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Sent by email to: Sharkplan2@daff.gov.au



**Conservation
Council SA**

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Dear Sir/Madam

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

As the peak conservation body for South Australia, the Conservation Council of South Australia (Conservation Council SA) welcomes the opportunity to comment on the Shark-plan 2

Conservation Council SA is an independent, non-profit and strictly non-party political organization representing over 50 of South Australia's environment and conservation organizations and their 60,000 supporters. Conservation SA has developed a comprehensive view of environment policy in "South Australia in a Changing Climate: A Blueprint for a Sustainable Future"

(<http://www.conservationsa.org.au/blueprint.html>) This document sets out, at a strategic level, policy positions in six key environmental areas, including coast and marine.

General comments

Conservation SA believes the draft Shark-plan 2 lacks sufficient focus on shark conservation measures and will therefore do little to alleviate the continued threats they currently face. This lack of focus on conservation is highlighted by the fact that developing strategies for the recovery of shark species and populations (Issue 13) is only medium priority; and reducing or, where necessary, eliminating shark bycatch (Issue 14) and better understanding the effects of shark fishing etc on ecosystem

structure and function (Action 15) are Medium-Low priority. In our view, these are clearly high priority issues.

The plan does not address some key conservation issues, namely:

- The need for comprehensive trade codes for the export and import of shark products. The latter must include restrictions on products not derived from sustainable fisheries, with the onus on the relevant fisheries to demonstrate their sustainability; and
- The need for identification and protection of critical habitats for all shark species listed under commonwealth, state and territory legislation and/or listed on the IUCN Red List or the appendices to the Convention on Migratory Species and the Convention on International Trade in Endangered Species.

Further, the Review of Shark-plan 1 found that "There are few examples of comprehensive, formal education or engagement strategies in the jurisdictions - despite identified need for better information on community views and how best to engage with communities and stakeholders on shark management issues... No evidence of social research examining stakeholder/community awareness of the importance of shark conservation and management was obtained."

This Shark-plan 2 should be improved to contains actions related to this issue as per Action 37(a) of Shark-plan 1 ("Introduce a community education strategy aimed at the general public, commercial, recreational, Indigenous and game fishers. The strategy should aim to: (a) raise national awareness of the vulnerability of particular shark species and in particular their role in the marine ecosystem, current threats and status, the cumulative impact of shark bycatch, the need to return sharks to the sea and to maximise their chances of survival and of safe swimming and safe diving guidelines")

Actions involving community education and engagement in shark conservation should be an integral part of Shark-plan 2. Funding for such actions could be readily available by including them as eligible, or ideally, priority activities under the Caring For Our Country funding programs.

The failure to include conservation sector representatives on the Shark-plan Implementation and Review Committee is also of serious concern. The inclusion of representative from this sector would increase the knowledge base of the Committee as well as its transparency and accountability.

Comments on specific actions

Issue 1: Improved identification of shark species by all resource users

Action 1 should be changed to "Review existing shark species identification guides (and any in development) and implement the best available identification guides in all relevant fisheries". The current wording "with a view to implementing" is virtually meaningless.

Issue 3: Full utilisation of dead sharks and an improved understanding of the markets for and trade in shark products

Action 6 should be changed to: "Where it is not currently the case, all jurisdictions should immediately enact requirements for all sharks to be landed with fins naturally attached" and made a high priority. Failure to do so makes a mockery of a plan supposedly relating to the conservation of sharks and makes Australian open to ridicule at the international level.

Issue 4: Coordination of shark research

Action 9 should be strengthened to read "Ensure opportunities are available for collaborative research initiatives to address aims and objective of Shark-plan 2."

Issue 8: Improved understanding of the impacts of and, where required, implementation of better management for, recreational and game fishing

Game fishers in particular are known to target larger 'fighting' sharks eg mako's. Given the key apex predator role of these sharks, management measures for these fisheries must be strengthened. For example, in SA there are currently only bag, boat or size limits for gummy and school sharks. The fact that these fisheries can still take the EPBC listed school shark is also of major concern. For these reasons, we believe this issue should be high priority.

Issue 12: Risk assessments for all shark species from all impacts on those species

The CSIRO/AFMA Ecological Risk Assessment is in our view the appropriate assessment method and should be used in assessing risk to shark species in all jurisdictions.

Issue 14: Reduce or, where necessary, eliminate shark bycatch

The related actions should specifically include implementing and trialling the findings in Patterson, H.M. and Tudman, M.J. 2009. Chondrichthyan guide for fisheries managers: A practical guide to mitigating chondrichthyan bycatch. Bureau of Rural Sciences and Australian Fisheries Management Authority, Canberra

Conclusion

The draft Shark-plan 2 lacks focus on conservation action and needs to be strengthened in this area if it is to be effective. This must include both a resourcing plan and the commitment of funding. Failure to do so will virtually ensure that little real change will occur and that the current threats to sharks will continue and potentially increase.

Yours sincerely

A handwritten signature in black ink that reads "Tim Kelly". The signature is written in a cursive style with a large initial 'T' and 'K'.

Tim Kelly

Chief Executive, Conservation Council SA