Position Statement Gallifrey Foundation

to Panel 4 of the 25th Special Meeting of the Commission

Vilamoura - Portugal

16-23 November 2026

Our Requests to the Commission for North Atlantic Mako:

1. Do not amend *Recommendation 21-09 on the conservation of the North Atlantic stock of shortfin mako caught in association with ICCAT fisheries)* and do not increase the total mortality limit beyond the current 250 t total mortality limit.
2. Maintain the existing retention prohibition established under Recommendation 21-09 for North Atlantic shortfin mako (*Isurus oxyrinchus*), and defer any decision regarding potential future retention allowances at least until the findings of the ICCAT-funded age validation study become available to validate the revised biological assumptions raised by the 2026 stock assessment.
3. Should Recommendation 21-09 be amended, align the rebuilding objective for North Atlantic shortfin mako (*Isurus oxyrinchus*) with that adopted for the South Atlantic stock under Recommendation 25-08—specifically, to rebuild the overfished stock with a probability of at least 70% by 2050 at the latest, or earlier if possible.
4. Identify and adopt effective bycatch mitigation measures to reduce shortfin mako (*Isurus oxyrinchus*) mortality across both the North and South Atlantic ocean, with the dual objective of preventing or minimizing incidental captures and maximizing post-release survival rates. Gallifrey urges the Commission to fulfill its existing obligations under Recommendations 21-09 and 25-08, which mandate that CPCs identify and propose such measures and that the Standing Committee on Research and Statistics (SCRS) evaluate and recommend additional measures for adoption. Despite these mandates, no such measures have been proposed or adopted since 2021, and over half of all discarded shortfin mako specimen continue to be discarded dead.

Our Requests to the Commission for South Atlantic Mako:

1. Enforce the compliance provisions of Recommendation 25-09 by excluding from future retention allowances any CPC that fails to fulfill mandatory reporting requirements, including the submission of Shark Check Sheets, data on shortfin mako (*Isurus oxyrinchus*) discards and live release estimates, or reports of any permissible landings to the ICCAT Secretariat within 30 days of the close of each calendar month.

2. Insist that CPCs remain strictly within their eligible retention allowances and repay any past excess landings in full pursuant to Recommendation 25-08, ensuring that domestic legislative prohibitions on dead discards are no longer accepted as a justification for exceeding authorized limits.
3. Mandate the SCRS to review the IOTC Scientific Committee and WPEB's recent compilation of gear-specific best handling and release guidelines for sharks, for whale sharks specifically and for mobulids together with its broader multispecies framework for vulnerable bycatch taxa.

Our Requests to the Commission for Blue Sharks:

1. Welcome ICCAT's commitment to the long-term sustainable management of Atlantic blue shark (*Prionace glauca*) stocks and commend the SCRS for its progress in developing Management Strategy Evaluation (MSE)-tested Management Procedures (MPs) for both stocks, as presented during the Panel 4 Intersessional Meeting. In order to advance this work, urge the Commission to adopt Proposal PA4-812 (Draft Resolution by ICCAT on operational management objectives for Atlantic blue shark.
2. Allocate sufficient financial resources and capacity support to advance the ongoing development work and avoid further delays to the adopted schedule, striving to finalize the Management Procedures (MPs) for adoption by the Commission by 2028.
3. Adopt a precautionary approach to the short and long-term sustainable management of blue shark (*Prionace glauca*) rather than seeking to maximize yield—and do address bycatch concerns regarding other vulnerable species, notably the conservation requirements for shortfin mako (*Isurus oxyrinchus*), separately rather than complicating Management Strategy Evaluation (MSE) development through a multispecies MSE framework."
4. Reduce the current Total Allowable Catches (TACs) for Atlantic blue shark (*Prionace glauca*) on an interim basis to levels that provide at least a 70% probability of maintaining both stocks in the green quadrant of the Kobe plot pending the adoption and implementation of Management Strategy Evaluation (MSE)-tested Management Procedures (MPs). Based on the 2023 stock assessment projections, setting the TAC at 25,000 t would secure these high probabilities for both stocks from 2029 onward.
5. Consider the application of alternative assessment methodologies more appropriate for data-limited stocks when conducting the 2027 stock assessment of Mediterranean blue shark (*Prionace glauca*), and task the SCRS with recommending precautionary management measures grounded in the assessment results—including in the event that the assessment cannot be successfully completed.

Our Requests to the Commission for Banning Finning:

1. Gallifrey Foundation strongly supports the adoption of Proposal PA4-807 (Draft Recommendation by ICCAT concerning the conservation of sharks caught in association with fisheries managed by ICCAT), jointly submitted by the United States and the European Union and already co-sponsored by numerous other CPCs.
2. Strengthen Proposal PA4-807 by incorporating an explicit definition of 'sharks', ideally encompassing all elasmobranchs or, at a minimum, adopting the definition set forth in IOTC Resolution 25/08: "all species belonging to the eight orders of Selachimorpha (Carcharhiniformes, Lamniformes, Orectolobiformes, Heterodontiformes, Squaliformes, Squatiniformes, Hexanchiformes, and Pristiophoriformes) and all species of the order Rhinopristiformes".

3. Refrain from adopting any alternative measures or exemptions, including those proposed in Proposal PA4-806 (Draft Recommendation by ICCAT concerning the conservation of sharks caught in association with fisheries managed by ICCAT),

Our Requests to the Commission for vulnerable Sharks caught as Bycatch:

1. Recommends that the Commission require all CPCs to initiate additional research across all gear types aimed at minimizing-and, where feasible, eliminating-incidental captures, while maximizing the post-capture survival of incidentally caught species through the adoption of mandatory, gear-specific best handling and live release guidelines modeled on those developed by the Indian Ocean Tuna Commission (IOTC).
2. Restrict all retention ban exemptions for developing coastal CPCs exclusively to subsistence fisheries, subject to verified compliance with all conditions stipulated in the applicable ICCAT Recommendations. Establish that any substantial increase in catches, or failure to provide proof of compliance no later than the 2027 SCRS Meeting, shall result in the expiration of such exemptions for the respective CPCs.
3. Remove the exemption for bonnethead shark (*Sphyrna tiburo*) from the retention prohibition in Recommendation 10-08. Because hammerhead species are difficult to differentiate in the water, encompassing all 'look-alike' species under the ban will improve compliance monitoring and facilitate in-water release by cutting the line close to the hook, thereby avoiding the high at-vessel and post-release mortality incurred when hammerheads are brought on board.
4. Update Recommendation 09-07 to extend the retention prohibition for bigeye thresher shark (*Alopias superciliosus*) to all species of the genus Alopias, thereby strengthening the existing conservation measure and eliminating ambiguity. Because distinguishing between the three Alopias species is difficult -and species-level identification necessitates bringing sharks on board, which substantially lowers their survival rates- covering the entire genus is essential.

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