Statement from Deutsche Stiftung Meeresschutz (DSM) to the 29th Session of the Indian Ocean Tuna Commission on La Réunion, 13-17 April 2025

The Indian Ocean is a hotspot of biodiversity, also known for its unique megafauna. However, it has become an area of significant conservation concern for sharks and rays as shark populations have suffered severe declines in the Indian Ocean. Two thirds of threatened sharks, rays and chimaeras are at risk of extinction from overfishing alone and while most sharks are caught as "bycatch" 99% of them are retained, marketed and traded[1]. Globally the risk extinction of sharks and rays has increased by 19% since 1970 and abundance declined by 50%. Fishing has been identified as the single biggest reason for these declines in all oceans, with only 7% of the 1,186 assessed chondrichthyans considered not threatened by fishing[2]. Half of all oceanic sharks and rays are already classified as endangered or critically endangered with more than 70% of declines in abundance over the last 50 years[3]. Tuna fisheries are a major driver of shark "bycatch" due to the high spatial overlap between sharks and tuna, combined with the poor selectivity of pelagic longlines, purse seine fishing on drifting FADs, and gillnet fishing practices.

In the IOTC Area of Competence, sharks are however also targeted by both industrial and artisanal fisheries, whereas the IOTC's mandate officially covers only species listed in Annex B of the IOTC Agreement, which currently does not include pelagic sharks or rays. This has resulted in "*incomplete fisheries management and conservation coverage*" as highlighted in the 2nd IOTC Performance Review as sharks are only "managed" as a bycatch[4]. However, IOTC has in the past demonstrated its ability to adopt specific shark management and conservation measures, as demonstrated in Resolution 18/02, which aimed to start managing blue sharks *ensuring long-term sustainability of the stock* including measures such as a "catch limit for each CPC" or additional conservation and management measures "to reduce the mortality of blue shark, improving selectivity of fishing gears, spatial/temporal closures or minimum conservation sizes" and tasking the Scientific Committee "to provide advice, if possible, on options for candidate limit, threshold and target reference points for this species". So far however, no measures have been implemented, neither for blue sharks nor any other shark.

Despite the advice of the Scientific Committee to take a precautionary approach and to implement additional measures for species such as shortfin mako, oceanic whitetips, and silky sharks, the Commission has so far failed to adopt any such measures beyond the existing requirements of reporting of catches, full utilization of sharks, and the three existing retention bans in the Area of Competence for oceanic whitetip sharks, thresher sharks and mobulid rays.

Thereby the IOTC has been lagging far behind other tuna RFMOs and only eight key pelagic shark species - blue shark, oceanic whitetip sharks, scalloped hammerhead sharks, shortfin mako sharks, silky sharks, bigeye thresher sharks, pelagic thresher sharks, and porbeagle sharks – are reviewed systematically by the Scientific Committee, despite evidence that more than 20 other shark species are known to regularly interact with IOTC tuna fisheries.[5]

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[1] Jabado, R.W., Morata, A.Z.A., Bennett, R.H., Finucci, B., Ellis, J.R., Fowler, S.L., Grant, M.I., Barbosa Martins, A.P., & Sinclair, S.L. (eds.) (2024). The global status of sharks, rays, and chimaeras. Gland, Switzerland: IUCN. ISBN: 978-2-8317-2318-1 (PDF), DOI: https://doi.org/10.59216/ssg.gsrsrc.2024

[2] Pollom RA, Cheok J, Pacoureau N,Gledhill KS, Kyne PM, Ebert DA, et al. (2024) Overfishing and climate change elevate extinctionrisk of endemic sharks and rays in the southwestIndian Ocean hotspot. PLoS ONE 19(9): e0306813.https://doi.org/10.1371/journal.pone.0306813

[3] Pacoureau N. Cassandra L. Rigby. Peter M. Kyne. Richard B. Sherley. Henning Winker. John K. Carlson. Sonja V. Fordham. Et. al. Half a century of global decline in oceanic sharks and rays. Nature Vol 589, 2021; https://doi.org/10.1038/s41586-020-03173-9

[4] IOTC, 'Report of the 2nd IOTC Performance Review' IOTC–2016–PRIOTC02–R[E]' (2016) 7–8

[5] Patterson, H, D'Alberto, B & Bromhead, D 2024, A summary of key information pertaining to pelagic shark catches status and management in the Indian Ocean Tuna Commission, ABARES technical report 24.05, Australian Bureau of Agricultural and Resource Economics and Sciences, Canberra, April, DOI: 10.25814/fbbb x480

We appreciate that four shark proposals have been tabled for this year's Commission Meeting by several CPCs and hope that the Commission will take an important step forward at this year's meeting by adopting urgently needed measures for the management and conservation of sharks.

We especially welcome the most comprehensive compilation of shark measures proposed by the Maldives, South Africa and Pakistan in proposal IOTC-2025-S29-PropT[E] which we hope the Commission will adopt, but also emphasize that a strong management and conservation measure needs to be adopted for shortfin mako sharks.

We also remind ALL CPCs that commercially exploited sharks such as blue sharks and shortfin mako sharks, must be classified as (secondary) target stocks under UNCLOS and the UNFSA and thus in principle require management in line with the requirements defined in UNFSA for target stocks. From a legal perspective it is therefore not for the RFMOs to designate a species as "bycatch" or "non-target" to avoid relevant obligations as (secondary) target stocks under UNCLOS and UNFSA.[6,7]

We support the call in Proposal IOTC-2025_S29_PropR submitted by the Maldives urging all CPCs to ratify the BBNJ Agreement, an important but unfortunately still very slow progress that needs to be completed before the agreement can become effective.

Fins Naturally Attached:

The Commission should adopt a 'Fins Naturally Attached' (FNA) measure for all sharks and all fisheries without exemptions. Whenever alternative methods such as the ones presented in Proposal IOTC-2025-S29-PropE-REV1 are proposed, scientific evidence should be provided demonstrating that the proposed alternatives are equally effective or superior to 'Fins Naturally Attached' in preventing finning from happening by enabling successful prosecution and conviction of offenses. Furthermore, when referring to measures adopted in the Pacific it is mandatory to note that WCPFC and IATTC have adopted similar but not really the same measures. Therefore, the IOTC should not be misled by an attempt to harmonize measures across oceans but rather use a Fins Naturally Attached measure without exceptions as adopted e.g. by NAFO, NEAFC, GFCM and many member states for guidance. Secondly the proposed measures fall short of what has been adopted by the WCPFC in CMM 2024-05, as the WCPFC definition for sharks as "all Chondrichthyes" is missing as are the additional reporting and review requirements that are commanded as part of the WCPFC measure. Also, CMM 2024-05 intends to reassess the suitability of the granted exemptions again in 2027.

- Adopt a Fins Naturally Attached measure of all sharks as described in proposal IOTC-2025-S29_PropT[E] and IOTC-2025-S29_PropK[E] without exemptions ensuring a clear definition of sharks is provided

Sustainable Management of Commercially Targeted Sharks: Blue Sharks:

Blue sharks are targeted by many fisheries, both industrial and artisanal fisheries in the IOTC Area of Competence, but despite the measures described in Resolution 18/02 neither a catch limit,

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[6] Rosello Mercedes., Schatz Valentin, van der Marel Eva Opinion on the Conformity of the European Union's Position with the UNFSA concerning the Conservation and Management of North Atlantic Shortfin Mako Shark at ICCAT, November 2021, https://www.prowildlife.de/wp-content/uploads/2022/01/7112021-mako-legal-opinion-final.pdf

[7] Schatz Valentin, Kachelriess Daniel, Untangling the Net of 'Bycatch' in Commercial Shark Fisheries: The Interplay between International Fisheries Law and CITES; prepared for Sharkproject Germany and the Gallifrey Foundation; October 2023; https://gallifrey.foundation/Shark%20protection%20Opinion.pdf

nor an allocation or the development of target, limit, and threshold points for this stock has been started. While the last stock assessment in 2021 concluded the stock not to be overfished and not to be subject to overfishing, the Scientific Committee had warned that increasing current catches is likely to result in decreasing biomass and the stock becoming overfished and subject to overfishing in the near future.[8]

Furthermore, it is important to note that the stock assessment had to use estimated catches rather than reported catches as in view of the poor reporting compliance at species level and the absence of any reporting of discards, the scientists had to estimate total mortality. Reported catches have increased since 2019 while uncertainty of reporting and total mortality have remained.

- As blue sharks are an economically valuable target stock the Commission should allocate adequate resources and prioritize the initiation of Management Strategy Evaluation (MSE) simulations for blue shark in 2025, task the WPM to start developing Management Procedures (MP) for blue sharks following the outcome of the 2025 scoping study for adoption of MPs by the Commission in 2027 at the latest.
- In line with Resolution 18/02, a catch limit should already be adopted and equitably allocated either at this Commission Meeting based on reported catches between 2019 and 2023 following a precautionary approach or at the latest in 2026 taking into account the outcome of the 2025 stock assessment but already allocating quotas between CPCs in 2025 based on the latest reported catches.
- When adoption a TAC for blue sharks this should be done based on a Total Allowable Catch, including discards and post release mortality and providing a probability of at least 60% to maintain this stock in the green quadrant of the Kobe Plot over the next 10 years.

Sustainable Management of Commercially Targeted Sharks: Shortfin Mako Sharks

Shortfin mako sharks received the highest vulnerability ranking in the semi-quantitative ecological risk assessment (ERA) for longline gear (No. 1) because of their low productivity and high susceptibility to longline gear.[9] After the failed stock assessment in 2018 the Scientific Committee had advised that the Commission should take a cautious approach by implementing management actions that reduce fishing mortality on shortfin mako sharks, but no measures were taken and reported catches stayed at a high level of 2,000 to 3,000 tons per year. The 2024 stock assessment concluded that shortfin mako sharks are both, overfished and experiencing overfishing.[10]

In view of this historic failure to proactively reduce mortality the Commission should now take a precautionary approach following management advice. The Scientific Committee considers that a TAC of 1,217.2 t is required to rebuild this stock into the green quadrant within the next 10 years, but this TAC will only provide a 50.2% probability of success. Therefore, the Commission should pursue a higher probability for this stock in line with what has been adopted by ICCAT for the same species and following international recommendations that pelagic sharks do require a 70% probability. [11]

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[8] IOTC–WPEB17(AS) 2021. Report of the 17th Session of the IOTC Working Party on Ecosystems and Bycatch; Assessment Meeting. Online, 6 – 10 September 2021; IOTC–2021–WPEB17(AS)–R[E]: 90 pp

[9] Murua H, Santiago, J, Coelho, R, Zudaire I, Neves C, Rosa D, Semba Y, Geng Z, Bach P, Arrizabalaga, H., Baez JC, Ramos ML, Zhu JF and Ruiz J. (2018). Updated Ecological Risk Assessment (ERA) for shark species caught in fisheries managed by the Indian Ocean Tuna Commission (IOTC). IOTC–2018–SC21–14_Rev_1.

[10] IOTC–WPEB20(AS) 2024. Report of the 20th Session of the IOTC Working Party on Ecosystems and Bycatch Assessment Meeting. Seychelles and Online, 9 – 13 September 2024 FAO Fisheries Department IOTC–2024–WPEB20(AS)–R[E]: 122pp

[11] NOAA; DRAFT Amendment 14 to the 2006 Consolidated Atlantic Highly Migratory Species Fishery Management Plan; September 2020; Highly Migratory Species Management Division Office of Sustainable Fisheries National Marine Fisheries Service

The Commission should consider also the lessons learnt from the Atlantic where efforts to reduce mortality had miserably failed when trying to use the same approach as now proposed in IOTC-2025-S29-PropQ[E], suggesting that only dead shortfin mako sharks may be retained and only when an observer or a functioning EMS is on board to verify the state of the animal.
We appreciate the proposal IOTC-S29-PropK_REV1 acknowledges scientific advice and the recommendation from the Scientific Committee to limit and allocate total mortality to a level that will allow this overfished stock to rebuild within 10 years. However, at a probability of barely above 50% this recommendation falls short to consider the substantial uncertainties and additional risks that may hinder rebuilding of the stock. Furthermore, the tabled proposal suggests the implementation and allocation of a TAC in 2030, which will then be way too late to achieve the rebuilding until 2033 and allows for continuation of overfishing of the stock until then, thereby further decreasing probability to bring this stock back into the green quadrant of the Kobe plot.
Shortfin mako sharks are caught mostly by longline fisheries that target also swordfish and blue sharks and are not n incidental bycatch. As a result, the incentives from retaining dead sharks have prevented the implementation of measures to reduce on-board mortality both, in the Atlantic and in the Indian Ocean. As demonstrated in Table 1 at-vessel mortality in the Atlantic is high with about 60% of all discarded shortfin mako sharks being discarded dead, while fleets using monofilament leaders have demonstrated that more than 70% of shortfin mako sharks caught on longlines can be released alive.

Table 1: Fishing related mortality of shortfin mako in the North Atlantic, including landings (L), dead discards (DD), and live releases (DL) all in metric tonnes (mt)

Catch in mt	**2021**			**2022***			**2023***		**% live releases of total discards**		
	L	**DD**	**DL**	**L**	**DD**	**DL**	**DD**	**DL**	**2021**	**2022**	**2023**
Spain	0	585	329	0	588	331	936	705	36	36	43
Portugal	202	14	26	1	141	256	87	158	65	64	64
Japan		15	11	0	10	7	14	10	42	41	42
Canada		22	63	0	26	83	12	23	74	76	66
Maroc	299			n/a	n/a	n/a	125	216	n/a	n/a	63
USA	39	4	68	40	10	47	29	43	94	82	60
Total Mortality**	**1,364**			**1,077**			**1,673**				

* ICCAT retention ban Rec 2021/09 active since 2022
** total mortality as stated in SCRS 2024, Table on p.269 based on a post release mortality of 34% (Bowlby *et al.*, 2021) for sharks released alive

Unfortunately, no discard data at fleet level are available for shortfin mako at IOTC. But as the gear configurations of longliners are similar in both oceans a similar ratio might be expected for the IOTC Area of Competence, further highlighting the significant potential to reduce shortfin mako mortality when banning the use of wire traces.
More than 50% of catches[12] are taken by industrial longline fleets, while the species is also caught by artisanal gillnets fisheries, while so far bycatch mitigation measures do not exist in either.

[12] IOTC–WPEB20(AS) 2024. Report of the 20th Session of the IOTC Working Party on Ecosystems and Bycatch Assessment Meeting. Seychelles and Online, 9 – 13 September 2024 FAO Fisheries Department IOTC–2024–WPEB20(AS)–R[E]: 122pp

- A TAC of 304 t provides a probability of 58.2% for the stock to be in the green quadrant in the next 10 years but requires a reduction of mortality to 10% of the 2020-2022 catches. Therefore, a TAC of 300 tons or less should be adopted and allocated the TAC between catch nations based on 2019 – 2023 catch levels and come into effect in 2026.
- As agreed by the Scientific Committee the TAC should include all species codes that most probably include shortfin mako sharks, and that the TAC should include all types of mortality, i.e. not only landings but also dead discards and include estimates for post release mortality of live releases.
- Any retention as part of the adopted TAC should only be allowed if the sharks are dead at haul back and in the presence of either an observer or a functioning EMS fulfilling the criteria for EMS as adopted by the IOTC
- Discards and the stage at discarding must be reported to the IOTC and in case of non-reporting the non-compliant CPCs should be excluded from future quota allocation.

Avoidance of Shark Bycatch and Reduction of Mortality of Threatened Sharks

Besides being a targeted species sharks are also a massive bycatch in IOTC fisheries for tuna and tuna like species in most gear and are subject to high mortality even if not retained as effective bycatch mitigation measures are absent at IOTC. Other tuna RFMOs have adopted bycatch mitigation measures to reduce mortality and implemented retention bans for several shark species in their Area of Competence to remove the economic incentives from retaining threatened sharks. IOTC has clearly lacking behind in both, the adoption of management measures for commercially targeted species and the implementation of measures to reduce on board and post release mortality of sharks that are not retained.

Silky sharks are subject to a retention ban in both, at ICCAT and WCPFC, whale sharks are prohibited from retention at WCPFC and ICCAT and all, but one species of hammerhead sharks are subject to a retention ban at ICCAT. IOTC however has so far only adopted three retention bans, for oceanic whitetip sharks, for mobulid rays, and for thresher sharks, lagging far behind other RFMOs not only in the number of species for which stock assessments are available but also lacking effective management and conservation measures for sharks. And even the few, existing retention bans at IOTC fail effective protection of these endangered or either critically endangered species as the retention bans for oceanic whitetip sharks and thresher sharks only apply to fishing vessels on the IOTC Record of Authorized Vessels, thereby exempting all coastal fleets with vessels of less than 24 m length.[13]
Threatened sharks like silky sharks and hammerhead sharks continue being targeted by several fleets with catches of more than 1000 tons of vulnerable silky sharks and critically endangered scalloped hammerhead sharks per year. Despite the retention bans about 5,000 tons of thresher sharks and around 40 tons of critically endangered oceanic whitetip sharks were reported in 2023[14], while discard reporting is widely absent in most fisheries.
At an IOTC workshop in 2024 international experts reviewed existing science on available gear modification in longline fisheries, focusing on the type of leaders and hook types, as to their impact on shark mortality. During the workshop the experts presented and discussed the outcomes of a large number of scientific papers and extensive scientific studies conducted over

[13] Iris Ziegler, IOTC lagging behind on shark conservation - an analysis of the status quo and comparison with other tuna RFMOs, IOTC-2024-WPEB20(AS)-29_Rev2, https://iotc.org/sites/default/files/documents/2024/09/IOTC-2024-WPEB20AS-29_Shark_conservation_lagging_behind_at_IOTC_rev2.pdf
[14] IOTC–WPEB20(AS) 2024. Report of the 20th Session of the IOTC Working Party on Ecosystems and Bycatch Assessment Meeting. Seychelles and Online, 9 – 13 September 2024 FAO Fisheries Department IOTC–2024–WPEB20(AS)–R[E]: 122pp

the course of and concluded from these that "*A prohibition on the use of shark lines and wire leader would likely strengthen current IOTC shark conservation measures by reducing initial capture rates (shark line prohibition) and increase escapement post capture (bite-offs from wire leader prohibition), resulting in reduced retention and likely overall mortality.*"[15] In this report the WPEB RECOMMENDED "*that based on these studies and on the basis of taking the precautionary approach, and consistent with existing SC advice on the need to reduce fishing mortality for shortfin mako, oceanic whitetip and silky shark, the that additional mitigation measures such as, but not limited to, the non-use of wire leaders and shark lines should be implemented.*"[15]
However, the WPEB full meeting later in the year failed to endorse the outcome of this workshop and the recommendations from the experts and so did the Scientific Committee in December 2024, resulting in a situation that two years after the Commission's request to the Scientific Committee to evaluate the potential benefits from a ban of wire traces in reducing the mortality of critically endangered oceanic whitetip sharks, vulnerable silky sharks, endangered shortfin mako sharks and other threatened shark species, there is still not recommendation from the Scientific Committee presented to the Commission for adoption, whereas the science is clearly there and the request for adoption of a ban on wire traces and shark lines is now submitted for the third time by concerned CPCs and supported not only by science but also by many CPCs and NGOs alike.

Therefore, such conservation measures need to be adopted now urgently to reduce shark bycatch and to reduce bycatch mortality, especially in view of the potential mortality reduction of more than 40% for oceanic whitetip sharks and more than 30% for silky sharks[16] and that the WCPFC has therefore already adopted exactly this ban as part of CMM 2024-05 as effective since January 2024. Whenever measures already exist and have proven effectiveness in other tuna RFMOs already, such measures should be adopted as a precautionary approach while studies to evaluate measures for other gear types and alternatives for future implementation should be initiated in parallel and not used as an excuse for the delay in the implementation of existing measures.

- The Commission should adopt the summary conclusion and follow the recommendations from the April 2024 longline gear workshop (held as part of the WPEB(DP) meeting) to ban shark lines and wire traces in all longline fisheries operating in the IOTC Area of Competence. In the absence of tested alternatives demonstrating equal effectiveness in the reduction of mortality for oceanic whitetip sharks, silky sharks, shortfin mako, and other threatened sharks only monofilament traces should be allowed to be used. Shark lines should be prohibited in all fisheries starting in January 2026.
- The Commission should task the WPEB and the Scientific Committee to provide clear scientific advice to the Commission on additional mortality mitigation measures for shark species that have been prioritized by the Scientific Committee to require mortality reduction and sharks that cannot be retained but also recognizing the overall need to reduce shark mortality at IOTC by improved gear selectivity.
- As proposed in IOTC-2025-S29-PropE[E] such measures should be evaluated for all gear types but gear specific advice should be developed in 2025, 2026 and 2027 for adoption in the following year, starting with gillnets in 2025, followed by purse seine and longlines.

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[15] 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 App V and App VI; https://iotc.org/sites/default/files/documents/2024/05/IOTC-2024-WPEB20DP-RE_0.pdf

[16] Bigelow Keith and Felipe Carvalho, Review of potential mitigation measures to reduce fishing-related mortality on silky and oceanic whitetip sharks (Project 101), WCPFC-SC17-2021/EB-WP-01, SCIENTIFIC COMMITTEE SEVENTEENTH REGULAR SESSION, Electronic Meeting 11-19 August 202,

- For gillnets, studies should be initiated as a priority to validate the benefits of green LED lights, which have demonstrated potential to reduce amongst other especially the bycatch of elasmobranchs and sea turtles.[17,18] The potential benefits from this technology have already been presented to the IOTC in 2022 and in 2024 the WPEB suggested the initiation of such a study.[19]
- As proposed by IOTC-2025-S29-PropT[E] whale sharks should be added to the list of species whose retention is prohibited.
- At its annual Meetings the Scientific Committee should also evaluate which other shark species fulfill criteria for a retention ban prioritizing the evaluation of critically endangered and endangered species such as scalloped hammerhead sharks, great hammerhead sharks and great white sharks, proposing them to the Commission for adoption.
- Existing exemptions from retention bans for Coastal Fisheries should be removed and limited strictly to subsistence fishing, provided that additional measures are implemented and enforced by the respective CPCs to prevent any part of these sharks from entering the international trade. Identical wording should be used for all exemptions, whether referring to existing bans or to future retention bans.
- The Commission should task the WPEB to review existing best practices for the handling and the safe release of sharks and rays including those already adopted by other tuna RFMOs[20] and propose in 2025 gear specific measures for endorsement by the Scientific Committee and adopting by the Commission in 2026.
- The Commission should also consider adopting a ban of all drift nets in the High Seas as proposed in IOTC-2025-S29-PropL[E]

Improve Reporting and Data Availability

In the absence of total mortality data for most shark species at IOTC only two shark species currently have existing stock assessments and the stock status of all other sharks and rays remains unknown, hindering the implementation of urgently needed management and conservation measures as the Commission has not applied the precautionary principle but instead had required improvements in reporting and data availability as a prerequisite. While the precautionary approach should prevail in the absence of data or conclusive science, there is an urgent need for improvement among IOTC members. As requested by scientists at least a 20% level of independent monitoring of all fishing activities is required irrespective of the gear type and the vessel size to obtain at least a minimum of reliable data, while higher coverage would of course be better especially for less frequently caught species.

- The Commission should increase the current level of 5% in a stepwise approach to at least 20% or even better 30% applying a combination of human observers and/or an EMS system fulfilling IOTC EMS criteria as laid out in Resolution 23/08 on electronic monitoring standards for IOTC fisheries.
- All at sea transshipment activities must be monitored by human observers and sharks should not be allowed being subject to any transshipment whether on large scale or smaller vessels

[17] Senko Jesse F., Peckham S. Hoyt, l Aguilar-Ramirez Danie, Wang John H., Net illumination reduces fisheries bycatch, maintains catch value, and increases operational efficiency, Current Biology, Volume 32, Issue 4, 2022, Pages 911-918.e2, ISSN 0960-9822, https://doi.org/10.1016/j.cub.2021.12.050)

[18] Allman P, Agyekumhene A, Stemle L. Gillnet illumination as an effective measure to reduce sea turtle bycatch. Conserv Biol. 2021 Jun;35(3):967-975. doi: 10.1111/cobi.13647. Epub 2020 Dec 30. PMID: 33000519.

[19] IOTC–WPEB20(AS) 2024. Report of the 20th Session of the IOTC Working Party on Ecosystems and Bycatch Assessment Meeting. Seychelles and Online, 9 – 13 September 2024 FAO Fisheries Department IOTC–2024–WPEB20(AS)–R[E]: 122pp

[20] Hutchinson Melanie, Jon Lopez and Alexandre Aires-da-Silva; BEST HANDLING AND RELEASE PRACTICE GUIDELINES FOR SHARKS IN IATTC FISHERIES ; SAC 15-11corr , IATTC 2024

and irrespective whether there is an observer on board, as there remains a high risk of non-compliance with existing and future shark conservation measures during such transshipment activities even in the presence of observers.

- Adopt a High Seas Inspection System as proposed in IOTC-2025-S29-PropG[E] to improve compliance, monitoring and surveillance with management and conservation measures and to combat IUU fishing. Such a system will benefit all CPCs and should be adopted this year after a serious of failures to do so already in the past.
- The Commission should strengthen reporting requirements for all shark catches at species level and for all gear types and fisheries (e.g. require reporting of silky sharks at species level also for gillnets and reporting of hammerhead sharks at species level for all gear)
- Require mandatory reporting of ALL discards and for ALL gear types and ALL fleets as part of the annual national reports.
- Allow reporting of shark catches and discards from developing coastal states for artisanal fleets and subsistence fisheries to be provided in a simplified method with focus on having more data even if the format isn't fully compliant with IOTC reporting standards.
- Request Commission and/or CPCs from developed nations to provide technical and financial support for capacity building for bycatch and discard reporting in developing coastal states.

Please contact:
Dr. Iris Ziegler
Head of Fisheries Policies and
Ocean Advocacy
iris.ziegler@stiftung-meeresschutz.org
What's App +49 174 3795190
www.stiftung-meeresschutz.org

Deutsche Stiftung Meeresschutz (DSM)
German Foundation for Marine Conservation
Badstr. 4 - 81379 München
Tel.: +49 8971668 88

Unter treuhänderischer Verwaltung der
Deutschen Stiftungsagentur
Brandgasse 4, 41460 Neuss