

Subject: Detailed Explanation by Namibia for Exceeding Shortfin Mako Catch Limit as per ICCAT Recommendation 22-11

Dear [ICCAT Representative],

Namibia acknowledges that our 2023 landings of Shortfin Mako (*Isurus oxyrinchus*) totalled 522 tonnes (refer to figure 1), exceeding the ICCAT catch limit of 256 tonnes by 266 tonnes. We provide the following points for clarity on this over-catch, alongside the context of national policies and conservation efforts in place.

Referring to COC_304_REV_2 - Landing Reported Data (Figure 1)

SOUTH ATLANTIC SHORTFIN MAKU/ REQUIN-TAUPE BLEU DE L'ATLANTIQUE SUD/MARRAJU DIENTUSO DEL ATLÁNTICO SUR						
YEAR	Retention allowance		Current catches	Balance	Adjusted Retention allowance	
	2023	2024	2023	2023	2023	2024
Total Retention Allowance	1295	1295				
ANGOLA	2.00	2.00	0.00	2.00		
BELIZE	15.00	15.00	0.00	15.00		
BRAZIL	208.00	208.00	0.00	208.00		
CHINA	2.00	2.00	0.00	2.00		
CHINESE TAIPEI	61.00	61.00	2.00	59.00		
CÔTE D'IVOIRE	18.00	18.00	0.00	18.00		
CURACAO	0.00	0.00				
EL SALVADOR	0.00	0.00	0.00	0.00		
EU	503.00	503.00	0.00	503.00		
GUATEMALA	0.00	0.00				
JAPAN	62.00	62.00	4.40	57.60		
KOREA	4.00	4.00	0.00	4.00		
NAMIBIA	256.00	256.00	522.00	-266.00		-10.00
PANAMA	0.00	0.00	0.00	0.00		
SENEGAL	8.00	8.00	0.00	8.00		
SOUTH AFRICA	154.00	154.00	95.99	58.01		
UK	0.00	0.00	0.00	0.00		
URUGUAY	2.00	2.00	0.00	2.00		
TOTAL CATCH			524.00			
Rec. number	22-11	22-11			22-11	22-11

1. Catch Limit Overrun:

- ICCAT Recommendation 22-11 set a limit of 256 tonnes for Shortfin Mako landings in 2022.
- Namibia landed 522 tonnes in 2023, resulting in an over-catch of 266 tonnes.

2. National Laws on Discards:

- Namibian law prohibits discarding any dead fish, including Shortfin Mako, meaning all deceased catches must be retained and landed.
- This regulation impacts how Namibia can manage shark catches, as we are legally obligated to land all deceased Shortfin Mako rather than discarding them at sea.

3. Implemented Measures to Reduce Landings:

- To comply with ICCAT’s objectives, Namibia instituted specific measures:
 - All live Shortfin Mako sharks hauled back during fishing operations are released back into the sea;
 - Only dead individuals are retained and landed, in adherence to Namibian anti-discard laws
 - Additionally, the vessels licensed by Namibia have been instructed to avoid areas where they encounter higher catches of Shortfin Mako;
 - It should be noted that these measures were only implemented by Namibia in Jun/Jul of 2023, therefore the impact of the measures only reflects half of the reduced catch effort implemented.
 - The expected live releases for 2024 are expected to be higher than that of 2023.
- Figure 3 in this report illustrates that Namibia made consistent efforts since the adoption of recommendation (22-11) to minimize landings of Shortfin Mako by adhering to this selective retention approach.

Referring to 2024_SCRS_REV_ENG

Namibia’s Landing Data (2012-2023) in tons (Figure 2)

CPC	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
NAM	586	9	950	661	799	194	980	0	945	637	789	545

Namibia’s Live Releases Data (2019-2024) in tons (Figure 3)

CPC	2019	2020	2021	2022	2023	2024
NAM	0	0	0	0	97.75	168.2

*2024 figures are from January 2024 till October 2024

4. Discards Across all the CPCs:

- Data from the 2024_SCRS_REV_ENG report reveals notable high discard reported:
 - Namibia recorded zero discards due to our national laws prohibitions.
 - Other CPCs reported discards of Shortfin Mako with these combined discards increasing year on year and getting close to the total retention allowance for all CPC’s set by Recommendation 22-11 (Total retention allowance 1,295t). (Refer to Figure 4 for reported discards)

Referring to 2024_SCRS_REV_ENG

Total discards (2019-2023) in tons (Figure 4)

CPC	2019	2020	2021	2022	2023
All	52	64	641	780	1,083

5. Conclusion

- It should be noted that should Namibia's National laws allowed for discards, Namibia would have reported a total Landing of Shortfin Mako of Zero and would not have been in this position.