



PREFERENTIAL AND FREE TRADE AGREEMENTS

PNG signs Interim Economic Partnership Agreement, Spanish Industry attempted to scupper global sourcing rules of origin

PNG signed an Interim Economic Partnership Agreement (IEPA) with the EU on 30 July.² This move ensures PNGs duty free access to the EU market, including for fisheries products such as canned tuna and tuna loins. Fiji was the only other PIC to initial the IEPA in November 2007 and it looks set to formally sign the IEPA at a later stage. Between them, Fiji and PNG represent 83 percent of total PIC-EU trade.³

Importantly, the final text of the IEPA assures PNG of global sourcing rules of origin (RoO) for a range of fish products. (See January's issue of *FFA Fisheries Trade News* for details.⁴) Global sourcing RoO are a concession that allows PNG to source fish from *any* vessel – regardless of vessel ownership, flag or registration – as long as it meets EU sanitary and phyto-sanitary (SPS) conditions and the new EU IUU Regulation from 1 January 2010. This concession appears to have directly contributed to new investment in enhanced tuna processing capacity in PNG.⁵ This was recognised by EU Trade Commissioner Catherine Ashton on the signing of the IEPA, who stated that: 'We have already seen how the initialling of the agreement has delivered results, with new investment flowing into the fisheries industry, supporting development in Papua New Guinea and creating jobs.'⁶

In July 2009, the Inter-Professional Tuna Organisation (Interatun), which represents the collective lobbying power of Spanish tuna processing and purse seine associations, attempted to block the formal implementation of global sourcing RoO in the Pacific's IEPA.⁷ In a widely distributed press release, Interatun called on the EU Agriculture and Fisheries Council to not approve these RoO, instead asking for a study to be conducted into impacts on the EU tuna fishing and processing industry,⁸ which is widely recognised as being directly protected by status quo RoO. Interatun argued that PNG already has access to 200,000mt of tuna caught by domestically-flagged boats and thus has no need for additional flexibility. Along the same lines, it went on to state that, as PNG's export of canned tuna is already significant at around 16,500mt, it had no need for expansion.

There are several flaws in Interatun's argument. PNG-flagged purse seine vessels are not normally owned by domestic capital, thereby disqualifying this source of supply unless caught in PNGs 12-mile zone or archipelagic waters. In fact, the vessel ownership requirement in EU fisheries RoO has been the primary source of controversy in ACP-EU discussions on the matter since the late 1970s. This is because of the general lack of 'national' capital in ACP states and its specific limit to investment in fleet development. On the threat to EU processors, at only 2 percent of total canned tuna imports in 2008 PNG was far from

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a dominant player. Moreover, maintaining and expanding the export of tuna products was a central reason for PNG initialising the IEPA, and global sourcing RoO were one of the very few real concessions won by the region. Interatun's request to withdraw them was thus a politically desperate move as, if it had been successful, the eventual signing of the Agreement would have been put into serious doubt.

FISHERIES TRADE AND DEVELOPMENT

Pacific island countries seek to reframe relations with distant water fishing nations and fleets

As reported in the June edition of *Fisheries Trade News*, the PNA countries have developed a secretariat to facilitate their cooperative efforts to increase 'tuna revenue' while ensuring the long-term sustainability of the resource.⁹ In addition to improving data collection and fisheries management efforts the newly formed PNA 'tuna cartel' is exploring how commercial arrangements with foreign fishing firms and major tuna processors might help them achieve their goals.¹⁰ However, at this point it has only been agreed to establish the Secretariat, nothing concrete is in place as yet.

Noting that most of the value is added to tuna in the processing and marketing/branding of the products, the PNA countries are investigating how they can obtain some share of the value generated at this end of the supply chain.¹¹ One approach, in very early stages of exploration, is for PICs to use financial vehicles, such as sovereign or private equity funds, to invest in the profitable downstream nodes of the tuna supply chain. For example, a sovereign PIC fund might become involved in merger and acquisition activities.¹² PICs could also exchange financial participation in value-added portions of the production chain for priority allocation of future fishing licenses or long term quotas. Any of these approaches requires extensive assessment of the risks (both political and economic) involved and the governance structures required to make such projects operational.

Distant water fleets have had varying responses to the news of the tuna cartel. Japan has indicated that it will find ways for its fleet's production strategies to complement the goals of the cartel. Under an 'islandisation' initiative, Japan wants to develop a long term relationship with the PNA countries, perhaps by investing in processing plants in Pacific island countries in exchange for long term fishing rights. Korea has indicated that it too wants to work with the PNA countries to ensure a long-term relationship.¹³ The details of such programmes are yet to be developed, but that Japan and Korea have signaled their willingness to work with the group is an indication of the impact that PIC cooperation stands to have.

On the other hand, regulatory changes implemented by the PNA countries, including the implementation of the vessel day scheme (VDS), have created inconsistencies with the US Treaty. It remains unclear how the VDS will apply to the US fleet since the Treaty is organised around vessel numbers rather than vessel days. In the current VDS text, the US fleet was given unlimited fishing days in accordance

EC recognises global sourcing rules of origin as a contribution to fisheries investment in PNG

The PNA 'tuna cartel' is exploring how it might invest in processing and branding of tuna products to increase economic returns



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with the provisions of the Treaty. If it fished more days than were set aside for it at the beginning of a licensing term, its extra fishing days were to come at the expense of other distant water fleets. However, given the recent growth of the US fleet (from 11 vessels in 2007 to 39 vessels in 2009),¹⁴ PICs have expressed concern that unlimited days for such a large number of vessels will dramatically impact other fishing vessels. Some PICs have gone as far as to indicate that the US Treaty is being abused as a mechanism to bypass the more stringent VDS.¹⁵ The US fleet wants the legal terms of the agreement to be honoured (in other words, it wants unlimited fishing days), but has indicated that it wants to cooperate with PICs so that the US Treaty continues to work for all parties.¹⁶ Both the US fleet and PICs indicate that these details are yet to be worked out.¹⁷

Scientists sign consensus statement on threats to the Pacific Ocean

After conducting a scientific literature review of coastal and ocean threats, impacts and solutions, the Center for Ocean Solutions has released a Pacific Ocean Scientific Consensus Statement.¹⁸ This was done in collaboration with the International Union for the Conservation of Nature (IUCN) Global Marine Programme and the Ocean Conservancy.

The report presents a synthesis of scientific research on the Pacific Ocean, and identifies pollution, overfishing, habitat destruction and climate change as the four most serious threats to health and productivity throughout the Pacific Ocean. Invasive species and the challenges of managing multiple stresses simultaneously (such as habitat destruction and climate change) are also priority concerns.¹⁹ The report outlines the natural, physical and social dimensions of these threats, highlighting the common negative implications for Pacific Rim and Pacific island countries alike.

In the WCPO, Micronesian countries face all four broad threats identified in the report: overfishing and exploitation, climate change, habitat destruction and pollution. Commercial fishing is highlighted as having the potential to cause ecosystem-wide shifts, reduce fish stocks and food supply. Climate-induced sea surface temperature rise and sea level rise pose dire threats to Micronesia. Both stand to destroy marine ecosystems and jeopardize human economies and livelihoods. In addition to overfishing and climate change, several Melanesian countries face the severe threat of land-based sedimentation from intense rainfalls and wave action. Land-based sedimentation can damage marine ecosystems, with particularly dire consequences for coral reef ecosystems. Both Micronesian and Melanesian countries are applauded for their participation in regional environmental programs to address these threats,²⁰ but their success in addressing these issues, particularly global climate change, will require participation and action from countries around the world.

In summarising the themes in the literature review, the report presents an overview of issues familiar in fisheries management debates in the WCPO region. It highlights the importance of: taking an ecosystem

Japan and Korea have signaled their willingness to work with the PNA tuna cartel; inconsistencies remain with the application of the US Treaty

Pollution, overfishing, habitat destruction and climate change are threats to ocean health generally and in Micronesia and Melanesia



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approach to management (one that recognises humans as key components of the ecosystem); strengthening regional governance and monitoring and enforcement efforts; creating more marine protected areas; and, involving communities in conservation efforts.

Upon completion, more than 400 scientists from 30 countries signed the Pacific Ocean Scientific Consensus Statement, presenting the first scientific consensus on threats facing the Pacific Ocean.²¹ The creators of the document intend for it to provide the scientific basis for leaders and decision makers to collectively call for action (particularly regional action) in addressing the most pressing threats in the Pacific.

FISHERIES TRADE-RELATED REGULATION

International Seafood Sustainability Foundation (ISSF) takes action on traceability, tuna stocks and bycatch

As first reported in the March-April edition of *Fisheries Trade News*, the ISSF is a collaboration between scientists, environmental NGOs and major players in the tuna industry designed to strengthen sustainability in the tuna sector.²² Formed in January 2009, the group seeks to draw on sound science, and the market power of major retailers to generate environmental improvements in the tuna sector. In recent months, the group has taken several major actions.²³

First, ISSF announced that from January 2010, its members will 'credibly trace tuna products from capture to plate'.²⁴ ISSF seeks to have traceability functioning in all Regional Fisheries Management Organizations (RFMOs) to supplement existing catch data. These data supplements will enable scientists to make better informed decisions on stocks and quotas.²⁵ All members will keep detailed records documenting the name and flag of catching and transshipping vessels, fish species, ocean of capture (and corresponding RFMO), fishing trip dates, gear employed and date the company takes ownership of the fish.²⁶ It is unclear if that information will be available to the public since the ISSF Resolution demands only full documentation of the tuna products' origins, and does not mention information disclosure.²⁷ ISSF hopes that improving traceability will eliminate data gaps that foil management measures. The traceability resolution mandates that participating companies take product off shop shelves if it is discovered to come from an illegal source.²⁸ Since processing companies would have to swallow the costs of these lost products, they have more incentive to do the best they can to avoid purchasing from illegal sources; which in turn, reduces incentives for illegal fishing.

Second, ISSF is compiling and analysing available data on tuna stocks, publishing summaries and recommending actions to tuna RFMOs and its own members. ISSF reports that 14 of 21 assessed tuna stocks are either overfished or suffering some effects of overfishing and has developed recommendations for RFMOs to control, and eventually reverse these trends.²⁹ Based on its assessments, ISSF red-listed

The Pacific Oceans Scientific Consensus Statement is intended to provide the scientific basis for leaders to address the most pressing threats in the Pacific

ISSF members will trace tuna products from capture to plate, in an effort to supplement existing catch data



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Eastern Pacific Ocean bigeye tuna. The red-listing defines the stock as overfished and identifies that there are no conservation measures in place to ensure its sustainability. In fact, Eastern Pacific bigeye and yellowfin have been fished without conservation measures in place since 2007. As a result of the red-listing, ISSF board members passed a conservation resolution urging the Inter-American Tropical Tuna Commission (IATTC) to follow the advice of its scientific staff³⁰ and for companies to refrain from conducting bigeye transactions in the eastern Pacific beginning in September 2009, if science-based conservation measures were not put in place by that time.³¹ Following IATTC's Resolution C-09-01, which includes a purse seine fishing closure that will reduce fishing effort by roughly 20 percent, ISSF lifted its 'red-list' status, despite that the measures fall short of the 30 percent capacity reduction recommended by the IATTC scientific body.³² It is not clear how much influence the 'red-list' had on IATTC's decision to strengthen bigeye management measures.

Third, ISSF is tackling the issue of bycatch in tuna fisheries. It has produced a white paper that summarises current efforts to gather bycatch data. In this paper, ISSF makes a proposal for global coordination of bycatch and discard mitigation research.³³ To advance its proposal, at the second joint tuna RFMO meeting in San Sebastian, Spain in July 2009, ISSF called for a coordinated, global study examining bycatch. The objective is to improve on best-practices around bycatch by streamlining the various research and policy efforts.³⁴ ISSF has offered to host a future workshop for leading scientists and tuna fisheries experts to detail the direction of a global bycatch research project, help set priorities for future research (including dedicating research vessels from which gear and technology experiments could be conducted), develop and implement a global fundraising strategy, and involve a fleet of willing fishing vessels to identify the most promising bycatch reduction technologies.³⁵

Through these efforts, ISSF is emerging as an important actor in the fisheries management nexus. It is drawing attention to important sustainability issues and urging institutions to improve on existing trends and generate political will for improvements. Since its members are powerful industry actors, ISSF's voice matters. However, it remains to be seen if ISSF political action alone will provide the impetus for change in management bodies, and if not, if ISSF members will be willing to use their considerable market power to force change through such tactics as boycotts.

TUNA MARKETS

Greenpeace rates fisheries eco-label schemes

Eco-labels have emerged as an important part of the fisheries regulatory landscape. For example, several supermarkets have committed to purchasing only those seafood products certified by various eco-label regimes.³⁶ French seafood companies and retailers have announced that they will aim to manufacture at least 20 percent of all product under FAO sustainability criteria by

ISSF is promoting global coordination of bycatch and discard mitigation research

Greenpeace analysed leading fisheries eco-label schemes and found that the schemes do not credibly identify sustainable seafood



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2015.³⁷ In turn, fisheries around the globe have committed to the certification process, not only to secure their position as suppliers to retailers mandating certification, but also in hopes of collecting price premiums that eco-labels can deliver.

The tuna industry is no exception. In May 2009, two tuna fisheries have been certified by the Marine Stewardship Council (MSC) and the Friend of the Sea eco-label schemes, and eight more were in various phases of certification processes.³⁸ Most recently, Friend of the Sea certified a 'multi-hook shortline' tuna fishery in Sri Lanka in July 2009,³⁹ and a purse seine fishery in PNG in August 2009. Notably, the PNG case was the first purse seine fishery to ever receive an eco-label certification.⁴⁰

Despite rapid growth in the use of eco-labels, dissatisfaction with both MSC and Friend of the Sea schemes is emerging. In June 2009, Greenpeace released two reports evaluating MSC and Friend of the Sea schemes, and concluded that 'no credible certification program from sustainable wild-caught or farmed seafood currently exists.'⁴¹ The reports highlighted that MSC does not include a socio-economic criteria, its requirements are not stringent and fail to address critical issues such as the use of destructive catching methods. Furthermore Greenpeace indicates that MSC certification methodologies are sufficiently weak to allow for inconsistencies.⁴² Friend of the Sea received less criticism, but there was still not enough praise to deem the scheme fully credible. Specific shortcomings include a lack of professionalism, transparency, poor stakeholder involvement, weak environmental standards and failure to use guidance documents to develop criteria.⁴³

Compounding doubt over the credibility of eco-label schemes, in July 2009 the British supermarket chain Waitrose refused to stock MSC certified New Zealand hoki because environmentally harmful bottom trawling is used in the fishery.⁴⁴ In short, Waitrose indicated that MSC certification was not a guarantee of sustainability. If other retail markets take similar action, the certifying bodies will have no choice but to strengthen their criteria, or lose their markets.

Developments among Spanish tuna firms

Spain is an important country for both tuna fishing and processing activities and has seen an array of developments in the sector.

Spanish fishing and processing giant Calvo Group, has made two new marketing moves. First, the firm's Brazil-based Gomes da Costa certified its skipjack pole and line fishery as sustainable in line with the Friend of the Sea eco-label programme.⁴⁵ Second, Calvo is entering the chilled market with a new range of tuna burgers and sausages designed for healthy convenience for families.⁴⁶ Such moves contribute to confidence in the firm's health, despite that the central bank of Spain took direct control of Caja Castilla la Mancha, which owned 5.5 percent of Calvo.⁴⁷

Expansion seems to be on the minds of other Spanish firms as well. Albacora group, the vertically integrated tuna fishing company,

A PNG tuna purse seine fishery was the first in the world to receive an eco-label for this gear type

Waitrose, the large British supermarket chain, announced that it will not stock MSC certified hoki

To combat a slump in traditional seafood consumption, Spanish producers are promoting their products in a new campaign



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predicts that its sales will increase by USD14 million in 2009 compared to 2008, bringing total sales for 2009 to USD240 million. Growth is predicted to arise from Albacora's Salica Alimentos Congelados division, which processes and markets value added frozen tuna products.⁴⁸ Likewise, Spanish seafood firm Jealsa Rianxeira, S.A. will begin to supply its new value-added product, tuna taquito snacks, to Wal-Mart. The product will be available at all of the retail giant's outlets in the United States.⁴⁹

Despite growth in these areas, there has been a slump in consumption of traditional seafood species among Spanish consumers, largely thought to be driven by a shift towards low cost farmed imports to the country. To combat the trend, the Spanish Fisheries Confederation, an organisation representing Spain's commercial fishing interests, Spain's Association of Market Traders and the Regulation and Organisation Fund for the Fish and Marine Cultures Market, will launch a joint campaign to inform and educate consumers about the benefits of locally caught fish. Campaign strategies include disseminating information in fish markets and collaborating with chefs and restaurants, as well as pushing for government to strengthen labeling requirements so that consumers can make informed decisions.⁵⁰

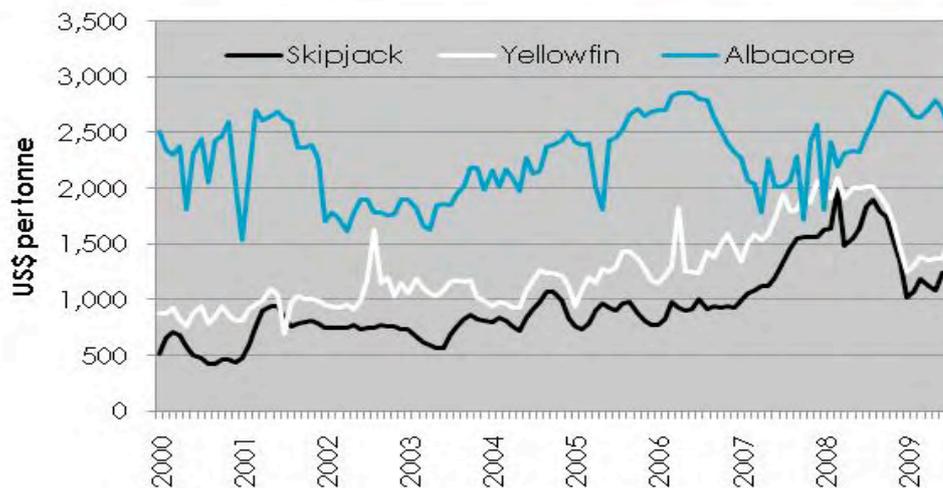
The Spanish industry is still clouded by controversy over illegal, unregulated and unreported (IUU) fishing and government support for illegal fishing practices. In the spring of 2009, Greenpeace and Oceana claimed to have identified alleged IUU fishing vessels, and accused the Spanish government of either supporting the vessels through subsidy programmes, or failing to take steps to decommission or scrap vessels identified as illegal.⁵¹ These environmental organisations continue to monitor such vessels and call for regulatory and commercial action against them.

Expansion in the Spanish seafood market is overshadowed by persistent accusations of illegal fishing activities

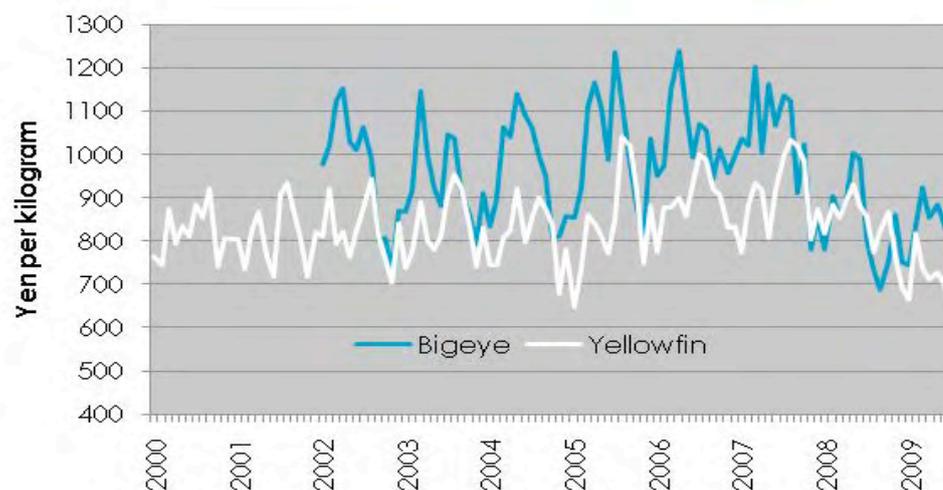


TUNA PRICE TRENDS

Canning-grade prices: Bangkok (SKJ & YFT) and Pago Pago (ALB) to July 2009⁵²

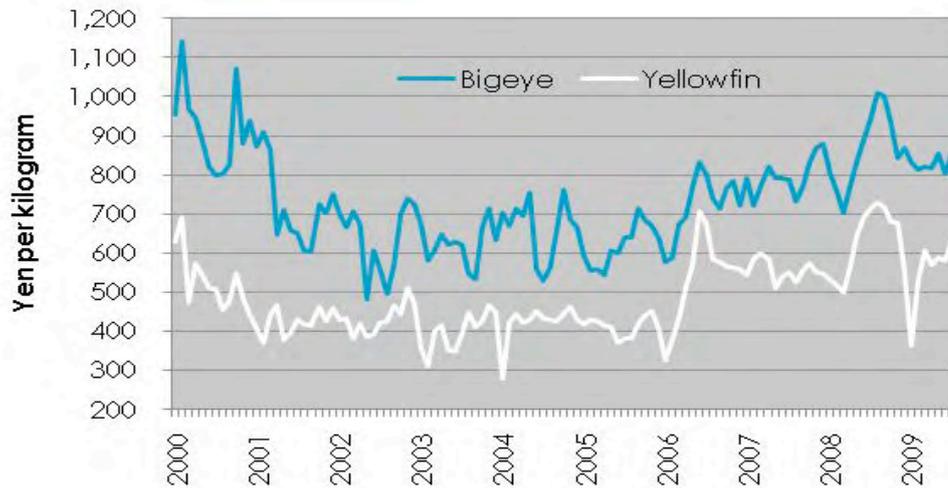


Japan frozen sashimi prices (ex-vessel, Japanese ports) to July 2009⁵³

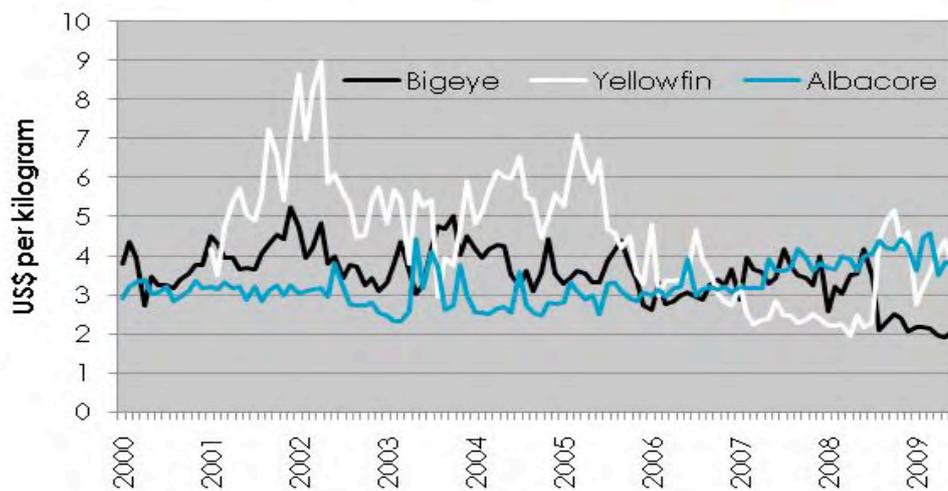




Japan fresh sashimi prices (origin Oceania) to July 2009⁵⁴

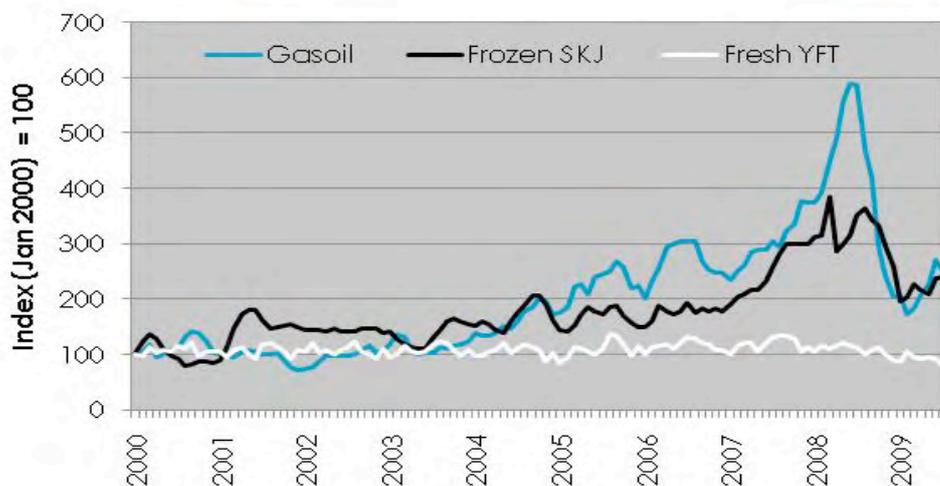


US imported fresh sashimi prices to June 2009⁵⁵





Gasoil, canning-grade SKJ and sashimi YFT price index to July 2009⁵⁶



Coming in the next issue (September 2009, Vol. 2: Issue 9)

- Update on EU IUU regulation: implications for developing country exports
- Signs of success in India's efforts to expand tuna exports



¹ Prepared for the FFA Fisheries Development Division by Liam Campling, Consultant Fisheries Trade Analyst, FFA, and Elizabeth Havice, Colorado College. Desktop publishing by Antony Price. The authors would like to thank Len Rodwell for his input on an earlier draft of this briefing. The contents of this briefing (including all analysis and opinions) are the responsibility of the authors and do not necessarily reflect the positions or thinking of the FFA Secretariat or its Members.

² 'EU and Papua New Guinea sign agreement', *Swedish Presidency of the EU*, 30 July 2009. Available at: http://www.se2009.eu/en/meetings_news/2009/7/30/eu_and_papua_new_guinea_sign_agreement

³ 'The EU and Papua New Guinea signed the interim Economic Partnership Agreement', *EPA Flash News*, DG Trade, European Commission, 30 July 2009. See also, 'EU, Papua New Guinea Ink Trade Pact', *Bridges Weekly Trade News Digest*, 13(29), 5 August 2009. Available at: <http://www.ictsd.org>

⁴ 'Fiji and PNG agree to global sourcing rules of origin in Interim Economic Partnership Agreement', *FFA Fisheries Trade News*, 2 (1), January 2009. Available at: http://www.ffa.int/trade_news

⁵ See: 'Onshore processing investments in PICs: Assessing the net benefits?', *FFA Fisheries Trade News*, 2(6), June 2009; and 'New tuna processing facility in Lae, PNG', *FFA Fisheries Trade News*, 2(2), February 2009. Both available at: http://www.ffa.int/trade_news

⁶ 'The EU and Papua New Guinea signed the interim Economic Partnership Agreement', *EPA Flash News*, DG Trade, European Commission, 30 July 2009.

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⁸ Analia Murias, 'INTERATUN rejects EU-Papua New Guinea accord', *FIS*, 10 July 2009. Available at: <http://www.fis.com> Also available at: <http://www.bilaterals.org>

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¹⁰ Samisoni Pareti, 'Cover Story: A tuna cartel? Pacific states borrow OPEC idea to fix tuna price', *Islands Business*, 8 June 2009. Available at: <http://www.islandsbusiness.com>

¹¹ Kate McPherson, 'Pacific wants a bigger tuna slice', *Australia Network News*, 10 August 2009. Available at: <http://www.australianetworknews.com>

¹² Robert Gillet and Gert van Santen, 'Optimizing fisheries benefits in the Pacific islands', *World Bank Discussion Papers: Sustainable Development - East Asia and Pacific Region*. May 2008. Available at: <http://www.worldbank.org/eaprural>

¹³ Samisoni Pareti (2009).

¹⁴ 'Development in the US purse seine fleet and the US Treaty', *FFA Fisheries Trade News*, 2(3&4), March and April 2009. Available at: http://www.ffa.int/trade_news

¹⁵ Samisoni Pareti (2009).

¹⁶ Pers. Communication, US Industry official, May 2009.

¹⁷ 'Outcomes from FFA's US and Indonesia talks' *FFA Media Release*, 24 March 2009.



¹⁸ For an overview of the Pacific Ocean Initiative and related documents and resources, see: http://www.centerforoceansolutions.org/initiatives_poi.html

¹⁹ 'Pacific Ocean synthesis: Scientific literature review of coastal and ocean threats, impacts and solutions', *Center for Ocean Solutions*, May 2009. Available at: <http://www.centerforoceansolutions.org/PacificSynthesis.pdf>

²⁰ Specifically, Micronesian countries have been leaders in the global climate change dialogue by working within the United Nations Framework Convention on Climate Change and locally implementing a Climate Change Assistance Programme. Micronesia has also tested the Secretariat of the Pacific Regional Environmental Programme, as have countries in Melanesia. There are Marine Protected Areas in Micronesia and in Melanesia, including Kiribati's vast Phoenix Island Protected Area.

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²³ For more on the ISSF, see: 'Tuna industry leaders launch international seafood sustainability foundation', *FFA Fisheries Trade News*, 2(3&4), March and April 2009.

²⁴ The members committed to providing traceability data include: Bolton Alimentari; Bumble Bee Foods LLC / Clover Leaf Seafoods; MW Brands; Princes Ltd.; Sea Value Co., Ltd.; StarKist Co.; Thai Union Manufacturing Co. Ltd / Chicken of the Sea; and Tri Marine International.

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²⁶ IntraFish Media (2009). ISSF approves tougher tuna record-keeping rules. 12 August. Available at: <http://www.intrafish.no>

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²⁹ Ben DiPietro, 'Two-thirds of world's tuna stocks overfished', *IntraFish Media*, 10 July 2009. Available at: <http://www.intrafish.no>; James Joseph, 'Addressing the issues of fishing capacity in the world tuna fleets', *International Seafood Sustainability Foundation White Paper*, no date. Available at: <http://www.iss-foundation.org/Features/ISSF/News/Details.aspx?itemid=34&navid=264>

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³³ 'Bycatch in the world's tuna fisheries: An overview of the state of measured data, programs and a proposal for a path forward', *International Seafood Sustainability Foundation White Paper*, June 2009. Available at: <http://www.iss-foundation.org/bycatchwhitepaper>

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³⁸ *FFA Fisheries Trade News*, 2(5), May 2009.

³⁹ 'Sri Lankan tuna gets Friend of the Sea nod', *IntraFish Media*, 29 July 2009. Available at: <http://www.intrafish.no>

⁴⁰ 'PNG purse seiners certified Friend of the Sea', *Island Business*, 19 August 2009. Available at: <http://www.islandbusiness.com>

⁴¹ Ben DiPietro, 'Greenpeace report: Eco-labels not credible', *IntraFish Media*, 2 July 2009. Available at: <http://www.intrafish.no>

⁴² 'Assessment of the Marine Stewardship Council (MSC) fisheries certification programme', *Greenpeace Briefing*, June 2009. Available at: <http://www.greenpeace.org>

⁴³ 'Assessment of the Friend of the Sea fisheries and aquaculture certification programme', *Greenpeace Briefing*, June 2009.

⁴⁴ 'UK stores reject NZ hoki', *New Zealand Herald*, 21 July 2009. Available at: <http://www.nzherald.co.nz>

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⁴⁶ Tom Seaman, 'Calvo enters chilled market', *IntraFish Media*, 20 February 2009. Available at: <http://www.intrafish.no>

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⁵⁰ Ewen Cook, 'Spanish seafood groups push wild', *IntraFish Media*, 18 August 2009. Available at: <http://www.intrafish.no>



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⁵² Customs Department, Thailand. <http://www.customs.go.th/Statistic/StatisticIndex.jsp>

⁵³ FFA database

⁵⁴ Japan Customs. http://www.customs.go.jp/toukei/info/index_e.htm

⁵⁵ US National Marine Fisheries Service. <http://www.st.nmfs.gov/st1/trade/index.html>

⁵⁶ US Energy Information Administration. http://tonto.eia.doe.gov/dnav/pet/pet_pri_spt_s1_m.htm