

Position Statement of Deutsche Stiftung Meeresschutz (DSM) to Panel 4 of the 25th Special Meeting of the Commission in Vilamoura, Portugal, 16–23 Nov. 2026

Maintaining the Status Quo instead of meaningful Improvements towards Shark Conservation

Deutsche Stiftung Meeresschutz (DSM) welcomes the opportunity to share our views on the improvements needed and the progress made at ICCAT on the sustainable management of commercially shark stocks and the effective mortality reduction of vulnerable shark species that continue being caught by ICCAT fisheries as a bycatch.

Shortfin Mako Sharks (*Isurus oxyrinchus*)

- **We remain committed to a precautionary approach for the overfished NA stock of endangered shortfin mako**

  Therefore, we reiterate the best approach for rebuilding this stock as quickly as possible and avoid jeopardising this objective in the presence of the substantial uncertainties in the inputs to the 2026 stock assessment, the continuing high fishing related mortality and the poor compliance with discard reporting obligations for sharks at the ICCAT area.

1) **Maintain the current retention ban and do not revise the total mortality limit of 250 t in in Rec. 21-09** for SMA in the North Atlantic at least until the results of the ICCAT funded age validation study are available. either validating **or** revising the new biological hypothesis applied for the 2026 stock assessment.
3) **If amending Rec. 21-09** then align the rebuilding objective for shortfin mako in the North Atlantic with the objective adopted for South Atlantic shortfin mako in Rec. 25-08, i.e. to **rebuild the overfished stock with a probability of at least 70% at the latest by 2050 or earlier if possible**.
4) If updating Paragraph 25 of Rec 21-09 as proposed by PA4_814A/2026 then ensure that the proposed **review of measures in 2027, to reduce shark mortality in both parts of the Atlantic and the SCRS advice for such measures requested in 2028** will take place as described and will not once again be "forgotten". This is specifically important as no meeting of the Standing Working Group on Dialogue between Fisheries Scientists and Managers (SWGSM) is scheduled for 2027.
5) **Maintain the established way to estimate total mortality of shortfin mako every year by the Shark Species Group** combining reported dead discards and live release estimates submitted by the CPCs to calculate a total mortality for the year considering also post release mortality. This is important to ensure continuity of data and avoid additional word for the SCRS.

Blue shark (*Prionace glauca*) MSE for both Atlantic stocks

- **We are convinced that progress in the development of MSE tested MPs for these stocks is essential**

Progress being made this year is essential for the long-term sustainable management of the stocks and without the adoption of management objectives the risk of further delays increases. Therefore, adoption should be prioritised by the Commission.

1) **Shortfin mako mortality can be addressed without complicating or prolonging MSE development for blue sharks** either as part of the management objectives or as exceptional circumstances and should not be used as a blocking argument.
2) **Taking a precautionary approach on yields for blue sharks** instead of maximising exploitation provides a path forward to address concerns about shortfin mako mortality as well as the mortality of other bycatch in fisheries retaining blue sharks without complicating or delaying adoption of management objectives.

Fins Naturally Attached without Exceptions

- **We reiterate that Fins Naturally Attached without Exceptions for all fisheries is the only policy allowing offenses being detected, prosecuted and convicted and is therefore with "alternatives"**



The proposed approach for shark products landed frozen describing a phased transfer from the use of either one of two possible "alternatives" to fins naturally attached should:

- **not be considered as an acknowledgement of these measures as real alternatives**, as none of these allows for unambiguous confirmation of offenses and thereby does not allow for any prosecution or conviction of offenses.
- **not be considered as an insurance that this Commission will finally transition to fins naturally attached without exceptions by 2030** as the described conditions include multiple loopholes and are too difficult to confirm as a predefined sunset clause, most probably resulting in this Commission having to rediscuss this topic once again in 2029 with an uncertain outcome.

1) The **absence of a definition of "sharks" creates further ambiguity** for monitoring and enforcement of measures preventing effective enforcement. Therefore, both the WCPFC (CMM 2025-06) and the IOTC (Res 25/08) included a clear definition of "sharks" when recently adopting their measures to ban finning.
2) **Requiring all shark products landed fresh to require fins naturally attached without exceptions presents an appreciated progress** after 17 years of stalled progress at ICCAT in strengthening the outdated Rec 04-10.

Vulnerable shark species caught as a bycatch by ICCAT fisheries

We highlight that compliance with discard reporting requirements for sharks remains extremely poor. This prevents scientific assessments for most of ICCAT's threatened sharks caught in association with ICCAT fisheries and continues hindering mortality assessment even for shortfin mako, blue shark and porbeagle. As a result, shark mortality remains greatly underestimated and mostly unmitigated

1) We are **disappointed that so far no measures have been agreed to improve reporting of discards, tightening exemptions from retention bans and to improve bycatch mitigation measures** for sharks, neither to avoid, reduce or at least remediate bycatch and bycatch mortality.
2) We encourage the Commission to **task the SCRS to review the recent work undertaken by the IOTC Scientific Committee and Working Party on Ecosystems and Bycatch** in compiling gear-specific best handling and release guidance[1] for sharks, whale sharks and mobulids and a broader multispecies framework covering other vulnerable bycatch taxa.

The Commission remains obliviate of increasing international expectations to the conservation of sharks, the second most threatened class of vertebrates. While CITES, CMS and others progress in listing an increasing number of sharks and have recently entitled hammerhead sharks and thresher sharks, to the strictest protection (CMS App I listing in 2026) ICCAT has not reviewed outdated measures or attempted to improve protection of those threatened sharks for more than a decade.

Standing still instead of embracing progress in the management and conservation of the guardians of our oceans and the future of tuna fisheries.

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1 IOTC–WPEB22(AS) 2026. Report of the 22nd Session of the IOTC Working Party on Ecosystems and Bycatch Assessment Meeting. La Réunion and Online, 14 – 18; September 2026; APPENDIX XVVII BEST PRACTICE HANDLING AND RELEASE MASTER DOCUMENT; IOTC–2026–WPEB22(AS)–R[E]: 191pp