

11-Aug-2013

To,

Jayanthi Natarajan,
Minister of Environment and Forests,
Paryavaran Bhavan, CGO Complex,
Lodi Road, New Delhi – 110003.

Sub: Request to formulate the **Fins Attached Policy** to regulate shark finning in India.

Honourable Minister,

We are writing to draw your attention to the over-exploitative practices of shark fishing in India and to call for a policy change to prevent this serious threat to these highly vulnerable animals. Sharks are apex predators in marine ecosystems, vital to the food chain. In this regard they may be considered equivalent to top terrestrial carnivores such as the tiger. Destruction of shark populations can thus lead to major imbalance in the ecosystem.

Over 66 species of sharks are reportedly found in the Indian seas. Many of these species are caught as both 'by-catch' and through specialised fishing gears. They are primarily harvested for their commercially valuable fins. These fins have tremendous demand in the markets across East Asia, South East Asia, Europe, and the United States. This demand has caused unregulated increases in the numbers of sharks being fished and subsequent pressure on shark populations in the Indian seas. Data from the Food and Agriculture Organisation (FAO) shows that India is the second largest nation involved in shark fishing catering to increasing demands from the South –East Asian, Chinese and American markets. As these are typically long lived species with a slow reproduction rate, over- exploitation can decimate entire populations of shark species very quickly.

In response to this, your ministry had brought nine species of sharks under the ambit of the Wildlife Protection Act (1972) and banned these from commercial fishing. However, the process of acquiring shark fins makes implementation of this law impossible. Shark fins are procured by a process called finning; removing the fins of sharks and throwing the dismembered animals back into the sea, alive. Since it is difficult to identify the species of shark from fins or mutilated carcasses, enforcement agencies have no way of ensuring that fishermen are not targeting protected species.

In this regard, we support a '**fins attached policy**' (**for all shark species**) and urge you implement this. Such a policy, which has already been adopted by nations including European Union member countries, the United States, and many Latin American countries, stipulates that fishermen cannot land a shark without its fins naturally attached to the body. Not only would such a measure reduce opportunities for undetectable finning, it would also make it easier for the Forest Department and other government authorities responsible for monitoring wildlife trade to enforce compliance with the Wildlife Protection Act, 1972 and relevant international conventions that India is party to. Landing entire sharks would also facilitate data collection on shark catch by species due to easier

carcass identification. Comprehensive data collection is crucial for India to have an effective and sound shark conservation and management policy.

In India, shark fishermen traditionally harvest the whole body of the shark as meat, and for trade in pharmaceutical and leather industries. However, of late there have been reports of targeted shark fishing for fins by some Indian as well as foreign vessels that are illegally fishing in the Indian Exclusive Economic Zone. A fins attached policy will ensure minimal wastage of this precious food resource and also act a strong deterrent to poaching practices, in particular by foreign vessels, thereby cutting down competition for the already dwindling shark stocks.

We further urge you strengthen monitoring mechanisms, to keep in check illegal trade of endangered shark species and establish a mechanism for frequent checks of foreign fishing vessels in Indian waters. Finally, we recommend that a comprehensive survey of shark species and their status be undertaken in Indian waters, which will provide better inputs for creating a more sustainable shark fishing industry in the country. Loss of large numbers of sharks, brought on by unregulated finning activity, potentially threatens the abundance, variety and survival of other marine species. Such unsustainable practices may have dramatic and undesirable ecological impacts that could potentially threaten yields of other commercial species. A fins-attached policy will hence provide security not only for future generations of sharks but also for all other animals dependent upon them for survival, including us humans.

Finally as a signatory nation to international conventions such as The Convention on International Trade in Endangered Species on Fauna and Flora (CITES) and a member of the FAO which recommends a National Plan of Action for conservation and management of Sharks (NPOA Sharks), India has yet to undertake concrete measures to monitor the practices used to procure shark fins. More than a dozen nations across the world have put into place strict regulations for safeguarding shark species against the cruelty and environmentally deleterious effects of being finned.

We hope you will give these facts due consideration and treat this letter as an urgent appeal to end destructive shark fishing practices in India.

Thanking you,

Yours' sincerely,



Tarun Nair
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<http://www.rwcindia.org/>