

Recommendations for the 33rd Meeting of the Convention on International Trade in Endangered Species Animals Committee (AC33)



Hammerhead sharks. © Shutterstock

FACT SHEET

INTRODUCTION

Sharks and rays (elasmobranchs) are exceptionally threatened, primarily by overfishing. International trade in shark and ray products is a key driver of population depletion around the world. While significant strides toward shark conservation have been made in recent decades through wildlife and fisheries treaties, the perception of these species as both commodities and wildlife has led to misalignment in governments' approaches to fulfilling obligations. Despite a rising profile at CITES, elasmobranchs remain a relatively low priority for fisheries bodies. Fisheries management,

however, is essential to proper implementation of CITES listings for elasmobranchs. CITES improvements can in turn inform fisheries bodies' management efforts, particularly regarding compliance with elasmobranch safeguards.

We welcome the continuation of CITES groundbreaking [Review of Significant Trade \(RST\)](#) for sharks and rays, while noting that serious inadequacies in reporting and curbing elasmobranch exploitation extend far beyond the species/country combinations identified in this process and also warrant immediate attention.

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GAP ANALYSIS

The 2023 Shark League report, *Bridging Gaps that Hinder Shark Conservation: An analysis of ICCAT Parties' policies for CITES-listed Atlantic elasmobranchs*¹, examines the implementation of conservation obligations for various Atlantic elasmobranch species by Parties and Cooperators (CPCs) to the International Commission for Conservation of Atlantic Tunas (ICCAT). The analysis explores problematic gaps between commitments and compliance, specifically regarding:

- CITES and ICCAT protections (through reservations and exceptions)
- Nations' species-specific reporting of trade, landings, discards, and regulations
- Transparency associated with essential exploitation statistics
- Environmental and fisheries authorities' policy work.

Key Findings re: Atlantic Elasmobranchs

Lack of elasmobranch trade and fishing data from governments is a primary and persistent hurdle to assessment, compliance, and conservation. The CITES database does not yet present a full picture of global elasmobranch trade; the lack of pelagic shark data reveals a particular problem with implementing “introduction from the sea” provisions.

Of the 52 ICCAT CPCs:

- Most lack and/or fail to report on domestic regulations to implement ICCAT shark measures
- 13 report commercial trade in CITES-listed sharks without a public non-detriment finding (NDF)
- Only six report more than 100t of elasmobranch discards over the last decade, despite many ICCAT bans on retaining various shark species
- Most – including five that rank in the top ten for ICCAT shark landings – report no elasmobranch discards at all.



Oceanic manta ray. © Francesca Reina/Shutterstock

Potential for CITES to Enhance ICCAT Conservation Efforts

The reporting of shark and ray exports only by country, not ocean region, makes it difficult to use international fisheries measures (which vary across the globe) to evaluate the legality of fishing operations from which elasmobranch products originate.

For example, ICCAT's **silky shark** (*Carcharhinus falciformis*) measure allows retention only by developing CPCs, on the condition that they report and try not to increase landings while also preventing international trade. There are no comparable measures for Eastern Pacific fisheries. As such, amending CITES reporting guidance to elicit the ocean basin or FAO fishing area source of exports could not only result in valuable trade data, but also help to determine if ICCAT CPCs with substantial exports of silky shark — particularly **Costa Rica** and **Nicaragua** — are violating ICCAT's measure for the species.

ICCAT has a broader, simpler retention bans for exceptionally vulnerable **bigeye thresher** (*Alopias superciliosus*) sharks, granting only Mexico an allotment. Both **Mexico** and **Senegal** have been identified by CITES for sharp increases in bigeye thresher exports; neither report landings of this species to ICCAT. More detailed trade reporting could help confirm that **Mexico's** exports are sourced from the Pacific, where the species is not prohibited, while shedding light on the source of **Senegal's** trade.

¹ Fordham, S.V., Hood, A.R., Arnold, S.J., Kachelriess, D., and Lawson, J.M. 2023. *Bridging the Gaps that Hinder Shark Conservation: An analysis of ICCAT Parties' policies for CITES-listed Atlantic elasmobranchs*. The Shark League. London.

Similarly, export reporting improvements could help identify the fisheries responsible for **Mexico's** reported landings of **oceanic whitetip sharks** (*Carcharhinus longimanus*), the only species that is subject to complete bans on retention under all four major tuna-focused Regional Fishery Management Organizations (RFMOs).

In all of these cases, evidence of specific, protective fishery regulations is also imperative for documenting compliance.

An ICCAT measure to ban retention and promote safe release of **manta** and **devil rays** (*Mobula spp.*) is pending, but improved data can help reduce particular uncertainty about the exploitation of these exceptionally vulnerable species that has stemmed in large part from catch-all landings and trade reporting.

In its gap analysis, the Shark League generally urges governments to:

- Improve the integration of marine fisheries and environmental agency activities
- Strive for greater transparency and accountability with respect to treaty implementation
- Submit accurate, complete, timely fisheries and trade data to relevant authorities
- Request / facilitate technical and financial assistance for low-capacity countries, and
- Promote complementary actions under other international conservation treaties.

FOCUS ON CITES AC33

Recent analyses prepared for this CITES AC meeting, including those by NGOs, indicate:

- Alarming levels of trade in Endangered and Critically Endangered elasmobranch species that is not adequately reflected in the CITES database
- An abundance of mismatched trade records that likely result from under-reporting, mis-labeling, and masking of illegal activity
- A serious lack of NDFs, legal acquisition findings, and science-based limits required for sustainable exploitation of elasmobranchs
- Domestic management by the Parties identified for the shark and ray RST, in particular, that is insufficient to justify trading such large volumes of highly threatened species.

PRIORITY ACTIONS



The Shark League joins other NGOs in calling on the Animals Committee to immediately agree:

- Continued (stage 2) scrutiny of all 14 elasmobranch/country combinations selected at AC32 for RST
- Further examination of these combinations (similar to that given to Ecuador's shark trade under Article XIII) to ensure the application of concrete limits on catch and trade
- Zero annual commercial quotas for listed shark and ray species until Parties demonstrate fishing and trade restrictions sufficient to ensure sustainability
- A Standing Committee review of Parties' compliance with RFMO shark and ray retention bans as well as Convention on Migratory Species (CMS) Appendix I listings, particularly with respect to Critically Endangered oceanic whitetip sharks
- A new requirement that Parties report shark and ray trade by ocean basin or FAO fishing area and jurisdiction to reveal the source of removals and facilitate compliance monitoring.



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FACT SHEET**More generally, CITES Parties and the Secretariat should collaborate to ensure:**

- Reporting of:
 - Shark and ray catches to the species level as landings and discards (including individuals' fate)
 - Shark and ray trade in weight (not number of specimens), in line with CITES guidelines
 - *Introduction from the Sea* information, in line with CITES requirements
- Prompt resolution of CITES database mismatches
- Traceability along shark and ray product supply chains.

Parties are encouraged to also consider:

- Posting non-detriment findings to the CITES website
- Retracting any reservations on shark and ray listings
- Proposing CITES measures for skate, dogfish, and deep-sea shark species in trade.



Oceanic whitetip shark. © Alexander Vasenin

The Shark League of the Atlantic and Mediterranean was formed with support from the Shark Conservation Fund to advance responsible regional shark and ray conservation policies. Shark Advocates International, Ecology Action Centre, Shark Trust, and PADI AWARE Foundation are the coalition's founding members.

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