

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF
WILD FAUNA AND FLORA



Thirty-third meeting of the Animals Committee
Geneva (Switzerland), 12-19 July 2024

PANGOLIN CONSERVATION

1. This document has been submitted by the United States of America* in relation to agenda item AC33 Doc. 35 on Pangolins (*Manis* spp.).
2. The United States views pangolin conservation as a priority under CITES efforts. We take this opportunity to inform Parties of our renewed commitment to further advance pangolin conservation in the coming years, building on our past and on-going work to benefit pangolins. We urge other Parties to similarly take action to ensure the long-term protection of these imperiled species.
3. Pangolins represent a unique evolutionary group and play vital ecological roles in their habitats in Africa and Asia. Among their ecological interactions, they contribute to the regulation of ant and termite populations and create underground burrows that benefit other species.¹ Pangolins are the only remaining animals in their taxonomic order (Pholidota),² and although they are covered in an armor of protective scales, they are more closely related to carnivores than to anteaters.³
4. Pangolins are considered both *evolutionarily distinct and globally endangered* – making them what is called an “EDGE species,” like pandas and elephants.⁴ Pangolins are declining and are at risk of extinction. The International Union for Conservation of Nature (IUCN) Red List of Threatened Species lists all pangolin species as vulnerable, endangered, or critically endangered.⁵
5. The greatest threat to pangolin survival is overexploitation in the wildlife trade. At CoP17, the Parties included pangolins in CITES Appendix I, which took effect on January 2, 2017. The Parties took further action in adopting and strengthening Resolution Conf. 17.10 (Rev. CoP19) on *Conservation of and trade in pangolins*. Despite these protections, pangolins are widely labeled as the “most heavily trafficked mammal in the world.”⁶ For pangolins to persist, Parties must take immediate action to effectively implement CITES

* *The geographical designations employed in this document do not imply the expression of any opinion whatsoever on the part of the CITES Secretariat (or the United Nations Environment Programme) concerning the legal status of any country, territory, or area, or concerning the delimitation of its frontiers or boundaries. The responsibility for the contents of the document rests exclusively with its author.*

¹ Chao, JT, *et al.* 2020. Chapter 3: The role of pangolins in ecosystems. In: Challender, DWS, *et al.* (Eds). *Pangolins: Science, Society, and Conservation*. Academic Press.

² Wilson, DE, Mittermeier, RA. 2011. *Handbook of the Mammals of the World. Vol. 2: Hoofed Mammals*. Barcelona, Spain: Lynx Edicions.

³ Gaudin, TJ, *et al.* 2009. The phylogeny of living and extinct pangolins (Mammalia, Pholidota) and associated taxa: A morphology based analysis. *Journal of Mammal Evolution* 16: 235-305.

⁴ EDGE of Existence: Evolutionarily Distinct & Globally Endangered (website). <https://www.edgeofexistence.org/>

⁵ IUCN SSC Pangolin Specialist Group (website). www.pangolinsg.org/

⁶ Challender D., Waterman C., Baillie J. (2014) Scaling up pangolin conservation. IUCN SSC Pangolin Specialist Group Conservation Action Plan, Zoological Society of London, London

provisions.

6. Given the on-going concerns about the illicit trade in pangolins, we emphasize the need for urgent action for their survival. We especially encourage Parties to fully implement CITES Resolution Conf. 17.10 (Rev. CoP19) to protect pangolins.
7. The United States has been investing in pangolin conservation over the past decade. This work includes collaborating with Vietnam to convene the first meeting of pangolin range states in 2015 and working with the Zoological Society of London to launch MENTOR-POP (*Progress on Pangolins*) in 2016, which supported nine early-career Central African and Asian conservationists to champion the conservation of pangolins in Central Africa. The United States also conducted consumer research and demand reduction campaigns in Asia related to pangolin, ivory, rhino, and tiger specimens in 2018-2023, with support from the U.S. Agency for International Development. The carefully crafted messaging campaigns reached millions of people, and surveys indicated a decrease in both intention to purchase and actual purchasing of pangolin specimens.
8. The United States has also taken steps to combat pangolin trafficking by strengthening enforcement. The United States will continue to work closely with our international partners to disrupt and dismantle criminal organizations engaged in the trafficking of pangolins and take all available enforcement actions to protect pangolins from further exploitation.
9. To encourage action to support pangolin conservations, the United States is committed to making further efforts alongside international partners to help pangolins rebound. Over the next two years (through 2026), the United States will take the following actions:
 - (i) Issue a guidance document for U.S. state-level wildlife enforcement agencies to increase awareness of “use after import” requirements for CITES Appendix-I specimens, including pangolin specimens.
 - (ii) Publish the last 10 years of U.S. imports/exports and seizures of pangolin specimens on a publicly available website.
 - (iii) Provide information to the CITES Secretariat, in line with CITES Resolution Conf. 17.10 (Rev. CoP19) on *Conservation of and trade in pangolins*, on stocks of pangolin specimens held by the U.S. government, with reports including information on annual levels and trends in stockpiles, number, species, and sources of specimens, management measures, and the reasons for any significant annual changes in the stockpile levels.
 - (iv) Destroy U.S. government-held, stockpiled pangolin specimens not being used for *bona fide* scientific, educational, enforcement, or identification purposes (in line with Resolution Conf. 17.8 (Rev. CoP19)) and advertise an opportunity for the public to voluntarily relinquish any privately-held pangolin or other Appendix-I specimens for inclusion in the government’s stockpile destruction action.
 - (v) Review the status of pangolin species under the stricter domestic measures of the U.S. Endangered Species Act (ESA) and submit to the Office of the Federal Register a determination on the classification of these taxa under the ESA (pursuant to the procedures in 16 U.S.C. § 1533(b)(3)(B)).
 - (vi) Continue to support law enforcement activities to counter wildlife trafficking across pangolin range countries, maintain liaison with law enforcement agencies in source, transit and destination countries and support their investigative efforts.
 - (vii) Engage with pangolin range states on capacity-building efforts to enhance pangolin conservation and anti-poaching measures.