

Elena Temnova  
Division for Ocean Affairs and the Law of the Sea, OLA  
United Nations Headquarters, New York  
2 UN Plaza, Room DC2-0417  
Tel. +1 212-963-3689  
[temnova@un.org](mailto:temnova@un.org)

(by email)

4<sup>th</sup> March 2020

Dear Elena Temnova

**Letter inviting contributions on the topic of focus of the fifteenth round of Informal Consultations of States Parties to the United Nations Fish Stocks Agreement (NGOs)**

Thank you for the opportunity to provide comment to the United Nations via your email of 5<sup>th</sup> February 2020. IFFO, The Marine Ingredients Organisation, (hereafter “IFFO”) works closely with several UN organisations including the FAO and International Maritime Organisation and sees great importance in engaging with the work of these organisations at a global level. We are grateful to be invited to provide comment through initiatives such as this.

IFFO represents the global production of fishmeal and fish oil, high quality animal feed ingredients supporting global animal protein production, thereby providing significant contributions to global food security. IFFO’s member companies are reliant on global fisheries for raw material supply for their businesses, and the sustainability of the sector is therefore based on having a continued and reliable supply of this raw material via well-managed fish stocks. IFFO fully endorses the approach an Ecosystem Approach to Fisheries (EAF) in this regard.

As mentioned in FAO Fisheries Technical Paper No.443 (The Ecosystem Approach to Fisheries), most conceptual elements and principles of EAF are contained within numerous voluntary arrangements, agreements, conventions and codes adopted across the fisheries industry globally. Not least is this approach included within the FAO’s own Code of Conduct for Responsible Fisheries (CCRF) from 1995, which as noted in the Technical Paper provides the basis and institutional requirement for all aspects relating to EAF. Effective fisheries management is a cornerstone of the sustainability of fisheries, as known for some time

[www.iffonet.net](http://www.iffonet.net)

T: +44 (0)2030 539 195 F: +44 (0)2030 539 196 E: [secretariat@iffonet.net](mailto:secretariat@iffonet.net)  
Unit C, Printworks, 22 Amelia Street, London, SE17 3BZ, United Kingdom  
Registered in England and Wales No. 08206502

and well documented in numerous scientific papers, most recently emphasised in the [paper<sup>1</sup>](#) published by Prof Ray Hilborn and colleagues in January 2020.

The importance of EAF underpinned IFFO's approach in the development of the Global Standard for Responsible Supply (IFFO RS), the leading independent business to business certification programme for the production of marine ingredients. IFFO RS's vision is that all Marine Ingredients produced globally will be responsibly sourced, referring to both fisheries management and production. Within the objectives of the standard there is reference to the CCRF, and the CCRF was used as the benchmark for the fisheries assessment section of the certification standard from its inception in 2007 in order that there is a credible framework for fishery management in place. The IFFO RS is, therefore, also based on the concept and principles of EAF.

The IFFO RS standard has increased in importance for the marine ingredients industry since the first fishmeal plant was certified in 2010. Since that time certification in the industry has expanded to the extent that more than 50% of annual global fishmeal and fish oil supply is certified to IFFO RS.

The more recent advent of the IFFO RS Improver Programme (IFFO RS IP) further drives forward opportunities for the EAF for fishmeal plants in countries and regions where there may be scope for improvement in fisheries management. The IFFO RS IP examines both the fishmeal factory and the fishery supplying the raw material, and it is in the latter where the programme helps to drive change in support of an EAF. The IFFO RS IP adopts the principles of Fishery Improvement Projects (FIPs) in the scheme, thereby helping to improve fisheries and marine ecosystems within a continual process of change. It is clear that the concept of EAF is at the heart of everything the marine ingredients industry does.

In summary, IFFO fully recognises the importance of EAF for the industry's sustainability. It is at the heart of the organisation's business as well as the businesses of IFFO's member companies. Through the continued success of the IFFO RS scheme, there has been widespread recognition of initiatives such as the FAO's CCRF that are based on EAF principles, and IFFO hopes to see this concept extend further in time through the IFFO RS IP and other FIPs associated with the industry.

Yours sincerely,



Dr Neil Auchterlonie  
Technical Director

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<sup>1</sup> <https://www.pnas.org/content/117/4/2218>