



To: Rupert Howes, CEO, Marine Stewardship Council  
 Amanda Park, Moody Marine, Ltd.

April 11<sup>th</sup>, 2011

The undersigned individuals and organizations oppose granting the Marine Stewardship Council (MSC) sustainable fisheries certification to the Canadian North West Atlantic Longline Fishery for Swordfish. Certifying this fishery *compromises the credibility of the MSC* and the sustainable seafood movement as a whole. Despite being given the label ‘sustainable’, this fishery will continue to harm threatened species and catch tens of thousands more animals as bycatch than its target fish. The MSC process has mandated *no changes in fishing practice to reduce bycatch*. Instead, the certificate rewards the status quo in a fishery that should fail the MSC criteria.

**This will be the first surface longline fleet in the world to receive MSC certification. Globally, this gear type is associated with excessive mortality of sea turtles, sea birds and sharks in our oceans. Given that this Canadian fishery has exceptionally high bycatch of these species and does not have even the minimal international best practices in place, this precedent-setting certification is deeply concerning.**

We have carefully considered the assessment score released on March 11<sup>th</sup> 2011 by the certifying company Moody Marine Ltd. We do not agree that their scoring pertaining to 1) endangered, threatened, or protected (ETP) species or 2) bycatch species is justified, for the following reasons:

**1. Endangered, Threatened, or Protected (ETP) species**

**Sensitive Species caught in Atl. Can Pelagic Longline Fishery for Swordfish**

Species	Estimated annual bycatch; number of animals*	Estimated mortality	IUCN Status <sup>a</sup>	COSEWIC Status <sup>b</sup>	‘MSC recognized’ status
Sharks	100 000	35 000			
Porbeagle			Endangered (NW Atl.)	Endangered	
Shortfin Mako			Vulnerable	Threatened	
Blue			Near threatened	Special concern	
Loggerhead turtle	1200	200 – 500	Endangered	Endangered	CITES <sup>c</sup>
Leatherback turtle	170	Unknown	Critically endangered	Endangered	SARA <sup>d</sup>

\* Estimates from fishery observer coverage and peer reviewed documents available at [www.friendsofthector.org](http://www.friendsofthector.org); <sup>a</sup> International Union for the Conservation of Nature; <sup>b</sup> Committee on the Status of Endangered Wildlife in Canada – this body recommends which species should be listed under Canada’s Species at Risk Act; <sup>c</sup> Convention of International Trade in Endangered Animals; <sup>d</sup> Species at Risk Act (Canada)

To define 'ETP species' the MSC does not recognize listing by COSEWIC, Canada's government science advisory body for species at risk, or the IUCN ETP status reports. Shark species are not assessed under MSC's ETP criteria. Unfortunately, even for the endangered sea turtle species scored under the ETP criteria, the assessment falls short.

The MSC's minimum passing grade requires that *"the fishery does not pose a risk of serious or irreversible harm to ETP species and does not hinder recovery of ETP species."*

This fishery has no enforceable management measures in place to minimize catch of sea turtles:

- no bycatch limits
- no bait or soak time restrictions
- no spatial/temporal closures
- insufficient hook restrictions (16/0 circle hooks do not reduce the loggerhead catch rate)
- only 5%, biased observer coverage to monitor numbers, condition, and handling of turtles

**The certification scoring does not mandate any of the above be implemented.**

COSEWIC states that "the primary known threat to Loggerhead Sea Turtles in Canadian waters is bycatch in the pelagic longline fleet." One of the official peer reviewers of the MSC report is clearly concerned about that the precedent this certification sets for this species, stating "other pelagic longline fisheries under ICCAT's auspices are applying for MSC certification" and by failing to consider cumulative impacts, *"the MSC may find itself presiding over further decline of the North Atlantic loggerhead in the name of sustainability."*

**This certification scoring requires no actions by the fishery that will reduce its catch of these ETP species, even though it is clearly posing 'serious harm' to them.**

## **2. Bycatch and retained species**

The bycatch in this fishery is mainly sharks. For a catch of approximately 20 000 swordfish each year, roughly 100 000 sharks are caught. Very few are kept, and an estimated 35 000 die.

The MSC minimum passing guidelines for bycatch and retained species require that measures are in place to ensure that catches of these species *"are highly likely to be within biologically based limits, or to ensure the fishery does not hinder their recovery and rebuilding."*

This fishery has:

- No limits on catch of blue shark
- Non-restrictive guidelines for short-fin mako shark based on catch history, not science
- Non-restrictive guidelines for porbeagle shark that do not account for discards
- No reporting of discards for sharks
- No spatial or temporal closures for sharks
- No gear modification in place to limit shark catch
- Insufficient, spatially biased observer coverage

**The MSC certification scoring requires no conditions on any shark species, and states that this staggering 5 to 1 ratio of sharks to swordfish catch is 'sustainable' according to its criteria.**

It is our firm and informed view that this fishery fails to meet the MSC sustainability standard. We ask that the Marine Stewardship Council and the certifying company, Moody Marine Ltd., either correct the above shortcomings or withdraw their recommendation to certify this fishery.

We look forward to your response at [info@friendsofhector.org](mailto:info@friendsofhector.org)

Signed,

Ecology Action Centre  
Halifax, NS, Canada

Oceana  
Washington, DC, U.S.A.

Sierra Club Canada,  
Ottawa, ON, Canada

David Suzuki Foundation  
Vancouver, BC, Canada

Sea Turtle Conservancy  
Ellicott City, MD, U.S.A.

Project AWARE Foundation  
Rancho Santa Margarita, CA, U.S.A.

Greenpeace Canada  
Vancouver, BC, Canada

Shark Advocates International  
Washington, DC, U.S.A.

Shark Tsunami UK  
United Kingdom

Turtle Island Restoration Network  
Marin County, CA, U.S.A.

PRETOMA  
San José, Costa Rica

Center for Biological Diversity  
San Francisco, CA, U.S.A.

Sea First Foundation  
Duffel, Belgium

The Green Connection  
Aquarium & Science Discovery  
Kota Kinabalu, Sabah, Malaysia

Greenpeace International  
Amsterdam, Netherlands

Greenpeace USA  
San Francisco, CA, U.S.A.

Living Oceans Society  
Vancouver, BC, Canada

Shark Research Institute  
Princeton, NJ, U.S.A

Canadian Shark Conservation  
Society  
Saint John, NB, Canada

Canadian Parks and Wilderness  
Society, Nova Scotia Chapter  
Halifax, NS, Canada

Alliance for Tompotika  
Conservation  
Vashon, USA & Sulawesi, Indonesia

Shark Protect  
Millbrook, NY, U.S.A &  
Rinkerode, Germany

Shark Savers  
New York, NY, U.S.A

Sierra Club USA  
San Francisco, CA, U.S.A

Humane Society USA  
Humane Society International  
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Thailand Dive and Sail  
Liveaboard diving, Thailand

Shark Foundation  
Zurich, Switzerland

Gumbo Limbo Nature Centre  
Boca Raton, Florida, U.S.A

Pacific Environment  
San Francisco, CA, U.S.A

For the Fishes  
Hawaii, U.S.A

Sea Turtles Forever  
Seaside, OR, U.S.A

Support our Sharks  
Perth, Australia

The Global Shark Initiative  
Duffel, Belgium

\*Add your organization to this letter.  
Contact Shannon Arnold [info@friendsofhector.org](mailto:info@friendsofhector.org)