

Shark safeguards: Elevating EU controls on shark trade



ifaw



Vision:
Animals and people thriving together.



Mission:
Fresh thinking and bold action for animals, people and the place we call home.

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About IFAW

For over a decade, IFAW has been working with governments around the world to support better management for sharks and rays. From the development of shark identification materials for fisheries, customs and enforcement officers, to raising awareness on the conservation needs of shark species, and building the capacity of governments to meet their obligations under international conventions such as the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and the Convention on the Conservation of Migratory Species of Wild Animals (CMS). IFAW also provides technical support for governments looking to enact progressive and precautionary management for shark catch limits, or prohibitions when warranted, at a national level.

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Cover photo: © Robert Marc Lehmann
 Blue sharks.

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Abbreviations

EU – European Union
 EU MS – European Union Member States
 EU27 – the 27 European Union Member States
 EU-TWIX database – EU Trade in Wildlife Information eXchange database
 CITES – the Convention on International Trade in Endangered Species of Wild Fauna and Flora
 HS – Harmonized Commodity Description and Coding System, commonly referred to as the Harmonized System
 Qty – quantity
 kg – kilograms

Section 1

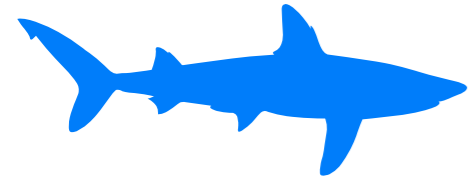
Introduction



Visual data overview of EU trade in shark fins and meat

Legal trade

Study period 2017-2021



>161 million kg import

of shark fins and meat reported by EU27

>169 million kg export

of shark fins and meat reported by EU27

Total import and export of fins and meat

Reporter(s) / Partner(s)	Total import quantity (kg)	Total import value	Total export quantity (kg)	Total export value
EU27 / All partners				
Shark fins	1,004,099	€8,085,598	12,761,166	€176,984,297
Shark meat	160,876,807	€366,810,323	156,500,277	€341,318,806
Total	161,880,906	€374,895,921	169,261,443	€518,303,103

Not only the shark fin trade represents a high economic value; the quantity and value of the meat trade is even more substantial for the EU27.

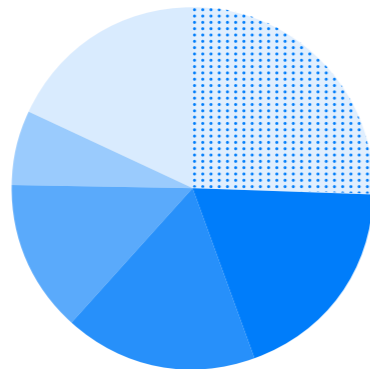
2x

The economic value of the (re-)export (including intra-EU trade) of shark meat is almost double the value of the fin export.

Top fin suppliers

>1 million kg import

of fins reported by EU27



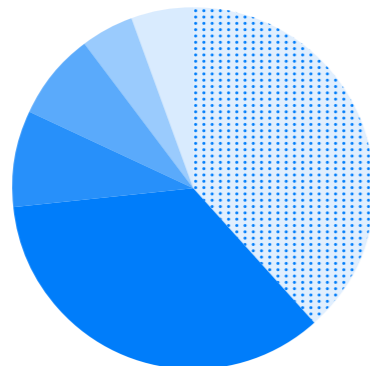
- Spain 25,6% (256,616 kg)
- Portugal 19,1% (191,760 kg)
- Morocco 17,2% (173,139 kg)
- United Kingdom 13,4% (134,629 kg)
- Netherlands 6,7% (67,466 kg)
- Rest 18,0% (180,489 kg)

Top five shark fin import partners (suppliers) by percentage and quantity.

Top fin receivers

>12 million kg export

of fins reported by EU27



- Singapore 38,6% (4,926,212 kg)
- China 34,8% (4,444,336 kg)
- Spain 8,7% (1,104,421 kg)
- Hong Kong 7,8% (994,115 kg)
- Taiwan 4,6% (591,250 kg)
- Rest 5,5% (700,832kg)

Top five shark fin export partners (receivers) by percentage and quantity

Import and export of meat by species

The shark meat data seems to suggest that the market for piked dogfish and catsharks is within the EU, while for blue shark there is clearly also a market outside of the EU.

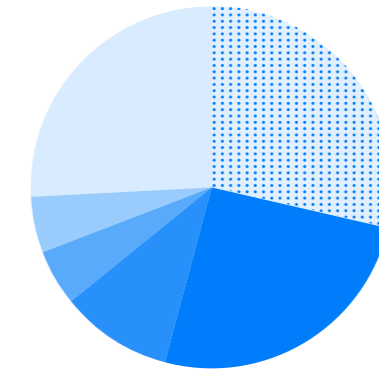
Shark meat categories	Import quantity (kg)	Import value	Export quantity (kg)	Export value
Blue shark	87,915,848	€128,872,067	86,945,510	€140,782,290
Piked dogfish and catsharks	19,660,050	€85,694,164	13,448,116	€49,358,271
Porbeagle shark	2,009,955	€6,223,918	2,925,650	€9,049,295
Other sharks	51,290,954	€146,020,174	53,181,001	€142,128,950
Totals	160,876,807	€366,810,323	156,500,277	€341,318,806

Total import and export value and quantity of shark meat reported by EU27.

Top meat suppliers

>160 million kg import

of meat reported by EU27



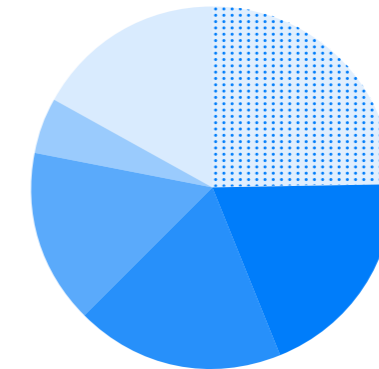
- Spain 28,7% (46,097,392 kg)
- Portugal 25,5% (41,055,420 kg)
- Namibia 10,0% (16,062,793 kg)
- United States 5,2% (8,433,537 kg)
- Japan 4,9% (7,906,568 kg)
- Rest 25,7% (41,321,097 kg)

EU27 top five shark meat import partners (suppliers) by percentage and quantity.

Top meat receivers

>156 million kg export

of meat reported by EU27



- Spain 24,9% (39,009,526 kg)
- Portugal 19,0% (29,725,520 kg)
- Italy 18,7% (29,317,180 kg)
- Brazil 15,5% (24,245,833 kg)
- Morocco 5,2% (8,141,784 kg)
- Rest 16,7% (26,060,434 kg)

EU27 top five shark meat export partners (receivers) by percentage and quantity.

Illegal trade

Study period 2017-2020



Photo: © Shane Gross

30

seizures of shark products were reported by only nine EU Member States in four years, of which 14 were registered under the common category 'Sharks' showcasing a lack a proper identification of the affected shark species

3

out of the 30 seizures took place at a maritime port despite the vast majority of shark products being transported through shipping

7

unregistered seizures - including five containing fins - were detected through a simple media search in different Member States with translated search terms

1

seizure consisted of shark fins (5.7 kg).

EU provides a platform for transit of illegal shark products

4 out of 8 significant seizures are transit shipments, intercepted by an EU Member State which was neither the country of origin nor the destination



Photo: © Shane Gross

>50%
of shark species are threatened or near threatened with extinction

>70%
decline of pelagic sharks (species found on the high seas) in only a 50-year period

Shark populations are functionally extinct on 20% of reefs surveyed globally.

Introduction

Sharks are incredibly important for ocean health as well as local livelihoods through the tourism and small-scale artisanal fisheries they support. Like other predators, sharks play an important role maintaining healthy ocean ecosystems¹. How and where they feed controls food chains, affecting the numbers and distribution of prey species, which has knock-on effects for various marine habitats. For example, the presence of tiger sharks has been shown to prevent turtles from overgrazing seagrass beds that play an important role as carbon sinks^{2,3}.

Large fish like sharks are also effective carbon sinks themselves, so keeping more large fish in our ocean by preventing overfishing helps reduce the carbon dioxide being released into our atmosphere⁴. Through their migrations and diving behaviour, sharks also help cycle nutrients between different locations in the ocean and between deep and shallow water⁵. A 2013 study estimated shark tourism generated more than USD314 million and supported more than 10,000 jobs around the world. In the following two decades the value of shark tourism was expected to generate more than the landed value of global shark fisheries⁶.

Yet, global demand for shark products, primarily fins and meat (see text box *Shark consumption*), together with a lack of catch and trade management, is driving shark populations to extinction. Recent research underlines the grim reality sharks face:

- ▶ More than 50% of shark species are threatened or near threatened with extinction.⁷
- ▶ Pelagic sharks (species found on the high seas) have declined more than 70% in only a 50-year period.⁸
- ▶ Shark populations are functionally extinct on 20% of reefs surveyed globally.⁹
- ▶ A study¹⁰ into the species composition of Hong Kong SAR's shark fin retail market revealed that more than two thirds of shark species found in trade are at risk of extinction, while most traded species come from coastal areas, with the authors concluding that trade regulation is urgently needed for coastal sharks as well.

The [European Union \(EU\)](#) plays a significant role in the global trade as a major catcher

and supplier to Asian markets. The International Fund for Animal Welfare (IFAW) undertook an extensive analysis of official raw customs data of [Hong Kong SAR](#), [Singapore](#) and [Taiwan province](#) and published the findings in its report [Supply and Demand: The EU's role in the global shark trade](#) on 1 March 2022, demonstrating that the EU is one of the top sources of shark fin products for these Asian markets¹¹. The report revealed that the EU provided up to 45% of shark fins coming into these hubs in 2020. It concluded that the EU has a responsibility to ensure that its participation in the global trade is not driving these species further towards extinction.

Crucial developments have taken place since the publication of IFAW's extensive trade analysis. The EU and its 27 Member States (EU27) took on a leadership role as marine conservation champions by proposing the bonnethead shark (*Sphyrna tiburo*) and five other species of small hammerhead shark for listing in Appendix II at the Convention on International Trade in Endangered Species (CITES) 19th Conference of the Parties (CoP19), which took place 14-25 November 2022.

Even more importantly, the EU decided to join ranks with [Panama](#) by co-sponsoring Panama's groundbreaking proposal, which was adopted at CoP19, and resulted in the listing of all 54 requiem sharks in Appendix II, including 19 Endangered and Critically Endangered species. Suffering population declines of more than 70% and in some cases local extinctions, trade management for these species was urgently needed.

IFAW's 2022 report, *Supply and Demand: The EU's role in the global shark trade*, was based on the analysis of legal data as registered by customs authorities from [Hong Kong SAR](#), [Singapore](#) and [Taiwan province](#), and therefore did not go into detail on all imports as registered by the EU nor total exports by the EU to other countries besides the three Asian trade hubs.

This report is based on follow-up research looking at both the *legal trade data* as reported by the EU27, covering import into and export by the EU27 to all countries worldwide, and also includes *illegal trade data* as registered by the Member States in the EU Trade in Wildlife Information eXchange database (EU-TWIX).

Regarding the legal data, the report complements the earlier research by providing:

- fuller details on the total trade between 2017 and 2021 by the EU27,
- new data on the economic value of all shark imports by the EU and the countries supplying shark products to the EU, and
- the export value and main destinations where EU Member States are exporting their products.

The illegal trade data focuses on seizures of shark products as reported by EU Member States between 2017 and 2020.

In researching both legal and illegal datasets, this study presents a comprehensive picture of the quantities and economic value of the shark trade as registered by the EU itself and identifies both its suppliers and export destinations while also providing an insight into the illegal trade activities taking place within the EU.

However, the illegal trade data, in particular, needs to be carefully interpreted; illegal trade numbers are limited to the extent that seizures are reported in a timely and correct manner by authorities in the EU-TWIX database. In addition, seizure numbers may indicate a certain level of illegal trade activities taking place in particular countries and/or detection in transit through those countries, but it could also signal stronger enforcement efforts by certain countries. Based on the report's findings, we

recommend necessary measures to strengthen the implementation of CITES protections for sharks. These should be implemented as a matter of urgency, particularly with additional shark species listings from CoP19 coming into effect in November 2023. While these recommendations arise from an analysis of data from the EU, they are highly relevant for all CITES Parties as they seek to ensure new and existing CITES protections for sharks are enforced.

Implementation and enforcement are urgently needed to prevent the global demand from driving shark species to a point of no return.

Barbara Slee
Author,
IFAW Senior Program Manager,
International Policy

- ◀ A bonnethead shark over seagrass bed.
- ▼ Store with dried products showing the head of two shortfin mako sharks, a hammerhead shark specimen and a shark mandible.

Sharks and climate change

Driven by demand for meat and fins, sharks are declining at a staggering rate. Sharks are vital to ocean health and are being increasingly recognised for the important role they play in the fight against climate change. As predators, many sharks are responsible for maintaining a balanced ecosystem which helps keep greenhouse gases in the ocean and out of the atmosphere.

Coral reefs and seagrass meadows are important ocean ecosystems for retaining blue carbon – the carbon captured by the world's oceans. Sharks are key to keeping these ecosystems healthy and functioning. For example, if reef shark populations decline, fewer snapper and grouper fish will be eaten. As snapper and grouper numbers increase, their food source - algae-eating fish – will decrease. Without adequate populations of algae-eating fish, algae could take over and kill the coral. For seagrass, the presence of sharks helps to scare sea turtles away which keeps their grazing to a sustainable level. Plummeting shark numbers means sea turtles are more likely to overgraze the seagrasses¹². Once destroyed, seagrass and corals release their blue carbon stores which contributes to global warming.

A shark's body is another source of blue carbon. It is estimated that sharks are made up of 10-15 percent carbon and when they die, they sink to the bottom of the ocean and become deep-sea carbon

sinks. Overfishing disrupts this process and means much of that stored carbon is released into our atmosphere¹³.

Having more sharks around to perform their critical ecosystem functions keeps the oceans healthy and reduces the impacts of global climate change. That means efforts to conserve sharks benefit more than just the sharks themselves; they help the entire planet.



Shark consumption¹⁴

Global demand for shark products, and trade associated with this demand, has expanded at an unprecedented rate over the past few decades. Shark products include fins, meat, skin and liver oil. While shark fins used to be the product most in demand, in recent years demand for shark meat has increased significantly.

Fins are utilised primarily in the preparation of soups and other dishes in [East Asia](#), consumed at weddings and other

celebrations. Shark fins can be extremely high-value, with prices ranging significantly depending on quality and shark species. Overall, fin size determines the price, with a single large, processed fin reaching up to USD \$846 per kg in [Hong Kong](#).

Meat is consumed around the world. The price of shark meat varies depending on species, region and where in the supply chain the product is sold. For example, prices can range from less than \$1 per kg on a beach in [Mexico](#) to \$24 per kg on the retail market in [Australia](#).

- Other products in trade include:
- ▶ Crude shark cartilage - sold as traditional remedy for a range of human diseases.
 - ▶ Shark skin - used for making leather products such as belts, purses, bags, and shoes.
 - ▶ Shark liver oil - used in the production of sunscreen, beauty and skin care products, and pharmaceuticals.
 - ▶ Shark jaws and teeth - used for decorations, souvenirs and jewellery.

Mislabelling of shark products across the supply chain is common and obstructs the effective management of fisheries and regulation of trade in these products. Shark products are often sold under vernacular names that disguise the species. For example, shark meat is frequently labelled as "saumonette" (little salmon) in France, "rock salmon" in the [UK](#) and "ocean fillets" in [South Africa](#)¹⁵. Without correct information on species identity and origin, consumers could unintentionally be eating species at risk of extinction.

Section 2

Methods





Methods

This report is based on the following sources of information:

- ▶ EU legal trade data from 1 January 2017 until 31 December 2021, and

- ▶ EU-TWIX (EU Trade in Wildlife Information eXchange database) seizure data from 1 January 2017 until 31 December 2020 plus examples of media articles referencing seizures not registered within the EU-TWIX database.



Figure 1. Screenshot showing the EU trade statistics tool, where trade data can be gathered by searching on HS code, reporting country and trade partner, with variable 1: HS code, which is any of the 27 HS codes for shark products; variable 2: Reporters, which is any of the EU27 countries or EU27 as whole; and variable 3: Partners, which represents any of the EU's partner countries, including EU Member States, but also all countries outside of the EU with which trade has been reported.

EU legal trade data

The first part of this report focuses on trade data regarding products from shark species as reported by the EU27 via customs systems and registered in the EU Access2Markets online database¹⁶, for the period 2017-2021. The data was extracted on 22 August 2022 prior to the listing of the additional 97 shark and ray species in Appendix II at CITES CoP19 in Panama. This study could therefore be considered a baseline measurement of reporting before the new listings have all come into force (25 November 2023)¹⁷. Trade is reported through the codes of the Harmonized System (HS)¹⁸, which provides 27 HS codes for shark products; three codes for shark fins and 24 for shark meat. Few HS codes provide species-specific information for meat-related products, while codes for fins only distinguish between the state of the product (fresh/frozen, etc) and do not provide any species-specific information. It must be noted that there is no specific HS code for shark cartilage, which is often an ingredient in certain food supplements. For this reason, cartilage is not included in the online EU trade database and thus not mentioned in this section of the report. However, this does not mean that cartilage is not traded within and outside of the EU. For more details on the HS codes please see *Annex 1*.

On the basis of the HS codes the shark meat products are divided among three groups of species - corresponding to the protected status of certain species at the time of the data extraction (August 2022) - and one rest category named 'other sharks', while there is no differentiation of species within the shark fin category. Regarding shark meat, this report therefore specifically highlights the findings of category 'blue shark (*Prionace glauca*)', category 'piked dogfish (*Squalus acanthias*) and catsharks (*Scyliorhinus spp*)', category 'porbeagle shark (*Lamna nasus*)', and unspecified species are considered under the rest category 'other sharks'. For more details on the species and protection status see *Annex 2*.

In this database, trade data can be gathered by searching on HS code, reporting country and trade partner (*Figure 1*).

For the scope of this research report, EU27 has been selected as Reporter, as this gives

the most comprehensive overview of total trade data for the EU. We realised there are discrepancies between what individual EU Member States report as being traded, compared to what all the EU Member States report for each individual country. As partners we used the selection 'All countries', as this gives the most comprehensive view of total trade for the EU with all possible partners worldwide.

This resulted in 27 database exports, which were collected in Excel and combined into one master file containing data for all 27 fin and meat codes. The tables and graphs included in the report are the result of this combined file and outline trade in the 27 codes by trade value, trade quantity and top five trading partners of the EU27. The ranking order used in the tables in this report is based on quantity.

It is important to note that the import and export data gathered are the numbers as reported by EU27 which in practice does not cover all 27 Member States as not all 27 Member States trade in shark products. Moreover, we would like to stress that trade partners include both non-EU countries as well as EU Member States, as internal trade between EU Member States is also reported as import and export in the database.

It is also important to note that any reference in the report to 'export' can be considered to also include re-export of products.

EU illegal trade data

The second part of this report focuses on seizure data consisting of EU-TWIX data and media articles. Seizures are an indicator that illegal trade takes place in species listed in CITES Appendices and/or Annexes to the EU Wildlife Trade Regulation (Council Regulation (EC) No. 338/97).

The information about CITES-related seizures is provided by TRAFFIC with the authorisation of Member States. The data was extracted from the EU-TWIX seizure database on 22 April 2022 and covers the period 1 January 2017 up to 31 December 2020 for 26 EU Member States, as Hungary did not give permission for use of its seizure data as registered in the EU-TWIX database. Countries can take a longer time to submit

their seizure data into the TWIX database. Therefore, the data for the year 2021 was unlikely to be comprehensive at the time of the request and is thus not included. Please note that the data extraction period for illegal trade differs from the legal trade extraction period, as 2021 was included in the legal trade dataset.

In this report we have included seizures with number of seizures, kilograms or other quantifying info. The registration of quantities and values is not consistent in the EU-TWIX data (e.g., certain authorities submit seizure data in kilogram while others use litres or numbers of bottles) which limits the possibility of listing seizure data in a coherent fashion. Even though these quantifying details are not uniformly reported, the findings do give information on the frequency and size of seizures.

This section also includes an overview of examples of media articles which describe seizures of sharks and/or shark products, which have not been registered by authorities in the EU-TWIX database. This selection is not intended to provide an exhaustive overview, but merely shows that not all seizures seem to be reported by Member States in the EU-TWIX database. Media articles that are included cover only a few EU Member States where a simple Google search on 'seizure/confiscation shark fins' or 'seizure/confiscation shark meat' in appropriate language provided links to articles published between 2017 and 2021.

◀ Spiny dogfish shark.

Findings





Legal trade

The data shows significant quantities of traded shark products; over 161 million kg of fins and meat was imported into the EU between 2017 and 2021, and over 169 million kg of fins and meat was exported from the EU in the same period (Table 1). Not only the quantities show significant numbers; also the value of the fin and meat trade is significant for the EU, with a total import value of over €374 million and a total export value over €518 million (Table 1)¹⁹.

What stands out from the legal trade data is that there are three EU Member States unevenly represented as either destination, origin or both for most of the trade: Italy, Portugal and Spain, with the latter two as number one and two as both import partner (supplier) (Table 2) and export partner (receiver) (Table 3).

▲ Shark fins drying.

◀ School of Caribbean reef sharks swim over the coral reef, Gardens of the Queens, Cuba.

>161 million kg import

of fins and meat into the EU between 2017 and 2021

>€374 million

total EU import value of fins and meat between 2017 and 2021

>169 million kg export

of fins and meat from the EU between 2017 and 2021

>€518 million

total EU export value of fins and meat between 2017 and 2021

Reporter(s) / Partner(s)	Total import quantity (kg)	Total import value	Total export quantity (kg)	Total export value
EU27 / All partners				
Shark fins	1,004,099	€8,085,598	12,761,166	€176,984,297
Shark meat	160,876,807	€366,810,323	156,500,277	€341,318,806
Total	161,880,906	€374,895,921	169,261,443	€518,303,103

Table 1. EU27 total import and export of shark fins and meat 2017-2021

Partner country (suppliers)	Import quantity (kg)
Spain	46,354,008
Portugal	41,247,180
Namibia	16,062,793
United States	8,433,537
Japan	7,906,568

Table 2. EU27 import quantity of shark fins and meat, top five supplying partners 2017-2021

Partner country (receivers)	Export quantity (kg)
Spain	40,113,947
Portugal	29,735,366
Italy	29,365,072
Brazil	24,246,231
Morocco	8,161,541

Table 3. EU27 export quantity of shark fins and meat, top five receiving partners 2017-2021



Photo: © Robert Marc Lehmann

Shark fins

In terms of total numbers for both value and quantity, shark fin data, as shown in *Table 1*, account for smaller quantities and values. However, it must be noted that the lower numbers could be misleading from a conservation perspective. One kilogram of shark fins does not represent the same amount of dead sharks when compared to one kilogram of shark meat; a shark fin weighs on average only 2% of a shark's whole weight²⁰.

There are only three HS codes for shark fins in the harmonized system without any differentiation between species. Therefore, it cannot be determined from the codes whether the fins were originally attached to

sharks which have a protected or endangered status or not.

Table 4 shows a high import/export quantity and value of shark fins. Also worth noting is the difference between the quantity of import and export of shark fins. Total import quantity is 1,004,099 kg, whereas the total export quantity is 12,761,166 kg.

Three EU Member States, [Spain](#), [Portugal](#) and the [Netherlands](#), are in the top five trading partners providing shark fins for import by EU Member States (*Table 5; Figure 2*). Similar to the 2022 IFAW report²¹ - [Hong Kong SAR](#), [Singapore](#) and [Taiwan province](#) are among the main destinations for shark fin

exports by the EU, and the current findings add [China](#) as number two to this list of destinations (*Table 6; Figure 3*). In addition, [Spain](#) is among the top five receiving partners in the trade from EU Member States, suggesting the processing of fins before re-export and/or a large proportion of internal EU trade is taking place.

▲ A blue shark swims with fin exposed above water.

► Shark dorsal and/or pectoral fins hung up to dry on a rooftop of an industrial building in Kennedy Town, Sai Wan, Hong Kong SAR, China.



Photo: © Stan Shea

>1 million kg import

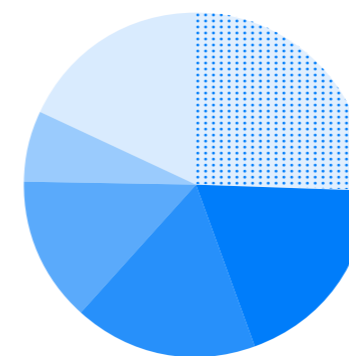
total import quantity of shark fins reported by EU27 between 2017-2021

>12 million kg export

total export quantity of shark fins reported by EU27 between 2017-2021

Category	Import quantity (kg)	Import value	Export quantity (kg)	Export value
030292 Fresh or chilled	181,520	€1,074,778	235,139	€1,886,782
030392 Frozen	701,571	€4,841,481	11,681,327	€140,235,403
030571 Dried	121,008	€2,169,339	844,700	€34,862,112
Total	1,004,099	€8,085,598	12,761,166	€176,984,297

Table 4 Total import and export value and quantity of shark fins reported by EU27 between 2017-2021

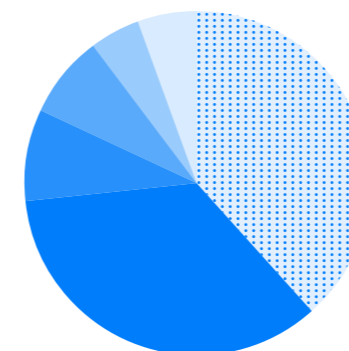


- Spain 25,6%
- Portugal 19,1%
- Morocco 17,2%
- United Kingdom 13,4%
- Netherlands 6,7%
- Rest 18,0%

Figure 2 Top five shark fin import partners (suppliers) by percentage 2017-2021

Partner country (suppliers)	Import quantity (kg)
Spain	256,616
Portugal	191,760
Morocco	173,139
United Kingdom	134,629
Netherlands	67,466

Table 5 EU27 import quantity of shark fins, top five supplying partners 2017-2021



- Singapore 38,6%
- China 34,8%
- Spain 8,7%
- Hong Kong 7,8%
- Taiwan 4,6%
- Rest 5,5%

Figure 3 Top five shark fin export partners (receivers) by percentage 2017-2021

Partner country (receivers)	Export quantity (kg)
Singapore	4,926,212
China	4,444,336
Spain	1,104,421
Hong Kong	994,115
Taiwan	591,250

Table 6 EU27 export quantity of shark fins, top five receiving partners 2017-2021



Photo: © Tom Burns

Shark meat

The total quantities of shark meat trade are registered through 24 HS codes and differentiated into four categories: 'blue shark' (*Prionace glauca*), 'piked dogfish' (*Squalus acanthias*) and catsharks (*Scylliorhinus spp*), 'porbeagle shark (*Lamna nasus*)' and 'other sharks'. These species include protected and non-protected species, and it must be noted that the category 'other sharks' can include protected species as well, but the species was not specified at import or export.

Overall, the quantity of import (160,876,807 kg) and export (156,500,277 kg) in the period 2017-2021 is very high (Table 7). More than half of the import quantity and more than half of the export quantity consists of blue shark. Almost a third of the total amount of shark meat imported and almost a third of the export is registered within the 'other sharks' category, not providing any other details on the traded shark species and therefore it remains unknown whether this concerns protected species.

Spain and Portugal top the list as both import and export partner for EU Member States. In addition to these two, Italy is the third largest destination for other EU Member States exporting shark meat. (Table 8, Table 9, Figure 4, Figure 5).

- ▲ A group of sandbar sharks.
- The bodies of sharks at a shark & tuna fish landing port in Pingtung, southern Taiwan, China.



Photo: © Stan Shea

>160 million kg import

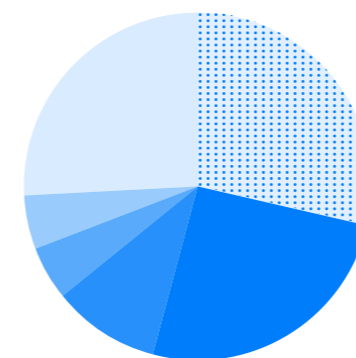
of shark meat reported by EU27 between 2017-2021

>156 million kg export

of shark meat reported by EU27 between 2017-2021

Shark meat categories	Import quantity (kg)	Import value	Export quantity (kg)	Export value
Blue shark	87,915,848	€128,872,067	86,945,510	€140,782,290
Piked dogfish and catsharks	19,660,050	€85,694,164	13,448,116	€49,358,271
Porbeagle shark ²²	2,009,955	€6,223,918	2,925,650	€9,049,295
Other sharks	51,290,954	€146,020,174	53,181,001	€142,128,950
Total	160,876,807	€366,810,323	156,500,277	€341,318,806

Table 7 Total import and export value and quantity of shark meat reported by EU27 between 2017 and 2021

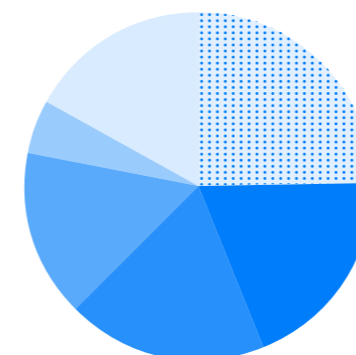


- Spain 28,7%
- Portugal 25,5%
- Namibia 10,0%
- United States 5,2%
- Japan 4,9%
- Rest 25,7%

Figure 4 Top five shark meat import partners (suppliers) by percentage 2017-2021

Partner country (suppliers)	Import quantity (kg)
Spain	46,097,392
Portugal	41,055,420
Namibia	16,062,793
United States	8,433,537
Japan	7,906,568

Table 8 EU27 import quantity of shark meat, top five supplying partners 2017-2021



- Spain 24,9%
- Portugal 19,0%
- Italy 18,7%
- Brazil 15,5%
- Morocco 5,2%
- Rest 16,7%

Figure 5 Top five shark meat export partners (receivers) by percentage 2017-2021

Partner country (receivers)	Export quantity (kg)
Spain	39,009,526
Portugal	29,725,520
Italy	29,317,180
Brazil	24,245,833
Morocco	8,141,784

Table 9 EU27 export quantity of shark meat, top five receiving partners 2017-2021

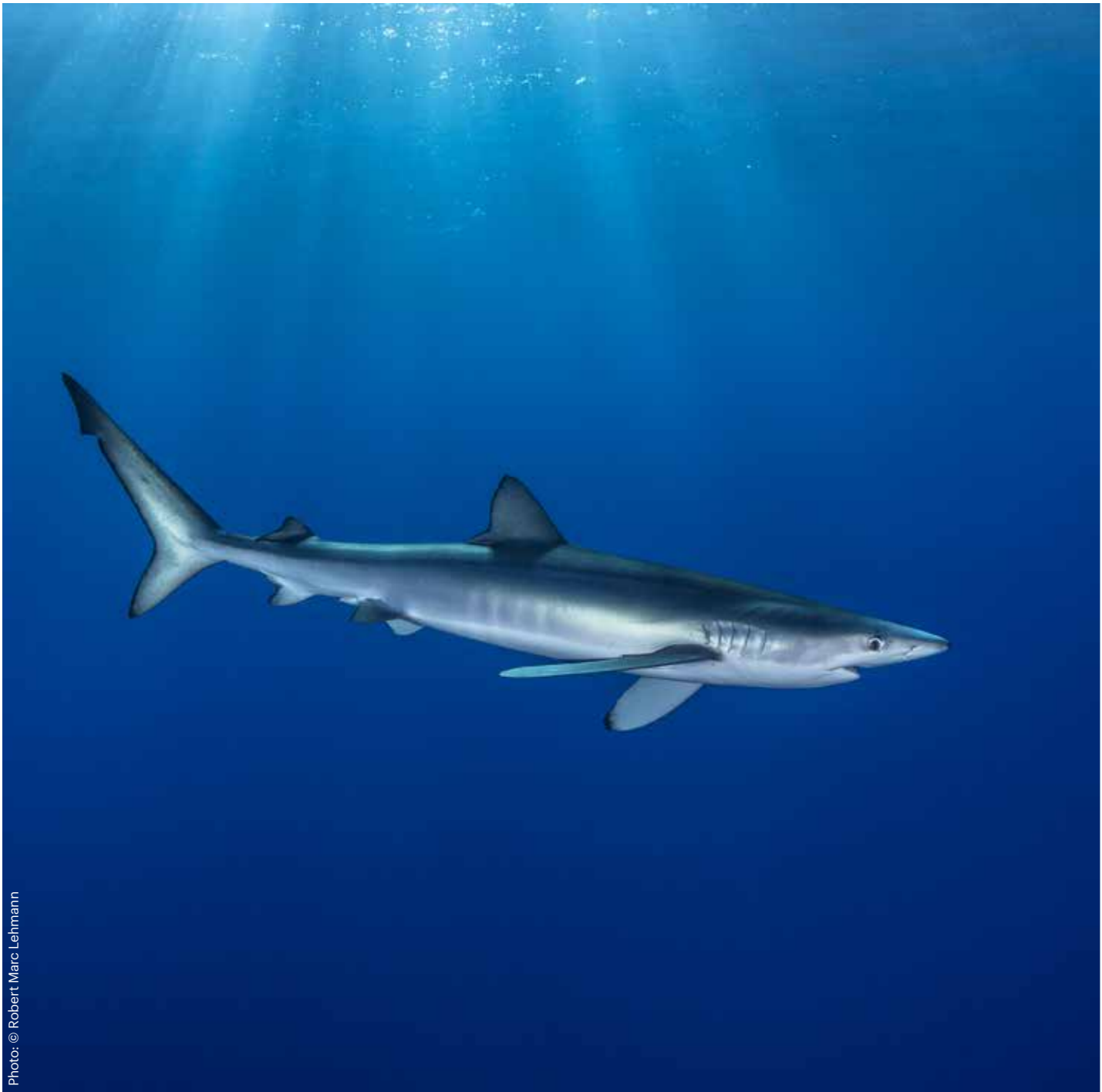


Photo: © Robert Marc Lehmann

Blue shark

The blue shark is part of the Carcharhinidae family within the Carcharhiniformes order and also known as the great blue shark. The blue shark is listed as Near Threatened on the IUCN Red List. This species was not listed on the CITES Appendices at the time of data extraction (August 2022) but has been listed in CITES Appendix II since and this listing will come into force on 25 November 2023.

Blue shark is the most traded shark species in the EU meat trade, with a total of 87,915,848 kg imported and 86,945,510 kg exported (Table 10), which represents more than half of the total quantity of import and more than half of the total export. Overall,

the import quantities are nearly equal to the exported quantities, and frozen blue shark is most commonly traded.

Spain and Portugal are the main Member States providing blue shark meat for the EU, jointly representing more than half of the total import, while Namibia, Japan and Panama make up the rest of the top five countries supplying blue shark meat (Table 11, Figure 6).

Spain and Portugal also receive the most EU exports of blue shark meat, followed by Brazil, Italy and Morocco as top five export partners (Table 12, Figure 7).

The fact that Spain and Portugal are both major suppliers and major receivers of blue shark meat suggests the meat is processed for re-export and/or there is a large internal EU market for blue shark meat, in addition to blue shark meat exported outside the EU.

- ▲ A blue shark.
- Stack of blue sharks under ice for sale at the port of Vigo, Galicia Spain.



87,915,848 kg import

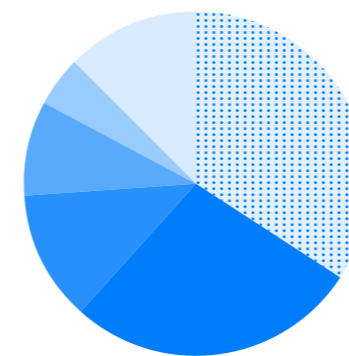
of blue shark meat reported by EU27 between 2017-2021

86,945,510 kg export

of blue shark meat reported by EU27 between 2017-2021

Blue shark meat	Import quantity (kg)	Import value	Export quantity (kg)	Export value
03028140 Fresh or chilled	3,363,205	€6,532,310	4,151,757	€7,210,753
03038140 Frozen	78,353,225	€106,370,551	76,938,672	€119,147,096
03044730 Fresh or chilled fillets	292,394	€704,450	1,213,797	€2,456,522
03045630 Other meat fresh chilled	90,365	€206,558	949	€50,560
03048818 Frozen fillets	2,022,307	€4,883,102	1,641,950	€4,146,710
03049630 Other meat frozen	3,794,352	€10,175,096	2,998,385	€7,770,649
Total	87,915,848	€128,872,067	86,945,510	€140,782,290

Table 10 Total import and export value and quantity of blue shark reported by EU27 between 2017 and 2021

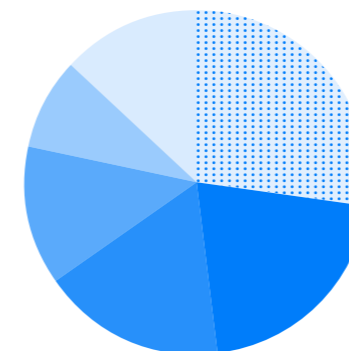


- Spain 34,2%
- Portugal 27,6%
- Namibia 12,3%
- Japan 8,9%
- Panama 4,5%
- Rest 12,5%

Figure 6 Top five blue shark import partners (suppliers) by percentage 2017-2021

Partner country (suppliers)	Import quantity (kg)
Spain	30,080,871
Portugal	24,262,984
Namibia	10,775,778
Japan	7,839,045
Panama	3,939,394

Table 11 EU27 import quantity of blue shark, top five supplying partners 2017-2021



- Spain 27,4%
- Portugal 20,7%
- Brazil 17,3%
- Italy 13,1%
- Morocco 8,5%
- Rest 13,0%

Figure 7 Top five blue shark export partners (receivers) by percentage 2017-2021

Partner country (receivers)	Export quantity (kg)
Spain	23,862,203
Portugal	17,976,244
Brazil	15,013,171
Italy	11,379,355
Morocco	7,384,245

Table 12 EU27 export quantity blue shark, top five receiving partners 2017-2021



Piked dogfish and catsharks

Piked dogfish is part of the Squalidae family within the Squaliformes order. The piked dogfish is listed in the IUCN Red List of threatened species as Vulnerable globally and Critically Endangered in the Northern Atlantic. Catsharks are part of the Scyliosinidae family within the Carcharhiniformes order. Catsharks are currently listed in the IUCN Red List as being Least Concern, because there is no evidence to indicate that the global populations have declined significantly.

Piked dogfish and catsharks are the second most traded species, with a total of 19,660,050 kg imported and 13,448,116 kg exported (Table 13). The data seems to

suggest that most of the imported piked dogfish and catsharks meat stays in the EU, which is supported by the top five export partners (receivers) which are all EU Member States. (Table 14; Table 15).

The Netherlands, Belgium and France are the main EU Member States supplying piked dogfish and catsharks meat for import in the EU, while the United States and Norway are the main suppliers as non-EU countries (Table 14; Figure 8).

There are no destinations outside the EU among the top five receiving partners for piked dogfish and catsharks meat. Italy,

France, Spain, the Netherlands and Hungary are the main EU export partners (Table 15; Figure 9).

- ▲ Catshark in reef at night.
- ▶ Stack of catsharks.



19,660,050 kg import

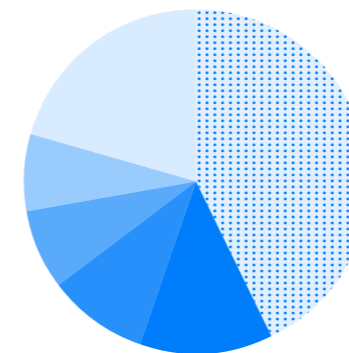
of piked dogfish and catsharks meat reported by EU27 between 2017-2021

13,448,116 kg export

of piked dogfish and catsharks meat reported by EU27 between 2017-2021

Piked dogfish and catsharks	Import quantity (kg)	Import value	Export quantity (kg)	Export value
03028140 Fresh or chilled	8,429,293	€35,340,819	7,925,491	€30,856,571
03038140 Frozen	7,665,735	€21,676,549	3,815,824	€11,773,007
03044730 Fresh or chilled fillets	1,722,311	€18,928,107	827,922	€2,823,420
03045630 Other meat fresh chilled	146,026	€811,502	224,525	€990,623
03048818 Frozen fillets	460,733	€2,130,987	303,589	€1,490,617
03049630 Other meat frozen	1,235,952	€6,806,200	350,765	€1,424,033
Total	19,660,050	€85,694,164	13,448,116	€49,358,271

Table 13 Total import and export value and quantity of piked dogfish and catsharks reported by EU27 between 2017 and 2021

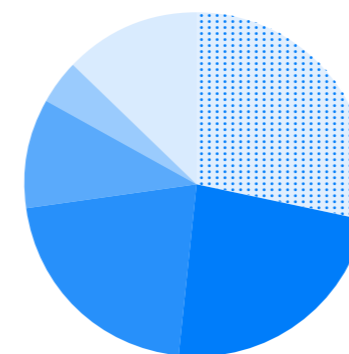


- ⋮ United States 42,9%
- Netherlands 12,7%
- Belgium 9,2%
- Norway 7,6%
- France 7,2%
- Rest 20,5%

Figure 8 Top five piked dogfish and catsharks import partners (suppliers) by percentage 2017-2021

Partner country (suppliers)	Import quantity (kg)
United States	8,426,458
Netherlands	2,490,487
Belgium	1,804,942
Norway	1,487,504
France	1,422,291

Table 14 EU27 import quantity of piked dogfish and catsharks, top five supplying partners 2017-2021



- ⋮ Italy 28,4%
- France 23,3%
- Spain 21,2%
- Netherlands 10,4%
- Hungary 4,0%
- Rest 12,7%

Figure 9 Top five piked dogfish and catsharks export partners (receivers) by percentage 2017-2021

Partner country (receivers)	Export quantity (kg)
Italy	3,817,930
France	3,130,089
Spain	2,846,003
Netherlands	1,401,397
Hungary	543,275

Table 15 EU27 export quantity of piked dogfish and catsharks, top five receiving partners 2017-2021



Porbeagle shark

Porbeagle shark is part of the Lamnidae family within the Lamniformes order. The porbeagle shark is listed in the IUCN Red List of threatened species as Vulnerable and listed in CITES Appendix II and Annex B of EU Regulation 338/97 (Wildlife Trade Regulation).

Porbeagle shark was the only CITES-listed species of the shark species registered with HS codes at the time of data extraction (August 2022) for this report. The total values and traded quantities are considerable. A total of 2,009,955 kg is imported, and the total export quantity is 2,925,650 kg in the period 2017–2021 (Table 16).

Spain, Portugal, France and Germany are all in the top five countries providing porbeagle shark meat for the EU, together with the United Kingdom as a non-EU provider (Table 17; Figure 10).

Spain, Italy, France, Portugal and Malta are the top five receiving partners for EU exports. It is important to note that there are no non-EU destinations for porbeagle shark meat export in the top five (Table 18; Figure 11), suggesting that, as with piked dogfish and catsharks, there is a large internal market for porbeagle meat.

Results show that Spain is by far the largest importing and exporting country of porbeagle shark meat (Table 17, Table 18; Figure 10, Figure 11).

- ▲ Porbeagle shark.
- A fishmonger with porbeagle shark meat.

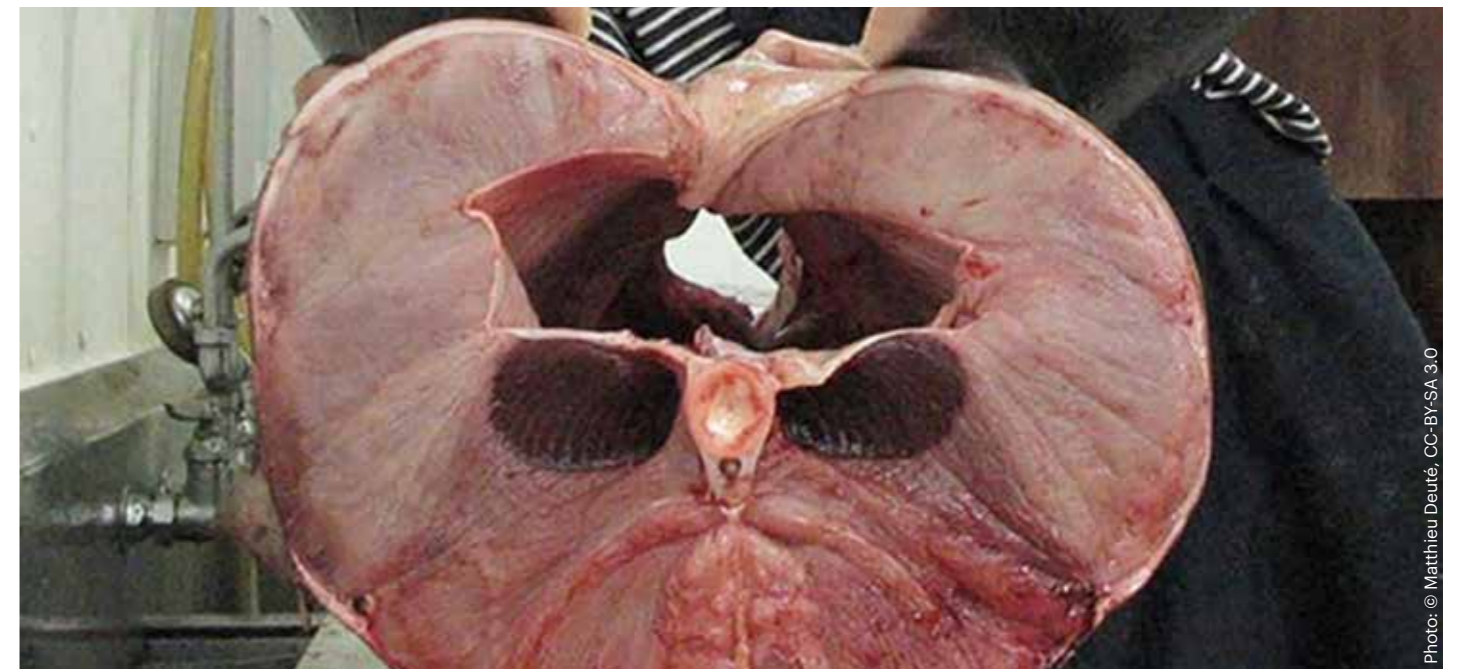


Photo: © Matthieu Deuté, CC-BY-SA 3.0

2,009,955 kg import

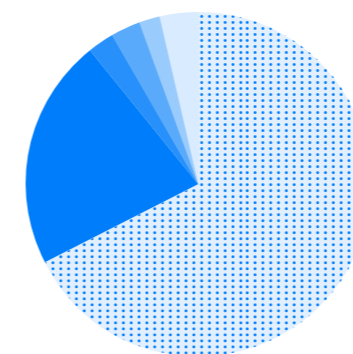
of porbeagle shark meat reported by EU27 between 2017–2021

2,925,650 kg export

of porbeagle shark meat reported by EU27 between 2017–2021

Porbeagle shark	Import quantity (kg)	Import value	Export quantity (kg)	Export value
03028140 Fresh or chilled	331,455	€1,276,373	2,182,949	€5,592,985
03038140 Frozen	1,267,807	€3,276,684	713,482	€3,296,980
03044730 Fresh or chilled fillets	78,731	€477,599	8,459	€57,240
03045630 Other meat fresh chilled	19,913	€66,532	631	€2,239
03048818 Frozen fillets	230,662	€861,388	17,785	€57,220
03049630 Other meat frozen	81,387	€265,342	2,344	€42,631
Total	2,009,955	€6,223,918	2,925,650	€9,049,295

Table 16 Total import and export value and quantity of porbeagle shark reported by EU27 between 2017 and 2021

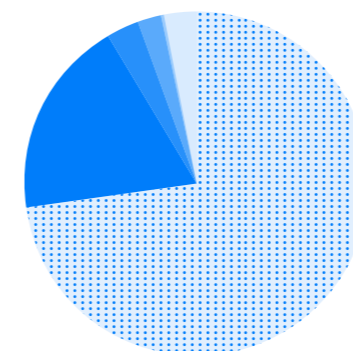


- Spain 67,6%
- Portugal 21,7%
- United Kingdom 2,6%
- France 2,6%
- Germany 1,9%
- Rest 3,6%

Figure 10 Top five porbeagle shark import partners (suppliers) by percentage 2017–2021

Partner country (suppliers)	Import quantity (kg)
Spain	1,3592,262
Portugal	435,472
United Kingdom	53,115
France	51,926
Germany	38,482

Table 17 EU27 import quantity of porbeagle shark, top five supplying partners 2017–2021



- Spain 72,9%
- Italy 18,7%
- France 3,0%
- Portugal 2,1%
- Malta 0,5%
- Rest 2,8%

Figure 11 Top five porbeagle shark export partners (receivers) by percentage 2017–2021

Partner country (receivers)	Export quantity (kg)
Spain	2,133,987
Italy	546,575
France	87,999
Portugal	61,657
Malta	13,679

Table 18 EU27 export quantity of porbeagle shark, top five receiving partners 2017–2021

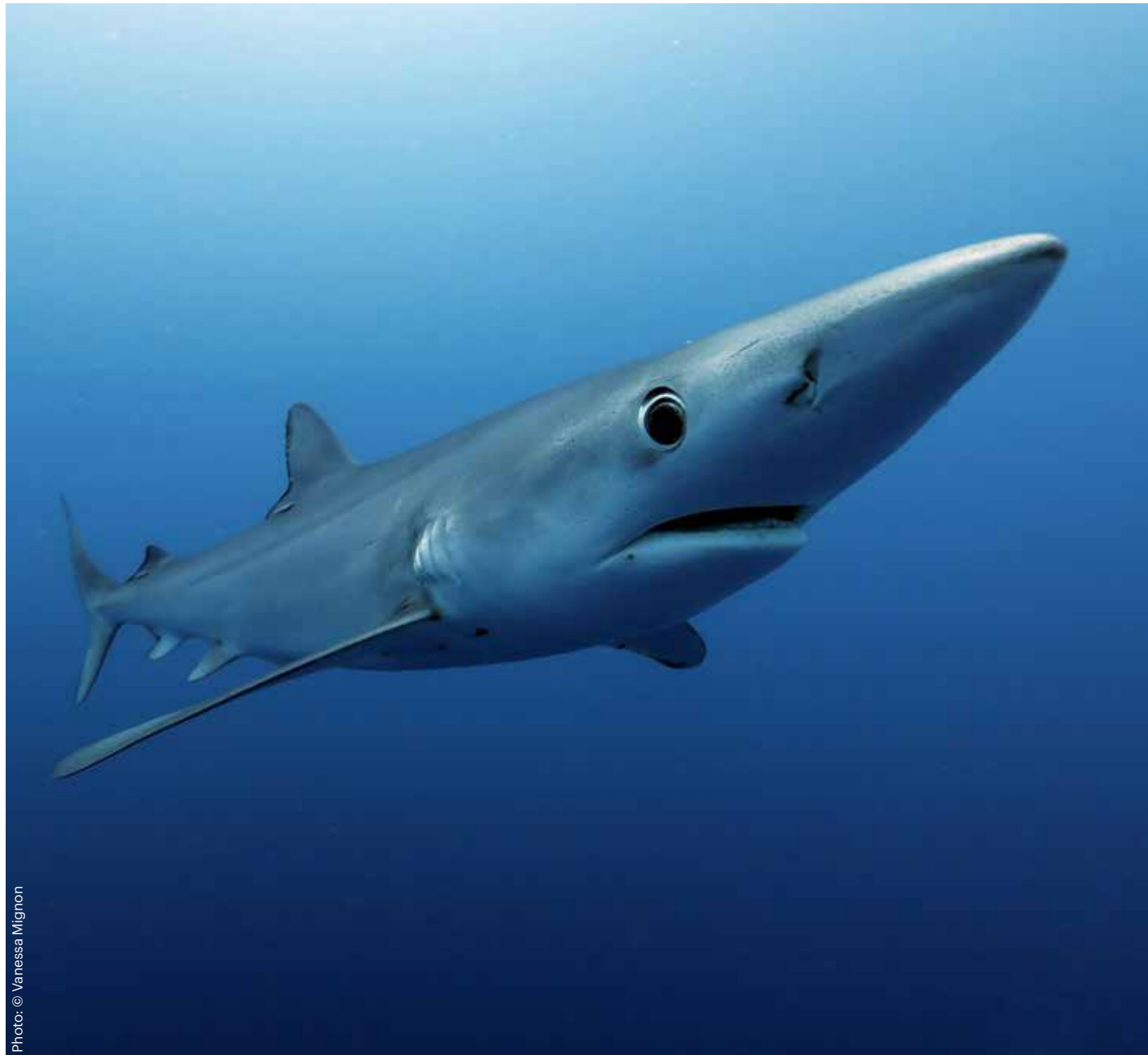


Photo: © Vanessa Mignon

Other sharks

The lack of species identification within this category means it cannot be determined whether this concerns species with an endangered or protected status. The recording of any trade movement within the category 'other sharks' could mean multiple things; it registers trade in any shark other than the ones specified in the codes, it was unclear to the authorities which species it concerned, or it could also be a category used to hide species with an endangered and/or protected status.

With the additional listing of 97 shark and ray species in Appendix II at CITES CoP19, trading Parties will now need to provide proof of both the legal and sustainable source of the products of those listed species. For proper monitoring of the shark trade, it will be important to register the trade in those listed

species through the CITES permitting procedure. However, it may also be prudent to develop appropriate new HS codes so that customs trade data also accurately captures the extent of trade in CITES-listed species.

The import and export of 'other sharks' meat into the EU represents a very large part of the overall shark products trade. In terms of value, it is the largest category; in terms of quantity, it ranks second (Table 7).

Within the 'other sharks' category for shark meat the total quantity of import (51,290,954 kg) and export (53,181,001 kg) in the period 2017-2021 is considerable. The code 03038190 Frozen within 'other sharks' is the largest in terms of value and quantity export (Table 19).

Portugal, Spain, France and Croatia are the main partners providing 'other sharks' meat for the EU, while Namibia is the largest non-EU provider (Table 20; Figure 12).

Italy, Portugal, Spain and Germany are the main receiving partners within the EU, and Brazil ranks fourth in the top five export partner countries (Table 21; Figure 13). The top partner countries data seems to suggest that most of the 'other sharks' meat stays within the EU and/or products are processed for re-export within the EU.

- ▲ A requiem shark in the ocean near South Africa.
- ▶ Requier shark head for sale on a market in Spain.



51,290,954 kg import

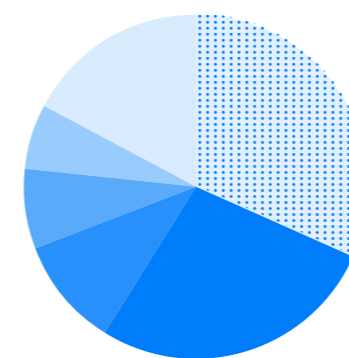
of 'other sharks' category for shark meat reported by EU27 between 2017-2021

53,181,001 kg export

of 'other sharks' category for shark meat reported by EU27 between 2017-2021

Other sharks	Import quantity (kg)	Import value	Export quantity (kg)	Export value
03028140 Fresh or chilled	15,590,806	€59,578,186	9,838,947	€27,056,950
03038140 Frozen	33,340,247	€74,647,799	40,535,277	€97,612,245
03044730 Fresh or chilled fillets	397,367	€2,839,184	474,186	€2,115,919
03045630 Other meat fresh chilled	279,566	€2,761,941	21,631	€76,341
03048818 Frozen fillets	1,129,858	€3,958,065	573,722	€2,326,838
03049630 Other meat frozen	553,110	€2,234,999	1,737,238	€12,940,657
Total	51,290,954	€146,020,174	53,181,001	€142,128,950

Table 19 Total import and export value and quantity of other sharks reported by EU27 between 2017 and 2021

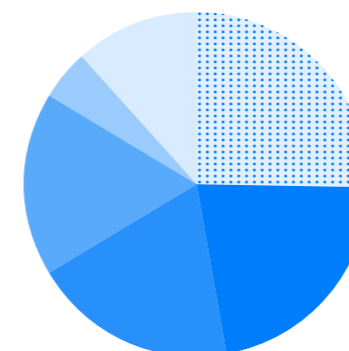


- Portugal 31,7%
- Spain 27,3%
- Namibia 10,3%
- France 7,4%
- Croatia 6,2%
- Rest 17,1%

Figure 12 Top five other sharks import partners (suppliers) by percentage 2017-2021

Partner country (suppliers)	Import quantity (kg)
Portugal	16,252,391
Spain	13,986,266
Namibia	5,287,015
France	3,810,603
Croatia	3,167,992

Table 20 EU27 import quantity of other sharks, top five supplying partners 2017-2021



- Italy 25,5%
- Portugal 21,8%
- Spain 19,1%
- Brazil 17,4%
- Germany 4,6%
- Rest 11,6%

Figure 13 Top five other sharks export partners (receivers) by percentage 2017-2021

Partner country (receivers)	Export quantity (kg)
Italy	13,573,320
Portugal	11,585,432
Spain	10,167,333
Brazil	9,232,662
Germany	2,468,782

Table 21 EU27 export quantity of other sharks, top five receiving partners 2017-2021



Photo: © Stan Sheeh

Illegal trade

The illegal trade data analysis draws on shark seizure data from the EU Trade in Wildlife Information eXchange (EU-TWIX) database. Illegal trade data implicating EU Member States were extracted from the EU-TWIX database on 22 April 2022 for the period between 1 January 2017 and 31 December 2020. The data covers the class Elasmobranchi (cartilaginous fishes including sharks and rays). This information is not publicly available for scrutiny but was made available to IFAW following authorisation from 26 EU Member States²³. Analysis of seizures was conducted to provide an insight into the illegal shark trade involving the EU (and its overseas territories). However, the limited amount of seizure data in EU-TWIX prevents the kind of detailed analysis that might otherwise be possible to fully investigate the main commodity types involved, trade routes, locations and trafficking methods. Where information was available, commodity groups were analysed in terms of number of specimens, weight and/or volume.

In total there were 30 seizures of shark specimens or derivatives thereof recorded in the EU-TWIX database. The majority did not specify which species it concerned, rather they were simply registered under the common name category 'Sharks' species (Table 22). Often, products are seized with the suspicion that they concern a protected species, but the officer on duty is not able to identify the exact species, so at that point the species is recorded as unknown. A specialist will be involved and confirms at a later stage that it does in fact concern a CITES-listed protected species. The original seizure is registered under 'Sharks' as a common name and no other details are registered under the columns for order, family, genus or species, hence the classification 'Unknown' in the table on the right.

Figure 14 shows the number of seizures per year. When looking at the period 2017-2020, most seizures took place in 2020 and seizure records have increased since 2018.

Seizure records by order and family

Order	Family	Total
Carcharhiniformes		0
Lamniformes	Alopiidae	4
	Lamnidae	11
Orectolobiformes	Rhincodontidae	1
Unknown*		14
Total		30

Table 22 Number of seizure records of shark specimens between 2017 to 2020.

*Order unknown but mentioned in column 'common name' as 'Sharks'²⁴

Seizure records per year

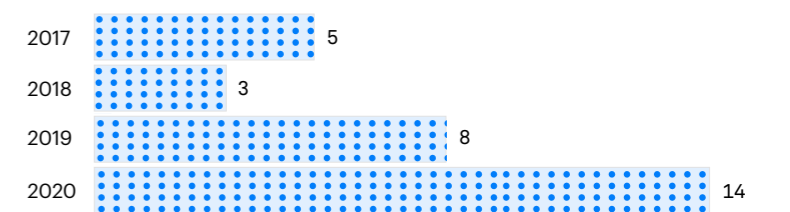


Figure 14 Number of seizure records of shark specimens or derivatives per year

▲ Closeup of a bag with dried shark upper caudal fins being sold in Asia at a seafood market in Hong Kong SAR, China

◀ Bonnethead shark.

Most seizures took place in France (14), followed by Estonia (8; *Figure 15*). Most seizures involved 'Bodies' and 'Cosmetics', while five seizures involved 'Bones' (*Table 23*).

Seizure numbers can indicate a higher level of illegal trade activities taking place in certain countries or that more products are transited through those countries, but it could also signal stronger enforcement efforts by certain countries. Significant seizures are detailed below:

Teeth

- ▶ Import of 900 teeth (of sharks) sent from the [United States to France](#) and found in airmail parcel in French mail centre.
- ▶ 35 teeth of porbeagle and 14 teeth of common thresher seized at a fair in [Vernon, France](#).

Bones

- ▶ Seizure of 108 bones of porbeagle shark seized at a fair in [Vernon, France](#).

Bodies

- ▶ Seizure of 26,220 kg of bodies of shortfin mako in the [Netherlands](#) at the port of [Rotterdam](#) in a transit shipment from [Namibia](#) to [Spain](#).
- ▶ 464 kg of bodies of porbeagle and 179 kg of shortfin mako seized at Charles de Gaulle airport in [France](#) in a transit shipment from [Senegal](#) to [Italy](#).

Medicine

- ▶ Seizure of 4.694 kg of shark cartilage in a shop in [Estonia](#) with [Russia](#) as country of origin.

Fins

- ▶ 5.7 kg of dried shark fins, species not mentioned, were seized at Airport Orly in [France](#) with [Senegal](#) as country of origin.

Trophies

- ▶ 29 trophies of sharks were seized at Charles de Gaulle airport in [France](#) in a transit shipment coming from the [Dominican Republic](#) and destined for [Hong Kong SAR](#).

Of 26 EU Member States which supplied seizure data for this study, the results show that only nine Member States have recorded seizures during the four-year period between 2017 and 2020: [Croatia](#), [Estonia](#), [France](#), [Germany](#), [Italy](#), [Lithuania](#), [Netherlands](#), [Poland](#) and [Spain](#).

Those nine Member States reported during the four-year period a total of 30 shark-related seizures. It should be specifically noted that only one seizure of shark fins was recorded in the EU-TWIX database. To complement the (potential lack of) information as registered by the Member States, a limited search of open source information was undertaken to identify examples of media articles highlighting seizures of shark fins and meat across the EU or on EU-operated vessels that have not been recorded in the EU-TWIX database (see following section).

Regarding the registered locations in the EU-TWIX seizure data, it is significant to note that only three out of the 30 seizures were registered to have taken place at the location of 'maritime port'. One is mentioned in the significant seizures' list as the seizure of 26,220 kg of short fin mako bodies at the port of [Rotterdam](#) in the [Netherlands](#). The other seizures registered to have taken place at a 'maritime port' were carried out by authorities from [France](#) (seizure of one whale shark skeleton) and [Italy](#) (seizure of one shortfin mako body).

This is concerning because the vast majority of shark products are moved by sea, and maritime routes are the most heavily relied upon mode of transport for illegal wildlife trade.

Seizures 2017-2020

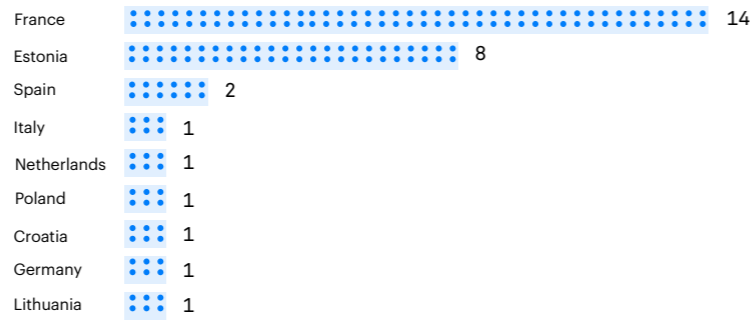


Figure 15 Number of seizure records of shark specimens or derivatives per year period 2017-2020.

Number of seizures by code, country and species²⁵

Code	Records	Country	Number of seizures	Species involved
Body (BOD)	7	France	4	179 kg of shortfin mako 4 bodies of unspecified protected shark species 464 kg and 1 body of porbeagle shark*
		Netherlands	1	26,220 kg of shortfin mako bodies*
		Spain	1	1 body of common thresher*
		Italy	1	1 body of shortfin mako*
Cosmetics (COS)	7	Estonia	7	14 packages (650 grams + 0.375 litres in total) of cosmetic product containing cartilage from unspecified protected shark species
Bone (BON)	5	France	3	4 bones of common thresher 108 bones of porbeagle shark* 1 shortfin mako
		Poland	1	1 great white shark
		Croatia	1	1 shortfin mako
Teeth (TEE)	3	France	3	900 teeth of unspecified protected shark species* 35 teeth of porbeagle shark 14 teeth of common thresher
Medicine (MED)	2	Lithuania	1	Medicines containing unspecified protected shark species (0.525 litre divided in 6 jars)
		Estonia	1*	4.694 kg of shark cartilage (unspecified protected species)
Extract (EXT)	1	Germany	1	60 packages of extract containing great white shark
Fin (FIN)	1	France	1	5.7 kg fins of unspecified protected shark species*
Skeleton (SKE)	1	France	1	1 skeleton of unspecified protected shark species
Skin piece (SKP)	1	France	1	1 skin piece of whale shark
Trophy (TRO)	1	France	1	29 trophies of unspecified protected shark species*
Whole (WHO)	1	Spain	1	1 whole common thresher

Table 23 Amount of seizure records per code between 2017 and 2020. The used codes are stated in the latest Reference Guide to the European Union Wildlife Trade Regulations (December 2020). * = significant seizure: Significant seizures are those seizures with a notably larger number of items, product, kilograms etc.

For example, [Hong Kong SAR](#) serves as the main shark trade hub, handling anywhere from 50% to 80% of the world's shark fin trade. Over 90% of these imports come into [Hong Kong SAR](#) by ship. Statistics from the Hong Kong Government Census & Statistics Department show that in 2015, 5.2 million kg of shark fin was brought into [Hong Kong SAR's](#) harbours by ship²⁶. A 2017 publication also points at ocean transportation as the most important transportation mode for shark fin imports into and re-exports from [Hong Kong SAR](#)²⁷ and states 'The main mode of transport into [Hong Kong](#) has been, and continues to be, by sea'.

A more recent publication²⁸ investigating the "Pandemic-Adjusted" world and wildlife seizures in 2022 signalled that the increased weight of seized wildlife shipments transported by sea 'may point at an increased reliance on maritime cargo by traffickers as illicit wildlife trafficking operations resume and navigate around lingering restrictions to other transportation methods, such as a reduced number of passenger flights'. The author adds "In the year ahead, it is essential to continue monitoring the role of the maritime sector in transporting illicit wildlife".

Media articles

Earlier publications have noted that seizure data is not always submitted by Member States in a consistent manner²⁹. Problems related to the reporting vary, e.g., a lack of enforcement capacity, setting of priorities or interpretation of the requested data reporting format. Seizure numbers are also considered to be only the tip of the iceberg, as it is commonly assumed that these recorded seizures represent approximately 10% of the actual illegal trade taking place³⁰.

50-80%

of the world's shark fin trade come through [Hong Kong SAR](#) serving as the main shark trade hub

>90%

of those fin imports come into [Hong Kong SAR](#) by ship



▲ Hundreds of shark dorsal, pectoral, and caudal fins drying out on a rooftop of an industrial building in Kennedy Town, Sai Wan, Hong Kong SAR, China. These fins are being processed to be sold in the lucrative shark trade in Asia.

Table 24 shows examples of articles reporting on seizures that have not (yet) been submitted to the EU-TWIX database. These examples are merely intended to illustrate that not all seizures are recorded in the EU-TWIX database, yet these illegal activities represent a significant economic value and further threaten the different shark species affected by this trade. This overview cannot be considered exhaustive for the seizures potentially taking place throughout the EU.

Number of seizures by order and family

Seizure	Seized items	EU Member State involved	Other countries/territories involved	Year
Frankfurt/Germany airport seizure ³¹	3,000 kg incl. 400 kg of fins (oceanic whitetip, silky shark)	Seizure authorities: Germany	Mexico, Hong Kong SAR	2018
Amsterdam/Netherlands airport seizure ³²	Approx. 3,000 fins (217 kg) of hammerhead sharks	Seizure authorities: Netherlands	Cuba, Hong Kong SAR	2019
Brussels/Belgium airport seizure ³³	1,200 kg of shark and ray fins	Seizure authorities: Belgium	Liberia, Hong Kong SAR	2019
Malta shop seizure ³⁴	24 shortfin mako	Spain	X	2019
Spanish vessel seizure in French Polynesia ³⁵	26 kg of shark teeth, 20 kg of shark fins, 200 g of shark vertebra	Spain Seizure authorities: French Polynesia	X	2020
Portuguese vessels seizures ³⁶	Two seizures; 83 shark fins and 21 kg of shark meat, and 264 kg of meat from deep sea sharks	Portugal	X	2021*
Italy shop seizure ³⁷	26 kilos of shark meat (blue shark)	Italy	X	2021*

Table 24 Overview of media articles highlighting seizures, that were not recorded in the EU-TWIX database, of protected shark species. *These seizures are not highlighted in the EU-TWIX section as the EU-TWIX data provided by authorities for this report covers only the period 2017-2020.

Discussions & Recommendations

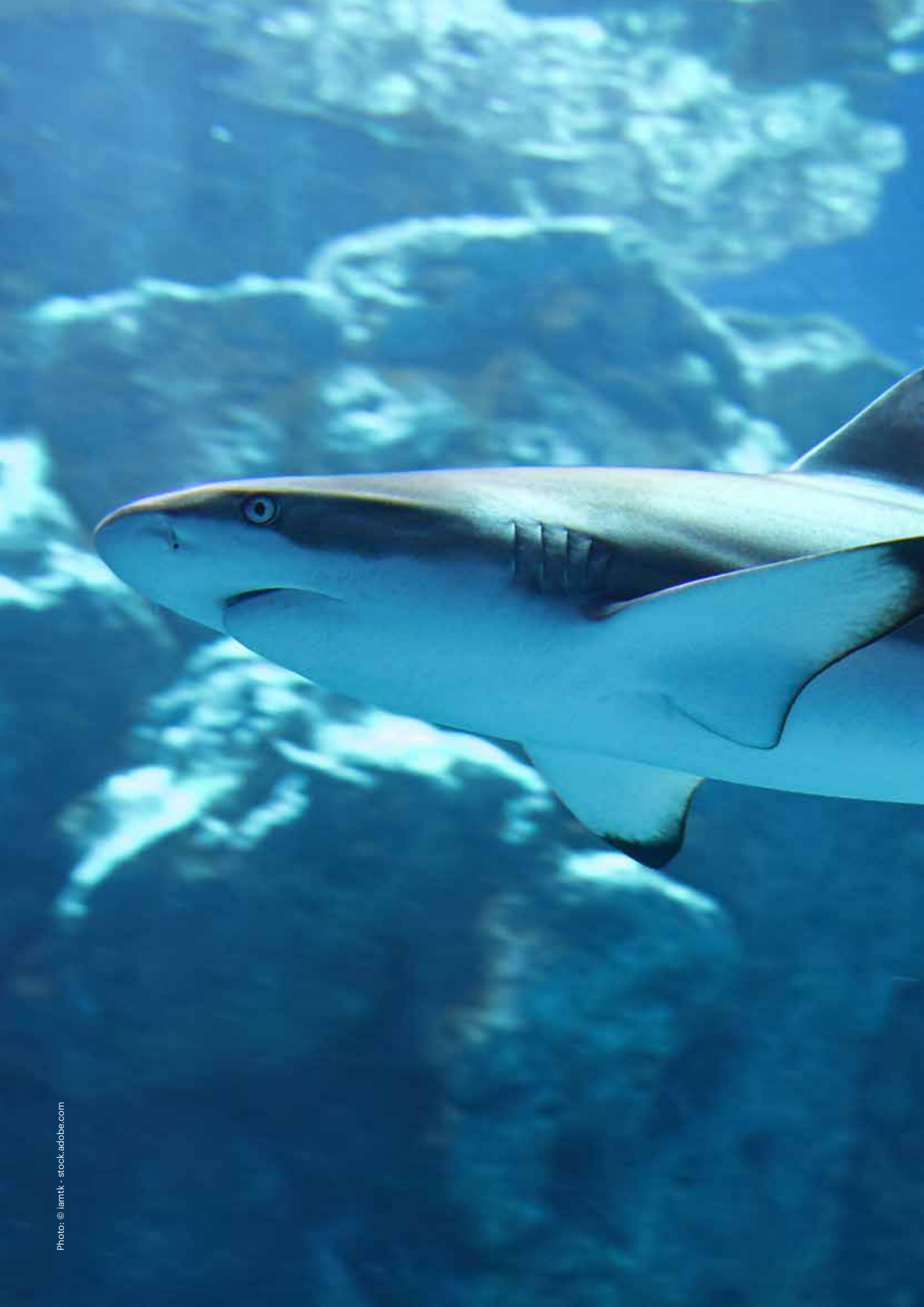




Photo: © Shane Gross

Discussions

This report is based on the analysis of both the *legal trade data* as reported by the 27 EU Member States between 2017 and 2021, and *illegal trade data* as registered by the Member States in the EU-TWIX database between 2017 and 2020. In researching both these datasets, this study presents a comprehensive picture of the main players and trade partners based on the EU's own data, as well as the economic value of the trade, while also providing an insight into the illegal trade activities taking place within the EU.

Importance of the meat trade in addition to the trade in fins

The total quantities of shark meat and fins traded by EU Member States between 2017 and 2020 are staggeringly high; 161,880,906 kg was imported as fins and meat, and 169,261,443 kg was exported. IFAW's 2022 report *Supply and Demand: the EU's role in*

the global shark trade showed high numbers of fins supplied by the EU into the main Asian trade hubs. That report was based on customs data from those trade hubs and registered predominantly import of fins from the EU. This report complements those figures by also highlighting the significant trade of meat-related products both imported into and exported by the EU. While the economic value of the fin export is relatively much higher for the smaller quantities that are traded, the economic value of the meat trade is considerable.

The data seems to indicate that trade in piked dogfish and catsharks, as well as porbeagle shark, and a considerable amount of meat from sharks which are not specified (category 'other sharks') takes place within the EU. Blue shark, by contrast, while still traded in the EU in large amounts, is also exported at high levels to supply markets outside of the EU.

For imports, the meat trade constitutes 45 times the economic value of fin imports, as most fin products are exported to Asian trade hubs. The export of shark meat represents double the value of the fin export, although as noted before, given the smaller quantities of fins traded, they are still far higher in value per kilogram (€13.87 per kg for fins to €2.18 per kg for meat). Similarly, from a conservation perspective, the lower fin trade numbers should be interpreted with caution. One kilogram of shark fins does not represent the same amount of dead sharks as one kilogram of shark meat; a shark fin weighs on average only 2% of a shark's whole weight. Hence a kilogram of fins represents many more dead sharks than a kilogram of meat.

- ▲ Gray reef shark swimming on Father's Reef, Papua New Guinea.
- ▶ Raja undulata and catsharks.



Significant traders

Overall, the data shows that several EU Member States play a very significant role in the international shark trade; [Spain](#) and [Portugal](#) are significant players as they are among the top five countries for all trade in both shark fins and shark meat. The EU internal trade, with other EU Member States as trade partners, is responsible for a large chunk of the reported trade as well. The shark meat trade data suggests there is a large internal market in the EU and/or products are processed there for re-export. In any case several EU Member States make a profit from the trade and Spain and Portugal appear to play an unevenly large role. The respective non-EU trade partners are different when looking at the fin trade and the meat trade; fins are mainly exported to Asia ([Singapore](#), [mainland China](#), [Hong Kong SAR](#) and [Taiwan province](#)), whereas meat is exported to a variety of countries both in and outside the EU ([Spain](#), [Portugal](#), [Italy](#), [Brazil](#) and [Morocco](#)).

Limited trade information

While trade data allows for distinction between some types of products (fins, meat), and identifies suppliers and receivers of these products, there are still significant limitations. As there are no specific codes differentiating the species behind the traded fins, it is not possible to determine whether fins originate from sharks which are endangered and/or have a protected status. Also, no specific HS code exists for shark

cartilage products, but seizure data revealed that shark cartilage is traded as a derivative in products advertised as medicines. For a comprehensive picture of ongoing trade, additional customs HS codes would need to be created and/or utilised in a consistent manner by trading partners worldwide. However, a comprehensive revision of HS codes can take years to complete, therefore urgent implementation of CITES listings is key in the meantime.

When a shark species is listed on CITES, international trade may only continue with the appropriate permits issued by national authorities, to ensure that trade levels are limited to sustainable levels and products are legally sourced. Therefore, through this permitting system, the listings of additional shark species on CITES should provide more trade data and overall, a better insight into trade movements, provided CITES permitting data is recorded accurately and reported in a timely manner. It will enable the collection of detailed information on how

threatened shark species are traded by countries/territories and, through increased traceability, should lead to better data on the implementation and effectiveness of any enacted sustainable fishing limits for highly traded species, in turn signalling where better enforcement is needed.

A worldwide coalition of NGOs, including IFAW, continues to be involved with the implementation of CITES shark listings by providing support to governments through the development of identification tools, trainings on shark product identification and how to conduct CITES Non-Detriment Findings, and enforcement training. However, effective implementation is dependent on the efforts and funding of these procedures by governments which are looking to continue the trade in listed species. Dedicated funding should be earmarked for the implementation of the new listings.

Reporter(s) / Partner(s): EU27 / All partners	Total import qty (kg)	Total import value	Total export qty (kg)	Total export value
Shark fins	1,004,099	€8,085,598	12,761,166	€176,984,297
Shark meat	160,876,807	€366,810,323	156,500,277	€341,318,806
Total	161,880,906	€374,895,921	169,261,443	€518,303,103

Table 1 (reproduced) EU27 total import and export of shark fins and meat

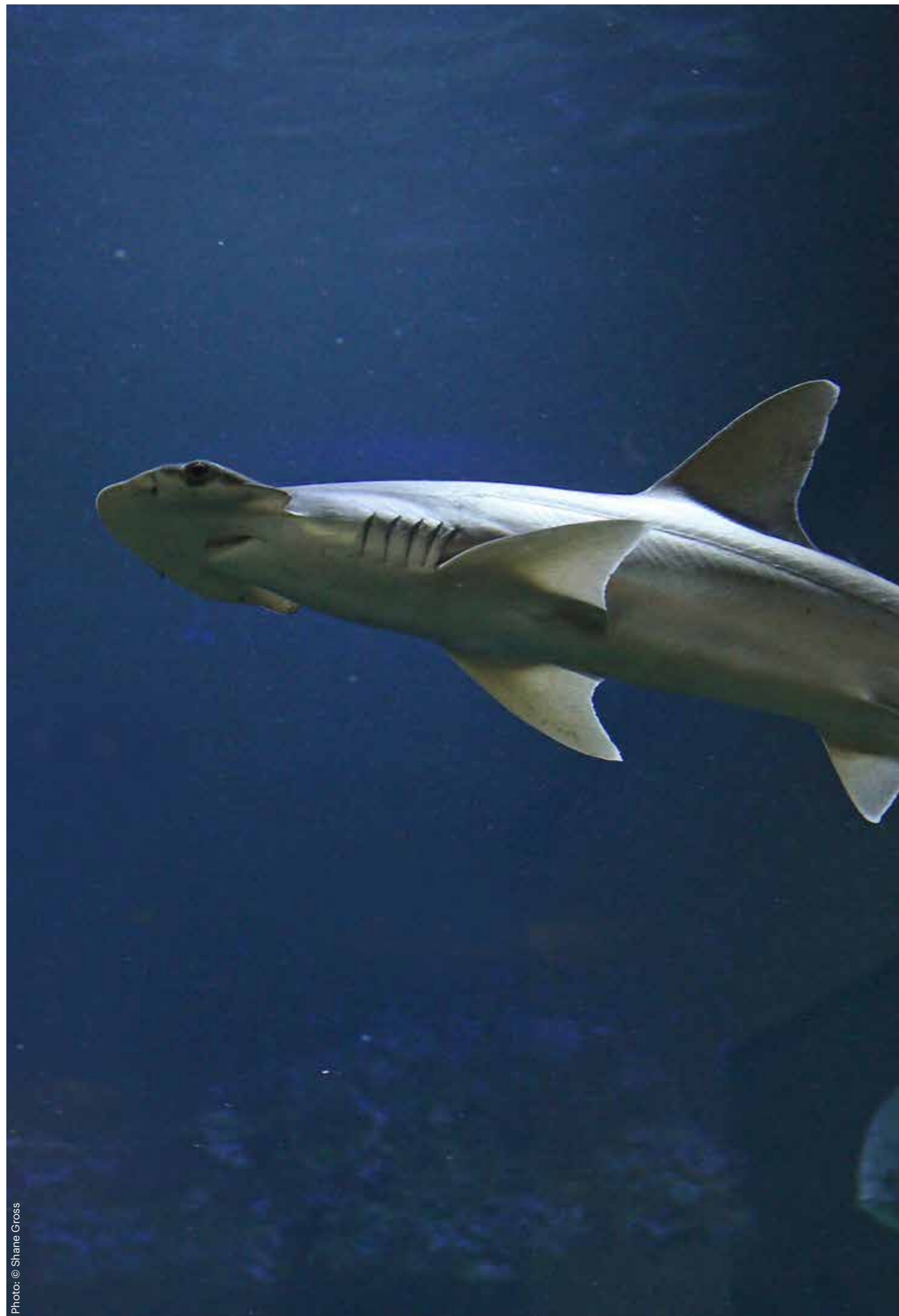


Photo: © Shane Gross



Photo: © Stan Shea

Lack of illegal trade reporting

The inconsistency between seizures as reported in the EU-TWIX database and media articles illustrates that the scale of illegal trade can be much larger than that observed in the official data and highlights the need for the use of multiple sources. Although effort by those authorities that have provided data is welcome, there are still significant steps to be taken for all-inclusive data reporting. Of the 30 seizures that are reported in EU-TWIX, two of the 27 EU Member States (France and Estonia) alone are responsible for 73% (22 out of 30) of the total number of seizures. This is highly unlikely to be a true reflection of the dynamics of illegal shark trade in the EU and shows how limited reporting can distort conclusions when these are based entirely on the registered data.

The lack of reporting, when contrasted with simple open source media searches, supports the suspicion that the EU's role in illegal shark trade is larger than reflected in the officially registered number of seizures. The small quantity of seizures compared to the significant quantities involved in EU shark product trade suggest that EU Member States are not sufficiently reporting on seizures of shark products and/or do not focus enforcement efforts on the detection of shark products. Increased enforcement efforts are required, especially now that there will be increased trade regulation as a result of additional shark species being listed on CITES at CoP19 in November 2022.

Similarly, it seems unlikely that the seizure data gives a complete view of the scale of the illegal trade in shark fins, as there is only one seizure of fins recorded in the period

2017–2020 according to the EU-TWIX database. By contrast, the seizure in 2018 at Frankfurt Airport of 3,000 shark fins was not recorded in EU-TWIX, but rather was highlighted in a report by Sharkproject International to whom the fins were handed over by German authorities for educational purposes³⁸.

Furthermore, the lack of proper identification of the affected shark species demonstrates challenges facing enforcement authorities. Out of the 30 seizures, there were 14 seizures registered under the common category of 'Sharks', lacking basic information on which species the seizures related to, making it difficult to extract useful conclusions and/or follow-up action. Enforcement authorities will need to be trained in identification tools and registration for better monitoring of both the legal and illegal trade.

Also of note is that the biggest seizure recorded by an EU Member State was the seizure of 26,220 kg of shortfin mako shark by the Netherlands in a transit shipment from Namibia to Spain. Several other significant seizures were *transit shipments* (i.e., intercepted by an EU Member State which was neither the country of origin nor the destination country). This indicates that the EU provides a platform for transit of illegal trade and therefore extra scrutiny is needed by enforcement authorities, not solely of Member States' markets but also where it concerns the EU facilitating the transit of shark products through ports and airports. Finally, although most shark fins are traded upon landing and shipped in large container shipments, only three out of 30 EU-TWIX registered seizures were registered with the location 'maritime port'. Considering that the transport of shark products mostly

takes place through container shipping, one would expect a considerably higher number of seizures registered at maritime ports. This suggests very little of the limited enforcement effort taking place is happening at maritime ports, where the vast majority of shark trade shipments happen.

Therefore, a greater focus is required on investigations and capacity building of relevant authorities in maritime ports.

While the EU and its Member States should be applauded for recognising the role of international trade, including their own, in the plight of shark species and supporting protections for further shark species at CITES CoP19, increased trade regulation through listings of additional shark species on CITES Appendix II is not enough; countries will also need to seriously step up their enforcement efforts.

Environment Commissioner Virginijus Sinkevičius from the European Commission stated during the public hearing on the European Citizens' Initiative 'Stop Finning - Stop the Trade' (March 27, 2023) that he shared the concern at lack of reporting by Member States on the shark trade, and that there is a strong need for fisheries control. The new CITES listing should improve the monitoring and transparency of the trade in many more species. However, enforcement of the listings plays an important role in preventing the trade from continuing illegally.

▲ Packaged dried shark fins (bottom) and dried mushrooms being sold at a retail storefront market in Kowloon, Hong Kong SAR, China

◀ Bonnethead shark.

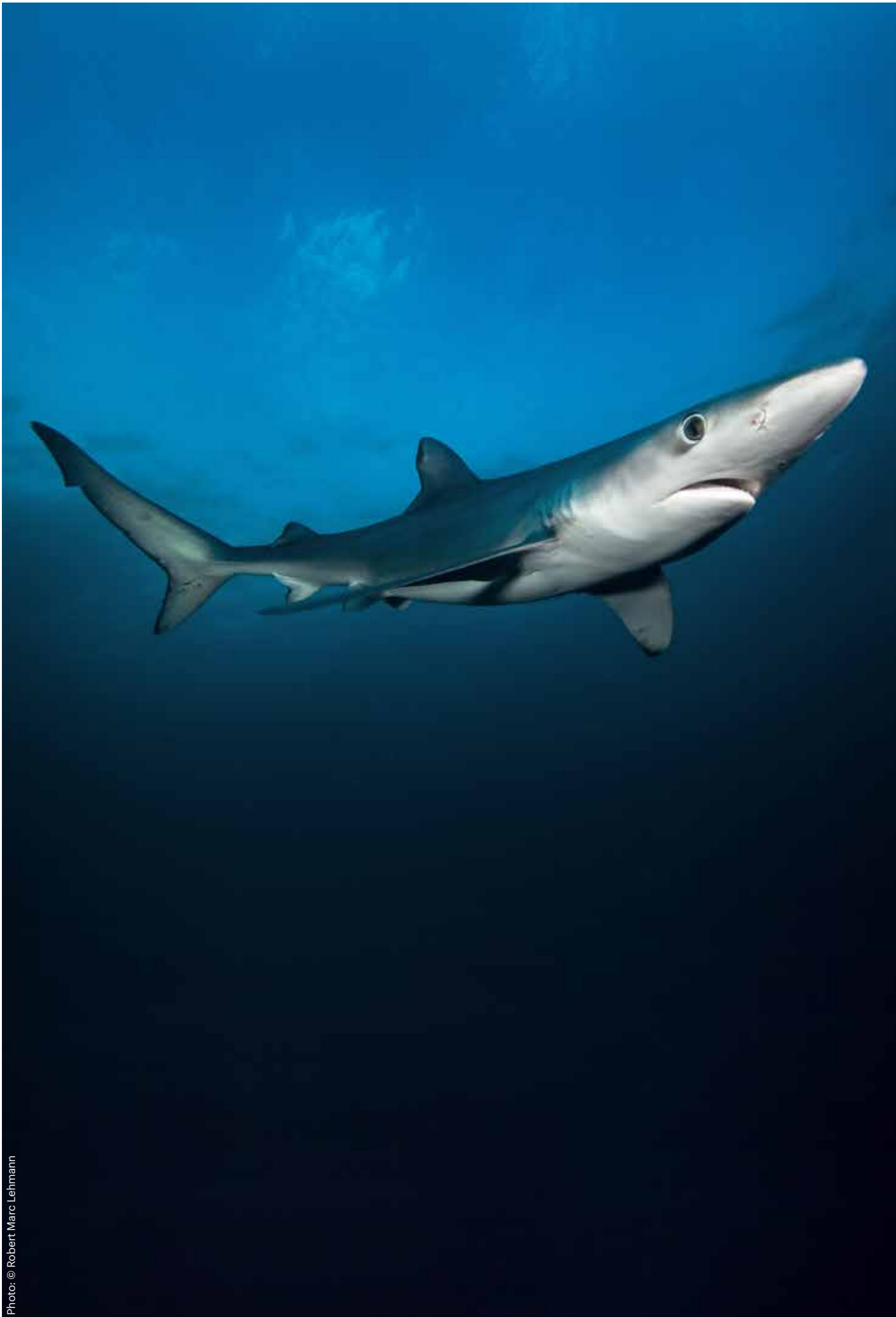


Photo: © Robert Marc Lehmann



Recommendations

Below we elaborate on recommendations for the EU, and equally relevant to other CITES Parties, to set the global tone for efficient implementation and enforcement of CITES shark listings, as additional efforts are needed to combat illegal trade in shark products, and reforms are needed to improve the tracking of shark products traded internationally. Collectively, if implemented, these recommendations can make a significant contribution to preventing the widespread extinction of sharks.

1. Prioritise the use of trade data to combat illegal wildlife trade in sharks and shark products

In order to make effective use of trade data to help enforce shark protections, the EU and its Member States should:

- ▶ Consistently record all seizures in the EU-TWIX database and other seizure databases as maintained by authorities from CITES Parties in a timely fashion;
- ▶ Increase enforcement capacity to detect and record the illegal trade in shark products, with a focus in particular on maritime ports, and through the organisation of dedicated shark product identification trainings for enforcement authorities to ensure that species information is properly and timely registered in the EU-TWIX database;
- ▶ Share trade data in cross-national platforms to enable the better coordination of intelligence between border checkpoints at the international level, particularly with relevant key trading partners;

- ▶ Make intelligence from seizures accessible to trading partners, to increase the chances of transnational enforcement action and to further understanding of the scale, key players, trade routes and patterns in the illegal trade.

2. Improve the quality of trade monitoring

In order to improve the quality of monitoring of the trade in shark products and ensure data guides enforcement action, governments should:

- ▶ Expand the HS codes to differentiate between the status of the traded species and the specific species of traded shark fins, and update the HS codes for meat to include the additional CoP19-listed shark species for species info;
- ▶ Create a specific HS code for cartilage products;
- ▶ Review the HS commodity codes for shark products and standardise code use with key trading partners;
- ▶ Encourage collaboration and sharing of trade data between trade officials and enforcement authorities.

3. Implementation of CITES shark listings and capacity building

Recognising that any reform of customs HS codes will likely take considerable time, immediate focus should be on the full and effective implementation of CITES shark listings, including newly-

listed species at CITES CoP19. To this end, the EU and its Member States should:

- ▶ Organise implementation workshops for authorities, with the necessary funding provided by the EU and Member States, to become familiar with new and existing listings, including CITES Management and Scientific Authorities to ensure CITES legality and sustainability requirements are being met, enforcement authorities to understand CITES requirements and identify shark products accurately, and authorities responsible for monitoring trade data to build capacity to accurately capture and report trade data;
- ▶ Use data from this report as a baseline to evaluate whether the new listings result in increased trade data entries;
- ▶ Evaluate the significant levels of catch and trade of CITES-listed shark species by EU Member States to ensure these meet CITES sustainability requirements.

▲ Fishers unloading boxes of small blue sharks captured by a surface longliner in the Port of Vigo, Galicia, Spain.

◀ Blue shark.

Acknowledgements, References, End notes & Annexes





Photo: © Stan Shea

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▲ A retail dry seafood market selling an assortment of wildlife products, including shark fin products in Kowloon, Hong Kong SAR, China.



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▲ Eight pallets with blue sharks captured by surface longliners and sold at the port of Vigo, Galicia, Spain.

End notes

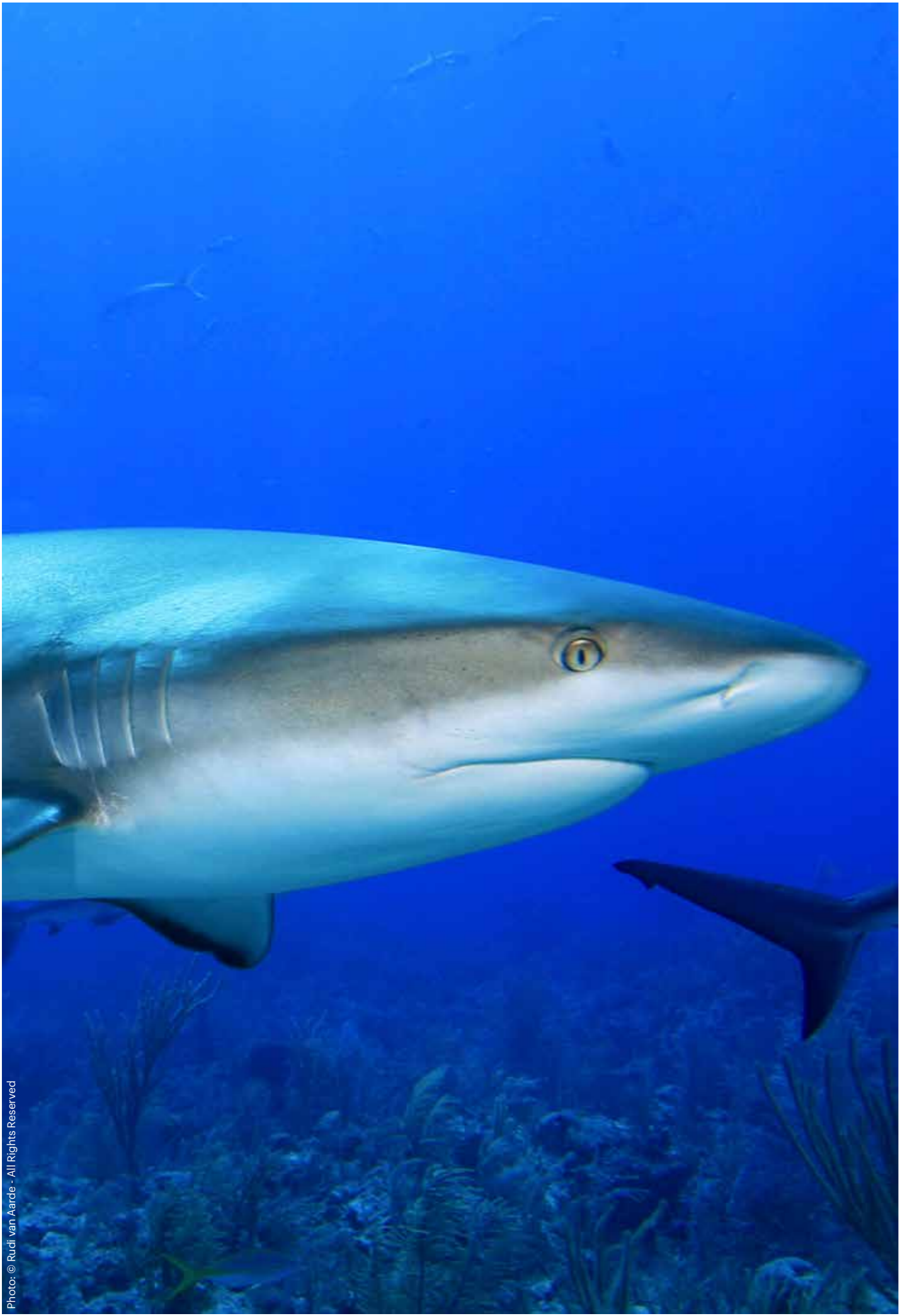


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- Hungarian authorities didn’t respond to the official request to provide seizure data of shark products between 2017 and 2020 before the indicated deadline for the data to be taken into account in the analysis.
- Sometimes products are seized with the suspicion that they concern a protected species, but the officer is not able to identify the exact species. A specialist will be involved and confirms at a later stage that indeed it concerns a protected species. The original seizure is registered as ‘Sharks’ and no other details are registered under the columns for order, family, genus or species.
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- Information gathered through email exchange with Sharkproject International on 19 September 2022.
- The data was extracted on 22 August 2022 prior to the listing of the additional 97 shark species in Appendix II at CITES CoP19 in Panama (November 2022). This study could therefore be considered a baseline measurement of reporting before the new shark and ray listings have all come into force (25 November 2023).

◀ Caribbean reef shark.



Photo: © Tom Burris



Photo: Namey / © IFAW

Annex 1

In this report we downloaded the trade data from <https://trade.ec.europa.eu/access-to-markets/en/statistics> using the following Harmonized System codes for shark products:

Shark fins

Fresh or chilled	030292
Fish Frozen	030392
Dried fish	030571

Shark meat

Blue shark (*Prionace glauca*)

Fresh or chilled	03028140
Frozen	03038140
Fresh or chilled fillets	03044730
Other meat fresh chilled	03045630
Frozen fillets	03048818
Other meat frozen	03049630

Piked Dogfish (*Squalus acanthias*) and catsharks (*Scylliorhinus spp*)

Fresh or chilled	03028115
Frozen	03038115
Fresh or chilled fillets	03044710
Other meat fresh chilled	03045610
Frozen fillets	03048811
Other meat frozen	03049610

Porbeagle shark (*Lamna nasus*)

Fresh or chilled	03028130
Frozen	03038130
Fresh or chilled fillets	03044720
Other meat fresh chilled	03045620
Frozen fillets	03048815
Other meat frozen	03049620

Other sharks

Fresh or chilled	03028180
Frozen	03038190
Fresh or chilled fillets	03044790
Other meat fresh chilled	03045690
Frozen fillets	03048819
Other meat frozen	03049690

▲ A stack of catsharks.

◀ An oceanic whitetip shark at night.

Annex 2

This report is about the trade in products from shark species according to the following scientific classification:

Kingdom: Animalia
Phylum: Chordata
Class: Chondrichthyes,
Subclass: Elasmobranch
Superorder: Selachimorpha

Orders: Common name:

Carcharhiniformes	ground sharks
Heterodontiformes	bullhead sharks
Hexanchiformes	cow sharks
Lamniformes	mackerel sharks
Orectolobiformes	carpet sharks
Pristiophoriformes	saw sharks
Squaliformes	dogfish sharks
Squatiformes	angel sharks

Protected sharks

There were 11 shark species and one genus (covering three species) of sharks protected under CITES and EU Regulation 338/97 (EU Wildlife Trade Regulation) at the time of data extraction³⁹.

Documentation is required for the import, export and (re-)export of specimens of Annex B-listed species into/from the EU. EU rules on import of Annex B-listed species are stricter than under CITES as import permits are required (in addition to export permits) for the import of such specimens and their derivatives into the EU, while under CITES an export permit is sufficient.

Source: <https://cites.org/eng/prog/shark/history.php>

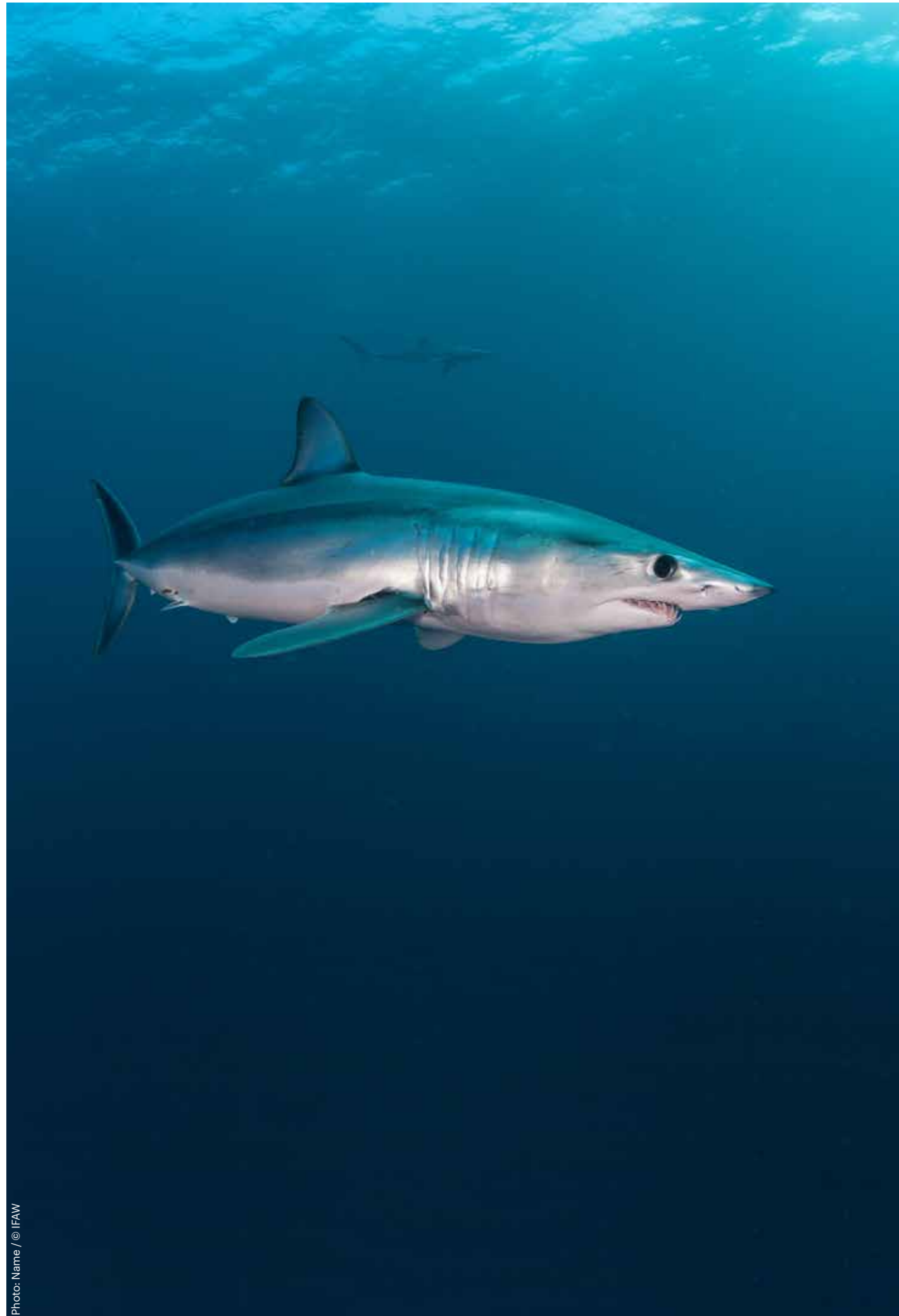
Carcharhiniformes	Common Name	Protection status	Since
<i>Carcharhinidae</i>	requiem sharks		
<i>Carcharhinus falciformis</i>	silky shark	CITES App II / EU Annex B	4-10-2017
<i>Carcharhinus longimanus</i>	oceanic whitetip shark	CITES App II / EU Annex B	14-9-2014
<i>Sphyrnidae</i>	hammerhead sharks		
<i>Sphyrna lewini</i>	scalloped hammerhead	CITES App II / EU Annex B	14-9-2014
<i>Sphyrna mokarran</i>	great hammerhead	CITES App II / EU Annex B	14-9-2014
<i>Sphyrna zyggena</i>	smooth hammerhead	CITES App II / EU Annex B	14-9-2014

Lamniformes	Common Name	Protection status	Since
<i>Alopiidae</i>	thresher sharks		
<i>Alopias spp.</i>		CITES App II / EU Annex B	4-10-2017

The genus of Alopias 3 species			
<i>Alopias pelagicus</i>	pelagic thresher	CITES App II / EU Annex B	4-10-2017
<i>Alopias superciliosus</i>	bigeye thresher	CITES App II / EU Annex B	4-10-2017
<i>Alopias vulpinus</i>	common thresher	CITES App II / EU Annex B	4-10-2017
<i>Cetorhinidae</i>	basking sharks		
<i>Cetorhinus maximus</i>	basking shark	CITES App II / EU Annex B	13-2-2003
<i>Lamnidae</i>	mackerel sharks		
<i>Carcharodon carcharias</i>	great white shark	CITES App II / EU Annex B	12-1-2005
<i>Isurus oxyrinchus</i>	shortfin mako	CITES App II / EU Annex B	14-9-2014
<i>Isurus paucus</i>	longfin mako	CITES App II / EU Annex B	14-9-2014
<i>Lamna nasus</i>	porbeagle shark	CITES App II / EU Annex B	14-9-2014

Orectolobiformes	Common Name	Protection status	Since
<i>Rhincodontidae</i>	whale sharks		
<i>Rhincodon typus</i>	whale shark	CITES App II / EU Annex B	13-2-2003

◀ A short fin mako shark.



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for Animal Welfare

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