

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

4th May, 2011

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:

1. There has never been involvement nor representation in WWF-ShAD's so-called 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 producer-nations 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:

- Pisit Charnsnoh, Yadfon Association, Thailand
- Khushi Kabir, Nijera Kori, Bangladesh
- Riza Damanik, KIARA (Fisheries Justice Coalition), Indonesia
- Alfredo Quarto, Mangrove Action Project
- Maurizio Farhan Ferrari, Forest Peoples Programme, UK
- Natasha Ahmad, ASIA Solidarity against Industrial Aquaculture, India
- Gudrun Hubendick, Stockholm Society for Nature Conservation, Sweden

- Don Staniford, Global Alliance against Industrial Aquaculture
- Maria Delgado, ECOTERRA Intl.
- Marieke Mutsaers, Trichilia ABC, Netherlands
- Stanislav Lhota, Univ. of South Bohemia & Usti nad Labem Zoo, Czech Republic
- Darlene Schanfald, Olympic Environmental Council, Sequim, Washington
- Paula Palmer, Director Global Response Program/Cultural Survival, Inc., USA
- Diane Wilson, Calhoun County Resource Watch, USA
- Dr. Wolfram Heise, The JAF Foundation, Switzerland
- Foundation for Deep Ecology, USA
- The Conservation Land Trust, USA, Argentina, Chile
- Conservacion Patagonica, USA, Argentina
- Fundacion Pumalin, USA, Chile
- Douglas and Kristine Tompkins, USA
- Wolfgang Gerster, Germany
- Madhusree Mukerjee, writer, Germany
- Joanna Levitt, International Accountability Project, USA
- Gabriella Zanzanaini, Food & Water, Europe
- Wenonah Hauter, Executive Director, Food & Water Watch, USA
- Nina Holland, Corporate Europe Observatory, Belgium
- DeeVon Quirolo, Co-Founder of Reef Relief, USA
- Guadalupe Rodriguez, Salva la Selva, Spain
- Klaus Schenck, Rettet den Regenwald, Germany
- Béatrice Gorez, CFFA - CAPE, Belgium
- Anne Petermann, Global Justice Ecology Project, USA
- Mary Bricker-Jenkins, USA-Canada Alliance of Inhabitants (USACAI), USA
- Robert Jereski, New York Climate Action Group, USA
- Tim Keating, Rainforest Relief, USA

- Redmanglar Internacional, Latin America
- Jorge Varela, CODDEFFAGOLF, Honduras
- Henderson Colina, AEPA FALCON NGO, Venezuela
- Alianza por los manglares, Litorales, Aguas y Suelos ALMAS REDMANGLAR, Venezuela
- La Ventana AC de Mexico, Mexico
- Juan Carlos Cardenas, Centro Ecoceanos, Chile
- Juan Manuel Guevara
- Teresa Perez, World Rainforest Movement, Uruguay

- Rezwana Hasan, Bangaldesh Environmental Lawyers' Association, Bangladesh
- Hasan Mehedi, Humanitywatch, Bangladesh
- Shamsul Huda, Association for Land Reform and Development (ALRD), Bangladesh

- Meghnaguha Thakurata, Research Initiatives Bangladesh (RIB), Bangladesh
- Philip Gain, Society for Environment and Human Development (SEHD), Bangladesh
- Khorshed Alam, Alternative Movement for Resources and Freedom Society, Bangladesh
- Ashraf Mohammed, Bangladesh
- Anti-Debt Coalition (KAU), Indonesia
- Black Tiger Shrimp Farmers' Union (P3UW), Indonesia
- Institute of Global Justice (IGJ), Indonesia
- Berry Nahdian Furqon, Indonesia
- Ruddy Gustave, KONPHALINDO, Indonesia
- Muhammad Reza, Serikat Nelayan Indonesia / Indonesia Fisherfolk Union, Indonesia
- Nurhidayat Moenir, Jaringan Kerja Pemetaan Partisipatif (JKPP), Indonesia
- Geetha Lakmini, Food Sovereignty Network, Sri Lanka
- Herman Kumara, National Fisheries Solidarity Movement, Sri Lanka
- Shamith Roshan, Youth in Action (YinA), Sri Lanka
- Thomas Kocherry, National Fishworkers' Forum (NFF), India
- Bijaya Kumar Kabi, Action for Protection of Wild Animals, India
- Kunal Deb, Uthnau, India.
- Samir Acharya, Society for Andaman and Nicobar Ecology, India
- Javier M. Claparols, Ecological Society of the Philippines, IUCN-CEESP, Philippines
- S.M. Mohamed Idris, Consumers' Association of Penang, Malaysia
- Meenakshi Raman, Sahabat Alam Malaysia (Friends of the Earth Malaysia), Malaysia
- Chee Yoke Ling, Third World Network, Malaysia
- Akie Hart, Mangrove Forest Conservation Society of Nigeria
- Tekena Opukunachukwu, Grassroots Coalition for Transparency and Good Governance, Nigeria
- Nemi Tammuno, Rural Initiative for Community Empowerment, Nigeria
- Shedrach Philimon, Rural Communities Development Association, Nigeria
- Parker Lawson, Economic Empowerment and Environmental Protection Network, Nigeria
- Ibiwari Hector, Peace and Justice Foundation, Nigeria
- Henry Folawiyor, Child Rights Initiative, Nigeria
- Junior Pepple, Bethaisda Environmental Foundation, Nigeria
- Clifford Opusunju, Positive Change Advocates, Nigeria
- Nenibarini Zabbey, Centre for Environment, Human Rights and Development (CEHRD), Nigeria
- Ekindi Moudingo, Cameroon Wildlife Conservation Society, Cameroon
- Edem Edem, African Mangrove Network, Nigeria
- Wally Menne, Timberwatch Coalition, South Africa
- Rowland Benjamin, Information for Action, Perth, Western Australia