



Zürich, den 14.Jun.2007

Dr. M. Lörtscher (Artenschutz)
Bundesamt für Veterinärwesen
Schwarzenburgstr. 155, Liebefeld
3003 Bern

Sehr geehrter Herr Dr. Lörtscher

Die Hai-Stiftung bittet Sie, als Vertreter der Schweiz bei CITES, um die Unterstützung der von Deutschland an der nächsten CITES Konferenz vorgeschlagenen Aufnahme der Dornhaie (*Squalus acanthias*) und Heringshaie (*Lamna nasus*) in den CITES Anhang II.

Beiliegend sende ich Ihnen einen Brief, der im Namen der nationalen Hai-Schutz Organisationen an die CITES Delegierten ihres Landes weitergeleitet wird. Im Brief finden Sie die Argumente und detaillierte Angaben, die klar für eine Aufnahme der Dorn- und Heringshaie in den CITES Appendix II sprechen.

Die Hai-Stiftung ist Mitglied der Shark Alliance und die offizielle Vertretung der Schweiz in der Europäischen Elasmobranchier Gesellschaft (European Elasmobranch Association, EEA). Wir stehen Ihnen sehr gerne bei Fragen mit unserer Expertise und unseren nationalen und internationalen Kontakten zu Hai-Wissenschaftlern zur Verfügung. Informationen zu Haien finden Sie auch unter www.hai.ch und www.shark.ch. Unsere E-Mail Adresse für Fragen ist: hai@hai.ch.

Mit bestem Dank für Ihre Unterstützung und freundlichen Grüßen

Dr. Alexander J. Godknecht
Präsident

Dr. M. Lörtscher (Artenschutz)
Bundesamt für Veterinärwesen
Schwarzenburgstr. 155, Liebefeld
3003 Bern

May 7, 2007

Dear Dr. Lörtscher

On behalf of the Swiss Shark Foundation / Hai-Stiftung, Shark Alliance and the European Elasmobranch Association, we are writing to request that Switzerland actively promote the listing of spiny dogfish (*Squalus acanthias*) and porbeagle sharks (*Lamna nasus*) under Appendix II of the Convention on International Trade in Endangered Species (CITES), as proposed by Germany on behalf of the European Community (EC), up to and throughout the Fourteen Conference of the Parties (CoP14) to CITES.

We take this opportunity to highlight several recent expert analyses that bolster the case for listing these vulnerable shark species under CITES: reports from TRAFFIC, IUCN (World Conservation Union) and independent consultants to the European Commission.

Spiny Dogfish Sharks (*Squalus acanthias*)

The IUCN (World Conservation Union) recently issued its analyses of the CITES proposals and has concluded that spiny dogfish meet the criteria for inclusion in Appendix II under Resolution Conf. 9.24 (Rev. CoP13) Annex 2a Criteria A and B. In its analyses, TRAFFIC further stated that the spiny dogfish listing is “clearly justified” and has recommended that Parties accept the EC listing proposal.

As you are likely aware, the European Commission ordered an expert analysis of trade in spiny dogfish and porbeagle sharks. The final report, released in March, concludes that:

- international trade accounts for a significant proportion of global demand for spiny dogfish
- 30% of spiny dogfish catches enter international trade (thought to be an underestimate)
- listing under Appendix II would have a demonstrable conservation benefit
- such listing would prevent the species from becoming eligible for Appendix I in the future, and
- listing is “likely to contribute directly to the conservation and management of this species.”

We remind you that spiny dogfish sharks are:

- exceptionally slow-growing species (lowest productivity category of FAO CITES listing criteria)
- taken in fisheries that target mature females and thereby damage population structure
- included on the IUCN *Red List of Threatened Species* as “Vulnerable” globally
- considered “Endangered” in the Northwest Atlantic, “Critically Endangered” off Europe
- subject to strong, persistent demand that drives targeted fisheries around the world
- inadequately managed in most places including the US and Canada, and
- not subject to any bilateral or international management measures

Porbeagle Sharks (*Lamna nasus*)

TRAFFIC has recently recommended that Parties accept the EC proposal for listing porbeagle sharks under CITES Appendix II while noting that some dramatic localized depletions of porbeagle shark meet the criteria for listing under Appendix I. IUCN has stressed international demand is a driving or an important contributing factor in most fisheries.

Although the European Commission trade analysis also found available data on porbeagle trade lacking, the report suggests consideration of the precautionary approach with regard to CITES and concludes that an Appendix II listing would offer significant potential benefits, such as essential improvements in:

- monitoring of international trade in porbeagle sharks
- data with respect to high seas porbeagle catches, and
- national and international management of the species.

We remind you that porbeagle sharks are:

- slow growing, vulnerable species (lowest productivity category of FAO CITES listing criteria)
- heavily exploited to satisfy international demand for their valuable parts
- highly prized for their meat and fins
- included on the IUCN *Red List of Threatened Species* as “Vulnerable” globally
- considered “Endangered” in the Northwest Atlantic, “Critically Endangered” off Europe,
- lacking national protections advised by scientists, and
- not subject to international management

Improvements in the management of fisheries and monitoring of trade for these shark species are urgently needed, but are not being provided under existing regimes. We recognize that an Appendix II listing would have little if any effect on EU dogfish and porbeagle fisheries or on rebuilding the seriously depleted stocks off Europe. We believe strongly, however, that Appendix II listing can prompt (or improve the effectiveness of) management action in countries currently exporting dogfish and porbeagle sharks from depleted populations, and can help ensure that developing fisheries for these species, that will supply European demand in the future, are sustainable.

We respectfully urge Switzerland to work to ensure the adoption of the spiny dogfish and porbeagle shark listing proposals up to and throughout the June Conference of the Parties to CITES.

Thank you for your consideration.

Sincerely,

Dr. Alexander J. Godknecht
Chairman