

## Wildlife

### **CITES Briefing Document**

The role of transnational criminal networks and China's legal pangolin scale medicine market in driving the global illegal pangolin trade

September 2021

EIA encourages CITES Parties, the CITES Secretariat and Animals Committee to consider the information contained in this briefing document when reviewing the study on pangolins developed in accordance with Decision 18.240, paragraph c)



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## ABOUT EIA

We investigate and campaign against environmental crime and abuse.

Our undercover investigations expose transnational wildlife crime, with a focus on elephants and tigers, and forest crimes such as illegal logging and deforestation for cash crops like palm oil. We work to safeguard global marine ecosystems by addressing the threats posed by plastic pollution, bycatch and commercial exploitation of whales, dolphins and porpoises. Finally, we reduce the impact of climate change by campaigning to eliminate powerful refrigerant greenhouse gases, exposing related illicit trade and improving energy efficiency in the cooling sector.

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**Front cover:** Sunda pangolin (*Manis javanica*) rescued from the illegal wildlife trade in Vietnam and undergoing rehabilitation for release by Save Vietnam's Wildlife  
**Photo** ©Kindred Guardians Project / We Animals Media

**Above:** Black-bellied pangolin (*Phataginus tetradactyla*) in the forests of southern Ghana

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## Key messages

- All eight pangolin species are facing an unprecedented threat from the transnational trafficking of their scales and meat by criminal networks.
- Between 2017, when the Appendix I listing for all pangolin species entered force, and July 2021, at least 269 tonnes of pangolin scales were confiscated globally.
- Pangolin scales are trafficked to China, often via Vietnam, and are primarily sourced from West, Central and East Africa.
- Nigeria, Cameroon and the Democratic Republic of Congo are the top export hubs for pangolin scales trafficked from Africa to Asia.
- Global pangolin trafficking is driven by consumer demand for traditional Chinese medicine (TCM) products containing pangolin scales.
- In China, licenced hospitals and pharmaceutical companies can legally trade and utilise pangolin scales from privately held stockpiles.
- In 2020, 56 pharmaceutical companies in China were confirmed to be advertising 64 manufactured medicines containing pangolin scales online.
- It is very likely that demand for pangolin scales in China far exceeds the legally available supply from stockpiles. It is also very likely that illegally acquired scales from Africa are entering China's legal TCM supply chains.
- Inaction on the part of the Chinese Government to close its domestic legal pangolin scale market is diminishing the effectiveness of CITES and driving pangolins to extinction.
- Several priority law enforcement issues prevent criminal justice systems from disrupting transnational pangolin trafficking networks, including a lack of:
  - institutional buy-in and integrated criminal justice system approaches;
  - international law enforcement cooperation;
  - action to address corruption;
  - financial investigations;
  - co-operation between public and private sectors;
  - stockpile transparency and management.
- EIA recommends that CITES Parties:
  - support decisions calling for urgent action by pangolin range, transit and consumer states to address the illegal trade in pangolins through effective criminal justice system approaches, including the implementation of legislation aimed at disrupting transnational organised crime, such as money laundering laws;
  - support decisions calling for targeted measures to eliminate consumer demand for pangolin specimens, including the closure of China's legal domestic market and amending legislation and policies as appropriate.

**Above:** over 30 countries, particularly in Africa and Asia, are affected by transnational pangolin trafficking

**Opposite page:** pangolin scale trafficking is low-risk high-reward activity undertaken by transnational organised crime groups which operate with complete impunity



## Pangolins are under critical threat

**1.** Pangolins are mammals with distinct features, such as keratin scales, a long tongue and a thick prehensile tail. Globally, there are eight species, four in Africa (giant ground, Temminck's, white-bellied and black-bellied) and four in Asia (Sunda, Indian, Chinese and Phillipine)<sup>1</sup>. Pangolins inhabit primary and secondary forests, woodlands, grasslands and deserts. They perform important roles in the functioning of ecosystems they inhabit, such as controlling populations of ants and termites.<sup>1</sup>

**2.** Decades of extensive hunting and trafficking of the four Asian species have driven them to the verge of extinction and they are all either Critically Endangered or Endangered on the IUCN Red List.<sup>2</sup> The rapid growth in pangolin scale trafficking from Africa to Asia since 2008,<sup>3</sup> in addition to habitat loss and the bushmeat trade within Africa, has caused substantial reductions in the populations of the four African species. In 2019, the worsening plight of pangolins was confirmed when three species – two African and one Asian – were reclassified into higher categories of extinction risk on the IUCN Red List. The IUCN cited the growing impacts of poaching, illegal trade and habitat loss in the escalating vulnerability of pangolins. Further reductions of between 30-80 per cent are possible during the coming decades if urgent action to curb demand for pangolin products and protect their habitat is not taken.

*i Note: Scientific names: Giant Ground Pangolin - Smutsia gigantea; Temminck's Pangolin - Smutsia temminckii; White-bellied Pangolin - Phataginus tricuspis; Black-bellied Pangolin - Phataginus tetradactyla; Sunda Pangolin - Manis javanica; Indian Pangolin - Manis crassicaudata; Chinese Pangolin - Manis pentadactyla; Phillipine Pangolin - Manis culionensis.*





## Global illegal pangolin trade

3. Despite the 2016 up-listing of all eight pangolin species to Appendix I of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) (Resolution Conf. 17.10), data from law enforcement seizures show a massive quantity of pangolin specimens (notably scales) continue to be illegally trafficked and traded internationally.<sup>4</sup> Between 2000-19, the equivalent of an estimated 745,000 pangolins were seized internationally, of which 80 per cent (592,000) were seized between 2016 and July 2019.<sup>5</sup>

4. Between 2017, when the Appendix I listing for all pangolin species entered force, and 4 July 2021, at least 269 tonnes<sup>ii</sup> of pangolin scales were confiscated globally.<sup>6</sup> In 2019, a record number of high-volume pangolin scale seizures (weighing 500kg and greater) were made by authorities, with approximately 95 tonnes seized from only 22 shipments. Several seizures in 2019 are among the world's largest known pangolin scale seizures ever recorded (Table 1); only two of these have resulted in prosecutions (Nos. 3<sup>iii</sup> and 5<sup>iii</sup>).<sup>9</sup>

5. In 2020, there was a drop in pangolin scale seizures due to the global impacts of the COVID-19 pandemic, with approximately 23 tonnes confiscated.<sup>10</sup> Despite this, EIA investigations have documented the continued sourcing, stockpiling and export of large volumes of pangolin scales in Nigeria, Cameroon, the Democratic Republic of Congo (DRC) and Vietnam by transnational criminal

networks.<sup>11,12</sup> This ongoing pangolin trafficking activity was exemplified in January 2021 when 5.3 tonnes of

**Table 1:** Global top 10 largest pangolin scale seizures (2000-21). Seizures 3 and 5 resulted in prosecutions (in China)\*.

No.	Date	Weight (kg)	Reported origin	Seizing country	Reported destination
1	April 2019	12,913	Nigeria	Singapore	Vietnam
2	April 2019	12,700	Nigeria	Singapore	Vietnam
3*	July 2019	11,912	DR Congo	Singapore	Vietnam
4	July 2019	11,900	-	China	-
5*	October 2019	10,650	Nigeria	China	-
6	January 2020	9,504	-	Nigeria	-
7	March 2018	8,492	-	Nigeria	-
8	March 2019	8,300	Africa	Vietnam	-
9	January 2019	8,268	Nigeria	Hong Kong SAR	China
10	July 2017	8,000	-	Malaysia	-

pangolin scales were seized alongside 4.8 tonnes of elephant ivory in Lagos, Nigeria en-route to Vietnam.<sup>13</sup> In March 2021, Cameroonian customs authorities seized more than four tonnes of pangolin scales in the north of country that were en-route to Nigeria.<sup>14</sup>

6. From 2013, there has been a growing convergence between the trafficking of pangolin scales and elephant

ivory. Globally, between 2018-21, at least 55 tonnes of pangolin scales and 23 tonnes of ivory have been jointly seized from 14 shipments (weighing more than 500kg) originating from Africa and destined for East or South-East Asia.<sup>15</sup> Such convergence demonstrates that existing CITES processes relating to strengthening responses to ivory trafficking, such as National Ivory Action Plans (NIAPS), are also relevant to pangolin scale trafficking.

7. In its latest World Wildlife Crime report, the UN Office for Drugs and Crime concluded that 71 per cent of pangolin scale seizures that took place between 2007-18 were destined for China. This pattern has continued and between 2019 and mid-2021, there were 13 pangolin scale shipments (weighing more than 500kg) with a total weight of 58 tonnes seized either in or en-route to China.<sup>16</sup>

8. The global trafficking of pangolins is a biodiversity conservation and sustainable development crisis.<sup>17</sup> Since 2016, EIA has conducted in-depth investigations into the criminal networks involved in trafficking pangolin scales from Africa to East and South-East Asia.<sup>18,19</sup> Our findings have confirmed that most pangolin scales are trafficked to China, often via Vietnam, and are primarily sourced from West, Central and East Africa. This trafficking activity is decimating pangolin populations, degrading ecosystem services, fuelling corruption and weakening criminal justice systems.<sup>20,21</sup>

9. Pangolin scales are trafficked to China using both maritime shipping and air cargo services and the top smuggling routes involve Nigeria, Cameroon, DRC, Malaysia, Singapore, Vietnam and Hong Kong SAR.<sup>22</sup> Other countries experiencing high levels of transnational

pangolin trafficking include Cote d'Ivoire, Togo, Liberia, Republic of the Congo, Central African Republic, South Sudan, Tanzania, Uganda, Kenya, India, Thailand, Myanmar, Indonesia, the Philippines and Turkey.

10. Based on seizure reports from 2015-21, it would be expected that the largest pangolin scale stockpiles (more than 10,000kg) should be held by China, Hong Kong, Vietnam, Nigeria, Singapore, Malaysia and Cameroon.<sup>23</sup> Other countries potentially holding pangolin scale stockpiles (those greater than 1,000kg) should include Tanzania, Uganda, Thailand, Côte d'Ivoire, Turkey, the Republic of Congo, Kenya, the Philippines, and DRC. In June 2021, the DRC Government repatriated a reported two tonnes of pangolin scales from the Republic of Congo.<sup>24</sup> Despite being subject to CITES Article XIII procedures, up-to-date and accurate data on quantities of pangolin scales held by the DRC Government are not publicly available.<sup>1v</sup>

11. Pangolin trafficking networks documented by EIA are primarily composed of nationals from West and Central Africa (including Guinea, Nigeria, Cameroon and DRC), China and Vietnam. One sophisticated and prolific Vietnamese network investigated by EIA, with operations in multiple African countries, is known to smuggle pangolin scales across the border between Vietnam and China.<sup>25</sup>

12. Wildlife traffickers use a range of techniques to launder the proceeds of wildlife trafficking.<sup>26</sup> This involves the use of formal financial sector services, front companies (especially those linked to import-export industries), purchase of real estate and luxury goods and informal money transfer systems (such as hawala or 'flying money'<sup>27</sup>).

13. In Asia, Sunda pangolins have been documented to carry coronaviruses.<sup>28</sup> The pangolin trafficking supply chain involves many stages in which humans can be exposed to the viruses they carry.<sup>29</sup> At the consumer end of illicit wildlife trade chains, live pangolins are often weak and infected by pathogens, meaning the live trade is very high risk for zoonotic disease spillover.<sup>30</sup>

14. There are two key factors driving the global illicit pangolin trade. Firstly, China's continued licencing of pharmaceutical companies and hospitals to legally trade in traditional Chinese medicine containing pangolin scales.<sup>31,32</sup> Secondly, a lack of effective criminal justice responses to address the involvement of transnational criminal networks in pangolin trafficking, making it a low-risk high-reward activity.

<sup>ii</sup> Note: "Tonnes" = metric tonnes (1,000kg)

<sup>iii</sup> Note: seizure data are subject to biases associated with law enforcement effort/detection and reporting.

<sup>iv</sup> Note: in CITES SC69 Doc. 29.2.2 (p6, 2017) the CITES Secretariat reported that the DRC Management Authority estimated that 13 to 14 tons of pangolin scales were held by DRC authorities. It was reported that updates on these stockpile volumes were expected but no further updates have been provided in subsequent DRC Article XIII documents submitted to the Standing Committee. Available online: <https://cites.org/eng/node/56553>.

**Above:** 8.2 tonnes of pangolin scales, alongside 2 tonnes of elephant ivory, seized by Hong Kong customs in January 2019. The shipment was trafficked from Nigeria and was destined for mainland China.

# China's legal commercial trade in pangolin scales

## Legal framework and permits

15. In China, the Chinese pangolin as well as the Sunda (*Manis javanica*) and Indian (*Manis crassicaudata*) pangolins are species subject to first-class special state protection. Non-native pangolins are subject to domestic protections by virtue of their CITES listing. Article 35 of the Wildlife Protection Law (2018)<sup>33</sup> stipulates that CITES-listed species can be managed as species under special state protection.<sup>34</sup> However, while commercial import and export of all pangolins is currently prohibited, application of the strictest domestic protections are not necessarily guaranteed. Article 35 of China's Wildlife Protection Law (2018) gives the National Forestry and Grassland Administration (NFGA) a mandate to 'approve', and thereby potentially alter, protections for non-native species.

16. In the report *Smoke and Mirrors: China's Complicity in the global illegal pangolin trade*, published in October 2020, using open-source methods, EIA documented the ongoing legal sale of pangolin medicines in China. Contrary to reports in the international media in 2020,<sup>35</sup> EIA confirmed that the Chinese Government continues to permit TCM entities in China to produce and sell pangolin scale medicines. In this, EIA exposed how the Chinese Government, through its Wildlife Protection Law and associated regulations, is implementing a stockpile and TCM product certification system<sup>36</sup> which is highly susceptible to abuse by pangolin traffickers.

17. Exemptions in China's Wildlife Protection Law (2018), such as Article 27, allow for the commercial use of species subject to special state protection. This exemption gives provincial forestry departments the authority to permit pharmaceutical companies and hospitals to use pangolin scales from Government-verified but privately held stockpiles in the manufacture of TCM products. EIA has documented how provincial forestry departments in China have specifically referenced Article 27 to authorise the use of pangolin scale stockpiles for the production of medicines.<sup>37</sup>

18. Between 2015-16, China's Guangdong provincial forestry department awarded seven separate approvals to Luoding Cheng Shan Trading Co Ltd and one of its subsidiaries for the import of pangolin scales from African countries.<sup>38</sup> At least two of these approvals were granted soon after the CITES Appendix I up-listing was adopted in September 2016, flouting the will of the Parties.<sup>39</sup> A further two were issued after the up-listing entered force in January 2017. In 2018, both the Chinese and DRC CITES Management Authorities issued CITES permits for the export of 2,000kg of white-bellied pangolin scales from DRC to China; the importer was Luoding Cheng Shan Trading Co Ltd.<sup>40</sup> These examples demonstrate that China was allowing the company to import pangolin scales in violation of CITES.



19. In response to the COVID-19 outbreak, the Standing Committee of China's National People's Congress (China's highest law-making body) adopted a series of decisions in February 2020 to stop wildlife trading activity.<sup>41</sup> These decisions made it illegal to consume terrestrial wildlife as food, including animals bred in captivity. However, the decisions did not end the consumption of wildlife for other purposes, such as TCM, the main demand side-driver of pangolin trafficking.

20. In October 2020, the Chinese Government issued a draft revised version of its Wildlife Protection Law, formalising the February 2020 decisions.<sup>42</sup> This revised version maintains existing exemptions allowing for the commercial use of species subject to special State protection, such as pangolins (in Article 30). As of July 2021, the revisions have not been adopted by China's National People's Congress. An opportunity therefore exists for concerned stakeholders to urge the Chinese Government to end the use of globally threatened wildlife in TCM.

*v. Note: In relation to the interpretation issue on the trade in pre-Appendix I pangolin specimens, CITES SC69 adopted the recommendation stating "until a decision is made by CoP18, Parties should treat specimens, including stockpiles, of Appendix I species of pangolin obtained when the species was listed in Appendix II, as Appendix I specimens and regulate trade in accordance with Article III of the Convention"*

## Patent medicines and a lack of stockpile transparency

21. EIA has identified 80 known patent TCM formulations in official Government medical standards which contain pangolin scales as an ingredient. We have also identified 221 pharmaceutical companies issued with approvals from China's National Medical Products Administration to produce 318 medicine products. A total of 56 pharmaceutical companies in China were confirmed by EIA to be advertising a minimum of 64 commercially available products containing pangolin scales online. Pangolin scale medicines were identified to be commercially available from some of China's largest TCM pharmaceutical companies, including Beijing Tong Ren Tang Group and Tianjin Zhongxin Pharmaceutical Group.

22. The Chinese Government has never publicly disclosed the origins nor size of Government or privately held pangolin scale stockpiles, yet at CITES CoP18, in August 2019, it claimed to strictly regulate the use of inventoried pangolin scale stockpiles.<sup>43</sup> The basis of this regulation is the China National Wildlife Mark scheme, which is purportedly intended to ensure pangolin scales used in approved medicines originate only from

old, verified stockpiles. However, there is a mismatch between availability and demand.

23. Records of official Government documents show that between 2008-14, the NFGA released annual quotas for the use of 186 tonnes of pangolin scales. It is very likely that demand for pangolin scales in China far exceeds the legally available supply through this quota system. In 2002, it was thought that between 80-100 tonnes of pangolin scales were consumed for medicine in China every year.<sup>44</sup> It is expected that current levels of demand for pangolin medicine far exceeds this amount.

24. Under the NFGA's quota allocation system, provincial forestry departments must verify, register and inventory stockpiles held by each pangolin scale stock owner.<sup>vi</sup> However, once verified, legal origin does not need to be demonstrated at any stage of trading, processing and sale. Given the difficulties in tracing the origins of pangolin scale stockpiles, China's convoluted trade in quota stocks between private entities is being exploited to launder illicitly sourced pangolin scales into the legal supply chains. This abuse is demonstrated through a recent case in which a Beijing pharmaceutical company was prosecuted for using fraudulent techniques to launder multiple tonnes of illicitly acquired pangolin scales.<sup>45</sup>

25. The revised 2020 draft version of the Wildlife Protection Law formalises the ability of Chinese Government departments to sell and auction seized wildlife products (in Article 62). EIA is aware of one example of pangolin scales being auctioned by the Chinese Government. In 2013, the Anhui provincial forestry department commissioned a company to auction a stock of pangolin scales. Given the sale price of RMB 1.47 million (USD 200,000), the auction likely involved a significant quantity of pangolin scales. While Government officials have publicly stated that seized pangolin scales are on occasion destroyed,<sup>46</sup> these examples demonstrate that they have also entered commercial supply chains and plausibly continue to do so. Any continued sale or auctioning of seized pangolin stocks by the Chinese Government would be contrary to the latest CITES recommendations on the disposal of confiscated Appendix I specimens outlined in Resolution Conf. 17.8.<sup>47</sup>

26. China's legal market for pangolin scale medicines legitimises the use of pangolin scales, stimulates demand and enables transnational organised crime groups to profit from the illegal high-volume exploitation of pangolins. The continued inaction on the part of the Chinese Government to fully close its domestic legal pangolin scale market violates and diminishes the effectiveness of CITES and is driving pangolins to extinction.<sup>48</sup>

*vi. Note: There is very limited public information on the quantities of pangolin scale stocks held by private entities and there is uncertainty as to whether the NFGA holds comprehensive and up-to-date records on these.*

**Above:** a legal Traditional Chinese Medicine product containing pangolin scales called 'Zaizao Wen' advertised on the website of Beijing Tong Ren Tang

# Law enforcement issues related to pangolin trafficking

27. Several regional country groupings such as the African Union,<sup>49</sup> East African Community (EAC),<sup>50,51</sup> ECOWAS<sup>52,53,54</sup> and ASEAN<sup>55</sup> have made high-level commitments to implementing collaborative international approaches to combat wildlife trafficking and eliminate demand for illegal wildlife products. Despite some examples of successful law enforcement outcomes relating to transnational pangolin trafficking, particularly in China,<sup>56,57</sup> individuals in the criminal networks most responsible for this crime continue to operate with impunity, exploiting its low-risk high-reward characteristics.

28. There are major vulnerabilities in the capability of criminal justice systems to effectively disrupt transnational pangolin trafficking networks.<sup>58</sup> This is demonstrated by the significant quantities of pangolin scales seized since 2017 in addition to the continued high-volume trafficking documented by EIA and other organisations<sup>59</sup> between 2019-21.

29. EIA recognises the following priority law enforcement issues preventing criminal justice systems from disrupting transnational pangolin trafficking networks.<sup>60</sup>

## • Lack of institutional buy-in and integrated criminal justice system approaches

Despite the numerous high-level commitments made to combat wildlife trafficking, in only a few jurisdictions have these filtered down to strategic and well-coordinated criminal justice responses. Furthermore, some countries, for instance Nigeria,<sup>61</sup> lack well-developed wildlife legal frameworks and clear institutional arrangements through which to combat transnational pangolin trafficking. This prevents effective multi-agency coordination between relevant agencies such as wildlife, police, customs, financial intelligence, anti-corruption and prosecutorial authorities. Potential exists for national authorities to better utilise customs, criminal code and anti-money laundering legislation for organised crime offences relating to pangolin trafficking.

Significant barriers are faced in relation to the prioritisation and resourcing of criminal justice responses to pangolin trafficking. This includes a lack of investigations which are both intelligence- and prosecution- led. Often the evidential standards required to prosecute cases are not met and if cases do reach court, they proceed slowly, in turn exacerbating corruption risks.<sup>62</sup> A lack of standardised sentencing guidelines means that punishments for pangolin trafficking often do not match the culpability of defendants and harmed caused by their crimes. Successful investigations and prosecutions outcomes



for high-volume pangolin trafficking have often resulted from the efforts of special crime units<sup>63,64</sup> or national-level civil society organisations.<sup>65,66,67,68</sup>

Above: there is significant potential for law enforcement agencies to better collaborate at the international level to effectively investigate pangolin trafficking networks.

## • Lack of international law enforcement cooperation

Transnational pangolin trafficking networks are composed of individuals from numerous African and Asian countries and commit offences across multiple legal jurisdictions. These are at regional, continental and inter-continental levels. Despite some successful efforts through bi-lateral cooperation,<sup>69</sup> Wildlife Enforcement Networks and international taskforces (e.g. Lusaka Agreement Task Force), there are limited examples of effective international cooperation between countries. While there have been some successes,<sup>70</sup> lack of

coordinated multi-/bi-lateral intelligence sharing and law enforcement action limits the strategic targeting of key actors in pangolin trafficking networks.

In its 2020 *World Wildlife Crime* report, the UN Office on Drugs and Crime (UNODC) highlighted that Parties to the UN Convention against Transnational Organized Crime (UNTOC) should use this as a legal basis for international cooperation, "including for mutual legal assistance (MLA), extradition, joint investigations and use of specialised investigative techniques such as controlled deliveries and undercover operations for the

most serious forms of wildlife crime". To achieve this, there is potential for countries experiencing high levels of pangolin trafficking to undertake bi- and multi- lateral engagements to build law enforcement cooperation and intelligence sharing arrangements. Strengthened support and resourcing for Wildlife Enforcement Networks or similar bodies, such as the planned ECOWAS West Africa Network to Combat Wildlife Crime (WAN), represents a significant opportunity

• **Lack of action to address corruption**

Public and private sector corruption across the Africa-to-Asia supply chain plays a key role in enabling the trafficking of pangolins and their parts and derivatives.<sup>71,72,73,74</sup> For instance, pangolin traffickers bribe customs officials to evade law enforcement scrutiny of pangolin scale shipments at ports.<sup>75</sup> In some countries, high-level wildlife traffickers are known to have political protection<sup>76,77</sup> and, when seizures or arrests are made, suspects evade investigation and prosecution through political influence and bribery.<sup>78,79</sup>

In 2016, at the 17th meeting of the Conference of the Parties to CITES, Resolution Conf. 17.6 on 'Prohibiting, preventing, detecting and countering corruption' was passed. This recognised the role of the UN Convention Against Corruption (UNCAC) in providing signatories with options to prevent corruption. Significant potential exists for countries experiencing high levels of pangolin trafficking to better uphold their commitments under UNCAC. This includes providing the space for civil society organisations to hold governments to account on wildlife crime, ensuring that corrupt public and private sector workers facilitating pangolin trafficking are investigated and prosecuted, and utilising anti-money laundering methods (including asset recovery for proceeds acquired through corruption).

• **Lack of financial investigations**

Transnational pangolin trafficking exhibits characteristics that justify its treatment as a serious crime.<sup>80</sup> This includes the involvement of organised crime groups operating across borders and engaging in money laundering, corruption and fraud. Pursuing money laundering prosecutions for pangolin traffickers represents a significant opportunity to disrupt those individuals most culpable in the global illegal pangolin trade. A prerequisite for this is that wildlife trafficking is considered a predicate offence for money laundering.

In 2020, the Financial Action Taskforce (FATF) concluded that the "number of financial investigations conducted into wildlife trafficking offences is, in many jurisdictions, not commensurate with its scale, cross-border nature, and the volume of proceeds associated with such crimes". FATF recommended there is a need for high-level political commitments to combat wildlife crime using anti-money laundering techniques as well as enhanced multi-agency approaches that involve agencies working on anti-money laundering. Fundamental to these commitments is the inclusion of wildlife trafficking as a risk factor in money laundering National Risk Assessments. Other key areas of need

include awareness-raising on wildlife trafficking issues, training in financial investigations techniques, resourcing and public-private information sharing.<sup>81</sup>

• **Lack of co-operation between public and private sectors**

Transnational pangolin trafficking networks rely on the services of companies in the transport, finance and other sectors. These include international maritime shipping, airfreight, banking and money transfer companies. Initiatives such as the United for Wildlife Transport<sup>82</sup> and Financial<sup>83</sup> Taskforces have provided an international framework for companies to make voluntary commitments to combat wildlife trafficking.

In jurisdictions with robust anti-money laundering laws, private sector financial and non-financial (e.g. real estate agents, lawyers and accountants) entities are legally required to submit Suspicious Activity Reports (SARs) to national Financial Intelligence Units (FIUs). Often, however, systems for identifying suspicious activity based on wildlife trafficking red flags are not well established and limited or no information is shared with FIUs. Likewise, relevant investigatory agencies do not fully utilise relationships with FIUs to obtain financial intelligence to inform investigations into wildlife trafficking.

Collaboration between transport sector companies and law enforcement is often extremely undeveloped. Priorities include the establishment of legal requirements for transport companies to detect and share information on suspicious trafficking activity with law enforcement, preventative measures and the integration of wildlife-specific red flag indicators into cargo risk assessment systems.<sup>84</sup>

• **Deficient stockpile transparency and management**

Robust chain of custody, transparent management and destruction of pangolin scale stockpiles are essential to ensuring that seized stocks do not re-enter illegal trade or enter legal trade. Transfer of seized scales into supply chains risks fuelling illegal trade and stimulating consumer demand. While CITES Parties have disclosed pangolin scale stockpiles in some instances,<sup>85</sup> there remains a significant lack of transparency on the status, use and disposal of these by national governments.

In China, laws permit Government authorities to auction or sell seized wildlife products, a practice contrary to CITES guidelines on the disposal of Appendix I specimens. Reports of 'leakage' of ivory from government-held stocks in several African countries, including Burundi,<sup>86</sup> Uganda<sup>87</sup> and DRC,<sup>88</sup> demonstrates that pangolin scale stockpiles are subject to similar risks. In countries of concern for pangolin scale stockpile leakage, potential exists to strengthen relevant laws, develop standard operating procedures, use electronic inventory systems and build stockpile management infrastructure. Existing efforts to enhance ivory stockpile management systems should be applied to pangolin scales.



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Above: Chinese pangolin (*Manis pentadactyla*) rescued from the illegal wildlife trade in Vietnam and undergoing rehabilitation for release by Save Vietnam's Wildlife

## Recommendations

**30.** EIA encourages CITES Parties, the CITES Secretariat and Animals Committee to consider the information contained in this briefing document when reviewing the study on pangolins developed in accordance with Decision 18.240, paragraph c).

**31.** In relation to strengthening international efforts to address the global illegal pangolin trade, EIA also encourages the CITES Parties, CITES Secretariat and the Animals Committee to consider the following EIA recommendations to Parties on addressing the global illegal pangolin trade:

- Support decisions calling for urgent action by pangolin range, transit and consumer States to address the illegal trade in pangolins through effective criminal justice system approaches, including the implementation of legislation aimed at disrupting transnational organized crime, such as money laundering laws

- Support decisions calling for targeted measures to eliminate consumer demand for pangolin specimens, including the closure of China's legal domestic market and amending legislation and policies as appropriate

- Propose amendments to Resolution Conf. 17.10 that:

- encourage Parties with high levels of consumer demand for pangolin specimens to eliminate demand for these, including closing legal domestic markets
- instruct the Secretariat to regularly report on the status of pangolins in the wild, their conservation and trade controls in place and on implementation of Resolution Conf. 17.10 by Parties for each Standing Committee and Conference of Parties.



Above: Temminck's pangolin (*Smutsia temminckii*) in Kenya

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**Below:** Sunda pangolin (*Manis javanica*) rescued from the illegal wildlife trade in Vietnam and undergoing rehabilitation for release



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