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London, 4 August 2023

CIRCULAR TO UK RETAILERS SELLING CANNED TUNA

Dear Sir/Madam,

Our three organisations have been engaging with large UK retailers since May 2023 regarding the ongoing mismanagement of industrial tuna fisheries as well as the many social and environmental issues associated with them. In addition to informing retailers of the sustainability concerns throughout the tuna value chain, we also requested relevant sourcing information from them, in order to ensure that they were not implicated in the ongoing overfishing of tuna stocks, especially in the Indian Ocean.

UK retailers have the power to radically transform the tuna industry. By engaging with their suppliers, setting responsible standards, and carefully monitoring changes, UK retailers are able to implement necessary and lasting change.

In this circular, addressed to UK retailers, we aim to provide some feedback on the responses we have received and to explain the urgent steps necessary to limit the negative environmental impact of the UK's canned tuna supply.

Based on the responses from UK retailers that we have received over the past two months, we feel it is important to clarify the following points regarding sustainable tuna procurement practices:

- Given the current state of tuna fisheries, we consider that it is of primary importance that retailers possess detailed supply chain information and data regarding their canned tuna offer. This should include both own-label and branded products, as the sustainability of brand-name tuna is no less important than that of retailers' own-label products, and the same sourcing criteria should apply to both.

- Several retailers have pointed to the Marine Stewardship Council (MSC) certification of their tuna as a guarantee of its sustainability. However, MSC certification has been shown to no longer be a reliable mark of environmental sustainability¹. This is especially relevant when it comes to tuna fisheries, as highlighted by the recent growth in MSC-certified fisheries that use harmful drifting fish aggregating devices (FADs)², as well as the certification of tuna fisheries that target stocks that are still in recovery³. Additionally, MSC certification does not guarantee that tuna has come from a well-managed stock, given the number of certified fisheries that exist without harvest strategies⁴.
- Similarly, the inclusion of tuna fisheries improvement projects (FIPs) in a retailers' sourcing policies is even less of a reliable sustainability indicator. FIPs are programs aimed to improve environmentally sustainable practices where these are lacking, not certifications in and of themselves. Using the FIP designation as an indicator of product sustainability is therefore highly problematic.

More specifically, our previous letters to UK retailers detailed the many harmful impacts associated with drifting FADs. Not only are drifting FADs lost or discarded in their thousands⁵, resulting in plastic pollution and damage to sensitive marine habitats, but countless endangered, threatened and protected species also fall victim to drifting FADs, either as bycatch or through entanglement⁶. Non-mesh, non-entangling and biodegradable drifting FADs have been put forward as possible solutions to these issues⁷. However, these alternatives do not solve the most pressing environmental problems associated with drifting FADs. **Drifting FADs are responsible for the mass capture of juvenile bigeye and yellowfin tuna.** This is of particular concern in the Indian Ocean where both species are overfished and where studies have shown that 97% of the yellowfin tuna caught around drifting FADs by purse seine vessels are juveniles⁸.

While removing plastic from drifting FADs and making them non-entangling is indeed necessary, these steps will not solve the intrinsic issues associated with drifting FADs: that they will continue to facilitate the capture of millions of immature tunas, as well as other vulnerable marine species, regardless of the materials used. Additionally, a report submitted by Kenya to the 19th Session of the

¹ See for example: Make Stewardship Count (<https://www.make-stewardship-count.org>) and On the Hook (<https://onthehook.org.uk>) campaigns for a detailed overview of the topic, as well as the recent External Review of the Marine Stewardship Council (https://marinestewardshipreview.org/wp-content/uploads/2023/06/MarFishEco_On-the-Hook-External-Review-of-MSC_June_23_FINAL.pdf?v=1).

² Such as the AGAC four oceans Integral Purse Seine Tropical Tuna Fishery (<https://fisheries.msc.org/en/fisheries/agac-four-oceans-integral-purse-seine-tropical-tuna-fishery/>)

³ Such as the Usufuku Honten Northeast Atlantic longline bluefin tuna fishery (<https://fisheries.msc.org/en/fisheries/usufuku-honten-northeast-atlantic-longline-bluefin-tuna-fishery/>). See also: https://wwf.panda.org/wwf_news/?1011266/New-flawed-MSC-certification-of-bluefin-tuna-risks-reaching-the-Mediterranean-market-warns-WWF

⁴ See for example: <https://www.msc.org/species/tuna/western-central-pacific-ocean-tuna-fisheries-explainer> and <https://www.msc.org/standards-and-certification/developing-our-standards/the-fisheries-standard-review/projects/reviewing-principle-1-harvest-strategies>

⁵ In some regions, the retrieval rate of drifting FADs is less than 10% (Escalle, B Muller, T Vidal, S Hare, P Hamer & the PNA Office (2021). Report on analyses of the 2016/2021 PNA FAD Tracking Programme. Available: <https://meetings.wcpfc.int/node/12589>)

⁶ A recent study estimated that at least 100,000 silky sharks end up as bycatch in the Indian Ocean purse seine industry alone each year (I Ziegler (2022). Assessing the impact of drifting FADs on silky shark mortality in the Indian Ocean. Available: <https://iotc.org/documents/WGFAD/03/10>)

⁷ See for example: <https://www.iss-foundation.org/fishery-goals-and-resources/our-best-practices-resources/non-entangling-and-biodegradable-fads-guide/>

⁸ Global Tuna Alliance (2021). Sustainability of yellowfin tuna (*Thunnus albacares*) fisheries in the Indian Ocean, with a special focus on juvenile catches. Available: <https://www.globaltunaalliance.com/wp-content/uploads/2022/03/Naunet-Fisheries.2021.V3-new.pdf>

Indian Ocean Tuna Commission's (IOTC's) Compliance Committee shows that none of the drifting FADs opportunistically recovered from the Western Indian Ocean region since January 2020 showed full compliance with IOTC Resolution 19/02 which mandates non-entangling designs^{9,10}.

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-brand tuna and branded tuna products.

The use of drifting FADs in the Indian Ocean is particularly alarming, given the ongoing overfishing of tropical tuna stocks in the region. However, drifting FADs are harmful wherever they are used, and other oceans should be included in this measure over time. We also encourage retailers to obtain proof that FAD-free tuna is in fact fished without the use of drifting FADs through audit processes and/or other supply chain assessments so as to ensure robust traceability.

Taking this step will help to ensure that UK retailers are minimising their contribution to the overfishing of tropical tuna stocks in the Indian Ocean and, ultimately, to the global loss of marine biodiversity.

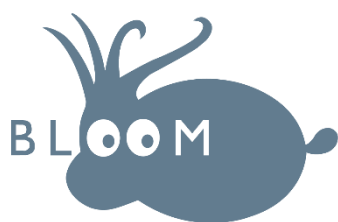
Mindful of the obligations stipulated in the Groceries (Supply Chain Practices) Market Investigation Order 2009 (GSCOP) and of the need to honour existing contracts, our organisations call on UK retailers to abide by this call as soon as their current supply agreements expire.

In the interest of the conservation of tuna stocks, we are depending on UK retailers' support to tackle this important issue and look forward to your cooperation with the call to action outlined above. We would appreciate your comment or commitment in response to this circular by **September 4th, 2023**.

We look forward to working together to shape the future of sustainable tuna fisheries and remain available to discuss this matter, should you have any questions.

Sincerely,

BLOOM Association, Blue Marine Foundation and Greenpeace UK



⁹ See IOTC Resolution 19/02: <https://iotc.org/cmm/resolution-1902-procedures-fish-aggregating-devices-fads-management-plan>

¹⁰ IOTC (2022). Systematic non-compliance of drifting fish aggregating devices (dFADs) with Resolution 19/02 'Procedures on a Fish Aggregating Devices (FADs) Management Plan'. Available: <https://iotc.org/documents/systematic-non-compliance-drifting-fish-aggregating-devices-dfads-resolution-1902->