

April 15, 2004

Dear EU CITES Authorities & Fisheries Ministers

On behalf of the undersigned members of the Species Survival Network (SSN) we are writing to respectfully urge your government to support Germany's proposals to include Spiny dogfish and the Porbeagle sharks in Appendix II of the Convention on International Trade of Endangered Species (CITES).

The conservation status of these two shark species is of particular concern because both have seen very large population declines in recent years and their populations continue to be threatened by international trade in their meat, fins and other body parts worldwide. As it stands, this trade poses a significant threat to wild populations. The lack of data on the trade, especially in porbeagle, only serves to delay the implementation of needed conservation and regulatory measures.

In the North Atlantic, heavy overfishing has reduced spiny dogfish populations by 75% in the last ten years alone, with overall declines as high as 95%. Fisheries data indicate similar population declines in other regions as well. In 2003, the World Conservation Union (IUCN) listed the spiny dogfish as "near threatened" worldwide and "vulnerable" to "endangered" in the North Atlantic. Adequate fisheries management is lacking in most places where this highly migratory species travels. Where management does exist, it has proven woefully inadequate to stop population declines and ensure the long-term viability of the species.

Evidence indicates that porbeagle sharks are also experiencing significant and ongoing population declines in the North Atlantic. Globally, porbeagle sharks are listed as "Near Threatened" on the 2003 IUCN Redlist, but the Mediterranean and North Atlantic stocks are more seriously threatened.

The principal global threat to both of these species is overfishing, including both targeted fisheries and bycatch. This threat is exacerbated by the fact that spiny dogfish and the porbeagle sharks are slow-growing, late maturing species with a low reproductive rate and a resultant low rate of population growth. The problem is particularly acute for the spiny dogfish, because fisheries disproportionately target the mature females critical to sustaining the species. The combination of these biological characteristics makes it difficult for either species to recover after being over-fished, thus increasing their vulnerability and the likelihood of further population declines while unregulated exploitation and trade continues.

The European Union is a driving force in the international trade of spiny dogfish and porbeagle sharks. As the largest market for spiny dogfish, with over 65% of the retained catch, the European Union has a vested interest in the long-term sustainability of this species and should show its support for conservation efforts by co-sponsoring Germany's

listing proposal. porbeagle sharks are also a highly valued commodity throughout the EU, and, as such, the EU should make a more concerted effort to ensure that these sharks are managed in a sustainable manner.

An Appendix II listing could help address the uncontrolled exploitation of these species by helping to bring unsustainable international trade under control. In addition, Appendix II listings for these sharks would provide critically needed information on the exploitation, trade and status of these species, while helping ensure their long-term survival. It would not, however, cause problems for the EU fishing fleets catching these species, since consumption is essentially domestic. On the contrary, these added protection measures would substantially contribute to the protection of these vulnerable shark species for the future and help to maintain a natural balance in the marine ecosystems of which they are an important part.

At its most recent meeting, the Shark Working Group established by the CITES Animals Committee acknowledged that both the spiny dogfish and the porbeagle shark appear to meet the requirements for CITES Appendix II listing. CITES listings for these species are also wholly consistent with the FAO International Plan of Action for the Conservation and Management of Sharks. We are asking the governments of the European Union to demonstrate the political will to put these much needed protections in place. Without the improved management and regulatory resources that the Appendix II listing would garner, we can only expect the populations to continue to decline.

The leadership of the European Union is crucial in this endeavor. We thank you for your attention to this important matter.

Sincerely,

Daniela Freyer
SSN European Bureau

On behalf of the following Members of the Species Survival Network, including many members of the SSN Fish Working Group

ASMS OceanCare, Switzerland
Animal Welfare Institute, USA
Born Free Foundation, United Kingdom
Born Free, USA
Co-Habitat, United Kingdom
Deepwave - The Initiative for the protection of the high seas, Germany
Defenders of Wildlife, USA
Earthtrust, USA
Gesellschaft zur Rettung der Delfine, Germany
Hawaii Audubon Society / Pacific Fisheries Coalition, USA
Humane Society International, Australia

IFAW - International Fund for Animal Welfare, USA
IWC - International Wildlife Coalition, USA
The Last Great Ape Organization, Cameroon
National Council of SPCAs, South Africa
Pro Wildlife, Germany
RSPCA - Royal Society for the Prevention of Cruelty to Animals, United Kingdom
Society for the Conservation of Sea Mammals - GSM Denmark
WDCS – Whale and Dolphin Conservation Society, Germany
WildAid, USA
WSPA -World Society for the Protection of Animals, United Kingdom