

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



Seventy-eighth meeting of the Standing Committee
Geneva (Switzerland), 3-8 February 2025

Compliance

Compliance matters

APPLICATION OF ARTICLE XIII IN BANGLADESH

1. This document has been prepared by the Secretariat.

Background

2. At its 77th meeting (SC77; Geneva, November 2023), pursuant to Article XIII of the Convention, the Standing Committee reviewed the information contained in document [SC77 Doc. 33.3](#) and recommended that Parties suspend trade for commercial purposes in specimens of CITES-listed birds with Bangladesh until Bangladesh is in a position to adequately regulate and monitor trade in CITES-listed birds, notably through the establishment of a reliable and efficient information system in accordance with Article VIII, paragraph 6, of the Convention. The Standing Committee also invited Bangladesh to submit a report on progress made with implementation in time for the Secretariat to report to the present meeting. Recommendations agreed by the Standing Committee covered:
 - the management of trade in specimens of CITES-listed birds;
 - legislation and law enforcement;
 - the handling of live animals and disposal of seized live specimens; and
 - the role of the Scientific Authority (SA), especially in relation to the making of non-detriment findings.
3. On 23 November 2023, the Secretariat published [Notification No. 2023/129](#) informing all Parties that the Standing Committee's recommendation that Parties suspend trade for commercial purposes in specimens of CITES-listed birds with Bangladesh entered into effect on 22 November 2023.
4. As requested by the Standing Committee, Bangladesh submitted its report on the implementation of the Article XIII recommendations. This document presents the Secretariat's review of this report, along with its recommendations to the Committee concerning the application of Article XIII in Bangladesh. The Secretariat notes that information reported in document [SC77 Doc. 33.3](#) remains pertinent. The present document thus focuses primarily on progress reported by Bangladesh in the implementation of the Article-XIII recommendations since SC77.

Progress made in the implementation of Article-XIII recommendations

Regarding management of trade in specimens of CITES-listed birds

- a) *Parties suspend commercial trade in specimens of CITES-listed birds with Bangladesh until the Party is in a position to adequately regulate and monitor trade in CITES-listed birds, on which progress could be revisited at SC78, notably through the establishment of a reliable and efficient information system in accordance with Article VIII.6.*

5. Since SC77, the Secretariat has provided support to Bangladesh with regard to the implementation of the recommendations of the Standing Committee, particularly concerning the effects of the recommendation to suspend trade for commercial purposes in specimens of CITES-listed birds with Bangladesh – see further paragraph 46 below .

To achieve compliance, the Committee recommended that Bangladesh:

i) establish, preferably an electronic system, resources permitting, to facilitate the issuance of permits and certificates and the verification of the legal acquisition of specimens in trade;

6. In its report, Bangladesh explained that since November 2022 and pursuant to the Pet Bird management rules (2020), Bangladesh issues no-objection certificates (NOCs) for the import of CITES Appendix-II and Appendix-III listed birds with information on source, ring number, and export permit presented in tabular form following Resolution Conf. 12.3 (Rev. CoP 19) on *Permits and certificates*.
7. Pursuant to recommendation a) i), Bangladesh reported that a new online “CITES Permit/Certificate and NOC System” has been developed with technical assistance from the Wildlife Conservation Society (WCS) Bangladesh Programme and was launched on 24 October 2024. This system reportedly allows for online applications for NOCs, verification of such NOCs, and their subsequent issuance with a QR code generated through the national digital filing system. The system automatically checks species nomenclature and status in the CITES Appendices and the International Union for the Conservation of Nature (IUCN) Red List of Threatened Species. The objectives of the new system are to ease the process of verification of imports at the ports of entry in Bangladesh (in particular the Hazrat Shahjalal International Airport, Dhaka), to ensure the transparency of the permitting and certification system, to enable the Management Authority (MA) to maintain an updated database of trade and documentation issued, and to report on species-specific imports/exports to and from Bangladesh.
8. Bangladesh indicated that trainings, supported by the issuance of a user manual, would be provided to the 77 registered bird farms/importers and customs officers to ensure effective use of this trade monitoring system before the end of 2024.
9. The Secretariat welcomes the development and launch of the new online permitting system. The Secretariat encourages Bangladesh to use the new online system at any point of entry or exit to or from Bangladesh (not only Hazrat Shahjalal International Airport). At the same time, the Secretariat notes that it is not clear that the system is used for the issuance of any CITES documentation and that there is no indication of how the system supports the MA in verifying the legal acquisition of specimens in trade. The Secretariat therefore considers that this recommendation is only partially implemented.

ii) maintain up-to-date records of traders and establishments, which should facilitate controls, communications, and collaboration;

10. Bangladesh reported that to control the operations of and facilitate communication with commercial pet bird farms and traders, the MA maintains an up-to-date database with all registered pet bird farms and traders. A copy of the database, currently maintained manually, was provided in an Annex to the report. Bangladesh explained that, in the future, the database should be updated automatically through the online system described under recommendation a) i).
11. The Secretariat considers this recommendation implemented but encourages Bangladesh to integrate this database as quickly as possible in the online permitting system to ensure automatic updates and continued relevance of this database. The Secretariat notes that, in its answer to recommendation a) i), the MA mentioned that it was planning to provide training to “the 77 registered bird farms/importers” but the list shared with the Secretariat only contains 74 registrations. More importantly, the list does not include any information on the kind of activities that the farm/trader is engaged in (breeding and/or trading) and no information on the types of species involved.

iii) liaise and integrate with other permitting/certification systems relating to the breeding of and trade in CITES-listed birds, including health and veterinary documentation, or customs declarations;

12. Bangladesh reported that the MA had organized a one-day workshop in September 2024 on *Integrating CITES Recommendation in Pet Bird Trade Management and Liaison with other Certification Systems*. The workshop gathered 24 government officials from Customs, the Customs Intelligence and Investigation Directorate (CIID), and the Department of Livestock. A subsequent survey conducted to determine current

gaps and barriers for collaborating and integrating other permitting/certification systems concerning the trading of CITES-listed birds had shown that the workshop improved awareness of and knowledge about the Convention, CITES-listed bird species, the permitting/NOC system, and the veterinary declaration/health checking procedure for around 70 per cent of the workshop participants. Thirty per cent, particularly from Customs, had only recently been assigned to the airport and were therefore not fully aware of systems in place. Participants had also made suggestions for further strengthening CITES compliance in Bangladesh.

13. While such trainings are essential to reinforce the capacities of staff and agencies playing a role in the implementation and enforcement of the Convention, the Secretariat notes that this training did not really address the question of the integration of the CITES permitting system with other permitting/certification systems relating to the breeding of and trade in CITES-listed birds, including health and veterinary documentation, or customs declarations. The Secretariat notes that it is unclear if and what further actions will be taken to implement this recommendation and consider that the recommendation remains to be implemented.

Regarding legislation and law enforcement

- b) *Bangladesh strengthen the regulatory framework in relation to management of and trade in birds and marine species, notably by ensuring appropriate measures to enforce the provision of the Convention, prohibit trade in violation of the Convention, and penalize offences related to wildlife crime (Art. VIII, paragraph 1).*

Consideration should be given to:

- i) *reviewing “Pet Bird management rules, 2020”¹ enacted under the provision of the Bangladesh Wildlife (Conservation & Security) Act, 2012, notably to bridge the gaps and close the loopholes that may be generated by the distribution of competences between different divisions, lack of adequate enforcement powers, the No Objection Certificates (NOC) system, lack of adequate penalties for offences related to wildlife crime and the final disposal of confiscated live specimens.*

14. Bangladesh reported that the Wildlife (Conservation and Security) Act, 2012, provides that no one can import or export CITES-listed specimens without having a license and/or permit. Clause 34 of the Act specifies the penalty for non-compliance with wildlife export and import regulations as up to one year imprisonment or a fine of up to BDT 50,000 (approximately USD 419) or both. For repeated offenders, penalties are imprisonment for up to three years or a fine up to BDT 1 lakh (approximately USD 1,677) or both.

15. To address recommendation b) i), the Bangladesh reported that a draft amendment to the Pet Bird management rules (2020) was prepared through a series of consultations it led with more than 100 representatives from registered bird farms, local community and conservation associations, pet bird breeder groups, wildlife professionals and experts including from IUCN Bangladesh and WCS Bangladesh. The suggested amendment to the Pet Bird management rules, including strengthened enforcement powers, adequate penalties for offences related to wildlife crime, inclusion of guidelines for the handling as well as disposal of confiscated live birds, and inclusion of import and export fee for the imported birds – among others – is currently under consideration by the Ministry of Environment, Forests, and Climate Change (MoEFCC).

16. The Secretariat notes that the revised Pet Bird management rules, once in place, would address most of the concerns raised. However, the Secretariat also notes that Bangladesh did not provide any indication of the timeline for the adoption of the new rules and invites Bangladesh to provide such an indication. Finally, the Secretariat notes the importance of ensuring that measures are also taken to assess the distribution of competences between different divisions and close any loophole identified and encourages Bangladesh to address this as well.

- ii) *strengthening the regulatory framework in relation to CITES-listed marine species and the implementation of the shark listings, including strengthening institutional cooperation between the Department of Fisheries, the CITES Management Authority and customs and develop protocols and guidelines for exchange of information, division of tasks, harmonized interpretation of applicable*

¹ The title of the Rules was erroneously indicated as “Pet Bird rearing rules, 2020” in the documents at SC77.

17. Bangladesh reported the following measures to implement this recommendation:

- a) Organization of a workshop in May 2024 (Dhaka) to harmonize the interpretation of applicable wildlife and fish/fish product trade regulations, to identify any gaps and barriers in their application, and to make recommendations for harmonizing fish and fish product trade regulations and export procedures in Bangladesh, including for sharks and rays.² Potential amendments to the Fish & Fish Product (Inspection & Quality Control) Rules, 1997 (FIQC) and revision of the Form of Application for Salubrity Certificate of Exportable Fish (Form-A) were discussed and were submitted to the Ministry of Fisheries & Livestock (MoFL) for endorsement and adoption.
- b) Preparation of amendments to the Wildlife (Conservation and Security) Act (2012) to include definitions for Schedule I and II; more severe penalties for the possession, consumption and trade of protected species; and transparent processes for the issuance of permits for protected/regulated wildlife (including CITES-listed marine species), their parts and derivatives.
- c) Preparation and submission of draft amendments to the Customs Import Policy (2022), the Technical Guidelines on Marine Fisheries Management and Harvest (2023), the Border Guard Bangladesh Act (2016), and the Coast Guard Act (2016) to the Bangladesh Forest Department to incorporate provisions from the Wildlife (Conservation and Security) Act, 2012, and thereby align these instruments.
- d) Strengthening of interagency cooperation through six technical trainings and five consultative meetings on wildlife crime investigation and improved prosecution conducted for a total of 656 law enforcement officers within 2023 and 2024. This included a multi-agency three-day consultation conducted in Barisal with the support of the United States Department of Justice International Criminal Investigative Training Assistance Programme (US ICITAP) in April 2024. The consultation gathered representatives from the MA, Wildlife Crime Control Unit, Customs, Department of Fisheries, River Police, and Marine Fisheries Associations. It focused on strengthening multi-agency efforts for combatting marine wildlife trafficking.
- e) Bangladesh further reported that it plans to conduct additional programmes with support from WCS Bangladesh and US ICITAP to further strengthen and sustain national capacity for CITES compliance monitoring and enforcement. Such programmes should cover:
 - trainings on the identification and prosecution of non-compliant trading companies;
 - detection of illegal shark and ray parts/product shipments;
 - CITES-compliant processing of shark and ray products;
 - interagency collaborations for improving trader registration and monitoring procedures for enhanced CITES compliance in fish/fish product trade;
 - follow-up on agreed actions to stop illegal shark and ray trade with Myanmar;
 - addressing regional trade concerns related to CITES-listed marine species;
 - enabling systematic marine SMART patrols for multi-agency monitoring and enforcement of marine protected areas;
 - preparation and revision of non-detriment findings (NDFs) for priority shark and ray species; and
 - holding annual national CITES seminars to reflect on progress made and define priorities for effectively and collaboratively countering wildlife trafficking and strengthening CITES compliance.

² Two workshops had been organized in December 2022 (Chattogram) and February 2023 (Khulna).

- f) Organization of a consultation workshop by the MA on 30 September 2024 with representatives from the Forest and Fisheries Department, Customs, CIID, US ICITAP, and WCS Bangladesh, and academia, which identified three key actions to address CITES recommendations:
- harmonization of regulations between Department Fisheries and Bangladesh Forest Department;
 - formation of a Task Force for Monitoring International Trade in Shark and Ray Products under CITES Regulations; and
 - development of a Guidance on the final disposal of seized specimens.

Draft Guidelines for trade control of CITES-listed marine species and a draft Protocol for seized marine specimens were finalized in October 2024; they provide guidance on actions to take and agencies to involve in such situations.

18. The Secretariat notes that substantive efforts have been deployed since SC77 to strengthen the regulatory framework in relation to CITES-listed marine species and institutional cooperation between the MA and other relevant agencies and offices. Consultations and workshops organized have addressed important issues which are relevant for the implementation of this recommendation. This is good progress and the Secretariat encourages Bangladesh to build on this momentum and set detailed timelines for the adoption and entry into force of proposed amendments and guidelines to ensure that the revised rules are in place as soon as possible.

iii) assessing relevant authorities' law enforcement capacity, their mandates and needs to strengthen the control of trade in CITES-listed species and the fight against transnational organized wildlife crime and, based on the assessment, build capacity among law enforcement agencies to strengthen CITES controls, using risk-based management approaches, in particular container controls at airports and seaports, as well as control of mailed parcels and of air cargo; combat transnational organized wildlife crime by strengthening criminal intelligence, exchange of intelligence, controlled delivery, wildlife crime investigation and prosecution, and financial investigations linked to wildlife crime.

19. Bangladesh reported that, with the support of US ICITAP, a mapping exercise of Countering Wildlife Trafficking activities in Bangladesh had been carried out through consultations with representatives from the judiciary, prosecutors, Police, Customs and Customs Intelligence officials, Forest Department, Department of Fisheries, Department of Livestock Services, environmental lawyers, and non-governmental organizations. The exercise analysed the strengths and weaknesses of these agencies in combatting wildlife crime and the result was shared with the Secretariat.
20. Based on this assessment, capacity-building programmes were carried out to strengthen CITES controls. As mentioned in paragraph 17 d) above, seminars, workshops and trainings have been organized with the support of WCS Bangladesh, US ICITAP, and Arannyak Foundation. These events were designed to reinforce the capacities of the different agencies in combatting wildlife crime and species identification. In April 2024, another three-day workshop with representatives from the Bangladesh Forest Department, Wildlife Crime Control Unit, Customs, Department of Fisheries, River Police, Marine Fisheries Association and academia was organized to advance multi-agency efforts for combatting marine wildlife trafficking from Bangladesh.
21. Bangladesh indicated that visits conducted in sea-, land-, and airports between 2018 and 2023 – including the land port in Benapole, Jashore, the inland container depot in Kamalapur, Dhaka, Hazrat Shahjalal International Airport in Dhaka, and the seaport in Chattogram – had shown that the scanning machines in use are unable to detect biological products. Only suspicious products are examined, and containers are opened in a very limited number of cases.
22. The Secretariat notes the commitment of Bangladesh to reinforcing the capacities of its national agencies' staff to raise awareness about the Convention, illegal trade, and ensure that said staff are better equipped to prevent, detect, and deter illegal trade. The Secretariat also notes the organisation and delivery of this series of trainings and workshops and the progress in building capacity of the relevant agencies. However, Bangladesh did not report any details on actions taken to strengthen CITES controls in practice, using risk-based management approaches, and in particular to implement stricter container controls at airports and seaports, as well as control of mailed parcels and of air cargo.

23. Similarly, the report does not contain any indication of measures taken to address the fact that scanning machines in use are unable to detect biological products, that only suspicious products are examined, and that containers are opened only in limited cases. Bangladesh reported needs for increased capacity-building on species identification, risk-based management approaches, and controls of mailed parcels and air cargo, and indicated that the organization of additional trainings on these issues is under consideration. However, it is unclear why these issues have not been addressed in the trainings conducted since SC77 as they formed the basis of this recommendation. This recommendation is therefore only partially implemented at this stage.

iv) establishing a national platform for enforcement cooperation and coordination between relevant authorities with the aim to strengthen the control of trade in CITES-listed species and to combat transnational organized wildlife crime, as recommended in paragraphs 9 a) and b) and Annex 3 to Resolution Conf. 11.3 (Rev. CoP19) on Compliance and enforcement.

24. Bangladesh reported that this recommendation aligns with the agreement reached by authorities at the 5th *National Seminar on Strengthening Compliance with CITES in Bangladesh* held in October 2023 which was attended by 37 representatives from four ministries, ten government agencies and five national institutes and non-governmental organizations. Bangladesh provided the full report of the seminar, at which the participants *inter alia* agreed to prioritize establishing a national task force for countering wildlife trafficking.
25. Following the recommendations by the seminar, Bangladesh further reported that, on 4 August 2024, a notification by MoEFCC had been gazetted, formally establishing the *National CITES Enforcement Committee*. The objective of this committee is to ensure regular exchange and dissemination of information relevant to the Convention and its implementation/enforcement; improve cooperation and coordination among the CITES MA and enforcement agencies; support the strengthening of trade controls in CITES-listed species; and support combatting transnational organized wildlife crime. The Committee brings together representatives from the Chief Conservator (CITES MA) Wildlife Crime Control Unit of Bangladesh Forest Department (also CITES MA), Department of Fisheries, Department of Livestock, Bangladesh Police, Bangladesh Customs, Customs Intelligence and Investigation Directorate, Border Guard Bangladesh, Coast Guard Bangladesh, and Bangladesh Navy.
26. The first meeting of the National CITES Enforcement Committee took place on 8 September 2024. Members had reiterated the importance of regular information exchange, including systematic and standardized reporting of wildlife crime incidents. It had been decided that the committee would meet every four months and maintain informal communications through a WhatsApp group. The Committee agreed that training to improve wildlife/trophy detection processes was a priority.
27. The establishment of the National CITES Enforcement Committee for combatting illegal trade in CITES-listed species, including transnational organized wildlife crime is a significant step. The Secretariat commends Bangladesh for the full implementation of this recommendation (see also paragraph 29 below). The Secretariat encourages Bangladesh to draw on the expertise of international partners supporting Bangladesh in the area of the fight against illegal trade and the enforcement of the Convention and invite them to participate in the meetings of the Committee, as appropriate. INTERPOL, the World Customs Organization, US ICITAP, or WCS Bangladesh, among others, could provide such expertise. With regard to the agreed priority to provide training to improve wildlife/trophy detection, the Secretariat notes that, over the last ten years, no export or import of CITES specimens has been reported by Bangladesh under purpose code H (trophy hunting) and invites Bangladesh to clarify this prioritization. As reported at SC77 and further discussed in this document, the issues faced by Bangladesh are mainly linked to illegal trade, particularly imports in live birds, and the application of the Convention to marine species, particularly sharks. It would therefore be advisable to make these the primary areas of focus of the National Committee.
28. The Secretariat notes that another area of work that could be undertaken by the National CITES Enforcement Committee would be the coordination of communication and sharing of information requested by other CITES Parties in the context of enforcement actions and prosecutions conducted in their countries concerning CITES-listed species traded to or from Bangladesh. Since SC77, the Secretariat has liaised with Bangladesh on requests for information issued by Belgium and the Netherlands in relation to ongoing cases concerning illegal trade in live birds with Bangladesh. The cooperation of all Parties is essential to ensure that the Convention can be properly enforced in situations where illegal trade is detected. The National CITES Enforcement Committee could play a central role in this domain.

- v) *scaling up efforts to conduct analyses of available information to map out organized crime groups active in the country and convene multidisciplinary investigative teams involving all relevant authorities to work in close collaboration with local authorities in key identified areas, and initiate intelligence-driven operations and investigations, with a particular focus on birds and sharks.*

29. Bangladesh reported that the MA maintains intelligence networks to combat illegal wildlife trade since 2020, including (i) a volunteer network of students, teachers, youth organizations and local/community-level conservation groups; (ii) open-source data from social media users; and (iii) reports made to the Facebook page of a Wildlife Crime Control Unit. In March 2023, Bangladesh had established a national platform with a standardized, centralized reporting system to enhance coordination and cooperation across government agencies (including, but not limited to the MoEFCC, MoFL, Ministry of Shipping, Police, and the Coast Guard) with a mobile phone application called “Wildlife Offence Reporting Tool (WORT)”.
30. Additionally, Bangladesh reported that US ICITAP is supporting the Forest Department in accessing an intelligence analysis software and crime mapping tools for three years, from 2023 onwards. This would enable Bangladesh to map out possible hotspots for wildlife crime; discover links in criminal networks; and develop plans to disrupt illegal activities. Bangladesh further reported that, in a next phase, Forest Department officers in every division would receive database management training, enabling them to enter and analyse wildlife crime data, and to plan focused activities and investigations at a regional level. Coordinated investigations between the MA and the Police Bureau of Investigation commenced in November 2023 and were instrumental in the apprehension of 19 wildlife offenders, the seizure of 10 capped langur (*Trachypithecus pileatus*, App. I), one Chinese pangolin (*Manis pentadactyla*, App. I), 20 alligator snapping turtles (*Macrochelys temminckii*, App. II), other specimens of non CITES-listed species, and the discovery of transboundary trafficking pathways.
31. The establishment of a national platform with a standardized, centralized reporting system and the launch of WORT are important steps to help Bangladesh combatting illegal trade in CITES-listed species, including transnational organized wildlife crime. The Secretariat consider that this this recommendation is partially implemented and encourages the Party to continue these efforts, including towards enhancing the analyses of available and new information to map out organized crime groups. In this context, the Secretariat notes that it would be important to consider linking the information gathered through the intelligence analysis software with the national platform on wildlife crime, if possible. This would allow for the creation of a national database and for relevant information to continue being gathered, analysed and provided to enforcement agencies for action.

Handling of live animals and disposal of seized live specimens

- c) *Bangladesh take measures to ensure strict implementation of Article VIII, paragraph 4 of the Convention, taking into account the recommendations and all management options contained in Resolution Conf. 17.8 (Rev. CoP19) on Disposal of illegally traded and confiscated specimens of CITES-listed species, and of Article VIII, paragraph 3 of the Convention, taking into account the recommendations in Resolution Conf. 11.3 (Rev. CoP19) on Compliance and enforcement. Consideration should be given to:*
- i) *maintaining an inventory of all seized live specimens of CITES-listed birds and ensuring that disposition of confiscated live specimens follows guidance in Resolution Conf. 17.8 (Rev CoP19), including the management measures of the specimens in the immediate short term (an initial period that may last between several hours to several weeks) and the longer term (which may often be a ‘permanent’ situation);*

32. Bangladesh reported that it had prepared an inventory of all live CITES-listed bird specimens seized at the airport and from registered bird farms since 2020, including information on the disposal of the confiscated specimens. A copy of this inventory was shared with the Secretariat. The inventory covers 12 cases of seizures of live and dead specimens of birds and indicates:
- the date and place of the seizure;
 - the species (common names) and the number of specimens seized;
 - the disposal method for live birds at the time of the seizure (transfer to rescue centres);
 - the disposal method for dead birds at the time of the seizure (burial);
 - the current status of the birds;
 - information on penalties incurred by offenders under the Customs Act (pecuniary fines); and
 - information on administrative actions taken by the Bangladesh authorities (warning notices, suspension or cancellation of licenses).

33. The Secretariat welcomes this inventory, which shows the efforts made by Bangladesh to combat illegal trade in live birds, dispose of confiscated specimens in accordance with Resolution Conf. 17.8 (Rev CoP19), and take action against offenders. The Secretariat encourages Bangladesh to continue developing this inventory, identifying the species concerned with their scientific names (or at least widely-used common names), keeping it updated, and not restricting it to seizures made at the airport and from registered bird farms. This would provide Bangladesh with a full visibility of cases of illegal trade in CITES-listed birds, actions taken by the authorities, and increased capacity to identify possible repeating offenders. In this context, the Secretariat notes that the annual illegal trade report (AITR) submitted by Bangladesh for the year 2023 contains 104 entries with regard to seized CITES-listed birds in 2023, including entries concerning non-native Appendix-I and Appendix-II bird species, particularly Psittaciformes. Yet, the inventory of all seized live specimens of CITES-listed birds contains only 5 entries for 2023. At the Secretariat's request, Bangladesh explained that the main reason for the discrepancy is that the AITR also contains information on seizures of illegally possessed native CITES-listed species that occurred inside the country – and not at the airport or at bird farms. The Secretariat notes that Bangladesh did not report any progress on any improvement of the measures to manage the specimens in the immediate short term (an initial period that may last between several hours to several weeks) and the longer term (which may often be a 'permanent' situation). This part of the recommendation is critical to address the number of birds that die because of inadequate measures to manage them in the short term, for instance when seized over a weekend. The Secretariat would recommend Bangladesh to prepare an action plan in line with Annex 3 of Resolution Conf. 17.8 (Rev. CoP19) to address this issue and fully implement this recommendation.

ii) establishing adequate control measures for seized live specimens of CITES-listed birds, including measures to reduce the risk of injury, mortality or theft from the rescue centre, and developing a uniform protocol for the marking, recording, handling and disposal of seized and confiscated live specimens;

34. Bangladesh explained that the Safari Park Gazipur (Dhaka) and the Dulahazra Safari Park (Chattogram) are the wildlife rescue centres designated by the MA in accordance with Article VIII, paragraph 5, of the Convention. According to the inventory discussed above, most confiscated live birds are sent to these two centres. Since the Secretariat's mission in June 2023, the bird enclosures in Safari Park Gazipur have been renovated with increased security measures (including the installment of 23 CCTVs). Thirty park staff have received refresher training on the safe handling of animals for reducing the risks of injury and mortality. Bangladesh has also introduced a *Protocol on Identifying, Recording, Processing, and Compounding Exotic Live Birds*, which has been reviewed by veterinarians, ornithologists and local avifauna experts, and shared with the Secretariat in English for any further comments. Bangladesh aims at organizing trainings on the implementation of this protocol, including for the marking, recording, handling and disposal of seized and confiscated live bird specimens.

35. The Secretariat notes the efforts made by Bangladesh to manage its wildlife rescue centres, train personnel and to ensure that seized and confiscated live birds can be correctly identified, marked, and housed in a manner that reduces risks of injury, mortality or theft from the rescue centre. The development of the protocol is also a good step forward. However, the Secretariat notes that no information has been provided concerning potential measures taken at the Dulahazra Safari Park (Chattogram). The inventory referred above shows that out of 172 bird specimens reported as transferred to rescue centres since August 2021, 92 are reported to still be alive, which amounts to only around 53 per cent survival rate. The inventory also indicates that 85 opaline lovebirds (*Agapornis fischeri*, App. II) have been transferred to the Safari Park Gazipur in July 2023 but does not specify whether these birds are still alive.

iii) developing and implementing a comprehensive strategy for border controls as recommended by Resolution Conf. 11.3 (Rev CoP19).

36. Bangladesh reported that this recommendation was addressed through the following actions pertaining to the individual elements contained in paragraph 13 a), subparagraphs i)-viii) of Resolution Conf. 11.3 (Rev. CoP19):

- To increase the quality of controls at the time of export and re-export, Bangladesh had organized four seminars with policy-level government officials to discuss training needs for enhanced CITES compliance, followed by 25 trainings and three workshops designed to enhance the enforcement capacity of front-line law enforcement officers from Customs and Bangladesh Forest Department.
- To apply due diligence to implement the Resolution Conf. 9.7 (Rev. CoP15) on *Transit and transshipment*, the MA had sent a letter to the Chairman of the National Board of Revenue and the

Director General of CIID informing them of the Resolution; in this context Bangladesh noted that no airports in the country currently process transits.

- To ensure awareness and training of officers in CITES matters, Bangladesh reported that a total of 115 trainings, workshops, seminars, and programmes had been conducted between 2018 and 2024 with over 2,937 officers from all relevant agencies to increase awareness about wildlife trafficking, expertise in identification of illegal specimens or products, thus strengthening CITES compliance.
- In order to address subparagraphs iv)-v) on document control and physical inspection, Bangladesh mentioned that the issuance of electronic NOCs with a QR code (see paragraph 7 above) and the newly introduced *Protocol on Identifying, Recording, Processing, and Compounding Exotic Live Birds* are tools used to also implement this recommendation.
- With regard to the use of scanning equipment (subparagraph vi), Bangladesh reported that an initial assessment was conducted by ICITAP to evaluate the technical infrastructure needs for preventing illegal wildlife trade at points of entry and exit, followed by a series of training sessions conducted from March-April 2024 on the use of search tools, including digital or thermal cameras, inspection cameras with lighting, and animal chip ID reader, with a total of 120 officials from the Wildlife Crime Control Unit (WCCU) and from about ten different customs offices, including the Hazrat Shahjalal International Airport (HSIA). The equipment is currently awaiting release from the Customs in HSIA and will then be distributed across these offices.
- With regard to subparagraph vii) on the use of detector-dog programmes as appropriate or other innovative detection programmes, Bangladesh reported that the MA had requested a duty place for WCCU officers to be permanently stationed at the International airport (HSIA) to assist customs with wildlife detection, identification and handling, rather than having to request access every time they need to enter the airport cargo terminal.
- Finally, with regard to subparagraph viii) on providing sufficient resources, Bangladesh reported that the resources invested by the Government and support provided by partners currently suffice for bringing about the necessary changes.

37. The Secretariat notes that Bangladesh has engaged in many activities corresponding to the individual elements of paragraph 13 of the Resolution and commends Bangladesh for these efforts. It would be important for Bangladesh to ensure that a border control strategy is in place for ongoing actions to be continued or completed, as the case may be and to ensure that this applies to land border control stations.

Scientific Authority and surveys

e) *Bangladesh take measures to ensure the appropriate implementation of Article III and IV with respect to non-detriment findings, taking into account recommendations contained in Resolution Conf. 16.7 (Rev. CoP17), giving consideration to strengthening its Scientific Authority by building capacity on wildlife issues, and allocating sufficient resources to undertake population surveys that can be used in the making of the non-detriment findings and in the setting of annual export quotas prior to authorizing exportation of CITES-listed species of fauna and flora, with a particular focus on commercially exploited aquatic species.*

38. In its report, Bangladesh indicated that the SA had reviewed and approved four NDFs for commercially exploited aquatic species/species groups:

- silky shark (*Carcharhinus falciformis*)
- smooth hammerhead (*Sphyrna zygaena*)
- mobulid rays (*Mobula* spp.) and
- rhino rays (including *Glaucostegus granulatus*, *G. obtusus*, *G. typus*, *G. thouin*, *Rhina ancylostoma*, *Rhynchobatus australiae*, and *R. laevis*).

Bangladesh indicated that the NDFs were based on available information on the population status, distribution, catch and landing records, biological and ecological factors, and trade information from Bangladesh and the Indian Ocean region. They resulted in negative NDFs for smooth hammerhead shark and all species of mobulid and rhino rays. Only silky sharks can be traded under the condition that specimens caught have a minimum total length of 200 cm. The NDFs, dated 2022, were submitted to the CITES Secretariat and have been published on the [page on NDFs and NDF guidance for sharks and rays](#) on the CITES website. Bangladesh noted that a revision of the silky shark NDF and additional NDFs for

other commercially exploited species/species groups are scheduled for early 2025. In this context, relevant agencies' staff have been trained for the preparation of these additional NDFs.

39. Bangladesh further reported that management and conservation actions proposed in these NDFs were incorporated in the *National Conservation Strategy and Plan of Action for Sharks and Rays in Bangladesh 2023-2033* a copy of which was provided to the Secretariat. The MA is now working with relevant stakeholders, including the SA where relevant, to address the following issues:
- reduce mortalities of threatened sharks and rays;
 - protect priority shark and ray habitat;
 - strengthen legal protection and enforcement;
 - engage fishing communities in shark and ray protection;
 - improve reporting and monitoring of shark and ray catches, landings, and trade; and
 - strengthen governance and coordination for improved marine conservation and sustainable fisheries.
40. In its report, Bangladesh indicated that, building on the 2021 amendment to shark and ray listings under the Wildlife (Conservation and Security) Act, 2012, the introduction of standard operating procedures for monitoring shark and ray landings from artisanal/small-scale coastal fisheries, interactive training programmes and tools, outreach strategies, central data depositories on wildlife crimes, and additional investments would be required to complete all the steps outlined in the *National Conservation Strategy and Plan of Action for Sharks and Rays in Bangladesh 2023-2033*.
41. The Secretariat welcomes the submission of the four NDFs. The Secretariat further welcomes the additional measures planned to ensure the conservation and sustainable use of sharks and rays in Bangladesh. This is a notable progress in the implementation of the Convention with regard to CITES-listed marine species. The Secretariat also notes that the report does not address the implementation of Article III and IV with respect to NDFs for other species than the ones mentioned and does not contain any information on setting voluntary annual export quotas for such other species. On the question of the strengthening of the national SA by building capacity on wildlife issues, the report only mentions that the MA prepared a proposal to update the Terms of Reference of the SA for consideration by the MoEFCC. Proposed changes include the nomination of representatives as well as appointing a new Chair, but there is no indication as to the decision made on these proposals or any action taken to strengthen the capacities of the SA. Similarly, on the question of the allocation of sufficient resources to undertake population surveys that can be used in the making of the NDFs, Bangladesh mainly refers to the capacity-building activities and trainings mentioned under previous recommendations, and its commitment to ensuring that the international trade in sharks and rays is legal, sustainable, and traceable.

Discussion and conclusions

42. The report submitted by Bangladesh demonstrates efforts and some progress towards the implementation of most of the SC77 recommendations. The development of an online permitting system allowing for the issuance of CITES documents and NOCs and the establishment of a first database of all registered pet bird farms and traders are important steps to ensure the full application of the Convention to trade in any CITES-listed species, including live birds. The trainings and workshops organized with the support of international partners are also instrumental in raising awareness about the Convention and its implementation and enforcement in Bangladesh. Legislative and regulatory initiatives, including the revision of the Wildlife (Conservation and Security) Act (2012), the Pet Bird management rules (2020) and the inclusion of marine species in the scope of Bangladesh' CITES national legislation, are important actions to ensure that the national legislation meets the CITES minimum requirements as set out in Resolution Conf. 8.4 (Rev. CoP15) on *National laws for the implementation of the Convention*, which is currently not the case. However, no timeline for the adoption and entry into force of these revisions and regulations has been provided (see paragraph 45 below). Concerning enforcement, the establishment of the National CITES Enforcement Committee, the use of analytical tools to assess trends in illegal trade, and improved cooperation between CITES and enforcement authorities are essential for combatting illegal trade in CITES-listed species, including transnational organized wildlife crime.
43. The Secretariat considers that notable efforts have been deployed by Bangladesh to regulate and monitor trade in CITES-listed birds through the establishment of an information system in accordance with Article VIII, paragraph 6. However, it appears that the online permitting system is not yet fully operational and that the database of registered pet bird farms and traders is neither up-to-date nor integrated with the online permitting system.

44. Concerning the strengthening of authorities, additional action would seem necessary to clarify the distribution of competences between different agencies and services to close any loopholes in CITES implementation. Measures also remain to be taken to strengthen the SA and allow, for example, for the undertaking of population surveys that will support the making of NDFs, in accordance with Articles III and IV of the Convention.
45. Concerning legislation, the amendments to the Wildlife (Conservation and Security) Act (2012) and the Pet Bird management rules (2020) have not been adopted, nor have the proposed amendments or additional regulations covering CITES-listed marine species. It will be important to proceed with the adoption of these revised legal instruments as soon as possible and continue to ensure that the Convention is fully applied to all CITES-listed species, including sharks and rays, and to the final disposal of any seized or confiscated specimens, in accordance with the Convention and Resolution Conf. 17.8 (Rev. CoP19). The Secretariat encourages Bangladesh to set detailed timelines for the adoption and entry into force of these amendments.
46. Concerning enforcement, ongoing efforts are necessary to strengthen the control of trade in CITES-listed species, the fight against transnational organized wildlife crime, and to build capacity among law enforcement agencies to strengthen CITES controls, using risk-based management approaches, in particular container controls at airports and seaports, as well as control of mailed parcels and of air cargo. The establishment of the National CITES Enforcement Committee is a step forward, but it would be advisable to prioritize the areas of work and to draw on the expertise of key partners. Additional measures should be taken concerning the fact that scanning machines in use at the ports of entry and exit are unable to detect biological products, that only suspicious products are examined, and that containers are opened in a very limited number of cases. Long-term strategies to further scale up the efforts to conduct analyses of available information to map out organized crime groups active in Bangladesh and support enforcement action is also important. The inventory of all live CITES-listed bird specimens seized since 2020 should be expanded so that the inventory can serve its purpose in collecting all data related to illegal trade in birds in Bangladesh. A strategy with monitorable control measures for seized live specimens of CITES-listed birds, including measures to reduce the risk of injury, mortality or theft from the rescue centres, as well as during the handling of specimens by enforcement authorities prior to transfer to rescue centres, needs to be developed and implemented as the inventory shows that a number of birds died while in the care of enforcement authorities or at rescue centres. The Secretariat further notes that the report submitted does not provide information on measures considered for the release of non-native birds seized by Bangladesh.
47. Finally, the Secretariat notes that, in December 2023, the CITES MA for Bangladesh reached out to the Secretariat to obtain guidance on the effect of the recommendation to suspend trade concerning two shipments of live birds about to be imported by Bangladesh from the Netherlands. The export permits had been issued by the MA of the Netherlands in August and September 2023, well in advance of the meeting of the Standing Committee that agreed the recommendation to suspend trade. The Secretariat provided advice on the practice with regard to recommendations to suspend trade, underlining that any issuance of permits after the entry into effect of the recommendation to suspend trade would constitute a breach of the recommendation to suspend trade. However, regardless of the Secretariat's advice, Bangladesh issued NOCs for these imports on 11 December 2023, well after the entry into effect of the Standing Committee's recommendation to suspend trade for commercial purposes in specimens of CITES-listed birds with Bangladesh. The Secretariat also followed up with the Netherlands, who indicated that they would like to avoid that such exports take place after the recommendation to suspend trade given the situation in Bangladesh, especially since live specimens were involved. The Netherlands therefore welcomed the decision of the Standing Committee to prepare draft guidance on the scope and application of recommendations to suspend trade and to consider developing standardized language for such recommendations. The Secretariat notes that this is addressed in document SC78 Doc. 33.1. Although the Secretariat also inquired on the reasons of the acceptance of these imports, it did not receive a definitive answer from Bangladesh.

Recommendations

48. The Standing Committee is invited to acknowledge the initial progress made by Bangladesh in addressing the compliance matters leading to recommendations agreed at its 77th meeting.
49. The Standing Committee is further invited to consider the following recommendations:

Regarding management of trade in specimens of CITES-listed birds

- a) The Standing Committee recommends that Parties continue to suspend commercial trade in specimens of CITES-listed birds with Bangladesh until the Party is in a position to adequately regulate and monitor

trade in CITES-listed birds notably through the establishment of a reliable and efficient system for maintaining records of trade in specimens of species included in Appendix I, II and III in accordance with Article VIII, paragraph 6 of the Convention.

Specifically, the Committee recommends that Bangladesh:

- i) operationalize and further develop the online permitting system “CITES Permit/Certificate and NOC System” to facilitate the management and issuance of CITES permits and certificates and the verification of the legal acquisition of specimens in trade;
- ii) further develop the database of all registered pet bird farms and traders to ensure that it includes all relevant information and is maintained up-to-date and to integrate it with the “CITES Permit/Certificate and NOC System” as soon as possible to facilitate control, communication and collaboration; and
- iii) explore linkages with and possible integration of the online permitting system with the national single window or other similar national systems, including health and veterinary certifications, or customs declarations.

Regarding legislation and law enforcement

- b) Bangladesh strengthen the regulatory framework in relation to management of and trade in birds and marine species, to ensure that the national legislation meets the CITES minimum requirements as set out in Resolution Conf. 8.4 (Rev. CoP15) on *National laws for the implementation of the Convention*, including ensuring appropriate measures to enforce the provisions of the Convention, prohibit trade in violation of the Convention, and penalize offences related to wildlife crime (Art. VIII, paragraph 1).

Specifically, the Committee recommends that Bangladesh:

- i) as soon as possible and within a set deadline adopt and implement the amendments to the Pet Bird management rules (2020) and the Bangladesh Wildlife (Conservation & Security) Act, 2012, to bridge gaps and close any loopholes that may be generated by the distribution of competences between different divisions, lack of adequate enforcement powers, the No Objection Certificates (NOC) system, lack of adequate penalties for offences related to wildlife crime and the final disposal of confiscated live specimens;
- ii) finalize the review and adoption of necessary amendments to the regulatory framework in relation to CITES-listed marine species and the implementation of the shark listings as soon as possible and within a set deadline;
- iii) implement appropriate measures to further strengthen capacity among law enforcement agencies to reinforce CITES controls, using risk-based management approaches, in particular container controls at airports and seaports, as well as control of mailed parcels and of air cargo. Additional measures should be considered to address the weakness that scanning machines in use at the ports of entry and exit are unable to detect biological products, that only suspicious products are examined, and that containers are opened in a very limited number of cases; and
- iv) take measures to further strengthen criminal intelligence, exchange of intelligence, controlled delivery, mapping of organized crime groups, wildlife crime investigation and prosecution. The newly established National CITES Enforcement Committee could be an important forum for the definition of measures of implement in this context and monitoring of their implementation.

Handling of live animals and disposal of seized live specimens

- c) Bangladesh take measures to ensure strict implementation of Article VIII, paragraph 4 of the Convention, taking into account the recommendations and all management options contained in Resolution Conf. 17.8 (Rev. CoP19) on *Disposal of illegally traded and confiscated specimens of CITES-listed species*, and of Article VIII, paragraph 3 of the Convention, taking into account the recommendations in Resolution Conf. 11.3 (Rev. CoP19) on *Compliance and enforcement*.

Specifically, the Committee recommends that Bangladesh:

- i) expand the inventory of all seized live specimens of CITES-listed birds, and include all pertinent data to obtain a complete view of all seizures of illegally traded specimens of CITES-listed birds and the disposal method used regarding confiscated live specimens, in accordance with Article VIII and Resolution Conf. 17.8 (Rev. CoP19);
- ii) develop and implement a strategy with monitorable control and management measures for seized live specimens of CITES-listed birds, including measures to manage the species in the short-term, and to reduce the risk of injury, mortality or theft from the rescue centres, taking into consideration Annex 3 of Resolution Conf. 17.8 (Rev. CoP19), and adopt and implement the *Protocol on Identifying, Recording, Processing, and Compounding Exotic Live Birds*; and
- iii) ensure that a border control strategy is in place to continue the efforts taken in this regard in line with paragraph 13 of Resolution Conf. 11.3 (Rev. CoP19).

Scientific Authority and surveys

- d) Bangladesh take measures to strengthen its Scientific Authority by building capacity on wildlife issues and allocating sufficient resources to undertake population surveys that can be used in the making of the non-detriment findings and the setting of annual export quotas for any CITES-listed species, when required, taking into account recommendations contained in Resolution Conf. 16.7 (Rev. CoP17) on *Non-detriment findings* and the preliminary *CITES Guidance on Non-Detriment Findings*, prior to authorizing exportation of CITES-listed species of fauna and flora.
50. The Secretariat finally recommends that the Standing Committee request Bangladesh to submit a report on the implementation of the above recommendations to the Secretariat 90 days before the 79th meeting of the Standing Committee for the Secretariat to report on the application of Article XIII in Bangladesh and provide its recommendations to the Standing Committee.