



UK Charity #1152654

## CONSERVATION – EDUCATION – RESEARCH – EXPEDITIONS

Shark Guardian

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To: Mr. Cameron Mackintosh, Managing Director, Princes Limited  
cc: Mr. Tatsuo Okura, Director, Princes Limited  
cc: Mr. Stephen Cardall, Director, Princes Limited  
cc: Mr. Kazuo Ito, Director, Princes Limited  
cc: Mr. Satoshi Nakaniwa, Director, Princes Limited  
cc: Mr. Kazuhito Suematsu, Director, Princes Limited  
cc: Mr. Akihiko Takada, Director, Princes Limited  
cc: Mr. Neil Bohannon, Group Director Fish, Princes Group, UK  
cc: Mr. Ken Murphy, CEO, Tesco PLC  
cc: Mr. Simon Roberts, CEO, Sainsbury's

*via post and e-mail*

18 August 2022

### **Re: Princes Limited & Sustainability (Sharks, Rays and Turtles)**

Dear Mr. Mackintosh,

We are writing to you with regards to Princes Limited's commitment to sustainability.

Princes Limited is one of the world's leading food brands, and we applaud your stated commitment to sustainable development. We also appreciate your Mitsubishi parent group's unique [Three Corporate Principles](#) of 'Shoki Hoko', 'Shoji Komei' and 'Ritsugyo Boeki'.

We are carrying out an environmental audit to better understand whether sharks and other endangered marine species are being caught up in the wild capture stage of the supply chains of various global food manufacturers and processors. By limiting our initial research to the Indian Ocean region only, we have identified from your [website](#) that Princes Limited sources tuna from questionable suppliers that employ harmful drifting Fish Aggregating Devices (dFADs) in their fishing operations.

Our research has found that one of your principal suppliers, OPAGAC (also known as AGAC), a Spanish conglomerate of large tuna fishing companies that uses purse seine fishing nets associated with dFADs in the Indian Ocean, unsustainably harvests tuna from the so-called Sustainable Indian Ocean Tuna Initiative ([SIOTI](#)) Fishery Improvement Project (FIP) –which Princes Limited [sources](#) much of its tuna from and is a founding member. According to the SIOTI FIP webpage on [FisheryProgress.org](#), this disastrous FIP has [no harvest strategy](#), no harvest control rules, and zero tools in place to ensure sustainable fish stocks:

# 1 - Sustainable fish stocks

Indicator	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5
<a href="#">Stock status outcome (1.1.1)</a>						
<a href="#">Stock rebuilding outcome (1.1.2)</a>						
<a href="#">Harvest strategy (1.2.1)</a>						
<a href="#">Harvest control rules &amp; tools (1.2.2)</a>						
<a href="#">Harvest strategy information &amp; monitoring (1.2.3)</a>						
<a href="#">Assessment of stock status (1.2.4)</a>						

(Data extracted from 'Improvement Progress' page of Indian Ocean tuna - purse seine (SIOTI) webpage on FisheryProgress.org)

According to human-observer data covering the four-year period from 2015 to 2018, as extracted from page 143 of AGAC's 'Four Oceans Integral Purse Seine Tropical Tuna Fishery (Indian Ocean) Announcement Comment Draft Report' which was posted on the MSC's '[Track A Fishery](#)' website on 21 August 2020, your supplier OPAGAC caught a staggeringly high number of vulnerable, endangered, threatened and protected shark, ray and turtle species during that four year period:

Shark/Ray/Turtle Common Name	Shark/Ray Scientific Name	Tonnes (Estimated total weight of catch (t) based on ratio of skipjack tuna observed catch to skipjack tuna logbook catch, annually.)	International Union for the Conservation of Nature (IUCN) Red List Status
Silky shark	<i>Carcharhinus falciformis</i>	471	Vulnerable (decreasing)
Giant Oceanic Manta Ray	<i>Manta birostris</i>	28	Endangered (decreasing)
Whale shark	<i>Rhincondon typus</i>	23	Endangered (decreasing)
Bull shark	<i>Carcharhinus leucas</i>	18	Vulnerable (decreasing)
Non-identified shark	<i>Requin non identifié</i>	12	N/A
Oceanic whitetip shark	<i>Carcharhinus longimanus</i>	13	Critically Endangered (decreasing)
Devil rays	<i>Mobula sp.</i>	5	Vulnerable/Endangered (decreasing)
Spinetail Devil Ray	<i>Mobula japonica</i>	2	Endangered (decreasing)
Olive Ridley Sea Turtle	<i>Lepidochelys olivecea</i>	1	Vulnerable (decreasing)
Loggerhead Sea Turtle	<i>Caretta caretta</i>	1	Vulnerable (decreasing)

Looking at the above table, and taking silky sharks as an example, 471 tonnes of silky sharks extrapolates to a staggering 9,420 individual animals (based on an average body weight of twenty kilograms for a juvenile silky shark). This is shocking, and overall, it is estimated that between 480,000 to 960,000 juvenile silky sharks are entangled, and subsequently slaughtered, each year in Indian Ocean dFADs. (Filmlalter et al. 2013). This is an unmitigated, yet largely unwitnessed, environmental disaster, and our aim is to highlight this ecological carnage to the public.

Turning to a currently bleak future – unless your company acts – according to a recent report of the Scientific Committee of the Indian Ocean Tuna Commission (IOTC), “the increase in [yellowfin tuna] catches in recent years has substantially increased the pressure on the Indian Ocean stock, resulting in fishing mortality exceeding the [maximum sustainable yield] MSY-related levels”. This suggests that bycatch numbers will also be driven by OPAGAC and others to increase dramatically. These are the very same Indian Ocean purse seine fishing companies that Princes Limited source enormous quantities of unsustainable tuna from. Therefore we strongly urge your company to please stop immediately sourcing from OPAGAC, and others like them, with immediate effect.



LR  
Announcement Comment Draft Report  
AGAC four oceans Integral Purse Seine Tropical Tuna Fishery (Indian Ocean)



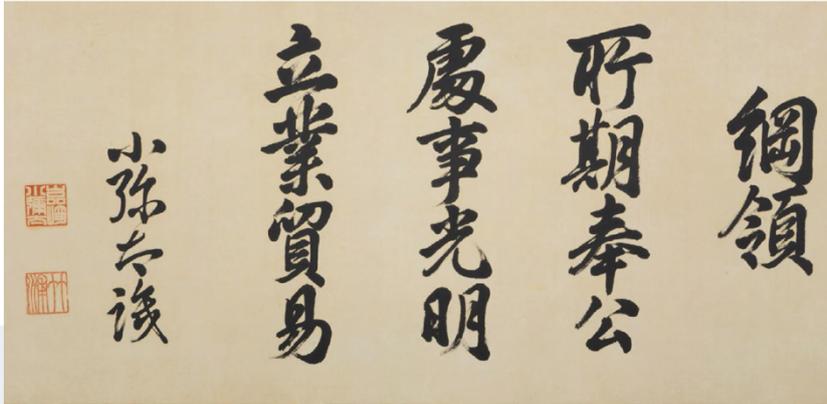
Table 42. Catch profile for the OPAGAC Indian Ocean tuna fishery based on human-observer data (source: OPAGAC)

Rank	Species	Common name	Observed weight (t) by Year				Mean wt. (t) 2015-2018	Observed weight (% of total) by Year				Mean % 2015-2018	Estimated total weight of catch (t) based on ratio of SKJ observed catch to SKJ total logbook catch, annually.				
			2015	2016	2017	2018		2015	2016	2017	2018		2015	2016	2017	2018	Mean 2015-18
1	Katsuwonus pelamis	Skipjack tuna	27,155,551	18,659,000	22,924,118	43,494,215	28,058,221	46.104	53.309	61.694	70.975	58.021	51,842	81,127	102,585	134,575	92,532
2	Thunnus albacares	Yellowfin tuna	25,553,291	12,432,950	8,539,280	8,934,550	13,862,768	43.384	35.521	22.957	14.580	29.110	48,783	54,057	38,173	27,644	42,164
3	Thunnus obesus	Bigeye tuna	5,080,935	3,133,070	4,663,010	5,288,534	4,541,387	8.626	8.951	12.549	8.630	9.689	9,700	13,622	20,867	16,363	15,138
4	Thunnus alalunga	Albacore tuna	213,200	17,000	203,000	1,577,000	502,550	0.362	0.049	0.546	2.573	0.883	407	74	908	4,879	1,567
5	Elagalis bipinnulata	Rainbow runner	253,963	152,065	115,778	130,803	163,152	0.431	0.434	0.312	0.213	0.348	485	661	518	405	517
6	Coryphaena hippurus	Common dolphinfish	213,126	117,431	112,785	141,709	146,263	0.362	0.336	0.304	0.231	0.308	407	511	505	438	465
7	Auxis thazard	Frigate tuna	0.061	21,260	270,895	251,455	135,918	0.000	0.061	0.729	0.410	0.300	0	92	1,212	778	521
8	Carcharhinus falciformis	Silky shark	134,858	111,525	121,415	193,261	140,265	0.229	0.319	0.327	0.315	0.297	257	485	543	598	471
9	Auxis spp	Frigate tunas	0.300	17,690	5,984	647,010	167,746	0.001	0.051	0.016	1.056	0.281	1	77	27	2,002	527
10	Canthidermis maculata	Rough triggerfish	58,907	76,835	32,030	49,445	54,304	0.100	0.220	0.086	0.081	0.122	112	334	143	153	186
11	Auxis rochei	Bullet tuna	0.340	93,308	41,000	64,780	49,857	0.001	0.267	0.110	0.106	0.121	1	406	183	200	198
12	Euthynnus affinis	Kawakawa	0.005	32,500	21,300	184,262	59,517	0.000	0.093	0.057	0.301	0.113	0	141	95	570	202
13	Acanthocybium solandri	Wahoo	77,659	30,134	44,152	46,378	49,583	0.132	0.086	0.119	0.076	0.103	148	131	198	143	155
14	Toto el banco	Slipped catch	14,000	10,000	-	200,000	59,000	0.024	0.029	0.000	0.326	0.095	27	43	-	619	172
15	Makaira indica	Black marlin	8,374	15,889	13,106	14,148	12,879	0.014	0.045	0.035	0.023	0.029	16	69	59	44	47
16	Makaira nigricans	Atlantic Blue Marlin	15,292	11,672	9,743	16,934	13,410	0.026	0.033	0.026	0.028	0.028	29	51	44	52	44
17	Decapterus macarellus	Mackerel scad	6,610	13,103	8,195	16,781	11,172	0.011	0.037	0.022	0.027	0.025	13	57	37	52	40
18	Manta birostris	Giant Oceanic Manta Ray	10,506	5,853	13,849	0,983	7,798	0.018	0.017	0.037	0.002	0.018	20	25	62	3	28
19	Carcharhinidae sp.	Requiem sharks	32,150	-	-	1,500	8,413	0.055	0.000	0.000	0.002	0.014	61	-	-	5	17
20	Rhincodon typus	Whale shark	0.538	7,169	13,197	-	5,226	0.001	0.020	0.036	0.000	0.014	1	31	59	-	23
21	Carcharhinus leucas	Bull shark	8,400	12,525	-	0,075	5,250	0.014	0.036	0.000	0.000	0.013	16	54	-	0	18
22	Requin non identifié	Non identified shark	21,750	1,150	-	-	5,725	0.037	0.003	0.000	0.000	0.010	42	5	-	-	12
23	Sphyrna barracuda	Great barracuda	5,141	7,432	1,679	3,057	4,327	0.009	0.021	0.005	0.005	0.010	10	32	8	9	15
24	Carcharhinus longimanus	Oceanic whitetip	5,690	2,139	2,658	6,214	4,175	0.010	0.006	0.007	0.010	0.008	11	9	12	19	13
25	Lobotes sunnamiensis	Tripletail	2,497	5,701	2,264	3,628	3,522	0.004	0.016	0.006	0.006	0.008	5	25	10	11	13
26	Xiphias gladius	Swordfish	8,208	1,322	-	0,006	2,384	0.014	0.004	0.000	0.000	0.004	16	6	-	0	5
27	Mobula sp.	Devil rays	1,808	1,600	1,660	0,900	1,492	0.003	0.005	0.004	0.001	0.003	3	7	7	3	5
28	Tetrapturus audax	Striped marlin	3,077	1,020	0,915	-	1,253	0.005	0.003	0.002	0.000	0.003	6	4	4	-	4
29	Remora albigescens	White suckerfish	-	-	-	-	0,386	0.000	0.010	0.000	0.000	0.002	-	15	-	-	4
30	Scomber japonicus	Chub mackerel	2,069	1,216	0,775	-	1,015	0.004	0.003	0.002	0.000	0.002	4	5	3	-	3
31	Aluterus monoceros	Unicorn leatherjacket	1,120	1,289	0,059	1,326	0,949	0.002	0.004	0.000	0.002	0.002	2	6	0	4	3
32	Istiphiidae	Billfish	1,892	0,954	0,219	0,343	0,852	0.003	0.003	0.001	0.001	0.002	4	4	1	1	2
33	Coryphaena equiselis	Pompano dolphinfish	0,044	1,036	0,048	1,764	0,723	0.000	0.003	0.000	0.003	0.002	0	5	0	5	3
34	Coryphaenidae	Dolphinfishes	0,050	0,020	0,485	2,705	0,815	0.000	0.000	0.001	0.004	0.001	0	0	2	8	3
35	Mobula japonica	Spinetail Devil Ray	0,750	0,150	0,750	0,600	0,563	0.001	0.000	0.002	0.001	0.001	1	1	3	2	2
43	Lepidochelys olivacea	Olive Ridley sea turtle	-	0,067	0,357	0,246	0,167	0.000	0.000	0.001	0.000	0.000	-	0	2	1	1
44	Caretta caretta	Loggerhead sea turtle	0,051	0,037	0,254	0,307	0,162	0.000	0.000	0.001	0.001	0.000	0	0	1	1	1
46	Mobula mobular	Devil fish	0,300	-	-	0,450	0,188	0.001	0.000	0.000	0.001	0.000	1	-	-	1	0
51	Alopias superciliosus	Bigeye thresher	0,500	-	-	-	0,125	0.001	0.000	0.000	0.000	0.000	1	-	-	-	0
54	Testudinines	Turtle	-	0,080	-	0,280	0,090	0.000	0.000	0.000	0.000	0.000	-	0	-	1	0
55	Lamna nasus	Porbeagle	0,350	-	-	-	0,088	0.001	0.000	0.000	0.000	0.000	1	-	-	-	0
58	Eretmochelys imbricata	Hawksbill turtle	0,023	0,178	-	0,004	0,051	0.000	0.001	0.000	0.000	0.000	0	1	-	0	0
64	Manta sp	Manta rays	0,100	0,050	-	0,050	0,050	0.000	0.000	0.000	0.000	0.000	0	0	-	0	0
66	Chelonia mydas	Green turtle	0,050	0,005	0,019	0,101	0,044	0.000	0.000	0.000	0.000	0.000	0	0	0	0	0
69	Mobula tarapacana	Chilean devil ray	0,150	-	-	-	0,038	0.000	0.000	0.000	0.000	0.000	0	-	-	-	0
56 other species / groups <0.001%			6,695	1,965	1,609	5,178	3,862	0.011	0.006	0.004	0.008	0.007	13	9	7	16	11
Total			58,900,388	35,001,741	37,157,585	61,280,982	48,085,174	100.00	100.00	100.00	100.00	100.00	112,446	152,183	166,280	189,609	155,129

Furthermore, dFADs are causing untold damage to coral reefs and beaches around the Indian Ocean due to plastic pollution from abandoned, lost, and discarded dFADs. This is yet another unfolding environmental disaster that Princes Limited is linked to through OPAGAC. (Burt et al. 2020)

Therefore, and unless your company can provide us with any credible information to the contrary, we believe that it is safe to assume that British consumers buying Princes tuna in UK supermarkets (such as Tesco and Sainsbury’s) are unwittingly contributing to vast amounts of plastic pollution, as well as the decimation of several vulnerable, endangered, threatened and protected shark, ray, and turtle populations in the Indian Ocean.

To that extent, and based on the information above, we urgently call on Princes Limited to apply its Three Corporate Principles by pledging to us, and our tens of thousands supporters worldwide, that it will conduct its sourcing operations in a truly sustainable fashion (and in line with United Nations Sustainable Development Goal #14) by stopping its sourcing of tuna from harmful fisheries that use environmentally destructive dFADs with immediate effect.



The image shows a piece of calligraphy on a light-colored background. The characters are written in black ink. From right to left, the characters are: 綱領 (Ritsugyo Boeki), 所期奉公 (Shoji Komei), 立業貿易 (Shoki Hoko), and 小孫太後 (Shoki Hoko). There are two red seals on the left side of the calligraphy.

CORPORATE RESPONSIBILITY TO SOCIETY	INTEGRITY AND FAIRNESS	GLOBAL UNDERSTANDING THROUGH BUSINESS
<b>"Shoki Hoko"</b>	<b>"Shoji Komei"</b>	<b>"Ritsugyo Boeki"</b>
Strive to enrich society, both materially and spiritually, while contributing towards the preservation of the global environment.	Maintain principles of transparency and openness, conducting business with integrity and fairness.	Expand business, based on an all-encompassing global perspective.

(The modern day interpretation of the Three Corporate Principles, as agreed on at the Mitsubishi Kinyokai meeting of the companies that constitute the so-called Mitsubishi group in January 2001.)

(Source: <https://issuu.com/princes6/docs/princes-business-report-2021-2022-iii>)

Sincerely yours,



Alex Hofford

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**Shark Guardian** - Shark & Marine Conservation Worldwide (UK Charity #1152654)

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