

## Upper Gulf of California Gillnet Shrimp Production and Transportation 2021-2022 Harvest Season

### Method

1. Requests were presented to CONAPESCA under the Mexican law for access to public information to obtain two sets of documents pertaining to the September 2021 – March 2022 shrimp harvest season:
  - a. All avisos de arribo (landings reports) reporting harvest with small-scale gear, filed in the four CONAPESCA offices closest to the Upper Gulf of California: San Felipe, Mexicali, Golfo de Santa Clara, and Puerto Peñasco
  - b. All guías de pesca (waybills, required for transportation of seafood products across state borders<sup>1</sup>) that were filed in the CONAPESCA offices in Mexicali and Puerto Peñasco (the two local offices where waybills may be obtained).
2. Landings reports and waybills were filtered to identify those which pertained to shrimp harvest or transportation.
3. Waybills include the aviso de arribo serial numbers (which allows identification of the harvester) the name and location of the individual or company requesting the waybill, and the location and address to which the product was sent. Waybills filed by individuals (as opposed to businesses) were censored for privacy reason by CONAPESCA thus did not contain any identifying information about the destination of the product. For waybills filed by business, information on the destination was released and in some cases allowed identification of the recipient. Information was also collected from local sources (including in the harvesting, transportation, and processing segments of the supply chain) which supported the identification of processing plants, though names of suspected recipients have not been included in this report due to the circumstantial nature of the information.
4. Waybills were classified into one of three categories based upon the landings report serial number, which contains a two letter prefix that differentiates between the type of vessel: small-scale vessel product (BE), large-scale vessel product (AE), and other. “Other” refers to shipments for which documents of legal origin other than arrival notices were used, including invoices, harvest notices (specific to farm-raised product), inventories of species in a closed season, and certificates of donation or award (typically issued to identify a product that has been confiscated by the government and donated to a charitable institution).
5. Data were tabulated to identify the main producers (from the landings reports), the main transporters (from the waybills), and the main destination (from the waybills).

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<sup>1</sup> [https://dof.gob.mx/nota\\_detalle.php?codigo=677049&fecha=28/01/2004#gsc.tab=0](https://dof.gob.mx/nota_detalle.php?codigo=677049&fecha=28/01/2004#gsc.tab=0)

## Results

### *Main harvesters*

692 landing reports were received from CONAPESCA. The landings reports indicate that just over 900,000 kg of shrimp was harvested by small-scale producers in the upper Gulf of California during the 2021-2022 season (Table 1). This is a substantial increase compared to the 550,000 kg harvested during the 2020-2021 season.

**Table 1:** 2021-2022 small-scale shrimp harvest registered in upper Gulf CONAPESCA offices.

CONAPESCA office	Volume (kg)
Mexicali	208,228
San Felipe	317,828
Puerto Peñasco	93,726
Santa Clara	290,412
<b>Total</b>	<b>910,194</b>

According to the landings reports, the top 16 producers in the upper Gulf of California accounted for approximately 88% of the production (Table 2). The remainder of the harvest was captured by 49 other producers, each accounting for <2% of the total harvest.

**Table 2:** The top 16 producers of upper Gulf of California shrimp during the 2021-2022 season.

Top 16 Producers	Volume (kg)	% of total
SCP Ribereños Punta Estrella SPR de RL	135,511	15%
La Pamita SPR de RL	108,657	12%
SCPP Boca del Mar Platino SC de RL de CV	81,142	9%
Union de Pescadores Atenea de Los Mares SPR de RL	72,543	8%
SCPP Golsomax SA de RL de CV	52,581	6%
Faro Garcia SPR de RL	51,250	6%
SCPP Mar Y Tierra del Golfo de Cortez SC de RL	43,721	5%
Pesquera a Bahia San Felipe SC de RL	40,600	4%
SCPP Rib Marelba Leymor SCL	40,378	4%
SCPP y ST Huva del Norte HDN SC de RL de CV	28,050	3%
SCPP La Vaquita de Los Angulo SC de RL de CV	26,600	3%
SCPP Arena y Mar de Peñasco SC de RL	26,500	3%
El Desierto de Matomi SPR de RL	25,633	3%
SCPP y A Playa Curvina SC de RL	24,657	3%
SCPP Ribereña Demetrio Soberantes Castro SCL	20,430	2%
SCPP Pescadores del Golfo de Santa Clara SC de RL	19,719	2%
<b>Total</b>	<b>797,972</b>	<b>88%</b>

### *Main transporters*

1823 waybills were received from CONAPESCA, accounting for transportation of 2,344 tons of shrimp. The vast majority (1,648) were filed in Puerto Peñasco. Approximately 1,445 tons (62%) of the transported shrimp originated from the industrial fishery, while about 803 tons (34%) originated from the small-scale fishery. The remaining 95 tons (4%) could not be attributed to a specific sector.

The waybills for small-scale product were filed by 52 companies or individuals. These waybills account for the movement of approximately 803 tons of shrimp. Over 50% of the volume of small-scale shrimp was transported in November and December, but substantial volumes were also transported in October, January, February, March, and even April. The top 10 waybill filers are shown Table 3, and account for transport of nearly 700 tons of shrimp, approximately 87% of the total volume transported. All of the top 10 waybill filers also appear in Table 2, the top 16 small-scale shrimp producers.

**Table 3:** The top 10 waybill filers (by volume transported) of small-scale upper Gulf of California shrimp during the 2021-2022 season.

<b>Filer of the waybill</b>	<b>No. of waybills</b>	<b>Volume transported (kg)</b>	<b>% total vol.</b>
SCP Ribereños Punta Estrella SPR de RL	69	213,371	27%
SCPP Boca del Mar Platino SC de RL de CV	84	137,978	17%
La Pamita SPR de RL	37	77,178	10%
SCPP Golsomax SA de RL de CV	24	58,231	7%
SCPP Arena y Mar de Peñasco SC de RL	30	47,070	6%
SCPP La Vaquita de Los Angulo SC de RL de CV	48	46,429	6%
Faro Garcia SPR de RL	21	38,415	5%
SCPP y A Playa Curvina SC de RL	40	29,427	4%
SCPP y ST Huva del Norte HDN SC de RL de CV	22	25,825	3%
SCPP Mar Y Tierra del Golfo de Cortez SC de RL	49	25,659	3%
<b>Total</b>	<b>424</b>	<b>699,583</b>	<b>87%</b>

### *Main destinations*

Over half of the volume of small-scale shrimp transported from upper Gulf of California ports appears to have been delivered to seven locations (Table 4), but the largest volume (over one quarter of the total) was transported to unknown locations in the Ahome municipality in Sinaloa. Of that which was transported to Ahome, the majority (137 tons) was covered by

waybills filed by SCP Ribereños Punta Estrella SPR de RL and supposedly taken to Los Algodones, a small town of less than 500 people about 35 kilometers from Los Mochis. The vast majority of those waybills claimed that the shrimp was not sold to a single business, but was sold in the plaza (“venta en plaza”).

**Table 4:** Destinations of small-scale shrimp transported from the upper Gulf of California as declared by the companies that filed waybills to transport that product.

<b>Destination</b>	<b>Volume (kg)</b>	<b>Waybill filers</b>
Unknown – Ahome (SIN) -Col. Rancheria Los Algodones -Los Mochis, Col. Centro -Centro, Col. Centro -Callejon Rubi Los Mochis #552, Col. Centro -Fuente Florentina Los Mochis, Col. Miguel Hidalgo	222,045	1. SCP Ribereños Punta Estrella SPR de RL 2. SCPP La Vaquita de Los Angulo SC de RL de CV 3. SCPP y ST Huva del Norte HDN SC de RL de CV
Guaymas SON - Ave Luis Encinas y Calle 5, Col. Guaymas Centro - Calle 14, Col. Guaymas Centro - Col. Guaymas Centro	200,725	1. SCPP Boca del Mar Platino SC de RL de CV 2. La Pamita SPR de RL 3. SCPP Golsomax SA de RL de CV
Guasave SIN - Tlatelolco #374, Col. Jardines de San Jose - Campo Pesquero Boca del Rio, Col. Pueblo Boca del Rio - Alvaro Obregon, Col. Estación la Brecha - Col. Ejido el Huitussi y Anexos	61,112	1. Faro Garcia SPR de RL 2. El Desierto de Matomi SPR de RL
Navojoa SON - Col. Congregación Bahuises - Col. Navojoa Centro	55,655	1. SCP Ribereños Punta Estrella SPR de RL 2. SCPP Arena y Mar de Peñasco SC de RL
Obregon SON - Col. Parque Industrial - Col. Obregon Centro	48,445	1. SCP Ribereños Punta Estrella SPR de RL 2. La Pamita SPR de RL
Guaymas SON - Ave Serdan entre Calle 9 y 10, Col. Guaymas Centro	36,700	1. SCPP Boca del Mar Platino SC de RL de CV
Huatabampo SON - Col. Huatabampo Centro	30,258	1. SCPP y A Playa Curvina SC de RL

### *Certificates of Donation or Award*

A potential new mechanism of laundering shrimp arose during the 2021-2022 harvest season. Twelve waybills filed in Puerto Peñasco used Certificates of Donation or Award (Constancia de Donación o Adjudicación) to support the legal provenance of 31,119 kg of shrimp. These waybills were filed by four shippers (Table 5) for the transportation of both small-scale and industrial shrimp from Puerto Peñasco and Golfo de Santa Clara to various locations in Sonora, Baja California, Sinaloa, and the United States.

**Table 5:** Information from waybills using Certificates of Donation or Award to support legal provenance of the shrimp.

Filer of the Waybill	Waybill #	Origin	Destination	Donation Certificate #	Aviso de arribo	Volume (kg)
Macro Seafood	26220007154	Puerto Peñasco SON	Guaymas SON	26220006276	BE2021132838	3,600
				26220006616	BE2021125698 BE2021152537	
MPI Fisheries Inc	26210021521	Puerto Peñasco SON	Vernon CA	26210017444	AE2021013033	1,179
Procesadora Las Brisas	26220000129	Golfo de Santa Clara SON	Vernon CA	25210022439	BE2021103393	13,608
Real del Mar Seafoods	26210020289	Golfo de Santa Clara SON	San Felipe BC	25210025960	Not provided	0
	26210021473			26210017444	AE2021010370	1,031
	26220000298					1,008
	26220000542					1,000
	26220001095					1,000
	26220001553					1,000
	26220003627			26210021193	AE2021014360	900
	26220004128		Los Mochis SIN	26210021200	AE2021014366	3,625
	26210021097		Chula Vista CA	25210025960	BE2021115343	3,168

Copies of the Certificates of Donation or Award were requested from CONAPESCA through the Commission's Transparency Unit in July 2022. In its answer, CONAPESCA stated that the requested Certificates do not exist but instead provided waybills with the same serial number as the requested Certificates (Table 6), meaning that the former 12 waybills (Table 5) were based upon wrongly declared information but were authorized by CONAPESCA.

**Table 6:** Information provided by CONAPESCA on waybills with serial numbers corresponding to the incorrectly reported Certificates of Donation or Award.

Filer of the waybill	Waybill # (Donation Certificate #)	Origin	Destination	Volume (KG)
Macro Seafood	26220006276	Guaymas SON	Puerto Peñasco SON	1,057
	26220006616			
Procesadora Mar de Cortez	26210017444	Puerto Peñasco SON	Golfo de Santa Clara SON	12,730
	26210021193			7,228
Procesadora Las Brisas	25210022439	Altata, SIN	Golfo de Santa Clara SON	5,182
	25210025292*			8,234
	25210026461*			5,532
Real del Mar Seafoods	25210025960	Mazatlan SIN	Golfo de Santa Clara SON	5,000
Miguel Angel Galvez	26210021200	Bahia de Kino SON	Golfo de Santa Clara SON	8,453

\* Serial numbers not reported as Certificates of Donation but provided by CONAPESCA in their response

Comparison of volumes and origin/destination information in Table 5 and Table 6 (using the Donation Certificate # to link information between the tables) raises red flags as to the chain of custody. For example, it does not make sense that Macro Seafood shipped 3,600 kg of shrimp from Puerto Peñasco to Guaymas (waybill #26220007154), given that the referenced previous waybills (#26220006276 and #26220006616) claim that 1,057 kg shrimp was originally shipped from Guaymas to Puerto Peñasco. It makes even less sense when considering that the two avisos de arribo referenced for this same product (BE2021132838 and BE2021125698) were filed by La Pamita, a cooperative located in San Felipe, BC. As another example, it seems unlikely that Procesadora Las Brisas, a plant in Golfo de Santa Clara, bought and transported shrimp from Altata, over 1,000 km south, (#25210022439) to process in Santa Clara before shipping to Vernon, CA (#26220000129).

A more likely scenario is that instead of physically moving illegal small-scale shrimp to the south for processing and laundering, the shrimp remains in the upper Gulf but false paperwork (avisos de arribo and guias de pesca) are purchased to establish a chain of custody originating elsewhere. The false references to non-existent Certificates of Donation or Award adds a further layer of opacity, helping to further obscure the true origin of the shrimp.

## Conclusions

1. Illegal gillnet harvest of shrimp in the upper Gulf of California occurred above historic levels during the 2021-2022 harvest season. The top 16 producers in the upper Gulf of California accounted for approximately 87% of the production.
2. A slightly lower amount of shrimp was transported out of the upper Gulf of California region for processing and/or sale during the 2021-2022 harvest season. The transportation was facilitated by many of the same organizations that harvested the shrimp.
3. While not all receivers were able to be identified due to information censored by CONAPESCA for privacy purposes, it appears that over half of the shrimp transported out of the upper Gulf of California region was shipped to just seven general locations.
4. A new method of shrimp laundering may have been applied during the 2021-2022 shrimp season: use of Certificates of Donation or Award to make the chain of custody less clear.