



Dear Dr Kiene, Mr Howes, MSC Board and Executive,

Call for improved shark finning policy proposal from MSC

We write as a group of stakeholders with longstanding and serious concerns about the Marine Stewardship Council's requirements regarding shark finning and their inability to deliver on the organisation's stated policy of 'zero tolerance' towards this horrific activity.

Specifically, we write in light of the recent comprehensive rejection by stakeholders of your latest shark finning policy proposal to call on MSC to urgently rethink its approach ahead of the final stages of the Fisheries Standard Review.

MSC workshops and surveys in summer of 2020 saw a strong consensus of stakeholders calling on MSC to introduce a requirement for **all fisheries interacting with sharks** to have a fins naturally attached policy (FNA) in place. **FNA without exemptions** is globally acknowledged as being the only truly effective means of enacting a shark fin ban and should therefore be a minimum requirement for fisheries seeking sustainability certification.

We were therefore shocked and disappointed when MSC revealed its proposed approach for consultation in June this year: fisheries where sharks are a target or primary species would be exempt from a Fins Naturally Attached approach and permitted to continue using an 'alternative approach', despite the well-known loopholes of all existing alternatives.

While MSC has sought to position its proposal as 'Fins Naturally Attached', it is in fact simply an industry-friendly rebranding of the status quo with very limited ability to drive change on the water.

Consequently, MSC's proposal was widely rejected in the most recent round of consultation: 66% of respondents felt it was not aligned with global best practice. Furthermore, the proposal was not acceptable to 68% of respondents.

MSC's policy and decision-making processes are opaque and it is not at all clear to us how your proposal emerged from the inputs which many of us devoted significant time and capacity to last year. This lack of transparency was again emphasised by your rejection of the request by Fin Free MSC to join governance meetings as an observer. However, what is clear is that your proposal does not meet stakeholder expectations, does not represent best practice, and will not be effective in finally eradicating shark finning from certified fisheries.

Fins Naturally Attached with no exemptions has been proven to represent best practice and has consequently been adopted around the world – it is the only approach compatible with MSC's claims to 'zero tolerance' on finning and with achieving its objective of driving fisheries improvements on the water rather than blocking forward movement.

We therefore strongly urge MSC to rethink its proposal and present an updated version for consultation ahead of the TAB and STAC meetings in November and approval of a revised Fisheries Standard text by the Board. We would be delighted to share further input to such an updated proposal and would appreciate the opportunity to meet with your team to discuss.

Yours sincerely,

Birgit Braun

Executive Board Member
Aktionsgemeinschaft Artenschutz (AGA) e.V.

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Director Marine Animal Program
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