


## Statement from Deutsche Stiftung Meeresschutz (DSM) to the 30<sup>th</sup> Session of the Indian Ocean Tuna Commission, Maldives 11-15 May 2026

### One Step Forward in 2025 and Two Steps Back for Sharks in 2026?

While the IOTC has been lagging far behind other tuna RFMOs in having the smallest number of conservation and management measures adopted for sharks<sup>1</sup>, it finally may have initiated a turnaround for wide ranging shark species in the Indian Ocean, when adopting [Resolution 25/08 ON THE CONSERVATION OF SHARKS CAUGHT IN ASSOCIATION WITH FISHERIES MANAGED BY IOTC](#) at last year's Commission Meeting on La Reunion. Thereby, for the very first time in its history a multitude of comprehensive measures were adopted in parallel to strengthen the sustainable management and conservation of sharks in the Indian Ocean, many of them have experienced substantial stock declines in the Indian Ocean over the last 50+ years and are globally threatened by extinction. The comprehensive measures of Resolution 25/08 include:

1. the sustainable management of commercially targeted blue sharks including both, catch limits and quota allocation for the immediate management and the development of MSE tested Management Procedures for the mid to long term management.
2. improved conservation measures for threatened shark species targeted in several multispecies fisheries yet designated as a 'bycatch' with no catch limits or mandatory mortality reduction measures in place.
3. measures to reduce fishing related mortality for those sharks that the Commission has already designated as most vulnerable but still lacking effective bycatch avoidance or reduction (e.g. through spatial-temporal closures or gear changes/modifications) and minimum standards for best handling and release practices.

 In combination these measures lay out a pathway for sharks at IOTC that could succeed in changing the tide for sharks in the Indian Ocean and promoting IOTC from an all-time laggard to a leader in shark conservation among tuna RFMOs, if and only if, the Commission continues progressing in last year's spirit and at this year's Commission Meeting follows up on the actions defined by Resolution 25/08 for 2026 and for the following years!<sup>2</sup>

### I. For 2026 Resolution 25/08 specifically requests, that the Commission

- considers and adopts improved Minimum Standards for the Safe Handling and Release of Sharks as reviewed and recommended by the Scientific Committee by 31 December 2025.
- shall consider specific conservation and management measures for blue sharks, including a total allowable catch based on the review and the results of the 2025 blue shark stock assessment, updated reported catch information by each CPC and taking into account the IOTC Scientific Committee's advice [and including] catch limits for each CPC to be decided taking into account among other things, the most recent reported catch information.
- considers the terms of reference established by the IOTC Scientific Committee for a long term-project on sharks in the IOTC Area of Competence for collecting the data required for performing reliable stock assessments for key shark species, including those listed in paragraph 3, silky sharks, hammerhead sharks and mako sharks.
- be advised by the IOTC Scientific Committee whether whale sharks meet the definition of being a taxon of the greatest biological vulnerability and conservation concern for which there are very few data [and] should this be the case on the appropriateness of applying precautionary management measures in IOTC fisheries, including a retention ban, [as well as on] options for future research and data collection [and] other mitigation measures for relevant IOTC fisheries.

<sup>1</sup> IOTC-2025-WPEB21(AS)-25; Iris Ziegler; Resolution 2025-08, an opportunity to step up science driven conservation and management measures for sharks in tuna and multi-species fisheries at IOTC?

<sup>2</sup> IOTC-2024-WPEB20(AS)-29\_Rev2; Iris Ziegler; Resolution 2025-08, an opportunity to step up science driven conservation and management measures for sharks in tuna and multi-species fisheries at IOTC?



In addition to these deliverables for 2026, Resolution 25/08 also tasks the IOTC Scientific Committee to

- advise on the population status of relevant sharks, on their vulnerability to overfishing, and on whether precautionary management of these species, through the application of specific measures such as a retention ban is recommended.
- continue the development of a management strategy evaluation framework for Indian Ocean blue shark, to present potential harvest control rules, and associated candidate limit, target and threshold reference points to the Commission.

**We recall and highly welcome that at its 29th Session in 2025 the Scientific Committee has followed up on its mandate laid out by Resolution 25/08 and has delivered the requested shark related recommendations for consideration and adoption by the Commission at its 30th Session in 2026.**

**HOWEVER**, despite the clear provisions set out by Resolution 25/08 and the Recommendations from the Scientific Committee only Japan has submitted a proposal related to Res 25/08, [IOTC-2026-S30-PropN - ON THE CONSERVATION OF SHARKS CAUGHT IN ASSOCIATION WITH FISHERIES MANAGED BY IOTC \(CF. RES 25/08\) \(JPN\)](#).

We welcome this step taken by Japan diligently following up on the provisions set out by Resolution 25/08 to be considered by the Commission in 2026, but unfortunately, Proposal N in its current version considers NONE of the recommendations made by the SC on sharks and thereby, if adopted as proposed, will NOT translate into the required next steps for strengthening the management and conservation of sharks at IOTC. Instead, adopting it as submitted this would show IOTC taking at least two steps back, respectively two years from the mission laid out by Resolution 25/08. A similar backward orientation has unfortunately also happened to other shark measures in the past, e.g. as defined in Paragraph 8 of [Res 18/02](#).

**Deutsche Stiftung Meeresschutz thus urges the Commission NOT to step back again and NOT to miss this opportunity for sharks at IOTC, BUT to allocate sufficient time during this year's Commission Meeting to thoroughly consider and discuss all the laid-out provisions of Res 25/08, taking into account the recommendations of the Scientific Committee.**

**An updated version of PropN including all the recommendations from the SC should be jointly developed by the CPCs during the meeting and adopted by the Commission in 2026 and come into effect in January 2027.**

**ADDITIONALLY**, Resolution 25/08 requests that 'at least one CPC will undertake scientific fishing trials to assess the effects of leader materials on the mortality of vulnerable shark species (including oceanic whitetip shark, silky shark, shortfin mako and thresher sharks) and blue sharks [and that] such trials must be conducted, concluded, presented to the IOTC Scientific Committee by SC30.

The change proposed in PropN in its current version to this study objective, has most probably been made due to a linguistic misinterpretation of the text as written in Resolution 25/08, that any non-native speaker might be prone to make. As written in Res 25/08 the study protocol clearly indicates that both, **vulnerable sharks and blue sharks** (yet not designating blue sharks as a vulnerable species) are to be included in the study and the impact of both gear modifications on the mortality of both, vulnerable sharks (oceanic whitetip shark, silky shark, shortfin mako, and thresher sharks) **and** blue sharks is to be assessed.

**Deutsche Stiftung Meeresschutz requests the Commission to maintain the text on the objective of the study as set out by Res 25/08. This is important to ensure that the outcomes comply with the objective of the study, i.e. to investigate whether "the use of wire leaders has a higher catch and mortality for the vulnerable and target shark species (both in total and by species) than does use of nylon monofilament leaders."**

## II. Deutsche Stiftung Meeresschutz urges the Commission to update PropN and adopt a Resolution on the Conservation of Sharks caught in Association with Fisheries managed by IOTC (CF. RES 25/08) including the following measures recommended by the Scientific Committee

**II.1. Update Paragraph 24 in line with the SC recommendation to update the Minimum Standards for Best Handling and Release Practices (BHRPs)<sup>3</sup> by revision of Annex III of Resolution 25/08 with WPEB the updated Minimum Standard outlined in APPENDIX XXVII of the 2025 WPEB report<sup>4</sup>.**

The Working Party on Ecosystem and Bycatch has reviewed and compiled BHRPs in 2025 and produced Minimum Standards for Safe Handling and Live Release Procedures with the aim to ensure the highest level of survival of sharks and that, whenever possible, prompt, and effective action will be taken to return the shark to the sea. BHRPs are divided by gear type and include specific handling practices for whale sharks in purse seine fisheries as requested by Res. 25/08.

The SC RECOMMENDED that the Commission consider these standards for adoption in 2026.

**II.2. Update Paragraph 31 that all “interactions with sharks related to paragraphs 3, 15, 22 and 28 are duly recorded [...] in accordance with Resolutions 15/01 *On the recording of catch and effort data by fishing vessels in the IOTC area of competence*” ..... by including the recommendation from the Scientific Committee<sup>5</sup> that the following shark species also require at species level reporting.**

This updated species list should also be included into Resolution 15/01 at the Commission Meeting in 2027.

- Silky sharks to be added also for gillnets fisheries;
- Hammerhead sharks to be reported at species level at least for scalloped, smooth and great hammerhead sharks for all gear types (explicitly including purse seine fisheries);
- Mantas and devil rays to be reported at species level differentiating at least between manta rays (giant manta and reef manta) and other devil rays adding them for mandatory reporting at least for purse seine fisheries and for gillnet fisheries instead of optional;
- Great white sharks as mandatory for all gear types;
- Oceanic whitetip sharks as mandatory for all gear types.

**II.3. Update Paragraph 26 to include (a) a total allowable catch taking into account the IOTC Scientific Committee’s advice and taking a precautionary approach by adopting in 2026 a catch limit at the lower end of the 95% Confidence Interval of MSY as an ad interim TAC until a MSE tested management procedure can be adopted, which the Scientific Committee believes will resolve the current uncertainties.**

In its 29<sup>th</sup> Session the SC recommended that there “is no increase in fishing pressure until such uncertainties are resolved”<sup>6</sup> cautioning that “the current MSY catch estimates from the assessment model are based on nominal reported catch (which are currently under revision and likely under-reported based on sharks not reported to species) and secondly, key uncertainties in other model inputs and parameters”.<sup>7</sup> Although the 2025 blue shark stock assessment concluded the stock not to be overfished nor subject to overfishing, the assessment also noted that current catches are close to the estimated MSY and that “significant increases could result in decreasing biomass and the stock becoming subject to overfishing in the future”<sup>8</sup> and that total catch should thus stay below the MSY of 31,000 t (95% C.I. = 21,790 – 39,840 t).

**(b) agree on preliminary catch limits for each CPC based on the most recent reported catch information thereby incentivising CPCs that have not reported their catches in the past to start reporting them in order to be included into the allocation table. This is a unique opportunity arising from the substantially higher estimated catch used for the stock assessment and MSY estimation in comparison to actually reported catches.**

The SC species summary totals an average reported catch of blue shark of 9,463 metric tonnes for the time period between 2020 and 2024, of which the majority of catches have been reported by Taiwan, China (29.8%) EU, Spain)

<sup>3</sup> SC Report IOTC-2025-SC28-R para 120; Page 47 of 269; IOTC-2025-WPEB21(AS)-R[E] APPENDIX XXVII SUGGESTED REVISION TO ANNEX III OF RESOLUTION 25/08 (THE LIVE RELEASE HANDLING PROCEDURES FOR SHARKS)

<sup>4</sup> IOTC-2025-WPEB21(AS)-R[E] APPENDIX XXVII SUGGESTED REVISION TO ANNEX III OF RESOLUTION 25/08 (THE LIVE RELEASE HANDLING PROCEDURES FOR SHARKS; MINIMUM STANDARDS FOR SAFE HANDLING AND LIVE RELEASE PROCEDURES)

<sup>5</sup> IOTC-2025-SC28-R SC28.14 (para. 118)/ page 266.

<sup>6</sup> SC Report IOTC-2025-SC28-R APPENDIX 23 EXECUTIVE SUMMARY: BLUE SHARK (2025); Page 178 of 269

<sup>7</sup> SC Report IOTC-2025-SC28-R APPENDIX 23 EXECUTIVE SUMMARY: BLUE SHARK (2025); Page 178 of 269

<sup>8</sup> IOTC-2025-WPEB21(AS)-R[E] p 13 of 147



(29.5%) and Indonesia (17.8%) whereas the 15 other fleets with reported blue shark catches contributed to 22.9% of the total catch in recent years;<sup>9</sup> Therefore, all CPCs that have reported catches in the past could receive a catch quota based on these leaving a buffer for those CPCs that have previously not reported blue shark catches but have been contributing to the 25,877 metric tonnes of average estimated catch between 2021 – 2023 used as a catch estimate for the stock assessment.<sup>10</sup> By allowing such CPCs to be included into the allocation table in the future, once reporting catches that exceed e.g. 500 mt, will provide an incentive to improve reporting of blue shark catches at species level within the agreed TAC without those CPCs that have already reported their catches in the past having to decrease their quota. Thereby, such a catch allocation for each CPCs could act as a strong incentive to improve compliance with reporting requirements and the availability of better data for future stock assessments as requested by Res 25/08 the Scientific Committee should endeavour and the SC also confirmed requires improvement, especially with respect to overall catch and discard reporting.<sup>11</sup>

**II.4. Update Paragraph 17 to include the reference to the recommendation of the Scientific Committee on the criteria for the study protocol<sup>12</sup>. For future reference the details for the study protocol as adopted by the SC should also be added as a new Annex to Resolution 25/08.**

In accordance with Paragraph 17 of Resolution 25/08 concerning principles for conducting experimental fishing trials, the SC AGREED the criteria specified below and that trials should employ a "paired comparison" approach, by alternating the control (nylon monofilament) and experimental (wire) leaders.

Those criteria present the basic requirement for ensuring a fishing trial to obtain results trustworthy for scientific analyses.

- Select the areas and seasons with known high shark abundance (including of vulnerable shark species), based on existing data from Indian Ocean Regional Observer Scheme (ROS), research and surveys.
- Before the trial, conduct a power analysis (following Watson et al. 2005) informed by historical Indian Ocean bycatch data to determine the number of sets required to detect a true effect (for each vulnerable pelagic shark species, not including blue shark), thereby avoiding a Type II error.
- Standardise (and record) gear and operational practices during the trials, including, inter alia, setting/hauling times, bait type, hook types, line weighting and branch line/leader lengths and diameter and other gear configurations (e.g. use of lightsticks) to assist the trial in isolating the effect of leader material. Record any variations from standardised gear/practices, if they occur.
- Use at least one independent observer or scientific researchers who are trained in longline operations and species identification to minimise human error and observational bias. If using observers, the observers should be debriefed post trip to discuss/document any variations from the planned design.
- Collect data for each branchline at least on size and species of individual catch, their fate (retained/discarded) and condition at haulback, and the occurrence of bite-offs (as much as possible), together with corresponding leader material.
- Brief the trial vessel skipper, crew(s) and observer(s) on the trial's objectives and design, and the experimental protocols prior to the fishing trial to ensure their understanding and support to the trial.
- Apply the appropriate statistical analysis, including hierarchical or mixed-effect models to evaluate potential differences in CPUE, bite-off rate, sizes and haulback mortality rate according to different leader materials in use.

**II.5. Retain Paragraph 3 and delete Paragraphs 43 and 45 to ensure whale sharks are subject to a retention ban following the classification of the species by the SC as a taxon of the greatest biological vulnerability and conservation concern for which there are very few data and that this classification supports the consideration of precautionary management measures. The SC RECOMMENDED that the Commission take appropriate action based on this classification.<sup>13</sup>**

Based on this classification and the SC recommendation the Commission should consider the vulnerability of this species which is already prohibited to retain at WCPFC and ICCAT, a species listed on App I of CMS and has recently been moved from CITES App II to App I. In line with these international regulations all signatories and

<sup>9</sup> SC Report IOTC-2025-SC28-R APPENDIX 23 EXECUTIVE SUMMARY: BLUE SHARK (2025); p 178 of 269

<sup>10</sup> SC Report IOTC-2025-SC28-R APPENDIX 23 EXECUTIVE SUMMARY: BLUE SHARK (2025); p 178 of 269

<sup>11</sup> SC Report IOTC-2025-SC28-R APPENDIX 23 EXECUTIVE SUMMARY: BLUE SHARK (2025); p 177 of 269

<sup>12</sup> SC Report IOTC-2025-SC28-R Para 151

<sup>13</sup> SC Report IOTC-2025-SC28-R para 123; Page 47 of 269



range states to CMS are prohibited to catch and retain the species and all parties to CITES have banned all international trade of the species. As many CPCs at IOTC are also bound by these international treaties confirming the retention ban for whale sharks as foreseen by Res 25/08 at this year's Commission is consequential and should no longer be delayed.

**II.6. In addition, update Paragraph 27 adding a timeline for the development and adoption of a Management Procedure for blue sharks by 2027 and agree on Management Objectives to support continuation of the development of MSE-tested MPs for blue sharks and guide its development.**

Such Management Objectives should build on recently adopted objectives for other species respectively the recently proposed<sup>14</sup> objectives for blue shark at ICCAT, aiming for the long-term sustainable management of the stock.

### III. Deutsche Stiftung Meeresschutz's Evaluation and Recommendations on other Proposals tabled for the 30th Session of the Commission

With regard to other proposals submitted to the Commission we support the adoption of [PropJ](#) on swordfish, [PropO](#) on HSBI, and [PropQ](#) on the High Seas Treaty. However, we also consider several other proposals as important for the sustainable management and conservation of shark and ray populations in the IOTC area of competence and therefore also wanted to share our opinion on these with the Commission.

#### III.1 [IOTC-2026-S30-PropC ON THE CONSERVATION OF MOBULID RAYS CAUGHT IN ASSOCIATION WITH FISHERIES IN THE IOTC AREA OF COMPETENCE \(CF, RES 19/03\) \(EU\)](#) and [IOTC-2026-S30-PropK - ON THE CONSERVATION OF MOBULID RAYS CAUGHT IN ASSOCIATION WITH FISHERIES MANAGED BY IOTC \(CF. RES 19/03\) \(MDV\)](#)

In Paragraph 128 the SC28 recommended that the Commission consider the revised handling guidelines for mobulids as developed by and summarised in Appendix XXVI of the WPEB report for adoption in 2026. Two CPCs have in response submitted proposals updating Resolution 19/03 to include these Minimum Standards for Safe Handling and Live Release Procedures for different gear types, a long-time overdue measure to reduce the mortality of incidentally caught mobulids. However, while PropC only includes the updated Annex and deletes the derogation on local consumption that had already expired in 2022, PropK modernises Resolution 19/03 in line with Resolution 25/08, thereby harmonising the approach taken for the conservation of vulnerable elasmobranchs.

Deutsche Stiftung Meeresschutz therefore, proposes both proponents to work together and provide a joint proposal for discussion by the Commission based on the approach set out by PropK but also reviewing the proposed text on exemptions for artisanal and subsistence fisheries, which should ideally be eliminated, or at least further restricted to subsistence fisheries and consumption by the fishermen and his family only in line with the FAO definition of subsistence. All mobulidae should be subject to a retention ban applicable to all fisheries, as such exemptions are difficult if not impossible to control effectively and also reduces the overall effectiveness of the mortality reduction measures described in the Annex of the Resolution.

#### III.2. [IOTC-2026-S30-PropB ON THE PROHIBITION TO USE DRIFTNETS \(CF. RES 17/07\) \(EU\)](#)

As gillnets are generally associated with high rates of bycatch of elasmobranch and other ETP species and associated high mortalities there is an urgent need of effective bycatch mitigation measures and a stepwise reduction of their use throughout the complete IOTC Area of Competence. So far Resolution 17/07 only prohibits the use of large-scale driftnets of more than 2.5 km in length in the High Seas while their use is still allowed in the EEZs within the IOTC Area of Competence, although such large-scale nets are known to drift into the High Seas.

Deutsche Stiftung Meeresschutz welcomes the proposal's intent to reduce the negative impacts of driftnets on the ecosystem of the Indian Ocean, but we also highlight that in its proposed version the proposal will only apply to vessels on the IOTC Record of Authorised Vessels thereby substantially reducing its potential impact as many vessels are thereby exempt.

<sup>14</sup> ICCAT Proposal PA4-813/2025 'On operational management objectives for Atlantic blue shark'



In addition, we remind the Commission that banning large scale driftnets is not enough but the implementation of effective bycatch avoidance measures for all driftnets must be prioritised. Indeed, the WPEB has repeatedly suggested that studies are carried out to validate the findings of studies (e.g. Senko et al., 2022; Allman et al., 2021)<sup>15</sup>, suggesting significant reduction of elasmobranch and other ETP species bycatch can be achieved when installing green LED lights on gillnets. Studies trialling gillnet mitigation measures such as: LED lights, sub-surface setting ...were included for 2026 and 2027 in the WPEB's list of priority topics, however, no timeline for the WPEB preparing a study protocol, conducting the study, and reporting the results and recommendations derived from the results to the Scientific Committee and for adoption by the Commission has so far been agreed on. This should be included as a mandate into the proposal aiming for adoption of a study outline in 2026 and adoption of recommendations by the Commission based on the study outcomes in 2028.

### III.3. IOTC-2026-S30-PropD - CONCERNING THE IOTC RECORD OF VESSELS AUTHORISED TO OPERATE IN THE IOTC AREA OF COMPETENCE (CF. RES 19/04) (EU)

Deutsche Stiftung Meeresschutz welcomes the intent of this proposal to require all vessels of 12 m or more to be included into the IOTC's Record of Authorised Vessels (RAV) and thereby increasing monitoring, transparency, data reporting, as well as the effectiveness of adopted management and conservation measures, as many of these only apply to vessels in the RAV and therefore exempt vessels of less than 24 m fishing only in the EEZ. This exemption of a large number of vessels fishing for IOTC species in the IOTC area of competence is therefore substantially weakening many of the existing Resolutions, hinders data reporting and prevents effectively combating IUU. As the proposed measure provides a transition period until 2028 it also acknowledges that implementation at Coastal States may take some time to accomplish.

### III.4. IOTC-2026-S30-PropL - ON MANDATORY STATISTICAL REPORTING REQUIREMENTS FOR IOTC CONTRACTING PARTIES AND COOPERATING NON-CONTRACTING PARTIES (CPCS). (CF. RES 15/02) (MDV)

Deutsche Stiftung Meeresschutz supports the increased transparency on catch reporting clearly differentiating between catches made in the EEZs and the High Seas and also identifying if catches are made in EEZ of other CPCs to improve the resolution of catch efforts. We also appreciate the intent on the annual reporting of statistics on fishing vessels.

However, the suggested definitions fall short to identify and clearly differentiate between different fishing gear and fleets.

Continuing to refer to Coastal fisheries as those other than longline or surface fisheries and failing to offer a clear definition based on vessel size and/or other traceable vessel statistics that would deem a fishing vessel to qualify as "Coastal" respectively "artisanal", should be reviewed and updated as this provides a massive gap exempting many vessels from the existing or future improved reporting requirements. If trying to close this gap an appropriate definition as offered in a recent scientific paper on the definition of small-scale fisheries<sup>16</sup> should be included.

Also, the reporting of sharks and shark discards in line with the requirements of Res15/02 has continued being a severe shortcoming at IOTC hindering reliable information on total mortality for stock assessments and the adoption of additional conservation measures, as no discard data has been reported to the Secretariat for use in the annual catch summaries.

We further remind the Commission and the Scientific Committee that many CPCs also don't report multiannual trends on shark interactions and shark discards by their fleets as part of their National Reports submitted to the Scientific Committee. And even for large purse seine vessels only the EU fleets<sup>17</sup> have so far reported their annual discards and the status at discard of silky sharks and other sharks.

<sup>15</sup> WPEB report: [https://iotc.org/sites/default/files/documents/2025/01/IOTC-2024-WPEB20AS-R\\_F\\_rev1.pdf](https://iotc.org/sites/default/files/documents/2025/01/IOTC-2024-WPEB20AS-R_F_rev1.pdf)

<sup>16</sup> Bianca Haas et Umair Shahid: Is small really small? Re-characterising tuna fisheries in the Indian Ocean; *Journal of Environmental Management* 400 (2026) 128717

<sup>17</sup> IOTC-2025-SC28-NR06 EUROPEAN UNION REPORT FOR THE SCIENTIFIC COMMITTEE OF THE INDIAN OCEAN TUNA COMMISSION, 2025 (2024 DATA)



#### IV. Additional topics for sharks the Commission, the Compliance Committee, and the Scientific Committee should address in line with the provisions of Res 25/08 beyond the 30<sup>th</sup> Session of the Commission

##### IV.1. Fins naturally attached (FNA) policy for sharks

While appreciating the decision to allow only one out of two possible alternatives to be selected by each CPC and the requirement that CPCs provide annual data in their compliance questionnaire (on enforcement difficulties, the number of vessels applying the alternative measures, how compliance is enforced, etc.) we continue questioning the effectiveness of the allowed alternatives under Resolution 25/08 in preventing finning from happening.

Deutsche Stiftung Meeresschutz calls to the **Compliance Committee** to diligently review all requested data annually and immediately apply the provision laid out by Res 25/08 in case of non-compliance with reporting requirements, that such CPC will no longer be eligible to use the alternative measures and having to comply with Fins Naturally Attached. In this context we also encourage all CPCs to review whether the selection of an alternative as made by September 2025 should still be applicable or whether it can now commit to Fins Naturally attached for all sharks landed, regardless whether landed fresh or frozen without exceptions.

##### IV.2. Shortfin Mako sharks (SMA, LMA, MAK)

Although the stock assessment in 2024 had concluded that shortfin mako is overfished and experiencing overfishing with projections from the stock assessment showing that at a reduction of total mortality to 300 tonnes or less (including all types of mortality i.e. landings, dead discards and post release mortality) would be needed to provide at least a close to 60% probability for rebuilding the stock into the green quadrant of the Kobe plot within the next 10 years. And while the SC had recommended that future catches should not exceed 40% of current levels to provide at least a 50% probability for recovery<sup>18</sup> Res 25/09 adopted in 2025 denies the stock any catch limits to reduce mortality as it requires fleets merely to release live shortfin makos and retaining dead individuals only when a human observer or functioning EMS is on board.

Deutsche Stiftung Meeresschutz reminds the **Commission** that also mako sharks together with silky sharks, thresher sharks, whale sharks, oceanic whitetip sharks and hammerhead sharks are explicitly identified by Resolution 25/08 as being in need of effective mortality reduction, further scientific advice, and improved reporting compliance.

While reminding the **Compliance Committee** to strictly monitor compliance with the requirements laid out in Res 25/09 we warn that these measures are highly likely to not being sufficient to achieve the required mortality reduction that allows the stock to start recovering and we therefore urgently request the **Commission** not to wait until 2028 before reviewing the effectiveness of the agreed measures but to revisit these already in 2027.

##### IV.3 Incidental catches and interactions with threatened hammerhead sharks and other threatened sharks

IOTC fisheries interact with several ETP species due to overlapping habitats that in the absence of species- and gear-specific mitigation measures continue experiencing unmitigated high mortality despite their stock status being either known to be overfished as for shortfin mako sharks or completely unknown as for silky sharks, and hammerhead sharks as well as many other threatened sharks and rays that are caught and often retained by IOTC fisheries as neither subject to a retention ban or size, seasonal or areal limits.

In 2025 the SC noted “that there are vulnerable species in addition to threshers and oceanic whitetip sharks which would benefit from strong management measures including shortfin mako shark (which the 2024 assessment indicated is overfished and subject to overfishing) and silky shark (for which the IOTC ERA indicated they are at least as vulnerable to IOTC fishery impacts as species already subject to retention bans).”<sup>19</sup>

We particularly remind the Commission that all nine species of hammerhead sharks are classified as either “Critically Endangered” (six), “Endangered” (one), or “Vulnerable” (one) by the IUCN with all assessed species showing a globally decreasing trend in populations<sup>20</sup> despite many of them having been listed on CITES App II

<sup>18</sup> SC Report IOTC-2025-SC28-R APPENDIX 26 EXECUTIVE SUMMARY: SHORTFIN MAKO SHARK (2025) Page 190 of 269

<sup>19</sup> SC Report IOTC-2025-SC28-R Para 160; p 51 of 269

<sup>20</sup> <https://www.iucnredlist.org/search?query=Hammerhead%20shark&searchType=species>



since September 2014 after the adoption of the listing proposal at the CITES CoP in 2013. Carolina Hammerhead (*Sphyrna gilberti*) is classified as “Data Deficient” with an unknown population status but is the only hammerhead species not occurring in the Indian Ocean.

Hammerhead sharks are globally considered to be among the most vulnerable species, with specifically scalloped hammerhead sharks having been subject to declines of more than 80% in all oceans and an estimated median reduction of 93.4% over three generation lengths (72.3 years) in the Indian Ocean, with the highest probability of >80% reduction over three generation lengths and therefore listed as critically endangered with a declining trend (IUCN Red List of Threatened Species 2025-2). Reported catch of scalloped hammerheads at IOTC exceeded 1000 t in 2024 although most fisheries don’t report them at species level. The stock status at IOTC is unknown and the SC has repeatedly advised that “the Commission should consider taking a cautious approach by implementing some management actions.”<sup>21</sup>

ICCAT has banned the retention of all species of the family of Sphyrnidae except for *Sphyrna tiburo* already since 2011 and several CPCs including but not limited to the European Union have also banned the retention of incidentally caught hammerhead sharks in all their waters<sup>22</sup>.

While *Sphyrna tiburo* had at the time of adoption of ICCAT Rec 10-08<sup>23</sup> still been classified by IUCN as “Least Concern”<sup>24</sup> based on the assessment in 2016, the species is since the latest assessment in 2020 classified as “Endangered”<sup>25</sup>

*Sphyrna mokkaran* and *Sphyrna lewini* have recently be added to App I of CMS and all species of hammerheads are subject to NDF requirements in line with CITES App II listing.

Because of their vulnerability to overfishing and the high value of their fins in the international fin trade hammerhead sharks are among the most endangered shark species. While adults are caught by several IOTC fisheries, juveniles are heavily exploited by inshore fisheries in their shallow coastal nursery grounds.

Deutsche Stiftung Meeresschutz in line with the mandate set out by Res 25/08 calls for the **Scientific Committee** to review other sharks whether they qualify as species of the greatest biological vulnerability and conservation concern for which there are very few data and specific conservation measures needed we encourage the Commission to task the Scientific Committee to perform such review for all species of hammerheads occurring within the IOTC Area of Competence and to recommend specific conservation measures for the Commission to consider at its meeting in 2027, including but not limited including those species of the genus *Sphyrnidae* to the list of shark species, in Para 3 of Resolution 25/08, which are prohibited to retain on board, transship, land and store any part or whole carcass.

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<sup>21</sup> SC Report IOTC-2025-SC28-R APPENDIX 25 EXECUTIVE SUMMARY: SCALLOPED HAMMERHEAD SHARK (2025)

<sup>22</sup> <https://www.boe.es/boe/dias/2009/10/05/pdfs/BOE-A-2009-15857.pdf>

<sup>23</sup> [https://www.iccat.int/Documents/Recs/COMPENDIUM\\_ACTIVE\\_ENG.pdf](https://www.iccat.int/Documents/Recs/COMPENDIUM_ACTIVE_ENG.pdf)

<sup>24</sup> Cortés, E., Lowry, D., Bethea, D. & Lowe, C.G. 2016. *Sphyrna tiburo*. The IUCN Red List of Threatened Species 2016: e.T39387A2921446. <https://dx.doi.org/10.2305/IUCN.UK.2016-2.RLTS.T39387A2921446.en>. Accessed on 17 January 2026.

<sup>25</sup> Pollom, R., et al.; 2020. *Sphyrna tiburo*. The IUCN Red List of Threatened Species 2020: e.T39387A124409680. <https://dx.doi.org/10.2305/IUCN.UK.2020-3.RLTS.T39387A124409680.en>.