

REPORT OF THE SECRETARIAT ON THE MISSION CONCERNING TOTOABA (*TOTOABA MACDONALDI*)
TO THE PEOPLE'S REPUBLIC OF CHINA

1. The Standing Committee at its 77th meeting (SC77, Geneva, November 2023), agreed Recommendation f) on Totoabas (*Totoaba macdonaldi*), requesting China and the United States of America to invite the Secretariat for a technical mission to get a better understanding of the measures and activities being implemented by these Parties in accordance with the provisions of paragraphs a) to c) of Decision 18.292 (Rev. CoP19) on Totoabas (*Totoaba macdonaldi*). China consequently issued an invitation and the mission to China was conducted from 3 to 7 June 2024.
2. The Secretariat was afforded the opportunity to meet, engage and have detailed discussions with operational and senior level representatives from the different Chinese authorities with a role in preventing, detecting, investigating and prosecuting totoaba specimen trafficking as it affects mainland China. The mission commenced in Beijing on 3 June with discussions between the Secretary-General of CITES and the Head of the National Forestry and Grassland Administration (NFGA). The NFGA oversees the conservation and management of China's grasslands, forests, wetlands and terrestrial wildlife, is responsible for combatting land degradation and desertification, oversees China's nature reserve system, and is the entity that hosts the CITES Management Authority (MA) of China. Following this meeting, the NFGA led a meeting with the presence of representatives from different Ministries that participate in its inter-ministerial coordination mechanism established to address wildlife crime, including totoaba specimen trafficking. This included representatives from the Supreme People's Court, Supreme People's Procuratorate, Ministry of Foreign Affairs, Ministry of Public Security, Ministry of Justice, Ministry of Agriculture and Rural Affairs, People's Bank of China (Financial Intelligence Unit (FIU) representative), General Administration of Customs, the State Administration for Market Regulation, China Coast Guard, State Post Bureau, Endangered Species Scientific Commission and others. The NFGA also organized a meeting with representatives from non-governmental organizations (NGOs) working in China on matters related to wildlife, including totoaba related matters.
3. The Secretariat, in consultation with the Chinese authorities, also organized and conducted extensive field visits during the mission. On 4 June field visits were conducted to the NFGA warehouse for confiscated terrestrial wildlife in Beijing to observe the measures and practices in place, as well as to Beijing Capital International Airport to observe the activities of Customs authorities. From 5 to 7 June field visits were conducted in Guangdong province of China, visiting various cities including Chaozhou, Guangzhou, Jiangmen and Shantou. These places in Guangdong province were specifically proposed by the Secretariat and agreed with Chinese authorities to be visited during the mission, because available information indicates that they are the primary places within China affected by totoaba specimen trafficking and are the places where these specimens are processed and sold. The field visits provided a valuable opportunity for the Secretariat to engage with and discuss matters related to totoaba specimen trafficking with the different local authorities, local fish bladder and fishery product associations, fish bladder shop vendors and fish product traders. During the visits to these cities, the Secretariat mission team also had the opportunity to get first hand insights regarding scale and nature of fish bladder trade in China and how it is regulated through field visits to markets, wholesale outlets and other places.
4. The Secretariat thanks the Government of the People's Republic of China, in particular the NFGA and its CITES MA, for the technical and logistical assistance provided to the Secretariat throughout the planning, coordination, and fulfilment of the mission. The Secretariat also thanks representatives from local authorities in the cities visited for offering their availability to engage in informative discussions, share information, provide support whenever needed, and for their hospitality during the mission. The Secretariat further thanks the fish bladder and fishery product associations, shop vendors, fish product traders and NGO representatives, for their participation and engagement in discussions and the information shared.
5. The mission focused on the provisions of paragraphs a) to c) of Decision 18.292 (Rev. CoP19) as required by SC77, Recommendation f). The Secretariat shares the mission findings in the paragraphs that follow.

6. Decision 18.292 (Rev. CoP19), paragraph a), encourages Parties affected by totoaba trafficking to fully implement the measures and activities outlined in the online [Meeting of Range, Transit and Consumer States of Totoaba](#) agreed outcomes document, in collaboration with relevant stakeholders. Paragraph b) of the same Decision encourages these Parties to draw upon the secure law enforcement communication channels and tools provided by INTERPOL and the World Customs Organization (WCO) to share information on seizures and arrests associated with totoaba specimen trafficking.
7. During the meeting with the Head of the NFGA on 3 June, the Secretary-General emphasized the importance of full implementation of Decision 18.292 (Rev. CoP19), including the importance of national level inter-agency cooperation to take effective law enforcement action against those involved in totoaba specimen trade in China and secure strict penalties. The Secretary-General also emphasized the importance of collaboration through the Trilateral Enforcement Contact Group (TECG) between China, Mexico and the United States of America, as well as the importance of sustained awareness-raising and demand reduction campaigns regarding totoaba. The Head of the NFGA expressed China's strong commitment to addressing this illegal trade, noting that totoaba (*Totoaba macdonaldi*) is treated as a first-class key protected species in accordance with national law, which allows for strict enforcement action and strong penalties to be imposed. It was further noted by the Head of the NFGA that work through the TECG is ongoing and highlighted that several other activities and initiatives that have been and continue to be undertaken by China.
8. During the meeting in Beijing on 3 June, with representatives from the relevant Ministries in China, the responsibilities of the primary enforcement bodies within China were presented. Regarding administrative powers and enforcement, the Ministry of Agriculture and Rural Affairs (MARA) and the State Administration for Market Regulation (SAMR) have the lead. MARA is responsible for national aquatic wildlife conservation, management and administrative enforcement, whilst the SAMR is responsible for investigating administrative cases involving the illegal sale, purchase, consumption and transportation of all wildlife. Regarding criminal enforcement, the General Administration of Customs China (GACC) is responsible for investigating cases involving the illegal import and export of wildlife, whilst the GACC Anti-Smuggling Bureau takes the lead on investigations into more serious import and export related trafficking offences detected, including wildlife trafficking. The Ministry of Public Security (MPS) is mandated to investigate any wildlife crime related offences detected at national level. The NFGA informed the mission team that its CITES MA has an overall coordination role, facilitating coordination between these authorities to ensure effective implementation and enforcement of CITES. It was further stated that under the Chinese "One Country Two Systems" policy, the Agriculture, Fisheries and Conservation Department is responsible for wildlife law enforcement in the Hong Kong Special Administrative Region (SAR) of China and the Economic and Technological Development Bureau is responsible for wildlife law enforcement in the Macao Special Administrative Region (SAR) of China.
9. Several interdepartmental coordination mechanisms are in place, which includes an Inter-Ministerial Liaison Group on Combating Illegal Trade in Wildlife bringing 27 ministries together to plan and coordinate measures and activities to address wildlife crime. It was stated during the mission that the next meeting of this group was planned to take place in September 2024. Further, an Inter-Departmental CITES Law Enforcement Coordination Group consisting of 12 departments or bureaus from nine ministries is in place at national level, with similar groups also in place in 31 provinces, autonomous regions and municipalities throughout China, to strengthen inter-departmental joint law enforcement.
10. Regarding activities specific to totoaba conducted at the national level, information was shared on a notification jointly issued by the CITES MA of China, MARA and the State Administration for Industry and Commerce (now known as SAMR), on 19 December 2016. This notification was directed to relevant authorities in Guangdong Province and advocated taking strict action against totoaba specimen trafficking, including through market inspections, training on totoaba specimen identification, publicity and awareness raising activities, as well as joint operations and investigations into any illegal activity detected. More recently, in May 2023, a Symposium on Combatting Illegal Trade in Totoaba was held for authorities in China. At this symposium, attended by relevant Chinese ministries and governmental agencies, the different Decisions on totoaba adopted by CITES Parties were reviewed and the different ministries and agencies responsible for

supporting their implementation were identified. The symposium outcomes identified several tasks to be pursued by the different ministries and agencies in accordance with their areas of responsibility. These included active participation in TEGC activities, undertaking market research, publication and education activities, organizing special enforcement operations and others. On 17 July 2023 the MARA Bureau of Fisheries issued a notification to provincial fisheries authorities and the China Aquatic Products Processing and Marketing Alliance (CAPPMA). This notification requested the CAPPMA to undertake market surveys regarding totoaba swim bladder and requested provincial fisheries authorities to undertake publicity and educational activities, initiate special operations and gather data on totoaba swim bladder seizures to crack down on the illegal totoaba swim bladder trade. On 11 April 2024, after consultation with relevant ministries, the CITES MA of China issued an Action Plan on Combatting Illegal Trade in Totoaba. The Action Plan includes 36 actions to be undertaken and was issued to 13 ministries and associations. The Secretariat notes that this action plan aligns with the measures and activities outlined in the online *Meeting of Range, Transit and Consumer States of Totoaba* agreed outcomes document and takes into consideration the provisions in Decisions 18.292 (Rev. CoP19), 19.75, paragraph c), and the TEGC terms of reference. The Secretariat was provided with English versions of notifications issued, the symposium outcomes and the action plan.

11. Authorities further indicated that in 2023, the Ministry of Culture and Tourism strengthened its guidance and supervision with a focus on preventing and addressing illegal trade in wildlife, requiring inspections in places where cultural events or tourism occur, such as commercial performances, artwork exhibitions and tourism markets. It also issued "2023 Training Points for Travel Agency Transformation and Upgrading, and Professional Ability Enhancement of Tour Guides", incorporating wildlife protection into the training points. In the same year, SAMR reviewed regulation requirements, implementing measures requiring dealers of products using raw animal materials to provide proof of the legal origin of such raw materials, as well as inspection and quarantine certificates. It also urged local market supervision departments to strengthen daily supervision and inspection, and to thoroughly investigate any irregular activities involving wild animals and plants and their products.
12. The NFGA provided information on various operations initiated at national and provincial level in China, as well as regional and international level operations that China participated in. It was indicated that operations specifically targeting totoaba specimens were organized in Guangdong province, whilst information on numerous operations conducted at national level were also provided. These included Operation Sword, Operation Cool Breeze, Operation Clear Wind, Operation Internet Shield, Operation Guard and Operation Gateway Sword, which all included totoaba as a target priority species. At regional level China participated in Operation Mekong Dragon in which a number of countries were involved. The mission team was informed that mainland China, Hong Kong SAR of China and Viet Nam, worked closely together under Operation Mekong Dragon and met the week prior to the Secretariat mission to plan the next iteration of this operation, which will include totoaba as a focus species. China also shared information on its participation in Operation Thunder, the global enforcement operation led by INTERPOL and the WCO.
13. Authorities highlighted that in the context of anti-money laundering, the China Anti-Money Laundering Monitoring and Analyses Center (CAMLMAC) signed memoranda of understanding (MOU) with FIUs in Mexico in 2006 and the United States of America in 2015. The mission team was informed that in 2020 and 2024, the People's Bank of China issued risk alerts on money laundering related to illegal wildlife trade to its branches and other financial institutions. The team was also informed that since 2019, CAMLMAC has provided four batches of financial information and intelligence related to smuggling of totoaba swim bladders to support investigations that were conducted by the GACC Anti-Smuggling Bureau.
14. A detailed overview was provided regarding the legislative framework in place in mainland China. It was again emphasized that totoaba is a key protected species and no legal trade, use or transport of totoaba specimens is allowed in China. Authorities stated that any trade in totoaba swim bladder, regardless of the quantity involved, is treated as a criminal offence in China. It was further explained that to be able to calculate adequate penalties, a fixed value was established for wildlife specimens, as well as their parts and derivatives. For an adult totoaba swim bladder obtained from the wild the established value is CNY 112,000 (approximately USD 15,000), and for a swim bladder from captive bred totoaba it is CNY 56,000 (approximately USD 7,700). In cases where it can be proven that the specimen was sold at a higher price than these values, the actual transaction price will be used. In cases where the value of the seized specimens is less than CNY20,000 (approximately USD 2,800), the specimens and any illegal gains will be confiscated,

and a fine of two to 20 times the value of the seized specimens will be imposed. If the value is between CNY 20,000 to 200,000 (approximately USD 2,800 to USD 28,000), the specimens and any illegal gains will be confiscated, and a fine of two to 20 times the value of the specimens will be imposed, as well as a sentence of less than five years imprisonment. If the value is between CNY 200,000 to 2,000,000 (approximately USD 28,000 to USD 280,500), the specimens and any illegal gains will be confiscated, and a fine of two to 20 times the value of the specimens will be imposed, as well as five to 10 years imprisonment. If the value is more than CNY 2,000,000 (approximately USD 280,500), the specimens and any illegal gains will be confiscated, and a fine of two to 20 times of the value of the specimens will be imposed, as well as more than 10 years or up to life imprisonment.

15. The mission team was informed that authorities in mainland China since 2018 made 20 seizures of totoaba specimens involving 5,387 totoaba swim bladders. Further, authorities in the Hong Kong SAR of China in the period 2020 to 2023 made six totoaba specimen seizures. It was reported that all these cases involved consignments originating from either Mexico or the United States of America. It was further noted that no totoaba specimen seizures were made in Macao SAR of China in recent years.
16. The 20 totoaba specimen cases detected and prosecuted in mainland China since 2018 involved a total of 45 offenders (five cases involving eight offenders in 2018, four cases involving 14 offenders in 2019, one case involving five offenders in 2020, three cases involving seven offenders in 2021, three cases involving three offenders in 2022, and four cases involving eight offenders in 2023). It was noted that court processes are often lengthy, but that 19 cases have been adjudicated in mainland China to date. In these cases, seven offenders were sentenced to less than 5 years imprisonment, more than 20 offenders were sentenced to 5-10 years imprisonment and more than 5 offenders were sentenced to more than ten years imprisonment.
17. Regarding the cases adjudicated in mainland China, 10 cases involving 25 offenders occurred in Guangdong, three cases involving six offenders occurred in Guangxi, two cases involving six offenders occurred in Hainan, three cases involving four offenders occurred in Shanghai and one case involving one offender occurred in Beijing. The NFGA in a presentation on the characteristics of crimes involving totoaba in China confirmed that the majority of the totoaba swim bladder smugglers detected to date were from Guangdong and Jiangmen, whilst available information suggest that the primary consumer markets are in Chaozhou, Guangdong and Shantou. No further information was provided regarding the cases detected in Hong Kong SAR of China.
18. The NFGA stated that cooperation with countries of origin and transit to combat the smuggling of wild animals, plants and their products has to date often been challenging. The view was also expressed that opportunities to conduct controlled deliveries as anticipated by activity 1.4 in the totoaba meeting outcome document are often underutilized. China expressed interest in increasing the use of controlled deliveries in the fight against totoaba trafficking, noting that source and transit countries intercepting totoaba swim bladders are invited to increasingly exchange information and intelligence with destination countries and consider mobilizing this technique where appropriate. China is willing to engage in this regard and to consider such requests.
19. It was further noted by Chinese authorities that information sharing will be done through the recently established and operationalized TEGC, and that it is expected that this would contribute to increased information flow and collaboration. The Secretariat took the opportunity to draw attention to Recommendation i) on Totoabas (*Totoaba macdonaldi*) agreed at SC77, which requests the Secretariat to work with INTERPOL and the United Nations Office on Drugs and Crime (UNODC) to convene Wildlife Inter Regional Enforcement (WIRE) and Regional Investigative and Analytical Case (RIACM) meetings on totoaba, subject to the availability of funds and resources. The Secretariat noted that these meetings would be complementary and not duplicative of the work done through the TEGC. They would provide a platform for the members of the TEGC subgroup on enforcement to meet in person, discuss collaboration, build trust and agree on joint work. The NFGA provided the Secretariat with the details of China's representatives in the subgroup, welcoming the meetings being arranged.
20. The mission team enquired about the communication of information regarding totoaba seizures and related arrests to INTERPOL as envisaged by Decision 18.292 (Rev. CoP19), paragraph b), and activity 1.5 in the totoaba meeting outcome document. From responses it seemed that the sharing of information concerning incidents involving totoaba is limited and there is room for improvement. The Secretariat also highlighted

that various documents on totoaba prepared for meetings of the Conference of the Parties and the Standing Committee make reference to [INTERPOL Notices](#) that were published on totoaba related matters. When the mission team asked authorities about these, the Secretariat was informed that those Notices have not come to the attention of relevant Ministries within China. It was also confirmed that no such Notices have been published at the request of China.

21. During the meeting with representatives from the relevant Ministries, detailed information regarding other measures and activities deployed in China were also provided. For example, a hotline for the public to report wildlife crime was established and all outbound Chinese passengers receive a SMS reminding them not to purchase or carry endangered species and their products into or out of the country. NFGA reported that China established cooperative relationships with 18 countries and 11 international organizations in pursuit of collaboration to combat wildlife crime. Additionally, the National Postal Administration mobilized activities to prevent and detect illegal consignments containing animals and plants and their products and urged postal enterprises to strictly implement three systems: real name delivery, inspection, and machine security inspection. It was also reported that the Cyberspace Administration of China in 2019 strengthened online platform management and advised website platforms to crack down on illegal online trade of wildlife.
22. Activity 1.6 in the totoaba meeting outcome document requests Parties affected by totoaba trafficking to nominate national focal points to facilitate stronger engagement and communication between authorities in different countries about totoaba trafficking related matters. China provided the details of its focal point for mainland China to the Secretariat and the list of [National focal points for totoaba specimen trafficking related matters](#) on the [Enforcement focal points](#) webpage were subsequently updated accordingly.
23. On 3 June in Beijing, the Secretariat mission team also met with representatives from NGOs working on wildlife matters in China. At this meeting NGOs shared information on numerous demand reduction and awareness raising campaigns they initiated or participated in, as further elaborated upon in paragraphs 45 to 50 in the present document, addressing the implementation of Decision 18.292 (Rev. CoP19), paragraph c). Information provided also highlighted work done with the travel industry and other entities to combat illegal wildlife trade, as well as training and tools provided to law enforcement agencies, including on totoaba identification. This includes a mobile application for wildlife identification developed specifically for use by officers in China and that includes totoaba identification materials. It was indicated that the application is used by more than 2,000 officers in China. Further, information was provided regarding activities implemented to address wildlife crime linked to the Internet, which included specific outreach to internet companies and the provision of training to these companies through the Coalition to End Wildlife Trafficking Online. It was noted that several Chinese internet companies joined the Coalition as members and that a future social behaviour campaign by NGOs in partnership with the Coalition is envisaged.
24. On 4 June during the field visit to Beijing Capital International Airport, the GACC demonstrated the various methods and resources that are used to scrutinize consignments and persons passing through airports in China. This information is confidential and sensitive and to protect the integrity of measures in China it cannot be made public. It can be mentioned that these include the use of advanced scanning technology and equipment, X-ray machines and other non-invasive advanced methods. The GACC confirmed that customs officers receive training on wildlife specimen identification, including the identification of totoaba specimens, and that they have access to identification materials. It was confirmed that when cases and modus operandi previously unknown or that might be of interest and assist the work of officers at other ports are detected, this information is shared through alert messages that are issued to all customs offices. The GACC also confirmed that it draws upon risk management and profiling practices to detect illegal consignments, which is in line with activity 1.8 in the totoaba meeting outcome document. It was noted that a dedicated risk assessment department issue risk profiles which assist officers to target high risk flights, consignments and individuals. It was also noted that information is reported and shared through WCO channels in accordance with established protocols. The GACC informed the mission team that customs authorities in China share information through WCO channels by working through a centralized office which feeds information as relevant into the WCO system. The GACC also confirmed that a trade management system is in place between mainland China and Hong Kong SAR of China. This system regulates trade in the same manner as international trade from other countries, subjecting consignments and people moving between mainland China and Hong Kong SAR of China to the same scrutiny and regulatory requirements.

25. On 5 June the Secretariat conducted field visits in Chaozhou and Shantou. Local governmental and enforcement authorities provided the Secretariat with detailed information about their work and activities. The Chaozhou Municipal Public Security Bureau, representing the local police, expressed strong recognition for the need to protect wild animals and plants and to address illegal trade, noting the importance of public awareness raising and education on these matters, as well the importance of joint action and collaboration between different authorities. It was reported that as local police the Public Security Bureau primarily works jointly with three other local municipal departments on matters related to wildlife: the Bureau of Forestry, the Bureau of Market Supervision and the Bureau of Agriculture and Rural Affairs. The Municipal Public Security Bureau reported that it inspects different venues and markets where wildlife specimens can be found through both regular and unannounced random inspections. It also conducts activities to address wildlife crime linked to the Internet, which includes monitoring the internet for any advertisements related to totoaba. The Municipal Public Security Bureau further informed that the Bureau of Forestry is primarily responsible for the inspection of markets and other places where terrestrial species are found, whilst the Bureau of Agriculture and Rural Affairs is primarily responsible for the inspection of markets and other places where aquatic species are found. It was noted that inspections by these entities should occur daily, but that the police only participate in these inspections occasionally or as needed, and that on average during the first part of 2024 the police participated in inspections two to three times per month. It was confirmed that selected local police officers participated in at least three species identification training sessions, which included training on the identification of totoaba specimens. These officers were trained as trainers, who now also provide similar training to other local police staff. The local police provided information showing that they also engage in public awareness raising activities targeting schools and community events using posters, brochures and banners. The Secretariat asked about the *Action Plan on Combatting Illegal Trade in Totoaba* issued by the CITES MA of China on 11 April 2024, and local police representatives confirmed that they are aware of this plan and that it was communicated to them by the Provincial Administration.
26. The Municipal Bureau of Agriculture and Rural Affairs elaborated on strict measures that are in place and applied in Chaozhou regarding the approval, supervision and management of activities involving trade in aquatic wildlife specimens, emphasizing that totoaba is completely forbidden. It noted that on-site inspections are conducted and that thorough reviews are also done on the documents and records of all traders. It further highlighted that different types of inspections are done, such as regular and routine inspections, random inspections and “double random” inspections during which the inspection targets are randomly selected and randomly assigned to inspectors. Attention was drawn to law enforcement operations that were conducted jointly with other departments, such as “Operation Qingfeng” and “Net Shield”. The Municipal Bureau of Agriculture and Rural Affairs also provided information on training sessions and promotional activities it organized, which includes on-site promotional activities, using media and social media platforms and hosting the *Aquatic Wildlife Protection Science Popularization Month* during which communities, schools, campuses, fishery industries, nature reserves and other places are involved. The mission team was informed that all these activities specifically include raising awareness of totoaba and the illegality of its trade, use and consumption.
27. The Chaozhou Municipal Bureau of Market Supervision also provided detailed information on its duties and activities. The Bureau oversees and regulates all business activities that involves wildlife specimens, their parts or derivatives. This includes commodity trading markets, catering establishments, other trading and consumption venues and e-commerce platforms such as, for example, aquatic seafood markets, dried seafood shops, high-end restaurants, private kitchens, luxury hotels, online dried seafood stores and platforms. The Bureau noted that since 2018 it distributed over a thousand promotional posters informing people of the illegality of totoaba specimens. They must be displayed visibly in all key locations such as farmers markets, seafood product stores, restaurants, etc. The Bureau further conducted numerous training interventions for aquatic product sales staff, dried goods stores staff, pharmacy staff and others, educating them about the prohibition on possession, selling and use of totoaba. The Bureau of Market Supervision also provided information on training sessions it organized for municipal and district agencies, during which officers from various agencies were trained on the importance of wildlife protection and specimen identification, including the identification of totoaba swim bladders. Similar to the Bureau of Agriculture and Rural Affairs, the Bureau of Market Supervision also highlighted its market inspection and supervision activities, as well as several law enforcement operations in which it participated jointly with other departments. The Bureau of Market Supervision also provided information on the activities it conducts to monitor online trade, noting that extensive monitoring is done to ensure that online trade is legal and to scrutinize online platforms regarding any illegal trade, including illegal trade of totoaba.

28. During the meetings in Chaozhou the mission team asked authorities to which extent experiences and information are shared between the cities known to be affected by illegal totoaba specimen trade. It was indicated that representatives from cities in Guangdong province do meet occasionally to discuss issues of common interest, but information provided suggested that such engagement is limited.
29. Information shared showed that the city's public security forces since 2017 handled a total of 86 cases involving wild animals and plants, which includes five criminal cases that occurred in 2024. None of these, however, were related to totoaba. It was also reported that no advertisements concerning totoaba specimens have been detected online.
30. Whilst in Chaozhou the mission team also met with local aquatic food stock market traders, a local trading company, an aquatic product farming company and specialty store representatives. Food stock market trader representatives stated that in order for them to obtain the required approvals and permits to trade, it is a requirement that they must have good knowledge about the legislation applicable to the trade they engage in. They indicated that training is provided to them at least once or twice per year, that governmental agencies provided them with posters denouncing any form of use of totoaba specimens which must be displayed in their stores, and that governmental officials regularly inspect their stores. Similarly, local trading company representatives confirmed that governmental agencies also provided them with posters for display. They mentioned that they mostly deal in less expensive swim bladders from non-protected species bred in captivity which are acquired domestically, but that swim bladders are also legally imported from abroad, including swim bladders from fish caught in the wild sometimes preferred by customers. Representatives from the aquatic product farming company noted that fish maw is used as food and health products, and that their company annually sells meat and bladders of at least 100 000 brown croaker fish (*Miichthys miiuy*) bred in aquaculture. It was also stated that in their experience demand for dried bladder is higher because it can be preserved longer. The specialty store representative also confirmed that governmental agencies provided posters denouncing any form of totoaba use that must be displayed and confirmed that officers annually inspect their premises. The representative confirmed that their main business is to sell fish maw which is sourced from local aquaculture produced fish. It was further stated that they operate in accordance with a standard list of species that can be traded.
31. From information shared it was evident that all these representatives were well informed about matters related to totoaba and the illegal nature of its specimens in China. They all however claimed that they have never observed or received any information about anyone offering to sell totoaba specimens or asking for such specimens to buy.
32. Information shared and observations made during the visit to Shantou were to a large extent similar to what was presented and observed in Chaozhou. During the meeting with local governmental and enforcement authorities the Shantou Agriculture and Rural Affairs Bureau reported that it is responsible for the issuance of licenses that authorize trade in wildlife species. They are also responsible for the standardization of practices that are allowed by these licenses, emphasizing that totoaba is completely forbidden. Further they are responsible for market inspections and have a special enforcement department with a focus on the prevention of illegal fishing and that inspect fisheries related activities. It was noted that inspections at restaurants and similar outlets in Shantou are mainly done by the Shantou Administration for Market Regulation, supported by the Agriculture and Rural Affairs Bureau. The Agriculture and Rural Affairs Bureau reported that it participated in national and provincial training activities, and that since 2017 it delivered 16 training interventions for officers from local authorities in Shantou on wildlife identification, including the identification of totoaba specimens. Information was provided on extensive awareness raising and educational work that the Bureau did, including campaigns on the protection of aquatic wildlife that targeted fishing areas, aquatic wildlife markets and children in primary and middle schools aged between six and 18 years old. These campaigns were also mobilized using online media and during fairs and festivals where promotional materials, display boards, etc. were used to reach as many people as possible. It included special campaigns on totoaba, during which markets and other outlets were visited and information, posters and pamphlets were distributed. The Agriculture and Rural Affairs Bureau also confirmed that conducting daily market inspections and strictly penalizing any irregular activities detected, working jointly with other governmental departments, as well as raising awareness and conducting educational activities, including on totoaba, remains a priority in its future work plans.

33. The Shantou Supervision and Administration Bureau for Market Regulation provided detailed information on its duties, which is similar to that of the Chaozhou Municipal Bureau of Market Supervision as outlined in paragraph 27 above. Information shared showed that large numbers of inspections have been conducted by the Administration at markets, catering establishments and other venues in Shantou. It was stated that different types of inspections are done. Some are announced before they are conducted, others are conducted as surprise visits without being announced in advance, and some inspections are done in a covert manner by non-uniformed officers. During regular inspections it checks that establishments hold valid business licenses and permits. Documents are also inspected to ensure that there is compliance with the traceability and acceptance system that has been put in place in accordance with directives issued by SAMR (as described in paragraph 11). This system is compulsory and applicable to all entities, enabling inspectors to verify that all products sold came from legal sources. The traceability and acceptance system also provides a classification system for commercial entities placing them into different categories, with each category representing a different risk level. Entities in category A for example are low risk and subjected to lower numbers of inspections and less scrutiny, whilst entities in category D are considered high risk and therefore are frequently inspected. The classification is done in accordance with a national directive on risk species that considers the type of specimens traded and the entity history; for example, if irregularities were found during previous inspections the entity will automatically move into a higher risk category. The mission team was informed that irregularities are subject to different levels of penalties. For minor irregularities a warning will be issued, but if the conduct persists it will be penalized with a fine. If it continues to persist the license of the entity will be revoked and it will not be allowed to conduct further business. However, if a serious offence is committed, such as trading in totoaba specimens, a criminal case will be opened for further investigation by the police and the entity will not be allowed to conduct further business.
34. The Shantou Administration for Market Regulation also provided information on the activities it conducts to monitor online trade, noting that monitoring is done to ensure that online trade is legal and that any illegal trade is swiftly addressed. It was reported that three cases of online wildlife trade were investigated, of which one was referred to the police for further investigation, but none of these involved totoaba. The Administration further highlighted law enforcement operations in which it participated jointly with other departments. Information provided also showed the awareness raising and educational work it undertook to draw attention to laws and regulations applicable to the use and consumption of wildlife. This included the use of posters, electronic display screens, newspapers, radio, television and social media platforms. It also included raising awareness about and encouraging use of the Shantou municipal governments hotline available to the public for reporting illegal activities involving wildlife.
35. The Shantou Public Security Bureau Forestry Division, representing the police, stated that the Bureau attaches great importance to cracking down on illegal totoaba trade and considers this a priority. The Bureau therefore initiated several joint meetings and engaged with relevant associations such as the Shantou Fish Maw and Seafood Association, to raise awareness about the illegal trade in totoaba and explore how these entities could contribute to addressing it. The Bureau informed the mission team that the police at least twice per year participates in regular inspections led by other departments. In addition, ad hoc inspections are done when information is received about any potential criminal offence. The Bureau recognized the need for further strengthening information sharing and law enforcement cooperation between different governmental departments. The Secretariat noted that it was critically important that this also be expanded to collaboration with authorities in other cities in China affected by totoaba specimen trafficking. This would help avoid that authorities in different cities operate in silos, and collectively gather and consolidate all available information and intelligence related to totoaba trafficking, in support of intelligence driven follow up investigations to address the networks and individuals involved in this illegal trade.
36. Information provided revealed that in 2023 a total of 10 cases related to illegal trade in birds were investigated by authorities in Shantou, and a further five cases involving birds were investigated in 2024. It was reported that no cases related to totoaba were detected in Shantou and that no online advertisements concerning totoaba specimens have been detected by Shantou authorities.
37. Whilst in Shantou the mission team met with the Shantou Fish Bladder and Seafood Association, as well as pharmaceutical company, food store and other representatives. The Shantou Fish Bladder and Seafood Association indicated that over the 12 years of its existence, it cooperated with the government to deliver training and that it also did publicity work to make its members aware of relevant legislation. The mission team was informed that quarterly meetings are held between relevant governmental agencies and the more

than 200 association members, during which posters and materials are distributed and awareness raising and training is done. The association further noted that none of its members have to date reported any incidents in the context of illegal totoaba specimen trade. The pharmaceutical company representative stated that fish bladder is collagen rich and therefore consumed as a health product. Like what was found in Chaozhou, information shared by representatives in Shantou demonstrated that they are well informed about matters related to totoaba, and they all also claimed that they have never observed or received any information about anyone offering to sell totoaba specimens or asking for such specimens to buy.

38. On 6 June the Secretariat conducted field visits in Jiangmen. The Jiangmen Municipal Bureau of Agriculture and Rural Affairs, like its counterparts in Chaozhou and Shantou, reported on extensive awareness raising and training it conducted. It was noted that the Bureau formulated and issued a law enforcement workplan for the protection of aquatic wildlife and provided training on this and CITES matters to local government authorities. It was further stated that several targeted law enforcement activities have been conducted, including through inspections at key local markets and catering venues. The Jiangmen Market Supervision and Administration Bureau highlighted that it is responsible for supervision over all outlets including markets, restaurants and e-commerce platforms, associated with the use and trade of wild animals, their parts and derivatives. It stated that in the period between 2017 and 2024, a total of approximately 266,300 routine market inspections, 23,000 online inspections and 7,259 law enforcement operation related inspections were done. The Market Supervision and Administration Bureau, like its counterparts in other cities, reported extensive educational and awareness raising work that it conducted, including through television, radio, newspapers and posters and noted that it distributed more than 41,000 materials to date. The director of the Jiangmen Municipal Bureau of Public Security, representing the police, highlighted that public security departments in Jiangmen City established dedicated enforcement bodies focusing on wildlife related crimes, such as for example the forest police and food crime investigation unit. It was further stated that since 2017, local public security departments organized 22 training sessions on laws applicable to wildlife as well as on the identification of wildlife specimens, including totoaba. The Municipal Bureau of Public Security stated that it organized 15 special inspections since 2017 targeting illegal trade in wildlife in the city, noted its collaboration with relevant local authorities, and highlighted campaigns it participated in to raise awareness about illegal trade, including illegal trade in totoaba specimens. All the mentioned entities also reported that to date no illegal totoaba specimens were detected in Jiangmen through these activities.
39. Up to this point of the mission none of the authorities in the Guangdong province cities visited had any success stories to share regarding detecting illegal trade in totoaba specimens and taking associated law enforcement action. Finally, the GACC Anti-Smuggling Bureau informed the mission team of a 2018 operation code named "SY608" targeting totoaba swim bladder trafficking. This operation led by Customs resulted in the arrest, prosecution and conviction of 16 criminal organization members and the seizure of approximately 2,621 totoaba swim bladders and involved cooperation between various stakeholders, including local authorities from some cities in Guangdong and Guangxi, Customs authorities in Hong Kong SAR of China and authorities in Viet Nam. The Secretariat will elaborate further on this in its final remarks and conclusions.
40. During a meeting with supermarket and hotel representatives in Jiangmen, supermarket representatives confirmed that they received information and awareness raising materials regarding totoaba which are displayed in their stores, and that their staff received training on this matter. Representatives from the two different supermarkets that were present at the meeting stated that both supermarket outlets only sell fish bladders originating from fish that were bred in aquaculture within China. The representative from one of the supermarkets indicated that its clients prefer to buy fresh fish bladders because it costs less than dried bladders. Similarly, the hotel industry representative shared information indicating that the hotel chain he represents only sells fish bladders originating from fish that were bred in aquaculture within China. It was confirmed that their facilities are inspected by local authorities at least twice per year and that staff is aware of the illegal status of totoaba specimens, through awareness raising and educational activities.
41. On 7 June the Secretariat conducted field visits in Guangzhou. Information provided by local governmental and enforcement authorities were again like what was reported by local authorities in the other cities. The local Bureau of Agriculture and Rural Affairs reported that a joint meeting system and judicial coordination mechanism have been put in place to facilitate coordination and interagency work. It was stated that all entities applying to trade in aquatic specimens are subjected to a strict administrative approval process and that these entities are further subjected to strict supervision when applications are approved. The Bureau

noted that it distributed more than 36,000 copies of awareness raising materials and that additional activities concerning totoaba were also conducted through training interventions via radio, online and otherwise. The Bureau further provided information showing that several law enforcement operations were held in addition to over 5000 inspections conducted in more than 2000 shops, but that no totoaba specimens were found. The Guangzhou Municipal Market Regulatory Administration stated that it undertook work to strengthen the management responsibilities of relevant trade associations, by requiring these associations to do publicity activities and training amongst their members regarding totoaba trafficking and the penalties that can be imposed for engagement in such activities. Similar to market regulation authorities in other cities, the Guangzhou Municipal Market Regulatory Administration also highlighted that it is responsible for supervision over all outlets including markets, restaurants and e-commerce platforms, associated with the use and trade of wild animals, their parts and derivatives. Regarding e-commerce platforms, it was highlighted that these platforms were requested to implement the display of electronic warning messages drawing attention to illegal trade and the associated penalties that can be imposed. It was further highlighted that labelling requirements as well as a traceability and acceptance system is in place. Information provided confirmed that this system is the same as the traceability and acceptance system described in paragraph 33 of the present document. The Market Regulatory Administration also highlighted the activities it undertook jointly with other local authorities in Guangzhou, including various law enforcement operations, noting that no cases of illegal trade in totoaba specimens were detected. The Guangzhou Municipal Public Security Bureau, representing the police, highlighted that its work programme considers addressing wildlife crime, including totoaba specimen trafficking, as a priority. The Bureau highlighted the work it conducted in collaboration with other local authorities and its engagement in various awareness raising and educational activities to draw attention to relevant legislation and penalties that could be imposed. Information provided showed that the Municipal Public Security Bureau investigated 661 wildlife related criminal cases, but that none of these related to totoaba.

42. Discussions during a meeting with market and seafood company and association representatives in Guangzhou indicated that a significant market for fish bladder exists, with the representatives of one company indicating that it produces at least 100,000 tonnes of fish maw products per annum to satisfy customer demand. The maws traded are obtained through offshore fish farming, freshwater fish farming and imports. The companies and associations present at the meeting confirmed that they work with local governmental agencies to raise awareness about illegal totoaba trade. The one association with more than 500 members indicated that it arranged training for its members and business operators in both 2015 and 2019 to draw attention to the importance of endangered species protection and the need to combat and address illegal trade. Another association with more than 300 members indicated that it organized eight theme-based trainings for its members since 2017, and that it collected over 800 written commitments from traders in which they denounce illegal trade and commit not to engage in any such trade. These associations also noted that they support authorities by exercising supervision over the activities of business operators and drawing to their attention any irregularities detected. Like in other cities, all representatives claimed that they have never observed or received any information about anyone offering to sell totoaba specimens or asking for such specimens to buy.
43. Whilst in the cities mentioned, the Secretariat conducted various on-site visits at specialty and market stores that primarily sell fish maw, as well as at supermarkets that trade in aquatic products including fish maw. During some of these visits the Secretariat had the opportunity to witness firsthand how inspections and awareness raising activities are conducted. The practices and measures deployed during these visits in the different cities were consistent. Entities trading in aquatic products including fish maw appear to be subjected to strict regulation and regular as well as surprise inspections. Business licenses, permits and relevant documentation must be available on site for inspection. Further, these entities are required to display posters that denounce illegal totoaba specimen trade and use and that provide information about penalties that could be imposed for such conduct. The Secretariat mission team, during all on-site visits arranged by the NFGA in the different cities to fish bladder and other aquatic product vendors, found these posters on display in prominent places.
44. In Guangzhou the Secretariat mission team also visited the warehouse and facilities of a company that specializes in the production of health foods made from fish maw. This company produces dry fish bladder products, ready to eat meals, desserts and others at industrial scale. It was stated by the company chairman that significant work has been done on the standardization of products, sales channels, building consumer trust through traceability systems, and making sustainable sourcing of raw materials an integral part of their

business. Information shared indicated that the company operates under [Intertek certification](#) and in accordance with recognized standards addressing food safety and quality management and is certified as [Food Safety System Certification \(FSSC 22000\)](#) compliant. Products are individually marked with a QR code which can be scanned by consumers to access detailed information about the product, as well as its composition and origin. The chairman of the company informed the mission team that the company uses fish bladders of domestic origin, and imports from various countries including Norway, Tanzania and Viet Nam. It primarily sells its products in mainland China and Hong Kong SAR of China, but also plans to expand its market abroad. It was also stated that consumers aged between 25 and 45 are primarily targeted, noting that fish bladder is collagen rich and in demand for its health benefits and anti-aging properties. When asked what the company is doing to contribute to addressing illegal trade and the issue of totoaba specimen trafficking, the mission team was informed that the company engages in awareness raising campaigns that emphasize that legal fish bladder products have the same benefits as those traded illegally; therefore, there is no need for illegally sourced specimens, which could entail penalties for violating the law. Posters that denounce the illegal totoaba specimen trade and use and provide information about penalties that could be imposed for such conduct were also on display at the warehouse and facilities of this company.

Decision 18.292 (Rev. CoP19), paragraph c)

45. Decision 18.292 (Rev. CoP19), paragraph c), encourages Parties affected by totoaba trafficking to engage in awareness-raising activities, in collaboration with relevant stakeholders, on the illegal trade in totoaba, and its severe implications for the conservation of vaquitas (*Phocoena sinus*), including demand reduction campaigns, as well as activities to eliminate supply and demand for illegally sourced specimens of totoaba, taking into consideration the measures and activities outlined in the online *Meeting of Range Transit and Consumer States of Totoaba* agreed outcomes document under the heading *Opportunities to eliminate supply and demand for illegally sourced specimens of totoaba*.
46. During the meeting with representatives from the relevant Ministries in Beijing on 3 June, the NFGA pointed out that in China awareness raising and demand reduction activities concerning totoaba have been done since 2016, and that thousands of brochures, posters and banners, as well as short messages and short videos have been produced and made available since then. It was stated that special educational activities to address illegal trade of totoaba swim bladder, were carried out in Guangdong, Hainan, and other regions of China. Information provided also indicated that the MARA continues its activities to raise public and industry awareness regarding illegal trade in totoaba and to reduce demand. The mission team was informed that MARA, NFGA, GACC and SAMR in recent times made available 1,100 posters on "Abide by the law and refuse to buy and sell totoaba swim bladders from the Gulf of California" to local agricultural and rural departments for distribution in Guangdong Province.
47. Information shared during the mission indicated that significant work has been done in China to raise awareness about totoaba and educate traders and the public about penalties that could be imposed for illegal activities involving the species. As outlined in several preceding paragraphs of the present document, information shared with the mission team showed that local governmental departments carried out a variety of publicity and awareness raising activities. In addition, the mission team was informed that different approaches have been deployed in different cities; for example, it was stated by authorities that the cities of Huizhou, Meizhou, Shenzhen, Yunfu, Zhaoqing, Zhuhai and others adopted a combination of online and offline methods to draw attention to illegal trade of totoaba and publicize the law. It was further indicated that in the city of Shanwei publicity activities regarding illegal trade in totoaba were undertaken during the 2023 fishing festival, and in conjunction with the 2023 operation "Clean Breeze Action". Also, the city of Huizhou issued a total of 1,800 publicity materials and displayed more than 210 slogans about the protection of aquatic wildlife using a LED screen, whilst the city of Qingyuan during "Polder Day" celebrations distributed more than 1,500 publicity materials, including posters and banners. In addition to this, information was shared showing that exhibitions on CITES implementation and totoaba protection have been done at different museums in China, as also elaborated upon in paragraph 50 of the present document.
48. Information further highlighted that on 28 August 2023, the CAPPMA, the China Cuisine Association and the China Hospitality Association jointly sent a letter to their members, asking them to fully comply with all laws and regulations and refuse the sale, production and consumption of totoaba swim bladder. The Secretariat was provided with an English version of the joint letter.

49. The mission team was also informed that on 10 May 2024, the CITES MA of China, after consultation with relevant ministries, issued a Work Plan on Curbing Illegal Demand for Totoaba. This work plan issued to the MARA, SAMR, CAPPMA and the China Wildlife Conservation Association (CWCA) requests the implementation of actions outlined in the plan and in collaboration with NGO representatives. The Secretariat was also provided with an English version of this action plan.
50. As mentioned in paragraph 23 above, the Secretariat also met with representatives from NGOs working on wildlife matters in China. The discussions with NGO representatives and the information they shared pointed to the work they have done over the years on awareness raising and demand reduction activities concerning totoaba. NGO representatives highlighted numerous public awareness campaigns and demand reduction activities they initiated or participated in. This included work with major aquatic markets, tourism industries and others, as well as making available and putting up posters at marketplaces selling fish maw and the use of big data to identify key audiences to target through demand reduction work. Attention was also drawn to an exhibition held in May 2024 at the National Maritime Museum of China in Tianjin, where posters and educational materials on totoaba were displayed and that attracted approximately 170,000 visitors. It was further highlighted that in support of Decision 19.55 on *Demand reduction to combat illegal trade*, TRAFFIC will implement a pilot project on demand reduction through behaviour change focusing on totoaba through a funding agreement with the CITES Secretariat and with support from China. The project will use the CITES *Guidance on demand reduction strategies to combat illegal trade in CITES-listed species* in the implementation of its activities.

Final remarks and conclusions

51. The measures and activities implemented and being undertaken by authorities in China presented during the mission indicate support of the provisions in Decision 18.292 (Rev. CoP19), paragraphs a) to c), and the measures and activities outlined in the online *Meeting of Range, Transit and Consumer States of Totoaba agreed outcomes document*.
52. With totoaba listed as a key protected species in Chinese legislation, crimes involving totoaba specimens are required to be treated as serious and strong deterrent penalties have been imposed on criminals involved in these crimes. The Secretariat welcomes the activities presented as outlined in paragraph 10, and with interest noted the Action Plan on Combatting Illegal Trade in Totoaba issued by the CITES MA of China on 11 April 2024. The Secretariat also noted with interest the Work Plan on Curbing Illegal Demand for Totoaba issued by the CITES MA of China on 10 May 2024. The Secretariat notes that at the time of the mission it was too soon to determine progress and understand the impacts that will be achieved through these initiatives. China is therefore invited to provide an update on the activities implemented and the results achieved through these initiatives, at the 78th meeting of the Standing Committee (SC78, Geneva, February 2025).
53. The Secretariat recalls that measure 3.2.5 in the totoaba meeting outcome document states that Parties that are known or potential destination countries for totoaba swim bladders should pursue awareness raising among governmental law enforcement agencies in areas where there is known to be demand. This is to be done through training and provision of materials which would help to identify totoaba swim bladders. From findings made during the mission it was evident that authorities in the cities visited are aware of matters related to totoaba specimen trafficking and the need to address it. These authorities also received training on totoaba specimen identification and relevant materials have been provided to them. The Secretariat observed that close collaboration routinely takes place between local authorities in these cities. From information gathered, it was further evident that associations, wholesale companies, traders and others involved in trade of aquatic products, including fish maw, are aware that trade in totoaba specimens is illegal. There was evidence that they have taken part in awareness raising and educational activities regarding the applicable laws and penalties that could be imposed for such illegal activities. The authorities also provided evidence to confirm that they are subjected to strict regulation and regular inspections and have been provided with posters and materials denouncing illegal totoaba specimen trade and use, which must be displayed on their premises.
54. The Secretariat welcomes the extensive work reported upon by authorities regarding the monitoring of e-commerce and online platforms for illegal trade in wildlife specimens, including totoaba specimens, in the different cities visited. This is in line with what is anticipated by activity 1.7 in the totoaba meeting outcome

document, which encourages Parties to consider illegal trade in totoaba specimens as part of their activities to address wildlife crime linked to the internet.

55. Despite all the dedicated efforts reported on by local authorities, they reported that no cases involving illegal trade in totoaba specimens were detected through their efforts, and neither did any information regarding such illegal trade come to their attention. Similarly, representatives from associations, wholesale companies, restaurant and food establishments, traders and others all claimed that they have never observed or received any information about anyone offering to sell totoaba specimens or asking for such specimens to buy. From findings made during the mission it is evident that successes in detecting and addressing totoaba specimen trafficking in China have mostly been limited to the work and activities mobilized by the GACC and its Anti-Smuggling Bureau. The Secretariat commends the GACC, in particular the Anti-Smuggling Bureau, for the successes achieved, noting that the NGFA, MARA and SAMR have also made positive contributions to combating this illegal trade through their activities as well as publicity campaigns on this issue.
56. Continued seizures of totoaba specimen consignments proves that the illegal trade continues and from field visits and information gathered during the mission it seemed obvious that illegal trade in totoaba specimens in China takes place in clandestine markets. It is essential that strict regulation and frequent inspections of legal markets, as well as continued awareness raising, education and demand reduction activities continue; however, more needs to be done regarding clandestine markets. It seems that at present, if smugglers manage to evade detection by customs when trafficking totoaba specimens into China, there is little chance that their activities will be detected or exposed by the activities of local level authorities. China is therefore encouraged to strengthen national level police engagement, through its Ministry of Public Security, in the fight against illegal totoaba specimen trade occurring within China. This could focus on information and intelligence gathering regarding individuals within China managing and organizing this illegal trade, analyzing available data to map out their criminal networks, and targeting their activities through intelligence-driven operations and investigations. Cases detected and investigated by the GACC could be reviewed as they might provide some information that could inform the information and intelligence gathering process. Further, enquiries made by the Secretariat during the mission indicated that information is rarely shared between municipal authorities from different cities known to be affected by totoaba specimen trafficking. This could result in the loss of important information that might be useful to investigations in the different cities. Supporting better sharing and consolidation of information through national level intervention could therefore also be helpful.
57. Equally important is following the money generated by this illegal trade. The Secretariat welcomes the information provided by China on the risk alerts published by the People's Bank of China and the support provided by the CAMLMAC to investigations that were conducted by the GACC Anti-smuggling Bureau, as elaborated upon in paragraph 13. From the information provided it was not clear if any information associated with totoaba trafficking has been shared between FIUs in China, Mexico and the United States of America in accordance with the respective MOUs between them. The outcomes of the online Meeting of Range, Transit and Consumer States of Totoaba places strong emphasis on the importance of strengthening the mobilization of financial investigations and FIU engagement in the fight against totoaba trafficking. All opportunities to exchange information in accordance with the MOUs established should be pursued and utilized to the fullest extent possible to facilitate targeting those individuals at the helm of the illegal totoaba trafficking trade chain. This should also be considered in activities as outlined in paragraph 56 above.
58. Regarding international collaboration, the Secretariat notes views expressed by authorities in China as outlined in paragraph 18. Although it is too soon to determine progress and understand the impacts that will be achieved through the work of the TEGC, the Secretariat concludes that with this group operational, enforcement information and intelligence exchange as well as related joint activities on totoaba trafficking could significantly improve through the work of the smaller subgroup on enforcement. China is therefore encouraged to fully engage in the work of the TEGC. Similarly, China is encouraged to through its engagement in the TEGC promote and encourage the initiation of controlled deliveries where possible and appropriate, to combat totoaba trafficking.
59. China is further encouraged to scale up the communication of totoaba related seizures and arrests to INTERPOL as envisaged by activity 1.5 in the totoaba meeting outcome document. As outlined in paragraph 8, the NFGA through its CITES MA has an overall coordination role amongst the different authorities in China to ensure effective implementation and enforcement of CITES. This is in line with the provisions of Resolution

Conf. 18.6 on *Designation and role of Management Authorities*, which in paragraph 10 states that MAs have the main responsibility of coordinating all national governmental agencies with a role in the implementation of the Convention. There seems to be a disconnect between the INTERPOL National Central Bureau (NCB) of China and the different national agencies responsible for wildlife law enforcement, resulting in important information regarding totoaba trafficking shared through INTERPOL channels not reaching the NFGA and other relevant authorities. China is therefore encouraged to consider how this could be addressed, including through the coordination mechanisms outlined in paragraph 9.

60. The Secretariat welcomes the implementation, by both governmental authorities and NGOs, of a vast array of awareness raising and demand reduction activities concerning totoaba as presented during the mission. This aligns with and directly responds to the provisions in Decision 18.292 (Rev. CoP19), paragraph c) and should be continued. Considering the number and variety of activities being delivered and planned, the Secretariat, during the meeting with NGOs held in Beijing, emphasized the importance that those working on awareness raising and demand reduction in China coordinate among themselves and collaborate to ensure that the messaging provided through this work is complementary and consistent.
61. Findings made during the mission confirmed that a significant legal fish maw market exists in China, and in Guangdong province fish maw is commonly used as a food and health product. Maw from numerous fish species can be found in legal Chinese markets, including maws from salt- and freshwater species, whilst fish from aquaculture represents a significant source of maw found in the Chinese market. Given the scale of this market it could be helpful to conduct further research on whether demand reduction efforts in China should place more emphasis on the fact that legal fish bladder products have the same benefits as those traded illegally, to contribute to behaviour change.
62. Despite the good work done that was reported to the Secretariat, extensive activities conducted, and strict regulation applied by authorities in China, seizures of totoaba swim bladder consignments destined for China continue to occur. This indicates that the illegal trade of totoaba specimens in China persists, likely in clandestine markets. Findings made during the mission were positive, but also affirms that work remains to be done and that there is a need for continued persistent and dedicated efforts to address totoaba specimen trafficking and the associated illegal trade in China. In this regard the Secretariat notes the following:
 - a) Seizures of totoaba swim bladder consignments destined for China continue to occur and this indicates that the illegal trade of totoaba specimens in China persists, likely in clandestine markets. More needs to be done regarding the clandestine domestic markets and China is therefore encouraged to strengthen national level police engagement in the fight against illegal totoaba specimen trade occurring within China, through its Ministry of Public Security. This could focus on information and intelligence gathering regarding individuals within China managing and organizing this illegal trade, analyzing available data to map out their criminal networks, and targeting their activities through intelligence-driven operations and investigations.
 - b) Information sharing between municipal authorities in different cities known to be affected by illegal totoaba specimen trafficking is limited and this could result in the loss of important information that might support follow up and investigations elsewhere. Mechanisms to support better sharing and consolidation of information and collective intelligence gathering between these cities should be explored.
 - c) Detecting and seizing illicit financial flows generated by totoaba specimen trafficking is essential. Opportunities to increasingly mobilize financial investigations and FIU engagement in the fight against totoaba trafficking must be explored. This should focus on addressing individuals within China involved in totoaba specimen trafficking and trade, as well as exchange information in accordance with the MOUs established between the FIUs of China, Mexico and the United States of America.
 - d) International collaboration and the sharing of information and intelligence have not been sufficient, but the work of the TCGG and its subgroup on enforcement offers an opportunity to resolve this and China is encouraged to fully engage in this regard.
 - e) China is encouraged to scale up communication on totoaba related seizures and arrests to INTERPOL as envisaged by activity 1.5 in the in the totoaba meeting outcome document, and to explore how existing

coordination mechanisms within China could be used to better channel information between the INTERPOL National Central Bureau (NCB) of China and the different national agencies responsible for addressing totoaba trafficking.

- f) China is invited to provide information at SC78 on the activities implemented in accordance with the Action Plan on Combatting Illegal Trade in Totoaba issued by the CITES MA of China on 11 April 2024 and the Work Plan on Curbing Illegal Demand for Totoaba issued by the CITES MA of China on 10 May 2024, including information on associated results achieved.