

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES  
OF WILD FAUNA AND FLORA



Thirty-second meeting of the Animals Committee  
Geneva (Switzerland), 19-23 June 2023

Species conservation and trade

Aquatic species

Seahorses (*Hippocampus* spp.)

REPORT OF THE SECRETARIAT

1. This document has been prepared by the Secretariat.
2. At its 19th meeting (CoP19; Panama City, 2022), the Conference of the Parties adopted Decisions 19.228 to 19.232 on *Seahorses* (*Hippocampus* spp.) as follows:

***Directed to the Secretariat***

**19.228** *The Secretariat shall:*

- a) *subject to external funding, collaborate with Parties and species experts to prepare a report on the global illegal trade in seahorses, for consideration by the Standing Committee. The report should include an analysis of extracted data from the CITES illegal trade database, consultations with regional enforcement networks as applicable, analysis of illegal trade routes, modus operandi and seizures, and information contained in the studies prepared in response to Decision 18.229 paragraph c) i); and*
- b) *report on implementation of paragraph a) of the present Decision to the Standing Committee at its 77th and 78th meeting.*

***Directed to source, transit, and consumer Parties for which there is evidence of illegal and/or unsustainable international trade in dried seahorses***

**19.229** *To effectively implement the inclusion of seahorses in Appendix II of CITES, source, transit, and consumer Parties for which there is evidence of illegal and/or unsustainable international trade in dried seahorses are encouraged to:*

- a) *collaborate with key stakeholders and species experts to develop national or regional plans of action to improve CITES implementation for seahorses and should include the following, inter alia:*
  - i) *encouraging collaboration and communication between key stakeholders at a national and regional level, including Environment, Fisheries and Enforcement agencies, with respect to CITES implementation and data gathering for the international trade in seahorses;*
  - ii) *improving monitoring, detection and law enforcement activities related to seahorses in coastal areas and at transaction points (e.g. in the marketplace, online, in maritime areas, and at air- and seaports);*

- iii) *submitting comprehensive and accurate information on illegal international trade in seahorses in their annual illegal trade reports to the Secretariat, as required in compliance with Resolution Conf. 11.17 (Rev. CoP19) on National reports, and in support of Decision 19.228, paragraph a);*
  - iv) *addressing the main drivers of illegal and unsustainable trade by effectively regulating and constraining the operations of non-selective fishing gears, such as bottom trawls and gillnets, to reduce their impacts on seahorses, and combating illegal, unregulated and unreported (IUU) fishing of seahorses by developing best practices for sustainable harvest; and*
- b) *share progress in developing and implementing these national or regional plans of action with the Secretariat for its report to the 33rd meeting of the Animals Committee.*

**Directed to Parties, intergovernmental and non-governmental organizations**

**19.230** *Parties, intergovernmental and non-governmental organizations are encouraged to provide financial and technical assistance to Parties to implement Decision 19.229 and any further recommendations made by the Standing Committee.*

**Directed to the Animals Committee**

**19.231** *The Animals Committee shall:*

- a) *in consultation with species experts, analyse and review the results of any activities under Decisions 19.228 and 19.229, the report produced under Decision 18.229, paragraph c) i), and other relevant available information;*
- b) *develop recommendations to the Parties, the Secretariat, and relevant stakeholders, as appropriate, to ensure sustainable and legal international trade in seahorses;*
- c) *consider recommending seahorses as a case study to the 2nd international expert workshop on non-detriment findings; and*
- d) *report on the implementation of the present Decision to the Standing Committee, as appropriate.*

**Directed to the Standing Committee**

**19.232** *The Standing Committee shall:*

- a) *analyse and review the results of any activities under Decisions 19.228 and 19.229, the report produced under Decision 18.229 paragraph c) i) and, as appropriate, the report of the Animals Committee produced in support of Decision 19.231;*
- b) *develop recommendations to the Parties and the Secretariat, as appropriate, to strengthen CITES implementation and enforcement for international trade in seahorses; and*
- c) *report on the implementation of Decisions 19.228 to 19.232 to the Conference of the Parties at its 20th meeting.*

Implementation of Decision 19.228

3. The external funding necessary for the implementation of this Decision, specifically to prepare the report on the global illegal trade in seahorses referred to in paragraph a) of Decision 19.228, is an estimated USD 40,000 (see Notification to the Parties No. [2023/024](#) published on 10 March 2023).

Implementation of Decision 19.231

4. Concerning paragraph a) of this Decision, there are no activities under Decisions 19.228 and 19.229 for the Animals Committee to review at this meeting.

5. At the 31st meeting of the Animals Committee (AC31; online, June 2021), the Secretariat noted in the [addendum](#) to document [AC31 Doc. 26](#) on *Seahorses* (*Hippocampus spp.*) that Project Seahorse, based at the University of British Columbia (UBC), had independently secured funding from the United States National Oceanic and Atmospheric Administration (NOAA) to undertake a study on seahorse trade.
6. The Project Seahorse study consisted of two parts: (i) a review of the changes in international trade in live seahorses (*Hippocampus spp.*) following the CITES Appendix-II listing; and (ii) an analysis of implementation of the CITES Appendix-II listing for dried seahorses (*Hippocampus spp.*), through the production of a series of implementation reports, focusing on a selection of net exporters of seahorses that have declared national bans or suspensions for such exports and a selection of key importers for dried seahorses.
7. Paragraph a) of Decision 19.231 mentions the report produced under Decision 18.229, paragraph c) i) for submission to this meeting. This refers to summaries that were commissioned by the Secretariat from Project Seahorse of its study referred to in paragraphs 5 and 6 above, focusing on those aspects that were relevant to the CITES mandate. The summaries were presented to the 74th meeting of the Standing Committee (SC74; Lyon, March 2022) in English, in Annex 1 (the live trade review) and Annex 2 (the implementation analysis) to document [SC74 Doc. 70.1](#) on *Seahorses* (*Hippocampus spp.*).
8. At CoP19, the Secretariat pointed out in its comments on the Standing Committee's document on seahorses (document [CoP19 Doc. 69.1](#)), that the Annexes in document [SC74 Doc. 70.1](#) were intended to form the basis of the expert workshop called for in Decision 18.229 c) ii), but that the workshop itself would not take place until after CoP19. The objective of the proposed workshop was to discuss the implementation and enforcement of CITES for trade in *Hippocampus spp.*, including the recommendations and outcomes from the Review of Significant Trade process, and propose practical steps to address implementation and enforcement challenges. Furthermore, the Secretariat highlighted in its comments on document [CoP19 Doc. 69.2 on Next steps towards the successful implementation of the Appendix-II listing for seahorses](#), which was submitted by nine Parties, that this document conflicted somewhat with document CoP19 Doc. 69.1, as it appeared to pre-empt the outcome of the expert workshop that had not yet taken place and used the results of the studies produced under Decision 18.229 paragraph c) i) to come to conclusions before the Animals Committee and Standing Committee have had an opportunity to review them.
9. The Conference of the Parties adopted a set of Decisions that was merged from draft decisions in documents CoP19 Doc. 69.1 and 69.2. For the reasons outlined in paragraph 8 above, these Decisions are already based on some of the recommendations in the study referred to in Decision 18.229, paragraph c) i), which formed the basis of document CoP19 Doc. 69.2. However, the Animals Committee may wish to undertake its own review of these recommendations.
10. The recommendations from the summary report "Changes in the international trade in live seahorses (*Hippocampus spp.*) after their listing on CITES Appendix II" contained in Annex 1 to document SC74 Doc. 70.1 are presented in Annex 1 to this document. The recommendations from the report "Implementation of CITES Appendix II listing for seahorses in the context of export bans and suspensions" contained in Annex 2 to document SC74 Doc. 70.1 are presented in Annex 2 to this document.
11. The Animals Committee is also invited by the Conference of the Parties to review any other relevant information available. The Secretariat notes that document [AC32 Doc. 38.2](#), submitted by the Philippines and the United States of America, contains the results of an Asian regional workshop on seahorses that the Animals Committee may wish to consider to develop recommendations to ensure sustainable and legal international trade in seahorses, in the context of paragraph b) of Decision 19.231.
12. Concerning paragraph c) of this Decision, the Secretariat would also like to draw attention to document [PC26 Doc. 17/AC32 Doc. 16 on Non-detriment findings](#), in particular Annex 3 containing the working groups' terms of reference. The terms of reference for group 5 on *NDFs for marine and aquatic species* includes seahorses as a possible case study to be considered at the 2nd international expert workshop on non-detriment findings.

### Recommendations

13. The Animals Committee is invited to:
  - a) note the information in this document; and
  - b) consider establishing an intersessional working group with a mandate to:

- i) review available information on trade in seahorses; including the recommendations contained in Annexes 1 and 2 to this document, taking into consideration the issues raised in paragraphs 8 and 9 above; and the recommendations of the expert workshop contained in document AC32 Doc. 38.2; and
- ii) produce a consolidated set of recommendations for consideration by the Animals Committee at its 33rd meeting.

**Recommendations from the summary report  
“Changes in the international trade in live seahorses (*Hippocampus* spp.)  
after their listing on CITES Appendix II”**

***Directed to CITES***

Working in collaboration with species experts, CITES should establish the following tools and training materials to help Parties implement the Appendix II listing for live seahorses. The tools and materials should be simple and pragmatic to facilitate their application in a wide range of national situations.

- Guidance on how to make NDFs for wild and source code F live seahorse exports. This can be based on existing guidance for making NDFs for seahorses (Foster and Vincent 2016) and recommendations from a previous CITES workshop (Bruckner et al. 2005).
- Guidance on how to make LAFs for wild and source code F live seahorse exports. Such guidance is needed for seahorse trade generally (dried and live).
- Guidance on how to monitor wild populations in support of adaptive management. This can be based on existing guidance on monitoring seahorse populations in situ and through seahorse fisheries (Foster et al. 2014; Loh et al. 2014).
- Guidance on tracking extraction of wild broodstock for culture operations, and its implication for wild populations, whether F or C. This can be derived from existing guidance developed for Viet Nam (Project Seahorse 2015).
- Guidance on how to distinguish between seahorses that are wild source, source code F and source code C, using recommendations from a previous CITES workshop as a starting point (Bruckner et al. 2005).
- Identification guides for live trade in multiple languages. These can be based on existing identification tools for seahorses (Project Seahorse 2021).

In addition, CITES needs to enhance its own guidance to support the App II listing for seahorses. CITES should:

- Update its annual reporting guidelines to specify that live seahorses are to be reported as individuals (and dried seahorses in weight; Foster et al. 2016; Foster 2021).
- Review the IATA regulations for seahorses, which are the basis of CITES own guidelines for air transport of live wild animals and plants (CITES 2013a), to ensure they are clear and appropriate to minimize unnecessary confiscations of live seahorse shipments.

CITES should further:

- Invite Parties to provide information on how they are making taxon specific NDFs to be shared with other CITES Parties for their consideration (in support of Decision 18.230).
- Invite Parties to provide information on how they are making taxon specific LAFs to be shared with other CITES Parties for their consideration.
- Invite Parties to inform the Secretariat of any national management measures that regulate or restrict international trade in seahorses (e.g. quotas, trade suspensions); and how they are implementing and enforcing such measures for seahorses (in support of Decision 18.230).
- Communicate the existence of national quotas, including any zero quotas, and trade suspensions to CITES Authorities through a Notification to the Parties and through its website.
- Require that Parties report import quantities of Appendix II listed species in their annual reports to CITES for including in the CITES trade database.

- Formalise a process by which the need for NDFs for source code F exports can be scrutinised and Parties held accountable. This might mean including source code F in the Review of Significant Trade (Res. Conf. 12.8 (Rev. CoP18)) or expanding the captive breeding resolution (Res. Conf. 17.7 (Rev. CoP18)) to include scrutiny of NDFs for wild caught parents of source code F exports.
- Work with the IUCN SSC Conservation Translocation Specialist Group (CTSG, [iucn-ctsg.org](http://iucn-ctsg.org)) to establish guidance on the risks of aquaculture and releases to wild populations of CITES listed species.

### **Directed to Parties**

Parties exporting, or planning to export, live seahorses should:

- Use existing tools as appropriate for effective CITES implementation and enforcement that are relevant to seahorses (in support of CITES Decision 18.231). These are available on the IUCN SSC Seahorse, Pipefish and Seadragon website ([www.iucn-seahorse.org/cites-toolkit](http://www.iucn-seahorse.org/cites-toolkit)).
- Meet their obligations to the Convention by making NDFs and LAFs for wild and source code F exports.
- Share copies of their NDFs for wild and source code F live seahorse exports with the Secretariat for posting on the CITES website to assist other CITES Parties (in support of CITES Decision 18.230).
- Share copies of their LAFs for wild and captive born live seahorse exports with the Secretariat for posting on the CITES website to assist other CITES Parties.
- Inform the Secretariat of any national management measures that regulate or restrict international trade in seahorses (e.g. quotas, trade suspensions); and how they are implementing and enforcing such measures for seahorses (in support of Decision 18.230).
- Develop and execute long-term monitoring programmes for seahorses in their national waters to guide adaptive management (in support of CITES Decision 18.231).
  - o Monitoring in situ usually consists of underwater surveys of seahorse populations (using SCUBA or snorkel). Fisheries monitoring includes documentation of catch and effort data along with basic information on population status and trends obtained via fishery-independent programs, or by subsampling commercial landings. Both types of programmes can be based on existing guidance for seahorse monitoring (underwater – Loh et al. 2014; fisheries – Foster et al. 2014).
- Enforce existing laws (e.g., trawling bans in specific areas, MPAs) which benefit the conservation of seahorses.
- Inventory and assess seahorse aquaculture operations to determine their production capabilities, degree of reliance on wild populations, and any environmental concerns.
- Ensure that any releases of tank raised seahorses only occurs according to guidelines established by the IUCN Conservation Translocation Specialist Group (<https://iucn-ctsg.org/policy-guidelines/conservation-translocationguidelines/>). Never release exotic species.

Importing Parties should:

- Voluntarily report import quantities in their annual reports to CITES for including in the CITES trade database.
- Request information on NDFs and LAFs when there are concerns about the validity of export permits, particularly for wild or captive born seahorses.
- Verify species identification on import. Identification can be done on a subset of individuals if a shipment is sufficiently large to preclude identification of all individuals.

**Recommendations from the report  
“Implementation of CITES Appendix II listing for seahorses  
in the context of export bans and suspensions”**

1. Jurisdictions should take note of IUCN Resolution WCC-2020-Res-107 (Annex III) which calls on governments to “establish/strengthen a national ministry/department/agency with an explicit mandate for marine biodiversity conservation.” These bodies should play a central role in implementing CITES for marine species, or supporting the implementation of CITES for marine species if they are not the designated national CITES Authorities.
2. Existing national MAs and SAs with marine expertise need to have higher levels of staffing and funding to meet their obligations to the Convention.
3. EFPs that play a role in enforcing CITES should be fully trained in the identification and legal requirements applicable to marine species.
4. All jurisdictions need to improve inter-agency cooperation with respect to CITES implementation and data gathering.
5. CITES Authorities should formalize the role of species experts from civil society (academia, NGOs etc.) in implementing CITES at the national level.
6. CITES Authorities should raise awareness of seahorse trade and its role in conservation of the species with all stakeholders: fishers, traders, consumers, policy makers, enforcement agencies, judiciaries etc.
7. Given the unreliability of formal data, jurisdictions should ensure access to up-to-date trade research in collaboration with species experts. The following jurisdictions need new trade field surveys: CN, HK, ID, MY, SG and TW. Sufficient baseline information exists in the other jurisdictions on which to base adaptive management plans in support of CITES implementation.
8. Parties should inform the Secretariat of any national management measures that regulate or restrict international trade in seahorses; and how they are implementing and enforcing such measures for seahorses (in support of Decision 18.230a). The Secretariat should make a list of national measures available on the CITES website (in support of Decision 18.229b).
9. Jurisdictions should actively enforce any seahorse trade bans/suspensions they declare.
10. CITES should promote meaningful export regulation by scrutinizing and tracking all declarations of export suspensions made during the RST process, imposing sanctions for failures to enforce these suspensions.
11. Parties should share copies of their NDFs for seahorse exports with the Secretariat for posting on the CITES website to assist other CITES Parties (in support of CITES Decision 18.230).
12. Parties should ideally share copies of their LAFs for seahorse exports with the Secretariat for posting on the CITES website to assist other CITES Parties.
13. CITES Authorities should address their responsibilities to seahorses as for other taxa listed on the Appendices.
14. To address the management challenges associated with seahorse bycatch that largely drives illegal trade, jurisdictions should: enforce existing laws around nonselective fishing gears; establish, expand and strengthen national inshore exclusion zones in which bottom trawling is prohibited; constrain non-selective gears in MPAs to ensure vulnerable habitats and ecosystems are effectively protected and recovered; end harmful subsidies for bottom trawling; and limit expansion of bottom trawling.
15. The Secretariat should create and publicize a repository on its website that includes a wide range of materials to support CITES implementation for seahorses, similar to that provided for sharks ([cites.org/eng/prog/shark](https://www.cites.org/eng/prog/shark)), for example (in support of Decision 18.228).

16. Governments should engage in-country taxon experts to support CITES implementation, as a way of amplifying capacity by deploying complementary skills and expertise. The corollary is that taxon experts need to partner with government to advance conservation agendas.
17. CITES and its Parties should work with Project Seahorse, host of the IUCN SSC SPS SG, to revise the NDF framework for seahorses to ensure it is applicable in data- and capacity-poor situations. This recommendation could be considered in the context of CITES Decisions 18.132 to 18.134 on NDFs.
18. CITES needs to increase Party awareness of the potential for advice from the IUCN SSC SPS SG, which has a global membership, with regional and thematic focal points. Likewise, jurisdictions should take note of IUCN Resolution WCC-2020-Res-095 (Annex IV) which calls on governments to “take note that the Species Survival Commission (SSC) Seahorse, Pipefish and Seadragon Specialist Group can provide assistance on how to conserve syngnathids.
19. To address the main drivers of illegal trade, governments need to constrain the operations of both traditional and mechanized non-selective fishing gear to reduce the impacts on seahorses, and to constrain illegal target methods of fishing seahorses.
20. CITES needs to conduct research on the convergence of seahorse IWT with that of other CITES listed species, with the aim of understanding potential for synergies with respect to improving CITES implementation at national and global levels.
21. Jurisdictions should take note of IUCN Resolution WCC-2020-Res-095 which calls on governments to “ensure that initiatives to combat Illegal Wildlife Trade (including e-commerce) include syngnathids, as appropriate” and “meet all CITES obligations for seahorses.”
22. CITES should collaborate with the TCM industry to provide purchasing guidelines that will advance implementation of the Convention for seahorses.
23. Governments should explore novel techniques for detecting seahorses in trade, such as eDNA or detector dogs.
24. Jurisdictions should take note of IUCN Resolution WCC-2020-Res-095 which calls on governments to:
  - a. “by 2022, ensure the status of all syngnathids is assessed and included in national/regional Red Lists as warranted;” and “support the work of the Seahorse, Pipefish and Seadragon Specialist Group in keeping the assessments of all syngnathids up to date”;
  - b. “by 2021, restrict syngnathid culture to operations that have been subject to an appropriate/careful risk analysis prior to proceeding, and where results have concluded that it is reasonable/safe to continue;” and
  - c. “by 2021, for any release, apply SSC guidelines for reintroductions and translocations.”<sup>1</sup>
25. CITES should work with the IUCN SSC Conservation Translocation Specialist Group (CTSG, [www.iucn-ctsg.org](http://www.iucn-ctsg.org)) to establish guidance on the risks of aquaculture and releases to wild populations of CITES listed species. Guidance within CITES Resolution Conf. 17.8 under Option 2 of Annex 1 provides a good starting point for such an effort.
26. Jurisdictions should collaborate with key stakeholders and species experts to develop national plans of action to advance CITES implementation for seahorses; these could relate to both enforcement and sustainability.
27. Jurisdictions should develop monitoring programmes for seahorses in their national waters to understand effectiveness of their trade rules and any other relevant implementation and enforcement actions for seahorse conservation and management; and share the design and initial results of these programmes to assist other CITES Parties (in support of Decision 18.231b and c).
28. Jurisdictions should build on the list of seahorse relevant regulations in Table 7 to inform enforcement efforts and provide the basis for making LAFs should they re-open trade.

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<sup>1</sup> <https://www.iucn.org/content/guidelines-reintroductions-and-other-conservation-translocations>



29. Jurisdictions should take note of IUCN Resolution WCC-2020-Res-095 which calls on governments to “enforce regulations on fisheries, area-based management, habitat protection, wildlife trade and other measures that affect syngnathids”.
30. Jurisdictions should take note of IUCN Resolution WCC-2016-Res-050 which calls on governments to “work towards designating and effectively implementing at least 30% of their national waters as MPAs and other effective area-based conservation measures, ..., by 2030”. In that context, jurisdictions should also take note of IUCN Resolution WCC-2020-Res-095 which calls on governments to “protect and restore freshwater, transitional and coastal habitats that are important for syngnathid species, using best practices.”
31. CITES needs to work with its Parties to improve data collection on and from seahorse seizures, particularly with respect to species identification, shipment routes and other wildlife in the shipment, as such data provide important information about trade. Specimens and/or data should be shared with species experts, including the IUCN SSC SPS SG, for analysis.
32. Parties should report seahorse seizures in their CITES IWT reports.
33. CITES should make identification guides for dried seahorses available in multiple languages. These can be based on existing identification tools for seahorses (<https://projectseahorse.org/resource-tag/id-guide/>).
34. CITES should explore use of DNA forensics and technology for seahorse species identification and monitoring trade flow.
35. CITES needs to work with its Parties to develop toolkits for training enforcement bodies (including frontline officers), prosecutors, judges, etc. in detecting and prosecuting IWT for the oft overlooked marine taxa such as seahorses.
36. Importing Parties should implement the Convention fully by requesting information on NDFs and LAFs when there are concerns about the validity of export permits.