

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



Sixty-ninth meeting of the Standing Committee
Geneva (Switzerland), 27 November – 1 December 2017

Species specific matters

PANGOLINS (*MANIS* SPP.)

1. This document has been prepared by the Secretariat.
2. At the 17th meeting of the Conference of the Parties (CoP17, Johannesburg, 2016), all eight species of pangolin were transferred from CITES Appendix II to Appendix I. The Parties also adopted Resolution Conf. 17.10 on *Conservation of and trade in pangolins*,¹ and Decisions 17.239 and 17.240 on *Pangolins* (*Manis spp*), as follows:

Directed to the Secretariat

17.239 *The Secretariat shall:*

- a) *Liaise with the International Consortium on Combating Wildlife Crime (ICWC) partner agencies and regional enforcement networks, such as the Lusaka Agreement Task Force (LATF), South Asia Wildlife Enforcement Network (SAWEN) and the Association of Southeast Asian Nations Wildlife Law Enforcement Network (ASEAN-WEN), and other relevant enforcement networks to convey the concerns expressed in Resolution Conf. 17.10, on Conservation of and trade in pangolins, including parts and derivatives, and to request them to take these into account when developing work programmes;*
- b) *subject to external funding, prepare in cooperation with relevant organizations, and in consultation with range and implicated States, at least two months before the 69th meeting of the Standing Committee, a report on:*
 - i) *the national and global conservation status of African and Asian pangolin species;*
 - ii) *available information about levels of legal and illegal trade;*
 - iii) *relevant information on enforcement actions taken, including seizures, forensic analysis of seized specimens, arrests, prosecutions and judgments relating to illegal trade in pangolins as well as disposal of seized specimens;*
 - iv) *stock-piles of specimens and derivatives of pangolins and stockpile management including existing registration systems;*
 - v) *inventories of current captive pangolin populations, including breeding data and mortality rates, in zoos, rehabilitation centres and other captive facilities and new developments on captive-breeding activities; and*

¹ <https://www.cites.org/sites/default/files/document/E-Res-17-10.pdf>

- vi) *new developments regarding specific demand management, education and awareness-raising measures concerning pangolins.*

17.240 *The Secretariat shall distribute the report in draft to range and implicated States for any comments. The final report shall be made available to the Standing Committee at its 69th meeting. On the basis of the report and the comments received from the range and implicated States, the Secretariat shall formulate recommendations for consideration at the 69th meeting of the Standing Committee, as well as draft decisions for consideration by the Standing Committee and the Conference of the Parties, as appropriate.*

Implementation of Decision 17.239, paragraph a)

3. In September 2016, the Secretariat issued CITES Alert No.50 on *Illegal trade in pangolins*, highlighting the urgent need for enhanced enforcement action to address this illegal trade. The Alert, a restricted document intended for law enforcement use only, was made available in English prior to CoP17, and was after CoP17 also made available in French and Spanish. The Secretariat directly shared the Alert with all Parties significantly affected by the illegal trade outlined in it (China, Hong Kong Special Administrative Region of China (Hong Kong SAR), Indonesia, Kenya, the Netherlands and Nigeria) and with INTERPOL, the United Nations Office on Drugs and Crime (UNODC), the World Customs Organization (WCO) including its Regional Intelligence Liaison Offices (RILO), the UNODC-WCO Container Control Programme, and Europol, as well as with regional wildlife enforcement networks at various enforcement meetings and workshops. The Alert was also shared through enforcement platforms such as WCO ContainerComm, WCO Environet, EU-TWIX, and Africa-TWIX.
4. To implement Decision 17.239, paragraph a), the Secretariat conveyed the concerns expressed in Resolution Conf. 17.10 on *Conservation of and trade in pangolins*, to ICCWC partner agencies, Regional Enforcement Networks, and others, at a number of events,² and requested these entities to take them into account when developing their work programmes. Illegal trade in pangolins was also addressed in a video statement by the CITES Secretary-General at the 4th Regional Dialogue on Combating Trafficking in Wild Fauna and Flora, held in Bangkok, Thailand, in September 2017.³ This meeting, which focused in particular on combating illegal trade in pangolins, tigers, ivory, rhinoceros horn and Siamese rosewood, developed a set of recommendations which will serve as guidance in the development of the Plan of Action for the ASEAN working group on CITES and wildlife enforcement (2016-2020), with a particular focus on collaboration between countries.
5. The Secretariat has also been informed by the Lusaka Agreement Task Force (LATF) that transnational crime, including crimes involving pangolins, is a top priority in the LATF enforcement programme. As a result, LATF in May 2017 successfully coordinated a joint transnational intelligence-led operation between the United Republic of Tanzania and Uganda leading to the arrest and deportation of a suspect who is believed to be the mastermind behind the smuggling of six tons of pangolin scales seized in October 2016 in the United Republic of Tanzania. In total, 10 suspects linked to the case were arrested and the investigation was ongoing at the time of writing. Prominence has also been given to the protection of pangolins during capacity-building programs initiated or supported by LATF among its member States. The South Asian Wildlife Enforcement Network (SAWEN) also informed the Secretariat that pangolins has been included in its work plan.
6. Since CoP17, several enforcement activities have taken place to combat illegal trade in pangolins. A global operation to address wildlife crime codenamed 'Operation Thunderbird'⁴ was initiated by the INTERPOL wildlife crime working group and coordinated by ICCWC, in close cooperation with Environment Canada, the UK Border Force and the US Fish and Wildlife Service. The operation, which took place from 30 January

² Concerns expressed in Resolution Conf. 17.10 were addressed at following meetings: the 27th meeting of the INTERPOL wildlife crime working group in Johannesburg, South Africa, in October 2016; the 3rd meeting of the South Asia Wildlife Enforcement Network (SAWEN) meeting in Dhaka, Bangladesh, in October 2016; the ICCWC Senior Experts Group Conference Call in October 2016, the 33rd meeting of the European Union Wildlife Trade Enforcement Group meeting in Brussels, Belgium, in November 2016; the 4th Steering Committee meeting of the Horn of Africa Wildlife Enforcement Network (HAWEN) in Addis Ababa, Ethiopia, in December 2016 (which the Lusaka Agreement Task Force attended); and at the 13th meeting of the ASEAN working group on CITES and wildlife enforcement (which now includes the former ASEAN-WEN) in Parapat, Indonesia, in April 2017.

³ https://cites.org/eng/news/CITES_SG_remarks_4th_Regional_Dialogue_on_Combating_Trafficking_in_Wild_Fauna_and_Flora_Bangkok_Thailand_11092017

⁴ See SC69 document on International Consortium on Combating Wildlife Crime and <https://www.interpol.int/News-and-media/News/2017/N2017-022>

to 19 February 2017 and involved police, customs, border agencies, environment, wildlife and forestry officials from 45 countries and territories, resulted in the seizure of more than 3.9 tons of pangolin scales. Another enforcement activity is “Operation Save REP” (Rhinos, Elephants and Pangolins), initiated under the auspices of the WCO Project INAMA. The operation took place in July 2017 and focused on commercial air cargo and travellers, international mail and courier packages. It was a follow-up activity to a training on operational planning for customs administrations in Sub Saharan African countries held in May 2017, in Namibia. The operation involved the WCO RILO East and Southern Africa (RILO ESA), Angola, Botswana, Ghana, Malawi, Mozambique, Namibia, Nigeria, Uganda, Zambia and South Africa (the latter not funded under the INAMA Project). In total, approximately 70 kg of pangolin scales were seized during this operation. The Secretariat encourages Parties to continue to enhance enforcement efforts aimed at addressing the illegal trade in pangolin specimens in accordance with Resolution Conf. 17.10, and to take these into account when developing work programmes at national and regional level. The Secretariat will also continue its work in accordance with the provisions of Decision 17.239, paragraph a).

Fraudulent permits for pangolin specimens

7. In 2016 and 2017, the Secretariat received several enquiries from Parties regarding permits for pangolin specimens, suspected to be fraudulent. This related mainly to exports from the Democratic Republic of the Congo (DRC) (nine permits involving 10,650 kg of scales of *Manis gigantea*, *Manis tricuspis*, and *Manis* spp. for export to China, Hong Kong SAR and Lao People’s Democratic Republic (PDR)); from Burundi (five permits involving 6,500 kg of scales of *Manis gigantea* for export to Hong Kong SAR); and from Nigeria (one permit involving 15,000 kg of pangolin scales to China). Regarding the permits from the DRC, seven of the export permits involving 5,650 kg pangolin scales, were confirmed to be fraudulent, and as a consequence the Secretariat recommended to the Parties concerned not to accept these documents. The Secretariat reports in more details on this in document SC69 Doc. 29.2.2 on *Application of Article XIII in the Democratic Republic of the Congo*. Regarding the permits from Burundi, the CITES Management Authority of Burundi confirmed that the permits were valid. However, according to the Red List of Threatened Species of the International Union for Conservation of Nature (IUCN), there are no records of *Manis gigantea* in Burundi (Kingdom *et al.* 2013). The Secretariat therefore requested the Management Authority of Burundi to provide further clarification about the issuance of the permits. The explanation provided by Burundi did not clarify the legal acquisition of the specimens covered by the permits and, as a consequence, the Secretariat was not in the position to recommend the acceptance of the documents. Furthermore, the permit from Nigeria was confirmed to be fraudulent, and the importing Party was advised not to accept the document.
8. In light of the above, the Secretariat encourages all Parties to treat any CITES permits or certificates authorizing trade in pangolin specimens with caution, and to confirm the authenticity and validity of such documents with the CITES Management Authority of the Party concerned and the CITES Secretariat. Parties presented with fraudulent documents are requested to inform the Secretariat, and to initiate investigations to identify and take action against the alleged perpetrators of the related offences.

Implementation of Decisions 17.239, paragraph b) and 17.240

9. To implement Decisions 17.239, paragraph b) and 17.240, the Secretariat contracted the International Union for Conservation of Nature (IUCN) to prepare, in cooperation with relevant organizations and in consultation with range and implicated States, a report on: (i) the national and global conservation status of African and Asian pangolin species; (ii) available information about levels of legal and illegal trade; (iii) relevant information on enforcement actions taken; (iv) stock-piles of specimens and derivatives of pangolins and stockpile management; (v) inventories of current captive pangolin populations; and (vi) new developments regarding demand management, education and awareness-raising measures concerning pangolins. The Secretariat expresses its sincere appreciation to the United States of America for the funding it provided for the implementation of these Decisions.
10. In consultation with the Secretariat, IUCN developed a questionnaire to collect data as outlined in Decision 17.239, paragraph b), from Parties. The Secretariat made this questionnaire available as an Annex to Notification to the Parties No 2017/035⁵ of 1 May 2017, inviting Parties to complete the questionnaire and to submit it to IUCN. Range States and implicated Parties were also contacted by IUCN directly.
11. IUCN received responses from 37 Parties comprising eight from African pangolin range States (Angola, Central African Republic, Côte d'Ivoire, Kenya, Liberia, Namibia, Nigeria and Senegal), nine from Asian pangolin range States (Cambodia, India, Indonesia, Lao PDR, Malaysia, Nepal, Pakistan, the Philippines

⁵ <https://cites.org/sites/default/files/notif/E-Notif-2017-035.pdf>

and Thailand), and 20 from non-range States (Austria, Bahrain, Bulgaria, Comoros, Denmark, Finland, France, Georgia, Greece, Ireland, Japan, Monaco, Montenegro, the Netherlands, Spain, Sweden, Switzerland, Tunisia and the United States of America, as well as the European Union). IUCN also reviewed responses from Parties, to the questionnaire developed by the CITES Standing Committee intersessional working group on pangolins (see Notification to the Parties No. 2014/059⁶ of 8 December 2014). This enabled the inclusion of responses from a further 23 Parties (Bangladesh, Benin, Bhutan, Botswana, Brunei Darussalam, Cameroon, Chad, China, Côte d'Ivoire, Gabon, Ghana, Italy, Latvia, Myanmar, Singapore, Slovakia, South Africa, Togo, Uganda, United Republic of Tanzania, Viet Nam, Zambia, and Zimbabwe).

12. IUCN reviewed information submitted by a total of 61 Parties and consulted with ICCWC partners, other experts and organizations, to prepare the report for the present meeting. It also conducted a review of relevant scientific literature, trade data on pangolins obtained from the CITES Trade Database, seizure data obtained from the UNODC World WISE database, as well as of information requested from international conservation organizations, to inform respective sections of this report. The IUCN also gathered information on illegal trade in pangolins that took place between 2014 and 2017 from open sources.
13. On behalf of the Secretariat, IUCN shared the draft report with all pangolin range States and implicated States for comments, as required by Decision 17.240. Feedback was received from Angola, Bangladesh, Cambodia, France, Gabon, Japan, Malaysia, the Philippines, Sudan, Thailand, the United States of America and Viet Nam. The Secretariat also provided comments on the draft report, and IUCN incorporated the feedback received from Parties and the Secretariat into the final report. The Secretariat would like to thank all Parties and organizations that contributed information for the report.
14. The executive summary of the final report, available in English, French and Spanish, is presented in Annex 1 to the present document. The full report is, due to the limited funding that was available to the Secretariat for translation purposes, available in English and French only. The full report is made available to the present meeting in accordance with the provisions of Decision 17.240, as Annex 2 to the present document.
15. The Secretariat draws the attention of the Standing Committee to the following findings in the report, and also offers some observations.

National and global conservation status of African and Asian pangolin species

16. Information on the national and global conservation status of African⁷ and Asian⁸ pangolins contained in the report is too elaborate to summarize in the present document, and Parties are invited to consult the report for more information. It should however be noted that the majority of range States that provided information relating to the conservation status of pangolins reported that populations are data deficient or in decline. Only Brunei Darussalam reported that its population is increasing. The report concludes that there remains little quantitative information of the status of pangolins at the local, national and international level.
17. The report highlights that high levels of offtake, research into the trade and trafficking of pangolins, and shifting in trade trends, support the assertion that pangolin populations are declining. It further states that there is considerably less information available about the status of African pangolin species compared to the Asian species. In light of the fact that the majority of African range States that responded consider their pangolin populations to be data deficient or in decline, combined with the fact that illegal trade in pangolins is increasingly affecting pangolin populations in Africa, it seems essential that pangolin range states in Africa that have not yet done so, develop and implement *in situ* pangolin management and conservation programmes, which includes population assessments, as anticipated by Resolution Conf. 17.10, paragraph 7. It is also important that range states in Asia build upon the work already done, to further enhance data, management and conservation measures.
18. The IUCN Species Survival Commission's Pangolin Specialist Group reported that it is supporting range States of *M. javanica* to develop a first Regional Conservation Strategy for this species, known with the common name of Sunda Pangolin⁹. This strategy will focus on site-based protection and engage local communities in pangolin conservation efforts, combatting trafficking, strengthening legal policies, and

⁶ <https://cites.org/sites/default/files/notif/E-Notif-2014-059.pdf>

⁷ *Four pangolin species are native to Africa: the black-bellied pangolin M. tetradactyla, white-bellied pangolin M. tricuspis, giant pangolin M. gigantea and Temminck's ground pangolin M. temminckii.*

⁸ *Four pangolin species are native to Asia: the Chinese pangolin M. pentadactyla, Sunda pangolin M. javanica, Indian pangolin M. crassicaudata and Philippine pangolin M. culionensis.*

⁹ <http://www.pangolinsg.org/2017/07/09/experts-make-first-ever-regional-conservation-strategy-for-sunda-pangolin/>

addressing demand. Similarly, national conservation strategies are currently in development for *M. crassicaudata* and *M. pentadactyla* in Nepal and *M. javanica* in Singapore. Other plans underway include the development of a national conservation strategy for pangolins in Viet Nam and an action plan for *M. pentadactyla* in Hong Kong SAR.

19. The report highlights a number of actions which it suggest needs to be implemented urgently to directly conserve or support the conservation of pangolins, including the following:
 - a) the development of regional and national conservation strategies to guide Parties and other conservation stakeholders on actions to conserve pangolins;
 - b) the development of monitoring methods that can be field tested and evaluated to ensure they are accurate and reliable and can be integrated into conservation management;
 - c) the development of a pangolin trade resource kit with the following components:
 - i) identification materials for pangolins and their derivatives in trade for frontline enforcement staff;
 - ii) standardised protocols for sampling seizures of large volumes of pangolins scales;
 - iii) guidance on the immediate and long-term placement of live animals; and
 - iv) a catalogue of suitable housing facilities for the long-term placement of live pangolins;
 - d) regular analyses of pangolins specimens in illegal trade to inform decision-making, which could be based on illegal trade reports outlined in Resolution Conf. 11.17 (Rev. CoP17) on *National reports* combined with any other available data on illegal pangolin trade;
 - e) determination of priority sites at which to concentrate pangolin conservation efforts, including engagement with local communities; and
 - f) evaluation of whether pangolin farming offers a potential supply-side conservation solution for pangolins or otherwise may exacerbate overexploitation of, and illegal trade in, wild pangolins.

Legal trade in pangolin specimens

20. Prior to CoP17, international legal trade in pangolin specimens primarily involved Asian species and was largely comprised of trade in skins. Between 1977 and 2014, an estimated 509,564 whole skins of Asian pangolins were traded. Almost all of this trade (99%, or 502,383 out of 509,564 whole skins) took place prior to or during the year 2000, when zero export quotas were established for Asian pangolins. There has been comparatively little trade reported in Asian pangolins since 2000.
21. Trade in pangolin scales between 1994 and 2012, is reported to have involved an estimated 53,052 Asian pangolins. A high proportion of this trade took place before the year 2000.
22. The report states that beyond whole skins and scales, international trade in Asian pangolins has involved various other derivatives as presented in Table 1 in the report, but that it is not possible to unambiguously convert these derivatives to numbers of animals. Trade in live animals totalled 1,265 pangolins, and primarily occurred between 1980 and 1989.
23. The report states that, compared to trade in Asian species, little legal trade was reported involving African pangolins. Reported trade involved all four African species, and primarily involved live pangolins and scales. The report also notes significant differences in the quantities of animals reported as traded by exporting and importing Parties, and provides further details on these discrepancies.
24. The report highlights that reported trade in African pangolin scales has occurred only since 2011. Trade in scales of *M. tricuspis* involved 2,010 kg (an estimated 5,576 animals) between 2013 and 2015. All scales were from wild caught animals and were traded for commercial purposes. This mainly comprised the import of 1,950 kg of scales to China from the Congo (1,000 kg in 2015) and the Democratic Republic of the Congo (950 kg in 2014-2015). It also involved the import of 60 kg of scales into Hong Kong SAR from Togo in 2013 (though Togo reported the export of only 30 kg). Reported trade in *M. gigantea* scales involved 3,268.14 kg of scales (an estimated 908 animals) based on importer reported quantities. The majority of this trade is

accounted for by the import to China of 3,198 kg of scales from Uganda in 2014 (Uganda reported exports of 3,211 kg). All scales were from wild caught animals and traded for commercial purposes.

25. Trade in other derivatives of African pangolins has involved, *inter alia*, bodies, skins, and other specimens, as presented in Table 2 in the report.

Illegal trade in pangolin specimens

26. Data on illegal trade in pangolins were compiled from information about seizures provided by 40 Parties in their responses to Notification to the Parties No. 2017/035 and No. 2014/059, as well as data provided by UNODC from their World WISE database. The report concludes that available information on illegal trade dynamics demonstrates that illegal pangolin trade involves, or at least implicates, 55 Parties,¹⁰ including African and Asian range States and non-range States.
27. Based on the datasets used to compile the report, a total of 1,557 seizures involving an estimated 192,576 pangolins took place between 1999 and 2017. Data reflects that illegal trade in pangolins significantly escalated in recent years, with the majority of these seizures (approximately 94%), having taken place from 2007 onward¹¹. This illegal trade involved all eight pangolin species, but was mainly recorded as *Manis* spp., owing to the fact that reports on seizures of pangolins and their derivatives infrequently report the species involved. The report states that it appears that this is because of a lack of capacity among enforcement personnel to correctly identify species and derivatives in trade to that level. Where the specimens were identified to species level, based on trade volumes, *M. javanica* was the species most frequently seized between 1999 and 2017.
28. Illegal trade in pangolin specimens mainly involved live and dead pangolins (48%) and scales (48%), with much less trade in meat (4%) and other derivatives (< 1%) by volume¹².
29. Illegal trade in live and dead animals involved an estimated 91,958 pangolins between 1999 and 2017. Virtually all of this trade (99%) is accounted for by trafficking in *Manis* spp. (58%, an estimated 53,443 pangolins) and *M. javanica* (41%, an estimated 38,008 animals). The trafficking of live and dead pangolins mainly occurs within Asia, and the dynamics of this trade are discussed in the report.
30. Illegal trade in pangolin scales involved an estimated 91,899 pangolins between 1999 and 2017. Like seizures of live and dead pangolins, the majority of this trade (64%, an estimated 58,484 pangolins) reportedly comprised *Manis* spp. as most seizure reports did not record the species involved. The trafficking of scales involves multifaceted trade routes and countries in Africa, Asia, the Americas, Europe, and Oceania, and the dynamics of this trade are discussed by geographic region in the report.
31. Worth noting is that seizures in Asia accounted for the majority of illegal trade in *Manis* spp. scales by volume (90%, an estimated 52,835 pangolins), and Asia acted as both a source for scales trafficked within the region and as a destination for scales trafficked from a range of African countries. Illegal trade involving scales from specific species of African pangolins in substantial volumes included *M. gigantea* and *M. tricuspis*. This included 6,115 kg of *M. gigantea* scales (an estimated 1,697 animals)¹³. The report states that the biggest trend in pangolin trafficking in recent years has been the emergence of intercontinental trafficking of pangolin scales from Africa to Asian markets.
32. Seizures made in Europe involving *Manis* spp. scales between 2009 and 2017 (though data are incomplete for 2017) indicate that it acts as a thoroughfare for trafficking scales from Africa to Asia, though low quantities of scales were also destined to European countries.
33. In particular worth noting is the information obtained from other sources on a number of very large seizures of scales that have taken place between 2014 and 2017, highlighted in the report. These seizures involved

¹⁰ Belgium, Benin, Cambodia, Cameroon, Central African Republic, China (including Hong Kong SAR), Congo, Côte d'Ivoire, Democratic Republic of the Congo, Equatorial Guinea, Ethiopia, France, Gabon, Ghana, Germany, Guinea, India, Indonesia, Japan, Italy, Kenya, Lao PDR, 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

¹¹ See Figure 13 in the report.

¹² See Figure 15 in the report.

¹³ See Figure 18 in the report.

scales from an estimated 86,000 pangolins, and include the seizure of more than three tons of scales in Hong Kong SAR in two shipping containers from Uganda in 2014, the seizure of 12.3 tons of scales from Nigeria in three shipments, two in Hong Kong SAR (two tons in 2015 and 7.2 tons in 2017) and one shipment in China (3.1 tons in 2016), the seizure of four tons of scales in Hong Kong SAR in 2016 that had originated from Cameroon, the seizure of 712 kg of scales in Malaysia that arrived in two shipments, one from Ghana and a second from the DRC, three tons of pangolin scales seized in Côte d'Ivoire in 2017¹⁴, which open source information suggests originated from the Côte d'Ivoire, Burkina Faso and Liberia, and the seizure of five tons of pangolin scales in Malaysia in 2017, believed to have originated from Nigeria¹⁵. These seizures are commendable and shows that good enforcement work is being done. The size of these illegal consignments however give cause for great concern, and the Secretariat believes that it is essential to take action in particular at the point of origin, to address this illegal trade.

Enforcement actions taken by Parties

34. The report shows that Parties continue to seize large quantities of pangolin scales, after the up-listing of all pangolin species to Appendix I, which entered into force on 2 January 2017.
35. It is important to note that the report states that the most common impediment to compliance with national legislation in terms of illegal trade in pangolins reported by Parties is the lack of sufficient materials to correctly identify different pangolin species and their derivatives. The report concludes that there is a need to develop identification manuals for the different species of pangolins and their derivatives in legal and illegal trade to assist front line enforcement staff.
36. The report further provides information on a number of law enforcement best practices reported by Parties, mainly pangolin range States, to address poaching, illegal trade and other illegal activities involving pangolins. Parties affected by illegal trade in pangolins are encouraged to take note of these best practices, and to endeavour to, as appropriate, implement similar measures at national level to address the poaching of and illegal trade in pangolin specimens.
37. The report also highlights a number of key enforcement challenges in combatting illegal trade in pangolins, as identified by those range States in Africa and Asia that provided responses. These include the lack of equipment and resources (e.g., scanners, sniffer dogs) to detect pangolin derivatives being trafficked, the lack of capacity among enforcement personnel to identify pangolins and their parts and derivatives, and the lack of conversion parameters to reliably determine the number of pangolins associated with the quantity of scales seized, in particular where penalties that can be imposed relate to the number of pangolins involved in trafficking cases and national legislation demands that such information be provided.
38. High prices being offered to local community members for pangolins, which provides a strong incentive for poaching, was highlighted as an enforcement challenge, in particular by Parties in Asia. In this regard, paragraphs 5 and 8 of Resolution Conf. 17.10 seem to be particularly relevant. Parties affected in this manner are encouraged "to work with local communities to develop non-consumptive livelihood programmes and educational programmes and material to assist local communities in sustainably managing pangolin populations" (paragraph 5). Similarly, Parties, governmental, inter-governmental and non-governmental organizations and others are encouraged to, where possible, "support the efforts of range, transit and consumer States concerned with the illegal trade in pangolin specimens, including parts and derivatives, in tackling this trade, including through the provision of capacity-building interventions, technical assistance, operational support, funding support, educational interventions, and law enforcement support and cooperation" (paragraph 8).

Forensic analysis

39. Eight Parties reported that they have facilities able to carry out forensic analysis on seized pangolin specimens (Kenya, India, Malaysia, Nepal, the Netherlands, the Philippines, Switzerland and the United States of America). Only five Parties indicated that they have conducted forensic analyses on pangolin specimens, but no information was provided on the frequency with which such analyses were carried out.

¹⁴ <http://www.herald.co.zw/authorities-seize-3-tons-of-pangolin-scales-in-cote-divoire/>

¹⁵ <http://www.thesundaily.my/news/2017/09/08/sabah-customs-seizes-elephant-tusks-pangolin-scales-worth-rm805m>

40. Although not included in the report, South Africa informed the Secretariat in 2016 that its National Zoological Gardens is able to conduct analyses for *Manis temminckii*, if needed. This information was shared by the Secretariat through Environet on 1 September 2016.
41. Five Parties (Indonesia, Kenya, Malaysia, the Philippines and the United States of America) provided information on the use of forensic applications in the context of pangolins, and this is elaborated upon in paragraph 7.5 of the report.
42. One challenge identified in the context of forensic analyses is that there is currently no standard protocol for sampling large scale seizures of pangolin specimens. The development of such a protocol could support the implementation of Resolution Conf. 17.10, paragraph 1 e).

Arrests, prosecutions and judgements

43. Annex 2 to the report provides detailed information on Parties' legislation, as it relates to pangolins.
44. Information provided by Parties shows vast differences in the penalties that can be imposed for poaching and illegal trade in pangolins. This varies from fines amounting to USD 6 in one country to USD 880 000 in another, or prison sentences ranging from 14 days in one country to life imprisonment in another.
45. The Secretariat notes that, while available information shows that a number of Parties have legislation in place to regulate international trade in native and non-native species of African and Asian pangolins, as applicable, significant room for improvement continues to exist with regards to non-native species, and several Parties in both Africa and Asia currently do not regulate international trade in non-native species of pangolins as anticipated in paragraph 1 a) of Resolution Conf. 17.10. The Secretariat further notes the importance that Parties affected by illegal trade in pangolins, where legislation that makes provision for deterrent penalties are not yet in place, take urgent steps in accordance with paragraph 1 a) of Resolution Conf. 17.10, to adopt and implement such legislation.
46. The report states that information provided indicates that arrests and prosecutions are taking place in a number of countries, but that for others, despite the fact that seizures appear to take place with some frequency, no further information was provided on arrests, prosecutions, convictions and associated penalties.¹⁶

Stockpiles of specimens and derivatives of pangolins and stockpile management

47. Nineteen Parties reported that they have stockpiles of pangolin specimens.¹⁷ These stockpiles range in size from a few museum specimens in one country, to more than six tons of scales in another. In addition to what is contained in the report, as reported in document SC69 Doc. 29.2.2 on *Application of Article III in the Democratic Republic of the Congo*, the Secretariat invited the Management Authority of the DRC in June 2017, to provide information on any existing pre-convention stocks of pangolin scales in the DRC. The Management Authority communicated a preliminary estimation of a stock of approximately 13 to 14 tons of dried pangolins scales in the country.
48. The IUCN report suggests that China has large stockpiles of pangolin scales, but notes that the size of these stockpiles are unknown. It states that the Chinese government between 2009 and 2016 released on average approximately 26 tons of pangolin scales per year on to a legal market in the country. These scales are permitted for clinical use in 716 designated hospitals, providing they are certified (indicated by the presence of a sticker on the packaging), and for the manufacturing of patented Chinese medicines. It is reported that over 200 pharmaceutical companies are licenced to produce more than 60 types of medicines containing pangolin. Table 2 in Annex 2 to the report shows that the acquisition and utilization of Chinese pangolins from the wild in any form is forbidden in China since 2007, and that provisions have been in place since 2008 to strictly control and manage pangolin scale stockpiles. China reported that, according to Chinese law, only trade in and transport of pangolins requires permits, issued by domestic authorities, while private use does not require such permission.

¹⁶ See Table 11 in the report.

¹⁷ See Table 13 in the report.

49. To monitor international trade in any stocks of pangolin specimens that were legally obtained in accordance with the provisions of the Convention prior to the transfer of all pangolin species to Appendix I at CoP17,¹⁸ the Standing Committee may wish to recommend that Parties declare such stocks to the Secretariat prior to authorizing any commercial trade in it, and provide scanned copies of any permits or certificates issued to authorize such trade to the Secretariat. The Standing Committee may further wish to recommend that Parties do not accept any permits or certificates issued for stocks that were obtained in accordance with the provisions of the Convention prior to the transfer of all pangolin species to Appendix I at CoP17, unless the Secretariat verifies that such stocks have been declared to it and that the permit or certificate issued was provided to the Secretariat.
50. The large number of seizures made in China (200 seizures between 2005 and 2011) is commendable and shows that a lot of good work to combat illegal trade in pangolin specimens is being done. However, the Party continues to play an important role in the illegal pangolin trade chain and the report indicates that a recent rapid survey of physical and online markets conducted by TRAFFIC suggests that uncertified pangolin scales are sold illegally in China. In light of this, China is encouraged to continuously review trafficking trends, to ensure that the measures implemented to prevent illegal trade in pangolin specimens remain effective and are quickly adapted to respond to any newly identified trends, as well as to carry out capacity-building activities in accordance with paragraph 1 d) iii) of Resolution Conf. 17.10.
51. The report states that 28 of the Parties that provided responses indicated that they have established regulations or standard operating procedures for managing, storing and disposing of confiscated pangolin specimens. More detailed information on this can be found in Table 12 in the report, as well as in Table 4 in Annex 2 to the report. The report however also states that most Parties have not yet put in place such measures, which suggests that much more could be done to strengthen the implementation of Resolution Conf. 17.10, paragraph 3, to put in place adequate control measures to secure such stocks.

Captive pangolin populations

52. Nine Parties reported that they have facilities where pangolins are kept in captivity.¹⁹ China, Indonesia and Singapore are the only Parties that reported pangolins being bred in captivity. No Parties reported pangolins bred in captivity for commercial purposes, but the report suggests that the commercial production or farming of pangolins appears to be developing in some countries.
53. The report states that based on information available in addition to questionnaire responses received from Parties, there are at least 18 zoological institutions in Africa, Asia, Europe and North America that currently hold pangolins in captivity, while a further 22 institutions (e.g., wildlife rescue centres) in Africa and Asia are reported to maintain small numbers of pangolins in captivity.

Demand management, education and awareness-raising measures

54. The report states that little information was provided by Parties on new developments regarding demand management as it relates to illegal pangolin specimens, but that information from other sources indicates that there are activities underway to better understand, and address demand.
55. Eleven Parties provided information on education activities undertaken concerning illegal international trade, poaching, and other illegal activities connected with pangolins, but that there remains a critical need for Parties and other stakeholders to measure the impact of these activities.
56. Twenty-one Parties provided information on awareness-raising activities that have been undertaken concerning the illegal international trade in pangolin specimens, and that information from other sources also demonstrates efforts to raise awareness of pangolins.
57. The report states that there remains a critical need for Parties and other stakeholders working on demand management, education and awareness-raising to measure the impact of their activities and ensure that approaches can be modified where the desired results are not being achieved, or expanded to other locations when demonstrably successful. In this regard, Parties known to be affected by illegal trade in pangolin specimens are encouraged to, as appropriate, introduce or reinvigorate activities as anticipated in paragraph 6 of Resolution Conf. 17.10. This should be done with a particular focus on also gathering

¹⁸ See Resolution Conf. 13.6 (Rev. CoP16) on Implementation of Article VII, paragraph 2, concerning 'pre-Convention' specimens as it applies to the transfer of a species from Appendix II to Appendix I.

¹⁹ See Table 15 in the report.

information on the impact of activities already conducted, so that lessons can be learned and approaches can be adapted or activities expanded as applicable, to achieve maximum impact in implementing behaviour change strategies targeting key groups that drive illegal trade in pangolin meat, scales and other specimens.

Recommendations

58. Decision 17.240 directs the Secretariat to formulate recommendations for consideration by the Standing Committee, as well as draft decisions for consideration by the Committee, and subsequent submission to the 18th meeting of the Conference of the Parties for consideration.
59. The Secretariat recommends that the Standing Committee:
- a) requests all Parties to:
 - i) declare any stocks of pangolin specimens obtained in accordance with the provisions of the Convention prior to the transfer of all pangolin species to Appendix I at CoP17, to the Secretariat before 28 February 2018;
 - ii) provide scanned copies of all permits and certificates issued to authorize trade in such pre-Appendix-I pangolin specimens.;
 - iii) not accept any permits or certificates issued for stocks that were obtained in accordance with the provisions of the Convention prior to the transfer of all pangolin species to Appendix I at CoP17, unless the Secretariat verifies that such stocks have been declared to it and that the permit or certificate issued was provided to the Secretariat;
 - iv) contact the Management Authority of any Party portrayed as having issued a CITES permit or certificate for the export of any pangolin specimens, as well as the Secretariat, to verify the authenticity and validity of such documents; and
 - v) inform the Secretariat if presented with any fraudulent documents involving pangolin specimens;
 - b) encourage all Parties to undertake risk profiling and provide capacity-building interventions to enforcement officers at ports to enable them to better target illegal trade in pangolin specimens, in particular illegal trade in live and dead animals and pangolin scales;
 - c) request the Secretariat to:
 - i) in its implementation of the provisions of paragraph 14 in Resolution Conf. 11.3 (Rev. CoP17) on *Compliance and enforcement*, pay specific attention to illegal trade in pangolin specimens;
 - ii) encourage the World Customs Organization (WCO) to develop a set of risk profiles and indicators to address illegal trade in pangolin specimens, with a particular focus on illegal trade in live animals, the carcasses of pangolins, and pangolin scales; and
 - iii) encourage ICCWC partner agencies to build upon the work already done and to, subject to available resources, support analytical work, targeted investigations, operational information exchange and the development of operational plans, to target and address the criminal networks involved in illegal trade in pangolin specimens, by convening Wildlife Inter-Regional Enforcement (WIRE) and Regional Investigative and Analytical Case Management (RIACM) meetings as appropriate, for key Parties in Africa and Asia, and Parties in other regions significantly affected by illegal trade in pangolin specimens, as identified in the report available in the Annex to document SC69 Doc. 57 on *Pangolins (Manis spp.)*.
60. The Secretariat invites the Standing Committee to consider the following draft decisions, for submission to the 18th meeting of the Conference of the Parties:

Draft decisions:

Directed to all pangolin range States

- 18.A 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 by Resolution Conf. 17.10, paragraph 7.

Directed to the Secretariat

- 18.B 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 experts 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.
- 18.C The Secretariat shall, subject to external funding, commission the development of:
- a) an identification manual for the different species of pangolins and their derivatives in legal and illegal trade, to assist front-line enforcement staff; and
 - b) a CITES pangolin trade resource kit that compiles relevant information and tools to assist in the implementation of Resolution Conf. 17.10, and addresses *inter alia*: i) identification materials for pangolins and their derivatives in the trade for front-line enforcement staff, ii) standardised protocols for sampling seizures of large volumes of pangolin scales; iii) best practice protocols for safe handling, care and rehabilitation; iv) guidance on the immediate and long-term placement of live animals, including release back to the wild of live confiscated pangolins; and v) a catalogue of suitable housing facilities for the long-term placement of live pangolins.
- 18.D The Secretariat shall report on the implementation of decision 18.A to 18.C to the Standing Committee.
- 18.E The Standing Committee shall review the report of the Secretariat, and report the results to the Conference of the Parties at its 19th meeting.