

ADDENDUM 1**SCIENTIFIC COUNCIL COMMENTS**

(arising from ScC-SC8)

**PROPOSAL FOR A CONCERTED ACTION FOR
THE BASKING SHARK (*Cetorhinus maximus*) ALREADY LISTED ON
APPENDICES I and II OF THE CONVENTION**

UNEP/CMS/COP15/Doc.31.3.14

RECOMMENDATIONS TO COP15

The Scientific Council recommends to adopt the proposal.

GENERAL COMMENTS ON THE DOCUMENT

The Sessional Committee commented that the actions included in the Concerted Actions are rather broad, noting that for the brief period of a Concerted Action, prioritization of certain actions may be necessary.

The COP-appointed Councillor for Marine Fish suggests prioritizing the quantification and mitigation of bycatch and vessel strikes (Activity 4 and 5) along with identifying critical habitats and migration routes, standardizing sightings, bycatch, and strike data, as well as developing a global PAC/key habitat database (Activity 6 and 8).

In the proposal it is repeatedly recognized that basking shark data is primarily found within the North Atlantic, while data within the Southern Hemisphere is quite limited. Importantly, data from the Pacific is nonexistent despite the devastation of Pacific basking shark populations. In the face of these data gaps, many responsibilities and existing funding listed in the activities table are still focused on Ireland and the North Atlantic. The Sessional Committee requests clarification on the scope of the Concerted Action, whether it is global or regional in nature, and how under-studied regions will be incorporated.

The Sessional Committee requested further clarification on how the implementation of the Concerted Action will feed existing processes and avoid setting up parallel structures.

Activity 3 proposes “unified international guidelines” for basking shark tourism, based mainly on guidelines incorporated by countries with established basking shark tourism, such as Ireland and the UK. The Sessional Committee requested that the source of the guidelines should be inspected, to determine whether the existing guidelines are government-regulated or decided by tourist companies. To properly adhere to the goals of the Appendices, the adopted guidelines must be globally adaptable and aligned with existing CMS guidance on marine wildlife watching ([UNEP/CMS/COP14/Doc.27.3.1/Annex 2](#) ; within which basking sharks are mentioned).

Regarding Activity 8, which references a global database, the Sessional Committee highlighted the need for a primary host to maintain shared databases long-term and a governance plan for the data contribution of CMS Parties. Additionally, it noted that this potential collaboration between Parties must address the broader “basking shark network” mentioned in the Concerted Action activities table.

The Sessional Committee noted that several proposed activities extend beyond the triennium or are open-ended, and emphasized that the Concerted Action would require evaluation by the COP every triennium. The Committee also expressed concern about the lack of prior consultation with Range States and reiterated that Concerted Actions should not direct actions to Parties without following appropriate consultation and procedural processes.