

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

Species conservation and trade

Fauna

Pangolins (*Manis* spp.)

REPORT OF THE SECRETARIAT

1. This document has been prepared by the Secretariat.
2. At its 19th meeting (CoP19; Panama City, 2022), the Conference of the Parties adopted Decisions 18.238, 18.239 and 19.200 to 19.204 on *Pangolins* (*Manis* spp.), as follows:

***Directed to all pangolin range States***

**18.238** *All pangolin range States that have not yet done so, are encouraged to take urgent steps to develop and implement in situ pangolin management and conservation programmes, which includes population assessments, as anticipated in paragraph 7 of Resolution Conf. 17.10 (Rev. CoP19) on Conservation of and trade in pangolins, and report on the implementation of this Decision to the Secretariat.*

***Directed to the Secretariat***

**18.239** *The Secretariat shall, subject to external funding, work with the Species Survival Commission Pangolin Specialist Group of the International Union for Conservation of Nature (IUCN) and other relevant experts and in collaboration with the pangolin range States to develop conversion parameters for all pangolin species, that will enable the reliable determination of the number of animals associated with any quantity of pangolin scales seized, that can be used by Parties in cases where national legislation demands that such information be provided for court purposes.*

***Directed to the Animals Committee***

**19.200** *The Animals Committee shall:*

- a) *review the conversion parameters for all pangolin species, developed in accordance with the provisions of Decision 18.239, to enable the reliable determination of the number of animals associated with any quantity of pangolin scales seized, and that can be used by Parties in cases where national legislation demands that such information be provided for law enforcement and court purposes;*
- b) *review existing identification materials concerning pangolin species, their parts and derivatives, and consider the need for new or additional materials to be developed, including to support the identification of seized pangolin specimens at species level;*
- c) *review any information brought to its attention by the Secretariat in accordance with Decision 19.203, paragraphs b) and e); and*

- d) *make recommendations, as appropriate, to the Standing Committee and the Secretariat.*

**Directed to Parties**

**19.201** *All Parties are strongly encouraged to identify seized pangolin specimens at species level and report the seizures at species level in their annual illegal trade reports.*

**Directed to Parties in whose territories stocks of parts and derivatives of pangolins exist**

**19.202** *Parties in whose territories stocks of parts and derivatives of pangolins exist are encouraged to take urgent steps to establish and apply, where not yet done, strict control measures to secure these stocks, as called for in paragraph 3 of Resolution Conf. 17.10 (Rev. CoP19) on Conservation of and trade in pangolins and report on the implementation of this Decision to the Secretariat.*

**Directed to the Secretariat**

**19.203** *The Secretariat shall:*

- a) *issue a Notification inviting Parties, international organizations, international aid agencies and non-governmental organizations that developed tools and materials that could assist Parties in the implementation of Resolution Conf. 17.10 (Rev. CoP19) or identification materials concerning pangolin species, their parts and derivatives, to bring such materials to the attention of the Secretariat;*
- b) *bring any materials reported in accordance with paragraph a) of the present Decision to the attention of the Animals Committee or the Standing Committee, as appropriate, together with any recommendations it may have, and taking into account any subsequent recommendations from the Animals Committee or the Standing Committee, make such materials available to the Parties;*
- c) *subject to external funding, provide training to Parties on the identification of pangolin specimens;*
- d) *work with its partners in the International Consortium on Combating Wildlife Crime (ICWC) to initiate activities and support the efforts of Parties to address illegal trade in Pangolin specimens;*
- e) *report on the implementation of Decisions 18.238 and 18.239 to the Animals Committee, together with any recommendations it may have;*
- f) *report on the implementation of Decision 19.202 to the Standing Committee, together with any recommendations it may have; and*
- g) *report to the 20th meeting of the Conference of the Parties on the implementation of the present Decision.*

**Directed to the Standing Committee**

**19.204** *The Standing Committee shall:*

- a) *consider the report and any recommendations of the Animals Committee in accordance with Decision 19.200, paragraph d), and of the Secretariat in accordance with Decision 19.203, paragraphs b) and f), and make recommendations to the Parties or the Secretariat as appropriate;*
- b) *review the information contained in documents SC69 Doc. 57 Annex 2, SC74 Doc. 73 Annex 2, reports from Parties under Resolution Conf. 17.10 (Rev. CoP19), and other relevant resources to develop time-bound and measurable recommendations for Parties (range, transit, and consumer countries) at SC78 that support addressing the illegal trade in pangolins; and*
- c) *report the results of its work together with any recommendations it may have to the 20th meeting of the Conference of the Parties.*

#### Implementation of Decision 19.203, paragraph f)

3. The Secretariat issued [Notification to the Parties No. 2024/096](#) on 3 September 2024, inviting Parties to report on their implementation of Decision 19.202 and highlighting paragraph 3 of Resolution Conf. 17.10 (Rev. CoP19), which is directly relevant to the Decision. The Secretariat also reminded Parties that paragraph 4 of Resolution Conf. 17.10 (Rev. CoP19) urges Parties to annually submit reports to the Secretariat containing information that could help to better understand matters affecting pangolins, including *inter alia* markets, seizures, legal and illegal trade and breeding operations. The Secretariat received responses from Angola, Cambodia, Cameroon, Indonesia, Japan, Mexico, Namibia, Sweden, Thailand, the United Kingdom of Great Britain and Northern Ireland, and the United States of America.
4. Parties' responses are summarized in paragraphs 5 to 16 of the present document. The Secretariat notes that these responses will be further analysed to inform the Secretariat's report to the 20th meeting of the Conference of the Parties in accordance with paragraph 13 a) in Resolution Conf. 17.10 (Rev. CoP19).

#### Implementation of Decision 19.202

5. In response to Notification to the Parties No. 2024/096, nine Parties—Angola, Cambodia, Cameroon, Japan, Mexico, Namibia, Sweden, Thailand, and the United States of America—reported that stocks of pangolin specimens exist in their territories.
6. Angola, Cameroon, Indonesia, Japan, Mexico, Sweden, Thailand, the United Kingdom of Great Britain and Northern Ireland, and the United States of America reported on their control measures in place to secure and monitor stocks of parts and derivatives of pangolins, as further described in paragraphs 7 to 14 below. Such measures include, for example, regulatory frameworks, inventory management systems, and/or collaboration protocols with customs and other relevant authorities or organizations. Cambodia and Namibia reported having stocks of pangolin specimens but did not provide information on the measures in place to control and secure these stocks.

#### *Control measures in place to secure and monitor stocks of parts and derivatives of pangolins*

7. Angola highlighted that its measures to protect, monitor, manage, store and dispose of wildlife specimens, including pangolins, are outlined in Presidential Decree 311/18. According to Angola's legislation, live and healthy seized animals must be immediately returned to their natural habitat, if possible, whereas dead animals should be buried or incinerated. Angola reported that it has not yet discarded any pangolin scales and that it collaborated with the Elephant Protection Initiative to implement Standard Operating Procedures, establishing secure storage for seized products. Additionally, Angola organized a workshop to refine its disposal regulations.
8. Cameroon reported on the implementation of an Inventory Management System to ensure transparent management of stockpiled wildlife specimens, including pangolin specimens.
9. Japan highlighted implementing measures in accordance with Article VIII 4(b) of the Convention in cooperation with customs and related organizations but did not include specific details on how it manages pangolin stockpiles.
10. Mexico reported that its national legislation on conservation and sustainable use of wildlife includes provisions relevant to pangolins under the General Wildlife Law but did not include specific details on how pangolin stockpiles are managed. Mexico indicated that data concerning public or private, scientific and museum collections of dead specimens of wild species must annually be registered and updated by informing the relevant authority. For live specimens, a management plan is required, which must contain information on the species, the number of specimens, and the type of marking of the specimens by species, among other details.
11. Sweden reported that there are no live pangolins within the country, and that all stockpiled pangolin specimens are securely stored in facilities with strict access controls. These measures apply to specimens kept in storage facilities, as well as those displayed in exhibitions.
12. Thailand indicated that its Department of National Parks, Wildlife, and Plant Conservation (DNP) enforces Regulation B.E. 2565 (2022) under the Wild Animal Reservation and Protection Act (WARPA) of 2019, covering the management of protected wildlife, including pangolins. This Regulation specifies procedures for care and handling of live pangolins that are seized, abandoned, or surrendered, ensuring that they receive

proper health evaluations, are marked, and registered. If conditions permit, these pangolins may be rehabilitated and released back into their natural habitat, or otherwise, they may be kept in captivity for research, education, or conservation purposes. For pangolin parts and derivatives, such as scales, the Regulation outlines disposal options like government use, educational purposes, or destruction, with strict protocols for storage as evidence and detailed documentation of the destruction process, requiring authorization and witness presence. Thailand further reported that, as CITES-listed species, pangolins are considered restricted goods under the Customs Act, which dictates their disposal in accordance with this legislation. For pangolin specimens that have been seized the options for disposal are limited to transferring them to a government agency, typically the DNP, or destroying them, due to the WARPA and CITES provisions. Destruction of pangolin specimens is warranted under conditions where they are damaged, deteriorated, or depreciated to an extent where their value does not justify the costs of storage. In such cases, the agency holding the specimens must propose their destruction to the Director-General of DNP or an appointed representative for approval.

13. The United Kingdom of Great Britain and Northern Ireland reported that seizures of live pangolins at its borders are managed according to its Border Force standard operating procedures for the housing and disposal of live CITES specimens. For specimens, seized items are assessed for potential health risks and disposed of according to the animal product health regulations in force. Specimens seized at the border can be disposed of after 30 days to avoid indefinite storage, which is the regular practice rather than stockpiling. Meat or carcasses are typically disposed of almost immediately, unless required for species identification in ongoing investigations involving commercial quantities. All data regarding seizures at the border involving CITES-listed species is recorded in a national Border Force database. Seizures of live animals made by the police are managed through housing and re-homing arrangements with Border Force authorities at Heathrow Airport, while parts or derivatives seized by the police are kept under their control pending court proceedings or until they are disposed of and sent to recognized establishments for educational or scientific use, in line with police service policies.
14. The United States of America highlighted that its Fish and Wildlife Service (USFWS), National Wildlife Property Repository, operates under standard collection and management guidelines which provides for procedures to secure, monitor, manage, store, and dispose of wildlife specimens, including pangolin specimens. No other special provisions are applied to pangolin specimens. In accordance with USFWS regulation 50 CFR Part 12 on Seizure and Forfeiture Procedures, prompt destruction occurs regarding any seized pangolin specimens that are not needed for *bona fide* scientific, educational, enforcement, or identification purposes.

#### *Disposal of pangolin stocks*

15. Regarding disposal of pangolin stocks in the period since 2 January 2017, Cambodia reported destruction of 21.9 kg of pangolin specimens and 2 pangolin bodies. Nigeria reported that it incinerated 3,914.08 kg of pangolin scales on 16 October 2023. Thailand reported that its Department of Customs destroyed 21 kg of pangolin scales in 2024.

#### *Reporting on pangolin stockpiles*

16. The Secretariat proposes aligning reporting on pangolin stockpiles with reporting on ivory and rhinoceros' horn stockpiles, as in Resolution Conf. 10.10 (Rev. CoP19) on *Trade in elephant specimens* and Resolution Conf. 9.14 (Rev. CoP19) on *Conservation of and trade in African and Asian rhinoceroses*. The Secretariat therefore proposes amending paragraphs 3 and 13 a) of Resolution Conf. 17.10 (Rev. CoP19) on *Conservation of and trade in pangolins*. These amendments are presented in the Annex to the present document.

#### *Additional information*

17. In addition, information related to pangolin stocks can be found in documents SC78 Doc. 33.5 on the *Application of Article XIII in the Democratic Republic of the Congo* and SC78 Doc. 33.9 on the *Application of Article XIII in Nigeria*. The Democratic Republic of the Congo reported that stocks of pangolin scales and ivory are strictly managed and protected using a modern computerized system and camera surveillance.

#### Implementation of Decision 19.204, paragraph b)

18. Decision 19.204, paragraph b), directs the Standing Committee to review the information contained in documents [SC69 Doc. 57 Annex 2](#), [SC74 Doc.73 Annex 2](#), reports from Parties under Resolution

Conf. 17.10 (Rev. CoP19), and information from other relevant sources to develop time-bound and measurable recommendations that support addressing illegal trade in pangolins.

19. In document SC69 Doc. 57 on *Pangolins (Manis spp.)*, the Secretariat included a report on illegal trade in pangolins it had prepared in collaboration with the International Union for Conservation of Nature (IUCN). The brief summary of the reports is as follows:

- Significant levels of illegal trade in pangolin specimens were noted, with data from 1999 to 2017 showing a total of 1,557 seizures estimated to represent approximately 192,576 pangolins. This illegal trade was particularly evident from 2007 onward.
- Illegal trade pangolin specimens affected 55 countries<sup>1</sup>, including African and Asian range States and non-range States, and all eight recognized pangolin species. Most of the illegal trade involved pangolin scales (48%) and live or dead pangolins (48%), with less illegal trade in meat (4%) and other derivatives (< 1%) by volume. Most of this trade (64%, an estimated 58,484 pangolins) involved *Manis spp.*, as most seizure reports failed to specify the species involved.
- Trade routes were multifaceted, spanning Africa, Asia, the Americas, Europe, and Oceania, exploring the dynamics of this illegal trade by geographic region in the report. The biggest trend was the intercontinental trafficking of pangolin scales from Africa to Asian markets.
- Several large-scale seizures of scales occurred between 2014 and 2017, involving scales from an estimated 86,000 pangolins. Notable incidents included the seizure of more than three tons of scales in Hong Kong SAR of China, in two shipping containers from Uganda in 2014; 12.3 tons of scales from Nigeria in three shipments—with two shipments seized in Hong Kong SAR of China (two tons in 2015 and 7.2 tons in 2017) and one shipment seized by authorities in mainland China (3.1 tons in 2016); and the seizure of four tons of scales in Hong Kong SAR of China in 2016, that had originated from Cameroon. Additionally, 712 kg of scales were seized in Malaysia, arriving in two shipments, one from Ghana and the second from the Democratic Republic of the Congo. In 2017, three tons of pangolin scales were seized in Côte d'Ivoire, which open-source information suggested originated from Côte d'Ivoire, Burkina Faso, and Liberia, and five tons of scales were seized in Malaysia, believed to have originated from Nigeria.

20. In document SC74 Doc.73 on *Pangolins (Manis spp.)*, the Secretariat included a report on illegal trade in pangolin specimens it had prepared in collaboration with IUCN based on analyses of illegal trade data covering the period from 2016 to 2020, as reported by Parties in their Annual Illegal Trade Reports. This data documented 955 seizures involving pangolin specimens across 33 countries<sup>2</sup>, estimated to represent about 259,000 pangolins. About 98% of the seized volume comprised scales, with 20 significant seizures in Côte d'Ivoire, Malaysia, Singapore, Thailand, and Viet Nam between 2017 and 2019 accounting for 95% of all scales seized. The alleged origins of these scales were Cameroon, Congo, the Democratic Republic of the Congo, Mozambique and Nigeria. Transit countries included Malaysia, Singapore, and Thailand, with China, the Lao People's Democratic Republic, and Viet Nam identified as the most likely countries as final destinations. Based on additional data from other sources, the actual volume of illegal trade in pangolins might have been significantly higher, potentially involving up to approximately 600,000 pangolins between 2016 and 2019 and potentially close to a million over the last decades, including all eight pangolin species.

21. More recently, the [2024 World Wildlife Crime Report](#) published by the United Nations Office on Drugs and Crime detailed a significant increase in pangolin scale seizures after 2014, and indicated the emergence of mixed pangolin and ivory shipments. Seizures of pangolin scales peaked in 2019, with Singapore making record-breaking large-scale seizures. However, global seizure volumes declined sharply in 2020, likely due to the COVID-19 pandemic, although local seizure incidents in some countries increased. By 2021, seizure volumes showed a partial rebound although they remained below the 2019 level. The report identified Nigeria

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<sup>1</sup> Belgium, Benin, Cambodia, Cameroon, Central African Republic, China (including Hong Kong Special Administrative Region of China), Congo, Côte d'Ivoire, Democratic Republic of the Congo, Equatorial Guinea, Ethiopia, France, Gabon, Ghana, Germany, Guinea, India, Indonesia, Japan, Italy, Kenya, Lao People's Democratic Republic, Liberia, Lichtenstein, Malaysia, Malta, Mexico, Morocco, Myanmar, Namibia, the Netherlands, Nepal, New Zealand, Nigeria, Norway, Pakistan, the Philippines, Qatar, Sierra Leone, Singapore, Spain, South Africa, Sudan, Switzerland, Thailand, Togo, Turkey, Uganda, United Arab Emirates, United Kingdom of Great Britain and Northern Ireland, United Republic of Tanzania, United States of America, Viet Nam, Zambia and Zimbabwe.

<sup>2</sup> Bangladesh, Belgium, Botswana, Côte d'Ivoire, Czech Republic, Democratic Republic of the Congo, France, Germany, India, Indonesia, Japan, Lao People's Democratic Republic, Malawi, Malaysia, Mozambique, Myanmar, Namibia, Nepal, Netherlands, New Zealand, Nigeria, Pakistan, Philippines, Poland, Singapore, South Africa, Spain, Switzerland, Thailand, United Kingdom of Great Britain and Northern Ireland, United States of America, Viet Nam and Zimbabwe

as a central hub, with over 190 tons of scales seized elsewhere between 2010 and 2021 linked to the country, suggesting that sourcing extended to pangolins from Cameroon and the Democratic Republic of the Congo. According to the report, mainland China and Hong Kong SAR of China were the primary destinations for shipments, with Viet Nam emerging as a secondary destination point after 2019.

22. Documents SC78 Doc. 33.5 on *Application of Article XIII in the Democratic Republic of the Congo* and SC78 Doc. 33.9 on *Application of Article XIII in Nigeria* provide information on enforcement measures taken by these Parties respectively to respond to and address illegal trade in pangolins. The Secretariat notes that, according to open-source reports, the Nigeria Customs Service continues to make large-scale seizures of pangolin scales in the country. Reports indicate that, in December 2024, more than 2 tons of pangolin scales were seized. It is however also encouraging to note that these illegal consignments seem to be increasingly detected within Nigeria rather than elsewhere, suggesting that strengthened enforcement measures and activities in the country are delivering results.
23. At the 33rd meeting of the Animals Committee (AC33; Geneva, July 2024), China submitted information document [AC33 Inf. 17](#) regarding *Conservation measures and effectiveness in China on pangolins*. China also submitted to the present meeting an information document related to agenda item 67 on pangolins. In this document, China elaborates on how it has strengthened its protection and management requirements regarding pangolins. On 13 November 2024, the National Forestry and Grassland Administration, State Administration of Traditional Chinese Medicine, and State Drug Administration issued a "Notice on Effectively Strengthening the Protection and Management of Pangolins". This notice reiterates prohibitions on hunting of pangolins, commercial import and export of pangolins and their products, and commercial use of confiscated pangolins and their products. It also emphasizes deploying inventory verification of pangolins and their products; cracking down on illegal and criminal activities involving pangolins; promoting measures to gradually reduce the use of pangolin-based medicine and expanding the effectiveness of pangolin conservation efforts.

#### Implementation of Decisions 18.238, 18.239, 19.200 and 19.203, paragraphs a), b) and e)

24. Reporting on the implementation of Decisions 18.238, 18.239, 19.200 and 19.203, paragraphs a), b) and e) is addressed in the report of the Animals Committee as presented in document [SC78 Doc. 67.1](#).

#### Conclusions

25. As outlined in paragraphs 5 through 15 above, Decisions 19.202 and 19.203, paragraph f), have been implemented. Considering that the provisions of Decision 19.202 are already reflected in paragraph 3 of Resolution Conf. 17.10 (Rev. CoP19), the Secretariat proposes that the Committee recommend to CoP20 that Decisions 19.202 and 19.203, paragraph f) be deleted.
26. As noted in document SC78 Doc. 67.1, the matter of *in situ* pangolin management and conservation programmes is already reflected in paragraph 10 of Resolution Conf. 17.10 (Rev. CoP19). Considering this and draft Decision 20.CC proposed in the Annex to document SC78 Doc. 67.1, the Secretariat proposes that the Committee recommend the deletion of Decision 18.238 to CoP20. Further, as noted in document SC78 Doc. 67.1, at AC33, the Animals Committee agreed that deletion of Decision 18.239 can be proposed to CoP20 as it has been implemented. Reporting provided in document SC78 Doc. 67.1 also addresses the implementation of Decisions 19.200 and 19.203, paragraphs a), b), and e) and these Decisions can also be proposed for deletion as they have been implemented.
27. In light of the ongoing preparation of a comprehensive report on pangolins for CoP20 in accordance with paragraph 13 a) of Resolution Conf. 17.10 (Rev. CoP19), the Committee may also consider recommending that the Secretariat develop time-bound and measurable recommendations for Parties (range, transit, and consumer countries), as appropriate, for consideration at CoP20. This approach would allow drawing upon the most recent data and allow Parties to have more information available when making decisions aimed at addressing illegal trade in pangolins.

#### Recommendations

28. The Standing Committee is invited to:
  - a) note the responses to Notification to the Parties No. 2024/096;

- b) request the Secretariat, in its implementation of paragraph 13 of Resolution Conf. 17.10 (Rev. CoP19), to develop recommendations based on the most updated information available, directed to Parties (range, transit, and consumer countries), as appropriate, for consideration at CoP20;
- c) consider and agree for onward submission to CoP20, the proposed amendments to paragraphs 3 and 13. a) in Resolution Conf. 17.10 (Rev. CoP19) on *Conservation of and trade in pangolins*, as presented in the Annex to the present document; and
- d) recommend to CoP20:
  - i) the deletion of Decisions 18.238 and 19.202, as the matter of *in situ* pangolin management and conservation programmes and stocks of pangolins specimens are already reflected in paragraphs 3 and 10 of Resolution Conf. 17.10 (Rev. CoP19) on *Conservation of and trade in pangolins*; and
  - ii) the deletion of Decisions 18.239, 19.200 and 19.203, paragraphs a), b), e) and f), as they have been implemented.

DRAFT AMENDMENTS TO RESOLUTION CONF. 17. 10 (REV. COP19)  
ON CONSERVATION OF AND TRADE IN PANGOLINS

New text is underlined and deleted text is in ~~strike~~through.

3. ENCOURAGES Parties on whose territories stocks of parts and derivatives of pangolins exist, to take urgent steps to establish and apply, where not yet done, strict control measures to secure and monitor these stocks, and inform the Secretariat of the level of stocks each year before 28 February, in a format to be defined by the Secretariat, indicating the type and ~~number~~ quantity of specimens, the species, the source of the specimens, management measures, and the reasons for any significant changes in the stockpile compared to the preceding year;

[...]

13. INSTRUCTS the Secretariat to:

- a) prior to each meeting of the Conference of the Parties, and pending external funding, prepare a report in consultation with the pangolin range States and Parties affected by illegal trade in pangolins, on the conservation status of pangolins in the wild, ~~and trade controls~~ measures put in place by ~~in~~ Parties, ~~using information provided by the range States on measures taken to comply with this Resolution and related relevant Decisions and~~ to use an aggregated summary of the pangolin stock declarations of Parties and any other relevant additional information provided by relevant Parties to inform the report; and