



BRIEFING



environmental
investigation
agency

WILDLIFE

A VIEW FROM THE COURTS

November 2025

The illegal trade of pangolins in China



EXECUTIVE SUMMARY

All eight recognised species of pangolin face high risks of extinction, with the primary threats to their survival being poaching and trade of their meat, body parts and scales.

In order to address declining pangolin populations, increasingly stringent measures for protection of the species have been adopted both through the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and at national levels.

Over the past decade or more, China, which continues to allow legal domestic trade in pangolins for medicinal purposes, has been the primary destination for both legal and illegal international trade of pangolins. In this report, we review 169 Chinese court judgments involving pangolins from the period 2014 to June 2024, accessed through the China Judgments Online database.

The judgments document the illegal trade of at least 42,744kg of pangolin scales and 5,465 whole pangolins across 139 instances. All eight recognised species of pangolins were recorded in illegal trade in China, with the Sunda, giant and white-bellied pangolin figuring highest in terms of instances of illegal trade where species identification was provided. African species were seized more frequently and in higher volumes of weight than Asian species.

The majority of the judgments reviewed involved the crime of smuggling pangolin specimens to mainland China. Seventeen countries were involved as points of origin or transit in the smuggling of pangolin specimens, with Nigeria occupying the highest position in terms of volume and Vietnam occupying the highest position in terms of number of incidents of smuggling.

The judgments indicate that the illegal trade of pangolins in China is both organised as well as opportunistic in nature. Multiple judgments point to high levels of organisation in both the smuggling of pangolins into China as well as the internal distribution of pangolins within China, which we illustrate through examples and case studies.

Additionally, the judgments reveal that Chinese authorities appear to have advanced capabilities for the investigation and prosecution of pangolin crime. Evidence in the form of digital records, banking records and forensic identification of specimens were routinely presented and examples illustrate that complex investigations have been conducted. The judiciary has also played an important role in combating pangolin crime.

Notably, several judgments provide a clear link between the smuggling and illegal trade of pangolins scales and their use for medicinal purposes in China. This ranges from potentially small-scale personal use to the laundering of smuggled scales into legal supplies. A number of cases demonstrate the involvement of individuals, sites and companies associated with the medicine business in pangolin crimes and smuggling. This includes the conviction of legal representatives and other employees of pharmaceutical companies for the illegal trade of pangolins.

There is compelling evidence that China's legal domestic market for pangolin medicine products has contributed to global illegal trade and poaching of pangolins.

We therefore recommend *inter alia* that China closes its legal domestic market for pangolin medicine products and carries out targeted, evidence-led campaigns to reduce demand for pangolin specimens, in line with CITES recommendations.

Given the scale of trade, we also recommend *inter alia* that the CITES Standing Committee examines whether the contribution of this legal market to the global illegal trade of pangolins deserves attention as a compliance matter affecting the implementation of the Convention.





RECOMMENDATIONS

WE RECOMMEND THAT CHINA:

- Closes its legal domestic market for pangolin specimens by prohibiting all trade of pangolin scales for commercial purposes including TCM
- Conducts targeted, evidence-based campaigns with the Chinese medicine industry, user groups and the public to reduce demand for pangolin specimens and encourage the use of substitutes which do not endanger other wildlife
- Enhance co-operation with the source and transit countries named in this and other reports to prevent, detect, investigate and prosecute illegal smuggling of pangolins into China.
- Parties to CITES have recommended that legal domestic markets for pangolin specimens which contribute to poaching and illegal trade should be closed.

It is clear that over the past decade or more, there has been smuggling of pangolin specimens in large quantities to China from several range and transit countries. There is compelling evidence that China's legal domestic market for pangolin scales has contributed to this trade in both direct ways, such as the laundering of illegally sourced pangolin scales, and indirect ways by sustaining demand for pangolin scales. Since this has contributed to violations of the Convention in the form of large-scale illegal international trade, it should not be treated

WE RECOMMEND THAT THE CITES STANDING COMMITTEE:

- Examines whether the contribution of China's legal domestic market to the global trafficking of pangolin scales deserves attention as a compliance matter affecting the implementation of the Convention.
- Requests China to clarify what has happened to the specimens equating to 29,117 whole pangolin equivalents imported from the Congo and Burundi in apparent violation of the Convention in 2017 after the listing of all pangolin species on Appendix I took effect.

LASTLY, GIVEN THE USE OF FLIGHTS, SHIPS, COURIERS, BUSES AND OTHER METHODS TO SMUGGLE AND TRANSPORT PANGOLIN SPECIMENS, WE RECOMMEND THAT PRIVATE SECTOR TRANSPORT OPERATORS:

- Enhance screening and security measures on the routes identified in this and other reports to detect consignments of pangolins and other wildlife.



BACKGROUND

All eight recognised species of pangolin face high risks of extinction, with the primary threats to their survival being poaching and trade of their meat, body parts and scales.

The Sunda, Chinese and Philippine pangolins are assessed as critically endangered;¹ the giant, white-bellied and Indian pangolins are assessed as endangered;² and the black-bellied and Temminck's pangolins are assessed as vulnerable.³

Despite pangolins having diverse distribution throughout forest, savannah, grassland and shrubland across West, Central, East and Southern Africa, as well as South, South-East and East Asia, estimates of their populations are unknown and knowledge about their biology remains limited, complicating any accurate assessments of their decline or recovery.

In order to address declining pangolins populations, increasingly stringent measures for protection of the species have been adopted both through the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and at national levels.

However, pangolins have been traded illegally in very large quantities over the past decade. Between 2016-24, seizures involving at least 553,042 pangolins took place in 49 countries.⁴ In terms of the number of animals involved, scales were the most illegally traded part of the animals, accounting for almost 99 per cent of trafficked quantities.⁵

During the past decade or more, China, which continues to allow legal domestic trade in pangolins for medicinal purposes, has been the primary destination for both legal and illegal international trade of pangolins.

The judgments of Chinese courts in cases involving pangolin crimes provide a valuable source of information about the illegal trade in pangolins as well as enforcement responses to it. In this report, we review 169 Chinese court judgments involving pangolins from the period 2014 to June 2024, with a view to better understanding the nature and dynamics of illegal trade, the sources of specimens and trade routes involved and the capabilities of investigating and prosecuting authorities.

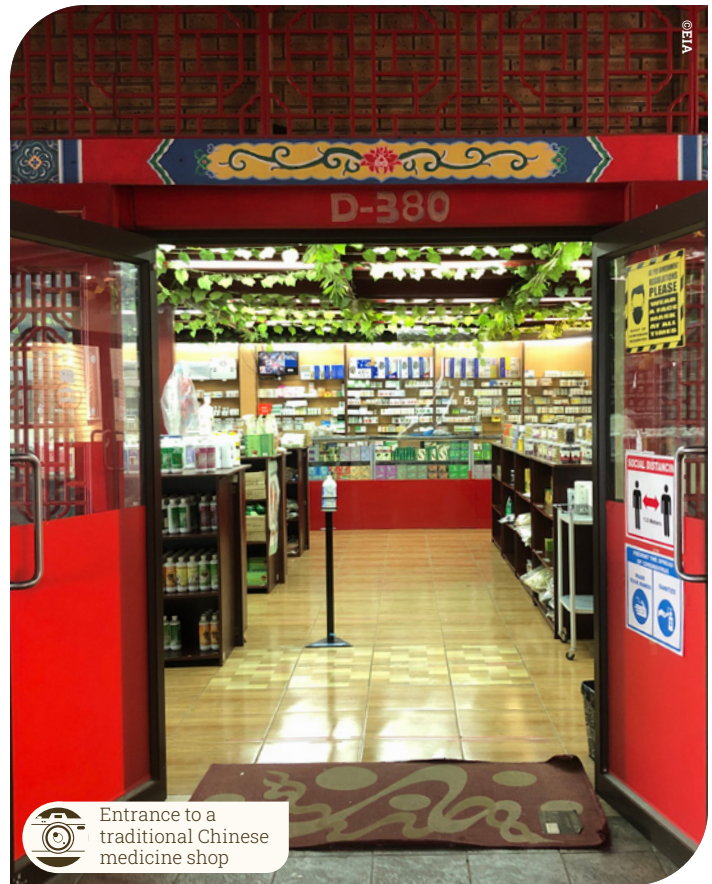
We also look at the end uses of pangolins and assess whether continuing legal domestic trade of pangolins fulfils CITES recommendations.



CHINA'S ROLE IN THE ILLEGAL TRADE OF PANGOLINS

There has been a long and well-documented history of use of pangolins in China, mainly for food and medicinal purposes.⁶ The use of pangolin scales as an ingredient in traditional Chinese medicine (TCM) dates back to at least 480AD.⁷

Declining populations of pangolins in Asia due to overexploitation driven by TCM and other uses has seen pressure increase on African species as a source of scales for TCM. From 2013-17, approximately 13 tonnes of wild-sourced African pangolin scales were legally exported from four African countries, primarily to China.⁸



Analysis of seizure data and other sources of information such as scientific literature clearly shows that China is the main destination country for the illegal international trade of pangolins and the primary consumer country of pangolins.⁹ Vietnam, which is the other major destination and consumer country for pangolins, is also an important transit country for the smuggling of pangolins into China.

There have been various analyses of illegal pangolin trade over the past decade. While estimates vary based on the exact period and the sources of information used, they uniformly indicate that the scale of illegal trade linked to China is large, either in terms of the weight of the pangolin specimens seized or conversions into whole pangolin equivalents.

In the decade from 2015-24 inclusive, EIA recorded a minimum of 160,000kgs of pangolin scales reported as seized in connection to China, either by seizure location, destination or the nationality of persons involved.¹⁰

Using data from the CITES Illegal Trade Database and responses provided by countries, the CITES Secretariat, in partnership with the IUCN (hereafter the CITES Secretariat's CoP20 report), estimates that from 2016-24, China was the destination for seizures involving 92,844 pangolins.¹¹

Based on an analysis of 390 Chinese court judgments involving pangolins from 2010-23, Fei Xi *et al* estimate that the number of illegally traded pangolins in China was 136,301.¹² These figures, of course, represent only numbers in detected and reported illegal trade and the actual numbers in illegal trade are likely to be far higher.

Illegal trade routes into China involve several countries around the world but particularly in West, Central and East Africa and South-East Asia. For 2016, based on China's annual illegal trade report, the CITES Secretariat's CoP20 report mentions the main countries of origin as Cameroon, the Republic of the Congo (the Congo), Ethiopia, Equatorial Guinea, Ghana, Malawi, Mozambique, Nigeria, South Africa, Malaysia, Myanmar and Vietnam.¹³ Based on routes discerned from other reported seizures, the CITES Secretariat's CoP20 report also mentions Sierra Leone, Belgium, Laos, Liberia, the Democratic Republic of the Congo (DR Congo), France and Thailand as countries of origin or transit for illegal pangolin specimens destined for China.¹⁴ In addition to these, Fei Xi *et al* mention Indonesia, Philippines, Dubai, Pakistan and Nepal as also being involved in illegal trade of pangolins destined to China, based on their analysis of Chinese court judgments.¹⁵

Apart from legal and illegal trade, the CITES Secretariat's CoP20 report notes that specimens equating to 29,117 whole pangolin equivalents were imported from the Congo and Burundi into China for commercial purposes in 2017 after such trade was prohibited by CITES using permits issued before the prohibition took effect.¹⁶ *Prima facie*, such trade appears to have occurred in contravention of CITES.



LEGAL CONTROLS FOR PANGOLINS: CITES & CHINA

Pangolins were first listed on CITES at its inception on the original appendices which came into force in 1975, with the Temminck's pangolin listed on Appendix I and three Asian species – the Indian pangolin, the Chinese pangolin and the Sunda pangolin – listed on Appendix II.¹⁷



The genus *Manis* was listed on Appendix II of CITES in November 1994.¹⁸ In 2000, in light of declining populations due to trade, the three recognised Asian species of pangolins at the time were subject to a zero export quota for wild-sourced specimens for commercial purposes, effectively prohibiting international commercial trade in these species.¹⁹ In 2016, recognising the devastating impact of trade on pangolin populations, all eight recognised species were included on Appendix I of CITES, thereby prohibiting international commercial trade in all pangolins from January 2017.²⁰

In parallel with the listing of pangolins on Appendix I, the Parties to CITES also adopted a pangolin-specific conference resolution, Resolution Conf. 17.10 on the *Conservation of and trade in pangolins* in 2016 *inter alia* containing recommendations to address the threat of trade to pangolins. In 2022, Parties included a recommendation in paragraph 1.d) of this resolution urging countries in whose jurisdiction there is a legal domestic market for pangolins that is contributing to poaching or illegal trade to take all necessary legislative, regulatory and enforcement measures to close such markets.²¹ The resolution also recommends consumer States where necessary and appropriate, to remove references to parts and derivatives of pangolins from the official pharmacopoeia and include acceptable substitute products that do not endanger other wild species.²²

In China, the Chinese pangolin was given protection as a species subject to Category II Special State Protection in 1989.²³ Pangolin species occurring in China continued to be treated as Category II Special State Protection species until 2020.²⁴ In 2024, China reported to CITES that all species of pangolins had been given protection as Category I Special State Protection species since June 2020.²⁵

In 2022, China amended its Wildlife Protection Law (WPL) to introduce a ban on trade of most terrestrial wild animals, including pangolins, for the purpose of consumption as food.²⁶ However, the WPL continued to provide for permissions to be issued for species under special state protection to be bred, traded and utilised for captive breeding, public exhibition, cultural relics protection and other undefined special circumstances.

The lack of clear definitions for key terms such as “utilisation”, coupled with the exemption for “other special circumstances”, provides scope for species with the highest level of protection to be bred and utilised for any potential purpose.²⁷

Since 2007, commercial trade in pangolin products in China has been permitted and regulated under the China National Wildlife Mark scheme.²⁸ In 2023, EIA documented a minimum of 53 TCM products stated to contain pangolin scales available for sale online on Chinese websites, licensed by the National Medical Products Administration of China.²⁹

Since 2024, China has taken further specific measures on the medicinal use of pangolins including: i) removing 13 formulae which include pangolins from the 2025 edition of the Chinese Pharmacopoeia (although this does not affect the production of licensed products based on previous versions of the pharmacopoeia);³⁰ ii) excluding insurance coverage for pangolin medicines;³² and iii) reducing the sanctioned amount for annual consumption of pangolin scales to 1 tonne. While these measures represent progress in protecting pangolins from trade, it is clear from China's own submissions to CITES that it continues to operate a significant legal domestic market for pangolin based medicines and treatments.



JUDGMENTS AS A DATA SOURCE, STRENGTHS AND LIMITATIONS

For the purpose of this report, we have accessed and reviewed 169 judgments from Chinese courts dated between 2014 and June 2024 (the Period) dealing with crimes involving pangolins. A full list of these judgments with citations is provided in Annex 1.

These judgments were accessed and downloaded from the “China Judgments Online” database (<http://wenshu.court.gov.cn/>) in June 2024. The most recent judgment in the dataset is from April 2024. The judgments do not include cases from Hong Kong SAR of China (hereinafter Hong Kong SAR), which has also been highlighted as a hotspot for illegal pangolin trade.³³

In total, our search of the database resulted in 188 judgments containing the word pangolin. After removing duplicates and cases which did not clearly involve crimes relating to pangolins, we were left with 169 judgments. We found that multiple judgments involved the same set of facts – for example, appeals or separate prosecutions of different offenders based on the same seizure. In order to avoid double counting, we have grouped these judgments into “instances” – a term which used in this report connotes a unique set of facts involving an offence relating to pangolins. In total, the 169 judgments related to 139 instances of pangolin crime as set out in **Annex 1** on page 21.

STRENGTHS

1. The facts in each judgment have been established through a judicial process and therefore represent the most accurate information it is possible to obtain regarding illegal trade of pangolins in China.
2. By its nature, the judicial process provides details which are not easily ascertained from other sources of information. This includes information about the motives and the role of different actors in the trade chain. Case studies from judgments can illuminate and provide corroboration of broader trends and observations from other sources of information such as seizure reports.
3. China has made the illegal trade data in its Annual Illegal Trade Reports to CITES unavailable for global research from 2017 onwards.³⁴ The court judgments reviewed in this report are therefore one of the few publicly accessible and reliable sources of information on illegal trade of pangolins in China.

LIMITATIONS

1. We are not aware of what proportion of judgments are uploaded to the database. Judgments also appear to be periodically removed from the database³⁵ and search results therefore appear to depend on when searches are conducted. There have also been reports that the database may be closing.³⁶ Fei Xi *et al* retrieved 390 judgments for the period 2010-23 from the database from their search.³⁷ We therefore caution against viewing the dataset as in any way a complete in terms of court cases in China relating to pangolins for the Period.
2. Reported seizures only include cases in which successful detection of illegal trade has taken place and are generally considered to represent a small fraction of actual illegal trade. The cases we have been able to access represent instances in which the entire process of detection, investigation, prosecution and conviction have been completed. They are therefore even less representative of the scale of illegal trade. The figures from the dataset therefore represent the barest minimum, i.e., the very tip of the iceberg in terms of quantities of illegal trade that has occurred during the Period.
3. There is a time lag between a detected instance of illegal trade and a court judgment on those facts. As a result, while the judgments in the dataset mostly relate to illegal trade within the Period, there are a few instances from before the Period. Another consequence of the time lag is that illegal trade which has been detected during the later stages of the Period will not be properly reflected in the judgments as those court proceedings are unlikely to have been concluded.



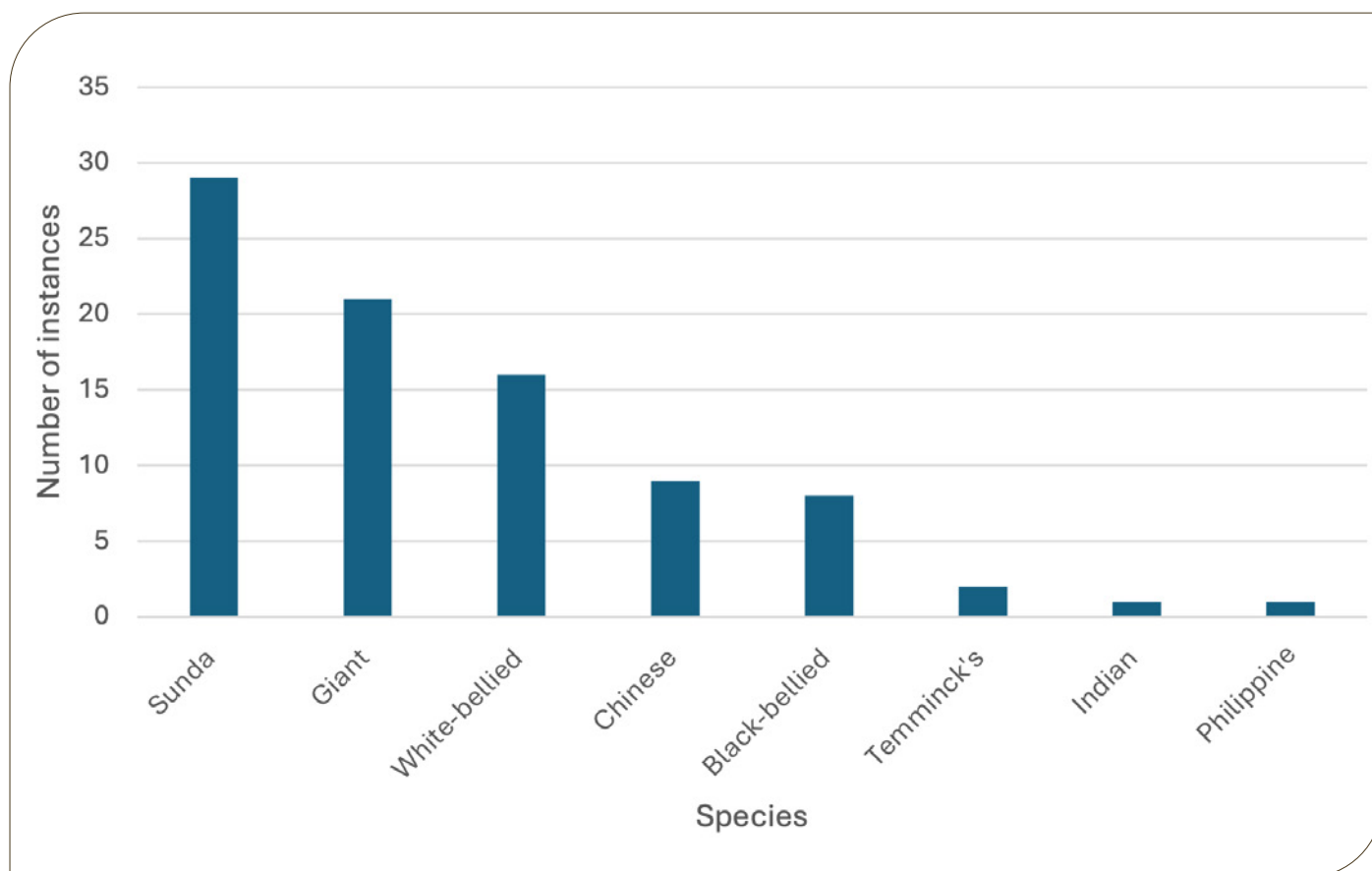
OBSERVATIONS FROM THE JUDGMENTS

VOLUMES

The judgments document the illegal trade of at least 42,744kg of pangolin scales and 5,465 whole pangolins across 139 instances. Most of these incidents occurred during the Period with only six instances involving seizures that occurred prior to 2014. The total amount of pangolin specimens illegally traded during the Period documented in the judgments is at least 42,434kg of pangolin scales and 5,057 whole pangolins. These values include cases in which no seizure or small seizures occurred, but where illegal trade was proven in higher quantities through other means. Two such instances recorded no apparent seizure, but investigations found the volume of scales illegally traded amounted to 13,343kg.

A total of 62 of the 139 instances provide species-level identification of the seized pangolins. All eight recognised species of pangolins were recorded as seized. Since there are instances of mixed scales reported as being seized without a further breakdown of the exact weight for each species, we have not attempted to make a comparison in terms of weight of each species seized. However, in terms of instances of seizures where species identification was provided, pangolin species occurred in the following order: Sunda (29); Giant (21); White-bellied (16); Chinese (9); Black-bellied (8); Temminck's (2); Indian (1); and Philippine (1). Of these instances, a total of 19 seizures were reported as a mix of up to four species as follows: African (7); Asian (6); and mixed African and Asian (6).

Fig 1: Pangolin species found in illegal trade by number of instances as per the judgments



It is worth noting that the CITES Secretariat's CoP20 report estimates 43,775 whole pangolin equivalents seized in China based on its annual illegal trade report for 2016 alone. Fei Xi et al estimate a total of 136,301 illegally traded pangolins from 2010-23 based on their larger dataset of judgments.

The volumes reported by us and others represent a fraction of illegal trade since they only take detected or prosecuted cases into account. What is clear is that by any measure, there has been illegal trade of pangolins in large quantities into and within China over the last decade or more.



SOURCES AND ROUTES

In many cases, it is difficult to establish the exact source of pangolin scales in illegal trade. This is because countries such as Nigeria, Ethiopia, and Vietnam, which are range States for pangolins, are also transit points where pangolin scales from other countries are accumulated or pass through on their way to China. This has been noted in other reports³⁸ and is evidenced in the judgments. For instance, there are cases where African pangolin scales have been smuggled into China from Vietnam³⁹ and where scales of white-bellied and giant pangolins have been smuggled into China from Ethiopia,⁴⁰ which is not a range State for these species. There have also been seizures of African pangolin scales in China which, based on the circumstances of the case, are likely to have been smuggled into the country from Myanmar.⁴¹

In all, the judgments confirm that pangolin specimens were smuggled into or destined for China from or through the following 17 countries:⁴² Cambodia (1 instance), DR Congo (1 instance), Ethiopia (23 instances), Equatorial Guinea (13 instances), Indonesia (5 instances), Italy (1 instance), Malaysia (1 instance), Myanmar (20 instances), Nigeria (11 instances), Pakistan (1 instance), Philippines (1 instance), Republic of Guinea (2 instances), Qatar (3 instances), Singapore (1 instance), South Korea (1 instance), UAE (3 instances), and Vietnam (38 instances).

In the case of Singapore and DR Congo, the pangolin specimens were intercepted in Singapore based on information shared by the Chinese authorities. In addition to this, there were eight instances where scales were smuggled into China from unknown countries. There were 10 instances where scales were smuggled into mainland China via Hong Kong SAR.



Fig 2: Pangolin smuggling routes into China as per the judgments. Thicker arrows indicate higher frequency (not volume).

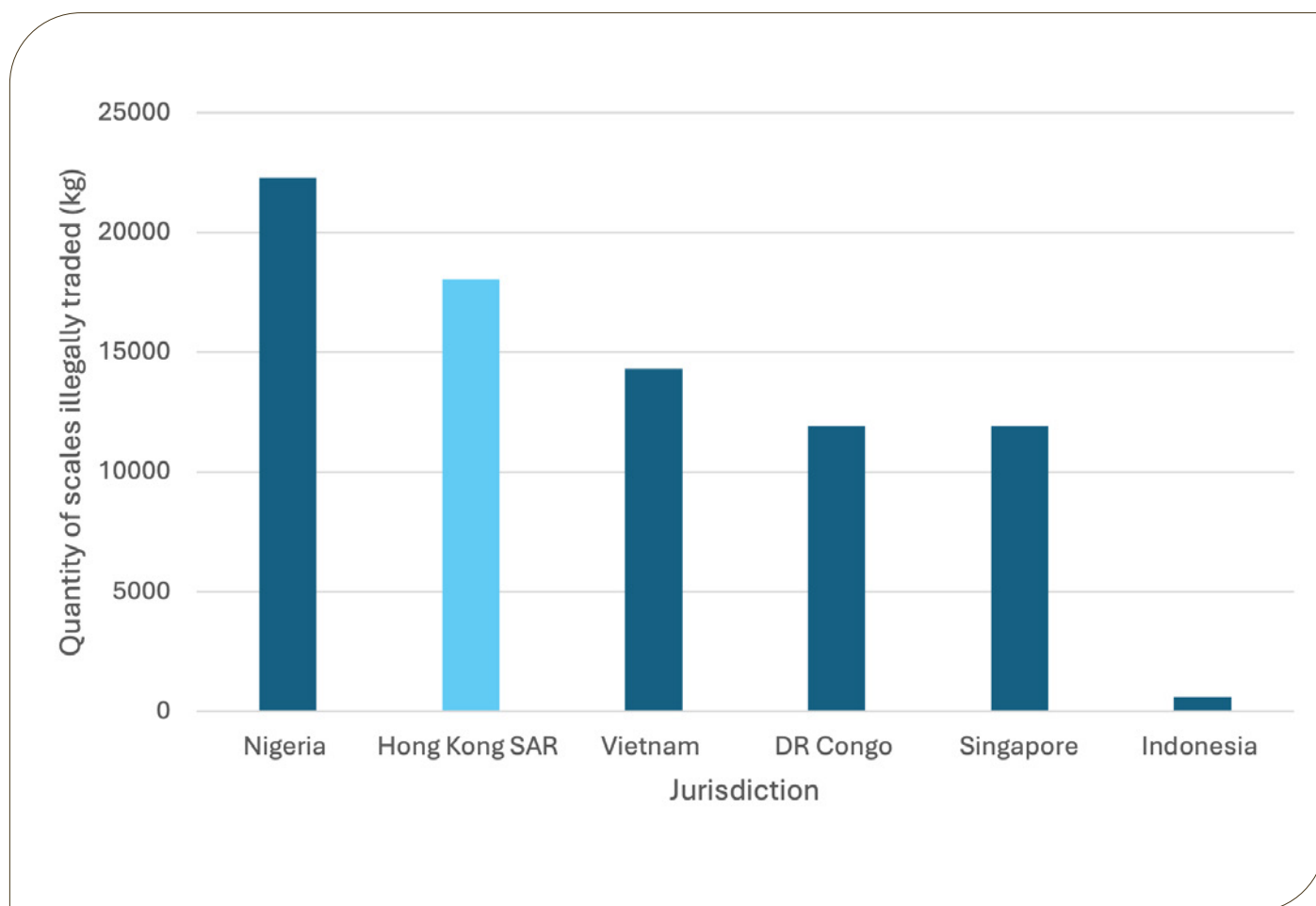
Map made with Maply

Disclaimer: The boundaries shown and designations used in the map are for representation purposes only and do not imply endorsement of or a position on them



Where quantities of scales illegally traded were reported in the judgments, the most significant volumes involved the following five countries: Nigeria (22,303kg), Vietnam (14,310kg), DR Congo (11,912kg), Singapore (11,912kg) and Indonesia (600kg). In addition, a total of 18,057kg of pangolin scales were smuggled through Hong Kong SAR into mainland China. These figures include overlaps in instances of illegal trade where more than one country was implicated.

Fig 3: Jurisdictions associated with the highest volumes of illegally traded pangolin scales to mainland China as per the judgments



Overall, 101 of the 139 instances or 72 per cent of illegal trade described by the judgments involve pangolin scales being smuggled into mainland China from abroad or Hong Kong SAR.

While the judgments are not exhaustive or representative of all pangolin crime in China, this is still a significant proportion in so far as the judgments are comparable among themselves. In addition to these, there are a further six instances in which, based on the circumstances of the case, the judgments indicate a likelihood of pangolin specimens having been smuggled into China from Myanmar and a further five instances from Vietnam. These are cases in which the nationality of the defendant or other circumstances such as the location of the seizure indicate a link to these countries.

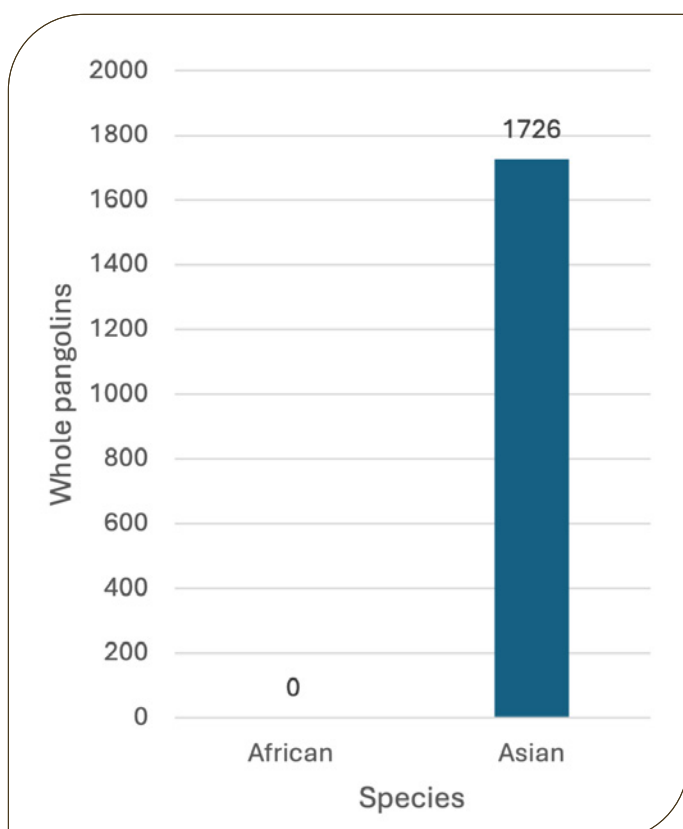
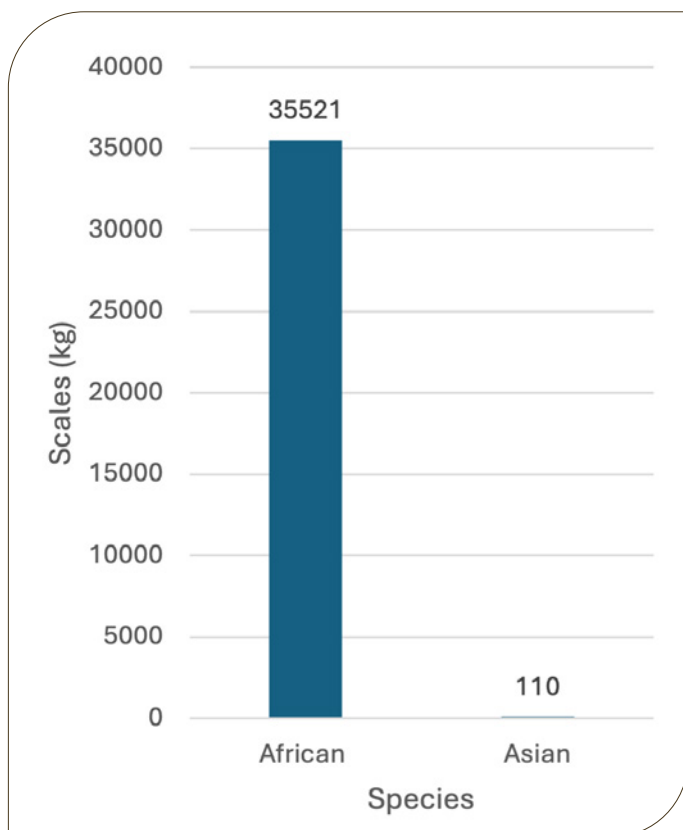
While it may not be possible to determine the exact source country of seized pangolin specimens, it is possible to make some observations in terms of African and Asian pangolins in illegal trade in China. In order to do this, we have assumed that i) live pangolins seized in smuggling cases are of Asian species (as they are unlikely to survive long transits using methods of concealment); and ii) pangolin specimens smuggled from African countries are of African species unless otherwise specified. We have otherwise depended on the species identification provided in the judgments.

A total of 42 instances involve the illegal trade of only African species amounting to 35,521kgs of scales and no whole pangolins reported. Some 36 of the 139 instances involve the illegal trade of only Asian species totalling 110kgs of scales and 1,726 whole pangolins. Six instances amounting to 473kgs of scales involved both Asian and African species, comprising of any mix of between two to four of the following species: Chinese, Sunda, white-bellied, black-bellied and giant.

Pangolin scales from African species were more frequently seized and of higher volume by weight in comparison to Asian species, which had larger amounts of whole pangolins, often live, found in seizures.



Fig 4: Volumes of African and Asian pangolin specimens (scales and whole pangolins) illegally traded as per the judgments



Six instances involved the seizure of both Asian and African pangolin scales. One of these is a smuggling case involving a seizure from a shipping container where Nigeria, South Korea and Hong Kong were source or transit countries involved.⁴³ The case indicates that organised illegal traders higher up the trade chain may collect pangolins from different sources depending on availability. The other five cases involving seizures of mixed African and Asian species did not involve prosecution for the offence of smuggling. However, the judgment in one of these cases based on a seizure in May 2023 indicates a strong likelihood that the pangolin scales in question were smuggled into China from Myanmar and that Vietnam was also involved in the trade chain.⁴⁴ This case provides recent evidence that illegal traders higher up the trade chain have access to illegal supply chains for both African and Asian pangolins.

METHODS

The methods of transport employed by smugglers were closely related to the routes used to smuggle pangolins. The use of shipping containers and flights often involved multiple countries across continents. Flights were used to smuggle pangolin specimens in 36 instances. The most prominent route in terms of instances is by flight from Equatorial Guinea to China via Ethiopia (12 instances). There were a further nine instances where pangolin scales were smuggled from Ethiopia to China by flight and in eight of these instances, Ethiopia was a transit point since it is not a range State for the pangolin species which were seized (giant, white-bellied). Flights were also used to smuggle pangolins from Nigeria and Republic of Guinea to China via Qatar and the UAE respectively. Philippines, and Indonesia were the two Asian range states from which flights were used to smuggle pangolin scales into China.



The use of shipping containers to smuggle large quantities of pangolin scales has been well documented.⁴⁵ Seven of the instances described in the judgments involve the use of shipping containers to transport pangolin scales. In five of these, the shipments originated from Nigeria,⁴⁶ with South Korea and Hong Kong being used as transit points in some instances. In the other Africa-related instance, the shipment destined for China originated in DR Congo with Vietnam and Singapore as transit points.⁴⁷ The remaining incident involved the shipment of pangolin scales from Indonesia to China.⁴⁸



Ships were also used in other instances to transport pangolin scales as cargo. One of these was a large seizure of 2,674 frozen pangolins weighing 11,517.4kgs, where the pangolins were transferred from one ship to another on the high seas.⁴⁹ The smugglers would then transfer the pangolin specimens onto smaller fishing boats once back in Chinese waters.

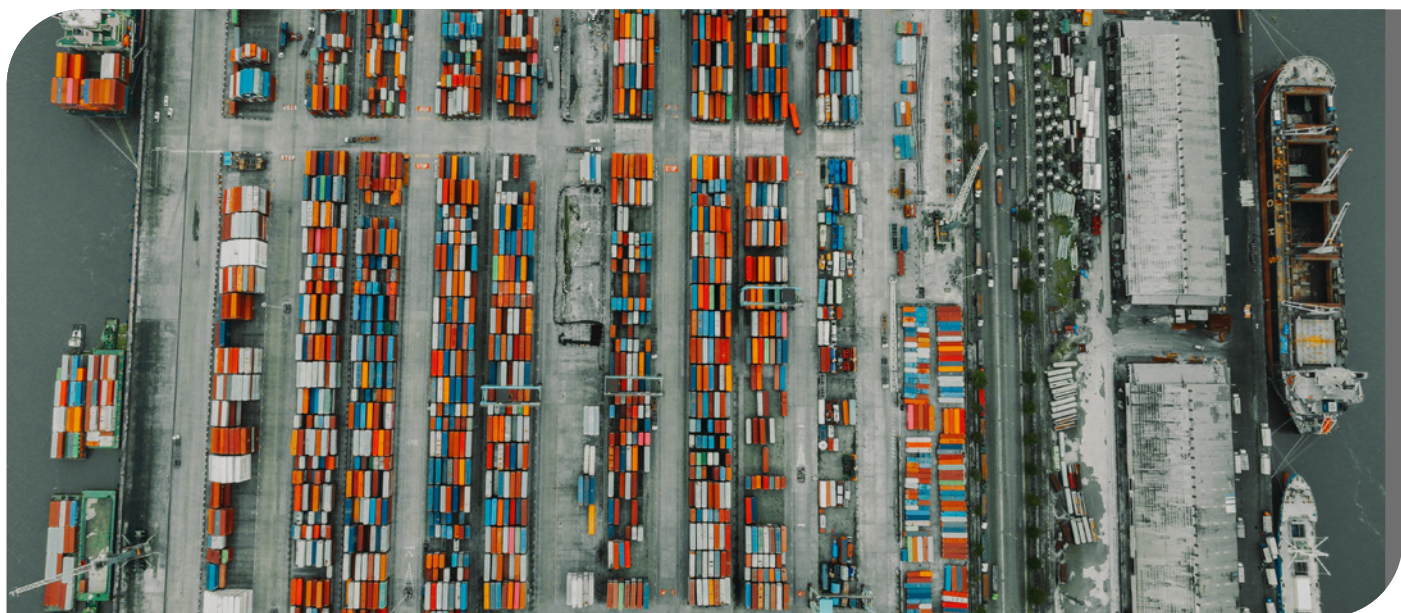
Different types of water-based transport were used in multiple instances to smuggle pangolin specimens from Vietnam to China⁵⁰ and from Hong Kong SAR to mainland China.⁵¹ The biggest hotspot in terms of incidents for pangolin smuggling into China was from Mong Cai in Vietnam to Dongxing in China which often involved transport across the Beilun river. A total of 19 smuggling incidents reported in the judgments occurred in this area,⁵² with a further three cases also likely to have involved smuggling via this route.⁵³ EIA intelligence from 2024 further confirms the Mong Cai-Dongxing border as a key trafficking hotspot involving transportation of wildlife, including pangolins, by truck, speedboat and by foot from Vietnam to China.⁵⁴



Myanmar, which shares a border with China, saw a variety of vehicles used to smuggle pangolin specimens into China, including cars,⁵⁵ trucks,⁵⁶ a tractor⁵⁷ and motorcycles.⁵⁸ The routes and areas between and around Myitkyina in Myanmar and Tengchong in China were a particular hotspot for smuggling, with nine instances reported in the judgments.⁵⁹

Mail was another method of smuggling reported in the judgments with three instances involving Vietnam⁶⁰ and one involving Pakistan.⁶¹ Within China, the most frequently reported method of transporting pangolin specimens was by vehicles such as cars and trucks and express delivery services.





NATURE OF ILLEGAL TRADE: ORGANISED AS WELL AS OPPORTUNISTIC

The judgments indicate that much of the illegal trade in pangolins is organised in nature with supply lines stretching across continents and with distinct roles played by different actors.

The use of shipping containers to smuggle pangolin scales provides an obvious example. Five⁶² of the seven instances where shipping containers were used involved huge volumes of scales sourced from Africa weighing thousands of kilos, two of which were over 10,000kg each.⁶³

The collection, stockpiling and distribution of such large quantities of scales would require access to extensive smuggling networks in both Africa and China. Apart from the traders, agents responsible for customs clearances and other procedures were also involved in the crimes and prosecuted. The scales were concealed in shipments of goods such as sesame, granite, timber and frozen fish and companies were used as consignors and consignees.

The judgments indicate that smuggling of pangolins also occurs in an opportunistic way, with several instances of smaller quantities of pangolin specimens being seized. On the surface, the use of personal baggage to transport pangolin scales by flight appears to be opportunistic in nature. In all but three of the 36 instances in which flights were used, the quantity of pangolin scales seized was less than 100kgs. However, Case No. 172 shows that the smuggling of pangolin scales by flight has also been organised, using travellers as “mules” to transport the scales. In this case, the defendant, who was a Chinese national working in Nigeria, organised the transport of at least 282.775kgs of pangolin scales to China over the course of at least three attempts using other people as carriers to transport the scales in their personal baggage.

The use of mules to smuggle pangolin scales in personal baggage was not limited to flights but was also employed from Hong Kong SAR to mainland China at the Shenzhen Bay Port.⁶⁴

Aside from the use of mules, the involvement of repeat offenders and bribery both point to smuggling of pangolin scales by flight not just being opportunistic in nature. In two instances involving smuggling by flights⁶⁵ the defendants had been previously apprehended attempting to smuggle pangolin scales in their personal baggage, had been released and were caught attempting to do so again.

In another case, a customs officer was convicted for bribery connected to smuggling of pangolin scales by flight from the Philippines.⁶⁶ The court found he had actively conspired with other defendants⁶⁷ to aid the smuggling of pangolin scales and other goods into the country.

Within China, the judgments reveal the organised nature of the distribution networks for illegal pangolin scales, exemplified by two instances involving multiple cases:



THE CARGO INSURANCE CASES

Cases 7, 30, 59 and 87, deal with the operations of a gang which smuggled pangolins from Vietnam and distributed them onwards within China.

Each member of the gang had different roles. The gang set up two unofficial "cargo insurance companies" as vehicles for their business with members having "shares" in these. The pangolins would be smuggled from Vietnam into China by boat or ship over the Beilun river. They were then loaded on modified motorcycles or electric vehicles and transported into Dongxing City.

At Dongxing, the "Dongxing Cargo Insurance Company" would take over and pay a certain amount of money to the "cargo owner" in advance as a deposit. The smuggled pangolins would then be transported to Hepu county, where the "Hepu Cargo Insurance Company" took over and transported the pangolins to designated delivery points in Guangdong Province.

If the delivery was successful, the "cargo owner" paid the freight. If they were lost or seized along the way, the "cargo insurance company" would compensate the cargo owner an amount agreed in advance.

From Dongxing, the pangolins were transported by car and places such as pig farms, snake farms and fish ponds controlled by members or associates of the gang were used as transit points. Although only 24 live pangolins were seized in this case, based on other evidence, the courts found that at least 4,195 pangolins had been smuggled by the gang from Vietnam to China.



THE WAREHOUSE CASES

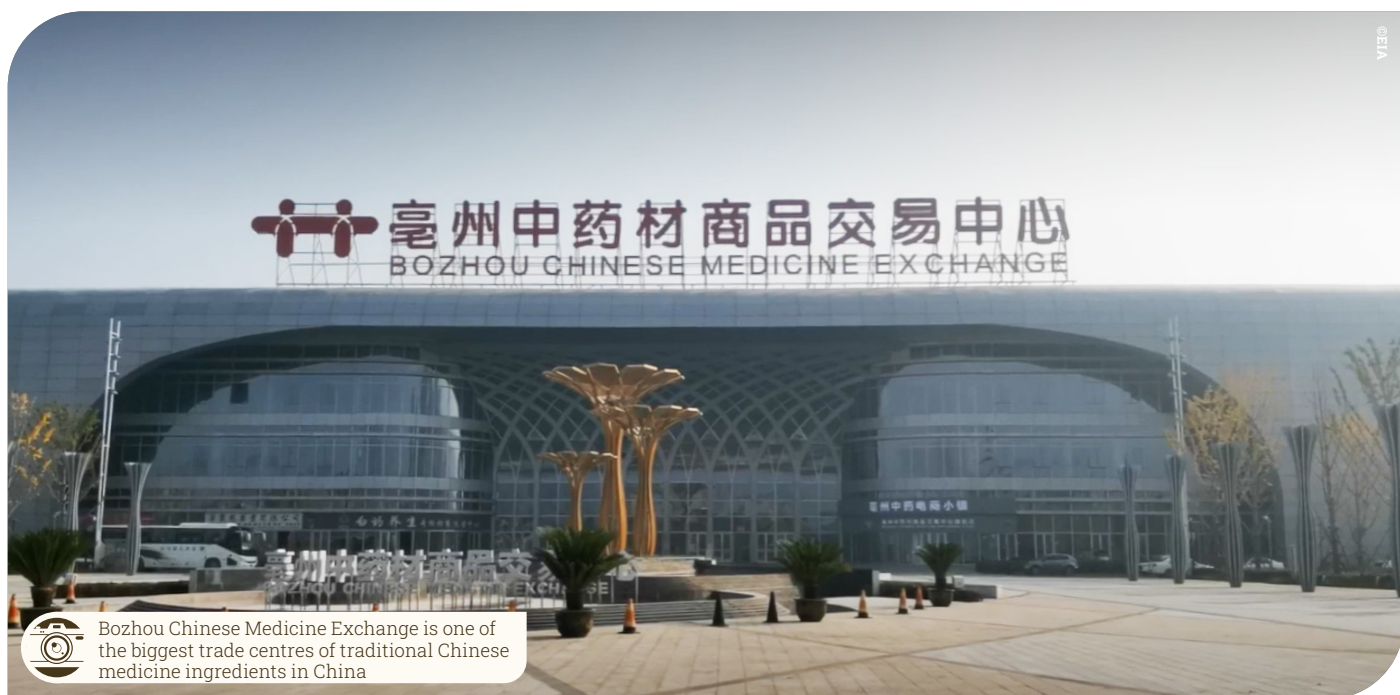
Cases 25, 75 and 97 involve the seizure of a large number of wildlife products from two warehouses, one in Dongxing City and one in Qinzhou City in January 2016.

The primary offender in this instance had been using the Dongxing warehouse since 2010 and the Qinzhou warehouse since 2013 to collect, store and distribute illegal wildlife products. A total of 97 Sunda pangolins were seized from the warehouses along with hundreds of Asiatic black bear paws, Asian elephant skin and meat, lion skulls and bones, tiger meat and other wildlife parts.

Four other defendants convicted in these cases had been hired by the primary offender to rent the Qinzhou warehouse, manage both warehouses on a daily basis and receive, store and deliver wildlife products to customers. Buyers would contact the primary offender and place orders. He would then instruct other defendants to pack the wildlife products and arrange for their transport to the buyer. Buses were used to transport the wildlife products in most instances and deliveries were made to Yixing, Fuzhou, Hunan, Guangdong, Zhejiang, Guangxi and Shanghai.

Payments were made to the bank accounts of the defendants who would then withdraw the money and hand it over to the primary offender. The pangolins had been transported from Vietnam to Dongxing over the Beilun river.





SMUGGLING, ILLEGAL TRADE AND MEDICINAL USE

The primary end uses recorded in the judgments for the illegal trade of pangolins were for medicine and for consumption as food.

A total of 105 of the 139 instances involve the trafficking of scales. A presumption can be made that in these cases, the purpose of illegal trade included use in some form of medicine. Additionally, in the 35 instances when whole pangolins were illegally traded, it is possible that the scales from the animals could have been utilised for medicinal purposes.⁶⁸ In at least 29 of the instances, some form of medicine was specifically mentioned as an end use for the pangolin specimens in question.

The judgments present a varied picture as to how illegally sourced scales are used for medicinal purposes, ranging from potentially small-scale personal use to likely laundering into legal supplies. In at least six⁶⁹ of the instances in which medicinal use was mentioned when pangolin scales had been smuggled into China, the defendant's claimed that the scales were for personal use as medicine. In making this claim, the defendants were pleading for a lighter sentence on the grounds that they did not intend to sell the smuggled scales illegally for a profit. In a few instances, courts accepted these pleas, implying that the perception of and demand for pangolin scales as medicine drives opportunistic smuggling by individuals besides organised crime.

In two instances, seized pangolin specimens which had been illegally smuggled from Myanmar appear to have been transferred to medical companies as part of the legal process. One of these instances relates to an old seizure from 2008, where the seized pangolin scales were auctioned by the Lincang Forest Public Security Bureau to a Chinese medicine beverage processing company.⁷⁰ Pangolins were listed on Appendix II of CITES at the time. In the other instance, six live Malayan pangolins were seized while being smuggled into China from Myanmar by motorcycle in June 2017. The judgment in this case records the seized pangolins as being handed over to a medical technology company.⁷¹ All pangolin species were listed on Appendix I of CITES at the time, which requires a country seizing live Appendix I specimens to offer to return them to the country of export or to place them at an appropriate rescue centre.⁷² The handing over of the live pangolins to a medical company in this instance raises questions of compliance with the Convention.

Fei Xi *et al* highlight Bozhou city as an important transit point for the illegal trade in pangolins, likely due to the Chinese herbal medicine industry in the city.⁷³ Bozhou is well known for its TCM market, recognised as China's largest TCM production and trading hub.⁷⁴ The judgments record it as a destination for illegal trade of pangolin scales smuggled from Pakistan,⁷⁵ Nigeria⁷⁶ and Vietnam.⁷⁷

There are multiple instances of individuals involved in the Chinese medicine business in Bozhou being convicted for smuggling and illegal trade of pangolin scales.⁷⁸ The following instances illustrate the role played by the Bozhou TCM market in the illegal trade of pangolins:



ILLEGAL TRADE BY LICENSED TRADER⁷⁹

In 2015, pangolin scales and other wildlife parts were confiscated from Bozhou Medicinal Materials Trading Centre.

The defendants, who ran a pharmaceutical company, had a wildlife and product business utilisation license and an approval issued by the Anhui Provincial Forestry Department.

The licenses issued to the company allowed it to deal in pangolins and other wildlife. The defendants argued that since they had a license, the seized pangolins should be excluded from consideration for the purpose of sentencing. The court found that they had not applied for approvals based on the legal origin of specific batches and that the pangolin scales had therefore been illegal sourced.



SMUGGLING BY LEGAL REPRESENTATIVE OF PHARMACEUTICAL COMPANY⁸⁰

Three large seizures of pangolin scales from shipping containers originating in Nigeria amounting to a total of 6,848.36kgs took place in 2018.

The containers were seized in Yunfu New Port and Guangzhou Nansha Port concealed among granite rough boards. Defendant A in this case had been in charge of sourcing the pangolin scales from Africa and had made trips to Ghana, Ethiopia, Nigeria, Egypt and Qatar. Defendant B was responsible for customs declarations, customs clearance and other import procedures. Defendant C was the legal representative of a pharmaceutical sales company located in Bozhou city. The court found that Defendant C had conspired with Defendants A and B to smuggle pangolin scales from Africa to China for sale for profit. Defendant C had remitted more than three million RMB to Defendant A to source the scales from Africa.



SOURCE OF ILLEGAL SCALES IN OTHER MARKETS⁸¹

In 2020, the operators of a medicinal materials store located in medicinal materials wholesale market in Lianqiao Town in Shaodong were convicted for illegal trade of pangolin scales.

From 2017-19, the operators of this store had illegally purchased processed pangolin scales (also known as “Jiazhu”) from illegal traders in Bozhou city and also in Foshan city. These illegally sourced pangolin sales were then sold on to other buyers.



Aside from Bozhou, the judgments record illegal pangolin specimens in trade in other parts of China associated with the medicine business such as a medicinal herb store, a pharmacy,⁸³ a health management company⁸⁴ and a warehouse in a medicinal materials market.⁸⁵ In one instance,⁸⁶ a 2018 seizure of pangolin scales was initially investigated as a counterfeit drug case by the district food and drug administration. The defendant in this case, from whose house the pangolin scales were confiscated, had been processing pangolin scales for medicinal purposes for payment. Aside from the wildlife offence, the case was also dealt with as a case of manufacturing and selling counterfeit drugs. In another instance involving the prosecution of illegal traders of pangolins for food and medicinal use, one of the purchasers of pangolins from these illegal traders was a pangolin breeding centre which had obtained a “National Key Protected Wildlife Domestication and Breeding Permit”.⁸⁷

Outside of the judgments reviewed for this report, other judgments and information about legal cases in Chinese media provide further compelling evidence of the link between legal medicinal use and illegal trade of pangolins. In October 2020, it was reported that the former director of the Beijing Wildlife Conservation and Nature Reserve Management Station had been sentenced for soliciting and accepting bribes to enable Chinese medicine companies to obtain permits to sell wildlife derivatives, including pangolin scales, to hospitals.⁸⁸

An EIA investigation previously linked a pharmaceutical company in Beijing to wildlife traffickers in Uganda and several employees of the company were convicted in 2021 for illegal purchase of at least 9.9 tonnes and illegal sale of at least 7.4 tonnes of pangolin scales.⁸⁹

In June 2021, it was reported that another pharmaceutical company had been fined two million RMB and its executives sentenced for using forgery and fraud to launder tens of thousands of kilos of illegally acquired pangolin scales and saiga horn between 2016-19.⁹⁰

In May 2024, a licensed pharmaceutical company was fined RMB 30.4 million for illegally procuring significant amounts of pangolin scales and saiga horn for TCM manufacture and distribution and its executives and legal representative received prison sentences.⁹¹ The first instance trial established that the company had reported false inventory to obtain approval to manufacture products and then illegally purchased a total of 34,218.14kg of pangolin scales despite only being approved to use 3,424.6kg. The company subsequently sold its pangolin and saiga products to more than 500 hospitals.

ENFORCEMENT AND PROSECUTION CAPABILITIES

Based on the judgments, it is evident that Chinese authorities have advanced capabilities for investigation and prosecution of offences involving pangolins and other wildlife.

In general, evidence collection and presentation included witness testimony, digital records from phones, computers and other devices including communications over messaging services such as WeChat, identification and valuation of seized specimens including species-level identification of pangolins in many cases and banking records and other evidence to show financial flows.

The use of these capabilities is evident from cases in which no seizure or small seizures have taken place, but the prosecution has been able to prove much larger illegal transactions of pangolin specimens based on other evidence.

A prime example of this is the cargo insurance cases⁹² detailed earlier. In that instance, despite only 24 live pangolins having been seized, the prosecution produced evidence in the form of WeChat and phone records, seized notebooks, bank records and witness statements to prove that 4,195 pangolins had been smuggled by the defendants from Vietnam.

In another instance, although only seven live pangolins were confiscated, the court, based on other evidence such as WeChat records, found that the five defendants in the case had variously illegally traded or transported a minimum of 6-51 pangolins.⁹³ In one instance it is unclear whether any seizure occurred, but the court used evidence in the form of express delivery records and WeChat records to find that the defendant had been sent pangolins by mail from Pakistan eight times.⁹⁴

There are several instances in which authorities have prosecuted buyers, sellers and transporters involved in illegal trade. Some of these show that authorities have conducted complex investigations and prosecuted several members and associates of organised groups involved in smuggling of pangolin specimens.





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Aside from the instances highlighted earlier, the following example shows enforcement action involving multiple connected instances and cases:

VIETNAM-CHINA NETWORK⁹⁵

This network involved the illegal trade of a minimum of 1,113 whole pangolins, of which 222 were seized by law enforcement.

Each member of the network had dedicated roles covering overseas sourcing, smuggling, storing and transporting within China. Investigations into these 14 interconnected cases determined illegal trade activity from 2017-19, resulting in the conviction of 22 individuals linked to this network.

Live Sunda pangolins were smuggled from Vietnam into Dongxing, China via the Beilun River, coordinated by Chinese and Vietnamese nationals. Following receipt of the pangolins in Dongxing, they would be transported by car to storage facilities. These storage locations included a residential home in Dongxing City, Guangxi and an aquatic animal store in Jiaoling County, Guangdong Province, owned and operated by other members of the network.⁹⁶ After the pangolins were processed and packed, they would be transported again by car to clients within China, namely in Guangxi and Guangdong. The network used WeChat for correspondence. Payment was made mainly using cash in hand, with bank transfers used seldomly.

Live pangolins were sold to buyers mainly for meat consumption and use of scales for medicine. One buyer based in Yangjiang, Guangdong purchased live pangolins from the network to slaughter and sell as meat.⁹⁷ Other buyers based in Jiangmen City, Guangdong purchased live pangolins to sell on to other clients.⁹⁸ Two network members claimed during interviews that they would also purchase dead pangolins to sell their scales to clients for medicine.⁹⁹

The judgments provide one excellent example of international cooperation by the authorities in China with counterparts in Singapore, which deserves to be highlighted:

INTERNATIONAL COOPERATION¹⁰⁰

This case involved the organised illegal trade of pangolin scales and ivory from DR Congo between 2017-19.

This network involved both Chinese and Vietnamese nationals who sourced pangolin scales and ivory in DR Congo, using a warehouse in Kinshasa for stockpiling.

In May 2019, the Anti-Smuggling Bureau of Nanning Customs learned that a large amount of pangolin scales and ivory were to be shipped from DR Congo to Vietnam via Singapore. Following bilateral intelligence sharing and coordination, Singapore Customs and the National Parks Board in July inspected three containers declared as timber originating from Matadi Port in Kinshasa, bound for Haiphong City, Vietnam, resulting in the interception of 11,912kg of pangolin scales and 8,795kg of ivory hidden amongst timber.

Subsequent forensic testing determined the seized scales were derived from giant pangolins, which the court equated to approximately 1,805 individuals. Owing to the successful cooperation between Chinese and Singaporean authorities, eight individuals were arrested and convicted.



Above, left: Dongxing Port by the Beilun River, a gateway for smuggling pangolin scales between Vietnam and China



Above: Pangolin scales from DR Congo seized in Singapore as a result of cooperation between China and Singapore





CONCLUSION AND RECOMMENDATIONS

The judgments show that during the Period, Chinese enforcement and prosecution authorities have made significant efforts to combat the illegal trade in pangolins. They also shine a light on the role of the judiciary, which has been highlighted by others as key in pangolin protection efforts in China.¹⁰¹

Efforts to detect and prosecute pangolin crime, however, can only go so far in addressing China's role in the global trade of pangolins. Even in successful instances of detection and prosecution of smuggling, illegal pangolin specimens have entered the domestic market in China.¹⁰² Measures to reduce and eliminate demand for pangolin scales in China are therefore crucial for the global survival of pangolin species.

The judgments make clear that during the Period, pangolins have been smuggled into China from around the world in large quantities, with both Asian and African pangolin species being targeted. They show that the smuggling of pangolin scales into China is organised, involving criminal syndicates, but may also occur opportunistically.

The judgments, together with other court cases which have been reported on in Chinese media, offer compelling evidence that China's legal domestic market for pangolin TCM products has contributed to global illegal trade and poaching of pangolins. This is evidenced in particular by the involvement of licenced pharmaceutical companies and individuals and sites associated with the Chinese medicinal business in illegal trade.

Recent reports suggest that global seizures of pangolin scales may have reduced from sky-high levels in preceding years.¹⁰³ While better enforcement efforts may be one potential reason for this, it is also possible that declining pangolin populations have played a part.¹⁰⁴ Seizures remain significant and there is no information to suggest that pangolins, especially the critically endangered species, can survive current levels of offtake for illegal trade.

While China has taken some important steps towards limiting its legal domestic market for pangolins, it has not closed its legal market for scales for medicinal use. Based on the available evidence, this market is likely to continue to drive demand for pangolin scales and contribute to global poaching and illegal trade of pangolins.



WE THEREFORE RECOMMEND THAT CHINA:

- Closes its legal domestic market for pangolin specimens by prohibiting all trade of pangolin scales for commercial purposes including TCM
- Conducts targeted, evidence-based campaigns with the Chinese medicine industry, user groups and the public to reduce demand for pangolin specimens and encourage the use of substitutes which do not endanger other wildlife
- Enhance co-operation with the source and transit countries named in this and other reports to prevent, detect, investigate and prosecute illegal smuggling of pangolins into China.
- Parties to CITES have recommended that legal domestic markets for pangolin specimens which contribute to poaching and illegal trade should be closed.

It is clear that over the past decade or more, there has been smuggling of pangolin specimens in large quantities to China from several range and transit countries. There is compelling evidence that China's legal domestic market for pangolin scales has contributed to this trade in both direct ways, such as the laundering of illegally sourced pangolin scales, and indirect ways by sustaining demand for pangolin scales. Since this has contributed to violations of the Convention in the form of large-scale illegal international trade, it should not be treated as merely a domestic matter.

WE THEREFORE RECOMMEND THAT THE CITES STANDING COMMITTEE:

- Examines whether the contribution of China's legal domestic market to the global trafficking of pangolin scales deserves attention as a compliance matter affecting the implementation of the Convention.
- Requests China to clarify what has happened to the specimens equating to 29,117 whole pangolin equivalents imported from the Congo and Burundi in apparent violation of the Convention in 2017 after the listing of all pangolin species on Appendix I took effect.

LASTLY, GIVEN THE USE OF FLIGHTS, SHIPS, COURIERS, BUSES AND OTHER METHODS TO SMUGGLE AND TRANSPORT PANGOLIN SPECIMENS, WE RECOMMEND THAT PRIVATE SECTOR TRANSPORT OPERATORS:

- Enhance screening and security measures on the routes identified in this and other reports to detect consignments of pangolins and other wildlife.



ANNEX 1

Fact Situation Number	Case Number	Citation
1	1	(2014)穗中法刑二初字第194号
2	2	(2014)深中法刑二初字第14号
3	3	(2015)东刑初字第1565号
4	4	2015)琼刑二终字第20号
5	5	(2015)厦刑初字第128号
	13	(2015)湖刑初字第416号
	28	(2017)闽刑终111号
6	6	(2015)沪三中刑初字第42号
7	7	(2015)北刑二初字第4号
	30	(2017)桂05刑初35号
	59	(2019)桂刑终305号
	87	(2019)桂05刑初8号
8	8	(2015)珠中法刑一终字第388号
	10	(2015)珠金法刑初字第140号
9	9	(2015)防市刑二初字第48号
	171	(2022)桂06刑初35号
10	11	(2015)二中刑初字第7号
11	12	(2015)谯刑初字第00449号
12	14	(2015)石刑初字第66号
13	15	(2016)沪刑终117号
14	16	(2016)粤刑终1467号
	29	(2017)粤刑终67号
	46	(2018)粤07刑初40号
15	17	(2016)沪03刑初72号
16	18	(2016)粤20刑初78号
17	19	(2016)浙02刑初75号
18	20	(2016)沪03刑初60号
19	21	(2016)沪03刑初68号



Fact Situation Number	Case Number	Citation
20	22	(2016) 沪03刑初50号
21	25	(2016) 桂0702刑初329号
	75	(2019) 桂07刑终280号
	97	(2019) 桂0702刑初172号
22	27	(2016) 云0581刑初307号
23	31	(2017) 沪03刑初98号
24	32	(2017)云05刑初70号
25	33	(2017) 云05刑初155号
26	34	(2017) 皖1602刑初708号
	49	(2018) 皖1602刑初551号
	78	(2019) 皖16刑终269号
27	35	(2017) 云0581刑初537号
	47	(2018) 云05刑终52号
28	36	2017) 云3124刑初75号
29	37	(2017) 粤0904刑初544号
30	39	(2017)浙 06 刑终 162 号
31	40	(2018) 粤08刑初71号
32	41	(2018) 桂06刑初109号
33	42	(2018) 沪03刑初108号
34	43	(2018) 粤20刑初107号
	44	(2018) 粤20刑初73号
	62	(2019) 粤刑终155号
	63	(2019) 粤刑终62号
35	45	(2018) 桂06刑初101号
36	52	(2019) 粤1427刑初101号
	139	(2020) 粤14刑初7号
	125	(2020) 粤14刑初18号
37	54	(2019) 桂刑终180号
	135	(2020) 桂06刑初28号



Fact Situation Number	Case Number	Citation
38	55	(2019) 粤刑终692号
39	26	(2019) 云刑终1273号
	72	(2019) 云28刑初200号
40	57	(2019) 粤刑终1454号
41	58	(2019) 粤刑终1101号
	86	(2019) 粤53刑初9号
	165	(2021) 粤53刑初8号
42	60	(2019) 桂刑终311号
43	61	(2019) 粤刑终1156号
44	64	(2019) 云09刑没2号
45	65	(2019) 粤07刑初77号
46	66	(2019) 苏01刑终1019号
47	67	(2019) 沪03刑初90号
48	68	(2019) 云05刑终153号
	93	(2019) 云0581刑初348号
49	69	(2019) 粤03刑初709号
50	70	(2019) 桂06刑初118号
51	71	(2019) 粤03刑初459号
52	73	(2019) 桂06刑终112号
	96	(2019) 桂0603刑初140号
53	74	(2019) 沪03刑初91号
54	76	(2019) 沪03刑初69号
55	79	(2019) 粤01刑初283号
56	80	(2019) 桂10刑初37号
57	81	(2019) 京04刑初18号
58	82	(2019) 粤03刑初476号
59	83	(2019) 云05刑初121号
60	84	(2019) 京04刑初17号
61	85	(2019) 桂06刑初57号
62	88	(2019) 桂1481刑初144号



Fact Situation Number	Case Number	Citation
63	89	(2019) 川1402刑初429号
64	90	(2019) 桂0681刑初173号
65	91	(2019) 桂0681刑初168号
66	94	(2019)湘0522刑初36号
67	98	(2019)云0581刑初287号
68	99	(2019) 云3124刑初65号
69	100	(2019) 闽0303刑初168号
70	101	(2019)云2822刑初45号
71	103	(2019) 桂14刑初41号
	108	(2020) 桂刑终103号
72	104	(2019) 京04刑初48号
73	105	(2020) 粤16刑初30号
74	106	(2019) 湘07刑终374号
75	107	(2019) 粤07刑初76号
	129	(2020) 粤14刑初7号
76	110	(2020) 桂刑终372号
	123	(2020) 桂06刑初25号
	124	(2020) 桂06刑初54号
77	111	(2020) 粤刑终274号
78	112	(2020) 桂06刑初87号
79	113	(2020) 粤09刑初64号
80	114	(2020) 桂14刑初48号
81	115	(2020) 粤01刑终2013号
82	116	(2020) 京04刑初25号
83	117	(2020) 桂06刑初100号
84	118	(2020) 京04刑初26号
85	120	(2020) 云05刑初141号
86	121	(2020) 桂06刑初88号
87	122	(2020) 京04刑初4号
88	126	(2020) 京04刑初1号



Fact Situation Number	Case Number	Citation
89	127	(2020) 沪03刑初36号
90	128	(2020) 沪03刑初35号
91	130	(2020) 沪03刑初44号
92	131	(2020) 沪03刑初43号
93	133	(2020) 粤01刑终858号
	155	(2020) 粤0114刑初391号
94	134	(2020) 沪03刑初41号
95	136	(2020) 云05刑初115号
96	137	(2020) 粤06刑初7号
97	138	(2020) 沪03刑初33号
98	140	(2020) 苏0102刑初370号
99	141	(2020) 新0103刑初246号
100	142	(2020) 云2932刑初212号
101	143	(2020) 湘0523刑初81号
102	144	(2020) 云0422刑初113号
103	145	(2020) 云0581刑初370号
104	146	(2020) 桂1481刑初71号
105	147	(2020) 云0103刑初197号
106	148	(2020) 浙1102刑初286号
107	149	(2020) 云3103刑初93号
108	150	(2020) 云2627刑初69号
109	151	(2020) 桂0681刑初94号
110	153	(2020) 浙1122刑初101号
111	154	(2020) 桂0681刑初33号
112	156	(2020) 桂06刑初24号
113	157	(2020) 渝01刑初123号
114	158	(2020) 云05刑终194号
115	160	(2021) 粤刑终231号
116	161	(2021) 粤刑终196号
117	162	(2021) 京04刑初12号



Fact Situation Number	Case Number	Citation
118	163	(2021)京04刑初11号
119	164	(2021)闽01刑初17号
120	166	(2021)京04刑初4号
121	167	(2021)粤1403刑初165号
122	168	(2021)桂0681刑初4号
123	170	(2021)内29刑终7号
124	172	(2022)沪03刑初48号之一
125	173	(2019)桂0681刑初173号
126	174	(2022)桂0681刑初3号
127	175	(2022)辽0112刑初350号
128	177	(2023)陕刑终168号
129	178	(2023)皖刑终23号
130	179	(2023)浙07刑终549号
131	180	(2023)浙0727刑初188号
132	181	古某飞走私珍贵动物制品案——境外投案认定自首的实质把握和证据审查. (2023). 人民法院案例库.
133	182	(2021)鲁02民初69号
134	183	(2023)云3123刑初516号
135	184	(2023)云3102刑初402号
136	185	(2023)云3324刑初58号
137	186	(2023)粤1223刑初80号
138	187	(2024)云0523刑初98号
139	188	(2020)京04刑初25号刑



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40. Case Nos. 21, 57, 74, 126, 127, 130, and 131.
41. Case Nos. 185 and 187.
42. Explanation: It should be noted that for the purposes of these calculations, instances and volumes overlap as some countries are transit points. For example, Ethiopia was named in the judgments as a point of transit in 12 of the 13 instances where scales smuggled into China from Equatorial Guinea. For the purpose of these calculations, the number of instances and quantity seized is attributed to both Equatorial Guinea as well as Ethiopia.
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47. Case No. 112.
48. Case No. 164.
49. Case Nos. 16, 29, and 46.
50. Case Nos. 7, 9, 25, 30, 41, 45, 52, 54, 59, 65, 75, 87, 97, 107, 110, 111, 113, 117, 123, 124, 125, 129, 135, 139, 156 and 171.
51. Case Nos. 2, 18, 43, 62, and 63.
52. Case Nos. 7, 9, 25, 30, 41, 45, 52, 54, 59, 65, 75, 85, 87, 90, 97, 107, 110, 111, 113, 117, 121, 123, 124, 125, 129, 135, 139, 154, 156, 168 and 171.
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56. Case Nos. 33 and 144.
57. Case No. 64.
58. Case Nos. 35, 47 and 99.
59. Case Nos. 27, 32, 33, 35, 47, 68, 83, 93, 98, 99, and 145.
60. Case Nos. 146, 148 and 153.
61. Case Nos. 34, 49 and 78.
62. Case Nos. 19, 31, 55, 58, 86, 112 and 165.
63. Case Nos. 55 and 112.
64. Case No. 82.
65. Case Nos. 67 and 134.
66. Case No. 13.
67. Case Nos. 5 and 28.
68. For instance, in Case No. 106, the court found that the illegal traders had sold whole pangolins to various buyers for consumption as food as well as for medicinal purposes.
69. Case Nos. 19, 32, 33, 56, 72, 116 and 122.
70. Case No. 64.
71. Case Nos. 35 and 47.
72. Paragraph 4(b) of Article VIII of CITES.



73. Xi, F., Chao, X., Wu, S., et al. (2025) Curbing the trade in pangolin scales in China by revealing the characteristics of the illegal trade network. *Scientific Reports*, 15(1). Available at: <https://doi.org/10.1038/s41598-025-87183-5>. [Accessed 7 November 2025].
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76. Case Nos. 55, 58, 86 and 165.
77. Case Nos 114 and 157.
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79. Case No. 12
80. Case Nos. 58, 86 and 165.
81. Case No. 143.
82. Case No. 170.
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93. Case No. 65.
94. Case Nos. 34, 49 and 78.
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