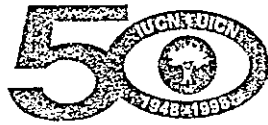


RPT
IUCN → 3828

Country Office



IUCN
The World Conservation Union

1, Bath Island Road,

Karachi 75530

Pakistan

Tel: ++92 21-5861540/41/42

Fax: ++92 21-5870287

Mr. M A. Wajid Jawad
Chairman
Export Promotion Bureau
Government of Pakistan
Block 'A', 5th Floor,
Finance & Trade Centre
Sharaf Faisal
KARACHI

February 6, 1999

Dear Mr. Jawad,

When we met at the SMEDA board meeting in Lahore recently we spoke of the issue of turtles being caught in shrimp nets and, as a result of not fitting our nets with the Turtle Excluder Dence (TED) the fact that Pakistan's export of shrimps was banned from import into the US.

When this had first occurred, we had advised the government of various measures they could take, including the support to a SME, to develop such devices for fitting on the trawlers

Since then, Pakistan has taken the case to WTO and I understand that while WTO has ruled in our favour, it is still being contested in the US

As a biologist with experience of the life cycles of marine turtles and the effect of shrimp trawling on their mortality along our coasts, it is highly likely that the controversy will continue with the US, and as environmental regulations get more stringent the world over, we will find ourselves faced with the demand to fit on TED's from other countries also (e.g. the EU).

I therefore suggest that as part of the fisheries sector policy currently being considered the issue of the TED's be looked into in more detail, as an opportunity presents itself here to be proactive in the conservation of an endangered species, secure our export markets, and encourage the development of an SME

Technical information on TED's and the scientific basis for the US ban on imports are available from the IUCN library in Karachi or from our office in the US

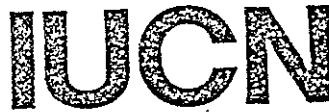
I enclose the letters, written to the Ministry of Environment and Commerce in 1996/97.

With best wishes

Yours sincerely,


ABAN MARKER KABRAJI
Pakistan Country Representative

Cc: Kh. Belal Ahmed, Chairman & CEO, SMEDA
~~Tahir Qureshi~~ Nargis Alavi IUCN Karachi



The World Conservation Union

Mr. Shamim Ahmad Khan
Secretary to the Government
Ministry of Commerce
Government of Pakistan
ISLAMABAD

January 28, 1997

Dear Shamim Ahmad saheb,

Thank you so much for meeting with me the other day, and assisting with our case on the import of vehicles for the Balochistan Conservation Strategy.

Enclosed, as per your request, the note on the turtles, and our suggestions of how the government might proceed. More recent evidence from one of our biodiversity survey teams working in the Hingol area in Balochistan indicates that the trawlers come in close to the turtle nesting grounds and that there is regular occurrence of incidental catch. Dead olive ridleys (drowned in the nets) were seen being thrown out of the trawl and washed up onto the beach. It is clear we cannot continue to deny there is a problem, and some measure of regulation and mitigatory devices such as the TEDS will be necessary if the ban is to be lifted.

Please let us know if we can be of further assistance in giving advice along the lines we suggest in our paper, or in negotiations with the US government on the best way forward, through the assistance of our US office.

With best wishes,

Yours sincerely,

ABAN MARKER KABRAJI
Pakistan Country Representative

cc: Mr. Zafarullah Khan
Richard Garstang/Daved Ahmed
Scott Hajost
A.L. Rao/Manik Wijeyeratne/Scott Perkin

Country Office

1 Bath Island Road

Karachi-75530

Pakistan

Tel ++ 92 21-5861540/

5861541-5861542

Fax ++ 92 21-5870287

Telex 34154 MARK PK

IUCN

The World Conservation Union

Mr. Rana Rafiq Ahmed
Dy Inspector General Forests
Ministry of Environment Urban Affairs
Forestry and Wildlife
Islamabad

6 June 1996

Dear Mr. Ahmed,

Thank you for your letter of 26 May (addressed to Mr. A.L. Rao of our Islamabad Office) requesting assistance with the preparation of a position paper on shrimp fishing and the incidental catch of marine turtles.

This is an important issue, with implications for Pakistan's economy and international image, as well as the conservation and sustainable utilisation of our coastal resources. Pakistan has globally significant populations of two species of threatened marine turtles (the Green Turtle, *Chelonia mydas*, and the Olive Ridley Turtle, *Lepidochelys olivacea*), and there are sporadic reports of the presence of a further three species; we also have a sizeable fleet of mechanical shrimp trawlers within our waters, none of which are likely to be using Turtle Excluder Devices (TEDs). In the absence of any reliable or systematic research on the issue, it is fair to assume that the impact of shrimp harvesting activities on marine turtles is likely to be high.

As a result of these conditions, Pakistan would not be eligible for certification by the US Department of State under Section 609(b)(2)(C), and will need to develop an effective regulatory programme if it is to be permitted to resume exports to the United States. We would propose that the following steps be taken in developing such a programme:

- the implementation of a detailed survey by the Fisheries Department, the Sindh Wildlife Department, and other concerned organisations, aimed at assessing the number of commercial shrimp trawlers operating in Pakistan's waters, and the scale of the incidental take of marine turtles. It would be important for this survey to be carried out in a scientifically rigorous and objective fashion, so that it will be accepted as a credible baseline. This would require specialist assistance with the design of the survey and the collection and analysis of data; it would also entail taking measures to ensure that data are not tampered with or altered, and carrying out the survey over the course of at least one full fishing season (and possibly longer). It might be possible to request technical inputs from the United States (through their Embassy in Islamabad), who could perhaps second a fisheries biologist/marine turtle specialist to Pakistan to assist with the design and organisation of the survey, the training of staff, etc.;
- the development of a regulatory framework, requiring all commercial shrimp trawlers operating in Pakistan's waters to use Turtle Excluder Devices. This could perhaps be achieved by negotiating voluntary compliance; however, in the event that new legislation is required, we would recommend that this be developed through a consultative process involving all the major stakeholders, including the shrimp industry, Government, NGOs, academia and others;

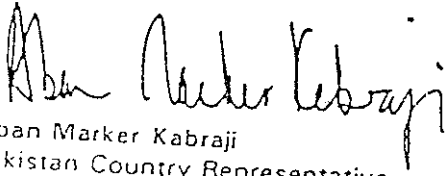
- the development of programmes to introduce TEDs. This could involve a number of different steps, including: the identification of international TED manufacturers; an assessment of the costs and benefits of different models; an assessment of the feasibility of importing TEDs in the numbers required or of manufacturing TEDs within Pakistan; a review of the desirability of establishing a soft loan or grant scheme to assist trawlers to adopt this new technology; and the development of a training scheme explaining the way in which TEDs are fitted and used;
- the initiation of an education and awareness programme. To complement these steps, we would also suggest that an education and awareness programme be started, targetted in the first instance at the shrimp trawling community. The programme could be designed to explain the international significance of Pakistan's marine turtle populations, the implications of the US embargo, and the steps being taken by GOP to ensure continued exports. New legislation could be publicised (if it is promulgated) and the penalties for non-compliance described. The benefits of using TEDs could also be highlighted; for example, under certain conditions, the use of TEDs can increase shrimp yields. The programme could also be designed to provide practical advice on accessing soft loans for TEDs, the availability of training programmes, etc;
- the development of a monitoring and enforcement programme. This would entail the design of a monitoring strategy, the identification of lead responsibilities, and the provision of further training and equipment to the Fisheries Department and the Sindh Wildlife Department;
- increased turtle protection measures. The guidelines issued by the US Department of State indicate that the certification process will also take into consideration additional measures to protect marine turtles at all stages of their life cycle. In this regard, we would strongly recommend that GoP (through the relevant wildlife departments in Sindh and Balochistan) strengthen its turtle conservation programmes, by protecting nesting beaches, expanding turtle hatcheries, increasing research efforts, and improving the enforcement of the existing prohibitions on direct take.

As indicated by this framework action plan, the successful introduction of TEDs will be a significant undertaking, requiring commitment and investments from a variety of stakeholders, particularly GoP. If requested by the Ministry, IUCN would be very pleased to assist with the development of an integrated turtle conservation programme (so long as our expansion can be met). For example, through its international Marine Turtle Specialist Group and its Karachi based Coastal Ecosystem Unit, IUCN could provide technical assistance with the design and implementation of the baseline survey. IUCN also has considerable experience of drafting new environmental legislation, organising consultative processes, and the development of communications and education programmes. It is possible that Pakistan's national community might be interested in providing funding for an integrated programme of this nature.

The incidental take of endangered and threatened species (such as marine turtles and dolphins) by commercial fisheries is becoming an increasingly emotive issue for environmental lobbyists in both the US and Europe. It is critical that Pakistan accord importance to this issue, and develop a scientific and credible response. Although the investments required may be sizeable, it is IUCN's view that they will be amply and quickly repaid through the economic benefits of continued shrimp exports, the maintenance of Pakistan's international image, and the conservation of our biological heritage.

I hope that these ideas will be of use; please let me know if IUCN can be of any further assistance to GoP in helping to resolve this important issue.

Yours sincerely,



Aban Marker Kabraji
Pakistan Country Representative

- cc: Mr. Abu Shamim Ariff, Vice Chairman, Export Promotion Bureau
Mr. M. Adil Siddiqui, Director, Export Promotion Bureau
Mr. Abrar Mirza, Director, Sindh Wildlife Department
Ms. Fehmida Asrar Ghauri, Sindh Wildlife Department
Dr. Tariq Banuri, Sustainable Development Policy Institute
Ms. Khawar Mumtaz, IUCN Regional Councillor for West Asia
IUCNP Programme Directors (TD, ALR, JA, SP, DD, SJ, SH, NRA, PN, MIR)