



POSITION PAPER

EUROPEAN CITICENS INITATIVE:

'Stop Finning – Stop the trade'

A trade law to end the EU trade of loose shark fins



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* There is no financial or other incentive for the authors to make claims that do not align with the most robust scientific evidence.



Introduction

As The ECI Stop Finning - Stop the Trade has progressed to public hearings and debate, it has become necessary to address some of the statements that have been presented by the Fishing Industry's representatives. With this document we provide the most current and accurate data available to clarify misrepresented facts and further emphasize the many reasons why a fin trade regulation is needed. The EU aims to be "front runners in promoting conservation and sustainable management of sharks worldwide" ([EU, Oceans and fisheries](#)). However, knowing that the shark fin trade is the major driver of overfishing globally, these conservation goals are greatly diminished by the fact that the EU is a major supplier of shark fins, with 45% of fin supplies to Taiwan, Hong Kong and Singapore coming from the EU. ([DG Trade](#)). The EU also committed to ambitious goals with the European Green Deal, the High Seas Treaty, the Cop 15 Biodiversity and Cop 19 CITES agreements.

The format of this document first shows the statements made by the designated European industry representative before the European Parliament, followed by counter arguments and supporting data.

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Statement: "Feeding the world with sustainable Shark"

'Feeding the world'

Shark meat caught in the EU does not contribute to its food security. According to the [joint research center of the EU](#), global consumption of fish equates to 143.8 million tonnes per year. The [ICCAT declared landings](#) (page 255 of the report) of the EU of sharks did not even comprise 0.0005 % of this number. However, global shark fin exports are declining, while the EU proportion of the trade continues to rise. "There is now not only an opportunity, but a responsibility, for the EU to track, manage and sustainably limit the export of numerous species currently threatened or commercially exported and likely to become threatened without trade management" ([FAO - IFAW, 2022](#)).

However, as a keystone predator, sharks play a significant role in providing ecosystem services and ecological functionality which directly impacts fish populations ([Ferretti et al., 2010](#)). **Therefore, removing sharks from ecosystems will have a negative impact on food security.**

'Sustainable Shark'

It is important to highlight that the main concern of the 'European Citizen Initiative' is that there is no practical solution to ensure that threatened or protected species are not traded, if shark fins are traded loosely. The initiative is not aiming to ban shark fishing, but the end of the trade of loose shark fins (specifically HS Code: 030392, 030571 and 160418). Even if individual shark species could be fished within sustainable yields, this argument does not address the problematic nature the loose shark fin trade has on allowing illegal trade of protected or endangered species.

With this said, it should be highlighted that maximum sustainable yield models work under the assumption that species populations follow a logistic growth. This means that the population should double within one generation, allowing for yields within this generation to be caught. However, this population doubling time is very high for sharks. For example, maturity of blue sharks is commonly reached at 4 – 5 years, which give the species a high vulnerability according to [fish base](#).

Furthermore, there is a large under representation of shark bycatches, especially of blue sharks. This makes sustainable models inaccurate ([Oliver et al., 2015](#)). Increasing extinction risks of individual shark species are difficult to measure. **Since 1970, the global abundance of oceanic sharks and rays has declined by 71% because of an 18-fold increase in relative fishing pressure. Because of this depletion three-quarters of oceanic sharks and rays are threatened with extinction** ([Pacoureau et al., 2021](#)). In this, according to [the WWF](#), the EU continues to be a major source of legally obtained fins, and by fuelling the global market it contributes to the worsening of the overall situation.



Statement: "The European fleet has never practiced finning"

According to the expert working group on review of the implementation of the shark finning regulation and assessment of the impact of the 2009 European **there were 14 cases of reported non-compliance with the Fins Naturally Attached Policy from four EU countries in the reports evaluated for the period 2014-2018**. Furthermore, port inspections, which are still relatively low in most MS with Spain having e.g., reported only 708 inspections for 41,603 landings of sharks with a volume of 50,934 tons while the United Kingdom had inspected almost all of its more than 11,000 landings. An analysis of the reported data from one member state shows that more than 70% of the landings occurred outside EU waters. However, inspections were only carried out in EU ports, although a majority of shark landings by EU member states happen in ports outside of EU.

Vessels which were none compliant with the FNA regulation, which were apprehended outside of the EU jurisdiction include the Spanish Flagged ANGELO PRIMERO in 2016, the BAZ in 2017, CEDES in 2018, VIRXEN DA BLANCA in 2018, the SESIMBRA in 2022, the PLAYA DEL RIL in 2017 and 2022 and the Italian flagged EIGHTEEN in 2017. These vessels were mainly apprehended through the work of non-governmental organisations (NGOs). **It is unlikely that all of these vessels would have been apprehended without these NGOs and it is therefore very likely that there are more European vessels which operations have not been monitored sufficiently to ensure compliance with the FNA regulation (STECF, 2019)**. Furthermore, some vessels avoid European legislation through so called 'flags of convenience'. For example, the Spanish owned MONTECELO is flagged to El Salvador and was apprehended in 2017 for the failure to declare by-catch and discarding of endangered species.

It is worth noting that all the apprehensions mentioned above occurred after the Fins Naturally Attached policy came into force. With this policy the European Union recognises that shark finning has been an issue within the European fleet in the past. Trade data also demonstrates that the EU and particularly Spain have been an important exporter of shark fins before the FNA regulation came into force (Shae and To, 2017). Studies on fin-to-carcass-mass ratio analysis in Vigo came to the same conclusion (Santa-Garcon et al., 2012 and Hareide et al., 2007).

Statement: "There has never been an infringement of the EU fleet"

Vessel infringements involving EU vessels.

While there are several examples of the EU fleet engaging in Illegal, Unreported and Unregulated (IUU) activity (Annex 1), it is also important to highlight that a substantial amount of none-EU flagged vessels hold European ownership. These vessels commonly operate outside of the European jurisdiction making it difficult for the EU to enforce its fishing regulations and prevent IUU fishing. As highlighted above this is especially true for the landings of sharks (STECF, 2019).



Article 10 of EU Regulation 1224/2009 and SOLAS regulation V/19

Not a single ICCAT authorized EU-flagged Purse Seiner or Longliner transmits consistently on AIS.

The average transmission rate ranges between 39.5% (Spain) - 60.8% (France) for Purse seiners and 75.4 – 77.1 % for longliners operating in the Atlantic.

According to the International Convention for the Safety of Life at Sea (SOLAS) regulation V/19 all ships of 300 gross tonnage and upwards engaged on international voyages should carry an AIS unit. The regulation requires that AIS shall 'provide information - including the ship's identity, type, position, course, speed, navigational status and other safety-related information - automatically to appropriately equipped shore stations, other ships and aircraft.' The EU is signatory of this convention (Article 10 of EU Regulation 1224/2009). They additionally require fishing vessels of 15 meters to transmit on AIS (Article 6a and Annex II, part I, of directive 2002/59/EC and EU commissions directive 2011/15/EU). Furthermore, engagement of IUU fishing is much more likely when vessels are dark. The transmission gaps of most fleets occurred disproportionately often in proximity to EEZ boundaries, which could have enabled vessels to engage in fishing activities in areas where they are not allowed.

Statement: "We value, we trade and eat the shark meat"

Market Dynamics of shark meat

According to ICCAT, the landing of sharks (especially from Spain) only started in 1997. The shark meat was then traded (figure below), making Spain the largest trading country of shark meat globally. Shark meat is generally considered to be a lower-value commodity compared to shark fins, which are highly sought-after in many Asian markets for use in shark fin soup. As a result, the price of shark meat can be quite low in some markets. In some cases, shark meat may sell for as little as \$0.1 per kilogram, depending on factors such as the species of shark, the quality of the meat, and the level of demand.

Spain used to import all of its shark meat from other major shark-fishing countries, with foreign fishing vessels landing a significant amount in Spanish ports. The introduction of anti-finning legislation has increased the supply of shark meat, which is not necessarily related to market demand. Previously, fishing vessels could discard sharks to save hold space and fill it with more valuable species. The new regulations require them to reserve more space for shark carcasses, leading to an increase in the supply of shark meat. As a result, some vessels that used to target other species exclusively now focus solely on sharks. This development may explain the opposing trends seen in imports and exports of shark meat from 2002 to 2012 – a drop in import volume of 18 percent, to 14 351 tonnes in 2012, and an 80 percent rise in export volume, to 21 426 tonnes, over the same period ([FAO, 2015](#)). **Conclusively, shark meat demand only increased through the FNA regulation.** However, now the EU is a major player in the global trade in shark and ray products, including meat and fins. According to the WWF, the EU accounted for around 22% of the global trade in shark and ray meat in 2019. **This makes the EU an important contributor to the overexploitation of shark populations**, particularly given the ongoing concerns about the sustainability of shark fishing practices in many parts of the world ([Porcher and Darvell, 2022](#)).



The Countries at the Center of the Shark Meat Trade

Countries exporting the highest value of shark meat 2009-2019 (in USD)



Source: WWF



statista

The use of misleading names for shark meat can prevent consumers from making informed decisions about their food choices.

Shark meat is in most European countries sold under false names misleading the public and demonstrating that these products are not valued. Common names, under which [shark meat is sold](#) are for France Chiens, Saumonette, Petite Roussette, Grande Roussette, Taupe, Veau De Mer, in Germany Schillerlocke, Seeaal, Kalbfish or Speckfish, in Italy Palombo, Smeriglio, Gattucci, Spinaroli, Cani Spellati Vitello Di Mare or Pesce Spada and in the UK Flake, Huss, Rock Salmon, Rigg. It is important to note that these are just examples, and the mislabelling is also commonly found in other countries ([Pazartzi et al., 2019](#) and [Hobbs et al., 2019](#)). **This deceptive labelling of shark meat can leave consumers unaware of what they are really eating and is a strong indicator that Europeans do not value shark as a food source.** In addition to growing public awareness about the importance of sharks in marine ecosystems, there is also a significant deterrent to consuming shark meat due to its high levels of toxic substances that tend to accumulate in sharks at the top of the food chain, such as mercury.



Statement: "From a nutritional point of view the meat of the shark is a healthy and cheap protein, that does not have problems."

While proteins are an important part of a healthy diet, there is no deficiency of it in Europe. Studies even exclude Europe when looking at global future trends for Protein Deficiencies, as there is no risk associated to sustaining protein intake in the member states ([Medek et al., 2017](#)).

More importantly, the consumption of 100 g blue shark meat exceeds the European Food Safety Authorities tolerable weekly intake (TWI) value of 1.3 µg/kg body weight for mercury ([EFSA, 2012](#), [Kibria and Harron, 2015](#)). The global bioaccumulation data (Tables 1 and 2) **it is apparent that the pollutant load in sharks is considerable, in particular the presence of PCBs and mercury may make these organisms susceptible to long-term toxic effects** (Storelli et al. 2003). The most recent study on the mercury content of blue sharks concluded: "**Significant percentages of [the blue shark] samples were above the safety level for Hg in seafood for human consumption (Commission Regulation (EC) No 1881/2006), the consumption of blue shark may be detrimental for human health.** Moreover, as sampled blue sharks in this study were juveniles and medium sized adults and knowing that Hg has a robust relationship with body size, this may raise a serious concerns since half of the wild shark population could exhibit higher concentrations than those found in the present study." ([Riesgo et al., 2023](#)) Other studies focusing on the human safety of blue shark consumption came to the same conclusion and recommended against the commercialisation, especially of larger individuals ([Alves et al., 2023](#), [Biton-Porsmoguer et al., 2019](#) and [Kim et al., 2019](#)).

Statement: "The management of RFMOs guarantees the sustainable management of shark species"

To date EU shark fisheries have no comprehensive management framework either at European or Regional Fisheries Management Organization (RFMO) level, and the European Action Plan for Sharks is outdated and lacks SMART targets ([Niedermüller et al., 2021](#)). While RFMOs can play an important role in promoting sustainable management of shark species, it is unlikely that they can guarantee it on their own. A more comprehensive and coordinated approach to shark conservation is needed that includes a range of measures, such as improved data collection and monitoring, stronger regulations and enforcement, and efforts to reduce demand for shark products ([STEF, 2019](#)).

Furthermore, the RFMO is not in the position to ensure sustainable management of shark species, as it does not hold enforcement capabilities on such topics, especially in the high seas. **RFMOs have a purely advisory role**, most have management powers to set catch and fishing effort limits, technical measures, and control obligations. These are mainly covering specific species, such as tuna, but do not sufficiently extend to sharks on any of the management powers mentioned ([EU, Oceans and Fisheries, 2023](#)). While Finning is prohibited in most RFMOs, the regulations rarely go beyond the FNA regulation. There are a few exceptions, such as prohibition of direct fishing or live release policies for specific species (e.g., the porbeagle shark).



Based on data reported to the Food and Agriculture Organization (FAO) and tuna regional fishery management organizations (t-RFMOs), 189,783 metric tons of blue shark were legally caught and landed in 2019, amounting to over 7 million blue sharks. Large-scale commercial fleets, mainly longliners, harvest 90% of blue shark catches, and distant-water fishing nations catch 74% of the global blue shark catch. At the very least, **blue shark landings were estimated to total \$411 million, exceeding the catch value of each of the three iconic bluefin tuna species. Unlike the southern bluefin tuna which has a full RFMO dedicated to it, there is no RFMO dedicated to the conservation and management of any oceanic shark** ([Oceana, 2022](#)).

Statement: "If protected shark species are accidentally caught, they are returned alive with very high chances of survival"

The post-release fate of discarded sharks is largely unobserved. In addition, quantifying total shark mortality from bycatch is challenging because comprehensive data on these discards are unavailable and difficult to obtain.

The mortality of sharks after release varies depending on the species. Differences in mortality rates can also be a result of fishery characteristics, handling, and the temporal period of monitoring fate ([Cosandey-Godin and Morgan, 2011](#)). Only a small proportion of shark catch records contain data on size, capture and release conditions, handling, trailing gear, and hooking location ([NOAA, 2021](#)). **However, the main problem is that accidentally caught threatened species in longlining don't have to be released in most areas and can be retained.**

Statement: "The European fleet mainly fishes for blue- and short fin mako sharks" and "Blue shark catch represent over 95 % of the landings"

Landings of sharks are mainly recorded in general shark groups and not to species level when aggregated for submission to the FAO (Cashion et al., 2019). Therefore, it is unlikely that such a statement is based on robust and peer reviewed data. **According to the FAO, 80 % of the catches from longline distant water fleets comprise of blue shark and '10 percent shortfin mako, but oceanic whitetip, silky, thresher, hammerhead, and porbeagle sharks are also taken'** ([PEW – EU Shark Conservation, 2014](#)).



Statement: "The stock of blue shark is in good health in all the oceans"

Blue sharks (*Prionace glauca*) dominate both the fin trade (41%) and shark meat trade (36%). **Despite being considered one of the most abundant and resilient shark species, their populations are thought to be decreasing, with their decline intrinsically linked to the lucrative shark fin and growing shark meat trade.** The International Union for Conservation of Nature (IUCN) now categorizes the global population of blue sharks as "Near Threatened" and the Mediterranean population as "Critically Endangered" ([Capell et al., 2022](#)).

The FAO reports that global shark catches have tripled since 1950, peaking in 2000 with a record high of 868,000 tons. However, since then, there has been a noticeable downward trend with catches in 2018 reaching approximately 680,000 tons, about 22% lower than the peak. This decline in catches could be attributed to various factors, including shark conservation measures. **In many cases, the reduction in shark catches is unintentional and is a consequence of the overall declining abundance of exploited sharks. This, in turn, results in reduced yields even when the fishing effort remains constant or increases.** ([FAO, 2020](#)). Catch limits for the South Atlantic are consistently exceeded by over 10% as catch allocation have not been agreed ([ICCAT, 2019](#)). The Indian Ocean's stock is currently unlikely to be overfished but catches may be higher than estimated. The Scientific Committee warns that a resulting 20% catch increase will harm stock sustainability ([IOTC, 2022](#)).

While it is true that stock assessments evaluate the blue shark not to be overfished the populations have been difficult to assess due to limited data and modelling options, making projections for their stocks nearly impossible. **The 2015 stock assessment for blue sharks in the North and South Atlantic oceans by the International Commission for the Conservation of Atlantic Tunas (ICCAT) and Fisheries and Resources Monitoring System (FIRMS) of the Food and Agriculture Organization (FAO) show that stock status for all pelagic shark species remains uncertain.** This makes it difficult to detect stock depletion to levels below the convention objective level. Despite progress in the quantity and quality of data available, results are still uninformative and do not provide a consistent signal for assessment.

It is also important to note that the industry representative failed to explain during the public hearing that the latest scientific information he showed for the Pacific refers to a stock assessment for blue sharks in the North Pacific based on data from 1971 to 2015 and thus almost 10 years old, and that in [2019 CMM 19-08 from the latest stock assessment for the Atlantic](#) notes that the estimates obtained with the *state-space surplus* production model formulation were generally less optimistic, predicting that the stock could be overfished and overfishing could be occurring in some cases.

Statement: "(loose) shark fins be differentiated, and fins easily be distinguishable " and "The blue metallic colour of blue sharks make visual identification possible"

During the shark fin ban in the UK 'the difficulty to identify species (and thus endangered species) from dried shark fins' was highlighted as a major concern to why a shark fin ban is necessary to ensure the protection of these species ([UK Gov., 2021](#)). As shown in the figure below, difficulties in accurate species identification are imposed in shark species due to morphological similarities ([Hernandez et al.,](#)



2010), especially when processing (Figure 2) occurs before the fins are traded (Cardenosa et al., 2023). Multiple studies highlight the importance of DNA testing for the identification and the high costs involved (e.g., Ibarra, 2020, Domingues et al., 2021). This includes the blue shark, as **the fins lose the blue metallic colour when dried or frozen**. The traceability of the fins with regards to their origin and species can therefore not be ensured.



Figure 1 | Image of three different shark fins. Left Dusky Shark (pectoral fin), middle Blue Shark (dorsal fin) and right Silky Shark (pectoral fin)



Figure 2 | Dried shark fins (copyright Mongabay, 2023)



Statement: "There is the FAO ishark fin to identify shark fins by species with AI"

The IShark Fin has still not been implemented as a tool for customs officers. Accuracy of species assignments of known specimens was variable and reached a maximum of 85.3% (genus) and 59.1% (species). While this value is higher (94 %) for the base line species, these only represent 39 species ([Barone et al., 2022](#)). **The IShark Fin algorithm therefore shows that even a well-developed algorithm has difficulties to identify loose fins to a species level** and that there is no reliable way to determine species identities without the shark carcass being naturally attached. This is especially the case as shark fins are commonly traded in bulk where, due to resource limitations in customs, not every fin is likely to be tested. In 2018 only 708 inspections have been performed at port for 41,603 Spanish landings ([STECF, 2019](#)). **Two cases of non-compliance with the EU's fins Naturally Attached regulation were reported for Spanish vessels in 2018 and 14 cases were reported between 2014 and 2018 for all member states together.** The 2% of all shark landings by Spanish vessels that were inspected at port in 2018 all were done at EU ports, with not a single inspection done in a port outside of the EU despite sharks being landed by EU vessels also in ports outside EU.

Statement: "According to the FAO, Trade is not a factor of the fishing pressure on sharks."

The FAO has stated that **"the EU is a significant player in the global shark fin trade as a core supplier to Asian markets** [and] has a responsibility to ensure that its participation in the global trade of shark-related products is not driving these species towards extinction. [...] The EU can and should do more to bring the entire trade in shark products under sustainable management. [...] **Global shark fin exports are declining, while the EU proportion of the trade continues to rise** - it is undoubtedly the species without management that continue to be caught and traded, despite widespread declines noted across many species in trade." ([FAO – IFAW, 2022](#))

Statement: "More restrictive regulations in the market have caused the reduction of trade in shark fins."

This statement is accurate on a global level, which is the reason for the demands made by the European Citizen Initiative. Some of the restrictions which caused this reduction are related to trade bans in the relevant countries ([Ferretti et al., 2019](#)) and a reduction in the demand (e.g., [Clarke et al., 2006](#) and [Jaiteh et al., 2017](#)). However, as highlighted above, **the EU proportion of the trade is increasing** ([FAO – IFAW, 2022](#)), highlighting that the EU is contributing less to this reduction than the global average.



Statement: "The income of shark meat for fishers from shark catches represents 60 % of the total, so shark fishing would not be profitable without the sale of the carcasses" and "Shark fishery is an important economic activity for Spanish, Portuguese and French fishing fleets"

As demonstrated in the Europeche presentation only [4 producers are responsible for 90% of the EU catches made by 124 vessels catching 95% of the sharks of the EU fleets](#) in the Atlantic, Indian Ocean and Pacific and a total of 14 associated businesses responsible for about 80% of the EU supply chain ([FIP Blues objectives](#), [FIP Blues on Mako sharks](#)) As a matter of fact these four fishery producer organizations including [OR.PA.GU](#), the main surface longlining fleet having at this time 42 vessels that target sharks in all oceans. The fishery had unsuccessfully tried to achieve MSC certification back in 2015/2016 and has also been the main driver behind the vocal oppositions over the last five years against a retention ban for shortfin mako in the Atlantic, even challenging [ICCAT's SCRS](#) advice on the outcome of the stock assessments published in 2019.

Simply blaming others, in this case the Chinese, of being even worse instead of addressing the real problems such as the unprecedented loss of biodiversity by overfishing and the illegal trade of threatened species for the value of their fins will certainly not resolve the problems. Stopping the trade of loose fins in EU aims to close down illegal over-exploitation and existing loopholes in a business driven by the massive overexploitation of sharks at a global level and should thus present a clear mandate for the EU to now walk the talk of its [EU Biodiversity Strategy for 2030](#), [Green Deal](#) and the other pledges of being a global leader in marine conservation.

Statement: "The shark fins are sent to California in the United States"

In 2012, the state of California has clearly stated that "it shall be unlawful for any person to possess, sell, offer for sale, trade, or distribute a shark fin" (AB 376) Effective January 1, 2012

[California Fish and Game Code § 2021 \(2022\) :: 2022 California Code :: US Codes and Statutes :: US Law :: Justia](#)

Based on the clear statement of the designated European industry representative before the European Parliament, the European fishing industry may have been violating the state law of California for almost a decade. Furthermore, since 22 December 2022, it has been the law of the entire United States that "no person shall possess, acquire, receive, transport, offer for sale, sell, or purchase a shark fin or a product containing a shark fin" according to Section 5946 of the recently passed National Defense Authorization Act.



Statement: "With this initiative we would be banning a perfectly legal and sustainable economic activity" and "Banning is not a solution"

In this position paper, we demonstrate the problematic nature of the legality of the loose shark fin trade. We highlighted the difficulties in determining fins to the species level to ensure that protected species are not traded and the impacts this trade has on marine ecosystems. As shark populations are dwindling around the globe, it has become clear that shark catches are not sustainable. For example, more than two thirds of all oceanic species are now threatened with extinction.

The lack of credibility in Europeche's statements, as they do not follow the best scientific evidence, indicates their need to mask the loose shark fin trade behind a story of a 'sustainable' and 'healthy' fishery.

However, a regulation addressing the trade of loose shark fins is the only solution which will ensure that:

- The Fins Naturally Attached Policy is effectively supported at the trade end of the commodity.
- Loopholes are closed that allow the trade of fins from protected species, in the process making it easier for customs to distinguish legally traded sharks from protected species.
- That CITES species are truly protected.
- That the market of fins coming from countries without FNA or finning regulations are not supported.
- The EU governments respect the demands of over 1.1 million EU citizens and over 100 NGOs.

The initiative believes that a trade regulation on loose fins is the only effective solution to meet one of the most difficult challenges that is hindering global shark conservation goals - the market for shark fins.



Annex 1

Table of examples of EU flagged vessels which have been apprehended for IUU fishing activities.

Flag state	Vessel name	IMO number	Year	Committed crimes
Spain	ANTONY	7236634	2016	illegal fishing; false documentation
	NORTHERN WARRIOR	8808903	2016	illegal fishing; false documentation
	VEMA	5251408	2018	illegal shark fishing and finning
	LABIKO 2	7325746	2017	illegal shark fishing; prohibited gear
	F/V HAI LUNG	6607666	2018	illegal Patagonian toothfish poaching
	F/V VIKING	8713392	2016	illegal Patagonian toothfish poaching
	F/V THUNDER	6905408	2016	illegal fishing in the Southern Oceans
	ALBACORA UNO	9127435	2013	illegal fishing and shark finning; prohibited gear; prohibited discarding of fish
	TXORI ARGI	9286724	2012	illegal fishing
	TXORI BERRI	9006033	2012	Suspected fishing with falsified licences
	TXORI UDIN	expected to be 7410670	2012	Suspected fishing with falsified licences
	F/V ALEMAR PRIMERO	9266748	2016	illegal targeting of (blue) sharks and prohibited species; shark finning; unauthorized gutting and processing of fish onboard
	CHALLENGE (PERSEVERANCE at the time of operation)	Unknown	2018	operating within the Convention Area without authorisation
Portugal	FRANCA MORTE	9297694	2010	illegal gear
	AVEIRENSE	7362823	2010	illegal gear: apparent infringement of NAFO measures because of an obstruction in the mesh in the cod end of the net
Germany	MAARTJE THEADORA	9182801	2012	illegal fishing; illegal gear
Netherlands	ANNELIES ILENA	8301187	2016	high-grading; illegal discarding of fish; illegal gear
Lithuania	KOVAS	7610426	2012	illegal fishing in prohibited zones; fishing without authorisation; damage of property; opposition against orders of authorities
Greece	ODIN	8907084	2014	Krill fishing in Antarctica; illegal transhipment of fish to another FV
Poland	SAGA	8607191	2012	illegal fishing in prohibited zones; switching off the VMS; damage of property