

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



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UPDATE ON CITES IMPLEMENTATION FOR HUMPHEAD (NAPOLEON) WRASSE,
CHEILINUS UNDULATUS, 25 SEPTEMBER 2018

This document is submitted by the Secretariat on behalf of the IUCN SSC Grouper & Wrasse Specialist Group in relation to agenda item 47.*

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Update on CITES implementation for Humphead (Napoleon) Wrasse, *Cheilinus undulatus*

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The following brief summary reports on the progress and remaining challenges since CoP17 and SC69 in relation to the implementation of the CITES Appendix II listing of Humphead (Napoleon) Wrasse (HHW) by the major trading Parties, Indonesia (major exporter) and China/Hong Kong (major importer). In particular we address potential actions to support major exporting and importing countries to address remaining implementation challenges and ensure well-regulated sustainable trade of the species. **Possible solutions are indicated in bold font.**

The principle implementation challenges are as follows:

1. Prior to 2018 all trade in HHW was reported with the source code 'W' (wild-sourced). In 2018, shipments of HHW from Indonesia (from Anambas/Natuna Islands only) were reported using source code 'R' (ranching). This has introduced an enforcement challenge because it is not possible to reliably distinguish 'R' from 'W' fish exported from Indonesia once they arrive in Hong Kong. Since it is known that 'W' fish are still being illegally exported from Indonesia and volumes of 'R' fish are quite large, there is a real possibility for laundering of 'W' fish as 'R' fish after arriving in Hong Kong. While the NDF* suggests that fishers can distinguish ranching fish as paler and less aggressive, among other characteristics (p. 18 of the NDF under 'Traceability'), these features are not practical enough to be used by law enforcement officers in Hong Kong to distinguish 'R' from 'W' fish for enforcement purposes. **'R' fish need to be tagged in source country to enable importing countries to distinguish between 'R' and 'W' fish.**

2. Moreover, the NDF* for 'R' HHW does not demonstrate that removal of post-larvae/small juveniles for grow-out is non-detrimental or that there are conservation benefits from ranching (such as releases of some fish for population recovery). It is assumed that removing small fish (post-larvae/juveniles) at days to weeks old from their algal bed nurseries will not affect wild populations and that these are, to all intents and purposes, infinite. However, there are no data to support this assumption and the wild populations in the area of these islands have long been much depleted and show no indications of recovery. In sum, the potential biological impacts on the wild population of taking unknown/uncontrolled numbers of small post-larval fish and juveniles of weeks old are unknown. Given that natural mortality declines very rapidly post-settlement, it is very likely that many of the juveniles taken for 'R' ranching activities could have survived if left in the wild. There are no studies to show what the sustainable levels of post-larval offtake should be. While some areas have been closed to fishing of post-larvae, it is not known what the conservation outcomes, if any, of these closures are. Information is also needed on mortality levels at capture and during grow-out, which can last for up to 5 years. **Research is needed in Anambas/Natuna to ensure a valid NDF for 'R' fish that addresses conservation considerations; for example, some of the reared fish could be released in local waters. This situation highlights a very serious problem with the definition and application of the 'R' category for juvenile grow-out in fishes.**
3. In CITES Notification No. 2018/022**, Indonesia has specified that transportation by sea is only permitted for 'R' fish of a specific size range (1000-3000g). However, many of the 'R' fish arriving by sea in Hong Kong this year were visually estimated by researchers to be below 1000g in size. It is also unclear in the Notification whether transport of 'R' fish by air is permitted. Air access is not currently possible for Anambas (the sole source of 'R' fish), however imports of 'R' fish to Hong Kong by air have been reported. **To assist importing countries to check the validity of 'R' imports, it is recommended that Indonesia clarify the mode(s) of transport and size range permitted for 'R' fish and that this be specified on the export permits.**

**NDF for HHW in Anambas/Natuna 2016 – LIPI – Indonesian Institute of Sciences.*

*** CITES Notification No. 2018/022 27 February 2018 - INDONESIA - Transportation mode of Napoleon Fish (Cheilinus undulatus) export from Indonesia*