

Statement for the Compliance Committee Meeting of ICCAT 2023

Ecology Action Centre, Shark Trust, The Ocean Foundation

We thank the Compliance Committee for the opportunity to participate in this process, including through our July submission (Circular 7689/2023) reviewing **CPC's shark check sheets and catch data submissions**. This review was conducted by the Shark League coalition as part of a thorough analysis of CPC's performance with respect to various shark data and conservation obligations under both ICCAT and the Convention on International Trade in Endangered Species (CITES).

The review highlights many CPCs for a lack of required details as well as vague, inconsistent, or contradictory information in their shark check sheets and for potential discrepancies in their Task 1 species reporting.

We thank Costa Rica and the European Union for the responses to our submission (refer to COC 312) and we invite other CPCs to consider our evaluation and related efforts to improve implementation of CPCs' obligations as a complement to other reviews by the Secretariat and COC.

We are pleased to see some significant improvements in CPCs' 2023 shark check sheets.

In particular, check sheets were received from CPCs that had never submitted one before or hadn't done so for many years. At least 12 countries significantly improved their answers by clarifying or citing domestic regulations implementing shark retention prohibitions and the 5% fins-to-carcass ratio limit.

Several CPCs without ICCAT or large scale pelagic vessels have nonetheless newly demonstrated compliance, citing specific domestic measures and reporting artisanal catch.

We stress, however, that much improvement toward shark measure compliance and reporting through the check sheet process is still urgently needed.

Most important, many CPCs still lack the required binding domestic shark fishing restrictions. Some fail to report on such policies in sufficient detail to demonstrate compliance with the related ICCAT measure. Opaque answers require close reading to even understand what some CPCs are trying to convey.

In addition, a great number of CPCs, despite repeated COC guidance, continue to include invalid answers to excuse their lack of compliance. For instance, many CPCs continue to state that a given shark species is not targeted, found in their waters or present where their fleets fish even though the SCRS has not yet granted exemptions on these bases. Most concerning are the several cases where the range of the species in question clearly overlaps with the CPC's waters.

The check sheet answers also continue to suggest confusion among CPCs regarding application of ICCAT shark obligations, in terms of vessels and fisheries.

We therefore ask the COC to further clarify for CPCs that:

- there is an obligation to provide details on domestic regulations for the implementation of all ICCAT measures, including every shark Recommendation; and
- reporting of this policy information, as well as Task 1 catch data is required for all fisheries (including industrial, small-scale, and recreational fishing), even when sharks are caught incidentally and/or discarded.

The COC should also elaborate guidance on domestic implementation, data reporting, and shark check sheet details for:

- CPCs without active ICCAT vessels active, and
- ICCAT-managed shark species caught in artisanal and/or inshore fleets, and non-pelagic gear.

Last, a clear process needs to be developed by COC and the SCRS, as per Rec 18-06, to validate any CPC exemption requests for reporting based on species or population range.

We look forward to this year's CPC-by-CPC shark compliance review and the opportunity CPC's to address outstanding concerns and continue improving compliance processes.