

DSCC Intervention to SPRFMO on SC Workplan

Jan 28 2021

We do want to express our concerns at the workplan as far as levels are concerned. We would like to see the instruction end at 'bycatch data'

That is for three reasons.

First, the UNGA resolutions do not call for, or contemplate, the destruction of VMEs to any level. They call for their protection. The question is how do we protect them - not how many do we sacrifice.

Second, the proposal ignores rare species, ignores connectivity between species and ecosystems and ignores uncertainties in defining VME ecosystems. It simply isn't scientifically possible or defensible to contemplate destroying certain VMEs, without also addressing the threats to individual species, other than modelled taxa, without taking into account connectivity and flows and without taking into account that defining ecosystems is notoriously difficult.

Third, the approach fails to manage for biodiversity. It would be possible to maintain numbers in certain taxa but still destroy or even drive to extinction other taxa, putting genetic diversity at risk.

Fourth, we do not have nearly enough data on the abundance and distribution of VMEs and taxa to be able to justify 80,90,95 or any other percentage. We have seen from Dr Roland Pitcher's work that the models are not able to predict abundance reliably, but even more fundamentally, it is a breach of the precautionary approach and the requirements of the SPRFMO Convention to manage vulnerable species and contemplate destruction of VMEs on the basis of a model in the absence of enough scientific data.