SCIENTIFIC COMMITTEE
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Letter on behalf of and in coordination with Shark Advocates International

WCPFC-SC8-2012

WWF[1]

[1] WWF in coordination with Shark Advocates International, Project AWARE and Wildlife Shark Advocates International Project AWARE Humane Society International

August 12, 2012

David Itano, Convenor
Ecosystems and Bycatch
WCPFC Scientific Committee
Kaselehlie Street, Kolonia
Pohnpei State, 96941
Federated States of Micronesia

Dear Dr. Itano:

We understand that experts at the Eight Regular Session of the Scientific Committee for the Western and Central Pacific Fisheries Commission (WCPFC) will consider recommending a study into the technical issues related to the shark fin to carcass weight ratios that are used for enforcing prohibitions on shark finning. We take this opportunity to highlight that this topic has been thoroughly addressed in a number of technical studies in recent years.

Specifically, in April 2012, the *Journal of Fish Biology* published a special issue on "The Current Status of Elasmobranchs: Biology, Fisheries and Conservation" that includes two papers about shark fin-to-carcass ratios.

1) Experts focusing on blue shark *(Prionace glauca)* fin to carcass ratios in Spain[1] found:

- Varying fin sets and fin cutting techniques result in significant differences in fin-to-carcass ratios across fleets and even among vessels;
- There are problems with using such ratios to enforce finning bans;
- Requiring EU fishermen to land all sharks with fins still naturally attached to bodies would facilitate proper, cost-effective enforcement as this policy is the *"most reliable method for preventing undetected finning";* and
- Landing sharks with fins attached can improve shark catch data by easing carcass identification to the species level.

2) Scientists at the University of British Columbia Fisheries Centre conducted a global review of species-specific fin to body weight ratios and relevant legislation[2]. Authors report that:

- Mean and median wet fin to body mass ratios were 3% and 2.2%, respectively;
- The 5% ratio is too high, meaning that *"current legislation provides an opportunity for fishers to harvest extra fins from more sharks without retaining all of the corresponding shark carcasses"*;
- The generalized 5% ratio used in existing regulations presents a *"dangerous loophole";*
- Species and/or fleet-specific ratios are not a practical solution due to difficulties associated with high-grading and accurate species identification;
- Requiring all sharks be landed with fins attached is the best way to close finning loopholes; and
- makes it is *"easier for trained observers at landing sites to record the number, mass and species of sharks landed, making data collection and monitoring more straightforward and accurate."*

These new papers draw heavily from and support the findings of previous expert reports produced by the European Elasmobranch Association (EEA) and the International Union for Conservation of Nature (IUCN) Shark Specialist Group.

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[1] Santana-Garcon, J., Fordham, S. and Fowler, S. (2012). Blue shark *Prionace glauca* fin-to-carcass-mass ratios in Spain and implications for finning ban enforcement *Journal of Fish Biology*. DOI:10.1111/j.1095-8649.2012.03233.x

[2] Biery, L. and Pauly, D. (2012). A global review of species-specific shark fin to body weight ratios and relevant legislation. *Journal of Fish Biology*. DOI: 10.1111/j.1095-8649.2011.03215.x

In particular, a 2010 study on shark fins in Europe[3] concluded that:

- Setting different ratios for different species and/or fleets, in addition to requiring much of research, would be costly, time-consuming and particularly difficult to implement; and
- Prohibiting the removal of shark fins on board vessels is the "*only fail-safe, most reliable, least expensive means to prevent finning and measure compliance; this method is viable for freezer vessels and can facilitate the collection of much-needed, species-specific catch data.*"

An extensive 2007 EEA study[4] concluded that:

- A fin to carcass ratio is a complicated and inadequate tool for preventing finning because of differences in fin cutting techniques and variability among shark species' fin sizes and values;
- Setting ratios at the upper end of (or above) scientifically derived ratios exacerbates this problem and leaves species with small fins and/or low value meat at particular risk of finning;
- Lack of information and inconsistency in fin removal prevent scientific determination of a single optimal ratio; and
- To ensure finning cannot take place, sharks should be landed with their fins attached.

The above mentioned analyses back up the ultimate conclusion of a 2006 assessment of the validity of the 5% fin-to-carcass ratio[5] from a collective volume of scientific papers produced by the International Commission for the Conservation of Atlantic Tunas:

"*The only guaranteed method to avoid shark finning is to land sharks with all fins attached.*"

Making a partial cut (allowing fins to be folded against the body) can address industry concerns about safety and storage.

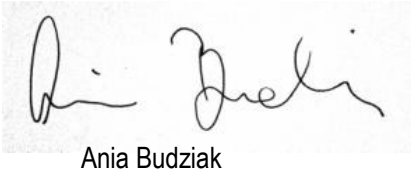
Because of the numerous practical advantages associated with the fins naturally attached method, the policy has been mandated for most Central American and U.S. fisheries, and internationally.

In order to combat finning and facilitate the collection of species-specific shark catch data in the Western and Central Pacific, we will continue to call for an WCPFC requirement that sharks be landed with their fins still naturally attached and hope that the Scientific Committee will review the substantial available information on this topic and recommend the same way forward.

Thank you for considering our views.

Sincerely,

Sonja Fordham
President
Shark Advocates International



Ania Budziak
Associate Director
Project AWARE

Rebecca Regnery
Deputy Director, Wildlife
Humane Society International

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[3] Fowler, S. and Seret, B. (2010). *Shark Fins in Europe: Implications for Reforming the EU Finning Ban*. At http://cmsdata.iucn.org/downloads/sharks_fins_in_europe_implications_for_reforming_the_eu_finning_ban_pdf/.

[4] Hareide N. R., Carlson J., Clarke M., Clarke S., Ellis J., Fordham S., Fowler S., Pinho M., Raymakers C., Serena F., Seret B. and Polti S. (2007). *European Shark Fisheries: a preliminary investigation into fisheries, conversion factors, trade products, markets and management measures.* European Elasmobranch Association.

[5] Cortes, E. and Neer, J. A. (2006). Preliminary reassessment of the validity of the 5% fin to carcass weight ratio for sharks. *ICCAT Collective Volume of Scientific Papers* 59, 1025–1036.