

Pro Wildlife · Engelhardstrasse 10 · D-81369 Munich

Frans Timmermans
Vice President of the EU Commission
Rue de la Loi / Wetstraat 200

B-1049 Brussels

Munich / Heusenstamm, 16 September 2021

Dear Vice-President Timmermans,

Pro Wildlife and Sharkproject are seriously concerned about the EU's position at the International Commission for the Conservation of Atlantic Tunas (ICCAT) regarding the conservation of endangered and seriously overfished shortfin mako sharks, especially in the North Atlantic. The European Union has been responsible for 50-80% of the total mako catch in the North Atlantic since 2000 and has blocked an immediate retention ban at ICCAT since 2017. The EU's position is in contradiction to:

1. the recommendation of ICCAT's Scientific Body, the Standing Committee on Research and Statistics (SCRS), that since 2017 recommends an immediate and full retention ban for mako sharks in the North Atlantic to provide at least a 70% probability for rebuilding of this severely overfished stock by 2070.
2. the EU's successful initiative to get mako sharks listed on Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in 2019,
3. the negative opinion of the EU's CITES Scientific Review Group, who in December 2020 decided, not being able to make a Non-Detriment Finding (NDF), to stop any imports of North Atlantic mako sharks from the High Seas by January 2021. Such an NDF is necessary for any international trade in CITES Appendix II species.
4. the EU Commission's ambitious Biodiversity Strategy 2030, stating that "*marine resources must be harvested sustainably.*" Continuing the landing of an already overfished stock and preventing a successful stock rebuilding can certainly not be described as "sustainable harvesting"
5. the European Parliament's Resolution on the Biodiversity Strategy 2030, stressing that "*by-catches of sensitive species should be eliminated or reduced to a level that allows full recovery.*"

Instead of supporting an immediate retention ban without exemptions the EU Commission's delegation at ICCAT has proposed a Total Allowable Catch (TAC) of 500 tonnes for the North Atlantic. In January 2021, the EU even set a unilateral TAC of 288 tonnes of mako "bycatch" for its own fleet for the North Atlantic for 2021 – despite the EU SRG's negative opinion, which had been published only a few weeks before. This was a disastrous signal to EU Fisheries, as insider reports from

Portuguese fisheries shockingly indicate: Since the SRG's Negative Opinion for North Atlantic mako sharks from the North Atlantic, deeming the introduction from the High Seas at all EU ports as illegal, fishermen are now obviously labelling all landed mako sharks as "caught in national waters" to be able to continue marketing this commercially valuable species circumventing the CITES and SRG decisions. Landings however appear to remain at a similar level overall as last year.

Thereby the case of the endangered shortfin mako shark in the North Atlantic alarmingly illustrates how the EU's position at ICCAT is at risk to undermine the efforts and weight of the EU's own conservation bodies but also may put severe damage on the European Union's international reputation and credibility as a driving conservation force.

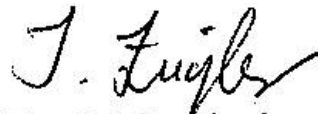
We therefore sincerely hope that the EU will reconsider its position ahead of the upcoming Commission Meeting of ICCAT on November 15th and then support the joint proposal from Canada, the United Kingdom, Senegal, Ivory Coast, Gabon, Guinea Bissau, the Gambia and Chinese Taipei for an immediate retention ban in the North and a TAC of 2001t for the South in order to prevent this stock from following a similar trajectory as in the North. This would be in the spirit of the new EU Biodiversity Strategy.

Thank you very much for your support in this urgent matter and we are looking forward to your response ahead of the upcoming ICCAT meeting. We are happy to provide more background details, if needed.

Yours sincerely,



Andrea Höppner
Director
Pro Wildlife
EU Transparency Register: 285805825014-46



Dr. Iris Ziegler
Head International Cooperation
Sharkproject International
EU Transparency Register: 706271239562-82