



CCAMLR PO BOX 213, NORTH HOBART, TASMANIA 7002 AUSTRALIA
181 MACQUARIE STREET, HOBART, TASMANIA 7000 AUSTRALIA
Website: www.ccamlr.org

Phone: (61) 3 6210 1111
Fax: (61) 3 6224 8744
Email: ccamlr@ccamlr.org

Friday 11 January 2013

Mr John Scanlon
Secretary General
Convention on International Trade in Endangered Species of Wild Fauna and Flora,
International Environment House
Chemin des Anémones
CH-1219 Châtelaine
Geneva
Switzerland

Dear Mr Scanlon,

Thank you for your letter of 16 November 2012 concerning proposals to amend CITES Appendices I and II. The CCAMLR Secretariat submits the following comments in relation to the proposal to include *Lamna nasus* in CITES Appendix II. I expect individual CCAMLR Members to submit additional or supplementary comments to you directly.

Lamna nasus is not a target resource in the CCAMLR Convention Area with CCAMLR records showing a total trawl by-catch over the past 10 years of 3,135kg from Division 58.5.2 (western Indian Ocean) and Subarea 48.3 (southwest Atlantic Ocean) and a longline by-catch of 80kg over the same period (CCAMLR Statistical Bulletin, <http://www.ccamlr.org/en/document/publications>). CCAMLR's Conservation Measure 32-18 adopted in 2006 (<http://www.ccamlr.org/en/conservation-and-management/conservation-measures>), prohibits directed fishing for sharks, other than for scientific purposes, in the Convention Area until such time as CCAMLR's Scientific Committee has undertaken an assessment of the potential impacts of directed fishing for sharks. The Measure provides that any by-catch of shark, especially juveniles and gravid females, taken incidentally in other fisheries, shall, as far as possible, be released alive. On this basis, the text in Section 2, paragraph 2.2 of the draft proposal should be amended along the following lines: "Exploitation of smaller stocks in the Southern Hemisphere Oceans, **outside of CCAMLR's Convention Area**, is largely unmanaged and unlikely to be sustainable". This is referred to in the proposal at Section 8.1 (paragraph 3) where it would be useful to record that coordination for the management of *Lamna nasus* in the Southern Ocean will also involve the recently established South Pacific Regional Fisheries Management Organisation (SPRFMO).

In a similar vein, the title for Section 4.4.2 "Southern Ocean" should be revised to "Southern Ocean **outside the CCAMLR Convention Area**". This is because Section 4.4.2 draws from Clark and Harley (2010) which focusses on tuna and billfish fisheries. These fisheries do not extend south into the CCAMLR Convention Area in the Southern Ocean.

Paragraph 5.2 is misleading. *L. nasus* are not part of any "important but largely unreported secondary fisheries" in the CCAMLR Convention Area. The information set out in van Wijk and Williams (2003) indicates a very low catch, and states that, "Live porbeagles are released where possible, however their survival rate is unknown." and that "Porbeagle catches will be

monitored closely over future fishing seasons". CCAMLR requires its members to provide comprehensive reporting of all target and by-catch species and there are move on rules for some species.

With both low catches of *L. nasus* and 100% scientific observer coverage on licensed vessels in the CCAMLR Convention Area, the above contention is not supported.

Finally, in relation to your 11 December 2012 invitation to observe the 16th Conference of the Parties, 3-14 March 2013, although the CCAMLR Secretariat will not be represented we expect many CCAMLR Members to be represented. We wish you well for a productive meeting.

I hope these comments are useful.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'A. Wright'.

Andrew Wright
Executive Secretary

cc Dr Christopher Jones, Chairman, CCAMLR Scientific Committee
(chris.d.jones@noaa.gov)