

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



Seventy-fourth meeting of the Standing Committee
Lyon (France), 7 - 11 March 2022

Interpretation and implementation matters

Exemptions and special trade provisions

REGISTRATION OF THE OPERATION EARTH OCEAN FARMS.
S. DE R.L. DE C.V. (MEXICO) BREEDING *TOTOABA MACDONALDI*

This document has been submitted by Mexico in relation to agenda item 59.1.*

* *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*

Letter to Acting and Alternate Members of the CITES Standing Committee (SC74) from Earth Ocean Farms CEO

Dear Members of the CITES Standing Committee,

I write to request your attention to recent developments related to agenda item 59.1, *Registration of the operation Earth Ocean Farms. S. de R.L. de C.V. (Mexico) breeding Totoaba macdonaldi*, for the 74th meeting of the CITES Standing Committee (Lyon, France 7-11 March 2022).

On 7th January 2022, the Secretariat posted its report [SC74 Doc. 59.1.1](#), providing information of our original application of April 17th 2018 to place Earth Ocean Farms on the CITES Register of operations that breed Appendix-I animal species for commercial purposes. The material in the report's annex is the same as was discussed at the last physical meeting of the Standing Committee, [SC71 in August 2019](#). However, please refer also to the updated material, which will be posted under agenda item 59.1.2, Report of Mexico. This document contains updates and amendments to the original application of Earth Ocean Farms, with additional data required under Annex 1, Resolution Conf. 12.10 (Rev. CoP15), including current stock, percentage mortalities, etc. Most significantly, SC74 Doc. 59.1.2 section 7 amends item 11 in Earth Ocean Farm's application **to remove totoaba swim bladders from the type of product exported**. Earth Ocean Farms seeks to engage in international trade only in "*Gutted frozen whole fish (without maw or swim bladder), gutted fresh whole fish (without Swim bladder), fresh fillets, and frozen fillets*". For additional reference, I place at your disposal an explanatory [video](#) on EOF's compliance with Conf. 12.10 (Rev. CoP15). You can see every step in our operation from the hatchery to offshore farming and how we support restocking of wild totoaba populations with our relentless commitment to this endemic and thriving species.

Secondly, as Mexico states in section 11 of SC74 Doc. 59.1.2, EOF is aware of some Parties' concerns regarding potential interaction between legally produced swim bladders and those originating from illegal trafficking in wild totoaba. Therefore, should the registration be granted, EOF commits in good faith to the destruction of swim bladders, duly supervised by the authorities. We recognize the devastating impact of illegal trade upon the Appendix-I vaquita porpoise, *Phocoena sinus*, population in the Upper Gulf of California, and we will do everything in our power to prevent that legal sourced totoaba are mingled with totoaba of dubious origins. We pride ourselves on the full traceability of our products, using genetic markers, QR codes, detailed invoices, and uniform size and weight, that together provide an entirely identifiable value chain in the trade of totoaba. Nonetheless, we are always open to improvements, therefore, the destruction of the swim bladders will take place until Mexico with the endorsement of the Standing Committee and interested Parties, establish a safe procedure



for their deposit, storage, marking, and, if appropriate, possible future commercialization, under continuous supervision of the competent Authorities.

I also wish to draw a separate distinction from agenda item SC74 Doc. 28.5, where the Secretariat will post its report *Totoaba macdonaldi* SC74 Doc. 28.5, under *General Compliance and Enforcement*. This is the appropriate point during SC74's ambitious agenda to consider measures the Committee could agree to for furthering the implementation of Decisions 18.292 and 18.293.

Finally, I am proud to inform you that in [February 2021](#) Earth Ocean Farms became the world's first Best Aquaculture Practices (BAP)-certified facility for processing totoaba specimens. BAP is an international certification program based on independent audits that evaluate compliance with standards developed by the Global Aquaculture Alliance. These standards are built on a foundation of traceability and include separate evaluations of environmental responsibility, animal health and welfare, food safety, and social accountability.

I hope that this information clarifies any doubt you may have to support EOF Registration under CITES. Please, let me know if you have any question and I'll be happy to answer.

Sincerely,

Chief Executive Officer

Cc: Mexican govt agencies Economia, FGR, Hacienda, SADER, SEMAR, SEMARNAT, SRE, CITES Secretariat, INTERPOL, UNODC, World Customs Organization, CONABIO International Whaling Commission, IUCN, World Heritage Center, Cetacean Action Treasury, Environmental Defense Fund, Museo de la Ballena y Ciencias del Mar, Sea Shepherd Legal, Species Survival Network, Wildlife Conservation Society, World Wildlife Fund.