

SHARK ALLIANCE POSITION

EUROPEAN COMMUNITY PLAN OF ACTION FOR THE CONSERVATION OF SHARKS

The Shark Alliance welcomes the final European Community Shark* Plan, pursuant to the *International Plan of Action (IPOA) for Sharks*. Whereas some of the Plan's provisions (particularly those on finning) do not fully meet our expectations, overall, we find the document to be comprehensive and sound. If promptly and properly implemented, the Plan has potential to vastly improve EU shark policy and turn the tide for some of Europe's most vulnerable and neglected animals.

Specifically, the Shark Alliance generally supports the Commission's objectives for its Shark Plan, which aim to ensure:

- a deeper understanding of sharks & their role in ecosystems & fisheries,
- sustainable directed shark fisheries & properly regulated bycatch, and
- a coherent approach between internal & external Community policies for sharks.

1) We support the Commission's intention to *improve species-specific data on shark catches & trade* through:

- enhanced investment in collection of species-specific data for shark landings, processing & marketing,
- increased at-sea observer coverage on vessels taking sharks,
- monitoring & assessment of recreational shark fishing mortality,
- recording of landings & trade of sharks separately by commodity and to the species level where possible, and
- promotion of Regional Plans of Action and reporting of related progress at the January 2010 meeting of CITES.

2) We support efforts to *assess & mitigate threats to shark populations* through:

- species-specific evaluation & monitoring of shark population status,
- fishing strategies based on principles for sustainability & long-term use of shark populations, and
- development of shark fisheries science expertise at the national level.

3) We support *improving stakeholder consultation & awareness* by:

- educating fishermen & the public about shark conservation programmes & restrictions,
- consulting the Regional Advisory Councils regarding best practices for management & bycatch reduction, and
- encouraging Member States to allow greater public access to shark fisheries information.

4) We support efforts to *ensure sustainable shark fisheries & protection for threatened shark species* by:

- matching fishing effort to available resources,
- setting limits on shark catch according to scientific advice,
- improving gear selectivity for reduced bycatch of sharks,
- developing bycatch reduction programmes for *Endangered & Critically Endangered* shark species,
- establishing time/area closures to protect shark pupping & nursery areas,
- further restricting or prohibiting fishing in critical habitats of *Endangered* sharks,
- promoting compatible shark fishing restrictions at Regional Fisheries Management Organizations,
- banning discard of dead sharks, provided sale of species for which fisheries are closed is strictly forbidden,
- granting exceptions to the discard ban for live, "unwanted" sharks, and
- using wildlife agreements, particularly CITES & CMS, to control shark fishing & trade.

5) We support tightening restrictions under the *finning ban* derogation (that allows at-sea fin removal) by:

- requiring the landing of shark fins & carcasses at the same time, in the same port,
- reducing the fin to carcass ratio from 5% *whole* weight to 5% of *dressed* weight, and
- making the process of justifying the need to remove fins at sea more rigorous.

The Shark Alliance remains concerned about the Commission's proposal to allow EU Member States in certain cases to adopt ratios higher than 5% dressed weight, as such action – particularly without appropriate control and enforcement – could perpetuate loopholes in the finning ban. The most reliable means to prohibit finning is to require that sharks be landed with **fins attached** (which the Commission confirms is the general rule). We continue to call for the complete elimination of the finning ban derogation & special fishing permits that allow fins to be removed on board vessels at sea.

* Consistent with the IPOA definition, the term "shark" refers to all cartilaginous fishes: sharks, skates, rays & chimaeras.