

The President's Office
Boduthakurufaanu Magu
Malé 20113

29 October 2025

Re: Recommendation to Maintain the Maldives National Shark Sanctuary and Sustain the Country's Global Leadership in Shark Conservation

Your Excellency, The Honorable Dr Mohamed Muizzu,

The IUCN Species Survival Commission (SSC) Shark Specialist Group (SSG), the global authority on the conservation status of sharks, rays, and chimaeras, writes to you regarding recent discussions on reopening deepwater shark fisheries, specifically targeting gulper sharks (family Centrophoridae), within the Maldivian Exclusive Economic Zone (EEZ).

We commend the Government of the Maldives for its outstanding leadership in marine conservation and for establishing the national shark fishing ban in 2010 — a visionary action that has made the Maldives a global model for the protection of threatened marine species. We respectfully urge the Government to maintain this commitment by upholding the shark sanctuary and resisting any proposals to reopen gulper shark fisheries. Reversing this policy, even partially, would risk undermining both conservation and economic gains achieved over the past decade.

We offer key justifications for maintaining the total ban on shark and ray fishing in the Maldivian EEZ:

- **Severe Global and Local Vulnerability:** Gulper sharks are the world's most threatened deepwater shark groups, with 75% of their species assessed as threatened with extinction on the IUCN Red List of Threatened Species. They have an extremely slow life history, maturing at 20 years or older and reproduce infrequently (1-2 pups per litter), making them exceptionally slow to recover from depletion. The historical Maldivian gulper shark fishery, which peaked in the mid-1980s, collapsed in less than a decade due to overexploitation, with an estimated 97% population decline. There is no evidence that these populations have recovered. Studies from Australia suggest that rebuilding even to 25% of unfished biomass for these species could take more than 80 years. Reopening the fishery now would erase any potential for recovery.
- **Economic Non-Viability:** Deepwater shark fisheries are inherently short-lived "boom and bust" operations. Any new fishery would likely collapse even more rapidly than the previous one, leaving fishers and communities worse off. Meanwhile, major trade destinations like the European Union are turning toward sustainable and plant-based alternatives to liver oil (the main derivative product used). The negligible and short-term financial returns from reopening this fishery cannot justify the long-term ecological and reputational costs.
- **Rising International Regulation:** Given the precarious conservation status of gulper sharks, international restrictions are tightening. A proposal to list all gulper sharks under the Convention on International Trade in Endangered Species of Wild Flora and Fauna (CITES Appendix II) has been submitted by the Government of the United Kingdom of Great Britain and Northern Ireland for consideration at the 20th Conference of Parties. If adopted, the Maldives would be required to prove that any trade is legal, traceable, and sustainable through a positive



Non-Detriment Findings (NDF). Given the biology and past fishery collapse of these species, meeting such requirements would be scientifically implausible, exposing the country to potential CITES compliance measures — including suspension of trade for other marine and non-marine listed species.

- **Higher Economic Value of Live Sharks:** Sharks are worth far more alive than dead. Research shows that shark-related tourism generates over US\$14 million annually in direct revenue for the Maldives, with broader economic benefits exceeding US\$50 million. Conversely, lifting the sanctuary status could decrease dive demand by up to 56%, translating into an annual loss exceeding US\$24 million. Maintaining the sanctuary thus secures livelihoods and protects a cornerstone of Maldivian tourism and its global brand.
- **Practicality and Compliance:** A national, comprehensive shark fishing ban remains the most effective and enforceable management approach for an archipelagic nation like the Maldives. Attempting to regulate selective deepwater fishing or species-specific quotas would be costly and impractical, and could inadvertently open loopholes for incidental and/or illegal catches of other protected species such as Oceanic Whitetip Sharks, Whale Sharks, and manta rays. Maintaining the current ban ensures continued compliance with international commitments under the Indian Ocean Tuna Commission (IOTC) and the Convention on the Conservation of Migratory Species of Wild Animals (CMS).

We respectfully urge the Government of the Maldives to uphold its exemplary leadership by maintaining the national shark sanctuary. The science is unequivocal: we already have extensive evidence from the Maldives and other regions showing that deepwater shark fisheries cannot be managed sustainably and that recovery, once populations collapse, takes decades. Listening to this science and acting accordingly will safeguard vulnerable ecosystems, secure long-term economic benefits, and reaffirm the Maldives' position as a global champion for evidence-based marine conservation.

The IUCN SSC Shark Specialist Group stands ready to provide any further scientific, technical, or advisory support the Government may require.

With the highest respect and appreciation for your continued leadership,

Dr Rima Jabado

Chair | IUCN Species Survival Commission Shark Specialist Group