



TRAFFIC
the wildlife trade monitoring network

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A RESPONSE TO TRADE IN

**HIGH VALUE
MARINE PRODUCTS
FROM AFRICA TO ASIA**

WITH A FOCUS ON SEA CUCUMBERS; FISH MAWS; AND SEAHORSES

Simone Louw

POLICY BRIEF

This short paper is based on a number of recently published TRAFFIC reports on the trade in high value marine products from Africa to Asia (Appendix 1):

- Seahorse Trade Dynamics from Africa to Asia
- A rapid assessment of the sea cucumber trade dynamics from Africa to Asia
- Maw Trade: A rapid assessment of the trade in fish swim bladders from Africa to Hong Kong SAR

The study was undertaken through the ReTTA (Reducing Trade Threats to Africa's wild species and ecosystems) project, which is funded by Arcadia—a charitable fund of Lisbet Rausing and Peter Baldwin.

ABOUT US



TRAFFIC is a leading non-governmental organisation working globally on trade in wild animals and plants in the context of both biodiversity conservation and sustainable development.

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DESIGN

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Dried seahorses and fish maws for sale in a shop in Hong Kong SAR



INTRODUCTION

DRIED MARINE PRODUCTS SUCH AS SEA CUCUMBERS, FISH MAWS AND SEAHORSES ARE HARVESTED TO SUPPLY THE **LUXURY DRIED SEAFOOD MARKET AND THE TRADITIONAL CHINESE MEDICINE (TCM) MARKET** ACROSS MANY ASIAN COUNTRIES.

Sea cucumbers and fish maws (dried swim bladders) form part of the same niche market as shark fin and abalone, all of which are valued as a status food or symbol of wealth. Dried seahorses, on the other hand, are harvested to supply TCM markets, where specimens are ground to powder and consumed directly as the sole ingredient or in combination with other products, to treat infertility, erectile dysfunction, and arthritis, amongst other ailments.

The high demand and high prices in destination markets drive the exploitation of these species within source countries, which are often characterized with poorly regulated fisheries and international trade. Furthermore, many impoverished fishing communities within source countries are dependent on the complex supply chains associated with dried marine products. In comparison with live and fresh seafood products in

international trade, dried seafood products are usually characterized by longer supply chains that include; harvesting, processing, drying, and storage of the dried product, making them relatively harder to regulate and monitor.

The rapid assessments for sea cucumber, fish maw, and seahorse trade from Africa to Asia evaluated the published customs data for these marine products, which provided insights into the key exporting and importing countries, the declared value of the trade, and any discrepancies in reporting of trade. A number of key African countries were identified as showing under-reporting of exports and poor implementation of trade regulations (including CITES where relevant), leading to the potential for illegal and unsustainable catch and trade.



MAURITANIA

HIGH LEVELS OF UNDER-REPORTING of sea cucumber exports, despite having the highest value sea cucumbers in Africa according to Hong Kong SAR customs data.



SENEGAL

KEY SOURCE FOR DRIED SEAHORSES to Hong Kong SAR despite a CITES trade suspension for *Hippocampus algiricus*.

- Second largest source for marine fish maws in Africa.



GUINEA

LARGEST SOURCE FOR MARINE FISH MAWS AND DRIED SEAHORSES IN AFRICA.

- Lack of implementing CITES export permits for seahorse trade.
- High levels of under-reporting of fish maw exports.



TOGO

KEY SOURCE FOR MARINE FISH MAWS IN AFRICA.

- Second largest source for marine fish maws.
- Highest value fish maws in Africa, averaging USD189/kg.
- High levels of under-reporting of export volumes.



SIERRA LEONE

KEY SOURCE FOR MARINE FISH MAWS.

- Fourth largest source country for marine fish maws in Africa
- High levels of under-reporting of export volumes



REPUBLIC OF THE CONGO

KEY SOURCE FOR MARINE FISH MAWS IN AFRICA.

- Second highest in terms of value for fish maws according to Hong Kong SAR customs data.
- High levels of under-reporting of export volumes.



SOUTH AFRICA

HONG KONG CUSTOMS DATA INDICATED IMPORTS OF 103,000 DRIED SEAHORSES WITH ZERO CITES EXPORT DATA REPORTED FROM ZA.

- *Hippocampus capensis*, endemic to South Africa, is prohibited from harvest and trade according to the National Biodiversity Act of 2004.
 - Key source for marine fish maws in Africa.
- High levels of under-reporting of export volumes, with cases of illegal sea cucumber and fish maw trade related to misdeclaration of consignments.



LAKE VICTORIA: UGANDA, TANZANIA, KENYA

TOP 3 SOURCE COUNTRIES for fish maws in Africa (*Lates niloticus*).

- High levels of Illegal, Unreported, and Unregulated (IUU) fishing.
- Significant under-reporting of export volumes with zero exports reported in case of Kenya.



KENYA

HIGH LEVELS OF UNDER-REPORTING of sea cucumber export volumes and illegal harvesting.



SEYCHELLES

HIGH LEVELS OF UNDER-REPORTING of sea cucumber export volumes.



TANZANIA

DIFFERENT SEA CUCUMBER MANAGEMENT

REGIMES created a trade network where smuggled sea cucumbers from mainland Tanzania (ban) enters legal trade in Zanzibar (no ban).



MADAGASCAR

OVERALL HIGHEST EXPORTER OF DRIED SEA CUCUMBERS IN AFRICA.

- Significant declines in export volumes in recent years.
- Second: High levels of under-reporting of export volumes and illegal harvesting taking place.



MOZAMBIQUE

INCREASING SEA CUCUMBER EXPORTS IN RECENT YEARS.

- Since 2019, the highest exporter of dried sea cucumbers in Africa.
- High levels of under-reporting of export volumes.

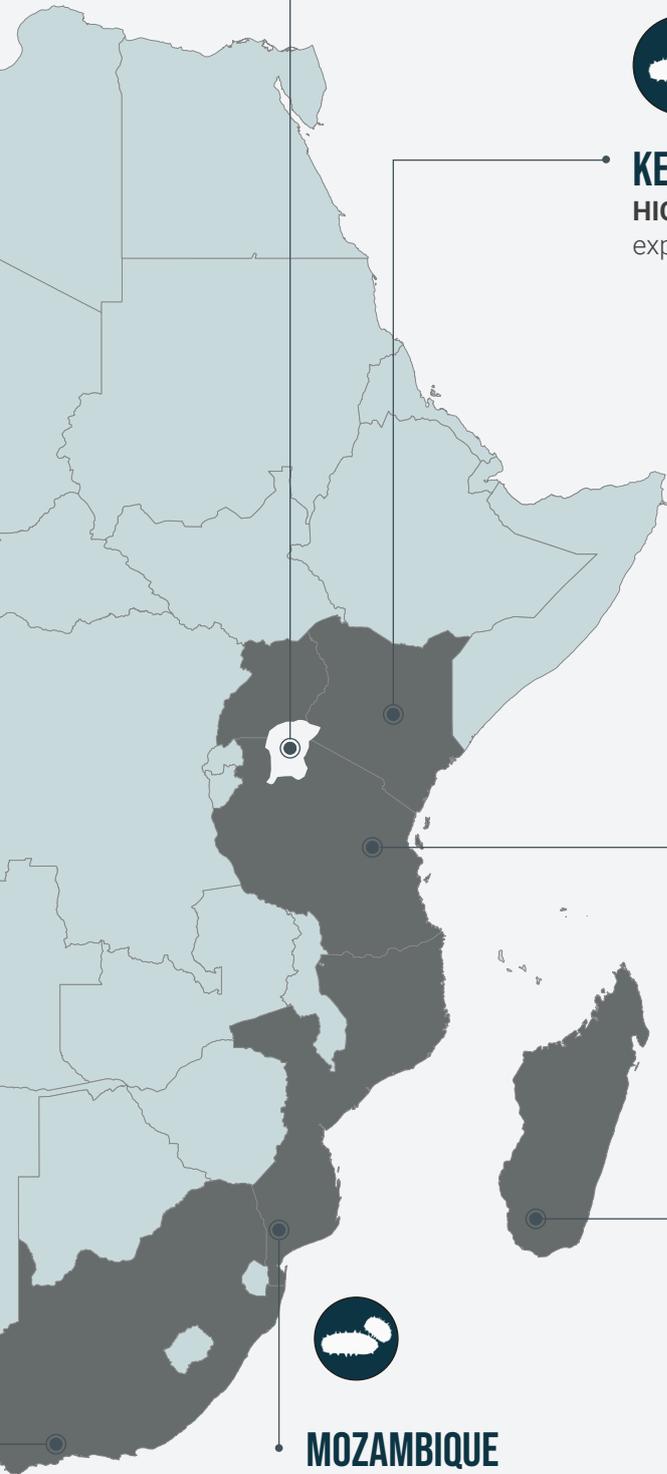


FIGURE 1

Key target countries identified from all three rapid assessments and the issues related to seahorse, sea cucumber and fish maw trade in Africa



Juvenile sea cucumbers at a hatchery



KEY FINDINGS AND RECOMMENDATIONS

SEA CUCUMBERS

ONLY 6 OF 33

African source countries for Hong Kong imports have reported dried exports in the last 10 years

1 POOR MONITORING OF SEA CUCUMBER TRADE IN AFRICA

There are a total of 33 source countries in Africa from which Hong Kong SAR imports dried sea cucumbers. Only six countries in Africa have reported exports of dried sea cucumbers to Hong Kong SAR over the last 10 years.

RECOMMENDATION: TRAINING ON CORRECT USE OF HS CODES

Customs officials across Africa, particularly East and Southern Africa countries, need to be made aware of the correct HS codes used for reporting dried sea cucumber exports and the potential loss of much-needed revenue associated with the high value trade when not reporting or using the incorrect HS tariff codes.

2 CITES IMPLEMENTATION OF APPENDIX II SEA CUCUMBER SPECIES

In terms of volume of the sea cucumber trade, key source countries are situated along the coastline of East and Southern Africa - the same region which encompasses the two newly listed CITES App II species: *Holothuria fuscogoliva* and *H. nobulis*.

RECOMMENDATION: IDENTIFICATION TRAINING OF NEWLY LISTED SPECIES

Target countries for related awareness raising and training of customs and fisheries officials in identifying the newly listed CITES App II species and subsequent granting of exports permits include: Kenya, Tanzania, Mozambique, South Africa, Madagascar, and Seychelles.

3 LACK OF IMPLEMENTING NATIONAL REGULATIONS

Inconsistencies between mainland Tanzania and the offshore island Zanzibar's legislation relating to sea cucumber catch and trade is creating a network of illegal and unregulated trade.

RECOMMENDATION: ACHIEVE CONSISTENCY IN LEGISLATIVE LANDSCAPE

Fisheries management authorities in Tanzania and Zanzibar should evaluate the regulations associated with sea cucumbers as there needs to be consistency in the legislative landscape to avoid illegal trade disguised as legal trade from Zanzibar.

4 ILLEGAL HARVEST AND TRADE

High levels of illegal harvesting due to the ease of collecting sea cucumbers along the coastline, with specific incidences recorded for Madagascar, South Africa, Kenya, Tanzania, and Mozambique.

RECOMMENDATION: STRENGTHEN ENFORCEMENT EFFORTS TO ADDRESS CRIMINALITY

Customs, fisheries and law enforcement officials in Madagascar, South Africa, Kenya, Tanzania, and Mozambique should be made aware of the potential mis-declaration of sea cucumber consignments and of the potential for illegal sourced sea cucumbers entering the international trade.



Dried fish maws for sale in Hong Kong



KEY FINDINGS AND RECOMMENDATIONS

FISH MAWS

HIGH VOLUMES

of marine fish maws exported from West Africa and lack species or population information

1 HIGH VOLUMES, HIGH VALUE, HIGH NUMBER OF COUNTRIES INVOLVED IN THE TRADE:

Fish maw trade follows the same trajectory and patterns as the international shark fin trade. The high number of countries supplying the demand for fish maw in Asia warrants improved monitoring of the global trade.

RECOMMENDATION: 6-DIGIT HS CODE FOR DRIED FISH MAWS

The creation of a separate 6-digit HS code for dried fish maws is needed, that only applies to dried fish maws and does not include fish heads and tails through established World Customs Organization (WCO) mechanisms.

2 HIGH VOLUMES OF MARINE FISH MAWS EXPORTED FROM WEST AFRICAN COUNTRIES

Fish species associated with the fish maw trade are harvested and traded in 35 countries across Africa, with no published information on the species harvested and associated impacts on population abundance and the wider marine ecosystem.

RECOMMENDATION: FURTHER INVESTIGATION INTO HARVEST SPECIES AND IMPACTS

Priority countries include; Guinea, Senegal, Sierra Leone, Togo and the Republic of the Congo for marine fish maws. Further investigation is required to better understand the fisheries involved, the species harvested, and the population impacts associated with the high volume trade.

3 FISH MAWS FROM LAKE VICTORIA

Driven by the demand for its high value meat and fish maws, the Nile Perch *Lates niloticus* is harvested at unsustainable levels in Lake Victoria, which threatens the social and economic benefits this species provides to the lake side communities of Uganda, Tanzania and Kenya. Exports of Nile Perch fish maws are severely under-reported by all three countries, making it very difficult to identify, monitor, and regulate the trade, particularly in the case of Kenya, where zero exports have been reported over the last 10 years, despite being one of the largest source countries in Africa.

RECOMMENDATION: ALERT CUSTOMS AND FISHERIES MANAGEMENT OFFICIALS

Customs and fisheries management officials in Uganda, Tanzania and Kenya need to be made aware of the under-reporting of export data for fish maws and the potential loss of much-needed revenue associated with this high value trade. The under-declaration of export volumes hinders trade monitoring and the future sustainability of the Lake Victoria Nile Perch fishery.



KEY FINDINGS AND RECOMMENDATIONS SEAHORSES

GUINEA AND SENEGAL

are key source countries for Hong Kong seahorse imports, yet neither have reported CITES export data

103,000 SEAHORSES

were reported imported from South Africa by Hong Kong despite South Africa reporting no exports

1 LACK OF MONITORING THE SEAHORSE TRADE AND IMPLEMENTING CITES REGULATIONS

All seahorse species (Genus: *Hippocampus*) were listed on CITES App II in 2004 which requires the granting of export permits for international trade. According to Hong Kong SAR's customs data; Guinea and Senegal are key source countries for dried seahorses imported by Hong Kong SAR, however there are no CITES export data reported by Guinea and Senegal for the seahorse trade. Additionally, Senegal continues to trade in dried seahorses despite a CITES trade suspension for *H. algiricus* since 2011 due to unsustainable harvest levels.

RECOMMENDATION: MANAGEMENT AUTHORITIES TO ADDRESS EXPORT PERMITS ISSUE

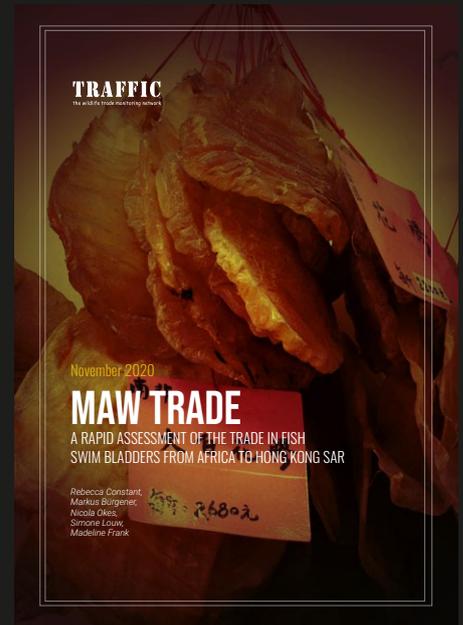
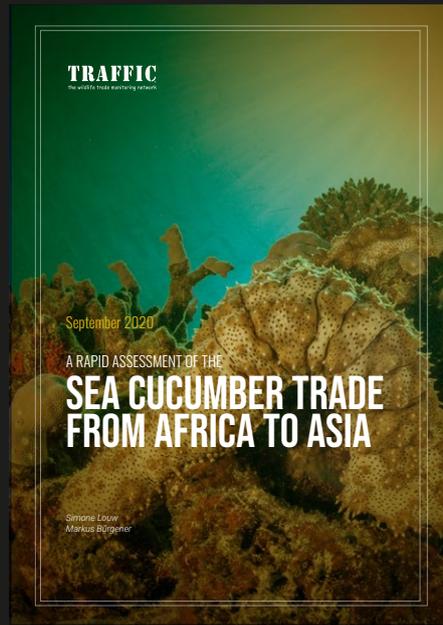
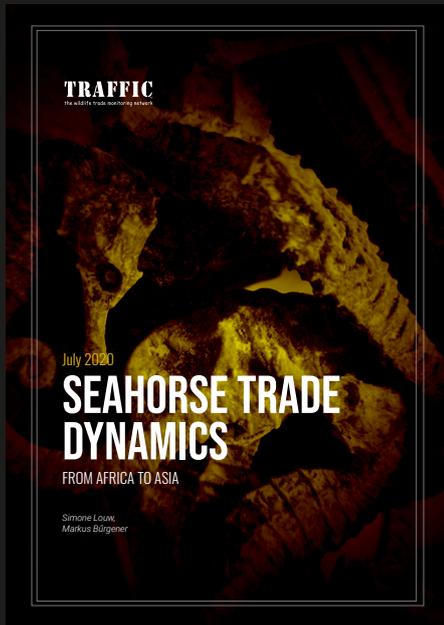
The CITES Management Authority within Guinea (Ministère de l'Environnement, des Eaux et Forêts) and Senegal (Direction des Eaux, forêts, chasses et de la conservation des sols) need to address the lack of implementing CITES export permits related to the seahorse trade and in the case of Senegal – lack of implementing CITES trade suspension for *H. algiricus*.

2 LACK OF IMPLEMENTING NATIONAL AND CITES REGULATIONS

Hong Kong SAR customs data indicated imports of 103,000 individual seahorses from South Africa, while no CITES exports were reported by South Africa. The seahorse species *Hippocampus capensis* endemic to South Africa is protected under the Biodiversity Act of 2004 and is one of the most threatened seahorse populations in the world.

RECOMMENDATION: SOUTH AFRICA TO INVESTIGATE HONG KONG IMPORTS

The CITES Management and Scientific Authority in South Africa, the Department of Environmental Affairs (DEA) and The South African National Biodiversity Institute (SANBI), should investigate these imports reported by Hong Kong SAR customs and the lack of granting the relevant CITES export permits.



APPENDIX

Constant R., Okes, N., Bürgener, M., Louw, S., Frank, M., (2020). *Maw Trade: A rapid assessment of the trade in fish swim bladders from Africa to Hong Kong SAR*. TRAFFIC International.

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(left) A. Mustard (right) James Morgan / WWF-US

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