



Graefelfing, 11.10.2011

## Naturland Reply to the Swedish Society for Nature's Publications on Certified Organic Shrimp Farming in Ecuador, October 2011

### Preface

In October 2011, SSNC published a 60 pages paper and a 9:31 minutes movie<sup>1</sup> dealing with ecological and social aspects of the conventional shrimp sector in Bangladesh and the certified organic shrimp farming initiative in Ecuador, concluding with a plain call for boycott "*We call on all Swedish consumers, importers, shops and restaurants to stop consuming, buying, selling(.) and marketing tropical shrimp – regardless of whether they are certified*" (p.2). In order to support this extreme position, the SSNC publications create a misleading picture of certified organic shrimp farming, and they distort information given by the individual farms or fishers to SSNC, made available through Naturland homepage, or published in other media. The expert statements in the publication stem from dedicated anti-shrimp activists (e.g. C-Condem, MAP; p. 41, 45, 56), and neither the organic farms, nor Naturland had been given an adequate opportunity to comment or correct figures and other statements before being published and broadcasted.

With such a campaign, SSNC not only disesteems the achievements and efforts by the certified organic companies, and the relevance of the organic concept. What may be worse, SSNC pretends a shrimp boycott to be some kind of "consensual demand" of coastal communities or the wider society in Ecuador, which is by far not the case (e.g. for the many thousands of regular jobs created in farming, processing, and supplying branches).

SSNC has regrettably missed the opportunity to transport objective, balanced, and instructive information to interested consumers and market players. Nevertheless, the publications still may serve for fostering public interest in sustainable shrimp farming concepts, and in the achievements of the organic movement on this important field. In this spirit, Naturland expresses its continued willingness to contribute to the public dialogue in Sweden and elsewhere. Precondition, however, is that this dialogue is based on facts, fair, and run on a level playing field, where the different views get their chance to be heard.

This interim reply will focus on SSNC's objections (1) to transparency and viability of Naturland inspection and certification scheme, (2) to the effectiveness and extent of reforestation activities, and (3) to the active avoidance of stakeholder conflicts, as stipulated by the Naturland aquaculture standards<sup>2</sup>.

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<sup>1</sup> Title of the report: „Murky Waters - The environmental and social impacts of shrimp farming in Bangladesh and Ecuador“, title of the movie „The truth behind "organic" shrimp farming in Ecuador“. These productions are based on an „*investigating team*“ spending time in Ecuador and were financed by the Swedish Agency for International Development Cooperation (SIDA), which, however, „*has not participated in the production of the publication and has not evaluated the facts or opinions that are expressed*“ (p.2). In the following, page numbers (p.2) refer to the report, time data (5,3) to the movie.

<sup>2</sup> This is not the place to repeat basics about organic aquaculture; a global report on historical development, certification programs, products, markets, and selected country profiles, is available under (<http://tinyurl.com/IFOAM-Bookstore>). In addition, Naturland shrimp certification standards have been evaluated and ranked in several publications (e.g. <http://tinyurl.com/WWF-benchmarking>).

## 1) Organic shrimp aquaculture – points worth considering

There is ample scientific literature on the global relevance and prospects of aquaculture, in relation to sustainable coastal zone management, world protein supply, and poverty alleviation. Numerous case studies have, furthermore, highlighted the situation of shrimp aquaculture in several subtropical and tropical countries, with respect to the social, ecological, and economical environment. Even if the picture is, not surprisingly, diverse, there is broad international consensus that

- aquaculture is contributing significantly to world seafood supply and will increasingly do so in future.
- aquaculture products are a central element of many Southern countries' participation at the world market.
- the crucial point is to identify sustainable types of aquaculture.
- shrimps and prawns are good candidates for sustainable aquaculture, particularly due to their herbivorous/omnivorous habits (less demand for external protein feed) and the various species' tolerance to different levels of salinity.
- major challenges in sustainable shrimp farming are adequate site selection, mangrove protection, animal welfare in breeding technology, avoidance of noxious chemicals, and equilibrating the intensity of farming for minimizing nutrients' release into neighbouring water bodies.  
Furthermore, it is a challenge to find socially and economically durable production systems, appreciated by the society for provision of quality employment and contribution to coastal infrastructure, and able to withstand the permanent increase of energy and feed costs.

The global organic movement, lead in the field of aquaculture by Naturland association, has tackled these challenges since the late 90ties and carried out pilot projects, developing precise certification standards and establishing reliable certification systems in many tropical countries (Bangladesh, Brazil, Costa Rica, Ecuador, India, Indonesia, Madagascar, Peru, Thailand, Vietnam)<sup>3</sup>.

Today, only a tiny fraction of shrimp farm area is *certified* organic yet (globally less than 1%, in Ecuador below 2%). Nevertheless, a much bigger percentage of shrimp is already farmed *close* to organic principles, particularly in Asia, but has not consolidated this practice and transferred it into a certifiable stage yet. For the structure of shrimp market, it is evident that shrimp farming is not going to be abandoned, not even in the case of a Swedish boycott. On the other hand, well informed consumers in the North can make a difference and *spearhead* the trend towards sustainable production methods.

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<sup>3</sup> Since 2010, there is also a public EU regulation on organic shrimp aquaculture in place, based on this previous work by private organizations, but with the character of a “minimum requirement” and far less demanding with respect to ecological and social issues than Naturland standards. More recently, also several conventional schemes (e.g. GlobalGap, ASC) have appeared on the scene, but also are less stringent in numerous aspects (e.g. regarding antibiotics, GMO, origin of feed, stocking densities).

## 2) Is the Naturland certification scheme transparent and reliable?

The Naturland certification is based on standards that can be downloaded from our homepage in three languages. These standards are regularly revised and updated, taking into account new technical or political insights. On numerous occasions, we present the standards to international audiences, and we are in a permanent communication about the content with technical experts, NGOs, scientific institutions, and consumers. The crucial thing in standard setting is transferring more general principles into operational, precise checkpoints, which can effectively be verified during the obligatory, annual inspections. Naturland is cooperating with a number of different, independent inspection bodies, according to the technical field and the location of a project (e.g. regarding the local language), which allows us to maintain a certification service covering many different products and countries. Naturland regularly carries out trainings for all the inspectors. Finally, the inspection reports go to the Naturland Certification Committee, independent experts who revise the reports and take the decision about certification, sanctions, conditions etc..

This whole Naturland quality system itself is accredited under ISO 65 and IOAS, making sure that we fulfil the requirements for a reliable third-party certification. Equally, we require that our cooperating inspection bodies are ISO 65 accredited.

An important aspect of the ISO accreditation is the prompt and diligent handling of complaints, e.g. by an independent observer who has got aware of a non-compliance with Naturland standards by a certified farm or company. Such complaints don't have to be in a particular format, and can be submitted orally, per email, publically, anonymous etc.. We are sure that nobody can evidence a case where a substantiated complaint has not been dealt with, bringing it to an efficient solution or ending the infringement of Naturland standards<sup>4</sup>. Contacting Naturland for complaints (or any other concerns) is facilitated by our regional representatives, e.g. in Mexico, India, and Ecuador. Naturland has been maintaining a representation in Ecuador for more than ten years, and the colleagues in charge have always been in dense touch with farmers, NGOs, media, governmental bodies etc.. In summary, Naturland has it's eyes and ears wide open e.g. for fishers' organisations that have an issue with access to water bodies bordering a certified farm, or for an environmental NGO feeling that reforestation duties are not duly implemented.

The SSNC publications, needless to say, represent a type of complaint against Naturland certified shrimp farms. Therefore, we have evaluated the specific accusations against individual farms, particularly comparing them with the findings in the annual inspection reports, and other accompanying documentation, as reforestation plans. So far, the SSNC accusations could not be substantiated, but proved to be either intangible and vague assumptions on the overall situation of shrimp farming in Ecuador, or clear misinterpretations of information given by the farms to SSNC, that better should have been counterchecked before publication. A drastic example for such tendentious reporting is the incorrect English translation of a shrimp farm biologist's explanation (2:09), captured by a hidden camera (s. below).

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<sup>4</sup> Which, of course, may include de-certification of companies.

### **3) Are the Naturland mangrove reforestation standards clear, practicable, implemented by the farms, and controlled by the annual inspections?**

Naturland standards require the certified farms to reforest 50% of their former/historical mangrove area within five years. In order to control the progress of the reforestation, a specific reforestation plan is fixed with each company, and the yearly progress is inspected<sup>5</sup>.

Using the example of OMARSA's organic shrimp farms, SSNC wishes to create the impression as if the stipulated reforestation targets were not met by the farms, and as if organic certifiers were "...allowing the company to work under the reforestation targets because costs are too high" (p. 42). From this, SSNC concludes that "...OMARSA's aim is to benefit from premium prices [...] without using the financial benefits to meet organic targets for reforestation" (p.42). For evidencing this allegation, SSNC is citing Sr. Lenin Vera, OMARSA's biologist. Fortunately, his statement has not only been reported in written form, but also captured by a hidden camera (2:09).

Sr. Vera said: "[...] en el Ecuador devengar una piscina de producción a reforestación es bajar la producción... (the reporter: "mucho costo...") ... mucho costo, exactamente..." ("Mucho costo" means "high costs" or very expensive"). Incorrectly, SSNC's translator wrote in the subtitles and in the paper (p.42): "[...] Reforestation is a struggle in Ecuador. Delegating a pond to reforestation means loss in production, so it's too costly to do." Needless to point out what difference light the two versions throw on the company's attitude towards reforestation...

From the previous inspection reports and accompanying documentation, but also from our representative's visits at the farm, we have no doubt that OMARSA, as the other Naturland certified shrimp farms, will be able to reach the reforestation target as stipulated in the reforestation plan and in the time frame defined by our standards. A recent census of reforested areas by all Naturland certified farms in Ecuador revealed nearly 350 ha<sup>6</sup> of newly planted mangrove trees, more than any comparable initiative.

Naturland is striving to improve biodiversity of reforested mangrove species, and is addressing this aspect for several years not only in Ecuador, but also in the South-East Asian projects. In this respect, we agree with Mr. Alfredo Quarto that "[...] to only plant red mangrove trees is insufficient" (p. 45). We also agree with Mr. Robin Lewis that it is important that state-of-the-art methods are used for replanting. Nevertheless, such improvements can only be introduced jointly with the farms and in a climate of cooperation and trust - not by imbalanced criticism and calls for boycott.

### **4) How do certified organic shrimp farms actively avoid conflicts with artisanal fishers in their surroundings?**

As earlier SSNC releases, the 2011 publications are promoting a global stop of shrimp aquaculture, turning the coasts into preserved areas, accessed only by artisanal fishers. From a "Northern" perspective, such a scenario is tempting: With preoccupation, we watch Southern countries turning pristine ecosystems into cultivated landscape, and easily we identify and embrace local stakeholders who seem to advocate and support our vision of "untouched nature". Accordingly, SSNC is painting the punchy picture of a conflict between poor artisan fishers, struggling for their

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<sup>5</sup> The reforestation plan – different from SSNC's apparent assumptions (p.42) – is not necessarily stipulating an equal percentage mangrove (i.e. 20% of final figure) to be planted each year.

<sup>6</sup> The total „reforestation duty“ adds up to only ca. 203 ha. Some of the farms have by far exceeded the target stipulated by Naturland, others, like OMARSA, are still in the 5 years initial replanting period, so that the overall reforested mangrove area is continuing to increase.

livelihood and defending the mangrove, and the shrimp industry trying to chase them off and to destroy the forest.

However, this is a drastic oversimplification of the situation, as some aspects may illustrate:

- Former mangrove areas are not the “normal” location for a shrimp farm, being technically not desirable for the low pH of mangrove soils, and legally in many countries under dispute. Most shrimp farms had only expanded to minor parts of their area into mangrove, and, e.g. in Ecuador, are now facing reforestation duties.
- By far the greatest losses of mangrove forest have occurred (and still occur) for timber and charcoal, not for construction of shrimp farms (s. p. 34).
- In many cases, a fishing village benefits from a shrimp farm in the vicinity, e.g. by receiving technical or financial support for infrastructural measures (e.g. drinking water supply, medical service).
- Artisanal fishers are worldwide aiming to become formalized and exclusive users of defined areas; an “open access” concept for the poorest families' subsistence as described by SSNC (s. p. 35) is nowhere considered a desirable goal for fisheries' management.
- The motive for shrimp farms to employ guards is to prevent from shrimp and machinery robbery. The individuals committing such criminal acts are typically not the fishers, and the regular fishers' community does not support them.

For inspection and certification, Naturland is stipulating that each shrimp farm, together with the fishing communities in the surroundings, establishes and implements a protocol regulating the “stakeholder conduct”, e.g. regarding access rights for the fishers, and the rights to control for the farms. Moreover, this conduct may also refer e.g. to supply of drinking water or transport infrastructure, of course according to the geographical and social situation.

The SSNC publication shows a complaint letter (p. 53), filed by fishermen that are claiming LANGOSMAR's guard to have taken away their boat and pointed with a gun at them. While Naturland was investigating this case further, these Sabana Grande fishermen confirmed in another signed letter that this was a misunderstanding, caused by the fact that they hadn't had their papers (the fishing licences) at hand. Now, with their licenses at hand, the case is solved, and they even declared they would be happy with LANGOSMAR to establish more control points, in order to prevent from unregulated fishing by non-registered fishers<sup>7</sup>.

This case illustrates the complexity of interactions between a farm and the fishers (and other stakeholders), and it underlines the necessity for a procedure at least similar to what Naturland has stipulated. On the other hand, it is not adequate to create the picture of a “law of the jungle” environment in Ecuador, as the SSNC publications do. The Ecuadorean legislative process on stakeholder issues around shrimp farming and artisanal fishing has taken momentum in the recent years, and the role of Naturland certification is, obviously, to support the process and, where needed, filling gaps.

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<sup>7</sup> We think it's not appropriate to attach this letter here, because we haven't checked publication of the letter with the signing fishers yet.

## 5) Finally - a look forward

Certified organic shrimp farming is an important instrument for making world's aquaculture more sustainable. As pointed out, the prospects for further spreading the initiative are good, not by launching new farms<sup>8</sup>, but by converting existing operations to organic management.

Besides from offering a reliable certification service, Naturland is also aiming to develop the organic concepts further, e.g. by companying, initiating, and actively carrying out projects. In organic shrimp farming, we see the need for further development work, particularly regarding

- Initiating/increasing organic feed raw material supply from agriculture in the shrimp farming countries, taking into account also alternative feed sources, like e.g. manioc, jatropha, water hyacinth, fruit processing by-products etc.
- Implementing a Fair Trade scheme for farmed shrimp
- Identifying viable breeding techniques for Black Tiger and Western White shrimp that are completely independent from eyestalk ablation and wild parent stock<sup>9</sup>.
- Carrying out pilot projects with community silvo-aquaculture systems, possibly combined with fishing and collecting activities (e.g. collecting mud crab seedlings for fattening in enclosures).
- Investigating further options regarding mangrove biodiversity in reforestation and reforestation techniques

Organic shrimp farming is still a young initiative, and the certified companies are doing a difficult pioneering job, not only by dealing with new, alternative production methods, accepting costly reforestation duties, and creating consumers' awareness in the different markets, but also by undergoing a third-party inspection and certification procedure, surrounded by conventional competitors, who don't. They deserve recognition for taking this route.



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<sup>8</sup> The SSNC publications may create the impression, as if the main concern was about construction of new shrimp farms ("*ongoing destruction*", p. 69). In reality, most "shrimp countries", as Ecuador, are not increasing their farm area further.

<sup>9</sup> SSNC suggests that the problem is "[...] *the cost of production rather than lack of techniques...*" (p.49). In practice, such a technical model just doesn't exist yet.