

## ***Bridging the Gaps that Hinder Shark Conservation***

**Information Submitted to the ICCAT Compliance Committee, July 16<sup>th</sup>, 2023**

**Shark Advocates International (a project of The Ocean Foundation), Ecology Action Centre, and Shark Trust** maintain a special focus on elasmobranchs (sharks and rays) because of vulnerability that stems from their relatively low reproductive rates as well as their traditionally low priority among fishery managers. Our organizations operate in a coalition (known as the Shark League) toward safeguarding elasmobranchs through the International Commission for Conservation of Atlantic Tunas (ICCAT). We appreciate the efforts of ICCAT's Compliance Committee to evaluate Parties' performance in implementing international shark fishing limits through domestic policies and improve associated processes, as such work is key to successful conservation of migratory species.

Because elasmobranchs are considered both commodities and wildlife, governments' approaches to fisheries and environment treaty obligations are often misaligned. Increased scrutiny of these policies is essential to ensuring their effective implementation and, ultimately, population rebuilding. To that end, the Shark League is producing a gap analysis that examines the effects of Atlantic shark and ray protection measures under various treaties, primarily ICCAT and the Convention on International Trade in Endangered Species (CITES). We are evaluating the performance of ICCAT Contracting Parties and Cooperators (CPCs) with respect to various obligations for CITES-listed elasmobranchs, highlighting key gaps between concrete restrictions and conservation needs, and recommending priority improvements at national and international levels. This document includes preliminary findings from our ongoing analysis that we hope will assist in the Compliance Committee's November 2023 focused examination of the information contained within CPCs' "Shark Check Sheets."

### **Sharks in Common**

All of the shark measures adopted by ICCAT address CITES-listed species. We appreciate the eight CPCs that mentioned CITES obligations in their 2022 ICCAT Compliance Committee Shark Check Sheets: **Barbados, Curaçao, EU (Portugal), Liberia, Morocco, Senegal, Costa Rica, and Guyana.**

	<b>Bigeye thresher</b>	<b>Oceanic whitetip</b>	<b>Hammer-heads</b>	<b>Silky shark</b>	<b>Porbeagle shark</b>	<b>Shortfin mako</b>	<b>Blue shark</b>
<b>ICCAT limits</b>	2009	2010	2010	2011	2015	2017	2019
<b>CITES listing</b>	2016	2013	2013	2016	2013	2019	2022

### **Inadequate Reporting**

Lack of information on shark fishing and trade is a primary and persistent hurdle to conservation noted in countless CITES and ICCAT documents. In these and many other realms, governments' reports are too often incomplete, inconsistent, late, or non-existent. We strongly support ICCAT increasing scrutiny of the implementation of shark-specific measures through Compliance Committee Shark Check Sheet solicitation and review process and hope that our contributions are useful.

While non-reporting is an obvious problem, we recognize the difficulties in determining if increased landings reflect higher fishing pressure or simply better reporting, and similarly, if lacking records are the result of compliance with restrictions or depletion of the population.

## GENERAL ICCAT CONCERNS

### Shark Check Sheets

We recognize the overall increase in the number, clarity, and detail associated with the Shark Check Sheets since 2019 and look forward to thorough evaluation and discussion of the 2023 submissions at the November Compliance Committee meeting. While we recognize an overall improvement increase in the clarity and detail in Shark Check Sheet input since 2019, analysis of the 2022 Shark Check Sheets reveals that many CPCs continue to fall far short of implementation and reporting requirements and/or offer responses that are too often vague, contradictory, and otherwise inadequate. These persistent problems seriously hinder compliance monitoring and, in turn, further jeopardize shark population health.

We are particularly concerned that 11 CPCs submitted their 2022 Shark Check Sheets late while eight failed to submit them at all: **Angola, Côte D'Ivoire, Gambia, Grenada, Guinea Bissau, Guinea, Mauritania**, and notably **Namibia**, which ranks fourth in shark landings reported to ICCAT.

Many CPCs still lack binding domestic measures to implement ICCAT shark Recommendations and/or continue to fail to report on such policies in sufficient detail. The following CPCs have extensive gaps with respect to citing and/or explaining relevant domestic shark regulations: **Barbados, Côte d'Ivoire, Curaçao, El Salvador, Ghana, Honduras, Liberia, Nicaragua, Nigeria, São Tomé e Príncipe, Trinidad and Tobago, Costa Rica, Guyana, Suriname, St. Vincent and the Grenadines, and Venezuela**.

In addition, a great number of CPCs, despite repeated guidance to the contrary, continue to include invalid excuses in order to avoid submitting the required information:

- 43% of CPCs (21 of 49) submitted answers that were contradictory, vague, and insufficiently detailed, to understand if corresponding domestic management is in place;
- 43% of CPCs also continue to claim “no target fishing” or “no fishing” for at least one species, even though the Compliance Committee Chair has been notifying CPCs for several years that these responses are not acceptable. In particular, **Algeria, Cabo Verde, St. Pierre et Miquelon, Gabon, Guatemala, Guinea Equatorial, Senegal, Sierra Leone, and Suriname** use this excuse extensively;
- 22% of CPCs (11 of 49) claim that at least one managed shark species does not occur or is ‘not caught’ in their waters as a reason to omit information, even though the SCRS has yet to confirm any CPC exemptions on this basis: **Algeria, Barbados, Brazil, Ghana, Honduras, Iceland, Norway, South Africa, Tunisia, Costa Rica, Guyana**<sup>1</sup>;
- several CPCs such as **Guatemala, Honduras, Nigeria, Philippines, and Bolivia** report that they have no ICCAT vessels or do not fish in the Convention area (another unacceptable response).

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<sup>1</sup> We note that two Parties (Norway, Tunisia) have made an effort to submit this request officially for consideration.

### **To address these problems, the Compliance Committee should:**

- clarify for CPCs that reporting of Task 1 catch data and relevant domestic regulations is required, even when shark interactions are incidental;
- stress to CPCs, even those without ICCAT vessels, their obligations to provide details on binding domestic regulations for the implementation of all ICCAT measures, including every shark Recommendation;
- elaborate on guidance for proper Shark Check Sheet responses with respect to:
  - CPCs without active ICCAT vessels active, and
  - ICCAT shark species caught in artisanal and/or inshore fleets, and non-pelagic gear;
- work with the SCRS to develop a process for validating CPCs' exemption requests based on claims that species or populations do not occur in their waters, as well as broader conclusions about exemptions for CPCs whose vessels do not fish in one the relevant hemispheres;
- prioritize focused efforts to ensure CPCs fulfill shark reporting requirements; and
- suspend CPCs' fishing rights until shark reporting requirements are met, in line with Rec. 11-15.

To support continuing improvements over time, the ICCAT Secretariat should review data reporting for all sharks managed under ICCAT and identify the CPCs that have failed to report shark catches, including discards, as required by Rec. 04-10.

### **Discards**

Also troubling is the low level of reporting discarded sharks, despite ICCAT measures that ban the retention or encourage the release of at least nine shark species. Only six ICCAT Parties report more than 100t of shark discards over the last decade. In particular, discards reported by the **EU**, the leading CPC for shark landings (by far) over the last decade, would be expected to far exceed those reported by the 11<sup>th</sup> ranked **US**, and yet they do not (1796t vs. 1280t, 2012-2021).

We encourage all CPCs to focus on improving discard reporting and ask that the Compliance Committee:

- specifically question the CPCs ranking in the top ten for ICCAT shark landings that report no discards at all (zero or blank): (**Namibia, Morocco, Ghana, Senegal, and Belize**); and
- remind CPCs that their Task 1 catch reporting obligations apply, not only to landings, but also to discards, including the condition of the shark (live or dead).

## **Shark Finning**

A November 2022 *Mongabay* exclusive<sup>2</sup> detailed incidents of shark finning on vessels from Dalian Ocean Fishing (DOF), a **China**-based tuna firm that includes seven longline vessels operating in the Atlantic Ocean. According to this comprehensive article, a deckhand who worked on one of the Atlantic vessels said roughly 30 sharks were caught per day and 90% of the finned carcasses were discarded. Almost every DOF deckhand interviewed said their boat had transshipped shark fin with other boats in violation of ICCAT rules. Deckhands from three DOF Atlantic longliners recounted fin transfers to vessels outside DOF's fleet. Deckhands from two of those longliners said they'd offloaded fins onto a vessel called the Lisboa; a **Senegalese**-flagged boat with the same name has a track record of illegal shark fin transshipments. Another DOF Atlantic longliner recalled offloading fins onto a non-DOF boat on four separate occasions.

Overall, evidence of shark finning is difficult to obtain because the current lenient monitoring standard (5% fin-to-carcass ratio) is complicated, imprecise, and otherwise difficult to enforce. We note that information submitted by several CPCs, including **Mexico, Barbados, Cabo Verde, Côte d'Ivoire, El Salvador, Gabon, Guatemala, Iceland, Norway, São Tomé e Príncipe, Senegal, St. Pierre et Miquelon, Trinidad and Tobago, and Guyana** fails to clarify if the 5% ratio minimum standard or other enforcement standards are reflected in a specific domestic regulation. We once again stress that requiring that sharks be landed with fins naturally attached is by far the most reliable means for enforcing a finning ban. Such policies also facilitate the collection of species-specific catch data that can greatly enhance compliance monitoring and population assessment.

## **Retention Ban Exceptions for Hammerheads and Silky Sharks**

CPCs' reports regarding implementation of ICCAT measures for hammerhead (Rec. 10-08) and silky sharks (Rec. 11-08) and associated scrutiny by the Compliance Committee have been seriously insufficient for more than a decade, particularly with respect to information on how the CPCs taking exemptions are meeting the associated conditions (to prevent catch increases and prevent international trade). At its November meeting, the Compliance Committee should ensure in-depth discussion of the exemptions but, in the broader context, allowing them to continue is very difficult to justify.

## **SPECIES-SPECIFIC CONCERNS**

### **Hammerhead Sharks** (*Sphyrna spp.*)

A particular conservation challenge for hammerheads stems from their semi-pelagic nature and resulting capture in both coastal and pelagic fisheries. As CPCs tend to manage coastal fisheries separately, most governments report only a fraction of their total hammerhead landings to ICCAT (as opposed to FAO), especially when taken in artisanal fisheries and/or demersal gear. This data gap seriously complicates efforts to monitor compliance and effects of the ICCAT measure. As mentioned, while the CITES listing is generating important data on trade in hammerhead fins, exports are tied to countries, not ocean regions.

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<sup>2</sup> Mongabay Series: Illegal Wildlife Trade, Oceans: Shark finning rampant across Chinese tuna firm's fleet, November 1, 2022: <https://news.mongabay.com/2022/11/exclusive-shark-finning-rampant-across-chinese-tuna-firms-fleet/>

We note that three CPCs – Trinidad and Tobago, Senegal, and Ghana – are responsible for more than 6000t of the nearly 7500t of landings reported since 2010 (usually by genus) and that these countries take different approaches to accounting for the exploitation.

Approximately 45% of ICCAT hammerhead landings are attributed to **Ghana**, with more than 1000t reported in 2014 and about 300t every year since. On its Shark Check Sheet, Ghana answers “Yes” to questions about implementing both the ban and its exceptions, while noting to a lack of domestic regulations. There are no CITES reports of Ghana exporting hammerheads or introducing them from the sea.

**Senegal**, which ranks second among ICCAT CPCs for hammerhead landings since the ICCAT measure took effect, states in its Shark Check Sheet that it is implementing the ban, that exemption is not applicable, and “it is prohibited to fish for these sharks.” Senegal cites a specific decree banning hammerhead retention and sale, while noting that entry of CITES-listed species into the international market is controlled by the Ministry of the Environment. Nevertheless, Senegal reported 444t of smooth hammerhead landings in 2013 before reverting to genus level records that have since fluctuated between about 30t and 243t annually. Senegal reported exports of approximately 10t (converted using FAO factors for meat and fins) of smooth hammerhead fins in 2015<sup>3</sup>, the year that the CITES listing for the species came into force. We encourage Senegal to resume species-specific reporting, re-evaluate the sustainability of hammerhead exports, and clarify which fisheries are subject to the domestic hammerhead ban.

**Trinidad and Tobago** takes an exemption to ICCAT’s hammerhead ban that allows for substantial landings (3<sup>rd</sup> for tonnage among ICCAT CPCs). A national hammerhead export ban satisfies the ICCAT retention ban exemption condition and is backed up by the lack of international trade reports to CITES. An update on long-awaited revisions to the outdated national fisheries legislation (which reportedly does not allow for development of regulations to comply with many ICCAT measures) would be useful in evaluating long-term sustainability.

**Côte Ivoire** claims to have implemented the hammerhead ban yet regularly reports significant landings since its adoption. Most years show ICCAT landings of 10t or less, but nearly 275t were reported in 2017. We question if this stems from the separate management of pelagic and coastal fisheries.

#### **Silky Sharks** (*Carcharhinus falciformis*)

As silky sharks are more pelagic than hammerheads, ICCAT compliance monitoring of the associated ban should be less complicated. Using trade data to complement ICCAT reporting remains challenging, however, as several CPCs also fish silky sharks in the Pacific, where restrictions are more lenient.

The CITES database includes records of silky shark exports from **Nicaragua**, which would conflict with the ICCAT measure, but not international Pacific rules. To facilitate compliance evaluation, we encourage Nicaragua to break down their silky shark exploitation by ocean for ICCAT and develop a public NDF.

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Pavitt, A., Malsch, K., King, E., Chevalier, A., Kachelriess, D., Vannuccini, S. & Friedman, K. 2021. CITES and the sea: Trade in commercially exploited CITES-listed marine species. FAO Fisheries and Aquaculture Technical Paper No. 666. Rome, FAO.

**Costa Rica** claims an exemption to the ICCAT silky shark measure, but -- as noted above -- reports substantial international trade that runs counter to the associated conditions. Determining how much of the trade involves Atlantic silky sharks subject to ICCAT rules is complicated because the CITES database does not allow for that distinction and their various NDFs aggregate Atlantic and Pacific landings. We urge Costa Rica to explain the fishery and trade split in their Shark Check Sheet.

**Ghana** has reportedly landed about 100t of Atlantic silky sharks annually since 2016, increasing from nothing at the time the ICCAT measure was adopted. Ghana claims to be both implementing the ban and taking an exemption, while noting a lack of domestic limits. While recent landings are relatively high (second among CPCs), there is no CITES records of IFS or other international trade. Clarification is needed.

Whereas **EU** landings of Atlantic silky sharks dropped dramatically after adoption of the ICCAT measure, we are interested in learning more about the relatively low yet consistent landings that continue despite the ban.

**Guyana's** 2018 report of more than 300t of silky shark landings was the highest of all CPCs in the last decade. This is the year that ICCAT reports appear to have benefited from a data reconstruction project, suggesting that significant landings may have been going on unreported in the years prior and since.

Other CPCs claiming to be implementing the silky shark ban that have reported more than a ton of annual silky shark landings to ICCAT in 2019 and 2020 include **Mexico, Côte d'Ivoire, Grenada, Liberia, and São Tomé e Príncipe**. All warrant explanation.

#### **Oceanic Whitetip Sharks** (*Carcharhinus longimanus*)

**Mexico** is the only CPC consistently reporting annual landings (apparently in the absence of national species-specific limits). Considering the breadth of the ICCAT ban and the dismal status of the species (IUCN: Critically Endangered), we see compliance by Mexico as a top priority.

**Brazil** reports to ICCAT more than 6t of oceanic whitetip discards in 2017 followed by none since while annual landings of 1-7t (2013 to 2017) were reported to FAO but not ICCAT. We believe this situation warrants greater scrutiny.

**Dominica's** oceanic whitetip shark landings underscore the importance of ICCAT's continued efforts to expand membership and/or cooperation from countries that are not yet CPCs.

**Senegal's** claim that their "industrial fishery does not target or catch" oceanic whitetip sharks is an inadequate response under ICCAT Compliance Committee rules. Elaboration is in order.

We also urge the Compliance Committee to question CPCs that submitted inadequate responses with respect to oceanic whitetip protection: **Turks and Caicos, Costa Rica, Guyana, Honduras, and Nicaragua**.

### **Thresher Sharks** (*Alopias superciliosus*, *Alopias vulpinus*)

ICCAT catch reporting for threshers is usually by genus, which hinders both compliance monitoring for the bigeye thresher ban (Rec. 09-07) and assessment of common thresher populations. We note concern that the **US**, **Venezuela**, and **Chinese Taipei** are the only CPCs to report discards of bigeye threshers since 2018. Improved reporting is vital to protecting exceptionally vulnerable bigeye threshers and ensuring sustainability of common thresher fishing.

**Mexico** is the only CPC that was given an allocation of 110 bigeye threshers in the ICCAT ban. Mexico claims to be implementing the measure but has yet to cite species-specific limits. A recent CITES trade review (see CITES section) lists Mexico and **Senegal** for sharp increases in bigeye thresher exports; neither report landings of this species to ICCAT. Mexico's exports might be sourced from the Pacific where the species is not prohibited, but this scenario is unlikely for Senegal. We urge investigation by the Compliance Committee and recommend that Mexico's allocation be officially ended, especially considering that the bigeye thresher has been identified through an ICCAT Ecological Risk Assessment as the most vulnerable Atlantic sharks with respect to risk from ICCAT fisheries.

### **Shortfin Mako and Blue Sharks** (*Isurus oxyrinchus* and *Prionace glauca*)

As ICCAT limits and CITES listings for these two species are relatively new, compliance monitoring appears more challenging than for shark species that have been prohibited for many years. We are hopeful that overages of the South Atlantic blue shark TAC will soon be remedied by individual CPC allocations and that the North Atlantic shortfin mako retention ban will be extended far into the future to allow for declines to be reversed. We reiterate our concerns about inadequate discard reporting with respect to both of these species and encourage improved methods for estimating discard levels.

### **Manta and Devil Rays** (*Mobula spp.*)

Whereas CPCs have no ICCAT-mandated fishing restrictions for mobulid rays, improved reporting of encounters with these exceptionally vulnerable species is vital to their future. The vast majority of Atlantic mobulid catches reported to ICCAT occur in 2017 (see next section). Venezuela is the only CPC that reports landings; those numbers rose from zero in 2015 to 3t in 2021. Discards were reported by several CPCs including **Curaçao**, **El Salvador**, **Guatemala**, and **Panama**. Given the exceptional vulnerability of these species, ICCAT should follow all the other tuna RFMOs and adopt a ban on retaining mobula rays along with protocols for their safe release.

### **Capacity Building**

There are curious ICCAT reports for landings by **El Salvador**, **Curaçao**, and **Guatemala** of bigeye threshers, porbeagles, hammerheads, and oceanic whitetip sharks only in 2017. This year is also the only year with records of **Panama** discarding these same shark species and the start of a three-year period when **Ghana** reports landings of threshers and silky sharks. As mentioned above, the vast majority of ICCAT records (mostly discards) for mobulids were reported in 2017.

We are eager to learn if these data are related to an ICCAT-funded capacity building project<sup>4</sup> to evaluate artisanal fisheries targeting sharks in Caribbean and Central American countries. The

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<sup>4</sup> Arocha, F. (2019). Comprehensive study of strategic investments related to artisanal fisheries data collection in ICCAT fisheries of the Caribbean/Central American Region: Draft Final Report. SCRS/2018/114 Collect. Vol. Sci. Pap. ICCAT, 75(8): 2319-2368.

associated report demonstrates the benefits of investing in capacity building for improved fisheries data while heightening concern about unreported exploitation in other years.

## ABOUT CITES

CITES is a global agreement with 184 Parties aimed at ensuring that international trade does not threaten the survival of plants and animals. Most CITES-listed species are included on Appendix II, which requires Parties to demonstrate that exports are legally sourced without detriment to wild populations, and to employ a permit system to track associated trade. CITES regulation extends to the landing of listed species taken on the high seas, known as “introduction from the sea” (IFS). Between 2002 and 2022, more than 150 elasmobranch species have been added to Appendix II. Eight ICCAT CPCs have taken reservations on these listings. Japan opted out of most of them. **Norway, Iceland, and Guyana** have four reservations each. The Republic of Korea has two. The mako listings prompted the most reservations (10 including **Japan, Norway, Namibia, and South Africa**).

## CITES Information Relevant to ICCAT Compliance

The trade in CITES-listed shark and ray products reported to the CITES database is significantly lower than expected given global catch records and does not reflect the diversity of countries or species otherwise known to be involved. A lack of CITES trade reporting for pelagic sharks, in particular, raises concerns about potential inadequacies with regards to Parties’ implementation of CITES IFS requirements. Whereas any specimen of CITES-listed sharks taken in areas beyond national jurisdiction falls under CITES regulation, they can be reflected in CITES trade records in different ways. If vessels land them in their own flag state, they should be reported as imports from the high seas. If landed in a different country, they should be reported as exports. **Belize, South Korea, Spain, and Portugal** report exports of high seas commercial landings of CITES-listed sharks.

If implemented well, CITES introduction from the sea can be mutually supportive and complementary to ICCAT measures, given that Parties approving any type of international trade under IFS are to:

*(...) take into account whether or not the specimen was or will be acquired and landed:  
i) in a manner consistent with applicable measures under international law for the conservation and management of living marine resources, including those of any other treaty, convention or agreement with conservation and management measures for the marine species in question; (...)<sup>5</sup>*

More examination is needed to determine if the paucity of shark and ray international trade data in the CITES trade database reflects an effective reduction of fishing, a more temporary suspension of trade (with fishing and stockpiling continuing), a shift to domestic consumption, or unreported international trade in contravention with CITES obligations.

Nevertheless, CITES trade data and Parties’ “Non-Detriment Findings” (NDFs)<sup>6</sup> for shark species can offer information to enhance ICCAT compliance processes. In turn, ICCAT’s work on shark population

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<sup>5</sup> CITES Resolution Conf. 14.6 (Rev. CoP16), paragraph 3.

<sup>6</sup> „Non-detriment findings” are assessments by nationally designated Scientific Authorities that are required for States to issue CITES trade documents.



status, catches, fishing practices, and compliance can be valuable for informing CITES Parties' NDFs and evaluations of CITES implementation.

Greater transparency with respect to NDFs is widely recommended across the board. CITES does not require Parties to make their NDFs public, but has repeatedly invited Parties to share shark NDFs regionally for shared populations and generally on the CITES website<sup>7</sup>. Only four ICCAT CPCs (US, UK, Guatemala, and Costa Rica) have posted at least some of their shark NDFs on the CITES website. Seventeen ICCAT CPCs report commercial trade in CITES-listed sharks without publicly available NDFs. Japan, Canada, Panama, and Nicaragua report having NDFs for sharks, but have not made details related to export justification publicly available. The UK and EU appear to be the only CPCs with negative NDFs for CITES-listed sharks (both for shortfin mako).

### **Reviews of Significant Trade by ICCAT Parties**

If there is sufficient concern among CITES Parties that unsustainable international trade is continuing, CITES Appendix II-listed species can be selected for a Review of Significant Trade (RST) aimed at improving compliance by specific Parties. A new CITES RST Management System launched by the CITES Secretariat in 2022 helps increase RST transparency and engagement by allowing governments and stakeholders to track progress for selected country/species combinations online.

The first elasmobranch/country RST combinations were agreed in June 2023 by the CITES Animals Committee and include the following combinations relevant to ICCAT. The reviews were justified by the species' endangered status and "sharp increases" in global and country specific trade (export volume in 2021 was more than triple the average of the preceding five years):

- **China, Mexico, and Nicaragua** with respect to scalloped hammerheads
- **Mexico** with respect to great hammerheads
- **Senegal** with respect to oceanic whitetip sharks

For now, CITES shark trade data can be most illuminating within the ICCAT context for CPCs fishing only in the Atlantic (e.g. Senegal) because exports are not tied to regions. Over the next year, the RST process should shed light on ICCAT compliance questions regarding the percentage of hammerhead exports that Mexico and Nicaragua source from the Atlantic high seas (where ICCAT-dictated bans on retention or international trade should apply) versus the Pacific (where international restrictions are more lenient). Amending the CITES trade reporting protocols to provide for reporting by population and/or ocean basin could provide similar information on other shark species and CPCs while improving the ability to evaluate compliance and population health overall.

The CITES trade report that informed the selection of these species-countries combinations contained other issues of concern. Most notably, Costa Rica was identified as being responsible for 72% of global silky shark exports. This species-country combination was not selected for RST at the 2023 Animals Committee meeting because the dataset was still deemed too short. This case may, however, be a strong candidate for the next round of RST in 2026.

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<sup>7</sup> See e.g. CITES Resolution Conf. 12.6 (Rev. CoP18)

## Bridge the Gaps

In addition to the specific recommendations made above, our organizations urge ICCAT Parties to pursue the following actions through ICCAT, other international agreements, and domestic policies to improve compliance with existing ICCAT shark safeguards and enhance elasmobranch conservation more broadly.

- ICCAT:
  - Require 100% observer coverage (human and/or electronic) in industrial ICCAT fisheries
  - End all exceptions for retaining bigeye thresher, hammerhead, and silky sharks
  - Require species-specific reporting of thresher sharks
  - Allocate the South Atlantic blue shark TAC in line with 2023 stock assessment advice
  - Extend the retention ban on Endangered North Atlantic shortfin makos long-term
  - Prohibit retention of vulnerable longfin makos
  - Adopt a *Mobula* ray release protocol and retention ban
  - Require that sharks be landed with fins still naturally attached.
- CITES:
  - Share detailed shark NDFs and associated explanations, including ocean basin of origin, through the CITES website
  - Change trade reporting guidelines to require identification of products by ocean basin
- Other international agreements:
  - Support the proposal to list oceanic whitetip sharks on Annex II of the Specially Protected Wildlife and Areas (SPA) Protocol of the Cartagena Convention
  - Prioritize shark conservation progress at September 2023 meeting of the Western Central Atlantic Fisheries Commission (WECAFC)
  - Implement obligations under the Convention on Migratory Species (CMS), especially strict protections for oceanic whitetip sharks and mobulid rays.