



HUMANE SOCIETY
INTERNATIONAL



TRAFFIC
the wildlife trade monitoring network

Dr. Guillermo Compeán, Director
Inter-American Tropical Tuna Commission
8901 La Jolla Shores Drive
La Jolla, CA 92037-1508

April 30, 2015

Dear Dr. Compeán:

On behalf of our organizations, we are writing to request additions to the agenda of the upcoming meeting of the Inter-American Tropical Tuna Commission (IATTC) Scientific Advisory Committee (SAC), to address pressing conservation matters associated with take of Eastern Pacific Ocean (EPO) elasmobranchs (sharks and rays).

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 strongly supported recent listings under the Convention on Migratory Species (CMS) and the Convention on International Trade in Endangered Species (CITES) for several elasmobranch species that are caught in IATTC fisheries. As you will recall, CMS Appendix I listings require strict species protection by Parties while CMS Appendix II listings signal agreement for instituting regional management; CITES Appendix II listings obligate Parties to allow international trade only upon issuance of permits based on non-detriment findings (NDFs) that demonstrate that catches are legal and sustainable.

We are eager for scientific advice in order to ensure prompt fulfillment of these international commitments. In line with recent requests from the European Union (EU), we therefore ask that the following items be specifically addressed at the May SAC meeting:

- Updates/reissuance with respect to previous SAC advice on handling and retaining mobulid rays;
- Clear advice on recommended management action to protect hammerhead and silky sharks;
- Plans for developing Ecological Risk Assessments (ERAs) for data-poor EPO elasmobranch species to guide precautionary actions until robust stock assessment is possible; and
- The need for comprehensive national and regional NDFs for CITES-listed elasmobranchs.

MANTA AND MOBULA RAYS

We greatly appreciate the leadership from the IATTC staff with respect to the manta and devil rays (family Mobulidae) taken in IATTC purse seine fisheries (*Manta birostris*, *Mobula japonica*, *M. munkiana*, *M. thurstoni*, *M. tarapacana*). A particularly cautious approach is warranted for these large rays, both in terms of handling individuals and managing fishing mortality. Overexploitation of mantas, 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 inclusion of *M. birostris* and *M. alfredi* on CITES Appendix II and by the inclusion of the entire family on both Appendix I and II of CMS.

Shark Advocates International, a project of The Ocean Foundation, works to safeguard sharks and 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.

TRAFFIC is a joint program of WWF and IUCN working to ensure that trade in wild plants and animals is not a threat to the conservation of nature.

WWF's mission is to stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature.

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

The Wildlife Conservation Society, founded in 1895, has the clear mission to save wildlife and wild places across the globe.

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.

We remain strongly supportive of the 2014 IATTC staff recommendations aimed at safe, live release of incidentally caught mobulid rays, as well as prohibitions on retention of these species and other particularly lethal practices (gaffing, lifting by gill slits or spiracles, and punching holes in the wings). We are hopeful that reissuance of this sound advice, in light of recent CMS and CITES listings, will result in consistent management action at this year's annual IATTC meeting.

HAMMERHEAD SHARKS

CITES Appendix II requirements are also now in effect for scalloped hammerhead (*Sphyrna lewini*), great hammerhead (*Sphyrna mokarran*), and smooth hammerhead (*Sphyrna zygaena*), all of which are classified on the IUCN Red List as globally threatened. As stated by the EU, the IATTC can greatly aid in the implementation of these listings. We too urge the SAC to focus on providing clear advice for hammerhead shark status and mortality mitigation, through population assessment or, if necessary, ERAs.

SILKY SHARKS

We remain concerned over reported declines in silky sharks (*Carcharhinus falciformis*) in the EPO, and strongly support precautionary measures to rebuild this species, now also listed on CMS Appendix II. To that end, we are eager for the SAC to not only revisit the population assessment for this species, but also to issue updated advice for managers, including – as urged by the EU -- clear and direct recommendations for fishing limits and/or prohibitions.

Thank you for considering our views, which we request you circulate to all SAC members. We look forward to the final SAC agenda, and to the opportunity to have our perspectives represented at the May meeting through registered observers from our community.

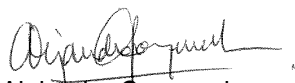
Sincerely,



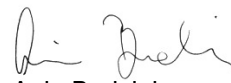
Sonja Fordham
President
Shark Advocates International



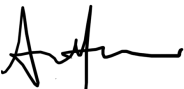
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