

Contact Information Make sure you submit your full contact details at the first phase you participate in within a specific assessment process. Subsequent participation will only require your name unless these details change.

Contact Name	First Kate	Last OConnell
Title	Marine Wildlife Consultant	
On behalf of (organisation, company, government agency, etc.)		
Organisation	Animal Welfare Institute (AWI)	
Department	N/A	
Position	Marine Wildlife Consultant	
Description	<p>The Animal Welfare Institute (AWI) is committed to safeguarding marine species and their habitats. Our efforts focus on curbing humankind's harmful impact by urging governments and other decision makers to halt or prevent damaging actions, as well as educating the public and seafood industry about the deleterious effects their actions can have on the oceans' inhabitants, including fisheries bycatch of non-target marine mammal species and sharks.</p> <p>AWI regularly participates in international fora including meetings of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and the International Whaling Commission (IWC). The organisation also regularly participates in the United Nations Open-ended Informal Consultative Process on Oceans and the Law of the Sea. AWI has also funded research related to the mitigation of cetacean entanglement in fishing gear.</p> <p>AWI recently began a review of Atlantic fisheries, in light of increased consumer interest in the products from these fisheries in the United States and Europe.</p>	
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Assessment Details

Fishery	North and South Atlantic swordfish Spanish longline fishery
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CAB	Bureau Veritas
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Assessment Stage	Fishery	Date	Name of Individual/Organisation Providing Comments
Public review of the draft assessment report	North and South Atlantic swordfish Spanish longline fishery	17 November 2016	Kate O’Connell, Marine Wildlife Consultant, Animal Welfare Institute (AWI)
Performance Indicator	Nature of Comment		
PI 2.1.1.	1	We wish to draw the CAB’s attention to a paper by Rodrigo Barreto et.al. 2015. Trends in the exploitation of South Atlantic shark populations. Conservation Biology, available at http://web.stanford.edu/~ferretti/assets/Barreto_et_al-2016-Conservation_Biology.pdf	
PI.2.1.1.	2	<p>The PCDR states with regard to both the North and South Atlantic stocks of blue sharks that “[o]verall, assessment results were uncertain (e.g. the absolute abundance varied by an order of magnitude between models with different structures) and should be interpreted with caution.” The report further acknowledged the uncertainty regarding data inputs related to the North Atlantic stock of blue sharks and that “the possibility of the stock being overfished and overfishing occurring could not be ruled out.” For the South Atlantic stock, the PCDR stated that, “[e]stimates 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.”</p> <p>With regard to South Atlantic mako sharks, the PCDR admitted to a high degree of uncertainty in past catch estimates, as well as a lack of “important biological parameters”, noting that these are obstacles for obtaining reliable estimates of current status of the stocks.</p>	

		<p>AWI notes data presented in the recent paper by Queiroz et al. (2016) –referenced in the PCDR –which determined that the tracks of Portuguese and Spanish longline vessels overlap with 80.7 percent of blue shark range and 79.6 percent of mako shark preferred habitat. The paper further stated that “the persistent use of localized areas that overlap fishing effort indicates potential for overexploitation at the ocean-basin scale.”</p> <p>Further, the PCDR indicates that observer coverage for this fishery is low, for the North Atlantic it is about 1 percent of the fishing days, and 3 percent for the South Atlantic</p> <p>Based on the above information, AWI contends that the scoring for this section cannot be justified, and that blue and mako sharks are likely endangered by overfishing.</p>
PI 2.1.3	2	<p>We do not believe that there is adequate information on which to assess the impact of this fishery with regard to shark species. In addition to the concerns raised regarding the low rates of observer coverage under PI 2.1.1 we note that there has been a recognition that there is systematic underreporting of data related to shark fisheries, see e.g. Passantino, A. 2013. The EU shark finning ban at the beginning of the new millennium: the legal framework. ICES Journal of Marine Science, doi.10.1093 and Worm B, Davis B, Kettner L, Ward-Paige CA, Chapman D, Heithaus MR, Kessel ST, Gruber SH. 2013. Global catches, exploitation rates and rebuilding options for sharks. Marine Policy 40: 194–204.</p>

<p>PI 2.3.1</p>	<p>1, 2</p>	<p>AWI is concerned that the CAB has not included all possible information as to interactions with ETP cetacean species that might be impacted by this fishery, and that therefore the impact of this fishery on these species has not been adequately addressed.</p> <p>The PCDR comments that “[l]ongline fisheries have been traditionally defined as having a low impact on marine mammals”. However, Garrison (2007) noted that many cetaceans do suffer mortality and serious injury as a result of longline interactions (Garrison, L.P. 2007. Interactions between marine mammals and pelagic longline gear in the U.S. Atlantic Ocean between 1992 and 2004. Fishery Bulletin, 105: 408–417).</p> <p>For example, between 1963 and 1998, a study of the Southern right whale (<i>Euabalaena australis</i> IUCN LC, CITES App. I) noted three mortalities in longline gear off South Africa (Best, P. B., Peddemors, V. M., Cockcroft, V. G., and Rice, N. (2001) Mortalities of right whales and related anthropogenic factors in South African waters, 1963-1998. Journal of Cetacean Research and Management, Special Issue 2: 171-176.) Of all whale entanglements reported off South Africa from 1975 to 2010, eight percent involved longlines (MA Meyer , PB Best , MD Anderson-Reade , G Cliff , SFJ Dudley & SP Kirkman (2011): Trends and interventions in large whale entanglement along the South African coast, African Journal of Marine Science, 33:3, 429-439).</p> <p>There are two known incidents of entanglement in the Central Atlantic swordfish/tuna longline fishery of an Atlantic spotted dolphin (<i>Stenella frontalis</i> IUCN DD, CITES App.II) see Lens, S. (2002) Spain progress report on cetacean research, May 2001 to March 2002, with statistical data for the calendar year 2001. Report of the International Whaling Commission, 54. 4 pp. and Josephson, B. (2008). SC/60/ProgRep USA USA Progress report on cetacean research, May 2007 to April 2008, with statistical data for the calendar year 2005. Both papers are available from the IWC Secretariat www.iwc.int.</p> <p>Overall, there is a dearth of information as to the effects</p>
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PI 2.3.3	2, 3	<p>We refer again to our concerns about the low level of observer coverage in this fishery, and reiterate our belief that there is insufficient information available to assess the full impact of this fishery on all ETP species.</p> <p>AWI contends that the condition placed (5) is totally inadequate to ensure protection of ETP species, as there has been no indication as to the percentage of observer coverage that will be agreed to by the client. Many studies have noted that at 5 percent coverage observer information is likely to capture the existence of bycatch in a fishery but cannot be expected to support robust estimates of bycatch rates; to get robust estimates at least 20 percent or more coverage may be needed, and where rare species are involved that will jump to between 50 to 100 percent (see eg, Gilman, E. et al. 2012. Performance Assessment of Bycatch and Discards Governance by Regional Fisheries Management Organizations, IUCN, Gland and Debski, I. et al. 2016. Observer coverage to monitor seabird captures in pelagic longline fisheries, WCPFC-SC12-2016/EB-IP-07.)</p>

General comment on this fishery	4	AWI does not support industrial fishing for sharks, either directly or as a primary or secondary species. With regard to takes of ETP species, we believe that a precautionary approach must be taken, especially in the absence of robust data and management measures such as observation and inspection programs designed to yield statistically significant coverage.