

July 4, 2011



**HUMANE SOCIETY
INTERNATIONAL**

Dr. Guillermo A. Compeán
Executive Director
Inter-American Tropical Tuna Commission
8604 La Jolla Shores Drive
La Jolla, California 92037-1508



Dear Dr. Compeán:

On behalf of our organizations, we are writing to express our views with regard to potential conservation actions for sharks and rays at this week's annual meeting of the Inter-American Tropical Tuna Commission (IATTC). We respectfully request that you distribute this letter to the IATTC Parties.

We strongly support proposals from the European Union (EU) and Japan for the protection of oceanic whitetip sharks as a top priority for the IATTC. We also appreciate and support the EU proposal to protect hammerheads. We are deeply concerned, however, that the pressing problems of overexploitation of silky sharks and poor compliance with existing IATTC rules (on finning and live release) have yet to be addressed by additional proposals, and we urge such action. Our positions on these matters are detailed below.

Oceanic Whitetip Shark Protection

We strongly support the efforts of the EU and Japan to prohibit the retention, transshipment, landing, storing, selling, and offering for sale any part or whole carcass of oceanic whitetip sharks (*Carcharhinus longimanus*). We prefer the EU proposal to that of Japan because operative paragraph 2 specifically calls for fishermen to promptly release the sharks unharmed.

As you may recall from presentations from IATTC scientists, the index of relative abundance of oceanic whitetip sharks (derived from floating object set data) from the mid 1990s to 2009 has declined dramatically. The IUCN has classified oceanic whitetip sharks as Globally Vulnerable with a decreasing trend under the IUCN Red List of Threatened Species. As noted by the EU, this species has ranked high in ecological risk assessments, can survive capture relatively well, is easily identifiable at sea, warrants a precautionary approach to management, and is therefore well-suited for full prohibitions on take.

Silky Shark Protection

Scientists have also documented marked reduction since the mid 1990s in the relative abundance of silky sharks (*Carcharhinus falciformis*), a dominant species in the shark bycatch of IATTC tuna fisheries. To stem this decline, we urge adoption of the recommendation for purse seine fisheries included within the presentation for "Best Options for Mitigation" considered at the 2010 technical meeting on sharks: Closure of area north of 8° N to fishing on floating objects. This recommended measure was based on a thorough scientific analysis of the issue¹ and is aimed at closing regions associated with high bycatch of juvenile silky sharks without incurring large reductions in tuna catch. We would support a prohibition on silky shark retention in all IATTC fisheries as a complement and/or alternative to this measure, at least until more precise scientific advice is available.

¹ Watson, J. T., T. E. Essington, C. E. Lennert-Cody, and M. A. Hall. 2009. Trade-Offs in the Design of Fishery Closures: Management of Silky Shark Bycatch in the Eastern Pacific Ocean Tuna Fishery. *Conservation Biology* 23:626-635.

Hammerhead Shark Protection

We support the EU proposal to prohibit the retention, transshipment, landing, storing, selling, and offering for sale any part or whole carcass of hammerhead sharks of Family Sphyrnidae. We stress that, as hammerhead sharks are largely coastal (rather than oceanic) species, complementary, national measures are essential to reversing population declines.

The 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 while smooth hammerheads (*Sphyrna zygaena*) are classified as Globally Vulnerable. We agree that it is prudent to apply protections for the entire Family based on potential difficulties in differentiating between species at sea.

Shark Finning

Given that violations to the IATTC shark finning ban (estimated at 461 for 2010) have recently been discussed by the Compliance Committee, we take this opportunity to reiterate our strong support for the “fins naturally attached” method as the most reliable means for enforcing a shark finning ban. As detailed in a 2007 expert report from the European Elasmobranch Association (EEA)², 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 (allowing fins to be folded against the body) can address industry concerns about safety and efficient storage. Costa Rican fishermen are using this practice effectively for frozen as well as fresh sharks.

Because of the numerous practical advantages associated with the fins naturally attached method, the policy has been mandated for most Central American and U.S. fisheries, and is gaining acceptance in international arenas, as reflected in:

- The 2007 United Nations General Assembly Sustainable Fisheries Resolution
- The 2008 IUCN *Global Policy against Shark Finning*
- The 2010 Fish Stocks Agreement Review Conference on the Law of the Sea
- A 2010 European Parliament Resolution

A 2010 expert report from the IUCN Shark Specialist Group (SSG) and the EEA³ confirms and expands upon the benefits of “fins naturally attached” policies.

We urge the IATTC to take the lead within the world’s tuna Regional Fishery Management Organizations by being the first to formally adopt, *without exception*, this best practice for preventing shark finning.

² Hareide, N.R., J. Carlson, M. Clarke, S. Clarke, J. Ellis, S. Fordham, S. Fowler, M. Pinho, C. Raymakers, F. Serena, B. Seret, and S. Polti. 2007. *European Shark Fisheries: a preliminary investigation into fisheries, conversion factors, trade products, markets and management measures*. European Elasmobranch Association.

³ 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.

Other Compliance Issues

As noted in the IATTC Compliance Committee report, "retention of sharks may represent a violation of Resolution C-04-05, which requires the release, to the extent practicable, of all sharks taken as bycatch." We encourage Parties to investigate and address these issues.

Manta and Devil Rays

As you may be aware, manta and devil rays (*Manta* and *Mobula* spp.) share sharks' inherent susceptibility to overexploitation; their life history characteristics warrant a particularly cautious management approach. The estimate for total average annual bycatch of "manta rays" from 1993 to 2009 in IATTC purse seine fisheries is on par with that of oceanic whitetip sharks (3500+ animals). Manta and devil rays are increasingly in demand for their parts, particularly meat and gill rakers, and yet no population assessments or international safeguards exist. We echo IATTC scientists' calls for improved species identification and focused research on these particularly vulnerable species, as a matter of priority.


Summary

We urge the IATTC Parties to agree in the coming week measures to:

- prohibit retention, transshipment, and sale of oceanic whitetip and hammerhead sharks
- close the area north of 8° N to floating object based fisheries
- prohibit the removal of shark fins at sea
- enhance compliance with IATTC shark commitments, and
- expand research into the bycatch and status of Eastern Pacific "sharks", including rays.

Thank you for considering our views.

Sincerely,



Sonja Fordham
President
Shark Advocates International



Rebecca Regnery
Deputy Director, Wildlife
Humane Society International



Jenny Miller Garmendia
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Heike Zidowitz
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