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# Towards a CITES listing of teatfish

Marie Di Simone,<sup>1</sup> Arnaud Horellou,<sup>1</sup> and Chantal Conand<sup>2</sup>

## Introduction

At the end of the 17<sup>th</sup> meeting of the Conference of the Parties (CoP17) of CITES (the Convention on International Trade in Endangered Species of Wild Fauna and Flora) in October 2016, the French CITES Scientific Authority (SA), under the initiative of Chantal Conand, decided to work on a proposal for listing sea cucumbers at the next CoP. The CITES CoP is the ‘supreme decision-making body’ of this Convention (CITES Secretariat 2018a), and brings together 183 Parties to CITES every two to three years to review the implementation of CITES, and determine ways to improve its effectiveness (European Commission 2007).

## The role of the Scientific Authority

The Scientific Authority (SA) is in charge of 1) gathering and analysing information on the biological status of species; 2) prioritising indigenous species affected by trade so as to make appropriate recommendations for import and export applications; and 3) assisting with the preparation of proposals necessary for amending the CITES appendices (MEEM/DEB 2016). In France, the mission of the CITES SA is entrusted to the Muséum national d’Histoire naturelle (MNHN).

## Draft proposal to include teatfish in CITES Appendix II

The French SA worked with experts of the MNHN, under the coordination of Chantal Conand, to prepare a proposal for including sea cucumbers in CITES Appendix II. The proposal concerns the subgenus *Holothuria* (*Microthele*), named teatfish, which includes four species: *Holothuria fuscogilva*, *H. fuscopunctata*, *H. nobilis* and *H. whitmaei*. These species are illustrated in the Food and Agriculture Organization (FAO) of the United Nations publication by Purcell et al. (2012). Note that another morphotype of teatfish, *H. (Microthele)* sp., currently named ‘pentard’ by fishers and scientists, is likely to be described as a new species. The data shared by FAO and other partners led to the removal of *H. fuscopunctata* from the proposal because its commercial value is low and the absence of any distinguishing morphological characteristics (see below) makes it visually similar to other sea cucumbers. The remaining three species, however,

are commercially important and are threatened by a sharp decline in their stocks.

These species meet the CITES criteria for inclusion in Appendix II, in accordance with Resolution Conf. 9.24 (Annex 2a and b), which states that a “regulation of trade in the species is required to ensure that the harvest of specimens from the wild is not reducing the wild population to a level at which its survival might be threatened by continued harvesting or other influences” (CITES 2016:5).

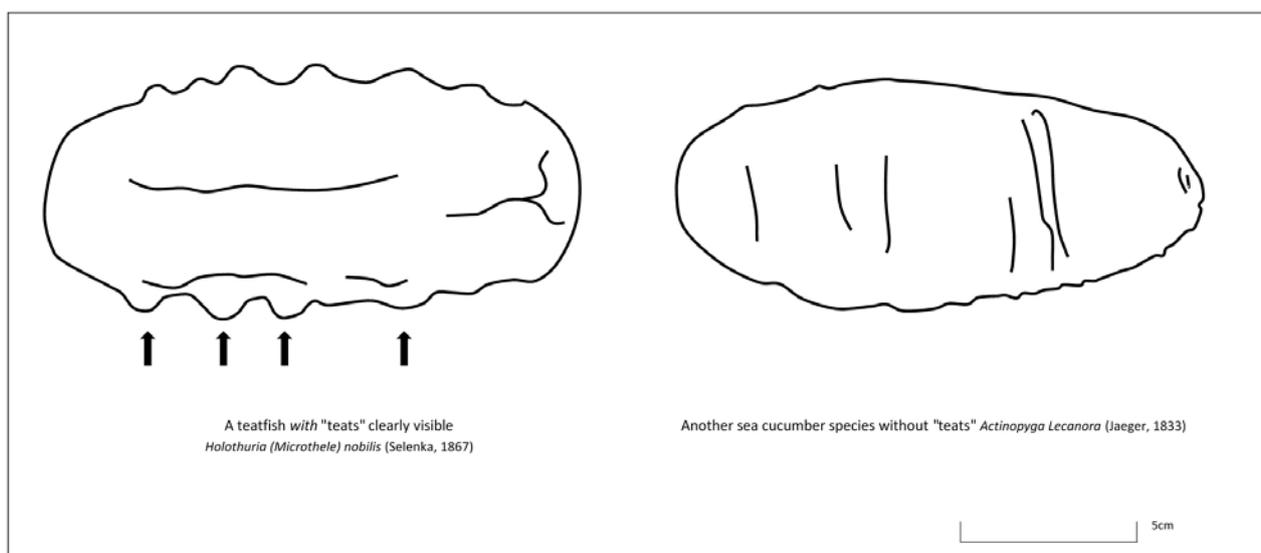
The French SA, thus, considered that CITES was the right tool to implement the required regulation to ensure the sustainability of the exploitation of these species.

## Why include only these three sea cucumber species?

The three teatfish species concerned – *Holothuria fuscogilva*, *H. nobilis* and *H. whitmaei* – as well as *Holothuria (Microthele)* sp. (the ‘pentard’), have a common morphological characteristic that makes them easy to identify (i.e. it is visible in their live, fresh and dried forms): lateral protuberances (teat-like) that are clearly visible on the tegument (Fig. 1). Unlike these three species (+ the ‘pentard’, if accepted as a new species), other commercially important sea cucumbers are very difficult to differentiate from one another, especially for untrained border control agents. However, the effective application of control measures is key to any regulation or prohibition.

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**Figure 1.** Comparison of a teatfish (left) and another sea cucumber species without teats (right) in their dried form.

The possibility of including all sea cucumber species in CITES Appendix II has also been considered, and is based on Annex 2b of Resolution Conf. 9.24 (Rev. CoP15), which allows the listing of non-endangered species that may be confused with species already listed in CITES, in order to make controls possible and to avoid trafficking under false scientific names. However, according to the French SA, such a proposal is currently unrealistic, given the socioeconomic and commercial importance of sea cucumbers, especially for Asian countries (Conand 2018).

### Presenting the listing proposal to the European Union and then to the international level

As a member state of the European Union (EU), France must respect the European regulation of CITES. In particular, this regulation requires that when a member state wishes to submit a proposal for amending CITES Appendices I and II, it must first be accepted by other member states in order to be presented to the next CoP, under the EU delegation. This process of EU delegation to CoP is quite new. It comes from the "Gaborone Amendment", which was adopted at CoP4 (in 1983) in Botswana, which allows a regional organisation to become a full member of CITES (CITES Secretariat 2018b). The EU applied for, and was granted, membership to CITES as a regional organisation in 2013, which became effective in 2015 (it is the only regional organization to do so). As a result, the EU has the votes of all 28 member states.

Therefore, the French SA presented its draft proposal in June 2017 at the 79<sup>th</sup> meeting of the Scientific Review Group, bringing together the SA of each member state (including France) to discuss scientific issues related to European regulations pertaining to CITES (European Commission 2007; MEEM/DEB 2016).

This draft proposal has been favourably received by other EU member states, and was presented at the Animals Committee, the technical committee of scientific experts of the Parties to CITES, in Geneva in July 2018 under the EU delegation. The proposal's acceptance during this committee was not without controversy. Some Asian members were opposed to it, arguing that the proposal was insufficiently documented. On the other hand, European members, Mexico and the non-governmental organisations Wildlife Conservation Society and the Humane Society International have expressed their support, supporting the need to control the currently unsustainable trade of sea cucumbers.

The Animals Committee noted the document and encouraged those Parties and organisations that had any comments or useful information to send them directly to the proponents (CITES Secretariat 2018c).

The proposal is currently online on the CITES website (<https://cites.org/fra/cop/18/prop/index.php>), and will officially be presented by the EU at the next CoP in Colombo, Sri Lanka at the end of May 2019.

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