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

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

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This document has been submitted by the IUCN SSC Groupers & Wrasses Specialist Group to provide an update on progress in implementation of the Appendix II listing of humphead wrasse (*Cheilinus undulatus*) and Decisions 15.87 (Rev. CoP17), 16.139 to 16.140 (Rev. CoP17), and 17.201 to 17.202. **Possible solutions are indicated in underlined bold font.**

1. **Progress has been made by major trading Parties towards control of trade in humphead wrasse since its CITES listing.** In addition, much has been learned and published on the species as a result of increased attention following the species' listing, information that substantially increases our understanding of the species, its trade and sustainable use.

In Hong Kong, SAR (the major import hub), improved government enforcement efforts have resulted in increased numbers of prosecutions and a two-thirds reduction in illegal retail trade. A photo identification method for mobile phone use is being trialled to detect fish laundering within Hong Kong, SAR (i.e. after import) (Hau and Sadovy de Mitcheson, in press). In mainland China, as of 2018, humphead wrasse is categorised as a Class II threatened species.

In Indonesia, the major exporter, a scientifically-based NDF was developed for wild-caught fish and an annual export quota successfully introduced. Subsequently, a decade-long study has shown that while numbers and sizes of fish remain much reduced in areas of high fishing pressure (where adults are largely absent), low pressure areas are either stable, or where fishing stopped there are encouraging signs of recovery (Sadovy de Mitcheson *et al.*, 2019). Nevertheless, **there is a need to reduce levels of fishing in medium to heavily fished areas.**

2. **Two challenges to enforcement remain.** The first is that the species is not reported when exported from the Philippines and is rarely reported entering mainland China. For example, a shipment of 8,000 fish in late 2017 from Indonesia that was reported to be destined for Hong Kong, SAR did not arrive in the city and almost certainly went to mainland China. Many humphead wrasse are regularly seen on sale in

mainland China and most are imported, according to traders, but do not appear in the CITES Trade Database. **This trade needs to be reported.**

The second immediate challenge to enforcement is the recently introduced 'R' (ranching) source code for this species and the lack of specificity in current or pending¹ CITES guidance regarding ranching fish (see also next paragraph). Prior to 2018 all trade in humphead wrasse was reported with the source code 'W' (wild-sourced). In 2018, shipments of the species from Indonesia (from Anambas/Natuna Islands only) were reported using source code 'R'. This has introduced an enforcement challenge as it is not possible to distinguish 'R' from 'W' fish because neither type of fish is tagged. Since it is known that 'W' fish are still being illegally exported from Indonesia, that volumes of 'R' fish are relatively large (export quota of 40,000 'R' fish annually compared with <2000 'W' fish annually), and that 'W' fish are sometimes laundered as 'R' fish, **there is a clear need to tag these preliminarily classified 'R' fish prior to export.**

However, a more fundamental issue is that the 'R' fish are still wild-caught so it is not clear how they actually differ from 'W' fish, if they are not tagged and given that there is no scientifically based NDF and that ranching does not demonstrably contribute to the conservation of the species. The ranching activity depends on the capture of large numbers of small post-larval fish from the wild and yet there is no information on natural mortality, or on mortality during grow-out, to justify the biological sustainability of the current 'R' quota of 40,000 fish, which could well be placing further pressure on the species. **These specimens do not appear to qualify for labelling as source code 'R' and should be labelled source code 'W', and a scientifically-based NDF for the export of these fish is needed.**

CITES Notification No. 2018/022 from Indonesia 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, SAR this year were visually estimated by researchers to be below 1000g in size. It is also unclear 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, SAR 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 export permits.**

- 3. In addition, there are multiple opportunities for increased information exchange between the main Parties involved in the trade of this species on air and sea shipments, which could help to improve enforcement.**

REFERENCES

Hau, CY & Sadovy de Mitcheson, Y (in press). A facial recognition tool and legislative changes for improved enforcement of the CITES Appendix II listing of the humphead wrasse, *Cheilinus undulatus*. Aquatic Conserv: Mar Freshw Ecosyst.

Sadovy de Mitcheson Y, Suharti S, & Colin PL. (2019). Quantifying the rare: Baselines for the endangered Napoleon Wrasse, *Cheilinus undulatus*, and implications for conservation. Aquatic Conserv: Mar Freshw Ecosyst. 29(8): 1285-1301.

<https://doi.org/10.1002/aqc.3124>

¹ [CoP18 Doc. 57 Implementation of the Convention relating to captive-bred and ranching specimens](#)