



25 March 2013

Tamara Stark  
Head of Oceans Campaign  
Greenpeace International  
Ottho Heldringstraat 5, 1066 AZ, Amsterdam, Netherlands

*Open letter in response to Greenpeace inquiry on alleged IUU activity*

Dear Tamara,

The International Seafood Sustainability Foundation (ISSF) shares your concern about all allegations of illegal, unreported and unregulated (IUU) practices in global tuna fisheries. IUU undermines vital conservation and management measures currently in place to protect the world's shared tuna resources, as well as the greater marine ecosystem.

As you know, ISSF works to drive conservation and sustainability in the world's tuna fisheries by bringing together major buyers and processors – encouraging them to commit to buy tuna that meet our continuously-improving best-practice standards for one of the world's largest and most important fisheries. Buying tuna that has been caught legally is a fundamental element of the sustainability requirements for participating companies. ISSF takes accusations linking our participating companies to IUU fishing very seriously. That is why the participants are subject to random, and when necessary cause-related, audits under the direction of the Board. Upon receiving initial reports of possible illegal fishing in the waters off the Liberian coast, ISSF immediately commenced an investigation of the matter. The review has since widened to include the larger issue of alleged fraudulent fishing licenses throughout West Africa and the recent import warning issued by EU authorities concerning tuna from the same region.

Those, as all allegations related to IUU fishing, are being thoroughly reviewed and if the facts determined in our review warrant possible disciplinary action, the ISSF Compliance Committee will be called to act. Our Compliance Committee is composed of scientists, NGO representatives and industry participants, advised by outside legal counsel. The Committee is charged with determining the validity of allegations and to what extent they violate ISSF standards. Our Bylaws provide for imposition of sanctions against industry participants for failure to meet ISSF conservation measures; possible sanctions include expulsion and a mandatory two-year waiting period prior to re-admittance. The Compliance and Discipline Process is available online and includes sanctions for participants who do not meet obligations to cooperate in compliance monitoring. You can access this information at [ISS-Foundation.org/compliance](http://ISS-Foundation.org/compliance).



In order to begin weeding out IUU tuna fishing, ISSF has worked with industry to make permanent and unique vessel identifiers – such as IMO numbers – a standard practice. We have also urged all participants to buy tuna only from vessels on RFMO authorized vessel records and only those vessels that are flagged to a state that is a part of the RFMO process. Companies must also refrain from transactions with vessels on any RFMO IUU list, while maintaining a credible traceability scheme that includes a recall mechanism for any product later found to have come from an IUU source.

Having the world's vast majority of tuna buyers adhere to these standards lays the groundwork for implementing even greater measures of monitoring, control and surveillance. But these conservation measures are only the beginning. As you know, our ProActive Vessel Register, which includes third-party verification of compliance, provides an opportunity for vessel owners to demonstrate to their buyers, retailers, NGOs and the public all the best practices that they are currently adhering to, as well as those that they are working towards meeting in the future.

As ISSF continues to work proactively with industry to implement best practices in all the oceans where tunas are caught, we will also continue to reach out to RFMOs and member governments to strengthen the capacity for effective governance, enforcement and compliance, especially on the part of coastal states. ISSF strongly supports transparency as a way to ensure that conservation and management measures are designed according to the best available science and are implemented consistently. Therefore, ISSF will continue to advocate for stronger RFMOs, including their compliance mechanisms.

IUU fishing detracts from the continuous progress being made by governments and industry to improve practices around the world and we must work together to eliminate it. If you have any specific information regarding the conduct of our industry partners or the vessels that they may be buying from, we hope that you will share that information with us immediately.

Best Regards,

A handwritten signature in black ink, appearing to read 'Susan Jackson', is positioned above the typed name.

Susan Jackson  
President  
International Seafood Sustainability Foundation