

January 19, 2017

Mr. Rupert Howes, Chief Executive
Dr. Werner Kiene, Chair of the Board
Marine Stewardship Council
Marine House
1 Snow Hill
London EC1A 2DH

Dear Mr. Howes and Dr. Kiene:

On behalf of the undersigned conservation and animal protection organizations and the millions of citizens which support them worldwide, we are writing to express our deep concern regarding the Marine Stewardship Council (MSC) certification process, especially for those fisheries that involve the bycatch of chondrichthyes (sharks in particular) and cetaceans (whales, dolphins and porpoises). Many of our organizations have commented on fishery assessments under the MSC process, and over the years we have noted an apparent, and deeply worrying, lack of concern regarding the potential impacts on these species, as well as certain target species.

It is our view that many of the fisheries that have been assessed via the MSC certification process have not been subject to an adequate review of information available on bycatch of non-target species. Often the Conformity Assessment Body (CAB) involved in an assessment fails to provide a robust and consistent evidence base for bycaught and Endangered, Threatened and Protected (ETP) species. There also appears to be a great deal of subjectivity in interpreting evidence and deciding on the severity of impacts of a given fishery, to the detriment of non-target species affected by that fishery.

For many species of marine mammals and pelagic sharks, there is a lack of available stock assessments, leading to a high level of uncertainty as to their status.¹ The scoring guidelines under MSC Principle 2 aim to maintain bycaught secondary and ETP species above a “biological based limit” where the fishery does not hinder recovery. However, given that in-depth stock assessments are not available for such species, it means that biologically based safe limits have not been established, often making MSC guidelines under Principle 2 impossible to apply. It is a scientific principle that an absence of evidence should not be taken as evidence of an absence of impacts. This is an essential part of the precautionary approach to fisheries management. However, even when the CABs involved in the certification process acknowledge this lack of

¹ In addition, the few studies which have been made on the evolution of these species numbers over time are not very promising. See for example Myers, *et al.* (2007) Cascading effects of the loss of apex predatory sharks from a coastal ocean. *Science* 315: 1846-1850, Myers and Worm (2003) Rapid worldwide depletion of predatory fish communities. *Nature* 423, Dulvy, *et al.* (2014) Extinction risk and conservation of the world's sharks and rays. *Elife*, Collette, *et al.* (2011) High value and long life - Double jeopardy for tunas and billfishes. *Science* 333: 291-292.

data, as has been noted above, fisheries have still been recommended to receive the MSC stamp of approval.

While there are a large number of MSC client fisheries about which we have serious worries, we identify below certain fisheries that best represent our concerns with the current MSC assessment process, and its failure to adequately address the conservation of target and non-target species.

The Atlantic Canadian Swordfish Longline Fishery

A deeply troubling case in which MSC certification was granted, despite known high levels of shark bycatch, was the 2011 Northwest Atlantic Canadian Swordfish Longline Fishery. At the time of certification, this fishery was acknowledged to kill 35,000 endangered, vulnerable and near-threatened sharks per year, as well as impacting 200-500 endangered sea turtles annually.² Despite the knowledge that this fishery has a very high bycatch to target catch ratio, and that the quantity of bycaught species can even exceed that of the target species,³ MSC granted certification. In addition to the concerns regarding mortality rates of non-target species, the certification of this fishery also highlighted another key deficiency with MSC certifications--the failure to place strong conditions on the fishery to reduce and hopefully eliminate bycatch. Indeed, in numerous MSC certified fisheries with known bycatch, there is a failure to apply any conditions at all.⁴

Several organizations objected to this fishery obtaining MSC certification (the David Suzuki Foundation, the Ecology Action Centre, Oceana and Sea Turtle Conservancy), but the certification was upheld. However, a recent doctoral thesis that looked at the conditions placed on this fishery in terms of their ability to address bycatch mitigation found that there has been, *inter alia*, a lack of accountability by the client, concerns over the quality and quantity of observer coverage, and a failure to include all bycaught species in logbook reports,⁵ thus

² See e.g. Catch composition from observer reports on ETP species to Canada's Department of Fisheries and Oceans, 2002 to 2009, Brazner JC and McMillan J. 2008. Loggerhead turtle (*Caretta caretta*) bycatch in Canadian pelagic longline fisheries: Relative importance in the western North Atlantic and opportunities for mitigation. *Fish. Res.* **91**:310–324; Caruthers, E.H. *et al.* (2009) Estimating the odds of survival and identifying mitigation opportunities for common bycatch in pelagic longline fisheries. *Biological Conservation*, [volume 142, Issue 11](#), November 2009, Pages 2620–2630. For further concerns raised about the certification of this fishery, see <http://www.davidsuzuki.org/media/news/downloads/2011/Expert-letter-opposing-Atlantic-Canadian-Swordfish-Longline-Fishery.pdf>

³ See e.g. Campana, S.E., Brading, J., & Joyce, W. (2011). Estimation of pelagic shark bycatch and associated mortality in Canadian Atlantic Fisheries (CSAS Research Document 2011/067) and Lewison, R.L., Crowder, L.B., Read, A.J., & Freeman, S.A. (2004). Understanding impacts of fisheries bycatch on marine megafauna. *Trends in Ecology and Evolution*, **19**, 598-604.

⁴ Of major concern is the lack of conditions mandating a sufficient level of observer coverage to guarantee robust estimates of bycatch. At least 20 percent or more coverage may be needed, and where rare species are involved, this need rises to between 50 to 100 percent. See e.g. Gilman, E. *et al.* 2012. Performance Assessment of Bycatch and Discards Governance by Regional Fisheries Management Organizations, IUCN, Gland and Debski, I. *et al.* 2016. Observer coverage to monitor seabird captures in pelagic longline fisheries, WCPFC-SC12-2016/EB-IP-07. However, for many of the MSC certified fisheries, there is little to no observer coverage in place and conditions fail to call for the levels mentioned above. Even when conditions are put in place, they often fail to improve information collection. https://abcbirds.org/wp-content/uploads/2015/05/ABC_Analysis_of_MSC_Certification_on_Seabird_Bycatch_Pt_1_Report.pdf

⁵ Wang, R. 2013. Analyzing bycatch mitigation in the MSC-certified Canadian Northwest Atlantic longline swordfish fishery. Thesis submitted for the degree of Master of Marine Management at Dalhousie University, Halifax, Nova Scotia. 95 pp.

confirming issues raised by NGOs over the efficacy of the conditions applied to the Northwest Atlantic Canadian Swordfish Longline Fishery.

Antarctic krill fisheries

The Aker Biomarine Antarctic krill (*Euphausia superba*) fishery was certified in 2009. Although not directly through bycatch, this fishery has a significant ecosystem impact on marine mammals. Indeed, most Antarctic marine mammals feed on krill, and research reveals that the cumulative impact of the fishing activity and climate change on krill is leading to declines in their predators.⁶ Certification of this fishery was objected to by the Antarctic and Southern Ocean Coalition, but the objection was not accepted.

In 2015, despite the fact that the new public certification assessment report for the fishery acknowledged that “there is no annual or updated stock assessment of krill available, just new assessments of old data sometimes with fresh assumptions or different interpretations of parameters” and an acknowledgment that rapid climate change in the Antarctic has a “direct causal relationship between variability in sea-ice cover, krill recruitment, prey availability and predator foraging ecology”,⁷ the Aker Biomarine krill fishery was re-certified. Another krill fishery, the Rimfrost Antarctic krill fishery was certified in 2015, despite similar concerns as to data deficiency and ecosystem changes being acknowledged⁸ and the fact that krill-dependent cetacean stocks remain depressed in Antarctica.⁹

The NZ Orange roughy deep-sea bottom trawl fishery

The New Zealand orange roughy fishery has had a long history of serial depletion and repeated stock crashes.¹⁰ Throughout the assessment process for this fishery, NGOs raised concerns as to the unsustainability of orange roughy fish stocks, and the fact that there had been known under-reporting and dumping of fish species, including misreporting of orange roughy landing data. A recent report –cited by those groups contesting the certification-- showed that for

⁶ Jacquet, *et al.* (2016) ‘Rational use’ in Antarctic waters. *Marine Policy* 63: 28-34.

⁷ Hønneland, G., *et al.* (2015) Aker Biomarine Antarctic Krill Fishery - Public Certification Report. Food Certification International Ltd, January 2015. 20150116-PCR_v2-KRI001.

⁸ Hønneland, G., *et al.* (2015) Olympic Seafood Antarctic Krill Fishery - Public Certification Report. Food Certification International Ltd, August 2015. 2015082-PCR-KRI481.

⁹ Ainley, D.G. and Pauly, D. (2014). Fishing down the food web of the Antarctic continental slope and shelf. *Polar Record* Volume 50, Issue 1, January 2014, pages 92-107.

¹⁰ See *e.g.* Clark, M.R. *et al.* (1999) The effects of commercial exploitation on orange roughy (*Hoplostethus atlanticus*) from the continental slope of the Chatham Rise, New Zealand, from 1979 to 1997. *Fisheries Research* 45 (2000) 217-238 and Norse, E.A. (2012). Sustainability of deep-sea fisheries. *Marine Policy* 36, pages 307-320.

decades there had been serial misreporting of New Zealand catch statistics; a government report acknowledged as well that there had been grave concerns regarding discards of fish for years.

In June of 2016, WWF, the Deep Sea Conservation Coalition, Greenpeace, BLOOM Association and ECO-NZ objected to the certification of the fishery, citing the above information as well highlighting the negative impacts of deep-sea bottom trawl fisheries on both ETP species of coral and vulnerable marine deep-sea ecosystems. Recent scientific studies have shown that deep-sea bottom trawl impacts are “...effectively irreversible on time-scales of natural ecological processes” and that recovery times for impacted deep-sea megabenthos can take centuries to millennia.¹¹ However, the objection was not ultimately successful and the New Zealand orange roughy fishery was certified in December 2016.

The Gulf of Maine lobster fishery

Another example of concern is the recently proposed certification of the Gulf of Maine Lobster Fishery. The CAB for this fishery has recommended certification despite the fact this fishery potentially impacts several species of cetaceans listed by the United States as endangered. Ropes used by fixed-gear trap (also known as pot) fishers from Canada and the East Coast of the United States are known to occasionally entangle large whales.¹² The CAB itself acknowledged that, “[t]he assessment team has no doubt that U.S. lobster fisheries including the Gulf of Maine lobster fishery pose a significant risk to endangered large whales.”¹³ The population size of one of those endangered large whales, the North Atlantic right whale (*Eubalena glacialis*), is currently estimated to be 450. A single mortality of a right whale is above what could be considered a biologically safe removal level.¹⁴ A number of other MSC certified lobster fisheries overlap with the right whales’ range, making the potential for cumulative impacts of MSC fisheries on this endangered species even greater, yet the fishery has been proposed to receive the MSC label.

¹¹ Clark, M. R., Althaus, F., Schlacher, T. A., Williams, A., Bowden, D. A., and Rowden, A. A. (2016) The impacts of deep-sea fisheries on benthic communities: a review. *ICES Journal of Marine Science*, 73: i51–i69.

Clark, M., Anderson, O., Dunkin, M., Mackay, K., Notman, P., Roux, M-J. & Tracey, D. (2015) Assessment of orange roughy and oreo trawl footprint in relation to protected coral species distribution. MSC P1 2.3.1. February 2015. NIWA Client Report No: WLG2014-56 prepared for Deepwater Group Limited. 57 p.

¹² McCarron and Tetreault (2012) Lobster Pot Gear Configurations in the Gulf of Maine. Consortium for Wildlife Bycatch Reduction, Maine Lobstermen’s Association, New England Aquarium, . 36 p.

¹³ SAI Global letter to Amy R. Knowlton, Scott D. Kraus, and Timothy Werner, New England Aquarium. August 26, 2016. We note that there are a number of other MSC certified lobster fisheries that impact right whales across their range, leading to the potential for additional cumulative impacts on the species by MSC-certified fisheries.

¹⁴ The current US National Marine Fisheries Service draft assessment of serious injury and mortality to right whales for the years 2010-2015 gives an annual average of 5.16 whales per year against a Potential Biological Removal (PBR) of 1. In September of 2016, and as noted by the CAB, two right whales died due to entanglement in fishing gear, and a third was released, although it is not known whether this whale has survived. Additional information on fishery impacts on right whales can be found at Kraus SD et.al. (2016) Recent Scientific Publications Cast Doubt on North Atlantic Right Whale Future. *Front. Mar. Sci.*, 17 August 2016

This failure to adequately address cumulative impacts of fisheries on what is known as Principle 2 species (i.e. non-target species, including endangered, threatened and protected species) is yet another major concern regarding MSC's commitment to reducing bycatch. While there was improvement in the 2014 MSC revised assessment guidelines as to cumulative impacts for target seafood species (so-called Principle 1 species), the guidelines for Principle 2 species were changed, but remain weak. MSC states that, "...the requirements for Principle 2 remain lower than the requirements applied to species in Principle 1, where all impacts (MSC and non-MSC fisheries) on a stock are considered."¹⁵ Given that Principle 2 species for a fishery can include highly endangered species we believe that this is a major failure of the MSC guidelines.

The Spanish North and South Atlantic Swordfish Fishery

The Spanish North and South Atlantic Swordfish Fishery is another fishery for which a CAB has recently recommended certification. Despite its name, this longline fishery is made up of 75 percent sharks and only 15 percent swordfish. As one of the largest shark-fishing operations in the world, this fishery impacts blue and mako sharks, as well as ETP shark species such as hammerheads, porbeagle and thresher sharks, all of which are listed on Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

The CAB's recommendation for MSC certification for this fishery came despite having acknowledged uncertainty regarding data inputs related to the North Atlantic stock of blue sharks. The CAB further admitted that "the possibility of the stock being overfished and overfishing occurring could not be ruled out." A recent paper, which was referenced by the CAB in its assessment of this fishery, determined that the tracks of Spanish and Portuguese longline vessels overlap with a remarkable 80.7 percent of blue shark range and 79.6 percent of mako shark preferred habitat. This paper further stated that "the persistent use of localized areas that overlap fishing effort indicates potential for overexploitation at the ocean-basin scale."¹⁶ Yet certification has been recommended.

The Northeastern Tropical Pacific purse seine yellowfin and skipjack tuna fishery

A troubling fishery proposed for MSC approval is the Northeastern Tropical Pacific purse seine yellowfin and skipjack tuna fishery, which is part of the InterAmerican Tropical Tuna Commission's management area. The CAB for this fishery has indicated its support for MSC certification, despite the fact it involves the deliberate setting of nets on dolphins. Scientists have noted that there are currently no reliable indicators with which to monitor dolphin abundance in the Northeastern Tropical Pacific, and have called this lack of data

¹⁵ See page 9 at <https://improvements.msc.org/database/fisheries-standard-review/documents/launch-of-the-fcr-v2.0/Summary%20of%20Changes-Fisheries%20Certification%20Requirements%20v2.0.pdf>

¹⁶ Queiroz, N., Humphries, N.E., Mucientes, G., Hammerschlag, N., Lima, F.P., Scales, K.L., Miller, P.I., Sousa, L., Seabra, R. and Sims, D. W. (2016). Ocean-wide tracking of pelagic sharks reveals extent of overlap with longline fishing hotspots PNAS 2016 113 (6) 1582-1587; published ahead of print January 25, 2016, doi:10.1073/pnas.1510090113.

“problematic.”¹⁷ The proposed certification has been objected to by environmental organizations.

Beyond the issue of “numbers” is the ethical consideration involved in the direct targeting of dolphins by tuna fishers. In addition to known mortality, any released dolphins suffer the stress of capture. There is known separation of young dolphins from their mothers, and serious injuries can also occur which could eventually lead to additional mortality. Other tuna management bodies, including the Indian Ocean Tuna Commission and Western and Central Pacific Tuna Commission have passed resolutions stating that the deliberate setting of nets on dolphins should not take place.¹⁸ While concerns have been raised about bycatch of non-target species in floating object-related sets in purse seine yellowfin and skipjack tuna fisheries (promoted as an alternative to dolphin sets), there is another option available to both cetacean and fish aggregating device (FAD) sets, *i.e.* free school sets in which levels of bycatch are far lower than those found in object/FAD related sets.¹⁹

We urge the MSC not certify those fisheries named above that are still pending certification, to re-assess the certifications of those named fisheries that have received MSC approval, and to clarify its standards so that it is not possible that unsustainable fisheries are certified.

In addition, we request that the MSC :

- forbids the entry of fisheries catching top-predators while using non-discriminatory methods, and fisheries involving the deliberate encirclement of cetaceans in the full evaluation, as it does with fisheries that involve the use of dynamite, poison, and shark finning. Sorting out unsustainable fisheries through the use of clear-cut pre-assessment guidelines would diminish the risk of CABs certifying these fisheries.
- includes IUCN-listed fish species in the definition of ETP species in V2.0 of the MSC standard (version 2.0. of the MSC standard included the amphibian, reptiles, birds and mammal species listed on the IUCN Redlist in the definition of "ETP species", which is a welcomed improvement compared to V1.3 of the standard, yet this acceptance of IUCN guidelines has not been extended to include IUCN-listed fishes).

¹⁷ Scott, M. et.al. (2016) Data available for assessing Dolphin Population Status in the Eastern Tropical Pacific Ocean. <http://www.iattc.org/Meetings/Meetings2016/DolphinWorkshop/IATTC-Dolphin-Workshop-October%202016-Background01.pdf>

¹⁸The IOTC resolutions reads: “Contracting Parties and Cooperating Non-Contracting Parties (collectively, CPCs) shall prohibit their flagged vessels from intentionally setting a purse seine net around a cetacean in the IOTC area of competence, if the animal is sighted prior to the commencement of the set.” See <http://www.iotc.org/cmm/resolution-1304-conservation-cetaceans>. The WCPFC resolution, which contains similar language, can be found at http://bmis.wcpfc.int/docs/decisions/IOTC_2013_Cetaceans_Res_13-04.pdf

¹⁹ Global bycatch rates in tuna purse seine fisheries is 0.6% for free school sets as compared to 2.4% for object/FAD sets. From Agnew, D. (2016). Traceability solutions for tuna fisheries at-sea and into the supply chain. Seafood Web Summit presentation.

- modify its standard so that it addresses adequately all cumulative impacts -fishery and environmental - on target, bycatch and ETP species.

Further, regarding ethical considerations, we are concerned that MSC has certified fisheries in Norway and Iceland in which vessels and/or processing companies listed as certificate shareholders are also engaged in commercial whaling.²⁰

We believe that by certifying fisheries without considering their wider environmental impact and conduct, MSC undermines public confidence in its certification program, and as a reliable environmental certification standard. As consumers look to the MSC “brand” to help them make informed seafood purchasing decisions, our organizations believe that they should be made aware of the fact that an MSC certification does not indicate the absence of shark and cetacean bycatch.

We thank you for your consideration of our concerns regarding MSC certifications of fisheries with significant bycatch. Please feel free to contact Kate O’Connell (Animal Welfare Institute, USA) or Friederike Kremer-Obrock (Sharkproject Germany e.V.) to discuss if you have further questions, or should you elect to reply to this letter.

Sincerely,



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(Animal Welfare Institute)
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On behalf of the following organizations:

²⁰ The Norwegian information is based on a comparison of vessels holding whaling quotas as per Norway’s Fisheries Directorate vessel registry (Fiskeridirektoratets fartøyregister available at www.fiskeridir.no) and MSC assessments. Among those Norwegian fisheries with links to whaling are the Norway North East Arctic and North Sea Saithe Fisheries. The public certification report (PCR) for these fisheries (20130614_PCR_SAI118), states that all Norwegian vessels fishing for saithe are eligible for certification; a number of whaling vessels hold quotas for saithe. The PCR for the Norway Spring Spawning herring fishery (Norway SSH-PCR20140702) is yet another Norwegian MSC certified fishery that lists a number of known whaling vessels among its eligible vessels. An example of a Norwegian processing company that holds MSC certification is the Hopen Fisk AS company (see http://www.hopenfisk.no/images/pdf_doc/MSC%2020.02.2012.pdf). Hopen buys, processes and sells whale meat: <http://www.hopenfisk.no/index.php/nb/produkter/hvalkjott>. In Iceland, the HB Grandi company is linked to the Hvalur whaling company which hunts endangered fin whales. In the past HB Grandi premises have been used to process whale meat, http://awionline.org/sites/default/files/uploads/documents/EIA_Iceland_Whaling_report_0914_FINAL_MEDRES.pdf. HB Grandi is a certificate shareholder for a number of Iceland Sustainable Fisheries (ISF), including cod, haddock, saithe, ling, golden redfish and gillnet lumpfish. See list of client group members at <https://fisheries.msc.org/en/fisheries/isf-iceland-cod/@assessments>. It should be noted that Hvalur did not engage in fin whaling in 2016.

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Stefano Bellomo, GreenRope Coordinator, Italia



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Friederike Kremer-Obrock, President Sharkproject Germany e.V.



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