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1. مَدْرُوسٌ مَدْرَسَةٌ مَدْرَسَتُهُ مَدْرَسَتُهُمَا مَدْرَسَتُهُمَا

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۱. *مَنْ يَتَّقِ اللَّهَ يَجْعَلْ لَهُ مَخْرَجًا*
 ۲. *وَيَرْزُقْهُ مِنْ حَيْثُ لَا يَحْتَسِبُ وَمَنْ يَتَّقِ اللَّهَ يَجْعَلْ لَهُ مَخْرَجًا*
 ۳. *وَيَرْزُقْهُ مِنْ حَيْثُ لَا يَحْتَسِبُ وَمَنْ يَتَّقِ اللَّهَ يَجْعَلْ لَهُ مَخْرَجًا*
 ۴. *وَيَرْزُقْهُ مِنْ حَيْثُ لَا يَحْتَسِبُ وَمَنْ يَتَّقِ اللَّهَ يَجْعَلْ لَهُ مَخْرَجًا*
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7. **مِنْ مَجْدِ رَبِّكَ** **سُبْحَانَكَ** **وَمِنْ مَجْدِ رَبِّكَ** **سُبْحَانَكَ**

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8. $\frac{1}{x^2} = x^{-2}$ $\frac{d}{dx} x^{-2} = -2x^{-3} = -\frac{2}{x^3}$

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9. $\frac{1}{2} \times \frac{3}{4} = \frac{1 \times 3}{2 \times 4} = \frac{3}{8}$

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سکھ : 18 آگست 2024 کی دس بجے آؤ ریسمینٹ آؤٹ آف سروس، ریٹائرمنٹ اور دیگر امور پر تبادلہ خیال کریں۔

English Translation of Comments on the draft regulation on longlining

Thank you for inviting public comments on the draft regulation on longline fisheries. We would like to urge the Ministry to reconsider the decision to re-open the longline fishery in the Maldives due to the below concerns:

1. **Environmental concerns:** Longlines have been identified as having one of the highest bycatch rates for many ecologically important species, which is a global threat to long-lived animals such as sharks, sea birds, sea turtles, and marine mammals. The mortality rate among non-target species is alarmingly high and exceedingly difficult to mitigate, which puts pressure on the survival of these already vulnerable populations. This is particularly the case for sharks and rays. Studies show that longlining not only has unsustainable bycatch rates of sharks (up to 50%), but also high mortality rates, putting additional pressure on the survival of critically endangered species - even if they are released from longlines after capture¹.

Up to a quarter of the total catch in some pelagic longline tuna fisheries are shark species. Sharks are relatively long-lived, mature relatively late and have few offspring. This makes them especially vulnerable to overfishing. Globally, almost 60-70% of shark and ray species are threatened with extinction. It is indisputable that sharks and other vulnerable species will be caught in significant numbers as bycatch in longline fishery. Allowing the landing of sharks to be processed as yet another product effectively facilitates and consolidates a market for shark fishery, undermining the Maldives' position as an international protector and stewards of our shark sanctuary. Allowing the landing of sharks which are caught as bycatch in the longline fishery, creates an economic incentive to target them, which can lead to overfishing. A study by Pacoureau et al. showed that since 1970, the global abundance of oceanic sharks and rays has declined by 71% owing to an 18-fold increase in relative fishing pressure². A study by Sherman et al. showed that nearly two-thirds (59%) of the 134 coral-reef associated shark and ray species are threatened with extinction³. The Maldives' experience of trying to manage the shark longline fishery between the 1990s and 2000s was hugely unsuccessful in preventing shark population declines which led to a 'boom and bust' fishery.

Longlines are often lost in the ocean and never retrieved. This can continue to catch marine life indiscriminately, a phenomenon known as ghost fishing. This can contribute

¹ <https://www.science.org/doi/full/10.1126/sciadv.adg3527>

² <https://www.nature.com/articles/s41586-020-03173-9>

³ <https://www.nature.com/articles/s41467-022-35091-x>

to further declines in marine species and habitat degradation plastic pollution and associated contamination of the already compromised ocean food web.

2. **Sustainability concerns:** The Maldives is world renowned as a leader in sustainable fishing practices. Our one-by-one tuna fisheries are beneficial both to Maldivian fishers and the marine ecosystem. Longlining in the Maldives will add increased pressure on the already-overfished tuna and billfish populations in the Indian Ocean. The *Thunnus obesus* (Yellowfin tuna), *Thunnus albacares* (Bigeye tuna), *Makaira nigricans* (Blue marlin) and *Kajikia audax* (Striped marlin) stocks in the Indian Ocean are considered overfished or subject to overfishing.

Sharks, tuna, and billfish are considered to be top predators, playing a critical role in the structure and function of all marine ecosystems. The removal of significant numbers of large predators through longline fishing can alter marine food webs, affecting the balance and health of entire ecosystems. These changes can have unforeseen impacts on the sustainability of other marine life and biodiversity.

3. **Food security:** The depletion of tuna stocks can compromise food security which is crucial for the dietary needs of Maldivians. As tuna species become overfished, Maldives will become more dependent on imports to meet our seafood demands, making us more vulnerable to global market fluctuations and trade restrictions. This dependence can negatively impact national food security at a time when climate change and related other shocks (such as pandemics) undermine access to adequate food in our communities.
4. **Conservation achievements:** Maldives is one of only 17 shark sanctuaries in the world; the second in the world and the only shark sanctuary in the Western Indian Ocean. This sanctuary provides a safe haven for these threatened and ecologically critical species. The sustained recovery of sharks in the Maldives following the implementation of the shark fishing and export ban in 2010-2011 is applauded globally. The Maldives Shark Sanctuary is one of the most important shark sanctuaries in the world, due to global fishing pressure in the Indian Ocean Waters. It plays a key role to ensure the future survival of many critically endangered sharks, such as the Great Hammerhead Shark (*Sphyrna mokarran*) and the Scalloped Hammerhead Shark (*Sphyrna lewini*). Both of these species also have high post-release mortality rates (up to 90% do not survive).⁴ The current proposal would undermine the conservation achievements of the Maldives in the past 15 years and would, ***de facto* recommence shark fishing in Maldives.**

⁴ <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0255673>

The current proposal allows for the landing of all shark species except for those listed in CITES Appendix I and *Carcharhinus longimanus* (Oceanic whitetip Shark) and *Alopias* (Thresher Shark). The only shark species on the National Protected Species List of the Maldives is *Rhincodon typus* (Whaleshark). No shark species occurring in the Maldives are listed in CITES Appendix I, so this means the current proposal would only prohibit the landing of three shark species. If retention of sharks is to be allowed, then at the bare minimum all CITES Appendix II species should join IOTC and CITES Appendix I species as being prohibited in terms of retention or trade until the relevant CITES paperwork (Non Detriment Findings, Legal Acquisition Findings and Introduction from the Sea permits) are produced and verified by all relevant Government departments – a standard practice in responsible fishing nations that continue to catch CITES listed sharks around the world. After CITES CoP19 in 2022 over 90% of sharks traded for their fins are now listed on CITES Appendix II. To ensure compliance with CITES and CMS along with IOTC, the retention of sharks in any reopened longline fishery should be prohibited, to protect these biologically vulnerable animals and ensure the Maldives is in compliance with all of its international obligations not just those that pertain to the IOTC.

Maldives played a leading role in the inclusion of *Carcharhinus falciformis* (Silky shark) in CITES Appendix II at the COP17 held in Johannesburg, South Africa in 2016, due to the importance of this species to the tuna fishery of the country. Allowing the landing and export of this species goes against the principles the Maldives has worked so hard to advocate for intentionally over many years.

5. **Fisher impact:** Longlining can undermine the livelihoods of local fishers whose income is derived from sustainable fishing practices. This fishing technique poses significant risks to the traditional pole-and-line and the more recently established handline fishers through market competition, including the ability to undercut fishers' supply. Meanwhile, one-by-one fishing provides vital employment for many Maldivians and preserves marine biodiversity since it is a highly selective fishing technique, only catching targeted species. In contrast, the longline fishery would only benefit a few individuals with the financial capacity to purchase quotas, that can be traded in a closed market with the effect of selling parts of the national EEZ for exploitation.

Several shark species such as the Silky shark are closely associated with pole-and-line fisheries, helping fishers to locate free-swimming tuna schools and helping to maintain the cohesiveness of tuna schools.

6. **Tourism impact:** Allowing longline fishing could lead to significant and long-term reputational losses for the Maldives since shark landings will be unavoidable and

constitute a significant quantity of the catch. A 2019 study showed that local businesses associated with tourists visiting the Maldives for diving with sharks earns a revenue of US\$ 51.4 million annually. The depletion of shark populations would impact biodiversity and potentially diminish the Maldives' attractiveness and reputation as a premier destination for marine tourism, which could significantly reduce tourism revenue. According to the study: travel-related expenses generated by these tourists contributed an additional US\$51.4 million to local businesses. Beyond these revenues, the industry yields annual business tax revenues of US\$7.2 million and provides US\$4.1 million annually in salaries to employees within the diving sector. Any decline in shark populations caused by longlining will inevitably damage the viability of shark diving tourism, with severe economic repercussions that will reverberate across the entire tourism sector, including, Dive operations, Liveaboard operators, Local guesthouses, Hotels and resorts, Local restaurants, and Shops and suppliers.

7. **Economic concerns:** The recognition of the Maldives' sustainability leadership brings economic benefits to the country not just from tourism but also, importantly, by ensuring the health of Maldivian ocean, coral reefs and island communities. Longline fishing profits are often short-lived due to overfishing and outweighed by the hidden costs of damage to local marine ecosystems. Conversely, sustainable practices, such as the one-by-one tuna fishing which is already practiced in the Maldives can lead to more stable, long-term economic benefits.

Historically, vessels that use longlines tend to employ mostly foreign crews, thus competing with Maldivian fishers who are not trained to use longline vessels. Furthermore, allowing longline fishing would potentially open the door to foreign longline vessels due to the lack of such vessels in Maldives.

8. **Monitoring and enforcement:** Longline fishing is proposed to occur over extensive and remote areas of the Maldivian ocean and beyond the EEZ (Chapter 2, clause 6). However, the map provided (Annex 2) does not clearly show this area. Monitoring and enforcing such a vast area would be very challenging, especially considering the already limited human and financial resources in the Maldives. The Draft Regulation also stipulates that only dead sharks will be retained and landed to port. This has been found not to work in longline fisheries globally - fishers will report that all shark catch is dead to allow retention. This clause should only be allowed to enter into force if there is a verifiable means of confirming the shark was dead at the point of landing. These reasons bring to question the ability to effectively oversee longlining activities and ensure compliance which requires adequately funded and staffed regulatory bodies for patrolling, inspection, and

prosecution of illegal activities. While technology such as vessel monitoring systems (VMS) and satellite tracking can aid enforcement, they require significant investment, technical expertise and infrastructure, which are currently not in place.

9. **Human rights concerns:** The longline fishery operates over considerably long distances and requires crews to be at sea over extensive periods of time. This can lead to many issues for fishers including poor conditions on board, impacts on communities of fishers being away for long periods, as well as increased health and safety risks. The lack of proper rest, nutrition and hygiene can affect even the hardest-working individuals and have long-term health implications. Also, being away from home for extended periods disrupts family and community ties. As such, the crew on long line fisher boats are usually comprised of foreigners as local fishers prefer to carry out alternative methods of fishery that enables them to stay close to family. Traditional Maldivian fishing methods typically allow fishers to return home more frequently, maintaining social stability and community cohesiveness.

Thank you for considering our comments. We remain committed to collaborating with the Ministry in fostering a sustainable tuna fishery in the Maldives; one that supports the wellbeing of our tuna fishers while safeguarding the health of our marine environment for current and future generations.

We strongly urge the government not to resume longline fishing in the Maldives.

*Comments submitted to the
Ministry of Fisheries and Ocean Resources, Maldives
on 18 August 2024*