

8 December 2010



Ms. Stefania Prestigiacomo
Minister for the Environment, Territory and the Sea
Ministero dell'Ambiente e della Tutela del Territorio e del Mare
Via Cristoforo Colombo, N°44
147 Roma
Italy

Dear Minister Prestigiacomo:

We are writing to convey our views with regard to the 2011 European Union (EU) fishing opportunities to be deliberated at the December meeting of the EU Council of Ministers. Specifically, we appreciate your consideration of our requests with respect to Total Allowable Catch (TAC) limits and prohibited species status for a suite of shark and ray species, many of which are threatened with extinction.

EU Shark TACs

Shark Advocates International¹ and the Shark Alliance² strongly support the European Commission's proposal to set the 2011 TAC for **spurdog** (*Squalus acanthias*) at zero, as pledged last December, and to maintain the **porbeagle** shark (*Lamna nasus*) TAC 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. We also urge the Council to promote the development of recovery plans for these species as a matter of priority.

Prohibited species

Our groups also endorse the European Commission's proposals to maintain prohibitions on fishing, retaining, transshipping, and landing:

- **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 zones IIa, III, IV, VI, VII, VIII, IX & X,
- **undulate ray** (*Raja undulata*) in EU waters of zones VI, VII, VIII, IX & X,
- **white skate** (*Rostroraja alba*) in EU waters of zones VI, VII, VIII, IX & X, and
- **porbeagle** in international waters.

Such protection is clearly justified by these species' threatened status, and, in the case of basking and white sharks, their inclusion on the Appendices of the Convention on International Trade in Endangered Species (CITES) and the Convention on Migratory Species.

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.

We also strongly support the Commission's proposal to add **guitarfishes** (*Rhinobatidae*) to the list of prohibited species, although we urge extension of the affected areas to all EU waters and non-EU waters in order to include the Mediterranean Sea. Guitarfishes are warm water rays whose fins are particularly valuable for use in shark fin soup. Two species -- common guitarfish (*Rhinobatos rhinobatos*) and blackchin guitarfish (*Rhinobatos cemiculus*) -- are found in EU waters from Portugal south, including the Mediterranean, and south along west Africa where they are targeted for their fins; both species are classified by the IUCN as Endangered. In the Mediterranean, guitarfish were once common, but are now assumed locally extinct in some areas. ICES has noted these regional extirpations, the species' vulnerable life history characteristics, and intense fishing pressure in much of their inshore habitat (including off Greece), and has advised that "precautionary management measures are required." Full protection by the EU is therefore clearly warranted and urgently needed.

Other Endangered Rays Addressed by ICES but not the Commission

ICES states that "precautionary management measures are certainly required" for the **giant devil ray** (*Mobula mobular*). This Endangered species is found primarily offshore in the Mediterranean and adjacent parts of the Northeast Atlantic along the Iberian Peninsula to Senegal, including the Canary Islands, Madeira, and the Azores. Giant devil rays are subject to unsustainable bycatch in tuna and swordfish fisheries and are reported in the landings of Spain. Females of the species have only 1-2 pups per reproductive cycle. The giant devil ray has been listed on Annex II of the Barcelona Convention and Appendix II of the Bern Convention for more than a decade, and yet Malta is the only EU Member State to follow through with associated commitments to protect the species. For these reasons, we urge you to make the case for full EU protection for giant devil rays.

ICES also states that "protective management measures are required" for **sawfish**, in light of their Critically Endangered status, and recommends that all species (*Pristis* spp.) be made prohibited species to protect both vagrants in EU waters and animals encountered by EU fisheries in non-EU waters. Although the main range of sawfish in the eastern Atlantic is south of Europe, the northern limits of two species once extended to EU waters of the southern Iberian Peninsula and Mediterranean. Sawfish are among the world's most threatened; CITES listings alone are not sufficient to prevent their extinction. We urge you to propose full EU protection for these species.

Thank you for considering our views. We eagerly await the outcome of the meeting.

Sincerely,



Sonja Fordham
President
Shark Advocates International



Sandrine Polti
Policy Advisor
Shark Alliance