Ecology Action Centre statement on ICCAT P4_806A regarding the finning of sharks

The Ecology Action Centre, in concert with our partner organizations, appreciates is opportunity to express our serious concern and disappointment that — despite overwhelming, long-term support for the best practice of banning at-sea removal of shark fins — this late-breaking compromise is exceedingly complicated and risk-prone with a lengthy timeframe for potential benefits and no scientific basis. Adoption of this proposal could undermine long-fought progress to combat shark finning by many ICCAT CPCs as well as entities within the seafood sustainability sector.

Moreover, we are concerned that the proposal effectively endorses problematic practices for finning ban enforcement, potentially giving the impression that "alternatives" are equivalent to best practice. A similar measure for the IOTC resulted in nine CPCs, including three ICCAT CPC, taking the opportunity to trial an "alternative" measure. Normalizing these practices may open the door to their resurgence.

Expert advice

The SCRS in their 2005 evaluation of finning ban enforcement techniques characterized landing sharks with all fins attached as *"as the only guaranteed method."* ICCAT's 2016 Performance Review noted that most CPCs favored a fins-naturally-attached requirement because such a practice *"would lead to a qualitative improvement in information on both species and quantities landed; the monitoring and control burden would be reduced; and the prohibition of the shark finning would exclude the practice of high-grading."* The Panel advised *"that shark fins should be naturally attached on landings."*

We stress that there is no SCRS advice on the effectiveness of schemes that rely on wires, ropes, and/or tags to prevent shark finning.

A 2010 expert report[1] found that matching severed fins to carcasses using tags in large shark fisheries *"would place a huge burden upon industry and enforcement personnel"* while lost or discarded tags *"pose a hazard to marine life."*

Suggested improvements

The proposal should be improved by the addition of:

- A clear statement that a fins-naturally-attached requirement will enter into force in 2029 without need for further discussion;
- Criteria, scrutiny, and consequences associated with the currently inadequate process for the PWG to simply "review and discuss" CPCs' alternative measures reports; and
- An explanation of how authorities would determine the threshold temperature for frozen sharks and verify that detached fins were destined to be frozen.

[1] Fowler, S. and Séret, B. 2010. *Shark fins in Europe: Implications for reforming the EU finning ban.* European Elasmobranch Association and IUCN Shark Specialist Group.