

May 18, 2017

PETITION TO BAN IMPORTS OF FISH AND FISH PRODUCTS FROM  
MEXICO THAT RESULT IN THE INCIDENTAL KILL OR SERIOUS  
INJURY OF VAQUITA IN EXCESS OF UNITED STATES STANDARDS  
PURSUANT TO MARINE MAMMAL PROTECTION ACT SECTION 101

---

BEFORE THE DEPARTMENT OF HOMELAND SECURITY, THE DEPARTMENT OF THE  
TREASURY, AND THE DEPARTMENT OF COMMERCE

Natural Resources Defense Council  
Center for Biological Diversity  
Animal Welfare Institute

## NOTICE OF PETITION

John Kelly, Secretary  
Department of Homeland Security  
Washington, DC 20528

Steven Mnuchin, Secretary  
Department of the Treasury  
1500 Pennsylvania Ave., NW  
Washington, DC 20220

Wilbur Ross, Secretary  
Department of Commerce  
1401 Constitution Ave., NW  
Washington, DC 20230

Kevin McAleenan, Acting Commissioner  
Customs and Border Protection  
Department of Homeland Security  
1300 Pennsylvania Ave., NW  
Washington, DC 20229

Sam Rauch  
Acting Assistant Administrator  
National Marine Fisheries Service  
National Oceanographic and Atmospheric  
Administration  
1315 East-West Highway  
Silver Spring, MD 20910

### Petitioners

Natural Resources Defense Council  
1314 2<sup>nd</sup> St.  
Santa Monica, CA 90401  
Tel: (310) 434-2300

Center for Biological Diversity  
2400 NW 80<sup>th</sup> St., #146  
Seattle, WA 98117  
Tel: (206) 327-2344

Animal Welfare Institute  
900 Pennsylvania Ave., SE  
Washington, DC 20003  
Tel: (202) 337-2332

The Natural Resources Defense Council (“NRDC”) is an international nonprofit environmental organization with more than 2 million members and online activists. Since 1970, our lawyers, scientists, and other environmental specialists have worked to protect the world’s natural resources, public health, and the environment. NRDC has offices in New York City, Washington, D.C., Los Angeles, San Francisco, Chicago, Bozeman, and Beijing. NRDC and its members are concerned with the conservation of marine mammals and the effective implementation of the Marine Mammal Protection Act. [www.nrdc.org](http://www.nrdc.org)

The Center for Biological Diversity (“the Center”) is a nonprofit conservation organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has more than 1.3 million members and online activists dedicated to the protection of endangered species and wild places. The Center and its members are concerned with the conservation of marine mammals and the effective implementation of the Marine Mammal Protection Act. [www.biologicaldiversity.org](http://www.biologicaldiversity.org)

The Animal Welfare Institute (“AWI”) is a non-profit charitable organization founded in 1951 and dedicated to reducing animal suffering caused by people. AWI engages policymakers, scientists, industry, and the public to achieve better treatment of animals everywhere — in the laboratory, on the farm, in commerce, at home, and in the wild. [www.awionline.org](http://www.awionline.org)

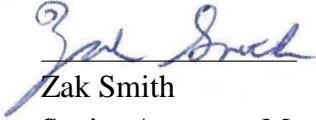
### **Action Requested**

NRDC, the Center, and AWI request the Secretaries of Homeland Security, the Treasury, and Commerce to carry out the non-discretionary duties imposed by section 101(a)(2) of the Marine Mammal Protection Act (“MMPA”), 16 U.S.C. § 1371(a)(2), to “ban the importation of commercial fish or products from fish” sourced using fishing activities that “result[ ] in the incidental kill or incidental serious injury” of vaquita “in excess of United States standards.” Contrary to the MMPA, the United States, through the actions and inactions of your agencies, allows the importation of fish and fish products from Mexico that kill and injure critically endangered vaquita in excess of United States standards. In addition, to the extent that Mexico has provided reasonable proof regarding the effects of its commercial fishing activities on vaquita, it is irrefutable that many of Mexico’s commercial fisheries exporting to the United States engage in activities that incidentally kill or seriously injure vaquita in excess of United States standards.

Therefore, petitioners request that the Secretaries immediately ban imports of all fish and fish products from Mexico that do not satisfy the MMPA section 102(a)(2) requirements as applied to the incidental killing or serious injury of vaquita. Further, emergency rulemaking banning such imports is necessary to avoid immediate, ongoing, and “unacceptable risks” to vaquita. **Please consider this letter a formal petition for such action pursuant to 5 U.S.C. § 553(e) and,**

**given the imminent extinction of the vaquita and emergency nature of this situation, we request that you provide a substantive response within 60 days.**

Dated: May 18, 2017

A handwritten signature in blue ink, appearing to read "Zak Smith".

Zak Smith

Senior Attorney, Marine Mammal Protection

Director, Wildlife Trade Initiative

Natural Resources Defense Council

1314 2<sup>nd</sup> Street

Santa Monica, CA 90401

[zsmith@nrdc.org](mailto:zsmith@nrdc.org)

## INTRODUCTION

The Natural Resources Defense Council, Center for Biological Diversity, and Animal Welfare Institute (“Petitioners”) request that the Department of Homeland Security, the Department of the Treasury, and the Department of Commerce carry out their non-discretionary duties under Section 101(a)(2) of the Marine Mammal Protection Act (“MMPA”), 16 U.S.C. § 1371(a)(2), to “ban the importation of commercial fish or products from fish” sourced in a manner that “results in the incidental kill or incidental serious injury” of vaquita “in excess of United States standards.” Specifically, we request that the relevant Secretary ban all fish and fish products originating from the vaquita’s range in the northern Gulf of California that were obtained using any kind of gillnet—the fishing gear solely responsible for the near extinction of the vaquita.

Bycatch poses the most significant threat to marine mammal species around the globe. Hundreds of thousands of dolphins, whales, sea lions, and other marine mammals are injured and killed each year in gillnets, longlines, and other fishing gear. For the vaquita, gillnet bycatch has driven the species from a population of more than 700 in 1990 to fewer than 30 vaquita remaining today, a decline of more than 95 percent in about 25 years. If current decline rates continue, the vaquita will be extinct in two years. In response, the Comité Internacional para la Recuperación de la Vaquita (CIRVA)—the preeminent body of vaquita experts—has repeatedly recommended “that the sale or possession of gillnets on land and at sea should be illegal” within the vaquita’s range and on adjacent lands.

Congress recognized the threat commercial-fisheries bycatch presents to marine mammal species like the vaquita when it passed the MMPA in 1972. The law tightly regulates and restricts fisheries-related mortalities of marine mammals and has led to the establishment of significant protective measures limiting harmful fishing practices and protecting marine mammal populations from fisheries bycatch in U.S. waters. Congress also recognized that, if the United States’ efforts to protect marine mammals from fisheries bycatch were to be successful, it would have to exert pressure on fisheries of other nations to adopt similarly protective measures.

Section 101 of the MMPA provides the vital international component of ensuring the safety and conservation of marine mammals outside U.S. waters. By requiring foreign nations to prove that their fishing does not kill or injure marine mammals in excess of U.S. standards before allowing those nations to export fish and fish products to the U.S., Section 101 of the MMPA ensures that the United States’ considerable economic power provides an incentive to conserve, rather than obliterate, marine mammal populations. It also serves to protect U.S. fishers from unfair competition by foreign fishers operating without appropriate restraints on fishing practices.

After considerable delay and following litigation, the Department of Commerce issued rules implementing MMPA Section 101’s import provisions in August 2016. While the regulations

adopt a legally-dubiously five-year exemption period during which commercial fish and fish product imports generally will not be subject to the law's clear dictate, the rule nonetheless contemplates "emergency rulemaking to ban imports of fish and fish products from an export or exempt fishery having or likely to have an immediate and significant adverse impact on a marine mammal stock." The status of the vaquita clearly constitutes such an emergency and the U.S. government must take immediate action to implement the MMPA's import provisions and ban all fish and fish product imports from Mexico sourced using fishing activities that kill or injure the vaquita in excess of U.S. standards.

## I. LEGAL FRAMEWORK

### A. The MMPA's Restriction on the Import of Commercial Fish or Fish Products

Section 101(a)(2) of the MMPA reads as follows:

The Secretary of the Treasury<sup>1</sup> shall ban the importation of commercial fish or products from fish which have been caught with commercial fishing technology which results in the incidental kill or incidental serious injury of ocean mammals in excess of United States standards. For purposes of applying the preceding sentence, the Secretary—

(A) shall insist on reasonable proof from the government of any nation from which fish or fish products will be exported to the United States of the effects on ocean mammals of the commercial fishing technology in use for such fish or fish products exported from such nation to the United States...<sup>2</sup>

Thus, the Secretaries of the Treasury, Homeland Security, and Commerce have a duty to ban imports of fish and fish products absent information demonstrating that the fish was caught in accordance with U.S. standards. Further, the MMPA places the burden on exporting countries to provide reasonable proof of compliance with U.S. standards. In short, the United States, through the relevant agencies, must demand, obtain, and deem adequate a country's demonstration that the effects of its fishing practices on marine

---

<sup>1</sup> While the MMPA assigns the duty to ban imports to "the Secretary of Treasury," in 2002, Congress transferred some of Treasury's authority to the Department of Homeland Security ("DHS") and thus DHS's sub-agency, Customs and Border Patrol ("CBP"). *See* 6 U.S.C. §§ 203; 212(a)(1), (2); *see also* 19 C.F.R. § 0.1, Appx. 1; 68 Fed. Reg. 28,322 (May 23, 2003) (Treasury Order 100-16, delegating all "Customs revenue functions" to the DHS, except retaining Treasury's "authority to approve any regulations concerning import quotas or trade bans," "marking," "record-keeping," and other "entry" requirements). Additionally, NMFS has clarified that duty to "insist on reasonable proof" is assigned to the Secretary of Commerce. 75 Fed. Reg. 22,731 (Apr. 30, 2010).

<sup>2</sup> 16 U.S.C. § 1371(a)(2).

mammals meet U.S. standards before allowing that country's fish products to enter the United States.<sup>3</sup>

For the vaquita, the situation that Congress sought to avoid—a situation in which U.S. consumer dollars have supported the decimation of the species by poorly regulated, destructive fisheries—has unfolded and must be stopped.

## B. Implementing the Import Provisions of the MMPA

In August 2016, the National Marine Fisheries Service (“NMFS”) finalized a rule implementing MMPA Section 101(a)(2)'s import provisions.<sup>4</sup> The rule establishes a process for determining whether a fish or fish product entering the U.S. must be banned for failing to meet U.S. standards for marine mammal protection.<sup>5</sup>

Specifically, the rule sets forth a process for evaluating countries' regulatory programs for addressing incidental and intentional mortality and serious injury of marine mammals in fisheries that export fish and fish products to the United States. Fish and fish products from such fisheries may only be imported into the U.S. if a country has applied for and received a “comparability finding” for the fisheries from NMFS. To receive a comparability finding, a country must meet two conditions. First, it must prohibit the intentional killing or serious injury of marine mammals in the course of commercial fishing operations and show that it has procedures to reliably certify that its fisheries comply with the prohibition.<sup>6</sup> Second, the country must maintain a regulatory program that is comparable in effectiveness to the U.S.'s regulatory program for reducing incidental mortality and serious injury of marine mammals in the course of commercial fishing operations.<sup>7</sup>

For Mexican fisheries operating in the northern Gulf of California that export products to the United States, NMFS will make a comparability finding by determining whether Mexico “maintains a regulatory program that provides for, or effectively achieves comparable results as, the following” elements corresponding to the U.S.'s regulatory program: (1) marine mammal stock assessments for those stocks interacting with the export fishery; (2) maintenance of a fishing registry that tracks number of vessels, effort areas and dates, gear type, and target

---

<sup>3</sup> Underscoring the seriousness of the ban, the MMPA makes the import of such products a criminal violation: “It is unlawful to import into the United States . . . any fish, whether fresh, frozen, or otherwise prepared, if such fish was caught in a manner which the Secretary has proscribed for persons subject to the jurisdiction of the United States, whether or not any marine mammals were in fact taken incident to the catching of the fish.” 16 U.S.C. § 1372(c)(3).

<sup>4</sup> See 81 Fed. Reg. 54390 (Aug. 15, 2016).

<sup>5</sup> While petitioners do not believe that NMFS's conception of “U.S. standards” adequately captures the full level of protections afforded marine mammals under U.S. law, any disagreement is irrelevant in the case of vaquita given the species' status.

<sup>6</sup> See 50 C.F.R. § 216.24(h)(6)(iii)(A).

<sup>7</sup> See 50 C.F.R. § 216.24(h)(6)(iii)(B).

species; (3) regulatory requirements on reporting marine mammal take and reducing the total incidental mortality and serious injury of a marine mammal stock below the U.S. bycatch limit; (4) implementation of a monitoring program to estimate incidental mortality and serious injury of marine mammals resulting from export fisheries; (5) the setting of bycatch limits for marine mammal populations harmed by export fisheries; and (6) an analysis of the harm from each export fishery in relation to the bycatch limit and other export fisheries.<sup>8</sup>

As noted above, the rule also establishes a five-year phase-in period—NMFS’s “one-time exemption period”—to allow countries to develop and refine the necessary regulatory programs for obtaining a comparability finding.<sup>9</sup> However, acknowledging that some marine mammal populations may need immediate relief from exporters’ non-compliance with the MMPA’s import provisions, the final rule recognizes that NMFS may conduct “emergency rulemaking.”<sup>10</sup> According to NMFS, such action allows “for timely treatment of cases where the usual process and timeframe could result in unacceptable risks to the affected marine mammal stock or species.”<sup>11</sup> NMFS identifies one category of “unacceptable ecological risk” as a “very small population[] where any incidental mortality could result in increased risk of extinction.”<sup>12</sup>

## II. VAQUITA

### A. Vaquita Status

NMFS’s description of unacceptable ecological risk is tailor-made for the vaquita, a porpoise species with fewer than 30 individuals remaining that suffers an ever-higher risk of extinction with each mortality.

The status of the vaquita is well known to NMFS, as its officials have been members of CIRVA since its inception in 1997. CIRVA met in 1997, 1999, 2004, 2012, 2014, 2015, twice in 2016, and once to date in 2017.<sup>13</sup> Reports from CIRVA document a dramatic vaquita decline of more than 95 percent over the last two decades. The following figure (Figure 1), from the report of the fifth meeting of CIRVA in 2014, shows a decline rate that reached 18.5 percent per year in 2014.

---

<sup>8</sup> See 50 C.F.R. § 216.24(h)(6)(iii)(C).

<sup>9</sup> See 50 C.F.R. § 216.24(h)(2)(ii). While Petitioners believe that NMFS lacks the authority to exempt nations from the MMPA’s clear statutory directive because Section 101(a)(2) of the MMPA includes no exceptions and provides for no delay, Petitioners believe that any disagreement is irrelevant given the status of vaquita, which compels immediate action.

<sup>10</sup> See 81 Fed. Reg. 54390, 54395 (Aug. 15, 2016).

<sup>11</sup> 81 Fed. Reg. at 54395.

<sup>12</sup> *Id.*

<sup>13</sup> CIRVA reports can be found at [www.BoycottMexicanShrimp.com](http://www.BoycottMexicanShrimp.com).



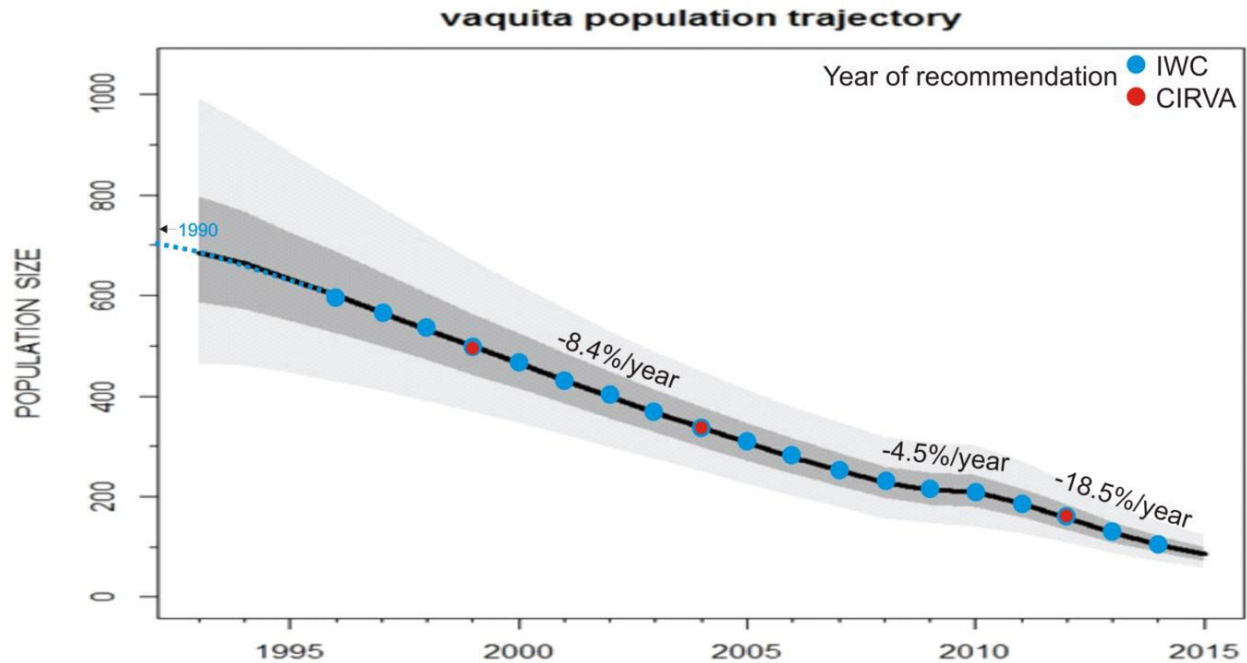


Figure 1. Vaquita Population Trajectory from CIRVA-5, July 2014.

In the report from its eighth meeting, CIRVA estimated an “average annual rate of decline between 2011 and 2016” of “39%, corresponding to a population decline of 90% over this five-year period.”<sup>14</sup> As of 2015, the annual decline rate had reached approximately 50 percent.<sup>15</sup> At this rate, the vaquita will be functionally extinct by 2019, just two years from now.

Vaquita decline is attributable to one factor: bycatch in gillnets. Over time, numerous Mexican fisheries have played a role in vaquita bycatch (*e.g.*, totoaba, shrimp, sharks, rays, sierra, and chano)<sup>16</sup> but they all have one thing in common, the use of gillnets.<sup>17</sup> In response, CIRVA has noted on numerous occasions that the use of gillnets by *any* fishery in the vaquita’s range is incompatible with the survival of the species.<sup>18</sup>

<sup>14</sup> Report of the Eighth Meeting of CIRVA, November 2016, p. 3.

<sup>15</sup> *Id.*

<sup>16</sup> See Report of the First Meeting of CIRVA, January 1997, p. 1-12, 1-13; Vidal, O. 1995. Population biology and incidental mortality of the vaquita, *Phocoena sinus*. Report of the International Whaling Commission (Special Issue 16):247-272.

<sup>17</sup> See Report of the Fifth Meeting of CIRVA, July 2014; Barlow, J., Rojas-Bracho, L., Munoz-Pina, C., and S. Mesnick. 2010. Conservation of the vaquita (*Phocoena sinus*) in the Northern Gulf of California, Mexico. Handbook of marine fisheries conservation and management, 205-214; Vidal, O. 1995. Population biology and incidental mortality of the vaquita, *Phocoena sinus*. Report of the International Whaling Commission (Special Issue 16):247-272.

<sup>18</sup> Report of the Eighth Meeting of CIRVA, November 2016, p. 4 (“CIRVA repeats its previous recommendation that the Government of Mexico implement a permanent ban on *all* gillnets throughout the entire range of the vaquita.”) (emphasis added).

## B. Gillnet-Using Fisheries in the Upper Gulf Do Not Meet U.S. Standards and Emergency Rulemaking Is Necessary to Immediately Ban Imports

Any fishery using gillnets in or adjacent to the vaquita's range operates in a manner that is incompatible with U.S. standards for marine mammal protection. As discussed in NMFS's rulemaking for the MMPA's import provisions, U.S. standards include a bycatch limit. In the United States, NMFS determines a fisheries bycatch limit by calculating the "potential biological removal" ("PBR"), which is the "maximum number of animals...that may be removed...while allowing that stock to reach or maintain its optimum sustainable population."<sup>19</sup> If NMFS calculated a PBR for vaquita, it would be essentially zero.<sup>20</sup> In comparison, the vaquita experienced a population decline of nearly 50 percent between 2015 and 2016, with only approximately 30 vaquita remaining as of November 2016.<sup>21</sup> With gillnet bycatch the sole driver of vaquita decline, gillnet fisheries in and adjacent to their range are producing a mortality rate well in excess of PBR.<sup>22</sup>

In the United States, a similarly situated stock would be designated a "strategic stock" and a take reduction team would be formed to develop a take reduction plan to ensure that vaquita serious injury/mortality does not exceed PBR (*i.e.*, zero).<sup>23</sup> While not a U.S. stock, the vaquita has the functional equivalent of such a team (CIRVA) and such a plan (CIRVA recommendations). While there are several elements of CIRVA's recovery plan, relevant here is the fact that CIRVA has continually identified gillnet-free habitat as a necessary precondition to vaquita survival and recovery, calling for the complete and total elimination of all gillnets in and adjacent to the vaquita's range and the ban of gillnets in every fishery operating in and adjacent to the vaquita's range.

---

<sup>19</sup> 16 U.S.C. § 1362(20).

<sup>20</sup> More specifically, assuming a current, minimum vaquita population of 30 animals (likely an overestimate), a productivity rate of 0.04 (the growth rate commonly assigned to porpoises, although the productivity rate for vaquita is expected to be lower than 0.04, *see* Rojas-Bracho et al. (2006)), and a recovery factor of 0.1 (the default value for endangered stocks), the *maximum possible* PBR would be 0.06 animals per year.

$$\text{Min pop of vaquita [30]} \times \text{Half max productivity rate [0.5} \times 0.04] \times \text{Recovery factor [0.1]} = 0.06.$$

At this rate, only *one* vaquita could be killed roughly *every 17 years*. *See* Rojas-Bracho, L., Reeves, R.R., & Jaramillo-Legorreta, A. 2006. Conservation of the vaquita *Phocoena sinus*. *Mammal Rev.* 36:179-216. Note that the minimum population estimate (30) is conservative as it technically should be the 20th percentile of a log-normal distribution of the population abundance estimate, which would result in a lower minimum population estimate and, consequently, a lower PBR.

<sup>21</sup> Report of the Eighth Meeting of CIRVA, November 2016, p. 3.

<sup>22</sup> Note that eight vaquita have been found dead since the beginning of 2016.

[https://www.nytimes.com/2017/04/27/world/americas/only-captivity-will-save-the-vaquita-experts-say.html?\\_r=0](https://www.nytimes.com/2017/04/27/world/americas/only-captivity-will-save-the-vaquita-experts-say.html?_r=0).

<sup>23</sup> 16 U.S.C. § 1387(f); the vaquita's status under the Endangered Species Act (*i.e.*, Endangered) would also trigger the creation of a take reduction team and a take reduction plan.

In addition to triggering the MMPA’s more general ban on the import of fish products from fisheries violating U.S. marine mammal protection standards, gillnet fisheries in the vaquita’s range also trigger NMFS’s and the MMPA’s emergency rulemaking standards. As noted above, NMFS has authority to issue emergency rulemaking for any export fishery “having or likely to have an immediate and significant adverse impact on a marine mammal stock.”<sup>24</sup> Upper Gulf of California (“UGC”) gillnet fisheries are no doubt having an immediate and significant adverse impact on vaquita, as the fisheries present an “unacceptable ecological risk” to a “very small population[] where any incidental mortality could result in increased risk of extinction.”<sup>25</sup> Further, in a letter submitted to NMFS’s Office of International Affairs on 1 March 2017, the United States Marine Mammal Commission (“MMC”) specifically recommended “that NMFS consider emergency rulemaking to make a finding that” UGC gillnet fisheries “do not meet the standards applicable under section 101(a)(2) of the MMPA.” MMC explained that, “[t]he gillnet fisheries of the [UGC] continue to cause high levels of bycatch mortality for the vaquita” and that there is “sufficient information to indicate that all gillnet fisheries that incidentally catch vaquitas are employing a fishing technology that kills or seriously injures marine mammals in excess of U.S. standards.”<sup>26</sup>

The MMPA specifically requires that NMFS “shall . . . respond[ ] to” “[a]ny recommendations made by the Commission” within 120 days of receiving such a recommendation. If MMC’s recommendation is not adopted, NMFS must provide a “detailed explanation” why not.<sup>27</sup>

In light of the above, any fishery using gillnets in the UGC does not meet U.S. standards under the MMPA. On information and belief, the following fisheries operating in the UGC utilize gillnets and, thus, violate U.S. standards:

- Bat Ray (*Myliobatis californicus*)
- Bigeye croaker (*Micropogonias megalops*)
- Blue Shrimp (*Litopenaeus stylirostris*)
- Brown Smoothhound (*Mustelus henlei*)
- California Butterfly Ray (*Gymnura marmorata*)
- California flounder (*Paralichthys californicus*)
- Cortez Halibut (*Paralichthys aestuarius*)
- Corvinas (*Cynoscion parvipinnis*, *C. xanthulus*, *C. reticulatus*)
- Diamond Stingray/Manta Raya (*Hypanus dipterurus*)
- Finescale Triggerfish (*Balistes polylepis*)
- Flathead Mullet (*Mugil cephalus*)

---

<sup>24</sup> See 81 Fed. Reg. 54390, 54395 (Aug. 15, 2016).

<sup>25</sup> *Id.*

<sup>26</sup> <https://www.mmc.gov/wp-content/uploads/17-03-01-Young-Fisheries-Bycatch.pdf>

<sup>27</sup> 16 U.S.C. 1402(d).

- Goldspotted sand bass (*Paralabrax auroguttatus*)
- Gray Smooth-hound (*Mustelus californicus*)
- Guitarfish (*Pseudobatos productus*)
- Gulf Coney (*Hyporthodus acanthistius*)
- Gulf corvina (*Cynoscion othonopterus*)
- Gulf Grouper (*Mycteroperca jordani*)
- Jack
- King croaker (*Genyonemus lineatus*)
- Longnose Eagle Ray (*Myliobatis longirostris*)
- Mexican barred snapper (*Hoplopagrus guentherii*)
- Monterey Spanish mackerel/Gulf Sierra (*Scomberomorus concolor*)
- Northern Red Snapper/huachinango del Golfo (*Lutjanus campechanus*)
- Octopus
- Pacific Angel Shark (*Squatina californica*)
- Pacific Butterfish/Pacific Pompano (*Peprilus simillimus*)
- Pacific Sharpnose Shark (*Rhizoprionodon longurio*)
- Pacific Sierra (*Scomberomorus sierra*)
- Sicklefins Smoothhound (*Mustelus lunulatus*)
- White Mullet (*Mugil curema*)
- White weakfish/White seabass (*Atractoscion nobilis*)
- other shrimp, other sharks, other corvina<sup>28</sup>

The above list is not complete. There are additional fisheries operating in the UGC and if any of them utilize gillnets, they are not meeting U.S. standards.

### C. Imports of Vaquita-Harmful Fish and Fish Products from Mexico

Any fish or fish product from the fisheries identified above, or any fish or fish product from any other gillnet-using fishery operating in the UGC, does not meet U.S. standards. Over the last five years, the United States has imported the type of fish and fish products produced by these fisheries.<sup>29</sup> Pursuant to the MMPA, imports of fish and fish products from these fisheries must be banned.

---

<sup>28</sup> See, e.g., Erisman, B. et al. 2015. A comparison of fishing activities between two coastal communities within a biosphere reserve in the Upper Gulf of California. *Fisheries Research* 164:254-265.

<sup>29</sup> See Appendix I.

### III. THE UNITED STATES MUST IMMEDIATELY BAN THE IMPORT OF ALL FISH AND FISH PRODUCTS CAUGHT USING GILNET GEAR WITHIN OR ADJACENT TO THE VAQUITA'S RANGE.

When Congress passed the MMPA, it realized that marine mammal conservation could not be accomplished through regulation of U.S. fisheries alone. MMPA section 101(a)(2) therefore mandates the use of the United States' considerable trade power to achieve conservation of marine mammals outside U.S. waters. This provision is meant to provide a strong incentive for foreign fisheries to protect marine mammals from dangerous fishing activities. Unfortunately, over the past decades the U.S. government has been promoting the exact opposite result for vaquita by allowing imports of shrimp, corvina, and other fish and fish products from fisheries engaging in activities that have driven the vaquita to near-extinction.

The Secretaries' failure to enforce MMPA section 101(a)(2) as it applies to vaquita harms U.S. interests in trade and conservation. Petitioners therefore urge the Secretary of Homeland Security, the Secretary of the Treasury, and the Secretary of Commerce to immediately ban the import of all fish and fish products from Mexico that contribute to the killing or serious injury of vaquita in violation of U.S. standards.

We look forward to receiving your responses within 60 days of receiving this petition.

## Appendix I of Petition to Ban Imports of Fish and Fish Products from Mexico

## National Marine Fisheries Service Fisheries Statistics and Economics Division

**You asked for the following**

Trade Type:               IMPORTS  
 From:                       2012  
 Through:                  2017  
 Product:                  FISH NSPF  
 Countries:                MEXICO

*Note: If a month is not listed, then we do not have data for that month. Current data through March, 2017.*

Country	Product Name	Kilos	Dollars
<b>2012</b>			
MEXICO	FISH NSPF DRIED	1,245	41,640
MEXICO	FISH NSPF FILLET BLOCKS FROZEN > 4.5KG	142,968	1,392,355
MEXICO	FISH NSPF FRESH SCALED NOT >6.8KG	1,406	6,216
MEXICO	FISH NSPF HEADS, TAILS, MAWS DRIED/SALTED/BRINE/SMOKED	53,351	78,849
MEXICO	FISH NSPF LIVER OIL/FRACTIONS	986	8,604
MEXICO	FISH NSPF OIL/FRACTIONS	3,219,132	4,423,280
MEXICO	FISH NSPF SMOKED	48,963	725,067
<b>Grand Total: 2012</b>		<b>3,468,051</b>	<b>6,676,011</b>
<b>2013</b>			
MEXICO	FISH NSPF DRIED	5,366	58,332
MEXICO	FISH NSPF FILLET BLOCKS FROZEN > 4.5KG	88,154	866,702
MEXICO	FISH NSPF HEADS, TAILS, MAWS DRIED/SALTED/BRINE/SMOKED	18,627	14,343
MEXICO	FISH NSPF LIVER, ROE FROZEN	3,570	4,463
MEXICO	FISH NSPF LIVER, ROE, MILT CURED	748	4,125
MEXICO	FISH NSPF OIL/FRACTIONS	3,195,135	4,644,357
MEXICO	FISH NSPF OTHER EDIBLE OFFAL	17,791	13,700
MEXICO	FISH NSPF SMOKED	23,482	347,126
<b>Grand Total: 2013</b>		<b>3,352,873</b>	<b>5,953,148</b>
<b>2014</b>			
MEXICO	FISH NSPF FILLET BLOCKS FROZEN > 4.5KG	73,459	320,780
MEXICO	FISH NSPF HEADS, TAILS, MAWS DRIED/SALTED/BRINE/SMOKED	9,989	15,570
MEXICO	FISH NSPF LIVER, ROE FROZEN	4,539	23,723
MEXICO	FISH NSPF OIL/FRACTIONS	1,028,975	1,791,544
MEXICO	FISH NSPF OTHER EDIBLE OFFAL	17,550	21,236
MEXICO	FISH NSPF SMOKED	20,601	163,599

<b>Grand Total: 2014</b>		<b>1,155,113</b>	<b>2,336,452</b>
<b>2015</b>			
MEXICO	FISH NSPF DRIED	450	7,276
MEXICO	FISH NSPF FERTILIZED EGGS	3,492	12,981
MEXICO	FISH NSPF FILLET BLOCKS FROZEN > 4.5KG	76,787	606,902
MEXICO	FISH NSPF FILLET DRIED/SALTED/BRINE	272	2,352
MEXICO	FISH NSPF HEADS,TAILS,MAWS DRIED/SALTED/BRINE/SMOKED	9,490	22,881
MEXICO	FISH NSPF LIVER,ROE FROZEN	9,759	20,090
MEXICO	FISH NSPF LIVER,ROE, MILT CURED	492	3,936
MEXICO	FISH NSPF OIL/FRACTIONS	709,787	1,147,516
MEXICO	FISH NSPF SMOKED	7,620	83,832
<b>Grand Total: 2015</b>		<b>818,149</b>	<b>1,907,766</b>
<b>2016</b>			
MEXICO	FISH NSPF DRIED	3,865	11,220
MEXICO	FISH NSPF FERTILIZED EGGS	26,420	97,774
MEXICO	FISH NSPF FILLET BLOCKS FROZEN > 4.5KG	79,454	721,832
MEXICO	FISH NSPF FRESH SCALED NOT >6.8KG	636	2,146
MEXICO	FISH NSPF HEADS,TAILS,MAWS DRIED/SALTED/BRINE/SMOKED	4,067	56,293
MEXICO	FISH NSPF OIL/FRACTIONS	574,462	937,049
<b>Grand Total: 2016</b>		<b>688,904</b>	<b>1,826,314</b>
<b>2017</b>			
MEXICO	FISH NSPF FERTILIZED EGGS	4,755	16,299
MEXICO	FISH NSPF FILLET BLOCKS FROZEN > 4.5KG	60,413	384,793
MEXICO	FISH NSPF HEADS,TAILS,MAWS DRIED/SALTED/BRINE/SMOKED	586	4,515
MEXICO	FISH NSPF LIVER,ROE, MILT FROZEN	2,913	20,391
MEXICO	FISH NSPF OIL/FRACTIONS	72,414	123,725
<b>Grand Total: 2017</b>		<b>141,081</b>	<b>549,723</b>

## National Marine Fisheries Service Fisheries Statistics and Economics Division

### You asked for the following

Trade Type:               IMPORTS  
 From:                       2012  
 Through:                  2017  
 Product:                  MARINE FISH NSPF  
 Countries:                MEXICO

*Note: If a month is not listed, then we do not have data for that month. Current data through March, 2017.*

Country	Product Name	Kilos	Dollars
<b>2012</b>			
MEXICO	MARINE FISH NSPF FILLET FRESH	1,142,541	16,738,891
MEXICO	MARINE FISH NSPF FILLET FROZEN	1,199,992	14,858,291
MEXICO	MARINE FISH NSPF FRESH	2,732,393	9,797,864
MEXICO	MARINE FISH NSPF FROZEN	2,456,613	4,976,764
MEXICO	MARINE FISH NSPF MEAT FRESH	350,341	4,782,742
MEXICO	MARINE FISH NSPF MEAT FROZEN > 6.8KG	36,073	249,659
MEXICO	MARINE FISH NSPF MEAT FROZEN NOT > 6.8 KG	50,126	214,111
<b>Grand Total: 2012</b>		<b>7,968,079</b>	<b>51,618,322</b>
<b>2013</b>			
MEXICO	MARINE FISH NSPF FILLET FRESH	1,463,512	22,065,734
MEXICO	MARINE FISH NSPF FILLET FROZEN	945,812	10,508,789
MEXICO	MARINE FISH NSPF FRESH	3,021,719	11,788,427
MEXICO	MARINE FISH NSPF FROZEN	3,543,898	6,570,178
MEXICO	MARINE FISH NSPF MEAT FRESH	115,887	1,600,204
MEXICO	MARINE FISH NSPF MEAT FROZEN > 6.8KG	93,473	185,814
MEXICO	MARINE FISH NSPF MEAT FROZEN NOT > 6.8 KG	24,279	75,212
<b>Grand Total: 2013</b>		<b>9,208,580</b>	<b>52,794,358</b>
<b>2014</b>			
MEXICO	MARINE FISH NSPF FILLET FRESH	1,487,851	24,988,971
MEXICO	MARINE FISH NSPF FILLET FROZEN	684,336	7,521,702
MEXICO	MARINE FISH NSPF FRESH	3,039,990	13,406,145
MEXICO	MARINE FISH NSPF FROZEN	4,397,454	7,418,452
MEXICO	MARINE FISH NSPF MEAT FRESH	116,240	1,499,560
MEXICO	MARINE FISH NSPF MEAT FROZEN > 6.8KG	17,601	37,755
MEXICO	MARINE FISH NSPF MEAT FROZEN NOT > 6.8 KG	70,295	211,296



<b>Grand Total: 2014</b>		<b>9,813,767</b>	<b>55,083,881</b>
<b>2015</b>			
MEXICO	MARINE FISH NSPF FILLET FRESH	1,420,874	25,116,044
MEXICO	MARINE FISH NSPF FILLET FROZEN	1,730,550	21,534,912
MEXICO	MARINE FISH NSPF FRESH	3,232,494	15,500,055
MEXICO	MARINE FISH NSPF FROZEN	3,282,988	6,455,193
MEXICO	MARINE FISH NSPF MEAT FRESH	75,180	1,156,481
MEXICO	MARINE FISH NSPF MEAT FROZEN > 6.8KG	7,402	14,547
MEXICO	MARINE FISH NSPF MEAT FROZEN NOT > 6.8 KG	104,556	780,103
<b>Grand Total: 2015</b>		<b>9,854,044</b>	<b>70,557,335</b>
<b>2016</b>			
MEXICO	MARINE FISH NSPF FILLET FRESH	1,410,016	23,024,316
MEXICO	MARINE FISH NSPF FILLET FROZEN	1,633,370	19,521,434
MEXICO	MARINE FISH NSPF FRESH	3,753,292	17,863,449
MEXICO	MARINE FISH NSPF FROZEN	4,760,315	8,714,024
MEXICO	MARINE FISH NSPF MEAT FRESH	49,489	768,002
MEXICO	MARINE FISH NSPF MEAT FROZEN > 6.8KG	4,027	12,771
MEXICO	MARINE FISH NSPF MEAT FROZEN NOT > 6.8 KG	86,712	211,046
<b>Grand Total: 2016</b>		<b>11,697,221</b>	<b>70,115,042</b>
<b>2017</b>			
MEXICO	MARINE FISH NSPF FILLET FRESH	126,674	1,763,767
MEXICO	MARINE FISH NSPF FILLET FROZEN	483,858	6,135,555
MEXICO	MARINE FISH NSPF FRESH	1,124,484	5,083,599
MEXICO	MARINE FISH NSPF FROZEN	1,485,205	3,304,943
MEXICO	MARINE FISH NSPF MEAT FRESH	140,320	2,283,129
MEXICO	MARINE FISH NSPF MEAT FROZEN NOT > 6.8 KG	93,583	117,235
<b>Grand Total: 2017</b>		<b>3,454,124</b>	<b>18,688,228</b>

## National Marine Fisheries Service Fisheries Statistics and Economics Division

**You asked for the following**

Trade Type:               IMPORTS  
 From:                       2012  
 Through:                  2017  
 Product:                  BASS  
 Countries:                MEXICO

*Note: If a month is not listed, then we do not have data for that month. Current data through March, 2017.*

Country	Product Name	Kilos	Dollars
<b>No Data For 2012</b>			
<b>No Data For 2013</b>			
<b>No Data For 2014</b>			
<b>No Data For 2015</b>			
<b>No Data For 2016</b>			
<b>2017</b>			
MEXICO	BASS FRESH	16,122	116,463
<b>Grand Total: 2017</b>		<b>16,122</b>	<b>116,463</b>

## National Marine Fisheries Service Fisheries Statistics and Economics Division

### You asked for the following

Trade Type:                   IMPORTS  
 From:                         2012  
 Through:                    2017  
 Product:                    FLATFISH FLOUNDER  
 Countries:                  MEXICO

*Note: If a month is not listed, then we do not have data for that month. Current data through March, 2017.*

Country	Product Name	Kilos	Dollars
<b>2012</b>			
MEXICO	FLATFISH FLOUNDER FILLET BLOCKS FROZEN > 4.5KG	690	5,122
MEXICO	FLATFISH FLOUNDER FILLET FRESH	4,383	44,943
MEXICO	FLATFISH FLOUNDER FILLET FROZEN	16,661	113,888
MEXICO	FLATFISH FLOUNDER FRESH	61,142	166,491
MEXICO	FLATFISH FLOUNDER FROZEN	4,298	31,540
<b>Grand Total: 2012</b>		<b>87,174</b>	<b>361,984</b>
<b>2013</b>			
MEXICO	FLATFISH FLOUNDER FILLET BLOCKS FROZEN > 4.5KG	10,215	91,871
MEXICO	FLATFISH FLOUNDER FILLET FROZEN	16,391	157,510
MEXICO	FLATFISH FLOUNDER FRESH	149,852	603,286
MEXICO	FLATFISH FLOUNDER FROZEN	909	2,482
<b>Grand Total: 2013</b>		<b>177,367</b>	<b>855,149</b>
<b>2014</b>			
MEXICO	FLATFISH FLOUNDER FILLET FROZEN	45,407	391,566
MEXICO	FLATFISH FLOUNDER FRESH	291,881	1,950,475
<b>Grand Total: 2014</b>		<b>337,288</b>	<b>2,342,041</b>
<b>2015</b>			
MEXICO	FLATFISH FLOUNDER FILLET FROZEN	2,302	19,282
MEXICO	FLATFISH FLOUNDER FRESH	267,344	1,700,825
<b>Grand Total: 2015</b>		<b>269,646</b>	<b>1,720,107</b>
<b>2016</b>			
MEXICO	FLATFISH FLOUNDER FILLET FRESH	934	4,570
MEXICO	FLATFISH FLOUNDER FILLET FROZEN	3,654	16,253
MEXICO	FLATFISH FLOUNDER FRESH	204,581	1,043,109
<b>Grand Total: 2016</b>		<b>209,169</b>	<b>1,063,932</b>

2017			
MEXICO	FLATFISH FLOUNDER FRESH	113,046	504,116
<b>Grand Total: 2017</b>		<b>113,046</b>	<b>504,116</b>

## National Marine Fisheries Service Fisheries Statistics and Economics Division

**You asked for the following**

Trade Type:           IMPORTS  
 From:                 2012  
 Through:             2017  
 Product:             GROUPER  
 Countries:           MEXICO

*Note: If a month is not listed, then we do not have data for that month. Current data through March, 2017.*

Country	Product Name	Kilos	Dollars
<b>2012</b>			
MEXICO	GROUPER FRESH	3,414,706	25,310,501
MEXICO	GROUPER FROZEN	311,093	1,092,860
<b>Grand Total: 2012</b>		<b>3,725,799</b>	<b>26,403,361</b>
<b>2013</b>			
MEXICO	GROUPER FRESH	3,954,301	31,669,483
MEXICO	GROUPER FROZEN	412,251	2,268,765
<b>Grand Total: 2013</b>		<b>4,366,552</b>	<b>33,938,248</b>
<b>2014</b>			
MEXICO	GROUPER FRESH	2,900,420	26,733,924
MEXICO	GROUPER FROZEN	394,287	2,244,268
<b>Grand Total: 2014</b>		<b>3,294,707</b>	<b>28,978,192</b>
<b>2015</b>			
MEXICO	GROUPER FRESH	3,120,484	29,472,989
MEXICO	GROUPER FROZEN	300,987	1,972,639
<b>Grand Total: 2015</b>		<b>3,421,471</b>	<b>31,445,628</b>
<b>2016</b>			
MEXICO	GROUPER FRESH	3,426,913	31,445,743
MEXICO	GROUPER FROZEN	90,915	420,056
<b>Grand Total: 2016</b>		<b>3,517,828</b>	<b>31,865,799</b>
<b>2017</b>			
MEXICO	GROUPER FRESH	638,619	5,540,689
MEXICO	GROUPER FROZEN	152,087	290,749
<b>Grand Total: 2017</b>		<b>790,706</b>	<b>5,831,438</b>

## National Marine Fisheries Service Fisheries Statistics and Economics Division

**You asked for the following**

Trade Type:               IMPORTS  
 From:                     2012  
 Through:                2017  
 Product:                 FLATFISH HALIBUT  
 Countries:              MEXICO

*Note: If a month is not listed, then we do not have data for that month. Current data through March, 2017.*

Country	Product Name	Kilos	Dollars
<b>2012</b>			
MEXICO	FLATFISH HALIBUT ATLANTIC FRESH	920	2,042
MEXICO	FLATFISH HALIBUT NSPF FILLET FROZEN	155,654	1,198,621
MEXICO	FLATFISH HALIBUT PACIFIC FRESH	569,200	1,968,286
MEXICO	FLATFISH HALIBUT PACIFIC FROZEN	2,571	28,685
<b>Grand Total: 2012</b>		<b>728,345</b>	<b>3,197,634</b>
<b>2013</b>			
MEXICO	FLATFISH HALIBUT NSPF FILLET BLOCKS FROZEN > 4.5KG	2,641	19,021
MEXICO	FLATFISH HALIBUT NSPF FILLET FROZEN	107,577	798,683
MEXICO	FLATFISH HALIBUT PACIFIC FRESH	452,989	2,094,604
<b>Grand Total: 2013</b>		<b>563,207</b>	<b>2,912,308</b>
<b>2014</b>			
MEXICO	FLATFISH HALIBUT ATLANTIC FRESH	510	3,747
MEXICO	FLATFISH HALIBUT NSPF FILLET BLOCKS FROZEN > 4.5KG	9,653	73,201
MEXICO	FLATFISH HALIBUT NSPF FILLET FROZEN	12,247	122,656
MEXICO	FLATFISH HALIBUT PACIFIC FRESH	383,320	2,082,141
<b>Grand Total: 2014</b>		<b>405,730</b>	<b>2,281,745</b>
<b>2015</b>			
MEXICO	FLATFISH HALIBUT NSPF FILLET BLOCKS FROZEN > 4.5KG	13,000	56,730
MEXICO	FLATFISH HALIBUT NSPF FILLET FROZEN	15,262	167,005
MEXICO	FLATFISH HALIBUT PACIFIC FRESH	435,246	2,392,130
<b>Grand Total: 2015</b>		<b>463,508</b>	<b>2,615,865</b>
<b>2016</b>			
MEXICO	FLATFISH HALIBUT NSPF FILLET BLOCKS FROZEN > 4.5KG	1,482	15,169
MEXICO	FLATFISH HALIBUT NSPF FILLET FROZEN	21,240	229,686
MEXICO	FLATFISH HALIBUT PACIFIC FRESH	461,633	2,485,369

<b>Grand Total: 2016</b>		<b>484,355</b>	<b>2,730,224</b>
<b>2017</b>			
MEXICO	FLATFISH HALIBUT NSPF FILLET FROZEN	1,491	20,724
MEXICO	FLATFISH HALIBUT PACIFIC FRESH	62,824	458,512
<b>Grand Total: 2017</b>		<b>64,315</b>	<b>479,236</b>

## National Marine Fisheries Service Fisheries Statistics and Economics Division

### You asked for the following

Trade Type: IMPORTS  
 From: 2012  
 Through: 2017  
 Product: JACK,HORSE MACKEREL  
 Countries: MEXICO

*Note: If a month is not listed, then we do not have data for that month. Current data through March, 2017.*

Country	Product Name	Kilos	Dollars
<b>2012</b>			
MEXICO	JACK,HORSE MACKEREL FRESH	26,965	105,508
MEXICO	JACK,HORSE MACKEREL FROZEN	9,037	21,994
<b>Grand Total: 2012</b>		<b>36,002</b>	<b>127,502</b>
<b>2013</b>			
MEXICO	JACK,HORSE MACKEREL FRESH	7,046	53,300
MEXICO	JACK,HORSE MACKEREL FROZEN	62,737	110,130
<b>Grand Total: 2013</b>		<b>69,783</b>	<b>163,430</b>
<b>2014</b>			
MEXICO	JACK,HORSE MACKEREL FRESH	11,119	80,333
MEXICO	JACK,HORSE MACKEREL FRESH NOT > 6.8KG	13,614	53,798
MEXICO	JACK,HORSE MACKEREL FROZEN	8,877	4,586
<b>Grand Total: 2014</b>		<b>33,610</b>	<b>138,717</b>
<b>2015</b>			
MEXICO	JACK,HORSE MACKEREL FRESH	13,458	63,459
MEXICO	JACK,HORSE MACKEREL FROZEN	49,288	79,538
<b>Grand Total: 2015</b>		<b>62,746</b>	<b>142,997</b>
<b>2016</b>			
MEXICO	JACK,HORSE MACKEREL FRESH	9,613	65,421
MEXICO	JACK,HORSE MACKEREL FRESH NOT > 6.8KG	19,068	36,616
MEXICO	JACK,HORSE MACKEREL FROZEN	46,945	70,882
<b>Grand Total: 2016</b>		<b>75,626</b>	<b>172,919</b>
<b>2017</b>			
MEXICO	JACK,HORSE MACKEREL FRESH	1,928	25,791
MEXICO	JACK,HORSE MACKEREL FROZEN	2,730	5,914
<b>Grand Total: 2017</b>		<b>4,658</b>	<b>31,705</b>



## National Marine Fisheries Service Fisheries Statistics and Economics Division

**You asked for the following**

Trade Type:               IMPORTS  
 From:                       2012  
 Through:                  2017  
 Product:                  MULLET  
 Countries:                MEXICO

*Note: If a month is not listed, then we do not have data for that month. Current data through March, 2017.*

Country	Product Name	Kilos	Dollars
<b>2012</b>			
MEXICO	MULLET FROZEN	8,925	24,402
<b>Grand Total: 2012</b>		<b>8,925</b>	<b>24,402</b>
<b>No Data For 2013</b>			
<b>2014</b>			
MEXICO	MULLET ROE FROZEN	18,641	74,944
<b>Grand Total: 2014</b>		<b>18,641</b>	<b>74,944</b>
<b>No Data For 2015</b>			
<b>No Data For 2016</b>			
<b>No Data For 2017</b>			

## National Marine Fisheries Service Fisheries Statistics and Economics Division

**You asked for the following**

Trade Type:               IMPORTS  
 From:                     2012  
 Through:                 2017  
 Product:                 OCTOPUS  
 Countries:                MEXICO

*Note: If a month is not listed, then we do not have data for that month. Current data through March, 2017.*

Country	Product Name	Kilos	Dollars
<b>2012</b>			
MEXICO	OCTOPUS FROZEN/DRIED/SALTED/BRINE	618,463	4,119,733
MEXICO	OCTOPUS LIVE/FRESH	57,744	274,482
MEXICO	OCTOPUS NSPF PREPARED/PRESERVED	13,120	42,092
<b>Grand Total: 2012</b>		<b>689,327</b>	<b>4,436,307</b>
<b>2013</b>			
MEXICO	OCTOPUS FROZEN/DRIED/SALTED/BRINE	667,724	3,294,966
MEXICO	OCTOPUS LIVE/FRESH	860	15,304
MEXICO	OCTOPUS NSPF PREPARED/PRESERVED	659	7,231
<b>Grand Total: 2013</b>		<b>669,243</b>	<b>3,317,501</b>
<b>2014</b>			
MEXICO	OCTOPUS FROZEN/DRIED/SALTED/BRINE	683,737	4,239,245
MEXICO	OCTOPUS LIVE/FRESH	4,213	44,092
<b>Grand Total: 2014</b>		<b>687,950</b>	<b>4,283,337</b>
<b>2015</b>			
MEXICO	OCTOPUS FROZEN/DRIED/SALTED/BRINE	1,244,536	6,484,655
MEXICO	OCTOPUS LIVE/FRESH	29,595	186,954
<b>Grand Total: 2015</b>		<b>1,274,131</b>	<b>6,671,609</b>
<b>2016</b>			
MEXICO	OCTOPUS FROZEN/DRIED/SALTED/BRINE	1,101,931	6,230,584
MEXICO	OCTOPUS LIVE/FRESH	18,743	125,514
<b>Grand Total: 2016</b>		<b>1,120,674</b>	<b>6,356,098</b>
<b>2017</b>			
MEXICO	OCTOPUS FROZEN	259,822	1,928,831
<b>Grand Total: 2017</b>		<b>259,822</b>	<b>1,928,831</b>

## National Marine Fisheries Service Fisheries Statistics and Economics Division

**You asked for the following**

Trade Type:               IMPORTS  
 From:                     2012  
 Through:                 2017  
 Product:                 RAYS, SKATES  
 Countries:                MEXICO

*Note: If a month is not listed, then we do not have data for that month. Current data through March, 2017.*

Country	Product Name	Kilos	Dollars
<b>No Data For 2012</b>			
<b>2013</b>			
MEXICO	RAYS, SKATES FRESH	11,115	33,116
<b>Grand Total: 2013</b>		<b>11,115</b>	<b>33,116</b>
<b>2014</b>			
MEXICO	RAYS, SKATES FRESH	4,585	11,464
<b>Grand Total: 2014</b>		<b>4,585</b>	<b>11,464</b>
<b>No Data For 2015</b>			
<b>2016</b>			
MEXICO	RAYS, SKATES FROZEN	7,000	26,374
<b>Grand Total: 2016</b>		<b>7,000</b>	<b>26,374</b>
<b>No Data For 2017</b>			

## National Marine Fisheries Service Fisheries Statistics and Economics Division

### You asked for the following

Trade Type:               IMPORTS  
From:                       2012  
Through:                  2017  
Product:                  SEA BASS  
Countries:                MEXICO

*Note: If a month is not listed, then we do not have data for that month. Current data through March, 2017.*

Country	Product Name	Kilos	Dollars
<b>2012</b>			
MEXICO	SEA BASS (DICENTRARCHUS SPP.) FRESH	1,388	10,605
MEXICO	SEA BASS (DICENTRARCHUS SPP.) FROZEN	3,520	9,846
<b>Grand Total: 2012</b>		<b>4,908</b>	<b>20,451</b>
<b>2013</b>			
MEXICO	SEA BASS (DICENTRARCHUS SPP.) FRESH NOT > 6.8KG	26,314	38,346
<b>Grand Total: 2013</b>		<b>26,314</b>	<b>38,346</b>
<b>2014</b>			
MEXICO	SEA BASS (DICENTRARCHUS SPP.) FRESH	2,861	19,457
MEXICO	SEA BASS (DICENTRARCHUS SPP.) FRESH NOT > 6.8KG	6,110	26,235
<b>Grand Total: 2014</b>		<b>8,971</b>	<b>45,692</b>
<b>2015</b>			
MEXICO	SEA BASS (DICENTRARCHUS SPP.) FRESH	12,846	64,333
MEXICO	SEA BASS (DICENTRARCHUS SPP.) FRESH NOT > 6.8KG	15,206	62,927
<b>Grand Total: 2015</b>		<b>28,052</b>	<b>127,260</b>
<b>2016</b>			
MEXICO	SEA BASS (DICENTRARCHUS SPP.) FRESH	15,367	120,828
MEXICO	SEA BASS (DICENTRARCHUS SPP.) FRESH NOT > 6.8KG	51,133	304,246
<b>Grand Total: 2016</b>		<b>66,500</b>	<b>425,074</b>
<b>2017</b>			
MEXICO	SEA BASS (DICENTRARCHUS SPP.) FRESH	3,091	24,109
MEXICO	SEA BASS (DICENTRARCHUS SPP.) FRESH NOT > 6.8KG	18,744	64,154
<b>Grand Total: 2017</b>		<b>21,835</b>	<b>88,263</b>

## National Marine Fisheries Service Fisheries Statistics and Economics Division

**You asked for the following**

Trade Type:               IMPORTS  
 From:                       2012  
 Through:                  2017  
 Product:                  SHARK  
 Countries:                MEXICO

*Note: If a month is not listed, then we do not have data for that month. Current data through March, 2017.*

Country	Product Name	Kilos	Dollars
<b>2012</b>			
MEXICO	SHARK NSPF FRESH	23,841	40,421
MEXICO	SHARK NSPF FROZEN	1,300	2,990
<b>Grand Total: 2012</b>		<b>25,141</b>	<b>43,411</b>
<b>2013</b>			
MEXICO	SHARK NSPF FRESH	46,007	95,069
<b>Grand Total: 2013</b>		<b>46,007</b>	<b>95,069</b>
<b>2014</b>			
MEXICO	SHARK NSPF FRESH	80,756	242,095
<b>Grand Total: 2014</b>		<b>80,756</b>	<b>242,095</b>
<b>2015</b>			
MEXICO	SHARK NSPF FRESH	43,566	132,580
MEXICO	SHARK NSPF FROZEN	12,806	21,080
<b>Grand Total: 2015</b>		<b>56,372</b>	<b>153,660</b>
<b>2016</b>			
MEXICO	SHARK NSPF FRESH	28,543	69,972
<b>Grand Total: 2016</b>		<b>28,543</b>	<b>69,972</b>
<b>2017</b>			
MEXICO	SHARK NSPF FRESH	3,929	8,374
MEXICO	SHARK NSPF FROZEN	17,727	45,630
<b>Grand Total: 2017</b>		<b>21,656</b>	<b>54,004</b>

## National Marine Fisheries Service Fisheries Statistics and Economics Division

**You asked for the following**

Trade Type:               IMPORTS  
 From:                     2012  
 Through:                 2017  
 Product:                 SHRIMP  
 Countries:               MEXICO

*Note: If a month is not listed, then we do not have data for that month. Current data through March, 2017.*

Country	Product Name	Kilos	Dollars
<b>2012</b>			
MEXICO	SHRIMP BREADED FROZEN	7,843	85,498
MEXICO	SHRIMP CANNED	11,603	111,507
MEXICO	SHRIMP COLD-WATER PEELED FROZEN	115,338	595,232
MEXICO	SHRIMP COLD-WATER SHELL-ON FRESH/DRIED/SALTED /BRINE	4,717	52,860
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 15/20	3,388,198	34,686,418
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 21/25	4,214,470	37,745,955
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 26/30	2,412,885	20,048,615
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 31/40	1,808,963	13,901,450
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 41/50	485,769	3,170,976
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 51/60	196,486	1,159,714
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 61/70	145,794	809,860
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN < 15	3,320,777	43,412,408
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN > 70	179,923	949,408
MEXICO	SHRIMP FROZEN IN ATC	400	3,692
MEXICO	SHRIMP FROZEN OTHER PREPARATIONS	163,976	2,249,386
MEXICO	SHRIMP OTHER PREPARATIONS	1,300	15,789
MEXICO	SHRIMP WARM-WATER PEELED FRESH/DRIED/SALTED/BRINE	300	2,370
MEXICO	SHRIMP WARM-WATER PEELED FROZEN	439,662	4,920,156
MEXICO	SHRIMP WARM-WATER SHELL-ON FRESH/DRIED/SALTED /BRINE	5,371	34,318
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 15/20	1,516,747	16,820,685
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 21/25	2,717,508	25,337,932
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 26/30	1,783,892	15,145,903
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 31/40	1,225,657	8,229,907
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 41/50	228,908	1,646,409

MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 51/60	194,344	1,273,096
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 61/70	32,551	288,626
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN < 15	1,487,381	22,778,140
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN > 70	201,242	673,243
<b>Grand Total: 2012</b>		<b>26,292,005</b>	<b>256,149,553</b>
<b>2013</b>			
MEXICO	SHRIMP CANNED	10,281	103,428
MEXICO	SHRIMP COLD-WATER PEELED FROZEN	16,438	109,160
MEXICO	SHRIMP COLD-WATER SHELL-ON FRESH/DRIED/SALTED /BRINE	1,668	17,398
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 15/20	1,002,649	14,013,610
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 21/25	1,105,462	13,028,577
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 26/30	695,780	7,592,016
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 31/40	702,523	7,060,687
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 41/50	178,370	1,519,090
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 51/60	60,088	421,925
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 61/70	18,971	155,847
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN < 15	1,384,156	23,122,503
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN > 70	35,745	304,095
MEXICO	SHRIMP FROZEN IN ATC	14,638	375,844
MEXICO	SHRIMP FROZEN OTHER PREPARATIONS	308,385	3,892,232
MEXICO	SHRIMP OTHER PREPARATIONS	1,000	15,169
MEXICO	SHRIMP WARM-WATER PEELED FROZEN	530,135	8,336,271
MEXICO	SHRIMP WARM-WATER SHELL-ON FRESH/DRIED/SALTED /BRINE	1,572	23,124
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 15/20	3,329,185	52,220,369
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 21/25	2,107,090	30,681,761
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 26/30	1,551,188	18,862,632
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 31/40	891,171	10,695,053
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 41/50	273,338	2,851,758
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 51/60	246,147	2,079,182
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 61/70	204,378	1,720,589
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN < 15	3,578,169	62,859,369
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN > 70	238,087	1,911,117
<b>Grand Total: 2013</b>		<b>18,486,614</b>	<b>263,972,806</b>
<b>2014</b>			
MEXICO	SHRIMP COLD-WATER PEELED FROZEN	5,954	62,584

MEXICO	SHRIMP COLD-WATER SHELL-ON FRESH/DRIED/SALTED /BRINE	180	2,760
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 15/20	98,631	1,784,891
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 21/25	61,822	1,026,459
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 26/30	54,076	747,147
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 31/40	127,229	1,215,242
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 41/50	5,714	72,356
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 51/60	17,909	164,504
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN < 15	86,274	1,931,683
MEXICO	SHRIMP FROZEN IN ATC	13,958	313,259
MEXICO	SHRIMP FROZEN OTHER PREPARATIONS	69,496	1,556,984
MEXICO	SHRIMP OTHER PREPARATIONS	1,145	19,404
MEXICO	SHRIMP WARM-WATER PEELED FRESH/DRIED/SALTED/BRINE	2,313	28,841
MEXICO	SHRIMP WARM-WATER PEELED FROZEN	659,000	11,867,513
MEXICO	SHRIMP WARM-WATER SHELL-ON FRESH/DRIED/SALTED /BRINE	4,841	54,114
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 15/20	3,802,783	63,073,883
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 21/25	3,899,686	54,670,558
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 26/30	3,409,676	39,426,380
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 31/40	2,368,891	23,412,361
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 41/50	251,393	2,340,507
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 51/60	439,507	3,646,471
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 61/70	310,851	2,601,717
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN < 15	4,661,877	93,106,902
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN > 70	3,286	52,500
<b>Grand Total: 2014</b>		<b>20,356,492</b>	<b>303,179,020</b>
<b>2015</b>			
MEXICO	SHRIMP CANNED	5,166	25,354
MEXICO	SHRIMP COLD-WATER PEELED FROZEN	2,931	32,107
MEXICO	SHRIMP COLD-WATER SHELL-ON FRESH/DRIED/SALTED /BRINE	3,750	54,750
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 15/20	95,756	1,465,726
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 21/25	68,853	849,627
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 26/30	157,730	1,321,254
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 31/40	299,470	2,186,538
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 41/50	88,621	771,719
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 51/60	8,800	30,376
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN < 15	71,958	1,615,467



MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN > 70	5,840	74,010
MEXICO	SHRIMP FROZEN IN ATC	35,032	463,798
MEXICO	SHRIMP FROZEN OTHER PREPARATIONS	175,756	3,769,401
MEXICO	SHRIMP OTHER PREPARATIONS	11,466	168,451
MEXICO	SHRIMP WARM-WATER PEELED FROZEN	725,548	10,683,401
MEXICO	SHRIMP WARM-WATER SHELL-ON FRESH/DRIED/SALTED /BRINE	7,400	71,854
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 15/20	3,506,675	51,343,474
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 21/25	6,651,437	72,013,514
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 26/30	5,153,122	47,101,295
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 31/40	4,422,898	33,641,110
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 41/50	1,701,855	10,876,362
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 51/60	709,434	4,002,591
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 61/70	318,990	1,746,044
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN < 15	3,688,142	75,559,426
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN > 70	78,754	513,580
<b>Grand Total: 2015</b>		<b>27,995,384</b>	<b>320,381,229</b>
<b>2016</b>			
MEXICO	SHRIMP BREADED FROZEN	115,325	1,082,653
MEXICO	SHRIMP CANNED	23,106	116,395
MEXICO	SHRIMP COLD-WATER PEELED FROZEN	5,443	65,760
MEXICO	SHRIMP COLD-WATER SHELL-ON FRESH/DRIED/SALTED /BRINE	6,679	87,811
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 15/20	163,114	2,097,701
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 21/25	150,518	1,621,589
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 26/30	492,125	4,929,050
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 31/40	201,667	1,832,137
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 41/50	44,144	372,865
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 51/60	19,112	182,190
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN < 15	86,918	1,819,070
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN > 70	6,343	82,105
MEXICO	SHRIMP FROZEN IN ATC	29,485	633,312
MEXICO	SHRIMP FROZEN OTHER PREPARATIONS	131,243	1,454,594
MEXICO	SHRIMP OTHER PREPARATIONS	9,111	98,607
MEXICO	SHRIMP WARM-WATER PEELED FRESH/DRIED/SALTED/BRINE	4,280	63,203
MEXICO	SHRIMP WARM-WATER PEELED FROZEN	1,228,871	14,191,285
MEXICO	SHRIMP WARM-WATER SHELL-ON FRESH/DRIED/SALTED /BRINE	4,636	64,772

MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 15/20	3,326,807	45,179,520
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 21/25	6,230,191	71,263,177
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 26/30	5,043,338	51,123,950
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 31/40	2,346,123	21,209,277
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 41/50	1,887,666	15,251,095
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 51/60	712,259	5,258,410
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 61/70	50,570	398,700
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN < 15	2,998,654	54,260,498
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN > 70	8,808	70,070
<b>Grand Total: 2016</b>		<b>25,326,536</b>	<b>294,809,796</b>
<b>2017</b>			
MEXICO	SHRIMP BREADED FROZEN	10,464	132,809
MEXICO	SHRIMP CANNED	24,242	132,992
MEXICO	SHRIMP COLD-WATER SHELL-ON FRESH	249	3,300
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 15/20	26,584	383,384
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 21/25	60,520	663,717
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 26/30	87,005	869,536
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 31/40	22,976	204,298
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 41/50	24,769	265,295
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN 51/60	9,173	86,724
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN < 15	41,829	1,139,054
MEXICO	SHRIMP COLD-WATER SHELL-ON FROZEN > 70	4,182	61,882
MEXICO	SHRIMP FROZEN IN ATC	17,060	372,048
MEXICO	SHRIMP FROZEN OTHER PREPARATIONS	24,190	763,893
MEXICO	SHRIMP OTHER PREPARATIONS	7,807	107,891
MEXICO	SHRIMP WARM-WATER PEELED FROZEN	183,482	3,305,703
MEXICO	SHRIMP WARM-WATER SHELL-ON FRESH	4,778	65,450
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 15/20	992,811	13,777,132
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 21/25	819,751	10,216,036
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 26/30	859,243	9,075,077
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 31/40	511,871	4,839,471
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 41/50	273,522	2,231,335
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 51/60	255,819	1,946,010
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN 61/70	8,011	58,642
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN < 15	1,125,994	23,413,609
MEXICO	SHRIMP WARM-WATER SHELL-ON FROZEN > 70	363	5,672
<b>Grand Total: 2017</b>		<b>5,396,695</b>	<b>74,120,960</b>

## National Marine Fisheries Service Fisheries Statistics and Economics Division

**You asked for the following**

Trade Type:               IMPORTS  
 From:                       2012  
 Through:                  2017  
 Product:                  SNAPPER  
 Countries:                MEXICO

*Note: If a month is not listed, then we do not have data for that month. Current data through March, 2017.*

Country	Product Name	Kilos	Dollars
<b>2012</b>			
MEXICO	SNAPPER (LUTJANIDAE SPP.) FRESH	3,400,650	21,008,491
MEXICO	SNAPPER (LUTJANIDAE SPP.) FROZEN	565,725	2,573,142
<b>Grand Total: 2012</b>		<b>3,966,375</b>	<b>23,581,633</b>
<b>2013</b>			
MEXICO	SNAPPER (LUTJANIDAE SPP.) FRESH	3,185,653	20,115,826
MEXICO	SNAPPER (LUTJANIDAE SPP.) FROZEN	328,334	1,527,019
<b>Grand Total: 2013</b>		<b>3,513,987</b>	<b>21,642,845</b>
<b>2014</b>			
MEXICO	SNAPPER (LUTJANIDAE SPP.) FRESH	2,938,233	19,806,106
MEXICO	SNAPPER (LUTJANIDAE SPP.) FROZEN	343,179	1,579,959
<b>Grand Total: 2014</b>		<b>3,281,412</b>	<b>21,386,065</b>
<b>2015</b>			
MEXICO	SNAPPER (LUTJANIDAE SPP.) FRESH	3,575,402	22,884,485
MEXICO	SNAPPER (LUTJANIDAE SPP.) FROZEN	322,624	1,722,025
<b>Grand Total: 2015</b>		<b>3,898,026</b>	<b>24,606,510</b>
<b>2016</b>			
MEXICO	SNAPPER (LUTJANIDAE SPP.) FRESH	4,531,446	28,307,600
MEXICO	SNAPPER (LUTJANIDAE SPP.) FROZEN	443,440	2,116,011
<b>Grand Total: 2016</b>		<b>4,974,886</b>	<b>30,423,611</b>
<b>2017</b>			
MEXICO	SNAPPER (LUTJANIDAE SPP.) FRESH	1,595,280	9,384,523
MEXICO	SNAPPER (LUTJANIDAE SPP.) FROZEN	209,589	965,342
<b>Grand Total: 2017</b>		<b>1,804,869</b>	<b>10,349,865</b>