

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

Quo Vadis ICCAT?

Sharks and rays are globally under increasing pressure with an increasing number of species being threatened by extinction. Chondrichthyes are identified as the class of vertebrates of biggest conservation concern, second only to amphibians and the IUCN highlights a global shark and ray crisis, with 418 species threatened with extinction, more than one third of all known elasmobranch species.[1,2]

Tuna RFMOs have committed to the sustainable management of the species under their mandate and ICCAT agreed in 2019 to amend the International Convention for the Conservation of Atlantic Tunas, providing ICCAT with the mandate to manage oceanic, pelagic, and highly migratory species of sharks and rays found in the Atlantic Ocean. Although this "Palma Protocol"[3] has still not been ratified by a majority of the Contracting Parties the Commission has demonstrated leadership in tuna RFMOs and demonstrated that it can manage sharks in its area of competence by having adopted a number of conservation and management measures for sharks in the last 20 years, including inter alia allocated total mortality limits for commercially targeted sharks, i.e. blue sharks and shortfin mako sharks and having committed in 2023 to develop and adopt MSE tested Management Procedures for blue sharks. The Commission has also adopted retention bans for several threatened shark and ray species and most recently also for the CMS App I listed great white sharks and basking sharks, demonstrating its commitment to a precautionary approach and the conservation of species of greatest biological vulnerability and conservation concern for which there are very few data available.

However, it remains critically important to continue this journey making further progress towards a holistically sustainably management of all sharks and rays and at the same time resolve the remaining deficiencies in many management areas, such as species specific reporting, discard reporting, insufficient bycatch avoidance, bycatch reduction measures and bycatch mortality remediation as well as ICCAT's archaic finning prohibition, based on the completely inadequate and not enforceable fin-to-carcass ratio regulation.

Furthermore, we are deeply concerned seeing ICCAT now stepping back from its previously demonstrated science driven approach paired with a precautionary approach in the absence of sufficient or sufficiently strong data or in the presence of major uncertainties.

Especially, the outcome of the most recent stock assessment of North Atlantic shortfin mako sharks and the subsequent discussions following this stock assessment are deeply worrying as taking the wrong direction away from a precautionary science driven approach and into the direction of maximising exploitation at risk, as reflected in PA4-814 - Draft Recommendation by ICCAT amending Recommendation 21-09 on the conservation of the North Atlantic stock of shortfin mako caught in association with ICCAT fisheries. It took this Commission five years to finally follow the scientific advice from 2017 and adopt a retention ban, reverting this now based on a new assessment utilising unvalidated biological data would not only be premature but also fail taking a precautionary approach when the ability of this stock to recover at all is at stake.

Unfortunately, no progress was made by the SCRS in 2026 to propose measures to reduce mortality of sharks when caught as a bycatch and to strengthen the conservation of threatened sharks, lagging far behind the progress made at CITES, CMS and other RFMOs, instead of demonstrating leadership in the sustainable management and conservation of those species through ICCAT.

1 IUCN 2026. The IUCN Red List of Threatened Species. Version 2026-1. https://www.iucnredlist.org. ISSN 2307-8235. assessed at 15 August 2026

2 Dulvy, N. K., Aitchison, R. M., Arnold, A. E., et al. (2026). Bending back the curve of shark and ray biodiversity loss. *Nature Reviews Biodiversity, 2*, 92–115. https://doi.org/10.1038/s44358-025-00120-2

3 Palma Protocol https://faolex.fao.org/treaty/docs/tre000262E.pdf



We welcome the opportunity to share our concerns and insights with the Commission and all delegations in and look forward to constructive discussions and collaborative negotiations in Vilamoura, guided by the spirit of strengthening existing measures, progressing the management and conservation of tuna, tuna like species and sharks, and refraining from weakening or even reverting progress made by this Commission over the past years.

Our Position and Requests to the 25th Special Meeting of the Commission

Shortfin Mako Sharks (*Isurus oxyrinchus*)

Shortfin mako sharks are targeted by several fleets due to the high commercial value of their fins and their meat and are also a highly priced game fish in recreational fisheries.

North Atlantic

In 2021 ICCAT Rec. 21-09 banned the retention of shortfin mako in the North Atlantic based on the outcome of the 2019 stock assessment which had concluded the stock to be critically overfished and overfishing to continue, projecting that even at a fishing related mortality of zero the stock will continue to decline at least until 2035 and that the earliest possible time to rebuild this stock with a probability of at least 60% will be 2070.

Therefore, Rec. 21-09 agreed to rebuild shortfin mako by 2070 with a probability of at least 60-70% and established a total fishing mortality limit (TAC) of 250 t and a retention ban until a time when total mortality drops below 250 t. Despite the retention ban the estimated annual total mortality however continued exceeding 1,000 t since 2022 and was still about 780 t in 2025, with 628 t of the total catch still discarded dead and only 506 t released alive (at an estimated post release mortality of 29.4%.)[4]

Our Requests to the Commission for North Atlantic Mako:

1) **Do not adopt proposal "PA4-814** - Draft Recommendation by ICCAT amending Recommendation 21-09 on the conservation of the North Atlantic stock of shortfin mako caught in association with ICCAT fisheries."
2) **Maintain the current retention ban** in Rec. 21-09 for SMA in the North Atlantic and postpone the decision on any future retention allowance at least until the results of the ICCAT funded age validation study are available, validating the new biological assumptions used in 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) **Identify bycatch mitigation measures to reduce SMA mortality in both parts of the Atlantic** to avoid or at least reduce their catch in the first place and to increase the percentage of live releases. We urge the Commission to finally comply with the requirements laid out in Rec. 21-09 and Rec. 25-08 that CPCs shall identify and propose such measures and the SC shall evaluate and recommend additional measures for adoption by the Commission. No such measures have been proposed or adopted since 2021 and more than half of the discarded amount of shortfin mako is still discarded dead.

After the failed stock assessment attempt in 2025, the outcome in 2026 is based on the combined model for "Scenario 1" concluding the stock to be with a probability of 61.6% overfished but not subject to overfishing (probability of overfishing 19.6%)[5] "Scenario 1" is based on new, faster growth data resulting in the assumption of a substantially earlier age of sexual maturity, maintains a medium longevity of 42 years and assumes a faster reproductive cycle of 2.5 instead of 3 years, resulting altogether in a higher productivity of the stock by the factor 2-3.[6]

4 REPORT OF THE STANDING COMMITTEE ON RESEARCH AND STATISTICS (SCRS) (Hybrid/ Madrid (Spain) – 21 - 25 September 2026) September 2026; 19.31 SCRS shall calculate the retention level of North Atlantic shortfin mako Rec. 21-09 para 5c *(doc. SHK_17)* https://www.iccat.int/Documents/Meetings/Docs/2026/reports/2026_SCRS_ENG.pdf

5 REPORT OF THE STANDING COMMITTEE ON RESEARCH AND STATISTICS (SCRS) (Hybrid/ Madrid (Spain) – 21 - 25 September 2026) September 2026; Table 1a. North Atlantic shortfin mako shark summary table.; https://www.iccat.int/Documents/Meetings/Docs/2026/reports/2026_SCRS_ENG.pdf

6 C. Fernández, et al; PRELIMINARY 2026 STOCK SYNTHESIS (SS3) MODEL RUNS FOR NORTH ATLANTIC SHORTFIN MAKO SHARK (1950-2024) UNDER THREE ALTERNATIVE BIOLOGICAL SCENARIOS SCRS/2026/143; 2026



In their report the stock assessment group stated a number of relevant uncertainties and emphasised that the use of only one life-history scenario for the projections from the stock assessment should not be interpreted as acceptance of this life-history hypothesis and also that the results in the Kobe II Strategy Matrix should be interpreted with caution in view of substantial remaining uncertainties. Furthermore, it noted that all the observed data are from juveniles, yet stock status is expressed in terms of the mature component of the population. Therefore, the scientists recommended[7] prioritizing validating growth curves and other biological inputs by studies with adequate sample sizes and appropriate methods, including validation with an adequate range of ages for growth studies prior to any new stock assessment. Furthermore, alternative methods and metrics should be considered for shark stocks (e.g. spawning potential ratio) as MSY based reference points are highly dependent on population age structure, which is not well understood for some shark species.

However, The SCRS report[8] fails to reflect these substantial concerns and uncertainties the stock assessment scientists had raised and captured in the assessment report.[9] Instead the executive summary expects managers to take a deep dive into the technical details of the assessment report and to evaluate the associated risks themselves, when choosing potential rebuilding scenarios from the provided stock projections based on a single scenario, that heavily relies on a substantially higher stock productivity than previously assumed, while results from the validation study are not yet available.

South Atlantic

The 2025 stock assessment resulted in a combined probability of 66.9% that the stock is overfished and a 66.5% probability that the stock is experiencing overfishing even at the higher biological productivity assumed for this stock in the assessment. Therefore, Rec 25-08 further reduced the annual total mortality limit (TAC) for this stock to 1,000 t and strengthened the objective for the rebuilding of the overfished stock requiring it to be in the green quadrant of the Kobe matrix with a probability of at least 70% by no later than 2050. This results in a reduction of the allowance of shortfin mako for eligible CPCs from 637 t in 2026 to 572 t for 2027, limited to the retention of animals that are already dead when hauled on board.[10]

Our Requests to the Commission for South Atlantik Mako:

1) The Commission should **enforce the provisions of Rec 25-09 excluding all CPCs from future retention hat fail to comply** with the mandatory reporting requirements of the Shark Check Sheets, shortfin mako discards, including live release estimates or fail to report any permissible landings within 30 days of each calendar month to the ICCAT Secretariat.
2) The Commission should also insist **that CPCs do not exceed their (eligible) retention allowances and repay any past excess landings** in full as directed by Rec 25-08 and can no longer blame the prohibition of dead discards by domestic legislation as a justification for exceeding their allowance.
3) 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[11] for sharks, whale sharks and mobulids and a broader multispecies framework covering other vulnerable bycatch taxa.

7 2026 SMA ATL-N STOCK ASSESSMENT MEETING – HYBRID, LISBON, 2026; Report of the 2026 ICCAT North Atlantic Shortfin Mako Shark Stock Assessment Meeting (including Blue Shark MSE) *(Hybrid, Lisbon, Portugal, 8–12 June 2026; p 12 Recommendations to the SCRS*

8 REPORT OF THE STANDING COMMITTEE ON RESEARCH AND STATISTICS (SCRS) (Hybrid/ Madrid (Spain) – 21 - 25 September 2026) September 2026; 12.15 SMA-Shortfin mako (Isurus oxyrinchus); Outlook and Management Recommendations; https://www.iccat.int/Documents/Meetings/Docs/2026/reports/2026_SCRS_ENG.pdf

9 2026 SMA ATL-N STOCK ASSESSMENT MEETING – HYBRID, LISBON, 2026; Report of the 2026 ICCAT North Atlantic Shortfin Mako Shark Stock Assessment Meeting (including Blue Shark MSE) *(Hybrid, Lisbon, Portugal, 8–12 June 2026; p 9-12.*

10 REPORT OF THE STANDING COMMITTEE ON RESEARCH AND STATISTICS (SCRS) (Hybrid/ Madrid (Spain) – 21 - 25 September 2026) September 2026; 19.32 SCRS shall calculate the retention level of South Atlantic shortfin mako, Rec. 25-08 para 7 *(doc. SHK_18)*; https://www.iccat.int/Documents/Meetings/Docs/2026/reports/2026_SCRS_ENG.pdf

11 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



Although Rec 25-08 explicitly demands reporting of discarded shortfin mako, submission of estimates for live and dead discards, monthly reporting of any allowable landings and the submission of the shark check sheets as prerequisites for any future retention of shortfin mako by a CPC, the overview provided by the Secretariat in PA4_811_REV_1/2026[12] demonstrates that only 3 out of the 14 CPCs with allocated retention allowance should be eligible for retaining shortfin mako in 2027 as they have either a negative outstanding balance from overharvesting in previous years, not submitted the shark check sheets, not submitted the mandatory CP55 reporting and/or have not yet submitted the methodology for calculation of life and dead discards.
Indeed, only a few CPCs have consistently submitted live releases and dead discards from their fisheries throughout the last five years, while those that have continue reporting the majority of discards being dead discards instead of live releases although live shortfin mako should be released as unharmed as possible following the Minimum Standards for handling and live release outlined in Rec 25-08 Annex 2. This shows that these standards are either not complied with or too rudimentary as a stand-alone measure to reduce mortality in the absence of other measures that effectively avoid or at least reduce the bycatch of shortfin mako and reduce its at vessel mortality, including but not limited to time and/or spatial closures and a switch from wire traces to monofilament leaders, which has demonstrated to substantially reduce the mortality of threatened sharks in other RFMOs[13,14] and a number of scientific studies conducted throughout the past 15 years.
While other RFMOs, notably IOTC have made progress in defining more detailed gear and species-specific best handling and release guidelines for sharks no such initiative has been started at ICCAT, nor has the SCRS voiced an interest to adopt or at least build on the scientific work that has already been performed by the IOTC and the IATTC.

Blue sharks (*Prionace glauca*) and MSE for Blue sharks for North Atlantic and for South Atlantic stocks

In 2023 the Commission had instructed the SCRS to start evaluating the feasibility and potential timelines for the development of MSE tested Management Procedures for both stocks of blue sharks in the Atlantic. In 2025 the SCRS had confirmed the feasibility for both stocks and presented possible timeline options and since then has made considerable progress as presented at this year's PA4 Intersessional Meting.[15]
At that time the SCRS highlighted the need for operational management objectives for progressing the parallel development of North and South Atlantic BSH MSEs. Although no direct relationship was found between blue shark catches and shortfin mako mortality for the South Atlantic, concerns were raised as to such a relationship and the possibly negative impact of blue shark MSE tested MPs on rebuilding probabilities for the overfished shortfin mako stocks, as both species are caught by the same fleets, using the same gear.
The discussion however also concluded that consideration of shortfin mako bycatch does not per se require the development of a multispecies MSE, but could be addressed otherwise e.g. as part of the management objectives including bycatch limits for shortfin mako or as part of exceptional circumstances.

Total catches of blue sharks for 2025 accounted to 19,390 t in the North with only 408 t of discards reported by basically two CPCs only while many CPCs reported neither landings nor discards. In the South total catches of 23,251 t were reported with 916 t of discards reported by basically two CPCs, while most CPCs reported neither landings nor discards. This highlights the continued poor compliance with discard reporting requirements in the ICCAT area of competence raising concerns of total mortality of blue sharks being massively underestimated in both parts of the Atlantic and the currently adopted TACs not being sustainable. Especially since the Northern stock has been assessed in the 2023 stock assessment to be at the edge of being overfished (50.1% probability) and the Southern stock having been subject to overfishing for many years (54.5% probability)[16] a more

12 ICCAT Secretariat; South Atlantic shortfin mako (SMA-S): retention allowances for 2027; PA4_811_REV_1/2026; 16/11/2026 12:00
13 IOTC–WPEB20(DP) 2024. Report of the 20th Session of the IOTC Working Party on Ecosystems and Bycatch Data Preparatory Meeting. Online, 22 - 26 April 2024 IOTC–2024 WPEB20(DP)–R[E]: 49pp
14 Bigelow Keith and Felipe Carvalho WCPFC-SC17-2021/EB-WP-01, SCIENTIFIC COMMITTEE SEVENTEENTH REGULAR SESSION, Electronic Meeting 11-19 August 2021, Review of potential mitigation measures to reduce fishing-related mortality on silky and oceanic whitetip sharks (Project 101)
15 Report of the Intersessional Meeting of Panel 4 *(online, 7 and 8 July 2026); PA4_803/2026; 16/11/2026 12:00; https://www.iccat.int/Documents/Meetings/Docs/2026/reports/2026_PA4_ENG.pdf*
16 REPORT OF THE STANDING COMMITTEE ON RESEARCH AND STATISTICS (SCRS) (Hybrid/ Madrid (Spain) – 21 - 25 September 2026) September 2026; 12.14 BSH-Blue shark; https://www.iccat.int/Documents/Meetings/Docs/2026/reports/2026_SCRS_ENG.pdf



precautionary approach should be considered to be taken until MSE tested MPs can be implemented for both stocks.

Almost no catch data are available for the Mediterranean with only 56 t of blue sharks reported for 2025[16] making it highly unlikely that the planned stock assessment in 2027 will provide viable results when pursuing a traditional stock assessment approach for this critically endangered stock in the Mediterranean, which would very much benefit from a precautionary approach including a retention ban and gear modifications that avoid catching them in the first place and reduce at vessel mortality so that bycaught animals can be released safely.

Our Requests to the Commission for Blue Sharks:

1) We welcome the commitment of ICCAT to the long-term sustainable management of commercially valuable blue shark stocks and the progress made by the SCRS in developing MSE tested MPs for both stocks of blue shark as presented at the PA4 Intersessional Meeting. To support further SCRS work we urge the Commission **to adopt PA4-812 - Draft Resolution by ICCAT on operational management objectives for Atlantic blue shark.**
2) The Commission should **provide sufficient funding and capacity support for the further development work and avoid further delays in the adopted timeline**, trying to complete development of MPs for adoption by the Commission by 2028.
3) To reduce complexity and increase the probability of success within the foreseen timeline, the Commission should **take a precautionary approach for the short and long-term sustainable management of blue sharks instead of maximising yield. Bycatch concerns of other species, specifically the conservation needs for shortfin mako sharks should be addressed without complicating MSE development by pursuing a multispecies MSE**.
4) Ad interim, reduce the current TACs for blue sharks in the Atlantic to levels that will increase the probability of maintaining the stocks in the green quadrant of the Kobe plot with a probability of 70% or more until MSE tested MPs can be adopted and implemented. Based on the stock projections of the 2023 stock assessment a **reduction of the TAC to 25,000 t would provide such high probabilities for both stocks in 2029 and beyond.**
5) Consider the use of **alternative assessment methods that might be more suitable for data limited stocks** when attempting to perform a stock assessment of the Mediterranean blue shark stock in 2027 and task the SCRS to propose **precautionary measures based on the assessment outcome, even in the case of failure to successfully complete the assessment.**

Fins Naturally Attached without Exceptions

The European Union has adopted a strict Fins Naturally Attached regulation without exceptions in 2013 as Regulation (EU) No 605/2013 and since then an ever increasing number of other fishing nations and also several RFMOs and RFBs have adopted such a policy recognising that this is the only regulation to effectively ban the practice of finning at sea as it the only clearly enforceable policy, allowing for prosecution and eventual conviction in case of non-compliance.[17] While e.g. NAFO, NEAFC and GFCM have already adopted the policy no tuna RFMO has so far adopted a true "Fins Naturally Attached" policy, despite IATTC, WCPFC and IOTC all having adopted conservation and management measures that claim implementation of a Fins Naturally Attached policy, albeit continuing to allow several alternatives without an agreed timeline for transition to landing all sharks with their fins naturally attached, without exceptions.
By adopting Resolution 25-08 on the conservation of sharks caught in association with fisheries managed by IOTC, the IOTC has strengthened its policy for sharks landed frozen, allowing each CPC to select only one out of two alternatives in 2025 to be applied until 2028, subject to annual reporting of successful enforcement. In case of non-compliance, immediate forfeiting of the granted exemption to fins naturally attached will apply, while all

17 Ziegler I.; 'Fins Naturally Attached', the globally acknowledged best practice to prevent Finning – a review of the state of play and the effectiveness of alternatives. IOTC-2023-WPEB19-16_rev1; Working Party on Ecosystem and Bycatch Meeting 2023



sharks landed fresh must already be landed with all fins naturally attached, without exceptions. This makes the IOTC the most advances tuna RFMO towards a fins naturally attached policy albeit still subject to exemptions for sharks landed frozen and no agreed timeline for full transition.
However, ICCAT continues relying on the long-outdated fins-to-carcass ratio it had adopted in 2007 and has since then failed making any progress, although a proposal for fins naturally attached was submitted year after year, supported by an increasing number of CPCs over the past years, with an unprecedented number of ICCAT CPCs having co-sponsored the 2024 proposal.

A recently published report from the Environmental Justice Foundation highlights that finning of sharks continues in the Atlantic and in the ICCAT area of competence demonstrating that the existing ICCAT regulation is neither adequate to prevent nor to prosecute such offenses.

Our Requests to the Commission for Banning Finning:

1) **Adopt proposal PA4-807 – "Draft Recommendation by ICCAT concerning the conservation of sharks caught in association with fisheries managed by ICCAT"** submitted by the USA and EU and already co-sponsored by a number of other CPCs.
2) **Consider strengthening the proposal by adding a definition for sharks** ideally as all elasmobranchs or at least adopting the definition of IOTC Res 25/08 as "all species belonging to the 8 orders of Selachimorpha (Carcharhiniformes, Lamniformes, Orectolobiformes, Heterodontiformes, Squaliformes, Squatiniformes, Hexanchiformes, and Pristiophoriformes) and all species of the order of Rhinopristiformes".
3) **Do not accept any alternative measures** as proposed in proposal PA4-806 – "Draft Recommendation by ICCAT concerning the conservation of sharks caught in association with fisheries managed by ICCAT" submitted by Japan

Vulnerable shark species caught as a bycatch by ICCAT fisheries

Compliance with existing best handling and release guidelines can substantially decrease mortality rates and increase post release survival of those sharks that either must not be retained or are released voluntarily by the fishery as an unwanted incidental catch. However, so far ICCAT has only adopted rather rudimentary "Minimum standards for safe handling and live release procedures" for shortfin mako sharks and "Guidelines for safe handling and release of whale sharks" whereas no gear specific guidelines exist for any other shark species., although a number of threatened shark species are subject to non-retention policies at ICCAT and would substantially benefit from such guidelines. Other RFMOs, specifically IOTC and IATTC have already discussed and compiled an extensive catalogue of gear specific handling and release practices for bycaught sharks and the Scientific Committee of the IOTC recommended in 2025 that the Commission should in 2026 consider adopting the Minimum Standards for safe handling and live release procedures as compiled by the IOTC Working Party on Ecosystem and Bycatch in Annex XVII of the 2025 WPEB report.[18] An update of these practices has been completed by an IOTC WPEB expert group throughout 2026 and will be presented to the Scientific Committee for endorsement in December. These standards could also be adopted by ICCAT fisheries.

Silky sharks (*Carcharhinus falciformis*)
Rec 11-08 bans the retention, transhipment and landing of silky sharks since 2012 but developing coastal states are exempted provided that "CPCs exempted from the prohibition pursuant to this paragraph shall not increase their catches of silky sharks" and condition to implementation of measures that prevent silky sharks from entering the international trade. Between 2020 and 2022 an average of 250 - 350 t of silky sharks were landed per year but in 2023 and 2024 landings doubled to 700 – 800 t dominated by landings from the purse seine fleet of

18 Indian Ocean Tuna Commission Working Party on Ecosystems and Bycatch (IOTC WPEB). (2025) IOTC–WPEB21(AS) 2025. Report of the 21st Session of the IOTC Working Party on Ecosystems and Bycatch. Assessment Meeting. France and Online, 9 - 13 September 2025. IOTC–2025–WPEB21(AS)–R[E]: 148pp Appendix XVVII Suggested Revision to Annex III of Resolution 25/08 (the live release handling procedures for sharks)



one developing coastal CPC. Furthermore, an increase of catches to these amounts with less than 20 (active) purse seine vessels might indicate that this fleet targets silky sharks.[19]

Hammerhead sharks (Sphyrnidae)

Due to their high vulnerability to overfishing and the high value of their fins in the international fin trade hammerhead sharks are among the most endangered family of sharks with all species qualifying as species of the greatest biological vulnerability and conservation concern for which there are very few data. Adults are caught by several ICCAT fisheries and juveniles are heavily exploited by inshore fisheries in their shallow coastal nursery grounds. ICCAT has banned the retention of all species of the family of Sphyrnidae except for *Sphyrna tiburo* since 2011 (Rec 10-08). Since 2020 *Sphyrna tiburo* has been re-classified as "Endangered"

From 2020 to 2025 between 200 and 500 t of hammerhead sharks were landed annually at ICCAT reported only at the level of Sphyrna spp. thereby severely hindering the assessment of total mortality of individual stocks of these globally threatened sharks, including *Sphyrna lewini*, *Sphyrna zygaena* and *Sphyrna mokarran,* all of which have been listed on Appendix I of CMS in 2026.[20]

Thresher sharks (Alopias spp.)

In March 2026 all three species of Alopiidae were listed under App. I of CMS in 2026 thereby requesting "all Signatories that exercise jurisdiction over any part of the range of these species or their vessels engage in taking them are required prohibiting the "taking" of such animals which refers to hunting, fishing, capturing, harassing, or deliberately killing, and includes attempts to engage in such activities."

ICCAT Rec 09-07 currently only prohibits the retention of bigeye thresher sharks (*Alopias superciliosus*), and instructs that CPCs "should strongly endeavour to ensure that vessels flying their flag do not undertake a directed fishery for species of thresher sharks of the genus Alopias spp."

Between 2020 and 2025 an amount of 70 t - 500 t of thresher sharks was landed annually mostly only reported as Alopias spp..[21]

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

1) The Commission should **require all CPCs initiating additional research for all gear types to minimize, and where possible eliminate, incidental captures and to increase the post-capture survival** of incidentally caught species by adopting gear-specific mandatory best handling and live release guidelines as developed by IOTC.
2) All exemptions from retention bans for developing coastal CPCs should be limited to subsistence fisheries and **subject to demonstrated compliance with all conditions set up in the respective ICCAT Recommendations.** In case of substantially increased catches or if proof of compliance is not provided at the latest by the time of the 2027 SCRS Meeting then the current exemptions should expire for those CPCs.
3) ***Sphyrna tiburo* should no longer be exempt from the retention ban set out in Rec 10-08**. As hammerhead sharks are easy to differentiate from other sharks but difficult to tell apart especially when still in the water, removing this exemption would not only improve monitoring of compliance but also reduce at vessel mortality as releasing the sharks while still in the water, cutting the line as closely to the hook as possible has proven to substantially increase survival. Applying these best handling and live release guidelines will be facilitated considerably by including all "look alike" species in the ban, so that no hammerhead species are brought on board of the vessel but released in the water, thereby reducing mortality of these sharks that are subject to high at vessel and post release mortality once brought on board.

19 ICCAT STA-001A_ Task 1. Nominal catches (landings + dead discards) t1nc-20261112_20261112103343 data file from 12 November 2026 downloaded from filtered for L (landings) of *Carcharhinus falciformis*

20 ICCAT STA-001A_ Task 1. Nominal catches (landings + dead discards) t1nc-20261112_20261112103343 data file from 12 November 2026 downloaded from filtered for L (landings) of Sphyrnidae

21 ICCAT STA-001A_ Task 1. Nominal catches (landings + dead discards) t1nc-20261112_20261112103343 data file from 12 November 2026 downloaded from filtered for L (landings) of Alopiidae



4) **Rec 09-07 should be updated extending the retention ban for bigeye thresher sharks to all species of Alopias** to strengthen the existing conservation measure and remove ambiguity as differentiation between the three species of Alopias is known to be difficult and species identification requires sharks to be brought on board, thereby lowering their chances of survival.

Additionally .....

The extensive use of drifting FADs in the purse seine fishery at ICCAT has repeatedly raised concerns as to the negative impact these FADs might have on the mortality of juvenile yellowfin and bigeye tuna but also concerns about the bycatch of endangered, threatened and protected species (ETP species) when the use of drifting FADs has substantially increased since 2016 as purse seiners targeting mostly skipjack transitioned from setting on free schools to setting on drifting FADs, to aggregate schools of tuna beneath those FADs, thereby substantially increasing the efficiency of industrial purse seine fishing. Mainly juvenile silky sharks are known to aggregate and staying associated for a substantial part of their life with these dFADs and thereby being caught in huge numbers when vessels set on them. The same applies to oceanic whitetip sharks that are however by now caught in much lower numbers due to the critically depleted stage of this species in all oceans. Also, considerable bycatch of mobulid rays in these sets is known as is the bycatch of other ETP species, including cetaceans depending on the fishing region. While several bycatch mitigation measures have been tested and voluntarily adopted by some fleets trying to increase the proportion of silky sharks that are released alive and to improve post release survival, neither the availability of technical measures, nor the application of best handling and release guidelines have been made mandatory by ICCAT and overall mortality for silky shark bycatch still ranges between 50 and 80%, depending on the fishery. [22,23,24]

ICCAT reports around 150 t of discarded silky sharks annually (dead or alive) between 2020 and 2025 by the purse seine fleets, but only few fleets have reported their discards at all, adding to the widespread non-compliance with shark discard reporting requirements at ICCAT and other tuna RFMOs that continues limitation of assessment of total mortality of these vulnerable species.[25]

Furthermore, these drifting FADs often get lost or are abandoned by the fisheries contributing substantially to marine pollution as the majority construction is still made up of non-biodegradable materials and plastics and lost FADs are known to result in hugely negative impacts on vulnerable marine habitats when beaching e.g. on coral reefs. Therefore, Rec 24-01 set out requirements to limit the number of FADs, improve monitoring of FADs and reduce their impacts on ETP species by requiring the immediate transition to fully non-entangling construction designs and a phased transition to fully biodegradable designs by 2029.

22 Hutchinson. M. Itano. D. Muir. J. Leroy. B. Holland. K. 2015. Post-release survival of juvenile silky sharks captured in tropical tuna purse seine fishery. Marine Ecology Progress Series. 521: 143-154.

23 Leire Lopetegui-Eguren, Maitane Grande et al; Post-release survival of silky sharks in tropical tuna purse seine fishery under best handling and release practices: insights from tagging and predictive modelling; IOTC-2026-WPEB22-35_rev2; https://iotc.org/sites/default/files/documents/2026/09/IOTC-2026-WPEB22AS-35_-_SilkySharkPostRelease_rev2.pdf

24 Grande M, Onandia I, Galaz JM, et al (2022) Assessment on accidentally captured silky shark post-release survival in the Indian Ocean tuna purse seine fishery. In: IOTC - 3rd Ad Hoc Working Group on FADs. IOTC-2022-WGFAD03-09, Online

25 ICCAT STA-001A_ Task 1. Nominal catches (landings + dead discards) t1nc-20261112_20261112103343 and STA-002A_ Task 1. Nominal catches (live discards) t1nc-20261112-DL_20261112103402 data files from 12 November 2026 downloaded from filtered for DD and DL of *Carcharhinus falciformis*



Our Requests to the Commission for the Management of Drifting FADs

1) Proposal PA1-509 – "Recommendation by ICCAT on a multi-annual conservation and management programme for tropical tunas (replacing Recommendation 24-01)" should **NOT be adopted** as it aims to remove the current FAD closure and to extend the previously by ICCAT adopted timeline for the transition to biodegradable FADs until 2029, respectively until 2031 drifting FADs are known to account for substantial bycatch of juvenile silky sharks, with high at vessel and post release mortality.
2) We recommend to **not further reduce the annual FAD closure and instead recommend that the Commission reexamines the effectiveness of the FAD closure prior to any further reduction** or removal of the current 45-day closure, requesting the SCRS to evaluate in 2027 the effectiveness of the current closure and to provide specific scientific advice on the recommended length of the FAD closure. No reduction of the closure should be adopted in 2026 without SCRS advice existing, especially since the adoption of the multi-stock tropical tuna management procedure was delayed until 2027, so reducing the FAD closure before then would be premature.
3) We acknowledge that there may be justified technical reasons to delay the transition to fully biodegradable FADs of Cat I until 2031 **BUT we do not see that the transition to Cat II designs that should have happened by the end of 2026 should now be delayed by another 3 years**, based solely on the reference to the timeline adopted by IATTC and the provided explanation in the proposal, saying "taking into account the current state of play of the development of biodegradable FADs".

Both, the sustainable management of commercially targeted sharks and the protection of vulnerable sharks in need of effective bycatch mitigation measures heavily depend on a comprehensive management, reporting and compliance system in place to ensure adopted measures and reporting requirements are equally complied with by all parties and no IUU fishing or overharvesting are occurring. Therefore, it is important for ICCAT to also make progress in these areas and improve its performance, specifically also in its capability to execute effective CMS measures and enforce compliance.

Our Recommendations for other important proposals and measures that are relevant to sharks

We strongly support the following proposals submitted to the Commission and recommend that these should be adopted.

1) PWG-437 – "Draft Recommendation by ICCAT establishing a ban on driftnets for the capture of certain ICCAT species" proposing to ban the use of driftnets in the convention area when targeting large pelagic species such as tropical tuna, tuna-like species and sharks
2) ICCAT requires observer coverage at 100% for purse seiners, 20% for bluefin tuna (*Thunnus Thynnus*) and 10% coverage for tropical tuna longline vessels. The SCRS has however advised for many years that a minimum coverage of 20% would be needed to improve data availability for stock assessments. For less frequently caught bycatch species even higher levels are required. Therefore, we strongly recommend that the Commission adopts a minimum coverage of 20% for all longline vessels, using either human or electronic methods, with an intent to achieve a stepwise increase to 100% with an agreed timeframe.
3) PWG-428 – "Draft Recommendation by ICCAT for a Joint international inspection scheme in the Convention area in areas beyond national jurisdiction" aims to finally find agreement on the adoption on this highly important and longtime overdue measure, that could greatly improve compliance and reduce IUU fishing activities.
4) PWG-435 – "Draft Recommendation by ICCAT concerning the establishment of an ICCAT Record of vessels authorized to operate in the Convention area (replacing Recommendation 25-12)" aims to extend the requirement of vessels to be registered in the ICCAT Record of vessels to all vessels above 15 m.

5) PWG-436 – "Draft Recommendation by ICCAT concerning minimum standards for Vessel Monitoring Systems in the ICCAT Convention area" introducing the mandatory availability and activation of AIS for all vessels bigger than 15 m to improve transparency and compliance.
6) Draft Recommendation concerning the implementation of an Ecosystem Approach to Fisheries Management (EAFM) is an urgently needed improvement which we fully support.

Please contact:

Dr. Iris Ziegler
Head of Fisheries Policies and Ocean Advocacy at
Deutsche Stiftung Meeresschutz (DSM)
iris.ziegler@stiftung-meeresschutz.org
What's App +49 174 3795190

Deutsche Stiftung Meeresschutz
Badstr. 4
81379 München
Tel.: 089 - 71 66 81 88
www.stiftung-meeresschutz.org