

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 ANIMALS COMMITTEE

1. This document has been submitted by the Chair of the Animals Committee.*
2. At its 19th meeting (CoP19; Panama City, 2022), the Conference of the Parties adopted a set of [Decisions on Pangolins \(*Manis* spp.\)](#). Decisions 18.238 and 18.239 were renewed and new Decisions 19.200 to 19.204 were adopted. Of these, Decisions 18.238, 18.239, 19.200, 19.203 and 19.204 were of most relevance to the Animals Committee 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*

* *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.*

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 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 (ICCWC) 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 18.238 (*in situ* pangolin management and conservation programmes)

3. Concerning the implementation of Decision 18.238, the Secretariat issued Notification to the Parties No. [2024/022](#) on 24 January 2024, requesting information concerning the development and implementation of *in situ* pangolin management and conservation programmes. The Secretariat noted that the reference to paragraph 7 in Decision 18.238 is incorrect. It should refer to paragraph 10 of Resolution Conf. 17.10 (Rev. CoP19), which reads:
 10. *URGES range States to work with appropriate bodies and experts to develop and implement in situ pangolin management and conservation programmes, which include population assessments, the making of non-detriment findings for trade in the species, monitoring, and management and conservation measures.*
4. Pangolin range States were requested to provide any relevant information on the development and implementation of *in situ* pangolin management and conservation programmes to the Secretariat, so that the responses can be included in its report to the 33rd meeting of the Animals Committee (AC33, Geneva, July 2024).
5. Five responses to the Notification were received from Malaysia, Namibia, Philippines, Singapore and Thailand. A summary of these responses was presented in Annex 1 to document [AC33 Doc. 35](#).
6. The information, plans and strategies shared by the five Parties address the key aspects referred to in paragraph 10 of the Resolution and although non-detriment findings are not specifically referred to, the information referred to in the responses received could inform NDFs. Thailand indicated that it would welcome support from relevant organizations and experts in acquiring expertise and training relating to the captive care of the species to enhance its survival.
7. Based on the data in the CITES Trade Database, trade from these five Parties from 2016 – 2022 were mainly for scientific purposes (from wild source and confiscated / seized sources).
8. At AC33, the Animals Committee agreed draft decisions directed at Parties, intergovernmental organizations, non-governmental organizations that are encouraged to support pangolin range States with resources, both financial and technical expertise, to implement *in-situ* pangolin conservation and management programmes develop in response to Decision 18.238 (draft decisions agreed by AC33 contained in the Annex to the present document).

Implementation of Decision 18.239 (conversion parameters for all pangolin species)

9. Decision 18.239 has been implemented thanks to a financial contribution from France to the Strategic Programme of the International Consortium on Combating Wildlife Crime (ICWC). The Secretariat worked with the Species Survival Commission Pangolin Specialist Group of the International Union for Conservation of Nature (IUCN), hereafter referred to as “the pangolin specialist group”, 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, in collaboration with the pangolin range States.
10. A report on conversion parameters was presented to the Animals Committee at its 32nd meeting (AC32; Geneva, June 2023), in the Annex to document [AC32 Doc. 31](#). The report stated that “development of conversion parameters requested by the CITES Parties requires data on scale mass for each pangolin species”. As published estimates were already available for the Chinese (*Manis pentadactyla*) and Sunda pangolins (*M. javanica*) (Zhou et al. 2012), the principal focus of this project was to collect primary data on scale mass for the six other pangolin species: *M. culionensis*, *M. crassicaudata*, *M. tetradactyla*, *M. tricuspis*, *M. gigantea*, and *M. temminckii*.
11. The report in the Annex to document [AC32 Doc. 31](#) concluded by outlining a number of next steps that need to be taken, including further data collection and examination of bias associated with the estimates, before scale mass estimates for all eight pangolin species can be considered robust to derive the finalised conversion parameters. The pangolin specialist group indicated that it had secured additional funding through a Pangolin Crisis Fund project titled “[Developing Robust Conversion Parameters for Seized Pangolin Scales](#)” that enabled this research to be carried out. The Animals Committee invited the IUCN pangolin specialist group to provide an updated report for consideration at AC33.

12. An updated report, including revised conversion parameters for pangolins, was presented to AC33 in Annex 2 to document [AC33 Doc. 35](#). The revised data on scale mass for the eight pangolin species is presented in the table below, presented as means with 95% confidence intervals and medians:

Table 1. Scale mass estimates as conversion parameters for the eight species of pangolin, based on contributed data.

Species	Mean \pm SD (95% CIs) (g)	Range (g)	Median (g)
Giant pangolin <i>M. gigantea</i>	3853.01 \pm 617.22 (3815.12-3980.89)	2030 - 5448	3876.5
Temminck's pangolin <i>M. temminckii</i>	2020.1 \pm 935.72 (1582.17-2458.03)	342.25 - 3911	1928.88
Indian pangolin <i>M. crassicaudata</i>	1299.95 \pm 623.64 (923.08-1676.81)	56.25 - 2099.66	1096.89
Chinese pangolin <i>M. pentadactyla</i>	592.98 \pm 217.63* (518.22-667.73)	129.47 - 1121.07*	573.47*
Sunda pangolin <i>M. javanica</i>	367.54 \pm 161.48 (338.24-396.24)	27.19 - 824.54*	357.75
Philippine pangolin <i>M. culionensis</i>	368.28 \pm 79.84 (331.93-404.62)	275 - 553	341
Black-bellied pangolin <i>M. tetradactyla</i>	322.68 \pm 27.82 (320.97-324.38)	118 - 379	324
White-bellied pangolin <i>M. tricuspis</i>	184.02 \pm 50.61 (165.45-202.58)	115.5 - 322.06	184.31

*This estimate was first reported in Zhou *et al.* (2012).

13. The IUCN pangolin specialist group highlighted several limitations with the analysis presented. The substantial effort by the authors and their collaborators (see Acknowledgements) since 2021 has produced the best data available for each species to date. Despite this, the conversion parameters are not yet based on standardised samples of, for example, 30 adults of species, which is the case for *M. culionensis*, *M. crassicaudata* and *M. temminckii*. Nor is the data reflective of the intraspecific heterogeneity for which there is preliminary evidence, especially for the more widely distributed species (e.g., *M. temminckii*). There are also concerns about the condition of scales used to estimate scale masses.
14. There are several steps that need to be taken before scale mass estimates for all eight pangolin species can be considered robust to derive the finalised conversion parameters. Thanks to additional funding from the Pangolin Crisis Fund (PCF) for a project titled "Developing Robust Conversion Parameters for Seized Pangolin Scales," much of the work remains ongoing.
15. The Animals Committee agreed that the conversion parameters presented in the table in paragraph 12 above for *M. gigantea*, *M. javanica*, *M. pentadactyla*, *M. tetradactyla* and *M. tricuspis* can be used by Parties in cases where national legislation demands that such information be provided for law enforcement and court purposes.
16. The Animals Committee also agreed at AC33 to submit the draft decisions in the Annex to the present document to the Standing Committee for its consideration and onward submission to the 20th meeting of the Conference of the Parties (CoP20).
17. The Animals Committee further agreed at AC33 that Decision 18.239 has been implemented and can be proposed for deletion at the 20th meeting of the Conference of the Parties (CoP20).

Implementation of Decision 19.203

18. Concerning the implementation of Decisions 19.203, the Secretariat issued [Notification to the Parties No. 2023/051](#) on *Materials for the identification of specimens of CITES-listed species* on 20 April 2023, including a request to 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) on *Conservation of and trade in pangolins* or identification materials concerning pangolin species, their parts and derivatives to bring such materials to the attention of the Secretariat. The Notification also sought to solicit samples from relevant and potential sources holding carcasses and skins, including zoos and museums, that can be used to increase the sample sizes to meet or exceed the minimum baseline of 30 specimens for those species not adequately represented, as requested by the Animals Committee at AC32.
19. Two responses were received: the United States of America and Shark Guardian and the following identification materials were identified (The first link is a guide to assist in the identification of wildlife species which are commonly found in trade in southeast Asia, while the second link refers to a guide that is specific to pangolins):
- https://www.traffic.org/site/assets/files/17352/eng_identification_sea_e.pdf and
 - <https://www.usaidrdw.org/pangolin-guide/>
20. The Animals Committee invited Parties to use these identification materials to support the identification of seized pangolin specimens at species level; and agreed to prioritize pangolins in the mandate of the proposed Animals Committee working group on identification materials, should it be established after CoP20.

Implementation of Decision 19.204, paragraph a)

21. In accordance with paragraph a) of Decision 19.204, the Standing Committee shall 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. The implementation of paragraph b) of Decision 19.204 is reported on by the Secretariat in document SC78 Doc. 67.2.

Recommendations

22. The Standing Committee is invited to:
- a) support the recommendation by the Animals Committee relating to the use of the conversion parameters presented in the table in paragraph 12 for *M. gigantea*, *M. javanica*, *M. pentadactyla*, *M. tetradactyla* and *M. tricuspis* by Parties in cases where national legislation demands that such information be provided for law enforcement and court purposes;
 - b) encourage Parties to use the following identification materials to support the identification of seized pangolin specimens at species level:
 - https://www.traffic.org/site/assets/files/17352/eng_identification_sea_e.pdf and
 - <https://www.usaidrdw.org/pangolin-guide/>; and
 - c) review and submit the draft decisions in the Annex to the present document for consideration at the 20th meeting of the Conference of the Parties.

DRAFT DECISIONS ON PANGOLINS (MANIS SPP.)

Directed to the Secretariat

20.AA 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 further develop conversion parameters for all pangolin species, in particular *M. culionensis*, *M. crassicaudata* and *M. teminckii*, taking into account document AC33 Doc. 35. These conversion parameters should 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

20.BB The Animals Committee shall:

- a) review the conversion parameters for all pangolin species, developed in accordance with the provisions of Decision 20.AA, 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; and
- b) make recommendations as appropriate to the Parties and the Standing Committee.

Directed to Parties and relevant stakeholders

20.CC Parties, intergovernmental organizations, non-governmental organizations are encouraged to support pangolin range States with resources, both financial and technical expertise, to implement *in-situ* pangolin conservation and management programmes developed in response to Decision 18.238.