













November 10th, 2023

Dear Heads of Delegations to ICCAT,

Blue sharks are at high risk of overfishing in all oceans, primarily due to their significant overlap with industrial longline fisheries operations and their inherently lower reproductive rates compared to tunas and other target species. As a result of industrial fishing over the last 50 years, the spawning biomass of both Atlantic stocks has nearly halved.1

While tuna stocks and many other species are now subject to comprehensive management procedures at most RFMOs, similar measures have not yet been initiated for commercially exploited blue sharks despite their economic importance. This long overdue omission should be corrected immediately. Even more so as the 2023 ICCAT stock assessment highlights the threat both stocks are exposed to. The stock in the South Atlantic is subject to overfishing and the stock in the North Atlantic stock is at risk of being already overfished.

As conservation organisations, we are concerned about the continued overexploitation of blue sharks, targeted without adequate and suitable management. The absence of comprehensive management procedures, critical for ensuring the long-term sustainability of these removals and for maintaining populations at levels to perform their vital role in marine ecosystems, we call on the Commission to act. We urge that ICCAT comply with its commitment to the sustainable management of tuna and tunalike species, leveraging demonstrated competence in managing migratory and oceanic shark species, and apply a precautionary approach to the adoption of TACs for both stocks.

We therefore call on the Commission in 2023 to

- task the SCRS to provide, by 2025, options for candidate management procedures with the associated limit, target, and threshold reference points for the management of this species in the ICCAT Convention area.
- reduce the TACs for both the North and the South Atlantic so that the probability of both stocks being in the green quadrant of the Kobe plot is at least 60% throughout the projection period until 2033.
 - For the North Atlantic stock, the TAC should be set no higher than 20,000 tonnes in order to bring the stock into the green Kobe quadrant with at least a probability of 60% by 2026.
 - For the South Atlantic stock, the TAC should be set at 25,000 tonnes so that the stock has at least a 60% probability of staying in the green quadrant throughout the next ten years. The future TAC should be allocated among the CPCs as foreseen in Rec 19/08.2
- work through the Compliance Committee to ensure all CPCs comply with ICCAT's reporting requirements for sharks and fully report discards (dead and alive) as required by ICCAT Recommendations 2004-10 and 2007-06, as well as all other applicable resolutions and recommendations.3

² ICCAT Rec 19/08

³ ICCAT Rec 04/10, Rec 07/06, Rec 11/15, Rec 18/06

Background

ICCAT has previously pioneered the adoption of management measures for several other shark species. Following the uncertain outcome of the 2015 stock assessments, ICCAT set TACs for both blue shark stocks in 2019 as a precautionary measure.

However, till to date no HCRs have been proposed, although the SCRS was mandated already back in 2016 to develop "in the light of the results of the next stock assessment of blue shark [...], if possible, options of HCR with the associated limit, target and threshold reference points for the management of this species in the ICCAT Convention area," and this has been reiterated in Recommendation 2019/07 and Recommendation 2019/08. In addition, since adoption in 2019, the precautionary TAC of 28,923 tonnes for the South Atlantic has been exceeded by more than 15% every year due to the absence of an allocation key.⁴

In summary, ICCAT continues to treat blue sharks as a bycatch species instead of recognising that they are a target species for which comprehensive management procedures should be developed.⁵

The results of the blue shark stock assessments in 2023 show that urgent action is needed.

- The 2023 stock assessment indicated a 49.7% probability of the **North Atlantic stock** being in the green quadrant of the Kobe plot (i.e. not overfished and not subject to overfishing), while there is a 49.6% probability of the stock being in the yellow quadrant (i.e. overfished but not subject to overfishing). The SCRS advise that "the Commission reduces the current TAC to catch levels that will maintain the stock in the green quadrant of the Kobe plot with a high probability". ⁶
- The 2023 assessment showed that the **South Atlantic stock** was not overfished in 2021 but is subject to overfishing, i.e. has a 46.5% probability of being in the orange quadrant of the Kobe plot, while the probabilities of being in the green quadrant and the red quadrant (i.e. overfished and subject to overfishing) are 44.7% and 8.02%, respectively. The SCRS concludes that "recent catches (2019-2021; 34,983 t mean catch) are [....] not sustainable in the long term [and indicates] that catches of 27,711t (the estimated 2021 MSY) or less will immediately stop overfishing".⁷

⁴ ICCAT Report of the Standing Committee of Research and Statistics, 26-30 September 2022; p. 233f

⁵ ICCAT Rec 2015/0

⁶ ICCAT Report of the Standing Committee of Research and Statistics, 26-30 September 2022; p.231

⁷ ICCAT Report of the Standing Committee of Research and Statistics, 26-30 September 2022; p. 232