Elephant Action League protects wildlife through effective intelligence collection and investigative efforts.

Investigating the Southeast China Totoaba Maw Trade as this Traditional Product is Causing the Extinction of Both the Vaquita and the Totoaba
ABOUT EAL
Founded in 2013, Elephant Action League (EAL) is a hybrid non-profit organization that merges the worlds of high-level security, intelligence and conservation in service of wildlife and the people who protect it.

EAL is a registered nonprofit, tax-exempt charity under section 501(c)(3) of the U.S. Internal Revenue Code.

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Executive Summary

The vaquita, the world’s smallest and most endangered porpoise, is nearly extinct due to China’s demand for the swim bladders, or ‘maws,’ from a giant Mexican fish called the totoaba. By-catch from the Illegal fishing of totoabas with the use of gillnets is killing vaquitas. Traditional Chinese medicine purports swim bladder to be a curative for a variety of ailments causing demand for totoaba swim bladders (called maws) to continue. Unfortunately, less than 30 individual vaquitas remain in the Gulf of California, Mexico, the vaquita’s only natural habitat. The totoaba is also considered critically endangered, although current numbers of totoaba is not known.

In response to these dire circumstances, Elephant Action League (EAL) commenced an investigation, Operation Fake Gold, into the demand side of the illegal totoaba trade in March 2017. The investigators went undercover in China to collect the most up-to-date intelligence on the totoaba maw trade.

Part one of Operation Fake Gold targeted Chinese demand to assess the current level of trade, the attitude of the retailers who illegally sell it, and the price trend. The investigation also aimed to collect leads on how and where totoaba swim bladders (maws) are smuggled into China. The undercover investigation was focused in Guangdong Province, specifically the Shantou area and Nan’ou Island. Primary findings indicate that:

- Demand for ‘gold coin’/totoaba maws appears to be stable even through the product is illegal, with buyers primarily from Shantou and the greater Guandong Province;
- Demand for totoaba maws (and ‘gold coin’ maw in general) is driven by its use as a business gift, as well as its traditional medicinal uses for personal health and wedding dowries;
- ‘Gold coin’ fish maw pricing varies significantly based on weight, appearance, and whether it is small tube/domestic or big tube/foreign, as well as between shops;
- Big tube totoaba maws from Mexico currently average about 140,000 Yuan (RMB) per kg (over USD 20,000 per kg);
- Due to its extremely high price, current consumers of totoaba maws are relatively rich Chinese, primarily middle age or older, purchasing the maws for collection and investment purposes;
- A primary trafficking route for totoaba swim bladders is from Mexico, at times through the US, and then to Shantou;
- Hong Kong and Thailand may also be transit hubs with Shantou and surrounding areas as the final destination;
- There is evidence that Chinese nationals and/or residents in Mexico and the US are playing an important role in facilitating the totoaba swim bladder trade; and
- Totoaba maws are most commonly shipped hidden within containers of legal fish maw products, such as codfish products.

Given the serious constraints and obstacles associated with the totoaba swim bladder trade in Mexico, including possible corruption and involvement of the drug cartels, it is vital to fully research, investigate, and map all aspects of the totoaba supply chain. That is why this is a multi-part investigation targeting multiple countries. The detailed results of Operation Fake Gold will facilitate concrete action by identifying the key players, building actionable case files based on verifiable evidence, and creating pressure on the Chinese, US, and Mexican governments to act appropriately to save vaquitas and totoabas from extinction.
Elephant Action League protects wildlife through effective intelligence collection and investigative efforts.
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Introduction

An Intelligence-Led Approach

Elephant Action League (EAL) works to merge the worlds of intelligence, investigation, and conservation in the service of wildlife and the people who protect it. At its core, EAL uniquely applies professional intelligence expertise to disrupt the proliferation of environmental crime around the world. Intelligence is the knowledge – ideally the foreknowledge – that EAL, its partners, and governmental authorities can employ to safeguard wildlife and people, and respond to very concrete threats to the environment.

EAL contends that professionally run intelligence is the most important tool in the conservation arsenal against environmental crime, especially for combatting wildlife poaching and trafficking. Most importantly, intelligence is the strategic resource that focuses investigations, law enforcement activities, governmental policy changes, and conservation funding.

EAL supplies its extensive skills and combined experience, both intelligence and law enforcement professionals, to a variety of crime-related environmental emergencies. This intelligence-led approach encompasses information-gathering, intelligence production (collection, corroboration, and analysis), and professional investigations targeting many operational scenarios (e.g., ivory trafficking, rhino poaching and rhino horn trafficking, illegal live trade, the vaquita-totoaba emergency, etc.). It is this expertise and flexibility that allows EAL to operate in situations and locations where other NGOs or governmental agencies are unable or unwilling to operate.

EAL uses its intelligence-led approach to combat wildlife crime as a supplement to more traditional ‘reactive’ conservation models. Through its extensive intelligence network, NGO partners, and trusted law enforcement contacts, EAL facilitates more proactive, impactful, and disruptive outcomes.

EAL’s approach is designed to identify and tell a complete story of the criminal networks and supply chains facilitating wildlife poaching and trafficking. Through human intelligence gathering activities, that is collecting information from human sources through covert methods, and other expert methods, EAL is able to:

- Amass pertinent information and actionable intelligence;
- Build networks of collaborators in the field;
- Research the ‘modus operandi’ of organizations behind illegal trafficking;
- Target individuals and organizations that are profiting from poaching of wildlife and the illegal trade; and
- Share that intelligence with trusted law enforcement agencies through Confidential Intelligence Briefs (CIBs) when possible.

Positive outcomes associated with an intelligence-led approach to include:

- Increased intelligence activity that directly leads to the disruption of the wildlife trafficking networks and supply chains;
- Better quality evidence that facilitates the arrest and prosecution of higher level traffickers, network middlemen, and corrupt officials – the players that truly control the
wildlife supply chains:
- Expanded cooperation among stakeholders, including NGOs, governments, and law enforcement authorities, locally, regionally, and internationally; and
- Facts-based reports that can be used as a leverage by policy makers and media to hold governments accountable and demand action.

It is this approach that EAL is currently applying to *Operation Fake Gold* – an investigation into the illicit totoaba swim bladder trade – a trade network that spans from Mexico to the US, various Asian ports, and finally to China.

The Problem

China’s demand for the swim bladders, or ‘maws,’ from a giant Mexican fish called the totoaba is not only endangering the totoaba population, but also the world’s smallest and most endangered porpoise, the vaquita. Swim bladders are simply an additional organ in certain fish that controls buoyancy. Traditional Chinese medicine purports swim bladder from the fish family *Sciaenidate* (including totoaba) to be a curative for a variety of ailments. Scientific research has yet to identify any real health benefits from consuming swim bladder.

Both totoabas and vaquitas are found only in the northern Gulf of California, Mexico. Fisherman continue to set illegal gillnets to catch valuable totoabas, unintentionally entrapping vaquitas, causing them to suffocate and drown. The International Committee for the Recovery of the Vaquita (CIRVA) estimates that, as of November 2016, no more than 30 vaquitas remain. According to other sources, the population may be down to 28 individuals as of April 2017.

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In response to the dire circumstances facing the vaquita, Elephant Action League (EAL) performed an investigation into the demand side of the illegal totoaba trade in March 2017. EAL’s Chinese investigators, from its Intel & Investigation Unit, looked to assess the current demand for totoaba maw (swim bladder) in southeastern China, attempting to understand how this illegal wildlife product is smuggled from Mexico to China and then sold to Chinese consumers. The investigators went undercover in the Shantou area of China and collected the most up-to-date intelligence on the totoaba maw trade.

Background

Status of the Vaquita

Vaquitas (meaning little cows in Spanish) are a critically endangered porpoise found only in a small area of the upper Gulf of California, Mexico. Vaquitas (Phocena sinus) are unique in that they are the smallest porpoise and have the smallest range of any marine mammal. Based on recommendations from the International Committee for the Recovery of the Vaquita (CIRVA), following continued decline in the vaquita population due to accidental drowning in fishing nets, the Mexican government took extraordinary actions to save the species from extinction. Mexico’s president implemented a two-year ban on gillnet fishing within the vaquita distribution range in April 2015 (Figure 2). Currently, it is estimated that fewer than 30 vaquitas remain in the Gulf of California.4

Up to 5 feet in length, the vaquita is a small cetacean with a rounded head that features a pattern of large black patches around the eyes and lips. They generally live in small groups of one to three individuals, often just a mother and calf pair. Vaquita behavior is typically inconspicuous as they avoid splashing, jumping, or leaping at the water surface. This shy behavior and avoidance of boats makes it difficult to observe and monitor the vaquita population.5

The highest risk to the vaquita is mortality resulting from fisheries by-catch (incidental entrapment in nets), the deaths from which far exceed possible replacement by births. The vaquita’s habitat is surrounded by small fishing villages where fishermen operate...
using small skiffs (pangas) and gillnets with buoys to catch fish and shrimp. The gill-nets used are generally made from transparent or green nylon, making the nets nearly invisible to the vaquita in the murky, muddy water. Vaquitas inadvertently swim into the nets, get caught, and suffocate when they cannot reach the surface to breathe.7

The vaquita was listed as a CITES Appendix I species in 1976, added to the US Endangered Species list in 1979, and listed as critically endangered in 1996 by the IUCN. Scientists have been sounding an alarm for over 20 years that the only way to save the vaquita from extinction is to completely eliminate the use of gillnets in the only region that vaquitas reside.8 Unfortunately, the illegal totoaba fishery saw a resurgence in recent years, fueling further decline of the vaquita.

Given the current estimate of fewer than 30 vaquitas remaining, the Mexican government has decided to take emergency measures to temporarily remove a few of the remaining vaquitas from their threatened environment and create a fully protected sanctuary within the Gulf of California. An international team of experts has created an emergency conservation plan with implementation of recovery operations set to begin in Fall 2017.9 (See Sidebar: Vaquita Removal to Sanctuary for further information.)
Vaquita Removal to Sanctuary

The Government of Mexico’s efforts to address the illegal fishery for totoaba, though expansive and costly, have not adequately stopped totoaba poaching. As a result, the vaquita population has continued to decline due to mortality in gillnets. Therefore, CIRVA has recommended that a few vaquita be removed to a temporary sanctuary in order to prevent extinction. According to CIRVA, “further delay will mean that the population will be too small for such efforts.”

Given how unlikely it is that the ongoing decline of the vaquita population will be reversed, the Mexican government has agreed with CIRVA’s recommendation and commissioned an emergency plan. The emergency conservation plan was developed quickly by an international team of experts, formed into the Consortium for Vaquita Conservation, Protection, and Recovery (VaquitaCPR), as catching and caring for vaquitas may or may not be possible depending on their response to capture. Initial field recovery operations are set to begin in the Fall of 2017.

The emergency conservation plan has now been adopted by Secretaría de Medio Ambiente y Recursos Naturales (SEMARNAT, Mexico). Although some vaquitas will be moved to a sanctuary, efforts to end illegal fishing and remove the threat of gillnets in the upper Gulf of California will continue. Under SEMARNAT’s leadership, VaquitaCPR will implement the emergency plan, with participating organizations from Mexico, Europe, and the US.
Status of the Totoaba

The totoaba (Totoaba macdonaldi) is a large marine fish endemic to the upper Gulf of California, Mexico. Its distinction is that it is the only species in its genus and the largest fish in the family of Sciaenidae, a fish family known for making croaking sounds due to possessing swim bladders, an organ that allows the fish to control buoyancy. Unfortunately, it is their swim bladder, prized by affluent Chinese, that is hastening the demise of the species along with the vaquita.

Totoabas can grow to over 6.5 feet (2 meters), weighing over 220 pounds (100 kg), through a lifespan of approximately 25 years.\textsuperscript{13} They primarily inhabit the upper half of the Gulf and the first 75 feet (23 meters) of the water column, except when spawning in the Colorado River delta.\textsuperscript{14} The species was significantly depleted during the mid-twentieth century due to overfishing and habitat degradation. A total ban on totoaba fishing was declared by the Mexican Government in 1975 and the species was placed on the Mexican Endangered Species List, as well as subsequently listed on CITES Appendix I, the US Endangered Species list, and the IUCN Red List.\textsuperscript{15} The current population status of the totoaba is somewhat unknown, however, according to a study released in 2015, “totoaba maintain their life history and show signs of recovery.”\textsuperscript{16} This statement is qualified by the fact that increased illegal poaching of totoaba in recent years is preventing a long-term positive recovery of the population.\textsuperscript{17}

Even with protections in place, the totoaba population continues to be threatened by poaching and by-catch.\textsuperscript{18} The limited recovery of the species has merely motivated illegal fisherman and, most likely, Mexican criminal cartels to target the totoaba for export of its swim bladders to China for sale on the black market. Swim bladders, or maw, are largely bought by wealthy Chinese as “collection items or gifts” or as a financial investment.\textsuperscript{19}
“It’s obvious that to get this product abroad [to China], we’re dealing with some sort of organized groups. We just can’t say if it’s specifically organized crime.”

Garcia Pereda, PROFEPA (Mexican EPA)

In 2015, the Mexican environmental agency, PROFEPA, revealed that one kilogram of totoaba maw was selling for the same price as 1.5 kilograms of cocaine. Due to this high street value, the totoaba swim bladder has been referred to as “aquatic cocaine.”

According to an anonymous Mexican army source, reported in 2016, established drug traffickers entered the totoaba maw trade forcefully and applied their “organizational structures and their corrupting influence” to the trade. Organized cartels repurposed established “networks, routes, contacts, points of sale, and padrinos” [sponsors] working in official institutions to facilitate the trafficking of totoaba swim bladders to China. (See Sidebar: Mexican Cartels Trafficking Totoaba Maw for further information.)
Fish Maw & Its Use in China

Fish maw, or dried swim bladder, became treasured as a nutritional and medicinal product by the Chinese millennia ago. It is one of four traditional Chinese delicacies from the sea, including abalone, sea cucumber, and shark fin. In modern times, fish maw has become a favorite ingredient for cuisine served at special occasions, such as birthdays, weddings, and Chinese New Year; is presented as a gift for similar occasions; is purchased as an investment; and processed into skincare products.

According to traditional Chinese medicine, fish maw contains rich proteins and nutrients important for general health, nourishes ‘yin,’ replenishes kidneys, and boosts stamina. It is considered suitable for consumption by any age group and either gender as a therapeutic food. Many Chinese believe that drinking fish maw soup and eating fish maw will improve their skin and, for pregnant women, the skin of their babies.

Fish maw can be prepared from a variety of fish, but the value of a particular maw is determined by its species, size, thickness, and color, among other characteristics. In general, the larger and thicker maws are most valuable, and male maws are more valuable than female maws. Among fish maw options, the most rare and expensive maw is called “the gold coin fish maw” (jin qian jiao), which is from the bahaba, giant yellow croaker (*Bahaba taipingensis*), an endemic fish found off the coast of China from the Yangtze River estuary southwards to the Pearl River estuary, including the waters off Hong Kong and Macau.
Fisherman: As I know, gold coin fish maw (jin qian jiao) is talking about a shape of the fish maw, like a piece of coin, not fish maw from a particular species of fish. Nowadays most people who could make gold coin fish maw have died. The most precious fish maw, which are called gold coin fish maw, come from Yellow Min fish, but nowadays most gold coin fish maw are not from Yellow Min fish, but from other similar fishes as fake gold coin fish maw, and these fishes often come from Brazil, Java island of Indonesia, and other places. There are two kind of Min fish, yellow and grey. True Yellow Min fishes in Hong Kong are very rare, super expensive and you could not even find it to buy even if you want.

'Gold coin' fish maw became extremely precious to the Chinese long ago when transportation and medical care were antiquated. Women frequently died from hemorrhaging during child birth and it was thought that eating gold coin fish maw would stop the bleeding very quickly. This belief was strong in southeast China, especially in the area of Shantou. As a result, gold coin fish maw is considered life-saving and many Shantou families store at least one maw in the house at all times. Many families also purchase gold coin fish maw as a dowry for their children’s’ weddings.

S: The best fish maw in China must come from Shantou or Nan’ao. Because the water here is not polluted. They only come here to breed. They don’t eat bate here so it’s very difficult to catch them. You could only catch them by chance. Last year a fisherman caught two and they were sold at about 1 million Yuan (USD 145,000). Only three or four could be caught per year. Often gold coin fish maw were kept as collections and would not be eaten immediately.

S: The Mexico ones [totoaba maw] are good. But the African ones are not as good. The Mexico ones have medical effects. This fish maw is seen as precious because a long time ago, when transport and medical conditions were bad, many women could die of hemorrhaging when giving birth, and eating the gold coin fish maw could stop bleeding in an amazing speed. Therefore, the gold coin fish maw is seen as a life-saver and many families in Shantou would at least obtain one to keep in the house, for the potential need. The foreign ones we don’t know the effect but the domestic ones we know it from history. Here in Nan’ao we usually don’t sell the foreign ones. Domestic small ones are about 60,000 Yuan (USD 8,700) per half kilo.
EAL Investigation - Audio S1
Tongxinghao medicine and food store, Fuhe Market
March 7, 2017

S: There are domestic ones and foreign ones. Domestic is the most expensive. Foreign ones have many kinds. [...] gold coin fish maw is the most precious one it can save people's life. When it comes to the medical use, domestic ones are far better than foreign ones. [...] Foreign ones' medical effect is similar to other normal swimming bladders in China but domestic gold coin fish maw is life-saving. When you are in a situation that you keep bleeding, if you eat gold coin fish maw, you will stop bleeding immediately.

Latin America has become a hot spot for the billion-dollar eco-trafficking industry and the region's transnational criminal organizations appear to have entered the market. Of particular interest for criminal organizations in Mexico is the illicit poaching and trafficking of totoaba swim bladders. There is evidence that drug traffickers have been involved in the trade for some time as the profits are large and the risk is low.

The volume of seizures, primarily in Mexico and the US, of trafficked totoaba fish bladder identify the trade as being large scale and extremely profitable. For example, in 2013, 200 totoaba swim bladders were seized by US border authorities in California. The bladders were valued at $3.6 million.


31. “One of the Most Sought-after Aphrodisiacs in the World Is Pushing a Species Fish to Extinction.”

The bahaba fishery collapsed due to overfishing in the early to mid twentieth century and now is critically endangered and extremely close to extinction. No spawning populations are known to exist and, given the heavy fishing pressure in southern China, there are likely to be few or no refuges remaining for species recovery.29 As a result, original gold coin fish maw made from bahaba is no longer available.

Totoaba is considered the best replacement for original gold coin fish maw because of its similarity to the bahaba fish. Now, in the fish maw market, endemic bahaba maws are called ‘domestic’ or ‘small tube’ maws and the totoaba maw is called ‘foreign,’ or ‘big tube’ maw.

In another case, in 2014, a murder of a Mexican drug trafficker and organized crime boss was linked to his alleged participation in totoaba trafficking activities.33

Until very recently, weak law enforcement in Mexico made the trade low-risk and high-profit for organized crime, especially as compared to drug trafficking.34 Although the Government of Mexico has improved its enforcement efforts, poaching and trafficking of the totoaba has continued to be easy money for these criminal networks.

33. “One of the Most Sought-after Aphrodisiacs in the World Is Pushing a Species Fish to Extinction.”

34. Yagoub, “‘Narco Fish’ Trafficking Easy Money for Mexico Criminals.”

35. A photo shown to EAL investigators by a trader; the small tube is much shorter, but the color is a result of years of storage.
“Like ants, they move them [totoaba swim bladders] in small quantities, bit by bit. They’re smuggled. They’re put on commercial flights and commercial shipping companies where they make their way into Shanghai, Hong Kong, often through the United States or Japan.”

**Garcia Pereda, PROFEPA (Mexican EPA)**

**Operation Fake Gold**

The primary trading hub for totoaba maw lies not in Hong Kong or Guangzhou, but in a small city in the Guangdong Province called Shantou. In order to pinpoint how this illegal wildlife product is smuggled from Mexico to this specific area in China, EAL decided to send its undercover investigators directly to the Shantou area of China at the beginning of March 2017. EAL’s Chinese team collaborated with local Shantou contacts to interview two totoaba maw experts and ultimately target 25 fish maw shops for investigation.

In Shantou, the local dialect is extremely difficult to understand as it is not based on Cantonese or Mandarin - even other people in Guangdong Province cannot generally understand. EAL’s investigative team includes a native speaker of the dialect who was able to provide access to a network of collaborators in Shantou to assist the investigation.

Through the use of hidden cameras and audio equipment, the team recorded its meetings with fish maw vendors. A detailed list of the shops visited, including whether totoaba maw was being offered for sale (in the shop or through other means), is included in Appendix of this report.

**Note:** All transcripts included in this report were originally recorded by EAL’s investigative team in the local Chinese dialect. Every effort has been made to produce accurate translation of the conversations.

In each quote, I = Investigators and S = Shop Owners/Workers.

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Locations

The team’s first stop was Fuhe market in Shantou. This market, which includes approximately 20 shops selling goods primarily on a wholesale basis, was chosen because it was identified as the center, and possibly the origin, of the totoaba maw trade. Seven shops within the market were chosen randomly to be included in the undercover investigation. The number was limited so that the team would not be compromised by vendors becoming suspicious of this group of visitors asking too many questions. Nearly all shops visited initially denied offering totoaba maw, but later confirmed that ‘gold coin’ fish maw was available for sale once the team gained a little trust. The team was able to confirm that the ‘gold coin’ fish maw was in fact ‘big tube,’ meaning totoaba.

Another location in Shantou, Xinghua market, a 50-shop market focusing more on medicinal products, was chosen because a few vendors in Fuhe market referred the team to Xinghua. The team visited five shops based on these recommendations. Similar to Fuhe vendors, vendors in Xinghua market were vigilant in their distrust of unfamiliar customers looking for totoaba maw. Once some trust was established, it became clear that totoaba maw was available at Xinhua market, but primarily through the larger shops that could afford to deal in this high-value product.

There are other scattered fish maw shops throughout Shantou and six were chosen for the team to visit. One of the team’s collaborators identified a family member that has a business relationship with one particular fish maw shop. This connection provided an in-depth description of the totoaba maw trade, including the trafficking routes and methods used to supply the trade.
EAL Team Interview with Fish Maw Trader
March 7, 2017

Trader: In Shantou, only Nan’ao Island produces fish maw. Fuhe market, located at the back of Jinfengtan, is considered the origin of the fish maw market, where fish maws are traded in bags. Through some immigrants, knowledge of fish maw was spread into Hong Kong. Hong Kong did well in branding, therefore, through Hong Kong fish maw was promoted to other places. Those who run shops in Yide road in Guangzhou all have shops in Fuhe market.

Trader: Nowadays, importing fish maw into China requires industry old professionals to manage. Hong Kong is used as the connecting point.

Trader: In Shantou, gold coin fish maw is usually treated as the priceless treasure of a shop so they are not labeled a price and not on sale (openly). These shops don’t collect these things particularly. The reason is that first you could only get these things by chance. Second, it is illegal. They are so priceless that they will not be traded openly.

During investigations in Shantou, contacts pointed the team to Nan’ao Island as another important hub for fish maw trade, both for production and sale ‘gold coin’ fish maw. As a result, the investigative team chose three shops in the concentrated Haibin Road area by the sea, as well as four shops scattered around the island. The selections were originally random, but then targeted to larger, higher class shops as they were more likely to offer ‘gold coin’ fish maw.

In Nan’ao, shops were selling ‘gold coin’ fish maw at much lower prices than shops in Shantou. It appeared that many shops preferred to focus on selling local fish maw products, while only a few of those high-class shops offered ‘gold coin’ fish maw, primarily foreign (totoaba). The level of vigilance by vendors was much lower than in Shantou, as some vendors were still openly displaying totoaba fish maw for sale. While some vendors claimed the sale of this product was not illegal, others vendors indicated that government inspectors would notify them before showing up for an inspection. This way, the vendors could hide any banned products, like totoaba maw.

Undercover footage filmed by EAL
Fraudulent Maws

According to a number of sources, the fish maw markets in both Shantou and Nan’ao Island are full of fake products, especially when it comes to ‘gold coin’ fish maw. During the investigation, some vendors did try to sell the team ‘big tube/foreign’ as ‘small tube/domestic’ gold coin fish maw, as well as bleached and low quality fish maw as high quality maw.

EAL Team Interview with Hong Kong Fisherman
March 6, 2017

Fisherman: Some of the tubes of the gold coin fish maw on the market are man-made. The tube is difficult to be taken out nicely without damage. There are even machines that could mash fish maw and make it into any shape you want. Lots of fish maw on the market in Guangzhou is fake. For example, the swimming bladder of sea eels has two blood prints on it, but the sea eel maw in Guangzhou market don’t even have the prints.

EAL Investigation – Audio S6-5
March 10, 2017

S: Haimen used to have lots of aquatic product, now, they have to import aquatic product from foreign because of overfishing.

I: Is available for them to use foreign fish maw replace domestic ones?

S: Yeah, only it looks big and wealthy.

S: I can show you some picture about small tube (domestic gold coin fish maw).

[...]

I: It’s really different I saw it before.

S: Yeah, small tube is more shorter and slim than big tube. It’s very hard to find small tube at market, so all of gold coin fish maw is fake.

Most vendors consider ‘big tube’ totoaba maw to be medicinally inferior to ‘small tube’ bahaba maw. In fact, some vendors considered the totoaba maw to be inferior to other fish maw costing much less, such as Chizui (red mouth fish maw). Vendors in Nan’ao referred to totoaba maw as ‘fake gold coin fish maw’ and did not push the sale of this product.
I: Do you also have gold coin fish maw? We have seen some in the past shops.

S: Those are super expensive. We have them but we do not display them.

I: Are many fake?

S: Not fake, they are just from outside, other countries.

I: So the ones people are selling at 80,000 Yuan (USD 11,600) per half kilo, are they domestic?

S: There are no domestic bladders nowadays. For medical use, domestic ones are far better than the foreign ones. Domestic ones are about 1 million Yuan per half kilo. So the 80,000 ones they must be foreign. In terms of medical use, the foreign gold coin fish maw is not even as good as Chizui maw.

S: Normal maw is for blood nutrition but gold coin fish maw is for stopping bleeding.

Normally you don’t eat gold coin fish maw, you keep it for emergency use only. Unless you want to send some as a gift for an important matter, you don’t need to send gold coin fish maws. Nowadays there is only foreign gold coin fish maws, no domestic ones.

I: So the foreign ones are from brazil?

S: Not Brazil, Mexico. Big pipe gold coin fish maws are from Mexico. We also have these ones from Mexico. They are only 2,000 Yuan (USD 290) per half kilo, but the medical uses are almost the same. If you want to send a gift to people from another province, you could buy this Huanghua fish maw. They are only 2,000 and they look very nice.

I: If we want to buy gold coin fish maw, do you have it?

S: Yes. Depends on the weight and how nice it looks, the prices vary between 40,000 to more than 80,000 Yuan.
I: So what is the most important factor in the fish maw's price?

S: Where the fish come from, the size and the age.

I: So how much are the foreign ones here in Nan’ao Island?

S: No, we don't have foreign ones. In Nan’ao, we sell only domestic fish maw. If you want foreign ones, you don't need to come here. They are everywhere outside.

I: So are those foreign ones the same species as the domestic gold coin fish maw?

S: No. They are different.

I: But why are they all called gold coin fish maw?

S: Because the foreign ones look similar to the domestic real gold coin fish maw. They make their fish maw look like real gold coin fish maw. But actually it's different. And foreign [maws] don't have the same good medical effect.
Key Findings

Demand

The demand for ‘gold coin’ fish maws appear to be stable, with buyers primarily from Shantou and the greater Guandong Province. This kind of fish maw is not recognized as particularly valuable in other Chinese provinces. The main trading cities are Shantou, Nan’ao Island, Haimen, Guangzhou, Hong Kong, and a few other major cities in Guangdong Province.

Demand for totoaba maws (and ‘gold coin’ maws in general) is driven somewhat by its use as a business gift, but primarily by its traditional medicinal uses for personal health and, in some locations, its use for wedding dowries. Although demand is usually for medicinal purposes, most buyers do not immediately consume totoaba maws. Instead, this high-value maw is kept alone or as a part of a collection for use only under certain circumstances, such as when a woman in the family is giving birth. Additionally, totoaba maw has an investment value for its buyers as the price is expected to increase as the product ages. It is thought that the older the maw, the more the nutritional content develops.

In recent years, totoaba maw did become a luxury item that people use as gifts in business. This was especially true before China’s anti-corruption campaign commenced in 2012. Individuals would send ‘gold coin’ totoaba maws as gifts to government officials in exchange for beneficial business treatment. Since the anti-corruption campaign was implemented, this practice has diminished dramatically, thus reducing the demand for totoaba maws somewhat from a peak in 2010 to 2011. However, a number of vendors approached during this investigation indicated that the nature of ‘gold coin’ fish maw as an investment vehicle would keep the value stable for many years.
Availability

The availability of totoaba maw in Shantou is still significant. Among the 18 shops visited by the investigative team during the first two weeks of March 2017, 60 percent of the shops admitted to carrying ‘gold coin’ fish maw for sale, almost all of which were ‘foreign’ maws, which equates to ‘big tube’ totoaba maws. 24 percent of the shops presented the actual merchandise to EAL investigators – 39 totoaba maws were viewed in total during the investigation – and 12% of shops openly displayed totoaba maws for sale. Some vendors indicated that all fish maw shops used to sell totoaba maw openly, but due to a expanded law enforcement efforts most shops have taken to selling it behind closed doors and only to trusted customers.

On Nan’ao Island, fewer shops were offering totoaba maws. This is likely because the market in Nan-ao is somewhat geared toward the sale of locally produced fish maw, and a number of the vendors described totoaba maw as fake ‘gold coin’ fish maw.

Pricing

‘Gold coin’ fish maw pricing varies significantly based on weight, appearance, and whether it is small tube/domestic or big tube/foreign. Small tube/domestic ‘gold coin’ fish maws, which is very difficult to find, can cost over a million Yuan (RMB) per kg. The big tube totoaba maws from Mexico currently average about 140,000 Yuan (RMB) per kg (over USD 20,000 per kg).

EAL Investigation – Audio S6 – 1st Visit, Shantou March 7, 2017

I: Do you still have gold coin fish maw? I heard your daughter said her father has just sold a gold coin fish maw at over 100,000 Yuan (USD 14,500).

S: Just sold out.

I: Domestic or foreign?
S: From the US. About 70,000 Yuan per half kilo (USD 10,000).

S: Last year it was 60,000 per half kilo. This year is 70,000 per half kilo. This year the price is raised a little. The price will be raised continually later. Two or three years ago, it costs hundreds of thousands.

I: Where do big pipe ones come from?

S: Mexico.

S: And they are usually hidden in other fish maws, such as codfish fish maw. Codfish fish maw is very cheap, such as 300 Yuan per half kilo. We don't sell it.

EAL Investigation – Audio N7 – Haibin Road
March 7, 2017

At first they were very expensive. But later because they caught too many so the price went down. Five years ago those ones like this big are sold at 50,000 per piece. Later Gold coin fish maw’s price went down for like ten times and many people lost lots of money on them. 2 years ago it was the lowest point of the price. Now the price is going up because the fishing is banned.

The price of totoaba maw was as high as a few hundred thousand Yuan per half kg back in 2010 when buyers fully considered totoaba maw as true ‘gold coin’ fish maw. It then declined to a range of 100,000 to 120,000 Yuan per kg in 2015 due to oversupply. The price has been slowly increasing over the past two years as supply has decreased.

EAL Investigation – Audio S8 – Dongxia South Road, Shantou
March 10, 2017

I: Another boss told me that gold coin fish maw is best one.

S: Yes, we also have gold coin fish maw, do you want buy some?

I: How much?

S: It's depends on their size, in general is 100,000-140,000 yuan per kilogram.

Figure 3 below represents the average prices by size as quoted to the team during the investigation.
<table>
<thead>
<tr>
<th>Weight (g) per piece</th>
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<th>Approx. Price (USD)</th>
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<tr>
<td>100-150</td>
<td>100000</td>
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<td>piece</td>
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<tr>
<td>150-200</td>
<td>40000 – 160000</td>
<td>5,800 – 23,000</td>
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<tr>
<td>200-300</td>
<td>60000 – 100000</td>
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<td>piece</td>
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<tr>
<td>300-400</td>
<td>110000 – 180000</td>
<td>16,000 – 26,000</td>
<td>piece</td>
</tr>
<tr>
<td>400-450</td>
<td>200000 – 210000</td>
<td>29,000 – 30,400</td>
<td>piece</td>
</tr>
</tbody>
</table>

Figure 3: Average pricing of totoaba maw as of March 2017

EAL Investigation – Audio S18 – Xinghua Market
March 12, 2017

S: This one [large, old gold coin maw] is over hundreds of thousands, about 400,000 to 500,000 Yuan. But we have new ones which cost tens of thousands.

S: The small ones are about 20,000 per half kilo. So per piece is about 50 grams and sells at several thousand.

S: Over the past few months, there are no new gold coin fish maws coming.

S: They are from (redacted for investigative reasons).

EAL Investigation – Audio N7 – Haibin Road, Nan’ao Island
March 7, 2017

I: Do you have gold coin fish maw?

S: Yes. But they are very expensive. Look at this one. It’s good. (He pointed at one on display in the shop.)

I: Is this domestic?

S: No. It’s foreign, from Mexico. The small ones are a few thousand per piece. 100 Yuan per gram, 50,000 Yuan per half kilo.
Consumers & Investors

Due to its extremely high price, current consumers of what is considered ‘gold coin’ fish maws are relatively rich Chinese, primarily middle age or older. Vendors confirmed that only well-off individuals are able to buy this type of fish maw. In fact, when asked about which maws to send as gifts to business associates or other officials, most shop owners did not initially recommend ‘gold coin’ fish maw. A few even indicated that there would be no need to spend so much for a gift, especially since big tube/totoaba fish maws are an inferior product in their opinion. A number of vendors, indeed, insisted on the greater effectiveness of Chizui for medical use.

Once the team was able to build enough trust, a few vendors said frankly that it really depends on what you need from the business associate or official as to how much money should be spent on a gift. They have observed customers buying ‘gold coin’ fish maw in the past to use as gifts when the matter at hand was extremely important and valuable, such as winning a contract bid. They imagine that many government officials have more ‘gold coin’ fish maws stored in their homes than even the traders do at any given time.

EAL Investigation – Audio N1 – Nan’ao Island
March 7, 2017

I: Which should I buy to send to people as a gift?

S: These ones are good. They are Min fish maws. All domestic. This one is 2,000 Yuan per half kilo. That one is 1,500 Yuan.

I: Do you have gold coin fish maw?

S: Gold coin fish maw is way too expensive to send as gift.

I: I want to give something expensive as a gift.

S: Then you could buy bigger Min fish maw. Or this one. Chizui. 20,000 Yuan per half kilo. This one is 0.7 gram. Gold coin fish maw is too expensive.

I: We learned from the internet about gold coin fish maw....

S: The pictures you see on the internet about gold coin fish maw with pipes, that’s not real gold coin fish maw. These are made from foreign fishes and not valuable. And the quality and medical effect are not as good as these domestic Min fish maw. Domestic gold coin fish maw in Nan’ao is too rare.

More commonly than business gift givers, though, are rich consumers buying ‘gold coin’ fish maws for collection and investment purposes and self-use. Collection and investment values have created a few organized consumer groups as well. Several fish maw traders indicated that they themselves invest in buying and collecting valuable fish maws, knowing the price will hold or rise over time.
Law Enforcement

In Shantou, law enforcement of illicit trafficking and sales of wildlife products, including totoaba maws, has heightened in recent years. As a result, vendors have moved to selling totoaba maws behind closed doors, being vigilant about selling only to known and trusted consumers. As far as the vendors know, there have been no seizures of totoaba maws in Shantou, but they were informed by the Chinese government about the complete ban on totoaba fishing in Mexico and they understand that sale of the product is in fact illegal.

A law enforcement campaign to educate fish maw vendors was completed from October 2016 through the Chinese New Year. During the investigation, the majority of vendors did mention that it is illegal to sell the team totoaba maw.

EAL Investigation - Audio N7 - Haibin Road, Nan’ao Island
March 7, 2017

S: Because of the anti corruption campaign, government officials don’t send or get them [gold coin maws] a lot, but the businessmen are okay.

I: If it’s illegal why do you put them on display?

S: Because (when) the government comes to check, they call and inform us earlier and we will hide them when they come.

In Nan’ao, law enforcement efforts to prohibit the sale totoaba maws is much more lax. Only 14.3% of shop owners indicated that the sale of ‘gold coin’ fish maw is illegal. In fact, none of the shops visited showed any caution in their response when asked about this product. One large fish maw shop openly displayed totoaba maws together with many other illegal products such as tiger bone wine, red coral, and precious shells, claiming “the government would call to inform us before they come to check.”

Smuggling Routes & Methods

According to a few unverified sources, a primary trafficking route for totoaba swim bladders is Mexico to the US to Shantou. Another source indicated that Hong Kong and Thailand may also be transit hubs with Shantou and surrounding areas still being the final destination.
EAL Investigation – Audio S12 – Shantou
March 10, 2017

S: All these gold coin fish maws are from a port that is located on the border of the United States and Mexico.

S: Several years ago, big tube is very expensive because it’s rare, but now, more and more big tube appears in market, so the price goes down.

S: Red mouth fish maw has same curative effect as gold coin fish maw. If you buy it for yourself, I recommend you buy red mouth fish maw because it’s more cost-effective.

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Map 2: Main routes for totoaba swim bladder trafficking

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EAL Investigation – Audio S6 – 2nd Visit, Shantou
March 10, 2017

S: Thailand and Hong Kong are transit countries. Supervisory system in Thailand is not strict.

I: When did the foreign gold coin fish maw come into China?

S: It always have, you don’t know because the shop owner lie to you that they are all domestic fish maws.

S: Actually, they have same curative effect because they live in same [type of] sea.
S: They are all from (redacted for investigative reasons).

S: If the one gold coin fish maw is a little bigger than another, the price will be far higher than the smaller one, maybe several times higher.

S: They are smuggled from (redacted) by ships.

S: Most costumers are from Shantou and people introduced by Shantou friends.

There is evidence that Chinese nationals and/or residents in Mexico and US are playing an important role in facilitating the trade. They are connected with fish maw traders in China who rarely go overseas themselves to purchase the maws. It can only be assumed that these Chinese living in Mexico, and possibly the US, work directly with their Mexican counterparts, whether they be cartel members or individual traders, to source the totoaba swim bladders.

S: In different production area, like Indonesia and Mexico, we have friends there to go to different places to collect them for us. We will go to several places to see every year but we mainly depend on our friends. Every country you go to, you see lots of Chinese there, my friends there already have the network there.

Totoaba maws are most commonly shipped hidden within containers of legal fish maw products, such as codfish fish products. Upon arriving in China, totoaba maws are distributed from the destination hubs like Hong Kong and Shantou to Haimen, Nan’ao Island, and surrounding areas.

S: And they are usually hidden in other fish maws, such as codfish fish maw. Codfish fish maw is very cheap, such as 300 Yuan per half kilo. We don't sell it.
The Sea Shepherd Conservation Society was back in the Gulf of California in the fall of 2016 for Operation Milagro III to save the near extinct vaquita and the endangered totoaba bass.

During Operation Milagro III, Sea Shepherd once again partnered with the Mexican government to address the urgent need to protect the critically endangered vaquita before it is too late. Sea Shepherd vessels, the M/V Farley Mowat and the M/Y Sam Simon, are protecting the vaquita marine reserve, patrolling for poachers, and removing the illegal gillnets that are trapping not just the totoaba, and vaquita, but whales, sharks, dolphins, sea lions, turtles, rays, crabs and more.

“Our collaboration with the Mexican authorities in patrolling the area and retrieving nets is highly important to the safety of the vaquita refuge and marine reserve. The more boats Sea Shepherd has in the area, the better we can guard against poaching,” said Campaign Leader and Director of Ship Operations, Captain Oona Layolle.

The more successful Sea Shepherd’s work in retrieving the illegal nets, and aiding in poacher arrests, the more threats the organization has received. Protesting fishermen, led by one of San Felipe’s fishing cooperative leaders, held a demonstration on March 26th, 2017 where they threatened to burn Sea Shepherd ships if they were still in the Gulf by March 30th at 14:00 hours.
At the demonstration, the fisherman and their leader took a small local fishing boat, known as a ‘panga,’ painted Sea Shepherd’s name on it, and burned it in the streets of San Felipe. The act served as a warning that they would do the same with the anti-poaching organization’s ships, the Sam Simon and Farley Mowat, if they did not exit Mexican waters. The demonstration ended with the leader promising to attack the Sea Shepherd crew with 200 pangas on March 30th, 2017.

When that date arrived, Mexican Navy vessels acted as escorts for the Sam Simon and Farley Mowat in case a clash occurred.

On April 5th, 2017, a Mexican judge ratified a restraining order to the fisherman and their group leader, forbidding them to speak, threaten and harass Captain Layolle and the Sea Shepherd crew aboard the Sam Simon and the Farley Mowat. The fishermen have been ordered not come near the ships and land base.

“Sea Shepherd very much appreciated the effective measures taken by the Mexican government to quell what was potentially a very explosive and violent situation,” said Sea Shepherd Founder and CEO, Captain Paul Watson.

“Sea Shepherd is not in the area to oppose legal fishing activities,” said Captain Layolle. “Sea Shepherd’s actions are focused on illegal fishing and the only fishermen who have any reason to be angry with the Sea Shepherd ships are those whose illegal activities are being disrupted and shut down by Sea Shepherd crews.”

On April 8th 2017, the Sam Simon pulled up its 100th illegal gill net from the Gulf of California, which was promptly followed by illegal gill net number 101 and number 102.

That same day, the Farley Mowat pulled up 2 nets, which brought the total of illegal fishing devices retrieved from the Upper Gulf of California since last December to 200.

It is both a great result achieved by the two Sea Shepherd vessels and their crews, but at the same time, very disturbing, as this proves that there are still many nets laying under the surface, continuing to kill wild animals, including the endangered totoaba and the near-extinct vaquita.

Operation Milagro III will continue until mid-June 2017.
Conclusion & Next Steps

The fate of the world’s smallest porpoise, the vaquita, is disastrously entwined with the continued poaching of Mexico’s totoaba. Elephant Action League (EAL), in response to the vaquita’s continued decline, performed part one of its multi-part investigation into the totoaba swim bladder supply chain in March 2017.

Part one of Operation Fake Gold targeted the demand side of the totoaba trade, assessing the current level of trade, the attitude of the retailers who illegally sell it, and the price trends, as well as determining how and where totoaba swim bladders (maws) are smuggled into China. This undercover investigation identified the following key findings:

- The demand for ‘gold coin’/totoaba maws appears to be stable, with buyers primarily from Shantou and the greater Guandong Province.

- Demand for totoaba maws (and ‘gold coin’ maws in general) is driven by its use as a business gift, as well as its traditional medicinal uses for personal health and, in some locations, its use for wedding dowries.

- The availability of totoaba maws in Shantou is still significant; demand has not dropped off even though the product is illegal in China.

- Fewer shops are offering totoaba maws on Nan’ao Island than in Shantou.
• 'Gold coin' fish maw pricing varies significantly based on weight, appearance, and whether it is small tube/domestic or big tube/foreign, as well as between shops.

• The big tube totoaba maws from Mexico currently average about 140,000 Yuan (RMB) per kg (over USD 20,000 per kg).

• Due to its extremely high price, current consumers of totoaba maws are relatively rich Chinese, primarily middle age or older.

• Many rich consumers are buying totoaba maws for collection and investment purposes and self-use.

• In Shantou, law enforcement of illicit trafficking and sales of wildlife products, including totoaba maws, has heightened in recent years.

• In Nan’ao, law enforcement efforts to prohibit the sale totoaba maws is much more lax.

• A primary trafficking route for totoaba swim bladders is from Mexico, at times through the US, and then to Shantou.

• Hong Kong and Thailand may also be transit hubs with Shantou and surrounding areas still being the final destination.

• There is evidence that Chinese nationals and/or residents in Mexico and the US are playing an important role in facilitating the totoaba swim bladder trade.

• Totoaba maws are most commonly shipped hidden within containers of legal fish maw products, such as codfish fish products.

EAL’s Operation Fake Gold investigative team gathered important intelligence in China that will inform part two of the investigation. The leads received identify other locations outside of China, including in the US and Mexico, that will require additional field investigations in order to fully map the totoaba maw supply chain. EAL is currently developing an investigative strategy for part two of Operation Fake Gold. Part two of the investigation will be commencing in the 2nd quarter of 2017.

Given the serious constraints and obstacles associated with the totoaba swim bladder trade in Mexico, including possible corruption and involvement of the drug cartels, it is vital to fully research, investigate, and map all aspects of the totoaba supply chain. The detailed results of this investigation will facilitate concrete action by identifying the key players, building actionable case files based on verifiable evidence, and creating pressure on the Chinese, US, and Mexican governments to act appropriately to save vaquitas and totoabas from extinction.
### Appendix: List of Markets & Shops

<table>
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<tr>
<th>Sites</th>
<th>City</th>
<th>Location</th>
<th>Gold Coin Maw Available</th>
<th>Comments</th>
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<tr>
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<td>YES</td>
<td>Aprox 10 GC Maws; Avarage Price: 70,000; No.1 Price: 105,000 Yuan/piece; Size: 400-450 grams; No.2 Price: 50,000 Yuan/piece; Size: 100-130 grams; No.3 Price: 2,3000 Yuan/half kilo for maws smaller than 100 grams;</td>
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<td>Gold Coin Maw Available</td>
<td>Comments</td>
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<td>Aprox 4 GC Maws No.1 Price: 56,000 Yuan/piece; Size: 322 grams; No.2 Price: 48,000 Yuan/piece; Size: 256 grams;</td>
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OPERATION FAKE GOLD - PART I
Investigating the Southeast China Totoaba Maw Trade as this Traditional Product is Causing the Extinction of Both the Vaquita and the Totoaba

ACKNOWLEDGMENTS
The Elephant Action League (EAL) wishes to thank our great investigators and collaborators on the ground, whose identity must remain confidential for security reasons.

CITATION
Crosta, A., Sutherland, K., (2017). "Operation Fake Gold"
May 2017

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www.elephantleague.org
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Investigating the Southeast China Totoaba Maw Trade as this Traditional Product is Causing the Extinction of Both the Vaquita and the Totoaba