



**AZERBAIJAN REPUBLIC
ECOLOGY AND NATURAL RESOURCES
MINISTER**

No 4/2294
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Mr. Robert Gabel
Chief, Division of Scientific Authority
Fish and Wildlife Service
United State Department of the Interior

Dear Mr. Robert Gabel,

We have received your fax in which you requested information on the status of beluga sturgeon in Azerbaijan in connection with a proposed rule to list the beluga sturgeon as Endangered under the U.S. Endangered Species Act of 1973.

We are pleased to give our comments and have to emphasize that this species is in need of increased protection and conservation measures in the Caspian Sea. Available landings records show that the catch of beluga in the Caspian Sea has significantly dropped during the last decades. This convinces us that Caspian sturgeon should be managed very conservatively and we should recognize that continued fishing pressure on these populations is not affordable.

We have already had a practice of listing sturgeon species as endangered. Azerbaijan is the first country to have proposed halting a commercial catch of another species of the *Acipenseriformes*, *Ship sturgeon* (*A. nudiiventris*). It was listed it in the Red Data Book of Azerbaijan in 1994.

The commercial catch quota allocated to Azerbaijan for *H. huso* in 2002 is 5500kg. Fishing companies of Azerbaijan engaged in commercial catch of sturgeon are interested in the beluga sturgeon which is the most valuable among the *Acipenseriformes* and sales of which constitute a major part of the country's revenue. However, on the other hand, given current beluga stock estimations in the Caspian Sea, there have been serious doubts raised about the possibility of catching enough beluga sturgeon to fill up the quota. At this stage it would make much sense if the allocated quota were used for reproduction purposes rather than for commercial catch. The most serious concern for *H. huso* is the availability of

adult fish to constitute the broodstock of hatcheries and if commercial catch is continued on the same level there simply may not be enough mature beluga sturgeon remaining in the Caspian Sea to support a fishery in the future. The population of beluga needs to be restored to healthy levels of abundance with a normal age structure before sustainable fishing can resume.

We, therefore, support the proposition to list the beluga sturgeon as Endangered under the US Endangered Species Act and believe that this action will produce the expected resonance and effect to make respective authorities undertake necessary measures for the conservation of sturgeon population.

Attached is a Beluga Surgeon Fact Sheet summarizing available data on this fish. We hope that the information provided will be useful and help to make the most appropriate decision with regard to the above proposition.

Sincerely,

Gussein Bagirov
Minister

A handwritten signature in black ink, appearing to be 'G. Bagirov', written in a cursive style.

Beluga Sturgeon Fact Sheet

Historically the species of *H. huso* spawned in the Kura River. The coastal waters of Azerbaijan are important feeding grounds for *H. huso*, which feeds primarily on fish such as sprat and *kilka*.

Along the northern and southern coast of Azerbaijan, within the 200-nautical mile Exclusive Economic Zone, *H. huso* is caught as by-catch in stationary nets and *kilka* (Clupeidae) fishing devices. Young and adult fish are caught by coastal fisheries during migration. Juvenile fish comprise up to 17.7% of the by-catch. Adult *H. huso* are caught in spring and autumn. This fishery is carried out in low salinity waters.

Species composition of the total catch in the 1990s

	<i>A. persicus</i> & <i>A. gueldenstaedtii</i>	<i>A. stellatus</i>	<i>Huso huso</i>	<i>A. nudiiventris</i>
Catch	63.47%	30.77%		5.76%
By-catch	78.50%	16.80%	3.70%	1%

Annual recorded landings of *H. huso* (tonnes)

	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000
<i>H. huso</i>	27.0	21.0	49.0	74.6	33.3	29.5	24.1	22.3	13.1	20.0	2.1
Total	71.0	98.2	111.0	140.1	201.5	192.5	120.3	120.0	82.4	100.9	63.3

Export quotas for *H. huso* and its hybrids (kilogrammes)

	1998		1999		2000		
	Caviar	Meat	Caviar	Meat	Caviar	Meat	Fert. Eggs
Azerbaijan			434	13,000	700	7,000	
Bulgaria	2,500		2,400		2,500		
Iran	5,000		3,000		3,000		
Kazakhstan			6,000		3,600	56,000	
Romania			1,750	2,500	3,200	35,000	
Russian Federation <i>H. huso</i> x <i>A. ruthenus</i>	5,000		3,000		3,500	13,000	10 90
Turkmenistan					700		
Annual total	12,500	0	16,584	15,500	17,200	111,000	100

Catch quotas for *H. huso* allocated to Azerbaijan (tonnes)

	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001
<i>H. huso</i>	10	122	122								10.85	6.4
Total	200	308	510	480	380	182	160.5	160.5	160.5	108.67	108.35	74.5

Starting with the first sturgeon hatchery in the Caspian basin in 1954, three sturgeon hatcheries have been built along the Kura River in 1960s by the former Soviet Union.

These have a combined potential capacity of 20 million sturgeon fingerlings a year. Two million *H. huso* fry were released annually in the Kura River from 1967 to 1980. However, lack of funds, deteriorating facilities, flooding of the Kura River and the rising waters of the Caspian Sea have significantly reduced the national output of sturgeon fry. World Bank funds have been allocated for the construction of a new sturgeon hatchery and farm that will have the capacity to produce 15 million fry per annum. This should be operational the next year, late 2003.

Number of sturgeon fry released into the lower Kura River (million fingerlings)

	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001
<i>H. huso</i>	0.406	0.144	0.450	0	0	0	0	0.072	0	0.182	0.357	0.274
Total	17.523	9.082	2.960	1.838	1.142	1.242	4.070	6.065	6.220	20.280	18.965	12.873

In 2002 14.9 million fingerlings including 0.163 million of beluga, 10.250 million of ossetra, and 4.577 million of sevruga have been produced by the three operating sturgeon hatcheries: The Ali-Bayramli Sturgeon Hatchery; The Kura-mouth Sturgeon Hatchery; and The Kura Experimental Sturgeon Hatchery. At present preparations are being undertaken by the hatcheries for the autumn round of sturgeon fingerlings production in the amount of not less than 2.5 million dependent on the availability of matured broodstock specimens.

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