

February 27, 2015

The World Bank
Attn: Executive Committee on Development Effectiveness
1818 H Street, NW
Washington, DC 20433

Re: Issues to be addressed in the revised Environmental and Social Framework

Dear The World Bank:

Oceana is the largest international organization working solely to protect the world's oceans. Our teams of professionals work in nearly every region of the world on a limited number of strategic, directed campaigns to achieve measurable outcomes that will help return our oceans to former levels of abundance.

Ocean conservation and global food security are inextricably connected. As the world's population continues to grow, so will the demand for fish – which is projected to rise by more than 20 percent by 2030. Yet nearly 90 percent of the world's fisheries are currently close to, have reached, or exceeded their biological limits.

The World Bank has the responsibility and potential to be a major contributor in achieving sustainable fisheries. We are taking this first opportunity to raise two key issues that should be addressed in the Environmental and Social Framework.

The Bank should ensure that projects and financing do not support aquaculture or fish farming activities that use wild-caught fish for feed.

Aquaculture's use of wild fish for feed is not a sustainable use of a resource. Species such as grouper, shrimp, salmon, and other finfish are frequently fed wild-caught fish. This amounts to a huge number of fish that are caught and ground up for feed. In 2012, roughly one-fifth of the world's marine catch was converted to fish meal and fish oil. More than 80 percent of this was used for aquaculture.

The use of wild fish for feed exacerbates the pressure on marine ecosystems and reduces the amount of wild fish available for direct consumption. Aquaculture can play an essential part of the solution to global food security but for that to happen, it must truly add edible protein to the world.

The Bank should ensure that projects and financing that have the potential to increase fishing capacity do not contribute to fisheries depletion. The Bank should require investments in fisheries stock assessments as a condition in fisheries-related (e.g. fish landings; storage, production, or post-harvest facilities) or ocean-related projects (e.g. ports).

In many countries, fish is a very important source of protein and fishing activities support coastal communities and hundreds of millions of people who depend on fishing for all or part of their income. In these countries, fisheries related activities are also a source of livelihood and empowerment to women.

However, worldwide, and particularly in developing countries, stock assessment data is poor. A key reason for that is the lack of funding and technical skills available.

The World Bank can be instrumental in providing the financial resources for fisheries stock assessment to countries with poor data environments. Investing in fisheries stock assessments would allow better decision-making and management and, as a result, play a crucial role in ensuring long-term food security and protecting a source of income in many countries.

It is essential that The World Bank addresses these issues in its revised Environmental and Social Framework. We look forward to working with you on this important initiative.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Hirshfield', with a long horizontal flourish extending to the right.

Michael F. Hirshfield, Ph.D.
Chief Scientist and Strategy Officer