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Executive Manager,
Sustainable Resource Management Division
Department of Agriculture Fisheries and Forestry
GPO Box 858
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Dear Mr Thompson,

I refer to your advice of 12 May 2011 regarding the public release of the draft 2011 *National Plan of Action for the Conservation and Management of Sharks* (NPOA II) and appreciate the opportunity to provide comment and express our views on the conservation and management of sharks during the term of this plan.

Firstly, I would like to recognise the significant efforts and resources used to assess the current status of sharks within Australia, to review the previous NPOA and develop the draft NPOA II. Northern Territory Fisheries is committed to ensuring the sustainable use of shark resources and have managed these resources in accordance with the previous NPOA and the sustainability guidelines of the *Environment Protection and Biodiversity Conservation (EPBC) Act*.

Overall I note that the Shark Assessment Report (SAR 2) and the Review of Australia's 2004 NPOA I: Final Review Report (hereafter referred to as the Review), recommended that "resourcing the implementation of actions, monitoring and evaluation would be key to the effectiveness of the NPOA II". However, I see no resolution of this issue of resourcing or of monitoring the effectiveness within the actions or strategy of the NPOA II. In addition, the Review advised that the new plan should be given "more authority, credibility, and enable improved management and research coordination through a range of mechanisms". Nevertheless, I can see no actions or supporting administrative arrangements that address this advice and suggest that the Commonwealth Government conducts a review of the resourcing arrangements for NPOA II and the capabilities of the states to meet these agreements.

In the previous NPOA, there was significant emphasis on the need to quantify, consider and mitigate the impact of Illegal, Unreported and Unregulated (IUU) fishing. Although it has been demonstrated that there is less foreign fishing incursions than during the life of NPOA I, IUU still poses a significant threat and does not just include foreign fishing. The Northern Territory notes that it is essential that the existing actions that address stock assessments and research specifically factor in IUU fishing.

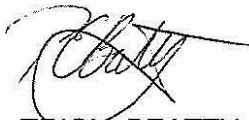
The issues and actions outlined in the draft NPOA II will help to ensure that the management of Australian sharks meets our international and national commitments. However, I believe that there are some actions that could be further enhanced to more comprehensively address the stated issue. For example, Issue 1 of the draft NPOA II outlines a number of actions aimed at improving identification of harvested sharks. The actions outlined in the response propose identification guides and similar identification tools to address this issue. However, the improved identification of sharks is not solely about identification kits or tools. For instance, I would suggest that the shark identification issue should include a strategy to improve the motivation of fishers to identify sharks.

In general, the draft NPOA II is a sound action plan for the conservation and management of sharks in Australia; however, to enhance its ability to deliver greater value to its goals, I would recommend that it is appropriate that:

- The Commonwealth Government conduct a review into the resourcing and accountability arrangements for NPOA II;
- The existing actions be amended to address IUU fishing; and
- Further discussion be instigated regarding enhancement of existing actions to address all aspects of each Issue.

If you wish to discuss any aspect of our position on this matter or require further clarification on the information above, please contact Ms Tricia Beatty, Aquatic Resource Manager on (08) 8999 2393.

Yours sincerely



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20 July 2011