



October 7, 2020

Andrew Lawler
Deputy Assistant Secretary for International Fisheries
National Oceanic and Atmospheric Administration
1315 East-West Highway
Silver Spring, Maryland 20910

Dear Mr. Lawler:

We write with urgency to request that the United States change course and actively support immediate protection for seriously overfished North Atlantic shortfin mako sharks (*Isurus oxyrinchus*) through upcoming annual negotiations of the International Commission for Conservation of Atlantic Tunas (ICCAT).

The particularly vulnerable and valuable shortfin mako shark is a species of global conservation concern. Last year, the species was classified as Endangered on the International Union for the Conservation of Nature (IUCN) Red List and added to Appendix II of the Convention on International Trade in Endangered Species (CITES). As you know, ICCAT scientists recently reiterated their 2017 advice to completely ban retention for the exceptionally depleted North Atlantic population. ICCAT's failure to take this action is delaying the start of a recovery period that already spans five decades while exacerbating the risk for irreparable collapse.

We were troubled that the U.S. opposed the 2019 ICCAT proposal from 10 other Parties to heed the shortfin mako scientific advice. The ensuing failure to reach consensus left the species woefully under-protected. COVID-19 has further delayed mako management but has not stopped mako overfishing.

We stress that removing all incentive to catch makos is key to achieving the mortality reduction needed to turn the tide. Allowances to land dead makos create incentives for irresponsible fishing practices. Retention bans, on the other hand, shift the incentive to avoidance.

We respectfully remind you that NOAA has prohibited retention of roughly 20 Atlantic shark species (with some notable success) and that prohibition is by far the most common measure that ICCAT has taken for sharks. ICCAT scientists have highlighted shortfin makos' 77% post release survival potential to convey that a retention ban stands a good chance of being effective at protecting this species. Some makos will unfortunately be discarded dead under any scenario. We find concern over this fact understandable but insufficient to justify rejection of the advice.

In summary, ICCAT scientists have warned fishery managers about the vulnerability of mako sharks for more than a decade and have delivered the same, exceptionally clear scientific advice for the North Atlantic for four years straight. The state of the population is dire and continues to deteriorate. There is scope for ICCAT to act in the coming weeks and finally start to reverse the decline, but half measures will not be enough. **To prevent a longstanding disaster and negative long-term impacts for all stakeholders, we need immediate, concerted, effective action across the North Atlantic in the form of the simple, recommended retention ban.**

To that end, we strongly urge you to lead the U.S. toward actively pursuing ICCAT's immediate adoption of the scientific advice for this extraordinary shark, as a matter of priority.

Thank you for considering our views.

Sincerely,



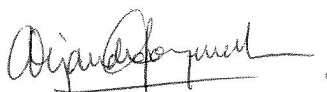
Sonja Fordham
President
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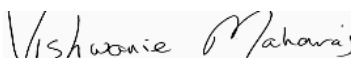
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Dr. John Graves, U.S. ICCAT Advisory Committee Chair