To Macarena G. SILVA; Lead Auditor; macarena.garcia@es.bureauveritas.com

Nieuwrode, February 9, 2015

Dear mrs Silva,

As founders of BlueShark Conservation, we would like to express a deep concern about the consideration to certify the North and South Atlantic swordfish & blue shark Spanish Longline Fisheries ORPAGU & CEPESCA under the MSC Sustainable Fisheries Certification.

Longlines are known to be indiscriminate and to generate substantial bycatch of non-commercial species including marine mammals, sharks, seabirds, sea turtles and other ecologically related species. For example, at least 61 species of seabirds have been identified in longline bycatch, including 22 species which are classified as endangered by the International Union for Conservation of Nature (IUCN) [(1)]. Therefore the sustainability of fisheries using longlines in itself, is highly questionable.

Due to catch on lines intended for tuna or swordfish as well as targeted shark fishing - with longlines among other methods - pelagic shark populations have declined dramatically over the last few decades. Of 21 oceanic pelagic shark and ray species, three-quarters is classified as threatened or near threatened [(2)]. For example in the Northwest Atlantic, between 1978-2003, scalloped hammerheads, white sharks and thresher sharks are each estimated to have declined by over 75% [(3)].

It is also estimated that between 1986 and 2000, 60% of the historical blue shark biomass has been removed from the Northwest Atlantic Ocean [(4)]. In the Northern Pacific, a 50% decrease in blue shark catches was observed on longline vessels in a period of just 13 years (from 1996 to 2009), supporting a high vulnerability of blue sharks to longline catches [(5)].

The depletion of sharks results in an imbalance in the marine ecosystem through throphic cascades [(6,7)] and the loss of commercially important fish and shellfish species down the food chain [(6,8)].

Blue sharks are currently classified as near threatened on the IUCN Red List [(9).] Nonetheless no limiting fish quota's have been established for this species of shark [(10)], nor for other highly vulnerable shark species such as mako sharks or even silky sharks, which have been determined to be the most vulerable to longline fishing in the Atlantic [(11)].

Advanced telemetry tracking in the North-East Atlantic has determined that blue sharks spend much of their time in areas where pelagic longlining activities are often highest, and in depth zones where these fisheries particularly target other species, which could account for the rapid declines recently reported for blue sharks in many parts of the world's oceans [(12)].

Rather than emerging in protected coves, baby blue sharks often spend their first years in open ocean where they are extremely vulnerable to longline activity. In the North Atlantic Ocean for example, a blue shark nursery has been identified in an area near the Azore Islands that is heavily frequented by fishing boats using longlines [(13)]. This poses a serious threat to the future generations of blue shark populations.

The MSC states that it only certifies sustainable fisheries and fishing practices. With the indiscriminate nature of longlines, the near threatened status of the blue shark and the perilous situation of pelagic sharks in general, no limiting quota's existing for the harvest of blue sharks, no protection for blue shark nurseries and the Spanish shark fisheries competing with many similar shark fisheries from around the world for the largest catches, their activity can in no way be deemed sustainable!

BlueShark therefore urges the MSC to reconsider and to refuse awarding these fisheries an MSC eco-label. We would also appreciate receiving regular updates on the MSC evaluation of these fisheries.

On behalf of
BlueShark Conservation
Founders Katrien Vandevelde & Jan Wouters
Belgium

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