

November 9, 2015

The Honourable Hunter Tootoo
Minister of Fisheries and Oceans
200 Kent Street
Station 15N100
Ottawa, Ontario
K1A 0A6



Dear Minister Tootoo:

On behalf of our organizations, we are writing to congratulate you on your appointment as Minister of Fisheries and Oceans, and to urge Canadian government support for key shark conservation proposals at next week's annual meeting of the International Commission for the Conservation of Atlantic Tunas (ICCAT).

Our organizations focus on the conservation of sharks (and closely related rays) due in large part to the low reproductive capacity that leaves most of these species exceptionally vulnerable to overexploitation. We are troubled by the precarious status of pelagic sharks taken in ICCAT fisheries due to the lack of science-based fishing quotas, as well as poor compliance with existing limits and best practices.

Specifically, we urge Canada to:

- **Join the growing number Parties proposing a ban on removing shark fins at sea;**
- **End its opposition to a complete prohibition on the retention of porbeagle sharks;**
- **Support the establishment of catch limits to cap shortfin mako and blue shark landings; and**
- **Help amend the Convention to allow for more comprehensive elasmobranch conservation.**

The basis for these requests is detailed below.

An Enforceable Shark Finning Ban

We are pleased that the US, EU, Brazil and eleven other ICCAT Parties are collaborating toward a stronger ICCAT finning ban by proposing that all sharks be landed with their fins still naturally attached. The many practical advantages of the "fins-attached" method (from enhancing enforcement to facilitating improved data) surely have factored into the adoption of such rules for Canada's Pacific shark and Atlantic groundfish fisheries. For the sake of the resulting global benefits, we urge Canada to fully embrace this best practice, and to begin this year to actively support such a change at ICCAT.

Porbeagle Sharks

We remain deeply concerned over the status of porbeagle sharks (*Lamna nasus*), another exceptionally valuable shark species, one deemed *Endangered* in the Northwest Atlantic by Canadian scientists as well as the International Union for Conservation of Nature (IUCN). We once again strongly support the EU's proposal for an ICCAT prohibition on retention of this highly threatened species, and are hopeful that chances for success will be enhanced by the ongoing implementation of obligations under the Convention on International Trade in Endangered Species (CITES) and associated difficulties – for countries including leading harvester, Japan -- in developing positive non-detriment findings. We appreciate Canada's attempt to find a compromise through measures aimed at incidental porbeagle catches, but find that this proposal lacks clarity and falls short of the strict protection warranted for such a depleted and vulnerable species. We therefore urge Canada to reconsider and support a complete ICCAT ban on porbeagle retention, regardless of the state of the animal or manner of catch.

Shortfin Mako Sharks

We are deeply concerned about the lack of catch limits in place for the shortfin mako shark (*Isurus oxyrinchus*), one of the world's most valuable and vulnerable pelagic sharks. According to ICCAT's Standing Committee for Research and Statistics (SCRS):

- In ICCAT's three Ecological Risk Assessments (ERAs) since 2008, the shortfin mako has ranked 2nd or 3rd among 16 pelagic elasmobranch species with respect to vulnerability to ICCAT fisheries.
- Fishing mortality on shortfin mako sharks "should not be increased until more reliable stock assessment results are available for both the northern and southern stocks."
- "Precautionary management measures should be considered particularly for stocks where there is the greatest biological vulnerability and conservation concern, and for which there are very few data and/or great uncertainty in assessment results."

We recognize the pressing need for improved shortfin mako data with which to improve population assessments, and appreciate the proposed plan to do so over the next two years. In the meantime, however, biological vulnerability and status uncertainty in the face of high demand and fishing pressure continue to urgently warrant precautionary limits to at least cap mako landings. Given that ICCAT has taken stronger action for five shark species with lower ERA rankings, we see no excuse for continuing to leave mako sharks wholly unprotected from overfishing. We urge Canada to support ICCAT limits that at least cap mako landings.

Blue Sharks

We are disappointed that results from the latest stock assessment for blue sharks (*Prionace glauca*) remain highly uncertain, and that the SCRS was unable to reach consensus in terms of management advice for the North Atlantic population. As scientists point to lacking data as the major obstacle to more robust assessments, we are perplexed by Canadian reports of no landings and no discards of blue sharks, and urge immediate correction. In the meantime, a proposal for an ICCAT cap on blue shark landings is in line with the new SCRS recommendation that South Atlantic catches not increase, the precautionary approach, and the benefits of consistent action across the Convention Area. We request that Canada work with other delegations toward an ICCAT cap on blue shark landings.

Conclusion

We are hopeful that ICCAT will next week take not only these important shark conservation steps, but will also agree changes to the Convention text that will facilitate more comprehensive management of Atlantic elasmobranch fishing over time. We are eager to see Canada begin to accept and promote sound safeguards for sharks in this key arena.

Thank you for your consideration.

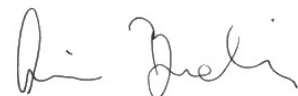
Sincerely,



Sonja Fordham
President
Shark Advocates International



Ali Hood
Director of Conservation
Shark Trust



Ania Budziak
Associate Director, Science and Policy
Project AWARE



Rebecca Regnery
Deputy Director, Wildlife
Humane Society International



Alejandra Goyenechea
Senior International Counsel
Defenders of Wildlife