October 8th, 2019

Karmenu Vella
European Commissioner for Maritime Affairs & Fisheries
European Commission
Rue de la Loi/ Wetstraat 200
1049 Brussels

cc. Mr Matthias Leonhard Maier, Mr Anders Jessen

Dear Commissioner Vella:

We write to request coordinated action by the European Commission to ensure that Endangered Mako Sharks receive urgently needed protections at the November meeting of the International Commission for the Conservation of Atlantic Tunas (ICCAT), consistent with pressing scientific advice and commitments surrounding the species' inclusion in Appendix II of the Convention on International Trade in Endangered Species (CITES) last August.

Relatively low reproductive rates leave most shark species exceptionally vulnerable to overfishing. Mako Sharks are particularly valuable, under-protected, and threatened. Earlier this year, the International Union for the Conservation of Nature (IUCN) classified both Shortfin Mako *(Isurus oxyrinchus)* and Longfin Mako *(Isurus paucus)* as globally Endangered on the IUCN Red List. These factors and growing public concern –particularly regarding the dire status of North Atlantic Shortfin Makos -- weighed heavily in the CITES listing decision.

Given the position of the EU, and its Member States, as a proponent of the proposal that led to CITES listing for Mako Sharks, the European Commission's continued leadership toward ending unsustainable exploitation of these highly threatened species is particularly important.

For more than a decade, ICCAT's response to scientific advice on Mako Shark fishing has been wholly inadequate. Ecological Risk Assessments conducted in 2008 and 2012 ranked both Mako species very high for vulnerability to ICCAT fisheries. ICCAT has since skipped over Makos while banning take of many other shark species. ICCAT's 2017 Shortfin Mako population assessment clearly documented serious depletion and overfishing in the North Atlantic. In May, updated projections pushed the earliest possibility for recovery to 2045, five years later than predicted just two years ago. This scenario has a 53% chance of success if all mortality is

ended. If annual Shortfin Mako catches from across the North Atlantic (including those discarded dead) are cut from current levels (~3000t) to below 300t in 2020, recovery is predicted to take 50 years (60% probability).

ICCAT scientists this year, after confirming that the complicated 2017 ICCAT measure for North Atlantic Shortfin Makos is seriously insufficient to halt overfishing, reiterated their **recommendation for a prohibition on retention and additional measures to minimize discard mortality.** They noted retention bans can be effective for dramatically reducing Shortfin Mako mortality because post-release survival can be as high as 75%.

Although ICCAT scientists have recommended a catch limit of 2001t or less for Shortfin Makos in the South Atlantic, they flagged significant risk that this population may follow a path similar to that in the North. These warnings -- in light of the new CITES listings, species' similarity and vulnerability, enforcement challenges, catch data uncertainties, and commitments to the precautionary approach -- argue for banning retention of both Mako species throughout the Atlantic.

For these reasons, we urge the European Commission to prepare, submit, and begin promoting a proposal to have ICCAT prohibit Mako Shark retention and minimize incidental mortality of both species.

We look forward to working with your representatives toward ensuring that exploitation of Atlantic Mako Shark populations is sustainable, consistent with mandates under ICCAT and CITES.

Thank you for considering our views.

Sincerely,

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Shark Trust

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Shark Advocates International

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