

Call for Evidence on

The Scale of Shark Fin Trade in the UK and Possible Impacts of Stricter Controls

Questions 6 & 7: Please provide any evidence you have of the amount/value of shark fins entering and leaving the UK.

The CITES database¹ lists no imports of fins from CITES listed elasmobranchs into the UK between 2000 and 2019 and only two exports of fins to the USA during that period (2013 *Sphyrna lewini*; 2013 *Lamna nasus*). For the time period of 2007 and 2019 a total of 90 reports for the import of elasmobranch items into the UK are classified either as specimen, skeleton or skin pieces which might also refer to fins in some cases as the definition of terms is not always fully clear. The vast majority of the imports were imported for scientific purposes.

Although the issued non detrimental findings the export of CITES listed species are known to be not always based on such strong and scientifically sound justifications for the sustainable catch of those species as ideally warranted by CITES the import/ export is at least clearly traced and reported which is not guaranteed for the trade of shark fins in general as they are so far part of the legal and vastly unrestricted trade of seafood products.

According to the report of Scientific, Technical and Economic Committee for Fisheries (STECF)² the UK has reported between 2,000t and 3,000t of ‘marketable fin’ shark species landings per year between 2015 and 2018 with 12,000 – 14,000 landings per year reported by the UK under the Finning Regulation over that time based on reports (2016-2019) supplied to the EWG. Thereby UK ranked number four with regard to shark landings within EU coastal states, after Spain, Portugal and France while not all member states had reported their catches throughout this period and France reported only once in 2018, reporting close to 22,000 tons landed in 137,000 landings that year.

¹ CITES trade statistics derived from the CITES Trade Database, UNEP World Conservation Monitoring Centre, Cambridge, UK
https://trade.cites.org/en/cites_trade/ (accessed on 31.12.2020)

² Reports of the Scientific, Technical and Economic Committee for Fisheries Review of the implementation of the shark finning regulation and assessment of the impact of the 2009 European Community Action Plan for the Conservation and Management of Sharks (STECF-19-17); <https://op.europa.eu/de/publication-detail/-/publication/31b872de-329c-11ea-ba6e-01aa75ed71a1/language-en;>; p. 46/47

The Traffic (2019) report³ identifies the UK as an importer for more than 300 tons of shark fins over a period of five years between 2013 and 2017 based on the trade flows from the UN Comtrade database.

According to a 2019 report analyzing HM Revenue and Customs data, up to 50 tons of shark fins have been exported from the U.K. in the past two and a half years, most of it to Spain, from where it is believed to be exported to key market countries in Asia.⁴

And in answer to a request from the Labour Party in 2019 on the export of shark fins from the UK over the last 5 years, the Secretary of State for Environment, Food and Rural Affairs had replied⁵ that “in 2014, 2015 and 2016 there were no exports of shark fin products. In 2017 there were 50 tonnes exported and in 2018 there were 35 tonnes exported.” The species and destination of the exports were not disclosed.

Although those quantities are not huge compared to some other European nations, they still demonstrate that the UK was and still is involved into the fin business and those official figures most probably exclude the quantities within the 20 kg of personal allowance, which most probably hardly ever get reported.

Data from HMRC, which only goes back to January 2017, reveals that shark fins valued at over £300,000 were sent to Spain between 2017 and the present day. In the first five months of 2019, the UK has sent almost 12 tons of shark fins, worth £92,000, to Spain.⁶



Picture: @Marcin Kilarski

³ Okes, N. and Sant, G. (2019). An overview of major shark traders, catchers and species. TRAFFIC, Cambridge, UK. p.14

⁴ Joe Sandler Clarke; Britain has exported more than 50 tonnes of shark fins since 2019; 29.07.2019; <https://unearthed.greenpeace.org/2019/07/29/shark-fin-soup-uk/>

⁵ UK Parliament written questions , answers and statements; sharks: animal products; UIN 291137, tabled on 25 September 2019 <https://questions-statements.parliament.uk/written-questions/detail/2019-09-25/291137>; (accessed on 04.01.2021)

⁶ Joe Sandler Clarke; Britain has exported more than 50 tonnes of shark fins since 2019; 29.07.2019; <https://unearthed.greenpeace.org/2019/07/29/shark-fin-soup-uk/>

Data from a report commissioned by Sharkproject in 2015⁷ showed that in 2014, the UK imported 222 tons of shark, slightly more than in 2013 (200). Whole frozen products represented 75% of the total and whole fresh 25%. and Faroe was by far the main supplier (80%), followed by Canada (9%) and Spain (6%). The exact nature of the shark products exported by Faroe remained unclear. British exports of shark meat products (excluding spurdog and Scyliorhinus spp.) were very low. In 2013, the country exported 6 tonnes of frozen (to France, Germany and USA), 59 t of fresh (all to France) and 18 tonnes of filet (Netherlands and France). In 2014, UK exported 69 t of fresh (98% to France, rest to Netherlands) and one t of filet to France. Interestingly, trade with Spain does not appear in UK trade reports to Eurostat whereas in 2012, Spain reported 349 t of imports from the UK and 175 in 2013.

It might also be interesting to note, that the reported import and export data for shark products often don't match and quantities also vary between different reports depending on the data sources reported. This is observed for a variety of different countries. Even in Austria, which is generally not a major import country for shark products and does not have any own shark fishing or exports, three out of four ministries in Austria (including the ministry of finance not being aware of any duties paid on imported shark products from non EU countries) could not verify data on the import of shark products at all when asked for as part of an official information request.⁸ At the same time, there is evidence that shark meat and fins have been and still are being offered in Austrian restaurants. In this case, it is particularly tragic that the responsible authority for species protection in Austria, could also not verify importation of shark products - even though, according to the Federal Ministry for Digitalization and Economic Location, there is solid proof that shark products have been imported:

- In 2017, 119 tons of shark products of which about 40 tons were imported from non-EU countries.
- In 2018, a total of 56 tons were imported, of which about 12 tons from EU third countries.
- In 2019, a total of eleven tons were imported, of which about 0.6 tons from EU third countries.

This supports the assumption that shark products (including fins) may not always be clearly identified and may be confused with other fish and fish products upon import and export. Therefore, no verifiable records exist on how many fins or other shark products including products from possible CITES listed species or derived by finning may have been imported into Austria.

⁷ Romain Chabrol, 2015. Pelagic shark meat in Europe. Preliminary research on main markets and links with iberic longline sector; p 35/36; https://www.academia.edu/18200155/Pelagic_shark_meat_in_Europe_Preliminary_research_on_main_markets_and_links_with_iberic_longline_sector_2015

⁸ Parliamentary request to Austrian Parliament; Import von Haifischprodukten 1785/AB of 26.06.2020 on 1745/J (XXVII. GP); https://www.parlament.gv.at/PAKT/VHG/XXVII/AB/AB_01785/imfname_806742.pdf and https://www.parlament.gv.at/PAKT/VHG/XXVII/J/J_01745/index.shtml; (accessed and response translated on 31.12.2020)

A similar situation may also apply to the UK and substantial differences between imports reported by one and the exports reported by the other country are also known for several other European countries like Spain and Portugal. For instance, in 2014, Portugal reported 1,425 tons of imports of shark products from Spain, which reported 3025 tons of export to Portugal.⁹

Fin value of individual species and their distribution in the fin trade

According to papers from Fields et al. 2017 (% all fins); Cardenosa et al. 2019 (% small fins) the majority of fins in the fin trade comprising more than 10% of the majority of fins in the fin trade came from *Prionace glauca* (34% of all fins), *Rhizoprionodon acutus* (25% of small fins), *Sphyrna lewini* (16% of small fins and 4% of all fins), *Carcharhinus spp.* (18% of small fins), *Carcharhinus sorrah* (11% of small fins), *Carcharhinus limbatus* (11% of small fins), and *Carcharhinus falciformis* (10% of all fins). Most of these species were sharks, but batoids (Family Rhinidae) and chimaeras (Family Callorhynchidae) were also present. Ten oceanic shark species were identified (23.2% of all species present) that comprised the majority (71.6%) of all trimmings identified to the species/species complex level. All of the remaining species (83.7% of all species recorded, 28.4% of trimmings) were coastal. Many (41.5%) of the species and species groups identified are threatened with extinction based on the International Union for Conservation of Nature (IUCN), and species in these categories represented 39.2% of the identified trimmings¹⁰

Although fin prices have decreased somewhat since 2010 when hammerhead fins sold for 2,750 €/kg compared to only 7-12 €/kg for blue shark fins and 15-25 €/kg for mako fins prices¹¹ for the most valuable fins like those from critically endangered hammerheads or rhino rays still achieve much higher prices of up to 1,000 \$/kg¹².

Blue sharks make up the majority of the fin trade and are also the main landed species in tons and in euros for Spain, they accounted in 2017 for 50,389 tons (90% of the total landings) landed by the Spanish fleet achieving close to 90,000 k€ at an average price of € 1.7 per kilogram.¹³ Although blue sharks (*Prionace glauca*) were globally rated as near threatened with a decreasing trend in 2018 by IUCN, this species is already critically endangered in the Mediterranean with a decreasing trend when assessed last time in 2016. And in view of the

⁹ Romain Chabrol, 2015. Pelagic shark meat in Europe. Preliminary research on main markets and links with iberic longline sector; p19;
https://www.academia.edu/18200155/Pelagic_shark_meat_in_Europe_Preliminary_research_on_main_markets_and_links_with_iberic_longline_sector_2015

¹⁰ S; Diego Cardeñosa, Andrew T. Fields, et al; Species composition of the largest shark fin retail-market in mainland China.; Sci Rep. 2020; 10: 12914.; Published online 2020 Jul 31. doi: [10.1038/s41598-020-69555-1](https://doi.org/10.1038/s41598-020-69555-1) ; p3;

¹¹ Sarah Fowler and Bernard Séret with contributions from Sonja Fordham, Shelley Clarke and Julia Santana Garçon; Shark fins in Europe: Implications for reforming the EU finning ban November 2010; p9

¹² A Special Group of Rays Are Now World's Most Threatened Marine Fish
IUCN Shark Specialist Group Flags Need to Protect Critically Endangered "Rhino Rays"; July 2019;
<https://www.iucnssg.org/press.html>

¹³ Reports of the Scientific, Technical and Economic Committee for Fisheries Review of the implementation of the shark finning regulation and assessment of the impact of the 2009 European Community Action Plan for the Conservation and Management of Sharks (STECF-19-17); p 67; <https://op.europa.eu/de/publication-detail/-/publication/31b872de-329c-11ea-ba6e-01aa75ed71a1/language-en>;

massive quantities caught every year by the EU fleet in the Atlantic alone it may not take much longer until also this species will be rated as threatened. As outlined above blue sharks make by now up for the biggest proportion in the fin trade and are almost exclusively fished for their fins as blue shark meat is considered to be of low value and often sold for 1-2 €/kg and often processed into pet food or fish meal. There are no harvest control rules in place for blue sharks or other sharks in the big tuna RFMOs ICCAT, IOTC, IATTC and WCPFC and although ICCAT has finally established a TAC for blue sharks in 2019¹⁴ after substantial concerns raised from scientists and NGOs about the ongoing unlimited catches despite the high uncertainty of the stocks, the imposed TACs are at the same level as landings over the last couple of years and will merely prevent a further increase in catches rather than a precautionary management of stocks in the Atlantic. No TACs are in place in the other big tuna RFMOs. Thereby the fin trade although legal for this species may well be the driver for this species also being driven into a threatened status despite its much higher reproductive rate and lower vulnerability to overfishing as compared e.g. with the shortfin mako shark, which has been driven by continued overfishing to the brink of a complete collapse of the stock in the North Atlantic.¹⁵ In the Indian Ocean the last mako stock assessment in 2019 had resulted in different results based on data from the Japanese and the Portuguese longline fleets and the Science Committee had therefore concluded not being able to make clear recommendations for conservation of the stocks and made only general recommendations without advising the adoption of specific measures.¹⁶ Therefore, commercial interests in profits from fins and meat are often the main drivers for shortcomings in the conservation of sharks in many RFMOs. And for species providing marketable fins this risk is generally higher than for species caught and traded only for the meat while the vulnerability of shark species to overexploitation differs between different shark species and is generally much higher for the larger pelagic species due to their low reproductive rates and highly migratory behavior, but also influenced by their susceptibility to different gear types as e.g. silky sharks (*Carcharhinus falciformis*) rated as vulnerable by IUCN and listed on CITES Appendix II are mostly affected from the increasing percentage of purse seine fisheries setting on drifting FADs instead on free sets and the high post release mortality rates of the mostly juvenile animals even when released alive from the broiler.¹⁷ Also silky sharks contribute to the fin trade to a major percentage as summarized above, highlighting that those species which are most desirable for the fin trade often also face the highest risks of extinction as also apparent for rhino rays (Rhinidae), which by now make up for the most endangered group of marine fish in the world, with 15 out of 16 species of rhino rays being categorized as critically endangered while fins from rhino rays achieve at the same time the highest prices in the international fin trade.¹⁸

Despite the often-stated sustainability of fishing and shark fishing activities the results of an

¹⁴ ICCAT Press Release;; 26th Regular Meeting of the International Commission for the Conservation of Atlantic Tunas ; 25 November 2019, Palma de Mallorca, Spain;
https://www.iccat.int/Documents/Meetings/COMM2019/PRESS_RELEASE_ENG.pdf

¹⁵ ICCAT REPORT OF THE STANDING COMMITTEE ON RESEARCH AND STATISTICS (SCRS); Madrid, 30 September-4 October 2019), p230;
https://www.iccat.int/Documents/Meetings/Docs/2019/REPORTS/2019_SCRS_ENG.pdf

¹⁶ IOTC Scientific Committee 2020; IOTC-2020-SC23-ES20 Shortfin Mako stock status summary;
<https://www.iotc.org/documents/shortfin-mako-shark>

¹⁷ Hutchinson MR, Itano D, Muir JA, Holland KN. (2015) Post-release survival of juvenile silky sharks in the tropical tuna purse seine fishery. Marine Ecology Progress Series, Vol. 521, pp. 143- 154

¹⁸ A Special Group of Rays Are Now World's Most Threatened Marine Fish; IUCN Shark Specialist Group Flags Need to Protect Critically Endangered "Rhino Rays"; May 18, 2019; <https://www.iucnssg.org/press.html>

assessment of 173 shark management units (or shark stocks) for 46 species performed by Lack et al., 2014 concluded that 150 of those assessed were having a high management risk and 23 as having a medium management risk. No shark management unit / stock was assessed to be at low M-Risk. Ninety per cent of management units/stocks of species considered to produce high value products traded internationally were assessed as at high risk.¹⁹



Picture: @Hendrik Luecke

¹⁹ Lack, M., Sant, G., Burgener, M. and Okes, N. (2014). Development of a Rapid Management-Risk Assessment Method for Fish Species through its Application to Sharks: Framework and Results. Report to the Department of Environment, Food and Rural Affairs. Defra Contract No. MB0123.; p 35;

Question 8. Please provide any evidence you have to assist our understanding of businesses that are supported by the movement of shark fins between the UK and other countries.

Please include:

Jobs and the business situation of companies do not depend on shark fin products to any substantial extent, simply as there are no companies or jobs existing that specialize on business with shark fin or shark fin products other than if participating in the illegal harvesting and trading of fins. Business generally might affect airlines, restaurants and hotels. However restaurants and hotels in UK, which still offer shark fin soup to their customers will most likely not face big loss if having to delete shark fin products from their menus in the future. On the contrary, they will receive benefit from general acknowledgement of their environmental awareness by social society.

However, shark fins are still very valuable as still in demand in South East Asia and therefore substantial illegal business (including the mafia) continues to exist, benefitting mostly from the overexploitation and illegal trade of increasingly threatened shark and ray species. Especially this kind of business will be eliminated most importantly through an import ban of shark fins in the UK including a removal of the personal allowance of individuals upon reentering the UK. Most of the illegal business also includes finning of sharks at sea and feeds further over-exploitation of our oceans.

Fisheries: most sharks caught in the UK are too small to have valuable fins and those that do are either CITES listed species e.g. basking shark and protected in UK waters. Far distant fleets might benefit from the value of fins but British fisheries are not reporting huge quantities of shark landings compared to Spain, Portugal and France. Spain being the biggest global player in shark landings within the EU, catches large quantities of sharks with a total value of the ‘fin marketable’ sharks declared by Spain for 2017 for 55,937 t and a value of 99,939 k€, mostly in the Atlantic but also in the Pacific and the Indian Ocean. However, in those regions to date a FNA policy is not mandatory or monitored by most RFMOs and many coastal states. Although EU vessels are required to comply with FNA also at a global level and in international waters the EWG could not evaluate any progress in waters beyond national jurisdiction (STECF-19-17, 2019)²⁰. Due to the low surveillance levels existing in most RFMOs and the high Seas full compliance with FNA can not be ensured and can’t be verified as confirmed in the report. Except in the Atlantic where the Spanish and Portuguese tuna longlining fleets also target sharks, sharks are mostly not the target species of EU fisheries but rather a welcome bycatch, which they retain for the value of the fins. Of the 16 member states with waters of ecological relevance only the UK has developed a National Plan of Action according to the IPOA guidelines (Defra (2011) Shark, Skate and Ray conservation plan) while some other member states have developed national policy plans or specific conservation measures²¹.

While small scale coastal fisheries might benefit from exporting fins which often achieve better prices on the international market than the fish caught otherwise, those fisheries also

²⁰ Scientific, Technical and Economic Committee for Fisheries (STECF), 2019; p 68 - 79

²¹ Scientific, Technical and Economic Committee for Fisheries (STECF), 2019; p81



Picture: @Hendrik Luecke

have very little surveillance, often no effective finning bans in place and are often also not managed sustainably especially when targeting sharks for their fins. Therefore, the focus should not be generation of income from exploitation of vulnerable species but rather conservation of their coastal ecosystems to ensure long-term income and livelihoods for those fisheries from healthy marine ecosystems and for that healthy sharks populations are essential.

Wholesalers and processors: those are the ones achieving the biggest profit in the fin trade as the „unit value of imported unprocessed frozen or dried shark fin is much lower than that of re-exported processed fin“²².

However, the biggest profit margins in this business are achieved from protected species that are traded illegally like hammerhead sharks or wedge fishes achieving 10 – 100 times higher prices for the kg of fins than e.g. blue shark fins²³

Transport companies (airlines, cargo lines, shipment companies) –do transport fins but are not really dependent on those revenues as this is only one cargo amongst many others and indeed many of them have already voluntarily banned the transportation of fins, e.g. many airlines, cargo lines and other shipment companies. British Airways as the biggest UK airline refuses to carry fins, which should also send an important signal to other British corporations/organizations.

Restaurants and supermarkets selling shark fin soup – see answer to question 12

²² Okes, N. and Sant, G. (2019). An overview of major shark traders, catchers and species. TRAFFIC, Cambridge, UK. p.11

²³ Sarah Fowler and Bernard Séret with contributions from Sonja Fordham, Shelley Clarke and Julia Santana Garçon; Shark fins in Europe: Implications for reforming the EU finning ban November 2010; p9

Question 9. Please provide any evidence you have on the impacts on species conservation of the import and export of shark fins to and from the UK.

The European Union is a major player in the highly profitable shark business and with over 112,000 tons²⁴ of sharks landed per year it is actually the world leader shark catches based on officially reported landings and Spain, Portugal and France are individually among the top 20 shark catching nations in the world. With over 3,500 tons²⁵ of shark fins exported annually by the EU to Asia, and one of the major players in the fin business.

The trade with fins is mostly legal in Europe as long as those are not harvested from protected species or from CITES II listed species without the corresponding non-detrimental findings having been issued by the exporting country. Europe both, harvests and trades huge quantities of fins globally, while the origin of many of those fins is difficult to trace. Fins may thus also origin from countries or regions without effective finning bans in place or having been harvested from protected species, subject to international trade restrictions by the Convention on International Trade with Endangered Species of Wild Fauna and Flora (CITES) Appendix I, completely banning all international trade, or Appendix II, requiring the assessment and verification of the sustainability of their removal from the wild by the exporting country or when importing from the High Seas.

However, on the basis of separated fins it is difficult and often impossible to determine which species they have been derived from without the use of expensive and time-consuming analytical methods like DNA Barcoding. Therefore, verification of the origin of each fin within a cargo of loose fins is difficult and therefore the presence of CITES listed species mostly remains undetected in cargos of fins, owing detection of those species during controls at customs upon export, transit or import most often to a lucky coincidence rather than a targeted inspection.

A significant proportion of fins are transported by air and Europe thereby plays besides the United States of America an important role as a hub for the transport of fins from South America to Southeast Asia and violations of CITES regulations for Appendix II listed species have been reported repeatedly.²⁶ The routing through Europe may possibly gain further importance as more and more US States and possibly also at a federal level, the United States implement and execute fin trade bans, forcing the trade of those - including the illegal trade of protected species – to be rerouted via Europe. And Heathrow Airport may then become a major hub for this within Europe due to the frequent and established connections to South East Asia

For example in spring 2018, three tons of shark fins with an estimated market value of 3 million euros came to the attention of customs at Frankfurt Airport. This cargo on a plane from Mexico was scheduled to continue from Frankfurt to Hong Kong, but alert officials grew suspicious and upon inspection 400 kg of oceanic whitetip shark fins (*Carcharhinus longimanus*), a species subject to Appendix II regulations, were found in this shipment without appropriate export permits (non-detrimental findings) being available. It was

²⁴ Okes, N. and Sant, G. (2019). An overview of major shark traders, catchers and species. TRAFFIC, Cambridge, UK.; <https://www.traffic.org/site/assets/files/12427/top-20-sharks-web-1.pdf>

²⁵ Felix Dent, Shelley Clarke; State of the global market for shark products; FAO FISHERIES AND AQUACULTURE TECHNICAL PAPER 590; Rom 2015; p. 71ff.

²⁶ <https://www.cites.org/eng/prog/shark/more.php>

therefore designates as an illegal shipment and the fins were confiscated by customs in Frankfurt. In many other cases however, the identification of loose fins in dried or frozen form is extremely difficult especially when those are hidden together with other fins stacked in dozens of boxes or containers, making it almost impossible to verify and identify all species contained in such a shipment.²⁷

Using DNA barcoding to identify species from dried shark fins recent studies identified fins of threatened sharks, including the critically endangered, CITES Appendix II listed scalloped hammerhead shark (*Sphyrna lewini*), the endangered, CITES Appendix II listed shortfin mako shark (*Isurus oxyrinchus*) and the critically endangered small eye hammerhead shark (*Sphyrna tiburo*) among fins obtained from UK wholesalers and from fins from Mozambique seized by UK Border Force as one of the most significant seizures of recent years (100 kg in total); This highlights the global nature of the damaging trade in endangered shark species, in which Europe and the UK also play a major role.²⁸



Picture: @Hendrik Luecke

²⁷ Sharkproject 2018; <https://www.sharkproject.org/sharkproject-spezifiziert-und-archiviert-beschlagnahmte-haiflossen/>

²⁸ Hobbs C.A.D., et al. 2019: Using DNA Barcoding to Investigate Patterns of Species Utilisation in UK Shark Products Reveals Threatened Species on Sale. <https://www.nature.com/articles/s41598-018-38270-3>; p. 1

Question 10. Are there greater conservation impacts from the import and export of shark fins to and from the UK on some species than others?

The species that are the most sought after and most expensive are also the ones often most endangered and in need of the strongest protection. However, as mentioned above, it is very difficult to identify shark species and verify the presence of threatened and protected species on a routine basis from loose fins.

Thereby the UK may unfortunately and unwillingly complicit in the mess that highly endangered species will continue to face extinction if continuing to allow imports and exports of shark fins and if maintaining a shark fin-specific exemption that allows individuals traveling to the UK to carry 20 kg of dried shark fins for personal consumption.

Further, the UK is complicit in perpetuating the impression among some consumers that the trade in and consumption of shark fins is legitimate, and thus in perpetuating the demand for it.

Fin value of individual species and their distribution in the fin trade

According to papers from Fields et al. 2017 (% all fins); Cardenosa et al. 2019 (% small fins) the majority of fins in the fin trade comprising more than 10% of the majority of fins in the fin trade came from *Prionace glauca* (34% of all fins), *Rhizoprionodon acutus* (25% of small fins), *Sphyrna lewini* (16% of small fins and 4% of all fins), *Carcharhinus spp.* (18% of small fins), *Carcharhinus sorrah* (11% of small fins), *Carcharhinus limbatus* (11% of small fins), and *Carcharhinus falciformis* (10% of all fins). Most of these species were sharks, but batoids (Family Rhinidae) and chimaeras (Family Callorhynchidae) were also present. Ten oceanic shark species were identified (23.2% of all species present) that comprised the majority (71.6%) of all trimmings identified to the species/species complex level. All of the remaining species (83.7% of all species recorded, 28.4% of trimmings) were coastal. Many (41.5%) of the species and species groups identified are threatened with extinction based on the International Union for Conservation of Nature (IUCN), and species in these categories represented 39.2% of the identified trimmings²⁹

Although fin prices have decreased somewhat since 2010 when hammerhead fins sold for 2,750 €/kg compared to only 7-12 €/kg for blue shark fins and 15-25 €/kg for mako fins prices³⁰ for the most valuable fins like those from critically endangered hammerheads or rhino rays still achieve much higher prices of up to 1,000 \$/kg³¹.

Blue sharks make up the majority of the fin trade and are also the main landed species in tons and in euros for Spain, they accounted in 2017 for 50,389 tons (90% of the total landings) landed by the Spanish fleet achieving close to 90,000 k€ at an average price of € 1.7 per

²⁹ S; Diego Cardeñosa, Andrew T. Fields, et al; Species composition of the largest shark fin retail-market in mainland China.; Sci Rep. 2020; 10: 12914.; Published online 2020 Jul 31. doi: [10.1038/s41598-020-69555-1](https://doi.org/10.1038/s41598-020-69555-1); p 3

³⁰ Sarah Fowler and Bernard Séret with contributions from Sonja Fordham, Shelley Clarke and Julia Santana Garçon; Shark fins in Europe: Implications for reforming the EU finning ban November 2010; p9

³¹ A Special Group of Rays Are Now World's Most Threatened Marine Fish
IUCN Shark Specialist Group Flags Need to Protect Critically Endangered "Rhino Rays"; July 2019;
<https://www.iucnssg.org/press.html>

kilogram.³² Although blue sharks (*Prionace glauca*) were globally rated as near threatened with a decreasing trend in 2018 by IUCN, this species is already critically endangered in the Mediterranean with a decreasing trend when assessed last time in 2016. And in view of the massive quantities caught every year by the EU fleet in the Atlantic alone it may not take much longer until also this species will be rated as threatened. As outlined above blue sharks make by now up for the biggest proportion in the fin trade and are almost exclusively fished for their fins as blue shark meat is considered to be of low value and often sold for 1-2 €/kg and often processed into pet food or fish meal. There are no harvest control rules in place for blue sharks or other sharks in the big tuna RFMOs ICCAT, IOTC, IATTC and WCPFC and although ICCAT has finally established a TAC for blue sharks in 2019³³ after substantial concerns raised from scientists and NGOs about the ongoing unlimited catches despite the high uncertainty of the stocks, the imposed TACs are at the same level as landings over the last couple of years and will merely prevent a further increase in catches rather than a precautionary management of stocks in the Atlantic. No TACs are in place in the other big tuna RFMOs. Thereby the fin trade although legal for this species may well be the driver for this species also being driven into a threatened status despite its much higher reproductive rate and lower vulnerability to overfishing as compared e.g. with the shortfin mako shark, which has been driven by continued overfishing to the brink of a complete collapse of the stock in the North Atlantic.³⁴ In the Indian Ocean the last mako stock assessment in 2019 had resulted in different results based on data from the Japanese and the Portuguese longline fleets and the Science Committee had therefore concluded not being able to make clear recommendations for conservation of the stocks and made only general recommendations without advising the adoption of specific measures.³⁵ Therefore, commercial interests in profits from fins and meat are often the main drivers for shortcomings in the conservation of sharks in many RFMOs. And for species providing marketable fins this risk is generally higher than for species caught and traded only for the meat while the vulnerability of shark species to overexploitation differs between different shark species and is generally much higher for the larger pelagic species due to their low reproductive rates and highly migratory behavior, but also influenced by their susceptibility to different gear types as e.g. silky sharks (*Carcharhinus falciformis*) rated as vulnerable by IUCN and listed on CITES Appendix II are mostly affected from the increasing percentage of purse seine fisheries setting on drifting FADs instead on free sets and the high post release mortality rates of the mostly juvenile

³² Reports of the Scientific, Technical and Economic Committee for Fisheries Review of the implementation of the shark finning regulation and assessment of the impact of the 2009 European Community Action Plan for the Conservation and Management of Sharks (STECF-19-17); <https://op.europa.eu/de/publication-detail/-/publication/31b872de-329c-11ea-ba6e-01aa75ed71a1/language-en>; p 67

³³ ICCAT Press Release;; 26th Regular Meeting of the International Commission for the Conservation of Atlantic Tunas ; 25 November 2019, Palma de Mallorca, Spain;
https://www.iccat.int/Documents/Meetings/COMM2019/PRESS_RELEASE_ENG.pdf

³⁴ ICCAT REPORT OF THE STANDING COMMITTEE ON RESEARCH AND STATISTICS (SCRS); Madrid, 30 September-4 October 2019), p230;
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³⁵ IOTC Scientific Committee 2020; IOTC-2020-SC23-ES20 Shortfin Mako stock status summary;
<https://www.iotc.org/documents/shortfin-mako-shark>

animals even when released alive from the broiler.³⁶ Also silky sharks contribute to the fin trade to a major percentage as summarized above, highlighting that those species which are most desirable for the fin trade often also face the highest risks of extinction as also apparent for rhino rays (Rhinidae), which by now make up for the most endangered group of marine fish in the world, with 15 out of 16 species of rhino rays being categorized as critically endangered while fins from rhino rays achieve at the same time the highest prices in the international fin trade.³⁷

Despite the often-stated sustainability of fishing and shark fishing activities the results of an assessment of 173 shark management units (or shark stocks) for 46 species performed by Lack et al., 2014 concluded that 150 of those assessed were having a high management risk and 23 as having a medium management risk. No shark management unit / stock was assessed to be at low M-Risk. Ninety per cent of management units/stocks of species considered to produce high value products traded internationally were assessed as at high risk.³⁸



Picture: @Hendrik Luecke

³⁶ Hutchinson MR, Itano D, Muir JA, Holland KN. (2015) Post-release survival of juvenile silky sharks in the tropical tuna purse seine fishery. *Marine Ecology Progress Series*, Vol. 521, pp. 143- 154)

³⁷ A Special Group of Rays Are Now World's Most Threatened Marine Fish; IUCN Shark Specialist Group Flags Need to Protect Critically Endangered "Rhino Rays"; May 18, 2019; <https://www.iucnssg.org/press.html>

³⁸ Lack, M., Sant, G., Burgener, M. and Okes, N. (2014). Development of a Rapid Management-Risk Assessment Method for Fish Species through its Application to Sharks: Framework and Results. Report to the Department of Environment, Food and Rural Affairs. Defra Contract No. MB0123; p 35

Question 11. How would stricter controls on the import and export of shark fins affect businesses (importing and exporting companies, fishing industry etc.)?

As none of those companies are totally dependent on the shark fin trade and generate their revenues only to a smaller part from this trade – at least from the legal part of the trade, such a ban on the import of fins will not have any impact on any of them. Terminating the illegal aspect may of course have an impact on those players but then nobody should be allowed to benefit from illegal activities and especially when those illegal activities put the survival of threatened species and the marine ecosystems as a whole at stake.

And while such a ban in the UK alone may as such not be a game changer for that it will for sure be an important signal for a sustainable management of our oceans and the fish stocks on which the livelihoods of millions of people all over the world and also within the UK depend upon. While sharks might be managed sustainably in some fisheries the majority of shark fisheries and especially those targeting sharks for their fins are far from sustainability. And overall, it has been the commercial fishing activities of the last 50 years which have been responsible for the loss of biodiversity in the oceans and the possible extinction of more than half a million of species within the next decades as predicted in the 2019 IPBES 7 report, including the loss of more than 30% of all known shark and ray species.³⁹

Achieving a transformation to sustainable fishing needs to become a priority and as long as the value of a small part of globally endangered species – the fins of sharks – can generate 10 to 100 times higher prices than their meat the incentives from a mostly illegal business will remain higher than the available means of controls at sea, fostering waste of marine life, overfishing of vulnerable shark populations and the pursuit of criminal activities like finning, retaining protected species and fueling the international demand for those as rare but highly lucrative objects. Therefore, banning the trade portion of this business will be much more effective to cut off the illegal parts of the business without harming other legal business activities from fishing including sustainable shark fishing for subsistence of coastal nations or well managed fisheries.

³⁹ IPBES (2019): Global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services. E. S. Brondizio, J. Settele, S. Díaz, and H. T. Ngo (editors). IPBES secretariat, Bonn, Germany.

Question 12. Please provide any evidence you have on what shark fins are used for in the UK.

Shark fins are mainly used to make shark fin soup in a number of British restaurants but also sold in supermarkets stocking ingredients for Chinese cuisine.

Shark fin soup sells for up to £180 per bowl in a number of UK stores⁴⁰ and international demand, particularly in parts of Asia, also remains high.

Restaurants that still served shark fin soup/shark fin dumpling in London in 2018 according to a Metro article were:

Mandarin Kitchen,

Yi-Ban,

Oversea Chinese Restaurant,

Wan Chai Corner,

Jun Peking⁴¹.



Picture: @Hendrik Luecke

and in the rest of the UK: China City, Golden Dragon, Shanghai Moon⁴²

During an online search for restaurant menus on January 2nd 2021 the following restaurants were still offering shark fins on the menu

Yi-Ban: <http://dev.yi-ban.co.uk/wp-content/uploads/2014/08/Yi-Ban+Dim+Sum+Menu.pdf>

Jun Peking: <https://www.junpeking.co.uk/delivery-and-collection-menu>

Shanghai Moon: http://www.everymenu.co.uk/leicester/chinese/shanghai_moon-460.htm

The other restaurants may have removed it from the online menu or indeed have stopped offering it but there are certainly more to be found when do further investigations.

⁴⁰ Harriet Williamson; Why are restaurants in the UK still serving shark fin soup?; 14 July 2018 <https://metro.co.uk/2018/07/14/why-are-restaurants-in-the-uk-still-serving-shark-fin-soup-7716124/>

⁴¹ Harriet Williamson; Why are restaurants in the UK still serving shark fin soup?; 14 July 2018; <https://metro.co.uk/2018/07/14/why-are-restaurants-in-the-uk-still-serving-shark-fin-soup-7716124/>

⁴² Harriet Williamson; Why are restaurants in the UK still serving shark fin soup?; 14 July 2018; <https://metro.co.uk/2018/07/14/why-are-restaurants-in-the-uk-still-serving-shark-fin-soup-7716124/>

Question 13. Please provide any evidence you have on what the impact of stricter controls on the import and export of shark fins would be on consumers and individuals?

For example, are there any social, cultural or economic impacts? Would some individuals, groups or communities be more affected than others?

A ban on the trade in and reduced consumption of shark fins could have a significant impact on the behavior of consumers and individuals, as a ban will also be perceived as a deterrent at the same time. The associated importance and purpose of the ban will be increasingly be recognized by the consumers, and the importance of sharks to the overall marine ecosystems will also be encountered. Economic arguments from the fisheries or wholesalers at the cost of sustainable management of our Ocean should not be considered as justified reasons. Indeed the sovereignty to make its own decisions on shark conservation measures now, independent from the EU provides the UK with the unique opportunity to make sustainable decisions for the management of its own EEZ and to step up and act as a shark guardian at the international arena and the RFMOs, acting as a role model for its own citizens but also for its EU neighbors, thereby driving change through all Europe.

Question 14. Please provide any evidence of the impact that import and export of shark fins to and from the UK has on supporting local livelihoods in other countries.

The shark fin trade does not secure the livelihoods of the coastal states in which the fishers may participate in the exploitation of shark populations and harvest the fins from endangered sharks for the trade to South East Asia. On the contrary!

While fishers in those countries may indeed participate in this business in order to generate additional revenues for their families as the international mafia like organizations involved in this trade do pay higher prices for the fins from rare, already overexploited and endangered species and generally fins provide higher revenues than the normal income those fisheries can achieve from their fishing activities.

The shark fin trade and especially finning destroys livelihoods and our marine ecosystems which in turn has drastic consequences for poorer areas that rely on fishing. Sharks are considered top predators and are responsible for healthy oceans and the more sharks, the more fish there are. A fin trade ban by the British government for UK would therefore also support local livelihoods in the developing world and other countries dependent on healthy marine ecosystems for subsistence fishing and export of their seafood products to the Western markets for a living.

Question 15. We are interested in finding out more about other countries' restrictions on the import or export of shark fins. Please provide any information and/or evidence that you are aware of on this.

COUNTRIES/JURISDICTIONS WITH BANS ON SHARK FINNING

but implemented through various compliance policies and different levels of surveillance and monitoring strategies in place to confirm compliance with the ban

A recent report⁴³, commissioned by the MSC and authored by an independent expert Amie Brautigam highlighted that only 21 of the world's 43 foremost shark fishing nations (i.e. 44%) had issued legislation to ban finning. Out of those nations however 90% (19 out of the 21) have a Fins Naturally Attached policy in place for at least some fisheries under their jurisdiction.

This demonstrates that “there has been a steady evolution over the past decade at least towards a FNA requirement for fisheries landing sharks, and FNA is widely considered to be ‘best practice’ not only in ensuring that shark finning is not occurring but also in enabling fisheries monitoring at the level necessary to support adaptive management of these vulnerable species”.

At the same time, it also demonstrates that finning is still far from being globally banned and that there are still enough regions where this horrible practice is still common practice, resulting in a destructive impact on shark populations and the impossibility to manage shark mortality, let alone to maintain fishing activities below FMSY.

“It is also noteworthy that no Southeast Asian country has – or appears to have – adopted a finning ban for their national waters.” Especially China, Myanmar and Viet Nam, three large shark catching nations have no ban on finning, whereas China requires compliance with a ban on finning only when fishing within RFMO waters but not in its national waters; nor do Malaysia, Nigeria, Namibia, Angola, Pakistan, Iran, Yemen, Oman, Tanzania, Senegal, Thailand, Ghana, Madagascar, Philippines, Russian Federation, Morocco, or Uruguay appear to have finning bans in place or implemented according to this report.⁴⁴

While most RFMOs have by now finning bans in place only GFCM (2018), NAFO 2017, and NEAFC (2015) have till date adopted a FNA policy without exceptions equivalent to the measures of the UK, EU or Canada and none of the big tuna RFMOs has adopted as strict FNA yet. And not even the MSC as one of the leading eco-labels for sustainable seafood does require a FNA policy as a prerequisite to certification of a fishery, although FNA is by now globally acknowledged to be the only effective measure to deter finning from happening and to provide relevant evidence for prosecution when fins are found during the generally still

⁴³ Brautigam, A. 2020. Best Practice in the Prevention of Shark Finning. Published by the Marine Stewardship Council https://www.msc.org/docs/default-source/default-document-library/stakeholders/best-practice-in-the-prevention-of-shark-finching-report.pdf?sfvrsn=3f26ac1c_4

⁴⁴ Brautigam, A. 2020. *Best Practice in the Prevention of Shark Finning*. Published by the Marine Stewardship Council https://www.msc.org/docs/default-source/default-document-library/stakeholders/best-practice-in-the-prevention-of-shark-finching-report.pdf?sfvrsn=3f26ac1c_4

rather rare inspections at sea or at port. Finning events have been reported to happen also within MSC certified fisheries⁴⁵ and also happen in all RFMOs despite the existing bans, but are not always reported reliably and hardly ever prosecuted in regions like the Western Central Pacific as evidenced for the reported cases within MSC certified fisheries.⁴⁶

The 2003 EU Shark Finning Regulation prohibited the removal of shark fins on board of all EU vessels, wherever operating, and for all vessels fishing in EU waters but granted special exemption permits to member states that allowed removal of shark fins on board based on a 5% fin to carcass ratio provided that the member state submitted a detailed report to the Commission at the end of every year. The 2013 amendment to the Shark Finning Regulation explicitly banned finning and required FNA universally by removing the special permit exemption, which had failed to demonstrate compliance.⁴⁷

However, to date batoids are still exempt to a FNA policy even under EU regulation, thereby allowing the removal of ray wings at sea without providing a clear definition of ray, which may provide a loophole for finning of Rhinopristiformes such as wedgefishes and giant guitarfishes, which include some of the most endangered but highly valuable species in the fin trade.⁴⁸

Also other nations provide various exemptions to the FNA regulations allowing fin to carcass ratios for some commercially valuable shark species (US – spiny dogfish; New Zealand - all shark species managed under a Quota Management System), or for some fisheries (South Africa – off shore fisheries; Australia – Western Australia) with varying levels of monitoring and surveillance being in place. Rays and chimeras are also excluded from the finning and FNA regulations in many countries that have FNA policies in place (e.g. New Zealand, USA, South Africa). Often no clear definition of the term “shark” is provided at all (e.g. Japan, Taiwan, Costa Rica, Peru, Ecuador, India,...) thereby also offering loopholes for compliance with the existing regulations like finning bans or FNA policies.

According to the STECF-19-17 report⁴⁹ “the fins naturally attached (FNA) policy has been implemented by the EU since, without exception. In the past 5 years there have been 14 cases of non-compliance of a total of 24591 inspections within the EU”. It was however

⁴⁵ PNA Western and Central Pacific Skipjack and Yellowfin Unassociated / non FAD set tuna purse seine fishery, 1st surveillance report 2019, page 43ff
<https://fisheries.msc.org/en/fisheries/pna-western-and-central-pacific-skipjack-and-yellowfin-unassociated-non-fad-set-tuna-purse-seine/@assessments>

⁴⁶ Sharkproject: Open Letter from 55 stakeholders sent to the board of MSC on April 5th, 2019
https://www.sharkproject.org/wp-content/uploads/2020/02/shark-finning-letter-April-5th-2019_final.pdf

⁴⁷ Regulation (EU) No 605/2013 amending Council Regulation (EC) No 1185/2003 on the removal of fins of sharks on board vessels

⁴⁸ A Special Group of Rays Are Now World’s Most Threatened Marine Fish
IUCN Shark Specialist Group Flags Need to Protect Critically Endangered “Rhino Rays”; July 2019;
<https://www.iucnssg.org/press.html>

⁴⁹ Reports of the Scientific, Technical and Economic Committee for Fisheries Review of the implementation of the shark finning regulation and assessment of the impact of the 2009 European Community Action Plan for the Conservation and Management of Sharks (STECF-19-17); <https://op.europa.eu/de/publication-detail/-/publication/31b872de-329c-11ea-ba6e-01aa75ed71a1/language-en>

highlighted that „the inspection coverage per fleet segment is not provided. Furthermore, there is currently no specific requirement to organize inspections to ensure that those fleets that have a high risk of catching sharks, especially those with marketable fins, are inspected." It should also be considered that those inspections actually account to less than 5,000 inspections per year with most inspections carried out by the UK between 2014 and 2018 with more than 1000 inspections per year and almost 100% inspections of all 11,000 landings. On the other hand only 200-300 inspections were performed by Spain per year between 2013 and 2017, and 708 in 2018 equal to less than 2% of its 40,000 landings and more than 50,000 tons of sharks landed per year. Also France from which data were only reported in 2018 had performed only 799 inspections for 137,000 landings of sharks and almost 28,000 tons landed!

And the data provided in table 4.9 of the report⁵⁰ from an undisclosed member country clearly show a further problem. While 28 inspections were performed within EU waters not a single one has been performed outside of the EU during the whole of 2019 whereas the actually biggest proportion of the countries catch of fin marketable shark species has been caught outside of the EU and only about 17% were caught in EU waters. Thus while compliance may appear to be good there is hardly any information existing for compliance of EU vessels outside of EU waters.

Table 4.9.- Main landing ports, and number of inspections, from one MS report in 2019.

Port	Inside/Outside EU waters	% of total catch	No. Inspections
A	Outside	17.82	0
B	Inside	17.44	28
C	Outside	15.98	0
D	Outside	7.29	0
E	Outside	7.24	0
F	Outside	7.08	0
G	Outside	5.53	0

This lack of coverage in waters outside the EU and lack of information on the fleet segment catching sharks were seen by the EWG as a shortcoming as this was reason for the EWG to examine the distribution of the EU fleets and the fishing practice per fleet segment in greater detail (Chapter 4.4)

⁵⁰ Reports of the Scientific, Technical and Economic Committee for Fisheries Review of the implementation of the shark finning regulation and assessment of the impact of the 2009 European Community Action Plan for the Conservation and Management of Sharks (STECF-19-17); <https://op.europa.eu/de/publication-detail/-/publication/31b872de-329c-11ea-ba6e-01aa75ed71a1/language-en>

And overall even within the EU the actual monitoring of compliance is very low and observer level even in high-risk fisheries with regard to their shark catches is still mostly less than 5%. In addition „the inspection coverage per fleet segment is not provided. Furthermore, there is currently no specific requirement to organize inspections to ensure that those fleets that have a high risk of catching sharks, especially those with marketable fins, are inspected.”⁵¹

The report also concludes that outside the EU “no instances of non-compliance by the EU fleet in relation to the shark finning regulation in the Convention Areas have been reported by any of RFMOs mentioned above. Compliance is monitored against the Conservation and Management Measures of each Commission, which include requirements to ensure compliance with the finning prohibition in force. Although the EU vessels should always be assessed against the ‘fins naturally attached’ criterion, no objective, quantitative information was available to the EWG to evaluate this. Furthermore, the mechanisms of enforcement and the level of surveillance of the shark finning related CMMs are uncertain. Therefore, the EWG could not evaluate any progress in waters beyond national jurisdiction”⁵²

In conclusion the existing regulations for banning the finning of sharks and Chondrichthyes at sea are very different in different jurisdictions, inconsistent and often incomplete, still providing multiple loopholes and are generally poorly monitored and subject to little surveillance even within EU waters, despite having a Fins Naturally Attached policy without exceptions in place. Therefore, in lack of sufficient monitoring and surveillance of compliance with the regulation especially in the EU’s far distant fleets it can’t be out-ruled that shark fins imported into Europe and the UK either from the High Seas or from EU member states have not been obtained by finning.

Over the last 10 – 15 years, a growing number of nations enforced their conservation efforts combating the illegal finning and trading of fins derived from endangered & protected species by advancing fin bans to the trade sector, ranging from import bans to complete trade bans or even a total ban on the possession of any part of a shark.

COUNTRIES/JURISDICTIONS WITH EXISTING BANS ON SHARK FISHING OR THE TRADE OF SHARK FINS

Israel (1980), Congo (2001), Egypt (2005), Palau (2009), Honduras (2010), Republic of Maldives (2010), Bahamas (2011), Marshall Island (2011), Tokelau Islands (2011), Sabah, Malaysia (2011), Cook Islands (2012), Brunei (2013), and UK Virgin Island (2014) have

⁵¹ Scientific, Technical and Economic Committee for Fisheries (STECF) – Review of the implementation of the shark finning regulation and assessment of the impact of the 2009 European Community Action Plan for the Conservation and Management of Sharks (STECF- 19-17). Publications Office of the European Union, Luxembourg, 2019, ISBN 978-92-76-11287-7, doi:10.2760/487997, JRC119051

⁵² Scientific, Technical and Economic Committee for Fisheries (STECF) – Review of the implementation of the shark finning regulation and assessment of the impact of the 2009 European Community Action Plan for the Conservation and Management of Sharks (STECF- 19-17). Publications Office of the European Union, Luxembourg, 2019, ISBN 978-92-76-11287-7, doi:10.2760/487997, JRC119051; p11

banned shark fishing completely or at least the commercial fishing for sharks in their waters.⁵³

Canada has implemented a strict FNA requirement also for skates and has extended the FNA regulation also to the trade of fins by requiring FNA also for all imports and exports of fins, which thereby need to remain naturally attached to the body of the animal when entering the country or being exported out of Canada.

Since 2010 a growing number of islands and nations have also banned the sale and/or trade of shark fins or all shark products⁵⁴ to protect sharks in their waters from national and international fishing fleets such as

- Guam (2011)⁵⁵
- The Cook Islands (2012) no commercial shark fishing, sale, or trade of shark products
- The Bahamas (2011) no commercial fishing, sale, or trade in shark products
- Marshall Islands (2011) no commercial shark fishing or sale of shark products
- Sabah, Malaysia (2011) no shark fishing, no possession and sale of fins
- Brunei (2013) no harvest and importation of shark products
- United Arab Emirates (2014) no imports and exports of shark products
- Kiribati (2016) Commercial shark fishing ban also bans the possession, trade and sale of all shark products.

In 2010 landmark legislation was introduced by Hawaii state senator Clayton Hee⁵⁶ and since then 13 other US states, 3 US Territories and many Pacific Island have modelled their regulations based on the original Hawaii bill and banned the trade of fins either partially or completely or have at least banned the import of fins. Hawaii (2010), Oregon (2011), Washington (2011), California (2011), Illinois (2012), Maryland (2013), Delaware (2013), New York (2013), Massachusetts (2014), Nevada (2017), New Hampshire (2018), Rhode Island (2016), New Jersey (2020), and Texas (2020).

In 2019, Congress introduced the Shark Fin Sales Elimination Act (H.R.737, S.877), which would largely ban the trade of shark fins in the United States. The House bill passed on November 20, 2019 and was cosponsored by 287 representatives at the time of its passage on the House floor--the most cosponsored bipartisan ocean conservation bill this Congress.⁵⁷

⁵³ Humane Society International website <https://www.hsi.org/wp-content/uploads/2019/06/2019-Shark-Fishing-and-Finning-Regulations.pdf>

⁵⁴ Humane Society International website <https://www.hsi.org/wp-content/uploads/2019/06/2019-Shark-Fishing-and-Finning-Regulations.pdf>

⁵⁵ Oceana report Shark fin trade - Why it should be banned in the United States; June 2016; <https://usa.oceana.org/publications/reports/shark-fin-trade-why-it-should-be-banned-united-states>

⁵⁶ Shark Allies website; <https://www.sharkallies.com/ending-the-trade-of-shark-fins/shark-allies-in-the-shark-fin-trade-legislation>

⁵⁷ Oceana report Shark fin trade - Why it should be banned in the United States; June 2016; <https://usa.oceana.org/publications/reports/shark-fin-trade-why-it-should-be-banned-united-states>

If this bill becomes law it will make it illegal to possess, buy, sell, or transport shark fins or any product containing shark fins in the USA, except for certain dogfish fins and thereby close the USA as a hub in the illegal fin trade and as a contributor to the exploitation of the oceans

There is also a growing number of businesses all over the world that voluntarily have banned the consumption of shark products and shark fin soup or declared that they will not participate in any trade activities including shark fins and therefore reject to transport those.

Bite-Back has successfully campaigned for ASDA to stop selling 100, 000 portions of mako and thresher shark every day, Iceland and Wagamama to stop selling blue shark, and health food store Holland & Barratt to remove shark cartilage capsules from 580 stores.⁵⁸

An extensive list of international organizations is available on many websites of NGOs and the companies themselves. The following list of companies and transportation companies that have banned shark fin product has been compiled by WILDAID and AWI and is available on the AWI website⁵⁹ and needs to be constantly maintained as more and more companies appear to be changing their previous policies on shark fins and shark products, including several airlines which were targeted and converted as part of a campaign called “Fly without Fins”⁶⁰

COMPANIES THAT HAVE BANNED SHARK FIN SOUP

- Hong Kong Disneyland
- Amazon
- Carrefour, NTUC Fairprice, Cold Storage—three major supermarket chains in Singapore
- Hongkong and Shanghai Hotels Group
- Shangri-la Hotel chain
- Westin Macau
- Fairmont Hotels Group
- 111 hotels, 4 supermarkets, 9 restaurants, and 7 other organizations/companies—as part of the “Fin Free Thailand” program; several US-owned hotels participate in this program, including Four Seasons (Bangkok, Tented Camp, Chiang Mai and Koh Samui), and the JW Marriott (Phuket)
- Starwood Hotels and Resorts (includes Westin USA, Sheraton, Le Meridien, and Four Points)
- Marriott Hotel Group
- Hilton Hotels
- Melia Hotels—Spain’s biggest hotel chain
- Ritz Carlton

⁵⁸ Harriet Williamson; Why are restaurants in the UK still serving shark fin soup?; 14 July 2018;

<https://metro.co.uk/2018/07/14/why-are-restaurants-in-the-uk-still-serving-shark-fin-soup-7716124/>

⁵⁹ Animal Welfare Institute (AWI) website <https://awionline.org/content/international-shark-finning-bans-and-policies>

⁶⁰ Fly without Fins website; <https://flywithoutfins.org>

AIRLINES THAT HAVE BANNED THE TRANSPORTATION OF SHARK FINS

- Virgin Atlantic Airways
- Austrian Airlines
- Brussels Airlines
- Eurowings
- Etihad Airways—the national airline of the United Arab Emirates
- Air New Zealand
- Asiana Airlines
- Aegan Airlines
- CAL Cargo
- Singapore Airlines
- Qantas
- Korean Airlines
- Air Dolomiti
- Eva Air
- Aeroméxico
- LAN Chile/LATAM Airlines Group
- Garuda Indonesia
- Qatar Airways
- FinnAir
- Lufthansa
- KLM (Royal Dutch Airlines)
- Air Asia
- Philippine Airlines (PAL)
- Emirates
- Air Seychelles
- Thai Airways
- Cebu Pacific
- Swiss Airways
- Air France
- COPA
- Jet Airways
- China Airlines of Taiwan
- American Airlines
- Sri Lankan Airlines
- Kenya Airways
- Iberia
- British Airways
- Cathay Pacific Airways
- Dragonair
- HK Express

- Air China
- China Southern Airlines
- China Eastern Airlines
- Shanghai Airlines
- China Cargo Airlines
- China United Airlines
- Air Canada
- Malaysia Airlines
- Transportes Aéreos Portugueses (TAP)
- Southwest Airlines
- Airlines that have a partial ban on transport of shark fins (sustainable fins only policy):
- Fiji Airways (formerly Air Pacific)

SHIPPING COMPANIES THAT HAVE BANNED SHARK FIN CARGO⁶¹

- Mediterranean Shipping Company (MSC)
- Evergreen Shipping Line
- OOCL
- Hapag-Lloyd
- Maersk
- Hamburg Süd
- Mitsui OSK Lines (MOL)
- APL
- Yang Ming
- NYK Line
- HMM
- “K” Line
- PIL (Pacific International Line)
- ZIM
- Wan Hai Lines
- China COSCO Shipping Corporation Limited
- UPS

⁶¹ Animal Welfare Institute (AWI) website <https://awionline.org/content/international-shark-finning-bans-and-policies>

16. Please provide any evidence on the effect additional restrictions on the trade in shark fins could have in the context of global shark conservation efforts.

The UK would be the first country in Europe to ban the import of shark fins! UK would therefore strengthen its position as country that cares for the future of our oceans and implements strong regulations for the protection of healthy marine ecosystems. In particular such a trade ban which will allow the UK to further demonstrate its pronounced position as a champion for the sharks and since the EU unfortunately has so far demonstrated to be rather the contrary we need leadership within Europe from the UK in this- for the future of healthy oceans which are interconnected with the role of shark populations as the top predators keeping the ecosystems in balance. The EU is the largest shark catching nation and if the neighboring UK bans imports then it will be a significant step for the shark fin trade in Europe and therefore a major step forward for shark conservation globally.

And in view of the overall surveillance and monitoring of the shark fishing fleets, the almost non existing surveillance of compliance of the EU's far distant fishing fleet, and the globally increasing threat to shark populations by unsustainable overexploitation the UK might even consider to go one step beyond and completely ban all trade with shark fins in the UK, i.e. both the import and export and step up in being Europe's first nation to take the most stringent measures also on the trade side together with its leading role within its own jurisdiction and within RFMOs as a "shark champion", being a leader in the sustainable use of our oceans and acting as a role model for others to follow suit – including the EU, that has so far regrettably failed to take steps into this direction.

17. Please provide any other relevant evidence you would like to include in considerations for imposing stricter controls on shark fin trade in the UK.

If there were stricter guidelines in the UK and more controls, then people and also other countries would start questioning their current regulations and assess those with regard to the impact of a fin trade ban on the sustainable management and conservation of sharks. This could hereby trigger a theory of change and drive similar bans of trade restrictions also in other European countries and beyond. The high market value of the product makes the allowance a loophole that can be used by both legal and illegal traders.