

28th November 2023

Mr. Michael Fakhri
Special Rapporteur on the Right to Food
OHCHR-UNOG
8-14 Avenue de la Paix
1211 Genève 10, Switzerland

Dear Mr. Fakhri,

We are writing to ask you to document and engage with the governments of Mauritania, Senegal, and the Gambia as well as global feed companies through a communication concerning the food security crisis which is depriving people of critical nutrition across the West Africa region, namely the commoditisation of wild-caught fish by global feed companies.

Every year, over half a million tonnes of pelagic fish – which could feed over 33 million people in the region – are instead extracted from the ocean along the coast of West Africa and converted to fishmeal and fish oil (FMFO) in order to primarily feed farmed fish and livestock, mostly in Europe and Asia.¹

Overfishing off the coast of several West African countries has left key fish species in a state the FAO has qualified as “alarming”². The diversion of fish caught off countries including Mauritania, Senegal, and the Gambia³ towards the production of fishmeal and fish oil to supply the global aquaculture and livestock industry is having devastating impacts on local people’s food security and livelihoods. As a diverse coalition of organisations working on fisheries, food systems, conservation, and human rights, some of which are based in West Africa, we have collectively spent years documenting this phenomenon and have witnessed first-hand how this problem has grown in recent decades. The global community’s uncritical embrace of this expanding ‘blue economy’ as one way of feeding a growing population has resulted in a boom in fish farming, notably of carnivorous fish, such as salmon, seabass, and seabream (principally sold in high-income markets), which all depend on feed that is made of fishmeal and fish oil as well as other human-edible food, such as soy.

Communities in West Africa are thus being deprived of a crucial source of food for the benefit of others. While some forms of aquaculture can improve food security, the farming of high trophic species such as salmon in the Global North is an inefficient way of producing both protein and micronutrients. At the same time, it is driving an unfair ‘food-feed’ competition with countries in the Global South. Research into micro-nutrient retention in farmed salmon [in Scotland](#) and Norway⁴, for instance, has shown that feeding whole, wild-caught fish to farmed fish leads to an overall loss of nutritional value for consumers, thus further undermining the case for depriving people in the Global South of an essential staple food when they are already vulnerable to food insecurity.

Throughout West Africa, communities are crying out as they see their livelihoods, and their food taken away. We ask you to consider the following examples:

¹ <http://changingmarkets.org/wp-content/uploads/2021/05/Feeding-a-Monster-EN-low-res.pdf>

² <https://www.fao.org/in-action/eaf-nansen/news-events/detail-events/en/c/1444341/> ;
<https://www.fao.org/3/cb9193en/cb9193en.pdf>

³ <https://www.greenpeace.org/international/press-release/11674/urgent-action-needed-to-solve-west-african-food-security-threat/> ; <https://www.amnesty.org/en/documents/afr27/6644/2023/en/> ;

<https://www.ohchr.org/sites/default/files/Documents/Issues/Environment/SREnvironment/Call/NGOs/GreenpeaceInputs1.pdf>

⁴ A report by Feedback Global is scheduled for publication in early November.

In Senegal, highly skilled women fish processors and fishmongers have been affected by the scarcity of pelagic fish and have to compete for what fish is available with fishmeal and fish oil factories, which pay a higher price than they can afford.⁵ This leaves them exposed to the dangers of extended unemployment and lack of income, very often leading to the health and education of their children being compromised.

In the Gambia, the cost of reduction fisheries and overfishing is clear. Artisanal fishing communities face increasing pressure from dwindling resources and unfair competition, which has led to [violence](#)⁶: on 15 March 2021, a protest that turned violent took place in Sanyang after a fisher who worked for a fishmeal factory allegedly killed a local man. The local population directed its frustration towards the Senegalese fishers and the fishmeal factory, burning substantial fishing equipment and part of the factory building. At least 50 people were arrested, some of them arbitrarily, and detained under poor conditions. The fishmeal factory targets pelagic fish, which are usually preferred by the local population for their daily protein intake due to their affordable price. However, local fishers, fish traders and artisanal fish processors complain about the lack of fish and the increase in prices since the arrival of the factory. Since factories in Gambia began processing bonga – the species most used by fish smokers in the country – its wholesale price has quadrupled.⁷ This not only has a negative impact on their standard of living but also threatens their food security.⁸

In Mauritania, a hotspot for the fishmeal and fish oil industry, the [problem is also replicated](#), violating the right to food whilst [stoking conflict](#).

Every day, people are subjected to multiple forms of abuse at the hands of this destructive industry: through deprivation of food, the destruction of their livelihoods, toxic pollution which could impact people's health, increased conflicts between communities fighting for scarce resources, all of this contributing to rising numbers of young people undertaking [dangerous migration out of desperation](#).

While this letter emphasizes the situation in three West African countries, we would like to stress that the right to food and the livelihoods of artisanal fishers and coastal communities is under threat in many regions of the world as a result of industrial aquaculture's voracious appetite for wild fish.⁹

We urge you to urgently call on the governments of Mauritania, Senegal and the Gambia to:

- Regulate the diversion of whole, human-edible fish to the fishmeal & fish oil and aquaculture industries and to protect local populations' right to food;
- Ensure preferential access to marine resources for artisanal fishing communities, whilst ensuring men and women from these fishing communities can effectively participate in national, regional and local decision-making processes impacting their lives;
- Ensure enough government resources for monitoring and preventing illegal, unreported and unregulated fishing, including providing more trained staff, monitoring tools and boats to their national navies.

We urge you to call on all states and other influential actors, especially those countries which import FMFO from West Africa, including Norway, the UK, the EU, China and Turkey, to strictly restrict the

⁵ <https://www.greenpeace.org.uk/wp-content/uploads/2022/09/Confronting-Injustice-2022-web.pdf>

⁶ <https://www.amnesty.org/en/documents/afr27/6644/2023/en/>

⁷ Thiao, D. and Bunting, S.W. 2022. Socio-economic and biological impacts of the fish-based feed industry for sub-Saharan Africa. FAO Fisheries and Aquaculture Circular No. 1236. Rome, FAO, Worldfish and University of Greenwich, Natural Resources Institute. <https://doi.org/10.4060/cb7990en>

⁸ <https://www.amnesty.org/en/latest/research/2023/06/the-human-cost-of-overfishing-in-gambia/>

⁹ <https://changingmarkets.org/wp-content/uploads/2019/10/CM-WEB-FINAL-FISHING-FOR-CATASTROPHE-2019.pdf>

imports of fish-based feed from regions where people are food insecure and where fish stocks are proven to be overexploited.¹⁰

We also urge you to call on farmed fish and aquafeed producing companies to introduce full transparency on their sourcing practices and to cease purchasing fishmeal and fish oil from regions experiencing food insecurity as a result of food-feed competition.

Furthermore, we would like to invite you to conduct an official country visit to West Africa and witness the impacts of the FMFO industry and overfishing by visiting local communities in the Gambia, Mauritania and Senegal hearing their story and witnessing what is happening on the ground to ensure, as you have previously said, that we can “carry on a message of hope rather than one of cynicism.”¹¹

We remain at your disposal for any further information.

Best Regards,

The signatory organisations:

Taxawu Cayar Collective
Réseau régional d'Aires Marines Protégées en
Afrique de l'Ouest (RAMPAO)
Sub-Regional Fisheries Commission (SRFC)
West African Association for the Development
of Artisanal Fisheries (WADAF)
Regional Partnership for Coastal and Marine
Conservation (PRCM)
Greenpeace Africa
Feedback EU

Feedback Global
Amnesty International
Coalition for Fair Fisheries Arrangements
Oceana
Nourish Scotland
Blue Ventures
Environmental Justice Foundation
Christina Hicks - Professor at Lancaster
University



¹⁰ <http://changingmarkets.org/wp-content/uploads/2021/05/Feeding-a-Monster-EN-low-res.pdf>

¹¹ https://www.ohchr.org/sites/default/files/documents/issues/food/2022-10-11/SR-Food-Fakhri-Opening-Plenary-Speech_10102022.pdf