

July 9, 2024

Matthew J. Strickler  
Deputy Assistant Secretary  
for Fish and Wildlife and Parks  
Department of the Interior  
1849 C Street, NW  
Washington, DC 20240



Dear Deputy Assistant Strickler:

As grantees of the Shark Conservation Fund (SCF) and in anticipation of the thirty-third meeting of the CITES Animals Committee (AC33), we write to follow up on related discussions at the recent meeting of the SCF Board. Specifically, we underscore our strong support for improving CITES data by eliciting information about where traded sharks and rays were caught, in line with recommendations from the 2023 Shark League analysis<sup>1</sup> of International Commission for Conservation of Atlantic Tunas (ICCAT) Parties' performance with respect to obligations for CITES-listed sharks and rays.

As you are likely aware, the CITES Secretariat has since put forth for AC33 several options for making such a change by simply amending trade reporting guidelines to include shark and ray catch location (at least by ocean basin), noting that the associated burden on Parties would be minimal.

Reporting shark and ray exports only by country hinders analysis of trade patterns and compliance with obligations associated with both CITES and international fisheries measures. Because national and regional fishery restrictions vary across the globe, the lack of ocean-specific information makes it difficult to evaluate the legality of fishing operations from which shark and ray products originate.

From a domestic perspective, eliciting shark and ray catch location data can aid in the conservation of highly threatened populations that the U.S. shares with other countries. For example, the proposed reporting changes can yield information that is vital in efforts to:

- Combat illegal fishing of **oceanic whitetip sharks** (*Carcharhinus longimanus*), in line with Endangered Species Act (ESA) Draft Recovery Plan goals;
- Evaluate compliance with ICCAT safeguards for ESA-listed **scalloped hammerheads** (*Sphyrna lewini*) by Mexico and Central American countries;
- Fill substantial gaps in understanding the global exploitation of under-studied yet exceptionally vulnerable mobula rays, including the ESA-listed **giant manta** (*Mobula birostris*);
- Determine the source of reported spikes in trade of **bigeye threshers** (*Alopias superciliosus*), the shark species that ranked first in a groundbreaking National Marine Fisheries Service-led Ecological Risk Assessment and was subsequently prohibited under ICCAT; and
- Enhance the effectiveness of ICCAT measures for valuable **shortfin makos** (*Isurus oxyrinchus*).

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<sup>1</sup> Fordham, S.V., Hood, A.R., Arnold, S.J., Kachelriess, D., and Lawson, J.M. 2023. Bridging the Gaps that Hinder Shark Conservation: An analysis of ICCAT Parties' policies for CITES-listed Atlantic elasmobranchs. The Shark League. London.

For these reasons, we urge the U.S. delegation to AC33 to take a leadership role in ensuring that the AC advances the establishment of CITES reporting of shark and ray catch location data (along with other beneficial initiatives, including Stage 2 of the Review of Significant Trade for all 14 shark and ray species/country combinations).

Thank you again for briefing the SCF Board on your agency's efforts to protect these remarkable and irreplaceable species and for considering our perspective on this potentially game-changing improvement in their global conservation.

Sincerely,



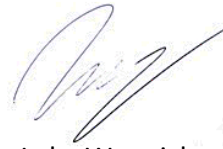
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cc: Dr. Rosemarie Gnam, FWS Division of Scientific Authority  
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