

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES
OF WILD FAUNA AND FLORA



Seventy-eighth meeting of the Standing Committee
Geneva (Switzerland), 3 – 8 February 2025

REPORT PRESENTED BY CHINA AS A MEMBER OF THE TRILATERAL CONTACT GROUP
ON LAW ENFORCEMENT TO COMBAT ILLEGAL TRADE IN TOTOABA

This document has been submitted by China in relation to agenda item 33.12 on *Totoabas* (*Totoaba macdonaldi*).¹

¹ *The geographical designations employed in this document do not imply the expression of any opinion whatsoever on the part of the CITES Secretariat (or the United Nations Environment Programme) concerning the legal status of any country, territory, or area, or concerning the delimitation of its frontiers or boundaries. The responsibility for the contents of the document rests exclusively with its author.*

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**REPORT PRESENTED BY CHINA AS A MEMBER OF THE TRILATERAL CONTACT
GROUP ON LAW ENFORCEMENT TO COMBATE THE ILLGAL TRADE OF TOTOABA**

1. This document has been submitted by China as a member of the Trilateral Contact Group on Law Enforcement (hereinafter **TECG**) to Combat the Illegal Trade of Totoaba (*Totoaba macdonaldi*).

Summary

2. This document supports the implementation of Decisions 18.292 and 19.74-19.76 through trilateral efforts by China, Mexico, and the United States of America to combat the illegal trade of totoaba. China hereby informs the Parties about its ongoing and completed initiatives to enhance totoaba conservation and fight illegal trade. China calls upon other Parties to implement similar measures to protect this endangered species for the long term.

Background

3. The totoaba is the largest fish species in the Sciaenidae family, with a maximum weight exceeding 100 kilograms, a length greater than 2 meters, and a lifespan of up to 25 years¹.
4. In 1976, the totoaba was listed in CITES Appendix I. In 1996, the International Union for Conservation of Nature (IUCN) classified it as “Critically Endangered”, but in 2021, it was reclassified as “Vulnerable”².
5. Historical information about the status of the totoaba population has primarily been based on commercial fishing records². However, since Mexico closed the legal fishery in the Gulf of California in 1975, no reliable estimates of population size or trends have been available. Despite the dramatic decline in population caused by overfishing in the last century, totoaba has survived under conditions of habitat degradation, illegal fishing, and incidental capture. Their exact conservation status remains unclear, as does the impact of poor ecosystem management and overfishing on the resilience of its population³.

1 Flanagan, C.A., Hendrickson, J.R., 1976. Observations on the commercial fishery and reproductive biology of Totoaba, *Cynoscion macdonaldi*, in the northern Gulf of California. *Fish. Bull.* 74, 531-544.

2 IUCN. *Totoaba macdonaldi*. <https://www.iucnredlist.org/species/pdf/2780880>

3 Valenzuela-Quirón, F., García-de-León, F. J., de Anda-Montañez, J. A., & Balart-Páez, E. F. (2011). La Totoaba del Golfo de California ¿una especie en peligro de extinción?. *Interciencia*, 36(9), 664-671.

6. The decline in the totoaba population began with the completion of the Hoover Dam in Nevada and Arizona, USA. The decline of totoaba also coincided with the sharp increase in fishing pressure and the rise of shrimp trawling⁴.
7. In 2013, U.S. Customs accidentally intercepted the illegal import of totoaba swim bladders at the U.S.-Mexico border for the first time⁵.
8. In June 2015, as part of the outcomes of the seventh round of the U.S.-China Strategic and Economic Dialogue, both sides agreed to strengthen further cooperation to combat the illegal trade of totoaba.
9. In September 2017, during the ninth BRICS summit, China and Mexico expressed their intention to cooperate in combating the illegal trade of totoaba.

Decision adopted at CoP19

10. At its 19th meeting, the Conference of the Parties (CoP19; Panama City, Panama, 2022) adopted a series of Decisions to combat the illegal trade of totoaba⁶.

Directed to: China, Mexico, and the United States of America

19.74. China, Mexico, and the United States of America are requested to jointly submit, through the Chair of the Trilateral Enforcement Contact Group (TECG), a report to the 77th meeting of the Standing Committee on the operationalization of the TECG and the activities conducted in accordance with the TECG terms of reference, as well as associated results achieved.

Directed to: Parties

19.75. Parties are encouraged to:

- a) support efforts related to the recovery and monitoring of wild populations of totoaba and vaquita;
- b) make every effort to support Mexico in the implementation of Decision 18.293 (Rev. CoP19); and
- c) support efforts to eliminate supply of and demand for illegally sourced specimens of totoaba to address and prevent their illegal trade.

Directed to: Parties in collaboration with relevant stakeholders

18.292.(Rev. CoP 19) Parties affected by illegal fishing and trafficking of totoabas, in collaboration with relevant stakeholders, are encouraged to:

- a) fully implement the measures and activities outlined in the online *Meeting of Range, Transit and Consumer States of Totoaba* agreed outcomes document, as relevant to them, to prevent and combat this

4 Cisneros-Mata, M., Montemayor-López, G., & Román-Rodríguez, M. (1995). Life History and Conservation of Totoaba macdonaldi. *Conservation Biology*, 9(4), 806-814.

5 Cracking Down on the Swim Bladder Smugglers <https://maritime-executive.com/editorials/cracking-down-on-the-swim-bladder-smugglers>

6 Decision 19.74-19,75, 18. 292 (Rev. CoP19) <https://cites.org/eng/dec/index.php/44375>

illegal trade;

b) draw upon the secure law enforcement communication channels and tools provided by INTERPOL and the World Customs Organization to share information on seizures and arrests associated with totoaba specimen trafficking;

c) engage in awareness-raising activities 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 *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*; and

d) provide financial and in-kind support for the implementation of the study called for in Decision 18.294 (Rev. CoP19), paragraph c) ⁷to be presented before the 77th meeting of the Standing Committee.

Report of the TEGC at SC77 and Request of SC77

11. During SC77, Mexico, as the Chair of TEGC, introduced the document SC77 Doc. 33.13.1 ⁸and provided an oral update on the operationalization of TEGC. The report stated that the TEGC's ToR are included in the annex of the information document SC77 Inf. 28⁹, which was agreed upon by the three parties in September 2023. The first meeting of TEGC is scheduled to be held in the first quarter of 2024.
12. SC77 requested that China and the United States of America invite the CITES Secretariat to carry out a technical mission to better understand the measures and actions taken and implemented by these Parties in accordance with the provisions of paragraphs a) to c) of Decision 18.292 (Rev. CoP19)⁶.
13. SC77 requested that China, Mexico, and the United States of America submit a report to SC78 in accordance with Decision 19.74⁶ and determine at SC78 whether these three Parties have made sufficient progress or if further measures are required.

Progress of the TEGC after SC77

14. On March 7, 2024, China, the United States, and Mexico held the first meeting of the TEGC online. The meeting mainly reached the following consensus:

- a) Establish a subordinate enforcement task group primarily composed of law enforcement officers from each country within 45 days of the meeting;

⁷ Decision 18.294 (Rev. CoP19) <https://cites.org/eng/dec/index.php/44375>

⁸ SC77 Doc. 33.13.1 <https://cites.org/sites/default/files/documents/SC/77/agenda/E-SC77-33-13-01.pdf>

⁹ SC77 Inf. 28 <https://cites.org/sites/default/files/documents/E-SC77-Inf-28.pdf>

- b) Exchange information in real-time through designated institutional channels;
 - c) Strengthen cooperation with other international law enforcement organizations, such as INTERPOL and the World Customs Organization;
 - d) Jointly and promptly address CITES notifications;
 - e) Hold a TECG working meeting before SC78, in September or October of this year;
 - f) Prepare a joint report from the three parties to be submitted to SC78.
15. From June 3 to 7, 2024, a CITES Secretariat delegation conducted an official visit to China to assess the country's efforts in combating illegal totoaba trade. The delegation was led by Secretary General Ms. Lourdes Ivonne Higuero Flores and accompanied by Mr. Barend Christoffel Janse Van Rensburg, Director of the Enforcement Unit. The Secretariat will report on the delegation's mission at SC78. In response to the Secretariat's request, China has provided the following feedback on the draft report.
- a) China implements comprehensive regulations for fish swim bladder usage. The country follows a holistic approach to fish utilization, making use of all edible parts with minimal waste. While swim bladders from hundreds of fish species are utilized in traditional practices - primarily from common species and aquaculture sources - China maintains strict regulatory oversight, particularly for protected species, in full compliance with national and international laws.
 - b) China places high priority on fighting illegal wildlife trade. Particularly regarding totoaba swim bladders. Although this specific illegal trade emerged in China only about 10 years ago, the country has actively addressed this issue since 2015. Over eight years, China has implemented comprehensive measures including market monitoring, public education campaigns, enforcement training, and coordinated anti-trafficking operations.
 - c) China has made substantial progress in its enforcement efforts against illegal totoaba trade. Through coordinated operations, Chinese anti-smuggling police have successfully dismantled identified smuggling networks, resulting in the investigation and prosecution of 20 totoaba trafficking cases and the arrest of 45 suspects. These decisive actions have significantly curtailed illegal trade activities and demonstrated China's commitment to wildlife protection.
 - d) Through comprehensive analysis of existing cases, Chinese authorities have mapped out clear patterns in the illegal trade chain. Investigation findings reveal three primary smuggling routes, with traffickers predominantly originating from Jiangmen. The final destinations for these illegal products are concentrated in two cities within Guangdong Province - Chaozhou and Shantou - where the majority of consumption occurs.
 - e) Chinese law enforcement continues its systematic dismantling of wildlife trafficking networks through coordinated operations. Specifically, Jiangmen Customs is leveraging intelligence gathered from previous investigations to conduct thorough follow-up investigations, working closely with regional public security bureaus and customs offices. This collaborative effort focuses on tracking down previously identified retailers and

consumers involved in the illegal trade network, with the ultimate goal of expanding enforcement reach and deterring future wildlife crimes.

f) We are implementing comprehensive demand reduction initiatives in collaboration with key international and domestic partners. Our international NGO partners include TRAFFIC (Trade Records Analysis of Flora and Fauna in Commerce), NRDC (Natural Resources Defense Council), WWF (World Wide Fund for Nature), IFAW (International Fund for Animal Welfare), and WildAid. Domestically, we work closely with organizations such as the China Wildlife Conservation Association (CWCA) and the China Aquatic Products Processing and Marketing Alliance (CAPTPA). Following CITES Demand Reduction Guidelines and under the Secretariat's guidance, we will be developing more targeted campaigns to reduce demand for illegal wildlife products.

g) China continues to strengthen international cooperation in wildlife protection through enhanced partnerships with key organizations. We are expanding collaboration with INTERPOL, the United Nations Office on Drugs and Crime (UNODC), and the World Customs Organization (WCO) to combat wildlife trafficking more effectively. Through the TECG, we have established effective mechanisms with the United States of America and Mexico, and will continue to strengthen these joint efforts, while also expanding engagement with other transit and consumer countries. This cooperation includes comprehensive intelligence sharing and detailed case information exchange to better track and prevent illegal wildlife trade.

h) China seeks fair and objective evaluation of its enforcement efforts and welcomes transparency and collaboration in combating illegal trade. We encourage the CITES Secretariat, Parties, and NGOs to submit any leads regarding potential illegal trade activities involving China. We commit to thorough and prompt investigation of all reported leads, with timely communication of findings. To maintain the integrity of enforcement efforts and ensure accurate reporting, we respectfully request that the Secretariat base its conclusions only on thoroughly verified information.

16. From November 4 to 7, 2024, during the 8th Wildlife Inter-Regional Enforcement (WIRE) meeting hosted by UNODC and the 35th Wildlife Crime Working Group (WCWG) meeting hosted by INTERPOL in Cape Town, South Africa, the CITES Secretariat organized a TECG meeting as part of WIRE. The meeting was attended by about 20 representatives from the three TECG countries, CITES, UNODC, and INTERPOL. The following main consensus was reached at the meeting:

a) The three parties will respectively submit information on all totoaba-related cases seized in their countries to INTERPOL through their National Central Bureaus (NCB) by the end of December this year, for INTERPOL to analyze and prepare a global report on illegal totoaba trade. Meanwhile, China and Mexico will investigate the case leads provided by the United States of America and report the findings back to the United States of America.

b) The three parties will gather as much detailed information as possible on the above-mentioned cases, share relevant information about key individuals, cooperate in

conducting related investigative activities, and adopt a full-chain approach to combat the illegal trade of totoaba.

c) A TECG offline meeting will be held in Mexico in March next year, with other transit and consumer countries invited to attend as appropriate. The meeting will continue to explore ways and content for further cooperation.

d) In the future, when totoaba smuggling cases are detected, information should be promptly shared with the relevant countries, and joint investigations should be conducted.

Efforts of China on Combatting Illegal Trade of Totoaba

17. Over the past decade, China has been dedicated to the conservation of totoaba and the fight against illegal trade, participating in all major international cooperation activities, including the TECG collaboration with Mexico and the United States of America.
18. Multiple agencies oversee wildlife protection and enforcement in China. The Ministry of Agriculture and Rural Affairs is responsible for the protection, management, and administrative law enforcement of aquatic wildlife nationwide. The State Administration for Market Regulation is responsible for investigating administrative cases related to the illegal sale, purchase, consumption, and transportation of wildlife. The General Administration of Customs monitors wildlife imports/export and combats wildlife smuggling, with the National Forestry and Grassland Administration coordinating CITES implementation. The Ministry of Public Security is responsible for investigating various wildlife crimes. Under the "One Country, Two Systems" framework, wildlife enforcement in Hong Kong and Macao is managed by their respective authorities - the Agriculture, Fisheries and Conservation Department and the Economic and Technological Development Bureau.
19. China has strengthened its totoaba conservation efforts through robust enforcement measures. Having designated totoaba as a Class I nationally protected wildlife species - the highest level of wildlife protection - China maintains stringent enforcement and severe penalties against smuggling and trafficking. Chinese law explicitly prohibits the consumption of all nationally protected wildlife species, including those not native to China but designated for protection under national regulations.
20. To strengthen enforcement against illegal wildlife trade, China considers both the ecological value and market value of wildlife when handling wildlife-related cases, using these as important criteria for determining the punishment. As a result, the assessed value of the cases is often much higher than the market transaction value of the animals.
21. Cases involving totoaba swim bladders valued over CNY 20,000 are classified as criminal cases and investigated by the police. When other regulatory departments, including fisheries, market regulation, or transportation authorities, discover totoaba swim bladders during their operations, they are required to transfer these cases to public security authorities for criminal investigation.
22. China continues to strengthen its institutional mechanisms for combating totoaba smuggling and trafficking by further leveraging the p inter-departmental joint meeting mechanism of 26 departments. The coordinated management between the national CITES Management

Authority (CITES MA), its 15 branch offices, and the CITES Scientific Authority (CITES SA) will be enhanced to ensure more effective enforcement and supervision.

23. Chinese Customs employs sophisticated non-invasive detection equipment to strengthen inspections of concealed endangered wildlife. Their screening arsenal includes large-scale container/vehicle inspection systems, CT scanners, and X-ray machines. Through years of enforcement, customs officials have developed proven expertise in detecting various illegal wildlife products, including totoaba swim bladders, ivory, rhino horns, pangolin scales, saiga antelope horns, and dried seahorses.
24. Chinese Customs utilizes advanced methods to combat totoaba swim bladder smuggling. For example, through comprehensive digital investigations, including online monitoring in key areas and cloud data analysis, authorities effectively identify concealed smuggling networks. Evidence gathering involves detailed statistical analysis of suspect movements, border crossing records, digital forensics, financial tracking, and expert identification of seized items. Through strategic collaboration with public security agencies and a multi-unit enforcement approach, Customs implements an end-to-end strategy targeting the entire illegal supply chain - from smuggling and transportation to sales, processing, and distribution networks.
25. China's Anti-Money Laundering Law, first established in 2006 and recently revised in November 2024, will implement new provisions starting January 1, 2025. To strengthen financial oversight of wildlife trafficking, the People's Bank of China has issued targeted risk alerts in 2020 and 2024. Demonstrating commitment to enforcement, the China Anti-Money Laundering Monitoring and Analysis Center has actively supported customs investigations by providing four sets of financial intelligence specifically related to totoaba swim bladder smuggling since 2019.
26. The State Administration for Market Regulation of China enhances e-commerce compliance through comprehensive oversight of major platforms including JD.com, Taobao Tmall, Tencent, Pinduoduo, Douyin, Kuaishou, Xiaohongshu, and Vipshop. These platforms implement robust monitoring systems that include keyword-based detection, case investigation protocols, and merchant education programs. They maintain sophisticated control mechanisms featuring one-click reporting capabilities and prompt violation reporting systems. Through dedicated monitoring campaigns, suspected violations are efficiently channeled to key platforms (Taobao Tmall, Xiaohongshu, and Pinduoduo) for thorough investigation and resolution.
27. China conducts comprehensive public awareness initiatives targeting totoaba conservation across all relevant cities. The Guangdong Province has implemented an extensive multimedia campaign, deploying thousands of educational materials including informative brochures, strategically placed posters, public banners, mobile text alerts, and engaging short-form videos. These materials serve dual purposes: educating the public about totoaba conservation while reminding aquatic product vendors and traditional Chinese medicine dealers about the legal consequences of engaging in any totoaba swim bladder-related activities, including purchase, sale, consumption, or transportation.

28. Targeted public awareness campaigns are currently underway in Guangdong and Hainan provinces to combat illegal totoaba trade. These comprehensive initiatives include strategic placement of warning posters and educational materials in high-risk areas, particularly traditional Chinese medicine markets and aquatic product markets. Through coordinated efforts with industry associations like the China Aquatic Products Processing and Marketing Alliance, these campaigns effectively raise awareness about totoaba conservation while working to eliminate market demand for swim bladders.
29. On December 19, 2016, the Ministry of Agriculture and Rural Affairs, the State Administration for Industry and Commerce, and the CITES MA of China jointly issued a notice to relevant departments in Guangdong Province, requiring them to implement a training program for frontline staff from fisheries, market regulation, and maritime police departments. The program aims to inspect stores and markets involved in the sale of seafood and traditional Chinese medicines, investigate illegal cases, and carry out educational activities to discourage the consumption of totoaba swim bladders.
30. Since the first totoaba swim bladder smuggling case was detected by Chinese customs in 2018, law enforcement efforts have yielded significant results across different jurisdictions. The mainland of China's anti-smuggling departments have intercepted 20 cases, while Hong Kong SAR of China have detected 6 cases specifically involving shipments from the United States and Mexico between 2020-2023. Macau SAR has reported no seizures during this period. Enforcement data indicates an encouraging downward trend in totoaba-related cases across China over the past five years.
31. According to records from the Supreme People's Court from 2018 to present, law enforcement efforts have resulted in 19 successful criminal prosecutions involving totoaba trafficking. During this period, there have been no recorded civil proceedings, administrative cases, or public interest litigation related to totoaba trade.
32. Since 2021, China has conducted multiple joint law enforcement operations targeting illegal totoaba trade. The National Forestry and Grassland Administration has led initiatives like the "Clear Wind Operation" and "Internet Shield Operation," designating totoaba as a priority species. Additionally, the Ministry of Agriculture and Rural Affairs has implemented its "China Fishery Operation Sword" campaign for several consecutive years, intensifying enforcement patrols in key areas and taking strong action against illegal totoaba swim bladder trade.
33. In 2023, the China Aquatic Products Processing and Marketing Alliance, the China Cuisine Association, and the China Hospitality Association jointly issued a warning initiative to their members and consumers, urging them to refuse to purchase, sell, cook/process, or consume totoaba swim bladders and related products/foods.
34. On July 11, 2023, China's CITES Management Authority launched a comprehensive Action Plan on Combating Illegal Trade in Totoaba. This plan was distributed to key government bodies including the Ministry of Foreign Affairs, Ministry of Agriculture and Rural Affairs, Ministry of Public Security, General Administration of Customs, State Administration for Market Regulation, and China's CITES Scientific Authority.

35. In August 2023, the Ministry of Agriculture and Rural Affairs issued a Notification on Further Strengthening the Protection of Totoaba to relevant provincial-level fishery departments. The notice mandates that illegal trade and transportation of totoaba swim bladders be prohibited in places such as agricultural markets, large supermarkets, seafood trading locations, as well as land and water passenger terminals, entry and exit inspection stations, fishing ports, and docks.
36. In 2024, CITES MA of China further issued the Action Plan on Combatting Illegal Trade in Totoaba to 13 ministries and 3 associations, requiring them to take a total of 36 actions to comprehensively combat the illegal trade of totoaba. The tasks cover all provisions specified in the relevant CITES decisions.
37. In 2024, the CITES MA of China issued the Work Plan on Curbing Illegal Demand for Totoaba to the Ministry of Agriculture and Rural Affairs, the State Administration for Market Regulation, the CWCA, and the CAPTPA. The plan requires these agencies to collaborate with non-governmental organizations such as TRAFFIC, IFAW, WildAid, WWF, WCS, and the NRDC to jointly implement a total of 12 actions.
38. In 2024, the Ministry of Public Security of China launched "Operation Kunlun 2024," a comprehensive nationwide enforcement initiative. Through this operation, public security agencies across the country were mobilized to enforce wildlife protection laws and combat crimes against endangered species, with totoaba protection being a key focus area.
39. In 2024, the Ministry of Public Security of China organized public security agencies nationwide to participate in INTERPOL's "Thunder 2024" international joint law enforcement operation, with a focus on combating cross-border illegal trade in totoaba swim bladders.
40. In 2024, the Ministry of Justice of China processed 11 criminal justice assistance requests from Mexico and 60 from South Korea, this enhanced collaboration has established a robust framework for future joint law enforcement efforts in combating the illegal trade of totoaba across borders.
41. In 2024, the China Coast Guard issued a special notification to include the illegal trade of totoaba in the "Clear Sea" operation, a special law enforcement initiative targeting maritime smuggling. The Coast Guard organized intensive maritime patrols, strengthened intelligence gathering, and resolutely fought against illegal totoaba trade activities. Through these intensified efforts and vigilant monitoring throughout the year, no totoaba smuggling incidents were detected.
42. In 2024, the General Administration of Customs of China launched special operations such as "Operation Gateway Sword 2024" and "Operation Guard 2024". These nationwide operations strengthened surveillance and enforcement against wildlife trafficking, with special emphasis on totoaba and its products. The operations implemented a strategic approach, targeting known smuggling routes, high-risk areas, and major trafficking networks. Since 2024, no totoaba smuggling cases have been detected by customs nationwide
43. In 2024, domestic NGOs such as CWCA and CAPTPA, in collaboration with international

NGOs like IFAW, NRDC, TRAFFIC, WWF, and WildAid, jointly organized a public awareness campaign to protect the totoaba at the National Ocean Museum. During the exhibition, the visitor count reached 318,000.

Further Commitment and Recommendation

44. China is committed to working with international partners, especially through the TCEG, to strengthen enforcement actions that protect the totoaba and support its population recovery.
45. China is actively compiling comprehensive data on totoaba-related cases and strengthening international cooperation through multiple channels. This includes sharing intelligence via established multilateral platforms (CITES Secretariat, WCO, INTERPOL, and UNODC) and engaging in targeted collaboration through the TCEG trilateral mechanism with Mexico and the United States. Additionally, China maintains active participation in enforcement initiatives and capacity-building activities coordinated by these international organizations to enhance global efforts against totoaba trafficking.
46. China calls on scientific authorities in range states and international organizations, particularly IUCN, to conduct comprehensive scientific studies and population assessments to better understand totoaba population trends and dynamics.
47. China urges the relevant law enforcement agencies in totoaba range countries, transit countries, and consumer countries to take comprehensive measures, as needed, to effectively curb the illegal fishing and trafficking of totoaba. In particular, China emphasizes that range countries should promote the concurrent development of totoaba protection and community livelihoods.
48. China calls on international organizations such as INTERPOL, the WCO, the CITES Secretariat, and UNODC to continue their focus on and support for totoaba conservation, particularly by providing meaningful support to range countries in balancing totoaba conservation with local community development.
49. The Standing Committee is invited to take note of this report.