



Oceans Under Threat

Seafood Sector Influence on Government Biodiversity Policy

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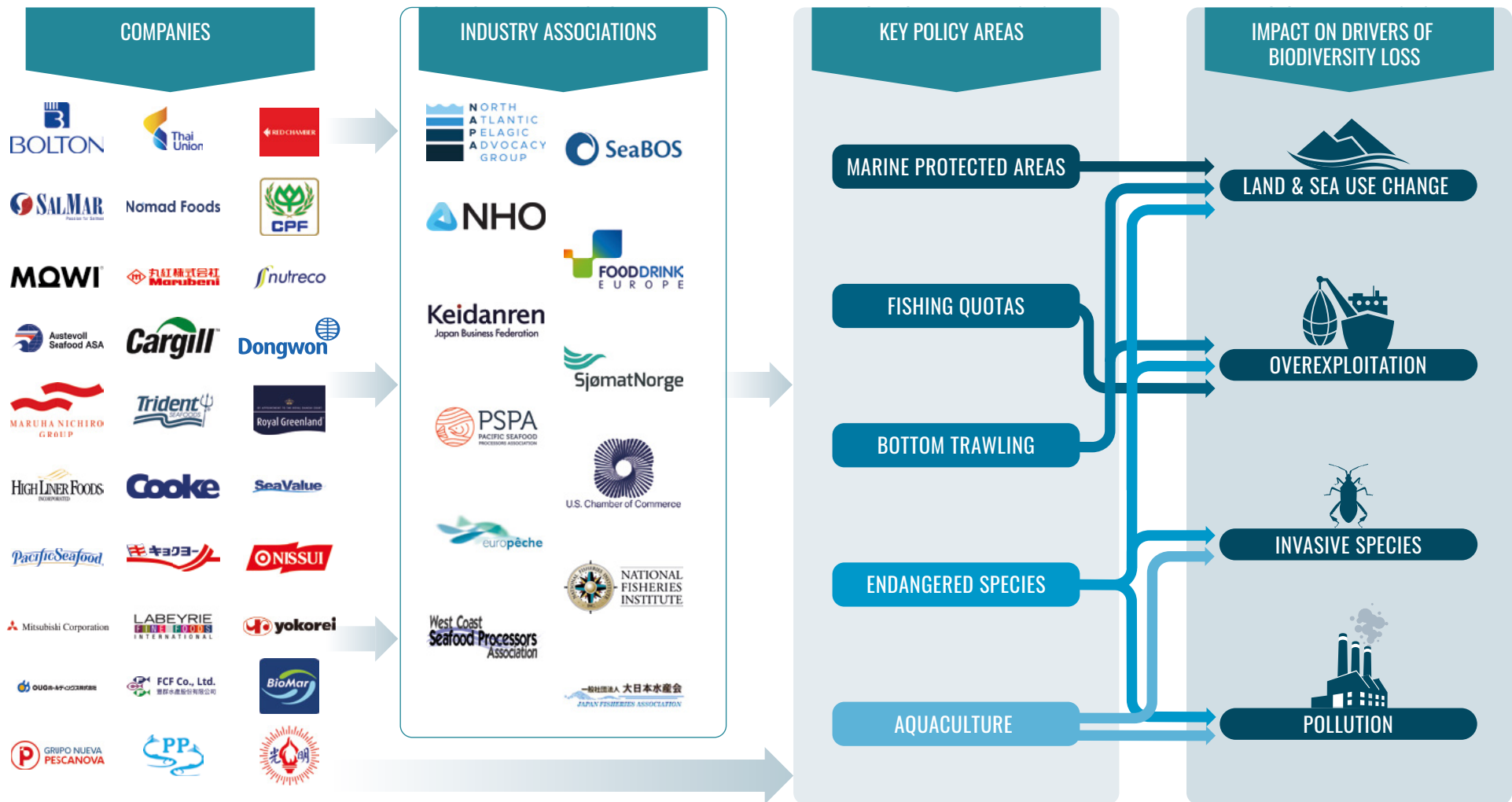
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Logos of organizations are occasionally utilized in the graphics associated with the analysis in this report, as is common practice in public facing releases of this kind. This in no way implies agreement and/or endorsement of the report's content by these entities.

Executive Summary

- The latest findings from the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) highlight alarming losses in marine biodiversity, primarily due to overexploitation and habitat destruction. This new research demonstrates that major companies and industry associations in the seafood sector are significantly prolonging this damage to ocean ecosystems by advocating against policy to address this issue.
- The research assessed the world's 30 most systemically important seafood companies on the Seafood Stewardship List developed by the World Benchmarking Alliance. Out of the 30 companies assessed, only one company, [Bolton Group](#) (Italy), has lobbying positions aligned with policy aiming to achieve the goals of the Kunming-Montreal Global Biodiversity Framework. Others are either partially or fully misaligned, and in many cases are actively opposing key areas of biodiversity-related policy. The most highly engaged companies, [Cargill](#) (US), [Mowi](#) (Norway), [Cooke](#) (Canada), [Nutreco](#) (Netherlands) and [Mitsubishi Corporation](#) (Japan), have interests throughout the aquaculture value chain. This high level of engagement is seen across policies impacting several drivers of biodiversity loss. These include regulations on aquaculture aimed at reducing pollution from facilities, managing the risks of invasive species and disease transmission, as well as policies targeting deforestation and overexploitation, which affect the availability of fish feed.
- There are clear contradictions between the sector's generally supportive public messaging on action to tackle biodiversity loss, and its largely oppositional engagement on specific regulations aimed at policymakers through meetings and consultations. Policies that have faced the greatest pushback are marine protected areas, restrictions on bottom trawling particularly in the US and EU, and aquaculture regulation. In other policy areas, for example fishing quotas and efforts to curb illegal, unreported and unregulated (IUU) fishing, there appears to be disagreement between different industry players with several examples of positive advocacy aimed at Regional Fisheries Management Organizations (RFMOs), but other examples of less positive engagement at the national policy level.
- Industry associations appear to be playing an active role in advocacy for the seafood sector. The analysis, of eight associations across five regions, demonstrates a large divide between a small number of positive advocacy groups ([North Atlantic Pelagic Advocacy Group](#), [SeaBOS](#)), and the remaining seafood industry associations (including [Europêche](#), [National Fisheries Institute](#)) that appear to have predominantly obstructive engagement on a wide range of policy areas. Despite this, companies' disclosure on their indirect engagement is poor. None of the 30 companies have published details on their industry associations' biodiversity policy positions, the groups' alignment with global biodiversity goals or any action taken to reform these positions.

Graphic 1: Seafood industry policy influence on biodiversity loss



Introduction

Biodiversity Loss and Corporate Influence

[Meta-analyses](#) of conservation scientists' views have shown that there is a scientific consensus that biodiversity loss due to human activity is occurring globally at [unprecedented rates and faster than at any other time in human history](#), with one million species regarded as threatened with extinction. As well as the destruction of biodiversity itself, this has dramatic implications for human health, prosperity and wellbeing. Sir Robert Watson, Chair of IPBES, has [described](#) the loss of biodiversity as “eroding the very foundations of our economies, livelihoods, food security, health and quality of life worldwide”. To reverse the loss of biodiversity, Sir Robert states that there is a need for **“fundamental, system-wide reorganization across technological, economic and social factors, including paradigms, goals and values.”** Effective government policy across nations will therefore be crucial in building a global sustainable economy and halting biodiversity loss.

However, initial research by InfluenceMap on this topic, our pilot study [Industry Influence on Biodiversity Policy](#) (2022), and our wider report [The Corporate Sector and Biodiversity Policy](#) (2023), indicates that crucial biodiversity policy is being held back and delayed by vested corporate interests, with very limited research or action to address this obstructive lobbying. This mirrors extensive [research](#) by InfluenceMap over the last decade on the impact of the corporate sector in obstructing climate policy globally.

Seafood Sector Impact on Biodiversity and Policy Response

The seafood sector, including both wild-capture fisheries and aquaculture, plays a significant role in driving biodiversity loss. Impacts from wild-capture fisheries, according to the 2019 IPBES [Global Assessment Report on Biodiversity and Ecosystem Services](#), include depleted fish populations as a result of overfishing, habitat destruction due to fishing methods such as bottom trawling, and threats to endangered marine life through capture of non-target species. The 2024 Food and Agriculture Organization of the United Nations (FAO) report [The State of the World Fisheries and Aquaculture](#) sets out several ways in which aquaculture can contribute to the biodiversity crisis. Poorly managed aquaculture operations can result in pollution, disease transmission, and the escape of farmed species, which can outcompete or interbreed with wild populations. Furthermore, the expansion of fish farming can lead to habitat degradation, such as mangrove deforestation.

The sector's impact and reliance on biodiversity has prompted a range of policy responses by governments, including fishing quotas, marine protected areas, restrictions on destructive fishing methods, regulations governing aquaculture and statutory protection for endangered species. This report assesses seafood company and industry associations' efforts to influence these policy processes.

Human activities have had a large and widespread impact on the world's oceans. These include direct exploitation, in particular overexploitation, of fish, shellfish and other organisms, land- and sea-based pollution, including from river networks, and land-/sea-use change, including coastal development for infrastructure and aquaculture. ([IPBES Global Assessment Report on Biodiversity and Ecosystem Services, 2019](#))

Methodology

InfluenceMap's methodology for assessing corporate engagement on biodiversity loss closely follows InfluenceMap's established methodology for assessing engagement on climate lobbying, the full details of which can be found [here](#).

Searching for Evidence on Biodiversity-Related Lobbying

InfluenceMap's methodology relies on the UN [2013 Guide for Responsible Corporate Engagement in Climate Policy](#). This document defines a list of corporate activities that constitute corporate climate engagement, ranging from advertising, social media, public relations, sponsoring research, direct contact with regulators and elected officials, funding of campaigns and political parties, and participation in policy advisory committees.

InfluenceMap's methodology searches for all publicly available, reliable evidence on corporate engagement. The methodology divides the data sources into the following seven categories:

- **Organizational websites:** The main organizational website of the company and its subsidiaries.
- **Corporate media:** Additional media communications controlled by the organization, including social media channels
- **CDP disclosures:** Any references to biodiversity-related policy engagement across the climate, forest and water questionnaires
- **Regulatory consultations:** Comments on regulatory consultation processes, including those obtained by InfluenceMap through Freedom of Information requests
- **Reliable media:** Reports of policy engagement by well-established media.
- **Management messaging:** Transcripts of statements by key executives of the entity under a variety of circumstances
- **Financial disclosures:** Investor-focused materials including investor call transcripts and regulatory filings.

While InfluenceMap's data sources cover a wide range of corporate policy engagement, the full extent of lobbying may not be evident in data sources available in the public domain. Nevertheless, InfluenceMap's ability to capture a significant number of evidence items across a range of publicly available data sources enables the creation of a robust reflection of an organization's activity and positioning.

Categorizing Lobbying on Biodiversity Loss

The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) outlines [five main direct drivers of biodiversity loss](#): **land-use change, climate change, pollution, overexploitation, and invasive species**. InfluenceMap has [an extensive platform](#) tracking corporate lobbying on climate change policy. Therefore, in addition to assessing high-level corporate messaging on the biodiversity crisis, this research aims to focus on corporate lobbying on policy and regulation on the other four main drivers. Additionally, there is a substantial body of legislation intended to protect rare and endangered species from a diverse range of threats that arguably spans multiple of the drivers listed above, i.e. the Endangered Species Act (USA). Legislation of this nature intended to address multiple threats by granting high-level protection to specific species is scored in an independent query.

The table below summarizes each of the biodiversity sub-issues, referred to as 'queries' in InfluenceMap's methodology, assessed for each organization. As well as high-level and policy queries, two final queries assess the quality of the companies' disclosures of their direct and indirect engagement.

Table 1: Queries used to assess corporate engagement on biodiversity policy

Query Type	Query
High-level policy issues	Does the entity transparently and fully accept the science showing unprecedented biodiversity loss?
	Does the entity accept the need for drastic action to reverse the loss of biodiversity?
	Does the entity support the need for government policy to respond to the biodiversity crisis?
	Does the entity support the UN Convention on Biological Diversity ?
Policy and regulation addressing drivers of biodiversity loss	Does the entity support legislative and regulatory measures to reduce biodiversity loss due to land use change ?
	Does the entity support legislative and regulatory measures to reduce biodiversity loss due to unsustainable exploitation of natural resources?
	Does the entity support legislative and regulatory measures to reduce biodiversity loss due to invasive non-native species or infectious disease?
	Does the entity support legislative and regulatory measures to reduce biodiversity loss due to pollution ?
Statutory protection of species policy	Does the entity support legislative and regulatory measures giving statutory protection to threatened wildlife and plants?
Disclosure	Is the entity being transparent about their positions on legislation and policy intended to reduce biodiversity loss?
	Is the entity being transparent about their industry association memberships, including the positions taken by industry associations on legislation and policy intended to reduce biodiversity loss?

InfluenceMap's Metrics

The research process described above can generate hundreds of evidence pieces, all of which are stored in InfluenceMap's data-content management system. InfluenceMap's scoring process is policy neutral. It does not assess the quality of governmental policy but rather the positions of companies and industry associations relative to this policy. This is achieved by using the statements and ambitions of government-mandated bodies against which policy positions are scored. These benchmarks are supplemented with the findings and recommendations of the [IPBES](#), the main scientific body for biodiversity, to assess corporate positions which lie outside of policy debates.

Scored evidence is coded by InfluenceMap as 'strongly supporting,' 'supporting,' 'no position/mixed position,' 'not supporting/supporting with exceptions,' or 'opposing' with reference to the 11 queries explained above. These categories correspond to a numerical five-point scale between +2 and -2, where +2 indicates strong support and -2 indicates opposition. For this research, evidence was collected dating back to 2020, with the most recent evidence carrying the most weight. InfluenceMap's data-content management system calculates four core metrics from the scored evidence with weightings to factor in the relative importance of the different data sources and queries. These metrics are:

- **The Organization Score** (0 to 100%) indicates how supportive or opposed an organization is toward biodiversity policy. Scores below 50 indicate increasing opposition toward biodiversity-related policy. Where very limited direct engagement was found, the Organization Score is denoted as N/A.
- **The Engagement Intensity** (0 to 100%) indicates the intensity of this engagement activity, whether supportive of or oppositional to biodiversity policy. Engagement Intensities above 25% indicate strategic engagement across a range of policy areas, with an engagement intensity above 12% indicating strategic engagement across a smaller range of policy areas or some engagement across a range of policy areas.
- **The Relationship Score** (0 to 100%) measures how supportive or opposed the aggregate of a company's industry associations are toward policy (companies only). Where only a limited number of relationships were found, the Relationship Score is denoted as N/A.
- The Organization Score and the Relationship Score combine to form the **Performance Band** (A to F) which represents the full measure of a company's direct and indirect engagement. Grades from A+ to B (i.e. above 75%) indicate broad support for science-aligned biodiversity policy, while grades from D to F (i.e. below 50%) indicate increasingly misaligned biodiversity-related policy engagement.

Selection of Companies and Industry Associations

This research focuses on the world's 30 most influential companies in the seafood industry, as defined in the [Seafood Stewardship Index](#) developed by the World Benchmarking Alliance. This includes companies involved in fishing, aquaculture, seafood processing, seafood branding, and aquaculture feed production. Companies have been assessed on all aspects of their biodiversity-related policy engagement, and therefore this assessment includes areas unrelated to seafood where companies are also operating in other sectors.

Industry associations have been selected to ensure key sector coverage for the regions where the majority of companies are headquartered. Additional links have been determined between some of the seafood companies and cross-sector associations. InfluenceMap plans to expand its universe of industry associations in 2025.

For companies headquartered in Thailand, China and Taiwan, InfluenceMap's LobbyMap platform can currently only make a provisional assessment of corporate biodiversity policy engagement, due to limited capability to access publicly available data on this issue. As it is possible that InfluenceMap is not yet able to fully capture evidence of biodiversity policy engagement activities, these scores should be considered provisional at this time.

Summary of Findings

There is wide variation in companies' political engagement on biodiversity-related policy

The companies assessed have varied engagement on policy intending to reduce and reverse the biodiversity crisis, with a wide range of scores across both direct and indirect engagement.

- Only **Bolton Group** has advocacy that appears to be aligned with science-aligned biodiversity policy, indicated by a Performance Band between A+ and B¹. **13 companies** have advocacy that is partially aligned with science-aligned policy, indicated by Performance Bands between B- and D+. **Nine companies** have engagement that is misaligned. The remaining **seven companies** have limited transparent direct and indirect engagement, and therefore a Performance Band has not been computed.
- Overall, Engagement Intensities are low, indicating that companies are not individually highly engaged across several policy areas relevant to biodiversity loss. 12 companies have an Engagement Intensity below 5%, which indicates very limited transparent direct engagement. **Cargill** has the highest Engagement Intensity among the companies, at 17%, which is driven by engagement across multiple policy areas including deforestation, overfishing, invasive species, and pollution. Other companies with relatively high Engagement Intensities include **Mowi** (15%), **Cooke** (13%), **Nutreco** (12%) and **Mitsubishi** (12%). All five of these companies are involved in aquaculture, reflected in their engagement on related policy which impacts a number of drivers of biodiversity loss (see more detail on p24-25).
- In general, European companies have the most positive policy engagement, with an average Performance Band of C. Companies headquartered in Asia have an average Performance Band of D+, while US companies are, on average, the most obstructive to science-aligned policy with an average Performance Band of E+.

The table below shows the results for the 30 companies, with links to their online profiles where all the evidence used in the assessment can be accessed.

¹ While Bolton Group did perform better than other companies, it is worth noting the 9% Engagement Intensity is a low level of publicly available evidence of its engagement activities. It also only has one membership to the industry associations covered in this analysis.

Table 2: Company results

Company	Headquarters	Performance Band	Organization Score	Relationship Score	Engagement Intensity
Bolton Group	Italy	B	75%	NA	9%
Thai Union	Thailand	B-	72%	63%	10%
BioMar	Denmark	C+	NA	60%	4%
Nomad Foods	United Kingdom	C	61%	NA	7%
FCF Co., Ltd.	Taiwan	C	65%	NA	6%
Nutreco	Netherlands	C	63%	63%	12%
Nueva Pescanova	Spain	C	64%	NA	5%
Parlevliet & Van der Plas	Netherlands	C-	61%	NA	5%
Mowi	Norway	C-	59%	61%	15%
Charoen Pokphand Foods (CPF)	Thailand	D+	NA	71%	4%
Kyokuyo	Japan	D+	NA	62%	2%
Maruha Nichiro	Japan	D+	NA	57%	2%
Marubeni	United States	D+	NA	51%	1%
SalMar	Norway	D+	49%	53%	6%
Cargill	United States	D	46%	56%	17%
Austevoll Seafood	Norway	D	49%	47%	7%

Mitsubishi Corporation	Japan	D-	41%	58%	12%
High Liner Foods	Canada	D-	45%	NA	5%
Dongwon Industries	South Korea	D-	40%	58%	5%
Trident Seafoods	United States	D-	45%	33%	8%
Nissui	Japan	D-	43%	41%	5%
Pacific Seafood	United States	E	35%	24%	5%
Cooke	Canada	F	19%	47%	13%
Royal Greenland	Greenland	NA	NA	NA	4%
Labeyrie Fine Foods	France	NA	NA	NA	3%
Wales Group (Sea Value & Sea Wealth)	Thailand	NA	NA	NA	3%
Bright Food	China	NA	NA	NA	1%
OUG Holdings	Japan	NA	NA	NA	0%
Red Chamber	United States	NA	NA	NA	0%
YOKOREI	Japan	NA	NA	NA	0%

As seen in Table 2, companies also have a range of Relationship Scores, which reflect their engagement through industry associations. InfluenceMap has [long tracked](#) the critical role third-party groups play in shaping policy outcomes by allowing members to pool resources and take advantage of well-resourced lobbying operations as well as providing public distance between members and the trade groups' most obstructive policy positions. Table 3 displays InfluenceMap's assessment of industry associations representing the 30 seafood companies, with members listed in the righthand column.

Table 3: Industry association results

Industry Association	Region	Sector	Performance Band	Engagement Intensity	Company Members
North Atlantic Pelagic Advocacy Group	Global	Fisheries	A-	11%	BioMar, Bolton Group, Northeast Nutrition (subsidiary of Cargill), Cooke, Labeyrie Fine Foods, Mowi, Skretting (subsidiary of Nutreco), Thai Union Group
SeaBOS	Global	Fisheries	B-	12%	Cargill, Charoen Pokphand Foods (CPF), Dongwon Industries, Kyokuyo, Maruha Nichiro, Cermaq (subsidiary of Mitsubishi Corporation), Nissui, Nutreco, Thai Union Group
Confederation of Norwegian Enterprise	Norway	All Sectors	C	7%	Austevoll Seafood, Mowi, SalMar
FoodDrinkEurope	EU	Consumer Staples	C-	21%	Cargill, Nomad Foods
Japan Business Federation (Keidanren)	Japan	All Sectors	D+	11%	Kyokuyo, Marubeni, Maruha Nichiro, Mitsubishi Corporation, Nissui
Sjomat Norge	Norway	Fisheries	D	15%	Austevoll Seafood, BioMar, Mowi, Nutreco, SalMar
Pacific Seafood Processors Association	United States	Fisheries	D-	13%	Alyeska Seafoods and Westward Seafoods (subsidiaries of Maruha Nichiro), UniSea (subsidiary of Nissui), Trident Seafoods
US Chamber of Commerce	United States	All Sectors	E	22%	Cargill
Europêche	EU	Fisheries	E-	27%	Parlevliet & Van der Plas
National Fisheries Institute	United States	Fisheries	E-	18%	Leroy Seafood (subsidiary of Austevoll Seafood), Cargill, Cooke, StarKist (subsidiary of Dongwon Industries), Bumble Bee Foods (subsidiary of FCF Co), High Liner Foods, Nissui, Nueva Pescanova, Pacific Seafood, Red Chamber, Royal Greenland, Thai Union Group
West Coast Seafood Processors Association	United States	Fisheries	F	9%	Pacific Seafood, Trident Seafoods
Japan Fisheries Association	Japan	Fisheries	N/A	1%	Kyokuyo, Maruha Nichiro, Nissui



■ There is a clear split in the results for the industry associations directly representing the seafood sector on fisheries-related issues between two supportive groups, the [North Atlantic Pelagic Advocacy Group](#) (A-) and [SeaBOS](#) (B-), and the remaining five seafood specific associations, which all score D or below, indicating opposition to science-aligned policy. Not enough transparent information could be found for the [Japan Fisheries Association](#) to produce a score. While the former groups have been outspoken on issues such as overfishing (see p21-22), the latter groups appear to be more highly engaged and have advocated to delay and weaken policies on overfishing (see p21-22), marine protected areas (see p18-19), bottom trawling (see p20) and endangered species (see p26-27).

■ 10 companies (33%) are members of broader consumer staples or cross-sector industry associations, such as the [US Chamber of Commerce](#), [Keidanren](#), and [FoodDrinkEurope](#). These groups have engaged on a wider range of biodiversity-related policies across multiple drivers of biodiversity loss. Previous InfluenceMap [research](#) has demonstrated the power of influential cross-sector groups in delaying and opposing both climate and biodiversity policy. Cross-sector associations can claim to speak on behalf of the entire economy, even when they may not represent the true diversity of company views, significantly strengthening arguments that highlight risks to 'jobs and growth' to counter regulatory threats.

Analysis of High-Level Messaging

This section highlights the seafood sector's top-line messaging on the science of biodiversity loss, addressing the biodiversity crisis and the need for government intervention.

High-level messaging from the 30 companies on the biodiversity crisis was limited but mostly positive.

- Only four companies (Mowi, Bolton Group, Thai Union Group, and Charoen Pokphand Foods) have at least one transparent position that clearly covers the science of biodiversity loss. A further 16 have positions that cover some of the science of biodiversity loss, for example by referring only to limited drivers of biodiversity loss or not explicitly acknowledging that biodiversity loss is due to human activity. The remaining 10 companies either only describe the importance of biodiversity without referring to the fact it is decreasing, or do not have a public position at all.
- While a narrow majority (53%) acknowledge the impact of overfishing as a driver of biodiversity loss, there are several instances where companies appear to emphasize the importance of other factors in driving biodiversity loss in the oceans, particularly ocean plastics, and particularly in external facing materials such as press releases and on social media. Although the IPBES is clear that direct exploitation is the leading cause of biodiversity loss in the oceans, followed by sea-use change, six companies (BioMar, Charoen Pokphand Foods, Dongwon Industries, Pacific Seafood, Parlevliet & Van der Plas, SalMar) have focused on the impact of plastics on the oceans without referring to the impact of overfishing. Additionally, Thai Union emphasizes the impact of plastics and broader marine pollution (including by holidaymakers) in some of its external materials, although has separately described the threat of overfishing.

- 14 companies have stated at least broad support for addressing biodiversity loss. A further eight have expressed support for conservation, or maintaining the marine environment without indicating a need to reverse the current trend of biodiversity loss, with the remaining companies not providing a public position on the need for action on biodiversity loss. Only four companies have explicitly expressed support for the Kunming-Montreal Global Biodiversity Framework (Mowi, Bolton Group, Thai Union Group and Charoen Pokphand Foods). These are the same companies that had a clear position on the science of biodiversity loss.
- 12 companies have top-line messaging that is broadly aligned with their engagement on policy. However, a further 12 companies have top-line messaging that is significantly more positive than their detailed policy engagement. In some cases, this is driven by high-level support for action on biodiversity loss by parent companies appearing to be misaligned from the detailed policy engagement being undertaken by subsidiaries, often in different geographies. The remaining six companies have no high-level and/or policy engagement.

Table 4 highlights apparent disconnects between companies' high-level messaging on biodiversity loss, often communicated in annual reports, and their detailed policy positions, generally direct communications to policymakers.

Table 4: Contrast between companies' high-level messaging and policy engagement

Company	Example of high-level messaging	Example of policy engagement
Trident Seafoods	The urgency and scale of these challenges requires collective action, a commitment to science based management practices, and an investment in technology and practices that increase efficiency and reduce the impact of our own fishing operations. (Trident Seafoods, 2023 ESG Report)	Opposing US bill to improve the sustainable management of fisheries Unfortunately, despite what may be the best of intentions, as currently drafted H.R. 4690, the Sustaining America's Fisheries for the Future Act, poses significant risks to our world-leading federal fisheries management system. (Testimony by Trident Seafoods to the US Committee on Natural Resources, 2021)
Mowi	To reverse the rapid decline in biodiversity and restore natural ecosystems there is an urgent need to transform and change the way we use and manage nature today. (Mowi, 2023 Annual Report)	Not supporting measures in Scotland to reduce the impact of salmon farming on wild fish A game is being played by the wild fish sector and the activists to make the model architecture as ultra-precautionary possible, so that it prevents farming in certain locations. Personally, I do not think that it is wise to get into that situation. (Mowi Scotland comments to the Scottish Parliament's Rural Affairs and Islands Committee, 2024)
Maruha Nichiro	As one of three Japanese member companies, Maruha Nichiro is in a favourable position to lobby for greater change in the country. "We recognize that communicating SeaBOS's goals to local governments and industry associations is an important mission for us as a member company." (Quote from Maruha Nichiro on SeaBOS's website, 2022)	Opposing '30 x 30 target' under the US Ocean-Based Climate Solutions Act Title II would compel the Executive Branch to establish Marine Protected Areas (MPAs) that prohibit all commercial fishing activity across at least 30 percent of the nation's Exclusive Economic Zone (EEZ) by 2030. One of the central claims made by Title II supporters is that these massive closures would provide benefits to fishermen and other seafood industry participants over the long term. That simply isn't true. (Joint letter to Chairman Grijalva of the US House of Representatives' Committee on Natural Resources signed by Maruha Nichiro subsidiaries Alyska Seafoods and Westward Seafood, 2020)
Royal Greenland	Fishing for wild species is deemed to concern a renewable, but limited, resource, and there can be a risk that environmental impacts, as well as excessive fishing, can affect a given stock. (Royal Greenland, 2023 Annual Report)	Not supporting Greenland fishing quotas Royal Greenland, the world's largest supplier of coldwater shrimp and Greenland halibut, is warning of potentially "devastating" consequences if it has its quota capped under Greenland's proposed new fishing law. (Intrafish, comments by Royal Greenland Chairman, 2024)

Mitsubishi Corporation	As stated in our Environmental Charter, MC recognizes the critical importance of natural capital, including biodiversity, and is committed to maintaining, protecting, and restoring it. (Mitsubishi Corporation website, 2024)	Opposing decision in Canada not to renew salmon aquaculture licenses 'The most crazy decision I have seen in the history of the global salmon industry': Cermaq CEO slams Canada's BC salmon license ruling. Steven Rafferty said he was shocked by the 'flawed and wrong decision' not to renew licenses in the Discovery Islands. (Intrafish, comments by CEO of Mitsubishi Corporation subsidiary Cermaq, 2023)
Nissui	Given the Nissui Group's high dependence on natural capital, themes related to environmental value are critical in terms of both risks and opportunities, and we need to maintain a sense of crisis in our approach to them. (Nissui, 'Message from the President', 2022)	Not supporting updating the US Magnuson-Stevens Act For this reason, we ask that you reconsider the scale and speed of what is proposed, and ensure that any guideline revisions, if undertaken, allow for the kind of focused, deliberative and collaborative process that will strengthen our management system and the individuals and communities that rely on it. (Coalition comments to the US NOAA signed by Nissui subsidiary UniSea, 2023)
Pacific Seafood	To ensure stocks are sustainable long into the future, Pacific Seafood works with the NOAA Fisheries Science Centers, the NOAA Fisheries Policy Division, Regional Fishery Councils, and several state environmental departments, including Fish and Wildlife. (Pacific Seafood, 2022 CSR Report)	Opposing '30 x 30 target' under the US Ocean-Based Climate Solutions Act Title II would compel the Executive Branch to establish Marine Protected Areas (MPAs) that prohibit all commercial fishing activity across at least 30 percent of the nation's Exclusive Economic Zone (EEZ) by 2030. One of the central claims made by Title II supporters is that these massive closures would provide benefits to fishermen and other seafood industry participants over the long term. That simply isn't true. (Joint letter to Chairman Grijalva of the US House of Representatives' Committee on Natural Resources signed by Pacific Seafood, 2020)

The following sections highlight engagement on critical policy areas for mitigating the seafood sector's impact on biodiversity loss. While companies are often nominally supportive of these policy areas, the in-depth assessment reveals numerous examples of seafood companies and their associations advocating to weaken and obstruct vital policy. Across the seafood companies and industry associations², only **13%** of broad policy statements, generally found in corporate reporting, were unsupportive or oppositional (for example a general position on marine protected areas), compared to **55%** of engagement on specific policies (for example a position on a specific policy on marine protected areas).

The infographic is divided into four main sections, each with a teal header, connected by a large teal arrow pointing from left to right.

- COMPANIES:** This section lists various companies in two rows. The first row includes Bolton, Thai Union, and West Colden. The second row includes SalMar, Nomad Foods, CPF, MQWI, F&L Food Systems, Nutreco, Austevoll Seafood ASA, Cargill, Dongwon, Maruha Nichiro Group, Trident, Royal Greenland, High Line Foods, Cooke, SeaValue, Pacific Seafood, Kikkoman, Onissui, Mitsubishi Corporation, Labeyrie, Yokorei, Otsu-o Co., Ltd., and BimBerry.
- INDUSTRY ASSOCIATIONS:** This section lists various industry associations in two rows. The first row includes North Atlantic Pelagic Advocacy Group, SeaBOS, NHO, FoodDrink Europe, Keidanren, and Sjømat Norge. The second row includes PSPA, U.S. Chamber of Commerce, Europêche, National Fisheries Institute, West Coast Seafood Processors Association, and Nippon Seafood Association.
- KEY POLICY AREAS:** This section lists five key policy areas in teal boxes: Marine Protected Areas, Fishing Quotas, Bottom Trawling, Endangered Species, and Aquaculture.
- IMPACT ON DRIVERS OF BIODIVERSITY LOSS:** This section shows the impact of the key policy areas on four drivers of biodiversity loss, each represented by an icon and a teal box: Land & Sea Use Change (mountain icon), Overexploitation (ship icon), Invasive Species (insect icon), and Pollution (factory icon).

Arrows indicate the flow of influence: from Companies to Industry Associations, from Industry Associations to Key Policy Areas, and from Key Policy Areas to the Impact on Drivers of Biodiversity Loss.

2 *i.e. excluding cross-sector associations*

Marine Protected Areas

FACT FILE



LAND AND SEA USE

Relevance to biodiversity loss

“Marine protected areas have demonstrated success in both biodiversity conservation and improved local quality of life when managed effectively and can be further expanded through larger or more interconnected protected areas or new protected areas in currently underrepresented regions and key biodiversity areas” (IPBES Global Assessment Report, 2019)

Marine protected areas (MPAs) are regions of the ocean where human activities are restricted or banned, preventing habitat change.

OVERALL ENGAGEMENT

Level:

Medium

Position:

Oppositional

Companies and industry associations assessed in this report have had a moderate level of engagement on marine protected areas, with largely unsupportive positions. While a few companies, such as [Bolton Group](#) and [Charoen Pokphand Foods \(CPF\)](#), have stated broad support for the “30x30” goal under the Global Biodiversity Framework, most engagement to implement this target has been oppositional. Efforts to obstruct the creation or expansion of marine protected areas have largely been focused on the implementation of the “30x30” goal in the EU (under the 2030 Biodiversity Strategy), the US (under the ‘America the Beautiful’ initiative) and, to a more limited extent, Japan.



EU

- **Europêche** has consistently advocated against the expansion of marine protected areas in the EU. In a July 2021 [press release](#), Europêche described how it met with the Director General of DG MARE and “objected against setting unrealistic and very harmful objectives, such as fencing off 30% of EU seas as Marine Protected Areas (MPAs)”. In a 2024 [press release](#), Europêche raised concerns with UK marine protected areas and encouraged the European Commission to take action to protect EU fishing vessel access.

Japan

- In a [meeting](#) held by the Japanese Ministry of the Environment in December 2021, **Keidanren** advocated for flexibility and a reduction in administrative burden for the “30x30” target.

US

- In November 2020, **Trident Seafoods**, **Pacific Seafood**, **UniSea** (subsidiary of Nissui), **Alyeska Seafoods** (subsidiary of Maruha Nichiro), **Westward Seafood** (subsidiary of Maruha Nichiro), **Omega Protein** (subsidiary of Cooke), **Icicle Seafoods** (subsidiary of Cooke), **West Coast Seafood Processors Association (WCSPA)**, **Pacific Seafood Processors Association (PSPA)** and **National Fisheries Institute** signed a [joint letter](#) opposing the “30x30” target under the Ocean-Based Climate Solutions Act.
- Additional engagement on the “30x30” goal in the US includes **Trident** CEO Joe Bundrant stating opposition to the policy in a 2020 [interview](#) with the Washington Times and former **National Fisheries Institute** president Jim Connelly [reportedly](#) supporting weakening the target in a briefing to the Northeast Atlantic Seafood Forum in June 2021.
- There has also been engagement by the companies and industry associations assessed on specific marine protected areas in the US. In 2022 [comments](#) to the US National Oceanic and Atmospheric Administration (NOAA) in May 2023, **StarKist** (subsidiary of Dongwon Industries) opposed the expansion of the Pacific Remote Islands Marine National Monument, a national marine sanctuary. In [comments](#) to the National Oceanic and Atmospheric Association, **West Coast Seafood Processors Association (WCSPA)** advocated to narrow the size of the proposed Chumash Heritage National Marine Sanctuary off the coast of California. In December 2022, **Pacific Seafood Processors Association (PSPA)** opposed the emergency closure of the Red King Crab Savings Area and Subarea to fishing in [comments](#) to the National Marine Fisheries Service.

Restrictions on Bottom Trawling

FACT FILE	
 LAND AND SEA USE	 OVEREXPLOITATION
Relevance to biodiversity loss “Anthropogenic damage in the deep sea is less than in shallow waters and on land but is increasing rapidly. A severe impact is bottom trawling” (IPBES Global Assessment Report, 2019) Bottom trawling uses towed nets to catch fish and other marine species living on or close to the seabed. If not carefully managed, bottom trawling can cause direct damage to habitats and organisms found at the seabed, and is also associated with large quantities of by-catch (capture of non-target species) which can contribute to overexploitation of species.	
OVERALL ENGAGEMENT	
Level:	Position:
Low	Oppositional

Only industry associations assessed in this report appear to have directly engaged on policy relating to bottom trawling, but where they have engaged it has been oppositional to policy aimed at restrictions on this often-destructive fishing method.

US

- In June 2024, the **National Fisheries Institute**, **West Coast Seafood Processors Association** and **Pacific Seafood Processors Association** signed a [joint letter](#) opposing the Bottom Trawl Clarity Act, which would restrict areas where bottom trawling is allowed. In a [press release](#) on the policy also in June 2024, **National Fisheries Institute** President Lisa Walled Picard described the policy as “ideological hostility to certain harvesting methods”.

EU

- Europêche** has been vocal in its opposition to the proposed phase-out of bottom trawling in the EU. In a May 2021 [consultation response](#), **Europêche** opposed the phasing out of bottom trawling, stating “Bottom trawling is the only viable way to catch many key species”. Furthermore, in a 2022 [joint statement](#), **Europêche** stated concern “about the ongoing demonization and attacks against bottom contacting fishing gears”.

Fishing Quotas

FACT FILE	
 OVEREXPLOITATION	
Relevance to biodiversity loss “In marine ecosystems, direct exploitation of organisms (mainly fishing) has had the largest relative impact” (IPBES Global Assessment Report, 2019) Fishing quotas are regulatory limits on the quantity of fish that can be caught in an area, set to avoid the overexploitation of species.	
OVERALL ENGAGEMENT	
Level:	Position:
High	Mixed

Fishing quotas is the policy area with the highest level of engagement and the most positive, with a mix of positive and negative taken by the companies and industry associations assessed. Engagement aimed at Regional Fisheries Management Organizations (RFMOs) among the entities assessed was largely positive, while more obstructive engagement was picked up when directed at specific countries.

North-East Atlantic Fisheries Commission (NEAFC)

- **North Atlantic Pelagic Advocacy Group (NAPA)**'s advocacy is focused on policy intended to limit biodiversity loss due to overexploitation, and specifically on advocating extensively for Coastal States to manage stocks of North East Atlantic mackerel, Atlanto-Scandian herring, and North East Atlantic blue whiting in line with scientific advice. This includes through [positions](#) on their website, accessed in October 2024, a [position statement](#) in advance of the meeting of the NEAFC in 2023, an [open letter](#) to the Norwegian Government in 2024 and numerous [blog posts](#) and [media articles](#) in 2021-2024.
- Several individual companies have also advocated for the NEAFC to set stringent quotas. In a [sourcing statement](#), accessed October 2024, **Bolton Group** called for the NEAFC to align its quotas with scientific advice. According to [reporting](#) by Seafood Source in 2023, **Cargill**, **Skretting** (subsidiary of Nutreco), **Mowi** and **BioMar** advocated for the total allowable catch (TAC) for the North Atlantic blue whiting to be reduced in line with scientific advice.

Indian Ocean Tuna Commission (IOTC)

- On **Starkist's** (subsidiary of Dongwon) [website](#), accessed in 2024, it advocates for the Indian Ocean Tuna Commission (IOTC) to align catches with scientific advice. Additionally, **Bolton Group** advocated for the IOTC to set catch limits aligned with scientific advice in a 2023 [statement](#).

US

- Coalition [comments](#) to the National Oceanic and Atmospheric Administration (NOAA) in 2023, signed by **UniSea** (subsidiary of Nissui), **Westward Seafood** (subsidiary of Maruha Nichiro), **National Fisheries Institute**, **Pacific Seafood Processors Association** and **West Coast Seafood Processors Association (WCSPA)**, did not appear to support updating the Magnuson-Stevens Act to better account for climate change and environmental justice issues when setting allocations and by-catch rules.

EU

- **Europêche** has taken both positive and negative positions on fishing quotas. In a June 2024 [press release](#), Europêche advocated for EU policymakers to take action against excessive catch quotas on Northeast Atlantic mackerel. However, Europêche appeared not to support the European Commission's decision on anchovy quotas in a September 2024 [press release](#), advocating for a greater consideration of social and economic factors in decision making, and opposed more stringent quotas in the Baltic Sea in a September 2024 [post on X](#).

Greenland

- In 2024 [comments](#) reported by Intrafish, **Royal Greenland** opposed planned revisions of the Greenland Fisheries Act, which would subject Royal Greenland to stricter fishing quotas that match the private sector.

Norway

- Sjømat Norge appears to support fishing quotas. In a November 2021 [consultation response](#), **Sjømat Norge** supported a trial introduction of rolling multiannual transferable quotas (MTBs) to assess the effectiveness of the proposal to limit overfishing. It also supported an agreement between Norway and Russia to limit fishing quotas in the Barents Sea in an October 2024 [press release](#).



Curbing Illegal, Unreported and Unregulated (IUU) Fishing

FACT FILE	
 OVEREXPLOITATION	
	Relevance to biodiversity loss “It is important to enhance capacity-building for the adoption of best fisheries management practices; adopt measures to promote conservation financing and corporate social responsibility; develop new legal and binding instruments; implement and enforce global agreements for responsible fisheries; and urgently take all steps necessary to prevent, deter and eliminate illegal, unreported and unregulated fishing.” (IPBES Global Assessment Report, 2019) Regulatory efforts to reduce IUU fishing are generally aimed at reducing the risk of overexploitation of species.
OVERALL ENGAGEMENT	
Level:	Position:
Medium	Mixed

The seafood sector has taken a range of positions on different measures to curb illegal, unreported and unregulated (IUU) fishing. While there has been significant pushback among the entities assessed to the expansion of the US Seafood Import Monitoring Program (SIMP), a traceability program to combat IUU fishing, several companies and associations have supported action in other contexts.

US

- **The National Fisheries Institute (NFI)** has strongly opposed the SIMP expansion to a wider number of species, including in [comments](#) to the National Oceanic and Atmospheric Administration (NOAA) in April 2023 and several [media reports](#) from 2022-23.
- **The Pacific Seafood Processors Association (PSPA)** has consistently opposed SIMP expansion, for example in [comments](#) to the Environmental Protection Agency (EPA) in 2023. In a [letter](#) to the United States Trade Representative in 2021, PSPA stated the expansion was “inspiring some countries to respond in kind, with requests for equally burdensome and unrealistic requirements”.
- In a [joint letter](#) to US Senators in 2021, the **West Coast Seafood Processors Association (WCSPA)** opposed SIMP expansion.
- In April 2023, **Slade Gorton** (Cooke subsidiary) submitted a [comment](#) to the National Oceanic and Atmospheric Administration opposing the expansion of the SIMP.
- Conversely, in March 2023, **Bumble Bee** (FCF subsidiary) submitted [comments](#) supporting the National Marine Fisheries Services’ (NMFS) proposed rule to add species and amend the SIMP.

South Pacific Regional Fisheries Management Organization

- **High Liner Foods** was a signatory to a [joint letter](#) in January 2024 urging the South Pacific Regional Fisheries Management Organization to increase efforts to curb IUU fishing.

Global

- In its 2017-2022 [Progress Report](#), **SeaBOS** confirms that it “has engaged in multiple policy processes directly relevant to addressing IUU fishing”, such as an appeal to G20 governments that called for an FAO Agreement on Port State Measures to combat IUU fishing

Aquaculture Regulation

FACT FILE		
		
INVASIVE SPECIES	POLLUTION	
Relevance to biodiversity loss “Aquaculture also contributes to coastal habitat destruction via both wastes (nutrients, feces, antibiotics) disposal and introduction of invasive alien species and pathogens. Aquaculture also contributes to further depleting fish stocks, due to the large fish meal and fish oil requirements” (IPBES Global Assessment Report, 2019) Regulations on aquaculture aim to reduce the sector’s impact on biodiversity, primarily by addressing pollution from aquaculture facilities and the risks of invasive species and disease transmission. Secondary impacts include habitat conversion for aquaculture operations and the risks to wild fish stocks and land use change due to the need for fish feed.		
OVERALL ENGAGEMENT		
Level:	Position:	
Medium	Oppositional	

Several aquaculture companies, as well as seafood associations, have engaged on policies regulating the aquaculture industry. Most of the engagement has been negative, with entities attempting to weaken policies and pushing back on restrictions on aquaculture. This has included efforts to challenge and weaken regulations in Norway, as well as push back to plans to phase out aquaculture in Canadian and US states.

Norway

- Mowi has taken legal action in Norway, where it was part of a 2021 [lawsuit](#) challenging the introduction of a “traffic light system” within the Aquaculture Act, which limits regional production based on sea lice volumes. In 2020, **Leroy Seafood** (subsidiary of Austevoll Seafood) [reported](#) its involvement in a lawsuit against the Norwegian Government on similar grounds.
- In a 2023 [consultation response](#) to the Norwegian government regarding aquaculture management, **Sjømat Norge** suggested amendments to Norway’s “traffic light system” that would prioritize socio-economic factors, weakening the policy’s ability to protect wild fish populations from invasive sea lice. **SalMar** has also appeared to question the effectiveness of the system, with its CEO Gustav Witzoe stating in a 2023 [article](#) that “it has not been scientifically proven that the levels that have been set are correct”.

United Kingdom

- In an October 2024 meeting of the Scottish Parliament’s Rural Affairs and Islands Committee on an inquiry into salmon farming, a representative of **Mowi Scotland** appeared to downplay the impacts of salmon farming on [pollution](#) and [wild fish](#).

Canada

- **Mowi** and **Cermaq** (subsidiary of Mitsubishi Corporation) were part of a 2023 [legal dispute](#) in Canada regarding the non-renewal of fish farm licenses in the Discovery Islands, a decision made to reduce the spread of disease in wild populations of salmon. In February 2023, IntraFish further [reported](#) on Cermaq’s opposition to the Canadian Government’s decision not to renew salmon aquaculture licenses in the Discovery Islands, with its CEO stating it was “the most crazy decision I have seen in the history of the global salmon industry”.
- According to [reporting](#) by Seafood Source in 2023, **Cooke** CEO Glenn Cooke described the decision by Fisheries and Oceans Canada (DFO) to limit or eliminate net-pen salmon farming in British Columbia as “horrendous”. In a 2024 [press release](#), **Cermaq** also opposed the ban. **Mowi** and **Skretting** (subsidiary of Nutreco) joined protests opposing the policy in September 2024, according to [reporting](#) in Intrafish.



United States

- A 2023 [IntraFish article](#) disclosed that **Skretting** (subsidiary of Nutreco) and **Cooke** opposed a bill in Maine that intended to limit pollution from land-based aquaculture.
- In a November 2022 [press release](#), **Cooke** stated that it was opposing an executive order in Washington to prohibit net-pen aquaculture on state-owned aquatic lands, a decision taken primarily to reduce the risk of pollution and escape of non-native species. **The National Fisheries Institute** also opposed the cancellation of specific net-pen leases in November 2022, according to [reporting](#) by Seafood Source.
- According to its [2020 Sustainability Report](#) and [reporting by Seafood Source](#) in 2021, **High Liner Foods** advocated in favor of the US AQUAA Act, which would risk enabling offshore aquaculture in US federal waters without clear environmental safeguards to prevent the release of non-native species and pollution. **Pacific Seafood** also advocated in favor of the act according to its [2020 CSR Report](#). In 2020, [IntraFish reported](#) that **Pacific Seafood** and **Cargill** signed a joint letter advocating for the advancement of the AQUAA Act.

Chile

- In 2023, **Mowi Chile** did not appear to support proposed government restrictions on salmon farming in marine protected areas, stating in a [media interview](#), “We are convinced that salmon farming and safeguarding protected areas are compatible, it all depends on the object of conservation”.
- According to reporting in Seafood Source in February 2023, **Cooke** [opposed](#) an order from Chile’s Superintendency of the Environment (SMA) to reduce aquaculture production, a decision primarily taken to reduce pollution following overproduction at the site, and suggested that it may seek international arbitration.

Protection for Endangered Species

FACT FILE			
 LAND AND SEA USE	 OVEREXPLOITATION	 INVASIVE SPECIES	 POLLUTION
Relevance to biodiversity loss Statutory protection for endangered species (for example the Endangered Species Act in the US and the Birds and Habitats Directives in the EU) intend to protect endangered species from a variety of threats.			
OVERALL ENGAGEMENT			
Level:		Position:	
Low		Oppositional	

There are several instances of the companies and industry associations assessed advocating against protections for specific species, particularly under the Endangered Species Act in the US, but also under similar laws in the EU. This analysis focuses specifically on protection for marine mammals – it is worth noting that the [US Chamber](#) has additionally engaged on protections for a wider set of species.

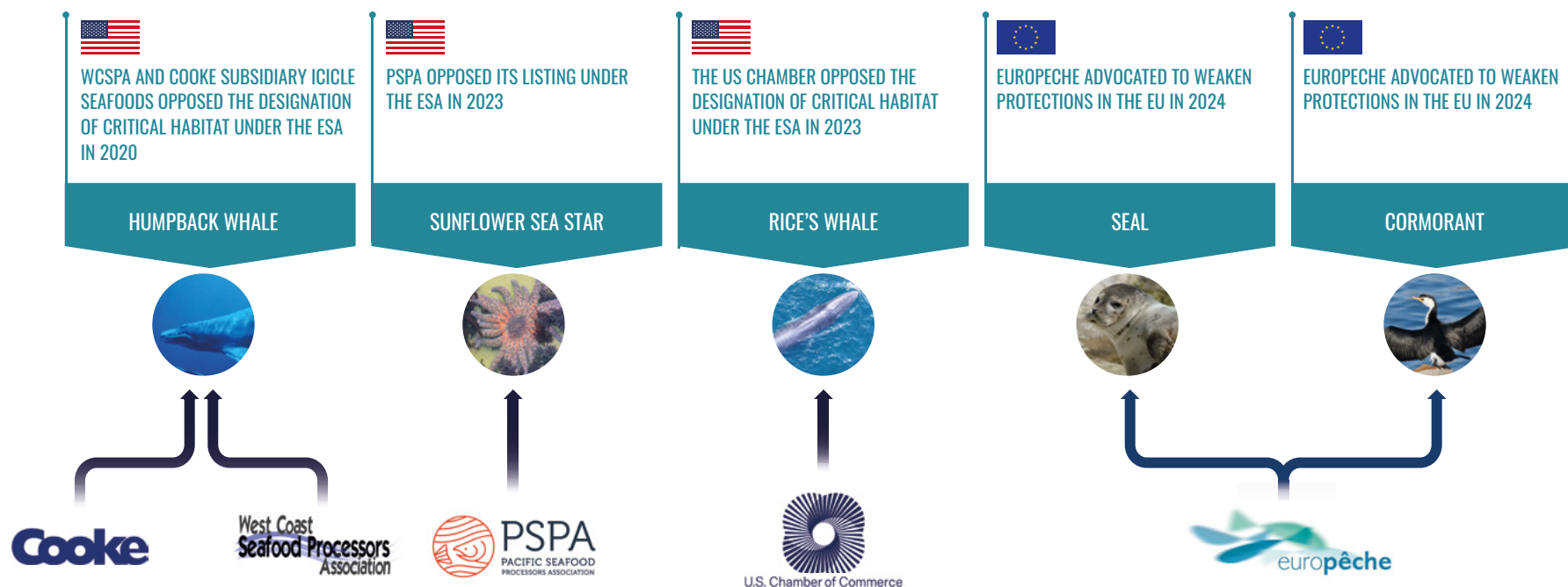
US

- In 2020, Cooke subsidiary **Icicle Seafoods** submitted a [comment](#) to the US National Marine Fisheries Service opposing the proposed critical habitat designation of the humpback whale under the US Endangered Species Act. In [comments](#) on the same consultation, the **West Coast Seafood Processors Association (WCSPA)** also advocated to narrow the proposed designation.
- In [comments](#) to the US National Marine Fisheries Service in 2023, the **Pacific Seafood Processors Association (PSPA)** opposed the proposed listing of the *Pycnopodia helianthoides* (sunflower sea stars) as endangered under the Endangered Species Act.
- The **US Chamber of Commerce** opposed the designation of critical habitat for Rice's whale under the Endangered Species Act in [comments](#) to the US National Marine Fisheries Service in 2023.

EU

- In [comments](#) published in Politico in 2024, **Europêche** appeared to advocate for the weakening of protections for seals and cormorants in the EU.

Graphic 2: Engagement on statutory protection for endangered species



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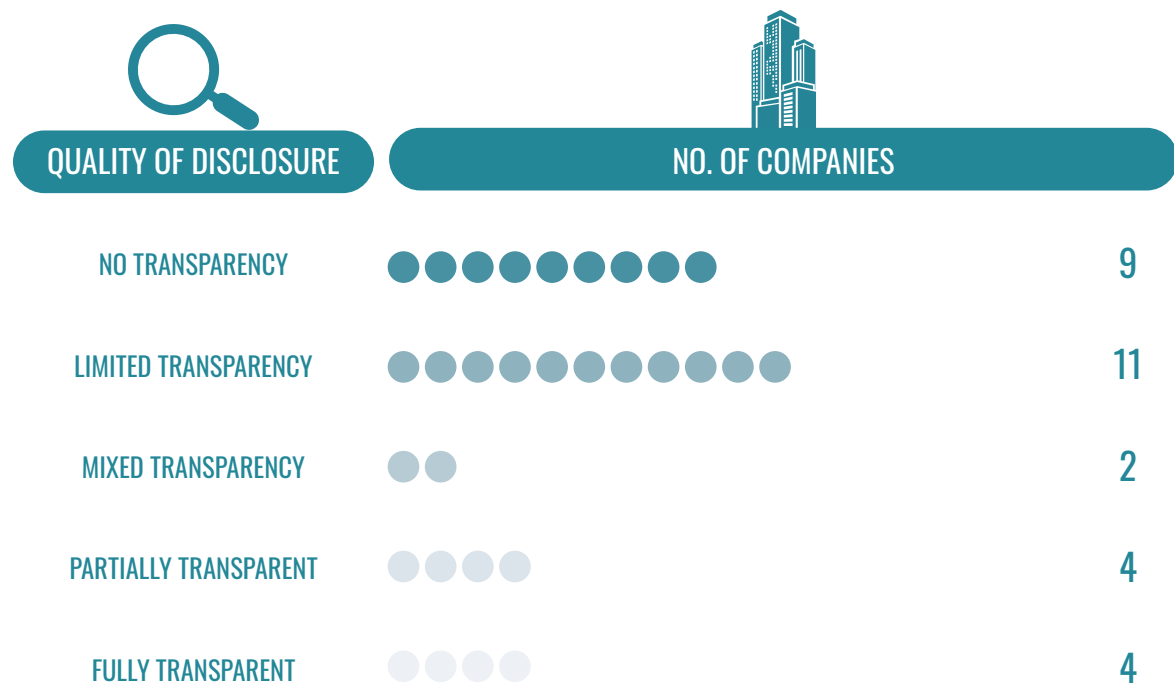
Analysis of Transparency

This section highlights the accuracy of the seafood sector's disclosure on its direct and indirect engagement activities.

Overall, the quality of disclosure by the companies assessed in this report was not aligned with investor expectations, for example the [Global Standards on Responsible Climate Lobbying](#), which sets out 14 indicators covering disclosure, governance, and oversight processes to ensure alignment between a company's climate policy engagement and delivering the 1.5°C goal of the Paris Agreement. These expectations are increasingly being translated into the biodiversity sphere, including by PRI's [Spring](#) initiative.

Two-thirds of companies had no or limited transparency on their direct engagement activities, meaning at most disclosure of top-line biodiversity positions without discussion of actual policy positions. Only four companies have disclosure on their biodiversity-related policy engagement that is aligned with InfluenceMap's assessment of other data sources in the public domain – [Mowi](#), [SalMar](#), [Nutreco](#) and [Parlevliet & Van der Plas](#).

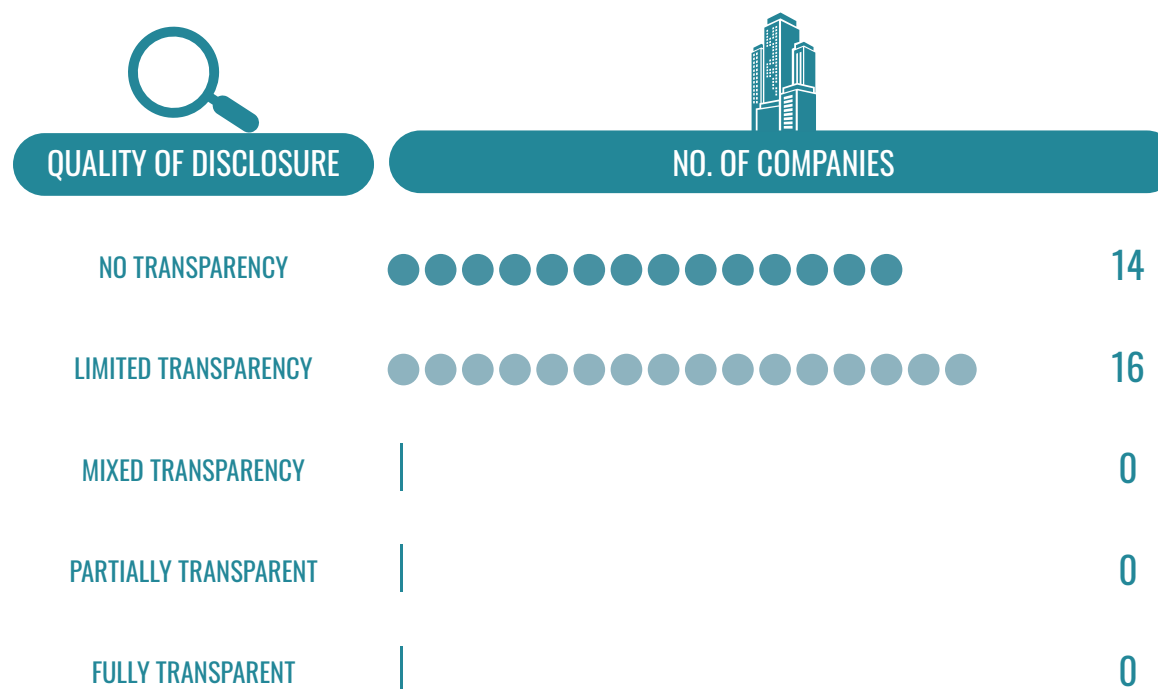
Graphic 3: Company disclosure on direct engagement



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Approximately half of the companies had no disclosure at all on their industry association memberships, while the other half had at least a partial list of industry associations, but without further details on these groups' advocacy activities or positions. Given the wide range of engagement activities undertaken by industry associations in the seafood sphere this represents a likely governance oversight, and falls significantly short of investor expectations on corporate lobbying.

Graphic 4: Company disclosure on indirect engagement



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