

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

Illegal trade and enforcement

Enforcement matters

REPORT OF THE SECRETARIAT

1. This document has been prepared by the Secretariat.

Background

2. In paragraph 32 c) of Resolution Conf. 11.3 (Rev. CoP19) on *Compliance and enforcement*, the Conference of the Parties directs the Secretariat to, subject to available resources:

- c) *submit a report on enforcement and compliance matters, which includes inter alia, the analysis of the Annual Illegal Trade Report and relevant information available through ICCWC partners as well as other verified sources, at each regular meeting of the Standing Committee and each meeting of the Conference of the Parties;*

3. In paragraph 13 a) and b) of Resolution Conf. 17.6 (Rev. CoP19) on *Prohibiting, preventing, detecting and countering corruption, which facilitates activities conducted in violation of the Convention*, the Conference of the Parties requests the Secretariat:

- a) *to continue to report credible allegations of corrupt practices, or the results of its own investigations that lead to credible suspicions of corruption, to the relevant national authorities and intergovernmental entities; and*

- b) *to include relevant information on such instances, and the outcome of investigations, in its report on enforcement matters to each Standing Committee meeting and each regular meeting of the Conference of the Parties, together with details of any anti-corruption activities the Secretariat has undertaken, along with its activities in implementation of Article XIII of the Convention;*

4. In the same Resolution, in paragraph 14, the Conference of the Parties:

14. *REQUESTS the Standing Committee to take note of instances of corruption affecting the implementation or enforcement of the Convention and, where appropriate, make recommendations to the Parties concerned and to the Conference of the Parties on ways in which it may be combated more effectively, whilst also considering possible actions that the Committee itself might take under Resolution Conf. 14.3 (Rev. CoP19);*

5. Resolution Conf. 11.8 (Rev. CoP17) on *Conservation of and control of trade in the Tibetan antelope*, in paragraph 2 b), directs the Standing Committee as follows:

- b) *the Standing Committee to undertake a regular review of the enforcement measures taken by the Parties in eliminating the illicit trade in Tibetan antelope products on the basis of the Secretariat's report, and to report the results at each meeting of the Conference of the Parties;*

6. At its 19th meeting (CoP19; Panama City, 2022), the Conference of the Parties adopted Decisions 19.77 to 19.79 on *Enforcement*, as follows:

Directed to Parties

19.77 Parties are encouraged to ensure that:

- a) *corruption risk mitigation policies and strategies are in place to address corruption risks associated with wildlife crime; and*
- b) *collaboration mechanisms are in place between CITES and anti-corruption authorities to facilitate swift and decisive action where corrupt activities are detected.*

19.78 *Parties are encouraged to, as appropriate, integrate financial crime investigations into the investigation of crimes involving wildlife, and to increase the use of financial investigation techniques to identify criminals involved in wildlife crime and their networks and address associated illicit financial flows from these crimes.*

Directed to the Secretariat with its partners in the International Consortium on Combating Wildlife Crime (ICWC) and other bodies

19.79 *Subject to external funding, the Secretariat shall work with its partners in the International Consortium on Combating Wildlife Crime (ICWC) and other bodies such as the Financial Action Task Force (FATF) and the Egmont Centre of Financial Intelligence Unit Excellence and Leadership (ECOFEL), to provide Parties with guidance on the measures they can take to combat money laundering associated with wildlife crime, and to promote the integration of financial crime investigations into the investigation of crimes involving wildlife.*

7. At CoP19 the Conference of the Parties further adopted *inter alia* Decision 19.80, paragraph a), on *Annual Illegal Trade Reports*, as follows:

Directed to the Secretariat

19.80 Subject to the availability of external funds, the Secretariat shall:

- a) *continue its work with the United Nations Office on Drugs and Crime (UNODC), ensuring that the CITES Illegal Trade Database and its data dissemination platform are maintained in accordance with the requirements agreed by the Conference of the Parties;*

8. At CoP19, the Conference of the Parties also adopted Decisions 19.81 to 19.83 on *Wildlife crime linked to the internet*, as follows:

Directed to the Secretariat

19.81 *Subject to external funding, the Secretariat shall commission a study to identify the CITES-listed species that are most commonly found in illegal trade on digital and online platforms, national laws, as well as best practices put in place by Parties to address wildlife crime linked to the Internet, and based on the findings of the study, prepare recommendations for consideration by the Standing Committee.*

19.82 *The Secretariat shall report to the Standing Committee, and subsequently the Conference of the Parties at its 20th meeting, on the implementation of Decision 19.81.*

Directed to the Standing Committee

19.83 *The Standing Committee shall review the Secretariat's report called for in Decision 19.81 and make recommendations as appropriate.*

9. In the present document, the Secretariat provides reporting on activities conducted in accordance with the Resolutions and Decisions adopted by the Conference of the Parties as outlined in paragraphs 2 to 8 above. The report of the Secretariat on compliance matters as anticipated by the provisions of paragraph 32 c) in

Resolution Conf. 11.3 (Rev. CoP19), is presented in document SC78 Doc. 33.1 on *Implementation of Article XIII and Resolution Conf. 14.3 (Rev. CoP19) on CITES compliance procedures*.

Implementation of Resolution Conf. 17.6 (Rev. CoP19) and Decision 19.77: Addressing corruption

10. At its 32nd meeting (AC32; Geneva, June 2023), the Animals Committee (AC) selected a number of species/country combinations for review, which included trade in *Macaca fascicularis* from Cambodia, under Resolution Conf. 17.7 (Rev. CoP19) on *Review of trade in animal specimens reported as produced in captivity*. The AC decided on a set of questions in relation to *Macaca fascicularis* from Cambodia that was communicated to the Party. At its 77th meeting (SC77; Geneva, November 2023), the Standing Committee considered document [SC77 Doc. 39.1](#) on *Enforcement matters*, which included the information received from the United States of America regarding long-tailed macaques (*Macaca fascicularis*) exported from Cambodia and claimed to be animals bred in captivity. The information received from the United States of America suggested that some of these animals might not have been bred in captivity. At its 33rd meeting (AC33, Geneva, July 2024), the AC considered document [AC33 Doc. 15.2](#) which included Cambodia's response to the questions from AC32. As outlined in summary record [AC33 SR \(agenda item 15.2\)](#), the Committee agreed to retain the species-country combination and requested Cambodia to provide clarifications about the high reproduction rates in writing to the Secretariat for review by the AC. At the time of writing the present document, the response received from Cambodia on 30 September 2024 was being reviewed by the AC as part of an intersessional consultation under Resolution Conf. 17.7 (Rev. CoP19).
11. In late November 2024, the United States of America shared with the Secretariat and the Chair of the Animals Committee extensive information on investigations conducted by authorities from the United States of America regarding *Macaca fascicularis* exported from Cambodia. This information seems to indicate the laundering of wild-caught long-tailed macaques through captive breeding facilities in Cambodia and that incidents of corruption may be facilitating the alleged illegal activities. During an online meeting on 26 November 2024, authorities from the United States of America provided a detailed briefing to the Secretariat regarding the findings of their investigations. Due to the volume of written and video information shared, the Secretariat was not able to process and thoroughly review these prior to the document deadline for the present meeting. However, the Secretariat draws the attention of the Standing Committee to this potential compliance matter in document SC78 Doc. 33.1 on *Implementation of Article XIII and Resolution Conf. 14.3 (Rev. CoP19) on CITES compliance procedures*. Based on the outcomes of discussions on this document, as well as on document SC78 Doc. 35.1 on *Implementation of Resolution Conf. 17.7 (Rev. CoP19)*, the Secretariat will consider if further work and steps might be needed to fully address this matter.
12. The Secretariat further notes that publicly available information on various other incidents that took place since SC77 indicates that corruption continues to pose a challenge in the context of addressing wildlife crime. In May 2024 for example, it was reported that a [parks board employee](#) was arrested in South Africa for the involvement in the theft of rhinoceros horns. Also in May 2024, a [police constable](#) was dismissed in India and a criminal case opened to investigate his involvement in exotic species smuggling. In August 2024, strict sentences were imposed on [five former employees](#) of the Noi Bai International Airport in Viet Nam, after they exploited their positions to facilitate the trafficking of rhinoceros horn and ivory. As reported at previous Standing Committee meetings, the Secretariat welcomes that Parties increasingly take strict action when corrupt practices are detected. Nevertheless, these examples emphasize the need for continued vigilance in the fight against corruption.
13. The Secretariat draws to Parties' attention to a paper on [Rooting out Corruption: An introduction to addressing the corruption fuelling forest loss](#). Launched by the United Nations Office on Drugs and Crime (UNODC) in December 2023, this publication aims to provide insights into the role and impact of corruption as it relates to forest loss. It highlights specific corruption risks and common forms of corruption that can occur at different decision-making levels. It also provides a high-level overview of existing anti-corruption tools and approaches which can assist in the prevention, detection and suppression of corruption (or corruption risks) fuelling forest loss. The paper is available on the [Enforcement Matters](#) page on the CITES website. Parties are encouraged to draw upon this resource and to bring it to the attention of their relevant national authorities.
14. The Secretariat notes that the provisions in Decision 19.77 are long term in nature and therefore proposes that Decision 19.77 be incorporated in Resolution Conf. 17.6 (Rev. CoP19). This would further strengthen the guidance in the Resolution for Parties to implement and strengthen measures to address corruption risks associated with wildlife crime. The Secretariat proposes an amendment to paragraph 4 of Resolution Conf. 17.6 (Rev. CoP19), as presented in Annex 1 to the present document. Should the Committee agree to this proposal, Decision 19.77 can be proposed for deletion.

Implementation of Decisions 19.78 to 19.79: Addressing illicit financial flows from wildlife crime

15. Limited information about activities undertaken by Parties to integrate financial crime investigations into the investigation of crimes involving wildlife has been shared with the Secretariat. As already noted at SC77, this is understandable considering that investigations into illicit financial flows are often of a sensitive nature and are therefore communicated on a “need to know” basis. The Secretariat however learned about activities that align with Decision 19.78 during its missions to China and Mexico concerning totoaba trade, as reported in document SC78 Doc. 33.12.1 on *Totoabas* (*Totoaba macdonaldi*). Authorities in China informed the Secretariat that, since 2019, the China Anti-Money Laundering Monitoring and Analyses Center provided four batches of financial information and intelligence related to the smuggling of totoaba swim bladders to support investigations of the Anti-Smuggling Bureau of the General Administration of Customs China. During the mission to Mexico in March 2024, the representative from Mexico’s Financial Intelligence Unit (FIU) highlighted that at least nine investigations were ongoing in Mexico in the context of suspicious transactions and money laundering related to totoaba.
16. The Secretariat also highlights the following activities and initiatives directly relevant to Decision 19.78.
 - a) In December 2021 the UNODC led the launch of quarterly [Private Sector Dialogues](#) on the disruption of financial crimes related to crimes that affect the environment. The Dialogues bring together relevant governmental authorities, including FIUs, law enforcement, the private sector, and civil society, with the aim of promoting improved detection and responses to financial crimes related to crimes that affect the environment. Since 2024, Regional Private Sector Dialogues are also organized as part of this initiative, allowing for a more in-depth discussion of regional priorities between different national stakeholders such as law enforcement authorities, banks, and local non-governmental organizations. The latest such dialogue was organized by UNODC in partnership with INTERPOL, the Nature Crime Alliance, and The Royal Foundation’s United for Wildlife, and held online in October 2024. Among the initiatives highlighted during the dialogue were for example the [South African Anti-Money Laundering Integrated Task Force](#) public private partnership, which focuses on combating illegal wildlife trade in South Africa.
 - b) In December 2023, the Royal United Services Institute published a report on [Using Closed Case Reviews in Financial Investigation of the Illegal Wildlife Trade](#), which provides a best practice guide for the use of such reviews to promote and support financial investigations in wildlife crime cases. This entails the analysis of cases that have been finalized and closed. The report describes *inter alia* how closed case reviews can be used in capacity-building, to develop risk indicators and to potentially reveal new leads that could support future investigations. Parties are encouraged to draw upon this resource and to bring it to the attention of their relevant national authorities.
 - c) In February 2024, The Royal Foundation’s United for Wildlife announced that ManchesterCF, a United for Wildlife Partner, extended eight free licences to members of the Financial and Transportation Taskforces at United for Wildlife, for the use of the [FIU CONNECT \(Wildlife Trafficking\)](#) training programme. The online training programme advises participants on suspicious financial patterns consistent with illegal trade in wildlife and identifies detailed case studies, examples and red flag indicators.
 - d) Addressing illicit financial flows from wildlife crime remains a matter of priority, as emphasized in the recent Resolution on *Tackling Illicit Trafficking in Wildlife* adopted by the UNGA in August 2023. The Resolution aligns with the provisions in Decision 19.78 and calls upon Member States to integrate, as appropriate, the investigation of financial crimes into wildlife crime investigations; increase the use of financial investigation techniques and public-private collaboration to identify criminals and their networks; and to enhance, where appropriate and in accordance with domestic law, the capacity of relevant agencies, including law enforcement and financial intelligence units, to carry out and support financial investigations into wildlife trafficking.
17. The Secretariat notes that the provisions in Decision 19.78 are long term in nature and therefore proposes that Decision 19.78 be incorporated in Resolution Conf. 11.3 (Rev. CoP19) to strengthen the guidance provided to Parties regarding the use of financial investigation techniques to address illicit financial flows from wildlife crime. The Secretariat proposes amending Resolution Conf. 11.3 (Rev. CoP19) by adding a new sub-paragraph d) to paragraph 9 under *Regarding enforcement at national level*. This proposed amendment is presented in Annex 2 to the present document. Should the Committee agree to this proposal, Decision 19.78 can be proposed for deletion.
18. Regarding Decision 19.79, the Secretariat hereby reports on activities undertaken in support of this Decision.

- a) Under the auspices of ICCWC, specialized trainings in financial investigations to enhance capacity of law enforcement were delivered. In 2023, over 400 law enforcement, financial and private sector professionals were trained in aspects related to anti-money laundering and addressing financial crime associated with wildlife crime. Further information on this can be found in the ICCWC [2023 Annual Report](#).
 - b) In April 2024, ICCWC also hosted an [Illegal Wildlife Trade Global Conference](#) in Brussels, Belgium. The Conference included a high-level panel discussion moderated by the Secretariat, which addressed *inter alia* incorporating financial crime investigations into the investigation of crimes involving wildlife. Other sessions of the Conference addressed this topic and provided participants with guidance on measures that could be taken to combat money laundering associated with wildlife crime. Also in April 2024, the UNODC Regional Office for Southern Africa and the Namibian Police Force held a [two-day workshop](#) on financial investigation linked to wildlife crime, in which law enforcement and criminal justice actors from Namibia participated.
 - c) This matter was also discussed at the UNODC Wildlife Inter-Regional Enforcement (WIRE) meeting held in Cape Town, South Africa, from 4 to 7 November 2024. The WIRE meeting identified the need to develop protocols on financial data analyses and sharing between the private sector and law enforcement, as well as the need to better involve financial institutions and forensic accounting companies in the financial analyses of wildlife crimes.
 - d) The Royal Foundation's United for Wildlife Global Summit 2024, also held in Cape Town, South Africa, in November 2024, placed emphasis on the crucial need for collaboration between finance, transport, and law enforcement sectors in the fight against wildlife crime. The CITES Secretary-General was invited to speak on CITES decision-making related to wildlife crime and emerging issues. In addition, the 35th INTERPOL Wildlife Crime Working Group meeting was held in Cape Town, South Africa, in November 2024. At this meeting, the issue of financial crimes associated with wildlife crime came under the spotlight, and information was shared on activities conducted as part of initiatives such as [Project Blood Orange](#) implemented in South Africa.
 - e) In December 2024 the Customs and Excise Department (C&ED) of Hong Kong Special Administrative Region of China and the Regional Intelligence Liaison Office for Asia and the Pacific (RILO A/P) of the World Customs Organization (WCO) hosted an *International Forum on Combating Money Laundering and Transnational Organized Crimes*. The CITES Secretary-General was invited to deliver a keynote address at the opening on CITES' role in combatting wildlife crime. The Forum equipped participants with a better understanding of the correlation between money laundering and transnational organized crimes, including those involving wildlife. Hong Kong C&ED during the Forum signed a memorandum of understanding with the University of Hong Kong, under which they will collaborate to explore the use of technology in detecting and addressing illegal activities associated with these crimes. Hong Kong C&ED will also work with the RILO A/P to explore how intelligence-sharing mechanisms can be strengthened to better facilitate cooperation between governments, law enforcement agencies and the private sector. It was also noted that Hong Kong C&ED plans to host specialized training courses on anti-money laundering and the use of technology to address such crimes, for Customs Administrations in the Asia-Pacific region.
19. The Secretariat will provide further reporting on the implementation of Decision 19.79 in its report to the 20th meeting of the Conference of the Parties (CoP20, Samarkand, 2025), in accordance with paragraph 32 c) of Resolution Conf. 11.3 (Rev. CoP19).

Implementation of Resolution Conf. 11.3 (Rev. CoP19), paragraph 32 c), and Decision 19.80, paragraph a): CITES Illegal Trade Database and data analyses

- 20. Similar to what was done for previous meetings of the Standing Committee and Conference of the Parties, data from the CITES Illegal Trade Database was drawn upon to inform the content of various documents prepared for the present meeting.
- 21. Data from the [CITES Illegal Trade Database](#) also significantly contributed to and supported the development of the [3rd edition of the World Wildlife Crime Report](#), which was launched on 13 May 2024. The report shows that wildlife crime continues to take place at significant scale and that 162 countries and territories and approximately 4,000 plant and animal species were affected by it in the period from 2015 to 2021. It also shows that some progress was made, noting that a combination of efforts from Parties yielded positive outcomes and resulted in the reduction of trafficking in, for example, elephant and rhinoceros specimens. The report provides a comprehensive assessment and systematic analysis of recent wildlife trafficking

trends, impacts and drivers, and further provides information on interventions that effectively contributed to countering wildlife crime. The report is available on the page on *Enforcement Matters* on the CITES website and Parties are encouraged to draw upon this resource to inform their decision-making and the development of law enforcement responses to wildlife crime.

22. As instructed by Decision 19.80, paragraph a), the Secretariat continues to work closely with UNODC on maintaining the CITES Illegal Trade Database and its data dissemination platform in accordance with the requirements agreed by the Conference of the Parties. As of November 2024, almost 130,000 seizure records reported by Parties through their AITR were recorded in the Database. At the time of writing, a total of 85 annual illegal trade reports related to seizures made in 2023 were submitted, including two reports from dependent territories.
23. Maintenance of the CITES Illegal Trade Database is currently subject to external funding. In July 2024, the Secretariat issued [Notification to the Parties No. 2024/077](#) informing Parties that it has not secured sufficient funds to maintain the database and its dissemination platform throughout the current intersessional period. In the Notification, Parties were invited to consider making additional contributions for this purpose. The Secretariat thanks the United Kingdom of Great Britain and Northern Ireland and Monaco for their funding contributions towards the implementation of the ICCWC Vision 2030, and Switzerland for its extrabudgetary contribution, with which the database can be maintained up to 30 June 2025. As outlined in Annex 4 to document CoP19 Doc. 34 on *Annual illegal trade reports*, cost to host and maintain the database and its data dissemination platform amounts to USD 236,034 per annum.
24. The Secretariat reiterates that, should the database be discontinued during periods when funding is not available, significant data gaps could occur and this could prevent the data from becoming the valuable resource it is intended to be. It might also not be practical or feasible to re-establish the capacity required to maintain the database and dissemination platform when funding becomes available again. The annual illegal trade report is mandatory, and the importance attached to this reporting should be reflected in the budget. To guarantee sustainability, it would be preferable for the costs required to maintain the database to be built into the core budget of the Secretariat. The Secretariat intends to convey the budgetary implications and importance of securing sustainable funding to maintain the CITES Illegal Trade Database, during the budget and work programme discussions for 2026 to 2028 at CoP20.

Implementation of Decisions 19.81 to 19.83 and Resolution Conf. 11.3 (Rev. CoP19), paragraphs 17 a) and 18: Wildlife crime linked to the Internet

25. To implement Decision 19.81, the Secretariat developed Terms of Reference and initiated discussions with the Global Initiative Against Transnational Organized Crime (GI-TOC) to ensure that this work is coordinated with the ECO-SOLVE project described in paragraph 31 below. The Secretariat thanks the Netherlands for the generous contribution to support the implementation of this Decision, which allows it to focus on two regions affected by wildlife crime linked to the internet. The study is not yet finalized so the Secretariat will provide more detailed reporting on the implementation of the Decision in its report to CoP20, in accordance with Decision 19.82.
26. It will be important to conduct further studies in at least two additional regions identifying the CITES-listed species most frequently involved in illegal trade on digital and online platforms and examining the relevant national laws and best practices implemented by Parties to combat wildlife crime related to the Internet. This will allow a better understanding of the global situation.
27. Considering the above, the Secretariat proposes that Decisions 19.81 to 19.83 be replaced with a new set of draft decisions. These are presented as draft decisions 20.AA to 20.CC in Annex 3 to the present document. Should the proposed draft decisions be agreed, Decisions 19.81 to 19.83 can be proposed for deletion.
28. To collect information on best practices for addressing wildlife crime linked to the Internet as envisaged by Resolution Conf. 11.3 (Rev. CoP19), paragraph 17 a), the Secretariat issued [Notification to the Parties No. 2024/046](#) of 13 March 2024. The Secretariat received replies from China, Colombia, Czechia, the European Union, Japan, Mexico, New Zealand, Trinidad and Tobago, South Africa, and the United States of America. ICCWC partner agencies, the Alliance to Counter Crime Online, the International Fund for Animal Welfare, the University of Adelaide, Australia, the University of New Jersey, TRAFFIC and the World Wildlife Fund for Nature also provided information to the Secretariat. The Secretariat is grateful for the information provided.

29. In accordance with paragraph 18 in Resolution Conf. 11.3 (Rev. CoP19), the Secretariat has compiled the information on [best practices and model domestic measures for addressing wildlife crime linked to the Internet](#). This compilation is available on the page on [Wildlife crime linked to the Internet](#) on the CITES website, under the heading *Measures and activities implemented to address wildlife crime linked to the Internet*.
30. The Secretariat draws the Parties' attention to the new INTERPOL e-learning course on "Best Practices in Investigating Cyber-enabled Wildlife Crimes" launched in May 2023. The course introduces law enforcement officers to the fundamentals of investigating illegal wildlife trade online. The course available via the [INTERPOL Virtual Academy](#) platform is designed to enhance investigative skills through interactive learning activities ranging from concept explanations, how-to demonstrations, real world case studies and recommendations from experienced practitioners, as well as knowledge assessments.
31. In addition, the Secretariat has continued to update the page on *Wildlife crime linked to the Internet* on the CITES website with relevant information on new developments and initiatives that may be of interest to Parties. In particular, the Secretariat highlights the [ECO-SOLVE project](#), a new programme of the GI-TOC, which *inter alia* includes a global monitoring system to collect and analyse data on wildlife crime linked to the Internet to inform law enforcement and private sector actions, while driving greater transparency and accountability in tackling illicit online markets for wildlife specimens. Initiatives such as the [Coalition to End Wildlife Trafficking Online](#) continues. Parties are encouraged to take note of these initiatives and engage with them, where possible and appropriate.
32. Since CoP19, ICCWC partner agencies have delivered several training interventions that align with Resolution Conf. 11.3 (Rev. CoP19), paragraph 17. b). These include training on Open-Source Investigation of Online Wildlife Crime in Sri Lanka (January and March 2023) by WCO; training on Investigation Techniques for Online Trade and Prosecution on Wildlife Crime in Lao People's Democratic Republic (October 2023) by UNODC; and training on Cyber-Enabled Wildlife Crime in Malaysia (December 2023), Indonesia (June 2024) and Viet Nam (September 2024) by INTERPOL. Further information on relevant activities conducted under the auspices of ICCWC can also be found in the ICCWC 2023 Annual Report.

Implementation of Resolution Conf. 11.8 (Rev. CoP17), paragraph 2 b): Conservation of and control of trade in the Tibetan antelope (*Pantholops hodgsonii*)

33. At SC77, as outlined in summary record [SC77 SR, agenda item 44](#), the Standing Committee noted document [SC77 Doc. 44](#) on *Conservation of and control of trade in the Tibetan antelope* (*Pantholops hodgsonii*), and further noted that comments on this document would be requested through a Notification to the Parties.
34. The Secretariat issued [Notification to the Parties No. 2023/130](#) of 24 November 2023, inviting comments on a number of SC77 documents and agenda items, including on document SC77 Doc. 44. The United States of America provided comments and supported noting the document. No other comments were received in response to the Notification. The United States of America underlined the emerging issue of shahtoosh shawls that comprise a blend of Tibetan antelope fibers and other species including cashmere goat, making detection more difficult, and encouraged Parties to take note of this trend for enforcement purposes. They further highlighted the inclusion of Tibetan antelope as "Endangered" under the United States Endangered Species Act, and that its Fish and Wildlife Service Wildlife Forensics Laboratory is undertaking work related to the identification of Tibetan antelope.
35. In document SC77 Doc. 44, the Secretariat reported that it conducted an analysis of Tibetan antelope seizure data submitted by Parties and included in the CITES Illegal Trade Database, covering the period 2016 to 2021. This showed that a total of 245 Tibetan antelope specimen seizures were made in this period.
36. For reporting to the present meeting, the Secretariat updated its analysis of data on Tibetan antelopes in the CITES Illegal Trade Database. This analysis covers the period 2016 to 2022, as presented in the table below. The data includes 275 seizure records of Tibetan antelope specimens reported by six Parties (India, Nepal, the Netherlands, Switzerland, the United Kingdom of Great Britain and Northern Ireland, and the United States of America). Most of these seizures (96%) were reported by Switzerland. Garments account for most seizures, amounting to 398 out of the total 472 specimens seized. Other seized specimens included medicines, extracts, cloths, skins, and horns.

Year	Total no. of seizures	Total no. of seized specimens	Number and type of specimens seized					
			Garments	Medicine	Extracts	Cloths	Skins	Horns
2016	19	27	25					2
2017	18	88	73	10		5		
2018	31	98	43	2		50	3	
2019	67	81	79		1	1		
2020	61	90	90					
2021	49	55	55					
2022	30	33	33					
Total	275	472	398	12	1	56	3	2

Table. Number of seizure records of *Pantherops hodgsonii* and number of *P.hodgsonii* specimens seized between 2016 and 2022 recorded in the CITES Illegal Trade Database.

37. Although data from the CITES Illegal Trade Database shows that illegal trade in Tibetan antelope specimens continued in the period since SC77, it also shows that seizures of Tibetan antelope specimens continued to decrease since 2020, with 90 specimens seized in 2020, 55 in 2021 and 33 in 2022. Parties are encouraged to persist in their efforts to address this illegal trade, which seems to be delivering positive results.

Other matters

38. In March 2024, the Southern African Development Community (SADC) Law Enforcement and Anti-Poaching (LEAP) Strategy 2022 – 2032 was launched. SADC is composed of 16 Member States¹ and the purpose of the [SADC-LEAP Strategy](#) is to provide a framework for national and regional cooperation. Its overall goal is to significantly reduce wildlife crime in the SADC region by 2032, whilst simultaneously strengthening law enforcement, management and governance systems. Four specific objectives serve as pillars for implementation of the strategy: reinforcing and professionalizing protected areas and transfrontier conservation areas management; sustainable use of natural resources and promoting community-based approaches; strengthening national counter wildlife trafficking operations, judicial processes, and legislation; and strengthening transnational and regional collaboration.

Recommendations

39. The Standing Committee is invited to:
- a) consider and agree for onward submission to CoP20 the proposed:
 - i) amendments to paragraph 4 of Resolution Conf. 17.6 (Rev. CoP19) on *Prohibiting, preventing, detecting and countering corruption, which facilitates activities conducted in violation of the Convention*, as presented in Annex 1 to the present document;
 - ii) amendment to Resolution Conf. 11.3 (Rev. CoP19) on *Compliance and enforcement*, by adding a new sub-paragraph d) to paragraph 9 under *Regarding enforcement at national level*, as presented in Annex 2 to the present document; and
 - iii) draft decisions 20.AA to 20.CC on *Wildlife crime linked to the Internet*, presented in Annex 3 to the present document;
 - b) take note of the information provided on activities conducted in accordance with the Resolutions and Decisions adopted by the Conference of the Parties as outlined in paragraphs 2 to 8 of the present document;
 - c) welcome the SADC Law Enforcement and Anti-Poaching Strategy 2022 – 2032, launched by SADC Member States; and
 - d) recommend to CoP20 that:

¹ SADC Member States: Angola, Botswana, Comoros, Democratic Republic of the Congo, Eswatini, Lesotho, Madagascar, Malawi, Mauritius, Mozambique, Namibia, Seychelles, South Africa, United Republic of Tanzania, Zambia and Zimbabwe.

- i) Decision 19.77 be incorporated in Resolution Conf. 17.6 (Rev. CoP19) and Decision 19.78 be incorporated in Resolution Conf. 11.3 (Rev. CoP19) and can be deleted; and
- ii) Decisions 19.81 to 19.83 on *Wildlife crime linked to the Internet* be deleted and replaced with the proposed new set of draft decisions.

DRAFT AMENDMENTS TO RESOLUTION CONF. 17.6 (REV. COP19)
ON *PROHIBITING, PREVENTING, DETECTING AND COUNTERING CORRUPTION,
WHICH FACILITATES ACTIVITIES CONDUCTED IN VIOLATION OF THE CONVENTION*

New text is underlined and deleted text is in strikethrough.

4. ENCOURAGES Parties, and especially CITES Management Authorities ~~to~~:
- a) ensure that corruption risk mitigation policies and strategies are in place to address corruption risks associated with wildlife crime;
 - b) ~~to~~-work closely with existing national anti-corruption commissions, and like bodies, law enforcement agencies, judicial authorities, as well as with relevant civil society organisations, in the design and implementation of integrity policies, which might also include deterrence initiatives, such as mission statements, codes of conduct and 'whistle-blower' schemes, taking into account the relevant provisions of the UNCAC; and
 - c) ensure that collaboration mechanisms are in place between CITES management and anti-corruption authorities to facilitate swift and decisive action where corrupt activities are detected;

DRAFT AMENDMENTS TO RESOLUTION CONF. 11.3 (REV. COP19)
ON COMPLIANCE AND ENFORCEMENT

New text is underlined and deleted text is in strikethrough.

9. RECOMMENDS that Parties:

[...]

- c) empower officials who have the responsibility to investigate crime involving fauna and flora with appropriate training, authority and resources to effectively carry out their responsibilities to address such crimes;
- d) as appropriate, integrate financial crime investigations into the investigation of crimes involving wildlife, and increase the use of financial investigation techniques to identify criminals involved in wildlife crime and their networks and address associated illicit financial flows from these crimes;
- ~~e~~) address the role of corruption in facilitating crime involving fauna and flora, as recognized in Resolution Conf. 17.6 (Rev. CoP19), through implementation of effective anti-corruption measures; and
- ~~e~~f) conduct outreach to and support training for regulated industry to ensure understanding of CITES and national requirements in order to enhance compliance and support the legal trade;

DRAFT DECISIONS ON *WILDLIFE CRIME LINKED TO THE INTERNET*

Directed to the Secretariat

20.AA The Secretariat shall:

- a) make available to the Standing Committee, once they are published, the two regional studies identifying the CITES-listed species most frequently involved in illegal trade on digital and online platforms, and examining the relevant national laws and best practices implemented by Parties to combat wildlife crime related to the Internet;
- b) subject to the availability of extrabudgetary resources, conduct further studies in at least two additional regions to identify the CITES-listed species most frequently involved in illegal trade on digital and online platforms. The studies should also examine the relevant national laws and best practices implemented by Parties to combat wildlife crime related to the Internet; and
- c) based on the findings of these studies, prepare recommendations for consideration by the Standing Committee.

20.BB The Secretariat shall report to the Standing Committee, and subsequently the Conference of the Parties at its 21st meeting, on the implementation of Decision 20.AA.

Directed to the Standing Committee

20.CC The Standing Committee shall review the Secretariat's report called for in Decision 20.AA and make recommendations, as appropriate.