



**INTERNATIONAL COALITION OF FISHERIES ASSOCIATIONS RESOLUTION ON THE  
CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND  
FLORA (CITES)**

**8 November 2022**

The International Coalition of Fisheries Associations (ICFA) is a coalition of national fish and seafood industry trade associations from the world's major fishing nations. ICFA members advocate policies for the long-term sustainable use of living marine resources for the benefit of global food security and prosperity and are deeply committed to science based and fully participatory fishery conservation and management processes. ICFA recognizes that sustainable use of marine living resources contributes to global food security and nutrition, livelihood in coastal areas including those in developing countries among others. Fishing activities that conduct sustainable use of such resources should not get denied in an unreasonable manner.

**Preface**

CITES is a global agreement among governments to regulate or ban international trade in species under threat. Every two to three years, parties to CITES meet to review progress and adjust the lists of protected species. In recent meetings, certain member Parties have proposed the inclusion blue shark and sea cucumbers in Appendix II of CITES.

**The International Coalition of Fisheries Associations (ICFA) notes that:**

**Blue Shark:**

Status and trends of Blue Shark (BSH) populations:

- The fishing industry recognizes the work of CITES to ensure that the international trade does not threaten the survival of marine species.
- The biological characteristics of the species are not at all comparable to those of other elasmobranch species of the family or genera/species specifically named in the Panama proposal. The blue shark is the **most widely distributed, fertile and a fast-growing species of elasmobranchs**.
- The available data on biomass of BSH from the different stocks widely distributed in the Atlantic, Indian, and Pacific oceans evidence **high production and turnover rates**. To the point that in many cases all these factors, including the biomass, are even much higher than that of other large pelagic species of bony and cartilaginous fish. These would include some species of tuna, billfish (including swordfish) and other large pelagic sharks.
- The available data show a **healthy abundance of BSH populations** across ocean basins. The high prevalence of the BSH taken in fisheries across decades are evidence of a healthy stock status and its high turnover rate, evidence corroborated by the observations across fleets and available biological studies.<sup>1</sup> Consequently, the

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<sup>1</sup> <http://www.co.iceo.es/tunidos/documentos/iccat/CV058030951.pdf>

broad geographic distribution of this species coupled with its efficient reproductive strategy are some elements that have clearly been conducive to its success as a species.

- In the majority of RFMOs, all scenarios indicate that stocks are **not overfished, and that overfishing is not occurring**<sup>2</sup> therefore the status of BSH is not endangered by fishing or trade.
- Sustainable fisheries management is the best tool to ensure ongoing conservation and sustainable harvest of BSH populations.

#### Resemblance with species included in Appendix II of CITES

- The International Coalition of Fisheries Associations, ICFA, disagrees with the statement in the Panama's proposal that visual identification between members of the family of Carcharhinidae and blue sharks is impossible. The sector is shocked to learn that public authorities are seriously considering restricting trade just because BSH may look like other sharks for the untrained eye.
- First, blue sharks, including their fins, have **clearly distinguishable biological characteristics** that can be verified by fisheries inspectors (as it is the case with many other morphologically similar species). (See ANNEX 1: *Shark Fin Guide*)
- Second, in many parts of the world, the fins must remain attached to the body up until the place of landing. Once landed and then exported, governments issue a **catch certificate** that accompanies the fish up until it reaches the consumer.
- The **fin** of the blue shark (*Prionace glauca*) is **easily distinguishable**, even separated from the body, due to its characteristic metallic blue coloration, because it lacks spines at the base of the fin and presents a typical indentation (keel) in the peduncle. IT tools such as *iSharkFin8* that uses machine learning techniques to identify shark species from shark FAO.<sup>3</sup>

The proposal to list all species (about 60 species) belonging to the family Carcharhinidae (requiem sharks) is **not scientifically justified** and therefore unfounded. It also **calls into question the capacity of RFMOs** to manage commercial fish stocks.

#### Governance & management

- Responsible fisheries decision-makers should analyze commercial species on a case-by-case basis, and not families. **RFMOs** such as ICCAT or IOTC, are **better suited** in this case to closely monitor the state and progress of blue shark stocks and to regulate the species accordingly.
- Blue sharks are **sustainably managed** by international fisheries management bodies (RFMOs) and protected thanks to strong fins-attached policies as well as catch documentation schemes.
- All tuna RFMOs have adopted **prohibitions on finning**.

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<sup>2</sup> <https://iotc.org/documents/stock-assessment-blue-shark-indian-ocean>  
[https://www.iccat.int/Documents/CVSP/CV072\\_2016/n\\_4/CV072040866.pdf](https://www.iccat.int/Documents/CVSP/CV072_2016/n_4/CV072040866.pdf) &  
Stock assessment of Southwest Pacific blue shark: <https://meetings.wcpfc.int/node/13209> (page 49)

<sup>3</sup> <https://www.fao.org/ipoa-sharks/tools/software/isharkfin/en/>

- The widely ratified **Port State Measures Agreement** requires verification and inspections on fishing vessels entering ports to ensure they comply with measures adopted by RFMOs and international conventions.
- At regional level, ICCAT has adopted strong management measures, including **total allowable catches** (TACs). In 2021, following scientific advice, ICCAT adopted 28,923 t for South Atlantic blue shark and 38.232 t for North Atlantic blue shark for 2022. These measures allow for a sustainable harvesting of blue shark populations.

#### Trade

- Blue sharks are largely caught during target fishing for tunas and swordfish, mostly in longline fisheries. It also represents an important part of the catch for certain fleets for which blue sharks are a target species. It is a rich source of protein for domestic consumption and international trade. Blue shark fins and meat are traded, however according to FAO, new austerity regulations in market states have seen **market declines in the fin trade** e.g., volumes at about half of post-2003.<sup>4</sup>
- The Notification 2022/043 from Panama does not provide any information on the **impacts of fishing and trade on BSH populations**, that is necessary for CITES parties to examine the results and effects of listing blue shark. Particularly, there is no evidence in the information provided by Panama that international trade is driving the decline of BSH species. Furthermore, ICFA is unaware of **reports from enforcement/custom officers** reporting general issues with illegal trade of blue sharks nor difficulties in distinguishing BSH from other shark species.

#### Socio-Economic Impact:

- According to the 7<sup>th</sup> *FAO Expert Advisory Panel For the Assessment of Proposals to Amend Appendices I and II of CITES concerning Commercially-Exploited Species*, the listing of blue shark in Appendix II of CITES, will undoubtedly bring about unnecessary **red tape, trade disruptions and adverse socio-economic effects** that must be analyzed.<sup>5</sup>

#### Sea Cucumbers

##### Status and trends of genus *Thelenota* Sea Cucumber populations:

- The fishing industry recognizes and supports the work of CITES to ensure that the international trade does not threaten the survival of marine species.
- Many statements made in the CITES listing proposal 42 are unqualified in relation to the CITES criteria. The quality, quantity, availability and consistency of data related to *Thelenota* species were not strong. Much of the information provided in the proposal involved single snapshot fishery related surveys that included *Thelenota* species, and longer term regular standardized surveys were not available for many locations.
- There are no total population estimates for *Thelenota* stocks, although measures of *T. ananas* and *T. anax* density estimates have been used in some cases to produce standing stock estimates to set allowable catches. *T. rubralineata* are found rarely and overall population estimates are unknown.

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<sup>4</sup> <https://www.fao.org/3/ca3914en/ca3914en.pdf>

<sup>5</sup> FAO. 2022. *Report of the Seventh FAO Expert Advisory Panel for the assessment of the proposals to amend Appendices I and II of CITES concerning commercially-exploited aquatic species* – Rome, 18–22 July 2022. Rome. <https://doi.org/10.4060/cc1931en>

- While we recognize that lack of long-term robust data is not optimal for commercially exploited sea cucumber species, it does not necessarily imply that the species is threatened or endangered by fishing or trade.
- Information on the status of *T. ananas* stocks shows that they have largely been resilient across their range. There are numerous examples of long time-series of fisheries data spanning decades show regular and consistent exports of *T. ananas* from a range of countries (e.g., Australia, New Caledonia, Papua New Guinea, and Tonga).
- In Queensland Australia, for example, records of *T. Ananas* harvests over the past 27 years through logbook data demonstrates that its catch per unit effort (CPUE expressed as kg/day), a common measure of relative abundance, shows no evidence of decline. In fact, average catch rates, particularly for reporting grids with the highest catches, increased after the late 2000s and have remained variable but stable, generally above the upper 2 x baseline average. These catch rates are relatively high compared to management reference points.
- *T. ananas* is recorded across a wide range of habitats at depths that make harvesting difficult for most breath-hold divers for a large component of the stock. It is mostly broadly distributed within its range (not highly aggregated in patches) and has an inherent productivity conservatively assessed as moderate. Hyperstability of CPUE (masking of depletion by serially fishing down different aggregations), a concern with fishing of sea cucumber species, is less likely an issue for more uniformly distributed populations.
- *Thelenota anax* and *T. Rubralineata* are species with extremely low commercial value and demand and have rare and patchy distribution. One of the best managed sea cucumber fisheries in the world in Queensland Australia over the past 27 years has not found a market for either of these species so they are not commercially harvested. It is difficult to understand why these have been included in the nomination with respect to international trade.

#### Resemblance with species included in Appendix II of CITES

- No “look-alike” provisions required for this genus. The three species of *Thelenota* are easily differentiated from each other and other sea cucumbers in both live and dried forms.

#### Trade

- Of all of the *Thelenota* group, *Thelenota ananas* (Prickly Redfish) is the only species with any significant level of trade, but even this species is not particularly popular because **it is bitter and has poor eating characteristics**. As a result, this species is seen in international trade, but only in limited volumes and for certain parts of the market.
- The reports of *T. ananas* being of high value in the CITES proposal are incorrect. In Australia, it is considered a tier two sea cucumber market species with a current wholesale value of USD 55 per kilo for large, A-grade, dried weight which equates to less than USD 9 per live weight individual, not considering processing or shipping costs. The price is likely lower for less well-processed products from countries that have lower awareness and capacity for bêche-de-mer preparation. Australia has only one buyer of *T. ananas* globally compared to 20 to 40 buyers for all tier 1 species.
- The evidence of significant trade in *Thelenota* species is **not well documented** and the proposal confirms this position. Of the group, *T. ananas* is the only species with any real level of international trade and it is traded in

very small volumes due to its bitter taste.

- The lower market value of *T. anax* and *T. rubralineata* species is a mitigating risk factor, as the cost of processing sea cucumbers, even for artisanal fishers, means there is a negative incentive to continue harvesting at low densities.
- Both *Thelenota anax* and *T. rubralineata* do not meet the CITES criteria because they will not (now or in the future) become threatened with extinction because of international trade in specimens.

#### Socio-Economic Impact:

- According to the 7<sup>th</sup> FAO Expert Advisory Panel For the Assessment of Proposals to Amend Appendices I and II of CITES concerning Commercially-Exploited species, CITES listing of *Thelenota* spp. could have inequitable and deleterious impacts on remote small-scale and artisanal fishing communities regardless of the status of their sea cucumber stocks.

#### FAO Expert Panel Recommendation:

- The Expert Panel assessed *Thelenota* spp. resilience across 27 range states. From an analysis of the best available scientific data and technical information on historical extent and short-term rates of decline taken together, including on levels of the genus in trade, *Thelenota* spp did not meet the CITES listing criteria for Appendix II.

#### **Therefore, ICFA calls for members Parties to-**

1. Reject the proposal by Panama to include blue shark and all other species belonging to the Carcharhinidae family in Appendix II of CITES.
2. Reject the inclusion of the three genus *Thelenota* sea cucumber species in Appendix II of CITES. Genus *Thelenota* do not meet the CITES listing criteria for Appendix II.
3. Reconsider process and materials that member Parties utilize in determining their position for voting and reaffirm that any decision-making for commercially utilized aquatic species to be included in CITES should be science-based, respecting views presented by the FAO Expert Advisory Panel for such species.

ANNEX 1: FAO Shark Fin Guide: A guide to the Identification of shark species from the fins. <sup>6</sup>

***Carcharhinus longimanus*** (Poey, 1861)

(CARCHARHINIFORMES, CARCHARHINIDAE)



-  Oceanic whitetip shark
-  Requin océanique
-  Tiburón oceánico

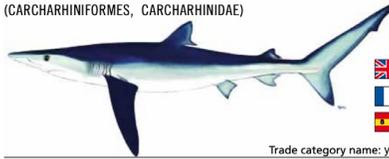
Trade category name: 扁 魬; 流 球 (Clarke, 2006a;b)

FIN IDENTIFICATION CHARACTERISTICS



***Prionace glauca*** (Linnaeus, 1758)

(CARCHARHINIFORMES, CARCHARHINIDAE)



-  Blue shark
-  Peau bleue
-  Tiburón azul

Trade category name: 牙 鯊 (Clarke, 2006a;b)

FIN IDENTIFICATION CHARACTERISTICS



***Sphyrna lewini*** (Griffith and Smith, 1834)

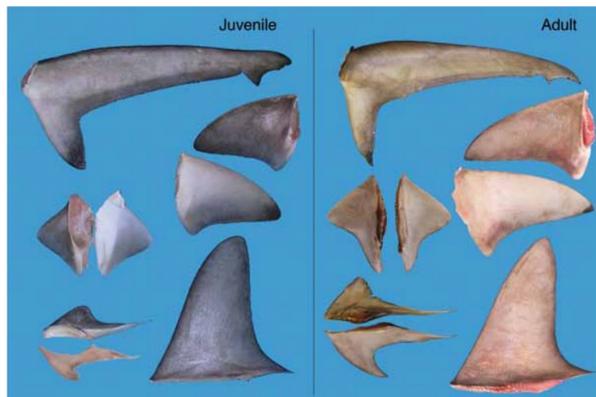
(CARCHARHINIFORMES, SPHYRNIDAE)



-  Scalloped hammerhead
-  Requin-marteau halicorne
-  Cornuda común

Trade category name: 春 翅 (Clarke, 2006a;b)

FIN IDENTIFICATION CHARACTERISTICS



<sup>6</sup> <https://www.fao.org/publications/card/en/c/003a90da-eea6-4951-a2bf-c402c6ddc385/>