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Dear Ms. Garcia Silva:

Shark Advocates International appreciates this opportunity to comment on the current stage of Marine Stewardship Council (MSC) certification assessment for Atlantic swordfish and blue shark fisheries operated by more than 40 longline vessels represented by Organización de Palangreros Guardeses (ORPAGU) and the fishing Spanish Confederation, Confederación Española de Pesca (CEPESCA). Our comments are limited to fisheries for blue sharks (*Prionace glauca*).

We appreciate that the current comment period is aimed at soliciting stakeholder input with respect to use of the “Default Tree” in this assessment, yet we take this opportunity to offer broader concern regarding fundamental shortcomings that should prevent MSC certification, at least for now and the immediate future. While we also recognize the request for specific comments relating to individual performance indicators and scoring guideposts, we assert that certification of these shark fisheries would violate the higher MSC core principles.

Principle 3: Effective Management

Most clearly, Spanish fisheries for Atlantic blue sharks run counter to MSC Principle 3 regarding “Effective Management” in that they are not “subject to an effective management system that respects local, national and international laws and standards and incorporates institutional and operational frameworks that require use of the resource to be responsible and sustainable.” There is currently no mechanism to ensure the safeguards necessary “to respond to changing circumstances and maintain sustainability.”

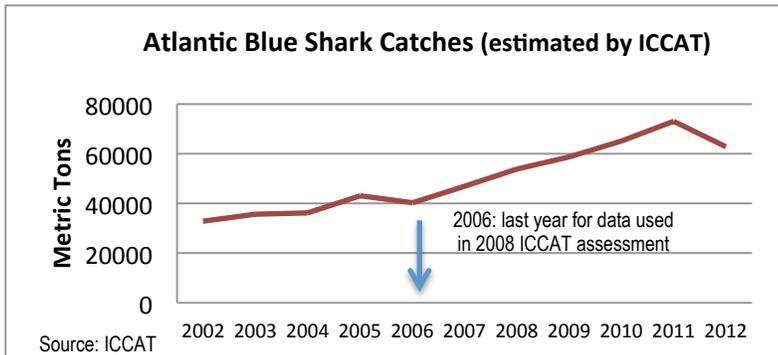
More simply, catches of highly migratory Atlantic blue sharks are not limited at the Spanish national, European Union (EU), or international level. Furthermore, to the best of our knowledge, the United States is the only country with vessels fishing in the Atlantic that has established a commercial quota for this species, one known to traverse entire ocean basins.

Whereas we applaud the EU for its particularly sound shark finning ban (which requires without exception the landing of sharks with fins still attached so as to facilitate proper enforcement and collection of species-specific catch data), Spain has a history of missing deadlines for submitting required reports on EU finning ban implementation.

Principle 1: Sustainable target fish stocks

We appreciate that blue sharks have relatively high reproductive rates when compared to other sharks, and thus are among the most promising shark species in terms of potential to support sustainable fisheries. There is much work to be done toward that goal, however, including not only national, EU, and international blue shark fishing limits, but also more robust assessment of Atlantic blue shark populations.

As you are likely aware, scientists affiliated with the International Commission for Conservation of Atlantic Tunas (ICCAT) conducted stock assessments for North and South Atlantic blue sharks in 2004 and 2008; the next such assessment will be completed later this year. Although most models used in the 2008 ICCAT stock assessment concluded that Atlantic blue shark stocks were not overfished and that over-fishing was not occurring, scientists warned that the quantity and quality of data were “quite uninformative” and did not provide a consistent signal to inform the models, leading to conclusions that were considered “very uncertain.”



It is worth noting that, since the 2008 assessment (which incorporated catch data through 2006), Atlantic blue shark landings have generally increased, with ICCAT’s 2012 estimated catches (62,909 t) nearly double those in 2002 (32,736 t).

These catches are almost entirely attributed to longline fishing. Vessels from Spain take the bulk of landings.

We stress that the aforementioned EU shark finning ban is aimed at preventing waste rather than controlling overall fishing mortality.

Principle 2: Environmental impact of fishing

There is ample, widespread concern about the incidental capture of endangered and protected species (such as sea turtles and albatrosses) as well as bycatch of unprotected, threatened sharks (such as shortfin makos) in longline fisheries. We can provide more detailed comment on these issues at a later stage in this process, should it proceed.

Thank you for considering our views. We look forward to continuing to offer stakeholder input.

Sincerely,

Sonja Fordham
President