

Gaps in China's Implementation of CITES Asian Big Cat Recommendations

February 2025



Contents

Summary.....	2
Relevant CITES Recommendations.....	2
Captive tigers in China.....	2
Legal domestic markets for Asian big cats in China.....	3
China as a destination for illegal trade in Asian big cats.....	3
Captive facilities as a source for illegal trade.....	4
2024 special campaign.....	5
Conclusion and recommendations.....	5
References.....	6

Summary

The Parties to CITES have made a number of recommendations on Asian big cats (ABC), including that legal domestic markets contributing to poaching or illegal trade should be closed and that tigers should not be bred for trade in their parts and derivatives.

Having examined Chinese court case judgements, this briefing presents information showing that illegal trade in Asian big cats has been sourced from abroad and, in the case of tigers, also from licensed captive facilities.

The court judgments EIA has accessed and reviewed for this purpose are from the period 20-23 from the “China Judgments Online” database (<http://wenshu.court.gov.cn/>).

Our access and collection of these judgments has been limited by organisational capacity, therefore the information presented should be regarded as the bare minimum. The cases EIA has been able to access represent instances in which the entire process of detection, investigation, prosecution and conviction have been completed. They are not representative of the scale of illegal trade, which is likely to be much higher.

Relevant CITES Recommendations

CITES Conference Resolution 12.5 (Rev. CoP19) (the ABC Resolution) contains a range of recommendations for Parties to implement to tackle trafficking and improve the conservation status of tigers, snow leopards, clouded leopards and the Asian population of leopards and lions, which are all listed on Appendix I of the Convention.

Among these recommendations, Parties are urged to adopt comprehensive legislation for Asian big cats, close legal commercial domestic markets which are contributing to poaching or illegal trade, consolidate and where possible destroy stockpiles of Asian big cat parts and derivatives and ensure that there are adequate measures in place to prevent Asian big cat specimens from entering illegal trade from captive facilities.

The ABC Resolution also recommends that consumer states of Asian big cats work with traditional medicine communities and industries to develop and implement strategies for gradually reducing and eventually eliminating the use of Asian big cat parts and derivatives. In addition to the ABC Resolution, Parties in 2007 adopted CITES Decision 14.69, which states that tigers should not be bred for trade in their parts and derivatives.

Captive tigers in China

China was the first country to propose registering a state-owned facility to allow international trade in specimens of captive bred tigers.¹

Tiger farms were established in the country as early as 1986, with one of the purposes being commercial utilisation of parts, including international trade, particularly of bones.²

Despite a domestic prohibition on the use of tiger bone in 1993, the captive tiger population was allowed to grow. In 2007, China's CITES Management Authority reported to CITES CoP14 that its captive tiger population was a foundation for potential future utilisation of tiger bone and furs.³ In December 2013, China reported to CITES that there were more than 5,000 captive tigers in the country.⁴ In 2018, a study commissioned by the CITES Secretariat, estimated that 6,057 captive tigers, amounting to almost half (48 per cent) of the global captive tiger population were in China⁵, on the basis of which the Secretariat identified 36 captive tiger facilities in the country which may be of concern.⁶

However, in 2023 China reported that there were no commercial breeding facilities for tigers in the country.⁷ For the 78th meeting of the CITES Standing Committee, the Secretariat has reported that there are only 2,744 captive tigers in China. No explanation has been provided for such a precipitous fall in numbers over the past six years.

Legal domestic markets for Asian big cats in China

China's legislation on Asian big cats is characterised by strongly worded prohibitions. However, these are diluted by exceptions which allow continued commercial use. China's Wildlife Protection Law (WPL) provides for even the highest level of protected species to be bred, traded and utilised for captive breeding, public exhibition and shows, cultural relics protection and other undefined special circumstances.⁸

In 1993, China's State Council issued a notification prohibiting the use import, export, sale, purchase, transport, carrying and use in medicine of tiger bone and removing it from the official pharmacopeia.⁹

In 2013, EIA documented the legal commercial trade of skins from captive-bred tigers in China¹⁰ as well as the sale of tiger bone wine, which the manufacturer claimed was occurring with the knowledge and endorsement of Government authorities.¹¹ In 2014, China stated it had never banned the trade of tiger parts and products other than bone and that commercial use of such parts was subject to approval by the State Forestry Administration, but that no such commercial use had been approved.¹²

In 2018, a China State Council notice effectively modified the 1993 ban on the use of tiger bone and allowed the use of farmed tiger bone in "eligible hospitals".¹³ Following a public outcry, the State Council Executive Deputy Secretary stated that the notice would be implemented after a "study" and that "three strict bans", i.e., a ban on import and export of tigers and their byproducts, a ban on sale, purchase, transport, carrying and mailing of tigers and their byproducts and a ban on use of tiger bone in medicine would continue.¹⁴

In 2019, China confirmed to CITES that trade of skins from captive-bred tigers was permitted under "scrutiny" through a 2007 State Forestry Administration Notification, while at the same time reiterating that the "three strict bans" were still in place.¹⁵ This series of conflicting statements and orders causes confusion.

In contrast to tigers, the legal market for leopard parts and derivatives is clearer. In 1993, leopard bone was approved as a substitute for tiger bone in traditional Chinese medicines and a "special marking" scheme is operated to authorise trade in products containing the species.¹⁶

In 2006, the State Food and Drug Administration ordered that only existing stocks of leopard bone could be used in medicines.¹⁷ In 2014, the Government approved a brand of leopard bone wine as "intangible cultural heritage" and in 2018 it approved the sale of 1,230.5kg of leopard bone to a company manufacturing the wine.¹⁸ A 2019 CITES report notes that this type of wine was widely advertised and had a sales volume of 20,000 bottles per month on just one online medical store.¹⁹

In 2023, EIA documented at least 38 traditional Chinese medicine products online claiming to contain leopard bone, which displayed permit numbers issued by the National Medical Products Administration of China.²⁰

China as a destination for illegal trade in Asian big cats

Court judgments from China for the period 2014-23 show a minimum of 23 instances in which Asian big cat specimens have been seized in illegal trade and sourced from other countries.

The source countries for these specimens were identified as follows: 1) Myanmar in six instances involving tiger, leopard and clouded leopard;²¹ 2) Vietnam in five instances involving tiger and leopard;²² 3) Russia in three instances involving tiger;²³ 4) South Africa in two instances involving tiger;²⁴ 5) Bangladesh in two instances involving tiger;²⁵ 6) Laos in one instance involving tiger;²⁶ 7) Nepal in one instance involving leopard;²⁷ 8) Indonesia in one instance involving tiger;²⁸ 9) Japan in one instance involving tiger;²⁹ and 10) Mongolia in one instance involving snow leopard.³⁰

In addition to these, the judgements in a further 11 cases indicate that seized Asian big cat specimens are linked³¹ to Myanmar in five instances,³² Vietnam in three instances,³³ Russia in two instances³⁴ and Nepal in one instance.³⁵ With the exception of South Africa and Japan, the source countries mentioned above are all range states for the species involved.

While most of the cases involve detection at borders, some illustrate illegal trade detected within China where the specimens have been sourced from abroad. In one case, more than 700 wildlife products were seized in September

2015 including tiger vertebrae, bear teeth, bear claws and pangolins. The defendants were a couple who had established a business of trading illegal wildlife products with customers developed through WeChat.

The court found that the husband had sourced many of the products, including the tiger bones, while on trips to Indonesia.³⁶ In another case from 2020 involving the seizure of tiger skins, the skins were revealed to have been sourced from Vietnam and WeChat was again used as a means of communication between the buyers and traders.³⁷

The instances reported here are cases where not only has the entire enforcement process of detection, investigation, prosecution and conviction been completed, but which also happen to have been publicly reported and accessed by EIA. They are therefore likely to represent only a fraction of the actual illegal trade that has taken place. Nevertheless, they present compelling evidence that demand from China has driven illegal trade of Asian big cats from neighbouring countries. It is worth noting that court judgments also document the illegal import into China of African leopard from African range states³⁸ and in one instance jaguar specimens from Bolivia.³⁹

The continued existence of legal domestic markets for Asian big cat specimens such as leopard bone medicines and wine may contribute to illegal trade by sustaining demand and complicating enforcement efforts. In one case involving illegal domestic trade the defendants, who owned a pharmaceutical trading company, argued that the pangolins scales and leopard bones seized from them should not be considered illegal items as they had a license to deal in them.

However, while convicting them of illegal purchase and sale, the court held that it was necessary to apply for approvals based on the legal origin of specific batches, which the defendants had not done.⁴⁰ While this is an example of enforcement of regulations, it also illustrates how licensed legal commercial trade can contribute to illegal trade whether through intent or ignorance.

Captive facilities as a source for illegal trade

Court judgments from China over the period 2014-23 reveal a minimum of five instances in which tiger specimens in illegal trade in China were sourced from identified licensed captive facilities within the country.⁴¹

In a remarkable case from 2016,⁴² the legal representative of a zoo with a domestication and breeding license was found to have sold 25 tigers over the course of four years to a person who organised the slaughter of the animals and sale of their parts; 20 of these tigers were alive at the time of sale and five were dead. A seized tiger carcass, 21 tiger skins both fresh and processed and several other tiger parts were seized. The court convicted the representative of the zoo, the main organiser of the slaughter and sale, and several accomplices of crimes.

In another case from 2021,⁴³ the operator of an animal troupe which held a domestication and breeding license for Siberian tigers and which performed in one zoo gave another zoo owner 10kg of tiger meat and a tiger head from a dead tiger as consideration for allowing his troupe to perform at the latter's zoo. The tiger meat was given to a wildlife business operator, who sold it. This wildlife business operator also illegally sourced bear parts from another zoo and illegally traded owls and other wildlife. All three of these defendants and other associated parties were found guilty of crimes and sentenced.

Aside from cases in which a named licensed facility was identified to be the source of illegal trade, at least two other cases imply captive-bred animals as the source without confirming their exact origin. In one case from 2016, the defendant illegally purchased three tiger cubs from an unidentified zoo in Suqian city.⁴⁴ In the other, the defendants collected two live tigers from different locations, slaughtered them and sold their parts on the spot to buyers.⁴⁵ The evidence in this case suggests that the tigers were sourced from circuses.

As with specimens sourced illegally from abroad, these cases may represent only a fraction of the tiger specimens illegally sourced from captive facilities. In several of the cases, the argument that the animals were captive-bred was used by defendants to request lower penalties or avoid guilt.

In all the cases that we accessed, the courts uniformly rejected the argument that the legal provisions for wildlife protection do not apply to captive-bred animals. However, similar to continuing legal markets for Asian big cat products, it is possible that ambiguity in legislation or public policy about the use of captive tigers may lead to confusion among the public.

2024 special campaign

In May 2024, it was reported in the media⁴⁶ that a large number of wild animals, including 20 Siberian tigers, had died over the course of a few years at a wildlife park in Fuyang, Anhui province and that animals were being housed in the park in severely deficient conditions.

This was a facility that had reportedly applied for permission to breed and exhibit tigers. The application was reportedly rejected by authorities in 2018, but the business nonetheless continued to breed tigers. Shortly thereafter, on 23 May 2024, the National Forestry and Grasslands Administration of China (NFGA) issued a notice on “launching a special campaign to regulate the artificial breeding of tigers and other terrestrial wild animals”⁴⁷ It was reported that the Fuyang wildlife park was penalised with a fine of 11.39 million RMB (approximately \$ 1.57 million) and the confiscation of 670,000 RMB (approximately \$92,000) in illegal gains by the Fuyang Yingdong District Forestry Bureau for suspected illegal breeding and exhibition of tigers and other wildlife.⁴⁸

The NFGA's 2024 notice stated that a special rectification campaign would be carried out on the artificial breeding of tigers and other terrestrial wild animals from the date of the notice till 30 September 2024. During this period, the acceptance of applications for artificial breeding licenses of protected terrestrial wild animals such as tigers would be suspended.

The notice directed provincial authorities to carry out verification of relevant matters such as breeding records, licenses, the legality of sources and the conditions and survival of animals in captivity. It directed authorities to investigate and deal with any illegalities including illegal trade, killing and transportation of tigers in accordance with the law. It also mandated measures to improve monitoring of the artificial breeding and death of captive tigers and other terrestrial wild animals.

The measures mentioned in the NFGA notice are welcome. However, the special campaign appears to be a time bound operation with provincial authorities required to submit reports to the NFGA by 31 October 2024. The suspension of acceptance of applications for artificial breeding of tigers is therefore presumably over. The notice also did not impose any clear restrictions on the breeding of tigers by existing license holders. The legislative provisions which allow for such artificial breeding, whether or not connected to any real conservation value, presumably continue to apply.

Conclusion and recommendations

Recently, slight increases have been reported in wild populations of tigers (from >7 in 2016 to >60 in 2023)⁴⁹ in China. While these populations remain fragile, this is positive news.

The court judgments that we have reviewed also indicate that Chinese enforcement authorities are capable of conducting complex investigations and taking decisive action against illegal trade of Asian big cats. However, they also indicate that demand for Asian big cat parts and derivatives in China remains a significant threat to these species. There has been illegal trade of Asian big cat specimens from neighbouring range states into China and captive tiger populations within China have been a source for illegal trade and consumption.

In this context, the continued existence of legal markets for Asian big cat products, the large captive tiger population with no apparent conservation benefit and stockpiles of tiger parts pose undue risks to the conservation and recovery of these species in China and the rest of their range. This is particularly so in the case of leopards, whose conservation status has declined significantly in South-East Asia over the past two decades.

Parties to CITES have adopted fairly unambiguous recommendations to improve the conservation status of Asian big cats and the implementation of the Convention for these species. EIA encourages China to fully implement these recommendations and in particular to:

- take legislative measures to prohibit all commercial trade in Asian big cat parts and derivatives irrespective of their source
- impose restrictions on the captive breeding of tigers and other Asian big cats to ensure that they are only bred for conservation purposes
- consolidate and destroy stockpiles of Asian big cat parts and derivatives with limited exceptions for those that are to be used for scientific or educational purposes.

References

1. CITES. CoP8 Doc 8.39. Available from: <https://cites.org/sites/default/files/eng/cop/08/doc/E-39.pdf> [Accessed 28 January 2025]
2. IUCN Cat Specialist Group. 1987. Tiger breeding station to provide bones proposed. Cat News. No. 7. pp 17-18; IUCN Cat Specialist Group. 1991. The Breeding Centre for Siberian Tigers in China. Cat News. No. 15. pp. 3-4; IUCN Cat Specialist Group. 1992. Chinese Breeding Centre for Felidae. Cat News. No. 17. pp. 4-6.
3. CITES. 2007. CoP14 Doc. 52 Annex 1. p. 4. Available from: <https://cites.org/sites/default/files/eng/common/cop/14/doc/E14-52A01.pdf> [Accessed 28 January 2025].
4. CITES. 2014. SC65 Doc. 38 Annex 3, available at <https://cites.org/sites/default/files/eng/com/sc/65/EFS-SC65-38-A03.pdf> [Accessed 28 January 2025].
5. CITES. 2018. SC70 Doc. 51 Annex 2 (Rev. 1) available at <https://cites.org/sites/default/files/eng/com/sc/70/E-SC70-51-A2-R1.pdf> [Accessed 28 January 2025].
6. CITES. 2018. SC70 Doc. 51 available at <https://cites.org/sites/default/files/eng/com/sc/70/E-SC70-51.pdf> [Accessed 28 January 2025].
7. CITES. 2023. SC77 Doc. 41.1. p. 18. Available from: https://cites.org/sites/default/files/documents/E-SC77-41-01_0.pdf [Accessed 28 January 2025].
8. China Wildlife Protection Law. 2023. Article 28. Available at <http://www.npc.gov.cn/npc/c30834/202212/77cc070369d94dd09270fb9c0f52cbd0.shtml> [Accessed 28 January 2025].
9. State Council of China. 1993. Circular of the State Council on Banning the Trade of Rhinoceros Horn and Tiger Bone. Available from: <http://www.asianlii.org/cn/legis/cen/laws/cotscobttorhatb696/> [Accessed 28 January 2025].
10. EIA. 2013. Hidden in Plain Sight: China's Clandestine Tiger Trade. pp. 6-8. Available from: <https://eia-international.org/wp-content/uploads/EIA-Hidden-in-Plain-Sight-med-res.pdf> [Accessed 28 January 2024].
11. EIA. 2013. Briefing on the Manufacture of Tiger Bone Wine in China. Available from: https://eia-international.org/wp-content/uploads/FINAL_Sanhong-Briefing_June-20-201321.pdf [Accessed 28 January 2025].
12. CITES. 2014. SC65 Summary Record. p. 20. Available from: <https://cites.org/sites/default/files/common/com/sc/65/E-SC65-SumRec.pdf> [Accessed 28 January 2025].
13. The State Council of the People's Republic of China. 2018. Notice on the operation and utilisation of rhinos, tigers and their products. Available at: http://www.gov.cn/zhengce/content/2018-10/29/content_5335423.htm [Accessed 28 January 2025]; [Unofficial translation] <https://eia-international.org/wp-content/uploads/State-Council-Notification-regarding-strict-control-of-management-and-utilisation-of-rhinoceroses-tigers-and-the-products-thereof.pdf> [Accessed 28 January 2025].
14. Xinhua. 2018. Full Transcript: State Council Executive Deputy Secretary-General Ding Xuedong answers media questions. November 12. Available at http://www.china.org.cn/china/Off_the_Wire/2018-11/12/content_71941870.htm [Accessed 28 January 2025].
15. CITES. 2019. CoP18 Doc. 71.1 Annex 5. Available from: <https://cites.org/sites/default/files/eng/cop/18/doc/E-CoP18-071-01.pdf> [Accessed 28 January 2025].
16. Report of the Consultant. 2019. Implementation of CITES Decision 17.228: review of implementation of Resolution Conf. 12.5 (Rev. CoP17) on conservation of and trade in tigers and other Appendix I Asian big cats. CoP18 Doc. 71.1 Annex 4. Available from: <https://cites.org/sites/default/files/eng/cop/18/doc/E-CoP18-071-01.pdf> [Accessed 28 January 2025].
17. CITES Management Authority of People's Republic of China. 2007. Report on Implementing Resolution Conf. 12.5 of CITES. CoP14 Doc. 52 Annex 1. p.2. Available from: <https://cites.org/sites/default/files/common/cop/14/doc/E14-52A01.pdf> [Accessed 28 January 2025].
18. Environmental Investigation Agency. 2018. Down to the bone: China's alarming trade in leopard bones. Available from: <https://eia-international.org/wp-content/uploads/Chinese-Government-agency-issuing-permits-for-commercial-trade-in-bone-of-hundreds-of-leopards.pdf> [Accessed 28 January 2025].
19. Report of the Consultant. 2019. Implementation of CITES Decision 17.228: review of implementation of Resolution Conf. 12.5 (Rev. CoP17) on conservation of and trade in tigers and other Appendix I Asian big cats. CoP18 Doc. 71.1 Annex 4. Pp 23-24. Available from: <https://cites.org/sites/default/files/eng/cop/18/doc/E-CoP18-071-01.pdf> [Accessed 28 January 2025].
20. Environmental Investigation Agency. 2023. Investing in Extinction: How the global financial sector profits from traditional medicine firms using threatened species. Available from: https://eia-international.org/wp-content/uploads/2023-EIA-UK-Investing-in-Extinction_SINGLE-PAGES.pdf [Accessed 28 January 2025].
21. Judgement dated 11 September 2014, Yunnan Fugong People's Court, case (2014) Fu Criminal First No. 34; Judgment dated February 2015, Yunnan Pu'er Intermediate People's Court, case (2015) Pu Intermediate Criminal Final No. 11; Judgment dated 13 October 2015, Yunnan Menghai People's Court, case (2015) Hai Criminal First No. 232; Judgment dated 26 February 2016, Yunnan Baoshan Intermediate People's Court, case (2015) Bao Intermediate Criminal First No. 381; Judgment dated 28 December 2016, Yunnan Baoshan Intermediate People's Court, case (2016) Yun 05 Criminal First No. 301; Judgment dated 04 September 2018, Yunnan Higher People's Court, case (2018) Yun Criminal Final No. 836.
22. Judgment dated 03 August 2016, Yunnan Higher People's Court, case (2016) Yun Criminal Final No. 819; Judgment dated 17 February 2017, Xinjiang Uygur Autonomous Region Urumqi Intermediate People's Court, case (2016) Xin 01 Criminal Final No. 247; Judgment dated 01 June 2020, Guangxi Zhuang Autonomous Region Chongzuo Intermediate People's Court, case (2020) Gui 14 Criminal Final No. 70; Judgment dated 28 August 2020, Henan Higher People's Court, case (2020) Yu Criminal Final No. 164; Judgment dated 14 March 2021, Guangxi Zhuang Autonomous Region Dongxing People's Court, case (2021) Gui 0681 Criminal First No. 306.
23. Judgment dated 15 August 2014, Heilongjiang Jiamusi Intermediate People's Court, case (2014) Jia Criminal Second First No. 6; Judgment dated 04 August 2015, Yanji City People's Court, case (2014) Yan Criminal First No. 467; Judgment dated 14 December 2018, Heilongjiang Jiamusi Intermediate People's Court, case (2018) Hei 08 Criminal First No. 38.
24. Judgment dated 21 April 2016, Yunnan Higher People's Court, case (2016) Yun Criminal Final No. 359; Judgment dated 29 December 2016, Yunnan Higher People's Court, case (2016) Yun Criminal Final No. 1518.
25. Judgment dated 08 April 2015, Yunnan Kunming Intermediate People's Court, case (2014) Kun Environmental Protection Criminal First No. 1; Judgment dated 23 January 2016, Yunnan Kunming Intermediate People's Court, case (2015) Kun Environmental Protection Criminal First No. 2.
26. Judgment dated 9 December 2016, Yunnan Provincial Higher People's Court, case (2016) Yunxingzhong No. 1231.
27. Judgment dated 03 June 2021, Tibet Autonomous Region Higher People's Court, case (2021) Zang Criminal Final No. 4.
28. Judgment dated 27 March 2017, Putian Licheng District People's Court, case (2016) Min 0304 Criminal First No. 524.
29. Judgment dated 15 May 2017, Liaoning Provincial Higher People's Court, case (2017) Liao Criminal Final No. 104.
30. Judgment dated 25 August 2017, Inner Mongolia Autonomous Region Hulunbuir Intermediate People's Court, case (2017) Nei 07 Criminal First No. 47.
31. An incident is considered linked to a country by either the nationality of the perpetrator or a mention of the country as part of the trade route in witness statements, confessions or other evidence.
32. Judgment dated 29 December 2015, Yunnan Mangshi People's Court, case (2015) Mang Criminal First No. 138; Judgment dated 29 October 2019, Baoshan Intermediate People's Court, case (2019) Yun 05 Criminal First No. 148 confirmed on appeal by the Judgment dated 02 July 2020, Yunnan Higher People's Court case (2020) Yun Criminal Final No. 245; Judgment dated 26 December 2018, Yunnan Xishuangbanna Dai Autonomous Prefecture Intermediate People's Court, case (2018) Yun 28

- Criminal Final No. 103; Judgment dated 21 February 2019, Yunnan Dehong Dai and Jingpo Autonomous Prefecture Intermediate People's Court, case (2019) Yun 31 Criminal Final No. 44; Judgment dated 03 June 2020, Yunnan Guangnan People's Court, case (2020) Yun 2627 Criminal First No. 69.
33. Judgment dated 12 May 2016, Kunming Panlong District People's Court, case (2016) Yun 0103 Criminal First No. 103; Judgment dated 29 December 2017, Yunnan Hekou Yao Autonomous County People's Court, case (2017) Yun 2532 Criminal First No. 121; Judgment dated 27 December 2018, Yunnan Hekou Yao Autonomous County People's Court, case (2018) Yun 2532 Criminal First No. 96.
 34. Judgment dated 04 November 2020, Heilongjiang Suifenhe People's Court, case (2020) Hei 1081 Criminal First No. 33; Judgment dated 20 January 2021, Heilongjiang Heihe Intermediate People's Court, case (2020) Hei 11 Criminal First No. 33.
 35. Judgment dated 22 May 2016, Tibet Autonomous Region Ngari Intermediate People's Court, case (2016) Zang 25 Criminal Final No. 1.
 36. Judgment dated 27 March 2017, Putian Licheng District People's Court, case (2016) Min 0304 Criminal First No. 524.
 37. Judgment dated 01 June 2020, Guangxi Zhuang Autonomous Region Chongzuo Intermediate People's Court, case (2020) Gui 14 Criminal Final No. 70.
 38. Judgment dated 31 March 2014, Zhejiang Hangzhou Intermediate People's Court, case (2014) Zhe Hang Criminal First No. 48 involving the trafficking of leopard from Nigeria; Judgment dated 08 May 2014, Shandong Weihai Intermediate People's Court, case (2014) Wei Criminal Second First Nr 3. involving the trafficking of leopard from Kenya
 39. Judgment dated 11 January 2016, Beijing Higher People's Court, case (2015) Higher Criminal Final No. 662.
 40. Judgment dated 11 December 2015, Anhui Bozhou Qiaocheng District People's Court, case (2015) Qiao Criminal First No. 00449.
 41. Judgment dated 30 July 2015, Henan Sanmenxia Intermediate People's Court, case (2015) San Criminal Final No. 88; Judgment dated 21 April 2017, Anhui Suzhou Yongqiao District People's Court, case (2016) Wan 1302 Criminal First No. 930; Judgment dated 16 December 2017, Baihe Forest District Basic Court, case (2017) Ji 7503 Criminal First No. 51; Judgment dated 21 February 2021, Zhejiang Jinhua Intermediate People's Court, case (2020) Zhe 07 Criminal Final No. 630; Judgment dated 29 November 2016 Guangdong Higher People's Court, case (2016) Yue Criminal Final No. 961.
 42. Judgment dated 29 November 2016, Guangdong Higher People's Court, case (2016) Yue Criminal Final No. 961.
 43. Judgment dated 09 February 2021, Zhejiang Jinhua Intermediate People's Court, case (2020) Zhe 07 Criminal Final No. 630
 44. Judgment dated 29 February 2016, Anhui Suzhou Yongqiao District People's Court, case (2015) Yong Criminal First No. 00902.
 45. Judgment dated 06 December 2018, Guangdong Leizhou People's Court, case (2018) Yue 0882 Criminal First No. 282.
 46. A large number of animals died in Fuyang Wildlife Park, including 20 Siberian tigers', China Philanthropist Magazine, 13 May 2024, available at https://www.guancha.cn/politics/2024_05_13_734613.shtml [Accessed 28 January 2025].
 47. Notice of the State Forestry and Grassland Administration on launching a special campaign to regulate the artificial breeding of tigers and other terrestrial wild animals, 23 May 2024, available at <http://www.forestry.gov.cn/lyj/1/gkzfwj/20240523/572165.html> [Accessed 28 January 2025]
 48. "Fuyang Wildlife Park operator fined over 10 million yuan for suspected illegal exhibition and breeding of tigers and other wild animals", Duan Yanchao, [cenews.com.cn](https://www.cenews.com.cn/news.html?aid=1151189), available at <https://www.cenews.com.cn/news.html?aid=1151189> [Accessed 28 January 2025].
 49. Global Tiger Forum and the Global Tiger Initiative Council. 2023. Global Tiger Recovery Program 2.0. p. 19. Available from https://globaltigerforum.org/wp-content/uploads/2023/08/GTRP_2.0_2023-34_Rev.1.pdf [Accessed 28 January 2025]. Rostro-García, S., Kamler, J.F., Sollmann, R., Balme, G., Augustine, B.C., Kéry, M., Crouthers, R., Gray, T.N.E., Groenenberg, M., Prum, S., Macdonald, D.W. July 2023. Population dynamics of the last leopard population of eastern Indochina in the context of improved law enforcement. *Biological Conservation*. 283. Available at <https://doi.org/10.1016/j.biocon.2023.110080> [Accessed 28 January 2025]; Stein, A.B., Gerngross, P., Al Hikmani, H., Balme, G., Bertola, L., Drouilly, M., Farhadinia, M.S., Feng, L., Ghoddousi, A., Henschel, P., Jhala, Y., Khorozyan, I., Kittle, A., Laguardia, A., Luo, S.-J., Mann, G., Miquelle, D., Moheb, Z., Raza, H., Rostro-García, S., Shivakumar, S., Song, D. & Wibisono, H. 2024. *Panthera pardus*. The IUCN Red List of Threatened Species 2024: e.T15954A254576956, available at <https://dx.doi.org/10.2305/IUCN.UK.2024-1.RLTS.T15954A254576956.en> [Accessed 28 January 2025].

