



CCAMLR

COMM CIRC 12/60
SC CIRC 12/34

среда, 9 мая 2012

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Dear Aleksandra

Response to Comm Circ 12/34 and CCAMLR XXX/38

We welcome the dialogue that EU has initiated in CCAMLR on capacity management and thank you for the opportunity to further consider this issue in the intersessional period. We continue to believe that capacity management is an issue that does need to be considered by CCAMLR in a holistic and a stepwise manner.

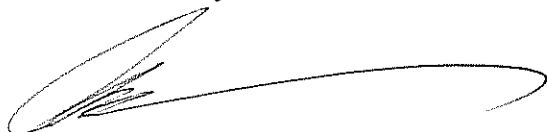
We do not believe that there has been sufficient discussion by CCAMLR on criteria it should consider if it were to develop an allocation scheme. We are of the view that there is a broad range of issues that need to be considered, in depth, before CCAMLR is able to make decisions on future allocation, noting that many factors contribute to choices made by Members on how they wish to participate in rational use of Antarctic marine living resources, not just the history of fishing.

We believe that CCAMLR needs to give consideration to how it would develop a formula that incorporates all the relevant criteria in order that all contributions to CCAMLR are taken into account in a fair manner. We recognise that this process will be complex and that CCAMLR will need to develop a process for quantifying the criteria before they are able to be applied to achieve capacity limiting outcomes.

We note that the EU proposal considers improved compliance and safety would be a result following the establishment of a capacity management system. We also note the sentiment in the EU proposal that capacity management as proposed would be independent to current work on compliance and scientific contribution. We consider compliance and scientific contributions (contribution to management) are very important criteria in establishing a capacity management framework. In regard to compliance, we feel that DoCEP would have a significant role to play and should be progressed further prior to establishment of a capacity management scheme.

Thank you again for the opportunity to provide input. We look forward to continuing to engage with the EU on further progressing capacity management discussions in CCAMLR.

Yours sincerely

A handwritten signature in black ink, consisting of a large, sweeping loop followed by a series of smaller, more intricate strokes.

Tony Fleming
Australian Representative to CCAMLR

7 May 2012