

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

Asian big cats (Felidae spp.)

ASIAN BIG CATS IN CAPTIVITY

1. This document has been prepared by the Secretariat.
2. At its 14th meeting (CoP14, The Hague, 2007), the Conference of the Parties adopted Decision 14.69 on *Asian big cats*, which remains in effect, as follows:

Directed to the Parties, especially Appendix-I Asian big cat range States

14.69 *Parties with intensive operations breeding tigers on a commercial scale shall implement measures to restrict the captive population to a level supportive only to conserving wild tigers; tigers should not be bred for trade in their parts and derivatives.*

3. At its 19th meeting (CoP19, Panama City, 2022), the Conference of the Parties adopted Decisions 18.102 (Rev. CoP19), 18.108 (Rev. CoP19) and 18.109 (Rev. CoP19) on *Asian big cats (Felidae spp.)* as follows:

Directed to Parties

18.102 (Rev. CoP19) *Parties in whose territories there are facilities keeping Asian big cats in captivity referred to in Decision 18.108 (Rev. CoP19), paragraph a) are invited to welcome a mission from the Secretariat, to visit these facilities.*

Directed to the Secretariat

18.108 (Rev. CoP 19) *The Secretariat shall:*

- a) *subject to external funding, undertake a mission prior to the 77th meeting of the Standing Committee to those Parties identified in document SC70 Doc. 51 and in whose territories there are facilities which may be of concern keeping Asian big cats in captivity, with the purpose of gaining a better understanding of the operations and activities undertaken by these facilities; and*
- b) *report to the Standing Committee at its 77th meeting on implementation of Decision 18.108 (Rev. CoP19), paragraph a), and progress with regard to the missions concerned and formulate recommendations for consideration by the Standing Committee.*

Directed to the Standing Committee

18.109 (Rev CoP19) *The Standing Committee at its 77th and 78th meetings shall review the report and recommendations of the Secretariat concerning the implementation of Decisions 18.102 (Rev. CoP19) and 18.108 (Rev. CoP19) and determine whether any further*

time-bound, country specific measures are needed to strengthen the implementation of the Convention, of Decision 14.69 and of paragraph 1 h) of Resolution Conf. 12.5 (Rev. CoP19).

77th meeting of the Standing Committee (SC77; Geneva, November 2023): Recommendations adopted relating to Asian big cats in captivity

4. The Standing Committee considered document [SC77 Doc. 41.2](#) that reported on the Secretariat's work conducted in accordance with [Decision 18.108 \(Rev. CoP 19\)](#) on *Asian big cats (Felidae spp.)*, including missions to Parties with facilities keeping Asian big cats in captivity that may be of concern in Czechia, the Lao People's Democratic Republic, South Africa, Thailand and Viet Nam. At the time, the provisional date for a mission to the United States of America had been confirmed, and a mission to China was proposed for January 2024.
5. The Standing Committee agreed on the recommendations as contained under agenda item 41.2 in the summary record of the 77th meeting ([SC77 SR](#)), which are included in Annex 1 to the present document for ease of reference. The Standing Committee agreed on the general recommendations directed to:
 - a) all Parties in whose territories there are facilities keeping Asian big cats in captivity;
 - b) all Parties in whose territories there are facilities that breed large numbers of tigers and facilities housing large numbers of tigers; and
 - c) all Parties where a demand for tiger parts and derivatives exists.
6. The general recommendations referred to in paragraph 5 b) provides a sound approach for Parties to consider in their efforts aimed at combatting illegal trade in specimens of tigers (*Panthera tigris*). The Secretariat therefore proposes draft decisions relating to this recommendation as presented in Annex 2 to the present document.
7. In addition to the general recommendations, the Standing Committee also agreed on the recommendations directed to the Parties with facilities keeping Asian big cats that may be of concern that the Secretariat visited in 2023: Czechia, the Lao People's Democratic Republic, South Africa, Thailand and Viet Nam. The Committee also agreed on the recommendations directed to the Lao People's Democratic Republic relating the Asian big cats in captivity under the *Application of Article XIII in the Lao People's Democratic Republic*. Updates on the implementation of the recommendations by Lao PDR are provided in document SC78 Doc. 33.8 on *Application of Article XIII in the Lao People's Democratic Republic*.

Report by Czechia

8. Czechia was encouraged to conduct an inspection of the facility that the Secretariat could not visit during its mission and provide a report on its findings to the Secretariat by 5 November 2024 (i.e., 30 days before the document deadline of SC78). The report received from Czechia is attached as Annex 3 to the present document and includes an update on both recommendations directed to the Party. Czechia reported that the monitoring and control of the rendering plants where the carcasses are disposed will be strengthened through the amendment to the Czech Veterinary Act (Act No. 166/1999 Coll.) that would require rendering plants to inform veterinary bodies if a carcass brought for destruction is not complete. Relevant CITES enforcement bodies will be informed to undertake further investigations, as appropriate. Information relating to the cooperation and collaboration with the State Veterinarian Administration is also provided in Annex 3 to the present document.
9. With regards to the inspection of the tiger breeding facility that could not be visited during the Secretariat's mission in 2023, Czechia provided information on the inspection conducted in 2024. Based on this information the Secretariat notes that:
 - a) The owner of the facility reported that four cubs were born in captivity in July 2023 (2 months before the Secretariat's mission).
 - b) The cubs were donated to a different tiger breeding facility and this change of ownership is subject to further investigation.

- c) The authorities fined the owner because breeding of tigers in private facilities has been prohibited since 2022.
10. The Secretariat also notes that it was reported that further regular inspections of the facility will be conducted by national authorities to minimize the risk for possible misuse of tigers for illegal tiger trade from the facility.

Information received from other Parties

11. The Standing Committee did not request South Africa, Thailand and Viet Nam to report on the implementation of the recommendations agreed at its 77th meeting. The Secretariat notes that these Parties responded to the request for information on Asian big cats (*Felidae* spp.) published in Notification to the Parties [No. 2024/086](#) on 6 August 2024. The responses received and a summary of the responses are provided in document SC78 Doc. 43.1 on *Asian big cats (Felidae spp.) – Report of the Secretariat*.

Guidance on the evaluation of the conservation aspects of tiger captive-breeding facilities

12. At SC77, the Standing Committee requested the Secretariat, in consultation with the Animals Committee, to develop guidance to Parties on how to evaluate the conservation aspects of tiger captive-breeding facilities, subject to external funding.
13. The Secretariat proposed to the 33rd meeting of the Animals Committee (AC33; Geneva, July 2024) in document [AC33 Doc. 27](#) that the five steps to evaluate the appropriateness of *ex situ* management as part of a comprehensive species conservation strategy as outlined by the IUCN SSC [Guidelines on the use of ex situ management for species conservation](#) provides sufficient guidance that could assist Parties in evaluating the conservation aspects of tiger captive-breeding facilities.
14. The Secretariat also shared with the Animals Committee the following information and manuals received from the World Association of Zoos and Aquariums (WAZA) and the Association of Zoos and Aquariums (AZA):
- a) IUCN SSC [Guidelines on the use of ex situ management for species conservation](#) as well as the IUCN SSC [Position Statement On the role of botanical gardens, aquariums, and zoos in species conservation](#) that includes defined roles for *ex situ* management.
 - b) AZA's [Tiger Care Manual](#) that includes information relating to tiger management and care for tigers in captivity as well as information relating to AZA institutions' contribution to tiger conservation programmes.
15. In addition, the United States of America drew the Animals Committee's attention to the [IUCN Guidelines for determining when and how ex situ management should be used in species conservation](#) (2016) available on the CITES website (on the [Appropriate and acceptable destinations page](#)) and underscored the need to connect the conservation aspects back to the species in the wild.
16. The Animals Committee agreed that the IUCN SSC [Guidelines on the use of ex situ management for species conservation](#) provide guidance to Parties on how to evaluate the conservation aspects of tiger captive-breeding facilities, noting the additional guidelines mentioned in the plenary discussion (above).

Missions to Parties identified in document SC70 Doc. 51 in whose territories there are facilities which may be of concern keeping Asian big cats in captivity: China and the United States of America

17. The Secretariat draws the attention of the Standing Committee to the background information on the implementation of the Decisions relating to Parties with facilities keeping Asian big cats in captivity as contained in document [SC77 Doc. 41.2](#). In short, the Secretariat conducted the missions as directed in Decision 18.108 (Rev. CoP19) to gain a better understanding of the measures implemented by the identified Parties to implement paragraph 1 h) of Resolution Conf. 12.5 (Rev. CoP19) and Decision 14.69 (if applicable). This included obtaining information relating to:
- a) legislative controls pertaining to facilities keeping Asian big cats in captivity and the domestic and international trade in tigers and tiger products from the Party concerned;
 - b) organizational and administrative processes in place to administer these controls and action taken to enforce these measures; and

- c) operations and activities undertaken by tiger keeping facilities including stock management (live and other specimens), marking, record keeping, licenses/permits, conservation and other activities, and the overall purpose of the facilities.
18. The Secretariat visited tiger facilities of concern in the United States of America in March 2024 and China in May 2024. The missions were supported by the generous contribution of the United Kingdom of Great Britain and Northern Ireland. The Secretariat appreciates the support provided in this regard.
19. The delegation of the Secretariat comprised a staff member with responsibility for scientific issues, one staff member with responsibility for enforcement issues and a tiger expert whose participation was facilitated by WAZA as part of the MoU between WAZA and the CITES Secretariat. The Secretariat would like to express its appreciation to the authorities of the two Parties for facilitating the Secretariat's mission and for their active engagement, as well as WAZA for its expert support.
20. The format for the missions was similar to the missions conducted to Czechia, the Lao People's Democratic Republic, South Africa, Thailand and Viet Nam in 2023: an introductory meeting with representatives from all relevant government departments, a briefing session with local stakeholders and non-governmental organizations, followed by field visits to selected identified facilities.
21. The decision relating to the facilities to be visited was informed by discussions between the Secretariat and Parties concerned (China and the United States of America) to ensure logistical feasibility within the time and funding available, and to encompass various types of facilities. This included both public and private facilities, where possible, as well as those holding larger or smaller number of tigers, reflecting the range of concerns.
22. The legislative provisions used by China and the United States of America to regulate and monitor facilities keeping tigers in captivity, as well as enforcement related activities are summarized in Annexes 4 and 5 to the present document.

China

Legislative provisions

23. The key legislative provisions include the following:
- a) *Authorization to breed tigers in captivity*: Authorization is required, with the National Forestry and Grassland Administration (NFGA) responsible for considering applications. In May 2024, NFGA issued a Notification on special actions taken to address activities related to the captive-breeding of terrestrial wild animals, such as tigers. This notification includes the suspension of permits for the captive-breeding of terrestrial wild animals, such as tigers.
- b) *Movement, transport, and trade in specimens prohibited*: The movement, transport and trade of specimens (both live or dead) are prohibited, including between zoos and government facilities. This strict requirement, which provides clarity for enforcement purposes, lacks exemptions and, as mentioned above, could impact conservation breeding activities, particularly for South China tigers (*Panthera tigris amoyensis*).
- c) *Marking*: Marking includes microchipping of individual specimens. Some facilities also conduct DNA sequencing and use of ear tags in addition to microchips and stripe pattern identification.
- d) *Registers of births, deaths, and carcasses*: Facilities are required to maintain registers documenting births, deaths, and carcasses which must be kept secured.
- e) *Regular inspections*: Facilities undergo regular inspections to ensure compliance with legal provisions. These inspections are conducted annually and include both announced and 'covert' inspections.
- f) *Breeding restrictions*: While some facilities voluntarily restrict the breeding to limit the captive population, there is no legal requirement in place prohibiting breeding.
- g) *Management measures for stockpiles*: Skin and bones must be stored in a secure facility, sealed in bags, and recorded in a register. If a secure facility is unavailable, the specimens must be disposed of through incineration. Deaths must be reported to the provincial forestry authority.

Facilities keeping tigers in captivity visited by the Secretariat

24. The Secretariat conducted the mission to China from 27 to 31 May 2024. At the time of the mission, China had a total number of 2,744 tigers in 36 facilities. Three facilities keeping 560 tigers in captivity (two are privately owned and one government-managed) and one national park with a population of approximately 70 wild tigers were visited.
25. All three facilities keeping tigers in captivity visited by the Secretariat are open to the public and the main purpose of two of the facilities is public display (tourism) and education. Detailed information relating to the number of visitors and entrance fees for all facilities were shared and seems to be adequate to cover the costs associated with the keeping of tigers in captivity.
26. The facilities visited breed tigers in captivity and breeding is managed through birth control programmes that includes contraceptives and keeping sexes apart. The number of cubs bred varied with 20, 91 and 178 cubs bred in the three facilities since 2019. Detailed registers are kept on births and deaths, including medical records and necropsy reports. Reports are submitted to the provincial forestry authority on an annual basis based on reporting requirements (information relating to births, deaths, number of tigers, microchip numbers, images of tigers, medical history and stockpile information).
27. The government-managed facility also breeds tigers as part of a conservation programme with the aim to reintroduce tigers in the wild. In this facility, parentage is determined through DNA analysis, which is also used to determine the optimal breeding pairs to maintain a high level of diversity. The authorities invest in the research and documentation of breeding approaches and genetic studies to inform forensics and population management.
28. All live tigers are microchipped and ear-tags and DNA profiles are used in some facilities. There is a prohibition on the movement of all tiger specimens since 2018, which has impacted the conservation breeding programmes (as described below) as the exchange of live specimens between facilities is not allowed.
29. Carcasses, i.e. dead specimens, bones and skin, are kept and stockpiled in safekeeping facilities (freezers), while the meat and organs are destroyed. The parts associated with a specific tiger are marked with the details of the individual including the microchip number and detailed records are kept. Security systems and procedures are in place at all facilities visited.
30. The breeding programme for the South China Tiger (*Panthera tigris amoyensis*) that started with 46 individuals thirty years ago has grown to 240 individuals. A studbook is kept by the China Zoo Association and the captive population is managed using the PMx package of demographic and genetic analysis tools. Although pairing recommendations have been approved, it requires the transfer of individuals which is currently not allowed due to the prohibition on the movement of all tiger specimens. Since 2018, the prohibition on the transfer of species has prevented the movement of specimens paired under the management programme.

Observations by the Secretariat

31. The legal provisions used to regulate the activities carried out by the facilities appear to address key aspects that enable authorities to monitor the facilities and the tigers kept by these facilities. Currently, general prohibitions are in place, including for transport of all tiger specimens. These restrictions impact the conservation breeding programme for South China tiger (*Panthera tigris amoyensis*). If possible, a special exemption should be considered to allow the transport of individuals identified for pairing under the conservation breeding programme to the respective facilities, as this could help support the conservation objectives of the species.
32. The Secretariat made the following observations relating to the facilities and the implementation, compliance monitoring, and enforcement of regulatory provisions:
 - a) The facilities appear to be compliant with the legal provisions.
 - b) The private facilities could enhance the security of stockpiles and improve procedures based on practices observed at the government facility.

- c) The extensive information related to the genotyping and conservation breeding could benefit the conservation efforts.
 - d) The system to monitor the wild population in the national park could yield valuable information if sustained over the long term.
33. On the facilities, the Secretariat recommends that the following issues be considered:
- a) Standardized procedures for the treatment of carcasses, maintenance of registers, and reporting of information: China may consider promoting the further standardization of tiger carcass disposal management based on the latest notice released in 2024 that require the submission of detailed information relating to deaths to the NFGA.
 - b) The establishment of a central database containing information relating to all facilities: This database should include standardized information to be maintained and reported to the relevant authorities, such as the provincial authorities and NFGA, covering births, deaths, and securely stored carcasses.
 - c) Standard Operating Procedures for inspections and audits: This will assist in ensuring that all relevant aspects are inspected, including stockpiles and ensure that the specimens of dead tigers kept at the facility can be reconciled with recorded deaths. Conversion factors could be considered to support this reconciliation.
 - d) A process to formally register conservation breeding activities such as those for the South China tiger and other tiger sub-species: This could include provisions for the exchange of breeding pairs to support and enhance the breeding programmes.

United States of America

Legislative provisions

34. All commercial international trade in tigers, tiger parts, or products to or from the United States of America is prohibited under the Endangered Species Act and federal CITES implementing regulations. There are no registered CITES commercial breeding facilities and no legal commercial international trade in tigers to or from the United States of America. Under the Rhino and Tiger Conservation Act, the sale of tiger parts for human consumption or application is prohibited. Overall, the United States of America has a near total ban on tiger parts and products in its domestic market.
35. Compliance monitoring, particularly through inspections, is conducted by multiple agencies, including the USDA and state level wildlife agencies. While coordination is not mandated, federal agencies coordinate with their state partners and vice versa, as needed. All USDA inspections are unannounced.

Facilities keeping tigers in captivity visited by the Secretariat

36. At the time of the Secretariat's mission to the United States of America from 3 to 8 March 2024, there was no known comprehensive estimate of the number of tigers in captivity in the country. According to the legislative history of the Big Cat Public Safety Act (BCPSA) enacted in 2022, an estimated 20,000 big cats, including tigers, lions, jaguars, leopards, cougars, and hybrids, were kept in private ownership. Beginning December 2022, the BCPSA made the possession of big cats, including tigers, unlawful in the United States of America, with limited exceptions. Under the BCPSA, four categories of entities or individuals may legally possess tigers:
- a) *Entities exhibiting animals* to the public under a Class C license from the United States Department of Agriculture (USDA), or a federal facility registered with the USDA that exhibits animals, provided the entity or facility holds a license or registration in good standing and meets all the requirements of the Act for the exception.
 - b) *State institutions*, including state colleges, state universities, state agencies, or a state-licensed veterinarians.
 - c) *Qualifying wildlife sanctuaries* that care for prohibited wildlife species and meet all the requirements of the Act for the exception.

- d) *Qualifying transporters*, but only when they have custody of any big cat solely for the purpose of expeditiously transporting it to a person or entity that qualifies for an exception under the Act.
37. Due to limitations in its records system capabilities, the USDA is unable to provide a real-time number of captive tigers at USDA-licensed facilities. For the period October 2023-June 2024, the USDA conducted 262 inspections at facilities with 1,174 tigers in their animal inventory at the time of inspection. However, these figures do not necessarily represent the total number of tigers in USDA-licensed facilities, as the numbers reflect multiple inspections of the same facility in some cases and may include repeated counts of the same tigers within those facilities.
 38. The BCPSA required any entity or individual who does not qualify for one of the exceptions and was in possession of any prohibited wildlife species at the time of enactment to register each such animal with the United States Fish and Wildlife Service (USFWS) not later than 18 June 2023, allowing owners to register their pre-BCPSA big cats to continue to possess them under the pre-BCPSA exception. During that period, 52 tigers were registered with USFWS. There is no available estimate of tigers possessed illegally by persons that do not qualify for one of the BCPSA exceptions.
 39. Two facilities, both sanctuaries, were visited during the mission. Both are open to the public and, at the time of the visit, the two facilities had 46 and 38 tigers, respectively. Due to the logistical constraints, a third facility that had originally been identified could not be visited during this mission.
 40. Breeding is not permitted at the facilities. Males are neutered, and some females receive hormone treatment (implants) to prevent breeding.
 41. Inventories are maintained by the facilities and must be shared with the state authorities annually. The inventory includes detailed information on individual animals and their identifying markings. While some individuals are microchipped, all individuals can be identified by their stripe patterns, with photos available for identification purposes. All rescued animals are reported to the state authority and the USDA.
 42. Annual unannounced inspections are conducted and the licenses for the facilities remain valid for three years.
 43. A necropsy is conducted when a tiger dies, and the carcasses are either disposed of on-site or incinerated. There is no requirement for a veterinarian or government official to be present during the disposal of a carcass.
 44. The facilities visited generate some income through public displays, but both actively fundraise to support the costs associated with the keeping of tigers and other species in captivity.

Observations by the Secretariat

45. The legal provisions regulating the activities carried out by the facilities appear to address basic or minimum requirements to enable the authorities to monitor the facilities and the tigers they keep. Additionally, the newly enacted BCPSA makes it unlawful to import, export, transport, sell, receive, acquire, or purchase in interstate or foreign commerce, or in a manner substantially affecting interstate or foreign commerce, or breed or possess prohibited wildlife species (lions, tigers, leopards, snow leopards, clouded leopards, jaguars, cheetahs, and cougars, or any hybrids thereof), with certain limited exceptions. Facilities must comply with multiple legal provisions, at the federal, state and in some instances, local (county) levels. This results in multiple registration requirements in some states.
46. The Secretariat encouraged the United States of America to include any seizure data of specimens of big cats in its annual illegal trade report, using the report format and the most recent version of the *Guidelines for the preparation and submission of the CITES annual illegal trade report*. This would allow the data to be incorporated into the CITES Illegal Trade Database.
47. The Secretariat made the following observations regarding the facilities and the implementation, compliance monitoring, and enforcement of the regulatory provisions:
 - a) The facilities that were visited appear to be compliant with the legal provisions.
 - b) Although there are legal obligations to maintain registers and report to the relevant authorities, it was unclear from the facilities visited whether the information contained in the registers adheres to a

prescribed minimum or standardized set of details, such as marking, sex and age classes, and means of disposal.

- c) Mechanisms and processes to ensure cooperation and information sharing between government authorities were not evident during the visit. The United States of America provided the following information regarding collaboration between the various government authorities: USFWS/OLE works with federal partners, such as USDA Animal and Plant Health Inspection Service (APHIS), and state agencies as needed on investigations related to big cats. These joint investigations facilitate cooperation and information sharing as required, consistent with each agency's information-sharing authorities.
48. The Secretariat was unable to visit one facility that had been identified as a possible concern through the CITES process on facilities keeping Asian big cats in captivity. According to the United States of America, the owner of the facility had pleaded guilty to Conspiracy to violate the Lacey Act and Conspiracy to commit money laundering on 6 November 2023, and the facility was subsequently inspected by USDA/APHIS on 30 January 2024, shortly before the Secretariat mission. The inspection report was made available to the Secretariat at the time. According to the report, the facility had 55 tigers and 2 lion X tiger hybrids along with additional big cats at the time of the inspection. The facility remains operational and holds an active Class C exhibitor license.
 49. The Secretariat noted that the facilities visited sometimes house seized live specimens at the request of the relevant authorities. The facilities are not reimbursed for the overall cost, but the actual expenses associated with the transport of the live tigers to the facility can be claimed by the facility.
 50. During the stakeholder engagement, the following concerns were shared with the Secretariat regarding the interim regulations adopted in June 2023 to implement the BCPSA:
 - a) The regulations do not specify that the captive-breeding of tigers permitted only by licensed entities or registered federal facilities under BCPSA and the Animal Welfare Act must be solely for conservation purposes nor does it set any limits on the number of tigers (or other big cats) that can be born in captivity.
 - b) The interim regulations do not explicitly state that all parts, products, and derivatives of tigers (and other big cats) are prohibited from being sold or traded.
 - c) There were also questions about whether there will be a mechanism to measure the overall impact of the BCPSA on improving the monitoring and regulation of captive tigers in the United States of America.

Conclusions

51. The Secretariat recalls that, in paragraph 6 above, it proposes draft decisions relating to the general recommendations agreed at SC77 as contained in Annex 2 to the present document
52. Czechia provided a report on the inspection of the facility that the Secretariat could not visit during its mission and indicated that further regular inspections of the facility will be conducted by national authorities to minimize the risk for possible misuse of tigers for illegal tiger trade from the facility.
53. The Animals Committee agreed that the IUCN SSC [Guidelines on the use of ex situ management for species conservation](#) provide guidance to Parties on how to evaluate the conservation aspects of tiger captive-breeding facilities. The Secretariat notes that these Guidelines and other guidance documents referred to during the discussions at AC33 are available on the CITES website on the [Appropriate and acceptable destinations](#) page under 'General guidance'.
54. With regards to the missions to China and the United States of America, the legal provisions used to regulate the activities carried out by the facilities in the two countries appear to address key activities, enabling authorities to effectively monitor the facilities and the tigers kept by these facilities.
55. The general prohibitions in place in China, including those related to the transport of all tiger specimens, impacts the conservation breeding programme for South China tiger (*Panthera tigris amoyensis*). If possible, a special exemption should be considered to ensure individuals identified to be moved in terms of the pairing proposed through the conservation breeding programme can be transported to the respective facilities.

56. Regarding implementation of Decision 14.69, the Secretariat notes that facilities keeping tigers in captivity still exist in the two Parties with captive tiger populations that are not directly contributing to the conservation of tigers in the wild. The Secretariat found no evidence that the facilities visited are breeding tigers for their parts and derivatives.
57. While carcasses are not destroyed in China, detailed records of stockpiled bones and skins are maintained, guidelines are in place regarding stockpiles, and the prohibition on movement of tiger specimens seems to be enforced. In the United States of America, however, the disposal of carcasses does not appear to be specifically addressed, and no supervision of destruction processes is required.
58. Measures are in place to reduce or prevent breeding in some facilities, depending on the purpose of the facility.

Recommendations

59. The Standing Committee is invited to:

- a) note the report provided by Czechia relating to the inspection of the facility that the Secretariat could not visit during its mission;
- b) note the recommendation by the Animals Committee that the IUCN SSC [Guidelines on the use of ex situ management for species conservation](#) provide guidance to Parties on how to evaluate the conservation aspects of tiger captive-breeding facilities;
- c) review and submit the draft decisions in Annex 2 to the present document to the Conference of the Parties;
- d) encourage **China** to consider:
 - i) granting a special exemption for the transport of individual live South China tigers (*Panthera tigris amoyensis*) identified as part of the conservation breeding programme, facilitating their transfer to respective facilities based on proposed pairings;
 - ii) developing standardized procedures for the handling of tiger carcasses, maintaining registers, and reporting to relevant authorities to further strengthen the existing provisions;
 - iii) establishing a central database to consolidate information from all facilities keeping tigers in captivity, including standardized data reported to the relevant authorities (provincial and the National Forestry and Grassland Administration) covering births, deaths and secured carcasses/stockpiles of tiger specimens); and
 - iv) developing standard operating procedures for inspections and audits of facilities keeping tigers in captivity to ensure all relevant aspects are comprehensively inspected, particularly stockpile management and reconciliations of records of deaths and number of carcasses (that could include conversion factors to ensure all bones are kept secure).
- e) encourage the **United States of America** to consider:
 - i) establishing a central database containing information on facilities keeping tigers in captivity;
 - ii) developing standardized registers based on a minimum or standardized set of information, including marking, sex and age classes, births and deaths, and disposal;
 - iii) developing standardized procedures for the handling of carcasses, including their destruction;
 - iv) addressing the concerns raised regarding the interim regulations published to implement the Big Cat Public Safety Act, as outlined in paragraph 50; and
 - v) conducting a follow-up inspection at the facility that could not be visited by the Secretariat.
- f) agree that Decisions 18.102 (Rev. CoP19), 18.108 (Rev. CoP19) and 18.109 (Rev. CoP19) have been implemented and can be proposed for deletion.

ASIAN BIG CATS IN CAPTIVITY:
RECOMMENDATIONS AGREED BY THE 77TH MEETING OF THE STANDING COMMITTEE (SC77)
AS CONTAINED IN THE SUMMARY RECORD (SC77 SR)

Asian big cats in captivity

The Committee:

- a) urged all Parties in whose territories there are facilities keeping Asian big cats in captivity to:
- i) *implement paragraph 1 h) of Resolution Conf. 12.5 (Rev. CoP19) on the Conservation of and trade in tigers and other Appendix-I Asian big cat species; and*
 - ii) *strengthen compliance monitoring and enforcement of legislative provisions relating to facilities keeping tigers in captivity through the strict implementation of regulatory requirements ensuring that registers are accurately maintained; identification of individual tigers is a compulsory requirement (using microchips, DNA analysis and stripe identification images as appropriate); inspections are carried out regularly; that the disposal is done with the necessary controls and oversight, and any irregularities strictly penalized;*
- b) further urged all Parties in whose territories there are facilities that breed large numbers of tigers and facilities housing large numbers of tigers to consider taking a more methodical approach regarding these facilities to improve their conservation and educational value, as well as to put an end to the activities of facilities that do not have conservation or educational value, fail to comply with regulations and pose a risk regarding parts and derivatives from these animals entering illegal trade. Such an approach could include:
- i) *identification of facilities keeping tigers of genetic and conservation value and engagement of these facilities in coordinated conservation breeding for such animals;*
 - ii) *identification of facilities keeping tigers in captivity that are suitably located to ensure public access and that meet husbandry and welfare conditions based on national and international guidelines, and implementation of support programmes where needed (for example providing guidance on development of educational materials, signs and posters), for these facilities to fully transform into facilities with educational value that are raising awareness benefitting conservation of tigers in the wild, including bringing the attention of the public to illegal trade and the need to combat it;*
 - iii) *implementing and enforcing measures to reduce the number of tigers in facilities that are not contributing to conservation of wild tigers or have limited educational value, by restricting breeding of tigers (e.g., by separating male and female tigers, sterilization or other disposal measures, including euthanasia) within these facilities, as well as restricting these facilities from acquiring any new animals;*
 - iv) *taking into consideration Decision 14.69 that directs Parties to restrict the captive population to a level supportive only to conserving wild tigers and that tigers should not be bred for trade in their parts and derivatives, prohibiting the establishment of new facilities keeping tigers in captivity with narrow exemptions where warranted;*
 - v) *assessing the need for rescue centres, sanctuaries, or other disposal measures, including euthanasia, etc. as may be required due to the phase-out of intensive tiger operations; and*
 - vi) *reviewing of management practices and controls to regulate activities of facilities keeping tigers in captivity to ensure that they are adequate to prevent tiger specimens from entering illegal trade from or through such facilities, including licensing of such facilities, accurate record keeping of individual tigers, regular inspections and well-regulated disposal of tigers that die in captivity.*
- c) encouraged all Parties where a demand for tiger parts and derivatives exist to enhance their efforts in demand reduction activities related to illegal trade in Asian big cats in accordance with Resolution Conf.

17.4 (Rev. CoP19) on Demand reduction strategies to combat illegal trade in CITES-listed species *taking into consideration the Guidance on demand reduction strategies to combat illegal trade in CITES-listed species*;

- d) *also encouraged all governments, intergovernmental organizations, international aid agencies, and non-governmental organizations to urgently provide funds and other assistance to Parties with facilities that breed large numbers of tigers and those housing large numbers of tigers, to support the implementation of recommendation b) above;*

in addition to the recommendations a), b) and c) addressed to all Parties,

- e) *encouraged the Czech Republic to:*

- i) continue to collaborate and coordinate with the State Veterinary Administration to strengthen procedures relating to the disposal process, including improved monitoring to ensure complete destruction of carcasses; and*
- ii) conduct an inspection of the facility that the Secretariat could not visit during its mission and provide a report on its findings to the Secretariat by 30 days before the document deadline of SC78 (i.e., 5 November 2024).*

- f) *encouraged South Africa to:*

- i) standardize and strengthen legislative provisions relating to activities involving the keeping, breeding, international trade in and disposal of tigers;*
- ii) standardize processes relating to registers to be kept by facilities, inspections of facilities and destruction of carcasses through the development of standard operating procedures or other similar mechanisms;*
- iii) develop educational materials and displays to enhance the public education and awareness-raising value associated with the display of tigers;*
- iv) initiate a process to address the legislative gap relating to the regulation of activities involving alien Appendix-I listed species (including tigers);*
- v) address compliance monitoring and enforcement of the existing permit conditions for all facilities with a specific focus on the facilities with long term non-compliances matters;*

- g) *urged Thailand and Viet Nam to:*

- i) identify any specimens of tigers referable to the mainland Southeast Asian lineage (also known as Panthera tigris corbetti) and encourage facilities to engage in coordinated conservation breeding for these animals and other appropriate actions;*
- ii) strengthen measures to:*
 - A. restrict the breeding of tigers in captive facilities and the importation of tiger to these facilities to levels supportive only to conserving tigers;*
 - B. monitor individual tigers kept in facilities through the use of microchips, stripe pattern identification and DNA analysis, as appropriate;*
 - C. prohibit the establishment of new facilities keeping tigers in captivity with narrow exemptions where warranted; and*
 - D. restrict the parts and derivatives for which possession is authorized to prevent these specimens from entering illegal trade;*
- iii) develop educational materials and displays to enhance the public education and awareness-raising value associated with the display of tigers;*

- iv) *enhance standard operating procedures for inspections and disposal of specimens (including destruction of carcasses after verification of individual that died and train officials to undertake inspections and monitor the disposal of carcasses, where needed.*

The Committee agreed on two additional general recommendations as follows:

- h) *The Committee encouraged those Parties identified in document SC70 Doc. 51 in whose territories there are facilities which may be of concern keeping Asian big cats in captivity and who had not yet extended an invitation to the Secretariat to undertake a mission to do so and directed the Secretariat to report back to SC78.*
- i) *The Committee requested the Secretariat, in consultation with the Animals Committee, to develop guidance to Parties on how to evaluate the conservation aspects of tiger captive-breeding facilities, subject to external funding.*

DRAFT DECISIONS ON *TIGERS (PANTHERA TIGRIS) IN CAPTIVITY*

Directed to Parties in whose territories there are facilities that breed large numbers of tigers and facilities housing large numbers of tigers

20.AA All Parties in whose territories there are facilities that breed large numbers of tigers and facilities housing large numbers of tigers are urged to consider taking the following methodical approach regarding these facilities to improve their conservation and educational value, as well as to put an end to the activities of facilities that do not have conservation or educational value, fail to comply with regulations and pose a risk regarding parts and derivatives from these animals entering illegal trade:

- a) identify facilities keeping tigers of genetic and conservation value and engage these facilities in coordinated conservation breeding for such animals;
- b) identify facilities keeping tigers in captivity that are suitably located to ensure public access and that meet husbandry and welfare conditions based on national and international guidelines, and implement support programmes where needed (for example providing guidance on development of educational materials, signs and posters), for these facilities to fully transform into facilities with educational value that are raising awareness benefitting conservation of tigers in the wild, including bringing the attention of the public to illegal trade and the need to combat it;
- c) implement and enforce measures to reduce the number of tigers in facilities that are not contributing to conservation of wild tigers or have limited educational value, by restricting breeding of tigers (e.g., by separating male and female tigers, sterilization or other disposal measures, including euthanasia) within these facilities, as well as restricting these facilities from acquiring any new animals;
- d) taking into consideration Decision 14.69 that directs Parties to restrict the captive population to a level supportive only to conserving wild tigers and that tigers should not be bred for trade in their parts and derivatives, prohibit the establishment of new facilities keeping tigers in captivity with narrow exemptions where warranted;
- e) assess the need for rescue centres, sanctuaries, or other disposal measures, including euthanasia, etc. as may be required due to the phase-out of intensive tiger operations;
- f) review management practices and controls to regulate activities of facilities keeping tigers in captivity to ensure that they are adequate to prevent tiger specimens from entering illegal trade from or through such facilities, including licensing of such facilities, accurate record keeping of individual tigers, regular inspections and well-regulated disposal of tigers that die in captivity; and
- g) report on the implementation of this approach in their response to the Notification to the Parties issued by the Secretariat on Asian big cats (*Felidae* spp.) to facilitate reporting as required in Resolution Conf. 12.5 (Rev. CoP19) on *Conservation of and trade in tigers and other Appendix-I Asian big cat species*.

Directed to governments, intergovernmental organizations, international aid agencies, and non-governmental organizations

20.BB All governments, intergovernmental organizations, international aid agencies, and non-governmental organizations are encouraged to urgently provide funds and other assistance to Parties with facilities that breed large numbers of tigers and those housing large numbers of tigers to support the implementation of Decision 20.AA.

Report on the implementation of recommendations addressed to the Czech Republic at CITES SC 77

Asian Big Cats in captivity (SC77 41.2)

October 2024

(Compiled by the Ministry of the Environment of the Czech Republic)

At the 77th meeting of the Standing Committee (Geneva, 6-10 November 2023) the Committees adopted two following specific recommendations for the Czech Republic concerning Asian big cats in captivity (SC77 41.2).

The committee encouraged the Czech Republic to:

- i) continue to collaborate and coordinate with the State Veterinary Administration to strengthen procedures relating to the disposal process, including improved monitoring to ensure complete destruction of carcasses; and
- ii) conduct an inspection of the facility that the Secretariat could not visit during its mission and provide a report on its findings to the Secretariat by 30 days before the document deadline of SC78 (i.e., 5 November 2024).

The Czech Republic is submitting this report to inform the CITES Standing Committee about the implementation of both recommendations concerning Asian big cats in captivity.

1) Cooperation of CZ CITES bodies with State Veterinary Administration – destruction of carcasses

Since 2018 there have been **strengthened veterinarian measures focused on the physical check of tiger carcasses in rendering plants**, before they are further processed as a part of guidance for veterinarian bodies in the Czech Republic. The protocols for destruction of tiger carcasses issued by veterinarians after the death of the tigers are duly checked with respect to the weight, age and sex of the dead specimen sent for processing in order to be assured that no parts of carcasses have been misused for illegal trade.

To further strengthen the control of carcasses disposed a new obligation for operators of rendering plants has been added into the amendments of the Czech Veterinary Act (Act No. 166/1999 Coll.) to inform veterinarian bodies if the carcasses brought for destruction are not complete (proposed amendments of the Veterinary Act are currently in process of adoption by the Parliament of the Czech Republic).

If missing parts of carcasses are identified relevant CITES enforcement bodies are informed by veterinarians for further check of the owner of the tiger. Focus is particularly on the cases when parts of tigers (e.g. skins, bones etc.) are given for further processing to taxidermists as there is a risk of their misuse for illegal trade.

Furthermore, it is **compulsory** for the owners of registered specimens incl. tigers to **announce all relevant changes concerning the specimens bred incl. change of ownership or marking, death or loss of the specimen** etc. to the competent Regional CITES Management Authorities according to the CITES National Legislation (§23a of the Act 100/2004 Coll, On Trade In Endangered Species). In case of announced death of tiger specimens, the owners should provide copies of the protocol for destruction of tiger carcasses from the authorized rendering plants verified by veterinarians. Again, all potential discrepancies are communicated to the CITES Enforcement Authorities for further investigation.

The Czech Environmental Inspectorate also closely cooperates with State Veterinarian Administration when planning inspections of the facilities breeding tigers in terms of coordination of inspections, conducting joint inspections, sharing results of the inspections etc. Additionally, veterinarian bodies invited the representatives of the CEI to assist at the autopsy of two dead tigers on 6 February 2024.

The Ministry of Environment of the Czech Republic in cooperation with other CZ CITES bodies and the State Veterinarian Administration continuously evaluate the state of the Asian big cats species bred in captivity in the Czech Republic reflecting the stricter domestic measures adopted in the past in order to prevent and combat illegal trade in tigers, their parts and derivatives.

2) Report on the inspection of the Tiger breeding facility in [redacted] that was not subject to CITES Secretariat mission in 2023

On 19 August 2024 representatives of the **Czech Environmental Inspectorate (CEI) and the Ministry of Environment conducted an inspection of the remaining tiger breeding facility** identified as of possible concern according to the Decision 18.102 (rev. CoP19) for the Czech Republic, as this facility could not be visited by the CITES Secretariat during its tiger mission to the Czech Republic in May 2023 (when facilities of [redacted] ere visited).

The inspected tiger breeding facility located in [redacted] about 15 km north of [redacted] belongs to the private family house owned by [redacted] and consist of several animal enclosures surrounding the family house (please, see the photo documentation attached).

The main aim of the inspection was to focus on tigers kept in the facility and check of their legal origin in accordance with the CITES national legislation (Act No. 100/2004 Coll., On the Protection of Endangered Species) and the EU Wildlife Trade Regulations. For this purpose, the breeder **presented CITES documentation for all the tigers owned** – registration certificates confirming that the tigers have been properly registered according to the CITES national legislation, the EU certificates issued according to the Council Regulation No. 338/97 (if relevant) and other relevant documents to prove legal origin, incl. records of breeding required according to the CITES national legislation, veterinary documents etc.

From the total amount of 15 currently kept specimens of tigers owned by the breeder, 9 of them were identified to be present in the facility in [redacted] (incl. one *Panthera tigris/Panthera leo* hybrid) during the inspection of the facility. For details regarding the animals, please see the

table below. Remaining animals were placed in the facilities of (4 tigers) and (2 tigers) also owned by ; this was only temporary placement of animals during the tourist season from April to September 2024.

An overview of tigers present in the facility during the inspection in on 19 August 2024:

No.	Microchip No.	Source Code	CZ Registration	EU certificate	Additional information
1.	276098200029084	C	STC/00155/2015	DE-GT-131204173	Born and bred in captivity in Germany, date of birth: 31.8.2013, date of import to CZ: 4.2.2015, male, white colour
2.	956000009442355	C	STC/00923/2020	-	Own breeding from registered parents, date of birth: 15.5.2020, female, white colour
3.	956000005698675	C	STC/00924/2020	-	Own breeding from registered parents, date of birth: 15.5.2020, female, white colour
	956000009573894	C	STC/00302/2018	-	Own breeding, date of birth: 22.2.2018, female
5	956000009523910	C	STC/00303/2018	-	Own breeding, date of birth: 22.2.2018, male
6.	982000364411533	C	STC/01194/2017	15LT/7/C/0092	Born and bred in captivity in Lithuania, date of birth: 10.5.2015, date of import to CZ: 6.6.2017, female
7.	982000402854097	C	STC/01197/2017	17LT/7/C/0079	Born and bred in captivity in Lithuania, date of birth: 27.4.2017, date of import to CZ: 6.6.2017, female
8.	941000022674929	C	STC/00477/2022	-	Own breeding from registered parents, date of birth: 16.4.2022, male
9.	900008800194600	C	PHA/01405/2012	CZ/PHA/02946/2012	Own breeding from registered parents, date of birth: 9.3.2012, male <i>Panthera tigris</i> x <i>Panthera leo</i> hybrid

As can be seen in the table above, all the tigers kept are **uniquely marked by microchips and are of legal origin** (born and bred in captivity). Although the marking of the tigers could not be checked during inspection on 19 August 2024, it had been checked for all tigers kept by the owner during previous inspections conducted in the past by the CEI.

Additionally, **from all the tigers** kept by the owner **samples of hair or blood have been taken for DNA analysis and storing in national Tiger DNA database** for further possible identification of tiger specimens.

Regarding the **management practices and controls in place with respect to the disposal of specimens from tigers that die in captivity the breeder follows the prescribed procedures** as specified under point 1) of this document, incl. announcement of the death of the animals to official veterinarian/CITES bodies and further processing of supervised complete carcasses in rendering plants. There are no stockpiles of tiger carcasses stored in the breeding facility.

Concerning new tiger offspring bred in the [redacted] recently, the owner reported 4 tiger cubs born in captivity in July 2023. These animals have been registered and then donated to a different tiger breeding facility. Since 2022 any new breeding of tigers in private facilities is prohibited according to the national veterinary legislation, therefore, the owner has been fined and the circumstances of the change of ownership of the tigers are currently being a subject of further confirmation.

Conclusion

During the inspection of the facility in [redacted] on 19 August 2024, 9 live tigers in total were identified in the facility by the representatives of Czech Environmental Inspectorate and the Ministry of Environment of the Czech Republic, **relevant documents to prove legal origin of the tigers were submitted by the breeder.**

Apart from this inspection, a number of preceding inspections had been conducted in the given facility by the Czech Environmental Inspectorate in 2023 (4x) and 2024 (4x), so the **facility in [redacted] is and will be further under regular supervision of CZ CITES enforcement authorities, hence minimizing risk for possible misuse of tigers for illegal tiger trade from this facility.**

Photo documentation – breeding facility, 19.8.2024



LEGISLATIVE AND ENFORCEMENT MEASURES
IMPLEMENTED BY CHINA

Legislative provisions and implementation

1. A number of legislative provisions are used to regulate activities involving tiger (*Panthera tigris*) in China. This includes the following:
 - a. *Wildlife Conservation Law of the People's Republic of China* (1988, amended / revised in 2004, 2009, 2016, 2018 and 2022)– Article 25 stipulates that captive-breeding of wild animals require authorization and is subject to a licensing system.
 - i. The government supports scientific research institutions to breed nationally protected wildlife for species conservation purposes.
 - ii. Captive-breeding of nationally protected wildlife require approval by the competent wildlife protection department of provinces, autonomous regions, and municipalities directly under the Central Government, and obtain a captive-breeding license, except as otherwise provided by the State Council for the approval.
 - iii. Through the 2022 amendment the cooperation among various law enforcement departments strengthened and penalties for illegal activities increased.
 - b. *Notice of the State Forestry Administration on Strengthening the Protection and Management of Wild Tigers and Strictly Cracking down on Illegal and Criminal Activities such as Smuggling and Illegal Trading of Tiger Products (Forestry Conservation Announcement [2009] No. 298, December 25, 2009* – issued to strengthen the protection and management of wild tigers and crack down on illegal activities such as smuggling and illegal operation of tiger products:
 - i. Effectively strengthen the protection of wild tiger populations and their habitats
 - ii. Strictly crack down on illegal and criminal activities such as smuggling and illegal operation of tiger products
 - iii. Strictly regulate tiger domestication and breeding activities, strengthen supervision of tiger products after the death of captive bred tigers. This includes the following that relates to strengthening management of breeding activities and oversight of tiger products after the death of a tiger:
 - All tiger breeding activities must have a breeding license in accordance with the legislation, and have facilities and conditions for viewing and exhibitions;
 - detailed records of all individual captive bred tigers must be kept and a unique labeling and information system should be implemented to establish a comprehensive file on each tiger in a breeding facility, ensuring tracking and management;
 - the carcasses of tigers that died in captivity (body or tiger bones, skin, and other tiger products) must continue to be sealed and registered, just like the tiger bones sealed since 1993, and must not be used without permission (those that have been unconditionally sealed, can be destroyed under the on-site supervision of the provincial forestry regulatory department to strictly prevent their illegal entry into the market); and
 - news media, newspapers, magazines and other promotional methods should be used to warn the public not to purchase illegal tiger bone products and wear tiger skin clothing from illegal sources (advocate for the public to consciously resist illegal behavior, report illegal activities).

- c. *The State Forestry Administration issued the forestry industry standard: "Technical Code of Feeding and Management for Wild Animals – Siberian Tigers" (LY/T 2199-2013) specifies technical requirements for keeping facilities, breeding management, record management, disease management and treatment of carcasses:*
- i. The captive keeping facility must be divided into breeding areas, animal hospital or treatment areas, cold storage rooms and rooms to prepare food for the tigers. The zoo keeping area should be divided into an inner area, outer areas, indoor operation channels (rooms), breeding rest rooms and feed processing rooms. Outside areas can be divided into juvenile tiger areas, sub adult tiger areas, adult tiger areas, breeding tiger areas, breeding areas, and wild training areas. Smaller cage areas should be divided into breeding cages, adult tiger cages, subadult tiger cages, and juvenile tiger cages; Veterinary hospitals should be equipped with treatment rooms, isolation rooms, laboratories, operating rooms, dissection rooms, areas where medicine are kept etc.;
 - ii. The management of animal breeding, which is divided into:
 - Daily management of cage breeding and daily management of scattered areas, with clear requirements for the appointment of breeders and the provision of food;
 - Reproductive period management, including requirements for population management, seed selection, cage mating, prenatal management, litter observation, lactation management, etc.
 - iii. There are also regulations in areas such as feeding management, safety management, and disease prevention and control;
 - iv. Treatment of carcasses.
 - If a tiger dies from illness, timely dissection and necessary pathological examination should be conducted, anatomical records and death registration should be filled out, and an necropsy (anatomical) report should be written.
 - Dead skin and bones should be uniformly sealed and cannot be disposed privately.
 - If conditions permit in the breeding unit, harmless treatment facilities can be established for medical waste, dead bodies, organs, etc.; and
 - v. Archive management, including technical archives, breeding records, medical records, individual archives, imaging materials, etc.
- d. *Circular of the State Council on Banning the Trade of Rhinoceros Horn and Tiger Bone, 1993 – Banning all trade activities of rhinoceros horn and tiger bone (re-enforced in 2018).*
- i. It is strictly forbidden to import or export rhinoceros horn and tiger bone (including identifiable parts or medicine, crafts or other products). The transport, carrying or sending by post into or out of China are also prohibited. If the packaging of commodities refers to rhinoceros horn and tiger bone the commodities shall be treated as those containing rhinoceros horn and tiger bone without exception.
 - ii. Selling, purchasing, transporting, carrying and sending by post rhinoceros horn and tiger bone shall be prohibited. Owners of rhinoceros horn and tiger bone must register and seal these for safekeeping. The owner must make an accurate declaration to the competent provincial forestry authority or its designated unit. The provincial department must report the information to the State Office of Administration.
 - iii. Medicinal use / standards for rhinoceros horn and tiger bone shall be abolished (not to be used in making medicine).
 - iv. The state encourages the development and research relating to the substitution of rhinoceros horn and tiger bone in traditional medicine.

- v. Violation of the above is a criminal offence.
- e. *Prohibition on the consumption of all wild terrestrial animals, 2020* – The illegal trade of wildlife and the consumption of terrestrial wild animal of important ecological, scientific and social value that are under state protection as well as other terrestrial wild animals, including those bred and reared in captivity, are prohibited. The hunting, trading and transportation of terrestrial wild animals that naturally occur and breed in the wild for the purpose of consumption shall be prohibited.
- f. *Notification issued by NFGA* relating to the special action to address activities for captive-breeding of terrestrial wild animals such as tiger, 2024
 - i. Authorization of permits for the captive-breeding of terrestrial wild animals, such as tiger has been suspended;
 - ii. facilities to be inspected to determine the species bred, quantities, breeding records and pedigree archives, verify permits and documents and determine legality of the activities and sources of animals.
 - iii. Establishment of national and provincial databases and improved reporting system for terrestrial wild animals such as tigers (to be updated quarterly).
 - iv. Reporting of abnormal deaths to NFGA. Formulate and optimize paired breeding plans annually
 - v. Provincial forestry and grassland authorities are to summarize and report to NFGA before 31 October 2024.

Enforcement

2. China established an Inter-departmental CITES Enforcement Coordination Group, an Inter-ministerial Joint Meeting on Combating the Illegal Trade in Wildlife, and an Inter-departmental Joint Meeting for Online Market Supervision, at central and provincial levels. Organizational leadership is continually being strengthened while collaboration mechanisms are being improved and joint law enforcement through these mechanisms are promoted. The focus is on preventing and deterring the wildlife crime. Hotlines, emails, and online platforms were established to encourage the public to report the wildlife crimes and assist in investigating the illegal trade in wildlife.
3. Industry associations, NGOs, and relevant enterprises established the Internet Enterprise Alliance on Combating Illegal Online Trade in Wildlife and the Self-Discipline Alliance of Enterprises on Resisting Illegal Trade in Wildlife. This effort aims to form a united front to prevent illegal trade in wildlife.
4. The central and provincial forestry and grassland administration conducts unannounced and announced inspections of the facilities that keep tigers to verify quantities, breeding records and pedigree archives, permits and documents and determine legality of the activities and sources of animals.
5. The customs department are responsible to detect illegal shipments and the prosecutor's office (department) is responsible to prosecute cases involving smuggling of endangered species including tiger specimens.
6. General statistics relating to criminal cases were shared during the mission, including the following:
 - a. From 2017 to 2021 the courts concluded 16,662 criminal cases of endangering wild animal and plant resources in the first instance throughout the year (8,983 cases involving animals and 7,679 cases involving plants).
 - b. From 2017 to 2021 the procuratorate prosecuted a total of 13,839 cases and 22,380 people, and more than 7,000 public interest litigation cases related to biodiversity protection have been filed and handled.
 - c. With regards to smuggling, the following data from the Online China Judgements managed by the Supreme People's Court of China were shared: 366 cases of smuggling of endangered

animals and products between 2017 and 2021 with 535 defendants recorded. There seems to be decline in smuggling over time. The main species and specimens smuggled were elephant ivory and pangolin scales (>80% of smuggled items).

- d. Judgements: 148 defendants are on probation; 197 imprisoned (not more than 5 years); 148 imprisoned (5 – 10 years) and 42 imprisoned (>10 years).
- e. Since 2019, China (including mainland, Hong Kong SAR, and Macao SAR) reported in their annual illegal trade reports a total of 12 seizures involving tiger specimens (*Panthera tigris*) such as skin, skull, skeleton, teeth, bone, medicine.

LEGISLATIVE AND ENFORCEMENT MEASURES
IMPLEMENTED BY THE UNITED STATES OF AMERICA

Legislative provisions and implementation

Legislative provisions – Federal level

1. The tiger (*Panthera tigris*) is not a native species in the United States. Several legislative provisions at the federal, state and county level are used to regulate private ownership of and activities involving tigers and facilities keeping tigers in captivity. The Big Cat Public Safety Act (BCPSA), the Animal Welfare Act (AWA), the Endangered Species Act (ESA) and the Rhino and Tiger Conservation Act (RTCA) provide the basis, at a federal level, for the regulation, management and monitoring of facilities keeping big cats (tigers) and activities involving tigers (and other big cats) in the United States. These are discussed briefly in the following paragraphs. Additionally, the Lacey Act makes it unlawful to import, export, sell, acquire, or purchase wildlife that has been taken, possessed, transported, or sold in violation of United States or foreign law.
2. Inspections: United States Department of Agriculture (USDA) Animal Care (AC) personnel perform two major types of inspections: pre-licensing inspections and unannounced compliance inspections. In addition to routine inspections, USDA inspectors follow up on complaints from the public regarding regulated facilities, including reports that they are conducting regulated activity without an Animal Welfare Act license or registration. Furthermore, United States Fish and Wildlife Service (FWS) Office of Law Enforcement may inspect facilities if there are suspicions of violations of the ESA, CITES, etc.

a. *Animal Welfare Act of 1966 (AWA)*

The AWA is a federal law enforced by the USDA Animal and Plant Health Inspection Service (APHIS). The AWA requires all animal dealers¹ to be licensed as well as liable to monitoring by federal regulators and subject to enforcement action (that could include civil penalties, license suspension, license termination or license revocation) if they violate any provisions of the AWA.

Facilities that maintain and exhibit tigers must obtain a Class C license (exhibitor) from USDA and this license is valid for a three-year period.

APHIS issues licenses and conducts inspections of facilities (including zoos and sanctuaries) to ensure compliance with the minimum standards of care required by the AWA. Inspections are conducted by the APHIS officials using an internal risk-based system and are unannounced.

Facilities should inform APHIS of changes in the numbers of tigers housed at the facility and maintain detailed information relating to individual tigers must be kept by the facilities. Records must be provided during inspection of the facility by APHIS.

Breeding in Class C licensed facilities is not prohibited by the AWA.

Facilities that do not exhibit to the public and private owners of tigers are not required to be licensed under the AWA.

No legislative provisions are prescribed relating to the marking of individual specimens, information to be kept by facilities (registers) and regular submission of registers to USDA or disposal of carcasses of big cats.

- b. *Big Cat Public Safety Act of 2022 (BCPSA or Act)* – the resource implications associated with the implementation, monitoring and enforcement of the new legislation was not available at the time the report was finalized.

¹ *Animal Dealers—Anyone buying, selling, or trading animals that are non-native to the United States for research, teaching, testing, experimentation, or exhibition purposes, or as a pet, must be licensed, unless they fall under one of the exemptions.*

The BCPSA was enacted on 20 December 2022. It amends the Lacey Act Amendments of 1981 (16 U.S.C. 3371–3378) by amending and strengthening the provisions previously enacted under the Captive Wildlife Safety Act (CWSA). It placed new restrictions on the commerce, breeding, possession, and use of certain big cat species. In order to continue legally to possess pre-BCPSA privately owned big cats, the BCPSA required individuals or entities to register any big cat(s) that were in their possession before the date of enactment with the U.S. Fish and Wildlife Service (FWS), unless another exception of the BCPSA applies. The statute required that all privately owned pre-BCPSA big cats be registered with USFWS no later than June 18, 2023, which was 180 days after the date of enactment. The BCPSA also places restrictions on direct physical contact with big cats and prohibits the use of big cats, including cubs, for commercial photo-ops, petting, and similar activities.

The BCPSA refers to big cats as “prohibited wildlife species” which are defined as the following species and hybrids of any of these species: lion (*Panthera leo*), tiger (*Panthera tigris*), leopard (*Panthera pardus*), snow leopard (*Uncia uncia*), clouded leopard (*Neofelis nebulosa*), jaguar (*Panthera onca*), cheetah (*Acinonyx jubatus*), and cougar (*Puma concolor*).

The Act makes it unlawful for any person to:

- Import, export, transport, sell, receive, acquire, or purchase in interstate or foreign commerce, or in a manner substantially affecting interstate or foreign commerce; or
- Breed or possess;

any live prohibited wildlife species. The Act also makes it unlawful for any person to attempt to commit any of these acts with prohibited wildlife species.

The BCPSA provides the following exceptions to those prohibitions:

- An entity exhibiting animals to the public under a Class C license from the USDA, or a federal facility registered with the USDA that exhibits animals, if the entity or facility holds a license or registration in good standing and meets all the requirements of the Act for the exception.
- A state college, state university, state agency, or a state-licensed veterinarian.
- A qualifying wildlife sanctuary that cares for prohibited wildlife species and meets all the requirements of the Act for the exception.
- Qualifying transporters only when in custody of any big cat solely for the purpose of expeditiously transporting the big cat to a person who qualifies for an exception under the Act

The requirements to be met by a wildlife sanctuary that cares for prohibited wildlife species, are:

- (i) It is a corporation that is exempt from taxation;
- (ii) does not commercially trade in any prohibited wildlife species, including offspring, parts, and byproducts of such animals;
- (iii) does not breed any prohibited wildlife species;
- (iv) does not allow direct contact between the public and any prohibited wildlife species; and
- (v) does not allow the transportation and display of any prohibited wildlife species offsite.

Violators of the BCPSA are subject to civil or criminal penalties, or both (including potential fines, imprisonment, or both). Additionally, big cats bred, possessed, imported, exported, transported, sold, received, acquired, or purchased contrary to the provisions of the Act are subject to seizure and forfeiture.

For pre-BCPSA registered big cats, it is the responsibility of the owner / keeper of big cats to notify FWS of changes concerning the big cats, for example death, new physical location, changes to methods to prevent breeding, and changes to methods to prevent direct contact between the public and the registered big cat. Such changes must be reported within 10 calendar days of the change. In addition to

registering and updating the registration, the Act also requires that the owner / keeper of pre-BCPSA registered big cats:

- Does not breed, acquire, or sell any big cat after the date of the enactment of the Act (20 December 2022), regardless of whether the activity is intrastate, interstate, or international; and
- Does not allow direct contact between the public and any big cat after the Act's enactment date (20 December 2022).

The Act does not allow for pre-Act owners to acquire additional big cats after 20 December 2022. Only registered pre-Act big cats may be allowed to stay privately owned.

Most of the big cats are also listed as either endangered or threatened under the Endangered Species Act and take (harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct) of such species and their offspring is prohibited, with limited exceptions for take authorized by statute, regulation, or permit.

c. *Endangered Species Act of 1973 (ESA)*

The purposes of the ESA are to provide a means whereby the ecosystems upon which endangered species and threatened species depend may be conserved, to provide a program for the conservation of such endangered species and threatened species, and to take such steps as may be appropriate to achieve the purposes of the treaties and conventions, including CITES.

The ESA contains a full range of administrative, civil, permitting, and criminal enforcement mechanisms. A criminal violation of the ESA occurs when, among other things, a person or entity commits an unauthorized "take" of an endangered or threatened species. "Take" means, among other things, "harass," "harm," "wound," or "kill."

The tiger (*Panthera tigris*) is listed as Endangered under the ESA. All tigers wherever found are included in the species-level listing whether pure subspecies or inter-subspecific crossed (sometimes referred to as generic tigers). Among other provisions there are a number of general prohibitions that apply to all endangered wildlife, including tigers. These prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (which includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture or collect; or to attempt an of these) endangered wildlife within the United States. It is also illegal to possess, sell, deliver, carry, transport or ship any such wildlife that has been taken illegally. In addition, it is illegal for any person subject to the jurisdiction of the United States to import; export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever and in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any listed species. It is also unlawful to attempt to commit, solicit another to commit or cause to be committed any of these ESA offences. Exceptions apply to employees of certain government agencies and a permit may be issued to carry out otherwise prohibited activities involving endangered wildlife under certain limited circumstances, including to enhance the propagation or survival of the species in the wild.

d. *Rhino and Tiger Conservation Act (RTCA)*

The Rhino and Tiger Conservation Act prohibits the sale, importation, exportation, or attempts to sell, import, or export, any product, item, or substance intended for human consumption or application, containing, or labeled or advertised as containing, any substance derived from any species of rhinoceros or tiger. Criminal and civil penalties for violating this law are included. The RTCA sets prohibitions on items labeled or advertised as containing rhino or tiger products, even if the presence of rhino and tiger ingredients cannot be verified scientifically. These prohibitions are intended to reduce the promotion of these ingredients in consumer products, thereby decreasing consumer demand and potentially benefitting the species in the wild. The intent is to reduce poaching and the illegal trade of rhino and tiger parts by eliminating markets for these products. The RTPLA addresses the demand side of the illegal wildlife trade, seeking to protect these species by disrupting the economic incentives for poachers and traffickers.

e. *Captive Wildlife Safety Act (CWSA) (Note: The BCPSA amended and updates the CWSA)*

The CWSA complements other U.S. wildlife conservation and animal welfare laws, such as the ESA, the AWA, BCPSA, by providing an additional layer of protection specifically targeting the trade and

exploitation of big cats, including tigers.

Legislative provisions – State level

3. The facilities keeping big cats visited were in Arkansas and Texas, and both facilities advised that they comply with state specific legislative provisions. The facility in Texas also indicated that county specific provisions are also applicable. These statements were confirmed by APHIS and FWS personnel accompanying the mission.

- a. *Arkansas*

The [Arkansas Code Book](#), adopted by the Arkansas Game and Fish Commission (Commission), the state's wildlife conservation agency charged with the development and enforcement of captive wildlife regulations in the state, regulates the ownership and possession of large carnivores. The term 'large carnivore' is defined as: Mountain Lion (*Puma concolor*), Tigers (*Panthera tigris*), African Lions (*Panthera leo*), or any hybrid thereof, and all species of bears (family Ursidae). In terms of this code, it is unlawful to possess tigers, African lions, and all species of bears not in compliance with the legislative provisions in place in Arkansas (Ark. Code Ann. §§ 20-19-501 through 20-19-511 or Code 09.07.). It is furthermore unlawful to rear, breed, propagate, produce, distribute, sell, or offer for sale any wildlife in Arkansas without first obtaining a valid Wildlife Breeder/Dealer Permit from the Commission. According to the code, a person may possess a large carnivore only if they were in possession of the large carnivore on or before 12 August 2005 and the person applied for and was granted a permit for personal possession for each large carnivore not more than 180 days after that date. Except for these grandfathered possessors and other entities (zoos, USDA permittees, veterinary hospitals), it is illegal for anyone to own, possess, breed, or transfer ownership of a large carnivore.

Large carnivores may be imported only by holders of valid USDA Wildlife Exhibition Permits for large carnivores or mountain lions. Such importation must be done in compliance with a current Commission Wildlife Importation Permit.

A wildlife breeder / dealer permit must be obtained by facilities keeping tigers. The Arkansas code contains restrictions relating to the new facilities. B.4 of the Arkansas code states that a permit will be denied if "The applicant is seeking to permit a new facility for the rearing, breeding, propagating, or distributing of large carnivores, mountain lions, or any member of the Cervidae family".

The Code does set out specific requirements for the keeping of large carnivores (in existing facilities) including enclosure specifications and the requirements for a written plan of action for use in events such as severe damage to enclosures from fire, wind, floods or other natural forces; animals attacking and/or injuring humans, and animals escaping enclosures. The plan should include a list of safety equipment that must be available for use. The Commission must immediately be notified upon the escape of any large carnivores or mountain lions. In the event of sickness, the name, address, phone number, and signature of the veterinarian who has agreed to care for the animal shall be provided.

- b. *Texas*

In Texas, owners of dangerous animals are required to register their dangerous animals with local health authorities and submit a copy of the registration to the Department of State Health Services.

Dangerous animals include tigers and any hybrid of an animal listed in the definition (i.e., tiger hybrids): The APHIS Inspection Guide states that dangerous animals include: lions, tigers, wolves, bear, elephants, others per AC; potentially dangerous include large felid, bears, wolves, rhinoceros, elephants, others per AC

The [Health and Safety Code includes regulations for animals](#) that address among others the keeping of tigers. The following key provisions are most relevant:

- A person may not own, harbor, or have custody or control of a dangerous wild animal for any purpose unless the person holds a certificate of registration for that animal issued by an animal registration agency.
- A certificate of registration issued is not transferrable and is valid for one year after its date of issuance or renewal unless revoked.

- The animal registration agency (defined in Texas statute as the municipal or county animal control office with authority over the area where a dangerous wild animal is kept or a county sheriff in an area that does not have an animal control office) may establish and charge reasonable fees for application, issuance, and renewal of a certificate of registration in order to recover the costs associated with the administration and enforcement of this subchapter. The fee charged to an applicant may not exceed \$50 for each animal registered and may not exceed \$500 for each person registering animals, regardless of the number of animals owned by the person. The fees collected under this section may be used only to administer and enforce the provisions in the code.
- The application must include among others:
 - a complete identification of each animal, including species, sex, age, if known, and any distinguishing marks or coloration that would aid in the identification of the animal;
 - the exact location where each animal is to be kept;
 - a color photograph of each animal being registered taken not earlier than the 30th day before the date the application is filed;
 - a photograph and a statement of the dimensions of the primary enclosure in which each animal is to be kept and a scale diagram of the premises where each animal will be kept, including the location of any perimeter fencing and any residence on the premises; and
 - if an applicant holds a Class "A" or Class "B" dealer's license or Class "C" exhibitor's license issued by the Secretary of Agriculture of the United States under the Animal Welfare Act, a clear and legible photocopy of the license.

There are certain exemptions from the provisions in the code for facilities registered with USDA or facilities accredited by the Association of Zoos and Aquariums.

Inspections are conducted by the animal registration agency or a designated licensed veterinarian. The inspection includes an inspection of the animal, the primary enclosure for the animal, and the owner's records relating to the animal to ensure compliance with the provisions in the code.

In terms of the code, an owner of a dangerous wild animal may not permanently relocate the animal unless the owner first notifies the animal registration agency in writing of the exact location to which the animal will be relocated and provides the animal registration agency with information regarding the new location and other information as set out in the code.

The code furthermore requires that the owner must, within 10 days after the death, sale, or other disposition of the animal, notify the animal registration agency in writing of the death, sale, or other disposition.

No provisions relating to disposal of the carcass are included in the code.

Enforcement

4. **The Animal and Plant Health Inspection Service (APHIS)**, a program within the USDA, is responsible for enforcing the AWA. This includes regulating the treatment of animals in research, exhibition, transport, and by dealers. APHIS inspectors monitor compliance with the AWA standards in various facilities, such as zoos, breeding operations, and research laboratories, to ensure that animals are provided humane care and treatment.
5. **U.S. Customs and Border Protection (CBP)** officers at U.S. ports of entry inspect imports and exports, intercepting illegal wildlife specimens and enforcing regulations set forth by the Lacey Act, the ESA, and other wildlife protection laws in coordination with the FWS and other agencies.
6. **The Department of Justice (DOJ)**, through its Environment and Natural Resources Division (ENRD), is responsible for prosecuting individuals and organizations that violate federal wildlife laws, including those protecting big cats. DOJ may bring legal action against perpetrators of wildlife crimes, seeking penalties that include fines, restitution, and imprisonment.

7. **The Federal Bureau of Investigation (FBI)** has jurisdiction over federal crimes and may investigate crimes involving illegal trade and smuggling of big cats. This includes cases that cross state lines or involve international trafficking, where their expertise in criminal investigation can uncover complex smuggling rings and operations. FBI often works in collaboration with other federal agencies, providing investigative support in cases involving wildlife crimes. Their involvement is particularly crucial in operations requiring sophisticated investigative techniques, including undercover operations and surveillance.
8. **The US Fish and Wildlife Service**, part of the Department of the Interior, is responsible for enforcing CITES in the United States, the Endangered Species Act, the Rhino and Tiger Conservation Act, the Captive Wildlife Safety Act, the Big Cat Public Safety Act and the Lacey Act. It is responsible for the protection, conservation, and recovery of endangered and threatened species and their habitats.
9. The US Fish and Wildlife Service's Office of Law Enforcement (OLE) plays a crucial role in combating the illegal trade of endangered species, including tigers and other big cats. OLE is composed of special agents, wildlife inspectors, intelligence analysts, forensic scientists, information technology specialists, and support staff who investigate wildlife crimes, regulate the wildlife trade, develop outreach to help the public understand and obey wildlife protections laws, and work in partnership with international, federal, state, local, and Tribal counterparts to conserve wildlife resources. OLE coordinates closely with other agencies such as CBP, FBI, and DOJ to enforce wildlife laws and regulations. It performs inspections of wildlife imports and exports at ports of entry, utilizing detection technologies and canine units to uncover illegal shipments of big cats or their parts. Through vigorous investigations and the use of undercover techniques and sting operations, OLE has been successful in bringing forward cases involving the illegal big cat trade. The following link includes some examples on enforcement actions related to big cat facilities in the United States:
 - <https://www.justice.gov/usao-wdok/pr/joe-exotic-sentenced-22-years-murder-hire-and-violating-lacey-act-and-endangered>
 - <https://www.justice.gov/opa/pr/doc-antle-owner-myrtle-beach-safari-pleads-guilty-federal-wildlife-trafficking-and-money>
 - <https://www.justice.gov/opa/pr/us-government-seizes-68-protected-big-cats-and-jaguar-jeffrey-and-lauren-low>