

The Banggai Cardinalfish and CITES

*A timeline of international efforts to regulate trade in *Pterapogon kauderni**

The Banggai cardinalfish (*Pterapogon kauderni*) is an Endangered marine ornamental fish endemic to Indonesia. Its restricted distribution, lack of a pelagic larval phase, low reproductive output and intensive collection for the aquarium trade have made it a prominent example of the conservation challenges associated with international trade in marine ornamental fishes. These concerns are documented in both the [2007 US CITES proposal](#) and the [2016 EU proposal](#).

The species has twice been proposed for inclusion in CITES Appendix II — first by the United States in 2007 and again by the European Union in 2016. Neither proposal resulted in listing. Instead, CITES followed the species through a series of species-specific Decisions between 2016 and 2022, while in 2019 it also launched a broader workstream on the trade in non-CITES-listed marine ornamental fishes.

Key point: CITES Appendix II does not ban international trade; it regulates it. Because the Banggai cardinalfish remains outside the CITES Appendices, its trade is not subject to the Convention's standard Appendix-II permitting, non-detriment-finding and annual trade-reporting requirements.

Timeline

1995 onward — International aquarium trade expands

Commercial collection for the aquarium trade began in the mid-1990s. By the time of the first CITES proposal, annual harvest and trade were estimated at approximately 700,000–900,000 fishes in the [CoP14 proposal](#).

2007 — First proposal for Appendix II

The United States submitted [CoP14 Prop. 19](#) proposing inclusion of *Pterapogon kauderni* in Appendix II, supported by additional biological and trade information in [CoP14 Inf. 37](#). The proposal argued that trade regulation was needed to prevent wild harvest from reducing populations to levels at which survival could be threatened. The proposal was ultimately withdrawn after discussion at CoP14.

2016 — Second proposal: both CITES and FAO find the criteria met

The European Union submitted [CoP17 Prop. 46](#), again proposing inclusion in Appendix II. The [CITES Secretariat's formal recommendation](#) concluded that *P. kauderni* met Criterion A of Resolution Conf. 9.24 and recommended that the proposal be adopted. This finding is particularly important because Criterion A applies where regulation of trade is necessary to avoid the species becoming eligible for inclusion in Appendix I in the near future. The Secretariat's [detailed fauna assessment](#) documented local extinctions, severe population declines and continued pressures.

The [2016 FAO Expert Advisory Panel](#) independently reached the same overall biological conclusion: it found that sequential serial depletion across a large proportion of subpopulations met the CITES Appendix-II listing criteria, and assessed the proposal as satisfying. The Panel also noted that international trade was the main driver behind fishing pressure and that an Appendix-II listing could improve traceability, monitoring and assessment of wild and captive-bred trade.

The proposal was nevertheless withdrawn. Instead, five species-specific [Decisions 17.259–17.263](#) were agreed by consensus, directing conservation, management, reporting and review work by Indonesia, the Secretariat and the Animals Committee; the withdrawal and adoption of the Decisions are recorded in the [CoP17 Committee I record](#).



2018 — Independent trade and conservation study

Under Decision 17.260, a study was commissioned to assess the impact of international trade on the conservation status of the species and advise on conservation and management measures. The study was presented as [AC30 Inf. 16](#). It confirmed that *P. kauderni* was not CITES-listed and therefore Parties were not required to report its trade in their CITES annual reports. It also showed the limitations of EU Annex D data: Member States were not required to report purpose and source codes, leaving little information on whether specimens were wild-sourced or captive-bred.

2019 — Species-specific oversight continues, and CITES turns to the wider marine ornamental fish trade

At CoP18, Parties reviewed progress on the Banggai cardinalfish and adopted [Decisions 18.263–18.265](#), encouraging Indonesia to continue conservation and management measures aimed at ensuring sustainable international trade and to report progress to the Animals Committee.

At the same meeting, Parties adopted [CoP18 Doc. 94 on conservation, management and trade in marine ornamental fishes](#) and the resulting [Decisions 18.296–18.298](#). This launched a broader CITES examination of international trade in non-CITES-listed marine ornamental fishes, including studies of biology, conservation status, trade and management, applicable trade regulations and enforcement, together with a technical workshop. The scope was subsequently defined as international trade in non-CITES-listed live coral reef fishes, including small sharks and rays.

2021 — Animals Committee review

At AC31, [Indonesia reported](#) population surveys, the establishment of a marine protected area, survey and monitoring guidance, rehabilitation guidance and a harvest quota. In the [AC31 Summary Record](#), Fondation Franz Weber, together with other conservation organisations, expressed concern about the species' conservation and survival and recommended that the Animals Committee retain it on its agenda. The Committee acknowledged Indonesia's progress and encouraged continued conservation, management and sustainable trade. The European regional representative and the United Kingdom also suggested using the Banggai cardinalfish as a case study in the Convention's broader work on marine ornamental fishes.

2022 — Species-specific CITES Decisions are closed

At CoP19, the Animals Committee reported progress made by Indonesia in [CoP19 Doc. 80](#). Committee I then agreed to delete Decisions 18.263–18.265, as recorded in [CoP19 Com. I Rec. 3 \(Rev. 1\)](#), and the outcome was confirmed in the [plenary record](#). The species itself was not added to the CITES Appendices.

2022–2024 — Indonesia's second National Action Plan

Indonesia's [second National Action Plan \(RAN\) for Banggai cardinalfish conservation](#) covered the period 2022–2024 and included objectives on data and information, protection of the species and its habitat, oversight and governance of use, and community participation and livelihoods. Its stated implementation period ended in 2024.

2025–2026 — No successor action plan identified; wild-caught export quota continues

Indonesia set export-quota documents of [38,000 wild-caught *P. kauderni* in 2025](#) and again [38,000 wild-caught individuals in 2026](#). These are export quotas, not evidence that the full quota was actually exported.



Today — Still outside the CITES Appendices

The Banggai cardinalfish remains outside the CITES Appendices. International trade can therefore continue without the standard Appendix-II controls of the Convention, although national and regional rules apply. In the European Union, the species remains in [Annex D of the EU Wildlife Trade Regulations](#), which requires import notification and monitoring. However, as documented in [AC30 Inf. 16](#), source and purpose codes are not mandatory for Annex D reporting, limiting the information available on whether traded fish are wild-sourced or captive-bred and on the purpose of trade.

What would an Appendix-II listing have changed?

An Appendix-II listing would not have prohibited trade. Under [Article IV of CITES](#), international commercial export of wild specimens would generally require a CITES export permit, a non-detriment finding by the exporting country's Scientific Authority, a finding of legal acquisition, and reporting through the Convention's annual trade-reporting system.

- a CITES export permit;
- a non-detriment finding that export would not be detrimental to the survival of the species;
- a finding that specimens were legally acquired; and
- standardised CITES trade information reported by Parties through the annual reporting system.

Because *P. kauderni* is not listed, there is no global CITES Appendix-II permit and non-detriment system governing its trade.

Why this case matters for marine ornamental fishes

The Banggai cardinalfish is unusual in the attention it has received within CITES despite never having been listed. It has been the subject of two Appendix-II proposals, a CITES Secretariat recommendation for listing, an FAO finding that the Appendix-II criteria were met, an international trade study, repeated Animals Committee review and species-specific Decisions over several Conference of the Parties cycles.

At AC31, CITES participants themselves suggested using the species as a case study in the Convention's broader work on marine ornamental fishes. Its history illustrates a central problem for this trade: even when conservation concerns are well documented, a species that remains outside the Appendices does not benefit from the Convention's standard species-specific system of permits, non-detriment findings and global trade reporting.

**TWO APPENDIX-II PROPOSALS. YEARS OF CITES CONSIDERATION.
THE SPECIES REMAINS OUTSIDE THE CITES APPENDICES.**

Source note: The wording 'not regulated under CITES' is used deliberately: Indonesian national measures and EU Annex D monitoring remain applicable. No successor to Indonesia's 2022–2024 National Action Plan for the Banggai cardinalfish could be found in publicly available sources as of August 2026. This does not exclude the possibility that a successor plan exists but has not been published or made publicly accessible.

www.procoralfish.org