



**EIA BRIEFING – ASIAN BIG CATS**

**RECOMMENDATIONS FOR CITES COP17**

Below are comments and recommendations from the Environmental Investigation Agency, UK (EIA) on agenda items regarding Asian big cats for CITES CoP17. In addition to the comments enclosed herein, EIA as a member of the Species Survival Network (SSN) also supports and associates itself with the SSN position on Asian big cats. A summary of EIA’s recommendations is provided below followed by more detailed rationale.

Proposal /Document	EIA Recommendations	Rationale
<p><b>CoP17 Doc. 60.1 REPORT OF THE STANDING COMMITTEE</b></p>	<p><b>SUPPORT</b> the adoption of the draft Decisions presented by the Standing Committee, provide funding for the implementation of these Decisions, and call for their full implementation</p> <p><b>REQUEST</b> that the fifth draft Decision in Annex to CoP17 Doc. 60.1 regarding the review of implementation of Res. Conf. 12.5 (Rev. CoP16) and associated Decisions pay special attention to the leopard, snow leopard and clouded leopard trade</p> <p><b>NOTE</b> that the Secretariat has found little progress has been made in implementing Decision 14.69 and <b>CALL FOR</b> implementation of this Decision</p> <p><b>SUPPORT</b> the inclusion of Decision 14.69 in Res. Conf.12.5 (Rev. CoP16) in its entirety and if there are concerns regarding the definitions of certain terms in the Decision refer this matter to the IUCN Captive Breeding Specialist Group</p> <p><b>REJECT</b> the suggestion from the Secretariat that the scope of Decision 14.69 be included in the review under Agenda Item 32 (Implementation of the Convention relating to captive-bred and ranched specimens)</p>	<p>EIA is concerned about the recent increase in poaching of wild tigers in India and the escalating trade in captive tiger specimens and associated expansion of tiger farms and facilities that keep or breed captive tigers in Southeast Asia and China.</p> <p>A comprehensive package of draft Decisions on Asian big cats has been proposed by SC66 for adoption at CoP17 through which the Standing Committee is proposing a strong process to assess the trade from and through tiger farms and other facilities that keep or breed tigers. This process should if fully implemented address the trade in captive tiger specimens and it is therefore unnecessary to refer the question of Decision 14.69 to another working group.</p> <p>Trade continues to pose a serious threat to tigers as well as other Asian big cats for the same end uses with leopards constituting the bulk of the Asian big cat trade based on EIA records.</p>
<p><b>CoP17 Doc. 60.2 - PROPOSAL OF INDIA ON ASIAN BIG CATS</b></p>	<p><b>SUPPORT</b> the adoption of the draft Decisions proposed by India encouraging Parties to share images of seized tiger skins and carcasses</p>	<p>This method of identification of tigers can be used to support law enforcement efforts as it enables authorities to identify the locations the tiger was known to have frequented. Further the images requested do not constitute sensitive or confidential material. Indeed a similar recommendation has been adopted regarding sharing of ivory samples from large-scale ivory seizures for forensic analysis (Decision 16.83).</p>

CoP17 Doc. 60.1 - REPORT OF THE STANDING COMMITTEE

Facts and figures on trade levels

**Asian big cats include tigers, leopards, snow leopards, clouded leopards and Asiatic lions. Tigers are highly endangered.** In the absence of scientific national surveys completed across all tiger range States, it is challenging to estimate the global wild tiger population. Based on surveys that have been completed so far in India, Nepal, Bhutan, Bangladesh and Russia, there are approximately 3,066 tigers. Independent scientists in Indonesia believe that there are approximately 371 tigers in the country, although a full national estimate is due next year. Countries such as Thailand, Myanmar and Malaysia are yet to conclude their national surveys. The tiger populations of Cambodia, Laos and Vietnam are functionally extinct, while the wild tiger population in China continues to be perilously close to extinction. **It is thus likely that there are fewer than 4,000 wild tigers, representing a 96% population decline over the last 100 years.**

Trade continues to pose a serious threat to tigers and other Asian big cats. **Almost every body part of the tiger is traded by criminals for massive profit** - skins as decorative rugs for personal use or bribes, tiger bone wine as a prestigious gift and a virility product, meat as a delicacy, teeth and claws as charms and several other products are traded such as tiger skin wallets. **The main market for tiger products is China and there is a market for a medicinal tiger bone 'glue' in Vietnam. Chinese buyers are consuming and purchasing tiger bone wine and other body parts in markets primarily catering to Chinese in Myanmar, Laos, and Vietnam.** Tiger products are also available for sale on social media platforms such as Facebook and WeChat.

*Below: Various brands of wine allegedly manufactured from tiger bone are available for sale in China, Laos, Myanmar, North Korea and Vietnam.*



Organised criminal networks are profiting from the tiger trade which involves repeat offenders and networks operating across borders. These networks are also engaged in trade in other wildlife products such as leopards, snow leopards, clouded leopards, ivory, musk pods, bear gall bladder, pangolin and precious timber.

**At the time of writing, EIA records suggest that since 2000, at least 6,394 Asian big cats (includes skins, live, carcasses and stuffed Asian big cats) have been recovered in trade.**<sup>1</sup> Since 2000, at least 924 kg bone, 70 skeletons, 21,063 claws and 357 teeth have been recovered in trade – which may or may not have been obtained from the 6,394 animals seized above.

**2016 has marked a significant upsurge in tiger poaching and trade** – globally 124 tigers have been recovered in trade in 2016 compared to 61 tigers in 2015, including 40 frozen tiger cubs and 30 tiger specimens preserved at a tiger “farm”. **According to information published by the Wildlife Protection Society of India (WPSI), 30 tigers were recovered in trade in India in the first five months of 2016, more than in the whole of 2015 during which period 26 tigers were recovered in trade.**<sup>2</sup>

Various NGOs have also documented the sale or availability of Asian big cat parts and products in a number of locations including in China (Chaohu, Beijing, Lhasa, Linxia, Qinghuangdao, Xining, Shigatse, Nagchu Prefecture, Songpan County, Kangding, and Litang Town); Indonesia (Medan, Pancur, Sibolga, Batam, Jambi, Bengkulu, and Bukit Barisan National Park); Mongolia (Ulaanbaatar); Myanmar (Tachilek and MongLa); and Laos (Golden Triangle Special Economic Zone, Ban Xang Hai, and Vientiane).<sup>3</sup> EIA and other NGOs have documented a total of 1,093 Asian big cat skins between 2000 and 2015.

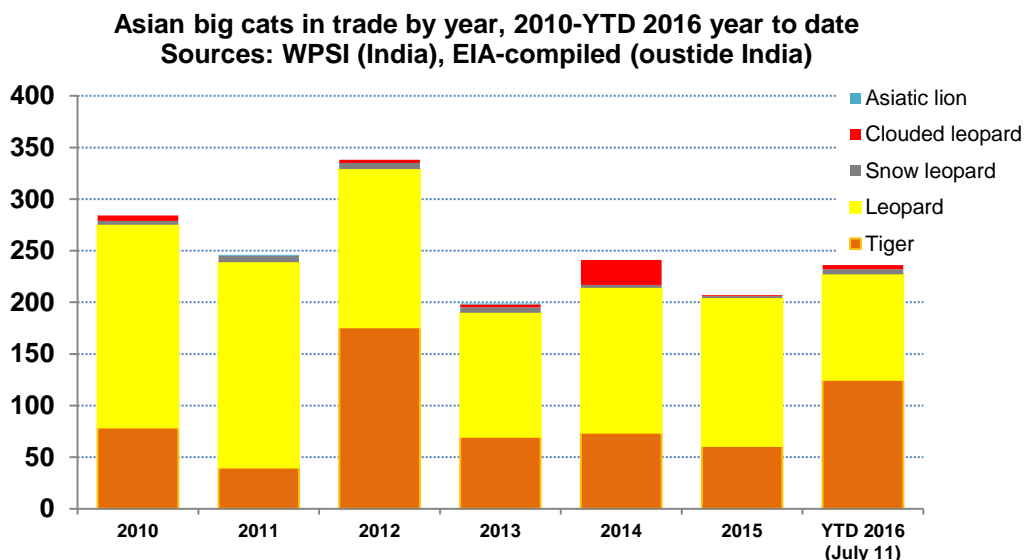
**Other Asian big cats are also threatened by trade for the same end uses, and EIA urges Parties to specifically address the growing trade in leopards.** A new study has concluded that several leopard sub-species are critically endangered noting severe declines in leopard range with some sub-species in Asia having lost as much as 98% of their historic range.<sup>4</sup> The study notes that illegal trade in leopard skins and parts, continues to be a major threat.

Graph 1 below represents the trade levels of the five species of Asian big cats – note that there appears to be significant trade in clouded leopards however reports of individual seizure incidents is not publicly available.<sup>5</sup> **Based on EIA records, leopards constitute the bulk of the Asian big cat trade representing 73% of the total number of Asian big cat specimens recovered in trade since 2000.**<sup>6</sup> There are commonalities between the tiger and leopard trade with similar end-uses and markets for products from both species - leopard skins are also widely sold for home décor and taxidermy purposes<sup>7</sup> and wine allegedly made from leopard bone is also offered for sale in China.<sup>8</sup>

Indeed, a study conducted by IUCN and TRAFFIC on Asian big cats for SC65 found that leopard seizures are comparable with those of tigers in many Asian range States and outside Asia in terms of derivative seizures, and recommended a detailed study of leopard trade to be conducted, including its impacts on the wild population in Asia.<sup>9</sup> The lack of information on the leopard trade further justifies the adoption of the fifth draft Decision in the Annex to CoP17 Doc. 60.1 regarding the review of implementation of Res. Conf. 12.5 (Rev. CoP16) and associated Decisions. EIA recommends that this review should pay special attention to the leopard, snow leopard and clouded leopard trade.

**EIA is concerned that the trade in endangered snow leopards continues and has been found to occur far afield from snow leopard range States – recent laboratory testing by scientists in Australia found that Chinese medicine purchased over the counter in Australia has been found to contain the DNA of snow leopard.**<sup>10</sup>

**Graph 1: Asian big cats trade, 2010 – YTD 2016**



Trade in specimens from facilities keeping Asian big cats

The Secretariat has reported that trafficking in Asian big cat specimens continues to be detected, and there is a need to strengthen enforcement efforts to combat it, including preventing specimens from Asian big cat captive breeding facilities from entering illegal international trade. The Secretariat has also stated that information from the review of implementation of Res. Conf. 12.5 (Rev. CoP16) as presented at SC65<sup>11</sup> and information provided by some Working Group members during the deliberations of the SC65 Working Group

on Asian big cats, indicates that “*not all Parties are implementing Decision 14.69*”, which relates to domestic as well as international trade as decided by the Conference of the Parties in 2007.<sup>12</sup>

**EIA supports the finding of the Secretariat that Parties are failing to implement Decision 14.69** which calls for restricting captive breeding operations to conservation purposes and that “*tigers should not be bred for trade in their parts and derivatives.*”

**At the time of writing, EIA records suggest that since 2010, approximately 35% of tigers seized have likely been sourced from or through facilities that legally and illegally keep captive tigers.** Based on publicly reported seizure data alone, this criteria suggests nearly 300 captive tigers have been recovered in illegal trade since 2000.

**The trade in captive tiger specimens correlates with the increase in captive tiger facilities and the increase in the number of captive tigers in such facilities in China and Southeast Asia.** In contravention of Decision 14.69, since 2010 there has been a marked increase in the keeping and breeding of tigers in Southeast Asia for purely commercial purposes; where tigers are kept and bred in conditions that do not have any conservation benefit. There are currently approximately 7,000 – 8,000 captive tigers in large tiger farms, zoos and smaller facilities that keep or breed tigers in China, Thailand, Vietnam and Laos, with the majority of such tigers in China. In Vietnam, there are 241 captive tigers in both tiger farms and zoos. According to research conducted by the Education for Nature – Vietnam (ENV), there are 179 tigers in captivity in tiger farms, 9 of which have previously been found to be involved in illegal trade.<sup>13</sup>

**Table 1: Captive tigers in China, Laos, Thailand and Vietnam**

TIGER RANGE STATE	VIETNAM	LAOS	CHINA	THAILAND
<b>Wild Tiger Population Estimate 2010<sup>14</sup></b> (government figures)	>10	17	20	189-252
<b>Wild Tiger Population Estimate 2015</b>	5 (Functionally Extinct)	2 (Functionally Extinct)	Systematic national census to be concluded	Systematic national census to be concluded
<b>Captive Tiger Population – 2010<sup>15</sup></b>	77	254	6,000	786
<b>Captive Tiger Population – 2015/2016<sup>16</sup></b>	241	~ 435	5,000 – 6,000	1,450

**In addition, a study published in 2015 found that there appears to be a growing trade in tigers and their parts and products from South Africa, and has highlighted a concern that tiger bones from South Africa may be laundered as lion bones using CITES Appendix II permits.**<sup>17</sup> The study has found that there are 280 tigers in 44 facilities in South Africa and apparently at least one is owned by a Vietnamese national with more than 50 tigers in the North West province. According to the CITES Trade Database, during 2006 – 2015, a total of 212 live tigers, 25 tiger “trophies” and 20 tigers skins were exported from South Africa.<sup>18</sup>

A comprehensive package of draft Decisions on Asian big cats has been proposed by SC66 for adoption at CoP17 through which the Standing Committee is proposing a strong process to assess the trade from and through tiger farms and other facilities that keep or breed tigers.<sup>19</sup> The Secretariat has proposed certain amendments to these draft decisions presented in the Annex to CoP17 Doc. 60.1, however the numbering of the draft Decisions should be corrected.

Decision 14.69

Regarding the scope of Decision 14.69, the Secretariat’s suggestions are confusing and contradictory – on the one hand the Secretariat acknowledges the threat posed by trade in parts and derivatives of captive bred tigers is a long-term issue, and thus suggests that Decision 14.69 be included in Res. Conf. 12.5 (Rev. CoP 16). On the other hand, however, the Secretariat is suggesting that there are unintended differences between the language of Res. Conf. 12.5 (Rev. CoP16) and Decision 14.69.

**EIA reiterates that when Decision 14.69 was adopted in 2007 Parties specifically voted against restricting the application of this Decision to international trade.** Parties that supported the adoption of

this Decision to apply to both domestic and international trade issues include tiger range states such as Bhutan, India, Indonesia, Laos and Nepal, all member states of the EU, USA and New Zealand.<sup>20</sup> Moreover, there is sufficient precedent under CITES where recommendations have been adopted in Resolutions and Decisions that address domestic trade issues where appropriate for the species concerned.<sup>21</sup>

Taken in conjunction with Res. Conf. 12.5 (Rev. CoP16) URGES para (b) (which addresses voluntary trade prohibitions but does not specify from what source) and URGES para (g) (which addresses illegal international trade in captive bred specimens), Decision 14.69 calls for an end to domestic and international trade in captive bred tiger parts, and calls for greater regulation over the keeping and breeding of tigers to eliminate the opportunities for commercial domestic and international trade in parts and derivatives from captive tigers.

**EIA recommends that Parties reject the Secretariat’s proposal that the “question of Decision 14.69” be considered under Agenda Item 32 through the review of “Implementation of the Convention relating to captive-bred and ranched specimens”.** Agenda Item 32 largely focuses on trade in wild specimens claimed to be derived from captive breeding of ranching – this was the intention of the Conference of the Parties as reflected in Decisions 16.63 – 16.66. As explained above, Decision 14.69 addresses trade in tiger specimens sourced from tiger farms and other facilities that keep or breed tigers. While there are examples of captive facilities being used as an avenue for laundering illegally-acquired, possibly *wild* specimens, the primary concern here is the continued and growing legal and illegal commercial trade in parts and derivatives of captive tigers which perpetuates and stimulates demand and undermines enforcement efforts, where the trade in captive tiger specimens raises serious concerns about the overlap in terms of individuals involved in processing and trade of body parts of both wild and captive source tigers.<sup>22</sup>

Moreover, the Standing Committee at its 66<sup>th</sup> meeting has already laid out a strong way forward for addressing the issue of implementation of Decision 14.69 and tackling trade in captive tiger specimens. **It is therefore unnecessary, and indeed contradictory to the will of the Standing Committee, as expressed in the draft Decisions adopted at SC66 and the intention of the Conference of the Parties when it adopted Decision 14.69, to refer this issue to another Working Group or review process that is focusing on a very different (and complicated) set of issues related to the use of captive trade as a front to launder wild specimens.**

EIA supports the inclusion of Decision 14.69 in Res. Conf.12.5 (Rev. CoP16) in its entirety and if there are concerns regarding the definitions of certain terms in the Decision, EIA recommends that this matter be referred to the IUCN Captive Breeding Specialist Group for clarification.

**EIA recommends that Parties:**

- a) support the adoption of the draft Decisions presented in the Annex to CoP17 Doc. 60.1, provide funding for the implementation of these Decisions, and call for their full implementation;
- b) request that the fifth draft Decision in Annex to CoP17 Doc. 60.1 regarding the review of implementation of Res. Conf. 12.5 (Rev. CoP16) and associated Decisions pay special attention to the leopard, snow leopard and clouded leopard trade;
- c) note that the Secretariat has found little progress has been made in implementing Decision 14.69 and call for implementation of this Decision;
- d) support the inclusion of Decision 14.69 in Res. Conf.12.5 (Rev. CoP16) in its entirety and if there are concerns regarding the definitions of certain terms in the Decision, refer this matter to the IUCN Captive Breeding Specialist Group for clarification; and
- e) reject the suggestion from the Secretariat that the “question of Decision 14.69” be included in the review being under Agenda Item 32 (Implementation of the Convention relating to captive-bred and ranched specimens).

## CoP17 Doc. 60.2 - PROPOSAL OF INDIA ON ASIAN BIG CATS

India, the world's largest tiger range State with more than 60% of the global tiger population, has submitted a proposal calling on Parties that have seized tiger skins or tiger carcasses to share images of these specimens with tiger range states that have photographic identification databases for tigers, and the capacity to identify tigers from photographs of tiger skins. **This method of identification of tigers can be used to support law enforcement efforts as it enables authorities to identify the locations the tiger was known to have frequented and in turn can facilitate prosecutions as well as provide valuable information on poaching and possible trade routes.**

The Standing Committee at its 65<sup>th</sup> and 66<sup>th</sup> meetings has previously adopted recommendations calling on Parties to share images of tiger specimens for identification of origin.<sup>23</sup> EIA believes that the draft Decisions proposed by India will strengthen enforcement efforts to tackle illegal tiger trade.

**Further the images requested do not constitute sensitive or confidential material and can therefore be shared with the relevant authorities. Indeed a similar recommendation has been adopted regarding large-scale ivory seizures**, where at CoP16 Decision 16.83 was adopted to urge all Parties to share samples of all large-scale ivory seizures with relevant forensic and other research institutions in support of enforcement and prosecutions.<sup>24</sup> Further Decision 16.83 also directs all Parties involved in large scale ivory seizures to collect, if possible, samples from all large seizures from the past 24 months for the purpose of determining the origin of the seized ivory. Thus there is sufficient precedent under CITES to request Parties to share information on seized specimens for both future as well as past seizures. India's proposal requests Parties to share images of tiger skins seized since 2006 (where such images are available or can be acquired).

EIA commends India and Nepal for using this method of sharing images of seized specimens for enforcement purposes – from the beginning of 2016 till April, ten skins from three different seizures in India and Nepal were compared and five were matched to tiger images in the database.<sup>25</sup>

**EIA recommends that Parties support the adoption of the draft Decisions proposed by India encouraging Parties to share images of seized tiger skins and carcasses.**

- 
- <sup>1</sup> Figures from WPSI [www.wpsi-india.org](http://www.wpsi-india.org) for India, EIA-compiled outside India.
- <sup>2</sup> WPSI, <http://www.wpsi-india.org/wpsi/index.php> (accessed June 16, 2016).
- <sup>3</sup> EIA, *Mapping the Crimes: Illegal trade seizures: Tigers & Asian Big Cats*, <https://eia-international.org/illegal-trade-seizures-tigers-asian-big-cats>.
- <sup>4</sup> Jacobson et al. (2016), *Leopard (Panthera pardus) status, distribution, and the research efforts across its range*, PeerJ 4:e1974; DOI 10.7717/peerj.1974.
- <sup>5</sup> D’Cruze, N. & Macdonald, D.W. (2015), *Clouded in mystery: the global trade in clouded leopards*, Biodivers Conserv (2015) 24: 3505. doi:10.1007/s10531-015-1010-9.
- <sup>6</sup> Figures from WPSI [www.wpsi-india.org](http://www.wpsi-india.org) for India, EIA-compiled outside India.
- <sup>7</sup> Kunming Customs seized smuggled leopard skin (describing a seizure of a leopard skin in May 2015 by Tengchong Customs in Yunnan Province, [http://yndaily.yunnan.cn/html/2015-05/30/content\\_969354.htm?div=-1](http://yndaily.yunnan.cn/html/2015-05/30/content_969354.htm?div=-1) (last visited July 12, 2016); News article on man selling wildlife products (describing a seizure by police in Jinan of a variety of wildlife items including two snow leopard skins, a clouded leopard skin and a leopard skin and bones, lion teeth, and ivory) <http://news.iqilu.com/shandong/shandonggedi/20130628/1579862.shtml> (last visited July 12, 2016).
- <sup>8</sup> Website of the Yunnan Forest Police (describing seizure of 22.4kg of leopard bone and 18,660 bottles of leopard bone wine in June 2012), <http://www.ynsj.gov.cn/aboutus/event?page=8> (last visited July 12, 2016); Beijing Tongrentang. 壮骨药酒 [Bone-strengthening medicinal wine], <http://www.tongrentang.com/tongrentang/346122/346126/362043/362120/index.html> (last visited July 12, 2016).
- <sup>9</sup> SC65 Doc. 38, Annex 1 – p. 7.
- <sup>10</sup> Roger Byard (2016), *Traditional medicines and species extinction: another side to forensic wildlife investigation*, Forensic Sci Med Pathol. 2016; 12, 125-127.
- <sup>11</sup> SC65 Doc. 38, Annex 1.
- <sup>12</sup> CoP17 Doc. 60.1, ¶ 23.
- <sup>13</sup> ENV, *Allowing criminal to keep tigers for “preservation purposes”: A bad joke?*, <http://envietnam.org/index.php/topic/env-activities/763-allowing-criminal-to-keep-tigers-for-preservation-purposes-a-bad-joke>
- <sup>14</sup> Goodrich, J., et al. (2015), *Panthera tigris*. The IUCN Red List of Threatened Species 2015.
- <sup>15</sup> SSN & ENV (2014), *Caged Assets: Tiger Farming and Trade*, <https://eia-international.org/wp-content/uploads/Caged-Assets-revised.pdf>.
- <sup>16</sup> EIA compiled data available at [https://eia-uk.cartodb.com/viz/a9eb8112-351a-11e5-8ac5-0e6e1df11cbf/public\\_map](https://eia-uk.cartodb.com/viz/a9eb8112-351a-11e5-8ac5-0e6e1df11cbf/public_map); Information provided by Education for Nature-Vietnam (ENV); Presentation of Thailand to 3rd Asia Ministerial Conference on Tiger Conservation, New Delhi (April 2016); Karl Ammann (Apr. 2014), *Inside Tiger Farming: A Long Chain of Profiteers*; EIA (2015), *Sin City: Illegal wildlife trade in Laos’ Golden Triangle Special Economic Zone*, <https://eia-international.org/wp-content/uploads/EIA-Sin-City-FINAL-med-res.pdf>; CITES Management Authority of China (2014) SC65 Doc 38 Annex 3; China CITES Management Authority (2010), *Tigers Conservation in China* (brochure distributed by China’s CITES Management Authority at CITES CoP15).
- <sup>17</sup> WildCru, Oxford University & TRAFFIC (2015), *Bones of Contention: An Assessment of the South African Trade in African Lion Bones and Other Body Parts*.
- <sup>18</sup> CITES Trade Database (accessed June 24, 2016).
- <sup>19</sup> CITES SC66 Com. 11.
- <sup>20</sup> Voting record available at CoP14 Com. II Rep. 14 (Rev. 1), (Vote 2).
- <sup>21</sup> See, e.g., Res. Conf. 6.10, *Trade in rhinoceros products*; Res. Conf. 11.8 (Rev. CoP13), *Conservation of and control of trade in the Tibetan antelope*; Res. Conf. 10.10 (Rev. CoP16), *Trade in elephant specimens*.
- <sup>22</sup> SSN & ENV (2014), *Caged Assets: Tiger Farming and Trade*.
- <sup>23</sup> CITES SC65 Com. 4; CITES SC66 Com. 11.
- <sup>24</sup> CITES Decision 16.83.
- <sup>25</sup> CoP17 Doc. 60.2, ¶ 7.