

Statement to the Compliance Committee 2025

Ensuring Compliance with ICCAT's Shark Measures

As the implementation of international shark safeguards is vital to their success, the Ecology Action Centre and its coalition partners have prioritized participation in ICCAT's Compliance Committee (COC) processes. We are grateful for the associated opportunities and applaud the Secretariat for ensuring transparent inclusivity and continual practical improvements. We also appreciate that several Parties have recently reported new, long-awaited domestic shark regulations to implement ICCAT obligations.

SHARK CHECK SHEET PROGRESS

We are pleased that ICCAT's "Shark Check Sheets" are evolving into a useful tool to gauge and promote adherence with shark conservation obligations. We welcome the **Shark Check Sheet submission exemption procedure** developed by the SCRS, as requested by the COC. This straight-forward process:

- provides for a transparent record of discussions;
- establishes clear roles and timelines; and
- requires Parties to make a strong case for any exemption.

For the fourth year running, our analysis of these sheets shows incremental improvements. We welcome first-time, detailed reports from three CPCs as well as substantive improvements in 13 CPCs' submissions, including:

- Greater detail, accuracy, and clarity regarding implementation, inspection, and data collection;
- A 30% decrease in CPCs claiming a shark species does not occur in their waters or is not encountered by their fleet (a response deemed unacceptable by the COC);
- Fewer Parties claiming that they 'do not target' sharks (another unacceptable response); and
- A 21% increase in CPCs reporting relevant, legally binding, domestic regulations, including regulation title, number and/or link for verification.

PERSISTENT SHARK CHECK SHEET SHORTCOMINGS

Aside from this progress, we are disappointed that eleven CPCs **failed to submit** Shark Check Sheets; five of these failed to report despite having done so before.

We are seriously concerned that nearly half of CPCs are failing to meet their obligations to promulgate and report on **specific domestic regulations** associated with ICCAT Recommendations. Often this applies to multiple measures, including ones in place for a decade or more.

Of particular concern are the eight CPCs that claim developing coastal state, local consumption exemptions for the **hammerhead and silky shark retention bans** but fail to report the domestic measures in place to ensure these sharks do not enter into international trade.

ASSOCIATED MATTERS

We appreciate the consideration and acknowledgement of our CPC-specific queries (**COC_312**). We look forward to exchanging additional information on the topics raised, particularly international shark fin trade that has been prohibited under ICCAT measures.

With respect to the application of Rec 11-15 (**“No Data, No Fish”**), COC_303 Appendix 3 identifies nine CPCs that have not submitted Task 1 shark data. Rec 11-15 Paragraph 3 dictates that these CPCs should be immediately prohibited from retaining such species until the Secretariat receives this catch data.

We stress that widespread non-compliance with **shark discard reporting** remains a serious problem and challenge to proper implementation of ICCAT shark measures. In particular, as raised in the Shark Working Group, the discrepancy between reported and observed discards of *Critically Endangered* oceanic whitetip sharks is alarmingly high and warrants focused attention.

We remain deeply concerned over insufficient **observer coverage** for high seas fisheries taking sharks, as such monitoring is necessary for gathering essential species-specific catch information and enforcing vital safeguards. CPCs have had roughly a decade to institute the ICCAT-mandated minimum standards; emerging technologies and 2023 commitments to electronic monitoring standards should be easing burdens to comply.

REQUESTS FOR ACTION

Accordingly, and in light of the great risks facing exceptionally vulnerable sharks, we urge the COC to:

- Stress for CPCs that shark measures apply to *all* ICCAT fisheries whether sharks are targeted or taken incidentally, landed or discarded;
- Adopt the Shark Check Sheet submission exemption procedure developed by the SCRS;
- Immediately prohibit the nine CPCs identified in COC_303 Appendix 3 from retaining the shark species for which they owe Task 1 data;
- Prioritize a comprehensive review of compliance with discard reporting obligations, and assign action plans to CPCs with recurring non-compliance;
- Increase scrutiny of CPCs' adherence to retention bans and/or associated landing conditions for hammerhead, silky, bigeye thresher, and oceanic whitetip sharks; and
- Flag the CPCs failing to comply with minimum observer coverage requirements, request associated action plans, and identify those with recurring issues.