

November 2019



Dear head of ICCAT delegation:

We write to encourage actions at the upcoming annual meeting of the International Commission for the Conservation of Atlantic Tunas (ICCAT) toward more responsible fisheries management for Atlantic sharks. Our coalition focuses on conservation of sharks mainly because low reproductive capacity leaves most species exceptionally vulnerable to overfishing. For Atlantic shark populations relevant to ICCAT, we are particularly concerned about the lack of sound fishing limits as well as the inadequacy of compliance with existing measures and reporting of catch data.

**We request ICCAT measures to improve the outlook for highly migratory Atlantic sharks, specifically:**

- **A stronger finning ban through a requirement that sharks be landed with fins attached;**
- **A prohibition on retention in addition to bycatch mitigation for Shortfin Mako Sharks; and**
- **Catch limits for Blue Sharks.**

In addition, to improve shark fisheries management over the long term, we urge active support for:

- Adoption of the amendments to the ICCAT Convention text;
- Rigorous review and follow up action regarding non-compliance with existing shark measures; and
- Significantly increased observer coverage and catch reporting detail, particularly for longline fisheries.

### **Properly Enforcing the Shark Finning Ban**

We strongly support the proposal to strengthen ICCAT's ban on the wasteful practice of shark finning (slicing off a shark's fins and discarding the body at sea) by adding a requirement for all sharks to be landed with their fins still naturally attached, and are pleased that the list of co-sponsors is growing. An ICCAT prohibition on at-sea shark fin removal would bolster such bans adopted by the North East Atlantic Fisheries Commission (2014), the Northwest Atlantic Fisheries Organization (2016), the General Fisheries Commission for the Mediterranean (2018), and the Western Central Atlantic Fisheries Commission (2019). The "fins-naturally-attached" method is widely accepted as the best practice for enforcing finning bans. Such a rule could also facilitate sorely needed, species-specific data on Atlantic shark catches. Partially cutting and folding fins against the body can address safety and storage concerns.

### **Ensuring Blue Shark Sustainability**

Heavily fished Blue Sharks remain at risk for overfishing due to the lack of basic catch limits under ICCAT and major fishing nations. Immediate Blue Shark landings caps are supported by advice from ICCAT's Standing Committee on Research and Statistics (SCRS), the precautionary approach, and the benefits of consistent action across the Convention Area. The existing North Atlantic Blue Shark landing threshold is inadequate for ensuring that overages are prevented, while South Atlantic Blue Shark fishing remains essentially unregulated. We urge Blue Shark catch limits for both the North and South Atlantic at or below the average landing levels for the SCRS reference period (2009-2013).



## Preventing Collapse of Mako Populations

For over a decade, ICCAT's response to scientific advice on Mako Shark fishing has been wholly inadequate. Ecological Risk Assessments conducted in 2008 and 2012 ranked both Mako species very high for vulnerability to ICCAT fisheries. ICCAT has since skipped makos while banning take of many other shark species.

The International Union for the Conservation of Nature (IUCN) recently classified Shortfin Mako and Longfin Mako as Endangered on the IUCN Red List. These listings and growing public concern – particularly regarding the dire status of North Atlantic Shortfin Makos – weighed heavily in the August decision to include the two species on Appendix II of the Convention on International Trade in Endangered Species (CITES). The CITES listings bring immediate, binding obligations for all ICCAT Parties to ensure mako exports and landings from the high seas are sourced from legal, sustainable fisheries.

ICCAT's 2017 Shortfin Mako population assessment documented serious depletion and overfishing in the North Atlantic. In May, updated projections pushed the earliest possibility for recovery to 2045, five years later than predicted just two years ago. This scenario has a 53% chance of success if all mortality is ended. If annual Shortfin Mako catches from across the North Atlantic (including those discarded dead) are cut to below 300t in 2020, recovery is predicted to take 50 years (60% probability).

The SCRS has warned that the 2017 measure for North Atlantic Shortfin Makos is seriously insufficient to halt overfishing, and has reiterated their recommendation for a retention ban and additional measures to minimize discard mortality. Scientists noted that retention bans can be effective for significantly reducing Shortfin Mako mortality because post-release survival can be as high as 75%. While recommending South Atlantic Shortfin Mako catches not exceed 2001t, the SCRS flagged significant risk that this population may follow a path similar to that in the North. These warnings – in light of the CITES listings, species' similarity and vulnerability, enforcement challenges, catch data uncertainties, and the precautionary approach – argue for banning retention of both Mako species throughout the Atlantic.

## Conclusion

In short, unenforceable half measures are not sufficient to conserve vulnerable sharks. We are hopeful that, with help from your delegation, the important steps outlined above will be taken this year by ICCAT.

Thank you for considering our views. We look forward to seeing and working with you soon in Mallorca.

Sincerely,

Sonja Fordham  
Shark Advocates International

Shannon Arnold  
Ecology Action Centre

Ali Hood  
Shark Trust

Ian Campbell  
Project AWARE

*The Shark Trust is a UK charity working to safeguard the future of sharks through positive change.*

*Shark Advocates International is a project of The Ocean Foundation dedicated to securing science-based policies for sharks and rays.*

*Focused on sharks in peril and marine debris, Project AWARE is a growing movement of scuba divers protecting the ocean planet – one dive at a time.*

*Ecology Action Centre promotes sustainable, ocean-based livelihoods, and marine conservation in Atlantic Canada.*

*These groups have formed the Shark League ([www.sharkleague.org](http://www.sharkleague.org)) with funding from the Shark Conservation Fund.*