RECOMMENDATION

LDAC ADVICE ON ICCAT ANNUAL MEETING 2026
25th Special Meeting of the Commission
Vilamoura, 16-23 November 2026

Date of adoption by Executive Committee: 16 September 2026

Ref. R-05-Ej.20 (2026-2027)/WG1

Recommendations on Horizontal topics

Fight against Illegal, Unregulated and Unreported (IUU) Fishing

In order to fight IUU fishing, the LDAC recommends the European Union to:

- Liaise with other ICCAT Contracting and Cooperating Non-Contracting Parties (CPC) to speed, as much as possible, the ratification of the new ICCAT Convention, adopted by the Commission in 2018 but not yet ratified by a majority of CPCs. To this end, the LDAC recommends that the European Union requests the Secretariat for an update on the list of CPC ratifications.

- Establish a fit-for-purpose, modern, complete and up-up to date ICCAT record of vessels, indicating which vessels do fish or not in the ICCAT area of competence. Reporting under form ST-01 is designed to allow such a listing by the Secretariat, but it is not correctly implemented. Assessing levels of fishing activity is then not possible. The European Union should urge CPCs to respect this obligation. The European Union should also insist that the ICCAT Secretariat collects and establishes the active vessel registry in order to undertake the planned estimation of the number of active vessels in ICCAT's area of competence. This register should also include:

    - Vessel's International Maritime Organization (IMO) number, which reporting should be compulsory for all eligible vessels, in line with IMO Resolution A.1117(30). Beneficial ownership information as it is requested in other regional fisheries management organisations (RFMOs), particularly within Recommendation 25-12 replacing Recommendation 21-14 Concerning the Establishment of an ICCAT Record of Vessels 20 Metres in Length Overall or Greater Authorized to Operate in the Convention Area.

- Strengthen the ICCAT compliance review process by supporting the adoption of changes to make it more effective and efficient, including the use of updated summary tables that highlight instance of serious non-compliance, convening the Compliance Committee meeting annually as per best practice by other RFMOs, and helping CPCs address their compliance capacity issues through tools such as the Capacity Self-Assessment Tool (CSAT).

- Establish a regional Vessel Monitoring System (VMS) for all vessels actively fishing in ICCAT area by building upon Recommendation 18-10 by ICCAT concerning minimum standards for vessel monitoring systems in the ICCAT convention area.

- Improve implementation of Recommendation 25-11 on port State measures (PSMs) to prevent, deter, and eliminate IUU fishing by facilitating a more efficient information exchange and by exploring the electronic PSM (e-PSM) options agreed at the ICCAT IMM meeting in June 2026. Further, agree to use either the Global Information Exchange System (GIES) or adopt the IOTC's e-PSM system, and tailor it to ensure the system meets ICCATs PSM CMM needs.

  We also recommend that Annex 1 of Recommendation 23-17 on Data fields for the reporting of port inspections is updated to be better align with FAO Port State Measures Agreement's Annex C, and other RFMO reporting requirements, including on capturing beneficial ownership information, and for the European Union and ICCAT to support intra-RFMOs and FAO deliberations on the harmonisation of these reporting templates.

- Support the establishment of a High Seas Boarding and Inspection (HSBI) scheme in ICCAT should enable all ICCAT CPCs to work together and equitably on vessel inspections and to ensure that members comply with ICCAT's conservation and management measures.

- Expand ICCAT's electronic catch document scheme to more species starting with bigeye and swordfish. We recommend that the EU fully supports the CDS WG, including associated costs, and encourage other CPCs to do the same with an aim of finalising and adopting the measure that is due for deliberation in this year's Commission meeting.

Fishing capacity

We are concerned by the lack of accurate and up to date information on active vessels fishing in the ICCAT Convention Area. We consider that the Standing Committee on Research and Statistics (SCRS) should progress with the estimation of fishing capacity levels in the ICCAT Convention Area, to be used to estimate the optimum levels of fishing capacity that would be required to achieve ICCAT's objectives.

Transshipments

- It is widely acknowledged that transhipment at sea increases the risk of IUU-caught fish entering the supply chain, undermining sustainable fisheries and ocean conservation[1]. They can also facilitate human rights abuses by allowing signs of forced labour and human trafficking—such as abuse and coercion—to go undetected offshore, and by preventing exploited crew from escaping or seeking help[2]. The EU maintains a stringent policy on transhipments, including a ban in Union waters, and EU Member States do not allow transhipments at sea even beyond their waters[3].

- The LDAC supports the total elimination of transhipments at sea and call on the EU to take decisive action toward this goal in ICCAT, including, in the interim tabling and/or supporting any proposal that enhances oversight and transparency of transhipment activities, including strict compliance with the already existing ban for transhipment of shortfin mako sharks (*Isurus oxyrinchus*).

- In the meanwhile, we support the continuation of the ICCAT Regional Observer Program for fishing vessels 24 meters Length Overall (LOA) engaging in transhipment operations at sea. We consider that port States must ensure that in-port transhipment operations – including and in particular at anchorage[4] – are appropriately monitored and controlled, in line with Recommendation 25-11 replacing Rec 23-17 on port state measures to prevent, deter and eliminate illegal, unreported and unregulated fishing or more stringent measures, in accordance with local and international law.

[1] FAO. (2020). Transhipment: A closer look – A review of practices in selected countries. FAO Fisheries and Aquaculture Technical Paper No. 653

[2] Environmental Justice Foundation. (2023). The weakest link: How transhipment at sea threatens human rights, labour, and environmental standards

[3] ICCAT. (2024). COC-301, Annual reports of CPCs

[4] In accordance with par. 1 of Recommendation 18-09 "Port" includes offshore terminals and marine areas of the port, and other installations for landing, transhipping, packaging, processing, refuelling, or resupplying.

In accordance with Rec. 25-11, "each year CPCs shall inspect at least 5% of landing and transhipment operations in their designated ports (…)".

Regional Observer Scheme (ROS)

- We note that ICCAT already requires observer coverage at 100% for purse seiners, 20% for bluefin tuna (Thunnus Thynnus) and 10% for tropical tuna vessels for longliners. Based on long-standing advice by the SCRS, we strongly recommend that the EU propose an immediate increase to a minimum coverage of 20% for all longline vessels, using either human or electronic methods, with a timeline to reach 100% coverage in the near future.

- While the existing coverage requirements are found in the multi-annual conservation and management plans for tropical tunas (Rec. 24-01) and bluefin tuna (Rec. 25-04), in order to promote consistency and reduce confuse, the LDAC recommends that the EU submits a proposal that would align the overage requirements in Recommendation 16-14 on minimum observation standards with those in the multi-annual plans. Recommendation 16-14 was due for revision in 2019, but it remains unchanged and outdated. The LDAC therefore recommends the EU to propose an update and alignment of the provisions of Rec. 16-14 with those in the multi-annual plans and to include incremental increase in longline observer coverage to 20% with the use of the adopted Electronic Monitoring Standards (Rec. 23-18).

- We also recommend that the EU encourage other CPCs to use the adopted electronic monitoring (EM) standards while continuing the development of further standards for all relevant fleets to assist in the collection of data. This should include the adoption of a set of technical EM definitions to enhance consistency and coherence across the tuna RFMOs. The EM standards should be complemented with appropriate audit and assurance processes to ensure that EM programmes are collecting and sharing accurate information in a standardised way.

Management strategy evaluations

We support the development of management strategy evaluation (MSE) processes within ICCAT and advocate for increased exchange between scientists, policy makers, fishing industry, and stakeholders. As shown by the recent example of the development of the Bluefin tuna management procedure (MP) in ICCAT with, inter alia, a series of ambassadors' meetings, we consider it could be a model to be followed for tropical tuna stocks also.

We also support the inclusion of an MSE Coordinator position in the budget, as requested by the SCRS. The position is important to ensure the efficiency of, and consistency across, ICCAT's MSE processes. Noting that SCRS submitted an explanatory note in 2025 – that this position will present no additional financial constraint, since having an MSE expert on staff to conduct some of the analyses will reduce the need for external contracting, saving money in the long term for both development and implementation. The balancing of these funds through the SCRS budget process was also discussed last year.

Data collection

We recall the need to establish and strengthen data collection of tuna and tuna-like species for all fleets, including recreational ones, and artisanal fisheries across the ICCAT Convention Area, in order to estimate mortality produced by this sector to improve robustness of stock assessment and associated management advice. This also applies for the reporting of dead discards and live releases of ETP species and other non-retained species. Especially for sharks, the continued non-reporting of discards hinder stock assessments and the implementation of required CMMs.

Labour Standards

A discussion paper on labour standards on fishing vessels in IOTC fisheries from P. Cacaud[5] was presented, warning that while several RFMOs have adopted resolutions on crew welfare and labour conditions, these instruments systematically fall short of internationally agreed standards developed by the International Labour Organization together with social partners and crew representatives, especially under the ILO Work in Fishing Convention (C188). The LDAC stands against the adoption of any recommendation or resolution on minimum labour standards on board fishing vessels for all CPCs that would not be at least of equal or higher standards than ILO C188.

Cooperation with other RFMOs

In 2025, ICCAT agreed to develop a memorandum of understanding (MoU) with the North Atlantic Fisheries Organization (NAFO). The LDAC recommends for the EU to ensure that the ICCAT Secretariat advances this effort this year to ensure proper data sharing and transparency in the region. In line with their commitments to implement BBNJ, RFMOs should also put in place agreements and mechanisms to that effect (i.e. MoU between NAFO and ICCAT similar to that between ICCAT and SEAFO). This type of MoU can promote greater monitoring and collaboration, expanding beyond sector specific goals to provide a more holistic picture of ecosystem health.

[5] https://iotc.org/sites/default/files/documents/2026/04/IOTC-2026-S30-14E.pdf

With this in mind, the LDAC also recommends that the EU urges CPCs to endorse a NAFO/ICCAT MoU and consider a similar MoU with OSPAR for similar reasons.

Scientific advisory process in SCRS

The LDAC is also concerned about the approach used at some SCRS meetings regarding the invitation of experts and the presentation of documents using high-resolution data without the consent of the flag states concerned.

The LDAC recommends that the Commission ask ICCAT to streamline its procedures for the invitation of experts and set a clear protocol for data use.

ICCAT Panel 1 – Tropical tuna fisheries

LDAC recommendations on a multi-annual management plan for tropical tunas (PA1)

The LDAC is concerned by the continuous insufficient monitoring of purse seiners from Senegal and Ghana, which have reported incomplete statistical data to ICCAT, and from the insufficient progress made during Panel 1 intersessional meetings, especially regarding the establishment of a TAC for yellowfin tuna.

The LDAC still recommends allocating the quota for yellowfin tuna as soon as possible, as well as improving and effectively implement compliance schemes within the ICCAT.

Yellowfin tuna (YFT) allocation

The LDAC notes that a full stock assessment was conducted for yellowfin tuna in 2024, resulting in the SCRS declaring the stock being not overfished nor subject to overfishing with a 58% probability.[6]

However, as Rec. 11-01 established a TAC of 110,000 t but did not establish limits by CPC, the SCRS in his 2025 meeting expressed concern that the TAC has been exceeded for five years and that maintaining the current level of catch of 141 000 t. average might result in overfishing; the SCRS also advised "*to establish a mechanism to ensure that the catches of yellowfin tuna do not exceed any adopted TAC*"[7]: In fact, the current TAC has been exceeded in all but 1 year (2013), by as much as 40%.

The LDAC is also worried that the recent dramatic increase of the tropical tuna catches from the Asian owned purse seine fleet flagged in Ghana and Senegal despite established the established quota of bigeye, as well as increased catches from the Brazilian "vessel associated school" handline fishery operating in the western Atlantic from 1,600 t in 2012 to over 14,000 t in 2023 are extremely worrying.

From 2016 to 2023, Senegal and Ghana's purse seine fleets have drastically increased their total catch of tropical tuna, including doubled their catches of yellowfin tuna[8] while bigeye catches are decreasing.

The LDAC then recommends that the European Union proposes an allocation for yellowfin tuna in 2025, taking advantage of the stock being in the green.

The LDAC also recommends that in order to maintain its tropical tuna fleet activity in the Atlantic Ocean, the European Commission negotiates for a system of allocation that ensures level playing field between EU and non-EU vessels and preserves the European fishing possibilities in the Atlantic.

[6] 2025_SCRS_ENG.pdf 13.1. Outlook: "In most cases, catches less than 125,000 t led to, or maintained, a healthy stock status through 2034."

[7] 2025_SCRS_ENG.pdf 13.1. Management Recommendations, p.15: "The Committee reiterated concern that catch levels, averaging about 141,000 t over the last 5 years (2018–2022), are expected to result in overfishing and lead to an overfished status if they continue. Furthermore, given that the TAC has been exceeded continuously by substantial amounts, existing conservation and management measures appear to be insufficient to limit harvest. The Committee recommended that the Commission establish a mechanism to ensure that the catches of YFT do not exceed any adopted TAC."

[8] According to ICCAT's data discussed at the bigeye stock assessment meeting in July 2025.

Bigeye tuna

The LDAC notes the results of the Bigeye tuna (BET) stock evaluation conducted in 2025, which determined that the stock is not overfished nor subject to overfishing with a high probability (74%). The new stock status is mostly supported by the low catches of bigeye tuna reported in recent years, and a less uncertain stock assessment, driven by more reliable estimates of a joint-longline index of abundance from Asian fleets and estimates of natural Mortality for the stock. They result in the current TAC (73011 tons) likely to maintain the stock in the green quadrant of the Kobe Plot with a 91% probability, meaning that the Commission could consider increasing the TAC and/or reducing other measures, such as the FAD Closure, without compromising stock status in the future[9].

To ensure that the global TAC is respected while having regards for the developing countries' right to fish, **the LDAC recommends that the European Union requires efficient monitoring as well as prior information to ICCAT of fishing management plan for low-income CPCs that are planning to develop their fisheries in order to anticipate needs for quota transfers**.

On the specific question of monitoring, ICCAT currently requires contracting parties, depending on their bigeye total catch levels, to report either by quarter, month or week, in order to ensure timely monitoring of the compliance with their individual bigeye catch limits. However, these reports are not correctly done. **The LDAC then recommends that the EU insists on implementing correctly this obligation.**

The LDAC also recommends that EFCA includes ICCAT in its control plan for regions outside the European Union. Until an HSBI scheme is adopted in ICCAT, it is still possible to sight and report suspicious activity, including checking on potentially non-authorised vessels and FAD fishing during the moratorium.

Western Atlantic skipjack (WSKJ)

The LDAC urges the EU to support the adoption of exceptional circumstances protocol for WSKJ. At the 2025 Commission meeting, ICCAT adopted an MP to set a constant TAC for western Atlantic skipjack at 30,844 t, for the period 2026-2028. Following the footsteps of previous successful MSE efforts, this year, ICCAT should adopt an exceptional circumstances protocol (ECP) that defines a streamlined approach to identify and respond to conditions beyond the scope of what was tested in the MSE. An ECP will ensure that this WSKJ MP remains adaptive and effective for long-term fisheries management.

[9] 2025_SCRS_ENG.pdf 13.2. Management recommendations, p.20

FAD technical measures

Biodegradable FAD Calendar

The LDAC notes that at the 29th ordinary meeting of the Commission as well as during the PA1 intersessional meeting of May 2026, some countries expressed concern regarding the implementation schedule of ICCAT[10].

The LDAC reiterates its support for transitioning to biodegradable FADs and reminds that Compared to other RFMOs, ICCAT's schedule allows little room for gradual adaptation, with requirements for Category II by 2026 and full biodegradability by 2028 misaligned with current technological readiness.

The LDAC notes that there is currently limited diversity of organic materials with adequate performance (particularly required lifespan). Synthetic marine-biodegradable materials (biopolymers) are scarce and not widely available, and the certification process for new options can be slow, misaligned with established timelines. As a result, Atlantic-type FAD subsurface structures are difficult to replace with biodegradable alternatives. These designs use deep (≈80 m) canvas panels that endure high tension, which most biodegradable materials cannot withstand in traditional configurations. As a result, their lifespan is likely much shorter, making them inefficient for fishing. No viable biodegradable flotation alternatives exist yet.

The LDAC recommends that, as complying with the current timelines for biodegradable FAD implementation in the Atlantic Ocean is seen as unrealistic by the fleet, the ICCAT implementation calendar should be revised with a new appropriate and ambitious target set that is no later than IATTC's.

FAD Closure

The LDAC reminds that, recognizing both the SCRS advice indicating that for bigeye tuna, the main driver of the stock status is the quota, not any moratorium, and also recognizing that the ICCAT FAD moratorium was deeply lacking compliance from non-EU fleets, namely vessels from Ghana and Senegal, it was decided during ICCAT's 24th extraordinary meeting to decrease the moratorium from 72 to 45 days. There was no change in 2025.

The LDAC reminds that the socio-economic impact of the FAD moratorium on the EU fleet has been very severe since 2020. Four EU purse seine vessels have already ceased their activity and globally, the EU vessels' number, catches and productivity have been decreasing because of the moratorium. According to STECF 2024 Annual Economic Report, the 72 days closure for FADs (Fish Aggregating devices) from 1 January to 31 March in the Atlantic Ocean is one of the main drivers and limiting factors affecting EU fleet performance in the ICCAT RA[11], as it has a negative impact in terms of fleet activity and level of catch of French and Spanish purse seine active vessels in ICCAT RA.

[10] iccat.int/Documents/BienRep/REP_EN_24-25-II-1.pdf p.15

[11] STECF AER 2024: https://stecf.ec.europa.eu/data-dissemination/aer_en – See pages 72 and 232-3

The LDAC is also worried that tuna dependent economies among coastal states also suffered severe consequences: several canneries have closed in Cabo Verde and Côte d'Ivoire, not receiving enough and regular supply from European fleets. They also receive less financial contribution from EU shipowners, that were not able to fully utilize SFPAs fishing possibilities.

Finally, the main challenge for the FAD closure to be effective and achieve its aim of a sustainable use of marine resources is directly linked to the importance of further strengthening an effective and verifiable level playing field.
If non-EU flagged fleets do not comply with the rules, then sustainability in the tuna fisheries will not be either environmentally sustainable, economically viable, or socially equitable. Thus, checks and balances within ICCAT constituent bodies coupled with effective monitoring, compliance and sanctioning mechanisms within the already existing international framework must be reinforced.

The distortive effects of an uneven level playing field have already negatively affected the EU tuna fishing sector whose competitiveness has been undermined by other players not subject to or sharing equivalent high environmental, social or labour standards.
The LDAC warns that, since last year, compliance from Asian fleets has not improved.

In view of the above, including last year´s scientific advice, in view also of the good status of the bigeye tuna, and noting that the LDAC is recommending an allocation for yellowfin tuna the following diverging positions are stated:

- **The fishing sector's members of the LDAC recommend that the EU reconsiders the FAD closure and table a proposal accordingly for ICCAT;**

- **The NGO members of the LDAC recommend that the EU requests that the Commission reexamines the effectiveness of the FAD closure based on a request for clear scientific advice from SCRS, noting that adoption of the multi-stock tropical tunas management procedure was delayed until 2027, so reducing the FAD closure before then would be premature.**

Given the fact that the measurable socio-economic impacts of the FAD closure and other management measures has not yet been assessed, **the LDAC would like to see the EU proposing the creation of a Working Party on socioeconomics in ICCAT, similarly to those in other tuna RFMOs**, which would have the objective of assessing the impacts on the economic and social dimensions of sustainable management of fisheries under the ICCAT mandate.

ICCAT Panel 3 – Southern temperate tunas

South Atlantic Albacore

In 2024, ICCAT adopted operational management objectives to guide the design of the South Atlantic albacore (SALB) MSE. In 2025, a technical team was established, and work is now well underway for a 2027 MP adoption – per the SCRS recommendations and Commission MSE roadmap.

The LDAC recommends that the EU urge CPCs to support this effort by reviewing and providing feedback on preliminary MSE results at the November 2026 Commission meeting and by scheduling at least one Panel 3 intersessional meeting in 2027 to review the MSE results and narrow down the list of candidate MPs to consider for adoption.

ICCAT Panel 4 – Sharks and other species

Fins Naturally Attached (FNA) Policy

- The EU has been a pioneer in ensuring full utilization of sharks through the adoption of its Regulation (EU) No 605/2013 (so-called "Shark Finning Regulation"). Unfortunately, these proposals have so far always failed due to the opposition from Japan and China including in 2025 leaving ICCAT the only tuna RFMO that has not yet made any progress towards strengthening its finning ban for more than 20 years.

- The LDAC also reminds that IOTC has made progress in 2025, adopting Resolution 25-08 on the conservation of sharks caught in association with fisheries managed by IOTC, which strengthens the fins naturally attached policy in the Indian Ocean for sharks landed frozen while all shark landed fresh must comply with fins naturally attached without exceptions.
-

- From 2026 to 2028, each CPC is allowed only one alternative to the fins naturally attached policy for shark landed frozen, subject to annual reporting of successful enforcement. In case of non-compliance, immediate forfeiting of the granted exemption to use the chosen alternative will apply.

- **The LDAC insists that, for sharks landed frozen, the use of alternatives, if any, expires at the latest in 2028 with "Fins Naturally Attached without exceptions" automatically prevailing per default as the only acceptable measure thereafter.**

- During ICCAT's annual meeting in 2025, the "Commission Chair expressed disappointment at the lack of progress on proposals related to the prevention of shark finning. He expressed concern about the absence of agreements and non-ratification of the Palma de Mallorca Protocol, cautioning that ICCAT's inaction could create a regulatory vacuum that would be filled by other international organization"[12].

  In view of the above considerations, the LDAC recommends the EU to resubmit their previous proposal and/or be ready to align/co-sponsor similar proposals.

- **The LDAC recommends that the Commission must insist on reaching a consensus and stress that ample time for negotiation and discussions has been provided for more than 16 years, and that Fins Naturally Attached is the most effective measure to prevent shark finning and reaching a sustainable fishery, controlling at the same time the whole market of the captures, with the aim to eliminate the IUU practices.**

If negotiations fail again, the LDAC urges the European Commission to clarify that the EU fleet has consistently supported the 'fins naturally attached' policy as a standard practice. It is crucial to ensure that no responsibility for the failure of negotiations is attributed to the EU fleet.

[12] Report of the 29th regular meeting of the Commission in 2025, p.13

Commercially Targeted Sharks

Northern stock of Atlantic Shortfin Mako - SMA (*Isurus oxyrinchus*)

Recommendation 21-09 has established a total mortality limit of 250 t for the North Atlantic SMA to allow at least for a 60-70% probability of rebuilding this overfished stock by 2070. However, despite the retention ban the estimated annual total mortality has continued exceeding 1000 t.

The LDAC recommends that the EU requires ICCAT / all CPCs to review the effectiveness and/or implementation of existing compulsory measures to avoid catching shortfin mako sharks. ICCAT secretariat should clarify which CPC is compliant and which is not, and ICCAT should target those who are not compliant.

The stock assessment took overall more than 2 years and in view of the remaining uncertainties clearly highlights the need for closing existing knowledge gaps in the life history of shortfin mako sharks and other longevity sharks to better inform future assessments.

The outcome from the combined results indicated that in 2024 the stock was overfished but that overfishing was not occurring. The Kobe phase plot showed a 43.3% chance that the stock is currently in the yellow quadrant of the Kobe plot and a 18.3% probability of being in the red quadrant. The probability of being in the green quadrant was 37.1% and the probability of being in the orange quadrant 1.3%[13].

Therefore, the LDAC recommends prioritizing validating growth curves and other biological inputs by studies with adequate sample sizes and appropriate methods, including validation with an adequate range of ages for growth studies prior to any new stock assessment. Furthermore, alternative methods and metrics should be considered for shark stocks (e.g. spawning potential ratio) as MSY based reference points are highly dependent on population age structure, which is not well understood for some shark species.

Diverging positions:

- **The LDAC fishing sector member organisations note that the recent catch level is stable approximately at 1200 t and at this level the stock would recover to be in the green region of the Kobe Phase Plot (i.e. B>BMSY and F<FMSY) by 2040 with a 50% probability[14]. The fishing sector supports allowing the retention of mako shark bycatch that arrives dead at the side of the vessel, up to the current level of fishing mortality provided there are observers on board, which would enable the stock to recover and allow data collection to continue.**

[13] 2026 SMA ATL-N STOCK ASSESSMENT MEETING – HYBRID, LISBON, 2026; Report of the 2026 ICCAT North Atlantic Shortfin Mako Shark Stock Assessment Meeting (including Blue Shark MSE) (Hybrid, Lisbon, Portugal, 8–12 June 2026); page 10.

[14] Liniers et al., 2026. 2026 North Atlantic Shortfin Mako Shark Stock Projections. SCRS/2026/178

- **The NGOs member organisations SAR, Oceana, Pew, EJF and WWF conclude that in view of the high uncertainty expressed by the scientists and the fact that nearly all of the observed data are from juveniles, yet stock status is expressed in terms of the mature component of the population this assessment does not justify lowering the priority of reducing shortfin mako mortality. The referred NGOs therefore recommends maintaining the retention ban and updating Rec 21-09 to align the Management Objective for the stock rebuilding with the objective for the Southern Atlantic stock, i.e. to rebuild this stock with a probability of at least 70% by no later than 2050. In addition, the above referred NGOs recommend that the EU proposes to require all CPCs to propose and implement additional measures as requested by Rec 21-09 to effectively reduce the bycatch of SMA and to reduce SMA bycatch mortality.**

- **The NGO member organisations SAR, Oceana, PEW, EJF and WWF note that the stock assessment group emphasised that the use of only one life-history scenario for the projections from the stock assessment should not be interpreted as acceptance of this life-history hypothesis and also that the results in the Kobe II Strategy Matrix should be interpreted with caution in view of substantial remaining uncertainties.**

Blue Sharks

- The LDAC supports a long-term sustainable management for commercially targeted shark stocks and as such the speedy adoption of MSE based Management Procedures that ensure the long-term viability and sustainable exploitation of these commercially valuable stocks.

- Within the ICCAT convention area, EU longline fleets target only blue sharks for commercial purposes as the EU has prohibited the retention of any shortfin mako sharks in both parts of the Atlantic since 2020 respectively 2021.
  Shortfin mako sharks and all other shark species are prohibited from retention by any EU vessel.

- At last year's Commission meeting, many CPCs reiterated support for the SCRS to prioritise the blue shark MSE. In response to the SCRS request last year, the EU tabled a proposal for quantitative management objectives for blue sharks at the 2025 Commission meeting, a proposal that several CPCs supported.

- **The LDAC thus recommends that the EU builds on this momentum by resubmitting its 2025 proposal and adopting management objectives as well as funding the full development of a blue shark MSE for both the Northern and Southern stocks.**

MSE for Northern and Southern Atlantic Blue Sharks (Prionace glauca)

- At the PA 4 intersessional meeting the SCRS highlighted that it needs operational management objectives to support its work on the MSE and committed to inform the Commission how North and South Atlantic BSH MSEs will be developed in parallel, and possible implications for the timeline. A similar analysis of the BSH–SMA relationship as previously performed for the South Atlantic is planned for the North Atlantic too. For the South Atlantic no direct relationship was found between both species, while the SCRS recommended considerations should be made whether and how a BSH MP could potentially affect bycatch of other species, especially the overfished shortfin mako shark. However, this does not per se require a multispecies MSE but could be addressed otherwise.

- **The NGO member organisations SAR, Oceana, EJF, Pew, WWF recommend that the proposed management objectives for both parts of the Atlantic should reflect a precautionary approach for the short and long-term sustainable management of blue sharks and thereby implicitly respect the conservation needs for shortfin mako sharks without delaying or complicating the MSE for blue sharks by a multispecies MSE.**

- The LDAC welcomes the progress made by the SCRS in developing MSE tested MPs for both stocks of blue shark as presented at the PA4 Intersessional Meeting.

- **The LDAC therefore urges the EU to continue supporting the MSE roadmap by submitting a proposal for operational Management Objectives again at this year's Commission Meeting. Such management objectives should reflect a precautionary approach for the short and long-term sustainable management of blue sharks with a high probability for both parts of the Atlantic and thereby respect the conservation needs for shortfin mako sharks without delaying or complicating the MSE for blue sharks when pursuing a multispecies MSE.**

Sharks subject to existing ICCAT Recommendations and other vulnerable sharks

- The LDAC recommends that the EU insists on the effective implementation by all CPCs of existing conservation, handling, live-release and reporting requirements for shark species subject to ICCAT resolutions and/or recommendations. In particular, the LDAC is concerned that the EU fleet efforts to report shark discards, including estimates of live releases and dead discards, whereas several other CPCs are still not reporting their shark discards let alone whether these were released alive or discarded dead. The EU should therefore advocate for strengthened compliance with these requirements and for all CPCs to provide the information required under the relevant ICCAT Recommendations.

- The LDAC also recommends that the EU insists on full compliance by all CPCs with the prohibition on retaining live South Atlantic Shortfin Mako sharks, and to comply with the requirement to discard all dead mako sharks that are caught in excess of their quota defined by Rec 25-08, with the objective of maximising post-release survival.

- The SAR, Oceana, EJF, Pew, WWF further notes that Rec 25-08 already requires the release of live shortfin mako sharks applying best handling and live release practices with the objective of maximising post-release survival.

- The LDAC recommends that the EU submits a proposal for strengthening the existing retention bans for silky sharks, hammerhead sharks, and bigeye thresher sharks, including gear specific minimum standards for safe handling and live release for all gear types. Such a proposal should also include extending the retention ban for bigeye thresher to all species of thresher sharks and the retention ban for hammerhead sharks to all species of the family of Sphyrnidae including *Sphyrna tiburo* noting that all these species are difficult to differentiate without hauling them on board whereas releasing them in the water will substantially improve their chances of survival. This would facilitate monitoring and greatly improve compliance.

- The LDAC further recommends that the EU support strengthening the existing measures for silky sharks by extending the prohibition beyond retention, transhipment and landing to also cover the storage, sale and offering for sale of these sharks, in order to strengthen monitoring and prevent products originating from fisheries exempted from retention prohibitions from entering international trade.

AOB

Participation of stakeholders (as members or observers) in ICCAT plenary meetings

- The LDAC takes note of the First Meeting of the Virtual Working Group on a Sustainable Financial Position for ICCAT (VWG-SF) that took place on 31 March 2026 - a group chaired by the EU in its capacity as Chair of the Standing Committee on Finance and Administration (STACFAD). While observers were neither invited nor given the opportunity to register, we do acknowledge the need for a reasonable increase to participation fees but LDAC cannot support any room layout (such as option b.2) which severely limits meaningful stakeholder engagement and their expert contributions. The LDAC further notes that no other major RFMO has adopted such an approach.

  ICCAT's observer guidelines explicitly state that NGOs supporting the Commission can participate in all meetings (with a few exceptions) and the Rules of Procedure recognise that observers may address meetings and participate in their work. Relegating observers to a separate room would create a two-tier participation system that weakens transparency and undermines the long-standing contribution that observers make to informed and accountable decision-making within ICCAT.

With all this in mind, **the LDAC recommends that if the meeting room layout is revised the EU opposes option b.2 and support b.1 to allow registered stakeholders, including accredited observers, to remain in the main conference room of ICCAT annual meetings, subject to reasonable constraints. The LDAC further calls on the EU to support the participation of accredited observers in all ICCAT meetings and subsidiary bodies, consistent with established ICCAT practice.**

Topics for inclusion on third ICCAT Performance Review

Recognising the timeline proposed for the third ICCAT performance review, the LDAC recommends that observers be included in this review process and that MSE, CITES, BBNJ and climate change are featured as key areas under the draft terms of reference objectives.

-END-