

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



Sixty-sixth meeting of the Standing Committee
Geneva (Switzerland), 11-15 January 2016

Interpretation and implementation of the Convention

Species trade and conservation

Pangolins (Manidae spp.)

REPORT OF THE WORKING GROUP

1. This document has been submitted by the European Union as Chair of the Standing Committee inter-sessional Working Group on Pangolins.

Background

2. At its 65th meeting (SC65, Geneva, July 2014), the Standing Committee established an inter-sessional Working Group on pangolins with the European Union as Chair, and with the following membership: Cameroon, China, India, Indonesia, Kenya, Malaysia, Namibia, the Philippines, South Africa, Uganda, the United States of America, Zimbabwe, Animal Welfare Institute, Annamiticus, Born Free Foundation, Chinese Association of Traditional Chinese Medicine, Conservation International, Humane Society International, International Fund for Animal Welfare, IUCN, Lewis and Clark College, Species Survival Network, TRAFFIC, Wildlife Conservation Society, Wildlife Protection Society of India, WWF and the Zoological Society of London. Following the meeting, the Chair decided, upon request, to also add Italy as a member.
3. The mandate of the inter-sessional working group on pangolins was to:
 - a) Request the Secretariat to invite Parties to provide information on the conservation of and trade in Asian and African pangolin species, through a Notification, building on and expanding the request for information sent under Notification No. 2013/59, with information to be provided by 28 February 2015.
 - b) In preparation of the request under point (1), work with the Secretariat to prepare a questionnaire to assist Parties in compiling the information and to provide for a standardised approach for the replies.
 - c) Review the information provided by Parties following the Notification under point (1), and any other relevant information received.
 - d) Draft recommendations to address the illegal trade in pangolin species and report back on these recommendations to the 66th meeting of the Standing Committee.
4. The Working Group worked with the Secretariat in accordance with its mandate, to prepare a questionnaire to assist Parties in compiling information on the conservation of and trade in African and

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Asian pangolin species. At the request of the Working Group the Secretariat issued Notification to the Parties No. 2014/059 of 8 December 2014, making the questionnaire available as an Annex to the Notification.

5. In response to the Notification the Secretariat received reports from: Austria, Bangladesh, Bhutan, Botswana, Brunei Darussalam, Cameroon, Chad, China, Côte d'Ivoire, Finland, Gabon, Ghana, Greece, India, Indonesia, Italy, Kenya, Latvia, Malaysia, Myanmar, Namibia, Nepal, the Netherlands, Pakistan, the Philippines, Senegal, Singapore, Slovakia, South Africa, Thailand, Togo, Uganda, United Arab Emirates, United Republic of Tanzania, United States of America, Viet Nam, Zambia and Zimbabwe. These reports were subsequently submitted to the Chair of the Working Group on pangolins for review by the Working Group in accordance with its mandate. Further to these reports the Secretariat received reports submitted by Benin, the Central African Republic, Liberia, and Nigeria submitted to the organizers of the First Pangolin Range States Workshop held in Da Nang, Viet Nam, via the organizers of the workshop. The Secretariat also shared these reports with the Chair of the Working Group on pangolins.
6. From 24 to 26 June 2015, the First Pangolin Range States Workshop, which was co-hosted by the governments of Viet Nam and the United States of America and organized and facilitated by Humane Society International, took place in Vietnam. The meeting brought together delegates from 29 African and Asian pangolin range States, the Secretariat, one non-range State, pangolin experts and non-governmental organizations. The CITES Secretary General delivered a video statement to the workshop and the Secretariat presented a brief summary of the questionnaires submitted in response to Notification to the Parties No. 2014/059, on behalf of the Chair of the Working Group on pangolins. The recommendations agreed upon at the workshop were shared with the Working Group on Pangolins by the workshop organizers. They address enforcement, conservation, implementation, and data collection and include a recommendation to transfer all eight species in the genus *Manis* from Appendix II to Appendix I.
7. At its 27th meeting, the Animals Committee selected under the Review of Significant Trade the giant pangolin (*Manis gigantea*) and the three-cusped pangolin (*Manis tricuspis*) as species of priority concern in line with Resolution Conf. 12.8 (Rev. CoP13). As a follow-up to this meeting, the Secretariat notified all range States¹ of the two species about this selection and requested comments regarding possible problems relating to implementation of Article IV of the Convention. During its 28th meeting, the Animals Committee reviewed range States' responses to the Secretariat's letter, and noted that the United Republic of Tanzania was the only range State that provided a response to the Secretariat. Considering that Tanzania prohibits trade in these two species, the Animals Committee decided to remove this range state from the review. The Animals Committee also noted concerns raised at the First Pangolin Range States Workshop about the lack of robust biological information on African pangolins and increasing levels of international trade in these species. The Animals Committee decided therefore to retain in the review all other range States for *Manis gigantea* and *M. tricuspis* that do not fully protect these species through national legislation prohibiting their export. To assist this selection process, the Animals Committee recommended that the Secretariat consult with UNEP-WCMC and the IUCN SSC Pangolin Specialist Group to identify those range States that do not prohibit trade through national legislation and may therefore require a more detailed review. The Secretariat was then requested to finalize the selection of range States in consultation with the Animals Committee, after which the Secretariat will proceed with the compilation of information regarding the species concerned for review by the Animals Committee at its 29th meeting and adoption of recommendations as appropriate.

Summary of Key Findings from the replies to the Questionnaire

8. Regarding the questions on information about conservation status of pangolins, the vast majority of range States consider the pangolin population either as data deficient or in decline. Only one range state reported an increasing pangolin population.
9. Regarding the question on impact of illegal trade on the wild populations of pangolin species, again data paucity proved a significant challenge. Amongst the countries that replied, several African range States noted an increase in domestic illegal trade. India expressed serious concerns about the impact of illegal trade on its pangolin population.
10. Regarding the applicable legislative and regulatory framework, a majority of range States has legislation in place that covers both native and non-native species. Pangolins are usually included in general species

¹ Angola, Benin, Burkina Faso, Burundi, Cameroon, Central African Republic, Chad, Congo, Côte d'Ivoire, Democratic Republic of the Congo, Equatorial Guinea, Gabon, Gambia, Ghana, Guinea, Guinea Bissau, Kenya, Liberia, Mali, Mauritania, Niger, Nigeria, Rwanda, Senegal, Sierra Leone, South Sudan, Togo, Uganda, United Republic of Tanzania, Zambia

protection legislation rather than in specific laws. Some range States both in Africa and Asia only protect native pangolin species through law. Concerning the regulation of domestic use, the replies vary; in the majority of range States, all use is prohibited, in some only consumptive use is prohibited.

11. Regarding applicable penalties, there is a broad variation in levels and types applicable, including in a large number of countries the possibility of imprisonment.
12. Only three countries reported legal imports, and five countries reported legal exports of pangolin specimens beyond what is reflected in the CITES trade database.
13. Regarding enforcement measures taken, the majority of range States both in Africa and in Asia as well as one non-range state reported seizures made in the last five years. A number of countries have regulations or standard operating procedures for the management, storing and disposing of confiscated specimens in place. When asked about specific enforcement challenges, the replies comprised a large range of problems from lack of training, insufficient human and financial resources, insufficient information about organized criminal groups involved, the insufficient awareness of local communities, and the lack of coordination between the different agencies involved. When asked about best practices in enforcement, a large variety of tools were highlighted, including training workshops, engagement with communities, inter agency cooperation, cooperation with NGOs, joint operations, public awareness campaigns in airports and shopping centres and through social media. A majority of range States has engaged in some form of international cooperation in combatting poaching or illegal trade in pangolins, using mostly international enforcement networks such as the Lusaka Task Force, ASEAN WEN or Interpol.
14. Regarding known forms of use, meat consumption (meat) and medicinal use (live animals, scales, skins, fetuses, blood, bones) are most frequently listed in both African and Asian range States. Also mentioned by several African range States are cultural rituals (gift, witchcraft – scales, live animals, blood, bones), display (scales, bones), leather and decorative carving (scales).
15. Twelve countries, eleven of which are range States, reported the existence of stockpiles [government or privately owned]. Five countries reported captive breeding activities, two of which are exclusively for zoological purposes. Only Uganda reported on a pilot project for captive breeding for trade purposes.
16. Regarding demand management measures, only a few range States reported on awareness raising measures with the public in general, but, with the exception of Vietnam, it does not appear that specific demand reduction measures have been taken.
17. Regarding education and awareness raising measures, a majority of countries reported that they had undertaken such measures. Often they cover endangered species in general rather than being specifically focused on pangolins. A smaller number of African and Asian range States have also specific programmes in place for awareness raising about pangolins.

Other sources of information

18. In addition to the replies to the questionnaire, the Working Group has also considered the information provided in the report from the above mentioned range States meeting held in Vietnam, and takes note of the recommendations made therein.
19. Finally, the Working Group has taken note of the data on legal trade in pangolins provided by UNEP-WCMC, as well as of the information provided in the IUCN Red List Assessment

Recommendations

20. Based on the above-mentioned sources of information, the Working Group makes the following recommendations for consideration at the 66th meeting of the CITES Standing Committee:
 - The SC should encourage additional range and consumer States to provide their response to the questionnaire;

- The 17th meeting of the Conference of the Parties should adopt a resolution on the conservation of and trade in pangolins, based on a draft to be developed at the 66th meeting of the Standing Committee which should take into account the recommendations set out under a) to f) below. A draft for the chapeau of such a resolution is attached in the Annex to this report.
- The Working Group notes that these recommendations are based on the eight pangolin species remaining in Appendix II (with a zero quota for export from the wild for the four Asian species). If some of all of the species are transferred to Appendix I at CoP17, these recommendations would need to be adjusted accordingly.

a) General support

- All governments, intergovernmental organizations, international aid agencies and non-governmental organizations, as a matter of urgency, should assist the range, transit and consumer States in any way possible in fighting the illegal trade in pangolins including through the provision of technical assistance and funding.

b) On monitoring and management

- Range States should work with appropriate bodies to put in place robust systems for *in situ* monitoring of pangolin populations, making use, for example, of standardized tools under development by the IUCN Pangolin Specialist Group for reliably estimating pangolin populations;
- Parties should develop and implement programmes to provide training and capacity building on methods of determining the species of pangolin in trade and species or source of seized specimens, including from alleged captive breeding operations;
- The Secretariat, subject to available funding, should prepare at least six months before each meeting of the CoP a report in cooperation with relevant organisations, such as IUCN, TRAFFIC and UNEP-WCMC on:
 - the national and global conservation status of African and Asian pangolin species;
 - levels of legal trade in specimens of live and dead pangolins and derivatives;
 - stockpiles of specimens and derivatives of pangolins and stock management, including existing registration systems;
 - available information about levels of legal and illegal trade including data from Parties biennial reports;
 - relevant information on enforcement measures taken, including seizures, arrests, prosecutions and judgments relating to illegal trade in pangolins;
 - inventory of current captive pangolin populations in zoos, rehabilitation and other facilities and new developments on captive breeding activities; and
 - new developments regarding specific demand management, education and awareness raising measures for pangolins.

The Secretariat should distribute the report to range and implicated States for any comments. On the basis of the report and the comments received from the range and implicated States, the Secretariat should formulate recommendations and draft decisions for consideration by the Conference of the Parties as appropriate.

c) On legislation, enforcement and site based protection

- Parties should adopt and implement or, where applicable, review existing legislation and penalties applicable to offtake and trade in pangolins and strengthen legislation where appropriate;

- Range States should fully protect all species of pangolin under national law, thereby removing disparities regarding the enforcement between native and non-native species to decrease cross-border laundering of pangolin species and derivatives;
- Parties should make DNA samples available to researchers to facilitate a better understanding of illegal pangolin trade dynamics;

d) *On Stockpile management*

- Parties possessing stocks of parts and derivatives of pangolins should consolidate and ensure adequate registration and control of such stocks;

e) *On captive breeding*

- Pangolin breeding and rescue facilities should be encouraged to adopt a breeding registration system, preferably based on genetic standards to prove lineage;
- Pangolin breeding facilities should be able to demonstrate the legal origin of any founder stock
- Parties with pangolin breeding facilities are urged to ensure that such facilities have in place effective management practices and controls to prevent parts and derivatives from entering illegal trade;

f) *On awareness raising, education and demand management*

- Consumer and range States should be urged to raise awareness of pangolins and their conservation status and the role of illegal trade in their increasing endangerment, including with all parts of the enforcement chain and the judiciary as well as with relevant business sectors, such as courier companies, and to work for that purpose with all relevant stakeholders, including non-governmental organisations;
- Range States should work with local communities to develop non-consumptive livelihood programs and educational programs and material;
- Consumer States should take measures to reduce the demand for pangolin parts and derivatives, including through research on consumers and their motivations for consumption of pangolin parts and derivatives, and interventions to change consumer behaviour including through targeted communication campaigns

Draft resolutions for consideration at CoP17

Chapeau

CONCERNED that all eight species of pangolin are threatened with extinction,

RECALLING that the Conference of the Parties amended the Appendices of the Convention in 1994 and included all species of pangolins in Appendix II, and that a zero annual export quota was established for *Manis crassicaudata*, *M. culionensis*, *M. javanica* and *M. pentadactyla* for specimens removed from the wild and traded for primarily commercial purposes in 2000;

CONCLUDING that the above measures have not prevented declines in pangolin populations;

COMMENDING the efforts made by some Parties to address the illegal trade in pangolins;

CONSCIOUS that stocks of pangolin scales continue to accumulate in some countries;

RECOGNISING that pangolin populations are difficult to estimate;

CONCERNED that high levels of international demand for pangolins and their meat and scales exists and that financial incentives to collect and illegally trade in pangolins are very high;

RECOGNISING that in recent years the illegal trade in pangolins and their meat and scales has become a global law enforcement problem, and therefore RECALLING that, in Resolution Conf 11.3 (Rev CoP16), the Conference of the Parties has agreed on a number of recommendations to strengthen compliance and enforcement,

RECOGNISING, however, also that an emphasis solely on law enforcement has failed to remove the trade threat to pangolins and that therefore more comprehensive efforts will be needed, including on demand management, education and awareness raising, involvement of local communities and conservation organisations,

RECALLING that, in Resolution Conf. 10.7 (Rev. CoP15) on the disposal of confiscated live specimens of species included in the Appendices, the Conference of the Parties urges Management Authorities, in consultation with Scientific Authorities and other bodies concerned, to develop action plans to deal with seized and confiscated live specimens, and ACKNOWLEDGING the importance of developing such plans for seized and confiscated pangolins,

[to be completed in line with agreed recommendation text]

Overview of Trade in Pangolins

The following overview was prepared for the CITES Working Group on Pangolins by UNEP-WCMC and covers trade in all species of pangolin *Manis* spp. globally over the period 2005-2014. Trade data for 2014 is incomplete, as the deadline for annual report submission is 31st of October 2015. Trade data was extracted from the CITES Trade Database on 26/10/2015. This overview focusses on direct trade, but a summary table of indirect trade is also provided.

Direct Trade

The main pangolin items in direct trade over the period 2005-2014 (all sources and purposes) included derivatives, skins, live animals and scales, with a number of other trade terms also recorded in trade (Table 1).

Table 1: Direct trade in all pangolins by trade term, all sources and all purposes, 2005-2014.

Term (Unit)	Reported by	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
derivatives	Importer		24		68	2396	4502	54				7044
	Exporter											
derivatives (kg)	Importer					0.06	1.785					1.845
	Exporter											
skins	Importer		1	1			1001	269		225		1497
	Exporter											
live	Importer	1	2	11	500	12	2		2			530
	Exporter			27	25	4		24	524	11		615
Specimens	Importer	72	41	212	14	2	1	3	14	17	5	381
	Exporter	9	40	3	13	6	4		1		4	80
specimens (l)	Importer			0.75		1.2				0.0003		1.9503
	Exporter			2.1			0.001					2.101
specimens (kg)	Importer											
	Exporter					0.1						0.1
Medicine	Importer								118	134		252
	Exporter											
scales (kg)	Importer		0.296		0.023				0.594	130		130.913
	Exporter							50	205			255
scales	Importer					9	12	1	61		3	86
	Exporter							20	7			27
leather products (small)	Importer		22	8	3			1				34
	Exporter				1							1
bodies	Importer	1	1	1	1		4	1	7			16
	Exporter					1		1	7			9
bodies (kg)	Importer			2								2
	Exporter											
skulls	Importer			14								14
	Exporter											
skeletons	Importer			10								10
	Exporter											
trophies	Importer				2					2		4
	Exporter			1								1
leather products (large)	Importer			2	2							4
	Exporter											
tails	Importer		1		1		1					3
	Exporter											
meat (kg)	Importer	0.065				2.454		0.428				2.947
	Exporter											
unspecified	Importer						1					1
	Exporter											
unspecified (kg)	Importer	0.062	0.038									0.1
	Exporter											
claws	Importer						1					1
	Exporter											
powder (kg)	Importer						0.014					0.014
	Exporter											

Source: CITES Trade Database, UNEP-WCMC, Cambridge, UK, downloaded on 26/10/2015

Trade in live pangolins over the period 2005-2014 (all sources and purposes) peaked in two years, 2008 according to importers and 2012 according to exporters (Figure 1). These animals were reported to be of

ranch origin (source 'R') in 2008 and of wild-sourced origin (source 'W') in 2012 (Table 2). When confiscated/seized (source 'I') animals are excluded, the main species in trade over this period was *Manis tricuspis*, both as reported by importers and exporters, although peak trade was reported in different years (Figure 2a and b).



Figure 1: Direct trade in live pangolins, 2005-2013 (all sources and all purposes), as reported both by importers and exporters.

Table 2: Direct trade in live pangolins by source (all purposes), 2005-2013.

Term	Source	Reported by	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
live	I	Importer			10					2		12
		Exporter									11	11
	R	Importer				500						500
		Exporter				5						5
	W	Importer	1	2	1		12	2				18
		Exporter			27	20	4		24	524		599

Source: CITES Trade Database, UNEP-WCMC, Cambridge, UK, downloaded on 26/10/2015

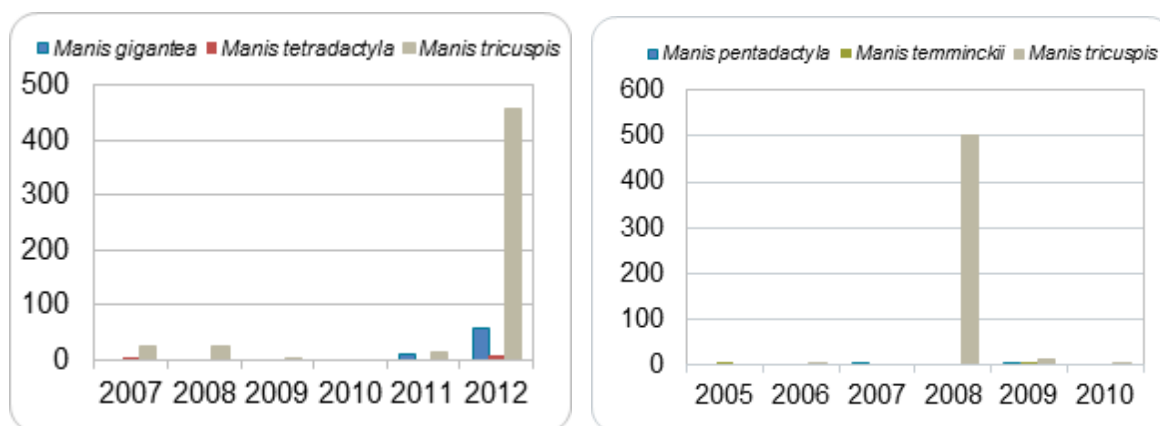


Figure 2: Direct trade in live pangolins in number, by species; all sources excluding source 'I', 2005-2014, as reported by a) exporters (no trade was reported 2005-2006 or 2013-2014) and b) importers (no trade was reported 2011-2014).

The main country of export of live pangolins 2005-2013 globally was Togo, as reported both by Togo and importers (Figure 3). The main country of import of live pangolins was Italy, as reported by the importer, whereas based on exporter reported trade data, the main importers were the Lao People's Democratic Republic and Viet Nam (Figure 4).

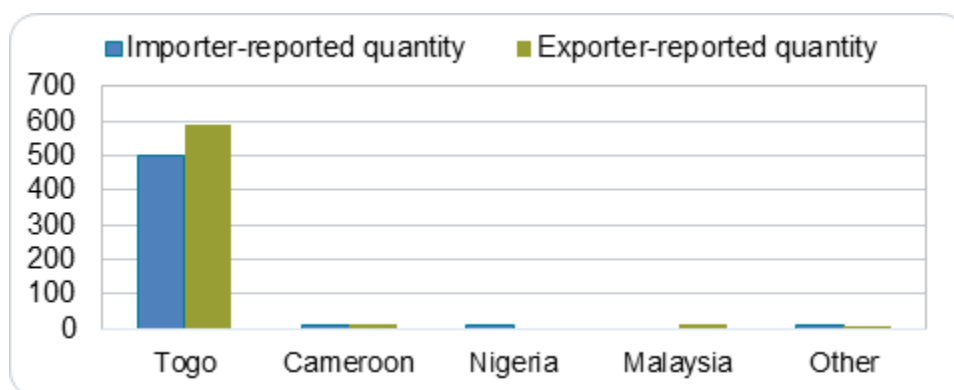


Figure 3: Main countries of export for direct trade in live pangolins, 2005-2013. No trade yet reported for 2014, but 2014 data is incomplete. All purposes and sources.

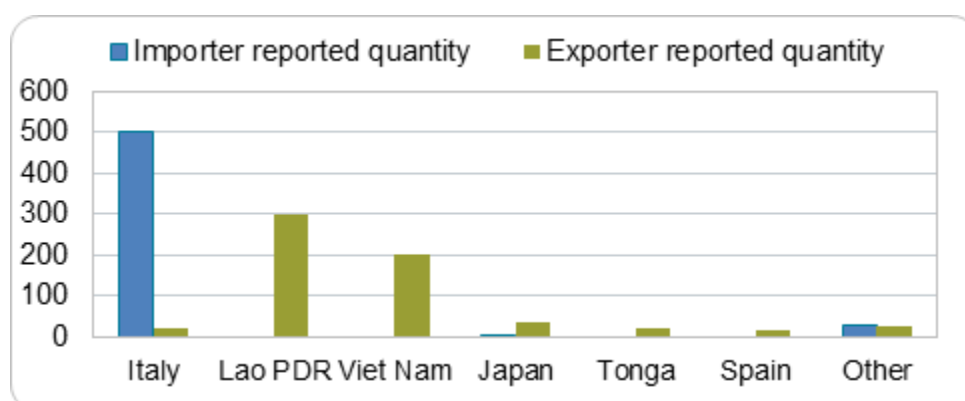


Figure 4: Main countries of import for direct trade in live pangolins, 2005-2013. No trade yet reported for 2014, but 2014 data is incomplete. All purposes and sources.

Wild-sourced pangolin trade over the period 2005-2014 was primarily in skins and specimens, as reported by importers, and in live animals, as reported by exporters (Table 3). The majority of trade reported under source 'I' (confiscated/seized) was in derivatives of *Manis pentadactyla* (Figure 5); this trade was reported by importers only.

Table 3: Direct trade in wild-sourced *Manis* spp. by trade terms, 2005-2014. All purposes.

Term (Unit)	Importer reported quantity	Exporter reported quantity
skins	483	
specimens	367	79
specimens (l)	1.95	2.101
specimens (kg)		0.1
scales (kg)	130	255
scales	48	27
derivatives	24	
live	18	599
skulls	10	
bodies	8	9
trophies	3	1
meat (kg)	0.065	
leather products (small)		1

Source: CITES Trade Database, UNEP-WCMC, Cambridge, UK, downloaded on 26/10/2015

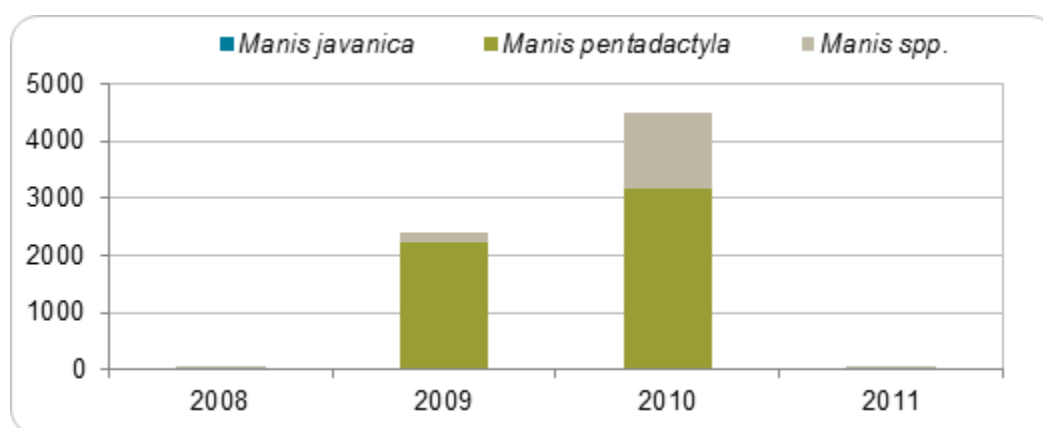


Figure 5: Direct exports of source 'I' (confiscated/seized) pangolin derivatives in number, by taxon, as reported by importers 2008-2011. No trade in source I derivatives was reported 2005-2007 or 2012-2014.

Indirect Trade

The main pangolin items in indirect trade (reported as re-exports) over the period 2005-2014 (all purposes) included confiscated/seized (source 'I') derivatives and wild-sourced (source 'W') scales, with a number of other trade terms also recorded in trade (Table 5).

Table 5. Indirect trade in pangolins, by trade term (all sources and all purposes), 2005-2014. No indirect trade reported for 2014; 2014 data is incomplete.

Source	Term (unit)	Purpose	Reported by	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total	
C	specimens	S	Importer											
			Exporter								109		109	
I	derivatives	P	Importer			98	121	16951	2025	74			19269	
			Exporter											
		T	Importer			281	324	65	465	25				1160
			Exporter											
	derivatives (kg)	P	Importer				0.08		2				2.08	
			Exporter											
	scales	P	Importer	5						2	231	155	393	
			Exporter											
		T	Importer					50						50
			Exporter											
	scales (kg)	L	Importer											
			Exporter				0.0122							0.0122
		P	Importer					0.409		0.14		0.762		1.311
			Exporter											
	medicine	P	Importer								194	32	226	
			Exporter											
		T	Importer									30		30
			Exporter											
	medicine (kg)	P	Importer								1.466		1.466	
			Exporter											
	skins	E	Importer				2						2	
			Exporter				4							4
		T	Importer	1							100			101
			Exporter											
	specimens	L	Importer		100								100	
			Exporter											
	leather products (small)	P	Importer		4	15		3	12	12	4		50	
			Exporter											
		T	Importer									6		6
			Exporter											
	skin pieces	P	Importer	24	1							5	30	
			Exporter											
		T	Importer									1		1
			Exporter											
	meat	P	Importer						4				4	
			Exporter											
	bodies	E	Importer											
			Exporter									1		1
O	bodies	E	Importer											

Source	Term (unit)	Purpose	Reported by	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
			Exporter							1			1
		Q	Importer							1			1
			Exporter							1			1
		T	Importer										
			Exporter	1									1
	scales	Q	Importer			1							1
			Exporter		1								1
	garments	T	Importer									1	1
			Exporter									1	1
	carvings	Q	Importer										
			Exporter			1							1
		T	Importer										
			Exporter	1									1
	claws	T	Importer										
			Exporter									1	1
R	skins	T	Importer									10	10
			Exporter										
U	skins	E	Importer				2						2
			Exporter										
	leather products (small)	P	Importer	2									2
			Exporter										
	specimens	S	Importer										
			Exporter						18				18
	bodies	E	Importer										
			Exporter									2	2
W	scales (kg)	T	Importer						1500		800		2300
			Exporter					1000	1000		800		2800
	skins	T	Importer									325	325
			Exporter									225	225
	specimens (kg)	S	Importer				14						14
			Exporter										
	specimens	S	Importer								5		5
			Exporter					1			5		6
	specimens (l)	S	Importer				1.2						1.2
			Exporter										
	leather products (small)	P	Importer	7	3								10
			Exporter										
		T	Importer										
			Exporter						1				1
	derivatives	P	Importer		5								5
			Exporter										
	skin pieces	T	Importer										
			Exporter							50			50

Source: CITES Trade Database, UNEP-WCMC, Cambridge, UK, downloaded on 26/10/2015