



This letter represents the views of Ornamental Fish International (OFI), the Ornamental Aquatic Trade Association (OATA), the Pet Industry Joint Advisory Council (PIJAC) and the European Pet Organization (EPO) who together represent the global trade in marine ornamental species.

We welcome this initiative on the conservation management of and trade in marine ornamental fishes initiated by the 18th Conference of the Parties to CITES earlier this year. If undertaken in a well-considered manner, we consider this an opportunity to achieve a viable and long-term sustainable future for our sector, a desire we all share and one which goes to the very heart of CITES. We would like to express our gratitude to Kim Friedman of FAO for his lead role in coordinating discussions about how to progress this initiative and encouraging a collaborative approach to it.

The global trade is highly complex, made up of an enormous number of very small, widely dispersed artisanal fisheries across many countries, trading in over 2000 species from a wide variety of habitats, through numerous small and medium sized businesses via complex supply chains. It is low impact, low volume and high value. When managed well it can provide a net biodiversity and economic gain in some of the world's poorest countries. This small scale and the diverse nature of the trade can mean that, whilst there may be questions over the sustainability of stocks in some areas, it does not necessarily mean those issues exist elsewhere for the same species. The task set by COP18 is therefore a huge endeavour and we must not underestimate the substantial effort that will be required from all parties involved if we are to achieve useful and beneficial outcomes.

The aim of CITES is to ensure that trade in endangered species is sustainable so for this initiative to be successful it is essential to first understand the trade, including the species and countries involved, trade routes, patterns and trends. However, from information presented to and comments made during COP18, it is clear that there is a deep lack of understanding of the marine ornamental fish trade.

As the organisations representing this trade we can enable access to current trade data that will develop the necessary understanding and ensure consideration of this issue starts from a sound, evidence-based footing. A good understanding of the trade and the species in trade will also provide a sound basis from which to prioritise future deliberations. It will also provide a basis from which to help focus attention on potentially problematic areas. Ultimately, it will ensure a sound baseline from which to identify the measures that can help secure a sustainable trade, be they

fisheries management measures, CITES-listings, certification schemes or something else. On this basis we support the draft workflow outlined in Figure 1.

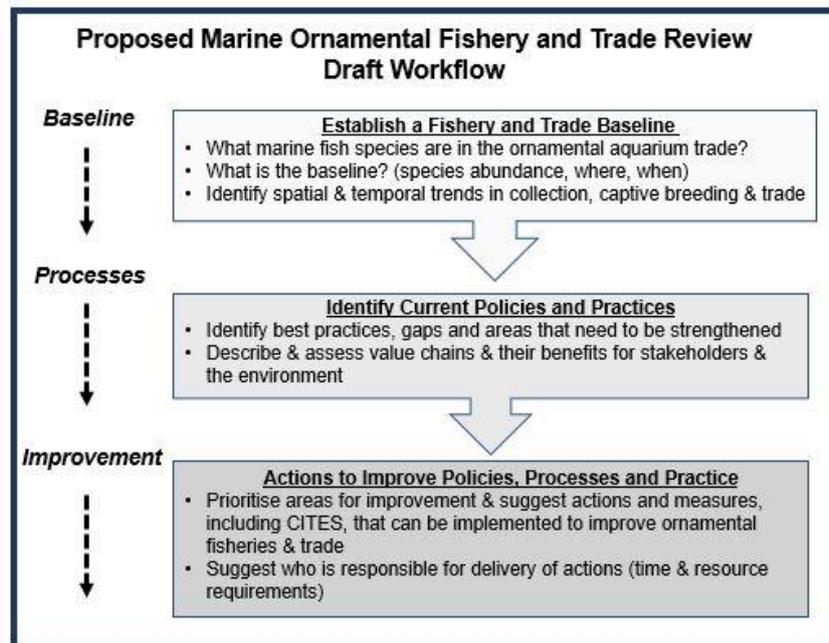


Figure 1

We do not believe that rapidly prepared background studies, as has been proposed, will be able to demonstrate an accurate picture of the global trade. Official data does not contain sufficient depth to identify species in trade and is often inaccurate. For example, it suggests that Spain is a major exporter of marine ornamental species when in fact there is little to no trade from there - possibly a case of incorrectly recording marine food fish as marine ornamental fish. This data cannot therefore be relied on to provide a good baseline to describe the global trade.

Data from academic/scientific reports is, on the whole, out of date (by 15-20 years) and does not accurately reflect current trade patterns. The results from these studies are often based on incorrect assumptions about the trade and unsound data extrapolations, ultimately resulting in outcomes that do not reflect the real-world trade (which changes according to changing demand) and in misleading or inappropriate conclusions.

We do not, therefore, believe that the approach proposed at Figure 2 below can deliver the baseline data required for this initiative and do not believe we could secure industry support for it, especially if the intention is to identify NGOs to produce the background studies.

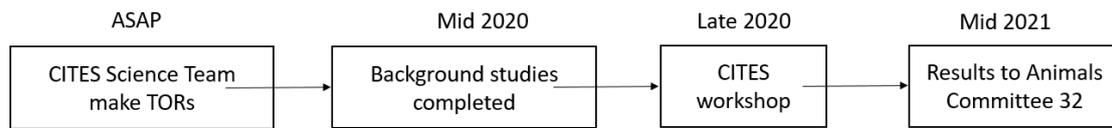


Figure 2

Further, we cannot support any approach that prioritises administrative expediency over good baseline data and a constructive approach to decision-making. We do not therefore support it.

We should all have the aim of long-term beneficial solutions that support conservation, sustainability and the livelihoods of the fishing communities involved in this trade in the many under-developed parts of the world where they exist. Anything other than an approach underpinned by a comprehensive assessment of the current trade presents a very significant risk that consequent decisions result in more harm than good, potentially resulting in negative social and conservation outcomes or longer-term institutional and environmental harm if the fishermen are less likely to cooperate and/or are affected such that they revert to less sustainable or alternative livelihoods as a result of poorly considered trust and agreement building and/or trade management measures.

We are keen to identify outcomes that can secure a long-term sustainable trade and, as we have stated both at the COP and since, we are eager to work in partnership with key intergovernmental organisations, such as FAO, WCMC and IUCN to ensure this. We therefore offer our support and cooperation and the input of our member businesses to work with these organisations and CITES in defining a trade data collection method that can engage, and be supported by the global industry and ensure the delivery of sound baseline data for future decisions.

Under the Memorandum of Understanding between CITES and FAO, CITES acknowledges FAO's expertise on matters relating to commercially-exploited aquatic species. As the global authority in respect of fisheries management issues, we believe that FAO are best placed to lead the management and oversight of this process and would encourage their role in this regard to be supported by others.

We welcome the continued opportunity to input into ongoing discussions with the aim of identifying a way forward that will deliver constructive, practical and sustainable outcomes for all.

Yours sincerely,

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