



Vietnam's Illegal Rhino Horn Trade:

Undermining the Effectiveness of CITES





INTRODUCTION

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Environmental Investigation Agency

PO BOX 53343, Washington DC 20009
T +1 202 483 6621
F +1 202 986 8626
E info@eia-global.org

62-63 Upper Street, London N1 0NY, UK
T +44(0)20 7354 7960
F +44(0)20 7354 7961
E ukinfo@eia-international.org



www.eia-global.org

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Vietnam is believed to be driving the “rapacious illegal trade in rhino horn.”
—Milliken, TRAFFIC

The Environmental Investigation Agency (EIA), along with the Animal Welfare Institute (AWI) and International Fund for Animal Welfare (IFAW), filed a petition on December 21, 2012 with the U.S. Secretary of the Department of the Interior under the Pelly Amendment, which enables the U.S. President to impose trade sanctions against countries engaged in trade that diminishes the effectiveness of any international program in force with respect to the United States for the conservation of endangered or threatened species. This briefing summarizes the key points from the Petition to certify Vietnam as diminishing the effectiveness of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) for trade in rhino products.

Rhinoceros populations have been decimated in both Africa and Asia, with three subspecies already extinct and most species and subspecies now critically endangered. To curb the international trade in rhino horn and other parts and derivatives that has led to diminished rhino populations, the CITES Parties have placed all but two populations of rhinos in Appendix

I to prohibit international trade for commercial purposes.¹ Populations of the southern white rhino (*Ceratotherium simum simum*) in South Africa and Swaziland are included in Appendix II with an annotation limiting trade to hunting trophies and live rhinos to appropriate and acceptable destinations. These efforts helped stabilize and in some cases, increase, rhino populations.

However, despite these efforts, rhino populations are again under threat, largely due to rising demand in Vietnam and the failure of Vietnam to implement its CITES obligations. Vietnam is currently the largest market for rhino horn from both legally hunted rhinos in South Africa, whose horns are then illegally traded, and poached rhinos in South Africa and elsewhere. In some cases, Vietnam has refused to implement the recommendations of the CITES Parties or even respond to requests for information from the Parties. In fact, Vietnamese CITES officials continue to deny the role of Vietnam and its nationals in the illegal rhino horn trade,² statements that defy all evidence to the contrary. With Vietnamese nationals at the center of the illegal trade, Vietnam is believed to be driving the “rapacious illegal trade in rhino horn.”³

Significant quantities of rhino horn are found in Vietnamese markets, yet Vietnam does little to confiscate rhino horn in its domestic markets or rhino horn being imported into Vietnam illegally. Despite the numerous reports of Vietnamese nationals' involvement in the illegal trade, and arrests and prosecutions of Vietnamese nationals in the United States,⁴ South Africa, and elsewhere, until very recently Vietnam itself had reportedly not seized a single illegally imported rhino horn or prosecuted a single individual for illegal trade since 2008. The Vietnamese government has clearly turned a blind eye to its own involvement and is not fully enforcing its own legislation prohibiting rhino trade, taking a complacent stance on the issue. Vietnam's continued flouting of its international responsibilities is devastating rhino conservation efforts everywhere but particularly in South Africa, where 1,449 rhinos were poached in the last three years.⁵ Vietnam is essentially using loopholes for sport hunting to develop a domestic market in

rhino horn and drive up poaching to supply the market. The involvement of Vietnamese nationals in the illegal trade is so blatant that South Africa has adopted new rules that prohibit the issuance of rhino hunting permits to Vietnamese nationals.

Vietnam's inability or unwillingness to control this illegal trade undermines the significant rhino conservation gains made in South Africa and elsewhere. In addition, Vietnam has failed to take actions to reduce public demand for a product known to have no therapeutic value for treating cancer or curing hangovers, two of the principal reasons for increased demand for rhino horn in Vietnam. Vietnam's actions and inactions clearly convey to the public that rhino horn trade and consumption is permissible, and ultimately undermine CITES and threaten the future of the rhino.

Recently, South Africa and Vietnam signed a *Memorandum of Understanding on Cooperation in Biodiversity Conservation and*

Protection. Vietnam has also announced plans to implement a new prohibition against the export, import, selling or buying of rhino specimen imports, but with several glaring exceptions. While this new directive is stronger than previous legislation, there are still loopholes that allow the import of rhino parts and derivatives. Although there are new developments in Vietnam's rhino horn trade legislation, Vietnam has demonstrated an inability or unwillingness to enforce previous legislation, and the new initiative is meaningless without proper enforcement. Vietnam needs to clearly acknowledge its role in the rhino horn trade and accept responsibility by appropriately following through and enforcing strict legislation, in addition to building a strong campaign to end demand. Implementing and enforcing a domestic ban on all trade in rhino horn in Vietnam is the only way to curb the demand and supply and stop rhino populations from further declining.



Precarious Conservation Status

During the past several hundred years, many rhino subspecies or populations have had their numbers decimated to the point of near extinction. Three rhinoceros subspecies have actually become extinct since the beginning of the twentieth century. Of the five remaining species of African and Asian rhino, three are classified as Critically Endangered, one as Near Threatened and one as Vulnerable. All species of rhino are listed in CITES Appendix I, except for the southern white rhino (*Ceratotherium simum simum*) in South Africa and Swaziland, which are listed in CITES Appendix II.⁶ CITES Parties have also agreed to take a number of other steps to

Rhino horn trade is “one of the most structured criminal activities currently faced by CITES.”

—CITES Secretariat

conserve rhinos, such as restricting domestic trade, verifying rhino stocks, and undertaking campaigns to reduce demand for rhino horn.⁷

These actions, coupled with other conservation efforts, helped to stabilize or, in the case of South Africa, dramatically increase rhino populations. The southern white rhino is the most abundant of all living rhino species.⁸ The total global population of southern white rhinos is approximately 20,160 individuals,⁹ with South Africa’s “Near Threatened” population comprising 93.2% of

the total white rhino population.¹⁰ Despite efforts by South Africa and other range States to protect rhinos, a recent, dramatic surge in poaching is significantly affecting rhinos in Africa and Asia and threatening to reverse efforts to conserve and rebuild rhino populations.¹¹

Threats to Rhinos – Poaching Fueled by Demand in Vietnam

Poaching presents the greatest threat to rhino populations worldwide as international demand for rhino horn continues to increase.¹² Organized crime syndicates are engaged in poaching and smuggling activities in both range and consumer countries, and the CITES Secretariat believes that rhino horn trade “is one of

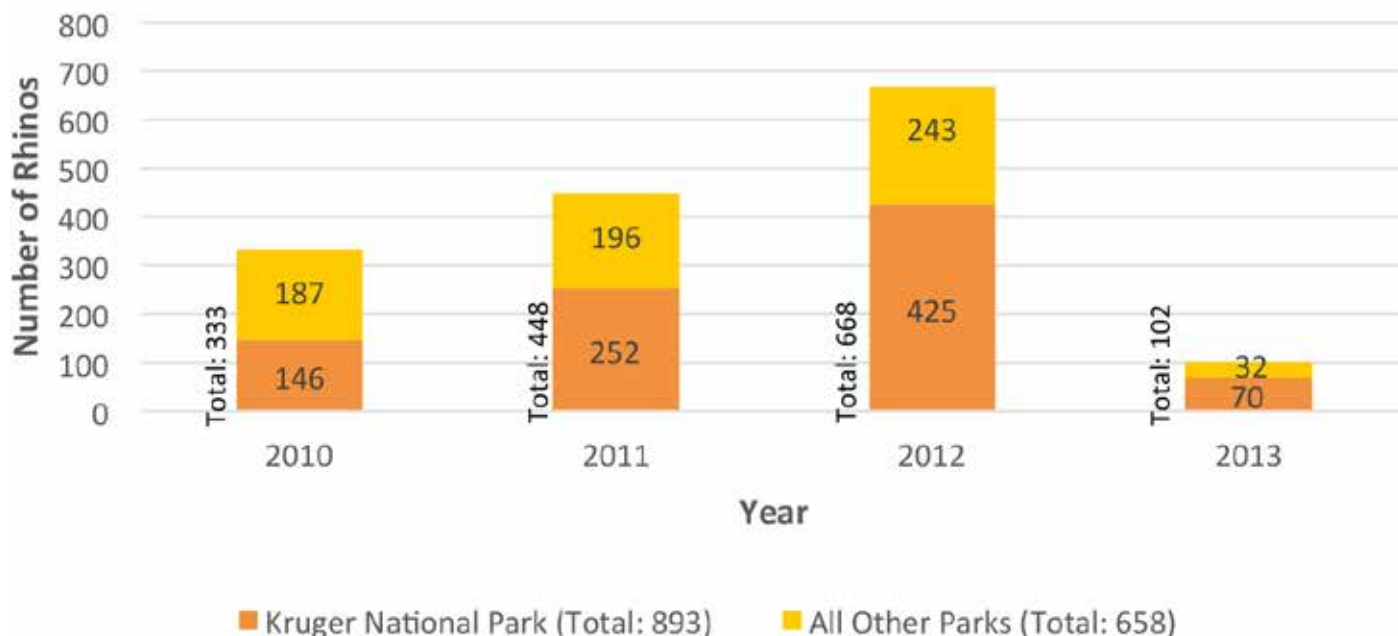


the most structured criminal activities currently faced by CITES.”¹³ Demand for rhino horn has surged, and the number of rhinos poached each year has risen dramatically over the past few years,¹⁴ particularly in South Africa, as demonstrated in the graph.¹⁵

The poaching crisis is being fueled by increased demand for rhino horn in Vietnam.¹⁶ Rhino horn has historically been used for traditional medicine throughout Eastern Asia; Vietnam has most commonly used rhino horn powder as a treatment for fevers or convulsions.¹⁷ There has been a recent emergence in the use of rhino horn as a treatment for cancer and other life-threatening diseases.¹⁸ Though the horn’s purported efficacy as a cure for cancer has been publicly debunked by several traditional medicine authorities,¹⁹ the myth that rhino horn can both prevent and cure cancer has prompted a significant increase in Vietnamese demand for illegal horn imports.²⁰ Shockingly, despite no clinical evidence supporting rhino horn’s pharmacological value as a cancer treatment,²¹ the director of the National Hospital of Traditional Medicine, which is part of Vietnam’s



Rhinos poached in South Africa



Source: Department of Environmental Affairs, South Africa. February 20, 2013

Ministry of Health, even claimed that the horn can block the growth of cancer cells.²² Additionally, affluent Vietnamese have also recently started to consume rhino horn recreationally,²³ most commonly as a purported cure for hangovers,²⁴ and an emerging group of male consumers also believe that the horn can enhance sexual performance.²⁵

Rhino horn has also been embraced as a luxury item or status symbol among some rich Vietnamese.²⁶ This demand is largely influenced by the rarity of rhino horns and appears driven by rising affluence in Southeast Asia.²⁷ Indeed, it has been suggested that some individuals might be stockpiling horns and “banking on extinction” to drive up the value of their rhino horn stockpile.²⁸ Vietnam is projected to be one of the fastest growing economies by 2025;²⁹ if action is not taken to prevent illegal imports and enforce existing trade bans, it is likely that rhino poaching will continue to increase.

CITES and Rhinos

In 1977, the CITES Parties included all rhino subspecies in Appendix I—the designation for species “threatened with extinction which are or may be affected by trade.”³⁰ CITES prohibits the importation of Appendix I species and specimens for primarily commercial purposes and requires import and export permits for all permissible trade in Appendix I species.³¹ The Parties downlisted the southern white rhino population of South Africa to Appendix II in 1994³² and the southern white rhino population of Swaziland in 2004.³³ Appendix II species are not currently threatened by extinction, but may become threatened if trade is not strictly regulated.³⁴ All Parties must “take appropriate measures” to prohibit trade that violates the provisions of the Convention.³⁵

Rhino populations continued to decline, however, and the Parties acknowledged that drastic measures were necessary to protect the

continued existence of the species. As a result, the Parties called for a complete prohibition on all sales and trade in rhino products, with the exception of solely non-commercial exports of legitimate hunting trophies.³⁶ Despite these efforts taken under CITES, the world rhino population decreased by more than 90% by 1994.³⁷ Concerned about the continued survival of rhino species, the Parties adopted Resolution Conf. 9.14 regarding the Conservation of Rhinoceroses in Asia and Africa.³⁸

The Parties have revised Resolution 9.14 several times, most recently in 2010 at CoP15. Resolution Conf. 9.14 (Rev. CoP15) now “urges” the following actions:

1. all Parties that have stocks of rhinoceros horn to identify, mark, register and secure stocks;
2. all Parties to adopt and implement comprehensive legislation and enforcement controls, including internal trade restrictions and penalties, aimed

at reducing illegal trade in rhinoceros parts and derivatives;

3. range States to be vigilant in their law enforcement efforts, including the prevention of illegal hunting, the early detection of potential offenders and the application of appropriate penalties to act as effective deterrents;
4. that law enforcement cooperation among range and implicated States be increased through existing international, regional and national law enforcement mechanisms and, where necessary, through the creation of such mechanisms in order to curtail illegal trade in rhinoceros horn; and
5. the implicated States, as a matter of priority, to work with all user groups and industries to develop and implement strategies for reducing the use and consumption of rhino parts and derivatives and to report on progress for inclusion into the joint IUCN/TRAFFIC reports.³⁹

Vietnamese Nationals—Fueling Demand and Engaged in Illegal Trade

Vietnamese nationals are fueling demand for rhino horn and are implicated in poaching, illegal trade and sustaining demand through a domestic market. In the past ten years, Vietnam has grown from an “overlooked” market for rhino horn into the world’s largest importer of legal and illegal rhino horn from South Africa.⁴⁰ Reports indicate that the increase in demand, scarcity and price of rhino horn has induced Vietnamese nationals to enter the rhino horn market,⁴¹ and led to a dramatic rise in the poaching of rhinos and the illegal trade in rhino horn. Research indicates that Vietnam is not adequately enforcing its CITES obligations to monitor imports of rhino horn and to prosecute importers and possessors of illegal rhino horn.

Vietnamese Diplomats Implicated

Vietnamese diplomatic officials in South Africa have been implicated in the illegal rhino horn trade. In one remarkable instance, a Vietnamese embassy employee in South Africa was caught on tape conducting a rhino horn trade in front of the Vietnamese embassy in Pretoria, South Africa. Vietnamese government officials also have served as “conduits” for rhino horns between Africa and Vietnam. Thus, allowing exceptions to the ban on rhino horn trade for diplomatic purposes, one of the exceptions in Vietnam’s new directive, perpetuates an already known route for the illegal trade.

Pseudo-Hunting

Between July 2009 to May 2012, 185 Vietnamese nationals engaged in rhino hunts in South Africa, which represented 48% of the total hunts during that period. These Vietnamese nationals are referred to as “pseudo-hunters,” because they appear to have no interest or background in sport hunting, and are recruited to secure rhino horns for commercial sale in Vietnam. Notably, many of the Vietnamese nationals engaging in trophy hunts are believed to work for crime syndicates.

South Africa stopped issuing permits to Vietnamese nationals, in part to prevent pseudo-hunting, but they have now found a rise in hunting permit applications from other countries not historically associated with rhino trophy hunting. Vietnamese organized crime syndicates are engaging “hunters,” most notably from the Czech Republic, to circumvent South Africa’s ban on hunting permits for Vietnamese nationals and to export trophies to their countries, where they are then laundered into the illegal trade. This new trend is a compelling illustration of poachers’ sophistication and the depth of the problem surrounding legal and illegal rhino trade.

The illicit commercial trade in rhino horn appears to be supplemented, at least in part, by legal imports of rhino horn hunting trophies into Vietnam.⁴² As TRAFFIC has reported, “beyond sport hunting, illegal trade networks supplying Viet Nam have also acquired hundreds of rhino horns from other illegal sources in South Africa, including poaching, theft and unregistered stocks held in the private sector.”⁴³

Vietnam’s recent emergence as a major new market for rhino horn diminishes the effectiveness of CITES by encouraging international trade in the species.

Vietnam – Failing to Reduce Demand and Consumption

Vietnam has failed to work with user groups to develop effective strategies to reduce demand for rhino parts, has failed to enact and implement

programs to reduce availability and consumption of rhino parts, and has failed to report on the progress of any of these efforts to the Standing Committee. Vietnam is failing to:

- Adequately reduce demand for rhino parts and derivatives. Vietnam has done little to dispel rhino horn's medical treatment myths of curing cancer, fevers or hangovers.⁴⁴ Additionally, no evidence indicates that it has made an organized effort to reduce demand through public education or promotion of alternatives to rhino horn consumption.⁴⁵
- Adequately reduce the availability and consumption of rhino parts and derivatives. Rhino horn consumption in Vietnam is influenced in part by the availability of illegal horn imports. Undercover "buyers" have had no difficulties procuring rhino horn in Vietnam.⁴⁶ Though Vietnam claims that sales of rhino horn are illegal in Vietnam,⁴⁷ many of these outlets openly advertise horn sales,⁴⁸ and sales of fake horns and rhino horn paraphernalia are common.⁴⁹ These illicit sales appear to be largely unregulated in Vietnam, and there is evidence that government officials may be complicit or, in some cases, directly involved in the illegal horn trade.⁵⁰
- Adequately report on its progress in reducing demand for and consumption of rhino parts and derivatives. Vietnam persists in denying its status as one of the world's largest rhino horn markets,⁵¹ and refuses to publicly acknowledge the scope of Vietnamese demand for rhino horn and other rhino products.⁵²

Vietnam's failure to make significant commitments to reduce demand and consumption of rhino parts and derivatives and adequately report on its progress in implementing Resolution Conf.

9.14 (Rev. CoP15) diminishes the effectiveness of CITES and is indicative of a national reluctance to curb demand and suppress the illegal trade flowing across its borders.

Vietnam – Failing to Enforce CITES Implementing Legislation

Although the CITES Secretariat believes that Vietnam's national legislation generally conforms with CITES implementation requirements,⁵³ Vietnam has failed to adequately implement and enforce these laws.⁵⁴ This failure has resulted in the dramatic increase in illegal importation and domestic trade of rhino horn that has been essentially unchallenged by Vietnamese enforcement officials since 2008.⁵⁵ Additionally, the Vietnamese government has done little to ensure

that Vietnam complies with its CITES obligations and otherwise assist the international communities' efforts to conserve rhinos. While Vietnam may have passed legislation relating to enforcement, Vietnam has clearly been failing to take effective on-the-ground action to enforce provisions.

Vietnam claims that a lack of seizures is evidence that illegal trade in rhino horn is decreasing.⁵⁶ In making this claim, Vietnam is willfully ignoring reports and trade data indicating that a significant number of rhino horns are illegally imported into Vietnam. For example, between 2003 and 2010, 657 rhino horns were legally exported as hunting trophies from South Africa to Vietnam.⁵⁷ However, during the same period only 170 rhino horns were legally imported into Vietnam from South Africa,⁵⁸ leaving 487 rhino horns unaccounted for. The discrepancy indicates that traffickers imported these rhino horns into



Vietnam illegally and that Vietnam is violating CITES by failing to enforce its implementing legislation and prosecute individuals involved in the illegal rhino horn trade. Additionally, arrests and prosecution of Vietnamese citizens by other States for their involvement in the illegal rhino horn trade also prove Vietnamese citizens' involvement.⁵⁹



Undercover camera showing sale of rhino horn in Hanoi 2011

Clearly, Vietnam's failure to enforce its CITES implementing legislation and prosecute individuals involved in the illegal rhino horn trade is diminishing the effectiveness of CITES.

Vietnam – Failing to Implement CITES Obligations

Vietnam is failing to verify permits and monitor and control trade in rhino hunting trophies from South Africa. In accordance with CITES, Vietnam must require valid South African export permits for all rhino hunting trophies imported into Vietnam,⁶⁰ and according to TRAFFIC, Vietnam claims to have additional requirements for rhino hunting trophy imports from South Africa.⁶¹ It appears, however, that Vietnam is failing to adequately implement or enforce these requirements, based on the difference between South Africa's export records and Vietnam's import records.⁶² Moreover, reports indicate government complicity in relation to these undeclared imports.⁶³ CITES mandates that Vietnam maintain records of trade in specimens of all CITES-listed species—including hunting trophies—imported into the country that includes the name and address of the importer.⁶⁴ Available data, however, shows that Vietnam has yet to implement an effective system to register and track imported hunting trophies.

Additionally, Vietnam has not yet reported any arrests or prosecutions of importers who cannot account for their trophies, and there is little evidence to indicate that Vietnam has established an effective regulatory system to prevent legal hunting trophies from entering the illegal market.⁶⁵ Vietnam is failing to adequately implement and enforce both national and international law regulating the importation of rhino hunting trophies from South Africa.⁶⁶ In response to growing concern

over the questionable legality of Vietnamese rhino hunts, South Africa has suspended the issuance of hunting permits to Vietnamese nationals.⁶⁷ *Vietnam's failure to adopt and implement an effective regulatory system to monitor legal hunting trophy imports and prevent trophy horns from entering into illegal commercial trade clearly undermines international efforts to protect rhinos and diminishes the effectiveness of CITES.*

Vietnam is failing to identify, mark, register and secure rhino stocks.⁶⁸ Resolution Conf. 9.14 (Rev. CoP15) urges all Parties that have stocks of rhinoceros horn to identify, mark, register, and secure rhino stocks.⁶⁹ Evidence indicates that Vietnam has stocks of rhino horn,⁷⁰ and Vietnam has also been asked to provide information on the status of its stock check of rhino hunting trophies. Reports indicate that at least some rhino horns legally imported into Vietnam as hunting trophies are later sold in the domestic market, which is helping fuel the rhino horn trade and undermining the effectiveness of CITES.⁷¹ South Africa will continue to bar the issuance of hunting permits to Vietnamese citizens until Vietnam confirms whether the rhino horn trophies exported are still in the hunters' possession.⁷² Effective rhino horn stock management helps prevent the leakage of rhino horn stocks into illegal trade.⁷³

Vietnam's failure to adequately manage its rhino horn stocks and provide a stock check of rhino hunting trophies indicates that Vietnam is not taking appropriate measures to reduce the illegal trade in rhino horn, and is diminishing the effectiveness of CITES.



in illegal trade of rhino horn is inconsistent with Resolution Conf. 9.14 (Rev. CoP15) and is diminishing the effectiveness of CITES.

Recent Developments

The Secretariat noted that while South Africa and Vietnam have taken steps to exchange information regarding horn exports and smuggling, the demand for rhino horn has continued to increase in Vietnam.⁷⁸ There is little indication that Vietnam has made any significant progress in implementing Resolution Conf. 9.14 (Rev. CoP15) or in stemming the influx of illegal trade. The IUCN Species Survival Commission (IUCN/SSC) African and Asian Rhino Specialist Groups and TRAFFIC specifically note in their report to the CITES Secretariat that the situation in Vietnam is urgent and should remain a high priority for CITES oversight attention. Tackling the rhino horn trade in Vietnam will require strong political will, a strong legal framework to ensure rhino horn trophies are not entering the commercial market, strengthened legislation regarding the sale of rhino horn, and improved law enforcement.⁷⁹

On December 10, 2012, the governments of Vietnam and South Africa signed a Memorandum of Understanding on Cooperation in Biodiversity Conservation and Protection (MoU), with the objective of promoting “cooperation between the Parties in the field of biodiversity management, conservation and protection, law enforcement, compliance with CITES, and other relevant legislation and Conventions on the basis of equality and mutual benefit.”⁸⁰ No species are mentioned specifically in the text and it is concerning that Vietnam is not more willing to openly acknowledge its role in the rhino horn trade; however, the MoU serves as a potential

Vietnam is failing to adopt and implement comprehensive legislation and enforcement controls, including internal trade restrictions and penalties aimed at reducing illegal trade in rhino parts and derivatives.

Vietnamese legislation and enforcement has been ambiguous, with serious implications for rhino

horn trade and demand in Vietnam. Vietnam claims trade in rhino horn from all species is illegal,⁷⁶ but the open sale of rhino horn with no seizures or prosecutions underscores how Vietnam is undermining CITES. Additionally, Vietnam’s failure to enact and implement legislation that clearly prohibits hunters from selling their rhino hunting trophies into commercial trade is contrary to the spirit of CITES and diminishes the effectiveness of the Convention. Vietnam has documentation procedures for importers of rhino hunting trophies, however, there is no evidence that Vietnamese officials are implementing the procedures or enforcing that prohibition. Even so, these procedures will only be effective for individuals who attempt to import rhino horn legally by presenting the required documentation to the authorities and will have no impact on importers who smuggle rhino horn. Additionally, the penalties imposed by Vietnamese law are not strict enough to deter persons from engaging in illegal wildlife trade and poaching. The value of rhino horn may significantly outweigh the fines that a person or entity might receive for engaging in the illegal wildlife trade.⁷⁷

Vietnam’s failure to adopt and implement legislation to control the internal trade in rhino horn and deter persons from engaging

Vietnam Failed to Save its Javan Rhino

The death of the last remaining Javan rhino from Vietnam in 2010 plainly suggests that Vietnamese law enforcement was not vigilant in its efforts to prevent illegal hunting and protect the Javan rhino.⁷⁴ Even after receiving support and training courses on patrolling techniques, the staff and rangers failed to maintain adequate patrols.⁷⁵ Insufficient patrols likely made it easier for poachers to enter Cat Tien National Park and kill the last remaining Javan rhino in Vietnam.

The failure to follow protocols, to the detriment of the last few individual Javan rhinos in Vietnam, even when the resources were provided, is another way in which nationals of Vietnam have diminished the effectiveness of CITES.

platform to move forward if there is continued collaboration and actual provision development coupled with enforcement.

Following the recent MoU, a new Vietnamese government decision prohibiting the export, import, selling or buying of white and black rhino derivatives, becomes effective on March 15, 2013, but there are many loopholes. Rhino derivatives can be imported if they: 1) serve the purposes of diplomacy, scientific research, biodiversity conservation, display at zoos, exhibition, non-profit circus performances, law enforcement or exchange among CITES Management Authorities; 2) are non-commercial products that meet CITES authority requirements; or if 3) specimens already have CITES import permits before the Decision takes effect.⁸¹ With its previous legislation, Vietnam demonstrated an inability

or unwillingness to control the rhino horn trade – this new initiative is meaningless without proper enforcement. Those that violate the prohibition are to be criminally charged in accordance with existing legislation, the penalties of which are not strict enough to deter illegal trade.

Conclusions

Although the recently announced prohibition may be a step in developing comprehensive legislation against rhino horn trade, it is not enough. Vietnam has had legislation to prevent the trade in rhino horn, and regulations on hunting trophy imports and exports, that were unenforced and ignored. Vietnam must openly acknowledge its role in driving the demand in rhino horn and truly implement and enforce a complete ban, with no loopholes, on domestic trade in rhino horn

that is properly enforced with strict internal management and appropriate penalties. In addition, the Vietnamese government must work to collaborate and develop campaigns geared towards ending the demand for rhino horn.

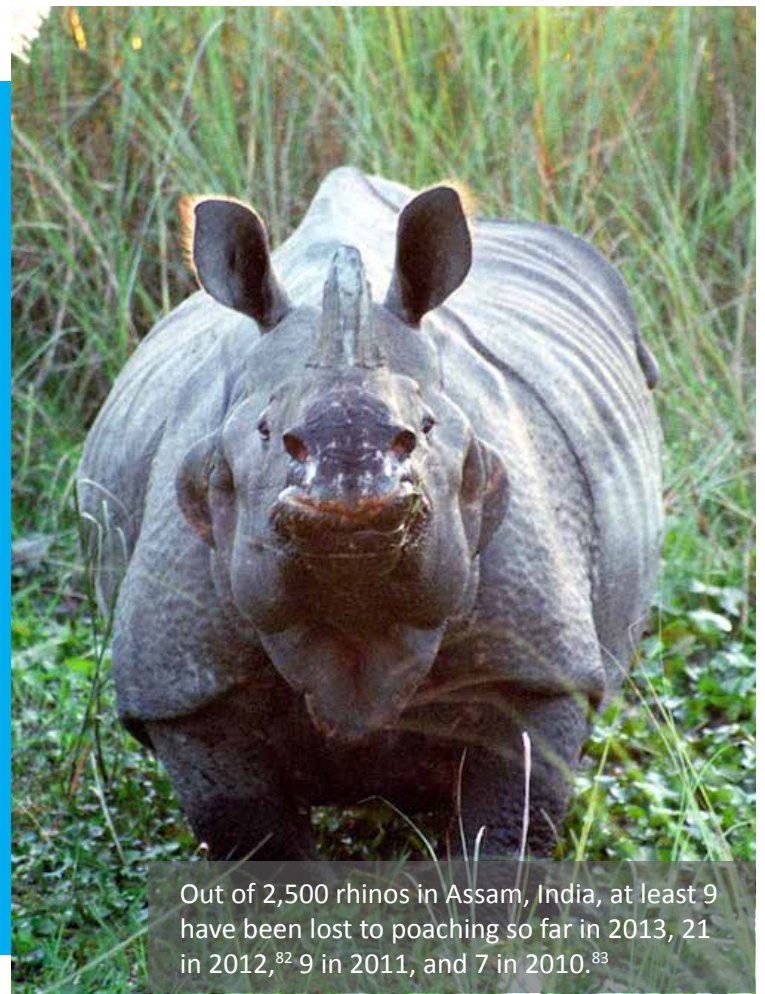
Vietnam has failed to control trade, reduce demand for rhino horn, and improve implementation of CITES. Vietnam must be held accountable for its role in driving demand for rhino horn and lack of action to comply with CITES requirements. The Petition under the Pelly Amendment to certify Vietnam as diminishing the effectiveness of CITES, if certified, would enable the U.S. to impose trade sanctions against Vietnam in CITES-listed wildlife, taking a definitive stance in support of rhino conservation.

Recommendations

The U.S. Secretary of Interior should certify Vietnam under the Pelly Amendment as diminishing the effectiveness of CITES.

Vietnam should implement and enforce a complete domestic ban on all rhino trade including live animals.

The U.S. should consider trade sanctions against Vietnam for ongoing failures until it fully embraces its responsibilities to conserve rhinos consistent with CITES and enacts a ban on all domestic rhino trade.



Out of 2,500 rhinos in Assam, India, at least 9 have been lost to poaching so far in 2013, 21 in 2012,⁸² 9 in 2011, and 7 in 2010.⁸³

Vietnam's Illegal Rhino Horn Trade: Undermining the Effectiveness of CITES

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16. MILLIKEN & SHAW, THE SOUTH AFRICA–VIET NAM RHINO HORN TRADE NEXUS, supra note 3, at 14; see also WORLD WILDLIFE FUND, WILDLIFE CRIME SCORECARD 17 (2012), available at http://awsassets.panda.org/downloads/wwf_wildlife_crime_scorecard_report.pdf.
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41. CITES Secretariat, Conservation of and Trade in African and Asian Rhinoceroses, SC61 Doc. 45.2 at 4 (Aug. 2011), available at <http://www.cites.org/eng/com/sc/61/E61-45-02.pdf>.
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43. *Ibid.*
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61. Decree 82/2006/ND-CP, supra note 223, art. 18.3, Appendix 1.
62. MILLIKEN & SHAW, THE SOUTH AFRICA–VIET NAM RHINO HORN TRADE NEXUS, supra note 3, at 138.
63. *Ibid.*
64. CITES, supra note 1, art. VIII(6); see also CITES, Resolution Conf. 11.17 (Rev. CoP14), National Reports (2007).
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66. See, e.g., *id.* at 147 (“[T]here does not appear to be any kind of regulatory framework in place [in Vietnam] to ensure that these ‘personal effects’ [rhino horn hunting trophies] are not used for ‘commercial purposes’ in violation of CITES. The failure to regulate such trade constitutes an avenue of trade and should be addressed as a matter of urgency.”).
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PO Box 53343
Washington, DC 20009 USA
T. +1 202 483 6621
F. +1 202 986 8626

62-63 Upper Street
London N1 0NY UK
T. +44 (0) 20 7354 7960
F. +44 (0) 20 7354 7961

info@eia-global.org
ukinfo@eia-international.org
www.eia-global.org