



Australian Government

Australian Fisheries Management Authority

13 July 2011

File No: F2011/0494

Manager, Fisheries Policy and Environment  
Department of Agriculture Fisheries and Forestry  
GPO Box 858  
Canberra ACT 2601

Dear Sir/Madam

**Australia's Draft 2011 National Plan of Action for the Conservation and Management of Sharks (Shark-plan 2)**

Thank you for the opportunity to comment on **Australia's Draft 2011 National Plan of Action for the Conservation and Management of Sharks (Shark-plan 2)**.

AFMA is fully committed to the sustainable management of shark species and welcomes the preparation of Shark-plan 2. AFMA's Ecological Risk Assessment (ERA) process identified 73 species being identified as being at 'high risk' from fishing. Of these 19 were sharks and rays. Accordingly, AFMA is well aware of the need to address shark management issues.

Although generally supportive of the direction that Shark-plan 2 has adopted there are a number of issues on which I would wish to comment.

One of the criticisms of **Australia's 2004 National Plan of Action for the Conservation and Management of Sharks (Shark-plan 1)** was that it attempted to address too many issues without identified sources of funding. I have similar concerns about Shark-plan 2.

Shark-plan 1 listed 18 issues and identified 43 actions to address them. Despite attempts to make Shark-plan 2 more focused it still identifies 15 issues and puts forward 35 actions to address them. While to some extent this reflects the lack of progress in addressing some issues from Shark-plan 1 it is still a very ambitious undertaking in the current economic climate especially when no additional sources of funding are identified. Shark-plan 2 notes that the actions within the plan are expected to be achievable within the existing budgets of fisheries management and conservation agencies. From an AFMA perspective this is very challenging.

Canberra Office  
Box 7051  
Canberra Business Centre ACT 2610  
Phone: (02) 6225 5555  
Fax: (02) 6225 5500  
ABN 81 098 497 517

Darwin Office  
GPO Box 131  
Darwin NT 0801  
Phone: (08) 8943 0333  
Fax: (08) 8942 2897

Thursday Island Office  
PO Box 376  
Thursday Island QLD 4875  
Phone (07) 4069 1990  
Fax (07) 4069 1277

At a more detailed level some issues and activities have been proposed that were not picked up in the review of Shark-plan 1. A good example of this is the issue of reducing cryptic fishing mortality of shark species. While this would be a nice thing to do, giving it a high priority risks diverting limited research funds from more important areas of research, such as risk assessments of shark stocks not already assessed and reliable assessments for shark bycatch and byproduct. Other examples include assessment of the adequacy of management for all shark species and more innovative approaches to dealing with identified shark management issues and assessment of shark handling practices for the conservation and management of sharks.

AFMA looks forward to continuing to work with DAFF on the development of Shark-plan 2.

If you to discuss this matter or require more information please contact Paul Ryan, AFMA's Environment Manager by e-mail at [paul.ryan@afma.gov.au](mailto:paul.ryan@afma.gov.au), on phone 02 6225 5366 or mobile 0412 552 395.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sally Troy', with a long horizontal flourish extending to the left.

Sally Troy  
Acting Executive Manager  
Fisheries Management Branch