



Open Letter to the President of the Maldives, Minister of Fisheries and Ocean Resources and Minister of Tourism and Environment

To His Excellency President Dr. Mohamed Muizzu, Honourable Minister of Fisheries and Ocean Resources Mr. Ahmed Shiyam, and Honourable Minister of Tourism and Environment Mr. Thoriq Ibrahim,

The undersigned 60 local and international organisations and 50 scientists urgently call on the Government of the Maldives to halt plans to re-establish a gulper shark fishery. We have carefully reviewed the draft management plan and regulation and concluded that the proposal would provide minimal benefits to a small number of actors while causing irreversible harm to local populations of gulper sharks and to fishers who rely on a healthy ocean for their livelihoods, as well as to the tourism sector that underpins the Maldivian economy.

Gulper sharks are intrinsically vulnerable to overexploitation. Their slow growth and reproductive rates, and the restricted availability of suitable habitats in Maldivian waters create a population dynamic that cannot sustain fishing pressures. The historical record in the Maldives shows a rapid boom-and-bust for this fishery, with collapses occurring within only a few years, and there is no scientific evidence that populations have recovered from the estimated 97% decline caused by overfishing in the past. Given the limited habitats, any remaining stocks are likely small and unable to withstand renewed exploitation. All three gulper shark species present in Maldivian waters are listed as Endangered on the IUCN Red List. Without a stock assessment, or at minimum a precautionary, multi-decade recovery projection, reopening this fishery is both scientifically unsound and contravenes with the Fisheries Act's requirement to apply the precautionary approach and manage resources using the best available science (Fisheries Act, Chapter 2, Clauses 3 and 5).

The Fisheries Act also requires broad participation by Maldivians in decisions affecting fisheries resources and mandates participatory decision-making (Chapter 2, Clause 5), good governance and transparency (Chapter 2, Clause 7). It is therefore deeply troubling that the Ministry appears not to have conducted meaningful consultations with key stakeholders, including local tuna fishers, tourism operators, civil society organisations and independent fisheries or shark scientists. No public records exist of who was consulted, the substance of those consultations, or any socio-economic impact assessments. Media reporting indicates that stakeholders consulted in Haa Dhaalu Kulhudhuffushi—including fishers—did not support this fishery ([link](#)). Independent polling by Blue Marine Foundation, Maldives Resilient Reefs and the Miyaru - Shark Programme (October 2025; n=1,000) found 77% of Maldivians opposed to resuming this fishery ([link](#)). More than 19,000 local and international signatories have added their names to petitions urging the Government to abandon this proposal ([link](#)).

Reinitiating the gulper shark fishery also poses substantial legal and market risks. If gulper sharks are listed on CITES Appendix II at the upcoming COP20 meeting in November-December 2025, exports of any gulper shark and their derivatives would require a scientifically grounded Non-Detriment Finding (NDF) as well as catch and trade quotas. In the absence of current stock data, and given past population collapses within only a few years, obtaining a positive NDF for sustainable international trade is highly unlikely. Fishers who invest to

reinitiate this fishery would therefore risk severe financial losses once CITES measures take effect, as resulting trade restrictions could render their operations economically unviable. Continued exports under these conditions would risk non-compliance with CITES and could trigger a Review of Significant Trade process, potentially leading to trade suspensions or export bans. This outcome would expose fishers and exporters to regulatory uncertainty and stranded investments. As Minister Thoriq Ibrahim noted at the launch event of the [Global Coalition to Halt the Extinction of Threatened Sharks and Rays](#) at UNOC3 (Nice, 2025), the Maldives has committed to a comprehensive shark sanctuary—an international conservation stance that would be compromised by non-compliant trade.

The proposed management measures themselves are inadequate. They include no phased fishing effort, no vessel-level catch or effort limits, and no clear, independently verifiable system to monitor and account for bycatch, despite acknowledging that other shark species have historically been taken by longline gear. As a vertical bottom-set longline fishery using baited hooks, this fishery would inevitably cause substantial bycatch of other sharks, including silky sharks (crucial for the Maldives' one-by-one tuna fishery) and other threatened pelagic sharks that underpin the growing dive industry. Given the Maldives' geographical dispersion, previous management plans have proven difficult to implement and enforce, raising serious doubts about the practical feasibility of effective monitoring, control and surveillance under the proposed framework. The advisory board's composition consisting of only a single conservation representative fails to provide the independent scientific scrutiny or stakeholder balance necessary for responsible governance.

In light of the scientific, socio-economic, and governance concerns outlined above, the undersigned organisations and experts respectfully recommend the Government of the Maldives to:

- ***Immediately suspend*** any plan to reopen gulper shark fishing and apply the ***precautionary principle*** as required under the Fisheries Act (Chapter 2, Clause 3), acknowledging the absence of stock assessments, the species' high vulnerability, the historical record of rapid population collapse, and increasing ocean pressures from climate change.
- Ensure ***fully transparent, documented and inclusive stakeholder consultations*** that include local fishers, civil society, independent scientists, market actors and tourism operators (in line with Chapter 2, Clause 5 of the Fisheries Act) and publish all data, consultation records and analyses related to this proposal and any decisions thereon.
- ***Reaffirm the Maldives' commitment to its Shark Sanctuary***, established in 2010, as a regional and global model of marine conservation and sustainable ocean governance and as a vital contributor to the country's blue economy.

The undersigned stand ready to support science-based measures that protect marine biodiversity, safeguard livelihoods, and preserve the Maldives' tourism reputation. The nation's well-being and the sustainability of its world-class tuna fisheries depend on healthy, biodiverse, and resilient oceans. We urge you to act now to prevent irreversible harm.

Sincerely,

Supporting Local Organisations



Supporting International Organisations



Supporting International Organisations



Supporting Shark and Fisheries Scientists

1. Aminath Shaha Hashim, Executive Director, Maldives Resilient Reefs
2. Maesha Mohamed, President/ Co-Founder, Maldives Manta Conservation Programme
3. Hamna Hussain, Co-Founder and Vice President of Miyaru - Shark Programme, Shark Conservationist
4. Dr Judith Brown, Projects Director, Blue Marine Foundation
5. Max Bello, Marine Policy Specialist, Blue Marine Foundation
6. Arzucan Askin, Co-founder of Miyaru - Shark Programme, National Geographic Explorer, Rolex Scholar
7. Dr Iris Ziegler, Head of Fisheries Policies and Ocean Advocacy at German Foundation for Marine Conservation
8. Brittany Finucci, Adjunct Researcher, University of Tasmania, Australia
9. Luke Warwick, Director, Shark and Ray Conservation, Wildlife Conservation Society
10. Daniel Fernando, Co-Founder and Director, Blue Resources Trust
11. Stan Shea, Marine Programme Director, BLOOM Association Hong Kong
12. Guy Stevens, Chief Executive/ Founder, Manta Trust
13. Alex Antoniou, PhD., Chief Executive/ Founder, Fins Attached Marine Research and Conservation
14. Fernando Reis, Executive Director, Sharks Educational Institute
15. Juan Martín Cuevas, Coordinator, Sharks and Rays of Patagonia, Wildlife Conservation Society Argentina
16. Carlos J Polo Silva, Director, Sharky Management & Consulting
17. Dr Cassandra Rigby, Adjunct Senior Research Fellow, James Cook University
18. Lee Crockett, Executive Director, Shark Conservation Fund
19. Paul Cox, CEO, Shark Trust
20. Dr. Martina Gaglioti, Marine researcher and educator, IUCN CCC, CEC, WCPA Member
21. Matthew Collis, Senior Director, Policy, International Fund for Animal Welfare (IFAW)
22. Jorge Serendero, Director, For the Oceans Foundation, OOWC One Ocean Worldwide Coalition
23. Pamela Nylund, Head of International cooperation, SHARKPROJEKT international
24. Matthieu Lapinski, President, AILERONS
25. Sonja Fordham, President, Shark Advocates International
26. John Baker, President, WildAid
27. Mark Bond, Research Assistant Professor, Florida International University
28. Callum Roberts, Professor of Marine Conservation Centre for Ecology and Conservation, University of Exeter
29. Dr. Julia Spaet, Shark Scientists, rreef and University of Cambridge

Supporting Shark and Fisheries Scientists

30. Stuart Pimm, Doris Duke Professor of Conservation, Duke University
31. Dr Julie Hawkins, Ecology and Conservation, University of Exeter
32. Dr Robert S. Steneck, Professor Emeritus of Oceanography, Marine Biology and Marine Policy, University of Maine
33. Dr Enrico Gennari, Director – Oceans Research Institute, Honorary Research Associate - the South African Institute for Aquatic Biodiversity (SAIAB), Research Associate - Department of Ichthyology and Fisheries Science (DIFS), Rhodes University
34. Vyv Summers, Senior Research Technician at the Marine Futures Lab, The University of Western Australia
35. Fabián Pina Amargós, Marine Scientist with Research and Management on Sharks and Rays
36. Dr. Lauren Dykman, Postdoctoral Fellow, University of Victoria/ Restoration Science Lead, The Kelp Rescue Initiative
37. Claire Nouvian, Founder & Director of BLOOM
38. Dr. Yvonne Sadovy, University of Hong Kong (ret.)/ IUCN Groupers and Wrasses Specialist Group Chair
39. Dr. Gonzalo Pérez-Rosales, Hong Kong University of Science and Technology
40. Dr. Katrina Himpson, BVM&S MRCVS
41. Amy Cartwright
42. Dr. Jean M Harris, Strategic Ocean Lead, WILDOCEANS Programme
43. Taïme Smit Pellure, Co-funder and President, Acción Océanos
44. Robert S. Steneck, Professor Emeritus of Oceanography, Marine Biology and Marine Policy, School of Marine Sciences, University of Maine
45. Ellen Pikitch, Endowed Professor of Ocean Conservation Science
Institute for Ocean Conservation Science, School of Marine and Atmospheric Sciences, Stony Brook University
46. Prof. Amanda Vincent, Ph.D. FRSC, Director, Project Seahorse; Professor, Institute for the Oceans and Fisheries; Chair, IUCN SSC Marine Conservation Committee; Chair, IUCN SSC Seahorse, Pipefish and Seadragon Specialist Group
47. Paolo Cortelezzi, PhD Candidate - Marine Futures Lab, The University of Western Australia
48. Tamara Figueredo Martín, Environmental economist Scientist with research and management on sharks and rays
49. Alfredo Quarto, Program and Policy Director/Co-Founder, Mangrove Action Project
50. Jim Enright, CBEMR Trainer & Advisor, Mangrove Action Project