Regular Process for Global Reporting and Assessment of the State of the Marine Environment, including Socioeconomic Aspects

Second world ocean assessment (WOA II) – review by States

Instructions

NOTE: Only comments submitted in accordance with the six instructions below will be accepted and transmitted to the writing teams for consideration.

1. Each Member State may submit **one** set of written comments.
2. Comments must be submitted using the template provided in this document.
3. The document containing the comments must be saved in either **.doc** or **.docx** format
4. All comments must be in **English**.
5. Comments must be submitted either through the Permanent Mission to the United Nations, or through designated National Focal Point for the Regular Process.
6. Comments must be submitted to the secretariat of the Regular Process by e-mail (doalos@un.org; temnova@un.org; legesseh@un.org) no later than **midnight (New York time) on 4 September 2020.**

About the process for review by States

- States may comment on any aspects of the draft, including content, structure and references. States may provide general comments or comments on specific wording, tables, figures, maps, etc. Line numbers are provided to facilitate line-by-line review, should States so desire.
- All comments received from a State will be shared with the writing teams and the Group of Experts under the name of that State without featuring any sub-divisions (offices, departments, ministries etc.) of that State.
- The comments received from States will be shared with other States along with the second draft of WOA II and the agreed responses by the Group of Experts to the comments. States will then have the opportunity to review and raise any remaining questions they may have with the Group of Experts.
- Relevant background documents are made available on the website of the Regular Process: http://un.org/regularprocess/WOA-II-review-by-states

Tips on using the template

- The template below uses a table format. This format allows for an unlimited number of comments to be added for each chapter or sub-chapter. To add more comments on a chapter or sub-chapter, simply add more rows.
- States may copy text from the draft into the table if they wish to use “track changes” in editing text.
- The template is shared in **.doc** and **.docx** format. These formats can be used with Microsoft Office products, in Google Docs and open-source office suites such as LibreOffice.

- To enable cross-departmental collaboration across departments or agencies, States may wish to consider adding the template to a shared drive or cloud storage solution, where multiple collaborators can add their comments simultaneously.

Template

The Regular Process for Global Reporting and Assessment of the State of the Marine Environment, including Socioeconomic Aspects
First draft of the second world ocean assessment (WOA II)
Comments submitted by JAPAN

Contact person:

Please fill out the below with the details of a person the secretariat can contact in case there are any questions.

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Checklist:

◯	This document contains all comments on the **second** draft of WOA II from JAPAN
◯	All comments are submitted in the template provided below.
◯	The document is submitted in either **.doc** or .**docx** format.
◯	All comments in this document are in English.
◯	This document is submitted by (1) the Permanent Mission of JAPAN to the United Nations **OR** (2) its duly designated National Focal Point for the Regular Process.
◯	This document is sent to the secretariat of the Regular Process (doalos@un.org; temnova@un.org; legesseh@un.org) no later than midnight (New York time) on **4 September 2020.**

Chapter 1: Overall summary	
Section	**Comment**
P7 4.2. Coastal ecosystems	About 6 per cent of known fish species are listed as threatened or vulnerable, including 50 per cent of sharks and other elasmobranchs. Globally, the status of marine mammals varies, with 75 per cent of species in some groups (sirenians, freshwater dolphins, polar bears and otters) threatened or vulnerable. Many large whale species are now recovering from past harvesting as a result of international bans on commercial catches and national recovery plans. Should be changed to About 6 per cent of known fish species are listed as threatened or vulnerable, including many species of sharks and other elasmobranchs. Globally, the status of marine mammals varies, with 75 per cent of species in some groups (sirenians, freshwater dolphins, polar bears and otters) threatened or vulnerable. Many large whale species are now recovering from past harvesting as a result of international prohibition of catches and national recovery plans. (Justification) Although the response of the Group of Experts says "The percentage is given by the experts…", it has to be noted there are variety of opinions in this regard. It seems inappropriate to adopt only one specific opinion without concrete scientific evidence. A neutral description should be used in order not to mislead readers. IWC has never ever adopted "bans on commercial catches" but prohibited catches of some whale species fallen in dangerous state. It has to be also noted that when so-called moratorium on commercial whaling was adopted in 1982, such prohibitions had been already in effect and therefore the so-called moratorium was just redundant.
P13 7.2. Marine capture fisheries	Estimated global landings of marine capture fisheries increased by 3 per cent to 80.6 million tonnes, valued at 127 billion United States dollars (in 2017 prices) between 2012 and 2017. About 33 per cent of world fisheries, especially at higher trophic levels, are classified as being fished at biologically unsustainable levels, with close to 60 per cent "maximally fished". The sustainability of many of the world's capture fisheries continues to be hampered by over-

	exploitation, overcapacity, ineffective management, harmful subsidies, by-catch, in particular of threatened endangered and protected species, and illegal, unreported and unregulated (IUU) fishing, with ongoing habitat degradation and loss of gear creating further pressures on the marine environment. Should be changed to Estimated global landings of marine capture fisheries increased by 3 per cent to 80.6 million tonnes, valued at 127 billion United States dollars (in 2017 prices) between 2012 and 2017. About 33 per cent of world fisheries, especially at higher trophic levels, are classified as being fished at biologically unsustainable levels, with close to 60 per cent "maximally fished" at biologically sustainable levels. The sustainability of many of the world's capture fisheries continues to be hampered by over-exploitation, overcapacity, ineffective management, harmful subsidies, by-catch, in particular of threatened endangered and protected species, and illegal, unreported and unregulated (IUU) fishing, with ongoing habitat degradation and loss of gear creating further pressures on the marine environment. (Justification) In order to avoid any misunderstandings by readers on the unfamiliar expression of "maximally fished", similar clarification to "at biologically sustainable levels" should be used in accordance with the definition by FAO.
Chapter 6B: Marine invertebrates	
Section	**Comment**
3. Description of the environmental changes (between 2010 and 2020) 3.1 Marine invertebrate biodiversity	"Sea-area between Japan and Korean Peninsula" needs to be replaced by "Sea of Japan", the only internationally established name for the sea area concerned. In fact, the United Nations (UN) recognized "Sea of Japan" as the standard geographical term in March 2004, and UN policy states that the standard geographical term be used in official UN publications. It does not make sense to refer to the labelling of a regional sea programme only here while other seas are defined by its established names. The ROK contends that the UN and the International Hydrographic Organization (IHO) have issued resolutions

	that advocate the name "East Sea" be used together with “Sea of Japan”. However, neither UNCSGN Resolution III/20 nor IHO Technical Resolution A.4.2.6 includes any specific recommendation to use "East Sea" alongside “Sea of Japan”. Further, these resolutions presume that the geographical feature concerned is under the sovereignty of two or more countries, such as in the case of a bay or strait, and does not apply to the high seas such as with the Sea of Japan. Following the ROK's assertion, if even one of the countries bordering the Atlantic or the Pacific were to raise an objection to the names of these oceans, it would lead to the use of multiple names for these oceans, which would clearly be unmanageable. The international community cannot accept such an argument. Furthermore, as stated above the UN has already officially confirmed its policy of requiring the use of Sea of Japan as the standard geographical term in all official UN publications. The IHO publication "Limits of Oceans and Seas" (S-23) also uses the name Japan Sea for the sea area concerned. This demonstrates that there is no UN or IHO resolution recommending the use of "East Sea" together with “Sea of Japan”.
Chapter 6D: Marine mammals	
Section	**Comment**
P150 Keynote points	The number of species for which a conservation status is available has increased, with eight species moving from a status of data deficiency as a result of new information. Of baleen whales, 36 per cent of species are increasing in abundance. Overall, the status of coastal dolphins, sirenians and marine otters is deteriorating, with the vacquita close to extinction. Many species lack population abundance information. Should be changed to The number of species for which a conservation status is available has increased, with eight species moving from a status of data deficiency as a result of new information. Of baleen whales, most of species are increasing or have increased in abundance. Overall, the status of coastal dolphins, sirenians and marine otters is deteriorating, with the vacquita close to extinction. Many species lack

	population abundance information. (Justification) It might be true that less than 50% of baleen whale species is "currently" increasing. But it has to be noted that other whale species such as Antarctic minke whale have increased substantially and are now not increasing any more. Under such situation, in order to avoid a misunderstanding that 64% of species is decreasing, comprehensive description adding those species that have already increased should be used.
P150 Keynote points	Fisheries bycatch continues to be a dominant conservation threat for many species. Indirect threats such as habitat alteration, including overfishing of prey, land-based pollution, anthropogenic noise, ship strikes and disturbances are becoming more prevalent, particularly in coastal zones. Should be changed to Human activities continue to be a dominant conservation threat for many species. In addition to direct threats of Fisheries bycatch, indirect threats such as habitat alteration, land-based pollution, ship strikes and disturbances are becoming more prevalent, particularly in coastal zones. (Justification) As explained by the Group of Experts, there are a number of papers in the scientific literature that identify bycatch as a significant contributor to reductions of the populations of many species in the north Atlantic and north Pacific, where developed western countries have mainly conducted fishing activities and such bycatch have not been used. However, in other areas, such as temperate, sub-tropical and tropical areas, so-called bycatch are not categorized as such but instead treated as catch and used for food. In such areas, other causes such as habitat alteration and pollution are as serious as bycatch or even more serious than bycatch. Therefore, in order to describe the both situations in balanced manner, all those contributors should be treated with the same level.
P151 1. Introduction	Intentional takes for subsistence or for commercial harvest and bycatch and entanglement in other fisheries continue to be identified as the main conservation threats for all groups of marine mammals under assessments conducted by the

	IUCN (Figure 2; IUCN, 2019). Should be changed to Bycatch and entanglement in fisheries, human activities, climate change and pollution are identified as the main conservation threats for all groups of marine mammals under assessments conducted by the IUCN (Figure 2; IUCN, 2019). (Justification) Intentional takes of marine mammals for both subsistence or for commercial harvest have been strictly managed under the relevant international organizations or in accordance with the management procedure adopted by those organizations. Therefore, they cannot be regarded as threat. On the other hand, comparing to the past, negative effects by climate change, pollution and other human activities have increased seriousness and are expected to increase furthermore under IUCN's assessment. The above two aspects have to be reflected in the description.
P152 2.1.2. Abundance and main threats	Main ongoing threats for baleen whales identified by IUCN Red List assessments include entanglement in fishing gear (fin, gray, humpback and North Atlantic right whales), harvesting (common (B. acutorostrata) and Antarctic minke whales and sei whales) and ship strike (blue, fin, gray, humpback and northern and southern right whales) (IUCN, 2019). Should be changed to Main ongoing threats for baleen whales include human activities including entanglement in fishing gear (fin, gray, humpback and North Atlantic right whales), and ship strike (blue, fin, gray, humpback and northern and southern right whales). (Justification)

	Harvests of common and Antarctic minke whales as well as sei whales are (were) done based on scientific advices by the IWC Scientific committee and therefore cannot be considered as "threat" which is considered as a partial description lacking neutrality. It seems more appropriate to use scientific information and/or advices of the IWC Scientific Committee than those of IUCN.
Page158 Line4-6	Some elements below do not seem to be relevant to this part yet. In that sense, Japan kindly suggests that following modification be made in order to make the descriptions more accurate to avoid any misunderstanding: "~~Commercial catches~~ Catches in the western north Pacific have remained broadly stable since WOA I (IWC, 2019~~, catches taken under Special Permit~~) and catches in Antarctic waters ~~were suspended in~~have been ceased since 2019 (IWC, 2019)."
Chapter 6E: Marine reptiles	
Section	**Comment**
P169 4. Threats	Globally, threats to marine reptiles remain much the same as those identified in WOA I. Mortality from bycatch in fisheries (both regulated and illegal, unreported and unregulated) remains the most significant threat to marine turtle and sea snakes (Lewison and others, 2014; Rees and others, 2016; Riskas and others, 2018). Should be changed to Globally, threats to marine reptiles remain much the same as those identified in WOA I. Mortality from bycatch in fisheries (both regulated and illegal, unreported and unregulated) remains the significant threat to marine turtle and sea snakes (Lewison and others, 2014; Rees and others, 2016; Riskas and others, 2018). (Justification) As there seems no comprehensive analysis on the causal relationship among the possible threats, the moderate description should be used.

Chapter 6F: Seabirds	
Section	**Comment**
P179 Keynote points	Pressures related to fishing (by-catch and prey depletion) are now affecting more species, while pollution is affecting fewer species (although marine debris, especially plastics, is an emerging threat with poorly understood consequences). Should be changed to In addition to pressures related to fishing (by-catch and possible prey depletion), pollution is affecting species(marine debris, especially plastics, is an emerging threat with poorly understood consequences). (Justification) I do not believe that comparison of only the two papers can provide us with the real state and that there is a comprehensive statistical analysis on the gravity of the negative effects, and therefore such baseless comparison should be avoided.
P184 4. Outlook	In this context, the transition of fisheries to lower trophic levels, especially those targeting mesopelagic species (St. John and others, 2016), may be particularly problematic because mesopelagic fishes are an important part of the diet of many pelagic seabirds (Watanuki and Thiebot, 2018). Should be changed to In this context, the transition of fisheries to lower trophic levels, including those targeting mesopelagic species (St. John and others, 2016), may be problematic because mesopelagic fishes are an important part of the diet of many pelagic seabirds (Watanuki and Thiebot, 2018). (Justification) Even if the text is a part of the Outlook section, it could be used as an independent description by some. Therefore,

	description should be neutral and eliminate exaggerated expressions which could easily mislead readers.
Chapter 7F: Cold-water corals	
Section	**Comment**
P268 1. Introduction and summary of the First World Ocean Assessment (WOA I)	Cold-water coral ecosystems provide essential services for human communities and well-being (see also Section 3). Demonstrated services include the discovery of novel marine genetic resources (Chapter 26 of the present Assessment), carbon sequestration, and significant aesthetic value (see Thurber and others, 2014, for a review). Should be changed to Cold-water coral ecosystems provide well-being for human communities (see also Section 3). Demonstrated well-beings include the discovery of novel marine genetic resources (Chapter 26 of the present Assessment), carbon sequestration, and significant aesthetic value (see Thurber and others, 2014, for a review). (Justification) Although cold-water coral ecosystem might be able to provide some essential services for human communities, other ecosystems have provided such "essential" services more than CWC ecosystem. Therefore, the description should be moderate excluding such exaggerated expression.
Chapter 7M: High-latitude ice	
Section	**Comment**
P.353	There should be a word of "United" as follows, ～ several United Nations Sustainable Development Goals (SDGs)～.
Chapter 7Q: Ridges, plateaus and trenches	
Section	**Comment**
2. Description of the environmental changes (between 2010 and 2020)	"and its marginal seas" needs to be replaced by "the Sea of Japan and the Sea of Okhotsk", the only internationally established name for the sea area concerned. In fact, the United Nations (UN) recognized "Sea of Japan" as the

2.1.4. Hadal trenches	standard geographical term in March 2004, and UN policy states that the standard geographical term be used in official UN publications. It does not make sense to refer to the labelling of a regional sea programme only here while other seas are defined by its established names. The ROK contends that the UN and the International Hydrographic Organization (IHO) have issued resolutions that advocate the name "East Sea" be used together with “Sea of Japan”. However, neither UNCSGN Resolution III/20 nor IHO Technical Resolution A.4.2.6 includes any specific recommendation to use "East Sea" alongside “Sea of Japan”. Further, these resolutions presume that the geographical feature concerned is under the sovereignty of two or more countries, such as in the case of a bay or strait, and does not apply to the high seas such as with the Sea of Japan. Following the ROK's assertion, if even one of the countries bordering the Atlantic or the Pacific were to raise an objection to the names of these oceans, it would lead to the use of multiple names for these oceans, which would clearly be unmanageable. The international community cannot accept such an argument. Furthermore, as stated above the UN has already officially confirmed its policy of requiring the use of Sea of Japan as the standard geographical term in all official UN publications. The IHO publication "Limits of Oceans and Seas" (S-23) also uses the name Japan Sea for the sea area concerned. This demonstrates that there is no UN or IHO resolution recommending the use of "East Sea" together with “Sea of Japan”.
Chapter 8C: Maritime industries (incorporates elements from Chapters 8A, 18, 23, 24)	
Section	**Comment**
7.1. Situation as shown in the First World Ocean Assessment (WOA I)	P479 Line “especial” should be “especially”
Chapter 11: Liquid and atmospheric inputs from land, ships and offshore installations	
Section	**Comment**
5. Radioactive Substances 5.2 Situation recorded in the First World Ocean Assessment (WOA I)	For the purposes of accuracy, the sentence “The nuclear accidents at Chernobyl and Fukushima resulted in large inputs of radioactive material to the ocean but were of limited concern by 2014; the input at Fukushima was limited

Page 559	to immediately after the accident." should be replaced by "The nuclear accidents at Chernobyl and Fukushima resulted in large inputs of radioactive material to the ocean, while increments of the input at Fukushima was limited immediately after the accident."
5. Radioactive Substances 5.3. Description of the environmental changes (between 2010 and 2020) "Nuclear Incidents" Page 563	For the sentence "There have been no significant major nuclear incidents2011.", "since" should be added before "2011".
5.Radioactive Substances 5.3.Description of the environmental changes (between 2010 and 2020)	Page 560, Lines 21-23 Japan had requested to delete "new" because it is not appropriate for the Rokkasho Reprocessing Plant (RRP) and the Group of Experts approved the deletion. However, "new" remains in the second draft, so Japan requests to delete the "new" again. In addition, the official name of the reprocessing plant should be used for this sentence, so we request to change the sentence "a nuclear reprocessing plant" to "the Rokkasho Reprocessing Plant". Since the word "now" seems to be unnecessary in this sentence, we also request you to delete the word. In addition, JNFL officially rescheduled the completion of RRP to the first half of fiscal year 2022, on 21 August, so we also request to modify the description from "by October 2021" to "by October 2022". Therefore, we would suggest that the description is modified as follows. In Japan, ~~a new nuclear reprocessing plant at Rokkasho~~ the Rokkasho Reprocessing Plant is ~~now~~ expected to come into operation by October 2022~~1~~ (JNFL, 2020).
Chapter 12: Solid waste	
Section	**Comment**
2. Dumping at sea (including garbage from ships and sewage sludge) 2.1 Introduction	Please add "(i)" on the sentence below: "Dumping is any deliberate disposal of wastes or other matter from vessels, aircraft, platforms or other man-made structures at sea, according to Article 1, para. 5 (a) (i), of the United Nations Convention on the Law of the Sea (UNCLOS),.."

(Page.609)	
Chapter 19: Seabed mining	
Section	**Comment**
4.Economic and social impacts 4.1.1.Economics of deep seabed mining for polymetallic nodules (Page.698)	Both the payment of administrative expenses and compensation to those states affected from DSM are obligations of UNCLOS and the 1994 Agreement. Therefore, in light of the technical reason, the text should be amended as follows: "While the potential revenue from the sales of metals is sufficient financially to justify the rather large investments and operating costs associated with DSM, the funds must first cover all administrative expenses at the ISA~~.~~, ~~The revenue must also meet the obligations under part 11 of UNCLOS. D~~d~~eveloping countries may also need to be compensated if impacts from DSM on metals prices affect those countries, in accordance with UNCLOS and the Agreement relating to the implementation of Part XI of the UNCLOS 1982."
4.Economic and social impacts 4.1.1.Economics of deep seabed mining for polymetallic nodules (Page.698)	Whether the received fund is substantial or not is a matter of subjective judgement, and objective expression is preferred. Therefore the text should be amended as follows: "Initial investigations of the economics of the system show promise that all stakeholders can receive a certain ~~substantial~~ funds."
4.Economic and social impacts 4.2. Social impacts (Page.700)	Modality of compensation to those affected from deep sea mining should be discussed at ISA in accordance with Section 7, paragraph 1, Annex of the Agreement relating to the implementation of Part XI of the UNCLOS 1982 (Please refer to Section 7, paragraph 2 of the Agreement which defines Article 151, paragraph 10, of the Convention shall be implemented by means of measure of economic assistance referred to in paragraph 1.) This report should not prejudice to such discussion and decision-making at ISA. Therefore, the text should be amended as follows: "It should be recognized that, while a new source of metal supply might be beneficial, there could be negative consequences, such as for countries whose economy relies heavily on the export of metals obtained from terrestrial mining, and, in accordance with Section 7, paragraph 1, Annex of the Agreement relating to the implementation of

	Part XI of the UNCLOS 1982 (Please refer to Section 7, paragraph 2 of the Agreement~~ Article 151, paragraph 10, of the United Nations Convention on the Law of the Sea~~, those consequences need to be studied and addressed~~, for example via monetary compensation~~.”
Chapter 21: Anthropogenic noise	
Section	**Comment**
2.Description of the environmental status	“is often the main anthropogenic contributor”should be replaced with “could be the main anthropojenic” Rationale: We find no evidence justifying such conclusion. As emphasized at UN-ICP in 2018, there still exist a number of knowledge gaps to identify what the main contributor is.
2.Description of the environmental status	“evidence” should be replaced with “a study”. Rationale: Although a paper is referred, we see no justification to conclude it as “evidence”.
2. Description of the environmental status	“However, shipping itself causes mortality in marine mammals through ship strike (Cates and others, 2017; see also Chapter 6D).” should be deleted. Rationale: This is not an issue related to anthropogenic underwater noise to be addressed here.
2. Description of the environmental status	“; Tsujii and others, 2018” should be deleted. Rationale: The report by Tsujii et al. does not provide evidence for shipping noise being the cause of changes in mating behaviour of humpback whales, nor provide any finding on “potential consequences on the survival of populations and communities “ of humpback whale as clarified by the authors (see the URL below). http://www.naoe.eng.osaka-u.ac.jp/ssri/ecosystem/img/2018-Oct24_ResPaper.pdf If “; Tsujii and others, 2018” is to be retained, “with potential consequences on the survival of populations and communities across a number of marine taxa.” should be delated.

3. Description of the economic and social consequences and/or the other economic or social changes	“may be most directly” should be replaced with “may be directly”. Rationale: The term “most” seems ambiguous”
5. Outlook	“To achieve these goals, one step may be to reduce noise from shipping, the major anthropogenic noise contributor at low frequencies in the open ocean” should be delated. Rationale: We do not see justifications to conclude that shipping be the major contributor to anthropogenic underwater noise as described here.Although a study (Wenz, 1962) is referred here, noting that shipping activities involving technologies and operational patterns have been continuously changing, we cannot make any conclusion based only on such a study.
Chapter 25: Invasive species	
Section	**Comment**
4.5. North Pacific Ocean	On page 772, "4.5. North Pacific Ocean", The wording in the end of the text as "the Tohoku earthquake". However, the official name of this earthquake is "the Great East Japan Earthquake". Therefore, this should be corrected. A similar wording was also found on page 803.
Chapter 26: Marine genetic resources	
Section	**Comment**
3. Economic and social consequences and/or changes	It is written that the CBD commissioned studies covering the concept and scope of digital sequence information, traceability and databases, and domestic measures, which are now published following an open review period. However, the cited literature of Houssen and others (2020) in the section seems to be a document made in advance of the review period. Besides, this document is focusing on just the concept and scope, but not traceability and databases, and domestic measures. Thus, the cited literature should be corrected.
Chapter 27: Marine hydrates	
Section	**Comment**
(reference part)	One of the reference sources named “Gas Hydrates in the

	Ulleung Basin, East Sea of Korea" needs to be removed, because the part of the title "East Sea" is inappropriate for international official document. "Sea of Japan" is the only internationally established name for the sea area concerned. In fact, the United Nations (UN) recognized "Sea of Japan" as the standard geographical term in March 2004, and UN policy states that the standard geographical term be used in official UN publications. It does not make sense to refer to the labelling of a regional sea programme only here while other seas are defined by its established names.
Chapter 30: Management approaches (incorporates elements from Chapter 8D)	
Section	**Comment**
2. Management approaches 2.1 Introduction to the ecosystem approach (Page.855)	Paragraph 135 of the Advisory opinion of the ITLOS (2011) stated; "In the view of Chamber, this has initiated a trend towards making this 【precautionary】 approach part of customary international law." This does not mean "the precautionary approach is considered as part of customary international law" as you wrote. In our understanding, there are still various views on this. This part should be modified or deleted as follows. "The precautionary approach, as reflected in Principle 15 of the 1992 Rio Declaration on Environment and Development, which states that, where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation, has been incorporated into an increasing number of international treaties and other instruments ~~and is now considered as part of customary international law~~ (see, for example, Advisory Opinion of the Seabed Disputes Chamber of the International Tribunal of the Law of the Sea, ITLOS (2011), para. ~~125~~ 135). *Please confirm the number of the paragraph of the case. It may be wrong (para. 125 should be para.135).
P861 3.2. Area-based management tools	Marine protected areas may also be used in combination with fisheries management tools and sanctuaries (no take zones which may be within MPAs). Sanctuary areas and seasonal and year-round fisheries closures and exclusion zones provide area-based management mechanisms that seek to

	improve species population and biodiversity recovery. For example, the International Whaling Commission has established two sanctuaries, both of which prohibit commercial whaling: the Indian Ocean Sanctuary which was established in 1979 and covers the whole of the Indian Ocean south to 55°S; and the Southern Ocean Sanctuary which was established in 1994 and covers the waters around Antarctica. Should be changed to Marine protected areas may also be used in combination with fisheries management tools and sanctuaries (no take zones which may be within MPAs). Well defined sanctuary areas and seasonal and year-round fisheries closures and exclusion zones can provide area-based management mechanisms that seek to improve species population and biodiversity recovery. (Justification) If the intent of the Group of Experts is to provide examples of management approaches that "seek to improve species population and biodiversity recovery", examples which brought no such improvement cannot be cited. The two sanctuaries adopted by the IWC without scientific justifications are the very examples of those that cannot be cited. As explained in our previous comment, the Southern Ocean Sanctuary was recognized by outside reviewers that it does not contribute to whale resources management.
8. Outlook	P874 Line 251 Replace "the Samoa Pathway" by "the SAMOA Pathway" which is a more appropriate term for the abbreviation of the SIDS Accelerated Modalities of Action. https://sidsnetwork.org/samoa-pathway/