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11 July 2011

MANAGER, FISHERIES POLICY & ENVIRONMENT
DEPARTMENT OF AGRICULTURE FISHERIES & FORESTRY
GPO BOX 858
CANBERRA ACT 2601

ATTENTION: MANAGER, FISHERIES POLICY & ENVIRONMENT

Dear Sir,

Re: AUSTRALIA'S DRAFT 2011 NATIONAL PLAN OF ACTION FOR THE CONSERVATION AND
MANAGEMENT OF SHARKS (SHARK PLAN 2)

I am very concerned about the lack of detailed measures to protect sharks and their habitat in the new Shark Plan 2 released by the government.

For example:

Issue 5

Shark plan 1 – Continued effort to maintain and improve the standard of stock assessments for target shark species in dedicated shark fisheries.

Shark plan 2 – The need for abundance indices and stock assessments are identified as an area for further development for target and byproduct species.

We already know that shark populations are collapsing around the world. Yet here in Australia we continue to hunt sharks for their fins and flesh. Shark fishing is an unsustainable industry because many species of sharks are endangered and critically endangered.

Plus the 'management' and 'monitoring' of shark fishing in dedicated shark fisheries is known to be unreliable.

In contrast to Australia, many other countries are looking after their sharks. The Bahamas, Palau and the Maldives have declared shark sanctuaries in their waters. Hawaii and Guam have made shark finning and the trade in shark fins illegal.

Issue 9

Shark plan 1 - Reduce cryptic fishing mortality of shark species.

Shark plan 2 – While cryptic mortality is not explicitly covered by Shark plan 2, it does discuss the high levels of uncertainty about post release survival and more effective shark bycatch mitigation methods.

Definition of 'cryptic' is as follows: secret, mysterious, obscure

What does this Shark plan 2 rhetoric actually mean here? Does this suggest that the post-trawling or post-fishing carnage from either commercial or recreational fishing, that is, unwanted or illegal bycatch, is thrown back with gaff punctures, tackle embedded in their bodies, hooks in their mouths probably to starve and endure other agonizing deaths post release. I would predict shark & other bycatch survival rate would be nil.

Issue 14

Shark plan 1 – Reduce or where necessary eliminate shark bycatch.

Shark plan 2 – Advocates **'more effective bycatch mitigation methods'** so that the impact of fisheries on non-target stocks should be as little as possible.

What does this actually mean? How exactly is this 'action' actually going to be achieved? Who is going to fund the extra policing of commercial trawlers & recreational fishing boats to check on fishing quotas and illegal catch?

Australia needs to emulate the tenacity that the Sea Shepherd crew demonstrated against the Japanese whaling fleet, to police overfishing and illegal shark finning.

There are nearly 20 equally nonspecific recommendations and findings from Shark plan 2. Each of which will achieve nothing to protect sharks in Australian waters. Shark plan 2 also lacks funding to support the implementation of measures to increase shark protection.

According to the International Union for Conservation of Nature (IUCN) Shark Specialist Group, the first study, to determine the global conservation status of 64 species of open ocean sharks and rays, revealed that 32 per cent are threatened with extinction primarily due to overfishing. Therefore it is imperative that endangered and critically endangered species of sharks and rays be fully protected (www.iucn.org).

Australia must also restrict the importation of shark products derived from unsustainable and illegal fisheries so that the international trade in shark fins is reduced. The hope being to, one day, achieve a global ban on the shark-fin and shark product trade.

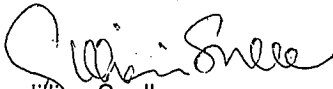
The loss of sharks, one of the apex predators, in the marine environment, can cause drastic changes, for example, scientists have found that declines in sharks can contribute to a shift from healthy coral-dominated reefs to barren algae-dominated reefs (www.pewtrusts.org).

It has been demonstrated in Palau that shark tourism can contribute almost US\$2 million in a shark's lifetime to an economy. If more countries can embrace these creatures for their benefit to the ocean and their value to a country's financial well being, then not only will the value of shark tourism exceed that of shark fishing, sharks may also be rescued from extinction (Million-dollar Reef Sharks, an Economic Driver for Palau- PEW Environmental Group).

In conclusion, Australia is firmly out of step with growing international recognition of shark protection and of the importance of marine sanctuaries as the most effective way of protecting our sharks and other marine life.

Australia, therefore, requires **funding** and **government commitment** in the 2011 NATIONAL PLAN OF ACTION FOR THE CONSERVATION AND MANAGEMENT OF SHARKS (SHARK PLAN 2) which is clearly not offered in this inept document presented by this government.

Yours faithfully,


Jillian Snell

cc Senator Joe Ludwig, Minister for Agriculture & Fisheries, G.P.O. Box 228, Brisbane, Qld 4001

Australian Marine Conservation Society, Mr Darren Kindleysides, P.O. Box 5136, Manly Qld 4179.