

AN OPEN LETTER TO THE GENERAL STEERING COMMITTEE OF THE WWF SHRIMP AQUACULTURE DIALOGUE

April 24, 2012

Dear ShAD/GSC members,

After careful and considered reflection on the draft standards and the whole WWF-ShAD (Shrimp Aquaculture Dialogue) process, we the undersigned Conscientious Objectors -- NGOs working with local communities in the shrimp producer-nations and consumers in the shrimp-importing nations -- have unanimously decided that we cannot support the ShAD General Steering Committee (ShAD/GSC) and the Aquaculture Stewardship Council's (ASC) intentions or actions towards establishing standards for shrimp aquaculture certification. Many others who have added their names and organizational affiliations to our list have also joined us in our protest.

We must therefore continue our course to speak out publicly and campaign against the intent and the process that WWF-ShAD has endeavoured to undertake. The historical record and scientific evidence both indicate that certification will do much harm to both Local Resource Users and the coastal marine environment. The following reasons stand out among many others as indicators that we COs must continue to strongly oppose the ShAD process and the intended ASC and organize a wider resistance against ShAD and other shrimp certification schemes in both Europe and the USA:

 There has never been involvement nor representation in WWF-ShAD's socalled dialogue process for the majority of stakeholders or, more aptly, the Local Resource Users who are adversely affected by the shrimp industry in producer nations. ShAD's "stakeholders" are overwhelmingly those invested in the growth of the shrimp-export industry.

- 2. With each revision to the draft, the standards and their evaluation criteria have been progressively and deliberately diluted by the GSC to ensure that at least 20% of the existing shrimp industry can be certified immediately after the Standards are released. The process clearly demonstrates the bias of the ShAD/GSC.
- 3. The ShAD/GSC has resolutely refrained from undertaking or commissioning serious research to collect meaningful and verifiable inputs and feedback from Local Resource Users in the manner prescribed by The Economics of Ecosystems and Biodiversity (TEEB).
- 4. The GSC process for selecting its board members has not been fair from the beginning and is not representative of a transparent and democratic process. As such, the standards overwhelmingly represent industry interests -- for example: the whole of Africa is "represented" on the ShAD/GSC by shrimp industry nominees from Madagascar.
- 5. Continued lack of proper legislation and enforcement in producernations makes adherence to any certification standard unfeasible.
- 6. ShAD puts too much trust in the industry to monitor and regulate itself. The certification programme depends upon an untried and untested auditing system. Other critical aspects of the process too require a "leap of faith" -- that previously disastrous practices will miraculously reverse their effects once the ShAD standards are released.
- 7. The ShAD standards continue to perpetuate unsustainable and destructive open-throughput systems of aquaculture -- with a legacy of 400,000 hectares (and counting) of abandoned ponds in producer-nations. The standards also promote bad practices relating to so-called "mitigation of the effects of mangrove loss".
- 8. The process conveniently ignores wide-spread community displacement, human rights violations and environmental damage to many thousands of hectares of land by the shrimp industry prior to 1999. Under the present standards, ponds in these regions could be certified. Trends indicate that they will. The ASC becomes, therefore, a confessional for the shrimp industry and will grant indulgences in the form of certification.
- 9. Export-oriented tropical shrimp production does not contribute towards food security. Food security should not be measured by the weight of export-production or the profit-curve of the industry, but instead by the availability of healthy and sustainable means of local food production for local consumption.
- 10. There remains the great risk that WWF-ShAD certification, by placing a green stamp on tropical shrimp, will actually expand the demand for farmed tropical shrimp -- both certified and uncertified -- thus promoting the continued (and possibly more rapid) expansion of unsustainable practices.
- 11. Feed issues are still not satisfactorily resolved and there is still no effective plan to meet increasing feed demands. The projected reliance on GM soy and palm oil is of great concern.
- 12. The COs had requested a breakdown of development time spent by ShAD in developing their social, environment and technical standards. We have not received this, yet.

13. ShAD/GSC and their offspring in the ASC have still not taken any direct and effective actions to influence consumers in the importing nations to reduce shrimp consumption -- extremely pertinent to the intent and purposes to any attempt at designing a certification program for shrimp.

We reiterate our demands that shrimp farming should not be located within the inter-tidal zone; it should not be allowed to affect productive agricultural lands, or displace members of local communities.

The final draft standards represent an extremely crude attempt at setting up "standards". The process demonstrates a lack of careful thought and consideration of ground realities and concern for Local Resource Users -- people who will suffer the consequences of WWF-ShAD's actions.

The GSC's position that the standards will be released regardless of their merit and consequences leaves little scope for further dialogue.

As such, we the undersigned Conscientious Objectors reject the WWF-ShAD process and its shrimp aquaculture standards.

We reaffirm our support, as always,

For the mangroves and mangrove communities,

The Conscientious Objectors

Signed by:

ORGANISATIONS

- 1. Pisit Charnsnoh, Yadfon Association, Thailand
- 2. Khushi Kabir, Nijera Kori, Bangladesh
- 3. Riza Damanik, KIARA (Fisheries Justice Coalition), Indonesia
- 4. Alfredo Quarto, Mangrove Action Project
- 5. Maurizio Farhan Ferrari, Forest Peoples Programme, UK
- 6. Natasha Ahmad, ASIA Solidarity against Industrial Aquaculture, India
- 7. Gudrun Hubendick, Stockholm Society for Nature Conservation, Sweden
- 8. Don Staniford, Global Alliance against Industrial Aquaculture
- 9. Maria Delgado, ECOTERRA Intl.
- 10. Marieke Mutsaers, Trichilia ABC, Netherlands
- 11. Stanislav Lhota, Univ. of South Bohemia & Usti nad Labem Zoo, Czech Republic
- 12. Darlene Schanfald, Olympic Environmental Council, Sequim, Washington
- 13. Paula Palmer, Director Global Response Program/Cultural Survival, Inc., USA
- 14. Diane Wilson, Calhoun County Resource Watch, USA
- 15. Dr. Wolfram Heise, The JAF Foundation, Switzerland
- 16. Foundation for Deep Ecology, USA
- 17. The Conservation Land Trust, USA, Argentina, Chile
- 18. Conservacion Patagonica, USA, Argentina
- 19. Fundacion Pumalin, USA, Chile
- 20. Joanna Levitt, International Accountability Project, USA
- 21. Gabriella Zanzanaini, Food & Water, Europe
- 22. Wenonah Hauter, Executive Director, Food & Water Watch, USA
- 23. Nina Holland, Corporate Europe Observatory, Belgium
- 24. DeeVon Quirolo, Co-Founder of Reef Relief, USA
- 25. Guadalupe Rodriguez, Salva la Selva, Spain
- 26. Klaus Schenck, Rettet den Regenwald, Germany
- 27. Béatrice Gorez, CFFA CAPE, Belgium
- 28. Anne Petermann, Global Justice Ecology Project, USA
- 29. Mary Bricker-Jenkins, USA-Canada Alliance of Inhabitants (USACAI), USA

- 30. Robert Jereski, New York Climate Action Group, USA
- 31. Tim Keating, Rainforest Relief, USA
- 32. Sylvie Cardona, d'AVES, France
- 33. Herman Klosius, Informationsgruppe Lateinamerika IGLA, Austria
- 34. Nian Dorry, Northwest Atlantic Marine Alliance, USA
- 35. Dan Silver, Endangered Habitats League, USA
- 36. Redmanglar Internacional, Latin America
- 37. Jorge Varela, CODDEFFAGOLF, Honduras
- 38. Henderson Colina, AEPA FALCON NGO, Venezuela
- 39. Alianza por los manglares, Litorales, Aguas y Suelos ALMAS REDMANGLAR, Venezuela
- 40. La Ventana AC de Mexico, Mexico
- 41. Juan Carlos Cardenas, Centro Ecoceanos, Chile
- 42. Teresa Perez, World Rainforest Movement, Uruguay
- 43. Nemesio Juan Rodríguez Mitchell, PUMC-UNAM sede Oaxaca, México
- 44. René Schärer, Instituto Terramar, Brazil
- 45. Manuela Díaz Ballesteros, Asociación de Pescadores, Campesinos, afro descendientes e Indígenas para el Desarrollo Comunitario de la Ciénaga Grande del Bajo Sinú, ASPROCIG, Colombia
- 46. Fundación Urundei, Salta, Argentina
- 47. Rezwana Hasan, Bangaldesh Environmental Lawyers' Association, Bangladesh
- 48. Hasan Mehedi, Humanitywatch, Bangladesh
- 49. Shamsul Huda, Association for Land Reform and Development (ALRD), Bangladesh
- 50. Meghnaguha Thakurata, Research Initiatives Bangladesh (RIB), Bangladesh
- 51. Philip Gain, Society for Environment and Human Development (SEHD), Bangladesh
- 52. Khorshed Alam, Alternative Movement for Resources and Freedom Society, Bangladesh
- 53. Anti-Debt Coalition (KAU), Indonesia
- 54. Black Tiger Shrimp Farmers' Union (P3UW), Indonesia
- 55. Institute of Global Justice (IGJ), Indonesia
- 56. Berry Nahdian Furqon, Indonesia
- 57. Ruddy Gustave, KONPHALINDO, Indonesia
- 58. Muhammad Reza, Serikat Nelayan Indonesia / Indonesia Fisherfolk Union, Indonesia
- 59. Nurhidayat Moenir, Jaringan Kerja Pemetaan Partisipatif (JKPP), Indonesia
- 60. Geetha Lakmini, Food Sovereignty Network, Sri Lanka
- 61. Herman Kumara, National Fisheries Solidarity Movement, Sri Lanka
- 62. Shamith Roshan, Youth in Action (YinA), Sri Lanka
- 63. Thomas Kocherry, National Fishworkers' Forum (NFF), India
- 64. Bijaya Kumar Kabi, Action for Protection of Wild Animals (APOWA), India
- 65. Kunal Deb, Uthnau, India.
- 66. Samir Acharya, Society for Andaman and Nicobar Ecology, Port Blair, India
- 67. Javier M. Claparols, Ecological Society of the Philippines, IUCN-CEESP, Philippines
- 68. S.M. Mohamed Idris, Consumers' Association of Penang, Malaysia
- 69. Meenakshi Raman, Sahabat Alam Malaysia (Friends of the Earth Malaysia), Malaysia
- 70. Chee Yoke Ling, Third World Network, Malaysia
- 71. Akie Hart, Mangrove Forest Conservation Society of Nigeria
- 72. Tekena Opukunachukwu, Grassroots Coalition for Transparency and Good Governance, Nigeria
- 73. Nemi Tammuno, Rural Initiative for Community Empowerment, Nigeria
- 74. Shedrach Philimon, Rural Communities Development Association, Nigeria 75. Parker Lawson, Economic Empowerment and Environmental Protection
- Network, Nigeria
- 76. Ibiwari Hector, Peace and Justice Foundation, Nigeria

- 77. Henry Folawiyor, Child Rights Initiative, Nigeria
- 78. Junior Pepple, Bethaisda Environmental Foundation, Nigeria
- 79. Clifford Opusunju, Positive Change Advocates, Nigeria
- 80. Nenibarini Zabbey, Centre for Environment, Human Rights and Development (CEHRD), Nigeria
- 81. Ekindi Moudingo, Cameroon Wildlife Conservation Society, Cameroon
- 82. Edem Edem, African Mangrove Network, Nigeria
- 83. Wally Menne, Timberwatch Coalition, South Africa
- 84. Rowland Benjamin, Information for Action, Perth, Western Australia
- 85. Edda Kirleis, Evangelischer Entwicklungsdienst EED, Germany
- 86. Ashish Kothari, Kalpavriksh, India
- 87. Abdoulaye Diame, WAAME, Senegal
- 88. Jean-Marie Muanda, ADEV, Congo
- 89. Orijemie Akpo Emuobosa, University of Ibadan, Nigeria
- 90. Lydia Chaparro, Área Marina Ecologistas en Acción, Spain
- 91. Salomon Abresparr, Fältbiologerna Nature and Youth, Sweden
- 92. Centre National de Coopération au Développement, Belgium
- 93. Brian O'Riordan, ICSF Belgium Office
- 94. African Confederation of Artisanal Fishing Organisations (CAOPA)
- 95. Centre National pour la Cooperation au Development (CNCD), Belgium

INDIVIDUALS

- 1. Douglas and Kristine Tompkins, USA
- 2. Wolfgang Gerster, Germany
- 3. Madhusree Mukerjee, Germany
- 4. Marc Robinson, France
- 5. Javier Mateo, Spain
- 6. Yara Schaeffer-Novelli, Brazil
- 7. Khaing Shwe, ME
- 8. Emily Broderick, FL
- 9. Wendy Lee, Jamaica "Certification that is not based on credible data and effective management is meaningless... just a form of greenwashing."
- 10. Htain Lin, Myanmar
- 11. Marc Sommer, Netherlands Antilles
- 12. Alain Olvera Baena, Spain
- 13. Kat Hollomon, United Kingdom
- 14. Pillar Gallego, Spain
- 15. Ann Truyens, Canada
- 16. Gabi Feijo, Brazil
- 17. René Scharer, Brazil
- 18. Marta Rivera, Spain
- 19. William Warren, MA "Analyses of persistent organic pollutants (COPs) should first be performed on sediment, water and shrimp tissues, the results posted on a website to show transparency, and tests be performed by companies that follow EPA standards. Thank you."
- 20. Alex Tagge, CA
- 21. Shannon Alexander, FL
- 22. Jess Jordan, MA
- 23. Jacques Mermoud, New Caledonia
- 24. Elin Andersson, Sweden
- 25. Dan Silver, CA
- 26. Jonathan Spinac, NY
- 27. Piyashi Debroy, India
- 28. Jean-Marie Muanda, Democratic Republic of Congo
- 29. Peter Zdrojewski, OH
- 30. Beckline Mukete, Netherlands
- 31. Kakolee Banerjee, India
- 32. Prarthi Shah, India
- 33. Karin Wijnand, Netherlands
- 34. Noor Alam, Bangladesh "I hate saline shirimp culture."
- 35. Bev Brewis, Canada

36. Zebedee Feka, Cameroon 37. Celeste Botha, WA 38. Ewa Piasecka, Poland 39. James Mulcare, WA 40. Bettina Lorenz, Germany 41. Natasa Legen, Croatia 42. Eternal Gardener, Australia "Do your homework WWF: greenwashing is ECOCIDE! Walk the talk!" 43. Allan Yorkowitz, NJ 44. May Howie, United Kingdom 45. Anette Stauske, Germany 46. Agnieszka Tyszkiewicz, Lithuania 47. Rebecca Brandon, Australia 48. Peter Kralovic, Slovakia 49. Elzbieta Gotkowska, Poland 50. Mary Hebblewhite, GA 51. Steve Klein, Canada 52. Lene Harries, Denmark 53. Mageswari Sangaralingam, Malaysia 54. Mary Truelove, IN 55. Alan Francisco, CA 56. Debora Freriks, Netherlands 57. Thomas Moore, TX
 58. David Lobina, Sweden 59. Theodore Spachidakis, Greece 60. Elizabeth Reynolds, United Kingdom 61. Thomas Gordon, MO
 62. Rachel Martin, United Kingdom 63. Roger Monk, United Kingdom 64. Victoria McFarlane, United Kingdom 65. Danielle Herie, Canada
66. Teresa Wlosowicz, Poland
67. Iwona Krzeminska, Poland
68. Gretchen Craig, NY 69. Julian Lang, CA "Please respect local voices when establishing standards than can impact negatively their local environments as this proposed WWF- ShAD action surely will." 70. Tom Stilwell, NC 71. Hege Torset, Norway 72. Julia Bateman, Ukraine 73. Regina Powell, CA 74. Arthur J, PA 75. Joanna Walczak, Poland 76. Gordana Roljic, Serbia And Montenegro 77. Tonie Wickman, Sweden "Certification is normally a good thing but when it comes to tropical shrimp aquaculture it is different. There is a need to be careful as no systems so far has proven to fulfill standards needed for a certification worth the name. With bad systems being certified all certifications risk to loose confidence, which would spoil possibilities for a sustainable future." 78. Maren Heinig, Australia 79. Anissa Reed, Canada "There is no right way to do the wrong thing!" 80. Elishia Windfohr, CA 81. Margaret Runfors, Sweden 82. Tahoma Khalsa, WA 83. Pocho Alvarez, Ecuador 84. Debbie Williams, WV Juan Manuel Guevara, Ecuador "Un apoyo total, estoy en contra de la 85. tala indiscriminada del manglar que nos afecta a todos, y a las poblaciones usuarias directamente." 86. Sandra Rocha, Portugal 87. Karren Exley, United Kingdom 88. Susan Benway, VT

89. Kendra Richardson, Canada 90. Norm Conrad, WA 91. Bill C, Germany 92. Olga Sokolova, Russian Federation 93. Lynette Zizzo, NY 94. Sami Signorino, IN 95. Vukan Simic, Serbia And Montenegro 96. Alex Tan, Canada 97. Szilvia Molnar, Hungary 98. Mireille Picron, Belgium 99. Carrie Gleason, AZ 100. Monica Gutierrez-Quarto, WA 101. Karen Drissi, Tunisia 102. Harsha Vardhana R, India 103. Lou Baxter, Australia 104. Diane Berings, Belgium 105. Christophe Bazin, France 106. Matjaz Bratus, Slovenia 107. Marina Dobraya, CA 108. Ann Rybalka, Ukraine 109. Vlado Gasperov, Croatia 110. George Theobald, Australia 111. Aletta Kraan, Canada 112. Gudrun Dennis, FL 113. Nicole Weber, MD 114. Cindy Collier, United Kingdom 115. Patricia Myers, NY 116. Rejanne Albuquerque, Brazil 117. Susan M R, Ireland 118. Brenda Collins, United Kingdom 119. Andy Walker, United Kingdom 120. Marta de la Fuente, Spain 121. Hester Low, Singapore 122. Hallie Brotherton, WV 123. Kathleen Basiewicz, NC 124. Amber Caine, GA 125. Patrick Donovan, NY "The world's food supply is too fragile for haphazard and biased rule making." 126. Darini Suthasakul, Thailand 127. Ana Fuentes, Uruguay 128. CJ Johnson, VA 129. Emma Spurgin Hussey, United Kingdom 130. Michael Kirkby, Canada 131. Beatrice de Filippis, Yemen 132. Victoria Molinari, WA 133. Val Rose, CO 134. Isabel Esteve, Spain 135. David Erik Barsati, Sweden 136. Danny Madzhurova, Bulgaria 137. Irina Tikhomirova, Russian Federation 138. HP Garden, United Kingdom 139. Xana Barroso, Portugal 140. Albert Mah, Australia 141. Jana F., South Africa 142. Fran Fulwiler, OR 143. Elena Podgosnik, Russian Federation 144. Per Stenbeck, Sweden 145. Hasmukh Jiwa, India 146. Beth Burrows, USA 147. Yvonne Thiemann, Germany 148. Anne Cook, WA 149. Matthias Bauer, Germany 150. Valentino Martinelli, Germany

151. Michael Skazick, United Kingdom 152. Eva Cardona, Spain 153. Albert Hamann, Germany 154. Thaddäus Bielefeld, Germany 155. Sebastian Lasse, Germany 156. Cecilia Bowerman, Australia 157. Margy Stewart, CA 158. Patricia Matejcek, CA 159. Karilyn Shephard, Trinidad And Tobago 160. Tamara Segrt, Serbia And Montenegro 161. John Schertow, Canada 162. Helen Golding, United Kingdom 163. Gharsallah Mohamed, Saudi Arabia 164. Bruce Sandison, United Kingdom 165. Gabriela Fonseca, Ecuador 166. Valli Sanstrom, WA 167. Carten Meyer, Germany 168. Nicolette Ludolphi, Germany 169. Jean Luc Tortiller, France 170. Marija Popovic, Serbia And Montenegro 171. Kayleigh Rhodes, United Kingdom 172. Lalla Bock, Switzerland 173. Marco Baracca, Italy 174. Kelly Kalinke, Germany 175. Toni Adisano, NY 176. Rik Reynolds, WA "Shrimp farming is destructive to the environment." 177. Katja Relford, Germany 178. Chrissy Henker, Germany 179. Jennifer Curtis, MS 180. Zannah Mustapha, Nigeria 181. Balin Hansen, WA 182. Katherine Garnett, NM 183. Dennis Kaplan, OH 184. Nikos Pastos, AK "Standards for shrimp certification must be inclusive of local shrimp users." 185. Hasmukh Jiwa, India 186. Oumar Balde, Congo 187. David Dow, MA 188. Vivian Newman, ME 189. William Newman, ME 190. Vanditta Diwakar, Fiji 191. Angie Chapman, United Kingdom 192. Kathi Corrigan, NH 193. Cl Ripley, NY 194. Katella Ting, CA 195. A Montgomery, FL 196. Vika Babakova, Ukraine 197. Carolyn Hayton, Australia 198. Serena Wittkopp, OR 199. Michelle Hodges, United Kingdom 200. Cristiano Pinnow, Brazil 201. Amelie Laurent, France 202. Imelda Avendano, TX 203. Sherry Dillon, MD 204. Patti LePage, MO 205. Gabriela Seabra, Portugal 206. Richard Hieber, Germany 207. Marion Laval Jeantet, France 208. Barbara Mindermann, France 209. Catherine Hammond, MD 210. Lee Lockwood, DC 211. Amanda Carter, NY 212. Pamela Kirkham, ON

213. John Taylor, MA 214. Karin Lehnigk, VA 215. Amy E Stroud, TX 216. Danuta Watola, Poland 217. Chris McLaughlin, MA 218. Kathy Parsons, United Kingdom 219. Chantal Buslot, Belgium 220. Maria E Lozano Marin, Spain 221. Francis M Cone, US 222. Gawel Solowski, Poland 223. Ana Gutierrez, Nicaragua 224. Mark M Giese, WI 225. Paul Wilson, WV 226. Agnes Wojciechowska, Poland 227. Dominic Delarmente, Philippines 228. Gawel Solowski, Poland