

OPEN LETTER: GLOBALG.A.P. MUST IMMEDIATELY STOP CERTIFYING EXTINCTION

To the members of the GLOBALG.A.P. Advisory Board

25th July, 2023

Re: The urgent need for FoodPLUS GmbH to revoke GLOBALG.A.P. certification from Macquarie Harbour fish farms

Dear Members of the Board,

We call on you to immediately revoke the GLOBALG.A.P. certification from farmed salmon and ocean trout raised in Macquarie Harbour, Tasmania.

We make this request in light of new scientific evidence that identifies salmon farming in Macquarie Harbour as a key human activity significantly impacting the harbour's environmental health and contributing to the decline of the endangered Maugean skate – a relic from Gondwana that is considered possibly the rarest skate species in the world.

Macquarie Harbour on the west coast of Tasmania has been confirmed to be the last remaining habitat for the endangered Maugean skate. One third of the harbour is located within the boundaries of the Tasmanian Wilderness World Heritage Area; with the Maugean skate listed as one of the World Heritage Area's values.

The endangered Maugean skate also shares its habitat with salmon and ocean trout farms certified by the GLOBALG.A.P. scheme.

A recent Institute of Marine and Antarctic Studies report¹ found the Maugean skate population has rapidly declined by nearly half (47%) from 2014 to 2021. The authors state that decline is likely to have "significant implications" for the population status of the skate, with any further reduction in numbers "increasing their risk of extinction". The Threatened Species Scientific Committee, which advises the federal government on endangered species, has proposed the Maugean skate be prioritized for assessment as "Critically Endangered".²

¹ Moreno and Semmens (2023) *Interim report - Macquarie Harbour Maugean skate population status and monitoring*. IMAS. Available at: https://imas.utas.edu.au/data/assets/pdf_file/0007/1655611/Maugean-skate-2021-interim-report-FINAL.pdf

² Parliament of Australia. Order of 19 June 2023 (255) relating to Maugean skate. Available at: https://www.aph.gov.au/Parliamentary_Business/Tabled_Documents/2606

The report attributes the skate's decline to degraded environmental conditions in the harbour, particularly dissolved oxygen (DO) levels, caused by anthropogenic inputs, namely the expansion of salmon aquaculture industry:

*"The unique hydrology of Macquarie Harbour results in a naturally challenging habitat. While anthropogenic activities since European colonisation have long impacted the harbour, in the past 15 years altered river flows (growing reliance on hydroelectric generation and production demand) and **large-scale development of salmonid aquaculture have resulted in considerable changes to the environment.***

The Maugean skate has been shown to have behavioural and physiological mechanisms that allow it to survive in the challenging conditions of Macquarie Harbour. However, recent changes to the environment (particularly DO levels and mixing dynamics) mean that high impact environmental events have increased in duration, magnitude, and frequency (e.g., duration and severity of low DO periods). Likewise, there is an increased potential for overlap of multiple stressors that may have compounding effects (DO, salinity, temperature)...

*Accordingly, it is apparent that the species is already being pushed beyond their adaptive threshold. This highlights one of the unique challenges of managing micro-endemic, hyper-specialised species, which is that **the viability of the species is intrinsically linked to the health of their restricted habitat.** Therefore, in the case of the Maugean skate, the ongoing impacts to DO levels and mixing dynamics are of extreme concern to the persistence of the species." [emphasis added]*

Alarming, the evidence suggests the Maugean Skate is only one environmental event away from extinction, with IMAS researcher Professor Jayson Semmens stating, "The environmental changes in the harbour have increased the skate's vulnerability to sudden high-impact events, such as water column turn-over driven by westerly winds, which can happen at any moment and potentially decimate the population".³

The findings have prompted scientists to take the unprecedented step of calling for urgent conservation action to save this species from extinction – including taking immediate action on salmon farming activities in the harbour.

³Under Pressure: Scientists call for urgent conservation action to save Maugean skate. IMAS. Available at: <https://www.imas.utas.edu.au/news/news-items/under-pressure-scientists-call-for-urgent-conservation-action-to-save-maugean-skate>

Meanwhile, Huon Aquaculture’s Macquarie Harbour farms are GLOBALG.A.P. certified as being “environmentally responsible” and being sold to unsuspecting shoppers as “sustainably sourced”.

Huon appears to be using their in-house “ethically and sustainably sourced” label on Macquarie Harbour products that are GLOBALG.A.P. certified.⁴ From a consumer perspective, the “sustainably sourced” claim on GLOBALG.A.P. certified Macquarie Harbour salmon and trout can be viewed as entirely misleading.

According to the GLOBALG.A.P. website, the scheme’s vision includes “safe, socially and environmentally responsible farming practices” and “safeguarding our environment”. GLOBALG.A.P. certified Macquarie Harbour farms are failing to meet this vision. Instead, they are associated with waste inputs that have caused low dissolved oxygen, habitat degradation, and contributed to the decline in population of the endangered Maugean skate.

It’s worth noting that the RSPCA farming scheme also certifies Huon Aquaculture products – except those from Macquarie Harbour. Unlike GLOBALG.A.P., the RSPCA Farmed Atlantic Salmon standard⁵ disallows Macquarie Harbour farms due to the “environmental conditions within the harbour”.⁶

Given the new evidence that the rapid decline of the endangered Maugean skate is associated with salmon and trout aquaculture operations in Macquarie Harbour, we contend the certification of Macquarie Harbour farms places the GLOBALG.A.P. scheme’s credibility at risk.

Simply put, greenwashing the extinction of the Maugean skate is not “environmentally responsible”.

We strongly urge the FoodPLUS GmbH to immediately revoke its GLOBALG.A.P. certification from all Macquarie Harbour fish farms.

Sincerely,

Kelly Roebuck
SeaChoice representative, Living Oceans

Jessica Coughlan
Neighbours of Fish Farming

On behalf of the following signatories:

⁴ Huon Premium Ocean Trout Portions. Coles. Available at: <https://www.coles.com.au/product/huon-premium-ocean-trout-portions-skin-on-2pk-3624170>

⁵RSPCA Approved Farming Scheme Standard, Farmed Atlantic Salmon. May 2020. Available at: https://rspcaapproved.org.au/wp-content/uploads/2022/03/2020-05_FARMEDATLANTICSALMON_Standard.pdf

⁶ Australia’s Only RSPCA Approved Salmon. Huon. Available at: <https://www.huonaqua.com.au/australias-only-rspca-approved-salmon/>



Glenys Oogjes, Chief Executive Officer, Animals Australia, Australia



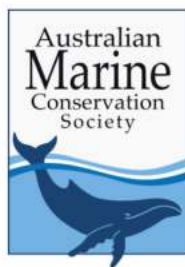
Marcela Ramos, Member, Asamblea de Mujeres Insulares por las Aguas, Chile



Eloise Carr, Director, The Australian Institute Tasmania, Australia



Katrina Love, State Convenor, Animal Justice Party Tasmania, Australia



Darren Kindleysides, CEO, Australian Marine Conservation Society, Australia



Dr. Tarsicio Antezana J, President, Asociación Para la Defensa del Ambiente y la Cultura de Chiloe, Chile



Georgia Hancock, Director and Senior Attorney, Marine Life Program, Animal Welfare Institute, USA



Alistair Allan, Antarctic and Marine Campaigner, Bob Brown Foundation, Australia



Haans Siver, Australian Director, Captain Paul Watson Foundation, Australia

Catherine Collins, Author, Salmon Wars, Canada



Dani Casado, Director, Centinela Patagonia, Chile



**Clayoquot
Action**

**Dan Lewis, Executive Director, Clayoquot Action,
Canada**

**Coastal Communities Network
Scotland**



Conservation Council of New Brunswick
Conseil de conservation *du* Nouveau-Brunswick

**Aquaculture sub-group, Coastal Communities
Network, Scotland**

**Matthew Abbott, Marine Program Director,
Conservation Council of New Brunswick, Canada**



**Kilian Stehfest, Marine Conservation Specialist,
David Suzuki Foundation, Canada**



**Juan Carlos Viveros, Coordinador general de
Defendamos Chiloé, Chile**



**Ulrich Karlowski, Biologist, Director's board,
Deutsche Stiftung Meeresschutz, Germany**

Doug Frantz, Author, Salmon Wars, Canada



**Dr. Julien Armijo, Universidad Bernardo O'Higgins,
Santiago, Chile**

**Simon Ryder-Burbidge, Marine Campaign
Coordinator, Ecology Action Centre, Canada**



Nick Haines, Senior Campaign Manager, Ekō, Global



Peter Carr, Chief Operating Officer, Endangered Species Protection Agency, UK



Rebecca Howarth, Marine Campaigner, Environment Tasmania, Australia



Caroline Rowley, Director, Ethical Farming Ireland, Ireland



Jorge Serendero, CEO, For the Oceans Foundation, Costa Rica



Henry Sharpe, President, Frenchman Bay United, USA



Simon Allston, Chair, Friends of North Bruny Inc, Australia



Antoinette Vermilye, Co founder, Gallifrey Foundation, Switzerland



Lucero Gonzalez Ruiz, Biodiversity Campaigner, Georgia Strait Alliance, Canada



Verena Platt-Till, Project Manager, Gesellschaft zur Rettung der Delphine e.V., Germany



Catalina Cendoya, Coordinator, Global Salmon Farming Resistance, Argentina



Sue Waters, Campaign and Content Consultant, Global Salmon Farming Resistance, Canada



GrassRoots Action Network Tasmania, Australia



Ruben Oddekalv, Leader, Green Warriors of Norway, Norway



Sarah King, Head of Oceans and Plastics Campaign, Greenpeace, Canada



Erica Martin, CEO, Humane Society International, Australia



Jón Kaldal, Icelandic Wildlife Fund, Iceland



Johan Flyvbjerg, Founder, Ingen burfisk i havet, Denmark



Mark J. Palmer, Associate Director, International Marine Mammal Project of Earth Island Institute, USA



Eva Douzinas, Co-founder, Katheti AMKE, Greece



Fay Orfanidou, Co-founder, Director, Katheti AMKE, Greece



Gerard Castles, Killora Community Association, Australia



Karen Wristen, Executive Director, Living Oceans Society, Canada



Dr. Cornelia E. Nauen, President, Mundus maris asbl, Belgium



Mark Sherwood, Executive Director, Native Fish Society, USA



Carly Madge, Policy and Campaign Manager, Ocean Conservation and MPAs, Nature Canada, Canada



Peter George, President, Neighbours of Fish Farms, Australia



Elvar Örn Fridriksson, Program Director, North Atlantic Salmon Fund, Iceland



Cassandra Wright, Treasurer, NWTAS for Clean Oceans INC, Australia



Natalie Parra, Campaign Director, Oceanic Preservation Society, USA



Gloria Hidalgo, Co-founder, Océanos de Vida Libre, Spain



Michael Long, Head of Operations, Parley, USA



Macarena Sanchez, Patagonia, Chile



Brock Callen, Founder, Planet Oceans, USA



Dr. Sandra Altherr, Co-founder, Pro Wildlife, Germany



Crystal Canney, Executive Director, Protect Maine's Fishing Heritage Foundation, USA



Patti Schaefer, Managing Director, Rauch Foundation, USA

Richard Flanagan, Author, Australia



Sandy Stewart, Director, Rob Stewart Sharkwater Foundation, Canada



Dr. Lisa Gershwin, Research Scientist, Salmon Reform Alliance, Australia



John Murphy, Chairperson, Salmon Watch Ireland, Ireland



Jeff Hansen, Managing Director, Sea Shepherd, Australia



Brock Cahill, President and Founder, Sea Change Agency, USA.



Kelly Roebuck, Representative, SeaChoice, Canada



Marie-Celine Piednoir, Associate Director - Partnerships and Communities, SeaLegacy, USA



Brendon Sing, Co-Founder, Shark Guardian, UK



Dr Iris Ziegler, Head International Cooperation, Sharkproject International, Germany



Fernando Reis, Executive Director, Sharks Educational Institute, Portugal



Julia Sorochan, Assistant Director, SkeenaWild Conservation Trust, Canada



Mick Lawrence, President, Surfrider Tasmania, Australia



Dani Casado, Director, Tanana Pictures, Chile



Tasman Peninsula
Marine Protection

**Trish Bailey, Representative, Tasman Peninsula
Marine Protection, Australia**



**Trish Bailey, Vice Chair, Tasmanian Alliance for
Marine Protection, Australia**

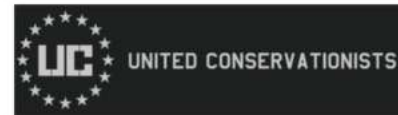


tasmanian
conservation trust inc

**Peter McGlone, CEO, Tasmanian Conservation Trust,
Australia**



**James Kirkpatrick, Chair, Tasmanian Independent
Science Council, Australia**



**Brian Stewart, President, United Conservationist
Inc., USA**



**Benedikta Guðrún Svavarsdóttir, VÁ! félag um vernd
fjarðar, Iceland**



**Stan Proboszcz, Senior Scientist, Watershed Watch
Salmon Society, Canada**



**Emma Helverson, Executive Director, Wild Fish
Conservancy, USA**



**Tom Allen, Campaign Manager, Wilderness Society
Tasmania, Australia**



**Rachel Mulrenan, Scotland Director, WildFish,
Scotland**



**Ben Pearson, Country Director, World Animal
Protection, Australia**