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IMPLEMENTATION OF THE CMS APPENDIX I-LISTING FOR THE OCEANIC WHITETIP SHARK - ASSESSMENT OF ADDITIONAL DATA ON INTERNATIONAL TRADE AND FISHERIES

(Prepared by the Secretariat)

Summary:

This document contains an analysis of additional data on international trade and fisheries regarding the Implementation of the Appendix I-Listing for the oceanic whitetip shark (*Carcharhinus longimanus*), to complement the information submitted by Parties in UNEP/CMS/COP15/Inf.25.6.3g in accordance with the instruction from StC56.

IMPLEMENTATION OF THE CMS APPENDIX I-LISTING FOR THE OCEANIC WHITETIP SHARK - ASSESSMENT OF ADDITIONAL DATA ON INTERNATIONAL TRADE AND FISHERIES

(June 2025)

1. Following instructions from the 56th Standing Committee Meeting, the CMS Secretariat reviewed available international trade, and fisheries catch data on the oceanic whitetip shark (Carcharhinus longimanus) to assess potential non-compliance with Article III (5) of the Convention, which prohibits "taking" Appendix I species except under limited exceptions.

Assessment of data on international trade in oceanic whitetip shark (*Carcharhinus longimanus*)

Methodology

For the analysis of data on international trade in *C. longimanus*, data for 2021-2023 involving this species were downloaded from the CITES Trade Database[1] using the 'Comparative Tabulation' option on the webpage. This option matches records with identical details reported by both exporting and importing countries to prevent duplicates in the CITES database. In comparative tabulation reports, records are aggregated when the taxon, term, importer, exporter, country of origin, purpose, source, and year are identical. When both parties report these details identically, the shipments are combined on one line and their quantities are summed. In the context of this document, the term transaction may therefore represent multiple underlying transactions due to this aggregation of similar entries.

2. For the purpose of the present analysis, CITES trade transactions meeting the following criteria were included in the analysis:

a) **The 'source'** of species or specimens traded:

Only specimens taken from the wild, including from the marine environment not under the jurisdiction of any State would be covered by Article III (5). Therefore, the transactions that were considered for this analysis included the following source codes:

W: Specimens taken from the wild
X: Specimens taken in "the marine environment not under the jurisdiction of any State"

b) **The 'purpose'** of the recorded transaction:

The analysis considers only transactions with purpose codes that are not included as exceptions in Art III (5) for taking of Appendix I listed species[2]. The purpose codes that were considered are the following:

T: Commercial

[1] CITES trade statistics derived from the CITES Trade Database (https://trade.cites.org/), UNEP World Conservation Monitoring Centre, Cambridge, UK.
[2] Transactions with 'Breeding in Captivity', 'Educational', 'Law Enforcement/Judicial/Forensic', 'Medical (including biomedical research)', 'Reintroduction/Introduction into the Wild', 'Scientific' or with blank spaces as purpose codes were removed from this analysis.

Transactions involving purpose codes that may be in accordance with exceptions under Article III (5) were excluded (M – Medical, B – Breeding in captivity, E – Educational, L – Law enforcement, N – Reintroduction or Introduction into the wild). Transactions involving purpose codes for H – Hunting trophy, P – Personal, Q – Circus or travelling exhibition, and Z – Zoo, were not recorded.

3. As the exact date of the transaction is not recorded in the CITES trade database, only those transactions were considered where the *C. longimanus* was listed in CMS Appendix I at least during the year before the transaction. As the listing came into force in 2020, only data from 2021 - 2023 were used. Data for 2024 onwards were not available at the time of preparing this analysis.

4. The results include only those transactions where at least one CMS Party was involved either as importer, exporter, or country of origin. A country was considered a Party from the first year after accession to the Convention onwards.

5. The number of recorded transactions that involved *C. longimanus* listed species between 2021 and 2023 which meet the criteria as described above are presented in **table 1**.

Results

6. Analysis of CITES Trade Database records from 2021 to 2023 indicates that eight CMS Parties, Benin, Ghana, Kenya, Senegal, Seychelles, Sri Lanka, the United Arab Emirates, and Yemen, were involved in international trade of C. longimanus, acting either as exporting or origin countries.

7. Primary destinations included China, Hong Kong (China), and Singapore. The majority of trade involved fins, either dried or fresh and in two instances, shark skins and whole specimens. Overall traded volumes amounted to 19.540,64 kg wet fins, 8.372,1 kg of dried fins, 463,8 kg of shark skin and 18 specimens were traded internationallywith individual shipments ranging from under 36 kg to nearly 12,000 kg. All reported transactions were for commercial purposes (purpose code T), and most specimens were sourced from the wild (source code W), with shipments listed as specimen taken from “the marine environment not under the jurisdiction of any State” (source code X), indicating capture beyond national jurisdiction.

Detailed analysis by Parties

8. In 2021, Benin exported 18 specimens of Carcharhinus longimanus to Ghana. The trade was reported for commercial purposes (purpose code T) and the source was identified as wild (source code W). While the absolute volume is small, the involvement of both Benin and Ghana, each of which is a CMS Party and Signatory to the Sharks MOU. Although the volume does not in itself raise immediate conservation concerns, the transaction indicates that the species continues to enter international trade routes even in low-volume form.

9. Ghana, in the same transaction mentioned above, acted as the importing country. While it is not an exporter in this dataset, it has a role as a trading partner to another CMS Party and Signatory (Benin). The Secretariat notes that there are no further records of Ghana’s involvement in trade of *C. longimanus* during the 2021-2023 period.

10. Kenya is an exporter in 2021, with transactions directed to China (315 kg of fins) and to Hong Kong (China) (35.94 kg of fins) in both cases for commercial purposes, concerning specimens of wild origin.

Table 1: Recorded aggregated trade transaction between 2021 – 2023 in oceanic whitetip shark (*Carcharhinus longimanus*) with involvement of CMS Parties and/or Signatories of the CMS Memorandum of Understanding on the Conservation of Migratory Sharks (Sharks MOU).
Purpose codes: T = Commercial; **Source codes**: **W** = Wild, **X**= Specimens taken in "the marine environment not under the jurisdiction of any State"); **Colour code:** CMS Party
Source: CITES Trade database: download 17 June 2025

Year	Importer	Exporter	Origin	Importer reported quantity	Exporter reported quantity	Term	Unit	Purpose	Source
2021	China	Kenya			315	fins	kg	T	W
2021	China	Senegal	Introduction from the sea		674.4	fins	kg	T	X
2021	Ghana	Benin			18	specimens	specimens	T	W
2021	Hong Kong (China)	Kenya	Unknown	35.94		fins	kg	T	W
2021	Hong Kong (China)	Singapore	Sri Lanka		149.3	fins	kg	T	W
2021	Hong Kong (China)	Senegal		270		fins	kg	T	W
2021	Hong Kong (China)	Yemen		2899.3	11835.85	fins	kg	T	W
2022	China	Singapore	Yemen		54.3	fins	kg	T	W
2022	China	Senegal	Introduction from the sea		1758.2	fin (dried)	kg	T	X
2022	Hong Kong (China)	United Arab Emirates	Yemen	130		fin (dried)	kg	T	W
2022	Hong Kong (China)	Seychelles		123		fin (dried)	kg	T	W
2022	Hong Kong (China)	Senegal		700		fin (dried)	kg	T	W
2022	Hong Kong (China)	Yemen		1525.6		fin (dried)	kg	T	W
2022	Hong Kong (China)	Yemen			5322.1	fins	kg	T	W
2022	Singapore	Yemen			455	fins	kg	T	W
2023	China	Senegal			1003	fin (dried)	kg	T	W
2023	Hong Kong (China)	Seychelles		76.2		fin (dried)	kg	T	W
2023	Hong Kong (China)	Senegal		97		fin (dried)	kg	T	W
2023	Hong Kong (China)	Yemen		2959.1		fin (dried)	kg	T	W
2023	Hong Kong (China)	Yemen		463.8		skins	kg	T	W
2023	Singapore	Yemen		428.75		fins	kg	T	W

11. Senegal is one of the most active exporters of *C. longimanus* during the reporting period. Export transactions were recorded in all three years (2021-2023) with one trade per year with the primary trade partners China and Hong Kong SAR. In 2021 and 2022, Senegal reported exports of 674.4 kg of fins and 1,758.2 kg of dried fins, both declared as originating from "Introduction from the sea" (source code X) to China. An additional 1003 kg of wild-caught fins (dried) were exported in 2023 to China. Between 2021 to 2023 270 kg fins and 797 kg fins (dried) were exported to Hong Kong SAR.

12. In 2021, Sri Lanka was identified as the country of origin for 149.3 kg of fins exported from Singapore to Hong Kong (China) for commercial purposes, involving wild-caught specimens. Although Sri Lanka was not the exporting State, its designation as the source country warrants attention.

13. Seychelles was an exporter in 2022 and 2023, with transactions totalling approximately 199.2 kg of dried fins exported to Hong Kong (China). The trade was identified as commercial, and the source was wild caught. Although the volume is modest relative to other exporters, the repeated nature of the trade indicates sustained international commercial activity.

14. The United Arab Emirates (UAE) appears in the 2022 data as an exporter of 130 kg of Yemeni-origin dried fins to Hong Kong (China). The specimens were wild-caught and traded for commercial purposes.

15. Among CMS Parties, Yemen is the most prolific exporter in the dataset, trading large volumes of shark fins and skins to multiple destinations over three consecutive years. In 2021, it reported exports totaling 11,835.85 kg of fins to Hong Kong (China). During 2022 and 2023, exports continued, including 4,484.7 kg of dried fins and 6,205.85 kg of fins sent mainly to Hong Kong (China) and Singapore, as well as 463.8 kg of shark skins shipped to the former in 2023. All shipments were declared as commercial and sourced from the wild. Yemen also appeared as the country of origin in two 2022 records: 54.3 kg of fins traded via Singapore to China, and 130 kg of dried fins traded via the United Arab Emirates to Hong Kong (China).

Assessment of fisheries data for oceanic whitetip shark (*Carcharhinus longimanus*)

16. The Secretariat requested the assistance of the Regional Fisheries Management Organizations (RFMOs) in providing data on catches, discards, releases, and landings reported by the members states of the RFMO for *C. longimanus* for the period 2021-2023 on the 1st of May 2025. Responses were received from the Inter-American Tropical Tuna Commission (IATTC), International Commission for the Conservation of Atlantic Tunas (ICCAT) and Indian Ocean Tuna Commission (IOTC).

17. In additon the Secretariat analysed the FAO data records which were obtained from the "Report of the Meeting" of the "4th Meeting of the Advisory Committee (AC4)".

Inter-American Tropical Tuna Commission (IATTC)

18. Data has been received from IATCC. On their website (https://www.iattc.org) it is possible to download the "Shark EPO purse seine catch and effort aggregated by year, month, flag or set type". No *C. longimanus* catches have been reported between 2021 to 2023.

International Commission for the Conservation of Atlantic Tunas (ICCAT)

19. ICCAT reported that they limited observer data, which is confidential and therefore can only provide a summary of catches by year, but not by the origin, exporting or importing country. Therefore, for the purpose of identifying of CMS Parties and/or Shark MOU Signatories involved in taking *C. longimanus* that data could not be used.

Indian Ocean Tuna Commission (IOTC)

20. The IOTC Secretariat provided a comprehensive data set covering the years 2021-2023 containing:

- retained catch: data reported as landed by fishing vessels; main sources are logbook and port sampling;
- discarded catch: data reported as discarded during fishing operations; main sources logbook and observer onboard vessels;
- observer data: data extracted from observer's reports.

21. Additionally, the IOTC Secretariat noted that catches for discard and observer are not raised to total catch, with the observer coverage minimum requirement set at 5%. Hence, it might not represent the total catch of *C. longimanus* from the respective fleet/annually.

Table 2: Retained catches of *C. longimanus* by CMS Parties as reported to IOTC.

Fleet	**Year**	**Gear**	**Retained Catch** (metric tonnes (rounded, except <1 MT))
France (EU)	2021	Hand line and Troll line	0,11
Iran, Islamic Republic	2021	Gillnet	3
	2021	Offshore gillnet	15
	2022	Gillnet	5
	2022	Offshore gillnet	27
	2023	Gillnet	1
	2023	Offshore gillnet	9
	2023	Troll line	0,21
Mozambique	2023	Gillnet	19
Seychelles	2021	Longline Fresh	0,02
	2022	Purse seine	0,85
	2023	Purse seine	0,57

Table 3: Observer data relevant to *C. longimanus* for CMS Parties as reported to IOTC (Data on discards were excluded).

Fleet	**Year**	**Fishery**	**Fate**	**Condition type**	**Number of interactions**
EU (France)	2021	Longline | Deep-freezing	Retained	Dead	1
				Unknown	8

Food and Agriculture Organization (FAO)

Table 4: Reported landings by CMS Parties of *C. longimanus* as reported to FAO for the period 2021 to 2022 by FAO Major Fishing Area, country and year. Blank cells indicate no

landings were reported. **Unit:** MT = metric tonnes (rounded). **Source:** Report of the Meeting of the 4th Meeting of the Advisory Committee (AC4).

Country	Year	FAO Area	Landings (metric tonnes)
Iran	2021	51 Indian Ocean, Western	18
	2022		32
Fiji	2021	71 Pacific, Western Central	150
	2022		93
French Polynesia	2021	77 Pacific, Eastern Central	259
	2022		197
Samoa	2021	77 Pacific, Eastern Central	1
	2022		2

22. Table 4 shows that, during 2021 and 2022, the majority of C. longimanus landings reported by CMS Parties were concentrated in the Western and Central Pacific region, with French Polynesia and Fiji accounting for 456 metric tonnes and 243 metric tonnes, respectively. In the Indian Ocean, Iran reported total landings of 41 metric tonnes across both years.

Discussion

23. This analysis indicates that between 2021 and 2023 international trade in oceanic whitetip shark products by CMS Parties remained active. Transactions involving more than 22,000 kg, predominantly fins, were recorded from CMS Parties, with exports directed to markets such as China, Hong Kong, and Singapore. Most specimens were sourced from the wild (code W) or taken from areas beyond national jurisdiction (code X), showing that CMS Parties continue to commercially exploit the species both within and outside their waters.

24. Several CMS Parties acted as exporters. Yemen supplied large volumes of fins and skins across the three-year period. Other CMS Parties identified as exporters or origin countries included Senegal, Seychelles, Benin, Kenya, Sri Lanka, and the United Arab Emirates. The involvement of multiple CMS Parties demonstrates sustained participation in the international trade of *C. longimanus* products despite the species' Appendix I-listing.

25. Catch and landings data reported by CMS Parties reinforce these findings. FAO records for 2021–2022 show substantial landings by CMS Parties, particularly in the Pacific, where French Polynesia and Fiji together reported landings of 699 metric tonnes. In the Indian Ocean, Iran reported an additional 41 metric tonnes. Data from Regional Fisheries Management Organizations (RFMOs) provide further evidence: the Indian Ocean Tuna Commission (IOTC) reported retained catches by CMS Parties (France (EU), Iran, Islamic Republic, Mozambique, and Seychelles) using various gear types, including dead specimens recorded by observers. The Inter-American Tropical Tuna Commission (IATTC) reported no catches by CMS Parties, while ICCAT data were confidential and insufficient for Party-specific assessment.

26. Taken together, these results highlight concerns regarding the status of implementation of the Appendix I-listing of *C. longimanus*. CMS Article III (5) prohibits the taking of

Appendix I-listed species, including the oceanic whitetip shark. Yet the documented scale and continuity of trade and catches by CMS Parties point to significant gaps in implementation. Although this analysis does not cover non-Parties, the findings clearly demonstrate that within CMS membership, *C. longimanus* continues to be exploited and traded on a considerable scale, with the potential of undermining the objectives of the Convention.