

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

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Nineteenth meeting of the Conference of the Parties  
Panama City (Panama), 14 – 25 November 2022

AMENDMENT PROPOSAL FOR PROPOSAL 37. FAMILY CARCHARHINIDAE (54 SPECIES)

1. This information document is submitted by Japan in relation to CoP19 Proposal 37.\*

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\* *The geographical designations employed in this document do not imply the expression of any opinion whatsoever on the part of the CITES Secretariat (or the United Nations Environment Programme) concerning the legal status of any country, territory, or area, or concerning the delimitation of its frontiers or boundaries. The responsibility for the contents of the document rests exclusively with its author.*

**Amendment proposal for Proposal 37. Family Carcharhinidae (54 species)  
Japan**

**Amendment proposal**

1. Considering the rationales for amendment mentioned below, we propose excluding the following 35 so-called “look-alike” species from the Proposal 37 to reduce its scope in line with Rule 25.5 of Rules of Procedure of the Conference of the Parties.

Exclusion of the following genus and species from Proposal 37: Genus Carcharhinus, Genus Isogomphodon, Genus Loxodon, Genus Nasolamia, Genus Lamiopsis, Genus Negaprion, Genus Prionace, Genus Rhizoprionodon, Genus Scoliodon, Genus Triaenodon and any other putative species of family Carcharhinidae that don't satisfy Criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17).

**Rationales for the amendment**

2. The 7th FAO Expert Advisory Panel concluded that insufficient justification is presented for the proposed listing of the 35 “look-alike” species and expressed a serious concern that those listings would rather undermine the effectiveness of controls for species for which the listing to CITES Appendix II is justified (FAO 2022).

[Excerpts from the Report of the 7th FAO Expert Advisory Panel]

Comment on the likely effectiveness for conservation of a CITES Appendix II listing

[...]

*The proposal does not provide information on the impacts of CITES provisions on the remaining look-alike part of the family Carcharhinidae, a component that is over two times larger than species proposed for listing. Of particular importance in the look-alike species is the blue shark, a productive shark species that likely makes up around 90 percent of the shark fin market. The blue shark is subject to multiple management measures in different RFMOs, and its inclusion under provisions of CITES Appendix II would incur a large cost to management, fishers and markets that could produce a global socioeconomic impact. With regard to blue shark in particular, the Expert Panel received information from management and market authorities that strongly opposed the proposal's suggestion that there would be an issue of misidentifying blue shark and its products. The information provided included identification guides as well as qualifying information as to why blue shark fins are easy to differentiate from the other species (Europêche, 2022), also see Figure 14.*

[...]

*In summary, the Expert Panel stated that the extensive list of species in the proposal and included as “look-alikes” was largely insufficiently justified. Including so many new species in CITES Appendix II would place an unnecessary burden on existing monitoring capacity, resulting in a decrease in available capacity and resources for fishery management generally and the effectiveness of controls for species for which the listing is justified.*

3. Further to the insufficient justification and the likely reduction of control effectiveness, the 35 “look-alike” species include blue shark that is commercially harvested all over the world, assessed as abundant in stock by Regional Fisheries Management Organizations (RFMOs) and used under appropriate stock management. The proponent has a serious concern that, if this species is listed, a large number of CITES permits for blue shark would be issued thus the unnecessary paperwork and the enforcement burden would increase in all Parties, and that human and financial resources would be diverted from the conservation of the species that truly need to be protected and conserved.

4. Considering the evidence, the proponent believes that this proposal abuses the “look-alike” criteria because it proposes the listing of such a large number of species without sufficient grounds.

5. The abuse of “look-alike” criteria without sufficient justification can’t be accepted because it would cause not only damages to the conservation of endangered species, but also negative socioeconomic impacts, such as threats to food security, local economy and livelihood and sustainable fisheries development.

6. Reference materials are appended to this proposal.

### **Reference**

FAO (2022). Report of the 7th FAO expert advisory panel for the assessment of proposals to amend appendices I and II of CITES concerning commercially-exploited aquatic species. Rome, 18-22 July 2022. <https://www.fao.org/fishery/en/cites-fisheries/ExpertAdvisoryPanel#seventh>

Listing proposal of Carcharhinidae spp.  
(Requiem sharks including Blue shark)  
【Proposal No.37】



Blue Shark (*Prionace glauca*)

Fisheries Agency of Japan

## Japan's position: Requiem sharks proposal (Proposal No.37) should be rejected

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1. The FAO Expert Advisory Panel, which was established based on the Memorandum of Understanding between CITES and FAO, advised from scientific perspectives that most of 54 species proposed to be listed do not meet the CITES listing criteria.
2. In particular, the 35 “look-alike” species include blue shark that is commercially harvested all over the world, assessed as abundant in stock by Regional Fisheries Management Organizations (RFMOs) and used sustainably under appropriate stock management.

3. FAO Expert Advisory Panel concluded that the species can be readily differentiated from each other both at landing sites and in trade for the proposed 19 species from the 35 “look-alike” species. Inclusion of the 35 “look-alike” species doesn’t contribute to the conservation of the remaining 19 species.
4. The “look-alike” criteria are abused, consequently causing negative socioeconomic impacts, such as threats to food security, local economy and livelihood, and sustainable fisheries development.
5. In order to establish a consensus among member countries, Japan is considering the submission of an amendment proposal that the 35 “look-alike” species be deleted from Proposal 37 in accordance with Rule 25.5 of the Rules of Procedure of CoP.

# Ref 1. Listing proposals of aquatic species in CITES - COP19

Proposal NO.	Common name	Scientific name	proponents	Appendix	Note
37	Requiem sharks	Carcharhinidae spp.	Panama, EU, etc.	II	<b>54 species including Blue shark (Prionace glauca)</b>
38	Hammerhead sharks	Sphyrnidae spp.	EU, Brazil, etc.	II	6 species that are currently not listed
39	Freshwater stingray	Potamotrygon albimaculata	Brazil	II	7 species of ornamental fish
40	Guitarfish	Rhinobatidae spp.	Israel, etc.	II	37 species
41	Zebra pleco	Hypancistrus zebra	Brazil	I	Ornamental catfish
42	Sea cucumbers	Thelenota spp.	EU, US, etc.	II	3 species of tropical sea cucumber

# Ref 2. Stock status of Blue Shark



Blue Shark (*Prionace glauca*)

## Stock status

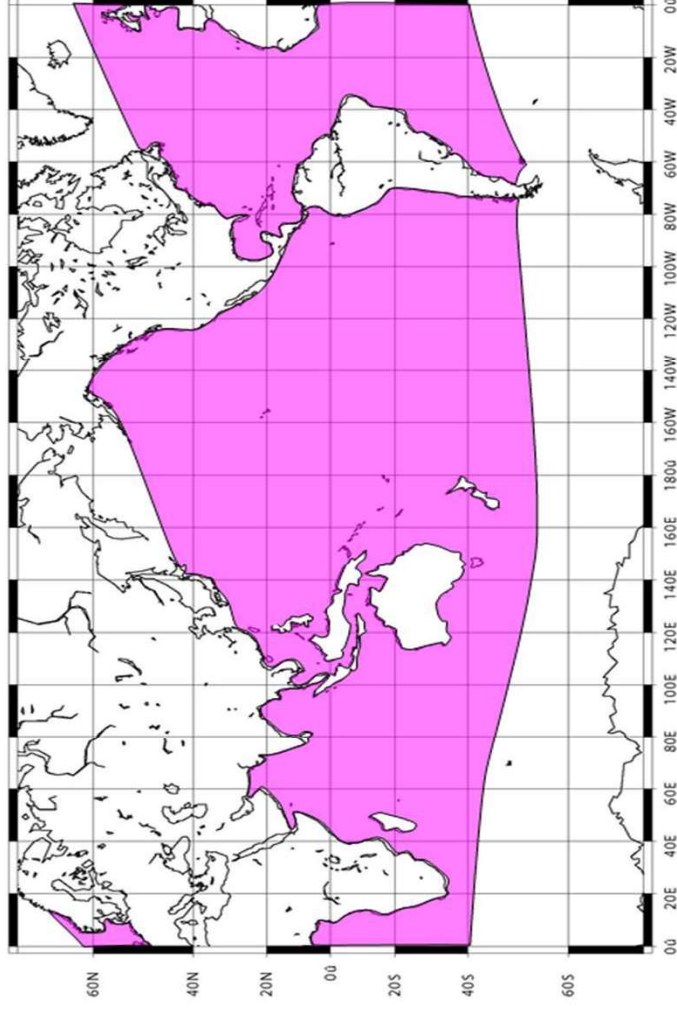
Management area	Year	Stock status*	Assessment institution
North/South Pacific	North:2022 South:2021	Good	North: ISC South: SPC/WCPFC
Indian Ocean	2021	Good	IOTC
North/South Atlantic	2015	North : Good South : Under investigation (increasing trend)	ICCAT

\*Note: “Good” denotes the latest stock status is not likely overfished and overfishing is not likely occurred, given the MSY-based reference points.



# Ref 3. Management of Blue Shark

## ➤ Habitat



- Management by Regional Fisheries Management Organizations (RFMOs) such as ICCAT
  - 【ICCAT】
    - 52 Contracting Parties including Japan
    - North Atlantic
      - Total Allowable Catch (TAC) : 39,102 t
      - Maximum catch limit for contracting parties
    - South Atlantic
      - Total Allowable Catch (TAC) : 28,923 t

Ref 4. The catch records of Blue shark in oceans

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- Around 100,000 tons of Blue shark are sustainably harvested annually in more than 60 countries worldwide.
- In other words, Blue sharks are not an endangered species, but a fisheries target species that can be sustainably used.

## Ref 5. Scientific Advice of FAO Expert Advisory Panel

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### 【●Proposal No.37: Requiem Sharks (54 species)】

- 19 species out of Family Requiem Sharks (*Carcharhinidae*)
  - 3 species meet the decline criteria
  - 12 species don't meet the decline criteria
  - 4 species have insufficient data
- Other remaining 35 species (including blue shark)
  - All the 35 species, including blue shark, don't meet the “look-alike” criteria