



POSITION STATEMENT
SHARK & RAY CONSERVATION MEASURES
94th meeting of the
INTER-AMERICAN TROPICAL TUNA COMMISSION
Bilbao, Spain -- July 2019

Our organizations appreciate the opportunity to offer our perspective on Inter-American Tropical Tuna Commission (IATTC) conservation measures for sharks and rays. We focus on these species because of the low reproductive capacity that leaves most of them particularly vulnerable to overexploitation. We remain deeply concerned about the perilous status of shark and ray populations in the Eastern Pacific, and the associated lack of basic safeguards. Our recommendations for measures that could begin to address these concerns are detailed below.

We take this opportunity to remind IATTC CPCs of their binding obligations toward conservation of numerous threatened Eastern Pacific elasmobranch species made through listing on the Appendices of the Convention on International Trade in Endangered Species (CITES) and the Convention on the Conservation of Migratory Species of Wild Animals (CMS):

- **Hammerheads and Silky Sharks:** Listed on CITES Appendix II and CMS Appendix II
- **Whale Sharks and Mobula Rays:** Listed on CITES Appendix II and CMS Appendix I & II

As Parties to CITES, all but two IATTC CPCs are obligated to restrict international trade in products from the above species to that which can be demonstrated as sourced from sustainable and legal fishing operations, and to employ a permit system to track this trade. The ten IATTC CPCs that are also Parties to CMS (Bolivia, Chile, Costa Rica, Ecuador, EU, France, Honduras, Liberia, Panama, and Peru) are obligated to strictly protect Whale Sharks and Mobula Rays, and have committed to collaborate regionally to conserve these species as well as Hammerheads and Silky Sharks. To date, implementation of these international conservation commitments is seriously lacking.

MOBULID RAYS

Manta and Devil Rays (family Mobulidae) are the least fecund fish taken in tuna fisheries, with females giving birth to as few as one pup every two to three years. While we applauded the IATTC's groundbreaking 2015 prohibition on retention, landing, transshipment, and sale of these species, we remain concerned that associated exceptions for small-scale fisheries allow for substantial damage to their exceptionally vulnerable populations. We urge CPCs to unilaterally prohibit take and mandate careful release of all Mobula Rays and work to remove exceptions in the IATTC measure. In addition, we strongly support the recommendation for a pilot study into mobulid post-release survival (in all purse seine set types) made by the IATTC staff as well as the Working Group on Bycatch and the Scientific Advisory Committee.

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.

WHALE SHARKS

The rising extinction risk facing Whale Sharks (*Rhincodon typus*) was reflected in the species' 2016 IUCN classification as Globally Endangered. The recovery of Whale Shark populations is threatened primarily by incidental take in fisheries. We support Venezuela's proposal for a stand-alone Whale Shark Resolution (separate from C-18-05 on FADS) to more clearly mandate measures intended to prevent vessels from setting purse seines on whale sharks, maximize the chances for safe release of unintentionally encircled individuals, and mandate detailed reporting of such encounters.

SILKY SHARKS

Dramatic population declines have sparked global concern for silky sharks (*Carcharhinus falciformis*). IATTC scientists have stressed that precautionary measures are critical and urgent for population rebuilding in the Eastern Pacific. Accordingly, we remain concerned that current IATTC measures for silky sharks, proposed for extension, fall short of the scientific advice. *At a minimum*, we urge adoption of the following safeguards recommended and proposed previously:

- Prohibit retention and ensure prompt safe release of incidentally caught silky sharks, allowing exceptions for only unintentional purse seine catch if surrendered to authorities at landing (not sold or bartered);
- Declare and manage targeted silky shark fisheries, based on advice and approval of IATTC scientists;
- Limit retention of juveniles under 100 cm to 20% of total silky shark catches per trip; and
- Close targeted silky shark fisheries for three consecutive months of each calendar year.

There is no evidence that the status of Eastern Pacific Silky Sharks is improving under the status quo. We therefore urge CPCs to resist a roll-over of inadequate restrictions and instead strengthen them, in line with scientific advice and the precautionary approach that is so clearly warranted. Such action could facilitate proper implementation of the CITES listing.

HAMMERHEAD SHARKS

The IUCN has highlighted great and scalloped hammerhead sharks (*Sphyrna mokarran* and *Sphyrna lewini*) as the most threatened semi-pelagic/pelagic sharks in the world. Given this dire status, our organizations continue to support a full IATTC prohibition on hammerhead shark retention. At the very least, basic limits to guard against further depletion should be enacted while regional population assessments are developed. Such actions are also warranted for CITES compliance.

SHARK FINNING

We continue to strongly support a prohibition on at-sea shark fin removal as the best practice for enforcing the IATTC finning ban. Because of its many practical advantages, the fins-naturally-attached method is mandated in the EU, Central America, Canada, the United States, and much of South America. The policy has also gained overwhelming acceptance in international arenas, as evidenced through adoption by the North East Atlantic Fisheries Commission (NEAFC) and the Northwest Atlantic Fisheries Organization (NAFO), and the General Fisheries Commission for the Mediterranean (GFCM), as well as through support from the vast majority of International Commission for Conservation of Atlantic Tunas (ICCAT) CPCs. We once again urge the IATTC to prohibit without exception removal of shark fins on-board vessels, as well as the retention, transshipment, and landing of fins that are not naturally attached to carcasses.

ADDITIONAL OVERARCHING MEASURES

IATTC staff have repeatedly warned of serious deficiencies related to the fisheries data needed for shark population assessment. We strongly support their advice for addressing these persistent problems, including recommendations to:

- Establish an IATTC field office in Central America to facilitate long-term sampling of artisanal shark fisheries;
- Require vessel captains to record and declare all transshipments of sharks by species; and
- Substantially increase observer coverage requirements for both purse seine and longline vessels.

To better safeguard sharks while catch data and population assessments are improved, we reiterate our support for:

- Bans on the use of "shark lines" for longline vessels targeting tuna or swordfish; and
- Continued study of means for minimizing shark bycatch and related mortality.