

To: Her Excellency Tania Romualdo, Ambassador and Permanent Representative of Cape Verde to the United Nations, and His Excellency James Larsen, Ambassador and Permanent Representative of Australia to the United Nations, as co-facilitators of the draft political declaration of UNOC3

Thursday 20th February 2025

Subject: General Comments by small-scale fishers on the zero draft political declaration “Our Ocean, Our Future: Accelerating Action” to be signed by the authorities present at the 3rd UN Ocean conference in Nice, France, June 2025.

Your Excellencies Mrs Romualdo and Mr Larsen,

We, small-scale fishermen and fisherwomen (local, Afro-descendant and indigenous peoples' communities that make traditional and sustainable use of ocean fishery resources), address you as rights-holders of the oceans, and promoters of the commitments made by governments: the Voluntary Guidelines for the sustainability of small-scale fisheries in the context of food security and poverty eradication, Sustainable Development Goal 14, the Kunming Montreal Global Biodiversity Framework and the conventions on Human Rights, to advance together towards the conservation and protection of the ocean for the human welfare of future generations. We, fishers, have also taken inspiration from these documents and from our own Call to action, launched at the 2nd UN Oceans conference (2022),¹ to already take action to protect our coastal and marine territories of life.

After reading the zero-draft prepared with the inputs of Civil Society, we present therein the ideas that we consider central to a document that should reflect the interests and needs of all.

1. On the importance of small-scale fishers as rightsholders and guardians of the sea and providers of food security and employment to many

We greatly appreciate the efforts for a document of such relevance to mention, in Article 2, the need to *“act urgently to address this challenge with bold, ambitious, fair and transformative actions, and ensure that all people, including women and girls, people with disabilities, youth, indigenous peoples and other marginalized groups, can participate in ocean-related decision making.”*

¹ See www.ssfcalltoaction.org – website available in French, English, Spanish and Portuguese. Also available in PDF format in Arabic, Swahili and Wolof.

However, we believe that, because of the importance and great contributions of our sector, this paragraph should clearly spell out the importance of our sector's participation in decision-making. **Small-scale fishers, women and men from local communities and indigenous peoples, should be considered as priority vulnerable actors facing environmental, climatic, social and economic challenges of our planet.** Although coastal communities are mentioned, there is no other place where the importance and existence of our sector is recognized until paragraph 25 f of the document: *"Support small-scale fishers, women and girls, youth and indigenous communities"*.

The draft should also clearly call for compliance of the Voluntary Guidelines for securing sustainable small-scale fisheries² adopted by the governments in 2014, and that the conservation of the sea and its resources will depend on a clearly inclusive and equitable conservation that considers us under a human rights approach, as has recently requested in her recommendations the UN Special Rapporteur for a right to a clean and healthy environment.³

2. On the blue economy and its impact on our ways of life

There have been many narratives about how turning our eyes to the sea could bring enormous benefits to the economies of the planet, under the guise of "blue economy". However, as small-scale fishing communities of indigenous peoples, local communities and afro-descendants, we have had and still have to defend ourselves against more powerful industries, that compete with us for space and access to resources, often polluting and destroying our environment, our territories, our culture. This unfair and inequitable blue economy development has often been supported by governments and businesses, with little interest in the social and environmental impacts it generates.

We want clarity in the use of the narrative and absolute respect for our Call to Action,⁴ which clearly states that we should be protected from those large and destructive industries that come to our territories of life to take away our land, sea and our fundamental human rights.

We ask that in paragraph 25, paragraphs a, b, c, clearly speak of a just and equitable economy for all and where us, small-scale fishers, and our way of life are protected and recognized to continue ensuring the food security of the planet.

3. On finance conservation tools and accountability for the implementation of SDG Target 14.6

The draft declaration mentions private and market-based conservation tools that, have, until now, excluded us and jeopardised our future. Specifically, we talk about nature-based solutions

² See the Guidelines for Securing Sustainable Small-Scale Fisheries in the Context of Food Security and Poverty Eradication (2014): <https://openknowledge.fao.org/handle/20.500.14283/i4356en>

³ See <https://docs.un.org/en/A/HRC/58/59>.

⁴ See <https://www.ssfcalltoaction.org/blue-economy>

that include payments for environmental services, blue carbon credits, debt-for-nature swaps, 30 x 30 and other forms of area-based conservation.⁵

We specifically mention paragraphs 13 and 17, where although it mentions the ecosystem-based approach and recognizes our fundamental role as participants in these processes, it also mentions the same nature-based solutions that until now have been a double-edged sword for our communities and ways of life.

The “ecosystem approach” narrative considers a “socio-ecological and systemic approach” that is key in the search for solutions from a more holistic perspective.

These top-down market-based tools, applied without secure tenure rights or access rights to our fishing areas, criminalise us and promote a type of conservation that excludes and impoverishes us. **We request that the ecosystem approach be emphasized in the future focus of the actions and that if market-based tools are used, they should consider clear and forceful safeguards that ensure information, free, prior and informed consent, and that ensure our participation in the implementation of their actions.**

4. On generating knowledge about the sea and its environmental and social resources

The draft declaration clearly reaffirms what we already face: we, small-scale fishers and our families, are on the front line of the impacts of climate change. However, without a human rights-based approach, there are many additional challenges to ensuring our contribution to conservation and to securing our way of life.

In this regard, it is essential to include community-based climate change adaptation and mitigation measures. The restoration of social-ecological systems must be designed by the communities and implemented by the communities themselves. This is an effective measure for climate change adaptation and funding should help it happen.

We urgently request, not only that funding resources for climate change mitigation reach our organizations and thus our marine and coastal territories as a priority, but also that all projects oriented or aimed at working on the issue should incorporate clear and mandatory objectives that help us indigenous peoples, local communities and afro-descendant fishers to strengthen our capacity to adapt to the climate challenges of our planet.

Our knowledge should not only be recognized per se (paragraph 24), but valued in terms of the urgency with which the ocean crisis needs to be addressed. It is only with this knowledge and by supporting our sustainable ways of life that we can ensure, as stated in paragraph 18, the food security that supports billions of people on the planet. The search for an inclusive science that values this contribution of our people is the main element of the achievement of a successful

⁵ For more information, see the series of publications “Conservation finance”, which explore the impacts of the blue economy and of some of these market-based tools on our small-scale fishing communities: <https://www.cffacape.org/conservation-finance>

meeting in Nice, where all developing and developed countries, powerful and vulnerable sectors wish to sit down and contribute to ocean conservation.

We appreciate this effort to organize and promote the Third UN Ocean conference in Nice that will encourage the dialogue towards the conservation and sustainable use of the ocean.

We want to be there, and we hope to be part of this meeting in a dignified and prepared manner.

We hope that the final document signed by governments, will validate and accompany the implementation of the SSF Call to Action, presented in Lisbon in 2022 and which puts on the table our priorities to accompany you in this process.⁶

Yours sincerely,

The signatories of the SSF Call to Action⁷

CC: Mr Peter Thomson, Special Envoy of the United Nations Secretary-General for the Oceans
Mr Remi Varda and Ms Lorelei Picourt, facilitators of the Civil Society comments

⁶ See <https://www.ssfcalltoaction.org/>

⁷ See <https://www.ssfcalltoaction.org/signatories>