



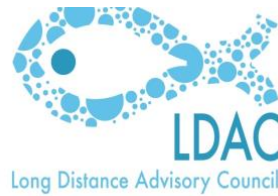
LDAC POSITION

LDAC recommendations to inform the EU position on conservation and management measures for North Atlantic Stock of Shortfin Mako (*Isurus Oxyrinchus*) caught in association with ICCAT fisheries

Originally drafted in English
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Status: approved
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General remarks

- The LDAC is concerned on the dire outcome of the stock assessment for this species, as a result of the update on projections based on the SCRS advice for 2017, with low signs of recovery extending over a very long period in time. The LDAC acknowledges the high vulnerability of Shortfin Mako to overexploitation and looks with concern the SCRS advice in October 2019, declaring the earlier possibility of recovery for this species for 2045.
- The LDAC acknowledges that the EU must take action and leadership on the adoption of proposals such as the one presented here to rebuild this by-catch fishery, given that 60% of the catches are caught by the EU fleet.
- The LDAC appreciates the recognition made by the European Commission on its proposal to ICCAT 2020 acknowledging the efforts made by the EU fleets since 2017 (when the stock started to be assessed as overfished by SCRS) to decrease its bycatches of shortfin mako by over 40%, by proactively seeking the avoidance of catch on a voluntary basis and despite the absence of a specific regulatory framework while expressing concern about the fact that 2019 catch data indicate that the stock remains overfished and subject to overfishing..
- The LDAC is in favour of increasing physical observer coverage of scientific observers to improve data collection and adding EMS (electronic monitoring system) as complementary tool for CPCs involved in the fishery, both EU and particularly non-EU fleets, that can feed the required data for SCRS advice.
- The LDAC asks the Commission to request that their own concerned Member States (Spain and Portugal) as well as other CPCs report every year and provide a list of the active measures taken by their flag vessels to reduce the catch levels of mako for their concerned fleets. This report could be done in a format that is valid to analyse by the SCRS.
- The LDAC supports the release of all alive specimens back to the sea and the accurate reporting in the logbooks.



LDAC Specific recommendations to EU proposals contained in Doc. PA4-804/2020 (16 Oct. 2020)

EU proposal No. 1

*In order to end overfishing immediately, this proposal introduces the **mandatory release of all fish caught alive in the context of all ICCAT fisheries**, in conjunction with a **Total Allowable Catch (TAC) of 500 t for the fish caught already dead**, and as confirmed by the presence of an observer/EMS onboard. As evidenced by the SCRS projections in its 2019 stock assessment this would (1) end overfishing within one year and would thereby maintain fishing mortality at or below FMSY in line with the Convention objectives while (2) also allowing the recovery of the stock by 2070 with a probability higher than 50%.*

LDAC recommendations

Statements from LDAC members

The LDAC member organizations from the **Spanish surface longline fishing fleets** (ORPAGU, OPP-07-LUGO, ANAPA-ARVI) do not agree with the SCRS recommendation made in 2019 on a prohibition of retention for all specimens as this would mean de facto a closing of the fishery with significant socio-economic impact for one of the fleet segments which are most contributing to improve data in terms of observer coverage and catch reporting. These organizations also feel that the TAC of 500t is not sufficient in terms of catch limit as this would mean a reduction which will become aggravated by the losses in markets occurring in 2020 as a result of the COVID-19 outbreak coupled with the implementation of unilateral measures in Spain setting catch limits as a result of its inclusion of CITES Appendix II, which in practice means an additional management measure for this fishery in the case of Spain.

The **EU pole and line supply chain representatives** (IPNLF) strongly supports a retention ban in line with the SCRS advice. Even with such a measure in place, by-catch will still occur and undermine recovery of this endangered species.

The **NGOs members of the LDAC** (led by Oceana and WWF) express concerns that the proposal put forward by the EU is not in line with management advice issued the SCRS, to introduce a full-retention ban without exceptions, in combination with by-catch mitigation measures. In regard to the EU Landing Obligation, the full non retention of shortfin mako could be established under article 4.a), which applies to species in respect of which fishing is prohibited. Furthermore, the EU proposal is unclear on how catch levels will be limited to 500t (as by-catch will continue to occur once CPCs have consumed their allocation) and how post-release mortality is taken into consideration. Therefore, the EU proposal, if adopted, is likely to not end overfishing, as required by the Convention objectives and the CFP, and fail to recover the stock, even if 2070 is used as a reference date.

Common position from all LDAC members

All LDAC members agree with the mandatory release of all mako sharks specimens caught alive in the context of all ICCAT fisheries, coupled with the gradual increase of observers coverage (physical or EMS) for monitoring catch of death specimens for CPCs involved in the fishery, both EU and particularly non-EU fleets, as well as additional measures in order to avoid certain catch levels.



EU proposal 2

In order to further refine the management measures and reduce mortality levels the SCRS will be required to advise at the earliest possible time, on the spatio-temporal identification of nursery areas/pupping grounds and on likely hotspots (areas of high concentration) and areas of permanent or seasonal bycatches and if spatio-temporal closures would be relevant to reduce encounter and mortality rates.

LDAC recommendations

Common position from all LDAC members

The LDAC fully agrees with this proposal and requests for the need to give a clear strategy and road map to SCRS to compile the best available scientific data both from the fishing industry and scientific organizations of CPCs, including ecological data and data on distribution and productivity.

In particular, the SCRS should be given a dedicated mandate to identify the hotspots (i.e. areas of high abundance and concentration) and areas of nursery/pupping grounds for makos. This might serve as a basis to propose and assess the effectiveness of technical measures such as spatio-temporal closed areas. In this sense, an independent expert and/or external reviewer could be appointed by SCRS and hired for this purpose by the EU or other CPCs if the SCRS has neither the time nor the resources for it.

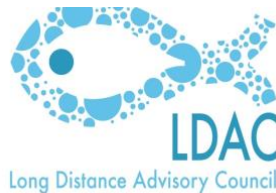
It would be important that SCRS would start working on this without further delay and call for a first intersessional meeting in spring 2021 at latest.

The LDAC would like to remind that the main purpose of the management measures is to reduce fishing mortality of mako sharks. Therefore, the SCRS should look at combined data of all fleet segments catching mako sharks and contributing to its fishing mortality, not only surface longliners but also for example gillnets from Morocco or recreational fisheries from the US.

Regarding scientific assessment, the LDAC would like to ask the EU to frontload the next North Atlantic mako stock assessment as soon as there is new reliable information and data. This would require revising accordingly point 18 of EU proposal which talks about 2027 as time plan. In the meantime, updates can also be accepted if the required data are provided by the concerned CPC.

Statements from LDAC members

The NGO group of the LDAC also proposes that a cap on fishing effort by the long-line fleets (through number of hooks, total number of lines on board, and immersion duration) shall be added as to limit the mortality and increase the rate of live shortfin makos being caught.



EU proposal 3

*This proposal also introduces a **protocol to ensure that best-handling practices** are being implemented by the fleets in order to maximise the release of fish caught alive.*

LDAC recommendations

Common position from all LDAC members

The LDAC supports the adoption of a protocol for safe handling practices to release alive individuals as well as the ongoing study on high survivability of these species.

EU proposal 4

In addition, this proposal also acknowledges that the reduction of fishing mortality should continue over time in light of new information or advice from the SCRS. In particular, it promotes the exchanges of relevant information and sharing of best practices between CPCs, with the involvement of scientists, managers, and crucially fishing operators whose knowledge about shortfin mako distribution and biology has not yet been fully exploited.

LDAC recommendations

Common position from all LDAC members

The LDAC notes that SCRS should be given a specific mandate. It is also advised that PA4 has a more detailed work plan for 2021 and incorporates additional data besides fisheries catch and landing, such as ecological, spatial distribution, behaviour, etc.

Statement from LDAC members

The LDAC members of the fishing surface longline fleet reiterate their full commitment and their buy-in into the management measures to reduce and bring down fishing mortality to sustainable levels in terms of conservation. In this sense, it must be reminded that the Spanish surface longline fleet is undertaking an action plan by producers, processors and traders of shark species through the Fisheries Improvement Project (FIP) BLUES.

The NGO group of the LDAC considers that, in order to ensure a full compliance from the EU fleet, it would be appropriate to establish a sampling plan for port controls for EU vessels outside EU waters targeting the fisheries (métiers) catching mako (and implementation via EU-Third Countries agreement) and the public dissemination of the annual control reports by MS.

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