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Reykjavík, 26 August 2004

Ref: UTN04070094/47.B.017

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Dan S. Jónsson

It has come to our attention that your organization has issued a pocket guide, a so-called "Seafood Watch Card", the purpose of which is "..... to shift buying habits of consumers to support sustainable fishing and aquaculture operations", according to a mission statement found on your home page (www.montereybayaquarium.org).

While we commend your ambition to promote the sustainable utilization of the living resources of the ocean, we have particular concerns over the way your pocket guide and an associated seafood report represents the condition of one of the fish stocks listed in your guide, Icelandic cod. According to your listing, consumers should avoid Icelandic cod as this fish comes "from sources that are overfished or caught or farmed in ways that harm the environment".

It comes as a particular disappointment to find that your guide contains unqualified and inaccurate generalizations regarding the situation of individual species of fish, including cod in the Atlantic Ocean. Such generalizations are misleading for consumers and ultimately unhelpful in promoting sustainable fishing and aquaculture. A more objective look at the facts would reveal the need to distinguish between areas, years and stocks in assessing the overall situation. To specifically refer to Icelandic cod as a fish to be avoided by consumers is incomprehensible in this respect.

Icelandic authorities are extremely attentive to the conservation of living marine resources, as Iceland's economy depends heavily on the sustainable use of such resources. Marine resources account for more than two thirds of Iceland's exports. Therefore, any disruption of the ecological balance in the sea around Iceland, due to overfishing or physical degradation of the marine environment, would adversely affect the livelihood of Icelanders. This is why our Government has invested substantial expertise and resources in ensuring that the living marine resources in Icelandic waters are properly managed.

As you may be aware, Iceland was among the first countries in the world to extend its economic zone to 200 nautical miles in the year 1975, not least in order to put an end to the

uncontrolled fishing around Iceland by trawlers from other European countries, endangering Icelandic fish stocks. Since then, Iceland has taken great care in maintaining balanced and sustainable fishing in Icelandic waters by enforcing a strict quota system for various fish species, including cod, herring and capelin, based on rigorous scientific assessments and monitoring. The quotas for fishing are based on the recommendations of scientists, who monitor the status of each stock.

The Seafood Report supporting your inclusion of Icelandic cod in the "avoid" list both oversimplifies and overgeneralizes the state of the cod stock around Iceland, besides ignoring most recent scientific findings. This is surprising, especially as your disclaimer makes clear that you strive "to have all Seafood Reports reviewed for accuracy and completeness by external scientists with expertise in ecology, fishery science and aquaculture." Reading the report, it is evident that the authors have cursorily studied the stock situation and the management systems in different areas and countries of Europe. This is regrettable, because the conclusions that can be drawn from the document could have been a valuable and important input to discussions on fisheries management.

In the Executive Summary of the Seafood Report, Vol. I, Atlantic Cod (p. iv), it is stated that Icelandic Cod stocks are "already-depleted stocks". This statement is mistaken. A cod stock of fishable biomass of 854.000 tonnes in 2004 - with an increasing spawning stock - can in no way qualify as a depleted.

Furthermore, it is stated that "In recent years, Iceland has marketed cod very successfully, but "Icelandic Cod" is no more than Atlantic cod caught by Iceland" (p. 1). The cod stock around Iceland is a stock unit that lives in Icelandic waters. The management system and scientific advice concerning allowable catch and the management system are based on that fact. The stock has been marketed as Icelandic cod for decades, both in the USA and Europe, where it has competed other stocks, such as cod from the Barents Sea, the North Sea or the Grand Banks.

In "Status of the Stocks, Europe" (p. 9) reference is made to Iceland's fishery management science agency HAFRO 2003 report: "Both fishable and spawning stock (of cod) are now at historic low levels, and age 6 and younger fish will dominate the catches in coming years". However, in the latest HAFRO report* it is clearly stated that even though fish mortality is at present high, there is a high probability that under the present harvest control rule the fish mortality will decrease considerably in the years to come and the spawning stock will increase to the 1980/81 level of 300 thousand tonnes in the year 2008 (fig. 2.1.10).

Apart from such examples, we question the reasons the Monterey Bay Aquarium may have for singling out "Icelandic cod", one of several Atlantic cod stocks, in its recommendations, while failing to mention the other stocks by name.

The Icelandic Government takes pride in its pioneering scientific work in the field of fisheries, work that has been emulated by many other countries in the world wishing to prevent overfishing.

*<http://www.hafro.is/Astand/2004/engl-sum-04.pdf>

Therefore, we regret that the Monterey Bay Aquarium has found it necessary to launch a campaign of misinformation throughout the United States and Canada, causing possible damage to important Icelandic interests in this field. In so doing, your organization may, in effect, be undermining the cause of sustainable utilization of living marine resources, a cause that Iceland has championed in international fora.

In the belief that the Monterey Bay Aquarium takes an earnest interest in working towards the health of the world's oceans, we expect your organization to issue an appropriate correction to the Seafood Watch pocket guide, as well as the associated Seafood Report, as regards Icelandic cod. In the meantime, our authorities will consider their options as to whether or how they react to the consequences your actions may have brought about, inadvertently or otherwise.

Sincerely yours

A handwritten signature in black ink, appearing to read 'Gunnar Pálsson', with a large, sweeping flourish at the end.

Gunnar Pálsson
Ambassador
Director
Office of Natural Resources and Environment

cc. U.S. Embassy, Reykjavík