policy
- ▶ SCF: Report on the day-to-day management of the SBMU and resourcing decisions

The SBMU must report on its activities to both the Steering Committee and the EEZ committee. The LNV, SCF, and Island Government all have a chair in the Steering Committee. The Island Government ensures that SBMU programs are aligned with local policy and provides logistical support and advice.

# The EEZ committee also oversees the activities of the SBMU

As illustrated in the overview, the supervision of the Saba Bank is carried out through the SBMU. In fulfilling this supervisory role, the SBMU reports to both the SBMU Steering Committee and the EEZ Committee.

The figure below illustrates the role of both committee's and highlights the differences:

## Saba Bank Management Unit (SBMU) reports to two different committees

### The SBMU Steering Committee

- ▶ **Members:** representative of LNV (CN), representative of OLS, SCF Parks manager
- ▶ **Chair:** representative of LNV, who circulates a draft agenda before meetings
- ▶ **Purpose:** to set the Saba Bank management program and evaluate its implementation
- ▶ **Frequency of meetings:** according to the Agreement, they convene twice a year. According to the Terms of Reference, they must convene at least quarterly
- ▶ **Reporting:** the SBMU reports to the steering committee on a quarterly basis
- ▶ **Key documents:** TOR and Saba Bank Management Plan

### The EEZ Committee

- ▶ **Members:** representatives of Bonaire, Curacao, Saba, St. Eustatius and the Netherlands
- ▶ **Purpose:** to oversee the implementation of the EEZ Management Plan
- ▶ **Reporting:** the SBMU reports to the EEZ committee biannually
- ▶ **Key documents:** EEZ management plan



# Vulnerabilities exposed after shift in governance types

The International Union for Conservation (IUCN) and the Convention on Biological Diversity (CBD) distinguish four governance types for protected and conserved areas. These governance types are categorized according to the actors who take the fundamental decisions about them (actors that established them and decided their main purpose and management): (A) governance by government, (B) shared governance, (C) private governance and (D) governance by indigenous people.

## **De jure: Based on the legal framework, authority is held by governmental bodies**

By jure, the Saba Bank management falls into type A: governance by government. In this type, one or more government bodies hold the authority, responsibility and accountability for managing the protected area, determine its conservation objectives and develop and enforce its management plan.

In some cases, the government retains the overall control of a protected area and takes all major decisions but delegates the daily management tasks to other actors such as an NGO. Because the management of the SBMU is government-delegated to an NGO (SCF), it fits into the "governance by government" box.

## **De facto: In reality, authority is shared across several actors**

Although type A is the de jure governance type, in practice the management of the Saba Bank fits better into type B: shared governance. De facto, Saba Bank management could be considered shared governance, because the management of the Saba Bank is based on mechanisms and processes which share authority and responsibility among several stakeholders.

It is not uncommon for governance types to change over time. According to the IUCN, there has been a tendency for governments to decentralize responsibilities for protected areas and become more inclusive when identifying priorities, objectives and approaches.

## **Findings**

In order to be effective and successful, some key ingredients are needed for a shared governance. These essential ingredients are currently missing in the management of the Saba Bank, exposing vulnerabilities:

- ▶ **Negotiation process** (negotiation of agreements among governmental agencies and local rightsholders and stakeholders)
- ▶ **Co-management agreement** (describing roles, responsibilities and expected benefits and contributions from different parties)
- ▶ **Willingness of partners** to engage in the process of dynamic, on-going innovation, negotiation and adaptability

# In practice, the SBMU is an independent unit functioning as a department

## The original intention: A separate business unit

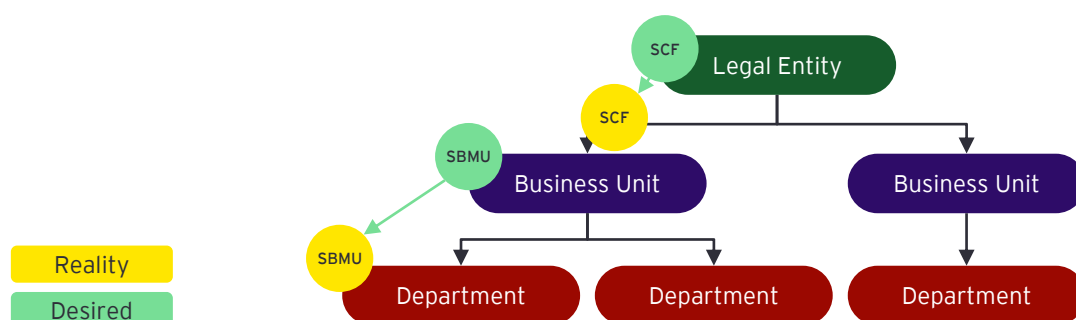
The SBMU was envisioned to be an independent functioning unit within the SCF entity. This set up was selected for several practical reasons such as cost-effectiveness and pooling of resources. Considering the size of the SBMU this construction was a logical one as it would allow the unit to benefit from other shared services such as payroll administration, but also the physical location (office space).

If you look at the structure in business terms, the SBMU was envisioned to function as a Business Unit. A Business Unit is usually a separate division within a legal entity (company) that implements its own processes and plans independent of the other units while still adhering to overall company policies.

## The current reality: A department

In the current reality, the SBMU functions more as a department rather than a sub-unit. A department is layer below the business unit. Multiple departments can be related to a single business unit. Currently, the SBMU operates in a way that is more interwoven with the rest of the SCF organization. This is due to various factors such as:

- ▶ **Size of the unit:** Due to the small size of the unit the SBMU shares-resources with the SCF
- ▶ **Similarity in objectives:** While the high degree of similarity between the purpose and objectives of the SBMU and the SCF allows for synergies it also makes the distinction of the SBMU and SCF less clear
- ▶ **Lack of independent manager:** The SBMU is managed on a day-to-day basis by the SCF Parks Manager. This implies that SBMU priorities and SCF priorities are intertwined.
- ▶ **No autonomous planning:** While SBMU workplan is based on the management plan and the TOR, as part of resource sharing with the SCF their daily work is not completely independent from the SCF planning



	Business Unit	Department
Mission and Objectives	Business units sometimes have their own unique missions and objectives	Departmental objectives are determined based on unit or corporate objectives
Planning	Business units plan their activities autonomously from other business units	Departments planning is derived from business unit and entity planning
Revenue and cost tracking	Business units typically track their costs and revenues separately from the parent company	On the departmental level, costs and revenues are usually consolidated with other departments
Leadership structure	The unit manager oversees and maintains operations, and typically reports to the parent company less frequently	Department managers operate less independent and exist under the control of the unit managers

# The management framework does not always work in practice

## **The Management Framework is not clear to all stakeholders**

The way the management of the SBMU is organized is perceived as complex. The interviews highlighted that, due to complexity of the framework, the relationships between the different stakeholders are not always clearly understood. There were some discrepancies between the views gathered via the interviews and the framework as described in the documentation. Several stakeholders question whether the number of layers supports the effectiveness of operations.

More specific, the agreement between LNV and SCF in accommodating SBMU is unclear to many of the stakeholders. Some perceive the unit to be part of SCF while others know that SBMU is working for LNV. The difference in perceptions may be because the rationale behind the chosen structure is unclear.

Based on the interviews, EY understood that the current structure of placing a unit within an existing NGO was chosen because of the following reasons:

- ▶ Availability of functioning management systems
- ▶ Sharing of skills, expertise and equipment
- ▶ Cost-saving
- ▶ Existing physical office space

To make such a structure successful in such a context clear and explicit agreements are needed.

## **Several bottlenecks impede proper functioning of the Steering Committee**

For the steering committee as the entity responsible for setting directions for the management of the Saba Bank, it is important that regular consultations take place, in which results are discussed and bottlenecks are addressed. Currently, the steering committee meets once every quarter (in practice this is twice a year). Based on the nature of the topics discussed, the number of decisions to be made and the number of stakeholders involved, frequent reporting is needed to maintain oversight. Furthermore, there is no formal and structured agenda set during the

meetings.

Reports should be sent before every Steering Committee meeting, but this does not happen.

This results in a difficulty of 'steering'.

## **Specific and practical formal agreements are lacking in different areas of the LNV, SCF and SBMU arrangement**

Having the SBMU within the SCF organization provides many benefits for the SCF. The impact of the work is increased, with the enhancement of the visibility and legitimacy of the SCF as a result. Staff of the SBMU also assists the Marine Park officer with several tasks in the field by the pooling of resources. However, there is a feeling among stakeholder that the cross-cutting arrangements may at times be too informal and more time is spent on non-Saba Bank related tasks.

Furthermore, the interviews also revealed that there is a disparity in opinion on what the SCF's daily management task entails. Examples were mentioned such as the decision on the use of the boat. It can be concluded that it is not always clear which decisions fall under operational decisions (daily management) and which decisions fall under strategic decision (overall management) and has led to discussions between the commissioning party ("Opdrachtgever") and contractor ("Opdrachtnemer"). This is also not formally defined. While efforts have been made to define the decision-making mechanisms, a lot is left to interpretation. This has led to instances of conflict and discontent in the past. This lack of clarity on supervision and reporting lines inhibits timely decision making. The Steering Committee and the SCF is in the process of defining these tasks, and a draft document has been established. However, this has not yet been approved pending the results of this evaluation.

# Stakeholder perceptions

To understand stakeholder experiences the stakeholders were provided with the opportunity during the interviews to share and provide their perspective on some of the main successes and pain-points of the Saba Bank management structure and the SBMU. Overall, the general stakeholder feedback provides a clear picture of some of the bottlenecks of the current state. Some key statements are highlighted below:

“Saba is too fragmented at the moment, we need to act more together ”

“SBMU must be separated from the SCF”

“If we remove the SBMU from the SCF, a very important pillar of support for the SCF will be lost”

“There are too many chiefs. A ship can only have one captain”

“Cooperation is important because parties need each other”

“For projects, the HOW must become clearer”

“The relationship between SCF and SBMU is a bit vague”

“SBMU should be more independent: LNV should interact directly with the SBMU ”

“LNV must take more time for management of Saba Bank”

“In general, steering committee members do not understand what their role is”

“Transparency is key: it is a small community ”





## 2.2 Execution of Tasks

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### Daily activities contribute to achieving goals

Having a profound strategy and a suitable governance structure is the foundation for effective management of the Saba Bank, but only solid execution represents success. To evaluate the effectiveness of the management framework, both inputs and outputs must be considered and evaluated against the set goals and objectives.

In this section, we will zoom in on LNV's Saba Bank Management tasks which are executed through the SBMU, and other stakeholders such as the Coast Guard and Wageningen Marine Research. EY will elaborate on how these tasks are executed against how they are intended to be executed.

#### Topics to be discussed in this section:

- ▶ **Monitoring & research:** One of the most important objectives of the SBMU is to observe and monitor the Saba Bank and collect adequate data for research purposes.
- ▶ **Enforcement:** The Saba Bank needs to be managed through legal or other effective means to achieve the long-term conservation of nature with associated ecosystem services and cultural values.
- ▶ **Tasks vs. execution:** This is a list of actionable items that need to be performed by the stakeholders in order to achieve the goals and objectives of the Saba Bank.

# The SBMU supports both the monitoring and enforcement task

## Monitoring & Research

As part of the management of the Saba Bank, the Ministry of LNV commissions its research task to Wageningen Marine Research (WMR). WMR has been conducting and assessing the fisheries on Saba by order of LNV.

Through its monitoring program, the WMR aims to conduct research and provide advice for both sustainable ecosystem health and optimal fish yield management. WMR set up and ran a data collection system until 2017. Since then, fisheries monitoring on the Saba Bank is being done by the SBMU. Data is being collected on catch, effort, species composition and length frequency of the fishery. The data is currently being collected through:

- ▶ Surveys and biological sampling at the landing site
- ▶ On-board data collection by the SBMU officer

### Current state finding: Ineffective data collection

According to the WMR, the port sampling data collected has not proven necessary to develop reliable analyses. A recent WMR study highlighted several improvement areas:

- ▶ The man-hours of the Data Management Officers (DMOs) need to be increased
- ▶ Provide local DMO's proper data collection training
- ▶ A closer relationship between the WMR and local DMOs on Saba
- ▶ Fishermen awareness on the importance of the data collection



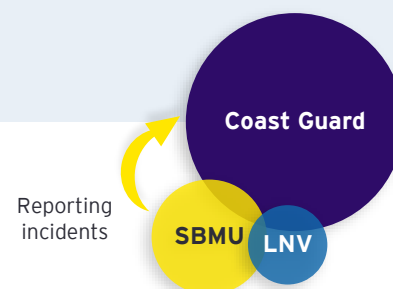
## Enforcement

For the management of marine biodiversity and fishery for the Exclusive Economic Zone, enforcement is carried out. Since 1996 the enforcement task and authority has been under the direct control of the Coastguard.

The Coastguard uses the Automatic Identification System (AIS) on Saba to perform surveillance tasks. According to their annual plan, the Coast Guard must be physically present on the Saba Bank at least 10 times a month. Because of this limited time period, they rely on the SBMU as their 'eyes and ears'. SBMU does not have any enforcement authority, right or capabilities, so they report violations to the Coast Guard.

### Current state finding: lack of patrolling and enforcement

The current patrolling and enforcement of the Saba Bank is not being done according to what was planned in the Saba Bank management plan. The 10 days that the Coastguard is present at the Saba Bank is insufficient for the necessary patrolling of such a large territory of water. The SBMU highlights that they perceive the patrolling task as conflicting with the task of maintaining a good relationship with the fishermen.



# In the current context, the SBMU is not able to effectively perform all tasks outlined in the TOR

## Workforce

The SBMU consists of three staff members: a program officer, technical officer and assistant park officer. They all have different tasks according to the TOR (Appendix F). Next to these tasks, the SBMU resources also support the SCF on a regular basis. The intention for accommodating the SBMU under the SCF was the pooling of resources. In practice, the SCF and the LNV tend to disagree on how resources are being used.

The table below outlines the tasks specified in the TOR. Alongside is the assessment of the way these tasks are currently executed:

Legend		
Not executed in reality	Partially executed in reality	Executed in reality
Task	Execution (reality)	
Going out on the Saba Bank at least 3 times weekly (circumstances permitting at the discretion of the SCF Parks Manager)	In practice, the SBMU is not able to always complete this task according to the TOR with the current formation. Instead of going out on the Saba Bank 3 times weekly for patrolling, there were instances where it is done 3 times a month. the assessment has shown that this is the case because of safety measures that prevent the Captain to patrol the Saba Bank by himself. This must be done together with another officer. Next to this some stakeholders indicate that this is also because the SBMU resources are used for other purposes and the small size of the team. Currently, the unit only patrols the Saba Bank when it can be combined with other tasks. The notion behind this approach is to save fuel, money, and time.	
Actively promoting sustainable fishing practices.	The SBMU regularly communicates with the fishermen in the harbor when collecting data. It was indicated that during these conversations, sustainable fishing practices are promoted. However, no other form of promoting sustainable fishing practice was identified.  There is also no concrete plan for this task that discusses the promotion tactics and key stakeholder groups.	
Liaising and consulting with fishermen in regular meetings and engaging them in the management	There are no formal meetings with the fishermen. SBMU is in contact with the fisherman when collecting data, but the fishermen are not involved nor engaged in the management of the Saba Bank in a structural way. The fishermen have indicated their desired to be consulted more often throughout the development of the rules and regulations regarding the management of the Saba Bank, because they believe that they have the knowledge on how fisheries work on Saba Bank.	

# On other areas the SBMU is more successful in executing the tasks

Task	Execution (reality)	
<b>Exploring opportunities for marine fauna habitat restoration.</b>	<p>The exploring of opportunities for marine fauna habitat restoration happens in collaboration with Wageningen Marine Research. Examples are the sea urchin project or the artificial reef project. However, these projects are for the Marine Park - not the Saba Bank. This is not included in the TOR.</p> <p>This is also a task where the SBMU is sometimes limited in their ability to execute with the current capacity. For example, for these studies the SBMU personnel must go out for diving. Currently, diving must be done with the entire SBMU: at least 2 divers (expert-level, this cannot be done by interns) and the captain that stays on the boat. This implies that all other projects or activities must be put on hold when the team goes out for a dive. The SCF and the SBMU share resources to conduct tasks while complying with these safety measures.</p>	
<b>Monitoring of fish landings and regular on-board observations on fishing boats.</b>	<p>In terms of data collection, several challenges have been highlighted. In a recent WMR study report on the data collection shortcomings, several key challenges were highlighted. In this study the WMR concluded that after 10 years of monitoring and research there are still gaps in the data. The WMR indicates that the data collected has been insufficient to produce reliable study results on the state of the fisheries and the stock of the Saba Bank. The challenges mentioned in this report include the unwillingness of the fishermen to participate in the data collection and the Data Management Officers (DMOs) being unable to fully commit to this work. These findings were endorsed in the interviews. However, there are no formal agreements that state the DMOs must commit a certain amount of time to this research tasks. WMR currently does not have any formal or written agreements with the DMOs, nor the authority to give directions to them. During the stakeholder interviews, both the WMR and SBMU indicate that a more structured process for data collection may be needed.</p> <p>The monitoring of fish landings happens every day in the harbor. With the physical logistics of the current Harbor facilities the SBMU does not always have a clear view of the harbor where fishermen arrive with their catches. Instead of immediately seeing and acting when ships arrive with their catches, they must walk out of their workspace a few times per hour to get a view of incoming fishermen. On the other hand, on-board observations happen on a weekly basis. However, these on-board observations work on a voluntary basis and not all fishermen always cooperate.</p>	



# Overall, some tasks can still be better specified

Task	Execution (reality)	
Reporting on violations of the fishery regulations to the proper authorities (incl. coastguard, police, public prosecutor)	<p>When violations are identified on the Saba Bank, the SBMU reports them primarily to the Coast Guard. However, timely response from the Coast Guard is not always possible due to the physical distance. The Coast Guard is based in St. Maarten, meaning they must sail to the Saba Bank to handle these reports. This evaluation also revealed that there is a perception that the Saba Bank is not always the priority of the Coast Guard. Therefore, the effectiveness of these reports is not a given. Furthermore, a follow-up on the resolution of these reports is currently not provided by the Coast Guard.</p> <p>From the SBMU's perspective, the monitoring and supervision task is perceived to be conflicting with their role in collecting data for research and with the task of maintaining a good relationship with the fishermen. Monitoring and reporting violations to the coast guard inherently adds tension to the relationship between the SBMU and the fishermen. This was also noted during interviews with local fisherman and SBMU staff members. However, while challenges such as structural communication remain, the SBMU currently does maintain a good relationship with certain fishermen.</p>	
Establishment and maintenance of database, administration and monthly reporting to steering committee on activities	The database has been created. The reports are written quarterly instead of monthly. Sometimes this happens every 6 months instead of quarterly.	
Boat and equipment maintenance	<p>The maintenance of the boat is done by the technical officer/captain. The assistant program manager assists the technical officer when needed.</p> <p>EY understood from the interviews that there has been a lot of improvement in the execution of this task over the past few years.</p>	
Maintenance of research equipment deployed on the Bank	The maintenance of research equipment deployed on the Bank is often combined with patrols. Consequently, the patrolling often happens on a limited area of the Bank (where the research equipment is located). How often the research equipment is maintained depends on the project.	

## And translated to the individual tasks of the individual officers

Task	Execution (reality)	
Monitoring of relevant parameters in accordance with the Monitoring Plan for CN and as directed by the Steering Committee	The assessment revealed that the Monitoring Plan for CN has not been known and read by the SBMU. However, the monitoring of relevant parameters happens on a regular basis. For example, the marine traffic, fishing efforts, shark bycatch, marine mammal presence etc.	
Establish and carry out public awareness and sensitization programs on better use of the natural resources of the Saba Bank	The content and planning of public awareness and sensitization programs are not defined and there are currently no plans to execute them. Around 2019, the Saba Bank had some media presence (Facebook, YouTube, podcasts). However, this no longer is the case.	
Maintaining good communication links with the Dutch Caribbean Coast Guard	<p>As mentioned by both the Coast Guard and the SBMU, the relationship between them is good. However, seeing the important role that both stakeholders have concerning the monitoring and enforcement of the Saba Bank, clear and formal agreements are needed between the two. A Formal agreement will highlight clear tasks and responsibilities which are currently lacking. Evident after conducting interviews, there are mostly informal agreements between the Coast Guard and the SBMU. The coast guard indicated that they would like to see more formal agreements between the SBMU and the CG.</p> <p>The SBMU indicates that they miss a feedback system in regards to the reports.</p>	

## And translated to the individual tasks of the individual officers

Task	Execution (reality)	
Assisting in the logistics of approved scientific research projects on the Saba Bank	The SBMU assists in the logistics of multiple research projects, often led by Wageningen Marine Research.	
Assisting in the implementation of the Yarari Marine Mammal management plan	The management plan still needs approval. When the plan is approved, the SBMU, together with Saba Marine Park, will assist in the implementation of the plan. However, clear tasks and responsibilities still need to be identified.	
Reporting quarterly to the steering committee and the EEZ committee	Reporting happens, but less regular than in the Terms of Reference. It often happens biannually instead of quarterly.	

Based on our findings regarding the tasks from the TOR, it can be stated that not all tasks are effectively performed. This is because of various reasons, such as safety regulations. Some tasks, such as boat maintenance, are performed successfully. Overall, certain tasks (like the promoting of sustainable fishing practices) can be better specified and translated to the individual tasks of the officers.

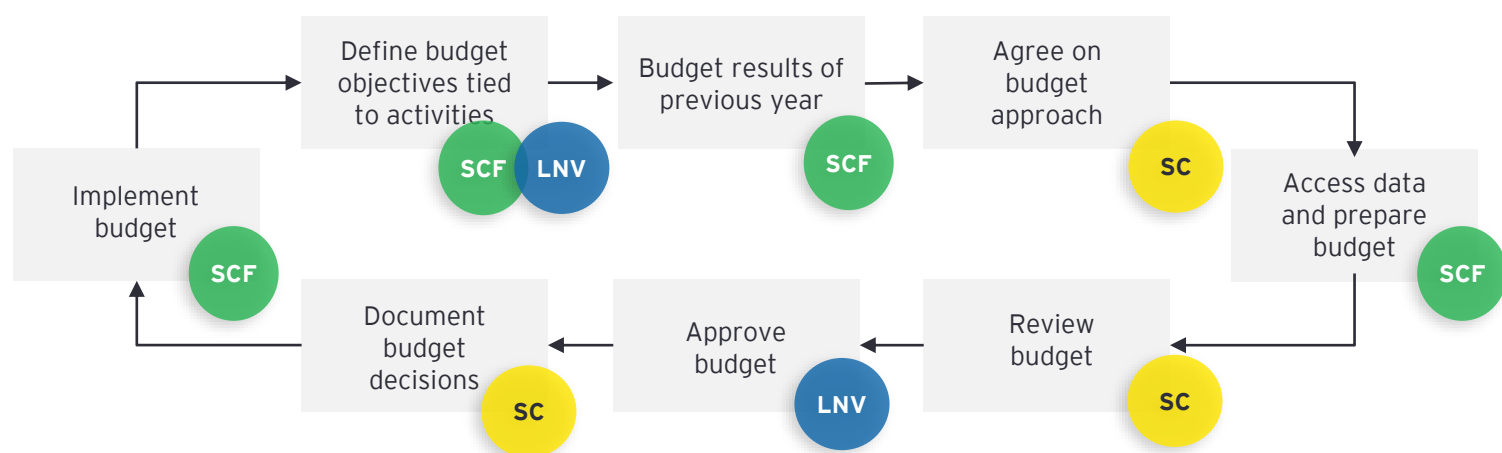
# The management planning cycle can be improved

## The link between management planning and budgeting is not clear

While policy and budgetary decisions are centralized in the Netherlands (LNV), the tasks are primarily executed by the stakeholders in the Dutch Caribbean. According to the agreement between the SCF and the LNV, all resources are allocated to the SBMU via the SCF for the execution of the tasks and for the associated personnel costs. According to the 2022 budget, an amount of 228,800 USD has been made available for the execution of the agreement.

During the interviews it was mentioned that the annual budget is currently prepared by the SCF Parks Manager and approved by the Ministry of LNV. The budget is based on an original budget template prepared by the LNV under the original agreement. The SCF Parks Manager makes minor adjustments to the budget based on developments such as inflation, fuel cost developments and expected maintenance expenditures. EY obtained a copy of the budget that was submitted for 2022. Based on the Steering Committee meeting minutes provided, EY concluded that there are no structural budget reviews. Except for the discussion on leftover budget from 2020, there is no clear agenda setting in the Steering Committee when it comes to budget approval. Furthermore, there is no structural monitoring on how these costs relate to the different tasks of the SBMU.

The figure below provides an overview of the SBMU's financial budgeting process, and the stakeholders involved:





# Stakeholder perceptions

As seen in Appendix C, the individual tasks of the officers are not completely aligned with the general tasks. Some general tasks are not included in the individual tasks. For example, it is unclear who is responsible for the task 'Establish and carry out public awareness and sensitization programs on better use of the natural resources of the Saba Bank'. This lack of clarity about responsibility may prevent this task from being carried out. Below are some key statements highlighted below:

“SBMU doesn’t even know what their job is”

“Effective management = everyone understands what the SBMU does and especially *the why* behind what they do”

“Managing the Saba Bank: what is there to manage?”

“Processes for data collection and communication are not documented, but there are some protocols. ”

“More manpower and seniority is needed”

“Awareness is success: people must know what the Saba Bank Management entails and what the SBMU does”

“The local community does not know about the SBMU. They know the SCF, but not the SBMU, they don’t see the difference ”

“Saba Bank is as big as province of Utrecht, bigger than the Dutch Waddenzee, and you have 3 people monitoring it”





# Recommendations

This chapter provides the foundation for the future of managing the Saba Bank. Key improvement points will be discussed alongside possible adjustments to the current structure. Each scenario's advantages and disadvantages will be discussed. This chapter concludes with EY's overall recommendation.

## 3.1 The way forward

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As the entity ultimately responsible for the management of the Saba Bank, the Ministry of LNV is responsible for acting and ensuring that improvements are realized. After all, the Saba Bank is a park worth protecting.

Based on the findings of this study, it can be concluded that there is room for improvement when it comes to effective management of the Saba Bank.

This chapter will first address the general improvement points in detail. Subsequently, two alternative structures for the future will be proposed. This will include an elaboration on the advantages and disadvantages of both scenarios.

The following improvement points should be the basis for the new Saba Bank management:

**1 Strengthen the planning process for alignment and define specific goals and tasks**

**2 Document and formalize detailed agreements with stakeholders**

**3 Define roles and responsibilities (RACI) for all stakeholders**

**4 Optimize the steering committee**

**5 Optimize the current structure for effective management by the SBMU**

Adjusting these crucial points is the foundation for the thriving of the Saba Bank—without taking these points into account, managing the Saba Bank will be challenging. These improvements will be discussed throughout the following pages.



## 1 Strengthen the planning process for alignment and define specific goals and tasks

This study revealed that the management planning cycle can be improved and that the actions and objectives in the management plan can be more specific and coherent.

An updated and adequate Management Plan, of which the importance is recognized, and the content is sufficiently supported, can be a guidebook for effective operations. A simple plan, focused on a limited number of long-term objectives, would enhance the relevance and utility of this document. For the Management Plan, the following aspects, at minimum, should be considered

1. **Formulation of objectives:** Currently, the goals are not formulated in a mutually exclusive and collectively exhaustive (MECE) manner. This implies that there are overlaps, which hamper the ability to communicate the objectives in a persuasive manner to stakeholders. In addition, overlapping goals make it more difficult to translate goals to activities such that the activities cover the complete scope of the objectives. Redefining the goals in a MECE way will ensure persuasive communication of the goals and make them easier to translate into objectives and tasks.
2. **Specification of tasks:** The majority of the tasks described in both the Terms of Reference and the Strategic Plan are not formulated in a specific, measurable, achievable, realistic, and timely (SMART) manner. See Appendix D for a more detailed elaboration. SMART is an effective tool that provides clarity, focus, and motivation needed to achieve objectives and tasks. During the interviews, it became evident that where certain parties see success, others see failure. Due to the lack of SMART objectives, many discussions around performance and effectiveness are based on subjective sentiments rather than facts. The way forward would be to include the SMART framework when creating the new Management Plan.

Effective planning and management are directed towards the achievement of objectives. Management planning should be adaptive: it should be periodically reviewed and updated as a result of monitoring. It is important that enough time and effort goes into updating the new Management Plan. In addition to the management plan the management planning process can also be strengthened. For example, a clear plan including actions around actively promoting sustainable fishing practices. Such a plan could include what can be promoted and how this will be promoted.

Considering the complexity and size of the stakeholder network, the Management Plan and its content should be developed through a collaborative process that engages all stakeholders. Another important prerequisite is the alignment of the Plan with the NEPP 2020-2030.

## 2 Document and formalize detailed agreements with stakeholders

For the successful execution of operations, it is essential that stakeholders are well managed. This becomes even more important in an intricate network, such as the case with managing the Saba Bank. When stakeholders feel that their views and concerns are being heard and considered, and they feel ownership of it, they are more likely to support the management of the Saba Bank. Stakeholders are important because they can support and sustain the management of the Saba Bank. They can be potential partners—or threats—in managing the Bank. This evaluation revealed that, mainly due to the complexity of the stakeholder network, the management framework currently does not always work in practice with the current agreements.

### Improve stakeholder communication and involvement

An important element of stakeholder management is communication. Communication helps improve understanding of the process and preempts any misinformation about how management may affect stakeholders. It also improves trust between stakeholders, which is a critical variable for collaboration and maintaining support for the management of the Saba Bank.

Our assessment concluded that the current communication mechanisms and agreements do not optimally support the communication needs between the different parties, hindering clarity regarding expectations, roles and responsibilities as well as decision-making. Implementing the aforementioned improvement steps (involved in creating a Management Plan by documenting processes, roles, responsibilities, and agreements) is the first step in involving stakeholders. However, initial involvement will not be sufficient to properly manage stakeholders. More sustainable and frequent involvement is necessary for efficient operations:

- ▶ In line with the recommendations of the July 2022 report with WMR, closer involvement should be arranged of WMR in work planning for the island DMOs. This way, expectations can be managed.
- ▶ Agreements and communication moments between the coast guard and SBMU should be formalized.
- ▶ Currently, there are no public awareness programs. The public and tourists need to be included in the drafting of the plan for the future management of the Saba Bank.

EY also recommends the introduction of a periodical stakeholder analysis to reclassify the stakeholders and determine the appropriate stakeholder engagement strategy. This might include revisiting the frequency, format and content of stakeholder communication actions to ensure that stakeholder involvement reflects the priorities.

### Define formal agreements among stakeholders

Once specific goals and tasks are defined, performance can be better evaluated using KPIs. This study highlighted several areas where responsibilities are based on customs, assumptions and gentlemen's agreements rather than specific and formalized documented agreements. This includes the daily management of the SCF, the individual tasks of the SBMU, the data collection process, and the patrolling and enforcement agreements. This is one source of many differences in perceptions. Regardless of the chosen structure, agreements with key stakeholders such as the SCF, the Coast Guard and the WMR should be worked out in detail to align expectations and improve the effectiveness of the different core tasks.

A formal documentation of processes and agreements will provide better insight into the efficiency and effectiveness of current operations and will facilitate knowledge sharing. Once agreements are formalized, processes mapped out and documented, the Saba Bank management decisions can be based on facts rather than perceptions. For example, resource gaps can be assessed, and Key Performance Indicators (KPIs) will allow the LNV to get a better overview of how the SBMU and its stakeholders are performing at any given time.

### 3 Define roles and responsibilities for all stakeholders

After documenting and formalizing agreements, processes and KPIs, responsibilities and accountabilities for each of the processes must be revised and allocated. This evaluation concluded that there are several areas where there are discrepancies in perceived responsibilities. For example, the role of the local government (OLS) is not clear and understood for all parties, and the daily management task discussion between the SCF and the Steering Committee.

Defining clear roles, responsibilities and decision-making practices provides clarity, eliminates confusion and prioritizes communication between stakeholders. One way of doing so is to use the RACI tool. This tool is used to understand and analyze who in the organization and stakeholder network is doing what. It can be used to achieve role clarity, identify duplication, and identify blockages caused by unclear or inappropriate role definitions. RACI stands for:

<b>R</b>	<b>Responsible, 'doer'.</b> The individual(s) who perform(s) an activity - responsible for action/implementation. Responsibilities can be shared.
<b>A</b>	<b>Accountable, 'buck stops here'.</b> The individual who is ultimately accountable. Including yes/no authority and power of veto. Only one 'A' can be assigned to an activity or decision.
<b>C</b>	<b>Consulted, 'in the loop'.</b> The individual(s) to be consulted prior to a final decision or action being taken. Two-way communication.
<b>I</b>	<b>Informed, 'FYI'.</b> The individual(s) who need(s) to be informed after a decision or action is taken. One-way communication.

Applying this method helps to improve organizational efficiency and effectiveness because it can provide clarity on roles, responsibilities, accountabilities, and handoffs between stakeholders and individuals. An example of a RACI tool can be found at the bottom of the page. Having these responsibilities, accountabilities, and agreements documented will help stakeholders with clarity on their respective roles and responsibilities and overall clarity of the framework.

Activity	Stakeholder 1	Stakeholder 2	Stakeholder 3	Stakeholder 4
Activity 1	I	R	A	C
Activity 2	A	R	I	I
Activity 3	A	R	C	C
Etc.	I	A	C	R

## 4 Optimize the steering committee

Our assessment concluded that several bottlenecks impede proper functioning of the Steering Committee. The purpose of a steering committee is to make sure activities are aligned with overall objectives, progress is monitored, changes in budget are approved, and conflicts are resolved. As our findings concluded, the current functioning of the steering committee is not optimal for achieving overall goals. We recommend improving the steering committee on the following points:

### 1) Include the necessary stakeholders

For the steering committee to effectively steer it is important that the committee represents the main stakeholders of the Saba Bank. With the Saba Bank's intricate network of stakeholders, it is important that various stakeholders are represented within the steering committee. Currently, not all stakeholders are represented in the steering committee (such as the Coast Guard or WMR), which can be unfavorable to overall support and involvement in the management of the Saba Bank. Since the steering committee plays an important role in the decision-making process of the Saba Bank EY recommends to include stakeholders that could be affected by decisions to be made or have an important role in the execution of the Saba Bank Management. Therefore, we recommend increasing the involvement of Wageningen Marine Research and the Coast Guard in the steering committee. This might be in the form of adding new members or finding ways to have more input from these stakeholders.

### 2) Evaluate the frequency of steering committee meetings:

In order for the effectively steer the frequency of the meetings should be evaluated. Based on the scope and decisions to be made the frequency should be determined. This could be connected to SBMU's KPI's and milestones.

### 3) Set clear responsibilities

In line with the RACI principle, clear roles, responsibilities, and decision-making practices for the steering committee should be defined.

### 4) Determine a (fixed) agenda

The steering committee meetings must be organized and structured. A (fixed) agenda will give participants a clear outline of the topics that will be discussed and the topics they should prepare for. The meetings will operate at a higher level of efficiency if agendas are pre- determined and communicated up-front.



## 5 Optimize the current structure for effective management by the SBMU

The evaluation concluded that there are different perceptions and interpretations of daily management by the SCF. As highlighted in the study, the reality is that the SBMU is an independent unit functioning as a department within the SCF. Since the SBMU is not a legal entity, the employees of the unit are officially employees of the SCF, and not LNV. This construction implies certain responsibilities from the SCF towards the SBMU employees. This construction also causes a lack of clarity on the management responsibilities regarding the SBMU, between the different parties. For the SBMU to effectively execute its roles and responsibilities, EY recommends the following 2 options:

1. Optimize the current structure by implementing improvement points or
2. Segregate the SBMU from SCF

### 5.1 Optimize the current structure by implementing improvement points

For the SBMU to effectively execute its roles and responsibilities, EY recommends the following improvements:

- A. Introducing a manager for the SBMU:** Currently the SCF Parks Manager is tasked with the day-to-day management of the SBMU. However, the SCF Parks Manager does these management tasks besides his responsibilities of the SCF. Based on multiple interviews, it became evident that the SBMU is lacking a dedicated manager. Therefore, EY recommends introducing a dedicated manager for the SBMU. This manager will be entrusted with the responsibility of guiding and directing the organization to achieve its goals. This dedicated manager can administer and coordinate resources effectively and towards successful accomplishment of the goals of the organization.
- B. Specify daily management role of administration:** Considering the disparity in interpretations, EY is of the opinion that, in line with the previous recommendation on roles and responsibilities, the daily management roles must also be specified.

#### Example management task division for illustration purposes

Administration	Daily Management	Supervision
<ul style="list-style-type: none"> <li>▶ Administrative responsibilities</li> <li>▶ Recruitment &amp; selection</li> <li>▶ Housing</li> <li>▶ Health &amp; safety</li> <li>▶ Benefits &amp; compensations</li> <li>▶ Pension</li> <li>▶ Development of company policies</li> </ul>	<ul style="list-style-type: none"> <li>▶ Implementing policies made by management</li> <li>▶ Managing workflow</li> <li>▶ Creating and managing team schedules and priorities</li> <li>▶ Team resource allocation and expenses</li> <li>▶ Reporting to management (steering committee)</li> <li>▶ Evaluating performance and providing feedback</li> <li>▶ Employee development and training</li> </ul>	<ul style="list-style-type: none"> <li>▶ Sets budget and allocates resources</li> <li>▶ Develops mission and objectives</li> <li>▶ Schedules projects based on priority</li> <li>▶ Planning</li> <li>▶ Monitor implementation of the management plan</li> </ul>

SCF

SBMU  
Manager

LNV

*The table is an example draft of the responsibilities for each entity based on the information gathered during this assessment. It is worth mentioning that this draft must be updated in collaboration with the stakeholders involved after making the decision on the final management structure. It can therefore not be considered a definitive advice on EY's behalf. However, it does provide a guideline on our opinion.*

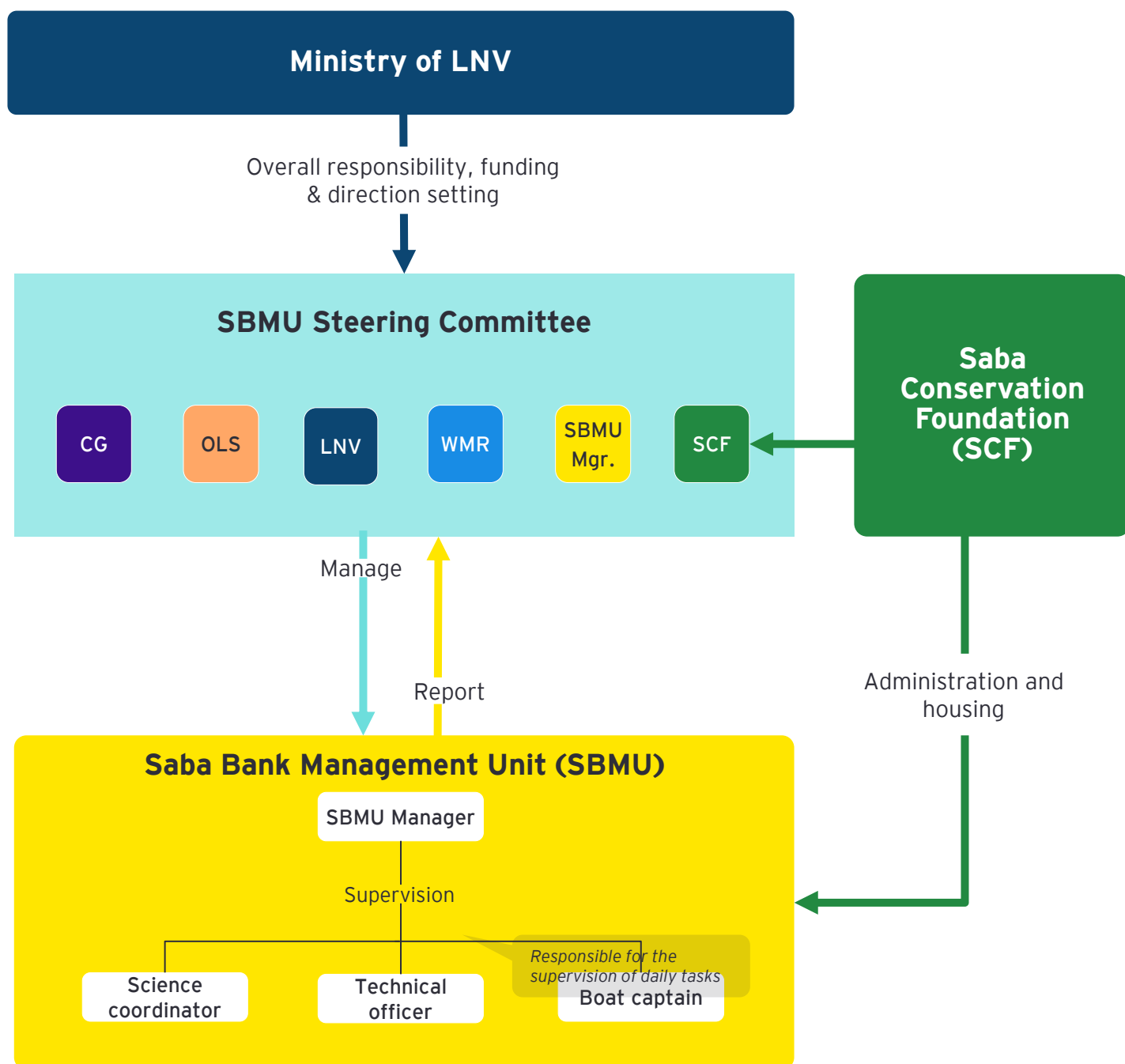
**C. Focus on critical success factors:** To allow the management structure to work, it is of utmost importance that the proposed improvements are implemented by also focusing on the following conditions:

- ▶ Formalizing agreements, improving the management plan, and clarifying roles and responsibilities
- ▶ Increased promotion of the SBMU and its objectives for "brand" awareness. We see that currently; people seem to be unaware of the purpose of the SBMU and its relationship with the SCF
- ▶ Restructuring of the Steering Committee to ensure stakeholder representation, involvement, and advocacy
- ▶ Formulating SMART formulated objectives and tasks

By improving the current structure with the aforementioned improvements, the following advantages and disadvantages will be realized:

Advantages	Disadvantages
<ul style="list-style-type: none"> <li>▶ Cost Effective: No major logistical investments such as costs for new office spaces or additional administrative</li> <li>▶ Pooling of resources and talent: The collaboration with the SCF will be continued</li> <li>▶ Improved stakeholder involvement: By involving all relevant stakeholders in the Steering Committee, the objectives can be better aligned</li> <li>▶ Expectations are managed: Better describing the roles and specifying the objectives will create more clarity among stakeholders</li> </ul>	<ul style="list-style-type: none"> <li>▶ Risk of falling back into old patterns: If the critical success factors are not in place, this scenario will lead to the same challenges</li> <li>▶ Adding more complexity with an additional manager and more members in the steering committee</li> </ul>

The proposed structure, considering these recommendations, is shown on the following page.



*The above structure is a conceptual example of how the SBMU can be organized differently in this scenario. If selected, this should be detailed and elaborated further based on the required research and agreements.*

## 5.2 Segregate SBMU from SCF

**In this scenario, we suggest a segregation of the SBMU from SCF. This means that the service agreement between SCF and LNV will be dissolved.**

Before outlining the possibility of segregating SBMU from SCF, it is important to circle back to the initial benefits of the structure. The current structure of having SBMU within SCF provides:

- ▶ The pooling of resources (talent, housing, knowledge and existing structures)
- ▶ Prevention of fragmentation and competition on a small island like Saba
- ▶ Administration and payroll

However, the assessment shows the following disadvantages of the current structure:

- ▶ Time and focus is spent on non-Saba Bank related tasks
- ▶ Framework is not clear to stakeholders
- ▶ No clear overview on spending
- ▶ Decreased autonomy

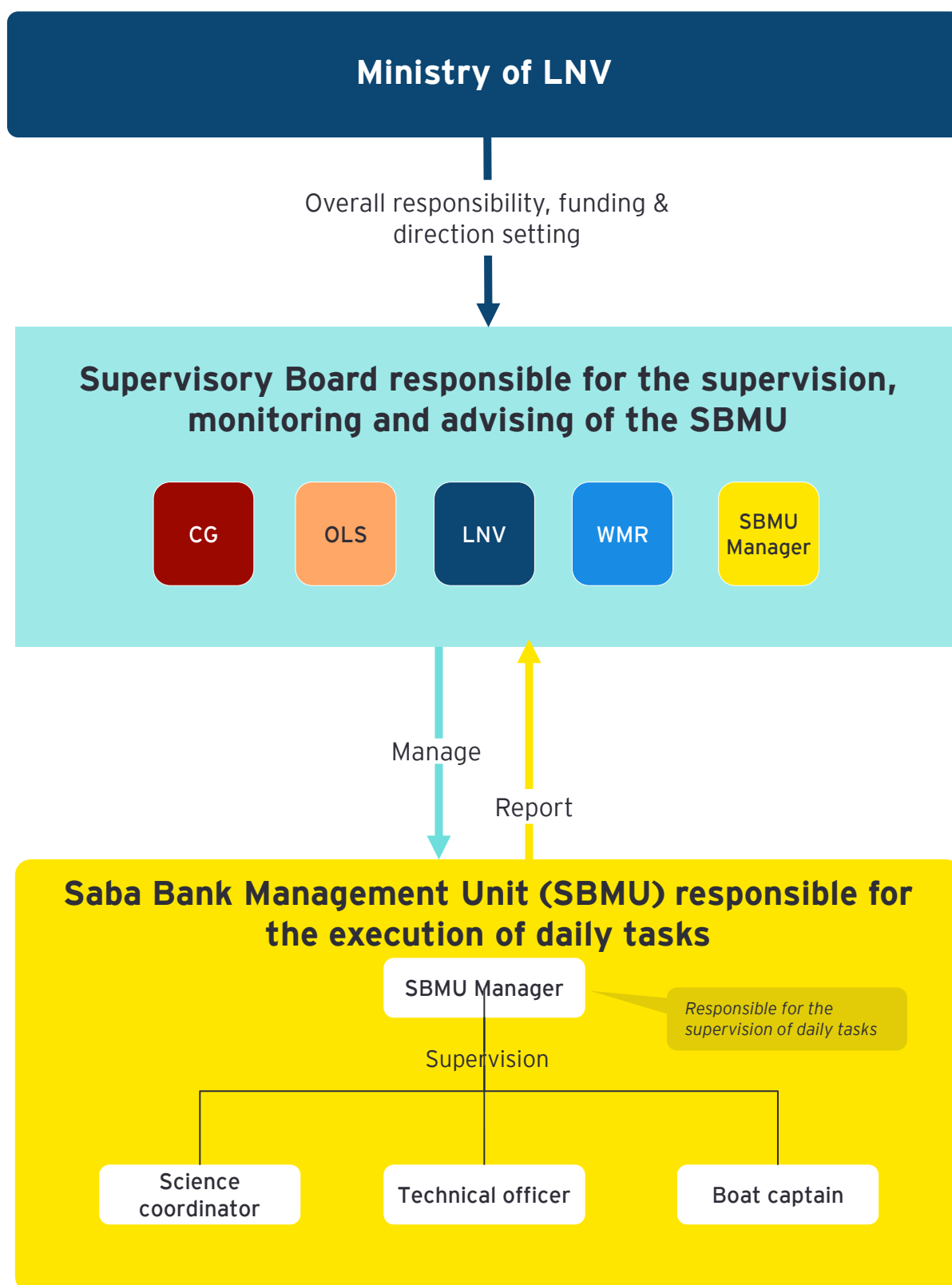
Seeing the importance of proper execution of the SBMU in regards to the Saba Bank, it is of importance the SBMU is structured in a way that contributes efficiencies and effectiveness of the SBMU tasks. Based on our findings and beforementioned disadvantages we recommend segregating SBMU from SCF as an option to consider. The most obvious organization form would be a two-tier management foundation, whereby the daily tasks will be executed by employees including a director and a supervisory body will be responsible for the supervisory function. This will increase priority and autonomy on Saba Bank related tasks.

Since SCF is currently responsible for housing, administration and payroll, attention should be paid to the following issues when splitting the tasks and establishing an independent management organization:

- ▶ **Housing:** Will the new organization continue to rent space at SCF or will there be a separate office? The location should be considered for efficient monitoring of the fish landing.
- ▶ **Administration:** segregation means it will be necessary for the SBMU itself to prepare financial statements, determine the budget requirements, accurate bookkeeping of income and expenditure. This may require the future manager to also possess these skills.
- ▶ **Payroll:** the contracts with SCF and SBMU officers will need to be terminated in this scenario, after which the employees will be employed by the new independent management organization.

Advantages	Disadvantages
<ul style="list-style-type: none"> <li>▶ <b>Independent SBMU:</b> The separation will allow the SBMU to operate completely independent and will allow more focus on SBMU specific tasks</li> <li>▶ <b>'Brand' awareness:</b> The community and stakeholders will be able to distinguish the SBMU from the SCF</li> <li>▶ <b>Simplify the structure:</b> This structure would add more clarity on roles and responsibilities</li> <li>▶ <b>Budget alignment:</b> Budget will be solely used for Saba Bank related tasks</li> <li>▶ <b>More responsibility:</b> An independent SBMU will allow more responsibility and involvement in the overall Saba Bank management</li> </ul>	<ul style="list-style-type: none"> <li>▶ <b>More resources required:</b> A separation with the SCF will imply no pooling of resources and talent</li> <li>▶ <b>Additional costs:</b> Running the SBMU as a separate organization inherently entails additional costs (i.e., administration costs, transition costs)</li> <li>▶ <b>Stakeholder management:</b> This scenario is a significant change from the current scenario, and will require additional effort to manage stakeholder pushback and realize the change</li> </ul>

A high-level overview of the tasks division within this new management foundation is provided below:



*The above structure is a conceptual example of how the SBMU can be organized differently in this scenario. If selected, this should be detailed and elaborated further based on the required research and agreements.*



## 3.2 EY's advice

### The priority should be ensuring the right conditions for effective management

Our initial understanding of the challenges around the management of the Saba Bank was primarily focused on the management structure. However, throughout our analysis of available documentation, and our compilation of the interview findings, the current challenges, and the leading practices, EY realized that solely focusing on the management structure would not cover the full scope of the challenge at hand.

EY recognized the opportunity to bring greater value by considering a broader scope of themes when identifying the improvement potential. Therefore, our recommendations were established from a holistic perspective and our advice is not solely based on potential organization structures. Our advice also encompasses other themes that contribute to management effectiveness.

An organization structure is one of the most important instruments to carry out a strategy and achieve objectives. In our experience, whichever structure chosen might lead to both failure or success. The success of a structure, is however dependent on having the key conditions in place for the chosen structure to be effective. Having said that, our main conclusion on the current structure is that its pitfalls are mostly based on not having the right conditions in place. As reflected in our recommendations, EY believes that with the right conditions the current structure might still prove effective. However, aspects such as adequate agreements, clear objectives, optimal stakeholder engagement mechanisms, and enabled leadership must first be guaranteed. As reflected in our findings, most of the current issues are around these conditions rather than around the organization structure.

Considering the above, EY's advice is more in line with scenario 1, which is to enhance the current structure. EY is of the opinion that the collaboration between the SCF and the SBMU is beneficial for both parties, as well as the LNV. This holds true when you consider:

- ▶ The duration of the relationship
- ▶ The similarity between both organizations
- ▶ The logistical benefits tied to this construction

On the other hand, while separating the SBMU from the SCF would have several advantages, EY does not believe these advantages merit the associated effort that will be required to effectively make the transition. Considering the extent of the current challenges the focus should be primarily on ensuring that the key conditions are met.

To ensure the success of the recommended scenario the roles must be very clear and well understood. Being ultimately responsible for the management of the Saba Bank, the Ministry of LNV must understand its role in ensuring the stakeholders are aligned in both realizing the ideal scenario and delivering in the updated framework.

Seeing that the LNV must do this in consultation with the key stakeholders, the Steering Committee also becomes the focal point when improving the current structure as proposed in scenario 1. As with any other organization, the test of time usually brings new challenges to the forefront. The Steering Committee must be enabled to guide and steer the SBMU towards its objectives, align the Saba Bank stakeholders, and ensure that the management plan is realized according to plan.

EY stresses the importance of getting the conditions right. This requires some immediate actions that are imperative for success:

- ▶ Properly write out and elaborate agreements
- ▶ Realign and specify the objectives
- ▶ Recruitment of the SBMU manager
- ▶ Formalize and document current agreements with the Coast Guard and the WMR
- ▶ Elaborate and use an annual workplan
- ▶ Determine communication actions and plan

Considering how important it is to get these aspects right, EY advises the LNV to work with external professionals to get everything duly set up. This will require additional cost to immediately get it right. While having the right expertise will be vital, it must all eventually be carried by the LNV, the Steering Committee, the SBMU, and the other stakeholders. After all, EY is convinced that sizeable investments and radical changes will not automatically guarantee effective management, but it all hinges on; getting all stakeholders on board, and in the right direction with the right conditions.

# Appendices

# Appendix A

## Stakeholders interviewed

### **Ministry of Food, Nature and Agriculture**

Yoeri de Vries

Hayo Haanstra

Martijn Peijs

### **Saba Bank Management Unit**

Ayumi Kuramae Izioka (Program Officer)

Walter Hynds (Assistant Program Officer)

Tom Brokke (Technical Officer)

### **Saba Conservation Foundation**

Kai Wulf (Manager)

Peter Johnson (President of the Board)

### **Openbaar Lichaam Saba**

Jonathan Johnson (Governor)

Tim Muller (Island Secretary)

Bruce Zagers (Commissioner)

Courtney Hassel (Policy Advisor)

Justin (Policy Advisor)

Menno van der Velde (Retired Policy Advisor)

### **Saba Fishermen Association**

Cassandra Holm

Lorna Hassell

Ryan Hassell

Joshua Holm

### **Independent fishermen**

Nicky Johnson

### **Dutch Caribbean Coast Guard**

Roberto Levenstone

### **Research**

Dolfi Debrot (WUR)

Alwin Hylkema

# Appendix B

## Documents reviewed

### Management Plans

Saba Bank Special Marine Area Management Plan 2008

Strategic Plan 2018-2023

Terms of Reference SBMU 2022

SBMU Day to Day Management

Fisheries Management Plan Caribbean Netherlands 2020-2030

### Minutes

Minutes Steering Committee

Minutes BES

### Legislation

Wet grondslagen natuurbeheer en bescherming BES

Visserijwet BES

Visserijbesluit BES

Besluit visverbod voor bepaald tijdvak Saba

Rijkswet Kustwacht voor Aruba Curacao en Sint Maarten alsmede voor de openbare lichamen Bonaire, St Eustatius en Saba

Rijkswet instelling exclusieve economische zone

Besluit grenzen caribische exclusieve zone

Wet maritime beheer BES

### Agreements

Agreement on the management of Marine biodiversity and fisheries between the governments of The Netherlands, Aruba, Curacao, St. Maarten, Bonaire, St Eustatius and Saba

Dienstverleningovereenkomst Uitvoering Programma Beheer Saba Bank

### Research

Saba Bank Fisheries: reasons for cautious optimism (February 2018)

Port Sampling report (draft June 2022)

Status and Trends Saba Bank Fisheries (July 2021)

Telemetry Study Red Hinds (Ayumi, 2022)

Trap Tagging System for Saba Bank (Ayumi, 2022)

Remaining budget proposal (Ayumi, 2022)

### SBMU reports

Activity report (August, 2017)

Activity report (December, 2017)

Annual report (2020)

### Weekly planners

Weekly planner Ayumi October 2021

Weekly planner Ayumi February 2022

Weekly planner Tom January 2022 (2x)

Weekly planner Tom February 2022 (2x)

### Previous evaluations

Saba Bank evaluation March 2017

### Other

Organogram SCF (2022)

Dive safety Saba Bank

Dive safety Marine Park

Handbook Saba Fisheries and Monitoring (January, 2018)

Budget SBMU (2022)

Employee agreement Park Officer



# Appendix C

## Individual tasks

When comparing individual tasks to the overall objectives of the SBMU found in the Terms of Reference, gaps emerge. However, these gaps are only present on paper. In reality, the SBMU team takes on more tasks than enlisted in the individual tasks in the Terms of Reference. But because these tasks are not written down in the Terms of Reference, a discussion may arise as to which tasks fall within the job description.

Objective/Task	PO	APO	TO
Going out on the Saba Bank at least 3 times weekly (circumstances permitting at the discretion of the SCF Parks Manager)			
Actively promoting sustainable fishing practices.			
Liaising and consulting with fishermen in regular meetings and engaging them in the -management.	✓		
Exploring opportunities for marine fauna habitat restoration.			
Monitoring of fish landings and regular on-board observations on fishing boats.			
Reporting on violations of the fishery regulations to the proper authorities (incl. coastguard, police, public prosecutor)			
Establishment and maintenance of database, administration and monthly reporting to steering committee on activities	✓		
Boat and equipment maintenance		✓	✓
Maintenance of research equipment deployed on the Bank			✓
Monitoring of relevant parameters in accordance with the Monitoring Plan for CN and as directed by the Steering Committee	✓		
Establish and carry out public awareness and sensitization programs on better use of the natural resources of the Saba Bank			
Maintaining good communication links with the Dutch Caribbean Coast Guard	✓		
Assisting in the logistics of approved scientific research projects on the Saba Bank			
Assisting in the implementation of the Yarari Marine Mammal management plan			
Reporting quarterly to the steering committee and the EEZ committee	✓		

# Appendix D

## SMART framework

To assess the adequateness of the objectives, we use the SMART framework. SMART is an effective tool that provides clarity, focus and motivation needed to achieve goals. Objectives that are SMART, are:

**Specific** - well-defined, clear, unambiguous

**Measurable** - specific criteria to measure progress

**Achievable** - attainable

**Realistic** - within reach, relevant to mission

**Timely** - with a clearly defined timeline

Working through each step of creating a SMART objective can reveal instances where priorities and resources are out of alignment.

As seen in the table below, not all objectives are defined SMART. There is a gap in the principles of measurable and timely.

Overall, the current objectives are specific, achievable and realistic, with some exceptions.

Objective/Task	S	M	A	R	T
Going out on the Saba Bank at least 3 times weekly (circumstances permitting at the discretion of the SCF Parks Manager)	✓	✗	✗	✗	✓
Actively promoting sustainable fishing practices.	✗	✗	✓	✓	✗
Liaising and consulting with fishermen in regular meetings and engaging them in the -management.	✓	✗	✓	✓	✗
Exploring opportunities for marine fauna habitat restoration.	✗	✗	✗	✗	✗
Monitoring of fish landings and regular on-board observations on fishing boats.	✓	✗	✓	✓	✗
Reporting on violations of the fishery regulations to the proper authorities (incl. coastguard, police, public prosecutor)	✓	✓	✓	✓	✗
Establishment and maintenance of database, administration and monthly reporting to steering committee on activities	✓	✓	✓	✓	✓
Boat and equipment maintenance	✓	✗	✓	✓	✗
Maintenance of research equipment deployed on the Bank	✓	✗	✓	✓	✗
Monitoring of relevant parameters in accordance with the Monitoring Plan for CN and as directed by the Steering Committee	✗	✗	✓	✓	✗
Establish and carry out public awareness and sensitization programs on better use of the natural resources of the Saba Bank	✓	✗	✓	✗	✗
Maintaining good communication links with the Dutch Caribbean Coast Guard	✓	✗	✓	✓	✗
Assisting in the logistics of approved scientific research projects on the Saba Bank	✗	✗	✓	✓	✗
Assisting in the implementation of the Yarari Marine Mammal management plan	✗	✗	✓	✓	✗
Reporting quarterly to the steering committee and the EEZ committee	✓	✓	✓	✓	✓

# Appendix E

## Management Plans Descriptions

Plan	Description
EEZ Management Plan	The EEZ management plan was drafted and published before the dissolution of the Netherlands Antilles. This management plan outlines the purposes and the way in which the Dutch Caribbean EEZ and particularly the Saba Bank may be used in a sustainable manner, based on a shared vision and common set of goals. This plan initially stemmed from the framework policy plan “Natuurbeleid van de Nederlandse Antillen” (2000) that recognized the urgent need for a management plan for the Saba Bank.
Nature and environment policy plan Caribbean Netherlands (NEPP 2020-2030)	The NEPP 2020-2030 is the policy framework of the LNV for the Caribbean Netherlands. This is a ten-year policy plan with a midterm evaluation in progress. The aim of this plan is to align the needs for local conservation and socioeconomic development with national and international commitment to biodiversity targets.
Saba Bank Management Plan	The Saba Bank Management Plan outlines the purpose and way in which the Saba Bank is to be used and managed. It sets the management objectives and strategies to achieve the stated objectives. The Saba Bank management plan was first created in 2008, with the cooperation of multiple stakeholders. It was designed to be a working document that should be updated periodically with additional material to allow adaptive management as situations and issues change, management actions succeed, and legislation is updated.
Terms of Reference (SBMU)	The Terms of Reference (TOR), is a document that includes the Governance Structure, an overview of the Human Resources overview, general tasks and individual tasks based on the aforementioned documents.

# Appendix F

## Terms of Reference

### Terms of Reference action points

1. Going out on the Saba Bank at least 3 times weekly (circumstances permitting at the discretion of the SCF Parks Manager)
2. Actively promoting sustainable fishing practices
3. Liaising and consulting with fishermen in regular meetings and engaging them in the -management
4. Exploring opportunities for marine fauna habitat restoration
5. Monitoring of fish landings and regular on-board observations on fishing boats.
6. Reporting on violations of the fishery regulations to the proper authorities (incl. coastguard, police, public prosecutor)
7. Establishment and maintenance of database, administration and monthly reporting to steering committee on activities
8. Boat and equipment maintenance
9. Maintenance of research equipment deployed on the Bank
10. Monitoring of relevant parameters in accordance with the Monitoring Plan for CN and as directed by the Steering Committee
11. Establish and carry out public awareness and sensitization programs on better use of the natural resources of the Saba Bank
12. Maintaining good communication links with the Dutch Caribbean Coast Guard
13. Assisting in the logistics of approved scientific research projects on the Saba Bank
14. Assisting in the implementation of the Yarari Marine Mammal management plan
15. Reporting quarterly to the steering committee and the EEZ committee

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