

**The Honorable Sally Jewell**  
Secretary of the Department of the Interior  
1849 C Street, N.W.  
Washington DC 20240

July 2, 2014



**Sub: Review of existing Pelly certification against China for trade in tiger parts and products**

Dear Secretary Jewell,

On behalf of the Environmental Investigation Agency (EIA), please find enclosed information for your consideration in your ongoing periodic review of the existing certification of the People's Republic of China under the Pelly Amendment to the Fisherman's Protective Act of 1967, 22 U.S.C. § 1978, related to trade in tiger parts and products.

EIA is an international non-governmental organization committed to combating environmental crime and advocating for effective criminal justice responses to tackle such crime. In relation to tiger conservation, EIA has extensive experience in investigating and exposing the trade in tiger parts and products and has played a key role in influencing decision-making under the UN Convention on International Trade in Endangered Species (CITES) by providing concrete evidence from investigations on the tiger trade and recommendations to combat such trade.

China was certified by then Secretary of the Interior Bruce Babbitt on September 6, 1993 on the ground that China was engaged in trade of rhinoceros and tiger parts that diminished the effectiveness of an international conservation program for these endangered species. After the making of a certification, the Pelly Amendment requires the Secretary of Interior to "*periodically review the activities of the nationals of the offending country to determine if the reasons for which the certification was made no longer prevail.*" 22 U.S.C. § 1978(d).

The enclosed briefing provides information that confirms that the reasons for the certification of China under the Pelly Amendment continue to prevail and that China continues to diminish the effectiveness of CITES and other global tiger conservation agreements. Significantly, the information enclosed contains evidence that contrary to CITES requirements China allows a legal trade in tiger skins sourced from captive-bred tigers. EIA has documented the commercial sale of tiger skin rugs made from skins sourced from captive-bred tigers with the express authorisation of China's State Forestry Administration.

EIA requests that the information enclosed be taken into consideration as part of the ongoing periodic review of the existing certification of China for trade in tiger parts and products and that a determination be made that the reasons for certification of China continue to prevail. Further EIA requests that the Department of the Interior call for urgent measures to be adopted by China to comply with relevant CITES resolutions and decisions as well as global tiger conservation agreements.

Thank you for your consideration. If you have any questions, please do not hesitate to contact us.



---

Debbie Banks  
Head of Tiger Campaign  
Environmental Investigation Agency

Enclosed a/a: EIA Briefing for Review of Existing Pelly Certification of China with attachments

Cc:  
Daniel M. Ashe  
Director  
U.S. Fish & Wildlife Service  
1849 C. Street, NW, ROOM 3331  
Washington, DC 20240

Roddy Gabel  
U. S Fish and Wildlife Service, International Affairs  
Chief of the Management Authority  
Suite 212  
4401 N. Fairfax Drive  
Arlington VA 22203



**Environmental Investigation Agency (UK)**  
62-63 Upper Street  
London, N1 0NY  
T: +44 (0)207 3547960  
E: [debbiebanks@eia-international.org](mailto:debbiebanks@eia-international.org)  
<http://www.eia-international.org/>

**Environmental Investigation Agency (US)**  
PO Box 53343  
Washington, DC 20009  
T: +1 202 4836621  
E: [info@eia-global.org](mailto:info@eia-global.org)  
<http://www.eia-global.org/>