



**POSITION STATEMENT**  
**SHARK & RAY CONSERVATION MEASURES**  
*89<sup>th</sup> meeting of the*  
**INTER-AMERICAN TROPICAL TUNA COMMISSION**  
*Guayaquil, Ecuador; June 29 - July 3, 2015*

Our organizations appreciate delegates' consideration of our views on shark and ray conservation issues currently being deliberated by the Inter-American Tropical Tuna Commission (IATTC). We maintain a special focus on shark and ray conservation based on the low reproductive capacity that leaves most of these species exceptionally vulnerable to overexploitation. We remain deeply concerned about the deteriorating status of these species caused by a lack of safeguards. Our recommendations on current proposals that would begin to address these concerns are detailed below.

### **COSTA RICA AND EU PROPOSALS ON SHARK FINNING**

Our organizations applaud Costa Rica and 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 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*.

In 2010, the IUCN Shark Specialist Group and the European Elasmobranch Association<sup>1</sup> found that 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.

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 for frozen as well as fresh sharks.

Because of the many practical advantages associated with the fins naturally attached method, the policy has been mandated by the EU, many Central and South America countries, the U.S., and others. It is also gaining acceptance in international arenas, as demonstrated by last year's adoption by the North East Atlantic Fisheries Commission and by the ever-increasing number of co-sponsors for proposals at the International Commission for Conservation of Atlantic Tunas. We urge the IATTC to take the lead this year by becoming the first tuna Regional Fishery Management Organization to adopt this best practice for preventing shark finning.

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<sup>1</sup> 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.*

*WildAid works to reduce global consumption of wildlife products by persuading consumers and strengthening enforcement.*

*The Manta Trust co-ordinates global research and conservation efforts for manta rays, their close relatives and their habitat.*

*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.*

## **EU PROPOSAL ON MOBULID RAYS**

We greatly appreciate the leadership by the IATTC staff and the EU with respect to safeguarding manta and devil rays (family Mobulidae) taken in IATTC fisheries. The five relevant species are included on the IUCN Red List as Vulnerable (*Manta birostris*), Near Threatened (*Mobula japanica*, *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. With all mobulid rays now listed on Appendix I and II of the Convention on Migratory Species (CMS), and the listings for manta rays on Appendix II of the Convention on International Trade in Endangered Species (CITES) now in force, Parties' intentions and obligations to safeguard these particularly vulnerable species are mounting. Specifically, CMS Parties are required to strictly protect mobulids while CITES Parties are obligated to restrict international manta ray trade to that which can be demonstrated to be the result of sustainable and legal fishing through non-detriment findings.

Given these factors, we strongly support the EU's proposal aimed at safe, live release of manta and devil rays. In other words, we urge Parties to agree to prohibit retention, landing, sale, storage, and transshipment as well as harmful practices (gaffing, lifting by gill slits or spiracles, punching holes in wings), mandate prompt and careful release following IATTC staff guidance, and ensure that numbers of discarded and released mobulids as well as their status are recorded and reported to IATTC.

## **EU PROPOSAL ON SILKY SHARKS**

We share others' concern over reported declines in silky sharks (*Carcharhinus falciformis*) in the Eastern Pacific Ocean, and strongly support precautionary IATTC limits for these populations. The SAC recently warned that immediate implementation of such measures is critical to rebuilding. Because of the vulnerability of this species and the extent of declines, we continue to support the 2014 EU proposal to fully prohibit silky shark retention, transshipment, landing, storing, and sale. We assume that this year's proposal allows for some silky shark landings with the aim of ensuring adoption of basic management and reducing fishing mortality, as recommended by scientists. We are hopeful that Parties can, at the very least, accept this proposal to safeguard silky sharks while Ecological Risk Assessment and conservation efforts evolve. Specifically, we support proposed measures to prohibit retention of silky sharks in fisheries not targeting this species, time/area closures for directed fisheries, limit take of juveniles, mandate TAC-based management plans, promote bycatch mortality mitigation, and increase observer coverage. We note this proposal is in line with the CMS Parties' commitment to work regionally toward the conservation of silky sharks.

## **US PROPOSAL ON HAMMERHEAD SHARKS**

The International Union for Conservation of Nature (IUCN) has highlighted key species of hammerhead sharks as the most threatened semi-pelagic/pelagic sharks in the world. Scalloped hammerhead sharks (*Sphyrna lewini*) and great hammerheads (*Sphyrna mokarran*) are included on the IUCN Red List as Globally Endangered. Accordingly, we supported the 2013 EU proposal to prohibit retention, transshipment, landing, storage, and sale of sharks in the family Sphyrnidae. We have stressed that, as hammerhead sharks are largely coastal (rather than oceanic) species, complementary, national measures are essential to reversing population declines.

As with silky sharks, we appreciate that compromise may unfortunately be necessary to initiate much-needed, basic management while Ecological Risk Assessments and conservation efforts evolve. We therefore urge Parties to adopt, at the very least, US proposals to prohibit retention, landing, transshipment, storage, and sale, and to require prompt, careful release in fisheries not targeting hammerheads, allow hammerhead targeting only under TAC-based management plans subject to review by the IATTC SAC, promote research into habitat needs, restrict biological sampling to SAC-approved projects, encourage work on bycatch mitigation, promote associated capacity building, and ensure that numbers of discarded and released hammerheads as well as their status are recorded and reported to IATTC. We note that this proposal is in line with CMS Parties' commitment to cooperative regional conservation as well as CITES Parties' obligations to restrict international hammerhead trade to that which can be demonstrated through non-detriment findings to be the result of sustainable and legal fishing.