

October 22, 2015

Russell Smith
Deputy Assistant Secretary for International Fisheries
National Oceanic and Atmospheric Administration
Department of Commerce
1401 Constitution Avenue, NW
Washington, DC 20230



Dear Mr. Smith:

On behalf of our organizations, we are writing to encourage continued efforts by the United States to ensure that next month's annual meeting of the International Commission for the Conservation of Atlantic Tunas (ICCAT) results in more responsible fisheries management for Atlantic sharks.

Our organizations focus on the conservation of sharks (and closely related rays) due in large part to the low reproductive capacity that leaves most of these species exceptionally vulnerable to overexploitation. We are deeply concerned about the precarious status of pelagic sharks taken in ICCAT fisheries due to the lack of science-based fishing quotas, as well as poor compliance with existing limits and best practices.

Specifically, we respectfully urge you to continue US leadership for shark conservation at ICCAT by actively promoting:

- **The establishment of precautionary catch limits for shortfin mako and blue sharks;**
- **A prohibition on the retention of porbeagle sharks;**
- **A ban on removing shark fins at sea; and**
- **Convention amendments to allow for more comprehensive elasmobranch conservation.**

Our requests echo those made at the recent meeting of the US ICCAT Advisory Committee; their basis is outlined below.

Shortfin Mako Sharks

We remain deeply concerned about the lack of catch limits in place for the shortfin mako shark (*Isurus oxyrinchus*), one of the world's most valuable and vulnerable pelagic sharks. According to ICCAT's Standing Committee for Research and Statistics (SCRS):

- In ICCAT's three Ecological Risk Assessments (ERAs) since 2008, the shortfin mako has ranked 2nd or 3rd among 16 pelagic elasmobranch species with respect to vulnerability to ICCAT fisheries.
- Fishing mortality on shortfin mako sharks "should not be increased until more reliable stock assessment results are available for both the northern and southern stocks."
- "Precautionary management measures should be considered particularly for stocks where there is the greatest biological vulnerability and conservation concern, and for which there are very few data and/or great uncertainty in assessment results."

We recognize the pressing need for improved shortfin mako data with which to improve population assessments, and appreciate the proposed plan to do so over the next two years. In the meantime, however, biological vulnerability and status uncertainty in the face of high demand and fishing pressure continue to urgently warrant precautionary limits to at least cap mako landings. Given that ICCAT has taken stronger action for five shark species with lower ERA rankings, we see no valid excuse for continuing to leave mako sharks wholly unprotected from overfishing. We urge the US to once again propose mako limits at ICCAT.

Blue Sharks

We are disappointed that results from the latest stock assessment for blue sharks (*Prionace glauca*) remain highly uncertain, and that the SCRS was unable to reach consensus in terms of management advice for the North Atlantic population. A proposal for an ICCAT cap on blue shark landings, is however, clearly supported by the SCRS recommendation that South Atlantic catches not increase, the precautionary approach, and the benefits of consistent action across the Convention Area. We recognize that the EU is responsible for most blue shark catches, and request that the US actively support an EU proposal to cap landings, if one is offered.

Porbeagle Sharks

We are grateful that the US has been generally supportive of EU efforts to secure ICCAT protection for the porbeagles (*Lamna nasus*), another exceptionally valuable and vulnerable shark species. We are hopeful that the EU will once again propose an ICCAT prohibition on retention of this highly threatened species, and that chances for success will be enhanced by the ongoing implementation of obligations under the Convention on International Trade in Endangered Species (CITES) and associated difficulties in developing positive non-detriment findings. We urge the US to support the EU if they once again propose porbeagle protection.

An Enforceable Shark Finning Ban

We are very pleased that the US continues to collaborate with the EU and a growing number of countries in proposing the best practice for shark finning ban enforcement (requiring that all sharks be landed with fins still naturally attached) at Regional Fishery Management Organizations (RFMOs) around the world. A ban on at-sea shark fin removal by ICCAT would underscore the strong precedent for other RFMOs set last year at the North East Atlantic Fisheries Commission (NEAFC), and would help to prevent this wasteful practice throughout the Atlantic Ocean. We applaud your efforts to actively promote such a change, without exception.

Conclusion

We are hopeful that, with your leadership, ICCAT will next month take not only these important shark conservation steps, but will also agree changes to the Convention text that will facilitate more comprehensive management of Atlantic elasmobranch fishing over time.

Thank you for your consideration. We look forward to working with you in Malta toward our shared objectives.

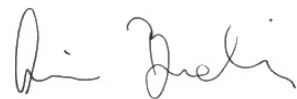
Sincerely,



Sonja Fordham
President
Shark Advocates International



Ali Hood
Director of Conservation
Shark Trust



Ania Budziak
Associate Director, Science and Policy
Project AWARE



Rebecca Regnery
Deputy Director, Wildlife
Humane Society International



Alejandra Goyenechea
Senior International Counsel
Defenders of Wildlife