ASSOCIATION OF NATIONAL ORGANISATIONS
OF FISHING ENTERPRISES IN THE EU

EUROPECHE DECLARATION
Priorities for the 25th extraordinary meeting of ICCAT

(16th – 23rd November 2026, Vilamoura, Portugal)

Panel 4 on swordfish, billfishes and sharks

Brussels, 28 September 2026

1. Fins Naturally Attached (FNA) Policy

Europêche recommends that the Commission pursue full compliance of the fins naturally attached policy with no exception.

The EU promoted full shark utilization through Regulation (EU) No 605/2013, the "Shark Finning Regulation". Similar proposals have repeatedly failed, including in 2025, due to opposition from Japan and China. Consequently, ICCAT remains the only tuna RFMO that has not strengthened its finning ban in more than 20 years.

From 2026 to 2028, each CPC may use only one alternative to the fins naturally attached policy for sharks landed frozen, provided it reports annually on effective enforcement. Any non-compliance will result in the immediate loss of the exemption to use that alternative.

However, the lack of progress and the exceptions granted to other CPCs undermine a level playing field for catches of the same stocks that are later sold in the same markets. Any use of alternatives should expire no later than 2028, after which "Fins Naturally Attached without exceptions" should automatically become the only acceptable measure.

1. Northern stock of Atlantic Shortfin Mako - SMA (Isurus oxyrinchus)

Europêche recommends:

- **Replacing the retention ban with a rebuilding-compatible TAC:**
    - allowing the retention of mako shark bycatch **up to the level of total removals compatible with rebuilding by 2070 according to projections**.
    - On the 2026 assessment, that level is up to ~1,500 t; setting the allowance at or near the recent level of ~1,046 t provides a probability of rebuilding success (~92–95%) well beyond the Commission's own criterion.

- In order to address the concern that total removals are estimated rather than observed: **proposing that shortfin mako retention is allowed to those ships with human observers and/or electronic monitoring (EM)** systems, when it arrives dead at the side of the ship.

The most recent assessment, that took more than two years to complete, highlighted that the assessment from 2017 was flawed. Scientists through the different meeting also expressed that the retention ban impaired the data collection, that further impairs the production of a quality assessment.

Nevertheless, it was concluded that a catch level of approximately 1,200 t, broadly equivalent to current catches, the estimated probability that the North Atlantic shortfin mako stock will be below FMSY, meaning overfishing is not occurring, is 97% in 2027. The probability that the stock will be above SSBMSY, meaning not overfished, is 49% in 2027, while the probability of being in the green zone by 2040 is 54%.[1]

Why the retention ban now would be an error in our view?

- Its grounded in an outdated assessment: The retention ban and the 250-t. allowance stem from the 2017 assessment. The 2026 assessment, based on three JABBA models and one age-structured SS3 model, reaches materially different conclusions. Keeping a measure whose scientific justification has lapsed is not precautionary, it is simply out of date. Management should follow the best available science, and the best available science now says the stock is rebuilding under current removals.
- It wastes a resource without any benefit for the stock: Shortfin mako is caught, unavoidably and predictably, as bycatch in surface longline fisheries targeting swordfish and blue shark. Under a retention ban, those fish are discarded**.** This is the worst possible outcome on every count. A fish that dies in the longline and is thrown back contributes to total mortality exactly as a fish that is landed. The ban does not save a single mako. However, perfectly marketable fish are destroyed, harming the viability of fleets, many of them small and family-based, that operate within the rules. In addition to that, a high-quality protein resource is wasted at a time when the sector faces historically tight margins.
- Retention is observable; mortality at release is not. A retained fish is weighed, sampled and recorded in logbooks and landing declarations. A discarded fish generates at best an observer's estimate of its fate, and often nothing at all. A retention ban shifts the entire accounting of removals from hard, auditable data to modelled estimates of dead discards and post-release mortality, precisely the components the SCRS considers most uncertain.

[1] *Liniers et al., 2026. 2026 North Atlantic Shortfin Mako Shark Stock Projections. SCRS/2026/178*