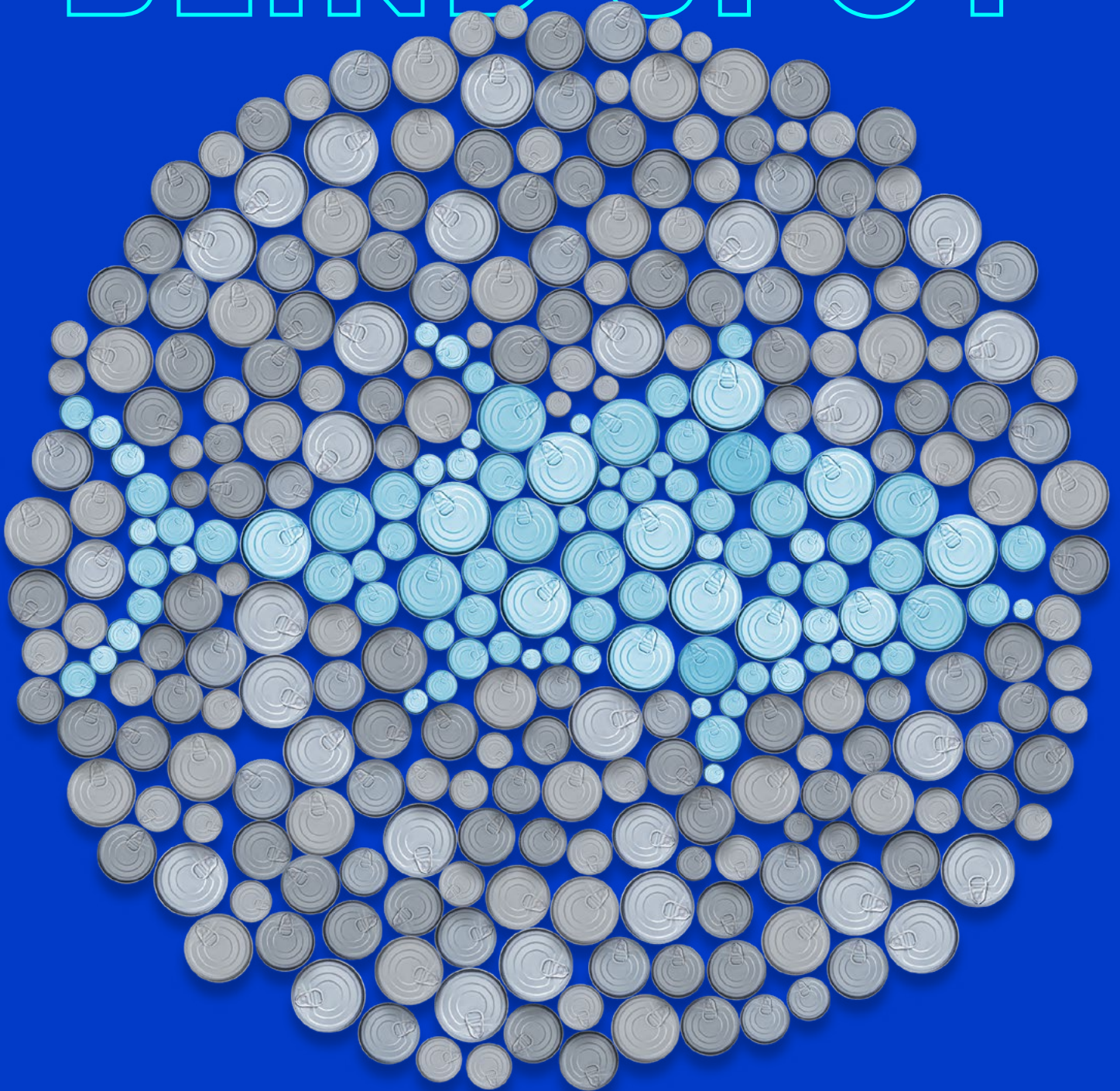




BLUE MARINE
FOUNDATION

THE UK'S **TUNA** BLIND SPOT



Exposing the **misleading** sustainability claims
and **double standards** used to sell tuna in the UK

INTRODUCTION

If you take even a passing interest in marine conservation and sustainable fishing, you will likely have come across Ian Urbina's most recent piece of outstanding investigative journalism published in the New Yorker last month¹. The four-year investigation exposed the environmental devastation and horrific human rights abuses so prevalent within China's rapacious distant-water fishing fleet and has already led to ties being cut with Chinese companies² and to questions being asked of American and European retailers³ over their potential role in selling seafood tainted by forced labour allegations.

Whenever a big story like this reaches the mainstream press, illegal and unsustainable fishing is afforded a brief moment in the sun. In my experience, not since Seaspiracy aired on Netflix in March 2021 has the issue of industrial overfishing been raised so enthusiastically as a topic of discussion at dinner parties and down the pub and, most surprisingly for me, even at the football. These conversations sometimes lead to questions about our work at Blue Marine Foundation and what my coworkers and I are currently busy with. Even before Ian Urbina's recent report, when I explain that we're combatting the rampant overfishing of tuna in the Indian Ocean, nine times out of ten the assumption is that the main perpetrators are the Chinese fleets. Cue the looks of surprise, therefore, when they discover that it is in fact the EU's powerful distant-water fishing fleet that has caught far more tuna than anyone else in the eight years since the region's overfishing crisis began, thanks in no small part to their use of a type of fishing gear called drifting fish aggregating devices, or FADs.

Over the course of this short report, I'll take you with me on a trip to the tinned goods section of your local UK supermarket to have a look at the tuna being sold, how it is caught and where it comes from. We'll stop off in Kenya, Belgium, Seychelles and Mauritius on the way to keep things interesting and to explain why

Blue Marine Foundation, French NGO BLOOM Association and Greenpeace UK are calling on UK retailers to stop selling tropical tuna caught around drifting FADs in the Indian Ocean by not entering into any new supply agreements for tuna caught in this way.



JESS RATTLE

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WHAT'S HAPPENING IN THE INDIAN OCEAN?

Grab your towel because our first stop is the entire Indian Ocean, home to three tropical tuna species: long-lived bigeye tuna, listed as “vulnerable” on the IUCN red list; magnificent, highly migratory and highly prized yellowfin tuna; and small, stripey, prolific skipjack. Each one has been uniquely mismanaged by those in charge of protecting complicated fish populations that weave in and out of territorial waters and the high seas with no respect for borders or jurisdiction. Both yellowfin and bigeye tuna have been formally recognised as overfished by the Indian Ocean Tuna Commission (IOTC) – the intergovernmental body that brings together coastal states and distant-water fishing nations to (mis)manage these shared stocks.

While bigeye tuna was only declared overfished last year, yellowfin tuna has been in the red since 2015. The IOTC recently acknowledged that yellowfin catches have in fact exceeded the “maximum sustainable yield” for well over a decade⁴. A recovery plan, complete with interim country-specific catch limits, has been in place for yellowfin tuna for almost as long as the stock has been overfished. The most recent stock assessment showed that a 30% reduction in catches (relative to 2020 levels) is now needed to allow the population to recover by 2030⁵. That translates into a catch limit of a little over 300,000 tonnes per year. In 2022, a mind-blowing 413,680 tonnes of yellowfin tuna were caught⁶ – 37% higher than the recovery plan catch limit. Even skipjack tuna, the most abundant of the three, is being mismanaged. A total catch limit has been in place since 2018 and, every single year since then, it has been systematically ignored. Last year’s overcatch was the worst yet – total catches should have been limited to 513,572 tonnes, but instead reached an all-time high of 671,317 tonnes⁶.

SKIPJACK TUNA



YELLOWFIN TUNA



BIGEYE TUNA



Yellowfin tuna catch limit

301,000 TONNES

2022 Yellowfin tuna catch

413,680 TONNES



Skipjack tuna catch limit

513,572 TONNES

2022 Skipjack tuna catch

671,317 TONNES

Fishing pressure in the Indian Ocean is out of control and a significant portion of the region’s tuna troubles can be chalked up to the allocation dispute that has been dragging on at the IOTC for more than a decade. While we know that the total skipjack tuna cake should only be 513,572 tonnes in total, no one knows how big a slice they’re allowed to take and, while some take just enough to feed themselves, others go back for seconds and even thirds, resulting in the rampant overfishing that we see taking place in the region.

There are currently 30 members of the IOTC and each country has its own set of interests and priorities that it brings to the IOTC table each year. Anyone unlucky enough to have been part

of a birthday WhatsApp group knows that getting 30 people to agree on anything at all is almost impossible. Throw in three tropical tuna ticking timebombs, a coalition of developing coastal states wanting to benefit from this precious resource on their doorstep, and a handful of powerful distant-water fishing nations who have enjoyed decades of unchecked exploitation, and it’ll come as little surprise that progress on tuna allocation and deciding who should bear the conservation burden is proving glacial⁷. And, while IOTC members spend years trying to work out how to have their tuna cake and eat it, yellowfin, bigeye and skipjack (not to mention countless bycatch species) pay the price.



A MALDIVES HANDLINE FISHERMAN WITH AN ADULT YELLOWFIN TUNA. CREDIT: IPNLF



PURSE SEINE VESSEL IN PORT VICTORIA, SEYCHELLES



PILES OF PURSE SEINE NETTING

some of these purse seine vessels exceed
**100M IN
OVERALL LENGTH**
making them
**TALLER THAN
THE STATUE
OF LIBERTY**



MORE PILES OF PURSE SEINE NETTING



ANOTHER PURSE SEINE VESSEL IN PORT VICTORIA, SEYCHELLES

More than two-thirds of the 30 IOTC members are Indian Ocean coastal states, many of which depend heavily on fishing and the marine environment for livelihoods and food security. Some Indian Ocean countries like the Maldives have thriving fishing industries, focusing on one-by-one methods of catching tuna and supporting thousands of jobs. Mauritius and Seychelles have chosen a different route and have allowed 17 EU-owned industrial tuna purse seine vessels to fly their flags of convenience. They've also allowed Princes (owned by the Mitsubishi Corporation) and Thai Union (known by its brand name 'John West' in the UK) to set up shop on their tropical

islands, in the form of giant factories which process the tuna caught by these 17 industrial vessels and the 28 others that fly their true flags – those of Spain and France (and even one flagged to Italy). But the EU's imperial Indian Ocean empire is rapidly extending beyond these two island states, with an additional two EU-owned purse seine tuna fishing vessels reflagging to Oman and to Tanzania in the past 18 months. When one considers that some of these purse seine vessels exceed 100m in overall length (making them taller than the Statue of Liberty), the industrial scale of the EU's Indian Ocean fishing operation becomes clear.

THE WORST FAD SINCE THE AVOCADO BATHROOM



This insidious creep gives the Spanish and French-owned fleets access to the rich coastal waters of these Indian Ocean states and also allows them to exploit the precious yellowfin tuna quota assigned to coastal states as part of the recovery plan. When one views the EU fleet holistically – including all the vessels exploiting coastal state flags of convenience – its continued dominance in the region becomes clear. Despite there being 29 other IOTC members, the EU's extended fleet caught 32% of the region's tropical tuna in 2022⁵. This is particularly concerning given that the EU-owned purse seine fleet relies heavily on drifting FADs to catch tuna which causes untold damage to the marine environment, and to tuna stocks in particular.

Drifting FADs typically consist of a floating raft, a submerged "tail" that hangs below the raft, and a satellite buoy that allows fishing vessels to track and monitor the FAD from afar. They are deployed by purse seine fleets to drift freely around the ocean – often through marine protected areas and other countries' exclusive economic zones – gathering tuna beneath them, before giant circular seine nets are set around them and then drawn in (like a purse string), catching everything unlucky enough to be trapped inside. And tuna fishing companies love to use them, as they have greatly increased their efficiency⁸. Tracking a high-tech floating device via satellite, complete with remote information on the assembled eco-system gathered below, is a lot easier than having to actually hunt for big free-swimming schools of adult tuna as they have done historically.



DISCARDED
DRIFTING FAD
SATELLITE BUOYS



A TURTLE
ENTANGLED IN A FAD



HERE ARE THREE OF MANY REASONS WHY DRIFTING FADS ARE CONSIDERED SO HARMFUL:

By casting a shadow in an otherwise featureless environment, drifting FADs take advantage of the natural tendency of juvenile fish to group together for safety below floating objects, making it easy for purse seine fishing vessels to catch them long before they have had a chance to reproduce. A study published by the Global Tuna Alliance found that 97% of yellowfin tuna caught by purse seine vessels around these controversial drifting FADs in the Indian Ocean are juveniles⁹, further impacting the health of this already overfished stock. The juvenile yellowfin and bigeye tuna caught around drifting FADs now end up in cans alongside skipjack, despite the fact that, when caught as adults, they are far more valuable.

Other endangered, threatened and protected species also fall victim to drifting FADs, either as bycatch or through entanglement, with a recent study estimating that at least 100,000 silky sharks, which are listed as "vulnerable" on the IUCN Red List, end up as bycatch in the Indian Ocean purse seine industry alone each year¹⁰.

In some regions, the retrieval rate of drifting FADs is less than 10%¹¹, leaving tens of thousands of drifting FADs to sink and litter the seabed or wash up on the coastlines of small island nations. However, the real number is not known, as there is no public FAD register in place. The clean-up costs of this debris can be substantial, and there is currently no effective mechanism for obliging the vessel owners and their flag states to shoulder the financial burden of their polluting behaviour.

Ironically, the very plan that was put in place to protect yellowfin tuna is partly to blame for EU's increased use of drifting FADs. Because juvenile yellowfin and bigeye tuna tend to school with skipjack, you end up catching all three species, even if you're only trying to target one and, while there's no limit to the amount of skipjack that the Spanish and French fleets can catch, there is a limit on yellowfin, set by the IOTC recovery plan. In order to be able to keep catching skipjack year-round, the EU fleets need to make their yellowfin quota last as long as possible as, once it's finished, they have to tie up completely for the year. How best to do this? Stop fishing so much, let common sense prevail and send some of the giant purse seiners home? Course not! Just catch the yellowfin when they're babies, as IOTC quota is based on weight, not numbers of fish. Sounds like a foolproof plan, but how can you ensure you're catching nothing but juvenile overfished yellowfin and bigeye along with your coveted skipjack? Simple – cast your net around a drifting FAD where the juvenile yellowfin and bigeye tuna have foolishly huddled en masse for safety. Genius.



A TURTLE SWIMMING NEAR A FAD
CREDIT: ALEX HOFFORD/GREENPEACE

EUROPE'S DOMINANCE IN THE INDIAN OCEAN



We're off to Brussels now, where we often hear Virginijus Sinkevičius, European Commissioner for Environment, Oceans and Fisheries, speak passionately about the EU's determination to act as a "driving force towards ocean sustainability"¹² and about how our very future depends on a healthy ocean and its ability to regulate the climate¹³.

One might assume that this concern and apparent sense of urgency must surely translate into real ocean stewardship on the part of the mighty European Union, especially in badly overfished oceans far from European shores. The unfortunate reality, however, is that the EU prioritises the profits of its fishing industry over the health of the marine environment, especially when that marine environment is somewhere far away, out of sight and out of mind, like the Indian Ocean. The EU's recent behaviour in the region has ignited a geopolitical scandal¹⁴ complete with egregious neocolonial bullying of developing coastal states, all done to ensure the ongoing profitability of a handful of influential Spanish and French tuna fishing companies.



EUROPEAN COMMISSIONER FOR ENVIRONMENT, OCEANS AND FISHERIES, VIRGINIJUS SINKEVIČIUS

Grab your boarding pass because, if the story of the EU's Indian Ocean tuna greed were to be made into a film, the dramatic opening scene would almost certainly be set in Mombasa, Kenya in February earlier this year. It would feature Kenya's Minister of Mining, Blue Economy and Maritime Affairs, Salim Mvurya, presenting his opening statement to a crowded room and, in doing so, sending a shockwave and an audible gasp through rows of state delegates and NGO representatives who had travelled to the Pride Inn Hotel in Mombasa from all over the world to try and find a solution to the region's overfishing crisis.

The meeting was a special session of the IOTC, and the shock announcement was that Minister Mvurya had decided, seemingly overnight and with no warning given to his fellow coastal states, to withdraw the tuna conservation proposal that Kenya had been working tirelessly to develop and garner support for over a period of more than two years.

THE IOTC MEETING VENUE IN MOMBASA, KENYA



SMALL-SCALE TUNA FISHERMEN IN KENYA



Before this abrupt 180, Kenya had been campaigning for a closure period in the Indian Ocean during which the EU would not be able to use its favourite method of killing tuna in their millions – drifting FADs – and even submitted a paper to the IOTC's Compliance Committee the year before, showing systematic non-compliance of washed-up drifting FADs with existing IOTC regulations¹⁵. I remember making astounded eye-contact with several coastal state delegations, many of whom were co-sponsors of this proposal that had been so long in the making.

The official excuse given for Minister Mvurya's shock announcement – that Kenya withdrew its support because the proposal had not been vetted by the Ministry's cabinet – did not add up. Not only had the document been prepared months before the meeting, but Kenya's cabinet approval letter had been seen by delegates¹⁶. Our friends at BLOOM published a report shortly after the meeting, stating that "the European Commission had blackmailed Kenya at the highest level over 'blue economy' development aid money in order to obtain Kenya's withdrawal of its proposal on drifting FADs"¹⁶. Following the announcement, the special session was immediately suspended while coastal states

tried to regroup and, during the chaos, another meeting attendee came up to me and said that they felt bad for the EU delegation present at the meeting, after all it wasn't *their* fault that this had happened – it likely came from much higher up in the EU.

Minister Mvurya presumably did not realise that he did not have the authority to withdraw the proposal entirely, as it had 11 co-sponsors; all he could withdraw was Kenya's support. The heated special session continued for three days, and in the final hour of the last day, a vote took place by secret ballot. Despite the seemingly insurmountable setback at the start of the meeting (or perhaps because of it), the proposal ended up receiving enough support from other Indian Ocean coastal states (and the UK, I'm proud to say) to be adopted by a two-thirds majority at the meeting. However, despite this "huge win" for marine conservation, the sad reality is that any IOTC member can object to a resolution that it does not like and it won't be bound by it (one of the many reasons why the region's tuna stocks are in the state they are in) and, if more than one-third of the IOTC's 30 members object, the resolution becomes non-binding to all.

WHO NEEDS MAJORITY RULE WHEN YOU HAVE 🌟OBJECTIONS🌟

If you've made it this far, it may not shock you to hear that the EU decided it definitely did not like the new drifting FADs resolution, especially the 72-day closure period during which no fishing on drifting FADs would be permitted (despite similar closures being in place in all other oceans), and wasted no time in announcing its objections. I say "objections" because France gets two votes for the price of one, by virtue of its overseas territories. Equally predictably, for the reasons explained above, five other IOTC members – Kenya, Seychelles, Mauritius, Tanzania and Oman – filed their objections with the IOTC.

By far the most surprising objection was that of Somalia, who had been one of the 11 co-sponsors of the proposal from the beginning, and who provided no justification for their objection. More surprising still was Somalia's subsequent withdrawal of its objection a few weeks later, in which the Minister of Fisheries and Marine Resources explained that the previous letter, signed by State Minister Mohamed Bashir Ali, did not reflect the views of the Somali government. The letter went on to explain that drifting FADs *"frequently end up on the Somali coast, seriously threatening local ecosystems and the livelihoods of fishermen who rely on the fish stocks"*¹⁷. Rumour has it that this objection-revocation process was then repeated again, although this was not made public.

A similarly chaotic process of objection and withdrawal was then undertaken by Yemen. What motivated these two countries – neither of which use drifting FADs themselves – to object to this highly specific resolution that primarily affects the EU?

I have heard first-hand accounts of the pressure felt by coastal states to object. Sadly, while many stood their ground, the EU and neocolonialism won the day at the IOTC, and 11 objections were filed, effectively nullifying the resolution. However, the battle is not quite over, as we believe the EU's objection to be in breach of EU law and, in particular, of the precautionary principle, and have partnered with BLOOM to take legal action against the European Commission accordingly¹⁸.

FUN FACT

Following the IOTC meeting in February, a meeting of the European Parliament's PECH Committee was held in March. In this meeting, one Spanish MEP, Francisco José Millán Mon, noted that Kenya had announced its objection to the drifting FADs resolution. This came as a surprise to many, as the meeting of the PECH Committee took place on the afternoon of Wednesday 1 March 2023, with Kenya's formal notice of objection to the resolution only being published by the IOTC on Thursday 2 March 2023, raising the question of how the Spanish MEP knew that Kenya would object before the objection was announced by the IOTC.



FUN FACT

We also worked with the Guardian earlier this year to expose Spanish tuna industry [tracked changes](#) found in an official proposal submitted to the IOTC by the Seychelles government. The same article highlighted that more than half of the EU's delegation to the IOTC is made up of fishing industry lobbyists.



COMPARTMENTALISATION IS DEAD, LONG LIVE COMPARTMENTALISATION!



Now that we're back on British soil, you may be thinking "surely this neocolonial horrorshow has nothing to do with me" or even "I only buy MSC-certified tuna which couldn't possibly be caught in this way or by these fleets". The truth is that a great deal of the tinned tuna that finds its way onto UK shelves is caught in the Indian Ocean by purse seiners and on drifting FADs. Worst still, some of these tins are even sporting the shiny MSC blue tick of sustainability. Far too much of our time is already spent trying to stop destructive fisheries from becoming MSC-certified, so I won't go into detail on how the MSC allows fisheries to be certified with "conditions" that are rolled over for years¹⁹, or how the companies in charge of deciding whether or not a fishery meets the MSC standard are hired and paid for by the fishery itself, or indeed how Ian Urbina's report found that *"all ten of the Chinese seafood processing plants tied to Uyghur forced labour have been certified by the Marine Stewardship Council (MSC)"*²⁰. The many, many failings of the MSC are already well documented, with the following three reports published in 2023 alone²¹ by our friends at BLOOM, Shark Guardian and On The Hook, the latter of which Blue Marine is an active member.

Not only are we taking a whistle-stop tour around the world, but we're also going back in time, back to 2018. At an Environmental Audit Committee hearing at the House of Commons, MP Kerry McCarthy ask Rupert Howes, MSC's CEO of almost 20 years, the following question: *"Can I ask about the whole issue of compartmentalised fisheries and particularly how tuna fishing vessels are able to categorise part of their catch as sustainable when they are using these fish aggregating devices on the same trip? ... There is obviously a lot of concern that if a vessel is using sustainable and unsustainable fishing methods, possibly on the same trip, they may not deserve a blue tick."*²²

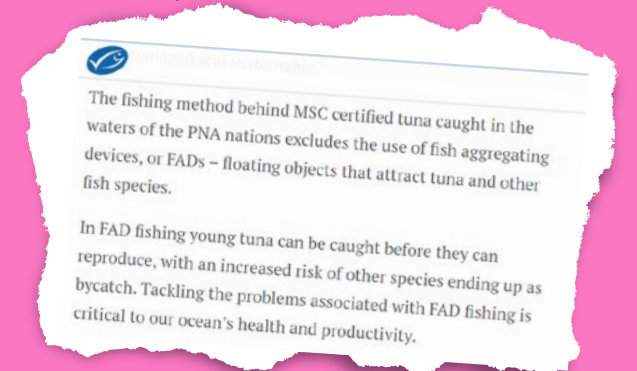


"Can I ask about the whole issue of compartmentalised fisheries and particularly how tuna fishing vessels are able to categorise part of their catch as sustainable when they are using these fish aggregating devices on the same trip? ... There is obviously a lot of concern that if a vessel is using sustainable and unsustainable fishing methods, possibly on the same trip, they may not deserve a blue tick."

This was happening around the time that the massive Parties to the Nauru Agreement (PNA) tuna fishery in the Pacific – the largest tuna fishery in the world – was having its MSC certification renewed, despite mounting concern about it being "compartmentalised". Compartmentalisation allowed "sustainable" tuna which was permitted to be sold carrying the MSC ecolabel to be caught alongside unsustainable practices like fishing on drifting FADs on the same vessel. The PNA fishery was a great example – the purse seine vessels set their nets around free-swimming schools of tuna in the open ocean with far lower levels of bycatch, but also set them around harmful drifting FADs, with all the negative associated impacts already described above; however, only the free-school catch was MSC-certified, not the unsustainable drifting FAD-caught fish caught by the same vessels.

Several MPs including Zac Goldsmith and John McNally called on the MSC to close this compartmentalisation loophole, with the former stating that it *"threatens to erode trust and destroy its brand"*²³. After only another two years of campaigning by On The Hook – the MSC has been accused of many things, but evolving quickly is not one of them – the MSC announced a ban on compartmentalisation²⁴. As ever, our jubilation was short-lived as, even before the ban on compartmentalisation was announced, purse seine fisheries simply started putting forward their FAD-caught tuna for certification, along with their free-school catch. One of the MSC's greatest hits (along with "we do not certify fisheries"²⁵ and "we are a crusty old standard setter"²²) is that they never

actually said that fish caught around drifting FADs could not be certified. They just implied it as strongly as possible, especially in the heyday of compartmentalisation. If you scroll back far enough on the MSC's website, you find this gem from February 2016²⁶.



Now, tuna caught by fisheries using FADs accounts for more than half of all MSC-certified tuna²⁷. In the Indian Ocean for example, several Spanish tuna fisheries have achieved certification for their skipjack catches (despite formal objections from NGOs including Blue Marine) but the rest of their catch – mostly yellowfin and bigeye tuna – is not certified because of how badly those stocks are overfished. Those juvenile bigeye and yellowfin are still put into cans and sold alongside their MSC-certified skipjack compatriots. So, despite being caught at the same time, in the same ocean, on the same trip, in the same net, by the same vessel, on the same drifting FAD, the MSC is happy to allow **part** of the catch to be certified while paying no attention to the rest. Where have we heard that before? It's like compartmentalisation Groundhog Day, but with the added threat of further stock decline and growing food insecurity for millions living in coastal communities.

TO THE SHOPS



We've finally made it to the supermarket and, given that we're in the UK, it's highly likely we're going to buy a tin of tuna, as 69% of British consumers eat tuna and 22% of them eat canned tuna at least once a week²⁸. UK shoppers spent £408.5 million on 61,012 tonnes of tuna between June 2022 and June 2023, making it the second most popular seafood choice after salmon²⁹.

Given the importance of tuna in the UK, Blue Marine, BLOOM and Greenpeace UK got in touch with the UK's ten major retailers in May of this year, following the EU's objection to the IOTC resolution on drifting FADs. The letter – the first of three rounds sent to the retailers – highlighted our concerns regarding the overfishing taking place in the Indian Ocean, the damage to marine ecosystems caused by drifting FADs, and the apparent willingness of the EU to cave to the fishing lobbies and exempt its fleets from having to comply with the new IOTC conservation measures. It also requested an explanation of the steps taken by retailers to address the many social and environmental impacts associated with tuna caught around drifting FADs, as well as detailed information regarding the volumes, origin and gear type used to catch each species of canned tropical tuna sold, both branded and the supermarkets' own-label. Our friends at BLOOM have undertaken the [mammoth task](#) of sorting and scoring the UK and EU retailers across a broad range of categories and criteria, far beyond the FAD-focused scope of this report. This was no mean feat, given that very few companies disclosed the data we requested, citing commercial confidentiality – a favourite response of every level of the tuna supply chain, despite their "product" being a common living resource. While responses varied greatly – from

proactive dialogues in some cases to a single one-line response over the course of five months in another – all but one of the UK's ten major supermarkets are suffering from a chronic blind spot when it comes to canned tuna.

Eight out of ten of the major UK retailers we studied sell both an "own-label" range of tinned tuna as well as one or more lines of "brand-name" tuna products like Princes or John West. While many of them took great pride in telling us all about their brilliant sustainable sourcing policies, not one of the eight applied the same standards to the brand-name products sold in their stores. Many retailers have clearly gone to great lengths to research where their own-label tuna comes from and how it's caught (with varying degrees of success), and they defend its sustainability proudly when asked. And when we point to the brand-name products sitting right next to those shiny, sustainable own-label tins? Radio silence, confusion, endless obfuscation or – worst of all – open acknowledgement of their double standards. But I'm getting ahead of myself. With the results of BLOOM's highly technical retailer ranking system available to all, I've chosen to stick to a slightly less technical emoji system in the following sections. That said, we do have a clear winner and an even clearer loser in the UK, with the remaining eight existing somewhere in between.



THE GOOD...



Marks & Spencer gets a gold star. It is one of the only retailers in our study that managed to avoid the hypocritical own-label vs. brand-name double standard.

How did they manage it? By not selling brand-name tuna at all. In response to our letters, a representative informed us that "100% of all tuna species (across all categories) sourced and sold by M&S are caught by line caught methods only. None of these line capture methods use drifting FADs and none are caught by purse seine. We are also the only retailer in the UK who has 100% line caught tuna species across all categories as we only sell own label". This checked out in-store and is echoed in the sourcing policy which clearly states that "all skipjack tuna destined for Marks & Spencer product must be caught by pole and line"³⁰. Their representative also provided comment on the worrying situation in the Indian Ocean, saying: "We fully supported the recent vote in the IOTC for a restriction on the use of drifting FADs in the Indian ocean purse seine fishery". Finally, M&S confirmed their support of our work highlighting the risks associated with drifting FADs and was one of only two retailers to disclose the volumes of tuna sold.

"100% of all tuna species (across all categories) sourced and sold by M&S are caught by line caught methods only. None of these line capture methods use drifting FADs and none are caught by purse seine. We are also the only retailer in the UK who has 100% line caught tuna species across all categories as we only sell own label".



"We fully supported the recent vote in the IOTC for a restriction on the use of drifting FADs in the Indian ocean purse seine fishery".

THE BAD...



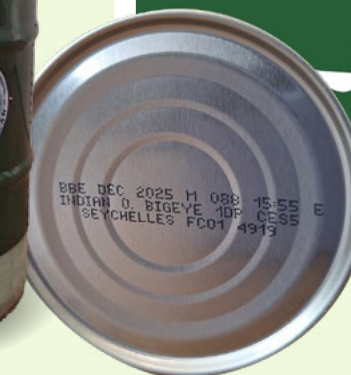
It's a good thing that emoji is censored. I have nothing good to say about Iceland and its non-existent canned tuna sourcing policy. We sent six emails and three letters to Iceland and received one email containing two lines in response. One of those lines was a greeting and the other was as follows: *"We do not sell any own-label canned tuna and would not be able to share the commercially sensitive sales information outlined in the letter. The additional information you are requesting would be best raised with the brand owners."* Spoiler alert: this will not be the last time you see retailers trying to shirk their responsibilities to the public and to the environment by implying that the tuna they sell on their shelves to their customers is somehow not their problem.

"We do not sell any own-label canned tuna and would not be able to share the commercially sensitive sales information outlined in the letter. The additional information you are requesting would be best raised with the brand owners."



In stark contrast to M&S, Iceland only sells brand-name tinned tuna. I visited a few stores and found only John West. I picked up a four-tin multi-pack and decided to try and make use of John West's "Trace your Can" function – a page on their website where you can enter the barcode number and the can code and, in theory, it tells you which FAO ocean region your tuna came from and which vessel caught it. Worryingly, the pack I picked up contained Indian Ocean bigeye tuna – a stock that is currently overfished. Bigeye was only declared overfished in the past year, so it's not clear whether this fish was caught before or after the new stock status was announced. Regardless, it's upsetting to see a fish that could have lived for a more than decade and weighed over 180kg caught as baby and relegated to a tin "ideal for sandwiches". Of course, I can't be sure exactly how this tin of Indian Ocean bigeye was caught because John West's tracing system told me that *Zeeland* was one of the boats that supplied the batch, which seems unlikely given that *Zeeland* is a Dutch trawler³¹, not a purse seiner,

has not been anywhere near the Indian Ocean and has never existed on the IOTC's vessel register. John West's tracking system might be defective, but at least they acknowledge³² the negative impact of FADs associated with this stock (not quite enough to get them to stop selling it though, it seems). In a truly baffling move, Iceland has chosen to take a stand on FAD-caught tuna steaks on their website, saying: *"One of the principal concerns regarding tuna fishing is the inadvertent capture of sea mammals and other fish. This has often been linked with practices including the use of fish aggregating devices (FADs). For this reason, all Iceland own brand tuna steaks must be sourced from fisheries employing line and pole or hand line fishing methods and not using FADs."*³³ The fact that this policy does not apply to the tuna most often caught around drifting FADs – ie. tinned tuna – is outrageous. This sentiment is echoed in BLOOM's report, in which Iceland scored an appropriate 0.6/10 and 1.7/10 for cooperation and policy respectively³⁴.



AND EVERYTHING IN BETWEEN

The remaining eight of the UK's "big ten" supermarkets have been lumped together because, despite their many differences, they share a common attribute – their brand-name canned tuna sourcing policy is either insufficient or non-existent. Waitrose came this close 🙅 to avoiding being placed in this category as they only sell pole and line-caught tuna in their own-label cans – a policy that has been in place since 2009. They were also highly responsive to our letters and, unlike most of the other retailers, were very forthcoming about their brand-name tuna policy issue, saying: *"we believe that we are the only UK retailer to have a policy for branded canned tuna: we only permit pole and line caught or MSC certified sources."* I had a look at some of their MSC-certified John West tuna in a store near my home and figured I'd give John West's "Trace your Can" function another go. I could tell from the trusty inkjetting (see below) that the tuna was skipjack, caught in the Indian Ocean. Unfortunately, this was contradicted by the online traceability function, which seemed convinced that the fish was caught near Ghana.



"All our own-label skipjack tuna is responsibly caught using pole-and-line methods, and we support the Greenpeace campaign to end the sale of tuna caught with the use of both fish aggregation devices and purse seining, which increases bycatch."

However, the vessel name rang true. *Alakrana* is a huge purse seiner and part of the MSC-certified Spanish Echebaster fleet – the first ever purse seine fishery using drifting FADs to be certified by the MSC. Fun fact about Echebaster: at the time of certification, the fishery caught more overfished yellowfin tuna than it did skipjack (the species that was being certified).³⁵ Not only is it incredibly disappointing to see a company like Waitrose selling tuna from the Indian Ocean caught on drifting FADs, but it's also wildly hypocritical, given that their fish and seafood webpage states the following:

*"All our own-label skipjack tuna is responsibly caught using pole-and-line methods, **and we support the Greenpeace campaign to end the sale of tuna caught with the use of both fish aggregation devices and purse seining, which increases bycatch.**"³⁶* If Waitrose really wanted to end the sale of tuna caught around drifting FADs, they could probably start by ending their sale of tuna caught around drifting FADs. As a sidenote, the Greenpeace campaign they're referring to is probably this one from more than a decade ago when Princes and John West promised to phase out their use of FADs!



Like Waitrose, the Co-op also has a policy of only selling pole and line-caught tuna as part of its own-label offering³⁷. Sainsbury's new policy was communicated to us in response to our letters and consists only of pole and line or troll-caught MSC-certified tuna, while Morrisons' own-label policies require either pole and line or FAD-free tuna. Morrisons explains the reasoning behind this in their fishing policy: *"FADs are floating objects used by fishermen to attract local populations of fish, however they have been associated with pollution, entanglement of valuable marine species and unwanted bycatch"*³⁸.

"FADs are floating objects used by fishermen to attract local populations of fish, however they have been associated with pollution, entanglement of valuable marine species and unwanted bycatch"

Indeed, they have, but that has not stopped all three of these retailers from closing their eyes and blocking their ears to the double standards and selling brand-name tuna caught using drifting FADs, as their commitment to sustainability extends only as far as their own-label, and no further. The Co-op also proudly limits its own-label tuna to skipjack but has no qualms about selling John West Indian Ocean bigeye. However, all three were very responsive, with Sainsbury's being one of only two UK retailers to provide us with sales volumes by species.

In our correspondence, a representative from the Co-op also stated that their branded (John West) tuna must come from an MSC-certified fishery or a fisheries improvement project (FIP). The Co-op is by no means the only retailer to take advantage of the greenwashing power of FIPs – at least eight out of ten do.

In theory, fisheries improvement projects are meant to bring together stakeholders in a fishery to improve its sustainability, with the goal of having it enter and achieve MSC certification. In reality, however, they are used as a faux certification by brands and retailers alike, regardless of how distant and unrealistic a prospect actual improvement, sustainability or certification is. Both Princes and Thai Union (ie. John West) are stakeholders in the Sustainable Indian Ocean Tuna Initiative (SIOTI) purse seine FIP which includes both Indian Ocean yellowfin and bigeye tuna – the latter of which I found in several Co-op stores. The FIP was set up in 2017. Since then, Indian Ocean yellowfin tuna has been relentlessly overfished with no end in sight and bigeye has moved from “not overfished” to “overfished and subject to overfishing”, and *still* the FIP is rated “A”³⁹ which I can only assume stands for “absolutely useless” or “a complete sham”.

Tesco calls itself the UK's biggest fishmonger. As the country's largest retailer, in control of 20% of the UK's retail seafood market share⁴⁰, that description makes sense. What makes less sense is Tesco's communication of its canned tuna sourcing policy. In response to our first letter, we received this response from Tesco's customer service team:



09/06/2023

Blue Marine Foundation
South building
Somerset House
Strand
London
WC2R 1LA
United Kingdom

TESCO

Customer Engagement Centre
Baird Avenue
Dundee
DD2 3TN

Case ID: 5617890

Dear Blue Marine Foundation,

Thank you for contacting Tesco.

I appreciate you taking the time to bring your concerns to our attention in relation to the sourcing of tinned tuna.

Our customers care about how we source our tinned tuna and so do we. 100% of our own-brand canned tuna is caught using sustainable pole and line fishing methods. We continue to work hard with our supplier partners and our own experts, to ensure that at Tesco, customers have a great choice of seafood that is both sustainable and affordable.

Unfortunately, this was contradicted by Tesco's online policy which states that all of their UK canned tuna is “either pole and line, FAD-free or MSC-certified”⁴¹. As has already been explained, MSC-certified could easily include tuna caught around FADs in the overfished Indian Ocean and elsewhere, making this a disappointing policy for the UK's largest retailer. However, this position was complicated further by communication with a sustainable fisheries and aquaculture representative who stated that “Our policy clearly states we do not source own brand tuna from the Indian Ocean and do not allow the use of FADs in our sourcing.” Not only does Tesco's

sourcing policy *not* state that clearly (or at all, from what we can tell), but the situation is complicated even further by Tesco's bycatch audit from August 2022, which highlighted that “tuna fisheries utilizing longlines and purse seine gears utilizing fish aggregating devices (FADs) pose a significant risk to sharks and rays”⁴² under the ‘key findings’ section. We asked for clarity on this but did not receive a response from the UK's biggest fishmonger. Regardless of what Tesco's true own-label sourcing policy may be, their brand-name tuna policy is a great deal simpler, in that it doesn't appear to exist.



While Aldi's policy is very similar to (one of) Tesco's, unlike Tesco, Aldi's policy is clear, if not great. Aldi prioritises MSC-certified tuna but will also allow pole and line, handline or FAD-free purse seine-caught tuna for its own-label products. The only rule governing Aldi's brand-name tuna is that there are no rules, resulting in the presence of Indian Ocean tuna in the form of both Princes and John West. The exact same *laissez-faire* approach to brand-name tuna has been adopted by both Lidl and Asda, with plenty of John West Indian Ocean bigeye, now deemed to be overfished, on the latter's shelves. Both Lidl and Asda also have similarly

poor own-label sourcing policies, with Asda listing pole and line and FAD-free as options, but then shooting themselves in the foot by throwing in drifting FAD-associated fisheries too, just as long as they're in a FIP. Worst of all, Asda's own-label tins of tuna do not state how the tuna was caught – this is rare for an own-label product in the UK (although standard practice for both Princes and John West). Online, Lidl's policy looks ever so slightly more promising, listing pole and line, FAD-free purse seine or MSC-certified tuna. However, correspondence with a Lidl representative also added tuna from a FIP to the mix, making it in equal parts unclear and unambitious.

CONCLUSION

Predatory fish like tuna play an essential role in maintaining balanced, healthy ocean ecosystems. When two out of three of an ocean's tropical tuna stocks are overfished, alarm bells should be ringing. And they are ringing, especially in coastal communities who depend heavily on tuna for food security and livelihoods. I have heard first-hand from small-scale tuna fishermen in Kenya about how much further out to sea they are having to travel to find fish and the devastating effects that a stock collapse would have on their fishing communities and their ability to afford food, children's education and healthcare. However, these alarm bells don't appear to be echoing as loudly through the halls of the European Commission. Perhaps it's because Brussels is a very long way away from the Indian Ocean, or maybe eight years of ongoing overfishing isn't that alarming to commercial tuna fleets that can just pick up and move to another ocean when the entire tuna cake is gone – a luxury not afforded to small-scale coastal fleets who will be left with nothing but crumbs.

Of course, the EU is not the only member of the IOTC responsible for this crisis. We often see the EU's delegation to the IOTC pointing fingers at other countries who have increased their catches or objected to tuna conservation measures (even UK retailers could learn a thing or two about hypocrisy and double standards from the European Commission). And they're not wrong – countries like Oman and Tanzania missed out on the decades of industrial-scale over-exploitation taking place in their backyard and have had the audacity get in on the action now. The EU and the purse seine industry also frequently point to potential improvements to the design of drifting FADs, from biodegradability to non-entangling designs, the latter of which is meant to have been in place at the IOTC since 2020. However, none of the drifting FADs collected on the shores of IOTC coastal states by a University of Exeter FAD recovery project have been compliant with existing IOTC FADs regulations.⁴³ Regardless, these "improvements" would not solve the key issue – that drifting FADs result in the capture of millions of overfished yellowfin and bigeye tuna.

Despite the highly damaging nature of drifting FADs, the EU appears determined to defend its industrial commercial fleet to the bitter end, to the detriment of the region's tuna populations and every other country that depends on them. But the rest of us don't have to, and neither do our retailers. All but one of the UK's top ten supermarkets are currently tainted by the impacts of Indian Ocean drifting FADs, either through irresponsible own-label sourcing or through the brand-name canned tuna they choose to sell – there is no difference. The responsibility for every tin of tuna sold to the public lies with the retailer that sold it.

We therefore call on UK retailers to stop selling tropical tuna caught around drifting FADs in the Indian Ocean by not entering into any new supply agreements for tuna caught in this way. This policy should extend to both own-label tuna and branded tuna products.

REFERENCES

- Urbina, I. (2023). The crimes behind the seafood you eat. *The New Yorker*. <https://www.newyorker.com/magazine/2023/10/16/the-crimes-behind-the-seafood-you-eat>
- Fiorillo, J. & Sapin, R. (2023). High Liner cuts ties with Chinese company implicated in forced labor investigation. *IntraFish*. <https://www.intrafish.com/processing/high-liner-cuts-ties-with-chinese-company-implicated-in-forced-labor-investigation/2-1-1533456>
- Seafish (2023). Outlaw Ocean investigation into Chinese seafood processors. <https://www.seafish.org/about-us/news-blogs/outlaw-ocean-investigation-into-chinese-seafood-processors/>
- IOTC (2022). Report of the 25th Session of the IOTC Scientific Committee. <https://iotc.org/documents/SC/25/RE>
- IOTC (2021). Report of the 24th Session of the IOTC Scientific Committee. <https://iotc.org/documents/SC/24/RE>
- IOTC datasets (2023). <https://iotc.org/data/datasets> Accessed: 29/10/2023
- See: Sinan, H. & Bailey, M. (2020). Understanding Barriers in Indian Ocean Tuna Commission Allocation Negotiations on Fishing Opportunities. <https://www.mdpi.com/2071-1050/12/16/6665>
- Tidd, A.N., Floc'h, L., Imzilen, T., Tolotti, M., Dagorn, L., Capello, M. & Guillotreau, P. (2023). How technical change has boosted fish aggregation device productivity in the Indian Ocean tuna fishery. <https://www.nature.com/articles/s41598-023-45112-4>
- Global Tuna Alliance (2021). Sustainability of yellowfin tuna (*Thunnus albacares*) fisheries in the Indian Ocean, with a special focus on juvenile catches. <https://www.globaltunaalliance.com/wp-content/uploads/2022/03/Naunet-Fisheries.2021.V3-new.pdf>
- Ziegler, I. (2022). Assessing the impact of drifting FADs on silky shark mortality in the Indian Ocean. <https://iotc.org/documents/WGFAD/03/10>
- Escalle, L., Muller, B., Vidal, T., Hare, S., Hamer, P. & the PNA Office (2021). Report on analyses of the 2016/2021 PNA FAD Tracking Programme. <https://meetings.wcpfc.int/node/12589>
- European Commission (2023). Our Ocean Conference: EU announces €816.5 million worth of commitments to protect the ocean. https://ec.europa.eu/commission/presscorner/detail/en/ip_23_1290
- European Commission (2022). Green Deal: EU announces €1 billion worth of commitments to protect the ocean. https://ec.europa.eu/commission/presscorner/detail/en/IP_22_2398
- Roussi, A. & Guillot, L. (2023). Fishy business: EU flashes green money to support Indian Ocean tuna grab. *Politico*. <https://www.politico.eu/article/environmental-cash-for-fish-eu-flashes-green-money-to-support-indian-ocean-tuna-grab/>
- Kenya's submission to the IOTC (2022). Systematic non-compliance of drifting fish aggregating devices (dFADs) with Resolution 19/02 'Procedures on a Fish Aggregating Devices (FADs) Management Plan'. <https://iotc.org/documents/systematic-non-compliance-drifting-fish-aggregating-devices-dfads-resolution-1902->
- BLOOM Association (2023). Lining up the ducks: Industrial tuna fishing lobbies line up their political allies to defend their destructive practices in Africa. https://bloomassociation.org/wp-content/uploads/2023/04/Lining-up-the-ducks_EN.pdf
- Somalia's submission to the IOTC (2023). Withdrawal of Somalia's objection to IOTC Resolution 23/02. <https://iotc.org/documents/withdrawal-somalia%E2%80%99s-objection-iotc-resolution-2302>
- Blue Marine Foundation (2023). Legal action launched against the European Commission for its objection to IOTC FADs resolution. <https://www.bluemarinefoundation.com/2023/05/10/legal-action-launched-against-the-european-commission-for-its-objection-to-iotc-fads-resolution/>
- See: <https://harveststrategies.org/blog/2022/12/06/the-msc-fisheries-standard-3-0-new-but-perhaps-not-improved/>
- The Outlaw Ocean Project (2023). A synopsis of the investigation's conclusions. <https://www.theoutlawocean.com/investigations/china-the-superpower-of-seafood/findings/>
- The three reports are as follows: BLOOM Association (2023). The Death Label: The MSC's fake sustainability but true destruction of tuna populations. <https://bloomassociation.org/wp-content/uploads/2023/09/msc-tuna-fisheries.pdf> ; On The Hook (2023). On The Hook External Review of the Marine Stewardship Council (MSC). https://onthehook.org.uk/wp-content/uploads/2023/07/MarFishEco_On-the-Hook-External-Review-of-MSC_June_23_FINAL-2.pdf ; Shark Guardian (2023). Behind the MSC blue tick. <https://www.sharkguardian.org/post/behind-the-msc-blue-tick>
- House of Commons (2018). Environmental Audit Committee: Oral evidence: Sustainable Seas. <https://committees.parliament.uk/oralevidence/8382/html/>
- Chapman, B. (2018). Tesco, Marks & Spencer and Waitrose voice major concerns about sustainability of tuna fisheries. *The Independent*. <https://www.independent.co.uk/climate-change/news/tuna-fishing-sustainable-questions-tesco-marks-spencer-waitrose-overfishing-dolphins-sharks-turtles-a8163956.html>
- Marine Stewardship Council (2020). Board decision on Standards Review. <https://www.msc.org/media-centre/news-opinion/news/2020/02/07/board-decision-on-standards-review>

- 25 Navarro, L. (2019). New ICES report re-opens debate over MSC-suspended mackerel fishery. *IntraFish*. <https://www.intrafish.com/fisheries/new-ices-report-re-opens-debate-over-msc-suspended-mackerel-fishery/2-1-582453>
- 26 Marine Stewardship Council (2016). Small islands, big opportunities. <http://pna-stories.msc.org/>
- 27 Dasgupta, S. (2023). Report: Half of MSC-certified 'sustainable' tuna caught with controversial gear. *Mongabay*. <https://news.mongabay.com/2023/10/report-half-of-msc-certified-sustainable-tuna-caught-with-controversial-gear/>
- 28 Marine Stewardship Council (2022). MSC UK Tuna Shopper Report. <https://www.msc.org/docs/default-source/default-document-library/stakeholders/tuna-news/msc-uk-and-ireland-tuna-shopper-report-2022.pdf>
- 29 Watson, R. (2023). Seafood in multiple retail (2023 update). *Seafish*. <https://www.seafish.org/document/?id=de43ad02-7792-4356-af4f-ebe9ec29dc3d>
- 30 Marks & Spencer (2019). Seafood Sourcing Standard. https://corporate.marksandspencer.com/sites/marksandspencer/files/2022-08/ms_sourcing_standard_seafood.pdf
- 31 Letcher, L. (2022). Anger as 'world's biggest' supertrawlers The Zeeland and The Afrika fish off Cornwall. *Cornwall Live*. <https://www.cornwalllive.com/news/cornwall-news/anger-worlds-biggest-supertrawlers-fish-6471535>
- 32 Thai Union. Sourcing transparency: Wild caught fish and shellfish. https://seachangesustainability.org/wp-content/uploads/TUG_TRANSPARENCY_R14.pdf
- 33 Iceland. Sustainable Fish: Responsible sourcing from sea to shelf. <https://sustainability.iceland.co.uk/our-planet/sustainable-sourcing/sustainable-fish/>
- 34 BLOOM Association (2023). Willful Ignorance: How European retailers turn a blind eye to the social-ecological destructiveness of tuna fisheries. <https://bloomassociation.org/wp-content/uploads/2023/11/Willful-ignorance.pdf>
- 35 Acoura (2018). MSC sustainable fisheries certification. Echebatar Indian Ocean Skipjack Tuna Purse Seine Fishery: Public Certification Report. <https://fisheries.msc.org/en/fisheries/echebatar-indian-ocean-purse-seine-skipjack-tuna/@assessments>
- 36 Waitrose. Fish and seafood. <https://www.waitrose.com/ecom/content/sustainability/responsible-sourcing/fish-and-seafood>
- 37 The Co-op. Responsibly sourced fish. <https://www.coop.co.uk/our-suppliers/farmers/fish>
- 38 Morrisons. Fishing Policy: Wild caught seafood. <https://www.morrisons-corporate.com/morrisons-sustainability-old/policies/fishing-policy/wild-caught-seafood/>
- 39 FisheryProgress.org (2023). Indian Ocean tuna - purse seine (SIOTI). <https://fisheryprogress.org/fip-profile/indian-ocean-tuna-purse-seine-sioti>
- 40 Welling, D. (2023). Discounters Aldi and Lidl now control nearly a quarter of the UK's retail seafood market share. *IntraFish*. <https://www.intrafish.com/markets/discounters-aldi-and-lidl-now-control-nearly-a-quarter-of-the-uks-retail-seafood-market-share/2-1-1467306>
- 41 Tesco (2021). Sourcing seafood responsibly - UK Position Statement. <https://www.tescopl.com/sustainability/documents/policies/sourcing-seafood-responsibly-uk-position-statement>
- 42 Tesco (2022). Protecting Ocean Wildlife in Tesco's Seafood Supply Chain. <https://cdn2.assets.servd.host/ocean-disclosure/production/assets/images/FINAL-Tesco-Bycatch-Audit-SUMMARY-1.pdf>
- 43 IPNLF submission to the IOTC (2023). Sustained systematic non-compliance of drifting fish aggregating devices (dFADs) with Resolution 19/02 'Procedures on a Fish Aggregating Devices (FADs) Management Plan'. https://iotc.org/sites/default/files/documents/2023/04/IOTC-2023-CoC20-INF01_Rev1_-_Information_paper_to_the_IOTC_Compliance_Committee_on_dFADs.pdf



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