

1 Cairo Street
South Coogee NSW 2034
9th July 2011

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

Re : Submission on Shark-plan 2

Dear Sir / Madam

*** The obvious need for an effective plan.**

I write as a member of the public. I think we are increasingly being made aware in the media of a potential disaster in overall fish stocks, and as part of this the huge take from shark fishing around the world. Clearly the decimation of this predator species would be devastating to 'aquatic biodiversity and ecosystems'.

The Foreword to Draft-Shark-plan 2 therefore seems encouraging. It rings with words that give hope - 'conservation and management of sharks', 'long-term sustainability', 'minimise undesirable impacts', 'Australia is a world leader in the ecologically sustainable use of natural resources'. There has to be hope in these statements, and yet, underlying this confidence is **the reality that all is not well**, that clearly **the true picture is not known**. The call for improved data collection, with 'better communication among government agencies' and 'more informed decision- making' must show this.

*** Problems from lack of funding?**

The issues listed in Shark-plan 2 read as a very sensible approach for putting some strong steps in place. However, all this must be undercut by the statement on p.27 that '**there is no dedicated budget..**' for putting these plans into practice. **To hope that these outcomes can be achieved within existing budgets could surely be questioned.** Exactly how are fisheries going to be convinced to comply diligently with these steps? How do conservation agencies endlessly stretch their budgets? **Surely this has to be a serious undermining of the whole Shark-plan 2, or an aspect of the plan that must be addressed.**

*** Shark Finning.**

Over the last summer the Maritime Museum in Sydney presented an exhibition about sharks, 'Predator or Prey'. A part of this exhibition dealt with finning. Graphic film showed the cruel reality and the waste of this practice. While Shark-plan 2 deals with this in Issue 3, this must be an aspect crying out for more. You can't help but think that this trade should have been ended decades ago! Clearly, without funding, enforcing regulations will be very hard. **The easy solution is to ban the sale of shark-fin product in Australia, to ban both the import and export of shark fin.**

There are international precedents for this. From January 2011 the USA has prohibited shark finning by U.S. vessels in U.S. waters, under the U.S. Shark Conservation Act. As well the U.S. can block seafood imports from countries that permit shark finning. The State of Hawaii has

enacted shark-fin-ban legislation. This has motivated concern in Canada, Ireland, Hong Kong, and island nations such as the Maldives.

Australia has cultural issues with animal cruelty. The public outrage at the cruelty shown in connection with the live cattle export trade, Australian opposition to whaling and presumably the sale of whale products clearly show this. It is not only CITES listed species that would not be sold in Australia. Why then should shark-fin products be available? No excuses of 'free-trade agreements' or the practices of other cultures' should be used. Even Action 31 in this document allows for Australia to 'act internationally' (in regard to shark by catch measures here,) so why not for finning?

* **Critically endangered species.**

The outline provided in this plan looks positive and comprehensive. The question remains however, **will these measures in fact be acted upon? In some cases at least there must be absolutely no time to waste.**

Grey Nurse Sharks.

Magic Point, south of Maroubra Beach, is a critical habitat for Grey Nurse sharks. Randwick Council runs education programmes, especially for children. The NSW Fisheries Department is responsible for monitoring the site. Dive groups are able to go out and experience diving near these sharks.

Clearly Grey Nurse Sharks are a species in a desperate position. Despite this, the recently elected NSW Government revoked protections against the hooking of these sharks in the critical habitat at Fish Rock and Green Island, on the NSW mid-north coast. John Jeayes from Port Macquarie wrote to *The Sydney Morning Herald* on 2nd May 2011, 'Fish Rock is not only the top aggregation site for this state, it also is the site with the highest number of embedded hooks in sharks recorded on the east coast..' (And this even despite some protections.)

Obviously the NSW Government has its reasons for these changed attitudes to Marine Parks and recreational fishing. Is this Shark-plan 2 able to over-ride changes to State Legislation that could be harmful to endangered shark species?

A travel article in the *Sunday Telegraph* of 20th February 2011 described a diving 'adventure' at Fish Rock. Many cautionary details are included in the last part of the article. Grey Nurse Sharks have enjoyed total protection since 1984 along the NSW coast. However, 'Fishing, netting and habitat disturbance have reduced Grey Nurse numbers to the point where the International Union for Conservation of Nature lists them as endangered... As slow breeders, there is little hope they will recover their numbers any time soon.' The article also points out there are heavy penalties for interfering with the sharks at the nine aggregation sites along the NSW coast, but of course that might be a changed situation now?

Another travel article from the same paper looked at **Whale Sharks** at Ningaloo Reef. Even here there is a warning. 'In spite of being officially protected in several countries including Australia whale sharks remain classified as 'vulnerable to extinction'. The most significant threat to their existence is humans, through **fishing for flesh and fins**, boat strikes or pollutants such as plastic bags.' **Do some countries really kill whale sharks for fins? In contemporary Australia they seem to be as iconic as whales.** It is obvious that there is **increasing interest in living sharks**, if there has to be an economic incentive to protect them.

* **Conclusions.**

This plan states that it is looking to the importance of protecting 'aquatic biodiversity and ecosystems'. The economic importance of Fisheries is obviously important within this plan too. I believe that **we need to be assured that there is more than just hope in this document, that there will be a sustainability** for all important elements as a result of this National Plan, **with clearly regulated and enforced protection in place.**

Yours sincerely

Vivien Ward