Petition to Identify the People's Republic of China Under the Moratorium Protection Act for Failing to Adopt Comparable Shark Conservation Measures

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On behalf of the Center for Biological Diversity, we petition the Secretary of Commerce, through the National Marine Fisheries Service ("NMFS"), to "identify" the People's Republic of China ("the PRC") under the High Seas Driftnet Fishing Moratorium Protection Act ("Moratorium Protection Act" or "MPA"). The MPA requires NMFS to identify nations if their fishing vessels have caught sharks on the high seas but the nation has not adopted and implemented shark conservation measures comparable to the United States. 16 U.S.C. § 1826k(a)(1)(B)(i)-(ii). Accordingly, a nation must be identified if it fails to prohibit the removal of shark fins before landing at port or if it fails to ban shark-fin possession and sales, as required in the United States.

As described below, the PRC has targeted or caught sharks on the high seas within the last three years but has failed to adopt and implement shark conservation measures comparable to those of the United States. Indeed, NMFS has previously identified the PRC for "shark catch" in the 2023 Report to Congress under its MPA authority, finding the PRC's shark management measures were not comparable to U.S. measures because the measures "pertain only to tuna fisheries and to the PRC's non-tuna fleet fisheries."[1]

This petition provides updated evidence (2023–2026) demonstrating continued PRC distant-water longline fishing that targets and incidentally catches sharks in Regional Fishery Management Organization ("RFMO") Convention Areas that include waters beyond national jurisdiction,[2] and explains why the PRC still lacks measures comparable to U.S. law—most critically, a binding "fins naturally attached" landing requirement that applies across its fisheries and a comprehensive prohibition on possession and commercial trade in shark fins and fin products. Accordingly, NMFS should again identify the PRC, conduct and/or continue the consultations required by statute, and ensure timely certification determinations consistent with 16 U.S.C. § 1826k and 50 C.F.R. § 300.204.

A. Factual Background

Each year around the globe, an estimated 80 million sharks are killed through targeted catch and incidental bycatch to satisfy demand for their fins and meat.[3] Shark finning is the removal of a shark's fins and then discarding the body at sea, often while the shark is still alive, leading to a slow and agonizing death.[4] As the demand for shark fins continues, particularly in Asia, this practice drives unsustainable fishing, exacerbating the already alarming decline of shark populations.

[1] NMFS, *2023 Report to Congress: Improving International Fisheries Management.* Available at: https://www.fisheries.noaa.gov/s3/2023-08/2023RTC-ImprovingIFManagement.pdf

[2] PRC regulations define "distant water fisheries" to mean fishing on the high seas or in foreign nations´s waters. Distant Water Fisheries Management Provisions (MARA Order No. 2, 2020).

[3] Worm, B., Orofino, S., Burns, E. S., D'Costa, N. G., Manir Feitosa, L., Palomares, M. L., ... & Bradley, D. (2024). Global shark fishing mortality still rising despite widespread regulatory change. *Science*, *383*(6679), 225-230.

[4] Fowler, S. L., et al. (2005). Sharks, rays and chimaeras: The status of the chondrichthyan fishes. *IUCN Species Survival Commission Shark Specialist Group*. https://portals.iucn.org/library/node/8898

Sharks are particularly susceptible to overexploitation due to their slow growth and late sexual maturity.[5] One-third of shark and ray species are now considered to be threatened with extinction globally, with 17% of assessed species considered endangered or critically endangered and three species classified as Critically Endangered and possibly extinct.[6] Over the last 50 years, industrial offshore fishing has reduced the abundance of oceanic sharks by more than 70%.[7] Many sharks play the critical ecological role of apex predator, and their decline and disappearance alters their entire ecosystem.[8]

Numerous nations have enacted regulations to address the threat posed by shark finning and to stem population declines. In the United States, the Shark Conservation Act of 2010 prohibits any person from "remov[ing] any of the fins of a shark (including the tail) at sea" or "land[ing] any shark carcass without such fins naturally attached," referred to as "FNA."[9] 16 U.S.C. § 1857(1)(P)(i), (iv). A 2024 survey of shark finning regulations around the globe concluded that "94 jurisdictions and one RFMO have finning regulations that require fishers to land whole sharks with their fins naturally attached."[10] The United States more recently enacted additional legislation, flatly banning the possession and sale of any shark fins or shark fin products, as detailed below. Pub. L. No. 117-263 § 5946(b), 136 Stat. 3475.

However, some nations allow shark carcasses to be landed with fins *detached* and instead set a fixed fin-to-carcass weight ratio in an effort to ensure the full carcass is being landed, not just the fins. These nations' rules often require that the weight of fins onboard a vessel does not exceed a certain percentage – typically 5% – of the weight of all sharks on board. But these ratio-based shark finning regulations are widely seen as ineffective for conservation. Applying a single ratio ignores biological differences between shark species,[11] making the ratios easy to exploit. Additionally, shark species are often difficult to identify from detached fins, potentially allowing imperiled sharks' fins to be landed and hampering enforcement and accurate data collection and reporting. Experts recommend replacing ratio-based rules with requirements that sharks be landed with fins naturally attached, for both preventing at-sea finning and generating the detailed catch data essential for management of these vulnerable species.[12,13]

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[5] Dulvy, N. K., et al. (2014). Extinction risk and conservation of the world's sharks and rays. *eLife, 3*, e00590. https://doi.org/10.7554/eLife.00590

[6] Dulvy, N. K., et al. (2021). Overfishing drives over one-third of all sharks and rays toward a global extinction crisis. *Current Biology, 31*(21), 4773–4787.e8. https://doi.org/10.1016/j.cub.2021.08.062

[7] Pacoureau, N., et al. (2021). Half a century of global decline in oceanic sharks and rays. Nature, 589(7843), 567–571..

[8] Dedman, S., Moxley, J. H., Papastamatiou, Y. P., Braccini, M., Caselle, J. E., Chapman, D. D., ... & Heithaus, M. R. (2024). Ecological roles and importance of sharks in the Anthropocene Ocean. *Science*, *385*(6708).

[9] The United States exempts one species from this prohibition, the smooth dogfish (*Mustelus canis*). 50 C.F.R. § 600.1201(b).

[10] Worm, B., Orofino, S., Burns, E. S., D'Costa, N. G., Manir Feitosa, L., Palomares, M. L., ... & Bradley, D. (2024). Global shark fishing mortality still rising despite widespread regulatory change. *Science*, *383*(6679), 225-230.

[11] *See* Clarke, S. C., Harley, S. J., Hoyle, S. D., & Rice, J. S. (2013). Population trends in Pacific Oceanic sharks and the utility of regulations on shark finning. Conservation Biology, 27(1), 197-209.

[12] Baker, J. (2014). Plight of an ocean predator: the shark conservation act of 2010 and the future of shark conservation legislation in the United States. *Environs: Envtl. L. & Pol'y J.*, *38*, 67.

[13] Brautigam, A. (2020). *Best practice in the prevention of shark finning*. Marine Stewardship Council. https://www.msc.org/documents/1234-brautigam-2020-best-practice-shark-finning.

The PRC is a central node in the global shark-fin trade network, both as a shark-fishing nation and – along with its Hong Kong SAR – a major end-market and transit hub for shark fins and fin products. Data specifically quantifying China's high-seas shark catch remain incomplete in publicly-available reporting. However, as detailed below, available monitoring reports confirm that Chinese distant-water longline vessels have caught and discarded multiple shark species during observed operations, including in RFMO Convention Areas that encompass both Exclusive Economic Zone ("EEZ") waters and adjacent high seas.[14]

Recent peer-reviewed analysis underscores that, while shark-fin imports declined in recent years, Hong Kong SAR remains the world's largest shark-fin hub, and illegal trade is prevalent. A 2025 *Science Advances* study shows that Hong Kong's total reported shark-fin imports (reported without species-level resolution) declined from approximately 6,000 to 2,000 tons between 2015 and 2021. However, fins from four CITES-listed shark species were still commonly detected in the Hong Kong market, and 80% of exporting nations had never reported any trade in these listed species, suggesting widespread under-reporting and sustained illegal trade.[15] A 2025 peer-reviewed paper focused on China similarly describes Hong Kong as the center of the global shark-fin trade and the "largest and most consistent importer and re-exporter" of shark fins worldwide.[16]

Recent enforcement records also confirm large-volume movements of fins from endangered/CITES-listed species through the Hong Kong–PRC trade corridor. Hong Kong Customs reported seizing over 1.2 tonnes of suspected CITES-listed dried shark fins of endangered species in February 2023, and additional major seizures occurred in February 2024 (about 1.2 tonnes, seaborne container) and February 2024 (about 1.2 tonnes, river-trade smuggling case).[17] These repeated tonne-scale interceptions support the conclusion that consumer demand and commercial trade into and through the PRC/Hong Kong SAR remain a core conservation problem, reinforcing the need for a comparable program that ends commercial sales of fins and fin products.[18]

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[14] Inter-American Tropical Tuna Commission. (2023). *Annual Scientific Observer Report: Chinese Longline Fishery 2023 (SAC-15 INF-A(a)).*

[15] Cardeñosa, D., Babcock, E. A., Shea, S. K., Zhang, H., Feldheim, K. A., Yang, F., Gale, S. W., Fernando, D., Tanna, A., Warwick, L., & Chapman, D. D. (2025). *International trade regulations take a limited bite out of the shark fin trade*. Science Advances, 11(45), eadz2821. https://doi.org/10.1126/sciadv.adz2821

[16] Chu, X.-L. (2025). The review of shark conservation legislation in China: deficiencies and potential avenues for improvement. Biodiversity and Conservation, 34, 2635–2655. https://doi.org/10.1007/s10531-025-03080-3

[17] Hong Kong Special Administrative Region Government, Customs and Excise Department. (2023, February 18). *Hong Kong Customs seizes over 1.2 tonnes of suspected scheduled dried shark fins (with photo).* https://www.info.gov.hk/gia/general/202302/18/P2023021700687.htm; Hong Kong Special Administrative Region Government, Customs and Excise Department. (2024, February 16). *Hong Kong Customs seizes suspected scheduled dried shark fins worth about $3.3 million (with photo).* https://www.info.gov.hk/gia/general/202402/16/P2024021600266p.htm; Hong Kong Special Administrative Region Government, Customs and Excise Department. (2024, February 29). *Hong Kong Customs detects smuggling case involving about 1.2 tonnes of suspected scheduled dried shark fins by river trade vessel (with photos).* https://www.info.gov.hk/gia/general/202402/29/P2024022900423.htm

[18] *Id.*

B. Legal Background

1. U.S. Moratorium Protection Act

Under the High Seas Driftnet Fishing Moratorium Protection Act ("MPA"), the Secretary of Commerce, through its National Marine Fisheries Service ("NMFS"), "shall identify . . . any nation:"

> (i) if any fishing vessel of that nation . . . has engaged during the [previous] 3 years . . . in fishing activities on the high seas . . . that target or incidentally catch sharks; and
>
> (ii) the vessel's flag state has not adopted, implemented, and enforced a regulatory program to provide for the conservation of sharks, including measures to prohibit removal of any of the fins of a shark, including the tail, before landing the shark in port, that is comparable to that of the United States.

16 U.S.C. § 1826k(a)(1)(B)(i)-(ii). The MPA requires NMFS to make these identifications "at any time that the [agency] has sufficient information to make such identification," *id.* § 1826k(a)(2), and NMFS must list those nations in a biennial report to Congress, *id.* §§ 1826k(a)(1); 1826h(a)(2).

The MPA then directs NMFS and the Secretary of State to consult with any identified nations and, within two years, requires that NMFS "shall certify" – either positively or negatively – whether each nation "has provided documentary evidence" that it has "adopt[ed] . . . a regulatory program . . . comparable to that of the United States." *Id.* § 1826k(c)(1)(A), (3); 50 C.F.R. § 300.204(e). NMFS may only issue a "positive" certification if the nation has "provided evidence documenting" that: (1) its shark conservation regulatory program is "comparable in effectiveness" to the United States, and (2) it has "a management plan [for] the collection of species-specific data on sharks" for stock assessments and conservation efforts. 50 C.F.R. § 300.204(e)(1).

The MPA requires specific penalties if NMFS is unable to make the requisite findings. 16 U.S.C. § 1826k(c)(5). First, if a nation is identified under the MPA shark finning provision in two consecutive biennial reports, the Secretary of Homeland Security "shall" withhold port privileges for any fishing vessels of such nation. 16 U.S.C. § 1826a(a)(2)(B). More importantly, if NMFS issues a negative certification, the President "shall" direct relevant agencies "to prohibit the importation . . . of fish and fish products and sport fishing equipment" from the nation. *Id.* § 1826a(b)(3)(A)(i). Additionally, within six months of any negative certification, NMFS must determine whether any import prohibitions issued were "insufficient . . . to address the [nation's] offending activities," and if so, NMFS must certify the nation pursuant to the U.S. Pelly Amendment, which authorizes further import prohibitions. 22 U.S.C. § 1978(a)(5).

2. U.S. Shark Conservation Legislation

The United States has banned shark finning for over 25 years and now bans the possession, sale, and purchase of shark fins and fin products. The Shark Finning Prohibition Act of 2000 amended the Magnuson-Stevens Act to prohibit the removal and discarding of shark fins at sea and require landing of a shark fin with the "corresponding carcass." Pub. L. No. 106–557, 114 Stat. 2772, at (P). The law stated that vessels would be presumed to have violated the prohibition if "the total weight of shark fins landed . . . exceeds 5 percent of the total weight of shark carcasses landed." *Id*.

The Shark Conservation Act of 2010 tightened those restrictions to require that sharks be landed with fins naturally attached, 16 U.S.C. § 1857(1)(P)(i), (iv), to provide for better enforcement and data collection for stock assessments and quota monitoring. The law further prohibited transfer of fins from one vessel to another. *Id*.

In 2023, Congress enacted the Shark Fin Sales Elimination Act as part of the 2022 James M. Inhofe National Defense Authorization Act. The new law states that "no person shall possess, acquire, receive, transport, offer for sale, sell, or purchase a shark fin or product containing a shark fin." 14 Pub. L. No. 117–263 § 5946(b), 136 Stat. 3475. As a result, the United States bans shark finning at sea, landing sharks without fins naturally attached, and the possession and sale of any shark fins and fin products. These approaches have made the United States a leader in the conservation and management of sharks globally.

C. NMFS Must Identify the PRC for High-Seas Shark Catch and for Failing to Adopt Comparable Shark Protection Measures.

We hereby petition NMFS to identify the PRC under the MPA's shark provisions. 16 U.S.C. § 1826k(a)(1)(B). As detailed below, PRC-flagged vessels have targeted or incidentally caught sharks on the

during the previous three years (April 2023-April 2026), and the PRC has not adopted a binding, nationwide, fins-naturally-attached landing requirement that applies throughout its fisheries or banned possession and sale of shark fins, comparable to U.S. law.

1. PRC-Flagged Vessels Target and Incidentally Catch Sharks on the High Seas

a) RFMO Data

Regional fisheries management organization ("RFMO") data definitively demonstrate that the PRC has targeted or incidentally caught sharks on the high seas in the past three years. 16 U.S.C. § 1826k(a)(1)(B)(i). RFMOs compile catch/effort statistics, observer reports, and compliance submissions that document shark catch and bycatch in high-seas tuna and billfish fisheries. The PRC participates in multiple RFMOs and regional fisheries bodies, whose Convention Areas include waters beyond national jurisdiction.[19] RFMO reporting confirms PRC-flagged distant-water fleets' shark interactions and landings within 2023–2024.

[19] Li, S. (2025). Combating IUU fishing: an examination of interaction between China and regional fisheries management organizations. *Frontiers in Marine Science*, *12*, 1601534.

i. Inter-American Tropical Tuna Commission

The PRC is a Party to the Inter-American Tropical Tuna Commission ("IATTC"), which addresses the management of tuna and tuna-like species in the Eastern Pacific Ocean, east of 150°W. Sharks are commonly bycaught in tuna fisheries, and IATTC management measures require shark bycatch reporting.[20] The IATTC Scientific Advisory Committee's latest reports document PRC longline fishing in the IATTC Convention Area, detailing both fishing effort and the bycatch of several shark species in 2023 including on the high seas, as detailed below.[21] Separately, the PRC's annual report to IATTC on implementation of Resolution C-23-07 for 2024 describes PRC shark bycatch and fin-handling requirements for the EPO tuna longline fleet.[22]

The PRC's 2023 IATTC report describes 12 observer trips and substantial longline fishing effort, documenting that sharks were caught and largely discarded. Blue sharks were the most commonly-caught shark species, with 1,356 individuals observed (1,331 released alive, 25 dead). Additional shark taxa included crocodile sharks (21 individuals, released alive), critically endangered oceanic whitetip sharks (24 individuals, 21 released alive, 3 dead), endangered shortfin mako sharks (57 individuals, 46 released alive, 11 dead), and silky sharks (12 individuals, 9 released alive, 3 dead).[23] As part of its report, the PRC submitted a map of observed set stations for the twelve trips, shown in Figure 1. The mapped set locations include offshore areas beyond national jurisdiction, supporting the conclusion that at least some observed shark catches occurred on the high seas.

[20] IATTC Res. C-25-08.

[21] Comisión Interamericana del Atún Tropical. (2024). *Informe anual de los observadores científicos en la pesca con palangre de China en el Área de la Convención de Antigua (2023)* (Documento SAC-15 INF-A(a)). Comité Científico Asesor 15ª Reunión. https://www.iattc.org/ Available at: https://www.iattc.org/getattachment/7c61e7a2-4b35-4bde-96f3-d9200f4bf720/SAC-15-INF-A%28a%29_CHN-Informe-anual-2023.pdf

[22] People's Republic of China, Ministry of Agriculture and Rural Affairs, Bureau of Fisheries. (2025, June 27). Annual report on implementation for 2024 by China on Resolution C-23-07 (Sharks) [Letter to Arnulfo Franco, Director, Inter-American Tropical Tuna Commission]. Inter-American Tropical Tuna Commission. https://www.iattc.org/GetAttachment/ef3765d4-e46f-49c9-a4b0-4bf8df3cfe1c/CHN-C-05-03-C-16-04_Sharks.pdf

[23] Comisión Interamericana del Atún Tropical. (2024). *Informe anual de los observadores científicos en la pesca con palangre de China en el Área de la Convención de Antigua (2023)* (Documento SAC-15 INF-A(a)). Comité Científico Asesor 15ª Reunión. https://www.iattc.org/ Available at: https://www.iattc.org/getattachment/7c61e7a2-4b35-4bde-96f3-d9200f4bf720/SAC-15-INF-A%28a%29_CHN-Informe-anual-2023.pdf

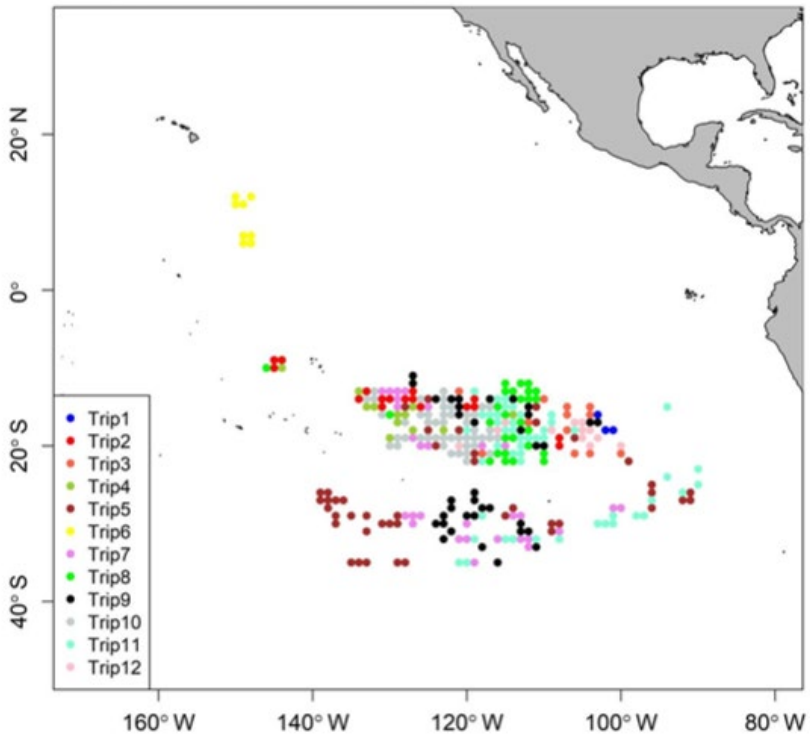

Fig. 1 Longline Stations in the IATTC Convention Area (2023). The map illustrates the spatial distribution of twelve scientific observer trips conducted on PRC-flagged longline vessels within the eastern Pacific Ocean.[24]

In its 2024 annual report to IATTC on implementation (Resolution C-23-07), the PRC reports 23 observer deployments and provides observer-recorded shark outcomes as released alive, dead, and condition unknown for multiple shark species.[25] The observed vessels caught 12 different shark species. Again, blue sharks were the most commonly-caught species, with 2,791 individuals caught (844 released, 56 dead, and 1891 condition unknown). Additional shark taxa included crocodile sharks (40 released, 6 dead, 61 condition unknown), oceanic whitetip sharks (38 released, 4 dead, 27 condition unknown), shortfin mako (35 released, 19 condition unknown), and big-eye thresher sharks (7 released, 24 condition unknown).[26] As part of its report, the PRC submitted a map of the observed set stations for the 23 trips, shown in Figure 2. According to the map, some if not all of these catches were on the high seas.

[24] Comisión Interamericana del Atún Tropical. (2024). *Informe anual de los observadores científicos en la pesca con palangre de China en el Área de la Convención de Antigua (2023)* (Documento SAC-15 INF-A(a)). Comité Científico Asesor 15ª Reunión. https://www.iattc.org/ Available at: https://www.iattc.org/getattachment/7c61e7a2-4b35-4bde-96f3-d9200f4bf720/SAC-15-INF-A%28a%29_CHN-Informe-anual-2023.pdf

[25] People's Republic of China, Ministry of Agriculture and Rural Affairs, Bureau of Fisheries. (2025, June 27). Annual report on implementation for 2024 by China on Resolution C-23-07 (Sharks) [Letter to Arnulfo Franco, Director, Inter-American Tropical Tuna Commission]. Inter-American Tropical Tuna Commission. https://www.iattc.org/GetAttachment/ef3765d4-e46f-49c9-a4b0-4bf8df3cfe1c/CHN-C-05-03-C-16-04_Sharks.pdf

[26] *Id.*

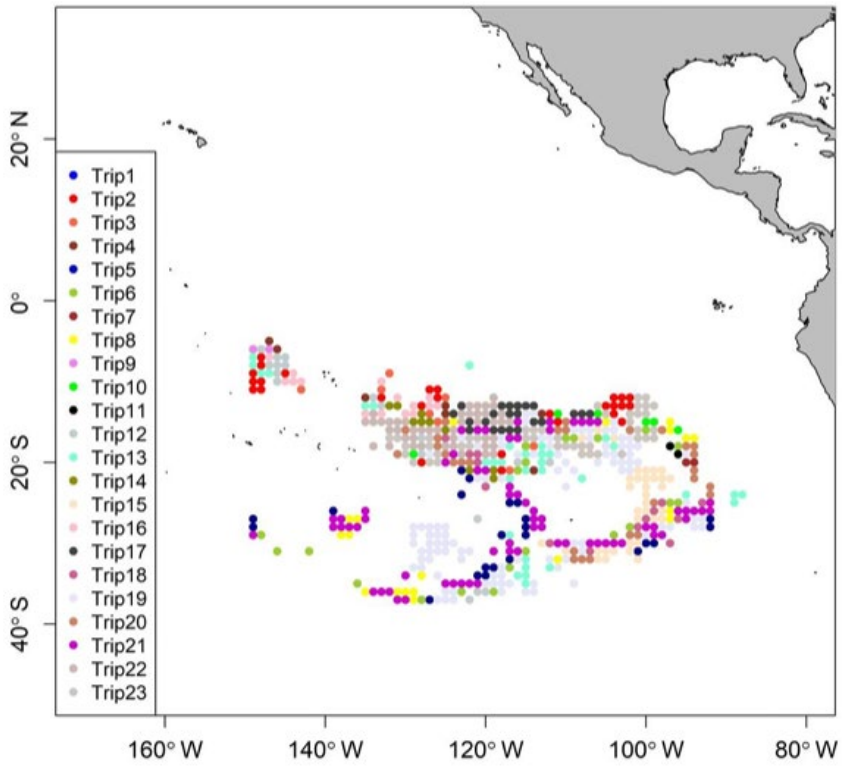

Figure 2. Set stations of Chinese longline observer trips conducted in 2024. These trips were part of China's longline tuna fishery operations in the Eastern Pacific Ocean (EPO) within the IATTC convention area. The figure visually maps the geographical locations where the longline sets were deployed during the 23 observer trips. These trips targeted albacore tuna and primarily used circle hooks as the fishing gear. The figure provides a spatial overview of the fishing activity distribution across the observed areas.[27]

Moreover, the IATTC also publishes a public dataset that summarizes shark catch and longline effort in the eastern Pacific by year, month, flag State, and 5°×5° grid cell ("PublicLLShark.zip"). Using the PRC records for 2022–2024, the map below shows where PRC-flagged longliners reported shark catch across the IATTC Convention Area, including offshore areas that extend well into the high seas.

[27] People's Republic of China, Ministry of Agriculture and Rural Affairs, Bureau of Fisheries. (2025, June 27). Annual report on implementation for 2024 by China on Resolution C-23-07 (Sharks) [Letter to Arnulfo Franco, Director, Inter-American Tropical Tuna Commission]. Inter-American Tropical Tuna Commission. https://www.iattc.org/GetAttachment/ef3765d4-e46f-49c9-a4b0-4bf8df3cfe1c/CHN-C-05-03-C-16-04_Sharks.pdf

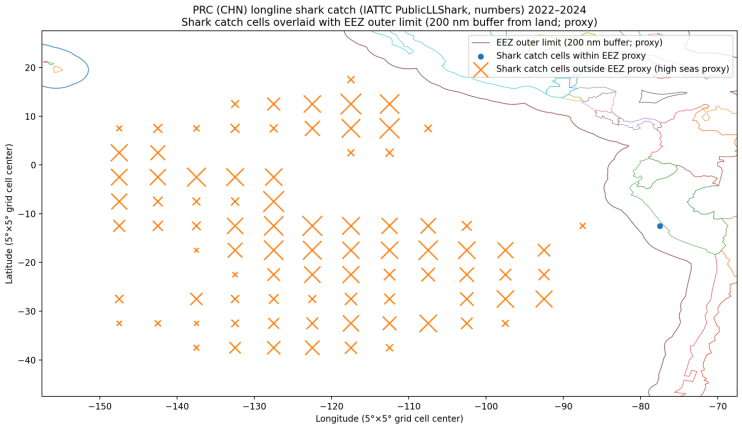

Figure 3. Plots the center of each 5°×5° grid cell where the PRC (CHN) reported shark catch in the IATTC public longline shark dataset (2022–2024). The EEZ outer-limit line (shown as a 200-nautical-mile proxy) helps illustrate that most PRC shark catch cells in this dataset occur outside coastal EEZs, consistent with offshore/high-seas pelagic longline operations.[28]).

ii. ICCAT

The PRC is also a Party to the International Commission for the Conservation of Atlantic Tunas ("ICCAT"), which manages tuna and tuna-like species (and associated bycatch) in the Atlantic Ocean. The PRC's ICCAT reporting explains that sharks are among the "important by-catch species" for PRC longline operations and are required to be recorded in logbooks.[29] In its reporting on 2023 catch statistics, the PRC reported a total blue shark catch of 76.09 t (up from 18.08 t in 2022) and reported no retained shortfin mako, but shortfin mako discards totaling 19.73 t (6.92 t dead; 12.81 t live), with discards disaggregated by condition (dead/alive).[30]

ICCAT maintains spatially resolved catch-and-effort datasets, including longline records typically reported at 5°×5° resolution, and nominal catch summaries that are, where possible, separated between EEZ and high seas. However, PRC's public reporting of annual shark catch/discard totals does not, by itself, assign those shark totals to specific locations and thus does not document whether catch occurred in the high seas or in an EEZ. However, PRC longline operations reporting to ICCAT fish across large offshore areas (including observer-covered operations reported in 2023 across broad Atlantic coordinate ranges), indicating that PRC longline fisheries associated with reported shark catch/discards operate in waters that include extensive high-seas areas within the ICCAT Convention Area.

Finally, peer-reviewed evidence links China's distant-water tuna longline operations to shark bycatch in open-ocean fisheries in the North Atlantic Ocean. A peer-reviewed study using

[28] Source: Shark catch points are from IATTC public-domain dataset "Shark EPO longline catch and effort aggregated by year, month, flag, 5°×5°" (PublicLLShark.zip), PRC/CHN records, 2022–2024. EEZ and "high seas" reference boundaries are shown using an EEZ outer-limit (200 nautical mile) proxy derived from global coastline polygons (Natural Earth); this is a visualization aid and not a legal EEZ delimitation.

[29] ICCAT Biennial Report (2024–25, Part I (2024) Vol. 3) at 178. Available at: https://www.iccat.int/Documents/BienRep/REP_TRILINGUAL_24-25_I_3.pdf

[30] Id.

observer data from China's distant-water tuna longline fleet in the North Atlantic identifies blue shark as among the most commonly caught bycatch species.[31]

iii. WCPFC

The PRC is an active member (party) of the Western and Central Pacific Fisheries Commission ("WCPFC"), which manages highly migratory fish stocks, including tuna, marlins, and swordfish, across a vast region that includes both EEZ waters and adjacent high seas (i.e., areas beyond national jurisdiction). The WCPFC Convention Area covers an enormous portion of the Pacific – nearly one-fifth of Earth's surface – and spans areas where distant-water longline fleets operate across EEZ and high-seas boundaries.[32]

China's most recent Annual Report (Part 1) to the WCPFC states that Chinese-flagged longline vessels in the Convention Area operated on the high seas and in the EEZs of Pacific Island countries.[33] The report also provides China's longline non-target catch data, which reports shark interactions as "Sharks (individuals discard)" and shows the following shark discards:[34]

- 2023: Blue shark 10,397; Shortfin mako 1,672; Oceanic whitetip 688.
- 2024: Blue shark 24,840; Shortfin mako 48; Oceanic whitetip 64.

These official RFMO-submitted data confirm that PRC longline vessels in the WCPFC Convention Area that operate in both foreign EEZs and on the high seas have caught and discarded sharks within the last three years.

iv. IOTC

The PRC is a Contracting Party to the Indian Ocean Tuna Commission (IOTC), which is responsible for managing tuna and tuna-like fish in the Indian Ocean, including on both the high seas and within EEZs.[35] Sharks are frequently caught – and in some cases are targeted – in those fisheries.[36]

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[31] Xia, M., Carruthers, T., Kindong, R., Dai, L., Geng, Z., Dai, X., & Wu, F. (2023). Quantifying bycatch risk factors for the Chinese distant water fishery. ICES Journal of Marine Science, 80(3), 507-517.

[32] Western and Central Pacific Fisheries Commission. (2025, November 27). Convention and map. https://www.wcpfc.int/about/convention-and-map

[33] Western and Central Pacific Fisheries Commission. (2025, July 7). *Annual report to the Commission—Part 1: Information on fisheries, research and statistics: China (WCPFC-SC21-AR/CCM-03).* https://meetings.wcpfc.int/file/17656/download (Accessed January 15, 2026).

[34] Id.

[35] Indian Ocean Tuna Commission. Structure of the Commission (Contracting Parties; China listed as a Member). https://iotc.org/about-iotc/structure-commission ; Indian Ocean Tuna Commission. Status summary for species under the IOTC mandate and other species impacted by IOTC fisheries (includes statement that sharks are frequently caught and sometimes targeted; fisheries occur on high seas and in EEZs). https://iotc.org/science/status-summary-species-tuna-and-tuna-species-under-iotc-mandate-well-other-species-impacted-iotc

[36] Indian Ocean Tuna Commission. (n.d.). Structure of the Commission (Contracting Parties/Members). Retrieved January 16, 2026, from https://iotc.org/about-iotc/structure-commission

Unlike some other RFMOs, the IOTC does not provide publicly available shark catch statistics by nation or flag state.[37] However, recent IOTC reports document substantial, aggregated shark catches/bycatch in IOTC fisheries, including by longline vessels operating in offshore waters. The IOTC Secretariat's review of bycatch statistics concludes that longline fleets predominantly reported catches of blue shark, followed by mako and silky sharks.[38] The IOTC Scientific Committee's most recent report also provides updated fishery indicators through 2024, including reported blue shark catch of 9,562 t in 2024 and (nei) sharks of 15,742 t in 2024.[39]

Actual shark catch and bycatch in the IOTC Convention Area is likely much greater than the reported aggregate data. The IOTC itself has emphasized the need for verified catch data and acknowledged persistent under-reporting issues for sharks. The IOTC has adopted a Regional Observer Scheme to collect verified catch data and other scientific information.[40] In addition, the IOTC's current consolidated shark measure notes "continued failure" by Contracting Parties to submit complete, accurate, and timely shark catch records and underscores the need to improve species-specific catch/discard reporting.[41]

Taken together, IOTC's descriptions of high-seas tuna fisheries, its recent scientific reporting on shark catches and bycatch, and its repeated emphasis on under-reporting and the need for verified observer-based data confirm that shark interactions occur frequently in pelagic longline operations in the Indian Ocean. In light of the PRC's documented participation in these fisheries and its broader distant-water footprint, the IOTC record further supports the conclusion that PRC-flagged longline operations are likely to catch sharks in water of the high seas during the relevant period

b) Global Fishing Watch Data

The Global Fishing Watch ("GFW") AIS-based apparent fishing effort dataset (Figure 3) documents substantial PRC distant-water fishing activity in areas beyond national jurisdiction. While the Global Fishing Watch layer does not identify target species, it provides a spatial indicator of PRC-flagged industrial fishing activity, which overlaps with fisheries (particularly pelagic longline fleets) that peer-reviewed syntheses identify as major sources of shark

[37] Indian Ocean Tuna Commission. (n.d.). Status summary for species of tuna and tuna-like species under the IOTC mandate, as well as other species impacted by IOTC fisheries. Retrieved January 16, 2026, from https://iotc.org/science/status-summary-species-tuna-and-tuna-species-under-iotc-mandate-well-other-species-impacted-iotc

[38] Indian Ocean Tuna Commission Secretariat. (2023). Review of the statistical data available for IOTC bycatch species (WPEB19) (concludes longline fleets predominantly reported blue shark catches, followed by mako and silky sharks). https://iotc.org/sites/default/files/documents/2023/09/IOTC-2023-WPEB19-07_Rev2_-_Data_0.pdf

[39] Indian Ocean Tuna Commission. (2025). Report of the 28th Session of the IOTC Scientific Committee (SC28) (includes 2024 fishery indicators for sharks, including blue shark and "nei sharks"). https://iotc.org/sites/default/files/documents/2026/01/IOTC-2025-SC28-RE_rev1.pdf

[40] Indian Ocean Tuna Commission. (n.d.). Regional Observer Scheme: Science (Resolution 22/04). Retrieved January 16, 2026, from https://iotc.org/science/regional-observer-scheme-science

[41] Indian Ocean Tuna Commission. (2025). Resolution 25/08 on the conservation of sharks caught in association with fisheries managed by IOTC. https://iotc.org/sites/default/files/documents/compliance/cmm/iotc_cmm_2508.pdf

interactions on the high seas. Pelagic longline fisheries have been found to have the highest shark bycatch ratios across major commercial gear types, indicating a strong structural linkage between longline effort and shark bycatch risk.[42] Global syntheses of tuna-RFMO data similarly identify shark interaction "hotspots" across all ocean basins and emphasize that industrial longliners have near-global distribution on the high seas and routinely capture sharks incidentally (and in some regions as retained catch).[43]

GFW and WCPFC data together corroborate PRC shark fishing on the high seas from two independent angles. The GFW map (Figure 4) shows PRC-flagged vessels fishing extensively in offshore waters, including areas beyond national jurisdiction. WCPFC data then fill in the picture: they show that PRC longliners operating in those same Pacific waters catch and discard significant numbers of sharks. In short, GFW establishes the geographic footprint of PRC distant-water fishing, and WCPFC observer and catch records confirm that sharks are a regular consequence of that activity.[44, 45]

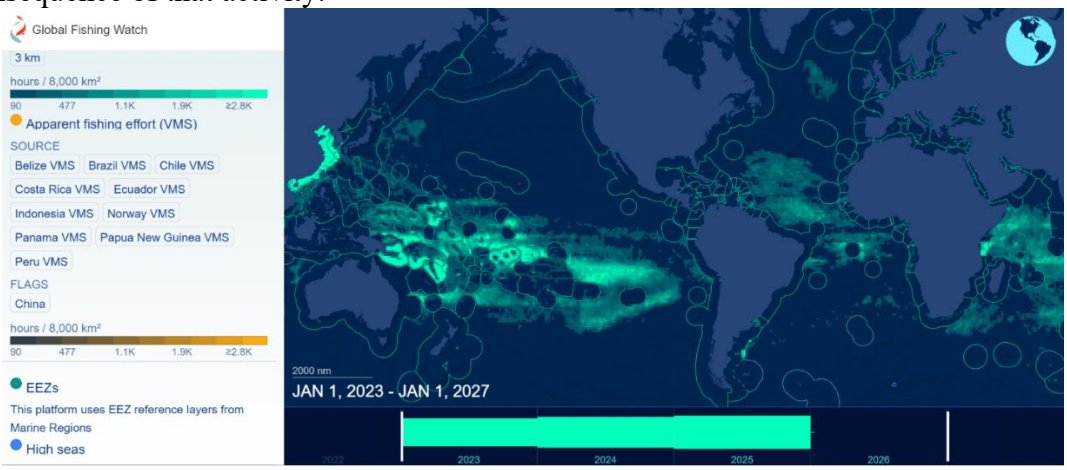

Figure 4. Global Fishing Watch AIS-based apparent fishing effort for vessels flagged to China, 1 Jan 2023–1 Jan, 2027 (snapshot). Heatmap shows estimated fishing effort expressed as hours per 8,000 km² (scale varies with zoom; snapshot shown at ~3 km resolution). EEZ reference boundaries (Marine Regions) and "High seas" reference layer are displayed.[46]

[42] Oliver, S., Braccini, M., Newman, S. J., & Harvey, E. S. (2015). Global patterns in the bycatch of sharks and rays. Marine Policy, 54, 86–97. https://doi.org/10.1016/j.marpol.2014.12.017

[43] Burns, E. S., Bradley, D., & Thomas, L. R. (2023). Global hotspots of shark interactions with industrial longline fisheries. Frontiers in Marine Science, 9, 1062447. https://www.frontiersin.org/articles/10.3389/fmars.2022.1062447/full

[44] Western and Central Pacific Fisheries Commission. (2025, June 2). Public domain aggregated catch/effort data. https://www.wcpfc.int/public-domain-aggregated-catcheffort-data

[45] Western and Central Pacific Fisheries Commission. (n.d.). Public domain bycatch data (BDEP). Retrieved January 16, 2026, from https://www.wcpfc.int/public-domain-bycatch ; Western and Central Pacific Fisheries Commission. (n.d.). Public domain bycatch data files (download page). Retrieved January 16, 2026, from https://www.wcpfc.int/bycatch-data-files

[46] Global Fishing Watch Map, "Apparent fishing effort (VMS)" layer; Flag filter: China; date range 1 Jan 2023–1 Jan 2027; screenshot captured 16 Jan 2026 (EEZ reference layer credited in-map to Marine Regions). Global Fishing Watch defines "apparent fishing effort" as algorithmically inferred fishing activity derived from vessel tracking data (including AIS and, for partner layers, VMS), intended to visualize patterns of fishing activity and not to verify catch composition or target species

2. The PRC Has Not Adopted, Implemented, and Enforced a Shark Conservation Program Comparable to the United States.

As documented in Section 1, PRC vessels target and incidentally catch sharks on the high seas, based both on RFMO reporting and the operational footprint of PRC distant-water pelagic fisheries.[47] However, the PRC has not adopted and implemented a shark conservation program comparable to the United States because it does not require sharks to be landed with fins naturally attached across all of its fishing fleets, and it does not impose a comprehensive ban on the possession and sale of shark fins and shark fin products.

First, the PRC manages shark fishing through several regulations and policy instruments, but the PRC does not require that sharks be landed with fins naturally attached to the carcass in all of its fisheries.[48] As detailed below, the PRC has adopted national-level measures addressing shark finning in most PRC distant-water tuna fisheries that only require a fin-to-carcass ratio approach (capping retained fins at 5% of shark body weight until first landing) and merely encourage (rather than require) practices such as keeping fins naturally attached or bundling/marking fins to corresponding carcasses.[49] While the PRC now requires its Eastern Pacific tuna fisheries to land sharks with fins naturally attached or use alternative options that attempt to require that shark carcass be landed with its corresponding fins, these provisions do not apply to all PRC fisheries operating in other oceans. The PRC's measures are not comparable to U.S. law, which has long prohibited removing shark fins at sea and requires landing sharks with fins naturally attached.

Second, PRC has not adopted a comparable national program banning the possession and sale of shark fins and shark fin products. While PRC adopted restrictions on serving shark-fin dishes in official receptions, these measures are limited in scope and do not constitute a nationwide ban on commercial possession and sale comparable to U.S. prohibitions.[50]

a) The PRC's Shark-Related Regulations

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[47] Pacoureau, N., Rigby, C. L., Kyne, P. M., Sherley, R. B., Winker, H., Carlson, J. K., et al. (2021). Half a century of global decline in oceanic sharks and rays. Nature, 589(7843), 567–571. https://doi.org/10.1038/s41586-020-03173-9 ; Xia, S. (2025). The spatial distribution dynamics of shark bycatch by the longline fishery in the Western and Central Pacific Ocean. Journal of Marine Science and Engineering, 13(2), 315. https://doi.org/10.3390/jmse13020315

[48] Chu, X.-L. (2025). The review of shark conservation legislation in China: Deficiencies and potential avenues for improvement. Biodiversity and Conservation, 34, 2635–2655. https://doi.org/10.1007/s10531-025-03080-3 (ce3c.pt)

[49] Ministry of Agriculture and Rural Affairs of the People's Republic of China (MARA). (2019, February 20). 农业农村部办公厅关于进一步严格遵守金枪鱼国际管理措施的通知 [Notice on further strictly complying with international tuna management measures].

[50] General Office of the CPC Central Committee & General Office of the State Council. (2013). 中共中央办公厅 国务院办公厅印发《党政机关国内公务接待管理规定》 [Regulation on the management of domestic official reception for Party and Government organs]. 国务院公报 (2013年第35号). https://www.gov.cn/gongbao/content/2013/content_2547136.htm ; Pew Charitable Trusts. (2014, March 6). Shark fin trade: Government support crucial for action in China. https://www.pewtrusts.org/en/research-and-analysis/articles/2014/03/06/shark-fin-trade-government-support-crucial-for-action-in-china (China Daily)

Several PRC regulations govern shark fisheries, as listed below. However, the PRC does not require "fins naturally attached" ("FNA") at landing in all of its fisheries or generally ban possession/sale of shark fins and fin products comparable to U.S. law.

PRC shark-related legal instruments include:[51]

1. **Distant Water Fisheries Management Provisions (MARA Order No. 2, 2020):** These regulations, issued by PRC's Ministry of Agriculture and Rural Affairs ("MARA"), establish licensing, vessel monitoring system requirements, data reporting, and observer systems for PRC distant-water fishing, which include high-seas operations and fishing taking place in foreign
2. nations' waters. The regulations do not specifically address sharks.[52]

3. **MARA Tuna-Fisheries International Compliance Notice (2022):** This policy sets requirements for PRC tuna fleets, including RFMO requirements for PRC tuna fleets. The Notice contains several shark-related requirements. It specifies:

> Our ministry does not approve offshore fishing projects that mainly catch sharks. All tuna companies and fishing vessels should take effective measures to avoid or reduce the fishing of sharks as much as possible. Except for sharks that are prohibited from being kept on board by the International Tuna Organization, tuna longline fishing vessels should make full use of bycatch sharks (that is, keep the entire fish body and fins except the head, viscera and skin until the first unloading port), and shall not take fins and discard the body. The weight of shark fins retained on board shall not exceed 5% of the shark's body weight until the fishing vessel arrives at the first unloading port. Fishing vessels are encouraged to take measures such as naturally connecting shark fins to shark bodies, tying them, or marking them accordingly." [53]

Accordingly, while the Notice bans finning and discarding of the body at sea, it only requires a fin-to-body weight ratio (5%) at port and does not require sharks to be landed with fins naturally attached. These requirements also only apply to PRC tuna fisheries, not other non-tuna fleets.[54] In reviewing the PRC's regulatory program in 2023, NMFS

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[51] *See* Chu, X. L., & Zhang, L. (2025). *The review of shark conservation legislation in China* (summarizing relevant shark-related laws in PRC).

[52] Ministry of Agriculture and Rural Affairs of the People's Republic of China. (2020, February 10). 中华人民共和国农业农村部令2020年 第2号：远洋渔业管理规定 [Order No. 2 of 2020: Distant water fisheries management provisions]. https://www.moa.gov.cn/govpublic/YYJ/202003/t20200310_6338553.htm

[53] Ministry of Agriculture and Rural Affairs of the People's Republic of China. (2022, March 10), Sec. 10.1. 农业农村部办公厅关于做好金枪鱼渔业国际履约工作的通知 [Notice on fulfilling international compliance for tuna fisheries]. https://www.moa.gov.cn/govpublic/YYJ/202203/t20220310_6391428.htm

[54] Ministry of Agriculture and Rural Affairs of the People's Republic of China. (2022, March 10). 农业农村部办公厅关于做好金枪鱼渔业国际履约工作的通知 [Notice on fulfilling international compliance for tuna fisheries]. https://www.moa.gov.cn/govpublic/YYJ/202203/t20220310_6391428.htm

found PRC's regulations not comparable, in part because the rules do not pertain to the PRC's non-tuna fishing fleets.[55]

This Notice contains additional shark-conservation measures, including prohibiting the retention of: bigeye thresher sharks, "longfin" sharks, hammerhead sharks, silky sharks, and North Atlantic mako sharks in the Atlantic Ocean; thresher sharks and longfin sharks in the Indian Ocean; longfin sharks and silky sharks in the Western Pacific, and whitetip sharks in the Eastern Pacific. The species' scientific names are not identified in the Notice, so it is unclear which species is referred to as the "longfin" shark. The Notice also sets a quota for blue sharks in the Atlantic.

4. **Wildlife Protection Law (as amended) and related implementing instruments:** This law provides protection for designated "key protected" wildlife, including a general prohibition on killing.[56] Only three shark species are listed as "National Key Protected Wildlife": white shark, whale shark, and basking shark.[57] However, these instruments do not mandate FNA landings across shark fisheries or ban possession and commercial trade of all shark fins and fin products.

5. **Domestic Official Reception Regulation (Zhongbanfa [2013] No. 22):** This regulation prohibits serving "high-end" dishes including shark fin at official receptions but is limited in scope and is not a nationwide prohibition on shark-fin possession and sale.[58]

6. **Notice on Further Strengthening the Conservation of Distant-Water Shark Resources (2024):** This notice announces the PRC's commitment to conservation and sustainable use of sharks and avoid illegal fishing. It directs fishers to "strictly comply" with all RFMO shark conservation measures.[59] However, the Notice does not appear to add any additional requirements for distant-water fishers.

7. **Implementation Elements of the Eastern Pacific Tuna Fisheries (2024 Version):** In a 2025 report to the IATTC, the PRC summarized a new policy adopted by the Ministry of Agriculture and Rural Affairs of China in 2024.[60] This policy, which applies only to the

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[55] Coit, Janet et al., 2023 Report to Congress: Improving International Fisheries Management, NOAA, 46 (Aug. 2023)

[56] National People's Congress of the People's Republic of China. (2022, December 30). Wildlife Conservation Law of the People's Republic of China (Translation for reference only). https://en.npc.gov.cn.cdurl.cn/2022-12/30/c_1085104.htm

[57] National Forestry and Grassland Administration & Ministry of Agriculture and Rural Affairs of the People's Republic of China. (2021, February 1). List of National Key Protected Wildlife (**国家重点保**护野生动物名录) [PDF]. https://www.moa.gov.cn/xw/bmdt/202102/P020210205564727206658.pdf.

[58] Guangdong Provincial Health Commission. (2013, December 8). 党政机关国内公务接待管理规定（中办发〔2013〕22号）[Regulation on domestic official receptions by Party and government organs]. https://wsjkw.gd.gov.cn/zcfgk01/content/post_2227447.html

[59] Ministry of Agriculture and Rural Affairs of the People's Republic of China (2024, September 10). Notice on Further Strengthening the Conservation of Distant-Water Shark Resources (in Chinese), https://www.moa.gov.cn/govpublic/YYJ/202410/t20241009_6463986.htm?utm_

[60] People's Republic of China, Ministry of Agriculture and Rural Affairs, Bureau of Fisheries. (2025, June 27). Annual report on implementation for 2024 by China on Resolution C-23-07 (Sharks) [Letter to Arnulfo Franco,

PRC's *Eastern Pacific* tuna fisheries, states that "shark finning (i.e., keeping fin and discarding carcass) is prohibited." To implement the provision, the PRC requires that:

> [f]ishing vessels . . . shall keep shark fins naturally attached, or . . . shall store each individual shark carcass and its corresponding fins in the same bag made of biodegradable materials; or bind each individual shark carcass to the corresponding fins using rope or wire; or use identical and uniquely numbered tags to attach to each shark carcass and its corresponding fins and both the carcasses and fins shall be stored on board in the same hold so as to be easily identified the matching of the carcass and fins at any time."[61]

Finally, the 2024 policy sets a limit for silky sharks, requiring that "[t]he weight of sickle [silky] sharks caught by longline fishing vessels should not exceed 20% of the total catch for a single voyage."[62]

Collectively, these instruments confirm that the PRC has not adopted and implemented a shark conservation program comparable to the United States throughout its fisheries operating around the globe. With the exception of tuna fisheries operating in the Eastern Pacific, the PRC's distant-water fisheries regulations do not require sharks to be landed with fins naturally attached, and instead, they permit fins to be separated at sea subject to a fin-to-body ratio cap in tuna fisheries.[63] This approach is not comparable to U.S. law, which prohibits removing fins at sea and requires that sharks be landed with fins naturally attached in all U.S. fisheries operating anywhere around the globe.

Moreover, PRC has not enacted a nationwide ban on possession and sale of shark fins and fin products. The Domestic Official Reception Regulation is narrowly limited to official government meals and does not regulate the general commercial market.[64] Likewise, PRC's wildlife protection framework and the National Key Protected Wildlife List apply only to a limited subset of species and do not constitute a comprehensive prohibition on fin possession, sale, or distribution across shark species in trade.[65] Finally, peer-reviewed analysis concludes

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Director, Inter-American Tropical Tuna Commission]. Inter-American Tropical Tuna Commission. https://www.iattc.org/GetAttachment/ef3765d4-e46f-49c9-a4b0-4bf8df3cfe1c/CHN-C-05-03-C-16-04_Sharks.pdf. We were unable to locate an official version of the policy on a PRC government website. However, a copy of the regulation appears to be available here: https://finance-sina-com-cn.translate.goog/jjxw/2024-11-08/doc-incvzsen1143692.shtml?_x_tr_sl=zh-CN&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=sc.

[61] *Id.*

[62] *Id.*

[63] Ministry of Agriculture and Rural Affairs of the People's Republic of China. (2022, March 10). Notice of the General Office on issuing "Key points for international compliance in tuna fisheries (2022)" (**附件：金枪鱼渔业国际履约要点（2022）**) [In Chinese]. https://www.moa.gov.cn/govpublic/YYJ/202203/t20220328_6391428.htm

[64] General Office of the CPC Central Committee & General Office of the State Council. (2013). Regulations on the management of domestic official receptions by Party and government organs (**党政机关国内公务接待管理规定**) (Zhongbanfa [2013] No. 22). https://www.gov.cn/gongbao/content/2013/content_2547136.htm

[65] National People's Congress of the People's Republic of China. (2022). Wildlife Protection Law of the People's Republic of China (Revised 2022) [English translation "for reference only"]. https://en.npc.gov.cn.cdurl.cn/2022-12/30/c_1085104.htm ; National Forestry and Grassland Administration &

that PRC's shark conservation framework remains fragmented and deficient in key respects, reinforcing that PRC lacks a comprehensive program comparable to U.S. fins-attached and fin-trade prohibitions.[66]

D. Conclusion and Request (People's Republic of China)

For the reasons set forth above, the Center respectfully petitions NMFS to promptly identify the People's Republic of China under the Moratorium Protection Act for failing to adopt and implement shark conservation measures comparable to those of the United States. The record demonstrates that PRC distant-water pelagic longline fisheries operate on the high seas and both captured and discarded sharks during the last three years. The PRC has also not adopted a comparable regulatory program that (i) prohibits removal of shark fins prior to landing through a binding "fins naturally attached" requirement and (ii) prohibits possession and sale of shark fins and fin products.

NMFS previously identified the PRC for its shark catch in its 2023 MPA Report to Congress. This petition provides updated information supporting renewed identification and underscores the need for timely certification consistent with 16 U.S.C. § 1826k and 50 C.F.R. § 300.204.

Accordingly, we respectfully request that NMFS:

1. Identify the PRC pursuant to 16 U.S.C. § 1826k(a)(1)(B), for its high-seas shark catch taking place during the last three years (April 2023-April 2026), as warranted by the best available information.

2. Initiate/continue consultations with the Government of the PRC, as required under 16 U.S.C. § 1826k(c), to encourage adoption of (a) a binding fins-naturally-attached requirement for all its fisheries and (b) a comprehensive ban on possession, transport, sale, and purchase of shark fins and fin products.

3. Ensure timely certification determinations consistent with the statutory timeline and implementing regulations.

4. Promptly implement all required consequences associated with a negative certification, including import prohibitions and any further escalation mechanisms authorized by law, where warranted.

By taking these actions, NMFS can help close a serious gap in international shark conservation and uphold the statutory goals of the Moratorium Protection Act.

Ministry of Agriculture and Rural Affairs of the People's Republic of China. (2021, February 1). List of National Key Protected Wildlife (**国家重点保**护野生动物名录) [PDF]. https://www.moa.gov.cn/xw/bmdt/202102/P020210205564727206658.pdf

[66] Chu, X.-L. (2025). The review of shark conservation legislation in China: Deficiencies and potential avenues for improvement. Biodiversity and Conservation, 34, 2635–2655. https://doi.org/10.1007/s10531-025-03080-3

We further note that, under the MPA, within two years of its identification of the PRC, NMFS was required to certify whether the PRC has provided documentary evidence that it has adopted a comparable regulatory program. 16 U.S.C. § 1826k(c)(1)(A), (3); 50 C.F.R. § 300.204(e). Based on the evidence presented above, it is clear that NMFS must negatively certify the PRC because it still lacks a comparable regulatory program to the United States. 50 C.F.R. § 300.204(e)(1). NMFS should complete the overdue certification process and, if it issues a negative certification, implement the required consequences, including withholding port privileges and imposing applicable import prohibitions. Relatedly, NMFS has not issued its 2025 MPA Report to Congress, which was due on June 1, 2025. *See* 16 U.S.C. § 1826h(a).

We appreciate your consideration of this petition and stand ready to provide further information or support as needed. All citations in this petition are available here, and we will additionally send a hard copy of this petition, with a USB drive containing electronic versions of all cited materials.

Respectfully submitted,

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