

# Listing of Atlantic Bluefin Tuna as an endangered species



Statement regarding the proposal to list Atlantic Bluefin Tuna on CITES  
Appendices

Atlantis Group is among the world leaders in the farming and distribution of Bluefin Tuna. The company's for around 8% of the annual import of Bluefin Tuna to the Japanese market.

The company acknowledges the urgent need to re-build the Atlantic Bluefin Tuna (ABFT) stock and the grave situation brought on by decades of overfishing and lax control mechanisms. The company views, alternate measures, other than an international ban on trade as the way forward in this matter.

Having agreed with requirement quotas within scientific advice and stricter control mechanisms in the fishing of Atlantic Bluefin Tuna on the ICCAT front, the company welcomes the measures taken by ICCAT in the past two years, however it strongly advises against the listing of a commercial fish stock on a list of endangered species and banning the trade of the species.

Although the decades of ICCAT's mismanagement can not be disputed, the organization has already shown its capacity for change in several very important ways. The most important elements of which are the: strengthened control mechanisms, significant strengthening of compliance measures, adherence to scientific advice when issuing quotas and increased power given to the SCRS, ICCAT's scientific board. SCRS has been given the authority to halt fishing if stock assessment points towards the collapse of the stock. This makes a listing on CITES Appendix I or II unnecessary.

Resorting to the extreme measure of listing commercially fished species on a list of endangered species carries with it the risk of the subsequent listing of over a further 100 species. This would move the right of controlling a vital protein source for the world from those who carry a long term interest in the sustainable use of the species to those who don't. This will empower CITES at the cost of local governments and RFMO's.

There are already comparable examples of stock recovery through proper fisheries management, one such example is the Icelandic cod stock, where the stock has grown by 73.6% in the last 26 years through the restructure of the Icelandic fisheries management system.

The drive to list the ABFT as an endangered species has been controlled by environmental NGO's with unlimited financial resources. They have systematically distributed lies and disinformation in the world's media and created a mass hysteria, all the while interpreting scientific data in a very creative manner. The call for a "*quick fix*" to solving the problems of the ABFT must be answered soberly with a long term solution to the sustainable use of the species, empowering ICCAT to do it's job properly.

Following is a more detailed version of our statement.

## **1. An Appendix listing of a commercial fish species would put governance of other commercial fishing stocks at risk**

Local governments or Regional Fisheries Managements Organizations govern commercial fish stocks. The success of those varies from stock to stock. Research shows that the most successful form of fisheries management is a Catch Shares system<sup>1</sup>. Numerous success stories prevail on how stocks have been rebuilt using a Catch Share system.

In 1955 the spawning stock biomass (SSB) of the Icelandic cod was estimated at 938.000 tons<sup>2</sup>. In 1984 the estimate was 141.000 tons, a dramatic 85% decline in the stock and a change large enough to list the species on CITES' Appendix I. This was a result of a huge mismanagement of the fisheries and overfishing between 1950-1984.

An Appendix I listing did not happen at that time. What however did happen was that Iceland reshaped its fisheries management system and immediately took significant steps towards rebuilding the Cod stock between 1984 and 1991.

Instrumental in this was the presentation of an Independently Transferable Quota (ITQ or Catch share) system and consequently tough measures to tackle IUU and compliance to rules. Scientific advice has since been the basis of annual Total Allowable Catch, issued by the Ministry of Fisheries.

The stock has since recovered and is currently around 250.000 tons, having grown by 73.6% in 26 years.

This is not the only case of a stock on the brink of collapse where firm steps are taken to successfully re-build the stock. It is our view that it would not be in the benefit of the ABFT stock to list it as an endangered species and measures taken by the respective RFMO would work far better in preserving the stock for future generations.

## **2. ICCAT has sufficient measures to rebuild the ABFT stock**

The listing of a commercial fish species on a list of endangered species would carry the threat of the concurrent listing of a large number of species.<sup>3</sup>

This would dramatically alter the current system of fisheries management throughout the world, shifting power from those who have a long-term interest in the sustainable utilization of the stocks to those who don't.

The decades of mismanagement of the ABFT stock by ICCAT is not a matter of dispute. However, this should be dealt with by the contracting parties of ICCAT and by the

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1. <http://www.edf.org/article.cfm?contentID=8446>

2. The Association of Icelandic Fishing Vessels Owners, [www.liu.is](http://www.liu.is).

3. FAO: General situation of world fish stocks, <http://www.fao.org/newsroom/common/ecg/1000505/en/stocks.pdf>

individual countries concerned, where as for example EU holds 60% of the ICCAT quota for ABFT. Thus the EU has significant power to control the fishing within ICCAT and both the fishing and trade within EU.

Although much can be said about the lax control by ICCAT during the last decades, the reforms of the organization during the past few years have been significant. ICCAT has now created a realistic and well-achievable plan to re-build the stock of ABFT within the space of in ten years and have already taken strident measures in this direction and has the power to do more:

### **2.1 Quotas are now set within the advice of scientists**

In November 2009 ICCAT at last set the Total Allowable Catch limit to a number within the advice of its scientific board, SCRS. The quota for 2010 was set at 13.500 tons.

### **2.2 According to SCRS, steps taken in 2008 had significant positive effects on the controls IUU (illegal, unreported and unregulated fishing) of ABFT**

In it's October 2009 report, SCRS<sup>4</sup> concludes that 2008 saw next to none IUU activity of ABFT. This is due to much stricter control mechanisms and increased patrolling on the seas. Truly a remarkable achievement in just one year. More steps are being taken to ensure this state will be permanent.

### **2.3 Measures have been taken by ICCAT to limit fleet capacity to TAC**

In the November 2009 meeting of ICCAT one of the main achievements was the decision to limit fleet size to total allowable catch. This motion is currently being implemented by coastal nations. This will eventually mean that the fleet will be aligned with Total Allowable Catch limits, hence minimizing risk of IUU.

In addition to this, since 2005, the fishing season for the purse seiners in the Mediterranean has been reduced from 11 months to only 1 month a year, thus, the fishing capacity on an annual basis is only 9% of what the fishing capacity was 5 years ago without even taking into account other measures in fleet capacity reductions.

### **2.4 Individual nations have implemented Catch Shares systems for the ABFT**

Individual nations within ICCAT have also taken measures to control the fishing by implementing a system of Catch Shares (Independent Transferable Quota - ITQ), a system proven to be the best in controlling fishing and re-building stocks. This system has proven itself to be extremely effective in the re-building of the Icelandic Cod, as previously mentioned. A Research by Christopher Costello et al. looking into 11.135 fisheries from 1950-2003 concluded:

*"the results of this analysis suggest that well-designed catch shares may prevent fishery collapse across diverse taxa and ecosystems"*<sup>5</sup>

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4. REPORT OF THE STANDING CO STATISTICS COMMITTEE ON RESEARCH AND (SCRS)BFTE Figure 1, pg. 84

## **2.5 ICCAT has the power to issue a zero quota while stock size is uncertain**

The most accurate information available at any time on the state of the ABFT is gathered and presented by SCRS. In November 2009 the ICCAT general meeting gave SCRS the authority to immediately cease all fishing of ABFT. This gives total power to the scientific board, the boldest move by ICCAT to date.

Adding to this, ICCAT could at its November 2010 meeting in Paris issue a zero quota on the ABFT, effective until a solid stock assessment, based on measurements, is in place, not only within Atlantic waters but the Mediterranean too.

## **3. Direct negative effects**

### **3.1 Closing down fishing of the species would greatly diminish funds for stock assessment, which is badly needed to get a scientifically acceptable assessment of the existing biomass**

As commercial interest in ABFT would disappear, the ABFT industry would cease to exist. Industry backed research into the species and SCRS data gathering from the fisheries would be a thing of the past. The governments of coastal nations would have no reason to continue funding stock assessments. This would over time severely decrease the existing knowledge of the species.

SCRS claims its inability to create a viable assessment on the stock size in 2009 due to a lack of scientific data from fisheries.<sup>6</sup> What kind of information will be available once the legal fishermen are no longer out there fishing for the tuna? What kind of funding will be available for stock assessments?

### **3.2 Closing down legal fisheries creates a huge opportunity for IUU in the Atlantic and Mediterranean Oceans**

With no legal international trade of ABFT the price of the species in its key markets is bound to soar. This creates an enormous opportunity for those unscrupulous enough to partake in illegal trade of the species.

In addition, with an international trading ban, chances are that pirate fisheries would sell their ABFT into canneries, at a fraction of the price available in Japan. This would directly affect the amount they have to catch and sell to survive, putting additional pressure on the stock.

## **4. What about Tuna farming?**

The farming industry, currently operating in Croatia, Spain, Malta, Italy, Portugal, Greece, Turkey, Tunisia, Morocco, Libya and Cyprus should be given consideration in the debate on

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5. Costello, C., S. Gaines, and J. Lynham 2008. *Can catch shares prevent fisheries collapse?* *Science* Vol. 321, pp. 1678-1682.

6. REPORT OF THE STANDING COMMITTEE ON RESEARCH AND STATISTICS (SCRS)(Madrid, Spain, October 5-9, 2009), pg 72.

the ABFT. Great advances have been made in the field of fish farming during the last few years:

#### **4.1 Fish farming reduces the pressure on the Atlantic Bluefin Tuna stock.**

Bluefin Tuna caught for farming in the Mediterranean and Adriatic accounts for over 50% of all quotas. Individual farms grow the fish as much as ten times before harvesting. The farms activities hence mean low-intensity on the stock while giving a high output of ABFT.

#### **4.2 Food Conversion Ratio has sharply declined**

Research funded by individual companies, governments and the EU have produced significant results in lowering the Food Conversion Ratio (FCR). Research by the Institute of Oceanography in Split, Croatia show that fish in captivity both have a lower mortality ratio and grow faster than fish in nature.<sup>7</sup>

### **5. An Appendix I listing of ABFT is largely driven by sentiment, not reason**

The key arguments of the Monaco proposal center around the state of the ABFT spawning stock being smaller than 15% of the historical high point of the stock size. According to the SCRS report of the Madrid session in the fall of 2009<sup>8</sup> two major factors in the equation remain highly uncertain: The historical Spawning Stock Biomass (SSBmax) and the current SSB (SSB0).

#### **5.1 The state of the ABFT does not support an Appendix I listing**

Nobody can be certain that the Appendix I criteria is met by the state of the ABFT. According to the SCRS report of November 2009, the state of the stock is not known, not what it is now, nor what it ever was.

In a press release from the US Department of the Interior the existing numbers from 1955 and 2007 are used as a basis of their position to support the listing of ABFT.

*“Based on estimated catches, scientists estimated the spawning stock biomass in 2007 to be 78,724 metric tons. This contrasts with the biomass peak of 1955, at 305,136 metric tons. The decline over the 50-year historical period ranging from 1955 to 2007 is estimated at 74.2 percent, the bulk of which (60.9 percent) took place during the last 10 years.”<sup>9</sup>*

The key argument for the drastic measure of banning all international trade of goods from a certain plant or animal species is that the species is threatened with extinction. To be more specific, the spawning stock of the species must be down to less than 15% of its historical

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7. Katavic et al. Growth indices of small northern bluefin tuna (*Thunnus thynnus*, L.) in growth-out rearing cages.

8. REPORT OF THE STANDING COMMITTEE ON RESEARCH AND STATISTICS (SCRS)(Madrid, Spain, October 5-9, 2009), pg 73.

9. Strickland Announces Continued United States Support for International Proposal to Protect Bluefin Tuna - [http://www.nmfs.noaa.gov/sfa/hms/newslist/2010/03-03-10\\_CITES\\_Bluefin\\_Press\\_Release.pdf](http://www.nmfs.noaa.gov/sfa/hms/newslist/2010/03-03-10_CITES_Bluefin_Press_Release.pdf)

level. According to the US argumentation for their vote at CITES CoP15 the stock is now over 24% of its historical (1955) level.

## **5.2 SCRS reports signs of higher abundance of small ABFT in the Mediterranean**

*“Qualitative information from eastern fisheries since 2007 together with the preliminary results of the aerial surveys in 2009 give consistent indications of higher abundance or higher concentration of small bluefin tuna in the northwestern Mediterranean. This could reflect positive outcomes from increase minimum size regulation implemented under [Rec. 06-05] and/or recent recruitment success.”<sup>10</sup>*

## **5.3 FAO’s advisory panel of independent experts could not reach consensus on listing ABFT on Appendix I**

They concluded that there was only a 23% chance of the 2009 Spawning Stock Biomass (SSB) being less than 15% of the maximum spawning stock. That means that there is a 77% chance of the stock not meeting the main requirement of a CITES Appendix I listing.

## **5.4 Existing information on historical Catch Per Unit effort in the Mediterranean has not yet been evaluated**

Data on the Catch Per Unit Effort (CPUE) in the Adriatic and Mediterranean has been gathered by fisheries and analyzed by scientists, but not yet taken into account by SCRS. The data shows greater abundance of ABFT in the areas.

## **5.5 Misinformation, disinformation and lies**

The global media has systematically been fed with information easily written off as inaccurate or at the worst - lies. The hysteria stirred up by environmental NGOs has risen to the extent where individual restaurateurs in the UK have pulled all tuna off their menus.

The ABFT industry has been portrayed as highly lucrative by the international media, while both fishermen and farms all over the Mediterranean are going out of business due to historically low prices.

The myth that each tuna is sold for over \$100,000 has even been included in press releases from some of the most respected organisations on the planet while the truth is that only the single very first tuna sold in each decade, at the new years auction, is sold at a 50 - 100 times higher price than the average price of \$10 - \$15 per kg.

Environmental NGO's such as PEW, Greenpeace and WWF have been reprimanded by ICCAT over their statements in the media.<sup>11</sup>

No hard scientific evidence supports the notion that the species is becoming extinct. Those fishing and farming the species should be given the opportunity to grow the

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*10. REPORT OF THE STANDING COMMITTEE ON RESEARCH AND STATISTICS (SCRS)(Madrid, Spain, October 5-9, 2009), pg 72.*

11. [http://www.iccat.int/Documents/Other/668-10\\_ENG.PDF](http://www.iccat.int/Documents/Other/668-10_ENG.PDF)

stock via sustainable utilization based on the long term interest of the industry itself and that of the world as a whole.

## **Conclusion**

Atlantis Group urges nations attending the CITES CoP15 in Qatar to say no to the dangerous experiment of listing a commercial species as an endangered one. The listing of a commercial fished species on on CITES Appendices is a short-sighted attempt at a "quick fix" to a complex problem. Moreover this "quick fix" will open up a Pandora's box in all management issues of fisheries the world over.

This problem is best dealt with by those institutions and organisations on the front already doing good work in solving it. RFMO's that have taken as bold steps as ICCAT in the last couple of years are hard to find. We therefore ask voting nations to seriously consider the message being sent out to other RFMO's by listing Atlantic Bluefin Tuna on Appendix I or under any other CITES Appendix.