



THE ISSUE

Fish maw, the processed air bladder of fish, is regarded in traditional Chinese culture as one of the top marine delicacies alongside abalone, sea cucumber, and shark fin. In the 2010s, dried fish maw became a widely accepted alternative to shark fin soup. It is generally believed that fish maw is good for health, especially for skin and recovery after surgery, possibly due to its high collagen content.

The swim bladder of totoaba (*Totoaba macdonaldi*), which is only found in the Gulf of California, is regarded as the 'king of fish maw'. However, the population has been seriously depleted due to overfishing and habitat alteration. Totoaba is listed as Critically Endangered on the IUCN Red List, and is listed on Appendix I of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), meaning the commercial trade of this species is prohibited.

In 2015, the illegal trade of totoaba in Hong Kong was unveiled by an undercover investigation. Illicit international trade on totoaba is common. In 2018, 1.9 kilograms of suspected totoaba fish maw with an estimated market value of about HK\$300,000 was seized at Hong Kong International Airport. The two visitors from Mexico who smuggled the maw were jailed, one for 14 weeks and one for 10 weeks. The illegal trade in totoaba is linked to organized crime in Mexico.

The huge demand for totoaba is driving another marine species to extinction. Vaquita, the world's smallest porpoise, found only in the upper Gulf of California, is a common bycatch in nets set for totoaba. As of today, there fewer than 10 Vaquitas left in the world.

The fish maw trade is also responsible for the overfishing of at least two other species: the Gulf corvina from Mexico (Vulnerable, IUCN) and the Chinese bahaba (*Bahaba taipingensis*), (Critically Endangered, IUCN; a State Protected Species in mainland China; not protected in Hong Kong).

WHAT WE ARE DOING

In 2015, WWF-Hong Kong successfully advocated the government to allocate a specific trade commodity code in Hong Kong for dried fish maw. The trade code has provide data showing the dried maw trade in Hong Kong is both large-scale and lucrative, with a declared import volume of 3,882 tonnes, valued at more than HK\$3.7 billion in 2018.

Although the fish maw found in Hong Kong markets may not be sourced from totoaba, there is a lack of information on other species, trade flows, and source locations. There are likely strong links to threatened species, illegal trade, and organized crime. One of the challenges of understanding the trade's impact is that fish maw is difficult to identify to species and may be reconstituted from one or more less valuable species to appear like a maw from a more valuable species. The true impact of the fish maw trade needs to be properly evaluated. WWF-Hong Kong is planning to conduct a fish maw market survey in Hong Kong to facilitate our understanding of species involved and the nature of the trade.

OUR ASK

In order to prevent the illicit trade of totoaba, WWF-Hong Kong urges the government to treat wildlife crime as a serious crime to comply with Hong Kong's international obligations.

Wildlife smuggling should be included under Schedule 1 of the Organized and Serious Crimes Ordinance (OSCO) to further deter transnational criminal enterprises that use Hong Kong as a major port and transportation hub for wildlife smuggling. We must do more by treating wildlife crime as a predicate offence for money laundering and use, using Anti-Money Laundering (AML) tools in the prosecution of wildlife crime offences, in compliance with the Financial Action Task Force (FATF) Recommendation 30. The government must strictly implement CITES regulations and enhance enforcement at entry/exit ports and businesses.

The precautionary principle should be used in the fish maw trade. It is essential to develop a clear chain of custody of fish maw so that the source locality and species can be confidently traced. Until this occurs, any fish maw that occurs within the natural range of variation of size for bahaba and totoaba should be banned.