Comments on the CFS HLPE V0 Draft on the Role of Sustainable Fisheries and Aquaculture for Food Security and Nutrition (22 Dec 2014)

1. General Comments

The FAO Department of Fisheries and Aquaculture FI welcomes the opportunity to comment on the CFS HLPE V0 Draft on the Role of Sustainable Fisheries and Aquaculture for Food Security and Nutrition.

In general, this V0 DRAFT can serve as a frame for the major issues and important constraints that have affected and hampered sustainable development of the sector, especially in relation to its present and future contribution to food security and nutrition FSN. As such it is a starting point for preparing a thorough study on the subject for presentation at the CFS plenary in 2014. However, and as this draft states, it is “*deliberately presented – with [its] range of imperfections – early enough in the process ... when sufficient time remains to give proper consideration for feedback received so that it can be really useful and play a real role in the elaboration of the report*”.

Indeed, there are significant and worrying deficiencies in the draft report, possibly due to the fact that the main authors confined themselves often to their areas or work and did not reach out to other sources, views and works. This is why it is very important that the HLPE, strong on sociology, scrutinizes critically the various contributions provided during the first e-consultation and during this one. FI feels that the value of its first contribution, and many other important ones by leading authors and institutions, were only marginally debated or considered. As an example, to assess how can the implementation of the FAO Code of Conduct for Responsible Fisheries CCRF and Aquaculture be further improved globally for sustainable aquatic resource management, FI suggested that the HLPE study should consider the overall work by the owners of the CCRF: FAO Members, the FAO Committee on Fisheries COFI and the secretariat FI. Not only the CCRF, but also other Code-relevant instruments and support for their implementation at national, regional and global levels should be looked into. This V0 Draft failed to do that. The role of the Regional Fisheries Bodies RFBs, including the Regional Fisheries Management Organizations RFMOs, and the importance of market instruments, such as eco-labelling and certification, are hardly considered.

While FAO recognizes in its work the special importance and challenges of small scale fisheries and aquaculture SSFA, it is important to highlight that this study is about the role of fisheries and aquaculture (small and large scale, artisanal and industrial, small and large fish, demersal and pelagics, including crustaceans and cephalopods) to FSN. V0 draft gives the impression that the HLPE has been tasked to look mainly at SSFA and the impact of large scale or commercial operations is considered more often under the prism of how negatively it can impact SSFA, but rarely on how these operations contribute fish to markets and food security, in developed and developing countries (e.g. the importance of supply of fresh, frozen, cured or canned pelagic fish such as sardines, mackerel or herrings to Sub-Saharan Africa or Egypt).

The V0 fails to consider appropriately important works such as the Rio+20 Outcome document “The Future We Want”, which in para 113 states: *We also stress the crucial role of healthy marine ecosystems, sustainable fisheries, and sustainable aquaculture for food security and nutrition, and in providing for the livelihoods of millions of people,* the FAO/World Fish Center Fishing for the Future process, the Global Partnership on Oceans GPO, the Post 2015 SDG agenda*.* These works also stress the importance of ensuring access to natural resources and to markets, including for small-scale producers. This is closely related to the realization of human rights, including direct and indirect food security.

Likewise, several countries and Organizations are looking at the contribution of fisheries and aquaculture to Food Security and Blue Growth. These are debated at international fora, including the Asia Conference on Oceans, Food Security and Blue Growth (June 2013, Bali, Indonesia), The Global Oceans Action Summit for Food Security and Blue Growth (February 2014, The Hague, Netherlands), the Blue Economy Summit (Abu Dhabi, 20 January 2014) and the Post-2015 Sustainable Development Goals (SDG) process. It has also become key in the development strategies of international organizations such as OECD, UNEP, the World Bank, UNIDO, FAO, the Global Green Growth Institute GGGI, the European Union and many nations, developed and developing, including SIDS. Consequently, the HLPE should analyse the linkages between sustainable management and conservation of aquatic resources, food security and Blue Growth.

There is a need to provide more discipline and coherence across the various sections of the report so that it is more apparent that it is clearly answering the key question of the study‑ namely, “...what should be done to maintain or even enhance this contribution now and in the long term, given the challenges that both fisheries and aquaculture sectors are facing in terms of their own environmental sustainability and governance, and the external economic and demographic transitions...” to which they have to respond.

In particular, it would be useful if the specific interrogations ( page 3) were aligned along the lines of the four dimensions of food security and nutrition of availability, accessibility, Stability, and utilization. The reader would then be able to see the clear linkages and understand the message that the paper is trying to make.

1. Specific comments

2.1 Fish, food and nutritional value

Firstly, most issues are covered but the structure and language could be improved to make it more clear more readable and understandable. It reflects very much the excellent work done by World Fish!

the main challenges related to malnutrition should be offered some space; e.g. deficiencies of vitamin A, iron, iodine, zinc, etc. This could then be linked to how fish products could play a particular role.

The focus on small fish species as a very good source of micronutrients is great. However, the unique role they can play is not necessarily because they are small, but due to the fact that in this case the most nutritious part of the fish are eaten (head, bones, liver, etc.) and no thrown away. These nutrient dense part from bigger fish species can also be consumed if processed properly. Improved use of fish by-products has a great potential in this aspect, by-products represent in many cases more than 50% of fish being processed.

The HLPE should consider the draft paper on fish in nutrition prepared for the ICN2 and accessible online. It includes useful information and would enable the HLPE to align if deemed necessary with the views expressed at ICN2.The paper prepared for COFI:AQ on the role of aquaculture in nutrition could also give some useful inputs.

The part on by-catch is too narrow! The reference Watling and Norse, 1998 is an extreme environmental view written for media not for the scientific world.

Page 15.L16: Although fish oil contain some omega-6 oils, these oils are abundant in vegetable oils, not deficient in most diets; the problem is rather too much omega-6 in diets. Species like farmed pangasius are often claimed to be unhealthy because of the high level of omega-6 oils. The same arguments are used against farmed salmon.

L19: Levels of PUFAs in carps are much lower than in e.g. sardines and anchovies, but one meal of most carps will in most cases cover enough EPA+DHA for several days! The total contribution of omega-3s from carps are more than the total contribution of omega-3s from salmon due to the high volumes of carps produced (about 28 million tonnes per year).

Page 16.L24-27: Fish is in particular important as a source of essential micronutrients and fats (long chain omega-3s).

Page 17.L17: What is "high value chain processing"?

L26-28: Unclear.

Page 18. L17: Should be: ......in the human brain and neural system.

2.2. Fisheries sustainability

Resource and environmental sustainability (Section 3.4). The document seems shying away from the fact that resource and environmental sustainability is the prerequisite for food security and that rebuilding the current overfished stocks can increase production by 16.5 million t, or 21% of the current marine fish landings[[1]](#footnote-1). This is a great boost to food security and nutrition and should be emphasized.

P27, L4-7. The text says, “Production losses from unsustainable over-exploitation were one cause of the estimated loss of $50 billion from capture. On the surface, the environmental sustainability of both fisheries and aquaculture is recognized to be a sine qua none condition for FSN”. In fact, the economic loss is also caused by reasons other than the decreasing production and has a week indication on the loss of food supply and then on FSN. The link between resource sustainability and FSN is not “on the surface”, but fundamental and obvious.

**P28.** R6-13: the important role of fish and fishery products to FSN in a large number of countries and/or in specific locations with limited access to other sources of (animal) protein should be mentioned here (data can be obtained from FAO Food Balance Sheets for fisheries). R14: it is not clear from the following text what the ‘changing modes’ in the title refer to. Capture fisheries and aquaculture production technology? If so, this would need to be better reflected. R19: There should be a reference to the linkages between fisheries and aquaculture. As it reads now, aquaculture seems to be the compensation for stable/declining capture fisheries - but it needs to be spelled out that there is an impact of aquaculture on capture fisheries and its contribution to FSN through the production of fish oil/meal as aquaculture feed, the collection of wild seeds etc.

R34 and following: another factor that may affect the geography of capture fisheries, in particular in the long run, is climate change. This should be mentioned here.

Fisheries crisis (P29). “ They are biological debates, relying on biological fish assessment methods and framed primarily around assumptions of maximizing the economic value of the fisheries stocks, such as by favoring fish of larger sizes and of higher value species. As a generalization, fish for FSN tend to be smaller and of lower value”. This description is not quite right, and a bit misleading. The so-called crisis often refers to overexploitation of fish stock. Overexploitation reduces the productivity of fish resources and has a negative impact on FSN. As FSN is concerned, it is about the total production of the stock, rather than small or big fish. It seems incorrect to say “fish for FSN tend to be smaller and of lower value” as what maters here is volume of food supply.

It is also worth noting that almost all the studies referenced in Table 3.4 are biological, not using assumptions of maximizing economic value as the document claimed.

A couple of things mentioned in Table3.4 also require clarification: i) “ 90% of large, predatory fish have gone” should be “90% reduction in the biomass of large predatory fish” to avoid the impression that 90% of species are gone.ii) “Appropriate analyses of data-poor fisheries shows that the patterns of resource status are similar to those for more data-rich fisheries”. The method used for this analysis has its own limits, for example using the assessed stocks to tune the model. So, it is biased to say “ appropriate analyses”. Costello et al’s (2012) conclusion is in contrast with Thornsom et al’s (2011) that data poor fisheries are in better situation than data-rich stocks.

Box 3.2. The purpose of stock assessment is to assess the potential biological productivity and the responses of a fish stock to fishing so that fisheries managers can use the information to design regulatory measures to meet the objectives of the fishery. Things mentioned in Box 3.2 such as economic revenues, livelihood, FSN, equitable distribution of resources, value added processing can also be addressed in secondary analyses based on stock assessment outputs, although it is true in many fisheries such analyses have not been carried out as they should.

Other specific comments

P12, L17-20. “90% of 120 m ... fishermen … drive livelihood from the small-scale sector…contribute 70% of the total world catch” is inconsistent with “half of fish catches at global level originate from small-scale fisheries” (P33, L17).

P3, L9-10. “ The number of people employed in global aquaculture would be close to 11.89 million …in these selected case studies only”. FAO should have official statistics available on this.

P23, L3-10. The authors should use FAO official figures on fish used for direct human consumption or non-direct food use.

P31, L4-6. “Much remains to be done … in terms of FSN rather than standard management objective such as maximum sustainable and maximum economic yield.” In general, FSN is consistent with maximum sustainable yield as a higher fish production can increase market supply and then improve FSN. But, maximum economic yield is different.

P39, L15-17. It reads that can we secure or improve the food security and nutrition of one group without compromising the food security of the other? The food security issue should be looked and addressed at the society level, rather than at the group level.

P39, L22-23. The remark, “trade tends to move fish away from poor people”, is incomplete and should be completed by adding to it “in turn for cash”. The cash earned shall empower fishermen to buy their needs and improve their livelihoods and FSN.

P42, L2-6. The structural failure of the fish export sector and national institutions to ensure an effective distribution of the fish trade revenues is not a fishery issue, but one of the wider society. From this failure, if you conclude that fish trade has negative impacts, you miss the point.

P44, Box 3.5. The box emphasizes the importance of an Africa-to-Africa trade. Fine, but how can an Africa-to-Africa trade increase supply to the whole Africa and meet its need of 27% increase in fish in 2020?

P45, L11-15. It reads that the bulk of these small-scale, unorganised, and unskilled African producers and traders are excluded from the high value fish trade activities promoted by the current trade model, as they are unable to comply with the food quality- standards requirements imposed by international trade institutions (e.g. WTO) and the importing countries. Because of this to ask small-scale fisheries to give up trading opportunities does not seem the right strategy. Instead, focus should be on how to organize SSF fishermen to increase their negotiation power.

P49, L28. The term of forage fish should be avoided, as technically any species is forage for other species at a certain stage.

P52, L19. It says “FAO has also for many years contributed to this biased agenda”. The right expression should be “FAO has not acted actively to correct this biased agenda”, as contributing to something means your action leads to the happening of something, but without acting to stop something from happening does not mean contributing.

P53, L11. “suggest than” should be “suggest that”.

P56, L21-24. Banning trawlers in inshore waters certainly has consideration of protecting small-scale fisheries, but another reason is for ecological concerns as the inshore waters are often the nursery ground for many fish species.

P56, Box 3.9. The contents in this box are not well balanced. First, SSF and large scale fisheries have developed with its own reasons. They target different stocks or fish in different areas. SSF cannot really fully replace LSF in terms of both resource use and fishing operation. Second, SSF also needs regulation and can definitely cause overfishing as well.

P57, L8-39. It is not true “today’s discards are really fish of the future. This is loss of future food security for all.” Some species cannot be used for food either today or in the future.

P69**.** R16: Add reference to the forthcoming Voluntary Guidelines for Securing Sustainable Small-scale Fisheries in the Context of Food Security and Poverty Eradication. R17: It would be important here to stress the principles of the human rights based approach a bit more. This could be nicely illustrated by the case of South Africa, were small-scale fishers secured access rights based on a claim for their right to food. See P. 27; www.fao.org/docrep/016/ap553e/ap553e.pdf

P73, L9-23. Economic efficiency as a fishery management objective is not a majority today. Cutting the number of fishermen is against the poverty alleviation and FSN for the poor you talked a lot in previous sectors.

P74, L22-26. “70% of what SSF catch in developing countries in actually unreported and unregulated” is not true. What did you get the figure? Basically, you are saying SSF is essentially IUU fishing. I think you get it wrong.

P.75. R7: In 2011COFI approved the development of a new international instrument in the form of Guidelines on small-scale fisheries that would draw on relevant existing instruments, complementing the Code. FAO has facilitated the development of these Voluntary Guidelines for Securing Sustainable Small-scale Fisheries in the Context of Food Security and Poverty Eradication (SSF Guidelines), taking a highly....The SSF Guidelines are expected to be endorsed by COFI in June 2014.

P.77. R18: This recommendation should not be limited to the development of these instruments but rather look at the *implementation* of existing ones, including related instruments like the VG Tenure and the Right to Food GuidelinesP78, L16-19. I do not agree with you that conventionally, assessments stress improving the yields of high value species, and generally large fish, often treating fish species… high value fish”. Conventional stock assessment often focuses on single species and is not able to compare large fish with small ones.

P. 81. R40: Appropriate measures to prevent any damage from escapes etc. on natural stocks need to accompany this.

2.3 Aquaculture

page 31- line 8: alternative proposed para: Environmentally sustainable aquaculture production depends on the right combination of farming systems (including health management), resource use (e.g. land water, energy) appropriate inputs (feeds, seeds, labour, infrastructure) and management of outputs (escapes, diseases etc.) (see the ecosystem approach to aquaculture guidelines, FAO (2009) ().

p. 31 – line 13: eliminate "body", since it could running water, ground water etc.

p. 31 – line 35: you mean in terms of trade-off? compared with other food sectors?

p. 32 – line 33: this comment is really out of place, unless the role of other organisms is mentioned e.g. FAO has made a very explicit commitment as well

p. 46 – lines 23-37: It is worth mentioning that this practice is despairing with the raise of larvae produced in hatcheries. Now a days in Nicaragua even small farmers are buying the larvae

p. 51 – line 7: even large scale aquaculture can provide food security if provides jobs!! this is particularly the case through the provision of employment for women in the processing part. Many women in Chile and in Nicaragua are employed by the salmon and shrimp industry and they have increased access to food security for their families, an opportunity they did not have previously

P. 51 – line 32: Delgado P 75 - line 35: should also notice the need for more integrated strategies for implementation of sustainable aquaculture giving due consideration to equity aspects. See the FAO EAA guidelines.

<http://www.fao.org/docrep/013/i1750e/i1750e00.htm>

p. 81 – line 17: here we are missing the need to strengthen equity aspects in aquaculture as business, greater share of benefit with workers and processors. This will ensure greater food security through employment and access to food

2.4. Trade

Overall, the international trade aspects of this report are weak, with ad hoc evidence, usually one-sided. This report ignores the fact that fish trade does not take place within a vacuum, that other issues affect the poverty and nutrition of fishers and small scale aquaculture producers and their potential returns from international trade. Namely, there are a myriad of obstacles unrelated to fish trade that perhaps influence the trade patterns from local markets to international markets, such as weak transportation infrastructure to reach domestic and regional markets, political conflicts that prevent intra-regional trade, high customs duties and tariffs between developing countries which discourage intra-regional trade flows, border corruption, cross-border illegal trade that is already occurring but does not show in statistics (such as in Africa) or unreported trade (quite common in Asia), general lack of price and market data at local level in developing countries, ineffective government policies and fisheries management, lack of enforcement, etc. Most importantly, lack of policies that ensure equitable distribution of the benefits of trade along the value chain in some developing countries often leads to fishers and fishing communities getting the least benefits and unable to lift themselves out poverty.

The HLPE should review so many blanket statements and generalizations about international fish trade which are counter-intuitive and are not supported by data.

Page 25, lines1-3 and 5-6. The question is: would fisher households be “poorer” if they didn’t sell part of their catch? Economists look at evidence from the marketplace, i.e. small scale fishers worldwide sell all or part of their catch in local, regional and global markets. This is a visible fact. If selling fish was a less welfare-enhancing decision than eating the fish, then one wouldn’t observe this common market behaviour. The evidence may point to the problem of a general lack of education about nutritionally balanced diets and the nutritional requirements of growing children. Lack of education in poor communities contributes to malnutrition and poverty, not necessarily the selling of fish.

Page 25, lines 17 & 18. The fact that small scale fishers worldwide sell part or all of their catch, as opposed to consuming it, is clear market evidence (and common sense) that the former is a superior economic choice than the latter, and thus improves household welfare. If trading fish makes a family poorer and hungrier, they simply would not trade.

Page 26, 13-16. Income to each small scale fisher and aquaculture producer added together contributes to *“national income”,* by definition. National income does not belong to the government. Where is the evidence that income to individuals does not contribute to their food security and nutrition?

Page 39, lines 12-17. This is truly a complicated issue for policymakers and is well-known in the agricultural development literature. The flipside of the authors’ argument is whether food subsidies and food aid hurt producers. Namely, that if food producers do not receive sufficient prices to cover costs, they are forced out of production and into less productive work and deeper poverty. This is true for both farmers and fishers in developing countries which receive international food aid and/or government subsidies to support urban consumers. This is the vicious cycle, as food aid and subsidized food prices benefit urban consumers but reduce long term productivity of domestic farmers and fishers, further reducing domestic food supplies and putting upward pressure on food prices in the future.

International fish trade and food security (P39). On the one side, it claims that international trading is good for poverty alleviation and food security, but on the other, it contends that there are many negative impacts on food security and livelihood options for the poor by taking away fish from the local populations. The report seems mixing major consequences with side effects caused by governance failure. The typical example is the Nile perch Lake Victoria fishery. From a revenue perspective, it is a success, but from the perspective of food security of local population is a failure. In this case, the increased revenue has not turned into poverty alleviation and increased food security. This is caused by the failure of government, not a failure of trade. Without a proper functioning of other relevant sectors of the society, any other effort may also fail. It is worth mentioning that the study is not scientifically convincing and sound. The fact that Ugandan and Tanzanian districts located on the shores of the lake were systematically displaying higher rates of stunted and wasted children may be caused by other reasons that were not examined in the study. Caution needs to be exercise when drawing such superficial link based on phenomena without examining its root cause. The fishing agreements signed between developed and developing countries are quite different from fish trade. It may not be appropriate to discuss it here.

Pages 39-45 International fish trade and food security. The authors refer to the NORAD study entitled “*Fish trade for the people” (2004*). A more recent NORAD-funded project “A value-chain analysis of international fish trade and food security with an impact assessment of the small scale sector” (August 2012) reports on the impact of international fish trade and value chains on small scale fishers in 15 country case studies. The results of this more recent NORAD project should be incorporated into the HLPE report.

Page 40, Lines 37-39. Authors should include the results of the more recent NORAD fisheries value-chain analysis (2012). It could also be useful to compare the food security situation of small scale fishers and aquaculture producers providing a cash crop to the international market with the food security and poverty situation of other cash crop farmers in developing countries, such as cocoa and coffee producers.

Page 42, Lines 8-17. It would be less-biased to also mention the role of resource governance and lack of sustainable policies in many developing country fisheries, compared to management of fisheries resources in developed countries. Examining fish trade in isolation is not showing the complete picture, as international trade cannot be the sole cause of poverty, food insecurity and unsustainable resource use in developing countries.

Page 42, lines 20-21. The statement *“fish processing factories (often owned by companies in importing countries or multinational corporations)”* needs to be justified with verifiable statistics, such as which regions, per cent of processing sectors are foreign owned, etc. In addition, it is important to look at the positive aspects foreign investment has had in several countries that are now emerging economies with healthy economic growth and poverty reduction records.

Page 42, lines 36-37. The statement “*This alternative is to re-orientate fish trade toward regional or domestic markets”,* implies that global market integration excludes local and regional markets. This is not the case in developing countries. The availability of local and regional markets typically depends on the fish consumption habits of the population. For example, in some regions of Africa, Latin America and in Eastern Europe, per capita fish consumption is very low and there is not much demand for fish. Therefore, international markets offer an additional source of employment and income from underutilized inland fisheries. On the other hand, for coastal communities in Africa and in Asia, there is high per capita demand for fish. Thus local and regional trade are already actively pursued.

The HLPE study needs to have more geographical sensitivity as fish consumption habits and trade are not homogenous around the world (i.e. Box 3.4 is a good example, however the statements and conclusions within the text of the document generalize too much).

Page 43, lines 20-21. The NORAD value chain study (2012) has good examples of local and regional trade within fisheries value chains and recommendations for increasing the role of regional markets.

Page 43, lines 34-41. Suggesting that developing country small scale fisheries move away from international trade to regional and domestic markets is a strong generalization and is not correct. It is not a competition between local, regional and international markets. The fishers should have the opportunity to sell their fish in the market that brings them the most secure income source, and thus improved food security. The role of FAO is to assist developing country and small scale producers to overcome the obstacles mentioned by the authors (HACCP, eco-labels), rather than advise them to just stop trading with developed countries.

Page 44, lines 3-4, and 8-9. I do not see how “*trade of high value fish exported to rich countries’ markets... indirectly*” reduces *“management support and donors’ money away from the small-scale fisheries and aquaculture producers and traders*” Evidence of this needs to be clearly demonstrated.

Page 44, Box 3.5. This box trivializes the very real issues of African infrastructure and lack of transport grid, which would directly affect the ability of African small-scale fishers to move fish (a perishable product) within Africa. The consumption patterns of fish within the African continent also vary considerably across countries and between coastal and inland regions. Box 3.5 contributes misleading one-sided information and should include, at least, other challenges facing the transport of perishable food products within Africa. Even international aid shipments needed during emergencies have faced critical transport problems, often sitting at harbours along the coast and never reaching the target populations due to poor transportation infrastructure or lack of security due to civil wars.

Box 3.5 ends by blaming the current trade model for excluding small scale African fishers from entering the international markets, namely due to the *“food quality standards requirements imposed by international trade institutions (e.g. WTO) and the importing countries”.* The statement by itself is wrong. The HLPE should consult the EU DG Sanco website to see how many small scale operators from developing countries currently meet EU safety and quality requirements. It is however true that small scale fishers have more difficulties facing these challenges, but these are not the only challenges. And there is no mention of the opportunities international markets offer, for example encouraging developing countries to improve their food safety systems to assist fishers to reach standards of international markets, while improving health and hygiene for their own people.

2.5 Gender

Overall, the section is well written, balanced and factual. However, it would be useful if the 5 priority facets linking gender and FSN could be arranged in terms of the four dimensions of food security and nutrition of availability, accessibility, Stability, and Utilization, particularly in section 4.3 Summing up. This has been done to some extent, but greater emphasis on these would help the reader’s focus and reinforce the message that fish are critical for FSN.

2.6. Governance

Overall, the section is weak on providing facts about the fundamental links between governance and FSN. Many of the opening points are not incorrect but would benefit from being presented in a neutral manner free from the overwhelming implicit bias that big is bad and small is great.

Section 5.1 doesn’t address why governance is key to food security.

Section 5.2 – The sections do not flow. It would make sense to start with governance at the international level, including the Code of Conduct for Responsible Fisheries, and then later move to a short, concise section on governance options and issues, including co-management.

P 69 lines 6-18 is missing key instruments such as the Right to Food Guidelines, the Voluntary Guidelines on the Governance of Tenure..., and fails to mention the Voluntary Guidelines on Securing Small-scale Fisheries currently under development. Moreover, it is unclear as to why this is in the section on “Why is governance key to food Security?“ and not found in 5.3 subsection “Fisheries governance at the international level”.

The section is comprised of an extensive dialog regarding co-management instead of all forms of governance.

P74. Para 2 and 3. These two paragraphs seem to be letting small scale fisheries “off the hook” – although there is acknowledgement that operations / catches of small scale fisheries are largely unreported, the article suggests that small scale fisheries are not involved in illegal fishing, or, if so, it is justified! All three issues – illegal, unreported, unregulated fishing – are present in small scale fisheries around the globe and should be addressed appropriately. Nevertheless, the approach to combating IUU fishing in industrial and small scale fisheries should be different, with the latter benefitting more from capacity development programmes and stakeholder involvement in developing national / sub-regional sustainable fisheries management plans which lead to enhanced food security. In parallel, one must also highlight the fact that small scale fisheries are particularly vulnerable to the effects of IUU fishing by large scale / industrial vessels.

Contrary to what is suggested in the text, the IPOA-IUU clearly includes small scale fisheries (or at least, does not omit them) and explicitly distinguishes and defines the three IUU fishing components. The recently adopted international guidelines for flag State performance (which are not mentioned in the document), the objective of which is to prevent, deter and eliminate IUU fishing, also encompass small scale fisheries. The international guidelines on small scale fisheries, under formulation and discussion, will underpin certain aspects of such fisheries in accordance with the instruments mentioned above.

p. 75 The 34 lines in the section that are actually under the title “Governance issue[S] in aquaculture and links to food security” would benefit from the existence of a complementary section about governance, capture fisheries, and FSN.

P 75 It is unclear as to what is meant in lines 27-30.

Section *5.4 Summary of key governance points* offers neither a summary of the discussion. And, although it mentions the issue of tenure in aquaculture, it did not discuss that in the section on aquaculture. It is entirely silent on the issue of the governance of tenure in capture fisheries, something that is essential if the small scale sector is going to be able to realize and defend its rights.

Again, as mentioned above, looking at the governance of capture fisheries and aquaculture through the lens of the four dimensions of food security and nutrition of availability, accessibility, Stability, and Utilization – may help to organize the points of this section and provide a more structured discussion.

1. Ye et al. (2013) Rebuilding global fisheries: the World Summit Goal, costs and benefits. Fish and Fisheries, 14:164-185. [↑](#footnote-ref-1)