

## Position Statement for the 101<sup>st</sup> Session of the Inter-American Tropical Tuna Commission and Response to the IATTC 101<sup>st</sup> Commission Meeting Proposals

**Sharks and rays are in a crisis** – globally and in the Eastern Pacific as apparent from the outcome of the comprehensive vulnerability assessment of 32 shark species conducted in 2022 by the IATTC staff. “Estimates of a proxy for fishing mortality ( $F_{2019}$ ) and the spawning stock biomass per recruit (SBR<sub>2019</sub>) for the reference year 2019 exceeded biological reference points ( $F_{40\%}$  and SBR<sub>40%</sub>) for 20 of these species, classifying them as most vulnerable, including 4 species of hammerhead sharks, 10 species of requiem sharks, 2 species of thresher sharks, 3 species of mesopelagic sharks, and the commercially important species, blue shark and shortfin mako.<sup>1</sup>

**No data means no certainty, and without certainty no management measures are implemented** – this vicious circle caused by poor reporting and a lack of precautionary management at IATTC must be ended. Once overfished many of these species will require decades for population rebuilding. Therefore, limiting now mortality of oceanic shark populations by precautionary management measures should be identified as a priority.

**Despite Article VII, paragraph 1 (f) of the Antigua Convention** requiring that the Commission shall “adopt, as necessary, conservation and management measures and recommendations for species belonging to the same ecosystem and that are affected by fishing for, or dependent on or associated with, the fish stocks covered by the Convention, with a view to maintaining or restoring populations of such species above levels at which their reproduction may become seriously threatened” **IATTC still lacks effective management measures to protect some of the most vulnerable shark species from unsustainable depletion of populations and overfishing**, although sharks are undoubtedly covered by the convention.

As a follow up on the earlier assessment the EASI-Fish ecologically risk assessment approach developed by IATTC staff for data-limited species and fisheries was used to test “43 hypothetical scenarios involving practical conservation and management measures (CMMs)—used in isolation and concert—to guide future research and management efforts” for 3 species of hammerheads and silky sharks.<sup>2</sup> Concluding that “the most effective mitigation measure for these sharks is to avoid interaction with EPO fisheries”<sup>2</sup>, e.g. by time and, or spatial fishery closures should demonstrate the urgent implementation of combined alternative measures before closures may be the only remaining option, as those would of course have significant socio-economic impacts on fisheries, reducing catches of the target species, tuna and billfish. Increasing gear selectivity, reducing bycatch mortality, and removing economic incentives from *Finning* and the retention of bycatch of vulnerable shark species need to be evaluated in combination rather than as singular measures.

**SHARKPROJECT** therefore welcomes that so many CPCs have in reply to these findings stepped up this year proposing substantial improvements in extending and harmonising existing shark CMMs. Especially closing the long-time IATTC loophole with regard to *Finning* as requested repeatedly by us and many other NGOs must be addressed without further delays. It is our [stated position that all fisheries interacting with sharks either as a targeting or a bycatch species must comply with a Fins Naturally Attached policy - without exemptions](#). When combined with adequate monitoring of compliance via independent observation by electronic monitoring systems and/or human observers this is globally acknowledged to be the only truly effective measure to prevent *Finning*. The fin to carcass ratio currently applied at IATTC is

<sup>1</sup> Griffiths, S.P., Fuller, L.M., Potts, J., Nicol, S., 2022. Vulnerability assessment of sharks caught in eastern Pacific Ocean pelagic fisheries using the EASI-Fish approach. *13th Meeting of the Scientific Advisory Committee of the IATTC, 16-20 May 2022, La Jolla, California, USA. Document SAC-13-11*, 80.

<sup>2</sup> Griffiths, S., Siu S., Hutchinson M., Lopez J., Aires-da-Silva, A. Vulnerability assessment and simulation of potential conservation and management measures for silky sharks and hammerhead sharks caught in eastern Pacific Ocean pelagic fisheries. *14th Meeting of the Scientific Advisory Committee of the IATTC, 15-19 May 2023, La Jolla, California, USA Document SAC-14-12; <https://www.iattc.org/GetAttachment/fc75f0b9-ec17-492e-bc74-4844ef15281e/SAC-14-12>*

completely inadequate to achieve this as it is impossible to monitor and prevents successful prosecution of *Finning* as non-compliance with the existing ban is difficult to prove.

This year a large number of CPCs have indeed proposed introducing Fins Naturally Attached either in proposals to **strengthen RESOLUTION C-05-03** (Proposal IATTC-101 C-1 submitted by European Union) or in proposals to combine and amend several shark CMMs into a new resolution: Proposal IATTC-101 C-4 submitted by Canada and Proposal IATTC-101 C-5 submitted by Belize, Costa Rica, El Salvador, Guatemala, Nicaragua and Panama and many observer statements from the industry have .

**We urge the Commission to follow global best practice and the recommendation of IATTC staff made in 2023<sup>3</sup> to adopt Fins Naturally Attached this year, prohibiting the removal, retention on board, transshipment, or landing of any fins that are not naturally attached to the carcass of the animal.**

**Proposal IATTC-101 C-4 submitted by Canada** also includes helpful definitions to improve clarity and remove potential misinterpretations in existing resolutions. Especially the definition of shark as including all species of sharks, skates, sawfish and chimaeras is very much appreciated as emphasizing that not only true sharks (Selachimorphae) but also other Chondrichthyes should be covered by the proposed measures. Also, the proposed extension of the existing reporting requirements for silky sharks and hammerhead sharks to all sharks and the combined ban of shark lines and wire leader in all fisheries targeting tuna and/or billfish are important measures to reduce shark bycatch and increase chances for survival of released sharks. As already suggested by the proponents of **Proposal IATTC-101 C-5** submitted by Belize, Costa Rica, El Salvador, Guatemala, Nicaragua, and Panama this proposal includes many similarities to the Canadian proposal.

**We therefore encourage all the supporting CPCs, but also the European Union in working together** and to agree on an aligned content and wording for a comprehensive shark conservation measure being adopted during this year's Commission Meeting.

**We however do not support Proposal IATTC-101 C-3 Rev** submitted by Columbia as the proposed total cut of the upper part of the lobe fin will allow those to be completely removed and thereby creates a new loophole weakening a Fins Naturally Attached policy. We therefore sincerely hope that Columbia will be able to join the group of proponents of fins naturally attached regulation without exemptions.

**We fully support the proposed best release handling measures by several CPCs** specifying further details for longline fisheries such as not to remove sharks from the water and having line cutters on board to cut the sharks free as closely to the hook as possible to minimise the length of trailing lines. However, we note that best practices for avoidance, mitigation and improved post release survival differ between gear types and should be specified for different shark species, as different species show different vulnerability for various gear types and e.g., juvenile silky sharks and oceanic whitetip sharks, but also manta rays and mobulids require specific measures also for purse seine gear. Avoiding shark bycatch in the first place should therefore always be the priority and existing measures to reduce bycatch mortality should be subject to a periodic review to continuously improve their effectiveness.

**Proposal IATTC-101 I-1** submitted by the United States amends resolution C 21-06 to prolong specific measures to limit catches of silky sharks by another two years until 2025. **While we welcome and support the initiative to at least prolong these existing measures**, we note that the current regulation is very complex and difficult to monitor and to enforce, especially in light of the still far too low level of independent monitoring on board of longlining vessels. Limiting the bycatch of silky sharks in surface longline fisheries to 20% of total catch in weight and the catch of juveniles in multispecies longline fisheries using surface longlines to 20% of the caught number of individuals of silky sharks and banning the use of steel leaders (shark wires) for the consecutive years for a period of three months every year, if the 20% limit has been exceeded, may in the absence of precautionary total mortality limits, catch allocations and effective bycatch mitigation measures, not be sufficient to lower the overall mortality of silky sharks to sustainable levels.

Silky sharks and the three species of hammerheads have been identified as the most "highly vulnerable" shark species in the Convention area and silky sharks face high mortality even when bycatch in dFAD purse seine fisheries is released alive. Other RFMOs have therefore adopted retention bans for this species, excluding only subsistence fishing, to remove all incentives to target silky sharks as part of the international fin trade.

---

<sup>3</sup> <https://www.iattc.org/GetAttachment/a9d597d1-3f0c-412c-a51d-135c327c1553/SAC-14-14>

**Therefore, we encourage all parties to agree to already task the Working Group on Bycatch and the Scientific Advisory Committee** to develop comprehensive conservation measures in 2024 for implementation in 2025 for silky sharks, hammerhead sharks, and the other identified “vulnerable” shark species at IATTC, including mako sharks, and blue sharks. In the absence of reliable stock assessments at least total mortality limits should be defined following a precautionary approach. Mortality reporting (including discards) at species level must be strengthened overall but also scientific reference points for a precautionary harvest strategy should be developed at least for industrially targeted species.

We support **Proposal IATTC-101 F-1 submitted by Ecuador** to amend resolution C-19-08 on scientific observers for longliners, increasing **minimum observer coverage for longliners of more than 20 m in a stepwise approach to 100% by 2027 having either human observers and/or an electronic monitoring system (EMS) on board** in line with predefined and approved minimum requirements by the Commission as to the specification of such a system. Stepping up coverage to 20% already in 2024 as also recommended by IATTC staff is a much appreciated and long-time overdue step as inadequate reporting of catches, bycatch data and discards has repeatedly hindered or even prevented the implementation of adequate conservation measures and the sustainable management of all stocks, including shark species and other ETP species.

**We hope the Commission will adopt the resolution this year after having failed to do so last year.**

Furthermore, we also hope to see improved independent monitoring for smaller longline vessels as many longlining vessels catching sharks are less than 20 meters and including artisanal fishing vessels. Due to the large number of those smaller vessels, they cause significant impact on sharks, often targeting them although calling it a bycatch. Therefore, also those smaller vessels should have at least some type of electronic monitoring albeit less complex and less expensive systems may suffice especially for artisanal fisheries.

**FAD Proposals submitted by the European Union, the USA and Ecuador** raising concerns about the slow progress at IATTC to move to mandatory use of only fully non entangling and fully biodegradable dFADs addressing the improvements to the design of dFADS and to improve removal of other constructions, especially when found abandoned. We welcome the suggested immediate transition to fully non entangling materials as had also been suggested by the Scientific Advisory Committee and the phased transition to bio-degradable materials although the proposed timeline till 2030 should be reduced.

It should however also be highlighted that today drifting FADs constitute the major gear for catching tuna and tuna like species in all tuna RFMOs although known to generate massive impact on ecosystems and causing massive bycatch, including juvenile tuna and sharks. Therefore, effective bycatch avoidance and mitigation measures are urgently required as part of dFAD management.

Our stated [position for dFAD management therefore calls for a comprehensive strategy to continuously reduce observed and unobserved bycatch and improved dFAD management.](#)

**SHARKPROJECT** thanks all CPCs for their commitment to shark conservation and calls to the Commission to make a real difference for sharks at this year’s Commission Meeting by strengthening conservation measures to reduce mortality, mandate improved reporting, and initiate development to effectively managing shark populations in the Eastern Pacific Ocean.

**Contact:**

Dr. Iris Ziegler  
Head International Cooperation  
[i.ziegler@sharkproject.org](mailto:i.ziegler@sharkproject.org)  
SHARKPROJECT International

SHARKPROJECT International is a marine conservation NGO focusing on healthy marine ecosystems and healthy shark populations, a ‘conditio sine qua non’ for healthy oceans that can support seafood supplies for this and future generations and are able to contribute to combatting climate change. Therefore, SHARKPROJECT continues calling for a global [transition to an ecosystem based fishery management](#), for ALL stocks, whether a target species or a bycatch, applying best available science and in the absence of sufficient data following a precautionary approach to immediately stop overfishing and start rebuilding overfished stocks with a high probability of success in the fastest possible time.