

September 17, 2015

Kevin Stringer
Senior Assistant Deputy Minister
Ecosystems and Fisheries Management
Fisheries and Oceans Canada
200 Kent Street
Ottawa, Ontario
K1A 0E6



Dear Mr. Stringer:

On behalf of our organizations, we are writing to encourage the Canadian government to help ensure that next week's annual meeting of the Northwest Atlantic Fisheries Organization (NAFO) results in more responsible fisheries management for the region's elasmobranchs.

Our organizations maintain a special focus on shark, skate, and ray conservation due in large part to the low reproductive capacity that leaves most of these species exceptionally vulnerable to overexploitation. We are deeply concerned about the precarious status of these species caused by a lack of science-based fishing quotas and poor compliance with best practices.

Specifically, we urge the Canadian NAFO delegation to work to secure:

- adoption of a requirement for landing sharks with fins still naturally attached; and
- reduction in the NAFO skate total allowable catch (TAC) to no more than the level advised in advice from the NAFO Scientific Council (5,000t).

Given the important roles that elasmobranchs play in marine food webs, such actions also serve to support the application of an ecosystem approach as required in the amended NAFO Convention and Article 5 of the United Nations Fish Stocks Agreement.

A Science-Based Skate Quota

We remain seriously concerned about the status and management of thorny skate (*Amblyraja radiata*). This species has been classified by the International Union for Conservation of Nature (IUCN) as *Vulnerable* globally and *Critically Endangered* off the U.S. east coast, and has been designated a species of "special concern" by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC).

The NAFO Scientific Council has demonstrated that:

- Thorny skates have low resilience to fishing pressure due to low population growth rates;
- The Division 3LNO thorny skate population remains low and has shown little improvement under the NAFO management regime; and
- To improve the chances of recovery, 2016 skate catches should not exceed 5,000t (Div. 3LNO).

As you know, Canada holds a significant share of the NAFO skate TAC, and NAFO Parties have repeatedly failed to heed scientific advice for this limit. We believe Canada has not only a key role in negotiating quota reduction, but also an important responsibility to work to ensure the sustainability of this vulnerable species. Moreover, adherence to scientific advice is integral to Canada's stated approach to fisheries management.

An Enforceable Shark Finning Ban

We are pleased that the United States and the European Union are taking leadership in implementing and promoting prohibitions on at-sea shark fin removal as the best method for enforcing bans on shark finning (slicing off a shark's fins and discarding the body at sea). As they did last year and have done at other RFMO meetings, we are hopeful that these two Parties will soon propose to amend the NAFO finning with a ban on at-sea fin removal, which would significantly strengthen this region's only international safeguard for sharks, and underscore the precedent for other RFMOs set last year by the North East Atlantic Fisheries Commission (NEAFC). We strongly urge Canada to support such a change, without exception.

As detailed in a 2010 expert report from the IUCN Shark Specialist Group and the European Elasmobranch Association¹, under such a "fins-attached" policy:

- Enforcement burden is greatly reduced
- Information on species and quantities of sharks landed is vastly improved
- "High-grading" (mixing bodies and fins from different animals) is impossible.

The technique of making a partial cut (allowing fins to be folded against the body) can address industry concerns about safety and storage, and is being used effectively for frozen as well as fresh sharks. Because of the many practical advantages associated with the fins-attached method, the policy has been mandated by dozens of countries, and has been endorsed as best practice in international arenas, including the United Nations and the IUCN.

Conclusion

Setting the world's first RFMO TAC for an elasmobranch was a major accomplishment for NAFO, and yet we maintain that this limit must be in line with scientific advice in order to ensure population recovery and set a sound precedent for other RFMOs. Canada's active, supportive engagement is key to realizing that goal, as it is for NAFO adopting strong RFMO finning bans through best practice enforcement standards.

We are hopeful that, with your leadership, these important steps toward responsible elasmobranch fisheries management will be taken next week.

Thank you for your consideration.

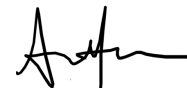
Sincerely,



Sonja Fordham
President
Shark Advocates International



Susanna Fuller
Marine Conservation Coordinator
Ecology Action Centre



Ali Hood
Director of Conservation
Shark Trust

¹ Fowler, S. and Séret, B. 2010. *Shark fins in Europe: Implications for reforming the EU finning ban*. European Elasmobranch Association and IUCN Shark Specialist Group.