Royal Zoological Society
of New South Wales

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To: Director, Department of Agriculture, Water and the Environment, Wildlife Trade Assessments Section

Re: Commonwealth Coral Sea Fishery – Sea Cucumber Fishery

From: Dr Pat Hutchings, President of Royal Zoological Society of NSW

3rd December 2020

Dear Director,

The Royal Zoological Society of New South Wales (RZS NSW) is Australia's oldest and largest zoological society, including professional zoologists and ecologists and members of the broader community passionate about the conservation of Australasia's unique animals.

We have read in detail the submission for a further export approval for the Coral Sea Fishery under the *Environment Protection and Biodiversity Conservation Act 1999*. We are restricting our comments to the sea cucumber fishery, where the RZS NSW Council has expertise and not to the fish component.

The current Wildlife Trade Operation (WTO) has approval until 18th December 2020 for the sea cucumber fishery. The two species involved in this fishery are *Holothuria whitmaei* (BTF – black teatfish) and *H. fuscogilva* (WTF – white teatfish) are now listed in Appendix II CITES (FAO 2019). This listing will result in the restriction of the trade of these two species which while not easy to distinguish in the field are easily separated when dried which is how these species are marketed and will facilitate their monitoring. In order for these species to be harvested, the fishery must be reassessed by WTO.

The RZS NSW strongly recommend that the Appendix II CITES listing of these two species be respected here in Australian waters by being given full protection and a cessation of export.

The Society is aware that populations of both black and white teatfish are in serious trouble. Their biology and ecological traits make them vulnerable to local extinctions through overfishing and with little or no recovery decades after harvest (Uthicke et al., 2004). This led to them being listed in 2013 by the International Union for the Conservation of Nature (IUCN) on the Red List of Threatened Species one as Endangered (black teatfish) and the other as Vulnerable (white teatfish) as it was shown that they had declined by 60-80% across at least 30% of their range (Conand et al., 2013a,b, 2014). Since 2013 the situation has continued to deteriorate.

We are concerned that the sea cucumber fishery is managed as if consists of a single species, whereas several are involved, all with having specific habitat requirements – this approach will almost certainly continue to impact on the density of all these holothurians, including the threat-listed species. All these animals play a key role in the ecosystem health, extensively recycling sediment and nutrients that is critical for sediment habitats across the Coral Sea. While the perception of coral reefs is that they are made up of only coral, in fact the dominant habitat is actually inter-reefal soft sediment habitats.

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The RZS NSW strongly recommends that the Wildlife Trade Assessments uphold the listing of *Holothuria whitmaei* and *H. fuscogilva* through full protection of these species in Australia. *Thelenota ananas* should also be considered to be removed from the fishery.

If you have any questions, please contact us.

Yours faithfully

Dr Pat Hutchings

President of Royal Zoological Society of NSW

Conand, C. et al. 2013a. *Holothuria whitmaei*. *The IUCN Red List of Threatened Species* 2013: e.T180440A1630988. https://dx.doi.org/10.2305/IUCN.UK.2013-1.RLTS.T180440A1630988.en.

Conand, C. et al. 2013b. *Holothuria fuscogilva*. *The IUCN Red List of Threatened Species* 2013: e.T200715A2681354. https://dx.doi.org/10.2305/IUCN.UK.2013-1.RLTS.T200715A2681354.en.

Conand, C. et al. 2014. The IUCN Red List assessment of aspidochirotid sea cucumbers and its implications. *SPC Beche-de-mer Information Bulletin*, *34*: 3-7.

FAO. 2019. FAO expert advisory panel assessment report: COP18 proposal 45. In: *Report of the Sixth FAO Expert Advisory Panel for the Assessment of Proposals to Amend Appendices I and II of CITES. Concerning Commercially Exploited Aquatic Species*, Rome, 21–25 January 2019. FAO Fisheries and Aquaculture Report No. 1255. Rome. 62-105.

Uthicke, S. et al. 2004. Slow growth and lack of recovery in overfished holothurians on the Great Barrier Reef: evidence from DNA fingerprints and repeated large-scale surveys. *Conservation Biology*, 18: 1395-1404.