

Brussels, 27 August 2009

Dear Secretary-General,

Re: Result of the Interservice Consultation on a common position on EU proposal to be submitted at the CITES 15th Conference of Parties and Atlantic bluefin tuna (*Thunnus thynnus*).

As reported in today's European Voice, we expect the results tomorrow of the results of the inter-service consultation on a draft common position for the 15th COP of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). This would have the effect of supporting the proposal from the Principality of Monaco to list the Atlantic bluefin tuna (*Thunnus thynnus*) under Appendix I of the Convention.

WWF and Greenpeace understand that following the inter-service consultation, this matter will in all probability be considered by Commissioners directly, perhaps as early as next Wednesday (2 September).

Our two organizations understand that the approval process in the Commission for CITES listing has been an objective process, governed by the criteria set down by CITES. For that reason, we are concerned that some of the objections to the proposal raised by some countries, in particular Japan, and reported questions from DG MARE, fall outside this objective framework. We hereby present our views on the proposal currently before the Commission below.

State of depletion of Bluefin tuna

The last assessment made by scientists from the International Commission for the Conservation of Atlantic Tunas (ICCAT) in 2008 showed that the breeding stock has declined from slightly above 300,000 tonnes in 1955 to only 78,700 tonnes in 2007, with the bulk of this decline happening in recent years. A subsequent analysis by WWF predicts that with the current rate of decline, the spawning stock would virtually disappear by 2012. This collapse trend is corroborated by the dramatic decline of the mean size of fish caught, and some experts predict that even under a complete fishing ban there are significant chances that the stock will continue to decline to record lows.

ICCAT

This critical situation has been reached after the repeated failure of ICCAT, the regional fisheries management organisation (RFMO), and its contracting parties to ensure a sustainable management of this lucrative fishery. ICCAT has systematically disregarded scientific advice in setting management measures, even after its own scientists assessed illegal catches as being twice the legal catch limit and recommended the closure of all known spawning areas to fishing. Additionally, ICCAT has also failed to follow the recommendation of its own independent performance review. In 2008, the review panel called the management of the tuna fishery an "international disgrace" and recommended an immediate closure of the bluefin tuna fishery, as this would be "the only way to stop the continuation of what is seen by observers and by other contracting parties as a travesty in fisheries management". The review panel further urged ICCAT to amend the management of Atlantic bluefin tuna in keeping with scientific advice. Finally, ICCAT chose to ignore a resolution issued by the World Conservation Congress of October 2008 expressing the same recommendation.

CITES listing criteria met

In this context, and based on the evidence that Atlantic bluefin tuna fits the listing criteria for its inclusion on Appendix I of the CITES Convention, the Principality of Monaco has prepared a proposal to list bluefin tuna on Appendix I of the Convention.

The EU's support for listing of commercially exploited aquatic species under CITES is not uncommon. The EU has sponsored or co-sponsored proposals for European Eel, Humphead Wrasse, Mediterranean Date Mussel, Basking Shark, Spiny Dogfish and Porbeagle, as well as voting in favour of proposals for the listing of Great White and Whale sharks.

The Governments of France, the United Kingdom, the Netherlands, Germany and Austria have already made public their support for this proposal made by Monaco. Particularly significant is the support of France, the world's main bluefin tuna fishing nation. On 16 July 2009, President Sarkozy publicly stated the commitment of France "to achieve the inclusion of bluefin tuna in the CITES list, to ban international trade in the species¹". He also stated that the objective was no other than "to protect resources now to ensure fishing in the future".

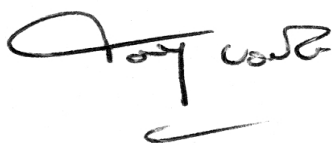
It should be said that Monaco does not envisage a permanent trade ban for the species. It recognises that some CITES Parties would have concerns about an Appendix I listing and has proposed an innovative mechanism to meet these concerns. The proposal is accompanied by a draft Resolution which would mandate the Standing Committee to ask the Depositary Government (Switzerland) to submit a proposal to a future CoP for a downlisting to Appendix II should ICCAT put appropriate management measures in place and should the stocks show signs of recovery.

Conclusion

The Green Paper currently out for consultation on the Reform of the Common Fisheries Policy is a candid admission that current policy frankly is not working. Among the causes for this serious policy failure is the routine ignoring by policy makers of scientific advice. In fact, one needs to look no further than the RFMO responsible for blue fin tuna, ICCAT, to see what has gone wrong when political considerations overrule scientific ones. The proposal to list Atlantic bluefin tuna (*Thunnus thynnus*) under Appendix I of the Convention does not at a stroke put these broader policy failings to right. But it does buy us time to save this iconic species from extinction while we get on with the broader serious reform agenda. It is for this reason we are writing to you to commend Annex 1 listing.

Thank you for your attention to this urgent matter. In light of large public interest in this matter, we intend to make copies of the letter more widely available.

Yours sincerely,



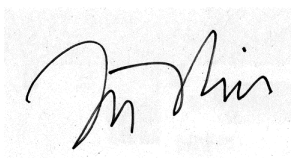
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¹ "France's maritime policy", Speech by President Sarkozy, Le Havre, 16 July 2009.