

03-September-2013

To,
Dr. Asad Rahmani,
Member - Standing Committee of National Board for Wildlife.

Dear Dr. Rahmani,

Sub: Agenda Item No. 3 (3.1 c) on the **Shark Fins Attached Policy** at the 30th meeting of the Standing Committee of National Board for Wildlife to be held on 4th September 2013.

Our comments to the **Shark Fins Attached Policy** are listed below -

Overall Impact: Slight to moderate. Most Indian fishermen rarely fin sharks since there is a market for shark meat in India. Foreign vessels in Indian waters don't need to land their catches in India, so there is no way to regulate their catches unless there are random boat checks by fisheries department or customs, when those vessels are still plying in Indian waters.

SUGGESTIONS FOR CURRENT SHARK FIN POLICY

1. **Involving fisheries departments:** The Ministry of Agriculture needs to be invited for all further discussions on shark fin policy so that fisheries departments will become more pro-active in monitoring and enforcement.
2. **Increased monitoring:** Creating awareness among the coast guard and customs department about the new shark fin policy and the need for random, at-sea vessel inspections.
3. **Focus on shark fin dealers and traders:** Since the policy states, "if anyone is found in possessions of fins without the corresponding body... he /she shall be presumed guilty of violating this act", dealers in shark fins will automatically be found in violation of the policy. A discussion about a planned crackdown on shark fin traders might be productive.

SUGGESTIONS FOR FUTURE SHARK MANAGEMENT

1. **Increased monitoring:** Putting endangered/ Schedule I sharks on the radar for coast guard and customs. This includes increasing awareness about identifying shark species.
2. **Moving beyond banning fishing of specific shark species:** Since fishing gear is not selective in the species it traps, fishermen cannot prevent the capture of 'Schedule I' species. Hence rather than simply listing more species in the schedules of the Wildlife (Protection) Act, it is important to work with fisheries research organizations to design fishing gear that will keep sharks away or be more species specific. This is a very important avenue of research to encourage.
3. **Focus on shark biology:** Very little is known about most shark species inhabiting Indian waters, including in which seasons they visit Indian waters, where their nurseries are, what types of habitats they prefer, how far they range and so on. Such information is critical for better shark conservation and management.

We hope you will consider these comments.

Thanking you,
Yours' sincerely,



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