

## Series on Mauritania # 5

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# Certifying the unsustainable: The Fisheries Improvement Project in Mauritania

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The strategy of transforming seafood industry through voluntary partnerships and market-based incentives is the approach currently favoured by many environmental NGOs and donors. This third article of the series regarding the financierisation and the blue economy covers the case of Mauritania reduction fisheries “Fisheries Improvement Project” and highlights the fundamental flaws with the corporate friendly approach and the urgent need to resist this model becoming normalised.

## Introduction

In January this year, the French multinational company Olvea Group announced it was awarded an “A grade” by the NGO Sustainable Fisheries Partnership (SFP). This was given because of its work on a Fisheries Improvement Project (FIP) in Mauritania’s fish reduction industry. This industry turns small-pelagic fish like sardinella into fishmeal and fishoil.

The FIP, launched in 2017 and designed to transform it into a sustainable fishery, includes various objectives ranging from improving scientific data on small-pelagic species to strengthening compliance with laws by vessels, - a key issue given widespread reports of rule-breaking. Most importantly, the FIP contains ambitions

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<sup>1</sup> “Grade “A” for the Mauritanian FIP supported by OLVEA!”, News, 17 January 2022, Olvea website. Available at: <https://www.olvea-fish-oils.com/2022/01/17/grade-a-for-the-mauritanian-fip-supported-by-olvea/>

to ensure the reduction industry respects human rights and does not harm regional food security. But the reality of the FIP falls short of these ambitions.

The scoring system used by the SFP to grade FIPs covers A to E. That Olvea got the A grade suggests the work for the FIP in Mauritania has been impressive over the past five years. The FIP is also categorised as now reaching ‘stage 4’. This is reserved for fisheries that have shown improvements for sustainability either through gains in fisheries management or measurable improvements of fishing operations. Stage 5, which is the last milestone, involves concrete evidence for improvements in sustainable fishing. The assessment of the SFP describes the FIP is on track to make stage 5 by 2025, if not sooner.

Although the Olvea Group is considered the lead organisation of the FIP in Mauritania, it is just one of 11 companies funding this initiative. Others include: Royal Canin, a global pet food company based in France; the agribusiness giant Cargill that uses fishmeal for fertilisers and feeding intensively reared animals; and Skretting from Norway, one of the world’s leading producers of fish feed for salmon farms. These are not companies operating in Mauritania, but all of them have corporate social responsibility pledges to only buy fish from sustainable fisheries.

Absent from the members of the FIP are the factories owned by Chinese companies, which however account for the largest production in volume of fishmeal. It is also China that appears to be the biggest buyer of Mauritanian fishmeal, which is used predominantly for its booming aquaculture industry, but also for feeding farmed animals. This snub by Chinese firms is awkward for the FIP as they might be viewed as free riders who take advantage of what other companies are doing. Indeed, the FIP’s grade applies to the entire industry, not just the companies who are members of the initiative.

The primary reason why companies are signing up to this FIP is to gain one of the world’s leading ecolabels for products sourced in Mauritania. This might explain why Chinese companies are not involved, as there is not much demand for eco-labelled products in China. Initially the focus has been on the London based Marin Trust<sup>2</sup> eco-label, which specialises in certifying fishmeal products for the aquaculture industry. In 2018 the members of the FIP therefore commissioned an independent pre-assessment of the Mauritanian fishery under the Marin Trust label. As that assessment found, the fishery was not ready to get the full eco-label, but it was eligible to be listed by the Marin Trust as a fishery on its improver programme<sup>3</sup>.

Although the FIP is continuing with their pursuit of the Marin Trust label, members of the FIP have also identified gaining the Marine Stewardship Council (MSC) label as another option. They have therefore paid for an MSC pre-assessment in 2021. That also highlighted that much is needed to be done before the companies stand a chance of getting the full MSC label. But the A-Grade obtained and reaching ‘stage 4’ suggests they are now heading in the right direction.

### SFP’S ROLE GOES BEYOND THE FIP

The US NGO SFP is the driving force behind the FIP in Mauritania. It has encouraged the companies to commit to and fund the FIP, and it provides ongoing technical

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<sup>2</sup> See their website: <https://www.marin-trust.com/>

<sup>3</sup> More info: <https://www.marin-trust.com/mauritania-small-pelagics-fip>

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assistance to them. It also provides the annual scores for the FIP and decides if the FIP has met the criteria for being stage 4 or 5. In fact, it was the SFP that designed the international standards to grade FIPs in the first place.

SFP's partnership with the seafood companies in Mauritania is not limited to the FIP. There are two other prominent initiatives SFP is working on to help these companies improve their sustainability and communicate this to the public.

One of these is establishing a 'Global Roundtable on Marine Ingredients',<sup>4</sup> which includes those companies funding the FIP in Mauritania. Launched in 2021, this Roundtable has its own secretariat that is co-managed by the SFP and the Marine Ingredients Organisation, formally the International Fishmeal and Fishoil Organisation (IFFO)<sup>5</sup>. Roundtables are increasingly used by US NGOs to organise corporate partnerships. The SFP runs several others, including a Roundtable on prawn farming in Asia. Through these roundtables, the SFP has corporate partnerships with some of the world's largest seafood producers and buyers, including McDonalds, Walmart, Nestle, Tesco, Disney and Pescanova.

The roundtable on marine ingredients aims to co-ordinate efforts to increase the production of fishmeal and fishoil from sustainable fisheries, i.e. those with ecolabels. Its ambition is to work on reduction fisheries worldwide, but on its website the only active project is on West Africa. The roundtable is chaired by former Assistant Director and head of Fisheries and Aquaculture of the UN's FAO, Arni Mathiesen.

The second initiative stems from the Target 75 Initiative,<sup>6</sup> which aims to get 75% of globally traded seafood products classified as either sustainable or 'improving'. It was launched in 2017 by the SFP and is now supported by several other US NGOs and ecolabelling companies. In 2019, in recognition of their work in Mauritania, the SFP made the Olvea Group one their 'T75 Champions'<sup>7</sup>. Other T75 champions selected by the SFP include the French company 'Fish is Life', that sells sushi grade salmon and tuna in Europe; 'Union Martin', a Spanish company based in the Canary Islands with 7 industrial trawlers operating in West Africa and PanaPesca, an Italian multinational seafood supplier, selling products like packaged frozen prawns and vacuum-packed octopus.

One of the key outputs of this T75 initiative is a global index showing progress on its objective. The results of this index are important for companies and industry associations lobbying work, used as independent verification that their operations are improving. Currently the index<sup>8</sup> indicates 41% of fisheries are either sustainable or improving, so there's only another 34% to go. The SFP provides reports for specific fishery sectors, and the one for fishmeal and fishoil shows that of the fisheries reviewed only 21% were now unsustainable. The "A grade" in Mauritania has helped push the index up, as now all fishmeal and fishoil produced in Mauritania is classified as improving. This fishery is no longer being counted in the unsustainable category.

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<sup>4</sup> See their website: <https://marineingredientsroundtable.org/>

<sup>5</sup> See their website: <https://www.iffo.com/>

<sup>6</sup> More info: <https://sustainablefish.org/impact-initiatives/target-75/>

<sup>7</sup> "Sustainable Fisheries Partnership - Champion Target 75", News, 19 October 2019, Olvea website. Available at: <https://www.olvea-fish-oils.com/2019/10/19/target-75-champion-sustainable-fisheries-partnership/>

<sup>8</sup> See the Progress of overall Target 75 status at the following address: <https://public.tableau.com/app/profile/ananta.murti/viz/T75OverallCopy/OverallT75Status>

## TOO GOOD TO BE TRUE

The information coming from the SFP and its partners in the seafood industry suggests things are looking up for reduction fisheries in Mauritania. Clearly the SFP recognises the fishery supplying fishmeal and fishoil production in Mauritania is not perfect, but with their help seafood companies are pushing hard to transform the sector so that it is environmentally sustainable and socially responsible. The situation in Mauritania apparently validates the strategy of transforming seafood industry through voluntary partnerships and market-based incentives, which is now the approach favoured by many environmental NGOs and donors.

However, a closer look reveals none of the positive sustainability claims are true. A large amount of evidence shows that this industry is a social and ecological disaster. Meanwhile, the companies that are funding the FIP use fishmeal and fishoil as an input for other industries, like intensive farming and aquaculture, that are themselves environmentally and socially damaging. In fact, the companies sponsoring the FIP in Mauritania, and taking a seat at the roundtable, include several that are guilty of a catalogue of environmental crimes and human rights abuses, with Cargill<sup>9</sup> probably being the worst of the lot. Nothing about this industry seems to equate to it being *environmentally positive*.

The case of Mauritania reduction fisheries FIP highlights the fundamental flaws with the corporate friendly approach taken by the SFP, and the urgent need to resist this model becoming normalised.

## 1. A Recap: The problems with the fish reduction industry

The last decade has seen a reckless boom in investments in the fish reduction industry throughout West Africa that has been unplanned and lacking in transparency. It has not followed widespread consultations or been subject to credible environmental and social impact assessments. Official data suggests total volumes of fishmeal and fishoil produced in West Africa grew from 13,000 tonnes in 2010, to nearly 200,000 last year. Almost all of this is sold to buyers in Asia, Europe and North America.

Although it is expanding in several countries, including The Gambia and Senegal, Mauritania has become the largest hub of fishmeal and fishoil production in the region. Encouraged through subsidies in the form of lower tax obligations, Chinese, European, Turkish and West African companies have heavily invested in fish reduction factories. There were 13 of these factories in 2014. By 2018 this number grew to 25, and another 19 were built and waiting to start operations. Artisanal fisheries organisations have argued that producing fishmeal and oil from fish waste only

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<sup>9</sup> "Cargill: The worst company in the world", Mighty Earth, Report, July 2019. Available at: <http://www.mightyearth.org/wp-content/uploads/Mighty-Earth-Report-Cargill-The-Worst-Company-in-the-World-July-2019.pdf>

would be fine, but this at most would sustain one or two factories, as was the case before 2010.<sup>10</sup>

Originally fishmeal factories in Mauritania were supplied by small-scale fishers from Senegal, mainly from the Saint Louis region, with pirogues chartered by fishmeal plants or intermediaries. But as the industry has grown a new fleet of about 70 Turkish owned seiners, as well as other vessels from China, has replaced them. They are preferred suppliers for the factories because they work at scale and can deliver in bulk. These seiners are licensed to fish in the coastal zone of Mauritania, which has been banned for the fleet of foreign supertrawlers that can only fish further out to sea.

The Mauritanian government has, over the years, tried various strategies to reduce the amount of fish ending up in the factories, including restricting the fishing areas for the Turkish seiners,<sup>11</sup> raising export taxes for fishmeal and fishoil and introducing a cap on production for each factory. The latest policy has been for these seiners to have refrigerated sea water (RSW) compartments on board so they can keep the fish fit for human consumption. But these policies are hard to impose as factories need high volumes of fish to remain profitable. It is unsurprising that rules on fishing and sourcing fish by factories are routinely ignored.

The industry is therefore unsustainable due to its basic structure and overcapacity, meaning without drastically reducing the number of factories, regulations on inputs and production are doomed to failure. Unfortunately, it is a stubborn industry to regulate throughout West Africa. This is partly because it is politically powerful; not only providing revenues for governments, but with persistent allegations politicians have direct investments in some factories.

Because of all this, the sector has been subject to considerable protests and criticisms from other fishing stakeholders, marine scientists<sup>12</sup>, civil society and local, regional<sup>13</sup> and international environmental organisations<sup>14</sup>. It has also been subject to negative assessment by the FAO<sup>15</sup>. These mounting criticisms are not only because the industry directly contributes to declining fish populations at a regional level, but because it poses direct competition for small-scale fisheries and the supply of fish for human consumption in West Africa.<sup>16</sup> This is a critical issue given worsening food insecurity in the region and a declining availability of fish in people's diets. It is

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<sup>10</sup> "Sardinella, staple food of West African coastal communities, in dire straits - How the EU-Mauritania fisheries agreement can be used to improve the management of these overfished species", FAO, CFFA-CAPE website, available at: <https://www.cffacape.org/fishmeal-mauritania>

<sup>11</sup> GOREZ, Béatrice, "Mauritania: A 40-metre seiner authorised to fish on the borders of the Banc d'Arguin", CFFA-CAPE website, 13 September 2021. Available at: <https://www.cffacape.org/publications-blog/mauritania-a-40-metre-seiner-authorized-to-fish-at-the-gates-of-the-banc-darguin>

<sup>12</sup> CORTEN, Ad, "Round sardinella, key for food security in West Africa, is further declining", CFFA-CAPE website, 15 October 2018. Available at: <https://www.cffacape.org/publications-blog/2018/10/15/2018-10-15-round-sardinella-key-for-food-security-in-west-africa-is-further-declining>

<sup>13</sup> "Fishmeal plant: A threat to food and nutritional security?", CAOPA website, 21 April 2021. Available at: <https://caopa.org/en/fishmeal-plant-a-threat-to-food-and-nutritional-security/21/04/2021/news/3254/>

<sup>14</sup> "Until the Seas Run Dry: How industrial aquaculture is plundering the oceans", Changing Markets Foundation, April 2019. Available at: <https://changingmarkets.org/portfolio/fishing-the-feed/#:~:text=The%20evidence%20shows%20that%20grinding,available%20for%20direct%20human%20consumption.>

<sup>15</sup> THIAGO, Djiga et al., "Socio-economic and biological impacts of the fish-based feed industry for Sub-Saharan Africa", FAO Fisheries and Aquaculture Circular No. 1236, NFIAP/C1236. Available at: <https://www.fao.org/3/cb7990en/cb7990en.pdf>

<sup>16</sup> AFDB, "The Future of Marine Fisheries in the African Blue Economy", African Natural Resources Centre, 2022. Available at: <https://www.afdb.org/fr/documents/future-marine-fisheries-african-blue-economy>

ethically wrong that fish are being used for fishoil and fishmeal that could otherwise be used to help feed people.

The fishmeal and fishoil industry claims it only uses what is not fit for people<sup>17</sup> to eat, but that has been proven untrue time and again. The industry also tries to deflect criticisms by claiming it drives economic growth and adds value through employment. But the FAO's research confirms that the net benefits of the industry are negative. The industry provides a limited number of quality jobs, most of which are taken up by foreign employees, while it directly undermines the jobs and livelihoods of thousands of people, including women working in processing and selling fish for human consumption. The reduction industry is therefore not only a threat to marine ecosystems, but it jeopardises the local economy and food security.

To add yet further to the problems, the fish reduction factories cause local air and water pollution, and the entire process of catching, processing and exporting fishmeal and fishoil generates high levels of carbon emissions.

It is in this context that SFP's partnership with companies at the heart of this problematic industry needs to be understood. Is it really an industry that can improve itself?

## 2. Understanding the FIP industry

US NGOs came up with the idea of FIPs to help fishing and seafood companies take steps towards gaining eco-labels, primarily the Marine Stewardship Council, but also others such as the Marin Trust label for fishmeal and fishoil. Today there are about 200 FIPs in existence, and much points to their further spread. They have also created a spin-off in Aquaculture Improvement Projects.

Not every FIP is explicitly set up to achieve an eco-label. Some fisheries entering into a FIP were so poorly managed that aiming for an eco-label was a waste of time. Those that can declare this intention of obtaining an ecolabel are now called 'comprehensive FIPs', and those that cannot are called 'basic FIPs'. The Mauritanian FIP is a comprehensive one, which suggests it is not too far off the stage of going for an eco-label.

These partnerships between NGOs, the private sector and government authorities start with an assessment of why the sector falls short of gaining the ecolabel, and what needs to be done. The improvements are covered in a workplan, with deliverables intended for each year.

FIPs appeared around 2006, and after a few years US NGOs including Fish Choice, WWF and the SFP decided FIPs should be formalised. In 2008, they created a new NGO initiative called the Conservation Alliance for Seafood Solutions<sup>18</sup>. This published a Common Vision for Sustainable Seafood, with six steps for seafood companies to follow to become sustainable. These six steps all point in the direction of doing a FIP and advancing to eco-labelling, although controversially they do not

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<sup>17</sup> GOREZ, Béatrice, "When people are starving, footage of fresh fish used for fishmeal is disturbing", CFFA-CAPE website, 22 February 2022. Available at: <https://www.cffacape.org/news-blog/when-people-are-starving-footage-of-fresh-fish-used-for-fishmeal-is-disturbing>

<sup>18</sup> See their website: <https://solutionsforseafood.org/>



include a bedrock principle for responsible fisheries: the precautionary approach. Nor do they advocate for the prioritisation of low impact small-scale fisheries, or low carbon fisheries. Their vision is therefore not particularly visionary.

To help implement this vision, in 2012, the Conservation Alliance produced the Guidelines for Supporting Fishery Improvement Projects.<sup>19</sup> These have been updated several times, and recently they have been strengthened with the addition of social criteria. These Guidelines recommend that stakeholders in the FIPs seek the input of organisations working on human rights to undertake this aspect of their assessment. In 2019 the Guidelines were strengthened further by the addition of a Social Responsibility Assessment Tool,<sup>20</sup> developed by another group of US NGOs, led by Conservation International. This Social Responsibility Tool is comprehensive, covering numerous issues such as labour rights, access to social services for fish workers and also the need for fisheries to promote food security and community livelihoods. It also includes the need for seafood companies to have grievance redress mechanisms and respect the highest standards of transparency.

The main eco-labelling companies have actively recommended FIPs, providing technical and financial support. The Marine Stewardship Council created a programme called “In-Transition to MSC”, which allows fisheries to register and apply for financial assistance that derive from public money and philanthropic donations. The Marine Trust has done something similar with their improver programme. The benefits of doing a FIP is partly to boost reputation, but it can also have financial perks.

As such, a whole industry has evolved that tries to regulate and measure progress on FIPs. Fish Choice has provided a global platform for doing this by setting up a new NGO called “Fishery Progress”<sup>21</sup>. This provides a central database with information on all active FIPs in the world. But it doesn’t just describe them, it scores them as well. This scoring system is developed and implemented by the SFP, which is also on the board of Fishery Progress. This is how the FIPs, like the one in Mauritania, are graded from A to E. This score is given to all FIPs on an annual basis according to how well they have delivered on their annual work plans.

#### A) A FLAWED INDICATOR OF SUSTAINABILITY

The scoring of FIPs is one way in which the FIP becomes problematic. Rather than being simply a means of obtaining an eco-label, the simple fact to engage in a FIP has now become an award itself, formalised and legitimate, for seafood companies to exploit for marketing purposes. NGOs are handing out positive grades for sustainability to companies that have only committed to being sustainable in the future. Whether they are sustainable or not does not matter; all that matters is that they are signed up to a FIP.

The nonsense of this situation is evident in the use of FIP scores for the global index on the sustainability of the seafood industry, derived from the global Target 75 campaign. The SFP measures the percentage of seafood industries that are

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<sup>19</sup> Conservation Alliance for Seafood Solutions, “Guidelines for Supporting Fishery Improvement Projects”, revised January 2021. Available at: <https://solutionsforseafood.org/wp-content/uploads/2021/10/Conservation-Alliance-for-Seafood-Solutions-Guideines-for-Supporting-Fishery-Improvement-Projects-Jan-2021.pdf>

<sup>20</sup> Conservation International, “Social Responsibility Assessment Tool for the Seafood Sector: A Rapid Assessment Protocol”, 2019. Available at: [https://docs.wixstatic.com/ugd/2cb952\\_2c49ff86074441428dc979cafaa5be9d.pdf](https://docs.wixstatic.com/ugd/2cb952_2c49ff86074441428dc979cafaa5be9d.pdf)

<sup>21</sup> See their website: <https://fisheryprogress.org/>

sustainable or not, simply by counting the volume of fish that has an ecolabel or derives from a fishery that is part of a FIP. Anything outside of these categories is classified as unsustainable, which can include artisanal fisheries that cannot afford to pay<sup>22</sup> for this procedure. But there is no evidence provided that a fishery in a FIP is sustainable or that it is likely to become sustainable in the future. There is of course also a lot of evidence that MSC and Marine Trust routinely certify fisheries that are unsustainable, as demonstrated in multiple peer reviewed papers.<sup>23</sup> The resulting index on the sustainability of global seafood products is a farce. It is NGO advocacy on behalf of seafood companies masquerading as rigorous science.

The danger is that some organisations might mistake this as something credible. Governments may use these bogus sustainability awards to provide awarded companies preferential access to fish resources, diminishing opportunities for more sustainable users, including small scale fisheries. The false scores are also used by seafood companies to justify their behaviours and deflect criticism. The danger of this was made evident when the global study documenting the various problems<sup>24</sup> of the fishmeal industry, was published by the NGO Changing Markets Foundation. The IFFO, acting as the industry's protector, rebutted the report's findings by using the results of the SFP's index, arguing that most of the fishmeal industry was sustainable or improving<sup>25</sup>. The purpose of the index is to encourage companies to score better. Yet it seems to do the opposite; it protects companies from constructive criticisms that might drive necessary reforms in the industry.

### B) WHAT DOES IT TAKE TO GET AN A-GRADE?

The Guidelines for scoring FIPs, including the recent additions of the social criteria, suggest the scoring of FIPs is rigorous. It is not. Work plans developed for FIPs are often merely tick boxes of things that government and companies should be doing anyway. Each work plan can have multiple indicators, which are all treated as equal under the scoring system developed by the SFP. Many indicators are just bureaucratic activities, for which the relationship with achieving sustainability is tenuous. And for non-delivery of work plan items, it is always easy for FIP members to re-write work plans to shift objectives.

In the case of Mauritania this unconvincing approach is evident. The work plan developed for the coastal small pelagic fishery originally had 8 objectives. These included things like improving catch data, supporting the government in re-drafting management plans, and supporting government efforts to better enforce laws for fishing vessels. The A-Grade was awarded because members of the FIP could point to activities that supported these objectives, such as meetings taking place between companies and government scientists. These are perhaps necessary activities to help address long-standing management problems, but they are not sufficient indicators to demonstrate any actual improvement in the fisheries' sustainability.

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<sup>22</sup> "Certification Standards for Artisanal and Developing World Fisheries - What are the key challenges these fisheries are facing?", FAQ, CFFA-CAPE website. Available at: <https://www.cffacape.org/certification-schemes>

<sup>23</sup> LE MANACH, Frédéric et al., "Small is beautiful, but large is certified: A comparison between fisheries the Marine Stewardship Council (MSC) features in its promotional materials and MSC-certified fisheries", PLOS ONE 16(6): e0253486. Available at: <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0231073>

<sup>24</sup> "Fishing for catastrophe: How the global aquaculture supply chains are leading to the destruction of wild fish stocks and depriving people of food in India, Vietnam and The Gambia", Changing Markets Foundation, October 2019. Available at: <https://changingmarkets.org/wp-content/uploads/2019/10/CM-WEB-FINAL-FISHING-FOR-CATASTROPHE-2019.pdf>

<sup>25</sup> "IFFO counters "inaccurate" reduction fishery report", The Fish Site, 19 April 2019. Available at: <https://thefishsite.com/articles/iffo-counters-inaccurate-reduction-fishery-report>



One of the activities of the FIP relates to improving monitoring of vessels and factories activities, given reports of high levels of illegalities. The information provided in the latest annual review suggests not much has happened on this front and this has remained largely the same for the past five years. But inexplicably the assessment gives a positive score of this activity being ‘on track’. It is of course extremely difficult for private sector stakeholders to ensure the government monitors and controls their industry more effectively, even if there is genuine interest in doing so. But a credible assessment in Mauritania is that for the time being, this activity is not working.

The most eye-catching objective of the FIP in Mauritania is to “*refocus the fishery on human consumption*”. That is a surprising, but welcome, inclusion in the FIP given that the FIP is driven by companies that want to buy fishmeal and fishoil. It seems unlikely that they will push hard for management reforms that undermine their business interests. It is therefore unsurprising that there is no attempt to measure progress on this objective. It is also the only objective without a timeframe. The FIP provides no baseline data, nor does it report on annual statistics showing what proportion of fish go to the reduction factories and what goes for human consumption. If progress on this objective was measured then the FIP would have to score badly.

Other reports have confirmed that during the FIP’s existence production of fishmeal and fishoil has in fact increased, while the amount of fish being sold for human consumption has declined. Last year, the production substantially increased, reaching 60,000 tonnes of fishmeal and 10,000 tonnes of fishoil for the first semester of 2021.<sup>26</sup> This means that if the trend continued, by the end of the year, more than 600,000 tonnes of fresh fish<sup>27</sup> would have been processed into fishmeal and fishoil.

So, in summary, over five years while the FIP has been operating, fishmeal and fishoil production has increased and there is no evidence that compliance by fishing vessels has improved. Scientific stock assessments for the fishery are weak, but the best available information<sup>28</sup> continue to show that small-pelagic fish used in the reduction industry are heavily overfished. Independent scientific analysis continuously highlights overcapacity in the fish reduction industry as a major cause for concern. Remarkably, despite all this, the FIP has managed to be awarded an A-Grade for its progress.

This A-Grade represents the antithesis of the precautionary approach. It acts as a green flag for an industry where the available evidence demonstrates the fishing on which it is based is not sustainable. On what grounds the SFP decided to make the Olvea Group champions of sustainability in 2019 is baffling.

### C) AVOIDING SOCIAL RESPONSIBILITY

When it comes to the social criteria of the FIP, including the industry’s impact on food security and economic development, as well as its transparency and grievance redress mechanisms, this has not been assessed yet in Mauritania. It is left as a blank

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<sup>26</sup> OESP, *Bulletin d'Information et d'Analyse*, Ministère des Pêches et de l'Économie Maritime, Observatoire économique et social des pêches, 1<sup>er</sup> semestre 2021. Available at:

[https://www.peches.gov.mr/IMG/pdf/bulletin\\_fr\\_oesp\\_1er\\_semestre\\_2021.pdf](https://www.peches.gov.mr/IMG/pdf/bulletin_fr_oesp_1er_semestre_2021.pdf)

<sup>27</sup> GOREZ, Béatrice, “When people are starving, footage of fresh fish used for fishmeal is disturbing”, *op. cit.*

<sup>28</sup> FAO, “Report of the Working Group on the Assessment of small pelagic fish off Northwest Africa”, CECAF, R1309/R1309 (Bi), Casablanca, 8-13 July 2019. Available at: <https://www.fao.org/3/ca9562b/CA9562B.pdf>

field on the information published on Fishery Progress. It is therefore not included in the grading system. This is objectionable because these issues are the basis for so much of the protests surrounding the reduction industry.

The Global Roundtable set up by the SFP and the IFFO claims “*it is researching this issue*”. Yet does it need to? There are now multiple independent reports documenting the range of negative social and economic impacts of the reduction fishery, including from the FAO Fisheries and Aquaculture Department, which the Chair of the Global Roundtable used to run. Again, the precautionary approach is jettisoned, with the reduction industry and their supporting NGO preferring to continue with business as usual.

This Roundtable is predominantly an industry lobbying forum run by the IFFO which has a long track record of protecting its corporate members. And despite its claim to take social responsibility seriously, the Roundtable does not appear to be open for other organisations, such as those representing the rights of small-scale fisheries in West Africa or those monitoring human rights and food security.

#### D) CONFLICTS OF INTERESTS

The credibility and reliability of the eco-labelling industry is undermined by widespread conflicts of interests. The entire industry of ecolabelling is one where claims of independence are rendered meaningless because certifying bodies are employed by the seafood companies they claim to assess. There is a great deal of discretion afforded to these certifying bodies, so it is understandable they often give positive scores to companies that do not deserve them. It would be counterproductive for certifying bodies to gain a reputation for being tough on companies, because it is the companies that get to choose who does their assessment.

The problems in the certifying process are well documented for the MSC. However, things are perhaps even worse for the Marin Trust ecolabel. This is supposedly an independent body that assess the sustainability of fisheries producing fishmeal and fishoil. However, it was set up by the IFFO and the IFFO’s director is on its governing board. Kevin Fitzsimmons, a professor at the University of Arizona, called this “*a quasi in-house certification body...akin to having the fox guard the henhouse*”.<sup>29</sup>

The SFP’s role in all this is perhaps the most worrying aspect. It presents itself as an independent environmental NGO working to advance sustainable fishing. It is a key gatekeeper of information on the sustainability of companies. Yet its annual report on progress in this sector for the T75 campaign is sponsored by Cargill and Skretting, the same companies that are members of the FIP in Mauritania. Making matters worse, it has now partnered the IFFO and companies such as Cargill and Skretting in establishing and running the Global Roundtable.

The SFP, like many other environmental NGOs defend these corporate partnerships on the grounds that working with the industry through voluntary commitments and market incentives is the best way to reform them. These partnerships have gone too far and are now too heavily invested in the commercial success of seafood companies. It is bad governance for an NGO that champions companies and collaborates with

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<sup>29</sup> FITZSIMMONS, Kevin, “Op-ed: IFFO is wrong on alternative feeds”, Seafoodsource website, 20 October 2020. Available at : <https://www.seafoodsource.com/news/aquaculture/op-ed-iffo-is-wrong-on-alternative-feeds>

them to then act as an independent assessor of their sustainability and progress on things like FIPs. How could it say anything negative about its corporate partners?

## Conclusion

There are valid arguments for seafood companies to be included in participatory approaches to improving the environmental and social aspects of fisheries. Yet this has to be done with upmost care to avoid perpetuating power imbalances and the blatant risk of greenwashing. The FIP in Mauritania presents some good intentions, particularly in its stated aims of improving fisheries management and supporting the increase of fish for direct human consumption. But it is impossible to take it seriously and accept its claims that it is making excellent progress.

The various positive scores given to companies investing in the fishmeal and fishoil industry in West Africa shows how vulnerable the world of seafood labelling has become to corporate capture. The implications are worrying. It is a process that legitimises the reduction fishing sector and provides them with unwarranted additional political influence.

The small-pelagic fishery in West Africa continues to require substantial improvements in its governance, particularly at the regional level. The priorities need to focus on recovering fish populations and safeguarding food security and livelihoods. However, the current trend points to a growing domination of industrial fishing methods to supply dirty factories producing fishmeal and fishoil for exports.

The ultimate flaw of the FIP and the work of the SFP is the resistance to see the wider picture. At most what they strive to do is improve this industrialised extractive industry, which exists to provide inputs to damaging industries like commercial aquaculture and intensively reared animals in Asia, Europe and North America. This is not a credible vision for a sustainable fishery and food production system. Rather, the aim should be to promote low impact artisanal fishing for direct human consumption in West Africa.

Environmental NGOs wanting to improve the governance of marine fisheries in this region should remain focused on that vision, rather than muddying the water by handing out bogus sustainability awards for companies that clearly do not deserve them. It is incredulous to justify these on the idea that awards incentivise companies to improve their behaviour overtime. What is the point of trying to certify the unsustainable?

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Kenya, 14 June 2022