

EIA Recommendations for the 78th Meeting of the CITES Standing Committee

February 2025



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Doc. 33.8 Application of Article XIII in the Lao People's Democratic Republic

The Secretariat reports on implementation of the Standing Committee's (SC) recommendations by Lao PDR (hereafter Laos) as part of the Article XIII process under which it is currently subject to a suspension of all commercial trade in CITES-listed species. EIA supports the recommendation to Parties to continue to suspend trade with Laos. The proposed SC recommendations also include measures on national legislation, capacity-building, law enforcement, regional cooperation, Asian elephants as well as and tiger and other wildlife farms.

The Secretariat has assessed Laos' legislation as meeting the minimum requirements to be placed in Category 1. EIA notes that while Laos has made some progress on its national legislation there continue to be material gaps with reference to CITES implementation. In particular, there is a lack of clarity in the definitions that have been used and therefore whether the legislation covers the full range of species and specimens to which CITES applies.¹ The provisions implementing the CITES conditions of trade are not as clear as they ideally should be.² There is also a lack of clarity regarding the powers of confiscation and return of specimens as required by the Convention and the penalties for offences.

The Secretariat has itself indicated in the document that certain provisions in Laos' legislation require further clarification and proposes that gaps or inadequacies can be addressed in future. Considering the other serious compliance issues affecting Laos, we would recommend that the SC instruct the Secretariat to continue to review the remaining gaps in Laos' legislation as part of the compliance process.

The Secretariat has reported very limited progress by Laos in implementation of the recommendations regarding law enforcement, international cooperation and wildlife farms. The limited seizures and prosecutions reported by Laos is of particular concern when contrasted with the scale of illegal trade of CITES-listed species observable in the country. The Secretariat also highlights serious questions and concerns regarding the farming and trade of *Macaca fascicularis* in Laos.

With regard to tiger farms, the SC's recommendations remain largely unimplemented and are contingent upon future work by a "Committee for Resolving the Tiger Farm Issue in the Lao People's Democratic Republic" appointed by the Laos Government. In addition to the six tiger farms accounted for by Laos in the information provided to the CITES Secretariat in September 2022³ prior to its February 2023 mission to the country, another facility keeping and breeding tigers has been established in the country, reportedly in 2023. Recent independent footage of this facility shows a number of tiger cubs/juveniles present, indicating that the facility is being used to breed tigers. Further, a member of staff was also documented carrying the skin of a tiger, indicating that the facility may be harvesting parts of tigers for trade. This facility has been established despite the issuance of Order No 5 of the Prime Minister of Laos in May 2018 prohibiting the establishment of wildlife farms for Appendix I species for business purposes and recommending turning existing farms into safari or zoos for conservation, tourism or scientific purposes only.⁴

The Secretariat has highlighted the general prohibition in Laos' CITES Decree⁵ on the breeding of wild animals in CITES Appendix I for commercial purposes as a sign of progress. However, "commercial purpose" is defined by the CITES Decree with reference to international trade⁶ and this general prohibition would therefore not necessarily stop the farming of CITES Appendix I species for domestic trade. This prohibition may not result in implementation of the recommendations on tigers, particularly Decision 14.69.

The Secretariat has also recommended that Laos should encourage facilities to engage in coordinated conservation breeding of any identified specimens of tigers referable to the mainland South-East Asian lineage (also known as *Panthera tigris corbetti*). Criminal enterprises have been linked to the operation of the tiger facilities in Laos.⁷ For this reason, we do not think it is appropriate for the existing tiger farms to be tasked with any conservation breeding of tigers. It is also highly unlikely that these facilities, which were set up as purely commercial operations, will have the technical capacity to engage in such conservation breeding. We accordingly propose that this recommendation be appropriately modified.

EIA recommends that the Standing Committee:

- **SUPPORTS the Secretariat's recommendation to continue suspension of commercial trade in CITES-listed species with Laos**

- **ADOPTS the recommendations in paragraph 71 of the document with the following amendments to Paragraph 71.j**

"takes steps to identify, if possible, any pure specimens of tigers referable to the mainland Southeast Asian lineage (also known as *Panthera tigris corbetti*) and encourage facilities to engage in coordinated conservation breeding of such animals arrange for the transfer of these specimens to appropriate ex-situ conservation breeding sites, if identified."

- **INSTRUCTS the Secretariat to continue to review any remaining gaps or inadequacies in Laos' legislation as part of the Article XIII process in light of its observations in paragraph 10 of the document.**

Doc. 33.12 Totoabas

The Secretariat's report was not available at the time of writing, but EIA welcomes the detailed Secretariat reports on missions undertaken in 2024 regarding totoaba (docs 33.12.1 A4-A6).

Secretariat missions were undertaken to Mexico to review implementation of its [Compliance Action Plan](#) (CAP) and assess the situation on the ground and to China and the US to get a better understanding of the measures and activities being implemented by these Parties.

While illegal fishing within the Zero Tolerance Area (Zo) and Vaquita Refuge Area (VRA) has reduced, it is clear from the mission to Mexico, from Sea Shepherd Conservation Society data and independent reports, that widespread fishing continues within Critically Endangered vaquita habitat. Only 6-8 vaquitas were observed during the May 2024 survey and they remain perilously close to extinction. While Mexico has made some progress in implementation of its CAP, there has been a failure to implement the gillnet prohibition and fishing continues, albeit at a lower level, in the Zo and VRA.

The Secretariat documented the need for persistent and strong action to safeguard vaquita in the Zo and VRA. Given the urgency of the situation, Mexico must focus on effectively and fully enforcing the exclusion of gillnets, including to prevent illegal totoaba fishing, and expediting the use of alternative fishing gears that do not cause vaquita entanglement but would ensure sustainable communities' livelihoods.

The missions to Mexico, China and the US further identified that the illegal transnational trade of totoaba swim bladders persists and dedicated efforts are required in source, transit and destination countries to combat the trade.

EIA recommends that the Standing Committee:

- **CONSIDERS suspension of trade with Mexico involving CITES-listed species, to remain in place until gillnet fishing nets are excluded from vaquita habitat**
- **ENCOURAGES Mexico to expedite technological development of alternative fishing gears that do not entangle vaquitas**
- **ENCOURAGES renewed and dedicated enforcement operations in Mexico, China, the US and other transit countries to combat totoaba trafficking.**

Doc. 33.13.1 National Ivory Action Plan process: Report of the Secretariat

EIA supports the Secretariat's conclusion that Cambodia and Malaysia have made sufficient progress to exit the NIAP process, although we urge the Secretariat and CITES Parties to continue vigilantly monitoring their compliance with other CITES mechanisms in order to ensure emerging trends linked to illegal ivory trade are detected. The latest known large-scale seizures of ivory arriving from Africa implicating Cambodia and Malaysia was recorded in December 2018 and July 2022 respectively.

Angola should be encouraged to remain in the NIAP process. Since 2020, Angola has been implicated in the confiscation of approximately nine tonnes of ivory, of which only 10 per cent of confiscations were made in the country.⁸ This highlights that large amounts of illegal ivory have left Angola undetected, indicating weak detection and/or interception efforts at ports of exit. The key country linked to ivory trafficking in Angola is Vietnam, with which Angola should urgently improve communication and intelligence exchange to investigate and hold individuals and entities involved accountable for their offences and report to SC81. It is recommended that Angola includes this activity under the fourth pillar of its NIAP on "National and international cooperation in combating wildlife crime".

In 2023 and 2024, Angola and NIAP Category A and B Parties including DR Congo, Mozambique, Nigeria and Vietnam continue to be implicated in large scale seizures amounting to approximately 16 tonnes of ivory. Of these, Vietnam confiscated more than 7.6 tonnes arriving from Angola in March 2023 and approximately 1.6 tonnes arriving from Nigeria in March 2024. However, none of these Parties reported on measures to pursue international cooperation with affected countries to conduct joint investigations or to support prosecutions. This lack of international cooperation is counter to NIAP Pillar 3 on *International and regional enforcement collaboration* and paragraph 14 of Resolution Conf. 11.3 (Rev. CoP19) which recommends Parties to strengthen transnational cooperation through the use of multinational frameworks provided by INTERPOL, World Customs Organization (WCO), the UN Convention against Transnational Organized Crime (UNTOC) and the UN Convention against Corruption (UNCAC).

It is also worth noting that these five Parties, alongside Gabon in Category B, have been in the NIAP process for a decade, indicating persistent concerns regarding their role in a resilience to illegal wildlife trade. The Secretariat, Parties and other relevant stakeholders are encouraged to provide support to these Parties to implement remaining activities in their plans, in particular those included under Pillars 2 on *National level enforcement action and inter-agency collaboration* and Pillar 3 on *International and regional enforcement collaboration*.

EIA recommends that the Standing Committee:

- **SUPPORTS the Secretariat's recommendations for Cambodia and Malaysia to exit the NIAP process at SC78**
- **DIRECTS the Secretariat to continue monitoring illegal trade in ivory relating to Cambodia and Malaysia in accordance with Resolution Conf. 10.10 (Rev. CoP19) and brings any matter of concerns to the attention of the Standing Committee**
- **SUPPORTS the Secretariat's recommendations to issue a written caution requesting Congo, Qatar and Togo to submit a progress report to the Secretariat in accordance with Step 4, paragraph f) of the Guidelines**
- **SUPPORTS the Secretariat's recommendation that Angola continues to remain in the NIAP process and strengthens international cooperation with Vietnam to tackle illegal ivory trade and report to SC81**
- **REJECTS the Secretariat's recommendation that urges all Parties included in the process to achieve their goals by SC81. This is an arbitrary deadline and is unrealistic as some Parties have just achieved less than 50 per cent of their NIAP by SC78. Exit from the process should not become the primary goal at the expense of effective legislative and enforcement improvements to tackle ivory and other wildlife trafficking**
- **URGES all Parties, particularly Parties in Categories A and B and Angola, to strengthen international law enforcement cooperation to tackle ivory and other wildlife trafficking pursuant to Resolution Conf. 11.3 (Rev. CoP19)**
- **CONSIDERS appropriate measures at SC81, in accordance with Step 4 paragraph f) of the Guidelines and Resolution Conf. 11.3 (Rev. CoP19), if Category A and B Parties, especially those that have been in the process for a decade,⁹ fail to make adequate progress in the implementation of their NIAP.**

Doc. 33.13.2 Review of the National Ivory Action Plan Process

A review of the NIAP Process was agreed at CoP19, as per Decision 19.68-19.70, and was conducted by an external consultant in 2024. EIA thanks the UK for funding the Review and thanks the consultant for their substantial efforts.

EIA generally welcomes the findings of the Review, although is disappointed to note that the Secretariat has not reflected the breadth of the NIAP Review findings in its proposed amendments to the NIAP Guidelines contained in Annex 3 of Res. Conf. 10.10 (Rev. CoP19). This is a missed opportunity to strengthen the NIAP process and the Standing Committee should seek further consideration of the necessary amendments to the NIAP Guidelines, as called for by the Review. In particular, the Standing Committee should interrogate why the Secretariat has appeared to focus only on a limited number of the short-term recommendations made in the Review, without much attention to the longer-term and arguably more impactful suggested enhancements to the process. For example, the Review concludes that the current use of indicators in the NIAP process is unclear and underdeveloped and is oriented towards action-achievement and not impact. As such, the current use of indicators in the NIAP process may be undermining progress ratings. However, the Secretariat's proposed amendments to the Guidelines do little to address this fundamental issue.

The NIAP process is more than a decade old and the Review adopted at CoP20 was a rare and timely opportunity to ensure it remains fit for purpose. As such, the Standing Committee should ensure the scope of the Review's findings

is considered and that the intention of Decision 19.68 is fulfilled.

EIA recommends that the Standing Committee:

- **ACCEPTS** the Secretariat's proposed amendments to Step 1 and 2 of the NIAP Guidelines and makes additional amendments to Steps 3-5 of the NIAP Guidelines as recommended in the NIAP Review
- **DIRECTS** the Secretariat to continue monitoring illegal trade in ivory relating to Cambodia and Malaysia in accordance with Resolution Conf. 10.10 (Rev. CoP19) and brings any matter of concerns to the attention of the Standing Committee
- **PROPOSES** additional amendments to Step 3) e of the NIAP Guidelines, as follows:
 - e) If new or emerging elephant poaching or ivory trafficking trends or related matters so require, the Secretariat shall recommend to the Standing Committee that the Party update its NIAP to incorporate new critical actions needed to respond to such trends or related matters. If agreed by the Standing Committee, the Party shall prepare and submit an updated NIAP to the Secretariat within 60 days following the meeting of the Standing Committee.
In formulating recommendations regarding necessary NIAP updates for consideration by the Standing Committee, the Secretariat should take into consideration sources of information including:
 - i) whether a Party has remained a Category A across two successive ETIS reports since its NIAP was accepted or last updated
 - ii) whether a Party's Category rises between two ETIS reports
 - iii) whether a Party has been implicated in one or more large-scale ivory seizures during an intersessional period
 - iv) Negative PIKE and elephant population trends, in consultation with the IUCN Specialist Groups
- **PROPOSES** an additional amendment to Step 3 by creating a new paragraph f) as follows:
 - f) The Secretariat shall make recommendations to the Standing Committee when a Party's NIAP timeframe has been exceeded, and request the Party to update relevant NIAP activities 60 days ahead of the next Standing Committee, as appropriate**
- **PROPOSES** an additional amendment to Step 4 c) as follows:
 - c) The Secretariat will evaluate the reports, based on the self-assessments **and other available information such as ETIS and Annual Illegal Trade Reports**, and in cooperation with experts, if needed, submit the reports to the Standing Committee at each of its regular meetings, **and** make recommendations to the Standing Committee, as appropriate, and also make the reports publicly available on the NIAP webpage as soon as they are received.
- **PROPOSES** additional amendments to Step 4 d) as follows:
 - d) The Secretariat will determine where insufficient information was available to conduct an evaluation of progress or actions against set milestones or, objectives **and indicators agreed at Step 2 3) vi) of the Guidelines**, to assess **both the achievement and impact of the actions taken**.
- **PROPOSES** additional amendments to Step 5 c) as follows:
 - c) In formulating recommendations for consideration by the Standing Committee in accordance with Step 5, paragraph b) above, the Secretariat should take into consideration the following elements, when relevant and appropriate, with a view to assess the achievement of the actions and the impact of the actions taken of a NIAP against set milestones and indicators agreed under Step 2 3) vi) of the Guidelines:
- **PROPOSES** an additional draft decision to CoP20 directed to Parties and Observers as follows:

Decision 20.AA: Recognising the value and effectiveness of technical support to NIAP Parties in increasing reporting rates and reporting quality as outlined in the NIAP Review and SC78 Doc.33.13.2, Parties and other stakeholders are encouraged to contribute resources to enable the Secretariat to conduct technical missions to NIAP Parties which seek assistance for training on NIAP guidelines, guidance, templates and reporting obligations.

Doc. 39.1 Wildlife crime enforcement support in West and Central Africa: Report of the intersessional working group

The Document flags that only three Parties responded to the questionnaire circulated to explore the issue of funding. Two online meetings of the Working Group resulted in a very low level of participation by Parties, including the proponents, as a result of which the Chair, with support from those Working Group members that did attend, determined it would not be appropriate to continue discussions without the participation of the concerned Parties.

On the issue of an enforcement fund, given the existence of significant funds to support both compliance under CITES and enforcement against illegal wildlife trade, it is not necessary to create an additional CITES enforcement fund providing targeted and sustainable financial support to combat wildlife crime. The establishment and management of any new fund would require additional funding and burden upon human resources and administration costs. It is, however, essential to publicise available funding mechanisms and initiatives so that Parties can access and apply for funds to tackle wildlife crime.

EIA recommends that the Standing Committee:

- **NOTES with concern the limited engagement by Parties in the Working Group meetings, particularly those Parties from West and Central Africa. This low level of participation significantly impeded the ability of the group to achieve its objectives**
- **NOTES with concern the low number of responses to the questionnaire distributed by the Chair of the Working Group available in Annex 3 to document SC77 Doc. 39.4**
- **ADOPTS draft Decisions 20.AA to 20.CC as presented in the Annex of Doc 39.1.**

Doc. 39.2 Wildlife crime enforcement support in West and Central Africa: Report of the Secretariat

The Secretariat notes that wildlife crime affecting Parties in West and Central Africa continues to be of concern. Of 26 Parties approached to provide reports on the Decisions, only four in West and Central Africa responded. Meanwhile, only two Parties importing CITES specimens from West and Central Africa made submissions. This low reporting rate has resulted in very limited information which hampers a comprehensive analysis of the implementation of these Decisions. It is also worth noting that there was a very low level of participation by Parties at the two online meetings of the Working Group as highlighted in Doc. 39.1.

Regional and international cooperation is vital for the protection of species exploited for illegal trade and essential to combat organised wildlife crime. Decision 19.84 a) and b) strongly encouraged Parties in West and Central Africa and Parties importing CITES specimens from West and Central Africa to improve their collaboration to tackle wildlife trafficking by using existing secure communication channels provided by INTERPOL and the WCO. Despite the considerable number of capacity-building and cooperation events reported in SC78 Doc 39.2, there is no information on the extent to which INTERPOL and WCO channels, or the provisions under UNTOC, are used for enforcement or the exchange of illegal trade information.

Furthermore, there has been limited law enforcement cooperation between countries in West and Central Africa and destination countries in South-East Asia despite ongoing illegal trade activities since CoP19. For example, between 2023-24, approximately 10 tonnes of ivory were confiscated in Vietnam, shipped from Nigeria and Angola. Yet neither Angola nor Nigeria reported pursuing cooperation with Vietnam to conduct investigations or target the wider networks responsible for these shipments. In addition, a Memorandum of Understanding (MoU) on combating the illegal wildlife trade between Nigeria and Vietnam – two primary hotspots for wildlife trafficking – has been awaiting finalisation for more than two years.

Similarly, no information relating to illegal trade in CITES-listed tree species was provided by the only six Parties (Benin, Nigeria, Senegal, Thailand, Togo and the US) which made submissions. The implementation of the measures and activities outlined in the Outcome document of the Task Force on illegal trade in specimens of CITES-listed

tree species is also not clearly incorporated in Resolution Conf. 11.3 (Rev. CoP19) on *Compliance and enforcement* as determined by the Secretariat. Furthermore, according to SC78 Doc. 33.2, a number of Parties in West and Central Africa (The Gambia, Guinea-Bissau, Mali, Nigeria, Cameroon, the Central African Republic, Chad and Togo) are still subject to the expedited application of Article XIII on West African rosewood (*Pterocarpus erinaceus*), indicating non-detriment findings for trade in these species from these countries are still not meeting the requirements of the Secretariat and the Chair of the Plants Committee.

EIA recommends that the Standing Committee:

- **REJECTS the Secretariat's recommendation to CoP20 to delete Decisions 18.90 (Rev. CoP19), 19.84, and 19.85 as these Decisions have not been implemented; the report indicates that only six Parties reported on implementation of the Decisions and limited information has been provided regarding collaboration and communication to tackle illegal wildlife trade affecting West and Central Africa**
- **RENEWS and updates Decision 18.90 (Rev. CoP19), 19.84, and 19.85**
- **RENEWS Decision 19.87 and 19.88 with an additional requirement for the Secretariat to request INTERPOL and the World Customs Organization (and other ICCWC members that may gather such data) to gather data and report on the number of information reports submitted by each Party, as strongly encouraged under Decision 19.84 paragraphs a) and b) and report to the 81st meeting of the Standing Committee**

Doc. 42 CITES Big Cat Task Force

The Secretariat reports on the implementation of Decisions 19.92 and 19.92 on the CITES Big Cats Task Force which was convened in Entebbe, Uganda from 24-28 April 2023, the outcomes from which are published on the CITES website. The Secretariat also reports that there is insufficient support from Parties for the development of a common resolution for all big cats or a revision of Res. Conf. 12. (Rev. CoP19) to encompass all big cats and invites the SC to agree not to pursue the matter further at this time. The Secretariat recommends that the SC agree to submit draft decisions to CoP20 which would track the implementation of the outcomes of the CITES Big Cats Task Force by Parties.

EIA recommends that the Standing Committee adopts the recommendations in the document.

Doc. 43.1 Asian big cats: Report of the Secretariat

The Secretariat reports on the implementation of Res. Conf. 12.5 (Rev. CoP19), Decision 19.109 and Decisions 18.100, 18.101, 18.103 (Rev. CoP19), 18.105, 18.106, 18.107 (Rev. CoP19) and 18.109 (Rev. CoP19). The Secretariat also reports on the SC's recommendation from SC77 requesting information from Parties on conservation measures, poaching incidents and seizures involving leopards in their Asian range and instructing the Secretariat to develop country-specific recommendations where possible.

The document summarises Party responses received by the Secretariat. However, the document does not contain a meaningful review of the conservation status and illegal trade of leopards. Neither has the Secretariat developed any country-specific recommendations for the SC to consider. Leopards are the Asian big cat species most frequently recovered in seizures and, as noted in Annex 4 to document CoP18 Doc. 71.1, leopards are the only large felid for which the global conservation status has deteriorated significantly in recent years.

In 2016, historical range loss for Asian leopards was estimated to be between 83-87 per cent.¹⁰ In South-East Asia, an estimate quoted in the IUCN's 2022 assessment for the species indicated a drastic reduction of more than 80 per cent in ranges where leopards are considered extant compared to 2008.¹¹ The 2023 IUCN assessment identifies targeted poaching for the wildlife trade and snaring for bushmeat as the greatest factors contributing to this collapse in the leopard's South-East Asian range.¹² During this period, leopards have gone extinct in Laos and Vietnam and functionally, if not fully, extinct in Cambodia.¹³ Against the backdrop of these drastic declines, the comparatively few reported cases of enforcement action from the leopard's South-East Asian range in this period is cause for serious concern.

To the best of our knowledge, China is the only Asian range State that has a licensed legal market for leopard bone products. 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 it.¹⁴ Annex 4 to document CoP18 Doc. 71.1, which is referred to in Decision 18.105 (Rev. CoP19), 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.¹⁵

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.¹⁶ Given that leopards are not known to be bred in captivity at scale, that the leopard population in China is relatively small and that leopards have been listed on CITES Appendix I since 1975, it is unclear how procurement for these products continues to be met through legal supplies.

Despite the availability of leopard seizure data in the UNODC World WISE database and in Party illegal trade reports, the Secretariat's report does not review this data in light of declining leopard populations in Asia. We recommend that the SC continues to retain its focus on the conservation status of and illegal trade in Asian leopards.

The Secretariat has recommended the deletion of Decisions 19.109, 18.100, 18.101, 18.103 (Rev. CoP19), 18.105, 18.106, 18.107 (Rev. CoP19) and 18.109 (Rev. CoP19) on the basis that they are incorporated in Res. Conf. 12.5 (Rev. CoP19) or the outcome document of the CITES Big Cats Task Force. However, decisions 18.100, 18.101 and 18.105 refer to specific concerns raised in Annex 4 to document CoP18 Doc. 71.1 and there is little evidence that these concerns have been addressed. For example, that document refers to tourist markets in Mong La in Myanmar and the Golden Triangle Special Economic Zone in Laos contributing to illegal cross-border movement of Asian big cat specimens, but none of the relevant country reports on Decision 18.101 have addressed these specific concerns to date.

With some notable exceptions, Res. Conf. 12.5 (Rev. CoP19) and associated decisions have been affected for several years by low levels of responses or non-specific responses by Parties. EIA appreciates that the reporting burden on Parties and the administrative burden on the Secretariat may be high. However, the current system for monitoring implementation of Res. Conf. 12.5 (Rev. CoP19) and associated decisions does not provide the Parties with the best available information or analysis based on which to make decisions on Asian big cats. While it may involve more external resources, we are of the view that a more independent assessment such as the one in place for rhinos under Res. Conf. 9.14 (Rev. CoP19) would lead to better results for Asian big cats.

EIA recommends that the Standing Committee adopts the recommendations in the document with the following additional recommendations:

- **ENCOURAGES Asian range states of leopards to report on the national conservation status, threats, poaching and seizure incidents involving the species and any legal domestic markets for commercial trade of leopard specimens within their territory as part of the Res. Conf. 12.5 (Rev. CoP19) reporting process**
- **PROPOSES that the CoP consider, subject to external resources, a regular review mechanism on progress of implementation of RC 12.5 (Rev. CoP19) and associated decisions similar to the one for rhinos in Res. Conf. 9.14 (Rev. CoP19).**

Doc. 43.2 Asian big cats in captivity

The Secretariat reports on the implementation of Decisions 14.69, 18.102, 18.108 (Rev. CoP19) and 18.109 (Rev. CoP19) and the missions it has conducted to the USA and China to gain an understanding of facilities keeping tigers which may be of concern. The Secretariat has already conducted similar missions to the Czech Republic, South Africa, Laos, Vietnam and Thailand and the SC has made various general and country-specific recommendations to implement Decision 14.69 and paragraph 1.h) of Res. Conf. 12.5 (Rev. CoP19) which are presented in Annex 1 of the document.

The Secretariat reports that at the time of its mission there were a total of 2,744 captive tigers in China in 36 facilities. This is a precipitous decline from the numbers in the report from SC70 in October 2018 commissioned by the Secretariat, which estimated a total of 6,057 captive tigers in 209 facilities in China.¹⁷ Previously in 2010, China stated in an information document submitted at CITES CoP15 that there were 5,000-6,000 in the country.¹⁸ In December 2013, China reported to CITES that there were more than 5,000 captive tigers in the country, mainly held in two facilities.¹⁹ No explanation is provided in this document for this reported major decline in captive tiger numbers in China. It is also worth noting that tigers have continued to be bred in China, with the Secretariat reporting a total of 289 cubs born since 2019 at the three facilities it visited.

EIA is of the opinion that there is a lack of clarity in the document regarding China's legislative provisions on breeding and trade of tigers. At one point, the Secretariat reports that a May 2024 notification "includes the suspension of permits for the captive-breeding of terrestrial wild animals, such as tigers". Further on, the Secretariat states that while "some facilities voluntarily restrict the breeding to limit the captive population, there is no legal requirement in place prohibiting breeding."

The May 2024 notification in question appears to have been issued by the National Forestry and Grassland Administration of China in response to the death of 20 Siberian tigers and other wild animals at a facility without the requisite licenses in Fuyang, Anhui province.²⁰ The notification, which is titled a notice of the NFGA "on launching a

special campaign to regulate the artificial breeding of tigers and other terrestrial wild animals”²¹ states that a “special rectification campaign” will be carried out on the artificial breeding of tigers from the date of the notice up to 30 September 2024. During this period, the notification states that the acceptance of applications for artificial breeding would be suspended. It would thus appear that the suspension of breeding permits is a suspension for issuance of new permits (and not a suspension of permits already issued) and that it is temporary, i.e., during the period of the special campaign.

With regard to trade of tigers, Annex 4 of the document which summarises the relevant legislative provisions of China mentions that a 1993 circular banning the trade, transport and medicinal use of rhino horn and tiger bone was re-enforced in 2018. EIA would like to highlight that in 2018, a China State Council notice effectively sought to create an exception to the 1993 ban on the use of tiger parts to allow the use of farmed tiger bone in “eligible hospitals”.²² Following a public outcry, the State Council Executive Deputy Secretary stated that the notice would be implemented after a “study” and that the “three strict bans”, i.e., the ban on import and export of tigers and their byproducts, the ban on sale, purchase, transport, carrying and mailing of tigers and their byproducts and the ban on use of tiger bone in medicine would continue.²³

The Secretariat’s report indicates that since 2018, there has been a total prohibition on the movement, transport and trade of tiger specimens in China, both dead and alive, including between zoos and Government facilities, which has impacted the exchange of live animals for the conservation breeding of the South China tiger. It is not clear from the Secretariat’s report where this total prohibition stems from. The 2018 State Council notice referred to above indicates that the sale, purchase, use, import and export of tigers can be licensed under special circumstances in accordance with the law and specifically mentions approvals for scientific research. The CITES Trade database also records the import of both live and dead tiger specimens into China in the years 2019 and 2020.

EIA notes the positive legislative developments in the US through the passing of the Big Cat Public Safety Act, 2022 and in China through the May 2024 NFGA notification with the caveat that this appears to be a temporary measure. However, the US and China continue to remain the countries with the highest population of captive tigers and the Secretariat notes there are facilities keeping tigers in these countries which are not contributing to the conservation of wild tigers.

While the SC has already adopted country-specific recommendations in the case of Thailand, Laos and Vietnam urging these Parties to restrict breeding to levels supporting conservation or prohibiting the establishment of new facilities, the Secretariat has not suggested similar country-specific recommendations for China and the US. In the interests of proportionality and fairness, EIA is of the view that similar recommendations are appropriate for the US and China. In the case of China, EIA is also concerned at the levels of stockpiles of tiger bones and skins which are being stored by facilities, the security risk that this brings and the purpose of continuing to store such large stockpiles, given the history of licensed domestic trade in captive-bred tiger parts. EIA accordingly suggests that the SC adopts certain further country-specific recommendations in addition to those proposed by the Secretariat in paragraphs 59.d) and e) of the document.

Lastly, since the SC will have made several country-specific recommendations in its implementation of Decision 18.109 (Rev. CoP19), we feel it is important for the relevant Parties to report on these and for the SC to monitor their implementation. Accordingly, we propose slight changes to the draft decision in Annex 2 of the document to incorporate this. EIA is also concerned about the usage of the words “large numbers of tigers” in the draft decision in Annex 2 and would suggest deletion of these words or appropriate modification since the current process has taken into account that it is not simply large numbers of tigers which may cause a facility to be of concern but also involvement in illegal trade, irrespective of the number of tigers housed in it.

EIA recommends that the Standing Committee:

- **ADOPTS the recommendations in the document with the following amendments to paragraph g) of draft decision 20.AA in Annex 2 of the document:**

[“report on the implementation of this approach and in the case of the relevant countries, report on the implementation of the country-specific recommendations made by the Standing Committee at SC77 and 78 in their response to the Notification to the Parties issued by the Secretariat on Asian big cats \(Felidae spp.\) to facilitate reporting as required in Resolution Conf. 12.5 \(Rev. CoP19\) on Conservation of and trade in tigers and other Appendix-I Asian big cat species.”](#)

- **ADOPTS the following additional recommendations:**

1) Urging China to:

i) restrict the breeding of tigers in captive facilities and the importation of tiger to these facilities to levels supportive only to conserving tigers

ii) prohibit the establishment of new facilities keeping tigers in captivity with narrow exemptions where warranted

iii) consolidate and ensure adequate control of stockpiles of tiger parts and derivatives, and where possible destroy the same, with the exception of those used for educational and scientific purposes.

2) Urging the USA to:

i) restrict the breeding of tigers in captive facilities and the importation of tiger to these facilities to levels supportive only to conserving tigers

ii) continue to report on the implementation of the Big Cat Public Safety Act 2022 as part of its reports on implementation of Res. Conf. 12.5 (Rev. CoP19).

- SEEKS clarity from China on the discrepancy between the number of captive tigers in the country reported in this document and previous CITES reports and the purpose of retaining stocks of parts and derivatives. If such clarity is not achieved at SC78, we recommend that the Secretariat seeks clarity on the matter and report to SC79.

Doc. 45 Rhinoceroses (Rhinocerotidae spp.)

The Secretariat provides summaries of the information received from the Parties that reported on their implementation of Decisions 18.116 and 19.115-19.119 and SC77 recommendations, as well as an update on Decision 19.120 which directs the Secretariat to convene a meeting of the CITES Rhinoceros Enforcement Task Force.

Given the breadth of information contained in this document and in rhinoceros agenda items at recent meetings of the Standing Committee, EIA encourages SC78 to consider whether future meetings of the Standing Committee should include multiple rhino agenda items (similar to elephants and Asian big cats) that are focused on specific issues, e.g. stockpiles, enforcement and/or live trade. While EIA is cognizant of the ever-growing Standing Committee agenda, creating multiple rhino agenda times would give Parties the opportunity to adequately consider the detailed and critically important information on rhinoceros issues made available to each Standing Committee and formulate appropriate recommendations.

CITES Rhinoceros Enforcement Task Force

EIA is disappointed that the CITES Rhinoceros Enforcement Task Force did not meet in 2024 despite the US, UK and EU providing the necessary funding to implement the decision by SC77 in November 2023. We welcome the Secretariat's update that the Task Force will meet in the first half of 2025 and look forward to contributing to the meeting.

Decision 18.116, South Africa, and Commercial Domestic Rhino Horn Markets

In South Africa's report on its implementation of Decision 18.116, which calls for rhino horn demand reduction programmes and the closure of markets that contribute to poaching or illegal trade, South Africa notes that it is in the process of developing a revised national biodiversity management plan (BMP) for its rhinos. The draft BMP published in June 2024 includes a suite of proposals to develop a domestic commercial rhino horn market in South Africa and to actually *increase* demand for rhino horn. Along with the draft BMP, South Africa published a draft national biodiversity economy strategy last year which also proposes creating a domestic rhino horn industry and market and it explicitly calls for targeting tourists from Asian countries as the main consumers of rhino horn products such as medicines and souvenirs.

EIA has serious concerns about South Africa's proposals for creating a commercial rhino horn industry. A commercial domestic rhino horn market in South Africa – especially a market targeted at foreign tourists – would have major international enforcement implications and would directly contravene Decision 18.116 and Resolution Conf. 9.14 (Rev. CoP19), specifically paragraph 2(e)(i) which urges Parties to as a matter of priority **develop and implement well targeted strategies for reducing the use and consumption of rhinoceros parts and derivatives, with the aim of achieving measurable change in consumer behaviour** [emphasis added].

We strongly urge the Standing Committee to adopt a recommendation requesting South Africa to provide details on any plans, including private sector initiatives, to establish a domestic commercial rhino horn market and industry to the Secretariat for inclusion in its report to CoP20.

We further urge the Standing Committee to remind Parties of the demand-reduction obligations for rhino parts and derivatives in accordance with CITES Resolution Conf. 9.14 (Rev. CoP19).

Non-reporting by China, Mozambique and Namibia

EIA is concerned by the failure of China, Mozambique and Namibia to report on implementation of the CoP Decisions and SC77 recommendations directed at these Parties. China is the primary destination of rhino horn trafficked out of Africa and Asia and its engagement in CITES processes aimed at tackling the ongoing poaching and trafficking crisis affecting rhino populations globally is paramount. Namibia continues to experience high levels of rhino poaching, especially of the Critically Endangered black rhino. This species experienced a population decline for the first time in more than a decade, which the IUCN African Rhino Specialist Group attributes to poaching losses in Namibia and South Africa.²⁵ With respect to Mozambique, the Secretariat extracted some relevant details from Mozambique's NIRAP report, but this information does not constitute an adequate response.

It is critical that these three Parties provide detailed reports on the implementation of the CoP decisions and Standing Committee recommendations directed at them to provide all Parties with a clear picture of the ongoing rhino conservation and enforcement landscape so that the Standing Committee can make appropriate decisions informed by the most recent and relevant information. EIA urges the Standing Committee to direct China, Mozambique and Namibia to submit reports to the Secretariat in advance of SC79, irrespective of any oral reports or information documents provided at SC78. If no reports are submitted, the Standing Committee is encouraged to consider appropriate measures in line with Resolution Conf. 14.3 (Rev. CoP19) on compliance procedures.

Inadequate reporting on implementation of CoP Decisions and SC77 Recommendations

EIA appreciates the detailed information shared by Vietnam but is disappointed by the lack of substantive reporting from Angola, Botswana and the UAE. Angola submitted a brief one-page report in which it suggests that because it does not have a wild rhino population there is no need to appoint a focal point for inclusion in the *CITES directory on illegal trade in rhinoceros horn focal points*. The only data Angola provided on rhino horn trafficking enforcement is a table of rhino horn seizures made from 2018-24. We note that the report on African and Asian Rhinoceroses by the IUCN African and Asian Rhinoceros Specialist Groups and TRAFFIC to CoP19 lists Angola as a range state for the southern white rhino, albeit with a very small population, and that recent media reports mention the translocation of live white rhinos from Namibia to Angola. Most importantly, Angola is a recognised transshipment centre for rhino horn trafficked out of southern Africa to Vietnam. EIA therefore strongly supports the Secretariat's recommendation for Angola and Vietnam to strengthen engagement on rhino horn trafficking and we further recommend that Namibia be included in this recommendation as both public and non-public reports indicate rhino horn is moving from Namibia into Angola before export to Asia.

The report from the UAE contains little relevant information to its implementation of Decision 19.119 and instead includes details about activities it has supported in the Amazon and Congo Basin. The UAE remains an important transit country for rhino horn and EIA recommends that the Standing Committee adopts a recommendation requesting the UAE to provide a supplemental report on its implementation of Decision 19.119 with substantive details on how it is collaborating with other Parties to prevent rhino horn trafficking.

Sharing DNA samples of seized rhino horn for forensic analysis

Throughout the document, the Secretariat highlights the minimal sharing of DNA samples from seized rhino horn for forensic analysis using the Rhino DNA Indexing System (RhODIS). EIA agrees that it is important for all Parties to share DNA samples of seized rhino horn for analysis by RhODIS in South Africa, including rhino horn seized in locations other than a port of entry, and we support the Secretariat's recommendation in this regard with amendments (*see below*).

However, it is unclear how South Africa uses the samples it receives and, in EIA's discussions with other Parties that have shared samples to South Africa, they have reported receiving minimal information back other than whether a DNA match was made. By making information available to Parties on the application of rhino horn DNA forensic samples for enforcement purposes, Parties may be more willing to regularly share DNA samples as part of standard operating procedures in rhino horn trafficking cases.

EIA recommends that the Standing Committee adopts a recommendation inviting South Africa to share details on how it uses DNA samples it receives from rhino horn seized abroad, including information on how the samples may inform intelligence-led investigations and on any enforcement successes to which such samples contributed, and reports this information at the CITES Rhinoceros Enforcement Task Force meeting later this year.

Live rhino exports from Namibia to the United States

In October 2024, Namibia exported 39 live southern white rhinos from a private farm to three buyers in Texas, US. At least one of the American importers is a safari-style private zoo which requires visitors to purchase tickets to gain entry.²⁶ It would appear that, for at least some of the white rhinos traded to the US, this trade was for commercial purposes, which contravenes the annotation for Namibia's southern white rhino population listed on Appendix II. The annotation specifies that Namibia's southern white rhinos are included on Appendix II "for the exclusive purpose of allowing international trade in live animals for in-situ conservation only, and only within the natural and historical range of *Ceratotherium simum* in Africa. All other specimens shall be deemed to be specimens of species included in Appendix I and the trade in them shall be regulated accordingly."

While the Namibian Government has released additional information about the exports and promulgated new regulations in an effort to prevent similar transactions from occurring in the future, the US has provided no details on the buyers, destinations or intended use of the rhinos. EIA recommends the Standing Committee request the US and Namibia to provide additional details on this transaction to the Secretariat, and for the Secretariat to include the information received in its report on rhinoceroses to CoP20.

EIA recommends that the Standing Committee:

- **REQUESTS South Africa to provide details on any plans, including private sector initiatives, to establish a domestic commercial rhino horn market and industry, including how these processes will avoid an increase in demand, illegal killing and enforcement complications, to the Secretariat for inclusion in its report to CoP20**
- **REMINDS Parties affected by illegal killing of rhinoceroses and the trafficking of rhinoceros horns of their demand reduction obligations for rhino parts and derivatives pursuant to CITES Resolution Conf. 9.14 (Rev. CoP19)**
- **RECOMMENDS that CoP20 renews Decision 18.116**
- **DIRECTS China and Mozambique to submit a report on their implementation of Decision 19.118 and Namibia to submit a report its implementation of the SC77 recommendation d), to the Secretariat for consideration by SC79. If no reports are received, the Standing Committee is encouraged to consider appropriate actions in accordance with Resolution Conf. 14.3 (Rev. CoP19) on compliance measures**
- **INVITES South Africa to share information on how results from RhODIS analyses of samples of rhino horn seized abroad contribute to law enforcement efforts, including details on how the samples may inform intelligence-led investigations and on any enforcement successes to which such samples contributed, and report this information at the meeting of the CITES Rhinoceros Enforcement Task Force**
- **DIRECTS Angola and the UAE to submit relevant supplemental information on their implementation of SC77 recommendation d) and Decision 19.119, respectively, to the Secretariat for inclusion in its report to CoP20**
- **SUPPORTS the Secretariat's recommendations in paragraph 70 with the following amendments to recommendations a) and b):**
 - a): request the Parties to which Decisions 19.117, 19.118 and 19.119 are directed to take the observations and conclusions of the Secretariat into consideration in their implementation of these respective Decisions and report on any activities conducted in this regard to the Secretariat for inclusion in its report to CoP20.
 - b): "encourage Angola, Namibia and Viet Nam to strengthen their engagement and to pursue information and intelligence exchange, as well as joint operations, to address rhinoceros specimen trafficking affecting them and report on any activities conducted in this regard to the Secretariat for inclusion in its report to CoP20."
- **REQUESTS the United States and Namibia to share information on the import of live rhinos from Namibia into the US in 2024, including details on the destinations and intended use of the rhinos, to the Secretariat for inclusion in its report to CoP20.**

Doc. 53 Stocks and stockpiles

EIA supports most recommendations in Doc. 53. However we recommend the Standing Committee makes further edits to improve the proposed definition of stockpiles contained in recommendation c). As currently written, the exclusion of personal stockpiles held for non-commercial purposes is problematic in that it may provide cover for non-reporting of significant stockpiles of CITES-listed species.

We recommend amending the second sentence in the proposed definition of stockpiles to read as follows:

"Specimens included in permanent collections held by museums, scientific institutions for non-commercial purposes, or individuals as personal or household effects, are excluded from the definition."

According to Resolution Conf. 13.7, personal or household effects by definition are kept for non-commercial purposes and constitute small quantities of items that could be carried in personal baggage, such as a family heirloom. This change to the definition would provide additional clarity to Parties when determining whether CITES items kept by individuals may or may not constitute a stockpile.

EIA recommends that the Standing Committee:

- **AMENDS the proposed definition of "stockpiles" as follows:**

"In the context of CITES, 'stockpiles' refer to any quantity of accumulated dead specimens, including parts and derivatives, of CITES-listed species held by public or private entities. Specimens included in permanent collections held by museums, scientific institutions for non-commercial purposes, or individuals for non-commercial purposes as personal or household effects, are excluded from the definition. In general, provisions related to stockpiles in CITES Resolutions and Decisions are intended to ensure that these are secured, managed and disposed of in such a way that the specimens would not enter or re-enter illegal trade."

Doc. 54 Stocks and stockpiles (elephant ivory)

Ivory stockpiles worldwide constitute enforcement burdens and continue to pose a serious threat to elephants through leakage into illegal trade and perpetuating demand. The actual level of ivory stockpiles globally is likely to be much higher than what has been made available to the Secretariat, given that stockpile reporting obligations under Resolution Conf. 10.10 (Rev. CoP19) are not comprehensively implemented by Parties.

Decisions 18.184 and 18.185 remain important for ensuring accountability of Parties with ivory stockpiles and EIA recommends that the Standing Committee rejects the Secretariat's recommendations for their deletion and instead supports renewal of Decisions 18.184 a) and 18.185.

EIA further recommends strengthening recommendation a) in Doc. 54, which singles out African elephant range states to step up reporting on ivory stockpiles. We urge the Standing Committee amends this recommendation to change "in particular African elephant range states" to "in particular, Parties in the NIAP process, Parties where ivory seizures or confiscations were reported to ETIS and elephant range States."

Finally, we support the proposed revisions to Resolution Conf. 10.10 (Rev. CoP19) but urge the Standing Committee to recommend additional amendments to new paragraph f) so that the Resolution calls for the disposal of ivory stockpiles non-commercially, when appropriate.

EIA recommends that the Standing Committee:

- **REJECTS recommendation e) and RECOMMENDS the renewal of Decisions 18.184 (Rev. CoP19) and 18.185 (Rev. CoP19)**
- **ADOPTS recommendation a) with the following amendment:**

"encourage Parties, in particular African elephant range States Parties in the NIAP process, Parties where ivory seizures or confiscations were reported to ETIS and elephant range States, to step up their efforts to implement paragraph 7 e) of Resolution Conf. 10.10 (Rev. CoP19) on *Trade in elephant specimens* concerning stockpiles, with a view of submitting the required information to the Secretariat every year"

- **SUBMITS the amendments to Resolution Conf. 10.10 (Rev. CoP19) contained in Annex 1 with the following amendment to new paragraph f)**

"ensure that adequate funding, capacity building and training are available to ensure ivory stockpiles are inventoried, secured, and when appropriate, disposed of properly non-commercially."

Doc. 65.4 Domestic ivory markets

Doc. 65.4 provides updates from the Secretariat on Decisions 19.99 to 19.101 on *Ivory seizures and domestic ivory markets* and 18.117 (Rev. CoP19) to 18.119 (Rev. CoP19), on *Closure of domestic ivory markets*. The Secretariat recommends that the Standing Committee agrees all Decisions on domestic ivory markets (DIMs) have been

implemented and can be deleted.

The Decisions pertaining to DIMs are intended to support the implementation of Resolution Conf. 10.10 (Rev. CoP19) paragraph 5, which “URGES those Parties in whose jurisdiction there is a legal domestic market for ivory that is contributing to poaching or illegal trade and that have not closed their domestic ivory markets for commercial trade in ivory to implement the above recommendation as a matter of urgency.”

For almost a decade, the recommendation to close domestic ivory markets contributing to poaching or illegal trade, established in Resolution Conf. 10.10 (Rev. CoP19) in 2016, has bolstered the 1989 ban on international commercial trade in ivory. Decisions 18.117 to 18.119 are intended to hold those Parties with legal domestic ivory markets accountable by requiring them to report on measures they are taking to ensure their legal domestic ivory markets are not contributing to poaching or illegal trade. EIA recommends that the Standing Committee recommends that CoP20 renews Decisions 18.117 to 18.119 to ensure countries with legal domestic ivory markets are in compliance with Resolution Conf. 10.10 (Rev. CoP19). The Standing Committee should emphasise the importance of these Decisions in bolstering the implementation of Resolution Conf. 10.10 (Rev. CoP19), address the low reporting and assess potential steps Parties should take to address their legal markets to strengthen the implementation of the Convention.

Decisions 19.99 to 19.101 are intended to assess whether a Party’s legal domestic ivory market is contributing to poaching or illegal trade and to support decision-making by the Parties pertaining to remaining legal markets. While there are certainly challenges in undertaking this analysis, including how to select Parties, examining the relationship between legal markets and illegal trade will provide insight into elements of the ivory trade that are not captured by current reporting. An analysis to examine the role of domestic markets was proposed by the Parties. The initial assessment was funded by the EU and Parties have engaged in order to achieve the goals of the decisions. It would be regrettable to opt to halt the analysis without fully exploring alternative means to fully implement the Decisions.

EIA believes an analysis of ivory seizures related to legal domestic ivory markets is feasible, important and that there are viable paths forward. As noted in Doc. 65.4, one member of the MIKE-ETIS Subgroup suggested assessing alternative approaches “such as including all Parties in a preliminary analysis that seeks to identify the correlation between the presence of ivory in domestic markets at any level and the presence of illegal ivory trade to better reveal the relationship between the two activities and help inform any priority areas for appropriate action.” EIA recommends that the Standing Committee establishes an intersessional working group to further evaluate the MIKE-ETIS Subgroup member’s suggestion and explore other options for conducting the analysis.

This analysis is crucial to shed light on the role that legal domestic ivory markets play in contributing to the illegal ivory trade. EIA remains concerned about Japan’s legal market for the commercial trade in ivory, which EIA has repeatedly documented as contributing to illegal international trade. In practice, Japan’s ivory trade exemptions are so broad that all ivory considered pre-Convention and all ivory imported during the two CITES-approved one-off sales can be legally traded. With large stockpiles of ivory, thousands of registered traders, pervasive loopholes in the trade controls and documented seizures of ivory from Japan made in other jurisdictions, Japan’s ivory market is ripe for abuse. Providing more information to Parties about ivory seizures linked to Japan will present valuable information on the role Japan’s market plays in the illegal international trade. EIA urges Parties to prioritise inclusion of Japan in the analysis of ivory seizures connected to Parties with legal domestic markets.

EIA recommends that the Standing Committee:

- **RENEWS Decisions 18.117 to 18.119 (Rev. CoP19) on reporting on DIMs that are not yet closed**
- **ESTABLISHES an intersessional working group to identify alternative approaches to complete the analysis of ivory seizures connected to each Party with a legal domestic market (Decision 19.99) and make recommendations for consideration by SC79 and CoP20**
- **INCLUDES assessment of the step-by-step approach proposed by a member of the MIKE-ETIS Subgroup in paragraph 20 of Doc 64.5**
- **PRIORITISES inclusion of Japan in any analysis of Parties with a legal domestic ivory market.**

Doc. 65.6 Trade in Asian elephants (*Elephas maximus*)

The IUCN Asian Elephant Specialist Group has identified poaching and illegal trade in parts and products (not limited to ivory) as a threat to the survival of Asian elephants. The indiscriminate nature of these trade threats affects not only male Asian elephants but also females and juveniles, presenting a disproportionate risk to this endangered species.

The last known study into the trade in Asian elephant parts and products was conducted in 2019. As a result, the

current nature, scope and scale of illegal trade threats facing the species remains uncertain. However, recent investigations by EIA indicate that illegal trade in raw and processed elephant skins persists online in the Greater Mekong Subregion. Advertisement counts have shown a significant increase from 2022-24, with a consistent year-on-year increase since 2020. Other parts available for sale online include elephant bone, tail, teeth and ivory. However, the full scale of illegal trade in Asian elephant parts and products remains unclear without further investigation and engagement from Parties and enforcement authorities appears to be limited.

The consistently low reporting rate by Parties against Decision 18.226 (in all its iterations) has exacerbated this issue. For instance, only three Parties reported to SC78 (Thailand, Japan and the US). This lack of reporting has left stakeholders with an incomplete understanding of the trade threats and, importantly, the ability and effectiveness of Parties to tackle the problem. Furthermore, to date, very little information regarding investigations into illegal trade of Asian elephants has been provided to CITES and none on online market investigations.

Given these gaps, EIA believes it is premature to consider these Decisions fully implemented and ready for deletion, as suggested by the Secretariat in Doc. 65.6. Instead, there is an urgent need for concerted international attention to renew and strengthen the above Decisions in order to address persistent knowledge gaps – which would be in line with the precautionary principle – and contribute to the conservation of this endangered species.

EIA recommends that the Standing Committee:

- **REJECTS the Secretariat's recommendation to delete Decisions 18.226 (Rev. CoP19), 19.107 and 19.108 as these have not been fully implemented**
- **RENEWS Decisions 18.226 (Rev. CoP19), 19.107 and 19.108 with amendments (see below)**
- **REJECTS the recommendation that the Secretariat will monitor the trade in Asian elephant specimens as this falls outside its mandate and would place the Secretariat under further capacity and resource constraints**
- **DIRECTS the Secretariat to continue dialogue with Asian elephant range states regarding the need for a regional database noting that response rates were disproportionately low for South Asia and as such not fully representative**
- **STRENGTHENS provisions relating to the disposal of carcasses in the draft registration system criteria in Annex I and mandates provision of information relating to the disposal and location of carcasses, to prevent laundering of parts and products into the illegal market**
- **ENCOURAGES Parties affected by illegal trade in Asian elephant specimens to scale up activities to address illegal online trade, including by drawing upon the support available through INTERPOL, the Wildlife Crime Linked to the Internet: Practical Guidelines for Law Enforcement Practitioners and, as appropriate, reviewing their implementation of the provisions under "Regarding wildlife crime linked to the Internet" in Resolution Conf. 11.3 (Rev. CoP19).**

Draft amendments to Decisions 18.226 (Rev. CoP19), 19.107 and 19.108

18.226 (Rev. CoP20)

Asian elephant range States and other All Parties involved in the trade in Asian elephants and their parts and derivatives are encouraged to:

- a) undertake, as necessary, investigations into the illegal trade in Asian elephants and their parts and derivatives, including online markets, and endeavour to enforce, and where necessary improve, national laws concerning international trade in specimens of Asian elephants with the explicit intention of preventing illegal trade;
- b) develop strategies to manage captive Asian elephant populations;
- c) ensure that trade in, and cross-border movements of, live Asian elephants are conducted in compliance with CITES, including the provisions in Article III, paragraph 3, for Asian elephants of wild origin;
- d) reconsider and collaborate in the development and application of a regional system for registering, marking and tracing live Asian elephants, requesting as necessary assistance from experts, specialized agencies or the Secretariat; and
- e) at the request of the Secretariat, provide information on the implementation of this Decision for reporting by the Secretariat to the Standing Committee.

19.107 (Rev CoP20)

The Secretariat shall:

- a) request a report from Parties on the implementation of paragraphs a) through d) of Decision 18.226 (Rev.

[CoP2019](#));

b) [acknowledging the incomplete understanding of the illegal trade threats to Asian elephants](#), subject to the availability of external funding [and in collaboration with range States and other relevant stakeholders, develop requirements for a registering, marking and tracing system for live Asian elephants, to be presented to Asian elephant range States with the aim of establishing a global system, or alternatively standardized national systems, for registering, marking and tracing live Asian elephants; and, commission a systematic study of the illegal trade in Asian elephant specimens; and](#)

c) [report any information provided in response to Decision 19.107 paragraph a\) and on the implementation of Decision 19.107 paragraph b, as well as the findings and recommendations concerning trade in Asian elephants and their parts and derivatives as appropriate, to the Standing Committee and the results of the study in Decision 19.107 paragraph b\) and make recommendations to the Standing Committee at its 81st meeting.](#)

19.108 (Rev. CoP20)

The Standing Committee shall consider at its 78th 81st meeting the information, findings and recommendations, as per Decision 19.107, paragraph c), and make recommendations to the Secretariat and to Parties, and report to the Conference of the Parties at its 20th 21st meeting, as appropriate.

Doc. 65.8 CITES dialogue meeting for African elephant range states

The current restrictions on live trade of African elephants under Annotation A10 paragraph b) are clearly delineated and easily interpreted. However, the amendments proposed to paragraph b) are ambiguous and require further interrogation to determine their intention and the implications for implementation.

The removal of the express reference to acceptable and appropriate destinations as defined in Res. Conf. 11.20 (Rev. CoP18) and to *in-situ* conservation programmes could possibly result in the export of elephants from these populations in question to captive facilities outside Africa under Appendix I procedures. For practical reasons and to avoid ambiguity, the proposed amendment to Annotation A10 paragraph b) should ensure that live trade in all populations from Appendix II countries is made subject to conditions set out in Res. Conf. 11.20 (Rev. CoP18), namely to appropriate and acceptable destinations.

Similarly, the proposed amendments to paragraph f) create unnecessary ambiguity as to the commercial or non-commercial nature of exports of ivory carvings from Zimbabwe. This is easily avoided by retaining the original language of paragraph f).

The purpose of the proposed technical workshop for African Elephant Range States as currently framed in the draft decisions should be amended to consider mechanisms for the conservation and management of elephants and ivory stockpiles, as this is in line with the purpose and objectives of the African Elephant Action Plan as well as the discussions of the Dialogue meeting as reflected in the formal communiqué from the Dialogue Meeting in Annex 2.

Clarity should also be sought as to what activities are being referred to as the 'other means' in draft decision 20AA paragraph b). To this end, non-consumptive/non-lethal commercial activities should be prioritised for consideration at the workshop to avoid the overreliance on consumptive commercial activities to fund elephant conservation. Commercial consumptive activities are unlikely to be sustainable in the long-term in light of the continental decline in African elephants and therefore are unlikely to generate sustainable revenue to fund conservation. On the other hand, non-consumptive and non-lethal activities such as ethical eco-tourism not only generate sustainable revenue but also create opportunities for scaling and long-term community beneficiation.

Given the number of Parties potentially involved, it is preferable that the Standing Committee has oversight of the workshop development process, including the Terms of Reference for the proposed consultant. Additional stakeholders, such as non-range State Parties, experts and observers should also be permitted to participate for transparency and information-sharing purposes.

The formal communiqué from the Dialogue Meeting in Annex 2 further outlines mechanisms to improve regional cohesion and coordination across the range states with the agreement for timely coordination meetings to be hosted by the African Union Commission (AUC) before and during the CoP with the objective of strengthening coordination and unity.

While attempts to improve collaboration and coordination regarding elephant conservation and management are welcomed, continental-wide unity is an unrealistic outcome given the distinct differences between range states' elephant populations, capacity, resources, challenges and priorities. Rather, efforts should focus on strengthening and improving coordination to jointly tackle key issues facing the conservation and management of elephants such as the

illicit killing of elephants and cross-border trafficking of ivory.

EIA recommends that the Standing Committee:

Regarding the proposed amendments to Annotation A10:

- **CLARIFIES that all trade in live African elephants from Appendix II populations (Namibia, Botswana, South Africa and Zimbabwe) must be in compliance with paragraph b) of Annotation A10 and not Appendix 1 and therefore is subject to the definition of 'appropriate and acceptable destinations' in Resolution Conf. 11.20 (Rev. CoP18)**
- **CLARIFIES the proposed amendment to paragraph f) of Annotation A10 will ensure that the exports of ivory carving from Zimbabwe will remain non-commercial and, if necessary, maintains the original language of the Annotation to avoid ambiguity.**

Regarding the proposed draft decisions on sustainable financing and the intention to convene a technical workshop:

- **AMENDS the draft decisions 20 AA to 20 DD to ensure the purpose of the proposed technical workshop is sustainable financing for 'conservation and management of elephants and management of ivory stockpiles', not 'sustainable management of elephants and ivory stockpiles'**
- **CLARIFIES draft decision 20AA paragraph b) as to what is meant by 'other means'**
- **ENSURES the convening of the workshop, including the appointment of the consultant and development of the Terms of Reference, is overseen by the Standing Committee and that participation and attendance at the workshop is open to experts, other Parties and observers.**

Doc. 67.1 Pangolins: Report of the Animals Committee

EIA commends the implementation of Decision 18.239 on developing conversion parameters for all pangolin species, noting collaboration between the Secretariat, the Species Survival Commission Pangolin Specialist Group of the International Union for Conservation of Nature, pangolin range states and financial contributions from France and the Pangolin Crisis Fund.

EIA recommends that the Standing Committee:

- **SUPPORTS the recommendation by the Animals Committee for Parties to use the conversion parameters presented in Table 1, paragraph 12 of SC78 Doc. 67.1 for law enforcement and court purposes where necessary**
- **ENCOURAGES Parties to use the identification materials listed in paragraph 19 of SC78 Doc. 67.1 to support identification of seized pangolin specimens at species level.**

Doc. 67.2 Pangolins: Report of the Secretariat

In 2024, EIA recorded a minimum of 15 tonnes of pangolin scales seized globally.²⁷ This represents an approximate three-tonne increase from 2023, a worrying indication of the continued illegal trade in pangolins. In light of this, only 11 Parties submitted annual reports to the Secretariat in line with paragraph 4 of Resolution Conf. 17.10 (Rev. CoP19).

EIA is concerned that the current level of reporting does not provide sufficient information to develop effective recommendations for the conservation of pangolins. In the Report of the Secretariat, only nine responses to Notification No. 2024/096 regarding Decision 19.202 on stockpile measures were noted. Furthermore, the contents of some responses did not satisfy the granularity of the questions put forward in the notifications. Of two of the countries with the largest pangolin scale seizures of 2024, Nigeria and Indonesia, neither submitted responses.

EIA supports the recommendation to align pangolin stockpile reporting with that of elephant ivory and rhinoceros horn stockpile reporting as this measure may encourage Parties to submit this essential information for consideration. EIA especially encourages responses from Parties which have recorded significant levels of illegal trade and seizure activity in recent years as the data currently available through past CITES documents may be outdated. EIA further supports the recommendation for the Secretariat to develop time-bound and measurable recommendations for Parties to implement Resolution Conf. 17.10 (Rev. CoP19), for consideration at CoP20.

EIA is also concerned that despite Resolution Conf. 17.10 (Rev. CoP19) urging for Parties to close domestic markets in

pangolins which contribute to the illegal trade, China continues to permit the use of pangolin scales in designated hospitals for the production of traditional Chinese medicines.²⁸ In 2024, China issued a notification stating that the annual consumption of pangolin scales would be controlled to approximately one tonne in principle.²⁹ China claims that the use of pangolin scales of illegal and unknown origins is prohibited, but has not publicly reported on the provenance of its pangolin stocks.³⁰ The Report of the Secretariat further references the 2024 World Wildlife Crime Report stating that China and Hong Kong were primary destinations for shipments of pangolin scales sourced from various countries in Africa.³¹ This indicates a high likelihood of trafficked pangolin scales entering China's stockpiles, which are in turn used for traditional Chinese medicines.

In SC78 Inf. 2 submitted by China, it was stated that inventory information of pangolin scales within the forestry and grassland system and other departments would be submitted to the CITES Secretariat by SC78.³² However, the Report of the Secretariat does not note any response from China to Notification 2024/096 relating to Decision 19.202 on measures to secure pangolin stocks. EIA therefore urges China to fulfil its original commitment to report to the Secretariat by SC78, respond to future notifications to continually provide public transparency and clarity regarding management of its pangolin stocks and to comply with Resolution Conf. 17.10 (Rev. CoP19) especially in regard to paragraph 1 d) on closing legal domestic markets.

EIA recommends that the Standing Committee:

- **SUPPORTS the recommendation to delete Decisions 18.239, 19.200 and 19.203 paragraphs a), b), e) and f) as they have been implemented**
- **SUPPORTS the amendment of Resolution Conf. 17.10 (Rev. CoP19) paragraphs 3 and 13 a) to align pangolin stockpile reporting with that of elephant ivory and rhinoceros horn stockpile reporting, as presented in the annex of SC78 Doc. 67.2**
- **URGES Parties, especially those which have had significant illegal trade and seizure activity in recent years, to report to the Secretariat in line with Resolution Conf. 17.10 (Rev. CoP19), Decisions 19.201 and 19.202**
- **SUPPORTS the recommendation for the Secretariat to develop time-bound and measurable recommendations for Parties to implement the Resolution, for consideration at CoP20.**

Doc. 68.1 Saiga: Report by Kazakhstan

EIA supports the recommendations in Doc. 68.1 submitted by Kazakhstan and applauds Kazakhstan's efforts calling for improved saiga horn stockpile management and transparency. The lack of available data on saiga horn stockpiles in important consumer and trading countries is of particular concern, given that existing saiga horn stockpiles should have been exhausted years ago based on volumes of saiga horn stockpiles reported to CoP14 and on the level of legal trade that has occurred since then. EIA also remains concerned by the high levels of illegal saiga horn trade, which suggests the involvement of organised criminal actors.

EIA supports recommendations in this document, including the establishment of an intersessional working group on saiga with a mandate to include the issues listed in paragraph 21(d)(i). We further recommend that the Standing Committee adapts the language in recommendation b) to craft draft decisions to recommend for adoption by CoP20.

EIA recommends that the Standing Committee:

- **SUPPORTS the recommendations contained in paragraph 21**
- **PROPOSES the following draft decisions to CoP20:**

20.XX Range states of the saiga antelope (*Saiga spp.*) and important consumer and trading countries of saiga parts and derivatives shall report the level/volume of stockpiles of saiga specimens and their sources to the CITES Secretariat each year

20.XX Directs the Secretariat to compile the information received on saiga stockpiles and make it available to Parties in advance of the Standing Committee meetings

20.XX Directs the Standing Committee to consider the information on saiga stockpiles shared by the Secretariat and make recommendations as appropriate.

Doc. 68.2 Saiga: Report of the Secretariat

EIA is concerned by the ongoing trade in saiga specimens with source codes O and U. The use of these source codes reinforces the calls by Kazakhstan in Doc. 6.1 for transparency with respect to saiga horn stockpiles, especially in important consumer and trading countries. We echo comments made by WCS questioning the existence of specimens that are at least 34 years old now entering trade.

We urge the Standing Committee to adopt a recommendation for Parties to refrain from issuing export permits for trade in saiga specimens with source codes O or U until the Standing Committee is satisfied with information shared by saiga range states and important saiga consumer and trading countries on the volumes and management of their saiga horn stockpiles.

EIA recommends that the Standing Committee:

- **RECOMMENDS that Parties cease exports of saiga specimens with source codes O or U until the Standing Committee is satisfied with information shared by saiga range states and important saiga consumer and trading countries on the volumes and management of their saiga horn stockpiles.**

Doc. 77 Annotation #15

EIA acknowledges the Secretariat's key findings outlined in paragraph 8 c) of Doc 77 and Annex 1, which highlight persistent gaps in traceability and oversight, particularly concerning raw materials transitioning into exempted products. EIA also concurs with the report's additional key finding that inconsistencies in trade data for exempted and non-exempt specimens hinder the ability to accurately assess conservation outcomes and ensure compliance.

To underscore this issue, we would like to raise attention to an imminent report to be published by our Indonesian partner Kaoem Telapak (KT), which will be shared ahead of SC78. The report corroborates the identified gaps and highlights ongoing illegal logging and international export of *Dalbergia latifolia*, sourced from both wild and artificially propagated stands (and that their distinction can be ambiguous). Moreover, inconsistent trade data raises concerns that raw or unrefined timber could be laundered under the finished products exemption.

EIA recommends that the Standing Committee:

- **SUPPORTS the conclusions of the chapters and endorses the recommendations for further work on this topic**
- **AMENDS paragraph 2 of SC78 Doc. 77 – Annex 2 p. 8 on Reflections on future work as follows:** Traceability systems: Encourage range States to implement robust traceability systems for listed tree species ~~non-exempt raw materials~~ to ensure transparency and legal trade, especially for materials entering international supply chains.

Doc 84 (Rev. 1) Taxonomy and Nomenclature of African elephants (*Loxodonta spp.*)

As discussed at SC77, the science is clear that there are two species of African elephant – the African savanna elephant (*Loxodonta africana*) and the African forest elephant (*Loxodonta cyclotis*). While recognising that all the three Options proposed by the Secretariat are viable and ultimately would not lead to a decrease in protection of elephants, Option B (listing at a genus level) is the most appropriate option to endorse for several reasons.

Firstly, apart from the fact that Option B was the preferred option at SC77, a genus listing best reflects the Parties' original intention to ensure all African elephant populations are protected and will not result in additional species being listed. Secondly, a genus listing is consistent with Res. Conf. 9.24 (Rev. CoP17) Annex 3 and there are similar examples of genus-level listed species in the CITES Appendices. Thirdly, Option B will result in less of a burden for the Secretariat and the Parties, particularly from a permitting, reporting and enforcement level.

EIA recommends that the Standing Committee:

- **SUPPORTS proposed Option B: Listing at the genus level– *Loxodonta spp.* A preference for a genus listing was noted at SC77 due to the unambiguity of the science and would not result in a change of scope of protection for**

elephants. This option is most consistent with the original intention of Parties to list African elephants and will ensure continuity for reporting by Parties without increasing the reporting and enforcement burden for Parties that have both species

- **SUPPORTS** the Secretariat's conclusion that the genus could be listed as a nomenclature change and therefore no proposal to amend the Appendices would be required
- **SUPPORTS** the Secretariat's conclusion (paragraph 9) that "the analysis prepared from the data collected at MIKE sites should continue to be provided and analysed at the genus level so that trend analysis of datasets collected over past years, which CITES stakeholders have come to rely upon, can continue".

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1. See paragraphs 12, 13 and 14 of Article 3 of Lao PDR's CITES Decree. These paragraphs define the terms "carcass", "part" and "product" respectively which are used throughout the Decree to refer to the parts and derivatives of regulated species covered by the Decree. The definition of "product" in paragraph 14 of Article 3 appears to refer to the carcass or part of the animal used in a product rather than the actual product itself. None of these definitions include the stipulation that specimens which appear from an accompanying document, the packaging or a mark or label, or from any other circumstances to belong to a CITES-listed species shall also be covered. Additionally, the definitions of the terms "aquatic animal", "wild animal" and "wild plant" used in the Decree also do not seem comprehensive or clear enough. For example, wild plants are defined as those which grow in forests and water bodies which seems to exclude species which grow in areas such as deserts, grasslands, etc.
2. See generally Articles 10, 11, 12, 13, 14, and 16 of Lao PDR's CITES Decree. While the revised CITES Decree incorporates improvements in terms of setting out requirements for non-detriment and legal acquisition findings, there is still room for improvement in terms of the clarity of instructions to the MA and the SA to make these findings when required by the Convention and reject applications when their finding is negative. In Articles 11, 12 and 13 of the CITES Decree governing import, export and re-export respectively, the lack of distinction between the conditions for trade for each Appendix could also cause confusion.
3. See Annex 1, SC75 Doc. 9, available at <https://cites.org/sites/default/files/documents/SC75/agenda/E-SC75-09.pdf> [Accessed 20 January 2025].
4. See Order No 5/PM dated 8 May 2018, available at https://d2ouvy59p0d6k.cloudfront.net/downloads/new_wildlife_order_pm_05_unofficial_eng_translation.pdf [Accessed 20 January 2025]. Also see paragraph 13 of SC70 Doc. 27.3.1, available at <https://cites.org/sites/default/files/eng/com/sc/70/E-SC70-27-03-01.pdf> [Accessed 20 January 2025].
5. Paragraph 5 of Article 19 of Lao PDR's CITES Decree.
6. Paragraph 7 of Article 3 of Lao PDR's CITES Decree.
7. The Asia Pacific Group on Money Laundering states that particularly significant risks of wildlife crime are noted in Lao PDR from the farming of tigers and other exotic animals, the trafficking of exotic animal parts and animal products, and the acknowledgement that Lao PDR citizens receive high amounts of proceeds - APG 2023, Anti-money laundering and counter-terrorist financing measures – Lao PDR, Third Round Mutual Evaluation Report, p. 34, APG, Sydney, available at <https://apgml.org/members-and-observers/members/member-documents.aspx?m=a6c4a803-0e15-4a43-b03a-700b2a211d2e> [Accessed 20 January 2025]; EIA, 2015, Sin City: Illegal wildlife trade in Laos' Golden Triangle Special Economic Zone, available at <https://eia-international.org/wp-content/uploads/EIA-Sin-City-FINAL-med-res.pdf> [Accessed 20 January 2025]; Amanda Gore, Tracking Blood Money: Financial investigations into wildlife crime in East Africa, 2021, Global Initiative Against Transnational Organized Crime, available at <https://globalinitiative.net/wp-content/uploads/2021/08/GITOC-FSA-Obs-Tracking-blood-money-Financial-investigations-into-wildlife-crime-in-East-Africa.pdf> [Accessed 20 January 2025]; <https://www.theguardian.com/environment/2016/sep/27/revealed-how-senior-laos-officials-cut-deals-with-animal-traffickers> [Accessed 20 January 2025]; <http://www.monitor.co.ug/News/National/Foreigners-sent-for-trial-over-ivory/688334-4011216-ijtwsnz/index.html> [Accessed 20 January 2025]; <https://web.archive.org/web/20170412022354/http://vtc.vn/phong-su-kham-pha-tham-nhap-duong-day-buon-ho-tu-lao-ve-viet-nam-d314759.html> [Accessed 20 January 2025]; https://www.washingtonpost.com/graphics/2019/investigations/tiger-farms-poaching-laos/?utm_term=.ce9702fdda69 [Accessed 20 January 2025]; <https://vir.com.vn/man-receives-six-year-jail-term-for-transnational-wildlife-trading-73268.html> [Accessed 20 January 2025]; <https://e.vnexpress.net/news/news/three-jailed-for-trafficking-tiger-carcasses-from-laos-4042953.html> [Accessed 20 January 2025]; <https://home.treasury.gov/news/press-releases/sm0272> [Accessed 20 January 2025].
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