

**ICCAT 2020**  
**Opening Statement on Protecting Mako Sharks**  
**Panel 4**

The Ecology Action Centre -- with support from The Ocean Foundation, Shark Trust, Project AWARE, Defenders of Wildlife, Humane Society International -- appreciates this opportunity to comment on proposals regarding our top priority for Panel 4 attention this year: shortfin mako sharks.

ICCAT scientists have warned about the inherent vulnerability of slow growing shortfin mako sharks for more than a decade. To prevent overfishing and collapse, they have recommended, *inter alia*, a South Atlantic 2001t TAC and a North Atlantic retention ban for several years running. The outlook for this species continues to deteriorate because this advice has yet to be heeded.

**Spotlight on the North Atlantic**

The recommendation to prohibit retention of shortfin mako sharks from the seriously overfished and declining North Atlantic population has been the cornerstone of the SCRS advice on this species for four years straight. We strongly oppose proposed allowances to continue landings because:

- Exceptions run counter to advice that resulted from thorough examination and deliberation by experts and explicitly states that the non-retention policy should be "***without exception***" and
- Allowing valuable makos to be landed if they are dead creates an incentive (not necessarily to "target" them but) to ensure that they arrive at the boat dead, which can be achieved through irresponsible fishing practices that unnecessarily increase mortality.

**TACs and dead discards**

In developing TAC scenarios, the SCRS thoroughly considered all sources of mako mortality, *including dead discards*, and concluded that a complete retention ban is the most effective way to achieve the reductions necessary to rebuild within about five decades. To reach the green quadrant of the Kobe plot by 2070 with at least 60% probability, the TAC (*including dead discards*) has to be 300t or less. Hence, their recommendation for a non-retention policy, without exceptions.

Management strategies for inherently vulnerable sharks like makos should incorporate chances for success that far exceed those of a coin toss. We recommend following the example set by the U.S. for its domestic shark fisheries: base decisions on a 70% probability of reaching targets. The repeated delays in ending the mako overfishing that was identified in 2017 bolster the argument for taking an especially precautionary approach now. The TACs proposed by ICCAT Parties for the North Atlantic are unacceptably risky.

Mako sharks will unfortunately be discarded dead under any scenario that allows longline fishing. This reality should be mitigated over time but does not justify rejecting the advice for an immediate ban.

Indeed, ICCAT has adopted retention bans for many other shark species. Several ICCAT Parties require that these and other threatened species -- including basking sharks, whale sharks, and white sharks - - be discarded, dead or alive, primarily to remove incentive to encounter and kill them.

## **Comments specific to Party proposals**

### **Proposal from Canada (PA-806)**

We applaud Canada for presenting the only mako proposal that matches the increasingly urgent scientific advice for shortfin mako sharks, offers realistic hope for rebuilding the North Atlantic population within the next fifty years, and addresses needs in the South Atlantic.

We urge Parties to promptly support this proposal, including through co-sponsorship and comments to the Panel 4 Chair for inclusion in the meeting report.

### **Proposal from the U.S. (PA-805)**

We congratulate the U.S. for dramatically reducing shortfin mako mortality in recent years and working to address shark bycatch mortality in domestic fisheries. Despite these advances, we cannot support the excessive TACs outlined in this proposal or the unnecessary, intentional killing of makos that make it to the boat alive.

We welcome future SCRS advice specific to the effects of circle hooks on the mortality of makos and other sharks. In the meantime, the centerpiece of the SCRS advice remains a ban on retention, a policy that the U.S. currently applies domestically to roughly 20 species of Atlantic sharks.

We recognize that Parties had differing roles in the depletion of North Atlantic makos, but it is now clear that the most prudent, effective, and expedient road to recovery involves the across-the-board adoption of the primary recommendation by all Parties.

### **Proposal from the EU (PA-804)**

We are deeply concerned that the 500t TAC proposed by the EU does not account for dead discards. It is therefore misleading, as it is not comparable to the SCRS TAC projections (that include dead discards), as well as seriously inadequate as a recovery strategy.

We disagree that the EU proposal "elements fully address any concerns about creating a marketing incentive to target these fish, and therefore undermine the only real argument put forward to justify a total retention ban" in that this is not "the only real argument" and this does not accurately reflect our argument (see above).

While shortfin mako sharks are clearly now too rare to be effectively targeted in the North Atlantic, they remain one of the world's most valuable sharks. Moreover, an increase in mako meat prices was reported by Spanish media earlier this year. Hence, we reassert that only a complete ban, as advised by the SCRS, creates an incentive to avoid makos in the first place.

We agree that the 2019 CITES listing holds promise for bolstering mako conservation, but stress that associated trade measures are not automatic, depend on implementation at the national level, and should be directly linked to sustainable fishing limits.

We are pleased that Spain has recently reduced its shortfin mako landings but note they remain unsustainable while Portugal’s landings have increased by ~30% since 2014. In fact, EU landings alone in 2019 (1155t) exceeded the highest level of mortality assessed by the SCRS.

While we too hope for commitment and “buy-in” from industry to boost fishery management effectiveness, we reject the notion that conservation action should be limited to what vested interests are willing to accept, regardless of expert advice, treaty obligations, and opinions of other stakeholders. We urge the EU to instead be guided by the science.

To be clear, during 2019 mako advice questioning, the SCRS Vice Chair used the now famous phrase “no conservation value” to describe dead discards, not the advised retention ban. The shark experts on the SCRS, including the Vice Chair, spent many hours explaining in detail the mako advice in their 2019 report. We encourage the EU to focus on this document, as it reflects a broader picture that factors in all sources of mortality, including dead discards.

### **Summary**

To prevent irreparable collapse and minimize long-term negative impacts for all stakeholders, we need immediate, concerted, effective action across the North Atlantic in the form of the recommended retention ban. To prevent a similar crisis from unfolding in the South Atlantic, we need science-based catch limits.

***It’s make or break time for makos. We urge Parties to adopt Canada’s proposal this year.***

