

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



Fifteenth meeting of the Conference of the Parties
Doha (Qatar), 13-25 March 2010

Interpretation and implementation of the Convention

Species trade and conservation issues

HUMPHEAD WRASSE, ADDITIONAL MANAGEMENT MEASURES NEEDED TO COMBAT IUU FISHING

1. This document has been submitted by Indonesia*.
2. Illegal, Unregulated and Unreported (IUU) fishing threatens not only the Humphead Wrasse (hereafter also referred to as HHW), but also marine ecosystems (for example from cyanide use to catch fish) as well as the livelihoods of coastal communities.
3. As a multilateral treaty aimed at ensuring that international trade does not threaten the survival of wild animals and plants, CITES has the potential to become a valuable tool among broader efforts to curb IUU HHW fishing. CITES can, and should, complement more traditional fisheries management approaches and, taken together, its Appendix II could move HHW fisheries towards being a sustainable industry.
4. Already, Malaysia and Indonesia, the major exporters of Humphead Wrasse, have expended considerable effort in developing scientifically based export quotas for HHW which demonstrate a Non-Detriment Finding (NDF). Species identification training and workshops on the Humphead Wrasse have been carried out in Indonesia, and in Guangdong and Hong Kong, China. In addition, a number of workshops, both national and international, have been held since 2004, and field studies conducted to collect data relevant to NDF. Meetings have been held to discuss implementation of HHW policies. The major importer of HHW, Hong Kong, is committed to controlling imports, re-exports and possession within the territory, thus enabling a more secure system of trade. Collaborations and/or funding involving IUCN, the CITES Secretariat, FAO, and TRAFFIC have variously assisted in the above work. The outcomes of these efforts are being considerably undermined by IUU of the HHW in international trade between the major traders of the species.

Major issues undermining the CITES Appendix II listing in relation to IUU

5. *IUU by foreign vessels and illegal movements by sea out of Malaysia, Indonesia and the Philippines and into Hong Kong.*

International movements by sea of Humphead Wrasse that are IUU have been reported coming out of major exporting countries Malaysia and Indonesia, and also out of the Philippines, and appear to be a significant part of the trade. This is the most pressing IUU issue with the Humphead Wrasse. The CITES Management Authority of Hong Kong, the major importer of this species globally, faces major challenges with inbound sea shipments due to the concealment of HHW within boats, HHW being mixed with other fish during transportation, the large volume of marine traffic in Hong Kong waters and the multiple times and places that live fish are landed by vessels around the city; these conditions make imports by sea extremely challenging to monitor. Moreover, import by sea to mainland China, the other major importer is

* *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.*

undocumented. Several high profile cases of poaching by foreign vessels in the Philippines documented IUU of Humphead Wrasse.

In order to bring the international trade by sea under tighter control, Indonesia has introduced an air-only rule for exporting the species from Indonesia. If this rule were adopted by all exporting countries trading the species internationally, the IUU by sea could be considerably tightened. International trade by air is commonly practiced by many countries trading the HHW and is a feasible and practical mode of transport for the species. By permitting air-only international movements, enforcement of the Appendix II listing for the Humphead Wrasse could be greatly improved.

6. *Major discrepancies in international trade records of Humphead Wrasse have been detected, indicating that, despite ongoing efforts to ensure that trade is documented, improvements are needed to improve enforcement capability. There are three particular areas that need attention.*
 - 1) Mainland China is a major consuming region for Humphead Wrasse and fish have been seen on sale in shops; there are no records reported to CITES of imports into mainland China. Therefore, there appears to be no authorization for importation of Humphead Wrasse.
 - 2) Singapore is a re-exporter of Humphead Wrasses which have their origins mainly in Indonesia and Malaysia waters, possibly elsewhere. This species does not come from Singapore waters because the species is depleted in Singapore waters. Therefore any records of Humphead Wrasse exported from Singapore should appear as re-exports and indicate the source country. Hong Kong's import records for 2005 and 2006 show significant Humphead Wrasse volumes coming from Singapore as 'exports' rather than 're-exports', i.e. with no indication of the country of origin. Officials of the Wildlife Regulatory Branch, Agri-Food and Veterinary Authority of Singapore indicate that they did not issue any re-export permits for Humphead Wrasse to Hong Kong in 2005 and 2006, and none were reported to CITES.
 - 3) Humphead wrasse are being included in mixed fish shipments being traded internationally by air, as detected on multiple occasions by customs officials at Hong Kong airport. Inspections of live fish consignments need to be checked more vigorously at ports of export, and customs officials could benefit by training in species identification.
7. *The handling of live confiscated fish is a major challenge for importing Management Authorities who have not had to handle this issue in the past and do not have existing facilities that are appropriate.*

When illegal consignments of Humphead Wrasse are detected or suspected there is a need to store seized live fish either temporarily, while the case is investigated, or in the long-term if live fish are confiscated permanently. This is a major challenge for importing Parties. There is little support for returning fish to source countries and release is not considered to be advisable. While enquiries are actively being made internationally to locate aquaria to house the fish, there is still no solution to this challenge.

Indonesia recommend that Parties adopt a Conference Resolution in respect of the following actions, as identified during the June 2009 international workshop on the Humphead Wrasse in Hong Kong attended by all major trading countries.

8. Limit international trade to be conducted by air only, considering many loopholes that will inevitably cause uncontrolled shipping by sea even through designated ports at specified time.
9. Improve monitoring of trade by both exporting and importing/re-exporting countries. For example, inspections of export/re-export shipments to check for HHW in boxes of mixed live fish and inspections in retail and wholesale outlets in importing countries.
10. Encourage regular exchanges and rapid feedback among trading Parties, including for law enforcement information, and regularly compile and distribute a comprehensive summary of Convention violations for the species.
11. Increase awareness of the CITES listing for Humphead Wrasse, including improved identification capacity among law enforcement officers by training and educational materials.
12. Discuss the options for action that are acceptable and practical to be taken in the case of illegally imported/confiscated live fish.

13. Convene a workshop to discuss the IUU issues identified and the problems raised in this document.

COMMENTS FROM THE SECRETARIAT

- A. Whilst the Secretariat appreciates Indonesia's desire to improve regulation of the trade in *Cheilinus undulatus* and combat illegal, unreported and unregulated fishing of this species, it is unable to support the proposal in their current form.
- B. It appears that many of the Parties affected by the issues connected to trade in this species came together to agree actions as recently as June 2009. During the 58th meeting of the Standing Committee (Geneva, July 2009), the Secretariat met with IUCN to discuss concerns regarding this species. The Secretariat subsequently wrote to relevant Parties, providing a briefing document prepared by IUCN and TRAFFIC and encouraging them to implement the actions that had been agreed at the June 2009 workshop referred to in Indonesia's document. The Secretariat suggested that these Parties be prepared for discussions on this subject at the present meeting.
- C. The Secretariat suggests, therefore, that the outcome of such discussions be awaited. Thereafter, it will readily assist Indonesia, and others, in drafting any appropriate decisions that the Conference may agree upon. It believes, however, that a Resolution devoted to this species is probably not warranted at this time.
- D. The Conference may also wish to note that document CoP15 Doc. 10.2 on Cooperation with the Food and Agriculture Organization of the United Nations describes that FAO is planning to publish a Fisheries Circular in early 2010 which will contain technical guidelines for monitoring and managing live reef fisheries, targeting humphead wrasse. This material should assist Indonesia and other Parties in their efforts to improve regulation of trade in humphead wrasse.

DRAFT RESOLUTION OF THE CONFERENCE OF PARTIES

Conservation of and trade in Humphead Wrasse (*Cheilinus undulatus*)

RECALLING that the Conference of the Parties to the Convention, at its thirteenth meeting, listed the Humphead Wrasse *Cheilinus undulatus* on Appendix II of the Convention;

AWARE that the Humphead Wrasse plays a key role in coral reef ecosystems;

FURTHER AWARE that the species is vulnerable to overfishing by virtue of its longevity and low productivity;

FURTHER AWARE that, if sustainably managed, the species can represent an important contribution to the livelihoods of communities that live in proximity to coral reefs where it occurs;

ACKNOWLEDGING the progress that has been made by Indonesia and Malaysia in the making of non-detriment findings when exporting specimens of Humphead Wrasse;

CONCERNED that this progress could be undermined by illegal, unregulated and unreported (IUU) fishing and illegal movements of specimens of the species out of the territorial waters of Indonesia, Malaysia (and the Philippines);

MINDFUL that major discrepancies in international trade records of Humphead Wrasse have been detected, indicating that, despite ongoing efforts to ensure that trade is documented, improvements are needed to improve enforcement capability;

AWARE that the handling of live confiscated fish is a major challenge for importing Management Authorities who have not had to address this issue in the past and do not have existing facilities that are appropriate;

MINDFUL of the fact that much international trade in Humphead Wrasse is already conducted by air and that the points of exit and entry by air are very limited compared to sea transport options.;

THE CONFERENCE OF THE PARTIES TO THE CONVENTION

URGES all Parties to:

- a) Limit international trade to be conducted by air only, in order to improved control and enforcement of the Appendix II Listing for Humphead Wrasse.
- b) Improve monitoring of trade especially through inspections of boxes of mixed live reef fish by both exporting and importing/re-exporting countries;
- c) Exchange law enforcement information of relevance to Humphead Wrasse, and regularly compile and distribute a comprehensive summary of Convention violations for the species; by establishing CITES Humphead Wrasse Task Force.
- d) Increase awareness of the CITES listing for Humphead Wrasse, including improved identification capacity among law enforcement officers by training and educational materials;
- e) Facilitate discussion on the options for action that are acceptable and practical to be taken in the case of illegally imported/confiscated live fish;

DIRECTS the Secretariat to:

- a) assist in the capacity-building activities outlined at (e) above; and
- b) provide assistance or advice to address the handling of live confiscated Humphead Wrasse.