



United States Department of the Interior
FISH AND WILDLIFE SERVICE
International Affairs
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Falls Church, VA 22041-3803



March 12, 2026

Dear U.S. importer/exporter/re-exporter of *Galeorhinus galeus* and *Mustelus* species:

This letter is to inform you of recent actions taken by the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) regarding international trade in tope (*Galeorhinus galeus*), and smoothhounds (*Mustelus* spp.).

At the 20th meeting of the Conference of the Parties to CITES (CoP20), held November 24 to December 5, 2025, the species proposal to include the tope shark and all species in the genus *Mustelus* (smoothhounds) in CITES Appendix II was adopted with a delayed implementation date of 18 months. Upon entry into force on June 5, 2027, certain requirements for international trade in these species will be effective, as outlined below.

CITES Appendix II

Appendix II includes species that are not necessarily currently threatened with extinction but that may become so unless trade is closely controlled. International trade in specimens of Appendix-II species may be authorized by the granting of an export permit, re-export certificate, or introduction from the sea certificate. No import permit is necessary for these species under CITES (although a permit is needed in some countries that have enacted stricter domestic measures than CITES requires).

Requirements for international trade

General

On June 5, 2027, exports and re-exports from the United States of tope sharks and smoothhounds, whether alive or dead, and any parts or derivatives must be accompanied by a CITES document (a permit in case of export and a certificate in case of re-export) issued by the United States Management Authority. On June 5, 2027, imports of tope sharks and smoothhounds into the United States must be accompanied by a CITES document issued by the country of export or re-export. Even if a shipment was exported or re-exported before the effective date but will arrive in the United States or a foreign country of import, on or after the effective date, it must be accompanied by the required CITES document. Importers and exporters are urged to communicate with their foreign trade partners to ensure that shipments are in compliance with CITES requirements and are accompanied by the appropriate CITES document.

For tope sharks and smoothhounds that were taken in the marine environment not under the jurisdiction of any country, i.e. high seas, and transported into the United States on or after June 5, 2027, by a U.S. flagged vessel will need a U.S. introduction from the sea certificate.

CITES is implemented in the United States through the Endangered Species Act. *See* 16 U.S.C. §§ 1532(4), 1537a, 1538(c)(1) (making it unlawful “to engage in any trade in any specimens contrary to the provisions of [CITES], or to possess any specimens traded contrary to the provisions

of [CITES]”), 1538(g), 1539(g), 1540. U.S. CITES implementing regulations can be found at 50 CFR Part 23. The Secretary of the Interior is designated the U.S. Management Authority and U.S. Scientific Authority for CITES purposes, and the respective functions of each are carried out by the U.S. Fish and Wildlife Service (FWS). *See* 16 U.S.C. § 1537a; 50 C.F.R. § 23.6.

When applying for a CITES document or otherwise claiming the benefit of a permit or exception, it is the responsibility of the person engaging or seeking to engage in trade to provide sufficient information to demonstrate that all requirements are met. *See, e.g.*, 16 U.S.C. § 1539(g); 50 C.F.R. §§ 23.33, 23.92(b).

U.S. export permits

In order to export tope and smoothhounds from the United States, the shipment must be accompanied by a U.S. CITES export permit issued by FWS. The requirements for issuance of a U.S. CITES export certificate can be found at 50 CFR § 23.36. Before FWS issues a CITES export permit, it must determine if the animal was acquired legally, and that the proposed export would not be detrimental to the survival of the species.

If you are requesting to export tope shark and/or smoothhound specimens, including its parts or derivatives, removed from the wild from U.S. waters or previously introduced from the sea (i.e. taken from the high seas) for commercial purposes, you will need to use application form 3-200-27. When submitting the application, you will need to provide supporting documentation, including but not limited to, copies of any applicable local, Tribal, State, or Federal government authorization approving the activity (e.g., harvest or collection).

U.S. re-export certificates

For a shipment of CITES-listed wildlife to be legally re-exported from the United States, it must be accompanied by a U.S. CITES re-export certificate issued by FWS. The requirements for issuance of a U.S. CITES re-export certificate can be found at 50 CFR § 23.37. To apply for a CITES re-export certificate, you will need to use application form 3-200-73. You will be required to provide supporting documentation, as described in the application, that demonstrates the specimens were legally imported to the United States.

Foreign CITES documents for importation into the United States

Imports of tope sharks and smoothhounds into the United States must be accompanied by a CITES document issued by the country of export or re-export. We recommend importers contact the CITES Management Authority of the relevant foreign country for more information on obtaining the appropriate foreign CITES documents. Contact information can be found on the CITES website at: <https://cites.org/eng/parties/country-profiles/national-authorities>. (**Note:** some countries designate more than one Management Authority, each with specific responsibilities related to permitting, marine trade, etc.)

Introduction from the sea certificates

U.S. flagged vessels landing tope sharks and smoothhounds in the United States that originated from the marine environment not under the jurisdiction of any country (i.e. high seas), will need to apply for a U.S. introduction from the sea certificate issued by FWS. An introduction from the sea certificate is not needed for U.S. flagged vessels landing tope and smoothhounds in the United States that originated from U.S. waters (e.g. state, federal, or territorial waters). To apply for a U.S. introduction from the sea certificate, you will need to use application form 3-200-31. For more information regarding if you need an introduction from the sea certificate, visit our website: <https://www.fws.gov/sites/default/files/documents/2025-03/shark-ray-flowchart-10.16.2024-final.pdf>

Pre-Convention specimens

If the specimens being traded internationally were harvested before June 5, 2027 (the date the species was first included in the CITES Appendices), but traded after the effective date, the shipment must still be accompanied by a CITES document. A CITES pre-Convention certificate may be issued for these specimens, if all applicable requirements are met. The definition of “pre-Convention” can be found at 50 CFR § 23.5, the requirements for issuance of a U.S. pre-Convention certificate can be found at 50 CFR § 23.45, and additional guidance can be found in CITES Resolution Conf. 13.6 (Rev. CoP18) on *Implementation of Article VII, paragraph 2, concerning 'pre-Convention' specimens*, which can be found on the CITES website at www.cites.org. To apply for a pre-Convention certificate, you will need to use application form 3-200-23. You will need to provide documentation, as described in the application, to establish that the item(s) or specimen(s) you are requesting to export/re-export were removed from the wild or born in captivity prior to their listing date under the CITES.

Designated port requirements

Unless otherwise exempted, all shipments of fish and wildlife (including all CITES-listed species and their parts and products) imported, exported, or re-exported into or out of the United States must be declared and cleared by FWS Office of Law Enforcement through a designated port. Non-designated ports may be used in special circumstances as outlined in 50 CFR Part 14 Subpart C. To declare wildlife being imported or exported to FWS, you need to file a Declaration for the Importation or Exportation of Fish or Wildlife (Form 3-177). The easiest way to file a declaration for both commercial and personal shipments is via our online eDecs system at <https://edecs.fws.gov/>. Importers and exporters of wildlife shipments containing live or perishable wildlife must notify FWS Office Law Enforcement at least 48 hours prior to the estimated time of arrival. Additional information can be found on our website at: <https://www.fws.gov/program/office-of-law-enforcement/information-importers-exporters>

We look forward to working with you on implementing these new listings. If you have questions, please feel free to contact us by telephone: 703-358-2095 or email: managementauthority@fws.gov. If you have specific questions about declaration and clearance requirements or the designated wildlife ports, please contact your local Wildlife Inspection Office. Wildlife Inspection Office Contacts may be found online at: https://www.fws.gov/sites/default/files/documents/2024-06/ole-wildlife-trade-wildlife-inspection-offices-2024_0.pdf

Sincerely,

Naimah Aziz, Head
Division of Management Authority
U.S. Fish and Wildlife Service

Cc: NOAA Fisheries
Cc: CITES Secretariat
Cc: AFWA
Cc: ASMF