

25 November 2020

Minister Akissa Bahri  
Ministre de l'Agriculture, des Ressources Hydrauliques et de la Pêche Maritime  
30 Avenue Alain Savary  
1002 TUNIS

Dear Mme Akissa Bahri,

On behalf of the Non-Governmental Organisations listed below we write to express our serious concern over the exploitation of threatened, protected sharks and rays in Tunisia, particularly the recent landing and sale of two Critically Endangered White Sharks (*Carcharodon carcharias*). These incidents clearly violate the 2012 General Fisheries Commission for the Mediterranean (GFCM) measure aimed at protecting the shark and ray (elasmobranch) species listed on Annex II of the Barcelona Convention *Protocol concerning the Specially Protected Areas and Biological Diversity in the Mediterranean*.

As you may know, under this measure (GFCM/36/2012/3)<sup>1</sup>, Annex II-listed elasmobranch species (including *C. carcharias*) “cannot be retained on board, transhipped, landed, transferred, stored, sold or displayed or offered for sale.” Instead, these species “must be released unharmed and alive to the extent possible,” and ensured “a high protection from fishing activities” by GFCM Contracting Parties and Cooperating non-contracting Parties.

The White Shark is classified by the IUCN as Critically Endangered in the Mediterranean and is widely recognized as exceptionally vulnerable to overexploitation. Indeed, it was among one of the first elasmobranchs listed under the Convention on International Trade in Endangered Species (CITES) and the Convention on Migratory Species (CMS). These treaties bring additional obligations for Tunisia to safeguard White Sharks.

We were therefore alarmed by reports of the capture and marketing of two White Sharks this month. Similarly worrisome incidents were reported in 2018, 2015, 2013, and 2012. In 2009, a White Shark found in a tuna trap was shot. As governments around the world have recognized, the first step to reversing the decline of White Sharks and other endangered elasmobranchs is to strictly ban such retention and require that all incidentally caught individuals be immediately and carefully released.

We are also concerned that GFCM-protected elasmobranchs including Giant Devil Rays (*Mobula mobula*), angel sharks (*Squatina spp.*), Blackchin Guitarfishes (*Glaucostegus cemiculus*), Common Guitarfishes (*Rhinobatos rhinobatos*) and Spiny Butterfly Ray (*Gymnura altavela*) have also been reported for sale in Tunisia over the last 12 months.

These landings reveal serious shortcomings in Tunisia’s fulfilment of its international commitments to protect imperilled elasmobranch species at the national level, and call into question Tunisia’s claims of GFCM/36/2012/3 implementation in reports to the GFCM.

We respectfully request information on Tunisia’s plans to protect threatened elasmobranchs, address any infractions associated with recent landings, and prevent the reoccurrence of such events.

Thank you for your attention to these pressing matters. We look forward to your reply.

Sincerely,

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<sup>1</sup> now updated as GFCM/42/2018/2

Shark Trust  
Shark Advocates International  
iSea

Albanian Center for Environmental Protection and Sustainable Development

All For Blue

Associació Lamna

Association Ailerons

Association Pour l'Etude et la Conservation des Sélaciens (APECS)

Associazione Isoetes, no-profit association

Blue World Institute of Marine Research and Conservation

CATSHARKS, Association for the study and conservation of elasmobranchs and its ecosystems

Des requins et des Hommes

Enalia Physis Environmental Research Centre

Ente Fauna Marina Mediterranea

Ichthyological Research Society of Turkey

Ilija Cetkovic, University of Montenegro - Institute of Marine Biology

Longitude 181

Marine and Environmental Research Lab Ltd. (MER Lab),

Marine biology in Libya

Mendil Hamza Med Anis, PhD Laboratoire Conservation et Valorisation des Ressources Marines,

Ecole Nationale Supérieure des Sciences de la Mer et de l'Aménagement du Littoral

Mersea Marine Conservation Consulting

Morigenos

OceanCare

Sami Mhenni, marine activist

Sea Shepherd Greece

SHARKPROJECT

Sharks Educational Institute

Sharks in Israel

SUBMON

Tethys Research Institute

The Dolphin's Voice e.V

The MECO (Mediterranean Elasmobranchs Citizen Observations) project,

Turkish Marine Research Foundation (TUDAV),

University of Calabria, Laboratory of Marine Zoology and Herpetology, Department of Biology,  
Ecology and Earth Sciences

University of Patras, Department of Animal Production, Fisheries & Aquaculture