

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



Seventy-seventh meeting of the Standing Committee
Geneva (Switzerland), 6–10 November 2023

Illegal trade and enforcement

CONSERVATION OF AND CONTROL OF TRADE
IN THE TIBETAN ANTELOPE (*PANTHOLOPS HODGSONII*)

1. This document has been prepared by the Secretariat.
2. Resolution [Conf. 11.8 \(Rev. CoP17\)](#) on *Conservation of and control of trade in the Tibetan antelope*, in paragraph 2 b), directs the Standing Committee as follows:

2. *DIRECTS*

...

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

Implementation of Resolution Conf. 11.8 (Rev. CoP17)

3. At its 74th meeting (SC74; Lyon, March 2022), the Standing Committee encouraged Parties affected by illegal trade in specimens of Tibetan antelope (*Pantholops hodgsonii*) to continue to approach the CITES Management Authority of Switzerland for assistance with identification methods, as well as exchange of information and knowledge regarding this illegal trade. The Committee further encouraged India and Italy to enhance efforts to strengthen the capacity of their border officials concerning the identification of Tibetan antelope specimens, in particular garments and cloth, including by drawing upon the support available from Switzerland, as appropriate (see summary record [SC74 SR](#)).
4. On 18 July 2023, the Secretariat issued [Notification to the Parties No. 2023/086](#) inviting Parties to submit to the Secretariat information on their implementation of Resolution Conf. 11.8 (Rev. CoP17) and any other information deemed relevant. Responses were received from China, India, Italy, Switzerland, and the United States of America. The reports submitted are compiled in the Annex to the present document, in the language and format in which they were received. A brief summary of key elements reported by Parties in their responses to the Notification is provided in paragraphs 5 to 9 below.
5. **China's** report provides information on laws and regulations in place; protection measures mobilized; law enforcement cooperation; and activities to raise public awareness. The Party highlights that the Tibetan antelope is listed as a national first-class protected species in its legislation, and that legislation makes provision for strict deterrent penalties in case of offences. Its Construction Plan for National Parks and other Natural Protected Areas and Major Projects for the Protection of Wildlife (2021-2035) includes the Tibetan antelope as one of 48 rare and endangered wild animals of focus. Furthermore, China reports on its cooperative approach by law enforcement which facilitates joint action between different ministries and annual meetings to formulate policy, support training and research and strengthen international cooperation. The Party highlights in its report that the Tibetan antelope population remains at more than 300,000 and attribute this to the protection measures it has mobilized.

6. **India** highlights in its response that the Tibetan antelope is protected under Schedule I of its Wildlife (Protection) Act of 1972 and thus accorded the highest degree of protection. India further reports that this Act was amended in 2022 to include CITES provisions and strengthen penalties. The Party highlights that its authorities have been taking action to prevent illegal trade in Tibetan antelope specimens. From 2009 to 2021, Indian enforcement agencies seized 828 Shahtoosh shawls. India further reports on the work of its Wildlife Crime Control Bureau (WCCB) and awareness programmes conducted in the period from 2014 to 2023, in which more than 13,000 enforcement officers participated. The report highlights 'Operation Soft gold', undertaken from October 2018 to March 2019 and specifically addressing illegal trade in specimens of Tibetan antelope. This operation led to the development of a 'Field Guide on Shahtoosh' for use by law enforcement agencies, aimed at identification and providing insights into the scope of this illegal trade.
7. **Italy** reports that its enforcement authority of Arma dei Carabinieri is in communication with the relevant Swiss Authorities with the intention of incorporating an operation to counter illegal trade of Tibetan antelope specimens into an upcoming operational plan for 2024 to 2025. This potential inclusion could facilitate the organization of a European inspection campaign. The Guardia di Finanza (GdF) has established a Memorandum of Understanding with the Swiss authorities to enhance cooperation and collaboration. GdF will raise awareness about the importance of addressing the illegal trade in Tibetan antelope specimens within its units, particularly focusing on the units engaged in controlling trade with Switzerland.
8. **Switzerland** in its report states that, in the period from 2020 up to July 2023, its authorities made the following seizures:

	2020	2021	2022	2023
Number of Shatoosh seizure cases	63	55	30	7
Number of Shatoosh shawls seized	103	63	33	11

9. The Secretariat notes that there are some discrepancies between the data recorded in the CITES Illegal Trade Database for 2020 and 2021 as shown in Table 1 below in the present document and data for 2020 and 2021 provided by Switzerland in its response to Notification to the Parties No. 2023/086. The Secretariat followed up with Switzerland in this regard and the Party clarified that data submitted in Switzerland's annual illegal trade reports only includes closed cases, which is why the numbers reported in the response to the Notification are slightly higher than what is recorded in the database.
10. Switzerland highlights that, in 2021, a commercial shipment of shawls containing a low content of Tibetan antelope fibres was seized, noting that this creates identification and enforcement challenges and raises questions about the way in which the material is sourced and used. Switzerland reiterated its commitment to continue its work in this area, stating that training activities on Shahtoosh identification is planned to take place in the latter part of 2023. It also seeks to improve collaboration with other CITES Parties to address issues related to this illegal trade. In this regard, Switzerland notes that good exchange of information and knowledge with India is taking place.
11. **The United States of America** highlights in its response that the Tibetan antelope is listed as "endangered" under the provisions of the U.S. Endangered Species Act, prohibiting various activities related to the species. The report includes information on four shipments seized in the United States since 2017 that contained Tibetan antelope specimens. Most of the Shahtoosh shawls recently seized in the United States comprised a blend of Tibetan antelope fibres and other species including cashmere goat, making detection more difficult. The report from the United States further provides information about the species identification work undertaken by the United States Fish and Wildlife Service laboratory and notes the technical assistance support available through its International Operations Unit (Attaché Program).

Secretariat analysis of CITES illegal trade data

12. The Secretariat conducted an analyses of seizure data covering the period 2016 to 2021, submitted by Parties and included in the CITES Illegal Trade Database, as presented in Table 1 below. The data indicates that six Parties (India, Nepal, the Netherlands, Switzerland, the United Kingdom of Great Britain and Northern Ireland, and the United States of America) reported a total of 245 Tibetan antelope specimen seizures between 2016 and 2021. Most of these seizures (95.5%) were reported by Switzerland.
13. The most seized specimens were garments, accounting for 365 out of the total 439 seized specimens. Other seized specimens included medicines, extracts, cloths, skins, and horns.

Year	Total No. of seizures	Total No. of seized specimens	Number and type of specimens seized					
			Garment	Medicine	Extract	Cloth	Skin	Horn
2016	19	27	25					2
2017	18	88	73	10		5		
2018	31	98	43	2		50	3	
2019	67	81	79		1	1		
2020	61*	90*	90					
2021	49*	55*	55					
Total	245	439	365	12	1	56	3	2

*Table 1. Number of seizure records of *Pantholops hodgsonii* and number of *P.hodgsonii* specimens seized between 2016 and 2021 recorded in the CITES Illegal Trade Database. * The Secretariat notes that there are some discrepancies between data from the CITES Illegal Trade Database and data provided by Parties in their responses to Notification to the Parties No. 2023/086 for 2020 and 2021. These discrepancies are clarified in paragraph 9 of the present document.*

14. The data in the CITES Illegal Trade Database shows a slight decrease in the number of seized specimens from 90 in 2020 to 55 in 2021. All reported seizures of Tibetan antelope specimens in 2020 and 2021 were garments and were seized in Switzerland.

Conclusions

15. Information provided by Parties regarding their efforts to address illegal trade in Tibetan antelope specimens demonstrates commitment and ongoing efforts. It is encouraging to note that Parties are taking enforcement initiatives to cooperate and exchange information to tackle this illegal trade. While there has been a decrease in the number of seizures in recent years, the data also underscores that illegal trade in Tibetan antelope specimens continues. It therefore remains important for Parties to maintain vigilance and uphold their enforcement measures.
16. The Secretariat notes that, like Switzerland, the United States of America reported on recently seized Shahtoosh shawls that comprised of a blend of Tibetan antelope fibres and other species. Parties are encouraged to take note of this emerging trend and to bring it to the attention of their relevant authorities.

Recommendations

17. The Standing Committee is invited to note the present document.

RESPONSES FROM PARTIES TO NOTIFICATION NO. 2023/086
ON TIBETAN ANTELOPE (*PANTHOLOPS HODGSONII*)

CHINA

**Report on the Implementation of Resolution Conf.11.8 on
Protection and Trade Control of Tibetan Antelopes**

As one of the flagship species on the Qinghai-Tibetan Plateau, the Tibetan antelope mainly ranges in steppe, steppe meadow and alpine steppe areas at an altitude of 4000-5500m in Tibet Province, Qinghai Province and Xinjiang Uygur Autonomous Region. In recent years, by improving legal protection system, continuously cracking down on illegal hunting and trading, strengthening protection measures from its source, cutting off illegal supply, China has been continuously promoting conservation of Tibetan antelopes.

1. Laws and Regulations

China adheres to the principles of prioritizing protection, regulating utilization, and strengthening supervision, and improves preventive and punitive measures for wildlife protection. A legal system for wildlife protection has been formed, with the Wildlife Protection Law of the People's Republic of China and the Criminal Law of the People's Republic of China as the main body, complemented by the Regulations of the People's Republic of China on the Management of the Import and Export of Endangered Wild Animals and Plants and relevant judicial interpretations.

The Tibetan antelope is listed as a national first-class protected wild animal. Firstly, article 21 of the wildlife conservation law stipulates that it is forbidden to hunt or kill wildlife under special state protection. Secondly, China introduced "Wild Animals and their Products Value Assessment Measures" to clarify the benchmark value standard of Tibetan antelope, and the judicial authorities will punish the wildlife offenders according to the value of the wildlife involved. Thirdly, Criminal Law of the P.R. China determines punishment according to the circumstances of the crime. If the circumstances are particularly serious, criminals are sentenced to fixed-term imprisonment of not less than 10 years or even a life-time imprisonment, as well as a fine and confiscation of illegal specimens, illegal gains and even personal property.

2. Protection Measures

Firstly, the Tibetan antelope is included in the 48 rare and endangered wild animals in the Construction Plan for the Construction of National Parks and other Natural Protected Areas and Major Projects for the Protection of Wildlife (2021-2035), and it is emphasized that supplementary measures such as habitat restoration and connectivity should be taken to strengthen field patrol monitoring to prevent poaching and habitat destruction. Secondly, animal passageways have been built for species such as Tibetan antelope to improve habitat connectivity; Thirdly, national parks and nature reserves related to Tibetan antelopes have been established to strengthen the protection measures.

3. Cooperated Law Enforcement

Chinese government has established the Inter-Ministerial Joint Conference on Combating Illegal Trade in Wildlife attended by 27 ministries and inter-departmental Coordination Group on CITES Law enforcement attended by 9 ministries, and these participants jointly carried out a series of enforcement operations including "Operation Breeze", "Operation Net Shield" and special operations of "Constant Monitoring" and "Import Control at the Boarder". By holding annual meetings, formulating specialized policies, holding joint training workshops, conducting cooperative research, supervising law enforcement, organizing special operations, and strengthening international cooperation, China fights against the destruction of wildlife resources and entire chain of illegal trade on wildlife such as Tibetan antelopes.

4. Raise of Public Awareness

By making full use of Wildlife Protection Awareness Month, World Wildlife Day, International Biodiversity Day and other environmental awareness programs, China improved knowledge sharing of wildlife, including the Tibetan antelope, protection, boosted public participation, and raised public awareness of wildlife

conservation. Through intensified protection measures, remarkable results have been achieved in the protection of the Tibetan antelope, and its population has recovered rapidly. The

number of Tibetan antelope distributed on the Qinghai-Tibet Plateau has recovered from more than 70,000 in the 1980s to more than 300,000.

P. R. China 2023/8/3



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DO No. WL-4/64/2023-WL

Dated: 3rd August, 2023

Sub: CITES Notification No. 2023/086 - Tibetan antelope (*Pantholops hodgsonii*).

Dear Ms Higuerro,

Please refer to the CITES Notification No. 2023/086, regarding submission of information on implementation of Resolution Conf. 11.8 (Rev. CoP17) on Conservation of and control of trade in the Tibetan antelope.

2. In India, the Tibetan Antelope (*Pantholops hodgsonii*) is listed in the Schedule-I of the Wild Life (Protection) Act, 1972 and thereby accorded the highest degree of protection from hunting and illegal trade of its parts and products. The Act was amended in the year 2022, wherein, besides incorporation of the provisions of CITES in the Act, the penalties for violation of provisions of the Act have also been enhanced.

3. The Indian enforcement agencies have been taking actions for preventing the illegal trade in the parts and products of the species. During the years 2009 to 2021, the enforcement agencies in India had seized a total of 828 number of *Shahtoosh* shawls, in different Indian ports.

4. The Government of India has established a Wild Life Crime Control Bureau (WCCB) under the provisions of the Wild Life (Protection) Act, 1972 and the Bureau has also conducted a more than 200 sensitization / awareness programmes between 2014 and 2023, for various enforcement agencies at exit points. These sensitization programmes were attended by more than 13,000 enforcement officers. In addition, the Bureau has also conducted an enforcement operation, code named as '*Operation Soft gold*', from October, 2018 to March, 2019, specifically with respect to illegal trade in Tibetan antelope. Based on the outcomes of the *Operation Soft gold*, '*A Field Guide on Shahtoosh*', for the law enforcement agencies has been brought out with a view to help understand the dimensions of its illegal trade and also act as a ready reckoner for identification of shahtoosh and its products.

5. We wish to reiterate our commitment for conservation of wildlife and control of illegal trade in wildlife and its parts and products, including Tibetan Antelope.

ITALY

Notification 2023/086_ Tibetan antelope (*Pantholops hodgsonii*)

The Enforcement Authority_Arma dei Carabinieri maintains relations with the competent Swiss Authorities, aimed at the potential inclusion in one of the next OAs of the 2024-2025 operational plan, of an operation to combat the illegal trafficking of specimens of Tibetan antelope, within the frame of the “European Multidisciplinary Platform Against Criminal Threats” (EMPACT). Such inclusion would allow the planning of a possible European campaign of controls, in which technicians specialized in the identification of antelope derivatives would provide a training/operational support, as suggested in the 74th CITES Standing Committee of March 2022.

The Enforcement Authority competent to perform controls in Customs, Guardia di Finanza (GdF), has signed a memorandum of understanding with the Swiss authorities: the two authorities have recently renewed their respective strategic lines in order to develop new mutual channels of collaboration on this issue; moreover, Guardia di Finanza will highlight the importance of tackling the illegal trafficking of specimens of Tibetan antelope among its Units, starting from the ones that are more engaged in controls on the trade from Switzerland.

Switzerland

In response to Notification No. 2023/066, we are sending you the seizure numbers of Shahtoosh Shawls for Switzerland. Since we reported data up to the year 2019 the last time that we sent this kind of information to the Secretariat, we will now report data from 2020 onwards (up to July 2023):

	2020	2021	2022	2023
Shahtoosh seizure cases	63	55	30	7
No of Shahtoosh shawls	103	63	33	11

Something to highlight is the seizure of a commercial shipment in 2021, which is an ongoing case. The interesting and also challenging aspect of that case is a very low content of Shahtoosh fibers in the shawls in question, which brings up not only enforcement and identification challenges but also questions around the way the material is sourced and used.

Switzerland is still very committed to continue the work we have been doing in this area. There are some focal trainings on the identification of Shahtoosh planned for later this year. Switzerland continues to seek to improve the collaboration with other CITES Parties in this area. We can report on good exchange of information and knowledge with India.

As always, we would be very interested in hearing about any seizures of information from other Parties and remain open for any further collaboration with countries that also experience issues with this trade.

UNITED STATES OF AMERICA

U.S. Response to Notification to the Parties No. 2023/086

In Response to Notification to the Parties No. 2023/086, the United States submits the following information on our implementation of Resolution Conf. 11.8 (Rev. CoP17), *Conservation of and control of trade in the Tibetan antelope*. Below are enforcement measures taken by the United States to reduce the illicit trade of Tibetan antelope products.

In 2006, the U.S. listed Tibetan antelope (*Pantholops hodgsonii*) as “endangered” under the provisions of our domestic law, the U.S. Endangered Species Act, thus prohibiting certain activities including import; export; sale or offer for sale in interstate or foreign commerce; deliver, receive, carry, transport, or ship in the course of commercial activity in interstate or foreign commerce; take; and possession and other activities with unlawfully taken specimens of the species.

Despite our domestic legislation and the protections afforded under CITES from 2017 to the present, the U.S. Fish and Wildlife Service (USFWS) Office of Law Enforcement has intercepted and seized four (4) import shipments containing Tibetan antelope products:

- Two (2) shipments consisting of medicinal items containing Tibetan antelope imported from Vietnam, one (1) for personal use and one (1) for commercial purposes.
- Eight (8) *Shahtoosh* shawls imported from India for commercial purposes.
- One (1) *Shahtoosh* shawl imported from Sweden for personal use.

We note that most of the *Shahtoosh* shawls seized in the U.S. recently have been comprised of a blend of Tibetan antelope fibers and other *Capra* species including cashmere goat, making detection more difficult. The USFWS Clark E. Bavin National Fish and Wildlife Forensics Laboratory uses scanning electron microscopy (SEM) to distinguish *Pantholops* dorsal guard hair fibers from those of other bovids. The National Fish and Wildlife Forensics Laboratory occasionally assists other Parties in answering questions regarding *Shahtoosh* identification.

The USFWS Office of Law Enforcement has also helped counter the illicit trade in Tibetan antelope through their International Operations Unit (Attaché Program). USFWS Attachés are placed at U.S. Embassies strategically across the globe, where they stand ready to facilitate and provide technical assistance with wildlife trafficking investigations.