U.S. Fish and Wildlife Service  
Division of Scientific Authority  
Convention on International Trade in Endangered Species of Wild Fauna and Flora  
Record of Advice on Export Permit Application  

Application number: 97483e  
DMA Contact: Adrienne Lohe  

**ADVICE**  
After examining the above permit application, we find that the proposed export will not be detrimental to the survival of the species.

**Background**  
The genus *Mobula* was listed in CITES Appendix II (CoP17 Prop. 44) on January 2, 2017 with an effective implementation date of April 4, 2017 (UNEP-WCMC 2018). Trade in this genus is primarily for the gill plates which are sold for use in traditional Chinese medicine but there is also some limited live trade for use in the aquarium industry. *Mobula thurstoni* are targeted commercially, especially in Peru, the Philippines, Mexico, India, Myanmar, Sri Lanka, and Indonesia, and occurs as bycatch in gillnet, purse seine, and longline fisheries throughout the Pacific, Indian, and Atlantic Oceans. The *Mobula* spp. listing was complimentary to the *Manta* spp. listing at CoP16 (2013) that put the two species of Manta rays, *Manta birostris* (the giant oceanic manta) and *Manta alfredi* (the resident reef manta), into Appendix II. Both Manta ray species, and all nine species of *Mobula*, are targeted in fisheries directed at obtaining these species’ gill plates. Until the Mobulid rays were given CITES Appendix II protection at CoP17, harvest for the international trade in their gill plates was largely unregulated. A single mature Mobula can yield up to 3.5 kilos of dried gills and this commodity retails for as much as US$557 per kilo in China (CoP17 Prop. 44).

*Mobula thurstoni* is native to tropical, subtropical, and temperate waters of the Pacific, Atlantic, and Indian Oceans and probably occurs in many other locations from which it has not yet been identified. It is primarily pelagic or epipelagic, occurring in shallow, productive, neritic waters of less than 100 m in depth, but it is also encountered in offshore pelagic waters and around seamounts in the Mid-Atlantic Ridge. The species has a patchy distribution and is generally
encountered singly, or in small groups of two to six individuals; it is not known to occur in
schools. This species is a relatively large representative of the Mobula genera, reaching a
maximum disc width of approximately 180 cm. It matures at between 5-6 years and has a
minimum life span of approximately 14 years. There is little species specific population data
available but overall the species’ populations are believed to be in decline. In the 2016 IUCN
Red List assessment, this species was evaluated as near threatened, the same assessment as the
species received in its 2006 Red List review (Walls et al. 2016).

In Florida, wild-caught marine life is regulated by the Florida Fish and Wildlife Commission,
Florida Division of Marine Fisheries Management as authorized in Chapter 68B-42 of the
Florida Administrative Code (https://www.flrules.org/gateway/ChapterHome.asp?Chapter=68B-
42). These codes outline regulations which must be followed in order to legally harvest marine
life in Florida waters. Under Florida regulations, Mobula thurstoni is included in the Florida
Marine Prohibited Species Policy (FWC Rule 68B-8.009, F.A.C) that prohibits harvest without a
special, state issued permit. These codes also indicate that those who commercially harvest
marine species in Florida waters are required to possess a Commercial Saltwater Products
License (SPL) with the Restricted Species (RS) and Marine Life Dive Permit (MLD)
endorsements. Wholesalers and retailers are required to obtain separate Saltwater Products
Licenses.

Basis for advice

1) The applicant, Dynasty [redacted], requests authorization to export one (1) live, wild-caught bentfin devil ray (Mobula thurstoni), to [redacted]. This specimen will be put on public exhibit in a public aquarium.

2) [redacted] is a Federally Licensed Wildlife Importer/Exporter and is properly licensed in Florida with a valid SPL including the RS and MLD endorsements. They also hold current Florida Saltwater Products Wholesale and Retail licenses. In addition, they maintain a current Florida Saltwater Products Vessel Decal for each of their harvesting vessels. The applicant therefore holds all permits required by the Florida Division of Marine Fisheries Management to harvest various marine life in Florida waters. The applicant has also obtained a special species-specific permit which allows them to legally harvest the Mobulid rays referenced in this permit. Previously, this office has issued this applicant several export permits for wild harvested dwarf and lined seahorses, live hammerhead sharks and for devil rays.

3) The specimens to be exported are native to the Atlantic, Gulf of Mexico and Caribbean, and in the United States are native to Florida coastal waters. The specimens will be collected from the wild, in the Tampa Bay or Panama City Beach areas, under Florida permitting and licensing authority, only after this export permit has been issued. Once collected, the specimens will be maintained at the [redacted] for up to eight weeks prior to shipment.
Based upon the information provided in this application, we find that the harvest and export of this one (1) *Mobula thurstoni* specimen will **not be detrimental** to the survival of the species.

**References**


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