To improve fisheries management of sharks, we propose that the EU Commission consistently promote the following principles both within EU waters and at the level of tuna RFMOs:

1. **Commit to and promote the development of robust Management Procedures for all commercially fished sharks,** with a particular focus on blue sharks and shortfin mako sharks, including
    a. as a first step, the introduction of total mortality limits and the allocation of catch quota, adopting at least precautionary TACs based on the catches from the last 3 years if no recent stock assessments are available to scientifically justify a TAC.
    b. start Management Strategy Evaluation (MSE) to develop robust Management Procedures, including HCRs with the associated target, limit and threshold reference points, to be adopted by all RFMOs within the next 5 years, prioritising blue sharks and shortfin mako sharks, followed by all other commercially fished sharks that are caught in industrial and/or artisanal fisheries.

2. **Support effective bycatch mitigation measures for all non-target species** to significantly reduce both, at-vessel and post-release mortality of ETP species, with priority given to '*critically endangered*' and '*endangered*' species and to those species listed in the annexes of international conventions, such as CMS and CITES. This applies inter alia to oceanic whitetip sharks, hammerhead sharks, mako sharks, thresher sharks, porbeagle sharks, and silky sharks, all of which are highly vulnerable to overfishing.
    a. Reduce at-vessel mortality and increase post-release survival of critically endangered and endangered shark species in surface longline fisheries, by supporting gear modifications that have proven to reduce mortality of sharks in some or all RFMOs and demonstrated to be most effective when combined with retention bans.
    b. Reduce bycatch mortality of juvenile sharks, such as silky sharks and oceanic whitetip sharks, in purse seine fisheries by introducing rapid-release devices for sharks (e.g. release ramps or double conveyor belts) and intensify research on methods that help to avoid setting on sharks in the first place.
    c. Promote mitigation measures for gillnet fisheries and support these efforts across all RFMOs by building capacity for the testing of existing mitigation measures (e.g. green LED lights) and the development of new measures, while supporting a gradual phase out of gillnet fisheries through a transition to more sustainable gear types.

Dr. Iris Ziegler, Head of Fisheries Policies and Ocean Advocacy
Deutsche Stiftung Meeresschutz/German Foundation for Marine Conservation
www.stiftung-meeresschutz.org

3. **Strongly advocate for the adoption of the *Fins Naturally Attached* policy without exemptions** and consider implementing trade restrictions for all sharks / shark products from areas where FNA is not in place or other measures beyond fisheries policies in response to the continued rejection of the FNA measure by Japan.

4. **Follow scientific advice when adopting conservation and management measures** for sharks, rays, and other ETP species based on scientific research and advice (where available), taking specifically into account the important role of sharks and other ETP species for marine ecosystems.

5. **Apply a precautionary approach** in the absence of clear scientific advice or when data are insufficient or unavailable for a specific ocean or ocean area, by implementing precautionary measures and by following best practices already adopted by other RFMOs.

6. **Pursue a strategy focussed on the long-term sustainability of all fishing operations** by prioritising the rebuilding of overfished stocks of '*critically endangered*' species and '*endangered*' species – in the shortest possible time. The objective should be to maintain or rebuild all pelagic shark stocks at least in the '*green quadrant*' of the Kobe plot (i.e. ensure that the stock is neither overfished nor subject to overfishing). Implemented management measures to that end must demonstrate a high probability of success, of at least 60% or higher, given that pelagic sharks are far less productive than most other commercially fished species, therefore facing a much higher risk of overexploitation and lower chances for stock recovery once overfished.

7. **Create a level playing field by enforcing the implementation of and compliance with the respective CMMs and reporting requirements by all CPCs, for all fleets and gear types.** Long-term sustainability, healthy fish stocks and resilient ecosystems can only be achieved if ALL fisheries work together and fully comply with the adopted conservation and management measures. Specifically, exemptions for coastal or artisanal fleets, such as those existing at IOTC and ICCAT for retention bans and reporting requirements, should no longer be tolerated, or at the very least be limited to subsistence fishing activities of vessels under 12 meters only.

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Dr. Iris Ziegler, Head of Fisheries Policies and Ocean Advocacy
Deutsche Stiftung Meeresschutz/German Foundation for Marine Conservation
www.stiftung-meeresschutz.org

Annex – List of Acronyms

CITES – Convention on International Trade in Endangered Species of Wild Fauna and Flora

CMMs – Conservation and Management Measures

CMS – Convention on Migratory Species

CPCs – Contracting Parties and Cooperating Non-Contracting Parties

ETP species – Endangered, Threatened and Protected species

FNA – Fins Naturally Attached

HCRs – Harvest Control Rules

ICCAT – International Commission for the Conservation of Atlantic Tuna

IOTC – Indian Ocean Tuna Commission

MPs – Management Procedures – those were formerly called Harvest Strategies and a globally acknowledged to be to best approach to manage commercially fished species and by now applied or in development for most tuna stocks and tuna like species

MSE – Management Strategy Evaluation

RFMO – Regional Fisheries Management Organisation

TAC – Total Allowable Catch – this is generally used to define the total catch that can be retained but indeed should be read as the total allowable mortality as also non retained catch is subject to fishery related at vessel and post release mortality

Dr. Iris Ziegler, Head of Fisheries Policies and Ocean Advocacy
Deutsche Stiftung Meeresschutz/German Foundation for Marine Conservation
www.stiftung-meeresschutz.org