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## GREAT WHITE SHARKS – WHERE SCIENCE STOPS, HYPE BEGINS

**COP 13 Bulletin 4**

***The SMS recommendation on Great White Sharks is to REJECT the proposal. It does not meet the criteria for Appendix II and the current listing on Appendix II with an appropriate annotation is more than adequate. The new information document (CoP Inf. 51) is hype rather than science and adds nothing of substance to the proposal. It strengthens SMS's view that this proposal does not meet the criteria and should be REJECTED.***

The "new" information (CoP13 Inf. 51) is a joint lobbying effort by Australia, Wildlife Conservation Society, Defenders of Wildlife and Humane Society International. The document has the same flaws as the original (Prop. 32), but there are two central problems:

1. The technical validity of the original proposal was challenged seriously by some of the world's leading experts in fisheries biology and management (see document CoP13 Inf. 36 Appendix E). Their concerns have been ignored.
2. Neither the original proposal (CoP 13 Prop. 32), the new information document (CoP13 Inf. 51) nor the expert review (Cop 13 Inf. 36) identifies any targeted fishery for Great White Sharks. The claim that demand for teeth and jaws will stimulate a targeted fishery cannot be verified. In reality the commercial elements of the trade are trivially small and not enough to stimulate a targeted fishery.
3. International trade in Great White Sharks is nothing more than trade in by-products (teeth, jaws fins) from a species caught as by-catch in other fisheries. Banning trade will not impact on Great White Shark fisheries, because none exist - so no conservation advantage can accrue. With DNA analysis needed to identify Great White Shark meat in trade, serious trade regulation problems must be expected. The species is best left on Appendix III with annotations to ensure better trade data are collected.

### **SNAPSHOT OF THE NEW INFORMATION PAPER ON GREAT WHITE SHARKS (CoP13 Inf 51)**

**Teeth and Jaws for Sale.** The information presented in CoP 13 Inf. 51 confirms that the value of teeth and jaws stated in the proposal (CoP 13 Prop 32) are grossly inflated:

4. A list of advertisements tells us only that some people try to sell teeth and jaws on the internet. It does not establish any rate of sale or demand. That the two sets of jaws noticed for sale on 2 October are still for sale today suggests they are not in high demand at the asking price.
5. The "asking price" for a large set of jaws, from a 20' (6 m) long shark, is \$US12,500 - 25% of the grossly inflated \$US50,000 claimed in the proposal and repeated in CoP 13 Inf. 51 (page 30, question 3).
6. If the retail price for a set of giant jaws was \$US12,500, a fisherman may get a few thousand dollars at most. This is not enough reward for a targeted commercial fishery.
7. According to CoP 13 Inf 51 (page 30, question 3) large teeth sell for \$US1,150 each, so a giant set of jaws, with say 50+ large teeth, should be worth \$50,000 to \$60,000 in teeth alone ... not \$US12,500. The value of large teeth is at least 45% overstated, but the market for them is so limited that it is not economic to break a set of large jaws to sell the individual teeth!
8. The photographs of teeth in CoP13 Inf. 51 are not all from Great White Sharks. If the proponents of Prop. 32 cannot distinguish Great White teeth and jaws from other species, their claim that customs officers will be able to do so easily is not convincing.

**Single collections as evidence for demand.** The existence of a very small number of specialised collections of shark jaws does not establish that this is a serious commercial threat to Great White Sharks!

9. Australia estimates annual mortality of Great White Sharks in Australian waters as 500 specimens each year - by comparison, the number of jaws in a few collections is trivial.
10. The collections described in CoP 13 nf. 51 are well-known and have been built up over decades by a few enthusiastic collectors.
11. The photographs of the "collections" of jaws, following photographs of teeth and jaws for sale, is deceptive. The "collections" are not shops selling jaws as non-english speakers may deduce from CoP 13 Inf. 51.

#### **Questions about Great White Sharks.**

*The "question" and "answers" in CoP 13 Inf 51 are inaccurate and misleading.*

#### **12. Question 1. What is the population size of Great White Shark?**

At least some indication should have been provided. The wild population must at least be in the tens of thousands. Australia estimates its own population as 2,500<10,000 adults - which is not "small" according to the definitions in Annex 5 of Resolution Conf. 9.24 Rev. If Great White Sharks did comprise 0.5% (1 in 200) to 0.03 (1 in 3,334) of sharks caught in fisheries globally, as claimed, then population size must still be substantial.

#### **13. Question 2. Has the population declined substantially in recent years?**

The information given in the answer strives to paint a gloomy picture but ignores the expert assessment of the same population data contained in CoP Inf. 36 Appendix E.

#### **14. Question 3. Is the GWS affected by trade?**

The values for teeth (\$US1150 each) and jaws (\$US50,000 each) are both grossly inflated and misleading. No evidence indicates trade is driving the harvesting through targeted fisheries.

#### **15. Question 4. Are current rates of exploitation sustainable.**

Expert analysis (CoP 13 Inf. 36 Appendix E) considers the South African survey results consistent with sustainability. Australia has not presented monitoring results *since* protection

was introduced but anecdotal information from fishermen indicate the population across southern Australia is expanding.

**16. Question 5. *Is the GWS vulnerable to overexploitation?***

The IUCN and Australia both list Great White Sharks as "vulnerable", but neither of them consider them endangered due to trade or other factors.

**17. Question 6. *Does the GWS meet the criteria for Appendix II listing.***

The claim that Great White Sharks meet the criteria for Appendix I and II totally ignores the detailed scientific analysis carried out by expert (CoP13 Inf. 36 Appendix E), which concluded that the available evidence was not sufficient to confirm compliance with even Appendix II.

**18. Question 7. *Are there enough data to support an Appendix II nomination?***

Expert analysis (CoP13 Inf. 36 Appendix E) indicates there are not enough data. The claim that the precautionary principle should automatically trigger listing in such cases fails to understand either the precautionary measures (Annex 4 of Resolution Conf. 9.24Rev) or principle (see Document CoP 13 Inf. 44 on precautionary principle).

**19. Question 8. *Why upgrade from Appendix III to Appendix II?***

The claim that Great White Sharks may become threatened with extinction is unsubstantiated (see CoP Inf. 36) and there is no evidence whatsoever that Appendix II listing will improve the conservation status of the species

**20. Question 9. *What are individual countries doing to protect GWS?***

Protection at the national level is perhaps the most effective measure for this species and claims that this would be undermined by migration are unsubstantiated and possibly highly misleading. Claims that no recovery has occurred since protection are unsubstantiated - Australia has presented no data allowing evaluation of what has happened since protection.

**21. Question 11. *Why not leave shark management issues to other organizations such as FAO?***

Parties have made considerably more progress than stated in developing national plans-of-action on sharks, which is ignored here. This progress is summarised in CoP13 Doc. 35.

**22. Question 12. *Shark products are difficult to identify to the species level. Will we be able to effectively detect the presence of GWS being traded?***

That DNA testing is required to determine whether shark meat in international trade contains the flesh of Great White Sharks is hardly "readily recognisable". Identification difficulties will pose major problems if the species is listed on Appendix II.

**23. Question 13. *Do shark experts support an Appendix II nomination?***

"Shark experts" within various NGO's that obtain funds to research sharks obviously support the listing. This is the very reason that "criteria" for listing were developed. At least one eminent group of "experts" in shark biology and management do not support the listing (CoP13 Inf. 36 Appendix E).

For further information and a copy of the SMS "Guide to CITES" go to: [www.speciesms.org](http://www.speciesms.org)