

CONSULTATION on an EU Action Plan for Sharks

Response



Scottish Sea Angling Conservation Network (SSACN)

Antonio Fernandez-Aguirre
International Policy and Law of the Sea Unit
Directorate General for Fisheries and Maritime Affairs
European Commission
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Dear Mr. Fernandez-Aguirre:

The Scottish Sea Angling Conservation Network (SSACN www.ssacn.org) welcomes the opportunity to respond to the European Commission's consultation paper for development of a Community Plan of Action (CPOA) for Sharks.

SSACN is a sea angling conservation organisation which was established to lead a unified, coordinated and comprehensive approach to international, national and local conservation issues which may affect recreational sea angling in Scotland.

We feel that there is a need for greatly improved management of shark species in Scottish waters and indeed throughout the EU catching sectors; without improved controls, monitoring and inspection regimes we feel that most species will be reduced to levels from which they may not recover.

We would like to reinforce the point that the Commission should always have an obligation to ensure the 'Best Value' socio-economic return from any fish resource rather than focusing and favouring commercial fishing interests; preserving the biodiversity of the seas is far more important than short term economic gain.

Best Regards

Steve Bastiman
Chairman – SSACN
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Scottish Sea Angling Conservation Network (SSACN)

SSACN (www.ssacn.org) are generally supportive of the three proposed objectives, however, we would like to see a fourth objective which recognizes overall socio-economic value and not just benefit to the catching sector.

This objective should address the impact on the recreational interests associated with sharks and be targeted at ensuring the optimum economic return, or '**Best Value**', of the common resource.

For any plan to be successful it must result in a true ecosystem based management system which does not give any one stakeholder more than natural benefit. To achieve this the following high level areas should be addressed :

Until such a plan is in place, we feel the following should be undertaken as a matter of priority :

- Fishing limits based on ICES advice.
- Precautionary approach should be the rule.
- Zero catch on those species denoted "critically endangered" on the IUCN Red list.
- Minimise bycatch levels
- All sharks and rays are landed whole
- An end to the special permits and a tightening up of the loopholes which allow finning
- Any Consultations should include all interested recreational and conservation groups as well as the commercial sectors.

Best Value

When considering each of the Objectives and 'Fields of Action', consideration should be given as to whether or not each is delivering the best socio-economic value for all EU citizens.

As most species can be almost irreversibly affected by overfishing, the only prudent course of action to maximise long term and sustainable economic benefit from shark fishing, is through the precautionary, science-based restrictions.

A prerequisite of this is that quality scientific advice and precautionary measures are developed in a timely manner; as has been seen many times in the past, the social and economic impacts of not collecting data and restricting catches will be substantial with the consequent mismanagement of the species.

Without this up front effort and on-going controls, monitoring and inspection regimes we feel that most species will be reduced to levels from which they may not recover, this will of course impact all commercial and recreational fisheries as well as tremendously impact the marine biodiversity.

Sea angling

From a sea angling point of view, Sharks offer anglers a challenge few other species are capable of, consequently they are much sought after by recreational anglers who generally fish for them on a catch and release basis.

Recreational sea angling is a major provider of jobs throughout European coastal countries , it supports many tourism and service industries from hotels and camp sites to tackle manufacturing and shop staff and such direct activities as bait suppliers and charter boat skippers.

Many of these jobs are often in coastal communities with fragile economies and where there is little scope for diversification for either employment opportunity or economic activity.

In Scotland sea angling contributes £150+ million to the Scottish economy, a figure comparable or greater than any catching sector; the shark fishing sector alone accounts for around £40 million.

SSACN would like to make the following observations on the proposed Fields of Action.

Field of Action #1 - Facilitate improved species-specific catch and landings data and monitoring of shark catches.

Species-specific data on shark catches is sorely lacking and increased data collection is essential to maintain the integrity of the Action – it needs to address all aspects of landings and discards, whether undertaken at sea or in port, in fact we strongly favour a move to landings only be allowed at certain nominated ports.

With respect to recreational catches – it is especially important to distinguish between 'captures' and 'mortality' – most recreational sea anglers return their catch alive, in fact, in many cases the fish are tagged in order to add to the volume of scientific knowledge.

These tagging exercises are generally voluntary efforts such as the one being run as a cooperative effort between SSACN, sea anglers and the UK Shark Tagging Programme. They should be given funding support in order to quickly extend the programmes and the data gathered.

Field of Action #2 – Facilitate the identification and reporting of species-specific biological and trade data.

It is essential that Observer/Sampling schemes provide representative coverage of all fleet sectors.

Species / commodity level recording of all landings and trade of shark fins, meat and oil should be recorded separately and should apply to landings from all vessels in EU waters, internal EU trade and all EC vessels worldwide. This is essential to support FOA #3.

Field of Action #3 – Compile the necessary information to assess threats to shark populations, determine and protect critical habitats, and implement harvesting strategies consistent with the principles of biological sustainability and rational long term economic use.

We consider it highly important to study and protect key habitats where sharks tend to be concentrate, for example, the critically endangered Common Skate in the Oban area of Scotland is thought to be a resident population of just a few thousand fish.

This small population would soon be eradicated if unconstrained commercial fishing were to take place; on the other hand, it has supported a vibrant recreational fishery for over 20 years.

The region also holds a unique resident population of the critically endangered Spiny dogfish which until recently were being targeted in their gravid stage by a commercial longliner.

A similar recreational shark fishery used to exist off the south west coast of England until commercial pressure reduced stocks to the level where neither a commercial nor a recreational fishery could survive.

A zero catch for Porbeagle and other sharks could in the short term impact catching sector revenues, but it would open up the development of the lucrative, environmentally friendly and sustainable recreational fisheries.

Given this breathing space, stocks would have had a chance to recover, and then with a suitable management plan in place, there would then be the option to re-open the catching sector.

Field of Action #4 – Develop research projects to assess threats to shark populations and implement harvesting strategies consistent with the principles of biological sustainability and rational long term economic use.

We strongly support all research programmes aimed at conserving any species of fish, whether protected or not, and would encourage the use of non-traditional research sources.

We would also like to reiterate that we are currently coordinating a tagging programme for spiny dogfish (see <http://www.ssacn.org/spurdog-tagging-programme/>) and encourage you to provide support to volunteer programmes such as these.

Field of Action #5 – Improve and develop frameworks for establishing and coordinating effective consultation involving stakeholders in research, management and educational initiatives within and between States.

We strongly support these actions; “stakeholders” should not be restricted to the catching sector as this obviously results in a skewed opinion, conservationists, recreational anglers, scientists, consumers, divers, tourists and interested members of the public should naturally be included.

Building on #4, the supporting of end-user generated educational outreach initiatives to develop, support and communicate 'Best Practice' shark handling methods and techniques would help minimise the impact of the recreational fisheries.

Field of Action #6 – Adjust fishing effort to the available resources.

Must be an absolute goal - sharks are particularly vulnerable to excessive fishing pressure; excessive fishing capacity, fishing in key habitats, lack of strong policies and their poor enforcement (as with other fisheries) are all combining to ensure the failure of the fishery .

The optimum economic return, or '**Best Value**', of the common resource should consider the significant contribution of the non-catching sector, even to the point of giving it more weight in order to allow stocks to recover.

Field of Action #7 – Adjust catches to the available resources.

Again, unless this goal is 'cast in stone' it will be totally non-effective. Limiting the catch of sharks is the **ONLY EFFECTIVE** way of preventing shark population decline, fishery collapse, and species extinction

As so little is known regarding absolute stocks and exploitation levels at the moment precautionary restrictions are necessary to safeguard shark populations while the scientific advice is developed.

All fisheries with high bycatch levels should be prioritized for new measures aimed at increasing gear selectivity and consideration of size limits (minimum, maximum, and slot) and restrictions on fishing gear.

We strongly support the establishment of time/area closures for breeding, nursery or other such activities when sharks gather and become vulnerable to targeted fishing.

Field of Action #8 - Minimize waste and discards from shark catches in accordance with article 7.2.2(g) of the Code of Conduct for Responsible Fisheries requiring the retention of sharks from which fins are removed and encourage the use of dead sharks.

All finning and derogations should cease – no exceptions.

Field of Action #9 – Identify and provide special attention in particular to vulnerable or threatened shark stocks.

Special and urgent protection should be enforced for all threatened shark species, especially those species considered by IUCN ***Endangered or Critically Endangered***