# SQUIDS IN THE SPOTLIGHT:

Unregulated squid fisheries are headed for disaster



-44

旭山

TATE

-

- Millelinite

180

h

Transshipment between a squid fishing vessel and a reefer in the North Indian Ocean © Fernanda Ligabue / Greenpeace

# CONTENTS

INTRODUCTION	3
THE EXPANSION OF GLOBAL SQUID FISHERIES	5
MANY SQUID FISHERIES ARE UNREGULATED, PARTICULARLY ON THE HIGH SEAS	9
Case studies	10
South West Atlantic	10
The East Pacific	12
North West Indian Ocean	14
A VITAL SPECIES: THE ENVIRONMENTAL IMPORTANCE OF SQUID	17
A STRONG GLOBAL OCEAN TREATY: STATUS QUO ON THE HIGH SEAS IS NOT AN OPTION	19
REFERENCES	22

"Squids are essential to healthy, functioning oceans. As both predator and prey, they sustain entire food webs and perform vital ocean functions."

# INTRODUCTION

Last century, after relentless industrial fishing, finfish catches peaked at 130 million tonnes and have been in decline ever since.<sup>1</sup> Now, squids could face the same fate, with unregulated industrial fishing on the high seas decimating these vital species. With a rapid increase in squid fishing occurring despite a lack of adequate data or environmental regulation, it seems the industry has learned nothing from the depletion of finfish populations all those years ago.

This unchecked growth in squid fishing not only impacts the species but the entire marine ecosystem. Squids are essential to healthy, functioning oceans. As both predator and prey, they sustain entire food webs and perform vital ocean functions, such as their ability to transport carbon and nutrients between marine ecosystems, acting as transient 'biological pumps'.

In the last two years, Greenpeace International has laid bare the insufficient nature of current ocean governance, exposing the ways in which the status quo fails to protect biodiversity on the high seas. We, alongside Greenpeace Germany, have conducted regional studies (South West Atlantic,<sup>2</sup> Western Indian Ocean),<sup>3</sup> sectoral studies (in relation to ghost fishing gear,4 transshipments5 and deep seabed mining),<sup>6</sup> and reported on the plight of species that play key roles in marine ecosystems, such as sharks,<sup>7</sup> turtles<sup>8</sup> and now squid. These analyses shed a light on the numerous gaps in ocean governance, ranging from fisheries management organisations and conservation agreements, to shipping regulators and flag States.

In this report, we examine the expansion of squid fisheries and look at three regions where this expansion has occurred. We consider the ways in which these fisheries have been allowed to expand with little scrutiny or management rules – even in areas where Regional Fisheries Management Organisations (RFMOs) have a mandate to manage them – and explore why several major squid fisheries have been characterised as unregulated. The cumulative impacts of climate change, ocean acidification, pollution and overfishing of vital species like squid make it startlingly evident that humankind is modifying marine ecosystems at a scale never before seen in history.

In the face of such unprecedented challenges, it is clear that we need to radically rethink the systems that caused this crisis. Yet governments continue to champion a fragmented and piecemeal approach to ocean protection – a woefully inadequate response that pays no mind to marine wildlife, ecosystems or the billions of people who rely on them.

There is an urgent need for a strong Global Ocean Treaty.<sup>9</sup> One which ensures that regional and industry bodies take a more holistic approach to the conservation of the high seas. The Treaty must establish modern, comprehensive and transparent Environmental Impact Assessments before expanding any activity that may harm high seas biodiversity, and a global mechanism for establishing fully protected marine protected areas. This is the only way to give struggling marine populations and in turn, entire ecosystems, the time and space they desperately need to recover.

1 1

1 1

# THE EXPANSION OF GLOBAL SQUID FISHERIES

In the last few decades, the expansion of fisheries targeting squid has been remarkable. Catches of cephalopods (which include squid, octopus and cuttlefishes), has increased almost 10-fold over six decades, from around 0.50 million tonnes annually in 1950 to a peak of 4.85 million tonnes in 2014.<sup>10</sup> In particular, squid catches increased worldwide in this period.<sup>11 12</sup>

China Mainland, Peru and Indonesia have dominated squid catches in recent years, while South Korea, Japan, Taiwan and Spain had the highest availability of cephalopods for local consumption. However, the expansion of squid catches has not coincided with an expansion of protective measures to prevent overexploitation.

Fisheries targeting cephalopods and invertebrates in general have significantly expanded in recent decades, in stark contrast to declining catches of finfish. While global landings of all marine species peaked in the mid 1990s,<sup>13</sup> landings of invertebrates continued to mount. This could be an industry response to declining finfish catches, combined with an abundance of invertebrate species due to the decline of predators in the ecosystem.<sup>14</sup> Recent trends show that this rise in cephalopod, and therefore squid, catches is not expected to continue, with evidence of overexploitation of some cephalopod species.<sup>15</sup> Global cephalopod catches seem to have levelled off and have recently experienced important fluctuations. A peak in catches of 4.3 million tonnes in 2007 was followed by a decrease to under 3.5 million tonnes in 2009, peaking again at 4.85 million tonnes in 2014. After that, cephalopod catches fell again to about 3.6 million tonnes in 2017, 2018 and 2019.<sup>16</sup>

These fluctuations may partially reflect the natural variability of some cephalopod populations, along with the fact that a significant share of world cephalopod landings relies on a very small number of oceanic squid species.<sup>17</sup> The fall in landings since 2007 was almost entirely attributable to a temporary collapse of the landings of Argentine shortfin squid (Illex argentinus). The recovery since 2009 was mainly driven by increased landings of jumbo flying squid (Dosidicus gigas) and recovery of the Argentine shortfin squid since 2011. The drop in the world cephalopod catch in 2016, by over 1.1 million tonnes, reflected another 85% drop in the catch of Argentine shortfin squid and reduced landings of jumbo flying squid and Japanese flying squid (Todarodes pacificus).18



FIGURE 1 Global catches of squid and cephalopods from 1950-2019<sup>89</sup>

#### TOP SQUID FISHING POWERS





The Food and Agriculture Organization (FAO) '2020 State of World Fisheries and Aquaculture' report also shows how a few pelagic species, notably squid species, carry a lot of weight in the overall catches of many regions. According to the FAO, in the South East Pacific, sharp declines in catches from over 20 million tonnes in 1994 to between 7 to 10 million tonnes in recent years have been "partially offset" by the significant increase in jumbo flying squid landings. In the North West Pacific, the significant decline over 25 years of Japanese pilchard (Sardinops melanostictus) and Alaska pollock (Theragra chalcogramma) are "in contrast" with a great increase of squids, cuttlefishes, octopuses and shrimps since 1990. In the Eastern Central Pacific, a large proportion of the landings are small and medium-sized pelagic fish, squids and prawns. In the South West Atlantic, the most important species in the landings are Argentine shortfin squid, representing 10-40% of the region's total catches. However, total landings of this species experienced a sharp drop, from more than 1.0 million tonnes in 2015 to 360,000 tonnes in 2017.19

Overall, the situation suggests that overexploited finfish species have been substituted with cephalopods and other invertebrates, a trend which may be masking a serious problem of overfishing and flawed fisheries management.

In 2019, the top five fishing powers targeting squid globally were China Mainland, Perú, Indonesia, India and Russia, with China Mainland, Peru and Indonesia accounting for almost 60% of the global squid catch.<sup>20</sup> A recent analysis of global trade in cephalopods found that they are one of the fastest growing products in terms of market share in the global seafood trade. "The situation suggests that overexploited finfish species have been substituted with cephalopods and other invertebrates, a trend which may be masking a serious problem of overfishing and flawed fisheries management."



**The jumbo flying squid, or humboldt squid** © Norbert Wu / naturepl.com

According to this research, only three markets (China Mainland, Spain and Japan) led the majority of global market movements between 2000 and 2019. Only eight traders dominated the cephalopod market in Asia (China Mainland, India, South Korea, Thailand and Vietnam), Europe (the Netherlands and Spain), and the USA. In terms of consumption, in 2013, South Korea, Japan, Taiwan and Spain had the highest availability of cephalopods for local consumption.<sup>21</sup>

Despite the expansion of fisheries targeting invertebrates, population assessments and data are often lacking.<sup>22</sup> Even though our

understanding of cephalopod biology and ecology in recent decades has improved, many of their populations are not assessed, and some assessments use methods not well adapted to cephalopod life history and ecology.<sup>23</sup> Indeed, recent investigations warn that the increasing percentage of invertebrate fisheries which are being overexploited, collapsed, or closed is "reminiscent of an earlier phase in finfish fisheries during which the rate of finding new fishing areas, new target species, and more efficient gears masked overall catch trends."<sup>24</sup> As such, it is paramount that cephalopod fisheries are effectively monitored and managed to protect them against overfishing.



**FIGURE 3** Worldwide cephalopod food supply in g/capita/ day for 2013<sup>91</sup> "There are currently no specific regulatory and monitoring systems in place to analyse the traceability of the global trade in cephalopods."

TE DESERVED

A squid vessel in the North Indian Ocean © Abbie Trayler-Smith / Greenpeace

XIZIZIZIZIX

# MANY SQUID FISHERIES ARE UNREGULATED, PARTICULARLY ON THE HIGH SEAS

Whilst finfish catches are generally regulated, albeit far from perfectly, invertebrate fisheries have expanded "with little scientific scrutiny." <sup>25</sup> In fact, the increase in global fishing effort for cephalopods, notably squid, has been attributed to an increase in large jigging vessels<sup>26</sup> operating on the high seas,<sup>27</sup> where most of these fisheries are effectively unregulated.

Logic dictates that the expansion of any fishery would require a set of conservation and management measures, including data collection, stock and environmental impact assessments, capacity and effort limits, monitoring and control provisions. However, these measures are often very limited for fisheries targeting invertebrates - a situation which must be urgently improved. Given the important ecological role of these species (see page 17: 'A vital species: the environmental importance of squid'), fisheries management must seek to avoid harm to and - where necessary - restore these vital marine ecosystems. As researchers have pointed out, "while finfish fisheries and some more established invertebrate fisheries have received increasing assessment, regulation, and rebuilding, many invertebrate fisheries do not get the same level of attention or care."28

Regulation of fisheries requires good data collection. However, accurate information on squid fisheries is lacking for many regions, particularly regarding fisheries on the high seas. As stated, this is important since the increase in global fishing effort for cephalopods, notably squid, has been attributed to an increase in large jigging vessels fishing on the high seas. These vessels are mainly targeting Argentine shortfin squid, Japanese flying squid, neon flying squid (*Ommastrephes bartramii*) and Gould's flying squid (*Nototodarus gouldi*), with an increased number of small artisanal boats also catching jumbo flying squid nearshore with hand jigs.<sup>29</sup> The management of squid fisheries is rife with technical challenges. Natural fluctuations in squid populations and those forecasted due to environmental changes and the climate crisis make it difficult to define the appropriate type of assessment methods, including data requirements and management measures.<sup>30, 31</sup> Given their current scale, it is therefore critical that these fisheries are properly managed, in accordance with the precautionary principle, "so they do not face the same fate as many of their longer-lived counterparts."32 Yet despite growing market demand, researchers focusing on trade found that there are currently no specific regulatory and monitoring systems in place to analyse the traceability of the global trade in cephalopods.33

The ecosystem and precautionary approaches to fishing are widely endorsed and codified in international law.<sup>34</sup> These approaches provide greater consideration for ecosystem structure and function, improving management decisions and therefore the sustainability of marine resources.<sup>35</sup> Yet they are poorly applied and fundamentally absent from most existing management measures for squid fisheries, particularly on the high seas. Instead, singlespecies fisheries management – which largely ignores the impacts of fishing on associated species – continues to dominate.

In fact, in some of the main catching regions, including the high seas, there is no multilateral mechanism to regulate these fisheries (see case studies on the South West Atlantic and the North West Indian Ocean). That means that the management of many squid fisheries, particularly on the high seas, conforms to the definition of 'unregulated fishing' in the FAO's 'International Plan of Action to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing'.<sup>36</sup>

#### **CASE STUDIES**

Only a small proportion of global squid fisheries are regulated. Two recent Greenpeace reports<sup>37, 38</sup> exposed the unregulated nature of squid fisheries on the high seas of the South West Atlantic and the North West Indian Ocean.

With no agreed multilateral management measures in place, these areas have seen high increases in the numbers of vessels operating there, with unknown impacts on marine ecosystems. In the South East Pacific, the existence of a RFMO has not resulted in measures capable of ensuring the protection of marine ecosystems from overfishing.

#### SOUTH WEST ATLANTIC

One of the most heavily exploited marine populations in the South West Atlantic is the Argentine shortfin squid, a neritic-oceanic species and one of the largest squid fisheries in the world.

Argentine shortfin squid plays an important ecological role and has an extensive distribution and migration, straddling the waters of Argentina, the Malvinas/Falkland Islands and into the high seas. There are no multilateral management measures in place to prevent the overexploitation of this species and the conservation of marine ecosystems.

Catches of squids in the South West Atlantic rose from 1970 until 1999, after which point there were important fluctuations. Most recently, catches reportedly peaked in 2015 at 1,011,330 tonnes, followed by a sharp decrease to 249,260 tonnes in 2019.<sup>39</sup> This boom and bust cycle partly reflects the high natural fluctuations of these populations.<sup>40</sup> After all, recruitment in squid populations is influenced by oceanographic conditions and climate change which is likely to drive more variability within the environment. Researchers suggest that dramatic declines in these populations, with consequences in associated and dependent species, "could be potentially avoided by considering environmental factors in the development of management strategies for increasingly targeted squid stocks."41 It seems clear that in the absence of an appropriate management framework, there is no way to deal with these fluctuations, let alone effectively prevent overfishing. This instability, when coupled with climate change as a threat multiplier, should be of utmost concern for any nations dependent on the cephalopod market.



#### SQUID CATCH BY AREA OF THE OCEAN

FIGURE 4 Squid catch by area of the ocean from 1950-2018<sup>92</sup>



Argentine shortfin squid, among other species, has attracted a substantial international fleet. In 2019, Greenpeace estimated that from January to July, the number of fishing vessels in the Blue Hole - an area of the high seas located some 500km east of the Gulf of San Jorge, in the Argentinean Patagonia – exceeded 400 during peak squid fishing season.<sup>42</sup> The Argentinean government identified 546 foreign vessels operating off its Exclusive Economic Zone (EEZ) during the 2020-21 fishing season, of which 379 were squid jiggers and 81 were bottom trawlers, which also catch squid.<sup>43</sup> Indeed, the concentration of squid jiggers was so substantial that at night, the lights onboard the vessels rendered the border of the Argentinean EEZ clearly visible from space.

The fact that this squid fishery straddles the waters of Argentina, the Malvinas/Falkland Islands and into the high seas is a critical issue for its management. As well as being targeted in the EEZs of Argentina and the Malvinas/Falkland Islands, it has been estimated that between 11% and 35% of the shortfin squid stock is concentrated in the area over the Patagonian shelf and slope on the high seas,<sup>44</sup> an area outside national jurisdictions. This shows just how important it is to ensure that coordinated, compatible measures are put in place across the range of the population.

Yet fishing vessels targeting squid in the region are subject to practically no regulation, limited only to those enforced by flag States.<sup>45</sup> This absence of multilateral rules, combined with dwindling resources that increase the demand on marine life, is a recipe for disaster. Above: A satellite image of the Blue Hole, showing the concentration of fishing vessels in January 2022 (orange circle) © NASA Worldview

Below: View of squid vessels from onboard a boat in the Blue Hole  $\ensuremath{\mathbb{G}}$  Greenpeace



This absence also makes it difficult to assess the level of fishing capacity and effort in the fishery; to determine the impacts of fishing or introduce effective monitoring, control and surveillance provisions. Recent global analysis shows that the area is a hotspot for transshipment activities, particularly given the large squid fleets present.<sup>46</sup> Distant water fishing vessels are known to turn off their Automatic Identification System (AIS) and enter Argentinean waters illegally. What's more, there is a strong symbiotic relationship between labour abuses and IUU fishing. Where there is weak regulation and poor enforcement, sustainability and human rights inevitably suffer.<sup>47</sup> During the 1990s, the Argentinean and British governments created the South Atlantic Fisheries Commission (SAFC) to promote conservation and determine allocation quotas of straddling populations of fish and squid. The SAFC didn't result in an effective management regime and the meetings were discontinued. In any case, such a bilateral commission would not have the ability to prevent overfishing unless a multilateral cooperation mechanism was established, including fleets fishing in international waters. Now, even bilateral initiatives have reached an impasse, leaving valuable species and ecosystems completely vulnerable to overfishing.

#### THE EAST PACIFIC

The fishery targeting jumbo flying squid in the East Pacific, which ranges from the Southern coasts of the United States to Chile and the adjacent high seas, is one of the largest fisheries in the world and the largest invertebrate fishery.<sup>48</sup>

The number of vessels targeting squid has seen a sharp increase in recent years. Unlike other unregulated squid fisheries, the high seas portion of this fishery is under the purview of the South Pacific Regional Fisheries Management Organization (SPRFMO). However, this has done little to protect the fishery, with the organisation failing to exert an effective control of the fishery or prevent mounting fishing effort on regional squid populations. Although the population structure of jumbo flying squid in the East Pacific is not well known, it is a widely distributed population straddling the EEZs of several countries and the high seas.<sup>49</sup> There are well established fisheries targeting jumbo flying squid, both artisanal and industrial, in the jurisdictional waters of Peru, Chile and Ecuador, as well as on the high seas, where vessels predominately flagged to China Mainland, Korea and Taiwan operate. The SPRFMO – a multilateral body involving the presence of 18 participants<sup>50</sup> is responsible for the management of these fisheries on the high seas. Its members have a clear mandate to establish measures for the high seas and ensure those adopted for areas under their respective national jurisdictions are "compatible in order to ensure conservation and management of straddling fishery resources in their entirety."51



Artisanal fishing boats in Peru © Getty Images

#### INDIAN OCEAN SQUID CATCH



**FIGURE 6** Squid catch in the Indian Ocean from 1950-2018<sup>94</sup>

As is the case with squid fisheries in the South West Atlantic, no squid fishing on the high seas of the Indian Ocean falls within the area of competence of any RFMO, as neither the Indian Ocean Tuna Commission nor the South Indian Ocean Fisheries Commission have a mandate to manage squid fisheries. Catches from these fleets are therefore not managed by any international body and not subject to agreed catch limits, time or area closures, or an international monitoring, control and surveillance system. The squid fisheries in the high seas of this region are therefore effectively unregulated.

In early 2021, Greenpeace spent several days observing the fishery near Yemen from our ship MY Arctic Sunrise. Soon after exiting the country's EEZ, bright lights could be seen on the horizon in several directions. As Greenpeace progressed further into the Indian Ocean, these football-stadium-scale lighting rigs became more numerous. Using AIS maps of the area, well over 100 Chinese fishing vessels, presumed to be catching squid, were counted in the north western Indian Ocean. From the deck of the ship, twenty such vessels could be counted at any one time along the horizon.

The gear used by vessels targeting squid in this region is also becoming a matter of concern. Our at-sea documentation found that in early 2021, all fishing vessels present in the fishing ground were using nets rather than jigs, although some officers did identify their vessels as jiggers over ship radio communications. The absence of jiggers may relate to the timing of the documentation<sup>71</sup> but an increasing use of nets is concerning as they are less selective and more intensive than jigging, particularly when deployed alongside floodlights which attract a wide variety of species – including tuna and small pelagic fish.

As in the South West Atlantic, recent analysis has identified a cluster of transshipment activity on the high seas which has been linked to a squid fishery.<sup>72</sup> In this region, the level of AIS transmission is very low, with a significant number of vessels switching AIS off or transmitting intermittently whilst on the fishing ground, providing limited vessel identifier information transmitted over AIS.<sup>73</sup> This makes monitoring of the fleet particularly challenging and the precise number of transshipments at sea uncertain. The levels of squid catches are not clear in this area. According to industry estimates, in 2019 the catch may have exceeded 100,000 tonnes.<sup>74</sup> However, the FAO database contradicts this, not recording any data for the relevant area. This irregular data reporting is incompatible with meaningful fisheries management.

The fishery is almost exclusively composed of Chinese vessels. China has recently started to implement measures to address the management of its squid fleet on the high seas,75 and issued two Ministerial Circulars in 2020 and 2021 in light of "crowded fishing grounds on the high seas, low single-vessel output, declining market prices, and reduced corporate profits." Although this represents an opportunity to strengthen the management and regulation of this fishery, there are no guarantees. With only one flag State involved (at least on the high seas),<sup>76</sup> other participants could join the fishery or coastal States could develop their own squid fisheries - be it in their waters or in the adjacent high seas.



The inability of SPRFMO members to establish an adequate management framework<sup>52</sup> to ensure the sustainability of this fishery is a matter of grave concern. Particularly if we take into account that, according to estimations by Global Fishing Watch (GFW),<sup>53</sup> the squid fleet may represent 74% of the total vessels registered to SPRFMO, making it arguably one of its core businesses.<sup>54</sup>

In 2020, there were 587 vessels considered active in the SPRFMO Convention area, mostly flagged to China Mainland.<sup>55</sup> This is a substantial increase from the 257 vessels considered active in 2015.<sup>56</sup> The total fishing days have also increased greatly, almost doubling in the last five years.

However, this has not been translated into proportionally higher catches. For instance, the number of fishing days reported to the SPRFMO Secretariat went from 60,883 fishing days active in 2015, compared to 120,335 days in 2020, while reported catches went from 337,971 tonnes to an estimated 361,090 tonnes in the same period. In 2019, the catches of jumbo flying squid reported to the SPRFMO Secretariat by coastal States (Peru, Chile and Ecuador) were 586,692 tonnes, compared to 313,333 tonnes taken by distant water fishing fleets (China Mainland, Korea and Taiwan). Of these, Peru (526,900 tonnes) and China Mainland (305,670 tonnes) were by far the major fleets, jointly accounting for 92.5% of the reported catch.57

The actual level of fishing activity may be higher than official figures. According to an analysis by GFW, 615 squid fishing vessels were active in the region in 2020,<sup>58</sup> compared to a total of 587 vessels estimated by the SPRFMO Secretariat.<sup>59</sup> In the GFW analysis, over 10% of the vessels identified as active by AIS could not be matched to the official list. Greenpeace's at-sea investigations have consistently revealed the widespread discrepancies between AIS signals and the vessels observed.

The adequacy of effective monitoring, control and management measures (or lack thereof) specific to the fishery needs to be addressed. In 2020, GFW identified a total of 41 carrier vessels active in the area – a figure far greater than the number reported on the SPRFMO Active List that year, which was 12.<sup>60</sup> This indicates a serious risk of unreported catches. Tellingly, AIS misuse has been verified in the SPRFMO area, with 13% of the fleet exhibiting AIS irregularities that obscured vessel identity and location. In addition, observer levels are clearly insufficient to ensure an adequate data collection and sampling in the fishery.<sup>61</sup>

It is troubling that the problems associated with the expansion of this squid fishery in recent years and the absence of adequate regulatory measures is well known to SPRFMO members. So much so that in 2018, an independent performance review<sup>62</sup> conducted by the SPRFMO clearly exhibited the management flaws in the flying jumbo squid fishery. The review urged the Commission to act swiftly to address a number of issues, including data collection, the adoption of a specific and comprehensive conservation and management measure, as well as put in place "precautionary measures until sufficient information is available to undertake a reliable stock assessment."<sup>63, 64</sup> A number of respondents to the questionnaire conducted by the review panel "expressed concern about the lack of management decisions for the Jumbo flying squid fishery" and "highlighted the fact that this was the largest fishery in the Convention Area, vet no fisheries management decisions had been taken and there were serious gaps in the provision and collection of fisheries, biological and environmental data on this fishery."65

It was not until 2020 that the SPRFMO introduced its first Conservation and Management Measure (CMM) related to the management of the squid.<sup>66</sup> However, this failed to address some of the main problems in the fishery, in particular capacity and effort management, catch limits and more strict control provisions. The SPRFMO held its 10th Commission Meeting on 24-28 January 2022, where parties again failed to improve the management of this important fishery.

In summary, the flying jumbo squid fishery on the high seas of the East Pacific Ocean provides a clear case of fishery expansion in the absence of adequate information and management measures. Furthermore, it represents a failure to implement relevant provisions in international law by an RFMO, such as the precautionary approach, or to even act upon the recommendations of its own performance review panel.

#### NORTH WEST INDIAN OCEAN

In recent years, a new squid fishery has developed on the high seas of the North West Indian Ocean, off the EEZs of Yemen and Oman. There is currently no regional fisheries body overseeing this fishery, with no agreed conservation and management measures, monitoring, control and surveillance provisions. What's more, no data is publicly available about the status of these squid populations or the precise number and type of vessels targeting them.

Throughout the Indian Ocean high seas, urgent action to mitigate the harmful impacts of wellestablished fisheries, such as those targeting tuna, has been delayed by governance failings and political inaction. As such, the development of new and completely unregulated squid fisheries is seriously troubling.<sup>67</sup>

According to a report by the World Wildlife Fund (WWF), squid fisheries have rapidly expanded in recent years, with the number of vessels increasing by 830% in just five years, from 30 vessels in 2015 to 279 at the end of 2019.<sup>68</sup> In 2020, monitoring of the fishery conducted by Greenpeace and Trygg Mat Tracking<sup>69</sup> indicates that squid fishing operations in the region have continued to expand significantly.<sup>70</sup>



**Lights from a squid vessel in the North Indian Ocean** © Abbie Trayler-Smith / Greenpeace

"Widespread unregulated fishing of squid poses a threat to the entire ecosystem, including vulnerable populations of cetaceans, seabirds and commercial fisheries which rely on healthy squid populations for sustenance."

# A VITAL SPECIES: THE ENVIRONMENTAL IMPORTANCE OF SQUID

The expansion of squid fisheries and resulting demand for this species has "no historical precedent."<sup>77</sup> Nor has this expansion taken into account the vital role squids play in the functioning of marine ecosystems. As such, this rapid expansion and, in some cases serial depletion, of global invertebrate fisheries may have grave environmental consequences.<sup>78</sup>

Squid species are short-lived, semelparous<sup>79</sup> and fast growing, with high feeding rates. They have high reproductive rates and are sensitive to ecological changes, thriving in favourable conditions but quickly deteriorating in poor ones. Year to year, their abundance may be highly variable.<sup>80</sup>

As established, higher catches of squid reflect the expansion of fishing fleets. However, the abundance and availability of many invertebrates may have also increased due to the decline of predators in the ecosystem, caused by overfishing of other species and changes in the marine environment, such as ocean warming. Recent analyses have concluded that globally, cephalopod populations have increased over the last six decades.<sup>81</sup> But this growth does not make squids impervious to human activity in the future.<sup>82</sup>

The importance of cephalopods in sustaining marine ecosystems cannot be overstated. Worldwide, they are a key component of food webs, providing a major prey source for coveted fish species like tunas and salmon, cetaceans like dolphins, sea lions and whales, and a variety of seabirds. In the South West Atlantic, cephalopods are estimated to account for 38% of fish prey, including for key species like hake which are the mainstay of other local fisheries.<sup>83</sup>

Squid are also predators themselves that make long migrations over their lifecycle. They are responsible for moving large amounts of biomass (i.e. the fish, crustaceans and plankton they consume), including carbon and nutrients, from one area of ocean to another (e.g. the twilight zone to the ocean surface), acting as transient 'biological pumps'. They may also be keystone species on which entire ecosystems directly and indirectly depend.<sup>84, 85, 86</sup> As such, overfishing of squid poses a serious threat to the entire ecosystem, including vulnerable populations of whales and dolphins.

Although squids are sensitive to environmental changes, populations are resilient and can recover from a decrease in their numbers. However, when heavy fishing pressure coincides with poor environmental conditions, a critical tipping point is reached, potentially disrupting the entire food chain. If populations fall below certain levels, this could have catastrophic ecological and economic consequences.<sup>87</sup>

Given the vital role cephalopods play in the marine ecosystem, it is clear that cephalopod fisheries should be managed in a sustainable manner, preferably in the context of ecosystembased fishery management. Widespread unregulated fishing of squid poses a threat to the entire ecosystem, including vulnerable populations of cetaceans, seabirds and commercial fisheries which rely on healthy squid populations for sustenance.



# A STRONG GLOBAL OCEAN TREATY: STATUS QUO ON THE HIGH SEAS IS NOT AN OPTION

The relentless expansion of squid fisheries, particularly on the high seas, is a prime example of industrial activity impacting biodiversity when it is allowed to operate with impunity.

This year, governments will reach the final stage of negotiations for a new Global Ocean Treaty, defining the terms for protection of biodiversity in areas beyond national jurisdiction (ABNJs). Governments must ensure that the final text provides a strong Treaty, with comprehensive environmental obligations – particularly on environmental and strategic impacts assessments – and the power to establish fully or highly protected areas that allow marine life to recover.

It is of paramount importance that no human activities or sectors, including fishing, are excluded from the scope of the Treaty. These negotiations represent an historic opportunity to change ocean governance. There has never been a more pressing time to move away from a system primarily geared towards short-term rights for ocean exploitation, to one where governments are held accountable for marine conservation and the sustainable extraction of marine resources.

Currently, there is no effective mechanism for the protection of ABNJs. A strong Treaty could rectify this, placing conservation at the heart of ocean governance. That's why Greenpeace, together with scientists, civil society organisations, businesses and a growing number of political leaders, is calling on governments to agree to a strong Global Ocean Treaty that can help deal with both the lack of holistic management of the high seas, as well as provide protection to the incredible wildlife that lives there.

In the case of squid fisheries, the solutions are not immediate or simple due to the sheer size of the fleets targeting squid. A range of options have been suggested to address their management on the high seas, from the creation of a global management organisation to govern squid fishing globally, to the expansion of the mandate of existing regional bodies so as to include squid and other invertebrate fisheries. In some cases, the prospects for establishing regional bodies with the competence to manage these fisheries effectively are low, as in the South West Atlantic or the Western Indian Ocean. As we have seen with the SPRFMO, the existence of an RFMO with the competence to manage a squid fishery is not a guarantee of effective biodiversity protection. RFMOs with mandates for these fisheries must be fundamentally reformed to have conservation at their core. And while none of the options suggested seem to provide an effective solution, international cooperation remains crucial to avoid overfishing - especially for straddling populations like oceanic squid species.

> "Governments must ensure that the final text provides a strong Treaty, with comprehensive environmental obligations – particularly on environmental and strategic impacts assessments – and the power to establish fully or highly protected areas that allow marine life to recover."

"Major gaps in ocean governance have resulted in unprecedented threats to squid populations and, more broadly, the high seas as a whole. Governments can and must address this crisis by urgently agreeing a robust Global Ocean Treaty that moves beyond the status quo and is capable of protecting our oceans and the billions of people who depend on them."

A strong Global Ocean Treaty would empower governments to put in place a representative and well-connected network of marine protected areas, including fully or highly protected areas, for critical habitats, following scientific recommendations and in coordination with, but not delegated to, relevant management bodies such as RFMOs. These could cover nursery, breeding and feeding grounds for marine species, as well as migratory routes for sea creatures and blue carbon ecosystems to help climate mitigation.

The creation and effective management of a network of ocean sanctuaries across the high seas will increase the protection and resilience of exploited marine species, supporting sustainable livelihoods and food security.

Within its provisions, the new Treaty should ensure that human activities which could potentially harm biodiversity in ABNJs, including fishing, are strictly assessed and effectively managed so that the marine environment is afforded comprehensive protection from the cumulative impacts of human activities on the ocean and climate change. This will help build resilience to climate change, ensure consideration of all potential and cumulative impacts, and inject precaution into management and decision-making processes.<sup>88</sup> A rigorous, modern and transparent **Environmental Impact Assessment framework** would also ensure that new fisheries, such as some of the squid fisheries we have discussed, cannot simply emerge out of nowhere without being subjected to further scrutiny.

The Global Ocean Treaty will not replace or undermine RFMOs, but complement and strengthen their work to ensure sustainability and comprehensive ecosystem health by filling gaps and improving cooperation among the management bodies responsible for the

regulation of specific activities on the high seas. The Global Ocean Treaty regime will also streamline biodiversity conservation in the work of existing bodies and support the gathering and sharing of data to help RFMOs to deliver on their conservation obligations, and progress ocean conservation and fisheries management as a whole. By providing scientific expertise and guidance, the Treaty will improve governments' ability, including through RFMOs, to minimise the harm that industrial fishing causes to the wider ocean, and instead act collectively to restore ocean health. By setting regular reporting requirements for State Parties, individually or collectively, and inviting RFMOs to do the same, the Treaty will contribute to enhancing accountability and transparency.

As highlighted in this report, major gaps in ocean governance have resulted in unprecedented threats to squid populations and, more broadly, the high seas as a whole. Governments can and must address this crisis by urgently agreeing a robust Global Ocean Treaty that moves beyond the status quo and is capable of protecting our oceans and the billions of people who depend on them. "It is of paramount importance that no human activities or sectors, including fishing, are excluded from the scope of the Treaty."

### REFERENCES

1 **Pauly, D., Zeller, D.** 2016. Catch reconstructions reveal that global marine fisheries catches are higher than reported and declining. Nat Commun 7, 10244. https://doi.org/10.1038/ ncomms10244

2 **Greenpeace International.** 2019. The Wild West Atlantic: The impact of overfishing in the South-West Atlantic Ocean. Available at https:// www.greenpeace.org/international/ publication/25452/the-wild-westatlantic/

3 **Greenpeace International.** 2021. High stakes: The environmental and social impacts of destructive fishing on the high seas of the Indian Ocean. Available at https://www.greenpeace. org/static/planet4-internationalstateless/2021/04/1a103d35-high-stakes. pdf

4 **Greenpeace Germany.** 2019. Ghost Gear: The Abandoned Fishing Nets Haunting Our Oceans. Available at https://www.greenpeace.org/ international/publication/25438/ghostgear/

5 **Greenpeace International.** 2020. Fishy Business: How transhipment at sea facilitates illegal, unreported and unregulated fishing that devastates our oceans. Available at https:// www.greenpeace.org/international/ publication/28803/fishy-business/

6 **Greenpeace International.** 2020. Deep Trouble: The murky world of the deep sea mining Industry. Available at https://www.greenpeace.org/ international/publication/45835/deepsea-mining-exploitation/

7 **Greenpeace International.** 2019. Sharks Under Attack: Overfished and under protected. A case study in the North Atlantic. Available at https://www.greenpeace.org/ static/planet4-internationalstateless/2019/06/34bc366c-sharksunder-attack-greenpeace-2019.pdf

8 **Greenpeace International.** 2020. Turtles Under Threat: Why the world's ultimate ocean wanderers need protection. Available at https://www.greenpeace.org/ static/planet4-internationalstateless/2020/01/48304cb0-turtlesunder-threat-greenpeace-report-2020. pdf

9 Formally known as an International Legally Binding Instrument under the United Nations Convention on the Law of the Sea on the Conservation and Sustainable Use of Marine Biological Diversity of Areas Beyond National Jurisdiction (See UNGA Resolution 72/249).

10 **Moustahfid, H. et al.** 2020. Ecological-Fishery Forecasting of Squid Stock Dynamics under Climate Variability and Change: Review, Challenges, and Recommendations. Reviews in Fisheries Science & Aquaculture, 29:4, 682-705, DOI: 10.1080/23308249.2020.1864720

"Cephalopod landings are dominated by squid fisheries, which represent nearly 80% of the worldwide cephalopod catches." Sauer, W. H. H. et al. 2019.
World Octopus Fisheries.
Reviews in Fisheries Science & Aquaculture, 29:3, 279-429, DOI: 10.1080/23308249.2019.1680603

12 "Some 30–40 squid species have substantial commercial importance around the world. Squid fisheries make a rather small contribution to world landings from capture fisheries relative to that of fish, but the proportion has increased steadily over the last decade, with some signs of recent levelling off." **Arkhipkin, A. I. et al.** 2015. World Squid Fisheries. Reviews in Fisheries Science & Aquaculture, 23:2, 92-252, DOI: 10.1080/23308249.2015.1026226

13 Ibid 1.

14 Anderson SC, Mills Flemming J, Watson R, Lotze HK. 2011. Rapid Global Expansion of Invertebrate Fisheries: Trends, Drivers, and Ecosystem Effects. PLoS ONE 6(3): e14735. https://doi. org/10.1371/journal.pone.0014735

15 **Ospina-Alvarez, A., de Juan, S., Pita, P. et al.** 2022. A network analysis of global cephalopod trade. Sci Rep 12, 322. https://doi.org/10.1038/s41598-021-03777-9.

16 **FAO.** 2020. The State of World Fisheries and Aquaculture: Sustainability in Action. 208 pp. Available at https:// www.fao.org/publications/sofia/2020/en/

17 **Arkhipkin, A. I. et al.** 2015. World Squid Fisheries. Reviews in Fisheries Science & Aquaculture, 23:2, 92-252, DOI: 10.1080/23308249.2015.1026226

- 18 Ibid 10.
- 19 Ibid 16.

20 In 2019, landings reported to the FAO by China (722,799 tonnes), Peru (538,281 tonnes) and Indonesia (224,030 tonnes) amounted to 1,485,110 tonnes or 59% of the 2,498,208 tonnes of squid reported to be landed.

- 21 Ibid 15.
- 22 Ibid 14.

23 "Cephalopod fisheries are routinely assessed and managed in several other countries, including Argentina, Australia, Canada, Chile, Falkland Islands, Japan, Mexico, New Zealand, Peru, Russia, and South Africa—but many important cephalopod fisheries in other

parts of the world are not assessed or managed." Arkhipkin, A. I. et al. 2021. Stock assessment and management of cephalopods: advances and challenges for short-lived fishery resources, ICES Journal of Marine Science, Volume 78, Issue 2, Pages 714-730, https://doi. org/10.1093/icesjms/fsaa038

- 24 Ibid 17.
- 25 Ibid 14.

26 See Fishing techniques. Industrial jigging, at https://www.fao.org/fishery/ en/fishtech/1114/en

27 Arkhipkin, A. I. et al. 2021. Stock assessment and management of cephalopods: advances and challenges for short-lived fishery resources, ICES Journal of Marine Science, Volume 78, Issue 2, Pages 714-730, https://doi. org/10.1093/icesjms/fsaa038

- 28 Ibid 14.
- 29 Ibid 27.
- 30 Ibid 10.
- Ibid 27. 31

32 Doubleday, Z. A. et al. 2016. Global proliferation of cephalopods. Current Biology, Volume 26, Issue 10, Pages R406-R407, https://doi.org/10.1016/j. cub.2016.04.002.

33 Ibid 15.

34 See articles 5 and 6 and Annex II of the Agreement for the Implementation of the Provisions of the United Nations Convention on the Law of the Sea of 10 December 1982 Relating to the Conservation and Management of Straddling Fish Stocks and Highly Migratory Fish Stocks.

35 Hunsicker, M.E., Essington, T.E., Watson, R. and Sumaila, U.R. 2010. The contribution of cephalopods to global marine fisheries: can we have our squid and eat them too?. Fish and Fisheries, 11: 421-438. https://doi.org/10.1111/j.1467-2979.2010.00369.x

36 Paragraph 3.3.2. [Unregulated fishing refers to fishing activities]: in areas or for fish stocks in relation to which there are no applicable conservation or management measures and where such fishing activities are conducted in a manner inconsistent with State responsibilities for the conservation of living marine resources under international law. FAO (2001). International Plan of Action to Prevent. Deter and Eliminate Illegal, Unreported and Unregulated Fishing.

- 37 Ibid 2.
- 38 Ibid 3.

39 FAO. (2021). Fishery and Aquaculture PERFORMANCE-REVIEW-FINAL.pdf Statistics. Global capture production 1950-2019 (FishstatJ). In: FAO Fisheries Division [online]. Rome. Updated 2021. www.fao.org/fishery/statistics/software/ fishstatj/en

40 "The data for the major fisheries show large interannual variations over the decade, by up to a factor of 5 in the case of I. argentinus, with no clear trends within or between species." Ibid 17.

41 Ibid 35.

42 Ibid 2.

43 Dirección de Operaciones. **Departamento Policía Auxiliar** Pesquera. Estadística de buques pesqueros identificados temporada 2020-2021. Available at https://www. argentina.gob.ar/prefecturanaval/ resumen-operativo/maritima-extranjera

44 Villasante, S. et al. 2015. Reconstruction of Argentina's marine fisheries catches (1950-2010). Fisheries Centre Working Paper #2015-50, University of British Columbia, Vancouver, 16 p. Available at http://www. seaaroundus.org/doc/publications/ wp/2015/Villasante-et-al-Argentina.pdf

45 China, for instance, has issued a recent Ministerial Circular to improve the management of its fleet of distant water fishing jiggers targeting squid, in light of "crowded fishing grounds on the high seas, low single-vessel output, declining market prices, and reduced corporate profits." The circular foresees a freeze in the number of jiggers, their distribution among ocean areas, or improve data collection and scientific work. However, flag State measures do not provide a multilateral solution for the management of straddling fish stocks. See Ministry of Agriculture and Rural Affairs (2021). Circular on Strengthening the Management of the Operation of the Distant Water Squid Jiggers.

#### 46 Miller NA, Roan A, Hochberg T. Amos J and Kroodsma DA. 2018. Identifying Global Patterns of

Transshipment Behavior. Front. Mar. Sci. 5:240. DOI: 10.3389/fmars.2018.00240.

47 Ibid 2.

48 SPRFMO. 2021. 9 th Scientific Committee meeting report. 79 pp. Wellington, New Zealand. Available at https://www.sprfmo.int/assets/2021-SC9/ Report/SC9-Report-Final.pdf

49 Ridings, P., Cole, M. A., Goldsworthy, M. L., & Kaye, P. S. 2018. Report of the South Pacific Regional **Fisheries Management Organisation** Performance Review Panel. Available at http://www.sprfmo.int/assets/ Basic-Documents/Convention-and-Final-Act/2018-SPRFMO-Performance-Review/2018-12-01-REPORT-SPRFMO-

50 The SPRFMO has 15 Commission Members and 3 Cooperating Non-Contracting Parties (see https://www. sprfmo.int/about/participation/).

See Article 4. Compatibility of 51 Conservation and Management Measures. SPRFMO. 2015. Convention on the Conservation and Management of High Seas Fishery Resources in the South Pacific Ocean. Available at http://www.sprfmo.int/assets/Basic-Documents/Convention-and-Final-Act/2353205-v2-SPRFMOConvention-text ascorrectedApril2010aftersignatureinFeb ruary2010 forcertification April 2010. pdf

52 Including inter alia data collection, assessment of the status of the population, genetic identification, control measures - in particular in relation to transshipments - or conservation and management measures, which may include provisions such as capacity and effort limits, catch limits or marine protected areas, as well as compatibility measures to ensure sustainability across the EEZs and the high seas.

53 See: https://globalfishingwatch.org/ about-us/

54 Global Fishing Watch. 2021. Analysis of the Southeast Pacific Distant Water Squid Fleet. Document GFW-2021-FA-SOUID2020. Available at https:// globalfishingwatch.org/wp-content/ uploads/GFW-2021-FA-SQUID2020-EN-1. pdf

55 See Table 4. Estimated number of Active Fishing vessels by Flag and Year in the SPRFMO Area based on Secretariat records of Active Vessels (not including carrier vessels) in SPRFMO. 2021. 9th Meeting of the Scientific Committee. Squid information held by the Secretariat. Document SC9-SQ01\_ rev1. Available at https://www.sprfmo.int/ assets/2021-SC9/SC9-SQ01-rev1-Squidinformation-held-by-the-Secretariat.pdf

56 Ibid 49.

57 See Table 1. Annual Catch weights (t) for Jumbo flying squid (GIS) as submitted to the SPRFMO Secretariat (post 1990) in SPRFMO. 2021. 9th Meeting of the Scientific Committee. Sauid information held by the Secretariat. Document SC9-SQ01\_rev1. Available at https://www.sprfmo.int/assets/2021-SC9/ SC9-SQ01-rev1-Squid-information-heldby-the-Secretariat.pdf

- 58 Ibid 54.
- 59 Ibid 55.
- 60 Ibid 54.

61 See for instance SPRFMO. 2021. China Annual Report - Squid. 9th

Meeting of the Scientific Committee. Document SC9-Doc28\_rev1. Available at https://www.sprfmo.int/assets/2021-SC9/ SC9-Doc28-rev1-China-Annual-Report-Squid.pdf

62 Following concerns about the failures of many regional fisheries management organisations to meet their obligations, particularly in relation to the conservation of marine ecosystems, many began processes to review and assess their performance in implementing relevant provisions of international law, including the United Nations Fish Stocks Agreement and other relevant instruments. Unfortunately, the recommendations from the review panels, which are not binding, have often not been followed through.

63 The panel noted for instance that "in the Jumbo flying squid fishery there are no catch limits, nor sufficient information to determine whether the current level of fishing effort is appropriate." Ibid 49.

64 The panel recommended, inter alia, "that the Commission strengthen the timelines for the submission and independent verification of catch and effort data for the Jumbo flving squid fishery", urged that "such measures to be adopted together with a general management measure for that fishery;" recommended that "the Commission take urgent action to implement management measures for the Jumbo flying squid fishery, and for precautionary measures to be put in place until sufficient information is available to undertake a reliable stock assessment", recognised "the progress in collating and analysing information about Jumbo flying squid and developing stock assessments but Considered that the absence of a precautionary management measure for the Jumbo flying squid is problematic;" recommended that "the Commission consider the implementation of fishing effort limits in the Jumbo flying squid fishery based on existing fishing capacity as a precautionary interim measure pending further scientific and management advice from the Scientific Committee." Ibid 49.

65 Ibid 49.

66 **SPRFMO** Conservation and Management Measure 18-2020 on the Management of the Jumbo Flying Squid Fishery, which entered into force on 1 January 2021. Available at https:// www.sprfmo.int/assets/Fisheries/ Conservation-and-Management-Measures/2020-CMMs/CMM-18-2020-Squid-31Mar20.pdf

- 67 Ibid 3.
- 68 WWF/Trygg Mat Tracking. 2020.

Unregulated fishing on the high seas of the Indian Ocean. The impacts, risks to, and challenges for sustainable fishing and ocean health. Available at https:// wwfeu.awsassets.panda.org/downloads/ wwftmt\_unregulated\_fishing\_on\_the\_ high\_seas\_of\_the\_indian\_ocean\_2020. pdf

69 See: https://www.tm-tracking.org/ about-tmt.

70 **Trygg Mat Tracking.** 2021. Squid Fishing in the Northwest Indian Ocean - Clear as Ink. Available at https://www. tm-tracking.org/post/new-analysissquid-fishing-north-west-indian-oceanclear-as-ink

- 71 Ibid 70.
- 72 Ibid 49.
- 73 Ibid 70.

74 **Undercurrent News** (December 8, 2021). US squid importers 'in the clear' after damning Indian Ocean report. Available at https://www. undercurrentnews.com/2021/12/08/ us-squid-importers-in-the-clear-afterdamning-indian-ocean-report/

- 75 See reference 45.
- 76 Ibid 71.
- 77 Ibid 35.
- 78 Ibid 14.

79 Semelparous species are those who have life histories characterised by death after first reproduction.

- 80 Ibid 17.
- 81 Ibid 32.

82 "Elevated temperatures, for instance, are thought to accelerate the life cycles of cephalopods, provided the optimal thermal range of the species is not exceeded and food is not limited. Further, it has been hypothesised that the global depletion of fish stocks, together with the potential release of cephalopods from predation and competition pressure, could be driving the growth in cephalopod populations." Ibid 32.

83 Ibid 35.

84 The concept of keystone species was introduced in the 1960s by ecologist **Robert T. Paine** and changed the field of ecology. Paine suggested that some species are more important than others in determining the structure and function of an ecosystem. See Österblom, H. Reimagining ocean governance using the keystone species concept. Nat Ecol Evol 1, 0133 (2017). https://doi.org/10.1038/s41559-017-0133 85 Ibid 17.

86 Arkhipkin, A. I. 2013. Squid as nutrient vectors linking Southwest Atlantic marine ecosystems, Deep Sea Research Part II: Topical Studies in Oceanography, Volume 95, 2013, Pages 7-20, https://doi.org/10.1016/j. dsr2.2012.07.003.

87 Ibid 17.

88 **Gjerde, K. M., Wright, G., & Durussel, C.** 2021. Strengthening high seas governance through enhanced environmental assessment processes: A case study of mesopelagic fisheries and options for a future BBNJ treaty. STRONG High Seas Project. http://doi. org/10.48440/iass.2021.001

89 **FAO** (2021). Fishery and Aquaculture Statistics. Global capture production 1950-2019 (FishstatJ). In: FAO Fisheries Division [online]. Rome. Updated 2021. www.fao.org/fishery/statistics/software/ fishstatj/en

90 Ibid 89.

- 91 Ibid 15.
- 92 Ibid 89.

93 Bell JB, Guijarro-Garcia E and Kenny A. 2019. Demersal Fishing in Areas Beyond National Jurisdiction: A Comparative Analysis of Regional Fisheries Management Organisations. Front. Mar. Sci. 6:596. DOI: 10.3389/ fmars.2019.00596

94 Ibid 89.

Lights from a squid vessel in the North Indian Ocean © Abbie Trayler-Smith / Greenpeace



Front cover: Juvneile Japanese flying squid, Pacific Ocean © Magnus Lundgren / naturepl.com

Published by Greenpeace International March 2022 greenpeace.org/30x30

