

## Recommendations on elasmobranch (shark and ray) management and conservation for the European Commission's Action plan to conserve fisheries resources and protect marine ecosystems



By: iSea (Greece), APECE (Portugal), SharkTrust (EU & UK), SUBMON (Spain), Sharklab-Malta, Marine & Environmental Research (MER) Lab (Cyprus) and Dutch Elasmobranch Society (Netherlands)  
13 May 2021

We welcome the opportunity to contribute to the public consultation on the *Action plan to conserve fisheries resources and protect marine ecosystems* that will be part of the EU Green Deal strategy. We specifically welcome the 1<sup>st</sup> and 2<sup>nd</sup> objective of the strategy that focus on the need to decrease the bycatch of endangered and threatened species, as well as the need to ensure fisheries management measures in MPAs have a positive impact on the conservation of threatened species.

As organisations focussed on the management of elasmobranchs we stress the urgent need to implement the objectives the EU and its Member States signed up to in the 2009 Community Plan of Action for the Conservation and Management of Sharks<sup>1</sup> (CPOA-sharks). We call on the Commission to ensure the new Action plan has the strength to deliver much needed actions listed in the CPOA-sharks are followed through.

Elasmobranchs are among the most vulnerable marine species. A recent study published in Nature showed that the global population of pelagic sharks has decreased by over 70% in the past 3 decades<sup>2</sup>, this decline is almost exclusively driven by unsustainable fisheries. In Europe at least 40% of shark and ray species are threatened with extinction<sup>3</sup>. With little effort to decrease fishing mortality. To curb this negative trend, more effort is needed to better protect these species and to effectively manage the fisheries that impact upon them.

The EU acknowledged more needed to be done to protect elasmobranchs when it adopted the CPOA-Sharks in 2009. This Action Plan sets out management targets for that, if adhered to, would ensure European elasmobranch populations could flourish. The action plan was reviewed by STECF<sup>4</sup> in 2019 and the conclusions of the independent scientific panel were that hardly any of the objectives had been met, and more effort was needed to effectively manage and protect elasmobranchs in Europe. To date many species still have no management measures or catch restrictions associated with them, only the most endangered species have a catch prohibition under the Technical measures regulation / TAC & Quota regulation but this is not linked to any conservation, protection or rebuilding measures.

<sup>1</sup> European Community Action Plan for the Conservation and Management of Sharks; <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52009DC0040&from=EN>

<sup>2</sup> Pacoureau, N. et.al; Half a century of global decline in oceanic sharks and rays. Nature; 589, 567-571(2021) <https://www.nature.com/articles/s41586-020-03173-9>

<sup>3</sup> European Red List of Marine Fishes, European Union, 2015, [https://ec.europa.eu/environment/nature/conservation/species/redlist/downloads/European\\_marine\\_fishes.pdf](https://ec.europa.eu/environment/nature/conservation/species/redlist/downloads/European_marine_fishes.pdf)

<sup>4</sup> Scientific, Technical and Economic Committee for Fisheries (STECF) – Review of the implementation of the shark finning regulation and assessment of the impact of the 2009 European Community Action Plan for the Conservation and Management of Sharks (STECF-19-17) <https://publications.jrc.ec.europa.eu/repository/handle/JRC119051>

To ensure the sustainable management of sharks and rays in Europe the new *Action plan to conserve fisheries resources and protect marine ecosystems* should at least include the following:

- Stock assessments for all elasmobranch species caught as target or bycatch in EU fisheries, with associated funding to bridge knowledge gaps
- An obligation to have a conservation and management plan for all species on the prohibited species list with the aim to rebuild populations to healthy levels
- EU to champion shark conservation in Regional Fisheries Management Organisations, advocating for fins attached policies in all RFMO's, and strictly following scientific advice on catch limits.
- Binding targets for member states on the ambition for protection of essential habitats for shark and ray species in their Nature2000 / MSFD sites

The European Green Deal was introduced as a transformative agenda, a clean break with past policies that focused too much on economic gains and left little room for nature and the environment. The integration of previous species and habitat action plans into an ambitious overarching action plan fits into this strategy, and should lead to an accelerated and high ambition agenda. Sharks and rays of Europe deserve nothing less.

For further information, please contact:

Irene Kingma

Strategy and Policy lead – Dutch Elasmobranch Society

[kingma@elasmobranch.nl](mailto:kingma@elasmobranch.nl)

*About iSea - [www.isea.com.gr](http://www.isea.com.gr)*

iSea is a not-for-profit Non-Governmental Organisation founded in March 2016 in Greece, with the aim to preserve, protect and restore the precious heritage of the aquatic environment. The organisation consists of a team of young and more experienced scientists and professionals of various disciplines from marine biologists, to specialists in environmental management and educators. The organisation strives to shed light on the foremost issues affecting our oceans and propose alternatives for a sustainable future. The organisation activities focus on four main pillars: fisheries, invasive species, marine litter and human and aquatic ecosystems and uses tools like research, citizen science, education and public awareness. iSea has developed several collaborations with various entities both nationally and internationally, in the context of all the activities and projects that are being conducted.

*About Associação Portuguesa para o Estudo e Conservação de Elasmobrânquios (APECE) - [www.apece.pt](http://www.apece.pt)*

The Portuguese Association for the Study and Conservation of Elasmobranchs (APECE) was founded in January 1997. It is a non-profit voluntary organisation whose goal is promoting elasmobranch research and conservation, and is a member of the EEA and Shark Alliance. APECE is now supported by 150+ members, primarily students and academics. It issues a newsletter, delivers frequent seminars on shark conservation, provides students with career guidance, and provides accurate information on elasmobranch issues to the media in Portugal. Multiple scholarships have been awarded to students conducting research on elasmobranchs. APECE is actively engaged on multiple global issues, such as lobbying against finning and studying large pelagic movement patterns through satellite tracking.

*The Shark Trust - transparency register ID : 78610009998-13 – [www.sharktrust.org](http://www.sharktrust.org)*

The Shark Trust was established in 1997 as a registered wildlife charity. It is the UK member of the European Elasmobranch Association (EEA) and collaborates with other EEA members to promote the study, management and conservation of sharks, skates and rays in British, European and international waters. Its objectives are similar to those of the EEA – the introduction of management for shark, skate and ray fisheries, reduction of bycatch in other fisheries, increased levels of biological and ecological research effort, the conservation and management of critical areas and habitats (e.g. breeding and nursery grounds), promotion of international conservation and research

initiatives, and enactment of legal protection for threatened species under national legislation and international conventions (for migratory species). To achieve these goals, the Trust aims at increasing public awareness of the conservation problems faced by the elasmobranchs. It does so through its newsletter Shark Focus, published three times a year, and intends to work with commercial fishermen, recreational sea anglers, divers, yachtsmen, public aquariums, and all other interest groups and individuals interested in the conservation and management of elasmobranchs. It is active in international elasmobranch conservation through its participation in the EEA network and by advocacy to the UK government, and is beginning to support international research and conservation programmes.

*About Sharklab – Malta - [www.sharklab-malta.org](http://www.sharklab-malta.org)*

Sharklab – Malta is a registered non-profit, voluntary organisation in Malta dedicated to research, education and raising greater awareness about all chondrichthyan fishes (sharks, skates, rays, and chimaeras) around Malta and within the Mediterranean Sea.

Sharklab – Malta is undertaking many different activities to try and play a part in making a difference for elasmobranchs in the Mediterranean Sea. Our main objectives are to increase scientific knowledge, promote a better conservation and raise awareness about these magnificent animals. We are collecting catch data from the market in Marsa to gain more information on the range of species caught and brought to the islands. We are, through snorkeling and dive searches, observing species and looking more closely at the habitat around the islands, where years ago many more species used to thrive. We are educating the public through presentations, conversations and social media.

*About SUBMON – Spain - [www.submon.org](http://www.submon.org)*

SUBMON is a non-profit organisation that, since 2003, has developed projects focusing on different aspects of research, awareness and conservation offering a comprehensive array in the development of projects related to the conservation and management of the marine environment.

SUBMON is made up of a multidisciplinary team of specialists and professionals, who apply their technical knowledge in the fields of conservation biology and medicine, and to establish sound environmental education and awareness strategies, always related to the marine environment. SUBMON has been counselling and carrying out different studies for several national and international governmental authorities, research institutes and education centres and also collaborates as external veterinary consultant in national and international programmes working on the mitigation of the effect of fisheries on protected species. Marine stewardship agreements are a key innovative methodology developed by SUBMON where different stakeholders (government, municipalities, local fishing companies, sailing and diving clubs) and end users of marine areas are involved in their conservation via long term binding commitment and contribution with conservation, monitoring and management actions.

*About Nederlandse Elasmobranchen Vereniging / Dutch Elasmobranch Society (NEV) -  
transparency register ID : 14211885135-08 - [www.elasmobranch.nl](http://www.elasmobranch.nl)*

The Dutch Elasmobranch Society was founded in 2010 as a follow-up to the Netherlands group of the EEA. The main goal of the Society is: the conservation and protection of sharks and rays by promoting scientific research, education and advocacy, with a focus on species in Dutch waters and the waters of Dutch Overseas Countries and municipalities. We try to achieve this by:

- Designing, implementing and supervising research on cartilaginous fishes;
- Commitment to sustainable management of cartilaginous fish populations, sustainable fisheries and protection of the marine fauna at a national and international level;
- Creating awareness about elasmobranch and their environment;
- Providing advice on shark and ray research, policy and decision making