



**HUMANE SOCIETY
INTERNATIONAL**



POSITION STATEMENT
SHARK & RAY CONSERVATION MEASURES
87th meeting of the
INTER-AMERICAN TROPICAL TUNA COMMISSION
Lima, Peru; July -14-18, 2014

Shark Advocates International, Humane Society International, Project AWARE, Shark Trust, and Defenders of Wildlife appreciate delegates' consideration of our views on key shark conservation issues currently being deliberated by the Inter-American Tropical Tuna Commission (IATTC). Our organizations maintain a special focus on shark and ray conservation due in large part to the low reproductive capacity that leaves most of these species exceptionally vulnerable to overexploitation. We remain deeply concerned about the deteriorating status of these and related species caused by the lack of species-specific safeguards and poor compliance with existing IATTC rules. Our recommendations and concerns are detailed below.

EU PROPOSAL ON SHARK FINNING

Our organizations applaud the EU for leadership in promoting the prohibition of at-sea shark fin removal as the best practice for enforcing bans on shark finning (slicing off a shark's fins and discarding the body at sea). We wholeheartedly agree with the EU that the only way to guarantee that sharks are not finned is to require that the trunks be landed with the fins attached. We caution against allowing any exceptions that allow continuation of the flawed fin-to-carcass ratio system, as they would negate the opportunity for meaningful change.

Specifically, we urge the Parties to adopt a prohibition on the removal of shark fins on-board vessels, as well as the retention, transshipment, and landing of shark fins that are not naturally attached to carcasses, without exceptions.

As detailed in a 2010 expert report from the IUCN Shark Specialist Group and the European Elasmobranch Association¹, under such a policy:

- Enforcement burden is greatly reduced
- Information on species and quantities of sharks landed is vastly improved
- "High-grading" (mixing bodies and fins from different animals) is impossible
- Value of the finished product can be increased.

The technique of making a partial cut and folding fins against the body can address industry concerns about safety and efficient storage. Costa Rican and EU fishermen are using this practice effectively for frozen as well as fresh sharks.

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.

Shark Advocates International, a project of The Ocean Foundation, works to safeguard sharks & rays through sound, science-based conservation policy. Supporting work in more than 35 countries, Humane Society International is one of the only international organizations working to protect all animals.

The Shark Trust is a UK charity working to advance the worldwide conservation of sharks through science, education, influence and action.

Project AWARE Foundation is a growing movement of scuba divers protecting the ocean planet – one dive at a time.

Defenders of Wildlife is dedicated to the protection of all native animals and plants in their natural communities.

Because of the many practical advantages associated with the fins naturally attached method, the policy has been mandated by not only the EU, but several Central and South America countries, the U.S., Chinese Taipei, and others; and is gaining acceptance in international arenas.

We urge the IATTC to take the lead within the world's tuna Regional Fishery Management Organizations by being the first to adopt this best practice for preventing shark finning.

IATTC STAFF RECOMMENDATIONS ON MOBULA RAYS

We greatly appreciate the continued leadership from the IATTC staff with respect to the **manta and devil rays** (family Mobulidae) taken in IATTC purse seine fisheries. The five relevant species are included on the IUCN Red List as Vulnerable (*Manta birostris*), Near Threatened (*Mobula japonica*, *M. munkiana*, and *M. thurstoni*), or Data Deficient (*M. tarapacana*). These large rays share sharks' inherent susceptibility to overexploitation in terms of low reproductive capacity. A particularly cautious approach is warranted with respect to both handling of individuals and management of fishing mortality. Overexploitation of manta rays, in particular, squanders the significant economic potential of eco-tourism for many tropical islands and coastal communities. Global concern for these species' status is growing, as evidenced by the 2011 listing of *Manta birostris* on Appendix I & II of the Convention on Migratory Species, and the 2013 listing of *M. birostris* and *M. alfredi* on Appendix II of the Convention on International Trade in Endangered Species.

We strongly support the IATTC staff recommendations aimed at safe, live release of incidentally caught manta and devil rays: IATTC prohibitions on retention and other particularly lethal practices: gaffing, lifting by the gill slits or spiracles, and punching holes in the wings. We also urge adoption of the recommended IATTC requirements for:

- Rays too large to be lifted safely by hand being brailed out of the net using methods such as those in the WCPFC document cited by staff (Poison *et al.* 2012); and
- Large rays that cannot be released safely before being landed on deck being returned to the water as soon as possible, preferably using a ramp from the deck to an opening on the side of the vessel, or lowered with a net.

EU PROPOSAL ON SILKY SHARKS

We share others' concern over reported declines in **silky sharks** (*Carcharhinus falciformis*) in the Eastern Pacific Ocean (EPO), and strongly support precautionary measures to rebuild these populations. To that end, we support the EU proposal to prohibit silky shark retention, transshipment, landing, storing, and sale (except for biological sampling). At the very least, we urge the Commission to adopt the IATTC staff recommendations to prohibit silky shark retention by purse seine vessels and establish various fishing limits aimed at reducing silky shark mortality for other vessels.

RELATED MEASURES

Finally, we express our strong support for related recommendations from the IATTC staff and the Scientific Advisory Committee, some of which are reflected in the EU silky shark proposal:

- Mandatory reporting of fishing effort and shark catches by species (for all vessels);
- Continued work on shark and ray bycatch mortality mitigation techniques, live release guidelines, and post-capture survival research, with priority given to those gears with the substantial catches;
- Ecological Risk Assessments, particularly for hammerhead and silky sharks;
- Increased observer coverage to ensure reliable monitoring of shark bycatch and status upon release; and
- Greater funding for projects promoting shark data collection, research, and conservation.