

Affoltern am Albis, 16.05.22

Position Statement for the 26th Session of the Indian Ocean Tuna Commission

SHARKPROJECT International is a marine conservation NGO focusing on healthy marine ecosystems and healthy shark populations, a 'conditio sine qua non' for healthy oceans that can support seafood supplies for this and future generations and are able to contribute to combatting climate change.

Therefore, SHARKPROJECT has been calling for a global [transition to an ecosystem based fishery management](#), for ALL stocks, whether a target species or a bycatch applying best available science and in the absence of sufficient data following a precautionary approach to immediately stop overfishing and rebuild overfished stocks with a high probability of success.

Sharks and rays are in a crisis – globally and also in the Indian Ocean, an ocean famous for its unique biodiversity and once home to some of the world's most abundant fishing grounds supporting the livelihoods of millions of people in coastal areas.

[In 2021 N. Pacoureau](#) et al. warned that more than half of all pelagic shark and ray species are now globally endangered or even critically endangered by extinction and that the abundance of pelagic sharks and rays has decreased by more than 71% over the last 50 years due to the impact of industrial fishing. Due to their biology and high spatial overlap with high seas fishing operations these pelagic species are most vulnerable to overfishing, but have nevertheless been targeted over many decades by both, industrial and artisanal fisheries - without adequate management, poor monitoring, little if any reporting of mortality, and virtually without catch limits in place.

As a result many stocks are today at the brink of collapse like the Northern Atlantic *Isurus oxyrinchus*, but even worse most pelagic sharks and rays have an unknown stock status due to continued non reporting or severe under reporting of catches and discards, and due to IUU activities including finning and non compliance with the few existing retention bans. At coverage rates of mostly less than 10% for independent monitoring such infringements are almost impossible to detect and further hinder stock assessments and meaningful stock projections.

No data means no certainty, and without certainty no management measures get implemented – this appears to be the vicious circle for these most vulnerable species, which are therefore neither adequately reported nor managed sustainably in most RFMOs, including the IOTC. Yet, once overfished many of these species will require more than 50 years for stock rebuilding even at a fishing mortality of zero, as projected by ICCAT's SCRS for Northern Atlantic *I. oxyrinchus*.

SHARKPROJECT is therefore very concerned to see that IOTC continues to ignore the dire state of sharks and rays in the Indian Ocean and the massive impacts IOTC's industrial fisheries for tuna and tuna like have on these vulnerable species, as do the many artisanal tuna and mixed species fisheries.

We specifically note:

- Compliance with mandatory reporting requirements continues to remain extremely low. This implicates a high uncertainty on the true dimensions of catches, the true status of the stocks in the IOTC, and the impact fisheries do have on these stocks and should therefore be rated as alarming. At a **reporting rate for catch data and mandatory statistical data** (Res. 15/02 and Res. 17/05) **around or even below 50%** no reliable assessment of fisheries impact on the stocks can be established and with length frequency data and catch effort data as low as 15% and 30% respectively, stock assessments and projections are jeopardised.

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- Noteworthy, to say that not all shark species have to be reported for all gear types and that Resolution 15/01 provides substantial exemptions from reporting obligations for small vessels.
- **Low compliance with the few existing conservation measures for sharks and rays** including the reporting of interactions with whale sharks (Resolution 13/05), reporting of blue shark catches (Resolution 18/02) and the few existing retention bans (thresher sharks 12/09, oceanic white tip sharks 13/06, mobulid rays 19/03) is still below 80% and even the few CMMs prohibiting the retention of certain species are not fully complied with.
 - **Low to very low observer coverage** of most industrial fleets and virtually no coverage / reporting of most of the artisanal fleets add further questions as to the reliability of the reported shark catches and the true mortality as almost none of the CPCs reported shark discards in 2020 despite Res. 15/01 Annex II 2.4 requiring shark discards to be reported for those species listed in this resolution.
 - **Transshipment of almost 2.000 tonnes of sharks** including CITES App. II listed mako sharks and CITES App II listed thresher sharks (in conflict with Resolution 12/09) and more of half of them not reported down to species level further adds to the high risk of under or non reporting, as well as non compliance with the few existing CMMs for sharks when observer coverage is generally low and has been even lower during the pandemic. (April 2022; A Summary of the IOTC Regional Observer Programme During 2021)

All these risks clearly should have triggered a precautionary approach and resulted in the implementation of management measures beyond calling for improved reporting, which apparently has not improved tangibly over the last years.

In this context SHARKPROJECT especially notes the following four topics in need of action taken:

1. In its IOTC–2021–SC24–R[E] report the Scientific Committee only recommends to “take a cautious approach to the management by implementing some management actions“ for *Sphyrna lewini* (globally critically endangered, endangered in IO) and *Carcharhinus falciformis* (globally vulnerable, near threatened in IO) for both of which **no stock status is known**, but it is well established that both are globally over-exploited as a result of the highly lucrative shark fin trade. Noting, that other tuna RFMOs have by now implemented conservation measures for these species with ICCAT having banned the retention of both of these species and WCPFC having a retention ban in place for silky sharks. Nevertheless, both species continue to be caught in the IO without any limits.

For *Isurus oxyrinchus* “management actions that reduce fishing mortality“ are recommended but without proposing any such measures or suggesting a precautionary mortality limit, although there is no reason to believe that the IO stock is not at risk to follow a similar trajectory as the Atlantic stocks, especially in **absence of a stock status**, which couldn't be established in 2020 due to the lack of data and the inconsistency of the limited data available. There has been a retention ban agreed for shortfin mako for the next two years in the North Atlantic and total mortality limited to 250 t for the future, but IOTC has so far not even considered introducing catch limits.

2. So far the Commission has not evaluated other oceanic shark and ray species although they are certainly also affected by tuna fisheries and artisanal fisheries in the Indian Ocean. Most of these species are hugely underreported, have to date no known stock status in the IO, and catch efforts are not even reported at species level or by gear type, **noting with concern that around 25.000 to 35.000 tonnes of sharks are reported on average without species determination**, thereby making the evaluation of abundance and vulnerability of many species to fishing operations practically impossible.
3. Although a stock assessment for *Prionace glauca* in 2021 concluded that the stock in the IO is with more than 99% probability currently neither overfished nor experiences overfishing, it should be noted that,

- the SC cautioned in its report (IOTC–2021–SC24–R[E]) that reported catches of blue shark and estimated catches differ by a factor of two and that catches may be even higher than estimated, as about 30.000 tonnes of sharks are on average not reported at species level and might also include blue sharks. Keeping this in mind SHARKPROJECT is concerned that the **established MSY of 36.000 tonnes per year may easily be exceeded** without any management measures in place.
- based on the stock projections from the stock assessment the SC warns that **“If the catches are increased by over 20%, the probability of maintaining spawning biomass above MSY reference levels (SB>SBMSY) over the next 10 years will be decreased”**
- the SC also notes that the Commission to date has not adopted harvest control rules or target reference points for any shark species.

Therefore, the SC recommends to closely monitor the stock **but does not provide any advise on management measures “ensuring long-term sustainability of the stock, such as mitigation measures to reduce the mortality of blue shark, improving selectivity of fishing gears, spatial/temporal closures or minimum conservation sizes”**, despite the provisions made in Resolution 18/02.

4. Finally Resolution 17/05, while aiming to strengthen the ban on shark finning by requesting the globally acknowledged best management measure to prevent finning, completely ignores the fact that especially industrial fisheries store, land, or tranship the majority of sharks frozen. Therefore, the existing ‘Fins Naturally Attached’ policy urgently needs to be extended to all shark catches, prohibiting the removal of fins at sea - without exemptions – regardless whether sharks are to be landed fresh or frozen.
Also the transshipment of sharks should be prohibited as transshipment complicates monitoring and surveillance of compliance with the resolution.

Therefore, we call to the Commission to act now and stop letting poor compliance with shark reporting requirements prevent the implementation of urgently needed management and conservation measures, including precautionary catch limits and retention bans for those stocks that are at highest risk of over-exploitation until a time when stocks are confirmed to be or having been rebuild to above SB_{MSY} .

We therefore highly appreciate the intervention made by the UK delegation today and urge other delegations to support the request made and to make sharks and rays a priority for next year’s Commission meeting.

We must no longer ignore the global crisis sharks are in today and it is therefore important that the Commission takes a much more proactive and precautionary approach to shark management for the future, rather than reiterating the old paradigm that we need more and better data, which eventually never will become available.

We will gladly work together with all parties and support drafting improved management measures for sharks and rays in the Indian Ocean based on best available science and a precautionary approach.

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