

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

PANGOLIN CONSERVATION – AN UPDATE ON U.S. ACTIONS

1. This document has been submitted by the United States of America* in relation to agenda items SC78 Docs. 67.1 and 67.2 on Pangolins (*Manis* spp.).
2. The United States is providing an update to the CITES Parties about progress on our commitments to advance pangolin conservation. The United States made seven commitments at the 33rd meeting of the CITES Animals Committee (AC33, [AC33 Inf. Doc. 23](#)) to strengthen efforts alongside international partners to help pangolin populations rebound. We urge other Parties to similarly take action to ensure long-term protection of these imperiled species.
3. CITES protections are in place for pangolins, yet these species are widely labeled as the “most heavily trafficked mammal in the world.”¹ All eight pangolin species are at risk of extinction, with trafficking as a primary threat. At CoP17, the Parties uplisted pangolins to CITES Appendix I, which took effect on January 2, 2017. The Parties took further action at the 19th meeting of the Conference of the Parties (CoP19) by revising [Resolution Conf. 17.10 \(Rev. CoP19\) on Conservation of and trade in pangolins](#).
4. To prevent extinction of pangolins, Parties must take immediate action to effectively implement CITES provisions. We especially encourage Parties to fully implement CITES Resolution Conf. 17.10 (Rev. CoP19).
5. The United States views pangolin conservation as a priority under CITES efforts, and we are taking steps to reduce the overexploitation of pangolins and save these species from extinction. To encourage more global action, the U.S. made seven commitments for pangolin conservation in July 2024. By the end of 2026, the United States plans to take the following steps, and we provide a progress update for each effort below:

(i) Issue a guidance document for U.S. state-level wildlife enforcement agencies to increase awareness of “use after import” requirements for CITES Appendix-I specimens, including pangolin specimens.

Progress to date: The U.S. Fish and Wildlife Service (USFWS) has provided a [fact sheet](#) on the USFWS website summarizing the U.S. CITES implementing regulations ([50 CFR § 23.55](#)) that outline restrictions on “use after import” for CITES Appendix-I specimens within the United States. This was posted online on Dec. 12, 2024.

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

¹ *Challender D., Waterman C., Baillie J. (2014) Scaling up pangolin conservation. IUCN SSC Pangolin Specialist Group Conservation Action Plan, Zoological Society of London, London*

(ii) Publish the last 10 years of U.S. imports/exports and seizures of pangolin specimens on a publicly available website.

Progress to date: The U.S. Fish and Wildlife Service's Office of Law Enforcement (OLE) posted a 10-year dataset online on Nov. 4, 2024, at: [pangolins_2013-2023.xlsx | FWS.gov](#) . The dataset includes all U.S. imports and exports of pangolin specimens from Jan. 1, 2013 through Dec. 31, 2023, using OLE's Law Enforcement Management Information System database. These data include cleared, refused, and seized shipments.

(iii) Provide information to the CITES Secretariat, in line with CITES Resolution Conf. 17.10 (Rev. CoP19) on *Conservation of and trade in pangolins*, on stocks of pangolin specimens held by the U.S. government, with reports including information on annual levels and trends in stockpiles, number, species, and sources of specimens, management measures, and the reasons for any significant annual changes in the stockpile levels.

Progress to date: The United States provided information on U.S.-held stocks of pangolin specimens to the CITES Secretariat in its October 23, 2024 response to the Notification to the Parties 2024/096, and again with an amended response sent on November 26, 2024. Stock information included type of specimen, quantity, and sources of specimen. In summary, the U.S. Government (USG) holds relatively few pangolin specimens, in part because OLE has a routine procedure of documenting and then destroying seized pangolin specimens, except in rare circumstances when they are retained for scientific, educational, enforcement, or identification purposes. Current pangolin stocks held by the USG include approximately: 66 hides, 8 leather belts, 80 boots/shoes (~40 pairs), 486 scales, 4 claws, 238 leather shoe pieces (vamp of the shoe; confiscated together), 3 mounted pangolin bodies, and a small collection of seized specimens identified as medicinal products (e.g., approximately 6 boxes of tonic/pills, 63 crushed scales intended for medicinal use). Consistent with CITES Resolution Conf. 17.8 (Rev. CoP19) on *Disposal of illegally traded and confiscated specimens of CITES-listed species*, pangolin specimens (as Appendix-I specimens) that are not destroyed can only be used for *bona fide* scientific, educational, enforcement, or identification purposes; they may not be entered into trade domestically or otherwise used for commercial purposes. Most seized pangolin specimens that are retained for educational purposes are kept at the U.S. Fish and Wildlife Service's National Eagle and Wildlife Property Repository in a secured storage facility. In some cases, seized pangolin specimens that are retained for scientific, enforcement, or identification purposes are kept at the U.S. Fish and Wildlife Service's National Forensics Laboratory (Lab) until investigations are completed or are maintained at the Lab and used as reference specimens.

In addition to the information on stocks, the U.S. response to the Notification to the Parties 2024/096 included: a short list of pangolin imports and exports from 2017-2023; a brief note on enforcement challenges and best practices; a brief summary about demand for pangolin products in the U.S. (thought to be extremely limited, particularly as there is no legal avenue for supply); and information on pangolin breeding activities (limited to two private non-profit zoos in the U.S. holding a total of 20 animals, as part of a conservation breeding program for research and education; this effort is not associated with or funded by the federal government, and any offspring produced are not for commercial purposes). Additionally, attached to the U.S. response to the Secretariat is a list of all U.S. seizures of pangolin specimens from 2017-2023; the dataset included: date of seizure, origin, port, reason for seizure, species (if known), mode of transport, quantity, type of specimen, final disposition, and other details.

(iv) Destroy U.S. government-held, stockpiled pangolin specimens not being used for *bona fide* scientific, educational, enforcement, or identification purposes (in line with Resolution Conf. 17.8 (Rev. CoP19)) and advertise an opportunity for the public to voluntarily relinquish any privately-held pangolin or other Appendix-I specimens for inclusion in the government's stockpile destruction action.

Progress to date: The policy and practice of OLE is to destroy pangolin specimens after seizure, consistent with [U.S. Title 50 Code of Federal Regulations Part 12 Seizure and Forfeiture Procedures](#), with few exceptions, as noted above. Therefore, the only

remaining pangolin specimens held by the USG are currently being used for *bona fide* scientific, educational, enforcement, or identification purposes, as detailed in the previous section. There are no excess pangolin specimens that are eligible for destruction at present.

As part of an effort to lower the supply of privately-held pangolin and other Appendix-I specimens within the United States, the U.S. Fish and Wildlife Service worked with the Association of Zoos and Aquariums' Wildlife Trafficking Alliance and Zoo Miami this fall to provide the public an opportunity to voluntarily abandon and/or donate elephant ivory and other protected wildlife specimens (including pangolin specimens) through a "Toss the Tusk" event held at Zoo Miami on November 9, 2024. This provided a way for members of the public to properly dispose of protected wildlife products.

Additionally, U.S. Fish and Wildlife Service is requesting the public to voluntarily abandon or donate pangolin specimens in their possession, as seen on the USFWS [International Affairs](#) and [Office of Law Enforcement](#) websites. This campaign will run from December 2024 through March 2025. The process for voluntary relinquishment of CITES-listed specimens is [detailed online](#).

- (v) Review the status of pangolin species under the stricter domestic measures of the U.S. Endangered Species Act (ESA) and submit to the Office of the Federal Register a determination on the classification of these taxa under the ESA (pursuant to the procedures in 16 U.S.C. § 1533(b)(3)(B)).**

Progress to date: The U.S. Fish and Wildlife Service's Ecological Services is undertaking a Species Status Assessment for seven pangolin species, and a determination on the classification under the Endangered Species Act (pursuant to the procedures in 16 U.S.C. § 1533(b)(3)(B)) is expected by June 2025. (Note: Temminck's ground pangolin is already listed as endangered under the ESA).

- (vi) Continue to support law enforcement activities to counter wildlife trafficking across pangolin range countries, maintain liaison with law enforcement agencies in source, transit and destination countries and support their investigative efforts.**

Progress to date: The United States continues to work closely with our international partners to disrupt and dismantle criminal organizations engaged in the trafficking of pangolins and to take all available enforcement actions to protect pangolins from further exploitation. U.S. Fish and Wildlife Service's **OLE** is providing training in support of the International Law Enforcement Academies that covers a myriad of topics to support wildlife law enforcement and conservation in Botswana and Thailand in 2025. Additionally in 2025, OLE will be providing Wildlife Evidence and Recovery Training in countries including, but not limited to, Tanzania, Zambia, Nepal, and Malaysia.

The **U.S. Agency for International Development (USAID)** is supporting anti-poaching efforts in protected areas in Africa to deter and detect trade in wildlife, including pangolins. Additionally, USAID recently funded canine wildlife crime detection units in the Democratic Republic of the Congo, Uganda, and Kenya. Uganda's canine unit contributed to six intelligence-led operations that resulted in the seizure of 57.3 lbs (26 kg) of ivory and 110 lbs (49.9 kg) of pangolin scales, and all units continue to provide vigilance and deterrence. Following initial support from USFWS, USAID also helped train 15 scent detection African giant pouched rats, known as "Hero Rats," in the port of Dar es Salaam, Tanzania. The Hero Rats have been trained to identify the scent of pangolin scales, ivory, and rhino horn in a simulated environment, and may have been deployed in real-world detection as of this submission.

- (vii) Engage with pangolin range states on capacity-building efforts to enhance pangolin conservation and anti-poaching measures.**

Progress to date: Several on-going and capacity-building projects support pangolin range states with combating pangolin trafficking or wildlife trafficking more broadly.

The **U.S. Department of State's Bureau of International Narcotics and Law Enforcement Affairs (INL)** is currently implementing the following relevant projects:

Zimbabwe (2024-2026): The Tikki Hywood Foundation, in partnership with INL, is developing innovative tracking and monitoring technology to assess pangolins that have been released after being rehabilitated. The program also mentors rangers on how to track pangolins to monitor their wellbeing and develops educational packages for community liaisons about pangolin trafficking and the importance of this species within the environment.

Nepal (2024-2026): Greenhood Nepal, working with INL, is synthesizing available data on how the international wildlife trade affects Nepal and developing a Regional Pangolin Conservation Strategy for South Asia, with collaboration from the IUCN SSC Pangolin Specialist Group and the South Asia Wildlife Enforcement Network.

INL is also building capacity to strengthen criminal justice sector responses to wildlife crime across taxa, and the following projects are benefiting pangolins as part of this work:

- Namibia and Angola (2023-2026) – support to the Namibia Nature Foundation, with a specialized focus on confiscated pangolins;
- Zambia, Mozambique, Namibia, and the Democratic Republic of the Congo (2021-2026) – support to Wildlife Crime Prevention, with a nexus to numerous pangolin trafficking cases;
- Kenya and Tanzania (2021-2025) – support to TRAFFIC, with one component of the project focusing on pangolin scale identification for law enforcement officers;
- Malawi and Zimbabwe (2019-2024) – support to Lilongwe Wildlife Trust, with efforts including pangolin-specific activities; and
- Malaysia, Laos, Thailand (2022-2026) – support to Trace, with efforts including a review on current DNA mapping options for seized pangolin products.

Additionally, INL is working in several pangolin range states to combat wildlife trafficking more broadly; while those efforts are not pangolin-specific, they benefit wildlife across taxa and are located in pangolin range states throughout Africa and Asia.

USAID made a five-year global award in September 2023 to a consortium led by World Resources Institute that addresses four nature crimes on three continents, including illegal wildlife trade. Through that award, [Countering Nature Crime](#) (CNC), the Wildlife Conservation Society (WCS) is undertaking a pangolin scale and elephant ivory trade analysis to identify enforcement vulnerabilities and support collaborative action by governments and other partners in Africa and Asia, especially Nigeria, Republic of the Congo, and Laos. WCS is also building capacity for crime science and behavioral insights research with partners in Asia to inform and deliver demand reduction strategies for pangolin scales, ivory, and other wildlife products.

CNC is complementary to [USAID End Wildlife Crime](#) (EWC), a regional response to wildlife trafficking in Asia through 2028 that aims to strengthen governance in the Association of Southeast Asian Nations (ASEAN) and foster increased collaboration and coordination among regional organizations, governments, the private sector, development partners, and civil society organizations (CSOs). EWC and CNC are building on prior USAID investments to strengthen judicial and customs authorities globally and support consumer research and demand reduction efforts in Asia related to pangolin, ivory, rhino, and tiger products.

U.S. Fish and Wildlife Service (USFWS) continues to invest in long-term capacity-building for international wildlife conservation, including for pangolins specifically. For example, USFWS's International Affairs program worked with the Zoological Society of London to launch the 18-month MENTOR-POP (*Progress on Pangolins*) post-graduate program in 2016-2017. Nearly a decade later, the nine early-career conservationists from this program continue to champion the conservation of pangolins in Central Africa. USFWS remains active in mentoring and developing the professional capacity of the nine MENTOR-POP Fellows, many of whom are now in leadership roles with their governments, non-governmental organizations, and universities in the region. MENTOR-

POP Fellows are members of the IUCN SSC Pangolin Specialist Group and continue to host annual World Pangolin Day celebrations to promote awareness on pangolin conservation and threats such as trafficking. MENTOR-POP Fellows in Cameroon, Gabon, and the Democratic Republic of the Congo have gone on to lead pangolin conservation groups, teach about pangolins, and conduct pangolin research.