**Application for approval of a Wildlife Trade Operation for the export of preserved, articulated and restored taxidermy specimens of sharks, rays and other fishes**

Background and Proposal

Elasmo-Morph (also trading as Clean-a-Jaw) has been involved in the preparation and restoration of marine fishes, predominantly sharks and rays, since 1985 and now operates a working studio in Sydney, NSW.

The main activity of the company has been in the preparation of shark jaws, shark skulls and full shark skeleton mounts for both collectors, researchers and educational facilities such as Museums and Government Fisheries departments throughout Australia.

Over a period of time, the interest in such specimens has caused a spike in the number of requests from International individuals and research institutes in prepared shark specimens. Although Elasmo-Morph had been preparing restored specimens for clients overseas, there has been a growing demand for both prepared jaws and skulls from international institutions/museums.

This demand has been caused by a number of factors, the main ones being:

The increased visibility of "Elasmo-Morph" via social media
A well designed website which allows the client to view the products and purchase
The fact there are less than a handful of players who specialise in the preparation of shark specimens at a commercial level, not only in Australia but also overseas.
Many Museums and research institutes do not have the knowledge base to prepare such specimens and therefore have to rely on plastic reproductions.
A growing interest in the use of real specimens instead of reproductions, both for display purposes and research.

The applicant, "Elasmo-Morph" is seeking approval as a Wildlife Trade Operation for the export of prepared and preserved specimens of sharks and rays, other than those species listed in Appendix I of CITES or listed as threatened under the EPBC Act, to private and commercial collectors, Museums, research and educational institutes.

The applicant, although not in possession of a Taxidermy licence, as none are available for the preparation of fishes, is in possession of a special permit that has been issued by the NSW Department of Primary Industry (NSWDPI) for the preparation of threatened species, known as an s37 Permit (Permit number FP22/58).

Species Proposed

As most of the shark species being caught commercially by fishermen, are on the Appendix II listing on CITES, the proposal will be for such species, other than those listed on Appendix I of CITES or as deemed threatened under the EPBC Act.
In addition, included non-native shark species listed under Appendix II and III of CITES that have been lawfully obtained as a result of commercial fisheries or obtained as deceased specimens from captive held stocks (such as aquariums and research institutes in Australia and overseas).

Location of Harvest/Source of Specimens

Most of the shark specimens will be sourced from commercially approved fisheries companies, employing a variety of fishing methods such as longline, nets, and traps. In addition, specimens will also be obtained from those animals who have died from natural causes in both private and institutional collections. Most of these will be sourced in Australia, though at times they will also be sourced from specimens held in overseas collections.

The location or sourcing of such specimens will not be limited to particular states in Australia, however must conform to the various state or territory legislations.

Description of Harvest/Collection

Specimens collected for the purpose of articulating and skeletonising, will be stored as frozen stock, or in some instances vacuum sealed and then frozen, in the case of smaller (less than 1.5 metres) whole specimens.
In some instances, shark jaws from old collections (predominantly White shark jaws) sourced from overseas with the appropriate export and import CITES permits, will also be held as stock, either to be restored for clients or to be then restored and sold to clients, although they will need to comply with the various State and Territory legislations.

Aims and Objectives of the Operation

The aim of this operation is to utilise parts of the shark (head, sometime jaw, smaller, non-commercially viable specimens of deep water sharks) which would otherwise be discarded as not being viable to sell for the purpose of taxidermy. It is also to prepare specimens that have been caught as bycatch by government and education institutes who wish to prepare the specimen for educational purposes.
The objective of the operation is to supply both the domestic and overseas market of private collectors, institutions and museum collections with unique shark specimens to satisfy their requirement for prepared and articulated taxidermied specimens.

Harvest/Collection details

The harvesting and collecting of these shark specimens, can be divided into 3 groups: Wild stock, Captive stock and old collections specimens.

Wild stock sources would be:
Commercial fishing operations
Government departments (DPI Fisheries)
Dead animals found on the beach or at sea

Captive stock sources would be:
Aquariums
Private zoos and public zoos
Aquarists
Suppliers to commercial and private aquariums

Old collections specimens would be:
Old jaws held in a private collections, both in Australia and overseas
Vintage jaws held by commercial museums both in Australia and overseas
Old jaws held by research and educational institutes

Specimens can also be sought from private collectors, however they will be required to provide “proof of provenance” for specimens which are on Appendix II of CITES.

Commercial shark traders and suppliers

The number of operators dealing specifically with sharks is miniscule, not only in Australia but also worldwide. Most operators who deal with the sale of shark jaws or parts of sharks are collectors or commercial fishing operators who would sell such items in accordance with State and Territory legislations and CITES rules for certain species.

Primarily, commercial fishing operators have licences which allow them to fish certain species of sharks and follow strict government quotas.
Collectors have specimens of sharks which require to have paperwork showing proof of provenance, especially for those specimens which are on Appendix II.

Each state has its own regulations regarding the possession and sale of certain shark species, including the greater restriction on the sale and possession of White shark products, especially in South Australia and Western Australia.
As there are no licences available for the preparation of taxidermied fish, let alone sharks, all specimens that are either prepared, or bought and restored, will be accompanied by the required documentation showing their proof of provenance. Any that do not have any supporting documents, will be rejected.

Impact of fishing on the species

In the case of sharks, the Government has some very strict quotas in place when it comes to the harvesting of sharks in Australian waters. Commercial fishers are required to land sharks with their fins naturally attached, gutted and with the head removed. This helps with the identification of the species, as sometimes the fins are not enough to identify the species caught. This also prevents the practice of finning the sharks at sea and dumping the bodies.
There are catch limits and other measures in place to manage the total allowable catch of certain shark species.
In addition, certain species are listed as threatened under the EPBC Act of 1999, whereby it is illegal to kill, injure, take, trade, keep or move them without a permit on Commonwealth land or in Commonwealth water.
Australia has a national shark plan that acts as a guide to the management and conservation of sharks, including actions to minimise the impact of fishing on sharks, research and monitoring, sustainable use of shark resources and international collaboration to contribute with the global shark conservation. It is called Shark Plan 2, and was implemented in 2012, and later revised in 2024. One of the Issues, Actions and Priorities of Shark Plan 2 (Issue 3) is “Full utilisation of dead sharks and an improved understanding of the markets for and trade in shark products”. This would mean that the purchase of sharks heads and shark jaws would ensure that all parts of sharks caught commercially will be utilised.
The use of commercially caught sharks would pose no threat to the environment or their numbers as their quota (harvesting) is strictly monitored by the various State and Territory legislations.
The use of specimens which have been provided to me by Government departments (DPI Fisheries in various states) for articulation and preparation, would have no direct impact on the numbers, as such specimens are rarely caught, and if they are, they would be utilised fully for educational purposes.
The restoration of old jaws would be mostly from overseas sellers, from old collections, and therefore have no direct impact on current shark stocks.
Any specimens given to me by research institutes, museums and researchers would have no impact on current stocks, due to the very low numbers of specimens involved.

Compliance with current legislations

No licences available at this stage for taxidermy of fish or sharks

Record keeping and spreadsheets

As part of my record keeping of the species I have in my possession, I have prepared an Excel spreadsheet containing all the jaws, heads and whole sharks in my possession with tag numbers and sent it over to the CITES office in Canberra for their records.
This ensures that the office can identify the correct specimen when I sell one overseas, by comparing the tag numbers on the spreadsheet with the application form online.
I also keep a record book of all the clients I either buy from or sell to.

I also keep a register of all species provided to me by DPI Fisheries which enables the identification of the species in question, the source of each specimen and the Fisheries officer who supplied the specimen, the processing undertaken, any parts that have been disposed of and details of the person or organisation receiving the specimens.

Further background information

Elasmo-Morph (formerly known as Clean-a-Jaw) has been operating for nearly over 30 years. What started off as cleaning shark jaws for Game fishermen in the late 1970's, has turned into a scientific based operation which is now connected worldwide with various collectors, researchers and Museums.
The art of preparing cartilaginous skeletons is very poorly practiced due to the degree of difficulty involved in such a task. In most cases, many museums and exhibition venues prefer to use 3D models and/or virtual reality displays. This is due to a lack of knowledge in preparation techniques and a general difficulty in sourcing shark specimens.
At Elasmo-Morph I make sure that all the specimens I use are sustainably and legally caught and can be then exported or sold, both within Australia and overseas, to people and institutes who will avail themselves of such important educational pieces. With the number of pieces available to purchase overseas and current stock available for sale, together with the utilisation of commercial fisheries who are WTO approved, there is the means to be able to supply specimens both within Australia and overseas, with minimal impact on wild stocks

Currently, examples of my work are exhibited with the following institutions:

DPI Fisheries NSW
Australian Museum, Sydney
Oceanopolis Brest, France
Staatlichen Museum fur Naturkunde Karlusche, Germany