



# SHARK ALLIANCE summary position EU consultation document for a Community Plan of Action for sharks

## OVERVIEW

Whereas we remain concerned that the European Community Plan of Action (CPOA) for sharks is long overdue, we are encouraged by the sound conservation elements outlined in the Commission's consultation paper.

The Shark Alliance generally supports the Commission's objectives for a CPOA, which aim to ensure:

- ▶ A deeper understanding of sharks and their role in ecosystems and fisheries;
- ▶ Sustainable directed shark fisheries and properly regulated bycatch; and
- ▶ A coherent approach between internal and external Community policies for sharks.

We support most of the proposed actions, but find the following key elements lacking:

- ▶ Clarification that the precautionary approach can be applied through catch limits, while scientific advice is being developed, particularly for threatened species;
- ▶ An option for a fins-attached strategy for preventing shark finning; and
- ▶ Consideration of the role of wildlife treaties (CITES, CMS, etc) in shark conservation.

## KEY POINTS ON PROPOSED FIELDS OF ACTION

### FIELD OF ACTION #1:

#### Facilitate improved species-specific catch data

The Shark Alliance supports Commission proposals to:

- ▶ invest in species-specific data collection and verification at landings sites, *but also at sea*, and
- ▶ promote Regional Plans of Action and close attention to related commitments made through CITES.

### FIELD OF ACTION #2:

#### Facilitate collection of species-specific biological and trade data

The Shark Alliance supports Commission proposals to:

- ▶ increase observer coverage for vessels taking significant numbers of sharks, and
- ▶ require reporting of shark landings and trade separately by commodity and species.

#### In addition, we propose:

- ▶ a broader scope of shark products recorded in trade (include teeth, hides and cartilage, in addition to meat, fins and oil).

### FIELD OF ACTION #3:

#### Assess threats to populations, identify and protect critical habitats

The Shark Alliance supports Commission proposals to:

- ▶ ensure regular assessment of the status of shark populations,
- ▶ determine levels of fishing mortality on sharks, and
- ▶ study and protect key habitats where sharks congregate and can be vulnerable to fishing.

#### We also propose:

- ▶ the determination of sustainable levels of fishing and/or precautionary limits in data-poor situations.

### FIELD OF ACTION #4:

#### Research threats to shark populations associated with biology and bycatch

The Shark Alliance supports Commission proposals to:

- ▶ improve the understanding of shark life history traits and ecological impacts of shark depletion, and
- ▶ investigate means to reduce bycatch and discard mortality for unwanted and non-commercial species.

### **In addition, we propose that the Commission:**

- ▶ aim to *minimise* (not just reduce) bycatch,
- ▶ for *protected, threatened* and *unmanaged* species, as well.

### **FIELD OF ACTION #5:**

#### **Improve stakeholder consultation and awareness**

The Shark Alliance supports Commission proposals to:

- ▶ educate fishermen and the public regarding shark population status and conservation rules,
- ▶ offer greater public access to shark fisheries and permit information.

### **In addition, we propose that the Commission:**

- ▶ publicize techniques for safe handling and release of sharks (to avoid harm to fishermen and sharks).

### **FIELD OF ACTION #6:**

#### **Adjust fishing effort to ensure sustainability**

The Shark Alliance supports Commission proposals to:

- ▶ reduce fishing effort, in line with FAO agreements and EU fishing capacity reduction goals, and
- ▶ restrict fishing in key habitats of endangered sharks.

### **FIELD OF ACTION #7:**

#### **Adjust catches to ensure sustainability**

The Shark Alliance supports Commission proposals to:

- ▶ limit shark catch in line with scientific advice,
- ▶ improve gear selectivity and reduce (*minimize*) discards of sharks,
- ▶ establish time/area closures in areas where sharks aggregate, and
- ▶ make exceptions to discard ban for sharks with a chance to survive.

### **We further propose:**

- ▶ precautionary restrictions in the meantime,
- ▶ options for size limits (minimum, maximum and slot) and gear restrictions, and
- ▶ further exceptions to the discard ban for species considered by IUCN as *Threatened*.

### **FIELD OF ACTION #8:**

#### **Minimize waste and discards of sharks by improving finning bans**

The Shark Alliance asserts that the best way to strengthen finning bans is to:

- ▶ eliminate the derogation that allows shark fins to be removed on board vessels.

### **Short of that, the following Commission proposals would significantly strengthen the regulation:**

- ▶ require the landing of fins and carcasses at the same time, in the same port, and
- ▶ reduce the fin to carcass ratio from 5% *whole* weight to 5% of *dressed* weight.

### **The Shark Alliance strongly opposes Commission proposals to:**

- ▶ allow Member State exceptions for higher ratios.

### **Field of Action #9:**

#### **Provide special attention to threatened shark populations**

The Shark Alliance supports Commission proposals to:

- ▶ afford special protections for species deemed by IUCN as *Endangered* or *Critically Endangered*, and
- ▶ establish EU and RFMO bycatch reduction programs and time/area closures for these species.

### **We further propose that:**

- ▶ protections from fishing (prohibitions on targeting, retention and landing) be included as tools, and
- ▶ international initiatives include protective action through wildlife treaties (such as CITES and CMS).

## **IMPACTS OF ACTIONS**

### **Environmental effects:**

- ▶ Most sharks serve as top predators and are thereby key to maintaining balance in marine ecosystems.
- ▶ Scientists warn that the consequences of removing top predators, although difficult to predict, will likely be negative, cascading and often counter-intuitive.
- ▶ Precautionary, science-based management can prevent shark population depletion and thereby ensure proper functioning of ocean ecosystems.

### **Social and economic effects:**

- ▶ Restoring shark fisheries can take decades or even centuries due to target species' slow growth.
- ▶ Long-term benefits of conserving sharks generally outweigh short-term costs.
- ▶ Social and economic impacts of not managing sharks are likely to be significant for fishermen targeting sharks (through substantially reduced available or allowable catches) as well as those taking sharks as bycatch (if strict rules on fishing areas or bycatch are necessitated for threatened species).
- ▶ Negative economic impacts can result from associated declines in the health or abundance of other populations (as a consequence of removing top predators).

*A comprehensive European Community Plan of Action for Sharks, is key to a healthier future for Europe's shark populations as well as the marine ecosystems and fishing opportunities they support*