Irish Wildlife Trust

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Registered Charity (CRA) Number: 20010966

June 4th 2024

Re: Better protecting sharks through sustainable fishing and trade

1. Considering the existing EU shark conservation and management measures[1], is there a need for an additional EU action to better protect and manage sharks? Please choose the statement that you consider the most correct.

The 'Fins naturally attached' regulation is not sufficient. Finning can occur once the shark is landed and so it is still possible for the trade of fins from critically endagered shark species to occur due to loopholes and poor enforcement. DNA analysis is usually needed to determine what species of shark the fin is from. If the entire import, export and transit of fins was banned in the EU then this would help close these loopholes.

What environmental, social and economic consequences would you expect, within and outside of the EU, if the EU action consisted of maintaining and implementing in the most efficient possible manner the current EU ban on finning on board?

	Very negative	Moderately negative	Neutral	Moderately positive	Very positive	No opinion
ENVIRONMENTAL CONSEQUENCES: State of shark population	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Health of marine ecosystems	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Climate change resilience and mitigation	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	◉	○	○	○	○	○
SOCIAL CONSEQUENCES: Employment	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Need for reskilling	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Work safety	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Public health	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fishing fleet	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fish processing industry	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Retail	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Tourism	◉	○	○	○	○	○
ECONOMIC CONSEQUENCES: Other sectors, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Trade patterns and supply chains	○	○	◉	○	○	○

One of the reasons the 'Fins Naturally Attached' regulation is not sufficient is because it is near impossible to identify what species of shark the fin is from once it is removed from the body and has started the drying process. DNA analysis is needed and this is not something which can realistically be done at ports and throughout the EU. Therefore the illegal trade in endangered species will continue.
Other countries have tried and failed to enforce current finning regulations and so what is needed is new legislation which effectively bans the trade and transit of fins completely.
Sharks are vital components of the ocean ecosystem. Removing top predators has a knock

on effect across all trophic levels and the fin trade is one of the reasons so many sharks are killed each year. 167 shark species are threatened with extinction (1) and the number of sharks in the high seas has declined by more than 70% in the last 50 years (2).
A shark fin trade ban would be in line with the goals sought by the EU. The EU has recently demonstrated its ambitions in shark protection by supporting Panama's proposal to list all requiem sharks on CITES Appendix II during the CITES CoP19 in November 2022. If the EU wants to take action and add credibility to its support of the CITES application, strengthening its own legislation by banning a trade on loose fins would demonstrate this. Currently, Member States Spain, Portugal and France are among the Top 15 shark-fishing nations of the world (3) and are often even subsidised by the EU (4). A recent study found that the EU Member States supplied on average up to 45% (increasing from 28% in 2003) of the shark fin related imports into Hong Kong, Singapore and Taiwan in 2020 (5). This industry is not essential for the employment of EU citizens but without the ecosystem benefits that healthy shark populations provide, many industrys will feel a negative knockon effect from decimated shark numbers, including tourism.

1.Dulvy. et al., 2021
2.Pacoureau, Rigby, Kyne et al., 2021. and Dulvy et al., 2017
3. TRAFFIC, 2019
4.Council directive 2003/96/EC; European Commission Proposal für Council directive COM(2021) 563 final, 2021/0213 (CNS)
5. IFAW, 2022

2.2. Outside the EU:

	Very negative	Moderately negative	Neutral	Moderately positive	Very positive	No opinion
ENVIRONMENTAL CONSEQUENCES: State of shark population	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Health of marine ecosystems	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Climate change resilience and mitigation	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	◉	○	○	○	○	○
SOCIAL CONSEQUENCES: Employment	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Need for reskilling	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Work safety	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Public health	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fishing fleet	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fish processing industry	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Retail	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Tourism	◉	○	○	○	○	○
ECONOMIC CONSEQUENCES: Other sectors, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Trade patterns and supply chains	○	○	◉	○	○	○

Since the EU is a major global hub for the trade of shark fins, by not strengthening regulations to ensure greater protection of invaluable shark species, we are assisting in the decimation of shark populations worldwide.
This will not only have huge negative environmental impacts due to the loss of top predators worldwide and the valuable ecosystem services they provide (top predators on land and sea have been shown to help keep ecosystems within their natural equilibrium by controlling populations in other trophic levels which in turn also helps to protect vital habitats), it will also have massive economic impacts. Many countries rely on money brought into the country via

tourism. Shark diving generates hundreds of millions of dollars worldwide every year and for the countries that rely on this money, decreasing shark populations will have a devastating effect on their economy.
Shark fishermen in poorer countries do not receive the lucrative price tag for the fins they sell. They would have a greater and more sustainable livlihood fthrough tourism for generations by having healthy shark populations in their national waters. The intermediate link of traders are the ones which are collecting the most money and increasing the market for fins.

3. What environmental, social and economic consequences would you expect, within and outside of the EU, if the EU action consisted of reaching out to international partners to promote a worldwide finning ban, the improvement of management measures, and the reduction in global shark (fins) consumption?

	Very negative	Moderately negative	Neutral	Moderately positive	Very positive	No opinion
ENVIRONMENTAL CONSEQUENCES: State of shark population	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Health of marine ecosystems	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Climate change resilience and mitigation	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	◉	○	○	○	○	○
SOCIAL CONSEQUENCES: Employment	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Need for reskilling	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Work safety	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Public health	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fishing fleet	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fish processing industry	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Retail	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Tourism	◉	○	○	○	○	○
ECONOMIC CONSEQUENCES: Other sectors, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Trade patterns and supply chains	○	○	◉	○	○	○

3.1. Within the EU:

It has been shown over the years that finning bans do not work. They are extremely hard to enforce and it allows for the masking of fins from endangered species and species protected under CITES. Improving management measures is vital but this alone will not be enough. It is unlikely that the EU could create effective change in regards to the consumption of shark fins. Other advocacy groups across the world

are currently working on this issue. The greatest action which the EU could do to create the biggest positive impact for shark conservation would be improving and strengthening legislation to stop the trade of fins.

Outside the EU:

	Very negative	Moderately negative	Neutral	Moderately positive	Very positive	No opinion
ENVIRONMENTAL CONSEQUENCES: State of shark population	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Health of marine ecosystems	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Climate change resilience and mitigation	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	◉	○	○	○	○	○
SOCIAL CONSEQUENCES: Employment	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Need for reskilling	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Work safety	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Public health	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fishing fleet	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fish processing industry	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Retail	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Tourism	◉	○	○	○	○	○
ECONOMIC CONSEQUENCES: Other sectors, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Trade patterns and supply chains	○	○	◉	○	○	○

4. What environmental, social and economic consequences would you expect, within and outside of the EU, if the EU action consisted of putting in place a certification scheme for import and export of shark and shark products confirming that they have been obtained in a sustainable way (complementing the existing certifications under the Convention on International Trade in Endangered Species of Wild Fauna and Flora and under the EU rules on illegal, unreported and unregulated fishing)?

	Very negative	Moderately negative	Neutral	Moderately positive	Very positive	No opinion
ENVIRONMENTAL CONSEQUENCES: State of shark population	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Health of marine ecosystems	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Climate change resilience and mitigation	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	◉	○	○	○	○	○
SOCIAL CONSEQUENCES: Employment	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Need for reskilling	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Work safety	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Public health	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fishing fleet	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fish processing industry	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Retail	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Tourism	◉	○	○	○	○	○
ECONOMIC CONSEQUENCES: Other sectors, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Trade patterns and supply chains	○	○	◉	○	○	○

DNA analysis is needed to identify what species a fin has been taken from. This process is expensive and lengthy and would not be viable to roll out across ports and transit hubs in the EU. Without knowing what species the fin is from, it is impossible to tell whether a fin has been sustainably harvested.
While improving measures under CITES and the IUU regulation would be desirable, it is not the most effective and clearest way to ensure the protection of vulnerable shark species. There will always be loopholes and difficulties in enforcement. Having a clear cut regulation to ban the trade of all fins will remove many time consuming, expensive and unnecessary steps which would be needed if we are to rely on existing regulations (even with improvements).

Outside the EU:

	Very negative	Moderately negative	Neutral	Moderately positive	Very positive	No opinion
ENVIRONMENTAL CONSEQUENCES: State of shark population	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Health of marine ecosystems	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Climate change resilience and mitigation	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	◉	○	○	○	○	○
SOCIAL CONSEQUENCES: Employment	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Need for reskilling	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Work safety	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Public health	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fishing fleet	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fish processing industry	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Retail	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Tourism	◉	○	○	○	○	○
ECONOMIC CONSEQUENCES: Other sectors, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Trade patterns and supply chains	○	○	◉	○	○	○

5. What environmental, social and economic consequences would you expect, within and outside of the EU, if the EU action consisted of negotiating bilateral agreements with the main shark product consuming and trading partners to obtain their commitment to sustainable supply of shark products?

	Very negative	Moderately negative	Neutral	Moderately positive	Very positive	No opinion
ENVIRONMENTAL CONSEQUENCES: State of shark population	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Health of marine ecosystems	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Climate change resilience and mitigation	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	◉	○	○	○	○	○
SOCIAL CONSEQUENCES: Employment	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Need for reskilling	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Work safety	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Public health	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fishing fleet	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fish processing industry	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Retail	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Tourism	◉	○	○	○	○	○
ECONOMIC CONSEQUENCES: Other sectors, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Trade patterns and supply chains	○	○	◉	○	○	○

For a supply of shark products to be sustainable, the trade of loose fins would have to be discontinued. Without DNA analysis at every stage of the transit process, it is impossible to prevent endangered and protected species falling victim to the current loopholes in legislation.
The value must also be taken out of loose fins so that sustainability is the main focus. Having a ban on all loose fins would allow for the beginning of an analysis on what could potentially be deemed sustainable shark fishing.

Outside the EU:

	Very negative	Moderately negative	Neutral	Moderately positive	Very positive	No opinion
ENVIRONMENTAL CONSEQUENCES: State of shark population	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Health of marine ecosystems	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Climate change resilience and mitigation	◉	○	○	○	○	○
ENVIRONMENTAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	◉	○	○	○	○	○
SOCIAL CONSEQUENCES: Employment	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Need for reskilling	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Work safety	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Public health	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fishing fleet	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fish processing industry	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Retail	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Tourism	◉	○	○	○	○	○
ECONOMIC CONSEQUENCES: Other sectors, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Trade patterns and supply chains	○	○	◉	○	○	○

6. What environmental, social and economic consequences would you expect, within and outside of the EU, if the EU action consisted of an EU ban on exports and imports of loose shark fins?

	Very negative	Moderately negative	Neutral	Moderately positive	Very positive	No opinion
ENVIRONMENTAL CONSEQUENCES: State of shark population	○	○	○	○	◉	○
ENVIRONMENTAL CONSEQUENCES: Health of marine ecosystems	○	○	○	○	◉	○
ENVIRONMENTAL CONSEQUENCES: Climate change resilience and mitigation	○	○	○	○	◉	○
ENVIRONMENTAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	○	○	○	○	◉	○
SOCIAL CONSEQUENCES: Employment	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Need for reskilling	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Work safety	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Public health	○	○	○	○	◉	○
SOCIAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fishing fleet	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fish processing industry	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Retail	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Tourism	○	○	○	○	◉	○
ECONOMIC CONSEQUENCES: Other sectors, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Trade patterns and supply chains	○	○	◉	○	○	○

The environmental benefits will be extremely positive which has been shown through effective protection of other keystone species. Economic benefits will balance out as any short term losses will be reimbursed and more through the economic benefits of having healthy ecosystems within the oceans. Healthy oceans are one of the biggest tools we have for climate mitigation and as the climate crisis intensifies we must ensure effective protection of our seas and the important species within.

Outside the EU:

	Very negative	Moderately negative	Neutral	Moderately positive	Very positive	No opinion
ENVIRONMENTAL CONSEQUENCES: State of shark population	○	○	○	○	◉	○
ENVIRONMENTAL CONSEQUENCES: Health of marine ecosystems	○	○	○	○	◉	○
ENVIRONMENTAL CONSEQUENCES: Climate change resilience and mitigation	○	○	○	○	◉	○
ENVIRONMENTAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	○	○	○	○	◉	○
SOCIAL CONSEQUENCES: Employment	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Need for reskilling	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Work safety	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Public health	○	○	○	○	◉	○
SOCIAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fishing fleet	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fish processing industry	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Retail	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Tourism	○	○	○	○	◉	○
ECONOMIC CONSEQUENCES: Other sectors, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Trade patterns and supply chains	○	○	◉	○	○	○

7. What environmental, social and economic consequences would you expect, within and outside of the EU, if the EU action consisted of striving for adoption of an international ban on trade in loose shark fins?

	Very negative	Moderately negative	Neutral	Moderately positive	Very positive	No opinion
ENVIRONMENTAL CONSEQUENCES: State of shark population	○	○	○	○	◉	○
ENVIRONMENTAL CONSEQUENCES: Health of marine ecosystems	○	○	○	○	◉	○
ENVIRONMENTAL CONSEQUENCES: Climate change resilience and mitigation	○	○	○	○	◉	○
ENVIRONMENTAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	○	○	○	○	◉	○
SOCIAL CONSEQUENCES: Employment	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Need for reskilling	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Work safety	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Public health	○	○	○	○	◉	○
SOCIAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fishing fleet	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fish processing industry	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Retail	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Tourism	○	○	○	○	◉	○
ECONOMIC CONSEQUENCES: Other sectors, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Trade patterns and supply chains	○	○	◉	○	○	○

The EU taking the initiative and spearheading an international fin ban would be a solution with global effect while also helping to increase the EU's reputation as a leader in conservation on the global stage. It will show forward thinking, not only for important endangered species but also for vulnerable communities worldwide which rely on the economic benefits healthy oceans provide. With COP16 on Biodiversity coming up this year, being able to show progressive and effective steps at protecting

ocean biodiversity would help to increase confidence in the EU's ability to deliver on biodiversity targets.

Outside of EU

	Very negative	Moderately negative	Neutral	Moderately positive	Very positive	No opinion
ENVIRONMENTAL CONSEQUENCES: State of shark population	○	○	○	○	◉	○
ENVIRONMENTAL CONSEQUENCES: Health of marine ecosystems	○	○	○	○	◉	○
ENVIRONMENTAL CONSEQUENCES: Climate change resilience and mitigation	○	○	○	○	◉	○
ENVIRONMENTAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	○	○	○	○	◉	○
SOCIAL CONSEQUENCES: Employment	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Need for reskilling	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Work safety	○	○	◉	○	○	○
SOCIAL CONSEQUENCES: Public health	○	○	○	○	◉	○
SOCIAL CONSEQUENCES: Other aspects, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fishing fleet	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Fish processing industry	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Retail	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Tourism	○	○	○	○	◉	○
ECONOMIC CONSEQUENCES: Other sectors, to be specified in the free-text box below	○	○	◉	○	○	○
ECONOMIC CONSEQUENCES: Trade patterns and supply chains	○	○	◉	○	○	○

Having the EU show its ambition in helping to solve global problems will encourage other countries to follow their direction and implement a ban on the trade of shark fins.

8. What environmental, social and economic consequences would you expect, within and outside of the EU, if the EU takes another action that you would suggest (to be specified below)?

We do not believe any other action is viable. Sharks are running out of time. Ending the trade of fins in the EU and worldwide is the clearest and most effective action that can be taken.

Kind regards,

Grace Carr
Marine Advocacy Officer
The Irish Wildlife Trust