

Attn: Mr. Virginijus Sinkevičius,
European Commissioner for Environment, Oceans and Fisheries

cc: Mr Marius Vaščega, Head of Cabinet Sinkevičius
cc: Mr Daniel Calleja Crespo, Director-General for Environment
cc: Mrs Charlina Vitcheva, Director-General for Maritime Affairs and Fisheries
cc: Mrs Veronika Veits, Director International Ocean Governance and Sustainable Fisheries
cc: Mr Anders Jessen, Head Regional Fisheries Management Organisations

via e-mail

September 4th, 2020

Subject: Bycatch of Protected Shortfin Mako Sharks – Urgent Need to Act

Dear Commissioner Sinkevičius,

It is clear that the impacts of COVID-19 have presented challenges to regional fisheries management organizations (RFMOs) in conducting meetings and addressing important conservation and management issues in 2020. In the case of the International Commission for the Conservation of Atlantic Tunas (ICCAT), it has led to the cancellation of its annual commission and science (SCRS) meetings.

We, the undersigned, do not believe current circumstances should prevent ICCAT from taking action to ensure the uninterrupted, sustainable management of tuna stocks and marine ecosystems under its purview. In particular shortfin mako sharks require immediate attention by ICCAT in 2020, as we were heartened to see was confirmed by the Commission Chairman, Mr. Raul Delgado, in his circular of 26 June 2020.

In 2019, the unanimous consensus from ICCAT's scientific committee was that fishing mortality was overwhelmingly above F_{MSY} (Maximum Sustainable Yield), with a combined 90% probability from all models showing shortfin mako as overfished, and experiencing overfishing in the North Atlantic. The Committee therefore recommended that the Commission should adopt a non-retention policy without exceptions.

We strongly urge the European Union as a Contracting Party to ICCAT to engage with the ICCAT Commission and other CPCs to **heed scientists' warnings about the depletion of the North Atlantic mako shark population and imminent risk to the South Atlantic mako shark population by increasing protection.**

Specifically, we urge the adoption of a new recommendation for shortfin mako sharks that:

- immediately (in 2020) prohibits all shortfin mako retentions
- and ensures that specific scientific advice for minimizing incidental mortality is developed and implemented in 2021

At the November 2019 commission meeting, Senegal and Canada requested the international adoption of scientific advice for makos and implementation of a Total Allowable Catch (TAC) of zero. This proposal was supported by Gambia, Gabon, Panama, Liberia, Guatemala, Angola, El Salvador, Egypt, Norway, Guinea Bissau, Uruguay, Japan, China and Taiwan, but no decision could be reached due to competing proposals from the USA and the European Union. Therefore, the decision was postponed to 2020 despite the urgency of the situation.

Why do we need an immediate retention ban for shortfin mako?

- Shortfin mako sharks are classified by the International Union for the Conservation of Nature (IUCN) as '**endangered**'.
- Mako sharks are fished for food, their fins and sport, with no international catch limits in place.
- In the North Atlantic, this has resulted in a conservation emergency – ICCAT's science committee notes it could take around 25 years for stocks to rebuild even if fishing mortality rates were cut to zero.
- In the South Atlantic, the situation may appear less dire, but will soon mirror the North Atlantic if catches are allowed to continue.
- Recognizing the need for action, the 18th Conference of the Parties to CITES (CITES CoP18, August 2019) added both species of mako shark to Appendix II of the Convention, meaning that all international trade in the species must now be regulated to be non-detrimental to the survival of the species in the wild.

Why is this extremely urgent now?

- ***Mako sharks in the North Atlantic are in a state of emergency, with South Atlantic mako sharks on a similar trajectory***
- Action is long overdue, as scientists first issued advice to address this problem in 2017 and ICCAT has *still* not acted.
- Mako sharks are slow growing, so rebuilding their populations will take decades.
- Scientific advice shows we can still change the fate of mako sharks, but further delays would risk complete stock collapse.
- Continued take from the High Seas and international trade without scientific justification would be in contravention of CITES obligations. Given that ICCAT's own science committee has recommended putting in place a no-retention measure since 2017 it seems unlikely any such scientific justification would be forthcoming.
- 16 delegations are already supportive of this ask; it is imperative for ICCAT to now take action.

Additional measures requiring ICCATs decisions this year

In addition, we urge the European Union to ensure that short-term measures to suspend certain observer coverage requirements are reinstated as soon as practical. Further, we believe current circumstances reinforce the need for accelerating the development and implementation of electronic monitoring tools and strategies to strengthen critical oversight in tuna fisheries. Specifically, **the Commission should ensure that the SCRS prioritizes the development in 2021 of standards for electronic monitoring**, as well as a workplan and timeline for implementation of a comprehensive electronic monitoring program.

While the impacts of Covid-19 have prevented the 22nd session of ICCAT from taking place, overfishing for tuna and sharks continues in the area covered by the Convention. There remains, therefore, an urgent need for delegations to meet together and carry out the objectives of the Convention. We are calling for a rescheduled Commission meeting to take place in early 2021.

As organizations globally engaged in marine conservation, we urge you to ensure that the European Union fully supports addressing these issues in 2020 and that the European Union's positions will be unambiguous in that regard. We count on your support, thank you.

The signatories,

Sharkproject International

Alex Smolinsky, President

Slow Food Deutschland

Dr. Nina Wolff, Executive Board

All for Blue

Katerina Topouzoglou, Founder

Aktionsgemeinschaft Artenschutz (AGA) e.V

Birgit Braun, Executive Board Member

Blue Marine Foundation

Jess Rattle, Head of Communication

Blue Shark Conservation

Katrien Vandeveld & Jan Wouters, Founders

Born Free Foundation

Dr. Mark Jones, Head of Policy

DEEPWAVE e.V.

Heye Groß, 1. Chairman

Deutsche Elasmobranchier-Gesellschaft (D.E.G.) e.V.

Dr. Simon Weigmann, Chair

Deutsche Stiftung Meeresschutz (DSM)

Ulrich Karlowski, Board Member

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Dr. Katharina Fietz, Project Manager Marine Conservation

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Tom Gammage, Ocean Campaigner

Fair Fish International Association

Billo Heinzpeter Studer, President

Forum Umwelt und Entwicklung

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Verena Platt-Till, Scientific Director

The Global Shark Conservation Initiative

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