Species specific matters

PANGOLINS (MANIS SPP.)

1. This document has been prepared by the Secretariat and incorporates draft decisions proposed by the Standing Committee.

Background

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 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 (ICCWC) 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

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. The Secretariat reported to the Standing Committee, at its 69th meeting (SC69, Geneva, November 2017), on the implementation of Decision 17.239. The Committee, at SC69, agreed a number of recommendations on *Pangolins* (*Manis* spp.), including recommendation c) i) to iii) directed to the Secretariat, as presented in summary record SC69 SR, paragraph 57. To implement Decision 17.239, paragraph a), and recommendation c) i) to iii) agreed at SC69, the Secretariat conducted a variety of activities, of which some are highlighted below.

4. 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,¹ and requested these entities to take the matters expressed in the Resolution into account when developing their work programmes. Illegal trade in pangolins was also addressed in a video statement by the Secretary-General of CITES, at the 4th Regional Dialogue on Combating Trafficking in Wild Fauna and Flora, held in Bangkok, Thailand, in September 2017.²

5. The Secretariat issued CITES Alert No.50 on *Illegal trade in pangolins*, which contained information to be used for law enforcement purposes, and drew attention to the urgent need for enhanced enforcement action to address this illegal trade. The alert, available in English, French and Spanish, was shared with Parties significantly affected by illegal trade in pangolin specimens, INTERPOL, the United Nations Office on Drugs and Crime (UNODC), the World Customs Organization (WCO) including its Regional Intelligence Liaison Offices (RILO’s), 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 further shared through enforcement platforms such as WCO ContainerComm, WCO Environet, EU-TWIX, and Africa-TWIX. The Secretariat also engaged with the WCO regarding the development of a set of risk profiles and indicators to address illegal trade in pangolin specimens. The WCO has put in place arrangements, which includes the contracting of customs risk management experts, to *inter alia* explore the development of common risk indicators and profiles on pangolins, for use by Parties and which could be further tailored according to national circumstances. This work is at present ongoing.

6. The Lusaka Agreement Task Force (LATF) communicated to the Secretariat that crimes involving pangolins is included as a priority in its work programme. It also informed the Secretariat that, in May 2017, LATF 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 believed to be the mastermind behind the smuggling of six tons of pangolin scales seized in October 2016 in the United Republic of Tanzania. LATF further reported that in total 10 suspects linked to the case were arrested and that the investigation was ongoing. In July 2018, LATF informed the Secretariat that during an initiative concerning transnational investigations on illegal trade in pangolin specimens, and acting on information about suspected fraudulent permits communicated to LATF by the Secretariat, it worked with authorities in the Democratic Republic of the Congo to initiate investigations into the suspected fraudulent permits. The Secretariat was informed that these investigations resulted in the arrest of a staff member from the CITES Management Authority in the Democratic Republic of the Congo, and that the matter was under

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¹ Concerns expressed in Resolution Conf. 17.10 were addressed at the 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 (EU) 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); 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; the 35th meeting of the EU Wildlife Trade Enforcement Group in the Hague, Netherlands, in November 2017; the 14th meeting of the ASEAN working group on CITES and wildlife enforcement in Luang Prabang, Lao People’s Democratic Republic, in March 2018; the 36th Meeting of the EU Wildlife Trade Enforcement Group in Brussels, Belgium, in April 2018; the 29th meeting of the INTERPOL Wildlife Crime Working Group in London, UK, in October 2018; and the 3rd Africa/Asia Wildlife Inter-Regional Enforcement (WIRE) meeting in Nairobi, Kenya in November 2018.

implementation. The South Asian Wildlife Enforcement Network (SAWEN) also informed the Secretariat that crimes involving pangolins have been included in its workplan.

7. A number of enforcement activities, including activities to combat illegal trade in pangolin specimens, also took place. During ‘Operation Thunderbird’ from 30 January to 19 February 2017, 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, more than 3.9 tons of pangolin scales were seized. Further, “Operation Save REP” (Rhinos, Elephants and Pangolins), initiated under the auspices of the WCO Project INAMA in July 2017, focused on commercial air cargo and travellers, and international mail and courier packages. In total, approximately 70 kg of pangolin scales were seized during this operation. In May 2018, a month-long law enforcement operation code-named Operation Thunderstorm was initiated by the INTERPOL Wildlife Crime Working Group, with support from ICCWC and coordinated by INTERPOL and WCO. This operation resulted in the seizure of almost eight tons of pangolin scales.

8. The Secretariat considers that Decision 17.239, paragraph a), have been implemented and can be deleted.

Implementation of Decisions 17.239, paragraph b) and 17.240

9. The Secretariat contracted the International Union for Conservation of Nature (IUCN) to prepare a report in accordance with the provisions of Decision 17.239, paragraph b). The draft report was shared with all pangolin range States and affected States for comment, as required by Decision 17.240. The Secretariat subsequently prepared document SC69 Doc. 57 on Pangolins (Manis spp), for its reporting to SC69 in accordance with Decision 17.240. The executive summary of the report prepared by IUCN is available as Annex 1 to document SC56 Doc. 57, in English, French and Spanish. The full report is available in English and French, as Annex 2 to the document. The Secretariat also summarized the key findings of the report in paragraphs 16 to 57 of document SC69 Doc 57.

10. Decision 17.240 directed the Secretariat to formulate recommendations and draft decisions for consideration by the Standing Committee, and subsequent submission to the 18th meeting of the Conference of the Parties. Based on the report prepared in accordance with Decision 17.239, paragraph b), and the recommendations and draft decisions proposed by the Secretariat in the document it prepared for SC69, the Committee, as presented in summary record SC69_SR, paragraph 57, agreed a number of recommendations. The Committee also agreed draft decisions for consideration by the Conference of the Parties, as follows:

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 in paragraph 7 of Resolution Conf. 17.10 on Conservation of and trade in pangolins.

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

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4 The following Parties participated: Angola, Botswana, Ghana, Malawi, Mozambique, Namibia, Nigeria, South Africa, Uganda and Zambia (the latter not funded under the INAMA Project)
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 both the short and long-term placement of live pangolins that cannot be released.

18.xx 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), including pangolins range States, and other experts to develop guidelines on conducting pangolin population assessments.


Directed 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.

Observations of the Secretariat

11. The Secretariat takes this opportunity to offer some observations regarding the draft decisions agreed by the Standing Committee, presented in paragraph 10 above, and propose some amendments as well as new draft decisions for consideration by the Conference of the Parties, as elaborated upon below and presented in Annex 1 to the present document:

a) The Secretariat proposes to add to the end of draft decision 18.A agreed by the Standing Committee, the following text: ", and report on the implementation of this decision to the Secretariat". This proposed amendment is shown in draft decision 18.AA in Annex 1.

b) Regarding draft decision 18.B agreed by the Standing Committee, the Secretariat proposes to replace "the Species Survival Commission Pangolin Specialist Group of the International Union for Conservation of Nature (IUCN) and other" with "relevant". This proposed amendment is shown in draft decision 18.BB in Annex 1.

c) Regarding draft decision 18.C, paragraph a) agreed by the Standing Committee, the Secretariat notes that it has been informed by the U.S. Agency for International Development (USAID) Wildlife Asia, that it has since SC69 developed a guide entitled Pangolin Species Identification Guide: A Rapid Assessment Tool for Field and Desk. This guide is designed to support law enforcement officers in identifying the eight species of pangolins, and where possible, body parts and scales. It is available in Chinese, English, French, Khmer, Malay, Portuguese, Thai and Vietnamese, and the Secretariat was informed that plans are also underway to translate it into Indonesian and Lao. The guide is available in different formats, as follows: hard copy, smart phone application and web-based. With the permission of USAID Wildlife Asia, the Secretariat made the electronic versions of the guide available in the CITES Virtual College and Environet. USAID Wildlife Asia also informed the Secretariat that it is in the process of creating a number of resource posters based on the guide. USAID Wildlife Asia is also planning to develop a pangolin care handbook designed to provide first responders, quarantine and rehabilitation centres with basic guidance on how to take care of live confiscated pangolins.

d) Regarding draft decisions 18.C, paragraph b) and 18.xx agreed by the Standing Committee, the Secretariat has been informed by the IUCN Species Survival Commission (SSC) Pangolin Specialist Group, that the IUCN Global Species programme and the Specialist Group with generous support from the United States Fish and Wildlife Service, in 2017 initiated a project titled "Equipping pangolin range States to better implement CITES and combat wildlife trafficking through developing monitoring 

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6 https://www.usaidwildlifeasia.org/resources/pangolin-species-identification-guide
methodologies”. This project included the systematic review of monitoring methods applied to pangolins and species ecologically similar to pangolins. It also included a workshop on “Developing ecological monitoring methods for pangolins” held in Cambridge, United Kingdom of Great Britain and Northern Ireland, in July 2018. The workshop brought together conservation practitioners, pangolin experts, statisticians and ecological monitoring experts working in 16 pangolin range States, to evaluate potential methods for the monitoring of pangolin populations. This resulted in the development of guidance in which 14 methods for the monitoring of pangolin populations are discussed, some recommended for use in combination with others, and a number of which could have immediate application to particular species, while others have potential application to pangolins but have not yet been applied to them. A number of methods are reported to have theoretical application to pangolins but require proof of concept and field testing. Further details can be found in the guidance on Methods for monitoring populations of pangolins (Pholidota: Manidae) which is available in an information document prepared for the present meeting. The IUCN SSC Pangolin Specialist Group indicated to the Secretariat that the generation of basic ecological information on pangolins to further inform implementation of these methods, is an urgent need. For example, there are no home range estimates for four of the species. It was further indicated that the IUCN SSC Pangolin Specialist Group has commenced work on a CITES pangolin trade resource kit.

e) The work USAID Wildlife Asia and the IUCN SSC Pangolin Specialist Group conducted, as described in paragraphs c) and d) above, aligns with the provisions of paragraph 8 in Resolution Conf. 17.10, and should be commended. Considering the above, the Secretariat believes that the objectives of the draft decisions proposed by the Standing Committee might be better achieved by inviting Parties, intergovernmental organizations, international aid agencies and non-governmental organizations that compile relevant tools that could assist Parties in their implementation of Resolution Conf. 17.10, to bring such tools to the attention of the Secretariat. The Secretariat can then bring these to the attention the Standing Committee or the Animals Committee, as appropriate. The Secretariat in this regard proposes draft decisions 18.CC, paragraph b), 18.DD, paragraph a), 18.EE and 18.FF, as presented in Annex 1 to the present document. The Secretariat believes that, should the Conference of the Parties agree draft decisions 18.CC, paragraph b), 18.DD, paragraph a), 18.EE and 18.FF as proposed, they could replace draft decisions 18.C, paragraphs a) and b) and 18.xx as proposed by the Standing Committee.

f) With regard to the development of resource kits that include capacity building and identification materials, Parties may wish to note the efforts to consolidate the issues of capacity-building and identification materials at the present meeting, as elaborated upon in the documents prepared for discussion under agenda items 21 and 54.

g) Regarding draft decisions 18.D and 18.E agreed by the Standing Committee, the Secretariat proposes the changes presented in draft decision 18.CC and 18.DD in Annex 1 to the present document, to accommodate the changes proposed above.

12. The Secretariat considers that Decisions 17.239, paragraph b), and 17.240 have been implemented and can be deleted.

Proposed revision of Resolution Conf. 17.10

13. Considering that all eight species of pangolin have been listed in CITES Appendix I since CoP17, the Secretariat proposes to amend paragraph 7 in Resolution Conf. 17.10 on Conservation of and trade in pangolins, by deleting “the making of non-detriment findings for trade in the species,” from the paragraph. This proposed change is presented in Annex 2 to the present document.

Implications of the transfer of species to Appendix I

14. At SC69, Parties expressed different views regarding the interpretation of Resolution Conf. 13.6 (Rev. CoP16) on Implementation of Article VII, paragraph 2, concerning “pre-Convention” specimens and the transfer of a species from Appendix II to Appendix I. The Committee recommended that the Secretariat prepare a document for consideration at the present meeting, including information relating to the implications associated with the different interpretations. This matter is addressed in the document on Implications of the transfer of a species to Appendix I, prepared for the present meeting, for further discussion under that agenda item.
Final remarks

15. The efforts made by Parties to combat illegal trade in pangolin specimens, since CoP17 resulted in a significant number of very large pangolin seizures. These include for example two seizures totalling 2,132 kg pangolin scales in Thailand in 2017, one seizure of 11,900 kg pangolin scales and two seizures of pangolin bodies totalling 2,300 bodies in China in 2017; one seizure of 7,200 kg pangolin scales in 2017, and three further seizures of pangolin scales totalling 11,700 kg in 2018, in Hong Kong Special Administrative Region of China; and five seizures totalling 14,000 kg of pangolin scales in Nigeria in 2018. This highlights that illegal trade in pangolin specimens continue to take place at an industrial scale and is likely having a significant impact on pangolin populations. For this reason, it remains essential for Parties to remain vigilant and to further scale up efforts to address this illegal trade. Range, transit and destination States affected by illegal pangolin trade should actively pursue the full implementation of Resolution Conf. 17.10. Parties are in particular encouraged to strengthen the exchange of information by, where appropriate, bringing significant seizures of illegal pangolin specimens to the attention of authorities in countries of origin, transit and destination, as applicable, without delay. This should include providing all available associated information on the seizure to enable follow-up investigations to take place.

16. Further, it remains essential for consumer States to, as encouraged in paragraph 6 in Resolution Conf. 17.10, conduct research on the use of pangolin specimens, and on consumers and their motivations for consumption of pangolin parts and derivatives, to implement measures to reduce demand for illegal pangolin specimens on the basis of the results of such research. This should be pursued taking into consideration the implementation of Resolution Conf. 17 A on Demand reduction strategies to combat illegal trade in CITES-listed species.

Recommendations

17. The Secretariat invites the Conference of the Parties to:

a) adopt the draft decisions as presented in Annex 1 to the present document;

b) adopt the proposed amendment to Resolution Conf. 17.10 on Conservation of and trade in pangolins, as presented in Annex 2 to the present document, and

c) delete Decisions 17.239 and 17.240, as they have been implemented.
Draft decisions on pangolins agreed by the Standing Committee, as amended by the Secretariat

*Text proposed to be deleted is crossed out, and proposed new text is underlined.*

**Directed to all pangolin range States**

18.AA 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 on *Conservation of and trade in pangolins*, and report on the implementation of this Decision to the Secretariat.

**Directed to the Secretariat**

18.BB 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 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 both the short and long-term placement of live pangolins that cannot be released.

18.xx 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), including pangolins range States, and other experts to develop guidelines on conducting pangolin population assessments.

18.DCC The Secretariat shall:

a) report on the implementation of decisions 18.AA to and 18.CBB to the Animals Standing Committee; and

**Directed to the Standing Committee**

18.DDD The Standing Committee shall:

a) review consider any the report and recommendations of the Secretariat, in accordance with decision 18.CC, paragraph b), and any recommendations of the Animals Committee in accordance with decision 18.FF;

b) make recommendations to the Parties or the Secretariat as appropriate; and
c) report the results of its work together with any recommendations it may have, to the Conference of the Parties at its 19th meeting.

Draft decisions proposed by the Secretariat

Directed to the Secretariat

18.CC The Secretariat shall:

b) bring any tools or materials brought to its attention in accordance with Decision 18.EE, 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 tools or materials available to the Parties.

Directed to Parties, intergovernmental organizations, international aid agencies and non-governmental organizations

18.EE Parties, intergovernmental organizations, international aid agencies and non-governmental organizations that develop tools or materials that could assist Parties in the implementation of Resolution Conf. 17.10, are invited to bring such tools or materials to the attention of the Secretariat.

Directed to the Animals Committee

18.FF The Animals Committee shall review any information brought to its attention by the Secretariat in accordance with Decisions 18.AA, 18.BB and 18.EE, and make recommendations as appropriate to the Standing Committee and the Secretariat.
Proposed amendments to Resolution Conf. 17.10 on Conservation of and trade in pangolins

Text proposed to be deleted is crossed out, and proposed new text is underlined

7. URGES range States to work with appropriate bodies 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; and
TENTATIVE BUDGET AND SOURCE OF FUNDING
FOR THE IMPLEMENTATION OF DRAFT RESOLUTIONS OR DECISIONS

According to Resolution Conf. 4.6 (Rev. CoP16) on Submission of draft resolutions, draft decisions and other documents for meetings of the Conference of the Parties, the Conference of the Parties decided that any draft resolutions or decisions submitted for consideration at a meeting of the Conference of the Parties that have budgetary and workload implications for the Secretariat or permanent committees must contain or be accompanied by a budget for the work involved and an indication of the source of funding. The Secretariat proposes the following tentative budget and source of funding.

The implementation of draft decision 18.BB is subject to the provision of external funds, and does not require core funds. The tentative cost implications are estimated to USD 10,000. Supervision of the work will require some time from the Secretariat, but should be a core part of the Secretariat’s work and accommodated within its regular work programme.

The tasks allocated to the Secretariat in draft decision 18. CC paragraphs a) and b) can be accommodated within the regular work programme of the Secretariat.

The tasks allocated to the Standing and Animals Committees in draft decisions 18.DD and 18.FF might require intersessional work by the Committees and time during their meetings.