

Napoleon complex

It's big, colourful and highly endangered, so of course moneyed Hong Kong diners want to feast on the humphead wrasse. An undercover investigation exposes how far local restaurants are prepared to bend the rules in order to satisfy demand.

BY **SIMON PARRY**

The dinner bill for the two guests in the one-Michelin-starred Summer Palace restaurant, at the Island Shangri-La, came to HK\$7,400, and yet the diners' verdict on the fish that was the centre-piece of their meal was well short of five stars. "It tasted a bit of gasoline," one of them remarked.

Days later, when they tucked into the same dish at the three-Michelin-starred T'ang Court, in Tsim Sha Tsui's Langham Hotel, they were presented with a bill of close to HK\$8,000. Their review, however, was even cooler. "Flat and bland," the other diner concluded. "It was nothing special."

Underwhelming as the dishes may have been, the fish served up at two of Hong Kong's leading hotel restaurants was far from ordinary. The diners – independent environmental activists who prefer to remain anonymous – were feasting on humphead wrasse, also known as Napoleon wrasse, one of the world's most endangered coral reef fish.

A gentle giant of the Indo-Pacific, the magnificent fish is among the world's biggest reef species, growing up to six feet in length and living for up to 30 years. It is a favourite of divers for its vivid colouring, natural curiosity and the distinctive hump on its head.

However, it is also a favourite among moneyed diners in Hong Kong and mainland China, who are prepared to shell out up to HK\$6,500 a kilo for live juvenile Napoleon wrasse (called *so mei* locally) drawn from a diminishing stock in Indonesia, the only legal exporter of the species. The fish is also native to the waters of the Philippines and Sabah, Malaysia.

Because the Napoleon wrasse is rare and matures slowly, the rampant trade, in mostly juvenile fish – which are either wild-caught or ranched (taken from the wild and grown in pens offshore) – is putting the species in deepening peril.

Environmentalists believe there should be a moratorium on its sale until a sustainable way can be found of supplying luxury demand without putting the fish, which is listed under the Convention on International Trade in Endangered Species (CITES) Appendix II, at further risk.

The Napoleon wrasse has, since 2004, also been listed as endangered on the International Union for Conservation of Nature's Red List of Threatened Species, while the WWF advises diners to avoid it.

The scarcity of the Napoleon wrasse, though, has only served to sharpen appetites for it among wealthy seafood lovers, according to an investigation conducted in the first quarter of this year and shared with *Post Magazine* by the two activists and the environmental organisation WildAid. The vast majority of Napoleon wrasse exported from Indonesia both legally and illegally end up in Hong Kong and a significant proportion are then smuggled on to the mainland, environmental groups say.

Of the 50 Hong Kong hotels and restaurants contacted by the activists, 31 said they could, with two or three days' notice, provide wild-caught Napoleon wrasse, which, while legal in Hong Kong, are restricted. (Financial constraints prevented the activists from putting all 31 to the test.) Exports from Indonesia of wild-caught Napoleon wrasse are capped at 2,000 a year, and Agriculture, Fisheries and Conservation Department (AFCD) rules stipulate that any Hong Kong restaurant serving such specimens must have a possession licence on display. The cap for cheaper, ranched fish is substantially higher, at 40,000, but, says University of Hong Kong marine biologist Yvonne Sadovy, "there is no biological sustainability plan for this [...] and it is being questioned at the next CITES meeting".

Every restaurant that offered Napoleon wrasse said the fish were wild-caught, according to the activists, but no possession licences were to be seen in either the Summer Place or T'ang Court when the meals were served.

Text: Red Door News





The Napoleon wrasse served to undercover activists at the Island Shangri-La's Summer Palace restaurant (left) and at T'ang Court, in The Langham (below). Pictures: WildAid/Red Door News

At T'ang Court, the two diners were ushered into a private dining room despite not having requested one, and at the Summer Palace the dish arrived "95 per cent concealed in an excessive and abnormally thick layer of scallions [spring onions]", the activists say, "likely so that other guests would not be able to identify the fish making its way from kitchen to table."

The same sensitivity surfaced in calls made to seafood restaurants outside hotels. The manager of one Sai Kung restaurant told the activists: "We have the biggest selection of seafood and the biggest fish tank in the district. Just come over and have a look. If you want a nice humphead wrasse, we can do it quietly because, if the AFCD finds out, it will mean big trouble."

Wild-caught fish are so highly sought after, despite the risk, because they are "thought to be healthier and much tastier and safer", says Sadovy. And there's a cachet to eating wild fish. "It would widely be assumed and expected that expensive fish would be wild-caught and rare."

Hong Kong ships export wild-caught Napoleon wrasse out of Indonesia without CITES permits and then do not report their cargos to customs, according to a study led by Sadovy, who has tracked the plight of the species for more than a decade. In a complex piece of detective work spanning years and including vessel tracking, checks on customs and AFCD data, and eyewitness accounts from Indonesia, Sadovy and her colleagues have gathered evidence of the scale of the illegal trade.

The oversight of Hong Kong live-fish carrier vessels by government departments, including the AFCD, Customs and the Marine Department, is "weak to absent".

"Some Hong Kong vessels importing wild live reef fishes, including Napoleon, have demonstrably been involved in illegal trade in Napoleon fish into Hong Kong and out of Indonesia," Sadovy says. "About 30 [live-fish carrier] cargo vessels are registered in Hong Kong, with about 10 legally active in Indonesia."

In recent years, the AFCD has increased enforcement, Indonesia has improved control of foreign vessels and there has been a rising awareness among businesses about the sensitivity of trading in Napoleon wrasse, Sadovy acknowledges. But the failure to crack down fully on lawbreakers means not just that this particular species continues to be illegally traded but also that a hugely lucrative live-seafood trade – the retail sale of reef fish is estimated to be worth

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at least US\$1 billion a year – is vulnerable to money laundering and income-tax evasion.

"I do not have evidence of money laundering or income-tax evasion," she says, but "the fish are certainly 'laundered' – i.e. illegal fish replace legal fish in Hong Kong retail outlets – and we have evidence of this."

Laxity also diminishes the chances of a transparent and traceable trade, from reef to restaurant, developing in support of certification and sustainable sourcing, she says. Large numbers of other live fish, mainly groupers, are part of the black market, being brought out of Indonesia and re-exported from Hong Kong into mainland China.

The lack of oversight also has human health implications, as several reef fish, including the Napoleon wrasse, can be ciguatoxic, causing vomiting, diarrhoea, numbness of extremities, mouth and lips, the reversal of hot and cold sensations, and muscle and joint aches.



Sadovy recommends that live-fish carriers should be required to report their entry to and exit from Hong Kong to the Marine Department. "Currently they are exempted from doing so, which makes their movements impossible to track or trace by customs, which cannot then check if they are declaring their cargo," she says. Inspections in cooperation with mainland authorities to tackle the "rampant cross-border smuggling of live seafood" should be stepped up, she adds.

"The illegal live seafood trade is not taken as seriously as other trades where a lot of smuggling is involved, such as electronics or cigarettes," Sadovy says. "To bring the seafood trade under control needs the involvement of more investigative capacity and stronger enforcement. This trade should fall under the Organised and Serious Crimes Ordinance."

For Sadovy, one of the most disturbing elements of the restaurant investigation was the price the wrasse now has on its head. At the Summer Palace, the cost of the fish alone was HK\$250 a tael for a 16-tael (600-gram) fish – HK\$4,000 in total – while at T'ang Court, it was HK\$180 a tael for a 28-tael fish, totalling HK\$5,040.

"The highest price I have heard of previously was US\$600 a kilo in Beijing," Sadovy says, pointing out that the HK\$250-a-tael charged at the Summer Palace equated to about US\$850 a kilo. "It is like the best beluga caviar. People pay very high prices and therefore traders have a very high incentive to go and get these products, whether it is caviar or Napoleon fish. Traders can make particularly high profits [...] so it remains appealing for them to continue sourcing Napoleons even if this might mean they sometimes must do so illegally."

"It is deeply disappointing that a top-class hotel such as the Island Shangri-La has a restaurant selling endangered species, especially given the hotel's pledge to source sustainably. Its restaurants should be setting an example, not lowering its standards, raising prices and contributing to the extinction risk now faced by this species."

Alex Hafford, a Hong Kong-based wildlife campaigner for WildAid, says, "There are homeless people sleeping on the streets in Sham Shui Po, while across the harbour in the Shangri-La there are rich people dining on a HK\$4,000 endangered fish. To me, that's obnoxious."

Hafford says the Island Shangri-La's negligence is especially frustrating "after all the exemplary public efforts they have made over the years to ban shark fin

from their restaurants and adopt a strict sustainable seafood policy.

“We hope the Shangri-La Group can learn a lesson from this and better educate their frontline staff on how they should be protecting endangered species, not selling them into extinction. The Hong Kong government should initiate regular CITES inspections, as well as carrying out CITES enforcement actions on luxury hotels in the city in order to combat the illegal trade in endangered marine species that carries on daily under our noses.”

Asked about the sale of the Napoleon wrasse, a spokesperson for the Island Shangri-La told *Post Magazine* in a statement: “The fish [was] served off-menu and our internal policies and controls which prohibit the sale of this fish [were] bypassed.

“This does not represent what we stand for. We remain committed to promoting responsible sourcing and environmental practices and we are very sorry that this has happened. We have since taken immediate action to ensure that this fish will not be offered or sold at our restaurant. We will further strengthen our internal processes and will be conducting more training and awareness programmes to ensure our staff understand our policies and the importance of sustainable sourcing.

“We held a licence to sell the fish until 2017,” the spokesperson said. “Thereafter, we introduced internal policies and controls to prohibit the sale of this fish. This should not have happened and we are very sorry that our controls were bypassed.” The hotel had been “unable to determine” whether the fish served to the activists was wild-caught or ranched, the spokesperson said, and investigations are continuing to establish whether the fish has been served on other occasions.

The Langham Hotel initially declined to answer questions about the sale of the Napoleon wrasse, instead issuing a brief statement saying the hotel was “committed to support environmental and social sustainability initiatives” and adding, “Humphead wrasse served at T’ang Court are

farmed. The item is not on our menu and is only available upon request.”

When it was pointed out that there are no farmed Napoleon fish commercially available – only ranched fish – the hotel responded with a new statement: “This is an important issue and we are always mindful of our stewardship on environmental programmes at The Langham. Therefore, after a detailed internal review of our sustainability policies, T’ang Court will cease to serve humphead wrasse with immediate effect.”

Although the activists say they were told by staff the Napoleon wrasse they ordered at T’ang Court was wild-caught, The Langham says it was in fact ranched, and therefore the restaurant did not require a possession licence.

“Since these hotels have sustainability teams and statements, they should play a role in safeguarding our marine resources and ecosystems,” says Jovy Chan, a senior programme officer at WWF-Hong Kong. “We will engage with these and other hotels to ask them to take these items off their menus. A moratorium on trade and consumption [of humphead wrasse] would help.”

The Peninsula hotel introduced a ban on the sale of Napoleon fish in 2016 and told the activists when they tried to order it in March: “We don’t do humphead wrasse.” Executive chef Florian Trento says it was his decision to take the fish off the menu, even though it had been a popular dish because of its striking appearance and delicate meat.

“I noticed over a period of years they were becoming smaller and smaller, as they were being caught and sold without even reaching full maturity,” he says. “It is important that we do not lose sight of the bigger picture with our food.”

Janice Lao, director of corporate responsibility and sustainability for the Hongkong and Shanghai Hotels, which owns The Peninsula, says it is extremely difficult to legally source Napoleon wrasse because “there is no or little record in Hong Kong that this fish has landed”.

Imported Napoleon fish are often either registered with the government as a different species or not registered at all, she says.

“This is obviously illegal. Therefore, legally, we are not even supposed to have access to this fish.”

The declining Napoleon wrasse population is part of a broader crisis in live reef food fish that threatens to see some popular species disappear from dining tables within our lifetime, according to a joint report released this year by HKU, wildlife trafficking concern group ADM Capital Foundation and the WWF. The report estimates that live-fish imports are around 50 per cent under-reported and concludes that traders and carriers are exploiting a vacuum created by inadequate and outdated regulations, legal loopholes and lax law enforcement in Hong Kong.

The AFCD told *Post Magazine* there were 29 convictions from 2014 to 2018 for illegal possession of Napoleon wrasse, with a maximum penalty of HK\$35,000 imposed.

“The AFCD will continue to strictly follow the requirements of CITES in regulating the humphead wrasse trade,” the department said in a statement.

For Sadovy, the reactions of the Island Shangri-La and Langham hotels to the investigation have been encouraging but she wonders how many other Hong Kong hotels and restaurants are continuing to drive the species into murkier and more uncertain waters.

“When we see so many of these top hotels who are prepared to sell it, legally or not, it undermines all this work and the efforts of the Indonesian government and the Hong Kong government to try to rein in this trade to sustainable levels,” she says.

Wealthy diners willing to pay HK\$5,000 for a small and often bland-tasting fish also have to accept their share of responsibility, Sadovy says.

“These customers have a choice. They have lots of money. There are lots of other excellent fish that are more sustainable. Of all people, they have the luxury to be able to choose – so, for goodness’ sake, make the right choices.” ■



Picture: WildAid/Red Door News



Picture: Red Door News

Clockwise from left:
a Napoleon wrasse in a tank outside a restaurant in Sai Kung; Yvonne Sadovy (centre) at a Napoleon wrasse awareness event, in Sai Kung; Florian Trento, executive chef of The Peninsula, which took the fish off its menu in 2016.



Picture: Friends of Hoi Ha