



**COMMISSION
FIFTEENTH REGULAR SESSION**
Honolulu, Hawaii, USA
10 – 14 December 2018

LETTER TO WCPFC ON SUSTAINABILITY OF TUNA STOCKS

**WCPFC15-2018-OP05
26 November 2018**

Submission by International Seafood Sustainability Foundation (ISSF)

November 21, 2018

ATTN: Heads of Delegation to IOTC, IATTC, ICCAT and WCPFC

Dear Delegates:

This letter is submitted on behalf of the undersigned companies, non-governmental organizations and fishing industry associations, all of whom recognize that the sustainability of tuna stocks is integral to businesses and livelihoods, as well as to the health of the marine environment.

The companies represent major seafood buyers that source seafood products from a diverse, international supply network.

The non-governmental organizations work in more than 100 countries and engage suppliers and provide advice to retailers, buyers and food service companies regarding improvements in tuna sustainability.

The fishing industry associations represent a variety of gear types, including purse seine, longline, troll, pole and line, and handline vessels active in tuna fisheries worldwide.

Your government serves as an important leader in tuna stock sustainability as a member of one or more of the four regional fisheries management organizations (RFMOs) charged with managing the world's tropical tuna fisheries. We are writing to bring to your attention our collective views on several issues crucial to the long-term sustainability of tuna stocks:

- The development and implementation of comprehensive, precautionary harvest strategies
- Effective monitoring and management of fish aggregating devices (FADs)
- Strengthened monitoring, control and surveillance tools, including increased observer coverage in purse seine and longline fisheries, and of at-sea transshipment activity through human observers and/or electronic monitoring
- Greater focus on implementation of bycatch mitigation actions broadly, with an emphasis on longline fisheries

We recognize that certain tuna RFMOs have made progress on several of these issues and we applaud those actions.

However, we wish to underscore that while the progress to-date is positive, accelerated actions must be taken at this year's RFMO meetings to:

1. Develop and implement comprehensive, precautionary harvest strategies with specific timelines for all tuna stocks, including the adoption and implementation of target and limit reference points, harvest control rules, monitoring strategies, operational objectives, performance indicators, and management strategy evaluation;
2. Adopt a 100% observer coverage requirement for purse seine vessels where it is not already required, and require the use of the best-available observer safety equipment, communications and procedures;
3. Increase compliance with mandatory minimum 5% longline observer coverage rates by identifying and sanctioning non-compliance, and adopt and implement a 100% observer coverage requirement – human and/or electronic – within five years for longline fisheries;
4. Adopt and implement a 100% observer coverage requirement for at-sea transshipment activities, as well as other measures that ensure transshipment activity is transparent and well-managed, and that all required data is fully collected and sent to the appropriate bodies in a timely manner;
5. Develop and implement science-based recommendations for the effective management of FADs, and integrate FAD-based information into stock assessments to reduce uncertainties;
6. Adopt effective measures for the use of non-entangling FAD designs as a precautionary measure to minimize the entanglement of sharks and other non-target species, and support research on biodegradable materials and transition to their use to mitigate marine debris;
7. More effectively implement, and ensure compliance with, existing RFMO bycatch requirements and take additional mitigation action, such as improving monitoring at sea, collecting and sharing operational-level, species-specific data, and adopting stronger compliance measures, including consequences for non-compliance for all gear types.

Collectively, we believe these measures will positively impact the long-term sustainability of tuna stocks and the overall health of the marine ecosystem.

We request that your government, as a member of one or more of the tuna RFMOs, take active steps to ensure significant progress on these issues at each of the relevant RFMO meetings in 2018, as a matter of priority.

Sincerely,



Gavin van Der Burgh, CEO



Rayk Mende, Managing Director, ALDI North



Hugo Byrnes, VP of Product Integrity



Anja Grote Westrick, Director Corporate Responsibility International, ALDI South Group



Anthony Snow, Seafood Director



Guy Dean, VP/CSO



Natalie Webster, Operations Manager



David A. Wiedenfeld

David A. Wiedenfeld, Ph.D, Sr. Conservation Scientist



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Indonesian Pole & Line and Handline Fisheries Association

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Janti Djuari, Chairwoman



Natalie Webster

Natalie Webster, Co-Founder



Tod Mackenzie

Tod Mackenzie, Senior VP, Corporate Communications and Public Affairs



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Anertz Muniategi, Managing Director



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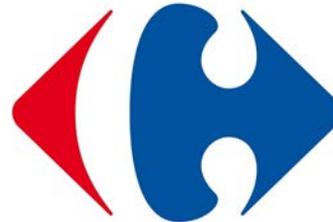
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Mané Calvo García-Benavides, CEO

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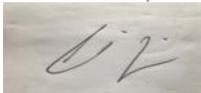
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Karly Kelso, Senior Manager, Oceans



Katie Schleit, Senior Marine Campaign Coordinator



John V. Young, Specialty Procurement



i.V. Kerstin Jürges, Head of Division for Sustainable Purchasing/CSR



Harm Jan van Dijk, Founder



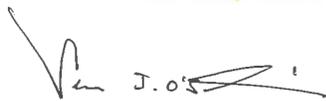
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Anne Cathy de TAEVERNIER

Director of Sustainable Products & Culinary Innovation



Tobias Aguirre, Chief Executive Officer



Sean J. O'Scannlain, President & CEO



Sampath Ragindha Padmawansa, Chief Executive Officer, Global Sea Foods (PVT) Ltd.



Jose Aller, Sustainability Manager



Mané Calvo García-Benavides, CEO of the Calvo Group



Mr. Teddy Kho, VP-General Manager, General Tuna Corporation



David Pinsky, Senior Oceans Campaigner, Greenpeace USA



Kevin Bixler, Global Director, Group Fish Procurement



Executive Vice President, Perishables



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Edward Pickup, Executive Secretary



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LianCheng

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Michel Biero, Head of Purchasing



Kevin Bixler, Global Director, Group Fish Procurement

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Hannah Macintyre, Fisheries & Aquaculture Manager



Isabelle Aelvoet, Global Sustainability Director



Dr. Deirdre Duggan, Director of Programs and Science



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Veronika Pountcheva, Global Director Corporate Responsibility

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Julio Morón
Julio Morón, Director Gerente



Mané Calvo García-Benavides, CEO of the Calvo Group



John Steinmetz, Vice President of Business Development



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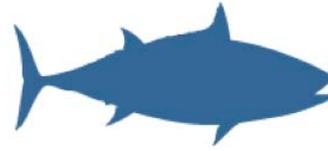


Alex Smolinsky , SHARKPROJECT International

Herbert Futterknecht , SHARKPROJECT Austria

Friederike Kremer-Obrock, SHARKPROJECT Germany

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John Scott, VP - Global Responsibility, Quality &
Food Safety



(South Africa)



Kevin O'Brien, Group Risk & Sustainability
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Ruth Westcott, Campaign Coordinator



Andrew Choe, President & CEO



Dr Tom Pickerell, Global Tuna Director



Richard Stavis, Chief Sustainability Officer



Amanda Nusz

Amanda Nusz: Vice President, Product Quality & Responsible Sourcing



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Mark Zimring

Mark Zimring, Director, Indo-Pacific Tuna Program



Fabien Girard

Fabien GIRARD
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Shana Miller

Program Manager, Global Tuna Conservation
The Ocean Foundation



Kevin Bixler

Kevin Bixler, Global Director, Group Fish Procurement



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Rachel Hopkins
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Hauptgeschäftsführerin

Feroz Koor, Group Head of Sustainability



William W. Fox, Jr., PhD, VP, Tuna Fisheries Conservation



John Burns, Vice President Global Quality Assurance & Food Safety



John Burton, Founder

