



21 July, 2022

To: Adam Burns  
Acting Assistant Deputy Minister  
Fisheries and Oceans Canada  
By email: adam.burns@dfo-mpo.gc.ca

Dear Adam,

We are writing to urge Canada to support strong, science-based proposals to include additional shark species on Appendix II at this year's 19<sup>th</sup> meeting of the Conference of the Parties (CoP19) of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Species listing proposals for consideration at CoP19 this November can be found on the CITES website [here](#).

The Government of Panama is leading a proposal to list the entire family of **requiem sharks** (Family Carcharhinidae) on CITES Appendix II. The EU Commission is leading a proposal to list all species of **hammerhead sharks** (Sphyrinidae spp.) that are not already listed, in Appendix II. Finally, Israel is leading a proposal to list all species of **guitarfishes** (Rhinobatidae spp.) on Appendix II. The fact that all three of these proposals are family-level listings speaks to the urgency of protecting sharks and rays from unsustainable international trade as well as the reduction in the enforcement burden that family-level listings offer. **We urge Canada to support these proposals.**

Canada has already emerged as a global shark leader in recent years. In 2019, Canada adopted world-leading [measures](#) that prohibit the trade in detached shark fins. In 2021 at ICCAT, Canada helped lead the charge to ban the retention of North Atlantic shortfin mako shark (*Isurus oxyrinchus*) (which is on CITES Appendix II). Further, at the 2021 NAFO meeting, Canada also supported a proposal to ban the retention of the Greenland shark (*Somniosus microcephalus*).

The mandate letter for the Minister of Fisheries and Oceans and the Canadian Coast Guard directs DFO to work together with Environment and Climate Change Canada to “halt and reverse nature loss by 2030 in Canada, achieve a full recovery for nature by 2050 and champion this goal internationally.”

Supporting the aforementioned science-based proposals to include shark species on Appendix II can help achieve this objective by elevating Canada's leadership on shark conservation and slowing the decline of vulnerable shark and ray populations through CITES listing.

### Rationale

Countries and experts around the world, including in Canada, are intensifying calls for taking action to maintain healthy ocean biodiversity and ocean ecosystems considering the multitude of threats including overfishing and climate change via the Convention on Biological Diversity (CBD) and the United Nations Framework Convention on Climate Change (UNFCCC), as well as via CITES. Sharks and rays play a key role in maintaining thriving ocean ecosystems. In new research released since CITES CoP18, an estimated 37% of chondrichthyan species (sharks, rays and chimaeras) are already threatened with extinction – the second highest rate among all vertebrate groups<sup>1</sup>.

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<sup>1</sup> Dulvy et al., Overfishing drives over one-third of all sharks and rays toward a global extinction crisis, Current Biology (2021),

The key threat to these species is overexploitation<sup>1</sup>; population declines are driven by the international trade for shark and ray products including in particular fins<sup>2</sup>. CITES has a critical role to play in slowing these declines by regulating the international shark and ray trade, but to date only 25% of the fin trade is regulated through CITES Appendix II listings. **CITES Parties must do more to control this global trade that is driving these ancient predators to extinction.**

Populations of many unlisted shark and ray species continue to plummet, and much of the trade driving these declines remains unmanaged in many countries and ocean regions. It is time to shift from a more reactive species-by-species approach to a more comprehensive and proactive approach focusing on listing at the family level, for example as has already been done for thresher sharks (family Alopiidae) and giant guitarfishes (family Glaucostegidae). There is strong precedent for listing species on CITES Appendices at the family or order level.

The need for listing all the hammerhead sharks is clear. In the eight years since the three large hammerhead shark species were listed in CITES Appendix II, improved research on the species composition and volume supplying the international fin trade demonstrates that the smaller-bodied hammerhead species are also being internationally traded for their fins.<sup>3</sup> There is also a risk that traded fins of the listed hammerhead shark species may be falsely claimed to be the unlisted species of small hammerhead sharks. This has already been raised as an issue of concern at the CITES Animals Committee in documents [AC30 Inf.14](#) and [AC Com.8](#). The species of concern are the remainder of the family not currently included on the CITES Appendices, mainly the smaller bodied species: *Sphyrna media*, *Sphyrna tudes*, *Sphyrna corona*, *Sphyrna gilberti*, *Eusphyrna blochii* and *Sphyrna tiburo*. These species' fins are either lookalikes for each other, or for already listed hammerhead species in their most commonly traded form (dried, unprocessed shark fins), thus necessitating a family-level listing approach.

In addition, the government of Panama, the host of CoP19, has submitted a proposal to list the entire family of requiem sharks on CITES Appendix II (Family Carcharhinidae), almost 70% of which have been assessed as threatened on the IUCN Red List of Threatened Species<sup>4</sup>. The inclusion of 19 lead species in the proposal is based on: 1) scientific evidence of population declines driven by unregulated international trade, 2) their status as Endangered or Critically Endangered on the IUCN Red List of Threatened Species, and 3) high volumes in the fin trade. The other species are included because their parts (i.e., dorsal, pectoral, caudal fins and meat) and products are difficult to distinguish (particularly by Customs and border control officers) from the other species within the family. Panama obtained the support of 40 co-sponsors from around the world (Bangladesh, Colombia, the Dominican Republic, Ecuador, El Salvador, the European Union (27 countries), Gabon, Israel, the Maldives, Senegal, the Seychelles, Sri Lanka, Syria and the UK), all of which recognize the urgent need to bring the majority of the shark fin trade under CITES control before more of these species become Endangered. This will be a priority issue for the CoP hosts at CoP19 in Panama City this November.

Listing the entire requiem shark family would facilitate efficient implementation and enforcement at the customs and border control level, helping to combat and prevent trafficking. It would bring the vast majority of the fin trade under CITES regulation, increasing the likelihood that every shipment of fins

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<https://doi.org/10.1016/j.cub.2021.08.062>

<sup>2</sup> Fields, A. T. *et al.* Species composition of the international shark fin trade assessed through a retail-market survey in Hong Kong. *Conserv. Biol.* **32**, 376–389 (2018).

<sup>3</sup> Cardeñosa *et al.* 2020. “[Species composition of the largest shark fin retail-market in mainland China](#).” *Scientific Reports*.

<sup>4</sup> Pacoureau, N., Rigby, C.L., Kyne, P.M. *et al.* Half a century of global decline in oceanic sharks and rays. *Nature* **589**, 567–571 (2021). <https://doi.org/10.1038/s41586-020-03173-9>

would contain CITES Appendix II species. Customs officials could then reasonably require that every such shipment be accompanied by CITES documents. This will reduce the burden and guess work for customs and border control. Furthermore, the additional permitting required would greatly improve data collection and help promote the sustainability and legality of the shark fin trade.

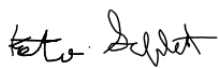
Together, the requiem and hammerhead shark and guitarfish ray family-level listing proposals would, when combined with the Appendix II shark and ray listings adopted at the past three CoPs, help ensure that only legal, sustainable trade in sharks and rays can continue. This safety net of full fin trade regulation will make it difficult for trade demands to shift from listed to unlisted species. For many of the species in trade, it is already too late – **action must be taken at CITES CoP19 to regulate the entire shark fin trade on CITES Appendix II, before widescale Appendix I listings and shark and ray trade bans are needed.**

## Conclusions

With Canada's adoption in 2019 of world-leading [measures](#) that prohibit the trade in detached shark fins and leadership at RFMOs, this focus on shark conservation at CITES CoP19 presents an opportunity to further showcase that leadership. Canada's support for sustainability checks pursuant to Appendix II regulation of any continued trade via these listing proposals would fit well with the domestic ban on the trade in detached shark fins, while acknowledging that other countries will continue to trade in shark fins, but that this trade should only go forward if it is sustainable and legal.

We ask Canada to join this effort to properly regulate the trade in shark fins, and work with Panama, the EU, the UK, and the other governments sponsoring shark and ray proposals at CITES to push for this essential action at CITES CoP19 by supporting these proposals, and helping them meet this ambitious agenda for sharks, and the world's oceans, this November at CITES CoP19.

Sincerely,



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