



Christopher Ben Daughtry, Owner and President of Dynasty Marine Associates, Inc. from 1995 to Present, born and Raised in the Florida Keys, and a Florida State University Graduate. I have lived my life fishing and diving the waters of the Florida Keys for 5 decades. With more than 30 years of professional experience collecting marine life for public aquariums around the world, I have spent literally thousands of hours underwater giving me a unique perspective of what has been happening to our Keys underwater reefs and ecosystems. At the public educational interactive aquarium, which I founded and am the owner and president, we have the opportunity to teach tens of thousands of visitors each year about the importance of our underwater ecosystem.

This comment is provided in response to the possible uplisting of the genus *Mobula* from CITES Appendix II to Appendix I. Dynasty Marine would request that the USFWS oppose the uplisting. While we understand that there are conservation threats to these species, in the US, they are already highly protected and managed at both the federal and state levels with very minimal take of any specimens.

However, if the US were to consider voting to uplist these species, we would request that the US either propose a split listing for the species, which would maintain the US populations of these species in Appendix II, or include an annotation modeled on annotations A8 and A10 for southern white rhino and certain populations of African elephant.

To the best of our knowledge, Dynasty Marine is the sole exporter of *M. hypostoma* and *M. biriostris* from the United States, with only 66 and 3 specimens exported in the last 6-8 years. This trade represents an incredibly small percentage of the purported world trade in this genus. All the specimens we collect and export from the United States are sent to public zoos and aquaria, where they are publicly displayed in aquariums for educational purposes. Our specimens are viewed by millions of visitors each year and are ambassadors for their species, teaching the public the value of conserving the oceans and the wild populations of this charismatic megafauna.

Dynasty Marine is the world leader in providing these species to public aquariums. These species are incredibly difficult to capture and transport alive due to their size and lifestyles. However, our clients know that when they order these specimens

from Dynasty Marine in the United States, they come from an area where the populations are protected and that the small amount of take allowed is not detrimental to the long-term sustainability of the populations. They also know that the utmost care and attention is taken to protect the health and welfare of the specimens we collect.

Dynasty Marine hopes that we will be able to continue providing these spectacular animals to zoos and aquaria for the foreseeable future. They can provide a window into the amazing world that many will never get to see themselves. Therefore, if the genus *Mobula* is to be uplisted at CoP20, we would request that the USFWS take one of two possible courses of action.

The USFWS should request a split listing, with the US populations of species in the genus *Mobula* remaining in Appendix II. Alternatively, the USFWS should request an annotation be included modeled on annotations A8 and A10 for southern white rhinos and certain populations of African elephants. Such an annotation should request that "the US population of species in the genus *Mobula* shall be included in Appendix II for the exclusive purpose of allowing international trade in live animals to appropriate and acceptable destinations."

The literature presented to advocate for uplisting these species in Appendix I demonstrates that the world trade for this species is almost exclusively in gill rakes used for consumption in Asia. A split listing for the US population or an annotation for live specimens would not permit traders to otherwise circumvent the uplisting.

The US populations of these species are well and heavily regulated at the state and federal levels. Furthermore, the live shipment of these animals is incredibly complex, requiring oxygenated tanks and costing thousands of dollars in freight cost for each *M. Hypostoma* and tens of thousands of dollars for each *M. birostris*. This expense negates the possibility that live specimens of *Mobula* species will be shipped for any purpose other than public display.

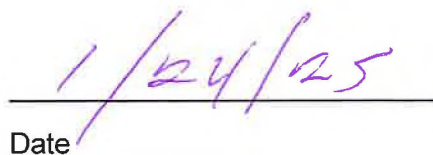
While Dynasty Marine understands that these species face threats, we hope that the US will take a position that acknowledges the valuable and sustainable work our company does to bring these beautiful animals to public display around the world. Conservation requires understanding, and the zoo and aquarium we supply are at the forefront of those efforts.



Christopher Ben Daughtry

President

Dynasty Marine Associates Inc.


Date