

**Shark Alliance * Pew Environment Group * Conservation International * Shark Trust
Save Our Seas Foundation * Humane Society International * Shark Research Institute
The Ocean Foundation * D'Arros Research Centre * SharkLab * CRAM Foundation
European Elasmobranch Association * Project Aware Foundation * MedSharks
International Fund for Animal Welfare * Sharkman's World Organization**

February 28, 2010

Mr. Alejandro Anganuzzi
Executive Secretary
Indian Ocean Tuna Commission
P.O. 1011, Victoria
Seychelles

Dear Mr. Anganuzzi:

We are writing to encourage conservation action for sharks at this week's annual meeting of the Indian Ocean Tuna Commission (IOTC). We respectfully request that you share this letter with the IOTC Parties.

Protection of Hammerhead and Thresher Sharks

We strongly support a prohibition on retaining, transshipping, landing, storing, selling or offering for sale any part or whole carcass of hammerhead and thresher sharks (any and all species in the families Sphyrnidae and Alopiidae), as proposed by the European Union. We also support the EU's efforts to mandate careful release of these species, require reporting of releases, minimize fishing in hammerhead and thresher shark aggregation areas, and facilitate research into the species' nursery grounds. We suggest, however, that reporting requirements be equivalent for commercial and recreational fishermen.

We agree with the EU that several species within these families have been found to be exceptionally vulnerable to overexploitation from pelagic fisheries and/or particularly depleted. For example, the scalloped hammerhead (*Sphyrna lewini*) and great hammerhead (*Sphyrna mokarran*) are the only two pelagic or semi-pelagic sharks classified by the International Union for Conservation of Nature (IUCN) as globally *Endangered*. The bigeye thresher (*Alopias superciliosus*) was determined through Ecological Risk Assessment analyses to have the highest inherent risk of overfishing of all Atlantic, pelagic sharks; the IUCN lists all species of thresher sharks as globally *Vulnerable*. Because of difficulties differentiating among species within the families Sphyrnidae and Alopiidae, we agree that protecting all species of hammerhead and thresher sharks is prudent and warranted.

There is ample reason and urgent need for the IOTC to afford hammerhead and thresher sharks particular attention and protection; we urge all Parties to support the measures addressed above.

Additional Shark Data Collection Measures

We also support the EU's call to all Contracting Parties, Co-operating non-Contracting Parties, Entities or fishing Entities to submit data on sharks, as required by IOTC data reporting procedures.

In addition, we urge Parties to adopt the following recommendations from the most recent meeting of the IOTC Working Party on Ecosystems and Bycatch (WPEB) that call for:

- Assessment of regional shark populations using available information on various fishery indicators;
- Particular attention and immediate assessment for blue, oceanic whitetip and silky shark;
- Compilation of information of potential value for whale shark population assessment; and
- Priority pelagic shark status review at the next meeting of the WPEB.

We also support the WPEB call to amend IOTC resolution 08/04 (concerning longline catch recording) to add white, crocodile, thresher, tiger, requiem, and hammerhead sharks as well as pelagic stingray to the minimum reporting requirement list; and to replace 'mako shark' with 'mako sharks'. We do not, however, support the deletion of porbeagle shark from this list because the species' range extends into the southeast Indian Ocean; porbeagles are also found off Australia. Porbeagles are particularly vulnerable sharks; their poor conservation status, particularly in the North Atlantic, has earned global attention and makes evaluation of Southern hemisphere populations of particular interest. It is therefore imperative to provide for the reporting of porbeagle catches from IOTC fisheries even if such events are uncommon.

Shark Finning Rules

Our organisations are united in strong opposition to shark finning (cutting off a shark's fins and discarding the body at sea). This practice is associated with unsustainable levels of mortality and unacceptable levels of waste. We appreciate that the IOTC, like other Regional Fishery Management Organisations (RFMOs), has adopted a ban on finning. We are eager to help ensure that the ban is enforceable and effective.

To that end, we strongly urge Parties to heed the latest IOTC WPEB recommendation on this topic: "The 5% fin to body weight ratio measure be replaced with a resolution requiring sharks to be landed with fins naturally attached to the body." The WPEB also "noted that the suggestion that fins could be detached and then re-attached to the carcass in a plastic bag was ecologically unacceptable. Rather, fins might be partially sliced through and folded over, thus minimizing storage space while remaining attached."

We take this opportunity to again highlight the main conclusions of a 2007 European Elasmobranch Association workshop on shark finning regulation. The EEA report¹ authors, who include leading shark scientists and management experts, noted the following benefits of a "fins-naturally-attached" policy:

- Calculation, decisions and alterations of ratios are unnecessary;
- Enforcement burden is reduced;
- Information on species and quantities of sharks landed is vastly improved;
- "High-grading" (mixing bodies and fins from different animals) is impossible; and
- Precise fin cutting can increase the value of finished fin product.

Prohibiting shark fin removal at sea would also be in line with the United Nations General Assembly 2007 Sustainable Fisheries Resolution which specifically encouraged consideration of fins-naturally-attached policies and a 2008 IUCN World Conservation Congress Resolution that also called for such action.

Thank you for considering our views. We look forward to hearing about the outcomes of the meeting.

Sincerely,

Sonja Fordham
EU Policy Director
Shark Alliance

Sandrine Polti
Senior Associate, EU Shark Policy
Pew Environment Group

¹ European Shark Fisheries: a preliminary investigation into fisheries, conversion factors, trade products, markets and management measures. *Hareide, N.R., J. Carlson, M. Clarke, S. Clarke, J. Ellis, S. Fordham, S. Fowler, M. Pinho, C. Raymakers, F. Serena, B. Seret, and S. Polti. 2007.* European Elasmobranch Association.

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