AMERICAN ELASMOBRANCH SOCIETY

May 18, 2021

Paul Doremus Acting Administrator for Fisheries National Oceanic and Atmospheric Administration SSMC3, Room 15424 1315 East-West Highway Silver Spring, Maryland 20910



Dear Dr. Doremus:

On behalf of the American Elasmobranch Society (AES), the world's pre-eminent professional organization of shark and ray scientists, I am writing to draw your attention to our recent Resolution (included below) urging the United States (and Mexico) to heed urgent scientific advice for North Atlantic shortfin make sharks through domestic protections and an international retention ban under the International Commission for Conservation of Atlantic Tunas (ICCAT).

As you are likely aware, most sharks and rays exhibit life history characteristics (slow growth rate, late maturity and few young) that make them especially susceptible to overfishing and slow to recover from a depleted state. Unfortunately, these species have been generally low priorities for fisheries research and management, leading to many cases of overexploitation and even population collapse. With a dedicated Conservation Committee and annual Resolutions, the AES aims to add our perspective to the shark and ray fisheries management debate in hopes of supporting the formation of effective, science-based measures for these vulnerable species.

Shortfin make shark protection was one of two priority matters that our society chose to address at our annual business meeting, held virtually in July 2020. This Resolution was considered thoroughly by interested AES members; no objections were voiced during associated discussions. We shared the Resolution with the NOAA ICCAT Commissioner last October; we understand that ICCAT was unable to reach make management decisions during its 2020 annual (virtual) meeting. Given the resumption of ICCAT make negotiations in the coming weeks, as well as recent changes in NOAA leadership, we respectfully resubmit our Resolution for your consideration.

Thank you for your attention to this pressing matter.

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Sincerely,

David A. Ebert, Ph.D.

President

cc: Alexa Cole, Director, NOAA Office of International Affairs and Seafood Inspection Randy Blankinship, Chief, Atlantic Highly Migratory Species Management Division

Resolution regarding North Atlantic Shortfin Mako Sharks

TAES

American Elasmobranch Society July 2020

WHEREAS the U.S. and Mexico are Parties to the International Commission for the Conservation of Atlantic Tunas (ICCAT), ranking 4th and 10th, respectively, for landings of North Atlantic shortfin make sharks (*Isurus oxyrinchus*);

WHEREAS shortfin makes have ranked third among 20 pelagic elasmobranch stocks in terms of vulnerability to Atlantic longline fisheries in Ecological Risk Assessments conducted for ICCAT;

WHEREAS ICCAT shark scientists in 2019 found that the overfished North Atlantic shortfin population is subject to continued overfishing, will decline for at least the next 15 years, needs substantial reductions in fishing mortality to begin rebuilding, and is projected to be unable to recover by 2070 under ICCAT's current (2017) management measure;

WHEREAS the ICCAT scientists found that an annual total catch of zero (including discards) has a 53% probability of rebuilding the population by 2045, and recommend that ICCAT prohibit retention of North Atlantic shortfin make sharks, as it has for other shark species;

WHEREAS ICCAT scientists noted that shortfin make post-release survival can reach 75%, indicating a prohibition can be particularly effective at achieving significant reductions in mortality;

WHEREAS Canada recently banned retention of shortfin makes in domestic Atlantic fisheries and proposed the same action under ICCAT, in concert with fifteen other Parties, in 2019;

WHEREAS Mexico has yet to limit make catches or publicly express a position on ICCAT proposals for shortfin make limits; and

WHEREAS U.S. opposition was a key factor in ICCAT's failure to reach consensus on the 2019 science-based shortfin make proposal, leaving the declining, vulnerable North Atlantic population without any international catch limits.

THEREFORE BE IT RESOLVED that the American Elasmobranch Society urges the U.S. and Mexican governments to act on clear and urgent scientific advice for North Atlantic shortfin make sharks by prohibiting retention domestically and supporting the same action under ICCAT as part of 2020 virtual negotiations.