



มูลนิธิเพื่อนสัตว์ป่า
Wildlife Friends Foundation



Urgent Action Required for Asian Big Cats at CITES CoP19



Parties to the 19th meeting of the Conference of the Parties are reminded of the critical conservation status of Asia's big cats, the continued demand that is driving poaching and trafficking, the slow progress in implementation of Res. Conf. 12.5 (Rev CoP18) and associated Decisions, and the disappointing track record of reporting by some Asian big cat range States, are urged to consider the following recommendations at this meeting:

- Support the Secretariat's proposal regarding retention of Decision 14.69, the renewal of Decisions 18.108 and Decision 18.109 and additions to Res. Conf. 12.5 (Rev CoP18) as detailed in this document.
- Retain Decisions 18.100, 18.101, and 18.105 since it is clear that these Decisions are yet to be implemented.
- Ensure the Terms of Reference for the missions to captive tiger facilities of concern review not just the practices at individual facilities, but the regulations and practices around

monitoring, inspection and enforcement, and that experts in managing big cat rescue centers and sanctuaries are engaged in the missions.

- Adopt a decision encouraging Vietnam and Lao PDR to cooperate and conduct joint investigations to determine the source of tiger specimens seized in Vietnam which are suspected to originate from Lao PDR and report to SC77 on the measures that have been taken.
- Adopt a decision encouraging Lao PDR and other relevant Parties, particularly China, to take effective enforcement action to shut down the trade in Asian big cat parts and derivatives at "wildlife trade tourism" markets referred to in CoP18. Doc. 71.1, and to report to SC77 on the measures that have been taken.
- Adopt a decision encouraging Lao PDR to:
 - a) Suspend the breeding of tigers in all captive facilities in its territory at a minimum by separating the sexes;
 - b) Establish a stripe pattern database for the tigers in the captive facilities in its territory initially utilizing the images that have already been obtained;
 - c) Convene an advisory group including experts in running big cat sanctuaries (i.e. non-commercial) to advise on the phase out of tiger farms;
 - d) Take enforcement action against the known criminal enterprises that continue to keep tigers in captivity; and
 - e) Report to the Secretariat on its implementation of this decision for consideration by the Standing Committee at its 77th and 78th meetings.
- Adopt a decision requesting Parties that have not closed their domestic markets for commercial trade in Asian big cat parts and derivatives, particularly China with regard to its domestic market for leopard bone products, to report to the Secretariat for consideration by the Standing Committee at its 77th and 78th meetings on what measures they are taking to ensure that such markets are not contributing to poaching or illegal trade.
- Adopt a decision directing consumers States, in particular China and Vietnam, to report on the implementation of government-led, science-based consumer behaviour change campaigns to reduce demand for Asian big cat parts and derivatives, using the proposed CITES Guidance on demand reduction in Annex 3 of CoP19 Doc. 38.

Background

Status of Asian Big Cats

Asia's big cats; tigers, leopards, snow leopards and clouded leopards continue to be threatened by poaching for trade in their body parts and derivatives.

There are only around 4500¹ wild tigers remaining across their range, representing an approximate 95% decline from the estimated population at the turn of the 20th century.

Over 3,377 tigers have been seized in trade since the year 2000, and while at least 744² of these are believed to have come from captive bred sources, the vast majority of tigers in trade are wild sourced. The continued poaching and trafficking of wild tigers puts paid to the myth that tiger farming relieves pressure on wild tigers. Captive breeding facilities are also a source for illegal trade in tiger parts and derivatives.

Over the same period, over 6,600 leopards have been seized across Asia³. These forgotten cats have disappeared from 85% of their Asian range while snow leopards and clouded leopards are also in demand for their skins and bones.

The population of snow leopards is estimated to be between 3,920 and 6,390⁴ and the most recent trade assessments suggested that an average of 450 snow leopards a year were being killed⁵.

The most recent IUCN assessment estimates that there are as few as 3700 - 5580⁶ mainland clouded leopards remaining, that they continue to decline and may be extinct in Vietnam and close to extinction in China and Bangladesh.⁷ Reports on trade in southeast Asia suggest clouded leopard specimens are the most frequently offered big cats in border markets⁸, and that trade in skins, skulls, and teeth continues.⁹

Ongoing Demand for Asian Big Cat Parts and Derivatives

The skins of tigers and other Asian big cats are used for luxury home decor and purchased as status symbols, processed as skins for decorating the floor, wall, sofa or as taxidermy. Off cuts are used to make tiger skin wallets and slippers, or small pieces are used for amulets.

Tiger bones are used within Traditional Chinese Medicine (TCM) to treat rheumatism and arthritis, are soaked in wine which is variously sold as a health tonic, prestigious gifts and male virility products. Bones are also boiled into a glue-like substance for medicinal use primarily among Vietnamese consumers.

¹ IUCN Red List 2022. Available at: <https://www.iucnredlist.org/species/15955/214862019> (last accessed 16/09/2022)

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https://www.traffic.org/site/assets/files/19714/skin_and_bones_tiger_trafficking_analysis_from_january_2000_to_june_2022_r5_compressed.pdf

³ <https://eia-international.org/global-environmental-crime-tracker/>

⁴ <https://snowleopard.org/the-threats/>

⁵ <https://snowleopard.org/red-list-status-of-snow-leopard-data-doesnt-support-the-iucns-decision/>

⁶ <https://www.iucnredlist.org/species/14519/198843258>

⁷ <https://www.sciencedirect.com/science/article/pii/S2351989420308957>

⁸

https://www.researchgate.net/publication/269141541_Trade_in_tigers_and_other_wild_cats_in_Mong_La_and_Tachilek_Myanmar_-_A_tale_of_two_border_towns

⁹ <https://www.thethirdpole.net/en/nature/clouded-leopards-may-be-rarer-than-wild-tigers-across-mainland-asia-2-2/>

Leopard bone is used in the licensed manufacture and sale of leopard bone pills and wine in China¹⁰. Snow leopard and clouded leopard bones have also been used and labels on medicines often refer to a generic term for leopard bone in the ingredients, “Os pardi”.¹¹

Asian big cat teeth and claws are sold as expensive jewelry, and are among the most high-profit, low-risk items as they are so easily concealed. Tiger meat is consumed as a delicacy, while dead tiger cubs are combined with other ingredients such as snakes, scorpions, and bear paw, to make a wine that is seen as a status symbol.



L-R: Tiger skin (online trade), tiger bone wine ©EIAimage, tiger cubs (online trade)

CITES and Asian Big Cats

Illegal trade in Asian big cats continues despite these species being listed on Appendix I of CITES since 1975 (with the exception of the Siberian tiger added in 1987). Commitments in Resolution 12.5 (Rev. CoP18) have not always been matched with adequate investment in effective enforcement and demand reduction. These commitments have been positively undermined by national level policies and practices that enable the commercial breeding of tigers and international and national trade in their body parts.

Since 1993, and the emergence of a renewed tiger poaching crisis, CITES has adopted recommendations to close domestic markets, end tiger farming, call for targeted enforcement action at key tiger trade hotspots, and science-based consumer behaviour change campaigns. This has been done through successive amendments to Res. Conf. 12.5 (Rev Cop18) (and previously Res. Conf. 9.13 and Res. Conf. 11.5), and numerous associated Decisions. The effectiveness of CITES is determined by the willingness of Parties to implement these recommendations.

The CITES Secretariat is required to report to the CITES Conferences of the Parties and the CITES Standing Committee on implementation of Res. Conf. 12.5 (Rev CoP18) and associated Decisions, based on information provided by the range States. For many years reports have been inconsistent and often non-existent. Only a handful of Asian big cat range state countries have regularly provided meaningful reports.

¹⁰ <https://cites.org/sites/default/files/eng/cop/18/doc/E-CoP18-071-01.pdf>

¹¹ <https://eia-international.org/wp-content/uploads/EIA-report-Bitter-Pill-to-Swallow-spreads.pdf>

The CITES Secretariat and concerned Parties and stakeholders have attempted various different mechanisms over the years to solicit relevant information to assess implementation of the CITES Resolution and Decisions related to Asian big cats. This included a detailed questionnaire (Notification No. 2015/0006 dated 30 January 2015), to which some Parties could not provide data, reinforcing concerns about the capacity and commitment to implement Resolutions and Decisions.

Subsequently, the CITES Secretariat commissioned two independent reviews and analysis, one submitted and adopted at SC65 in 2014¹² and an update adopted at CoP18 in 2019.¹³ These detailed assessments highlighted the gaps as well as good practices among range States and the CITES Standing Committee was tasked with drawing on these reviews to propose time-bound, country-specific recommendations to focus on specific challenges and ensure meaningful progress.

The Decisions adopted at CoP18 were based on the information generated by the two reviews and provided greater specificity and focus to where progress was urgently required. Thus, while we support the Secretariat's recommendations to retain Decision 14.69 and revise and adopt Decisions 18.102, 18.103, 18.108, and 18.109, we do not support the deletion of Decisions 18.100, 18.101, and 18.105 since they are yet to be implemented.

Decision 18.100 encourages Parties to take into consideration the information in CoP18 Doc. 71.1 and pursue enforcement action to address the illegal trade of Asian big cats. Much of the illegal trade outlined in that document continues to occur. A particular concern is the transboundary criminal networks operating between Vietnam and Lao PDR as evidenced by the significant seizures of tigers in Vietnam, known and suspected by authorities to have originated from Lao PDR.¹⁴ In addition to the retention of Decision 18.100, we also urge Parties to adopt a specific decision encouraging Vietnam and Lao PDR to address this illegal trade.

Decision 18.101 encourages Parties to strengthen law enforcement cooperation with neighbouring Parties to target illegal cross border trade involving Asian big cat specimens in tiger tourist markets. As highlighted in the most recent review (Cop18 Doc 71), these "wildlife trade tourism" markets operate in the Golden Triangle Special Economic Zone and other parts of Lao PDR as well as Myanmar. No meaningful enforcement action has been reported to have been taken to address illegal trade from such markets, before or since the review.

¹² https://cites.org/sites/default/files/eng/com/sc/65/E-SC65-38-A01_0.pdf

¹³ <https://cites.org/sites/default/files/eng/cop/18/doc/E-CoP18-071-01.pdf>

¹⁴ Vietnam Investment Review 2020. Man receives six-year jail term for transnational wildlife trading. Available at: <https://vir.com.vn/man-receives-six-year-jail-term-for-transnational-wildlife-trading-73268.html> (last accessed 16/09/2022); Viet Nam News. 2021. Tigers saved from illegal wildlife traffickers. Available at: <https://vietnamnews.vn/environment/1005062/tigers-saved-from-illegal-wildlife-traffickers.html> (last accessed 16/09/2022); and Education for Nature Vietnam. 2021 A major breakthrough in combatting illegal tiger trafficking in Nghe An. Available at: <https://env4wildlife.org/2021/08/17/a-major-breakthrough-in-combatting-illegal-tiger-trafficking-in-nghe-an/> (last accessed 16/09/2022)



L-R: Leopard skin for sale ©EIAimage, Tiger teeth and claw jewellery for sale online

While COVID-19 travel restrictions may have temporarily reduced the footprint of tourists in physical retail markets catering to wildlife consumers, established retailers with parallel online retail platforms (e.g. via WeChat) have continued to offer tiger and other illegal wildlife parts and derivatives for sale to be delivered by courier. This includes retail outlets in Lao PDR that have previously been reported to national authorities¹⁵, catering largely to customers from China. In addition to the retention of Decision 18.101 we also urge Parties to adopt an additional decision encouraging Lao PDR and other relevant Parties mentioned in the most recent review (CoP18 Doc 71), particularly China, to take effective enforcement action to shut down such wildlife trade tourism markets.

Decision 18.105 encourages Parties to consider and address the concerns regarding illegal leopard trade in CoP18. Doc. 71.1. Leopards continue to be the Asian big cats that are most prevalent in illegal trade, with China being the primary destination country. Leopard, clouded leopard and snow leopard are still used in the licensed production of “leopard” bone medicine in China,^{16,17} despite a lack of verification of legal acquisition¹⁸. In addition to the retention of Decision 18.105, we also urge Parties to adopt a Decision requesting Parties that have not closed their domestic markets for commercial trade in Asian big cat parts and derivatives, particularly China, to report on measures that they have taken to ensure that such markets are not contributing to poaching or illegal trade. This follows on from paragraph 1.c) of Res. Conf. 12.5 (Rev CoP18) and is in line with similar Decisions proposed for elephant ivory at this meeting.

¹⁵ EIA. 2020. On The Butchers Block: The Mekong Tiger Trade Trail. Available at: <https://reports.eia-international.org/tiger-trade-trail/> (last accessed 16/09/2022)

¹⁶ EIA. 2020. Bitter Pill to Swallow: China’s flagrant trade in leopard bone products. Available at: <https://eia-international.org/report/bitter-pill-to-swallow-chinas-flagrant-trade-in-leopard-bone-products/>

¹⁷ CITES. 2019. CoP18 Doc 71.1 Annex 4. Available at: <https://cites.org/sites/default/files/eng/cop/18/doc/E-CoP18-071-01.pdf>

¹⁸ Norges Bank Investment Management. 2021. Decisions on exclusion and revoking of exclusion. Available at: <https://www.nbim.no/en/the-fund/news-list/2021/decisions-on-exclusion-and-revoking-of-exclusion/> (last accessed 16/09/2022)



L-R: Clouded leopard skeleton for use by pharmaceutical company, China ©EIAimage, Leopard bone wine, China (online advert), Leopard skull for sale in China ©EIAimage

Whilst we welcome the renewal of the recommendations for CITES missions to tiger farming countries, we note that these recommendations were first adopted at CoP17 in 2016, and that the overarching Decision to phase out tiger farms and end trade, including domestic trade, in captive bred tiger parts was first adopted in 2007. Tiger farming countries have had ample time to amend legislation, stop the commercial breeding, introduce adequate mechanisms to ensure captive bred tiger parts do not enter trade, and yet these actions have been far from implemented as documented in responses received by the Secretariat to the questionnaires, as mentioned in SC75 Doc 9. Meanwhile the captive tiger population and the number of facilities implicated in trade is growing.

The Terms of Reference for the missions to Parties which have facilities keeping captive tigers which may be of concern, now scheduled for Jan 2023 in three countries, need to review not just the practices at individual facilities, but the regulations and practices around monitoring, inspection and enforcement - all of the tiger farms in Lao PDR for example are run by criminal enterprises that have gone unchallenged and previous incidents of trade not been investigated. There have been several high-profile raids and seizures from Thai facilities, but limited subsequent information on prosecutions and penalties.

There was initial progress in Vietnam to address illegal keeping of tigers in Nghe An Province, but no new information on actions taken to eliminate the problem.



The Secretariat's pre-mission questionnaire, mentioned in SC75 Doc 9, included questions around regulations and practices. Vietnam is still to submit theirs and responses from China and the Czech Republic were submitted after SC75 Doc. 9 was prepared, so only a verbal report was provided at SC75. Not all of the Parties that did respond provided comprehensive replies.

Lao PDR is of particular concern, where there has been inadequate action to tackle the criminal enterprises associated with the five tiger farms. In 2019, TRAFFIC estimated that 90% of tigers seized in Vietnam were suspected to have originated from or through Lao PDR¹⁹. In 2020, Vietnam convicted Nguyen Huu Hue, a Vietnamese partner in the Say Nam Theun/Thurn tiger farm in Lao PDR for trafficking dead tiger cubs^{20, 21}.

This was one of the tiger farms that was meant to have been converted into a "zoo", but was documented breeding, killing, and selling tigers prior to and during the official tiger farm audit²². Vietnamese authorities sought support from Lao PDR counterparts during the course of the investigation but were not successful. Again in 2021, there were significant seizures of tigers in Vietnam suspected to have originated from Lao PDR farms and an opportunity for Lao PDR authorities to investigate the cases^{23, 24}.

There are still five²⁵ tiger farms in Lao PDR and the businesses behind them have all been implicated in criminal activity²⁶. The most egregious example of this is the Kings Romans Group of companies, registered in Hong Kong and owned by Zhao Wei, which has an 80% share in the Golden Triangle Special Economic Zone (GTSEZ) in northern Lao PDR. The Lao PDR government itself holds the remaining share and Lao PDR officials are on the SEZ management board. In 2018, the US Department of Treasury declared Zhao Wei and other Kings Romans officials an organised crime group²⁷ for their role in drug, human and wildlife trafficking, money laundering and bribery. More recently Lao PDR authorities have had to rescue Laotian women held against their will and forced into sex trade at the GTSEZ²⁸.

Illegal wildlife trade and tiger farming at the GTSEZ has been documented repeatedly^{29, 30, 31, 32} and while there has been a public burning³³ of confiscated wildlife products, no one has been convicted of illegal wildlife trade. Since 2015/2016, when there were 26-35 tigers and 38 Asiatic black bears at the original animal enclosures at the GTSEZ, those numbers are estimated to have doubled. It is clear

¹⁹ https://www.traffic.org/site/assets/files/12344/skin_and_bones_unresolved-web-1.pdf

²⁰ <https://vir.com.vn/man-receives-six-year-jail-term-for-transnational-wildlife-trading-73268.html>

²¹ <https://e.vnexpress.net/news/news/three-jailed-for-trafficking-tiger-carcasses-from-laos-4042953.html>

²² https://www.washingtonpost.com/graphics/2019/investigations/tiger-farms-poaching-laos/?utm_term=.ce9702fdda69

²³ <https://news.vn/environment/1005062/tigers-saved-from-illegal-wildlife-traffickers.html>

²⁴ <https://env4wildlife.org/2021/08/17/a-major-breakthrough-in-combatting-illegal-tiger-trafficking-in-nghe-an/>

²⁵ In 2019 there were six, but one, Samlem Kham, was a holding facility for the new tiger and bear farm at the GTSEZ <https://eia-international.org/wp-content/uploads/EIA-document-Tiger-trade-in-Lao-PDR-and-call-for-trade-suspensions-at-CITES-SC71.pdf>

²⁶ <https://eia-international.org/wp-content/uploads/On-the-Butchers-Block-Tigers-Mekong-Report-2020-SCREEN-SINGLE-PAGES.pdf>

²⁷ <https://home.treasury.gov/news/press-releases/sm0272>

²⁸ <https://www.rfa.org/english/news/laos/rescues-escapes-02082022170241.html>

²⁹ <https://karlammann.com/2014/04/20/inside-tiger-farming-a-long-chain-of-profiteers/>

³⁰ <https://www.straitstimes.com/asia/notes-from-a-banana-field>

³¹ <https://eia-international.org/wp-content/uploads/EIA-Sin-City-FINAL-med-res.pdf>

³² <https://link.springer.com/article/10.1007/s12117-021-09408-z>

³³ <https://eia-international.org/blog/sin-city-wildlife-raids-a-start-but-what-about-the-long-term/>

from video footage³⁴ from the GTSEZ at the end of 2021, that the facility is not a zoo or a centre for education or conservation.

Vannaseng Trading Company, which is associated with two tiger farms in Lao PDR, the Vannaseng Fulrange Farm and the Laksao facility, has been implicated in a case of illegal ivory trade^{35, 36} and money laundering out of Uganda by Moazu Kromah, the ivory trader recently convicted³⁷ in the US.

Meanwhile, no one has been held to account over the disappearance of over 300 tigers from the Vinasakhone tiger farm (now called the Khammouane Zoo), which according to the Secretariat's report in 2017, were trafficked to Vietnam and China³⁸.

We therefore urge Parties to adopt a decision encouraging Lao PDR take several measures to address tiger farming and illegal trade issues.

South Africa is also of concern as the world's largest exporter of live big cats and their parts including tigers.³⁹ South Africa has stated in reply to the Secretariat's questionnaire that Decision 14.69 and 17.226 have not been implemented despite having over 200 'farms' or captive breeding facilities for both lions and tigers that have clear commercial intent.

We urge South Africa to immediately implement existing Decisions and Resolutions, to cease trading in tigers and their parts from captive sources and for commercial purposes, and to phase out the intensive breeding of tigers in facilities that are clear commercial entities.

Lastly, we encourage Parties to support the Secretariat's proposed amendments to Res. Conf. 12.5 (Rev CoP18) adding language in paragraph 1.h) to ensure that records are centrally maintained by the government to ensure the system is robust, consistent and facilitates reporting to CITES.

We also recommend minor amendments to Decision 18.108 (Rev. CoP19) b) and Decision 18.109 (Rev. CoP19) to specify reporting to SC77 and subsequent Standing Committee meeting, reflecting the urgency required to fulfil Decisions that were originally adopted at CoP17, and to address the continued growth of tiger farms.

³⁴ <https://eia-international.org/news/footage-reveals-criminal-run-tiger-farms-in-laos-have-actually-been-expanded-not-shut-down/>

³⁵ <http://www.monitor.co.ug/News/National/Foreigners-sent-for-trial-over-ivory/688334-4011216-ijtwsnz/index.html>.

³⁶ <https://globalinitiative.net/wp-content/uploads/2021/08/GITOC-ESA-Obs-Tracking-blood-money-Financial-investigations-into-wildlife-crime-in-East-Africa.pdf>

³⁷ <https://www.justice.gov/usao-sdny/pr/wildlife-trafficker-uganda-sentenced-63-months-large-scale-trafficking-rhinoceros-horns>

³⁸ <https://cites.org/sites/default/files/eng/com/sc/69/E-SC69-29-02-01.pdf>

³⁹ <https://media.4->

paws.org/a/e/4/4/ae445daeb7163daba12521cc1c79a6a71b8fc1e0/FOUR%20PAWS%20Year%20of%20the%20Tiger%20Report.pdf