1	Shark and ray trade in and out of Indonesia:
2	addressing knowledge gaps on the path to
3	sustainability
4	
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20 21 22	Abstract
23	Indonesian marine resources are among the richest on the planet, sustaining highly
24	diverse fisheries. These fisheries include the largest shark and ray landings in the
25	world, making Indonesia one of the world's largest exporters of elasmobranch
26	products. Socio-economic and food security considerations pertaining to Indonesian
27	communities add further layers of complexity to the management and conservation of
28	these vulnerable species. This study investigates the elasmobranch trade flows in and
29	out of Indonesia and attempts to examine patterns and drivers of the current scenario.
30	We identify substantial discrepancies between reported landings and declared
31	exports, and between Indonesian exports in elasmobranch fin and meat products and

32 the corresponding figures reported by importing countries. These mismatches are

33 estimated to amount to over \$43.6 M and \$20.9 M for fins and meat, respectively, for 34 the period between 2012 and 2018. Although the declared exports are likely to be an 35 underestimation because of significant unreported or illegal trading activities, we note 36 that domestic consumption of shark and ray products may also explain these 37 discrepancies. The study also unearths a general scenario of unsystematic data collection and lack of granularity of product terminology, which is inadequate to meet 38 39 the challenges of over-exploitation, illegal trade and food security in Indonesia. We 40 discuss how to improve data transparency to support trade regulations and 41 governance actions, by improving inspection measures, and conserving 42 elasmobranch populations without neglecting the socio-economic dimension of this 43 complex system.

44 **1.** Introduction

45 The rapid depletion of sharks and rays (hereafter referred to collectively as just 46 'elasmobranchs') in many marine ecosystems is now recognized as a global 47 conservation priority (Dulvy et al., 2014; MacNeil et al., 2020). Conservative life-48 histories (Mardhiah et al., 2019) make elasmobranchs vulnerable to fisheries 49 overexploitation (ICES, 2016; Reynolds et al., 2005), which in turn can destabilise 50 ecosystem structure (Sherman et al., 2020) and ultimately decrease global functional 51 diversity (Pimiento et al., 2020). Overexploitation of elasmobranch resources is driven 52 by a complex interplay between general expansion of global fisheries, with high-levels 53 of elasmobranch by-catch, plus demand for high value fins from certain species (Clarke et al., 2006; Dulvy et al., 2014). Despite increasing regulations in international 54 55 trade in recent years (e.g. under the Convention on International Trade in Endangered Species of Wild Fauna and Flora - CITES) high prices can create strong incentives for 56 57 non-compliance (Challender et al., 2015a; Lo, 2020). Much of this trade involves 58 poorly reported catches from Eastern and Western Pacific countries, which supply, for 59 instance, global elasmobranch fin markets (Cardeñosa et al., 2020; Houtan et al., 60 2020). Understanding and regulating such trade is challenging because elasmobranch 61 products are extremely diverse in both their usage and their value and are processed in a myriad of different ways (Figure 1) (Dent et al., 2015; Safari et al., 2020; Shea et 62 63 al., 2017).

64 A few regions of the world represent remarkable hotspots for elasmobranch diversity, making them focal targets for biodiversity conservation. Indonesia, with its 65 66 many islands and diverse habitats at the interface between two ocean basins, is one such region, believed to harbour about 20% of global elasmobranch diversity (119 of 67 68 509 living sharks; 106 of 633 living rays). This diversity covers the whole spectrum of 69 functional traits, from highly migratory oceanic species, to reef-associated, and 70 sedentary bottom-dwelling coastal endemic taxa (Ali et al., 2018; Ali et al., 2014; Last 71 et al., 2016). Indonesia is also the fourth most populous country in the world, with 72 many communities traditionally associated with the sea (Foale et al., 2013). This 73 makes elasmobranch conservation and management in Indonesia problematic, due to 74 diverse and unregulated small-scale fisheries, high incidences of illegal fishing, and 75 unsystematic data collection. Moreover, (Booth et al., 2018) reported that 86% of all 76 Indonesian fisheries surveyed catch elasmobranchs incidentally or as by-catch. This 77 occurs in both commercial and artisanal fisheries using various types of fishing gear, 78 such as gillnets, longlines, seine-nets and trawlers. Most sharks caught as bycatch 79 are from tuna longlines from commercial fishing fleets. In addition, whole fishing 80 communities also exist that target elasmobranchs exclusively, and in some cases even 81 certain species in particular, using tailored gear (Booth et al., 2018; Jaiteh et al., 2016). 82 Between 2007-2017, Indonesia was the largest reported contributor to global 83 elasmobranch landings, with a mean catch of 110,737 mt per year (FAO, 2020; Okes 84 et al., 2019). The paired trends of depletion and exploitation – in such a biodiverse context - call for global attention to identify effective mechanisms to ensure 85 sustainability of elasmobranch resources. This includes improving reporting, 86 87 introducing regulations and ensuring compliance (e.g. through CITES) framework 88 (Guggisberg, 2016) and other approaches (Booth et al., 2019a), with the ultimate goal 89 of identifying a balance between preserving wildlife and sustainable resource use.

Globally, market demand of elasmobranch products is stable, especially fin products (Okes *et al.*, 2019). However, since 2015, a dramatic increase was observed in the export of meat products in Indonesia (Niedermüller *et al.*, 2021). This has been linked to emerging trammel net by-catch, as a consequence of the ban on shrimp trawling (MMAF, 2015). Much of these landings are believed to include vulnerable/endangered species, including several currently listed in the regulatory trade annexes of CITES. Since elasmobranchs are processed in many ways, this

97 poses challenges to CITES requirements (i.e. legality, sustainability, and traceability) 98 and other regulatory frameworks (Abdullah et al., 2020). The large amount of caught 99 biomass, over a vast and diverse coastline, and the limited facilities and resources for 100 inspection also add obstacles to effective monitoring of elasmobranch trade in 101 Indonesia.

102 Elasmobranch conservation remains a high priority topic in marine ecology, but 103 in many circles the focus is almost entirely on the goal of species conservation, with 104 little emphasis on socio-economic aspects and limited evaluation of the trade-offs 105 among the different stakeholders (Booth et al., 2019b; Iwane et al., 2021; 106 MacKeracher et al., 2021). This study aims to reconstruct the current state of 107 elasmobranch trade in Indonesia in order to lay the foundations for a remodelled 108 management framework in light of socio-economic considerations for the world's most 109 vulnerable marine vertebrate resources. To do so, we: i) collate and summarise data 110 on landing trends, ii) investigate domestic trade flows, iii) examine import/export 111 discrepancies, iv) identify factors, challenges and solutions to maximise ecological and 112 socio-economic benefits.

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Material and methods 2.

115 National elasmobranch production statistics were compiled from 1950 to 2017, 116 taking into consideration that fisheries data collection started improving gradually from 117 2005. In 2017, there was a significant change in national data collection operations, 118 which included marine and fisheries sectors, which introduced the so-called "one-data" 119 policy. This policy is designed to provide a regulatory framework and standard 120 mechanisms to the principles of data interoperability among stakeholders (Maail, 121 2018; MMAF, 2017, 2020). Currently, there is an improvement in data resolution 122 through the addition of species-specific categories. This has been undertaken as a 123 consequence of the binding resolutions of CITES and RFMOs (which require better 124 data collection for species that are listed in their Appendices). This improvement in 125 data collection is also mandated as part of the Indonesian National Plan of Action on 126 Sharks and Rays, which was recently updated (2021-2025). It is important to note that, 127 although the Ministry for Marine Affairs and Fisheries (MMAF) monitoring systems 128 currently classify sawfishes as 'sharks', for the purpose of this study, we placed them 129 among the rays, in line with their systematic classification (Batoidea: 130 Rhinopristiformes) (Last et al., 2016). Those official statistics were combined with the 131 global capture production database from the UN Food & Agriculture Organisation 132 (FAO, 2020) to provide a better insight of both national and international elasmobranch 133 trade in Indonesia. We defined 'controlled species' as all sharks and rays that are listed 134 in CITES' annexes. Trade activities that fail to comply with national or international 135 laws for such 'controlled species' are deemed 'illegal trade'.

The domestic trade flow was examined by mining datasets from 46 fish quarantine offices across Indonesia, which included information about location of sources and destination, type of products, volume and estimated value (AFQQI-MMAF, 2019). The volume of domestic elasmobranch product exchange between source and destination locations was then plotted using the R package "network3D" (Allaire *et al.*, 2017). To improve clarity, domestic trade was filtered to flows larger than 10 ton.

143 The elasmobranch import/export data were derived from the FAO Fisheries 144 Statistics (FAO, 2019) and the Agency for Fish Quarantine and Quality Insurance 145 (AFQQI-MMAF, 2019) over a seven-year period (2012-2018). This analysis period 146 was selected because the FAO Fishery Commodities and Trade statistical collection 147 (FAO, 2019) included elasmobranch import and export records only starting from 148 2012. 'Export' was defined as the product figures reported by Indonesia as traded out 149 to other countries ('partners'), while 'Import' represented the amount of produce that 150 each trading partner declared as being imported from Indonesia (FAO, 2020). Data 151 were then filtered by selecting i) type of trade flow (export, import or re-export), ii) 152 source or destination country, and iii) harmonized system (HS) code (a code that 153 consists of an internationally standardized system of numbers to classify traded 154 products and commodities). Given the fluctuations in export and import value of fin 155 and meat products, we estimated trade record mismatches by averaging the values 156 between exports and imports over the whole 2012-2018. Bilateral trade flows between 157 Indonesia and importing countries were represented using Circos (Krzywinski et al., 158 2009). The Circos graph allows for the data to be visualized into a circular layout and 159 this is then used to explore the relationship between countries in this case. 160 Calculations and visualisation were performed in R 3.6.1 (R_Core_Team, 2019). 161 Discrepancy between Indonesia and bilateral trade partners were traced using the

method detailed by (Cawthorn *et al.*, 2017) by subtracting the export figure reported
by Indonesia from the corresponding volume reported by each partner country. The
results were aggregated for the study period and for examined commodities, unless
otherwise specified. Additional information about data sources can be found in
Supplementary Table S1.

168 **3. Results**

169 **3.1. Production statistics**

170 Indonesia ranks as the world's top elasmobranch landing country in terms of 171 quantity, while its imports are negligible. According to government production 172 statistics, annual elasmobranch production has rapidly increased between the 1970s 173 and 2000, becoming relatively steady over the past decade (2005-2014), oscillating 174 between approximately 90,000 to 120,000 tonnes per year, with a 10-year annual 175 average of 107,623 (SD 12,932) tonnes (FAO, 2020; MMAF, 2017, 2020). Sharks 176 generally amounted to just over half of landings, with the situation reversed in the last 177 six years, when rays peaked to account for up to two thirds of reported catches in 2016 178 (Figure 2).

179 National statistics are grouped into broad categories (the official recording of nine 180 and seven categories of sharks and rays, respectively), as collected by MMAF, e.g. 181 requiem sharks (other Carcharhinidae) and thresher sharks (Alopidae) which made up 182 most of the shark production over the past 14 years, contributing 51% and 22%, 183 respectively (Figure 3a). Shark production from 2005 to 2018 fluctuated for each 184 species group, but generally declined since 2016. Requiem (Carcharhinidae) and 185 mackerel (Lamnidae) sharks have shown stable volumes over time. CITES-listed silky 186 sharks (Carcharhinus falciformis) fall within the broader requiem shark group (other 187 carcharhinidae), while tiger shark (Galeocerdo cuvier), oceanic whitetip shark (C. 188 longimanus) and blue shark (Prionace glauca) were only recently put into separate 189 categories in 2015. Stingrays (Dasyatidae) made up most of the ray production over 190 the past ten years (56%), followed by wedgefishes (Rhinidae; 13%) and eagle rays 191 (Myliobatidae; 8%). Ray production for most species has generally increased over 192 time, although wedgefishes saw declines between 2005 and 2010 (Figure 3b). An 193 increase of other rays since 2015 were generally dominated by the families of 194 Gymuridae and Glaucostegidae.

195 Indonesia has 11 Fisheries Management Areas (FMA) that overlap with 196 provincial jurisdiction's areas (34 provinces). During the 2005-2018 period, nearly 197 1,488,006 ton sharks and rays were landed across Indonesia's 11 FMAs. FMA 711 198 (North Natuna Sea) and FMA 712 (Java Sea) were the major contributors, with 199 387,685 and 324,331 ton, respectively (Figure 4). In these two major areas, ray landings were substantially greater than shark catches. In those FMAs, tuna longliners, gillnetters and trawlers were the dominant fishing gears (MMAF, 2020).
Meanwhile, the volume of shark landings in the eastern part of Indonesia, such as
FMA 714 (Banda Sea) and FMA 718 (Arafura Sea) were higher than rays.

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205 **3.2. Domestic trade statistics**

206 Based on national statistics, in 2018, the export of elasmobranch products was 207 only just over 11.7% (11,867 ton) of landing data (101,707 ton), and only around 4% 208 (30,560 ton) over the whole period between 2012 and 2018 (771,009 ton). As a large 209 archipelagic country, even the internal supply chain is complex and involves several 210 actors and transit locations. There are several main supplier provinces of 211 elasmobranch commodities, such as Bali, Papua, West Papua, East Kalimantan and 212 Bangka-Belitung Provinces (Figure 5a), with Bali and Papua together accounting for 213 68.2% of the outflow at 10,587 ton. The Bali province also plays a role as a transit hub 214 prior to subsequent shipping to Jakarta and East Java Provinces (Surabaya) (Figure 215 5b), which are the two main international export hubs. Moreover, these main suppliers 216 were not mirroring the two main landing places located in the North Natuna Sea and 217 the Java Sea. Additional information about domestic flow can be found in 218 Supplementary Figure S2.

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220 **3.3. International trade statistics**

221 Between 2013 and 2018, exported elasmobranch products increased steadily 222 and reached a peak of 8,320 ton in 2017 (Figure 6a). Over 70% of the exported 223 products are still dominated by meat, except in 2016, where the export of fins (878 ton 224 out of 3,002) and cartilages (1,346 ton out of 3,002) was substantial (respectively 29%) 225 and 45% of the total). Indonesia also imported elasmobranch products, mainly the 226 small-sized fins that are processed into *hissit* (shredded fins; noddle-like). However, 227 the volume is negligible, amounting for just 155 ton throughout the 2012-2018 period. 228 Products from the two main export hubs (Jakarta and Surabaya) were mainly shipped to Japan, Singapore, China and Hong Kong. In recent years, export of live 229 230 elasmobranch has also increased steadily, almost doubling every year (Figure 6b) and are likely collected to supply the aquarium trade. This demand targeted the coral reef-231 232 associated species, such as black-tip reef shark (Carcharhinus melanopterus), zebra shark (*Stegostoma fasciatum*), bowmouth guitarfish (*Rhina ancylostoma*) and
whitespotted whipray (*Himantura gerrardi*). The living elasmobranchs are mainly
exported to China, Hong Kong, Malaysia and USA.

236 We extracted export-import data from FAO Trade Statistics on elasmobranch 237 products, from 2012 to 2018, treating 'fins' and 'meat' separately. We found a 238 substantial level of misreporting in the fin trade (Figure 7a). In some cases, Indonesia 239 reported less than what the importing countries declared (e.g. Hong Kong reporting 240 440.5 ton more than what was stated by Indonesia), and in other instances it was the 241 importing partner reporting less incoming trade from Indonesia (e.g. Singapore 242 declaring 521 ton less than what was recorded by Indonesia). Similarly, this 243 phenomenon was also revealed in the meat trade (Figure 7b), with the notable case 244 of Malaysia, which reports nearly 9,000 ton more incoming trade than what was shown 245 by the Indonesian export records. On average, the discrepancy of fin and meat 246 products were 54.4% (1,462 ton) and 47.1% (13,138 ton) of the export volume 247 reported by Indonesia (2,689 ton and 27,871 ton). This discrepancy was valued at 248 43.6 million US\$ for fin and 21 million US\$ for meat products. Additional information 249 about this discrepancy can be found in Supplementary Figure S3.

250

251 **4. Discussion**

This study reveals inconsistencies in fisheries and trade statistics for the nation that lands the world's largest volume of elasmobranchs. These inadequacies are reflected in three main 'gaps', namely (i) the volume gap between landing and export, (ii) the information gap between the main landing site and main supplier at the domestic level, and (iii) the volume gap between export and reported import by trade partners. These issues sit at the core of the grand challenges facing shark population management globally.

As the top shark landing country, shark and ray landings are mainly caught as bycatch, particularly from commercial fishing gear such as tuna longline and gillnet/trammel-net (Booth *et al.*, 2018). Since the reported export volume of sharks and rays is almost negligible (4%) compared to the total landing volume, difficulties remain with the partitioning of landings into domestic consumption and international components (Dent *et al.*, 2015), while the poor taxonomic granularity of catch (and 265 trade) compositions represents a big obstacle to accurately monitor population trends 266 for most species. This is especially important in highly populated, developing and 267 biodiverse regions. Indeed, elasmobranch products sustain a diverse array of markets, 268 from lucrative demands for traditional delicacies, supplies for medicines and 269 cosmetics, curios, and substantial provision of food for local communities (Dent et al., 270 2015; Thomas-Walters et al., 2020a). The diversity and vulnerability of the living 271 resources exploited, and the complex trade routes of their derivatives, calls for a step 272 change in the ways data are recorded, fisheries are managed, and commercial 273 activities regulated.

274 In several published studies, sharks and rays contributed between 5%-30% of 275 the total catch (Jatmiko et al., 2015; Novianto et al., 2014; Pane et al., 2018; Suwarso 276 et al., 2020). Despite the substantial volume of shark and ray landings in the most 277 densely populated islands (Java and Sumatra) in Indonesia, we found that Papua and 278 Bali Provinces (FMA 718 and FMA 573) were the main market sources of 279 elasmobranch products (Figure 5a). Products from those main market sources were 280 mainly transported to Jakarta and Surabaya where many exporters are located. 281 Mismatch between landing and main supplier aside, unsystematic data recording possibly confounds the picture. Anecdotal information indicates that many 282 283 elasmobranchs caught in the Arafura Sea (FMA 718) and many other eastern regions 284 are shipped to Jakarta using cargo ships and landed in the cargo port, where they are 285 recorded as a 'product' instead of catches by the Fishing Port Authority in Jakarta. It 286 was also noticed that the Aceh Province in Sumatra Island shows no domestic trade 287 record (Figure 5b), which suggests unreported exchanges among neighbouring 288 provinces or even direct international trade with bordering countries, such as Malaysia 289 and Singapore.

The investigation on the most recent six years of international trade statistics (2012 – 2018), reveals a cumulative export of 2,689 tonnes of fins and 27,871 tonnes of elasmobranch meat reported by Indonesia. Such products are mainly exported to Hong Kong, Malaysia, Singapore, China and Thailand. Hong Kong was the main market of fin products while Malaysia was the main destination of meat products (which mostly consisted of the fresh meat of rays). These bilateral trade depictions do not attempt to match elasmobranch commodities that were imported only to be subsequently exported (re-exports), as FAO data suggest that such re-exports arenegligible.

299 Given the major difference between the export and import value of elasmobranch 300 products, the mismatch value was estimated using the average value between export 301 and import in 2012-2018. Analysis of international trade shows significant discrepancy 302 between export and import figures for fins and meat products by 1,462 ton and 13,138 303 ton respectively. This mismatch amounts to 54.4% of the total 2,689 ton export 304 declared in the fin trade, which is valued at approximately 43.6 million US\$ (based on 305 the estimated value of 29,800 US\$/ton). Gaps are mostly caused by the fin trade with 306 Singapore (under-reporting) and Hong Kong (over-reporting), by 521 and 440 ton 307 respectively. On the other hand, there was a mismatch of 47.1% of the reported export 308 in the meat trade, a value of approximately 21 million US\$ (based on the estimated 309 value of 1,600 US\$/ton), most of which is due to the underreporting of products 310 putatively imported by Malaysia (nearly 9,000 ton). This highlights substantial 311 economic loss due to the mismatch in fin and meat products. These gaps could be 312 filled, at least to some extent, by increasing granularity of elasmobranch product types 313 in the World Customs Organization (WCO) Harmonised System (HS) codes. Currently 314 elasmobranch products can be traded into 12 HS categories, which mostly emphasize 315 differences in processing, yet invariably aggregate all 'sharks', 'dogfish', and 'rays' in 316 the same group (Supplementary Table S4). This is of course insufficient to 317 accommodate the high diversity of shark and ray species that regularly feature in 318 traded products. It also reinforces concerns regarding the effectiveness of international 319 measures to combat illegal trade (Alberts, 2020; Cardeñosa et al., 2018). Similar 320 findings on trade discrepancy between Hong Kong and its partner countries 321 highlighted the importance of comprehensive data recording on elasmobranch fin 322 trade (Shea et al., 2017). It also advocates for the authorities to improve their capacity 323 to reduce the risk that illegal products might contribute to such gaps.

Anthropogenic impacts on functional diversity of marine megafauna, their ripple effect on ecosystem structure (Prasetyo *et al.*, 2019; Sherman *et al.*, 2020), and greater awareness of the value of marine predators when alive (Mustika *et al.*, 2020) has led to increased global attention to elasmobranch conservation. However, without a comprehensive understanding on the market dynamics around elasmobranch resources, including domestic and international demand, conservation success is unlikely to be attained in the medium to long term (Bennett *et al.*, 2017; Booth *et al.*,
2019b; Collins *et al.*, 2020; Glaus *et al.*, 2019). The large discrepancy between the
landing and export volumes needs to be examined in more detail in relation to the two
main factors that could potentially explain these figures: the potential role of domestic
consumption, and the potential for unreported/inaccurate trade figures.

335 CITES implementation should be periodically evaluated to examine its 336 effectiveness and shifts in behaviour. It is also crucial to investigate any alteration of 337 trade behaviour (i.e. route, volume and source) which may be counter-productive to 338 CITES principles (Booth et al., 2020; Friedman et al., 2018; Harfoot et al., 2018). 339 Without adjustments, coastal communities are unlikely to benefit from CITES 340 implementation, which may instead render their business more uncertain; so a 341 practical alternative is required for communities that depend on CITES species, 342 optimising the benefits while minimizing the costs (Lavorgna et al., 2018). Other 343 authors also have debated the effectiveness of the Convention's measures (Booth et 344 al., 2020; Challender et al., 2015a, 2015b; Cochrane, 2015; Guggisberg, 2016), but 345 the Indonesian context is unique in its complexity, whereby high species diversity, high 346 harvested biomass, complex internal trade routes, local population needs, and poor 347 reporting and the potential for illegal wildlife trade all compound to set major 348 challenges for the sustainable management of sharks and rays. Due to its failure to 349 incorporate the complex reality of socio-ecological systems, the effectiveness of the 350 CITES framework has been questioned in relation to tackling illegal wildlife trade 351 (Booth et al., 2019b; Challender et al., 2015b; Thomas-Walters et al., 2020b). For 352 instance, the CITES implementation rarely touches grassroot stakeholders (i.e. 353 fishers), who are the most impacted by the regulation and tend to leave them with 354 uncertainty and misinformation.

355 Mismatches between policy and management objectives could also detrimentally 356 impact conservation efforts. For instance, MMAF issued decree no. 2/2015 concerning 357 a trawl and seine-net ban in the Arafura Sea (FMA 718) in 2015 in order to address 358 shrimp stock depletion (Wijopriono et al., 2019). The subsequent shift from trawling 359 and seine-netting to trammel-net activity led to a significant increase of elasmobranch 360 bycatch. Within two years (2016-2018), processing plants in Jakarta have rapidly 361 expanded elasmobranch product supply. This is also mirrored in the international trade 362 statistics, where the export of elasmobranch products (especially meat) increased

363 dramatically since 2015. This "cobra effect" (Vann, 2003) whereby an attempted 364 solution to a problem (i.e. overfishing of shrimp resources) actually makes the problem 365 worse, and/or creates other unintended, problematic consequences (i.e. overfishing 366 of endangered elasmobranchs). As secondary catches, elasmobranchs have added 367 value for fisheries, while bycatch mitigation strategies remain inadequate to conserve 368 these fragile creatures (MacNeil et al., 2020). Current management should be 369 reconsidered to attain a better trade-off of conservation and management measures 370 (Peterman, 2004).

In addition, increased international trade in live elasmobranchs is likely driven by 371 372 the growing interest in displaying sharks and rays in public aquaria and theme parks 373 (Morris et al., 2018). China, Hong Kong, Malaysia and USA are the main market for 374 such commodities, which usually comprise coral reef associated species. This 375 increased demand is anticipated to add complexity and additional challenges to 376 monitoring and trade regulations. With the growing vulnerability of many elasmobranch 377 species becoming apparent, there is an urgent need for the authorities to adopt trade 378 regulations that incorporate policies to protect animal welfare in addition to conserving 379 biodiversity (Booth et al., 2019a).

380 Successful shark and ray conservation measures require sufficient data 381 collection (Dharmadi et al., 2015). Data collection in Indonesia is very challenging due 382 to it being an archipelagic country and having a shortage of taxonomic expertise on 383 elasmobranchs. For instance, there are issues with misidentification which is 384 associated with catch records, such as in the cases of 'sawfishes' (Pristidae) and 'sawsharks' (Pristiophoridae), or 'wedgefishes' (Rhinidae) and 'guitarfishes' 385 386 (Rhinobatidae). Some species of sharks have begun to be recorded separately to 387 accommodate international trade measures, i.e. CITES. Requiem sharks (other 388 Carcharhinidae) and thresher sharks (Alopidae) were the highest contributors to shark 389 catches while rays were dominated by stingrays (Dasyatidae) and wedgefishes 390 (Rhinidae). This is a major concern, as silky sharks (Carcharhinus falciformis), fall into 391 the 'other Carcharhinidae' group, and wedgefishes, have both recently been added to 392 international trade restrictions. Moreover, the two main fishing management areas 393 (FMA) that contributed the largest elasmobranch catches (Java Sea and North Natuna 394 Sea) are well-known as fishing grounds for wedgefishes and guitarfishes, and

important bases for several fishing fleets that typically fish across other FMAs, suchas FMA 713 (Makassar Strait) and FMA 718 (Arafura Sea).

397 Trade monitoring is further complicated by considering the volumes to be 398 inspected, inspection locations and type of products. There are now 48 species of 399 elasmobranchs listed in the CITES's Appendices as of 2019. Of these, 30 are 400 distributed in Indonesian and adjacent waters. Despite the valuable efforts by the 401 B/LPSPL ('Balai/Loka Pengelolaan Sumber Daya Pesisir dan Laut'; Institute for 402 Coastal and Marine Resource Management) authority of the Ministry for Marine Affairs 403 and Fisheries to meet the three main principles of CITES (i.e. legality, sustainability, 404 and traceability) across the country, limited resources still represent major challenges 405 for authorities and exporters. Species identification is also extremely challenging since 406 sharks and rays are processed in a myriad of ways, which makes the tracing of exports 407 very difficult (Abdullah et al., 2020). Emerging DNA barcoding techniques that are 408 affordable and reliable are pivotal for traceability (Cardeñosa et al., 2018). All these 409 circumstances determine the intricacies of domestic and international trade flows in 410 Indonesia (Figure 8), whose disentanglement will require multi-disciplinary 411 approaches, solid collaboration and substantial engagement.

412

413 **5. Conclusion**

414 We have made a major step towards understanding historical and current trends 415 in landing, domestic flow and international trade of sharks and rays in Indonesia. We 416 found that species catch recording, domestic traceability, and international trade are 417 all inadequate to guarantee the long-term conservation of these living resources. 418 There is also great doubt that the value chain is fair to fishers and local operators, 419 especially concerning valuable products that are exported (the main export 420 commodities of shark parts were fin, cartilage and other derivatives, while other less 421 valuable products, such as meat, are mainly for domestic consumption (Dharmadi et 422 al., 2019; Muttagin et al., 2018)). An increase of elasmobranch species listed in the 423 CITES Appendices highlights the importance of improving national capabilities to 424 monitor the supply chain, from capture to consumers/importers. The current scenario 425 calls for efforts to be made towards: i) increasing taxonomic resolution of landing and

426 trade statistics, ii) standardisation of product-based HS codes to facilitate consistent 427 naming among authorities (Cawthorn *et al.*, 2018); iii) expanding national capabilities 428 in technologies (e.g. DNA testing, (Cardeñosa *et al.*, 2018)) designed for accurate 429 product identification; iv) taking into account the socio-economic aspects of the 430 fisheries to feed into more effective conservation and management measures.

431 Community participation is a vital requirement to consider in the early stages of 432 a management plan, and it will also be helpful for the surveillance and stewardship of 433 the management action implemented in the often unique socio-ecological system in 434 question (Syakur et al., 2012). A typical example is the often touted 'shark tourism 435 solution', which only works in certain places and for certain species (Booth et al., 436 2020), and is bound to fail without effective community engagement (Mustika et al., 437 2020). As a whole, we recommend better integration of fisheries and trade 438 management, improved data collection, and increased community engagement to 439 create the required incentives and frameworks for conservation and sustainability, 440 which may work for both elasmobranchs and people.

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456

457 Author contribution

A.P., A.D.M., J.M., J.M., F.A, E.M., and S.M. conceived, designed and coordinated the
study; Data Collection and data analyses were conducted by A.P; A.P. wrote the
manuscript; all authors read and commented on the manuscript.

461

463 Additional Information

464 **Supplementary information**

465 Supplementary Table S1. Shark and ray production and trade data used in this study

466 Supplementary Figure S2. Domestic trade network of fin and meat products across467 Indonesia region within 2014-2018 (ton)

468 Supplementary Figure S3. Annual volume of reported export and import by/from 469 Indonesia in 2012-2018 for fin products (a) and meat products (b)

- 470 Supplementary Table S4: Elasmobranch product HS codes used in trade, 2008–2018
- 471 (UN Comtrade)
- 472
- 473 **Competing Interests**: The authors declare that they have no competing interests.
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475 **References**

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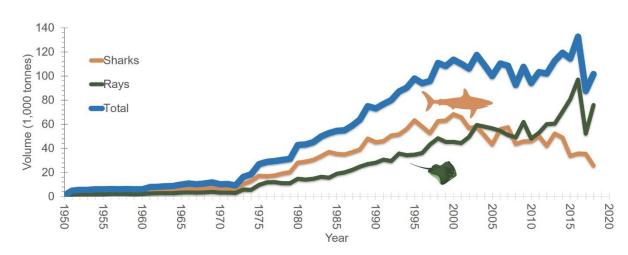
688 Figures



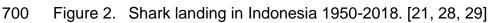
Figure 1. Storage, appearance and diversity (export commodities) of shark products: frozen shark trunks in cold storage (a), fresh rays landed in Indramayu, (c) ray cartilage, (d) stock pile of controlled species waiting for quota, (e) peeled shark fins, (f) shark oil, (g) peeled shark skin, (h) peeled ray fins, (i) "hissit" noodle-like from shark fins, and (j) shark salted meat.

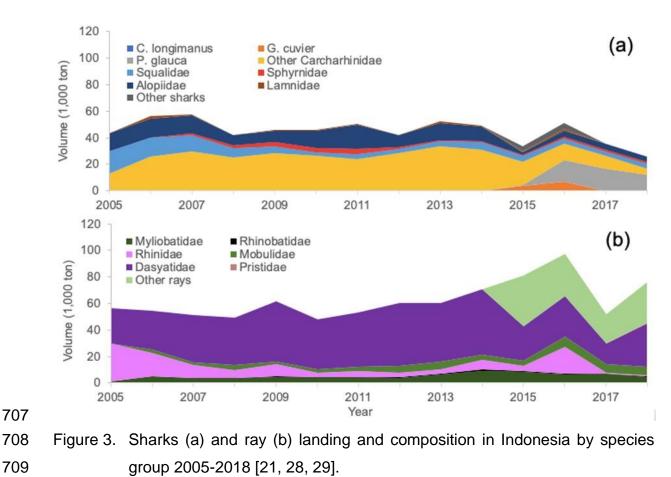
697 PLEASE SEPARATE FIGURES – ONLY ONE PER PAGE.











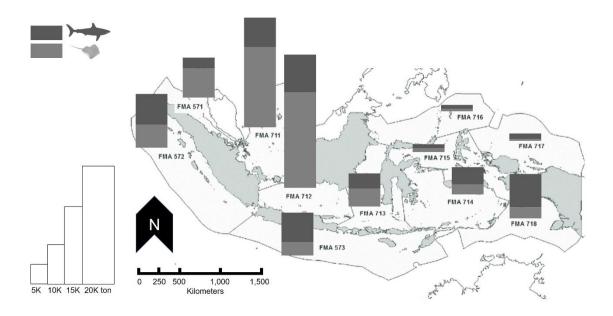


Figure 4. Cumulative volume of shark and ray landing by Fisheries Management
Area (FMA) during 2005-2018 [21, 28, 29].

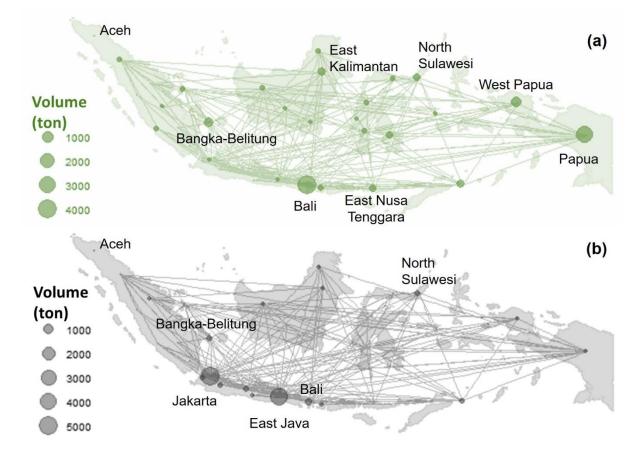


Figure 5. Domestic trade network of fin and meat products across Indonesia region
within 2014-2018 (ton) by source (a) and destination provinces (b);
provinces with label indicate significant contribution. [31]

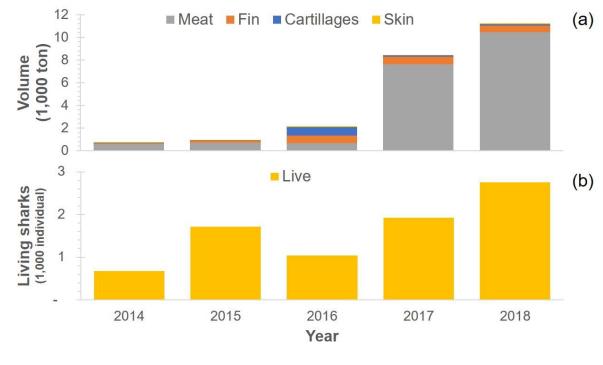
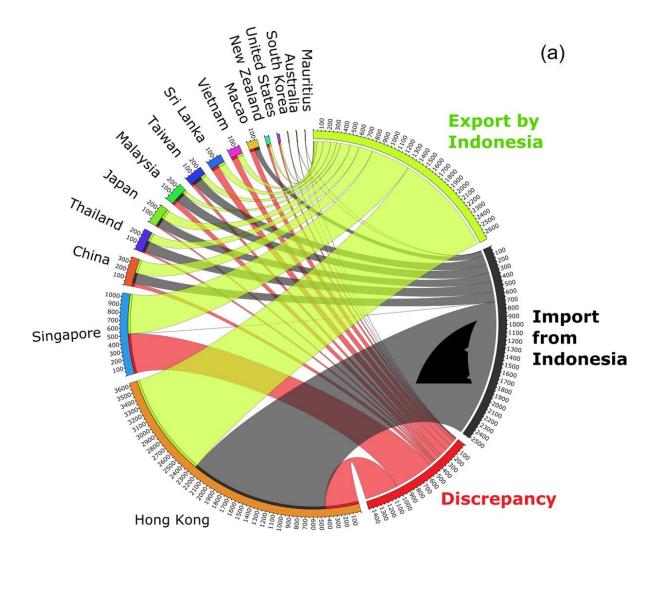
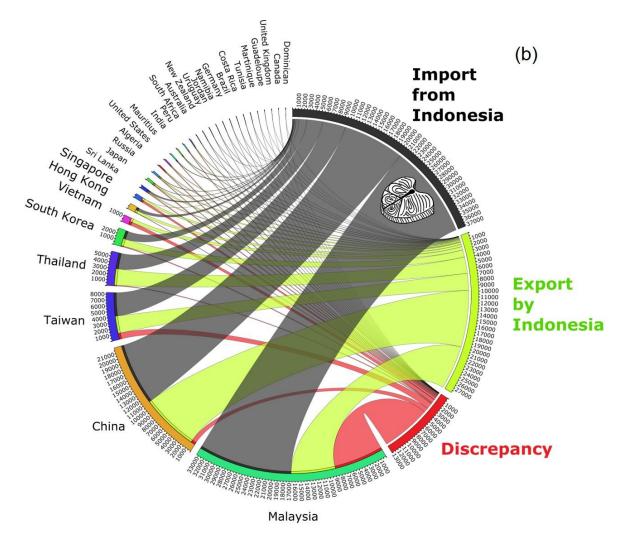
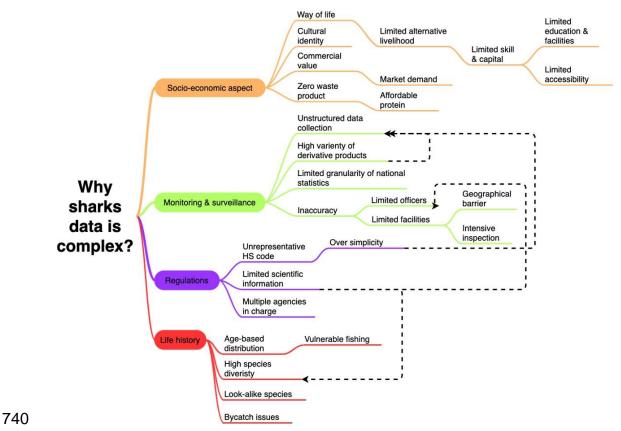


Figure 6. Export volume by products in 2014-2018 (a) and export for live sharks andrays in 2014-2018 (b). [31]





733	Figure 7.	Trade flow and discrepancy of shark fin (a) and meat (b) products between
734		Indonesia and its main trade partners, in tonnes, within the 2012-2018
735		period. Legend: Discrepancy (RED flow); the exported volume declared by
736		Indonesia (GREEN flow), and the corresponding amount declared by each
737		importing country (GREY flow). Source: [33]



741 Figure 8. Causal diagram to explain the complexity of shark trade in Indone