

September 18, 2014

Veronika Veits
Head of Unit
International Affairs and Markets
European Commission
DG MARE
Rue Joseph II 99
B - 1049 Brussels



Dear Ms. Veits:

On behalf of our organizations, we are writing to encourage continued efforts by the European Union to ensure that next week's annual meeting of the Northwest Atlantic Fisheries Organization (NAFO) results in more responsible fisheries management for the region's elasmobranchs (sharks, skates, and rays).

Our organizations maintain a special focus on shark, skate, and ray conservation due in large part to the low reproductive capacity that leaves most of these species exceptionally vulnerable to overexploitation. We are deeply concerned about the precarious status of elasmobranchs caused by a lack of science-based fishing quotas and poor compliance with best practices.

Specifically, we greatly appreciate the EU's leadership with respect to proposing that NAFO strengthen its ban on shark finning (slicing off a shark's fins and discarding the body at sea) through a requirement that all sharks be landed with fins still naturally attached. We also strongly urge the EU to work to ensure a reduction in the 2015 NAFO skate total allowable catch (TAC) to no more than the level advised in recent advice from the NAFO Scientific Council (5,000t).

Given the important roles that elasmobranchs play in marine food webs, such actions also serve to support the application of an ecosystem approach as required in the amended NAFO Convention and Article 5 of the United Nations Fish Stocks Agreement.

A Science-Based Skate Quota

We remain seriously concerned about the status and management of thorny skate, also known in Europe as the starry skate (*Amblyraja radiata*). This species has been classified by the International Union for Conservation of Nature (IUCN) as *Vulnerable* globally and *Critically Endangered* off the US east coast.

The NAFO Scientific Council has demonstrated that:

- thorny skates have low resilience to fishing pressure due to low population growth rates;
- the Division 3LNO thorny skate population remains low and has shown little improvement under the NAFO management regime; and
- to improve the chances of recovery, 2013 skate catches should not exceed 5,000t (Div. 3LNO).

As you know, NAFO Parties have repeatedly failed to heed scientific advice for the skate limit. Given that Spain is the main player in the NAFO thorny skate fishery, the EU clearly has a key role in negotiation of the TAC, as well as an important responsibility to work to ensure the sustainability of this vulnerable species. Moreover, adherence to scientific advice is integral to the European *Community Plan of Action for Sharks*.

An Enforceable Shark Finning Ban

We are pleased that the EU is collaborating with the US in promoting prohibitions on at-sea shark fin removal at Regional Fishery Management Organizations (RFMOs) around the world. Adoption of this preferred method for finning ban enforcement at NAFO would significantly strengthen this region's only international safeguard for sharks and set a strong precedent for other RFMOs. We applaud your efforts to actively promote such a change, without exception.

You may be familiar with the 2010 expert report from the IUCN Shark Specialist Group and the European Elasmobranch Association¹, which details how under such a "fins-attached" policy:

- Enforcement burden is greatly reduced;
- Information on species and quantities of sharks landed is vastly improved; and
- "High-grading" (mixing bodies and fins from different animals) is impossible.

Conclusion

Setting the world's first RFMO TAC for a shark or ray was a major accomplishment for NAFO, and yet we maintain that this limit must be in line with scientific advice in order to ensure population rebuilding and reflect sound principles for fisheries management. The EU engaging in good faith is key to realizing that goal, as it is for NAFO leading the way toward strong RFMO finning bans through best practice enforcement standards.

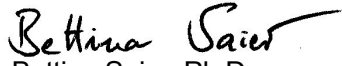
We are hopeful that, with your leadership, these important steps toward responsible elasmobranch fisheries management will be taken next week.

Thank you for your consideration.

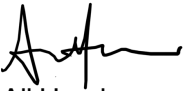
Sincerely,



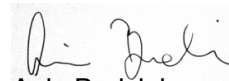
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Àlex Bartolí
Shark Specialist, Conservation Department
SUBMON

cc: Commissioner Maria Damanaki

¹ Fowler, S. and Séret, B. 2010. *Shark fins in Europe: Implications for reforming the EU finning ban*. European Elasmobranch Association and IUCN Shark Specialist Group.