



Bundesministerin für Ernährung,
Landwirtschaft und Verbraucherschutz
Frau Ilse Aigner

11055 Berlin

4 November 2011

Dear Federal Minister:

We are writing to convey our views with regard to 2012 European Union (EU) Total Allowable Catch (TAC) limits and prohibited species status for a suite of shark and ray species.

Shark and Ray TACs

Shark Advocates International¹ and the Shark Alliance² applaud the EU Fisheries Council for setting 2011 TACs for **spurdog** (*Squalus acanthias*) and **porbeagle** shark (*Lamna nasus*) at zero. Both of these species have been seriously overfished and remain classified as Critically Endangered by the International Union for Conservation of Nature (IUCN). TACs of zero are in line with advice from the International Council for Exploration of the Sea (ICES) and are necessary to remove all incentive to catch, directly or indirectly, these vulnerable sharks. Considering the exceptionally low rates of population increase associated with these slow growing species, we strongly support maintaining these strict limits (with no allowance for bycatch and requirements for prompt release) for the foreseeable future, especially 2012.

We note obligations and ICES advice regarding the development of recovery plans, which include bycatch mitigation measures, for spurdog and porbeagle, and ask for your assistance in encouraging the Commission to begin these key tasks.

In addition, we strongly support reduction in all EU **skate and ray** TACs by *at least* the levels proposed by the Commission. Precautionary action is warranted given the high uncertainty with respect to population status of individual species within these complexes, and the general biological vulnerability of skates and rays to overexploitation through targeted fishing and bycatch.

¹ Shark Advocates International is a project of The Ocean Foundation formed to provide leadership in shark conservation.

² The Shark Alliance is a coalition of more than 100 groups dedicated to improving shark policies.

Existing Species-Specific Prohibitions

We urge the continuation of prohibitions on fishing, retaining, transshipping, and landing, as well as requirements for prompt release, for:

- **basking sharks** (*Cetorhinus maximus*) in all EU & non-EU waters,
- **white sharks** (*Carcharodon carcharias*) in all EU & non-EU waters,
- **angel shark** (*Squatina squatina*) in all EU waters,
- **common skate** (*Dipturus batis*) in EU waters of areas IIa, III, IV, VI, VII, VIII, IX & X,
- **undulate ray** (*Raja undulata*) in EU waters of areas VI, VII, VIII, IX & X,
- **white skate** (*Rostroraja alba*) in EU waters of areas VI, VII, VIII, IX & X
- **guitarfishes** (Rhinobatidae) in EU waters of areas I, II, III, IV, V, VI, VII, VIII, IX, X & XII
- **porbeagle** in international waters.

Additional Species-Specific Prohibitions

We urge extension of the common skate, undulate ray, porbeagle, guitarfish, and white skate protections listed above to cover EU waters of the Mediterranean Sea, where these species are highly threatened. Also, angel shark protection should be extended to Critically Endangered for sawback (*Squatina aculeata*) and smoothback (*Squatina oculata*) species.

We stress that ICES stated last year that management measures are required for the Endangered **giant devil ray** (*Mobula mobular*) and Critically Endangered **sawfish** (*Pristis* spp.); Southern Europe and the Mediterranean should be the focus of EU conservation efforts for these exceptionally rare species.

Conclusion

The measures outlined above are fully consistent with the 2009 EU Plan of Action for Sharks and available scientific advice, and will help to continue to improve the EU's standing with respect to conservation and management of these vulnerable species.

Thank you for your consideration.

Sincerely,



Sonja Fordham
President
Shark Advocates International



Sandrine Polti
Policy Advisor
Shark Alliance