

**SCIENTIFIC COUNCIL COMMENTS**  
(arising from ScC-SC2)

**CONSERVATION AND MANAGEMENT OF WHALES AND THEIR HABITATS  
IN THE SOUTH ATLANTIC REGION  
UNEP/CMS/COP12/DOC.24.2.6**

**RECOMMENDATIONS TO COP12**

- Recommended for adoption

**GENERAL COMMENTS ON THE DOCUMENT**

- This initiative would potentially qualify as Concerted Action for a number of species.
- A map of the area covered by the Action Plan would be useful.
- It is important to ensure cooperation with other intergovernmental organizations (e.g. RFMOs and other fisheries organizations, IWC regarding ship strikes) in particular to cover the High Seas areas.
- How will specific actions for specific range states be identified? As it stands, the activities are fairly general.
- If not already done, a full Range State consultation with CMS Focal Points, especially for activities in national waters, should be undertaken preferably before COP.
- The ambition of the Plan is welcomed, but some of it might benefit from being implemented in a stepwise manner.

**COMMENTS ON SPECIFIC SECTIONS/ INCLUDING POSSIBLE PROPOSALS FOR TEXT REVISION**

Page 15, para. A6

- Add activity on working with IWC on ship strikes

Page 17, para. A8

- Modify Action a) to promote the use and linking of existing databases, create only when necessary