



Teresa Ribera  
Minister for the Ecological Transition and the Demographic Challenge

Dear Minister Ribera

**Re: Marine Biodiversity in areas Beyond National Jurisdiction (BBNJ)**

We are writing on behalf of the Global Tuna Alliance (GTA), the Sustainable Seafood Coalition (SSC), and the Hong Kong Sustainable Seafood Coalition (HKSSC) regarding the ongoing negotiations for a high seas treaty on Biodiversity in areas Beyond National Jurisdiction (BBNJ) due to resume at the United Nations in New York in August 2022. The GTA, SSC and HKSSC urges you to seek the expeditious and ambitious conclusion of negotiations and conclude a robust global Treaty as soon as possible.

A new treaty will fill a significant governance gap over the sustainable management of biodiversity in half of the planet, the High Seas, and will lead to the implementation of measures such as area-based management tools, including Marine Protected Areas; this is aligned with the growing number of Governments, including Spain, calling for at least 30% of the world's oceans to be protected from damaging activity by 2030<sup>1</sup> under the Convention on Biological Diversity. In addition, Spain has made commitments to protecting marine biodiversity through joining the Blue Leaders and the adoption of the UN Sustainable Development Goals (SDGs), in particular SDG 14 on 'life below water'.

Our businesses buy significant volumes of seafood caught by Spanish fleets and want to source from healthy and sustainable fisheries, which are intrinsically linked to a healthy marine ecosystem. Our members are calling for increased protection of the High Seas. Currently only ~1% of the High Seas are protected and there is insufficient oversight or accountability of activities that could impact on the global commons, in particular commercial fishing<sup>2</sup>. While commercial fishing stands as the largest direct stressor on biodiversity beyond national jurisdiction, the engagement of Regional Fisheries Management Organizations (RFMOs) in the past 15 years of the BBNJ process have been minimal, to the detriment of the treaty's ambition.

The seafood sector both benefits from and is a pressure on High Seas biodiversity, accordingly we recognise the need for strong high seas protection. We acknowledge that commercial fisheries impacts represent the largest direct driver of biodiversity decline in the High Seas<sup>3</sup> and we believe

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<sup>1</sup> As of July 2022 100+ Governments were members of either or both the High Ambition Coalition and Global Ocean Alliance

<sup>2</sup> <https://www.protectedplanet.net/en/thematic-areas/marine-protected-areas>

<sup>3</sup> Crespo, G.O. and Dunn, D.C., 2017. A review of the impacts of fisheries on open-ocean ecosystems. ICES Journal of Marine Science, 74(9), pp.2283-2297.

[https://www.researchgate.net/publication/317620510\\_A\\_review\\_of\\_the\\_impacts\\_of\\_fisheries\\_on\\_open-ocean\\_ecosystems](https://www.researchgate.net/publication/317620510_A_review_of_the_impacts_of_fisheries_on_open-ocean_ecosystems)

that a new BBNJ treaty has an important role to play in helping manage High Seas biodiversity sustainably, most of which remains unmonitored and unmanaged<sup>4 5</sup>.

The GTA, SSC and HKSSC are calling on nations:

- To conclude a robust global Treaty as soon as possible, to alleviate pressure on High Seas biodiversity. This should include the provision of marine protected areas and ensuring future potentially harmful activities are assessed thoroughly through environmental impact assessments.
- To properly integrate an ecosystem approach in policy-making in all relevant divisions of Government and processes, and to use the High Seas Treaty as an opportunity to ensure that the balance between conservation and sustainable use of marine biological resources is achieved.
- Include retailers and suppliers of seafood, such as GTA and SSC members, in stakeholder consultations when developing the detail of the treaty to offer a practical view of the market, and public expectations.

Our partners would welcome the opportunity to discuss this further.

Yours sincerely,

Dr Tom Pickerell, Executive Director of the Global Tuna Alliance  
Oliver Tanqueray, Sustainable Seafood Coalition Coordinator  
Jacqui Dixon, Technical Advisor, Hong Kong Sustainable Seafood Coalition

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The GTA is a precompetitive collaboration of 49 independent retailers, suppliers, wholesalers, and brands active in the seafood sector and with a major interest in improving the sustainability of the tuna sector in a socially and environmentally responsible way. Collectively, these companies form one of the world's biggest networks of seafood wholesalers and suppliers to the consumer, particularly of tuna, purchasing bought 1.6m tonnes of tuna in 2021 (32.4% of the global catch) worth US \$2.35bn (dock price) in 2021 alone.

The SSC is a group of 45 businesses that collaborate to tackle pressing sustainability challenges facing seafood supply chains in the UK. Its members represent all sectors of the seafood industry, from the largest retailers to individual fish and chip shops.<sup>6</sup> Its vision is, quite simply, that all seafood sold in the UK comes from sustainable sources.

The HKSSC is a coalition of 17 industry members of seafood suppliers, restaurants, hotels, and retailers aiming to advance the sustainable seafood market in Hong Kong and Macau through good sourcing

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<sup>4</sup> Crespo, G.O., Dunn, D.C., Gianni, M., Gjerde, K., Wright, G. and Halpin, P.N., 2019. High-seas fish biodiversity is slipping through the governance net. *Nature ecology & evolution*, 3(9), pp.1273-1276  
<https://www.nature.com/articles/s41559-019-0981-4/>

<sup>5</sup> Pacoureau, N., Rigby, C.L., Kyne, P.M., Sherley, R.B., Winker, H., Carlson, J.K., Fordham, S.V., Barreto, R., Fernando, D., Francis, M.P. and Jabado, R.W., 2021. Half a century of global decline in oceanic sharks and rays. *Nature*, 589(7843), pp.567-571. <https://www.nature.com/articles/s41586-020-03173-9>

<sup>6</sup> Sustainable Seafood Coalition members: <https://www.sustainableseafoodcoalition.org/members/>

practices. Its vision is for all seafood imported into Hong Kong and Macau to be legal, traceable and biologically sustainable.